

April 15, 2026

Jennifer Thornton  
General Counsel  
Office of the United States Trade Representative  
600 17th Street NW, Washington, DC 20508  
Submitted via Regulations.gov

**Re: Section 301 Investigations: Acts, Policies, and Practices of Certain Economies Relating to Structural Excess Capacity and Production in Manufacturing Sectors: Request for Public Comment and Announcement of Public Hearing; Docket ID No. USTR-2026-0067; 91 FR 12886 (March 17, 2026).**

Dear Ms. Thornton:

The National Pork Producers Council (NPPC) submits these comments in response to a Federal Register notice, dated March 17, 2026, requesting comments on excess capacity and production in manufacturing sectors of several countries.

NPPC represents 43 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 2025.

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 2025. Last year, the U.S. pork industry exported 2.9 million metric tons of pork and pork products valued at nearly \$8.4 billion.

NPPC believes caution should be exercised relative to the imposition of broad Section 301 tariffs due to their detrimental impact on U.S. farmers and the complex global supply chains they rely on. While the industry acknowledges the challenges of state-sponsored overcapacity and supports efforts to combat unfair trade practices, pork producers are concerned about unintended negative consequences for U.S. pork producers. NPPC recognizes that the Administration is utilizing these tariffs to protect domestic manufacturing sectors such as steel, aluminum, and semiconductors, but is apprehensive that the agricultural sector—specifically pork—often becomes a victim of foreign retaliation.

The pork industry is historically the primary target in trade disputes involving manufacturing. Because pork is a high-value, politically sensitive commodity, trading partners often impose retaliatory duties on U.S. pork to exert maximum political pressure on the U.S. government. During the 2018–2019 Section 301 and 232 disputes, U.S. pork faced retaliatory tariffs as high as 62% to 70% in China, leading to an estimated annualized loss of nearly \$646 million in exports. Further, once a trade partner shifts its

sourcing to competitors like Brazil or the EU due to retaliatory tariffs, regaining that market share is difficult and costly, even after tariffs are lifted. Markets like Vietnam and Thailand are critical for future pork export growth as their middle classes expand. Placing them under Section 301 scrutiny invites counter-measures that could lock U.S. producers out of these emerging regions for a years. In addition, the U.S. domestic market has limited demand for "variety meats" (offal, feet, etc.). These products are almost entirely exported to the very countries targeted in overcapacity investigations. Without these export outlets, the value of every hog processed in the U.S. drops significantly. Major competitors, specifically Brazil, are notably absent from the current investigation list. Retaliatory tariffs against the U.S. create a vacuum that Brazil is poised to fill. Once trade flows are rerouted and long-term contracts are signed with Brazilian suppliers, U.S. producers may never regain that market share, even if tariffs are later rescinded.

Tariffs on structural overcapacity typically target industrial inputs like steel and aluminum, which are essential for pork production infrastructure. Increased costs for steel and aluminum directly inflate the price of building and maintaining modern hog barns, fencing, and processing equipment. Tariffs on manufacturing components can increase the cost of refrigeration units and tin-plated steel for canned pork products, further squeezing the tight margins of U.S. processors who are already facing high labor and feed costs.

A primary concern is that Section 301 tariffs directly inflate input costs for a U.S. crop sector that is already struggling with high costs and low market returns. U.S. farmers rely heavily on modern pesticides to protect their crops from diseases, weeds, and insects, ensuring strong yields and a reliable supply of food, fiber, and fuel. The manufacturing of these crop protection products relies on highly complex, global supply chains, with final formulated products often containing dozens of active and inert chemical ingredients. Although some specific pesticide ingredients have received tariff exemptions, many crucial active and inert ingredients remain subject to Section 301 tariffs, making it significantly more expensive for companies to manufacture and deliver vital products to American farmers. When grain prices rise, so do the costs to produce pork and pork products. Ultimately, these increased costs threaten farmer incomes, crop quality, and the economic health of rural communities.

Furthermore, the agriculture industry emphasizes that using Section 301 tariffs as permanent trade architecture creates immense uncertainty, which stifles long-term business planning and investment. Section 301 was designed to enforce U.S. rights under trade agreements and encourage negotiations, not to serve as a permanent tax on imports. Because domestic chemical manufacturing and the construction of new facilities are virtually impossible without relying on imported materials, attempting to force manufacturing back to the United States via broad tariffs may be a counterproductive strategy.

Instead of relying on tariffs that burden U.S. commerce, NPPC urges the U.S. Trade Representative to carefully target trade remedies only at specific products where foreign government intervention has created excess capacity that is entirely immune to market correction. We respectfully ask that USTR exclude agricultural input equipment and inputs from any potential tariffs lists to avoid inflating domestic production costs. We also ask that retaliation risk be considered in the economic burden analysis required under Section 301. If the U.S. government's overarching goal is to strengthen domestic agricultural supply chains and manufacturing, it should replace punitive tariffs with positive investment strategies. These strategies should include tax credits, low-to-no-interest loans for capital investment,



The Global Voice for  
the U.S. Pork Industry

grant programs for workforce training to bring innovative, domestically manufactured products to the U.S. market.

NPPC appreciates the opportunity to provide comments on the potential impacts of 301 tariffs being imposed on the U.S. pork industry. Should you have further questions about the views expressed in these comments regarding potential ramifications to U.S. pork producers, please don't hesitate to contact NPPC.

Thank you for your consideration.

A handwritten signature in blue ink, appearing to read 'M. Zieba', with a long, sweeping flourish extending to the right.

Maria C. Zieba  
Vice President of Government Affairs