ANSI's general comments for United States-Mexico-Canada Agreement (USMCA) joint review

ANSI respectfully submits comments in response to the notice seeking public input on the operation of the United States-Mexico-Canada Agreement (the Agreement) in advance of the Joint Review of the Agreement. The following comments address (1) the operation of the USMCA; (2) the effectiveness of the USMCA in promoting investment that strengthens U.S. competitiveness, productivity, and technological leadership; and (3) the Agreement's role in strengthening U.S. economic security and competitiveness.

ANSI encourages USTR to leverage the upcoming Review to convey U.S. stakeholders' assessment of the agreement's performance and introduce incremental adjustments, where needed, through existing mechanisms, including the USMCA Free Trade Commission (FTC). The FTC provides a framework for the three governments to clarify procedures, update regulatory tools, or streamline implementation where consensus exists.

ANSI is a federation whose members are government agencies, trade associations, standards developing organizations, professional societies, companies, academic and international bodies, and consumer organizations. Altogether, ANSI represents the interests of more than 270,000 companies and 30 million U.S. professionals worldwide. As the voice of the U.S. standards and conformity assessment system, ANSI empowers its members and constituents to strengthen the U.S. marketplace position in the global economy by addressing non-tariff barriers and pushing for better market access for U.S. exporters while helping to assure the safety and health of U.S. consumers. ANSI oversees the creation, promulgation, and use of thousands of norms and guidelines that directly impact businesses in nearly every sector, including new technologies such as artificial intelligence (AI) and quantum computing.

1. Operation of the USMCA

ANSI and its members underline our support for the current USMCA chapter on Technical Barriers to Trade (TBT), including its commitments that uphold and protect the U.S. market driven approach to standardization and conformity assessment.

Chapter 11 recognizes a multiple path approach to the preparation, adoption and use of standards in the three countries. This supports both a cohesive North American market and U.S. regulators' flexibility to select the standards that best suit their regulatory objectives while also facilitating U.S. exports to Mexico and Canada. Reliance on standards that diverge from international norms and are adopted without input from U.S. stakeholders leads to market fragmentation. As such ANSI and its members understand the value of the transparent framework provided by USMCA to address existing Non-Tariff Barriers (NTBs). Upholding this principle is key to mitigating the impact of NTBs and thus help the U.S. objective of improving its trade balance with both Canada and Mexico.

A second point that ANSI and its members would highlight is the opportunity for the USMCA to continue to leverage standards to ease market access. ANSI, in accordance with the principles and strategic objectives highlighted in the 2025 U.S. Standards Strategy Draft, recommends that this Joint Review look for ways the USMCA can emphasize the strategic need for standards in support of new and emerging economic sectors. Encompassing U.S. standards as a lever for market access with Canada and Mexico would support the White House objective listed in Section 2(g) of America First Trade Policy, and would ease U.S. companies' ability to export within the region, thus supporting supply chain security and resilience, manufacturing reshoring, and economic and national security alignment objectives. This would be well within the scope of Chapter 7 of the USMCA on Trade Facilitation.

2. **U.S. investment climate**

The Agreement encourages greater investment, supports innovation, and reinforces the role of standards as a foundation for safe, high-quality, and interoperable products and services that sustain U.S. economic growth, and should then continue to be a strong tool to help guide trade flows between the three countries under U.S leadership. The USMCA can continue as a fundamental part of America's leadership in services, and digital trade. Canada and Mexico are among the largest markets for U.S. services, with the U.S. Trade Representative reporting an estimated $109 billion in U.S. service exports to USMCA countries in 2022. The USMCA strengthens the U.S. investment climate by fostering regulatory certainty, transparency, and reliance on internationally recognized standards that reduce barriers to market entry.

3. **Strengthening U.S. competitiveness**

ANSI facilitates private sector involvement in the USMCA SME dialogue and supports the goals of USMCA to reduce technical barriers to trade through dialogues with the national standards bodies of Canada and Mexico, and public-private partnership programs with the U.S. government. Continued alignment with Canada and Mexico on market-relevant standards can help U.S. industries maintain their competitiveness, support high-quality jobs, and increase access to international markets. The agreement helps ensure that U.S. products and services are accepted across borders without unnecessary barriers, promoting cooperation on standards and conformity assessment. This not only may lower costs for U.S. businesses but can also accelerate the deployment of emerging technologies under American leadership.

4. **USMCA and Mexico National Quality Infrastructure (NQI) law**

The Mexico National Quality Infrastructure (NQI) law and its implementing regulation have been under development and revision during the period after USMCA implementation. Through several consultations, ANSI has submitted comments to the Secretariat of Economy in Mexico regarding lack of transparency in the development of the law and associated regulations; lack of clarity regarding how foreign participation in Mexican standard committees will be considered; and discrepancies between the NQI law language and USMCA on use of standards in technical regulations. As the NQI Law in Mexico is fundamental to its implementation of USMCA commitments, ANSI recommends that the U.S. government include this topic under the review of the Agreement.

Given that ANSI has extensive experience in implementing activities that are designed to improve the transparency of standards and regulatory frameworks, ANSI would welcome the opportunity to support any capacity building efforts aimed at leveraging the USMCA as an effective tool for making America more prosperous, safer, and stronger. These capacity building efforts would align with the provisions of USMCA Chapter 28 on Good Regulatory Practices.

In addition to the above comments, ANSI will be submitting a request to testify during the November 17, 2025 USTR public hearing.