



Mr Maroš ŠEFČOVIČ
European Commissioner for Trade
European Commission
B-1040, Brussels

Brussels, 4 April 2025

RE: EU-US exclude almonds from any potential EU countermeasures

Dear Commissioner Šefčovič,

We are contacting you on the behalf on behalf of the [European Snacks Association](#) (ESA), the [Association of Chocolate, Biscuit and Confectionery Industries of Europe](#) (CAOBISCO), [the European Federation of the trade in dried fruit, edible nuts, processed fruit & vegetables and processed fishery products](#) (FRUCOM) and the [Association of the German Confectionery Industry](#) (BDSI) regarding the current discussions on the EU list of products which could be subject to possible commercial policy measures in the context of the trade dispute with the United States.

We regret the reciprocal tariffs measures announced by the US administration and stand together with the European Union in supporting a negotiated resolution. As the European Union considers further retaliatory measures, our industries wish to recall the value to the European market created through imports of dried-fruits and nuts from the United States – imports which cannot be substituted with either European production or other Third Country origin. We strongly call on the Commission to exclude dried-fruits and nuts from any potential retaliatory actions.

Our industries are deeply concerned about the potential inclusion of almonds on the EU target lists. Almonds are primarily an imported raw material, with value addition occurring in Europe.

European production is not sufficient to meet the growing demand, which continues to increase. In terms of volume, European almonds accounts for about 9% of global production, primarily from Spain and Portugal. The U.S.- primarily California, is by far the largest producer and supplies around 76% of global almond production, with Australia contributing about 10%, most of which is already absorbed by Asian markets due to existing tariff concessions. Due to the dominant share of world production, American almonds cannot be substituted by volumes from other origins.

Approximately 60% of almonds are consumed as snacks, while the food processing industry uses the remaining 40% as an ingredient, primarily in the production of marzipan. Most of our almonds, sold as single items under private-label brands (retailer brands), will be immediately affected by this increase in raw material costs. As a result, we can expect a drop in volume, and some retailers may resist the price increase or even cancel orders in anticipation of consumer rejection in the EU.

European operators trading in almonds are almost exclusively small and medium sized enterprises, and almonds are an essential part of their business and trading activities. They have concluded supply contracts for 2025, and these contracts offer no possibility of cushioning or absorbing the cost from any additional tariffs. Where this additional tariff is passed on to their customers, then it is ultimately



the consumer who will pay. If it cannot be passed on, then the businesses are looking at making redundancies, and for some of the smaller operators, even being forced into liquidation.

There is no viable alternative supplier that can meet the growing European demand.

Moreover, the almond varieties grown in Europe are not the same as those produced in the U.S. Imported almonds complement European varieties and enhance consumer demand. Almonds are used in various sectors – not only has a snack but in cereals, bakery products, and confectionery—making them an essential raw material supporting a high level of value-added processing, innovation, and employment – particularly among SMEs.

Trade tensions and additional tariffs would harm the competitiveness of EU manufacturers and disrupt a long-standing, mutually beneficial transatlantic trade relationship. A potential retaliatory duty on these products will result in significant cost increases for EU businesses, which will either have to absorb the additional costs or pass them on to customers and consumers.

Europe’s almond industry would be greatly harmed by the application of tariffs on US almonds

The United States is the EU's main supplier of almonds, supplying 89% of in-shell almonds and 92% of shelled almonds in 2023. The EU almond market exceeds €2.1 billion, with Spain, Germany, Italy, the Netherlands, and France being the main importers. In Spain, the almond sector created 1,762 jobs and attracted €93 million in investment in 2024.

Spanish almond production faces challenges such as insufficient volume and a 29% reduction in the 2022/2023 harvest due to drought. The Spanish almond sector is fragmented, with an average of 11 hectares per plot, and 101,553 hectares of arable land are abandoned. A reduction in imports of US almonds due to tariffs will leave a gap in the almond industry that cannot be filled by European almonds or almonds imported from other origins. This will harm the almond processing industries, jobs, investment, and innovation in Europe.

European almonds and US almonds complement each other because they are largely different varieties with different qualities.

Four major California varieties (Nonpareil, Monterey, Independence, and Butte/Padre) make up almost 80% of the U.S. production – none of these varieties are grown in Europe. California varieties tend to be consistent and reliable in terms of physical/sensory attributes for a variety of consumer products. Much of this goes into snacking, bakery, ingredient, and cereals. Most of the European production is used in sweets (nougat, torrone) and to a lesser degree ingredient/snacking. Spanish production tends to be more variable due to crop conditions, making it difficult to satisfy manufacturing and snacking demand in a consistent, long-term fashion with an ample supply of almonds which are uniform in size, shape, and colour (especially important for the snacking industry).

Therefore, placing tariffs on raw US almonds will hurt the European almond processing industry which is very specialised, and centred in Spain and other Mediterranean countries, and it would not benefit the European almond production which largely produces varieties of almonds that complement, the US almond.



Almonds also contribute to the health and nutrition of European consumers, as they are rich in essential minerals and vitamins such as calcium, magnesium, phosphorus, potassium, zinc, copper, manganese, riboflavin and vitamin E. Almonds are also a source of protein, and therefore a great ally for the European Union's efforts within the framework of the "Farm to Fork" strategy and the fight against cancer, which aims to increase the consumption of plant-based proteins.

In conclusion, the signatory associations respectfully ask the European Commission the exemption of 08021110 (fresh or dried bitter almonds in shell), 08021190 (fresh or dried almonds in shell (excl. bitter), 08021210 (fresh or dried bitter almonds, shelled), 08021290 (fresh or dried almonds, shelled (excl. bitter) from the potential list of products which could be subject to possible commercial policy measures.

We would very much like the opportunity to discuss with you further and explore all options to avert the extremely negative impact that these measures would have on EU industry and consumers.

Thank you very much in advance for your kind consideration.

With best regards,

Sebastian Emig

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