

August 25, 2006

Ms. Merideth Sandler
GSP Subcommittee
USTR Annex, Room F-220
1724 F Street, NW
Washington, DC 20508

Dear Ms. Sandler:

The American Spice Trade Association (ASTA) was founded in 1907 and represents the interests of the spice industry around the world, specifically as it relates to trade in the United States. ASTA's membership is made up of almost 200 companies that manufacture, import, export, distribute, purchase and supply services to the spice and seasoning industry. ASTA members manufacture and market the majority of spices sold in the U.S. at retail and to food processors.

We are writing concerning the notice in the August 8th, 2006 Federal Register requesting comments on the eligibility of certain GSP beneficiaries and existing competitive need limitation waivers.

Approximately 80% of spices are imported into the U.S., a vast majority from countries such as India, Brazil, Venezuela, Indonesia, South Africa, Turkey, Argentina, and the Philippines. In fact, GSP eligible spices come from all the countries the Administration is seeking comments on for GSP eligibility status. We very much support the continued eligibility of Argentina, Brazil, Croatia, India, Indonesia, Kazakhstan, Philippines, Romania, Russia, South Africa, Thailand, Turkey, and Venezuela. India and Brazil are especially important countries for the U.S. spice industry and our members. Our members, many of whom are small importers and traders, have greatly benefited from the GSP program. For example, in 2005, GSP tariff savings for all spices was approximately 1.2 million dollars. Limiting, suspending, or withdrawing the eligibility of the GSP beneficiary countries referenced above would have an extremely negative impact on the spice industry.

Clearly, the GSP program benefits the U.S. spice industry, but we are also concerned about the economic growth and stability of the beneficiary countries. Most spices in these countries are grown on small family plots. The GSP program has helped create economic opportunity and increased and expanded trade.

Thank you for considering the international spice industry as you review the GSP program. Please contact me at 202-367-1207 if you have questions.

Sincerely,

Cheryl Deem
Executive Director