INTERNATIONAL SUGAR TRADE COALITION, INC.

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May 21, 2026

Honorable Jamieson Greer
Office of the U.S. Trade Representative
600 17th Street, N.W.
Washington, D.C 20508

Re: Over-Quota Sugar Imports

Dear Ambassador Greer:

We are writing with respect to a letter sent to you on May 20, 2026, by more than 100 Members of Congress, requesting that the Administration should impose Section 301 tariffs on sugar imports in excess of the U.S. tariff rate quotas (TRQs) on sugar. That letter followed comments submitted on April 15, 2026, by the American Sugar Alliance (ASA) in USTR's excess capacity Section 301 investigation, Docket No. USTR-2026-0067, in which comments the ASA likewise requested Section 301 tariffs on over-quota sugar imports.

The Members of Congress and the ASA have identified a legitimate and serious concern: second-tier sugar imports are indeed destabilizing the U.S. sugar market and undermining the U.S. sugar program. The International Sugar Trade Coalition (ISTC) supports these requests 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 is the traditional source of sugar imported into the United States.

Sugar 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 relief requested by both the Members of Congress and the ASA is focused exclusively on these unregulated imports in excess of the TRQ, and only such over-quota imports should be the subject of additional tariffs.

The International Sugar Trade Coalition (ISTC) is a non-profit association of sugar suppliers under the U.S. 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.

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