June 15, 2026

Ambassador Jamieson Greer
United States Trade Representative
600 17th Street, NW
Washington, D.C. 20508

The Honorable Howard Lutnick
Secretary of Commerce
1401 Constitution Avenue, NW
Washington, D.C. 20230

Dear Ambassador Greer and Secretary Lutnick,

The undersigned organizations request that you use your authority under Section (11) of the April 2, 2026 Proclamation to add as derivative articles a targeted list of canned foods that the United States imports in significant amounts and that it produces in large quantities.

Foreign canned food, including key fruits and vegetables coming from China and elsewhere, is taking market share from domestic sources as U.S retailers and institutional buyers (e.g., schools, prisons) increasingly shift from U.S. canned food to foreign canned food. For example, a very large bargain retailer recently switched to buying canned tomato sauce from Egypt instead of from a long-time U.S. canned tomato sauce producer, such that this retailer is now selling Egyptian canned tomato sauce in almost 21,000 stores across America. This move to foreign canned food is showing up in U.S. government import data. Consider that China's canned pea exports increased 96% from 2019-2025 and 28% from 2024-2025. China is also a major exporter of peaches, with imported filled peach cans now constituting roughly 50% of canned peaches sold in the United States, up from 16% in 2012. That percentage is set to go even higher with Del Monte's bankruptcy and no one buying its large California food canning facility, all in part due to foreign competition.

The reason for the shift to foreign canned food is simple: cost. To give one example, a U.S.-produced can of sweet corn with corn grown in the United States costs a retailer approximately $0.70, while a delivered Chinese can of sweet corn is roughly $0.40. The Section 232 steel tariffs have furthered this cost gap. While laudably trying to strengthen the American steel industry, continuing the current structure of applying Section 232 steel tariffs to the U.S. steel can value chain but not to imported canned food has the opposite, unintended result of harming U.S. steel producers, U.S. farmers, and the broader U.S. steel can value chain. Said differently, it's the opposite of America First to significantly tariff a key input to manufacturing steel food cans in the United States but not apply this tariff to imported filled canned food.

Adding canned foods as derivative articles subject to a Section 232 tariff would help reduce the cost disparity between U.S. canned foods versus foreign imported canned foods. Under Section (11) of the April 2, 2026 Proclamation titled "Strengthening Actions Taken to Adjust Imports of Aluminum, Steel, and Copper Into the United States," you are both authorized to include additional derivative articles. Filled metal containers are the only named example in this Section of the Proclamation of what can be included in the scope of the metal tariff under this authority. On May 14, 2026, American Fruit and Vegetable Coalition and Can Manufacturers Institute submitted to the Department of Commerce and the Office of the United States Trade Representative for consideration to add as derivative articles a targeted list of canned food HTS codes that the United States imports significant amounts of and that it produces in large quantities.

Adding these products to the derivative list, ideally at a 50% tariff, will meaningfully help reduce the cost disparity between foreign-filled food cans and U.S.-filled food cans without materially impacting inflation or affordability. No or negligible inflationary impact is expected because U.S. retailers tend to sell foreign-filled food cans and U.S.-filled food cans for the same or similar price, particularly the large brands selling the same canned food from both domestic and foreign sources. For example, recent Circana data shows Kroger is selling to the consumer for $2.99 a 14.5 oz can of no sugar added sliced peaches from China, while Kroger is selling for the same price a 15 oz can of sliced peaches from the United States. Adding these products to the derivatives list mainly means there is potentially less profit for retailers who are likely making more money by opting for cheaper, foreign canned food rather than supporting domestic farmers and food canners.

There are other actions the U.S. government could take to address the threat of greater imports of foreign-filled food cans—provide tinplate tariff relief, impose tariffs on foreign canned foods via Section 301, pass the American CANS Act (HR 914) to require more prominent country of origin labeling, and impose enhanced Buy American provisions via the Farm Bill (HR 7567) and other bills for schools, correctional facilities, and other federally funded institutions. However, the most immediate and impactful move would be to add this targeted list of canned foods to the derivatives list.

U.S. food security, manufacturing jobs (many of which are in rural America), and farmers' livelihoods are at stake. Once lost, these production acres and jobs will not likely come back to

America. We are available to answer any questions and provide more information. Thank you for considering our request to use your authority under Section (11) of the April 2, 2026 Proclamation to add a targeted list of canned food as derivative articles.

Sincerely,

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Denise Bode, *Coordinator*, **American Fruit and Vegetable Coalition**
Rachel Roberts, *President*, **American Mushroom Institute**
Daniel Bays, *President*, **Apricot Producers of California**
William Gast, *President and Business Manager*, **The Beckman & Gast Co.**
William R. Sherman, *CEO*, **Burnette Foods**
Al Williams, *President and CEO*, **Bush's Best**
Ginny Hair, *Executive Director*, **Canned Food Alliance**
Robert Gatz, *Vice President and General Manager*, **Can Corporation of America**
Scott Breen, *President*, **Can Manufacturers Institute**
Charles Wachsmuth, *President and CEO*, **Chippewa Valley Bean**
Tom Gordon, *President Food Packaging—North America*, **Crown Holdings**
Andrew K. Russick, *Vice President of Sales and Marketing*, **Del Monte Fruit Pantry**
Rich Brolly, *Chief Operating Officer*, **DS Containers**
Chad M. Geise, *President and CEO*, **Furmano Foods**
Mark Currie, *President*, **Giorgio Foods, Inc.**
Stephen Hirzel, President, **Hirzel Canning Co. and Farms**
Joe Yanda, *President and CEO*, **Lakeside Foods**
Woody Swink, *Co-President*, **McCall Farms**
John Berthold, *President*, **Midwest Dry Bean Coalition**
Nick Novak, *President*, **Midwest Food Products Association**
Hannah Dunbar, *President and CEO*, **Moody Dunbar**
Mitch Coulter, *Executive Director*, **Northarvest Bean Growers Association**
Mark Powers, *President*, **Northwest Horticultural Council**
Matt Strong, *President and CEO*, **Pacific Coast Producers**
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Jack Alexander, *President and Chairman*, **Rural & Agriculture Council of America**
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Ernest Haynes, *President of Consumer Packaging—The Americas*, **Sonoco**
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