

March 31, 2026

The Honorable Amy A. Karpel
Chair
U.S. International Trade Commission
500 E Street SW
Washington, DC 20436

RE: Phosphate Fertilizers from Morocco and Russia, Inv. 701-650-651 (Review)

Dear Chair Karpel:

On behalf of American farmers, growers and producers, we respectfully urge the International Trade Commission (“ITC”) 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.”¹

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.

¹ Kellan Heavican, USDA Deputy Secretary flags fertilizer, equipment consolidation, Brownfield, (January 23, 2026), available at <https://www.brownfieldagnews.com/news/usda-deputy-secretary-flags-fertilizer-equipment-consolidation/>

The current phosphate fertilizer countervailing duties (CVDs) are facilitating that constraint of supply. These CVDs have placed additional strain on farmers already navigating volatile 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 2025,² 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.”³

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 the ITC’s role in ensuring fair and effective trade enforcement and respectfully ask that the ITC 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 the ITC 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

² Margy Ecklecamp, Phosphate Fertilizer Prices Soar Near Historic Highs, AgWeb (Aug. 8, 2025), available at <https://www.agweb.com/news/phosphate-fertilizer-prices-soar-near-historic-highs>

³ Oliver Ward, Nutrien in favor of removing phosphate tariffs, March 4, 2026, available at <https://efile.fara.gov/docs/6401-Informational-Materials-20260309-64.pdf>.

Indiana Soybean Alliance, Membership & Policy Committee
Iowa Corn Growers Association
Iowa Soybean Association
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 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