

European Boating Industry (EBI)

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EU Ministers for Trade

President of the European Commission, Ursula von der Leyen
Commissioner for Trade and Economic Security, Maroš Šefčovič

Copy to: Permanent Representations of the EU Member States, EU Commission DG TRADE

Brussels, 4 April 2025

Subject: Review of trade countermeasures in response to US steel and aluminium tariffs - recreational boating sector

Dear Ministers for Trade,
Dear Commission President von der Leyen,
Dear Commissioner Šefčovič,

Ahead of the Foreign Affairs Council on Trade on 7 April 2025, we would like to bring to your attention the urgent concerns of thousands of companies in the recreational boating sector in relation to EU-US trade developments. We underline that the announcement on 2 April by the US Government on universal tariffs is serious and a huge risk to European businesses in our sector and across European industry.

On behalf of European Boating Industry (EBI), representing over 32,000 companies and 280,000 employees across Europe, we however also hold deep concerns regarding the potential inclusion of recreational boats and related products in the EU's trade countermeasures against the United States in response to steel and aluminium tariffs.

We acknowledge and support the objectives to safeguard EU interests. However, we strongly urge the removal of the following items from the countermeasure lists under Regulation (EU) 2018/886: **Recreational boats** (CN codes starting **8903**), **Sails** (CN code **63063000**), **Life jackets and belts** (CN code **63072000**).

Our industry is highly integrated globally but also regionally concentrated and specialised, with Europe and North America representing over 85% of the world's market in production and sales. EU boat builders and equipment manufacturers are globally competitive and almost entirely SME-driven (over 96%), relying on stable trade relationships. EU exports of recreational boats to the US exceed imports by a **ratio of at least 9:1**. This has almost doubled since 2018, when the list of trade countermeasures was first established. We believe that this underlines the necessity to reevaluate the list in today's context.

Tariffs on US boat imports and potential further reciprocal US action as can be expected threaten EU jobs, undermine supply chains, and disproportionately impact SMEs across all 27 Member States. Tariffs in this area would further disrupt a globally integrated market with unique product specialisations,

European Boating Industry

jeopardise an estimated **€50 million** in European value-added from US imports directly (25% of value of goods imported, around 200 \$ million) and put more than **1,8 \$ billion of exports at risk** indirectly, which is **1/3 of revenue** or more for many EU boat manufacturers and component manufacturers

It should be considered that our sector is highly seasonal and even a short gap in production will lead to an outsized impact that risks the entire year and even years ahead. Furthermore, inclusion of **life-saving products** such as life jackets lacks justification and risks affecting safety in both recreational and professional maritime operations. In the case of sails, we request removal as there is a lack of available alternative supply chains.

We therefore call on your leadership to **exclude CN codes 8903, 63063000, and 63072000** from any tariff implementation and ensure the EU's response remains proportionate and aligned with strategic economic interests. Our European sector is globally competitive and further tariffs will put this in danger.

EBI stands ready to provide further information and work collaboratively with the European Commission and Member States to safeguard one of Europe's most competitive, sustainable, and job-creating industries.

Yours sincerely,



Robert Marx - President, European Boating Industry (EBI)



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