



May 7, 2025

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**Docket No. 250414-0065**  
**BIS- 2025-0022**  
**XRIN 0694- XC120**

Board of Directors

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The Honorable Howard W. Lutnick  
Secretary  
United States Department of Commerce  
1401 Constitution Avenue, N.W.  
Washington, D.C. 20230

Re: Request for Public Comments on Section 232 National Security  
Investigation of Imports of Pharmaceuticals and Pharmaceutical  
Ingredients (XRIN 0694-XC120)

Executive Officers

Bill Bookout  
*President*  
  
Dale Metz  
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*The National Animal Supplement Council, Inc., Incorporated under Arizona Law, is a nonprofit trade association whose mission is to promote the health and well-being of companion animals and horses given animal health supplements by their owners and to protect and enhance the animal health supplement industry. NASC and its member companies work cooperatively with state, federal and international government officials to create a legislative and regulatory environment that provides a framework that is fair, reasonable, responsible, and nationally consistent. Such an environment of safety, accuracy and quality serves the interests of NASC members by ensuring ethical manufacturing and labeling practices are complied with throughout the industry. This approach serves the best interests of all stakeholders influenced by animal health supplements: manufacturers, marketers, distributors, retailers, regulators, veterinarians, consumers, and not least important, the animals themselves.*

Dear Secretary Lutnick:

The National Animal Supplement Council (NASC) appreciates the opportunity to provide comments related to the Department's *National Security Investigation of Imports of Pharmaceuticals and Pharmaceutical Ingredients*.

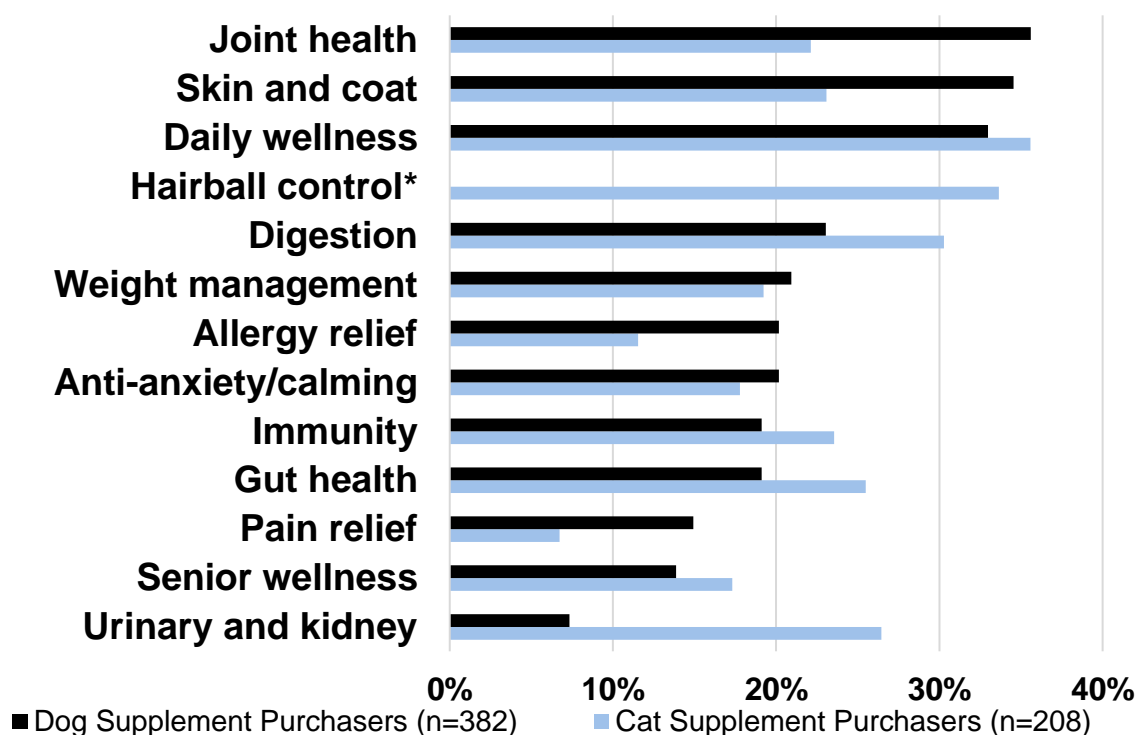
NASC is the largest trade association in the world representing over 450 member companies marketing products similar to human dietary supplements for the benefit of non-human-food-chain animals: primarily dogs, cats and horses. Our membership includes over 300 brands and over 150 suppliers of raw materials and contract manufacturing companies.

For nearly 25 years our organization has worked cooperatively and successfully to establish a responsible path for our member companies that is focused on quality, compliance, innovation and science. Working with regulatory agencies at both the federal level, with the FDA, Center for Veterinary Medicine and state regulators, the industry has thrived, growing in consumer spending from \$800 million in 2001 when NASC was founded to over \$3.5 billion today in the US alone.

As part of our overall efforts to help provide products critical to the health and longevity of companion animals and horses, supplements play a crucial role in helping animals live a long, happy, healthy life to the maximum degree possible. It is essential to support the animals and the industry by securing and maintaining a ready and affordable supply of critical ingredients, many of which are sourced overseas. Over 175 million dogs and cats and approximately 5 million owned horses depend on critical ingredients to support their health and well-being.

For example:

- Many animals, just like people, experience joint issues as they age, and products containing ingredients like glucosamine, chondroitin, MSM, turmeric, curcumin and others help older animals maintain normal functions throughout their lifecycle.
- Essential fatty acids and ingredients like biotin are critical as daily nutrients as well as helping maintain comfort and normal hoof growth for horses.
- Other beneficial products would be those for helping maintain normal cognitive function, behavior products, products for urinary tract health, cardiovascular support and immune health.



#### Marketplace Pet Owner Survey

Many of the ingredients required to produce animal supplements are identical to those used in the production of human dietary supplements and we work closely with human trade associations on critical issues which overlap in both industry sectors. To that end, I am attaching two lists of critical ingredients, which include, but are not necessarily limited to those referenced:

- The United Natural Products Alliance (UNPA), Loren Israelsen, President / Founder<sup>ii</sup>
- Natural Products Association (NPA), Daniel Fabricant, Ph.D., CEO / President<sup>iii</sup>

In addition, our organization also works with leading industry groups for animal food, treats, supplements and other products potentially impacted by these policy discussions. The coalition includes the American Pet Products Association (APPA), IndiePet, National Animal Supplement Council (NASC), Pet Advocacy Network (PAN), Pet Food Institute (PFI), Pet Industry Distributors

Association (PIDA), and World Pet Association (WPA). These collective efforts have been announced in both press releases as well as news articles.<sup>iv, v</sup>

To further illustrate the considerable economic and constituent impact we would point out the following:

- Pet Supplement Sales, US: ≈ \$5.0 billion annually<sup>vi</sup>
- Pet Food Sales, US: ≈ \$52 billion annually<sup>vii</sup>
- Pet Treat Sales, US: ≈ \$12 billion annually
- Human Dietary Supplements: ≈ \$65 billion annually

With only these categories considered, the impact is well over \$100 billion in the U.S. and it is estimated that the pet industry supplied an overall economic contribution of \$312 billion, which represents a 3% increase over 2023.<sup>viii</sup>

Pets are an extremely important to American families. Pet ownership in the U.S. has jumped significantly over the past three decades. As of 2024, 66% of U.S. households (86.9 million homes) own a pet. That's up from 56% in 1988, pet ownership statistics show. From companionship to emotional support, pets are a vital part of their owners' lives. In fact, 97% of pet owners consider their pets to be a part of their family.<sup>ix</sup> It is also estimated that on any given day pets can be found in approximately 80% of congressional offices.<sup>x</sup>

We greatly appreciate the Trump administration's emphasis on "Making America Healthy Again" and would extend this worthy objective to "Making Animals Healthy Again," as our collective futures are very much interdependent.

*In conclusion, it's important to highlight a critical and substantial distinction unique to the animal supplement industry: supplements and quality nutrition play a vital role in helping pets live longer, healthier, and happier lives—just as we strive to do for ourselves. If economic pressures on the supply chain make these products unaffordable, pet owners may lose access to essential tools that can help their animals thrive. Unlike human healthcare, we face the heartbreaking reality that we can humanely euthanize our pets. Even when done with compassion and in the animal's best interests, it would be most unfortunate if these lives were cut short due to financial barriers that have made products that can help unaffordable to animal owners.*

The NASC, along with our industry partners mentioned above, stands ready to provide any additional information that would be helpful for the benefit of all stakeholders; most importantly our extended family members, the animals themselves.

Very Sincerely,



William Bookout, President / Founder

WB:JP

Attachments

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<sup>i</sup> MarketPlace Pet Owner Survey, NASC Annual Conference, April 22-24, 2025, Columbus OH

<sup>ii</sup> UNPA Comments, 5.5.2025, Respectfully Submitted by Loren Israelsen, President / Founder

<sup>iii</sup> NPA Comments, 4.28.2025, respectfully submitted by Danial Fabricant, Ph.D., CEO / President

<sup>iv</sup> American Pet Products Association announcement, 5.6.2025, <https://americanpetproducts.org/news/new-coalition-forms-to-tackle-tariff-challenges-in-the-pet-industry>

<sup>v</sup> Pets + Magazine, 5.6.2025, [https://petsplusmag.com/new-coalition-forms-to-tackle-tariff-challenges-in-the-pet-industry/?utm\\_source=omeda&utm\\_medium=email&utm\\_campaign=Newsletter&utm\\_term=&utm\\_content=PP+Newsletter\\_bulletin-subscribers&oly\\_enc\\_id=1716A4514089E0P](https://petsplusmag.com/new-coalition-forms-to-tackle-tariff-challenges-in-the-pet-industry/?utm_source=omeda&utm_medium=email&utm_campaign=Newsletter&utm_term=&utm_content=PP+Newsletter_bulletin-subscribers&oly_enc_id=1716A4514089E0P)

<sup>vi</sup> L.E.K. Consulting, NASC Annual Conference, April 22-24, 2025

<sup>vii</sup> Pet Food Institute, Feeding Pets, Fueling the Economy: 600+ Ingredients Drive \$51.7B Pet Food Sales, April 7, 2025, <https://www.petfoodinstitute.org/newsroom/feeding-pets-fueling-the-economy-600-ingredients-drive-51-7b-pet-food-sales-according-to-new-ifeder-report/>

<sup>viii</sup> Source: 2024 Michigan State University, The Economics of the U.S. Pet Supply Industry, \*EMSI contribution included employment, earning, income, national taxes

<sup>ix</sup> American Pet Products Association, Annual Pet Owner Survey

<sup>x</sup> Pet Advocacy Network (PAN), NASC Annual Conference, April 22-24, 2025



Attachment #1:

From United Natural Products Alliance submission to the Docket, which reads in part:

“UNPA greatly appreciates that the Trump Administration recognized the important role of supplements and included over 40 dietary ingredients in Annex II, thus exempting them from most additional tariffs. This was a significant win for keeping Americans healthy. A preliminary analysis of Annex II yields the following ingredients used to produce dietary supplements:

**Vitamins**

- Biotin - HTSUS: 29362950
- Niacin - HTSUS: 29362916
- Vitamin A - HTSUS: 29362100
- Vitamin B1 (thiamine) - HTSUS: 29362200
- Vitamin B2 (riboflavin) - HTSUS: 29362300
- Vitamin B5 - HTSUS: 29362401
- Vitamin B6 - HTSUS: 29362500
- Vitamin B12 - HTSUS: 29362600
- Vitamin C (all forms) - HTSUS: 29362700
- Vitamin D (all forms) - HTSUS: 29362950
- Vitamin E (all forms) - HTSUS: 29362800
- Vitamin K (menadione) - HTSUS: 29362950
- Other Vitamins and their derivatives, nesoi - HTSUS: 29362950
- Vitamins and provitamins (including natural concentrates) and intermixtures - HTSUS: 29369001
- Aromatic or modified aromatic vitamins and their derivatives, nesoi - HTSUS: 29362920

**Minerals**

- Manganese Ascorbate - HTSUS: 25309080
- Selenium - HTSUS: 28049000

**Proteins, Fish Oils, Amino Acids, Probiotics, Flavonoids**

- Folic Acid - HTSUS: 29362910
- Choline - HTSUS: 29231000

- Glutamic Acid - HTSUS: 29224250
- Lysine - HTSUS: 29224100
- EPA (all forms) - HTSUS: 29161930
- Chondroitin (all forms) - HTSUS: 30019001
- DHA (all forms) - HTSUS: 29161930
- MSM (all forms) - HTSUS: 29309092
- Lecithin - HTSUS: 29232020
- L-Glutathione - HTSUS: 29309049
- Creatine - HTSUS: 29252990
- Lactobacillus Acidophilus - HTSUS: 30029052
- N-Acetyl Cysteine - HTSUS: 29309049
- Leucine - HTSUS: 29224980
- L-Tryptophan - HTSUS: 29339912
- L-Theanine - HTSUS: 29241911
- Betaine HCl - HTSUS: 29239001
- Shark Cartilage - HTSUS: 30019001
- L-Glutamine - HTSUS: 29241911
- L-Taurine - HTSUS: 29211961
- Para-aminobenzoic Acid (PABA) - HTSUS: 29224910
- Coenzyme Q10 - HTSUS: 29146200
- Malic Acid - HTSUS: 29181960
- Quercetin - HTSUS: 29329961
- Arabinogalactan - HTSUS: 29400060
- Aromatic amino acid - HTSUS: 29224926

### **Botanicals**

- Stevia Extract - HTSUS: 29389000

Because we know that certain of these ingredients can also be used in the production of some pharmaceutical products, we submit these comments to bring this dual use for the production of very different products to your attention and to be part of the study record. We ask that the

ingredients above from Annex II and other healthful supplements not be inadvertently swept into the 232 investigation and therefore unintentionally be made subject to any forthcoming tariffs that could threaten Americans' ready and affordable access to these critical nutrients. *These ingredients when used in the production of dietary supplements should be excluded from this 232 investigation.*"

<b>HTS Code</b>	<b>Common Name</b>	<b>Exempt from Global and reciprocal tariffs</b>
2936.27.00	Acerola Powder 17% Vitamin C	Yes
	Berberine HCl (from Phellodendron amurense)	
2939.79.00	Extract (bark)	Yes
2922.49.80	Beta Alanine	Yes
2923.90.00	Betaine Anhydrous	Yes
2936.29.10	Biotin Pure	Yes
2804.50.00	Boron (as Boron Citrate)	Yes
2939.30.00	Caffeine Anhydrous	Yes
2914.62.00	Coenzyme Q10	Yes
2925.29.90	Creatine Monohydrate (micronized)	Yes
2936.27.00	Dehydrated Acerola Powder 40% Vitamin C	Yes
2938.90.00	Epimedium Leaf Extract 20%Icariin	Yes
2938.90.00	Fenugreek PE 50%	Yes
2938.90.00	Ginkgo PE 24% Flavonol Glucosides (HPLC)	Yes
2939.79.00	Guarana Extract 12% Caffeine (HPLC)	Yes
2924.19.11	L-Citrulline	Yes
2924.19.11	L-Glutamine	Yes
2924.19.11	L-Theanine	Yes
2922.50.40	L-Tyrosine	Yes
2922.49.80	Magnesium Glycinate	Yes
2918.19.60	Malic Acid	Yes
	Mulberry leaf PE 5% 1-Deoxynojirimycin (HPLC)	
2939.79.00		Yes
2936.29.16	Niacinamide (and Niacin)	Yes
2938.90.00	Panax ginseng Extract (root)	Yes
2914.50.30	Raspberry Ketones	Yes
	Rhodiola Rosea PE 3% Rosavins 2%	
2938.90.00	Salidroside (HPLC)	Yes
2918.16.50	Sodium Gluconate	Yes
2938.10.00	Sophora Japonica 95% Rutin	Yes
2932.14.00	Sucralose	Yes
2921.19.61	Taurine	Yes
2936.26.00	Vitamin B12 (Cyanocobalamin)	Yes
2936.23.00	Vitamin B2	Yes
2936.24.01	Vitamin B5	Yes
2936.25.00	Vitamin B6	Yes
	Berberine HCl (from Phellodendron amurense)	
2939.79.00	Extract (bark)	Yes
2925.29.90	Creatine Monohydrate (micronized)	Yes



391390	Polysaccharides and their derivatives	Yes
2936270000	Vitamin C (Ascorbic acid) and its derivatives	Yes
2936295020	Vitamins D and their derivatives	Yes
	Fatty substances of animal or vegetable origin	
3824994190	and mixtures	Yes
3912310090	Other Cellulose ethers	Yes
29372990	Other Hormones	Yes
2936291630	Niacinamide	Yes
2936295050	Other vitamins and their derivatives	Yes
2936295050	Other vitamins and their derivatives	Yes
2936295050	Other vitamins and their derivatives	Yes
3504	Yeast Extract	No
9602.00.5080	Capsules - Other	No
9602.00.5010	Unfilled Vegetable Capsules	No
3304.99.5000	LOTIONS	No
3917.31.0000	PLASTIC TUBES	No
3923.50.0000	PLASTIC BTLS	No
3917.31.0000	PLASTIC LIDS / CAPS	No
3923.30.0010	PLASTIC BTLS	No
8424.89.9000	SPRAYERS	No
3923.10.9000	PLASTIC BTLS	No
3917.31.0000	PLASTIC LIDS / CAPS	No
4202.92.3131	BAGS	No
6115.96.9020	SOCKS	No
3304.99.5000	LOTIONS	No
4202.91.9090	BAGS	No
2106.90.9987	TEA	No
9602.00.5010	Capsules	No
9602.00.5010	Capsule	No
	OMEGA-3 FISH OIL GUMMY CHEWS 36	
2106.90.9898	CT/PACK	No
	AHCC(R) MUSHROOM MYCELIA EXTRACT	
1302.19.4140	PWD	No
2930.90.9190	PANTETHINE POWDER	No
1302.13.0000	HOPS PE (4:1 CONC.) POWDER BULK	No
	LACTIUM - CASEIN HYDROLYSATE	
3504.00.5000	(PEPTIDES) PWDR BULK	No
	ZEMBRIN SCELETIUM TORTUOSUM EXT.	
1302.19.7000	POWDER BULK	No
	FLORADAPT(tm) INTENSIVE GI (AB-i3.1)	
2106.90.9998	PROBIOTIC BLEND PWD	No
	SACCHAROMYCES BOULARDII YEAST	
2102.10.9090	POWDER (NLT 20 BILLION CFU/G) B.LK	No
	QUERCETIN PHOSPHOLIPID SF/MD	
1302.19.4040	(QUERCEFIT(R)) PWD BULK	No

1302.19.9140	MUCUNA SPP. EXTRACT (15% L-DOPA) POWDER BULK	No
2937.40.9000	PepZinGI(R) POWDER (ZINC-L-CARNOSINE COMPLEX) 10KG	No
1211.90.9290	ORGANIC ELEUTHERO ROOT POWDER 20KG BULK	No
1211.90.9190	FORSLEAN(R) 10% EXTRACT POWDER 25KG	No
2101.20.2090	GREEN TEA 50% EGCG EXTRACT POWDER 25kg	No
2106.90.1050	MACA ROOT RAW ORGANIC POWDER BULK	No
0910.20.0000	SAFFRON (ISO II) POWDER BULK	No
0910.30.0000	CURCUFRESH(TM) STD. FRESH TURMERIC JUICE POWDER BULK	No
3504.00.9000	BIOCELL COLLAGEN(R)-HYDROLYZED TYPE II POWDER BULK	No
0902.10.9015	MATCHA TEA ORGANIC 3 OZ	No
2933.99.0000	L-TRYPTOPHAN GRANULAR PWD w/5% HPMC	No
2922.49.4300	GLYCINE BULK PWD PER DRUM 25KG	No
2930.40.0000	L-METHIONINE BULK PWD	No
2906.13.1000	INOSITOL GRANULAR POWDER BULK	No
3802.90.5000	ACTIVATED CHARCOAL POWDER BULK	No
0506.90.0020	CAL HYDROXYAPATITE BULK PWD	No
0712.90.9002	CITRUS BIOFLAVONOIDS PWD BULK 25 KG	No
3301.29.5150	ORGANIC BLACK CUMIN SEED OIL BULK	No
1515.90.8190	BLACK CURRANT (14% GLA) OIL BULK	No
2916.15.1000	CLA (CONJUGATED LINOLEIC ACID) (NLT 80%) SAFFLOWER OIL BULK	No
1513.19.0000	ORGANIC COCONUT OIL VIRGIN	No
1515.90.8090	ORG. EPO 1000mg CLR VEGGIE SGEL BULK	No
1515.19.0000	ORG. FLAX OIL 1000mg CLR VEGGIE SGEL BULK	No
1515.90.8010	HEMPSEED OIL 1,000MG SOFTGELS BULK	No
1509.20.9030	ORGANIC EXTRA VIRGIN OLIVE OIL LIQ FOR SG/DS	No
3823.70.4000	POLICOSANOL 85% POWDER FROM SUGAR BULK	No
1515.90.2100	MACADAMIA NUT OIL NATURAL BULK	No
1702.90.9000	CORN MALTODEXTRIN POWDER BULK	No
1805.00.0000	DUTCH COCOA PWD 50LB	No

1516.20.9000	ORGANIC (COCONUT) MCT OIL BULK	No
1516.20.9100	MCT OIL- USP/NF BULK	No
2023.20.2050	SUNFLOWER LECITHIN (SOLEC(TM) SF-10) LIQUID BULK (for Softgels)	No
1212.99.9190	BEE POLLEN CHIN PWD BULK low chloramphenicol	No
1302.19.9050	PROPOLIS PWD BULK	No
2102.20.6000	CHLORELLA 1000mg TABS	No
1212.21.0000	*** SPIRULINA 500MG ORGANIC TABS BULK 20m	No
3002.90.5150	*** BLIS-K12(TM) FD PROBIOTIC POWDER (NLT 100 BILLION CFU/G) BULK	No
3507.90.7000	BROMELAIN 2400 GDU/g PWDR 25KG PER DRUM	No
1108.20.0000	ORGANIC INULIN POWDER BULK 25kg	No
1302.19.0200	LIQUID ALOE VERA CONC. BULK	No
3504.00.1000	SOLUGEL(R) ULTRA BD- HYDROLYZED COLLAGEN POWDER BULK	No
2933.49.0090	PQQ POWDER BULK	No
1901.90.9195	ORGANIC RED YEAST RICE POWDER	No
3301.90.5000	GRAPE SEED ANTI PWD BULK 25KG	No
3913.10.0000	SOD ALGINATE BULK PWD	No
0909.62.0000	DANDELION LEAVES POWDER BULK	No
1302.19.4120	AMERICAN GINSENG ROOT 1% GINSENOSES EXTRACT PWD BULK	No
1211.90.8990	PANAX GINSENG ROOT (PURE) POWDER	No
0902.40.0000	ORGANIC BLACK TEA FANNINGS (FINE CUT) BULK	No
0902.20.9015	ORGANIC MATCHA TEA POWDER BULK	No
1211.90.9090	RED RASPBERRY LEAVES POWDER	No
0712.90.6000	PARSLEY SEED POWDER BULK	No
0910.99.2000	*** MARSHMALLOW ROOT POWDER	No
1106.30.4000	ORGANIC ACAI FREEZE-DRIED POWDER	No
0904.20.7300	CAYENNE 45M SHU PWD BULK	No
0910.10.4000	GINGER ROOT BULK POWDER 25KG	No
1301.20.0000	ACACIA GUM ORGANIC POWDER BULK 22.68KG	No
1302.12.0000	LICORICE ROOT BULK PWD 25KG PER BOX	No
3301.10.2000	NAT. NGMO VANILLA (#ING0013371) FLVR,WONF LIQUID	No
3302.10.9000	NAT. PEPPERMINT FLVR (#9517A) WONF PWD NON-GMO BULK	No
9602.00.1040	EMPTY 000 BOVINE CAPS BULK 50M	No

3923.90.0080	VCAPS(R) PLUS '0' BULK MT CAPSULE 100M	No
2006.00.3000	PER BOX	No
0813.10.0000	ORGANIC GINGER SLICES BULK 20KG	No
	NGMO APRICOTS ORGANIC UNSWEET	
	BULK	No
0804.50.8010	MANGO SUGAR SLICES 20KG (FULL CASE)	No
1211.90.8920	PSYLLIUM HUSK BULK POWDER 25 KG	No
1008.90.0140	ORGANIC AMARANTH GRAIN BULK SPEC	
	LBS	No
1108.14.0000	ORGANIC TAPIOCA STARCH POWDER	
	BULK	No
1204.00.0090	ORGANIC BROWN FLAX SEED SPEC BULK	
0813.40.1000	WHOLE 50LB	No
0804.30.6000	PAPAYA SPEARS 20KGS BULK	No
1106.30.0000	PINEAPPLE RINGS BULK 20KGS	No
1302.20.0000	APPLE FIBER BULK 40LBS	No
	APPLE PECTIN BULK PWD 25kg	No
2501.00.1000	PURE OCEAN(R) SEA SALT BULK PWD	
	55lbs	No
1212.92.0000	CAROB (ROASTED) (FM-20) POWDER BULK	
	(for Softgels)	No
1801.00.0000	*** TEMP DROP ORGANIC CACAO NIBS	
1102.90.6000	RAW BULK	No
1302.31.0000	QUINOA INSTANTIZED POWDER BULK	No
	AGAR BULK POWDER 25KG	No
2905.49.4000	ORGANIC ERYTHRITOL FINE POWDER	
1702.30.4085	BULK	No
1702.50.0000	DEXTROSE BULK (25KG/BAG)	No
2905.44.0000	FRUCTOSE BULK	No
	SORBITOL BULK POWDER	No
2905.49.3000	XYLITOL HIGH DENSITY CRYSTALLINE	
2905.43.0000	PWD 25KG	No
0802.92.9000	MANNITOL POWDER	No
0802.99.1500	ORGANIC PINE NUTS	No
0802.62.0000	PECANS BULK 30 LB	No
	RAW MACADAMIA KERNEL BULK	No
2008.19.9010	MACADAMIA KERNEL 4L DRY-	
2008.19.2500	RSTD/SALTED BLK 11.34KG PER BOX	No
1212.99.9200	HONEY ROASTED PECANS BULK	No
2918.14.0000	ORGANIC PUMPKIN SEEDS	No
	CITRIC ACID BULK PWD 22.68KG	No
1206.00.0075	ORGANIC RAW HULLED SUNFLOWER	
0801.32.0000	SEEDS	No
	CASHEWS RSTD & SALT SPEC BULK	No

2918.12.0000	L-TARTARIC ACID FCC POWDER	No
3301.29.5113	CLOVE BUD OIL BULK	No
	ORGANIC BERGAMOT ESSENTIAL OIL	
3301.19.5110	BULK	No
3301.29.1000	ORGANIC EUCALYPTUS OIL 180kg	No
	ORGANIC LEMONGRASS ESSENTIAL OIL	
3301.29.5119	BULK	No
	ORG. GERANIUM BOURBON TYPE ESS. OIL	
3301.29.5116	BULK	No
3301.13.0000	ORGANIC LEMON OIL	No
3301.29.5118	ORGANIC LAVENDER OIL 200KG	No
3301.12.0000	ORGANIC ORANGE OIL 180KG	No
3301.24.0000	ORGANIC PEPPERMINT OIL	No
3301.29.5137	ORGANIC ROSEMARY OIL	No
	CITRONELLA OIL SPEC BULK LIQ	
3301.29.5111	180KGPER DRUM	No
3301.29.4900	SPIKE LAVENDER OIL BULK	No
3301.29.8070	BLUE TANSY ESSENTIAL OIL BULK	No
3301.19.5150	WILD CARROT SEED (INDIA) OIL BULK	No
3301.29.5109	CEDARWOOD ATLAS ESSENTIAL OIL	No
3301.29.5107	CINNAMON (CASSIA) OIL BULK 200KG	No
3301.29.5117	JASMINE ABSOLUTE CHASSIS OIL	No
	LIME OIL SPEC BULK LIQ 181.438KG PER	
3301.19.5120	DRUM	No
3301.29.5129	PATCHOULI OIL SPEC BULK LIQ 200KG	No
1515.90.4000	Organic Rose Hip Seed Oil (Rosa Mosqueta)	No
3301.29.5135	ROSE ABSOLUTE OIL	No
3301.29.5139	SANDALWOOD OIL BULK	No
	SPEARMINT OIL SPEC BULK LIQUID 180 KG	
3301.25.0020	PER DRUM.	No
3301.29.5142	VETIVER OIL BULK	No
3301.29.5143	YLANG YLANG SPEC BULK LIQ 50KG	No
1515.30.0000	ORGANIC CASTOR OIL LIQ	No
1804.00.0000	COCOA BUTTER PURE BULK	No
1515.90.5900	ORGANIC AVOCADO OIL LIQUID	No
2905.45.0000	ORGANIC GLYCERIN VEGETABLE LIQUID	No
1515.90.6000	JOJOBA OIL BULK LIQ DRUM 180KG	No
1515.50.0000	ORGANIC SESAME SEED OIL	No
	LANOLIN PURE (SUPERFINE USP) BULK	
1505.00.1000	PASTE	No
2936.24.0000	PANTHENOL-D BULK LIQ	No
2508.10.0000	EUROPEAN CLAY POWDER BULK 25KG	No
2508.40.4000	RED European CLAY BULK PWD 25KG	No
2916.19.1000	POTASSIUM SORBATE POWDER	No
3823.11.0000	STEARIC ACID BULK POWDER	No

2811.22.5000	SILICON DIOXIDE POWDER 12.5KG	No
	NATURE'S DEODORANT STICK(STONE)	
2833.30.0000	4.25 OZ.	No
2710.19.0000	MINERAL OIL BULK (NON INVENTORY)	No
1702.60.4030	AGAVE LIGHT ORGANIC 23.3 OZ	No
0409.00.0021	MANUKA HONEY MGO 250 8.8 OZ	No
	DECAFFEINATED GREEN TEA POWDER	
0902.20.9050	25KG	No
	AEROSIL(R) 200-F (FUMED SILICA)	
2811.22.0000	POWDER	No
2106.90.9987	Feverfew Herb Powder	No
2907.11.0000	BAKUCHIOL (SYTENOL(R) A) LIQUID BULK	No
	SODIUM OLEFIN (C14-16) SULFONATE	
3402.39.9050	(JEENATE AOS-40) LIQ. BULK	No
	CAL LACTATE GRAN FOR TABS 20KG PER	
2918.11.0000	DRUM	No
0906.20.0000	CINNAMON BARK POWDER	No
	ROYAL JELLY FRZ DRIED PWD BULK 25KG	
0410.00.0000	PER DRUM	No
	MAGNESIUM CITRATE (Fully Reacted)	
2918.15.5000	ANHYD. GRANULAR POWDER BULK	No
1512.19.0025	ORGANIC SUNFLOWER OIL BULK	No
1207.40.0010	ORGANIC SESAME SEEDS HULLED BULK	No
0801.11.0000	ORGANIC COCONUT MEDIUM BULK	No
0806.20.2000	GOLDENBERRIES/INCA ORGANIC BULK	No
	ORGANIC COCONUT MILK 50% POWDER	
2106.90.9980	BULK	No
1008.50.0010	ORGANIC WHITE QUINOA GRAIN BULK	No
1106.30.9000	ORGANIC COCONUT FLOUR BULK	No
2923.90.00	Acetyl L Carnitine HCL	No
	Ashwagandha (Withania somnifera) Powder	
1302.19.90	(root)	No
	Bacopa (Bacopa monnieri) Extract (whole	
1302.19.90	plant) (std. to 50% bacosides)	No
1302.19.91	Beet Powder (Beta vulgaris L)(root)	No
2106.90.99	Bitter Orange Fruit Extract (Citrus Aurantium)	No
1106.20.10	Black Maca (Lepidium meyenii) Extract (root)	No
3507.90.70	Bromelain (Ananas comosus)	No
2106.10.00	Brown Rice Protein Concentrate	No
2933.99.95	Chromax Chromium picolinate	No
2918.14.00	Citric Acid	No
2106.90.99	Conjugated Linoleic Acid	No
2922.49.40	D-Aspartic Acid	No
2835.25.00	Dicalcium Phosphate	No

1108.20.00	Fructooligosaccharides (FOS) (from inulin)	No
2106.90.99	Garcinia Camboga Fruit Extract	No
1302.19.90	Grape (Vitis vinifera) Extract (seed)	No
1302.19.90	Grapefruit Seed Extract	No
2101.11.29	Green Coffee Bean Extract	No
1302.19.91	Guggul Extract	No
1302.19.91	huperzia Serrata	No
	Inulin (from Blue Agave (Tequilana weber)	
1108.20.00	(plant))	No
1108.20.00	Inulin Fiber	No
2918.15.50	Magnesium (as Magnesium Citrate)	No
1302.19.91	Mangifera Indica Seed Extract	No
1302.19.91	Olive Leaf Extract	No
1302.19.9040	Turmeric Extract	No
2923.90.0000	Betaine Nitrate	No
1302.19.9040	Beet Root Extract	No
2918.19.9090	Magnesium L-Threonate	No
1302.19.9040	Black Pepper Fruit Extract	No
1212.21.0000	Irish Moss (Chondrus crispus) Powder (whole plant)	No
1302.19.9040	Cinnamon (Cinnamomum cassia) Extract (bark)	No
2922.49.4050	L-Arginine HCl	No
1302.19.9040	Yellow Maca (Lepidium meyenii) Extract (root)	No
2936.27.0000	Vitamin C (as Ascorbic Acid)	No
2933.99.7900	DIM (diindolylmethane)	No
3913.90.5000	Hyaluronic Acid	No
2930.90.2900	N-Acetyl-Cysteine	No
2835.24.0000	Potassium (as dipotassium phosphate)	No
1302.19.9040	Horny Goat Weed (Epimedium sagittatum)	
	Extract (aerial parts)	No
2922.49.4050	Arginine Nitrate (as NO <sub>3</sub> -T®)	No
1302.19.9040	Saw Palmetto (Serenoa repens) Extract (fruit)	
	(min. 45% fatty acids)	No
2936.29.5020	NMN (β-Nicotinamide Mononucleotide)	No
0910.30.0000	Turmeric (Curcuma longa) Extract (root or rhizomes)	No
1214.90.0080	Organic Wheatgrass (Triticum aestivum)	
	Powder (leaf)	No
2936.26.0000	Vitamin B12 (as Methylcobalamin)	No
1302.19.9040	Green Tea (Camellia sinensis) Extract (leaf)	
	(std. for 50% EGCG)	No
1302.19.9040	Goji Berry (Lycium barbarum) Extract (fruit)	No

0712.39.0000	Lion's Mane ( <i>Hericium erinaceus</i> ) Powder (fruiting body)	No
2918.29.2000	Zinc (as Zinc citrate)	No
1302.19.9040	Tart Cherry ( <i>Prunus cerasus</i> ) Extract (fruit)	No
0712.39.0000	Royal Sun ( <i>Agaricus blazei</i> ) Powder (whole mushroom)	No
2840.20.0000	Boron (as Boron Amino Acid Chelate)	No
0910.30.0000	Turmeric ( <i>Curcuma longa</i> ) Powder (root)	No
2209.00.0000	Organic Apple Cider Vinegar Powder (acetic acid 5% the mother)	No
0712.39.0000	King Trumpet ( <i>Pleurotus eryngii</i> ) Powder (whole mushroom)	No
2936.26.0000	Vitamin B6 (as Pyridoxine HCl)	No
1302.19.9040	Longjack ( <i>Eurycoma longifolia</i> ) Extract (root)	No
1302.19.9040	Green Tea Leaf Extract (min. 45% EGCG)	No
2939.30.0000	Caffeine Anhydrous	No
2931.90.9043	Selenium (as L-Selenomethionine)	No
1302.19.9040	Green Tea ( <i>Camellia sinensis</i> ) Leaf Extract (50% caffeine)	No
0712.39.0000	Cordyceps Mushroom ( <i>Cordyceps militaris</i> ) Powder (mycelia) (std. to beta glucans)	No
0712.39.0000	Chaga Mushroom ( <i>Inonotus obliquus</i> ) Powder (fruiting body or mycelia)	No
1302.19.9040	Tribulus terrestris Extract (fruit)	No
2923.20.0000	L-Carnitine Tartrate	No
1302.19.9040	Saffron ( <i>Crocus sativus</i> ) Extract (flower)	No
0712.39.0000	Turkey Tail ( <i>Trametes versicolor</i> ) Powder (whole mushroom)	No
0712.39.0000	Cordyceps ( <i>Cordyceps sinensis</i> ) Extract (mycelium)	No
2817.00.0000	Zinc (as Zinc Oxide)	No
0712.39.0000	Shiitake ( <i>Lentinula edodes</i> ) Powder (whole mushroom)	No
0712.39.0000	Maitake ( <i>Grifola frondosa</i> ) Powder (fruiting body)	No
0712.39.0000	Reishi Mushroom ( <i>Ganoderma lucidum</i> ) Powder (fruiting body or mycelia)	No
0404.90.1000	Skim Colostrum Powder	No
2921.19.6090	Taurine	No
1302.19.9040	Yohimbe Bark ( <i>Pausinystalia yohimbe</i> ) Extract (bark)	No
1302.19.9040	Ginger ( <i>Zingiber officinale</i> ) Extract (root)	No
1214.90.0080	Wheatgrass ( <i>Triticum aestivum</i> ) Powder (aerial parts)	No
2936.27.0000	Vitamin D3 (as cholecalciferol)	No



1702.90.4000	D-mannose	No
1302.19.9040	Garlic ( <i>Allium sativum</i> ) Extract (bulb)	No
1302.19.9040	Horny Goat Weed ( <i>Epimedium grandiflorum</i> ) Extract (aerial parts)	No
2827.20.0000	Potassium Chloride	No
2936.28.0000	Vitamin E (as d-Alpha-Tocopheryl Acetate)	No
1302.19.9040	Valerian ( <i>Valeriana officinalis</i> ) Extract (root)	No
0712.39.0000	Shiitake Mushroom ( <i>Lentinula edodes</i> ) Extract (fruiting body or mycelia)	No
1302.19.9040	Stinging Nettle ( <i>Urtica dioica</i> ) Extract (aerial parts)	No
1214.90.0080	Barleygrass ( <i>Hordeum vulgare</i> ) Powder (aerial parts)	No
1302.19.9040	Toothed Clubmoss ( <i>Huperzia serrata</i> ) Extract (whole plant)(std. for huperzine A)	No
1302.19.9040	VegiSurge Green Tea Extract std to 98% Caffeine	No
2917.19.5000	Iron (as Ferrous Fumerate)	No
2101.12.9000	Coffee ( <i>Coffea arabica</i> ) Extract (std. to 98% caffeine) (bean)	No
2101.12.9000	Green Coffee ( <i>Coffea robusta</i> ) Extract (bean)	No
2101.20.9000	Yerba Mate ( <i>Ilex paraguariensis</i> ) Extract (leaf)(8% caffeine)	No
1302.19.9040	White Willow ( <i>Salix alba</i> )Extract (std. for 50% Salicin) (bark)	No
1302.19.9040	Boswellia ( <i>Boswellia serrata</i> ) Extract (gum resin) (std. to 65% Boswellic Acids)	No
1302.19.9040	Grains of Paradise Extract	No
2501.00.0050	Sodium (as Himalayan Pink Salt)	No
2936.10.0000	Vitamin A (as Retinyl Palmitate)	No
1302.19.9040	Ginger ( <i>Zingiber officinale</i> ) Extract (root or rhizomes)	No
1302.19.9040	Green Tea ( <i>Camellia sinensis</i> ) Extract (std. to 98% caffeine) (leaf)	No
1302.19.9040	Giant Knotweed ( <i>Polygonum cuspidatum</i> ) Extract (std. for trans-resveratrol) (root)	No
1302.19.9040	Guarana ( <i>Guarana cupana</i> ) Extract (seeds)	No
2936.29.5050	Inositol	No
1302.19.9040	Long Pepper Extract ( <i>Piper longum</i> )(fruit and leaf)	No
1008.50.0000	Quinoa ( <i>Chenopodium quinoa</i> ) Powder (whole grain)	No
2936.27.0000	Vitamin D (as Cholecalciferol)	No
0712.39.0000	Reishi Mushroom ( <i>Ganoderma lucidum</i> ) Powder (fruiting body)	No

0712.39.0000	Cordyceps Mushroom ( <i>Cordyceps sinensis</i> ) Powder (mycelium)	No
1302.19.9040	Turmeric ( <i>Curcuma longa</i> L.) Extract (root)	No
0904.20.6000	Cayenne Pepper ( <i>Capsicum annuum</i> ) Powder (fruit and seeds)	No
0712.39.0000	Maitake ( <i>Grifola frondosa</i> ) Powder (whole mushroom)	No
1302.19.9040	Tribulus terrestris Extract (fruit) (std. to 90% saponins)	No
1211.90.9090	Dandelion ( <i>Taraxacum mongolicum</i> ) Powder (root)	No
1302.19.9040	Green Tea ( <i>Camellia sinensis</i> ) Extract (leaf) (std. to caffeine)	No
1302.19.90	Botanical Extracts	No
1302.19.90	Botanical Extracts	No
1302.19.90	Botanical Extracts	No
3507.9	Dietary Enzymes	No
3507.9	Dietary Enzymes	No
3923.3	Empty HDPE Bottle	No
7010.9	Empty Glass Bottle	No
1517.90.4085	Fish Oils	No
1504.10.20	Cod Liver Oil	No
0305.79.0000	Shark Cartilage	No
2106.90.99	Bitter Orange Fruit Extract ( <i>Citrus Aurantium</i> )	No
1302.19.90	Grapefruit Seed Extract	No
1302.19.91	Guggul Extract	No
	huperzia Serrata	No
0712.90.6500	Organic Parsley	No
1212.99.9200	Organic Karob	No
1301.90.9190	Chios Gum	No
1301.90.9190	Resin	No
1302.19.4140	Ginger	No
1302.19.4140	Guggul Extract	No
1302.19.4140	Lemon	No
1302.19.4140	Orange	No
1302.19.4140	Grapefruit	No
1302.19.4140	Rhodiola	No
1302.19.4140	Perilla Seed	No
1302.19.4140	Pomegranate	No
1302.19.4140	Rhaponticum	No
1302.19.4140	Undaria	No
1302.19.4140	Grains of Paradise	No
1302.19.4140	Sceletium Tortuosum	No
1302.19.4140	Mango	No
1302.19.9140	Boswellia	No

1302.19.9140	Rosemary Extract	No
1302.19.9140	Wheat Extract	No
1302.19.9140	Haldi	No
1302.19.9140	Elderberry	No
1302.19.9140	Olive Fruit	No
1302.19.9140	Millet Seed	No
1302.19.9140	Mulaga	No
1302.19.9140	Curry Leaf	No
1302.19.9140	Black Pepper	No
1302.19.9140	Saffron	No
1302.19.9140	Brown Seaweed	No
2106.90.9998	K2	No
2106.90.9998	Propolis	No
2936.29.2000	K2	No
3504.00.5000	Fish Collagen	No
3913.10.0000	Alginic Acid	No
9903.88.6900	Alginate	No
3503005510	Edible gelatin	No
3503005510	Edible gelatin	No
2847000000	Hydrogen peroxide	No
	Essential oils, including concretes and	
3301	absolutes	No
130219	Vegetable saps and extracts	No
130219	Vegetable saps and extracts	No
130219	Vegetable saps and extracts	No
842230	Machinery	No
2106909998	Food preparations not elsewhere specified	No
2309909500	Mixed feeds or mixed feed ingredients	No
2923100000	Choline and salts	No
2101202090	Extracts, essences and concentrates, of tea	No
28211000	Iron Oxide	No
9602001040	Unfilled gelatin capsules	No
	Essential oils, including concretes and	
3301	absolutes	No
	Parts of Machinery, plant or laboratory	
841990	equipment	No
842230	Machinery for filling, closing, sealing	No
842290	Parts of Machinery for filling, closing, sealing	No
	Animal, vegetable or microbial fats and oils and	
1516209100	their fractions	No
2106909998	Food preparations not elsewhere specified	No
2309901050	Mixed feeds or mixed feed ingredients	No
2309909500	Mixed feeds or mixed feed ingredients	No
3503005510	Edible gelatin	No

3402399050	Anionic organic surface-active agents	No
3923900080	Articles for the conveyance or packing of goods	No
3923900080	Articles for the conveyance or packing of goods	No
3923900080	Articles for the conveyance or packing of goods	No
3923900080	Articles for the conveyance or packing of goods	No
3503005510	Edible gelatin	No
130219	Vegetable saps and extracts	No
2106909998	Food preparations not elsewhere specified	No
3802100020	Activated carbon derived from coconut	No
1302.19.41.40	Fenugreek Seed Extract	No
1302.19.41.40	Proprietary Blend of Pomegranate and Cacao Extracts	No
1302.19.41.40	Saffron Extract	No
1302.19.41.40	Caralluma Fimbriata Extract	No
1302.19.41.40	Shilajit Extract	No
1302.19.41.40	Red Clover Extract	No
1302.19.41.40	Damiana Extract	No
1302.19.41.40	Ginkgo Biloba Extract	No
1302.19.41.40	Proprietary Blend of Asparagus Racemosus, Commiphora Mukul, Tinospora Cordifolia, and Withania Somnifera Extracts	No
1302.19.41.40	Aged Black Garlic Extract	No
1302.19.41.40	Ageratum Conyzoides Extract	No
1302.19.41.40	Gynostemma Pentaphyllum Extract	No
1302.19.41.40	Proprietary Blend of Terminalia Chebula and Sphaeranthus Indicus Extracts	No
2106.90.99.98	Patented Technology Excipient Blend	No
2106.90.99.98	Palmitic Acid Monoethanolamide + Patented Technology Excipient Blend	No
2106.90.99.98	Turmeric Extract (Curcuma Longa Extract) + Patented Technology Excipient Blend	No
2106.90.99.98	Trans-Resveratrol + Patented Technology Excipient Blend	No
2106.90.99.98	Quercetin Extract + Patented Technology Excipient Blend	No
2106.90.99.98	Algal DHA + Proprietary Technology Excipient Blend	No
2915.70.01.50	Palmitic Acid Monoethanolamide	No
2106.90.99.98	Astaxanthin Extract + Proprietary Technology Excipient Blend	No
3301.90.1050	VANILLA PLANIFOLIA SOLID EXTRACT	No

2921.20.6000	TAURINE (0.5% ANTI-CAKING) FINE PWD BULK	No
2836.50.0000	CAL CARB PURE POWDER BULK 25KG	No
1509.10.2000	OLIVE OIL XTRA VIRG BULK LIQ DRUM	No
1514.19.0000	CANOLA OIL BULK (for Softgels)	No
0305.59.0001	SHARK CART CAN BKBONE PWD	No
0801.22.0000	RAW BRAZIL NUTS	No
1902.19.2090	QUINOA MACARONI ELBOWS PASTA GF ORG 8 OZ	No
3302.90.1010	SATSUMA ORANGE-GRAPEFRUIT FRAGRANCE (AF151837)	No
1515.90.8010	Hemp Seed Oil	
1515.19.0000	Flax Oil	