

February 20, 2026

The Honorable Luke Lindberg
Under Secretary for Trade and Foreign Agricultural Affairs
U.S. Department of Agriculture
1400 Independence Avenue, S.W.
Washington, D.C. 20250

Dear Under Secretary Lindberg,

Thank you for meeting with members of the U.S. Agriculture Coalition for WTO Reform last year. We greatly value your candor and partnership on issues important to U.S. agriculture at the World Trade Organization (WTO). In response to your requests, we have provided actionable ideas for your consideration in the document attached to this letter. We also took note of the December U.S. submission on WTO reform at the WTO General Council and discuss some of the points raised by the United States that are relevant to the U.S. agriculture sector.

This coalition broadly supports the WTO because the agreements provide more predictable market access and have reduced trade distortions in agricultural markets. The rules of the WTO are extremely important to U.S. agriculture, and we believe that U.S. leadership within the WTO is an important part of the future success of the U.S. agricultural sector. Continued engagement by the U.S. government can bolster the Administration's export-focused objectives, specifically by expanding U.S. priorities on a range of technical topics within standing committees and consultation mechanisms.

WTO rules pertaining to agricultural exports have been extensively negotiated, defined, and applied across nearly all major current and future export markets of interest. The disciplines established through these negotiations provide a basis from which the United States can engage trading partners in bilateral negotiations, and an even fuller suite of enforcement tools from which the United States can draw. Continued U.S. monitoring and engagement at the WTO can also support a bilateral trade agenda for agriculture when used strategically.

As Ambassador Greer recently stated, the bilateral negotiations under the Administration's agreements on reciprocal trade framework are "layering over the WTO commitments," reflecting the Administration's commitment to eliminating trade barriers to U.S. exports that do not comply with WTO rules. These negotiations, combined with the United States' existing bilateral and multilateral trade agreements, are important to the U.S. agricultural sector and drive U.S. exports. Alignment between these agreements and WTO rules, such as commitments on agricultural subsidies, sanitary and phytosanitary (SPS) measures, and other non-tariff barriers, plays an important role in securing meaningful export opportunities for U.S. farmers.

We welcome the opportunity to discuss our ideas with you and look forward to continued collaboration as you advance the U.S. WTO reform agenda.

Sincerely,

U.S. Agriculture Coalition for WTO Reform

Coalition Perspectives on WTO Reform and Practical Recommendations

WTO Reform

The coalition agrees with much of the December U.S. submission on WTO reform at the WTO General Council. This section highlights a few areas where we are eager to work with the Administration to both create opportunities and mitigate potential negative impacts to the U.S. agriculture sector. Regarding specific WTO reform issues discussed by the United States, we encourage the following:

- Build support for replacing the current self-declaration approach to developing country status with a framework based on objective graduation criteria.
- Pursue plurilateral agreements as a pathway for improved decision-making, including on agricultural issues.
- Resume pushing a previous proposal from the United States to impose timely and appropriate penalties on those countries that persistently refuse to meet their notification obligations.
- To protect markets for U.S. agricultural exports, prevent the discriminatory application of non-tariff measures and protect, in particular, the core provisions of the SPS and TBT agreements that derive from the most-favored-nation and non-discrimination principles of the GATT.
- Press for the application of SPS- and TBT-plus measures in regional and plurilateral negotiations covering agricultural imports, with any differences in treatment based on science and relevant data.
- Continue to fund the WTO Secretariat, but ensure that the WTO leadership refrains from steering the substance of agricultural negotiations by, for example, encouraging compromises that would significantly weaken the disciplines on market price support contained in the current Agreement on Agriculture.
- Actively work toward a solution on “essential security” to discourage trading partners from invoking GATT XXI to justify tariffs and non-tariff barriers or other trade-distorting measures that discriminate against U.S. agriculture due to so-called “food security” concerns. The U.S. communication from December 2024 (JOB/DSB/10) is a helpful starting point.
- Take WTO compliance into account when dealing with these countries in other contexts, such as reciprocal trade negotiations.

Regarding the section of the U.S. submission on problems the WTO cannot address, state-driven overcapacity and overconcentration also affect U.S. agriculture and are not limited to non-market economies such as China. Many WTO members face agricultural overcapacity driven by WTO-inconsistent policies, and the WTO can be a useful forum for building coalitions on specific issues, as outlined in that section.

Beyond the WTO reform topics raised by the United States relevant to agriculture, the coalition also provides below several specific recommendations to improve the WTO's usefulness to U.S. agriculture in the near term.

Notifications

Member notifications of policy changes and proposed changes are important but wide differences in the quantity and quality of timely, transparent, and user-friendly notifications endure.

Recommendations

- Prioritize meeting transparency obligations with timely, real consequences for failure to comply, as in earlier versions of JOB/CTG/14.
- Explore how to encourage expanded windows of compliance for non-emergency measures; for example, by evaluating whether 45-60 day notification windows remain a realistic timeframe for comment periods, given the increasing number of WTO members and the technical complexity of agricultural supply chains.
- Improve the usefulness of notifications by advocating for enhanced transparency at the WTO (e.g., notifications should provide sufficient time for governments to respond and engage with the notifying

government) while simultaneously better coordinating among overseas posts, Washington-based policy analysts, and industry to respond earlier and more effectively.

- Review transparency obligations at the WTO committees relevant to food and agriculture, with the objective of making them more relevant or user-friendly for governments and the private sector (cf. the updated notification requirements in the TBT Committee).
- Take notification compliance into account when dealing with these countries in other contexts, such as reciprocal trade negotiations.

Committees

Despite political issues that may be raised repeatedly in WTO Committees to little effect, the fact remains that WTO Committees continue to provide a useful venue for engagement on trade barriers in a manner that allows for transparent objections, observation by third countries, and at times, brings resolution to the matters at hand.

Recommendations

- Engage in discussions to advance U.S. perspectives on topics like environment-related trade measures, to better prevent novel trade barriers that will affect U.S. exports.
- Consider utilizing the chat function of the WTO ePING system to engage bilaterally outside of Geneva when responses to notification concerns from foreign governments are unresponsive to concerns raised. This could help give access to capital-based officials who may not be as responsive through normal Geneva channels.
- Prioritize advancing, as appropriate, evidence-, data-, science- and risk-based approaches (including on agricultural policies, human and animal health and safety and environmental factors) to trade through thematic sessions, side events, and committee activities.
- Firmly oppose non-science-based approaches (including discussion topics, events, and activities), especially those actively advanced by the European Union.
- Expand the use of counter-notifications in the Agriculture Committee to highlight issues created by non-compliance.

Negotiating Agenda

For now, a reinvigorated negotiating agenda seems unattainable given the vast differences in objectives between members and a few major agricultural producers that repeatedly violate the existing agreements. However, we still support reform to reduce distortions in agricultural markets consistent with Article 20 of the Agreement on Agriculture. Consistent with that objective, we recommend that the United States continue to support the following positions on the agriculture negotiations:

- Pursue market-based trade liberalization in agriculture that reduces distortions and enhances transparency.
- Reset the agriculture negotiations, which have been stuck in the same paradigm for many years, to better understand and focus on the current issues affecting agricultural trade.
- Oppose a “permanent solution” for market price support/public stockholding that is inconsistent with Article 20 long-term objectives, e.g., updates to fixed external reference prices to weaken disciplines on trade-distorting market price support or new special safeguard mechanisms.
- Continue to engage with other members to highlight the problems with trade-distorting domestic support and the imbalance in market access commitments across the membership.
- Ensure that any new disciplines on domestic support are accompanied by commensurate disciplines on market access, including that developing country agricultural exporters meet the same level of ambition as developed countries, with a graduation process for developing countries.

The coalition also provides the following recommendations for WTO negotiations outside the traditional agriculture negotiations:

- Eliminate the self-declaration of developing country status for the purposes of special and differential treatment and negotiate a graduation framework based on objective criteria.

- Explore plurilateral talks on agriculture that build on existing disciplines, while recognizing that some members will necessarily have to curtail their ambition without some of the largest agriculture producers (e.g., China, India) participating in an agreement.
- Work with other members to submit proposals to implement the ideas discussed in the U.S. WTO reform submission. Push for steady progress, while avoiding overly prescriptive work plan timelines, through regular stocktaking of reform topics emerging from the ministerial.

Enforcement

WTO dispute settlement has become too litigious and no longer serves as a forum for negotiations. Much more frequent use of the Dispute Settlement Understanding's (DSU) consultation mechanism under Article 4 provides a meaningful alternative for addressing agricultural trade issues beyond simply repeating concerns in committees. In the past, the U.S. government has been understandably hesitant to use the dispute settlement mechanism for issues with a lower monetary value, but stakeholders see value in bringing an issue to consultations as an additional means to resolving issues without years-long litigation.

Recommendations

- Continue to prioritize the use of specific trade concerns (STCs) in the SPS and TBT committees. For committees without an STC mechanism (e.g., the Committee on Agriculture), consider adding an equivalent mechanism to help the private sector and governments better track these issues over time. Addressing these issues through STCs can support U.S. bilateral negotiations on market access and lay the groundwork for further enforcement.
- Use the *ad hoc* consultations mechanism under SPS 12.2 to continue elevating SPS issues where progress has not been made through STCs.
- Use the Article 4 consultation mechanism under the DSU as a tool for enforcement and negotiations.
- For issues that cannot be resolved through consultations, decide whether to use the panel process or address them bilaterally.