

October 30, 2025

Office of the United States Trade Representative  
1724 F Street NW  
Washington, D.C. 20508

**Request for Comments on Significant Foreign Trade Barriers for the 2026 National Trade Estimate (NTE) Report (Document No. USTR-2025-0016)**

Dear Office of the United States Trade Representative (USTR) Trade Policy Staff Committee,

The National Pork Producers Council (NPPC) welcomes the opportunity to provide comments on the USTR annual National Trade Estimate (NTE) report, in response to the Federal Register Notice (Document No. USTR-2025-0016) requesting comments regarding foreign trade barriers to U.S. exports for 2025 reporting.

NPPC represents 42 state producer organizations and the domestic and global interests of more than 60,000 U.S. pork producers. The U.S. pork industry is a major value-added enterprise in the U.S. agricultural economy and a significant contributor to the overall U.S. economy, producing high-quality, safe, and affordable pork. More than 500,000 American jobs are supported by U.S. pork production, and pork exports sustain more than 155,000 of these jobs. The U.S. pork industry ships product to more than 100 countries. Exports contribute significantly to the bottom line of all U.S. pork producers, accounting for more than \$66 in value for each hog marketed in 2024. Last year, the U.S. pork industry exported 3 million metric tons of pork and pork products valued at over \$8.6 billion.

U.S. pork exports face various tariff and non-tariff barriers in markets around the world. As a low-cost, high-quality provider of protein, significant growth in pork exports can be achieved by removing barriers to trade. NPPC recognizes that USTR is currently negotiating trade deals and agreements and is pleased to see recent progress codified in reciprocal trade agreements with Malaysia and Cambodia. Frameworks for trade agreements are in progress with several other key markets including Indonesia, Philippines, Thailand, Vietnam, the United Kingdom, and the European Union; and many issues highlighted in our NTE comments are part of ongoing negotiations and may be resolved before the annual report is finalized. Nonetheless, NPPC believes the countries highlighted in our comments have significant potential for U.S. pork exports if the current, unfair barriers listed below are resolved.

**Angola**

Potential for U.S. pork exports to Angola exists but is limited by clear and persistent market access barriers, including presidential bans and restrictions on agricultural imports. Specifically, a lack of transparency and consistency in issuing import permits stifle U.S. market access in order to protect domestic agricultural production.

### **Australia**

In 2024, the U.S. exported \$328 million in pork and pork products to Australia, but market access remains limited because of sanitary and phytosanitary (SPS) barriers related to Porcine Reproductive Respiratory Syndrome (PRRS). Australia prohibits imports of fresh pork and bone-in products from the United States, even though the United States has provided evidence documenting the safety of U.S. pork products. NPPC has not identified a scientific or legal justification for these barriers and continues to push for unrestricted full market access in Australia.

### **Brazil**

NPPC supports opening the Brazilian market to allow fresh, frozen, and processed U.S. pork to be shipped to Latin America's largest economy, as well as opening a Section 301 investigation to address Brazil's unfair barriers to imports of U.S. pork. Brazil has a *de facto* ban on U.S. pork imports that lacks any scientific justification and must be eliminated. Despite a 2019 joint statement agreeing to establish a science-based process for allowing pork imports, Brazil has still not opened its market to U.S. pork by refusing to negotiate an export certificate and eliminating the need for U.S. pork to be frozen or tested for trichinae. Consistent with the World Organisation for Animal Health (WOAH), U.S. biosecurity programs have already reduced trichinae risk to negligible levels, making Brazil's requirements more trade restrictive than necessary and inconsistent with international standards. While the U.S. is effectively banned from exporting pork to Brazil, Brazilian pork exports to the U.S. have been growing significantly, increasing from \$5.2 million in 2014 to over \$104 million in 2024. NPPC supports fair and reciprocal trade with Brazil.

### **China**

Although China has been an important market for U.S. pork in recent years, there are many restrictions on U.S. pork exports that are inconsistent with international standards. China's onerous facility registration system continues to contribute to unstable market conditions, restricting U.S. export potential. In March 2025, more than 300 pork processing and cold storage facilities had their registrations renewed for another five years. Leading up this, two U.S. pork facilities had their General Administration of Customs of the People's Republic of China (GACC) registration lapse in early 2025 and hundreds more were facing expiration.

China also bans the use of beta agonists, such as ractopamine, instead of following internationally accepted Codex Alimentarius (Codex) Maximum Residue Levels (MRLs). The Phase One Agreement between the U.S. and China required China to conduct a risk assessment for ractopamine in pork, but after more than five years, the ban remains in place, and no risk assessment has been performed. U.S. fresh and frozen pork exports to China are also subject to 25 percent retaliatory tariffs in response to the U.S. Section 232 tariffs on imports of Chinese steel and aluminum. Current tariffs on U.S. pork product exports to China are 57 percent, which puts American exports at a severe disadvantage to imports from competing suppliers. In 2024, over 367,000 tons of U.S. pork were exported to China, worth more than \$1.1 billion. Approximately 55 percent of U.S. pork variety meat exports, including offals, were shipped to China. There is substantial opportunity for U.S. pork export growth in China, if these trade barriers can be resolved.

### **Cote d'Ivoire**

While pork exports to many Muslim-majority countries in Africa are limited, there is potential for U.S. pork exports to Cote d'Ivoire. However, U.S. exports are limited by clear and persistent market access barriers, including a lack of clear import requirements, as well as a lack of transparency and consistency in issuing final regulations without public comment.

### **Ecuador**

U.S. pork faces onerous import licensing schemes that block access in Ecuador. In 2020, the U.S.-Ecuador Trade and Investment Council Agreement (TIC) identified simplification of this process as a goal of the agreement. The opposite has occurred. Since the TIC was negotiated, import permits have been painfully slow to materialize or denied without justification. Furthermore, Ecuador requires domestic purchases prior to assigning import licenses and limits total imports to a predetermined amount, in likely violation of its WTO commitments. Ecuador has also established additional export registration requirements known as "Annex 2." This ambiguous process is further impeding U.S. pork's ability to successfully export to Ecuador. There is additional concern with AGROCALIDAD Resolution 115-2019 and Resolution 003-2016, which require registration of processing facilities for veterinary inputs and for livestock products and byproducts – an expansive and unnecessary scope – to receive import permit authorization. U.S. exports of pork, fresh, chilled, or frozen to Ecuador were \$1.4 million in 2024, and could be expanded further if these trade barriers were remedied.

### **European Union**

In the European Union (EU), U.S. pork must compete with suppliers that have preferential access under free trade agreements the EU has concluded with 20-plus other nations, putting U.S. producers at a significant disadvantage. U.S. pork access is also disadvantaged because the EU does not recognize the equivalence of U.S. pork production practices, nor does the EU accept exports from all USDA-approved facilities. The EU restricts pork through several non-science-based measures, including restrictions on hormones and beta agonists such as ractopamine. Recent introduction of onerous and unnecessary testing requirements for stilbenes and antithyroid use for imports add additional bureaucracy that hinders U.S. pork market access. These restrictions are not based on Codex standards or scientific risk analysis.

NPPC also remains concerned with the EU's intention to implement policies around "sustainable" agricultural production, including the proposed deforestation-free supply chain regulation and "mirror clauses" for the extraterritorial application of EU animal welfare regulations, especially given the bloc's history of disregarding legitimate concerns and input from trading partners. The United States-European Union Framework on an Agreement on Reciprocal, Fair, and Balanced Trade includes an EU commitment to offer preferential market access for a wide range of U.S. agri-food and fisheries products, including pork, and for the U.S. and EU to work together to simplify the sanitary certificate requirements for pork and dairy products. Addressing these non-tariff barriers will help reduce complexity and cost for U.S. exporters. U.S. exports of fresh, chilled, or frozen pork to the EU were \$7.4 million in 2024, while the U.S. imported over \$709 million from the EU in the same period.

### **Honduras**

The Honduran president has publicly discussed renegotiating the agriculture provisions of the Dominican Republic-Central America Free Trade Agreement (DR-CAFTA). Furthermore, the

government has previously required local purchases prior to importing pork from the United States. NPPC notes that DR-CAFTA's pork import provisions were phased in over 20 years. Renegotiating DR-CAFTA to restrict U.S. imports would undermine an important trade relationship and food security in Honduras. Honduran consumers benefited from \$147 million worth of high-quality U.S. pork imports in 2024. However, problems remain, including a discriminatory 15 percent tax applied on certain pork cuts imported with customs documentation in English, while the same cut is exempt domestically.

### **India**

In early 2022, India granted access for U.S. pork and pork products. However, in September 2022, India proposed an additional export certificate with additional attestations that are not relevant to food safety or based on science, nor were they negotiated with U.S. regulatory authorities. Pork exports have been virtually zero since 2022 when access was "granted" and then effectively revoked with the new certificate attestations. Additionally, in February 2023, the Food Safety and Standards Authority of India (FSSAI) introduced new facility registration requirements that are unnecessarily burdensome. NPPC implores USTR to continue working with the Indian government to resolve the export certification issues and burden of facility registration in order to facilitate U.S. pork exports to India.

### **Indonesia**

U.S. pork exports to Indonesia totaled a mere \$3.7 million of mostly frozen pork in 2024. The country has a facility registration approval process that lacks transparency and predictability, and is overly cumbersome, which discourages U.S. pork plants from registering. In addition, Indonesia requires payment to conduct audits, a highly unusual demand. Finalizing and implementing key commitments from the United States-Indonesia Framework on an Agreement on Reciprocal, Fair, and Balanced Trade are key to securing better access to the Indonesian market for U.S. pork producers. As part of the Framework, Indonesia agreed to eliminate approximately 99 percent of tariff barriers for most U.S. products, although public statements from Indonesian officials seemed to indicate that pork may not be included. Indonesia has also agreed to exempt U.S. food and agricultural products from all import licensing regimes and to recognize U.S. regulatory oversight, including listing of all U.S. meat, poultry, and dairy facilities and accepting certificates issued by U.S. regulatory authorities. NPPC encourages USTR to hold Indonesia accountable to these commitments and ensure that pork is included in the final negotiation.

### **Jamaica**

Jamaica has maintained an effective ban on non-hermetically sealed U.S. pork exports for over 30 years. Its limited pork imports from the United States consist primarily of canned ham. There is no science-based justification for this unfair trade barrier. Despite decades of negotiations, Jamaica's ban on U.S. pork remains, while it has granted access to other pork-producing countries, including other countries with the same porcine disease status as the United States, including Canada, the United Kingdom, and the European Union. NPPC strongly supports a science-based approach to trade and the opportunity to compete on a level playing field with countries that have the same commercial swine herd health status. A broadening of access for U.S. products to include fresh and frozen pork would make Jamaica a more significant potential market.

### **Kenya**

Potential for U.S. pork exports to Kenya exists, particularly for hearts and livers. Unfortunately, Kenya effectively bans U.S. pork by providing no clarity on market access provisions. Kenya also maintains complex, nontransparent, and costly requirements for the importation of all meat, dairy, and poultry products, which effectively deters imports.

### **Korea**

Korea eliminated its policy of recognizing veterinary drug residues for the same tissue of a similar species and no longer accepts Codex Alimentarius MRLs for veterinary drugs. Beginning January 1, 2024, Korea implemented its new Positive List System, referencing only domestic MRLs or import tolerances (IT) for veterinary drugs in beef, pork, chicken, eggs, milk, and fishery products. In the absence of a Korean MRL or IT, antimicrobial products will be subject to a 0.01 ppm residue tolerance. For growth supplements and steroid type anti-inflammatory drugs, a standard of “nondetection” applies. Industry can submit applications for IT or higher MRLs for veterinary drugs through the Ministry of Food and Drug Safety (MFDS) Public Portal Service. There is potential for eight trade barrier issues related to the MRLs for U.S. animal products, though it is not clear if issues will arise with U.S. shipments.

### **New Zealand**

U.S. pork imports are limited in New Zealand because of unfounded and unscientific concerns about disease transmission, such as PRRS. However, the WOH chapter on PRRS states that the disease is not transmissible through legal trade in pork products, and all products should be allowed without restrictions. Currently, pork can only be imported if it is cooked, cured, canned, in consumer-ready packages of less than 3 kg, or destined for further processing. U.S. exports of cooked, cured, or canned pork to New Zealand totaled just over \$47 million in 2024. NPPC is seeking elimination of non-science-based restrictions on imports of U.S. pork and pork products.

### **Nigeria**

While Nigeria began allowing pork sausage imports from the U.S. in early 2022, it has maintained an express prohibition against the importation of raw pork (all swine-related tariff lines under Harmonized Tariff Schedule (HTS) 0203, 0206, and 0210.10), as well as other meats and associated products. Nigeria’s restrictions against U.S. pork products are non-science based, clearly violate General Agreement on Tariffs and Trade (GATT) Article XI.1, and must be eliminated. NPPC encourages USTR to press for unrestricted full market access without any mitigations for U.S. pork exports to Nigeria.

### **Panama**

In 2020, the Ministry of Health issued Decree 255, requiring facility registration for establishments that store, display, distribute, or sell meat and meat products. This has caused major delays in U.S. pork facility registration. On January 10, 2024, the Panamanian government issued a decree to protect domestic pork producers from the economic effects of imports. The decree authorizes import control measures through the establishment of an import quota of 8,791 metric tons for 2024. The quota will grow by 6 percent in each subsequent year. Existing tariff rate quota (TRQ) access under Panama’s various international trade agreements will count against the overall quota of 8,791 metric tons. Article 3 of the decree says that the difference between the annual quotas under Panama’s existing trade agreements and the total import volume ceiling (8,791 metric tons in 2024) are subject to an import licensing system that will be administered by the Trade Policy Unit of the Ministry of Agricultural

Development. In effect, the measure places a limit on how much U.S. pork can enter Panama under over-quota tariff conditions. The preferential over-quota tariff rate for U.S. pork lines under the FTA TRQ (except carcasses and half-carcasses) was 15.6 percent in 2024 (year 13 of the agreement). On January 1, 2026, the over-quota rate is scheduled to reach zero under the agreement. This decree is not consistent with Panama's market access commitments under the FTA or restrictions on quantitative limits applicable under the WTO, nor did Panama give notification of these measures under either agreement. In short, the Panamanian government has removed market access for U.S. pork.

Panamanian leaders have also discussed renegotiating aspects of the U.S.-Panama Trade Promotion Agreement, including pork market access. NPPC supports the original agreement, compliance with its terms, and full implementation of negotiated commitments on both sides.

### **Philippines**

The Philippine government in June 2024, reduced the in-quota tariff on pork to 15 percent (from 30 percent) and the out-of-quota rate to 25 percent (from 40 percent), effective July 1, 2024, until December 31, 2028. Those reduced duty rates have been extended three times and are in place through the end of 2028. The Philippines raised the minimum access volume (MAV) quota for imported pork cuts to 254,210 metric tons (MT) from 54,210 MT in 2021. The MAV Plus, which expired January 31, 2022, resulted in U.S. pork exports to the Philippines soaring in 2021, topping \$213 million, compared to \$121 million in 2020, a 76 percent increase. However, U.S. exports fell to \$142 million in 2022 without the expanded MAV, and fell further to \$114 million in 2023. Exports increased to \$126 million in 2024 because of rising sales of variety meats and offals, which have a lower duty of 10 percent. The Philippines has battled ASF since 2019, and imports of pork have soared and are set to hit record levels in 2025. In 2024, Brazil became the largest exporter of pork to the Philippines as a result of low prices and increased market access due to a systems accreditation granted for its pork plants. The Philippines is now Brazil's largest market for pork products.

NPPC has pressed both the U.S. and Philippines governments to lower pork import tariffs and increase MAV for pork since ASF outbreaks began in the country in 2019.

### **Russia**

Russia has doubled its production of pork since 2010 and shifted from being a major pork importer to a net exporter. It has maintained a ban on pork imports from the United States since 2014. These are political restrictions unrelated to any health or safety concerns.

### **Singapore**

While the Singapore market is technically open to U.S. pork exports, there are several SPS issues that cause problems in the market. These include application of the 2022 regulations on pathogen reduction treatments, trichinae mitigation requirements, and non-scientific shelf-life requirements. NPPC supports eliminating obstacles to trade that are not based on sound science to enhance U.S. access to the Singapore market.

### **South Africa**

South Africa has a partial ban on U.S. pork and pork products. NPPC wants full market unrestricted access for U.S. pork, including offal, heat-treated products, and casings for export to South Africa. This

can be a growing market for U.S. pork producers, but exports are hampered by unwarranted, non-scientific restrictions. These restrictions include no market access for pork offal, heat-treated/canned products, and casings; no guidance for the unjustified requirement that lymph nodes must be removed from shoulder cuts; stringent, non-science-based, trichinae-related freezing requirements; and limits on pork cuts allowed for importation because of concerns related to PRRS and the pseudorabies virus. These restrictions do not recognize animal health controls in the United States, including disease status, and are not compliant with international standards.

### **Taiwan**

NPPC is deeply concerned about the effects of the 2021 country-of-origin labeling (COOL) requirements for pork. These were introduced to coincide with new MRLs for ractopamine use in pork production, with resulting negative impacts on U.S. pork exports. While pork exports recovered to more historical levels in 2023, they dropped again in 2024 to about \$24 million and continue to lag in 2025 after Taiwan instituted batch-by-batch inspections and testing at port and in the marketplace following a COOL mislabeling incident by a domestic processor utilizing U.S. pork as an ingredient. While the inspections apply to pork from all trading partners, only U.S. pork was targeted by a media disinformation campaign that accompanied the announcement. NPPC seeks the elimination of Taiwan's batch-by-batch testing and inspection requirements given there have been no reported MRL violations or COOL mislabeling incidents by U.S. exporters. NPPC also seeks a commitment from Taiwan's regulatory agencies to improve risk communications on the safety of adopted MRLs for ractopamine and to make public statements when media claims are false and misleading to reassure its consumers.

### **Thailand**

Thailand maintains a *de facto* ban on U.S. pork imports. It also has not established MRLs for ractopamine, though an MRL has been adopted by Codex since 2012. Despite removing some duty-free trade preferences under the Generalized System of Preferences (GSP) program, Thailand has not made progress to open its market to U.S. pork (likely in part because GSP is currently expired).

### **Vietnam**

In 2020, Vietnam reduced its Most Favored Nation tariff rates from 15 percent to 10 percent for frozen pork product imports. NPPC is pleased with this reduction, but the tariff rate remains higher than the rates for competitors like the European Union, Russia, and Canada – which have trade agreements with Vietnam. While its market is technically open to U.S. pork, Vietnam continues to place restrictions on the import of "white offal," which includes products like intestines, spleens, and tongues, through a combination of quarantine requirements, port restrictions, and certification requirements that limit U.S. pork producers' ability to capitalize on Vietnam's need for pork variety meat. Additionally, onerous facility registration requirements, including requests for sensitive business information, are a barrier to trade. On July 2, 2025, President Trump announced that the U.S. and Vietnam reached agreement on a trade deal, however, details of the agreement for U.S. market access into Vietnam are still unclear. A trade agreement with Vietnam remains a top priority for U.S. pork producers, especially as the country battles ASF and needs safe, reliable, and affordable sources of pork.



The Global Voice for  
the U.S. Pork Industry

NPPC appreciates the opportunity to comment on countries and issues for the NTE 2026 Report and looks forward to continuing to work with USTR and other U.S. government agencies to open and maintain market access for U.S. pork and pork products.

Thank you for your consideration.

A handwritten signature in blue ink, appearing to read 'M. Zieba', written in a cursive style.

Maria C. Zieba  
Vice President of Government Affairs