

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:

Thank you for the opportunity for Sonoran University of Health Sciences to comment on the Department's *National Security Investigation of Imports of Pharmaceuticals and Pharmaceutical Ingredients*. As President of a health sciences university that emphasizes lifestyle's role – particularly nutrition – in maintaining health, I am concerned that the ingredients below from Annex II and other healthful supplements could be inadvertently included in the Section 232 investigation. Doing so would unintentionally jeopardize American's access to critical nutrients due to forthcoming tariffs. *I respectfully request that these ingredients when used in the production of dietary supplements should be excluded from this 232 investigation.*

The Trump Administration took an important step in safeguarding Americans' health by recognizing the important role of supplements and included over 40 dietary ingredients in Annex II, thus exempting them from most additional tariffs. 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

Thank you and the Trump Administration's focus on Making America Healthy Again. Please don't hesitate to reach out for additional information as the study moves forward.

Yours in health,



Paul Mittman, ND, EdD
President & CEO
Sonoran University of Health Sciences