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World Headquarters:
1660 Lincoln Street
Suite 2800
Denver, CO 80264
303-623-MEAT (6328)
Fax: 303-623-0297
www.USMEF.org

Ambassador Jamieson Greer
U.S. Trade Representative
Office of the United States Trade Representative
600 17th Street, N.W.
Washington, D.C. 20508

June 30, 2025

Re: Docket Number USTR-2025-0012, Comments by the U.S. Meat Export Federation Concerning the Annual Review of Country Eligibility for Benefits Under the African Growth and Opportunity Act (AGOA) for Calendar Year 2026

The U.S. Meat Export Federation (USMEF) appreciates the opportunity to submit comments concerning the 2026 AGOA Eligibility Review. USMEF's comments will focus primarily on market access barriers for U.S. red meat in South Africa, Nigeria, Namibia and Kenya.

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 $19.1 billion in 2024, the second largest on record.

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 shoulder cuts.
- 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 $67 million in pork and pork variety meats in 2024, $45 million of which was from the EU.

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.

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 a number of 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. The degree to which U.S. pork and pork products are eligible for Kenya is also unclear.

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. For example, Angola has traditionally been one of the main markets for U.S. beef exports to the continent. However, opportunities are currently limited by Angola's import license-related ban on certain beef offal and its limited issuance of import permits for beef livers.

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 January-April 2025 totaled 70,600 metric tons, 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 appreciates the opportunity to raise these issues and respectfully urges USTR to consider market access barriers when evaluating eligibility for AGOA benefits.

Sincerely,

Dan V. Halstrom

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