204 Hawley St
Lynden, WA 98264
tel 360-354-8767
fax 360-354-0948
www.redrazz.org
info@redrazz.org

November 3, 2025

The Honorable Jamieson Greer
Office of the United States Trade Representative
600 17th St. NW
Washington, DC 20006

Re: **Docket No. USTR-2025-0004:** 'Request for Public Comments and Notice of Public Hearing Relating to the Operation of the Agreement Between the United States of America, the United Mexican States, and Canada'

Dear Ambassador Greer:

The Washington Red Raspberry Commission (WRRC) was formed in 1976 to support and promote the raspberry industry, as the U.S. processed raspberry industry is based primarily in Washington State. There are approximately sixty farms that comprise the WRRC, each committed to growing, harvesting, and processing the highest quality berries in the world while meeting the most stringent quality standards. We appreciate the opportunity to provide comments on the upcoming review of the United States-Mexico-Canada Agreement (USMCA).

As you know, the United States (U.S.) is on track to experience a record agricultural trade deficit in fiscal year 2025–estimated at $49 billion—driven by rising imports and weakening exports. For Washington's berry growers, volatile markets and an influx of low-cost imported fruit, coupled with escalating production expenses, are making it increasingly difficult to remain competitive. The Washington raspberry sector has faced mounting pressure from imports of both processed raspberry products and fresh berries destined for processing. As a result, domestic prices have significantly declined. Since 2019, raspberry production costs have climbed substantially, but wholesale prices have failed to keep pace – largely due to the growing volume of Mexican imports during that period.

These imported raspberries are a by-product of the Mexican fresh market and are severely undermining the U.S. raspberry market by flooding it with large volumes of fruit precisely when domestic growers are bringing their own berries to market. This surge of imports drives down overall market prices and returns for American farmers and risks driving U.S. producers out of business. Additionally, there are numerous examples of previously reliable customers reducing or stopping their order from U.S. companies and instead choosing to purchase low-cost frozen red raspberries imported from Mexico. Washington growers rely on strong sales to cover rising labor, packaging, and input expenses. The volume and pricing of these Mexican shipments effectively undercuts U.S. producers, creating an uneven playing field that threatens the long-term viability of the domestic raspberry industry.

Mexican imports typically undercut the prices of U.S.-grown raspberries by 40% or more. Further, since these berries are a by-product of the fresh industry and were historically left in the field or sent to a landfill, they have no effective price floor. As such, any attempts by U.S. growers to match Mexican prices are met by further discounts on imported fruit. For the 2025 harvest season, Washington raspberries are being offered in the U.S. market at $2.70-2.80 per pound, while Mexican raspberries are being offered at $1.50 per pound, well below the cost of production in Washington. Mexican producers benefit from substantially lower labor costs—often a fraction of U.S. wage rates—as well as reduced regulatory and environmental compliance expenses. With strong support for export infrastructure and favorable trade conditions under the current USMCA, Mexican suppliers can move large volumes of raspberries into the U.S. market at minimal expense.

At the request of U.S. Trade Representative Robert Lighthizer, the U.S. International Trade Commission (ITC) conducted a Section 332 investigation for raspberries in 2021, examining the conditions of competition between U.S. and foreign growers. The results of that investigation are outlined in the ITC publication titled "Raspberries for Processing: Conditions of Competition between U.S. and Foreign Suppliers, with a Focus on Washington State." According to this report, between 2015 and 2020, the U.S. imported fresh and processed raspberries primarily from four countries: Mexico, Chile, Serbia, and Canada. During this period, Mexico emerged as the leading supplier of fresh raspberries for processing, largely due to its geographic proximity and favorable trade conditions. In contrast, Canada supplied the highest volume of frozen mixed berries to the U.S. in 2020, reflecting strong consumer demand for these products. That same year, Mexico's processing industry ed 9,910 metric tons of frozen raspberries—including individually quick frozen (IQF), straight pack, and puree products—to the U.S., its top export market. Mexico also shipped 92,443 metric tons of fresh raspberries to the United States in 2020, far surpassing the volumes exported to other countries. Comparative figures are provided in Tables 5.2 and 5.3 below.

Table 5.2 Mexico: Exports of frozen raspberries by destination market, 2015–20

In metric tons (mt) and percentages. n.c.= not calculable.

Market	2015 (mt)	2016 (mt)	2017 (mt)	2018 (mt)	2019 (mt)	2020 (mt)	Absolute change 2015–20 (mt)	Percent change 2015–20
United States	9,561	8,152	5,389	7,526	7,877	9,910	348	3.6
Canada	2,661	1,374	1,453	2,489	1,446	5,119	2,459	92.4
China	0	0	1	95	0	0	0	n.c.
Chile	762	735	0	48	0	0	−762	n.c.
Brazil	35	0	0	9	0	0	−35	n.c.
All other	1,152	1,687	98	6	0	0	−1,152	n.c.
All destination markets	14,172	11,948	6,940	10,173	9,323	15,029	857	6.0

Source: IHS Markit, Global Trade Atlas, HS 0811.20, accessed March 16, 2021.

Note: HS code 0811.20 covers raspberries, blackberries, mulberries, loganberries, currants, and gooseberries. However, available information indicates that the bulk of exports of this product group are raspberries.

Table 5.3 Mexico: Exports of fresh raspberries by destination market, 2015–20

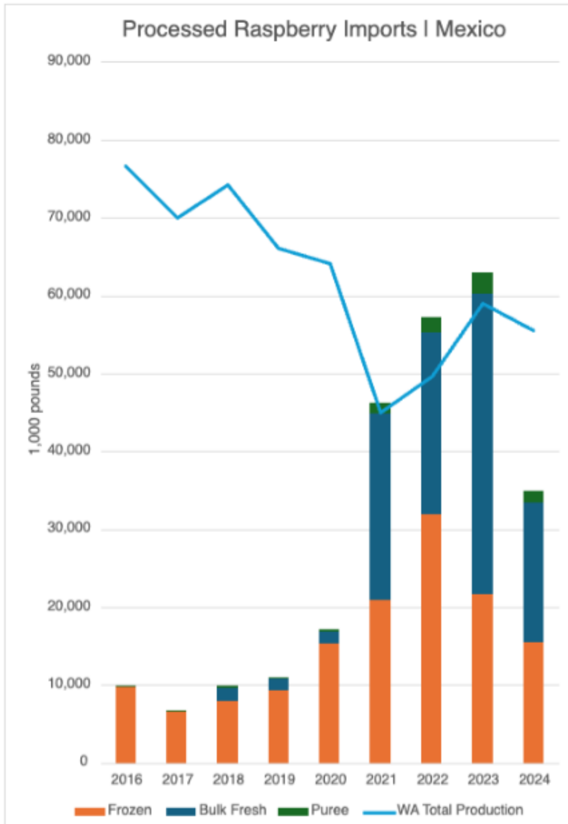
In metric tons (mt) and percentages.

Market	2015 (mt)	2016 (mt)	2017 (mt)	2018 (mt)	2019 (mt)	2020 (mt)	Absolute change 2015–20 (mt)	Percent change 2015–20
United States	67,232	71,787	72,574	81,194	95,200	92,443	25,211	37.5
United Kingdom	962	827	948	2,047	1,125	850	−112	−11.6
Netherlands	509	531	518	713	476	395	−114	−22.4
Italy	646	682	763	831	508	379	−267	−41.4
Canada	56	246	370	339	13	288	232	411.7
All other	1,492	1,523	1,777	1,866	525	517	−975	−65.4
All destination markets	70,897	75,597	76,951	86,990	97,847	94,872	23,975	33.8

Source: IHS Markit, Global Trade Atlas, HS 0810.20, accessed March 16, 2021.

Note: HS 0810.20 covers raspberries, blackberries, mulberries, and loganberries. The United States imported 76,732 mt of fresh blackberries from Mexico in 2019. USITC DataWeb/Census, HTS 0810.20.9030, fresh blackberries, accessed February 12, 2021.

Mexican raspberry imports have increased even more sharply since 2020, coinciding with a period of escalating production costs for domestic producers. As a result, Mexico has been able to expand its presence in the U.S. market, supplying raspberry products at prices American growers cannot match. During this same period, Washington's total raspberry production has declined, reflecting the growing pressure placed on U.S. producers by lower-cost imports from Mexico. Comparative figures with types of imports from Mexico and total Washington production are provided below.



In light of these continued challenges with Mexico, we strongly support the implementation of tariffs and other trade measures on imported Mexican raspberries and raspberry products. Considering our industry's situation during the upcoming USMCA review will be critical in ensuring that U.S. grower can compete on a fair and level playing field. We must protect U.S. growers against other countries, such as Mexico, competing unfairly. We also wish to acknowledge and thank USTR and President Trump for their prior attention to this issue, including efforts to protect U.S. specialty crop growers during the original USMCA negotiations and the comprehensive raspberry investigation conducted by USTR and the ITC in 2021. As USTR prepares for the upcoming USMCA review, we respectfully encourage renewed consideration of policy solutions to support American raspberry growers. While there may be no single solution to the current trade imbalance, we are open to a range of approaches—including the establishment of import quotas—to provide meaningful relief to Washington's raspberry producers. Protecting the competitiveness and long-term viability of the U.S. raspberry industry is essential to the strength and sustainability of American agriculture.

Also pertinent for consideration during the USMCA review, Canada is a major trading partner for the U.S. raspberry and frozen berry market. Canada holds a strong position in purchasing from the U.S., supported by favorable exchanges rates and export incentives. Trade with Canada is more balanced than with Mexico, and U.S. raspberry growers support the current relationship under USMCA. We encourage USTR to consider our support of the current trade terms with Canada, particularly in the frozen and processed product sectors.

If we can provide any additional data or anecdotal information, please contact Robert Redding at RLRedding@reddingfirm.com or 202-543-7464.

Respectfully,

Mark Van Mersbergen
Raspberry Grower
WRRC President

Brad Rader
Raspberry Grower & Processor
WRRC Board Member

Gavin Willis
WRRC Executive Director
gavin@redrazz.org