

May 15, 2026

ELECTRONIC SUBMISSION TO <http://www.regulations.gov>

The Honorable Jeffrey Goettman
Deputy United States Trade Representative
Office of the United States Trade Representative
600 17th Street NW
Washington, DC 20508

**Re: U.S. Agriculture Industry Views
Request for Comments on the Modernization of the African Growth and
Opportunity Act (USTR-2026-0166)**

Dear Ambassador Goettman:

The undersigned associations representing farmers, innovators, and the broader American agricultural sector support your efforts to modernize the African Growth and Opportunity Act (AGOA). The continent of Africa holds significant opportunity for U.S. agricultural exports but nontariff barriers on biotechnology must be addressed to access these markets.

AGOA provides duty-free trade access to eligible countries intended to generate economic benefits while fostering a closer relationship with the United States. As part of these eligibility requirements, countries must make meaningful progress to eliminate barriers to trade and investment. Unfortunately, the vast majority of countries in Africa have not adopted policies that facilitate trade in agricultural biotechnology products, which closes off these markets to American farmers, who need to diversify and unlock new markets around the globe. These barriers also undermine the food security and agricultural development in nations that are seeking to develop their food and agriculture sectors to drive economic growth. Some countries in Africa impose country-wide bans on any importation of agricultural biotechnology, and for those countries that have regulatory systems for agricultural biotechnology in place, significant challenges remain that delay or prevent the sale of U.S. biotech crops.

Agricultural biotechnology allows crops to be more resilient while using less inputs. This leads to on-farm benefits such as reduced fuel and pesticide use, increased yield and productivity gains, and financial savings for farmers. Because of the innovations provided by biotechnology, American farmers are the most bountiful producers in the world. As the population in Africa increases and the middle class grows, demand will only increase for protein sources that rely on animal feed. U.S. grains and oilseeds are poised to meet that demand. The U.S. government should pursue opening U.S. export opportunities into these emerging markets by negotiating new opportunities for U.S. farmers and eliminating nontariff barriers on agricultural biotechnology.

This effort to modernize AGOA provides an important moment in time to establish criteria that foster market access opportunities for American farmers and can set the stage for future trading relationships that are mutually beneficial. Without encouraging AGOA recipients to align with U.S. policies relating to agricultural biotechnology, African customers are more likely to

continue aligning policies with countries that do not prioritize science and do not adhere to international standards. A continuation of the status quo will not only limit development in Africa, but it will relegate American farmers to residual market share when, in actuality, the quality and standards upheld by American farmers and exporters are second to none.

We implore you to advance efforts that open the door for American agricultural exports by prioritizing progress on agricultural biotechnology policies. We note that a number of countries have adopted streamlined approvals for agricultural biotechnology products as part of the ongoing agreement on reciprocal trade (ART) negotiations; however, no ARTs have been announced with African countries. We view AGOA as a complementary tool to incentivize alignment with U.S. trade policy. We stand ready to provide the necessary expertise, information and guidance needed to harness new trading partners in Africa that are eager to do business with American farmers. Thank you for your attention to our views.

Sincerely,

National Corn Growers Association
Agricultural Retailers Association
American Farm Bureau Federation
American Society of Agronomy
American Seed Trade Association
American Soybean Association
Crop Life America
Crop Science Society of America
Farm Journal Foundation
Independent Professional Seed Association
National Association of State Departments of Agriculture
Soil Science Society of America
U.S. Grains and Bioproducts Council

CC: The Honorable Julie Callahan, Ambassador, Chief Agricultural Negotiator, Office of the United States Trade Representative