NATIONAL ASSOCIATION OF WHEAT GROWERS

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March 31, 2026

Secretary Lisa R. Barton
United States International Trade Commission
500 E Street SW
Washington, DC 20436

Re: Phosphate Fertilizers from Morocco and Russia, Five-Year Review of Countervailing Duty Orders

Dear Secretary Lisa R. Barton:

On behalf of the National Association of Wheat Growers (NAWG), which represents wheat farmers across the United States, we respectfully submit these comments regarding the International Trade Commission's (ITC) five-year review of the countervailing duty (CVD) orders on phosphate fertilizers from Morocco and Russia.

NAWG strongly urges ITC to determine that continuation of these CVD orders is not in the public interest and that revocation is warranted to provide critical relief to America's wheat farmers and the entire agricultural economy.

Phosphate fertilizer is an essential input for growing wheat. Fertilizer costs remain one of the most significant operating expenses facing growers, and for wheat growers, these costs are especially acute. According to USDA's cost-of-production projections for the 2026/27 marketing year, fertilizer accounts for approximately 38% of wheat operating costs and 15% of total costs, among the highest shares of any major field crop.

The current CVD orders have materially increased the cost burden borne by U.S. wheat farmers. Research from the Agricultural and Food Policy Center at Texas A&M University estimates that the CVDs on Moroccan phosphate fertilizers alone imposed $6.9 billion in additional fertilizer costs on growers of major U.S. crops between 2021 and 2025, with wheat growers absorbing just under $1 billion of that total.

NAWG's own analysis further demonstrates the disproportionate impact on wheat growers nationwide. Using USDA acreage and fertilizer application data, NAWG estimates that wheat growers incurred approximately $966 million in additional costs nationally from 2021 through 2025 as a result of these duties.

These costs are not theoretical. They have directly reduced grower margins during a period of prolonged economic stress in farm country marked by depressed commodity prices, elevated interest rates, increased fuel and input costs, and uncertainty in export markets.

The impact has been especially severe in key wheat states. NAWG's state-level estimates show cumulative increased costs of approximately:

- $202 million in North Dakota
- $141 million in Kansas
- $120 million in Montana

Note that substantial burdens also fall on Oklahoma, Minnesota, South Dakota, Texas, and other wheat-growing regions.

At the same time, the U.S. market remains dependent on imported phosphate fertilizer because domestic production does not fully meet national demand. As documented in our report, U.S. demand outstrips domestic phosphate supply by approximately 3 million metric tons annually, necessitating imports.

Morocco remains a particularly critical source of global phosphate supply, holding nearly 70% of global phosphate reserves and historically supplying a substantial share of U.S. imports prior to imposition of the duties. Since implementation of the CVD orders, Moroccan imports have fallen dramatically, tightening supply and contributing to elevated domestic prices.

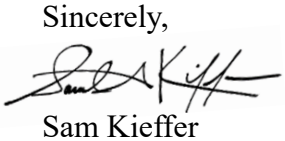
Given the essential nature of fertilizer to growing food and feed in the United States, NAWG believes continuation of these duties would perpetuate unnecessary financial harm to wheat growers and undermine U.S. agricultural competitiveness.

America's wheat farmers are already facing multiple external pressures outside their control, including geopolitical disruptions that have recently exacerbated fertilizer and shipping costs. ITC now has an opportunity to remove one cost driver that is within U.S. policy control.

For these reasons, NAWG respectfully urges ITC to revoke the countervailing duty orders on phosphate fertilizers from Morocco and Russia.

Thank you for your consideration of these comments and for your attention to the economic realities facing America's wheat growers.

Sincerely,



Sam Kieffer
Chief Executive Officer