



November 3, 2025

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

Re: Docket USTR-2025-0004 *Request for Public Comments and Notice of Public Hearing Relating to the Operation of the Agreement Between the United States of America, the United Mexican States, and Canada*

Dear Ambassador Greer,

Western Growers (WG) welcomes the opportunity to provide comments on the review of the U.S.-Mexico-Canada Agreement (USMCA).

WG is an agricultural trade association headquartered in California. Our members are small-, medium- and large-sized businesses that produce, pack and ship fruits, vegetables, and tree nuts from our home states of California, Arizona, Colorado, and New Mexico. Beyond our home states, WG members produce in – and directly contribute to the economies of – more than 30 states in the United States. In total, our members account for roughly half of the annual fresh produce grown in the United States, providing consumers with healthy, nutritious food. Indeed, WG has long had the slogan “We grow the best medicine.”

For the collective fresh produce industry, Canada and Mexico are by far the top two export markets. Over the past thirty years, North American free trade cooperation has resulted in U.S. produce exports ramping up from \$1.4 billion in 1995 to \$6.2 billion in 2024 - an astonishing 330 percent growth. For the extremely diverse U.S. fresh vegetable sector, 87 percent of its roughly \$2.5 billion exports are destined for Canada and Mexico annually;¹ for Canada, U.S.-origin product represents nearly half of all the country’s fresh produce imports. Through our dedicated grower, packer, and shipper members, WG itself represents a significant share of the U.S. grown fresh produce that is sent to our neighboring trading partners. Our four home states alone comprised 42 percent of the \$4.36 billion in fruit, vegetable, and tree nut exported to Canada and Mexico last year.²

WG strongly supports the continuation of a free trade agreement with our North American neighbors and opposes any withdrawal or reversal of our long-standing trade commitments. At the same time, significant improvements can and should be made to USMCA.

Maintain tariff-free access and formal trade dispute resolution

Tariff-free access for fresh produce into our northern and southern neighbor markets was first gained under NAFTA. This supply chain is valuable and has provided North American consumers with greater access to healthy options, so it is vital the flow remains undeterred by tariffs and non-tariff barriers. It should also be noted that a

¹ USDA-FAS, Global Agricultural Trade System. Retrieved Sept 29, 2025

² U.S. Census Bureau. Economic Indicators Division USA Trade Online. Retrieved Sept 29, 2025

substantial amount of U.S.-grown produce is exported into both countries for additional value-added processing before it is re-imported back into the United States.

We recognize that since the beginning of the year, this Administration has pursued unprecedented levels of trade engagement with other countries, as well as aggressive tariff actions on a global- and country/sector- specific level. WG appreciates that, so far, all three USMCA signatory governments have generally been responsive to our collective industry's request for USMCA-compliant agricultural products to be spared.

WG strongly supports maintaining this crucial tariff-free access. While there may be some exceptions tied to trade adjudications or other specific cases, the general rule should be duty-free access. WG also urges the United States and its partners to affirm that any renewed USMCA's framework and tools – including allowable trade adjudications – should be the primary vehicle to address trade issues between the signatory nations.

Enhancing food safety in North American produce trade

Food safety outbreaks are significant events in the United States with thousands of citizens sickened or worse annually. In 2019, the Center for Disease Control (CDC) found that foodborne illness accounted for over 53,000 hospitalizations and 931 deaths.³ Health care costs can range into the billions annually and outbreaks also cause equally massive economic consequences in terms of the actual cost of recalls and the destruction of markets as consumers avoid food. With respect to the produce industry, in the ten-year period between 1998 and 2008 about half of all outbreak hospitalizations and a quarter of foodborne deaths were caused by produce.⁴⁵ Within the produce sector CDC data shows between 1996 and 2014 more than half of all produce-related foodborne outbreaks were caused by produce sourced from foreign countries.⁶

Because of this historical record of outbreaks, the U.S. government has increased its engagement and oversight over the produce sector. This effort has resulted in increased government inspection of domestic farms and significant private investment by the producers themselves in enhanced food safety systems.⁷ However, food safety compliance cannot stop at the border. In 2021 roughly 60% of all fruit consumed in the United States was imported and nearly 40% of all vegetables.⁸ Mexico is by far the largest exporter of produce to the United States accounting for 34% of all fresh fruit and 73% of fresh vegetable imports. Canada is by far the second largest vegetable exporter into the United States.⁹

To ensure a safe food supply enters the United States, and to protect domestic markets from collapse due to lost consumer confidence, WG strongly recommends that oversight of produce imports be strengthened in an updated

³ Scallan Walters et al. [Foodborne Illness Acquired in the United States—Major Pathogens, 2019](#). Center for Disease Control (CDC). April 2025

⁴ Painter et al. [Attribution of Foodborne Illnesses, Hospitalizations, and Deaths to Food Commodities by using Outbreak Data, United States, 1998–2008](#). CDC. Mar 2013

⁵ Yang, Xuerui, and Robert Scharff. "[Foodborne illnesses from leafy greens in the United States: attribution, burden, and cost](#)." *Journal of Food Protection* 87.6 (2024): 100275. (Leafy greens responsible for up to 2,307,558 foodborne illnesses annually in the U.S. with an economic cost of \$5.278 billion annually)

⁶ Gould, L. Hannah, et al. "Outbreaks of disease associated with food imported into the United States, 1996–2014." *Emerging infectious diseases* 23.3 (2017): 525.

⁷ Hamilton and McCullough. [Two Decades of Change: Evolving Costs of Regulatory Compliance in the Produce Industry](#). Cal Poly, San Luis Obispo. Jan 2025. (Regulatory costs comprised just 1.24% of production costs in 2006, rose to 8.9% in 2017, and are now calculated at 12.6% of production costs) Note: Food Safety Modernization Act exempts certain smaller domestic operations from mandatory FDA compliance, but USDA engages those operations on a voluntary basis to improve their food safety systems.

⁸ Zahniser, Steven. [Imports make up growing share of U.S. fresh fruit and vegetable supply](#). USDA-ERS. Jul 31, 2023

⁹ Riberia and Young. [Outlook of Fresh Fruits and Vegetables in the United States](#). Texas A&M. March 2024

USMCA. More specifically, the United States should establish a two-step inspection process that would be put in place on all imports after an outbreak occurs and the source can be traced to a Mexico- or Canada-based operation:

#A: FDA will increase the inspection rate of incoming produce from the source country. Currently the United States inspects less than 2% of all food imports.¹⁰ We propose that if an outbreak occurs from an identified foreign source, then randomized physical inspections (sampling and testing) of that crop at the port of entry should be increased to 10% for that specifically identified farm. These higher testing rates would remain in place for the remainder of the growing season/export season of the product in question, *and* one growing season into the future to ensure safety. Furthermore, while FDA currently focuses on individual companies and suppliers for testing and certification of safety after a positive, in this instance if an FDA traceback cannot identify a specific farm (or group of farms), sampling should target product coming in from the region in question. Sampling of these larger pools should be at the 5% rate rather than the current 1-2% rate. Naturally repeated positive tests should trigger a hold on all imports from that farm or region until the United States is provided reasonable verification of food safety control.

#B: FDA personnel would conduct on-farm food safety system inspections in Mexico or Canada. Such a system is not without precedence; USDA completes on-farm inspections for pests in the Mexican avocado sector by hiring and training on-the-ground personnel. We likewise believe FDA should hire and train staff to conduct on-farm inspections in a source country in the immediate wake of an outbreak linked to Mexican or Canadian produce. Inspection manuals and requirements would be based on documents FDA currently uses domestically during an outbreak investigation of a potential source US farm, as well as training they do with various states who might be contracted to conduct domestic farm FDA inspections. Materials would be modified and customized for language needs and local circumstance. FDA on-farm inspection in Mexico or Canada would focus on farms identified in an outbreak investigation. To enhance traceability Canadian and Mexican imports shall be subjected to section 204(d)(2)(B) of the FDA Food Safety Modernization Act. If produce has been aggregated and no individual farm can be identified as the source of an outbreak, then all farms identified via traceback activities will be subject to timely investigation by the FDA. If even that is not possible then surveillance testing at the field, post-harvest or packing step in a Mexican or Canadian growing region that was the origin of an outbreak would occur. If systems on farm are deemed inadequate, then the FDA would (as it does domestically) place the foreign grower on notice to remedy failings and upgrade systems, and if they cannot (or a grower refuses inspection access), then entry into U.S. commerce would be prohibited just as it would for a U.S.-based operation subject to FDA investigation.

The above steps would be a modification of existing FDA practice. FDA currently has a foreign inspection workforce of 20 and globally conducts less than 1,000 foreign facility inspections annually (all types of food) out of a universe of 125,000 foreign facilities.¹¹ The concept is to focus limited resources on facilities, or crop types, that are the source of a U.S. outbreak and use a combination of U.S.-based inspections at ports of entry and North American-based, in-person on-farm investigation.

Note while this would reallocate resources, FDA would still conduct some routine port of entry inspections for North American produce. Any positive pathogen test following routine testing at the border for fresh produce should result in both an Import Alert for the importer and the Mexican or Canadian farm and an FDA investigation at the farm level. This is equivalent to the FDA follow up actions when U.S.-grown produce tests positive either through surveillance sampling and/or during retail sampling.

¹⁰ Ahn, Jae-Wan. [India and Mexico Top Sources of Pathogen-Based U.S. Food Import Refusals](#). USDA-ERS. Feb 7 2022

¹¹ [FDA Should Strengthen Inspection Efforts to Safeguard the US Food Supply](#), GAO-25-107571, p. 9-11. Jan 8, 2025

Packaging provisions in North America

Our industry has been gravely concerned by various international efforts to ban, phase out, or restrict packaging. Most notably, Canada in recent years has proposed requiring large grocery retailers to create a pollution prevention plan (P2) to meet reuse and recycle targets by eliminating unnecessary packaging, displacing single-use packaging with reuse-refill systems, and providing food-safe plastics designed to be reused, recycled, and composted.¹² As written the proposal is exceedingly aggressive in scope and timeframe, and compliant packaging alternatives are not realistically available. The estimated impact is significant; a 2024 Farm Foundation study (supported by USDA) found that Canada's proposal could result in economic losses of up to \$2.8 billion for the U.S. fresh producers, and increased costs with less choice for Canadians.¹³

The fresh produce supply chain faces many unique challenges: high perishability, susceptibility to damage, potential contamination by harmful pathogens, and limited availability by season or region. Decades of packaging innovations and development have made fresh fruits and vegetables more available to consumers in a variety of formats year-round. Many categories of whole produce like apples, citrus, cucumbers, and avocados utilize consumer-facing packaging for bulk purchases, customer convenience and sizing considerations. Others – like berries and table grapes - are too fragile to move completely unpackaged. Additionally, there are dozens of fresh-cut, ready-to-eat offerings like baby carrots, pre-sliced apples, chopped vegetable trays, and salad kit bags. This latter category is a fast-growing, high demand segment of the produce industry that has bolstered fruit and vegetable consumption since it offers consumers convenient options to better incorporate them into their diets.

Across all varietal categories, the industry has invested immeasurable time and money towards carefully developing packaging that supports existing harvest and processing practices, preserves safety and quality, withstands transport and handling, communicates nutritional information, and meets consumer standards. While the P2 proposal is currently on hold due in part to court challenge, the issue has not gone away. While produce growers across the United States are investing time and energy into new sustainable packaging innovations such developments take time and there are competing needs placed on packaging. In some cases, such as in the value-added produce universe, which generated \$14.6 billion in sales in 2024¹⁴, simply cannot exist without some form of packaging.

WG requests that a renewed agreement contains a trilateral commitment to constructively engage on produce packaging harmonization, exchanging information on research and technologies and market alignment. Such an agreement would be in tandem and supportive of ongoing efforts being undertaken by industry stakeholders across the produce supply chain, including Canadian and Mexican entities. Through this collaboration, the industry would identify the needs of various produce commodity types, analyze the current state of packaging technology, and lay the groundwork for a singular harmonized guidance for fresh produce packaging in North America. Indeed, some public-private collaboration within the fresh produce space is already happening via the Sustainable Fresh Produce Packaging Roadmap.¹⁵ The intent is to make packaging more sustainable through incremental and voluntary efforts. Conversely, all three countries should refrain from unilaterally imposing requirements that are inconsistent and detrimental to international trade, consumer preferences and add to food inflation.

¹² [Consultation document: Pollution prevention planning notice for primary food plastic packaging](#), Environment & Climate Change Canada. Aug 2023

¹³ Grant and Legrand. [Assessing the Market and Trade Impacts of Canada's Proposed Plastic Packaging Restrictions](#). Farm Foundation Issue Report. Feb 2024

¹⁴ Mills, Emily. [Find out what's in FMI's Power of Produce 2025 report](#). *Produce Grower*. Apr 21, 2025

¹⁵ See, <https://go.wga.com/sppa-sustainable-produce-packaging-alignment>

Labor reforms and protections in Mexico

Due to the extensive need for skilled human hands in the growing and harvesting of fresh produce, labor's share of the cost of production can run as high as 38 percent for fruit and tree nut farms and 29 percent for vegetables and melons.¹⁶ Moreover, average hourly earnings of U.S. agricultural workers increased 16 percent between 2001 and 2019, outpacing that of non-agricultural wages (5 percent growth) and affirming the distinct challenges of finding sufficient labor for our farms.¹⁷ Given this reality, one of the biggest persistent disadvantages U.S. producers of produce can and do have when competing against imports is the disparity in labor costs and standards.

Western Growers previously raised this as a top issue during the NAFTA renegotiations under President Trump's first administration. Ultimately, significant labor reforms were enshrined (when compared to historical precedent) to primarily address Mexico's comparatively lax standards. This included wage increase commitments, stronger collective bargaining protections and pathways for each country to sanction each other for violations.

There have certainly been successful changes to Mexican labor laws and positive results for certain sectors through the Rapid Response Mechanism. Nevertheless, full compliance has not been realized. Indeed, the Independent Mexico Labor Expert Board (IMLEB) – comprised of 12 members appointed by Congressional leadership and the Administration – was established to monitor and evaluate the implementation of Mexico's labor reform and compliance with its labor obligations under USMCA. That Board recently reported that Mexico is not in compliance with its USMCA labor obligations.¹⁸

For decades, we have seen domestic production move to Mexico (or shrink outright) as imports continue to rise and remain comparatively cheaper. USDA-ERS found that, over the periods spanning 2000–2002 and 2017–19, U.S. production by volume of fresh fruit and vegetables changed little; some commodities like raisin grapes, melons, iceberg lettuce, and fresh-market field tomatoes declined outright. Over the same timeframes, imports of fresh fruit increased by 129 percent and fresh vegetables by 155 percent.¹⁹ From Mexico's side, 90 percent of its fruit exports and 95 percent of its vegetable exports go to the U.S, making it the singular market for Mexican growers to concentrate their production.²⁰

This Administration has made it a priority to support U.S. agriculture and bolster “Buy American”, and rightly so. It is therefore imperative to recognize this labor cost gap is one of several key pressure points impacting domestic production and incentivizing American producers to invest more heavily in Mexico.

Reinforcing USMCA's labor requirements in Mexico will foster fairer competition with the United States. WG strongly supports efforts to reinforce and build upon USMCA's labor provisions, with consideration given to the recommendations made by the IMLEB²¹.

Child labor in Mexican agriculture

In 2024, The U.S. Department of Labor (DOL) reported that Mexico “made significant advancement in efforts to eliminate the worst forms of child labor” but also noted that the number of inspectors lags far behind the number needed to provide “adequate coverage” for Mexico's 60.5 million workforce. DOL also reported that the Mexican

¹⁶ Martin and Simnitt. “[U.S. Fruit and Vegetable Industries Try To Cope With Rising Labor Costs](#)”. USDA-ERS. Dec 28, 2022

¹⁷ Ibid.

¹⁸ Report of the Independent Mexico Labor Export Board, October 6, 2025 at page 52 found at https://aflcio.org/sites/default/files/2025-10/IMLEB_REPORT_2025_10_06.pdf

¹⁹ See, Martin and Simnitt

²⁰ [US Fresh Fruit and Vegetable Imports](#). Rural Migration News Blog, University of California Davis. Oct 2023

²¹ Report of the Independent Mexico Labor Export Board, October 6, 2025 at pages 56-58 found at https://aflcio.org/sites/default/files/2025-10/IMLEB_REPORT_2025_10_06.pdf

government has not provided “complete information on labor and criminal law enforcement efforts to address the worst forms of child labor.”²²

American growers operating in Mexico are often subject to retailer-mandated third-party certification requirements that include prohibitions on use of or reliance on child labor. To the degree that growers operate outside these provisions, the potential for child labor exploitation represents both a humanitarian and economic ill. As such, we urge the Administration to embed existing DOL recommendations in a renewed USMCA agreement to further curb and eliminate child labor in Mexico.²³ To ensure faster compliance in this area, we suggest the Administration consider negotiating temporary tariffs on any crop types if completion or progress is not met in that crop type by an agreed-upon deadline.

Cartel proliferation within Mexican agriculture

For years cartels have infiltrated the Mexican fresh produce industry to veil their operations, launder money, smuggle contraband, and generate revenue. Four of the top producing states for fruits and vegetables – Jalisco, Michoacán, Sinaloa, and Sonora – are also notoriously inundated with cartel activity and control.²⁴ Ag producers, transporters, packers, and inspectors are routinely subject to bribes, aggressive extortion, and outright violence. Cartels have mastered methods of detaining transport-related corridors and drivers' quotas while also intercepting consignment deliveries to guarantee that they retain control over prices and/or supply chain direction.²⁵ More directly, cartels will take over farming lands, becoming ‘informal owners’ of the fields or installing orchards on protected woodlands.²⁶

Ultimately, cartel activities to manipulate production and markets create pricing and supply opaqueness and unpredictability. *Prices for legitimate product can be driven down and impact competition, or they can be driven up and harm consumers.*²⁷

To date, the Administration has designated these cartels are terrorist organizations,²⁸ and the federal government has existing mechanisms to automatically detain goods that may be produced by illegal labor and terrorist organizations. Whether embedded within the USMCA or negotiated outside the agreement as a standalone bilateral pact, WG urges the U.S. government to require Mexico and its financial system to more aggressively help identify and target cartel-infiltrated businesses and their corresponding use to launder money, potentially resulting in product sold in U.S markets irrespective of true market conditions. The U.S. government should act more forcefully to implement its existing mechanisms against cartel owned businesses and cartel-linked products. By scrutinizing and blocking illicit imports, we could disincentivize cartels from taking over and owning (or being a silent partner in) legitimate farming operations. Lastly, all three countries should commit to tackling drug smuggling via food products. The respective departments of agriculture must be involved, and there should be consideration of staffing and technological enhancements to improve scope and accuracy.

²² Bureau of International Labor Affairs, [Child Labor in Mexico: Findings from the U.S. Department of Labor](#), U.S. Dept of Labor

²³ Ibid. at “Suggested Government Actions to Eliminate Child Labor”.

²⁴ Henkin. [Major Cartel Operational Zones in Mexico](#). National Consortium for the Study of Terrorism & Responses to Terrorism. Jun 2020

²⁵ [Mexican cartels profit from the avocado boom, the star fruit in the US](#). Universidad de Navarra. Mar 20, 2025

²⁶ [Green Gold: How Mexican Drug Cartels are Profiting From Avocados](#). Fintrail. Aug 16, 2022

²⁸ [Treasury Takes Decisive Action Against Violent Mexican Cartels](#). U.S Treasury. Aug 14, 2025

Bankruptcy protection and reciprocity

Among the key challenges in perishable agricultural trade across North America is the issue of payment security - specifically, the absence of a reciprocal, enforceable mechanism to protect growers and shippers of fresh produce against non-payment stemming from bankruptcies or insolvencies.

In the United States, provides a trust mechanism as part of the Perishable Agricultural Commodities Act (PACA)²⁹ establishes a statutory trust³⁰ that grants fresh produce shippers first-priority creditor status in the event of a buyer bankruptcy. This protection is essential, as highly perishable products cannot typically be reclaimed or resold.

However, for decades U.S. shippers have not had comparable protection under Canadian or Mexican law. After years of advocacy, Canada addressed this gap with the passage of Bill C-280 at the end of 2024, creating a PACA-like deemed trust and establishing reciprocal protection for shippers on both sides of the U.S.-Canada border.³¹

WG now urges that Mexico adopt a similar mechanism – modeled on the USDA-PACA Trust and Canada’s Bill C-280 – to provide equivalent protection for exporters of perishable agricultural commodities. Such a tool would establish trilateral safeguards, ensuring fair and secure trade across all three North American markets.

Canada seasonal requirements for romaine

Since 2019, the Canadian Food Inspection Agency (CFIA) has implemented additional import requirements (e.g. control measures) during the fall period for U.S. romaine lettuce (September to December). During this time, any imported romaine lettuce and/or salad mixes containing romaine lettuce must contain either a Proof of Origin that the romaine lettuce was grown outside California’s Salinas Valley region or if grown within the Salinas region that a CFIA approved sampling and testing has been conducted with a negative E. coli O157:H7 result.³²

While they are scientifically justified and reflect Canada’s responsibility to protect public health, they also create a significant trade barrier. The requirements are broad, not dynamic, and focus on hazard-based prevention rather than risk-based prevention. It does not account for variability in environmental conditions or grower-level interventions that can meaningfully reduce risk. As a result, the measures impose disproportionate economic and logistical burdens on growers and importers, and these overly broad measures create trade friction without fully optimizing food safety outcomes.

WG and its members are committed to ensuring food safety and consumer confidence, and we remain a cooperative industry partner with U.S. and CFIA officials in this endeavor. In this renegotiation, we request that both countries commit to fairer treatment of U.S. leafy greens, moving away from these control measures and toward a more flexible, risk-based system.

Pest and disease inspections in Mexico’s avocado industry

Since 1997 the United States has had a two-tiered inspection protocol in place for Mexican avocados to ensure American growers are safe from invasive pests. This Operational Work Plan (OWP) involves in-field inspection of Mexican groves by USDA-hired and trained personnel, and then re-inspections at Mexican packing facilities. The success of the OWP has afforded U.S. avocado growers pest-free growing conditions and led to a multi-billion-dollar sector enjoyed by millions of Americans each year.

²⁹ [Perishable Agricultural Commodities Act](#). 7 U.S.C. Chapter 20A.

³⁰ 7 U.S.C. 499e(c)

³¹ [C-280](#), the *Financial Protection for Fresh Fruit and Vegetable Farmers Act*. Parliament of Canada.

³² Watters, Alexandra. [Canada to Re-Implement Temporary Import Requirements for US Romaine for Fall 2025](#). USDA-FAS. Jul 16, 2025

Unfortunately, in recent years in-field inspection by USDA-APHIS personnel has become hazardous due to cartel interference and threats. Notably in 2022 and 2024, USDA suspended inspections due to reported threats against Mexican USDA personnel by drug cartel operatives, which in turn temporarily halted a large segment of avocado imports.³³ In 2024, USDA then abruptly announced it was modifying the OWP, permanently withdrawing APHIS in-field inspectors and turning over all sampling and certification responsibilities to Mexican counterparts.³⁴ Packinghouse re-inspections have also been pared down.

We recognize how dangerous experiences with cartel violence could lead USDA to take such an approach. Nevertheless, the lack of on-the-ground USDA oversight has rapidly led to a decline in pest prevention, as the number of detections in Mexican processing facilities have significantly increased. Before in-field inspections ceased there were no processing plant detections. After the change, more than 150 distinct interceptions at packing facilities were recorded over a four-month period.³⁵ This clearly shows that the previous two-step process provided clear benefits and certainty to U.S. growers, but now it has been undercut and risks destructive species invading and establishing themselves in the United States.

We support the re-establishment of the two-step inspection system as enshrined in the OWP. Any Mexican state that is unable to meet these criteria should have all imports of avocados from their processing and packing facilities banned. Given the possibility of evasion, if USDA cannot show in-field inspection in all plants in a state, that state should not be cleared. Additionally, U.S. and Mexico should negotiate how more diplomatic and physical security support can be provided to reestablish U.S. inspector presence.

SPS and technical considerations

The concerns about pest and disease pressures are not limited to U.S. avocado producers. Domestic producers of all types of fruits, vegetables, and tree nuts deserve greater assurances that their operations will not be unnecessarily exposed to harmful and invasive threats.

Conversely, for fresh produce exporters, foreign market access is more often hindered by sanitary-phytosanitary and technical barriers, rather than tariffs. USMCA's SPS chapter made improvements and provided more transparency related to import checks, certification processes, bilateral technical consultations, strong scientific justifications, and other provisions than were in place under NAFTA. We commend those changes and view them as worth supporting not only in North America but globally as well.

Customs clearance process

The flow of North American produce encompasses over 30 million metric tons every day, so it is vital that the cross-border logistics and paperwork be seamless, consistent, and adaptive to new innovations and consumer demands.

USMCA mandates that customs procedures must be consistent across all ports of entry within each country. It also included new provisions for transparency in import licensing and export licensing procedures, as well as maintaining a waiver of certain customs processing fees. WG views these as model examples of what we would look for from other countries, especially Japan, Taiwan, South Korea, and China.

³³ [“APHIS suspends inspections of avocados and mangoes in Michoacán following assault on U.S. government personnel”](#). Statement by U.S. Ambassador to Mexico Ken Salazar. Jun 18, 2024

³⁴ [“Mexico and the United States Agree that Personnel of the Ministry of Agriculture will Supervise Avocado Export Program Orchards”](#). Servicio Nacional de Sanidad, Inocuidad y Calidad Agroalimentaria (SENASICA). Sept 19, 2024

³⁵ [The Growing Threat to California Avocados: Why USDA Must Reinstate Inspection Protocols in Mexico](#). California Avocado Commission. May 2025

Conclusion

The trade partnership between the United States, Canada, and Mexico is highly valuable for U.S. farmers. At a time of unprecedented trade uncertainty in markets around the world, losing this agreement and the longstanding zero-tariff access for U.S. product into two of our top markets would be a severe blow to our members' livelihoods. WG strongly supports a renewed and improved USMCA to ensure our producers can continue to supply the best and most affordable fresh produce to consumers throughout North America. We look forward to working with you and President Trump on these and other priorities throughout the review process.

Sincerely,

A handwritten signature in black ink, appearing to read "D. Puglia". The signature is fluid and cursive, with a large initial "D" and a distinct "P" for the last name.

Dave Puglia
President & CEO