INTERNATIONAL
FRESH
PRODUCE
ASSOCIATION℠

November 3, 2025

Docket Nos. USTR–2025–0004 and USTR– 2025–0005
Regarding the U.S.-Mexico-Canada Agreement (USMCA) Modernization Efforts
Comments of the International Fresh Produce Association (IFPA)

ATTN: Daniel Watson, Assistant U.S. Trade Representative for the Western Hemisphere, Office of the United States Trade Representative

The International Fresh Produce Association (IFPA) appreciates the opportunity to provide comments regarding the modernization of the United States-Mexico-Canada Agreement (USMCA). As the largest and most diverse association representing the fresh produce and floral supply chains, IFPA speaks on behalf of a worldwide industry that, in the United States, supports over two million jobs across the United States and contributes significantly to the health and economy of the United States[1].

All nations should encourage robust food production within their borders while also ensuring year-round access to a wide variety of healthy food choices. Regarding trade in food and agricultural products, IFPA recognizes that trade agreements evolve to reflect changing international dynamics, emerging technologies, and shifting economic priorities. Balancing these realities, IFPA supports the 2019 modernization of the North American trade agreement that ensures it continues to serve the interests of American workers, businesses, and consumers, while respecting the needs of our closest trading partners and neighboring nations.

Recognizing ongoing discussions around trade policy and the six-year review of USMCA, IFPA firmly believes that the existing provisions of USMCA must be upheld and that all provisions be more fully implemented, especially those that benefit the specialty crop sector and, by extension, American fresh produce and floral growers, businesses, and consumers. Any revisions to USMCA must strengthen the agreement's current advantages for the fair and effective movement of perishable fresh produce and florals across the continent. Since its implementation, USMCA has provided critical market access and stability for the fresh sector — supporting a highly integrated North American supply chain that is essential to delivering nutritious, high-quality, and diverse fruits, vegetables, and florals to consumers *year-round at affordable prices*.

As a truly trilateral agreement, USMCA's strength lies in its framework that promotes cooperation, innovation, and shared prosperity among the United States, Mexico, and Canada—recognizing that the fresh produce and floral supply chain relies on seamless integration and mutual commitment among all three countries. In 2024 alone, nearly $35 billion worth of fresh produce was traded between the U.S., Canada, and Mexico. Canada imported close to $5.5 billion in fresh produce from the United States, accounting for about half of its total

[1] https://www.freshproduce.com/siteassets/files/advocacy/fresh-produce-and-floral-economic-impact-study-report.pdf

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fresh produce imports. Canada also imported another $3 billion in fresh produce from Mexico. Canadian companies exported just over $4.5 billion in fresh produce to the United States, making up more than 97% of Canada's total fresh produce exports. The United States imported over 24 billion pounds of fresh produce from Mexico, valued at more than $19.6 billion, and exported more than $1.7 billion to Mexico. These numbers highlight the vital interconnectedness of our North American market and the importance of continental trade in perishable fresh produce for feeding consumers and supporting agricultural economies.

Since Canada and Mexico remain the top two export markets for U.S. fresh fruits and vegetables, maintaining strong trade ties within the region is essential to the supply chain, from the farm all the way to consumers who expect reliable, year-round access to affordable, high-quality produce. According to the International Food Policy Research Institute, improving availability and pricing has contributed to an 11% rise in per capita vegetable access in the U.S. since trade barriers have eased — a key step toward increasing consumption of nutritious foods and making Americans healthier.

Disruptions to North American trade flows—whether through the reintroduction of tariffs, new non-tariff barriers, or country-specific restrictions—would not only harm U.S. produce businesses; they would increase consumer costs, undermine long-standing cross-border relationships, and set back efforts to improve health outcomes by increasing fruit and vegetable consumption. Based on that concern, we urge negotiators to uphold and more fully execute the USMCA's core principles of market access, fair and transparent competition, science-based standards, regulatory harmonization, issue-focused working groups, and dispute-resolution mechanisms that have helped fresh produce businesses endure and even prosper under USMCA.

IFPA represents the vast diversity of fresh products and businesses across the supply chain in the U.S., Canada, and Mexico. Many of those organizations have unique perspectives on their specific needs for maintaining and improving fair trade across North America. For the fresh sector as a whole, IFPA is committed to working collaboratively with USTR, the Department of Commerce, and other government stakeholders to ensure that any modifications better promote innovation and balance competitiveness while safeguarding the hard-earned gains the specialty crop sector and consumers have realized under USMCA.

These written comments constitute IFPA's current, sector-wide perspective; we do not request inclusion in the public hearing. As the review of USMCA is considered, IFPA and our members will further engage with USTR and the parties to ensure the interests of the fresh produce and floral sector are represented.

Thank you for the Administration's leadership and continued support of agriculture and the fresh produce industry that feeds North America. Please direct comments and questions regarding IFPA's comment to Rebeckah Adcock, Vice President, U.S. Government Relations, radcock@freshproduce.com, (703) 501-9371 phone.

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