



Council for Responsible Nutrition

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July 1, 2026

Ambassador Jamieson Greer
United States Trade Representative
600 17th Street NW
Washington, D.C. 20508

Re: Section 301 Investigation of Brazil's Acts, Policies, and Practices Related to Digital Trade and Electronic Payment Services; Unfair, Preferential Tariffs; Anti-Corruption Enforcement; Intellectual Property Protection; Ethanol Market Access; and Illegal Deforestation

Docket ID: USTR-2026-0331

91 Fed. Reg. 33854 (June 4, 2026)

Submitted via <https://comments.ustr.gov/s/>

Dear Ambassador Greer,

The Council for Responsible Nutrition (CRN)¹ appreciates the opportunity to submit these comments on behalf of itself and its members in response to the Office of the United States Trade Representative (USTR)'s request for public comments regarding the Section 301 Investigation of Brazil's Acts, Policies, and Practices Related to Digital Trade and Electronic Payment Services; Unfair, Preferential Tariffs; Anti-Corruption Enforcement; Intellectual Property Protection; Ethanol Market Access; and Illegal Deforestation (Docket ID: USTR-2026-0331; 91 Fed. Reg. 33854 [June 4, 2026]).

CRN is the leading trade association representing dietary supplement and functional food manufacturers, ingredient suppliers, and service providers. Our members produce the majority of dietary supplements consumed in the United States, contributing significantly to domestic employment, manufacturing, public health, and economic resilience. CRN urges USTR to ensure that the final Annex of exemptions retains the dietary supplement and functional food ingredients already included and adds those identified in these comments. Approximately 75 percent of American adults use dietary supplements, and these ingredients are essential inputs to products they rely on for their health. Including them in the Annex would protect U.S.-based

¹ The Council for Responsible Nutrition (CRN), founded in 1973 and based in Washington, D.C., is the leading trade association representing the dietary supplement and functional food industry. Bringing together manufacturers, ingredient suppliers, and service providers, CRN unites its member companies around a shared commitment to science, transparency, and responsible business practices. Learn more at crnusa.org.

manufacturing, keep these products affordable for American consumers, and support the health and wellness of the Americans who use them.

Executive Summary

The dietary supplement industry is a significant driver of American jobs, economic growth, and tax revenue. Brazil is a critical sourcing country for bovine collagen and a significant supplier of other dietary supplement and functional food ingredients. CRN commends USTR for including a meaningful number of dietary supplement-relevant HTS subheadings in the proposed Annex of exemptions. CRN had, however, previously identified additional products as ingredients relevant to the dietary supplement and functional food industry that are not yet reflected in the Annex. Including in the Annex the full scope of HTS subheadings CRN provided would protect U.S.-based manufacturing, support American consumers' access to these products, and reinforce the health and wellness of the Americans who rely on them.

Specifically, the proposed Annex includes 62 of the 105 HTS subheadings relevant to the dietary supplement and functional food industry that CRN identified in its prior Section 301 comments. Two additional subheadings are only partially exempted due to scope limitations in the Annex. Thus, ingredients classified under 41 subheadings that are critically important to the U.S. dietary supplement and functional food industry are not included in the proposed Annex.

By way of illustration, bovine collagen is among the most commercially significant of the non-exempted ingredients. Brazil accounts for nearly 40 percent of the world supply of bovine collagen, classified under HTSUS 3504.00.50 and by CBP under statistical reporting number 3504.00.5000, and there is no domestic source capable of meeting commercial demand. Failure to include bovine collagen in the Annex would have broad and significantly adverse manufacturing and financial impacts on the domestic industry.

CRN respectfully requests that USTR add bovine collagen and the other identified dietary supplement and functional food ingredients identified in Appendix A to the final Annex of exemptions based on HTS subheading, without scope limitation. In addition, CRN requests that it broaden the two partially exempted subheadings noted above.

1. Dietary Supplements and Functional Foods Support U.S. Health Priorities

Dietary supplements² and functional foods occupy a central place in the Administration's health and wellness agenda. The Make America Healthy Again (MAHA) initiative recognizes that empowering Americans to make better nutritional choices and take proactive steps in managing

² The federal Food, Drug & Cosmetic Act defines a dietary supplement as a product intended to supplement the diet that bears or contains one or more dietary ingredients, including a vitamin, mineral, herb or other botanical, amino acid, dietary substance, concentrate, metabolite, constituent, extract, or combination of such ingredients. See 21 U.S.C. 321(ff)(1).

their own health is foundational to reducing chronic disease, lowering healthcare costs, and strengthening the nation's resilience. Dietary supplements provide Americans with access to essential vitamins, minerals, probiotics, omega-3 fatty acids, botanicals, amino acids, and other nutrients that support general health and wellness. They are not pharmaceuticals.³

The U.S. dietary supplement market reached \$69.3 billion in 2024.⁴ CRN's annual consumer survey revealed in 2024 that approximately 75 percent of American adults use dietary supplements.⁵ Among those supplement users, 91 percent affirm that supplements are essential to maintaining their health, and nearly eight in ten prefer supplements to over-the-counter or prescription medications whenever appropriate.

Dietary supplement use also generates substantial healthcare savings. An independent economic analysis commissioned by CRN found that if high-risk populations used calcium and vitamin D supplements at preventive intake levels to reduce the risk of osteoporosis, the total potential net savings from avoided fractures and hospitalizations could reach \$179 billion over the study period. Broader use of probiotic dietary supplements could yield over \$110 billion in avoided IBS-related productivity losses over the same period. These savings reinforce the case for policies that keep dietary supplements available and affordable for American consumers.⁶

Including these dietary supplement and functional food ingredients in the final Annex supports continued U.S.-based manufacturing of the products that millions of Americans use to support their health and wellness, consistent with the Administration's broader health and economic priorities.

2. Economic Impact and Domestic Manufacturing

One of the unique aspects of dietary supplements is that, although their ingredient inputs are sourced globally, the vast majority of dietary supplement finished products sold in the U.S. are manufactured, packaged, and labeled in the United States. A 2023 economic impact study revealed that the dietary supplement industry supports more than 615,000 American jobs and generates over \$158 billion in total economic output annually.⁷ The industry generates \$6.76 billion annually in state and local taxes and \$10.7 billion in federal taxes.

Brazil is an important sourcing country for this industry. Including the dietary supplement and functional food ingredients identified in these comments in the final Annex would help preserve

³ The federal Food, Drug & Cosmetic Act defines a drug as an article intended for use in the diagnosis, cure, mitigation, treatment, or prevention of disease in humans or other animals. See 21 U.S.C. 321(g)(1).

⁴ "The State of Supplements: U.S. Market Approaches \$70 Billion." *Nutraceuticals World*, April 2, 2025.

⁵ CRN Survey Shows Consistent Supplement Usage with Increase of Specialty Product Use Over Time. Council for Responsible Nutrition. <https://crnusa.org/newsroom/crn-survey-shows-consistent-supplement-usage-increase-specialty-product-use-over-time>.

⁶ CRN, Supplements to Savings (Council for Responsible Nutrition). Available at <https://www.crnusa.org/resources/supplements-savings>.

⁷ Economic Impact Study of the Dietary Supplement Industry. Council for Responsible Nutrition.

the supply chains that underpin U.S.-based finished product manufacturing and protect the American jobs that depend on those supply chains.

3. Brazil as a Source of Critical Dietary Supplement Ingredients

Brazil is a significant supplier of dietary supplement and functional food ingredients to the United States, including bovine collagen, botanical extracts, certain amino acids, and other inputs. For most of these ingredients, Brazil is an important source among a limited set of viable commercial suppliers, and for bovine collagen it is the dominant commercial-scale source, as detailed in Section 4. In each case, the absence of meaningful domestic production means that supply chain disruption would fall directly on U.S.-based finished product manufacturing, which accounts for the majority of dietary supplements sold in this country.

The inability to substitute domestic production is structural, and the specific barriers differ by ingredient. Botanical ingredients face climate and cultivation constraints. Others require specialized processing facilities that do not currently exist domestically at commercial scale. Across these categories, the capital investment required and the biological nature of the inputs mean that supply chains cannot be relocated to the United States in the near term.

4. Bovine Collagen: A Critical Ingredient of Particular Concern

4a. Health Benefits and Market Significance

Collagen is essential for joint, skin, and overall connective tissue health. It is a structural protein found in bones, muscles, tendons, and cartilage, making up three-quarters of the skin and one-third of the total protein in the human body. Collagen production naturally declines with age and clinical studies on supplementation with bovine collagen report improvements in joint and skin health, with ongoing research continuing to explore additional health benefits.

The U.S. consumer market for collagen supplements represents annual sales of \$1.3 billion and an annual growth rate of 12.1 percent.⁸ Collagen products are among the fastest-growing product categories in the dietary supplement market, driven by aging demographics and increased consumer interest in proactive health.

4b. Brazil's Dominant Role in the Global Collagen Supply

Brazil constitutes nearly 40 percent of the world supply of bovine collagen, classified under HTSUS 3504.00.50 and by CBP under statistical reporting number 3504.00.5000. There are no domestic sources that can supply this input at commercial scale. Turkey is the second-largest global exporter of bovine collagen, followed by China, but neither country can produce bovine collagen at the scale and quality necessary to meet U.S. consumer demand.

⁸ Combined Consumption Data: Circana, Stackline, Nielsen IQ and Spins; latest 52 weeks through July 13, 2025.

Bovine collagen is derived from bovine hides, a byproduct of the cattle industry. The primary economic interests of U.S. cattle farmers are in beef, milk, and leather production, not in the sale of hides for collagen extraction. Domestic bovine byproducts are directed to higher-value leather production, and domestic infrastructure is not equipped to process hides for collagen extraction at commercial scale. Imports of bovine collagen therefore do not compete with or undermine the interests of U.S. cattle farmers.

4c. Impact on U.S. Manufacturing and Jobs

While raw bovine collagen is sourced from Brazil, the value-added manufacturing, including processing, packaging, and distribution, occurs in the United States. Because bovine collagen is a raw material input rather than a finished product, stable access to it is what keeps this higher-value work, and the thousands of American jobs across manufacturing, logistics, and retail that depend on it, anchored in the United States. Including bovine collagen in the final Annex therefore supports the Administration's goal of protecting and growing American manufacturing jobs.

4d. Annex Treatment of Bovine Collagen

Bovine collagen, classified under HTSUS 3504.00.50 and by CBP under statistical reporting number 3504.00.5000, is not currently included in the proposed Annex. Its inclusion is fully consistent with the considerations USTR identified for Annex inclusion: it is a necessary raw material, it is not available from domestic or alternative sources at the scale and quality the U.S. market requires, and its inclusion would protect domestic manufacturing while preserving the effectiveness of the action. CRN respectfully urges USTR to add bovine collagen, HTSUS 3504.00.50, including statistical reporting number 3504.00.5000, to the final Annex.

5. Other Dietary Supplement and Functional Food Ingredients: Annex Status and Recommendations

CRN has reviewed the proposed Annex against an illustrative, but not comprehensive, list of HTS subheadings relevant to the dietary supplement and functional food industry. CRN's analysis, detailed in Appendix A, identifies the following:

- **62 HTS subheadings relevant to the dietary supplement and functional food industry are included in the proposed Annex** and would remain exempt if retained in the final action. CRN commends USTR for including these codes and requests that they be retained in the final Annex without narrowing.
- **2 HTS subheadings are only partially exempted under the scope limitations in the proposed Annex.** Specifically, HTSUS 2106.90.99 is limited to acai preparations for the manufacture of beverages, and HTSUS 3301.29.51 is limited to essential oils for religious purposes. CRN requests that these exemptions be broadened to cover dietary supplement and functional food uses.

- **41 HTS subheadings relevant to the dietary supplement and functional food industry are not included in the proposed Annex.** These include bovine collagen, botanical extracts, certain amino acids, encapsulation materials, and other inputs used in finished supplement manufacturing in the United States. CRN requests that these subheadings be added to the final Annex.

For bovine collagen, the highest-priority ingredient, Brazil is the dominant commercial-scale source, and no domestic alternative exists at the scale and quality the U.S. market requires. Brazil also supplies a range of other dietary supplement and functional food ingredients needed by U.S. manufacturers. Adding these subheadings to the final Annex would help keep these products made in the United States and accessible to the consumers who rely on them.

6. Policy Recommendations

CRN respectfully urges USTR to protect the U.S. dietary supplement and functional food industry's vital role in supporting the health, jobs, and economy of Americans. CRN recommends that USTR:

1. **Add bovine collagen to the final Annex of exemptions.** Specifically, add HTSUS 3504.00.50, including bovine collagen classified by CBP under statistical reporting number 3504.00.5000. Brazil is the dominant global supplier, there is no domestic production at commercial scale, and the product aligns with the factors USTR identified for considering Annex inclusion.
2. **Retain all 62 HTS subheadings** currently included in the proposed Annex that are relevant to the dietary supplement and functional food industry, and do not narrow them in the final action.
3. **Broaden the 2 partially exempted subheadings** to provide full exemption for dietary supplement and functional food ingredient imports under those codes, including dietary supplement and functional food preparations under HTSUS 2106.90.99 and dietary supplement and functional food essential oils under HTSUS 3301.29.51.
4. **Add the 41 HTS subheadings identified in Appendix A** that are not currently included in the Annex. These ingredients cannot be produced domestically at commercial scale, are important to domestic manufacturing and consumer access, and including them in the Annex would advance the goal of keeping supplements available and affordable for American consumers.
5. **Keep U.S.-based manufacturing and distribution jobs anchored at home** by including in the final Annex the dietary supplement and functional food ingredients that domestic producers depend on.

Ambassador Greer

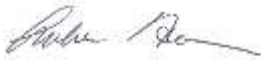
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7. Conclusion

CRN appreciates USTR's careful consideration of the role dietary supplements and functional foods play in supporting both the health of American consumers and the U.S. economy. Including these dietary supplement and functional food ingredients in the final Annex advances shared goals of supporting American manufacturing and keeping these products accessible to U.S. consumers. CRN respectfully requests that USTR retain the subheadings already included in the proposed Annex, expand the subheadings that are only partially included, and add the subheadings that are not yet included, as identified in Table 3 in Appendix A to these comments, prioritizing bovine collagen classified under HTSUS 3504.00.50 (statistical reporting number 3504.00.5000).

Sincerely,



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Appendix A.

Dietary Supplement and Functional Food Ingredient HTS Subheadings: Brazil Section 301 Annex Status

This appendix sets out CRN’s assessment of the Annex status of HTS subheadings of key relevance to the dietary supplement and functional food industry under the proposed Brazil Section 301 action (Docket ID: USTR-2026-0331).⁹

“In Annex” indicates subheadings already proposed for exemption. “Partial Exemption” indicates subheadings where the proposed Annex covers only a portion of relevant imports because the Annex uses an “Ex” product limitation. “Not in Annex” indicates subheadings for which CRN requests inclusion in the final exemption list.

Table 1: HTS Subheadings IN the Proposed Annex (62 subheadings — CRN Requests Retention)

HTS Subheading	Description
0910.11.00	Ginger, neither crushed nor ground
0910.30.00	Turmeric (curcuma)
1106.20.90	Flour, meal and powder of sago, or of roots or tubers of heading 0714 (excluding Chinese water chestnuts)
2101.11.29	Extracts, essences and concentrates of coffee, other
2101.20.20	Extracts, essences and concentrates of tea or mate
2519.90.10	Fused magnesia; dead-burned magnesia
2530.90.80	Other mineral substances, not elsewhere specified
2710.19.45	Mixtures of hydrocarbons not elsewhere specified, containing not over 50% of any single hydrocarbon compound
2804.90.00	Selenium
2827.31.00	Chlorides of magnesium
2833.29.51	Other sulfates nesoi
2907.29.90	Other polyphenols, nesoi
2914.62.00	Coenzyme Q10 (ubidecarenone)
2914.69.90	Quinones, nesoi

⁹ Notice of Determination and Request for Comments Concerning Action Pursuant to Section 301: Brazil's Acts, Policies, and Practices Related to Digital Trade and Electronic Payment Services; Unfair, Preferential Tariffs; Anti-Corruption Enforcement; Intellectual Property Protection; Ethanol Market Access; and Illegal Deforestation, 91 Fed. Reg. 33854 (June 4, 2026).

HTS Subheading	Description
2916.19.30	Unsaturated acyclic monocarboxylic acids, nesoi
2918.16.50	Salts and esters of gluconic acid
2918.19.60	Malic acid
2918.19.90	Carboxylic acids with alcohol function but without other oxygen function, other
2921.19.61	N,N-dialkyl-2-chloroethylamines and protonated salts; acyclic monoamines, nesoi
2922.41.00	Lysine and its esters and salts
2922.42.50	Glutamic acid and its salts, other than monosodium glutamate
2922.49.10	m-Aminobenzoic acid and other specified aromatic amino-acids and esters
2922.49.26	Aromatic amino-acids, esters and salts, drugs
2922.49.49	Other amino acids
2922.49.80	Non-aromatic esters of amino acids and salts thereof, nesoi
2922.50.50	Amino-alcohol-phenols, amino-acid-phenols and other amino-compounds with oxygen function, other
2923.20.20	Lecithins and other phosphoaminolipids, nesoi
2923.90.01	Quaternary ammonium salts and hydroxides, nesoi
2924.19.11	Acyclic amides, including acyclic carbamates
2924.19.80	Acyclic amide derivatives; salts thereof, nesoi
2925.29.90	Non-aromatic imines and their derivatives; salts thereof, other
2930.90.49	Nonaromatic organo-sulfur acids, nesoi
2930.90.92	Organo-sulfur compounds, other
2931.90.90	Other organo-inorganic compounds, other
2932.19.51	Nonaromatic compounds containing an unfused furan ring
2932.99.61	Aromatic heterocyclic compounds with oxygen hetero-atom(s) only, described in additional U.S. note 3 to section VI, nesoi
2932.99.90	Nonaromatic heterocyclic compounds with oxygen hetero-atom(s) only, nesoi
2933.99.12	Specified aromatic heterocyclic compounds with nitrogen hetero-atoms only
2936.21.00	Vitamin A and derivatives
2936.22.00	Vitamin B1 (thiamine) and derivatives
2936.23.00	Vitamin B2 (riboflavin) and derivatives
2936.24.01	Vitamin B5 (pantothenic acid) and derivatives
2936.25.00	Vitamin B6 (pyridoxine) and derivatives

HTS Subheading	Description
2936.26.00	Vitamin B12 (cyanocobalamin) and derivatives
2936.27.00	Vitamin C (ascorbic acid) and derivatives
2936.28.00	Vitamin E (tocopherols) and derivatives
2936.29.10	Folic acid and derivatives
2936.29.16	Niacin and niacinamide
2936.29.20	Aromatic or modified aromatic vitamins and derivatives, other than drugs
2936.29.50	Other vitamins and derivatives, nesoi
2936.90.01	Vitamins or provitamins, intermixtures, in any solvent
2937.90.45	Amino-acid derivatives of hormones, other
2938.90.00	Glycosides, natural or reproduced by synthesis, and salts, ethers, esters and derivatives
2940.00.60	Sugars, chemically pure, other
3001.90.01	Glands and other organs for organotherapeutic uses, dried
3203.00.80	Coloring matter of vegetable or animal origin, other
3204.18.00	Carotenoid coloring matters and preparations
3906.90.50	Acrylic polymers in primary forms, other than plastics or elastomers
3912.31.00	Carboxymethylcellulose and its salts
3912.39.00	Cellulose ethers, other than carboxymethylcellulose, in primary forms
3912.90.00	Cellulose and its chemical derivatives, nesoi, in primary forms
3913.90.20	Polysaccharides and their derivatives, nesoi, in primary forms

CRN requests that all subheadings in Table 1 be retained in the final Annex without narrowing.

Table 2: Partially Exempted Subheadings (2 subheadings — CRN Requests Full Exemption for Dietary Supplement and Functional Food Uses)

HTS Subheading	Description / Scope Limitation	CRN Request
2106.90.99	Food preparations not elsewhere specified or included, other -- Annex covers only acai preparations for the manufacture of beverages	PARTIAL -- Expand to cover dietary supplement and functional food preparations under this code, not only acai beverage preparations.
3301.29.51	Essential oils other than citrus, nesoi -- Annex covers only those for religious purposes	PARTIAL -- Expand to cover dietary supplement and functional food essential oils, not only essential oils for religious purposes.

CRN requests that the scope limitations on these subheadings be removed or broadened for all dietary supplement and food uses, providing full exemption for relevant imports.

Table 3: HTS Subheadings NOT in the Proposed Annex (41 subheadings — CRN Requests Addition)

PRIORITY: HTSUS 3504.00.50, including bovine collagen classified under statistical reporting number 3504.00.5000 — Brazil supplies approximately 40 percent of world bovine collagen; no domestic commercial-scale alternative exists.

HTS Subheading	Description
3504.00.50 (3504.00.5000)	Peptones and derivatives; other protein substances and derivatives; hide powder, other (BOVINE COLLAGEN) – PRIORITY
1006.30.90	Rice, semi-milled or wholly milled, other
1108.20.00	Inulin
1211.90.89	Plants and parts of plants used primarily in pharmacy, perfumery, or similar purposes, fresh or dried, other
1212.21.00	Seaweeds and other algae, fit for human consumption
1301.90.91	Lac; natural gums, resins, gum-resins and oleoresins, other
1302.19.41	Vegetable saps and extracts, pectic substances, agar-agar and other mucilages, other
1302.19.91	Vegetable saps and extracts, other
1302.20.00	Pectic substances, pectinates and pectates
1504.20.60	Fats and oils of fish, other than liver oils, other
1515.30.00	Castor oil and its fractions
1515.90.81	Other fixed vegetable or microbial fats and oils, other
1516.10.00	Animal fats and oils and their fractions
1516.20.91	Vegetable fats and oils and their fractions, other
1518.00.20	Linseed or flaxseed oil
1603.00.90	Extracts and juices of meat, fish or crustaceans, other
1702.30.40	Glucose and glucose syrup, less than 20% fructose, other
1901.90.91	Malt extract; food preparations of flour, groats, meal, starch or malt extract, other
2009.89.65	Cherry juice
2106.90.00	Food preparations not elsewhere specified or included, other
2106.90.92	Food preparations nesoi, containing over 65% sugar, quota-entry category
2106.90.97	Food preparations nesoi, containing over 10% sugar, other
2519.90.50	Natural magnesium carbonate; other magnesium oxide

HTS Subheading	Description
2811.22.50	Silicon dioxide, other
2835.24.00	Phosphates of potassium
2905.43.00	Mannitol
2906.13.10	Inositols
2915.70.01	Palmitic acid, stearic acid, their salts and esters
2917.19.17	Polycarboxylic acids, acyclic, other
2918.14.00	Citric acid
2918.15.10	Sodium citrate
2918.15.50	Salts and esters of citric acid, other
2922.49.43	Glycine (aminoacetic acid)
2930.40.00	Methionine
2933.39.61	Heterocyclic compounds with nitrogen hetero-atom(s) only, products described in additional U.S. note 3 to Section VI
3203.00.10	Coloring matter of vegetable or animal origin, annatto/marigold
3505.10.00	Dextrins and other modified starches
3824.99.41	Fatty substances of animal or vegetable origin and mixtures thereof, other
3824.99.93	Chemical products and preparations (including those consisting of mixtures of natural products), nesoi
9602.00.10	Worked unhardened gelatin and articles thereof -- unfilled gelatin capsules
9602.00.50	Worked unhardened gelatin and articles thereof, other

These subheadings cover ingredients used as raw materials, intermediate inputs, excipients, or encapsulation materials in dietary supplement and functional food manufacturing. Brazil is an important commercial ingredient source and domestic production is limited or absent, so their inclusion in the final Annex would help maintain stable supply for U.S. manufacturers. CRN requests that USTR add these subheadings to the final Annex, with particular priority given to bovine collagen, classified under HTSUS 3504.00.50 (statistical reporting number 3504.00.5000).