

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 Draxton México, S. de R.L. de C.V. (Draxton) facility in Irapuato, Guanajuato (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 rights of free association and collective bargaining.

This request for review encompasses:

- a. all actions taken by Draxton to retaliate against individuals based on union activity, including dismissals.
- b. all actions taken by Draxton to interfere in union activities tending to support, dominate, or control the *Sindicato Nacional de Trabajadores de la Industria Metal-Mecanica y del Acero, Similares y Conexas "Lic. Benito Pablo Juárez García"* part of *la Confederación de Agrupaciones Sindicales Mexicanas* (CONASIM-BJG) at the Facility, including demonstrating favoritism and giving CONASIM-BJG a role in hiring.
- c. all actions taken by Draxton or CONASIM-BJG that interfere with workers' rights to organize, select, and engage with a union of their choice, including actions to deter organizing efforts or support for the *Sindicato Independiente Nacional de Trabajadores y Trabajadoras de la Industria Automotriz* (SINTTIA), such as harassment, intimidation, threats, interrogation, coercive statements, and surveillance.
- d. all actions taken involving violence or threats of violence towards individuals engaged in SINTTIA organizing efforts for Draxton workers.
- e. the failure to provide workers with their 2022 collective bargaining agreement before or after the vote to approve the revised CBA.

The actions encompassed by this request for review include those of any person or entity, including Draxton and CONASIM-BJG, 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.<sup>1</sup>

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<sup>1</sup> 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.").