10/30/2025

Ambassador Jamieson Greer

United States Trade Representative

600 17th St NW

Washington, DC 20508

Via Regulations.gov

Request for Public Comments Relating to the Operation of the Agreement Between the United States of America, the United Mexican States, and Canada

The National Automatic Merchandising Association (NAMA) appreciates the opportunity to comment on the Office of the U.S. Trade Representative (USTR) request for public input, "Request for Comments on the Operation of the Agreement between the United States of America, the United Mexican States, and Canada" (Docket No. USTR-2025-0004).

NAMA represents the $40 billion U.S. convenience services industry: the owners and operators of unattended retail locations, including micro markets, vending machines, and office pantry providers.

The convenience services industry provides convenient, affordable, and nutritious food choices that meet the needs of more than 40 million domestic consumers each day—whether at work, at home, or on the go. Nearly 60 percent of the industry is composed of small businesses, and it employs more than 165,000 Americans.

NAMA members champion domestic manufacturing and embody an America First ethos, with many maintaining longstanding commitments to product sourcing within their local communities. Domestic sourcing is also preferred for its cost effectiveness—American consumers value affordability and convenience services businesses operate on narrow margins to meet that demand.

Renew the USMCA Agreement and Maintain the Trilateral Approach

Brokered through President Trump's leadership during his first administration, the United States-Mexico-Canada Trade Agreement (USMCA), was a critical success for American businesses, providing domestic manufacturers with consistent access to natural resources and ingredients unavailable in the U.S., as well as reliable markets for U.S. goods.

The USMCA enables smooth, cost-effective exchanges of key materials and ensures the existence of viable markets for American products. The agreement has benefited the convenience services industry and its consumers. North American trade under the USMCA provides convenience services businesses with unimpeded access to essential inputs not produced at scale domestically, without increased supply chain barriers or costs. In turn, convenience services businesses are able to provide access and affordability for American consumers. Canada and Mexico supply complementary inputs essential for the industry—from Canadian aluminum for packaging, to fruit and vegetable ingredients from Mexico—that feed production of finished domestic goods. The trilateral structure keeps these supply chains predictable and cost-effective.

A trilateral North American approach has created reliable sourcing while reducing compliance burdens and input costs for large and small businesses alike, ensuring affordability for American consumers. NAMA urges USTR to renew the President's USMCA trade agreement and preserve the underlying trilateral approach.

Protect Domestic Supply Chains Which Require Unavailable Natural Resources

As the Presidential Administration recognized within the added "Potential Tariff Adjustments for Aligned Partners" (PTAAP) Annex, certain goods fundamental to the success of the convenience services industry, and broader U.S. economy, cannot be produced in sufficient quantities domestically.[1] These unavailable natural resources must be sourced from external trade partners. It is critical to protecting domestic manufacturing and affordability for American consumers that procurement of such goods does not come at additional cost to U.S. businesses. Access to these imports enables the convenience services industry to maintain reliable supply and affordable prices for Americans, while driving economic activity across U.S. manufacturing and distribution.

NAMA supports the September 5th executive order which established the PTAAP Annex which qualified unavailable natural resources and closely related derivative products for potential tariff exemption under trade agreements.[2] The convenience services industry encourages USTR to apply the PTAAP framework established within President Trump's executive order to established trade agreements including the USMCA: domestic manufacturing should be prioritized without penalizing U.S. businesses when essential materials are not available at home.

---

[1] The White House. *Annex II: Potential Tariff Adjustments for Aligned Partners (PTAAP)*, Annex 3. September 5, 2025. https://www.whitehouse.gov/wp-content/uploads/2025/09/ANNEX-II.pdf; The White House. *Fact Sheet: President Donald J. Trump Modifies the Scope of Reciprocal Tariffs and Establishes Procedures for Implementing Trade Deals*. September 5, 2025. https://www.whitehouse.gov/fact-sheets/2025/09/fact-sheet-president-donald-j-trump-modifies-the-scope-of-reciprocal-tariffs-and-establishes-procedures-for-implementing-trade-deals/

[2] National Automatic Merchandising Association. *Statement: NAMA Welcomes Tariff Relief*. September 5, 2025. https://namanow.org/statement-nama-welcomes-tarriff-relief/

Some raw materials and natural goods cannot be sourced in sufficient quantities from domestic manufacturers and farmers given climate limitations. For example, Mexico is able to produce fruits and vegetables year-round; U.S. markets are only able to supply these goods for a few months each year. Imports of Mexican fruits and vegetables are vital to maintaining the supply chains convenience services businesses rely on to provide American consumers access to key nutrients. Similarly, oats and other grains are unable to be sourced in the necessary volumes within the United States. The national capacity to produce oats has declined substantially over the past several decades, given prioritization of land use for crops deemed more profitable. As a result, domestic businesses acquire oats predominantly through trade with Canada. Establishing duties or trade barriers on imports like fruits and vegetables from Mexico and oats from Canada would decrease availability and affordability of these goods; there is not domestic supply readily available to meet demand.

The PTAAP Annex, established within the September 5th executive order, recognizes these underlying realities and creates a strong framework for protecting domestic supply chains which import unavailable natural resources. NAMA encourages USTR to preserve the goods listed within the PTAAP Annex as duty-free within the USMCA trade agreement. A trade agreement which protects American businesses dependent on imports of goods not readily available within the United States, is an America First trade agreement.

Thank you for considering the National Automatic Merchandising Association's feedback. As the voice of the convenience services industry, NAMA is committed to bolstering domestic businesses and advocating for the significant economic contributions of its members. Please do not hesitate to reach out to NAMA Government Affairs Manager Lauren Janes (ljanes@namanow.org) with questions.

Sincerely,

Bill Meierling

Senior Vice President, External Affairs

National Automatic Merchandising Association