



May 7, 2025

**Filed Electronically at [www.regulations.gov](http://www.regulations.gov)**

**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: Artemis International Comments on Section 232, the Department of Commerce's  
National Security Investigation of Imports of Pharmaceuticals and Pharmaceutical  
Ingredients (XRIN 0694-XC120)**

Dear Secretary Lutnick:

Artemis International appreciates the opportunity to submit comments regarding the Department's ongoing national security investigation into the importation of pharmaceuticals and pharmaceutical ingredients. As a leading supplier of high-quality ingredients for the dietary supplement market, Artemis is committed to advancing global access to natural health products. Our mission is grounded in science, quality, and innovation, and we work closely with industry partners and stakeholders to support the production of safe, effective dietary supplements that contribute to public health and well-being.

Access to a reliable and affordable supply of essential nutrients is vital to the health of the American public. More than 170 million Americans rely on dietary supplements to support their nutritional needs and overall wellness—including over 70 percent of adults aged 60 and older. These supplements play a critical role across all life stages. For example:

- **Women of childbearing age** rely on folic acid supplements to support healthy pregnancies. Research shows that prenatal vitamins containing folic acid, taken before conception, can prevent 50 to 70 percent of neural tube defects.

- Artemis strongly supports the Administration's recognition of the importance of dietary supplements, as evidenced by the inclusion of over 40 critical dietary ingredients in **Annex II**, exempting them from most additional tariffs. This action represents a significant step in ensuring continued access to essential nutrients for millions of Americans.

01. 2007. 09. 06. 10:00:00

- 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 derivatives, nesoi (HTSUS: 29362950)
- Vitamin/provitamin concentrates & intermixtures (HTSUS: 29369001)
- Aromatic or modified aromatic vitamins (HTSUS: 29362920)

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

## **Proteins, Amino Acids, Oils, Probiotics, and Other Nutrients**

- 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 Acids (HTSUS: 29224926)

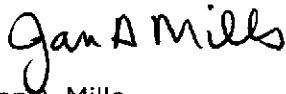
## **Botanicals**

- Stevia Extract (HTSUS: 29389000)

We understand that some of these ingredients may also be used in pharmaceutical manufacturing. Therefore, we respectfully urge the Department to recognize the distinct role these ingredients play in the production of dietary supplements and to ensure they are not inadvertently subjected to additional tariffs under the Section 232 investigation. Inclusion of these ingredients in future trade restrictions could severely disrupt Americans' access to safe, affordable nutritional products.

We commend the Administration's commitment to safeguarding the health of Americans and recognizing the vital role that supplements and functional ingredients play in supporting well-being. Artemis International remains ready to support the Department's investigation and provide further insights as needed.

Sincerely,

A handwritten signature in black ink that reads "Jan A Mills". The signature is written in a cursive, flowing style.

Jan A. Mills  
CEO & Founder  
Artemis International, Inc.