SWEETENER USERS ASSOCIATION

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July 16, 2026

The Honorable Luke Lindberg
Under Secretary for Trade & Foreign Agricultural Affairs
U.S. Department of Agriculture
1400 Independence Avenue, SW
Washington, DC 20250

The Honorable Richard Fordyce
Undersecretary for Farm Products & Conservation
U.S. Department of Agriculture
1400 Independence Avenue, SW
Washington, DC 20250

Dear Under Secretaries Lindberg and Fordyce:

I am writing to you on behalf of the Sweetener Users Association (SUA) in your capacities of responsibility for administration of U.S. sugar policy. As a result of the July World Agricultural Supply and Demand Estimates (WASDE), the Department of Agriculture can and should immediately reallocate the fiscal year (FY) 2026 raw sugar tariff-rate quota (TRQ) to move supplies back above its 13.5% target stocks-to-use level.

According to the July WASDE, a sugar company "remitted changes in deliveries for human consumption starting in 2019/20 and continuing through April of 2026" that reflected previous errors that totaled 145,870 short tons, raw value (STRV). Among other impacts, the reduction in deliveries moved the projected 2025/26 stocks-to-use ratio (S/U) from its previous 14.8% -- a level near the midpoint of USDA's traditional target range of 13.5-15.5% and indicative of ample though not excessive supplies – to a much lower 13.4%, below the bottom of the target range.

The size and extended duration of the reported error is in itself somewhat troubling, and SUA recommends that you and your colleagues review industry reporting protocols to minimize the chance of something similar happening in the future. Needless to say, all sugar market participants rely on the accuracy of the WASDE numbers as they make economic decisions about buying and selling sugar. The credibility and reliability of USDA projections are critically important to smooth and transparent markets.

Beyond making any needed revisions to reporting procedures, SUA also urges USDA to restore adequate supplies through a modest reallocation of the 2025/26 raw sugar TRQ. At least two annual reallocations are, in fact, mandated by P.L. 119-21, which includes improvements to sugar policy that were supported by grower and user groups alike. As SUA has repeatedly stated to USDA officials, our view is that it is appropriate to reallocate the TRQ shares of 10 countries that never or almost never are able to fill their quotas because they no longer export or, in some cases, even produce sugar.

SUA would be happy to discuss this request with you and your colleagues, and to provide any additional information that may be helpful. Again, SUA members strongly encourage you to implement the requirements of the law and carry out a TRQ reallocation.

Sincerely,

Richard Pasco
President