

Submitted via <https://comments.ustr.gov/s/>

October 30, 2025

Daniel Watson
Assistant U.S. Trade Representative for the Western Hemisphere
Office of the United States Trade Representative

Re: Request for Comments on the Operation of the USMCA (Docket USTR-2025-0004)

Dear Assistant U.S. Trade Representative Watson:

Please accept these comments on behalf of the Irrigation Association (IA) - the national trade association representing more than 1,000 companies that manufacture, design, install, and manage irrigation systems across public and private landscapes and farms in the United States, Canada, and beyond. We appreciate the opportunity to provide input ahead of the United States–Mexico–Canada Agreement (USMCA) Joint Review.

The irrigation industry is an essential part of improving our quality of life through reliable food supply and vital green spaces in our communities. The IA represents the full value chain of irrigation equipment and services in the United States: from R&D and component manufacturing (valves, emitters, pumps, controllers, sensors) to distribution, system design, installation, and after-sales support. Our members range from global manufacturers to small and medium-sized enterprises supplying farms, greenhouses, golf, sports turf, parks, campuses, and commercial/residential landscapes.

The domestic irrigation industry is a leader in innovation and manufacturing and is a net exporter of equipment. A stable, rules-based North American framework under the USMCA allows irrigation equipment companies to continue to flourish by serving Canada's and Mexico's needs. For the reasons set forth in more detail below, the IA generally supports the current operation and implementation of the USMCA and provides a few considerations for improved implementation.

1. U.S. is a Longstanding Leader in Irrigation Equipment Innovation. Dating back to the 1902 Reclamation Act, the United States and its farmers have been investing in irrigation infrastructure, practices and equipment. The investments in irrigated agriculture were large and the impacts were significant on a national and global scale. Building on this early lead in agricultural irrigation, many companies began branching out during the 1960s and early 1970s to serve growing demand for irrigating the vital green spaces for recreation, athletics, and beauty. These early

investments and adaptations have created a strong, vital, and innovative irrigation industry that persists to this day. For example, the World Intellectual Property Organization in its 2024 Patent Landscape Report on Agrifood documents that the U.S. has been historically dominant and remains a leader in AgriTech and precision agriculture.¹ The U.S. agricultural irrigation industry has been in a leadership cohort with others like Germany, Israel and Japan, and newer competitors in China and across Asia are also gaining ground. On the landscape side, the ASABE/ICC 802 – Landscape Irrigation Sprinkler and Emitter Standard² is widely used in North America and regularly referenced in specification and procurement documents across the globe. To continue exporting innovation and U.S. manufactured irrigation equipment on a competitive basis, continued market access is needed through agreements like the USMCA.

2. Trade Data Shows U.S. is a Dominant, Net Exporter of Irrigation Equipment. Recent IA analyses using U.S. Census Bureau trade data for 2024 show the U.S. irrigation sector is a net exporter of equipment, with Canada and Mexico serving as critical export markets.³ In 2024, U.S. exports of center-pivot irrigation systems (HTS 8424.82.0010) totaled \$86 million, with nearly 70% going to Canada (\$29.6M) and Mexico (\$27.8M), and a smaller share to Australia (\$5.5M); exports to other markets were limited. By contrast, the U.S. imported only \$6.2 million in center pivots from all countries—evidence of strong domestic manufacturing and the importance of stable North American trade under USMCA. In 2024, U.S. exports of broader irrigation equipment (HTS 8424.82.0020 and 8424.82.0090) totaled \$485 million, led by Mexico (\$117.6M) and Canada (\$64.4M). Conversely, total imports in these categories were \$119.6 million, so the U.S. maintained a clear net export position.

3. Importance of Stability in Maintaining U.S. Dominance in Irrigation Equipment. Given the significance of Canada and Mexico as trade partners, the U.S. irrigation industry’s competitive edge is likely to be eroded if trade with these neighbors were to become less competitive due to trade barriers. The manufacturing facilities and supply chains for irrigation equipment take a long time to develop and are complex, and as a result they benefit from long-term stability. Furthermore, many of these facilities also include research, development and testing jobs at or near manufacturing facilities and have relationships with key academic institutions, like state land grant universities. Based on these factors, the IA supports a confirmation of a 16-year extension.

¹ World Intellectual Property Organization. *Agrifood*. Patent Landscape Report Series, 2024. doi:10.34667/tind.49840, available at [WIPO Patent Landscape Report - Agrifood](#).

² American Society of Agricultural and Biological Engineers, and International Code Council. *ASABE/ICC 802—2020: Landscape Irrigation Sprinkler and Emitter Standard*. International Code Council & ASABE, 2020. ICC Digital Codes, available at [2020 ASABE/ICC 802 Landscape Irrigation Sprinkler and Emitter Standard](#).

³ Irrigation Association. “Understanding U.S. Irrigation Equipment Exports and Tariff Exposure.” *Irrigation Association*, 14 May 2025, available on the IA’s [Economy](#) page.

4. Support for Enforcement Against Unlawful Circumvention. To ensure manufacturers beyond Canada, Mexico, and the U.S. are not circumventing the U.S. trade and tariff regimes using the USMCA, like illegal transshipping arrangements, the IA strongly supports the efforts of U.S. Customs and Border Protection—including actions under the Enforce and Protect Act—to investigate and deter circumvention and to stop false country-of-origin claims. We encourage continued funding for risk targeting, audits, and factory-level verification, and we support stronger three-country information-sharing with counterparts in Mexico and Canada for high-risk categories such as metals and assemblies used in equipment housings or frames. We also support U.S. Customs and Border Protection continuing to publish clear, accessible guidance and decisions to help small and mid-sized enterprises comply.

5. Improve Intellectual Property Protection. To better protect our members and customers from knock-off irrigation products entering the United States, we urge the governments to use the USMCA review to deliver practical, near-term steps without reopening the agreement. First, have ministers direct officials to a clear 12-18 month work plan focused on tougher border enforcement against counterfeit parts, faster investigations of false country-of-origin claims, and regular public reporting on seizures and prosecutions. Second, have the intellectual-property committee set simple cooperation rules with right-holders and with Mexican and Canadian agencies—shared risk indicators, quick points of contact, and joint factory checks where needed. Third, tighten online enforcement so marketplaces act quickly on takedown requests and repeat offenders lose access. Finally, pair these actions with plain-English guidance to help small and mid-sized businesses comply. Taken together, these steps would curb knock-offs, protect water-critical infrastructure, and keep a level playing field for U.S. manufacturers.

The IA appreciates the opportunity to comment and stands ready to provide additional data or information you may need. Please contact Andrew D. Morris, Associate Director of Regulatory and Technical Affairs, Irrigation Association at AndrewMorris@irrigation.org, with questions.

Respectfully submitted,



Natasha L Rankin, MBA, CAE
Chief Executive Officer