



July 22, 2020

Via Electronic Submission:

Ms. Lisa R. Barton
Secretary
U.S. International Trade Commission
500 E St SW Washington, DC 20436

Re: Phosphate Fertilizers from Morocco and Russia Investigation (Inv. No. 701-TA-650-651, Preliminary)

Dear Ms. Barton:

The National Association of Landscape Professionals appreciates the opportunity to express our concerns regarding the petition for an investigation of phosphate fertilizers from Morocco and Russia, and to request the process not proceed, creating upward pricing pressures and undue costs on our members and their customers during such challenging economic times.

The National Association of Landscape Professionals is the national trade association representing nearly 100,000 landscape industry professionals in the United States, Canada and overseas. Member companies specialize in lawn care, landscape design and installation, landscape maintenance, tree care, irrigation and water management, and interior plantscaping. Members also include students, consultants, industry suppliers, state associations and affiliate members. Collectively, we represent a profession that employs one million landscape and lawn care professionals across the country who maintain and protect our living infrastructure, preserve public health, maintain outdoor green spaces, and support our economy by creating local jobs.

Among the inputs our members rely upon is phosphate fertilizer, a key nutrient for the lawns, trees and shrubs that help make our public and private outdoor spaces healthy and beautiful. The price of fertilizers, herbicides, fungicides, seeds and the other components that our members buy to service their customers' needs have a direct bearing on the costs of the services they provide. Because of the Commission's authority to impose retroactive duties, the petition by The Mosaic Company asking for new and significant duties on phosphate imports from Morocco and Russia will unnecessarily create upward pricing pressure on phosphate that will be felt by our members and their customers immediately if it proceeds to an investigation phase.

Nutrient prices, including phosphate, have been driven down in recent years due to a number of factors largely impacting the agriculture sector, including weather, supply chain factors, as well as the emergence of low-cost overseas producers like Saudi Arabia. Most other commodity inputs have also followed a similar trend, which has flowed through to the crop commodity

prices as well. Given the downward pricing trends for nearly all raw materials and the commodities that depend on them, it is unrealistic to single out two countries, Morocco and Russia, for unfair trade practices, as was done in the petition.

For these reasons, we ask that you reject the petition for an investigation and spare our member professionals and their customers the unnecessary cost increases.

Sincerely,

A handwritten signature in blue ink, appearing to read 'A. Bray', with a stylized flourish at the end.

Andrew Bray
Vice President Government Relations
National Association of Landscape Professionals