

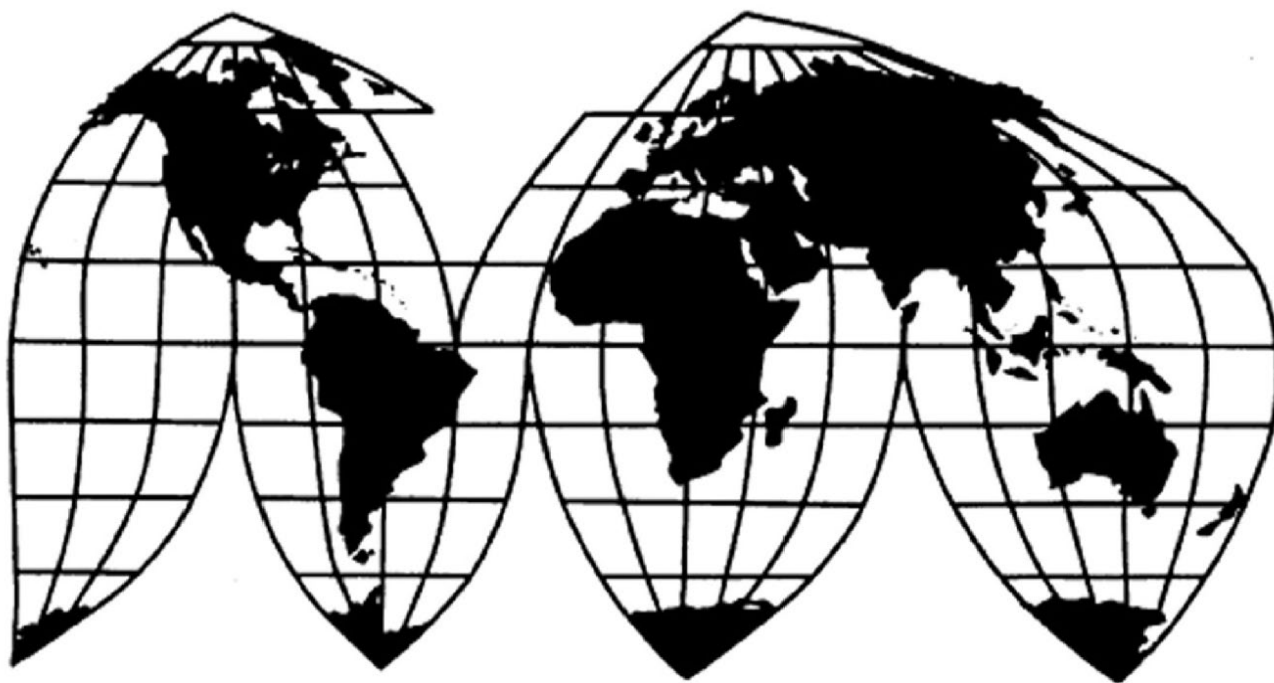
Fresh Tomatoes from Mexico

Investigation No. 751-TA-30 (Changed Circumstances Review)

Publication 5762

July 2026

U.S. International Trade Commission



U.S. International Trade Commission

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Note.—Information that would reveal confidential operations of individual firms may not be published. Such information is identified by brackets ([]) in confidential reports and is deleted and replaced with asterisks (***) in public reports. Zeroes, null values, and undefined calculations are suppressed and shown as em dashes (—) in tables. If using a screen reader, we recommend increasing the verbosity setting.

UNITED STATES INTERNATIONAL TRADE COMMISSION

Investigation No. 751-TA-30 (Changed Circumstances Review)

Fresh Tomatoes from Mexico

DETERMINATION

On the basis of the record¹ developed in the subject review, the United States International Trade Commission (“Commission”) determines, pursuant to Section 751(b) of the Tariff Act of 1930 (“the Act”), that changed circumstances sufficient to warrant revocation of the antidumping duty order on fresh tomatoes from Mexico do not exist.²

BACKGROUND

On May 9, 2025, the Commission received a request filed on behalf of Bioparques de Occidente, S.A. de C.V., Agrícola La Primavera, S.A. de C.V., and Kaliroy Fresh, LLC (“Bioparques Group”) to review its affirmative determination in antidumping duty investigation No. 731-TA-747 (Final). After consideration of the request for review and of responses to a *Federal Register* notice inviting comments (90 FR 26065), the Commission instituted investigation No. 751-TA-30 effective January 21, 2026 (91 FR 3216). Notice of the scheduling of the review and of a public hearing to be held in connection therewith was given by posting copies of the notice in the Office of the Secretary, U.S. International Trade Commission, Washington, DC, and by publishing the notice in the *Federal Register* on January 26, 2026 (91 FR 3216).³ The Commission conducted its hearing on May 19, 2026. All persons who requested the opportunity were permitted to participate.

¹ The record is defined in § 207.2(f) of the Commission’s Rules of Practice and Procedure (19 CFR 207.2(f)).

² Chairman David S. Johanson was recused and did not participate in this review.

³ The period between the request by the Bioparques Group and the Commission’s institution of the subject review included a lapse in appropriations and ensuing cessation of Commission operations.

Views of the Commission

Based on the record in this review, we determine under section 751(b) of the Tariff Act of 1930, as amended (“the Act”), that changed circumstances sufficient to warrant revocation of the antidumping duty order on fresh tomatoes from Mexico do not exist.

I. Purpose of the Review

The purpose of Section 751 of the Act is to provide an opportunity for the review of outstanding antidumping and countervailing duty orders. Section 751(b) of the Act requires the Commission to conduct a review of an affirmative antidumping or countervailing duty determination whenever it receives information or a request that “shows changed circumstances sufficient to warrant a review.”¹

Section 751(b)(1) of the Act states that a changed circumstances review is triggered when the Commission determines that it has received information or a request from an interested party “which shows changed circumstances sufficient to warrant a review” of a previous affirmative determination of material injury.² The statute does not explicitly indicate what developments might constitute “changed circumstances”, or what degree of change would be “sufficient to warrant review.” In evaluating past requests for changed circumstances reviews, the Commission has stated that it will not institute such a review unless it is persuaded there is sufficient information demonstrating:

- (1) that there are significant changed circumstances from those in existence at the time of the original investigation;
- (2) that those changed circumstances are not the natural and direct result of the imposition of the antidumping {or countervailing} duty order; and
- (3) that the changed circumstances, allegedly indicating that revocation of the order would not be likely to lead to the continuation or recurrence of material injury to the domestic industry, warrant a full {review} investigation.³

¹ 19 U.S.C. § 1675(b)(1).

² 19 U.S.C. § 1675(b)(1). *See also* 19 C.F.R. 207.45(c).

³ *Gray Portland Cement and Cement Clinker from Mexico*, 66 Fed. Reg. 65740 (Dec. 20, 2001) (“Cement”). *See, generally*, *A. Hirsh, Inc. v. United States*, 737 F. Supp. 1186 (Ct. Int’l Trade 1990) (Hirsh II); *Avesta AB v. United States*, 724 F. Supp. 974 (Ct. Int’l Trade 1989), *aff’d*, 914 F.2d 232 (Fed. Cir. 1990), *cert. denied*, 111 S. Ct. 1308 (1991) (Avesta II).

Section 751(b)(2)(A) of the Act states that in conducting a changed circumstances review of an antidumping or countervailing duty order or finding, “the Commission shall . . . determine whether revocation of the order or finding is likely to lead to continuation or recurrence of material injury.”⁴ The Act provides “special rules” with respect to determinations of likelihood of continuation and recurrence of material injury that are applicable both to changed circumstances reviews conducted under section 751(b) and five-year reviews conducted under section 751(c).⁵ These rules require the Commission to consider:

whether revocation of an order . . . would be likely to lead to continuation or recurrence of material injury within a reasonably foreseeable time . . . {by} consider{ing} the likely volume, price effect, and impact of imports of the subject merchandise on the industry if the order is revoked.⁶

Section 751(b)(3)(B) of the Act states that in a changed circumstances review, “the party seeking revocation of an order or finding. . . shall have the burden of persuasion with respect to whether there are changed circumstances sufficient to warrant such revocation.”⁷ The legislative history emphasizes that, while no party has the burden of proof in a changed circumstances review:

A section 751 review does not begin from an entirely neutral starting point. The party seeking revocation of the order has a burden of persuasion, in the sense that at the end of the investigation, the ITC must be convinced that revocation of the order is appropriate. In short, the ITC must determine that, in light of the “changed circumstances,” the revocation of the order will not result in material injury or threat of material injury to the U.S. industry.⁸

Although the Uruguay Round Agreements Act (“URAA”) reorganized the changed circumstances section of the statute and provided new criteria for the Commission to examine in determining whether there was a likelihood of continuation or recurrence of material injury, it did not substantively change the “burden of persuasion” provision. The Statement of Administrative Action accompanying the URAA (“SAA”) emphasizes that the party seeking revocation “continues to bear the burden of persuasion.”⁹

⁴ 19 U.S.C. § 1675(b)(2)(A).

⁵ 19 U.S.C. § 1675a.

⁶ 19 U.S.C. § 1675a(a)(1). *See also id.* at § 1675a(a)(2)–(4) (explaining how the Commission is to evaluate volume, price, and industry impacts).

⁷ 19 U.S.C. § 1675(b)(3)(B).

⁸ H. Conf. Rep. 98-1156 at 182 (1984).

⁹ H.R. Rep. 103-316, vol. I at 878 (1994).

The Court of International Trade (“CIT”) has concluded that the statutory “burden of persuasion” is not the equivalent of a burden of proof, reasoning that:

the ‘burden of persuasion’ language was enacted into law to ensure that the domestic industry was not put in the position of having to justify why an existing order was still necessary in a changed circumstances investigation conducted by the Commission . . . the importers’ burden of persuasion in this case was to persuade the Commission that revocation of the order would not likely lead to material injury.

The Commission’s function, in turn, is to weigh the evidence and make a determination.¹⁰

The Court of Appeals for the Federal Circuit (“Federal Circuit”) has held that “a decision to undertake review is a threshold decision which merely sets the review proceeding in motion and has no bearing on the merits. The evidence submitted in support thereof may or may not be persuasive on the issue of revocation.”¹¹ Thus, the institution of a review does not affect the requestor’s burden of persuading the Commission that the alleged changed circumstances in fact exist. The Federal Circuit has also indicated that, in a changed circumstances review, the Commission “must assume that dumping will resume if the antidumping duty order is revoked or cancelled.”¹² Last, the Federal Circuit has found that Congress provided broad delegation of discretion to the Commission in these matters and intended the review process to continue to proceed on a case-by-case basis.¹³

These authorities indicate two important differences between changed circumstances reviews and other proceedings under Title VII of the Act. First, the 1984 legislative history makes clear that the Commission is intended to treat the order under review as being valid and “necessary.” Second, both the 1984 legislative history and the URAA make clear that the “changed circumstances sufficient to warrant termination” language in the statute requires the Commission to find some nexus between the changed circumstances and conditions warranting revocation. Nevertheless, neither *Titanium Metals* nor other prior CIT decisions or Commission opinions indicate with any specificity what the party seeking revocation must demonstrate to meet its “burden of persuasion” in a changed circumstances review.

We observe that the statute imposes different standards for instituting a changed circumstances review and for revoking an order following such a review. For institution, the Commission must possess information “sufficient to warrant a review of such determination or

¹⁰ *Titanium Metals Corp. v. United States*, 155 F. Supp. 750, 759 (Ct. Int’l Trade 2001) quoting H.R. Conf. Rep. No. 98-1156 at 182-183 (1984).

¹¹ *Matsushita Electric Industrial Co. v. United States*, 750 F.2d 927, 932 (Fed. Cir. 1984).

¹² *American Permac, Inc. v. United States*, 831 F.2d 269, 274 (Fed. Cir. 1987).

¹³ *Avesta AB v. United States*, 914 F.2d 233, 236-37 (Fed. Cir. 1990), cert. denied, 111 S. Ct. 1308 (1991).

agreement.”¹⁴ By contrast, the statute states that the party seeking revocation has “the burden of persuasion with respect to whether there are changed circumstances sufficient to warrant . . . termination.”¹⁵ The standard for revocation, therefore, is higher than the standard for institution, in that the “sufficient to warrant review” is met when information or a request justifies further inquiry, whereas “sufficient to warrant . . . termination” is met only when, based on the weight of the record, a review justifies the conclusion that change circumstances exist. The Commission has previously found that these differences indicate that the Commission may find that the “changed circumstances” identified at the time of institution may not in fact exist, removing the need to proceed to the question of whether change circumstances warrant revocation of the order, or whether revocation of the order would be likely to lead to continuation or recurrence of material injury or threat thereof.¹⁶

We also find support for this conclusion in the Commission’s negative determination in the changed circumstances review of *Liquid Crystal Display Television Receivers from Japan*. In that proceeding, the Commission instituted the review because it concluded that new technology for liquid crystal display (“LCD”) televisions was a changed circumstance sufficient to warrant review. After conducting that review, the Commission acknowledged that LCD televisions were a new type of product that it had not examined in its prior review of the antidumping duty order covering television receivers from Japan, but found that it did not warrant their exclusion from an existing antidumping duty order on color televisions from Japan because the evidence showed that LCD televisions were not sufficiently different from other types of televisions to justify treatment as a separate domestic like product. The Commission issued a negative determination without reaching the question of the likely effects of revocation.¹⁷

The CIT sustained the Commission’s determination in *Citizen Watch Co. v. United States*. The Court concluded that the applicable statutory language compelled the result that:

Attempts to give a conclusive and permanent binding effect to the preliminary or “first phase” determinations of the Commission are not looked on with favor. For this reason, it appears indisputable to the Court that the basic issue of changed circumstances remains an open question during the full review.¹⁸

¹⁴ 19 U.S.C. § 1675(b)(1).

¹⁵ 19 U.S.C. § 1675(b)(3)(B).

¹⁶ *Certain Frozen Warmwater Shrimp and Prawns From India and Thailand*, Inv. Nos. 751-TA-28-29, USITC Pub. 3813 at 5-6 (Nov. 2005).

¹⁷ *Liquid Crystal Display Television Receivers from Japan*, Inv. No. 751-TA-14, USITC Pub. 2042 (Dec. 1987).

¹⁸ *Citizen Watch Co. v. United States*, 733 F. Supp. 383, 387 (Ct. Int’l Trade 1990).

To meet its burden of persuasion in this regard, the party seeking revocation would need to demonstrate either that a relevant circumstance existing during the original investigation has changed in a meaningful way, or that a new circumstance has arisen that might affect whether revocation of the order would be likely to lead to continuation or recurrence of material injury within a reasonably foreseeable time.

II. Background

Original Investigation. The antidumping petition concerning fresh tomatoes from Mexico was deemed by the Commission and Commerce to be filed on April 1, 1996, by the Florida Tomato Growers Exchange, Florida Tomato Exchange (“FTE”), the Tomato Committee of the Florida Fruit and Vegetable Association, the South Carolina Tomato Association, the Gadsden County Tomato Growers Association, and the Ad Hoc Group of Florida, California, Georgia, Pennsylvania, South Carolina, and Virginia Tomato Growers.¹⁹ On May 16, 1996, the Commission notified Commerce that it reached an affirmative preliminary determination in its antidumping duty investigation.²⁰ Subsequently, on October 28, 1996, Commerce signed a suspension agreement with certain growers/exporters of fresh tomatoes from Mexico that accounted for substantially all imports of fresh tomatoes from Mexico, in which “each signatory producer/exporter ... agreed to revise its prices to eliminate completely the injurious effects of exports” of fresh tomatoes to the United States.²¹ Effective November 1, 1996, Commerce suspended its antidumping duty investigation on imports of fresh tomatoes from Mexico.²²

¹⁹ *Initiation of Antidumping Duty Investigation: Fresh Tomatoes from Mexico*, 61 Fed. Reg. 18,377 (April 25, 1996).

²⁰ *Fresh Tomatoes From Mexico; Import Investigation*, 61 Fed. Reg. 28,890 (June 6, 1996). See also *Fresh Tomatoes from Mexico*, Inv. No. 731-TA-747 (Preliminary), USITC Pub. 2967 (May 1996) (“Preliminary Determination”).

²¹ *Suspension of Antidumping Investigation: Fresh Tomatoes From Mexico*, 61 Fed. Reg. 56,618 (Nov. 1, 1996). All subsequent suspension agreements concluded by Commerce were signed with producers/exporters accounting for substantially all imports of fresh tomatoes from Mexico at the time, and incorporated language identical to that quoted above, committing each signatory to agree to revise its prices to eliminate the injurious effects of exports of fresh tomatoes to the United States. Under the terms of these agreements, subject imports were to be sold at or above certain established reference prices segmented variously by variety, growing method, or date of importation. *Id.* at 56,620-56,621. In later suspension agreements, individual reference prices were adopted by Commerce and Mexican producers/exporters to be applied to fresh tomatoes imported from July 1 to October 22 of a given year or during the rest of the year, whether grown in an open field or adapted environment or in a controlled environment, whether a specialty tomato or other than specialty tomato, and if a specialty tomato, whether imported loose or packed. See, e.g., *Fresh Tomatoes From Mexico: Suspension of Antidumping Investigation*, 78 Fed. Reg. 14967, 14972 (Mar. 8, 2013).

²² *Suspension of Antidumping Investigation: Fresh Tomatoes From Mexico*, 61 Fed. Reg. 56,618 (Nov. 1, 1996).

Effective the same day, the Commission suspended the final phase of its investigation.²³

On October 1, 2001, Commerce initiated and the Commission instituted their first five-year reviews of the suspended investigations.²⁴ In January 2002, the Commission determined to conduct a full review.²⁵ On May 31, 2002, Mexican tomato growers/exporters submitted to Commerce a notice of their withdrawal from the agreement suspending the investigation.²⁶ Effective July 30, 2002, Commerce terminated the suspension agreement,²⁷ and Commerce and the Commission both terminated their first five-year reviews and resumed their respective antidumping investigations.²⁸ On December 4, 2002, Commerce and certain growers/exporters of fresh tomatoes from Mexico signed a new suspension agreement with certain growers/exporters of fresh tomatoes from Mexico.²⁹ Effective December 16, 2002, Commerce and the Commission suspended their resumed investigations.³⁰

On November 1, 2007, Commerce initiated and the Commission instituted their second five-year reviews of the suspended investigations.³¹ On November 26, 2007, Mexican tomato growers/exporters submitted to Commerce a notice of their withdrawal from the agreement suspending the investigation.³² Effective January 18, 2008, Commerce terminated the suspension agreement,³³ and Commerce and the Commission both terminated their second five-year reviews and resumed their respective antidumping investigations.³⁴ Effective January 22, 2008, Commerce and the Commission suspended their resumed antidumping investigations after Commerce signed a new suspension agreement with certain growers/exporters of fresh

²³ *Fresh Tomatoes From Mexico; Investigation Suspension*, 61 Fed. Reg. 58,217 (Nov. 13, 1996).

²⁴ *Notice of Initiation of Five-Year Review*, 66 Fed. Reg. 49,926 (Oct. 1, 2001); *Fresh Tomatoes From Mexico*, 66 Fed. Reg. 49,975 (Oct. 1, 2001). The Commission instituted its five-year reviews of the suspended investigation pursuant to section 751(c) of the Tariff Act, which requires the Commission to determine whether termination of the suspended investigation on fresh tomatoes from Mexico would likely lead to a continuation or recurrence of material injury. See 19 U.S.C. § 1675(c)(1).

²⁵ *Fresh Tomatoes From Mexico*, 67 Fed. Reg. 3229 (Jan. 23, 2002).

²⁶ *Fresh Tomatoes From Mexico*, 67 Fed. Reg. 43278 (June 27, 2002).

²⁷ *Fresh Tomatoes From Mexico*, 67 Fed. Reg. 50,858 (Aug. 6, 2002).

²⁸ *Fresh Tomatoes From Mexico*, 67 Fed. Reg. 53,361 (Aug. 15, 2002); *Fresh Tomatoes From Mexico*, 67 Fed. Reg. 56,854 (Sep. 5, 2002).

²⁹ *Suspension of Antidumping Investigation: Fresh Tomatoes From Mexico*, 67 Fed. Reg. 77,044 (Dec. 16, 2002); *Fresh Tomatoes From Mexico*, 67 Fed. Reg. 78,815 (Dec. 26, 2002).

³⁰ *Suspension of Antidumping Investigation: Fresh Tomatoes From Mexico*, 67 Fed. Reg. 77,044 (Dec. 16, 2002); *Fresh Tomatoes From Mexico*, 67 Fed. Reg. 78,815 (Dec. 26, 2002).

³¹ *Initiation of Five-Year ("Sunset") Reviews*, 72 Fed. Reg. 61,861, (Nov. 1, 2007); *Fresh Tomatoes from Mexico*, 72 Fed. Reg. 61,903 (Nov. 1, 2007).

³² *Fresh Tomatoes From Mexico*, 73 Fed. Reg. 2887 (Jan. 16, 2008).

³³ *Fresh Tomatoes From Mexico*, 73 Fed. Reg. 2,887 (Jan. 16, 2008).

³⁴ *Fresh Tomatoes From Mexico*, 73 Fed. Reg. 2,887, 2,888 (Jan. 16, 2008); *Fresh Tomatoes From Mexico*, 73 Fed. Reg. 5,869 (Jan. 31, 2008).

tomatoes from Mexico.³⁵

Effective December 1, 2012, Commerce initiated its third five-year review of the suspended investigation and,³⁶ on December 3, 2012, the Commission instituted its third five-year review.³⁷ Following the withdrawal from the suspension agreement by certain Mexican tomato growers/exporters, effective March 1, 2013, Commerce terminated the third suspension agreement and its third five-year review of the suspended investigation, and resumed its antidumping investigation.³⁸ Effective March 4, 2013, the Commission terminated its review of the suspended investigation and resumed the final phase of its investigation.³⁹ The same day, Commerce signed a new agreement with certain growers/exporters of fresh tomatoes from Mexico, and suspended its resumed investigation (“2013 Suspension Agreement”).⁴⁰ Effective March 5, 2013, the Commission suspended its resumed final phase investigation.⁴¹

On February 1, 2018, Commerce initiated and the Commission instituted their fourth five-year reviews of the suspended investigations.⁴² On May 7, 2018, the Commission determined to conduct a full review.⁴³ Following a request by FTE, Commerce terminated the fourth suspension agreement and resumed its investigation, effective May 13, 2019.⁴⁴ Effective May 7, 2019, the Commission terminated its review of the suspended investigation and resumed the final phase of its investigation.⁴⁵ On September 19, 2019, Commerce signed a

³⁵ *Suspension of Antidumping Investigation: Fresh Tomatoes From Mexico*, 73 Fed. Reg. 4,831 (Jan. 28, 2008); *Fresh Tomatoes From Mexico*, 73 Fed. Reg. 7,762 (Feb. 11, 2008).

³⁶ *Initiation of Five-Year (“Sunset”) Review*, 77 Fed. Reg. 71,684 (Dec. 3, 2012).

³⁷ *Fresh Tomatoes From Mexico: Institution of a Five-Year Review Concerning the Suspended Investigation on Fresh Tomatoes From Mexico*, 77 Fed. Reg. 71,629 (Dec. 3, 2012).

³⁸ *Fresh Tomatoes From Mexico: Termination of Suspension Agreement, Termination of Five-Year Sunset Review, and Resumption of Antidumping Investigation*, 78 Fed. Reg. 14,771 (Mar. 7, 2013).

³⁹ *Fresh Tomatoes From Mexico; Termination of Five-Year Review and Resumption of Antidumping Investigation*, 78 Fed. Reg. 16,529 (Mar. 15, 2013).

⁴⁰ *Fresh Tomatoes From Mexico: Suspension of Antidumping Investigation*, 78 Fed. Reg. 14,967 (Mar. 8, 2013).

⁴¹ *Fresh Tomatoes From Mexico; Suspension of Antidumping Investigation*, 78 Fed. Reg. 16,530 (Mar. 15, 2013).

⁴² *Initiation of Five-Year (Sunset) Reviews*, 83 Fed. Reg. 4,641 (Feb. 1, 2018); *Fresh Tomatoes From Mexico; Institution of a Five-Year Review*, 83 Fed. Reg. 4,676 (Feb. 1, 2018).

⁴³ *Fresh Tomatoes From Mexico; Notice of Commission To Schedule and Determination To Conduct a Full Five-Year Review*, 83 Fed. Reg. 50408 (Oct. 5, 2018); Explanation of Commission Determination on Adequacy, EDIS Doc. 645138 (May 15, 2018).

⁴⁴ *Fresh Tomatoes From Mexico: Termination of Suspension Agreement, Rescission of Administrative Review, and Continuation of the Antidumping Duty Investigation*, 84 Fed. Reg. 20,858 (May 13, 2019).

⁴⁵ *Fresh Tomatoes From Mexico; Termination of Review*, 84 Fed. Reg. 21,360 (May 14, 2019); *Fresh Tomatoes From Mexico; Resumption of the Final Phase of an Anti-Dumping Duty Investigation*, 84 Fed. Reg. 27,805 (June 14, 2019).

new agreement with certain growers/exporters of fresh tomatoes from Mexico (“2019 Suspension Agreement”), and again suspended its resumed investigation.⁴⁶ Effective September 24, 2019, the Commission suspended its resumed final phase investigation.⁴⁷

Following requests filed by FTE and Red Sun Farms Virginia LLC (“Red Sun”), on October 25, 2019, Commerce resumed its final investigation and made an affirmative determination that fresh tomatoes from Mexico are being, or are likely to be, sold at less than fair value in the United States.⁴⁸ On October 17, 2019, the Commission continued the final phase of its investigation⁴⁹ and, on December 9, 2019, made an affirmative determination that the fresh tomatoes industry in the United States was threatened with material injury.⁵⁰ Because of the September 19, 2019 Suspension Agreement, no antidumping duty order was imposed as a result of the agencies' affirmative determinations.

On August 1, 2024, Commerce initiated and the Commission instituted their fifth five-year reviews of the suspended investigations.⁵¹ Following a request filed by FTE on June 16, 2023, Commerce announced that it intended to terminate the 2019 Suspension Agreement, effective July 14, 2025.⁵² Commerce duly withdrew from and terminated the suspension agreement and issued an antidumping duty order on fresh tomatoes from Mexico, effective July 14, 2025.⁵³ Effective on that date, the Commission terminated its fifth five-year review.⁵⁴

⁴⁶ *Fresh Tomatoes From Mexico: Suspension of Antidumping Duty Investigation*, 84 Fed. Reg. 49,987 (Sep. 24, 2019).

⁴⁷ *Fresh Tomatoes From Mexico; Suspension of Anti-Dumping Investigation*, 84 Fed. Reg. 54,639 (Oct. 10, 2019).

⁴⁸ *Fresh Tomatoes From Mexico: Final Determination of Sales at Less Than Fair Value*, 84 Fed. Reg. 57,401 (Oct. 25, 2019). *See also* *Fresh Tomatoes from Mexico*, Inv. No. 731-TA-747 (Final), USITC Pub. 5003 (Dec. 2019) (“Original Determination”); Confidential Views of the Commission – Fresh Tomatoes from Mexico; INV No. 731-TA-747 (Final), EDIS Doc. 882937 (Dec. 10, 2019) (“Confidential Original Determination”).

⁴⁹ *Fresh Tomatoes From Mexico; Continuation of the Final Phase of an Antidumping Duty Investigation and Revised Schedule*, 84 Fed. Reg. 56,837 (Oct. 23, 2019).

⁵⁰ *Fresh Tomatoes From Mexico*, 84 Fed. Reg. 67,958 (Dec. 12, 2019).

⁵¹ *Initiation of Five-Year (Sunset) Reviews*, 89 Fed. Reg. 62,717 (Aug. 1, 2024); *Fresh Tomatoes From Mexico; Institution of a Five-Year Review*, 89 Fed. Reg. 62,786 (Aug. 1, 2024). Effective December 4, 2024, Commerce found that termination of the 2019 Suspension Agreement would be likely to lead to continuation or recurrence of dumping. *Fresh Tomatoes From Mexico: Final Results of the Expedited Sunset Review of Suspended Investigation*, 89 Fed. Reg. 96,213 (Dec. 4, 2024).

⁵² *Fresh Tomatoes From Mexico: Intent To Terminate Suspension Agreement, Rescind an Administrative Review, and Issue an Antidumping Duty Order*, 90 Fed. Reg. 16,499 (Apr. 18, 2025).

⁵³ *Fresh Tomatoes From Mexico: Termination of Suspension Agreement, Rescission of Administrative Reviews, and Imposition of an Antidumping Duty Order*, 90 Fed. Reg. 33,363 (July 17, 2025).

⁵⁴ *Fresh Tomatoes From Mexico; Termination of Five-Year Review*, 90 Fed. Reg. 35,933 (July 30, 2025).

Current Review. On May 9, 2025, Bioparques de Occidente, S.A. de C.V., Agricola La Primavera, S.A. de C.V., and Kaliroy Fresh, LLC (collectively, the “Bioparques Group” or “Requestors”) filed a request for the Commission to review its affirmative determination in the original investigation pursuant to section 751(b) of the Act (19 U.S.C. 1675(b)). The Requestors argued that if the 2019 Suspension Agreement expired without continuation on July 14, 2025, the Commission should conduct a changed circumstances review of the affirmative threat of material injury determination regarding fresh tomatoes from Mexico.⁵⁵ The Requestors asserted that there had been several significant changes since the Commission last examined the fresh tomatoes industry in 2019, including:

- changes in customer preferences and demand resulting in a segmented U.S. market for fresh tomatoes,
- significant investment by U.S. producers in greenhouse and other “protected culture” growing facilities outside of California and Florida,
- major investments by U.S. growers in Mexico to supplement their U.S. tomato production operations,
- major investments by growers of greenhouse tomatoes from Canada resulting in an increase in imports of nonsubject greenhouse and protected culture tomatoes in the U.S. market, and
- structural challenges facing open-field U.S. growers based in Florida and California.⁵⁶

On June 18, 2025, the Commission published a *Federal Register* notice inviting comments from the public on whether, if Commerce terminated the 2019 Suspension Agreement, changed circumstances existed sufficient to warrant the institution of a changed circumstances review investigation of the Commission's original determination.⁵⁷ On July 15,

⁵⁵ Bioparques Group Changed Circumstances Request (“Bioparques Request”), EDIS Doc. No. 850812 (May 9, 2025) at 1-2.

⁵⁶ Bioparques Request at 3-19.

⁵⁷ *Fresh Tomatoes From Mexico; Request for Comments Regarding the Institution of a Section 751(b) Review Concerning the Commission's Affirmative Determination and Continued Antidumping Duty Investigation*, 90 Fed. Reg. 26,065 (June 18, 2025). The Commission received six submissions in response to its notice soliciting comments. Commenters that supported institution of changed circumstances reviews include the Bioparques Group; NS Brands, Ltd. and NatureSweet Invernaderos S. de R.L. de C.V./NatureSweet Comercializadora, S. de R.L. de C.V.; Asociación Mexicana de Horticultura Protegida, A.C., Asociación de Productores de Hortalizas del Yaqui y Mayo, Confederación de Asociaciones Agrícolas del Estado de Sinaloa, A.C., Consejo Agrícola de Baja California, A.C., and Sistema Producto Tomate;

2025, Commerce gave notice of its withdrawal from and termination of the 2019 Suspension Agreement, and issuance of an antidumping duty order.⁵⁸

On January 21, 2026, after reviewing the comments it received in response to that request, the Commission determined that it had received information which showed changed circumstances sufficient to warrant instituting the instant review.⁵⁹

The Commission received prehearing and posthearing briefs from FTE, an association of domestic growers and packers of fresh tomatoes and a petitioner in the original investigation.⁶⁰ The Commission received prehearing and posthearing briefs submitted jointly by five Mexican associations representing producers and/or exporters of fresh tomatoes (collectively “Mexican Associations”).⁶¹ The Commission also received prehearing and/or posthearing submissions filed individually by the Fresh Produce Association of the Americas – Tomato Division (“FPAA”), an association representing importers of fresh tomatoes;⁶² GoodFarms, Inc. (“GoodFarms”), a U.S. importer of fresh tomatoes;⁶³ Mastronardi Produce Limited and its affiliates

Mastronardi Produce—USA, Inc., Mastronardi International, Ltd., and Mastronardi Produce, Ltd.; and the Fresh Produce Association of the Americas. FTE filed comments opposing institution of a changed circumstances review.

⁵⁸ *Fresh Tomatoes From Mexico: Termination of Suspension Agreement, Rescission of Administrative Reviews, and Imposition of an Antidumping Duty Order*, 90 Fed. Reg. 33,363 (July 15, 2025).

⁵⁹ *Fresh Tomatoes From Mexico; Institution and Scheduling of Review Investigation Concerning the Commission's Affirmative Determination in Investigation No. 731-TA-747 (Final)*, *Fresh Tomatoes From Mexico*, 91 Fed. Reg. 3,216 (Jan. 26, 2026). The Commission determined that the additional analysis needed to consider the asserted changed circumstances and cure data collected in its fifth review of the suspended final phase antidumping investigation was good cause to exercise its authority to waive the institution period pursuant to section 207.45(c) of the Commission's Rules of Practice and Procedure (19 CFR 207.45(c)). *Id.* at n.2. The institution period was further delayed due to the lapse in appropriations and ensuing cessation of Commission operations that occurred from October 1 to November 12, 2025. Commissioner Karpel determined that the changed circumstances alleged by Mexican respondent interested parties in their request for a review were not sufficient to warrant institution of a review under section 751(b) and as detailed below based on the record of this review concludes that changed circumstances do not exist. *Id.* at n.1.

⁶⁰ FTE Prehearing Br., EDIS Doc. No. 881784 (May 8, 2026); FTE Posthearing Br., EDIS Doc. No. 883543 (May 28, 2026); FTE Final Comments, EDIS Doc. No. 886218 (June 25, 2026).

⁶¹ Mexican Associations Prehearing Br., EDIS Doc. No. 881809 (May 8, 2026); Mexican Associations Posthearing Br., EDIS Doc. No. 883555 (May 28, 2026); Mexican Associations Final Comments, EDIS Doc. No. 886216 (June 25, 2026). The five Mexican associations are Asociación Mexicana de Horticultura Protegida; A.C.; Confederación de Asociaciones Agrícolas del Estado de Sinaloa, A.C.; Consejo Agrícola de Baja California A.C.; Asociación de Productores de Hortalizas del Yaqui y Mayo; and Sistema Producto Tomate. *Id.* at 1.

⁶² FPAA Prehearing Br., EDIS Doc. No. 881764 (May 8, 2026); FPAA Posthearing Br., EDIS Doc. No. 883551 (May 28, 2026). FPAA does not provide a list of its members. This information is available on its website: [Distributor Membership Directory – FPAA](#) (last accessed June 9, 2026).

⁶³ Goodfarms Posthearing Stmt., EDIS Doc. No. 883470 (May 28, 2026).

("Mastronardi"), which produce fresh tomatoes in the United States, Mexico, and Canada, export subject merchandise from Mexico, and import fresh tomatoes into the United States;⁶⁴ NS Brands Ltd. and its affiliates ("NatureSweet" or "NS Brands"), a producer of fresh tomatoes in the United States and Mexico and U.S. importer of fresh tomatoes;⁶⁵ and the government of Mexico ("GOM").⁶⁶ Representatives of FTE, Mexican Associations, FPAA, Mastronardi, NatureSweet, and GOM, appeared at the Commission's hearing with counsel.⁶⁷

The period of review in this proceeding is January 2019 through December 2025 ("POR").⁶⁸ U.S. industry data are based on the questionnaire responses of 16 firms believed to account for the majority of domestic production of fresh tomatoes in 2025.⁶⁹ U.S. import data and related information are based on the U.S. Department of Commerce's ("Commerce") official import statistics and the questionnaire responses of 82 U.S. importers of fresh tomatoes that staff believes to have accounted for 77.6 percent of subject U.S. imports and 73.5 percent of U.S. imports of fresh tomatoes from all sources in 2025.⁷⁰ Foreign industry data and related information are based on the questionnaire responses of 213 producers and exporters of fresh tomatoes in Mexico accounting for a small amount of total production of fresh tomatoes, with reported exports to the United States accounting for 69.9 percent of subject imports.⁷¹

III. Changed Circumstances Sufficient to Warrant Modification Do Not Exist

Parties seeking revocation argue that several changed circumstances exist that warrant revocation of the order, as they did in their request for changed circumstances review. They allege the following as changed circumstances: (1) changes in customer preferences resulting in a segmented U.S. market for fresh tomatoes; (2) significant investment by U.S. producers in

⁶⁴ Mastronardi Prehearing Br., EDIS Doc. No. 881786 (May 8, 2026); Mastronardi Posthearing Br., EDIS Doc. No. 883545 (May 28, 2026). *See also* Confidential Report, Memorandum INV-YY-087 (June 16, 2026), as amended by revision memorandum INV-YY-096 (June 23, 2026) ("CR") at Table 1.8; Public Report, *Fresh Tomatoes from Mexico*, Inv. No. 751-TA-30, USITC Pub. 5762 (July 2026) ("PR") at Table 1.8.

⁶⁵ NatureSweet Prehearing Br., EDIS Doc. No. 881781 (May 8, 2026); NatureSweet Posthearing Br., EDIS Doc. No. 883537 (May 28, 2026); NatureSweet Final Comments, EDIS Doc. No. 886236 (June 25, 2026).

⁶⁶ GOM Posthearing Br., EDIS Doc. No. 883508 (May 28, 2026).

⁶⁷ Walmart, a U.S. purchaser of fresh tomatoes, filed written comments opposing continuation of the antidumping duty order. Walmart Comments, EDIS Doc. No. 881739 (May 8, 2026).

⁶⁸ CR/PR at 2.14. To reduce the burden on responding firms, the Commission presented public data for the entire POR but solicited full-year data for calendar years 2019 and 2023-2025. The Commission also solicited data for July through December 2024, before the order issued, and July through December 2025, after the order issued. We also note that import data on the record is current through March 31, 2026. *Id.* at Table 4.2.

⁶⁹ CR/PR at 1.15, 3.1, and Table 1.7.

⁷⁰ CR/PR at 1.15, 4.1. In light of the data coverage provided by questionnaire responses, import data in the review are based primarily on official Commerce statistics for fresh tomatoes. CR/PR at 4.1.

⁷¹ CR/PR at 1.15, 4.16.

greenhouse and other "protected culture" growing facilities outside of California and Florida; (3) major investments by U.S. growers in Mexico to supplement their U.S. tomato production operations; (4) major investments by growers of greenhouse tomatoes from Canada resulting in an increase in imports of nonsubject greenhouse and protected culture tomatoes in the U.S. market; (5) structural challenges facing open-field growers in Florida and California; and (6) and structural challenges facing subject producers/exporters in Mexico.⁷² With the exception of the argument concerning structural challenges faced by subject producers in Mexico, these are substantially the same arguments parties seeking revocation presented in their underlying request. Moreover, several of the changed circumstances alleged in this review were raised by Mexican respondent interested parties as conditions of competition warranting a negative injury determination during the Commission's original investigation. We review below each of the alleged changed circumstances raised by the parties seeking revocation, including the extent to which these circumstances were addressed in the original investigation.

A. Changes in customer preferences resulting in a segmented U.S. market for fresh tomatoes.

a. The Original Investigation

Submissions filed jointly by the same Mexican growers' and exporters' associations participating as "Mexican Associations" in this review, argued in the final phase of the Commission's original investigation that a shift in consumer preference from open-field mature green round tomatoes to protected culture vine-ripe tomatoes, rather than subject imports, drove the decline in the domestic industry's market share from 1996 to 2019.⁷³

The Commission, however, found that domestic and imported tomatoes were highly substitutable, that all varieties of tomatoes were available from domestic and Mexican sources, and that there was evidence mature green tomatoes were interchangeable with vine-ripe tomatoes when each reached the customer.⁷⁴ It rejected Mexican Respondents' argument that competition between U.S. and Mexican fresh tomatoes was attenuated due to differences in growing environment, and found that domestic producers offered the full range of tomato varieties offered by suppliers of subject imports, including open-field and protected culture tomatoes.⁷⁵

⁷² Mexican Respondents Prehearing Br. at 6-44.

⁷³ Mexican Respondents Posthearing Br., EDIS Doc. No. 888617 at 9-14 (Nov. 4, 2019); Mexican Respondents Prehearing Br., EDIS Doc. No. 888616 at 4-11 (Sept. 10, 2019). For clarity, we refer to the arguments presented jointly by these parties in the final phase of the Commission's original investigation as proffered by "Mexican Respondents," and the arguments they present jointly in this review as proffered by "Mexican Associations."

⁷⁴ Original Determination, USITC Pub. 5003 (Dec. 2019) at 30-31, 40-41.

⁷⁵ Original Determination, USITC Pub. 5003 (Dec. 2019) at 40-41.

b. Arguments of the Parties

Arguments in favor of revocation. Parties seeking revocation argue that demand for fresh tomatoes in the U.S. market has shifted away from mature green tomatoes, preferred for their durability and appearance, towards greenhouse-grown tomatoes, including vine-ripe and specialty tomatoes, due to consumer preference for quality and flavor.⁷⁶ They contend that mature green and greenhouse-grown tomatoes are physically distinct, perceived differently by consumers, and are sold in different channels of distribution.⁷⁷ Several of the parties seeking revocation argue, based on two studies appended to each of their briefs, that there is no substitutability between specialty tomatoes on the one hand, and round and Roma tomatoes on the other hand, such that they supply different markets.⁷⁸

Arguments in favor of continuation. FTE submits that the Commission dismissed Mexican Associations' segmentation argument during its original investigation. It characterizes the argument as falsely premised on the proposition that the domestic industry only produces mature green tomatoes, whereas Mexican producers only produce specialty tomatoes. It contends that the various types of tomatoes form a continuum, and U.S. and Mexican producers offer all classes of fresh tomatoes in that continuum.⁷⁹

c. Analysis

Parties seeking revocation have not demonstrated that consumer preferences for vine-ripe or specialty tomatoes as compared to mature green rounds or the substitutability of subject imports and domestic fresh tomatoes have changed in a meaningful way during the

⁷⁶ See, e.g., GoodFarms Posthearing Stmt., Encl.; Mastronardi Prehearing Br. at 17-19; Mastronardi Posthearing Br. at 2-5; NatureSweet Prehearing Br. at 16-19, 26-27; NatureSweet Posthearing Br. at 6-12, Exh. 1, Questions from the Commission, at 6-20, 23-24.

⁷⁷ Mexican Associations Prehearing Br. at 6-7, Atts. 2-3; Mexican Associations Posthearing Br. at 6-7, 15-16, Att. 1, Responses to Commissioner and Staff Questions, at 15-31, 47-51; FPAA Prehearing Br. at 4-16; FPAA Posthearing Br. at 4-8, Answers to Commission Questions, at 5-9.

⁷⁸ Mastronardi and NatureSweet argue, based on a substitution analysis authored by Dr. Timothy Richards of Arizona State University, that there is no substitutability between specialty and greenhouse tomatoes, or between mature green and vine-ripe tomatoes. This analysis examines retail prices of round, cherry, grape, and Roma tomatoes from March 2024 to February 2026, finds that there is a general lack of substitution among tomato categories, and concludes that the specialty tomato segment of the market is highly differentiated. Timothy J. Richards, *Changed Circumstances Review of ITC Decision on Tomato Imports from Mexico* (Apr. 15, 2026), NatureSweet Prehearing Br. at 14-16, Exh. 9; Mastronardi's Prehearing Br., at 9, Exh. 3. Mexican Associations and NatureSweet also refer to an econometric study by Dr. Richards which employs analyses of causation, retail market impact, wholesale market impact, and probability distributions that purport to demonstrate, as a "statistical certainty" that specialty tomatoes do not compete with commodity tomatoes in the same market. Timothy J. Richards, *Changed Circumstances Review of ITC Decision on Tomato Imports from Mexico* (May 6, 2026), NatureSweet Prehearing Br., Exh. 10; Mexican Associations Prehearing Br., Att. 3; Mastronardi's Prehearing Br., Exh. 3.

⁷⁹ FTE Prehearing Br. at 9-13; FTE Posthearing Br. at 3-5.

review period.

The record indicates there was a shift in the consumption of tomato varieties, mainly from rounds to Roma/plum, with rounds' share of total purchases falling by 5.6 percentage points, and Roma/plum tomatoes' share growing by almost the same amount – 5.4 percentage points. The shares of cherry/grape tomatoes and other varieties shifted only slightly, with the shifts largely canceling each other out.⁸⁰ There was not a meaningful shift from mature green to vine-ripe for most varieties. The share of mature green rounds in total purchases fell by roughly the same amount (2.6 percentage points) as vine-ripe rounds (3.0 percentage points), accounting for the total 5.6 percentage point drop for rounds. The shares of mature green cherry/grape tomatoes and vine-ripe cherry/grape both reportedly grew, by roughly the same amount (0.4 percentage points and 0.6 percentage points, respectively).⁸¹ Roma/plum tomatoes were an exception, with mature green Roma/plum tomatoes' share remaining stable and vine-ripe Roma/plum tomatoes gaining 5.4 percentage points; this added share for vine-ripe Roma/plum was taken from rounds, not mature green Roma/plum tomatoes.⁸² Thus, while the record indicates a maximum shift of 2.6 percent of purchases from mature green rounds to vine-ripe Roma/plum tomatoes, it does not substantiate the overarching shift away from mature green tomatoes that the parties seeking revocation have posited.

Responses to our questionnaires indicate that any shift did not result from changes in the competitive relationship between the domestic like product and subject imports. Fourteen of 15 responding U.S. producers, 77 of 81 responding importers, and 21 of 23 responding purchasers reported that inter-country interchangeability between U.S. and Mexican tomatoes had not changed from 2019 to 2025.⁸³ Moreover, 13 of 16 responding U.S. producers, 77 of 81 responding importers, and 19 of 22 responding purchasers reported that there were no changes to interchangeability by growing method during the period of review.⁸⁴

All producers, 71 of 81 responding importers, and 20 of 21 responding purchasers reported no changes to the significance of differences in factors other than price between 2019 and 2025.⁸⁵ The most often cited top three factors firms considered in their purchasing decisions for fresh tomatoes were quality and/or taste (24 firms), price/delivered price (20 firms), and availability/reliable supply (13 firms), with quality the most frequently cited first-most important factor (14 firms), followed by food safety and price (4 firms each).⁸⁶

U.S. producers generally reported that during the review period, the domestic like

⁸⁰ CR/PR at Table 2.3. Cherry/grape tomatoes' share of domestic consumption increased by 1.1 percentage points, while other varieties' share decreased by 0.8 percentage points. *Id.*

⁸¹ CR/PR at Table 2.3.

⁸² CR/PR at Table 2.3.

⁸³ CR/PR at 2.31.

⁸⁴ CR/PR at 2.33.

⁸⁵ CR/PR at 2.38.

⁸⁶ CR/PR at Table 2.11.

product can “always” be used interchangeably with subject imports, while importers reported that they “frequently” or “sometimes” can be used interchangeably.⁸⁷ Purchaser responses were more varied, with 18 firms reporting that U.S. and Mexican fresh tomatoes are “always” or “frequently” interchangeable and five firms that they were “sometimes” interchangeable.⁸⁸ These responses are similar to responses to similar questions in the original investigation.⁸⁹

The record indicates that U.S. producers and suppliers of subject imports produced and shipped vine-ripe and mature green round, Roma/plum, and cherry/grape varieties grown in various environments and packaged into various package types throughout the review period.⁹⁰ Common round and Roma/plum tomatoes accounted for the largest share of U.S. shipments by both domestic producers and importers of subject merchandise.⁹¹ Domestic and subject imports, moreover, are also sold through the same channels of distribution, with most sales for both being made to distributors.⁹²

Conclusion. Parties seeking revocation argue at length that there is little or no competition among different varieties of tomatoes.⁹³ Although the record indicates some

⁸⁷ CR/PR at Table 2.17.

⁸⁸ CR/PR at Table 2.17.

⁸⁹ Original Determination, USITC Pub. 5003 (Dec. 2019) at 30, n.181 (“Twenty of 22 responding U.S. producers, 26 of 49 responding U.S. importers, and 15 of 19 responding purchasers reported that the domestic like product and subject imports are “always” or “frequently” interchangeable.”).

⁹⁰ CR/PR at Tables 3.15-3.17, 4.4-4.6. *See also id.* at Tables 5.3-5.7.

⁹¹ CR/PR at Tables 3.15, 4.5.

⁹² CR/PR at Table 2.2.

⁹³ GoodFarms Posthearing Stmt., Encl.; Mastronardi Prehearing Br. at 17-19; Mastronardi Posthearing Br. at 2-5; NatureSweet Prehearing Br. at 16-19, 26-27; NatureSweet Posthearing Br. at 6-12, Exh. 1 at 6-20, 23-24.

We do not find the two reports authored by Dr. Richards persuasive on the existence of clear dividing lines between product types in the U.S. market. We find that the substitution analysis, which relies on an examination of cross-price elasticities, the law of one price, and a cluster analysis using retail scanner data, does not sufficiently demonstrate a lack of overlap between the so-called specialty and commodity tomatoes. Accordingly, this analysis is not inconsistent with our definition of tomatoes as forming a continuum. *See* Timothy J. Richards, *Changed Circumstances Review of ITC Decision on Tomato Imports from Mexico* (Apr. 15, 2026), NatureSweet Prehearing Br. at 14-16, Exh. 9; Mastronardi’s Prehearing Br., at 9, Exh. 3. Dr. Richards’ econometric study on the tomato market in the United States lacks transparency and has technical issues that likely bias the econometric estimates. Common endogeneity concerns are not addressed in the study. For example, the demand equations do not instrument for prices, and the wholesale market impact model does not address the endogeneity of the total market volume variable. Additional issues include the use of an unconventional explanatory variable (MX Below US) without a clear theoretical basis for its inclusion, the use of several control variables that likely absorb important variation for the identification of the specific explanatory variables of interest, and a limited number of observations that likely impact the econometric estimates. Moreover, the study does not provide data sufficient for replication. Despite these shortcomings with the study, its conclusions are also not inconsistent with our like product definition. *See* Timothy J. Richards, *Changed Circumstances Review of ITC Decision on Tomato Imports from Mexico* (May 6, 2026),

limitations to substitutability among types of tomatoes, it does not support the view that there is none.⁹⁴ In any event, we found in the original investigation that differentiation among types of tomatoes did not prevent competition between the domestic like product and subject imports because U.S. growers produced all types of tomatoes, grew them in all environments, and sold them through all channels of distribution.⁹⁵ That remained true during the review period.⁹⁶ Therefore, the parties seeking revocation have not persuaded us that alleged changes in customer preferences constitute a changed circumstance for purposes of section 751(b) of the Act.

B. Significant investment by U.S. producers in greenhouse and other "protected culture" growing facilities outside of California and Florida.

a. The Original Investigation

In the final phase of the Commission's original investigation, Mexican Respondents argued that the Commission's U.S. industry dataset did not accurately reflect the trade and financial experiences of U.S. greenhouse producers. In their view, U.S. greenhouse producers outperformed U.S. open-field growers during the January 2016 through September 2019 period of investigation ("POI"), and the lack of questionnaire responses from greenhouse producers reflected their healthy performance and general opposition to the antidumping duty petition during the period examined.⁹⁷

The Commission's final report noted that domestic greenhouse tomato production began after 2000, with the U.S. Department of Agriculture's ("USDA") Agricultural Marketing Service ("AMS") indicating that greenhouse-grown shipments grew steadily to 475 million

NatureSweet Prehearing Br., Exh. 10; Mexican Associations Prehearing Br., Att. 3; Mastronardi's Prehearing Br., Exh. 3. In sum, neither study shows clear dividing lines among distinct fresh tomato product types.

Evidence on the record indicating that Roma/plum tomatoes increased their share of total purchases 5.4 percent almost entirely at the expense of rounds suggests that there is in fact a degree of competition among varieties. See CR/PR at Table 2.3.

Moreover, and critically, even if some market segmentation existed between product types, both countries produce all product types, as mentioned above.

⁹⁴ Most U.S. producers reported that round mature green tomatoes are always or frequently interchangeable with all varieties, save for cherry/grape tomatoes. Moreover, while most importers and nearly all purchasers reported that the interchangeability between certain types of tomatoes was limited, majorities of both indicated that round mature green and round vine-ripe were at least sometimes interchangeable, and Roma/plum mature green and Roma/plum vine-ripe were also at least sometimes interchangeable. Likewise, a majority of purchasers reported that cherry/grape mature green and cherry/grape vine-ripe were at least sometimes interchangeable. CR/PR at Tables 2.19-2.20.

⁹⁵ Original Determination, USITC Pub. 5003 (Dec. 2019) at 40-41.

⁹⁶ CR/PR at Tables 3.15-3.17, 4.4-4.6.

⁹⁷ Mexican Respondents Prehearing Br. at 11-13, 31-32.

pounds annually from 2005 to 2012, and constituted more than 5 percent of shipments by 2017.⁹⁸ Domestically grown greenhouse tomatoes accounted for between 11.5 and 12.0 percent of the share of U.S. producers' shipments by quantity from 2016 to 2018, and between 21.6 and 24.7 percent of the share of shipments by value during that period.⁹⁹

b. Arguments of the Parties

Arguments in favor of revocation. Parties seeking revocation argue that U.S. fresh tomato greenhouse growers are largely insulated from competition with imports. They contend that the record data show that producers' large investments in protected-culture production facilities outside of California and Florida during the review period resulted in U.S. greenhouse producers' share of domestic shipments growing to more than a third of the overall U.S. market, and up to half of the retail segment of the market.¹⁰⁰ NatureSweet asserts that a substantial number of U.S. greenhouses did not respond to the Commission's questionnaires, so that greenhouse growers have a greater share of domestic production than the Commission's data indicate.¹⁰¹

Arguments in favor of continuation. FTE argues that greenhouses are overrepresented in the Commission's U.S. industry dataset. It asserts, based on USDA data, that U.S. greenhouse fresh tomato production declined by 37 percent from 2019 to 2024.¹⁰²

c. Analysis

The data in the original investigation indicated that greenhouse-grown tomatoes accounted for approximately one-tenth of the volume of U.S. shipments, and one-fifth of the value.¹⁰³

In this review, the Commission's domestic producer questionnaires sought U.S. production and shipments data for tomatoes grown in protected culture and controlled environments, which constitute the best information available from the questionnaire responses on greenhouse production in the United States.¹⁰⁴ The responses indicate that

⁹⁸ Original Determination, USITC Pub. 5003 (Dec. 2019) at III-10 n.11.

⁹⁹ Original Determination, USITC Pub. 5003 (Dec. 2019) at Table III-9.

¹⁰⁰ Mexican Associations Prehearing Br. at 8-13, Att. 5; Mexican Associations Posthearing Br. at 4-5; NatureSweet Posthearing Br., Exh. 1 at 1-3, 22-23. In contrast to NatureSweet, FPAA characterizes the volume of U.S. greenhouse production as small, but growing. Posthearing Br., Answer to Commission Questions, at 4.

¹⁰¹ NatureSweet Posthearing Br., Exh. 1 at 22-23.

¹⁰² FTE Prehearing Br. at 13-16; FTE Posthearing Br. at 6-7, Exh. 1, Responses to Commissioner Questions, at 1-4.

¹⁰³ Original Determination at 13, 30, and 40.

¹⁰⁴ CR/PR at Tables 3.8A-3.8B. In this review, controlled environment hydroponic tomatoes are defined as "tomatoes grown using hydroponic systems in a fully enclosed, permanent structure," whereas protected culture tomatoes are defined as "tomatoes grown using a production structure or

controlled environment hydroponic fresh tomatoes accounted for *** percent of the share of U.S. producers' shipments by quantity in 2025, an increase from their *** percent share in 2019. By value, they accounted for *** percent of U.S. shipments in 2025, up from *** percent in 2019.¹⁰⁵ Protected culture fresh tomatoes accounted for *** percent of the share of U.S. producers' shipments by quantity in 2025, down slightly from *** percent in 2019. By value, they accounted for *** percent of U.S. shipments in 2025, down slightly from *** percent in 2019.¹⁰⁶

USDA data, however, indicate that fresh tomatoes grown under protection accounted for 13.3 percent of the domestic industry's production in 2024, down from 19.1 percent in 2019, and that hydroponic tomatoes accounted for 9.1 percent of the industry's production in 2024, down from 11.6 percent in 2019.¹⁰⁷ USDA data thus indicate a downward trend through most of the POR, opposite to what the questionnaire data show. They also suggest that U.S. greenhouse producers are overrepresented in our questionnaire responses, as the total amount of greenhouse production of fresh tomatoes reported by U.S. greenhouses in response to our questionnaires, *** pounds in 2024, accounts for approximately four-fifths of the volume of tomatoes grown under protection indicated in USDA's 2024 census data, whereas the *** pounds of fresh tomatoes reported by all U.S. producers in response to our questionnaires accounts for approximately three-fifths of overall production indicated in USDA data.¹⁰⁸

Conclusion. On the whole, responses to our questionnaires and USDA's Census data suggest that during the review period, greenhouse tomatoes represented a larger share of U.S. production volume than during the original investigation, but point in different directions on trends since 2019. Regardless, the volume remained relatively small in comparison to open-field tomatoes. Parties seeking revocation have not persuaded us that this information indicates that greenhouse production in the United States grew during the review period to an extent that it represents a changed circumstance for purposes of section 751(b) of the Act.

covering system that provides more than minimal protection from weather, pests, or disease and enables material modification of the growing environment (e.g., temperature, humidity, light, or precipitation exposure) and/or greater control over water and nutrient delivery than open-field production. Protected culture includes both fully enclosed permanent greenhouses/controlled-environment facilities and partially enclosed or semi-permanent structures (e.g., high tunnels/hoop houses, shade/net houses, rain shelters)." *Id.* at 1.20 n.54. See also blank U.S. producer's questionnaire at 3, EDIS Doc. No. 874351 (Mar. 4, 2026).

¹⁰⁵ CR/PR at Table 3.14.

¹⁰⁶ CR/PR at Table 3.14.

¹⁰⁷ Derived from USDA's Vegetable and Pulses Yearbook (updated Dec. 30, 2025) at Table 41, filed in FTE Posthearing Br., Exh. 6, USDA 2019 Census of Horticulture Specialties (Dec. 2020) at Table 15, filed in FTE Posthearing Br., Exh. 7, and USDA 2024 Census of Horticulture Specialties at Table 15.

¹⁰⁸ Derived from CR/PR at Table 3.9 and USDA 2024 Census of Horticulture Specialties (Feb. 2026) at Table 15, filed in FTE Posthearing Br., Exh. 8.

We also note that although several U.S. greenhouse producers oppose continuation of the order, our questionnaire data indicate that the unit values of controlled environment hydroponic and protected culture tomatoes declined by *** and *** percent, respectively, during the POR.¹⁰⁹ Further, the record indicates that these greenhouse producers generally reported declining financial performance indicators, including with respect to gross profit, operating income, and net income during the period.¹¹⁰ These trends, as FTE contends, are inconsistent with any increase in demand for specialty greenhouse tomatoes and may suggest head-to-head competition with low-priced subject imports that entered under the suspension agreement.¹¹¹

Therefore, the record does not support the contention of parties seeking revocation that U.S. greenhouses are insulated from the effects of subject imports or that there has been a meaningful change in the relative presence of greenhouse tomato production in the United States. In fact, contrary to certain of these parties' contention that subject imports allow U.S. greenhouses to re-invest in their domestic production operations,¹¹² the available record information indicates that the financial condition of reporting U.S. greenhouse fresh tomato producers generally worsened during the period examined.¹¹³ Therefore, were we to conclude that the record indicated that greenhouse tomato production increased to a meaningful degree, we would remain unpersuaded by the assertion by parties seeking revocation that this segment of the market is insulated or otherwise benefits from subject imports.

C. Major investments by U.S. growers in Mexico to supplement their U.S. tomato production operations.

a. The Original Investigation

In the final phase of the Commission's original investigation, Mexican Respondents argued that several U.S. producers, including FTE members Pacific Tomato Growers, Lipman Family Farms, Procacci Brothers (operating as Garguilo in this review), and DiMare Company, either invested in growing operations in Mexico or developed distribution networks from Mexico to supply tomatoes to the U.S. retail segment.¹¹⁴ The Commission found that several

¹⁰⁹ CR/PR at Tables 1.7, 3.14. *** all oppose continuation of the order. *Id.* at Table 1.7.

¹¹⁰ CR/PR at Table 3.30. We note that *** reported improved gross profit and operating income during the POR.

¹¹¹ FTE Posthearing Br. at 5-6.

¹¹² Mastronardi Posthearing Br. at 9, 11-12; NatureSweet Posthearing Br., Exh. 1 at 21-22.

¹¹³ CR/PR at Table 3.30. Reporting greenhouse producers include TLC Farms, Red Sun, Pure Flavor, NatureSweet, Mastronardi, and Windset Farms. *Id.* at Table 1.7. Collectively, these firms accounted for *** percent of U.S. production among responding firms. *Id.*

¹¹⁴ Mexican Respondents Prehearing Br. at 51-52; Mexican Respondents Posthearing Br. at 15.

U.S. producers were related to importers and producers of subject merchandise,¹¹⁵ and that appropriate circumstances existed to exclude two producers, ***, as related parties due to their imports of subject merchandise, or imports by related importers of subject merchandise.¹¹⁶

b. Arguments of the Parties

Arguments in favor of revocation. Parties seeking revocation argue that domestic production of greenhouse-grown tomatoes is insufficient to meet year-round demand, which has prompted several U.S. producers, including FTE members Lipman Family Farms, Pacific Tomato Group, Gargiulo, and DiMare Company, to invest in greenhouse production facilities in Mexico to meet the ensuing supply gaps and develop North American supply chains.¹¹⁷

Arguments in favor of continuation. FTE argues that U.S. growers' decisions to invest in Mexican production operations were necessitated by increased competition from low-priced subject imports, rather than a desire to expand fresh tomato product offerings to include greenhouse-grown tomatoes. It cites to the experiences of U.S. greenhouse producers West Coast Tomato Growers and Ag-Mart, who have planned to relocate or have already relocated production to Mexico, respectively, due to pressure from subject imports.¹¹⁸

c. Analysis

The record indicates that several U.S. producers during the review period were related to importers and producers of subject merchandise.¹¹⁹ Seven domestic producers either reported importing subject merchandise, or reported imports by related importers of subject merchandise.¹²⁰ The volume of subject imports reported by these producers or their related importers exceeded that reported by domestic producers subject to exclusion as related parties in the original investigation, driven primarily by subject imports by U.S. greenhouse producers or their related importers.¹²¹ These data indicate that linkages between the domestic and subject industries have intensified since the original investigation, particularly with respect to

¹¹⁵ Confidential Report, INV-RR-122 (Nov. 14, 2019), EDIS Doc. No. 882933 at Table III-2.

¹¹⁶ Original Determination, USITC Pub. 5003 (Dec. 2019) at 15-17; Confidential Original Determination at 20-24.

¹¹⁷ Mexican Associations Prehearing Br. at 15-22; Mexican Associations Posthearing Br., Att. 1 at 56-59; Mastronardi Prehearing Br. at 23-24, 26-29; Mastronardi Posthearing Br. at 7-11; NatureSweet Prehearing Br. at 20-22; NatureSweet Posthearing Br., Exh. 1 at 4-5; FPAA Posthearing Br., Answers to Commission Questions, at 5.

¹¹⁸ FTE Prehearing Br. at 16-18. Ag-Mart indicates in its foreign producer questionnaire response that ***. See Ag-Mart Produce S de RL de CV Foreign Producer Questionnaire Response at 1-4b(i), EDIS Doc. No. 876915 (Mar. 30, 2026).

¹¹⁹ CR/PR at Table 1.8.

¹²⁰ CR/PR at Tables 3.19-3.25.

¹²¹ Compare CR/PR at Tables 3.19-3.25 with INV-RR-122 at Table III-12.

U.S. greenhouse producers and greenhouse tomato producers in Mexico.¹²² However, there is less support for the claim by parties seeking revocation that U.S. open-field growers, who continue to represent the bulk of domestic production, have also turned to subject imports to supplement their domestic production operations.

Data reported by U.S. growers *** indicate that each firm's ratio of subject imports to U.S. production was either low or declined during the review period.¹²³ Although importers related to *** reported that subject imports were intended to supplement U.S. production, due to seasonality or as part of their longer-term procurement strategies, these low ratios indicate that any change was not meaningful.¹²⁴

Conclusion. The Commission found in the original investigation that a number of U.S. producers were related to Mexican producers or importers of subject merchandise. The record in this review indicates that the linkages between domestic and subject producers have

¹²² ***, ***, and *** reported ratios of subject imports to domestic production that exceeded *** percent during the POR. CR/PR at Tables 3.21, 3.23, and 3.25.

¹²³ The ratio of subject imports entered by ***, *** affiliated importer, to *** U.S. production ranged between *** to *** percent during the POR, CR/PR at Table 3.19, whereas *** ratio ranged between *** and *** percent, *id.* at Table 3.0, and *** ratio was *** percent in 2023 and *** percent in 2024, *id.* at Table 3.24. *** ratio declined from *** percent in 2019 to *** percent in 2025. *id.* at Table 3.22. Among responding firms, these U.S. producers accounted for *** percent of domestic production in 2025. *id.* at Table 1.7.

Mexican Associations allege that certain importers, purchasers, and foreign producers related to FTE members Lipman Family Farms, Gargiulo, and DiMare Enterprises, failed to file questionnaires in this review. They argue that the Commission should find, as adverse facts available, that the purchases and imports missing from the Commission's questionnaire dataset were non-injurious, and that termination of the antidumping order will not injure the producers whose related entities failed to respond in full to the Commission's questionnaires. Mexican Associations Posthearing Br., Att. 1 at 65-68.

We decline Mexican Associations' invitation to apply adverse facts available with respect to the non-responding entities or their affiliated U.S. producers. Mexican Associations fail to identify any legal basis for us to draw conclusions of law as adverse facts available. If the Commission decides to exercise its discretion and apply an adverse inference, the statute plainly states that it does so "*in selecting from among the facts otherwise available*." Such adverse inference may include reliance on information derived from – (1) the petition, (2) a final determination in the investigation under this subtitle, (3) any previous review under section 1675 of this title or determination under section 1675b of this title, or (4) any other information placed on the record." 19 U.S.C. § 1677e(b) (emphasis added). *See also* SAA at 870. The CIT has held that an adverse inference drawn by the Commission must be supported by substantial evidence. *Elkem Metals Co. v. United States*, 276 F. Supp.2d 1296 (Ct. Int'l Trade 2003).

These domestic producers' responses to our questionnaires provide evidence sufficient for us to address the parties' arguments regarding their operations in Mexico. We find, therefore, that their Mexican affiliates' failure to respond to our foreign producer, importer, and purchaser questionnaires does not justify taking an adverse inference.

¹²⁴ CR/PR at Table 3.26. *See also* FTE Prehearing Br. at 18, Exhs. 4, 6, 7, 8, Tr. at 174-178 (Singh). The record also indicates that *** related importer, ***, turned to subject imports after shuttering its domestic greenhouse production operations due to pressure from low-priced subject imports. *** related importer, ***, reported that it turned to subject imports ***.

intensified since the Commission's final determination, particularly for several U.S. greenhouse producers.¹²⁵ The data also indicate that some open-field growers maintained import operations during the review period to supplement domestic production, but that any imports were a relatively small part of their total U.S. shipments. As all of these conditions were present during the original investigation, albeit to a lesser extent, we find that the intensification of linkages apparent between some domestic producers and importers and producers of subject merchandise represents the continuation of a longer-term trend, rather than a changed circumstance for purposes of section 751(b) of the Act.¹²⁶

D. Major investments by growers of greenhouse tomatoes from Canada resulting in an increase in imports of nonsubject greenhouse and protected culture tomatoes in the U.S. market.

a. The Original Investigation

There were several domestic producers related to importers and producers of nonsubject merchandise in the Commission's original investigation.¹²⁷ Nonsubject imports from Canada accounted for between 8.1 to 9.2 percent of the share of quantity of total U.S. imports during the POI, and between 11.9 and 14.0 percent of value of U.S. imports.¹²⁸ The Commission found that nonsubject imports, primarily from Canada, supplied between 5.4 and 5.8 percent of apparent U.S. consumption during the investigation period.¹²⁹ It found that the quantity of U.S. shipments of nonsubject imports was not significant, and that the record contained no indication that this volume would likely become significant in the imminent future.¹³⁰

¹²⁵ CR/PR at Tables 1.8, 3.21, 3.23, and 3.25. Moreover, we note that *** imported more subject fresh tomatoes from Mexico in each year of the POR than in any yearly period of the POI. *Compare* CR/PR at Table 3.21 *with* INV-RR-122 at Table III-2.

¹²⁶ The Commission has rejected arguments in prior investigations that a negative injury determination is warranted because domestic producers themselves are responsible for a significant volume of subject imports, whether due to a deliberate outsourcing strategy or for other reasons. It has also found that "the legislative history . . . makes clear that when domestic producers import subject product to 'stay in business,' such imports can be evidence of statutorily cognizable injury." *See Steel Propane Cylinders from China and Vietnam*, Inv. Nos. 701-TA-607 and 731-TA-1417 and 1419 (Final), USITC Pub. 4938 at 20 n.113 (Aug. 2019)

¹²⁷ INV-RR-122 at Table III-2.

¹²⁸ INV-RR-122 at Table IV-2.

¹²⁹ Original Determination, USITC Pub. 5003 (Dec. 2019) at 28.

¹³⁰ Original Determination, USITC Pub. 5003 (Dec. 2019) at 40.

b. Arguments of the Parties

Arguments in favor of revocation. Mexican Associations asserted increased production in Canada as a changed circumstance in their request for this review.¹³¹ However, they did not elaborate on that assertion in this review beyond arguing that the substantial and increasing volume of imports of nonsubject imports from Canada indicated that demand for greenhouse tomatoes has surged in recent years.¹³²

Arguments in favor of continuation. FTE argues that the increase in nonsubject imports from Canada since 2019 has been eclipsed by subject imports over the same period, and submits that Canadian fresh tomatoes are priced significantly higher than subject imports.¹³³

c. Analysis

The record indicates that several U.S. producers during the review period are related to importers and producers of nonsubject merchandise from Canada.¹³⁴ Nonsubject imports from Canada accounted for between 8.2 to 10.8 percent of the quantity of total U.S. imports during the review period, and between 12.5 and 17.4 percent of value of U.S. imports.¹³⁵ The record also shows that total nonsubject imports represented between 6.0 and 8.1 percent of apparent U.S. consumption during the review period; nonsubject imports from Canada supplied between 5.5 to 7.6 percent of the U.S. market during this period.¹³⁶ Thus, while nonsubject imports from Canada increased, they did so from a small base and only captured 2.1 percentage points of market share during the period examined. Moreover, average unit values for nonsubject imports from Canada were substantially higher than those reported for subject imports and the domestic like product.¹³⁷

Conclusion. In light of the foregoing, Mexican Associations have not persuaded us that a surge in nonsubject imports of greenhouse-grown tomatoes from Canada constitutes a changed circumstance for purposes of section 751(b) of the Act.

E. Structural challenges facing open-field U.S. growers based in Florida and California.

a. The Original Investigation

In the final phase of the Commission's original investigation, Mexican Respondents argued that U.S. open-field growers in Florida were beset by a series of structural challenges likely to constrain their tomato production capacity in the future, including poor soil conditions,

¹³¹ Bioparques Request at 13-14.

¹³² Mexican Associations Prehearing Br. at 14.

¹³³ FTE Prehearing Br. at 18-19.

¹³⁴ CR/PR at Table 1.8.

¹³⁵ CR/PR at Table 4.1.

¹³⁶ CR/PR at Table 1.16.

¹³⁷ CR/PR at Table C.1. Unit values for nonsubject imports from Canada ranged between \$0.93 to \$1.10 during the POR, whereas unit values for subject imports ranged between \$0.56 and \$0.76 during the period examined, and unit values for the domestic like product ranged between \$0.58 and \$0.87. *Id.*

a lack of irrigation during dry periods, extreme weather conditions, increased pests and diseases, urbanization, and an overly restrictive marketing order prohibiting the sale of several fresh tomato varieties.¹³⁸ In its final determination, the Commission recognized that seasonality and variable and uncontrollable growing conditions, such as drought, storms, freezes, and pests, in both Mexico and the United States, affected the supply of fresh tomatoes in and into the U.S. market. In light of these conditions, which can be counterbalanced somewhat by examining full-year data, the Commission determined to reduce the weight accorded to interim data.¹³⁹

b. Arguments of the Parties

Arguments in favor of revocation. Parties seeking revocation argue that open-field growers in California and Florida are unable to produce consistent yields of fresh tomatoes due to several structural challenges, including adverse weather, labor availability and costs, and a loss of farmland as these states continue to urbanize to accommodate growing populations.¹⁴⁰ They submit that labor shortages in California and Florida have restricted production and the ability to employ seasonal workers to produce fresh tomatoes, particularly the more labor-intensive harvesting needed for vine-ripe tomatoes. They claim that several open-field growers have turned to subject imports to supplement shortages resulting from these challenges.¹⁴¹

Parties seeking revocation also argue that weather is a systemic constraint to production of tomatoes throughout the United States.¹⁴² They contend that drought conditions in California, which resulted in water restrictions in 2024, are likely to return in 2026, thereby further limiting the production of open-field tomatoes.¹⁴³ They submit that severe weather events in Florida since 2019, including hurricanes from 2022 to 2024 and a freeze in early 2026, have devastated the state's agricultural industry and rendered supply uncertain, particularly during winters.¹⁴⁴ Last, they contend that the phase-out of methyl bromide, a key fumigant banned under the Montreal Protocol, and the lack of a substitute fumigant, has resulted in an increase in pests, diseases, and weeds in Florida since 2014.¹⁴⁵

Arguments in favor of continuation. FTE submits that hurricanes in Florida and droughts in California are not new phenomena, and emphasizes that the Commission has long recognized that weather conditions affect the production of tomatoes across the United States

¹³⁸ Mexican Respondents Prehearing Br. at 50-51.

¹³⁹ Original Determination, USITC Pub. 5003 (Dec. 2019) at 29 & n.176.

¹⁴⁰ Mexican Associations Prehearing Br. 22-24, 29-30; Mexican Associations Posthearing Br., Att. 1 at 51-53.

¹⁴¹ NatureSweet Prehearing Br. at 22-24.

¹⁴² Mastronardi Prehearing Br. at 21-24.

¹⁴³ Mexican Associations Prehearing Br. at 31-33.

¹⁴⁴ Mexican Associations Prehearing Br. at 35-36; Mexican Associations Posthearing Br. at 7-8, Att. 1 at 53-56; NatureSweet Prehearing Br. at 25-26; NatureSweet Posthearing Br. at 12-14, Exh. 1 at 11.

¹⁴⁵ Mexican Associations Prehearing Br. at 33-35.

and Mexico.¹⁴⁶ It argues that U.S. producers are able to hire sufficient labor using the U.S. Department of Labor's H2A program, which grants entry to foreign national workers for temporary agricultural work, and contends that the labor shortages and rising input costs impacting U.S. producers reflect suppressive effects of significant quantities of low-priced subject imports, which have prevented the industry from increasing prices to hire more workers and cover rising costs.¹⁴⁷ Last, FTE argues that the record does not support the contention by the parties seeking revocation that urbanization is driving a reduction in open-field farmland.¹⁴⁸

c. Analysis

The record indicates that a minority of U.S. producers and importers experienced supply constraints in connection with the structural challenges alleged by the parties seeking revocation. Five of 16 U.S. producers reported experiencing supply constraints since 2019, and three that they had experienced supply constraints since July 2025, due to weather, diseases, crop loss, low production periods, crop cycles, and capacity constraints during peak demand.¹⁴⁹ Twenty-four of 80 responding importers reported experiencing constraints from 2019 to 2025, and 31 of 78 responding importers reported experiencing constraints since July 2025, due to weather events, failure to reach pricing agreements, crop loss due to disease, and labor migration.¹⁵⁰ Fourteen of 25 purchasers reported that at least one firm refused or was unable to supply them with fresh tomatoes since 2019, and 18 of 20 responding purchasers reported facing constraints due to weather, crop disease, pests, and timing crop cycles.¹⁵¹

The Commission's found in its 1996 preliminary determination that weather is a variable condition of competition affecting both U.S. and Mexican producers' fresh tomato production operations.¹⁵² Information on the record also indicates that Florida experienced several hurricanes since 2019 that affected tomato production and caused agricultural losses ranging from \$32 million to \$204 million.¹⁵³ The record thus substantiates Mexican interested parties' contention that U.S. producers, particularly in Florida, faced weather-related challenges during the review period that hindered their production operations. Data on the record also suggests that the economic costs of weather events in Florida have increased since the original investigation.¹⁵⁴ However, we do not see how this represents a marked change from the original

¹⁴⁶ FTE Prehearing Br. at 19-20; FTE Posthearing Br. at 7. FTE contends that of the 11 major weather events that affected Florida since 2017, only four had significant effects on tomato production and pricing in Florida, and these were short-lived. FTE Posthearing Br., Exh. 1 at 13-14, Exh. 10.

¹⁴⁷ FTE Prehearing Br. at 20-21; FTE Posthearing Br. at 7.

¹⁴⁸ FTE Prehearing Br. at 22-23; FTE Posthearing Br. at 7-8.

¹⁴⁹ CR/PR at 2.11.

¹⁵⁰ CR/PR at 2.11.

¹⁵¹ CR/PR at 2.11.

¹⁵² Preliminary Determination, USITC Pub. 2967 (May 1996) at 18-19.

¹⁵³ CR/PR at Tables 3.1-3.3.

¹⁵⁴ Mexican Associations Posthearing Br. at 7-8, Att. 1 at 53-56

investigation period, when weather events also affected U.S. production.¹⁵⁵ In particular we note that according to respondents' data on the economic costs of such events, California experienced more costly events in the original investigation.¹⁵⁶ To the extent that parties seeking revocation are arguing that weather events were particularly damaging during the review period, we are unpersuaded and we find that a spike in the damage caused by weather events during the POR would not constitute a changed circumstance for purposes of section 751(b) of the Act, as such a spike is not indicative or predictive of any longer-term changes in weather conditions.

The Commission's original determination made no findings with regard to the availability of labor. Several U.S. producers reported production constraints during the review period due to a lack of available labor and rising labor costs, including in connection with hiring under the H2A program.¹⁵⁷ The data indicate that the number of production-related workers ("PRWs") was higher in each year between 2023 and 2025 than in 2019, and in 2025 was 10.2 percent higher than in 2019.¹⁵⁸ However, total hours worked declined irregularly, from a high point of 9,821 thousand hours in 2019 to 9,536 thousand hours in 2025, a decrease of 2.9 percent.¹⁵⁹ Hourly wages increased at a greater rate than productivity, resulting in unit labor costs that increased by 13.5 percent during the review period.¹⁶⁰ Direct labor costs also increased by 38.3 percent.¹⁶¹ Producers' ability to increase the number of PRWs suggests that any limitations on labor availability did not entirely constrain production growth. As FTE submits, domestic producers are able to hire sufficient labor through the H2A and other programs.¹⁶² Parties seeking revocation have accordingly not persuaded us that limitations on labor availability constitute a changed circumstance for purposes of section 751(b) of the Act.¹⁶³

Although the Commission gathered data on U.S. producers' acreage during the original investigation, it did not address this issue in its determination. The record in this review shows that domestic acreage devoted to fresh tomato production in the United States increased by 8.8 percent from 2023 to 2025, while the domestic fresh tomato harvest increased by 12.2 percent,

¹⁵⁵ Original Determination, USITC Pub. 5003 (Dec. 2019) at II-6.

¹⁵⁶ Mexican Associations Posthearing Br. Att. 1 at 54

¹⁵⁷ CR/PR at Table 3.4.

¹⁵⁸ CR/PR at Table 3.27. Domestic producers hired 8.4 percent more workers in 2025 than in 2019. *Id.*

¹⁵⁹ CR/PR at Table 3.27.

¹⁶⁰ CR/PR at Table 3.27. Hourly wages increased by 29.3 percent during the period examined, whereas productivity, measured in pounds per hour, increased by 13.9 percent. *Id.*

¹⁶¹ CR/PR at Table 3.28.

¹⁶² FTE Posthearing Br. at 7, *citing* Tr. at 152 (Spencer).

¹⁶³ In fact, the increases in wages and per-unit labor costs during the review period could suggest that, to the extent labor availability was limited, domestic producers were at least partially able to address that challenge by offering higher wages.

leading to an increase in the volume of fresh tomatoes per acre between 2023 and 2025.¹⁶⁴ Moreover, 11 of 16 responding U.S. producers reported that land availability did not change between 2019 and 2025.¹⁶⁵ Thus, the parties seeking revocation have not persuaded us that a reduction in arable farmland in the United States as a result of urbanization is changed circumstance for purposes of section 751(b) of the Act.¹⁶⁶

Finally, the record does not support for Mexican Associations' assertion that the lack of a substitute fumigant for methyl bromide has resulted in an increase in pests, diseases, and weeds in Florida since 2014. The ban on methyl bromide went into effect prior to the second five-year review of the suspended investigation, and was accordingly a factor affecting domestic production during the original investigation.¹⁶⁷ The record lacks indication that this preexisting circumstance created greater difficulties during the review period than during the original investigation period.¹⁶⁸ In particular, although some U.S. producers reported that brown rugose fruit virus forced them to discard some production they represent a small minority of domestic production.¹⁶⁹ The record thus lacks indication that disease or pest-related events during the review period constitute a changed circumstances for purposes of section 751(b) of the Act.

Conclusion. In sum, although the record substantiates the contention by the parties seeking revocation that subject producers faced adverse weather and labor constraints that hindered their production operations during the POR, they have not persuaded us that these developments rise to the level of changed circumstances for purposes of section 751(b) of the Act.

¹⁶⁴ CR/PR at Table 2.4.

¹⁶⁵ CR/PR at 2.8.

¹⁶⁶ We acknowledge that USDA data referenced by Mexican Associations indicate that U.S. acreage planted and acreage planted declined from 2022 to 2024, driven by declines in California and Florida. See Mexican Associations Prehearing Br. at 24, *citing* [USDA's Vegetables 2024 Summary](#) (Feb. 2025) at 72. Nevertheless, these data also indicate that yield per acre and total production increased during this period. *Id.* Thus, these declines did not impact the domestic industry's ability to produce more tomatoes during this segment of the review period.

¹⁶⁷ Methyl bromide was banned as of 2005 in the United States and, as noted above, was fully phased out beginning in 2014. See Mexican Associations Prehearing Br. at 33.

¹⁶⁸ Indeed, we note that Mexican Associations' contention that "to date, no such alternative {to methyl bromide} has been found" relies on a public health journal article dated December 2011. See Mexican Associations Prehearing Br. at 33 n.92.

¹⁶⁹ CR/PR at Table 3.3. *** reported brown rugose fruit virus as a change in operations during the review period. *Id.* They collectively represented *** percent of domestic production in 2025. *Calculated from* Table 3.30. Moreover, they are all producers of greenhouse-grown fresh tomatoes. *** indicates that a change in regulations has made it unnecessary to destroy tomatoes affected by the virus, while *** reports that virus-resistant seeds are now available. *Id.* and CR/PR at 2.38.

F. Structural challenges facing subject producers/exporters in Mexico.

a. The Original Investigation

In its final determination, the Commission recognized that tomato production in Mexico was subject to seasonality and variable and uncontrollable growing conditions, such as drought, storms, freezes, and pests.¹⁷⁰ It nevertheless found that despite any restraining effect these constraints and the 2013 Suspension Agreement may have had on the production or prices of tomatoes, the volume of subject imports increased 4.5 percent, and the share of apparent U.S. consumption supplied by subject imports increased by 2.7 percentage points.¹⁷¹ The Commission found the volume, and rate of increase of the volume, of subject imports significant.¹⁷² It also found, based on questionnaire data, that the volume of subject merchandise was likely to increase significantly in the imminent future, that the subject industry was export oriented, and that the United States was its key export market. It thus concluded that the record indicated a likelihood of substantially increased imports of subject merchandise into the United States in the imminent future.¹⁷³

b. Arguments of the Parties

Arguments in favor of revocation. Parties seeking revocation argue that tomato producers in Mexico face structural challenges that have limited their ability to expand tomato production imminently. These include drought conditions affecting several growing regions in 2024; a structural decline in available farm labor caused by increased urbanization, declining birth rates, competition from non-agricultural jobs, and increased regional violence and associated travel risks; increased freight costs; unfavorable exchange rate movements; and disruptions from the illicit drug trade.¹⁷⁴

Arguments in favor of continuation. FTE argues that the record demonstrates that the volume of subject imports is likely to be significant upon revocation of the order. It contends that claims by the parties seeking revocation that the Mexican industry is constrained by a variety of structural issues are not supported by the record, which continues to demonstrate

¹⁷⁰ Original Determination, USITC Pub. 5003 (Dec. 2019) at 29 & n.176.

¹⁷¹ Original Determination, USITC Pub. 5003 (Dec. 2019) at 32.

¹⁷² Original Determination, USITC Pub. 5003 (Dec. 2019) at 32.

¹⁷³ Original Determination, USITC Pub. 5003 (Dec. 2019) at 33-35.

¹⁷⁴ Mexican Associations Prehearing Br. at 35-44; Mexican Associations Posthearing Br. at 8-10. GOM and FPAA also address structural changes in the Mexican tomato market. GOM submits that labor conditions in the Mexican market have changed since 2019 due to an increase to the minimum wage for farm workers and increased labor protections for workers, including with respect to access to water. GOM Posthearing Br. at 7-9, Annex. Implicit in GOM's argument is that these changes will result in higher production costs for subject producers. FPAA submits that a water crisis necessitating the scaling down of agricultural production operations across the country, a lack of available farmworkers, the minimum wage increase, and a declining birth rate, have restricted the subject industry's ability to ramp up fresh tomato production. FPAA Posthearing Br., Answers to Commission Questions, at 9-10.

that the Mexican industry is large, possesses substantial unused capacity, and is export oriented, with the United States remaining Mexico's top export market.¹⁷⁵

c. Analysis

The Commission found in the original investigations that drought, storms, freezes, and pests were "variable and uncontrollable growing conditions" that potentially limit tomato production in the United States and Mexico.¹⁷⁶ Parties seeking revocation argue that drought, the decrease in available farm labor, increased freight costs, unfavorable exchange rate movements, and disruptions from the illicit drug trade restrained production during the review period, and will continue to do so in the future.¹⁷⁷

The record indicates that during the review period, drought conditions affected several growing regions in Mexico from 2022 to 2024, with nearly 76 percent of the country experiencing drought conditions as of July 2024.¹⁷⁸ However, the Commission identified drought as a potential limitation to tomato production in the original investigation and the record in this review does not indicate drought conditions to a degree that appears to meaningfully change the Mexican industry's ability to export tomatoes relative to its abilities in the original investigation, so the occurrence of droughts during the review period does not represent a changed circumstance for purposes of section 751(b) of the Act.

Several responding importers also reported that constraints on practical production capacity in Mexico in connection with growing/harvesting bottlenecks, available labor, raw materials, fuel, energy, storage capacity, and logistics/transportation.¹⁷⁹ Despite these constraints, subject imports from Mexico increased irregularly from 3.7 billion pounds in 2019 to 4.0 billion pounds in 2023, 4.2 billion pounds in 2024, and 4.0 billion pounds in 2025, for an overall increase of 8 percent during the POR.¹⁸⁰ As a share of apparent U.S. consumption, subject imports increased irregularly from 60.8 percent in 2019 to 62.5 percent in 2023, 65.1 percent in 2024, and 61.5 percent in 2025, for an overall increase of 0.8 percentage points.¹⁸¹ Thus, despite any restraining effect of the structural challenges alleged by the parties seeking revocation, the volume of subject imports increased by 8 percent, and the share of apparent U.S. consumption supplied by subject imports increased by 0.8 percentage points.

Responding Mexican producers/exporters accounted for a small proportion of the fresh tomatoes industry in Mexico.¹⁸² However, their questionnaire responses remain the best

¹⁷⁵ FTE Prehearing Br. at 30-35, 44-47; FTE Posthearing Br. at 10-11.

¹⁷⁶ Original Determination at 29.

¹⁷⁷ Mexican Associations Prehearing Br. at 35-44; Mexican Associations Posthearing Br. at 8-10
FPAA Posthearing Br., Answers to Commission Questions, at 9-10

¹⁷⁸ CR/PR at Table 4.10.

¹⁷⁹ CR/PR at Table 4.13.

¹⁸⁰ CR/PR at Table 4.1.

¹⁸¹ CR/PR at Table 1.16.

¹⁸² CR/PR at 1.15.

information available with respect to the volume of production in Mexico. These data indicate that production in the growing regions in Mexico increased by 20.7 percent during the POR, from 3.3 billion pounds in 2019 to 4.0 billion pounds in 2025.¹⁸³ The available data also indicate that the subject industry's capacity is large and expanding. Responding subject producers reported that acreage assigned to "fresh tomatoes only" increased from surface area sufficient to grow 27.8 million pounds in 2019 to surface area sufficient to grow 37.1 million pounds in 2025, for an overall increase of 33.4 percent. Comparable figures for acreage assigned to "fresh tomatoes and other crops" increased from 16.0 million pounds in 2019 to 17.0 million pounds in 2025, for an overall increase of 6.6 percent.¹⁸⁴ Consistent with these data, 75 firms reported new acreage planted since 2019, and 41 firms reported new acreage planted since 2025, versus 21 firms that reported acreage taken out of production from 2019 to 2025, and 45 firms reporting acreage taken out since 2025.¹⁸⁵

Conclusion. The record substantiates the contention by the parties seeking revocation that subject producers faced challenges during the review period that would tend to hinder their production operations. However, the available data show that these challenges did not prevent the Mexican industry from increasing its domestic tomato production and its tomato exports to the United State. The industry is still large, and Mexico remained the largest exporter of fresh tomatoes in the world during the period examined. The United States remains the largest export destination, accounting for between 99.5 and 99.9 percent of Mexico's exports of fresh tomatoes under HS subheading 0702.00 during the POR.¹⁸⁶

Thus, to the extent that any of these challenges were heightened during the review period, they did not prevent Mexican exports to the United States from increasing. Therefore, the parties seeking revocation have not persuaded us that structural challenges limiting the expansion of the Mexican industry constitute a changed circumstance for purposes of section 751(b) of the Act.

G. Overall Conclusion

We have also considered whether taken together, if the alleged changes result in changed circumstances. As described above many of the alleged changed circumstances were present in prior segments of the original investigation and represent a continuation of trends seen during that investigation rather than a change in circumstances that would meaningfully affect the analysis of whether revocation of the order would not be likely to lead to a significant increase in imports from Mexico. Indeed, Mexico's share of apparent U.S. consumption, in terms of volume, during the period of review was greater than at the end of the original

¹⁸³ CR/PR at Tables 4.11, 4.19.

¹⁸⁴ CR/PR at Table 4.16.

¹⁸⁵ CR/PR at Table 4.12.

¹⁸⁶ CR/PR at Tables 4.24-4.25.

investigation.¹⁸⁷ The parties seeking revocation have not persuaded us that these alleged changed circumstances, taken together, constitute a changed circumstance for purposes of section 751(b) of the Act.

The Commission found in its determination to institute this review that the parties seeking revocation had alleged the existence of changed circumstances that warranted review.¹⁸⁸ Having conducted that review, we are not persuaded that the facts collected demonstrate that the changed circumstances alleged in the request for this review or over the course of this review exist. There is accordingly no need for further inquiry into whether revocation of the order or finding is likely to lead to continuation or recurrence of material injury.

IV. Conclusion

For the above reasons, we determine that changed circumstances sufficient to warrant revocation of the antidumping duty order on fresh tomatoes from Mexico do not exist.

¹⁸⁷ CR/PR at Table C.1.

¹⁸⁸ *Fresh Tomatoes From Mexico; Institution and Scheduling of Review Investigation Concerning the Commission's Affirmative Determination in Investigation No. 731-TA-747 (Final), Fresh Tomatoes From Mexico*, 91 Fed. Reg. 3,216, 3,217 (Jan. 26, 2026).

Part 1: Introduction

Background

On May 9, 2025, the U.S. International Trade Commission (“Commission” or “USITC”) received a request to review its affirmative determination in antidumping duty investigation No. 731-TA-747 (Final), pursuant to section 751(b) of the Act (19 U.S.C. § 1675(b)).¹ The request was filed by the Bioparques de Occidente, S.A. de C.V., Agrícola La Primavera, S.A. de C.V., and Kaliroy Fresh, LLC (collectively, the “Bioparques Group” or “Requestors” or “Mexican Producers and Exporters”). Requestors argued that the Commission should conduct a changed circumstances review of the Commission’s affirmative threat of material injury determination regarding fresh tomatoes from Mexico if the September 19, 2019 Suspension Agreement signed by the U.S. Department of Commerce (“Commerce”) and certain growers/exporters of fresh tomatoes from Mexico (“*2019 Suspension Agreement*”) expired without continuation on July 14, 2025. No antidumping duty order had issued on fresh tomatoes from Mexico due to suspension agreements signed between Commerce and certain growers/exporters of fresh tomatoes from Mexico in 2002, 2008, 2013, and 2019. Commerce withdrew from and terminated the *2019 Suspension Agreement* and issued an antidumping duty order on imports of fresh tomatoes from Mexico, effective July 14, 2025. On January 26, 2026, after reviewing the comments it received in response to the Bioparques Group’s request, the Commission determined that it had received information which showed changed circumstances sufficient to warrant instituting a review investigation.² Table 1.1 presents information relating to the background and schedule of this proceeding.³

¹ 19 U.S.C. 1675(c).

² 91 FR 3216, January 26, 2026. Chair Karpel determined that the changed circumstances alleged by Mexican respondent interested parties in their request for a review are not sufficient to warrant institution of a review under section 751(b). Commissioner Kearns determined that the changed circumstances alleged by Mexican respondent interested parties are sufficient to warrant institution of a review under section 751(b). Commissioner Johanson did not participate in this proceeding. As one half of the number of Commissioners voting agreed that the review should be initiated, the Commission instituted that review. *Id.* at n.1. Moreover, the Commission determined that the additional analysis needed to consider the asserted changed circumstances and cure data collected in its fifth review of the suspended final phase antidumping investigation constituted good cause to exercise its authority to waive the institution period pursuant to section 207.45(c) of the Commission’s Rules of Practice and Procedure (19 CFR 207.45(c)). *Id.* at n.2.

³ The Commission’s notice of institution and scheduling is referenced in appendix A and may also be found at the Commission’s web site (internet address www.usitc.gov). Appendix B presents the witnesses appearing at the Commission’s hearing.

Table 1.1 Fresh tomatoes: Information relating to the background and schedule of this proceeding

Effective date	Action
July 14, 2025	Commerce's antidumping duty order on fresh tomatoes from Mexico (90 FR 33363, July 17, 2025)
January 26, 2026	Commission's institution of changed circumstances review (91 FR 3216)
May 19, 2026	Commission's hearing
June 30, 2026	Commission's vote
July 20, 2026	Commission's determination and views

Note: The period between the request by the Bioparques Group and the Commission's institution of the subject review included a lapse in appropriations and ensuing cessation of Commission operations.

The original investigation

The original investigation resulted from a petition filed on April 1, 1996, with Commerce and the Commission, by the Florida Tomato Growers Exchange, Orlando, Florida; the Florida Fruit and Vegetable Association, Orlando, Florida; the Florida Farm Bureau Federation, Gainesville, Florida; the South Carolina Tomato Association, Inc., Charleston, South Carolina; the Gadsden County Tomato Growers Association, Inc., Quincy, Florida; the Accomack County Farm Bureau, Accomack, Virginia; the Florida Tomato Exchange, Orlando, Florida; the Florida Department of Agriculture and Consumer Services, Tallahassee, Florida; and the Ad Hoc Group of Florida, California, Georgia, Pennsylvania, South Carolina, Tennessee, and Virginia Tomato Growers.⁴ Effective November 1, 1996, Commerce suspended its antidumping duty investigation on imports of fresh tomatoes from Mexico.⁵ Effective the same day, the Commission suspended the final phase of its investigation.⁶

The first five-year review

On October 1, 2001, Commerce initiated and the Commission instituted their first sunset and five-year reviews, respectively, of the suspended investigations.⁷ After the withdrawal from the suspension agreement by certain Mexican tomato growers, Commerce terminated the suspension agreement, and both Commerce and the Commission terminated their respective reviews and resumed their antidumping duty investigations, effective July 30, 2002.⁸ On December 16, 2002, Commerce and the Commission suspended their resumed

⁴ 61 FR 15968, April 10, 1996.

⁵ 61 FR 56618, November 1, 1996.

⁶ 61 FR 58217, November 13, 1996.

⁷ 66 FR 49926 and 49975, October 1, 2001.

⁸ 67 FR 50858, August 6, 2002; 67 FR 53361, August 15, 2002; and 67 FR 56854, September 5, 2002.

investigations when Commerce signed a new suspension agreement with certain growers/exporters of fresh tomatoes from Mexico.⁹

The second five-year review

On November 1, 2007, Commerce initiated and the Commission instituted their second sunset and five-year reviews, respectively, of the suspended investigations.¹⁰ Once again, based on the withdrawal from the suspension agreement by certain Mexican tomato growers, Commerce terminated the suspension agreement, and both Commerce and the Commission terminated their respective reviews and resumed their antidumping duty investigations, effective January 18, 2008.¹¹ The resumed antidumping duty investigations were again suspended by Commerce and the Commission when Commerce signed a new suspension agreement with certain growers/exporters of fresh tomatoes from Mexico, effective January 22, 2008.¹²

The third five-year review

On December 1, 2012, Commerce initiated and the Commission instituted their third sunset and five-year reviews, respectively, of the suspended investigations.¹³ Based on the withdrawal from the suspension agreement by certain Mexican tomato growers/exporters, Commerce terminated the suspension agreement and its third five-year review of the suspended investigation, and resumed its investigation, effective March 1, 2013.¹⁴ On March 4, 2013, the Commission terminated its review of the suspended investigation and resumed the final phase of its investigation.¹⁵ Also on March 4, 2013, Commerce signed a new agreement with certain growers/exporters of fresh tomatoes from Mexico, and again suspended its resumed investigation.¹⁶ Accordingly, on March 5, 2013, the Commission suspended its resumed final phase investigation.¹⁷

⁹ 67 FR 77044, December 16, 2002; and 67 FR 78815, December 26, 2002.

¹⁰ 72 FR 61861 and 61903, November 1, 2007.

¹¹ 73 FR 2887, January 16, 2008; and 73 FR 5869, January 31, 2008.

¹² 73 FR 4831, January 28, 2008; and 73 FR 7762, February 11, 2008.

¹³ 77 FR 71629 and 71684, December 3, 2012.

¹⁴ 78 FR 14771, March 7, 2013.

¹⁵ 78 FR 16529, March 15, 2013.

¹⁶ 78 FR 14967, March 8, 2013.

¹⁷ 78 FR 16530, March 15, 2013.

The fourth five-year review

On February 1, 2018, Commerce initiated and the Commission instituted their fourth sunset and five-year reviews, respectively, of the suspended investigations.¹⁸ On December 27, 2018, Commerce determined that termination of the suspended investigation would be likely to lead to continuation or recurrence of dumping.¹⁹ Because a new suspension agreement had not been signed, Commerce terminated the 2013 suspension agreement and resumed its antidumping duty investigation, effective May 7, 2019.²⁰ Also on May 7, 2019, the Commission terminated its review of the suspended investigation and resumed the final phase of its investigation.²¹ On September 19, 2019, Commerce signed the *2019 Suspension Agreement* with certain growers/exporters of fresh tomatoes from Mexico, and again suspended its resumed investigation.²² Accordingly, on September 24, 2019, the Commission suspended its resumed final phase investigation.²³

Resumption of the final phase investigation

Following requests submitted by the Florida Tomato Exchange and by Red Sun Farms Virginia LLC, Commerce received timely requests to continue its resumed final investigation and effective October 25, 2019 determined that imports of fresh tomatoes from Mexico were being sold at less than fair value (“LTFV”).²⁴ Effective October 17, 2019, the Commission, therefore, continued its antidumping investigation and gave notice of its revised schedule.²⁵ On October 25, 2019, Commerce determined that fresh tomatoes from Mexico are being, or are likely to be, sold in the United States at LTFV.²⁶ On December 9, 2019, the Commission determined that the domestic industry was threatened with material injury by reason of LTFV imports of fresh tomatoes from Mexico.²⁷ Under the *2019 Suspension Agreement*, if the Commission made an affirmative material injury or threat of material injury determination, the *2019 Suspension*

¹⁸ 83 FR 4641 and 4676, February 1, 2018.

¹⁹ 83 FR 66680, December 27, 2018.

²⁰ 84 FR 20858, May 13, 2019.

²¹ 84 FR 21360, May 14, 2019; and 84 FR 27805, June 14, 2019.

²² 84 FR 49987, September 24, 2019.

²³ 84 FR 54639, October 10, 2019.

²⁴ 84 FR 57401, October 25, 2019.

²⁵ 84 FR 56837, October 23, 2019.

²⁶ 84 FR 57401, October 25, 2019.

²⁷ 84 FR 67958, December 12, 2019; and Fresh Tomatoes from Mexico, Inv. No. 731-TA-747 (Final), USITC Publication 5003, December 2019 (“Original publication”), p. 1.

Agreement would remain in force.²⁸ Consequently, Commerce did not issue its antidumping duty order on fresh tomatoes from Mexico and the investigation remained suspended.²⁹

The fifth five-year review

On August 1, 2024, Commerce initiated its fifth sunset review of the suspended investigation, and the Commission instituted a five-year review of the suspended investigation.³⁰ ³¹ On November 4, 2024, the Commission determined that it should proceed to a full review in the subject five-year review.³² Following a request filed by the Florida Tomato Exchange on June 16, 2023, Commerce announced its intention to terminate the *2019 Suspension Agreement* on April 18, 2025.³³ Subsequently, effective July 14, 2025, Commerce withdrew from and terminated the *2019 Suspension Agreement* and issued an antidumping duty order on imports of fresh tomatoes from Mexico.³⁴ For this reason, the Commission terminated its five-year review effective July 14, 2025.³⁵

Due to the number of suspension agreements entered into during the prior antidumping proceeding, pertinent case history for the antidumping (as published in Federal Register notices) is summarized in the tabulation below (table 1.2).

²⁸ 84 FR 57401, October 25, 2019.

²⁹ 84 FR 57401, October 25, 2019.

³⁰ 89 FR 62717, August 1, 2024.

³¹ 89 FR 62786, August 1, 2024.

³² 90 FR 13626, March 25, 2025.

³³ 90 FR 16499, April 18, 2025.

³⁴ 90 FR 33363, July 17, 2025.

³⁵ 90 FR 35933, July 30, 2025.

Table 1.2 Fresh tomatoes: Case history

Date	Action	Agency	Federal Register cite
April 10, 1996	Institution of investigation	ITC	61 FR 15968
April 25, 1996	Initiation of investigation	ITA	61 FR 18377
June 6, 1996	Preliminary determination – Affirmative	ITC	61 FR 28891
November 1, 1996	Preliminary determination – Affirmative	ITA	61 FR 56608
November 1, 1996	Final determination suspended	ITA	61 FR 56618
November 13, 1996	Suspension of investigation	ITC	61 FR 58217
October 1, 2001	Initiation/Institution of five-year (sunset) review	ITA & ITC	66 FR 49926 66 FR 49975
January 23, 2002	Determination to conduct full review	ITC	67 FR 3229
June 27, 2002	Notice of intent to terminate suspension agreement and review and resume antidumping investigation	ITA	67 FR 43278
August 6, 2002	Review terminated	ITA	67 FR 50858
December 16, 2002	Investigation suspended	ITA	67 FR 77044
December 26, 2002	Investigation suspended	ITC	67 FR 78815
November 1, 2007	Initiation/Institution of review	ITA & ITC	72 FR 61903
December 13, 2007	Notice of intent to terminate suspension agreement and review and resume antidumping investigation	ITA	72 FR 70820
January 16, 2008	Notice of termination of suspension agreement and review and resumption of antidumping investigation	ITA	73 FR 2887
January 28, 2008	Notice of suspension of antidumping investigation	ITA	73 FR 4831
February 11, 2008	Suspension of investigation	ITC	73 FR 7762
October 2, 2012	Preliminary results and intent to terminate investigation	ITA	77 FR 60103
December 3, 2012	Initiation/Institution of review	ITA & ITC	77 FR 71683 77 FR 71629
February 1, 2013	Notice of intent to terminate suspension agreement and review and resume antidumping investigation	ITA	78 FR 9366
March 7, 2013	Termination of suspension agreement and review and resumption of antidumping investigation	ITA	78 FR 14771
March 8, 2013	Suspension of antidumping investigation	ITA	78 FR 14967
March 15, 2013	Termination of review and resumption of antidumping investigation	ITC	78 FR 16529
March 15, 2013	Suspension of antidumping investigation	ITC	78 FR 16530
February 1, 2018	Initiation/Institution of review	ITA & ITC	83 FR 4641 83 FR 4676
March 5, 2019	Notice of intent to terminate suspension agreement and resume antidumping investigation	ITA	84 FR 7872
May 7, 2019	Termination of suspension agreement and review and resumption of antidumping investigation	ITA	84 FR 20858

Continued on next page.

Table 1.2 Fresh tomatoes (continued): Case history

Date	Action	Agency	Federal Register cite
May 7, 2019	Termination of review, resumption of antidumping investigation, and scheduling final phase of investigation	ITC	84 FR 21360 84 FR 27805 84 FR 38643
August 30, 2019	Revised scheduling of its investigation	ITC	84 FR 46756
September 19, 2019	Suspension of its investigation	ITA	84 FR 49987
September 24, 2019	Suspension of its investigation	ITC	84 FR 54639
October 17, 2019	Continuation and revised scheduling of its investigation	ITC	84 FR 56837
October 25, 2019	Final determination of sales at LTFV	ITA	84 FR 57401
December 12, 2019	Commission determination of threat of material injury	ITC	84 FR 67958
August 1, 2024	Initiation/Institution of review	ITA & ITC	89 FR 62717 89 FR 62786
November 4, 2024	Commission notice to conduct full review	ITC	90 FR 13626
April 18, 2025	Intent to terminate suspension agreement, rescind an administrative review, and issue an antidumping duty order	ITA	90 FR 16499
July 14, 2025	Imposition of antidumping duty order	ITA	90 FR 33363
January 26, 2026	Institution of changed circumstances review	ITC	91 FR 3216

Source: Cited *Federal Register* notices.

Previous and related investigations

The Commission has conducted a number of previous import relief investigations on fresh tomatoes or similar merchandise, as presented in table 1.3.

Table 1.3

Fresh tomatoes: Previous and related Commission proceedings and current status

Date	Number	Country	ITC original determination	Current status
1995	TA-201-64	Global	---	Petition withdrawn; investigation terminated, effective 5/4/1995.
1996	TA-201-66	Global	Negative	No safeguard measure imposed.
2001	731-TA-925	Canada	Negative	No order issued.

Source: U.S. International Trade Commission publications and Federal Register notices.

Note: “Date” refers to the year in which the investigation was instituted by the Commission.

Note: The scope of the 1995 safeguard investigation was defined more narrowly, while the scope of the 1996 safeguard investigation was defined more broadly, than the scope of the current proceeding. The scope of the 2001 antidumping duty investigation was defined more narrowly than the scope of the current proceeding, namely by excluding greenhouse tomatoes.

Summary data

Table 1.4 presents a summary of data from the preliminary phase of the original investigation (1995), the prehearing stage of the first review of the original investigation (2001), the resumed final phase investigation (2018), and the current changed circumstances reviews (2025). Due to the timing of the series of suspension agreements, data were not collected and cured after the suspension of the first review of the original investigation in 2001.

Tomatoes are the most widely grown and the leading processing vegetable³⁶ crop in the United States.³⁷ Leading producers of fresh tomatoes in the United States includes Gargiulo, Inc. (“Gargiulo”), Lipman Family Farms (“Lipman”), and Pacific Tomato Growers. Leading producers of fresh tomatoes in Mexico includes Agroexportadora Del Noroeste, Group Ceuta, and Productora Agricola Industrial del Noroeste (“Productora Agricola”). Production in Mexico

³⁶ Botanically, tomatoes are considered fruits, however, in the United States, tomatoes are considered vegetables. <https://www.smithsonianmag.com/smart-news/even-supreme-court-maintains-tomato-vegetable-180963133/>

³⁷ Terry and Boyhan, “History, Significance, Classification and Growth,” Commercial Tomato Production Handbook. <http://extension.uga.edu/publications/detail.html?number=B1312&title=Commercial%20Tomato%20Production%20Handbook>

is less concentrated than in the United States, with at least 213 growers, none of which exceeded 5.0 percent of total production in Mexico in 2025. The leading U.S. importers of fresh tomatoes from Mexico are *** and ***. The leading importer of fresh tomatoes from nonsubject country Canada is ***. U.S. purchasers of fresh tomatoes are firms that are supermarkets or retail chains, food service or restaurants, and packers and repackers. Leading purchasers include ***, ***, and ***.

Apparent U.S. consumption of fresh tomatoes totaled approximately 6.5 billion pounds (\$4.2 billion) in 2025. U.S. producers' U.S. shipments of fresh tomatoes totaled nearly 2.0 billion pounds (\$1.3 billion) in 2025, and accounted for 30.3 percent of apparent U.S. consumption by quantity and 29.9 percent by value. U.S. imports from Mexico totaled nearly 4.0 billion pounds (\$2.4 billion) in 2025 and accounted for 61.5 percent of apparent U.S. consumption by quantity and 56.8 percent by value. U.S. imports from nonsubject sources totaled 521.4 million pounds (\$564.9 million) in 2025 and accounted for 8.1 percent of apparent U.S. consumption by quantity and 13.3 percent by value.

The table below depicts terminal year data from the preliminary phase of the original investigation, the prehearing stage of the first review of the original investigation, the final phase of the original investigation, and the current proceeding. Data for the second and third reviews were unavailable due to the termination of those reviews, and data for the terminal year of the fourth review (2017) are closely reflected in the data for the final phase of the original investigation (2018). Table 1.5 presents historical U.S. apparent consumption from 2020 to 2022.

Table 1.4 Fresh tomatoes: Comparative data from the preliminary investigation, first review of the suspended investigation, final investigation, and current proceeding

Quantity in pounds; value in 1,000 dollars; unit values in dollars per pound; shares in percent.

Item	Measure	1995 (preliminary investigation)	2001	2018 (final investigation)	2025
Apparent U.S. consumption	Quantity	4,363,682	5,045,499	6,737,766	6,424,333
U.S. producers market share	Share of quantity	68.6	65.4	39.3	30.3
Mexico market share	Share of quantity	30.0	28.3	55.4	61.5
Nonsubject market share	Share of quantity	1.4	6.3	5.4	8.1
Import market share	Share of quantity	31.4	34.6	60.7	69.7
Apparent U.S. consumption	Value	1,270,167	1,585,402	1,432,587	4,233,190
U.S. producers market share	Share of value	59.1	50.5	36.6	29.9
Mexico market share	Share of value	35.6	31.5	55.0	56.8
Nonsubject market share	Share of value	5.4	18.0	8.4	13.3
Import market share	Share of value	40.9	49.5	63.4	70.1
Mexico	Quantity	1,307,479	1,429,240	3,729,998	3,953,320
Mexico	Value	451,555	500,088	2,156,830	2,404,333
Mexico	Unit value	\$0.32	\$0.35	\$0.58	\$0.61
Nonsubject sources	Quantity	61,430	318,243	362,211	521,362
Nonsubject sources	Value	68,093	284,707	329,243	564,927
Nonsubject sources	Unit value	\$1.11	\$0.89	\$0.91	\$1.08
All import sources	Quantity	1,368,908	1,747,483	4,092,209	4,474,682
All import sources	Value	579,679	784,796	2,486,074	2,969,260
All import sources	Unit value	\$0.45	\$0.45	\$0.61	\$0.66

Table continued

Table 1.4 Fresh tomatoes (continued): Comparative data from the preliminary investigation, first review of the suspended investigation, final investigation, and current proceeding

Quantity in pounds; value in 1,000 dollars; unit values in dollars per pound; shares in percent.

Item	Measure	1995 (preliminary investigation)	2001	2018 (final investigation)	2025
Production	Quantity	3,284,000	3,696,200	1,585,706	1,356,683
Producer U.S. shipments	Quantity	2,994,774	3,298,016	2,645,556	1,949,651
Producer U.S. shipments	Value	750,524	800,607	1,432,587	1,263,929
Producer U.S. shipments	Unit value	\$0.25	\$0.29	\$0.54	\$0.65
Production workers (number)	Noted in label	4,902	11,817	11,375	11,089
Hours worked (in 1,000 hours)	Noted in label	2,529	14,089	25,003	9,536
Wages paid (1,000 dollars)	Value	18,349	112,581	313,746	168,358
Hourly wages (dollars per hour)	Value	\$7.26	\$7.99	\$12.55	\$17.65
Productivity (pounds per hour)	Noted in label	427	262	63	142
Net sales	Quantity	1,106,482	1,507,797	1,563,693	1,301,569
Net sales	Value	199,340	415,003	862,101	820,441
Net sales	Unit value	\$0.18	\$0.28	\$0.55	\$0.63
Cost of goods sold	Value	184,744	—	771,436	817,608
Gross profit or (loss)	Value	14,596	—	90,665	2,833
SG&A expense	Value	17,443	379,403	102,268	83,943
Operating income or (loss)	Value	(20,831)	18,471	(11,603)	(81,110)
Unit COGS	Unit value	\$0.17	—	\$0.49	\$0.63
Unit operating income	Unit value	\$(0.02)	\$0.01	\$(0.01)	\$(0.06)
COGS/ Sales	Ratio	92.7	—	89.5	99.7
Operating income or (loss)/ Sales	Ratio	(10.4)	4.5	(1.3)	(9.9)

Source: USITC publications; *Fresh Tomatoes from Mexico*, Inv. No. 731-TA-747 (Preliminary), USITC Publication 2967, May 1996 ("Preliminary publication"), App. C., *Fresh Tomatoes from Mexico*, INV-Z-194 (December 3, 2002), Original publication, App. C., official U.S. import statistics, *USDA Vegetables and Pulses Yearbook*, and compiled from data submitted in response to Commission questionnaires.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Data for 1995 are from the last year of the preliminary investigation; data for 2001 are from the last year of the first review; and data for 2018 are from the last year of the final investigation.

Table 1.5 Fresh tomatoes: Historical apparent U.S. consumption, by period and source

Quantity in pounds; shares in percent

Source	Measure	2020	2021	2022
U.S. producers	Quantity	1,996,538	2,075,764	2,138,695
Mexico	Quantity	3,678,550	3,866,877	3,981,913
Canada	Quantity	333,519	367,875	348,540
All other sources	Quantity	40,749	41,585	38,307
Nonsubject sources	Quantity	374,269	409,460	386,846
All import sources	Quantity	4,052,819	4,276,337	4,368,759
All sources	Quantity	6,049,357	6,352,102	6,507,454
U.S. producers	Share	33.0	32.7	32.9
Mexico	Share	60.8	60.9	61.2
Canada	Share	5.5	5.8	5.4
Subject sources	Share	0.7	0.7	0.6
Nonsubject sources	Share	6.2	6.4	5.9
All import sources	Share	67.0	67.3	67.1
All sources	Share	100.0	100.0	100.0

Source: Compiled from USDA Vegetable and Pulses Yearbook and official U.S. imports statistics of the U.S. Department of Commerce using the HTS statistical reporting numbers listed for fresh tomatoes in footnote 2 of this report, accessed June 10, 2026. Imports are based on the imports for consumption data series. Imports value data reflect the landed duty-paid value.

Statutory criteria

Section 751(b)(2)(A) of the Act states that when the Commission conducts a changed circumstances review pertaining to an antidumping and countervailing duty order or finding, it shall “determine whether revocation of the order or finding is likely to lead to continuation or recurrence of material injury.”

Section 752(a) of the Act sets forth standards concerning the Commission's determination of likelihood of continuation recurrence of material injury in changed circumstances reviews. These are the same standards applicable to five-year reviews. Section 752(a) of the Act provides that in making in determination of likelihood of continuation or recurrence of material injury--

(I) IN GENERAL.— . . . the Commission shall determine whether revocation of an order, or termination of a suspended investigation, would be likely to lead to continuation or recurrence of material injury within a reasonably foreseeable time. The Commission shall consider the likely volume, price effect, and impact of imports of the subject merchandise on the industry if the order is revoked or the suspended investigation is terminated. The Commission shall take into account—

(A) its prior injury determinations, including the volume, price effect, and impact of imports of the subject merchandise on the industry before the order was issued or the suspension agreement was accepted,

(B) whether any improvement in the state of the industry is related to the order or the suspension agreement,

(C) whether the industry is vulnerable to material injury if the order is revoked or the suspension agreement is terminated, and

(D) in an antidumping proceeding . . . , (Commerce's findings) regarding duty absorption . . .

(II) VOLUME. —In evaluating the likely volume of imports of the subject merchandise if the order is revoked or the suspended investigation is terminated, the Commission shall consider whether the likely volume of imports of the subject merchandise would be significant if the order is revoked or the suspended investigation is terminated, either in absolute terms or relative to production or consumption in the United States. In so doing, the Commission shall consider all relevant economic factors, including—

(A) any likely increase in production capacity or existing unused production capacity in the exporting country,

(B) existing inventories of the subject merchandise, or likely increases in inventories,

(C) the existence of barriers to the importation of such merchandise into countries other than the United States, and

(D) the potential for product-shifting if production facilities in the foreign country, which can be used to produce the subject merchandise, are currently being used to produce other products.

(III) PRICE. —In evaluating the likely price effects of imports of the subject merchandise if the order is revoked or the suspended investigation is terminated, the Commission shall consider whether--

(A) there is likely to be significant price underselling by imports of the subject merchandise as compared to domestic like products, and

(B) imports of the subject merchandise are likely to enter the United States at prices that otherwise would have a significant depressing or suppressing effect on the price of domestic like products.

(IV) IMPACT ON THE INDUSTRY.—In evaluating the likely impact of imports of the subject merchandise on the industry if the order is revoked or the suspended investigation is terminated, the Commission shall consider all relevant economic factors which are likely to have a bearing on the state of the industry in the United States, including, but not limited to—

(A) likely declines in output, sales, market share, profits, productivity, return on investments, and utilization of capacity,

(B) likely negative effects on cash flow, inventories, employment, wages, growth, ability to raise capital, and investment, and

(C) likely negative effects on the existing development and production efforts of the industry, including efforts to develop a derivative or more advanced version of the domestic like product.

The Commission shall evaluate all such relevant economic factors . . . within the context of the business cycle and the conditions of competition that are distinctive to the affected industry.

Section 752(a)(6) of the Act states further that in making its determination, “the Commission may consider the magnitude of the margin of dumping or the magnitude of the net countervailable subsidy. If a countervailable subsidy is involved, the Commission shall consider information regarding the nature of the countervailable subsidy and whether the subsidy is a subsidy described in Article 3 or 6.1 of the Subsidies Agreement.”

Organization of report

Information obtained during the course of the proceeding that relates to the statutory criteria is presented throughout this report. A summary of trade and financial data for fresh tomatoes as collected in the original investigations, prior reviews, and the current changed circumstances review is presented in appendix C. U.S. industry data are based on the questionnaire responses of all responding U.S. producers of fresh tomatoes that are believed to have accounted for the majority of domestic production of fresh tomatoes in 2025. U.S. import data and related information are based on Commerce’s official import statistics and the questionnaire responses of 82 U.S. importers of fresh tomatoes that are believed to have accounted for 77.6 percent of the total subject U.S. imports during 2025. Foreign industry data and related information are based on the questionnaire responses of 213 producers of fresh tomatoes. Two hundred and thirteen producers in Mexico accounted for a small amount of total production submitted by questionnaire responses. Responses by U.S. producers, importers, purchasers, and foreign producers of fresh tomatoes to a series of questions concerning the significance of the existing antidumping duty order and the likely effects of revocation of this order is presented in appendix D.

Commerce's reviews³⁸

Scope rulings

On February 18, 2026, Commerce published the final clarification of the scope of the antidumping duty order with respect to fresh tomatoes from Mexico.³⁹ On April 2, 2026, Commerce published an extension of deadline to certify regarding the final clarification of the scope of the antidumping duty order by April 15, 2026 (with the clarification being the importers' processing tomatoes certification form must be submitted at the time of entry).⁴⁰

Table 1.6 presents the dumping margins calculated by Commerce in its amended final determination in the continued antidumping duty investigation.⁴¹

Table 1.6 Fresh tomatoes: Commerce's original dumping margins for producers/exporters in Mexico

Producer/exporter	Weighted average dumping margin (percent)
San Vincente Camalu	2.81
Ernesto Fernando Echavarria Salazar Grupo Solidario	26.39
Adminstradora Horticola Del Tamazula	18.58
Arturo Lomeli Villalobas S.A. de C.V.	273.43
Ranchos Los Pinos S. de R.L. de C.V.	273.43
Agricola Yory, S. de P.R. de R.I.	273.43
Eco-Cultivos S.A. de C.V.	273.43
All others	17.09

Source: 90 FR 33363, July 17, 2025.

³⁸ Commerce has not conducted any changed circumstances review or scope rulings since the termination of the *2019 Suspension Agreement*. In addition, Commerce has not issued any duty absorption findings, any company revocations, anti-circumvention findings since the imposition of the antidumping duty order.

³⁹ 91 FR 7439, February 18, 2026; *Fresh Tomatoes from Mexico: Final Clarification of the Scope of the Antidumping Duty Order*.

⁴⁰ 91 FR 16639, April 2, 2026, *Fresh Tomatoes from Mexico: Extension of Deadline to Certify*.

⁴¹ 90 FR 33363, July 17, 2025.

The subject merchandise

Commerce's scope

In the current proceeding, Commerce has defined the scope as follows:⁴²

The merchandise subject to the *Order* is all fresh or chilled tomatoes (fresh tomatoes) which have Mexico as their origin, except for those tomatoes which are for processing. For purposes of the *Order*, processing is defined to include preserving by any commercial process, such as canning, dehydrating, drying, or the addition of chemical substances, or converting the tomato product into juices, sauces, or purees. Further, imports of fresh tomatoes for processing must be accompanied by an "Importer's Exempt Commodity Form" (SC-6) (within the meaning of [Z CFR 980.501\(a\)\(2\)](#) and [980.212\(i\)](#)) and must be accompanied by the "Processing Tomatoes Certification Form." Fresh tomatoes that are imported for cutting up, not further processing (*e.g.*, tomatoes used in the preparation of fresh salsa or salad bars) are covered by the *Order*, whether or not accompanied by an SC-6 form.

Commercially grown tomatoes, both for the fresh market and for processing, are classified as *Lycopersicon esculentum*. Important commercial varieties of fresh tomatoes include common round, cherry, grape, plum, greenhouse, and pear tomatoes, all of which are covered by the *Order*.

Tomatoes imported from Mexico covered by the *Order* are classified under the following subheading of the Harmonized Tariff Schedule of the United States (HTSUS), according to the season of importation: 0702. Although the HTSUS numbers are provided for convenience and customs purposes, the written description of the scope of the *Order* is dispositive.

⁴² 91 FR 7439, February 18, 2026.

Tariff treatment

Fresh tomatoes are currently provided for in the Harmonized Tariff Schedule of the United States (“HTS”) subheadings 0702.00.20, 0702.00.40, and 0702.00.60. The general rate of duty is 3.9 cents/kilogram for HTS subheading 0702.00.20 and 2.8 cents/kilogram for HTS subheadings 0702.00.40 and 0702.00.60. HTS subheading 0702.00.20 covers entries during the period from March 1 to July 14, inclusive, or the period from September 1 to November 14, inclusive, in any year (i.e., periods associated with peak U.S. harvests). HTS subheadings 0702.00.40 and 0702.00.60 cover entries during non-peak harvest periods; entries from July 15 to August 31, inclusive, in any year are covered under subheading 0702.00.40 and entries from November 15, in any year, to the last day of the following February, inclusive, are covered under subheading 0702.00.60.⁴³ Decisions on the tariff classification and treatment of imported goods are within the authority of U.S. Customs and Border Protection.

Pursuant to the United States-Mexico-Canada Agreement (“USMCA”), originating goods of Mexico under HTS general note 11 (i.e., those grown, cultivated, harvested, picked or gathered in the territory of Mexico, even if grown from seed, bulbs, rootstock, cuttings, slips or other live parts of plants imported from a non-USMCA country) are eligible for duty-free entry.⁴⁴

Fresh tomatoes originating from Mexico are not subject to additional tariffs. Below is a historical summary of additional tariffs introduced in 2025 and 2026, although they are not applicable to this investigation, as of April 13, 2026.

Section 122 tariffs

Fresh tomatoes originating in Mexico are not subject to tariffs initiated in February 2026 under section 122 of the Trade Act of 1974.⁴⁵

⁴³ USITC, HTS (2026) Revision 9, Publication 5747, May 2026, pp. 7.3 to 7.5.

⁴⁴ See HTS general note 11 subdivisions (a)(i) and (b) for more details on duty treatment for goods originating from the territory of a USMCA country, accompanied by definitions provided in subdivisions (l)(iv)(2) and (n)(iii). USITC, HTS (2026) Revision 9, Publication 5747, May 2026, pp. GN.28, GN. 29, GN.44, GN.49.

⁴⁵ Fresh tomatoes were included in a list of products not subject to section 122 tariffs. Section 122 authorizes the President to impose a temporary import surcharge for a period not exceeding 150 days unless such period is extended by an Act of the Congress. 91 FR 9339, February 25, 2026. See also HTS heading 9903.03.03 and U.S. note 2(aa)(ii) to subchapter 3 of chapter 99 and related tariff provisions for this duty treatment. USITC, HTS (2026) Revision 9, Publication 5747, May 2026, pp. 99.3.51 to 99.3.55, and 99.3.404.

Tariffs initiated under the International Emergency Economic Powers Act (“IEEPA”)⁴⁶

Effective February 20, 2026, all tariffs initiated under IEEPA were terminated. Below is a history of the IEEPA tariffs relevant to fresh tomatoes originating in Mexico that were in effect until February 20, 2026.⁴⁷

Country specific IEEPA tariffs

Effective March 4, 2025, fresh tomatoes originating in Mexico were subject to an additional 25 percent ad valorem duty under IEEPA. Effective March 7, 2025, products originating in Mexico that enter with duty free treatment under the USMCA were not subject to the additional 25 percent ad valorem duty under IEEPA.⁴⁸ Effective February 20, 2026, tariffs initiated under IEEPA and the associated duties imposed under IEEPA were terminated.⁴⁹

Tariffs initiated in April 2025 under IEEPA

Fresh tomatoes originating in Mexico were not subject to tariffs initiated in April 2025 under IEEPA.⁵⁰ Effective February 20, 2026, tariffs initiated under IEEPA and the associated duties imposed under IEEPA were terminated.⁵¹

⁴⁶ Multiple tariffs were enacted under the authority of the International Emergency Economic Powers Act (“IEEPA”), including tariffs that applied to countries that are not subject to this proceeding. Tariffs specific to Canada, China, and Mexico were initiated in February 2025. Tariffs initiated in April 2025 under IEEPA were applied globally. Tariffs specific to Brazil were initiated in July 2025. Tariffs specific to India were initiated in August 2025 and terminated effective February 7, 2026. Tariffs under IEEPA were amended over time. All tariffs initiated under IEEPA were terminated effective February 20, 2026. 91 FR 9437, February 25, 2026.

⁴⁷ 91 FR 9437, February 25, 2026.

⁴⁸ 90 FR 9117, February 7, 2025; 90 FR 9185, February 10, 2025; 90 FR 11787, March 11, 2025. See also HTS headings 9903.01.01 and 9903.01.04 and U.S. note 2(a) to subchapter 3 of chapter 99 and related tariff provisions for this duty treatment. USITC, HTS (2026) Revision 9, Publication 5747, May 2026, pp. 99.3.1, 99.3.366.

⁴⁹ 91 FR 9437, February 25, 2026.

⁵⁰ Fresh tomatoes were included in a list of products in HTS U.S. note 2(v)(iii)(a) to subchapter III of chapter 99 that are not subject to tariffs initiated in April 2025 under IEEPA. 90 FR 15041, April 7, 2025. See also HTS headings 9903.01.25 and 9903.01.32 and U.S. note 2(v)(iii)(a) to subchapter 3 of chapter 99 and related tariff provisions for this duty treatment. Furthermore, imports originating in Mexico were exempt from tariffs initiated in April 2025 under IEEPA. 90 FR 15041, April 7, 2025. See also HTS headings 9903.01.25 and 9903.01.27 and U.S. note 2(v) to subchapter 3 of chapter 99 and related tariff provisions for this duty treatment. USITC, HTS (2026) Revision 9, Publication 5747, May 2026, pp. 99.3.4 to 99.3.41, 99.3.368 to 99.3.369.

⁵¹ 91 FR 9437, February 25, 2026.

The product

Description and applications⁵²

Tomatoes are the most widely grown and the leading processing vegetable⁵³ crop in the United States. Tomatoes are perishable, edible fruits classified as *Lycopersicon esculentum*, that belong to the *Solanaceae*, or Nightshade, family, which includes potatoes, peppers, and ground cherries (tomatillo).

Tomato producers plant different varieties based on end use (processed or fresh) and growing method (protected or open field).⁵⁴ The vast majority of tomato production in the

⁵² Unless otherwise noted, this information is based on Fresh Tomatoes from Mexico (Final), USITC Publication 5003, December 2019 (“Final publication”), pp. I.17–23.

⁵³ Botanically, tomatoes are considered fruits, however, in the United States, tomatoes are considered vegetables.

⁵⁴ The agreed upon definitions for this changed circumstances review are as follows:

“Open field tomatoes” are tomatoes grown outdoors without protective structures (other than minimal or temporary covers used solely for weather or pest mitigation and not constituting a production structure);

“Protected culture tomatoes” are tomatoes grown using a production structure or covering system that provides more than minimal protection from weather, pests, or disease and enables material modification of the growing environment (e.g., temperature, humidity, light, or precipitation exposure) and/or greater control over water and nutrient delivery than open-field production. Protected culture includes both fully enclosed permanent greenhouses/controlled-environment facilities and partially enclosed or semi-permanent structures (e.g., high tunnels/hoop houses, shade/net houses, rain shelters);

“Controlled-environment hydroponic tomatoes” are defined as tomatoes grown using hydroponic systems in a fully enclosed, permanent structure (e.g., aluminum or fixed steel frame clad in glass, polycarbonate, or impermeable plastic) designed to materially control the growing environment, including active heating and/or active cooling;

“Mature green tomato” is a tomato that has fully grown and developed, but has not begun ripening naturally at the time of harvest with the skin appearing completely green in color (USDA Agricultural Marketing Service (AMS) defines this as stage 1 of the ripening process, also known as the “green mature” stage; University of Florida further disaggregates stage 1 into sub-stages M1–M4). The tomato is not producing ethylene gas naturally and thus requires exposure to an external source of ethylene to begin the ripening process (i.e., has reached stage 2, also known as the “breakers” stage, according to USDA AMS);

“Vine ripe tomato” is a fully grown and developed tomato that has been picked after the ripening process has begun (i.e., has reached at least stage 2 of the ripening process, also known known as the “breakers” stage, according to USDA AMS). The tomato is naturally producing ethylene gas and does not require an external source of ethylene to continue ripening. The skin of the tomato will show a definitive break from a completely green color (refer to the “breakers,” “turning,” “pink,” “light red” and “red” stages in the unofficial diagram on pg. 16 of the USDA AMS guidelines);

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United States (more than 99 percent in 2025) is further processed.⁵⁵ Varieties destined for further processing, which includes canning, dehydrating, drying, the addition of chemical substances, or converting the tomato product into juices, sauces, or purees, tend to be meatier, while varieties destined to the fresh market tend to be juicier. Commercial fresh tomatoes include common round (including beefsteak), cherry, grape, plum/Roma, and pear types.⁵⁶ Each of these types can be grown in an open field or in a protected environment—including greenhouses, shade houses, and tunnels—with plants that are tailored to that growing method.

Most of the fresh tomatoes grown in the United States are grown in California and Florida. In 2025, California accounted for 97 percent of total U.S. open field tomato production by volume and about 74 percent by value, while Florida was responsible for just over 3 percent of total production by volume and 26 percent by value.⁵⁷ In terms of tomato grown “under protection,” Ohio was the largest producer in 2024, followed by California and Texas.⁵⁸

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“Specialty tomatoes” include fresh tomatoes other than standard mature green and standard vine-ripe round tomatoes, including, but not limited to, cherry, grape, cocktail, heirloom, and similar differentiated varieties that are typically marketed based on variety, size, flavor profile, appearance, or production attributes rather than solely by maturity stage.

Brecht et al., “Handling Florida Tomatoes—Round and Roma Types,”

<https://ask.ifas.ufl.edu/publication/VH079>, retrieved April 28, 2026; USDA, AMS, *United States Standards for Grades of Fresh Tomatoes*,

https://www.ams.usda.gov/sites/default/files/media/Tomato_Standard%5B1%5D.pdf, January 1997; *Unofficial Tomato Visual Aid*,

https://www.ams.usda.gov/sites/default/files/media/Tomato_Visual_Aids%5B1%5D.pdf, November 1990.

⁵⁵ USDA, NASS, “Vegetables: 2025 Summary,” <https://esmis.nal.usda.gov/sites/default/release-files/795772/vegean26.pdf>, February 2026, p. 73.

⁵⁶ Tomato sizes are, generally, small (usually cherry and grape tomatoes weighing up to 4 or 5 ounces), medium (usually common round or plum/Roma tomatoes weighing from 4 to 7 or 8 ounces), large (usually common round tomatoes weighing from 8 ounces to 2 pounds) and extra large (usually common round tomatoes weighing over 2 pounds). Although some tomato varieties are known by their sizes, there are differences within varieties. For example, cherry tomatoes are considered small tomatoes, but some cherry tomato varieties can be considered medium size and weigh up to 6 ounces (such as the Sub Arctic Plenty or Cherry Pink tomato varieties). Moreover, certain varieties can yield fruits that range from one size to the other, such as the Black Zebra variety, which is a plum/Roma tomato that yields small to medium-sized fruit. Furthermore, some tomato varieties can be described as more than one type of tomato, such as the Santa Cruz Kada variety, which is classified as a pear tomato but described as being a “pear/plum/paste” tomato, and Campari tomatoes, which can be classified as globe-shaped plum tomatoes.

⁵⁷ USDA, NASS, “Quickstats,” <https://quickstats.nass.usda.gov/>, accessed April 23, 2026.

⁵⁸ In the 2024 Census of Horticultural Specialties by USDA NASS, food crops grown “under protection” (for the purposes of this paragraph) include those grown hydroponically or under glass or other

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However, U.S. production of both open field tomatoes and those grown under protection decreased between 2019 and 2024, with the former having fallen by nearly 2 percent in volume and the latter having fallen nearly 37 percent.⁵⁹

Most of Florida's tomato crop is grown in the open field. Open field tomatoes can be categorized as mature green, which are tomatoes that are picked at an earlier stage of development when they are mature in size but wholly green in color, or vine ripe, which are tomatoes that ripen and start to turn red while still on the vine. Other than color, mature green tomatoes are essentially the same as vine ripe tomatoes; and, at the point of sale to the end-use customer, all fresh tomatoes are ripe and can be sliced or cut up for use in salads, sandwiches, or salsas or as an ingredient in various recipes. Domestic producers consider a tomato that shows any redness at the time it is picked to be a vine ripe tomato.

Mature green tomato production is concentrated in Florida and the California Central Valley, while vine ripe tomato production is concentrated in southern California. The majority of Florida-grown fresh tomatoes are open field-grown mature green common round (including beefsteak) tomatoes. Production in most other states is of vine ripe common round (including beefsteak), plum/Roma, and cherry tomatoes grown in protected agriculture environments, particularly greenhouses. Mature green tomato production cannot be easily transformed into vine ripe tomato production because the varieties are bred specifically to be picked green, which usually results in poor field ripening, especially in Florida's climate. Whether harvested as mature green or vine ripe, at the retail level tomatoes have the same general physical appearance. Due to the packers' greater ability to control the ripening process for mature green tomatoes, these may be a firmer product by the time they reach the ultimate customer than vine ripe tomatoes.

Vine-ripened tomatoes stay on the vine longer, which allows them to start to turn red, but makes them less able to withstand packing and shipping. Vine ripe tomatoes are preferred in retail channels but have limited demand in foodservice establishments.

Tomato grades and standards in the United States are established by the U.S. Department of Agriculture (USDA) Agricultural Marketing Service (AMS). Florida-grown fresh-market tomatoes are covered under Federal Marketing Order 966, which establishes the quality, condition, and size requirements for Florida fresh-market tomatoes and fresh tomatoes

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protection. Food crops grown outdoors or covered temporarily were not included. USDA, NASS, 2024 *Census of Horticultural Specialties*, https://www.nass.usda.gov/Publications/AgCensus/2022/Online_Resources/Census_of_Horticulture_Specialties/HORTIC.pdf, February 2026, p. B-4.

⁵⁹ Furthermore, between 2019 and 2024, the square footage of tomatoes grown under protection in the United States fell by 3.0 percent. USDA, NASS, "Quickstats," <https://quickstats.nass.usda.gov/>, accessed April 23, 2026.

imported from October 10 through June 15.⁶⁰ Fresh tomatoes vary in grades and sizes from season to season and from week to week, and also vary in color, including red, orange, yellow, pink, or a combination or shade of these.

Since the early 2000s, the diversity of tomato varieties grown in protected agriculture environments in the United States, particularly in greenhouses, has increased due to changing consumer preferences for the characteristics these tomatoes offer.⁶¹ In addition to beefsteak and cluster (also called tomatoes on-the-vine or TOVs) varieties, a wide array of heirloom, grape, and small cocktail varieties are now grown in greenhouses. Typically, open field-grown tomatoes of the beefsteak variety have a thicker skin and are firmer products than the greenhouse-grown varieties of beefsteaks, although this is reportedly changing as greenhouse varieties are being developed to become more firm.

As of 2022, tomatoes are the second most consumed vegetable in the United States, accounting for more than 20 percent of the total vegetable per capita availability in the country.⁶² In 2024, U.S. per capita availability was 19.1 pounds of fresh tomatoes, an 9.8 percent increase from 17.4 pounds in 1996.⁶³ Corresponding with an increase in U.S. per capita consumption of tomatoes, there has also been an underlying shift in where tomatoes are being consumed; for example, the share of tomatoes consumed at home in the United States decreased from an average 66.7 percent in 1994–98 to 62.4 percent in 2007–08, while the share of tomatoes consumed away from home increased from 33.3 percent to 37.7 percent.⁶⁴ The USDA, Economic Research Service (ERS) estimates that around 75 percent of total U.S. tomato per capita availability is in the form of canned tomatoes as of 2022.⁶⁵

⁶⁰ Under the Federal Marketing Order (7 CFR 966), pear-shaped, cherry, hydroponic, and greenhouse tomatoes; tomatoes used in noncommercial outlets for experimental purposes; and tomatoes imported in quantities not exceeding 60 pounds are excluded from meeting these standards.

⁶¹ Tomatoes on the vine are harvested with the calyx and stem still attached to the tomatoes, which range in maturity stage.

⁶² USDA, ERS, “Food Availability (Per Capita) Data System: Vegetables (all uses),” <https://www.ers.usda.gov/media/5366/vegetables-all-uses.xlsx?v=21847>, retrieved April 23, 2026.

⁶³ USDA, ERS, “Vegetables and Pulses Yearbook Tables,” <https://www.ers.usda.gov/media/5017/vegetables-and-pulses-yearbook-tables.xlsx?v=31438>, retrieved April 23, 2026.

⁶⁴ The most recent calculations done by the paper to determine shares of food consumed at home and food consumed away from home stop with 2007–08. Anekwe et al., *U.S. Food Commodity Availability by Food Source, 1994–2008*, <https://www.ers.usda.gov/publications/pub-details?pubid=81817>, December 28, 2016, p. 11.

⁶⁵ Per capita availability of fresh and processed tomatoes was measured in the fresh-weight equivalent, where the weight of processed vegetables is converted to an equivalent weight of the fresh produce used. USDA, ERS, “Food Availability (Per Capita) Data System – Glossary,”

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More than half of the total U.S. open field-grown tomato production is reportedly destined for the foodservice sector.⁶⁶ However, an increasing number of foodservice establishments are demanding “fresh-cut processing tomatoes,” that is, fresh- market tomatoes that have been sliced or diced before arriving at the establishment, instead of processed tomatoes. Historically, this sector has preferred mature green open field-grown tomatoes because these are firmer than greenhouse-grown tomatoes. In addition to improving the firmness of the product through seed breeding, the greenhouse tomato industry has gained market share in the foodservice sector due to an increased consumer demand for “snacking” tomatoes, or tomatoes eaten out of hand, that are also used in the preparation of salads and other meals. Although snacking tomatoes used to be mostly of the grape variety, the industry has evolved to include more types of small tomatoes, which are increasingly grown in greenhouses.

Supermarkets stock many varieties of fresh tomatoes, including common round (including beefsteak), plum/Roma, grape, and cherry tomatoes, grown in open fields or in protected agriculture environments.

In 2024, about 85.4 percent of the tomatoes grown in Mexico were of the plum/Roma variety, 63 percent of which is grown in a protected agriculture environment, followed by the common round (including beefsteak) variety, which accounted for 10.3 percent of Mexican tomato production, 80 percent of which is grown in a protected environment.⁶⁷ The majority of U.S. imports of fresh tomatoes from Mexico in 2024 were of the plum/Roma variety, amounting to more than 1,019,000 metric tons, followed by about 362,000 metric tons of common round tomatoes.⁶⁸ As of 2017, Mexican consumption of tomatoes accounted for 54.2 percent of total domestic production.

Most Florida greenhouse tomatoes are marketed on the vine (TOVs) with stems attached “to convey the appearance of freshness to consumers.” This practice has gained

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<https://www.ers.usda.gov/data-products/food-availability-per-capita-data-system/glossary#freshweight>, retrieved April 23, 2026; “Food Availability (Per Capita) Data System: Vegetables (all uses),” <https://www.ers.usda.gov/media/5366/vegetables-all-uses.xlsx?v=21847>, retrieved April 23, 2026.

⁶⁶ Epp, “Processed tomatoes a market mainstay,” <https://produceprocessing.net/article/processed-tomatoes-market-mainstay/>, retrieved April 23, 2026.

⁶⁷ Servicio de Información Agroalimentaria y Pesquera, “Anuario Estadístico de la Producción Agrícola,” https://nube.agricultura.gob.mx/cierre_agricola/, retrieved April 23, 2026.

⁶⁸ USITC DataWeb/Census, HTS statistical reporting numbers 0702.00.2004, 0702.00.2006, 0702.00.2032, 0702.00.2036, 0702.00.2044, 0702.00.2048, 0702.00.2066, 0702.00.2081, 0702.00.4004, 0702.00.4006, 0702.00.4023, 0702.00.4027, 0702.00.4066, 0702.00.4081, 0702.00.6004, 0702.00.6006, 0702.00.6023, 0702.00.6027, 0702.00.6034, 0702.00.6037, 0702.00.6066, 0702.00.6081, <https://dataweb.usitc.gov/>, retrieved April 23, 2026.

popularity since the late 1990s, when producers began to grow cluster types instead of the beefsteak tomato variety. Many of these TOV varieties grown in protected agriculture environments have developed flavor profiles and appearances that allow them to compete with the open field-grown tomatoes. Additionally, increased demand for year-round, direct-to-consumer tomato sales has led to an increase in production of other types of tomatoes, such as grape and cocktail, in greenhouses.

Tomato growing and harvesting

Tomato production in the United States is similar in many ways to that in Mexico. The commercial production of fresh tomatoes involves planting, irrigation, fertilization, harvesting, cleaning, sorting, grading, and packing. Tomatoes can be grown in open fields, protected agriculture environments, or controlled-environment hydroponics. Protected agriculture includes a wide category of production methods that protect the plants from weather events and pests that might cause damage to the crops. These production methods range from low-technology tunnels covering the plants to medium-technology shade houses (walk-in structures with a mesh or plastic cover) to high-technology greenhouses (hothouses) that use technologies for controlling the environment inside the structure.⁶⁹

Tomatoes are considered warm-season crops although they are perennial plants and are sensitive to frost at any growth stage. Field planting in temperate climates occurs after the threat of frost has passed in the spring, or transplants can be planted and grown under row covers in late spring. Open field growers in the principal U.S. and Mexican production areas have shifted to the use of transplants rather than seeds due to high seed costs, among other factors. Production practices include transplanting plants into plastic mulch on raised beds—which warm up more quickly in the spring, enhance earlier growth, and facilitate drainage, which prevents waterlogging—as well as the use of underground drip irrigation systems. All open field-grown tomatoes are subject to weather conditions prevalent throughout the growing and harvest season. Once transplants are set in the fields, growers have little control over any unfavorable environmental conditions. In the major producing states, growers also use land leveler planes to grade their fields and dig wells adjacent to their fields for water.

In the United States, the use of degreening rooms to hasten the ripening of mature green tomatoes is prevalent in the industry. While vine ripe tomatoes complete the ripening process naturally, mature green tomatoes are picked at an earlier stage of development—while

⁶⁹ Hydroponic production relies on growing plants in a soil-less growing medium watered with a nutrient solution, typically in a fully enclosed, permanent structure designed to materially control the growing environment.

still green—and must be degreened before or after shipment. There is virtually no difference in fertilization or irrigation requirements for green and vine-ripened tomatoes except that irrigation for mature green tomatoes ends several days before harvest because they must be somewhat dehydrated for the degreening process. The degreening process, unique to mature green tomatoes, involves the application of ethylene gas to cause ripening under controlled conditions. Ethylene is a natural, odorless, tasteless gas emitted by tomatoes and many other types of produce, which accelerates the ripening process. Although mature green tomato producers in Florida and California use this process to ripen tomatoes, according to industry sources, Mexican growers rarely use this method anymore.

Fresh market tomatoes are also commercially grown using organic production practices. The USDA National Organic Program (NOP) establishes the standards and requirements for certified organic products in the United States.⁷⁰ For a food product to be labeled organic, synthetic fertilizers, sewage sludge, irradiation, and genetic engineering may not be used in the production process. Growers producing and selling tomatoes with an organic label must be certified by a USDA-approved certifying agency and must follow production standards regulated by the NOP. Certified organic products entering the United States must be certified by international organizations authorized by the USDA or conform to authorized international standards. Organically grown tomatoes are popular among consumers seeking organic vegetables for health or ideological reasons, as well as produce consumers seeking unique varieties and flavors. Although open field and protected agriculture tomatoes can be organically grown, open field tomatoes account for the largest share of organic tomatoes produced in the United States.

Harvesting of open field-grown tomatoes in Florida begins in November and continues through the following May (winter season), with production in California principally available from June through November (summer season). Open field-grown tomatoes commercially produced in most other U.S. states are available primarily during June through October. Between May and July, production moves into states further up the East Coast and begins in California. From August to October, most other states report some commercial fresh tomato production. By November, most other states are out of production, and Florida is starting production again.

⁷⁰ The NOP defines the labeling term “organic” as an indication that “the food or other agricultural product has been produced through approved methods that integrate cultural, biological, and mechanical practices that foster cycling of resources, promote ecological balance, and conserve biodiversity.”

Mexico exports tomatoes to the United States throughout the year, but its peak shipping season is from January through April from Sinaloa and Sonora, which primarily overlaps with the Florida harvest season. Production in Mexico is centered in Sinaloa during January through May, when it shifts to Sonora and then to Baja California during July and October, although other regions in Mexico also produce tomatoes. Sinaloa—the largest tomato-producing state in Mexico—only produces winter season tomatoes, about 78 percent of which were harvested between January and April as of 2017; additionally, 73 percent of the crop in Sonora—the eighth-largest tomato producing state in Mexico—is for the winter season. However, despite the emphasis on the winter growing season, Mexico’s use of protected growing environments, such as greenhouses, have increasingly enabled Mexican producers to extend their production and marketing windows beyond the winter growing season. In 2024, the share of Mexico’s production achieved using protected environments was 65.6 percent, an increase from 63.3 percent in 2017.⁷¹ Sinaloa, however, saw a different trend in production using protected environments; between 2017 and 2024, the share of Sinaloa’s tomato production done using protected environments fell from 51.9 percent in 2017 to 44.1 percent in 2024.⁷²

All fresh tomatoes grown in the United States or Mexico are hand-picked. Harvesting is done frequently in open field cultivation to avoid overripe fruit. Open field-grown tomato producers in both countries rely on a larger proportion of seasonal migrant workers. Once harvested, all fresh tomatoes are washed, sorted, graded, and packed. All tomatoes are generally kept in controlled temperatures and humidity during storage and shipment. Fresh tomatoes are very perishable and are marketed as soon after packing as possible.

Tomatoes are grown in protected agriculture environments to protect plants from the weather. In temperate climates, tomatoes are grown in protected environments such as greenhouses primarily to extend the production season. In contrast, in warm climates, protected agriculture environments such as shade houses are used to protect the plants from

⁷¹ Between 2017 and 2024, production of fresh tomatoes in protected environments in Mexico increased by 11.2 percent by quantity, while the acres harvested increased by 8.1 percent. Similarly, between 2019 and 2024, production of tomatoes in protected environments in Mexico increased by 5.0 percent by quantity and the acres harvested increased by 0.9 percent. Servicio de Información Agroalimentaria y Pesquera, “Anuario Estadístico de la Producción Agrícola,” https://nube.agricultura.gob.mx/cierre_agricola/, retrieved April 29, 2026.

⁷² Note that from 2017 to 2024, Sinaloa’s total production of tomatoes decreased by 14.7 percent from 937,796 metric tons to 800,116 metric tons, while production of tomatoes in protected environments fell by 27.5 percent from 486,571 metric tons to 352,824 metric tons. Servicio de Información Agroalimentaria y Pesquera, “Anuario Estadístico de la Producción Agrícola,” https://nube.agricultura.gob.mx/cierre_agricola/, retrieved April 29, 2026.

excessive heat and other weather extremes. The production process for greenhouse tomatoes is slightly different from that of open field tomatoes. Greenhouse production, particularly in high-technology greenhouses, is more expensive than open field production due to high investment costs, which vary depending on the level of technology used. Consequently, although the rapid increase in greenhouse tomato production has reduced the price differential between greenhouse and open field, tomatoes produced in high-tech greenhouses are still higher priced than open field tomatoes. Greenhouse tomatoes can be grown hydroponically or in soil. While the basic production process is similar to open field tomato production, after planting, greenhouse tomatoes require continuous pruning and training to a trellis system. Advantages of greenhouse production include uniform appearance and quality, consistency in production, increased yields per acre, and enhanced grower capability to sustain year-round production. Additionally, greenhouse production has benefits in terms of pest control and reduced risk exposure to climate change.

While greenhouses could produce tomatoes year-round, high heating costs in the northern winter and high cooling costs in the southern summer make that impractical. Therefore, greenhouses follow production patterns similar to open field tomato production. Employees in U.S. greenhouse tomato operations are primarily full-time and employed all year long. According to a 2013 paper, more than 40 percent of the tomatoes produced in the United States for the retail market are greenhouse-grown.⁷³

⁷³ Asci et al., “The Potential for Greenhouse Tomato Production Expansion in Florida,” <https://ageconsearch.umn.edu/bitstream/143095/2/SAEA-2013->, April 1, 2017, p. 3

Domestic like product issues

In their comments on draft questionnaires, Mastronardi Produce and Nature Sweet requested the Commission collect specific data on greenhouse grown specialty tomatoes as a separate like product.^{74 75} The Commission did not collect separate like product information regarding specialty tomatoes in its current questionnaires, consistent with its approach in the final phase investigation in 2019, as it did not institute this changed circumstances review on the basis of any like product-related considerations.⁷⁶

The Florida Tomato Exchange argues that the Commission should find a single like product of all fresh tomatoes, as it did in its final phase investigation (2019) and previous reviews of the suspended investigation.⁷⁷ Mexican producers and exporters do not contest the Commission's prior decisions that there is a single domestic like product of all fresh tomatoes.⁷⁸ In its prehearing and posthearing briefs, Mastronardi Produce⁷⁹ and Nature Sweet⁸⁰ provided further comment on a separate like product for greenhouse grown specialty tomatoes. Mastronardi and Nature Sweet argue that the Commission should find two separate like products: "specialty" variety tomatoes, such as grape, cherry, and cocktail tomatoes, normally grown in a greenhouse, and standard or commodity tomatoes, such as round and plum/Roma tomatoes.^{81 82}

⁷⁴ Mastronardi Produce's comments on draft questionnaires, February 9, 2026, p. 4.

⁷⁵ Nature Sweet's comments on draft questionnaires, February 9, 2026, p. 5.

⁷⁶ In the final phase investigation, Nature Sweet argued for a separate like product for greenhouse grown specialty tomatoes. The Commission did not collect separate like product information on greenhouse grown specialty tomatoes in the final phase investigation in 2019.

⁷⁷ Florida Tomato Exchange's prehearing brief, p. 23.

⁷⁸ Hearing transcript, pp. 69-70 (Winton).

⁷⁹ Mastronardi's prehearing brief, p. 7.

⁸⁰ Nature Sweet's prehearing brief, p. 30.

⁸¹ Nature Sweet posthearing brief, p. 25.

⁸² Mastronardi's posthearing brief, p. 11.

U.S. market participants

U.S. producers

During the original investigation, eight growers and 30 packers supplied the Commission with information on their U.S. operations with respect to fresh tomatoes. These firms accounted for an estimated *** percent of U.S. production of fresh tomatoes in 2001.⁸³ In the fourth five-year full review of the suspended investigation, 17 firms provided the Commission with information on their fresh tomato operations. These firms were believed to account for *** percent of U.S. production of fresh tomatoes in 2017.⁸⁴ In its resumed final-phase investigation, the Commission issued a U.S. producer questionnaire to 816 firms based on information contained in the fourth review. Twenty-three firms provided usable data on their production operations.⁸⁵ These firms' responses were believed to represent approximately 56.1 percent of overall U.S. production of fresh tomatoes in 2018. Six of the 23 responding producers reported greenhouse and controlled-environment production. In its fifth five-year review of the suspended investigation, the Commission issued U.S. producers' questionnaires to more than 60 firms, 12 of which provided the Commission with information on their production operations. These firms' responses were believed to account for the majority of U.S. production of fresh tomatoes in 2024.

In this current proceeding, the Commission issued U.S. producers' questionnaires to 426 firms, and a small number of responding producers provided the Commission with information on their production operations. These firms are believed to account for the majority of U.S. production of fresh tomatoes in 2025.⁸⁶ Seven producers reported greenhouse and controlled-environment production. Presented in table 1.7 is a list of current domestic producers of

⁸³ *Fresh Tomatoes from Mexico*, INV-Z-194 (December 3, 2002), p. III-1.

⁸⁴ This estimate is based on information available from USDA fresh tomato production for the United States for 2017 (2.845 billion pounds), compared to reported 2017 U.S. producer net sales (1.218 billion pounds) at table III-16. *2018 Vegetables and Pulses Yearbook*, USDA, Economic Research Service, Table 42.

⁸⁵ This estimate is based on USDA's reported value for total U.S. "greenhouse" production in 2017 (\$419 million), compared with responding U.S. producer's reported value of total reported greenhouse and controlled-environment shipments for 2017 (\$194.4 million). USDA's *2017 Census of Agriculture – State Data*, table 34. USDA defined "greenhouse" as comprising "establishments primarily engaged in growing crops of any kind under cover..." 'Under cover' is generally defined as greenhouses, cold frames, cloth houses, and lath houses." *Ibid.*, App. A.

⁸⁶ U.S. producer ***.

product and each company's position on continuation of the orders, production locations, and share of reported production of fresh tomatoes in 2025.

Table 1.7 Fresh tomatoes: U.S. producers, positions on orders, U.S. production locations, and shares of reported U.S. production, 2025

Share in percent

Firm	Position on continuation of the order	Production location(s)	Share of production
DiMare Enterprises	***	Newman, CA; Indio, CA; Coachella, CA San Joaquin Valley, CA; Central Coast, CA	***
DiMare Homestead	***	Homestead, FL; Myakka City, FL; Apollo Beach, FL; Florida City, FL	***
Gargiulo	***	Immokalee, FL; Quincy, FL; Firebaugh, CA; Myakka, FL	***
Leitz Farms	***	Sodus, Michigan	***
Lipman Family Farms	***	LaBelle, FL; Estero, FL; Naples, FL; Wimamuma, FL; Manteca, CA; Exmore, VA; St. Helena, SC; Lake Worth, FL; Unicoi, TN; Morristown, TN	***
Mastronardi Produce	***	Madison, ME; Oneida, NY; Coldwater, MI; Coldwater, MI; Morehead, KY; Richmond, KY; Wapakoneta, OH; Mona, UT; Albion, NY; Ontario, NY	***
NatureSweet USA	***	Willcox, AZ	***
Pacific Tomato Growers	***	Imokalee, FL; Parrish, FL; Bainbridge, GA; Palmetto, FL; Wilmauma, FL; Midway, TN; Newport, TN	***
Pure Flavor	***	Fort Valley, GA; Rochelle, IL	***
Red Sun Farms	***	Dublin, VA	***
Smith Tomato	***	Steele, AL	***
TLC Farms	***	Suttons Bay, MI	***
Viereck Farms	***	Woolwich Township, NJ	***
West Coast Tomato	***	Palmetto, FL; Manatee County, FL; Hendry County, FL	***
West Coast Tomato Growers	***	Oceanside, CA	***
Windset Farms	***	Santa Maria, CA	***
All firms	Various	Various	100.0

Source: Compiled from data submitted in response to Commission questionnaires.

As indicated in table 1.8, six U.S. producers are related to foreign producers of the subject merchandise and eight are related to U.S. importers of the subject merchandise. In

addition, as discussed in greater detail in Part 3, four U.S. producers directly import the subject merchandise and one purchased the subject merchandise from U.S. importers.

Table 1.8 Fresh tomatoes: U.S. producers' ownership, related and/or affiliated firms

Reporting firm	Relationship type and related firm	Details of relationship
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***

Table continued

Table 1.8 Fresh tomatoes (continued): U.S. producers' ownership, related and/or affiliated firms

Reporting firm	Relationship type and related firm	Details of relationship
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***

Table continued

Table 1.8 Fresh tomatoes (continued): U.S. producers' ownership, related and/or affiliated firms

Reporting firm	Relationship type and related firm	Details of relationship
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***

Source: Compiled from data submitted in response to Commission questionnaires.

Presented in tables 1.9, 1.10, 1.11, 1.12, 1.13, and 1.14 are counts of responding U.S. and foreign producers' responses regarding changes in related importers and producers (table 1.9), the count in firms responses regarding types of production facilities (hydroponic, protected, or other, table 1.10), types of production activities (growing, harvesting, and/or packing, table 1.11), specific features of hydroponic growing (table 1.12), specific features of protected growing environments (table 1.13), and specific features of open field growing (table 1.14).

Table 1.9 Fresh tomatoes: Count of firms' responses regarding changes in related importers or producers, by type of affiliation, firm type and period

Count in number of firms

Affiliation type	Firm type	2019 to 2025: No	2019 to 2025: Yes	Since July 2025: No	Since July 2025: Yes
Related importers/exporters: Mexico	U.S. producers	14	1	15	0
Related producers: Mexico	U.S. producers	13	2	15	0
Related producers: Other sources	U.S. producers	14	1	15	0
Related importers/exporters: Mexico	Foreign producers	189	22	190	22
Related producers: United States	Foreign producers	208	3	208	2
Related producers: Other sources	Foreign producers	208	0	207	2

Source: Compiled from data submitted in response to Commission questionnaires

Table 1.10 Fresh tomatoes: Count of firms' responses regarding types of production facilities, by firm type and growing method type

Count in number of firms

Firm type	Hydroponic	Protected	Open
U.S. producers	6	1	8
Foreign producers	63	124	55

Source: Compiled from data submitted in response to Commission questionnaires.

Table 1.11 Fresh tomatoes: Count of firms' responses regarding types of production activities, by firm type

Count in number of firms

Firm type	Growing	Harvesting	Packing
U.S. producers	16	16	16
Foreign producers	183	178	181

Source: Compiled from data submitted in response to Commission questionnaires.

Table 1.12 Fresh tomatoes: Count of producers' indicating specific features of hydroponic growing environments

Count in number of firms

Environment	U.S. producers	Foreign producers
Hydroponics	7	76
Cooling or air conditioned facilities	5	23
Heating facilities	7	46
Climate Control	7	54
Automated irrigation	7	81
Other	0	7
Controlled environment hydroponic items	7	87

Source: Compiled from data submitted in response to Commission questionnaires.

Table 1.13 Fresh tomatoes: Count of producers' indicating specific features of protected growing environments

Count in number of firms

Environment	U.S. producers	Foreign producers
Fully enclosed structure	2	74
Steel structure	2	67
Aluminum structure	0	24
Glass	1	4
Impermeable plastic	1	52
Polycarbonate	0	5
Tunnel	1	19
Shade house	0	74
Netting	0	22
Plastic	1	56
Glass	0	1
Other	0	3
Protected culture item	3	137

Source: Compiled from data submitted in response to Commission questionnaires.

Table 1.14 Fresh tomatoes: Count of producers' indicating specific features of open field growing environments

Count in number of firms

Environment	U.S. producers	Foreign producers
Open field	9	46
Temporary shading	1	4
Temporary row cover	1	5
Other	0	1
Open field items	9	49

Source: Compiled from data submitted in response to Commission questionnaires.

U.S. importers

In the first final phase of the original investigation, 31 U.S. importing firms supplied the Commission with usable information on their operations involving the importation of fresh tomatoes, accounting for approximately half of U.S. imports of fresh tomatoes during 2001.⁸⁷

In its fourth full five-year review of the suspended investigation, the Commission issued questionnaires to 548 firms believed to import fresh tomatoes. Twenty-nine firms provided data and information in response to the questionnaires, while an additional 29 firms indicated that they had not imported fresh tomatoes. Based on official Commerce statistics for imports of fresh tomatoes, these importers' questionnaire data accounted 35.4 percent of subject imports and 3.1 percent of imports from nonsubject sources during 2017 under HTS subheading 0702.00.

In its final-phase investigation, the Commission issued importer questionnaires to 442 firms believed to be importers of fresh tomatoes, as well as to all U.S. producers of fresh tomatoes.⁸⁸ Usable questionnaire responses were received from 52 companies, representing 52.1 percent of U.S. imports from Mexico and 7.5 percent of U.S. imports from nonsubject sources in 2018 under HTS subheading 0702.00.

In its fifth full five-year review of the suspended investigation, the Commission issued U.S. importers' questionnaires to more than 60 firms, received useable questionnaire responses from 90 companies, representing the majority of U.S. imports from Mexico in 2024 under HTS subheading 0702.00.

In the current proceedings, the Commission issued U.S. importers' questionnaires to 100 firms believed to be importers of fresh tomatoes, as well as to all U.S. producers of fresh tomatoes. Usable questionnaire responses were received from 82 firms, representing 77.6 percent of U.S. imports from Mexico. Table 1.15 lists all responding U.S. importers of fresh tomatoes from Mexico and other sources, their locations, and their shares of U.S. imports in 2025.

⁸⁷ *Fresh Tomatoes from Mexico, Investigation No. 731-TA-747 (Final)*, INV-Z-194, December 3, 2002, p. IV-1.

⁸⁸ The Commission issued questionnaires to those firms identified in the petition, along with firms that, based on a review of data provided by U.S. Customs and Border Protection ("Customs"), may have accounted for more than one percent of total imports under HTS subheading 0702.00 in 2018.

Table 1.15 Fresh tomatoes: U.S. importers, their headquarters, and share of imports within each source, 2025

Share in percent

Firm	Head-quarters	Mexico	Canada	All other sources	Non-subject sources	All import sources
Ag-Mart	Plant City, FL	***	***	***	***	***
Agricola Pantoni	Queretaro, MX	***	***	***	***	***
Agricola Santo Domingo	San Francisco Del Rincon, GU	***	***	***	***	***
Agrileg De Tehuacan	Tepanco De Lopez, PU	***	***	***	***	***
Agrizom	Ciudad Fernandez, 24	***	***	***	***	***
Agro-Fresh USA	Mcallen, TX	***	***	***	***	***
Agroindustria Del Portezuelo	Acámbaro, GU	***	***	***	***	***
Agroinvernaderos San Antonio	Villagran, GT	***	***	***	***	***
Arogon Produce	Jaral Del Progreso, GT	***	***	***	***	***
Bellflower	Pharr, TX	***	***	***	***	***
Bio-Organicos Saludables	Actopan, Hidalgo	***	***	***	***	***
Biotech de Salvatierra	Tarimoro Guanajuato, GT	***	***	***	***	***
BJ Brothers	Rio Rico, AZ	***	***	***	***	***
Bresca Hortalizas	Atlixco, MX	***	***	***	***	***
Centro de Produccion Santa Rita	Rioverde, MX	***	***	***	***	***
Chucho Produce	Nogales, AZ	***	***	***	***	***
Coast Citrus Distributors	San Diego, CA	***	***	***	***	***
Comercializadora Gab	Cortazar, GT	***	***	***	***	***

Table continued

Table 1.15 Fresh tomatoes (continued): U.S. importers, their headquarters, and share of imports within each source, 2025

Share in percent

Firm	Head-quarters	Mexico	Canada	All other sources	Non-subject sources	All import sources
Controladora Santa Ana	Matamoros Pue, MX	***	***	***	***	***
Crisp Greenhouses	Culiacan, SI	***	***	***	***	***
DCO Produce	Coronado, CA	***	***	***	***	***
Del Campo Supreme	Nogales, AZ	***	***	***	***	***
Delta Fresh	Nogales, AZ	***	***	***	***	***
Desarrolladora y Promotora Agropecuaria	Jocotitlan, MX	***	***	***	***	***
Divine Flavor	Nogales, AZ	***	***	***	***	***
Doozland	Mcallen, TX	***	***	***	***	***
Eagle Eye	Rio Rico, AZ	***	***	***	***	***
El Dorado Growers	Mcallen, TX	***	***	***	***	***
Expo Fresh	San Diego, CA	***	***	***	***	***
Farmer's Best	Rio Rico, AZ	***	***	***	***	***

Table continued

Table 1.15 Fresh tomatoes (continued): U.S. importers, their headquarters, and share of imports within each source, 2025

Share in percent

Firm	Headquarters	Mexico	Canada	All other sources	Non-subject sources	All import sources
Finca Ahuehuetes	Colon,	***	***	***	***	***
Frello Fresh	Rio Rico, AZ	***	***	***	***	***
Fresh Vegetables Dist	Pharr, TX	***	***	***	***	***
Frutos De Huerta Real	Puebla,	***	***	***	***	***
Gab Operations	Laredo, TX	***	***	***	***	***
GCL 39	Pharr, TX	***	***	***	***	***
Globalmex International	Mission, TX	***	***	***	***	***
GoodFarms	San Diego, CA	***	***	***	***	***
Grower Alliance	Rio Rico, AZ	***	***	***	***	***
Happy Produce	San Diego, CA	***	***	***	***	***
Hidrosel Produce	Atlixco, Puebla, PU	***	***	***	***	***
HM Produce	Pharr, TX	***	***	***	***	***
Hortisen De Atlixco	Atlixco, PU	***	***	***	***	***
iDeal HarBest	Nogales, AZ	***	***	***	***	***
IHB	Houston, TX	***	***	***	***	***
Invernaderos El Fortin	Mexico City, MX	***	***	***	***	***
Invernaderos Mesa Grande and Ejido	Calvillo / Rincon De Romos, AG	***	***	***	***	***
Jacobs Farm Del Cabo	Pescadero, CA	***	***	***	***	***
JD Agro Kapital	Ciudad De Mexico,	***	***	***	***	***
Jem D	Kingsville, Canada, ON	***	***	***	***	***
Kaliroy Fresh	Nogales, AZ	***	***	***	***	***
Kingdom Fresh	Donna, TX	***	***	***	***	***
Las Tablas	Rincon De Romos, AG	***	***	***	***	***
Little Farm Frozen	Brownsville, TX	***	***	***	***	***
Malena Produce	Nogales, AZ	***	***	***	***	***
Marengo Foods	San Juan, TX	***	***	***	***	***
Masterstouch	San Diego, CA	***	***	***	***	***
Mastronardi	Kingsville, ON	***	***	***	***	***
Natura	Querèaro, QR	***	***	***	***	***
NS Brands	San Antonio, TX	***	***	***	***	***

Table continued

Table 1.15 Fresh tomatoes (continued): U.S. importers, their headquarters, and share of imports within each source, 2025

Share in percent

Firm	Headquarters	Mexico	Canada	All other sources	Nonsubject sources	All import sources
Pacific Heartland	Palmetto, FL	***	***	***	***	***
Pinos Produce	San Diego, CA	***	***	***	***	***
Produce House	Nogales,, AZ	***	***	***	***	***
Produce Team	San Antonio, TX	***	***	***	***	***
Pure Flavor	Leamington, ON	***	***	***	***	***
Rancho Acucola Elixir	Tepanco De Lopez, PU	***	***	***	***	***
Rio Vista	Rio Rico, AZ	***	***	***	***	***
Sierra Pack	Acambaro, GT	***	***	***	***	***
Sofia Produce	Rio Rico, Az, AZ	***	***	***	***	***
Solar Garden	Querétaro,	***	***	***	***	***
Sun and Sands	La Quinta, CA	***	***	***	***	***
Sunny Fields	Ajuchitlan, QR	***	***	***	***	***
Sunrise Produce	Mcallen, TX	***	***	***	***	***
Talayote	Austin, TX	***	***	***	***	***
Tepeyac Produce	Rio Rico, AZ	***	***	***	***	***
Veggie Prime	Colón, QU	***	***	***	***	***
Vo Produce	Nogales, AZ	***	***	***	***	***
Western Repacking	Immokalee, FL	***	***	***	***	***
Wholesum Family	Amado, AZ	***	***	***	***	***
Windset Farms	Santa Maria, CA	***	***	***	***	***
Additional firms (see note)	Various	***	***	***	***	***
All firms	Various	100.0	100.0	100.0	100.0	100.0

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "—". Since the pre-hearing report, additional U.S. importers submitted completed questionnaire responses (***), neither of which reported any imports after 2024.

U.S. purchasers

In its preliminary phase investigation, the Commission issued inquiries to at least 50 firms with information regarding lost sales and/or lost revenues related to LTFV imports of tomatoes from Mexico. It received responses from more than 40 firms that bought fresh tomatoes from Mexico from 1991 through 1995.

In its fourth full five-year review of the suspended investigation, the Commission issued U.S. purchaser questionnaires to more than 50 firms, and received useable questionnaire responses from 18 firms that bought fresh tomatoes from January 1, 2015, to September 30, 2018.

In its final phase investigation, the Commission issued U.S. purchaser questionnaires to more than 50 firms, it received useable questionnaire responses from 22 firms that bought fresh tomatoes during January 1, 2016 to June 30, 2019.

In its fifth full five-year review of the suspended investigation, the Commission issued U.S. purchaser questionnaires to more than 60 firms, and received useable questionnaire responses from 17 usable questionnaire responses from firms that bought fresh tomatoes during 2019 to 2025.

In this current changed circumstances review, the Commission issued U.S. purchaser questionnaires to more than 50 firms, and received 25 usable questionnaire responses from firms that bought fresh tomatoes during 2019 to 2025. The majority of the responding purchasers are distributors, while fresh tomatoes mainly sold to packers and distributors. The responding purchasers represented firms in a variety of domestic industries, including grocery chains and distributors. Large purchasers of fresh tomatoes include ***.

Apparent U.S. consumption and market shares

Quantity

Table 1.16 presents data on apparent U.S. consumption and U.S. market shares by quantity for fresh tomatoes. Apparent U.S. consumption based on quantity for U.S. producers was higher in 2025 than in 2019 (based on questionnaire data), while the share for U.S. producers was slightly lower in 2025 than in 2019, based on quantity (questionnaire data). Subject imports were slightly higher in 2025 than in 2019, and subject imports' market share was also slightly higher in 2025 than in 2019. Nonsubject imports from Canada were slightly higher in 2025 than in 2019, and nonsubject imports' market share was also slightly higher in 2025 than in 2019.

Table 1.16 Fresh tomatoes: Apparent U.S. consumption and market shares based on quantity, by source and period

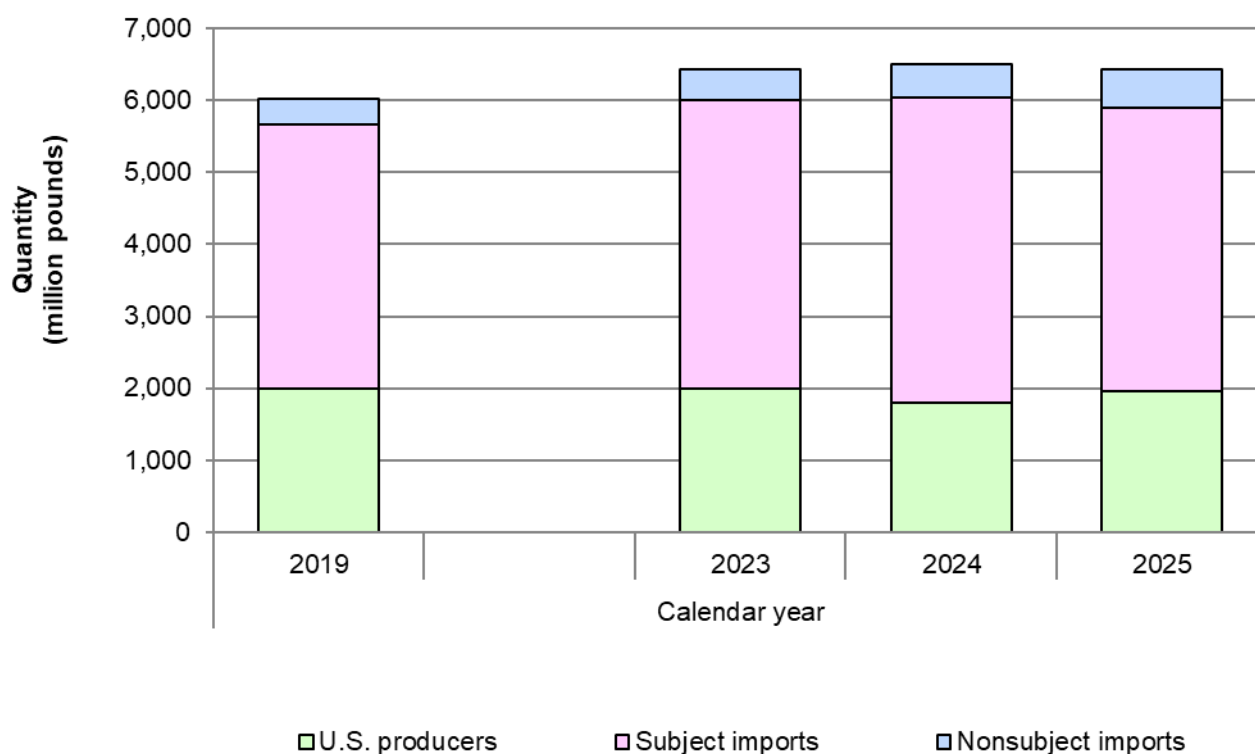
Quantity in pounds; shares in percent

Source	Measure	2019	2023	2024	2025	2019-2025 Change
U.S. producers: Questionnaire data	Quantity	1,200,300	1,199,214	1,224,312	1,326,760	▲ 10.5
U.S. producers: Additional USDA based data	Quantity	802,350	792,702	574,794	622,891	▼ (22.4)
U.S. producers: All U.S. shipments	Quantity	2,002,649	1,991,917	1,799,105	1,949,651	▼ (2.6)
Mexico	Quantity	3,661,788	4,015,226	4,235,705	3,953,320	▲ 8.0
Canada	Quantity	330,445	386,273	430,942	485,248	▲ 46.8
All other sources	Quantity	30,370	35,412	35,798	36,114	▲ 18.9
Nonsubject sources	Quantity	360,815	421,685	466,740	521,362	▲ 44.5
All import sources	Quantity	4,022,603	4,436,911	4,702,445	4,474,682	▲ 11.2
All sources	Quantity	6,025,253	6,428,828	6,501,550	6,424,333	▲ 6.6
U.S. producers: Questionnaire data	Share	19.9	18.7	18.8	20.7	▲ 0.7
U.S. producers: Additional USDA based data	Share	13.3	12.3	8.8	9.7	▼ (3.6)
U.S. producers: All U.S. shipments	Share	33.2	31.0	27.7	30.3	▼ (2.9)
Mexico	Share	60.8	62.5	65.1	61.5	▲ 0.8
Canada	Share	5.5	6.0	6.6	7.6	▲ 2.1
All other sources	Share	0.5	0.6	0.6	0.6	▲ 0.1
Nonsubject sources	Share	6.0	6.6	7.2	8.1	▲ 2.1
All import sources	Share	66.8	69.0	72.3	69.7	▲ 2.9
All sources	Share	100.0	100.0	100.0	100.0	—

Source: Compiled from data submitted in response to Commission questionnaires, USDA Vegetables and Pulses Yearbook, and official U.S. import statistics of the U.S. Department of Commerce using the HTS statistical reporting numbers listed for fresh tomatoes in footnote 2 of this report, accessed April 10, 2026. Imports are based on the imports for consumption data series.

Note: USDA production data less export shipments were used to calculate U.S. producers' U.S. shipments totals for 2019 through 2024. Due to data availability, 2025 U.S. producers' U.S. shipments were derived using the questionnaire data vs. USDA data experience in 2024 to adjust reported 2025 data. Additional USDA-based data are the difference between all U.S. shipments and questionnaire data for U.S. producers. Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "—".

Figure 1.1 Fresh tomatoes: Apparent U.S. consumption based on quantity, by source and period



Source: Compiled from data submitted in response to Commission questionnaires, USDA Vegetables and Pulses Yearbook, and official U.S. import statistics of the U.S. Department of Commerce using the HTS statistical reporting numbers listed for fresh tomatoes in footnote 2 of this report, accessed April 10, 2026. Imports are based on the imports for consumption data series.

Value

Table 1.17 and figure 1.2 present data on apparent U.S. consumption and U.S. market shares by value for fresh tomatoes. Apparent U.S. consumption based on value for U.S. producers was higher in 2025 than in 2019, while the share for U.S. producers was slightly lower during the same period, based on value. Subject imports were higher in 2025 than in 2019, while subject imports' market share was also lower in 2025 than in 2019. Nonsubject imports from Canada were higher in 2025 than in 2019, and nonsubject imports' market share was also higher in 2025 than in 2019.

Table 1.17 Fresh tomatoes: Apparent U.S. consumption and market shares based on value, by source and period

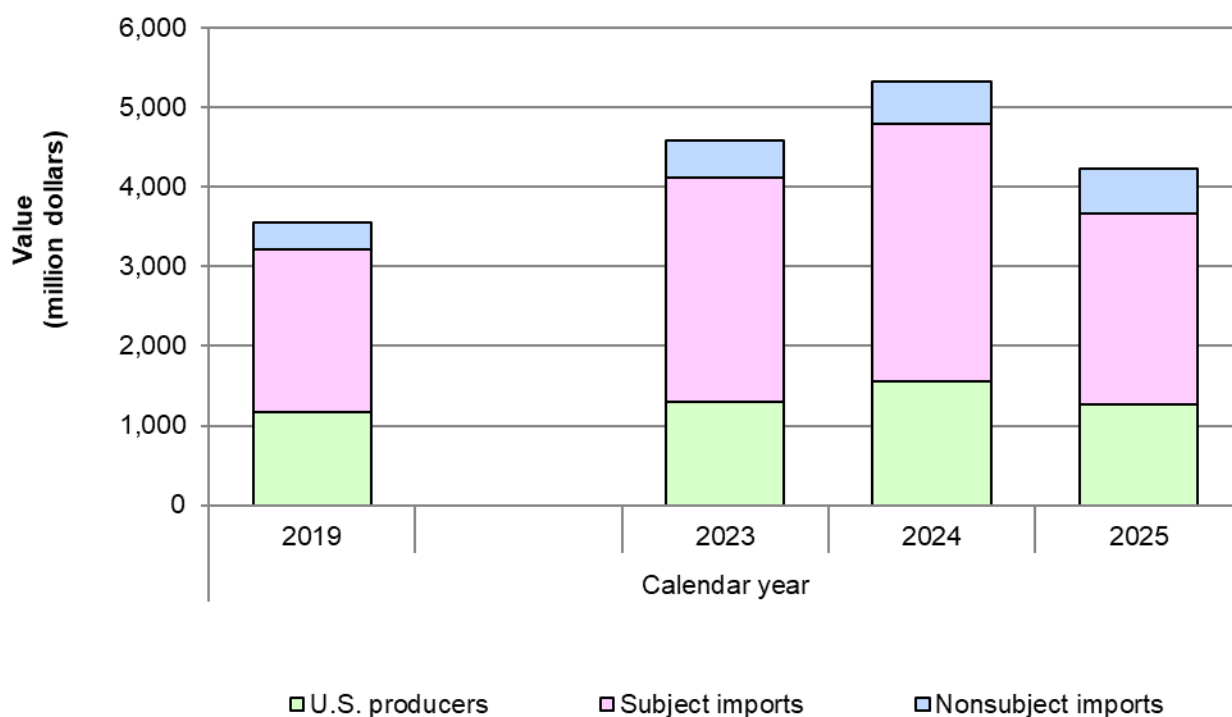
Value in 1,000 dollars; shares in percent

Source	Measure	2019	2023	2024	2025	2019-2025 Change
U.S. producers: Questionnaire data	Value	697,132	785,122	1,063,082	860,118	▲23.4
U.S. producers: Additional USDA based data	Value	466,003	518,980	499,099	403,811	▼(13.3)
U.S. producers: All U.S. shipments	Value	1,163,136	1,304,102	1,562,181	1,263,929	▲8.7
Mexico	Value	2,048,068	2,819,090	3,234,167	2,404,333	▲17.4
Canada	Value	308,284	410,740	475,860	517,840	▲68.0
All other sources	Value	34,247	47,168	49,297	47,087	▲37.5
Nonsubject sources	Value	342,531	457,908	525,158	564,927	▲64.9
All import sources	Value	2,390,599	3,276,997	3,759,324	2,969,260	▲24.2
All sources	Value	3,553,734	4,581,099	5,321,506	4,233,190	▲19.1
U.S. producers: Questionnaire data	Share	19.6	17.1	20.0	20.3	▲0.7
U.S. producers: Additional USDA based data	Share	13.1	11.3	9.4	9.5	▼(3.6)
U.S. producers: All U.S. shipments	Share	32.7	28.5	29.4	29.9	▼(2.9)
Mexico	Share	57.6	61.5	60.8	56.8	▼(0.8)
Canada	Share	8.7	9.0	8.9	12.2	▲3.6
All other sources	Share	1.0	1.0	0.9	1.1	▲0.1
Nonsubject sources	Share	9.6	10.0	9.9	13.3	▲3.7
All import sources	Share	67.3	71.5	70.6	70.1	▲2.9
All sources	Share	100.0	100.0	100.0	100.0	—

Source: Compiled from data submitted in response to Commission questionnaires, USDA Vegetables and Pulses Yearbook, and official U.S. import statistics of the U.S. Dept. of Commerce using the HTS statistical reporting numbers listed in footnote 2 of this report, accessed April 10, 2026. Imports are based on the imports for consumption data series. Imports value data reflect the landed duty-paid value.

Note: To report value data for USDA all U.S. shipments, the average unit value of U.S. producers' U.S. shipments from questionnaire responses were used to multiply against the total USDA U.S. shipments quantities from the quantity apparent U.S. consumption table. Additional USDA-based data are then just the difference between U.S. shipments and questionnaire data for U.S. producers. Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "—".

Figure 1.2 Fresh tomatoes: Apparent U.S. consumption based on value, by source and period



Source: Compiled from data submitted in response to Commission questionnaires, USDA Vegetables and Pulses Yearbook, and official U.S. import statistics of the U.S. Department of Commerce using the HTS statistical reporting numbers listed for fresh tomatoes in footnote 2 of this report, accessed April 10, 2026. Imports are based on the imports for consumption data series.

Part 2: Conditions of competition in the U.S. market

U.S. market characteristics

Fresh tomatoes are available in many varieties and can be produced using multiple different growing conditions ranging from open fields to weather-controlled greenhouses.¹ Types of fresh tomatoes include Roma (plum), round tomatoes, and grape tomatoes. The large majority of fresh tomatoes are red in color when ripe, but can be yellow, orange, pink, green, burgundy, purple, and streaked or striped when mature. Tomatoes are harvested as “mature greens” when they are green or light pink and de-greened with ethylene gas, or harvested as “vine ripe” when they have reached a color (e.g., red) that indicates they are ripe at the time of harvesting. Tomatoes harvested as “mature greens” have a longer shelf life and are less susceptible to damage during packing and shipping than tomatoes harvested “vine ripe.”²

As noted below, there is some seasonality for fresh tomato types, which may depend on growing conditions and affect availability of fresh tomatoes in the domestic market. When asked whether there have been any changes to conditions of competition that are distinctive to the U.S. fresh tomatoes market between 2019 and 2025, 11 of 16 responding producers, 31 of 76 responding importers, and 10 of 25 purchasers reported there had been changes. Firms’ responses most frequently noted increased consumer demand favoring freshness, flavor, snacking varieties, and greenhouse-grown and vine-ripened products, increased customer requirements, more greenhouses and protected culture tomatoes, consolidation among greenhouse tomato producers, increased imports, decreased market stability due to the removal of the *2019 Suspension Agreement*, and more imports. Between July to December 2024 and July to December 2025, fewer firms noted changes (7 of 16 responding producers, 29 of 77 responding importers, and 3 of 24 purchasers) with respect to conditions distinctive to this market. While some firms noted the same changes between these periods as between 2019 and 2025 (such as the increased volatility due to the termination of the *2019 Suspension Agreement*), other purchasers noted different issues: less competition, less availability from Mexico but an advantage to other sources like Canada due to the imposition of the antidumping duties, and the lack of a minimum price creating cost uncertainty. A large majority of responding firms noted that seasonality had not changed between either time frame.

¹ See Part 1 for descriptions of various types of growing conditions.

² Investigation No. 731-TA-747 (Final): Fresh Tomatoes from Mexico, Confidential Report, INV-RR-122, November 14, 2019 (“2019 continued final investigation”), p. II-1.

Apparent U.S. consumption of fresh tomatoes increased by 6.6 percent during 2019 to 2025. The level of apparent U.S. consumption in 2025 was slightly below the level of apparent consumption in 2023.

U.S. purchasers

The Commission received 25 usable questionnaire responses from firms that had purchased fresh tomatoes since January 2019.³ Nine responding purchasers reported they are packers or re-packers, eight are supermarkets or retail chains, eight are wholesalers or brokers, three are food service firms or restaurants, and four are other types of firms.⁴ Responding U.S. purchasers were located throughout the United States.⁵

The quantity of purchases and imports of fresh tomatoes represented by those purchasers responding to the Commission's questionnaire increased between 2019 and 2025 (table 2.1).

Table 2.1 Fresh tomatoes: Purchasers' purchases and imports from the United States and other sources, 2019 and 2025

Quantity in thousands of pounds

Source	2019 quantity	2025 quantity
United States	800,910	936,153
Mexico	1,588,270	2,053,091
Canada	169,065	270,906
Other sources	258	661
Unknown sources	41	101,646
Total purchases	2,558,545	3,362,457

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Other sources include: Costa Rica, Dominican Republic, Ecuador, and Guatemala.

³ The following firms provided purchaser questionnaire responses: ***. Additionally, one purchaser provided a questionnaire response indicating that it had not purchased fresh tomatoes.

⁴ Three classified themselves as both distributor and another type of firm (e.g., marketer or seller with subsidiaries). One simply classified itself as a distributor.

⁵ Of the 25 responding purchasers, 20 purchased tomatoes U.S.-grown tomatoes, 24 purchased fresh tomatoes imported from Mexico, 21 from Canada, 6 from other sources, and 2 from unknown sources.

Purchasers were asked how they procure fresh tomatoes, and whether this structure for procuring fresh tomatoes has changed between 2019 and 2025, and between July to December 2024 and July to December 2025. The majority (18 of 25) purchasers noted that they have a single procurement method for all fresh tomato types and origins. Five purchasers reported separating fresh tomato procurement by the type of tomato, one purchaser reported separating fresh tomato procurement by the country of origin, and purchaser *** works with suppliers to bundle different types of 'hot house' produce together, for example buying cucumbers, bell peppers and tomatoes together, to improve freight rates. All but two purchasers reported that this structure did not change between 2019 and 2025,⁶ and all responding purchaser reported this structure did not change between July to December 2024 and July to December 2025.

Effect of changes in duty levels

The *2019 Suspension Agreement* affecting fresh tomatoes imported from Mexico was terminated on July 14, 2025. As noted in Part 1, its termination led to the issuance of an antidumping duty order on fresh tomatoes from Mexico⁷ beginning that day. When firms were asked about any effects on the fresh tomatoes market from these changes, 13 of 1 producers, 72 of 81 importers, 16 of 25 purchasers, and 178 of 200 foreign producers noted that there was an impact from this change. Firms noted a variety of effects on the fresh tomatoes market including effects on prices, availability, market uncertainty, acreage planted, and other effects. One producer noted that the change has resulted in it increasing its open-field tomato growing area, one producer indicated the change resulted in it decreasing its open-field growing area, two producers noted that the change has resulted in it increasing its controlled-environment hydroponic tomato growing area, and one producer indicated the change resulted in it decreasing its controlled-environment hydroponic tomato growing area. No producers reported changes in protected culture growing area. Firms' responses noting specific effects are presented in appendix D at tables D.1 through D.4.

⁶ Purchaser *** stated, "It was mostly unified and shifted, as long-term contracts took more and more presence over the years," and purchaser *** reported that its process has evolved as consumption increased.

⁷ For simplification in Part 2, the imposition of the antidumping duty order on fresh tomatoes from Mexico which entered into effect on July 14, 2025 will be referred to as the *Order*.

Firms were also asked whether there was any impact on the fresh tomatoes market from tariff announcements and tariff changes associated with Presidential actions since January 1, 2025 (e.g., changes in country or “reciprocal” tariffs, changes in section 232 coverage or level of tariffs). Eight of 12 responding producers, 46 of 67 responding importers, 8 of 16 responding purchasers, and 124 of 159 responding foreign producers indicated that the fresh tomatoes market was impacted by at least one change.⁸ Firms responses noting specific effects are presented in appendix D at tables D.5 through D.8. Firms generally reported impacts on prices, on domestic producers’ supply of fresh tomatoes, on the supply and availability of fresh tomatoes imported from Mexico and availability of tomatoes, and increased market uncertainty.

Channels of distribution

U.S. producers and importers of Mexican fresh tomatoes sold mainly to distributors while importers of fresh tomatoes sold mainly to retailers, as shown in table 2.2.⁹ In 2019 continued final investigation, U.S. producers sold mainly to packers/re-packers and distributors (solely noted as distributors in table 2.2), importers of tomatoes from Mexico sold mainly to distributors and supermarkets, and importers of tomatoes from nonsubject countries sold

***.¹⁰

⁸ In addition, 4 producers, 13 importers, 9 purchasers, and 48 foreign producers stated that they did not know if these announcements and/or changes had an impact. One producer indicated both “yes” and “no.”

⁹ Imports of fresh tomatoes from nonsubject countries other than Canada accounted for a very minor share of overall nonsubject imports and were accounted for by a very small number of importers with very low relative volumes. Changes in nonsubject shares are reflective of different importers’ market presence rather than a shift in any firm’s shipments to different channel of distribution.

¹⁰ 2019 continued final investigation, p. II-2 and table II-1.

Table 2.2 Fresh tomatoes: Share of U.S. shipments by source, channel of distribution, and period

Shares in percent; change in percentage points

Source	Channel	2019	2023	2024	2025	Change 2019-2025
United States	Distributors	76.2	76.8	74.2	77.2	▲1.0
United States	Retailers	9.0	7.4	9.7	8.6	▼(0.4)
United States	End users	14.8	15.8	16.0	14.2	▼(0.6)
Mexico	Distributors	58.9	56.6	56.6	56.9	▼(2.0)
Mexico	Retailers	29.7	31.6	32.4	32.3	▲2.7
Mexico	End users	11.5	11.8	10.9	10.8	▼(0.7)
Canada	Distributors	9.1	8.1	8.8	10.0	▲0.9
Canada	Retailers	85.6	83.2	83.5	84.5	▼(1.2)
Canada	End users	5.3	8.7	7.7	5.5	▲0.3
Other sources	Distributors	96.0	—	33.4	33.6	▼(62.5)
Other sources	Retailers	3.8	—	25.4	49.1	▲45.3
Other sources	End users	0.2	—	41.2	17.3	▲17.2
Nonsubject sources	Distributors	9.6	8.1	8.9	10.1	▲0.5
Nonsubject sources	Retailers	85.2	83.2	83.3	84.3	▼(0.8)
Nonsubject sources	End users	5.2	8.7	7.8	5.6	▲0.3
All import sources	Distributors	55.9	53.5	53.8	53.6	▼(2.3)
All import sources	Retailers	33.0	34.9	35.4	36.0	▲3.0
All import sources	End users	11.1	11.6	10.7	10.5	▼(0.7)

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Distributors include packers/re-packers; retailers includes supermarkets, grocery stores, and other retailers; and end users includes food service companies and restaurants. Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, no changes, null values, and undefined calculations are suppressed and shown as "—". Period changes preceded by a "▲" represent an increase, while period changes preceded by a "▼" represent a decrease.

Varietal shares

Purchasers were asked what proportion of their purchases in 2019 and 2025 were of seven different types of tomatoes, and if there was a change, to explain the change. Shares reported by purchasers are provided in table 2.3. During that period, the shares of Roma/plum tomatoes and cherry/grape tomatoes increased, while the share of round tomatoes and other varieties decreased. Purchaser ***'s response was indicative of many of other purchasers' responses regarding reasons for shifting away from mature green round tomatoes: "{Mature green round tomato purchases} declined as retail shifted away from mature greens open-field to vine-ripe protected culture, tomatoes with better flavor, aesthetics and much better supply stability."

Table 2.3 Fresh tomatoes: Purchasers shares based on different varieties and picking method, 2019 and 2025

Shares in percent; change in percentage points

Varietal and picking method	2019	2025	2019 to 2025 change in share
Rounds: mature green	18.9	16.3	▼(2.6)
Rounds: vine ripe	22.0	19.0	▼(3.0)
Rounds	40.9	35.3	▼(5.6)
Roma/plum: mature green	11.5	11.5	▲0.0
Roma/plum: vine ripe	21.9	27.3	▲5.4
Roma/plum	33.4	38.8	▲5.4
Cherry/grape: mature green	3.8	4.2	▲0.4
Cherry/grape: vine ripe	13.0	13.6	▲0.6
Cherry/grape	16.7	17.8	▲1.1
Other varieties	9.0	8.2	▼(0.8)

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Period changes preceded by a “▲” represent an increase, while period changes preceded by a “▼” represent a decrease.

Geographic distribution

In 2019, U.S. producers and importers reported selling fresh tomatoes to all regions in the contiguous United States. Thirteen of 15 responding U.S. producers and 68 of 75 importers reported that the region(s) that they ship to in the United States had not changed between 2019 and 2025, and 13 of 15 U.S. producers and 72 of 76 importers reported that the region(s) that they ship to in the United States had not changed since July 2025 when the *Order* was issued. Importer/producer *** stated that it was limited to delivering certain states and had to stay close to *** to meet the desired delivered price and minimum quantities. Three importers noted expanding into more regions, and one noted there was insufficient demand for exported fresh tomatoes, so it was forced to sell domestically.

For U.S. producers, *** percent of sales were within 100 miles of their production facility, *** percent were between 101 and 1,000 miles, and *** percent were over 1,000 miles in 2018. Importers sold *** percent within 100 miles of their U.S. point of shipment, *** percent were between 101 and 1,000 miles, and *** percent over 1,000 miles that year.¹¹

¹¹ Investigation No. 731-TA-747: Fresh Tomatoes from Mexico, Confidential Report, INV-RR-122, November 14, 2019, p. II-3.

Supply and demand considerations

U.S. supply

The majority of U.S. producers indicated that the availability of U.S.-produced fresh tomatoes in the U.S. market had changed since 2019. Table 2.4 provides a summary of the supply factors regarding fresh tomatoes from U.S. producers and from subject countries.

Table 2.4 Fresh tomatoes: Supply factors that affect the ability to increase shipments to the U.S. market, by country

Acreage in acres; harvest in thousands of pounds; ratio and share in percent

Factor	Measure	United States	Mexico
Acreage 2023	Acres	33,037	49,252
Acreage 2025	Acres	35,931	54,096
Harvest 2023	Quantity	1,275,049	3,968,467
Harvest 2025	Quantity	1,430,963	4,138,434
Yield 2023	Ratio	38,595	80,575
Yield 2025	Ratio	39,825	76,502
Inventories to total shipments 2019	Ratio	0.0	0.4
Inventories to total shipments 2025	Ratio	0.0	0.4
Home market shipments 2019	Share	97.8	29.1
Non-US export market shipments 2025	Share	2.2	1.6
Ability to shift production (firms reporting “yes”)	Count	11 of 16	101 of 211

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Responding U.S. producers accounted for the vast majority of U.S. production of fresh tomatoes in 2025. Responding foreign producer/exporter firms accounted for more than 75 percent of U.S. imports of fresh tomatoes from Mexico during 2025. For additional data on the number of responding firms and their share of U.S. production and of U.S. imports from each subject country, please refer to Part 1, “Summary Data and Data Sources.”

Domestic production

Based on available information, U.S. producers of fresh tomatoes have the ability to respond to changes in demand with moderate-to-large changes in the quantity of shipments of U.S.-produced fresh tomatoes to the U.S. market over the long term (longer than a growing season), but very limited ability to respond to changes in demand over the short term (within a growing season). The main contributing factors to this degree of responsiveness of supply over the long term are availability of unused capacity and some ability to shift production from other products to fresh tomatoes. Factors mitigating responsiveness of supply in the short term include a lack of inventories, limited ability to shift shipments from alternate markets, and

limited ability to shift immediate production capacity to or from fresh tomatoes due to the time necessary to prepare acreage and to grow the fresh tomatoes.

Domestic acreage devoted to fresh tomato production increased by 8.8 percent from 2023 to 2025 while the domestic fresh tomato harvest increased by 12.2 percent. Based on these changes, the quantity of pounds of fresh tomatoes per acre increased slightly (by 3.2 percent) between 2023 and 2025. Eleven of 16 responding producers indicated that land availability did not change between 2019 and 2025, and only 1 reported any changes between July to December 2024 and July to December 2025. The seasonal nature of fresh tomato production, perishability, a small share of shipments to markets outside of the United States, and the fixed amount of time required for tomatoes to grow are factors that limit U.S. producers' ability to respond to changes in the price of tomatoes with increased or decreased production in the short term. There is limited ability for U.S. producers to divert shipments from other markets as U.S. shipments of fresh tomatoes outside of the U.S. markets were slightly more than 2 percent of U.S. producers' total shipments in 2025. Canada was the most frequently noted export market.

U.S. producers were asked if there had been changes in the percentage of export sales of fresh tomatoes between the two sets of comparative periods. All producers reported that the percentage of their sales that were exported did not change between 2019 and 2025, though one producer reported that the percentage of its sales that were exported changed between July to December 2024 and July to December 2025.

Subject imports from Mexico

Based on available information, producers of fresh tomatoes from Mexico have the ability to respond to changes in demand with large changes in the quantity of shipments of fresh tomatoes to the U.S. market in the long term (e.g. longer than a growing season) and small-to-moderate changes in the quantities of shipments of fresh tomatoes to the U.S. market in the short term. The main contributing factor to this degree of responsiveness of supply in the long term is the availability of unused capacity. In both the short and long term, Mexican producers are also able to divert shipments of fresh tomatoes to the U.S. market from alternate markets and have some ability to shift future production from other products to fresh tomatoes. Factors mitigating supply responsiveness in the short term include a lack of inventories and limited ability to shift immediate production capacity to or from fresh tomatoes.

Mexican producers' fresh tomato acreage increased by 9.8 percent between 2023 and 2025, while production increased by 4.3 percent from 2023 to 2025. Total acreage available to fresh tomato production,¹² though, increased by a larger amount, from 83,556 acres in 2023 to 90,193 acres in 2025, or 7.9 percent. In 2019, the area devoted to growing fresh tomatoes was 73,468 acres. That year, 3.3 billion pounds were produced. Accordingly, fresh tomato production acreage in Mexico increased by 22.8 percent between 2019 and 2025 while production increased by 25.4 percent. Therefore, the per-acre yield of fresh tomatoes increased by 2.2 percent between 2019 and 2025 (but decreased by 3.4 percent between 2023 and 2025). Increasing acreage and yields, with more unused acreage available in Mexico suggests that Mexican producers may have a large ability to increase production of fresh tomatoes over the long term in response to an increase in price. The seasonal nature of fresh tomato production, perishability limiting inventories of the product, and the fixed amount of time required for tomatoes to grow limit Mexican producers' ability to respond to changes in the price of tomatoes with increased or decreased production in the short term. Shipments of fresh tomatoes to markets other than the U.S. market accounted for a very small share (slightly more than 2 percent) of Mexican producers' total shipments in 2019 and even smaller shares in 2023, 2024, and 2025 (slightly more than 1 percent in each year) while home market shipments ranged between 25.0 and 29.1 percent. Foreign producers have noted, however, that the tomatoes that they ship to their domestic market are typically lower quality than what is exported to the United States. This suggests that Mexican producers have a small-to-moderate ability to respond to price changes in the U.S. market by diverting shipments to the United States. In the longer term, foreign producers can shift acreage to or from the production of other crops (e.g., peppers, watermelon), leading to higher elasticity in the medium and long run. In August 2025, the Government of Mexico instituted floor prices for exports of fresh tomatoes of ranging from to \$0.40 per pound for Roma tomatoes to \$0.77 per pound for cherry, grape, cocktail, and heirloom tomatoes.¹³

Foreign producers were asked to describe their home market for fresh tomatoes, including the number of suppliers serving the market and the degree of competition between them. While some noted not selling in their home market, other foreign producers described several facets of their domestic market, including: lower quality tomatoes, lower and variable prices, a large number of Mexican producers, selling to distributors and directly in the home

¹² Acreage reported by Mexican foreign producers as growing fresh tomatoes only, growing fresh tomatoes and other crops, and left fallow.

¹³ "Mexico sets minimum export prices for fresh tomatoes," Reuters, August 10, 2025, <https://www.reuters.com/world/americas/mexico-sets-minimum-export-prices-fresh-tomatoes-2025-08-10/>, retrieved June 5, 2026.

market, the presence of large buyers, and a number of other conditions. Responses are included in appendix E, at table E.1. They were also asked whether characteristics of their home market had changed between 2019 and 2025, and from when the *Order* was issued in 2025 compared with the same time in 2024. Twenty-six of 184 responding foreign producers noted that there had been changes in their home market between 2019 and 2025, and 57 of 193 described changes in the market between July to December 2024 and July to December 2025 after the *Order* was issued. Most frequently foreign producers noted increased supplies and competition leading to lower prices, with many noting that tariffs were the cause of the changes.

Foreign producers were also asked whether they faced competition in Mexico from imports of fresh tomatoes and whether there had been any changes in between 2019 and 2025 from when the *Order* was issued in 2025 compared with the same time in 2024. The vast majority of foreign producers (more than 94 percent) noted that there was no foreign competition in their home market. An even larger majority of foreign producers also noted that there had been no change in this competition between 2019 and 2025, and over 92 percent indicated no changes in this competition between July to December 2024 and July to December 2025 after the *Order* was issued.

Whereas most foreign producers noted that they cannot shift sales of fresh tomatoes to/from other countries easily for various reasons (including distribution chains, logistics, operational expenses, phytosanitary and regulatory requirements, procedural barriers, and transportation costs among others), a minority reported that they could shift to third country markets. Of 198 responding foreign producers, 155 noted that this had not changed between 2019 and 2025, and 132 of 200 responding importers indicated their ability to shift had not changed between July to December 2024 and July to December 2025.

More than 110 foreign producers indicated that there were changes in the factors affecting the supply of fresh tomatoes in Mexico between 2019 and 2025 and between July to December 2024 and July to December 2025. Factors frequently noted as having changed were labor, production, and transportation costs, exchange rate changes, higher taxes and tariffs, the COVID-19 pandemic, new consumption patterns, market instability, price uncertainty, and new varieties causing lower production efficiency.

Imports from nonsubject sources

During the 2019 continued final investigation, imports of fresh tomatoes from nonsubject sources totaled 9.9 percent of reported U.S. imports of fresh tomatoes, with Canada reported to be the largest nonsubject source.¹⁴ In 2025, nonsubject imports accounted for 11.7 percent of total U.S. imports. Canada accounted for the largest portion (90.6 percent) of nonsubject imports during 2019 to 2025, followed by the Dominican Republic (4.9 percent) and Guatemala (4.0 percent).

Supply constraints and availability

Five of 16 U.S. producers reported that they had experienced supply constraints since 2019, while 3 indicated they had experienced supply constraints since July 2025 when the *Order* was put in place. U.S. producers indicated this was due to weather, diseases, crop loss, low production periods, crop cycles, and capacity constraints during peak demand since 2019 and both producers indicated the late 2025 constraint were related to high or increasing prices. Among importers, 24 of 80 had experienced supply constraints since 2019 and 31 of 78 have experienced them since July 2025. Frequently noted as causing supply constraints were weather events, not being able to reach pricing agreements, not being able to provide year-round supply to large purchasers, crop loss due to disease, labor migration, and lower prices in the United States than other markets.

Most purchasers (14 of 25) reported that at least one firm had refused, declined, or been unable to supply that purchaser with fresh tomatoes since 2019. Nearly all responding purchasers (18 of 20) indicated that they had faced constraints due to the weather (hurricanes, droughts, etc.). Purchasers noted that they had faced other supply issues at various times due to crop disease, pests, demand exceeding supply, and timing crop cycles.

Purchasers were also asked how frequently they attempted to mitigate the effects of supply constraints in six different ways when it was necessary to do so (table 2.5). Purchasers most frequently changed their supplying country or region. Many of these purchasers noted sourcing from multiple countries that allow them to maintain service levels for their consumers. Half of purchasers at least sometimes reduced their purchases. A majority of purchasers indicated that they never change the cultivation type, varietal type, or picking method of the fresh tomatoes they purchase in order to mitigate supply issues.

¹⁴ 2019 continued final investigation, p. II-9.

Table 2.5 Fresh tomatoes: Count of U.S. producers reporting the interchangeability between product produced in the United States and in other countries, by country pair

Mitigation technique	Always	Frequently	Sometimes	Never
Change supplying country	5	6	9	3
Change supplying region	6	6	9	1
Reduce purchases	1	2	8	11
Change cultivation type (open field, etc.)	1	1	6	14
Change varietal type (round, Roma, etc.)	1	1	9	11
Change picking method (mature green, vine ripe)	1	0	7	14

Source: Compiled from data submitted in response to Commission questionnaires.

When asked whether there were any specific supply constraints that were caused due to the termination of the *2019 Suspension Agreement*, 3 of 16 responding U.S. producers, 31 of 78 responding importers, and 5 of 20 responding purchasers replied that there had been some constraints. Of the firms that noted supply constraints due to its termination, producer/importer *** noted that its customers delisted items whose prices became too high, and producer/importer *** stated that the lack of U.S. supply caused the market to experience supply constraints and ongoing price increases to end users. Importer/purchaser *** reported reduced crossings for a week to meet the new tariff conditions, and application renewal caused further delays and some customer shortages. Importers generally noted higher and uncertain pricing, permitting issues, bond applications, and taxes led to fewer Mexican producers. Purchaser *** stated that Mexico has planted fewer tomatoes, contributing to higher costs in 2026, and purchaser/importer *** stated that Mexican growers either stopped or limited exports as well. Purchaser/importer *** stated that the “antidumping duty framework has increased working capital requirements through duty deposits, as well as administrative burden and financial risk for importers of record. These factors have led to adjustments in sourcing strategies, including reduced purchases from certain suppliers and a narrowing of the available supplier base. The transition has also reduced short-term sourcing flexibility, making it more difficult to respond to changes in supply and demand, particularly during peak or surplus periods. These additional supply constraints have ultimately exacerbated the supply-demand gap for CEA Hydroponic product in the U.S. that requires fulfillment from non-domestic producers and has made it more difficult ... to meet the uninterrupted volume demands of {its} customers.”

Purchasers were asked if availability of fresh tomatoes produced in the United States, Mexico, and Canada and other sources had changed in general between 2019 and 2025, as well as in the period in 2025 after the *Order* was issued (July to December) compared with the same period in 2024. As shown in table 2.6, a majority of purchasers noted that availability in all sources had changed between 2019 and 2025, but not between the period in 2024 and the period in 2025. Purchasers mostly noted decreased U.S. open field tomato availability and increased U.S. greenhouse, general Mexican, and greenhouse or general Canadian tomato availability.

Table 2.6 Fresh tomatoes: Count of firms' responses regarding availability changes of U.S. shipments by source and period

Source	No: 2019 to 2025	Yes; 2019 to 2025	No; Jul. to Dec. 2025 vs. Jul. to Dec. 2024	Yes; Jul. to Dec. 2025 vs. Jul. to Dec. 2024
United States	10	15	22	3
Mexico	11	14	19	6
Canada and other sources	11	11	22	1

Source: Compiled from data submitted in response to Commission questionnaires.

Purchasers were also asked how the availability of six specific types of fresh tomatoes had changed in the U.S. market between 2019 and 2025. Table 2.7 presents their responses. A majority of purchasers indicated that round mature green are available from domestic producers, but not from other sources. Vine-ripe varieties availability generally increased across tomato varieties. Vine-ripe cherry/grape tomato availability was noted to have increased or not changed by all purchasers for imports from Mexico and nonsubject sources, as was noted by most purchasers regarding the availability of domestic cherry/grape tomatoes.

Table 2.7 Fresh tomatoes: Count of firms' responses regarding overall domestic and foreign availability since 2019, by firm type

Market	Source	Steadily increase	Fluctuate upward	No change	Fluctuate downward	Steadily decrease
All tomatoes	United States	4	10	14	9	5
All tomatoes	Mexico	11	7	14	5	2
All tomatoes	Canada and others	8	7	11	3	1
Round mature green	United States	1	0	8	5	4
Round mature green	Mexico	1	0	12	3	1
Round mature green	Canada and others	2	0	11	2	1
Round vine-ripe	United States	3	5	10	4	1
Round vine-ripe	Mexico	5	5	9	3	0
Round vine-ripe	Canada and others	6	5	9	1	0
Roma/plum mature green	United States	1	2	7	5	2
Roma/plum mature green	Mexico	2	0	10	2	1
Roma/plum mature green	Canada and others	2	0	10	2	1
Roma/plum vine-ripe	United States	2	8	7	3	1
Roma/plum vine-ripe	Mexico	8	6	6	2	1
Roma/plum vine-ripe	Canada and others	6	6	8	1	0
Cherry/grape mature green	United States	1	0	10	2	3
Cherry/grape mature green	Mexico	2	0	11	1	1
Cherry/grape mature green	Canada and others	2	0	11	1	1
Cherry/grape vine-ripe	United States	4	5	9	3	2
Cherry/grape vine-ripe	Mexico	11	2	10	0	0
Cherry/grape vine-ripe	Canada and others	8	3	10	0	0

Source: Compiled from data submitted in response to Commission questionnaires.

Changes in growing conditions

Producers, importers, and purchasers were asked if there were any significant changes in how fresh tomatoes sold in the U.S. market are grown (e.g., open field vs. protected culture vs. controlled-environment hydroponic) between 2019 and 2025, as well as between July to December 2024, before the *Order* was issued, and July to December 2025, after the *Order* was issued, and foreign producers were asked if their own firm's growing environments has differed noticeably between the same time frames. Most firms (11 of 16 responding producers, 56 of 79 responding importers, 16 of 25 purchasers, and 135 of 208 responding foreign producers) indicated that there had been no changes in growing conditions between 2019 and 2025, with an even larger share (14 of 16 responding producers, 72 of 78 responding importers, 22 of 25 purchasers, and 161 of 208 responding foreign producers) indicating that there had been no changes in growing conditions after the *Order* was issued in July 2025 compared with the same time in 2024. Firms noted most frequently a shift away from open field tomato production and

toward controlled-environment hydroponic growing environments for domestic production, and toward both protected culture and controlled-environment hydroponic growing environments for Mexico.

U.S. demand

Based on available information, the overall demand for fresh tomatoes is likely to experience moderate changes in response to changes in price. The main contributing factors are the somewhat limited range of substitutes for fresh tomatoes and by the ability for consumers to abstain from or reduce purchases of fresh tomatoes when prices are elevated.

Product range, marketing, and packaging

Few responding U.S. producers (3 of 13) or foreign producers (31 of 199), but nearly half (38 of 80) of responding importers and more than half (13 of 24) of responding purchasers, indicated that there had been changes in the quantity or types of fresh tomatoes (e.g., the number of varieties) they sold or purchased between 2019 and 2025. Purchasers most frequently noted increased demand for, and varieties of snacking-type (e.g., cherry/grape) fresh tomatoes such as cherry tomatoes on the vine,¹⁵ and demand shifts away from the larger, round varieties. Whereas most importers also noted this shift, a few noted a shift to round tomatoes and away from Roma tomatoes. All but one responding producer, and at least 70 percent of responding importers, purchasers, and foreign producers indicated that there had been no changes in the quantity or types of fresh tomatoes they sold or purchased after the *Order* was issued in 2025 compared with the same period a year earlier.

Some producers (7 of 16) and responding importers (23 of 80), along with a majority of purchasers (13 of 25), indicated that there had been a significant changes in the marketing or packaging of fresh tomatoes between 2019 and 2025, whereas only 3 of 16 responding U.S. producers, 9 of 80 responding importers, and 3 of 24 responding purchasers indicated that there had been significant changes in the marketing or packaging of fresh tomatoes after the *Order* was issued in 2025 compared with the same time in 2024. Purchasers most frequently noted increased marketing of the newer/more flavorful snacking varieties of which they have increased production. Three purchasers noted changes in packaging (size of the pack, more clamshells and fewer open trays, move from virgin plastic to recycled plastic or other eco-friendly packaging), an increased focus on marketing with a personal connection, and increased

¹⁵ One importer/purchaser, *** gave examples of high-flavor varieties such as flavor bomb cherry on the vine, sugar bomb cherry on the vine, and Hirro cherry on the vine varieties, noting that staying on the vine increases shelf life.

branding among tomato suppliers. Several importers noted the same types of changes, with others adding that packaging sizes have gotten smaller, advancements in technology to extend freshness, shelf life, and provide better food safety and protection during transport.

Most (145 of 204) responding foreign producers indicated that the product range, product mix, and marketing of fresh tomatoes in Mexico did not differ from that of their exports to the United States or third-country markets. Foreign producers frequently noted exporting to the United States higher quality tomatoes, a greater range and greater specificity of tomato types and sizes, differing labeling and food safety standards/certification. More than three-quarters of responding foreign producers indicated that there had been no changes in these between 2019 and 2025 or after the *Order* was issued in 2025 and same period in 2024.

Business cycles and seasonality

In the 2019 continued final investigation, 13 of 23 U.S. producers, 32 of 52 importers, and 8 of 21 purchasers indicated that the market was subject to business cycles. Additionally, 15 of 21 purchasers indicated that the U.S. fresh tomato market was seasonal.¹⁶ Purchasers reported that factors such as weather further impacted business cycles. Importers reported that one region of the United States is always producing tomatoes, though there is an insufficient quantity of domestic vine-ripe tomatoes in winter months. Producers also noted less domestic production in winter months.

U.S. producers and importers were asked if there had been changes in business cycles/seasonality between the two sets of comparative periods. All but one producer and a large majority of responding importers (65 of 75) reported that business cycles/seasonality did not change between 2019 and 2025, while all producers and a similar number of responding importers (61 of 74) reported that business cycles/seasonality did not change between July to December 2024 and July to December 2025. Increased market uncertainty was noted by 5 of the 13 importers reporting changes in business cycles after the *2019 Suspension Agreement* was lifted and the *Order* was put in place. Seasonality can affect not just availability, but also pricing of fresh tomatoes. For example, one small U.S. producer noted that in its region, *** carry a “significant premium” reaching as high as \$3.00 per pound for a 25-pound box in some years.¹⁷

¹⁶ U.S. producers and importers were not asked specifically about seasonality, but it was mentioned by these firms in their responses regarding business cycles. 2019 continued final investigation, p. II-7.

¹⁷ Email from ***, June 5, 2026.

Purchasers were asked separately about changes in business cycles and seasonality. All but one responding purchaser reported that business cycles did not change between 2019 and 2025, nor between July to December 2024 and July to December 2025.

When asked to describe seasonality in the 2019 continued final investigation, various purchasers noted that there were seasonal differences between fresh tomatoes grown in the United States and those imported from Mexico, with some noting that climate conditions create high and low seasons for each geographic location; that during the summer months, temperatures are too high for tomato production in Mexico and are too low for production in Canada and some regions of the United States during the winter months; and that there are differences in availability, price, quantity, and variety. One purchaser noted that greenhouses allow the growing season to be year-round, while another reported differences in flavor, price, quality, and yield between tomatoes grown in open fields and greenhouses.¹⁸

A large majority of purchasers (22 of 25) reported that seasonality in the United States did not change between 2019 and 2025 in the United States, and all but one reported that seasonality did not change between July to December 2024 and July to December 2025. Slightly fewer purchasers reported that there were no changes in seasonality of Mexican fresh tomato production between the two time-frames (20 of 25 and 21 of 25, respectively). Purchasers noted more domestic and Mexican availability throughout the year and more local U.S. production to reduce mileage to purchasers, which increases freshness.

Demand trends

Majorities of responding producers, importers, purchasers, and foreign producers reported demand for all fresh tomatoes increased in the United States since 2019 (table 2.8). They were also asked to describe trends in demand for 6 types of fresh tomatoes – three varieties, each with two ripeness types. Despite the general increase in demand for fresh tomatoes overall, demand for round fresh tomatoes was more mixed, with a substantially greater number of firms indicating that demand for round mature green tomatoes steadily decreased or fluctuated downward than increased. In general, observations regarding demand for vine-ripe rounds and mature green Roma/plum varieties were mixed and increasing demand was noted by larger numbers of market participants for vine-ripe Roma/plum and cherry/grape tomatoes.

¹⁸ 2019 continued final investigation, pp. II-7 – II-8.

Table 2.8 Fresh tomatoes: Count of firms' responses regarding overall demand and demand by tomato type since 2019, by market and firm type

Market	Firm type	Steadily increase	Fluctuate upward	No change	Fluctuate downward	Steadily decrease
All fresh tomatoes	U.S. producers	4	4	1	3	3
All fresh tomatoes	Importers	12	28	12	8	2
All fresh tomatoes	Purchasers	8	5	9	1	0
All fresh tomatoes	Foreign producers	32	63	61	25	10
Round: mature green	U.S. producers	1	1	1	3	4
Round: mature green	Importers	1	3	14	7	6
Round: mature green	Purchasers	0	1	9	4	5
Round: mature green	Foreign producers	3	6	38	12	12
Round: vine-ripe	U.S. producers	3	2	2	6	1
Round: vine-ripe	Importers	7	15	20	10	4
Round: vine-ripe	Purchasers	4	5	11	3	0
Round: vine-ripe	Foreign producers	7	23	35	27	6
Roma/plum: mature green	U.S. producers	1	3	2	3	2
Roma/plum: mature green	Importers	3	6	15	5	5
Roma/plum: mature green	Purchasers	1	5	8	1	4
Roma/plum: mature green	Foreign producers	8	20	43	19	6
Roma/plum: vine-ripe	U.S. producers	3	5	1	3	1
Roma/plum: vine-ripe	Importers	20	19	14	6	1
Roma/plum: vine-ripe	Purchasers	8	7	7	2	0
Roma/plum: vine-ripe	Foreign producers	26	41	41	18	3
Cherry/grape: mature green	U.S. producers	0	0	1	1	2
Cherry/grape: mature green	Importers	1	3	17	1	5
Cherry/grape: mature green	Purchasers	3	1	9	1	6
Cherry/grape: mature green	Foreign producers	3	8	39	11	5
Cherry/grape: vine-ripe	U.S. producers	6	1	3	3	0
Cherry/grape: vine-ripe	Importers	23	13	14	5	4
Cherry/grape: vine-ripe	Purchasers	12	2	7	1	1
Cherry/grape: vine-ripe	Foreign producers	19	23	43	12	3

Source: Compiled from data submitted in response to Commission questionnaires.

Foreign producers in Mexico were asked to assess demand since 2019 in their home and export markets, as well as indicate how they anticipate demand in those markets to change (table 2.9). Foreign producers tended to note that demand in their home market and third-country export markets had increased or did not change.

Table 2.9 Fresh tomatoes: Count of foreign producers' responses regarding foreign market demand since January 1, 2019 and anticipated foreign market demand, by market

Market	Steadily increase	Fluctuate upward	No change	Fluctuate downward	Steadily decrease
Demand in Mexico	23	38	87	14	4
Demand in other export markets	8	15	60	3	2
Anticipated demand in Mexico	24	49	75	18	18
Anticipated demand in other export markets	9	20	53	3	3

Source: Compiled from data submitted in response to Commission questionnaires.

Substitute products

In the 2019 continued final investigation, almost all responding U.S. producers, importers, and purchasers reported that there were no substitutes for fresh tomatoes; frozen, canned, or preserved tomatoes were noted substitutes.¹⁹

Substitutability issues

This section assesses the degree to which U.S.-produced fresh tomatoes and imports of fresh tomatoes from subject countries can be substituted for one another by examining the importance of certain purchasing factors and the comparability of fresh tomatoes from domestic and imported sources based on those factors. Based on available data, staff believes that there is a moderate-to-high degree of substitutability between domestically produced fresh tomatoes and fresh tomatoes imported from subject sources.²⁰ Generally, tomatoes of the same type are used in the same manner regardless of the country of origin, which has led to somewhat infrequent preference for a country or origin or producer. A preponderance of fresh

¹⁹ 2019 continued final investigation, p. II-9.

²⁰ The degree of substitution between domestic and imported fresh tomatoes depends upon the extent of product differentiation between the domestic and imported products and reflects how easily purchasers can switch from domestically produced fresh tomatoes to the fresh tomatoes imported from Mexico (or vice versa) when prices change. The degree of substitution may include such factors as quality differences (e.g., grade standards, defect rates, etc.), and differences in sales conditions (e.g., lead times between order and delivery dates, reliability of supply, product services, etc.).

tomatoes grown domestically are mature green rounds grown in open fields, but smaller varieties are increasingly being grown in the United States in controlled hydroponic environments, the same environments that have been utilized more heavily by Mexican (and Canadian) producers. Mature green round tomatoes are also grown in Mexico and exported to the United States. Although this overlap exists, weather incidents and timing of fresh tomato availability due to differing growing seasons may affect substitutability between countries. More frequently noted substitution limitations occurred between types of fresh tomatoes rather than across the country of origin of the product. Quality and freshness were frequently noted important factors regardless of the growing method or type of fresh tomato purchased, and geographical logistics may affect these factors.

Factors affecting purchasing decisions

Purchaser decisions based on source

In 2019, multiple purchasers provided varying responses ranging from “always” to “never” with respect to whether they make purchasing decisions based on the country of origin or producer, indicating that the importance of producer and country of origin differs from firm to firm.²¹ Large majorities of purchasers, however, noted that their customers “sometimes” or “never” make purchasing decisions based on the produce or country of origin of the fresh tomatoes purchased (table 2.10). In this review, large majorities of purchasers indicated that the frequency with which they based purchasing decisions on producer (20) or country of origin (18) did not change between 2019 and 2025.²² The same number of purchasers indicated that they did not change their patterns based on producer (20) but four more purchasers reported basing their purchases on country of origin (22) between July to December 2024 and July to December 2025.

Table 2.10 Fresh tomatoes: Count of purchasers’ responses regarding frequency of purchasing decisions based on producer and country of origin from the 2019 continued final investigation

Firm making decision	Decision based on	Always	Usually	Sometimes	Never
Purchaser	Producer	8	2	3	8
Customer	Producer	1	4	5	11
Purchaser	Country	3	—	8	10
Customer	Country	—	2	9	10

Source: 2019 continued final investigation, table II-5.

²¹ 2019 continued final investigation, p. II-10.

²² All 25 purchasers responded to these questions, and one indicated that it both did and did not change its decisions based on country of origin between 2019 and 2025.

Seven of 25 purchasers indicated that there are certain grades, types, or varieties of fresh tomatoes that are only available from certain country sources. Most purchasers that responded affirmatively described that smaller/snacking/specialty/high-flavor varieties such as cherry, grape, cocktail, medley are only available from Canada and Mexico. They noted this was due to greenhouse/controlled-environment hydroponic production capacity in the United States. Purchaser *** noted that differences in availability could occur during certain times of year and provided an example of mature green tomatoes from Mexico, which are only available from Mexico (Nogales) in winter to early spring.

Most purchasers noted that their preferred country source or sources did not change between 2019 and 2025 (21 purchasers) or between July to December 2024 and July to December 2025 (22 purchasers). Of the four noting changes in 2019 to 2025, two purchasers reported shifting to more controlled-environment hydroponic/greenhouse tomatoes, one noted changing consumer buying trends and weather-related events, and the last described growth in the food service category as the reason for the switch. For the July to December 2024 to July to December 2025 time frame, one reported less Mexican supply, one reported fewer purchases from Mexico and more from Canada and the United States “to mitigate cost increases,” and the final purchaser (***) reported trade/policy uncertainty and cost adjustments after the TSA elimination caused “some rebalancing of sourcing between Mexico and domestic supply.”

In the 2019 continued final investigation, all responding purchasers reported that most or all of their purchases did not require purchasing U.S.-produced fresh tomatoes.²³ When asked if this had changed between 2019 and 2025, few (5 of 25) purchasers noted a change in the importance of purchasing domestic product. Purchaser *** stated that “Keeping programs focused on U.S.-grown products has become increasingly important, driven by the need for supply security, shorter lead times, and growing consumer preference for locally sourced goods.” Another purchaser (***) noted its customers prefer local tomatoes but U.S. growers do not have sufficient controlled-environment/protected culture capacity. Another purchaser (***) sources tomatoes that would improve freshness to its distribution centers. Only 3 of 25 purchasers noted changes between July to December 2024 and July to December 2025. One changed its preferences to improve cost efficiency, while another did so to mitigate duty impacts by increasing local purchases. The final purchaser, ***, as noted above, rebalanced due to trade/policy uncertainty and cost adjustments after the TSA was eliminated.

²³ 2019 continued final investigation, p. II-13.

Repacker product tracking

The 14 purchasers that identified themselves as repacking or relabeling tomatoes were asked a series of questions regarding some of their activities and whether those processes had changed between 2019 and 2025 and between July to December 2024 and July to December 2025, though some additional purchasers provided answers to some of the questions. Only 3 of the 14 responding repacking purchasers reported that they provide or arrange for ripening services to ripen mature green tomatoes.

The large majority (16 of 20) of responding purchasers reported that they always track separately or distinguish tomatoes grown in the United States, Mexico, and Canada, while 2 frequently do, 1 sometimes does, and 1 rarely or never does. Only one purchaser noted that this frequency had changed between 2019 and 2025 and between July to December 2024 and July to December 2025. Purchaser *** noted that TSA controls made tracking non-negotiable, and since the *2019 Suspension Agreement* terminated, the purchaser put more emphasis on Canadian and U.S. tomatoes to mitigate duties.

Whereas ten responding purchasers reported that they always track separately or distinguish tomatoes that are mature greens and vine ripe tomatoes, seven never do, two frequently do, and one sometimes does. Three purchasers indicated they never track because they only buy one type of tomato, one reported it never tracks because it is “rarely something relevant,” and one reported it has customers that require tomato grower audits. No purchaser noted that this frequency had changed between 2019 and 2025 or between July to December 2024 and July to December 2025.

Purchasers that repack tomatoes were also asked how frequently they substitute fresh tomatoes of the same tomato type but different origins in order to manage availability provided a customer’s specifications (type/grade/pack/food-safety) are met. With respect to mature green tomatoes, 8 of 18 of responding purchasers reported that they never substitute across fresh tomatoes of different origins, four sometimes do, two frequently do, and four always do. Slightly more substitution was reported with respect to vine ripe tomatoes: six responding purchasers reported that they never substitute across fresh tomatoes of different origins, five sometimes do, four frequently do, and five always do. Answers among the two types of tomatoes differed for two purchasers, and two additional purchasers responded for vine-ripe tomatoes because they do not purchase mature green tomatoes. Purchaser *** noted that its customers operate under origin-flexible, multi-origin agreements and will substitute as long as the tomatoes were grown in a controlled hydroponic environment. Purchaser *** noted the importance of “fill rates” – that it may have to shift growing regions to procure the same variety of vine-ripe tomatoes.

Most important purchase factors

In the 2019 continued final investigation, the most often cited top three factors firms considered in their purchasing decisions for fresh tomatoes were quality (19 firms), price/cost (15 firms), and availability/supply (15 firms), with quality the most frequently cited first-most important factor (cited by 11 firms), followed by availability/supply (5 firms).²⁴ In the current review, as presented in table 2.11, the most often cited top three factors firms considered in their purchasing decisions for fresh tomatoes were quality and/or taste (24 firms), price/delivered price (20 firms), and availability/reliable supply (13 firms), with quality the most frequently cited first-most important factor (cited by 14 firms), followed by food safety and price (4 firms each).

Table 2.11 Fresh tomatoes: Count of ranking of factors used in purchasing decisions as reported by purchasers, by factor

Factor	First	Second	Third	Total
Quality/taste	14	7	3	24
Price/delivered price	4	5	11	20
Availability/reliable supply	0	9	4	13
Reliability	1	4	3	8
Relationship/traditional supplier	1	2	3	6
Varieties/product range	0	3	2	5
Food safety	4	0	0	4
Service	1	0	1	2
Contracts	0	1	1	2
Greenhouse grown (hydroponic)	1	0	0	1
Innovation	1	0	0	1
All other factors	0	1	1	2

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Other factors include “Season length/volume year-round” as a second factor and “Credit” as a third factor. Ten purchasers identified more than just the top three important factors they listed. Some were factors which other purchasers listed in their top three (contracts, innovation, meeting food safety standards, price, reliable supply, traditional supplier, variety types) while others were unique (distance to market, environmental sustainability, packaging format, social programs, and social responsibility).

²⁴ 2019 continued final investigation, table II-6.

Only one purchaser reported that the importance of at least one of the top three factors had changed in importance between 2019 and 2025. *** stated “Availability of varieties has become more important, specifically around snacking/specialty products which has become a significant and distinct market segment.” No purchaser reported that the importance of any of their top three factors had changed in importance between July to December 2024 and July to December 2025.

In the 2019 continued final investigation, the majority of purchasers (12 of 21) reported that they only sometimes purchase the lowest-priced product.²⁵ In this review, 23 of 25 responding purchasers reported that their frequency of purchasing the lowest-price product did not change between both 2019 and 2025, and between July to December 2024 and July to December 2025.

Importance of specified purchase factors

Purchasers were asked to rate the importance of 24 factors in their purchasing decisions for fresh tomatoes grown using three different methods: controlled-environment hydroponic, protected culture, and open field (tables 2.12 to 2.14). The factors rated as very important by at least two-thirds of the responding purchasers²⁶ in all three of the growing environments were quality, freshness, product consistency, shelf life, availability, reliability of supply, firmness, availability, price, and color. In addition, sweetness/taste was reported to be very important by at least two-thirds of responding purchasers for controlled-environment hydroponic and protected culture tomatoes, but for less than half of responding purchasers of open field tomatoes. U.S. transportation costs were reported to be very important by two-thirds of responding purchasers for protected culture and open field tomatoes, but slightly less than 60 percent of responding purchasers of controlled-environment hydroponic tomatoes. Size was considered very important by more than 60 percent of responding purchasers for all tomato types as well. Table 2.15 presents side-by-side comparisons of which factors were rated as very important for tomatoes grown in each of the three environment types.

²⁵ 2019 continued final investigation, p. II-11.

²⁶ Twenty purchasers responded regarding the factors for fresh tomatoes grown in controlled hydroponic environments, 16 for fresh tomatoes grown in protected culture environments, and 17 for fresh tomatoes grown in open field environments.

Table 2.12 Fresh tomatoes: Share of purchasers' responses regarding importance of purchase factors for controlled-environment hydroponic fresh tomatoes, by factor

Factor	Very important	Somewhat important	Not important	Rank
Quality	90.9	4.5	4.5	1
Freshness	90.9	0.0	9.1	2
Product consistency	90.9	0.0	9.1	2
Shelf life	85.7	9.5	4.8	4
Reliability of supply	85.7	4.8	9.5	5
Firmness	81.8	9.1	9.1	6
Availability	77.3	13.6	9.1	7
Sweetness/taste	77.3	13.6	9.1	7
Price	72.7	22.7	4.5	9
Color	71.4	14.3	14.3	10
Size	65.0	30.0	5.0	11
U.S. transportation costs	59.1	27.3	13.6	12
Growing environment	52.6	31.6	15.8	13
Delivery terms	50.0	30.0	20.0	14
Availability year-round	45.0	40.0	15.0	17
Delivery time	45.0	40.0	15.0	17
Packaging	42.9	38.1	19.0	15
Production/harvest methods	42.9	33.3	23.8	16
Product range	28.6	42.9	28.6	19
Discounts offered	28.6	33.3	38.1	20
Payment terms	23.8	47.6	28.6	21
Minimum quantity requirements	23.8	33.3	42.9	22
Branding	19.0	42.9	38.1	23
Marketing	14.3	38.1	47.6	24

Source: Compiled from data submitted in response to Commission questionnaires.

Table 2.13 Fresh tomatoes: Share of purchasers' responses regarding importance of purchase factors for protected culture fresh tomatoes, by factor

Factor	Very important	Somewhat important	Not important	Rank
Quality	100.0	0.0	0.0	1
Freshness	94.4	5.6	0.0	2
Firmness	94.1	5.9	0.0	3
Product consistency	94.1	5.9	0.0	3
Price	88.9	11.1	0.0	5
Shelf life	88.2	11.8	0.0	6
Reliability of supply	88.2	5.9	5.9	7
Color	82.4	17.6	0.0	8
Availability	77.8	22.2	0.0	9
Size	68.8	31.3	0.0	10
U.S. transportation costs	66.7	27.8	5.6	11
Sweetness/taste	66.7	22.2	11.1	12
Delivery terms	56.3	18.8	25.0	13
Delivery time	52.9	23.5	23.5	14
Production/harvest methods	52.9	23.5	23.5	14
Availability year-round	41.2	47.1	11.8	16
Packaging	35.3	41.2	23.5	17
Payment terms	35.3	41.2	23.5	17
Discounts offered	35.3	35.3	29.4	19
Product range	35.3	35.3	29.4	19
Growing environment	31.3	56.3	12.5	21
Minimum quantity requirements	29.4	23.5	47.1	22
Branding	29.4	11.8	58.8	23
Marketing	18.8	43.8	37.5	24

Source: Compiled from data submitted in response to Commission questionnaires.

Table 2.14 Fresh tomatoes: Share of purchasers' responses regarding importance of purchase factors for open field fresh tomatoes, by factor

Factor	Very important	Somewhat important	Not important	Rank
Firmness	94.7	0.0	5.3	1
Quality	94.4	0.0	5.6	2
Availability	89.5	5.3	5.3	3
Price	89.5	5.3	5.3	3
Product consistency	89.5	5.3	5.3	3
Freshness	88.9	5.6	5.6	6
Reliability of supply	82.4	11.8	5.9	7
Color	72.2	22.2	5.6	8
Shelf life	70.6	23.5	5.9	9
U.S. transportation costs	66.7	22.2	11.1	10
Size	62.5	31.3	6.3	11
Delivery terms	50.0	22.2	27.8	12
Delivery time	50.0	22.2	27.8	12
Production/harvest methods	50.0	22.2	27.8	12
Sweetness/taste	47.1	23.5	29.4	15
Availability year-round	44.4	33.3	22.2	16
Product range	27.8	44.4	27.8	17
Packaging	27.8	38.9	33.3	18
Discounts offered	27.8	33.3	38.9	19
Payment terms	27.8	33.3	38.9	19
Growing environment	23.5	58.8	17.6	21
Minimum quantity requirements	22.2	16.7	61.1	22
Branding	16.7	16.7	66.7	23
Marketing	11.1	27.8	61.1	24

Source: Compiled from data submitted in response to Commission questionnaires.

Table 2.15 Fresh tomatoes: Factor rankings for very important purchase factors rated as very important among controlled-environment hydroponic, protected culture, and open field fresh tomatoes, by factor

Rank	Controlled-environment hydroponic	Protected culture	Open field
1	Quality	Quality	Firmness
2	(tie) Freshness Product consistency	Freshness	Quality
3	—	(tie) Firmness Product consistency	(tie) Availability Price Product consistency
4	Shelf life	—	—
5	Reliability of supply	Price	—
6	Firmness	Shelf life	Freshness
7	Availability Sweetness/taste	Reliability of supply	Reliability of supply
8	—	Color	Color
9	Price	Availability	Shelf life
10	Color	Size	U.S. transportation costs
11	Size	U.S. transportation costs	Size
12	U.S. transportation costs	Sweetness/taste	(tie) Delivery terms Delivery time Production/harvest methods
13	Growing environment	Delivery terms	—
14	Delivery terms	(tie) Delivery time Production/harvest methods	—
15	(tie) Availability year-round Delivery time	—	Sweetness/taste
16	—	Availability year-round	Availability year-round
17	Packaging	Packaging Payment terms	Product range
18	Production/harvest methods	—	Packaging
19	Product range	(tie) Discounts offered Product range	(tie) Discounts offered Payment terms
20	Discounts offered	—	—
21	Payment terms	Growing environment	Growing environment
22	Minimum quantity requirements	Minimum quantity requirements	Minimum quantity requirements
23	Branding	Branding	Branding
24	Marketing	Marketing	Marketing

Source: Compiled from data submitted in response to Commission questionnaires, tables 2.12 to 2.14.

Lead times

U.S. producers and importers do not hold inventories because fresh tomatoes are perishable. In the 2019 continued final investigation, U.S. producers reported lead times between a customer's order and date of delivery ranging from 1 to 45 days, with an average of 8 days. U.S. importers reported lead times ranging from 1 to 7 days, with an average of 3 days. In this review, all but one producer and all but one responding purchaser reported that lead times for U.S. product did not change between 2019 and 2025; no producer or purchaser

reported domestic lead times changing between July to December 2024 and July to December 2025. Most (66 of 74) responding importers (67 of 75) and purchasers (22 of 25) reported lead times for imports from Mexico did not change between 2019 and 2025, and even more (70 of 76 responding importers and 23 of 25 purchasers) indicated the same between July to December 2024 and July to December 2025. Of importers reporting that lead times had changed between July to December 2024 and July to December 2025, *** reported that logistical lead times have increased and become more volatile due to mandatory border inspections and enhanced customs documentation requirements. Similarly, importer *** reported that its warehouse operations became more efficient when its USDA inspection requirement was removed, while *** reported that in 2024, lead times were 23 hours, but in 2025, lead times increased to between 5 and 8 days. Purchaser *** stated that domestic lead times for both domestic and imported Mexican fresh tomatoes had decreased between 2019 and 2025.

Supplier certification

In the 2019 continued final investigation, a large majority of responding purchasers required their suppliers to become certified or qualified to sell fresh tomatoes to their firm, with the time to qualify a new supplier ranging from 1 to 180 days.

Minimum quality specifications

In the 2019 continued final investigation, 14 of 15 responding purchasers reported that domestically produced tomatoes “usually” met minimum quality specifications, 15 of 21 reported that Mexican fresh tomatoes “usually” met minimum quality specifications, and 10 of 11 reported that fresh tomatoes produced in other countries “usually” met minimum quality specifications.²⁷ In the present review, 21 of 25 purchasers reported that the quality of U.S.-produced fresh tomatoes had not changed between 2019 and 2025, as did 20 of 25 purchasers that reported on the quality of tomatoes imported from Mexico. Similarly, the quality of fresh tomatoes produced in the United States and in Mexico reportedly did not change between July to December 2024 and July to December 2025 for all but one purchaser.

²⁷ 2019 continued final investigation, table II-11.

Changes in purchasing patterns

Purchasers were asked about changes in their purchasing patterns since 2019 from different sources (table 2.16). Purchasers reported increased purchases of U.S.-produced product more frequently than decreased purchases. A greater number of purchasers noted increased purchases of fresh tomatoes from Mexico and Canada. Purchasers most frequently noted that demand for U.S. fresh tomatoes increased due to increases in fresh tomato demand. Reasons noted for reductions in demand for U.S. fresh tomatoes included changes in consumer buying trends, lower quality, weather, and year-over-year availability. Multiple purchasers reported increased purchases of product from Mexico because of general tomato demand increases, increased consumer demand for types of tomatoes grown in Mexico, quality, and year-round availability. Purchasers reported increased purchases of product from Canada because of increased sales, availability and quality.

Table 2.16 Fresh tomatoes: Count of purchasers' responses regarding changes in purchase patterns, by source of purchase

Source of purchase	Steadily increased	Fluctuated upward	No change	Fluctuated downward	Steadily decreased	Did not purchase
United States	6	6	4	4	2	2
Mexico	13	2	2	5	2	0
Canada	7	3	5	6	0	3
All other sources	0	2	5	3	0	12
Sources unknown	1	0	4	1	0	14

Source: Compiled from data submitted in response to Commission questionnaires.

Comparisons regarding interchangeability and non-price factors

In order to determine whether U.S.-produced fresh tomatoes can generally be used in the same applications as imports from Mexico, U.S. producers, importers, and purchasers were asked whether the products can always, frequently, sometimes, or never be used interchangeably. As shown in table 2.17, U.S. producers generally reported that they always can be used interchangeably, while importers reported that they frequently or sometimes can, and purchaser responses were mixed. Firms were also asked whether this interchangeability had changed. In describing changes, U.S. producer *** reported that customers are looking for more Canadian options due to the higher duties, while U.S. importer *** reported that there is more willingness to accept open-field tomatoes and *** reported that there is less open field production and more protected culture production.

Table 2.17 Fresh tomatoes: Count of U.S. producers, importers, and purchasers reporting on the interchangeability between product produced in the United States, Mexico, and Canada, by country pair

Country pair	Firm type	Always	Frequently	Sometimes	Never
U.S. vs. Mexico	Producer	10	2	3	0
U.S. vs. Canada	Producer	10	2	2	0
Mexico vs. Canada	Producer	10	2	2	0
U.S. vs. Mexico	Importer	9	20	23	10
U.S. vs. Canada	Importer	11	15	17	4
Mexico vs. Canada	Importer	12	15	18	6
U.S. vs. Mexico	Purchaser	10	8	5	0
U.S. vs. Canada	Purchaser	9	7	6	0
Mexico vs. Canada	Purchaser	10	6	6	0

Source: Compiled from data submitted in response to Commission questionnaires.

When asked whether there have been any changes to inter-country interchangeability between 2019 and 2025, 14 of 15 responding producers, 77 of 81 responding importers, and 21 of 23 responding purchasers, noted that there were no changes. Between July to December 2024 and July to December 2025, 14 of 15 responding producers, 73 of 81 responding importers, and all 23 responding purchasers also noted that there were no changes to inter-country interchangeability. U.S. importer *** reported that Mexican-grown tomatoes are increasingly being shipped into and marketed within Canada, creating greater flexibility in sourcing across North American markets, and that while it does not reflect a change in the fundamental product characteristics, it reflects an expansion in market channels and distribution patterns; this results in a higher degree of practical interchangeability between countries from a supply perspective. Importer *** reported that customers prefer locally grown tomatoes over imports. In discussing changes between July to December 2024 and July to December 2025, importer *** reported that as duties increased the costs of Mexican shipments, some buyers appear to have relied more on Canadian greenhouse tomatoes to maintain supply, resulting in Canadian product becoming a closer substitute in certain market segments, particularly for greenhouse-grown tomatoes during periods where Mexican shipments are reduced due to the additional financial burden associated with the duty.

Foreign producers were asked generally if the fresh tomatoes they produce and sell in Mexico are interchangeable with those they exported to the United States. Eighty-four of 206 responding foreign producers indicated that they are interchangeable. Several foreign producers that reported that the products are not interchangeable reported that the highest quality tomatoes are destined for the U.S. market, and that U.S. consumers often have more specifications for factors such as type, size, food safety specifications, firmness, shelf-life, color,

and packaging. When asked whether there have been any changes to this interchangeability between 2019 and 2025, 170 of 192 responding foreign producers noted that there were no changes. Between July to December 2024 and July to December 2025, 154 of 199 responding foreign producers also noted that there were no changes to this interchangeability. Foreign producers that reported changes between July to December 2024 and July to December 2025 generally reported the impacts of the duties and tariffs, lower profit margins, greater uncertainty, increased costs, and lower customer demand. Foreign producer *** reported that the USDA quality inspections that ensured that Mexican tomatoes met U.S. standards were suspended.

In addition to inter-country interchangeability, firms were asked to compare the interchangeability of fresh tomatoes based on what cultivation method was used to grow the tomatoes (open field, protected culture, and controlled-environment hydroponic). As presented in table 2.18, most responding importers and purchasers reported that different cultivation methods were sometimes or never interchangeable, while most producers reported that they always were. Importers generally cited lower production costs for open field tomatoes and added that open field tomatoes are less preferred and cost less than hydroponic or controlled-environment tomatoes. Other importers cited differences between controlled-environment and hydroponic tomatoes, reporting that hydroponic tomatoes were more expensive to produce. One importer, ***, reported that open field grape tomatoes are sometimes sold as greenhouse grown, which is a problem for the industry because open field grape tomatoes are cheaper to grow. Purchasers similarly reported differences between open field and controlled-environment produce, noting differences in production costs, quality, size, color, and product.

Table 2.18 Fresh tomatoes: Count of U.S. producers, importers, and purchaser reporting the interchangeability between product produced using different cultivation methods, by growing method pair

Growing method pair	Firm type	Always	Frequently	Sometimes	Never
Open field vs. protected culture	Producer	9	0	2	4
Open field vs. controlled env. hydroponic	Producer	9	0	1	6
Protected culture vs. controlled env. hydroponic	Producer	9	0	3	3
Open field vs. protected culture	Importer	4	15	25	14
Open field vs. controlled env. hydroponic	Importer	3	5	19	32
Protected culture vs. controlled env. hydroponic	Importer	4	14	27	15
Open field vs. protected culture	Purchaser	5	3	7	6
Open field vs. controlled env. hydroponic	Purchaser	3	1	3	14
Protected culture vs. controlled env. hydroponic	Purchaser	4	1	10	6

Source: Compiled from data submitted in response to Commission questionnaires.

When asked whether there have been any changes to interchangeability by cultivation method between 2019 and 2025, 13 of 16 responding producers, 77 of 81 responding importers, and 19 of 22 responding purchasers, noted that there were no changes. Between July to December 2024 and July to December 2025, all responding producers, all but one responding purchaser and all but two responding importers also noted that there were no changes to interchangeability by cultivation method. Two firms that indicated changes, *** and ***, cited changing consumer preferences towards vine-ripe tomatoes, which they report are sold at a higher price point and reduce the interchangeability between domestically produced tomatoes and product produced in Mexico. Purchaser *** reported that changes in weather and/or production related methods result in differing quality and aesthetics.

Firms were further asked to assess the interchangeability of fresh tomatoes of six different types.²⁸ Producer, importer, and purchaser responses are presented in tables 2.19 to 2.21. In general, a majority of responding producers reported that round mature green are always or frequently interchangeable with all varieties except for cherry/grape mature green and cherry/grape vine-ripe tomatoes. Most responding importers and nearly all purchasers reported that the listed varieties of tomatoes were sometimes or never interchangeable across varieties. Several importers reported that tomato types cannot be substituted for one another

²⁸ There is very little, if any, production of mature green cherry/grape tomatoes grown in North America. Nonetheless, several purchasers reported data comparing this type of fresh tomato with the other five types of fresh tomatoes. Nearly all of these comparisons were noted as this type of fresh tomato being never interchangeable with other fresh tomatoes.

and that their customers/retailers will reject it, while others report that all tomatoes can be interchanged with certain customers, or if the distributor requires it. When providing additional details, importer *** reported that Roma tomatoes are generally meatier, firmer, and lower in moisture, making them better suited for slicing in certain applications, cooking, and sauces, while round tomatoes are typically marketed for broader fresh consumption, including slicing and general table use. Importer *** reported that cherry/grape tomatoes are typically used for snacking and salads, while round and Roma/plum tomatoes are more commonly used for slicing, food service, or processing applications. Some purchasers reported that mature green can be substituted with vine ripe tomatoes, but that different types of tomatoes cannot be substituted for one another. Other purchasers report that tomato types cannot be substituted for one another. Purchaser *** added that there are no mature green cherry/grape tomatoes, while *** reported that when vine ripe round tomatoes are substituted for mature green round tomatoes, the vine ripened tomatoes need to be hand sorted and any soft ones must be removed.

Table 2.19 Fresh tomatoes: Count of U.S. producers assessing the interchangeability between different tomato types

First type	Second type	Always	Frequently	Sometimes	Never
Round mature green	Round vine-ripe	9	1	3	2
Round mature green	Roma/plum mature green	7	3	0	3
Round mature green	Roma/plum vine-ripe	6	4	1	4
Round mature green	Cherry/grape mature green	0	0	1	4
Round mature green	Cherry/grape vine-ripe	4	4	2	5
Round vine-ripe	Roma/plum mature green	8	2	0	4
Round vine-ripe	Roma/plum vine-ripe	7	3	2	3
Round vine-ripe	Cherry/grape mature green	0	0	1	6
Round vine-ripe	Cherry/grape vine-ripe	4	4	3	5
Roma/plum mature green	Roma/plum vine-ripe	8	2	3	2
Roma/plum mature green	Cherry/grape mature green	0	0	1	5
Roma/plum mature green	Cherry/grape vine-ripe	5	3	1	6
Roma/plum vine-ripe	Cherry/grape mature green	0	0	0	7
Roma/plum vine-ripe	Cherry/grape vine-ripe	5	3	3	5
Cherry/grape mature green	Cherry/grape vine-ripe	2	1	2	2

Source: Compiled from data submitted in response to Commission questionnaires.

Table 2.20 Fresh tomatoes: Count of U.S. importers assessing the interchangeability between different tomato types

First type	Second type	Always	Frequently	Sometimes	Never
Round mature green	Round vine-ripe	8	3	17	19
Round mature green	Roma/plum mature green	6	3	11	23
Round mature green	Roma/plum vine-ripe	5	3	9	31
Round mature green	Cherry/grape mature green	2	0	4	34
Round mature green	Cherry/grape vine-ripe	2	2	4	41
Round vine-ripe	Roma/plum mature green	5	3	12	27
Round vine-ripe	Roma/plum vine-ripe	7	9	24	18
Round vine-ripe	Cherry/grape mature green	2	0	4	40
Round vine-ripe	Cherry/grape vine-ripe	3	5	7	43
Roma/plum mature green	Roma/plum vine-ripe	9	4	13	20
Roma/plum mature green	Cherry/grape mature green	2	1	3	35
Roma/plum mature green	Cherry/grape vine-ripe	2	3	3	42
Roma/plum vine-ripe	Cherry/grape mature green	2	1	4	37
Roma/plum vine-ripe	Cherry/grape vine-ripe	3	6	5	44
Cherry/grape mature green	Cherry/grape vine-ripe	5	4	13	24

Source: Compiled from data submitted in response to Commission questionnaires.

Table 2.21 Fresh tomatoes: Count of U.S. purchasers assessing the interchangeability between different tomato types

First type	Second type	Always	Frequently	Sometimes	Never
Round mature green	Round vine-ripe	3	4	5	4
Round mature green	Roma/plum mature green	3	1	4	6
Round mature green	Roma/plum vine-ripe	2	1	4	10
Round mature green	Cherry/grape mature green	0	0	1	10
Round mature green	Cherry/grape vine-ripe	1	1	1	13
Round vine-ripe	Roma/plum mature green	2	1	4	10
Round vine-ripe	Roma/plum vine-ripe	2	1	8	10
Round vine-ripe	Cherry/grape mature green	0	0	1	13
Round vine-ripe	Cherry/grape vine-ripe	1	1	3	15
Roma/plum mature green	Roma/plum vine-ripe	5	5	4	3
Roma/plum mature green	Cherry/grape mature green	0	0	1	11
Roma/plum mature green	Cherry/grape vine-ripe	1	1	1	13
Roma/plum vine-ripe	Cherry/grape mature green	0	0	1	13
Roma/plum vine-ripe	Cherry/grape vine-ripe	1	1	3	15
Cherry/grape mature green	Cherry/grape vine-ripe	3	1	3	6

Source: Compiled from data submitted in response to Commission questionnaires.

After assessing this type of interchangeability, firms were asked if this type of interchangeability had changed between 2019 and 2025 or between July to December 2024 and July to December 2025. Very few producers, importers, and purchasers noted that there had been changes in this type of interchangeability between either of these comparative time frames. Those that did note changes in interchangeability by type noted that price may be a significant factor in consumer demand to purchase more or less of products that are more or less expensive, such as Roma versus cherry/grape tomatoes (***), and that Roma tomatoes are in higher demand (***). *** added that vine ripe tomatoes command a much higher price point, and that consumers have been showing an increased preference for vine-ripe tomatoes, especially snacking tomatoes.

Purchasers were asked to report the percentage of their 2025 purchases for which they substituted away from their preferred cultivation method, picking method, or tomato type due to unavailability or for other reasons. As shown in table 2.22, very few purchasers substituted away from their preferred tomato type, picking method, or cultivation method, and this accounted for a very small proportion of total purchases. Purchasers that substituted away from their preferred tomato type between July to December 2024 and July to December 2025 indicated that they substituted about 5 percent of hot house grown tomatoes for round tomatoes that are field-grown ***, and reported that they switched volumes from open-field to protected culture or greenhouse supply because of weather or seasonal transition ***.

Table 2.22 Fresh tomatoes: Count of purchasers substituting away from certain preferred tomato types, picking methods, or cultivation methods and share of their purchases in 2025

Cultivation method or tomato type	Count of purchasers that substituted	Percentage of 2025 purchases
Open field	4	4.3
Protected culture	2	10.0
Controlled-environment hydroponic	1	5.0
Mature green	3	35.0
Vine-ripe	2	30.0
Round	3	8.3
Roma/plum	3	8.3
Grape/cherry	2	10.0
Other varieties	2	10.0

Source: Compiled from data submitted in response to Commission questionnaires.

In addition, U.S. producers, importers, and purchasers were asked to assess how often differences other than price were significant in sales of fresh tomatoes from the United States, subject, or nonsubject countries. Most producers reported that they never were, while importer and purchaser responses were more varied (table 2.23). U.S. producer *** cited taste and freshness as non-price factors, adding that premium prices do not deter its customers from purchasing high quality tomatoes grown in greenhouses. U.S. producer *** reported that its customers rarely request domestic product or make purchasing decisions based on the country of origin if all other measurables meet the specifications, with hydroponically grown tomatoes and their corresponding quality/flavor being the primary decision-making driver. Several importers reported that tomatoes from Mexico and Canada are protected or controlled agriculture, which they report are better quality. Importer *** added that certain tomatoes, such as tomatoes on the vine, cannot be grown in Florida, only a small amount of these types can be grown in Arizona, and that the adapted/controlled-environment growing has put Mexico at the forefront on food safety and resulted in high flavor tomatoes with preferential varieties that cannot be grown in Florida due to exposure to weather issues such as hurricanes, freezes, and winter rains. Other importers cited non-price factors including: availability, consistency/continuity of supply, logistics costs, product uniformity, shelf-life, transportation network, and quality factors such as color, firmness, flavor, freshness, and ripeness. U.S. purchaser *** reported that domestically produced tomatoes do not have the quantity or quality level needed, while *** reported that it is generally always trying to find the best product at the best delivered price, that it takes inland freight into account, and that brokers let it know which shippers have good or available product.

Table 2.23 Fresh tomatoes: Count of U.S. producers, importers, and purchasers reporting the significance of differences other than price between product produced in the United States and in other countries, by country pair

Country pair	Firm type	Always	Frequently	Sometimes	Never
U.S. vs. Mexico	Producer	3	2	1	8
U.S. vs. Canada	Producer	3	2	0	8
Mexico vs. Canada	Producer	2	2	0	9
U.S. vs. Mexico	Importer	15	21	22	9
U.S. vs. Canada	Importer	11	15	12	7
Mexico vs. Canada	Importer	6	13	21	6
U.S. vs. Mexico	Purchaser	6	3	9	3
U.S. vs. Canada	Purchaser	6	2	7	3
Mexico vs. Canada	Purchaser	4	1	9	4

Source: Compiled from data submitted in response to Commission questionnaires.

When asked whether there have been any changes to the significance of differences in factors other than price between 2019 and 2025, all producers, 71 of 81 responding importers, and 20 of 21 responding purchasers noted that there were no changes. Between July to December 2024 and July to December 2025, all responding producers and purchasers and 71 of 81 importers noted that there were no changes to the significance of differences in factors other than price. Importers reporting changes between 2019 and 2025 cited changes in farming/production technology. Importer *** reported better irrigation systems and crop monitoring as changes, and added that inputs such as fertilizer, labor, packaging materials, and pesticides changed. Importer *** reported that transportation has increased over the years, that the ToBRFV (rugose virus) has played an important role, and that today, virus-resistant seeds are available. Importer *** reported that Canada is now a supplier in the winter after making significant investments in artificial lighting and cited NatureSweet's and Lipman's investments in Mexico. Importers reporting changes between July to December 2024 and July to December 2025 reported that approximately 25 percent more volume of fresh tomatoes from Mexico are available since the *Order* was imposed, while others reported variations in weather conditions, high prices, and commercial environment restrictions.

Elasticity estimates

This section discusses elasticity estimates; parties were encouraged to comment on these estimates in their prehearing or posthearing brief. In its prehearing brief, the parties Mastronardi and NatureSweet presented economic analyses of the fresh tomato market that used elasticities in their modeling but did not comment on staff's estimate of U.S. supply, U.S. demand, or substitution elasticity.²⁹

U.S. supply elasticity

The domestic supply elasticity for fresh tomatoes measures the sensitivity of the quantity supplied by U.S. producers to changes in the U.S. market price of fresh tomatoes. The elasticity of domestic supply depends on several factors including the level of excess capacity,

²⁹ See, e.g., NatureSweet's prehearing brief, exh. 8. In one of the provided analyses, a demand price elasticity for fresh tomatoes ranged from -0.53 to -0.83 depending on the specifications that were used in the computations. It further noted that the price elasticity of demand does not differ between U.S. and Mexican tomatoes, nor those of open field or greenhouse production." Id., p. 18. Though one analysis looks at cross-price elasticities at retail between types of tomatoes (such as those between Roma and cherry tomatoes, for example), it does not analyze the substitutability between U.S. and imported Mexican tomatoes which the elasticity of substitution measures.

the ease with which producers can alter capacity, producers' ability to shift to production of other products, the existence of inventories, and the availability of alternate markets for U.S.-produced fresh tomatoes. Analysis of these factors above indicates that the U.S. industry has a similar ability to change production as in previous investigations regarding fresh tomatoes from Mexico. Production levels still depend on factors such as acreage and the variety of tomatoes planted, which are chosen long before harvesting, and exogenous as factors such as weather conditions. Growers choose when to harvest tomatoes based on ripeness as well as market demand. Once harvested, tomatoes must be sold quickly to prevent spoilage, and therefore inventories at any time are rather low. U.S. growers have little ability to increase or decrease shipments to the U.S. market; equal to the previous estimate,³⁰ an estimate in the range of 0.03 to 0.37 is suggested. Over time, this would increase with the ability to change growing acreage and/or crops grown in current acreage.

U.S. demand elasticity

The U.S. demand elasticity for fresh tomatoes measures the sensitivity of the overall quantity demanded to a change in the U.S. market price of fresh tomatoes. This estimate depends on factors discussed above such as the existence, availability, and commercial viability of substitute products, as well as the component share of the fresh tomatoes in the production of any downstream products. As previously noted, changes in price may lead consumers to reduce their consumption of tomatoes in favor of other produce or eliminate tomatoes from their diet. In the 2019 continued final investigation, a price elasticity of demand estimate of -1 to -2 was suggested. Based on the facts presented in the current record of this changed circumstance review, the overall the demand elasticity for fresh tomatoes is likely to be moderately inelastic to moderately elastic; a range of -0.7 to -1.2 is suggested.

Substitution elasticity

The elasticity of substitution depends upon the extent of product differentiation between the domestic and imported products.³¹ Product differentiation, in turn, depends upon such factors as quality (e.g., chemistry, appearance, etc.) and conditions of sale (e.g., availability, sales terms/discounts/promotions, etc.). In the 2019 Continued final investigation, U.S. producers, U.S. importers, and U.S. purchasers reported a high degree of substitutability

³⁰ 2019 continued final investigation, p. II-19.

³¹ The substitution elasticity measures the responsiveness of the relative U.S. consumption levels of the subject imports and the domestic like products to changes in their relative prices. This reflects how easily purchasers switch from the U.S. product to the subject products or vice versa when prices change.

between domestic fresh tomatoes and imported fresh tomatoes from Mexico as well as other countries, including majorities of producers, importers, and purchasers noting frequent interchangeability among U.S., Mexican, and nonsubject fresh tomatoes.³² A higher proportion of firms in this review reported either less frequent interchangeability (importers) or a wider variety of responses (purchasers). Furthermore, interchangeability among different tomato types and growing environments, for which production may be concentrated in varying amounts across countries, showed an increased degree of responses noting less frequent interchangeability. Seasonality continues to cause purchasers of certain types to prefer tomatoes grown in different regions at different times of the year. Sales shares have been moving away from the type of tomato predominantly grown in the United States and to tomato types predominantly grown in Mexico (and Canada). Since substitution between these types of fresh tomatoes is more limited, the substitution elasticity is likely slightly decreased from the 2019 Continued final investigation's estimate of 5 to 10. Based on available information, the elasticity of substitution between U.S.-produced fresh tomatoes and imported fresh tomatoes is likely to be in the range of 3 to 8. As domestic controlled-environment hydroponic capacity increases, this estimate would increase as well.

³² 2019 continued final investigation, p. II-16 and table II-10.

Part 3: Condition of the U.S. industry

Overview

The information in this section of the report was compiled from responses to the Commission's questionnaires. All of the responding firms, which accounted for the majority of U.S. production of fresh tomatoes during 2025, supplied information on their operations in this review and the prior proceedings on fresh tomatoes.¹

Table 3.1 presents events in the U.S. industry since January 1, 2019.

Table 3.1 Fresh tomatoes: Developments in the U.S. industry since January 1, 2019

Item	Firm	Event
Expansion	Intergrow Greenhouses	In November 2022, New York-based greenhouse grower Intergrow Greenhouses announced the beginning of construction on a 10-acre greenhouse in New York.
Closure	AppHarvest	In July 2023, U.S.-based greenhouse grower AppHarvest filed for Chapter 11 bankruptcy to reduce its outstanding liabilities, leading to several of its greenhouse facilities being sold.
Weather conditions	---	In August 2023, Hurricane Idalia made landfall in Florida, affecting western-central and northern Florida; an estimated 3.5 million acres of agricultural lands were affected, with estimated production losses at \$276 million across all products.
Sale	NatureSweet	In September 2023, Silver Venture, the venture capital firm that previously owned Texas-based greenhouse grower NatureSweet, announced the sale of NatureSweet to Blue Road Capital, an investment firm that specializes in the food and beverage sector.
Acquisition	MightyVine	In September 2023, Canadian-based greenhouse producer Pure Flavor announced it acquired Illinois-based tomato grower MightyVine, which includes its 30-acre greenhouse facility near Chicago.
Expansion	NatureSweet	In February 2024, Texas-based greenhouse grower NatureSweet opened a 44-acre greenhouse growing facility in Arizona to grow both conventional and organic crops.
Change in policy	---	In April 2024, the U.S. Court of International Trade (CIT) invalidated a 2019 determination by the U.S. Department of Commerce (USDOC) that tomatoes from Mexico had been dumped into the United States, requiring the USDOC to

¹ One firm completed the U.S. producer questionnaire ***.

Item	Firm	Event
		reconsidering whether dumping had occurred. In May 2025, the USDOC released an amended determination in line with the CIT ruling.
Change in policy	---	In June 2024, the U.S. Department of Agriculture's Animal and Plant Health Inspection Service updated a federal order to permit the sale of tomatoes positive for tomato brown rugose fruit virus, allowing domestic growers to market fruit grown at facilities with detections of the virus rather than destroying it.
Acquisition	Lipman Family Farms	In July 2024, Florida-based Lipman Family Farms announced it acquired Jones & Church Farms of Tennessee to add to its farming network for the July to October growing season, committing to supplying stable, year-round produce to customers.
Weather conditions	---	In September 2024, Hurricane Helene made landfall in Florida, impacting southwestern and north-central Florida; an estimated 6.2 million acres of agricultural lands were affected, with estimated production losses at \$116.5 million across all products.
Weather conditions	---	In October 2024, Hurricane Milton made landfall in Florida, impacting western and central Florida; an estimated 5.7 million acres of agricultural lands were affected, with estimated production losses at \$428.0 million across all products.
Expansion	Lipman Family Farms	In July 2025, Florida-based Lipman Family Farms opened a new fresh-cut facility in California to provide sliced tomatoes to the foodservice industry.
Expansion	Pure Flavor	In September 2025, Canadian-based greenhouse producer Pure Flavor announced a planned 25-acre expansion of its Southern Flavor Farms greenhouse in Georgia to help supply year-round produce.
Sale	Del Monte Foods	In March 2026, Del Monte Foods, a U.S. producer and distributor of packaged food products (including canned tomatoes), announced its sale to several major buyers. Fresh Del Monte Produce acquired many of its vegetables, tomato, and refrigerated fruit brands and facilities, while Morning Star Tomatoes purchased the company's 670,000-square-foot tomato processing plant in California.

Table continued

Table 3.1 Fresh tomatoes (Continued): Developments in the U.S. industry since January 1, 2019

Sources: 90 FR 18645, May 1, 2025; Bluebook, "Indoor farming start-up AppHarvest files for Chapter 11 Bankruptcy protection," <https://www.bluebookservices.com/appharvest-files-chapter-11-bankruptcy/>, retrieved April 13, 2026; Fresh Del Monte Produce, "Fresh Del Monte Completes Acquisition of Select Del Monte Foods Assets," <https://freshdelmonte.com/news/fresh-del-monte-completes-acquisition-of-select-del-monte-foods-assets/>, retrieved April 15, 2026; Herrick, "NatureSweet opens greenhouse production facility in Arizona," <http://thepacker.com/news/produce-crops/naturesweet-opens-greenhouse-production-facility-arizona>, retrieved April 13, 2026; Karst, "Intergrow Greenhouses expands in New York," <https://www.thepacker.com/news/retail/intergrow-greenhouses-expands-new-york>, retrieved April 13, 2026; Lindt, "Morning Star Tomatoes buys Hanford Del Monte plant," https://hanfordsentinel.com/business/agriculture/morning-star-tomatoes-buys-hanford-del-monte-plant-john-lindt/article_f1f6e36e-feca-11ef-a4df-b3dd8a5cd420.html, retrieved April 15, 2026; Lore, "NatureSweet sold to investment firm that seeks to 'accelerate growth'," <https://www.thepacker.com/news/industry/naturesweet-sold-investment-firm-seeks-accelerate-growth>, retrieved April 13, 2026; The Packer, "APHIS deregulates tomato brown rugose fruit virus-positive produce for consumption," <https://www.thepacker.com/news/produce-crops/aphis-deregulates-tomato-brown-rugose-fruit-virus-positive-produce-consumption>, retrieved April 14, 2026; The Packer, "Lipman Family Farms acquires Jones & Church Farms in Tennessee," <https://www.thepacker.com/news/industry/lipman-family-farms-acquires-jones-church-farms-tennessee>, retrieved April 13, 2026; The Packer, "NatureSweet applauds decision by trade court on Mexican tomatoes," <https://www.thepacker.com/news/industry/naturesweet-applauds-decision-trade-court-mexican-tomatoes>, retrieved April 14, 2026; Strailey, "Lipman Family Farms Expands Fresh-Cut Operations," <https://www.thepacker.com/news/foodservice/lipman-family-farms-expands-fresh-cut-operations>, retrieved July 31, 2025; Strailey, "Pure Flavor acquires MightyVine, continues strategic regional investments," <https://www.thepacker.com/news/industry/pure-flavor-acquires-mightyvine-continues-strategic-regional-investments>, retrieved April 13, 2026; U.S. Court of International Trade, *Bioparques de Occidente, S.A. de C.V. et al. v. United States*, <https://www.cit.uscourts.gov/sites/cit/files/24-45.pdf>, retrieved April 14, 2026; University of Florida, *Agricultural Losses and Damages from Hurricane Helene*, <https://fred.ifas.ufl.edu/media/fredifasufledu/economic-impact-analysis/reports/FRE-Hurricane-Helene-EIAP-Summary-Final.pdf>, retrieved April 15, 2026; University of Florida, *Agricultural Losses and Damages from Hurricane Milton*, <https://fred.ifas.ufl.edu/media/fredifasufledu/economic-impact-analysis/reports/FRE-Hurricane-Milton-EIAP-Summary-Final.pdf>, retrieved April 15, 2026; University of Florida, *County-Level Agricultural Losses from Hurricane Idalia*, [https://fred.ifas.ufl.edu/media/fredifasufledu/economic-impact-analysis/reports/FRE-Hurricane-Idalia-County-Level-Factsheet-2025-\(1\).pdf](https://fred.ifas.ufl.edu/media/fredifasufledu/economic-impact-analysis/reports/FRE-Hurricane-Idalia-County-Level-Factsheet-2025-(1).pdf), retrieved April 15, 2026.

Table 3.2 presents a list of hurricanes since 2019 that have affected agricultural production in Florida's tomato-producing regions. Although the list may not be exhaustive, it includes estimates of agricultural losses as measured by studies from the University of Florida's Institute of Food and Agricultural Sciences (IFAS). IFAS defines agricultural losses as near-term production losses that were expected to follow the hurricane within the same calendar or marketing year. The estimated agricultural losses do not account for crop losses that were eligible or covered by crop insurance (or other risk management tools available) and do not include the value of damage to assets (e.g., agricultural structures, equipment, infrastructure,

perennial plantings), inputs (e.g., fuel for farm equipment, fertilizer), and inventory (i.e., previously harvested crops that were stored on-farm and not sold yet).

Table 3.2 Fresh tomatoes: Hurricanes in Florida since 2019 that have likely impacted tomato production

Hurricane	Year	Affected Regions	Damage Assessment (Estimated)	Notes
Milton	2024	Southwest Florida Central Florida	\$142 million in agricultural losses for vegetables, melons, and potatoes (adjusted to 2024 dollars), with over 202,000 acres of land used for their production impacted.	Counties that saw losses greater than \$10 million for vegetables, melons, and potatoes (adjusted to 2024 dollars) include Collier (\$21 million), Hillsborough (\$10 million), and Manatee (\$55 million). Florida's estimated value of annual production of vegetables, melons, and potatoes was \$2.3 billion, according to IFAS calculations using USDA NASS data.
Helene	2024	North Central Florida	\$32 million in agricultural losses for vegetables, melons, and potatoes (adjusted to 2024 dollars), with nearly 204,000 acres of land used for their production impacted.	No counties saw losses greater than \$10 million for vegetables, melons, and potatoes (adjusted to 2024 dollars). Florida's estimated value of annual production of vegetables, melons, and potatoes was \$2.3 billion, according to IFAS calculations using USDA NASS data.
Idalia	2023	North Central Florida	\$135 million in agricultural losses for vegetables, melons and potatoes (adjusted to 2023 dollars), with over 65,000 acres of land used for their production impacted.	Counties that saw losses greater than \$10 million for vegetables, melons, and potatoes (adjusted to 2023 dollars) include Hillsborough (\$11 million) and Manatee (\$67 million).

Hurricane	Year	Affected Regions	Damage Assessment (Estimated)	Notes
				Florida's estimated value of annual production of vegetables, melons, and potatoes was \$853 million, according to IFAS calculations using USDA NASS data.
Ian	2022	Southwest Florida	\$204 million in agricultural losses for vegetables and melons (adjusted to 2022 dollars), with over 159,000 acres of land used for their production impacted.	Counties that saw losses greater than \$10 million for vegetables and melons (adjusted to 2022 dollars) include Collier (\$22 million), Hendry (\$18 million), Hillsborough (\$11 million), and Manatee (\$89 million). Florida's estimated value of annual production of vegetables and melons was \$1.6 billion, according to IFAS calculations using USDA NASS data.

Sources: University of Florida, *Estimated Agricultural Losses Resulting from Hurricane Milton*, <https://fred.ifas.ufl.edu/media/fredifasufledu/economic-impact-analysis/disasters/FRE-Final-Hurricane-Milton-Report.pdf>, retrieved May 29, 2026; University of Florida, *Estimated Agricultural Losses Resulting from Hurricane Helene*, <https://fred.ifas.ufl.edu/media/fredifasufledu/economic-impact-analysis/reports/FRE-Hurricane-Helene-Final-Report.pdf>, retrieved May 29, 2026; University of Florida, *Estimated Agricultural Losses Resulting from Hurricane Idalia*, <https://fred.ifas.ufl.edu/media/fredifasufledu/economic-impact-analysis/reports/FRE-Final-Hurricane-Idalia-Report-June2025.pdf>, retrieved May 29, 2026; University of Florida, *Estimated Agricultural Losses Resulting from Hurricane Ian*, <https://fred.ifas.ufl.edu/media/fredifasufledu/economic-impact-analysis/reports/FRE-Final-Hurricane-Ian-Report.pdf>, retrieved May 29, 2026; U.S. Department of Agriculture, *2022 Census of Agriculture*, https://www.nass.usda.gov/Publications/AgCensus/2022/Full_Report/Volume_1_Chapter_1_US/usv1.pdf, retrieved May 29, 2026.

Note: Although the studies conducted by IFAS do not estimate agricultural losses for specific products, tomatoes production falls under the broader category identified as "Vegetables, Melons, and Potatoes," in line with the 2022 Census of Agriculture by the U.S. Department of Agriculture.

Changes experienced by the industry

Producers in the United States were asked to report any change in the character of their operations or organization relating to the production of fresh tomatoes since January 1, 2019. Nearly all U.S. producers indicated in their questionnaires that they had experienced such changes. Table 3.3 presents the changes identified by these producers.

Table 3.3 Fresh tomatoes: U.S. producers' reported changes in operations since January 1, 2019

Type of change	Firm name and narrative on changes in operations
New acreage planted	***
New acreage planted	***
New acreage planted	***
New acreage planted	***
New acreage planted	***
New acreage planted	***
Acreage replaced with new plants	***
Acreage replaced with new plants	***
Acreage replaced with new plants	***
Acreage replaced with new plants	***
Acreage replaced with new plants	***
Acreage replaced with new plants	***
Acreage taken out of production	***
Acreage taken out of production	***
Acreage taken out of production	***
Acreage taken out of production	***
Acreage taken out of production	***
Acreage taken out of production	***
Packing and/or chilling operation openings	***
Packing and/or chilling operation openings	***
Packing and/or chilling operation openings	***
Packing and/or chilling operation closings	***
Packing and/or chilling operation closings	***
Packing and/or chilling operation closings	***

Table continued

Table 3.3 Fresh tomatoes (Continued): U.S. producers' reported changes in operations since January 1, 2019

Type of change	Firm name and narrative on changes in operations
Disease or pest-related events	***
Disease or pest-related events	***
Disease or pest-related events	***
Disease or pest-related events	***
Disease or pest-related events	***
Changes in labor availability or costs	***
Changes in labor availability or costs	***
Changes in labor availability or costs	***
Changes in labor availability or costs	***
Changes in labor availability or costs	***
Changes in labor availability or costs	***
Changes in labor availability or costs	***
Changes in labor availability or costs	***
Development of agricultural land	***
Shift in product mix between products	***
Shift in product mix between products	***
Shift in product mix between products	***
Shift in product mix between products	***

Table continued

Table 3.3 Fresh tomatoes (Continued): U.S. producers' reported changes in operations since January 1, 2019

Type of change	Firm name and narrative on changes in operations
Expansion into distribution/other levels supply chain	***
Expansion into distribution/other levels supply chain	***
Expansion into distribution/other levels supply chain	***
Changes in customer program structure	***
Changes in customer program structure	***
Changes in customer program structure	***
Weather-related or force majeure events	***
Weather-related or force majeure events	***
Weather-related or force majeure events	***
Weather-related or force majeure events	***
Weather-related or force majeure events	***
Weather-related or force majeure events	***

Table continued

Table 3.3 Fresh tomatoes (Continued): U.S. producers' reported changes in operations since January 1, 2019

Type of change	Firm name and narrative on changes in operations
Changes since AD order took effect	***
Changes since AD order took effect	***
Changes since AD order took effect	***
Changes since AD order took effect	***
Other	***
Other	***
Other	***
Other	***
Other	***

Source: Compiled from data submitted in response to Commission questionnaires.

Constraints on growing

All of the responding U.S. producers reported constraints in the growing/harvesting process. Table 3.4 presents U.S. producers' reported growing constraints.

Table 3.4 Fresh tomatoes: U.S. producers' reported growing constraints, by type of constraint and firm

Type of constraint	Firm name and narrative on constraints to growing
Growing/harvesting bottlenecks	***
Growing/harvesting bottlenecks	***
Growing/harvesting bottlenecks	***
Growing/harvesting bottlenecks	***
Growing/harvesting bottlenecks	***
Existing labor force	***
Existing labor force	***
Existing labor force	***
Existing labor force	***
Existing labor force	***
Existing labor force	***
Existing labor force	***
Existing labor force	***
Existing labor force	***
Existing labor force	***
Existing labor force	***
Existing labor force	***
Supply of material inputs	***
Supply of material inputs	***
Fuel or energy	***
Fuel or energy	***
Fuel or energy	***
Fuel or energy	***

Table continued

Table 3.4 Fresh tomatoes (Continued): U.S. producers' reported growing constraints, by type of constraint and firm

Type of constraint	Firm name and narrative on constraints to growing
Storage capacity	***
Storage capacity	***
Storage capacity	***
Storage capacity	***
Logistics/transportation	***
Other constraints	***
Other constraints	***
Other constraints	***
Other constraints	***
Other constraints	***
Other constraints	***
Other constraints	***
Other constraints	***

Source: Compiled from data submitted in response to Commission questionnaires.

Growing and harvesting operations

The Commission asked domestic producers to report anticipated changes in the character of their operations relating to the production of fresh tomatoes. Their responses appear in tables 3.5 (growing period and method) and 3.6 (harvesting period and growing method) and figures 3.1 and 3.2.

Table 3.5 Fresh tomatoes: Count of U.S. producers' indicating peak growth periods, by month and growing method

Month	Hydroponic	Protected	Open	Any growing method
January	6	0	5	11
February	7	0	6	12
March	7	0	6	12
April	7	0	7	13
May	7	0	8	14
June	7	1	8	15
July	7	1	8	15
August	7	1	9	16
September	7	1	9	16
October	7	1	9	16
November	7	0	4	10
December	4	0	5	9

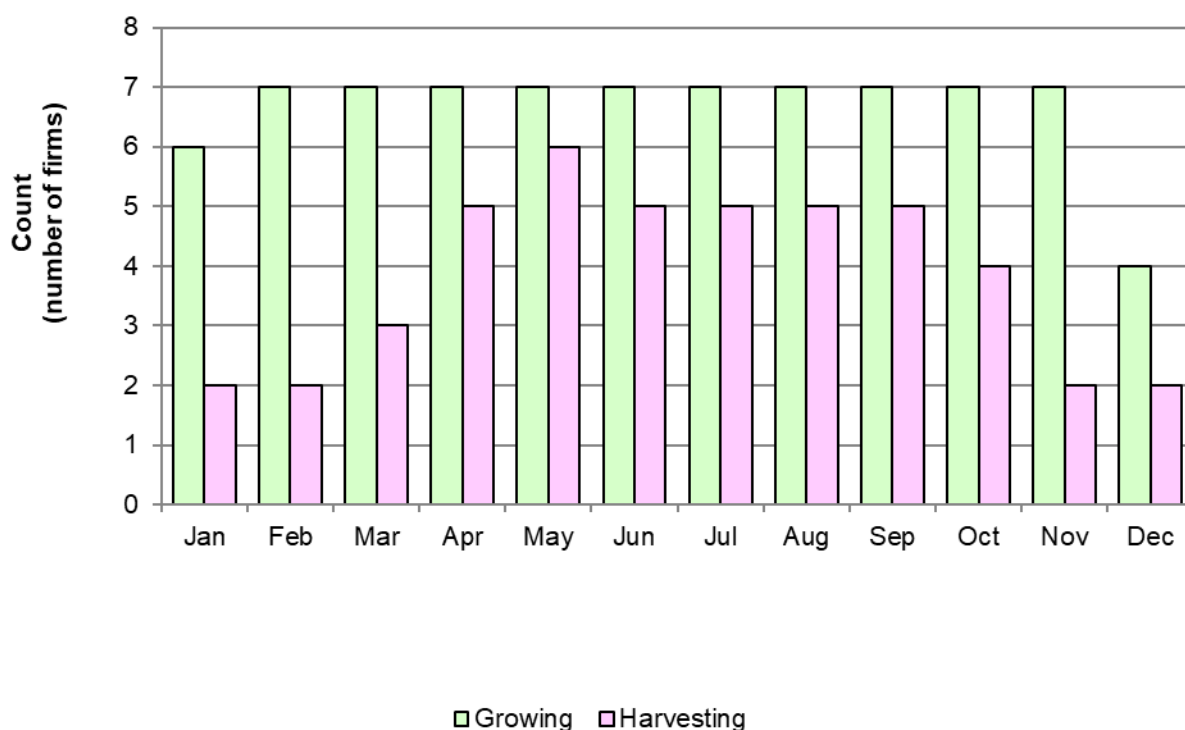
Source: Compiled from data submitted in response to Commission questionnaires.

Table 3.6 Fresh tomatoes: Count of U.S. producers' indicating peak harvesting periods, by month and growing method

Month	Hydroponic	Protected	Open	Any growing method
January	2	0	5	7
February	2	0	4	6
March	3	0	5	8
April	5	0	5	9
May	6	0	5	10
June	5	1	5	10
July	5	1	7	12
August	5	1	7	12
September	5	1	7	12
October	4	1	7	12
November	2	0	7	9
December	2	0	5	7

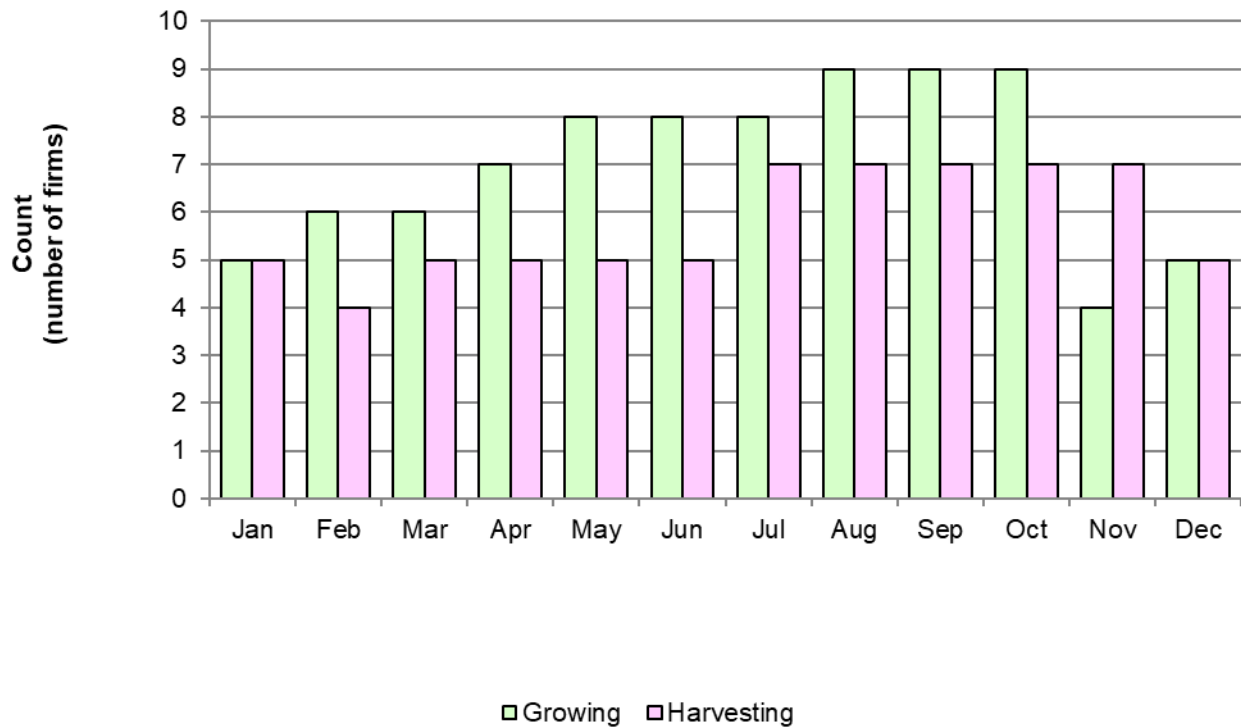
Source: Compiled from data submitted in response to Commission questionnaires.

Figure 3.1 Fresh tomatoes: Count of U.S. producers' indicating peak growth and harvesting periods, for hydroponic growing methods



Source: Compiled from data submitted in response to Commission questionnaires.

Figure 3.2 Fresh tomatoes: Count of U.S. producers' growing and harvesting months for open growing methods



Source: Compiled from data submitted in response to Commission questionnaires.

U.S. growing, harvesting, and packaging

Tables 3.7 presents U.S. producers' assigned acreage, table 3.8a presents U.S. producers' hydroponic growing methods, table 3.8b presents U.S. producers' protected culture growing methods, table 3.9 presents U.S. producers' open field growing methods², table 3.10 presents harvesting related production activities, and table 3.11 presents packaging related production activities by product type and period.

Table 3.7 Fresh tomatoes: U.S. producers' assigned acreage, by product type and period

Quantity in acres; Share in percent; Change in percent for quantity lines and change in percentage points for share and ratio lines

Product type	Measure	2019	2023	2024	2025	2019-2025 Change
Fresh tomatoes only	Quantity	23,128	22,511	24,252	24,369	▲ 5.4
Fresh tomatoes and other crops	Quantity	712	10,526	12,306	11,562	▲ 1,523.9
Other crops only	Quantity	2,726	4,110	4,554	4,695	▲ 72.2
Left fallow	Quantity	425	5,125	5,142	6,234	▲ 1,366.8
Total acreage	Quantity	26,991	42,272	46,254	46,860	▲ 73.6
Fresh tomatoes only	Share	85.7	53.3	52.4	52.0	▼ (33.7)
Fresh tomatoes and other crops	Share	2.6	24.9	26.6	24.7	▲ 22.0
Other crops only	Share	10.1	9.7	9.8	10.0	▼ (0.1)
Left fallow	Share	1.6	12.1	11.1	13.3	▲ 11.7
Total acreage	Share	100.0	100.0	100.0	100.0	—

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "—". Ratio is to acreage within each product type for all growing methods (table 3.7).

² At the Commission's hearing, a witness from the Fresh Produce Association of the Americas observed that open field acreage is very large, while greenhouse acreage is not nearly as large. However, in the witness's view, acreage is not the best way to compare the two growing methods. The witness indicated that greenhouse tomato growing can result in up to ten times the production volume of open field harvesting of fresh tomatoes. Hearing transcript, pp. 103 to 104 (Badillo).

Table 3.8A Fresh tomatoes: U.S. producers' using hydroponic growing methods' assigned acreage, by product type and period

Quantity in acres; Share in percent; Change in percent for quantity lines and change in percentage points for share and ratio lines

Product type	Measure	2019	2023	2024	2025	2019-2025 Change
Fresh tomatoes only	Quantity	***	***	***	***	▲ ***
Fresh tomatoes and other crops	Quantity	***	***	***	***	***
Other crops only	Quantity	***	***	***	***	▲ ***
Left fallow	Quantity	***	***	***	***	▼ ***
Total acreage	Quantity	***	***	***	***	▲ ***
Fresh tomatoes only	Share	***	***	***	***	▲ ***
Fresh tomatoes and other crops	Share	***	***	***	***	***
Other crops only	Share	***	***	***	***	▲ ***
Left fallow	Share	***	***	***	***	▼ ***
Total acreage	Share	100.0	100.0	100.0	100.0	—
Fresh tomatoes only	Ratio	***	***	***	***	▲ ***
Fresh tomatoes and other crops	Ratio	***	***	***	***	***
Other crops only	Ratio	***	***	***	***	▼ ***
Left fallow	Ratio	***	***	***	***	▼ ***
Total acreage	Ratio	***	***	***	***	▼ ***

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "—". Ratio is to acreage within each product type for all growing methods (table 3.7).

Table 3.8B Fresh tomatoes: U.S. producers' using protected culture growing methods' assigned acreage, by product type and period

Quantity in acres; Share in percent; Change in percent for quantity lines and change in percentage points for share and ratio lines

Product type	Measure	2019	2023	2024	2025	2019-2025 Change
Fresh tomatoes only	Quantity	***	***	***	***	▼ ***
Fresh tomatoes and other crops	Quantity	***	***	***	***	***
Other crops only	Quantity	***	***	***	***	▲ ***
Left fallow	Quantity	***	***	***	***	***
Total acreage	Quantity	***	***	***	***	***
Fresh tomatoes only	Share	***	***	***	***	▼ ***
Fresh tomatoes and other crops	Share	***	***	***	***	***
Other crops only	Share	***	***	***	***	▲ ***
Left fallow	Share	***	***	***	***	***
Total acreage	Share	100.0	100.0	100.0	100.0	—
Fresh tomatoes only	Ratio	***	***	***	***	▼ ***
Fresh tomatoes and other crops	Ratio	***	***	***	***	▼ ***
Other crops only	Ratio	***	***	***	***	▼ ***
Left fallow	Ratio	***	***	***	***	***
Total acreage	Ratio	***	***	***	***	▼ ***

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "—". Ratio is to acreage within each product type for all growing methods (table 3.7).

Table 3.9 Fresh tomatoes: U.S. producers' using open field growing methods' assigned acreage, by product type and period

Quantity in acres; Share in percent; Change in percent for quantity lines and change in percentage points for share and ratio lines

Product type	Measure	2019	2023	2024	2025	2019-2025 Change
Fresh tomatoes only	Quantity	***	***	***	***	▲ ***
Fresh tomatoes and other crops	Quantity	***	***	***	***	▲ ***
Other crops only	Quantity	***	***	***	***	▲ ***
Left fallow	Quantity	***	***	***	***	▲ ***
Total acreage	Quantity	***	***	***	***	▲ ***
Fresh tomatoes only	Share	***	***	***	***	▼ ***
Fresh tomatoes and other crops	Share	***	***	***	***	▲ ***
Other crops only	Share	***	***	***	***	▲ ***
Left fallow	Share	***	***	***	***	▲ ***
Total acreage	Share	100.0	100.0	100.0	100.0	—
Fresh tomatoes only	Ratio	***	***	***	***	▼ ***
Fresh tomatoes and other crops	Ratio	***	***	***	***	▲ ***
Other crops only	Ratio	***	***	***	***	▲ ***
Left fallow	Ratio	***	***	***	***	▲ ***
Total acreage	Ratio	***	***	***	***	▲ ***

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "—". Ratio is to acreage within each product type for all growing methods (table 3.7).

Table 3.10 Fresh tomatoes: U.S. producers' harvesting related production activities, by growing method and period

Quantity in 1,000 pounds; Yield in pounds per acre; Share in percent; Change in percent for quantity and yield lines and change in percentage points for share lines

Growing method	Measure	Product type	2019	2023	2024	2025	2019-2025 Change
Hydroponic	Quantity	Fresh tomatoes	***	***	***	***	▲ ***
Hydroponic	Quantity	Other crops	***	***	***	***	▼ ***
Hydroponic	Quantity	All crops	***	***	***	***	▲ ***
Hydroponic	Share	Fresh tomatoes	***	***	***	***	▲ ***
Hydroponic	Share	Other crops	***	***	***	***	▼ ***
Hydroponic	Share	All crops	100.0	100.0	100.0	100.0	***
Hydroponic	Yield	Fresh tomatoes	***	***	***	***	▲ ***
Hydroponic	Yield	Other crops	***	***	***	***	▼ ***
Hydroponic	Yield	All crops	***	***	***	***	▲ ***
Protected	Quantity	Fresh tomatoes	***	***	***	***	▼ ***
Protected	Quantity	Other crops	***	***	***	***	▲ ***
Protected	Quantity	All crops	***	***	***	***	▼ ***
Protected	Share	Fresh tomatoes	***	***	***	***	▼ ***
Protected	Share	Other crops	***	***	***	***	▲ ***
Protected	Share	All crops	100.0	100.0	100.0	100.0	***
Protected	Yield	Fresh tomatoes	***	***	***	***	▼ ***
Protected	Yield	Other crops	***	***	***	***	▲ ***
Protected	Yield	All crops	***	***	***	***	▼ ***

Table continued

Table 3.10 Fresh tomatoes (continued): U.S. producers' harvesting related production activities, by growing method and period

Quantity in 1,000 pounds; Share in percent; Change in percent for quantity and yield lines and change in percentage points for share lines

Growing method	Measure	Product type	2019	2023	2024	2025	2019-2025 Change
Open	Quantity	Fresh tomatoes	***	***	***	***	▼***
Open	Quantity	Other crops	***	***	***	***	▲***
Open	Quantity	All crops	***	***	***	***	▲***
Open	Share	Fresh tomatoes	***	***	***	***	▼***
Open	Share	Other crops	***	***	***	***	▲***
Open	Share	All crops	100.0	100.0	100.0	100.0	***
Open	Yield	Fresh tomatoes	***	***	***	***	▼***
Open	Yield	Other crops	***	***	***	***	▼***
Open	Yield	All crops	***	***	***	***	▼***
All methods	Quantity	Fresh tomatoes	1,300,018	1,275,049	1,315,039	1,430,963	▲10.1
All methods	Quantity	Other crops	95,200	100,301	107,079	104,626	▲9.9
All methods	Quantity	All crops	1,395,218	1,375,351	1,422,118	1,535,589	▲10.1
All methods	Share	Fresh tomatoes	93.2	92.7	92.5	93.2	▲0.0
All methods	Share	Other crops	6.8	7.3	7.5	6.8	▼(0.0)
All methods	Share	All crops	100.0	100.0	100.0	100.0	—
All methods	Yield	Fresh tomatoes	54,531	38,595	35,971	39,825	▼(27.0)
All methods	Yield	Other crops	27,691	6,853	6,351	6,436	▼(76.8)
All methods	Yield	All crops	51,692	32,536	30,746	32,770	▼(36.6)

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "—". Controlled environment hydroponic producers reported a large portion of their acreage fallow in 2019, which resulted in the lower yield calculation in 2019 in aggregate across all products, compared to the tomatoes and other crop yields. The protected culture producer ***. Finally, across all methods, one major U.S. producer *** reported both dual use and fallow acreage in the 2023-25 period that was not so reported in their 2019 numbers, resulting in the reported declines in yields comparing 2019 and 2025.

Table 3.11 Fresh tomatoes: U.S. producers' packing related production activities, by product type, by growing method and period

Quantity in 1,000 pounds; Share in percent; Change in percent for quantity and yield lines and change in percentage points for share lines

Growing method	Measure	Product type	2019	2023	2024	2025	2019-2025 Change
Hydroponic	Quantity	Domestic: Own operations	***	***	***	***	▲ ***
Hydroponic	Quantity	Domestic: Affiliated operations	***	***	***	***	▲ ***
Hydroponic	Quantity	Domestic	***	***	***	***	▲ ***
Hydroponic	Quantity	Imported	***	***	***	***	▼ ***
Hydroponic	Quantity	All fresh tomatoes	***	***	***	***	▲ ***
Hydroponic	Quantity	Other crops	***	***	***	***	▼ ***
Hydroponic	Quantity	All crops	***	***	***	***	▲ ***
Hydroponic	Share	Domestic: Own operations	***	***	***	***	▲ ***
Hydroponic	Share	Domestic: Affiliated operations	***	***	***	***	▲ ***
Hydroponic	Share	Domestic	***	***	***	***	▲ ***
Hydroponic	Share	Imported	***	***	***	***	▼ ***
Hydroponic	Share	All fresh tomatoes	***	***	***	***	▲ ***
Hydroponic	Share	Other crops	***	***	***	***	▼ ***
Hydroponic	Share	All crops	100.0	100.0	100.0	100.0	—

Table continued

Table 3.11 Fresh tomatoes (Continued): U.S. producers' packing related production activities, by product type, by growing method and period

Quantity in 1,000 pounds; Share in percent; Change in percent for quantity and yield lines and change in percentage points for share lines

Growing method	Measure	Product type	2019	2023	2024	2025	2019-2025 Change
Protected	Quantity	Domestic: Own operations	***	***	***	***	▼ ***
Protected	Quantity	Domestic: Affiliated operations	***	***	***	***	***
Protected	Quantity	Domestic	***	***	***	***	▼ ***
Protected	Quantity	Imported	***	***	***	***	***
Protected	Quantity	All fresh tomatoes	***	***	***	***	▼ ***
Protected	Quantity	Other crops	***	***	***	***	▲ ***
Protected	Quantity	All crops	***	***	***	***	▼ ***
Protected	Share	Domestic: Own operations	***	***	***	***	▼ ***
Protected	Share	Domestic: Affiliated operations	***	***	***	***	***
Protected	Share	Domestic	***	***	***	***	▼ ***
Protected	Share	Imported	***	***	***	***	***
Protected	Share	All fresh tomatoes	***	***	***	***	▼ ***
Protected	Share	Other crops	***	***	***	***	▲ ***
Protected	Share	All crops	100.0	100.0	100.0	100.0	—

Table continued

Table 3.11 Fresh tomatoes (Continued): U.S. producers' packing related production activities, by product type, by growing method and period

Quantity in 1,000 pounds; Share in percent; Change in percent for quantity and yield lines and change in percentage points for share lines

Grow- ing method	Measure	Product type	2019	2023	2024	2025	2019-2025 Change
Open	Quantity	Domestic: Own operations	***	***	***	***	▼ ***
Open	Quantity	Domestic: Affiliated operations	***	***	***	***	***
Open	Quantity	Domestic	***	***	***	***	▼ ***
Open	Quantity	Imported	***	***	***	***	***
Open	Quantity	All fresh tomatoes	***	***	***	***	▼ ***
Open	Quantity	Other crops	***	***	***	***	▼ ***
Open	Quantity	All crops	***	***	***	***	▼ ***
Open	Share	Domestic: Own operations	***	***	***	***	▲ ***
Open	Share	Domestic: Affiliated operations	***	***	***	***	***
Open	Share	Domestic	***	***	***	***	▲ ***
Open	Share	Imported	***	***	***	***	***
Open	Share	All fresh tomatoes	***	***	***	***	▲ ***
Open	Share	Other crops	***	***	***	***	▼ ***
Open	Share	All crops	100.0	100.0	100.0	100.0	—

Table continued

Table 3.11 Fresh tomatoes (Continued): U.S. producers' packing related production activities, by product type, by growing method and period

Quantity in 1,000 pounds; Share in percent; Change in percent for quantity and yield lines and change in percentage points for share lines

Grow-ing method	Measure	Product type	2019	2023	2024	2025	2019- 2025 Change
All methods	Quantity	Domestic: Own operations	***	***	***	***	▲ ***
All methods	Quantity	Domestic: Affiliated operations	***	***	***	***	▲ ***
All methods	Quantity	Domestic	1,222,312	1,210,196	1,241,309	1,335,890	▲ 9.3
All methods	Quantity	Imported	8,010	10,879	10,798	6,798	▼ (15.1)
All methods	Quantity	All fresh tomatoes	1,230,323	1,221,075	1,252,106	1,342,689	▲ 9.1
All methods	Quantity	Other crops	39,411	34,790	24,028	24,710	▼ (37.3)
All methods	Quantity	All crops	1,269,734	1,255,865	1,276,134	1,367,398	▲ 7.7
All methods	Share	Domestic: Own operations	***	***	***	***	▲ ***
All methods	Share	Domestic: Affiliated operations	***	***	***	***	▲ ***
All methods	Share	Domestic	96.3	96.4	97.3	97.7	▲ 1.4
All methods	Share	Imported	0.6	0.9	0.8	0.5	▼ (0.1)
All methods	Share	All fresh tomatoes	96.9	97.2	98.1	98.2	▲ 1.3
All methods	Share	Other crops	3.1	2.8	1.9	1.8	▼ (1.3)
All methods	Share	All crops	100.0	100.0	100.0	100.0	—

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "—".

Table 3.12 presents U.S. producers' production by source of tomatoes and period.

Table 3.12 Fresh tomatoes: U.S. producers' production, by source of tomatoes and period

Quantity in acres; share in percent; Change in percent for quantity lines and change in percentage points for share lines

Source of fresh tomatoes	Measure	2019	2023	2024	2025	2019-2025 Change
Production using own tomatoes	Quantity	***	***	***	***	▲ ***
Production using related firms data	Quantity	***	***	***	***	***
Production using unrelated firms data	Quantity	***	***	***	***	▲ ***
All production	Quantity	1,226,638	1,226,459	1,254,353	1,356,683	▲ 10.6
Production using own tomatoes	Share	***	***	***	***	***
Production using related firms data	Share	***	***	***	***	***
Production using unrelated firms data	Share	***	***	***	***	***
All production	Share	100.0	100.0	100.0	100.0	***

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "—".

U.S. producers' U.S. shipments and exports

Tables 3.13 (total shipments), 3.14 (shipments based on growing method), 3.15 (varietal), 3.16 (by packaging type), and 3.17 (by picking method)³ present U.S. producers' U.S. shipments, export shipments, and total shipments.

Table 3.13 Fresh tomatoes: U.S. producers' total shipments, by destination and period

Quantity in 1,000 pounds; value in 1,000 dollars; unit value in dollars per pound; shares in percent

Item	Measure	2019	2023	2024	2025	2019-2025 Change
U.S. shipments	Quantity	1,200,300	1,199,214	1,224,312	1,326,760	▲10.5
Export shipments	Quantity	26,115	26,846	28,792	29,747	▲13.9
Total shipments	Quantity	1,226,414	1,226,060	1,253,104	1,356,506	▲10.6
U.S. shipments	Value	697,132	785,122	1,063,082	860,118	▲23.4
Export shipments	Value	19,043	18,035	25,456	16,953	▼(11.0)
Total shipments	Value	716,175	803,157	1,088,538	877,071	▲22.5
U.S. shipments	Unit value	0.58	0.65	0.87	0.65	▲11.6
Export shipments	Unit value	0.73	0.67	0.88	0.57	▼(21.8)
Total shipments	Unit value	0.58	0.66	0.87	0.65	▲10.7
U.S. shipments	Share of quantity	97.9	97.8	97.7	97.8	▼(0.1)
Export shipments	Share of quantity	2.1	2.2	2.3	2.2	▲0.1
Total shipments	Share of quantity	100.0	100.0	100.0	100.0	—
U.S. shipments	Share of value	97.3	97.8	97.7	98.1	▲0.7
Export shipments	Share of value	2.7	2.2	2.3	1.9	▼(0.7)
Total shipments	Share of value	100.0	100.0	100.0	100.0	—

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "—".

³ U.S. producer ***.

Table 3.14 Fresh tomatoes: U.S. producers' U.S. shipments, by growing method and period

Quantity in 1,000 pounds; value in 1,000 dollars; unit value in dollars per pound; shares in percent

Growing method	Measure	2019	2025	2019-2025 Change
Hydroponic	Quantity	***	***	▲ ***
Protected	Quantity	***	***	▼ ***
Open	Quantity	***	***	▼ ***
All growing methods	Quantity	1,200,300	1,326,760	▲ 10.5
Hydroponic	Value	***	***	▲ ***
Protected	Value	***	***	▼ ***
Open	Value	***	***	▼ ***
All growing methods	Value	697,132	860,118	▲ 23.4
Hydroponic	Unit value	***	***	▼ ***
Protected	Unit value	***	***	▼ ***
Open	Unit value	***	***	▲ ***
All growing methods	Unit value	0.58	0.65	▲ 11.6
Hydroponic	Share of quantity	***	***	▲ ***
Protected	Share of quantity	***	***	▼ ***
Open	Share of quantity	***	***	▼ ***
All growing methods	Share of quantity	100.0	100.0	—
Hydroponic	Share of value	***	***	▲ ***
Protected	Share of value	***	***	▼ ***
Open	Share of value	***	***	▼ ***
All growing methods	Share of value	100.0	100.0	—

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "—".

Table 3.15 Fresh tomatoes: U.S. producers' U.S. shipments, by varietal and period

Quantity in 1,000 pounds; value in 1,000 dollars; unit value in dollars per pound; shares in percent

Varietal type	Measure	2019	2025	2019-2025 Change
Round	Quantity	***	***	▲ ***
Plum/Roma	Quantity	***	***	▲ ***
Cherry/Grape	Quantity	***	***	▼ ***
Other varieties	Quantity	***	***	▲ ***
All varieties	Quantity	1,200,300	1,326,760	▲ 10.5
Round	Share	***	***	▼ ***
Plum/Roma	Share	***	***	▲ ***
Cherry/Grape	Share	***	***	▼ ***
Other varieties	Share	***	***	▲ ***
All varieties	Share	100.0	100.0	—

Source: Compiled from data submitted in response to Commission questionnaires.

Table 3.16 Fresh tomatoes: U.S. producers' U.S. shipments, by packaging type and period

Quantity in 1,000 pounds; value in 1,000 dollars; unit value in dollars per pound; shares in percent

Packaging type	Measure	2019	2025	2019-2025 Change
Bulk	Quantity	***	***	▲ ***
Clam shells	Quantity	***	***	▲ ***
Trays	Quantity	***	***	▲ ***
Other packaging	Quantity	***	***	▼ ***
All packaging types	Quantity	1,200,300	1,326,760	▲ 10.5
Bulk	Share	***	***	▼ ***
Clam shells	Share	***	***	▲ ***
Trays	Share	***	***	▲ ***
Other packaging	Share	***	***	▼ ***
All packaging types	Share	100.0	100.0	—

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "—".

Table 3.17 Fresh tomatoes: U.S. producers' U.S. shipments, by picking method and period

Quantity in 1,000 pounds; value in 1,000 dollars; unit value in dollars per pound; shares in percent

Picking method	Measure	2019	2025	2019-2025 Change
Vine ripe	Quantity	***	***	▲ ***
Mature green	Quantity	***	***	▲ ***
All picking methods	Quantity	1,200,300	1,326,760	▲ 10.5
Vine ripe	Value	***	***	▲ ***
Mature green	Value	***	***	▲ ***
All picking methods	Value	697,132	860,118	▲ 23.4
Vine ripe	Unit value	***	***	▲ ***
Mature green	Unit value	***	***	▼ ***
All types	Unit value	0.58	0.65	▲ 11.6
Vine ripe	Share of Quantity	***	***	▲ ***
Mature green	Share of Quantity	***	***	▼ ***
All picking methods	Share of Quantity	100.0	100.0	—
Vine ripe	Share of Value	***	***	▲ ***
Mature green	Share of Value	***	***	▼ ***
All picking methods	Share of Value	100.0	100.0	—

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "—".

U.S. producers' inventories

Table 3.18 presents U.S. producers' end-of-period inventories and the ratio of these inventories to U.S. producers' production, U.S. shipments, and total shipments. End-of-period inventories were higher in 2025 than in 2019. However, in no year were such inventories equivalent to more than 0.1 percent of U.S. production, U.S. shipments, or total shipments. *** accounted for the vast majority of end-of-period inventories during 2025.

Table 3.18 Fresh tomatoes: U.S. producers' inventories and their ratio to select items, by period

Quantity in 1,000 pounds; ratios are inventories to production and shipments

Item	Measure	2019	2023	2024	2025	2019-2025 Change
End-of-period inventory	Quantity	***	***	***	***	▲ ***
Inventory to U.S. production	Ratio	***	***	***	***	▲ ***
Inventory to U.S. shipments	Ratio	***	***	***	***	▲ ***
Inventory to total shipments	Ratio	***	***	***	***	▲ ***

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "—".

U.S. producers' imports from subject sources

U.S. producers' imports of fresh tomatoes are presented in table 3.19 for U.S. producer ***, table 3.20 for U.S. producer ***, table 3.21 for U.S. producer ***, table 3.22 for ***, table 3.23 for ***, table 3.24 for ***, and table 3.25 for ***. Table 3.26 presents the reasons for U.S. producers' subject imports.

Table 3.19 Fresh tomatoes: * U.S. production, its affiliates' *** subject imports, and ratio of subject imports to production, by source and period**

Quantity in 1,000s of pounds; ratio in percent

Item	Measure	2019	2023	2024	2025	2019-2025 Change
U.S. production	Quantity	***	***	***	***	▼ ***
Imports from Mexico	Quantity	***	***	***	***	▲ ***
Imports from Mexico to U.S. production	Ratio	***	***	***	***	▲ ***

Source: Compiled from data submitted in response to Commission questionnaires.

Table 3.20 Fresh tomatoes: * U.S. production, its affiliates' *** subject imports, and ratio of subject imports to production, by source and period**

Quantity in 1,000 pounds; ratio in percent

Item	Measure	2019	2023	2024	2025	2019-2025 Change
U.S. production	Quantity	***	***	***	***	▼ ***
Imports from Mexico by affiliated importer ***	Quantity	***	***	***	***	▲ ***
Imports from Mexico by affiliated importer ***	Quantity	***	***	***	***	▼ ***
Imports from Mexico	Quantity	***	***	***	***	***
Imports from Mexico by affiliated importer *** to U.S. production	Ratio	***	***	***	***	▲ ***
Imports from Mexico by affiliated importer *** to U.S. production	Ratio	***	***	***	***	▼ ***
Imports from Mexico to U.S. production	Ratio	***	***	***	***	▲ ***

Source: Compiled from data submitted in response to Commission questionnaires.

Table 3.21 Fresh tomatoes: * U.S. production, its affiliates' *** subject imports, and ratio of subject imports to production, by source and period**

Quantity in 1,000 pounds; ratio in percent

Item	Measure	2019	2023	2024	2025	2019-2025 Change
U.S. production	Quantity	***	***	***	***	▼ ***
Imports from Mexico	Quantity	***	***	***	***	▲ ***
Imports from Mexico to U.S. production	Ratio	***	***	***	***	▲ ***

Source: Compiled from data submitted in response to Commission questionnaires.

Table 3.22 Fresh tomatoes: * U.S. production, its affiliate's *** subject imports, and ratio of subject imports to production, by source and period**

Quantity in 1,000 pounds; ratio in percent

Item	Measure	2019	2023	2024	2025	2019-2025 Change
U.S. production	Quantity	***	***	***	***	▲ ***
Imports from Mexico	Quantity	***	***	***	***	▼ ***
Imports from Mexico to U.S. production	Ratio	***	***	***	***	▼ ***

Source: Compiled from data submitted in response to Commission questionnaires.

Table 3.23 Fresh tomatoes: * U.S. production, its affiliate's *** subject imports, and ratio of subject imports to production, by source and period**

Quantity in 1,000 pounds; ratio in percent

Item	Measure	2019	2023	2024	2025	2019-2025 Change
U.S. production	Quantity	***	***	***	***	▲ ***
Imports from Mexico	Quantity	***	***	***	***	▼ ***
Imports from Mexico to U.S. production	Ratio	***	***	***	***	▼ ***

Source: Compiled from data submitted in response to Commission questionnaires.

Table 3.24 Fresh tomatoes: * U.S. production, its affiliate's *** subject imports, and ratio of subject imports to production, by source and period**

Quantity in 1,000 pounds; ratio in percent

Item	Measure	2019	2023	2024	2025	2019-2025 Change
U.S. production	Quantity	***	***	***	***	▼ ***
Imports from Mexico	Quantity	***	***	***	***	***
Imports from Mexico to U.S. production	Ratio	***	***	***	***	***

Source: Compiled from data submitted in response to Commission questionnaires.

Table 3.25 Fresh tomatoes: * U.S. production, its affiliate's *** subject imports, and ratio of subject imports to production, by source and period**

Quantity in 1,000 pounds; ratio in percent

Item	Measure	2019	2023	2024	2025	2019-2025 Change
U.S. production	Quantity	***	***	***	***	▲ ***
Imports from Mexico	Quantity	***	***	***	***	▲ ***
Imports from Mexico to U.S. production	Ratio	***	***	***	***	▲ ***

Source: Compiled from data submitted in response to Commission questionnaires.

Table 3.26 Fresh tomatoes: U.S. producers' affiliated importers' reasons for importing

Item	Narrative response on reason(s) for importation
***'s reason for importing	***
***'s reason for importing	***
***'s reason for importing	***
***'s reason for importing	***
***'s reason for importing	***
***'s reason for importing	***
***'s reason for importing	***
***'s reason for importing	***

Source: Compiled from data submitted in response to Commission questionnaires.

U.S. producers' purchases of imports from subject sources

U.S. producer *** reported purchases of fresh tomatoes during 2019 and 2023 through 2025. ***. *** indicated its reason for purchasing imports from the subject country was “we were out of season and had no production to sell.”⁴

⁴ *** U.S. producer questionnaire response, section II-13.

U.S. employment, wages, and productivity

Table 3.27 shows U.S. producers' employment-related data.⁵ The employment data for U.S. producers of fresh tomatoes were generally higher in 2025 than in 2019, with the exception of total hours worked and hours per production related worker ("PRW"). However, the growth in hourly wages outstripped the growth in productivity, resulting in higher unit labor costs. At the Commission's hearing, A witness for Mastronardi reported facing constraints finding skilled workers for greenhouse operations in the United States, and stated that seasonal or temporary workers (H2A guest worker program) were not sufficiently available to alleviate that constraint.⁶ Seasonal PRWs accounted for a slight majority of all such worker from 2023 to 2025, in contrast to 2019, when permanent PRW represented a slight majority.

Table 3.27 Fresh tomatoes: U.S. producers' employment related information, by period

Item	2019	2023	2024	2025	2019-2025 Change
Permanent production and related workers (PRWs) (number)	***	***	***	***	▲ ***
Seasonal production and related workers (PRWs) (number)	***	***	***	***	▲ ***
All production and related workers (PRWs) (number)	10,059	11,215	10,681	11,089	▲ 10.2
Total hours worked (1,000 hours)	9,821	9,346	9,003	9,536	▼ (2.9)
Hours worked per PRW (hours)	976	833	843	860	▼ (11.9)
Wages paid (\$1,000)	134,063	154,212	156,424	168,358	▲ 25.6
Hourly wages (dollars per hour)	\$13.65	\$16.50	\$17.38	\$17.65	▲ 29.3
Productivity (pounds per hour)	125	131	139	142	▲ 13.9
Unit labor costs (dollars per pound)	\$0.11	\$0.13	\$0.12	\$0.12	▲ 13.5

Source: Compiled from data submitted in response to Commission questionnaires.

⁵ *** accounted for nearly two-thirds of permanent PRWs during 2025, while *** accounted for more than half of the seasonal PRWs during 2025.

⁶ Hearing transcript, p. 41 (Einsteadig).

Financial experience of U.S. producers

Background⁶

As discussed earlier in this chapter, all responding firms confirmed production of fresh tomatoes in the United States by responding to the Commission's questionnaire. Of these firms, *** reported usable financial data. *** U.S. producers reported financial data on a calendar year basis, and *** use accounting systems based on U.S. GAAP for their overall financial reporting.^{7 8}

The four largest U.S. producers (***) accounted for almost four-fifths of total sales quantity in 2025.⁹ Approximately, half of the responding U.S. producers reported using an open field to grow fresh tomatoes while the other half used controlled environments.¹⁰ The majority of the responding U.S. producers reported tomatoes as the only crop grown in their farms.

Figure 3.3 presents each responding firm's share of the total reported net sales quantity in 2025.

⁶ The following abbreviations are used in the tables and/or text of this section: generally accepted accounting principles ("GAAP"), accounting standards for private enterprises ("ASPE") a set of accounting standards available for private companies in Canada, fiscal year ("FY"), net sales ("NS"), cost of goods sold ("COGS"), selling, general, and administrative expenses ("SG&A expenses"), average unit values ("AUVs"), research and development ("R&D"), and return on assets ("ROA").

⁷ *** reported their financial results on the basis of a fiscal year that ends on July 31.

⁸ *** reported data on a tax cash basis, *** reported data on the basis of ASPE, and *** did not identify its primary accounting basis.

⁹ One U.S. producer ***.

¹⁰ U.S. producers' questionnaire response, sections 1.2a, 2.2e, and 2.2d.

Figure 3.3 Fresh tomatoes: U.S. producers' share of net sales quantity in 2025, by firm

* * * * *

Source: Compiled from data submitted in response to Commission questionnaires.

Operations on fresh tomatoes

Table 3.28 presents aggregated data on U.S. producers' operations in relation to fresh tomatoes, while table 3.29 presents corresponding changes in AUVs. Table 3.30 presents selected company-specific financial data.

Table 3.28 Fresh tomatoes: U.S. producers' results of operations, by item and period

Quantity in 1,000 pounds; value in 1,000 dollars; ratios in percent, change in percent for quantity and value lines; change in percentage points for ratio lines

Item	Measure	2019	2023	2024	2025	2019 to 2025 change
Total net sales	Quantity	1,189,646	1,170,010	1,231,596	1,301,569	▲9.4
Total net sales	Value	669,587	746,096	1,050,001	820,441	▲22.5
COGS: Raw materials	Value	218,488	283,433	320,384	351,176	▲60.7
COGS: Direct labor	Value	211,537	239,811	274,818	292,543	▲38.3
COGS: Other factory	Value	101,395	140,657	152,321	173,889	▲71.5
COGS: Total	Value	531,421	663,901	747,524	817,608	▲53.9
Gross profit or (loss)	Value	138,166	82,195	302,478	2,833	▼(97.9)
SG&A expenses	Value	49,820	68,643	91,658	83,943	▲68.5
Operating income or (loss)	Value	88,346	13,552	210,820	(81,110)	▼—
All other expense/(income)	Value	(16,562)	(64,448)	19,086	(38,562)	▼—
Net income or (loss)	Value	104,908	78,000	191,734	(42,549)	▼—
Depreciation/amortization	Value	32,063	45,796	49,328	54,903	▲71.2
Cash flow	Value	136,971	123,796	241,062	12,355	▼(91.0)
COGS: Raw materials	Ratio to NS	32.6	38.0	30.5	42.8	▲10.2
COGS: Direct labor	Ratio to NS	31.6	32.1	26.2	35.7	▲4.1
COGS: Other factory	Ratio to NS	15.1	18.9	14.5	21.2	▲6.1
COGS: Total	Ratio to NS	79.4	89.0	71.2	99.7	▲20.3
Gross profit	Ratio to NS	20.6	11.0	28.8	0.3	▼(20.3)
SG&A expense	Ratio to NS	7.4	9.2	8.7	10.2	▲2.8
Operating income or (loss)	Ratio to NS	13.2	1.8	20.1	(9.9)	▼(23.1)
Net income or (loss)	Ratio to NS	15.7	10.5	18.3	(5.2)	▼(20.9)

Table continued.

Table 3.28 (Continued) Fresh tomatoes: U.S. producers' results of operations, by item and period

Shares in percent; unit values in dollars per pound; count in number of firms reporting; change in percent for unit value lines; change in percentage points for share lines

Item	Measure	2019	2023	2024	2025	2019 to 2025 change
COGS: Raw materials	Share	41.1	42.7	42.9	43.0	▲ 1.8
COGS: Direct labor	Share	39.8	36.1	36.8	35.8	▼ (4.0)
COGS: Other factory	Share	19.1	21.2	20.4	21.3	▲ 2.2
COGS: Total	Share	100.0	100.0	100.0	100.0	—
Total net sales	Unit value	0.56	0.64	0.85	0.63	▲ 12.0
COGS: Raw materials	Unit value	0.18	0.24	0.26	0.27	▲ 46.9
COGS: Direct labor	Unit value	0.18	0.20	0.22	0.22	▲ 26.4
COGS: Other factory	Unit value	0.09	0.12	0.12	0.13	▲ 56.7
COGS: Total	Unit value	0.45	0.57	0.61	0.63	▲ 40.6
Gross profit or (loss)	Unit value	0.12	0.07	0.25	0.00	▼ (98.1)
SG&A expenses	Unit value	0.04	0.06	0.07	0.06	▲ 54.0
Operating income or (loss)	Unit value	0.07	0.01	0.17	(0.06)	▼ —
Net income or (loss)	Unit value	0.09	0.07	0.16	(0.03)	▼ —
Operating losses	Count	4	5	3	11	—
Net losses	Count	3	5	4	11	—
Data	Count	15	14	15	15	—

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Shares represent the share of COGS. Zeroes, null values, and undefined calculations are suppressed and shown as “—”. Percent changes only calculated when both comparison values are positive. Only directional change provided when one or both comparison values represent loss.”

Table 3.29 Fresh tomatoes: Changes in AUVs between comparison periods

Changes in percent

Item	2023 to 2025	2023 to 2024	2024 to 2025	2019 to 2025 change
Total net sales	▼(1.2)	▲33.7	▼(26.1)	▲12.0
COGS: Raw materials	▲11.4	▲7.4	▲3.7	▲46.9
COGS: Direct labor	▲9.7	▲8.9	▲0.7	▲26.4
COGS: Other factory	▲11.1	▲2.9	▲8.0	▲56.7
COGS: Total	▲10.7	▲7.0	▲3.5	▲40.6

Table continued.

Table 3.29 (Continued) Fresh tomatoes: Changes in AUVs between comparison periods

Changes in dollars per pound

Item	2023 to 2025	2023 to 2024	2024 to 2025	2019 to 2025 change
Total net sales	▼(0.01)	▲0.21	▼(0.22)	▲0.07
COGS: Raw materials	▲0.03	▲0.02	▲0.01	▲0.09
COGS: Direct labor	▲0.02	▲0.02	▲0.00	▲0.05
COGS: Other factory	▲0.01	▲0.00	▲0.01	▲0.05
COGS: Total	▲0.06	▲0.04	▲0.02	▲0.18
Gross profit or (loss)	▼(0.07)	▲0.18	▼(0.24)	▼(0.11)
SG&A expense	▲0.01	▲0.02	▼(0.01)	▲0.02
Operating income or (loss)	▼(0.07)	▲0.16	▼(0.23)	▼(0.14)
Net income or (loss)	▼(0.10)	▲0.09	▼(0.19)	▼(0.12)

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Percentages and unit values shown as “0.0” or “0.00” represent values greater than zero, but less than “0.05” or “0.005,” respectively. Zeroes, null values, and undefined calculations are suppressed and shown as “—”. Period changes preceded by a “▲” represent an increase, while period changes preceded by a “▼” represent a decrease.

Table 3.30 Fresh tomatoes: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Net sales quantity

Quantity in 1,000 pounds; change in percent

Firm	2019	2023	2024	2025	2019 to 2025 Change
DiMare Enterprises	***	***	***	***	▼ ***
DiMare Homestead	***	***	***	***	▲ ***
Gargiulo	***	***	***	***	▼ ***
Leitz Farms	***	***	***	***	▲ ***
Lipman Family Farms	***	***	***	***	▼ ***
Mastronardi Produce	***	***	***	***	▲ ***
NatureSweet USA	***	***	***	***	▼ ***
Pacific Tomato Growers	***	***	***	***	▲ ***
Pure Flavor	***	***	***	***	▲ ***
Red Sun Farms	***	***	***	***	▲ ***
Smith Tomato	***	***	***	***	▼ ***
TLC Farms	***	***	***	***	***
Viereck Farms	***	***	***	***	▼ ***
West Coast Tomato	***	***	***	***	▼ ***
West Coast Tomato Growers	***	***	***	***	▼ ***
Windset Farms	***	***	***	***	***
All firms	1,189,646	1,170,010	1,231,596	1,301,569	▲ 9.4

Table continued.

Table 3.30 (Continued) Fresh tomatoes: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Net sales value

Value in 1,000 dollars; change in percent

Firm	2019	2023	2024	2025	2019 to 2025 Change
,	***	***	***	***	▼ ***
DiMare Homestead	***	***	***	***	▼ ***
Gargiulo	***	***	***	***	▼ ***
Leitz Farms	***	***	***	***	▲ ***
Lipman Family Farms	***	***	***	***	▲ ***
Mastronardi Produce	***	***	***	***	▲ ***
NatureSweet USA	***	***	***	***	▼ ***
Pacific Tomato Growers	***	***	***	***	▲ ***
Pure Flavor	***	***	***	***	▲ ***
Red Sun Farms	***	***	***	***	▲ ***
Smith Tomato	***	***	***	***	▼ ***
TLC Farms	***	***	***	***	▲ ***
Viereck Farms	***	***	***	***	▼ ***
West Coast Tomato	***	***	***	***	▼ ***
West Coast Tomato Growers	***	***	***	***	▼ ***
Windset Farms	***	***	***	***	***
All firms	669,587	746,096	1,050,001	820,441	▲ 22.5

Table continued.

Table 3.30 (Continued) Fresh tomatoes: U.S. producers' sales, costs/expenses, and profitability, by firm and period

COGS

Value in 1,000 dollars; change in percent

Firm	2019	2023	2024	2025	2019 to 2025 Change
DiMare Enterprises	***	***	***	***	▼ ***
DiMare Homestead	***	***	***	***	▲ ***
Gargiulo	***	***	***	***	▲ ***
Leitz Farms	***	***	***	***	▲ ***
Lipman Family Farms	***	***	***	***	▲ ***
Mastronardi Produce	***	***	***	***	▲ ***
NatureSweet USA	***	***	***	***	▼ ***
Pacific Tomato Growers	***	***	***	***	▲ ***
Pure Flavor	***	***	***	***	▲ ***
Red Sun Farms	***	***	***	***	▲ ***
Smith Tomato	***	***	***	***	▼ ***
TLC Farms	***	***	***	***	▲ ***
Viereck Farms	***	***	***	***	▼ ***
West Coast Tomato	***	***	***	***	▼ ***
West Coast Tomato Growers	***	***	***	***	▼ ***
Windset Farms	***	***	***	***	***
All firms	531,421	663,901	747,524	817,608	▲ 53.9

Table continued.

Table 3.30 (Continued) Fresh tomatoes: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Gross profit or (loss)

Value in 1,000 dollars; change in percent

Firm	2019	2023	2024	2025	2019 to 2025 Change
DiMare Enterprises	***	***	***	***	▼ ***
DiMare Homestead	***	***	***	***	▼ ***
Gargiulo	***	***	***	***	▼ ***
Leitz Farms	***	***	***	***	▼ ***
Lipman Family Farms	***	***	***	***	▼ ***
Mastronardi Produce	***	***	***	***	▲ ***
NatureSweet USA	***	***	***	***	▼ ***
Pacific Tomato Growers	***	***	***	***	▲ ***
Pure Flavor	***	***	***	***	▲ ***
Red Sun Farms	***	***	***	***	▼ ***
Smith Tomato	***	***	***	***	▼ ***
TLC Farms	***	***	***	***	▲ ***
Viereck Farms	***	***	***	***	▼ ***
West Coast Tomato	***	***	***	***	▼ ***
West Coast Tomato Growers	***	***	***	***	▼ ***
Windset Farms	***	***	***	***	***
All firms	138,166	82,195	302,478	2,833	▼ (97.9)

Table continued.

Table 3.30 (Continued) Fresh tomatoes: U.S. producers' sales, costs/expenses, and profitability, by firm and period

SG&A expenses

Value in 1,000 dollars; change in percent

Firm	2019	2023	2024	2025	2019 to 2025 Change
DiMare Enterprises	***	***	***	***	▼ ***
DiMare Homestead	***	***	***	***	▼ ***
Gargiulo	***	***	***	***	▼ ***
Leitz Farms	***	***	***	***	▼ ***
Lipman Family Farms	***	***	***	***	▲ ***
Mastronardi Produce	***	***	***	***	▲ ***
NatureSweet USA	***	***	***	***	▲ ***
Pacific Tomato Growers	***	***	***	***	▲ ***
Pure Flavor	***	***	***	***	▲ ***
Red Sun Farms	***	***	***	***	▲ ***
Smith Tomato	***	***	***	***	▼ ***
TLC Farms	***	***	***	***	▲ ***
Viereck Farms	***	***	***	***	***
West Coast Tomato	***	***	***	***	▲ ***
West Coast Tomato Growers	***	***	***	***	▼ ***
Windset Farms	***	***	***	***	***
All firms	49,820	68,643	91,658	83,943	▲ 68.5

Table continued.

Table 3.30 (Continued) Fresh tomatoes: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Operating income or (loss)

Value in 1,000 dollars; change in percent

Firm	2019	2023	2024	2025	2019 to 2025 Change
DiMare Enterprises	***	***	***	***	▼ ***
DiMare Homestead	***	***	***	***	▼ ***
Gargiulo	***	***	***	***	▼ ***
Leitz Farms	***	***	***	***	▼ ***
Lipman Family Farms	***	***	***	***	▼ ***
Mastronardi Produce	***	***	***	***	▼ ***
NatureSweet USA	***	***	***	***	▼ ***
Pacific Tomato Growers	***	***	***	***	▲ ***
Pure Flavor	***	***	***	***	▲ ***
Red Sun Farms	***	***	***	***	▼ ***
Smith Tomato	***	***	***	***	▼ ***
TLC Farms	***	***	***	***	▲ ***
Viereck Farms	***	***	***	***	▼ ***
West Coast Tomato	***	***	***	***	▼ ***
West Coast Tomato Growers	***	***	***	***	▼ ***
Windset Farms	***	***	***	***	***
All firms	88,346	13,552	210,820	(81,110)	▼ —

Table continued.

Table 3.30 (Continued) Fresh tomatoes: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Net income or (loss)

Value in 1,000 dollars; change in percent

Firm	2019	2023	2024	2025	2019 to 2025 Change
DiMare Enterprises	***	***	***	***	▼ ***
DiMare Homestead	***	***	***	***	▲ ***
Gargiulo	***	***	***	***	▼ ***
Leitz Farms	***	***	***	***	▼ ***
Lipman Family Farms	***	***	***	***	▼ ***
Mastronardi Produce	***	***	***	***	▼ ***
NatureSweet USA	***	***	***	***	▼ ***
Pacific Tomato Growers	***	***	***	***	▼ ***
Pure Flavor	***	***	***	***	▼ ***
Red Sun Farms	***	***	***	***	▼ ***
Smith Tomato	***	***	***	***	▼ ***
TLC Farms	***	***	***	***	▲ ***
Viereck Farms	***	***	***	***	▼ ***
West Coast Tomato	***	***	***	***	▼ ***
West Coast Tomato Growers	***	***	***	***	▼ ***
Windset Farms	***	***	***	***	***
All firms	104,908	78,000	191,734	(42,549)	▼ —

Table continued.

Table 3.30 (Continued) Fresh tomatoes: U.S. producers' sales, costs/expenses, and profitability, by firm and period

COGS to net sales ratio

Ratios in percent; change in percentage points

Firm	2019	2023	2024	2025	2019 to 2025 Change
DiMare Enterprises	***	***	***	***	▲ ***
DiMare Homestead	***	***	***	***	▲ ***
Gargiulo	***	***	***	***	▲ ***
Leitz Farms	***	***	***	***	▲ ***
Lipman Family Farms	***	***	***	***	▲ ***
Mastronardi Produce	***	***	***	***	▲ ***
NatureSweet USA	***	***	***	***	▲ ***
Pacific Tomato Growers	***	***	***	***	▲ ***
Pure Flavor	***	***	***	***	▲ ***
Red Sun Farms	***	***	***	***	▲ ***
Smith Tomato	***	***	***	***	▲ ***
TLC Farms	***	***	***	***	▲ ***
Viereck Farms	***	***	***	***	▲ ***
West Coast Tomato	***	***	***	***	▲ ***
West Coast Tomato Growers	***	***	***	***	▲ ***
Windset Farms	***	***	***	***	***
All firms	79.4	89.0	71.2	99.7	▲ 20.3

Table continued.

Table 3.30 (Continued) Fresh tomatoes: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Gross profit or (loss) to net sales ratio

Ratios in percent; change in percentage points

Firm	2019	2023	2024	2025	2019 to 2025 Change
DiMare Enterprises	***	***	***	***	▼ ***
DiMare Homestead	***	***	***	***	▼ ***
Gargiulo	***	***	***	***	▼ ***
Leitz Farms	***	***	***	***	▼ ***
Lipman Family Farms	***	***	***	***	▼ ***
Mastronardi Produce	***	***	***	***	▼ ***
NatureSweet USA	***	***	***	***	▼ ***
Pacific Tomato Growers	***	***	***	***	▼ ***
Pure Flavor	***	***	***	***	▼ ***
Red Sun Farms	***	***	***	***	▼ ***
Smith Tomato	***	***	***	***	▼ ***
TLC Farms	***	***	***	***	▼ ***
Viereck Farms	***	***	***	***	▼ ***
West Coast Tomato	***	***	***	***	▼ ***
West Coast Tomato Growers	***	***	***	***	▼ ***
Windset Farms	***	***	***	***	***
All firms	20.6	11.0	28.8	0.3	▼ (20.3)

Table continued.

Table 3.30 (Continued) Fresh tomatoes: U.S. producers' sales, costs/expenses, and profitability, by firm and period

SG&A expenses to net sales ratio

Ratios in percent; change in percentage points

Firm	2019	2023	2024	2025	2019 to 2025 Change
DiMare Enterprises	***	***	***	***	▲ ***
DiMare Homestead	***	***	***	***	▼ ***
Gargiulo	***	***	***	***	▼ ***
Leitz Farms	***	***	***	***	▼ ***
Lipman Family Farms	***	***	***	***	▲ ***
Mastronardi Produce	***	***	***	***	▲ ***
NatureSweet USA	***	***	***	***	▲ ***
Pacific Tomato Growers	***	***	***	***	▼ ***
Pure Flavor	***	***	***	***	▼ ***
Red Sun Farms	***	***	***	***	▼ ***
Smith Tomato	***	***	***	***	▲ ***
TLC Farms	***	***	***	***	▼ ***
Viereck Farms	***	***	***	***	***
West Coast Tomato	***	***	***	***	▲ ***
West Coast Tomato Growers	***	***	***	***	▲ ***
Windset Farms	***	***	***	***	***
All firms	7.4	9.2	8.7	10.2	▲ 2.8

Table continued.

Table 3.30 (Continued) Fresh tomatoes: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Operating income or (loss) to net sales ratio

Ratios in percent; change in percentage points

Firm	2019	2023	2024	2025	2019 to 2025 Change
DiMare Enterprises	***	***	***	***	▼ ***
DiMare Homestead	***	***	***	***	▼ ***
Gargiulo	***	***	***	***	▼ ***
Leitz Farms	***	***	***	***	▼ ***
Lipman Family Farms	***	***	***	***	▼ ***
Mastronardi Produce	***	***	***	***	▼ ***
NatureSweet USA	***	***	***	***	▼ ***
Pacific Tomato Growers	***	***	***	***	▲ ***
Pure Flavor	***	***	***	***	▲ ***
Red Sun Farms	***	***	***	***	▼ ***
Smith Tomato	***	***	***	***	▼ ***
TLC Farms	***	***	***	***	▲ ***
Viereck Farms	***	***	***	***	▼ ***
West Coast Tomato	***	***	***	***	▼ ***
West Coast Tomato Growers	***	***	***	***	▼ ***
Windset Farms	***	***	***	***	***
All firms	13.2	1.8	20.1	(9.9)	▼ (23.1)

Table continued.

Table 3.30 (Continued) Fresh tomatoes: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Net income or (loss) to net sales ratio

Ratios in percent; change in percentage points

Firm	2019	2023	2024	2025	2019 to 2025 Change
DiMare Enterprises	***	***	***	***	▼ ***
DiMare Homestead	***	***	***	***	▲ ***
Gargiulo	***	***	***	***	▼ ***
Leitz Farms	***	***	***	***	▼ ***
Lipman Family Farms	***	***	***	***	▼ ***
Mastronardi Produce	***	***	***	***	▼ ***
NatureSweet USA	***	***	***	***	▼ ***
Pacific Tomato Growers	***	***	***	***	▼ ***
Pure Flavor	***	***	***	***	▲ ***
Red Sun Farms	***	***	***	***	▼ ***
Smith Tomato	***	***	***	***	▼ ***
TLC Farms	***	***	***	***	▲ ***
Viereck Farms	***	***	***	***	▼ ***
West Coast Tomato	***	***	***	***	▼ ***
West Coast Tomato Growers	***	***	***	***	▼ ***
Windset Farms	***	***	***	***	***
All firms	15.7	10.5	18.3	(5.2)	▼ (20.9)

Table continued.

Table 3.30 (Continued) Fresh tomatoes: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Unit net sales value

Unit values in dollars per pound; change in percent

Firm	2019	2023	2024	2025	2019 to 2025 Change
DiMare Enterprises	***	***	***	***	▼ ***
DiMare Homestead	***	***	***	***	▼ ***
Gargiulo	***	***	***	***	▼ ***
Leitz Farms	***	***	***	***	▼ ***
Lipman Family Farms	***	***	***	***	▲ ***
Mastronardi Produce	***	***	***	***	▼ ***
NatureSweet USA	***	***	***	***	▲ ***
Pacific Tomato Growers	***	***	***	***	▼ ***
Pure Flavor	***	***	***	***	▼ ***
Red Sun Farms	***	***	***	***	▲ ***
Smith Tomato	***	***	***	***	▲ ***
TLC Farms	***	***	***	***	▲ ***
Viereck Farms	***	***	***	***	▼ ***
West Coast Tomato	***	***	***	***	▲ ***
West Coast Tomato Growers	***	***	***	***	▲ ***
Windset Farms	***	***	***	***	***
All firms	0.56	0.64	0.85	0.63	▲ 12.0

Table continued.

Table 3.30 (Continued) Fresh tomatoes: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Unit raw material

Unit values in dollars per pound; change in percent

Firm	2019	2023	2024	2025	2019 to 2025 Change
DiMare Enterprises	***	***	***	***	▲ ***
DiMare Homestead	***	***	***	***	▲ ***
Gargiulo	***	***	***	***	▲ ***
Leitz Farms	***	***	***	***	▼ ***
Lipman Family Farms	***	***	***	***	▲ ***
Mastronardi Produce	***	***	***	***	▼ ***
NatureSweet USA	***	***	***	***	▲ ***
Pacific Tomato Growers	***	***	***	***	▼ ***
Pure Flavor	***	***	***	***	▲ ***
Red Sun Farms	***	***	***	***	▲ ***
Smith Tomato	***	***	***	***	▲ ***
TLC Farms	***	***	***	***	▲ ***
Viereck Farms	***	***	***	***	▲ ***
West Coast Tomato	***	***	***	***	▲ ***
West Coast Tomato Growers	***	***	***	***	▲ ***
Windset Farms	***	***	***	***	***
All firms	0.18	0.24	0.26	0.27	▲ 46.9

Table continued.

Table 3.30 (Continued) Fresh tomatoes: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Unit direct labor

Unit values in dollars per pound; change in percent

Firm	2019	2023	2024	2025	2019 to 2025 Change
DiMare Enterprises	***	***	***	***	▲ ***
DiMare Homestead	***	***	***	***	▲ ***
Gargiulo	***	***	***	***	▲ ***
Leitz Farms	***	***	***	***	▲ ***
Lipman Family Farms	***	***	***	***	▲ ***
Mastronardi Produce	***	***	***	***	▼ ***
NatureSweet USA	***	***	***	***	▲ ***
Pacific Tomato Growers	***	***	***	***	▼ ***
Pure Flavor	***	***	***	***	▼ ***
Red Sun Farms	***	***	***	***	▲ ***
Smith Tomato	***	***	***	***	▲ ***
TLC Farms	***	***	***	***	▲ ***
Viereck Farms	***	***	***	***	▲ ***
West Coast Tomato	***	***	***	***	▲ ***
West Coast Tomato Growers	***	***	***	***	▲ ***
Windset Farms	***	***	***	***	***
All firms	0.18	0.20	0.22	0.22	▲ 26.4

Table continued.

Table 3.30 (Continued) Fresh tomatoes: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Unit other factory costs

Unit values in dollars per pound; change in percent

Firm	2019	2023	2024	2025	2019 to 2025 Change
DiMare Enterprises	***	***	***	***	▲ ***
DiMare Homestead	***	***	***	***	▼ ***
Gargiulo	***	***	***	***	▲ ***
Leitz Farms	***	***	***	***	▼ ***
Lipman Family Farms	***	***	***	***	▲ ***
Mastronardi Produce	***	***	***	***	▼ ***
NatureSweet USA	***	***	***	***	▼ ***
Pacific Tomato Growers	***	***	***	***	▲ ***
Pure Flavor	***	***	***	***	▲ ***
Red Sun Farms	***	***	***	***	▼ ***
Smith Tomato	***	***	***	***	▲ ***
TLC Farms	***	***	***	***	▲ ***
Viereck Farms	***	***	***	***	▲ ***
West Coast Tomato	***	***	***	***	▲ ***
West Coast Tomato Growers	***	***	***	***	▼ ***
Windset Farms	***	***	***	***	***
All firms	0.09	0.12	0.12	0.13	▲ 56.7

Table continued.

Table 3.30 (Continued) Fresh tomatoes: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Unit COGS

Unit values in dollars per pound; change in percent

Firm	2019	2023	2024	2025	2019 to 2025 Change
DiMare Enterprises	***	***	***	***	▲ ***
DiMare Homestead	***	***	***	***	▲ ***
Gargiulo	***	***	***	***	▲ ***
Leitz Farms	***	***	***	***	▲ ***
Lipman Family Farms	***	***	***	***	▲ ***
Mastronardi Produce	***	***	***	***	▼ ***
NatureSweet USA	***	***	***	***	▲ ***
Pacific Tomato Growers	***	***	***	***	▼ ***
Pure Flavor	***	***	***	***	▼ ***
Red Sun Farms	***	***	***	***	▲ ***
Smith Tomato	***	***	***	***	▲ ***
TLC Farms	***	***	***	***	▲ ***
Viereck Farms	***	***	***	***	▲ ***
West Coast Tomato	***	***	***	***	▲ ***
West Coast Tomato Growers	***	***	***	***	▲ ***
Windset Farms	***	***	***	***	***
All firms	0.45	0.57	0.61	0.63	▲40.6

Table continued.

Table 3.30 (Continued) Fresh tomatoes: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Unit gross profit or (loss)

Unit values in dollars per pound; change in percent

Firm	2019	2023	2024	2025	2019 to 2025 Change
DiMare Enterprises	***	***	***	***	▼ ***
DiMare Homestead	***	***	***	***	▼ ***
Gargiulo	***	***	***	***	▼ ***
Leitz Farms	***	***	***	***	▼ ***
Lipman Family Farms	***	***	***	***	▼ ***
Mastronardi Produce	***	***	***	***	▼ ***
NatureSweet USA	***	***	***	***	▼ ***
Pacific Tomato Growers	***	***	***	***	▼ ***
Pure Flavor	***	***	***	***	▼ ***
Red Sun Farms	***	***	***	***	▼ ***
Smith Tomato	***	***	***	***	▼ ***
TLC Farms	***	***	***	***	▲ ***
Viereck Farms	***	***	***	***	▼ ***
West Coast Tomato	***	***	***	***	▼ ***
West Coast Tomato Growers	***	***	***	***	▼ ***
Windset Farms	***	***	***	***	***
All firms	0.12	0.07	0.25	0.00	▼(98.1)

Table continued.

Table 3.30 (Continued) Fresh tomatoes: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Unit SG&A expenses

Unit values in dollars per pound; change in percent

Firm	2019	2023	2024	2025	2019 to 2025 Change
DiMare Enterprises	***	***	***	***	▲ ***
DiMare Homestead	***	***	***	***	▼ ***
Gargiulo	***	***	***	***	▼ ***
Leitz Farms	***	***	***	***	▼ ***
Lipman Family Farms	***	***	***	***	▲ ***
Mastronardi Produce	***	***	***	***	▲ ***
NatureSweet USA	***	***	***	***	▲ ***
Pacific Tomato Growers	***	***	***	***	▼ ***
Pure Flavor	***	***	***	***	▼ ***
Red Sun Farms	***	***	***	***	▲ ***
Smith Tomato	***	***	***	***	▲ ***
TLC Farms	***	***	***	***	▲ ***
Viereck Farms	***	***	***	***	***
West Coast Tomato	***	***	***	***	▲ ***
West Coast Tomato Growers	***	***	***	***	▲ ***
Windset Farms	***	***	***	***	***
All firms	0.04	0.06	0.07	0.06	▲ 54.0

Table continued.

Table 3.30 (Continued) Fresh tomatoes: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Unit operating income or (loss)

Unit values in dollars per pound; change in percent

Firm	2019	2023	2024	2025	2019 to 2025 Change
DiMare Enterprises	***	***	***	***	▼ ***
DiMare Homestead	***	***	***	***	▼ ***
Gargiulo	***	***	***	***	▼ ***
Leitz Farms	***	***	***	***	▼ ***
Lipman Family Farms	***	***	***	***	▼ ***
Mastronardi Produce	***	***	***	***	▼ ***
NatureSweet USA	***	***	***	***	▼ ***
Pacific Tomato Growers	***	***	***	***	▼ ***
Pure Flavor	***	***	***	***	▲ ***
Red Sun Farms	***	***	***	***	▼ ***
Smith Tomato	***	***	***	***	▼ ***
TLC Farms	***	***	***	***	▲ ***
Viereck Farms	***	***	***	***	▼ ***
West Coast Tomato	***	***	***	***	▼ ***
West Coast Tomato Growers	***	***	***	***	▼ ***
Windset Farms	***	***	***	***	***
All firms	0.07	0.01	0.17	(0.06)	▼ —

Table continued.

Table 3.30 (Continued) Fresh tomatoes: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Unit net income or (loss)

Unit values in dollars per pound; change in percent

Firm	2019	2023	2024	2025	2019 to 2025 Change
DiMare Enterprises	***	***	***	***	▼ ***
DiMare Homestead	***	***	***	***	▲ ***
Gargiulo	***	***	***	***	▼ ***
Leitz Farms	***	***	***	***	▼ ***
Lipman Family Farms	***	***	***	***	▼ ***
Mastronardi Produce	***	***	***	***	▼ ***
NatureSweet USA	***	***	***	***	▼ ***
Pacific Tomato Growers	***	***	***	***	▼ ***
Pure Flavor	***	***	***	***	▲ ***
Red Sun Farms	***	***	***	***	▼ ***
Smith Tomato	***	***	***	***	▼ ***
TLC Farms	***	***	***	***	▲ ***
Viereck Farms	***	***	***	***	▼ ***
West Coast Tomato	***	***	***	***	▼ ***
West Coast Tomato Growers	***	***	***	***	▼ ***
Windset Farms	***	***	***	***	***
All firms	0.09	0.07	0.16	(0.03)	▼ —

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Shares and ratios shown as “0.0” represent values greater than zero, but less than “0.05” percent. Zeroes, null values, and undefined calculations are suppressed and shown as “—”. Percent changes only calculated when both comparison values are positives. Only directional change are provided when one or both comparison values represent a loss.

Net sales

Net sales consisted primarily of commercial sales but also included transfers to related firms which ranged between 19.6 and 21.8 percent of total sales quantity from 2023 to 2025. Noncommercial sales are included in the financial data, but not shown separately in this section of the report.^{11 12} Total sales quantity increased each year from 2023 to 2025, while total sales value increased irregularly with all the increase occurring from 2023 to 2024. While both sales quantity and sales value increased overall, the sales value fluctuations were more pronounced.^{13 14} When comparing 2025 with 2019, sales quantity and value were higher in 2025. As shown in table 3.30, U.S. producers were somewhat uniform in directional trends for sales quantity and value. On a per-pound basis, sales value fluctuated notably each year increasing from 2023 to 2024 then decreasing in 2025, but overall only decreased by \$0.01 per pound from 2023 to 2025. When comparing 2025 to 2019 the average per-pound value was higher in 2025. On a firm-by-firm basis, U.S. producers varied in value but were generally

¹¹ Transfers to related firms were reported by *** and mainly consisted of sales to sister companies and wholly owned subsidiaries. Transfer sales were reported at fair market value. U.S. producers' questionnaire, section 2.14.

¹² ***.

¹³ ***. Email from ***, April 10, 2026.

¹⁴ ***. Email from ***, April 12, 2026.

uniform in directional trends with the majority reporting a notable increase from 2023 to 2024 followed by a similarly notable decrease from 2024 to 2025.¹⁵

Cost of goods sold and gross profit or loss

Raw material costs, direct labor and other factory costs accounted for 43.0, 35.8, and 21.3 percent of total COGS, respectively, in 2025. Total raw material costs increased each year in value and on a per-pound basis from 2023 to 2025. As shown in table 3.28, U.S. producers' raw material costs were generally comparable in value and in directional trends. As a ratio to net sales, raw material costs increased irregularly from 2023 to 2025.

Table 3.31 presents raw materials, by type. The table shows that other material inputs such as packaging accounted for the majority of raw material cost (62.3 percent) in 2025, while seeds, fertilizer, pesticides, and herbicides accounted for the remaining 37.7 percent.

Table 3.31 Fresh tomatoes: U.S. producers' raw material costs in 2025

Value in 1,000 dollars; share of value in percent

Item	Value	Share of value
Seeds/plants	44,280	12.6
Fertilizer	41,557	11.8
Pesticides and herbicides	46,690	13.3
Other material inputs	218,650	62.3
All raw materials	351,176	100.0

Source: Compiled from data submitted in response to Commission questionnaires.

Direct labor and other factory costs, the second largest and smallest components of COGS, respectively, in all years in which data were collected, increased each year in value and fluctuated within a narrow range on a per-pound basis from 2023 to 2025. On a firm-by-firm basis, the average per-pound values for direct labor costs and other factory costs varied between U.S. producers reflecting at least in part the differences in growing methods between the firms (see table 3.30). As a ratio to net sales, direct labor and other factory costs increased overall from 2023 to 2025.

¹⁵ ***. Emails from *** and *** April 6 and April 8, 2026.

Total COGS increased each year in value and on a per-pound basis from 2023 to 2025. When comparing 2025 with 2019, total COGS was higher in 2025. As a ratio to net sales, total COGS increased irregularly from 2023 to 2025, and was higher in 2025 when compared to 2019.¹⁶

As shown in table 3.28, gross profit increased notably from 2023 to 2024 then notably decreased from 2024 to 2025 (reflecting the larger fluctuations in sales value relative to the fluctuations of COGS) and overall decreased from 2023 to 2025. When comparing 2025 with 2019, gross profit was notably lower in 2025. On a firm-by-firm basis, the majority of U.S. producers reported a decrease in gross profit or worsening losses from 2023 to 2025, and 11 of the responding U.S. producers reported a lower gross profit in 2025 compared with 2019 (see table 3.30). As a ratio to net sales, gross profit decreased notably from 2023 to 2025, and was notably lower in 2025 compared with 2019.

SG&A expenses and operating income or loss

As shown in table 3.28, SG&A expenses increased irregularly both in value and as a ratio to net sales from 2023 to 2025, and were higher in 2025 compared with 2019.

Operating income followed trends that were similar to gross profit with differences reflecting fluctuations in SG&A expenses. Operating income increased from 2023 to 2024 before decreasing to a loss in 2025. When comparing 2025 with 2019, operating income was worse (a loss) in 2025 compared to a positive income in 2019. On a firm-by-firm basis, the majority of U.S. producers reported a decrease in operating income from 2023 to 2025, and 12 of the responding U.S. producers reported a lower operating income in 2025 compared with 2019 (see table 3.30). As a ratio to net sales, operating income decreased from 2023 to 2025 and was lower in 2025 compared with 2019.

¹⁶ ***. Emails from ***, April 3, 2026.

All other expenses and net income or loss

Classified below the operating income level are interest expense, other expense, and other income items. In table 3.28, these items are aggregated and only the net amount is shown as “all other expense or (income).” Total other expense/income (comprised mostly of other income and expense items) decreased from 2023 to 2025, and was higher in 2025 compared with 2019.¹⁷

As shown in table 3.28, net income followed the same trends as gross profit and operating income with differences reflecting the effect of interest expense and other expense items, varying in terms of their relative importance during the period for which data were collected and to the extent to which they were partially offset by other income.

Capital expenditures and research and development expenses

Table 3.32 presents capital expenditures, by firm, and table 3.34 presents R&D expenses, by firm. Tables 3.33 and 3.35 present the firms’ narrative explanations of the nature, focus, and significance of their capital expenditures and R&D expenses, respectively.¹⁸

¹⁷ ***. U.S. producers questionnaire response, section 3.10a, and email from ***, April 15, 2026.

¹⁸ *** were the only companies to report any R&D expenses.

Table 3.32 Fresh tomatoes: U.S. producers' capital expenditures, by firm and period

Value in 1,000 dollars; change in percent

Firm	2019	2023	2024	2025	2019-2025 Change
DiMare Enterprises	***	***	***	***	▲ ***
DiMare Homestead	***	***	***	***	▲ ***
Gargiulo	***	***	***	***	▲ ***
Leitz Farms	***	***	***	***	***
Lipman Family Farms	***	***	***	***	▲ ***
Mastronardi Produce	***	***	***	***	▼ ***
NatureSweet USA	***	***	***	***	▼ ***
Pacific Tomato Growers	***	***	***	***	▼ ***
Pure Flavor	***	***	***	***	▲ —
Red Sun Farms	***	***	***	***	▲ ***
Smith Tomato	***	***	***	***	***
TLC Farms	***	***	***	***	▲ —
Viereck Farms	***	***	***	***	▼ ***
West Coast Tomato	***	***	***	***	▼ ***
West Coast Tomato Growers	***	***	***	***	***
Windset Farms	***	***	***	***	***
All firms	66,331	82,114	59,356	96,038	▲ 44.8

Source: Compiled from data submitted in response to Commission questionnaires.

Table 3.33 Fresh tomatoes: U.S. producers' narrative descriptions of their capital expenditures, by firm

Firm	Narrative on capital expenditures
DiMare Enterprises	***
DiMare Homestead	***
Gargiulo	***
Leitz Farms	***
Lipman Family Farms	***
Mastronardi Produce	***
NatureSweet USA	***
Pacific Tomato Growers	***

Firm	Narrative on capital expenditures
Pure Flavor	***
Red Sun Farms	***
Smith Tomato	***
TLC Farms	***
Viereck Farms	***
West Coast Tomato	***
West Coast Tomato Growers	***
Windset Farms	***

Source: Compiled from data submitted in response to Commission questionnaires.

Table 3.34 Fresh tomatoes: U.S. producers' R&D expenses, by firm and period

Value in 1,000 dollars

Firm	2019	2023	2024	2025	2019 to 2025 change (percent)
***	***	***	***	***	▲ ***
***	***	***	***	***	▲ ***
***	***	***	***	***	▼ ***
All firms	***	***	***	***	***

Source: Compiled from data submitted in response to Commission questionnaires.

Table 3.35 Fresh tomatoes: U.S. producers' narrative descriptions of their R&D expenses, by firm

Firm	Narrative on R&D expenses
***	***
***	***
***	***

Source: Compiled from data submitted in response to Commission questionnaires.

Assets and return on assets

Table 3.36 presents data on the U.S. producers' total net assets, while table 3.37 presents their operating ROA.¹⁹ Table 3.38 presents U.S. producers' narrative responses explaining their major asset categories and any significant changes in asset levels over time.

Table 3.36 Fresh tomatoes: U.S. producers' total net assets, by firm and period

Value in 1,000 dollars; change in percent

Firm	2019	2023	2024	2025	2019 to 2025 Change
DiMare Enterprises	***	***	***	***	▼ ***
DiMare Homestead	***	***	***	***	▲ ***
Gargiulo	***	***	***	***	▲ ***
Leitz Farms	***	***	***	***	▲ ***
Lipman Family Farms	***	***	***	***	▲ ***
Mastronardi Produce	***	***	***	***	▲ ***
NatureSweet USA	***	***	***	***	▼ ***
Pacific Tomato Growers	***	***	***	***	▲ ***
Pure Flavor	***	***	***	***	▲ ***
Red Sun Farms	***	***	***	***	▼ ***
Smith Tomato	***	***	***	***	▲ ***
TLC Farms	***	***	***	***	▲ ***
Viereck Farms	***	***	***	***	▲ ***
West Coast Tomato	***	***	***	***	▼ ***
West Coast Tomato Growers	***	***	***	***	▲ ***
Windset Farms	***	***	***	***	***
All firms	940,611	1,279,936	1,303,705	1,320,101	▲ 40.3

Source: Compiled from data submitted in response to Commission questionnaires.

¹⁹ The operating ROA is calculated as operating income divided by total assets. With respect to a firm's overall operations, the total asset value reflects an aggregation of a number of assets which are generally not product specific. Thus, high-level allocations are generally required in order to report a total asset value on a product-specific basis.

Table 3.37 Fresh tomatoes: U.S. producers' ROA, by firm and period

Ratio in percent; change in percent

Firm	2019	2023	2024	2025	2019 to 2025 Change
DiMare Enterprises	***	***	***	***	▼***
DiMare Homestead	***	***	***	***	▼***
Gargiulo	***	***	***	***	▼***
Leitz Farms	***	***	***	***	▼***
Lipman Family Farms	***	***	***	***	▼***
Mastronardi Produce	***	***	***	***	▼***
NatureSweet USA	***	***	***	***	▼***
Pacific Tomato Growers	***	***	***	***	▲***
Pure Flavor	***	***	***	***	▲***
Red Sun Farms	***	***	***	***	▼***
Smith Tomato	***	***	***	***	▼***
TLC Farms	***	***	***	***	▲***
Viereck Farms	***	***	***	***	▼***
West Coast Tomato	***	***	***	***	▼***
West Coast Tomato Growers	***	***	***	***	▼***
Windset Farms	***	***	***	***	***
All firms	9.4	1.1	16.2	(6.1)	▼(15.5)

Source: Compiled from data submitted in response to Commission questionnaires.

Table 3.38 Fresh tomatoes: U.S. producers' narrative descriptions of their total net assets, by firm

Firm	Narrative on assets
DiMare Enterprises	***
DiMare Homestead	***
Gargiulo	***
Leitz Farms	***
Lipman Family Farms	***
Mastronardi Produce	***
NatureSweet USA	***
Pacific Tomato Growers	***
Pure Flavor	***
Red Sun Farms	***
Smith Tomato	***
TLC Farms	***
Viereck Farms	***
West Coast Tomato	***
West Coast Tomato Growers	***
Windset Farms	***

Source: Compiled from data submitted in response to Commission questionnaires.

Part 4: U.S. imports and the foreign industries

U.S. imports

Overview

The Commission issued questionnaires to 100 firms believed to import fresh tomatoes since January 1, 2019. Eighty-two firms provided data and information in response to the questionnaires. Based on official Commerce statistics for imports of fresh tomatoes, importers' questionnaire data accounted 77.6 percent of subject imports and 45.5 percent of imports from Canada, and 73.5 percent of imports of fresh tomatoes from all import sources during 2025. In light of the data coverage provided by the questionnaire responses, import data in this report are based on official Commerce statistics for fresh tomatoes.¹ In 2025, slightly less than 90 percent of imports of fresh tomatoes were from Mexico.

¹ Official Commerce statistics are compiled using HTS statistical reporting numbers within the 0702 subheading. There are 85 HTS statistical reporting numbers under which fresh tomatoes could potentially arrive. These data were accessed on April 10, 2026.

Imports from subject and nonsubject countries

Table 4.1 and figure 4.1 present information on U.S. imports of fresh tomatoes from Mexico and all other sources during 2019 and 2023 to 2025. Imports from Mexico represented approximately 90 percent of the share of U.S. imports of fresh tomatoes during 2023 and 2024, along with 2019, by quantity. U.S. imports of fresh tomatoes from Mexico accounted for 88.3 percent, based on quantity, as a share of all U.S. imports of fresh tomatoes in 2025. U.S. imports of fresh tomatoes from Mexico fluctuated during 2023-2025, ending slightly lower in 2025 than in 2023 by quantity and lower by value. The quantity of U.S. imports of fresh tomatoes from Mexico was higher in 2025 than in 2019, by 8.0 percent, by quantity, and were 17.4 percent higher, by value. Nonsubject imports from Canada increased from 2023 to 2025, by quantity and value. The quantity of nonsubject U.S. imports of fresh tomatoes from Canada were 46.8 percent higher in 2025 than in 2019, based on quantity and were 68.0 percent higher, by value.

Average unit values (“AUVs”) of fresh tomatoes from Mexico increased by 8.7 percent from 2019 compared to 2025, but fluctuated and were lower from 2023 to 2025. AUVs of fresh tomatoes from Canada increased by 14.4 percent from 2019 to 2025. AUVs of fresh tomatoes from all import sources were 11.7 percent higher in 2025 than in 2019.

As a ratio to U.S. production, imports of fresh tomatoes from Mexico were 291.4 percent in 2025. While nearly three times the quantity of U.S. production, this ratio was lower than in 2023 and 2024, and slightly below the level of 298.5 percent in 2019.

Table 4.1 Fresh tomatoes: U.S. imports by source and period

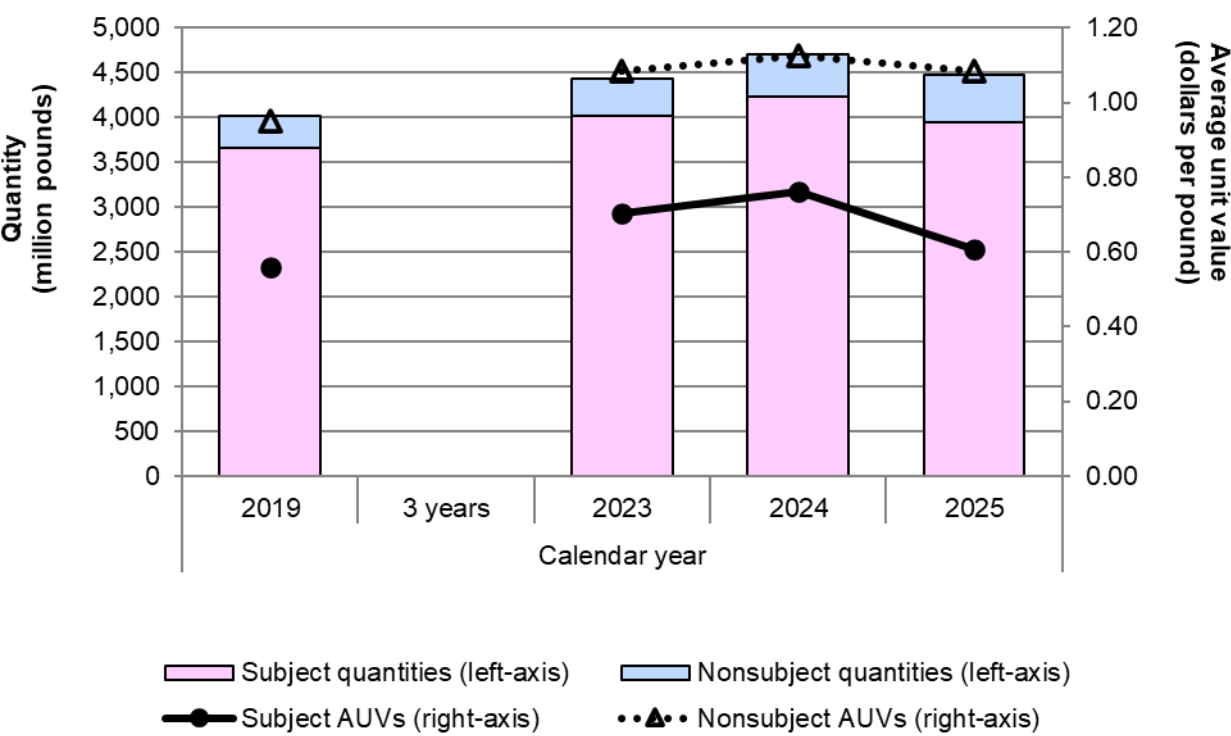
Quantity in 1,000 pounds; value in 1,000 dollars; unit value in dollars per pound; shares and ratios in percent; ratios represent the ratio to U.S. production

Source	Measure	2019	2023	2024	2025	2019-2025 Change
Mexico	Quantity	3,661,788	4,015,226	4,235,705	3,953,320	▲ 8.0
Canada	Quantity	330,445	386,273	430,942	485,248	▲ 46.8
All other sources	Quantity	30,370	35,412	35,798	36,114	▲ 18.9
Nonsubject sources	Quantity	360,815	421,685	466,740	521,362	▲ 44.5
All import sources	Quantity	4,022,603	4,436,911	4,702,445	4,474,682	▲ 11.2
Mexico	Value	2,048,068	2,819,090	3,234,167	2,404,333	▲ 17.4
Canada	Value	308,284	410,740	475,860	517,840	▲ 68.0
All other sources	Value	34,247	47,168	49,297	47,087	▲ 37.5
Nonsubject sources	Value	342,531	457,908	525,158	564,927	▲ 64.9
All import sources	Value	2,390,599	3,276,997	3,759,324	2,969,260	▲ 24.2
Mexico	Unit value	0.56	0.70	0.76	0.61	▲ 8.7
Canada	Unit value	0.93	1.06	1.10	1.07	▲ 14.4
All other sources	Unit value	1.13	1.33	1.38	1.30	▲ 15.6
Nonsubject sources	Unit value	0.95	1.09	1.13	1.08	▲ 14.1
All import sources	Unit value	0.59	0.74	0.80	0.66	▲ 11.7
Mexico	Share of quantity	91.0	90.5	90.1	88.3	▼ (2.7)
Canada	Share of quantity	8.2	8.7	9.2	10.8	▲ 2.6
All other sources	Share of quantity	0.8	0.8	0.8	0.8	▲ 0.1
Nonsubject sources	Share of quantity	9.0	9.5	9.9	11.7	▲ 2.7
All import sources	Share of quantity	100.0	100.0	100.0	100.0	—
Mexico	Share of value	85.7	86.0	86.0	81.0	▼ (4.7)
Canada	Share of value	12.9	12.5	12.7	17.4	▲ 4.5
All other sources	Share of value	1.4	1.4	1.3	1.6	▲ 0.2
Nonsubject sources	Share of value	14.3	14.0	14.0	19.0	▲ 4.7
All import sources	Share of value	100.0	100.0	100.0	100.0	—
Mexico	Ratio	298.5	327.4	337.7	291.4	▼ (7.1)
Canada	Ratio	26.9	31.5	34.4	35.8	▲ 8.8
All other sources	Ratio	2.5	2.9	2.9	2.7	▲ 0.2
Nonsubject sources	Ratio	29.4	34.4	37.2	38.4	▲ 9.0
All import sources	Ratio	327.9	361.8	374.9	329.8	▲ 1.9

Source: Compiled from official U.S. imports statistics of the U.S. Department of Commerce using the HTS statistical reporting numbers listed for fresh tomatoes in footnote 2 of this report, accessed April 10, 2026. Imports are based on the imports for consumption data series. Imports value data reflect the landed duty-paid value.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "—".

Figure 4.1 Fresh tomatoes: U.S. imports quantities and average unit values, by source and period



Source: Compiled from official U.S. imports statistics of the U.S. Department of Commerce using the HTS statistical reporting numbers listed for fresh tomatoes in footnote 2 of this report, accessed April 10, 2026. Imports are based on the imports for consumption data series. Imports value data reflect the landed duty-paid value.

Table 4.2 and figure 4.2 present monthly imports of fresh tomatoes from 2019 to 2025, and additionally January to March 2026.

Table 4.2 Fresh tomatoes: Quantity of U.S. imports, by source and month

Quantity in 1,000 pounds

Year	Month	Mexico	Canada	All other sources	Nonsubject sources	All import sources
2019	January	425,189	1,701	3,991	5,692	430,880
2019	February	356,265	1,521	3,196	4,716	360,981
2019	March	403,946	5,379	2,989	8,367	412,314
2019	April	376,465	26,676	2,980	29,656	406,120
2019	May	289,196	43,765	3,187	46,952	336,147
2019	June	276,995	49,070	2,262	51,332	328,327
2019	July	225,692	56,970	1,657	58,627	284,319
2019	August	224,768	53,441	1,482	54,923	279,691
2019	September	223,965	39,023	1,376	40,399	264,364
2019	October	274,637	26,345	1,621	27,966	302,602
2019	November	287,948	17,803	2,376	20,180	308,128
2019	December	296,723	8,753	3,254	12,007	308,729
2020	January	394,159	4,363	5,232	9,595	403,754
2020	February	326,913	3,567	3,597	7,163	334,076
2020	March	375,197	8,447	3,760	12,207	387,404
2020	April	270,570	31,077	3,389	34,467	305,037
2020	May	312,811	46,985	4,346	51,330	364,141
2020	June	304,111	54,382	3,410	57,792	361,903
2020	July	263,456	59,667	2,445	62,112	325,568
2020	August	245,466	43,502	1,739	45,241	290,707
2020	September	257,557	30,331	2,521	32,851	290,409
2020	October	311,615	20,990	3,027	24,017	335,632
2020	November	310,259	20,043	3,276	23,319	333,578
2020	December	306,436	10,164	4,009	14,173	320,610

Table continued.

Table 4.2 Fresh tomatoes (Continued): Quantity of U.S. imports, by source and month

Quantity in 1,000 pounds

Year	Month	Mexico	Canada	All other sources	Nonsubject sources	All import sources
2021	January	446,307	7,714	4,228	11,942	458,249
2021	February	363,944	6,856	4,396	11,252	375,196
2021	March	395,826	15,233	5,277	20,509	416,335
2021	April	335,519	38,124	4,136	42,260	377,779
2021	May	302,345	54,925	3,850	58,775	361,120
2021	June	301,254	58,198	3,867	62,065	363,319
2021	July	269,257	56,545	2,087	58,633	327,890
2021	August	262,233	47,640	1,724	49,364	311,597
2021	September	267,702	33,666	1,948	35,614	303,316
2021	October	307,969	20,305	3,001	23,306	331,275
2021	November	296,763	18,173	3,557	21,731	318,494
2021	December	317,757	10,496	3,514	14,010	331,767
2022	January	393,891	7,166	4,358	11,524	405,415
2022	February	361,725	6,272	3,902	10,174	371,899
2022	March	378,875	9,667	3,967	13,634	392,508
2022	April	356,332	25,096	3,471	28,567	384,899
2022	May	324,800	44,040	3,703	47,743	372,544
2022	June	323,017	56,741	3,301	60,043	383,060
2022	July	289,154	55,749	2,187	57,936	347,089
2022	August	290,630	49,936	2,220	52,156	342,786
2022	September	273,393	37,878	1,574	39,452	312,845
2022	October	318,546	21,671	2,400	24,070	342,616
2022	November	329,356	21,224	3,379	24,602	353,959
2022	December	342,195	13,099	3,846	16,945	359,139

Table continued.

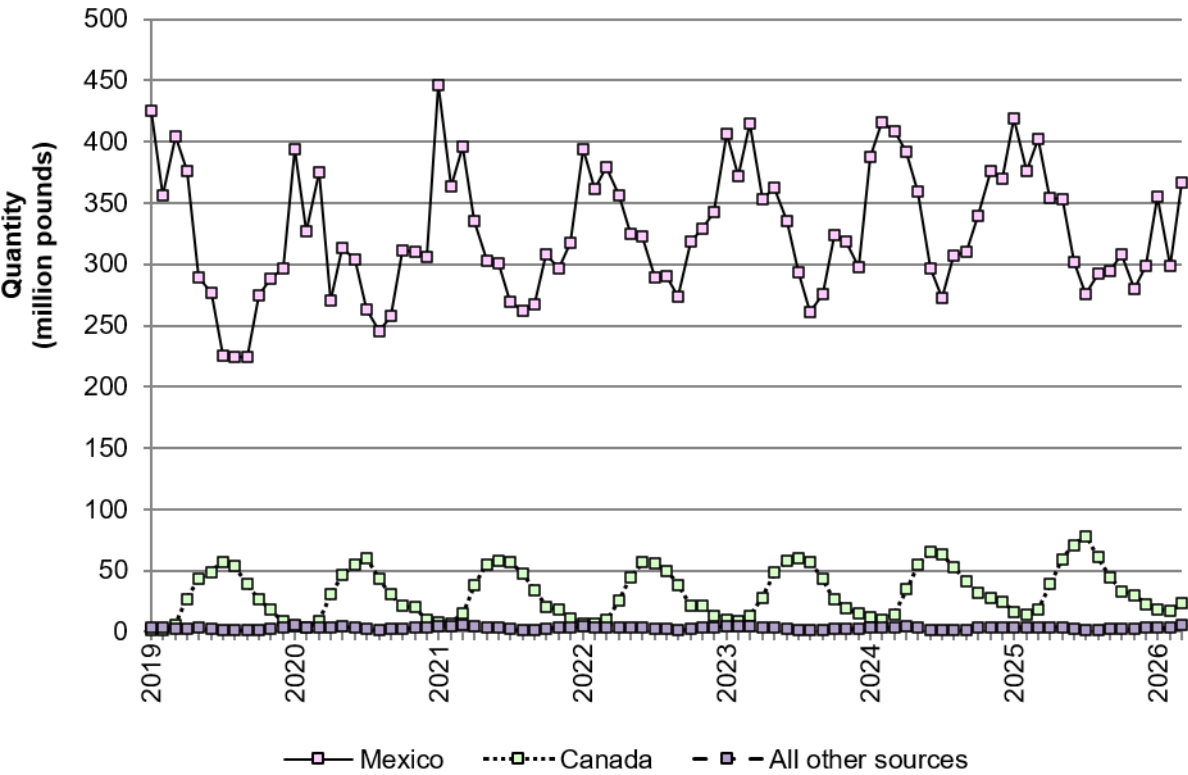
Table 4.2 Fresh tomatoes (Continued): Quantity of U.S. imports, by source and month

Quantity in 1,000 pounds

Year	Month	Mexico	Canada	All other sources	Nonsubject sources	All import sources
2023	January	406,605	9,894	4,733	14,626	421,232
2023	February	372,011	8,450	4,257	12,708	384,719
2023	March	414,858	13,184	4,103	17,287	432,146
2023	April	353,345	27,741	3,655	31,396	384,741
2023	May	362,322	48,236	3,878	52,113	414,435
2023	June	335,156	57,995	2,876	60,872	396,028
2023	July	293,438	60,011	1,786	61,797	355,235
2023	August	260,881	56,793	1,327	58,121	319,002
2023	September	275,855	43,432	1,304	44,736	320,591
2023	October	324,308	26,304	2,189	28,493	352,802
2023	November	318,685	19,639	2,548	22,187	340,872
2023	December	297,760	14,595	2,754	17,349	315,109
2024	January	387,221	11,965	3,898	15,863	403,084
2024	February	416,325	9,348	3,663	13,010	429,336
2024	March	409,074	14,418	3,588	18,006	427,080
2024	April	392,009	34,683	4,123	38,806	430,816
2024	May	359,619	55,188	3,519	58,707	418,326
2024	June	296,437	64,993	1,872	66,865	363,301
2024	July	272,188	62,986	1,181	64,167	336,355
2024	August	306,632	52,278	1,392	53,671	360,303
2024	September	310,228	41,645	1,913	43,558	353,786
2024	October	339,888	31,402	3,039	34,442	374,330
2024	November	376,324	27,494	3,583	31,077	407,401
2024	December	369,759	24,542	4,026	28,568	398,328
2025	January	418,782	16,341	3,986	20,327	439,108
2025	February	376,275	13,950	3,435	17,385	393,660
2025	March	401,951	17,785	4,010	21,795	423,745
2025	April	353,691	38,641	3,942	42,584	396,274
2025	May	352,902	59,277	3,749	63,027	415,929
2025	June	301,511	71,022	2,366	73,388	374,898
2025	July	275,468	78,098	1,635	79,732	355,200
2025	August	292,232	60,636	1,519	62,155	354,387
2025	September	294,240	44,255	2,419	46,674	340,914
2025	October	307,734	32,934	2,576	35,510	343,243
2025	November	279,705	29,776	2,879	32,654	312,359
2025	December	298,831	22,534	3,598	26,132	324,963
2026	January	354,998	18,664	3,347	22,010	377,008
2026	February	298,878	17,091	3,539	20,630	319,508
2026	March	366,334	22,996	5,141	28,137	394,471

Source: Compiled from official U.S. imports statistics of the U.S. Department of Commerce using the HTS statistical reporting numbers listed for fresh tomatoes in footnote 1 of this report, accessed June 10, 2026. Imports are based on the imports for consumption data series.

Figure 4.2 Fresh tomatoes: Quantity of U.S. imports, by source and period



Source: Compiled from official U.S. imports statistics of the U.S. Department of Commerce using the HTS statistical reporting numbers listed for fresh tomatoes in footnote 2 of this report, accessed June 10, 2026. Imports are based on the imports for consumption data series.

Table 4.3 and figure 4.3 present U.S. imports by source and half year periods.

Table 4.3 Fresh tomatoes: Quantity of U.S. imports, by source and half-year period

Quantity in 1,000 pounds

Year	Half year	Mexico	Canada	All other sources	Nonsubject sources	All import sources
2019	H1	2,128,055	128,110	18,604	146,714	2,274,769
2019	H2	1,533,733	202,334	11,766	214,101	1,747,834
2020	H1	1,983,761	148,822	23,733	172,555	2,156,315
2020	H2	1,694,789	184,698	17,016	201,714	1,896,503
2021	H1	2,145,195	181,050	25,753	206,803	2,351,998
2021	H2	1,721,682	186,826	15,831	202,657	1,924,339
2022	H1	2,138,640	148,983	22,701	171,685	2,310,324
2022	H2	1,843,274	199,556	15,605	215,161	2,058,435
2023	H1	2,244,297	165,500	23,503	189,003	2,433,300
2023	H2	1,770,929	220,773	11,909	232,683	2,003,611
2024	H1	2,260,685	190,594	20,663	211,257	2,471,942
2024	H2	1,975,020	240,348	15,135	255,483	2,230,503
2025	H1	2,205,111	217,016	21,489	238,504	2,443,615
2025	H2	1,748,209	268,232	14,625	282,858	2,031,067

Table continued.

Table 4.3 Fresh tomatoes (continued): Quantity of U.S. imports, by source and half-year period

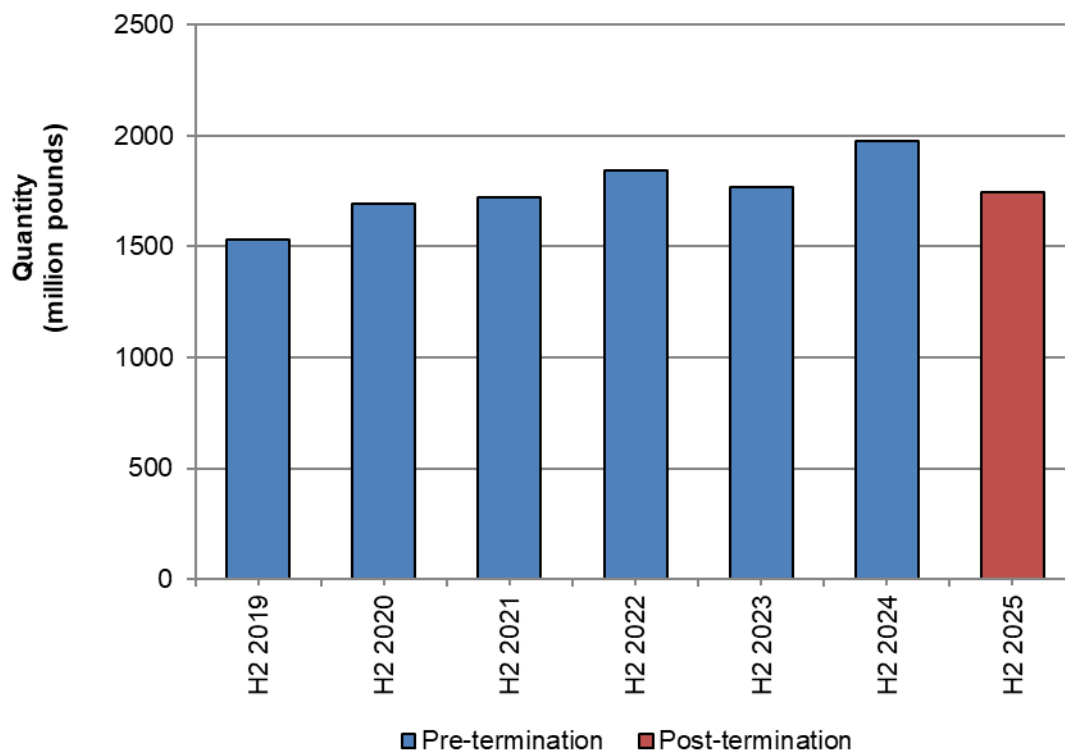
Quantity in 1,000 pounds

Year	Half year	Mexico	Canada	All other sources	Nonsubject sources	All import sources
2019	H1	93.6	5.6	0.8	6.4	100.0
2019	H2	87.8	11.6	0.7	12.2	100.0
2020	H1	92.0	6.9	1.1	8.0	100.0
2020	H2	89.4	9.7	0.9	10.6	100.0
2021	H1	91.2	7.7	1.1	8.8	100.0
2021	H2	89.5	9.7	0.8	10.5	100.0
2022	H1	92.6	6.4	1.0	7.4	100.0
2022	H2	89.5	9.7	0.8	10.5	100.0
2023	H1	92.2	6.8	1.0	7.8	100.0
2023	H2	88.4	11.0	0.6	11.6	100.0
2024	H1	91.5	7.7	0.8	8.5	100.0
2024	H2	88.5	10.8	0.7	11.5	100.0
2025	H1	90.2	8.9	0.9	9.8	100.0
2025	H2	86.1	13.2	0.7	13.9	100.0

Source: Compiled from official U.S. imports statistics of the U.S. Department of Commerce using the HTS statistical reporting numbers listed for fresh tomatoes in footnote 2 of this report, accessed April 10, 2026. Imports are based on the imports for consumption data series.

Note: H1 represents the first half of the year, January through June data, while H2 represents the second half of the year, July through December data.

Figure 4.3 Fresh tomatoes: Quantity of U.S. imports, by source and half-year period



Source: Compiled from data submitted in response to Commission questionnaires.

Table 4.4 presents U.S. importers' U.S. shipments of fresh tomatoes by growing method (hydroponic, protected, and/or open field) in 2019 and 2025. Table 4.5 presents U.S. importers' U.S. shipments of fresh tomatoes by varietal (round, plum/roma, cherry/grape, and other varieties) during 2019 and 2025. Table 4.5 presents U.S. importers' U.S. shipments of fresh tomatoes by packaging type (bulk, clam shells, trays, or other packaging) during 2019 and 2025. Table 4.6 presents U.S. importers' U.S. shipments of fresh tomatoes by picking method (vine ripe or mature green) during 2019 and 2025.

Table 4.4 Fresh tomatoes: U.S. importers' U.S. shipments of imports from Mexico, by growing method and period

Quantity in 1,000 pounds; value in 1,000 dollars, unit values in dollars per pound

Growing method	Measure	2019	2025	2019-2025 Change
Hydroponic	Quantity	***	***	▲ ***
Protected	Quantity	***	***	▲ ***
Open	Quantity	***	***	▼ ***
All growing methods	Quantity	2,245,298	2,917,232	▲ 29.9
Hydroponic	Value	***	***	▲ ***
Protected	Value	***	***	▲ ***
Open	Value	***	***	▼ ***
All growing methods	Value	1,519,036	2,211,253	▲ 45.6
Hydroponic	Unit value	***	***	▲ ***
Protected	Unit value	***	***	▲ ***
Open	Unit value	***	***	▼ ***
All growing methods	Unit value	0.68	0.76	▲ 12.0
Hydroponic	Share of quantity	***	***	▲ ***
Protected	Share of quantity	***	***	▲ ***
Open	Share of quantity	***	***	▼ ***
All growing methods	Share of quantity	100.0	100.0	—
Hydroponic	Share of value	***	***	▲ ***
Protected	Share of value	***	***	▲ ***
Open	Share of value	***	***	▼ ***
All growing methods	Share of value	100.0	100.0	—

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "—".

Table 4.5 Fresh tomatoes: U.S. importers' U.S. shipments of imports from Mexico, by varietal and period

Quantity in 1,000 pounds; value in 1,000 dollars, unit values in dollars per pound

Varietal type	Measure	2019	2025	2019-2025 Change
Round	Quantity	***	***	▼ ***
Plum/Roma	Quantity	***	***	▲ ***
Cherry/Grape	Quantity	***	***	▲ ***
Other varieties	Quantity	***	***	▲ ***
All varietals	Quantity	2,245,298	2,917,232	▲ 29.9
Round	Share	***	***	▼ ***
Plum/Roma	Share	***	***	▲ ***
Cherry/Grape	Share	***	***	▼ ***
Other varieties	Share	***	***	▼ ***
All varietals	Share	100.0	100.0	—

Source: Compiled from data submitted in response to Commission questionnaires.

Table 4.6 Fresh tomatoes: U.S. importers' U.S. shipments of imports from Mexico, by packaging type and period

Quantity in 1,000 pounds; value in 1,000 dollars, unit values in dollars per pound

Packaging type	Measure	2019	2025	2019-2025 Change
Bulk	Quantity	***	***	▲ ***
Clam shells	Quantity	***	***	▲ ***
Trays	Quantity	***	***	▲ ***
Other packaging	Quantity	***	***	▲ ***
All packaging types	Quantity	2,245,298	2,917,232	▲ 29.9
Bulk	Share	***	***	▲ ***
Clam shells	Share	***	***	▼ ***
Trays	Share	***	***	▼ ***
Other packaging	Share	***	***	▼ ***
All packaging types	Share	100.0	100.0	—

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "—".

Table 4.7 Fresh tomatoes: U.S. importers' U.S. shipments of imports from Mexico, by picking method and period

Quantity in 1,000 pounds; value in 1,000 dollars, unit values in dollars per pound

Picking method	Measure	2019	2025	2019-2025 Change
Vine ripe	Quantity	***	***	▲ ***
Mature green	Quantity	***	***	▼ ***
All picking methods	Quantity	2,245,298	2,917,232	▲ 29.9
Vine ripe	Value	***	***	▲ ***
Mature green	Value	***	***	▲ ***
All picking methods	Value	1,519,036	2,211,253	▲ 45.6
Vine ripe	Unit value	***	***	▲ ***
Mature green	Unit value	***	***	▲ ***
All types	Unit value	0.68	0.76	▲ 12.0
Vine ripe	Share of Quantity	***	***	▲ ***
Mature green	Share of Quantity	***	***	▼ ***
All picking methods	Share of Quantity	100.0	100.0	—
Vine ripe	Share of Value	***	***	▲ ***
Mature green	Share of Value	***	***	▼ ***
All picking methods	Share of Value	100.0	100.0	—

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "—".

U.S. importers' imports subsequent to December 31, 2025

The Commission requested importers to indicate whether they had imported or arranged for the importation of fresh tomatoes from Mexico for delivery after December 31, 2025. Arranged imports from Mexico accounted for more than 90 percent of all arranged imports from all import sources. Table 4.8 presents U.S. importers' arranged imports, by quarter during 2026.

Table 4.8 Fresh tomatoes: U.S. importers' arranged imports, by source and period

Quantity in 1,000 pounds

Source	Q1 2026	Q2 2026	Q3 2026	Q4 2026	Total
Mexico	285,770	238,784	57,199	52,143	633,896
Canada	18,766	14,186	11,904	10,663	55,519
All other sources	1,480	—	—	952	2,432
Nonsubject sources	20,246	14,186	11,904	11,616	57,951
All import sources	306,016	252,970	69,102	63,759	691,847

Source: Compiled from data submitted in response to Commission questionnaires.

U.S. inventories of imported merchandise

Table 4.9 presents data for inventories of U.S. imports of fresh tomatoes from Mexico and all other sources held in the United States.

Table 4.9 Fresh tomatoes: U.S. importers' inventories and their ratio to select items, by source and period

Quantity in 1,000 pounds; ratio in percent

Measure	Source	2019	2023	2024	2025	2019-2025 Change
Inventories quantity	Mexico	17,780	25,469	30,910	47,095	▲ 164.9
Ratio to imports	Mexico	7.5	0.9	1.0	1.5	▲ 5.9
Ratio to U.S. shipments of imports	Mexico	7.9	0.9	1.0	1.6	▲ 6.3
Ratio to total shipments of imports	Mexico	7.5	0.9	1.0	1.5	▲ 5.9
Inventories quantity	Canada	16	91	252	4,144	▲ 25,427.2
Ratio to imports	Canada	0.1	0.0	0.1	1.9	▲ 1.8
Ratio to U.S. shipments of imports	Canada	0.1	0.0	0.1	1.9	▲ 1.8
Ratio to total shipments of imports	Canada	0.1	0.0	0.1	1.9	▲ 1.8
Inventories quantity	All other sources	—	—	11	—	—
Ratio to imports	All other sources	—	—	2.0	—	—
Ratio to U.S. shipments of imports	All other sources	—	—	2.1	—	—
Ratio to total shipments of imports	All other sources	—	—	2.1	—	—
Inventories quantity	Nonsubject	16	91	263	4,144	▲ 25,427.2
Ratio to imports	Nonsubject	0.1	0.0	0.1	1.9	▲ 1.8
Ratio to U.S. shipments of imports	Nonsubject	0.1	0.0	0.1	1.9	▲ 1.8
Ratio to total shipments of imports	Nonsubject	0.1	0.0	0.1	1.9	▲ 1.8
Inventories quantity	All sources	17,796	25,560	31,172	51,239	▲ 187.9
Ratio to imports	All sources	7.0	0.8	0.9	1.6	▼ (5.5)
Ratio to U.S. shipments of imports	All sources	7.4	0.9	1.0	1.6	▼ (5.8)
Ratio to total shipments of imports	All sources	7.1	0.8	0.9	1.6	▼ (5.5)

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "—".

The industry in Mexico

Overview

The Commission issued questionnaires to all members of the four major tomato growing associations in Mexico. The Commission received usable responses from 213 producers or exporters to which it issued questionnaires.² These firms' total reported exports to the United States accounted for approximately 69.9 percent of U.S. imports of fresh tomatoes from Mexico in 2025. Due to the vast number of foreign producer/exporter questionnaires, staff will not list each individual firm with its estimated percent of fresh tomatoes production and exports to the United States in 2025.

² In addition to tomatoes, producers reported the ability to grow a wide range of out-of-scope agricultural products on the same land, including bell peppers, corn, cucumbers, eggplant, and sorghum.

Table 4.10 presents events in Mexico's industry since January 1, 2019.

Table 4.10 Fresh tomatoes: Developments in Mexico's industry since 2019

Item	Firm	Event
Expansion	NatureSweet	In October 2021, U.S.-based tomato grower NatureSweet announced it was expanding its operations in Mexico through a joint venture with Mexican greenhouse firm Ganfer, adding 200 acres of greenhouse production space.
Change in policy	---	Effective June 2022, the United States imposed a federal order that required imported tomatoes—including those from Mexico—be accompanied with declarations that the produce was inspected and found free of the tomato brown rugose fruit virus (ToBRFV).
Expansion	Lipman Family Farms	In July 2022, Florida-based tomato producer Lipman Family Farms announced it closed a deal to purchase a 75-acre greenhouse growing facility in Jalisco, Mexico.
Weather conditions	---	From 2022 through 2024, large portions of northern, central, and southern Mexico were affected by drought conditions due to a lack of rain; nearly 76 percent of the country was experiencing drought conditions as of July 2024, marking it as the most widespread drought in Mexico since 2011.
Change in policy	---	Effective June 2024, the United States lifted restrictions that had previously required imports of tomatoes from Mexico, beginning in June 2022, to be accompanied by an inspection certificate verifying the produce as free of ToBRFV.
Change in policy	---	In August 2025, the Mexican government announced a minimum export price for fresh tomatoes in order to protect domestic production and ensure internal supply in response to the United States' withdrawal from the 2019 suspension agreement on fresh tomatoes from Mexico.

Sources: Hortidaily, "The US lifts restrictions on Mexican tomato imports," <https://www.hortidaily.com/article/9637193/the-us-lifts-restrictions-on-mexican-tomato-imports/>, retrieved April 15, 2026; Koger, "USDA changes import rules to guard against plant virus," <https://www.thepacker.com/news/produce-crops/usda-changes-import-rules-guard-against-plant-virus>, retrieved April 14, 2026; Manning, "NatureSweet expands with new joint venture," <https://www.producegrower.com/news/naturesweet-joint-venture/>, retrieved April 22, 2026; O'Boyle, "Mexico sets minimum export prices for fresh tomatoes," <https://www.reuters.com/world/americas/mexico-sets-minimum-export-prices-fresh-tomatoes-2025-08-10/>, retrieved April 14, 2026; The Produce News, "Lipman expands with Jalisco acquisition," <https://theproducenews.com/greenhouse-produce/lipman-expands-jalisco-acquisition#:~:text=July%2028%2C%202022,time%20to%20the%20end%2Duser.>, retrieved April 15, 2026; Thiem, "Multi-year drought and heat waves across Mexico in 2024," <https://www.climate.gov/news-features/event-tracker/multi-year-droughtand-heat-waves-across-mexico-2024>, retrieved April 15, 2026.

Table 4.11 presents information regarding the growing regions in Mexico on the fresh tomatoes and the growing operations of the responding producers and exporters in Mexico. In both 2019 and 2025, the Sinaloa growing region had the largest growing and production in Mexico, based on reporting province. The second largest growing region was listed as “other” which included the majority of responses reporting as and Jalisco provinces.

Table 4.11 Fresh tomatoes: Summary data on firms in Mexico (growing region), 2025

Firm	Measure	2019	2025	2019-2025 Change
Sinaloa	Production	1,222,159	1,215,665	▼(0.5)
Sonora	Production	284,112	373,210	▲31.4
Baja (California)	Production	307,610	371,500	▲20.8
San Luis Potosi	Production	92,749	157,691	▲70.0
Michoacan	Production	31,818	57,859	▲81.8
Morelos	Production	—	—	—
Baja California Sur	Production	290,483	334,856	▲15.3
Other	Production	1,043,287	1,439,258	▲38.0
All regions	Production	3,272,219	3,950,040	▲20.7
Sinaloa	Share	37.3	30.8	▼(6.6)
Sonora	Share	8.7	9.4	▲0.8
Baja (California)	Share	9.4	9.4	▲0.0
San Luis Potosi	Share	2.8	4.0	▲1.2
Michoacan	Share	1.0	1.5	▲0.5
Morelos	Share	—	—	—
Baja California Sur	Share	8.9	8.5	▼(0.4)
Other	Share	31.9	36.4	▲4.6
All regions	Share	100.0	100.0	—
Sinaloa	Count	31	40	▲9
Sonora	Count	22	28	▲6
Baja (California)	Count	14	17	▲3
San Luis Potosi	Count	5	9	▲4
Michoacan	Count	8	14	▲6
Morelos	Count	—	—	—
Baja California Sur	Count	13	18	▲5
Other	Count	65	91	▲26
All regions	Count	137	190	▲53

Source: Compiled from data submitted in response to Commission questionnaires.

Changes in operations

Producers in Mexico were asked to report any change in the character of their operations or organization relating to the production of fresh tomatoes since January 1, 2019. 173 of 213 producers indicated in their questionnaires that they had experienced such changes. Table 4.12 presents the count of changes identified by these producers. Table 4.12 presents the count of firms that indicated constraints on practical capacity in Mexico, since 2019. Table 4.13 presents Mexican producers month-to-month growth and peak production counts when growing, based on environment and the month. Table 4.14 presents Mexican producers month-to-month growth and peak production counts when harvesting, based on environment and the month. Figures 4.3, 4.4, and 4.5 present count of peak growing and harvesting months for hydroponic growing methods, count of peak growing and harvesting months for protected growing methods, and count of peak growing and harvesting months for open field growing methods, by month.

Table 4.12 Fresh tomatoes: Reported count of changes in operations in Mexico, since January 1, 2019, by firm

Item	Since 2019	Since 2025	Any
New acreage planted	75	41	91
Acreage replaced with new plants	22	21	32
Acreage taken out of production	21	45	55
Packing and/or chilling operation openings	23	9	29
Packing and/or chilling operation closings	8	8	13
Disease or pest-related events	34	22	40
Changes in labor availability or costs	66	71	92
Development of agricultural land	6	6	9
Shift in product mix between products	10	13	19
Expansion into distribution/other levels supply chain	8	6	12
Changes in customer program structure	15	27	30
Changes in multi-origin supply programs	1	5	6
Weather-related or force majeure events	23	20	32
Changes since AD order took effect	12	66	69
Other	30	28	42
Any item reported	137	144	175

Source: Compiled from data submitted in response to Commission questionnaires.

Table 4.13 Fresh tomatoes: Reported count of constraints on practical capacity in Mexico, since January 1, 2019, by firm

Item	Since 2019
Growing/harvesting bottlenecks	35
Existing labor force	91
Supply of material inputs	36
Fuel or energy	24
Storage capacity	7
Logistics/transportation	24
Other constraints	58

Source: Compiled from data submitted in response to Commission questionnaires.

Table 4.14 Fresh tomatoes: Foreign producers' month-by-month growth and peak production counts when growing, by environment and month

Month	Hydroponic	Protected	Open	Any
January	42	53	16	101
February	45	66	15	114
March	45	65	14	112
April	54	66	10	118
May	53	67	10	120
June	54	55	11	113
July	51	46	14	99
August	47	50	23	106
September	46	65	38	128
October	45	64	37	125
November	45	69	35	127
December	39	60	31	113

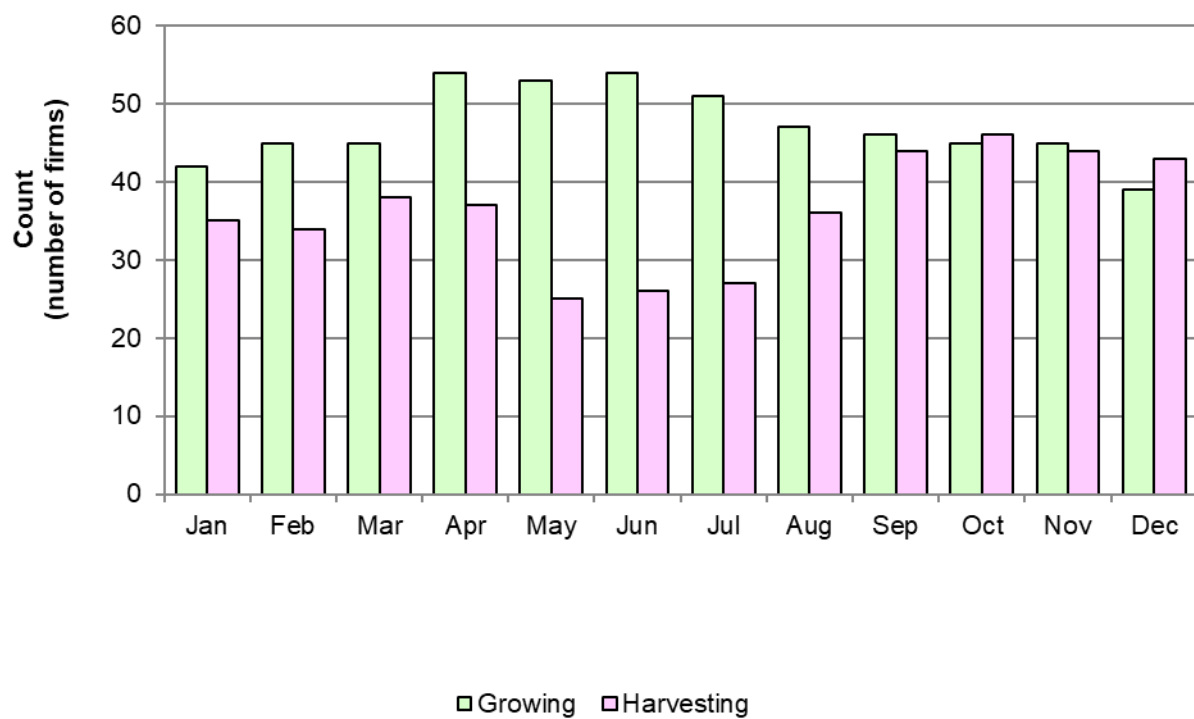
Source: Compiled from data submitted in response to Commission questionnaires.

Table 4.15 Fresh tomatoes: Foreign producers' month-by-month growth and peak production counts when harvesting, by environment and month

Month	Hydroponic	Protected	Open	Any
January	35	48	32	97
February	34	50	32	96
March	38	54	27	102
April	37	64	16	106
May	25	59	11	85
June	26	54	9	80
July	27	49	7	76
August	36	46	8	86
September	44	48	12	98
October	46	46	13	96
November	44	47	15	95
December	43	49	21	101

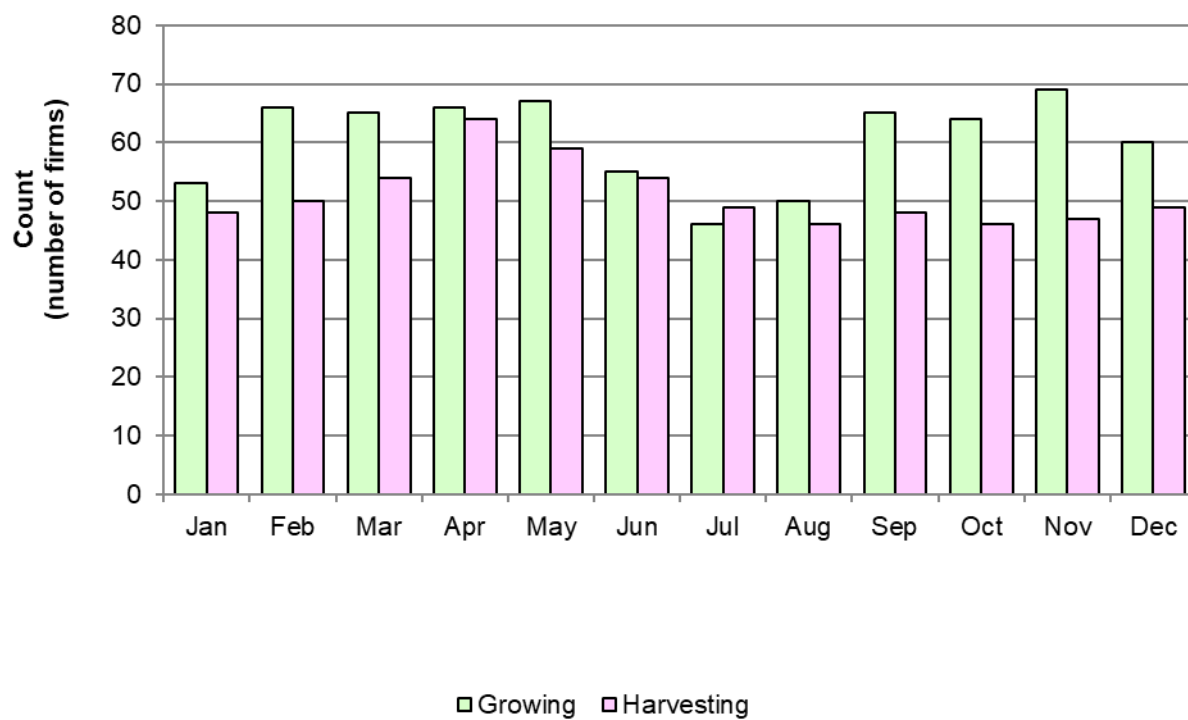
Source: Compiled from data submitted in response to Commission questionnaires.

Figure 4.4 Fresh tomatoes: Count of peak growing and harvesting months for hydroponic growing methods



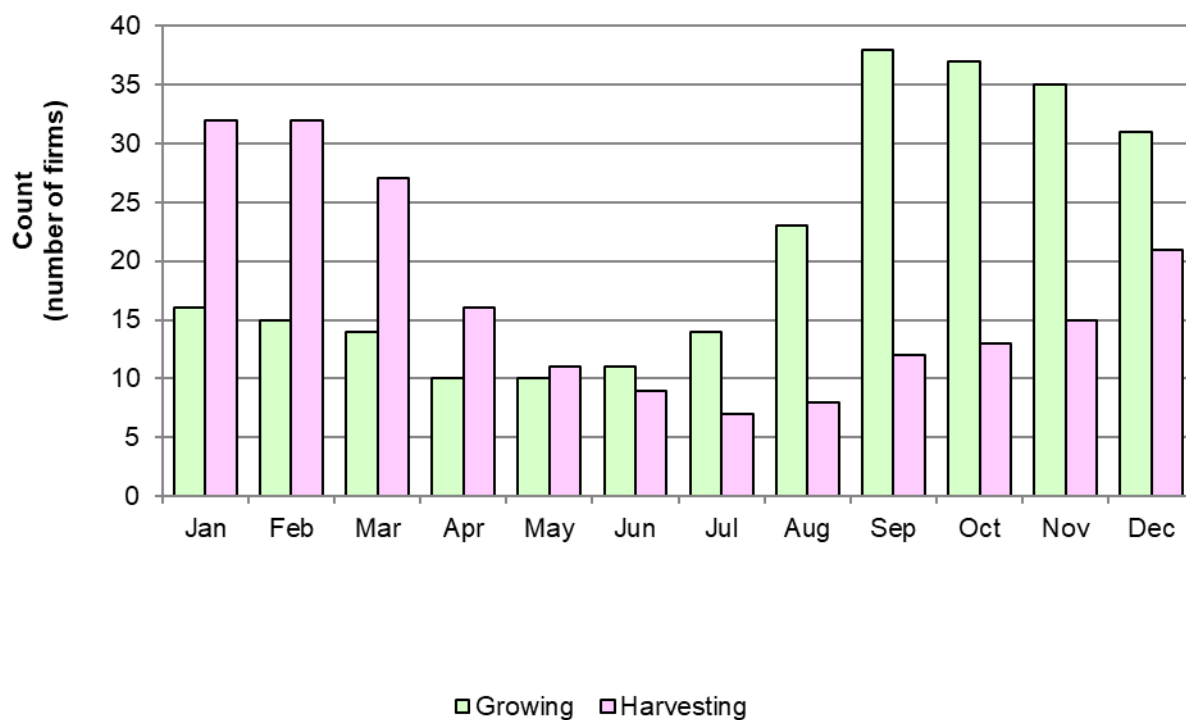
Source: Compiled from data submitted in response to Commission questionnaires.

Figure 4.5 Fresh tomatoes: Count of peak growing and harvesting months for protected growing methods



Source: Compiled from data submitted in response to Commission questionnaires.

Figure 4.6 Fresh tomatoes: Count of peak growing and harvesting months for open field growing methods



Source: Compiled from data submitted in response to Commission questionnaires.

Operations on fresh tomatoes

Table 4.16 presents data on Mexican producers' assigned acreage, by product type and period, table 4.17 presents data on Mexican producers' harvesting related production activities, and table 4.18 presents data on Mexican producers' packing related production activities, by period. At the Commission's hearing, a representative from Kaliroy Fresh (respondents) indicated that "the decreasing availability of farm labor imposes an important constraint on the ability of the Mexican industry tomato to expand."³

Table 4.16: Mexican producers' assigned acreage, by product type and period

Quantity in 1,000 pounds, shares in percent

Product type	Measure	2019	2023	2024	2025	2019-2025 Change
Fresh tomatoes only	Quantity	27,787	32,835	39,050	37,064	▲33.4
Fresh tomatoes and other crops	Quantity	15,984	16,417	17,793	17,032	▲6.6
Other crops only	Quantity	41,653	50,620	50,346	43,655	▲4.8
Left fallow	Quantity	29,697	34,304	32,163	36,097	▲21.5
Total acreage	Quantity	115,121	134,176	139,352	133,848	▲16.3
Fresh tomatoes only	Share	24.1	24.5	28.0	27.7	▲3.6
Fresh tomatoes and other crops	Share	13.9	12.2	12.8	12.7	▼(1.2)
Other crops only	Share	36.2	37.7	36.1	32.6	▼(3.6)
Left fallow	Share	25.8	25.6	23.1	27.0	▲1.2
Total acreage	Share	100.0	100.0	100.0	100.0	—

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "—".

³ Hearing transcript, p. 31 (De La Vega).

Table 4.17: Mexican producers' harvesting production related activities, by period

Quantity in 1,000 pounds; yield in pounds per acre; share in percent; change in percent for quantity and yield lines; change in percentage points for share lines

Product type	Measure	2019	2023	2024	2025	2019-2025 Change
Fresh tomatoes	Quantity	3,299,225	3,968,467	4,071,049	4,138,434	▲25.4
Other crops	Quantity	1,301,555	1,626,781	1,718,732	1,696,019	▲30.3
All crops	Quantity	4,600,780	5,595,248	5,789,781	5,834,453	▲26.8
Fresh tomatoes	Yield	75,375	80,575	71,619	76,502	▲1.5
Other crops	Yield	22,582	24,267	25,224	27,947	▲23.8
All crops	Yield	53,858	56,024	54,015	59,687	▲10.8
Fresh tomatoes	Share	71.7	70.9	70.3	70.9	▲0.8
Other crops	Share	28.3	29.1	29.7	29.1	▼(0.8)
All crops	Share	100.0	100.0	100.0	100.0	—

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "—".

Table 4.18: Mexican producers' packing related production activities, by period

Quantity in 1,000 pounds; share in percent

Product type	Measure	2019	2023	2024	2025	2019-2025 Change
Domestic fresh tomatoes	Quantity	3,210,319	3,823,490	3,896,892	3,983,563	▲24.1
Imported fresh tomatoes	Quantity	9,466	13,759	15,519	16,766	▲77.1
All fresh tomatoes	Quantity	3,219,785	3,837,249	3,912,411	4,000,329	▲24.2
Other crops	Quantity	773,154	1,046,133	1,101,028	1,086,536	▲40.5
All crops	Quantity	3,992,939	4,883,382	5,013,439	5,086,865	▲27.4
Domestic fresh tomatoes	Share	80.4	78.3	77.7	78.3	▼(2.1)
Imported fresh tomatoes	Share	0.2	0.3	0.3	0.3	▲0.1
All fresh tomatoes	Share	80.6	78.6	78.0	78.6	▼(2.0)
Other crops	Share	19.4	21.4	22.0	21.4	▲2.0
All crops	Share	100.0	100.0	100.0	100.0	—

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "—".

Table 4.19 presents aggregate production, exports, shipments, and inventory data for responding producers in Mexico.

Table 4.19 Fresh tomatoes: Data on industry in Mexico, by period

Quantity in 1,000 pounds; value in 1,000 dollars

Item	Measure	2019	2023	2024	2025	2019-2025 Change
Production	Quantity	3,306,219	4,119,028	4,210,641	3,982,933	▲20.5
End-of-period inventories	Quantity	21,009	17,362	19,447	16,760	▼(20.2)
Internal consumption and transfers	Quantity	329,176	332,417	272,154	357,008	▲8.5
Commercial home market shipments	Quantity	630,965	827,656	780,829	802,086	▲27.1
Home market shipments	Quantity	960,141	1,160,074	1,052,983	1,159,094	▲20.7
Export shipments	Quantity	2,335,621	2,966,838	3,163,585	2,826,941	▲21.0
Total shipments	Quantity	3,295,762	4,126,912	4,216,568	3,986,035	▲20.9
Internal consumption and transfers	Value	2,335,555	6,543,626	858,693	199,447	▼(91.5)
Commercial home market shipments	Value	206,752	306,993	379,596	315,411	▲52.6
Home market shipments	Value	2,542,307	6,850,620	1,238,289	514,858	▼(79.7)
Export shipments	Value	1,304,289	1,865,318	2,257,785	1,891,247	▲45.0
Total shipments	Value	3,846,596	8,715,938	3,496,074	2,406,105	▼(37.4)

Table continued

Table 4.19 Fresh tomatoes (continued): Data on industry in Mexico, by period

Unit value in dollars per pound; ratio and shares in percent

Item	Measure	2019	2023	2024	2025	2019-2025 Change
Internal consumption and transfers	Unit value	7.10	19.68	3.16	0.56	▼(92.1)
Commercial home market shipments	Unit value	0.33	0.37	0.49	0.39	▲20.0
Home market shipments	Unit value	2.65	5.91	1.18	0.44	▼(83.2)
Export shipments	Unit value	0.56	0.63	0.71	0.67	▲19.8
Total shipments	Unit value	1.17	2.11	0.83	0.60	▼(48.3)
Inventory ratio to production	Ratio	6.4	0.4	0.5	0.4	▼(5.9)
Inventory ratio to total shipments	Ratio	0.6	0.4	0.5	0.4	▼(0.2)
Internal consumption and transfers	Share	10.0	8.1	6.5	9.0	▼(1.0)
Commercial home market shipments	Share	19.1	20.1	18.5	20.1	▲1.0
Home market shipments	Share	29.1	28.1	25.0	29.1	▼(0.1)
Export shipments	Share	70.9	71.9	75.0	70.9	▲0.1
Total shipments	Share	100.0	100.0	100.0	100.0	—

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "—".

Table 4.20 presents Mexican producers' and resellers' exports from Mexico, by destination market and period. Table 4.21 presents Mexican producers total shipments, by packaging type (bulk, clam shells, trays, and other packing) and period. Table 4.22 presents Mexican producers total shipments, by picking method (vine ripe and/or mature green) and period. Table 4.23 presents Mexican producers' and resellers total shipments, by varietal (round, plum/roma, cherry/grape, and all others), and period.

Table 4.20 Fresh tomatoes: Producers and resellers' exports from Mexico, by destination market and period

Quantity in 1,000 pounds; value in 1,000 dollars; unit value in dollars per pound; share in percent

Destination market	Measure	2019	2023	2024	2025
United States	Quantity	146,504	228,892	238,701	228,381
United States	Value	108,853	181,035	171,726	120,329
United States	Unit value	0.74	0.79	0.72	0.53
United States	Ratio	4.4	5.5	5.7	5.7

Source: Compiled from data submitted in response to Commission questionnaires.

Table 4.21 Fresh tomatoes: Mexican producers' total shipments, by packaging type and period

Quantity in 1,000 pounds; value in 1,000 dollars; unit value in dollars per pound; share in percent

Packaging type	Measure	2019	2025	2019-2025 Change
Bulk	Quantity	2,913,787	3,514,420	▲20.6
Clam shells	Quantity	313,805	456,951	▲45.6
Trays	Quantity	90,104	101,977	▲13.2
Other packaging	Quantity	117,929	127,168	▲7.8
All packaging types	Quantity	3,435,626	4,200,516	▲22.3
Bulk	Share	84.8	83.7	▼(1.1)
Clam shells	Share	9.1	10.9	▲1.7
Trays	Share	2.6	2.4	▼(0.2)
Other packaging	Share	3.4	3.0	▼(0.4)
All packaging types	Share	100.0	100.0	—

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "—".

Table 4.22 Fresh tomatoes: Mexican producers' total shipments, by picking method and period

Quantity in 1,000 pounds; value in 1,000 dollars; unit value in dollars per pound; share in percent

Picking method	Measure	2019	2025	2019-2025 Change
Vine ripe	Quantity	3,234,561	4,006,097	▲23.9
Mature green	Quantity	206,994	195,734	▼(5.4)
All picking methods	Quantity	3,441,555	4,201,831	▲22.1
Vine ripe	Value	3,848,446	2,434,772	▼(36.7)
Mature green	Value	104,977	125,721	▲19.8
All picking methods	Value	3,953,423	2,560,493	▼(35.2)
Vine ripe	Unit value	1.19	0.61	▼(48.9)
Mature green	Unit value	0.51	0.64	▲26.6
All picking methods	Unit value	1.15	0.61	▼(47.0)
Vine ripe	Share of Quantity	94.0	95.3	▲1.4
Mature green	Share of Quantity	6.0	4.7	▼(1.4)
All picking methods	Share of Quantity	100.0	100.0	—
Vine ripe	Share of Value	97.3	95.1	▼(2.3)
Mature green	Share of Value	2.7	4.9	▲2.3
All picking methods	Share of Value	100.0	100.0	—

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "—".

Table 4.23 Fresh tomatoes: Mexican producers' total shipments, by varietal and period

Quantity in 1,000 pounds; value in 1,000 dollars; unit value in dollars per pound; share in percent

Varietal type	Measure	2019	2025	2019-2025 Change
Round	Quantity	996,316	1,008,515	▲1.2
Plum/Roma	Quantity	1,817,905	2,433,832	▲33.9
Cherry/Grape	Quantity	457,127	550,030	▲20.3
Other varieties	Quantity	164,278	208,139	▲26.7
All varieties	Quantity	3,435,626	4,200,516	▲22.3
Round	Share	29.0	24.0	▼(5.0)
Plum/Roma	Share	52.9	57.9	▲5.0
Cherry/Grape	Share	13.3	13.1	▼(0.2)
Other varieties	Share	4.8	5.0	▲0.2
All varieties	Share	100.0	100.0	—

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "—".

Exports

According to GTA, the leading export markets for fresh tomatoes from Mexico are the United States and Canada (table 4.24). In 2025, the United States was the top export market for fresh tomatoes from Mexico, accounting for more than 99 percent of such exports of tomatoes by quantity and value; Canada, the next major export market for Mexico's tomatoes, accounted for less than 0.5 percent by quantity and value. Between 2019 and 2025, Mexico's exports of fresh tomatoes to the United States increased by 9.3 percent in quantity and 26.2 percent in value.

Table 4.24 Fresh tomatoes: Exports from Mexico, by destination market and period

Quantity in 1,000 pounds; value in 1,000 dollars; Unit values in dollars per pound; Shares in percent; Change in percent for quantity, value, and unit value lines; Change in percentage points for share lines.

Destination market	Measure	2019	2023	2024	2025	2019-2025 Change
United States	Quantity	3,987,458	4,423,952	4,540,145	4,358,692	▲9.3
Canada	Quantity	3,897	7,766	4,267	20,834	▲434.6
Japan	Quantity	—	244	96	82	—
Belize	Quantity	—	—	1	1	—
All other destination markets	Quantity	—	—	—	—	—
All destination markets	Quantity	3,991,355	4,431,962	4,544,509	4,379,610	▲9.7
United States	Value	2,090,263	2,982,177	3,328,559	2,637,925	▲26.2
Canada	Value	2,292	5,404	3,175	12,129	▲429.1
Japan	Value	—	174	83	52	—
Belize	Value	—	—	1	1	—
All other destination markets	Value	—	—	—	—	—
All destination markets	Value	2,092,556	2,987,755	3,331,817	2,650,106	▲26.6
United States	Unit value	0.52	0.67	0.73	0.61	▲15.5
Canada	Unit value	0.59	0.70	0.74	0.58	▼(1.0)
Japan	Unit value	—	0.71	0.87	0.63	—
All other destination markets	Unit value	—	—	—	—	—
All destination markets	Unit value	0.52	0.67	0.73	0.61	▲15.4
United States	Share of quantity	99.9	99.8	99.9	99.5	▼(0.4)
Kuwait	Share of quantity	0.1	0.2	0.1	0.5	▲0.4
Hong Kong	Share of quantity	—	0.0	0.0	0.0	▲0.0
Vietnam	Share of quantity	—	—	0.0	0.0	▲0.0
All other destination markets	Share of quantity	—	—	—	—	—
All destination markets	Share of quantity	100.0	100.0	100.0	100.0	—

Source: Official exports statistics under HS subheading 0702.00 as reported by INEGI in the Global Trade Atlas Suite database, accessed April 15, 2026.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "—". United States is shown at the top followed by the top destination markets in descending order of 2025 data.

Third-country trade actions

Based on available information, fresh tomatoes from Mexico have not been subject to other antidumping or countervailing duty investigations outside the United States.

Global market

Table 4.25 presents information on global exports, by reporting country and by period. As of 2025, Mexico remained positioned as the largest source of exported fresh tomatoes, responsible for 29.5 percent of global exports by quantity and 24.3 percent by value in 2025. The next largest exporter by quantity in 2025 was the Netherlands (15.7 percent of global export volume), followed by Morocco (10.4 percent), Spain (8.6 percent), and Turkey (6.0 percent). Between 2019 and 2025, global export value increased by 19.3 percent and global export quantities decreased by 16.4 percent. Exports from Mexico, increased by 26.6 percent in value and 9.7 percent in volume during the same period.

Table 4.25 Fresh tomatoes: Global exports by exporter and period

Quantity in 1,000 pounds; Value in 1,000 dollars; Unit values in dollars per pound; Shares in percent;
Change in percent for quantity, value, and unit value lines; Change in percentage points for share lines.

Exporting country	Measure	2019	2023	2024	2025	2019–25 Change
United States	Quantity	435,042	430,122	467,989	378,076	▼(13.1)
Mexico	Quantity	3,991,355	4,431,962	4,544,509	4,379,610	▲9.7
Netherlands	Quantity	2,399,067	1,905,645	2,046,911	2,329,915	▼(2.9)
Morocco	Quantity	1,295,918	1,452,302	1,691,857	1,549,914	▲19.6
Spain	Quantity	1,709,596	1,263,111	1,512,704	1,283,213	▼(24.9)
Turkey	Quantity	1,178,805	1,292,891	1,084,938	886,676	▼(24.8)
France	Quantity	518,506	702,204	767,925	634,993	▲22.5
Canada	Quantity	389,756	468,082	525,879	538,112	▲38.1
Belgium	Quantity	547,845	447,919	487,907	503,950	▼(8.0)
All other exporters	Quantity	5,319,539	3,557,367	3,833,651	2,384,066	▼(55.2)
All reporting exporters	Quantity	17,785,429	15,951,605	16,964,269	14,868,526	▼(16.4)
United States	Value	292,127	320,294	429,549	274,143	▼(6.2)
Mexico	Value	2,092,556	2,987,755	3,331,817	2,650,106	▲26.6
Netherlands	Value	1,933,524	1,940,121	1,917,297	2,280,915	▲18.0
Morocco	Value	760,237	1,136,551	1,146,796	1,236,256	▲62.6
Spain	Value	1,048,784	1,300,286	1,199,496	1,166,074	▲11.2
Turkey	Value	302,999	535,767	424,828	402,604	▲32.9
France	Value	380,469	794,898	711,370	694,677	▲82.6
Canada	Value	379,281	520,234	606,564	581,953	▲53.4
Belgium	Value	302,155	340,731	374,750	424,431	▲40.5
All other exporters	Value	1,642,673	1,683,916	1,687,553	1,188,230	▼(27.7)
All reporting exporters	Value	9,134,807	11,560,553	11,830,020	10,899,388	▲19.3
United States	Unit value	0.67	0.74	0.92	0.73	▲8.0
Mexico	Unit value	0.52	0.67	0.73	0.61	▲15.4
Netherlands	Unit value	0.81	1.02	0.94	0.98	▲21.5
Morocco	Unit value	0.59	0.78	0.68	0.80	▲36.0
Spain	Unit value	0.61	1.03	0.79	0.91	▲48.1
Turkey	Unit value	0.26	0.41	0.39	0.45	▲76.7
France	Unit value	0.73	1.13	0.93	1.09	▲49.1
Canada	Unit value	0.97	1.11	1.15	1.08	▲11.1
Belgium	Unit value	0.55	0.76	0.77	0.84	▲52.7
All other exporters	Unit value	0.31	0.47	0.44	0.50	▲61.4
All reporting exporters	Unit value	0.51	0.72	0.70	0.73	▲42.7
United States	Share of quantity	2.4	2.7	2.8	2.5	▲0.1
Mexico	Share of quantity	22.4	27.8	26.8	29.5	▲7.0

Table 4.25 Fresh tomatoes (continued): Global exports by exporter and period

Quantity in 1,000 pounds; Value in 1,000 dollars; Unit values in dollars per pound; Shares in percent; Change in percent for quantity, value, and unit value lines; Change in percentage points for share lines.

Exporting country	Measure	2019	2023	2024	2025	2019–25 Change
Netherlands	Share of quantity	13.5	11.9	12.1	15.7	▲2.2
Morocco	Share of quantity	7.3	9.1	10.0	10.4	▲3.1
Spain	Share of quantity	9.6	7.9	8.9	8.6	▼(1.0)
Turkey	Share of quantity	6.6	8.1	6.4	6.0	▼(0.7)
France	Share of quantity	2.9	4.4	4.5	4.3	▲1.4
Canada	Share of quantity	2.2	2.9	3.1	3.6	▲1.4
Belgium	Share of quantity	3.1	2.8	2.9	3.4	▲0.3
All other exporters	Share of quantity	29.9	22.3	22.6	16.0	▼(13.9)
All reporting exporters	Share of quantity	100.0	100.0	100.0	100.0	—

Source: Official export statistics under HS subheading 0702.00, as reported by various national statistical agencies in the Global Trade Atlas database, accessed April 16, 2026.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "—". United States is shown at the top followed by the countries under order, all remaining top exporting countries in descending order of 2025 quantity.

Table 4.26 presents information on exports of fresh tomatoes from Canada, by destination and by period. As of 2025, the United States was the top destination for Canadian tomatoes, accounting for more than 99 percent of Canada's total exports of fresh tomatoes. Between 2019 and 2025, Canadian exports of fresh tomatoes increased by 53.5 percent by quantity and 38.1 percent by value.

Table 4.26 Fresh tomatoes: Exports from Canada, by destination market and by period

Quantity in 1,000 pounds; Value in 1,000 dollars; Unit values in dollars per pound; Shares in percent; Change in percent for quantity, value, and unit value lines; Change in percentage points for share lines.

Destination market	Measure	2019	2023	2024	2025	2019–25 Change
United States	Quantity	374,797	516,085	603,095	578,470	▲54.3
Japan	Quantity	3,569	3,672	2,619	2,589	▼(27.5)
Taiwan	Quantity	710	387	756	968	▲36.4
St. Pierre & Miquelon	Quantity	7	90	94	57	▲730.4
France	Quantity	57	—	0	43	▼(24.9)
Hong Kong	Quantity	132	—	—	35	▼(73.3)
All other destination markets	Quantity	9	0	0	0	▼(100.0)
All destination markets	Quantity	379,281	520,234	606,564	582,162	▲53.5
United States	Value	385,230	463,853	522,699	534,741	▲38.8
Japan	Value	3,606	3,734	2,303	2,489	▼(31.0)
Taiwan	Value	709	385	760	987	▲39.2
St. Pierre & Miquelon	Value	8	106	112	72	▲777.3
France	Value	67	—	0	50	▼(25.2)
Hong Kong	Value	121	—	—	36	▼(70.3)
All other destination markets	Value	11	0	0	—	▼(100.0)
All destination markets	Value	389,753	468,078	525,874	538,375	▲38.1
United States	Unit value	1.03	0.90	0.87	0.92	▼(10.1)
Japan	Unit value	1.01	1.02	0.88	0.96	▼(4.9)
Taiwan	Unit value	1.00	0.99	1.00	1.02	▲2.1
St. Pierre & Miquelon	Unit value	1.20	1.18	1.19	1.26	▲5.6
France	Unit value	1.17	—	1.33	1.17	▼(0.3)
Hong Kong	Unit value	0.92	—	—	1.02	▲10.9
All other destination markets	Unit value	1.16	0.97	1.71	—	▼(100.0)

Table 4.26 Fresh tomatoes (continued): Exports from Canada, by destination market and by period

Quantity in 1,000 pounds; Value in 1,000 dollars; Unit values in dollars per pound; Shares in percent; Change in percent for quantity, value, and unit value lines; Change in percentage points for share lines.

Destination market	Measure	2019	2023	2024	2025	2019–25 Change
All destination markets	Unit value	1.03	0.90	0.87	0.92	▼(10.0)
United States	Share of quantity	98.8	99.2	99.4	99.4	▲0.5
Japan	Share of quantity	0.9	0.7	0.4	0.4	▼(0.5)
Taiwan	Share of quantity	0.2	0.1	0.1	0.2	▼(0.0)
St. Pierre & Miquelon	Share of quantity	0.0	0.0	0.0	0.0	▲0.0
France	Share of quantity	0.0	—	0.0	0.0	▼(0.0)
Hong Kong	Share of quantity	0.0	—	—	0.0	▼(0.0)
All other destination markets	Share of quantity	0.0	0.0	0.0	0.0	▼(0.0)
All destination markets	Share of quantity	100.0	100.0	100.0	100.0	—

Source: Official export statistics under HS subheading 0702.00, as reported by the Canadian statistical authority in the Global Trade Atlas database, accessed April 20, 2026.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "—". United States is shown at the top followed by the top destination markets in descending order of 2025 quantity.

Part 5: Pricing data

Factors affecting prices

Raw material costs

Inputs required to produce tomatoes include land, seeds, fertilizer, and water for irrigation.¹ As noted in the 2019 continued final investigation, input costs are the largest component of the total cost of goods sold (“COGS”) for tomato producers.² In 2019, input costs accounted for 41.1 percent of COGS and increased to 43.0 percent as a share of COGS sold in 2025. In addition, producers and importers were asked if raw material costs had increased between 2019 and 2025, and in July to December 2025 compared with the same period a year earlier. Most responding domestic producers (11 of 15) and nearly half of responding importers (36 of 75) indicated that raw material prices had changed between 2019 and 2025, with increased costs reported by all producers that described the changes. Importers also described inflationary pressures as increased tariffs increasing raw material pricing. Between July to December 2024 and July to December 2025, most responding domestic producers (9 of 15) and slightly less than one-third of responding importers (25 of 77) also indicated that raw material prices had changed, with firms describing increased raw material prices. *** stated that raw material prices have “increased for all inputs across the board – labor, packaging, energy, fuel, water, fertilizers, chemicals, biologicals, growing supplies, tariff impacts, etc.”

Transportation costs to the U.S. market

Transportation costs for fresh tomatoes shipped from Mexico to the United States averaged 4.6 percent during 2025. These estimates were derived from official import data and represent the transportation and other charges on imports.³

¹ “How To Determine Your Cost of Production,” UC ANR Small Farms Network, <https://ucanr.edu/program/uc-anr-small-farms-network/how-determine-your-cost-production>, retrieved April 2, 2026.

² 2019 continued final investigation, p. V-1.

³ The estimated transportation costs were obtained by subtracting the customs value from the c.i.f. value of the imports for 2025 and then dividing by the customs value based on the HTS statistical reporting numbers 7210.11.0000, 7210.12.0000, 7210.50.0000, and 7212.10.0000.

U.S. inland transportation costs

In the 2019 continued final investigation, the majority of responding U.S. producers and importers reported that purchasers typically arrange transportation of their fresh tomato purchases. Inland transportation costs ranged from 6 to 25 percent for U.S. producers and 4 to 30 percent for importers.⁴ Eight U.S. producers and 48 importers reported estimated transportation costs to at least one of the seven regions of the United States listed in table 5.1. U.S. producers reported that their U.S. inland transportation costs averaged from 13.3 to 22.7 percent depending on the region, while most responding importers reported average costs of 9.1 to 20.6 percent depending on the region. Transportation costs to the Southeast were reported to be the lowest on average for domestic producers, but were lowest on average for importers' shipments to the Mountain and Central Southwest regions.

Table 5.1 Fresh tomatoes: Inland transportation costs for domestic and imported fresh tomatoes from Mexico

Region	United States	Mexico
Northeast	15.3	20.6
Midwest	19.3	18.6
Southeast	13.3	12.3
Central Southwest	18.0	9.3
Mountain	19.7	9.1
Pacific Coast	22.7	10.3
Other	15.0	15.3
All regions (except Other)	17.8	13.1

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Other U.S. markets include AK, HI, PR, and VI. Data do not include those reported by producers or importers which submitted data that appeared to be erroneous.

Purchasers were asked whether regional transportation costs had changed between 2019 and 2025, and between July to December 2024 and July to December 2025. A large majority of purchasers (21 of 25) indicated that they had not changed between 2019 and 2025, and an even greater proportion of purchasers (23 of 25) noted that they had not changed between July to December 2024 and July to December 2025. Two purchasers noted increasing transportation costs, and two described increasing regional purchases, with one of these purchasers (***) noting that this increase in regional purchases is an initiative to lower costs.

⁴ 2019 continued final investigation, p. V-1.

Exchange rates

The value of the dollar, relative to the value of the Mexican peso, fluctuated considerably between 2019 and 2025. After being relatively flat in 2019, the U.S. dollar quickly strengthened by more than 30 percent between February and May 2020, then weakened irregularly through April 2024 by almost one-third. It again strengthened by almost 30 percent through mid-January 2025 but then weakened by nearly 15 percent by the end of 2025.⁵

Pricing practices

Pricing methods

In the 2019 continued final investigation, most producers and more than 85 percent of importers reported selling on a transaction-by-transaction basis and more than half of each group also reported selling via contracts. Twenty-five to 30 percent of producers and importers reported selling via price lists.⁶ More than half of responding U.S. producers (9 of 15) and almost two-thirds of responding importers (49 of 75) reported that they had not changed their price-setting methods between 2019 and 2025.⁷ Changes noted by importers included: basing on grower costs in addition to market dynamics; reflecting the price paid to Mexican growers; including antidumping duties (and higher administrative costs); using more market-driven pricing based on supply availability, customer requirements, packaging configuration, and customer programs; and not having to adhere to minimum prices included in the *2019 Suspension Agreement*. Between July to December 2024 and July to December 2025, more responding U.S. producers (11 of 15) reported that they had not changed their price-setting methods and more than half of responding importers (39 of 76) reported doing so. Importers most frequently noted having to include antidumping duties in determining their prices but also described some of the previously mentioned changes like basing prices on grower cost/pricing. Importer *** noted it charges its customers a fee to cover the cost of the duties.

⁵ Source: Federal Reserve Economic Data (FRED), Federal Reserve Bank of St. Louis, <https://fred.stlouisfed.org/series/DEXMXUS>, retrieved April 3, 2026.

⁶ 2019 continued final investigation, table V-1.

⁷ Producers describing changes did not describe actual changes. Producer *** reported that pressure from imports from Mexico had put pressure on contract pricing and producer *** noted that it needed to ensure its “sales team priced accordingly to meet the minimum.” *** noted specifically that its methodology had not changed but market-driven pricing fluctuates.

In the 2019 continued final investigation, a majority of producers' and a plurality of importers' sales of fresh tomatoes were via the spot market, with short-term contracts the second most frequent method of sale for each group as well.⁸ Producers, importers, and purchasers were asked if the shares of sales made on spot vs. contract terms had changed between 2019 and 2025, and between July to December 2024 and July to December 2025. Eighty percent of producers and responding importers, and more than 90 percent of responding purchasers reported that their share of sales sold/purchased on the spot market vs. via contract had not changed between 2019 and 2025, and equal or greater shares did not change between July to December 2024 and July to December 2025. Producer *** noted increasing its contract percentage, *** reported selling 95 percent on the spot market, and *** reported no longer taking on speculative consignment loads to customers because minimum prices are not guaranteed. Six importers reported increasing the share they sell on contract while four reported decreasing their contract sales share.

These three types of firms were also asked whether their contract terms had changed between the two comparative periods. One-third of producers (4 of 15), some responding importers (17 of 76), and 2 of 25 purchasers reported that standard contract terms had changed between 2019 and 2025. Producer *** reported a couple of its customers want weekly instead of seasonal pricing, and *** reported the total number of annual and multi-year contracts have increased. Importer *** also reported increased annual and multi-year contracts, whereas importers *** noted that contracts are for shorter periods, have become more cautious and flexible. Importer *** stated its contract terms are more diverse and importer *** reported its contracts now include specifics related to duties. Only one producer noted changing standard contract terms between July to December 2024 and July to December 2025, whereas 27 of 78 responding importers and 5 of 25 purchasers noting changes between the periods, with most of the changes noted referencing the need to consider the inclusion of antidumping duties.

Foreign producers reported that, in 2025, 32.0 percent of their sales were made on the spot market, 27.6 percent were made via short-term contracts, 22.1 percent via annual contracts, and 18.3 percent via long-term contracts.⁹

⁸ 2019 continued final investigation, table V-2.

⁹ In the 2019 continued final investigation, foreign producers were not asked to report the shares of their sales made via spot sales and contracts.

Purchasers were asked to describe whether they used certain types of programs for their purchases of fresh tomatoes and how their participation in those programs changed between 2019 and 2025. As presented in table 5.2, most purchasers reported using the various types of program arrangements, and between one-third and one-half of responding purchasers indicated that their usage of the programs have been increasing.

Table 5.2 Fresh tomatoes: Count of purchasers' responses regarding changes in usage of program arrangements between 2019 and 2025, by arrangement type

Arrangement type	Increased substantially	Increased somewhat	No change	Decreased somewhat	Decreased substantially	Did not use
Annual/continuity programs	5	3	12	0	0	5
Contract growing programs	7	3	10	1	0	4
Coordinated supply planning	9	1	11	0	0	4
Multi-origin supply programs	3	5	12	0	0	5
Origin-flexible fulfillment/purchasing	3	5	12	0	0	5
Private-label programs	4	5	9	0	1	6
Strategic supply relationship	9	3	8	2	0	3
Year-round account management	6	4	11	0	0	4

Source: Compiled from data submitted in response to Commission questionnaires.

In the 2019 continued final investigation, most purchasers reported that they purchased fresh tomatoes daily, though a few purchased at other frequencies.¹⁰ Most purchasers (21 of 25) reported that their purchasing frequency had not changed between 2019 and 2025, nor had it changed between July to December 2024 and July to December 2025, with one increasing its frequency, one decreasing its frequency, and two not describing how it had changed.

Sales terms and discounts

A large majority of U.S. producers and importers reported typically quoting prices on an f.o.b. basis, as they had in the 2019 continued final investigation.¹¹ A large majority of producers and responding importers also reported that their pricing basis (f.o.b. vs delivered) had not changed between 2019 and 2025 or between July to December 2024 and July to December 2025. Slightly more than half of domestic producers and importers reported offering no discounts in the 2019 continued final investigation, and the remainder reported offering quality defect discounts, condition defect discounts, and other discounts. All but one producer and a large majority of importers in this review also reported that their discount policies had

¹⁰ 2019 continued final investigation, p. V-3.

¹¹ Ibid., p. V-4.

not changed between 2019 and 2025 or between July to December 2024 and July to December 2025.

Price data

The Commission requested U.S. producers and importers to provide quarterly data for the total quantity and f.o.b. value of the following fresh tomato products shipped to unrelated U.S. customers during January 2023 to December 2025.

Product 1.--Mature green plum/Roma tomatoes, 85 percent U.S. #1 or better, bulk packed in 20-pound or above boxes

Product 2.--Vine ripe plum/Roma tomatoes, 85 percent U.S. #1 or better, bulk packed in 20-pound or above boxes

Product 3.--Mature green round tomatoes, packed in two layer or 15-pound or above boxes, 85 percent or better U.S.#1

Product 4.--Vine ripe round tomatoes, packed in two layer or 15-pound or above boxes, 85 percent or better U.S.#1

Product 5.--Mature green cherry/grape tomatoes, packed in one pint clam shells, 12 pints per box, 85 percent or better U.S.#1

Product 6.--Vine ripe cherry/grape tomatoes, packed in one pint clam shells, 12 pints per box, 85 percent or better U.S.#1

Fourteen U.S. producers and 69 importers provided usable pricing data for sales of the requested products, although not all firms reported pricing for all products for all months.¹² Pricing data reported by these firms accounted for approximately 99.0 percent of U.S. producers' U.S. shipments of fresh tomatoes,¹³ and 79.3 percent of U.S. shipments of subject

¹² Per-unit pricing data are calculated from total quantity and total value data provided by U.S. producers and importers. The precision and variation of these figures may be affected by rounding, limited quantities, and producer or importer estimates.

¹³ Small quantities of data received late in the proceeding from domestic producers with negative or infinite prices were not included in the dataset and are not presented in the pricing tables. In addition, related U.S. producer *** provided no pricing data and related U.S. producer *** only provided quarterly pricing data for one product. Removal of these data would result in only small changes to domestic prices.

imports from Mexico in 2025.¹⁴ Price data for products 1 to 4 and product 6 are presented in tables 5.3 to 5.7 and figures 5.1 to 5.5.¹⁵

Table 5.3 Fresh tomatoes: Weighted-average f.o.b. prices and quantities of domestic and imported product 1 and margins of underselling/(overselling), by source and quarter

Price in dollars per pound; quantity in thousands of pounds; margin in percent

Period	U.S. price	U.S. quantity	Mexico price	Mexico quantity	Margin
January 2023	0.48	23,819	0.45	15,386	6.9
February 2023	0.40	20,357	0.39	9,914	1.8
March 2023	0.39	20,071	0.39	8,615	(1.5)
April 2023	0.39	23,840	0.41	8,139	(4.6)
May 2023	0.43	21,713	0.43	5,550	0.8
June 2023	0.59	1,829	0.55	904	7.3
July 2023	0.50	7,527	0.63	1,229	(26.5)
August 2023	0.43	13,878	0.56	2,745	(28.8)
September 2023	0.47	12,168	0.57	3,281	(23.2)
October 2023	0.50	9,991	0.56	3,387	(11.9)
November 2023	0.55	19,096	0.60	845	(7.6)
December 2023	0.77	26,017	1.13	4,227	(47.9)
January 2024	0.98	23,593	0.92	15,099	6.9
February 2024	0.49	16,382	0.53	12,466	(9.0)
March 2024	0.54	15,847	0.60	12,863	(10.4)
April 2024	0.57	22,100	0.58	9,765	(2.2)
May 2024	0.53	30,643	0.62	4,843	(16.6)
June 2024	0.56	4,057	0.48	435	13.9
July 2024	0.64	13,997	0.73	2,441	(13.9)
August 2024	0.52	16,873	0.48	4,921	8.7
September 2024	0.47	14,570	0.50	2,884	(5.0)
October 2024	0.43	6,277	0.72	1,307	(67.1)
November 2024	0.74	8,991	0.75	1,033	(0.9)
December 2024	0.76	25,323	0.80	3,228	(4.5)

Table continued.

¹⁴ Pricing coverage is based on U.S. commercial shipments reported in questionnaires.

¹⁵ Neither U.S. producers nor U.S. importers of fresh tomatoes from Mexico submitted usable data for product 5. Pricing products separations were suggested by respondents NatureSweet and Mexican producers and exporters in their separate Comments on Draft Commission Questionnaires (pp. 8 and 9, and Attachment 1, respectively). In addition, four months of data submitted by two U.S. producers were characterized by uncharacteristically low volumes, uncharacteristic prices (either extremely high or extremely low), and no other U.S. producers submitting data for those months. Due to their aberrational nature, data for these months were not included in the underselling/overselling calculations (July, August, and December 2024 for product 2 and September 2023 for product 4).

Table 5.3 (Continued) Fresh tomatoes: Weighted-average f.o.b. prices and quantities of domestic and imported product 1 and margins of underselling/(overselling), by source and quarter

Price in dollars per pound; quantity in thousands of pounds; margin in percent

Period	U.S. price	U.S. quantity	Mexico price	Mexico quantity	Margin
January 2025	0.50	30,328	0.44	16,392	12.2
February 2025	0.41	21,148	0.35	11,196	13.4
March 2025	0.47	13,258	0.38	13,794	18.4
April 2025	0.41	25,656	0.42	12,626	(1.3)
May 2025	0.48	28,150	0.43	4,911	9.4
June 2025	0.34	16,448	0.58	608	(71.1)
July 2025	0.54	16,511	0.55	1,265	(2.9)
August 2025	0.46	15,904	0.47	4,266	(0.9)
September 2025	0.43	15,151	0.55	1,885	(29.3)
October 2025	0.48	16,651	0.56	1,949	(17.0)
November 2025	0.52	13,584	0.64	2,397	(22.0)
December 2025	0.46	45,526	0.60	3,340	(30.9)

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Product 1: Mature green plum/Roma tomatoes, 85 percent U.S. #1 or better, bulk packed in 20-pound or above boxes.

Table 5.4 Fresh tomatoes: Weighted-average f.o.b. prices and quantities of domestic and imported product 2 and margins of underselling/(overselling), by source and quarter

Price in dollars per pound; quantity in thousands of pounds; margin in percent

Period	U.S. price	U.S. quantity	Mexico price	Mexico quantity	Margin
January 2023	***	***	0.49	114,267	***
February 2023	***	***	0.44	95,493	***
March 2023	***	***	0.43	111,745	***
April 2023	***	***	0.45	93,345	***
May 2023	***	***	0.46	114,326	***
June 2023	***	***	0.47	123,662	***
July 2023	***	***	0.55	99,076	***
August 2023	***	***	0.56	89,738	***
September 2023	***	***	0.58	80,283	***
October 2023	***	***	0.59	85,779	***
November 2023	***	***	0.65	94,042	***
December 2023	***	***	0.92	83,188	***
January 2024	***	***	0.84	96,644	***
February 2024	***	***	0.43	111,809	***
March 2024	***	***	0.49	105,427	***
April 2024	***	***	0.55	114,113	***
May 2024	***	***	0.52	128,710	***
June 2024	***	***	0.55	117,661	***
July 2024	—	0	0.73	101,009	—
August 2024	***	***	0.56	100,789	***
September 2024	***	***	0.53	79,797	***
October 2024	***	***	0.69	93,452	***
November 2024	***	***	0.77	105,998	***
December 2024	***	***	0.72	116,020	***
January 2025	0.41	657	0.47	122,550	(15.0)
February 2025	***	***	0.37	109,078	***
March 2025	***	***	0.42	125,838	***
April 2025	***	***	0.43	120,966	***
May 2025	***	***	0.45	123,989	***
June 2025	0.36	167	0.42	123,885	(15.5)
July 2025	—	0	0.50	109,104	—
August 2025	***	***	0.47	100,041	***
September 2025	***	***	0.50	88,866	***
October 2025	***	***	0.53	89,561	***
November 2025	0.51	1,965	0.59	87,154	(17.2)
December 2025	***	***	0.57	106,624	***

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Product 2: Vine ripe plum/Roma tomatoes, 85 percent U.S. #1 or better, bulk packed in 20-pound or above boxes.

Table 5.5 Fresh tomatoes: Weighted-average f.o.b. prices and quantities of domestic and imported product 3 and margins of underselling/(overselling), by source and quarter

Price in dollars per pound; quantity in thousands of pounds; margin in percent

Period	U.S. price	U.S. quantity	Mexico price	Mexico quantity	Margin
January 2023	0.54	46,267	***	***	***
February 2023	0.40	56,376	***	***	***
March 2023	0.35	63,179	***	***	***
April 2023	0.31	59,631	***	***	***
May 2023	0.50	50,395	***	***	***
June 2023	0.53	42,053	***	***	***
July 2023	0.43	42,713	***	***	***
August 2023	0.43	48,213	***	***	***
September 2023	0.44	32,355	***	***	***
October 2023	0.48	42,804	***	***	***
November 2023	0.61	43,220	***	***	***
December 2023	0.62	58,664	***	***	***
January 2024	0.81	56,380	***	***	***
February 2024	0.95	48,504	***	***	***
March 2024	0.71	44,636	***	***	***
April 2024	0.82	49,652	***	***	***
May 2024	0.51	69,320	***	***	***
June 2024	0.48	39,508	***	***	***
July 2024	0.49	48,593	***	***	***
August 2024	0.61	31,214	***	***	***
September 2024	0.46	33,664	***	***	***
October 2024	0.58	37,184	***	***	***
November 2024	0.90	39,179	***	***	***
December 2024	0.98	33,373	***	***	***
January 2025	0.39	48,229	***	***	***
February 2025	0.31	60,060	***	***	***
March 2025	0.41	40,127	***	***	***
April 2025	0.32	71,769	***	***	***
May 2025	0.43	56,793	***	***	***
June 2025	0.33	36,755	***	***	***
July 2025	0.38	41,680	***	***	***
August 2025	0.58	42,469	***	***	***
September 2025	0.38	36,202	***	***	***
October 2025	0.46	29,178	***	***	***
November 2025	0.37	50,749	***	***	***
December 2025	0.41	59,148	***	***	***

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Product 3: Mature green round tomatoes, packed in two layer or 15-pound or above boxes, 85 percent or better U.S.#1.

Table 5.6 Fresh tomatoes: Weighted-average f.o.b. prices and quantities of domestic and imported product 4 and margins of underselling/(overselling), by source and quarter

Price in dollars per pound; quantity in thousands of pounds; margin in percent

Period	U.S. price	U.S. quantity	Mexico price	Mexico quantity	Margin
January 2023	0.87	1,760	0.76	48,556	12.9
February 2023	0.78	1,410	0.47	50,942	38.9
March 2023	0.69	1,731	0.45	60,254	34.3
April 2023	0.53	2,476	0.43	51,275	18.3
May 2023	0.65	2,394	0.51	47,017	20.6
June 2023	***	***	0.53	55,292	***
July 2023	***	***	0.65	39,432	***
August 2023	***	***	0.61	38,203	***
September 2023	***	***	0.55	45,504	***
October 2023	***	***	0.54	52,526	***
November 2023	0.55	9,055	0.68	45,894	(23.2)
December 2023	0.75	4,430	0.79	52,775	(5.8)
January 2024	1.04	2,930	0.89	49,295	14.4
February 2024	***	***	0.75	57,589	***
March 2024	1.13	4,001	0.64	62,837	43.3
April 2024	0.98	4,970	0.77	52,004	21.3
May 2024	0.74	5,968	0.59	44,386	20.6
June 2024	***	***	0.52	47,362	***
July 2024	***	***	0.73	42,212	***
August 2024	***	***	0.77	47,594	***
September 2024	***	***	0.56	57,981	***
October 2024	***	***	0.73	57,797	***
November 2024	***	***	1.08	57,932	***
December 2024	***	***	1.05	57,644	***
January 2025	1.09	3,802	0.58	53,550	46.9
February 2025	0.99	3,588	0.43	48,072	56.1
March 2025	0.94	4,506	0.52	53,649	44.2
April 2025	***	***	0.48	44,482	***
May 2025	0.74	5,923	0.55	46,449	25.5
June 2025	***	***	0.46	45,670	***
July 2025	***	***	0.58	41,169	***
August 2025	***	***	0.67	44,436	***
September 2025	***	***	0.51	54,105	***
October 2025	0.58	14,692	0.53	52,672	8.5
November 2025	0.53	7,105	0.53	45,368	0.7
December 2025	0.78	4,849	0.52	49,694	33.7

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Product 4: Vine ripe round tomatoes, packed in two layer or 15-pound or above boxes, 85 percent or better U.S.#1.

Table 5.7 Fresh tomatoes: Weighted-average f.o.b. prices and quantities of domestic and imported product 6 and margins of underselling/(overselling), by source and quarter

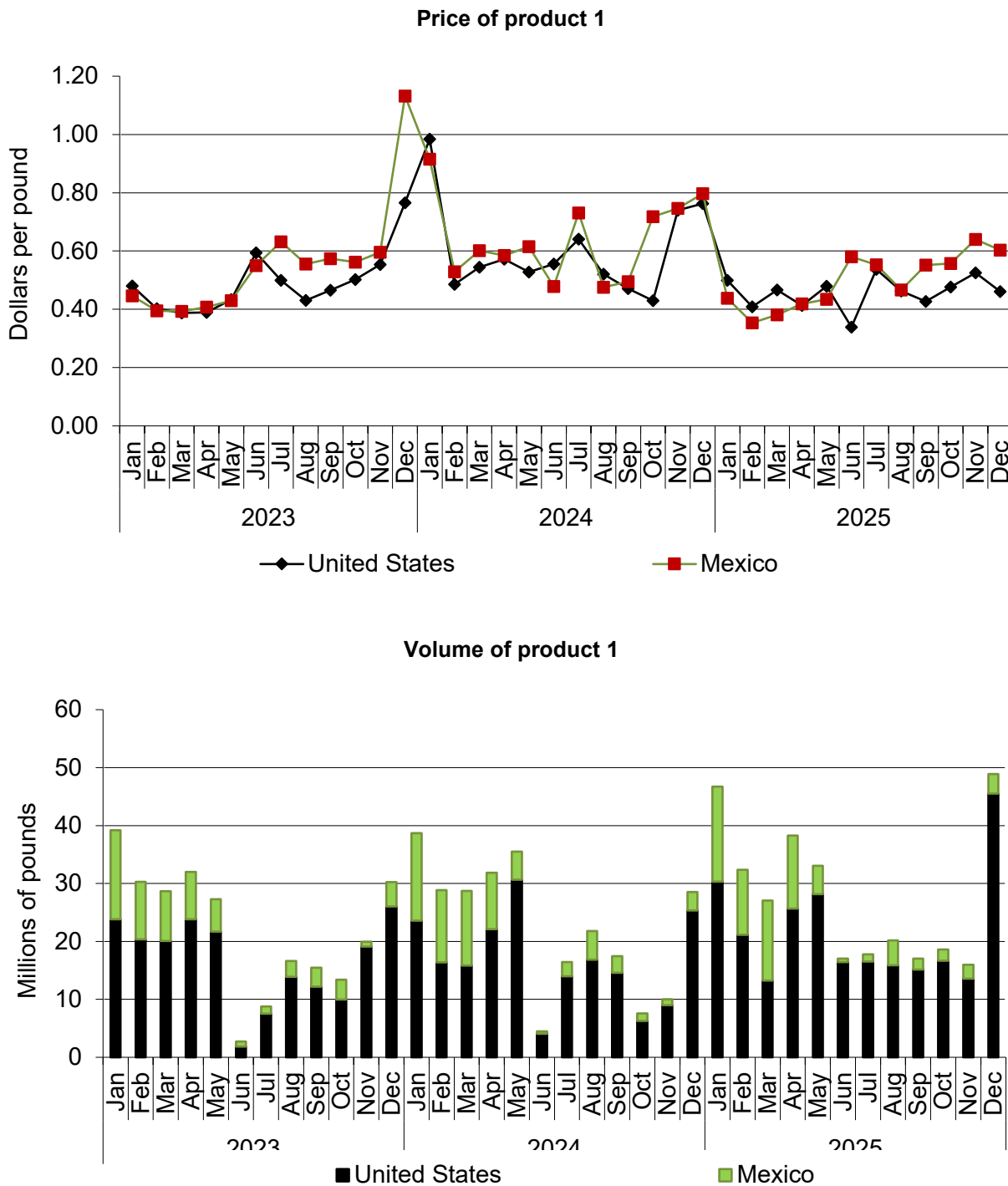
Price in dollars per pound; quantity in thousands of pounds; margin in percent

Period	U.S. price	U.S. quantity	Mexico price	Mexico quantity	Margin
January 2023	***	***	1.80	27,779	***
February 2023	***	***	1.72	28,430	***
March 2023	***	***	1.76	31,165	***
April 2023	***	***	1.73	25,665	***
May 2023	***	***	1.78	24,397	***
June 2023	***	***	1.95	27,190	***
July 2023	***	***	1.96	22,228	***
August 2023	***	***	1.99	20,148	***
September 2023	***	***	1.98	22,798	***
October 2023	***	***	2.00	21,251	***
November 2023	***	***	2.19	20,454	***
December 2023	***	***	2.37	24,764	***
January 2024	***	***	2.50	20,174	***
February 2024	***	***	2.19	26,928	***
March 2024	***	***	2.04	32,702	***
April 2024	***	***	1.83	29,066	***
May 2024	***	***	1.86	26,266	***
June 2024	***	***	1.98	27,516	***
July 2024	***	***	2.17	20,522	***
August 2024	***	***	2.01	20,579	***
September 2024	***	***	2.01	23,221	***
October 2024	***	***	1.95	23,260	***
November 2024	***	***	2.10	24,311	***
December 2024	***	***	2.21	27,761	***
January 2025	***	***	1.85	31,234	***
February 2025	***	***	1.82	28,453	***
March 2025	***	***	1.86	33,537	***
April 2025	***	***	1.86	27,330	***
May 2025	***	***	1.84	26,921	***
June 2025	***	***	2.02	27,306	***
July 2025	***	***	2.12	21,662	***
August 2025	***	***	2.13	25,001	***
September 2025	***	***	2.02	21,481	***
October 2025	***	***	1.99	22,770	***
November 2025	***	***	2.10	20,982	***
December 2025	***	***	2.13	27,869	***

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Product 6: Vine ripe cherry/grape tomatoes, packed in one pint clam shells, 12 pints per box, 85 percent or better U.S.#1.

Figure 5.1 Fresh tomatoes: Weighted-average prices and quantities of domestic and imported product 1, by source and quarter



Source: Compiled from data submitted in response to Commission questionnaires.

Note: Product 1: Mature green plum/Roma tomatoes, 85 percent U.S. #1 or better, bulk packed in 20-pound or above boxes.

Figure 5.2 Fresh tomatoes: Weighted-average prices and quantities of domestic and imported product 2, by source and quarter

Price of product 2

* * * * *

Volume of product 2

* * * * *

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Note: Product 2: Vine ripe plum/Roma tomatoes, 85 percent U.S. #1 or better, bulk packed in 20-pound or above boxes.

Figure 5.3 Fresh tomatoes: Weighted-average prices and quantities of domestic and imported product 3, by source and quarter

Price of product 3

* * * * *

Volume of product 3

* * * * *

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Product 3: Mature green round tomatoes, packed in two layer or 15-pound or above boxes, 85 percent or better U.S.#1.

Figure 5.4 Fresh tomatoes: Weighted-average prices and quantities of domestic and imported product 4, by source and quarter

Price of product 4

* * * * *

Volume of product 4

* * * * *

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Product 4: Vine ripe round tomatoes, packed in two layer or 15-pound or above boxes, 85 percent or better U.S.#1.

Figure 5.5 Fresh tomatoes: Weighted-average prices and quantities of domestic and imported product 6, by source and quarter

Price of product 6

* * * * *

Volume of product 6

* * * * *

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Product 6: Vine ripe cherry/grape tomatoes, packed in one pint clam shells, 12 pints per box, 85 percent or better U.S.#1.

Price trends

In general, price changes were mixed during January 2023 to December 2025. Table 5.8 summarizes the price trends, by country and by product. As shown in the table, domestic prices changes ranged from a decrease of 24.9 percent to an increase of *** percent.¹⁶ Prices for fresh tomatoes imported from Mexico also had large price change differences – from a decrease of 31.9 percent to an increase of 35.0 percent. As shown in tables 5.3 to 5.7, the monthly price swings in the fresh tomato industry can be large and sensitive to seasonality and weather issues.¹⁷

Table 5.8 Fresh tomatoes: Summary of price data, by product and source, January 2023 to December 2025

Quantity in thousands of pounds, price in dollars per pound

Product	Source	Number of quarters	Quantity of shipments	Low price	High price	First quarter price	Last quarter price	Percent change in price
Product 1	United States	36	657,275	0.34	0.98	0.48	0.46	(4.0)
Product 1	Mexico	36	210,135	0.35	1.13	0.45	0.60	35.0
Product 2	United States	34	***	***	***	***	***	***
Product 2	Mexico	36	3,764,030	0.37	0.92	0.49	0.57	15.5
Product 3	United States	36	1,690,237	0.31	0.98	0.54	0.41	(24.9)
Product 3	Mexico	36	***	***	***	***	***	***
Product 4	United States	36	***	***	***	***	***	***
Product 4	Mexico	36	1,801,619	0.43	1.08	0.76	0.52	(31.9)
Product 5	United States	0	—	—	—	—	—	—
Product 5	Mexico	0	—	—	—	—	—	—
Product 6	United States	36	***	***	***	***	***	***
Product 6	Mexico	36	913,122	1.72	2.50	1.80	2.13	18.9

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Percent change column is percentage change from January 2023 to December 2025.

¹⁶ The exclusion of *** would affect solely *** from the United States, decreasing the quantity by ***, the last month price to \$*** per pound and the price change over the period to a *** percent increase.

¹⁷ Monthly price swings of greater than 10 percent occurred in a majority of months for both domestic and Mexican prices. For example, droughts or freezes can decrease availability of fresh tomatoes, as can the months containing the start or end of harvests.

Price comparisons¹⁸

As shown in tables 5.9 and 5.10, prices for fresh tomatoes imported from Mexico were below those for U.S.-produced product in 55 of 178 instances (2.7 billion pounds);¹⁹ margins of underselling ranged from 0.6 to 56.1 percent. In the remaining 123 instances (3.8 billion pounds), prices for fresh tomatoes from Mexico were between 0.1 and 192.2 percent above prices for the domestic product. Most of the domestic sales occurred during quarters of import overselling. Underselling was present primarily in product 4 (vine-ripe rounds), whereas overselling was most frequent in products 3 and 6 (mature green rounds and vine-ripe cherry/grape tomatoes). A plurality of the quarters of underselling (22 of 55) occurred in 2024.

Table 5.9 Fresh tomatoes: Instances of underselling and overselling and the range and average margins, by product

Quantity in thousands of pounds; margin in percent

Product	Type	Number of months	Import quantity	U.S. quantity	Average margin	Min margin	Max margin
Product 1	Underselling	11	98,502	205,125	9.1	0.8	18.4
Product 2	Underselling	12	***	***	***	***	***
Product 3	Underselling	3	***	***	***	***	***
Product 4	Underselling	26	***	***	***	***	***
Product 5	Underselling	0	—	—	—	—	—
Product 6	Underselling	3	***	***	***	***	***
All products	Underselling	55	2,702,143	501,856	20.6	0.6	56.1
Product 1	Overselling	25	111,634	452,150	(18.3)	(0.9)	(71.1)
Product 2	Overselling	22	***	***	***	***	***
Product 3	Overselling	33	***	***	***	***	***
Product 4	Overselling	10	***	***	***	***	***
Product 5	Overselling	0	—	—	—	—	—
Product 6	Overselling	33	***	***	***	***	***
All products	Overselling	123	3,808,934	2,319,155	(47.4)	(0.1)	(192.2)

Source: Compiled from data submitted in response to Commission questionnaires.

Note: These data include only months in which there is a comparison between the U.S. and subject product. The large maximum margin of overselling is due to a small quantity of fresh tomatoes sold at a low price during a month at the end of a growing season.

¹⁸ In the original investigations, subject imports from Mexico were priced lower than domestic product in 130 of 227 comparisons, with underselling margins ranging from 0.2 to 84.2 percent. Though there were fewer instances of underselling, the quantity undersold (2.01 billion pounds) was slightly lower than the quantity oversold (2.17 billion pounds) during January 2016 to March 2019. 2019 continued final investigation, p. V-23.

¹⁹ Exclusion of data from *** results in no changes to the number of quarters of underselling or quantities undersold, and small changes to the average margins.

Table 5.10 Fresh tomatoes: Instances of underselling and overselling and the range and average margins, by year

Quantity in thousands of pounds; margin in percent

Period	Type	Number of months	Quantity	Average margin	Min margin	Max margin
2023 January to June	Underselling	10	***	***	***	***
2023 July to December	Underselling	4	***	***	***	***
2023 Total	Underselling	14	***	***	***	***
2024 January to June	Underselling	15	***	***	***	***
2024 July to December	Underselling	7	***	***	***	***
2024 Total	Underselling	22	***	***	***	***
2025 January to June	Underselling	11	***	***	***	***
2025 July to December	Underselling	8	***	***	***	***
2025 Total	Underselling	19	***	***	***	***
All periods	Underselling	55	2,702,143	20.6	0.6	56.1
2023 January to June	Overselling	20	***	***	***	***
2023 July to December	Overselling	26	***	***	***	***
2023 Total	Overselling	46	***	***	***	***
2024 January to June	Overselling	15	***	***	***	***
2024 July to December	Overselling	22	***	***	***	***
2024 Total	Overselling	37	***	***	***	***
2025 January to June	Overselling	19	***	***	***	***
2025 July to December	Overselling	21	***	***	***	***
2025 Total	Overselling	40	***	***	***	***
All periods	Overselling	122	3,808,934	(47.4)	(0.1)	(192.2)

Source: Compiled from data submitted in response to Commission questionnaires.

Note: These data include only quarters in which there is a comparison between the U.S. and subject product.

Additional price analyses

In addition to the pricing data collected by the six designations listed above, the Commission also requested data regarding the share of producers' and importers' commercial sales that were grown via three cultivation methods: controlled environment hydroponic, protected culture, and open field for 2025. Appendix G presents aggregations of firms' data for the above pricing products in 2025 based upon their responses to the shares of their production using these three cultivation methods. Since not all pricing products were grown using all the cultivation methods, the appendix presents data for only products for which data are available.

In its response to the Commission’s Request for Comments on the Draft Questionnaire, the domestic interested party indicated that there is competition between mature green and vine ripe fresh tomatoes.²⁰ Presented in tables 5.11 and 5.12 and in figures 5.6 and 5.7 are data for products 1 and 2 combined into an “all Roma/plum” fresh tomato category and for products 3 and 4 combined into an “all Round” fresh tomato category. As there were no reported pricing data for product 5, the data for product 6 comprises the data for the “all cherry/grape” fresh tomato category, with data previously presented in table 5.7 and figure 5.5.

²⁰ FTE’s Comments on Draft Questionnaires, pp. 10–13.

Table 5.11 Fresh tomatoes: Weighted-average f.o.b. prices and quantities of all domestic and imported Roma/plum products and margins of underselling/(overselling), by source and quarter

Price in dollars per pound; quantity in thousands of pounds; margin in percent

Period	U.S. price	U.S. quantity	Mexico price	Mexico quantity	Margin
January 2023	***	***	0.49	129,654	***
February 2023	***	***	0.44	105,407	***
March 2023	***	***	0.43	120,359	***
April 2023	***	***	0.44	101,483	***
May 2023	***	***	0.46	119,876	***
June 2023	***	***	0.47	124,566	***
July 2023	***	***	0.55	100,305	***
August 2023	***	***	0.56	92,483	***
September 2023	***	***	0.58	83,565	***
October 2023	***	***	0.59	89,166	***
November 2023	***	***	0.65	94,887	***
December 2023	***	***	0.93	87,416	***
January 2024	***	***	0.85	111,743	***
February 2024	***	***	0.44	124,275	***
March 2024	***	***	0.50	118,290	***
April 2024	***	***	0.55	123,878	***
May 2024	***	***	0.52	133,553	***
June 2024	***	***	0.55	118,096	***
July 2024	***	***	0.73	103,449	***
August 2024	***	***	0.55	105,710	***
September 2024	***	***	0.53	82,681	***
October 2024	***	***	0.69	94,759	***
November 2024	***	***	0.77	107,032	***
December 2024	***	***	0.72	119,247	***
January 2025	***	***	0.47	138,943	***
February 2025	***	***	0.37	120,274	***
March 2025	***	***	0.42	139,632	***
April 2025	***	***	0.43	133,592	***
May 2025	***	***	0.45	128,900	***
June 2025	***	***	0.42	124,492	***
July 2025	***	***	0.50	110,370	***
August 2025	***	***	0.47	104,307	***
September 2025	***	***	0.51	90,751	***
October 2025	***	***	0.53	91,510	***
November 2025	***	***	0.59	89,551	***
December 2025	***	***	0.57	109,964	***

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Products 1 and 2: Mature green and vine ripe plum/Roma tomatoes, 85 percent U.S. #1 or better, bulk packed in 20-pound or above boxes.

Table 5.12 Fresh tomatoes: Weighted-average f.o.b. prices and quantities of all domestic and imported round products and margins of underselling/(overselling), by source and quarter

Price in dollars per pound; quantity in thousands of pounds; margin in percent

Period	U.S. price	U.S. quantity	Mexico price	Mexico quantity	Margin
January 2023	0.56	48,028	***	***	***
February 2023	0.41	57,786	***	***	***
March 2023	0.36	64,910	***	***	***
April 2023	0.31	62,107	***	***	***
May 2023	0.51	52,789	***	***	***
June 2023	***	***	***	***	***
July 2023	***	***	***	***	***
August 2023	***	***	***	***	***
September 2023	***	***	***	***	***
October 2023	***	***	***	***	***
November 2023	0.60	52,275	***	***	***
December 2023	0.62	63,094	***	***	***
January 2024	0.82	59,310	***	***	***
February 2024	***	***	***	***	***
March 2024	0.74	48,637	***	***	***
April 2024	0.83	54,622	***	***	***
May 2024	0.53	75,288	***	***	***
June 2024	***	***	***	***	***
July 2024	***	***	***	***	***
August 2024	***	***	***	***	***
September 2024	***	***	***	***	***
October 2024	***	***	***	***	***
November 2024	***	***	***	***	***
December 2024	***	***	***	***	***
January 2025	0.44	52,031	***	***	***
February 2025	0.35	63,648	***	***	***
March 2025	0.46	44,633	***	***	***
April 2025	***	***	***	***	***
May 2025	0.46	62,716	***	***	***
June 2025	***	***	***	***	***
July 2025	***	***	***	***	***
August 2025	***	***	***	***	***
September 2025	***	***	***	***	***
October 2025	0.50	43,871	***	***	***
November 2025	0.39	57,853	***	***	***
December 2025	0.44	63,997	***	***	***

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Products 3 and 4: Mature green and vine-ripe round tomatoes, packed in two layer or 15-pound or above boxes, 85 percent or better U.S.#1.

Figure 5.6 Fresh tomatoes: Weighted-average prices and quantities of all domestic and imported Roma/plum products, by source and quarter

Price of products 1 and 2

* * * * *

Volume of products 1 and 2

* * * * *

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Product 1 and 2 : Mature green and vine ripe plum/Roma tomatoes, 85 percent U.S. #1 or better, bulk packed in 20-pound or above boxes.

Figure 5.7 Fresh tomatoes: Weighted-average prices and quantities of domestic and imported round products, by source and quarter

Price of products 3 and 4

* * * * *

Volume of products 3 and 4

* * * * *

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Products 3 and 4: Mature green and vine-ripe round tomatoes, packed in two layer or 15-pound or above boxes, 85 percent or better U.S.#1.

As shown in table 5.13, when products are combined there was a relatively greater share of quarters in which overselling occurred. Prices for fresh tomatoes imported from Mexico were below those for U.S.-produced product in 19 of 108 instances with margins of underselling ranging from 1.4 to 24.3 percent and averaging 10.6 percent. In the remaining 89 instances, prices for fresh tomatoes from Mexico were between 1.0 and 94.0 percent above prices for the domestic product. Overselling outpaced underselling in each year (table 5.14).

Table 5.13 Fresh tomatoes: Instances of underselling and overselling and the range and average margins for combined Roma/plum products (1 & 2), round products (3 & 4), and cherry/grape products (5 & 6), by product

Quantity in thousands of pounds; margin in percent

Product	Type	Number of quarters	Quantity	Average margin	Min margin	Max margin
Roma/plum (1 & 2)	Underselling	12	***	***	***	***
Round (3 & 4)	Underselling	4	***	***	***	***
Cherry/grape (5 & 6)	Underselling	3	***	***	***	***
All products	Underselling	19	1,799,330	10.6	1.4	24.3
Roma/plum (1 & 2)	Overselling	24	***	***	***	***
Round (3 & 4)	Overselling	32	***	***	***	***
Cherry/grape (5 & 6)	Overselling	33	***	***	***	***
All products	Overselling	89	4,921,860	(31.2)	(1.0)	(94.0)

Source: Compiled from data submitted in response to Commission questionnaires.

Note: These data include only months in which there is a comparison between the U.S. and subject product.

Table 5.14 Fresh tomatoes: Instances of underselling and overselling and the range and average margins for combined Roma/plum products (1 & 2), round products (3 & 4), and cherry/grape products (5 & 6), by year

Quantity in pounds; margin in percent

Year	Type	Number of quarters	Quantity	Average margin	Min margin	Max margin
2023	Underselling	2	***	***	***	***
2024	Underselling	12	***	***	***	***
2025	Underselling	5	***	***	***	***
All years	Underselling	19	1,799,330	10.6	1.4	24.3
2023	Overselling	34	***	***	***	***
2024	Overselling	24	***	***	***	***
2025	Overselling	31	***	***	***	***
All years	Overselling	89	4,921,860	(31.2)	(1.0)	(94.0)

Source: Compiled from data submitted in response to Commission questionnaires.

Note: These data include only quarters in which there is a comparison between the U.S. and subject product.

Price comparisons between Mexico and the United States

When asked to compare the prices of fresh tomatoes in the United States to those in their home market and third-country markets, most foreign producers that compared the level of prices between Mexico and the United States reported that U.S. prices were higher, with estimates generally estimated to be in the 15 to 50 percent range, but some noted that prices can be more than twice as high. Some noted that the typical fresh tomato, however, is of a lower quality than those exported to the United States. A minority of foreign producers indicated that prices were the same in both markets, and foreign producer *** stated that sometimes prices in either market can be higher. Some foreign producers noted that prices are set based on supply and demand but did not offer comparisons. Some foreign producers highlighted the seasonal nature of some fresh tomato production in Mexico, and focused on the winter (e.g., December to March) tomato harvest. The few foreign producers that compared Mexican prices to third-country prices presented examples showing that prices for markets like Canada and the EU were between Mexican and U.S. prices. Others noted that pricing depends on what the third-country market is, which is due to differences in tariffs, transportation costs, logistics costs, and required quality standards, among others. When asked whether there were significant changes in price comparisons between 2019 and 2025, more than three-quarters of foreign producers (136 of 181) indicated that there were no changes. When similarly asked to compare changes in July to December 2024 with July to December 2025, however, almost half (84 of 186) of foreign producers indicated that there were changes in pricing comparisons. The lifting of the *2019 Suspension Agreement* was reported by multiple foreign producers as decreasing prices, but also reported by multiple foreign producers as increasing prices; more foreign producers reported decreased prices than increased prices. Some foreign producers provided more detail regarding the effects beyond the effect on prices, including reduced exports to the United States, increased home-market sales, reduced acreage in tomato cultivation and/or low production, closed tomato production operations, increased market uncertainty, increased production costs, lower profit margins, “severe economic pressure” due to the implementation of the tariff, high prices seen during the winter “only lasted a week at most,” increased administrative costs, and high volatility in tomato prices.

APPENDIX A

FEDERAL REGISTER NOTICES

The Commission makes available notices relevant to its investigations and reviews on its website, www.usitc.gov. In addition, the following tabulation presents, in chronological order, Federal Register notices issued by the Commission and Commerce during the current proceeding.

Citation	Title	Link
91 FR 3216, January 26, 2026	<i>Fresh Tomatoes From Mexico; Institution and Scheduling of Review Investigation Concerning the Commission's Affirmative Determination in Investigation No. 731-TA-747 (Final), Fresh Tomatoes From Mexico</i>	https://www.govinfo.gov/content/pkg/FR-2026-01-26/pdf/2026-01387.pdf
91 FR 7439, February 18, 2026	<i>Fresh Tomatoes From Mexico: Final Clarification of the Scope of the Antidumping Duty Order</i>	https://www.govinfo.gov/content/pkg/FR-2026-02-18/pdf/2026-03195.pdf
91 FR 16639. April 2, 2026	<i>Fresh Tomatoes From Mexico: Extension of Deadline To Certify</i>	https://www.govinfo.gov/content/pkg/FR-2026-04-02/pdf/2026-06420.pdf

APPENDIX B

LIST OF HEARING WITNESSES

CALENDAR OF PUBLIC HEARING

Those listed below appeared as witnesses at the United States International Trade Commission's hearing:

Subject: Fresh Tomatoes from Mexico
Inv. No.: 751-TA-30
Date and Time: May 19, 2026 – 9:30 a.m.

Sessions were held in connection with this proceeding in the Main Hearing Room (Room 101), 500 E Street, SW., Washington, DC.

OPENING REMARKS:

In Opposition to Continuation (**Michael Chapman**, Winton & Chapman PLLC)
In Support of Continuation (**Nicole Brunda**, Cassidy Levy Kent LLP)

In Opposition to the Continuation of the Antidumping Order:

Winton & Chapman PLLC
Washington, DC
on behalf of

Asociación Mexicana de Horticultura Protegida, A.C. ("AMHPAC")
Confederación de Asociaciones Agrícolas del Estado de Sinaloa, A.C. ("CIDH-CAADES")
Consejo Agrícola de Baja California ("CABC")
A.C., Asociación de Productores de Hortalizas del Yaqui y Mayo ("APHYM")
Sistema Producto Tomate ("SPT")
(collectively "the Associations")

Mario Haroldo Robles Escalante, General Manager, CIDH-CAADES

Arturo Paredes Peimbert, President, CIDH-CAADES

Alberto Cruz Elías Calles, President, APYHM

Salvador García Valdés, Managing Member of San Vicente Camalu and
Counsellor and Ex-president of CABC

Eduardo de la Vega, President, Kaliroy Fresh, LLC and affiliated Mexican growers
and Representative of AMPHAC

**In Opposition to the Continuation of the
Antidumping Order (continued):**

Tom Lyons, Vice President, Business Development, Sales, & Marketing,
Kaliroy Fresh, LLC

Paul Manfre, General Manager, Top Katz LLC

Leo Spada, Owner-Operator, United Salad Co.

Michael Chapman	)
Jeffrey Winton	)
	) – OF COUNSEL
Amrietha Nellan	)
Alexis Cherry	)

ArentFox Schiff, LLC
Washington, DC
on behalf of

NS Brands Ltd.
NatureSweet Invernaderos, S. de R.L. de C.V.
NatureSweet Comercializadora, S. de R.L. de C.V.
(collectively “NatureSweet”)

Skip Hulett, Chief Legal Officer, NS Brands Ltd.

Tom Stenzel, Executive Director, Controlled Environment Agriculture
Alliance (CEA Alliance)

Dr. Timothy J. Richards, Consultant, Arizona State University and Badger
Metrics, LLC

Jessica R. DiPietro	)
Matthew M. Nolan	) – OF COUNSEL
Tyler J. Kimberly	)

**In Opposition to the Continuation of the
Antidumping Order (continued):**

Alston & Bird LLP
Washington, DC
on behalf of

Mastronardi Produce Limited
Mastronardi Produce-USA, Inc.
Mastronardi International Limited
(collectively "Mastronardi")

Kevin Safrance, Executive Vice Chairman, Mastronardi

David Einsteadig, General Counsel, Mastronardi

Lian Yang) – OF COUNSEL

Harris Sliwoski LLP
Seattle, WA
on behalf of

Fresh Produce Association of the Americas ("FPAA") – Tomato Division

Lance Jungmeyer, President, FPAA

Javier Badillo, Chairman, FPAA Tomato Division, Managing Member of Fresh
International

Jim Dimenna, President, Red Sun Farms

Carlos Visconti, Chief Executive Officer, Red Sun Farms

Adams Lee) – OF COUNSEL

**In Support of the Continuation of the
Antidumping Duty Order:**

Cassidy Levy Kent (USA) LLP
Washington, DC
on behalf of

Florida Tomato Exchange ("FTE")

Bob Spencer, President, West Coast Tomato, LLC/McClure Farms

**In Support of the Continuation of the
Antidumping Duty Order (continued):**

Jon Esformes, Chief Executive Officer, Pacific Tomato Growers (dba Sunripe Certified Brands)

Mike Sullivan, President and Chief Executive Officer, Gargiulo, Inc.

Priya Singh, General Manager, West Coast Tomato Growers, Inc.

Joel Viereck, Farm Manager, Viereck Farms LLC

Fred Leitz (remote witness), Chief Executive Officer, Leitz Farms LLC

Robert Guenther, Executive Vice President, Florida Tomato Exchange

James R. Cannon, Jr.	)	
Nicole Brunda	)	
	)	– OF COUNSEL
Shanni Alon	)	
Natalia King	)	

REBUTTAL/CLOSING REMARKS:

In Opposition to Continuation

(**Michael Chapman**, Winton & Chapman PLLC)

In Support of Continuation (**James R. Cannon, Jr.**, Cassidy Levy Kent LLP)

APPENDIX C

SUMMARY DATA

Table C.1: Fresh tomatoes: Summary data concerning all U.S. producers	C.3
Table C.2: Fresh tomatoes: Summary data concerning related party exclusions	C.5

All U.S. producers

Table C.1

Fresh tomatoes: Summary data concerning the U.S. market, by item and period

Quantity=1,000 pounds; Value=1,000 dollars; Unit values, unit labor costs, and unit expenses=dollars per pound; Period changes=percent--exceptions noted; Interim period is none

Item	Reported data				Period changes			
	Calendar year				Calendar year			
	2019	2023	2024	2025	2023-25	2023-24	2024-25	2019-25
U.S. consumption quantity:								
Amount	6,025,253	6,428,828	6,501,550	6,424,333	▼(0.1)	▲1.1	▼(1.2)	▲6.6
Producers' share (fn1)	33.2	31.0	27.7	30.3	▼(0.6)	▼(3.3)	▲2.7	▼(2.9)
Importers' share (fn1):								
Mexico	60.8	62.5	65.1	61.5	▼(0.9)	▲2.7	▼(3.6)	▲0.8
Canada	5.5	6.0	6.6	7.6	▲1.5	▲0.6	▲0.9	▲2.1
All other sources	0.5	0.6	0.6	0.6	▲0.0	▼(0.0)	▲0.0	▲0.1
Nonsubject sources	6.0	6.6	7.2	8.1	▲1.6	▲0.6	▲0.9	▲2.1
All import sources	66.8	69.0	72.3	69.7	▲0.6	▲3.3	▼(2.7)	▲2.9
U.S. consumption value:								
Amount	3,553,734	4,581,099	5,321,506	4,233,190	▼(7.6)	▲16.2	▼(20.5)	▲19.1
Producers' share (fn1)	32.7	28.5	29.4	29.9	▲1.4	▲0.9	▲0.5	▼(2.9)
Importers' share (fn1):								
Mexico	57.6	61.5	60.8	56.8	▼(4.7)	▼(0.8)	▼(4.0)	▼(0.8)
Canada	8.7	9.0	8.9	12.2	▲3.3	▼(0.0)	▲3.3	▲3.6
All other sources	1.0	1.0	0.9	1.1	▲0.1	▼(0.1)	▲0.2	▲0.1
Nonsubject sources	9.6	10.0	9.9	13.3	▲3.3	▼(0.1)	▲3.5	▲3.7
All import sources	67.3	71.5	70.6	70.1	▼(1.4)	▼(0.9)	▼(0.5)	▲2.9
U.S. imports from:								
Mexico:								
Quantity	3,661,788	4,015,226	4,235,705	3,953,320	▼(1.5)	▲5.5	▼(6.7)	▲8.0
Value	2,048,068	2,819,090	3,234,167	2,404,333	▼(14.7)	▲14.7	▼(25.7)	▲17.4
Unit value	\$0.56	\$0.70	\$0.76	\$0.61	▼(13.4)	▲8.8	▼(20.3)	▲8.7
Ending inventory quantity	17,780	25,469	30,910	47,095	▲84.9	▲21.4	▲52.4	▲164.9
Canada:								
Quantity	330,445	386,273	430,942	485,248	▲25.6	▲11.6	▲12.6	▲46.8
Value	308,284	410,740	475,860	517,840	▲26.1	▲15.9	▲8.8	▲68.0
Unit value	\$0.93	\$1.06	\$1.10	\$1.07	▲0.4	▲3.8	▼(3.4)	▲14.4
Ending inventory quantity	16	91	252	4,144	▲4,470.8	▲178.0	▲1,544.3	▲25,427.2
All other sources:								
Quantity	30,370	35,412	35,798	36,114	▲2.0	▲1.1	▲0.9	▲18.9
Value	34,247	47,168	49,297	47,087	▼(0.2)	▲4.5	▼(4.5)	▲37.5
Unit value	\$1.13	\$1.33	\$1.38	\$1.30	▼(2.1)	▲3.4	▼(5.3)	▲15.6
Ending inventory quantity	—	—	11	—	—	▲---	▼(100.0)	—
Nonsubject sources:								
Quantity	360,815	421,685	466,740	521,362	▲23.6	▲10.7	▲11.7	▲44.5
Value	342,531	457,908	525,158	564,927	▲23.4	▲14.7	▲7.6	▲64.9
Unit value	\$0.95	\$1.09	\$1.13	\$1.08	▼(0.2)	▲3.6	▼(3.7)	▲14.1
Ending inventory quantity	16	91	263	4,144	▲4,470.8	▲189.6	▲1,478.4	▲25,427.2
All import sources:								
Quantity	4,022,603	4,436,911	4,702,445	4,474,682	▲0.9	▲6.0	▼(4.8)	▲11.2
Value	2,390,599	3,276,997	3,759,324	2,969,260	▼(9.4)	▲14.7	▼(21.0)	▲24.2
Unit value	\$0.59	\$0.74	\$0.80	\$0.66	▼(10.2)	▲8.2	▼(17.0)	▲11.7
Ending inventory quantity	17,796	25,560	31,172	51,239	▲100.5	▲22.0	▲64.4	▲187.9

Table continued.

Table C.1 Continued

Fresh tomatoes: Summary data concerning the U.S. market, by item and period

Quantity=1,000 pounds; Value=1,000 dollars; Unit values, unit labor costs, and unit expenses=dollars per pound; Period changes=percent--exceptions noted;
Interim period is none

Item	Reported data				Period changes			
	2019	2023	2024	2025	2023-25	2023-24	2024-25	2019-25
U.S. producers':								
Growing area (acres)	23,840	33,037	36,558	35,931	▲8.8	▲10.7	▼(1.7)	▲50.7
Harvested quantity	1,300,018	1,275,049	1,315,039	1,430,963	▲12.2	▲3.1	▲8.8	▲10.1
Yield (pounds per acre)	54,531	38,595	35,971	39,825	▲3.2	▼(6.8)	▲10.7	▼(27.0)
Production quantity	1,226,638	1,226,459	1,254,353	1,356,683	▲10.6	▲2.3	▲8.2	▲10.6
All U.S. shipments (fn2):								
Quantity	2,002,649	1,991,917	1,799,105	1,949,651	▼(2.1)	▼(9.7)	▲8.4	▼(2.6)
Value	1,163,136	1,304,102	1,562,181	1,263,929	▼(3.1)	▲19.8	▼(19.1)	▲8.7
Unit value	\$0.58	\$0.65	\$0.87	\$0.65	▼(1.0)	▲32.6	▼(25.3)	▲11.6
Export shipments:								
Quantity	26,115	26,846	28,792	29,747	▲10.8	▲7.2	▲3.3	▲13.9
Value	19,043	18,035	25,456	16,953	▼(6.0)	▲41.1	▼(33.4)	▼(11.0)
Unit value	\$0.73	\$0.67	\$0.88	\$0.57	▼(15.2)	▲31.6	▼(35.5)	▼(21.8)
Ending inventory quantity	***	***	***	***	▲***	▲***	▼***	▲***
Inventories/total shipments (fn1)	***	***	***	***	▲***	▲***	▼***	▲***
Production workers	10,059	11,215	10,681	11,089	▼(1.1)	▼(4.8)	▲3.8	▲10.2
Hours worked (1,000s)	9,821	9,346	9,003	9,536	▲2.0	▼(3.7)	▲5.9	▼(2.9)
Wages paid (\$1,000)	134,063	154,212	156,424	168,358	▲9.2	▲1.4	▲7.6	▲25.6
Hourly wages (dollars per hour)	\$13.65	\$16.50	\$17.38	\$17.65	▲7.0	▲5.3	▲1.6	▲29.3
Productivity (pounds per hour)	125	131	139	142	▲8.4	▲6.2	▲2.1	▲13.9
Unit labor costs	\$0.11	\$0.13	\$0.12	\$0.12	▼(1.3)	▼(0.8)	▼(0.5)	▲13.5
Net sales:								
Quantity	1,189,646	1,170,010	1,231,596	1,301,569	▲11.2	▲5.3	▲5.7	▲9.4
Value	669,587	746,096	1,050,001	820,441	▲10.0	▲40.7	▼(21.9)	▲22.5
Unit value	\$0.56	\$0.64	\$0.85	\$0.63	▼(1.2)	▲33.7	▼(26.1)	▲12.0
Cost of goods sold (COGS)	531,421	663,901	747,524	817,608	▲23.2	▲12.6	▲9.4	▲53.9
Gross profit or (loss) (fn3)	138,166	82,195	302,478	2,833	▼(96.6)	▲268.0	▼(99.1)	▼(97.9)
SG&A expenses	49,820	68,643	91,658	83,943	▲22.3	▲33.5	▼(8.4)	▲68.5
Operating income or (loss) (fn3)	88,346	13,552	210,820	(81,110)	▼—	▲1,455.6	▼—	▼—
Net income or (loss) (fn3)	104,908	78,000	191,734	(42,549)	▼—	▲145.8	▼—	▼—
Unit COGS	\$0.45	\$0.57	\$0.61	\$0.63	▲10.7	▲7.0	▲3.5	▲40.6
Unit SG&A expenses	\$0.04	\$0.06	\$0.07	\$0.06	▲9.9	▲26.9	▼(13.3)	▲54.0
Unit operating income or (loss) (fn3)	\$0.07	\$0.01	\$0.17	\$(0.06)	▼—	▲1,377.8	▼—	▼—
Unit net income or (loss) (fn3)	\$0.09	\$0.07	\$0.16	\$(0.03)	▼—	▲133.5	▼—	▼—
COGS/sales (fn1)	79.4	89.0	71.2	99.7	▲10.7	▼(17.8)	▲28.5	▲20.3
Operating income or (loss)/sales (fn1)	13.2	1.8	20.1	(9.9)	▼(11.7)	▲18.3	▼(30.0)	▼(23.1)
Net income or (loss)/sales (fn1)	15.7	10.5	18.3	(5.2)	▼(15.6)	▲7.8	▼(23.4)	▼(20.9)
Capital expenditures	66,331	82,114	59,356	96,038	▲17.0	▼(27.7)	▲61.8	▲44.8
Research and development expenses	14,965	18,897	18,912	20,495	▲8.5	▲0.1	▲8.4	▲37.0
Total assets	940,611	1,279,936	1,303,705	1,320,101	▲3.1	▲1.9	▲1.3	▲40.3

Source: Compiled from data submitted in response to Commission questionnaires, USDA Vegetables and Pulses Yearbook, and official U.S. import statistics of the U.S. Department of Commerce using the HTS statistical reporting numbers listed for fresh tomatoes in footnote 1 of part 4 of this report, accessed June 10, 2026. Imports are based on the imports for consumption data series. Imports value data reflect the landed duty-paid value.

fn1.--Reported data are in percent and period changes are in percentage points.

fn2.--USDA production data less export shipments is used to report U.S. producers' all U.S. shipments data for 2019 through 2024. Due to data availability, 2025 U.S. producers' all U.S. shipments was derived using the questionnaire data vs. USDA data experience in 2024 to adjust reported 2025 data. To report value data for the derived U.S. shipments, the average unit value of U.S. producers' U.S. shipments from questionnaire responses was used to multiply against the all U.S. shipments quantity. Therefore, average unit values for U.S. shipments reflect the U.S. producers' U.S. shipments unit value from questionnaire responses.

fn3.--Percent changes only calculated when both comparison values represent profits; The directional change in profitability provided when one or both comparison values represent a loss.

Note.--Shares and ratios shown as "0.0" percent represent non-zero values less than "0.05" percent (if positive) and greater than "(0.05)" percent (if negative). Zeroes, null values, and undefined calculations are suppressed and shown as "—". Period changes preceded by a "▲" represent an increase, while period changes preceded by a "▼" represent a decrease. 508 compliant tables for these data are contained in Parts 1, 3, and 4 of this report.

Related party exclusion

Table C.2

Fresh tomatoes: Summary data concerning the U.S. market excluding two U.S. producers *, by item and period**

Quantity=1,000 pounds; Value=1,000 dollars; Unit values, unit labor costs, and unit expenses=dollars per pound; Period changes=percent--exceptions noted; Interim period is none

Item	Reported data				Period changes			
	Calendar year				Calendar year			
	2019	2023	2024	2025	2023-25	2023-24	2024-25	2019-25
U.S. consumption quantity:								
Amount	6,025,253	6,428,828	6,501,550	6,424,333	▼(0.1)	▲1.1	▼(1.2)	▲6.6
Producers' share (fn1):								
Included U.S. producers	***	***	***	***	▼***	▼***	▲***	▼***
Excluded U.S. producers	***	***	***	***	▲***	▲***	▲***	▼***
All U.S. producers	33.2	31.0	27.7	30.3	▼(0.6)	▼(3.3)	▲2.7	▼(2.9)
Importers' share (fn1):								
Mexico	60.8	62.5	65.1	61.5	▼(0.9)	▲2.7	▼(3.6)	▲0.8
Canada	5.5	6.0	6.6	7.6	▲1.5	▲0.6	▲0.9	▲2.1
All other sources	0.5	0.6	0.6	0.6	▲0.0	▼(0.0)	▲0.0	▲0.1
Nonsubject sources	6.0	6.6	7.2	8.1	▲1.6	▲0.6	▲0.9	▲2.1
All import sources	66.8	69.0	72.3	69.7	▲0.6	▲3.3	▼(2.7)	▲2.9
U.S. consumption value:								
Amount	3,553,734	4,581,099	5,321,506	4,233,190	▼(7.6)	▲16.2	▼(20.5)	▲19.1
Producers' share (fn1):								
Included U.S. producers	***	***	***	***	▲***	▲***	▲***	▼***
Excluded U.S. producers	***	***	***	***	▲***	▲***	▲***	▼***
All U.S. producers	32.7	28.5	29.4	29.9	▲1.4	▲0.9	▲0.5	▼(2.9)
Importers' share (fn1):								
Mexico	57.6	61.5	60.8	56.8	▼(4.7)	▼(0.8)	▼(4.0)	▼(0.8)
Canada	8.7	9.0	8.9	12.2	▲3.3	▼(0.0)	▲3.3	▲3.6
All other sources	1.0	1.0	0.9	1.1	▲0.1	▼(0.1)	▲0.2	▲0.1
Nonsubject sources	9.6	10.0	9.9	13.3	▲3.3	▼(0.1)	▲3.5	▲3.7
All import sources	67.3	71.5	70.6	70.1	▼(1.4)	▼(0.9)	▼(0.5)	▲2.9
U.S. imports from:								
Mexico:								
Quantity	3,661,788	4,015,226	4,235,705	3,953,320	▼(1.5)	▲5.5	▼(6.7)	▲8.0
Value	2,048,068	2,819,090	3,234,167	2,404,333	▼(14.7)	▲14.7	▼(25.7)	▲17.4
Unit value	\$0.56	\$0.70	\$0.76	\$0.61	▼(13.4)	▲8.8	▼(20.3)	▲8.7
Ending inventory quantity	17,780	25,469	30,910	47,095	▲84.9	▲21.4	▲52.4	▲164.9
Canada:								
Quantity	330,445	386,273	430,942	485,248	▲25.6	▲11.6	▲12.6	▲46.8
Value	308,284	410,740	475,860	517,840	▲26.1	▲15.9	▲8.8	▲68.0
Unit value	\$0.93	\$1.06	\$1.10	\$1.07	▲0.4	▲3.8	▼(3.4)	▲14.4
Ending inventory quantity	16	91	252	4,144	▲4,470.8	▲178.0	▲1,544.3	▲25,427.2
All other sources:								
Quantity	30,370	35,412	35,798	36,114	▲2.0	▲1.1	▲0.9	▲18.9
Value	34,247	47,168	49,297	47,087	▼(0.2)	▲4.5	▼(4.5)	▲37.5
Unit value	\$1.13	\$1.33	\$1.38	\$1.30	▼(2.1)	▲3.4	▼(5.3)	▲15.6
Ending inventory quantity	—	—	11	—	—	▲***	▼(100.0)	—
Nonsubject sources:								
Quantity	360,815	421,685	466,740	521,362	▲23.6	▲10.7	▲11.7	▲44.5
Value	342,531	457,908	525,158	564,927	▲23.4	▲14.7	▲7.6	▲64.9
Unit value	\$0.95	\$1.09	\$1.13	\$1.08	▼(0.2)	▲3.6	▼(3.7)	▲14.1
Ending inventory quantity	16	91	263	4,144	▲4,470.8	▲189.6	▲1,478.4	▲25,427.2
All import sources:								
Quantity	4,022,603	4,436,911	4,702,445	4,474,682	▲0.9	▲6.0	▼(4.8)	▲11.2
Value	2,390,599	3,276,997	3,759,324	2,969,260	▼(9.4)	▲14.7	▼(21.0)	▲24.2
Unit value	\$0.59	\$0.74	\$0.80	\$0.66	▼(10.2)	▲8.2	▼(17.0)	▲11.7
Ending inventory quantity	17,796	25,560	31,172	51,239	▲100.5	▲22.0	▲64.4	▲187.9

Table continued.

Table C.2 Continued

Fresh tomatoes: Summary data concerning the U.S. market excluding two U.S. producers *, by item and period**

Quantity=1,000 pounds; Value=1,000 dollars; Unit values, unit labor costs, and unit expenses=dollars per pound; Period changes=percent--exceptions noted; Interim period is none

Item	Reported data				Period changes			
	Calendar year				Calendar year			
	2019	2023	2024	2025	2023-25	2023-24	2024-25	2019-25
Included U.S. producers ¹ :								
Growing area (acres)	***	***	***	***	▲***	▲***	▼***	▲***
Harvested quantity	***	***	***	***	▲***	▲***	▲***	▲***
Yield (pounds per acre)	***	***	***	***	▲***	▼***	▲***	▼***
Production quantity	***	***	***	***	▲***	▲***	▲***	▲***
All U.S. shipments (fn2):								
Quantity	***	***	***	***	▼***	▼***	▲***	▼***
Value	***	***	***	***	▼***	▲***	▼***	▲***
Unit value	***	***	***	***	▼***	▲***	▼***	▲***
Export shipments:								
Quantity	***	***	***	***	▲***	▲***	▲***	▲***
Value	***	***	***	***	▼***	▲***	▼***	▼***
Unit value	***	***	***	***	▼***	▲***	▼***	▼***
Ending inventory quantity	***	***	***	***	▲***	▲***	▼***	▲***
Inventories/total shipments (fn1)	***	***	***	***	▲***	▲***	▼***	▲***
Production workers	***	***	***	***	▼***	▼***	▲***	▲***
Hours worked (1,000s)	***	***	***	***	▼***	▼***	▲***	▼***
Wages paid (\$1,000)	***	***	***	***	▲***	▼***	▲***	▲***
Hourly wages (dollars per hour)	***	***	***	***	▲***	▲***	▲***	▲***
Productivity (pounds per hour)	***	***	***	***	▲***	▲***	▲***	▲***
Unit labor costs	***	***	***	***	▼***	▼***	▼***	▲***
Net sales:								
Quantity	***	***	***	***	▲***	▲***	▲***	▲***
Value	***	***	***	***	▲***	▲***	▼***	▲***
Unit value	***	***	***	***	▼***	▲***	▼***	▲***
Cost of goods sold (COGS)	***	***	***	***	▲***	▲***	▲***	▲***
Gross profit or (loss) (fn3)	***	***	***	***	▼***	▲***	▼***	▼***
SG&A expenses	***	***	***	***	▲***	▲***	▼***	▲***
Operating income or (loss) (fn3)	***	***	***	***	▼***	▲***	▼***	▼***
Net income or (loss) (fn3)	***	***	***	***	▼***	▲***	▼***	▼***
Unit COGS	***	***	***	***	▲***	▲***	▲***	▲***
Unit SG&A expenses	***	***	***	***	▲***	▲***	▼***	▲***
Unit operating income or (loss) (fn3)	***	***	***	***	▼***	▲***	▼***	▼***
Unit net income or (loss) (fn3)	***	***	***	***	▼***	▲***	▼***	▼***
COGS/sales (fn1)	***	***	***	***	▲***	▼***	▲***	▲***
Operating income or (loss)/sales (fn1)	***	***	***	***	▼***	▲***	▼***	▼***
Net income or (loss)/sales (fn1)	***	***	***	***	▼***	▲***	▼***	▼***
Capital expenditures	***	***	***	***	▲***	▼***	▲***	▲***
Research and development expenses	***	***	***	***	▲***	▲***	▲***	▲***
Total assets	***	***	***	***	▲***	▲***	▲***	▲***

Source: Compiled from data submitted in response to Commission questionnaires, USDA Vegetables and Pulses Yearbook, and official U.S. import statistics of the U.S. Department of Commerce using the HTS statistical reporting numbers listed for fresh tomatoes in footnote 1 of part 4 of this report, accessed June 10, 2026. Imports are based on the imports for consumption data series. Imports value data reflect the landed duty-paid value.

fn1.--Reported data are in percent and period changes are in percentage points.

fn2.--USDA production data less export shipments is used to report U.S. producers' all U.S. shipments data for 2019 through 2024. Due to data availability, 2025 U.S. producers' all U.S. shipments was derived using the questionnaire data for included U.S. producers vs. USDA data experience in 2024 to adjust reported 2025 data. To report value data for the derived U.S. shipments, the average unit value of U.S. producers' U.S. shipments from questionnaire responses was used to multiply against the all U.S. shipments quantity. Therefore, average unit values for U.S. shipments reflect the included U.S. producers' U.S. shipments unit value from questionnaire responses.

fn3.--Percent changes only calculated when both comparison values represent profits; The directional change in profitability provided when one or both comparison values represent a loss.

Note.--Shares and ratios shown as "0.0" percent represent non-zero values less than "0.05" percent (if positive) and greater than "(0.05)" percent (if negative). Zeroes, null values, and undefined calculations are suppressed and shown as "—". Period changes preceded by a "▲" represent an increase, while period changes preceded by a "▼" represent a decrease. 508 compliant tables for these data are available upon request.

APPENDIX D

MARKET PARTICIPANT RESPONSES REGARDING

THE EFFECTS OF TARIFF LEVEL CHANGES ON THE MARKET

Table D.1 Fresh tomatoes: U.S. producers' responses regarding specific effects of the termination of the 2019 *Suspension Agreement* and imposition of antidumping duties on July 14, 2025

Firm	Effect(s) on the fresh tomatoes market
***	***
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Table continued.

Table D.1 (Continued) Fresh tomatoes: U.S. producers' responses regarding specific effects of the termination of the 2019 *Suspension Agreement* and imposition of antidumping duties on July 14, 2025

Firm	Effect(s) on the fresh tomatoes market
***	***
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Source: Compiled from data submitted in response to Commission questionnaires.

Table D.2 Fresh tomatoes: Importers' responses regarding specific effects of the termination of the 2019 *Suspension Agreement* and imposition of antidumping duties on July 14, 2025

Firm Name	Effect(s) on the fresh tomatoes market
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Source: Compiled from responses to Commission questionnaires.

Table D.3 Fresh tomatoes: Purchasers' responses regarding specific effects of the termination of the 2019 Suspension Agreement and imposition of antidumping duties on July 14, 2025

Firm	Effect(s) on the fresh tomatoes market
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Source: Compiled from responses to Commission questionnaires.

Table D.4 Fresh tomatoes: Foreign producers' responses regarding specific effects of the termination of the *2019 Suspension Agreement* and imposition of antidumping duties on July 14, 2025

Firm Name	Effect(s) on the fresh tomatoes market
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Source: Compiled from responses to Commission questionnaires.

Table D.5 Fresh tomatoes: U.S. producers' responses regarding the impact of the 2025 tariff announcements and changes associated with Presidential actions

Firm	Effect(s) on the fresh tomatoes market
***	***
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Source: Compiled from data submitted in response to Commission questionnaires.

Table D.6 Fresh tomatoes: Importers' responses regarding the impact of the 2025 tariff announcements and changes associated with Presidential actions

Firm Name	Effect(s) on the fresh tomatoes market
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Source: Compiled from responses to Commission questionnaires.

Table D.7 Fresh tomatoes: Purchasers' responses regarding the impact of the 2025 tariff announcements and changes associated with Presidential actions

Firm	Effect(s) on the fresh tomatoes market
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Table continued.

Table D.7 (Continued) Fresh tomatoes: Purchasers' responses regarding the impact of the 2025 tariff announcements and changes associated with Presidential actions

Firm	Effect(s) on the fresh tomatoes market
***	***
***	***

Source: Compiled from responses to Commission questionnaires.

Table D.8 Fresh tomatoes: Foreign producers' responses regarding the impact of the 2025 tariff announcements and changes associated with Presidential actions

Firm Name	Effect(s) on the fresh tomatoes market
***	***
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Source: Compiled from responses to Commission questionnaires.

APPENDIX E

FOREIGN PRODUCER DESCRIPTIONS OF THEIR HOME MARKET

Table E.1 Fresh tomatoes: Foreign producers' descriptions of their home market

Firm Name	Narrative descriptions of the home market
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Source: Compiled from responses to Commission questionnaires.

APPENDIX F

Comments on effects of orders and likely effects of revocation

Table F.1 Fresh tomatoes: Firms' narratives on the impact of the order and the likely impact of revocation

Response type	Firm type	Firm name and narrative on impact or likely impact
Effect of order	U.S. producers	***
Effect of order	U.S. producers	***
Effect of order	U.S. producers	***
Effect of order	U.S. producers	***
Effect of order	U.S. producers	***
Effect of order	U.S. producers	***
Effect of order	U.S. producers	***
Effect of order	U.S. producers	***
Effect of order	U.S. producers	***
Effect of order	U.S. producers	***
Effect of order	U.S. producers	***
Effect of order	U.S. producers	***
Effect of order	U.S. producers	***
Effect of order	U.S. producers	***
Effect of order	U.S. producers	***
Effect of order	U.S. producers	***
Likely impact of revocation	U.S. producers	***
Likely impact of revocation	U.S. producers	***
Likely impact of revocation	U.S. producers	***
Likely impact of revocation	U.S. producers	***
Likely impact of revocation	U.S. producers	***
Likely impact of revocation	U.S. producers	***
Likely impact of revocation	U.S. producers	***
Likely impact of revocation	U.S. producers	***
Likely impact of revocation	U.S. producers	***
Likely impact of revocation	U.S. producers	***
Likely impact of revocation	U.S. producers	***
Likely impact of revocation	U.S. producers	***
Likely impact of revocation	U.S. producers	***
Effect of order	Importers	***
Effect of order	Importers	***
Effect of order	Importers	***
Effect of order	Importers	***
Effect of order	Importers	***
Effect of order	Importers	***
Effect of order	Importers	***
Effect of order	Importers	***
Effect of order	Importers	***
Effect of order	Importers	***

Likely impact of revocation	Foreign producers	***
Likely impact of revocation	Foreign producers	***
Likely impact of revocation	Foreign producers	***
Likely impact of revocation	Foreign producers	***
Likely impact of revocation	Foreign producers	***
Likely impact of revocation	Foreign producers	***
Likely impact of revocation	Foreign producers	***

Source: Compiled from data submitted in response to Commission questionnaires.

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Table F.2 Fresh tomatoes: Firms' narratives on the effect of the 2019 Suspension Agreement, by firm type

[illegible]

APPENDIX G

FRESH TOMATOES PRICING DATA IN 2025

USING GROWING ENVIRONMENT SHARES

U.S. producers and importers were asked to report the shares of their 2025 commercial sales by the type of growing environment (controlled environment hydroponic (“CEH”), protected culture (“PC”), and open field (“OF”)) for each of the six products meeting the pricing product definitions in Part 5. Tables G.1 through G.3 present the submitted monthly pricing data for fresh tomatoes that were grown using the CEH method. While five pricing products were grown using this method in Mexico, only products 4 and 6 were grown domestically in this environment.¹ Price comparisons for CEH fresh tomatoes are presented in table G.4. As shown in that table, imports from Mexico undersold domestic product in 23 of 24 possible quarters, with an average margin of 37.3 percent. Table G.5 presents data for sales of products 1, 2, 4, and 6 imported from Mexico, as there were no reported domestic fresh tomatoes commercially sold that were grown using the PC method. Tables G.6 to G.10 present pricing data for domestic and Mexican fresh tomatoes grown using the OF method, and table G.11 presents underselling and overselling comparisons for those products. As shown in that table, imports from Mexico undersold domestic product in 18 of 45 possible quarters. Though there were fewer quarters of underselling than overselling, these underselling quarters accounted for a larger quantity of imports than the overselling quarters did (108.2 million pounds vs. 97.4 million pounds), mainly due to large volumes of product 2 (vine-ripe Roma/plum tomatoes).

¹ As noted in Part 5, no data were received from U.S. producers or importers for Product 5.

Table G.1 Fresh tomatoes: Weighted-average f.o.b. prices and quantities of imported controlled environment hydroponic-grown products 1, 2, and 3, by quarter

Price in dollars per pound; quantity in thousands of pounds; margin in percent

Period	Product 1 Mexico price	Product 1 Mexico quantity	Product 2 Mexico price	Product 2 Mexico quantity	Product 3 Mexico price	Product 3 Mexico quantity
January 2025	***	***	***	***	***	***
February 2025	***	***	***	***	***	***
March 2025	***	***	***	***	***	***
April 2025	***	***	***	***	***	***
May 2025	***	***	***	***	***	***
June 2025	***	***	***	***	***	***
July 2025	***	***	***	***	***	***
August 2025	***	***	***	***	***	***
September 2025	***	***	***	***	***	***
October 2025	***	***	***	***	***	***
November 2025	***	***	***	***	***	***
December 2025	***	***	***	***	***	***

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Product 1: Mature green plum/Roma tomatoes, 85 percent U.S. #1 or better, bulk packed in 20-pound or above boxes.

Note: Product 2: Vine ripe plum/Roma tomatoes, 85 percent U.S. #1 or better, bulk packed in 20-pound or above boxes.

Note: Product 3: Mature green round tomatoes, packed in two layer or 15-pound or above boxes, 85 percent or better U.S.#1.

Table G.2 Fresh tomatoes: Weighted-average f.o.b. prices and quantities of domestic and imported controlled environment hydroponic-grown product 4, and margins of underselling/(overselling), by source and quarter

Price in dollars per pound; quantity in thousands of pounds; margin in percent

Period	U.S. price	U.S. quantity	Mexico price	Mexico quantity	Margin
January 2025	***	***	***	***	***
February 2025	***	***	***	***	***
March 2025	***	***	***	***	***
April 2025	***	***	***	***	***
May 2025	***	***	***	***	***
June 2025	***	***	***	***	***
July 2025	***	***	***	***	***
August 2025	***	***	***	***	***
September 2025	***	***	***	***	***
October 2025	***	***	***	***	***
November 2025	***	***	***	***	***
December 2025	***	***	***	***	***

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Product 4: Vine ripe round tomatoes, packed in two layer or 15-pound or above boxes, 85 percent or better U.S.#1.

Table G.3 Fresh tomatoes: Weighted-average f.o.b. prices and quantities of domestic and imported controlled environment hydroponic-grown product 6, and margins of underselling/(overselling), by source and quarter

Price in dollars per pound; quantity in thousands of pounds

Period	U.S. price	U.S. quantity	Mexico price	Mexico quantity	Margin
January 2025	***	***	***	***	***
February 2025	***	***	***	***	***
March 2025	***	***	***	***	***
April 2025	***	***	***	***	***
May 2025	***	***	***	***	***
June 2025	***	***	***	***	***
July 2025	***	***	***	***	***
August 2025	***	***	***	***	***
September 2025	***	***	***	***	***
October 2025	***	***	***	***	***
November 2025	***	***	***	***	***
December 2025	***	***	***	***	***

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Product 6: Vine ripe cherry/grape tomatoes, packed in one pint clam shells, 12 pints per box, 85 percent or better U.S.#1.

Table G.4 Fresh tomatoes: Instances of underselling/overselling and the range and average of margins for controlled environment hydroponic-grown fresh tomatoes in 2025, by product

Quantity in thousands of pounds; margin in percent

Product	Type	Number of quarters	Quantity	Average margin	Min margin	Max margin
Product 4	Underselling	11	***	***	***	***
Product 6	Underselling	12	***	***	***	***
Total, all products	Underselling	23	380,810	37.3	13.3	56.5
Product 4	Overselling	1	9,525	(27.5)	(27.5)	(27.5)
Product 6	Overselling	0	—	—	—	—
Total, all products	Overselling	1	9,525	(27.5)	(27.5)	(27.5)

Source: Compiled from data submitted in response to Commission questionnaires.

Note: These data include only products and quarters in which there is a comparison between the U.S. and subject product.

Table G.5 Fresh tomatoes: Weighted-average f.o.b. prices and quantities of imported protected culture-grown products 1, 2, 4, and 6

Price in dollars per pound; quantity in thousands of pounds

Period	Product 1 Mexico price	Product 1 Mexico quantity	Product 2 Mexico price	Product 2 Mexico quantity
January 2025	***	***	***	***
February 2025	***	***	***	***
March 2025	***	***	***	***
April 2025	***	***	***	***
May 2025	***	***	***	***
June 2025	***	0	***	***
July 2025	***	***	***	***
August 2025	***	***	***	***
September 2025	***	***	***	***
October 2025	***	***	***	***
November 2025	***	***	***	***
December 2025	***	***	***	***

Table continued.

Period	Product 4 Mexico price	Product 4 Mexico quantity	Product 6 Mexico price	Product 6 Mexico quantity
January 2025	***	***	***	***
February 2025	***	***	***	***
March 2025	***	***	***	***
April 2025	***	***	***	***
May 2025	***	***	***	***
June 2025	***	***	***	***
July 2025	***	***	***	***
August 2025	***	***	***	***
September 2025	***	***	***	***
October 2025	***	***	***	***
November 2025	***	***	***	***
December 2025	***	***	***	***

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Product 1: Mature green plum/Roma tomatoes, 85 percent U.S. #1 or better, bulk packed in 20-pound or above boxes.

Note: Product 2: Vine ripe plum/Roma tomatoes, 85 percent U.S. #1 or better, bulk packed in 20-pound or above boxes.

Note: Product 4: Vine ripe round tomatoes, packed in two layer or 15-pound or above boxes, 85 percent or better U.S.#1.

Note: Product 6: Vine ripe cherry/grape tomatoes, packed in one pint clam shells, 12 pints per box, 85 percent or better U.S.#1.

Table G.6 Fresh tomatoes: Weighted-average f.o.b. prices and quantities of domestic and imported open field-grown product 1, and margins of underselling/(overselling), by source and quarter

Price in dollars per pound; quantity in thousands of pounds

Period	U.S. price	U.S. quantity	Mexico price	Mexico quantity	Margin
January 2025	***	***	***	***	***
February 2025	***	***	***	***	***
March 2025	***	***	***	***	***
April 2025	***	***	***	***	***
May 2025	***	***	***	***	***
June 2025	***	***	***	0	***
July 2025	***	***	***	***	***
August 2025	***	***	***	***	***
September 2025	***	***	***	***	***
October 2025	***	***	***	***	***
November 2025	***	***	***	***	***
December 2025	***	***	***	***	***

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Product 1: Mature green plum/Roma tomatoes, 85 percent U.S. #1 or better, bulk packed in 20-pound or above boxes.

Table G.7 Fresh tomatoes: Weighted-average f.o.b. prices and quantities of domestic and imported open field-grown product 2, and margins of underselling/(overselling), by source and quarter

Price in dollars per pound; quantity in thousands of pounds

Period	U.S. price	U.S. quantity	Mexico price	Mexico quantity	Margin
January 2025	***	***	***	***	***
February 2025	***	***	***	***	***
March 2025	***	***	***	***	***
April 2025	***	***	***	***	***
May 2025	***	***	***	***	***
June 2025	***	***	***	***	***
July 2025	***	0	***	***	***
August 2025	***	***	***	***	***
September 2025	***	***	***	***	***
October 2025	***	***	***	***	***
November 2025	***	***	***	***	***
December 2025	***	***	***	***	***

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Product 2: Vine ripe plum/Roma tomatoes, 85 percent U.S. #1 or better, bulk packed in 20-pound or above boxes.

Table G.8 Fresh tomatoes: Weighted-average f.o.b. prices and quantities of domestic and imported open field-grown product 3, by source and quarter

Price in dollars per pound; quantity in thousands of pounds

Period	U.S. price	U.S. quantity	Mexico price	Mexico quantity	Margin
January 2025	***	***	***	0	***
February 2025	***	***	***	0	***
March 2025	***	***	***	0	***
April 2025	***	***	***	0	***
May 2025	***	***	***	0	***
June 2025	***	***	***	0	***
July 2025	***	***	***	0	***
August 2025	***	***	***	0	***
September 2025	***	***	***	0	***
October 2025	***	***	***	0	***
November 2025	***	***	***	0	***
December 2025	***	***	***	0	***

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Product 3: Mature green round tomatoes, packed in two layer or 15-pound or above boxes, 85 percent or better U.S.#1.

Table G.9 Fresh tomatoes: Weighted-average f.o.b. prices and quantities of domestic and imported open field-grown product 4, and margins of underselling/(overselling), by source and quarter

Price in dollars per pound; quantity in thousands of pounds

Period	U.S. price	U.S. quantity	Mexico price	Mexico quantity	Margin
January 2025	***	***	***	***	***
February 2025	***	***	***	***	***
March 2025	***	***	***	***	***
April 2025	***	***	***	***	***
May 2025	***	***	***	***	***
June 2025	***	***	***	***	***
July 2025	***	***	***	***	***
August 2025	***	***	***	***	***
September 2025	***	***	***	***	***
October 2025	***	***	***	***	***
November 2025	***	***	***	***	***
December 2025	***	***	***	***	***

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Product 4: Vine ripe round tomatoes, packed in two layer or 15-pound or above boxes, 85 percent or better U.S.#1.

Table G.10 Fresh tomatoes: Weighted-average f.o.b. prices and quantities of domestic and imported open field-grown product 6, and margins of underselling/(overselling), by source and quarter

Price in dollars per pound; quantity in thousands of pounds

Period	U.S. price	U.S. quantity	Mexico price	Mexico quantity	Margin
January 2025	***	***	***	***	***
February 2025	***	***	***	***	***
March 2025	***	***	***	***	***
April 2025	***	***	***	***	***
May 2025	***	***	***	***	***
June 2025	***	***	***	***	***
July 2025	***	***	***	***	***
August 2025	***	***	***	***	***
September 2025	***	***	***	***	***
October 2025	***	***	***	***	***
November 2025	***	***	***	***	***
December 2025	***	***	***	***	***

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Product 6: Vine ripe cherry/grape tomatoes, packed in one pint clam shells, 12 pints per box, 85 percent or better U.S.#1.

Table G.11 Fresh tomatoes: Instances of underselling/overselling and the range and average of margins for open field-grown fresh tomatoes in 2025, by product

Quantity in thousands of pounds; margin in percent

Product	Type	Number of quarters	Quantity	Average margin	Min margin	Max margin
Product 1	Underselling	7	***	***	***	***
Product 2	Underselling	7	***	***	***	***
Product 4	Underselling	2	***	***	***	***
Product 6	Underselling	2	***	***	***	***
Total, all products	Underselling	18	108,253	16.6	0.7	52.5
Product 1	Overselling	4	***	***	***	***
Product 2	Overselling	4	***	***	***	***
Product 4	Overselling	10	***	***	***	***
Product 6	Overselling	10	***	***	***	***
Total, all products	Overselling	27	97,433	(25.1)	(0.1)	(108.3)

Source: Compiled from data submitted in response to Commission questionnaires.

Note: These data include only products and quarters in which there is a comparison between the U.S. and subject product.