

# INTERNATIONAL SUGAR TRADE COALITION, INC.

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March 16, 2022

Hon. Jason Hafemeister  
Acting Deputy Under Secretary  
Trade and Foreign Agricultural Affairs  
U.S. Department of Agriculture  
1400 Independence Avenue, S.W.  
Washington, D.C. 20250

Hon. Gloria Montano Greene  
Deputy Under Secretary  
Farm Production and Conservation  
U.S. Department of Agriculture  
1400 Independence Avenue, S.W.  
Washington, D.C. 20250

Re: Raw Sugar TRQ Shortfall Reallocation

Dear Deputy Under Secretaries Hafemeister and Greene:

We are writing to urge USDA to implement timely reallocation of the shortfall under the U.S. tariff rate quota on raw sugar (raw sugar TRQ). The International Sugar Trade Coalition (ISTC) is an association of sugar industries in countries that hold allocations under the U.S. raw sugar TRQ. ISTC's members account for about half of the TRQ. The members of ISTC are the sugar industries of Barbados, Belize, the Dominican Republic, Eswatini, Fiji, Guyana, Jamaica, Malawi, Mauritius, Panama, the Philippines, and Zimbabwe.

The March edition of the World Agricultural Supply and Demand Estimates (WASDE) report predicted 2021-22 TRQ shortfall of 230,000 short tons (ST), and a stocks-to-use ratio of just 13.6, which is at the low end of the market equilibrium spectrum.

On March 11, 2022, the Department of Commerce (DOC) increased Mexico's access under the Suspension Agreement in the countervailing duty case against sugar from Mexico by 128,670 ST to 1,037,400 ST, which is lower than the estimate of imports from Mexico used in the March WASDE of 1.050 million ST. In other words, even with the March 11 increase in Mexico's access, the stocks-to-use ratio is lower than 13.6, which is indicative of an undersupplied market. Continued high prices confirm this fact.

The simplest and quickest way for USDA to address this tight sugar market is to announce immediate reallocation of the 230,000 ST TRQ shortfall to those quota holders that are able to supply additional raw sugar to the U.S. market. The majority of ISTC's members are ready and willing to do so. USDA has the legal authority to implement TRQ shortfall reallocation at any time.

Please let us know if you require additional information in considering this request for timely TRQ shortfall reallocation.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Paul Ryberg". The signature is fluid and cursive, with the first name "Paul" and the last name "Ryberg" clearly distinguishable.

Paul Ryberg  
President

cc: Barb Fecso, FSA  
Joe Weresynski, FAS  
Erin Nicholson, USTR