

July 9, 2026

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

Re: Request for Comments on the Scope and Operation of a Mechanism to Promote Reciprocal Managed Trade with China

Docket ID: USTR-2026-0430

91 Fed. Reg. 34269 (June 5, 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 comments on the scope and operation of a mechanism to promote reciprocal managed trade with China (Docket ID: USTR-2026-0430; 91 Fed. Reg. 34269 [June 5, 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 include the China-origin vitamin ingredients identified in these comments among the non-sensitive products eligible for favorable modification of additional, non-MFN tariffs under the Board of Trade mechanism. CRN's request is limited to favorable modification of additional, non-MFN tariffs on non-sensitive vitamin inputs and does not seek any change to ordinary MFN duties, antidumping or countervailing duty measures, or other trade-remedy proceedings. Approximately 75 percent of American adults use dietary supplements², and these ingredients

¹The 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.

² 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>.

are essential inputs to the products they rely on for their health. Reducing the additional tariffs on these non-sensitive ingredients would protect U.S.-based 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. CRN supports the Administration's objective of a balanced and reciprocal trade relationship with China, and writes to identify a targeted set of non-sensitive consumer health goods that are well suited to the favorable tariff modification this mechanism contemplates: China-origin vitamin ingredients.

CRN is not requesting broad relief across all supplement-related tariff lines. Instead, CRN identifies a focused subset of vitamin inputs for which China-origin imports are material, domestic substitution is limited or absent, and additional tariffs raise costs for U.S.-based finished product manufacturing. The supporting trade data are strong. USITC DataWeb import data for 2023–2025 show that China is the dominant or major source of U.S. imports for the priority vitamin lines identified in these comments, including roughly 70 percent of vitamin C imports, 64 percent of vitamin E imports, and approximately 58 to 88 percent across the principal B vitamins.

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

Dietary supplements³ and functional foods are closely aligned with 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 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, and they are regulated as a distinct product category from pharmaceuticals.⁴

The U.S. dietary supplement market reached \$69.3 billion in 2024.⁵ CRN's annual consumer survey revealed in 2024 that approximately 75 percent of American adults use dietary

³The 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).

⁴The 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).

⁵"The State of Supplements: U.S. Market Approaches \$70 Billion." *Nutraceuticals World*, April 2, 2025.

supplements.⁶ 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.⁷

Dietary supplement use also generates substantial healthcare savings. An independent economic analysis commissioned by the CRN Foundation found that if high-risk older adults used vitamins B6, B9 (folate), and B12 at preventive intake levels to slow cognitive decline, the cumulative net savings from avoided dementia-related hospitalizations could reach nearly \$110 billion from 2022 to 2030, a return of roughly \$7.50 for every dollar spent on supplementation.⁸ The same analysis found that targeted use of calcium and vitamin D to reduce the risk of osteoporosis could yield up to \$179 billion in net savings from avoided fractures and hospitalizations over the study period.⁹ These savings reinforce the case for policies that keep dietary supplements available and affordable for American consumers.

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.¹⁰ The industry generates \$6.76 billion annually in state and local taxes and \$10.7 billion in federal taxes.

China is the principal source of the priority vitamin inputs identified in these comments. Reducing the additional, non-MFN tariffs on the China-origin vitamin ingredients identified in these comments would lower input costs for U.S.-based finished product manufacturing, preserve the supply chains that underpin it, and protect the American jobs that depend on those supply chains.

3. China-Origin Dietary Ingredients Are Non-Sensitive Goods

Dietary ingredients, including vitamins, minerals, amino acids, and related nutritional substances, are non-strategic and non-dual-use consumer health goods. They do not constitute advanced technology, are not defense related, and present no national security or supply-chain-resilience concern. They are consistent with the non-sensitive consumer goods this mechanism is intended to address. These ingredients are used to produce finished dietary supplements and

⁶CRN 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>.

⁷CRN Survey Shows Consistent Supplement Usage. Council for Responsible Nutrition.

⁸CRN, Supplements to Savings (Council for Responsible Nutrition). Available at <https://www.crnusa.org/resources/supplements-savings>.

⁹Supplements to Savings. Council for Responsible Nutrition.

¹⁰Economic Impact Study of the Dietary Supplement Industry. Council for Responsible Nutrition.

fortified foods consumed by most Americans. Appendix A sets out an illustrative, but not comprehensive, list of HTS subheadings of key relevance to the dietary supplement and functional food industry, all of which CRN submits are non-sensitive within the meaning of this notice. From within that broader set, CRN's affirmative request focuses on the vitamin lines described in Section 4.

4. Vitamins: Priority China-Origin Ingredients of Particular Concern

4a. Health Benefits and Market Significance

Vitamins are essential micronutrients and among the most widely used dietary supplement ingredients in the United States. These ingredients are foundational inputs to multivitamins, single-nutrient supplements, and fortified foods consumed by most Americans. As inputs, they are purchased by U.S. manufacturers and formulators rather than directly by consumers, and U.S.-based production of finished vitamin products depends on stable, affordable access to these ingredients.

4b. China's Dominant Share of U.S. Vitamin Imports

China is the dominant source of U.S. imports for the priority vitamin lines identified below. The table below sets out, for each priority ingredient, the HTSUS subheading, recent U.S. import values from China, and China's share of total U.S. imports, with the source identified. China's share of U.S. imports for these lines has remained consistently high across recent years. These data show that China remains a critical source of vitamin inputs for the U.S. dietary supplement and functional food industry. Despite the existence of additional tariffs on China-origin products for several years, U.S. manufacturers have had limited ability to identify reasonable alternative supply sources, whether domestic or foreign, that can reliably meet the industry's needs at the necessary scale, cost, specifications, and supplier-qualification standards. Favorable tariff modification would therefore reduce costs for U.S.-based manufacturing operations and help preserve value-added production in the United States.

Priority China-Origin Vitamin Ingredients

Dietary ingredient	HTSUS / HS	Annual U.S. imports from China (2023-2025 average)	China share of total U.S. imports (2023-2025 average)	Source
Vitamin B1 (thiamine)	2936.22.00	\$46.2M	85.8%	USITC DataWeb, HTS-10 dataweb.usitc.gov
Vitamin B2 (riboflavin)	2936.23.00	\$24.6M	58.0%	
Vitamin B5 (pantothenic acid)	2936.24.01	\$39.3M	72.2%	

Dietary ingredient	HTSUS / HS	Annual U.S. imports from China (2023-2025 average)	China share of total U.S. imports (2023-2025 average)	Source
Vitamin B6 (pyridoxine)	2936.25.00	\$30.3M	87.6%	
Vitamin B12 (cyanocobalamin)	2936.26.00	\$49.0M	83.9%	
Vitamin C (ascorbic acid)	2936.27.00	\$128.2M	69.9%	
Vitamin E (tocopherols)	2936.28.00	\$277.6M	63.7%	
Folic acid and derivatives	2936.29.10	\$10.4M	56.5%	
Niacinamide	2936.29.16.30	\$28.6M	88.0%	
Vitamin D and derivatives	2936.29.50.20	\$28.4M	50.4%	
Biotin	2936.29.50.30	\$15.6M	75.7%	

Note: Annual U.S. import values from China reflect the average annual customs value for 2023–2025, calculated from USITC DataWeb, Imports for Consumption, Customs Value, HTS-10 level, based on queries run in July 2026. China import shares are calculated as total China-origin imports for 2023–2025 divided by total U.S. imports from all countries for the same period. Niacinamide (2936.29.16.30), vitamin D and derivatives (2936.29.50.20), and biotin (2936.29.50.30) are 10-digit statistical reporting lines under their respective HTSUS 8-digit headings and are reported separately to reflect their distinct import patterns. Official U.S. import statistics are available from USITC DataWeb at <https://dataweb.usitc.gov/>.

4c. Limited Domestic Production

Domestic commercial production of these vitamins is limited to nonexistent at the scale needed to meet U.S. dietary supplement and functional food manufacturing demand. For these non-sensitive vitamin inputs, targeted favorable modification would help U.S.-based manufacturers, contract manufacturers, and formulators maintain reasonable and accessible prices for finished supplements and fortified foods produced in the United States. Favorable modification would help keep value-added manufacturing, packaging, quality, warehousing, and distribution jobs anchored in the United States.

4d. Tariff Treatment and Tariff Inversion

The nominated vitamin lines under heading 2936, when imported from China, are covered by the China Intellectual Property/Forced Technology Transfer Section 301 List 3 action and, absent an applicable exclusion or other special rule, are subject to the additional 25 percent Section 301 duty. USTR has also proposed an additional 12.5 percent Section 301 duty on imports from

China pursuant to its ongoing Forced Labor Import Prohibition Section 301 investigation.¹¹ These and potentially other tariffs are the additional, non-MFN tariffs CRN asks USTR to consider for favorable modification under the Board of Trade mechanism. In some downstream classifications, the additional tariff on an imported vitamin input may exceed the tariff on the corresponding finished supplement, creating a tariff inversion that can discourage U.S.-based formulation and manufacturing. Targeted modification of these non-sensitive inputs would help preserve U.S.-based finished-product manufacturing and support American jobs in formulation, packaging, quality, warehousing, and distribution.

5. U.S. Export Opportunities to China

CRN supports including U.S.-manufactured finished dietary supplements and branded nutritional products, including food preparations and other finished products classified under applicable tariff lines, as reciprocal U.S. export opportunities for consideration under the Board of Trade mechanism. China has a large and growing consumer market for dietary supplements, and U.S.-made branded products carry a reputation for quality and safety that supports continued demand. Including these products in the reciprocal arrangement would expand a meaningful U.S. export opportunity and advance the balance the mechanism is intended to achieve.

6. Policy Recommendations

CRN respectfully requests USTR:

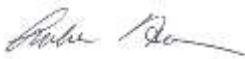
1. Include the priority China-origin vitamin ingredients classified under the HTSUS codes identified in Section 4 among the non-sensitive products eligible for favorable modification of additional, non-MFN tariffs: vitamin C (2936.27.00), vitamin E (2936.28.00), vitamin B12 (2936.26.00), vitamin B5 (2936.24.01), vitamin B1 (2936.22.00), vitamin B6 (2936.25.00), vitamin B2 (2936.23.00), folic acid and derivatives (2936.29.10), niacinamide (2936.29.16.30), vitamin D and derivatives (2936.29.50.20), and biotin (2936.29.50.30).
2. Treat the full set of supplement-relevant subheadings in Appendix A as non-sensitive consumer health goods.
3. Recognize U.S.-made finished dietary supplements as a reciprocal export opportunity in the Chinese market.
4. Take steps to address tariff inversions, where they exist, in which a vitamin input is taxed at a higher rate than the corresponding finished product, consistent with the goal of supporting U.S. manufacturing.

¹¹ *Notice of Determinations and Request for Comments Concerning Actions in Section 301 Investigations of Acts, Policies, and Practices of Various Economies Related to the Failure To Impose and Effectively Enforce a Prohibition on the Importation of Goods Produced With Forced Labor*, 91 FR 34272 [June 5, 2026].

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. The China-origin vitamin ingredients identified here are precisely the kind of non-sensitive consumer health goods this mechanism is designed to address, and U.S.-made finished supplements present a corresponding export opportunity. CRN welcomes the opportunity to serve as a resource as USTR develops and operates the Board of Trade.

Sincerely,



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Appendix A.

Dietary Supplement and Functional Food Ingredient HTS Subheadings Identified as Non-Sensitive (U.S.-China Board of Trade)

This appendix lists the HTS subheadings CRN has identified as relevant to the dietary supplement and functional food industry. CRN submits that all of these are non-sensitive consumer health goods within the meaning of this notice (Docket ID: USTR-2026-0430).¹² Because this proceeding does not propose an Annex of products, the subheadings are presented as a single consolidated list.

HTS Subheading	Description
0910.11.00	Ginger, neither crushed nor ground
0910.30.00	Turmeric (curcuma)
1006.30.90	Rice, semi-milled or wholly milled, other
1106.20.90	Flour, meal and powder of sago, or of roots or tubers of heading 0714 (excluding Chinese water chestnuts)
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
2101.11.29	Extracts, essences and concentrates of coffee other than unflavored instant coffee
2101.20.20	Extracts, essences and concentrates of tea or mate
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
2106.90.99	Food preparations not elsewhere specified or included, other
2519.90.10	Fused magnesia; dead-burned (sintered) magnesia, whether or not containing small quantities of other oxides added before sintering

¹²Request for Comments on the Scope and Operation of a Mechanism to Promote Reciprocal Managed Trade with China, 91 Fed. Reg. 34269 (June 5, 2026); Docket ID USTR-2026-0430.

HTS Subheading	Description
2519.90.50	Natural magnesium carbonate; other magnesium oxide
2530.90.80	Other mineral substances, nesoi
2710.19.45	Mixture of hydrocarbons nesoi, which contain by weight not over 50 percent of any single hydrocarbon compound, from petroleum oils and oils of bituminous minerals (other than crude) or preparations containing by weight 70 percent or more of petroleum oils or oils obtained from bituminous minerals
2804.90.00	Selenium
2811.22.50	Silicon dioxide, other
2827.31.00	Magnesium Chloride
2833.29.51	Other sulfates nesoi
2835.24.00	Phosphates of potassium
2905.43.00	Mannitol
2906.13.10	Inositols
2907.29.90	Other polyphenols, nesoi
2914.62.00	Coenzyme Q10 (ubidecarenone (INN))
2914.69.90	Quinones, nesoi
2915.70.01	Palmitic acid, stearic acid, their salts and esters
2916.19.30	Unsaturated acyclic monocarboxylic acids, nesoi
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
2918.16.50	Salts and esters of gluconic acid, nesoi
2918.19.60	Malic acid
2918.19.90	Nonaromatic carboxylic acids with alcohol function, without other oxygen function, and their derivatives, nesoi
2921.19.61	N,N-Dialkyl (methyl, ethyl, n-Propyl or Isopropyl)-2-Chloroethylamines and their protonated salts; Acyclic monoamines and their derivatives, 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, technical; and other specified aromatic amino-acids and their esters, except those with more than one oxygen function
2922.49.26	Aromatic amino-acids drugs and their esters, not containing more than one kind of oxygen function, nesoi
2922.49.43	Glycine (aminoacetic acid)
2922.49.49	Nonaromatic amino-acids, other than those containing more than one oxygen function, other than glycine
2922.49.80	Non-aromatic esters of amino-acids, other than those containing more than one oxygen function, and salts thereof
2922.50.50	Nonaromatic amino-alcohol-phenols, amino-acid-phenols and other amino-compounds with oxygen function
2923.20.20	Lecithins and other phosphoaminolipids, nesoi
2923.90.01	Quaternary ammonium salts and hydroxides, whether or not chemically defined, nesoi
2924.19.11	Acyclic amides, including acyclic carbamates
2924.19.80	Acyclic amide derivatives; salts thereof, nesoi

HTS Subheading	Description
2925.29.90	Non-aromatic imines and their derivatives; salts thereof, other
2930.40.00	Methionine
2930.90.49	Nonaromatic organo-sulfur acids, nesoi
2930.90.92	Organo-sulfur compounds, other
2931.90.90	Other non-aromatic organo-inorganic compounds
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
2933.39.61	Heterocyclic compounds with nitrogen hetero-atom(s) only, containing an unfused pyridine ring, described in additional U.S. note 3 to section VI of the HTSUS
2933.99.12	6-Bromo-5-methyl-1H-imidazo-(4,5-b)pyridine; 2-sec-butyl-4-tert-butyl-6-(benzotriazol-2-yl)phenol; 2-methylindoline; and other chemicals specified
2936.21.00	Vitamins A and their derivatives, unmixed, natural or synthesized
2936.22.00	Vitamin B1 (Thiamine) and its derivatives, unmixed, natural or synthesized
2936.23.00	Vitamin B2 (Riboflavin) and its derivatives, unmixed, natural or synthesized
2936.24.01	Vitamin B5 (D- or DL-Pantothenic acid) and its derivatives, unmixed, natural or synthesized
2936.25.00	Vitamin B6 (Pyridoxine and related compounds with Vitamin B6 activity) and its derivatives, unmixed, natural or synthesized
2936.26.00	Vitamin B12 (Cyanocobalamin and related compounds with Vitamin B12 activity) and its derivatives, unmixed, natural or synthesized
2936.27.00	Vitamin C (Ascorbic acid) and its derivatives, unmixed, natural or synthesized
2936.28.00	Vitamin E (Tocopherols and related compounds with Vitamin E activity) and its derivatives, unmixed, natural or synthesized
2936.29.10	Folic acid and derivatives, unmixed
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 (including natural concentrates) and intermixtures of the foregoing, whether or not in any solvent
2937.90.45	Amino-acid derivatives of hormones, other
2938.90.00	Glycosides, natural or synthesized, and their salts, ethers, esters, and other derivatives other than rutoside and its derivatives
2940.00.60	Other sugars, nesoi, excluding d-arabinose
3001.90.01	Glands and other organs for organotherapeutic uses, dried, whether or not powdered
3203.00.10	Coloring matter of vegetable or animal origin, annatto/marigold
3203.00.80	Coloring matter of vegetable or animal origin, nesoi
3204.18.00	Carotenoid coloring matters and preparations
3301.29.51	Essential oils other than citrus, nesoi
3504.00.50	Peptones and derivatives; other protein substances and derivatives; hide powder, other (bovine collagen)
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
3906.90.50	Acrylic polymers (except plastics or elastomers), in primary forms, nesoi

HTS Subheading	Description
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
9602.00.10	Worked unhardened gelatin and articles thereof, unfilled gelatin capsules
9602.00.50	Worked unhardened gelatin and articles thereof, other