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March 11, 2025

Ambassador Jamieson Greer
U.S. Trade Representative
600 17th Street NW
Washington, DC 20508

Submitted via <https://comments.ustr.gov/s/>

Re: Docket Number USTR-2025-0001 -- ASTA Submission in Response to the Request for Comments to Assist in Reviewing and Identifying Unfair Trade Practices and Initiating All Necessary Actions to Investigate Harm from Non-Reciprocal Trade Arrangements

Dear Ambassador Greer,

The [American Spice Trade Association](#) (ASTA), and its members, are an essential part of a global food supply chain that nourishes every American family and employs millions of American citizens. Spices are critical ingredients to flavor healthful foods Americans prepare at home, as well as purchased meals produced by U.S. food manufacturers and restaurants. Last year, the U.S. imported more than \$2 billion of spices from more than 50 origin countries.¹ These spices became essential flavoring ingredients in hundreds of billions of pounds of food produced by American food manufacturers and consumed by American citizens.

ASTA recognizes the value of promoting U.S. food production and fully supports initiatives to bolster domestic food and agricultural production, including U.S.-grown spices. However, due to the realities of the U.S. climate (e.g. temperature, rainfall, humidity etc.), other environmental conditions and practical limitations, the vast majority of spices cannot be grown in America in quantities sufficient for commercial use. Imposing tariffs on agricultural goods that simply cannot be produced in commercial quantities in the U.S., such as many spices, offers no economic benefit to American businesses but rather harms American businesses and consumers. Any new tariffs will either raise food costs at a time when American consumers are facing unprecedented food price inflation, or increase absorbed costs by food manufacturers and restaurants, putting pressure to reduce costs elsewhere, including employment. As such, ASTA encourages the Administration not to place any new tariffs or trade actions on spices that are not able to be grown in commercial quantities in the U.S.

Additionally, we request that if any new tariffs are implemented on food and agricultural products that cannot be grown in the U.S., the Administration establish a tariff-exclusion request process for American

¹ [Global Agricultural Trade System](#) (GATS)

importers and stakeholders to submit requests to the Administration, similar to the tariff-exclusion process set up for Section 301 tariffs in President Trump's first term.

Below, please see more information on our request to ensure that the American spice industry can provide spices that cannot be grown in the U.S. at costs American consumers expect.

Economic Impact: The U.S. food and restaurant industry depends heavily on an affordable and steady supply of imported spices. New tariffs would lead to increased costs for consumers and businesses alike, exacerbating inflationary pressures of grocery and food service products.

Impact on American Jobs: The spice industry directly supports about 50,000 jobs in the U.S., including roles in processing, quality assurance, distribution, and product development. These jobs contribute significantly to the broader food and restaurant sector, which employs millions of Americans. The economic impact of the spice industry extends beyond direct employment, as it facilitates innovation and operations within the \$1.2 trillion U.S. foodservice industry.

Infeasibility to Grow Certain Spices in U.S. Many spices, such as black pepper, vanilla, cinnamon, and nutmeg, thrive only in tropical or subtropical climates with consistent warmth, high humidity, and specialized soil conditions. The U.S. climate lacks the necessary conditions to cultivate these crops on a commercial scale. For example, black pepper requires a hot and humid environment found in regions such as India, Vietnam, and Brazil. Vanilla is primarily grown in Madagascar and other tropical areas due to its dependence on specific temperature ranges and hand-pollination techniques. Cinnamon is harvested from the bark of trees native to Sri Lanka and Southeast Asia, which cannot survive U.S. winters.

Nearly all of the numerous plant species from which spices are derived are diversely adapted to thrive only within their native environments. Consequently, most spices are endemic to very distinct regions of the world and many are exclusively found only within other countries. It is not realistic for these spices to be grown in America due to the high costs of creating artificial growing conditions. Therefore, importing spices remains essential to meet U.S. demand and support the broader U.S. food sector.

Food Safety and Quality: Spices imported and processed in the U.S. are subject to rigorous quality and safety standards. U.S. processing facilities implement systems to mitigate risks, such as microbiological contamination and heavy metal exposure. For example, spices that are imported prior to domestic processing are monitored to prevent incidents like lead contamination, which has caused public health concerns in imported food products made with spices processed in developing countries. Similarly, the U.S. spice industry's focus on microbiological safety has ensured that common pathogens like *Salmonella* are effectively controlled, protecting consumer health. The implementation of tariffs has the potential to increase food safety and quality risks in imported spices due to economic pressure on global supply chains.

Furthermore, the availability of affordable spices in the U.S. is consistent with the goals and objectives of the Make America Healthy Again initiative, as spices are recognized for their health benefits and facilitate the consumption of healthy diets by adding flavor to nutritious foods.

Please see Annex A on the next page for the list of tariff codes for those spices not grown or able to be grown in the United States in commercial quantities.

Thank you for the opportunity to provide input on potential U.S. reciprocal trade action. We look forward working with the Administration on U.S. trade policy while ensuring low grocery prices for families and safeguarding domestic jobs in our sector.

Respectfully,

A handwritten signature in black ink that reads "Laura Shumow". The signature is written in a cursive style with a large initial "L" and a decorative flourish at the end.

Laura Shumow
Executive Director
American Spice Trade Association

ANNEX A. Priority List of Spices Tariff Codes

HS Code	Description
0712.90.60-0712.90.70	Dried vegetables, whole, cut, sliced, broken or in powder, but not further prepared: Fennel, marjoram, parsley, savory and tarragon
0712.90.8580	Dried vegetables, whole, cut, sliced, broken or in powder, but not further prepared: Other vegetables; mixtures of vegetables: Other
0802702000	Kola nuts
090411-090412	Pepper of the genus <i>Piper</i>
0905	Vanilla
0906	Cinnamon and cinnamon-tree flowers
0907	Cloves (whole fruit, cloves and stems)
0908.31 - 0908.32	Cardamom
0908.21 - 0908.22	Mace
0908.11 - 0908.12	Nutmeg
0909.21 - 0909.22	Seeds of coriander
0909.31 - 0909.32	Seeds of cumin
0909.61 - 0909.62	Seeds of anise, badian, caraway or fennel; juniper berries:
0910.11	Ginger, saffron, turmeric (curcuma), thyme, bay leaves, curry and other spices: Ginger
0910.99.05 or 0910.99.06	Ginger, saffron, turmeric (curcuma), thyme, bay leaves, curry and other spices: Thyme; bay leaves: Thyme
0910.99.05 or 0910.99.07	Ginger, saffron, turmeric (curcuma), thyme, bay leaves, curry and other spices: Thyme; bay leaves: Bay leaves
0910.99.50	Other: Dill
0910.99.60	Ginger, saffron, turmeric (curcuma), thyme, bay leaves, curry and other spices: Other spices: Other: Other
0910.91.00	Other spices, mixtures
0910.99.20- 0910.99.40	Origanum (<i>Lippia spp.</i>)
1207.40	Other oil seeds and oleaginous fruits, whether or not broken: Sesame seeds
1207.50	Other oil seeds and oleaginous fruits, whether or not broken: Mustard seeds
1207.91	Other oil seeds and oleaginous fruits, whether or not broken: Poppy seeds
1209.91.20	Vegetable seeds: Celery
1209.91.50	Vegetable seeds: Parsley
1211.90.20-1211.90.40	Plants and parts of plants (including seeds and fruits), of a kind used primarily in perfumery, in pharmacy or for insecticidal, fungicidal or similar purposes, fresh, chilled, frozen or dried, whether or not cut, crushed or powdered: Mint leaves
1211.90.8940	Basil
1211.90.8950	Sage
1211.90.8990	Plants and parts of plants (including seeds and fruits), of a kind used primarily in perfumery, in pharmacy or for insecticidal, fungicidal or similar purposes, fresh, chilled, frozen or dried, whether or not cut, crushed or powdered: Other
2103.90.72 - 2103.90.80	Sauces and preparations therefore; mixed condiments and mixed seasonings; mustard flour and meal and prepared mustard: Mixed condiments and mixed seasonings
2501.00.00	Salt (including table salt and denatured salt) and pure sodium chloride, whether or not in aqueous solution or containing added anti-caking or free-flowing agents; sea water