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February 5, 2026

Hon. Christopher Abbott
Deputy Assistant Secretary for Policy and Negotiations
Enforcement and Compliance
APO/Dockets Unit, Room 18022
U.S. Department of Commerce
14th Street and Constitution Avenue, NW
Washington, DC 20230

Re: Sugar from Mexico, Suspension Agreements A-201-845, C-201-846

Dear Mr. Abbott:

We have noticed that *ex parte* meetings have been held with both the American Sugar Coalition (on January 8, 2026) and the Mexican Sugar Chamber (on January 22, 2026) to discuss “potential consultations regarding revisions to the AD and CVD Agreements.” We are writing on behalf of our members, which are the traditional suppliers of sugar to the U.S. market under the U.S. tariff rate quota (TRQ) on raw sugar,¹ to request that any proposed changes to the Suspension Agreements in the Antidumping and Countervailing Duty cases against Mexican sugar respect the legitimate rights of the quota holders. Although the quota holders may not meet the technical definition of “interested parties,” in the real world the quota holders are directly – and sometimes seriously - affected by decisions made in these proceedings.

In the past, ISTC has filed comments raising its concerns regarding the Department of Commerce’s (DOC’s) practice of interpreting the access formula in Section V of the CVD Suspension Agreement as excluding the amount of any predicted TRQ shortfall in calculating Mexico’s access. ISTC has complained that this interpretation, which is nowhere mandated in the Suspension Agreement, has the effect in practice of transferring the amount of the TRQ shortfall from the quota holders to Mexico, thereby punishing the innocent quota holders for Mexico’s unfair trade practices. ISTC has urged that the full amount of the TRQ, not the TRQ minus predicted shortfall, should be used in the Section V access calculations.

The justification for using the full amount of the TRQ in calculating Mexico’s access has been strengthened by Congress’ amendment of the Farm Bill in the 2025 “One Big Beautiful Bill” to require

¹ The International Sugar Trade Coalition (ISTC) is a trade association of sugar industries in countries that export sugar to the United States under the U.S. raw sugar TRQ. ISTC’s members are the sugar industries of Barbados, Belize, the Dominican Republic, Eswatini, Fiji, Guyana, Jamaica, Malawi, Mauritius, Panama, the Philippines, and Zimbabwe.

that the Department of Agriculture reallocate TRQ shortfall as soon as is practicable after the TRQ is announced each year, and in no event later than March 1. Pub. L. 119-21, Section 10312(d). Because of this new reallocation requirement, it is now likely that future TRQ shortfalls will be much smaller or even nonexistent.

Accordingly, we respectfully request that if revisions to the Suspension Agreements are to be considered, DOC should modify its interpretation of Section V of the CVD Suspension Agreement to utilize the full amount of the TRQ in calculating Mexico's access. We would be happy to discuss this matter further if you would find it useful.

Respectfully submitted,



Paul Ryberg
President

cc: Ms. Sally C. Gannon
Ms. Jill Buckles