Farm Action

November 3, 2025
Submitted via comments.ustr.gov

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Re: Request for Comments on the 2026 USMCA Joint Review

Dear Mr. Oliver and Mr. Young:

Farm Action appreciates the opportunity to provide comments to the Office of the U.S. Trade Representative (USTR) as part of the 2026 Joint Review of the United States-Mexico-Canada Agreement (USMCA). We urge USTR to prioritize the reinstatement of Mandatory Country of Origin Labeling (MCOOL) for beef and pork as a top U.S. trade objective.

Farm Action is a farmer-led organization that develops and advances bold solutions to stop corporate monopolies, hold government accountable, and build fair competition in rural America.[1] Its activities include education through reports, blogs, and other educational tools; collaboration with a variety of other organizations; and policy reform efforts that have shaped legislation and public policy.

The need for MCOOL could not be more urgent. America's cattle industry is at a crossroads: the national beef cow herd inventory is at its lowest level in decades[2], and in order to rebuild herds, independent ranchers need reliable market signals that their product will be differentiated and fairly valued. The United States Department of Agriculture (USDA) recently took a positive step by closing the loopholes that previously allowed imported meat to be labeled "Product of USA." However, because this label is only voluntary, it does not ensure that all beef and pork carry origin information. The multinational packers that dominate U.S. meatpacking can still choose not to label their products at all—leaving consumers in the dark and U.S. ranchers without reliable differentiation.

[1] More information about Farm Action is available at its website: https://farmaction.us/about-us/.
[2] United States Department of Agriculture. (2025, July 25). United States Cattle Inventory Report. *National Agriculture Statistics Service*. Retrieved October 27, 2025, from https://www.nass.usda.gov/Newsroom/2025/07-25-2025.php.

While MCOOL aligns with longstanding, bipartisan commitments to "Buy American" and "Made in America," it is more than a symbolic issue. MCOOL is a market-making policy that would provide cattle and pork farmers with a fair playing field, incentivize cattle herd growth, and restore transparency for consumers.

I. Background on MCOOL

A. Origins of the Law

Congress first enacted MCOOL in the 2002 Farm Bill,[3] requiring retailers to identify country-of-origin labeling for beef, lamb, pork, fish, peanuts, fresh fruit, and vegetables. The policy was driven by two simple but powerful objectives: to provide consumers with transparency at the point of purchase and to give U.S. farmers and ranchers a fair chance to compete on the basis of origin. These laws responded to mounting consumer demand for food system openness and to producer frustrations that imported and domestic meat were indistinguishable in the marketplace.

B. The WTO Dispute and Repeal

From 2008 to 2015, Canada and Mexico challenged MCOOL at the World Trade Organization (WTO). WTO panels ruled that the specific design of U.S. labeling and record-keeping requirements imposed disproportionate costs on imported livestock, thereby affording them less favorable treatment than domestic animals. The WTO authorized over $1 billion in retaliatory tariffs,[4] and in 2015 Congress repealed MCOOL for beef and pork[5] to avert escalating trade disputes. Importantly, the WTO did not strike down the principle of origin labeling itself,[6] which continues to apply to other covered commodities such as chicken, lamb, fish, nuts, and produce. The dispute turned on the implementation of MCOOL for beef and pork, leaving the door open for a nondiscriminatory, WTO-compliant program.

Equally important, the core concerns that Canada and Mexico raised at the WTO can be resolved directly through negotiations under the USMCA framework. Because those two countries were the complainants in the original WTO dispute, reaching agreement with them through the Joint Review process would effectively resolve prior rulings and eliminate the risk of renewed WTO challenges. This highlights why it is essential that USTR elevate MCOOL as a priority in the 2026 USMCA review and use this forum to negotiate a durable, continent-wide solution.

C. Impact of Repeal on the U.S. Cattle Market

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[3] H.R.2646 – 107th Congress (2001-2002): Farm Security and Rural Investment Act of 2002. (2002, May 13). https://www.congress.gov/bill/107th-congress/house-bill/2646.

[4] World Trade Organization. (2012, July 23). *United States – Certain Country of Origin Labelling (COOL) Requirements* (WT/DS384 and WT/DS386), https://www.wto.org/english/tratop_e/dispu_e/cases_e/ds384_e.htm; https://www.wto.org/english/tratop_e/dispu_e/cases_e/ds386_e.htm.

[5] NBC News. (2016, January 4). *Meat labeling law repeal leaves buyers in dark about product origins*, https://www.nbcnews.com/business/consumer/meat-labeling-law-repeal-leaves-buyers-dark-about-product-origins-n489771.

[6] World Trade Organization. (2012, July 23). *United States – Certain Country of Origin Labelling (COOL) Requirements* (WT/DS384 and WT/DS386), https://www.wto.org/english/tratop_e/dispu_e/cases_e/ds384_e.htm; https://www.wto.org/english/tratop_e/dispu_e/cases_e/ds386_e.htm.

The repeal of MCOOL in 2015 had lasting consequences for America's cattle producers. Without clear labeling, imported beef gained equal footing with U.S.-raised cattle in the marketplace, erasing the premium that origin labeling once provided to domestic producers. According to USDA data, the U.S. beef herd inventory fell from about 29 million head in 2015 to just over 28 million in 2024[7]—the smallest herd inventory since the early 1960s.[8] During the same period, U.S. beef imports increased, with over 4.6 billion pounds entering the domestic market in 2024, much of it from Australia, Brazil, Mexico, and Canada.[9]

For much of the last decade, these factors together placed downward pressure on cattle prices, particularly for smaller and independent ranchers who rely on differentiated markets to remain viable. Multinational meatpackers benefited from the ability to commingle foreign product, capturing higher margins at the expense of U.S. producers. In the years since repeal, many ranchers have cited the lack of transparent market signals as a barrier to reinvestment and herd expansion.[10]

D. Persistence of Support

Despite repeal, bipartisan support for MCOOL has endured across the political spectrum. In 2021, Congress, led by Senator Thune (R-SD), introduced the American Beef Labeling Act,[11] directing USDA and USTR to identify a WTO-compliant pathway to reinstatement, and the bill has since been reintroduced in subsequent Congresses. Farmers, ranchers, consumer advocates, and lawmakers continue to press for reform, reflecting the policy's broad popularity. Public opinion has been remarkably consistent: A 2017 Consumer Federation of America survey found that 88 percent of Americans supported requiring origin information on fresh meat[12], and a 2024 Verasight poll[13] commissioned by Farm Action Fund confirmed that large majorities across party lines support reinstating MCOOL for beef and pork. Together, these data points demonstrate that MCOOL remains both a producer imperative and a consumer mandate.

II. Why MCOOL Should Be a U.S. Trade Priority

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[7] USDA. (2025, October 29). 2025 - Cattle, Cows, Beef - Inventory - Measured in Head on Jan 1, https://app.usda-reports.penguinlabs.net/?crop=cattle_cows_beef&statistic=inventory_head&yearet=&year=2025.

[8] USDA. (2024, February 27). Beef Cows: Inventory on January 1 by Year, US, https://www.nass.usda.gov/Charts_and_Maps/Cattle/bcow.php.

[9] Knight, R. (2025, May 22). *Cattle & Beef - Sector at a Glance*. Economic Research Service, U.S. Department of Agriculture, https://www.ers.usda.gov/topics/animal-products/cattle-beef/sector-at-a-glance.

[10] *Examining Markets, Transparency, and Prices from Cattle Producer to Consumer: Hearing before the U.S. Senate Committee on Agriculture, Nutrition, and Forestry,* 117th Cong. (2021), https://www.agriculture.senate.gov/imo/media/doc/E05AED58-5056-A066-605B-1C2A48946230/S.%20Hrg.%20117-376%20-%20Examining%20Markets%2C%20Transparency%2C%20and%20Prices%20from%20Cattle%20Producer%20to%20Consumer.pdf; Karnowski, S. (2025, July 31). *Ranchers say expanding herds to take advantage of record retail beef prices isn't so simple*. AP News, https://apnews.com/article/record-beef-prices-supply-demand-drought-350dfe6144ddaa2c0dc2661da043edd5.

[11] S.2716 - 117th Congress (2021-2022): American Beef Labeling Act of 2025. (2021, September 13), https://www.congress.gov/bill/117th-congress/senate-bill/2716?s=5&r=3.

[12] Large Majority of Americans Strongly Support Requiring Origin Information on Fresh Meat. (2017, July 24). *Consumer Federation of America*. Retrieved October 29, 2025, from https://consumerfed.org/press_release/large-majority-of-americans-strongly-support-requiring-origin-information-on-fresh-meat/.

[13] Veracity. (2025). *Farm Action Fund Survey,* https://reports.verasight.io/reports/farm-action-fund-2.

A. Market Incentives and Herd Growth

One of the greatest challenges facing the cattle industry is herd decline. USDA data show the beef cow herd has shrunk to its smallest size in more than sixty years. [14] Many factors contribute to ranchers' reluctance to expand herd size, but a critical barrier is the lack of clear market signals: without mandatory country-of-origin labeling (MCOOL), domestic beef cannot be distinguished from imported product, leaving ranchers without the assurance that consumers who want U.S.-raised beef can reliably identify and support it.

Reinstating MCOOL would correct this market failure. By ensuring consumers can choose U.S.-raised beef, the policy provides a direct market incentive for herd expansion. Producers could invest in rebuilding with confidence, knowing the marketplace rewards their origin claim rather than erases it.

B. Transparency and Consumer Trust

American consumers have consistently demanded greater transparency in food labeling. A national survey found that nearly nine in ten Americans strongly support requiring origin information on fresh meat.[15] For shoppers, knowing where their food comes from is a baseline expectation, not an optional feature. Research also demonstrates that country-of-origin labeling directly influences consumer purchasing decisions,[16] underscoring how consumer trust and preference influence demand.

While USDA's March 2024 final rule on the voluntary "Product of USA" label was a step forward—ensuring that only animals born, raised, slaughtered, and processed in the United States may carry the label beginning January 1, 2026.[17] Secretary Rollins has emphasized USDA's strong commitment to enforcing this new standard, underscoring that consumer trust depends on meaningful integrity in origin claims.[18] Yet, because the rule governs only a voluntary claim, companies can still choose not to disclose origin at all.

By contrast, Mandatory COOL establishes a universal baseline requirement: every package of beef and pork must display where the animal was born, raised, and slaughtered. This ensures that consumers receive consistent and enforceable transparency while providing U.S. producers with the reliable market differentiation they need.

C. Fair Competition for U.S. Producers

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[14] U.S. Department of Agriculture. (2024, February 27). Beef Cows: Inventory on January 1 by Year, US, https://www.nass.usda.gov/Charts_and_Maps/Cattle/bcow.php.

[15] Large Majority of Americans Strongly Support Requiring Origin Information on Fresh Meat. (2017, July 24). *Consumer Federation of America*. Retrieved October 29, 2025, from https://consumerfed.org/press_release/large-majority-of-americans-strongly-support-requiring-origin-information-on-fresh-meat/.

[16] Berry, C., Mukherjee, A., Burton, S., & Howlett, E. (2015). A COOL Effect: The Direct and Indirect Impact of Country-of-Origin Disclosures on Purchase Intentions for Retail Food Products. *Journal of Retailing*, *91*(3), 533–542, https://www.sciencedirect.com/science/article/pii/S0022435915000299.

[17] Voluntary Labeling of FSIS-Regulated Products with U.S.-Origin Claims, 89 FR 19470, (published March 18, 2024), https://www.federalregister.gov/documents/2024/03/18/2024-05479/voluntary-labeling-of-fsis-regulated-products-with-us-origin-claims.

[18] USDA, Beef Industry Plan: White Paper, October 2025, https://www.usda.gov/sites/default/files/documents/USDA%20Beef%20Industry%20Plan%20White%20Paper.pdf

Without the reinstatement of mandatory origin labeling under MCOOL, the competitive conditions for U.S. cattle and hog producers remain deeply skewed. In the beef sector, the "Big-Four" packers now process approximately 80-85% of all cattle in the U.S., while the U.S. pork industry is similarly concentrated, with the four largest packers purchasing about 67% of hogs in the domestic market.[19]

This concentration allows packers to source from both domestic and international suppliers, blending product streams while origin remains undisclosed in the supply chain. This effectively makes imported and U.S.-raised meat indistinguishable in the market, stripping domestic producers of the opportunity to command a premium for origin. For example, U.S. beef imports continue to run into the billions of pounds annually,[20] adding further pressure on American ranchers who face higher production costs, tighter regulations, and less flexibility than global competitors.

The consequences are significant: suppressed producer margins, diminishing herd size in the cattle sector, and consolidation that displaces smaller and mid-sized operations. Among hog producers, farms with hog sales dropped by approximately 13% between 2017 and 2022, from roughly 64,900 to 56,300 operations.[21] In the cattle market, consolidation trends were similar: "Cattle on feed" fell 15% during that same time period, from roughly 30,200 to 25,800.[22] Reinstating MCOOL would restore a necessary level of fairness: it would make origin transparent, enable domestic producers to compete on the basis of quality and traceability rather than anonymity, and help rebuild rural and farm-dependent economies.

D. Food Security and Resilience

Recent global disruptions have exposed the fragility of our international food chains. In 2024, U.S. beef imports reached approximately 4.6 billion pounds, a year-over-year increase of about 24% and a record high.[23] At the same time, U.S. beef production remains constrained by historically small herd numbers, leaving domestic supply under pressure.[24] Such heavy reliance on foreign beef places U.S. food security at risk, subjecting our meat supply and pricing to external forces such as trade disputes, weather events, and shifting foreign policy priorities.

Rebuilding a stronger domestic cattle and hog sector is not just a matter of economics—it is a national security imperative. The reinstatement of mandatory origin labeling under MCOOL would send a clear market signal that American-raised beef and pork matter. It would help ensure that food dollars remain in rural communities, create stronger domestic supply chains, and reduce exposure to global shocks. By adopting MCOOL, the U.S. can reclaim greater food sovereignty, guarantee a

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[19] Farm Action. (2024, July). *Agriculture Concentration Data*, https://farmaction.us/concentrationdata/.
[20] Grossen, G. (2025, September 5). *Livestock and meat international trade data*. Livestock and Meat International Trade Data, https://www.ers.usda.gov/data-products/livestock-and-meat-international-trade-data/.
[21] U.S. Department of Agriculture. (2024, May). *2022 U.S. Census of Agriculture Highlights: Hogs and Pigs*. National Agricultural Statistics Service, U.S. Department of Agriculture, https://www.nass.usda.gov/Publications/Highlights/2024/Census22_HL_Hogs_Pigs.pdf.
[22] National Agricultural Statistics Service, U.S. Department of Agriculture. (2022). *Cattle and Calves - Sales: 2022 and 2017,* https://www.nass.usda.gov/Publications/AgCensus/2022/Full_Report/Volume_1,_Chapter_1_US/st99_1_013_014.pdf.
[23] Knight, R. (2025, May 22). *Cattle & Beef - Sector at a Glance*. Economic Research Service, U.S. Department of Agriculture, https://www.ers.usda.gov/topics/animal-products/cattle-beef/sector-at-a-glance.
[24] Knight, R. (2025, May 22). *Cattle & Beef - Sector at a Glance*. Economic Research Service, U.S. Department of Agriculture, https://www.ers.usda.gov/topics/animal-products/cattle-beef/sector-at-a-glance.

steadier supply of meat for its consumers, and fortify our system against the uncertainties of the global marketplace.

III. Addressing Trade Compatibility Concerns

A. Settlement Opportunity in USMCA

The 2026 USMCA Joint Review provides a rare opportunity to resolve this issue directly with Canada and Mexico, the two countries that originally brought the WTO complaint. If an agreement is reached and embedded in USMCA, the United States will effectively remove the threat of another WTO challenge. This review process, therefore, provides the clearest pathway to a durable, WTO-compliant solution for reinstating MCOOL.

B. Legal History and Misconceptions

From 2008-2015, Canada and Mexico challenged the U.S. country-of-origin labeling law at the WTO. WTO panels found that the original U.S. labeling rules treated imported livestock less favorably by imposing disproportionate record-keeping costs, thus violating the "national treatment" obligation under the General Agreement on Tariffs and Trade (GATT).[25] Canada and Mexico then received authorization to impose more than $1 billion in retaliatory tariffs.[26] Congress then repealed MCOOL for beef and pork in 2015.[27]

Crucially, however, the WTO did not rule that the origin labeling itself was unlawful. Rather, it held that the U.S. implementation discriminated in practice.[28] That distinction is critical: the door remains open for a restructured MCOOL program that is nondiscriminatory and transparent.

C. Precedent for Negotiated Solutions

The U.S. has successfully defended or modified other policies challenged at the WTO without dismantling its domestic standards. Two examples stand out:

1. **Cotton subsidies:** After Brazil's WTO case against U.S. cotton programs, a negotiated settlement preserved key farm programs while addressing trade partner concerns.[29]

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[25] World Trade Organization. (2012, July 23). *United States – Certain Country of Origin Labelling (COOL) Requirements* (WT/DS384 and WT/DS386), https://www.wto.org/english/tratop_e/dispu_e/cases_e/ds384_e.htm; https://www.wto.org/english/tratop_e/dispu_e/cases_e/ds386_e.htm.

[26] World Trade Organization. (2012, July 23). *United States – Certain Country of Origin Labelling (COOL) Requirements* (WT/DS384 and WT/DS386), https://www.wto.org/english/tratop_e/dispu_e/cases_e/ds384_e.htm; https://www.wto.org/english/tratop_e/dispu_e/cases_e/ds386_e.htm.

[27] NBC News. (2016, January 4). *Meat labeling law repeal leaves buyers in dark about product origins*, https://www.nbcnews.com/business/consumer/meat-labeling-law-repeal-leaves-buyers-dark-about-product-origins-n489771.

[28] World Trade Organization. (2012, July 23). *United States – Certain Country of Origin Labelling (COOL) Requirements* (WT/DS384 and WT/DS386), https://www.wto.org/english/tratop_e/dispu_e/cases_e/ds384_e.htm; https://www.wto.org/english/tratop_e/dispu_e/cases_e/ds386_e.htm.

[29] World Trade Organization. (2005, March 21). *United States – Subsidies on upland cotton* (WT/DS267), https://www.wto.org/English/tratop_e/dispu_e/cases_e/ds267_e.htm.

2. **Clove cigarettes:** When Indonesia challenged the U.S. flavored-cigarette ban, the U.S. maintained its public health standards while narrowing implementation to comply with trade rules.[30]

These cases demonstrate that disputes can be resolved through negotiation and technical fixes, not wholesale repeal. A similar approach is feasible for MCOOL.

D. Congressional Direction: The American Beef Labeling Act

Recognizing both consumer demand and trade realities, members of Congress from both parties have repeatedly introduced the American Beef Labeling Act [31] to direct USDA and USTR to develop a WTO-compliant pathway for reinstating MCOOL. Although the bill has not yet been enacted, its bipartisan sponsorship demonstrates strong and persistent momentum.

E. Sovereignty and Right to Labeling Standards

Trade agreements should not override the United States' sovereign right to establish fair labeling laws. Origin labeling is a legitimate consumer protection standard, akin to nutrition facts or allergen disclosures. It ensures transparency in the marketplace and allows U.S. farmers to compete on origin and quality. To argue otherwise is to privilege multinational packers' convenience over the rights of both producers and consumers.

F. Economic Context and the Cost of Inaction

The absence of MCOOL has contributed to increased consolidation and reliance on imports. In 2024, U.S. beef imports exceeded 4.6 billion pounds,[32] equivalent to 17% of U.S. beef production.[33] Without MCOOL, U.S. ranchers and hog farmers are unable to signal their domestic origin to consumers, leaving them vulnerable to global price shocks and foreign competition. By contrast, MCOOL would allow U.S. producers to capture consumer willingness-to-pay for U.S. origin, strengthening herd expansion.

G. Addressing Anticipated Criticisms

Industry opponents frequently raise the threat of retaliation as a reason MCOOL cannot be reinstated. However, the risk of retaliation stemmed from the design of the earlier law, not from origin labeling itself. A nondiscriminatory system that applies the same record-keeping and disclosure standards to both domestic and imported livestock can withstand WTO scrutiny. Concerns about administrative costs are also overstated. USDA already maintains extensive systems for animal identification, meat inspection, and product traceability; integrating origin labeling requirements into those existing frameworks can be accomplished efficiently, particularly as digital traceability tools become more widespread. Finally, claims that mandatory origin labeling would

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[30] Public Health Law Center, *United States – Measures Affecting the Production and Sale of Clove Cigarettes, World Trade Organization, Dispute Settlement DS406 (2014)*, available at https://www.publichealthlawcenter.org/litigation-tracker/united-states-measures-affecting-production-and-sale-clove-cigarettes-world.

[31] S.421 – 119th Congress (2025-2026): American Beef Labeling Act of 2025. (2025, February 5).,https://www.congress.gov/bill/119th-congress/senate-bill/421/text.

[32] Knight, R. (2025, May 22). *Cattle & Beef - Sector at a Glance*. Economic Research Service, U.S. Department of Agriculture, https://www.ers.usda.gov/topics/animal-products/cattle-beef/sector-at-a-glance.

[33] Knight, R. (2025, May 22). *Cattle & Beef - Statistics & Information*. Economic Research Service, U.S. Department of Agriculture, https://www.ers.usda.gov/topics/animal-products/cattle-beef/statistics-information.

confuse consumers run directly counter to the evidence. Polling consistently shows that Americans want to know where their food comes from, and clear, mandatory labeling reduces confusion rather than creates it. Taken together, these points demonstrate that the most common criticisms of MCOOL are either outdated or unfounded, and they should not deter USTR from pursuing reinstatement.

H. *Final Analysis*

The WTO dispute history should not be used as a shield against reform. With clear congressional direction, strong precedent for negotiated settlements, and overwhelming consumer demand, USTR has both the legal basis and political mandate to pursue reinstatement of MCOOL in the 2026 USMCA Joint Review. Doing so would reaffirm U.S. sovereignty, level the playing field for producers, and bring the trade system back into alignment with the public interest.

IV. Strategic Importance of the USMCA Review

The upcoming USMCA Joint Review is not a routine trade negotiation; it is a rare, treaty-mandated process that occurs only once every six years. This makes it one of the few guaranteed opportunities for the United States to reset its trade agenda and revisit commitments made under the agreement. For stakeholders like America's farmers, ranchers, and consumers, the review is therefore a pivotal moment to ensure that U.S. trade policy reflects domestic priorities rather than simply preserving the status quo.

Elevating MCOOL within the Joint Review process ensures the issue is not siloed as an agricultural matter but recognized as a core test of whether trade policy can deliver for working people. Just as negotiators have treated labor rights, environmental protections, and digital trade standards as central to the USMCA framework, MCOOL should be placed alongside these priorities. Doing so would not only strengthen the competitiveness of U.S. livestock producers but also rebuild public trust in trade governance by demonstrating that consumer transparency and farmer livelihoods carry equal weight with corporate interests.

The review also creates leverage: Canada and Mexico are motivated to maintain stability in the North American market, and the U.S. can use this moment to negotiate adjustments that accommodate MCOOL while preserving broader trade flows. By asserting MCOOL as a U.S. priority, the administration signals that consumer and producer interests are non-negotiable pillars of trade policy.

Finally, the timing is strategic. With the U.S. agricultural trade balance slipping into deficit and rural communities under strain, the absence of origin labeling sends the wrong signal. Making MCOOL a centerpiece of the Joint Review demonstrates that USTR is willing to use trade policy to strengthen domestic supply chains, restore consumer trust, and reassert sovereignty over how food is labeled and marketed within the United States.

V. Recommendations

A. *Establish Reinstatement of MCOOL as a Core Trade Objective*

Farm Action urges USTR to adopt the reinstatement of Mandatory Country of Origin Labeling (MCOOL) for beef and pork as a top U.S. trade priority in the 2026 USMCA Joint Review. Making MCOOL central to U.S. negotiating objectives will ensure that the issue is treated on equal footing with other core trade priorities, such as labor rights and environmental protections, and will demonstrate to producers and consumers alike that the United States is committed to transparency, fairness, and sovereignty in its food system.

B. Develop a WTO-Compliant Implementation Framework

We recommend that USTR, in close coordination with USDA, design and advance a framework for MCOOL. Congress has already signaled its expectation that a WTO-compliant pathway is achievable, most notably through the repeated introduction of the American Beef Labeling Act. USTR should treat this directive as a mandate to engage constructively with trading partners, develop the necessary regulatory adjustments, and deliver a labeling regime that is both durable under international law and responsive to the needs of U.S. producers and consumers.

C. Ensure Effective Communication, Oversight, and Review

For MCOOL to succeed, federal agencies must engage in clear communication with producers, consumers, and trading partners about both the necessity of origin labeling and the process for its implementation. USTR should also establish a process for regular monitoring and review to evaluate the rule's effectiveness in strengthening domestic markets and protecting consumer trust, while making timely adjustments in response to evolving market or trade conditions. By taking these steps, USTR will secure a transparent and resilient labeling system that reflects U.S. priorities and strengthens domestic agriculture for the long term.

V. Conclusion

The absence of mandatory country-of-origin labeling has left U.S. livestock producers competing in a marketplace that obscures origin, rewards consolidation, and denies consumers the transparency they overwhelmingly demand. Independent cattle and hog producers cannot thrive in a system where imported and domestic meat are indistinguishable, and consumers cannot make informed choices when origin information is hidden or inconsistently disclosed. The result is declining herds, shrinking farm numbers, and a food system increasingly dependent on foreign supply.

Reinstating MCOOL is therefore more than a labeling reform—it is a market-making, sovereignty-affirming policy that would restore integrity to our food supply, strengthen rural economies, and build resilience against global shocks. By providing a clear market signal, MCOOL would encourage herd expansion, reward producers for meeting higher U.S. standards, and keep food dollars circulating in American communities. For consumers, it would deliver the transparency and trust that are essential to rebuilding confidence in both the food system and in trade policy.

The 2026 USMCA Joint Review offers the optimal opportunity to resolve this issue once and for all with Canada and Mexico—the very countries that brought the original WTO complaint. Embedding an agreement on MCOOL into USMCA would effectively settle the dispute at its source, remove the risk of future WTO challenges, and create a durable framework for origin labeling across North America. By seizing this opportunity, USTR can both safeguard U.S. producers and reassure trading partners through a clear, negotiated solution.

We respectfully urge USTR to make reinstatement of MCOOL a top U.S. priority in the 2026 USMCA Joint Review. This process offers a rare and historic opportunity to align trade policy with the interests of American farmers and consumers, and to demonstrate that the United States will not compromise on transparency, fairness, or sovereignty in its food system.