

November 3, 2025

VIA COMMENTS.USTR.GOV**PUBLIC DOCUMENT**

Ambassador Jamieson Greer
U.S. Trade Representative
Office of the United States Trade
Representative
600 17th Street NW
Washington, DC 20006

Re: Docket No. USTR-2025-0004 – Request for Comments Relating to the Operation of the Agreement Between the United States of America, the United Mexican States, and Canada, 90 Fed. Reg. 44869 (Office of the United States Trade Representative, September 17, 2025)

Dear Ambassador Greer,

The National Pork Producers Council (NPPC) welcomes the opportunity to provide comments on the Office of the United States Trade Representative's review of the Operation of the Agreement Between the United States of America, the United Mexican States, and Canada. This submission is in response to the Federal Register Notice Document No. USTR-2025-0004.

NPPC represents 42 state producer organizations and the domestic and global interests of more than 60,000 U.S. pork operations. 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 more than **28 billion pounds** of high-quality, safe, and affordable pork in 2024. More than **500,000 American jobs** are supported by U.S. pork production, and U.S. pork exports sustain more than 155,000 of these jobs. In any given year, 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 of 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**.

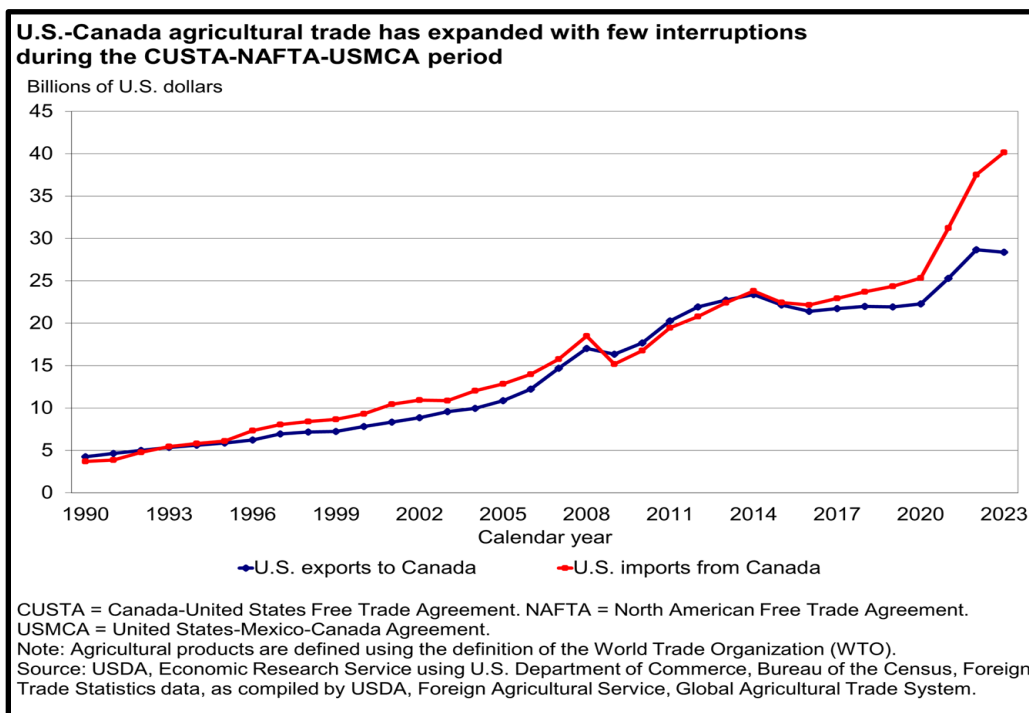
The U.S.-Mexico-Canada Agreement's Role in American Agriculture

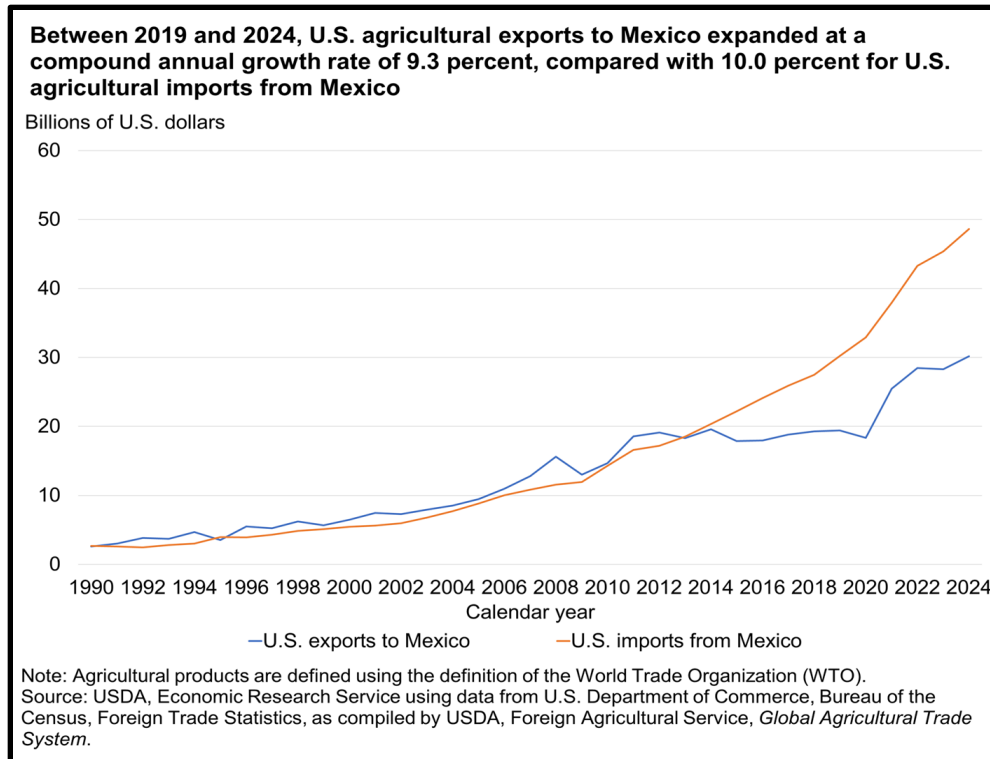
NPPC strongly supported the adoption of the United States-Mexico-Canada Agreement (USMCA) in 2020, because it preserved the benefits of the North American Free Trade Agreement (NAFTA), while also addressing key issues for the industry. The USMCA maintains the crucial zero-tariff access for U.S. pork to Mexico and Canada and includes robust Sanitary and Phytosanitary (SPS) and Technical Barriers to Trade (TBT) chapters, which provide evidence-

based frameworks and strong enforcement mechanisms to challenge non-tariff trade barriers. By solidifying these trading relationships, USMCA will continue to ensure the health and stability of the deeply integrated North American pork supply chain, which supports hundreds of thousands of jobs and adds significant value to each hog marketed.

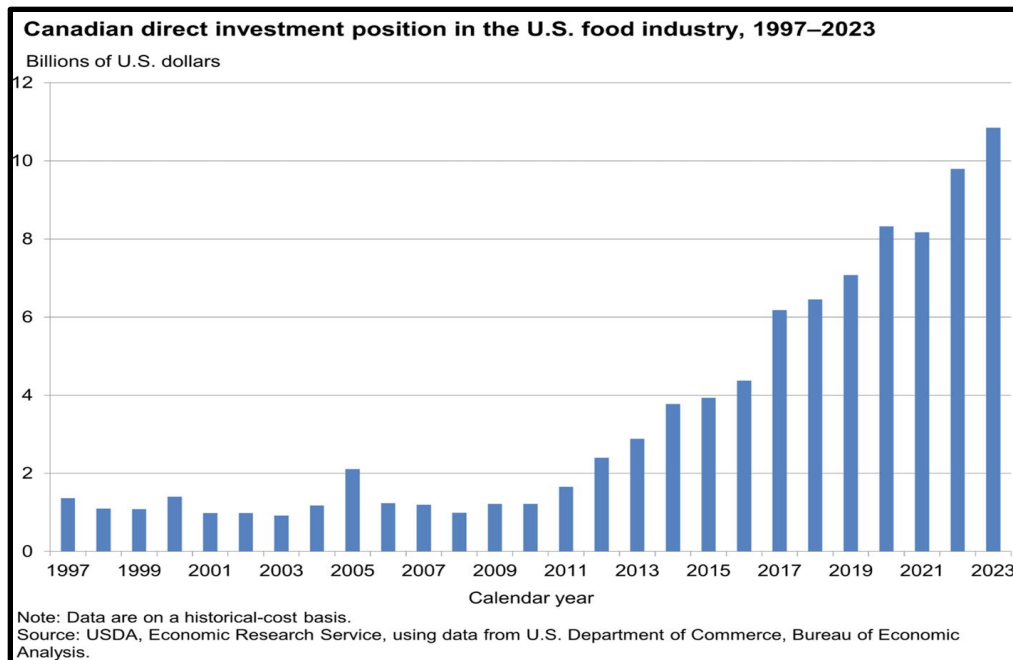
Under the USMCA, North America's position as a critical region for global food security has been realized, fostering the largest trilateral agricultural trade relationship worldwide. The USMCA has been vital for U.S. agriculture, stabilizing trade rules, reducing border uncertainties, and enhancing market access. These factors empower U.S. farmers, ranchers, and agribusinesses to plan investments, scale production, and compete globally. Agricultural supply chains across North America are even more deeply integrated than under the NAFTA agreement, allowing raw inputs, live animals, and processed foods to flow freely, which promotes efficiency and specialization. Preserving these benefits remains a top priority of our industry, which serves farmers across the North American continent.

In 2024, U.S. agricultural exports reached approximately \$176 billion. Mexico was the top market, importing \$30 billion (17%), with Canada closely following at \$28 billion (16%). Together, these two neighbors account for over 33% of U.S. agricultural export value, underscoring their critical importance.





The USMCA's integration helps U.S. agriculture rely on these close neighbors, reducing dependence on volatile, distant markets and benefiting producers across various sectors. The supply chains across North American meat and livestock industries are highly integrated, with a significant degree of cross-border ownership of meat processing industries. These, in turn, service the needs of the integrated North American food retail and foodservice industries. The U.S. Department of Agriculture's Food Safety and Inspection Service (FSIS) has determined that Canada's inspection system is equivalent to the U.S. system, viewing it as "virtually identical" to their own. Because of this determination, the United States has implemented "streamlined" border inspection procedures. Instead of unloading and inspecting every shipment, FSIS conducts spot checks and random inspections. As a result, Canada has invested heavily in the U.S. industry, with those investments continuing to grow under the USMCA.

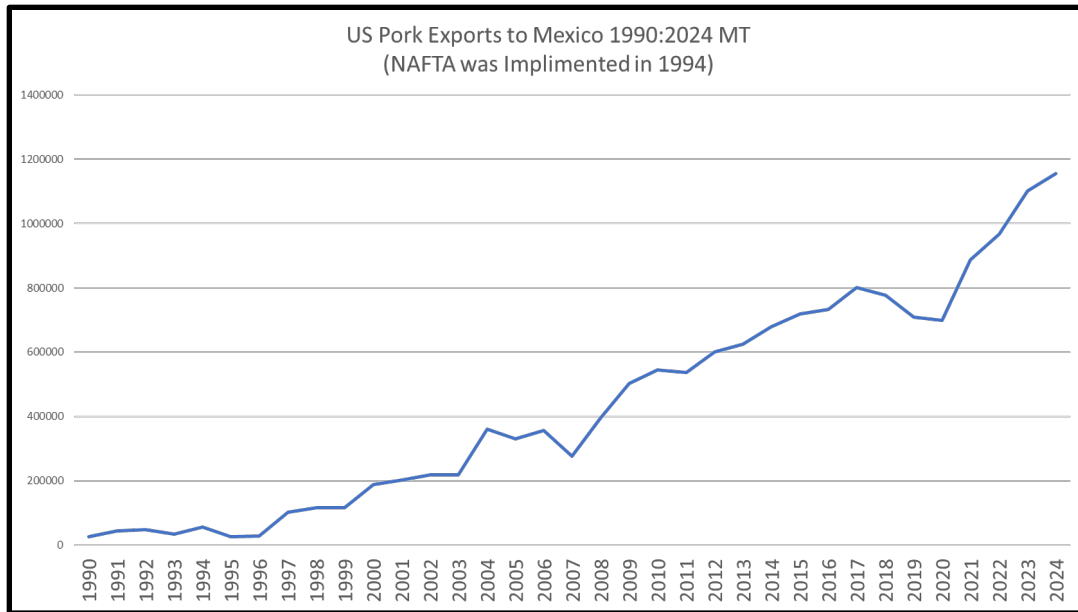


For the U.S. pork sector, the USMCA has been instrumental in ensuring long-term success. In 2024, the United States exported nearly \$2.6 billion of pork to Mexico and almost \$853 million to Canada, making them the No. 1 and No. 4 export markets, respectively.

With the productivity of U.S. agriculture growing faster than domestic demand, the U.S. food and agriculture industry—and the rural communities that depend on it—rely heavily on export markets to sustain prices and revenues. Disrupting U.S. agricultural exports to Mexico and Canada would have devastating consequences for American farmers and the many American processing and transportation industries and workers supported by these exports.

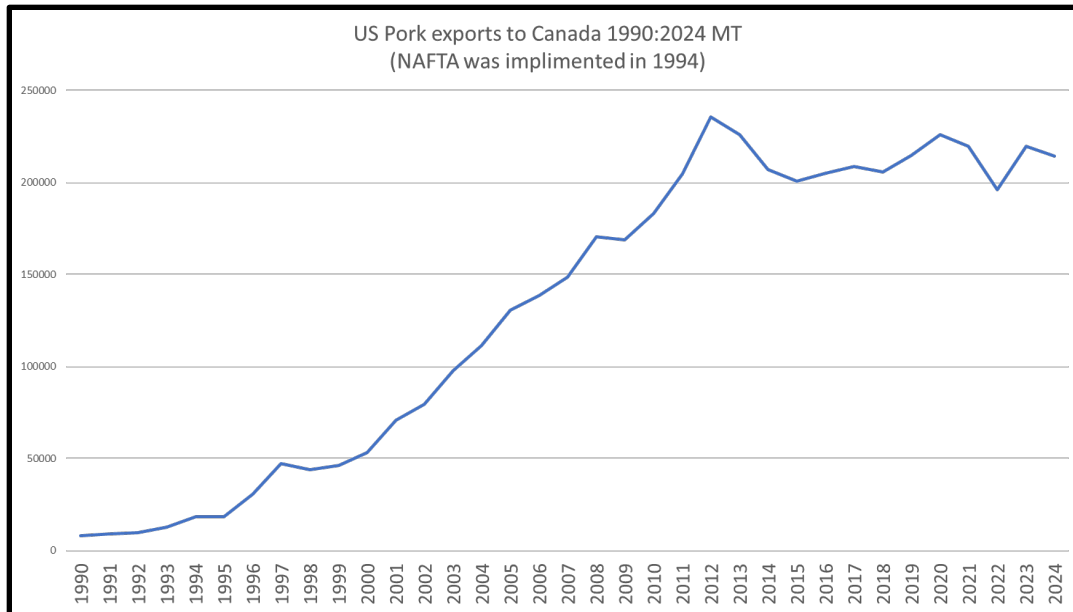
Mexico now buys 9% of all the pork and 50% of the hams produced in the United States. These hams are exported bone-in and in large combos (not individually boxed). This is critical for U.S. pork producers since the United States does not have the boning capacity or the consumer demand for its domestic production of hams.

Mexico is also the second largest buyer of U.S. pork variety meats for which there is little demand in the United States. Mexico's large-scale processing industry uses these cuts to produce a variety of value-added products like deli meats, sausages, and traditional cured pork products, maximizing returns for U.S. producers. The Mexican market is a vital backstop when China decreases its purchases of U.S. variety meats, as it did in 2025.



Canada buys 1.7% of all pork produced in the United States. These imports consist largely of loins, which are the largest primal on a pork carcass and one of the weakest primals in terms of U.S. domestic demand. Canada exported over \$560 million of live swine in 2024,

primarily to U.S. Midwest facilities for finishing and slaughter. Much of the resulting pork then returns to Canada as U.S. pork exports, demonstrating a mutually beneficial two-way trade for both countries, producers, and consumers. The movement of feeder pigs south from Canada – and bone-in hams from the United States to Mexico – shows how integrated these industries have become.



In addition to the zero-tariff access for USMCA originating products, the USMCA includes enhanced SPS and TBT obligations. These often-overlooked provisions are crucial for agricultural trade. By establishing clear, science- and technical-based SPS and TBT commitments, the USMCA prevents arbitrary trade barriers that could disrupt pork product flow. This assures U.S. pork producers that their products, once meeting agreed-upon measures, will not face unexpected border restrictions. This regulatory alignment reduces trade friction and improves overall supply chain efficiency, benefiting both exporters and importers.

Despite the strong SPS framework, challenges can arise, such as Mexico's attempts to restrict imports of genetically engineered corn, which ran counter to decades of evidence demonstrating the safety of agricultural biotechnology. The USMCA SPS and dispute settlement chapters ensured the United States had the appropriate tools to respond, resulting in Mexico formally repealing the contested measures, underscoring the critical role that USMCA provides in addressing and preventing trade barriers.

Chapter 28 of the USMCA establishes a Committee on Good Regulatory Practices to monitor and exchange information on regulatory practices and processes of each country. The Committee can also be used as a platform for matters and positions in advance of meetings in international fora. Our three countries share significant common ground in international policymaking through bodies like the Codex Alimentarius, the World Organization for Animal Health, and the World Trade Organization. Historically, our countries have been closely aligned on issues vital to agricultural producers, and we are eager to see this collaboration continue.

This platform should be used to further streamline and facilitate trade in the North American market.

The USMCA also incorporates provisions for intellectual property rights and genetic resources, which can drive advancements in pork genetics and breeding. Although less direct than tariff elimination, strong intellectual property protections incentivize research and development in animal agriculture, leading to healthier, more efficient, and more sustainable pork production. This can give U.S. pork a competitive edge in global markets, as consumers increasingly seek high-quality, responsibly produced products.

Recommendations

Maintain the Agreement

NPPC supports the USMCA and encourages all three countries to maintain the agreement in its original form and extend the agreement to another 16-year term. The USMCA maintains crucial zero-tariff access for U.S. pork to Mexico and Canada and includes robust SPS and TBT chapters, which provide a science-based framework and a strong enforcement mechanism to challenge non-tariff trade barriers. By taking such measures, the U.S. pork industry will ensure certainty in its first and fourth largest export market.

Maintain Tariff-Free Access and Predictability

While we appreciate the Trump Administration's efforts to reduce market distortions caused by non-reciprocal policies in other countries, the reciprocal tariffs have influenced the integrated supply chain shared between the United States, Canada, and Mexico. Through July 2025, U.S. exports of pork to Canada have dropped 15% in value to about \$404 million. U.S.-Canada trade received a boost in August when Canada confirmed the removal of a 25% retaliatory tariff on U.S. sausages. The tariff, in place since early March, had a significant negative impact on sausage exports.

Pork often is targeted for retaliation by foreign countries for U.S. tariffs applied on non-agricultural goods. During the first Trump Administration, following the findings of a Section 232 investigation, the U.S. government-imposed tariffs on imported steel and aluminum from Canada and Mexico, citing national security concerns. Mexico, in turn, announced retaliatory tariffs of 10 to 20% on various pork products, including hams and shoulders, which are key exports for the United States. The tariffs remained in effect through May of the following year, and during that time, U.S. exports fell about 25% before the tariffs were withdrawn. It remains important to limit instances where agricultural products may be targeted to resolve other areas of trade inequity in the North American market, which is already providing stability in other markets where agricultural trade is being impacted.

Further Streamline and Facilitate Trade

NPPC encourages the Administration to utilize the Committee on Good Regulatory Practices established under Chapter 28 of the USMCA to further streamline and facilitate trade in the North American market when outbreaks of animal diseases occur. In the event of a significant animal disease outbreak in the United States, such as African swine fever or Porcine Reproductive and Respiratory Syndrome, exports of U.S. pork to Canada and Mexico would shift from standard requirements to stricter, regionalization protocols. The Committee could be used to fast-track agreement among regulatory agencies and keep trade flowing uninterrupted.

Conclusion

The economic stability provided by the USMCA is a major asset, encouraging innovation and growth across the entire agricultural value chain. American pork producers are particularly well-positioned to continue their success in the lucrative North American market, significantly contributing to the nation's economy and food security. NPPC requests that, as part of the review, USTR maintain the duty-free preference in the USMCA markets while upholding strong science-based standards for imports. The USMCA has truly been a path to sustained growth and prosperity for American pork producers.

NPPC appreciates the opportunity to provide comments and supports the continuation of the USMCA.

Sincerely,



Maria C. Zieba
Vice President of Government Affairs

Attachment: Letter from U.S. Food and Agriculture Industry Associations including NPPC and state pork producer affiliates.