



**Comments Regarding the 2026 Special 301 Review**  
**By the National Milk Producers Federation and the U.S. Dairy Export Council**  
**Docket Number USTR-2025-0243**  
**January 28, 2026**

The National Milk Producers Federation (NMPF) and U.S. Dairy Export Council (USDEC) appreciate the opportunity to submit comments in response to the Federal Register Notice FR Docket No. USTR-2025-0243.

NMPF develops and carries out policies that advance the well-being of dairy producers and the cooperatives they own. The members of NMPF's cooperatives produce the majority of the U.S. milk supply, making NMPF the voice of dairy producers on Capitol Hill and with government agencies. NMPF provides a forum through which dairy farmers and their cooperatives formulate policy on national issues that affect milk production and marketing. NMPF's contribution to this policy is aimed at improving the economic interests of dairy farmers, thus assuring the nation's consumers an adequate supply of pure, wholesome, and nutritious milk and dairy products.

USDEC is a non-profit, independent membership organization that represents the global trade interests of U.S. dairy producers, proprietary processors and cooperatives, ingredient suppliers and export traders. Dairy Management Inc. founded USDEC in 1995 and, through the dairy checkoff program, is the organization's primary funder.

We would like to express our strong support for the comments submitted by the Consortium for Common Food Names regarding the issue of geographical indications (GIs) and related restrictions on the use of common food names.

U.S. dairy exporters continue to grapple with the deepening impacts of the EU's misuse of GI policies to create non-tariff agricultural trade barriers to our products. U.S. dairy companies rely on the use of food names that long ago entered into the public domain as generic terms used to market their American-made products not only here in the U.S. but also around the world. When countries prohibit their usage in response to requests to do so by the EU government, it creates a deeply uneven playing field that makes it much more difficult to successfully export the products that American workers have created using milk from U.S. farms.

NMPF and USDEC commend the Administration for securing strong commitments in reciprocal trade negotiations to protect the rights of U.S. cheesemakers to use generic terms like "parmesan." As the most detailed trade texts released to date, the Agreements on Reciprocal Trade with Malaysia and Cambodia in particular include precedent-setting provisions to preserve U.S. market access for products using common names. As the Trump Administration continues to finalize agreements and advance negotiations with additional markets, NMPF and USDEC encourage USTR to continue building upon this impressive foundation to ensure the rights of U.S. exporters to use generic terms are not at risk of EU monopolization.

The importance of the Administration's leadership on this issue cannot be understated, particularly in markets that have significant growth potential for U.S. dairy products. Agreements on Reciprocal Trade with Malaysia and Cambodia stipulate strong due processes for evaluation of GI applications and both include comprehensive lists of terms that the countries commit to ensure free use. These agreements set a gold-standard template that NMPF and USDEC urge the U.S. government to replicate in additional ongoing reciprocal trade negotiations.

NMPF and USDEC are also encouraged by the frameworks secured with Argentina, Ecuador, El Salvador and Guatemala that include similar commitments that common cheese names will not be restricted, including an explicit list of terms that the countries agree to protect. These provisions will provide critical access into what have to date been largely untapped markets in Argentina and Ecuador and certainty in the already established El Salvador and Guatemala markets. Commitments secured with Argentina are particularly important as the European Union seeks to conclude the EU-Mercosur trade agreement that would grant the European Union exclusive use rights for certain names and shut out the United States entirely. The Administration's recognition that our market access in the Western Hemisphere should be protected against bad faith attempts to restrict trade is to be commended and NMPF and USDEC look forward to working with USTR and its interagency partners as the trade frameworks are translated into agreements.

While all the markets above provide significant export opportunity for common cheese names, Indonesia is one of the largest U.S. dairy and cheese export destinations and among the industry's target areas for growth. Given the importance, NMPF and USDEC praise the Administration for negotiating a reciprocal trade framework that commits Indonesia to establish a transparent and fair process for evaluating geographical indications. With the European Union seeking to finalize their own trade agreement with Indonesia, the proactive steps taken by USTR in forestalling potential common name restrictions is particularly prescient.

Similarly, the reciprocal trade framework with Thailand includes a commitment to continue negotiations on common names and GIs. Although U.S. cheese exports to Thailand are currently limited due to high tariff barriers, the opportunity to increase sales in the market is significant if a reciprocal agreement is secured and implemented. Unfortunately, the European Union is actively seeking to restrict common cheese terms in the market in an attempt to block out competition. NMPF and USDEC again commend the Administration for taking the necessary steps to preempt trade barriers in this important market.

NMPF and USDEC would like to reiterate that the Administration's focus on this issue is particularly important and timely as the European Union seeks to aggressively pursue free trade agreements in key markets that include bad-faith GI restrictions that are expressly designed to shut out U.S. cheesemakers. This includes the conclusion of trade agreements in Mexico and Mercosur that threaten U.S. market access in the Western Hemisphere. NMPF and USDEC urge USTR to use all available tools, including the reciprocal trade negotiations and the U.S.-Mexico-Canada Agreement Joint Review, to protect common names.

We greatly appreciate the work the Trump Administration has done to reverse the concerning trend and secure explicit protections for U.S. dairy producers and cheesemakers. NMPF and USDEC look forward to continuing its work with USTR, USDA, PTO and other agencies to continue to preserve the use of common food names of commercial importance to U.S. producers in order to create a more level playing field internationally.

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