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**Comments on the Operation of the Agreement Between
the United States of America, the United Mexican States, and Canada**

November 3, 2025

The National Cotton Council (NCC) strongly supports a full renewal of the Agreement Between the United States of America, the United Mexican States, and Canada (USMCA).

The NCC is the central organization of the United States cotton industry. Members include cotton farmers, ginner, cottonseed processors and merchandizers, merchants, cooperatives, warehousemen, and textile manufacturers. There are approximately 14,000 American cotton family farms that produce the critical raw material that supports a domestic textile industry which employs over 471,000 U.S. workers. Seventy percent of annual U.S. textile industry exports are shipped to USMCA and CAFTA-DR countries as qualified goods.

Mexico represents a significant market for U.S. cotton and U.S. cotton manufactured textile products. In 2024, almost 600,000 bales of U.S. cotton were exported to Mexico, along with another 265,000 bales of U.S. manufactured yarns and fabrics. In addition, the United States imports the equivalent of approximately 650,000 bales of cotton in the form of textile and apparel goods.

The U.S. cotton industry strongly supports the continuation of duty-free status for qualifying cotton and textile goods under USMCA. We are also supportive of higher tariffs on non-qualifying trade that diminishes the benefits to the industries in the signatory countries.

The yarn-forward rule of origin is critical to the success of USMCA, and we strongly encourage that rule to be extended. Further, we encourage the Administration to reduce exceptions for use of third-party inputs that undermine the rule of origin. Finally, it is critical that the signatory countries maintain strong customs enforcement in order to minimize abuse of the preferential access to the U.S. market.

Thank you for your consideration of these comments.

Sincerely,

A handwritten signature in cursive script that reads "Gary M. Adams".

Gary M. Adams
President & CEO
National Cotton Council