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February 11, 2026

BY EMAIL: luke.lindberg@usda.gov

Hon. Luke J. Lindberg
Under Secretary for Trade and Foreign Agricultural Affairs (TFAA)
Administration Building
U.S. Department of Agriculture
1400 Independence Avenue, NW
Washington, DC 20250

Re: Reallocation of Raw Sugar Tariff Rate Quota Shortfall

Dear Under Secretary Lindberg:

We are writing on behalf of our members, who are the traditional suppliers of sugar to the U.S. market under the U.S. Tariff Rate Quota (TRQ) for raw sugar,¹ to urge the Department to re-allocate the predicted shortfall in the TRQ as soon as possible. This is extremely important to our members due to the very large shortfall predicted in USDA's latest World Supply and Demand Estimates (WASDE) report published yesterday. That predicted shortfall is 144,000 short tons. See attached WASDE - 668-16 "U.S. Sugar Supply and Use" February 2026.

Time is of the essence in doing so for two reasons:

- (1) In the past, the Department of Commerce (DOC) has had a practice of interpreting the access formula in Section V of the CVD Suspension Agreement on sugar imports from México 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 México, thereby punishing the innocent quota holders for México'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.

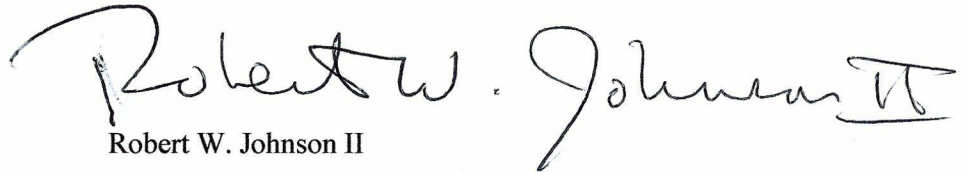
If the DOC does not change this practice, USDA can ameliorate the harm to the traditional suppliers by re-allocating the shortfall, thus reducing the amount transferred to México.

- (2) Congress amended 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.

the Department of Agriculture to reallocate the 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).

Therefore, we respectfully request the Department to move swiftly - before March 1 - to re-allocate the shortfall to the quota holders able to supply additional sugar to the United States.

A handwritten signature in black ink that reads "Robert W. Johnson II". The signature is written in a cursive style with a large, sweeping initial "R".

Robert W. Johnson II
Vice President

cc: Jason Hafemeister, jason.hafemeister@usda.gov
Dylan Daniels, dylan.daniels@usda.gov

Attachment: Feb 2026 WASDE Sugar Table

WASDE - 668 - 16

U.S. Sugar Supply and Use 1/

	2023/24	2024/25 Est.	2025/26 Proj.	2025/26 Proj.
			Jan	Feb
	<i>1,000 Short Tons, Raw Value</i>			
Beginning Stocks	1,843	2,220	2,489	2,489
Production 2/	9,313	9,396	9,381	9,410
Beet Sugar	5,172	5,370	5,102	5,102
Cane Sugar	4,141	4,027	4,279	4,308
Florida	2,079	1,931	2,082	2,082
Louisiana	2,022	2,095	2,197	2,226
Texas	40	0	0	0
Imports	3,840	3,393	2,255	2,243
TRQ 3/	1,788	1,534	1,366	1,316
Other Program 4/	300	373	200	200
Non-program	1,752	1,485	689	728
Mexico	521	504	220	220
High-tier tariff/other	1,231	980	469	508
Total Supply	14,995	15,009	14,125	14,142
Exports	249	111	50	50
Deliveries	12,443	12,450	12,153	12,153
Food	12,336	12,340	12,048	12,048
Other 5/	106	111	105	105
Miscellaneous	83	-41	0	0
Total Use	12,775	12,520	12,203	12,203
Ending Stocks	2,220	2,489	1,922	1,940
Stocks to Use Ratio	17.4	19.9	15.8	15.9

1/ Fiscal years beginning Oct 1. Data and projections correspond to category components from "Sweetener Market Data" (SMD). 2/ Production projections for 2024/25 and 2025/26 are based on Crop Production and/or processor projections/industry data and/or sugar ICEC analysis where appropriate. 3/ For 2024/25, WTO raw sugar TRQ shortfall (229) and for 2025/26 (144). 4/ Composed of sugar under the re-export and polyhydric alcohol programs. 5/ Transfers accompanying deliveries for sugar-containing products to be exported (SCP) and polyhydric alcohol manufacture (POLY), and deliveries for livestock feed and ethanol. Total refiner license transfers for SCP and POLY inclusive of WASDE-reported deliveries: 2023/24 -- 277; estimated 2024/25 -- 341; projected 2025/26 -- 273.

Mexico Sugar Supply and Use and High Fructose Corn Syrup Consumption 1/

		Beginning Stocks	Production	Imports	Domestic 2/	Exports	Ending Stocks	
		<i>1,000 Metric Tons, Actual Weight</i>						
Sugar	2024/25 Est.	Jan	1,418	4,771	167	4,210	1,023	1,123
		Feb	1,418	4,771	167	4,210	1,023	1,123
	2025/26 Proj.	Jan	1,123	5,047	75	4,320	803	1,122
		Feb	1,123	5,024	66	4,311	820	1,082

1/ HFCS consumption by Mexico (1,000 metric tons, dry basis): 2023/24 = 1,599; Estimated 2024/25 = 1,640; Estimated Oct.2024-Dec.2024 = 399 ; Projected 2025/26 = 1,640; Estimated Oct.2025-Dec.2025= 382. Footnote source for estimate: Comité Nacional para el Desarrollo Sustentable de la Cana de Azucar. 2/Includes deliveries for consumption, Mexico's products export program (IMMEX), and Other Deliveries/Ending Year Statistical Adjustments. IMMEX: estimated 2024/25 (323 est = 310 dom.+13 import). Projected 2025/26 (296 proj = 283 dom.+13 import). Statistical Adjustments: 2024/25 (-14); 2025/26 (0).