



AGOA

Analysis and Modernization Recommendations

DIPLOMACY LAB CAPSTONE 2026

PREPARED FOR

U.S. Department of State

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APRIL 29, 2026

Executive Summary

Who We Are

We are a team of seniors at American University collaborating with the Bureau of Economic, Energy, and Business Affairs of the United States Department of State to produce a policy report on the modernization of the African Growth and Opportunity Act (AGOA). Enacted in 2000, AGOA has served for twenty-five years as the foundation of U.S. trade engagement with Sub-Saharan Africa. Most recently extended through December 2026, the program now faces a critical juncture: its long-term renewal is unresolved, and the world it was designed for has changed considerably. This report offers recommendations for how a modernized AGOA can serve both U.S. and African interests in the years ahead.

Methodology

The report's findings draw from interviews with a broad range of experts spanning government, academia, the private sector, and civil society - including trade economists, former U.S. Trade Representative (USTR) officials, congressional staff, investment professionals, and Africa policy scholars. Interview findings were supplemented by a review of existing legislation, Congressional Research Service reports, and analyses produced by institutions including the Brookings Institution, the Center for Strategic and International Studies (CSIS), and the Wilson Center. The result is an assessment of where AGOA falls short and what a modernized framework should look like.

Findings

Our research has surfaced several structural problems with the current AGOA framework. Eligibility criteria are applied inconsistently and produce adverse consequences, including abrupt country suspensions and sudden job losses that can undermine the program's development goals. AGOA's geographic scope and rules of origin have not kept pace with Africa's growing economic integration. Program utilization remains relatively low, as many eligible countries lack the capacity to participate effectively across the full range of eligible goods and sectors. U.S. private investment on the continent is constrained by distorted risk perceptions that the U.S. government has done little to resolve. Africa's vast critical mineral reserves, which are essential to U.S. supply chains in clean energy and defense, are underused, with most processing continuing to occur in China. AGOA's congressional path is also complicated by a lack of dedicated advocacy, a tendency to be bundled into larger sets of legislation, and renewal windows that are too short to support long-term investment.

Proposals

We propose eight core reforms to modernize AGOA:

1. Extend AGOA renewal to a minimum of 20 years.
2. Identify a senior legislative Republican to champion a renewed AGOA in the executive branch.
3. Create a structured graduation program that phases out benefits gradually rather than removing them abruptly when countries reach development thresholds.
4. Prioritizing critical mineral processing in AGOA states.
5. Transition re-eligibility processes from annual to a tiered triennial system with annual monitoring and emergency review provisions.
6. Counter challenges to investment through encouraging financing infrastructure and building confidence in African success stories.
7. Align AGOA with the AfCFTA and expand geographic scope by modernizing rules of origin and extending eligibility to North African states to reflect the continent's integration.
8. Establish a specialized AGOA office to help eligible countries identify underutilized sectors and build the capacity to participate fully in the program.

Background

AGOA and Its Accomplishments

The African Growth and Opportunity Act, enacted by the U.S. Congress in May 2000 as Title I of the Trade and Development Act of 2000 (P.L. 106–200), was designed to strengthen the economies of Sub-Saharan Africa and deepen economic relations between the United States and the region. At its core, AGOA is a unilateral, non-reciprocal trade preference program representing a foundational expression of American economic engagement with the African continent. The Act grants eligible Sub-Saharan African countries duty-free access to the U.S. market for over 1,800 products, among other economic privileges. In exchange for this preferential treatment, participating countries must meet conditions tied to democratic governance and economic reform, including the establishment of market based economies, rule of law, political pluralism, due process protections, elimination of barriers to U.S. trade and investment, poverty-reduction policies, anti-corruption measures, and protection of internationally recognized worker rights.¹

The legislation emerged after nearly a decade of advocacy and congressional work. Since its signing by President Clinton in 2000, AGOA has been extended twice, first through the AGOA Acceleration Act of 2004, and again in 2015 through a ten year congressional extension. Most recently, the Consolidated Appropriations Act reauthorized AGOA through December 2026. As of today, 32 countries remain eligible for AGOA benefits, and the program's long-term renewal remains an open and pressing question for both Congress and the current administration.

Over its 25-year history, AGOA has produced measurable gains for participating African economies, U.S. businesses, and the broader bilateral commercial relationship. African beneficiary countries exported approximately \$103 billion worth of non-crude products to the U.S. between 2001 and 2022.² While crude petroleum accounted for 43% of all products exported under the program in 2022, non-crude exports grew by 241% over that same period, demonstrating the program's capacity to improve the export competitiveness of value-added goods.³ The Millennium Challenge Corporation reports that non-oil exports increased by nearly 200% since AGOA's enactment, rising to \$4.1 billion in 2015, growth that spurred an estimated 300,000 direct jobs in beneficiary countries.⁴

The program has been particularly transformative in the textile and apparel sector. In Kenya, AGOA-linked apparel sales grew from \$55 million in 2001 to \$603 million in

¹ Office of the United States Trade Representatives. "African Growth and Opportunity Act (AGOA)". <https://ustr.gov/issue-areas/trade-development/preference-programs/african-growth-and-opportunity-act-agoa>

² Schneidman, Witney; Dicharry, Natalie. "AGOA Forum 2024: Insights, economic benefits for Africa, and the road ahead". Brookings Institute. September 5, 2024.

³ Schneidman; Dicharry.

⁴ Millennium Challenge Corporation. "MCC and the African Growth and Opportunity Act (AGOA).

2022, representing 67.6% of Kenya's total exports to the United States.⁵ South Africa's automotive exports to the U.S. increased by 447% between 2001 and 2022, exemplifying the problem capacity to catalyze manufacturing diversification.⁶ Ethiopia's trajectory prior to its 2022 suspension was equally illustrative: in under a decade, AGOA-linked industrial parks created 90,000 direct jobs and the country's exports to the U.S. rose from \$29 million to \$525 million by 2020.⁷ These examples highlight AGOA's role as a genuine engine of industrialization, job creation and economic diversification across the continent. That record of achievement is at stake in the contemporary conversation over AGOA's renewal.

The Case for Modernization

Despite AGOA's achievements, the economic and geopolitical realities of the 21st century are increasingly changing the context and motivations of the U.S.-Africa trade relationship. Supply chains are more interconnected than ever, intra-continental economic integration has accelerated significantly, and competition with external actors like China has made Africa a strategic priority for the United States in a way that was not fully anticipated when the Act was first drafted.

Central among those realities is the rise of the African Continental Free Trade Area (AfCFTA). Ratified by 47 African nations, the AfCFTA is designed to create a \$3 trillion free trade area and is expected to be instrumental in reducing poverty through economic integration while accelerating economic diversification across the continent.⁸ An AGOA that does not align its rules of origin and eligibility structure with the AfCFTA risks becoming structurally obsolete as intra-African trade deepens.

The geopolitical stakes further underscore the urgency of modernization. Unless the United States revitalizes its relationship with Africa through trade and investment, the continent will deepen its partnership with geopolitical competitors.⁹ This threat is not abstract. Beginning May 1, 2026, China has announced a zero-tariff policy for 53 African nations, a structural shift that will strengthen Beijing's soft power through an increased economic position, while increasing competition for critical mineral access and supply chain integration. AGOA's uncertain renewal status has already contributed to a decline in trade and investment beginning in 2023, particularly in the textile and apparel sector.

⁵ Luke, David. "How Has the African Growth and Opportunity Act (AGOA) Benefited African Countries?" World Economic Forum. November 16, 2023. <https://www.weforum.org/stories/2023/11/africa-us-trade-agoa-deal-expires-2025/>

⁶ World Economic Forum. "How Has the African Growth and Opportunity Act (AGOA) Benefited African Countries?" World Economic Forum. November 16, 2023. <https://www.weforum.org/stories/2023/11/africa-us-trade-agoa-deal-expires-2025/>

⁷ World Economic Forum.

⁸ Schneidman; Dicharry.

⁹ Gary, Michael H.; Grant-Chapman, Hugh. "What's Next for AGOA?" Center for Strategic and International Studies, November 6, 2025 <https://www.csis.org/analysis/whats-next-agoa>

This has disrupted the long-term investment strategies of U.S. business that depend on duty-free access to African markets.¹⁰

The Trump administration has signaled awareness of this moment. USTR special counsel Jamieson Greer expressed the administration's intention to work with Congress to "modernize the program to align with President Trump's America First Trade Policy," with particular attention to U.S. market access and the reduction of non-tariff barriers in Africa.¹¹ As Oge Onubogu has argued, a short-term renewal alone is insufficient; a comprehensive reimagining of AGOA is necessary as a 21st century partnership framework spanning trade, investment, capacity building, and supply chain integration. The following sections outline the specific structural problems within the current framework and offer concrete recommendations for how a modernized AGOA can advance both U.S. and African interests in the decades ahead.

Problems within the Current AGOA Framework

1. Eligibility and Graduation

Under the current AGOA framework, eligibility is reviewed on an annual basis, requiring participating countries to consistently demonstrate progress towards establishing market-based economies, rule of law, political pluralism, and protection of intellectual property. Other key criteria push for the elimination of barriers to U.S. trade and investment in AGOA countries as well as promote development by requiring countries to enact policies aimed at reducing poverty, increasing healthcare and education opportunities, protecting human and worker rights, and eliminating certain child labor practices.¹² Thomas Sheehy, former Staff Director of the Committee on Foreign Affairs in the U.S. House of Representatives points out that at AGOA's origin, these criteria were intended to add conditionality to the program, so that rather than offering trade preferences gratis, the U.S. would use AGOA to push for better treatment of U.S. investors and movement towards governance reforms in Sub-Saharan Africa.¹³

While these goals were well-intentioned, AGOA eligibility criteria based on governance practices and human rights are a major point of criticism against the current AGOA framework. This resistance stems from the concern that human rights criteria are not implemented fully nor consistently. Andrew Rechenberg, Senior Economist at the

¹⁰ Onubogu, Oge. "AGOA's Uncertain Future: What's at Stake for US-Africa Trade?" Center for Strategic and International Studies, October 1, 2025, <https://www.csis.org/analysis/agoas-uncertain-future-whats-stake-us-africa-trade>

¹¹ Office of the United States Trade Representative, "Statement from Ambassador Jamieson Greer on the Reauthorization of the African Growth and Opportunity Act," Office of the United States Trade Representative, February 3, 2026. <https://ustr.gov/about/policy-offices/press-office/press-releases/2026/february/statement-ambassador-jamieson-greer-reauthorization-african-growth-and-opportunity-act>

¹² "General Country Eligibility Provisions." AGOA Eligibility. Accessed April 19, 2026. <https://legacy.trade.gov/agoa/eligibility/>.

¹³ Sheehy, Thomas. interview by Anastasiya Kolosovsky and Katherine Riley, March 25, 2026.

Coalition for a Prosperous America, highlights that countries like Eswatini, Rwanda, and Nigeria continue to benefit from AGOA despite their shortcomings in these criteria, which, according to him, sends the message that “human rights enforcement under AGOA is driven more by political convenience than principle”.¹⁴ This uneven application is highlighted in trade practices outside the African continent. Stephen Lande, former senior trade negotiator at the USTR, argues that Sub-Saharan countries generally have higher labor standards than China or Bangladesh, and yet the U.S. continues to trade with those countries.¹⁵ This creates the impression that only Sub-Saharan African countries are being held to standards of good governance and human rights, while other U.S. trade partners are not expected to meet these standards. Sheehy’s aforementioned argument for maintaining eligibility criteria offers a counter to this claim as the US does not have leverage to dictate such requirements for countries such as China and Bangladesh.

Furthermore, the consequences of eligibility loss on Sub-Saharan African countries may ultimately counter U.S. government intentions. An example of this is Ethiopia, for which eligibility suspension resulted in a loss of around 11,500 jobs.¹⁶ In Ethiopia, revoking AGOA eligibility detrimentally impacted an already disenfranchised population. This abrupt withdrawal also resulted in a loss of market access, adversely impacting U.S. companies. If the U.S. seeks to incentivize institutional change towards development in Sub-Saharan Africa, it must explore more effective methods that encourage government compliance as opposed to punishing countries as units.

In order to address the undesirable consequences of eligibility loss, Witney Schneidman of the Brookings Institute suggests the targeted sanctioning of sectors and individuals in order to punish those who are responsible for violations of human rights and governance criteria, which is a component proposed in the Coons-Risch AGOA renewal legislation of 2024.¹⁷ According to Beth Hughes of the American Apparel and Footwear Association, U.S. companies importing goods from Africa do not only judge purchases based on price. Other criteria that U.S. apparel and footwear companies consider include whether the quality of goods meets said company’s ESG (Environmental, Social, Governance) goals.¹⁸ Thus, any relaxation of AGOA eligibility criteria by the U.S. government will not automatically lead to regression in human rights and governance in African countries. Instead, incentives for reform will derive from the U.S. private sector. By implementing more targeted consequences and decreasing emphasis on these criteria within AGOA eligibility, the U.S. can address the inefficacy of the current AGOA eligibility evaluation in impacting society in Sub-Saharan Africa. This step should not be considered

¹⁴ Rechenberg, Andrew. “Why the United States Should Not Renew AGOA,” Coalition for a Prosperous America, July 30, 2025, <https://prosperousamerica.org/rechenberg-why-the-united-states-should-not-renew-agoa/>.

¹⁵ Lande, Stephen; Carroll, Anthony. interview by Anastasiya Kolosovsky and Rita Grace Srinivasan, April 8, 2026.

¹⁶ Staff Reporter. “Ethiopia Loses 11,500 Jobs, 18 Foreign Companies Following Agoa Suspension.” The Reporter Ethiopia, February 15, 2025. <https://www.thereporterethiopia.com/43838/>.

¹⁷ Schneidman, Witney. interview by Anastasiya Kolosovsky, Anabelle Finegan, and Rita Grace Srinivasan, March 18, 2026.

¹⁸ Hughes, Beth. interview by Anastasiya Kolosovsky, March 7, 2026.

an abandonment of the value of the original criteria, but rather a new approach that is more sensitive to the impact that eligibility loss has on the general population.

A second issue that stands out within criticism of AGOA eligibility is its review cycle. Currently, AGOA eligibility is reviewed on an annual basis. While this short period ensures regular oversight and allows the U.S. government to respond quickly to changing political or economic factors, it can also create unintended instability for international trade among businesses and investors, who rely heavily on long-term predictability when making sourcing and investment decisions. The annual review cycle may encourage short-term, surface-level compliance rather than sustained structural reform, as governments focus on meeting immediate problems rather than implementing greater institutional changes. To address these challenges, a key reform suggested by Sheehy would be extending the review cycle to every three years, supplemented by mid-cycle monitoring and the possibility of emergency reviews in cases of major political disruptions or human rights violations.¹⁹ This adjusted timeline would strike a balance between accountability and stability, allowing countries sufficient time to enact meaningful reforms while maintaining U.S. oversight.

DHS Tiered system suggestion:

The Economic Counselor for the Embassy of Chad in the U.S. Abderahman Hassane, suggested structuring the AGOA eligibility framework similar to that of the tiered system of the Department of Homeland Security's visa renewal model as a policy template. DHS's visa renewal and status maintenance framework - most visibly applied in the Trafficking in Person (TIP)²⁰ report tier system and in the Temporary Protected Status (TPS)²¹ review process - offers a structurally superior model for managing conditionality in trade preference programs compared to the current structure of AGOA. At its core, this approach recognizes a fundamental principle that AGOA's current binary eligibility mechanism ignores: that remediation takes time, that supply chains cannot absorb overnight disruption, and that the purpose of conditionality is government behavioral change rather than punishing a countries' working population.

The TIP Report's three-tier structure is instructive. Tier 1 countries meet minimum standards for eliminating trafficking. Tier 2 countries are making significant efforts but have not yet met minimum standards. Tier 2 Watch List countries are given a defined period - typically two years before automatic downgrade to Tier 3 - to demonstrate progress. Tier 3 countries face restrictions on non-humanitarian assistance. Critically, countries placed on the Watch List receive enhanced diplomatic engagement, technical assistance offers, and a transparent roadmap of what compliance requires. This system is not punitive in its design, rather, it is corrective, with gradual consequences that match

¹⁹ Sheehy.

²⁰ "2025 Trafficking in Persons Report." n.d. United States Department of State. Accessed April 26, 2026. <https://www.state.gov/reports/2025-trafficking-in-persons-report/>.

²¹ "Temporary Protected Status | USCIS." March 17, 2026. <https://www.uscis.gov/humanitarian/temporary-protected-status>.

the severity and intractability of the violation. The proportionality principle is embedded in the system design. AGOA currently operates as if every violation is an "expellable" offense, regardless of severity, which is why a trade dispute over used clothing (Rwanda, 2018) and a military coup (Mali, 2022) triggered the same response: full suspension, immediately effective.

Proposed Three-Tier Framework

Tier A - Fully Eligible. A country in Tier A has passed the annual AGOA review across all eight eligibility criteria: market-based economy, rule of law, elimination of barriers to U.S. trade and investment, protection of intellectual property, transparent regulatory environment, worker rights and labor standards, anti-corruption measures, and protection from gross violations of internationally recognized human rights. Tier A status confers full duty-free access across all AGOA preference categories, eligibility for investment compact bonus preferences, and access to U.S. DFC financing guarantees for AGOA linked manufacturing projects.

Tier B - Probationary Buffer. When the annual review identifies a violation of one or more eligibility criteria, the country enters Tier B rather than facing immediate full suspension. The Tier B designation carries several important features. First, preferences are maintained on sectors not directly implicated in the violation. If a country's labor rights record has deteriorated in one industry sector, AGOA preferences in unrelated sectors remain in force for the duration of the remediation window. The principle, borrowed directly from the TIP Report's approach of restricting specific categories of non-humanitarian assistance rather than all assistance, prevents everyday workers in compliant industries from bearing the economic cost of government-level violations. Second, a formal 3-year remediation clock begins at the point of Tier B entry, with annual benchmarks set collaboratively by USTR, the State Department Bureau of African Affairs, Department of Commerce, and critically the beneficiary government itself. The benchmarks must be specific, measurable and achievable.

Tier C - Ineligible. A country reaches Tier C only after failing to remediate the identified violations within the full 3-year Tier window, or immediately in cases of egregious violations as defined by a specific and narrow statutory list - mass atrocities, meeting the threshold of crimes against humanity, or state-directed violence against civilian populations. The statutory definition of "immediate Tier C violations" is itself a reform: currently, AGOA's eligibility criteria are broad enough that virtually any governance deterioration can trigger suspension, creating unpredictability and the potential for politically motivated determinations. In Tier C, all AGOA preferences are suspended. Re-entry requires a formal application process, not automatic reinstatement upon political change. The re-application process requires a minimum demonstrated compliance record of two consecutive years and a specific remediation plan accepted by the USTR. The two-year minimum is designed to prevent the pattern seen with

Madagascar, where reinstatement followed political transition without meaningful institutional reform, and where similar governance weaknesses later recurred.

Supply Chain Protection with Tiered System:

The single most important operational feature of the tiered framework, and the feature most directly analogous to the DHS visa renewal approach, is the protection of established economic relationships during the review period. Just as a visa holder in status renewal proceedings retains the right to work and reside while the review is pending, an AGOA beneficiary country in Tier B retains the right to export under preference in non-implicated sectors while the remediation clock runs.

The existing supply chains built on AGOA preferences are not abstract policy artifacts - they represent the livelihoods of hundreds of thousands of workers, employed in export-oriented manufacturing. In Lesotho, approximately 36,000 workers - representing the country's largest formal employment sector - depend directly on AGOA apparel preferences. In Kenya, an estimated 50,000 to 60,000 workers are employed in AGOA-linked garment factories. In Madagascar, the AGOA apparel sector was rebuilt from near-zero between 2014 and 2022 after reinstatement, representing an investment of hundreds of millions of dollars in factory infrastructure. Full suspension dislocates these supply chains within months. Factories close, equipment is liquidated, U.S. importers secure alternative sources elsewhere, and the supply chain does not readily reconstitute when eligibility is restored. Madagascar's post-2014 recovery, which took a full eight years to reach pre-suspension levels, demonstrates how asymmetric the cost of destruction versus rebuilding is.

The Tier B framework addresses this by applying the DHS principle of status continuity during review. The workers in Lesotho's garment factories did not vote for the government policy that triggered AGOA review, and they should not bear the economic consequence of it. Sectoral preference maintenance during Tier B remediation is the mechanism that protects them.

Graduation:

AGOA eligibility framework has received widespread criticism concerning country graduation from the program. Currently, countries that reach a higher level of economic development, often measured by GDP thresholds, graduate from AGOA eligibility. However, there is no structured transition process for countries that achieve this level of success, and once they “graduate,” they lose access to AGOA benefits abruptly despite the program’s original intent to promote sustained economic growth.²² This sudden loss of preferential trade access can disrupt key export industries, deter investment, and create uncertainty for both domestic producers and international partners. Rather than effectively rewarding economic progress, the current system risks penalizing countries

²² Reinsch, William Alan. “What’s Agoa-Ing On.” Center for Strategic and International Studies.. <https://www.csis.org/analysis/whats-agoa-ing>

that have successfully leveraged AGOA to expand their economies. An alternative perspective on this issue offered by Matthew Quigley, a Foreign Commercial Service Officer at the ITA, that ultimately, investors should not be deterred from investment in Africa by potential AGOA eligibility loss because the GDP growth required for graduation makes investment in the country more valuable.²³ This means that graduation in itself is not the problem. Rather, the sudden loss of trade preference impacts business strategy and finance, so it would be best to make the process more gradual.

A solution suggested by Schneidman and incorporated in the proposed Coons-Risch 2024 renewal bill is to expect AGOA beneficiaries to maintain a GDP level above the graduation threshold consistently for five years.²⁴ This would give U.S. businesses operating in AGOA a buffer period to transition to a strategy that does not rely on preferential trade treatment. It would also allow AGOA members to demonstrate stability in their economic growth before stripping them of the preferential treatment that allows them to develop. One option for a post-AGOA trade relationship between Sub-Saharan African countries and the U.S. is a free trade agreement, suggested by Rechenberg.²⁵ While this could facilitate trade and development with this region, an alternative idea expressed by Eduardo Castellet Nogués, a Non-Resident fellow at Trends Research and Advisory, is to establish a mutual recognition agreement with AGOA graduating states, as this would not require ratification from the Senate in the way a free trade agreement would.²⁶

2. Geographic Expansion and AfCFTA Alignment

Expanding AGOA's rules of origin to encompass North African states would establish an important structural shift in a reformed framework. Such expansion would correct a fundamental inconsistency in U.S-Africa trade policy by aligning with the continent's prevailing trajectory toward economic integration under the AfCFTA. The AfCFTA was established in March of 2018 and aims at creating a single, liberalized market for goods and services across the African continent.²⁷ The AfCFTA also serves as one of the most important developments to have taken place on the African continent since AGOA's last renewal, and with comprehensive overlapping economic objectives. As such, a more coherent and comprehensive trade infrastructure would enable smoother regional commerce, reduce trade fragmentation, strengthen supply chains, and deliver strategic economic value to the United States while expanding growth opportunities for current AGOA member states. Schneidman noted that aligning AGOA with the AfCFTA is critical to achieving economic diversification and sustained reductions in poverty and inequality. AGOA is a developmental program that stretches beyond a traditional trade-preference agreement. Expanding eligible states to include those in Northern Africa will ultimately

²³ Quigley, Matthew. interview by Lulu von Sauer and Anastasiya Kolosovsky, March 27, 2026.

²⁴ Witney, interview.

²⁵ Rechenberg, Andrew. interview by Anastasiya Kolosovsky and Rita Grace Srinivasan, March 3, 2026.

²⁶ Castellet Nogués, Eduardo. interview by Anastasiya Kolosovsky and Alexandra Zischke, March 7, 2026.

²⁷ African Union. "African Continental Free Trade Area (AfCFTA)." African Union au.int/en/african-continental-free-trade-area

benefit the African continent as a whole.²⁸ John Mukum Mbaku of the Brookings Institute similarly argues that the current distinction between Sub-Saharan and North Africa creates artificial borders that hinder true continental integration. However, there is some push back on this idea. Cory O’Hara, Director of Africa at the Milken Institute, stated that including North Africa, which already encompasses a free trade agreement with Morocco and open trade industrial zones with Egypt, could prove to be a laborious initiative with minimal tradeoff.²⁹ Deepening economic ties with North African states also allows the U.S. to grow its influence in a region where competitors like China have made immense inroads through trade and investment. Given regional geopolitical trends similar to those across Sub-Saharan Africa, the U.S can position itself as a more attractive enduring partner and gain meaningful long-term leverage and influence while strengthening the foundation of continental African collaboration.

3. Limited Usage by African Beneficiaries

A persistent and underexamined problem within AGOA is the gap in potential AGOA benefits and actual usage by AGOA-eligible states. Currently AGOA usage has declined significantly, with total U.S. imports under the program dropping from \$9.3 billion in 2023 to \$8 billion in 2024.³⁰ This trend reflects a broader structural challenge: many African countries lack the infrastructure, institutional capacity and market knowledge to optimize their participation in the program. There is also a widespread misconception that AGOA is primarily an apparel sector program, rather than a broad-based trade preference framework applicable across agricultural, manufacturing, minerals, and service sectors.

To address this gap, the reformed AGOA could incorporate a structured consulting mechanism - potentially staffed by trade specialists with U.S.-trade experience - available on an opt-in basis to eligible countries. These consultants would assist governments in identifying underutilized sectors, aligning domestic production within U.S. market demand, and tailoring export strategies to the specific comparative advantages of each country. By placing the onus on African governments to opt in, this model preserves sovereignty and creates a meaningful incentive for self-directed reform. In the long term, this consulting infrastructure could also help diversify the commodity composition of AGOA trade and address the current concentration in oil.

The concept of comparative advantage is a critical factor not currently being taken into full consideration within the AGOA framework. In the 2015 renewal, Schnideman mentions that USTR created utilization strategies that outlined how states could better capitalize from their comparative advantages and multiply imports to the U.S. This proved

²⁸ Mukum Mbaku, interview.

²⁹ O’Hara, Cory. interviewed by Anastasiya Kolosovsky, April 10, 2026.

³⁰ “AGOA + GSP Exports to the United States.” AGOA.info. Accessed April 22, 2026. <https://agoa.info/data/trade.html>.

effective for those countries that committed to their respective strategies.³¹ Both Mabedi T. Ngwenya³², the acting Ambassador at the Embassy of Botswana, and Abderahman Hassane³³, the Economic Counselor at the Embassy of Chad, suggested that AGOA could be better leveraged to increase U.S. sourcing of agricultural products from countries like Chad and Botswana.

A focus on comparative economics would help address this decline by moving beyond the concentration in the oil and apparel sectors - which made up 25%³⁴ and 15%³⁵ respectively in 2024. By deploying specialized consultants to help African governments tailor export strategies to their specific comparative advantages, countries could better align their domestic production with U.S. market demand. This approach would allow nations to exploit underexplored opportunities in sectors like mechanized agriculture, digital finance, and value-added mineral processing. Which would ideally lead to fostering the industrialization and export diversification that the program was originally designed to achieve.

4. Investment

Supporting and encouraging U.S. investment across Africa should be highlighted within the new AGOA framework. Increased U.S. investment is mutually beneficial: AGOA-eligible countries gain resources to amplify production and export capacity, while the United States strengthens the supply chain and economic relations that serve its economic and national security interests.³⁶ One of the most significant barriers to greater U.S. investment is the distorted perception of risk premium associated with African markets. Imani Jaoko a Development and Finance Practitioner who has worked for the Eurasia Group and the World Bank in Kenya notes that while many African countries carry poor sovereign credit ratings, they consistently receive less investment than other regions with equivalent ratings; suggesting that investor hesitation is driven more by perception than data. She argues that the U.S. government must differentiate between real and perceived risk by taking an active role in documenting and disseminating African success stories, and in deploying government-backed data to demonstrate the viability of these markets.³⁷

Historically, U.S. commercial engagement in Africa has been concentrated in raw material extraction, crude oil from Nigeria, minerals from Zambia, and similar extractive industries. Imani Jaoko emphasizes that significant, underexplored opportunities exist well beyond this narrow band. Jaoko suggests that the U.S. should pivot toward sectors

³¹ Schneidman, interview.

³² Ngwenya, Mabedi T.. interview by Lulu von Sauer, April 2, 2026.

³³ Hassane, Abderahman. interview by Lulu von Sauer, March 17, 2026.

³⁴ Congress. "African Growth and Opportunity Act (AGOA)". February 17, 2026.

³⁵ UN Trade and Development. "AGOA expiry impact on African export diversification." Accessed April 22, 2026 unctad.org/news/agoa-expiry-impact-african-export-diversification.

³⁶ Congressional Research Service. African Growth and Opportunity Act (AGOA). IF10149, Library of Congress, 28 Feb. 2025, <https://www.congress.gov/crs-product/IF10149>

³⁷ Jaoko.

like finance, banking, and the mechanization of agriculture. For instance, in Kenya, the agricultural sector could serve as a powerful engine for growth. Such investment would not only improve food security but would also connect U.S. firms to a rapidly growing consumer base, a burgeoning class of service workers, and high-quality land for large-scale agricultural production.³⁸

Recent infrastructure projects financed by DFC underscore how targeted funding can help correct misperceived risk and catalyze private capital flows into African markets. In Angola, DFC's \$553 million commitment to the Lobito Corridor's rehabilitation connects the DRC and Zambia to Atlantic ports.³⁹ A large percentage of exports from the Lobito Corridor will flow directly to the United States.⁴⁰ In Burundi, DFC support for the Mubuga Solar Power Station, adding roughly 7.5 MW of capacity, marks a major step in expanding national energy infrastructure. More recently DFC has committed to providing financing support for the development of an 83.5MW combined cycle thermal power plan, further demonstrating DFC's role in de-risking foundational infrastructure sectors. Scaling DFC financing toward port modernization, such as upgrading container capacity and logistics, could significantly increase AGOA utilization. In parallel, expanding DFC-backed investment to critical mineral processing infrastructure, particularly in the copper and cobalt, could shift African economies up the value supply chain, aligning with U.S. diversification goals while driving higher value exports under an adapted AGOA framework.⁴¹ Critical mineral processing and port modernization funding from DFC would better support the supply chain needs of AGOA.

Beyond infrastructure there is also the opportunity to push for raw materials to be processed within the African states from which they originate, which could help to slow Chinese influence. A major challenge to increasing U.S. investment through AGOA is the perceived imbalance in trade benefits, particularly concerning the role of China as a "middleman" in African supply chains. Critics such as Andrew Rechenberg represent the legislative opposition that views current trade policies as overly transactional and potentially harmful to U.S. domestic interests. A primary target for this criticism is the third-country fabric provision, which allows AGOA-eligible countries to export textiles to the U.S. duty-free even when the raw materials are sourced from non-AGOA countries like China.⁴² In countries like Kenya, over 85% of raw materials for the textile industry are imported from China,⁴³ meaning U.S. trade preferences are effectively supporting Chinese fabric markets while the U.S. remains the largest end-customer.

5. Critical Minerals

³⁸ Jaoko, Imani. interview by Anastasiya Kolosovsky, March 30, 2026.

³⁹ "Annual Report 2024." U.S. International Finance Development Corporation. Accessed April 28, 2026. https://www.dfc.gov/sites/default/files/media/documents/DFC_AnnualReport_2024_final_508.pdf.

⁴⁰ MacDonald, Alex. interviewed by Lulu von Sauer, April 2026.

⁴¹ "Annual Report 2024."

⁴² Rechenberg.

⁴³ "Textiles in Kenya." The Observatory of Economic Complexity. Accessed April 22, 2026. <https://oec.world/en/profile/bilateral-product/textiles/reporter/ken>.

In terms of critical minerals, AGOA has the potential to move mineral processing to Africa and out of China, as well as build a stronger partnership between the U.S. and Sub-Saharan African countries for further trade in critical minerals. Keeping in mind the current administration's emphasis on an "America First" policy, stronger engagement with Africa's critical minerals sector would allow the U.S. to diversify sourcing of critical mineral imports while reducing dependence on geopolitical competitors. This is a national security concern, since critical minerals are utilized in U.S. defense systems.⁴⁴ At the same time there is uncertainty regarding AGOA's strong connection with Africa's extractive sectors and its negative implications for African development, which means that a renewed AGOA must forge new avenues for critical mineral imports that serve both the developmental interests of Sub-Saharan African states and U.S. national and security interests.

First, AGOA should not concentrate on critical minerals in their raw form. AGOA member states host a sizable percentage of the world's critical mineral reserves, such as manganese (70%), platinum group metals (89%), cobalt (54%), graphite (23%), and copper (10%),⁴⁵ which are used in technology and manufacturing. However, as Sheehy highlights, raw minerals already enter the U.S. duty-free, so AGOA in its current form does not have a meaningful impact on critical mineral imports. This emphasizes that AGOA's value as a program for obtaining raw critical minerals would not garner support in the U.S.⁴⁶

Furthermore, Rechenberg critiques the current AGOA model for perpetuating the "resource curse" in Sub-Saharan African states, reinforcing dependence on raw materials and extractive industries that historically contribute to authoritarianism, conflict, and instability rather than development.⁴⁷ His sentiment is echoed by African leaders, who are concerned that their economies are being reduced to "extractive hubs" with limited job creation and domestic benefit. The impact of AGOA's high utilization for trade in raw materials is twofold. Not only does it negatively impact Sub-Saharan African states in their economic development by strengthening their reliance on exporting raw materials and slowing the growth of job opportunities, it also works against the normative efforts of AGOA to promote good governance practices and human rights protections.

Instead, AGOA should work to expand local processing capacity, which would not only increase economic returns but also support broader industrialization across the continent. For actionable solutions, this could appear within AGOA legislation as duty-free import provisions for critical minerals in their processed form. If AGOA members are encouraged to develop the infrastructure for processing critical minerals and import critical minerals in value-added form, this would benefit the region by spurring job

⁴⁴ Sadler, Brent. "The Energy Terrain: Chokepoints, Crude, and Coalition Leverage" (Conference lecture, 2026 Naval Academy Foreign Affairs Conference, Annapolis, MD, April 9, 2026).

⁴⁵ Baskaran, Gracelin. "Why Is Renewing AGOA Strategic for U.S.-Africa Minerals Diplomacy?" Center for Strategic and International Studies, September 3, 2025,.

⁴⁶ Sheehy.

⁴⁷ Rechenberg 2025.

growth and breaking out of the previously mentioned “resource curse” that critics fear. While keeping critical mineral processing in the region falls within the interests of AGOA as a result of industrialization and job growth, this change also addresses key U.S. national and security interests for access to critical minerals.

Broadening AGOA to encompass processed critical minerals also closely connects to U.S. national interests, because of its geopolitical competition with China. Lande points out that currently, AGOA members export 85% of their raw critical minerals for processing in China.⁴⁸ As a way to decrease reliance on China, Anthony Carroll, Nonresident Scholar of the Carnegie Africa Program, proposes that AGOA members could move up the value chain and export intermediate products in sectors such as the battery supply chain.⁴⁹

Not only can AGOA benefit the U.S. by diversifying supply chains, but it can also serve as a foundation for a strategic partnership that unlocks access to critical minerals for the United States. It is especially important because Beijing has continued to expand economic influence across the African continent. As earlier referenced, China plans to implement a zero-tariff policy for 53 African countries, marking a major structural shift that would give China an advantage in economic relations and imports of critical minerals.⁵⁰ Although the U.S. may be unable to present AGOA member states with trade relations that rival those offered by China, AGOA can help grow the relationship between the U.S. and member states. Lande offers the example of the Congolese agreement on supply of critical minerals, which gives the U.S. rights for first bid, as an example of how AGOA could be transitioned into a more bilateral agreement that not only supports development in Africa but achieves U.S. national and security interests.⁵¹ In return for duty-free access to U.S. markets, the United States can ask that African countries offer greater access to their mineral supplies. This would not only benefit both AGOA member states and the U.S., but also align with the current administration’s attempts to equalize trade terms with U.S. partners. Overall, critical minerals are central to AGOA’s future relevance. Realizing their full potential will require a shift toward policies that support value addition, strengthen governance, and position the United States as a long-term, competitive partner in Africa’s evolving role within global supply chains.

6. Passing the Legislation through Congress

Historically, AGOA has commanded broad bipartisan support. In 2015, AGOA extension passed the Senate 76-22 and the House 286-138, demonstrating that the Act is

⁴⁸ Lande; Carroll.

⁴⁹ Lande; Carroll.

⁵⁰ Okebiorun, Olamilekan. “After US Extends AGOA, China Finally Agrees Zero-Tariff Access for 53 African Nations.” *Business Insider Africa*, 14 Feb. 2026, <https://africa.businessinsider.com/local/markets/after-us-extends-agoa-china-finally-agrees-zero-tariff-access-for-53-african-nations/zfkdvj>

⁵¹ Lande; Carroll.

not ideologically partisan at its core ("Actions - H.R.1295 - 114th Congress").⁵² That tradition of bipartisan engagement has continued into the recent legislative cycle. On the Senate side, Senator Chris Coons (D-DE) and Senator James Risch (R-ID) co-sponsored the AGOA Renewal and Improvement Act of 2024⁵³, while Senator John Kennedy (R-LA) introduced stand alone AGOA extension legislation in both 2023 and 2025. In the House, Representative John James (R-MI) proposed the AGOA Extension and Enhancement Act of 2024⁵⁴, and Representative Jason Smith (R-MO) introduced the AGOA Extension Act in 2025.⁵⁵ Of these bills, only Representative Jason Smith's has advanced beyond committee, passing the full House; the remainder have been referred to the Senate Committee on Finance or the House Subcommittee on Trade where they await further action.

Despite this record of support, several structural hurdles remain. First is the problem of legislative inaction. AGOA does not occupy the foreground of congressional attention, and without sustained advocacy from dedicated members, it risks languishing in committee. Thomas Sheehy identifies Senator Chris Coons as having been the program's most reliable champion, but argues a renewed AGOA framework requires a prominent Republican advocate willing to bring the case directly to the White House and articulate clearly that this legislation advances U.S. economic and strategic interests under the current administration's framework.⁵⁶ The second obstacle to AGOA is expressed by Beth Hughes, who says that AGOA renewal often gets attached to a larger "omnibus bill" because of its bipartisan nature, combining multiple items of legislation under a single vote and thus making negotiation much more difficult.⁵⁷ A more efficient approach would be to attempt to pass AGOA without attachments that are irrelevant to the nature of the bill, but this may be beyond the capacity of the Department of State. However, one prospective avenue for the Department of State is proposed by Lande, who suggests that the United States should utilize a single government approach to AGOA through the cooperation of the many committees and offices that make up the United States government.⁵⁸ Currently, various departments and offices interact with AGOA on different levels, so bringing together their work could help streamline its movement through Congress.

Furthermore, for AGOA to pass the scrutiny of the Trump administration, its aligning value as an "America First" policy must be stressed. One such aspect is U.S. retail reliance on the bill. Beth Hughes states that U.S. producers rely on AGOA not just to

⁵² Actions - H.R.1295 - 114th Congress (2015-2016): Trade Preferences Extension Act of 2015 | congress.gov | library of Congress. Accessed April 28, 2026. <https://www.congress.gov/bill/114th-congress/house-bill/1295/actions>.

⁵³ "S.4110 - 118th Congress (2023-2024): AGOA Renewal and Improvement Act of 2024." Congress.gov, Library of Congress, 11 April 2024, <https://www.congress.gov/index.php/bill/118th-congress/senate-bill/4110>.

⁵⁴ "H.R.10366 - 118th Congress (2023-2024): AGOA Extension and Enhancement Act of 2024." Congress.gov, Library of Congress, 17 December 2024, <https://www.congress.gov/bill/118th-congress/house-bill/10366>.

⁵⁵ "H.R.6500 - 119th Congress (2025-2026): AGOA Extension Act." Congress.gov, Library of Congress, 10 February 2026, <https://www.congress.gov/bill/119th-congress/house-bill/6500>.

⁵⁶ Sheehy.

⁵⁷ Hughes.

⁵⁸ Lande; Carroll.

diversify their supply chains, but also to support production. The retail brands that rely on AGOA states as suppliers employ many people across levels of production in the U.S., with women composing a large part of that workforce.⁵⁹ This means that, although AGOA offers preferential trade terms to import goods from Sub-Saharan Africa, United States citizens reap benefits through employment in companies further up the supply chain. Additionally, within the defense sector, Africa is also seen as a critical flashpoint for resource security, especially as the defense industry and military attempt to move away from Chinese rare earth minerals. Brent Sadler’s emphasis on moving processing facilities and mining dependence from China to countries in Africa is evidence of the fact that strengthening trade relations with Africa is within the interests of the “America First” policy, since it would support the United States in its geopolitical competition with China, especially in the sector of critical minerals.⁶⁰ A third aspect of AGOA’s benefit to U.S. national interests is the opportunity it creates to collaborate with Sub-Saharan African states as a unit. Stephen Lande points out that the United States can use AGOA as a vehicle to work with many African countries at once, instead of pursuing multiple different agreements and working with countries independently.⁶¹ This ensures that the United States can build soft power in the long term due to African states representing a large international block in groups such as the African Union. So, when the U.S. seeks support from states in multilateral negotiations, such as the World Bank, it can gain votes from the African continent and strengthen its position.

Moreover, AGOA renewal offers the potential to move beyond its traditional unilateral framework toward a more reciprocal investment oriented model. While AGOA has historically provided preferential access to U.S. markets for African exports, there is growing recognition that future iterations should incorporate elements of bilateral engagement to better align with current global trade dynamics. One approach suggested by Andrew Rechenberg would be to create enhanced incentives for U.S. companies operating in African markets, potentially modeled after specific economic zones, alongside frameworks that promote reciprocal market access.⁶² This could help address concerns that existing trade arrangements are uneven, and serve to ensure that U.S. firms are not disadvantaged relative to competitors benefiting from preferential agreements with partners such as the European Union, an issue mentioned by Anthony Carroll.⁶³ Additionally, Stephen Lande argues for the value of incorporating structured supply agreements into the bill renewal, particularly in strategic sectors like critical minerals, since they would strengthen mutual economic benefits by guaranteeing U.S. access to key resources while supporting African export capacity.⁶⁴

⁵⁹ Hughes.

⁶⁰ Sadler.

⁶¹ Lande; Carroll.

⁶² Rechenberg, interview.

⁶³ Lande; Carroll.

⁶⁴ Lande; Carroll.

Additionally, Schneidman stresses that an important component within AGOA renewal is the need for a significant extended renewal timeline to provide predictability necessary for long term investment.⁶⁵ Beth Hughes points out that sectors such as textile and synthetic fabric production require capital intensive investments with a return period of seven years or more, making short-term renewals insufficient to attract sustained private sector engagement.⁶⁶ Sustained manufacturing development can only be achieved with a longer view into future access. A renewal period of at least 20 years would better align with investment cycles and offer the stability required for infrastructure development and supply chain diversification. Aligning AGOA's duration with other long-term trade frameworks could further reinforce policy credibility and encourage deeper economic integration between the United States and African partners.

It is also important to note that the current administration has yet to make a strong statement on the possibility of renewing AGOA. In consideration of ways to garner favor for AGOA from the administration, the idea of incorporating more "America First" language receives a mixed response. While Cory O'Hara warns about the dangers of making the bill highly partisan, and thus isolating parts of Congress,⁶⁷ Sheehy suggests that incorporating "America First" language into AGOA will not sway Democratic support for the bill because they will see the importance of what the bill does bilaterally for both Africa and the United States.⁶⁸ Adding "America First" language to AGOA could lead to the administration recognizing the importance of the act altogether for the United States and then passing it.

Recommendations

The following recommendations are ordered from most immediately actional to more ambitious structural reforms:

1. **Extend the AGOA renewal period to 20 years**, aligned with the USMCA framework, to provide the policy predictability necessary for long-term private sector investment and deal/investment framework. Without a renewal window of this length, U.S. apparel and footwear companies cannot justify the factory level capital expenditures that AGOA linked sourcing requires, given that return periods in capital-intensive manufacturing routinely exceed seven years. A long term renewal would also send a credible signal to African partner governments that the United States is committed to the relationship at a structural level - not merely until the next congressional calendar presents uncertainty. Passed as a standalone legislation rather than bundled into an omnibus bill, this renewal would also maximize AGOA's visibility and legislative momentum.

⁶⁵ Schneidman, interview.

⁶⁶ Hughes.

⁶⁷ O'Hara.

⁶⁸ Sheehy.

2. **Identify a senior Republican legislative champion** within administration proximity to serve as the primary advocate for AGOA before the White House and Senate leadership. Thomas Sheehy notes that while Senator Chris Coons has historically been AGOA's most reliable champion, the program's modernization requires a prominent Republican voice capable of making an explicit America First case for renewal directly to the current administration. Without such an advocate, AGOA risks languishing in committee regardless of its bipartisan underlying support, as it lacks the dedicated organizational infrastructure that other trade priorities command. The most effective framing for this advocacy - as Sheehy, Beth Hughes, and Stephen Lande all suggest - centers on critical mineral supply chain security, U.S. manufacturing employment up the supply chain, and the program's value as a vehicle for building African Union diplomatic alignment in multilateral forums.
3. **Reform the graduation mechanism** to phase out benefits gradually over a defined transition period, with pathways towards Mutual Recognition Agreements or sector specific trade arrangements for high-income graduates. The current system perversely penalizes economic success, removing preferences abruptly at the moment a country's growth trajectory should be attracting increased investment. Requiring countries to maintain GDP thresholds above the graduation level for five consecutive years before preferences are withdrawn would provide U.S. businesses with a meaningful buffer to restructure sourcing strategies without supply chain disruption. Defined post-graduation pathways toward bilateral trade arrangements would ensure that graduating countries remain integrated into the U.S.-Africa commercial relationship.
4. **Prioritize critical minerals processing within Africa**, extending duty-free treatment to value-added mineral products and supporting infrastructure development along key export corridors such as the Lobito Corridor. Because raw critical minerals already enter the United States duty free, the tariff gap on processed and value-added mineral products - as Tony Carroll and Thomas Sheehy both emphasize - is the only AGOA linked lever that meaningfully advances domestic African industrialization while simultaneously reducing U.S. dependence on Chinese processing capacity. Stephen Lande's observation that AGOA member states currently export approximately 85% of their raw critical minerals for processing in China underscores both the scale of the problem and the magnitude of the opportunity available through targeted duty-free expansion. Eduardo Castellet Nogués' proposal for \$10 billion EXIM Bank lending programs directed at mineral processing infrastructure represents the financing commitment necessary for the United States to compete credibly with China's resource-for-infrastructure model along corridors like Lobito.
5. **Transition re-eligibility process from annual to a tiered triennial system**, with annual monitoring and emergency review provisions retained for serious violations. The retrospective case studies of Madagascar, Ethiopia and Rwanda demonstrate that the current binary model has consistently produced outcomes disproportionate to the violations that triggered them, destroying employment bases that then required years to rebuild. A triennial review cycle, supplemented by mid-cycle monitoring and a narrowly defined statutory list of immediate suspension triggers would align

consequences with violation severity and create incentives for sustained, rather than cosmetic, governance reform.

6. **Strengthen investment facilitation tools**, including expanded use of the DFC, and a state-grants-plus-human-capital model to reduce investor risk perception and encourage private sector engagement. African markets consistently attract less investment than their sovereign credit ratings would predict and confirms that this is fundamentally an information and perception problem - one the U.S. government is well-positioned to address through targeted data dissemination, DFC deal visibility, and active documentation of African market success stories. The DFC should be more explicitly linked to AGOA eligibility and benefit structures, creating a coherent investment facilitation architecture rather than a set of disconnected instruments. A state-grants-plus-human-capital model - combining financing guarantees with workforce development support - would further reduce the risk calculus for U.S. firms considering first-time investment in AGOA-eligible markets.
7. **Align AGOA rules of origins with the AfCFTA**, including expansion to North African members, to promote intra-African supply chains, reduce dependence on third-country inputs, realign AGOA with development goals and align U.S. trade policy with continental economic integration. The current Sub-Saharan boundary creates artificial fragmentation that limits the scale of competitiveness and integration of the African supply chain relative to what U.S. competitors can access through China's expanding zero-tariff framework. Modernizing rules of origin to allow AfCFTA-sourced inputs to count toward preference thresholds would have an immediate practical effect, enabling regional textile and mineral supply chains that are currently structurally impossible under AGOA's input source requirements. Expansion to North African states should be sequenced carefully, beginning with countries already integrated into AfCFTA-linked supply chains to ensure that increased program scope translates to real trade gains rather than administrative complexity.
8. **Establish an opt-in trade consulting mechanism for eligible countries**, staffed by experienced U.S. trade professionals to improve AGOA utilization strategies and export diversification. Officials at the embassies of Chad and Botswana independently identified agricultural exports as a significantly underutilized AGOA opportunity, a sector where targeted consulting support could produce near-term diversification gains without requiring new legislative authority. Placing the mechanism on an opt-in basis preserves beneficiary sovereignty while creating a meaningful incentive for self-directed reform, avoiding the perception of condescension that mandatory technical assistance programs sometimes generate. In the longer term, this consulting infrastructure could serve as the institutional foundation for expanding AGOA trade beyond its current concentration in oil and apparel into sectors such as mechanized agriculture, digital finance, and value-added mineral products.
9. **Consider a specialized AGOA bureau or office** with the mandate to monitor program performance, coordinate within African states on eligibility progress, and produce annual impact reporting for Congress and the White House. Stephen Lande's

recommendation for a whole-of-government approach - bringing together USTR, State, Commerce, and DFC under coordinated AGOA leadership - would address the inter-agency fragmentation that currently slows both legislative progress and program implementation. A dedicated office would also provide the continuity that AGOA currently lacks, ensuring that each renewal cycle does not begin from scratch in terms of stakeholder relationships and program evaluation data. Without a permanent institutional home, AGOA's long-term effectiveness will continue to depend on individual champions rather than durable organizational infrastructure - a structural vulnerability that every renewal window exposes anew.

Interviews and Comments List and Bios

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