SWEETENER USERS ASSOCIATION

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September 14, 2026

Honorable Stephen A. Vaden
Deputy Secretary
U.S. Department of Agriculture
1400 Independence Avenue, SW
Washington, DC 20250

Dear Mr. Deputy Secretary:

The Sweetener Users Association (SUA) writes in support of a reallocation of the raw sugar tariff-rate quota (TRQ), given reductions in supply for 2026/27 projected in the most recent World Agricultural Supply and Demand Estimates (WASDE). The September WASDE pegs U.S. domestic sugar output at 426,000 short tons, raw value – below 2025/26 – reflecting lower harvested area, adverse weather and pest issues.

If the Department of Agriculture does not implement requirements for TRQ reallocation, the needed supplies will enter in the form of high-tier imports – something that you and other USDA officials have identified as a serious problem for program management. SUA has for some years decried the growth in high-tier imports, which primarily reflected the failure of the previous Administration to operate the sugar program in a proactive and responsible manner.

We agree with the points made in a September 11 letter to you from the International Sugar Trade Coalition, Inc., which likewise urges a TRQ reallocation in accordance with recently-enacted requirements in 7 U.S.C. 1359kk. The lack of a reallocation in the current year has contributed to a larger-than-normal shortfall in imports under the World Trade Organization TRQ – a gap that has been filled, once again, with high-tier imports.

Thank you for your consideration of our request. SUA reiterates our previously-expressed view that the initial TRQ reallocation should reflect the reality that several quota-holding countries never or almost never have the ability to fill their historical 45-year-old sugar quotas.

Sincerely,

Richard Pasco
President