



**Request for Comments on the Operation of the Agreement between the
United States of America, the United Mexican States, and Canada
Docket number USTR-2025-0004**

**Post Hearing Rebuttal
Testimony of December 5, 2025
by Maria C. Werlau
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The following addresses questions and suggestions from the panel.

1. What would be the impact of eliminating the Cuban brigades?

- A. Denying the Cuban regime of these funds would significantly undermine Cuba's ability to sustain its repressive apparatus. The revenues (service exports) from the "internationalist missions" are the primary source of revenues reported officially by Cuba's Office of Statistics and, therefore, sustain a totalitarian regime that systematically violates all internationally recognized fundamental rights of Cuba's citizens. The Cuban government does not allocate the service export revenues to improving the standard of living and wellbeing of its citizens. In the six years from 2018 to 2023 (the most recent year reported by Cuba), less than 1% of export revenues from "human health services and social care services" were allocated, on average, to public health and social care, and only 1.3% of government investment was allocated to public health and social care.¹
- B. If Mexico requires for foreign doctors to effectively meet the health needs of its citizens, it can hire and pay the Cuban workers directly; there is no need to have the Cuban government as an intermediary that controls the workers and confiscates most of their wages.
- C. Cuba's public health system is in crisis and severely lacking doctors (particularly specialists), and nurses, as thousands are exported by the Cuban State as commodities under coercive conditions. Ending the internationalist medical missions would make them available to work in their own country, reunited with their loved ones on the island. The most recent edition of the Statistical Yearbooks of Health, for 2023, reported 80,763 physicians, representing 13,303 fewer than in 2022 and 12,065 fewer than in 2021; and 73,284 nurses, which is 6,285 fewer than in 2022 and 7,414 fewer than in 2021.²

¹ Maria C. Werlau, Las brigadas médicas cubanas: trabajo forzoso con fachada altruista - Compendio Informativo, Free Society Project/Cuba Archive, updated August 2025

² Ibid.

2. How exactly could the prohibition of forced labor trafficking of Cuban workers exported by the State be enforced?

Cuba's internationalist missions have unique characteristics and, in certain countries, the Cuban government implements creative measures to conceal the true nature of the agreements and the coerced wage confiscation. The following are recommended enforcement measures:

- A. Require that government to government agreements be made publicly available.
- B. Forbid agreements that require secrecy or confidentiality.
- C. Audit all financial records pertaining to the full cost structure and revenue flows of the Cuban brigades.
- D. Prohibit the host state from banning the independent hiring of Cuban workers outside of arrangements with the Cuban government.
- E. Require USMCA state parties to pass laws that prohibit agents of a foreign government from operating in the national territory to surveil, coerce, discipline, or threaten workers.
- F. Implement guidelines to screen potential or suspected victims of trafficking tailored to the Cuban situation, such as those published by Cuba Archive.³

³ Suggested guidelines for screening Cuban workers in third countries for forced labor / trafficking in persons, Cuba Archive, <https://cubaarchive.org/wp-content/uploads/2025/04/screening-cuban-workers-in-third-countries-for-trafficking.pdf>