



May 6, 2025

The Honorable Howard Lutnick
Secretary of Commerce
U.S. Department of Commerce
1401 Constitution Ave, NW
Washington, DC 20230

Via: regulations.gov

Re: Department of Commerce Bureau of Industry and Security Docket No. 250414-0065 Notice of Request for Public Comments on Section 232 National Security Investigation of Imports of Pharmaceuticals and Pharmaceutical Ingredients [XRIN 0694-XC120]

Dear Secretary Lutnick,

The American Feed Industry Association (AFIA) congratulates you on your confirmation as the 41st U.S. secretary of Commerce and looks forward to working with you and the Trump administration as it works to hold current trade partners accountable, uphold science-based standards and open new doors for American manufacturers. The AFIA appreciates the opportunity to comment on Department of Commerce Bureau of Industry and Security *Notice of Request for Public Comments on Section 232 National Security Investigation of Imports of Pharmaceuticals and Pharmaceutical Ingredients* (XRIN 0694-XC120). We will highlight an area where we see the investigation on pharmaceuticals, specifically on pharmaceutical ingredients, potentially disrupting the U.S. food and feed supply chain.

Founded in 1909, the AFIA, based in Arlington, Va., is the world's largest organization devoted exclusively to representing the business, legislative and regulatory interests of the U.S. animal food industry and its suppliers. The organization's membership is comprised of over 650 domestic and international companies that represent the total feed industry—manufacturers of commercial and integrated feed and pet food, ingredient suppliers, pharmaceutical companies, industry support and equipment manufacturers. AFIA's members manufacture more than 75% of the feed and 70% of the non-whole grain ingredients used in the country. The AFIA is also recognized as the leader on international industry developments and holds membership in the International Feed Industry Federation (IFIF).

The AFIA and its members provide innovative and high-quality ingredients, feed and pet food that provide quality animal nutrition for domestic livestock, poultry, fish and pets in the United States, promoting animal health and food security. However, animal production, human health and food security are at risk due to the United States' current dependence on China for vitamins and other ingredients such as amino acids. Vitamins not only play a vital role in everyday human health and animal health and production but are also utilized as ingredients in pharmaceutical-based products.

Our Industry. Our Passion. Our Voice.

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The United States is dependent on China for vitamin imports—standing at a staggering 94% for vitamin B6 and over 91% for vitamin C, and **over 78% for all vitamins**—which speaks volumes about potential vulnerabilities in our supply chain. This heavy dependence not only raises questions about supply chain vulnerabilities but also emphasizes the influence that China has on the health and well-being of Americans and American animal food and food security. **The AFIA supports policies that encourage companies’ and manufacturers’ efforts to reclaim vitamin production and would encourage the administration to incentivize investment in U.S. production.** Several vitamins critical to animal health are also critical in the production of pharmaceuticals and although tariffs are a tactic that the administration could use, we fear that steep tariffs on vitamin imports will drastically derail food and feed security efforts in the United States.

An example of several vitamins critical to the animal food sector and pharmaceuticals are below.

Vitamin	Functional/Formulation Use in Pharmaceuticals	Function in Animal Food	HTS	Currently Exempt from Tariffs?
Vitamin D3 (Cholecalciferol)	Can be used in formulation	Promotes the growth and development of livestock, particularly in young animals	29362900	No
Vitamin B12 (Cyanocobalamin)	Can be used in formulation	Will cause metabolic disorders, nervous system problems if lacking in animal nutrition	29362600	No
Folic Acid (Vitamin B9)	Common with methotrexate	Involved in various metabolic processes, including energy production, protein synthesis and nervous system function.	29362910	No
Niacin (Vitamin B3)	Sometimes used in topical formulations	Involved in various metabolic processes, including energy production, protein synthesis and nervous system function.	29362916	No
Vitamin C (Ascorbic Acid)	Antioxidant, stabilizer in injectables	Supports the immune system	29362700	Annex II
Vitamin E (Tocopherol)	Lipid antioxidant in soft gels	An antioxidant vitamin that helps protect cell membranes from damage and supports immune function. It is particularly important for the health of muscle tissues and reproductive performance.	29362800	Annex II
Niacinamide (B3 form)	Skin formulations, stabilizer	Involved in various metabolic processes, including energy production, protein synthesis and nervous system function.	29362916	Annex II
Thiamine (Vitamin B1)	Cell culture media (biotech)	Involved in various metabolic processes, including energy production, protein synthesis, and nervous system function.	29363300	Annex II
Riboflavin (Vitamin B2)	Cell culture media (biotech)	Involved in various metabolic processes, including energy production, protein synthesis, and nervous system function.	29362300	Annex II

While this table is not inclusive of all possible vitamins, it provides a tangible example how the investigation could affect the health and well-being of dairy- and protein-producing animals in the United States and the impact our food system could face, should the administration implement tariffs as the only remedy. Food-producing animals require diets formulated to ensure animal health and productivity while maintaining safe and affordable food. **Recognizing the important role that vitamins play in our food and national security the AFIA would welcome further discussion with the administration on how vitamin production could return to the United States and how we can support diversification of this supply chain.**

The AFIA thanks the Department of Commerce for the time and attention given to this issue and for understanding the relationship between food security and national security. Should the agency have any questions, do not hesitate to reach out to Mallory Gaines, AFIA's director of global affairs, at mgaines@afia.org. We look forward to the department's review of our comments and the plan to address threats to U.S. production, growth and economic resilience.

Sincerely,

A handwritten signature in cursive script that reads "Constance Cullman".

Constance Cullman
President & CEO