



July 6, 2026

Megan Grimball, Esq.
Chair of the Section 301 Committee
Office of the United States Trade Representative
600 17th Street NW
Washington, DC 20506

**Comments by the
National Milk Producers Federation and the U.S. Dairy Export Council
on the Notice of Determinations and Request for Comments Concerning Actions in
Section 301 Investigations of Acts, Policies, and Practices of Various Economies Related
to the Failure to Impose and Effectively Enforce a Prohibition on the Importation of
Goods Produced with Forced Labor
Docket Number USTR-2026-0265**

Dear Ms. Grimball:

Our organizations submit the following comments in response to the Request for Comments Concerning Actions in Section 301 Investigations of Acts, Policies, and Practices of Various Economies Related to the Failure to Impose and Effectively Enforce a Prohibition on the Importation of Goods Produced with Forced Labor (USTR-2026-0265).¹ The National Milk Producers Federation (NMPF) and the U.S. Dairy Export Council (USDEC) appreciate the opportunity to present their views on this important issue.

NMPF develops and carries out policies that advance the well-being of dairy producers and the cooperatives they own. The members of NMPF's cooperatives produce over two thirds of the U.S. milk supply, making NMPF the voice of dairy producers on Capitol Hill and with government agencies. NMPF provides a forum through which dairy farmers and their cooperatives formulate policy on national issues that affect milk production and marketing. NMPF's contribution to this policy is aimed at improving the economic interests of dairy farmers, thus assuring the nation's consumers an adequate supply of pure, wholesome, and nutritious milk and dairy products.

USDEC is a non-profit, independent membership organization representing the global trade interests of U.S. dairy farmers, dairy processors and cooperatives, dairy ingredient suppliers and export trading companies. Its mission is to enhance U.S. global competitiveness and assist the U.S. industry to increase its global dairy ingredient sales and exports of U.S. dairy products. USDEC and its 100-plus member companies are supported by staff in the United States and overseas in Mexico, South America, Asia, Middle East and Europe.

It is our understanding that this investigation is an important element in the U.S. strategy to ensure implementation of the various completed Agreements on Reciprocal Trade (ART). We strongly

¹ See 91 Fed. Reg. 34,272 (June 5, 2026).

support the ARTs and are eager to see each of them swiftly implemented in full by our trading partners so that our exporters can begin to enjoy the benefits of these agreements. We also very much support ongoing USTR efforts to negotiate additional ARTs that yield export benefits for the U.S. dairy industry.

NMPF and USDEC support the decision reflected in Annex to omit dairy from Annex A's list of products excluded from tariffs. This is an appropriate approach, in particular given that the markets that will be subject to duties under the proposed actions include several that maintain high tariffs and onerous non-tariff barriers on U.S. dairy exports, such as the European Union, India, and the United Kingdom. Compounding high tariff rates, many of the markets subject to proposed duties maintain a series of nontariff barriers to dairy trade that inhibit U.S. exporters' ability to access the market, including outright bans on the ability to sell common name products like "parmesan." Omitting dairy products from tariff exclusion lists is the correct approach. We urge USTR to ensure that dairy codes are not included in the final exclusions list.

However, we would support USTR extending to other U.S. Free Trade Agreement partners the same benefits available to Mexico and Canada for USMCA-compliant imports in terms of exemption from the additive Sec. 122 or 301 tariff rates for their FTA-compliant imports.

On behalf of NMPF and USDEC's 130-plus member companies, we appreciate the opportunity to provide comments on these important issues, and we remain available to provide any further clarification as needed. Should you have any questions, please feel free to contact Shawna Morris, whose contact information is provided below.

Point of Contact:

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