



25 Massachusetts Avenue, NW
Suite 800
Washington, D.C. 20001
Phone 202.452.7100

www.steel.org

Kevin M. Dempsey
President and CEO

June 3, 2026

T. Mitchell Hudson, Jr.
Secretary
Maritime Administration
1200 New Jersey Avenue, SE
Washington, DC 20590

**RE: Request for Information: Icebreaker Collaboration Effort (ICE) Pact
[MARAD-2026-0496]**

Dear Secretary Hudson:

In response to a request from the Maritime Administration (MARAD),¹ the American Iron and Steel Institute (AISI) hereby submits comments on the Icebreaker Collaborative Effort (ICE) Pact – a joint effort to “increase the capacity of the U.S. to design, produce, and maintain polar icebreakers through trilateral collaboration with Canada and Finland while supporting each country’s shipbuilding industrial base.”

AISI serves as the voice of the American steel industry in the public policy arena and advances the case for steel in the marketplace as the preferred material of choice. AISI’s membership is comprised of integrated and electric arc furnace (EAF) steelmakers, steel pipe and tube manufacturers and steel processors and fabricators, reflecting the production and distribution of carbon, electrical and stainless steels. These steels are essential to America’s national and economic security, including roads and bridges, buildings, the electrical grid, defense applications, cars and trucks and all clean energy technologies. AISI also represents associate members who are suppliers to or customers of the steel industry.

I. Background

The Arctic is a region of vital economic and national security importance to the United States. As one of the few nations with citizens living above the Arctic Circle, the United States has longstanding humanitarian, scientific, economic and national security interests in the Arctic region. Icebreaking plays critical roles in supporting these

¹ *Request for Information: Icebreaker Collaboration Effort (ICE)*; MARITIME ADMINISTRATION; 91 Fed. Reg. 17326 (Apr. 6, 2026); available at: <https://www.federalregister.gov/documents/2026/04/06/2026-06648/request-for-information-icebreaker-collaboration-effort-ice-pact>

national priorities. At a time when other nations, including the People's Republic of China, are seeking to access both the region's navigable waters and considerable natural resources, it is imperative that the United States and its allies maintain a fleet of icebreaking vessels capable of asserting leadership in the region. Absent the ability to traverse Arctic waters reliably throughout the year, our nation's role in the region will be constrained and the ability to protect our national security and economic interests will be at the mercy of forces outside our control.

Since 1965, the United States Coast Guard (USCG) has been the federal agency charged with polar icebreaking.² The USGC's icebreaking legacy predates its founding as its predecessor, the Revenue Cutter Service, deployed vessels to break ice and keep navigational lanes open for commerce. The legacy of icebreaking capability and capacity is tied to the American steel industry. During the early years of icebreaking, hull construction changed from wood construction (*see e.g. the USRC Bear*) to wood hulls reinforced with steel (*see e.g. the USRC Andriscoggin*) to purely steel hull construction (*see e.g. the USS Ossipee*). In 1926, the USCGC *Kickapoo* – built by Bethlehem Steel – underwent hull modification that expanded the hull by 8.5 feet, becoming the first designed icebreaker. It was not until the mid-1930s that the first cutters with double hulls were built solely for icebreaking.³ USCG icebreaking capabilities were greatly aided after President Roosevelt signed Executive Order 7521 directing the USCG to “to assist in keeping open to navigation by means of icebreaking operations.”⁴ The result was the development and deployment of *Raritan*-class tugs which utilized heavy hull plating to create an icebreaking bow. In the midst of the Second World War, construction of the Windclass icebreakers commenced. And presaging today's ICE collaboration, these vessels were both utilized by the Royal Canadian Navy and the Canadian Coast Guard and built jointly in the United States and Canada.⁵

Much has changed when it comes to icebreaking. Today, sophisticated, advanced steels are used both to gird hulls and construct the stainless steel propellers necessary to

² *Chronology of U.S. Coast Guard Polar and Ice Operations*; UNITED STATES DEPARTMENT OF WAR; <https://media.defense.gov/2017/Jun/25/2001768438/-1/-1/0/USCGPOLARICEOPSCHRON.PDF>

³ *Kickapoo*, 1921 (WAGL-56); UNITED STATES COAST GUARD (Feb. 3, 2021) <https://www.history.uscg.mil/Browse-by-Topic/Assets/Water/All/Article/2492727/kickapoo-1921-wagl-56/>

⁴ Executive Order 7521 – Use of Vessels for Ice-Breaking Operations in Channels and Harbors; THE AMERICAN PRESIDENCY PROJECT (Dec. 21, 1936); <https://www.presidency.ucsb.edu/documents/executive-order-7521-use-vessels-for-ice-breaking-operations-channels-and-harbors>

⁵ Gallagher, Jack; *A Made-in-Canada solution for U.S. Coast Guard ice class ships*; THE MARITIME EXECUTIVE (May 7, 2025); <https://maritime-executive.com/editorials/a-made-in-canada-solution-for-us-coast-guard-ice-class-ships>

power these vessels. The American steel industry remains ready to provide the cutting-edge steel necessary to support a revived American shipbuilding including the production of icebreakers necessary to support our nation and protect our interests in the Arctic.

II. The Role of American Steel in Icebreaker Production

AISI appreciates the Trump administration's focus on rebuilding the American commercial shipbuilding and maritime sector, which plays an essential role in our national and economic security. The American steel industry is one of the primary suppliers of critical raw materials to America's shipbuilding industry. AISI member companies believe that ICE Pact is the sort of strategic, targeted industrial investment that can help initiate the revival of American shipbuilding. AISI members stand ready to assist in the production many ways including: provision of essential steel plating, stainless, electrical, and carbon steels necessary for shipbuilding, in addition to utilizing existing partnerships with our Canadian and Finnish partners to advance these goals.

AISI members lead in the production of steel plate: Reviving U.S. shipbuilding capabilities has the potential to create tens of thousands of jobs at U.S. shipyards and within the entire shipbuilding supply chain at manufacturing operations that produce key inputs across the country. Steel, especially steel plate, is a critical and irreplaceable material used for construction of icebreakers. The U.S. has significant steel plate production, including specialty plate for shipbuilding applications, which is currently substantially underutilized. In fact, in 2023 the U.S. International Trade Commission, in a recent trade remedy proceeding, found that capacity utilization in the cut-to-length (CTL) plate sector was an average of 67.8 percent over the period from 2016-21.⁶ Since that case, domestic CTL plate capacity has only increased, with additional new capacity coming online. American steel producers are fully prepared to meet the needs of shipbuilders as they increase their build. Securing production to build "new heavy and medium icebreakers" will support both the USCG's Polar Security Cutter and its Arctic Security Cutter. This investment will provide predictability both for the USCG and for shipbuilders to make the investments necessary to meet demand.

⁶ *Carbon and Alloy Steel Cut-to-Length Plate from Austria, Belgium, Brazil, China, France, Germany, Italy, Japan, South Africa, South Korea, Taiwan, and Turkey*; Inv. Nos. 701-TA-560-561 and 731-TA-1317-1328, USITC Pub. 5399 (Jan. 2023) at C-9 (Table C-1); U.S. INT'L TRADE COMM. *available at*: https://www.usitc.gov/publications/701_731/pub5399.pdf

Domestic steel plate producers bring more than seven decades of experience supporting shipbuilding timelines and delivery requirements. Compared to import offers, domestic lead times are typically one-half as long, providing critical schedule certainty for complex vessel construction. In addition, domestic producers offer competitive, integrated solutions across the supply chain – from raw material production through processing and delivery – helping to reduce risk and improve efficiency. U.S. producers have also made significant investments in advanced high-strength steels designed for the most demanding shipbuilding applications, including icebreaker hulls and propulsion systems, ensuring performance, durability, and reliability in extreme Arctic environments.

The American shipbuilding industry can produce the steel, including stainless steels, necessary for icebreaker construction: Some believe that American steel is a low-value, bulk commodity. Nothing is further from the truth. American steel production is a complicated, high-tech undertaking. Steel production is finely calibrated and based upon customer's specific needs. The result is that each order filled – whether carbon, electrical or stainless steel – is a complex, world-class product with unique chemistries and metallurgical qualities.

However, as specific industrial sectors have been offshored, a two-fold problem has arisen. First, expertise in manufacturing specific alloys has been lost as domestic markets for certain, bespoke metals is no longer needed. Second, manufacturing innovation is aligned with manufacturing production and as a result development of the newest alloys and steels for icebreakers will occur outside the United States if the associated manufacturing does not occur domestically.

In the case of icebreaker construction, new metals, especially stainless steels, are used to construct both the high-strength, acid-resistant sheaths gridding hulls and the propellers necessary for propulsion. American steel makers produce world-class stainless steels. Each of these stainless steels is prepared to meet specific customer needs. American steelmakers are capable of and ready to assist with production of the stainless steels needed for modern icebreaker construction.

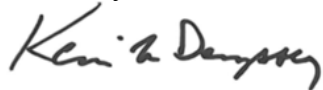
American steelmakers are ready to work collaboratively with ICE Pact partners: American steel production is rooted in the United States – what American steel producers make largely stays within the North American market. However, American steel producers are global actors with close ties to steel producers operating in both Canada and Finland. American steelmakers have the business relationships and ties necessary to help ensure success of the ICE Pact.

American steelmakers have the capacity and capability necessary to meet shipbuilding demands: Thanks to the administration's policies, American steel producers have been able to make critical investments that support job growth and industrial competitiveness. The administration's efforts to address the effects of global steel excess capacity have helped increase domestic steel capacity utilization. American steel producers retain the capacity and capability necessary to support both ICE Pact's production goals while also support expanded production of both commercial and defense shipbuilding needs.

III. Conclusion

Icebreakers remain a vital tool for projecting American leadership in a rapidly changing region. At a time when American icebreaking needs in the Arctic are increasing, our capabilities for building these vessels have atrophied. Efforts like ICE Pact can build upon existing alliances and partnerships to foster joint production of heavy and medium icebreakers. This is a critical undertaking. American steelmakers have the technological expertise, capability and capacity, and international partnerships necessary to support this important undertaking. AISI commends MARAD for undertaking this request for information and stands ready to support ICE Pact.

Sincerely,

A handwritten signature in black ink that reads "Kevin M. Dempsey". The signature is written in a cursive, flowing style.

Kevin M. Dempsey
President and Chief Executive Officer