MissouriCorn GrowersAssociation
PLANTING OPPORTUNITY

MISSOURI CORN GROWERS 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
Submitted electronically to https://comments.ustr.gov/s/

Re: Public Comment on the United States-Mexico-Canada Agreement (USTR-2025-0004)

Dear Ms. Thornton:

The Missouri Corn Growers Association (MCGA) appreciates the opportunity to submit the following comments to the Office of the United States Trade Representative (USTR) on the United States-Mexico-Canada Agreement (USMCA). Since the July 1, 2020, implementation, U.S. corn exports to Mexico and ethanol exports to Canada have steadily increased, making them the largest, most important, and consistently reliable export markets for the U.S. corn and corn products industries.

In fact, corn exports from Missouri to North America have nearly tripled since USMCA was first drafted. These exports support 5,593 Missouri jobs and contribute $364 million to the state's economy through direct, indirect, and induced impacts. More than 99 percent of Missouri's $367 million in corn exports are destined for a North American USMCA partner, primarily Mexico. These numbers do not include the exports of ethanol, ethanol co-products, and corn-fed livestock. The agreement's duty-free framework and modernized trade rules have provided economic stability and new opportunities for rural communities.

While bulk corn exports remain vital, ethanol represents a significant growth opportunity for the corn sector, especially in Mexico. While the U.S. has exported ethanol to Canada for more than a decade, Mexico could rival that success if policies allow expanded trade.

The current blending standard in the United States is 10% ethanol (E10) in gasoline, with higher blends becoming more available and sought after by consumers. Despite increased fuel consumption, Mexico currently does not blend ethanol into its gasoline supply due to regulatory hurdles. If a national E10 standard were adopted, U.S. corn-based ethanol could help meet the growing demand while reducing emissions and costs for Mexican consumers.

In addition, expanded ethanol access could narrow the U.S.-Mexico agricultural trade imbalance by more than $2 billion. For the U.S., increased ethanol access through a nationwide E10 blend rate in Mexico could create a 1.2-billion-gallon market (equivalent to 425 million bushels of corn)

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and significantly reduce the $12.2 billion U.S.-Mexico agricultural trade deficit. Beyond corn and ethanol, open trade under USMCA also broadly supports Missouri corn-fed meat exports to North America, totaling $55 million in 2024.

One key component of USMCA is its science-based agricultural biotechnology, sanitary and phytosanitary provisions. These provisions were instrumental in the successful U.S. challenge to Mexico's 2020 and 2023 decrees banning genetically modified corn. With strong support from MCGA and others, USTR launched a dispute using USMCA's Chapter 31 process and ultimately prevailed, with the formal rescission announced in February 2025. However, emerging threats to the trade of genetically modified corn remain in Mexico's regulatory framework and constitutional amendments.

USMCA also contains enforceable commitments on the efficient processing of biotechnology approvals, another issue the agricultural industry has raised with Mexico. While Mexico's inaction on biotechnology approvals has been resolved without invoking Chapter 31, the protections afforded under the agricultural biotechnology chapter are necessary, comprehensive, and vital to address disruptions caused by a lack of timely approvals. MCGA strongly encourages the agricultural biotechnology provisions remain intact and unchanged.

The case for approving the agreement in 2020 was incredibly strong. That case remains strong, if not stronger today. Missouri corn growers, as well as many food and ag businesses, are currently struggling. The combination of low commodity prices, high input costs and interest rates, combined with the lack of new domestic policies driving corn demand, is negatively impacting today's farmers. Providing certainty about continued trade with two of our three largest export markets would offer America's farmers and food manufacturers a much-needed boost. Simply put, U.S. farmers need a market win—now.

USMCA has created a level playing field that allows Missouri farmers, companies, and employees to compete in the closest and crucial export markets. Given the agreement's proven success, MCGA strongly urges USTR to support a full 16-year renewal of USMCA with no modifications. America's corn farmers cannot afford to lose their most important markets. We appreciate the opportunity to submit these comments for the 2026 USMCA Review and look forward to working with you on a swift, successful 16-year renewal.

Respectfully,

Brian Lehman

Brian Lehman
MCGA President