Meat Institute

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Sustaining Tomorrow

May 15, 2026

Ambassador Jeffrey Goettman
Deputy United States Trade Representative
Office of the U.S. Trade Representative
600 17th St NW
Washington, DC 20508

Docket Number USTR-2026-0166: Request for Comments on the Modernization of the African Growth and Opportunity Act (AGOA); 91 *Fed. Reg.* 23142; (April 29, 2026).

Dear Ambassador Goettman,

The Meat Institute appreciates the opportunity to submit comments to the Office of the U.S. Trade Representative (USTR) in response to Docket Number USTR-2026-0166, "Request for Comments on the Modernization of the African Growth and Opportunity Act (AGOA)."

The Meat Institute is the United States' oldest and largest trade association representing packers and processors of beef, pork, lamb, veal, turkey, and processed meat products, and Meat Institute member companies account for more than 95% of U.S. output of these products. The Meat Institute provides legislative, regulatory, international affairs, public relations, technical, scientific, and educational services to the meat and poultry packing and processing industry.

The U.S. meat and poultry industry is the economic engine powering the agriculture sector. According to a 2025 study commissioned by the Meat Institute, the meat and poultry processing industry contributes $57.3 billion in value added, nearly 584,000 jobs, $40.6 billion in labor income, $311.0 billion in total sales (output), and $12.5 billion in local, state, and federal taxes to the national economy.[1] With growing domestic and international demand for nutritious sources of protein and other essential nutrients, the meat and poultry processing industry will continue to support the growth and well-being of the United States.

Through indirect and induced effects, the meat and poultry processing industry generates significant economic activity in other industries, including livestock and poultry production, animal feed manufacturing, grain and oilseed production, truck and rail transportation, equipment manufacturing, and other sectors. When these indirect and induced effects are incorporated into the analysis, the total economic contribution of the U.S. meat and poultry processing industry is $347.7 billion in value added, more than 3.2 million jobs, $205.3 billion in labor income, $911.7 billion in total sales (output), and $77.0 billion in local, state, and federal taxes.[2]

[1] "Economic Contribution of the Meat and Poultry Processing Industry," Decision Innovation Solutions, accessed May 12, 2026, https://www.meatinstitute.org/sites/default/files/documents/Economic%20Contribution%20of%20the%20Meat%20and%20Poultry%20Processing%20Industry.pdf.
[2] Ibid.

International trade is vital to the long-term strength of the U.S. meat and poultry industry, the American workers it employs, and the rural and farm communities it sustains. The domestic U.S. meat and poultry industry's long-term economic viability depends on robust international trade, particularly as domestic per capita consumption of meat and poultry grows modestly, and 95% of the world's consumers live outside the United States.[3] In 2025, U.S. meat and poultry exports exceeded $23.3 billion.[4] The United States exports approximately 14% of all beef produced domestically, 15% of all poultry produced domestically, and 25% of all pork produced domestically on an annual basis. Based on USDA Economic Research Service's Agricultural Trade Multipliers, U.S. meat and poultry exports contribute additional export activity of more than $44 billion with U.S. red meat exports supporting more than 8,800 jobs for every $1 billion in export value and U.S. poultry exports supporting more than 6,200 jobs for every $1 billion in export value.[5]

Exports add value to every animal produced in the United States and, in turn, increase demand for U.S. corn and soybeans. In 2024, U.S. beef exports yielded more than $400 in value per head of cattle and U.S. pork exports contributed $64 in value for each hog marketed. The resilience of the U.S. meat and poultry industry and the American workers it employs is inextricably linked to U.S. trade policy and attendant initiatives that foster U.S. meat and poultry exports. However, the industry's export potential remains limited by unjustified sanitary barriers, prohibitive tariffs and tariff rate quotas, and onerous registration and approval requirements for exporting facilities, among other impediments.

The Trump Administration's America First Trade Policy Agenda has reinvigorated American trade policy and demonstrated the importance of proactively addressing unfounded barriers that curtail U.S. meat and poultry export potential and harm America's farmers, ranchers, and workers responsible for producing the world's most nutritious, abundant, and efficient food supply. Expanding access for U.S. meat and poultry products in sub-Saharan Africa today could ensure U.S. producers and exporters have access to one of the world's largest markets in the coming decades, and it is for this reason that the Meat Institute supports the modernization of the African Growth and Opportunity Act (AGOA).

As House Ways and Means Committee Chairman Jason Smith (R-MO) noted in the Committee's 2026 Trade Policy Agenda, a long-term reauthorization of AGOA that advances America's strategic interests in the region is an "absolute must" for many U.S. industries, including the meat and poultry processing sector. With this goal in mind, the Meat Institute submits these comments to highlight opportunities to reform AGOA to align the pact with national priorities and prioritize duty-free access for trading partners who reduce tariff and non-tariff barriers for U.S. exports.

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[3] "Per capita availability of red meat and poultry projected higher in 2025 and 2026," Economic Research Service, USDA, accessed April 29, 2026, https://ers.usda.gov/data-products/charts-of-note/chart-detail?chartId=113119.
[4] "GATS Home," Foreign Agricultural Service, USDA, accessed April 29, 2026, https://apps.fas.usda.gov/gats/default.aspx.
[5] "Agricultural Trade Multipliers," Economic Research Service, USDA, updated July 2, 2025, https://www.ers.usda.gov/data-products/agricultural-trade-multipliers.

Status Quo Has Yielded Modest Improvements in U.S. Market Access

AGOA has been a cornerstone of U.S. economic policy toward sub-Saharan Africa and successfully transitioned the American posture in the region from one of development assistance and emergency aid towards strategic negotiation and partnership. The endurance of AGOA is a testament to U.S. commitment to sub-Saharan Africa.

In spite of this, AGOA has not yielded substantial benefits for U.S. agricultural exports in line with the stipulation of 19 USC § 3703 that sub-Saharan African countries eligible for beneficial treatment under AGOA must establish or demonstrate continual progress towards establishing the elimination of barriers to U.S. trade and investment. As noted in the *Federal Register* notice, sub-Saharan Africa's share of total U.S. goods imports has remained low since AGOA went into effect in 2000. Growth in U.S.-Africa goods trade has persistently lagged behind trade with all other continents and Africa's share of total U.S. trade has fallen since AGOA went into effect in 2000.[6]

AGOA's benefits for trading partners have also accrued unevenly. Between 2014 and 2021, more than three-quarters of non-crude petroleum imports under AGOA originated from just five sub-Saharan African countries: South Africa, Kenya, Lesotho, Madagascar, and Ethiopia.[7] Moreover, some of the same AGOA partners who have benefitted the most from duty-free treatment for eligible products have erected the most pernicious barriers to U.S. meat and poultry products.

Poultry and Poultry Products

Sub-Saharan Africa is the top global destination for poultry meat, and U.S. poultry exporters are primed to provide this market with wholesome, nutritious American poultry.[8] Despite the promise the sub-Saharan African market holds for U.S. exporters and the obvious need for affordable poultry products, several AGOA beneficiaries have chosen to shelter their inefficient, inadequate domestic production systems from global competitors. South Africa's treatment of U.S. poultry products epitomizes how status quo under AGOA fails to adequately protect the interests of local consumers or U.S. exporters by prioritizing the needs of protectionist domestic constituencies.

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[6] "What's Next for AGOA?," Center for Strategic & International Studies, accessed April 29, 2026, https://www.csis.org/analysis/whats-next-agoa.

[7] "African Growth and Opportunity Act (AGOA): Program Usage, Trends, and Sectoral Highlights," United States International Trade Commission, accessed April 29, 2026, https://www.usitc.gov/publications/332/pub5419.pdf.

[8] "Market Opportunities Expanding for Agricultural Trade and Investment in Africa," *Amber Waves*, accessed May 3, 2026, https://www.ers.usda.gov/amber-waves/2023/february/market-opportunities-expanding-for-agricultural-trade-and-investment-in-africa.

In the early 2000s, South Africa imposed anti-dumping duties on American chicken leg quarters, severely hampering U.S. export potential. After direct advocacy from Congress and industry in 2015, the United States accepted an annual tariff rate quota for bone-in chicken and for a period, South Africa remained one of the top AGOA markets for U.S. poultry exports.

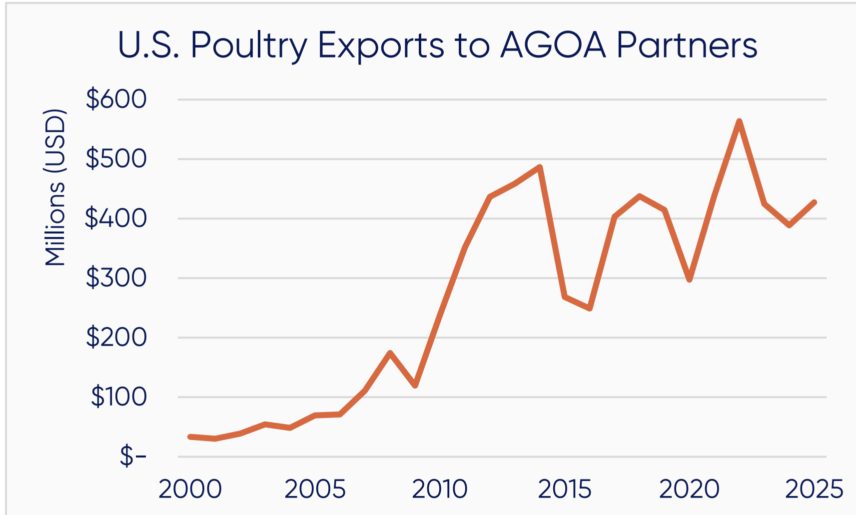

Figure 1: In 2025, more than 56% of all U.S. poultry exports to AGOA-eligible nations went to just two trading partners: Angola and Ghana. The Republic of Congo, Mauritania, and Benin round out the top five markets for U.S. poultry.

In the ensuing years, South African authorities have since utilized state-level HPAI restrictions to stymie U.S. exports. In March 2025, the South African Department of Agriculture reached an agreement with USDA that would authorize USDA to self-restrict and self-restart poultry exports as states address local HPAI outbreaks, a commonly accepted practice for U.S. trading partners. [9] The Meat Institute thanks the Trump Administration and career government officials for their work in securing this agreement on behalf of U.S. exporters.

South Africa has compounded challenges for U.S. poultry exporters by raising the MFN rate for bone-in and boneless chicken in 2020, adversely affecting the American industry while European producers benefit from duty-free access under the SADC-EU Economic Partnership Agreement. Since the MFN rate increase went into effect, U.S. exports of bone-in chicken meat to South Africa have fallen by 80 percent.

While South Africa's blatant disregard for removing its barriers to U.S. trade and investment is the most egregious conduct by an AGOA beneficiary, other countries have used similar tactics to limit U.S. agricultural exports. Nigeria has maintained a ban on imports of fresh poultry since 2002. While the Nigerian government alleges that this prohibition is meant to prevent the spread of animal diseases, Nigeria applies the ban to all products from all countries, flouting global standards on risk- and science-based trade.[10] An opaque regulatory process and ill-equipped ports further challenge market access to the detriment of local consumers and U.S. exporters.

[9] "Poultry and Products Annual," USDA-FAS, accessed April 30, 2026, https://apps.fas.usda.gov/newgainapi/api/Report/DownloadReportByFileName?fileName=Poultry%20and%20Products%20Annual_Pretoria_South%20Africa%20-%20Republic%20of_SF2025-0026.

[10] "A Review of Nigeria's Tariff and Non-Tariff Barriers to U.S. Agricultural Exports," USDA-FAS, accessed April 30, 2026, https://apps.fas.usda.gov/newgainapi/api/Report/DownloadReportByFileName?fileName=A%20Review%20of%20Nigeria%27s%20Tariff%20and%20Non-Tariff%20Barriers%20to%20US%20Agricultural%20Exports_Lagos_Nigeria_NI2025-0022.

In 2025, Angola announced the suspension of import licenses for a variety of animal products, but only following interventions from the U.S. Government was issuance of import licenses for chicken leg quarters and whole chickens resumed.[11] Other poultry products like drumsticks, wings, and breasts, continue to be denied import permits.

In Côte d'Ivoire, poultry exports frequently face a cumulative *ad valorem* tariff rate in excess of 100 percent as Côte d'Ivoire applies a fee on top of the Economic Community of West African States' Common External Tariff.[12] Ghana has limited the issuance of import permits for poultry and poultry products since 2014 and prohibits the importation of poultry with a fat content by weight in excess of 15 percent.[13]

Red Meat and Red Meat Products

While poultry meat and poultry meat products are widely expected to remain the dominant meat and poultry export to sub-Saharan Africa in the near term, U.S. red meat exports are similarly hampered by unfair trading practices. South Africa maintains a 40% tariff rate on imported beef. South Africa does not permit the entry of U.S. beef that has transited any other country prior to landing.

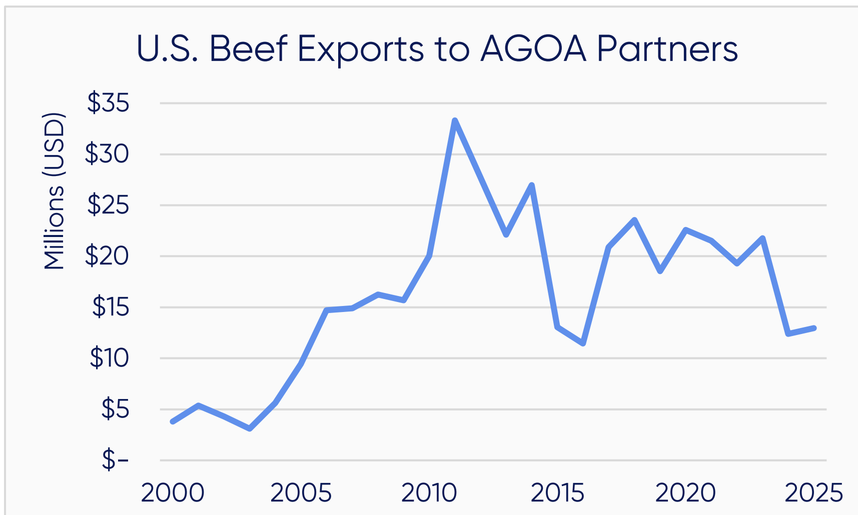

Figure 2: U.S. beef exports are predominantly variety meat shipments to a small handful of countries: Côte d'Ivoire, Gabon, and South Africa.

Nigeria currently blocks all fresh, non-processed U.S. red meat products from entering the market. A 35% tariff rate on most red meat products would remain a point of frustration even if Nigeria were to open its market.

Namibia maintains prohibitions on the import of all U.S. red meat despite receiving access to the U.S. beef market in 2020. Namibia has also stopped issuing transit permits, threatening U.S. exports to the Democratic Republic of Congo.

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[11] 2026 National Trade Estimate Report on Foreign Trade Barriers of the President of the United States on the Trade Agreements Program, USTR, accessed May 4, 2026, https://ustr.gov/sites/default/files/files/Press/Releases/2026/National%20Trade%20Estimate%20Report%202026.pdf.
[12] Ibid.
[13] Ibid.

Although Kenya is technically open to U.S. red meat exports, several non-tariff barriers including an import license system and restrictions on transshipment frustrate attempts by U.S. exporters and local importers to service this market. In 2022, East African Community nations increased minimum tariff rates for meat products to 35%.

Ghana prohibits the importation of beef, pork, and mutton with a fat content by weight in excess of 25 percent.[14]

South Africa prohibits the importation of pork offal, including pork hearts, ostensibly on the grounds of preventing the spread of Porcine Reproductive and Respiratory Syndrome (PRRS) despite the lack of any known cases of transmission to livestock through imported pork. South Africa has also provided insufficient guidance on its requirement for lymph node removal for pork shoulder cuts. In general, South Africa maintains non-science-based barriers to U.S. pork exports and provides zero access for processed pork products.

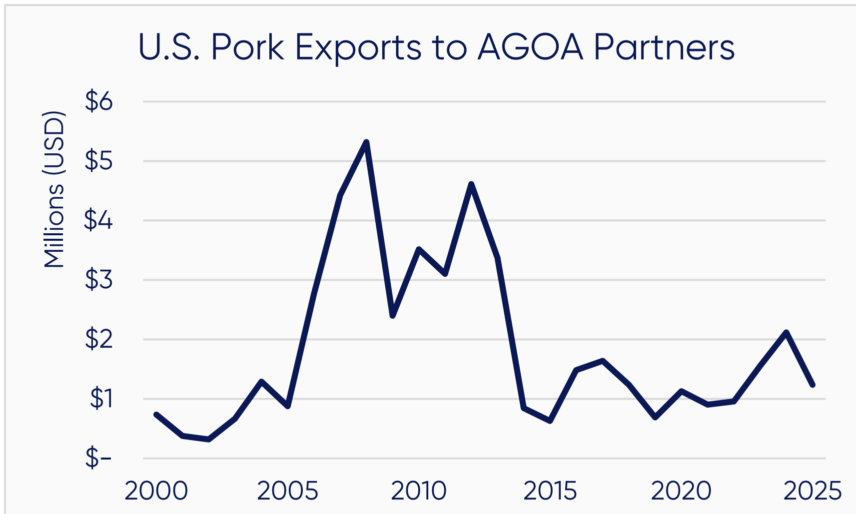

Figure 3: While sub-Saharan Africa is a small market for U.S. pork today, targeted reforms could open more of the market to variety meats and offal.

The European Union is historically the largest supplier of pork to South Africa and with European production on a multi-year decline, U.S. pork exporters would be well-positioned to take advantage of the opportunity if not for persistent tariff and non-tariff barriers. Relative to other meat and poultry products, South Africa maintains a "modest" 15% tariff rate on pork imports with a 0% tariff rate for pork ribs and some offal products.

While Nigeria began allowing pork sausage imports from the United States in recent years, the country otherwise maintains a ban on all fresh, non-processed U.S. red meat products in violation of obligations under international treaties.

[14] Ibid.

Targeted Reforms Can Open Markets and Preserve Benefits

Targeted AGOA reforms can strengthen the global position of U.S. agricultural exporters while aligning the program with the 2025 National Security Strategy, which called for a "transition from an aid-focused relationship with Africa to a trade- and investment-focused relationship, favoring partnerships with capable, reliable states committed to opening their markets to U.S. goods and services."[15]

While the previous section made note of numerous unfair trade practices employed by AGOA-eligible nations, disengagement from the region is undesirable as the nations of Africa possess tremendous economic potential with a young, growing population and strong GDP growth likely over the coming decades. Coupled with Africa's role in ensuring U.S. national security and economic prosperity, it is essential to use this opportunity to rejuvenate U.S. trade flows with Africa. By using the annual consultative forum to monitor progress and document setbacks, USTR and Congress can work with industry and civil society to unlock the mutual benefits of robust trade.

The Meat Institute offers the following comments on how a modernized AGOA can be mutually beneficial for America's farmers, workers, and businesses and the vibrant industries of AGOA-eligible nations.

- Develop a standard toolkit of market liberalizing reforms modeled off the recent Agreements on Reciprocal Trade that AGOA nations can implement to demonstrate their intent to eliminate barriers on U.S. trade and investment.
    - In the confines of meat and poultry trade, this toolkit may include:
        - Protecting common meat terms,
        - Adopting a systems-based approach to facility registration by listing all federally approved U.S. meat and poultry establishments as eligible to export,
        - Streamlining relevant certification processes,
        - Securing regionalization commitments to mitigate trade disruptions associated with foreign animal diseases,
        - Reducing or removing tariffs on U.S. meat and poultry products,
        - Eliminating onerous product registration and import licensing requirements, and
        - Adopting science-based maximum residue level commitments.
- Require AGOA beneficiaries to opt-in to preferential treatment and periodically renew access through demonstrated progress towards trade liberalization and other reforms.
    - As a non-reciprocal trade preference program, the President of the United States annually reviews and determines program eligibility for each nation. By requiring beneficiary nations to opt-in to preferential treatment, a modernized AGOA can align the interests of the United States with eligible nations, reinforce the reciprocal benefits of trade, and signal long-term eligibility to industry and civil society.

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[15] "National Security Strategy of the United States of America," The White House, accessed April 29, 2026, https://www.whitehouse.gov/wp-content/uploads/2025/12/2025-National-Security-Strategy.pdf.

- Utilize the Development Finance Corporation (DFC) to strengthen financial and commercial ties with sub-Saharan Africa. The early returns on the Lobito Corridor projects, where DFC participation was critical in securing necessary investment, demonstrate that targeted infrastructure investments can facilitate two-way trade and support U.S. export growth in sub-Saharan Africa.
- Where the parameters of AGOA are insufficient to induce necessary market reforms, utilize agreements on reciprocal trade with individual nations or clusters of nations to overcome common points of frustration for U.S. exporters.
  - The 2019 launch of the African Continental Free Trade Agreement (AfCFTA) could serve as the basis for more robust negotiations with binding provisions.

The Meat Institute appreciates the opportunity to submit these comments and supports the Trump Administration's efforts to align AGOA with U.S. strategic interests in the region. We stand ready to work with USTR and the Trump Administration to find opportunities to secure preferential market access for U.S. meat and poultry products and promote American agriculture and manufacturing exports in sub-Saharan Africa.

Respectfully submitted,

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