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Comments from the Council for Responsible Nutrition (CRN)

Re: Section 301 Investigations of Acts, Policies, and Practices of Certain Economies Relating to Structural Excess Capacity and Production in Manufacturing Sectors
Docket Number: USTR-2026-0067
Federal Register Notice 2026-05214, March 17, 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 Investigations of Acts, Policies, and Practices of Certain Economies Relating to Structural Excess Capacity and Production in Manufacturing Sectors (Federal Register Notice 2026-05214, March 17, 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 any tariffs or other trade measures resulting from these investigations expressly exclude dietary supplements, functional foods, and their ingredients. As outlined below, dietary supplement and functional food ingredients frequently share Harmonized Tariff Schedule (HTS) codes with pharmaceutical inputs and other manufactured goods that may be the subject of these investigations, but the dietary supplement and functional food industries are fundamentally different and should not be swept into trade actions targeting other sectors.

[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—advancing a strong, credible marketplace that supports consumer health and industry growth. Through strategic advocacy, self-regulatory leadership, voluntary guidelines, and evidence-based communications, CRN ensures that responsible companies are recognized, protected, and positioned to innovate and compete. Learn more at crnusa.org.

Executive Summary

The dietary supplement industry is a significant driver of American jobs, economic growth, and tax revenue (detailed in Section 2 below). At a time when the Administration is championing the Make America Healthy Again (MAHA) initiative and encouraging Americans to take greater responsibility for their own health and wellness through nutrition and preventive care, dietary supplements and functional foods represent an essential component of that vision. The vast majority of American adults use dietary supplements, and among those users, the overwhelming majority consider supplements essential to maintaining their health.

Most dietary supplement finished products sold in the U.S. are manufactured, packaged, and labeled in the United States. However, many dietary supplement ingredients are not available in sufficient quantity in the United States. These include vitamins[2] and minerals[3] that are classified under HTSUS Chapters 29 (Organic Chemicals) and 30 (Pharmaceutical Products), the same headings used for pharmaceuticals and other manufactured inputs. If these ingredients are inadvertently captured in tariff actions stemming from these Section 301 investigations, there could be severe ramifications to the U.S. manufacturing operations of the dietary supplement industry and for its hundreds of thousands of American employees, along with American consumers and public health, outcomes that rely on the products this industry makes.

CRN recommends that USTR expressly exclude dietary supplements, functional foods, and their ingredients from any tariff or trade measures arising from these Section 301 investigations. CRN further encourages USTR to adopt a nuanced approach that recognizes the robustness of domestic production for certain ingredients while acknowledging that the majority of dietary supplement ingredients cannot feasibly be produced in the United States in the near term.

1. The Dietary Supplement and Functional Food Industry and the MAHA Vision

Dietary supplements[4] and functional foods are central to the Administration's Make America Healthy Again agenda. The MAHA initiative recognizes that empowering Americans to make better nutritional choices and to 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, and other nutrients that support general health and wellness. They are not pharmaceuticals.[5] They are regulated by the Food and Drug Administration (FDA) separately under the Dietary Supplement Health and Education Act of 1994 (DSHEA) within the Federal

[2]See, e.g., HTSUS 2936.29 "Other vitamins and their derivatives."
[3]See, e.g., HTSUS 3004.50.50 "Single or multiple vitamins combined with minerals or other nutrients."
[4]The federal Food, Drug & Cosmetic Act defines a "dietary supplement" as a product (other than tobacco) intended to supplement the diet that bears or contains one or more of the following dietary ingredients: a vitamin; a mineral; an herb or other botanical; an amino acid; a dietary substance for use by man to supplement the diet by increasing the total dietary intake; or a concentrate, metabolite, constituent, extract, or combination of any ingredient described therein. See 21 USC 321(ff)(1).
[5]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 man or other animals. See 21 USC 321(g)(1).

Food, Drug, and Cosmetic Act (21 USC Sec 301 et seq.) and are intended to support general health and wellness, not to treat, cure, or prevent disease.

The U.S. dietary supplement market reached $69.3 billion in 2024.[6] CRN's annual consumer survey revealed in 2024 that approximately 75% of American adults use dietary supplements.[7] Among those supplement users, 91% affirm that supplements are essential to maintaining their health, and nearly eight in ten supplement users report that they prefer using supplements to over-the-counter or prescription medications whenever appropriate. Popular dietary supplements include such diverse products as multivitamins, prenatal vitamins, omega-3 fatty acids, probiotics, fiber, protein, collagen, enzymes, electrolytes, minerals, as well as botanical products such as turmeric and ashwagandha.

Dietary supplement use by Americans also helps lower overall healthcare spending. In 2023, CRN commissioned an independent economic analysis of healthcare savings achieved from dietary supplement use. The Supplements to Savings[8] data demonstrate how specific dietary supplement regimens dramatically lower healthcare costs through disease prevention. For example, 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 study period. These savings directly support the MAHA vision of reducing healthcare and broader societal costs through proactive, nutrition-based approaches to wellness.

Undeniably, American consumers rely on dietary supplements to support their health. Ensuring that dietary supplement and functional food ingredients are not subjected to tariffs would advance the Administration's MAHA goals by keeping U.S.-manufactured dietary supplements available and affordable for Americans while protecting the healthcare and societal savings that flow from dietary supplement use.

2. Economic Impact and Domestic Manufacturing

One of the unique aspects of dietary supplements is that, although the majority of their ingredient inputs are sourced globally, most dietary supplement finished products sold in the U.S. are manufactured, packaged, and labeled in the United States. This is true not only for dietary supplements intended for the domestic U.S. market, but also for a large portion of dietary supplements that are manufactured in the United States for export. The majority of finished product dietary supplement manufacturing occurs in the United States because it is the largest

[6]"The State of Supplements: U.S. Market Approaches $70 Billion." *Nutraceuticals World*, April 2, 2025.
[7]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.
[8]*Supplements to Savings*. Council for Responsible Nutrition. https://www.crnusa.org/resources/supplements-savings.

supplement market in the world, accounting for 34% of the global market.[9]

The U.S. dietary supplement industry is a major driver of American jobs, economic growth, and public health. A 2023 economic impact study revealed that the dietary supplement industry supports more than 616,762 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. These contributions to American jobs, growth, and economic activity have resulted from the industry's substantial investment in finished product manufacturing, packaging, and labeling that occurs here in the United States. The commitment to growing U.S. operations, in turn, has been made possible by well-established supply chains for ingredients that are relatively concentrated in their worldwide availability.

3. Shared HTS Codes and Risk of Inadvertent Inclusion

The Section 301 investigations cover a broad range of manufacturing sectors across 16 economies. Dietary supplement and functional food ingredients are classified across numerous HTSUS chapters that overlap with manufactured goods, chemicals, and pharmaceutical products likely to be the focus of these investigations. These include, among others, chapters covering mineral products, inorganic and organic chemicals, pharmaceutical products, fats and oils, and vegetable extracts. Because any tariff actions resulting from these investigations could be applied on an economy-wide or sector-wide basis, dietary supplement and functional food ingredients classified across these broad chapters are at significant risk of being inadvertently captured. Included as Appendix A is an illustrative but not exhaustive list of dietary supplement ingredients classified under several HTSUS chapters.

CRN is concerned that, because of this overlap in HTS codes, dietary supplement and functional food ingredients could inadvertently be swept into tariff actions resulting from these Section 301 investigations targeting manufacturing overcapacity in other sectors. It is critical that, if USTR pursues sector-specific tariffs under Section 301, those ingredients intended for use in dietary supplements and functional foods be excluded from actions targeting other manufacturing sectors. For those dietary ingredients that are overwhelmingly sourced outside of the United States, their inclusion in trade actions intended to address overcapacity in unrelated sectors could undermine the availability and affordability of U.S.-manufactured products on which millions of Americans rely for their health.

4. Global Supply Chains and Practical Realities

Many dietary supplement ingredients are sourced internationally. This global sourcing is necessary because:

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[9] *Nutrition Business Journal*. Global Supplement Business Report 2024. Informa. https://store.newhope.com/products/global-supplement-business-report-2024.
[10] *Economic Impact Study of the Dietary Supplement Industry*. Council for Responsible Nutrition.

- Certain botanicals cannot easily be cultivated domestically due to various reasons, including climate conditions;
- Fish-derived omega-3 fatty acids are largely sourced from fishing fleets off the coast of South America where these species exist and can be sustainably harvested;
- Bovine collagen cannot be produced in the United States to meet commercial demand, as bovine byproducts are directed to higher-value leather production and domestic infrastructure is not equipped to process hides for collagen extraction at scale; and
- Vitamin and other dietary ingredient synthesis, extraction, and processing often requires highly specialized facilities at scale with substantial capital outlays and waste management limitations which to date are largely located outside of the United States.

Relocating the production of these ingredients to the United States would be prohibitively expensive, impractical, and in many cases, impossible in the near term to meet production needs. While the manufacturing of finished dietary supplement products largely occurs in the United States, these obstacles significantly hinder the relocation of dietary supplement ingredient supply chains. At the same time, finished supplement manufacturers source reliable, high-quality supplies of those ingredients that are available domestically. While domestic product manufacturing drives the thriving dietary supplement marketplace in the United States, action that threatens to erode that U.S. manufacturing basis could have substantial and reverberating economic and public health effects.

5. Risks of Imposing Section 301 Tariffs on Dietary Ingredients

The supplement industry is concerned that, because of the overlap of HTS codes of dietary ingredients with pharmaceutical and other manufactured inputs, these ingredients could inadvertently become subject to a Section 301 action. If dietary supplement and functional food ingredients are subjected to tariffs arising from these investigations, the consequences could include:

- **Potential Pressure on Domestic Manufacturing:** Today, the vast majority of finished product dietary supplement manufacturing occurs in the United States. However, the imposition of significant new tariffs on imported ingredients could alter the economic conditions that currently support U.S.-based manufacturing. Preserving the conditions that keep this manufacturing here should be a priority, and CRN encourages USTR to consider how tariff actions on ingredients could affect the domestic manufacturing base that currently employs hundreds of thousands of Americans.
- **Product Shortages:** Imposing sector-specific tariffs on dietary supplement and functional food ingredients would likely create disruptions in supply chains of ingredients, creating shortages of finished products for U.S. consumers and “out of stocks” on the shelf.

- **Price Increases:** Additional tariffs would raise costs for dietary supplements, including supplements that are critical for public health, such as prenatal multivitamins. Dietary supplement sales are more price sensitive than pharmaceuticals, and demand is more elastic. Additional costs would likely be passed on to consumers as higher prices, ultimately leading to reduced access. At a time when the MAHA initiative is calling on Americans to invest in their own health and nutrition, reducing the accessibility and affordability of dietary supplements and functional foods would directly undermine that mission.
- **Increased Risk of Adulteration:** Higher tariff rates could disrupt established supply chains for the dietary supplement industry and open opportunities for less reputable market entrants. This industry already regularly battles against less reputable entrants who are willing to offer lower quality, adulterated, or contaminated ingredients that harm public health and market integrity. The further stress on pricing from additional tariffs would likely exacerbate those pressures and create temptations to cut corners on quality and engage in economic adulteration to maintain lower costs.

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, and to ensure that the goals of the MAHA initiative are advanced by trade policy. CRN recommends that USTR:

1. Clarify that dietary supplement and functional food ingredients, including those identified in Appendix A, are not within the intended product scope of any tariffs imposed as a result of this Section 301 investigation;
2. Recognize that shared HTS classifications do not indicate that dietary supplements, functional foods, and their ingredients are part of the sectors at issue in this investigation;
3. At a minimum, exempt from any Section 301 tariff action those dietary supplement and functional food ingredients that are eligible for preferential tariff treatment under existing free trade agreements, including the U.S.-Mexico-Canada Agreement (USMCA). Preserving FTA-compliant trade flows supports domestic supply chain operations established pursuant to these agreements, which were designed to deliver mutual benefits to U.S. industry and consumers; and
4. Continue its application of a nuanced approach to trade policies that distinguishes between ingredients with adequate domestic manufacturing capacity and those that are not available from domestic sources at meaningful commercial scale.

Overall, CRN requests USTR preserve the conditions that currently support domestic finished product manufacturing and the more than 616,000 American jobs dependent on this industry.

7. Conclusion

CRN appreciates USTR's careful consideration of the unique role of dietary supplements and functional foods in supporting both public health and the U.S. economy. The dietary supplement industry is aligned with and essential to the Administration's MAHA vision of a healthier America, and CRN stands ready to assist in further discussions to ensure trade policy goals are achieved without unintended harm to domestic manufacturing, public health, and consumer affordability.

Sincerely,

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Council for Responsible Nutrition

Steve Mister, Esq.
President & CEO
Council for Responsible Nutrition

Appendix A.
Illustrative List of Dietary Supplement Ingredients

HTSUS	Description
09101100	Ginger: Neither crushed nor ground
09103000	Turmeric (curcuma)
10063090	Rice: Semi-milled or wholly milled rice, whether or not polished or glazed: Other
11062090	Flour, meal and powder of the dried leguminous vegetables of heading 0713, of sago or of roots or tubers of heading 0714 or of the products of chapter 8: Other
11082000	Inulin
12119089	Plants and parts of plants, of a kind used primarily in perfumery, in pharmacy or for insecticidal, fungicidal or similar purposes: Other: Fresh or dried
12122100	Locust beans, seaweeds and other algae, sugar beet and sugar cane, fresh, chilled, frozen or dried, whether or not ground; fruit stones and kernels and other vegetable products (including unroasted chicory roots of the variety Cichorium intybus sativum) of a kind used primarily for human consumption, not elsewhere specified or included: Fit for human consumption
13019091	Lac; natural gums, resins, gum-resins and oleoresins (for example, balsams): Other
13021941	Vegetable saps and extracts; pectic substances, pectinates and pectates; agar-agar and other mucilages and thickeners, whether or not modified, derived from vegetable products: Other
13021991	Vegetable saps and extracts; pectic substances, pectinates and pectates; agar-agar and other mucilages and thickeners, whether or not modified, derived from vegetable products: Other
13022000	Pectic substances, pectinates and pectates
15042060	Fats and oils and their fractions, of fish or marine mammals, whether or not refined, but not chemically modified: Fats and oils and their fractions, of fish, other than liver oils: Other
15153000	Castor oil and its fractions
15159081	Other fixed vegetable or microbial fats and oils (including jojoba oil) and their fractions, whether or not refined, but not chemically modified: Other
15161000	Animal fats and oils and their fractions
15162091	Vegetable fats and oils and their fractions: Other
15180020	Of linseed or flaxseed oil
16030090	Extracts and juices of meat, fish or crustaceans, molluscs and other aquatic invertebrates: Other
17023040	Glucose (dextrose) And Glucose Syrup, Not Containing Fructose Or Containing In The Dry State Less Than 20% By Weight Of Fructose, Glucose and glucose syrup: Other
19019091	Malt extract; food preparations of flour, groats, meal, starch or malt extract, not containing cocoa or containing less than 40 percent by weight of cocoa calculated on a totally defatted basis, not elsewhere specified or included; food preparations of goods of headings 0401 to 0404, not containing cocoa or containing less than 5 percent by weight of cocoa calculated on a totally defatted basis, not elsewhere specified or included: Other
20098965	Cherry Juice
21011129	Extracts, essences and concentrates, of coffee, tea or maté and preparations with a basis of these products or with a basis of coffee, tea or maté; roasted chicory and other roasted coffee substitutes, and extracts, essences and concentrates thereof: Extracts, essences and concentrates: Other
21012020	Extracts, essences and concentrates, of tea or maté, and preparations with a basis of these extracts, essences or concentrates or with a basis of tea or maté: Extracts, essences and concentrates
21069000	Food preparations not elsewhere specified or included: Other
21069092	Food preparations not elsewhere specified or included: Other: Articles containing over 65 percent by dry weight of sugar described in additional U.S. note 2 to chapter 17
21069097	Food preparations not elsewhere specified or included: Other
21069099	Food preparations not elsewhere specified or included: Other

25199010	Fused magnesia; dead-burned (sintered) magnesia, whether or not cont. small quant. of other oxides added before sintering
25199050	Natural magnesium carbonate (magnesite); fused magnesia; dead-burned (sintered) magnesia, whether or not containing small quantities of other oxides added before sintering; other magnesium oxide, whether or not pure: Other
25309080	Other mineral substances, not elsewhere specified or included
27101945	Mixtures of hydrocarbons not elsewhere specified or included, which contain by weight not over 50 percent of any single hydrocarbon compound
28049000	Selenium
28112250	Other inorganic oxygen compounds of nonmetals: Silicon dioxide: Other
28273100	Chlorides, chloride oxides and chloride hydroxides; bromides and bromide oxides; iodides and iodide oxides: Of magnesium
28332951	Other sulfates nesoi
28352400	Phosphinates (hypophosphites), phosphonates (phosphites) and phosphates; polyphosphates, whether or not chemically defined: Of potassium
29054300	Mannitol
29061310	Inositols
29072990	Phenols; phenol-alcohols: Other: Other
29146200	Coenzyme Q10 (ubidecarenone (INN))
29146990	Ketones and quinones, whether or not with other oxygen function, and their halogenated, sulfonated, nitrated or nitrosated derivatives: Other
29157001	Palmitic acid, stearic acid, their salts and esters
29161930	Unsaturated acyclic monocarboxylic acids, nesoi
29171917	Polycarboxylic acids, their anhydrides, halides, peroxides and peroxyacids; their halogenated, sulfonated, nitrated or nitrosated derivatives: Acyclic polycarboxylic acids: Other
29181400	Citric acid
29181510	Sodium Citrate
29181550	Salts and esters of citric acid: Other
29181650	Salts and esters of gluconic acid
29181960	Malic acid
29181990	Carboxylic acids with alcohol function but without other oxygen function, their anhydrides, halides, peroxides, peroxyacids and their derivatives: Other
29211961	N,N-Dialkyl (methyl, ethyl, N-Propyl or Isopropyl)-2-Chloroethylamines and their protonated salts; Acyclic monoamines and their derivatives, nesoi
29224100	Lysine and its esters and salts thereof
29224250	Glutamic acid and its salts, other than monosodium glutamate
29224910	m-Aminobenzoic acid, technical; and other specified aromatic amino-acids and their esters, except those with more than one oxygen function
29224926	Oxygen-function amino-compounds: Amino-acids, other than those containing more than one kind of oxygen function, and their esters; salts thereof: Other: Other: Drugs
29224943	Glycine (aminoacetic acid)
29224949	Other amino acids
29224980	Non-aromatic esters of amino-acids, other than those containing more than one kind of oxygen function; salts thereof
29225050	Oxygen-function amino-compounds: Amino-alcohol-phenols, amino-acid-phenols and other amino-compounds with oxygen function: Other
29232020	Lecithins and other phosphoaminolipids, nesoi
29239001	Quaternary ammonium salts and hydroxides, whether or not chemically defined, nesoi
29241911	Acyclic amides (including acyclic carbamates)
29241980	Acyclic amide derivatives; salts thereof; nesoi
29252990	Non-aromatic imines and their derivatives; salts thereof
29304000	Methionine

29309049	Nonaromatic organo-sulfur acids, nesoi
29309092	Organo-sulfur compounds: Other
29319090	Other organo-inorganic compounds: Other
29333961	Heterocyclic compounds with nitrogen hetero-atom(s) only: Other: Products described in additional U.S. note 3 to section VI
29321951	Nonaromatic compounds containing an unfused furan ring (whether or not hydrogenated) in the ring
29329961	Aromatic heterocyclic compounds with oxygen hetero-atom(s) only described in additional U.S. note 3 to section VI, nesoi
29329990	Nonaromatic heterocyclic compounds with oxygen hetero-atom(s) only, nesoi
29339912	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
29362100	Vitamins A and their derivatives, unmixed, natural or synthesized
29362200	Vitamin B1 (Thiamine) and its derivatives, unmixed, natural or synthesized
29362300	Vitamin B2 (Riboflavin) and its derivatives, unmixed, natural or synthesized
29362401	Vitamin B5 (D- or DL-Pantothenic acid) and its derivatives, unmixed, natural or synthesized
29362500	Vitamin B6 (Pyridoxine and related compounds with Vitamin B6 activity) and its derivatives, unmixed, natural or synthesized
29362600	Vitamin B12 (Cyanocobalamin and related compounds with Vitamin B12 activity) and its derivatives, unmixed, natural or synthesized
29362700	Vitamin C (Ascorbic acid) and its derivatives, unmixed, natural or synthesized
29362800	Vitamin E (Tocopherols and related compounds with Vitamin E activity) and its derivatives, unmixed, natural or synthesized
29362910	Folic acid and its derivatives, unmixed
29362916	Niacin and niacinamide
29362920	Aromatic or modified aromatic vitamins and their derivatives, nesoi
29362950	Other vitamins and their derivatives, nesoi
29369001	Vitamins or provitamins (including natural concentrates) and intermixtures of the foregoing, whether or not in any solvent
29379045	Hormones, prostaglandins, thromboxanes and leukotrienes, natural or reproduced by synthesis; derivatives and structural analogues thereof, including chain modified polypeptides, used primarily as hormones: Other
29389000	Glycosides, natural or reproduced by synthesis, and their salts, ethers, esters and other derivatives: Other
29400060	Sugars, chemically pure, other than sucrose, lactose, maltose, glucose and fructose; sugar ethers, sugar acetals and sugar esters, and their salts, other than products of heading 2937, 2938 or 2939:, excluding d-arabinose: Other
30019001	Glands and other organs for organotherapeutic uses, dried, whether or not powdered
32030010	Coloring matter of vegetable or animal origin (including dyeing extracts but excluding animal black), whether or not chemically defined; Annato, archil, cochineal, cudbear, litmus, logwood and marigold meal
32030080	Coloring matter of vegetable or animal origin, nesoi
32041800	Carotenoid coloring matters and preparations based thereon
33012951	Essential oils (terpeneless or not), including concretes and absolutes; resinoids; extracted oleoresins; concentrates of essential oils in fats, in fixed oils, in waxes or the like, obtained by enfleurage or maceration; terpenic by products of the deterpenation of essential oils; aqueous distillates and aqueous solutions of essential oils: Other
35040050	Peptones And Their Derivatives; Other Protein Substances And Their Derivatives And Hide Powder, Whether Or Not Chromed, Other
35051000	Dextrins and other modified starches
38249941	Fatty substances of animal or vegetable origin and mixtures thereof

38249993	Prepared binders for foundry molds or cores; chemical products and preparations of the chemical or allied industries (including those consisting of mixtures of natural products), not elsewhere specified or included: Other
39069050	Acrylic polymers in primary forms: Other
39069090	Acrylic polymers in primary forms: Other
39123100	Carboxymethylcellulose and its salts
39123900	Cellulose and its chemical derivatives, not elsewhere specified or included, in primary forms: Other
39129000	Cellulose ethers, other than carboxymethylcellulose and its salts, in primary forms
39139020	Polysaccharides and their derivatives
96020010	Worked vegetable or mineral carving material and articles of these materials; molded or carved articles of wax, of stearin, of natural gums or natural resins, of modeling pastes, and other molded or carved articles, not elsewhere specified or included; worked, unhardened gelatin (except gelatin of heading 3503) and articles of unhardened gelatin: Worked unhardened gelatin and articles thereof: Unfilled gelatin capsules
96020050	Worked vegetable or mineral carving material and articles of these materials; molded or carved articles of wax, of stearin, of natural gums or natural resins, of modeling pastes, and other molded or carved articles, not elsewhere specified or included; worked, unhardened gelatin (except gelatin of heading 3503) and articles of unhardened gelatin: Other