



May 6, 2025

The Honorable Howard Lutnick

Secretary

U.S. Department of Commerce

1401 Constitution Ave NW

Washington, DC 20230

Dear Secretary Lutnick,

Arbonne International, LLC applauds the Department of Commerce's recent exemptions of key ingredients, such as vitamins A, C, and CoQ10, from the April 5, 2025, global and country-specific tariffs. We are committed to partnering with you to strengthen domestic manufacturing while ensuring affordable access to supplements critical to Making America Healthy Again (MAHA). To this end, we urge the continued and expanded exemption of dietary supplement ingredients from Section 232 tariffs.

Americans are overfed but undernourished. Considering that more than half the calories Americans consume come from nutrient-depleted, ultra-processed foods, including refined sugars and industrial seed oils, it comes as no surprise that so many people are undernourished. Tariffs on nutrients and dietary ingredients would only be encouraging more calories with less nutrition.

Dietary supplements support nutrition, wellness and reduce chronic disease, and wellness for millions of Americans safely every day, including families, seniors, veterans, and other vulnerable populations. Designated by the Department of Homeland Security as critical infrastructure during COVID-19, our industry bolsters public health resilience. Over 70% of our industry comprises small businesses, per the Small Business Administration, making it vulnerable to tariff-related cost increases. Our reliance on global supply chains for essential ingredients—vitamins, minerals, amino acids, and botanical extracts—stems from their unavailability domestically in sufficient quantity or quality. Developing domestic sources requires significant time, investment, and innovation due to complex extraction technologies and environmental regulations. Tariffs risk raising consumer prices by double-digit percentages, disrupting supply chains, and threatening the approximately 300,000 manufacturing and retail jobs, and \$60 Billion (USD) our industry generates annually.



Unlike pharmaceuticals, dietary supplements are regulated as food under the Federal Food, Drug, and Cosmetic Act (FFDCA). They play no role in manufacturing or distributing finished drug products, medical countermeasures, active pharmaceutical ingredients (APIs), or related derivatives, which are the focus of Section 232's national security inquiry. Supplements are subject to mandatory recalls for safety concerns, ensuring robust oversight without implicating the strategic risks associated with pharmaceuticals. Excluding our industry from this inquiry aligns with the FFDCA's framework and the Department's intent to address pharmaceutical supply chain vulnerabilities.

The attached HTUS codes, covering ingredients also used in infant formula, animal feed, and other foods, should be excluded from the Section 232 investigation to prevent price increases and supply disruptions across multiple sectors. We respectfully request that the Department:

1. Exclude the attached HTUS codes from the Section 232 investigation.
2. Expand exemptions to include all essential vitamins, minerals, amino acids, and botanical extracts.
3. Recognize our industry's critical role in public health and infrastructure.
4. Collaborate with Industry to advance domestic manufacturing without compromising consumer access.

We welcome the opportunity to meet or submit formal comments to support these goals. Thank you for your leadership in promoting American health and economic resilience.

Kind regards,

Christine Long, M.S.

Sr. Mgr. Regulatory & Scientific Affairs