



May 5, 2025

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Docket No. 250414-0065

BIS- 2025-0022

XRIN 0694- XC120

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)

Dear Secretary Lutnick:

The United Natural Products Alliance (UNPA) appreciates the opportunity to provide comments related to the Department's *National Security Investigation of Imports of Pharmaceuticals and Pharmaceutical Ingredients*. UNPA is a leading trade association comprised of approximately 100 companies dedicated to advancing global natural health products. Embracing a dedication to quality, science, and innovation, UNPA collaborates closely with industry leaders, government agencies, and stakeholders to champion responsible business practices. It advocates for standards that ensure consumer safety, access to reliable health information, and well-trained health practitioners. UNPA, together with its members and partners, nurtures industry excellence and leadership. This collective effort propels growth and upholds integrity within the natural health products community. UNPA serves as a unifying voice driving forward scientific advancements and safeguarding the health freedom of consumers.

It is essential for our nation's health and well-being to maintain a ready and affordable supply of critical nutrients. Over 170 million Americans depend on critical nutrients and other dietary

supplements as part of their efforts to improve their nutrition and stay healthy, including over 70 percent of Americans 60 and over. For example:

- Women of childbearing age count on folic acid supplements for healthy pregnancies. Numerous studies have shown that pre-pregnancy use of prenatal vitamins containing folic acid can prevent 50 to 70 percent of neural tube defects.
- Parents count on the vitamin D, choline and other vitamins and minerals in infant formula to nourish their babies. Well over half of all babies under the age of 3 months are consumers of infant formula. These key nutrients are required to be included in all baby formula marketed in the United States, yet some of these ingredients cannot be sourced domestically.
- Older Americans especially count on supplements including calcium, vitamin D and vitamin B12 supplements as the body's needs and functions change as we age.

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.*

We greatly appreciate the Trump Administration's focus on Making America Healthy Again and recognition of the key role that critical vitamins and other nutrients play in helping Americans maintain and improve their health. UNPA stands ready to provide any additional information or clarifications the Department finds necessary as it undertakes this study.

Cordially,

A handwritten signature in black ink, appearing to read 'Loren Israelsen', with a stylized, flowing script.

Loren Israelsen
President & Founder
United Natural Products Alliance

/hhc