



USTR Announces Opportunity for Comments on Unfair and Non-Reciprocal Foreign Trade Practices

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On February 20, 2025, the Office of the United States Trade Representative (“USTR”) [announced](#) that it is seeking comments from the public concerning unfair and non-reciprocal foreign trade practices on a country-specific basis. According to the announcement, the comments received will assist USTR “in reviewing and identifying any unfair trade or non-reciprocal foreign trade practices.” In addition, as explained in the [accompanying notice](#) to be published in the Federal Register, the comments will assist USTR “in initiating all necessary actions to investigate harm to the United States from any non-reciprocal trade arrangements.”

USTR’s request for comments follows the Trump administration’s release of its [America First Trade Policy Presidential Memorandum](#) and the [Reciprocal Trade and Tariffs Presidential Memorandum](#). According to the request for comments, USTR is seeking information on a country-by-country basis regarding unfair trade practices – *i.e.*, “an expansive range of practices, such as policies, measures, or barriers that undermine or harm U.S. production, or exports, or a failure by a country to take action to address a non-market policy or practice in a way which harms the United States.” Further, “USTR is particularly interested in submissions related to the largest trading economies, such as G20 countries, as well as those economies that have the largest trade deficits in goods with the United States, including Argentina, Australia, Brazil, Canada, China, the European Union, India, Indonesia, Japan, Korea, Malaysia, Mexico, Russia, Saudi Arabia, South Africa, Switzerland, Taiwan, Thailand, Türkiye, United Kingdom, and Vietnam.” Comments should (1) include a description of the practice or trade arrangement; (2) include an explanation of the impact or effect on the interested party or U.S. interests generally; and (3) quantify the harm – ideally with a specific dollar amount – to American workers and businesses.

While this is the first formal opportunity for the public to weigh in on unfair and non-reciprocal foreign trade practices during the new Administration, USTR notes that this will not be the sole opportunity to do so and that ongoing engagement is encouraged.

Comments must be submitted via USTR’s online portal, <https://comments.ustr.gov/s/>, under docket number USTR-2025-0001, and will be posted publicly. However, commenters may include business confidential information with their comments, which will remain confidential if properly designated and certified. The deadline for comments is **March 11, 2025**.

Kelley Drye’s [International Trade](#) team continues to closely monitor the Trump administration’s trade actions and policies and is available to answer any questions.