



National Association of State Departments of Agriculture

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November 3, 2025

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: Comments on the Operation of the Agreement between the United States of America, the United Mexican States, and Canada (Docket Number: USTR-2025-0004)

Dear Mr. Watson:

The National Association of State Departments of Agriculture submits the following in response to the Federal Register notice, seeking public comments on the operation of the United States – Mexico – Canada Agreement (USMCA) ahead of the Joint Review on July 1, 2026.

About NASDA

NASDA is a nonpartisan organization representing the unified voice of the commissioners, secretaries, and directors of the state departments of agriculture in all 50 states and four U.S. territories. State departments of agriculture serve both as co-regulators and as promoters of the agricultural products produced, processed, and distributed in both domestic and international markets.

The North American Free Trade Agreement (NAFTA) made Mexico and Canada two of the largest markets for U.S. agricultural products by establishing free trade. Its successor, the USMCA, continued to secure U.S. market access. This preferential market access has allowed U.S. industry representatives to build long-standing relationships and invest in USMCA markets.

Ahead of the 2026 Review of the USMCA, NASDA and its members reiterate our strong support for the continuation of the Agreement, underscoring the value of reducing or eliminating barriers, including tariffs, to trade of agriculture and food products in North America.

NASDA strongly supports extending USMCA for another 16 years to avoid disruption and harm to agricultural production and jobs across North America. NASDA encourages the administration to continue to advance science and evidence-based agricultural regulations and policies. NASDA's primary objective is to support expanded trade in North America, as well as to fully utilize our leverage as a robust trading block to improve our competitiveness on the world stage.

1. Agricultural Trade Highlights with Canada and Mexico

Canada 2024 Export Highlights¹

- Canada was the second-largest export destination for U.S. agricultural products, with exports totaling more than \$28 billion, reaching the same mark as in 2023.
- The U.S. is Canada's top supplier of agricultural goods with a market share of 55%.
- Chocolate and cocoa product shipments to Canada increased from \$290 million to nearly \$1.2 billion.
- Canada is the largest market for U.S. exports of consumer-oriented foods and beverages, valued a nearly \$21 billion in 2024.
- Bakery Goods, Cereals, & Pasta exports value at \$2.7 billion.
- Fresh fruit and vegetable exports totaled \$3.8 billion.
- Ethanol exports fell by 15%, valued at just less than \$1.5 billion.
- Chocolate and cocoa product exports increased by 33%, valued at nearly \$1.2 billion.

According to the USDA Foreign Agricultural Service report, in recent years Canada has entered into free trade agreements with other agricultural exporting blocs: the eleven-nation Comprehensive and Progressive Agreement for Trans-Pacific Partnership (CPTPP) and the Comprehensive Economic and Trade Agreement (CETA) with the EU. Canada is in the process of implementing a Canada-United Kingdom Trade Continuity Agreement following the UK's exit from the EU. Simultaneously, Canada and the UK are negotiating a comprehensive free trade agreement. Although Canada is a mature market with modest economic growth and low population growth, there remains significant export growth potential in Quebec, a regional economy the size of the Philippines, where U.S. products are underrepresented.

Mexico 2024 Export Highlights²

- U.S. agricultural exports to Mexico reached \$30.3 billion, a 7% increase from the previous record set in 2023.
- Mexico is the largest destination for U.S. agricultural products, ahead of Canada and China.
- The U.S. holds a 70% share of Mexico's agricultural import market, followed by the EU (11%), then Brazil and Canada, each with less than 10%.
- Corn and Pork & Pork Products were the top U.S. exports to Mexico in 2023.
 - **Corn** exports increased to \$5.6 billion (4%).
 - **Pork** exports increased by 10% in value to nearly \$2.6 billion.
- Significant increases in exports by volume include:
 - **Dairy products** increased by 7% to nearly \$2.5 billion.
- Mexico is the top export market for U.S. corn, pork, poultry, dairy products, wheat, and sweeteners.

¹ “2024 United States Agricultural Export Yearbook,” USDA FAS <https://www.fas.usda.gov/sites/default/files/2025-05/2024-Final.pdf>

² Ibid.

2. Tri-National Agricultural Accord

The Tri-National Agricultural Accord (the Accord) represents a long-standing commitment among the senior state and provincial agricultural officials from Canada, the United States and Mexico to collaborate on agricultural trade and development issues. The North American Free Trade Agreement laid the foundation for the Accord, with Mexico hosting the initial Accord in 1992.

One unique aspect of the Accord is the Consultative Committees on Agriculture (CCAs). The CCAs allow for bilateral meetings between the states, provinces, and their respective federal governments. Bilateral provincial and state working groups have traditionally engaged with respective CCAs during the Accord to receive updates, share information, and provide advice and analysis on trade and development issues.

The purpose of the Accord is for senior state and provincial agricultural officials of Mexico, the United States, and Canada to engage one another on agricultural trade and development issues in order to:

- reduce impediments to the free flow of agricultural products and resolve irritants;
- develop unified positions and pursue joint advocacy on issues important to agriculture in North America;
- provide federal governments with state and provincial perspectives and proposals;
- and support increased trade of food and agricultural products among the United States, Canada and Mexico.

States and provinces play a key role in the success of agricultural trade and development. The Accord provides the opportunity for collaboration in areas of mutual interest and ongoing dialogue on trade-related matters. It is an opportunity to build strong and resilient relationships between states and provinces, and to engage with respective federal governments.

34th Annual Meeting of the Accord

Provincial and state agricultural leaders from Mexico, Canada and the United States convened in Morelia, Michoacán, Mexico for the 34th meeting of the Tri-National Agricultural Accord from October 16th through the 18th, 2025.

In the final Communiqué presented to our federal partners within USDA and USTR, states and provinces solidified their support for the continuation of USMCA and for reducing, to the maximum extent practicable, both tariff and non-tariff barriers to trade in agriculture and food products in North America. The agreement has provided a predictable, science-based framework that facilitates trade and enables strong, mutually beneficial relationships in the sector. States and provinces have seen their agriculture and agri-food industries benefit from the comprehensive agreement and want to see USMCA continue.

3. NASDA Priorities regarding Canada

Canada and the U.S. depend on and benefit from a system of rules and institutions that provide certainty and stability for agricultural producers and businesses in the international trade environment. USMCA is a high-standard agreement that provides a stable, rules-based, and predictable trading environment for agricultural enterprises throughout North America. A successful review is a priority to maintain the benefits and continuity of this agreement.

USMCA-compliant U.S. and Canadian agri-food exports remain exempt from recent tariff measures imposed by both the U.S. and Canada, and we look forward to maintaining this stability, which supports the competitiveness of our enterprises.

Our colleagues from the Canadian Provinces noted that import tariffs outside of compliant agri-food products remain, continuing trade and investment uncertainty which instills unintended consequences across agricultural sectors.

2025 TNA Outcomes from the NASDA Delegation

U.S. States are supportive of the USMCA/CUSMA and reducing, to the maximum extent practicable, both tariff and non-tariff barriers to trade in North America. States and provinces support extending CUSMA/USMCA for another 16 years to avoid disruption and harm to agricultural production and jobs on both sides of the border.

U.S. States and Canadian Provincial Governments have regulatory, legislative and program delivery responsibilities specific to agriculture that are impacted by trade agreements and trade policy. It is important that U.S. States and Canadian Provinces are consulted and engaged in 2026 CUSMA review activities.

U.S. States encourage the federal government to engage with public and private stakeholders to ensure a positive outcome for the 2026 Review.

Resumption of the Consultative Committee on Agriculture

U.S. states and Canadian provinces sent letters to respective federal governments outlining interest in being engaged in USMCA committees under the agreement. The Canada-U.S. CCA has not met since 2016. This Committee is essential to ensuring consistent, regular communication between Canada and the U.S. on agricultural matters and is embedded in the USMCA agreement. Federal partners from the U.S. and Canada are responsible for calling meetings of the CCA.

States and provinces are interested in learning more about agriculture-related committees and in exploring opportunities to participate as observers. States and provinces would like to see the CCA resumed. States and provinces affirm their intention to work cooperatively to expand their roles in the ongoing implementation of the USMCA.

2025 TNA Outcomes from the NASDA Delegation

U.S. States encourage the federal government to resume Canada-U.S. CCA meetings.

U.S. States continue to request a virtual meeting in with USMCA/CUSMA committee leads (Committee on Agriculture, TBT, SPS, Biotech) no later than early 2026. U.S. States are also looking for opportunities to participate as observers in Committee meetings.

Dairy Trade with Canada

In May 2021, a dispute settlement panel was established to review U.S. concerns about Canada's administration of tariff rate quotas for increased market access agreed to under USMCA/CUSMA. States and provinces have continued dialogue on both U.S. and Canadian concerns and will monitor the decision of the dispute settlement panel. State and provincial leaders continue to fully support the Agreement and compliance with all provisions.

In 2022, the U.S. won favorable consideration with a USMCA panel, which agreed with the U.S. that Canada was breaching its USMCA commitments by reserving most of the in-quota quantity in its dairy TRQs for the exclusive use of Canadian processors. Canada updated its TRQ measures, but the U.S. challenged that Canada's dairy TRQ allocation measures still posed undue restraint on U.S. dairy exporters in the Canadian market. In November 2023, two of three panelists determined that the updated TRQ measures satisfied Canada's USMCA obligations.

The U.S. Administration, members of Congress, and the dairy industry have expressed disappointment with the second USMCA dairy dispute ruling.

NASDA urges the administration to explore options to clarify the intent and implementation of dairy provisions of the USMCA/CUSMA agreement.

2025 TNA Outcomes from the NASDA Delegation

U.S. States recognize that despite the outcome of the recent USMCA dispute resolution, there remain ongoing concerns regarding U.S./Canada dairy trade and believe that open-minded, constructive dialogue should continue among federal, state, and provincial agriculture leaders from Canada and the U.S. to share and understand our collective concerns.

Science and Evidence-Based Trade

U.S. states and Canadian provinces have similar interests in sharing information about North America's resilient agriculture production practices at international forums to address mutual concerns with non-science-based regulations promoted by other countries. U.S. states and Canadian provinces remain focused on gaining global recognition of our agricultural practices that maintain productivity and conserve and sustain our resources for the economic, social, and environmental benefits of future generations. States and provinces have worked consistently to

balance the costs and benefits of science-driven production practices to maintain health and food safety while ensuring the economic vitality of the sector.

States and provinces are concerned with the movement among certain nations, such as those within the European Union, to implement policies using the precautionary principle that create trade-restrictive measures and threaten global food security, such as the EU deforestation regulations.

It is critical for the USMCA to maintain and continue to champion science- and evidence-based regulations. States and provinces are concerned with rhetoric and various government initiatives that are pursuing regulatory changes in food packaging, labelling, food additives, and ingredients such as seed oils that are not based on science or risk assessments. States and provinces must work together to ensure regulations and narratives on agriculture and food products in North America are not promoting anti-pesticide, anti-glyphosate, anti-biotechnology, and anti-oilseed positions.

2025 TNA Outcomes from the NASDA Delegation

U.S. States urge U.S. federal departments to ensure regulatory decisions, guidelines, and discourse are based on science and evidence, and to champion that science and evidence-based approach to regulation internationally, including with the EU. Leading by example in this regard is imperative to the success of the agriculture sector.

4. NASDA Priorities regarding Mexico

Implementation of the USMCA remains a top priority for state and provincial agriculture leaders. Implementing USMCA will strengthen agri-food trade and supply chains and modernize existing or create new committees to engage on agri-food trade.

Implementation of the agreement can and must focus on (a) enforcement of labor/environmental standards; (b) biotechnology; (c) geographic indicator provisions; (d) agricultural governance provisions; and (e) other areas of mutual interest.

2025 TNA Outcomes from the NASDA Delegation

U.S. States request the development of recommendations for sub-national roles in USMCA agricultural governance processes and enhance dialogue on issues related to trade in certain commodities.

Emerging Animal Disease Preparedness

Effective communication and planning between state and federal entities and industry stakeholders are necessary to help prevent, mitigate and eradicate diseases. NASDA wants to ensure that dialogue continues and expands with our trading partners in North America and elsewhere.

The recent Avian Influenza outbreak has shown the importance of collaboration among all federal, state, and industry stakeholders to ensure an effective response that rapidly eradicates animal disease outbreaks.

Through a partnership with USDA-APHIS and industry, NASDA is increasing our role in coordinating across state lines in response to an African Swine Fever outbreak. An outbreak could cripple the entire swine industry with long-lasting ramifications for the economic viability of all livestock sectors and the feed industry. We encourage the same coordinated response efforts across the border to ensure we can continue business continuity as soon as possible.

NASDA, along with our colleagues from Mexico and Canada appreciate the tremendous support we received from USDA-APHIS and the team at Johns Hopkins University, Applied Physics Laboratory to coordinate and fund a multi-country tabletop exercise involving federal, state/provincial, industry and academic partners focusing on various scenarios (e.g. wild pigs, detection on a farm, detection in a food product imported from another country, etc).

As we continue to respond to Highly Pathogenic Avian Influenza and prepare for the potential introduction of ASF and New World screwworm, we must remain vigilant to the threat of other foreign animal diseases.

U.S. collaboration to prevent the introduction of foreign animal diseases in North America is a top priority, and this collaboration must include the federal and state/provincial governments from all three countries.

2025 TNA Outcomes from the NASDA Delegation

U.S. States request the federal government share information and best practices for cross-jurisdictional collaboration and help identify gaps in foreign animal disease prevention and response.

U.S. States support continuing efforts across North America to prepare for and rapidly respond to foreign animal diseases, including stockpiling of vaccines.

Agricultural Technologies

In March 2023, Canada and the U.S. held technical consultations with Mexico under the SPS Chapter of the USMCA. In June 2023, the U.S. formally requested dispute settlement consultations under USMCA and Canada joined as a third party. In December 2024, a USMCA dispute settlement panel ruled in favor of the U.S. challenge of Mexican biotechnology measures concerning genetically engineered (GE) corn. The panel found Mexico's GE corn measures were not science-based and undermined market access that Mexico agreed to in USMCA. Mexico has acknowledged that their policies were violative of the agreement demonstrating the wisdom of the biotechnology provisions of the agreement and how similar language must be included in bilateral and multilateral agreements moving forward.

2025 TNA Outcomes from the NASDA Delegation

U.S. States support the biotechnology provisions under USMCA and urge the federal government to ensure Mexico remains in compliance with the underlying agreement and the determination of the dispute panel's final decision.

U.S. States urge a factual and science-based decision-making approach.

U.S. States support regulations that foster new technologies, while preserving high regulatory standards, including all types of technologies that benefit American producers and consumers.

U.S. States support technologies that increase agricultural efficiency and enhance agricultural sustainability.

U.S. States support advancing science-based technological innovations and robust funding for research and development.

U.S. States support diversification of technology focusing on decreasing technology costs and improving adoption.

U.S. States encourage federal policies to recognize the privacy of agricultural producers and private citizens, emphasizing that privacy concerns must be addressed in the development and use of new technology.

U.S. States support and encourage outreach and education to key impacted stakeholders and consumers on new technology developments to increase understanding and acceptance of these technologies.

5. Conclusion

As our nation prepares for the 2026 USMCA review, NASDA reaffirms its strong support for continuing the USMCA and reducing, to the maximum extent practicable, both tariff and non-tariff barriers to trade in agricultural and food products across North America. The agreement has provided a predictable, science-based framework that promotes trade and fosters strong, mutually beneficial relationships in the sector.

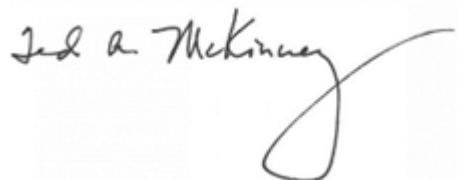
At the 34th meeting of the Tri-National Agricultural Accord, states and provinces reaffirmed their strong support for the continuation of USMCA, which has benefited the integrated agricultural sector across all three countries by increasing trade since its implementation. They reiterated the need for strong engagement with the federal government during the 2026 USMCA Review activities. Additionally, states and provinces strongly support extending USMCA for another 16 years to maintain trade certainty and prevent disruptions or harm to agricultural production and jobs on both sides of the border.

NASDA urges our federal partners to resume bilateral CCA meetings and, as lead state agricultural officials, to engage with agriculture-related committees under USMCA.

NASDA reaffirms its commitment to ensure that agri-food policies continue to be based on science and evidence and urges our federal partners to champion these principles across North America and globally. Divergent approaches undermine opportunities for innovation, trade, and economic growth that benefit our farmers and ranchers.

Thank you for your consideration and your ongoing commitment to seeking advice and counsel from lead state agricultural officials. If you have any questions regarding our comments, please contact, Senior Director of Public Policy, RJ Karney, RJ.Karney@NASDA.org.

Sincerely,

A handwritten signature in black ink, appearing to read "Ted a McKinney".

Ted McKinney
CEO
NASDA