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Bureau of Industry and Security

Office of Strategic Industries and Economic Security

U.S. Department of Commerce

PCPC Comments on Section 232 Investigation of Imports of Pharmaceuticals and Pharmaceutical Ingredients (Docket XRIN 0694-XC120)

The Personal Care Products Council (“PCPC”) and its members are pleased to submit comments in response to the U.S. Department of Commerce’s Section 232 Investigation of Imports of Pharmaceuticals and Pharmaceutical Ingredients.¹

PCPC is the leading national trade association representing the global cosmetic and personal care products industry. Founded in 1894, PCPC now includes approximately 600 member companies that manufacture, distribute, and supply the vast majority of finished cosmetic and personal care products marketed in the United States. As the makers of a diverse range of products that millions of consumers rely on and trust every day – from sunscreens, toothpaste, and shampoo to moisturizer, lipstick, and fragrance – U.S. cosmetics and personal care products companies are global leaders committed to product safety, quality, and innovation. On average, individuals use between 6 to 12 personal care products each day and consider these products as essential to their well-being, hygiene and beauty routines.

The U.S. cosmetics and personal care products industry is one of the most dynamic and innovative industries driving the U.S. economy. According to a 2024 study conducted by PricewaterhouseCoopers (PwC)², our industry contributed over \$308 billion to our nation’s GDP, and over \$82 billion in federal, state and local tax payments. With \$68 billion in U.S. manufacturing and over 4.6 million U.S. jobs, our industry’s competitiveness is vital to our country’s overall economic competitiveness.

Domestic personal care products manufacturing provides the majority of the products for the U.S. market. Access to global markets is critical to our industry’s success, and over the past thirty years, the U.S. cosmetics and personal care products industry typically achieved a trade surplus.

Products represented by PCPC member companies include those that provide consumers with essential hygiene and skin protection, such as sunscreens, anti-cavity toothpaste, anti-dandruff shampoo and antiperspirants. Certain ingredients in such products, for example, surfactants, certain colors, and "mixtures of chemicals" share HTS numbers with pharmaceutical

¹ [Federal Register :: Notice of Request for Public Comments on Section 232 National Security Investigation of Imports of Pharmaceuticals and Pharmaceutical Ingredients](#)

² PwC [“The Beauty of Impact: Economic & Social Contributions Report 2024”](#)

ingredients that have been exempt from reciprocal tariffs in the Annex II ³. Higher tariffs on these ingredients would be a significant negative impact on U.S. manufacturing of these essential daily use products and on U.S. consumers. We urge the Administration to maintain this critical exemption for these ingredients. Please refer to the annex below for a sampling of HTS codes that could be affected.

PCPC appreciates the opportunity to provide information and perspectives for consideration during the Secretary of Commerce's investigation concerning the national security implications of imports of pharmaceuticals and pharmaceutical ingredients, as well as their derivative products. We would be pleased to offer further information and clarification on any of the points raised. We look forward to additional opportunities to discuss the impact of U.S. policies on our industry and to support initiatives that enhance and create new global market opportunities for our member companies.

Sincerely,



Francine Lamoriello
 Executive Vice President Global Strategies

Annex: Sampling Of Cosmetic Raw Materials Impacted by Section 232 Pharmaceutical Investigation

HTS Code	Article Description
38249929	Mixtures containing 5% or more by weight of one or more aromatic or modified aromatic substance, nesoi
38249993	Chemical products and preparations and residual products of the chemical or allied industries, nesoi
34024210	Non-ionic organic surface-active agents, aromatic or modified aromatic
34024220	Fatty substances of animal, vegetable or microbial origin; non-ionic organic surface active agents, other than aromatic or modified aromatic

³ [Federal Register :: Regulating Imports With a Reciprocal Tariff To Rectify Trade Practices That Contribute to Large and Persistent Annual United States Goods Trade Deficits](#)

34024290	Non-ionic organic surface-active agents, other than fatty substances of animal, vegetable or microbial origin, other than aromatic / modified aromatic
32030080	Coloring matter of vegetable or animal origin, nesoi
32041380	Basic dyes and preparations based thereon, nesoi
32041720	Copper phthalocyanine ([Phthalocyanato(2-)]copper) not ready for use as a pigment
32061100	Pigments & preparations based on titanium dioxide containing 80 percent or more by weight off titanium dioxide calculated on the dry weight
32061900	Pigments and preparations based on titanium dioxide, nesoi
32041800	Carotenoid coloring matters and preparations based thereon