

United States Senate

WASHINGTON, DC 20510

June 25, 2026

The Honorable Marco Rubio
Secretary of State
2201 C Street NW
Washington, DC 20520

The Honorable Brooke Rollins
Secretary of Agriculture
1400 Independence Avenue SW
Washington, DC 20250

The Honorable Jamieson Greer
Ambassador
Office of the U.S. Trade Representative
600 17th Street NW
Washington, DC 20508

Dear Secretary Rubio, Secretary Rollins, and Ambassador Greer:

In correspondence with your predecessors in 2024, we raised concerns about reports of widespread illegal deforestation and unsustainable water use linked to avocados imported from Mexico. (A copy of that correspondence is attached.) We write today regarding an initiative by the Mexican federal government and the Association of Avocado Exporting Producers and Packers of Mexico (APEAM)—the avocado producers and exporters association that administers the operational framework governing avocado exports to the United States—to create a “zero deforestation” certification for Mexican avocados for export to the United States.

President Sheinbaum’s public commitment to curbing agriculture-driven deforestation is encouraging, and any credible efforts by her administration to address environmental crime in the avocado sector deserves strong U.S. support. But we are concerned by warnings from some Mexican environmentalists that this certification program could instead be used to paper over Mexico’s longstanding failure to enforce its environmental laws while allowing products of illegal deforestation to secure export eligibility.

For years, avocado production in Mexico has driven widespread illegal deforestation and other environmental harm, in some cases involving transnational criminal organizations. Most forest clearing has been illegal, yet the relevant Mexican laws go largely unenforced due in part to corruption and to threats and violence linked to affiliated criminal organizations. The consequences extend beyond Mexico: law-abiding growers on both sides of the border face unfair competition from producers operating on illegally deforested land, and major U.S. companies have faced litigation, shareholder criticism, and public scrutiny over their supply chains.

The answer to whether the Mexican federal initiative is a credible effort may hinge on how it engages with an existing one. Over the past two years, the government of Michoacán supported a

civil-society initiative to create the voluntary Pro-Forest Agriculture (PFA) certification program that now operates at a national level. Administered by Guardián Forestal, an independent Mexican nongovernmental organization, PFA uses satellite monitoring to screen avocado orchards for recent deforestation and unresolved environmental violations. Its results have been significant: several major U.S. supermarket chains now use PFA certification, and more than 60 packinghouses—responsible for more than 90% of Mexican avocado exports to the United States—are certified, according to Guardián Forestal.¹ Because certification requires excluding orchards deforested since 2018 or facing unresolved environmental penalties, the incentive to clear forest is reduced and producers now have a market-based reason to follow enforcement orders they previously ignored.

Mexico’s federal government, with APEAM, is now preparing a national “zero deforestation” certification. Many details remain undisclosed, but APEAM’s own statements indicate that orchards with recent deforestation could be certified through administrative remediation overseen by federal authorities. APEAM has made clear it intends this new system to replace PFA.²

There is reason to question whether a system created by APEAM and the federal government can replicate PFA’s success, because the features that make PFA effective are ones the federal framework will not reproduce. For example:

- PFA is voluntary, so participation rests on private sourcing decisions which, unlike a government mandate, cannot be suspended for years through the constitutional injunctions (*amparos*) that routinely delay regulatory action in Mexico.
- PFA is science-based, and its findings rest entirely on satellite and geospatial analysis, not the administrative determinations of the same institutions whose enforcement failures produced this crisis, and which remain exposed to political pressure, corruption, and criminal interference.
- PFA is independent, whereas APEAM is an industry association that represents producers and exporters, creating an inherent conflict of interest in any certification system in which it plays a significant role.³

None of this means the two efforts must operate at cross-purposes. An independent, voluntary program is most useful precisely where a government program is most exposed, and PFA can continue to function even if the federal framework is delayed in the courts or weakened in practice. A credible federal initiative would build on PFA rather than displace it. Continued efforts to displace it, by contrast, could themselves become evidence—including under Chapter

¹ https://pfa_guardianforestal.org/empresashttps://pfa_guardianforestal.org/empresas

² <https://en15dias.com/michoacan/apeam-desconoce-certificacion-ambiental-estatal-y-acusa-bloqueo-ilegal-a-tres-mil-productores-de-aguacate/>

³ <https://newrepublic.com/article/206034/super-bowl-guacamole-avocados-sustainable#:~:text=The%20packinghouses%20have%20worked%20with%20the%20program%20to%20screen%20their%20suppliers%2C%20resulting%20in%202%2C900%20orchards%20being%20blocked%20from%20sell>
<https://apeamac.com/nosotros/>
<https://apeamac.com/wp-content/uploads/2024/01/estatutos-sociales-de-APEAM-vigentes-REFORMA-NOV-20.pdf>

24 of the U.S.-Mexico-Canada Agreement—that the framework is designed to replace a system that is effectively identifying and excluding illegally deforested orchards.

For these reasons, we urge you to seek clarification from Mexican authorities regarding APEAM’s campaign, what steps, if any, are being taken to support PFA’s continued operation, and to urge Mexico to preserve PFA as a complement to its own efforts. Whether Mexico’s federal government strengthens an independent system already producing measurable results, or moves to displace it, will say a great deal about the seriousness of its commitment to addressing illegal deforestation in the avocado sector.

Thank you for your consideration.

Sincerely,



Peter Welch
United States Senator



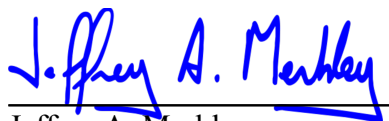
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