

September 17, 2026

Mark DiPlacido
Chair, Trade Policy Staff Committee
Office of the United States Trade Representative
600 17th St NW
Washington, DC 20508

RE: USTR–2026–0496; 2026 China WTO Compliance Report

Dear Mr. Diplacido,

The National Pork Producers Council (NPPC) submits these comments in response to a Federal Register Notice (Document No. USTR-2026-0496) requesting comments on China's compliance with World Trade Organization (WTO) commitments as it relates to their importation of pork and pork products.

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. Last year, the U.S. pork industry exported 3 million metric tons of pork and pork products valued at over \$8.4 billion.

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.

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 WTO obligations.

The following are examples of China's trade-restricting measures which are not aligned with WTO rules and international standards.

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, as well as other non-market support and incentives to expand pork production.

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. Despite China commitments made more than six years ago, they have not completed a sound science-based risk assessment for ractopamine.

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).

As part of the Phase One Agreement, China agreed to broaden the list of pork products that are eligible for importation, including processed products such as ham and certain types of offal that are inspected by the USDA's Food Safety and Inspection Service (FSIS) for both

domestic and international trade. China also agreed to conduct a risk assessment for ractopamine in swine as soon as possible and to establish a joint working group with the United States to discuss next steps based on the risk assessment, however, the ban remains in place. 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 and cost 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, the World Organization on Animal Health (WOAH) 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. An audit should not be required to confirm conformity with international standards or necessary to address China's concern. Technical talks should be sufficient to address the issue.

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 to resolve these market access issues.

Thank you for your consideration.



Maria C. Zieba
Vice President of Government Affairs