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

2026 Modernization of the African Growth and Opportunity Act

Docket No. USTR-2026-0166

The National Pork Producers Council (NPPC) submits these comments in response to a Federal Register Notice (Document No. USTR-2026-0016) requesting comments on the eligibility of sub-Saharan African nations to receive Africa Growth and Opportunity Act (AGOA) benefits.

NPPC is a national association representing the federal public policy and global interests of more than 60,000 U.S. pork producers. The U.S. pork industry is a major value-added sector in the agricultural economy and a significant contributor to the overall U.S. economy. More than 500,000 American jobs are supported by U.S. pork production with U.S. pork exports accounting for more than 70,000 of these jobs.

The United States is among the top global exporters of pork, shipping over 3 million metric tons (MT), valued at \$8.4 billion, to more than 100 countries annually. Gaining and expanding access to markets around the world is paramount to the growth of the U.S. pork industry. NPPC supports the objectives of AGOA to expand U.S. trade and investment with sub-Saharan Africa (SSA), stimulate economic growth, encourage economic integration, and facilitate sub-Saharan Africa's integration into the global economy. NPPC also supports AGOA's trade preferences that allow eligible countries to enter the U.S. market duty-free, as long as those countries provide reasonable and equitable market access to U.S. exports.

The World Bank reports that SSA has experienced significant population growth since the 1960s, exploding from 227 million in 1960 to 1.34 billion in 2020, which is a nearly five-fold increase over sixty years. By 2050, the SSA population is estimated to reach 2.2 billion with one in four people globally being from SSA. While the region faces significant challenges, the opportunity for economic growth—especially among a growing middle class—is unprecedented and represents a unique and largely untapped export market for U.S. agricultural exports and pork, in particular.

However, when there are clear and persistent market access barriers for U.S. exports across AGOA-eligible markets, the benefits of AGOA should be withheld until such barriers are remedied. West Africa, particularly Cote d'Ivoire, represents a market growth opportunity for U.S. pork exports, but market access remains a barrier. Angola and Kenya also represent potential market opportunities, but access to Angola is stymied by lack of transparency and consistency in issuing import permits and market access is largely denied in Kenya.

The U.S. pork industry has struggled to gain reasonable and equitable market access for many years throughout the region, but South Africa and Nigeria have been especially difficult, despite AGOA

benefits. Accordingly, we believe these two countries should demonstrate progress to remove those barriers to U.S. pork exports before receiving further benefits under AGOA.

South Africa is currently the largest non-oil beneficiary of AGOA, exporting over [\\$16.5 billion of goods under the program to the United States in 2025](#). South Africa also takes advantage of the U.S. Generalized System of Preferences (GSP) program, which gives duty-free treatment to certain goods entering the United States. Although South Africa is the largest beneficiary of the AGOA program, it remains unwilling to extend reasonable and equitable treatment to imports of United States pork and has continued to refute that it maintains non-scientific barriers that are inconsistent with its World Trade Organization (WTO) commitments.

Despite being the second largest AGOA beneficiary, exporting [\\$5.0 billion in 2025](#), Nigeria has continued to block U.S. market access for pork. Nigeria has a rapidly growing population of 237 million people, with an associated increase in protein-consumption trends. It could also serve as a useful trade hub for U.S. exports to neighboring African countries. We believe the market potential for U.S. pork in Nigeria to be valued at approximately \$26 million.

The Cote d'Ivoire significantly increased its goods exports to the United States in 2025, growing them by 89.3 percent (\$906.4 million). Despite this extraordinary growth, the Cote d'Ivoire continues to maintain trade barrier that limit the import of U.S. pork.

While Angola's exports to the United States decreased by about 53% (\$998.1 million) to [\\$871.1 million](#) in 2025, the country nevertheless remains a top recipient of the benefits of AGOA.

Kenya exported [\\$858.9 million](#) to the United States in 2025, with exports of Kenyan nuts leading its agricultural growth. Nevertheless, Kenya continues to maintain market barriers for U.S. pork.

South Africa

During the renewal of the AGOA in 2016, South Africa agreed to partially lift its ban on U.S. pork. However, since then, South Africa has continued to impose multiple restrictions on the importation of pork, so very little has been exported. Conversations with South Africa must include negotiations on full market access without restrictions and address non-science-based market access barriers.

Pork is an important source of protein in South Africa, with total imports totaling about 50,000 tons averaging \$51 million in 2025 (SAPPO), primarily from Brazil, the European Union, and the United Kingdom. Net imports averaged about 6.5% percent of South Africa's consumption – the rest is produced domestically. However, virtually none of this came from the United States, which exported a mere \$306,000 in 2025, and \$662,000 in 2024, even though the United States accounts for over 30 percent of the global pork trade. South Africa could be a significant and growing market for U.S. pork producers, as well as a gateway to other African markets, but unfortunately, our exports are hampered by unwarranted, non-scientific restrictions that are preventing the United States from realizing reasonable and equitable access to the South African pork market. These restrictions, which are inconsistent with international standards, include:

- No market access for pork offals, heat-treated/canned products, and casings;

- The unjustified restriction that lymph nodes must be removed from shoulder cuts and a lack of guidance regarding this requirement;
- Stringent, non-science-based, trichinae-related freezing requirements on U.S. pork. The United States does not require trichinae testing for U.S. pork because trichinae is not an issue in U.S. commercial pork production; and
- Limits on pork cuts allowed for importation due to concerns related to Porcine Reproductive and Respiratory Syndrome (PRRS) and the pseudorabies virus (PRV). This restriction is inconsistent with U.S. and international standards.

South Africa also has an obligation under the World Trade Organization (WTO) Agreement on Sanitary and Phytosanitary Measures (SPS Agreement) to ensure that its SPS measures are only applied to the extent necessary to protect life or health (cf. SPS Agreement Article 2.2 and Article 5.1). Despite repeated engagement from the U.S. government and industry, South Africa has yet to remove these trade barriers and has not limited control, inspection, and approval requirements to what is reasonable, necessary, and appropriate (cf. SPS Agreement Annex C).

The continued presence of these restrictions suggests that South Africa is not meeting its Sec. 104 obligations to make continual progress on the elimination of barriers to U.S. trade and investment. Because of these persistent, unjustified barriers, the United States is losing tens of millions of dollars in exports and associated U.S. jobs, while South Africa reaps favorable AGOA benefits. The ban on variety meats (internal organs) is particularly harmful. Gaining unrestricted access to this market allows U.S. pork producers to increase the value of each hog sold while providing international consumers seeking these products with an affordable, safe option. In 2015, U.S. beef gained greater access to the South African variety meat market and expanded exports to \$11.6 million in five years and stood at \$13.1 million in 2023. NPPC hopes to gain similar benefits for pork exports if it is provided equitable treatment. Expanding access to variety meat markets also reduces rendering and landfill disposal, which supports the industry's sustainability efforts.

South Africa has refused to address claims that it unjustifiably restricts pork imports due to PRRS by mandating that raw pork from PRRS-positive countries, including the United States, must undergo extensive risk-mitigation processing, including removing lymph nodes. The USTR has repeatedly argued at the WTO Sanitary and Phytosanitary (SPS) Committee that there is no documented case of PRRS transmission through commercially traded frozen pork, based on World Organization for Animal Health's (WOAH) Terrestrial Code (Chapter 15.3), and that South Africa should adopt science and risk-based requirements in line with its WTO commitments. Instead, South Africa has continued to assert that lymph nodes were removed improperly during inspection of a trial shipment in 2017, and that it maintains market access by allowing the product to undergo heat treatment to inactivate the PRRS virus at an approved establishment before entering South Africa. The United States should seek amendment of the [Meat Safety Act \(Act 40 of 2000\)](#) requiring the removal of the PRRS requirements prior to an extension of AGOA benefits.

South Africa has significant demand for variety meats but many variety meats and casings, even those that are heat-treated or canned remain entirely banned due to concern over PRRS and PRV. WOAH's Terrestrial Code (Chapter 8.2) states that PRV is highly susceptible to heat and that heating to an internal temperature core of 70°C for 30 minutes is sufficient to inactivate the virus. South Africa has failed to provide a transparent risk-based justification violating its obligations under Article 5.1 of the

WTO SPS Agreement. The United States should seek amendment of the [Meat Safety Act \(Act 40 of 2000\)](#) acknowledging the safety of heat-treated variety meats and casings.

South Africa also continues to maintain stringent freezing requirements related to Trichinae as part of the 2021 “Guidelines for the Sampling, Transportation, and Handling of Samples for the Microbiological Monitoring of Meat” that fall under the legislative mandate of the Meat Safety Act, 2000 (Act No 40 of 2000), despite *Trichinella spiralis* not being present in U.S. commercial pork production. USDA has provided evidence to South Africa that Trichinella has not been detected in the U.S. commercial swine herd in well over a decade, and that tests conducted by the USDA under the Agricultural Marketing Service Trichinae Export Program, demonstrated the prevalence of Trichinella in the U.S. is 0.194 per 1 million animals. These requirements should be lifted prior to the extension of any AGOA benefits for South Africa.

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 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 GATT Article XI.1, and must be eliminated. NPPC is working to gain market access without any mitigations and encourages the application of science- and risk-based policies and practices. Nigeria should eliminate its ban on raw pork and AGOA benefits should be withheld until such time as the pork ban is lifted by Nigeria.

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. Exporters must pay for rigorous laboratory testing in the country of origin to prove the absence of pathogens like African Swine Fever (ASF) and Classical Swine Fever (CSF), despite certification. Imports are subject to physical inspections by the *Direction des Services Vétérinaires* (DSV) upon arrival. If a shipment is flagged, the importer bears the storage costs at the port, which can quickly exceed the profit margin of the meat itself. Imports also require a preliminary import authorization, Autorisation Préalable d’Importation (API). The API is issued by the Ministry of Animal and Fishery Resources and can often encounter signature delays that result in export delays and the meat never receiving approval to depart the exporting country.

Angola

Potential for U.S. pork exports to Angola exists. Unfortunately, similar to Cote d’Ivoire, U.S. exports are 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. Pork is included on a list of products that require a non-automatic import license. This means the government can deny licenses based on the current supply situation. To obtain an import license, importers must often prove they

have first attempted to source pork from local Angolan producers. This "local content" requirement acts as a major deterrent for high-volume US exporters. The United States should require Angola to eliminate its protectionist import licensing regime for pork.

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. Starting in 2026, U.S. pork must now undergo mandatory physical inspection upon arrival by the Kenya Bureau of Standards (KEBS). This inspection carries a fee of 0.6% of the customs value and significantly increases the risk of delays, demurrage charges, and potential rejection while the meat sits at the Port of Mombasa. Kenya, similar to South Africa, does not recognize the U.S. system of food control for *Trichinella spiralis*. *Kenya should eliminate its freezing requirements for U.S. pork.* Kenya also strictly prohibits the use of ractopamine, despite international standards organizations such as the Codex Alimentarius having established safe limits for use. Kenya should adopt Codex limits for ractopamine consistent with international standards set by Codex. Finally, importers must obtain an import permit from the Director of Veterinary Services (DVS) which can be withheld based on local supply. Kenya should also eliminate its protectionist import licensing requirements.

Conclusion

The modernization of AGOA provides an important opportunity to establish standards that bolster market access for U.S. pork producers and build a framework for future trade that is mutually beneficial. It is imperative to incentivize AGOA beneficiaries to ensure that SPS measures are science- and risk-based and do not operate as disguised restrictions on bilateral trade. Without this stimulus, African markets may continue adopting regulatory structures that neglect international, science-based standards. Continuing with the status quo allows AGOA countries to relegate U.S. pork producers to residual market share despite the fact that they are the largest producers in the world of safe, high-quality pork.

NPPC strongly encourages USTR to prioritize the adoption of SPS measures that are science- and risk-based and align with commitments secured in several of the agreement on reciprocal trade (ART) negotiations. We note with dismay, that no ARTS have been announced with African countries. The ART commitments negotiated so far ensure that countries adopt science- and risk-based measures, recognize the U.S. food safety control system, adopt international Codex residue standards, and eliminate non-tariff barriers such as licensing and facility registration schemes that limit trade. Such features are all elements AGOA reauthorization should include.

NPPC remains an active supporter of expanded trade. However, NPPC does not support AGOA countries reaping the rewards of preferential U.S. tariff programs while providing significantly limited market access for U.S. pork. We encourage USTR and Congress to work together to ensure that AGOA renewal includes tangible gains for U.S. agriculture, including the pork producers. NPCC stands



The Global Voice for
the U.S. Pork Industry

ready to provide the necessary expertise and guidance to foster new, strong trade partnerships with AGOA eligible nations eager to collaborate with U.S. pork

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