

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 at the facility operated by Industrias del Interior S. de R.L. de C.V. (the Company) in the vicinity of Rincón de Romos, Aguascalientes (the Facility).¹ 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 as a result of interference in workers' union activities. Specifically, in relation to ongoing negotiations concerning the Facility's collective bargaining agreement (CBA), it appears that the company is aiding workers who support a company-proposed CBA and hindering the activities of workers who oppose the company proposal. Interference at the Facility appears to include the selective exemption of workers from normal work rules and the provision of legal and other assistance to them. It also appears to include the reassignment and discipline of workers, including through dismissals, based on their union or CBA support. The United States is concerned that this apparent interference in workers' union activities has negatively impacted the ongoing collective bargaining negotiations.

The actions, statements, and omissions encompassed by this request for review include those of any person or entity, including the Company and the unions, 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 To the extent the Company has reassigned workers to other plants involved in the production process, the United States considers those plants to be part of the Facility.

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.").