



November 3, 2025

Office of the U.S. Trade Representative  
Jamieson Greer  
U.S. Trade Representative  
600 17th St NW  
Washington, DC 20508

***Docket Number USTR-2025-0004: Request for Public Comments on the Operation of the Agreement Between the United States of America, the United Mexican States, and Canada***

Dear Ambassador Greer,

The Meat Institute appreciates the opportunity to submit comments to the Office of the U.S. Trade Representative (USTR) in response to Docket Number USTR-2025-0004: “Request for Public Comments on the Operation of the Agreement Between the United States of America, the United Mexican States, and Canada.”

The Meat Institute is the United States’ oldest and largest trade association representing packers and processors of beef, pork, lamb, veal, turkey, and processed meat products, and Meat Institute member companies account for more than 95% of U.S. output of these products. The Meat Institute provides legislative, regulatory, international affairs, public relations, technical, scientific, and educational services to the meat and poultry packing and processing industry.

The U.S. meat and poultry industry is the economic engine powering the agriculture sector. According to the U.S. Census Bureau, meat and poultry processing is a \$227.9 billion industry. Meat and poultry packers and processors employ more than 532,000 workers paying average hourly wages of \$22. The meat and poultry industry produces on average 27.95 billion pounds of beef, 27.67 billion pounds of pork, 53.2 million pounds of veal, 138.4 million pounds of lamb and mutton, and 50.4 billion pounds of poultry.<sup>1</sup> Based on USDA Economic Research Service trade multipliers, U.S. meat and poultry exports contribute additional export activity of more than \$44 billion,<sup>2</sup> supporting American workers, farm communities, producers, and companies along the meat and poultry supply chain.

The domestic U.S. meat and poultry industry’s long-term economic viability, though, depends on robust international trade, particularly as domestic per capita consumption of meat and poultry remains stable, and 95 percent of consumers live outside the United States. International trade is, therefore, vital to the long-term strength of the U.S. meat and poultry industry, the American workers it supports, and the rural and farm communities it sustains. In 2024, U.S. meat and poultry exports exceeded \$24.6 billion; meat and poultry product exports to Canada and Mexico accounted for \$7.5 billion of that total.<sup>3</sup> Annually, approximately 14% of U.S. beef production, 15% of U.S. poultry production, and 25% of U.S. pork production are exported. According to a 2022

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<sup>1</sup> “Industry at a Glance,” Meat Institute, accessed September 26, 2025, [https://www.meatinstitute.org/Industry\\_at\\_a\\_Glance](https://www.meatinstitute.org/Industry_at_a_Glance)

<sup>2</sup> “Agricultural Trade Multipliers,” USDA Economic Research Service, USDA, updated July 2, 2025, <https://www.ers.usda.gov/data-products/agricultural-trade-multipliers>

<sup>3</sup> “GATS Home,” USDA Foreign Agricultural Service, USDA, accessed October 15, 2025, <https://apps.fas.usda.gov/gats/default.aspx>

report published by the Economic Research Service, U.S. agricultural exports support 86,127 jobs in the beef industry, 52,999 jobs in the pork industry, and 45,855 jobs in the poultry industry.<sup>4</sup>

Exports add value to every animal produced and in turn increase demand for U.S. corn and soybeans. For example, on average, pork exports contribute \$64 in value to each hog that is marketed in the U.S. and U.S. beef exports yield more than \$400 in value per head of cattle. Consequently, the resilience of the U.S. meat and poultry industry is inextricably linked to U.S. trade policy and attendant initiatives that foster U.S. meat and poultry export growth.

The Trump Administration's America First Trade Policy Agenda has reinvigorated American trade policy and has reasserted American leadership to advance U.S. meat, poultry, food, and agriculture trade in a manner that revitalizes our farm communities and supports broad-based economic growth. President Trump's negotiation of the U.S.-Mexico-Canada Agreement (USMCA) during his first term resulted in the world's gold-standard trade agreement. Thanks to President Trump's leadership, USMCA has bolstered U.S. meat, poultry, and livestock trade, has led to increased market integration in North America, and must be preserved without significant changes that would disrupt the U.S. meat and poultry industry's substantial access to the Canadian and Mexican markets.

The North American meat and poultry industry is among the most integrated supply chains globally, with regional cross-border trade in livestock and meat and poultry products exceeding \$16 billion annually.<sup>5</sup> This integration supports American businesses, rural and agricultural communities, and American workers, boosts U.S. economic growth, stabilizes food prices, and strengthens American supply chains against shocks from less predictable, more adversarial trading partners. American farmers, ranchers, food and agricultural producers, and meat and poultry companies have built resilient supply chains to serve reliable consumers and customers across North America. Without USMCA's ambitious elimination of tariff and non-tariff barriers, American food and agricultural producers would be subject to less favorable terms that could displace our high-value, high-quality products in the face of fierce competition from the European Union (EU), Brazil, and China. USMCA ensures the U.S. upholds, rather than abdicates, its unrivaled leadership role within North America.

The Meat Institute supports the USMCA's continuation for another 16-year term, per the agreement's review procedures. Existing and emerging trade irritants and barriers can be resolved using consultative mechanisms in the agreement or through other available bilateral and trilateral means. Avoiding a disruptive renegotiation is vital to preserving the predictability USMCA affords to American businesses and ensures its benefits will continue to reach American food and agricultural producers, farmers and ranchers, and meat and poultry companies. The ensuing comments offer clear reasons for renewing the agreement with minimal revisions.

### **USMCA Advances American Economic Prosperity**

The USMCA is the American meat and poultry industry's indispensable trade agreement, affirming preferential access to two of the U.S.'s largest export markets for meat, poultry, and livestock products, delivering stability and predictability to American farmers, ranchers, and processors, and supporting hundreds of thousands of American jobs and businesses across the rural economy that depend on robust regional trade to remain operational and sustain livelihoods.

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<sup>4</sup> Monica Cordero, "Graphic: US agricultural exports support 1.25 million jobs," Investigate Midwest, November 6, 2024, <https://investigatemidwest.org/2024/11/06/graphic-us-agricultural-exports-support-1-25-million-jobs/>

<sup>5</sup> "GATS Home," USDA Foreign Agricultural Service, USDA, accessed October 15, 2025, <https://apps.fas.usda.gov/gats/default.aspx>

In 2024, the last full year for which data is available, Canada was the U.S.'s fifth largest export market for beef (\$896 million), by value, the fourth largest value market for U.S. pork exports (\$852 million), and the second largest value market for U.S. poultry exports (\$531 million).<sup>6</sup> Importantly, Canada is the top market for U.S. processed pork products, like bacon, ham, and sausages, which boost the U.S. pork industry's revenue, while offering protection against volatile demand for these products in markets like China and Southeast Asia. USMCA also leveled the playing field for U.S. poultry products to Canada, increasing the previous 47,000 metric ton (mt) quota for U.S. chicken to 57,000 mt by year six of the agreement, which grows one percent for an additional 10 years. The U.S. is still eligible to export up to 39,844 mt under Canada's World Trade Organization (WTO) tariff rate quota regime. For U.S. turkey exports, Canada provided the U.S. and other country members of the WTO access equivalent to no less than 3.5% of the previous year's total Canadian turkey production. This allows the U.S. to export up to 1,000 mt of additional turkey products each year since the entry into force of USMCA.<sup>7</sup>

Meanwhile, Mexico was the U.S.'s fourth largest beef (\$1.3 billion) export market by value, and the top value destination for U.S. pork (\$2.5 billion) and poultry (\$1.4 billion) exports in 2024.<sup>8</sup> Significantly, Mexico is a key market for U.S. beef variety meat exports – products not commonly consumed domestically – including tripe, lips, hearts, and intestines. Furthermore, increases in U.S. pork variety meat exports, like stomach and intestines, to Mexico have offset losses to other markets, like China, in recent years, underscoring Mexico's status as a reliable trading partner, whose consumer demand for variety meats helps maximize carcass value for American beef and pork producers, particularly as U.S. consumer demand for these types products lags.

The value of the Canadian and Mexican markets for U.S. meat exports, and in turn, the American farm economy, cannot be overstated. U.S. pork exports to Canada and Mexico in 2024 added approximately \$26.51 in value per hog slaughtered. That accounts for 41.4% of the total \$64 per head U.S. pork exports yielded in 2024. Beef export value per fed head slaughtered in 2024 averaged \$89, or 21.4% of the total per head export value of \$415. These values are not only signs of the substantial economic importance of Canada and Mexico for American ranchers, farmers, and meat exporters, but they will also grow more significant as meat and poultry access to China becomes increasingly precarious.

Although the U.S. imports more livestock than we export to supplement the domestic herd, American farmers and ranchers have availed themselves of the favorable terms established in USMCA, with Canada and Mexico consistently ranking as the top markets for U.S. live animal exports. In 2024, the U.S. exported 322,831 and 21,251 head of cattle to Canada and Mexico, respectively. Furthermore, U.S. live hog exports to Mexico and Canada reached 56,176 and 13,108, respectively, in 2024, and exports of U.S. broilers to Mexico and Canada were 1,588,217 and 318,547, respectively, reflecting the value of these markets for American pork and poultry producers. Canada is the largest destination for U.S. exports of cattle, valued at \$391 million, accounting for 84% of U.S. cattle export value, followed by Mexico at \$35.6 million or 8% of total U.S. cattle export value. Similarly, Mexico is the top market for U.S. hog exports, valued at \$12 million while hog exports to Canada exceeded \$1.5 million.<sup>9</sup>

These aforementioned figures would not be possible without USMCA, not only because the agreement provides duty-free and preferential access for American beef, pork, poultry, and livestock products, but also because it has

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<sup>6</sup> Ibid.

<sup>7</sup> "Agreement between the United States of America, the United Mexican States, and Canada," Office of the United States Trade Representative, last updated July 1, 2020, <https://ustr.gov/trade-agreements/free-trade-agreements/united-states-mexico-canada-agreement/agreement-between>

<sup>8</sup> "GATS Home," USDA Foreign Agricultural Service, USDA, accessed October 15, 2025, <https://apps.fas.usda.gov/gats/default.aspx>

<sup>9</sup> Ibid.

substantially streamlined customs procedures, burdensome regulations, and other barriers that decimate businesses and stifle growth.

Moreover, American farmers, ranchers, agricultural producers, and meat and poultry companies rely on imports from Canada and Mexico to complement domestic meat and poultry production, stabilize food prices, support American manufacturing jobs, and meet consumer preferences. Specifically, Canada and Mexico are the U.S.'s top two cattle suppliers. The importance of imported livestock rises when the U.S. herd rebuilds, and American beef and pork processing plants, particularly smaller- and medium-sized establishments, need a consistent, stable supply of imported livestock to remain operational. Few other countries have the capability to fill critical supply gaps, and the ones that do, like Australia for live cattle purposes, are not always feasible options for American companies that cannot afford the transportation and logistics costs associated with imports that travel longer distances.

In 2024, Mexico supplied 1,249,202 head of cattle to the U.S. industry, whereas cattle from Canada totaled 793,291 head. The preponderance of imports from Mexico are lighter-weight cattle intended for stocker or feeder operations. More than 60% of imported cattle from Canada are destined for immediate slaughter; of Canadian cattle imported for immediate slaughter, on average, 60% are fed steers and heifers and 40% are cows. Feeder cattle imported for finishing in American feedlots consist of more than 30% of the cattle imported from Canada. Since 2014, the average number of imported live cattle from Mexico and Canada has exceeded 1.94 million head per year, of which, on average, 537,978 cattle are intended for immediate slaughter, with 14,166 cattle reserved for breeding, and the balance of 1,388,412 cattle destined for feed yards.<sup>10</sup> These cattle do not displace or undermine American-born cattle, but rather serve to expand American beef production to ensure domestic consumers have a steady supply of competitively priced, high-quality beef, American farmers and ranchers earn more to support their operations, and U.S. meat and poultry exporters are more competitive in global markets. The complimentary, revenue-generating nature of these cattle imports is evidenced by the fact that in 2023, with an average fed cattle price of \$174.71 per hundredweight that year, imports from Canada and Mexico generated more than \$3.39 billion for American cattle producers and meat and poultry companies.<sup>11</sup>

And, the economic gains for the U.S. farm economy stemming from Canadian and Mexican live cattle imports were not reserved only for the meat sector. Based on an average slaughter weight of 1,368 pounds and an average dressed weight of 825 pounds in 2023, cattle from USMCA partners each would have consumed an average of 35.91 bushels of corn and 0.66 tons of dried distillers grain with solubles (DDGS), totaling 50,956,075 bushels of U.S. corn and 923,287 tons of U.S. DDGS in American feedlots. That translates to more than \$303 million in additional U.S. corn consumption and \$202 million in additional U.S. DDGS consumption.<sup>12</sup>

Plus, in 2024, the U.S. imported 6,761,807 live hogs from Canada, mostly as feeders to be finished and sold as market hogs. Canada is also the second largest exporter of broilers to the U.S., with imports totaling 40,547 in 2024.<sup>13</sup> In the poultry sector, a significant volume of turkey genetics (day-old poults) is traded between the U.S. and Canada each year, with Canada demonstrating higher demand for female poults (hens) and the U.S. exhibiting higher demand for male poults (toms), reinforcing the market stabilization effects of this bilateral trade.

Additionally, Canada and Mexico are two of the largest suppliers of beef to the U.S., with value exceeding \$2.6 billion and \$1.7 billion, respectively, in 2024. Canada is the largest exporter of both pork (\$1.1 billion) and poultry

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<sup>10</sup> Ibid.

<sup>11</sup> Data extracted and analyzed from USDA Economic Research Service, <https://www.ers.usda.gov/>

<sup>12</sup> Ibid.

<sup>13</sup> "GATS Home," USDA Foreign Agricultural Service, USDA, accessed October 15, 2025, <https://apps.fas.usda.gov/gats/default.aspx>

(\$650 million) products, by value, to the U.S., whereas Mexico is the U.S.'s third largest supplier of both pork (\$194 million) and poultry (\$31 million) products by value.<sup>14</sup> Because U.S. beef production is cyclical, partly due to drought and related impacts on pasture availability and feed costs, the American beef industry relies on imports to maintain its abundant beef supply to satisfy increasing domestic demand while the U.S. herd rebuilds. Imported beef is generally leaner than U.S. grain-fed beef, and consists primarily of frozen, boneless, manufacturing beef that enters channels for further processing. Imported beef is commonly mixed with high-fat trimmings from U.S. grain-fed cattle production to produce ground beef, hamburgers, hot dogs, meatballs and other manufactured items for food service and retail stores. These items are highly valued by consumers, and imported products from our USMCA partners help combat food inflation, while minimizing pressure for U.S. meat and poultry packers and processors of all sizes, whose supply chains rely on a mixture of imported and domestically-sourced products to meet U.S. customer and consumer demand.

It is clear that USMCA's access terms – zero tariffs on most meat, poultry, and livestock trade – have underpinned American economic and job growth, particularly in rural and farm communities across the U.S. Trade in North American meat, poultry, and livestock products creates jobs and supports development in the American feed, transportation, processing, retail, and food service sectors, to name a few, with significant economic activity and investment for rural communities along the U.S.'s northern and southern borders. American truck drivers, rail operators, and logistics companies are all beneficiaries of the trade that has flourished under USMCA, with many of those jobs entirely dependent on continued, robust cross-border trade.

In border states, for example, Canadian and Mexican inputs are part of local and regional food systems, and this integration ensures American companies are capable of withstanding animal disease outbreaks, cyclical regional depressions in livestock availability, and natural disasters or other weather events that could severely impair domestic food and agriculture production in these areas. USMCA's favorable terms for American companies sourcing products from North America ensure American businesses and farmers stay afloat, while concurrently mitigating impacts on American food and agricultural output. American agricultural exporters, in turn, benefit from the fact that 90% of the Canadian population – more than 37 million people – lives within a two-hour drive of the U.S. border. This proximity reduces transportation costs thereby enabling lucrative returns for American meat and poultry products in a culturally and economically similar market. Meanwhile, Mexico's growing population, rising middle class, and appetite for variety meats and offal not commonly consumed domestically safeguards the resilience of American meat and poultry trade against unpredictable regulatory barriers in other markets, while maximizing returns for American producers who enjoy a nearby destination for products that might otherwise be discarded or rendered for cents on the dollar.

### **USMCA Reinforces American National Security**

Additionally, renewing USMCA is a national security imperative. For one, the integrated supply chains across the U.S., Mexico, and Canada reduce dependence on adversarial countries like China for critical goods, including food and agricultural inputs, while also providing stable markets for American products when countries renege on their trade commitments and obligations. For instance, China's failure to renew U.S. beef export establishment eligibility in the country's CIFER system, the online database that lists all eligible export facilities from countries that trade with China, represents an escalatory action that directly violates the U.S.-China Phase One Agreement and has effectively closed the market to U.S. beef exports. This, combined with China's pernicious suspension of American meat establishments over unjustified ractopamine and melengestrol acetate concerns, only reinforces the need to preserve and renew USMCA, not only because the agreement includes mechanisms to address and enforce behavior inconsistent with its provisions, but also because North America, led by the U.S., serves as a key economic and strategic counterweight to China's influence. By securing trade within North America, USMCA has

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<sup>14</sup> Ibid.

made the U.S. less vulnerable to geopolitical disruptions that could threaten our own economic and security interests, including our food supply. In short, trade with Canada and Mexico is not contradictory or antagonistic to American food and agricultural production and security, it is essential to sustain its strength.

The unparalleled, rules-based trading network that USMCA has established, which will be discussed at length in the next section of these comments, is necessary to constrain the influence of authoritarian countries, like China and Russia, and economic competitors, like Brazil and the EU, that use trade and investment to wield power and expand their geopolitical leverage. For example, the EU has trade agreements with both Canada and Mexico. The Canada European Union Comprehensive Economic and Trade Agreement provides the EU duty-free access to Canada for pork, beef, and prepared meats, whereas the modernized Global Agreement with Mexico grants EU exporters tariff-free quotas for products such as pork loin, beef, and poultry legs. The EU's shirking of science- and risk-based trade is incongruous with North American agricultural production values and standards, and cannot be permitted to proliferate.

Even with these agreements in place, Canada and Mexico source meat, poultry, and live animals primarily from the U.S. thanks to our complimentary, integrated industries, and the significant investments both countries have made to maintain this trade fluidity with American farmers and ranchers. Preserving the USMCA will prevent the EU from gaining a stronger foothold in our neighbors' markets and will inhibit their ability to evangelize America's top trading partners to their protectionist regulatory requirements that have undermined U.S. exports in global markets. Similarly, Brazil has increased their beef and poultry exports to Mexico, and is now Mexico's second largest beef supplier after the U.S. While Brazil does not have preferential access to Mexico, the two countries have negotiated a framework agreement that could facilitate enhanced agriculture trade and displace U.S. exports if USMCA is discontinued. Consequently, USMCA's extension in its current form will unquestionably secure and ameliorate America's position as the leading economic power and agricultural supplier in Canada and Mexico, by squeezing the ability of China and America's leading agricultural trade competitors to siphon off market share that has been cultivated for decades by American farmers and ranchers.

### **USMCA is the World's Gold Standard Trade Agreement**

President Trump's decision to negotiate the USMCA during his first term resulted in an unprecedented, gold-standard agreement that advanced critical science- and risk-based sanitary and phytosanitary (SPS) principles, enshrined robust consultative and dispute settlement provisions, and secured binding access commitments that ensure a level playing field for American farmers, ranchers, agricultural producers, and meat and poultry companies. President Trump's America First Trade Policy Agenda envisions a fair, resilient trading system for American products; the USMCA is the most formidable vessel to buttress that objective.

For one, as referenced in the preceding paragraph, the USMCA requires Canada and Mexico to employ science- and risk-based SPS analyses, measures, and certification and demands implementation of improved audit procedures, import checks, equivalence assessments, and transparency measures to facilitate and increase the predictability of trade across North America. Likewise, improvements to disciplines on technical barriers to trade (TBT), including strengthened alignment on standards and regulations, make it easier for American meat and poultry exporters to ship products within the USMCA region. Often, American farmers, ranchers, and meat and poultry packers and processors are subject to excessive documentation requirements, onerous audit processes, unfounded animal health and production attestations on export certificates, and unwarranted, nontransparent testing and residue requirements, particularly in markets in Asia, South America, and Europe. These requirements, while lacking in scientific rigor, succeed in undercutting American export potential to high-value, growing markets, most frequently disadvantaging America's agriculture sector. These challenges are compounded by the proclivity of an increasing number of trading partners to disregard the U.S. Department of Agriculture's oversight of

America's food safety system and instead institute cumbersome plant and product registration processes that further restrict the export potential of America's agricultural producers and companies.

The USMCA's SPS chapter, on the other hand, ensures that in North America, U.S. exports and American businesses face the fewest regulatory impediments and enjoy the most unfettered access to the Canadian and Mexican markets. Importantly, USMCA's Committee on Sanitary and Phytosanitary Measures (Article 9.17) preserves this incomparable level of access for America's agriculture sector, by identifying, prioritizing, managing, and resolving bilateral and trilateral SPS issues to guarantee compliance with USMCA's provisions, while SPS Technical Working Groups (Article 9.18) are permitted to convene to address trade irritants. Similarly, the Agreement's Committee on Technical Barriers to Trade (Article 11.11) bolsters regulatory convergence and ameliorates collaboration to mitigate the adoption of trade-inhibiting laws.<sup>15</sup> Without these Committees and strong, binding SPS and TBT chapters, American meat and poultry producers and exporters could, in Canada and Mexico, be subject to the same excessive testing, documentation, and establishment barriers that preclude their access around the world. In short, the Agreement's complimentary and reinforcing SPS and TBT chapters are its crowning achievements.

In addition to securing comprehensive, enforceable SPS and TBT text, President Trump's USMCA modernized and streamlined trade facilitation procedures, which have appropriately reduced regulatory burdens facing American agricultural producers, businesses, and exporters without risking food safety or the integrity of our stringent import protocols. The Agreement's Customs Administration and Trade Facilitation chapter focuses specifically on standardizing duplicative, discordant customs policies and augmenting regulatory transparency with the intended goal of efficiently and effectively processing imports and exports, while simultaneously establishing a Committee on Trade Facilitation (Article 7.24) to promote ongoing review of customs administration procedures and existing and emerging regulatory constraints.<sup>16</sup>

Finally, in addition to the aforementioned consultative mechanisms, the USMCA institutes multiple fora for addressing issues, resolving disputes, and enforcing trading partner compliance with rendered decisions. For example, a modernized Committee on Agriculture Trade (Article 3.7) provides a platform for parties to discuss technical issues and trade barriers. Meanwhile, the Consultative Committees on Agriculture (Article 3.8), the Working Group for Cooperation on Agricultural Biotechnology (Article 3.16), and the Committee on Good Regulatory Practices (Article 28.18) provide additional avenues for cooperation, collaboration, and resolving trade issues, culminating in a robust chapter on dispute resolution (Chapter 31). Equally as groundbreaking is the agreement's Chapter on Labor (Chapter 23), which established the Rapid Response Labor Mechanism to penalize companies in Canada and Mexico for employing forced or low-wage labor to the detriment of American workers and companies.<sup>17</sup> These monumental achievements have dissuaded American companies from outsourcing jobs to our North American partners and have enabled American workers to remain competitive with those in Canada and Mexico – this is not the case with trading partners in Asia and other markets, where the lack of strong labor protections disadvantage American businesses and workers and make our products less competitive.

Thanks to the preceding provisions, the American meat and poultry industry faces few trade-restrictive regulatory hindrances when shipping products to Canada and Mexico. When issues do arise, the foregoing consultative and dispute settlement measures are appropriately designed to effectively adjudicate disagreements and – crucially – enforce decisions to guarantee compliance. Other concerns, like labeling issues and rejected or refused

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<sup>15</sup> "Agreement between the United States of America, the United Mexican States, and Canada," Office of the United States Trade Representative, last updated July 1, 2020, <https://ustr.gov/trade-agreements/free-trade-agreements/united-states-mexico-canada-agreement/agreement-between>

<sup>16</sup> Ibid.

<sup>17</sup> Ibid.

shipments, are more aptly handled via close collaboration among technical experts at USMCA food safety agencies, including the U.S. Department of Agriculture's Food Safety and Inspection Service, the Canadian Food Inspection Agency, and the Servicio Nacional de Sanidad, Inocuidad y Calidad Agroalimentaria (Mexico), and through existing forums for cooperation, like the U.S.-Canada Regulatory Cooperation Council, which is empowered to tackle bilateral regulatory constraints. The Administration's forthcoming implementation of its voluntary "Product of USA" regulation on January 1, 2026, which will enforce compliance for USDA-regulated products that bear voluntary U.S.-origin claims before they enter commerce, appropriately advances transparent labeling without adding undue mandatory compliance costs for American meat and poultry producers. The voluntary nature of this regulation also ensures American ranchers, farmers, and meat and poultry companies remain competitive both domestically and in the North American market, whereas compulsory regulations would have the unintended effect of disadvantaging meat produced in America while expanding Canadian and Mexican meat processing capacity. These and other issues do not merit changes to the existing text of the USMCA, nor do they warrant termination or renegotiation of the agreement by any of the three countries. The USMCA's incomparable text is equipped to handle most, if not all, regulatory and legal disputes, as well as existing and potential trade irritants and impediments.

Inclusion of a side letter on common meat names between the U.S. and Mexico and the U.S. and Canada is the principal addition that could benefit U.S. meat and poultry exporters – and it does not require revising or reopening the text of the agreement. Similar to the letter signed between USTR and Mexico's Secretary of the Economy upon the negotiation of USMCA that preserved market access for U.S. cheeses using common names, Mexico and Canada should sign a side letter presented by USTR that affirms both countries' commitment to protect market access for a list of specific common name meat products. This is particularly vital as both countries have formal trade ties with the EU, which has pursued a concerted global campaign to coopt common food and beverage names in trade and economic negotiations. As a template, USTR could use the letter on common meat name products that was negotiated with and signed by the Government of Chile<sup>18</sup>. The Meat Institute supports that letter in its current form and offered guidance to ensure it comprehensively addresses the universe of terms that are at highest risk in global markets. Attempts by the EU to restrict common meat terms that have been in the public domain for decades, if not longer, are anti-competitive and protectionist. Such restrictions cause undue harm to American producers by imposing onerous labeling, rebranding, and associated production costs. These specious policies cannot be permitted to thrive in two of the American meat industry's largest and most reliable export markets. Including letters that prevent such abuses by the EU will allow trade in high-quality, competitive U.S. meat products bearing generic names to continue unabated.

### **Conclusion: USMCA's Renewal and Preservation Are Critical to U.S. National and Economic Security**

By eradicating most tariffs on meat trade, further reducing poultry tariffs, streamlining regulatory and customs procedures and practices, mitigating and eliminating non-science-based trade impediments, and establishing mechanisms to resolve technical and other trade disputes, USMCA has been essential to the American meat, poultry, and livestock sector's unparalleled position within North America. Preserving the agreement is critical to the U.S. farm economy's future growth. The Meat Institute recognizes that other industries and sectors have legitimate and unresolved concerns, but these matters, along with any outstanding and emerging issues confronting the American meat and poultry industry, can be appropriately addressed leveraging procedures outlined in the agreement that are designed for those purposes. Resolutions to these concerns must not be contingent upon concessions that would risk the continuation of USMCA. Doing so would imperil American national security and economic prosperity.

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<sup>18</sup> "U.S. and Chile Sign Exchange of Letters to Protect Market Access for U.S. Cheese and Meat Products in Chile," Office of the U.S. Trade Representative, June 28, 2024, <https://ustr.gov/about-us/policy-offices/press-office/press-releases/2024/june/us-and-chile-sign-exchange-letters-protect-market-access-us-cheese-and-meat-products-chile>

As previously discussed, Canada and Mexico are vital markets for U.S. meat, poultry, and livestock products, often claiming the top two spots, reflecting the countries' reliability as consistent importers of American farm exports. The economic significance of the Canadian and Mexican markets for the U.S. meat, poultry, and livestock sector is directly tied to the mostly duty-free, unfettered access American exporters enjoy in the USMCA region. Risking this access would undoubtedly permit other competitors to gain market share in two of the most stable markets for American farmers and ranchers, and would assuredly cause American companies who rely on the additional, predictable revenue generated by trade with Canada and Mexico to shutter. Conversely, preserving USMCA will continue to yield billions in American farm and agricultural income to support rural communities, American businesses, and American workers across the country.

USMCA offers unmatched certainty to American businesses, fosters resilient supply chains and efficiencies, and is inextricably linked to the Trump Administration's focus on fortifying domestic food and agriculture production. The agreement encourages significant investments by Canada and Mexico in U.S. infrastructure and trade with both countries supplies American farmers with critical inputs at competitive prices to maintain the U.S.'s status as having the world's most abundant, affordable, high-quality food supply. Strategic trade and economic integration with Canada and Mexico make the U.S. more capable of weathering animal disease outbreaks, cyclical depressions in livestock availability, and natural disasters that could impair domestic food and agriculture production, while providing confidence to consumers and customers that the North American market applies the most stringent food safety and public health standards that keep our populations safe and less vulnerable to events in other less predictable, more antagonistic regions.

In short, USMCA has been a boon for the American meat, livestock, and poultry sector, along with the broader American food and agriculture economy and ancillary industries. It has provided steady income to American farmers, ranchers, and meat and poultry exporters; it has bolstered jobs for American truck drivers, ports, and transportation companies; it has buttressed American food retail and food service establishments; and it has accomplished these integral economic achievements through the implementation of transparent rules that allow American businesses to proactively plan supply chains and develop durable customer relationships. No other trade agreement can boast the same success. President Trump deserves enormous credit for this extraordinary achievement.

The Meat Institute appreciates the opportunity to comment on this important topic and respectfully encourages the Trump Administration to renew the USMCA in its current form for another 16 years. We stand ready to work with the Administration to support preservation of the USMCA for the benefit of American farmers, ranchers, food and agricultural producers, meat and poultry companies, and the broader U.S. farm economy.

Respectfully submitted,



Julie Anna Potts  
President and CEO