



**Key Insights from the USMCA Review Process:
An Analysis of Business Feedback Submitted
through the USTR Comments Portal**

November 2025

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- Companies, business organizations, and other institutions may submit comments regarding the “operation” of the USMCA to the governments of the United States, Canada, and Mexico.
- **Monarch conducted an analysis of the submissions made to the U.S. government via the USTR portal.**
- From September 17, 2025, to October 27, 2025, a total of 499 comments had been registered — 119 of which include identifiable submitter names — averaging 12 comments per day.
- The deadline for submitting comments to the USTR is November 3, 2025.
- On the same portal, companies can apply to participate in the November 17 public hearing regarding the operation of the Agreement. Since the consultation period began, 12 companies have applied to participate.

Monarch conducted a **comprehensive review of all publicly available responses** submitted through the **USTR Comments Portal** regarding the United States–Mexico–Canada Agreement (**USMCA**). The objective of this analysis is to identify key themes, sectors, and stakeholder perspectives reflected in the submissions.

The review includes **119 responses with identifiable submitter names** and covers the following areas:

- 1. Referenced Chapters:** Identification of the USMCA chapters most frequently mentioned across comments.
- 2. Industry or Sector:** Classification of submissions by industry to highlight sector-specific interests and concerns.
- 3. Key Issues:** Analysis of recurring topics such as rules of origin, tariffs, non-tariff barriers, labor, and environmental standards.
- 4. Sentiment Analysis:** Evaluation of the overall tone and perception of the USMCA and of Mexico’s role in the agreement.

This structured approach provides insight into stakeholder priorities and areas where policy or enforcement discussions are most concentrated.

After analyzing all the comments made by the stakeholders, five clear comments in the document explicitly mention **the three countries or North American cooperation**.

All are **positive or constructive** toward maintaining or deepening the trilateral USMCA framework, with some proposing new collaborative mechanisms (e.g., NABIC) or emphasizing fair intra-regional trade.

#	Type of Comment	Trilateral Focus	Tone
1	General call for cooperation	U.S.–Mexico–Canada	Very positive
2	Agricultural policy integrity	U.S.–Mexico–Canada	Positive / protective
3	Proposal for new trilateral body (NABIC)	U.S.–Mexico–Canada	Positive / institutional
4	SME sector support	U.S.–Mexico–Canada	Very positive
5	Manufacturing supply chain	U.S.–Mexico–Canada	Positive

This summary compiles the main positive and negative stakeholder comments regarding the United States-Mexico-Canada Agreement (USMCA), specifically focused on **Rules of Origin, Tariffs, Market Access, and Energy**, based on the October 2025 public submissions. The synthesis highlights key issues and perspectives relevant for companies operating in North America, providing insight into potential regulatory, cost, and market risks that could shape future trade conditions

Positive Comments



1. Rules of Origin (ROO)

- Manufacturing integration benefits: some U.S. automotive and industrial stakeholders highlighted that USMCA rules of origin enabled duty-free movement of components across North America, supporting regional auto supply chains and protecting U.S. jobs.
- Manufacturers shifted production from Asia to Mexico due to North American ROO benefits, supplying U.S. Tier-1 auto producers.
- Regional Material Sourcing: support for provisions ensuring North American content for metals and other inputs, reinforcing predictable cost structures.



2. Tariffs

- Predictability & Zero-Tariff Trade: Small and mid-sized businesses emphasized that tariff-free trade in key goods (e.g., food products, manufacturing inputs) is essential for competitiveness and affordability.
- Competitive Position vs. Asia: Some comments argued the USMCA tariff-free framework helps North America compete against low-cost Asian imports.
- Opposition to New Tariffs: U.S. SMEs stressed that introducing tariffs on goods in duty-free sectors (e.g., food, components) would be financially devastating and could force closures.



3. Market Access

- Cross-Border SME Participation: U.S. small businesses emphasized that open access across borders supports the majority of SMEs engaged in North American trade (≈97% of cross-border traders are SMEs).
- Some stakeholders highlighted the potential for the USMCA to harmonize technical standards and reduce redundant certification requirements.
- A detailed proposal suggested creating a North American Border Infrastructure Commission (NABIC) under USMCA to coordinate permitting, logistics, and digital customs systems.
- A few small business respondents (especially in the food and manufacturing sectors) praised that current USMCA mechanisms keep NTBs relatively low between the U.S. and Canada, enabling seamless movement of inputs such as pet-food ingredients, aluminum cans, and packaging materials



4. Energy

- Clean-Energy Integration: Comments from the clean-tech sector stressed the importance of North American coordination for hydrogen and renewables supply chains.
- Industrial Energy Stability: U.S. manufacturers referenced USMCA's role in supporting regional energy-intensive industries (automotive, aluminum, etc.).

Negative Comments



1. Rules of Origin (ROO)

- Overly Restrictive Provisions (Textiles): U.S. textile producers criticized “fiber-forward” ROO rules, arguing they disqualify fabrics that use one specialty yarn not produced in North America.
- Requested shift: “Fiber-forward” → “Fabric-forward” to reflect modern sourcing realities and support regional competitiveness.



2. Tariffs

- Complaints About Mexico’s Import Costs: U.S. exporters reported high customs & VAT costs (≈25-30% customs + 16% VAT) on goods entering Mexico, claiming asymmetry vs. U.S. treatment of Mexican imports.



3. Market Access

- Non-Tariff Barriers (NTBs): U.S. equipment exporters reported duplicative testing and re-certification requirements in Mexico, labeling them barriers inconsistent with USMCA.
- Several exporters complained that Mexico’s certification rules, especially under NOM-003-SCFI-2014, require in-country testing and biannual inspections even for products already certified in the U.S.
- A U.S. supplier described Canada’s public procurement process as excessively bureaucratic and discriminatory, citing unreasonable documentation, security requirements, and bid clauses that favored domestic suppliers.



4. Energy

- Asymmetric Energy Policy Concerns: U.S. stakeholders asserted that Mexico’s energy policies favor state-owned enterprises, affecting competitiveness for private cross-border energy-using industries.

1. Listening to the Field

- Collecting comments from companies/organizations/institutions helps decision-makers understand the real challenges and opportunities U.S. firms face under current USMCA rules.

2. Mapping Industry Priorities

- Feedback reveals which sectors—such as agriculture, consumer goods, automotive—are most affected, helping guide negotiation priorities.

3. Anticipating Policy Shifts

- For U.S. manufacturers operating in Mexico, the analysis highlights potential changes in market access, rules of origin, labor standards, and tariff policies.

4. Strengthening Competitive Position

- Companies can use these insights to adjust supply chains, sourcing, and compliance strategies ahead of potential revisions to the agreement.

5. Shaping the Future Framework

- Active engagement enables U.S. industry to influence the next phase of North American integration, promoting growth and regional stability.



USTR Comments Portal

PUBLIC DOCKETS



This form times 119 (for each of comments with identifiable submitter names)

Submitter Information

<p>Submission ID USTR-2025-0004-00117990</p>	<p>Are you a third party, such as a law firm, trade association, or customs broker, submitting on behalf of an organization or industry? No</p>
<p>Organization Name [REDACTED]</p>	
<p>First Name [REDACTED]</p>	
<p>Last Name [REDACTED]</p>	

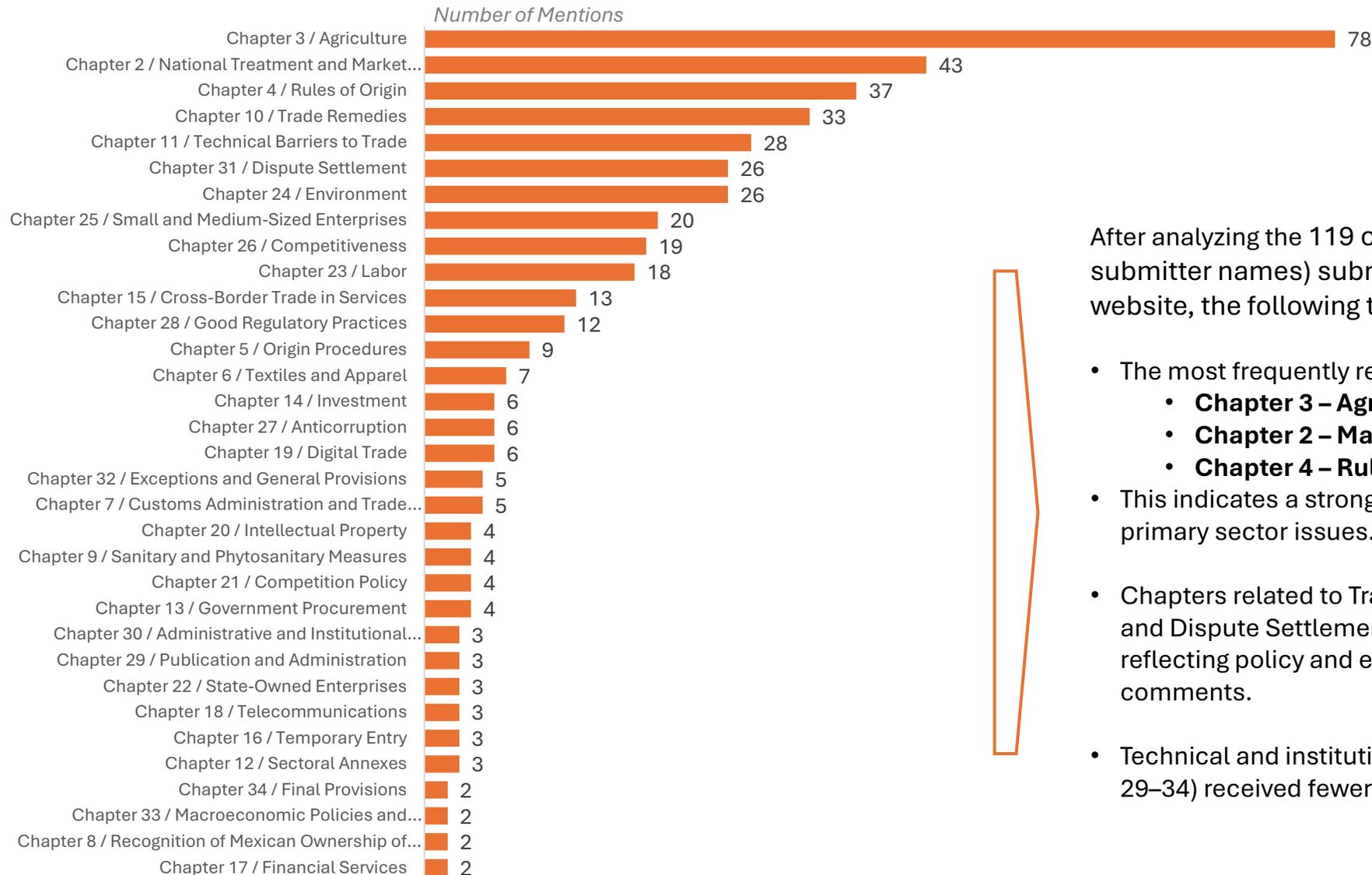
Public Attachments

📎
USTR-2025-0004-00117990-CAT-10763-Public Document
↓

Comments

1	Chapters	▶	<p>Please select the chapter(s) of the USMCA on which you are commenting.</p> <p>Chapter 3 (Agriculture);Chapter 4 (Rules of Origin);Chapter 7 (Customs Administration and Trade Facilitation);Chapter 11 (Technical Barriers to Trade);Chapter 15 (Cross-Border Trade in Services);Chapter 16 (Temporary Entry);Chapter 19 (Digital Trade);Chapter 23 (Labor);Chapter 25 (Small and Medium-Sized Enterprises);Chapter 26 (Competitiveness);Chapter 28 (Good Regulatory Practices);Chapter 31 (Dispute Settlement);Chapter 33 (Macroeconomic Policies and Exchange Rate Matters)</p>	▶	<p>The MGS team measured the frequency of <u>USMCA chapters</u> mentioned in the 119 comments (with identifiable submitter names) submitted through the USTR website.</p>
2	Industry / Sector(s)	▶	<p>Please select the industry or sector(s) on which you are commenting.</p> <p>Agriculture; Other;Automotive;Consumer Goods;Digital Services;Energy and Basic Petrochemicals;Information and Communication Technologies (ICT);Professional Services;Supply Chain Services;Other</p>	▶	<p>The MGS team measured the frequency of the <u>industry / sector(s)</u> referenced in the 119 comments (with identifiable submitter names) submitted through the USTR website.</p>
3	Issues	▶	<p>Please select the issue(s) which on which you are commenting.</p> <p>Agriculture;Border Tax;Competitiveness;Customs and Trade Facilitation;Digital Trade;Dispute Settlement and Enforcement;Environment;Regulatory Practices;Rules of Origin;Services;Small and Medium Enterprises;Temporary Entry;Other</p>	▶	<p>The MGS team measured the frequency of “<u>issues</u>” mentioned in the 119 comments (with identifiable submitter names) submitted through the USTR website.</p>
4	General Comments	▶	<p>Please enter the Harmonized Tariff Schedule code(s), if any, on which you are commenting.</p> <p>Enter general comments or click "next" to proceed to upload attachments.</p>	▶	<p>The MGS team assessed <u>sentiment</u> (positive, negative, or neutral) toward the USMCA and Mexico for each general comment reviewed.</p>

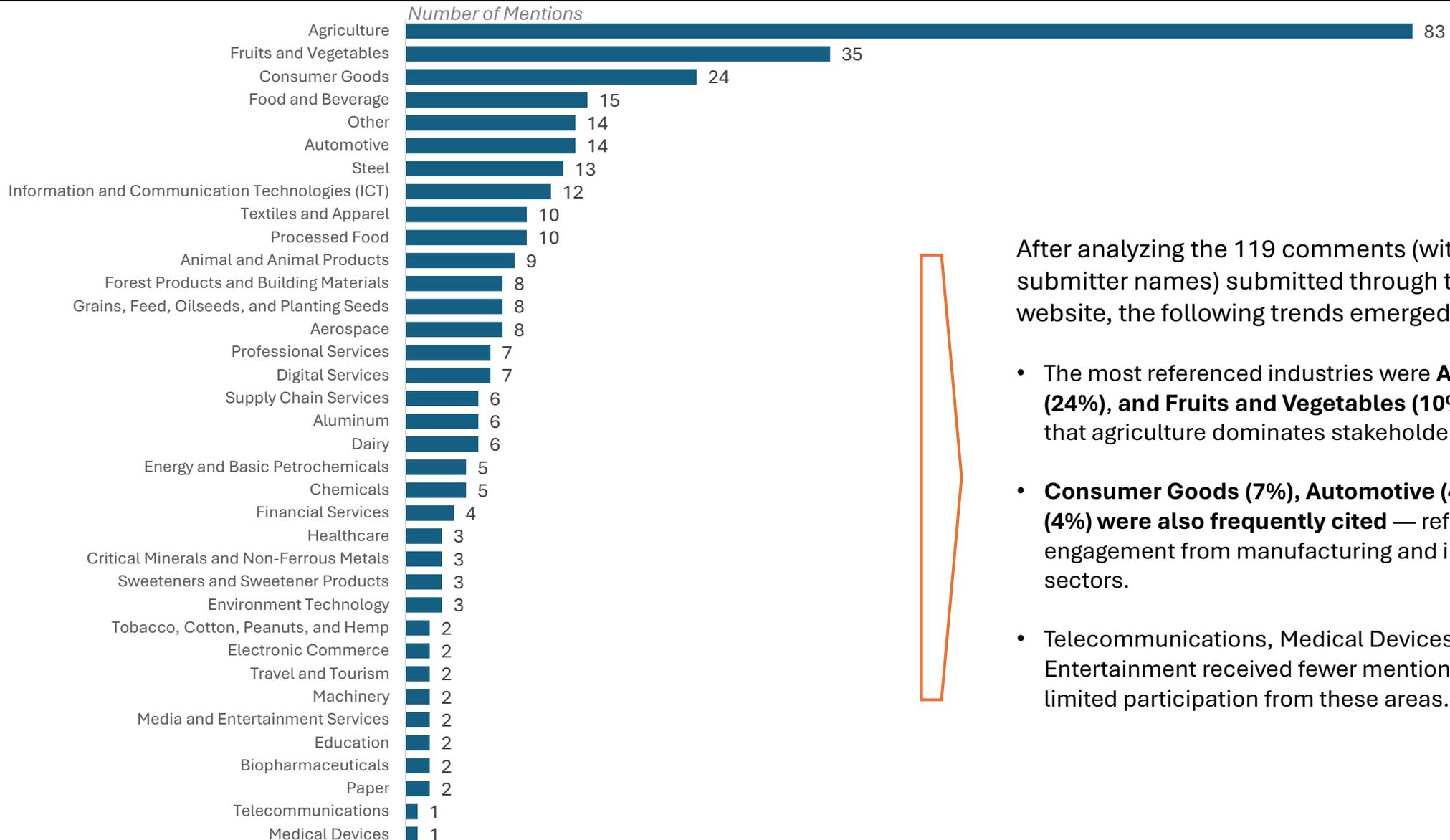
/ USMCA Chapters Most Frequently Mentioned in Comments



After analyzing the 119 comments (with identifiable submitter names) submitted through the USTR website, the following trends emerged:

- The most frequently referenced chapters were:
 - **Chapter 3 – Agriculture (18%)**
 - **Chapter 2 – Market Access (10%)**
 - **Chapter 4 – Rules of Origin (8%)**
- This indicates a strong focus on trade in goods and primary sector issues.
- Chapters related to Trade Remedies, Environment, and Dispute Settlement were also commonly cited, reflecting policy and enforcement priorities in the comments.
- Technical and institutional chapters (e.g., Chapters 29–34) received fewer mentions.

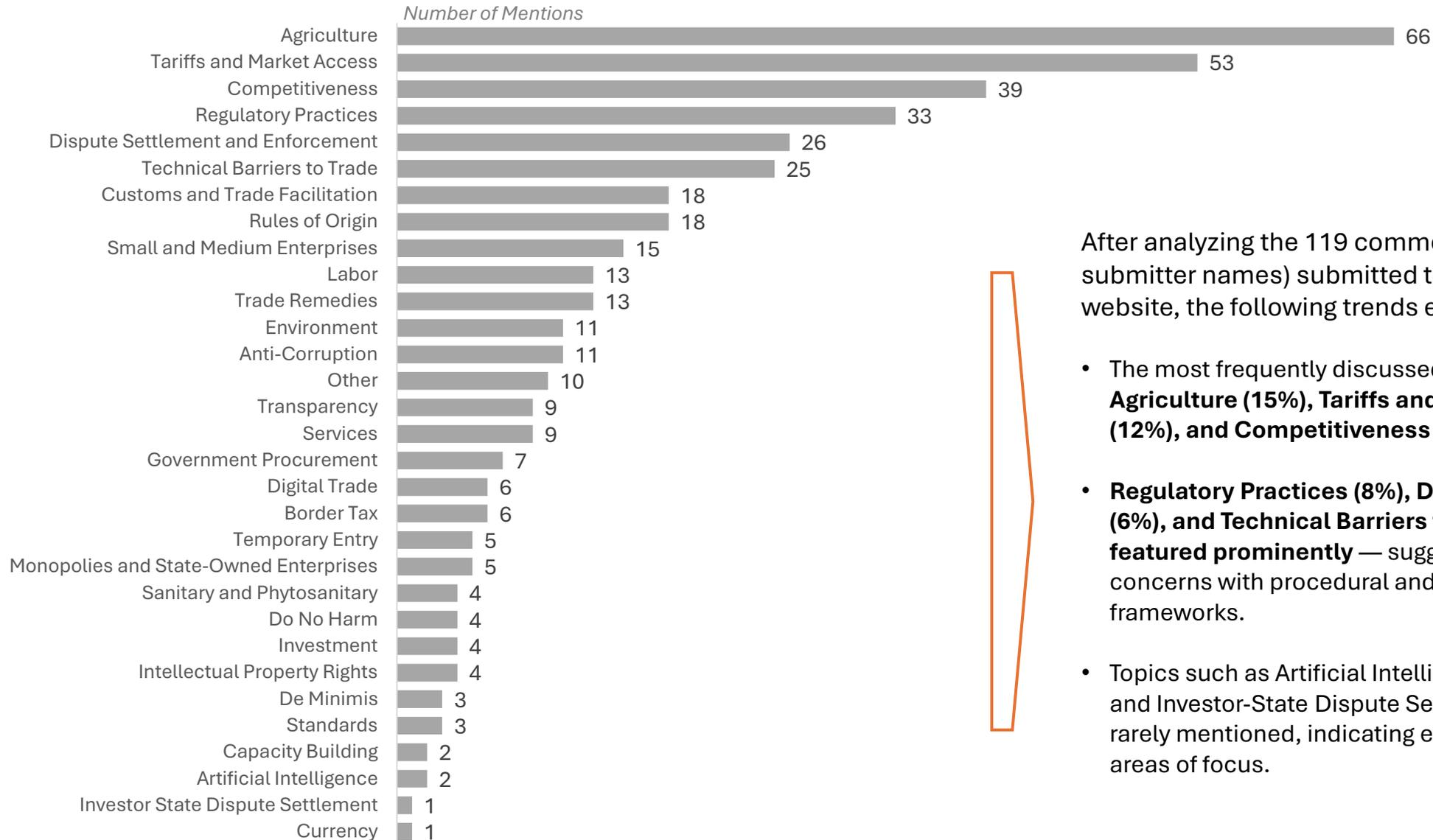
/ Industries or Sectors Most Frequently Mentioned in Comments



After analyzing the 119 comments (with identifiable submitter names) submitted through the USTR website, the following trends emerged:

- The most referenced industries were **Agriculture (24%)**, and **Fruits and Vegetables (10%)**, indicating that agriculture dominates stakeholder attention.
- **Consumer Goods (7%)**, **Automotive (4%)**, and **Steel (4%)** were also frequently cited — reflecting strong engagement from manufacturing and industrial sectors.
- Telecommunications, Medical Devices, and Media & Entertainment received fewer mentions, suggesting limited participation from these areas.

/ Key Issues Most Frequently Mentioned in Comments



After analyzing the 119 comments (with identifiable submitter names) submitted through the USTR website, the following trends emerged:

- The most frequently discussed issues were **Agriculture (15%), Tariffs and Market Access (12%), and Competitiveness (9%)**.
- **Regulatory Practices (8%), Dispute Settlement (6%), and Technical Barriers to Trade (6%) also featured prominently** — suggesting frequent concerns with procedural and compliance frameworks.
- Topics such as Artificial Intelligence (AI), Currency, and Investor-State Dispute Settlement (ISDS) were rarely mentioned, indicating emerging but limited areas of focus.

- Monarch analyzed the sentiment (positive, negative, or neutral) expressed in the 119 comments submitted through the USTR portal regarding the USMCA.

Sentiment	Count	Share
Negative	37	66%
Positive	8	14%
Neutral	11	20%

- **Negative sentiment (~66%) dominates, reflecting frustration that the USMCA does not adequately protect U.S. producers from import competition or enforce water/labor standards.**
- Positive sentiment (~14%) highlights the stability and benefits of the USMCA for manufacturing, small businesses, and cross-border supply chains.
- Neutral sentiment (~20%) consists mainly of technical or procedural recommendations related to rules of origin, labor provisions, and enforcement mechanisms.
- **Note:** According to the Marketing Science Institute, when feedback is voluntary or open-ended, one can expect the majority (~70%) of comments to be negative or critical — not because most participants are unhappy, but because unhappy ones are more motivated to speak.

- Monarch analyzed the sentiment (positive, negative, or neutral) expressed toward Mexico in the 119 comments submitted through the USTR portal.

Sentiment	Count	Share
Negative	43	77%
Positive	6	11%
Neutral	7	12%

- **Predominantly Negative (≈77%)** — Most comments express frustration with Mexico’s trade practices, particularly regarding noncompliance with water treaty obligations, agricultural import issues, and Mexico’s resistance to Mandatory Country of Origin Labeling (MCOOL).
- Positive (≈11%) — A small share of respondents recognize trade benefits or mutually advantageous tariff-free cooperation with Mexico.
- Neutral (≈12%) — Focused on technical, labor, or policy recommendations without taking a direct position on Mexico.
- **Note:** According to the Marketing Science Institute, when feedback is voluntary or open-ended, one can expect the majority (≈70%) of comments to be negative or critical — not because most participants are unhappy, but because unhappy ones are more motivated to speak.

1. Conduct an Internal USMCA Impact Review

Evaluate how current and potential changes in rules of origin, labor provisions, and tariff structures could affect your production processes and cost bases.

- Map each manufacturing input's origin and value contribution.
- Identify small adjustments that could strengthen compliance or improve cost efficiency.
- Use scenario planning to estimate the impact of potential tariff or regulatory shifts.

2. Align Supply Chain Strategy with Anticipated Negotiation Focus

The feedback trends suggest an emphasis on agriculture, consumer goods, and automotive sectors.

- Strengthen partnerships with local and regional suppliers to increase North American content.
- Explore dual sourcing or nearshoring within the region to reduce exposure to future policy risks.
- Ensure traceability systems are in place to quickly demonstrate compliance under new origin or labor rules.

3. Engage Proactively in the Consultation Process

Stay connected to the USTR public comment process, chambers of commerce, and binational industry groups.

- Provide data-driven feedback on the practical impacts of USMCA implementation.
- Collaborate with other firms to present unified positions on key manufacturing and logistics issues.

4. Invest in Compliance and Workforce Readiness

Anticipate greater scrutiny on labor standards and environmental practices.

- Audit facilities in Mexico to ensure alignment with USMCA labor and environmental requirements.
- Develop training programs and communication strategies to reinforce compliance culture.

5. Position the Company for Regional Competitiveness

Build long-term resilience and agility in the North American market.

- Prioritize innovation, automation, and digital trade readiness in manufacturing operations.
- Monitor potential fiscal or energy policy changes in Mexico that could affect cost structures.
- Use insights from this analysis to advocate for policies that support balanced regional growth.

MGS can help support your business with:

- Continuous monitoring of USMCA negotiation developments.
- Ongoing scenario planning for tariff or content rule changes.
- Trade intelligence to assess financial impacts and pricing strategies.
- Stakeholder engagement with experts in trade, economics, and legal aspects of the USMCA.

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Appendix

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- The comments submitted by companies/institutions/organizations in the United States reflect their individual perspectives and interests, not the official position of the U.S. government.
- These comments are part of a public consultation process and serve to inform, but not necessarily to determine, the government's final stance in the USMCA review or negotiations.
- The U.S. government may also collect feedback and input through other non-public channels, including direct consultations, industry associations, and interagency discussions.
- Therefore, the publicly available comments may not fully capture the range or balance of views influencing U.S. trade policy decisions.
- Any interpretation of the comments should be made with caution, acknowledging that they are advisory in nature and not binding on U.S. policy outcomes.
- Regardless of the above, the MGS team believes that this analysis provides valuable insights for manufacturing companies from the United States, Canada, and Mexico operating in Mexico.
- If required, the MGS team can share the compiled database containing the specific responses from each company/organization/institution. All information is public, but it is not necessarily organized in an easy-to-consult database.

- **Mexico:** It is not expected that the Mexican government will make company, organization, or institutional submissions publicly available.
 - If such information becomes accessible, the MGS team will conduct the same analysis applied to the U.S. data.
- **Canada:** If the Canadian government publishes its consultation responses, the MGS team will likewise perform the same analytical process used for the U.S. submissions.

- A total of **119 responses were analyzed out of 499 public comments** available on the USTR portal.
- Using a standard statistical approach, this sample size yields a **margin of error of approximately ±7% at a 95% confidence level.**
 - In practical terms, this means **the findings can be considered a reliable reflection of the broader set of comments**, with results expected to differ by no more than seven percentage points from what would be obtained if all 499 comments were reviewed.
- Given the high coverage ratio and balanced representation across sectors and comment types, **the sample offers a robust and credible basis** for identifying the main themes, sentiments, and policy priorities expressed by stakeholders regarding the USMCA.

1. General Support for Trilateral Cooperation

“Our trade block in the Americas is critical to our world standing. We cannot treat our neighbors with hostility and expect to have thriving economies. The importance of this trade agreement will be felt for years to come. We need to be strategic and thoughtful of the future of all three countries. Those of us who live along the border know how important our relationships are. We are all human beings, and we need each other.”

→ Comment type: Broad statement supporting trilateral (U.S.–Mexico–Canada) cooperation and mutual economic integration under the USMCA.

2. Limiting Benefits to Members (U.S., Mexico, Canada)

“We are supportive of the U.S. working with Canada and Mexico to enhance our mutual agricultural base. We are not supportive of the U.S., Canada or Mexico acting as transit stages... Non-member countries should not enjoy the benefits without the obligations of the trade agreement.”

→ Comment type: Explicit reference to trilateral coordination; calls for limiting USMCA benefits only to the three members.

3. Proposal for a Trilateral Border Infrastructure Commission

“We propose the creation of a North American Border Infrastructure Commission (NABIC) under the USMCA framework... With equal representation from the U.S., Mexico, and Canada, NABIC would modernize border management and ensure that North America’s borders remain gateways to growth, competitiveness, safety and resilience.”

→ Comment type: Policy proposal directly addressing trilateral governance and coordination.

4. Support for USMCA Renewal Across North America

“The USMCA has created an environment of stability, predictability, and trust that has allowed North American businesses to innovate, invest, and grow... We urge the Administration and the U.S. Trade Representative to preserve and extend USMCA for another 16 years — and to continue promoting open, tariff-free trade between the United States, Canada, and Mexico.”

→ Comment type: Direct reference to trilateral agreement renewal and its benefits for small firms.

5. North American Supply Chains

“The agreement’s trade framework has allowed companies like ours to source aluminum efficiently from within North America while exporting finished products competitively to Mexico and Canada... Maintaining low barriers for U.S. exports to Canada and Mexico will strengthen the entire manufacturing ecosystem.”

→ Comment type: U.S. manufacturer highlighting trilateral value chains.

