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May 15, 2026

Jeffrey Goettman
Deputy United States Trade Representative
Office of the United States Trade Representative
600 17th Street, N.W.
Washington, D.C. 20508

Re: Docket Number USTR-2026-0166, Comments by the U.S. Meat Export Federation Concerning the Modernization of the African Growth and Opportunity Act (AGOA)

The U.S. Meat Export Federation (USMEF) appreciates the opportunity to submit comments concerning the AGOA Modernization Review.

USMEF is a non-profit trade association that represents the export interests of the U.S. beef, pork and lamb industries through its network of offices and representatives in foreign markets. USMEF's membership includes a broad cross-section of American agriculture: farmers, meat packers, processors, purveyors and traders, agribusinesses with an interest in U.S. meat exports and other agricultural organizations.

USMEF works closely with USTR and with the United States Department of Agriculture (USDA) and is a long-standing partner of the USDA Foreign Agricultural Service through the Foreign Market Development Program and Market Access Program. The U.S. red meat industry plays a crucial role in the nation's agricultural industry. Exports are key to industry profitability, and the U.S. is a leading global exporter of red meat, with exports totaling nearly \$18 billion.

In recent years, AGOA benefits have mainly been suspended as part of a commendable effort to advance human rights, worker rights and political reforms. AGOA has not generally been utilized to leverage improved market access for U.S. agricultural exports, even though it was intended as a tool for facilitating two-way trade. In our comments, USMEF identifies examples of non-tariff trade barriers that limit the U.S. red meat industry's ability to expand exports to Africa. Many AGOA-eligible countries also impose high tariffs on imports of red meat. Priority market access issues are as follows:

South Africa

Market access barriers in South Africa include:

- Lack of access for pork offal (including hearts, a key opportunity product for the market).
- Not allowing U.S. beef that has transited any other country prior to landing in South Africa.
- Lack of clarity regarding the lymph node removal requirement for pork products.
- A limited list of U.S. pork muscle cuts that are eligible to be exported for sale to those not needing to be on an approved processor list (i.e., unrestricted access) and an unclear process to get additional cuts added.
- A zero tolerance requirement for *Salmonella* spp. for imported red meat products.
- No access for processed meat products.
- High tariffs on imported beef, in excess of 30%.

The U.S. industry would benefit from South Africa reducing tariffs and lifting its remaining restrictions on U.S. beef, and the numerous barriers for U.S. pork are particularly frustrating. The European Union is the largest pork supplier to South Africa and historically low European production should offer opportunities for U.S. pork, if restrictions are lifted. South Africa imported \$71 million in pork and pork variety meats in 2025, \$46 million of which was from the EU.

During the renewal of the AGOA in 2016, South Africa agreed to partially lift its ban on U.S. pork. However, South Africa has continued to impose unscientific trade barriers. South Africa unjustifiably restricts pork imports due to porcine reproductive and respiratory syndrome (PRRS) by mandating that raw pork from PRRS-positive countries, including the United States, must undergo extensive risk-mitigation processing, including removing lymph nodes. There is no documented case of PRRS transmission through commercially traded frozen pork. Furthermore, the World Organization for Animal Health's (WOAH) Terrestrial Code (Chapter 15.3) describes pork products as safe to trade without any PRRS-related restrictions regardless of the PRRS status of the [exporting country](#), [zone](#) or [compartment](#). South Africa should adopt science and risk-based requirements in line with its WTO commitments.

South Africa is not meeting its obligations under Section 104 of AGOA. USMEF contends that AGOA could remain a useful tool to positively influence South Africa's movement toward removing unscientific trade barriers in meat products. However, there must be negative repercussions for continued failure to do so.

Nigeria

All fresh (non-processed) U.S. red meat is currently ineligible for the Nigerian market. Current access only allows for a narrow scope of U.S. processed red meat products to be exported to Nigeria – where the enormous economy holds excellent growth potential for U.S. red meat exports. USMEF estimates market value potential of up to \$130 million in beef exports and \$12 million in pork exports if all market access barriers are removed. Nigeria should eliminate its ban on the importation of raw meat products and USTR should consider suspending or sanctioning Nigeria's AGOA benefits until this ban is lifted.

Angola

Angola has traditionally been one of the main African destinations for U.S. red meat, but Angola's import license-related ban on certain beef offal, and inconsistent issuance of import permits for beef livers and pork offal, are limiting opportunities for U.S. exporters. To obtain an import license, importers must often prove they have first attempted to source pork from local Angolan producers. This "local content" requirement acts as a major deterrent for high-volume U.S. exporters. The United States should require Angola to eliminate its protectionist import licensing regime for red meat in order to maintain current AGOA benefits.

Namibia

Namibia currently prohibits imports of all U.S. red meat and there is no industry knowledge of what prompted this longstanding ban. Additionally, Namibia stopped issuing transit permits, and transit through Namibia is especially important for trade to the Democratic Republic of Congo.

Kenya

While Kenya is technically open to U.S. red meat, exports to Kenya are minimal due to several trade barriers. Non-tariff barriers include Kenya's burdensome import license system, restrictions on transshipment of products, a lack of clarity on import veterinary drug residue and microbiological standards. Potential for U.S. pork exports to Kenya exists, particularly for hearts and livers. Unfortunately, Kenya effectively bans U.S. pork by maintaining a requirement for a Letter of Non-Compete, which requires the approval of domestic industry for each and every shipment of imported pork.

Kenya's import duties on beef and pork products are also trade-prohibitive and must be addressed if U.S. red meat is to have meaningful opportunities in the market

Other AGOA-Eligible Countries

Outside of South Africa, minimal information on importing countries' requirements is available to U.S. exporters. This is primarily due to the lack of bilateral discussions between the U.S. and the respective African government agencies, and it leaves exporters in a vulnerable position to navigate exports to this region with minimal local USDA expertise to reference.

Especially given the challenges facing U.S. red meat in the China market, market access improvements in Africa are sorely needed to help the U.S. industry further diversify its international customers. This is particularly the case for pork variety meats, where alternative markets outside of China are extremely limited. EU pork variety meat exports to Africa in 2025 totaled 214,232 metric tons valued at \$174 million, with the main destinations being Cote d'Ivoire, Congo, Democratic Republic of Congo, Liberia, Ghana, Angola and South Africa. U.S. pork variety meat exports to the region were essentially zero.

USMEF sees AGOA as an important tool to ensure adherence to WTO standards and internationally accepted guidelines on SPS matters. Unfortunately, there remains much room for growth in assuring that AGOA can be utilized as a positive reinforcement mechanism to that end. There is great potential for U.S. red meat trade on the African continent. USMEF will continue to utilize its resources to the greatest extent possible to achieve that potential, for the benefit of U.S. farmers and ranchers, as well as red meat processors, exporters and traders.

USMEF appreciates the opportunity to raise these issues and respectfully urges USTR to make elimination of market access barriers for U.S. agricultural exports a cornerstone in the effort to modernize AGOA.

Sincerely,



Dan V. Halstrom
President and CEO
U.S. Meat Export Federation