

The United States requests, pursuant to Article 31-A.4.2 of the United States-Mexico-Canada Agreement (USMCA), that Mexico conduct a review of whether a Denial of Rights is occurring to workers at a facility operated by Goodyear-SLP, S. de R.L. de C.V. (the Company), located in the city and state of San Luis Potosí, Mexico (the Facility). As defined in USMCA Article 31-A.2, a Denial of Rights occurs when workers are being denied the right of free association and collective bargaining under laws necessary to fulfill a Party's obligations under the USMCA.

The United States is concerned that workers at the Facility are being denied the right of free association and collective bargaining through a failure by the Company to provide workers with the beneficial terms of an existing sectoral collective bargaining agreement ("*contrato ley*") in place for the rubber manufacturing industry.¹ The United States is also concerned that workers at the Facility have been misinformed about the application of the *contrato ley* by the Company and by a union known as the *Sindicato Nacional de Trabajadores de la Industria Metal-Mecánica, Sidero-Metalúrgica, Automotriz y Proveedoras de Autopartes en General, de la Energía, Sus Derivados y Similares de la República Mexicana, "Miguel Trujillo Lopez"* (the Union). Further, to the extent that any individuals or entities legally culpable for attempts to obstruct or otherwise interfere with the rights of the workers to exercise their rights to collective bargaining and free association through a legitimization vote, have not been appropriately sanctioned for that activity, the United States considers that such failures also would constitute a denial of rights.

The actions, statements, and omissions encompassed by this review include those of any person or entity, including the Company and the Union, and any of their employees, representatives, or agents.

If Mexico were to determine that there is a Denial of Rights, the United States further requests, pursuant to USMCA Article 31-A.4.2, that Mexico attempt to remediate within 45 days of this request.

We look forward to receiving Mexico's notification of whether it intends to conduct the requested review.²

¹ See Secretaría de Gobernación, Contrato Ley de la Industria de la Transformación del Hule en Productos Manufacturados con vigencia del 13 de febrero de 2015 al 12 de febrero de 2017.

² USMCA Article 31-A.4.2 ("The respondent Party shall have 10 days to notify the complainant Party as to whether it intends to conduct a review.").