



October 29, 2020

The Honorable Lisa R. Barton
International Trade Commission
500 E Street SW
Washington, DC 20436

Re: Investigation No. TPA-105-008: *Economic Impact of Trade Agreements Implemented Under Trade Authorities Procedures, 2021 Update; Notice of Institution of Investigation and Schedule of a Public Hearing*

Dear Secretary Barton,

The North American Meat Institute (NAMI or the Meat Institute) appreciates the opportunity to comment on the aforementioned investigation regarding the economic impact of trade agreements implemented under Trade Authorities Procedures.

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 NAMI member companies account for more than 95 percent 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.

All segments of the U.S. economy stand to benefit from the international success of the U.S. agricultural sector. The U.S. Department of Agriculture (USDA) estimates that the \$139.6 billion in 2018 (the last data set available) of U.S. agricultural exports produced an additional \$162.9 billion in economic activity for a total of \$302.5 billion of economic output. Agricultural exports also supported 1,048,000 full-time civilian jobs, including 691,000 jobs in the nonfarm sector.¹ Furthermore, the current U.S. Free Trade Agreement (FTA) partner countries represent 10 percent of the world's GDP and 6 percent of the global population, yet they account for 43 percent of U.S. agricultural exports to the world, up from 29 percent in 1990, before the majority of U.S. FTAs were implemented.²

The U.S. meat and poultry industry is the economic engine powering the agriculture sector, accounting for \$1.02 trillion in total economic output or 5.6 percent of gross domestic product (GDP), according an economic impact analysis conducted by John Dunham & Associates. The

¹ Effects of Trade on the U.S. Economy. (n.d.). Retrieved October 07, 2020, from <https://www.ers.usda.gov/data-products/agricultural-trade-multipliers/effects-of-trade-on-the-us-economy/>

² June 24, 2. (n.d.). Free Trade Agreements and U.S. Agriculture. Retrieved October 07, 2020, from <https://www.fas.usda.gov/data/free-trade-agreements-and-us-agriculture>

meat and poultry industry is responsible for 5.4 million jobs and \$257 billion in wages, the report found. An estimated 527,019 people have jobs in production and packing, importing operations, sales, packaging, and direct distribution of meat and poultry products. Wholesaling directly employs an estimated 232,418 individuals in all 50 states, and 1.11 million retail jobs depend on the sale of meat and poultry products to the public. In total, the meat and poultry industry (packers, processors, wholesalers, and retailers) directly employs 1.9 million people, paying \$71.63 billion in wages and benefits. In addition, approximately two million full-time equivalent jobs are created in firms that supply goods and services to the meat and poultry industry.³

The domestic U.S. meat and poultry industry's long-term economic viability, though, is dependent upon robust international trade, particularly as domestic per capita consumption of meat and poultry remains stable. In fact, the industry has been one of the clear beneficiaries of international trade liberalization over the past several decades. In 2019, the U.S. meat and poultry industry contributed nearly \$19.4 billion to the estimated \$136.7 billion in agricultural exports.⁴

Much of this strong export performance can be attributed to bilateral and multilateral FTAs implemented under Trade Authorities Procedures, which have increased the profitability of meat and poultry products for U.S. farmers, ranchers, packers, processors, and exporters, while also reducing retail prices for U.S. consumers. The access these agreements offer to additional, more cost-effective inputs also augments the entire interconnected food supply chain from farm to fork. To remain competitive globally, the industry relies on enforceable trade agreements that increase market access and are founded on the principles of science-based standards advanced by World Trade Organization and other standard-setting bodies. Importantly, FTAs foster a more stable, transparent, and predictable trading environment for the U.S. meat and poultry industry, and support farm income and America's rural communities.

Particular attention in the ensuing comments will be paid to the benefits derived from the North American Free Trade Agreement (NAFTA)/U.S.-Mexico-Canada Agreement (USMCA), the U.S.-Colombia Trade Promotion Agreement, the U.S.-Korea Free Trade Agreement (KORUS), the U.S.-Australia Free Trade Agreement, and the Dominican Republic-Central America FTA (CAFTA-DR). Collectively, these agreements have boosted U.S. meat and poultry trade through reductions in tariffs and non-tariff barriers, eliminating many onerous, unjustified, often trade-prohibitive regulations. The disproportionately positive economic impact on the U.S. meat and poultry industry, and broader agriculture sector, stemming from these agreements, and other trade liberalization mechanisms, is incontrovertible.

North American Free Trade Agreement (NAFTA)/U.S.-Mexico-Canada Agreement (USMCA)

With the productivity of the U.S. food and agricultural sector growing faster than domestic demand, the U.S. meat and poultry industry — and the communities that depend on it — rely heavily on export markets, most notably the North American market, to sustain prices and

³ Dunham, J. et al (n.d.). New 2016 Data. Retrieved October 07, 2020, from <https://www.meatfuelsamerica.com/>

⁴ All data cited in these comments are pulled from the Global Agricultural Trade System, <https://apps.fas.usda.gov/gats/default.aspx>

revenues. The North American market, buoyed by NAFTA, has played a central role in boosting incomes for millions of U.S. farmers, ranchers, meat and poultry processors, allied manufacturers, and packaging and transportation companies. The recent entry into force of USMCA will sustain this progress by preserving duty-free access for U.S. meat exports and by improving access for U.S. poultry exports to Canada.

Under NAFTA, U.S. meat and poultry exports to Mexico and Canada thrived as import duties were removed and non-scientific barriers to trade were measurably reduced. The significance of NAFTA, and now USMCA, to the meat industry is irrefutable. Since NAFTA's entry into force in 1994, U.S. beef exports to Canada and Mexico grew from \$525 million to an annual average level of more than \$1.8 billion over the past five years, while pork exports increased in value from \$150 million to an annual average level of more than \$2.13 billion during last five years. In 2017, the last full year of trade data prior to Section 232 retaliatory tariffs on U.S. beef and pork, Canada and Mexico imported more than \$4 billion, or 30 percent, of U.S. red meat exports – an amount that would have been unattainable without NAFTA, and will be sustained as a result of USMCA. In 2019, Canada and Mexico were top-four markets for U.S. pork exports and top-five markets for beef exports, by value, importing \$3.86 billion, or 26 percent, of total U.S. red meat exports. Similarly, the countries were the top two destinations for U.S. poultry exports, by value.

The North American market is also nearly completely integrated for the meat and poultry industry, and maintaining this integration is vital for the millions of workers the industry employs, both directly and indirectly. Take, for example, the U.S. beef industry, which relies on imported livestock and beef from North America to meet domestic demand and to service foreign customers. The Canadian and Mexican cattle and beef industries play crucial roles in complementing the U.S. cattle and beef industries. In fact, Canada and Mexico are the U.S.'s top two cattle suppliers, due to their geographic proximity and the complementarity of their cattle and beef industries to that of the United States. In 2019, the U.S. imported 2.07 million head of cattle, with imports from Mexico totaling 1.32 million head and imports from Canada reaching 746,000 head. These imports supplemented U.S. commercial cattle slaughter, which remained at 33 million head.

In addition to the aforementioned cattle imports, beef imports from Canada and Mexico, which are among the U.S.'s top three suppliers annually, complement and bolster U.S. domestic production. Imported beef is generally grass-fed, leaner than U.S. grain-fed beef, and consists primarily of frozen, boneless, manufacturing beef that enters channels for further processing. Imported lean beef is commonly mixed with high-fat trimmings from U.S. grain-fed cattle production to achieve the desired fat content for further processing, such as the pre-formed beef patties used in the fast-service food sector. Moreover, imported frozen beef is often mixed with domestic lean fresh beef and fat trimmings to produce hamburgers, hot dogs, meatballs, and other manufactured items for retail stores. These imports, like the U.S.'s significant exports to Canada and Mexico, add value to, and generate revenue for, the domestic industry and allied industries involved in the production and sale of meat and poultry products.

It is clear this integration has not only improved our industry's efficiency by enabling U.S. producers to focus on their comparative advantages, but that it has also cemented the U.S.'s

position as the main supplier to these proximate markets. U.S. pork exports account for 89 percent of Mexico's total imports and an estimated 38 percent of consumption,⁵ whereas U.S. beef exports account for 73 percent of Mexico's total beef imports and approximately 6 percent of consumption. Furthermore, Mexico is the top volume market for U.S. beef variety meat exports and is traditionally the largest international volume market for U.S. pork. Meanwhile, U.S. pork accounted for 87 percent of Canada's imports and 25 percent of consumption, on average, over the past five years, while U.S. beef comprised 61 percent of Canada's imports and 15 percent of consumption, on average, over that same period. Canada is also the top market for U.S. processed (value-added) meat exports, with 2019 export value exceeding \$600 million, followed by Mexico for which exports were \$260 million, and together accounted for 61.5 percent of total U.S. processed meat exports of \$1.4 billion.

Without the market integration and level of duty-free access NAFTA created and USMCA extends, the U.S. meat and poultry industry would be at a competitive disadvantage in its own backyard, as the European Union (EU), and other major exporters, have concluded free trade agreements with both Canada and Mexico.

USMCA's recent entry into force is especially timely and significant for the U.S. poultry – particularly, chicken – industry. The U.S. is Canada's largest supplier of chicken meat typically commanding an 80-85 percent share of the import market, though recent implementation of the Comprehensive Economic and Trade Agreement with the EU and the Comprehensive and Progressive Agreement for Trans-Pacific Partnership (CPTPP) risks threatening the U.S. poultry industry's substantial market footprint.⁶ USMCA, however, establishes a new tariff rate quota (TRQ) for U.S. chicken imports that will gradually increase to 62,963 metric tons (mt) by year 16 of the agreement, while allowing U.S. chicken imports to also enter duty-free under Canada's World Trade Organization TRQ. The U.S. International Trade Commission estimates that these actions, combined with expanded access for U.S. turkey exports, could cause U.S. chicken exports to Canada to increase by 50 percent in year 6 of the agreement, and U.S. turkey exports to rise by 29 percent.⁷ Without USMCA, these figures would be unattainable, and U.S. poultry producers and processors would face prohibitive duties, exacerbated by preferential tariffs and TRQs established for European and Asian competitors.

In addition to the market access benefits USMCA provides, the agreement reinforces the already strong regulatory and food safety framework followed by the North American meat and poultry industry by committing the countries to implement enhanced science-based sanitary and phytosanitary measures, including for certification, regionalization, and equivalency determinations. This elevation in standards extends to the agreement's intellectual property

⁵ Throughout this document, per capita consumption and U.S. market share are in product weight. These values exclude variety meats.

⁶ Lupescu, M. (2020, August 26). USDA GAIN Report: Poultry and Products Annual. Retrieved October 07, 2020, from https://apps.fas.usda.gov/newgainapi/api/Report/DownloadReportByFileName?fileName=Poultry%20and%20Products%20Annual_Ottawa_Canada_09-01-2020

⁷ U.S.-Mexico-Canada Trade Agreement: Likely Impact on the U.S. Economy and on Specific Industry Sectors. (2019, April). Retrieved 2020, from <https://www.usitc.gov/publications/332/pub4889.pdf>

chapter, which provides important procedural safeguards for the recognition of new geographical indications (GIs), including strong mechanisms designed to prevent issuances of GIs that would block U.S. producers from using common names. The chapter further institutes a consultative mechanism regarding the future of GIs. This is critical, given the EU's trade agreements with Canada and Mexico and its history of co-opting common name products by erroneously asserting GI protective status. The onerous labeling, rebranding, and production costs associated with GI compliance could cripple domestic producers of common name meat products and cause some to shutter completely. The improved GI provisions outlined in USMCA provide a path to protect common name food producers, and their economic interests, in the North American market.

U.S.-Colombia Trade Promotion Agreement

Following entry into force of the U.S.-Colombia Trade Promotion Agreement (TPA) on May 15, 2012, the U.S. has garnered a growing and substantial share of Colombia's total pork imports. Under the TPA, U.S. pork benefited from the predictability provided following the elimination of the price band tariff system Colombia maintains as a member of the Andean Community customs union, under which U.S. pork imports were subject to both a standard import duty, set annually, and variable duty rates that could change every two weeks. U.S. pork now enters Colombia duty-free. As a result, the U.S. is now the top foreign supplier of pork to Colombia, providing approximately 90 percent of the country's pork imports.

Colombia's other major pork suppliers include Canada and Chile, both of which also have free trade agreements with Colombia. Despite Chile's previous market dominance, the TPA has enabled the U.S. to eclipse both Chile and Canada, though Canada's duty-free quota on pork, which currently stands at 6,200 mt, will be eliminated in 2023, paving the way for unlimited volumes of duty-free pork imports to compete with U.S. imports. Nevertheless, without the TPA, the U.S. would not have been able to amass such a significant share of the Colombian market due to what would have been a marked tariff disadvantage.

Colombia is now the U.S. pork industry's seventh largest export market. In 2019, U.S. pork export volume totaled 101,236 mt, valued at more than \$221 million. From 2009-2019, Colombian per capita pork consumption increased by an average of 12 percent per year, as growth in domestic production could not keep pace with increasing demand. Although pork production in Colombia is expected to continue to increase, consumption is projected to outpace production in the near-term, underpinning the value of the TPA for the U.S. pork industry, which can capitalize on this demand.

In addition to securing significant tariff reductions, the TPA provided a bilateral negotiating forum to address sanitary measures, technical barriers to trade, and other market access restrictions. Most notably, following the TPA's entry into force, Colombia agreed to remove unnecessary and trade prohibitive trichinae risk-mitigation requirements on U.S. pork. Prior to the implementation of the TPA, Colombia required U.S. fresh and chilled pork imports to undergo costly tests for trichinae. In 2013, Colombia recognized the U.S. as having negligible risk for trichinae, and promptly eliminated the testing requirement, thereby expanding the export potential for the U.S. pork industry.

U.S.-Korea Free Trade Agreement (KORUS)

The entry into force of the U.S.-Korea Free Trade Agreement (KORUS) in 2012, followed by the subsequent modernization of the agreement in 2018, continues to pay dividends for the U.S. meat industry. The market access terms secured in KORUS – specifically, both the immediate and gradual elimination of tariffs on the vast majority of U.S. pork and beef imports – have yielded one of the leading, most reliable markets for U.S. meat exports.

The U.S. is now the largest supplier of beef to Korea and trails only the European Union as the second-largest pork supplier. Under KORUS, most U.S. pork products enter Korea duty-free, whereas the duty rate on U.S. beef has been reduced from 40 percent to 16 percent and will continue to decline each year until it is eliminated in 2026. USDA export data provide empirical support to underscore the boon of this tariff elimination for the U.S. meat industry. For example, prior to the implementation of KORUS, U.S. exports of beef and pork to Korea in 2012 exceeded \$1 billion, with volume of 276,000 mt. This included 126,000 mt valued at \$582 million for beef and 150,000 mt, valued at \$421 million for pork. Upon entry into force of the agreement, and the tariff reductions associated with its implementation, U.S. beef and pork export value to Korea grew to exceed \$2.4 billion in both 2018 and 2019, with volume of 482,000 mt and 463,000 mt in 2018 and 2019, respectively. Accordingly, in 2019, U.S. beef export value achieved a record \$1.84 billion, with volume reaching 255,800 mt. Pork exports to Korea in 2019 were valued at \$593 million on volume of 207,650 mt, just shy of the \$670 million record set in 2018. This level of growth, combined with the significant share of the Korean market the U.S. meat industry now commands, would not have been possible in the absence of KORUS, especially because all major red meat competitors, including Australia and Canada, have free trade agreements with Korea.

The U.S., however, benefited from KORUS' earlier entry into force, offering the U.S. industry a crucial head start on tariff elimination. For example, Australian beef is subject to a 21.3 percent tariff in 2020, compared to the U.S. rate of 16 percent, and must contend with a restrictive import safeguard. This initial tariff advantage made U.S. beef and pork products more affordable and accessible to Korean consumers, thereby bolstering consumption of these products in a market with a significant, growing middle class. A study published in the *International Journal of Trade and Global Markets* found evidence that KORUS implementation was correlated with a growing proclivity by Korean consumers to purchase U.S. beef over its competitors' products.⁸ KORUS, not only introduced Korean consumers to an array of U.S. beef products at competitive prices, but it also influenced consumer behavior, by enabling Korean consumers to develop an enduring preference for U.S. beef.

The U.S. industry's comparative tariff advantage, solid price competitiveness, and increased consumer marketing activities – benefits KORUS afforded – have contributed to the growing market share U.S. beef and pork imports now command. The U.S. share of Korea's total beef imports grew from 36 percent in 2012 to 53 percent in 2019, and is estimated to reach 59 percent in 2020. Korea is a dominant market for U.S. short ribs, but the U.S. has also been exporting

⁸ Muhammad, A., Thompson, J., & Lewis DeLong, K. (2019, September). Implications of KORUS on U.S. beef in South Korea. Retrieved October 07, 2020, from https://www.researchgate.net/publication/335608448_Implications_of_KORUS_on_US_beef_in_South_Korea

more cuts in the short plate/brisket, chuck roll, and shoulder clod categories. U.S. beef accounted for 19 percent of Korea's consumption in 2012, 34 percent in 2019, and is projected to reach 36 percent in 2020. Likewise, the U.S. share of Korea's pork imports has increased, albeit it at a slower pace, rising from 32 percent in 2012 to an estimated 39 percent in 2020. U.S. pork accounted for 11 percent of consumption in 2012 and 12 percent on average over the past 5 years. This momentum will likely continue as Korean disposable income is expected to grow from \$16,605 in 2019 to \$17,911 in 2024, driving continued demand for U.S. products.⁹

The export growth KORUS generated has also added value across the meat and poultry supply chain. For instance, U.S. beef exports to Korea averaged \$70.52 for every fed head slaughtered in 2019, as the second largest market for U.S. beef, after Japan, whereas U.S. pork exports to Korea averaged \$4.56 for each head harvested in 2019. Korea was the U.S. pork industry's fifth largest market in 2019.¹⁰

Beyond tariff relief, KORUS established strong, science-based trade measures that further contributed to the proliferation of U.S. meat exports to Korea. The agreement established a Sanitary and Phytosanitary (SPS) Committee to enhance cooperation and consultation on SPS matters. This Committee works to achieve regulatory harmonization through the use of international standards and guidelines, including those of the World Organization for Animal Health, to address animal health and food safety concerns. These and other mechanisms facilitate trade in meat and poultry products by promoting transparency and by discouraging, and enshrining a process to resolve, unjustified, often capricious impediments to that trade.

U.S.-Australia Free Trade Agreement

The U.S.-Australia FTA, implemented in 2005, is perhaps most consequential for the enhanced collaboration it has fostered between the two countries. Before the FTA entered into force, Australia's duties on U.S. pork and beef were already zero, with the exception of some processed pork products, which were subject to a 5 percent duty that was phased out. Despite the FTA, Australia continues to restrict access for chilled/frozen U.S. beef and largely limits imports of U.S. pork to product that is destined for further processing.

Notwithstanding the foregoing restrictions, U.S. exports of pork to Australia have grown dramatically, from \$10.6 million in 2004 to more than \$300 million in 2019. Volume increased from 3,400 mt in 2004 to more than 105,000 mt in 2019. Roughly 70 percent of Australia's processed pork is produced using imported product, making it a lucrative destination for U.S. hams and picnics. In fact, U.S. pork accounted for 50 percent of Australia's imports in 2019, up from 24 percent in 2006, and 22 percent of consumption – a significant jump from 6 percent in 2006. U.S. pork exports to Australia averaged \$2.32 for every hog harvested in 2019.¹¹

Moreover, Australia is the U.S.'s second largest supplier of imported beef and beef products after Canada. In 2019, the U.S. imported 238,899 mt of beef from Australia valued at nearly \$1.5 million. Most of this is frozen, lean, grass-fed beef used to produce hamburgers and other

⁹ Economic analysis provided by the U.S. Meat Export Federation

¹⁰ Ibid.

¹¹ Ibid.

manufactured products, which allows U.S. producers to customize their beef patties to the specifications desired by U.S. food service customers. These imports complement the U.S. domestic supply and add value to product that would otherwise be less enticing to U.S. consumers, thereby enabling U.S. beef producers to maximize their returns.

Dominican Republic-Central America Free Trade Agreement (CAFTA-DR)

The CAFTA-DR, which entered into force on a rolling basis from 2006 to 2009, leveled the playing field for U.S. workers, farmers, and companies in the dynamic, developing markets of Central America and the Dominican Republic. The U.S. agriculture sector, and meat and poultry industry in particular, benefited exponentially from the market access gains secured in the agreement. U.S. meat and poultry exports, which now enter the CAFTA-DR region duty free, have been able to penetrate several of the signatory countries' retail, foodservice, and processing sectors. This growth followed the elimination of tariffs as high as 47 percent on U.S. pork, 30 percent on beef, and 164 percent on poultry.

For instance, U.S. pork and pork product exports rose in value from less than \$30 million in 2005 to more than \$266 million in 2020, a staggering increase of 787 percent since the agreement took effect. The Dominican Republic has been a particular bright spot for the U.S. pork industry, which accounts for 93 percent of the Dominican Republic's total pork imports, fueled by strong demand from the country's bustling tourism industry. In recent years, pork has emerged as a center-of-the-plate protein in the Dominican Republic, and in 2019, U.S. pork accounted for 35 percent of the country's total pork consumption.

Likewise, U.S. pork exports to Honduras and Guatemala have experienced record-high years since 2016 and 2014, respectively. The U.S. now accounts for 98 percent of total pork imports to Honduras and 97 percent of pork imports to Guatemala. Honduras is only 18 percent self-sufficient in pork production, and thus depends on U.S. pork imports to meet its intensifying demand. Although Guatemala is more self-sufficient – 70 percent vs. 18 percent, in the case of Honduras – imported pork consumption is rising rapidly, and the U.S. is now responsible for supplying 30 percent of Guatemala's total pork consumption. In fact, Guatemala is the leading destination in Central America for pork variety meat and is the second largest market after Mexico for U.S. exports of prepared/preserved pork variety meat.

The reductions in self-sufficiency observed in the abovementioned markets, combined with the pervasive consumer demand for U.S. pork, presents ripe commercial opportunities for the U.S. pork industry that will undoubtedly yield meaningful returns.

The success of U.S. beef exports to the region is equally compelling. U.S. beef and beef product exports soared 1041 percent from \$12 million in 2005, to nearly \$137 million in 2020. This growth is particularly pronounced in Guatemala and the Dominican Republic, where 34 percent and 96.5 percent, respectively, of the countries' total beef imports are from the U.S. In 2019, U.S. beef exports to both Guatemala and the Dominican Republic posted records, following several years of sustained growth, driven by declining self-sufficiency in Guatemala and a booming travel and leisure industry in the Dominican Republic.

Notably, CAFTA-DR has been a boon for the U.S. poultry industry, with U.S. poultry export value to the region exceeding \$298 million in 2019, up 397 percent from \$60 million in 2005. Guatemala is the industry's eighth largest export market.

Conclusion

The aforementioned FTAs, along with other agreements and trade liberalization mechanisms implemented under Trade Authorities Procedures in Congress, laid the groundwork for the exponential rise in U.S. meat and poultry sector trade over the last few decades. Increased market access opportunities, fewer onerous import restrictions, and lower tariffs achieved after the entry into force of these agreements propelled this export growth, which subsequently boosted value and improved returns for U.S. producers and companies along the supply chain.

Preserving these agreements, while indispensable, will not alone guarantee export growth or the economic benefits it confers. This is especially true as China, the EU and other competitors forcefully, and swiftly, negotiate FTAs that shirk internationally-recognized standards and squeeze U.S. access to growing and mature markets, alike. Rather, the U.S. would be prudent to negotiate additional access with existing trading partners, while also pursuing new markets to compete effectively, for example, with China's proposed Regional Comprehensive Economic Partnership and the EU's mounting list of ratified FTAs and ongoing negotiations in Asia and the Americas. This work is already underway as the U.S. is involved in FTA negotiations with the United Kingdom and Kenya, among other countries.

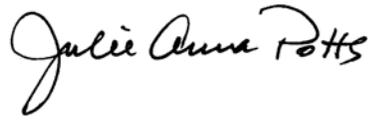
Rising incomes in both Africa – where 43 percent of the continent's population will belong to middle and upper classes by 2030¹² – and Asia – where 3.5 billion people will ascend to the middle class by 2030¹³ – will produce a burgeoning customer base likely amenable to purchasing high-quality U.S. meat and poultry products, as rising incomes are often correlated with observed increases in protein consumption. Although the U.S. meat industry has achieved significant success in Asian markets, largely due to FTAs, like KORUS, and other trade liberalization mechanisms, ceding markets in these regions would leave the industry, and the entire U.S. agricultural economy, in a precarious position. The costs – lost jobs, depressed incomes, oversupply – of willingly choosing disengagement are too high, and will be borne disproportionately by America's meat and livestock packers, processors, food industry workers, farmers, and ranchers.

Conversely, as detailed in the preceding comments, FTAs, implemented under the auspices of Trade Authorities Procedures, have been the primary drivers supporting economic growth and export momentum in the U.S. meat and poultry sector. They are also key to ensuring our trade-dependent industry remains competitive and viable in a global trading system, where 95 percent of consumers reside outside the U.S.

¹² Signé, L. (2020, April 10). Africa's emerging economies to take the lead in consumer market growth. Retrieved October 07, 2020, from <https://www.brookings.edu/blog/africa-in-focus/2019/04/03/africas-emerging-economies-to-take-the-lead-in-consumer-market-growth/>

¹³ Written by Katharina Buchholz, D. (n.d.). This chart shows the rise of the Asian Middle Class. Retrieved October 07, 2020, from <https://www.weforum.org/agenda/2020/07/the-rise-of-the-asian-middle-class/>

Respectfully submitted,

A handwritten signature in black ink that reads "Julie Anna Potts". The signature is written in a cursive style with a large initial 'J' and a distinct 'P'.

Julie Anna Potts
President and CEO