



The Honorable Howard Lutnick The Secretary of Commerce Washington DC 20230

The Honorable Jamieson Greer United States Trade Representative Washington DC 20508

November 3, 2025

## RE: Request for Full Implementation and Expansion of Annex III Floriculture Tariff Exemptions

Dear Secretary Lutnick and Ambassador Greer,

On behalf of the Floral Council of the International Fresh Produce Association (IFPA) and the Society of American Florists (SAF), we write to express our appreciation for your ongoing efforts to negotiate bilateral agreements that address non-tariff trade barriers and seek greater tariff reciprocity. Both of our organizations support equitable and robust trade relationships with our floriculture partners around the world.

IFPA is the largest industry association representing individuals and organizations across the global fresh produce and floral supply chain—encompassing businesses of all sizes and specialties. SAF is a national trade association representing the floriculture and greenhouse sector, including over 2,500 small businesses such as growers, wholesalers, retailers, importers, suppliers, and related entities, located across the United States and abroad.

Nearly 75-80% of all cut flowers sold in the United States are imported, as are more than 90% of the young plant cuttings used by domestic floriculture growers as starter materials. These imports—valued at approximately \$3.5 billion—underpin a vibrant \$71 billion U.S. floral industry. While domestic production remains vital and widely utilized, seasonal limitations and production costs prevent domestic growers from fully meeting consumer demand year-round.

As floral products are largely discretionary purchases, any price increase has a direct, adverse effect on consumer demand, posing challenges for the many U.S. small businesses connected to the floral industry. Tariffs imposed on imported floriculture products act as a de facto consumption tax, further compressing the narrow margins under which many U.S. floral businesses operate.

We were encouraged by the inclusion of numerous floral products in **Annex III** of the Executive Order 14346 issued on September 5, 2025, which revised the scope of reciprocal tariffs outlined





in Executive Order 14257. The modification made certain products—such as cut flowers, dormant planting stock, live plants, and other floriculture items from HTSUS Chapters 0601 through 0604—eligible for duty exemptions.

We respectfully request that the Department of Commerce and Office of the U.S. Trade Representative a fully implement these exemptions and ensure that products listed in Annex III are allowed to enter the United States duty-free from our global trading partners. According to USDA-ERS, the U.S. imported floriculture and nursery products from 81 countries in 2023—underscoring the global nature of our industry. However, imports from Canada, Colombia, Costa Rica, Ecuador, El Salvador, Ethiopia, Guatemala, Kenya, the Netherlands, and Mexico represent more than 90% of the total import volume and are of particular strategic importance.

We appreciate your attention to this matter and welcome the opportunity to engage further in support of fair and reciprocal trade that protects U.S. jobs and strengthens the floral industry's global supply chain.

Sincerely,

Colleen Fagundus
Director of Floral

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International Fresh Produce Association

Kate Penn

CEO

Society of American Florists