



AMERICAN SPICE TRADE ASSOCIATION, INC.

1101 17th Street, N.W. • Suite 700
Washington, DC 20036 USA
Tel: 202-331-2460 • Fax: 202-463-8998
E-mail: info@astaspice.org
Web: www.astaspice.org

July 1, 2026

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

RE: Initiation of Section 301 Investigation into Vietnam’s Acts, Policies, and Practices Related to Intellectual Property Protection and Enforcement (USTR–2026–0364)

Dear Ms. Thornton and Ms. Grimball,

The American Spice Trade Association (ASTA) appreciates the opportunity to submit comments regarding the Section 301 investigation into Vietnam’s Acts, Policies, and Practices Related to Intellectual Property Protection and Enforcement. ASTA represents more than 200 members, including American companies that grow, dehydrate, and process spices. As a sector that trades \$2 billion¹ in product a year, our industry directly supports 50,000 U.S. jobs across processing, quality assurance, distribution, and product development.

The U.S. spice industry relies on globally sourced agricultural inputs that are not produced domestically due to geographic and climate limitations. As a result, imports are essential to support U.S. food manufacturing, retail, and foodservice sectors. Notably, Vietnam is the top source country for many of the spices that cannot be grown in the United States; in 2025, importers sourced \$510 million² worth of spices, including black pepper, cinnamon, and other spices not produced domestically in quantities that meet commercial demand.

ASTA continues to share the Administration’s goals of strengthening the U.S. economy and American manufacturing. The U.S. spice industry also supports the Administration’s trade and tariff policies to address unfair trade practices, counter structural imbalances in global markets, and protect American business interests abroad. As shared in other submissions, we believe the use of Section 301 to respond to foreign practices that distort markets and harm U.S. industry is an important trade policy tool, and we commend the Administration for its focus on restoring fairness and resilience in U.S. supply chains.

U.S. import data indicates that spices from Vietnam represent a nominal percentage³ of the total value of imports from Vietnam, providing little leverage to encourage Vietnam to adopt stronger intellectual property protections and enforcement. Trade remedies applied to spices would not impact the sectors engaging in online piracy, copyright infringement, counterfeiting, unlicensed software use, cable and

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

² Ibid.

³ Ibid.

satellite signal theft, nor affect government mechanisms intended to combat these practices in Vietnam. Instead, any new tariffs on unavailable natural resources, like spices, would only increase costs for U.S. manufacturers, the U.S. food sector and American consumers.

ASTA reiterates its deep appreciation for the Administration's November 14, 2025 Executive Order and subsequent actions excluding certain agricultural products -- including spices -- from additional tariffs. These actions reflect a clear and practical recognition that some agricultural commodities cannot be grown in the United States in commercially viable quantities and, therefore, should not be subject to tariffs that will hurt importers, processors and consumers.

For these reasons and consistent with the Administration's prior actions, we encourage the United States Trade Representative (USTR) to maintain and extend exemptions for unavailable natural resources in any trade remedy actions resulting from Section 301 investigations, including those that may be applied to Vietnam.

Targeted trade enforcement and carefully calibrated exemptions are both necessary to achieve 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 these comments and stands ready to engage further with USTR.

Respectfully submitted,

A handwritten signature in black ink that reads "Laura Shumow". The signature is written in a cursive, flowing style with a large initial "L".

Laura Shumow
Executive Director
American Spice Trade Association (ASTA)