

December 1, 2025

Office of the United States Trade Representative
Jamieson Greer
U.S. Trade Re
1724 F Street NW
Washington, D.C. 20508

Request for Comments on Initiation of Section 301 Investigation: China's Implementation of Commitments Under the Phase One Agreement (Docket Nos. USTR-2025-0007, USTR-2025-0020)

Dear Ambassador Greer,

The National Pork Producers Council (NPPC) welcomes the opportunity to provide comments on the USTR's "Initiation of Section 301 Investigation: China's Implementation of Commitments Under the Phase One Agreement" notified in the Federal Register Notice (Document No. USTR-2025-0007, USTR-2025-0020).

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 U.S. pork exports can be achieved by removing barriers to trade. With regard to tariffs, China currently imposes a 47 percent tariff on U.S. pork exports, which was recently reduced by 10 percent after robust Administration negotiations with the Chinese. However, pork exports are down 13 percent in the first seven months of 2025 due to the retaliatory tariffs China has imposed, which is a trend NPPC hopes can be reversed through continued USTR negotiations in order to ensure the competitiveness of U.S. pork exports in the Chinese market.

China's long-standing ban on the use of beta-agonists, such as ractopamine, is a prime example of a non-tariff barrier that adversely impacts U.S. pork exports. The Chinese ban on ractopamine lacks scientific basis and is inconsistent with international standards for Maximum Residue Levels (MRLs) established by the Codex Alimentarius Commission (Codex). The U.S. has long sought to work with China to develop a science-based path forward to alleviate the ban on beta agonists and established a

roadmap to address the issue of ractopamine use in cattle and swine in the Phase One Agreement. Specifically, the Agreement stipulated:

“In consultation with U.S. experts, China shall conduct a risk assessment for ractopamine in cattle and swine as soon as possible without undue delay, and in a manner consistent both with Codex and FAO/World Health Organization (WHO) Joint Expert Committee on Food Additives (JECFA) risk assessment guidance and with the risk assessment for ractopamine previously conducted by the FAO/WHO JECFA. The risk assessment shall be based on verifiable data and the approved conditions of ractopamine use in the United States. China and the United States shall establish a joint working group to discuss the steps to be taken based on the results of the risk assessment.”

China is an important market for U.S. pork. 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, however, the ban on ractopamine stymies export volumes and adds costs that are borne across the American supply chain by producers, processors, packers and exporters.

The Phase One Agreement reflected an important step forward to solving this long-standing issue and enhancing U.S. exports. Unfortunately, five years since the Agreement entered into force, the ban remains in place, and no risk assessment has been performed. NPPC believes China should adhere to international standards set forth by Codex and the U.S government should hold China accountable to the commitments made in the Phase One Agreement, including their obligation to engage in a science-based process to establish MRLs for ractopamine use in swine.

NPPC appreciates the opportunity to comment on USTR’s “Initiation of Section 301 Investigation: China’s Implementation of Commitments Under the Phase One Agreement.” NPPC looks forward to continuing to work with USTR to address China’s tariff and non-tariff barriers that hinder competition and full market access for U.S. pork and pork products.

Thank you for your consideration.



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Vice President of Government Affairs