SWEETENER USERS ASSOCIATION

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October 31, 2025

Ms. Jennifer Thornton
General Counsel
Office of the United States Trade Representative
600 17th Street, NW
Washington, DC 20508

RE: Public Comment on the Operation of the Agreement Between the United States of America, the United Mexican States, and Canada (USTR-2025-0004), Federal Register, September 17, 2025, pp. 44869-44871.

Dear Ms. Thornton:

The Sweetener Users Association (SUA) strongly supports the renewal of the U.S.-Mexico-Canada Agreement (USMCA) for the full 16-year period contemplated in the agreement. The USMCA has resulted in expanded trade value, enhanced supply chains and multiple other benefits for the entire U.S. farm and food sector, including SUA member companies, who utilize sugar and other sweeteners in manufacturing foods and beverages.

For both Canada and Mexico, the United States is their largest trading partner. Farm and food trade within USMCA tripled between 2005 and 2023, rising to $275 billion. In addition to market access, USMCA's provisions on technical barriers to trade (TBT), sanitary and phytosanitary barriers (SPS) and biotechnology have been beneficial to the U.S. farm and food sectors.

In sweeteners, Mexico is the largest non-domestic supplier of sugar to the United States. Since the U.S. has always been a net importer of sugar and there is no prospect for complete self-sufficiency, sugar from Mexico plays a critical part in assuring the availability of ingredients for the U.S. food manufacturing sector. Those portions of the sector that use sugar in manufacturing account for more than 600,000 jobs. The sugar trade is complemented by large volumes of U.S. exports of high-fructose corn syrup (HFCS) to Mexico.

The first Trump administration secured a number of changes to the prior North American Free Trade Agreement (NAFTA), notably strengthening content requirements in the automotive sector and elsewhere. SUA urges the second Trump administration to negotiate an extension of the USMCA without major change so that the trading environment in North America will continue to be rules-based, transparent and beneficial to all three USMCA signatories.

Sincerely,

Richard Pasco
President
Sweetener Users Association