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Final Pre-Hearing Submission to the Office of the U.S. Trade Representative:

Section 301 Brazil Investigation. Proposed Action Hearing

Bill Bullard, CEO
R-CALF USA (Ranchers Cattlemen Action Legal Fund United Stockgrowers of America)
July 6, 2026

R-CALF USA is a national, non-profit trade association representing approximately 4,000 U.S. cattle farmers and ranchers and sheep producers in 42 states. It is the largest producer-only trade association representing the U.S. cattle industry. R-CALF USA represents its members in trade and marketing matters and works to sustain the profitability and viability of their U.S. cattle and sheep operations, which are vital to the wellbeing of America's rural economy. R-CALF USA's membership consists of independent cow-calf operators, cattle backgrounders and stockers, cattle and sheep feedlot owners, and sheep producers. Various main street businesses are associate members of R-CALF USA.

R-CALF USA agrees with the United States Trade Representative's (Trade Representative's) determination that certain of Brazil's acts, policies, and practices at issue in the above captioned investigation are actionable under Section 301(b) and Section 304(a) of the Trade Act of 1974, as amended (Trade Act). R-CALF USA further agrees that the Trade Representative's proposed determination that action is appropriate and that appropriate action would include applying tariffs of 25% on all goods of Brazil, with exemptions for certain goods, is generally appropriate; but with the critically important exception that beef products identified in the Annex should not be exempted from the tariff application.[1]

A. Tariffs on Brazilian Beef Are Needed to Reduce or Eliminate Illegal Deforestation in Brazil

The Trade Representative's investigation expressly identified a direct nexus between Brazilian ranching, cattle, and beef and illegal deforestation, with respect to which Brazil's acts, policies, and practices were found to be unreasonable and burden or restrict U.S. commerce and, therefore, actionable. Citing a 2024 study, the investigation determined that Brazil's policies failed to adequately prevent illegal ranching, and deforestation.[2] The investigation further implicated Brazilian cattle ranching as a primary impetus for deforestation, citing the conversion of forest to pastureland for cattle

[1] The Annex at 91 Fed. Reg., 33,862-33,863 identifies numerous beef products with HTSUS codes 020110-020230; 020610-020629; 021020; and 160250, inclusive of bovine carcasses, meat cuts, high-quality meat cuts, offal, tongues, and livers, processed beef, and cured beef.
[2] *See* 91 Fed. Reg., at 33,858.

as the initial stage of the deforestation process; and citing Brazilian cattle ranchers' desire to continue expanding production as further motivation to cut down more primary forest as the deforestation process's final stage.[3]

Indeed, the investigation cited the estimate that since 2001, over 90% of Brazil's deforestation (legal and illegal) is attributable to the conversion of primary forest to agricultural production, and "between 2018 and 2022, cattle ranching drove 78% of commodity-attributed deforestation."[4]

The investigation proceeds by explaining that without effective enforcement of environmental laws, Brazilian ranchers may launder cattle raised illegally on deforested land by transferring them to legitimate slaughterhouses. Compounding this illicit cattle laundering vector is the Trade Representative's knowledge that Brazilian ranchers are known to bribe government officials to hide their illicit deforestation-related activities.[5] In 2023, after a two-year investigation, the U.S. Senate Committee on Finance likewise found a direct nexus between Brazilian ranching and illegal deforestation.[6]

Upon the establishment of such a direct and prominent, if not the primary link between Brazilian cattle ranching and Brazil's illegal deforestation, exempting the principal derivative of cattle, i.e., beef, from the proposed 25% tariff action would substantively undermine the Trade Representative's objective of eliminating the improper acts, policies, or practices contributing to illegal deforestation in Brazil.

B. Brazilian Beef Products Should Be Removed from the Annex's List of Exemptions

The Trade Representative's investigation presents an opportunity to eliminate Brazil's illegal deforestation while simultaneously protecting America's cattle ranchers from artificially lower-cost Brazilian beef sourced from illegally deforested lands, which undermines their competitiveness and substantially contributes to the ongoing contraction of their industry.

Presumptively, the Trade Representative understands that Brazilian cattle ranching is a primary catalyst, if not the primary catalyst driving illegal deforestation in Brazil. However, it appears the Trade Representative has decided to forego the remedial effect a beef tariff would have on Brazil based on a belief that Brazilian beef meets one or more of the conditional criteria for exemption listed in the proposed action.[7]

With respect to beef, the last of the four conditional criteria for exemption addresses the efficacy of tariffs to encourage Brazil to reduce or eliminate illegal deforestation. The presumptive operating theory underpinning the proposal to apply tariffs on other Brazilian goods is that tariffs would frustrate Brazil's economic objectives, causing it to change its specific acts, policies, and practices that led to the tariff's imposition. There is nothing peculiar about beef – the derivative of cattle and, therefore, the catalyst of illegal deforestation – to suggest that beef tariffs would not frustrate Brazil's beef export objectives any more or less than tariffs on all the other Brazilian goods contemplated under the

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[3] *See id*.
[4] *Id*.
[5] *See id*.
[6] *See* Wyden Hearing Statement on Cattle Supply Chains, Amazon Deforestation, U.S. Senate Finance Committee, June 22, 2023, available at [2023-06-22] Wyden Hearing Statement on Cattle Supply Chains, Amazon Deforestation | The United States Senate Committee on Finance.
[7] *See id*., at 33,861.

proposal would frustrate Brazil's other economic objectives and lead to the elimination of those acts, policies, and practices the Trade Representative found actionable. Indeed, exempting beef from the proposed 25% tariff would substantially thwart the Trade Representative's efforts to reduce or eliminate Brazil's illegal deforestation as well as some of the Trade Representative's other actionable findings, including the finding that Brazil does not properly conduct anti-corruption enforcement.[8] For this commonsense reason, a tariff on Brazilian beef should be expected to contribute substantially to the elimination of Brazil's acts, policies, and practices that allow illicit deforestation to persist.

The first three conditional criteria relate to whether the United States is dependent on the Brazilian goods potentially subject to the proposed tariff, and whether tariffs on those goods would cause harm to the U.S. should the tariffs reduce or deprive the U.S. of those goods. With respect to beef, and as demonstrated below, the U.S. economy is reeling from decades of failed trade policies that have facilitated the penetration of excessive beef and cattle imports into the United States.[9] These excessive imports have substantially displaced domestic beef production;[10] substantially contributed to the long-term dismantling of the U.S. cattle industry's competitive infrastructure: its participants and herd size,[11] intermediary marketing outlets (feedlots),[12] and major beef packers;[13] substantially contributed to the disconnect between domestic cattle prices and retail beef prices (as evidenced by the recent, multi-year period when beef prices were reaching new highs and cattle prices were trending downward);[14] substantially contributed to the hollowing out of Rural America; and substantially contributed to supply chain disruptions.

In recent years, Brazilian beef imports have increased substantially, and those imports are playing an ever-increasing role in relegating the United States increasingly dependent on foreign countries for one of its most important protein sources – beef, which is antithetical to national security.

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[8] *See id*., at 33,858 (discussing bribery of government officials by ranchers in Brazil).
[9] *See* Beef: Supply and disappearance (carcass weight, million pounds) and per capita disappearance (pounds), USDA ERS (showing import penetration has increased over 150% from 1980 to 2025), available at Livestock and Meat Domestic Data | Economic Research Service.
[10] *See id*., (showing that commercial domestic beef production in 2025 was the lowest since 2017 while 2025 total disappearances – a proxy for domestic consumption – was the highest since the USDA-ERS began keeping records in 1970), available at Livestock and Meat Domestic Data | Economic Research Service.
[11] *See, e.g.,* USDA Plan to Fortify the Beef Industry: Strengthening Ranches, Rebuilding Capacity and Lowering Costs for Consumers, USDA (explaining that since 2017, the U.S. has lost 17% (over 150,000) of its cattle ranching operations and the national herd is at a 75-year low), available at FINAL 10.20.2025 - USDA Beef Industry Plan White Paper.
[12] *See, e.g*., various USDA-NASS Cattle on Feed reports (showing that since 1996, the U.S. has lost over 77% (86,004) of its cattle feedlots).
[13] *See* What Tyson beef plant closure means for cattle producers, Elliott Dennis and T. Jake Smith, University of Nebraska Lincoln, Beef, Dec. 18, 2025 (explaining that Tyson was closing its 5,000 head per day slaughtering plant in Lexington, Ne., and this was the first time one of the "Big Four" beef packers had closed a plant during the current cattle supply shortage), available at What Tyson beef plant closure means for cattle producers; *see also* JBS Announces Closure of Pennsylvania Beef Processing Facility, Angie Stump Denton, Drovers, June 12, 2026, (explaining that JBS is closing its 2,000 head per day slaughtering plant in Souderton, Pa.), available at JBS Announces Closure of Pennsylvania Beef Processing Facility - Drovers; *see also* USDA-AMS Packers and Stockyards Program 2013 Annual Report (stating that Cargill closed its beef packing plant in Plainview, Tx., at 32 (representing the start of the "Big Four's" plant closures during the tight cattle supply situation), available at Packers and Stockyards Annual Report; *see also* The U.S. Beef Supply Chain: Issues and Challenges, a workshop on cattle markets by Texas A&M Agricultural and Food Policy Center, 2021, at 31 ("The reduction in packing capacity – combined with the cyclical herd expansion from 2014 to 2019 – resulted, for the first time in more than 35 years, in a shortage of cattle packing capacity."), available at cattle.pdf.
[14] *See infra*, Chart 2.

C. Not Delimiting the Ongoing Importation of Brazilian Beef Will Harm the United States

To demonstrate why it is wrong to presume that delimiting the ongoing importation of Brazilian beef would in any way be harmful to the United States – indeed, why the opposite is true, the role of beef and cattle imports – including Brazilian beef's escalating role in recent years, in the decades-long contraction of the U.S. cattle industry's beef cow inventory requires careful analysis.

As shown in Chart 1 below, the U.S. beef cow inventory has trended downward since peaking in 1982, though there were several periods of expansions and liquidations during this overall downturn. Together, the periods of expansion and liquidation of the cow herd inventory are known as the cattle cycle, [15] and each complete cycle can be measured between each inventory peak or low.[16] Historically, the cow herd inventory expands when cattle prices are favorable and liquidates when they are not. In essence, the cattle cycle is a historical phenomenon representing the industry's collective adjustments to balance domestic cattle supplies with beef demand and it is influenced by the long biological cycle of cattle. Cattle price trends serve as a proxy for the relative balance between supply and demand. When prices trend upward, it signals to ranchers the need to expand the cow herd, and vice versa.

There were three complete cattle cycles between 1982 and 2018. The U.S. cow herd is presently in a prolonged liquidation phase within the current uncompleted cycle that has so far persisted for seven years since the latest peak in 2018. This liquidation phase, as well as each preceding liquidation phase depicted in the chart, is abnormal as the liquidation phase of the cattle cycle is typically expected to last only three to four years.[17]

Because imported beef and cattle are direct product substitutes for domestic beef and cattle, changes in the volume of beef and cattle imports entering the U.S. influence domestic supply, which in turn influence domestic cattle prices and, hence, the cattle cycle. As Chart 1 shows, import volumes have increased by more than 150% since 1980. The chart shows that each liquidation phase of each cattle cycle since 1996 was preceded by a marked increase in the volume of imports. Also evidenced by the chart is the fact that each successive inventory peak in each cattle cycle since 1982 was lower than the preceding cycle's peak, resulting in a long-term, downward trending beef cow inventory that is now historically low – the smallest inventory since 1951.[18] Unsurprisingly, the decreasing size of the U.S. beef cow herd that has reached historically low levels occurred contemporaneously with increasing imports that have now reached record high levels.

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[15] *See* Cattle & Beef – Sector at a Glance, USDA-ERS, May 25, 2025, available at Cattle & Beef - Sector at a Glance | Economic Research Service.
[16] *See* generally Characteristics of Cattle Cycles, U.S. Beef Industry/TB-1874, USDA-ERS, available at Characteristics of Cattle Cycles.
[17] *Ibid*.
[18] NASS January briefing: U.S. cattle inventory hits lowest January 1 level since 1951; calf, lamb crops down, Citizen Portal, available at NASS January briefing: U.S. cattle inventory hits lowest January 1 level since 1951; calf, lamb crops down | Citizen Portal.

Chart 1

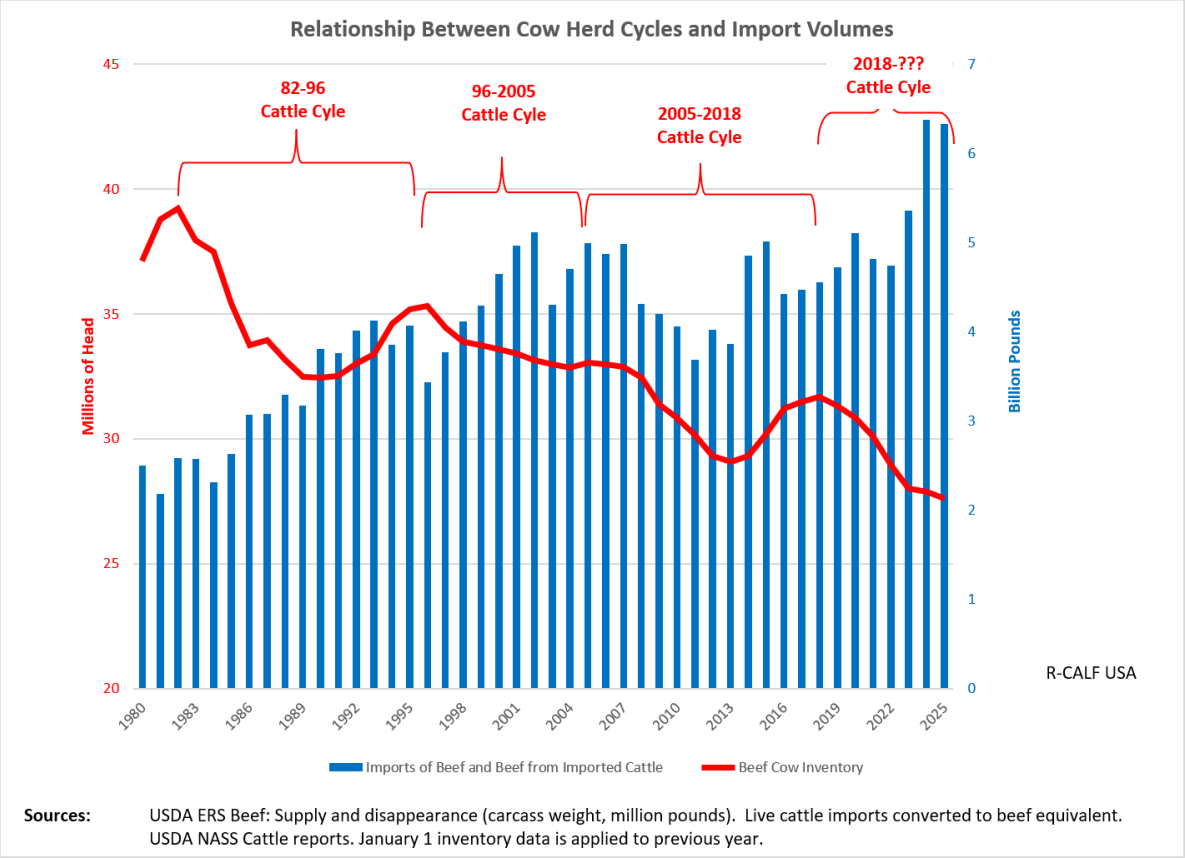


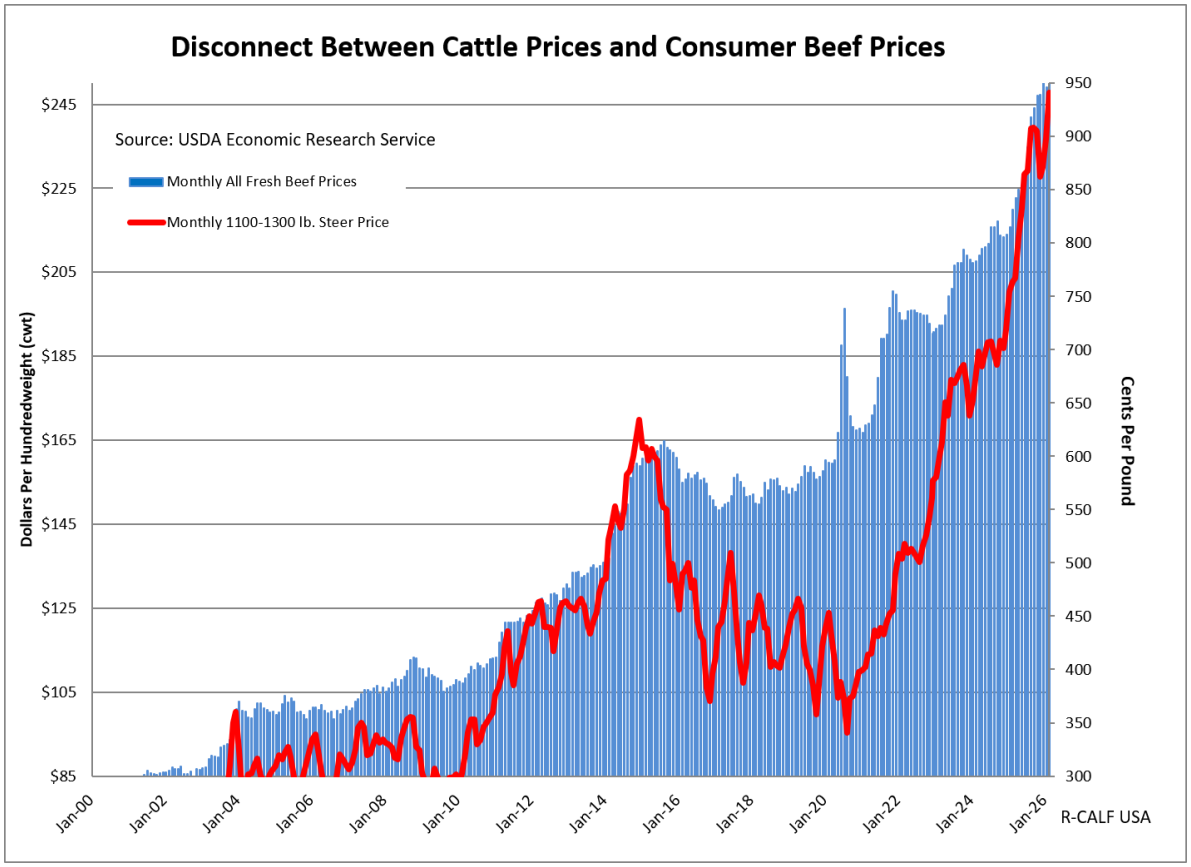
Chart 1 reveals the U.S. beef cow herd was liquidating from 2005 through 2013, resulting in what was then the smallest inventory of cows and heifers that have calved in over 70 years[19] – approximately 4 million beef cows were liquidated from the herd between 2005 and 2013.[20] However, responding to upward trending cattle prices leading up to 2013, cattle ranchers began expanding the beef cow herd in 2014. From 2014 through 2018, the U.S. beef cow herd regained ~3.6 million of the ~4 million beef cows that had been liquidated from 2005 through 2013.[21]

Concurrent with the 2014 herd expansion, imports of lower cost beef and cattle – direct product substitutes for domestic beef and cattle – increased immediately. In 2015 imports were nearly 30% above the level preceding the outset of herd expansion. Unsurprisingly, this additional surge in lower-cost imports contributed to the cattle price collapse that began in 2015 and continued for eight years. Thus, cattle prices were trending downward contemporaneous with the 2014 through 2018 herd expansion and after 2018, the beef cow herd succumbed again to lower prices and American ranchers resumed their cow herd liquidation.

[19] Cattle, USDA-NASS, ISSN: 1948-9099, available at Cattle 01/31/2014.
[20] *See* various USDA-NASS Cattle reports, available at https://esmis.nal.usda.gov/sites/default/release-files/h702q636h/gt54kq47c/wp988n114/Catt-01-31-2014.pdf.
[21] *See id*.

It is important to note that contrary to media reports indicating that drought caused the most recent downturn in the beef cow inventory, the latest liquidation phase of the U.S. beef cow herd began in 2018, which was well before the widespread drought that began around 2021. It was the ranchers' response to downward trending cattle prices depicted in Chart 2 below that triggered the 2018 outset of the latest herd liquidation, while the drought occurring during the liquidation's pendency merely exacerbated the herd's ongoing decline.

Chart 2



Note particularly in Chart 2 the prolonged period between 2015 through 2022 when domestic cattle prices were trending downward while the highly concentrated beef industry was charging American consumers upward trending prices for beef. This concentration matters because four major meatpackers — Tyson Foods, JBS USA, Cargill, and National Beef — control roughly 85% of the U.S. fed-cattle market.[22] It is also notable that two of those major packers are controlled by Brazilian meat companies: JBS USA is part of Brazilian-based JBS, and National Beef is majority-owned by Marfrig Global Foods S.A. Therefore, a Brazilian beef exemption risks benefiting Brazilian-controlled firms on both sides of the trade flow, while undermining the price signal and policy confidence U.S. ranchers need to rebuild the domestic cattle herd.

[22] USDA Economic Research Service, "Concentration in U.S. Meatpacking Industry and How It Affects Competition and Cattle Prices," Amber Waves, January 2024. https://www.ers.usda.gov/amber-waves/2024/january/concentration-in-u-s-meatpacking-industry-and-how-it-affects-competition-and-cattle-prices

The inverse relationship between cattle prices and retail beef prices shown in Chart 2 and the inverse relationship between import volumes and the contraction of the U.S. beef cow inventory in Chart 1 together highlight the severe market failure manifest in both America's cattle markets and retail beef markets that is substantially harming both ranchers and consumers. Moreover, when the positive relationship between rising import volumes and rising retail beef prices, revealed by comparing the relevant data streams depicted in Charts 1 and 2, is considered, the notion that consumer affordability can be achieved by further increasing import volumes is dispelled.

That import penetration has substantially contributed to the long-term contraction of the U.S. beef cow inventory is manifest. The U.S. Department of Agriculture has long known that increased imports lower producer welfare by lowering domestic cattle prices, but it has long rationalized that such harm to the domestic cattle industry was justified by theoretical gains in consumer welfare, which the USDA believed resulted from lower beef prices and more choice for consumers.[23] This theory cannot be squared with reality as rising import volumes since 2011 have corresponded with higher retail prices, which have become even more acute during the past three years, 2023-2025, when import volumes reached year-over-year record highs, as did retail beef prices. U.S. beef import volume is up 68% since 2023,[24] while beef prices are up 41% over the same period.[25] If increased imports were going to provide meaningful consumer relief, that effect would already be visible in the marketplace.

The fatal flaw in USDA's consumer welfare theory was the lack of understanding of the low margins that sustained America's widely dispersed, family-scale ranching operations. The lower cattle prices associated with the modeled producer welfare losses caused a mass exodus of America's beef cow operations (with over 50% of them exiting the industry since 1980)[26] and a concurrent reduction in America's beef cow inventory, ultimately leading to the extreme imbalance between cattle supplies and beef demand manifest today. The missing element in USDA's theory was balance. The agency should have endeavored to manage import supplies at levels that would complement domestic production, not displace it and its attendant domestic infrastructure as excessive imports continue to do. More imports may create the appearance of short-term action, but they do not create one more American calf. Rebuilding the domestic herd requires ranchers to make long-term investment decisions years before additional beef reaches consumers. Exempting Brazilian beef would weaken the very price signal and policy confidence needed for that rebuilding to occur.

D. Brazil's Role in the Ongoing Contraction of the U.S. Cattle Industry and Dysfunction of U.S. Cattle and Beef Markets

Trade data shown below in Chart 3 reveal that prior to 2016 the U.S. imported only processed (pre-cooked) beef (HTSUS 160250) and cured beef (HTSUS 021020) from Brazil, which was due to U.S.-

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[23] *See, e.g.*, USDA Regulatory Impact Analysis & Initial Regulatory Flexibility Analysis, Proposed Rule APHIS 2008-0010 RIN 0579- AC68, Bovine Spongiform Encephalopathy; Importation of Bovines and Bovine Products, January 2012, at 13, fn. 26, available here.

[24] USDA Foreign Agricultural Service, Global Agricultural Trade System (GATS), U.S. beef import data. https://apps.fas.usda.gov/gats

[25] U.S. Bureau of Labor Statistics, "Average Price: Ground Beef, 100% Beef (Cost per Pound/453.6 Grams) in U.S. City Average," retrieved via FRED, Federal Reserve Bank of St. Louis. https://fred.stlouisfed.org/series/APU0000703112

[26] Compare Cattle, USDA-NASS, January 30, 1981, at 16 (1980 cattle operations minus dairy operations equals 1,272,950), available at Catt-01-30-1981.pdf, with Table16. Beef Cow Herd Size by Inventory and Sales: 2022, U.S. Agricultural Census (2022 all farms with beef cow inventory number 622,162, representing a loss of over 50%), available at st99_1_015_016.pdf.

imposed foot-and-mouth disease (FMD) restrictions.[27] By 2016 the FMD restrictions were lifted, and in 2016 and 2017 the U.S. began additionally importing relatively small quantities of boneless frozen and boneless fresh and chilled beef and frozen offal from Brazil. However, because of repercussions from the Brazilian beef scandal that surfaced in 2017, the U.S. again ceased importation of all but processed beef from Brazil from mid-2017 through 2019.[28]

Beginning in 2020, however, the importation of Brazilian fresh beef, processed beef, and cured beef increased dramatically, increasing 48% year-to-year from 2019 to 2020 and 598% from 2019 to 2025. Total world imports increased 78% from 2019 to 2025,[29] indicating that increased imports from Brazil were contributing substantially to the overall increase in imported beef in the U.S. market.

Chart 3

June 10, 2026
United States Department of Agriculture
Foreign Agricultural Service

Area/Partners of Origin **January - Dece**
And General Commodities Imported **C**

			2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	Jan - Apr 2026
Partner	Product	UOM	Qty	Qty	Qty	Qty	Qty	Qty	Qty	Qty	Qty	Qty	Qty	Qty	Qty	Qty	Qty	Qty	Qty
Brazil	020230 - Bovine Boneless Froz	MT	0.0	0.0	0.0	0.0	0.0	0.0	526.0	9,237.7	0.0	0.0	18,732.8	52,924.5	106,513.8	90,275.1	182,528.3	214,866.2	121,193.1
Brazil	160250 - Bovine Meat, Prep/Pres	MT	15,073.9	10,836.5	18,785.0	24,128.0	20,304.1	36,667.9	36,794.3	26,992.2	34,700.1	39,816.8	39,964.0	50,402.1	47,746.2	41,397.8	40,636.7	44,167.2	13,427.5
Brazil	020130 - Bovine Boneless Fr/Ch	MT	0.0	0.0	0.0	0.0	0.0	0.0	2.9	145.4	0.0	0.0	396.4	1,498.6	1,068.7	881.3	11,487.5	18,744.6	11,492.7
Brazil	020220 - Bovine Bone In Froz	MT	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	76.9	150.0
Brazil	020610 - Bovine Offal Fr/Ch	MT	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	3.0	0.0	0.0	0.0	0.0	0.0
Brazil	020629 - Bovine Offal Froz	MT	0.0	0.0	0.0	0.0	0.0	0.0	0.0	52.0	0.0	0.0	0.0	25.4	2.9	0.5	50.1	0.0	827.5
Brazil	021020 - Bovine Meat, Cured	MT	0.0	0.0	0.0	0.0	0.0	0.0	0.0	4.5	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Grand Total		MT	15,073.9	10,836.5	18,785.0	24,128.0	20,304.1	36,667.9	37,323.2	36,431.8	34,700.1	39,816.8	59,093.1	104,853.6	155,331.6	132,554.6	234,702.5	277,854.9	147,090.8

Notes:
1. Data Source: U.S. Census Bureau Trade Data
2. All zeroes for a data item may show that statistics e
3. Users should use cautious interpretation on QUANT
4. Product Group : Harmonized

The herd expansion that began in 2014 was repelled by near record import volumes in 2014 and 2015, and steadily increasing imports from 2016 and through 2020, the year Brazil began its grand reentry into the U.S. market with substantial volumes of fresh, chilled, and frozen beef, along with increased volumes of processed beef. In 2020 Brazil was the fifth largest source of U.S. beef imports.[30] In 2025 it ranked third. During the first quarter of 2026, Brazil was the largest source of U.S. beef imports.[31]

Importantly, since 1994 it has been U.S. policy to discourage over quota imports from Brazil and other countries that fell under the 65,005 metric ton TRQ category designated for "other countries," which, effective January 1, 2026, was reduced to 52,005 metric tons.[32] This beef TRQ was intended to protect the domestic industry against excessive imports by applying a 26.4% tariff on beef imports that exceed the TRQ. However, Brazil, on its own, has blown past the entire 65,005 MT TRQ (now 52,005 MT) during each of the past four years.[33] Based on the data in Chart 3, Brazilian beef imports

[27] *See* Importation of Beef From a Region in Brazil, Final Rule, 80 Fed. Reg., at 37,923-934, July 2, 2015.
[28] *See* Brazil meat scandal fuels calls for U.S. ban on Brazilian raw beef, Reuters, Tom Polansek, March 27, 2017, available at Brazil meat scandal fuels calls for U.S. ban on Brazilian raw beef | Reuters; *see also* Perdue: USDA Halting Import of Fresh Brazilian Beef, USDA, June 22, 2017, available at Perdue: USDA Halting Import of Fresh Brazilian Beef | USDA.
[29] *See* Beef and veal: annual and cumulative year-to-date U.S. trade (carcass weight, 1,000 pounds), USDA-ERS, 1989-April 2026, available at Livestock and Meat International Trade Data | Economic Research Service.
[30] *See id.*
[31] *See id.*
[32] Modification of the Allocation of the WTO Tariff-Rate Quota Volumes for Beef, Notice by the USTR, December 31, 2025, available at Federal Register: Modification of the Allocation of the WTO Tariff-Rate Quota Volumes for Beef.
[33] Brazil fills US quota within six days of new trading year, Beef Central, Jan. 13, 2026 (explaining that Brazil exceeded its TRQ in 2023, 2024, 2025, and 2026), available at Brazil fills US quota within six days of new trading year - Beef Central.

exceeded the quota by an estimated 3.5 times in 2025. The current TRQ is demonstrably ineffectual at protecting the domestic industry and it is equally clear that the 26.4% over-quota tariff alone is woefully insufficient to discourage excessive import penetration by Brazil.

E. Conclusion

Allowing unrestrained beef imports from Brazil is contrary to USTR's objective of eliminating illicit deforestation in Brazil. In fact, exempting beef from the USTR's proposed tariff will likely lead to expanded export access and, hence, higher beef prices for Brazilian exporters, rewarding them for the illegal deforestation already commenced and incentivizing them to expand their illicit deforestation practices.

Further, the year-over-year increases in beef imports from Brazil measured since 2023 are all but certain to continue; and all but certain to continue exacting significant long-term harm upon the U.S. cattle industry by disincentivizing the rebuilding of America's beef supply chain and discouraging American ranchers from investing in any enduring expansion of the diminished U.S. beef cow herd.

For the foregoing reasons, we urge the USTR to remove all beef products, HTSUS codes 020110-020230; 020610-020629; 021020; and 160250, from its Annex of exemptions and apply a 25% tariff on all beef of Brazil based on its findings that Brazil's acts, policies, and practices related to deforestation are unreasonable and burden or restrict U.S. commerce.

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