



September 6, 2018

The Honorable Robert Lighthizer  
United States Trade Representative  
600 17th Street NW  
Washington, DC 20508  
Docket No. USTR-2018-0026

*Via regulations.gov submission*

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

To Whom It May Concern:

The Society of Chemical Manufacturers & Affiliates (SOCMA) appreciates the opportunity to comment on the Administration's proposed modification of action pursuant to Section 301 of the Trade Act of 1974.

SOCMA is the only U.S.-based trade association solely dedicated to the specialty and fine chemical industry. 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.



SOCMA asks that all individual 8-digit categories in Harmonized Tariff Schedule (HTS) chapters 28, 29, 32 and 38 (including 3808), be delisted from tranche 3. In the unfortunate event that chapters themselves are not delisted, SOCMA asks that various HTS subheadings – which are elaborated upon on an individual basis below – be delisted.

Nearly all chemicals of Chinese-origin are listed on tranche 3. And, since specialty chemical supply chains are particularly integrated into China, SOCMA is increasingly concerned that the proposed additional 10-25 percent tariff on \$200 billion worth of Chinese goods (tranche 3) will place a disproportionate burden on SOCMA members, a majority of whom are small- and medium-sized American companies.

While various justifications for delisting will be elaborated upon below, there are three seminal reasons why the U.S. Trade Representative (USTR) should delist specialty and fine chemical products from tranche 3:

- I. Delisting chemicals will impede Made in China 2025;
- II. Specialty chemical supply chain modification is particularly burdensome and in many cases is not possible in the short- nor medium-term; and
- III. Combination of tranche 3 and retaliatory tariffs will overwhelm some small- and medium-sized domestic specialty chemical companies.

Following elaboration upon these seminal reasons for delisting, SOCMA has provided a Data Sheet that lists individual products and justifications for delisting in a table format. Again, in the event that the aforementioned chapters themselves are not delisted, SOCMA urges the Administration to delist HTS subheadings listed in the Data Sheet, which details hundreds of individual products and whether alternative sources exist.

Lastly, SOCMA supports efforts by the Administration to resolve long-standing concerns with China. Specialty chemical sectors are driven by innovation and intellectual property. Nevertheless, when combined with the fact that roughly one-fifth of China's latest retaliatory lists are chemicals, these proposed tariffs will place burdens on domestic specialty chemical manufacturers that could prove overwhelming, not to mention leave those that survive at a significant competitive disadvantage. In fact, the U.S. Chamber recently estimated that if the Administration were to extend its farmer aid package to other sectors, chemical manufacturers would need \$960 million, putting U.S. chemical manufacturers as the third-most-affected-sector behind farmers and U.S. auto and auto part manufacturers. Thus, while SOCMA supports the Administration's aim to reach zero-tariff trade, imposing significant taxation on American manufacturers — exacerbated by retaliatory tariffs — is not the proper method to achieve that goal.



In general, SOCMA thanks the Administration for the opportunity to comment and supports resolution through constructive and continued dialogue before threatened barriers create additional uncertainty and leads to foreign countries further reducing their dependence on U.S.-made specialty and fine chemicals.

**I. Delisting chemicals will impede Made in China 2025**

Delisting these chemicals will hinder China's Made in China 2025 policy, as per the Administration's goal. 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 and 29 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.

**II. Specialty chemical supply chain modification is particularly burdensome and in many cases is not possible in the short- nor medium-term**

Specialty chemicals, as the name implies, are in fact specially made to meet particular purity, quality and performance demands for numerous downstream sectors. Given these rigid quality standards, alternative sources are extremely finite. For most industry sectors, tariffs mean shifting sourcing which results in a rise in the price of imports. For chemicals, this is not always possible. Dissimilar to other industries, chemical manufacturing requires very costly and specialized infrastructure and expertise. Regulatory burdens and the need for significant capital investment also contribute to the inability to shift production. The speed, or lack thereof, by EPA in permit and pollution systems approvals for new sources of ingredients makes for a slow process and in many cases is a non-starter. In addition, the highly regulated nature of this industry often requires that changes in raw materials and suppliers receive prior approval from U.S. agencies and other world regulators.



To further illustrate this lack of sourcing alternatives, please consider the Miscellaneous Tariff Bill (MTB). This bipartisan legislation provides tariff relief to American companies. Also, since MTB is only applicable to materials that are not manufactured domestically or available in sufficient quantities, passage does not have a negative effect on domestic manufacturers. U.S. chemical manufacturing is a value-added industry in which domestic manufacturers must import chemicals they then use to manufacture new chemicals. As the MTB Act of 2018 awaits the President's signature, chemicals make up over 1,000 of the roughly 1,700 petitions recommended by the U.S. International Trade Commission (US ITC) for tariff relief. This fact – that over half of vetted and cleared MTB petitions are for chemicals – speaks volumes regarding the degree to which chemical intermediates are simply not domestically available. For these reasons, SOCMA also asks that USTR delist HTS subheadings that capture MTB chemicals – doing so would provide much-needed relief and ease burdens on domestic specialty chemical manufacturers, USTR and US ITC.

SOCMA categorizes members' chemicals into three main sectors: (A) Agricultural; (B) Pharmaceutical; and (C) Performance. In effort to further communicate impacts at a more intimate level, please see the below analysis of tranche 3 as applied to each of these sectors:

#### A. Agrochemicals

Roughly 50% of imported agrochemicals are on Tranche 3. This includes pesticides as well as many of the active intermediates. In fact, most of the basic agro-active ingredients are currently produced in China and India, while a low percentage is actually produced in the U.S. The current tariffs and retaliation are already affecting farmers across the country and adding tariffs to important inputs will add to the burden on farmers.

SOCMA members contract to produce formulated pesticides for the agricultural and consumer market. Many of the formulations that SOCMA members produce are from off-patent active ingredients and approximately 30% are imported from China. Currently, some of these materials are only produced in China. While sourcing these materials elsewhere is certainly possible, alternative sources often come at a significant cost due to the complexity of the chemistry, intermediate supply, and planning process required to have materials available for the agricultural season. China exports about \$4.8 billion in pesticides each year and the U.S. imports around \$1 billion of these materials (roughly 20%).

SOCMA members are already seeing disruptions in the Chinese market due to much needed pollution control initiatives. In 2016, Chinese authorities began cracking down on agro-chemical plants. Inspections resulted in shutdowns and increased taxes for waste discharges. China now has a 2020 goal to have 30% less ag-chemical plants than in 2016. These inspections have already diminished the global agrochemical supply. Given that U.S. demand for agricultural pesticide active ingredients is forecast to increase nearly two percent annually to \$2.9 billion in 2020, adding tariffs in addition to shortages will only increase the ultimate cost to farmers.

There are 84,755 large corporate/family farms in the U.S., which contribute to about 80% of agriculture. A 10% tariff on these materials will add a minimum of \$100 million in additional costs to an industry that is already suffering from recent tariffs on goods produced. The increase is likely



much higher too as competition for pesticide materials drives the cost up of other suppliers. A 25% tariff would add a minimum of \$250 million in additional costs.

Also, regarding Chinese retaliation, with the aforementioned Chinese crackdown on chemical companies that do not meet safety and environmental standards, some SOCMA members' sales into Asia and China have increased considerably. SOCMA members are working to grow relationships with Chinese companies based upon quality, service, and reasonable pricing. Once China retaliates against tranche 3, domestic manufacturers will lose this market.

#### B. Pharmaceuticals

An enormous number of Chinese-origin active ingredients and sole use intermediates, both organic and inorganic, are listed on tranche 3. This includes active pharmaceutical ingredients (APIs) and intermediates used to make APIs. What is not included are "Finished Dose" formulations including APIs formulated with excipients.

The proposed tariffs apply to a myriad of drug products including some common drugs like aspirin and insulin. Proposed tariffs also apply to a broad range of specialty and fine chemicals used as starting materials and chemicals used in prescription and over-the-counter (OTC) drug manufacturing.

Approximately 90% of all prescriptions written are for generic drugs. For years, downward pricing pressure on generic drugs has precipitated a move to outsource production to other parts of the globe where labor savings can be achieved. India and China have been the primary beneficiary of this movement, although quality problems at facilities in India have led to a greater reliance on API manufacturing in China. In many cases, Chinese manufacturers have become the sole global supplier of many APIs used in OTC drug products, such as headache and cough and cold remedies. While some APIs are not specifically itemized in tranche 3, many of the specialty and fine chemicals used in the production of prescription pharmaceuticals are included.

While APIs present a major cost factor for all generic medicines, they are by no means the only cost driver. Excipients, binders, coatings and a variety of other specialty and fine chemicals are needed as starting materials in pharmaceutical manufacturing processes. An additional 10-25% tariff on these chemicals will only add to cost factors and will force increases in prescription and OTC retail drug prices. Because so many specialty and fine chemicals are necessary for pharmaceutical manufacturing operations, the net effect will be to increase drug costs even if manufacturing operations are relocated.



For chemical manufacturers, finding new suppliers can be a challenge, but finding suppliers, and qualifying the new supplier facility and raw materials in the pharmaceutical sector can also be very expensive and, more importantly, very time consuming. The highly regulated nature of this industry requires that all such changes in suppliers receive prior approval from the U.S. Food and Drug Administration (FDA) and other world regulators. Revising or initiating new Drug Master Files and amending Abbreviated New Drug Applications to document these changes can easily cost hundreds of thousands of dollars and take anywhere from months to years to accomplish. New quality agreements with new suppliers will need to be put into place. FDA reviews, approvals and inspections will also add to the time it takes to shift production to new suppliers. The time required to make these changes will almost certainly lead to short-term and possibly long-term drug shortages for some of the drugs impacted by these proposed tariffs.

### C. Performance chemicals

The pigment manufacturing sector for example requires particular chemical feed stocks not available outside China. By adding these tariffs, the U.S. would be giving foreign competitors an advantage over domestically produced pigments. Foreign companies will be able to buy feed stocks from China at a lower cost without the added tariff burden, enabling foreign countries to import into the U.S. and sell pigments at a lower cost.

To further demonstrate concerns, please consider Lithol Rubine, also known as Pigment Red 57. This pigment is widely used in the production of printing inks and coatings. There are many printing ink and coatings 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 only producer in the West. The other intermediate is only available from China. It is on the Dyes Intermediate Appendix to the Tariff Schedule (2 Naphthalenecarboxylic 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 third tranche. The addition of the proposed 10-25% tariff will increase the cost of this pigment.

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. Pigments are in 3204.17, while inks, paints and coatings, all areas that consume this pigment, are in 3212 through 3215. NAFTA allows for a heading shift to confer origin in these sections of Chapter 32. Therefore, this action will encourage firms in both Mexico and Canada to produce such products from Lithol Rubine imported from China which will then be NAFTA-certified and enter the U.S. duty free, to the detriment of U.S. producers of this pigment as well as the downstream products.

Additional performance chemicals, like rubber and lubricant additives in HTS Chapters 29 and 38, are slated for tariffs and are detailed in the Section IV Data Sheet. For example, Alpha naphthol is a raw material used in PANA, which is an antioxidant used in jet engine lubrication systems. Every commercial and military plane in the U.S. requires this additive. If raw materials are not available, or too expensive to make the



PANA profitably, the lubricant companies supplying the U.S. Armed Forces will be required to import the PANA from China, and U.S. manufacturing will lose jobs.

**III. Combination of tranche 3 and retaliatory tariffs will overwhelm some small- and medium-sized domestic specialty chemical companies**

More than half of SOCMA members are small- and medium-sized enterprises. Specialty chemistry brings uniquely manufactured substances to market, often through small 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. For specialty chemical companies that cannot afford a 10-25% increase and replace key inputs, inability to shift sourcing is tantamount to a literal cutoff of imports.

Exposure to tranche 3 will depend on the sectors which companies focus and their ability to respond to fluctuations in trade policy conditions. Companies with large global footprint will be advantaged, while small- and medium-sized companies will have less reserves to draw upon when times get tough, and less ability to deflect higher materials prices or pass along new costs to customers.

**IV. SOCMA Data Sheet**

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

**SOCMA Data Sheet**

	<b>8/10-digit HTS No.</b>	<b>Chemical Name</b>	<b>CAS No.</b>	<b>Description</b>	<b>Alternative sources (other than China)</b>	<b>Miscellaneous</b>
1	2812.90.00	Phosphoric Anhydride	1314-56-3			
2	2832.10.90	Sodium Metabisulfite	7681-57-4			

3	2915.29.0000	Nickel acetate				
4	2915.90.90	Triflic Acid	1493-13-6		Only 2-3 sources globally	
5	2916.11.10	Glacial Acrylic Acid	79-10-7			
6	2916.13.10	Methacrylic Acid	79-41-4			
7	2916.14.10	Methyl Methacrylate	80-62-6			
8	2916.39.0300	mNBA, pNBA				
9	2917.14.00	Maleic Anhydride	108-31-6			
10	2918.14.00	Citric acid	77-92-9			
11	2934.20.20	2-Mercaptobenzothiazole	149-30-4	MBT Powder		
12	2815.11.0000	Sodium hydroxide	1310-73-2	Caustic Soda PELS		
13	2924.19.1150	2-Acrylamido-2-methyl-1-propanesulfonic acid sodium salt	5165-97-9	ATBS 2403		
14	3402.90.5050	Trimethylammoniumpropyl methacrylamide chloride	51410-72-1	Mhoromer BM-613		
15	0712.90.4020	Garlic 1% Allicin Granular			Limited	
16	0712.90.4040	Garlic Powder Fermented Black			Limited	
17	0810.30.0000	Red Currant Powder			Limited	
18	0904.12.0000	White Tea P.E.95% Polyphenols			Limited	
19	1211.90.9280	Ginger Root Powder Tea Bags Cut			Limited	
20	1505.00.9000	Lanolin Anhydrous USP			Limited	
21	2707.99.9090	Di-Tert-Butyl-4-(Dimethylamino)			Limited	
22	2805.11.0000	Sodium Metal	7440-23-5		EU	No U.S. sources for bulk material. There are only two bulk suppliers in the world and neither are in the U.S.

23	2805.11.0000	Sodium Copper Chlorophyllin	28302-36-5		U.S. and EU	
24	2805.19.9000	Lithium Metal	7439-93-2		None qualified	U.S. material is from direct competition and very expensive.
25	2811.19.61	Sulfamic acid and other inorganic acids nesoi				
26	2811.19.6190	Ethyl Phosphinic Acid			Limited	
27	2812.17.00	Thionyl chloride				
28	2815.20.0050	Potassium Hydroxide Flake 90%			Limited	
29	2818.30.0000	Aluminum Hydroxide			Limited	
30	2825.10.0000	Hydrazine Dihydroxide			Limited	
31	2826.90.9000	Sodium Hexafluoroantimonate	16925-25-0	Photoacid generator precursor	U.S.	Domestic material is >50% more expensive than Chinese equivalent
32	2827.51.0000	Potassium Bromide			Limited	
33	2827.59.2500	Ammonium Bromide			Limited	
34	2829.19.0100	Ammonium Perchlorate 400um			Limited	
35	2829.90.2500	Sodium Bromate			Limited	
36	2829.90.6100	Ammonium Perchlorate	7790-98-9	Technical/commercial grade "needles"	No U.S. source; material may be available in India but has not been qualified.	This is one of a SOCMA member's most important raw materials. Since NASA discontinued the shuttle program, the availability of U.S. manufactured material of this grade ceased.
37	2833.21.0000	Magnesium Sulfate Dihydrate			Limited	
38	2835.10.0000	Sodium Phosphite Pentahydrate			Limited	

39	2835.29.5100	Ferric Phosphate Anhydrous			Limited	
40	2835.29.5100	Magnesium Ascorbyl Phosphate	114040-31-2	Other phosphates nesoi	Indian, Japan	With the major manufacturers of Ascorbic Acid being in China, many producers of Magnesium Ascorbyl Phosphate are also located in China which has allowed a robust supply of quality product at competitive costs. India and Japan do not offer as large a capacity of this material along with competitive cost.
41	2836.99.3000	Ammonium Carbonate Tech Grade			Limited	
42	2836.99.5000	Copper Carbonate			Limited	
43	2837.11.0000	Sodium Cyanide			Limited	
44	2837.20.5100	Potassium Ferrocyanide			Limited	
45	2840.19.0000	Butyl Azodicarboxylate, Di-tert			Limited	
46	2841.80.00	Tungstates (wolframates)				
47	2841.80.0020	Calcium Tungstate	7790-75-2	China is most competitive supplier and sold to SOCMA member's most important customer in the U.S.	None known to SOCMA member	Application: used as an intermediate for advanced printed circuit board manufacturing in the U.S.
48	2841.80.0050	Sodium Tungstate	10213-10-2	Catalyst	U.S.	Domestic material is >12% more expensive than Chinese equivalent.
49	2841.80.0050	Sodium tungstate Dihydrate	10213-10-2	Production only in China and SOCMA member sells exclusively in the U.S.	None known to SOCMA member	Application: used as an intermediate for advanced printed circuit board manufacturing in the U.S.

50	2843.90.0000	Bis(triphenylphosphine)Palladi			Limited	
51	2846.10.0050	Cerium (IV) hydroxide	12014-56-1	Ceric hydroxide	None	China's rare earth compounds pricing policies (profit is optional) of the late 1990s and 2000s drove the Rare Earth mines in the rest of the world out of business. The mines would be difficult to restart if their owners were still in business. Case in point, the Molycorp Minerals, LLC, Mountain Pass, CA mine.
52	2850.00.5000	Sodium Borohydride	16940-66-2		U.S.	Second qualified source is from China.
53	2850.00.5000	Sodium Hydride	7646-69-7		U.S.	U.S. is from direct competition and very expensive.
54	2850.00.5000	Sodium Borohydride			Limited	
55	2901.10.5000	Dihydroxy Propyl Laurate,2,3-			Limited	
56	2902.90.30	T-Butyl benzene	98-06-3		Qualified source(s) are Chinese only	
57	2902.90.3050	Vinyl Toluene			Limited	
58	2902.90.9000	Tetraphenylethylene			Limited	
59	2903.19.1000	TETRACHLOROETHANE,1,1,2,2-			Limited	
60	2903.19.60	Dichloroethylether	111-44-4	Saturated chlorinated derivatives of acyclic hydrocarbons, nesoi	None known to SOCMA member	Competitors that use this are overseas and will not have a tariff, thus, causing material cost to be higher than competitors'.

61	2903.19.6050	CHLORODODECANE, 1-			Limited	
62	2903.19.6050	CHLORODODECANE, 1-			Limited	
63	2903.29.00	Allyl chloride	107-05-1	Raw material for specialty monomer	None known to SOCMA member	
64	2903.29.0000	Allyl chloride	107-05-1		U.S. produced material is available in rail cars (too much for SOCMA member) or small bottles (too small for SOCMA member)	SOCMA member has found the only place they can buy a few drums of this product is from China.
65	2903.39.2050	Allyl bromide	106-95-6		U.S. produced material is available in rail cars (too much for SOCMA member) or small bottles (too small for SOCMA member)	SOCMA member has found the only place they can buy a few drums of this product is from China.
66	2903.91.20	o-Dichlorobenzene				
67	2903.99.30			Pesticides derived from halogenated derivatives of aromatic hydrocarbons		
68	2903.99.8000	Bis (4-t-butylphenyl) Iodonium Chloride	5421-53-4	SOCMA member is sole commercial supplier in the world and sold exclusively in the U.S.	None known to SOCMA member	Application: used as an intermediate for advanced printed circuit board manufacturing in the U.S.
69	2903.99.8001	BROMO-3-FLUOROBENZENE, 1-			Limited	
70	2903.99.8001	1-bromo-2-isopropylbenzene	7073-94-1		Qualified source(s) are Chinese only	

71	2904.10.0800	Benzene Sulfonyl Chloride	98-09-9	Benzenesulfonyl chloride		BSC is a raw material used in making colored pigment. The business is already operating at a loss, yet SOCMA member continues to make the product in order to avoid laying off up to 8 employees. The business cannot withstand any increase in pricing.
72	2904.10.1000	NAPHTHALENE DISULFONIC ACID,			Limited	
73	2904.10.3200	Chloramine-T trihydrate, aka Chloramine-T, aka N-chloro-p-toluenesulfonamide sodium salt	7080-50-4	Applications include: Odor control, farm hygiene, cooling tower applications, investigative animal drug to prevent gill disease.	None known to SOCMA member	No known U.S. manufacturing. Would directly increase cost to end users (from 10-25% tariff). Conversion to U.S. manufacturing would take time and if converted to U.S. manufacturing, the raw material to make CHT , to SOCMA member's knowledge, is only made in China and thus would be subject to increased 10-25% tariff and increase cost of CHT. Alternative products may possibly be substituted and reduce sales for a U.S. company and possibly effectiveness for the end users.
74	2904.10.5000	Methanesulfonic Acid	75-75-2		EU	

75	2904.20.5000	NITROMETHANE			Limited	
76	2905.14.5050	Tert.-butyl Alcohol, > 98%	75-65-0		Japan	U.S. producers do not make material that meets specifications. Downstream products fail quality testing.
77	2905.16.0010	ETHYL HEXANOL, 2-			Limited	
78	2905.17.0000	CETYL ALCOHOL			Limited	
79	2905.19.1000	ISOAMYL ALCOHOL NATURAL			Limited	
80	2905.19.9090	LITHIUM TRI-TERT-BUTOXYALUMINU			Limited	
81	2905.22.5010	CITRONELLOL			Limited	
82	2905.22.5050	LINALOOL SYNTHETIC			Limited	
83	2905.29.9000	HEPTEN-3-OL, 1-			Limited	
84	2905.29.9000	3-Butyn-1-ol	927-74-2		U.S. and EU	
85	2905.32.0000	PROPYLENE GLYCOL			Limited	
86	2905.39.90	1,10-decanediol	112-47-0	Raw material for specialty monomer	None known to SOCMA member	
87	2905.39.90	1,12-dodecanediol	5675-51-4	Raw material for specialty monomer	None known to SOCMA member	
88	2905.39.9000	Pinacol, DVG	76-09-5		None	NAFTA sourced material is 5x the price and not qualified.
89	2905.39.9000	DIPROPYLENE GLYCOL FRAGRANCE			Limited	
90	2905.41.0000	TRIMETHYLOLPROPANE			Limited	
91	2905.49.3000	XYLITOL			Limited	
92	2905.59.10	1,3-dichloropropanol	96-23-1	Raw material for specialty monomer	None known	
93	2905.59.10	Hexafluoroisopropanol	920-66-1	Raw material for contact lens monomer	U.S.	

94	2905.59.3000	DIBROMONEOPENTYL GLYCOL			Limited	
95	2906.11.0000	MENTHOL CRYSTALS USP			Limited	
96	2906.12.0000	CYCLOHEXANEDIMETHANOL,1-4-90%			Limited	
97	2906.13.1000	INOSITOL			Limited	
98	2906.13.5000	CHOLESTEROL NF			Limited	
99	2906.19.3000	Terpineol			Limited	
100	2906.19.50	1-adamantanol	768-95-6	Raw material for specialty monomer	None known to SOCMA member	
101	2906.21.00	Benzyl Alcohol		Key raw material for SOCMA member's formulations.	Not produced in U.S.	
102	2906.21.0000	BENZYL ALCOHOL			Limited	
103	2906.29.2000	CINNAMYL ALCOHOL			Limited	
104	2907.15.1000	Alpha Naphthol	90-15-3	$\alpha$ -Naphthol	India	Alpha naphthol is a raw material used in PANA, which is an antioxidant used in jet engine lubrication systems. Every commercial and military plane in the U.S. requires this additive. If raw materials are not available, or too expensive to make the PANA profitably, the lubricant companies supplying the U.S. Armed Forces will be required to import the PANA from China, and U.S. manufacturing will lose jobs.

105	2907.15.3000	NAPHTHOL, BETA-			Limited	
106	2907.19.20	2-bromo-4-tert-octylphenol	57835-35-5		Qualified source(s) are Chinese only	
107	2907.19.2000	BUTYLPHENOL, O-TERT-			Limited	
108	2907.19.61	2-(tert-butyl)-4,6-dimethyl phenol	1879-09-0	Raw material for specialty monomer	None known to SOCMA member	
109	2907.19.8000	4-Phenyl Phenol	92-69-3	Monomer precursor	Unknown	Not available domestically
110	2907.21.00	Resorcinol and its salts	108-46-3	RESORCINOL	India	
111	2907.21.0000	ACETYL RESORCINOL, 4-			Limited	
112	2907.21.0000	Resorcinol	108-46-3		India	
113	2907.22.5000	Potassium Hydroquinone Monosulfate	21799-87-1		India	
114	2907.23.0000	BISPHENOL A CYANATE ESTER			Limited	
115	2907.29.05	4-Hydroxyphenyl Ethanol	501-94-0	Raw material for contact lens monomer	None known to SOCMA member	
116	2907.29.0500	4,4'-Sulfonyldiphenol	80-09-1	Bisphenol S-A		
117	2907.29.1000	PYROGALLOL			Limited	
118	2907.29.90	Ortho-dially bisphenol A	1745-89-7		None known to SOCMA member	
119	2907.29.9000	BENZOQUINONE, P-			Limited	
120	2907.29.9000	2-Hydroxybenzyl alcohol	90-01-7	SOCMA member is sole supplier in the world and sold exclusively in the U.S.	None	
121	2908.19.6000	CHLOROPHENOL, O-			Limited	
122	2908.99.4000	DINITRO-2-SEC-BUTYLPHENOL,4,6-			Limited	
123	2908.99.8000	3-trifluoromethyl-4-nitrophenol, aka 4-Nitro-3-(trifluoromethyl)phenol, aka TFM	88-30-2	Used to in a formulated pesticide to control sea lamprey in the U.S. Great lakes.	One Hungarian manufacturer and other European source is a	No U.S. manufacturing, part of MTB petition 110. Only known large scale application for this product

					competitor and not available.	is to control sea Lamprey in the Great Lakes which is a joint program with U.S. and Canada government funding to Great Lakes Fishery Commission (GLFC) for this program. Would significantly and unnecessarily increase costs for this important program which supports the \$7 billion Great Lakes fishery. Putting a tariff on a China-based source could put a European manufacturer at a competitive advantage verses a U.S. based formulator thus potentially costing U.S. jobs and a taking away U.S. manufacturing/formulating and potentially moving it to an EU manufacturer. Pesticide active ingredient with specific EPA manufacturing guidelines already in place. An additional 10-25% tariff to the China source would likely prevent this source from being cost
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						competitive is likely not able to be replaced. Hungarian supply has had supply issues and quality issues and it would pose a huge risk to be singly sourced and thus the Chinese source is preferred.
124	2909.19.1800	Diisopropyl ether	108-20-3		EU	
125	2909.19.6000	BUTYL DIGLYME			Limited	
126	2909.19.6000	Tetraethyleneglycol Dimethyl Ether	143-24-8	Ethers of polyhydric alcohols and their halogenated, sulfonated, nitrated or nitrosated derivatives, nesoi.	EU	SOCMA member relies on the Chinese material as an offset to another product to remain cost competitive in the U.S.
127	2909.30.30			Pesticides, of aromatic ethers and their halogenated, sulfonated, nitrated or nitrosated derivatives		
128	2909.30.4000	FLUOROANISOLE, 2-			Limited	
129	2909.44.0150	2-Mercaptoethanol	60-24-2		None	
130	2909.49.6000	DIPENTAERYTHRITOL			Limited	
131	2909.50.5000	METHOXY-4-VINYLPHENOL, 2-			Limited	
132	2909.60.2000	Cumene hydroperoxide	80-15-9	Peroxide	EU	The U.S. market has never had a producer of this material. EU does however and have begun to build facilities around the world and will monopolize the

						market place. This Chinese source that is critical to SOCMA member's organization as well as to the U.S economy. Chinese product has helped keep cost down and equalized the market, preventing it to succumbing monopolization by the EU producer.
133	2910.50.0000	BUTYL GLYCIDYL ETHER, N-			Limited	
134	2910.90.91	Allylglycidyl Ether	106-92-3	Raw material for contact lens monomer	Japan	Used for a large volume water treatment product sold to China. The proposed tariff will make SOCMA member non-competitive with Chinese manufacturers.
135	2910.90.9100	ALKYL (C12-14) GLYCIDYL ETHER			Limited	
136	2910.90.9100	Alkyl C12-C14 Glycidyl Ether	68609-97-2		U.S.	
137	2911.00.5000	Acetal			Limited	
138	2912.12.0000	ACETALDEHYDE			Limited	
139	2912.19.2000	Citronellal			Limited	
140	2912.19.2500	BUTYRALDEHYDE			Limited	
141	2912.21.0000	2,3,5 Trichlorobenzaldehyde	56961-75-2	Photoinitiator precursor	Unknown	Not available domestically
142	2912.29.6000	2,3,5 Trichlorobenzaldehyde	56961-75-2	SOCMA member is sole commercial supplier in the	None known to SOCMA member	Application: used as an intermediate for advanced

				world and sold exclusively in the U.S.		printed circuit board manufacturing in the U.S.
143	2912.41.0000	VANILLIN			Limited	
144	2912.49.2600	HYDROXYBENZALDEHYDE, 3-			Limited	
145	2913.00.4000	BENZALDEHYDE 2 SULFONIC ACID			Limited	
146	2913.00.4000	CHLOROBENZALDEHYDE, O-			Limited	
147	2913.00.4000	Benzaldehyde-2-Sulfonic Acid	1008-72-6		None	There has never been a U.S. producer. This is a critical piece of business for SOCMA member and raw material for SOCMA member's end users.
148	2913.00.5000	ALDEHYDE SULFONIC ACID	56405-41-5	SOCMA member custom manufactures this product solely for U.S. customer.	None	Application: dye intermediate used in the paper industry.
149	2913.00.5000	4-Formylbenzene-1,3-Disulfonic Acid	Mixture		None	There has never been a U.S. producer. This is a critical piece of business for SOCMA member and raw material for SOCMA member's end users.
150	2914.19.00	Ketone		SOCMA member imports the ketone from China used as a raw material in the production of a specialty curing agent for the U.S. coatings industry.	Ketone is only produced in China so SOCMA member has no other sourcing options.	
151	2914.19.00	2,2,6,6-tetramethyl-3,5-heptanedione	1118-71-4		Qualified source(s) are Chinese only	
152	2914.19.00	5-hexene-2-one	109-49-9		Qualified source(s) are Chinese only	

	2914.19.0000	OCTANEDIONE, 3,6-			Limited	
153	2914.19.0000	Acetyl Acetone	123-54-6	Ketone	Japan & Germany, but limited supply; no U.S. producer.	The Japanese and German material cannot support the entire global market alone as well as the Chinese keep their pricing competitive.
154	2914.29.3100	CAMPHOR FLAKES USP			Limited	
155	2914.29.5000	METHYL CEDRYL KETONE			Limited	
156	2914.29.5000	4-MTD	12/2/3274	SOCMA member is sole commercial supplier in the world and sold exclusively in the U.S.	None known to SOCMA member	Application: used as an intermediate for advanced printed circuit board manufacturing in the U.S.
157	2914.39.9000	Benzil	134-81-6	Photoinitiator/Photoinitiator precursor	Unknown	Not available domestically
158	2914.39.9000	BENZOPHENONE			Limited	
159	2914.39.9000	Benzil	134-81-6	SOCMA member is only commercial supplier in the world and sold exclusively in the U.S.	None known to SOCMA member	Application: used as an intermediate for advanced printed circuit board manufacturing in the U.S.
160	2914.40.40	Hydroxybenzophenone	1137-42-4	Raw material for specialty monomer	None known	
161	2914.40.9000	ACETOIN (DIMER) POWDER NATURAL			Limited	
162	2914.40.9000	Benzoin	119-53-9	Aldehyde	South Korea, but limited supply. No U.S. producers.	This is a key raw material for industrial coatings that are found in infrastructure and food packaging.
163	2914.49.1000	Escalol 577			There are limited suppliers of UV filters located in	The suppliers in India do not meet quality and safety standards. The

					India, Europe and U.S.	European and U.S. suppliers offer a limited supply and are over market value price.
164	2914.50.30	4, 4'-Dihydroxybenzophenone	611-99-4	Raw material for contact lens monomer	None known to SOCMA member	
165	2914.50.30	2,4-Dihydroxybenzophenone	131-56-6	Raw material for contact lens monomer	U.S.	
166	2914.50.3000	TETRAHYDROXYBENZOPHENONE, 2,2'			Limited	
167	2914.50.3000	Escalol 517			There are limited suppliers of UV filters located in India, Europe and U.S.	The suppliers in India do not meet quality and safety standards. The European and US suppliers offer a limited supply and are over market value price.
168	2914.50.3000	Escalol 567			There are limited suppliers of UV filters located in India, Europe and U.S.	The suppliers in India do not meet quality and safety standards. The European and US suppliers offer a limited supply and are over market value price.
169	2914.50.5000	Benzil Dimethylketal	24650-42-8	SOCMA member is only commercial supplier in the world and sold to SOCMA member's most important customer in the U.S., and this is also very important product for SOCMA member's U.S. customer.	None known to SOCMA member	Application: used as an intermediate for advanced printed circuit board manufacturing in the U.S.

170	2914.61.0000	Anthraquinone-2-Sulfonic Acid	131-08-8		None known to SOCMA member	There has never been a U.S. producer. This is a critical piece of business for SOCMA member and raw material for SOCMA member's end users.
171	2914.69.6000	Quinizarin	81-64-1	1,4-Dihydroxyanthraquinone		Quinizarin is a raw material used to make colored dyes for the US Army to use in signaling grenades. The predominant worldwide supplier is located in China. An increase in price on raw materials will be passed directly on to the U.S. government and they will bear the burden of the 10-25% tariff.
172	2914.69.6000	1,4-dihydroxyanthraquinone	81-64-1		None known to SOCMA member	There has never been a U.S. producer. This is a critical piece of business for SOCMA member and raw material for SOCMA member's end users.
173	2914.69.9000	IDEBENONE			Limited	
174	2914.69.9000	Leucoquinizarin	476-60-8	Leucoquinizarin as 1,4,9,10-tetrahydroxyanthracene (CAS No. 476-60-8), 2,3-dihydro-9,10-dihydroxyanthracene-1,4-dione (CAS No. 17648-03-2) or 2,3-dihydro-1,4-		Leucoquinizarin is a raw material used to make colored dyes for the U.S. Army to use in the M-18 grenades. The only worldwide supplier is located in China. An increase in price

				dihydroxy-9,10-anthracenedione (CAS No. 40498-13-3) (provided for in subheading 2907.29.90 or 2914.69.90)		on raw materials will be passed directly on to the U.S. government and they will bear the burden of the 10-25% tariff.
175	2914.69.9000	Leucoquinizarin	476-60-8		None known to SOCMA member	There has never been a U.S. producer. This is a critical piece of business for SOCMA member and raw material for SOCMA member's end users.
176	2914.79.4000	CHLORANIL, P-			Limited	
177	2914.79.4000	Nitroanthraquinone	82-34-8	1-Nitroanthraquinone (1-nitroanthracene-9,10-dione)		Nitroanthraquinone is a raw material used to make colored dyes for the US Army to use in signaling grenades. It is only available from China. An increase in price on raw materials will be passed directly on to the U.S. government and they will bear the burden of the 10-25% tariff.
178	2914.79.9000	Chalcone Dibromide	611-91-6	Photoinitiator	Unknown	Not available domestically
179	2914.79.9000	Chalcone Dibromide	611-91-6	SOCMA member is sole commercial supplier in the world and sold to SOCMA member's most important customer in the U.S.	None known to SOCMA member	Application: used as an intermediate for advanced printed circuit board manufacturing in the U.S.
180	2915.31.0000	PHENOTHIAZINE 7% IN			Limited	

181	2915.39.10	Butyl Acetate	123-86-4		None known to SOCMA member	Increases product cost and cost to agriculture.
182	2915.39.10	Acetic acid, phenylmethyl ester	140-11-4	Benzyl Acetate	England – sufficient volumes unknown and not expected.	According to the EPA, between 1 and 10 million pounds were consumed in the U.S. in 2015. Based on EPA data, the estimate for U.S. jobs affected will be between 2,000 and 10,000
183	2915.39.1000	BENZYL ACETATE			Limited	
184	2915.39.4000	LINALYL ACETATE			Limited	
185	2915.39.4550	ETHOXYPROPYL ACETATE			Limited	
186	2915.39.4700	Triacetin F			Limited	
187	2915.39.7000	ISOBUTYL ACETATE			Limited	
188	2915.39.9000	BUTYL ACETATE, TERT-			Limited	
189	2915.39.9000	tert-Butyl Acetate	540-88-5		U.S.	
190	2915.50.2000	ETHYL 3-METHYLTHIOPROPIONATE			Limited	
191	2915.50.5000	ETHYL PROPIONATE			Limited	
192	2915.60.5000	ALLYL CAPROATE, SYNTHETIC			Limited	
193	2915.70.0120	STEARIC ACID, NF			Limited	
194	2915.70.0150	DiBasic Acid blend [Padcorn 1250]	72162-23-3		None	There has never been a U.S. producer. This is a critical piece of business for SOCMA member and raw material for SOCMA member's end users.
195	2915.90.1010	Lauric Acid			Limited	
196	2915.90.1050	CETYL MYRISTOLEATE 11%			Limited	
197	2915.90.1800	ETHYL 8-BROMOOCTANOATE			Limited	Pharma use

198	2915.90.5010	MYRISTOYL CHLORIDE			Limited	
199	2915.90.5050	ALLYL HEXANOATE NATURAL			Limited	
200	2916.11.0000	GLACIAL ACRYLIC ACID			Limited	
201	2916.12.5040	ETHYL HEXYL ACRYLATE, 2-			Limited	
202	2916.14.2050	DIMETHYLAMINOETHYL METHACRYL			Limited	
203	2916.15.5100	ETHYL OLEATE USP/NF			Limited	
204	2916.19.2000	Sorbic Acid	110-44-1		U.S. and EU	
205	2916.19.5000	DECENOIC ACID, 5(6)-			Limited	
206	2916.20.5000	Tretinoin			Limited	
207	2916.31.1170	Sodium Benzoate	532-32-1		EU	
208	2916.31.1190	BUTYLBENZOIC ACID,4-TERT-			Limited	
209	2916.31.3000	BENZYL BENZOATE			Limited	
210	2916.32.2000	BENZOYL CHLORIDE			Limited	
211	2916.39.1700	m-Toluic Acid	99-04-7		None	
212	2916.39.2100	ETHYL CINNAMATE			Limited	
213	2916.39.7900	ETHYL TRIPHENYL PHOSPHONIUM			Limited	
214	2917.11.0000	BROMOCYCLOBUTENE PHENYLACETIC			Limited	
215	2917.12.5000	TRIAZINE-2,4,6-TRIAMINE,ETHANE			Limited	
216	2917.14.5000	DIMETHYL ADIPATE			Limited	
217	2917.19.2000	MALEIC ANHYDRIDE			Limited	
218	2917.19.2700	GLUTARIC ACID			Limited	
219	2917.19.3500	DIETHYL MALEATE			Limited	
220	2917.19.7050	Malonic Acid			Limited	
221	2917.19.7050	Diethyl Malonate 99.5%	105-53-3	Ester	None	SOCMA member supplies to a critical customer that consumes this item that

						supports the U.S. automotive industry. Without, customer cannot produce the material that is necessary for supporting the entire U.S. automotive industry.
222	2917.19.7050	Itaconic Acid	97-65-4		None	U.S. producer exited in 2007 because of lower demand so the Chinese filled that void where there was still demand. Critical in the production of carbon fibers for aerospace.
223	2917.39.7000	DIMETHYL MALONATE			Limited	
224	2918.11.1000	TETRA CHLOROPHTHALIC ANHYDRIDE			Limited	
225	2918.11.5100	LACTIC ACID 60%			Limited	
226	2918.15.1000	BUTYL BUTYRYLLACTATE			Limited	
227	2918.15.5000	MONOSODIUM CITRATE			Limited	
228	2918.19.31	2,6-Dimethoxybenzoic acid	1466-76-8	Raw material for contact lens monomer	None known to SOCMA member	
229	2918.19.90	Nonaromatic carboxylic acids with alcohol function, without other oxygen function, and their derivatives, nesoi	6289-46-9	DMSS	U.S./Europe	
230	2918.19.90	trans-4-Pentylcyclohexanecarboxylic Acid	38289-29-1	Raw material for contact lens monomer	None known to SOCMA member	
231	2918.19.9000	TRIETHYL CITRATE NATURAL			Limited	
232	2918.19.9000	DMBA	10097-02-6	SOCMA member is only supplier of this product in	None known to SOCMA member	

				the world. Extreme world shortage of this product that is a key ingredient to make low VOC water-based coatings in the US.		
233	2918.21.1000	BUTYL BUTYRYLLACTATE NATURAL			Limited	
234	2918.21.5000	SALICYLIC ACID			Limited	
235	2918.23.2000	SODIUM SALICYLATE USP			Limited	
236	2918.23.5000	Escalol 587			There are limited suppliers of UV filters located in India, Europe and U.S.	The suppliers in India do not meet quality and safety standards. The European and US suppliers offer a limited supply and are over market value price.
237	2918.23.5000	Escalol HMS			There are limited suppliers of UV filters located in India, Europe and U.S.	The suppliers in India do not meet quality and safety standards. The European and US suppliers offer a limited supply and are over market value price.
238	2918.23.5000	Escalol HMS LO			There are limited suppliers of UV filters located in India, Europe and U.S.	The suppliers in India do not meet quality and safety standards. The European and US suppliers offer a limited supply and are over market value price.
239	2918.23.5000	Salicylic Acid USP	69-72-7		None	
240	2918.29.0400	METHYL SALICYLATE			Limited	

241	2918.29.25	3-Hydroxy-2-naphthoic acid-- BONA		BONA	None	
242	2918.29.6500	SULFOSALICYLIC ACID			Limited	
243	2918.29.7500	DINITROSALICYLIC ACID, 3,5-			Limited	
244	2918.30.90	Non-aromatic carboxylic acids w/aldehyde or ketone function but w/o other oxygen func. their anhydrides, halides, peroxides, etc. derivatives.	6289-46-9	DMS	U.S./Europe	
245	2918.30.9000	DIHYDROXYBENZOIC ACID, 2,4-			Limited	
246	2918.99.4300	Escalol 557			There are limited suppliers of UV filters located in India, Europe and U.S.	The suppliers in India do not meet quality and safety standards. The European and US suppliers offer a limited supply and are over market value price.
247	2918.99.5000	ALPHA KETOGLUTARIC ACID			Limited	
248	2919.90.5050	ETHYL 3-ETHOXYPROPIONATE			Limited	
249	2920.90.2000	TRICHLORO ETHYL PHOSPHATE			Limited	
250	2920.90.5100	DIPHENYL CHLOROPHOSPHATE			Limited	
251	2921.19.1100	PROPYLENE CARBONATE			Limited	
252	2921.19.6190	TRIETHYLAMINE			Limited	
253	2921.19.9011	Triethylamine	121-44-8	SOCMA member is sole supplier of this product which is in extreme world shortage. SOCMA member's U.S. customers desperately need continuous supply of this material.		Increase in duty on this product will undoubtedly raise prices to U.S. consumers in general as this is used in manufacturing across the board.

254	2921.30.3000	Menthane Diamine	80-52-4	Inhibitor precursor	None known to SOCMA member	Single global supplier is in China. Other producers only willing to make material at exorbitant prices and volumes.
255	2921.30.3000	Menthane Diamine	80-52-4	SOCMA member is only commercial supplier in the world and sold to SOCMA member's most important customer in the U.S.	None known to SOCMA member	
256	2921.30.5	2-methylcyclohexylamine	7003-32-9		Qualified source(s) are Chinese only	
257	2921.30.5000	Dicyclohexylamine	101-83-7	Amine	EU	The U.S. market place cannot be supported by just the EU producer as the global demand outstrips the total production of what the EU can produce, so the Chinese are filling the gap on this item that is critical in the manufacturing of gear oils used by every piece of machinery in the world.
258	2921.41.1000	Aniline	62-53-3	Aniline	Domestic	This is very important to multiple SOCMA members. Almost all domestic supply of aniline is dedicated to MDI production. For non-MDI requirements, manufacturers have to import much of their

					<p>supply from China. Aniline is a raw material used in PANA, which is an antioxidant used in jet engine lubrication systems. Every commercial and military plane in the U.S. requires this additive. If raw materials are not available, or too expensive to make the PANA profitably, the lubricant companies supplying the U.S. Armed Forces will be required to import the PANA from China, and US manufacturing will lose jobs. SOCMA member uses large amounts of aniline to manufacturer sulfanilic acid. SOCMA member is the most significant supplier of this material in the world. Sulfanilic acid is used to make food dyes, concrete additives, optical brighteners for paper, and pharmaceuticals. 11 full time operators would lose their employment if SOCMA member cannot source aniline at a</p>
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						reasonable cost. Moreover, this situation most likely would cause a manufacturer to go out of business after 40 years of operations.
259	2921.42.0090	D89 Nitroso	120-22-9	SOCMA member is only supplier in the world for this product and custom manufactured for U.S. fortune 500 customer.	None known to SOCMA member	Application: commercial photo printing.
260	2921.42.0090	D-91Q Nitroso	1442637-04-8	SOCMA member is only supplier in the world for this product and custom manufactured for US fortune 500 customer.	None known to SOCMA member	Application: commercial photo printing.
261	2921.42.55	Fast color bases of aniline derivatives and their salts				
262	2921.42.6500	Taurine USP			Limited	
263	2921.42.90	Other aniline derivatives and their salts				
264	2921.42.9000	BROMO-2-CHLOROANILINE, 5-			Limited	Pharma use
265	2921.42.9000	6-bromo-2,4-dinitroaniline	1817-73-8		None known to SOCMA member	There has never been a U.S. producer. This is a critical piece of business for SOCMA member and raw material for SOCMA member's end users.
266	2921.43.0800	FLUORO-2-METHOXY-5-NITROANILIN			Limited	

267	2921.43.40	Toluidines and their derivatives; salts thereof; described in additional U.S. note 3 to section VI				
268	2921.43.90	Other toluidines and their derivatives; and salts thereof, nesoi				
269	2921.49.10	4-Amino-2-stilbenesulfonic acid and its salts, p-ethylaniline; 2,4,6-trimethylaniline (Mesidine); and specified xylidines				
270	2921.49.1000	Dibenzylamine	103-49-1		None known to SOCMA member	
271	2921.49.5000	Alpha Phenylethylamine	618-36-0	Alpha Phenylethylamine 99% is a flammable and corrosive liquid. Also known as phenylethylamine is a monoamine compound whose individual enantiomers of this basic compound are useful for performing chiral resolution of acidic compounds.	None known to SOCMA member	AMB is a critical component in a specialty lubricant additive. The AMB is not available anywhere but China. In fact, it was approved as sole source under the MTB legislation. If the tariff is implemented, SOCMA member's customer will not be competitive on their final product. It is USA production. Jobs will be lost or the project will move off shore.
272	2921.51.1000	M-Phenylenediamine	108-45-2	Used as inhibitor in polymer production.	None known to SOCMA member	
273	2921.51.2000	PHENYLENEDIAMINE, 1,2-			Limited	
274	2921.51.2000	COLOR DEVELOPER 4			Limited	
275	2921.51.3000	N, N-Diethyl-p-Phenylenediamine Sulfate	6283-63-2	White crystalline powder used in water treatment.	None known to SOCMA member	

276	2921.59.2000	Disulfonic Acid / DAST	81-11-8	4,4'-Diamino-2,2'-stilbenedisulfonic acid	India	DAST is a raw material used in optical brighteners to whiten paper. This business is already fiercely competitive with imports, and by increasing raw material cost it will give the international countries a further advantage. Supply from India cannot keep up with U.S. demand. Imports from China are required.
277	2921.59.80	Aromatic polyamines and their derivatives; salts thereof nesoi	612-83-9	DCB	India	
278	2922.29.06	m-Nitro-p-anisidine and m-nitro-o-anisidine as fast color bases	Multiple	Fast Bases	India	
279	2922.29.6100	BIS-[4-(3-AMINOPHENOXY)BENZENE			Limited	
280	2922.29.8190	GLUTAMIC ACID HCL, L-			Limited	
281	2922.39.1000	P-Dimethylaminobenzaldehyde	100-10-7		None known to SOCMA member	There has never been a U.S. producer. This is a critical piece of business for SOCMA member and raw material for SOCMA member's end users.
282	2922.42.5000	AMINO BENZOIC ACID, P-			Limited	
283	2922.49.1000	PHENYLALANINE, DL-			Limited	
284	2922.49.3000	ALANINE, B-			Limited	
285	2922.49.3700	Escalol 507			There are limited suppliers of UV filters located in	The suppliers in India do not meet quality and safety standards. The

					India, Europe and US	European and US suppliers offer a limited supply and are over market value price.
286	2922.49.4910	ASPARTIC ACID, L-			Limited	
287	2922.49.4950	n-Phenylglycine	103-01-5	Co-initiator	U.S.	Domestic material is 100% more expensive than Chinese equivalent.
288	2922.49.4950	ASPARTIC ACID, DL-			Limited	
289	2922.49.4950	N-Phenyl Glycine	500-98-1	SOCMA member is sole commercial supplier and sold to SOCMA member's most important customer in the U.S.	None	Application: used as an intermediate for advanced printed circuit board manufacturing in the U.S.
290	2922.49.8000	S-Diphenylprolinol	112068-01-6		Korea	Korean material is 5x cost.
291	2922.49.8000	CHOLINE DIHYDROGEN CITRATE			Limited	
292	2922.49.8000	EDTA-Na4	194491-31-1	Ethylenediaminetetraacetic acid, tetrasodium salt hydrate		EDTA is a raw material used in optical brighteners to whiten paper. This raw material is only available from China. This business is already fiercely competitive with imports, and by increasing raw material cost it will give the international countries a further advantage.
293	2923.10.0000	BENZETHONIUM CHLORIDE USP			Limited	
294	2923.90.0100	ACETYL-L-GLUTAMINE, N-			Limited	
295	2924.19.1150	BOC-DIETHANOLAMINE, N-			Limited	Supplement use

296	2924.19.1150	Propargyl Butylcarbamate, aka 2-Propynyl Butylcarbamate, aka PBC	76114-73-3	Starting material for IPBC a product that is a biocide to prevent mold/mildew growth, also serves as a preservative. Serves: Paints, Coatings, metal working fluids, adhesives, inks, wood and paper products preservative and mildewcide, cosmetics, personal care products.	One known U.S source to SOCMA member's knowledge and source cannot supply the total demand of the industry.	U.S. supply not cost competitive. U.S. supply cannot meet total market demand. Only one known U.S. supply and could leave manufacturers singly sourced, putting suppliers and end users at risk. As a small business, limited supply or increased raw material costs due to an increase in tariff from 3.7% to 13.7 (or more)% will likely cause adverse effects that larger companies might be able to absorb. Wide variety of applications where increases in raw material costs (from 10-25% tariff increase) will be passed eventually on to U.S. consumers of paints, personal care products and others.
297	2924.19.8000	ACETYSULFANILYL CHLORIDE, N-			Limited	
298	2924.19.8000	Boc-L-Alanine	15761-38-3	Acyclic amide derivatives; salts thereof; nesoi.	Indian, Japan	China is a good mix between quality material and cost efficiency. Japanese amino acid producers of the highest quality have very

						high pricing. Indian material sometimes does not meet quality standards in the U.S. and is on par with Chinese pricing.
299	2924.29.1000	ANTHRANILAMIDE			Limited	
300	2924.29.20	2-Acetamido-3-chloroanthraquinone; o-acetoacetamide; o-acetoacetotoluidide; 2,4-acetoacetoxylidide; and 1-amino-5-benzamidoanthraquinone		AAOA		
301	2924.29.71	Aromatic cyclic amides and their derivatives of products described in additional U.S. note 3 to section VI, nesoi				
302	2924.29.77	Aromatic cyclic amides (incl cyclic carbamates) and their derivatives and salts thereof,	4433-79-8	NAPTHOL AS IRG	India	
303	2924.29.7790	DICYCLOHEXYLCARBODIIMIDE,N,N'-			Limited	
304	2924.29.9500	N-Methylformamide	123-39-7		EU	
305	2925.19.91	Other non-aromatic imides and their derivatives		N BROMOSUCCINIMIDE:		
306	2925.19.91	N-N-dicyclohexylcarbodiimide	538-75-0	Raw material for contact lens monomer	None known to SOCMA member	
307	2925.19.9100	AMINOGUANIDINE BICARBONATE			Limited	Supplement use
308	2925.19.9100	N,N'-m-Phenylenedimaleimide	3006-93-7	SOCMA member is exclusive supplier for U.S. fortune 500 polymer company. This company also must use SOCMA member's material	None known to SOCMA member	

					for internal reasons, and customer will likely pass on the increase to consumer if price is raised on this product.		
309	2925.29.9000	DICYANDIAMIDE				Limited	
310	2926.20.0000	MALONONITRILE				Limited	
311	2926.90.43	Aromatic nitrile-function compounds, nesoi, described in additional U.S. note 3 to section VI					
312	2926.90.4801	Escalol 597				There are limited suppliers of UV filters located in India, Europe and U.S.	The suppliers in India do not meet quality and safety standards. The European and US suppliers offer a limited supply and are over market value price.
313	2926.90.5010	Acetonitrile				Limited	Pharma use
314	2926.90.5050	DIAZO CMI-18				Limited	
315	2926.90.5050	Butyl Cyanoacetate	5459-58-5	Ester		None known to SOCMA member	Key raw material for many U.S. customers. Without it, customers cannot produce end products used by the U.S. consumer.
316	2926.90.5050	Benzyl Cyanide	140-29-4			EU	
317	2926.90.5050	Ethyl Cyanoacetate	105-56-6			None known to SOCMA member	There is no U.S. producer and it is a key raw material for many U.S. customers. Without it, customers cannot produce their end

						products which is used by the U.S. consumer.
318	2926.90.5050	Acetonitrile	75-05-8		U.S.	
319	2928.00.1500	PHENYLHYDRAZINE			Limited	
320	2928.00.2500	DIETHYLHYDROXYLAMINE, N,N			Limited	
321	2928.00.50	Nonaromatic organic derivatives of hydrazine or of hydroxylamine, nesoi				
322	2928.00.5000	ADIPIIC DIHYDRAZIDE			Limited	
323	2929.90.1500	DIPHENYLPHOSPHORYL AZIDE			Limited	
324	2930.40.0000	METHIONINE, DL-			Limited	
325	2930.90.2600	THIOCARBANALIDE			Limited	
326	2930.90.2900	THIOSALICYLIC ACID, 44 Thio bis			Limited	
327	2930.90.2900	Bisphenol S	80-90-1		None known to SOCMA member	
328	2930.90.3000	AMMONIUM THIOCYANATE PURE			Limited	
329	2930.90.4920	3-Mercaptopropionic Acid 80%	107-96-0		EU; no U.S. producers.	EU producer exited the market because of low demand. The U.S. market needs replacement material.
330	2930.90.4950	CYSTEINE, L			Limited	
331	2930.90.7100	DIBUTYLTHIOUREA, N,N-			Limited	
332	2930.90.9190	ALLYL DISULPHIDE			Limited	
333	2931.39.0018	ETHYL-1-NAPHTHYLAMINE,N-			Limited	
334	2931.90.00	Naphthylboronic Acid	13922-41-3		Qualified source(s) are Chinese only	
335	2931.90.3000	RACEMIC-1-HYDROXY-1-OXO-2,5-			Limited	

336	2931.90.3000	Photo-Initiator TPO Solid	75980-60-8		None known to SOCMA member	
337	2931.90.6000	CHLOROTRIMETHYLSILANE			Limited	
338	2931.90.90	ZIRCONIUM ACETYL ACETONATE	17501-44-9	Raw material for specialty monomer	U.S.	U.S. supply is at a substantially higher price.
339	2931.90.9010	DIBUTYLTIN DILAURATE			Limited	
340	2931.90.9029	CYANO-3-FLOUROPHENYLBORONIC			Limited	Pharma use
341	2931.90.9029	Micropulvarized TPT	595-90-4	Custom produced only for SOCMA member's customer. SOCMA member is only one in the world making this specification because only SOCMA member's customer require product in this specification.	None known to SOCMA member	
342	2931.90.9051	TETRAHYDROFURAN			Limited	
343	2931.90.9051	BPA	1779-48-2	SOCMA member is sole supplier of this product which is in extreme world shortage. SOCMA member's U.S. customers desperately need continuous supply of this material.	None known to SOCMA member	
344	2931.90.9051	BPOD	824-72-6	SOCMA member is sole supplier of this product which is in extreme world shortage. SOCMA member's U.S. customers desperately need continuous supply of this material.	None known to SOCMA member	

345	2931.90.9051	SBP	4297-95-4	SOCMA member is sole supplier of this product which is in extreme world shortage. SOCMA member's U.S. customers desperately need continuous supply of this material.	None known to SOCMA member	
346	2931.90.9051	4-Nitrobenzenesulfonyl Chloride	98-74-8		None known to SOCMA member	
347	2932.11.0000	Furfural			Limited	
348	2932.12.0000	AMBRETTOLIDE			Limited	
349	2932.19.1000	ACETOXY DIMETHYL FURANONE			Limited	
350	2932.19.5100	GLUCOSAMINE HCL 80 MESH POWDER			Limited	
351	2932.19.5100	Sucralose	56038-13-2		U.S.	
352	2932.99.9010	ACETYL-L-CYSTEINE, N-			Limited	
353	2932.99.9090	PHENYL-1H-PYRAZOLE-4-CARBOXALD			Limited	
354	2932.99.9090	3,4-dihydro-2H-pyran	110-87-2		Qualified source(s) are Chinese only	
355	2933.19.4300	DIMETHYLHYDANTOIN, 5,5-			Limited	
356	2933.21.0000	CL-HABI, O-			Limited	
357	2933.21.0000	5,5-Dimethylhydantoin	77-71-4		EU	
358	2933.29.4300	IMIDAZOLE ACS			Limited	
359	2933.29.4500	PHENYL-5-BENZIMIDAZOLE			Limited	
360	2933.29.6000	METHIMAZOLE USP			Limited	
361	2933.29.9000	BCIM	7189-82-4	Photoinitiator	U.S.	Without significant capital and time investment, domestic material is 10x

						more expensive than Chinese equivalent.
362	2933.29.9000	TCDM	100486-97-3	Photoinitiator	U.S.	Without significant capital and time investment, domestic material is 10x more expensive than Chinese equivalent.
363	2933.29.9000	MERCAPTOPYRIDINE, 2-			Limited	
364	2933.29.9000	2-Ethoxy Habi	29864-18-4	SOCMA member is only commercial supplier in the world and sold exclusively in the U.S.	None known to SOCMA member	Application: used as an intermediate for advanced printed circuit board manufacturing in the U.S.
365	2933.29.9000	2-Methoxy HABI	29864-15-1	SOCMA member is sole commercial supplier in the world and sold exclusively in the U.S.	None known to SOCMA member	Application: used as an intermediate for advanced printed circuit board manufacturing in the U.S.
366	2933.29.9000	BCIM	7189-82-4	Production only in China and SOCMA member sells exclusively in the U.S.	None known to SOCMA member	Application: used as an intermediate for advanced printed circuit board manufacturing in the U.S.
367	2933.29.9000	TCDM	100486-97-3	SOCMA member is sole commercial supplier in the world and sold to SOCMA member's most important customer in the U.S.	None known to SOCMA member	
368	2933.31.0000	METHYL-5-THIAZOLEETHANOL, 4-			Limited	
369	2933.69.6010	Cyanuric Chloride	108-77-0	Cyanuric chloride (2,4,6-trichloro-1,3,5-triazine)		Cyanuric Chloride is a raw material used in optical brighteners to whiten paper. The predominant worldwide supplier is located in China. This

						business is already fiercely competitive with imports that do not have duties on their raw materials, and by increasing raw material cost it will give the international countries a further advantage.
370	2933.99.0600	4-hydroxy tempo				
371	2933.99.7900	R-Diphenylprolinol	22348-32-9		Korea	Korean material is 3x cost.
372	2934.10.2000	ACETYLTHIAZOLE, 2-			Limited	
373	2934.10.9000	MERCAPTOBENZOTHIAZOLE, 2- PD			Limited	
374	2934.20.1500	Dye B-S			Limited	
375	2934.20.35			Pesticides containing a benzothiazole ring-system, not further fused.		
376	2934.20.4000	Benzothiazol-2-ylthio Succinic Acid	95154-01-1		None known to SOCMA member	
377	2934.20.8000	BETA-D-RIBOFURANOSE 1,2,3,5-			Limited	Pharma use
378	2934.20.8000	2-Amino-4-methylbenzothiazole	1477-42-5		None known to SOCMA member	There has never been a U.S. producer. This is a critical piece of business for SOCMA member and raw material for SOCMA member's end users.
379	2940.00.6000	POTASSIUM CHLORIDE USP			Limited	
380	2942.00.50	Bis(trimethylsiloxy)methylsilane	1873-88-7	Raw material for contact lens monomer	U.S.	
381	2942.00.5000	Boron Trifluoride Ethylamine Complex	75-23-0		U.S.	

382	2942.00.5000	Natural O-Cresol	95-48-7		U.S. and EU	
383	2992.49.90	3-methyl benzoic acid		SOCMA member is only commercial supplier in the world and sold to SOCMA member's most important customer in the U.S., and this is also very important product for SOCMA member's U.S. customer.	None known to SOCMA member	Application: used as an intermediate for advanced printed circuit board manufacturing in the U.S.
384	3040.60.00	Dicyclohexylamine	101-83-7	SOCMA member is sole supplier of this product which is in extreme world shortage. SOCMA member's U.S. customers desperately need continuous supply of this material.	None known to SOCMA member	Increase in duty on this product will undoubtedly raise prices to U.S. consumers in general as this is used in manufacturing across the board.
385	3103.11.00	>35% P2O5	1314-56-3	N/A	India, not enough	This covers P2O5
386	3104.20.0000	LYCOPENE 10% BEADLET			Limited	Supplement use
387	3203.00.8000	VIOLANTHRONE 79			Limited	
388	3204.11.50	Disperse dyes and preparations based thereon, nesoi	Multiple			
389	3204.12.45	Acid dyes, whether or not premetallized, and preparations based thereon, described in additional U.S. note 3 to section VI				
390	3204.12.50	Synthetic acid and mordant dyes and preparations based thereon, nesoi				
391	3204.13.60	Basic dyes and preparations based thereon, described in additional U.S. note 3 to section VI				

392	3204.13.80	Basic dyes and preparations based thereon, nesoi				
393	3204.14.5000	TOLUIDINE RED AC 1038			Limited	
394	3204.15.20	Vat brown 3; vat orange 2, 7; and vat violet 9, 13 dyes and preparations based thereon	Multiple			
395	3204.15.40	Vat dyes (incl. those usable as pigments) and preparations based thereon, described in additional U.S. note 3 to sec. VI	81-77-6	Vat Blue 4	None known to SOCMA member	
396	3204.15.80	Vat dyes (including those usable in that state as pigments) and preparations based thereon, nesoi				
397	3204.17.04	Pigments and preparations based thereon, pigment black 1, and other specified pigments, nesoi	Multiple	PR 144		
398	3204.17.20	Copper phthalocyanine ([Phthalocyanato(2-)]copper) Blue Crude	147-14-8/68987-63-3	Blue Crude	India, Indonesia, South Korea	
399	3204.17.60	Pigments and preparations based thereon, products described in additional U.S. note 3 to section VI, nesoi	Multiple			
400	3204.17.90	Other pigments and preparations based thereon, nesoi	Multiple			
401	3204.17.9086	Sudan Black 3			Limited	
402	3204.19.1100	RHODAMINE B BASE			Limited	
403	3204.19.2595	BETA CAROTENE 20% GELATIN			Limited	
404	3204.19.3500	THIOPHENEDIYL)BIS(5-TERT-			Limited	
405	3204.19.50	Synthetic organic coloring matter and preparations based thereon				

		nesoi, including mixtures of items from subheading 320411 to 320419				
406	3204.20.8000	BEI ORANGE 240			Limited	
407	3204.90.00	Synthetic organic coloring matter or preparations based thereon, nesoi; synthetic organic products used as luminophores				
408	3204.90.0000	EVENING PRIMROSE OIL			Limited	Cosmetic use
409	3206.11.00	Pigments & preparations based on titanium dioxide containing 80 percent or more by weight off titanium dioxide calculated on the dry weight	Multiple	TiO2		
410	3206.49.60	Coloring matter and preparations, nesoi, as specified in note 3 to this chapter 32	Multiple	Pearl/ Effect Pigments	U.S./South Korea	Not enough capacity to cover world's consumption
411	3212.90.00	Pigments dispersed in nonaqueous media, in liquid or paste form, used in making paints; dyes & coloring matter packaged for retail sale	Multiple	Aluminum Pigments		
412	3302.90.1050	MAGNESIUM ASCORBYL PHOSPHATE			Limited	
413	3304.99.5000	TRIS(DIMETHYLAMINOMETHYL)			Limited	
414	3402.12.5000	BTMS 7550KC			Limited	
415	3402.13.2020	METHYL GLUCETH DOE120KC			Limited	
416	3402.13.5000	ALKYLPOLYGLUCOSIDE 08/10			Limited	
417	3402.13.5000	DDTM-PG surfactant		SOCMA member is sole supplier of this product which is in extreme world shortage. SOCMA member's U.S. customers desperately		

				need continuous supply of this material.		
418	3507.90.7000	BETA GLUCAN 2%			Limited	
419	3806.10.0010	FLORAREZ DR95			Limited	
420	3806.30.0000	Hercolyn D			Limited	
421	3808.59.50			Pesticides, nesoi specified in note 1 to chapter 38		
422	3808.62.50			Pesticides, >7.5kg nesoi specified in note 2 to chapter 38		
423	3812.39.90	Bis(2,2,6,6-tetramethylpiperdine-l-oxy)-sebacate	2516-92-9	Raw material for specialty monomer	None known to SOCMA member	
424	3815.90.5000	MH-68	54553-90-1	SOCMA member is exclusive supplier for #1 U.S. paint company. This company must use SOCMA member's material for internal reasons, and customer will likely pass on the increase to consumer if price is raised on this product.		
425	3824.99.9297	Gamma Oryzanol			Limited	
426	3824.99.9297	Eastar Metal coolant blend		SOCMA member is sole supplier of this product which is in extreme world shortage. SOCMA member's U.S. customers desperately need continuous supply of this material.	None known to SOCMA member	Increase in duty on this product will undoubtedly raise prices to U.S. consumers in general as this is used in manufacturing across the board.

427	3907.30.0090	Hydronated Bisphenol A	80-04-6	This is a special custom manufactured grade of Hydronated Bisphenol A with viscosity of CPS 500-900, as well as other tailored made specifications exclusively for SOCMA member's customer in U.S. SOCMA member is the only one making a usable version of this special grade for this specific customer.	None at this particular grade/specification	Increase in duty on this product will undoubtedly raise prices to U.S. consumers in general as this is used in manufacturing across the board. Application in specialty flooring in the U.S.
428		BAAPA Tea Salts	70185-87-4	SOCMA member custom manufactures this product solely for U.S. customer. Dye intermediate used in the paper industry.	None known to SOCMA member	Application: Dye intermediate used in the paper industry. Increase in duty on this product will undoubtedly raise prices to U.S. consumers in general as this is used in manufacturing across the board.

SOCMA believes that additional duties on the listed products herein will not be effective in eliminating China's current adverse acts, policies and practices.

SOCMA hopes the Administration will consider delisting or at least stall implementing the aforementioned HTSUS subheadings. Supply chain modification (if necessary) will take years. The more lead time that the Administration can provide to modify sourcing, the better. Again though, for sake of efficiency and the already disproportionate burden faced by domestic specialty chemical manufacturers, SOCMA urges the Administration to delist all individual 8-digit categories in HTS chapters 28, 29, 32 and 38 (including 3808) from tranche 3.



Thank you again for the opportunity to comment on the Administration's proposed modification of action pursuant to Section 301 of the Trade Act of 1974.

Respectfully submitted,

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