



May 7, 2025

Office of Strategic Industries and Economic Security  
Bureau of Industry and Security  
U.S. Department of Commerce  
1401 Constitution Ave. NW  
Washington D.C. 20230

Re: DOCKET BIS-2025-0022, REGULATIONS.GOV ID Number XRIN 0694-XC120

**NatureWorks response to the public consultation:**

NatureWorks welcomes this opportunity to provide input into the investigation to determine the effects on the national security of imports of pharmaceuticals and pharmaceutical ingredients under Section 232 of the Trade Expansion Act of 1962, as amended. NatureWorks appreciates the efforts by the Trump Administration's to work closely with U.S. stakeholders on changes to U.S. trade policies.

NatureWorks is an advanced materials company offering a broad portfolio of biopolymers and biochemicals made from renewable resources. NatureWorks is co-owned by Cargill, an American multinational food corporation based in Minnetonka, Minnesota. NatureWorks production operations are located in Blair, Nebraska and with Corporate Headquarters in Plymouth, Minnesota. NatureWorks naturally advanced Ingeo™ biomaterials are valued for their unique functional properties and used in applications from coffee capsules and hygiene products to food packaging and 3D printing filament.

We welcome this opportunity to comment during this public consultation even though our case is not strongly related to the pharmaceutical sector. Nevertheless, while the tariff codes included in the WTO Pharmaceutical Agreement have been carefully negotiated over time, NatureWorks acknowledges the inconsistency in products which are on this list. Please consider that 39077000 (Poly(lactic acid)) has many more prominent uses other than in pharmaceutical products such as, for example, the ones mentioned in the previous paragraph. NatureWorks would welcome a tariff regime which creates a level playing field for poly(lactic acid) which is imported into the United States but is manufactured outside of the United States, as well as realistic trade agreements for our export markets in the Asia Pacific region. Prior to these actions, the tariff structure which existed was

manageable. With the recent changes our ability to export poly(lactic acid) has been diminished as well as our competitive advantage, while competition outside the United States is operating in a more favorable environment.

NatureWorks recognizes that poly(lactic acid) has a unique global supply and demand situation, and we would like to request a more in-depth analysis. For any policy response to be effective, we believe the Administration will need a clear understanding of global production and consumption, including production and consumption in the United States, and factors affecting manufacturing competitiveness. Without the right conditions to protect domestic production, our industry will be penalized by unfair competition from third countries.

In summary, we appreciate the Administration's efforts to address some important challenges related to pharmaceuticals and pharmaceutical products. However, we are concerned about unintended consequences to our business and U.S. consumers might face if the policy response does not carefully take into consideration the issues mentioned above.

NatureWorks is committed to work more closely with the Administration on developing policies to boost U.S. production and economic growth. We are looking forward to continuing the dialogue with the Administration with future exchanges.

Sincerely,

A handwritten signature in black ink, reading "Erik Ripple". The signature is fluid and cursive, with the first name "Erik" and last name "Ripple" clearly distinguishable.

**Erik Ripple**  
President and CEO