INTERNATIONAL SUGAR TRADE COALITION, INC.

1701 Pennsylvania Avenue, N.W., Suite 200
Washington, DC 20006
Phone: 202-531-4028 www.sugarcoalition.org istc@sugarcoalition.org

May 15, 2026

Philip Butler, Chair, Section 301 Committee
Office of the U.S. Trade Representative
600 17th Street, N.W.
Washington, D.C 20508

Re: Docket No. USTR-2026-0067

Dear Mr. Butler:

We are writing to respond to comments submitted by the American Sugar Alliance (ASA) in the above-referenced docket regarding over-quota sugar imports, as well as the testimony presented by Rob Johansson of the ASA at the hearing on May 5, 2026.

The International Sugar Trade Coalition (ISTC) is a non-profit association of sugar suppliers under the U.S. tariff rate quota (TRQ) on raw sugar from: Barbados, Belize, the Dominican Republic, Eswatini, Fiji, Guyana, Jamaica, Malawi, Mauritius, Mozambique, Panama, the Philippines, and Zimbabwe. The members of ISTC represent approximately half of the TRQ.

The ASA has identified a legitimate and serious concern: second-tier sugar imports are destabilizing the U.S. sugar market and undermining the U.S. sugar program. ISTC supports the ASA's request for Section 301 tariffs on over-quota sugar imports, provided it is clearly understood that any such Section 301 tariffs would not apply to sugar imported within the TRQ, which are the traditional source of sugar imported into the United States.

Imports within the TRQ are regulated by USDA and are routinely sampled and tested by Customs and Border Protection (CBP). Over-quota sugar imports, by contrast, are virtually unregulated. The ASA's comments, testimony and request for relief are focused exclusively on these unregulated imports in excess of the TRQ, and only such over-quota imports should be the subject of additional tariffs.

We appreciate your consideration of our views on this important issue. We would be happy to provide any additional information that might be useful.

Respectfully submitted,

Paul Ryberg
President