

October 30, 2025

ELECTRONIC SUBMISSION TO <https://comments.ustr.gov/s/>

Mr. Daniel Watson
Assistant U.S. Trade Representative for the Western Hemisphere
Office of the United States Trade Representative
600 17th Street NW
Washington, DC 20508

**Re: U.S. Food and Agriculture Industry Associations
Public Comment on the Operation of the Agreement Between the United States of
America, the United Mexican States, and Canada (USTR-2025-0004)**

Dear Mr. Watson:

The undersigned organizations representing the American food and agricultural value chain submit this letter of support for a full 16-year renewal of the Agreement Between the United States of America, the United Mexican States, and Canada (USMCA). Our organizations represent U.S. farmers, producers, distillers, ranchers, seafood harvesters, agribusinesses, grain handlers and exporters, agricultural co-operatives, retailers, and state departments of agriculture who have benefited tremendously from the seamless North American integration between the United States, Canada, and Mexico afforded by the provisions in USMCA.

The United States is the world's largest agricultural exporter, and a majority of signers consider Canada and Mexico among their top five export markets. Trade integration between all three countries, enhanced by former trade agreements and accelerated by the USMCA, allowed agricultural exports from the United States to soar. This led to the tripling of the value of agrifood trade with the three countries between 2005 and 2023, totaling \$285 billion. Nearly three-fourths of all U.S. agricultural exports to Mexico are comprised of grains, pulses, seeds and oilseeds, meat and related products¹. The United States enjoys a trade surplus in all those categories with Mexico, which is a testament to the success of the agreement for U.S. farmers. Canada is the largest or second-largest market for a large variety of U.S. agricultural products, such as grain and feed, dairy products, seeds, fruits and vegetables, meat and meat products, seafood and fish products, processed foods, distilled spirits, and biofuels. For both Canada and Mexico, the United States is each country's largest trading partner.

Trade cooperation between the United States, Mexico, and Canada affords multifold benefits, underscoring the need to uphold and maintain the agreement text of USMCA as written without major adjustment. Building on prior trade facilitation efforts, USMCA's provisions facilitated and streamlined the flow of commerce throughout all three countries. This has directly

¹ <https://www.ers.usda.gov/topics/international-markets-us-trade/countries-regions/usmca-canada-mexico/mexico-trade-fdi>

contributed to efficiencies in the agricultural sector, at a cost savings to American farmers, producers, and ranchers. Specifically, the agreement's sanitary and phytosanitary (SPS) provisions increased regulatory transparency and ensured science-based treatment of agricultural commodities and products to the benefit of animal and plant health, which have worked incredibly well for U.S. exporters. The SPS and agricultural biotechnology provisions are facilitating more efficient approvals and science-based regulation, which allows farmers to access the latest innovations leading to financial savings and improved soil health. Additionally, the technical barriers to trade (TBT) provisions are instrumental in removing obstacles inhibiting trade and strengthening regulatory cooperation. The intellectual property (IP) provisions are critical to protecting U.S. innovations in seed and chemistry that farmers depend on, and the provisions on geographical indications (GIs) are critical to preventing trade barriers to a range of U.S. agricultural exports. Furthermore, the Chapter 31 dispute settlement provisions provide a mechanism for resolving barriers that otherwise disrupt U.S. agriculture's export market stability and growth.

Many U.S. agricultural commodities benefited from new or expanded market access in both Canada and Mexico, amplified by the preservation of the zero-tariff provisions retained in USMCA. Any adjustment should be carefully considered in order to avoid negative impacts on agriculture, especially any measure that weakens the agreement and thereby lessens the strength and value of U.S. agricultural exports, at a time when U.S. farmers and ranchers are at risk of losing other export markets. Therefore, it is critical not to backslide on the current provisions of USMCA and ensure that trade certainty is maintained and strengthened.

Integrated food and agriculture supply chains in North America have improved regional food security, particularly in rural areas, and further strengthen global competitiveness for food, energy, and industrial products that utilize agricultural inputs. Global competitiveness and resilience are especially important as our industries respond to challenges from non-market economies. The strength of the trilateral partnership welded in USMCA allows North America to forcefully compete against other trading powers that do not adhere to the same global standards, for example in the areas of SPS or agricultural biotechnology, or that maintain non-market economies devoid of a true private sector. As the United States grapples with confronting new and emerging threats from bad actors, U.S. food and agriculture supply chains are equally vulnerable to economically coercive tactics employed in a retaliatory nature, threatening to upend global demand that farmers depend on to make a living. Therefore, maintaining a rules-based agreement with binding commitments protects the U.S. food and agriculture industry.

Without the economic might that this trilateral agreement affords, farmer incomes would be harmed, as the industry would be saddled with additional and burdensome costs related to transportation and compliance measures. Within this period of economic stress on the nation's food and agriculture systems, U.S. agricultural exporters and family farms depend on the stability of USMCA to factor into their multi-year planning. Without the certainty guaranteed under by USMCA, agribusinesses and family farms would face undependable markets and weakened global competitiveness.

Our organizations are deeply reliant on trade, and our closest neighbors are the strongest trading partners for U.S. agriculture and its continued success. We stand ready to provide the

expertise needed to maintain U.S. leadership within USMCA and advocate for the continued trade certainty that it provides.

Sincerely,

Agribusiness Council of Indiana

Agricultural Retailers Association

Alabama Soybean & Corn Association

American Bakers Association

American Farm Bureau Federation

American Feed Industry Association

American Seed Trade Association

American Soybean Association

Ameriflax

Arkansas Corn and Grain Sorghum Board

California Prune Board

Colorado Corn Growers Association

Colorado Pork Producers Council

Corn Growers Association of North Carolina

Corn Refiners Association

CropLife America

Distilled Spirits Council of the U.S.

Edge Dairy Farmer Cooperative

Farmers for Free Trade

Flavor and Extract Manufacturers Association of the United States

Fresh Produce Association of the Americas

Georgia Corn Growers Association

Georgia/Florida Soybean Association

Global Cold Chain Alliance

Growth Energy

Idaho Barley Commission

Idaho Grain Producers Association
Illinois Corn Growers Association
Illinois Soybean Growers
Illinois Fertilizer and Chemical Association
Illinois Pork Producers Association
Independent Bakers Association
Indiana Corn Growers Association
Indiana Soybean Alliance Membership & Policy Committee
International Dairy Foods Association
Iowa Biodiesel Board
Iowa Corn Growers Association
Iowa Soybean Association
Juice Products Association
Kansas Agribusiness Retailers Association
Kansas Corn Growers Association
Kansas Grain and Feed Association
Kansas Pork Association
Kentucky Corn Growers Association
Kansas Soybean Association
Kentucky Soybean Association
Louisiana Cotton & Grain Association
Maryland Grain Producers Association
Michigan Corn Growers Association
Michigan Soybean Association
Mid-Atlantic Soybean Association
Minnesota Corn Growers Association
Minnesota Soybean Growers Association
Mississippi Corn Growers Association
Mississippi Soybean Association
Missouri Corn Growers Association

Missouri Pork Association
Missouri Soybean Association
Montana Pork Producers Council
National Association of State Departments of Agriculture
National Association of Wheat Growers
National Barley Growers Association
National Corn Growers Association
National Cotton Council
National Council of Farmer Cooperatives
National Fisheries Institute
National Grain and Feed Association
National Milk Producers Federation
National Oilseed Processors Association
National Pasta Association
National Pork Producers Council
National Sorghum Producers
National Sunflower Association
Nebraska Corn Growers Association
Nebraska Pork Producers Association
Nebraska Soybean Association
New York Corn and Soybean Growers Association
North American Blueberry Council
North American Coalition for Insect Agriculture
North American Millers' Association
Northern Canola Growers Association
North Carolina Agribusiness Council
North Carolina Soybean Producers Association
North Dakota Corn Growers Association
North Dakota Soybean Growers
Northwest Horticultural Council

Ohio AgriBusiness Association
Ohio Corn & Wheat Growers Association
Ohio Pork Council
Ohio Soybean Association
Oklahoma Pork Council
Pacific Northwest Canola Association
Pennsylvania Corn Growers Association
SNAC International
South Carolina Corn and Soybean Association
South Dakota Agri-Business Association
South Dakota Corn Growers Association
South Dakota Pork Producers Council
South Dakota Soybean Association
Southern Crop Production Association
Sweetener Users Association
Tennessee Corn Growers Association
Texas Corn Producers Association
Texas Pork Producers Association
Texas Soybean Association
The Association for Dressings & Sauces
U.S. Apple Association
U.S. Canola Association
U.S. Dairy Export Council
U.S. Grains & BioProducts Council
U.S. Wheat Associates
US Rice Producers Association
USA Pulses
USA Pulses Trade Association
USA Rice
Virginia Agribusiness Council

Virginia Grain Producers Association

Virginia Soybean Association

Washington Association of Wheat Growers

Wisconsin Corn Growers Association

Wisconsin Pork Association, Cooperative

Wisconsin Soybean Association

Wyoming Ag Business Association

Wyoming Wheat Marketing Commission