



November 3, 2025

The Honorable Jamieson Greer
United States Trade Representative
Office of the U.S. Trade Representative
600 17th Street NW
Washington, DC 20508

RE: Docket No. USTR–2025–0006 — Request for Comments on the Joint Review of the United States–Mexico–Canada Agreement (USMCA)

Dear Ambassador Greer:

The Organic Trade Association (OTA) appreciates the opportunity to submit comments as part of the joint review of the United States–Mexico–Canada Agreement (USMCA). The OTA is the leading membership-based business association for organic agriculture and products in the United States. Our members include growers, shippers, processors, certifiers, farmers' associations, distributors, importers, exporters, brands, retailers, material input providers, and others. OTA's mission is to grow and protect organic with a unifying voice that serves and engages its diverse members from farm to marketplace.

We value the USMCA as a cornerstone of North American economic integration and support efforts to strengthen its implementation but acknowledge needs for further refinements and improvements to ensure fair trade for American producers and processors.

1. Support for a Strong, Fair Trilateral Agreement

OTA supports the continuation of a robust trilateral trade framework that facilitates open markets, predictable rules, and growth opportunities across North America. A healthy regional agreement enhances competitiveness, innovation, and supply-chain resilience for U.S. organic producers and exporters and supports strong food and economic security for North America.

2. Ensure Rules-of-Origin Support Fair Regional Value Creation

While USMCA has strengthened agricultural trade, certain rules-of-origin provisions in practice allow goods made from non-regional agricultural inputs to receive preferential treatment after minimal processing within the region. This dynamic can displace U.S. production and investment, erode fair competition, and shift value-added processing away from American producers.

OTA urges USTR to review these origin provisions to ensure that preferential access under USMCA is reserved



for products that contribute meaningful North American content and production or are from products that are not commercially grown in North America. Closing these gaps would reinforce the intent of the Agreement in promoting regional supply chains within North America.

3. Sanitary and Phytosanitary (SPS) Measures

Enhanced cooperation on sanitary and phytosanitary (SPS) measures among the USMCA partners is essential to maintaining safe, science-based, and efficient trade in agricultural products. The OTA supports strengthened coordination on SPS policies and emergency response mechanisms but urges that these processes explicitly account for the unique implications for certified organic products. Treatments or interventions commonly applied under SPS protocols—such as fumigation, irradiation, or chemical disinfection—can end an organic product’s certified status. Therefore, SPS frameworks should include measures to identify, prevent, and mitigate these conflicts wherever feasible, ensuring that disease or pest-control responses do not unintentionally disrupt organic market access or undermine the integrity of organic trade within North America

4. Ensuring Technical Oversight of Organic Equivalency

OTA recommends that organic equivalency arrangements remain outside the core trade agreement text. Organic certification and equivalency determinations involve specialized technical oversight, including production practices, materials, labeling, and certification systems, enforcement across the entire agricultural, food and fiber sectors. These are best managed through dedicated bilateral mechanisms overseen by competent authorities. Maintaining this structure ensures that trade facilitation remains aligned with organic integrity, fair practices, consumer trust, and regulatory transparency.

The Organic Trade Association supports the continued modernization of USMCA to strengthen fair trade and regional cooperation while safeguarding the distinct technical and integrity systems that underpin organic trade. We appreciate the Office of the U.S. Trade Representative’s leadership and stakeholder engagement during this review process and stand ready to collaborate to ensure that North American organic trade remains competitive, transparent, and trusted.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Tom Chapman".

Tom Chapman
Co-CEO