

March 20, 2026

The Honorable Howard Lutnick  
Secretary of Commerce  
U.S. Department of Commerce  
1401 Constitution Avenue NW  
Washington, DC 20230

**RE:** Phosphate Fertilizers from Morocco and Russia, Case No. C-714-001 (SUNR-2026)

Dear Secretary Lutnick:

On behalf of American farmers, growers and producers, we respectfully urge the Department of Commerce (“Commerce”) to revoke the countervailing duty orders (CVDs) on imports of phosphate fertilizer. Allowing the CVDs to continue will further worsen the dire economic conditions faced by American farmers.

Phosphate fertilizer is an essential input for modern crop production, used predominately for growing corn, soybeans, cotton and other agricultural commodities. U.S. growers rely on phosphate fertilizer to maintain yields, steward soil health, and remain competitive in domestic and global markets. Unlike discretionary inputs, phosphate fertilizer is fundamental to producing the food and fiber that sustain American families and rural economies.

Maintaining the phosphate fertilizer CVDs will allow a small set of powerful corporations to continue to limit supply options for farmers. This has already prevented farmers from accessing the tools that meet their crop production needs and resulted in lower yields and negative economic impacts. As Deputy Secretary of Agriculture Stephen Vaden has noted, two of the largest U.S. phosphate producers collude to “constrain the supply of so many of the fertilizers that our farmers depend on that they were able to get pricing power.”<sup>1</sup>

Respectfully, these companies—one of which’s CEOs receives \$9.8 million in annual compensation—do not need import protection to keep them healthy. Farmers on the other hand do need help. The United States simply does not have sufficient domestic phosphate resources to meet agricultural demand on its own. Farmers source domestically when possible, but must rely on imports to fill the gaps in supply. Access to reliable alternative sources of phosphate fertilizer supply is therefore critical to maintaining a competitive and resilient fertilizer market. When import duties substantially restrict that access, supply tightens, and prices rise. These outcomes unilaterally harm farmers, consumers, and the broader agricultural economy.

The current phosphate fertilizer countervailing duties (CVDs) are facilitating that constraint of supply. These CVDs have placed additional strain on farmers already navigating volatile

---

<sup>1</sup> Kellan Heavican, USDA Deputy Secretary flags fertilizer, equipment consolidation, Brownfield, (January 23, 2026)

commodity markets, weather uncertainty, and rising expenses across nearly every category of farm operations, and have impacted the affordability crisis that is so critical today. For many growers, fertilizer represented 40 percent of operating costs in 2025,<sup>2</sup> and price increases in this critical input directly affect planting decisions, long-term viability, and the livelihoods of farm families. This is why the third domestic producer, Nutrien, recently requested that the CVD be terminated, stating: “Based on evolving global phosphate supply and demand dynamics since 2021, we believe re-moving countervailing duties on phosphate imports would be a constructive step that supports U.S. farmer economics, balanced fertilizer application and agricultural productivity.”<sup>3</sup>

We respectfully call for the revocation of the existing phosphate fertilizer CVDs in the upcoming sunset review. Eliminating these duties would help restore balance to fertilizer markets by providing immediate relief to growers facing elevated input costs and a lack of availability. We appreciate Commerce’s role in ensuring fair and effective trade enforcement and respectfully ask that Commerce give adequate consideration to the real-world impacts these duties are having across the agricultural sector.

Thank you for your time and attention to this important matter. We stand ready to provide additional information or engage further as Commerce considers this issue.

Respectfully,

National Corn Growers Association  
American Soybean Association  
National Association of Wheat Growers  
National Cotton Council  
National Sorghum Producers  
Society of American Florists  
USA Rice  
US Rice Producers Association

Arkansas Soybean Association  
Colorado Corn Growers Association  
Corn Growers Association of North Carolina  
Delta Council  
Georgia Corn Growers Association  
Georgia/Florida Soybean Association  
Illinois Corn Growers Association  
Illinois Soybean Growers  
Indiana Corn Growers Association  
Indiana Soybean Alliance, Membership & Policy Committee  
Iowa Corn Growers Association  
Iowa Soybean Association

---

<sup>2</sup> Margy Ecklecamp, Phosphate Fertilizer Prices Soar Near Historic Highs, AgWeb (Aug. 8, 2025)

<sup>3</sup> Oliver Ward, Nutrien in favor of removing phosphate tariffs, March 4, 2026

Kansas Corn Growers Association  
Kansas Sorghum Producers  
Kansas Soybean Association  
Kentucky Corn Growers Association  
Kentucky Soybean Association  
Louisiana Cotton & Grain Association  
Maryland Grain Producers Association  
Michigan Corn Growers Association  
Michigan Soybean Association  
Mid-Atlantic Soybean Association  
Minnesota Corn Growers Association  
Minnesota Soybean Growers Association  
Mississippi Corn Growers Association  
Mississippi Soybean Association  
Missouri Corn Growers Association  
Missouri Soybean Association  
Nebraska Corn Growers Association  
Nebraska Sorghum Producers  
Nebraska Soybean Association  
New Mexico Sorghum Producers  
New York Corn and Soybean Growers Association  
North Carolina Soybean Producers Association  
North Dakota Corn Growers Association  
North Dakota Soybean Growers Association  
Ohio Corn & Wheat Growers Association  
Ohio Soybean Association  
Oklahoma Soybean Association  
Pennsylvania Corn Growers Association  
South Carolina Corn and Soybean Association  
South Carolina Corn and Soybean Association  
South Dakota Corn Growers Association  
South Dakota Soybean Association  
Tennessee Corn Growers Association  
Tennessee Soybean Association  
Texas Corn Producers Association  
Texas Grain Sorghum Association  
Texas International Produce Association  
Texas Soybean Association  
Virginia Grain Producers Association  
Virginia Soybean Association  
Wisconsin Corn Growers Association  
Wisconsin Soybean Association