



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: Notice of Determination and Request for Comments Concerning Action Pursuant to Section 301: Investigations of Acts, Policies, and Practices related to the Failure to Impose a Prohibition on the Importation of Goods Produced with Forced Labor (USTR–2026–0265)

Dear Ms. Thornton 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 subject to trade action as a result of the United States Trade Representative (USTR)'s Section 301 investigation into select countries' failure to impose a prohibition on the importation of goods produced with forced labor. ASTA represents more than 200 members, including American companies, that grow, dehydrate, and process spices. As a sector that trades more than \$2 billion¹ a year, our members directly support 50,000 U.S. jobs across processing, quality assurance, distribution, and product development.

ASTA applauds USTR's decision to exempt certain agricultural products -- including spices -- from additional Section 301 tariffs under this investigation. As shared in other submissions, we welcome USTR's trade policy approach acknowledging that some agricultural commodities cannot be grown in the United States in commercial quantities and that tariff exemptions are necessary to sustain U.S. access to unavailable natural resources, like spices. Extending agriculture tariff exemptions to the sixty countries covered by this investigation ensures access to diversified sources of spices, such as black pepper, paprika, cumin, cinnamon, ginger, saffron, vanilla and turmeric. We encourage USTR to maintain these exemptions in any trade remedy actions resulting from this and other Section 301 investigations, as well as to consider expansion of the Annex to include other tariff lines if/as other unavailable spices are identified as priorities.

ASTA continues to share the Administration's goal of strengthening the U.S. economy and believes the use of Section 301 remains an important trade policy tool. 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.

Thank you for the opportunity to submit comments, and we stand 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.