



May 7, 2025

Office of Strategic Industries and Economic Security
Bureau of Industry and Security
U.S. Department of Commerce
1401 Constitution Ave. NW
Washington D.C. 20230

Re: DOCKET BIS-2025-0022, REGULATIONS.GOV ID Number XRIN 0694-XC120

To Whom It May Concern:

The Corn Refiners Association (CRA) welcomes this opportunity to provide input into the investigation to determine the effects on the national security of imports of pharmaceuticals and pharmaceutical ingredients under Section 232 of the Trade Expansion Act of 1962, as amended. CRA appreciates the Trump Administration's efforts to work closely with U.S. stakeholders on changes to U.S. trade policies.

CRA is a 110-year-old association that represents the entire U.S. corn refining industry. CRA represents everything made from corn, except ethanol fuel. Our \$20 billion industry excels at innovation and efficiency, making hundreds of refined corn products with thousands of uses, including personal care products, food, and medication. We celebrate the advancement our members have made in turning corn into functional ingredients and feedstock for many bio-based products. Corn refiners employ over 9,700 people in the United States, with over \$1.5 billion in wages, often accounting for the highest-paying jobs in rural areas within the Corn Belt. As such, CRA supports U.S. policies that help restore domestic agricultural manufacturing.

CRA tracks about 40 refined corn products that are traded globally. Of these products, eleven were included in USTR's Annex II exclusion list in the April 2 announcement of reciprocal tariffs. Please see the attached list. The products include inputs used in making chemicals, solvents, and plastics; a biodegradable polymer; amino acids that are a critical element in animal feed; and a low-calorie sweetener. Please consider that many of the refined corn products on this list have uses other than in pharmaceutical products. In many cases, uses in pharmaceutical products are only a small fraction of overall use.

CRA recognizes each of these products has a unique global supply and demand situation, and we request more in-depth analysis into each of these products. For any policy response to be effective, we

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believe the Administration will need a clear understanding of global production and consumption, including in the United States, and factors affecting manufacturing competitiveness. The Administration's actions related to this investigation should take into consideration what can currently be sourced domestically. Without domestic production or the right conditions to incentivize domestic production, tariffs may merely add unnecessary cost to U.S. patients.

In some cases, U.S. manufacturers of these products have been limited by competition from China, where markets have been manipulated and distorted by subsidies and other government interference. These issues have been documented in U.S. and EU antidumping and countervailing duty cases and in information shared with the Administration by CRA. CRA requests special consideration of how China's non-market practices have affected global conditions for these products, recognizing that the nuances will be different for each product within this list.

In summary, we appreciate the Administration's efforts to address some important challenges related to pharmaceuticals and pharmaceutical products. However, we are concerned about unintended consequences our industry and U.S. consumers might face if the policy response does not carefully take into consideration the issues mentioned above. We are eager to work more closely with the Administration on developing policies to support U.S. production of refined corn products and welcome any additional opportunities for input (e.g., hearings).

Sincerely,

John Bode
President & CEO
Corn Refiners Association

ATT: Refined Corn Products Included on Annex II Exclusion List



CRA
CORN REFINERS
ASSOCIATION

Refined Corn Products Included on Annex II Exclusion List	
HTSUS	Description
29181151	Salts and esters of lactic acid
29181350	Salts and esters of tartaric acid, nesoi
29181650	Salts and esters of gluconic acid
29224100	Lysine and its esters and salts thereof
29224250	Glutamic acid and its salts, other than monosodium glutamate
29225050	Nonaromatic amino-alcohol-phenols, amino-acid-phenols and other aminocompounds with oxygen function
29322050	Nonaromatic lactones
29400060	Other sugars, nesoi excluding d-arabinose
38249955	Mixtures of halogenated hydrocarbons, nesoi
38249993	Chemical products and preparations and residual products of the chemical or allied industries, nesoi
39077000	Poly(lactic acid)