



June 17, 2019

The Honorable Robert Lighthizer
United States Trade Representative
Office of the United States Trade Representative
600 17th Street NW
Washington, DC 20508

Docket Number: USTR-2019-0004

Sent electronically via www.regulations.gov

RE: SOCMA Comments Concerning Proposed Modification of Action Pursuant to Section 301: China's Acts, Policies, and Practices Related to Technology Transfer, Intellectual Property, and Innovation

Dear Ambassador Lighthizer:

The Society of Chemical Manufacturers & Affiliates (SOCMA) appreciates the opportunity to comment concerning proposed modification of action pursuant to Section 301: China's Acts, Policies, and Practices Related to Technology Transfer, Intellectual Property, and Innovation.

SOCMA is the only U.S.-based trade association solely dedicated to the specialty and fine chemical industry – a \$300 billion industry that is fueling high paying jobs in local economies across the United States. SOCMA members play an indispensable role in the global chemical supply chain, providing specialty chemicals to companies in markets ranging from aerospace and electronics to pharmaceuticals and agriculture.

The U.S. Trade Representative (USTR) has proposed up to a 25 percent tariff on approximately \$300 billion worth of imports from China (Tranche 4), which essentially captures all remaining chemicals, with exceptions for certain pharmaceuticals and rare earth minerals. SOCMA respectfully requests that USTR delist Chinese-origin chemical product lines in Harmonized Tariff Schedule (HTS) chapters 9, 13, 15, 21, 28, 29, 32, 33, 34, 35, 37, 38, and 39, from proposed Tranche 4.

There are three foremost reasons why USTR should delist specialty and fine chemical inputs from Tranche 4:

- (I) Specialty chemical manufacturers – as a sector of the chemical industry – are particularly exposed to Tranche 4 tariffs;
- (II) Specialty chemical supply chains are particularly integrated into China; and
- (III) Delisting Chinese-origin chemical inputs will impede Made in China 2025

Following, **Section IV** features a **Data Sheet** listing of hundreds of individual product lines imported by SOCMA members (with 8/10-digit HTS number, chemical name, and Chemical Abstracts Service [CAS] number) as well as corresponding justifications for delisting, which often detail degree of economic harm and whether viable alternate sources exist.

I. Specialty chemical manufacturers – as a sector of the chemical industry – are particularly exposed to Tranche 4 tariffs

More than half of SOCMA members are small- and medium-sized enterprises. Specialty chemistry brings uniquely manufactured substances to market, often through batch production. Specialty chemical manufacturers thus face proportionately higher business costs as a segment within the chemical industry and face equivalent (or potentially lower) net revenues. Many such firms must also concentrate their operations around one or a relatively small number of facilities since the batch-manufactured products they create are not afforded the benefits of scale enjoyed by bulk chemical manufacturers.

Also, batch chemical producers are not single-product companies. Many producers have hundreds of products in their portfolios, each requiring a unique set of inputs. All such inputs are vitally important to the quality and consistency of the final product. Changing any one component, therefore, can have significant effects. While the impact of any individual product imported from China may appear to be minimal, the impact on the overall business of “minimal” occurrences may be massive.

II. Specialty chemical supply chains are particularly integrated into China

Many specialty chemical manufacturers will be disproportionately burdened given the degree to which chemical inputs are often unavailable outside China. To illustrate this point, please consider that chemicals made up nearly half of tariff lines delisted from U.S. Tranche 3. SOCMA sincerely thanks USTR for such recognition of economic hardship, but SOCMA now wishes to further illustrate industry hardships to be incurred if 25 percent tariffs are implemented on certain Chinese-origin chemicals as proposed.

Production of essential chemical inputs in certain sectors moved overseas decades ago. And, shifting sourcing is now particularly difficult since it may require regulatory approval of new sources and inputs. The entire U.S. colorant industry, for example, was known to be “endangered” after the competition of the Uruguay Round in 1994. This was the reason that the Intermediate Chemicals for Dyes Appendix to the U.S. Tariff Schedule was created. SOCMA therefore believes that any item in this appendix should not be included in Tranche 4, especially items that were delisted from previous tranches and now relisted on proposed Tranche 4 (as indicated in Section IV Data Sheet below).

List 4 also proposes significant tariffs on products used by the flavor and fragrances (F&F) industry. The F&F industry utilizes over 3,000 raw materials for industry formulations. These ingredients come from many sources and chemistries, often Chinese, and include both natural and laboratory-created materials.

As proposed, List 4 tariffs will result in significant costs to the F&F industry, which will likely be passed along to American consumers that use end products on a daily basis.

III. Delisting Chinese-origin chemical inputs will impede Made in China 2025

Delisting Chinese-origin chemical inputs will hinder China's Made in China 2025 policy. For years, the People's Republic of China has been incentivizing Chinese manufacturers to move up the value chain. Many products in the past have had export subsidies. Products low on the value chain lost these subsidies years ago.

While roughly half of the overall goods imported from China are inputs, nearly every line item in HTS Chapters 28 (Inorganic chemicals) and 29 (Organic chemicals) by definition is an input that manufacturers import and then use to manufacture new chemicals. By putting tariffs onto raw materials or intermediates coming into the U.S., the Administration is aiding the Chinese plan for 2025. This increase in tariffs will increase the costs of manufacturing higher value products in the U.S. and make the U.S. less globally competitive. Also, if the U.S. is the only manufacturer, the increase would make these markets more attractive for entry. This opens up the door for Chinese companies to move into those markets. The capital costs of manufacturing these higher value products is higher than the lower value chain products. If the global market has higher pricing, it is easier to attract investments into these projects. By keeping the status quo, the Administration keeps domestic manufacturing competitive on the global market and does not incentivize others to enter these high end, technically challenging and expensive-to-enter markets.

IV. SOCMA Data Sheet

In the event that chemical chapters themselves are not delisted, SOCMA urges the Administration to delist HTSUS subheadings contained in the following Data Sheet:

-- Please see below --

SOCMA DATA SHEET – PROPOSED TRANCHE 4

8/10-digit HTS No.	Chemical Name	CAS No.	Description	Viable Alternate Sourcing Destinations	Justifications
1	2917.19.70	Itaconic Acid (Dicarboxylic Acid)	97-65-4	Dicarboxylic Acid is a white organic solid produced industrially by the fermentation of carbohydrates (such as glucose or molasses) using fungi.	None China is currently the only producer of this material. Dicarboxylic Acid is a <u>major component of a new and highly beneficial agricultural product</u> currently produced in the U.S. The product improves fertilizer uptake and reduces fertilizer application rates (and storm water runoff pollution). The significantly increased raw material cost will have a detrimental effect on the cost of the end product. This is likely to <u>discourage use</u> in the Agriculture Industry.
2	0904.12.0000	WHITE TEA P.E.95% POLYPHENOLS			None Most of these are not made elsewhere (or if there is an alternate source it is India)
3	0910.12.0000	GINGER (GROUND) - ORGANIC			
4	1301.90.9130	ACACIA GUM POWDER			None Most of these are for dietary supplement end use

5	1302.12.0000	LICORICE SELECT BLEND MIN 6%				
6	1302.12.0000	LICORICE ROOT 4:1			None	
7	1302.19.4120	PANAX GINSENG EXTRACT 7%			None	
8	1302.19.4140	SOYBEAN EXTRACT ISOFLAVONES			None	
9	1302.19.9140	ADVANTRA-Z 30% WATER SOLUBLE				
10	1302.19.9140	WILD YAM ROOT POWDER				
11	1302.19.9140	HORSETAIL HERB 7% SILICA P.E.				
12	1302.19.9140	HORSECHESTNUT 18%-20% P.E.				
13	1302.19.9140	GOTU KOLA POWDER				
14	1302.19.9140	ELEUTHEROCOCCUS POWDER, H.T.				
15	1302.19.9140	ELEUTHEROCOCCUS 0.8 P.E.				
16	1302.19.9140	ANGELICA ROOT POWDER				
17	1302.19.9140	ANGELICA ROOT 4:1 (DONG QUAI)				

18	1302.19.9140	CARDAMON SEED EXTRACT				
19	1302.19.9140	BLACK CHERRY EXTRACT			None	
20	1302.19.9140	BLUEBERRY LEAVES P.E.			None	
21	1302.19.9140	BURDOCK ROOT EXTRACT 10:1			None	
22	1302.19.9140	DANDELION LEAF P.E. 4:1			None	
23	1302.19.9140	DEVILS'S CLAW			None	
24	1302.19.9140	GINGER ROOT EXTRACT POWDER			None	
25	1302.19.9140	GRAPE SEED EXTRACT			None	
26	1302.19.9140	GREEN TEA EXTRACT 98% POLYLPHE			None	
27	1302.19.9140	GUARANA SEED EXT			None	

28	1302.19.9140	GUARANA SEED EXTRACT			None	
29	1302.19.9140	HUPERZINE A			None	
30	1302.19.9140	LUO HAN GUO EXTRACT-MONK FRUIT			None	
31	1302.19.9140	MILK THISTLE EXTRACT 80%			None	
32	1302.19.9140	MULBERRY LEAF EXTRACT			None	
33	1302.19.9140	OLIVE LEAF EXTRACT			None	
34	1302.19.9140	PTEROCARPUS P.E.			None	
35	1302.19.9140	RESVERATROL 98%			None	
36	1302.19.9140	WOLFBERRY EXTRACT 60%			None	
37	1302.39.0090	ASTAXANTHIN OIL 10%			None	
38	1507.90.40	Soybean Oil Refined Natural	8001-22-7			
39	1515.19.0000	FLAXSEED OIL POWDER			None	
40	1515.90.8090	BLACK CURRANT OIL 15% GLA			None	
41	1515.90.8090	BORAGE OIL			None	
42	1515.90.8090	CAMELLIA (TEA SEED) OIL			None	
43	1515.90.8090	PUMPKIN SEED OIL			None	
44	1516.20.90.00	Captex 355	65381-09-1		China has 25-75% market share	
45	2101.20.2090	GREEN TEA EXTRACT (R10196)				
46	2101.20.2090	GREEN TEA 98/80/50, <.5% CAFF.				
47	2101.20.2090	GREEN TEA 50% POLYPHENOL				
48	2101.20.2090	GREEN TEA 100/90/60<0.5% CAFF.				
49	2101.20.2090	GREEN TEA EXTRACT 50% EGCG/				

50	2101.20.2090	GREEN TEA 90% POLYPHENOLS,				
51	2101.20.2090	SPIRULINA ORGANIC				
52	2102.10.0000	YEAST BETA GLUCAN 70%			None	
53	2102.20.6000	RED YEAST RICE NMT 0.05%			None	
54	2829.90.2500	SODIUM BROMATE			None	
55	2902.19.00	Dipentene 5100	68956-56-9			
56	2903.99.8001	BROMO-3-FLUOROBENZENE, 1-			None	Pharma end use
57	2903.99.8001	BROMOCHLOROBENZENE, 3-			None	Pharma end use
58	2903.99.8001	CHLORO-3,5-DINITROBENZOTRI			None	Pharma end use
59	2904.10.37.00	Musk Ketone	81-14-1			
60	2905.19.90	Dimetol	13254-34-7		China has 25-75% market share	
61	2905.29.90.00	Ethyl Linalool	10339-55-6			
62	2905.32.00.00	Propylene Glycol USP FCC K	57-55-6		China has 25-75% market share	
63	2905.39.90.00	Dipropylene Glycol Fragrance Grade	25265-71-8			
64	2905.43.0000	MANNITOL POWDER				
65	2905.43.0000	MANNITOL ACS			None	Pharma end use
66	2906.11.00.00	L Menthol Crystals USP FCC K	2216-51-5			
67	2906.19.30.00	Terpineol Alpha Natural	98-55-5			
68	2906.19.50.00	Bacdanol	28219-61-6			
69	2906.19.50.00	Dartanol	28219-61-6			
70	2906.19.50.00	Ebanol	67801-20-1			
71	2906.19.50.00	Sandalore	65113-99-7		China has 25-75% market share	
72	2906.29.20.00	Phenoxyanol	55066-48-3			
73	2907.19.80.00	BHT	128-37-0			

74	2909.30.60.00	Dihydro Anethole	104-45-0		None	
75	2909.30.60.00	Methyl Isoeugenol	93-16-3		China has 25-75% market share	
76	2909.50.40	Dihydro Eugenol	2785-87-7			
77	2909.50.40	Eugenol FCC K Natural	97-53-0			
78	2911.00.50.00	Boisambrene Forte	58567-11-6			
79	2911.00.50.00	Methyl Pamplemousse	67674-46-8			
80	2912.19.20.00	Ethyl Methyl Phenyl Glycidate	77-83-8		China has 25-75% market share	
81	2912.19.50.00	Aldehyde C-10 FCC K	112-31-2		China has 25-75% market share	
82	2912.29.10.00	Lilial Low META	80-54-6		China has 25-75% market share	
83	2912.29.60	Amyl Cinnamic Aldehyde	122-40-7			
84	2912.29.60	Hexyl Cinnamic Aldehyde	101-86-0			
85	2912.29.60	Methyl Cinnamic Aldehyde	101-39-3		China has 25-75% market share	
86	2912.29.60	Precyclemone B	52474-60-9			
87	2912.29.60.90	Iso Cyclo Citral	1335-66-6		None	
88	2912.41.0000	VANILLIN			None	
89	2912.49.55.00	Hydroxycitronellal K	107-75-5		China has 25-75% market share	
90	2914.19.00.00	Acetyl Propionyl	600-14-6		None	
91	2914.23.00.00	Methyl Ionone Alpha Extra	127-42-4			
92	2914.23.00.00	Methyl Ionone Iso Raldeine 70	1335-46-2		China has 25-75% market share	

93	2914.29.50.00	Damascenone Total	23696-85-7		China has 25-75% market share	
94	2914.29.50.00	Damascone Alpha-	24720-09-0		China has 25-75% market share	
95	2914.29.50.00	Damascone Beta-	23726-91-2			
96	2914.29.50.00	Damascone Delta-	57378-68-4			
97	2914.29.50.00	Nerone	31375-17-4			
98	2914.29.50.00	Veloutone	65443-14-3			
99	2914.29.50.00	Vertofix Coeur	32388-55-9		China has 25-75% market share	
100	2914.39.90.00	Tonalid	1506-02-1		None	
101	2914.69.9000	IDEBENONE			None	Pharma end use
102	2914.79.4000	CHLORANIL, P-			None	
103	2915.39.20.00	Terpinyl Acetate K	8007-35-0		China has 25-75% market share	
104	2915.39.35.00	Amyl Acetate Primary-	628-63-7		China has 25-75% market share	
105	2915.39.45	Iso Bornyl Acetate	125-12-2		None	
106	2915.60.10.00	Dimethyl Benzyl Carbonyl Butyrate	10094-34-5		None	
107	2915.60.50.00	Manzanate	39255-32-8			
108	2916.19.50.00	Allyl Cyclohexyl Propionate	2705-87-5		None	
109	2916.31.50.00	Hexenyl Benzoate Cis-3-	25152-85-6		China has 25-75% market share	
110	2916.39.7900	BROMOCYCLOBUTENE PHENYLACETIC			None	Pharma end use
111	2916.39.7900	CHLOROBENZOYL CHLORIDE, 4-			None	Pharma end use

112	2916.39.7900	NITROBENZOIC ACID, M-			None	
113	2916.39.7900	NITROBENZOIC ACID, M- SODIUM			None	
114	2916.39.7900	NITROBENZOIC ACID, P-			None	
115	2917.12.50.00	Dimethyl Adipate	627-93-0		None	
116	2917.19.7000	DIMETHYL MALONATE			None	Miscellaneous Tariff Bill-eligible
117	2917.19.7050	DIMETHYL CHLOROMALONATE			None	Pharma end use
118	2917.19.7050	DIPROPIONIC ACID TETRAETHYL			None	
119	2917.34.01	Undecavertol	81782-77-6			
120	2917.39.08	Naphthalic anhydride (1,8 NAA)			None	- Delisted from Tranche 3 - aka Perylene Red, of which SOCMA member is the only U.S. manufacturer. This pigment is used in decorative and industrial paints. The key intermediate required is Naphthalic anhydride (1,8 NAA). This is only produced in China. SOCMA member already operates in a very competitive market against European, Korean and Indian pigment manufacturers making the same products. Adding a 25% tariff leaves SOCMA member at a competitive disadvantage, while

						creating a competitive advantage for foreign competitors who are not burden with the additional tariff on feedstocks.
121	2917.39.1700	Tetrabromophthalic Anhydride	632-79-1	TETRABROMOPHT. ANHYD. - BIG BAG 1000 KG		
122	2917.39.20.00	D E P	84-66-2			
123	2917.39.20.00	Dioctyl Adipate	103-23-1			
124	2918.15.50.00	Triethyl Citrate Natural	77-93-0		China has 25-75% market share	
125	2918.19.90.00	Allyl Amyl Glycolate	67634-00-8		None	
126	2918.23.20.00	Methyl Salicylate FCC K	119-36-8		None	
127	2918.23.50.00	Hexyl Salicylate	6259-76-3			
128	2918.29.25	3-Hydroxy-2-naphthoic acid (BONA)			None	<ul style="list-style-type: none"> - Delisted from Tranche 3. - Also known as Pigment Red 57. This pigment is widely used in the production of printing inks and various coatings. There are many printing ink and coating producers in the U.S., Canada and Mexico. The two largest producers of inks in the U.S., produce this pigment domestically. There are two key intermediates required, one of which is produced in Cincinnati, Ohio. The other intermediate is only available from China. It is

				<p>on the Dyes Intermediate Appendix to the Tariff Schedule (2 Naphthalene carboxylic Acid, 3 Hydroxy CAS 92-70-6) and is therefore imported duty-free into the U.S. in 2918.29.25. This HTS number is included in the fourth tranche. The addition of the proposed 25% tariff will increase the cost of this pigment.</p> <p>- The printing ink and coatings industries are extremely competitive, as is the pigment industry itself. There is tremendous competition, especially from China on this colorant. In this particular instance, there is also a NAFTA rule of origin issue. NAFTA allows for a heading shift to confer origin in these sections of HTS Chapter 32. Pigments are in 3204.17, while inks, paints and coatings, all areas that consume this pigment, are in 3212 through 3215. Therefore, this action will encourage firms in both Mexico and Canada to</p>
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						produce such products from Lithol Rubine imported from China which will then be NAFTA-certified and cross into the U.S. duty-free to the detriment of U.S. producers of this pigment as well as the downstream products.
129	2918.30.90.00	Ethyl Aceto Acetate	141-97-9		China has 25-75% market share	
130	2918.99.5000	ETHYL 3-ETHOXYPROPIONATE			None	Pharma end use
131	2920.90.5100	DIISOPROPYL PHOSPHITE			None	Pharma end use
132	2920.90.5100	PROPYLENE CARBONATE			None	
133	2921.42.55	Fast color bases of aniline derivatives and salts				Delisted from Tranche 3
134	2921.42.6500	BROMO-2-CHLOROANILINE, 5-			None	Pharma end use
135	2921.45.60	Aromatic monoamines and their derivatives and salts described in additional US note 3 to section (ONA)				
136	2921.49.15	m-Nitro-p-toluidine (MNPT)				Delisted from Tranche 3
137	2921.51.2000	COLOR DEVELOPER 2			None	
138	2921.51.2000A	LEUCO CRYSTAL VIOLET			None	
139	2922.29.06	m-Nitro-p-anisidine and m-nitro-o-anisidine as fast color bases (MNOA, MNPA)				Delisted from Tranche 2

140	2926.90.48.01	Cinnamyl Nitrile	1885-38-7		China has 25-75% market share	
141	2926.90.50	Citronellyl Nitrile	51566-62-2			
142	2930.90.2400	N-(Cyclohexylthio)phthalimide	17796-82-6	VULKALENT G CN BOP30025K		
143	2930.90.2400	N-(Cyclohexylthio)phthalimide	17796-82-6	VULKALENT G (DE) KG 25PB/750WP		
144	2930.90.7100	DIBUTYLTHIOUREA, N,N-			None	
145	2931.39.0000	TRIPHENYLPHOSPHINE			None	Miscellaneous Tariff Bill-eligible
146	2931.39.0018	Triphenyl Phosphine	603-35-0	TRPNYLPHOSPHINE		
147	2931.39.0018	BINAP, (R)-			None	Pharma end use
148	2931.39.0018	ETHYL-1-NAPHTHYLAMINE,N-			None	Pharma end use
149	2931.39.0018	OCTADECYLPHOSPHONIC ACID, N-			None	
150	2931.90.9051	BUTYLDIMETHYLCHLOROSILAN E,T-			None	Pharma end use
151	2932.19.10.00	Cetalox	3738-00-9			
152	2932.19.51.00	Strawberry Furanone Natural	3658-77-3			
153	2932.19.51.00	Linalool Oxide	1365-19-1			
154	2932.20.05.00	Coumarin	91-64-5		None	
155	2932.20.50	Nonalactone Gamma	104-61-0		None	
156	2932.20.50.50	Exaltolide Total	106-02-5			
157	2932.20.50.50	Habanolide	34902-57-3			
158	2932.20.50.50	Undecalactone Gamma	104-67-6		None	
159	2932.99.20.00	Calone 1951	28940-11-6		None	
160	2932.99.70.00	Galaxolide 50 DEP	1222-05-5		China has 25-75% market share	

161	2932.99.70.00	Galaxolide 50 IPM	1222-05-5		China has 25-75% market share	
162	2932.99.70.00	Helional	1205-17-0		None	
163	2932.99.90	Ethyl Maltol	11/8/4940		None	
164	2932.99.90.90	Ambrettolide	28645-51-4		China has 25-75% market share	
165	2933.21.00.00	Acetyl Pyridine 2-	1122-62-9		None	
166	2933.99.97.01	2-Acetyl Pyrazine	22047-25-2		None	
167	2934.20.8000	1,2-benzisothiazolin-3-one	2634-33-5	PREVENTOL BIT 85 25KG		
168	2934.99.90.01	Oxane 50% TEC	59323-76-1			
169	3301.12.00.00	Orange Oil CP Natural	8008-57-9			
170	3301.12.00.00	Orange Oil Valencia Natural 5X	8028-48-6			
171	3301.12.00.00	Orange Terpenes Natural	68647-72-3			
172	3301.12.00.00	Orange Valencia Terpeneless Colorless Natural	68606-94-0			
173	3301.13.00.00	Lovage Oil Natural	8016-31-7			
174	3301.13.00.00	Citrus Terpenes Natural	N/A			
175	3301.13.00.00	Lemon Oil California Type Natural	8008-56-8			
176	3301.13.00.00	Lemon Oil Washed Natural	8008-56-8			
177	3301.13.00.00	Lemon Terpenes Natural	68917-33-9			
178	3301.19.10.00	Grapefruit Oil Natural	8016-20-4			
179	3301.19.10.00	Grapefruit Terpenes Natural	68917-32-8			
180	3301.19.51.10	Bergamot BF Natural	68648-33-9			
181	3301.19.51.10	KMart Bergamot Oil BF Natural	68648-33-9			
182	3301.19.51.20	Lime Oil Distilled Natural	8008-26-2			
183	3301.19.51.50	Mandarin Oil Italian Natural	8008-31-8			
184	3301.19.51.50	Tangerine Oil Florida Natural	8008-31-9			
185	3301.24.00.00	Peppermint Oil Prime Yakima FCC K Natural	8006-90-4			

186	3301.24.00.00	Peppermint Oil Redistilled Willamette V Natural	8006-90-4			
187	3301.25.00.10	Cormint Oil Natural	68917-18-0		China has 25-75% market share	
188	3301.25.00.20	Spearmint Oil Far East Natural FCC K	8008-79-5		None	
189	3301.29.10.00	Eucalyptus Oil FCC K Natural	8000-48-4		None	
190	3301.29.1000	EUCALYPTUS OIL			None	
191	3301.29.51	Basil Oil Reunion Natural	8015-73-4			
192	3301.29.51	Birch Tar Natural	8001-88-5			
193	3301.29.51	Bucchu Essence Natural	68650-46-4			
194	3301.29.51	Calamus Oil Natural	8015-79-0			
195	3301.29.51	Celery Seed Oil Natural	8015-90-5			
196	3301.29.51	Orange Flower Absolute Tunisian Natural	68916-04-1			
197	3301.29.51	Chamomile Roman Natural	8015-92-7			
198	3301.29.51	Chamomile Sauvage Natural	68916-68-7			
199	3301.29.51	Coriander Oil Russian Natural	8008-52-4			
200	3301.29.51	Cypress Oil Natural	8013-86-3			
201	3301.29.51	Estragon Oil Natural	8016-88-4			
202	3301.29.51	Fennel Natural	8006-84-6			
203	3301.29.51	Fusel Oil Natural	8013-75-0			
204	3301.29.51	Galbanum Oil Natural	8023-91-4			
205	3301.29.51	Ginger Oil Chinese Natural	8/7/8007			
206	3301.29.51	Myrrh Oil Natural	8016-37-3			
207	3301.29.51	Olibanum Oil Natural	8016-36-2			
208	3301.29.51	Pennyroyal Oil Natural	8013-99-8			
209	3301.29.51	Styrax Oil Natural	1/9/8024			
210	3301.29.51	Tagette Oil Natural	8016-84-0			
211	3301.29.51	Wormwood Oil Natural	8008-93-3			
212	3301.29.51	Armoise Essence Natural	68991-20-8			
213	3301.29.51	Cardamom Oil Natural	8000-66-6			

214	3301.29.51	Carrot Seed Oil Natural	8015-88-1				
215	3301.29.51	Clary Sage Oil American Natural	8016-63-5				
216	3301.29.51	Copaiba Oil Natural	8013-97-6				
217	3301.29.51	Fir Needle Oil Siberian Natural	8021-29-2				
218	3301.29.51	Geranium Oil Natural	8000-46-2				
219	3301.29.51	Marjoram Oil Natural	8016-33-9				
220	3301.29.51	Sage Oil Dalmation Natural	8022-56-8				
221	3301.29.51.05	Caraway Oil Natural	8000-42-8				
222	3301.29.51.09	Cedarleaf Oil Natural	8007-20-3				
223	3301.29.51.09	Cedarwood Oil Virginia Natural	8000-27-9		China has 25-75% market share		
224	3301.29.51.11	Citronella Java Natural	8000-29-1				
225	3301.29.51.13	Clove Leaf Oil Natural	8000-34-8				
226	3301.29.51.18	Lavandin Abrialis N&A	8022-15-9				
227	3301.29.51.18	Lavandin Grosso Natural	8022-15-9				
228	3301.29.51.18	Lavender Natural 40/42	8000-28-0				
229	3301.29.51.25	Nutmeg Oil Select Natural	8008-45-5				
230	3301.29.51.29	Patchouli Oil Natural	9/3/8014				
231	3301.29.51.33	Petitgrain Oil Natural	8014-17-3				
232	3301.29.51.35	Rose Absolute Natural	8007-01-0				
233	3301.29.51.37	Rosemary Oil Tunisian Type Natural	8000-25-7				
234	3301.29.51.42	Vetiver Oil Natural	8016-96-4				
235	3301.29.51.50	Balsam Peru Oil Natural	8007-00-9				
236	3301.29.51.50	Cinnamon Leaf Oil Natural	8015-91-6				
237	3301.29.51.50	Davanna Oil Natural	3/3/8016				
238	3301.29.51.50	Ginger Oil Madagascar Natural	8/7/8007				
239	3301.29.51.50	Litsea Cubeba Natural	68855-99-2		None		
240	3301.29.5113	CLOVE BUD OIL			None		
241	3301.29.5113	CLOVE LEAF OIL REDISTILLED			None		
242	3301.29.5150	GINGER OIL			None		

243	3301.29.5150	GREEN TEA SEED OIL			None	
244	3301.30.00.00	Elemi Resin Natural	9000-75-3			
245	3301.30.00.00	Styrax Resin Natural	8046-19-3			
246	3301.30.00.00	Elemi Oil Natural	8023-89-0			
247	3301.90.10.10	Paprika Ws Oleoresin-	84625-29-6			
248	3301.90.10.20	Black Pepper Oleoresin Natural	84929-41-9			
249	3301.90.10.50	Capsicum WS Oleoresin-	8023-77-6			
250	3301.90.50.00	Beeswax Absolute Max. Natural	8006-40-4			
251	3301.90.50.00	Black Currant Absolute Natural	68606-81-5			
252	3301.90.50.00	Fir Balsam Absoulte Natural	8021-28-1			
253	3301.90.50.00	Immortelle Absolute Natural	8023-95-8			
254	3301.90.50.00	Jasmin Absolute Egypt Natural	8022-96-6			
255	3301.90.50.00	Juniper Berry Oil Natural	8002-68-4			
256	3301.90.50.00	Mimosa Absolute Natural	3/6/8031			
257	3301.90.50.00	Orris Concrete Natural	8002-73-1			
258	3301.90.50.00	Pepper Sichuan SFE Natural	102242-62-6			
259	3301.90.50.00	Tabac Absolute Natural	73138-76-8			
260	3301.90.50.00	Violet Leaf Absolute Natural	8/6/8024			
261	3301.90.50.00	Jasmine Sambac Absolute Natural	X99999-99-9			
262	3302.90.10.10	Timbrox Base N	Blend			
263	3303.00.10.00	Lavandin Grosso N&A	8022-15-9			
264	3402.12.50.00	Triton X-100	9002-93-1			
265	3402.13.10.00	Polysorbate 20	9005-64-5		China has 25-75% market share	
266	3402.13.10.00	Polysorbate 80 /Glycosperse 020 Fg	9005-65-6		China has 25-75% market share	
267	3503.00.5510	GELATIN(PORCINE) 140-160 BLOOM			None	
268	3504.00.1000	GASTRIC MUCIN POWDER			None	

269	3806.90.00.00	Herclyn D	8050-15-5			
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In conclusion, thank you for the opportunity to comment on the proposed modification of action with respect to addressing Chinese industrial policies. Thank you also for your tireless work these past months and for your consideration of SOCMA justifications to delist Chinese-origin products in HTS chapters 9, 13, 15, 21, 28, 29, 32, 33, 34, 35, 37, 38, and 39, from proposed Tranche 4.

Please do not hesitate to reach out if SOCMA can be of further assistance.

Respectfully submitted,

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