

The Honorable Brooke Rollins  
Secretary  
U.S. Department of Agriculture  
1400 Independence Avenue, S.W.  
Washington, D.C. 20250

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

The Honorable Jamieson Greer  
Ambassador  
Office of the United States Trade Representative  
600 17th Street, N.W.  
Washington, D.C.

Dear Secretary Rollins, Secretary Lutnick, and Ambassador Greer,

As the leading trade associations representing the U.S. seed sector, we are writing to express our deep concerns regarding the harmful effects that tariffs will have on U.S. farmers, businesses, and consumers. Collectively, our organizations represent members responsible for plant breeding and seed production across a wide range of row crops, fruit and vegetable crops, flowers, turf and forage crops, and oilseeds. We urge you to consider the unique challenges facing the U.S. seed sector and provide tariff relief for our industry based on the following points.

**The U.S. seed sector is the cornerstone of U.S. agriculture.** International seed trade is at the heart of the U.S. agricultural economy, farmer productivity, and the national food supply. In 2024, the \$1.7 billion in U.S. seed exports and \$1.1 billion in U.S. seed imports represented a small fraction of the U.S. trade balance. Yet, during the same timeframe, the sector served as the foundation of U.S. exports of agricultural goods valued at \$179 billion, and the U.S. agricultural sector was estimated to support \$9.5 trillion in economic value and 1 million American jobs<sup>1</sup>.

**Developing new seeds for U.S. farmers requires international trade.** Unlike other agricultural goods, which are traded primarily for immediate use or processing in food and feed, the seed sector relies on trade for both commercial sales and as a fundamental component of years-long research and development (R&D) pipelines. Prior to commercialization, plant breeders depend on trade to conduct critical functions and test-drive new seed varieties before releasing them to farmers. The seed sector can require movement of seed between as many as six or seven countries throughout the R&D lifecycle of a single crop variety – before a seed is planted by U.S. farmers.

For example, counter-seasonal production is necessary for the seed sector to increase the speed of breeding during U.S. winter months, by producing seed in warmer locations. Production in specific environments also helps ensure that seeds are generated efficiently in environments free from pests and diseases that are detrimental to U.S. agriculture. Additionally, seed production in specific latitudes or growing environments cannot always be relocated, because some crops require certain weather or hours of sunlight to trigger plants to flower — and thus produce seeds.

**Tariffs threaten U.S. leadership in global seed innovation.** The continued escalation of tariffs on seed between the United States and our trading partners will result in U.S. farmers and consumers experiencing fewer choices and increased expenses. Through a combination of trade and use of

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<sup>1</sup> Feeding the Economy (2025): <https://feedingtheeconomy.com/press-release/>

advanced breeding approaches and technologies, the U.S. seed sector delivers the most innovative seeds to our farmers. The extensive R&D required to release a new crop variety can still take as long as 10-15 years — even with the best technologies and trade at our disposal to shorten the process.

Tariffs on seed movement lead to compounding costs, as a single company moves seed back and forth between countries within its own R&D process for necessary production and testing; retaliatory measures from other countries further exacerbate these costs. In the short-term, the current uncertainty arising from escalating trade tensions leaves perishable seed shipments vulnerable to delays at major ports of entry, prevents U.S. companies from being able to compete in important markets, and in the most extreme cases – can lead to a U.S. farmer missing the planting season for their crop. In the long-term, due to the necessity of trade for seed production, companies may be forced to relocate key aspects of their business or bypass R&D investment in the United States if costs continue to escalate.

**The impacts of tariffs are potentially significant.** Our members are already reporting that tariffs could represent anywhere between \$300,000 and several million dollars, per company, in additional costs in 2025 alone. Many small businesses in the U.S. seed sector cannot continue operations at those costs. This would mean less planting choices and higher prices for U.S. farmers. Furthermore, decreases in seed imports could cripple U.S. companies that provide critical seed processing and conditioning services that ensure maximum seed performance for farmers. If these businesses are forced to close or relocate due to costs, these services would no longer exist within the United States. Just as important, estimated yield losses without these services in certain U.S. vegetable crops could reach 80-100 percent, which would significantly harm U.S. farmers and consumers.

In closing, we appreciate your consideration regarding the important role that trade plays to the U.S. seed sector, and we would welcome the opportunity to speak with you. Planting seeds, or “seeds of a kind for sowing”, are found in chapters 07, 10, and 12 of the Harmonized Tariff Schedule. In international commerce alone, we have products traded under more than 80 tariff codes destined for over 100 export markets<sup>2</sup>. We request exemptions for these products at the six-digit level of the harmonized tariff schedule (attached), where possible, to minimize the complexity of the U.S. customs enforcement. This will ensure that we can continue to maintain the United States’ competitive edge within the seed sector, deliver innovative solutions to U.S. farmers, and provide affordable food to U.S. consumers.

Sincerely,

American Seed Trade Association

Agribusiness Council of Indiana

Agricultural Retailers Association

California Seed Association

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<sup>2</sup> USDA GATS (2025): <https://apps.fas.usda.gov/GATS/default.aspx>

Idaho Eastern Oregon Seed Association  
Illinois Seed Trade Association, Inc.  
Independent Professional Seed Association  
Iowa Seed Association  
Kansas Agribusiness Retailers Association  
Minnesota Crop Production Retailers  
Mississippi Seedsmen's Association  
Montana Seed Trade Association  
Ohio AgriBusiness Association  
South Dakota Agri-Business Association  
Southern Seed Association  
Texas Grain & Feed Association  
Texas Seed Trade Association  
Western Plant Health Association  
Wisconsin Agri-Business Association

## U.S. Harmonized Tariff Schedule (HS) Codes: Seeds of a Kind Used for Sowing

HS Code (6-digit)	HS Code (10-digit)	Article Description
070110	0701100020	POTATOES, SEED, FRESH OR CHILLED
070110	0701100040	POTATOES, SEED, FRESH OR CHILLED
071290	0712908550	SWEET CORN SEED
071310	0713101000	PEAS ( <i>Pisum sativum</i> ): SEEDS OF A KIND USED FOR SOWING
071320	0713201000	CHICKPEAS (GARBANZOS): SEEDS OF A KIND USED FOR SOWING
071331	0713311000	BEANS OF THE SPECIES <i>Vigna mungo</i> (L.) Hepper or <i>Vigna radiata</i> (L.) Wilczek: SEEDS OF A KIND USED FOR SOWING
071331	0713311020	BEANS OF THE SPECIES <i>Vigna mungo</i> (L.) Hepper or <i>Vigna radiata</i> (L.) Wilczek: OTHER
071331	0713311040	BEANS OF THE SPECIES <i>Vigna mungo</i> (L.) Hepper or <i>Vigna radiata</i> (L.) Wilczek: OTHER
071332	0713321000	SMALL RED (ADZUKI) BEANS ( <i>Phaseolus</i> or <i>Vigna angularis</i> ): SEEDS OF A KIND USED FOR SOWING
071333	0713331000	KIDNEY BEANS, INCLUDING WHITE PEA BEANS (PHASEOLUS VULGARIS), DRIED SHELLLED, INCLUDING SEED
071333	0713331020	KIDNEY BEANS, INCLUDING WHITE PEA BEANS (NAVY BEANS or <i>Phaseolus vulgaris</i> ): SEEDS OF A KIND USED FOR SOWING
071333	0713331040	KIDNEY BEANS, INCLUDING WHITE PEA BEANS: OTHER
071334	0713341000	BAMBARA BEANS ( <i>Vigna subterranea</i> or <i>voandzeia subterranea</i> ): OF A KIND USED FOR SOWING
071339	0713391100	BEANS NESOI (BLACK, LIMA, PINTO, COWPEAS, ETC.), DRIED SHELLLED, INCLUDING SEEDS OF A KIND USED FOR SOWING
071339	0713391110	SEEDS OF A KIND USED FOR SOWING: CRANBERRY BEANS
071339	0713391190	SEEDS OF A KIND USED FOR SOWING: OTHER
071340	0713401000	SEEDS OF A KIND USED FOR SOWING: LENTILS
071350	0713501000	BROAD BEANS ( <i>Vicia faba</i> va. <i>major</i> ) AND HORSE BEANS ( <i>Vicia faba</i> var. <i>equina</i> and <i>Vicia faba</i> var. <i>minor</i> ): SEEDS OF A KIND USED FOR SOWING
071360	0713601000	PIGEON PEAS ( <i>Cajanus cajan</i> ): OF A KIND UESD FOR SOWING
071390	0713901000	OTHER: LEGUMINOUS VEGETABLES, NESOI, DRIED SHELLLED, INCLUDING SEED
071390	0713901100	OTHER: LEGUME SEEDS OF A KIND UESD FOR SOWING, OTHER

HS Code (6-digit)	HS Code (10-digit)	Article Description
071390	0713905000	GUAR SEEDS
100111	1001110000	DURUM WHEAT SEED
100191	1001910000	WHEAT SEED, EXCLUDING DURUM
100210	1002100000	RYE SEED
100210	1002100010	RYE SEED: SEEDS OF A KIND USED FOR SOWING
100310	1003100000	BARLEY SEED FOR SOWING
100410	1004100000	OATS: SEED FOR SOWING
100510	1005100000	CORN (MAIZE) SEED, CERTIFIED, EXCLUDING SWEET CORN
100510	1005100010	CORN (MAIZE) SEED, YELLOW
100510	1005100090	CORN (MAIZE) SEED, OTHER
100710	1007100000	GRAIN SORGHUM: SEED
100821	1008210000	MILLET: SEED
120110	1201100000	SOYBEAN SEED
120230	1202300500	PEANUT SEED
120230	1202304000	PEANUT SEED
120230	1202308000	PEANUT SEED
120510	1205000010	RAPE OR COLZA SEED, WHETHER OR NOT BROKEN: FOR SOWING
120590	1205900010	RAPE OR COLZA SEED, WHETHER OR NOT BROKEN, OTHER, FOR SOWING
120600	1206000031	SUNFLOWER SEEDS, WHETHER OR NOT BROKEN, FOR SOWING
120721	1207210000	COTTON SEEDS: SEED
120760	1207600000	SAFFLOWER ( <i>Carthamus tinctorius</i> ) SEEDS
120770	1207700000	MELON SEEDS
120770	1207700020	CANTALOUPE SEED
120770	1207700040	WATERMELON SEED
120770	1207700075	MELON SEEDS, OTHER
120791	1207910000	POPPY SEEDS
120910	1209100000	SUGAR BEET SEEDS
120910	1209100000	BEET SEED USED FOR SOWING EXCEPT SUGAR BEET SEED
120921	1209210020	ALFALFA (LUCERNE) SEEDS, CERTIFIED
120921	1209210040	ALFALFA (LUCERNE) SEEDS, UNCERTIFIED
120922	1209222000	CLOVER ( <i>Trifolium</i> spp.) SEEDS: WHITE AND LADINO
120922	1209224020	CLOVER ( <i>Trifolium</i> spp.) SEEDS: ALSIKE
120922	1209224030	CLOVER ( <i>Trifolium</i> spp.) SEEDS: CRIMSON
120922	1209224041	CLOVER ( <i>Trifolium</i> spp.) SEEDS: RED DOUBLE CUT
120922	1209224049	CLOVER ( <i>Trifolium</i> spp.) SEEDS: RED OTHER
120922	1209224060	CLOVER ( <i>Trifolium</i> spp.) SEEDS: SWEET
120922	1209224095	CLOVER ( <i>Trifolium</i> spp.) SEEDS: OTHER
120923	1209230020	FESCUE SEEDS: TALL

HS Code (6-digit)	HS Code (10-digit)	Article Description
120923	1209230031	FESCUE SEEDS: CREEPING RED CERTIFIED
120923	1209230039	FESCUE SEEDS: CREEPING RED UNCERTIFIED
120923	1209230060	FESCUE SEEDS: MEADOW
120923	1209230090	FESCUE SEEDS: OTHER
120924	1209240000	KENTUCKY BLUE GRASS ( <i>Poa pratensis L.</i> ) SEEDS
120925	1209250020	RYEGRASS ( <i>Lolium multiflorum Lam., Lolium perenne L.</i> ) SEEDS: ANNUAL
120925	1209250040	RYEGRASS ( <i>Lolium multiflorum Lam., Lolium perenne L.</i> ) SEEDS: PERENNIAL
120929	1209290020	SEEDS OF FORAGE PLANTS FOR SOWING, NESOI
120929	1209291000	BEET SEED
120929	1209299120	BENT GRASS (genus <i>Agrostis</i> ) SEED
120929	1209299125	BERMUDAGRASS FOR SOWING: HUSKED
120929	1209299126	BERMUDAGRASS FOR SOWING: OTHER
120929	1209299130	BIRDSFOOT TREFOIL SEED
120929	1209299136	BROMEGRASS SEED: MEADOW
120929	1209299137	BROMEGRASS SEED: SMOOTH
120929	1209299138	BROMEGRASS SEED: OTHER
120929	1209299140	ORCHARDGRASS SEED
120929	1209299160	SUDAN GRASS SEED
120929	1209299171	WHEATGRASS SEED: CRESTED
120929	1209299174	WHEATGRASS SEED: OTHER
120929	1209299176	WILD RYE SEED
120929	1209299179	OTHER GRASS SEEDS
120929	1209299196	FORAGE SEED, OTHER
120930	1209300000	SEEDS OF HERBACEOUS PLANTS CULTIVATE PRINCIPALLY FOR THEIR FLOWERS, FOR SOWING
120930	1209300010	PETUNIA SEED
120930	1209300090	FLOWER SEED, OTHER
120991	1209911000	CAULIFLOWER SEED
120991	1209912000	CELERY SEED
120991	1209914000	ONION SEED
120991	1209915000	PARSLEY SEED
120991	1209916010	PEPPER SEED: SWEET
120991	1209916090	PEPPER SEED: OTHER
120991	1209918005	BROCCOLI SEED
120991	1209918008	CABBAGE SEED: GREEN CABBAGE
120991	1209918009	CABBAGE SEED: OTHER
120991	1209918010	CARROT SEED
120991	1209918020	RADISH SEED
120991	1209918030	SPINACH SEED
120991	1209918040	CUCUMBER SEED
120991	1209918045	KALE SEED

HS Code (6-digit)	HS Code (10-digit)	Article Description
120991	1209918047	KOHLRABI SEED
120991	1209918050	LETTUCE SEED
120991	1209918054	PARSNIP SEED
120991	1209918055	PUMPKIN SEED
120991	1209918060	SQUASH SEED
120991	1209918070	TOMATO SEED
120991	1209918074	TURNIP SEED
120991	1209918090	VEGETABLE SEED,OTHER
120999	1209992000	TREE AND SHRUB SEED
120999	1209994170	TOBACCO SEED
120999	1209994190	OTHER SEED