



AMERICAN SPICE TRADE ASSOCIATION, INC.

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May 30, 2025

Marshall Stallings  
Director for International Affairs and Public Engagement  
Office of the United States Trade Representative  
600 17th Street NW  
Washington, DC 20508

**Re: Follow Up from April 14 Meeting and Information on Relevant Unavailable Natural  
Agricultural Resources in Bilateral Negotiations**

Dear Mr. Stallings,

On behalf of the American Spice Trade Association (ASTA), I would like to express our sincere appreciation for the opportunity to meet with your team on April 14 to discuss the U.S. spice industry's priorities in the context of ongoing trade negotiations. We value your time and engagement and commend USTR for its efforts to rebalance trade relationships and address long-standing inequities that disadvantage American businesses and consumers. The U.S. spice industry also remains committed to supporting the Administration's broader goals of strengthening the American economy and growing American manufacturing and agriculture.

As discussed, many of the spices essential to U.S. food manufacturing and retail supply chains are not able to be produced domestically and must be sourced internationally. These products should be treated as unavailable natural resources when shaping trade policy and assigning tariffs. Without such consideration, tariffs on these products would not support increased U.S. production. Instead, they would create unavoidable price and accessibility challenges that cascade throughout the supply chain and ultimately negatively impact American consumers at the grocery store and restaurants.

We appreciate that the administration is currently focused on bilateral negotiations with key trade partners. As these discussions are ongoing, we respectfully submit a list of key Harmonized Tariff Schedule (HTS) codes for priority spices from major trading partners, including India, Vietnam, Madagascar, Indonesia, and Sri Lanka. These spices represent critical, irreplaceable inputs for U.S. food businesses and U.S. made consumer products, and we urge

that they be prioritized for consideration in future trade agreements or any country-specific exemption processes.

#### **India Key Unavailable Natural Resources**

- 0904.11 – Pepper of the genus Piper, neither crushed nor ground
- 0904.12 – Pepper of the genus Piper, crushed or ground
- 0910.30 – Turmeric (curcuma)
- 0909.31 – Cumin
- 0910.11 – Ginger
- 0909.61 – Fennel
- 0909.21 – Coriander
- 0908.31 – Cardamoms
- 0910.12 - Ginger, crushed or ground
- 0910.91 – Mixtures of Spices
- 0910.99 10 - Curry
- 0910.99.50 – Dill
- 0719.90.8580 - Other vegetables, other Chives

#### **Vietnam Key Unavailable Natural Resources**

- 0904.11 – Pepper of the genus Piper, neither crushed nor ground
- 0904.12 – Pepper of the genus Piper, crushed or ground
- 0906.20 – Cinnamon and cinnamon-tree flowers, crushed or ground
- 0906.11 – Cinnamon (Cinnamomum zeylanicum Blume) neither crushed nor ground
- 0906.19 – Cinnamon and cinnamon-tree flowers, nesoi, neither crushed nor ground

#### **Madagascar Key Unavailable Natural Resources**

- 0905.10 – Vanilla beans, neither crushed nor ground
- 0905.20 – Vanilla beans, crushed or ground
- 0906.11 – Cinnamon (Cinnamomum zeylanicum Blume) neither crushed nor ground
- 0907.10 – Cloves (whole fruit, cloves and stems), neither crushed nor ground
- 0907.20 - Cloves (whole fruit, cloves and stems), crushed or ground

#### Indonesia Key Unavailable Natural Resources

- 0904.11 – Pepper of the genus Piper, neither crushed nor ground
- 0904.12 – Pepper of the genus Piper, crushed or ground
- 0906.20 – Cinnamon and cinnamon-tree flowers, crushed or ground
- 0906.11 – Cinnamon (Cinnamomum zeylanicum Blume) neither crushed nor ground
- 0906.19 – Cinnamon and cinnamon-tree flowers, nesoi, neither crushed nor ground
- 0907.10 – Cloves (whole fruit, cloves and stems), neither crushed nor ground
- 0907.20 - Cloves (whole fruit, cloves and stems), crushed or ground
- 0908.11 - Nutmeg, neither crushed nor ground
- 0908.12 - Nutmeg, crushed or ground
- 0908.21 - Mace, neither crushed nor ground
- 0908.22 - Mace, crushed or ground

#### Sri Lanka Key Unavailable Natural Resources

- 0906.11 – Cinnamon (Cinnamomum zeylanicum Blume) neither crushed nor ground
- 0906.19 – Cinnamon and cinnamon-tree flowers, nesoi, neither crushed nor ground
- 0907.10 – Cloves (whole fruit, cloves and stems), neither crushed nor ground
- 0904.11 – Pepper of the genus Piper, neither crushed nor ground
- 0904.12 – Pepper of the genus Piper, crushed or ground

We would be happy to provide the full list of tariff codes by country upon request and remain at your disposal for any additional information or discussion that would support your ongoing work.

Thank you again for your continued attention to this matter and for your commitment to advancing a trade policy that benefits American consumers, strengthens supply chains, and grows the U.S. economy.

Sincerely,



Laura Shumow  
Executive Director  
American Spice Trade Association