

# INTERNATIONAL SUGAR TRADE COALITION, INC.

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July 28, 2023

The Honorable Gloria Montano Greene  
Deputy Under Secretary  
Farm Conservation and Production  
U.S. Department of Agriculture  
1400 Independence Ave., S.W.  
Washington, D.C. 20250  
[Gloria.Greene@usda.gov](mailto:Gloria.Greene@usda.gov)

The Honorable Jason Hafemeister  
Acting Deputy Under Secretary  
Trade and Foreign Agricultural Affairs  
U.S. Department of Agriculture  
1400 Independence Ave., S.W.  
Washington, D.C. 20250  
[Jason.Hafemeister@usda.gov](mailto:Jason.Hafemeister@usda.gov)

Re: 2022-23 Raw Sugar TRQ

Dear Ms. Montano Greene and Mr. Hafemeister:

We are writing on behalf of our members<sup>1</sup> to urge the Department of Agriculture (USDA) to extend the delivery period for the 2022-23 raw sugar tariff rate quota (TRQ) until December 31, 2023, to help address the tight market conditions in the U.S. sugar market.

We appreciate USDA's reallocation of TRQ shortfall and increase in the TRQ, which were announced on March 10, 2023, and July 10, 2023, respectively. The 125,00 metric ton (MT) increase in the TRQ caused the stocks-to-use ratio to rise from 13.1 in the June World Agricultural Supply and Demand Estimates (WASDE) report to 14.4 in the July WASDE. It is important, therefore, that as much of the TRQ increase actually enters the U.S. market as possible to ensure adequate supplies of sugar are available. Maximizing TRQ imports is all the more critical as Mexico has indicated it will not be able to supply additional sugar for refining this year. (See July 19, 2023 Mexico response to "additional needs" consultations in Case No. C-201-846, Suspension Agreements.)

Several of our members to whom shares of the TRQ shortfall reallocation and TRQ increase were assigned have advised that they will be able to supply additional sugar from their 2023-24 crop, with the new harvest now underway in the Southern Hemisphere. Such additional shipments, however, are unlikely to be able to reach the United States before September 30, 2023, when the TRQ delivery period would ordinarily expire.

USDA can help ameliorate tight sugar market conditions by extending the TRQ delivery period until December 31, 2023, as is within its discretion and as it has done in the past when circumstances

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<sup>1</sup> 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.

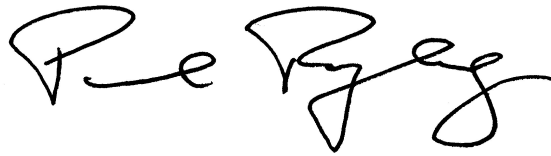
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warranted. Extending the delivery period would also make much-needed additional imports available during the first quarter of the 2023-24 crop/quota year, when supplies are expected to continue to be tight according to the July WASDE. As you know, USDA's options for increasing sugar supply prior to April 1 of each year are limited by the terms of the Farm Bill. Extending the delivery period under the preceding TRQ is one of the few viable options.

For all these reasons, we respectfully urge USDA to extend the delivery period under the 2022-23 raw sugar TRQ until December 31, 2023. Please let us know if you have questions. Thank you for considering our views on this important issue.

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 last name "Ryberg" clearly distinguishable.

Paul Ryberg  
President

Ms. Barbara. Fecso, USDA  
Mr. Dylan Daniels, USDA  
Ms. Erin Nicholson, USTR