



July 1, 2026

Ms. Jennifer Thornton, General Counsel
Mr. Philip Butler and Ms. Megan Grimball, Chairs of the Section 301 Committee
Office of the United States Trade Representative
600 17th Street NW
Washington, DC 20508

RE: Notice of Determination and Request for Comments Concerning Action Pursuant to Section 301: Brazil's Acts, Policies, and Practices (USTR-2026-0331)

Dear Ms. Thornton, Mr. Butler and Ms. Grimball,

The American Spice Trade Association (ASTA) appreciates the opportunity to submit comments regarding the proposed tariff action, scope of tariff coverage and excluded products as a result of the United States Trade Representative (USTR)'s Section 301 investigation into Brazil's acts, policies, and practices. ASTA represents more than 200 members, including American companies that grow, dehydrate, and process spices. As a sector that trades \$2 billion a year¹, our members directly support 50,000 U.S. jobs across processing, quality assurance, distribution, and product development.

ASTA welcomes the proposed tariff exemptions for certain agricultural products -- including spices -- from additional Section 301 tariffs under this investigation. We appreciate USTR's consistent trade policy approach recognizing that some agricultural commodities cannot be grown in the United States in commercial quantities. In Brazil's case, extending exemptions from Section 301 proposed tariff ensures access to diversified sources of spices, including but not limited to black pepper, paprika, ginger, saffron, and turmeric. We encourage USTR to maintain these exemptions in any trade remedy actions resulting from the Section 301 investigation in Brazil, as well as to consider expansion of the Annex if/as other unavailable spices are identified as priorities.

ASTA continues to share the Administration's goal of strengthening the U.S. economy and supports the Administration's trade and tariff policies to address unfair trade practices. The U.S. spice industry believes the use of Section 301 remains an important trade policy tool, and we commend the Administration for its actions to help restore fairness and resilience in U.S. supply chains.

Targeted trade enforcement and carefully calibrated exemptions are both necessary to achieving the Administration's objectives. Maintaining exemptions for spices reflects a balanced approach that supports U.S. industry while preserving access to critical inputs that cannot be sourced domestically.

ASTA appreciates the opportunity to provide comments and stands ready to engage further with USTR.

Respectfully submitted,

Laura Shumow
Executive Director

¹ U.S. International Trade Commission's DataWeb (<https://dataweb.usitc.gov/>) accessed 16 June 2026.