National Pork Producers Council®

The Global Voice for
the U.S. Pork Industry

July 10, 2026

RE: USTR–2026–0430; Request for Comments on the Scope and Operation of a Mechanism to Promote Reciprocal Managed Trade with China

Dear Ambassador Greer and Ambassador Callahan:

The National Pork Producers Council (NPPC) appreciates the opportunity to comment on the evolving U.S. trading relationship with China. Our comments focus on the two key areas of interest identified in the Federal Register notice:

1. *The types of non-sensitive products that would benefit from favorable tariff modifications, and*
2. *Considerations around the design of a new government-to-government mechanism—a U.S.-China Board of Trade—to manage bilateral trade optimization on an ongoing basis.*

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 70,000 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 3 million metric tons of pork and pork products valued at over $8.6 billion.

<u>Tariffs</u>

The People's Republic of China has long been a critical market for U.S. pork, as China has consistently been a top five market for U.S. pork and pork variety meat exports. In 2025, U.S. pork and variety meat exports to China totaled 367,416 metric tons (mt), down 21%, from 467,227 mt in 2024. The value of U.S. pork and pork variety meat exports reached $857.46 million, down 23% from $1.11. billion in 2024.

China is by far the largest importer of pork variety meats in the world accounting for 67% of global imports last year. For the United States, China accounted for 59% of pork variety meat exports with Mexico as the other dominant buyer. Exports of feet, heads, stomachs, hearts, etc. add value to every pig produced in the U.S. There is no alternative market to take the volume and value of U.S. pork variety meat as demanded by China.

Since 2018, U.S. pork and pork products have faced persistent uncertainty and retaliatory tariffs from China. These measures have been linked to various trade disputes, including Section 232 metal tariffs, Section 301 IP-related tariffs, and the 2025 fentanyl and reciprocal tariffs. Entering 2025, duties on most U.S. pork and variety meats stood at 37%, factoring in a 25% retaliatory duty from the 2018 metal tariffs. While these rates spiked to 172% in April 2025, they were reduced to 47%—which includes a 10% "reciprocal" rate—following a truce in November.

A key component of the November 2025 agreement was a stay on Section 301 tariffs until the end of 2026. Without this delay, U.S. pork would have faced an additional 30% duty. However, because these waivers are set to expire at the close of 2026, U.S. pork producers continue to face significant trade uncertainty.

To provide long-term certainty, China's retaliatory duties on U.S. pork should be eliminated. Furthermore, Section 301 waivers ought to be extended or, ideally, the threat of these elevated tariffs should be permanently removed.

The following table shows China's import data, in U.S. dollars, for the 2022-2024 average, by HS code. These products are all subject to retaliatory duties, which should be removed.

China's Imports from the U.S., Value in USD	
	2022-24 avg
Pork Total	**950,626,614**
020649 frozen other offal	751,509,456
0203 chilled/frozen pork	183,162,382
160249 prepared pork	23,649,379
021019 cured other pork	282,785
HS 0504 Stomachs, intestines	**405,297,266**
05040029	340,862,011
05040011	51,090,297
05040090	11,031,394

U.S.-China Board of Trade

The China Phase One agreement yielded market access gains for the U.S. pork industry, however, commercial potential for pork has continued to be restricted due to tariffs, domestic subsidies, and various sanitary and phytosanitary (SPS) restrictions that violate China's World Trade Organization (WTO) obligations.

The benefit of addressing market access concerns is detailed in the June 2026 edition of the North Dakota State University (NDSU) Trade Monitor entitled "*Assessing the 2020 U.S. China Phase One Agreement: Lessons for 2026 Ag Commitments*." NDSU Economists found that purchase commitments and tariffs drove short-term export growth Under Phase One. Tariff waivers and reduced retaliatory duties were central to this commercial impact, allowing large volumes to be shipped without the full force of Section 301 duties, as did "high commodity prices, tight Chinese feed supplies, drawn down corn stocks, and pork import demand," driven by an African Swine Fever outbreak.

For other commodities, NDSU found that longer-term gains were found to be tied to structural market access improvements, or the resolution of SPS and non-tariff barriers (NTBs), rather than just purchase commitment fulfillment. NDSU also found that the Phase One Agreement "moved substantial trade when tariff waivers, SPS treatment, approvals, and commercial demand aligned," and that the channels of trade can "narrow over time without a formal reversal" of market access restrictions.

Post-Phase One U.S. pork exports to China fell to around three-fifths of the Phase One average. This decline reflected declining Chinese imports as the Chinese hog herd recovered rather than a reversal of USDA, Food Safety and Inspection Service (FSIS) recognition. However, China failed to complete a commitment to perform a risk assessment of ractopamine, which continues to constrain market access for U.S. pork.

Since the China 2026 commitments enter a different market setting, with softer Chinese grain demand, expanded Brazilian supply of grains and pork, and a still-layered tariff structure, it is imperative that the Board of Trade should not focus solely on tariffs and "managed trade" but should also serve as a mechanism for engagement between the U.S. and China, and for assessing market access commitments. Addressing long-standing and on-going barriers for U.S. agricultural exports, but also seeking establishing a regular dialogue to pro-actively identify solutions to potentially problematic new issues that could undermine the U.S.- China agriculture trade relationship should fall under the umbrella of the Board of Trade.

SPS and NTB Trade Barriers Continue to Constrain Exports of U.S. Pork

The following are examples of China's trade restrictions that continue to violate its WTO obligations:

Domestic Subsidies

China subsidizes its livestock industry, including at the provincial and local government levels. For example, in the swine industry, state-owned banks offer large-scale swine operations discounted loans, while provincial and local governments offer preferential land deals and rail and utility consolidation.

Veterinary Drug Residues and Microbiological Standards

China requires that all U.S. pork exports test negative for residues of ractopamine hydrochloride, a commonly used feed additive utilized for growth promotion and feed efficiency in U.S. hog production. Ractopamine has established maximum residue limits (MRLs) set by the Codex Alimentarius for pork that are widely accepted globally. China justifies its zero tolerance for ractopamine residues in imported pork through a domestic regulation banning the use of ractopamine by Chinese hog and cattle producers it argues is necessary to prevent producer abuse of the compound if it was legalized.

U.S. pork products destined for China must be produced under the USDA Agriculture Marketing Service (AMS) Never Fed Beta Agonist program, which restricts the feeding of ractopamine at the producer level and requires segregation of ractopamine-free pork through the production and supply chain. Removing ractopamine from the diets of hogs in the U.S. adds significant costs to production, while also adding cost and complexity within plants and cold storages to maintain ractopamine-free programs and assure proper segregation. Since 2015, China has required all U.S. pork exports to be accompanied by a ractopamine-free certificate of analysis (COA), despite ractopamine-free programs being in place and administered by the United States Department of Agriculture (USDA).

China has failed to complete the risk assessment and therefore has not yet made any progress on next steps based on the risk assessment, which will need to include the establishment of a MRL or import tolerance.

China also maintains non-scientific microbiological standards, including a zero tolerance for the presence of Salmonella spp. on the surface of whole muscle cuts of pork. These microbiological standards, in addition to non-science based veterinary drug residue requirements, are applied in a non-transparent manner and with very little consistency across ports-of-entry and with minimal information on testing rates and methodologies. This often results in excessive product clearance times and in the past has been the basis for the delisting of U.S. red meat plants exporting to China.

Plant Registration

On January 1, 2022, China implemented The Regulations on the Registration and Administration of Overseas Producers of Imported Food and Administrative Measures on Import and Export Food Safety (Decree 248 and 249). The regulations require overseas food manufacturers and storage facilities to register with Chinese authorities and to label a new 18-digit registration code specific to each establishment generated by an online portal on the inner and outer packaging of foods manufactured and exported to China after January 1, 2022. The Phase One Agreement has specific plant registration language superseding these requirements, which has allowed pork to be exempt from the decree requirements. The requirements, however, have created significant confusion in the commercial market as importers are continually requesting that plants log in to the portal and register, and exporters include their registration code on box labels.

In February 2025, China allowed export registrations to expire for two major pork facilities, and more than 100 facilities were at risk of expiring in April. The General Administration of Customs of China (GACC) was slow to respond to requests to renew the facilities registrations, although all were eventually completed by mid-June 2025 and remain valid for five years. While the plant registrations were ultimately renewed, the gap in registration approval and the unpredictable renewal process creates significant uncertainty for exporters.

Animal Disease Testing

Since 2022, China has rejected shipments from certain U.S. pork facilities and subjected subsequent shipments from these facilities to increased inspections due to alleged detections of animal diseases, such as porcine reproductive respiratory syndrome (PRRS). The United States utilizes vaccines to control the spread of PRRS and certain common testing techniques are known to show false positives when the animals being tested have received vaccinations. PRRS is endemic in China and poses no threat to human health. Furthermore, World Organization on Animal Health has determined that there is no evidence that PRRS is transmitted through the legal trade of meat products. China has not identified any standard or regulation that the shipments in question violated, nor has China identified a pathway for shipments from implicated facilities to resume normal customs clearance procedures. In at least one instance, China was demanding that a facility with a PRRS finding submit to an audit prior to any reinstatement. The United States has continued to resist the need for an audit in such circumstances.

An Agriculture Specific Mechanism would benefit all U.S. Agricultural Trade

Establishment of an agriculture specific mechanism of subcommittee as part of the Board of Trade would enable regular dialogue on market access issues, both SPS and NTBs, which China uses to limit its imports. This mechanism could function similar to technical committees like those routinely set forth in free trade agreements and utilized by the USMCA. In addition to looking at trade management, the Committee could pull together technical experts to ensure that progress is being made on SPS and NTB commitments, and where progress has occurred like a risk assessment for ractopamine, technical experts could gather to discuss results and next steps. This would lead to longer-term access gains for U.S. pork and variety meats. A regular cadence for the meeting of the agriculture group to discuss on-going barriers to U.S. exports and pro-actively address potential areas of regulatory alignment should be established. Semi-annual reviews could be undertaken to assess trade flows and purchase commitments. The U.S. publishes weekly and monthly export data, and China's monthly import data is timely which could be used for these purposes. A new list of commodity-specific SPS and NTB commitments should be developed and pursued to facilitate continued certainty for U.S. exporters. Review of these commitments should be undertaken regularly, at a minimum on an annual basis.

Again, NPPC expresses its appreciation for the opportunity to comment on China's compliance with WTO commitments as it relates to their importation of pork and pork products and is looking forward to continuing to work with USTR.

Thank you for your consideration.

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