FLORIDA FRUIT
& VEGETABLE ASSOCIATION

November 3, 2025

Mr. Daniel Watson
Assistant United States Trade Representative
for the Western Hemisphere
Office of the United States Trade Representative
600 17th Street, NW
Washington, DC 20508

RE: Written Comments on the Operation of the Agreement Between the United States, Mexico, and Canada; Docket No. USTR-2025-0004

Dear Mr. Watson:

These written comments are being submitted by the Florida Fruit & Vegetable Association ("FFVA") in response to the *Federal Register* notice of September 17, 2025, requesting public comments on the operation of the Agreement between the United States, Mexico, and Canada ("USMCA" or "the Agreement") in advance of the USMCA Joint Review (Docket No. USTR-2025-0004). In accordance with the *Federal Register* notice, FFVA is separately submitting a request to appear at USTR's November 17, 2025, public hearing on the operation of USMCA (Docket No. USTR-2025-0005).

FFVA is Florida's leading full-service organization dedicated to safeguarding a competitive environment for fruits, vegetables, and other specialty crops grown in Florida. It has served Florida's grower-shipper community since 1943.

Florida's agricultural industry plays an indispensable role in feeding the nation during its fall through late spring marketing period, when most other U.S. produce growers have yet to begin their harvest. Florida is first in the nation by value in the production of numerous perishable products, including watermelons and sweet corn. It is second in the nation by value in the production of strawberries, bell peppers, and tomatoes grown in the open field. During the late fall to spring months, South Florida growers supply fresh produce to more than 150 million people, primarily in the Eastern U.S., effectively making Florida the winter fruit and vegetable capital of the nation.

As further described below, because Florida and Mexican produce growers share the same production and marketing period, the Florida industry, since the early 2000s, has had to compete in the U.S. market with unfairly priced, skyrocketing imports of Mexican seasonal and perishable fruits and vegetables. Over that period, in large part due to extensive financial benefits provided by the Mexican Government to its fruit and vegetable producers, the Mexican produce industry has enjoyed exponential production growth and export gains in the U.S. market. Its surging produce shipments to the U.S. market have had crippling effects on the produce growers in Florida and throughout the Southeast and are now threatening the viability of the Florida produce industry. To help safeguard the Florida industry, FFVA urges the U.S. Government to incorporate into USMCA effective, product-specific tariff rate quotas ("TRQs") governing fruit and vegetable imports during Florida's fall-spring marketing period.

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I. Since the early 2000s, the Mexican Government has Provided Significant, Targeted Benefits to its Fruit and Vegetable Sector to Create an Export-Oriented "Protected" Agricultural Industry

Over the past two decades, the Mexican Government has provided hundreds of millions of dollars or more in subsidies for the development and operation of a multibillion-dollar, export-oriented "protected" agricultural industry. Its financial support to its protected agricultural sector has included extensive investments in greenhouses, shade houses, macro tunnels, irrigation systems, land drainage, packing houses, refrigerated transport, and other activities and infrastructure throughout its export supply chain. The heaviest concentration of that Government's targeted support was provided from 2009 to 2020, but certain forms of assistance are still being granted. These enormous and still ongoing benefits to Mexico's produce sector have succeeded in transforming that sector into a Mexican fruit and vegetable exporting powerhouse that now dominates the U.S. market.

Adding to these advantages are Mexico's low wage rates, which average approximately $1.59 per hour.[1] In contrast, Florida's Adverse Effect Wage Rate this year is $16.23 per hour, and FFVA members regularly report that H-2A hand harvesters effectively earn $25 or more an hour when the costs of housing, meals, transportation, and wages are considered together. While growers continue to improve efficiencies and invest in mechanical and automated solutions, fruit and vegetable production is labor intensive due to the diverse production and harvesting practices needed to produce different crops. Florida's specialty crop growers regularly report that labor costs represent as much as 40-50% of all input costs.

As intended by the Mexican Government, its vast investments in the country's produce sector, in combination with the Government's policy of low labor wage rates, have driven extraordinary growth in Mexico's fruit and vegetable production.

As discussed further below, consistent with the intention of the Mexican Government, nearly all of Mexico's fruit and vegetable production has been exported to the U.S. market. In fact, a USDA Economic Research Service report from September 2025 confirms that the U.S. is the destination for about 90% of Mexico's horticultural exports.[2] As described further below, these booming imports from Mexico have led to devastating consequences for the Florida industry.

In 2022, most of Florida's Congressional Delegation petitioned USTR under the authority of Sec. 301 of the Trade Act, as amended, requesting that USTR investigate the Mexican Government's decades-long export targeting of its protected agricultural sectors and provide import relief to the Florida producers. USTR responded by establishing a private-sector advisory committee to make recommendations to USTR and USDA on the measures needed to overcome the trade concerns raised in the petition. FFVA opposed that advisory committee because it included importing interests, and for other reasons, and continues to believe that concrete border measures, rather than an advisory committee, are urgently needed to provide import relief to Florida growers.

FFVA notes that USTR pledged in its response to the Sec. 301 petition "to continue to work with the Florida petitioners and producers" to "consider any further actions that may be appropriate." FFVA

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[1] Alexandra E. Hill and James E. Sayre, 2024, "As Mexican Farmworkers Flock North, Will U.S. Farms Head South?" ARE Update 28(1): 9–12, University of California Giannini Foundation of Agricultural Economics.

[2] *U.S. Horticultural Imports from Mexico: 14 Years of Expansion for 2007–09 to 2021–23 , EB-48, USDA, Economic Research Service, September 2025.*

welcomes USTR's ongoing commitment to the industry and believes the measures described below are an appropriate, critically needed way to follow through on that commitment.

II. Skyrocketing, Unfairly Priced Fruit and Vegetable Imports from Mexico have Caused Devastating Harm to Florida Produce Growers and are Putting the Florida Industry's Survival at Risk

The Trump Administration has recently acknowledged that America's growing reliance on imports of fruits and other foods essential to feeding our nation is compromising our nation's food security and national security interests. USDA Secretary Brooke Rollins framed the Administration's concerns as follows:

> *I think it's biblical. We've got to produce food for our own selves. The President has talked significantly about the importance of onshoring our manufacturing. We also have to onshore our food. We have over the last decade or so begun to import more than we export. We've got to get back to the point where we can feed ourselves and not only feed ourselves but feed ourselves in a way that's healthy using locally produced food. . . . We've got to reshore our food. We can't rely on China, Russia, or South America for our fruit, for our meat, etc.*

Mexico's surging shipments of fruits and vegetables to the U.S. market over the last two decades offer some of the most striking examples of how reliant the United States has become on offshore fruits and vegetables. The injury those shipments have inflicted on Florida production tells an equally striking story about how our country's growing import reliance is compromising the viability of U.S. production.

The adverse impacts to Florida agricultural production due to Mexican fresh fruit and vegetable exports have been widely documented. In line with numerous other prior studies, an October 2025 report by the Florida Department of Agriculture and Consumer Services confirmed that "Florida producers continue to suffer disproportionate economic injury."[3] From 2004 to 2024, Florida's U.S. domestic share of the market decreased by nearly 48% while Mexico's increased by more than 200%. The report further showed the following:

- Annually, **Florida agricultural producers lost sales estimated at 10-20% or $570 million - $1.14 billion in total economic losses** due to Mexico's ag-export expansion.
- **Between 7,000 and 14,000 Florida jobs were lost** based on the $570 million - $1.14 billion in total economic losses annually for Florida's economy.
- Between 2003 and 2023, there was a **557% increase in the value of specialty crop imports from Mexico**.

What's more, Florida's market share declined in five of the six primary commodities examined between 2004 and 2024, including for bell peppers, tomatoes (rounds), blueberries, cucumbers, and squash. Yet, in all six primary commodities, Mexico saw an increase in market share.

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[3] *Impact of Mexico's Ag-Exports on Florida Agriculture, Florida Department of Agriculture and Consumer Service, October 2025.*

- Bell Peppers: **Florida lost 73.4% market share** between 2004 and 2024**. Mexico gained a 110.4% market share** during that same time. The change in total U.S. supply between 2004 and 2024 was 580 million pounds, an expansion of 52.0%.
- Tomatoes, Rounds: **Florida lost 54.4% market share** between 2004 and 2024. **Mexico gained a 74.7% market share** during that same time. The change in total U.S. supply between 2004 and 2024 was 800 million pounds, a decline of 30.9%.
- Strawberries: **Florida gained 29.0% market share** between 2004 and 2024. **Mexico gained a 169.1% market share** during that same time. The change in total U.S. supply between 2004 and 2024 was 698 million pounds, an expansion of 132.3%.
- Blueberries: **Florida lost 52.0% of its market share** between 2014 and 2024. **Mexico gained a 361.8% market share** during that same time. The change in total U.S. supply between 2014 and 2024 was 137 million pounds, an expansion of 120.6%.
- Cucumbers: **Florida lost 74.3% market share** between 2004 and 2024. **Mexico gained a 28.5% market share** during that same time. The change in total U.S. supply between 2004 and 2024 was 1.18 billion pounds, an expansion of 111%.
- Squash: **Florida lost 26.3% market share** between 2004 and 2024. **Mexico gained a 3.6% market share** during that same time. The change in total U.S. supply between 2004 and 2024 was 25.8 million pounds, an expansion of 5.1%.

III. To Prevent Further Import Injury to Florida's Produce Growers, FFVA asks the U.S. Government to Incorporate into USMCA Effective, Product-Specific TRQs Governing Fruit and Vegetable Imports During the Florida Industry's Fall-Spring Marketing Season

In order to protect the fruit and vegetable sectors in Florida that are most at risk due to imports, FFVA asks the U.S. Government to impose product-specific seasonal fruit and vegetable TRQs on imports during Florida's marketing season. The Florida strawberry, blueberry, bell pepper, squash, cucumber, watermelon, sweet corn, and lettuce sectors, among others, are in urgent need of TRQ relief.

FFVA notes that because certain Florida sectors (blueberries, watermelons, and others) face modest import competition from certain Central and South America origins during portions of Florida's marketing season, the most effective TRQs may be ones imposed under the authority of Sec. 232 of the Trade Expansion Act of 1962. TRQs applicable to all fruit and vegetable imports, rather than to Mexican fruits and vegetables standing alone, would avoid the situation where foreign suppliers not covered by the TRQs would attempt to seize any market share lost by the Mexican industry, which could dilute the effectiveness of the TRQs.

The use of Sec. 232 authority to establish effective seasonal TRQs governing fruit and vegetable imports is appropriate and justified to safeguard the U.S. production of these goods during the fall-spring months of the year. Because fruits and vegetables are such an essential component of our nation's diet, if the import and injury trends above are allowed to continue unchecked, this will threaten our country's ability to continue feeding itself with crucial U.S.-grown food during a substantial portion of the year. As the Administration has repeatedly confirmed, threats to our country's food supply undermine our national security interests.

At a minimum, because imports of Mexican fruits and vegetables are by far the dominant force in the U.S. market during Florida's marketing season, the U.S. Government should establish effective seasonal

TRQs on targeted fruits and vegetables from Mexico. The USMCA Joint Review and other USMCA provisions governing the continued application of USMCA provide the U.S. Government with the opportunity and latitude needed to implement TRQs of this nature. As noted above, the implementation of these TRQs would also honor USTR's 2022 Sec. 301 pledge to continue working with the Florida producers on effective trade measures to redress the Florida industry's import concerns.

FFVA stands ready to help the U.S. Government develop the structural and administrative elements of these seasonal TRQs in a way that ensures they effectively control fruit and vegetable imports from all origins or, at a minimum, fruit and vegetable imports from Mexico and allow the Florida industry to be commercially viable into the future.

III. Conclusion

Given the Florida industry's pressing need for effective border measures to stem further import harm, FFVA asks the Administration to take all necessary steps possible during the USMCA Joint Review to achieve the seasonal TRQ arrangements described above.

FFVA looks forward to working with the U.S. Government to help secure the requested relief and deeply appreciates the Administration's strong commitment to sustaining America's food production.

Respectfully submitted,

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