



Wednesday, April 15, 2026

Ambassador Jameison Greer
Ambassador of the United States Trade Representative
Office of the U.S. Trade Representative
600 17th St. NW
Washington, DC 20508

**Re: Docket No. USTR-2026-0067 and USTR-2026-0068: Comments
Concerning Action Pursuant to Section 301: Acts, Policies, and Practices of
Certain Economies Relating to Structural Excess Capacity and Production in
Manufacturing Sectors**

Dear Ambassador Greer:

The Personal Care Products Council (“PCPC”) and its members appreciate the opportunity to comment on the Office of the U.S. Trade Representative’s (“USTR”) proposed action pursuant to Section 301: Acts, Policies, and Practices of Certain Economies Relating to Structural Excess Capacity and Production in Manufacturing Sectors.¹

I. Introduction

PCPC is the leading national trade association representing the global cosmetic and personal care products industry. Founded in 1894, PCPC member companies manufacture, distribute, and supply the vast majority of finished cosmetic and personal care products marketed in the United States. Our companies represent some of the most trusted and beloved brands in beauty and personal care, and we remain committed to product safety, quality, and innovation.

On average, individuals use between 6 to 12 personal care products each day, highlighting the essential role these products play in maintaining hygiene, well-being, and daily health and beauty routines. This widespread use is reflected in consumer spending patterns, with female monthly expenditures on cosmetic and personal care products ranging from approximately \$41 to \$49, while male spending ranges from about \$31 to \$41.

¹ *Initiation of Section 301 Investigations of Acts, Policies, and Practices of Certain Economies Relating to Structural Excess Capacity and Production in Manufacturing Sectors* March 17, 2026

The cosmetics and personal care industry is also one of the most dynamic and innovative industries driving the U.S. economy. The industry creates and supports millions of U.S. jobs and contributes significantly to the U.S. gross domestic product (GDP). It supports a number of thriving small-and medium-sized businesses. In fact, small, local businesses with fewer than 50 employees comprise the majority of the cosmetics and personal care industry.

Competitive access to critical manufacturing inputs is foundational to the strength of the U.S. cosmetics and personal care products industry and directly supports domestic manufacturing, innovation, and the global competitiveness of U.S. products. The industry operates through integrated global supply chains and depends on sourcing specialized ingredients and inputs that are not available domestically or at scale (see Appendix I for a list of ingredients that PCPC members are unable to source domestically or at scale). Disruptions to these supply chains increase costs, delay innovation, and weaken investment incentives in the U.S. In North America, for example, predictable trade under the USMCA framework is central to maintaining integrated manufacturing and positioning the United States as a competitive production and export platform. Preserving tariff-free treatment for USMCA compliant cosmetics, personal care products, and their inputs remains essential to supply chain resilience and continued industry success.

Export growth is equally critical to industry competitiveness, and we support the Administration's efforts to expand global market access for U.S. products by addressing the underlying drivers of trade distortions. Regulatory barriers, duplicative requirements, and other non-tariff barriers remain the primary obstacles in key export markets. We support the Administration's efforts to reduce these barriers.

II. The U.S. Cosmetics and Personal Care Products Strong Contribution to the U.S. Economy

The U.S. cosmetics and personal care products industry makes a substantial contribution to the U.S. economy, serving as a key driver of economic growth, innovation, and international trade. In 2024, the industry generated \$495.6 billion in total economic output, reflecting direct activity, extensive supply chains, and employee spending. It contributed \$242.4 billion in value added to U.S. gross domestic product (GDP), underscoring its significant role in national economic growth.

The industry supported more than 2.6 million jobs nationwide, including approximately 1.2 million direct positions across product development, manufacturing, regulatory compliance, marketing, and distribution. It generated \$110.7 billion in labor income, with average annual earnings of approximately \$54,000 per direct job, and contributed \$136.6 billion in federal, state, and local tax revenues in 2024. These figures highlight the industry's role as a powerful engine for job creation and broad-based economic impact.

The personal care products industry is dynamic and fueled by innovation and entrepreneurship. Small businesses, defined as firms with fewer than 500 employees, made up 95.5 percent of all companies in 2022, with the total number of firms growing steadily from 870 in 2004 to 1,146 in 2022.

The industry also continues to invest heavily in innovation, with more than \$1.3 billion spent on domestic research and development in 2023 to improve product safety, performance, sustainability, and formulation science. Supporting this innovation, 13.3 percent of the workforce is employed in STEM roles, helping drive ongoing scientific and technological advancement across the sector.

Economic activity for personal care products is concentrated in several key states and is deeply integrated with the global economy. California, Texas, New York, Florida and New Jersey serve as major economic hubs, collectively generating over \$100 billion in economic output and supporting more than 1.1 million jobs. The industry depends on both domestic and international trade, with New York leading in exports at \$5.5 billion. Canada is the top destination for U.S. exports, while the European Union (EU) is the leading source of imports.

Overall, the beauty industry is a key driver of economic strength and competitiveness. Through strong output, high-quality employment, tax contributions, small business participation, and sustained innovation, it supports both domestic growth and global leadership while meeting essential consumer needs.

These economic contributions are directly tied to the industry's ability to operate within efficient, flexible global supply chains, which remain essential to production, innovation, and competitiveness. This global integration not only supports sourcing and production but also underpins the industry's significant contributions to the U.S. economy.

III. Limited Domestic Capacity Necessitates Global Sourcing

A. Complex Supply Chains and Regulatory Constraints

The cosmetics and personal care products industry operates within highly specialized, globally integrated supply chains that are structured to meet stringent safety, quality, and performance regulations. These supply chains are shaped by structural realities rather than sourcing preferences. Constraints in U.S. raw materials and ingredients availability, manufacturing capabilities, and production scale impact domestic manufacturing.

PCPC member companies report that, while domestic sourcing is prioritized where possible, it is not viable for a range of critical inputs across both ingredients and packaging due to structural constraints, including limited domestic capacity, specialized technical requirements, and the lack of integrated supplier ecosystems. Accordingly, global sourcing networks are essential to ensuring reliable supply, maintaining product quality, and meeting current regulatory requirements. Access to these inputs also enables companies to concentrate higher value-added activities such as advanced manufacturing, product development, and innovation within the United States, thereby strengthening the competitiveness of the domestic industry.

Ingredient supplier qualification is particularly rigorous. All inputs must meet extensive regulatory and certification standards, and the onboarding of new suppliers requires significant time and investment in validation, testing, and compliance processes. Changes to ingredients are not straightforward substitutions. Ingredient substitutions often require reformulation and extensive testing to maintain safety, stability, and performance.

Therefore, supply chains are not readily interchangeable and cannot be reconfigured in the near term without introducing material risks to product safety, quality, and performance.

B. Ingredient Sourcing and Embedded Technical Capabilities

These structural supply chain constraints are particularly evident at the ingredient level, where sourcing is inherently global and technically specialized, driven by geographic availability, agricultural conditions, and the need for specialized chemical feedstocks. PCPC member companies emphasize that many critical natural inputs are only available at commercial scale in specific regions.

One member, for example, sources a wide range of botanical and naturally derived ingredients globally, including guar from India, Amazonian clay from Brazil, Tasmanian pepper from Australia, beeswax from Togo, argan oil from Morocco, shea butter from Burkina Faso, centella from Madagascar, and aloe vera from Mexico. Additional inputs such as hibiscus from Egypt, cocoa butter from Ghana, vanilla from Madagascar, and calendula from Morocco further underscore the geographic specificity of supply. These materials are indispensable to formulation performance and are not available domestically at sufficient scale.

In parallel, the industry relies on globally sourced upstream feedstocks that serve as the foundation for chemical ingredient manufacturing. As noted by another member, crude palm kernel and babassu oil are critical inputs used across a wide range of formulations. These materials are sourced primarily from Indonesia and Malaysia, with supplementary supply from Brazil, China, and India, and are not available in the United States at the scale required for industrial production. See Appendix I for a list of ingredients that PCPC members are unable to source domestically or at scale in the United States.

According to PCPC's analysis of the 969,000 cosmetic products² listed with the Food and Drug Administration (FDA) through December 2025 and reports from PCPC member companies, at least 42.1% of the ingredients used in cosmetics sold in the U.S., measured by their frequency of use, cannot be sourced domestically or at scale.

Importantly, the value proposition of ingredient suppliers extends well beyond the provision of raw materials. Suppliers deliver fully characterized, performance-tested ingredients supported by significant technical expertise. This includes formulation guidance, defined use parameters, stability and compatibility data, and regulatory documentation.

Cosmetic manufacturers depend on this technology and know-how associated with each ingredient. The ability to effectively incorporate an ingredient into a formulation is inseparable from the supplier's technical capabilities. This need for supplier expertise and intellectual property materially limits substitutability and reinforces the complexity of the sourcing landscape.

² Excluding tattoo preparations

C. Packaging Supply Chains and Functional Requirements

Similar constraints extend beyond ingredients to packaging, which represents an equally critical and technically demanding component of the cosmetics value chain.

Packaging serves both functional and commercial roles. It is essential to product integrity, dosing accuracy, preservation, and consumer usability, while also acting as a core element of brand identity. Even minor changes can impact product performance or alter consumer perception.

PCPC member companies report significant use of packaging imports due to gaps in U.S. manufacturing capability, particularly for high-precision and aesthetically complex components. This is especially true for aerosol packaging manufacturers who report that the U.S. aerosol industry lacks the capacity to absorb increased demand if production were forced to shift domestically. Aerosol packing manufacturing industry consolidation has further contributed to longer lead times and reduced flexibility, and only a limited number of production facilities worldwide are equipped to safely manage flammable propellants. In addition, many aerosol personal care products, such as sunscreens, antiperspirants, and skin protectants, are regulated as over-the-counter drugs in the United States, requiring highly specialized, tightly regulated manufacturing and validation processes that are not easily transferable or scalable across facilities.

In plastics, this includes dip-in applicators, lipstick mechanisms, and advanced dispensing systems. Mexico is a primary sourcing hub, supported by established expertise and ongoing capacity shifts by key suppliers. While some resin inputs are sourced domestically, international suppliers remain essential to meet the technical and design specifications required for cosmetic applications.

Constraints are even more pronounced in glass packaging. U.S. capacity for cosmetic-grade glass is extremely limited, with only one specialized manufacturer operating a single facility with finite capacity. This packaging represents a higher standard of production and finishing, requiring precise manufacturing, high-quality visual characteristics, compatibility with formulations, and the ability to support advanced decorative techniques.

These requirements place cosmetic-grade glass at the intersection of advanced manufacturing and high-end design, with production concentrated in specialized global hubs that have developed the necessary capabilities and supplier networks over many years. While increased domestic investment is an important objective, establishing comparable capabilities in the United States would require substantial, sustained investment and may not be commercially viable in the near to medium term. As a result, these inputs are not readily substitutable with domestically produced alternatives. Other domestic producers primarily serve food, beverage, and pharmaceutical markets and lack the capability to meet cosmetic-specific requirements, including high-quality finishes. The limited availability of suitable post-consumer recycled glass further complicates efforts to meet sustainability goals.

Limitations also extend to components. The cosmetics and personal care products industry relies on aluminum and steel not only for aerosol containers, but also for small yet essential inputs such as springs, valves, and metal caps used across a wide range of packaging formats. Many of these components are not produced domestically at the necessary scale or specification and must be sourced internationally. Imports are typically limited to specialized, finished components that must meet precise technical requirements, including exact metal content and verified smelting and casting origins to ensure product compatibility and maintain brand standards.

Paper-based packaging is more balanced, with sourcing across the United States, Canada, and Europe. However, broader packaging systems remain globally distributed. Electronic dispensers for hand sanitizer are sourced primarily from Indonesia, Vietnam, and China, while hand pumps and related components are sourced at scale from South Korea and Mexico, with additional supply from China and India.

Evolving regulatory requirements, including Extended Producer Responsibility frameworks and recycled content mandates across U.S. states and international markets, further constrain sourcing flexibility. Appendix II provides a representative, non-exhaustive list of packaging used by the cosmetics and personal care products industry.

These constraints, combined with the industry's reliance on global supply chains, underscore the importance of open and fair international markets as U.S. exports face increasing regulatory barriers abroad.

IV. Regulatory Barriers Impacting U.S. Cosmetics and Personal Care Products Exports

The countries subject to this Section 301 investigation represent critical export destinations and key growth markets for the U.S. cosmetics and personal care industry. Despite this commercial significance, U.S. exports face a range of burdensome and, in some instances, discriminatory non-tariff regulatory barriers that restrict market access, impede innovation, and constrain export growth.

As the Administration advances this investigation, we respectfully urge the U.S. Government to prioritize the removal of these non-tariff barriers across the markets under review. The U.S. Government has already recognized some of these barriers in the 2026 *National Trade Estimate Report on Foreign Trade Barriers*. Addressing these measures is essential to ensuring a level playing field for U.S. companies, strengthening the global competitiveness of the U.S. cosmetics sector, and enabling continued export growth.

Further details on country-specific barriers are provided in Appendix III.

V. Conclusion

The Personal Care Products Council (PCPC) appreciates the opportunity to provide information and perspectives for consideration as the Administration pursues this Section 301 investigation. Our industry relies on complex, highly regulated global supply chains, and we respectfully urge careful consideration of the potential impacts on U.S. manufacturing, competitiveness, and consumers.

We would welcome the opportunity to provide additional information or clarification on any of the points raised in this submission. For further information, please contact Natalie Obermann, Vice President, Global Strategies, PCPC, at ObermannN@personalcarecouncil.org.

Sincerely,



Heather Helm
Executive Vice President Global Strategies

Attachments: **Appendix I:** Ingredients U.S. cosmetic and personal care companies are unable to source domestically or at scale in the United States.
Appendix II: Packaging used by U.S. cosmetic and personal care companies that cannot be sourced at scale domestically
Appendix III: Regulatory Barriers Impacting U.S. Cosmetics and Personal Care Products Exports



Appendix I: Ingredients U.S. cosmetic and personal care companies are unable to source domestically or at scale in the United States.

HTS Codes (Not Exhaustive)	Cosmetic Inputs (Not Exhaustive)	Countries (Not Exhaustive)	Category
0508.00.0000	Pearl Powder	China; European Union (EU); Japan	Botanical Extracts & Plants
0603.11.0000	Rose Hydrosol	European Union (EU); Turkey	Botanical Extracts & Plants
0902.10.9000	Matcha Green Tea Powder		Botanical Extracts & Plants
0907.20.0000	Eugenia Caryophyllus (Clove) Flower Powder		Botanical Extracts & Plants
0908.11.0020	Myristica Fragrans (Nutmeg) Shell Powder	Indonesia	Botanical Extracts & Plants
1106.30.4000	Citrus Aurantifolia (Lime) Peel Powder; Vaccinium Macrocarpon (Cranberry) Fruit Extract		Botanical Extracts & Plants
1108.14.0020	Tapioca Starch	Brazil; European Union (EU)	Botanical Extracts & Plants
1108.19.0090	Rice Starch		Botanical Extracts & Plants
1108.20.0000	Inulin (In water carrier, film form)		Botanical Extracts & Plants
1204.00.0055	Linum Usitatissimum (Linseed) Seed Extract		Botanical Extracts & Plants
1211.90.4040	Peppermint Leaf		Botanical Extracts & Plants
1211.90.8950	Sage Leaf		Botanical Extracts & Plants
1211.90.8990	Aloe Barbadosensis Leaf Juice Powder; Aloe Vera Powder (In carrier blend); Anthemis Nobilis Flower Extract; Bambusa Arundinacea Stem Powder; Calendula Flower; Calendula Officinalis Flower;	European Union (EU)	Botanical Extracts & Plants

HTS Codes (Not Exhaustive)	Cosmetic Inputs (Not Exhaustive)	Countries (Not Exhaustive)	Category
	Centaurea Cyanus Flower; Cordyceps Sinensis Extract; Eucalyptus Globulus Leaf Powder; Jasmine Flower Powder; Lavender Flower; Malva Sylvestris (Mallow) Leaf Powder; Mango Seed; Quercus Alba Bark Extract; Rosemary Leaf		
1301.20.0000	Acacia Farnesiana Gum		Botanical Extracts & Plants
1301.90.9060	Olibanum	Ethiopia; Somalia	Botanical Extracts & Plants
1301.90.9190	Abies Balsamea (Balsam Canada) Resin; Cistus Ladaniferus Resin; Myroxylon Pereirae (Balsam Peru) Resin	Canada; European Union (EU); Morocco	Botanical Extracts & Plants
1302.12.0000	Dipotassium Glycyrrhizate; Glycyrrhiza Glabra (Licorice) Root Extract; Licorice Root Extract (In carrier blend)	China; India; Japan; Switzerland	Botanical Extracts & Plants
1302.19.4000	Oat Kernel Extract	Canada	Botanical Extracts & Plants
1302.19.4120	Ginseng Root Extract (In carrier blend)		Botanical Extracts & Plants
1302.19.4140	Aloe Barbadensis Leaf Juice; Aloe Barbadensis Leaf Juice Powder; Centella Asiatica Extract Blend (3 components); Chamomile Extract (In carrier blend); Echinacea Angustifolia Extract; Ginger Root Extract (In carrier blend); Ginseng Root Extract (In carrier blend); Marshmallow Root; Silybum Marianum Fruit Extract; Turmeric Extract (Curcuminoids)	Mexico	Botanical Extracts & Plants
1302.19.9040	Aloe Barbadensis Leaf Juice	Mexico	Botanical Extracts & Plants
1302.19.9100	Centella Asiatica Extract; Cocos Nucifera (Coconut) Fruit Extract; Tasmanian Pepper Extract	Australia; Madagascar	Botanical Extracts & Plants
1302.19.9140	African Yellowwood Bark Extract / Enantia Chlorantha (Blend, in carrier); Algae Extract (In carrier blend); Aloe Barbadensis Leaf Extract; Aloe Vera Oil Extract (In carrier blend); Amur Cork Tree Bark Extract; Angelica Archangelica Root Extract; Anogeissus Leiocarpa Bark Extract; Anthemis Nobilis Flower Extract; Apple Polyphenols; Ashwagandha; Bamboo Leaf Extract; Bamboo Leaf Extract / Scutellaria Baicalensis Blend; Betula Alba Bark Extract; Black Truffle Extract (In carrier blend); Boswellia Carterii Resin Extract; Botanical Oil Blend (Rose Hip/Evening Primrose);	Brazil; Canada; Chile; China; Dominican Republic; Egypt; European Union (EU); India; Israel; Japan; Madagascar; Morocco; Somalia; Switzerland; Turkey	Botanical Extracts & Plants

HTS Codes (Not Exhaustive)	Cosmetic Inputs (Not Exhaustive)	Countries (Not Exhaustive)	Category
	<p>Brown Kelp Extract (In carrier blend); Brown Seaweed Extract Blend (3 actives, in carrier); Cactus Flower Extract / Cereus Grandiflorus Water (Blend, in carrier); Camellia Flower Extract (In carrier blend); Camellia Sinensis Leaf Extract; Cassia Leaf Extract (In carrier blend); Centaury Extract (In carrier blend); Centella Asiatica Leaf Extract; Cherry Blossom Extract (In carrier blend); Chia Seed Extract (In carrier blend); Cinnamomum Camphora (Camphor) Leaf Extract; Cistus Ladaniferus Leaf/Stem Extract; Citrus Aurantium Amara (Bitter Orange) Peel Extract; Citrus Aurantium Dulcis (Orange) Flower Extract; Citrus Grandis (Grapefruit) Peel Extract; Citrus Reticulata (Tangerine) Peel Extract; Cladosiphon Okamurae Extract; Clove Extract (In carrier blend); Coleus Barbatus Root Extract; Coleus Forskohlii Root Extract; Cordyceps Sinensis Extract; Crithmum Maritimum Callus Culture Filtrate; Cucumber Fruit Extract (In carrier blend); Curcuma Longa (Turmeric) Root Extract; Daucus Carota Sativa (Carrot) Root Extract; Dipteryx Odorata Seed Extract; Echinacea Angustifolia Extract; Eclipta Prostrata Leaf Extract; Emblica Officinalis Fruit Extract; Ergothioneine (Mushroom Extract) (In carrier blend); Eryngium Maritimum Extract; Evernia Prunastri (Oakmoss) Extract; Fucoïdan (Seaweed Extract) (In carrier blend); Fucus Vesiculosus Extract; Ganoderma Lucidum (Mushroom) Extract; Garcinia Mangostana Peel Extract; Gentiana Lutea Root Extract; Geranium Extract (In carrier blend); Ginkgo Biloba Leaf Extract; Glasswort Extract (In carrier blend); Glycyrrhiza Inflata Root Extract; Goji Berry (Lycium) Extract (In carrier blend); Green Tea Extract Blend (5 components); Guarana Extract; Guggul Resin Extract (In carrier blend); Helichrysum Angustifolium Flower Extract; Hibiscus Abelmoschus Extract; Hibiscus Flower Extract; Horsetail Extract (In carrier blend); Hylocereus Undatus Fruit Extract; Hypnea Musciformis Extract; Iris Germanica Root Extract; Iris Root Extract (In carrier blend); Japanese Plum (Ume) Extract (In carrier blend); Jasminum Grandiflorum (Jasmine) Flower Extract; Jasminum Officinale (Jasmine) Flower Extract; Jasminum Sambac (Jasmine) Flower</p>		

HTS Codes (Not Exhaustive)	Cosmetic Inputs (Not Exhaustive)	Countries (Not Exhaustive)	Category
	<p>Extract; Kaempferia Galanga Root Extract; Laurus Nobilis Leaf Extract; Lavandula Angustifolia (Lavender) Flower/Leaf/Stem Extract; Lavandula Intermedia Flower/Leaf/Stem Extract; Lilyturf Root Extract (In carrier blend); Litchi Seed Extract (In carrier blend); Loquat Leaf Extract (In carrier blend); Lotus Flower Extract (In carrier blend); Magnolia Officinalis Bark Extract; Malva Sylvestris (Mallow) Leaf Powder; Mandarin Peel Extract; Mango Fruit Extract (In carrier blend); Menyanthes Trifoliata Leaf Extract; Milk Thistle Extract / Silybum Marianum (Blend, in carrier); Mimosa Tenuiflora Bark Extract; Mugwort Extract / Laminaria Digitata (Blend, in carrier); Myrtle Leaf Extract (In carrier blend); Myrtus Communis Leaf Extract; Narcissus Bulb Extract (In carrier blend); Nymphaea Caerulea Flower Extract; Oat Kernel Extract; Oat Kernel Extract / Aviculare Extract (Blend, in carrier); Olive Fruit Extract (In carrier blend); Orange Blossom Absolute; Orange Extract; Osmanthus Fragrans Flower Extract; Padina Pavonica Algae Extract (In carrier blend); Passiflora Alata Fruit Extract; Peach Flower Extract; Perilla Seed Extract (In carrier blend); Phyllanthus Emblica Fruit Extract; Phyllostachys Edulis Leaf Extract; Phyllostachys Nigra Leaf Extract; Pink Rockrose Extract (In carrier blend); Pinus Sylvestris Bud Extract; Polygonum Cuspidatum Root Extract; Poria Cocos Extract; Prunus Armeniaca (Apricot) Seed Powder; Prunus Domestica Seed Extract; Psidium Guajava Leaf Extract; Punica Granatum Juice Extract; Quillaja Saponaria Bark Extract; Quinoa Seed Extract (In carrier blend); Reishi Mushroom; Rice Extract (In carrier blend); Rice Extract Blend (3 actives, in carrier); Rooibos Leaf Extract (In carrier blend); Rosa Damascena Extract; Rosemary Leaf; Rosemary Leaf Extract; Rosmarinus Officinalis (Rosemary) Extract; Rosmarinus Officinalis (Rosemary) Leaf Extract; SWT Botanical Extract; Saccharum Officinarum (Sugarcane) Extract; Salicornia Herbacea Extract; Salvia Sclarea (Clary) Extract; Sasa Kurilensis Water; Saw Palmetto; Sclareolide; Sea Whip Extract (In carrier blend); Serenoa Serrulata Fruit Extract; Sesbania Grandiflora Flower Extract; Shell Ginger Leaf Extract (In carrier blend); Silk</p>		

HTS Codes (Not Exhaustive)	Cosmetic Inputs (Not Exhaustive)	Countries (Not Exhaustive)	Category
	Tree Bark Extract (In carrier blend); Silybum Marianum Fruit Extract; Snow Lotus Extract; Souou Botanical Extract; Sunflower Seed Extract (In carrier blend); Sweet Almond Seed Extract (In carrier blend); Swertia Chirata Leaf Extract; Tansy Extract; Trifolium Pratense (Clover) Extract; Trigonella Foenum-Graecum Seed Extract; Vanilla Extract Blend (4 actives, in carrier); Vanilla Planifolia Fruit Extract; Viola Odorata Leaf Extract; Vitis Vinifera (Grape) Leaf Extract; Vitis Vinifera (Grape) Seed Extract; Watershield Extract; White Mulberry Root Extract (In carrier blend); White Peony Extract (In carrier blend); Willowherb Extract (In carrier blend); Withania Somnifera Root Extract; Zingiber Officinale (Ginger) Root Extract		
1302.32.0000	Guar Gum	China; India	Botanical Extracts & Plants
1302.32.0020	Cyamopsis Tetragonoloba (Guar) Gum; Guar Gum; Guar Hydroxypropyltrimonium Chloride; Hydroxypropyl Guar Hydroxypropyltrimonium Chloride	China; European Union (EU); India	Botanical Extracts & Plants
1302.39.0010	Algin; Carrageenan (Seaweed Gum) (In carrier blend)	Norway; United Kingdom	Botanical Extracts & Plants
1302.39.0090	Caesalpinia Spinosa Gum; Glucomannan	European Union (EU); Taiwan	Botanical Extracts & Plants
1404.90.9090	Bambusa Arundinacea Stem Powder; Juglans Regia (Walnut) Shell Powder	European Union (EU)	Botanical Extracts & Plants
1507.10.0000	Rubus Idaeus (Raspberry) Seed Oil		Fats, Oils & Waxes
1509.10.0000	Olea Europaea (Olive) Fruit Extract	European Union (EU); Tunisia	Fats, Oils & Waxes
1509.20.9030	Olea Europaea (Olive) Fruit Oil		Fats, Oils & Waxes
1509.90.4000	Olea Europaea (Olive) Fruit Oil	European Union (EU); Japan; Tunisia	Fats, Oils & Waxes
1510.90.1000	Olea Europaea (Olive) Fruit Oil		Fats, Oils & Waxes
1511.90.0000	Elaeis Guineensis (Palm) Oil; Mauritia Flexuosa Fruit Oil; Oils Palm	Brazil; Colombia; Thailand	Fats, Oils & Waxes
1511.90.3200	Glycerin (Palm-Derived); Palm Stearin (RBD)	Indonesia; Malaysia; Philippines	Fats, Oils & Waxes

HTS Codes (Not Exhaustive)	Cosmetic Inputs (Not Exhaustive)	Countries (Not Exhaustive)	Category
1512.11.0025	Helianthus Annuus (Sunflower) Seed Oil		Fats, Oils & Waxes
1512.11.0035	Helianthus Annuus (Sunflower) Seed Oil Unsaponifiables		Fats, Oils & Waxes
1512.19.0025	Helianthus Annuus (Sunflower) Seed Oil; Sunflower Seed Oil		Fats, Oils & Waxes
1512.19.0040	Carthamus Tinctorius (Safflower) Seed Oil; Helianthus Annuus (Sunflower) Seed Oil; Safflower Seed Oil	European Union (EU); United Kingdom	Fats, Oils & Waxes
1513.19.0000	Cocos Nucifera (Coconut) Fruit Extract; Cocos Nucifera (Coconut) Oil	Brazil; India; Philippines	Fats, Oils & Waxes
1513.21.0000	Palm Kernel Oil	Brazil; China; India; Indonesia; Malaysia	Fats, Oils & Waxes
1513.29.0000	Orbignya Oleifera Seed Oil	Brazil	Fats, Oils & Waxes
1513.29.9900	Palm Kernel Oil (Refined)		Fats, Oils & Waxes
1514.19.0000	Brassica Campestris (Rapeseed) Seed Oil; Oils Rape Seed	Canada	Fats, Oils & Waxes
1515.29.0040	Zea Mays (Corn) Oil		Fats, Oils & Waxes
1515.30.0000	Ricinus Communis (Castor) Seed Oil	European Union (EU); India; Indonesia; Malaysia	Fats, Oils & Waxes
1515.50.0000	Sesamum Indicum (Sesame) Seed Oil	European Union (EU); Mexico; United Kingdom	Fats, Oils & Waxes
1515.90.2000	Butyrospermum Parkii (Shea) Butter	Burkina Faso	Fats, Oils & Waxes
1515.90.2100	Aleurites Moluccanus Seed Oil; Astrocaryum Murumuru Seed Butter; Bertholletia Excelsa Seed Oil; Butyrospermum Parkii (Shea) Butter; Macadamia Integrifolia Seed Oil; Macadamia Ternifolia Seed Oil; Mangifera Indica (Mango) Seed Butter; Persea Gratissima (Avocado) Oil; Prunus Amygdalus Dulcis (Sweet Almond) Oil; Prunus Armeniaca (Apricot) Kernel Oil; Prunus Domestica Seed Extract; Sclerocarya Birrea Seed Oil; Shea Butter (Refined) / Unsaponifiables Blend; Shorea Stenoptera Seed Butter	Brazil; Burkina Faso; European Union (EU); Ghana; South Africa	Fats, Oils & Waxes
1515.90.6000	Butyrospermum Parkii (Shea) Butter; Jojoba Oil / Dunaliella Extract Blend; Simmondsia Chinensis (Jojoba) Seed Oil	Burkina Faso	Fats, Oils & Waxes
1515.90.8000	Fats & Oils Vegetables Other	European Union (EU); Mexico	Fats, Oils & Waxes

HTS Codes (Not Exhaustive)	Cosmetic Inputs (Not Exhaustive)	Countries (Not Exhaustive)	Category
1515.90.8090	Argania Spinosa Kernel Oil; Babassu Oil; Geranium Bourbon Oil; Sclerocarya Birrea Seed Oil	Brazil; Madagascar; Morocco	Fats, Oils & Waxes
1515.90.8100	Argania Spinosa Kernel Oil	Morocco	Fats, Oils & Waxes
1515.90.8110	Cannabis Sativa Seed Oil	China	Fats, Oils & Waxes
1515.90.8190	Acai Fruit Oil; Adansonia Digitata Seed Oil; Argania Spinosa Kernel Oil; Avocado Butter (In carrier blend); Botanical Oil Blend; Calophyllum Inophyllum Seed Oil; Camelina Sativa Seed Oil; Camellia Japonica Seed Oil; Camellia Oleifera Seed Oil; Canarium Indicum Seed Oil; Carapa Guianensis Seed Oil; Citrullus Lanatus (Watermelon) Seed Oil; Coffea Arabica (Coffee) Seed Oil; Coriandrum Sativum (Coriander) Seed Oil; Crambe Abyssinica Seed Oil; Cranberry Seed Oil; Cucurbita Pepo (Pumpkin) Seed Oil; Euterpe Oleracea Fruit Oil; Garcinia Indica Seed Butter; Helianthus Annuus (Sunflower) Seed Oil Unsaponifiables; Hippophae Rhamnoides Fruit Oil; Limnanthes Alba (Meadowfoam) Seed Oil; Mangifera Indica (Mango) Seed Butter; Mauritia Flexuosa Fruit Oil; Moringa Oleifera Seed Oil; Oenothera Biennis (Evening Primrose) Oil; Oryza Sativa (Rice) Bran Oil; Oryza Sativa (Rice) Germ Oil; Passiflora Edulis Seed Oil; Persea Gratissima (Avocado) Oil; Pomegranate Seed Oil (In carrier blend); Pongamia Glabra Seed Oil; Pouteria Sapota Seed Butter; Pouteria Sapota Seed Oil; Prunus Amygdalus Dulcis (Sweet Almond) Oil; Punica Granatum Seed Oil; Pyrus Malus (Apple) Seed Oil; Rosa Canina Fruit Oil; Rosa Rubiginosa Seed Oil; Rubus Idaeus (Raspberry) Seed Oil; Shorea Stenoptera Seed Butter; Silybum Marianum Seed Oil; Simmondsia Chinensis (Jojoba) Butter; Theobroma Grandiflorum Seed Butter; Triticum Vulgare (Wheat) Germ Oil; Vaccinium Macrocarpon (Cranberry) Seed Oil; Vaccinium Myrtillus Seed Oil; Vitis Vinifera (Grape) Seed Oil; Ximenia Americana Seed Oil	Brazil; Canada; China; European Union (EU); French Polynesia; Guatemala; India; Israel; Japan; Kenya; Morocco; Saint Vincent and the Grenadines; Senegal; South Korea; Turkey; Ukraine; United Kingdom; Vanuatu	Fats, Oils & Waxes
1516.20.4600	HYRDOGENATED RBD PALM OIL IV40; Hydrogenated Palm Oil; Hydrogenated RBD palm oli IV40	Indonesia; Malaysia; Philippines	Fats, Oils & Waxes
1516.20.9100	Hydrogenated Castor Oil; Hydrogenated Olive Oil Blend (3 components); Hydrogenated Vegetable Oil; Hydrogenated Vegetable Oil Blend (4 components); Jasminum Officinale	European Union (EU); India; Indonesia	Fats, Oils & Waxes

HTS Codes (Not Exhaustive)	Cosmetic Inputs (Not Exhaustive)	Countries (Not Exhaustive)	Category
	(Jasmine) Flower Wax; Lavandula Angustifolia (Lavender) Flower Wax; Moringa Oil/Hydrogenated Moringa Oil Esters; Narcissus Poeticus Flower Wax; Raspberry Leaf Wax; Rose Flower Wax / Rosa Centifolia Blend		
1518.00.4000	Botanical Oil Blend (Wheat Germ/Grape); Passionfruit Extract Blend (3 components); Sea Buckthorn Oil (In carrier blend); Simmondsia Chinensis (Jojoba) Butter		Fats, Oils & Waxes
1520.00.1000	Crude Glycerin (Vegetable)	Indonesia; Malaysia; Philippines	Fats, Oils & Waxes
1521.10.0000	Beeswax; Copernicia Cerifera (Carnauba) Wax	Togo	Fats, Oils & Waxes
1521.10.0020	Candelilla Wax; Candelilla Wax Blend (3 components); Euphorbia Cerifera (Candelilla) Wax	European Union (EU); Mexico	Fats, Oils & Waxes
1521.10.0040	Carnauba Wax Blend (3 components); Copernicia Cerifera (Carnauba) Wax	Brazil	Fats, Oils & Waxes
1521.10.0060	Citrus Aurantium Amara (Bitter Orange) Flower Wax; Jasmine Flower Powder; Myrica Cerifera (Bayberry) Fruit Wax; Violet Leaf Wax		Fats, Oils & Waxes
1521.90.0000	Citrus Aurantium Amara (Bitter Orange) Flower Wax; Copernicia Cerifera (Carnauba) Wax; Euphorbia Cerifera (Candelilla) Wax; Jasminum Officinale (Jasmine) Flower Wax; Lavandula Angustifolia (Lavender) Flower Wax; Myrica Cerifera (Bayberry) Fruit Wax	Brazil; Colombia; Egypt; European Union (EU); Mexico	Fats, Oils & Waxes
1521.90.2000	Beeswax	China; European Union (EU); Togo	Fats, Oils & Waxes
1701.12.5000	Sucrose		Botanical Extracts & Plants
1701.99.5050	Sucrose	Brazil; Mexico; Saudi Arabia	Botanical Extracts & Plants
1702.30.2800	Dextrose Anhydrous	China	Botanical Extracts & Plants
1702.90.9000	Maltodextrin	Canada	Botanical Extracts & Plants
1804.00.0000	Theobroma Cacao (Cocoa) Seed Butter; Theobroma Grandiflorum Seed Butter	European Union (EU); Ghana	Botanical Extracts & Plants

HTS Codes (Not Exhaustive)	Cosmetic Inputs (Not Exhaustive)	Countries (Not Exhaustive)	Category
1805.00.0000	Cocoa Powder		Botanical Extracts & Plants
2101.11.2949	Coffee Seed Extract (In carrier blend)		Botanical Extracts & Plants
2101.20.2090	Camellia Sinensis Leaf Extract; Green Tea Extract (In carrier blend)		Botanical Extracts & Plants
2106.90.9999	Ribonucleotides	Thailand	Botanical Extracts & Plants
2501.00.0000	Dead Sea Salt Blend (4 actives, in carrier); Sea Salt	European Union (EU)	Minerals & Clays
2507.00.0000	Aluminum Silicate	Brazil; European Union (EU); United Kingdom	Minerals & Clays
2508.10.0000	Illite Extract		Minerals & Clays
2508.40.0150	Illite; Sea Silt Extract	European Union (EU)	Minerals & Clays
2512.00.0000	Diatomaceous Earth	European Union (EU)	Minerals & Clays
2513.10.0080	Pumice	European Union (EU)	Minerals & Clays
2525.20.0000	Mica	European Union (EU); Japan; United Kingdom	Minerals & Clays
2526.20.0000	Talc	China; European Union (EU); Japan	Minerals & Clays
2530.90.8050	Lithium Magnesium Sodium Silicate; Meteorite Mineral Powder (In carrier blend); Rhodochrosite; Rhodochrosite Extract; Sea Silt Extract; Zeolite	Brazil; Canada; European Union (EU); United Kingdom	Minerals & Clays
2710.12.9000	Isododecane; Isoparaffin (Hydrocarbon Emollient)		Fats, Oils & Waxes
2710.19.3000	Mineral Oil	Canada	Fats, Oils & Waxes
2710.19.9000	Isoeicosane; Isohexadecane		Fats, Oils & Waxes
2712.10.0000	Petrolatum	Canada	Fats, Oils & Waxes
2712.20.0000	Paraffin		Fats, Oils & Waxes
2804.69.5000	Silicon Feedstock	Brazil; China	Inorganic Chemicals

HTS Codes (Not Exhaustive)	Cosmetic Inputs (Not Exhaustive)	Countries (Not Exhaustive)	Category
2805.19.9010	Lithium (Alkali Metal)	China; European Union (EU); India; Taiwan	Inorganic Chemicals
2811.19.6100	Sulfamic Acid	China	Inorganic Chemicals
2811.22.5000	Hydrated Silica; Silica	European Union (EU); Japan; South Korea	Inorganic Chemicals
2814.20.0000	Ammonia (Aqueous Solution)	Canada	Inorganic Chemicals
2817.00.0000	Zinc Oxide		Inorganic Chemicals
2821.10.0020	Iron Oxides		Inorganic Chemicals
2823.00.0000	Titanium Dioxide	Canada; European Union (EU); Japan	Inorganic Chemicals
2825.80.0000	Antimony Oxide	China; European Union (EU); India; Taiwan	Inorganic Chemicals
2827.20.0000	Calcium Chloride	European Union (EU)	Inorganic Chemicals
2827.49.5000	Aluminum Chlorohydrate / Aluminum Zirconium Compound; Bismuth Oxychloride	India; Mexico; Saint Vincent and the Grenadines	Inorganic Chemicals
2828.90.0000	Halide Salts (Chlorides/Bromides)	Canada; China; Mexico	Inorganic Chemicals
2832.10.0000	Sodium Metabisulfite; Sodium Sulfite	European Union (EU)	Inorganic Chemicals
2833.11.5010	Sodium Sulfate		Inorganic Chemicals
2833.21.0000	Magnesium Sulfate	European Union (EU); Japan	Inorganic Chemicals
2833.27.0000	Barium Sulfate	Japan	Inorganic Chemicals
2833.29.5190	Magnesium Sulfate (White Sands)		Inorganic Chemicals
2835.10.0000	Sodium Phosphonate	China; European Union (EU); India; Taiwan	Inorganic Chemicals
2835.26.0000	Hydroxyapatite	Japan	Inorganic Chemicals
2836.50.0000	Calcium Carbonate; Pearl Powder		Inorganic Chemicals

HTS Codes (Not Exhaustive)	Cosmetic Inputs (Not Exhaustive)	Countries (Not Exhaustive)	Category
2836.99.3000	Ammonium Carbonate	European Union (EU)	Inorganic Chemicals
2836.99.5050	Magnesium Carbonate; Rhodochrosite Extract	European Union (EU)	Inorganic Chemicals
2837.90.9000	Inorganic Salts (Nitrates/Nitrites)	Canada; China; Mexico	Inorganic Chemicals
2839.90.5000	Calcium Silicate; Lithium Magnesium Sodium Silicate		Inorganic Chemicals
2842.10.0000	Synthetic Fluorophlogopite; Zeolite (Aluminosilicate)	China; Japan	Inorganic Chemicals
2847.00.0000	Hydrogen Peroxide		Inorganic Chemicals
2901.10.0050	Isododecane; Isoeicosane; Isohexadecane	European Union (EU)	Organic Chemicals
2902.19.0050	Beta-Caryophyllene; Longifolene		Organic Chemicals
2903.11.0000	Chloromethane (Propellant)	European Union (EU)	Organic Chemicals
2903.43.1000	Fluoroethane (HFC Propellant)	China	Organic Chemicals
2904.10.3200	Aromatic Sulfonated Compound	China; European Union (EU); India; Taiwan	Organic Chemicals
2905.16.0050	Octanol (Fatty Alcohol)		Organic Chemicals
2905.17.0000	Cetyl Alcohol; Fatty Alcohol; Fatty Alcohols (C12-C18)	European Union (EU); Indonesia; Malaysia	Organic Chemicals
2905.19.1000	Pentanol (Amyl Alcohol)	Indonesia	Organic Chemicals
2905.19.9090	Isocetyl Alcohol		Organic Chemicals
2905.22.5010	Citronellol		Organic Chemicals
2905.22.5050	2,6-Dimethyl-7-Octen-2-ol; Linalool; Nerolidol	China; European Union (EU)	Organic Chemicals
2905.39.6000	1,2-Hexanediol; Caprylyl Glycol; Hexylene Glycol; Isopentyldiol; Phytantriol	Brazil; European Union (EU); Japan; Switzerland	Organic Chemicals
2905.39.9000	1,2-Hexanediol; Isopentyldiol; Propanediol		Organic Chemicals
2905.43.0000	Mannitol (Sugar Alcohol)		Organic Chemicals
2905.45.0000	Glycerin; Glycerin Blend (3 components)	Indonesia; Malaysia; Philippines	Organic Chemicals
2905.49.1000	Phytantriol		Organic Chemicals

HTS Codes (Not Exhaustive)	Cosmetic Inputs (Not Exhaustive)	Countries (Not Exhaustive)	Category
2906.11.0000	Menthol	China; European Union (EU); India; Switzerland	Organic Chemicals
2906.13.1000	Inositol	Canada; China; Mexico	Organic Chemicals
2906.13.5000	Phytosterols; Sodium Beta-Sitosteryl Sulfate	Japan	Organic Chemicals
2906.19.3000	Terpineol		Organic Chemicals
2906.19.5000	Bisabolol; Menthanediol	European Union (EU); Japan	Organic Chemicals
2906.21.0000	Benzyl Alcohol	China; European Union (EU)	Organic Chemicals
2906.29.2000	Cinnamyl Alcohol; Methyl Phenylbutanol	European Union (EU)	Organic Chemicals
2906.29.6000	Methyl Phenylbutanol	European Union (EU)	Organic Chemicals
2907.15.1000	1-Naphthol	China	Organic Chemicals
2907.19.4000	Thymol		Organic Chemicals
2907.21.0000	Resorcinol	China	Organic Chemicals
2907.29.9000	Methylresorcinol (Hair Dye) (In carrier blend); Polygonum Cuspidatum Root Extract		Organic Chemicals
2908.19.6000	Chloroxylenol	China	Organic Chemicals
2909.19.6000	Polyhydric Alcohol Ethers	Indonesia	Organic Chemicals
2909.49.1500	Phenoxyethanol	European Union (EU); India; South Korea	Organic Chemicals
2909.50.4500	Aromatic Ether-Alcohol	Mexico	Organic Chemicals
2912.19.2000	Aldehyde; Decanal	China	Organic Chemicals
2912.29.6000	Aldehyde; Ethyl 2,2-Dimethylhydrocinnamal; Perillaldehyde	China; Japan	Organic Chemicals
2912.29.6010	Floralozone (Fragrance Aldehyde) / Astragalus Blend; Perillaldehyde		Organic Chemicals
2912.41.0000	Vanillin	China; European Union (EU)	Organic Chemicals
2912.49.5500	Hydroxycitronellal		Organic Chemicals
2912.50.1000	Metaldehyde	Switzerland	Organic Chemicals

HTS Codes (Not Exhaustive)	Cosmetic Inputs (Not Exhaustive)	Countries (Not Exhaustive)	Category
2914.29.3000	Camphor		Organic Chemicals
2914.29.5000	Camphor; Ketone	China; Switzerland	Organic Chemicals
2914.50.3000	Butyl Methoxydibenzoylmethane	China	Organic Chemicals
2915.39.4000	Linalyl Acetate		Organic Chemicals
2915.39.4550	Cedryl Acetate; Citronellyl Acetate; Geranyl Acetate; Guaiacwood Acetate; Linalyl Acetate; Menthyl Acetate; Octyl Acetate	China	Organic Chemicals
2915.40.0000	Monochloroacetic Acid	China; European Union (EU)	Organic Chemicals
2915.50.5000	Arachidyl Propionate		Organic Chemicals
2915.60.1000	Butyric/Valeric Acid Esters	Indonesia	Organic Chemicals
2915.70.0100	Ethyl Palmate; Isopropyl Palmitate	Brazil; Indonesia; Malaysia	Organic Chemicals
2915.70.0150	Aluminum Distearate; Cetyl Palmitate; Ethyl Palmate; Magnesium Stearate; Palmitate/Stearate Esters; Stearyl Stearoyl Stearate	European Union (EU); Indonesia	Organic Chemicals
2915.70.1000	Palmitic Acid; Zinc Stearate	Indonesia; Malaysia; Philippines; Singapore	Organic Chemicals
2915.70.1050	Myristic Acid	Indonesia; Malaysia	Organic Chemicals
2915.90.1000	Fatty Acids (Animal/Vegetable)	Indonesia; Malaysia; Philippines	Organic Chemicals
2915.90.1010	Lauric Acid	Indonesia; Malaysia	Organic Chemicals
2915.90.1050	Fatty Acids (NESOI)	Indonesia	Organic Chemicals
2915.90.2000	Lauric Acid; Myristic Acid	Indonesia; Malaysia; Philippines	Organic Chemicals
2915.90.5050	Aluminum Distearate; Arachidyl Propionate; Bis-Isostearyl Dimer Dilinoleyl Dimer Dilinoleate; Calcium Stearate; Cetyl Palmitate; Cetyl Ricinoleate; Glyceryl Behenate/Eicosadioate; Glyceryl Laurate; Glyceryl Stearate Citrate; Isopropyl Isostearate; Lauryl Laurate; Magnesium Myristate; Propylene Glycol Isostearate; Triundecanoic; Zinc Laurate	Canada; European Union (EU); Japan; Singapore; United Kingdom	Organic Chemicals
2915.90.7098	Monocarboxylic Acid Esters	Indonesia	Organic Chemicals
2915.90.9000	Capric Acid; Caprylic Acid	Indonesia; Malaysia; Philippines	Organic Chemicals

HTS Codes (Not Exhaustive)	Cosmetic Inputs (Not Exhaustive)	Countries (Not Exhaustive)	Category
2916.19.1000	Potassium Sorbate; Unsaturated Carboxylic Acid	China; European Union (EU); Israel	Organic Chemicals
2916.31.0000	Sodium Benzoate	China	Organic Chemicals
2916.32.2000	Benzoyl Chloride	European Union (EU)	Organic Chemicals
2916.39.2100	Cinnamic Acid Derivatives		Organic Chemicals
2917.12.5000	Diisostearyl Adipate		Organic Chemicals
2917.19.3000	Ethylene Brassylate	China	Organic Chemicals
2918.11.5100	Ethyl Lactate; Hydroxy/Oxy Carboxylic Acid / Zinc Sulfate (Blend, in carrier); Isostearyl Lactate; Octyldodecyl Lactate	Japan	Organic Chemicals
2918.12.0000	Tartaric Acid	European Union (EU)	Organic Chemicals
2918.14.0000	Citric Acid; Citric Acid Anhydrous ex Sucroal; Citric Acid Anhydrous ex SunshineBiotech	China; Colombia; Thailand	Organic Chemicals
2918.15.1000	Sodium Citrate	Canada; European Union (EU); United Kingdom	Organic Chemicals
2918.15.5000	Potassium Citrate ex Gadot; Sodium Citrate ex Gadot; Sodium Citrate ex Sucroal	Colombia; Israel	Organic Chemicals
2918.16.5010	Sodium Gluconate / Polysorbate 60 Blend		Organic Chemicals
2918.16.5050	Ferrous Gluconate		Organic Chemicals
2918.19.1200	Mandelic Acid; Mandelic Acid Blend (3 components)	China; European Union (EU); India; Taiwan	Organic Chemicals
2918.19.9000	Cetyl Ricinoleate; Ferrous Gluconate; Glyceryl Triacetyl Hydroxystearate; Hydroxystearic Acid; Mandelic Acid; Pyruvic Acid; Sodium Gluconate; Sodium Ursolate; Trihydroxystearin; Ursolic Acid	European Union (EU); Hong Kong; India; Taiwan	Organic Chemicals
2918.21.5000	Magnesium Salicylate; Salicylic Acid	China	Organic Chemicals
2918.23.2000	Amyl Salicylate; Hydroxy/Oxy Carboxylic Acid	Switzerland	Organic Chemicals
2918.23.5000	Homosalate	China	Organic Chemicals
2918.29.2500	Methylparaben	Japan	Organic Chemicals
2918.29.7500	Parabens	Japan	Organic Chemicals
2918.30.9000	Pyruvic Acid		Organic Chemicals

HTS Codes (Not Exhaustive)	Cosmetic Inputs (Not Exhaustive)	Countries (Not Exhaustive)	Category
2918.99.0500	p-Anisic Acid		Organic Chemicals
2918.99.5000	Glycyrrhetic Acid; Hydroxy/Oxy Carboxylic Acid; Ursolic Acid; p-Anisic Acid	China; India	Organic Chemicals
2919.90.5050	Phosphoric Acid Ester; Phytic Acid; Sodium Phytate	China	Organic Chemicals
2920.90.1000	Phosphoric Acid Ester	Indonesia	Organic Chemicals
2920.90.5100	Phosphoric Acid Ester	China	Organic Chemicals
2921.19.6090	2,6-Diaminopyridine	China	Organic Chemicals
2921.51.1000	Toluene-2,5-Diamine Sulfate		Organic Chemicals
2921.51.5000	N,N-Bis(2-Hydroxyethyl)-p-Phenylenediamine Sulfate; Toluene-2,5-Diamine Sulfate	China; India	Organic Chemicals
2922.19.9690	Amino Acid / Amino-Alcohol (In carrier blend); Amino Acid / Amino-Alcohol / Tetrahydroxypropyl Ethylenediamine Blend; Ceramide 2 (Retired); Ceramide 3 (Retired); Phytosphingosine; Tetraacetylphytosphingosine; Tetrahydroxypropyl Ethylenediamine	European Union (EU); South Korea	Organic Chemicals
2922.29.1000	m-Aminophenol; p-Aminophenol	China	Organic Chemicals
2922.29.1300	o-Aminophenol		Organic Chemicals
2922.29.6100	4-Amino-2-Hydroxytoluene; o-Aminophenol	China; India	Organic Chemicals
2922.29.8190	2,4-Diaminophenoxyethanol HCl; N,N-Bis(2-Hydroxyethyl)-p-Phenylenediamine Sulfate; p-Aminophenol	China	Organic Chemicals
2922.42.1000	Sodium Glutamate	Vietnam	Organic Chemicals
2922.49.3700	Amino Acid / Amino-Alcohol; Arginine	Indonesia; Japan	Organic Chemicals
2922.49.4950	Alanine; Tetrasodium EDTA	China	Organic Chemicals
2922.49.8000	Amino Acid / Amino-Alcohol; Dihydroxypropyl Arginine HCl; Dipotassium EDTA; Disodium EDTA-Copper (In water carrier); EDTA; Methyl Anthranilate; Tetrasodium EDTA	European Union (EU); Indonesia; Japan; Switzerland	Organic Chemicals
2922.50.3500	2-Methyl-5-Hydroxyethylaminophenol	China	Organic Chemicals
2922.50.4000	Alily-N-Methyl Anthranilate		Organic Chemicals
2922.50.5000	Amino Acid / Amino-Alcohol	Indonesia	Organic Chemicals
2923.20.2050	Lecithin; Phosphatidylcholine; Phosphatidylethanolamine; Quaternary Ammonium Salt	European Union (EU)	Organic Chemicals

HTS Codes (Not Exhaustive)	Cosmetic Inputs (Not Exhaustive)	Countries (Not Exhaustive)	Category
2923.90.0100	Betaines Alkylamidopropyl; Quaternary Ammonium Salt; Quats Monoalkyl; Starch Hydroxypropyltrimonium Chloride	European Union (EU); Indonesia; Mexico; South Korea	Organic Chemicals
2924.19.1150	Dibutyl Lauroyl Glutamide		Organic Chemicals
2924.19.8000	Amide Compound; Ceramide 2 (Retired); Ceramide 3 (Retired); Dibutyl Ethylhexanoyl Glutamide; Dibutyl Lauroyl Glutamide; Stearamidopropyl Dimethylamine; Tetraacetylphytosphingosine	Brazil; China; European Union (EU); India; Japan; South Korea; Taiwan	Organic Chemicals
2925.29.9000	Arginine (Amino Acid) Blend (3 components)		Organic Chemicals
2926.90.4801	Octocrylene	China; European Union (EU)	Organic Chemicals
2928.00.5000	Hydrazine Derivative	China; European Union (EU); India; Taiwan	Organic Chemicals
2930.90.4650	Cysteine	European Union (EU)	Organic Chemicals
2931.49.0080	Organosilicon Compound Blend (3 components)		Organic Chemicals
2931.90.7000	Urea	China; European Union (EU); India; Taiwan	Organic Chemicals
2931.90.9000	Organosilicon Compound	European Union (EU); Japan	Organic Chemicals
2932.20.3000	Ascorbyl Tocopheryl Maleate		Organic Chemicals
2932.20.5050	Dehydroacetic Acid; Fragrance Lactone/Coumarin Type; Heterocyclic (Oxygen); Magnesium Ascorbyl Phosphate	China; European Union (EU); India; Taiwan	Organic Chemicals
2932.93.0000	Heliotropine	China	Organic Chemicals
2932.99.9010	Heterocyclic (Oxygen) Blend (3 components)		Organic Chemicals
2932.99.9090	Ambroxide; Lactobionic Acid		Organic Chemicals
2933.19.9000	1-Hydroxyethyl 4,5-Diamino Pyrazole Sulfate	China	Organic Chemicals
2933.21.0000	Allantoin	European Union (EU)	Organic Chemicals
2933.39.1000	2,6-Diaminopyridine		Organic Chemicals
2933.39.6191	2,6-Dihydroxy-3,4-Dimethylpyridine; Menthyl PCA; Pyridine Derivative; Pyridoxine Dipalmitate; Sodium PCA	Brazil; China; European Union	Organic Chemicals

HTS Codes (Not Exhaustive)	Cosmetic Inputs (Not Exhaustive)	Countries (Not Exhaustive)	Category
		(EU); India; Japan; Taiwan	
2933.39.9000	Zinc Pyrithione	South Korea	Organic Chemicals
2933.59.9500	Tetraaminopyrimidine Sulfate	China	Organic Chemicals
2933.79.8500	Heterocyclic (Nitrogen) (In carrier blend); Heterocyclic (Nitrogen) Blend (3 components); Lauryl PCA; Menthyl PCA		Organic Chemicals
2933.99.8210	Benzotriazole; Lauryl PCA	China; European Union (EU); India; Taiwan	Organic Chemicals
2933.99.8220	Tolyltriazole	China; European Union (EU); India; Taiwan	Organic Chemicals
2934.99.3900	Tocopheryl Nicotinate		Organic Chemicals
2934.99.9001	Nucleic Acid / Heterocyclic		Organic Chemicals
2936.21.0000	Retinyl Palmitate	Switzerland	Organic Chemicals
2936.24.0100	Panthenol; Panthenyl Ethyl Ether	China; Switzerland; United Kingdom	Organic Chemicals
2936.26.0000	Cyanocobalamin	European Union (EU)	Organic Chemicals
2936.27.0000	3-O-Ethyl Ascorbic Acid; Aminopropyl Ascorbyl Phosphate; Ascorbic Acid; Ascorbyl Glucoside; Magnesium Ascorbyl Phosphate; Sodium Ascorbate; Sodium Ascorbyl Phosphate; Vitamin C (Ascorbic Acid)	Canada; China; European Union (EU); Japan; Mexico; South Korea; Taiwan; United Kingdom	Organic Chemicals
2936.28.0000	Ascorbyl Tocopheryl Maleate; Palm Tocotrienol; Tocopherol; Tocopheryl Acetate; Tocopheryl Linoleate/Oleate; Tocopheryl Nicotinate; Vitamin E (Tocopherol); Vitamin E (Tocopherol) / Amodimethicone Blend	China; European Union (EU); Japan; Switzerland; United Kingdom	Organic Chemicals
2936.29.1630	Biotin; Niacinamide; Pyridoxine Dipalmitate	China; European Union (EU)	Organic Chemicals
2938.90.0000	Glycoside Blend (3 components); Glycyrrhetic Acid; Glycyrrhiza Glabra (Licorice) Root Extract; Glycyrrhizic Acid; Stearyl Glycyrrhetinate; Stevia R98	China; India; Japan	Organic Chemicals

HTS Codes (Not Exhaustive)	Cosmetic Inputs (Not Exhaustive)	Countries (Not Exhaustive)	Category
2940.00.6000	Ascorbyl Glucoside; Blend of Cyclodextrin (And) Tocopherol; Psicose; Sucrose Acetate Isobutyrate; Sucrose Cocoate; Sugar / Sugar Derivative; Trehalose	China; European Union (EU); Japan	Organic Chemicals
3203.00.1000	Annatto; Annatto Powder Org Der; Sunflower Seed Oil / Annatto Blend		Colorants & Pigments
3203.00.8000	Annatto Colorant; Caramel; Glycerin (Pharma Grade) Blend (3 actives, in carrier); Mica-Based Color Pigment / Caramel Mica Blend	Brazil; European Union (EU)	Colorants & Pigments
3204.12.5020	Titanium Dioxide Blend (4 components)		Colorants & Pigments
3204.12.5090	Titanium Dioxide Blend (5 components)		Colorants & Pigments
3204.17.9086	Silicone (PDMS) Blend (3 components); Synthetic Organic Dye / RED 6 Blend; Synthetic Organic Dye Blend (6 actives, in carrier)		Colorants & Pigments
3204.19.1100	Green 8		Colorants & Pigments
3204.19.3500	Astaxanthin	China	Colorants & Pigments
3205.00.1500	Carmine; Iron Oxide Pigment Blend (4 components); Mica-Based Color Pigment Blend (3 actives, in carrier)	Peru	Colorants & Pigments
3205.00.4020	Color Lake Pigment; Color Lake Pigment Blend (7 actives, in carrier); Silicone (PDMS) Blend (3 components)		Colorants & Pigments
3205.00.5010	Color Lake Pigment / YELLOW 5 Blend; Color Lake Pigment / YELLOW 6 Blend; Color Lake Pigment Blend (4 components); Silicone (PDMS) Blend (3 components)		Colorants & Pigments
3205.00.5020	Color Lake Pigment / RED 33 Blend; Color Lake Pigment / RED 7 Blend; Color Lake Pigment Blend; Silicone (PDMS) Blend (3 components)		Colorants & Pigments
3205.00.5040	Color Lake Pigment / BLUE 1 Blend; Color Lake Pigment Blend; Silicone (PDMS) / Triethoxysilylethyl Polydimethylsiloxylethyl Blend		Colorants & Pigments
3206.11.0000	Cellulose Polymer Blend (6 components); Silicone (PDMS) / Titanium Dioxide Blend; Silicone (PDMS) Blend (3 components); TiO ₂ -Based Pigment Preparation; Titanium Dioxide / Aluminum Hydroxide Blend; Titanium Dioxide / Galactoarabinan Blend;		Colorants & Pigments

HTS Codes (Not Exhaustive)	Cosmetic Inputs (Not Exhaustive)	Countries (Not Exhaustive)	Category
	Titanium Dioxide / Magnesium Myristate Blend; Titanium Dioxide / Methicone Blend; Titanium Dioxide / Mica Blend; Titanium Dioxide / PF-5 Blend; Titanium Dioxide / Tin Oxide (Blend, in carrier); Titanium Dioxide / Triethoxycaprylylsilane Blend; Titanium Dioxide / Trimethylsiloxysilicate Blend; Titanium Dioxide Blend; Titanium Dioxide Pigment Preparation		
3206.19.0000	Botanical Wax / Pigment Preparation; Carmine (Cochineal Dye) Blend (4 components); Cellulose Polymer Blend (6 components); Cloisonné Blue Pigment Preparation; Color Pigment Preparation; Color Pigment Preparation Blend (7 components); Intenza Azure Allure Pigment; Intenza Firefly Pigment; Interfine Gold Pigment; Iron Oxide Pigment Blend; Iron Oxide Pigment Preparation; Iron Oxide Pigment Preparation Blend; Mystic Purple Pigment; Silicone (PDMS) (In carrier blend); Silicone (PDMS) / Mica (Blend, in carrier); Silicone (PDMS) Blend; Titanium Dioxide / Calcium Aluminum (Blend, in carrier); Titanium Dioxide / Mica (Blend, in carrier); Titanium Dioxide / Mica Blend; Titanium Dioxide / Nylon-6 (Blend, in carrier); Titanium Dioxide / Synthetic Fluorphlogopite Blend; Titanium Dioxide / Tin Oxide (Blend, in carrier); Titanium Dioxide / Tin Oxide Blend; Titanium Dioxide Blend; Triethoxycaprylylsilane		Colorants & Pigments
3206.20.0050	Mica-Based Color Pigment Blend (3 components)		Colorants & Pigments
3206.41.0000	Mica-Based Color Pigment Blend (3 components); Ultramarine Blue Pigment; Ultramarine Pigment		Colorants & Pigments
3206.49.1000	Iron Oxide Pigment Preparation Blend (5 components); PVP (Polymer) Blend (4 components); Silicone (PDMS) Blend (3 components)		Colorants & Pigments
3206.49.2000	Color Pigment Preparation Blend (3 components); Iron Oxide (Silicone-Treated) / Methicone Blend; Iron Oxide (Silicone-Treated) / Trimethylsiloxysilicate Blend; Iron Oxide (Silicone-Treated) Blend (3 components); Iron Oxide (Surface-Treated) / Isopropyl Titanium Blend; Iron Oxide (Surface-Treated) Blend (4 components); Iron Oxide / Mica Pigment / Iron Oxides (Blend, in carrier); Iron Oxide / Mica Pigment / Iron Oxides Blend; Iron		Colorants & Pigments

HTS Codes (Not Exhaustive)	Cosmetic Inputs (Not Exhaustive)	Countries (Not Exhaustive)	Category
	Oxide / Mica Pigment / Mica Blend; Iron Oxide / Silica Pigment / Syn. Fluorphlogopite (Blend, in carrier); Iron Oxide / Silica Pigment / Synthetic Fluorphlogopite (Blend, in carrier); Iron Oxide / Silica Pigment Blend (3 actives, in carrier); Iron Oxide / Syn. Mica Pigment / Synthetic Fluorphlogopite Blend; Iron Oxide Pigment; Iron Oxide Pigment / Aluminum Calcium (Blend, in carrier); Iron Oxide Pigment / Calcium Sodium Blend; Iron Oxide Pigment / Isopropyl Titanium Blend; Iron Oxide Pigment Blend; Iron Oxide Pigment Preparation; Iron Oxide Pigment Preparation / Red Iron Blend; Iron Oxide Pigment Preparation / Yellow Iron Blend; Iron Oxide Pigment Preparation Blend; TiO ₂ / Cellulose Pigment / Titanium Dioxide Blend		
3206.49.3000	Zinc Oxide Pigment Blend (3 components)		Colorants & Pigments
3206.49.6050	Aluminum Calcium Sodium Silicate / Iron Oxides; Aluminum Calcium Sodium Silicate / TiO ₂ / Carmine / Tin Oxide; Aluminum Calcium Sodium Silicate / TiO ₂ / Ferric Ferrocyanide / Tin Oxide; Aluminum Calcium Sodium Silicate / TiO ₂ / Tin Oxide; Aluminum Calcium Sodium Silicate / TiO ₂ / Titanium / Tin Oxide; Bismuth Oxychloride / Mica / Ultramarines; Bismuth Oxychloride Pearl / Ethylhexyl Hydroxystearate Blend; Black 2; Blend of Mica (And) Titanium Dioxide; Bronze Powder; Ca Al Borosilicate / TiO ₂ ; Ca Al Borosilicate / TiO ₂ / Carmine / Tin Oxide; Ca Al Borosilicate / TiO ₂ / Iron Oxides / Tin Oxide; Ca Al Borosilicate / TiO ₂ / Red 28, etc.; Ca Al Borosilicate / TiO ₂ / Tin Oxide; Ca Al Borosilicate / TiO ₂ / Tin Oxide / Ferric Ferrocyanide; Ca Al Borosilicate / TiO ₂ / Yellow 5 / Tin Oxide; Ca Na Borosilicate / Iron Oxides; Ca Na Borosilicate / Iron Oxides / TiO ₂ / Tin Oxide; Ca Na Borosilicate / TiO ₂ / Tin Oxide; Color Pigment Preparation (In carrier blend); Copper Powder; Iron Oxide (Surface-Treated) Blend (4 actives, in carrier); Iron Oxide Pigment Blend; Iron Oxides / Mica; Iron Oxides / Mica / TiO ₂ ; Mica / Bismuth Oxychloride / Chromium Oxide; Mica / Iron Oxides; Mica / Iron Oxides / TiO ₂ ; Mica / TiO ₂ ;	Canada; China; European Union (EU); India; Indonesia; Israel; Japan; Mexico; South Korea; Switzerland; United Kingdom	Colorants & Pigments

HTS Codes (Not Exhaustive)	Cosmetic Inputs (Not Exhaustive)	Countries (Not Exhaustive)	Category
	Mica / TiO ₂ / Carmine; Mica / TiO ₂ / Ferric Ferrocyanide; Mica / TiO ₂ / Iron Oxides; Mica / TiO ₂ / Iron Oxides / Tin Oxide; Mica / TiO ₂ / Iron Oxides, etc.; Mica / TiO ₂ / Tin Oxide; Mica Pigment Blend; Pearlizer; Syn. Fluorphlogopite; Syn. Fluorphlogopite / Iron Oxides; Syn. Fluorphlogopite / Iron Oxides / TiO ₂ ; Syn. Fluorphlogopite / Iron Oxides / TiO ₂ / Tin Oxide; Syn. Fluorphlogopite / TiO ₂ ; Syn. Fluorphlogopite / TiO ₂ / Carmine / Tin Oxide; Syn. Fluorphlogopite / TiO ₂ / Iron Oxides / Carmine; Syn. Fluorphlogopite / TiO ₂ / Iron Oxides / Tin Oxide; Syn. Fluorphlogopite / TiO ₂ / Iron Oxides, etc.; Syn. Fluorphlogopite / TiO ₂ / Tin Oxide; Syn. Fluorphlogopite / TiO ₂ / Titanium; Syn. Fluorphlogopite / TiO ₂ / Yellow 5 / Tin Oxide; TiO ₂ ; TiO ₂ / Ca Al Borosilicate; TiO ₂ / Iron Oxides / Magnesium Stearate; TiO ₂ / Mica; TiO ₂ / Mica / Chromium Oxide; TiO ₂ / Mica / Iron Oxides; TiO ₂ / Mica / Iron Oxides / Tin Oxide; TiO ₂ / Mica / Tin Oxide; TiO ₂ / Red 30 Lake / Magnesium Stearate; TiO ₂ / Syn. Fluorphlogopite / Ferric Ferrocyanide, etc.; TiO ₂ / Tin Oxide		
3301.12.0000	Citrus Aurantium Amara (Bitter Orange) Flower Oil; Citrus Aurantium Amara (Bitter Orange) Leaf/Twig Oil; Citrus Aurantium Amara (Bitter Orange) Peel Extract; Citrus Aurantium Amara (Bitter Orange) Peel Oil; Citrus Essential Oil; Citrus Nobilis (Mandarin Orange) Peel Oil; Orange Essential Oil	Brazil; Egypt; European Union (EU); Morocco; Paraguay	Essential Oils & Fragrances
3301.13.0000	Citrus Aurantifolia (Lime) Oil; Citrus Limon (Lemon) Peel Oil; Lemon Essential Oil	Argentina; European Union (EU); Mexico	Essential Oils & Fragrances
3301.19.1000	Citrus Aurantium Amara (Bitter Orange) Peel Oil		Essential Oils & Fragrances
3301.19.5110	Citrus Aurantium Bergamia (Bergamot) Fruit Oil; Orange Essential Oil	European Union (EU)	Essential Oils & Fragrances
3301.19.5120	Citrus Aurantifolia (Lime) Oil; Citrus Aurantifolia (Lime) Peel Oil; Essential Oil (Carrier blend); Lime Essential Oil		Essential Oils & Fragrances
3301.19.5150	Citrus Aurantium Amara (Bitter Orange) Peel Oil; Citrus Nobilis (Mandarin Orange) Peel Oil; Citrus Reticulata (Mandarin) Oil; Tangerine Essential Oil	Argentina; Brazil; European Union (EU); Israel; Mexico	Essential Oils & Fragrances

HTS Codes (Not Exhaustive)	Cosmetic Inputs (Not Exhaustive)	Countries (Not Exhaustive)	Category
3301.24.0000	Mentha Piperita (Peppermint) Oil	European Union (EU)	Essential Oils & Fragrances
3301.25.0020	Mentha Viridis (Spearmint) Leaf Oil		Essential Oils & Fragrances
3301.29.1000	Eucalyptus Citriodora Oil; Eucalyptus Essential Oil; Eucalyptus Globulus Leaf Oil; Eucalyptus Oil	China; European Union (EU)	Essential Oils & Fragrances
3301.29.2000	Iris Germanica Root Extract		Essential Oils & Fragrances
3301.29.5103	Illicium Verum (Anise) Fruit/Seed Oil; Pimpinella Anisum (Anise) Seed Oil	Egypt	Essential Oils & Fragrances
3301.29.5105	Carum Carvi (Caraway) Fruit Oil		Essential Oils & Fragrances
3301.29.5107	Cinnamomum Cassia (Cinnamon) Oil	Switzerland	Essential Oils & Fragrances
3301.29.5109	Cedrus Atlantica Bark Oil; Eugenia Caryophyllus (Clove) Flower Oil	Madagascar	Essential Oils & Fragrances
3301.29.5111	Cymbopogon Nardus (Citronella) Oil	Indonesia	Essential Oils & Fragrances
3301.29.5113	Eugenia Caryophyllus (Clove) Bud Oil; Eugenia Caryophyllus (Clove) Flower Oil; Eugenia Caryophyllus (Clove) Stem Oil	Indonesia; Madagascar	Essential Oils & Fragrances
3301.29.5116	Geranium Maculatum Oil; Pelargonium Graveolens Flower Oil	Egypt; European Union (EU)	Essential Oils & Fragrances
3301.29.5117	Jasmine Egyptian Flower Wax; Jasminum Grandiflorum (Jasmine) Flower Extract; Jasminum Officinale (Jasmine) Oil; Jasminum Sambac (Jasmine) Flower Extract	Egypt; European Union (EU); India; South Africa	Essential Oils & Fragrances
3301.29.5118	Lavandula Angustifolia (Lavender) Oil; Lavandula Hybrida Oil; Lavender Essential Oil; Lavender Essential Oil / Lavandula Hybrida Oil Blend	European Union (EU); Ukraine	Essential Oils & Fragrances
3301.29.5119	Cymbopogon Flexuosus Oil; Cymbopogon Schoenanthus Oil	India	Essential Oils & Fragrances
3301.29.5121	Aniba Rosodora (Rosewood) Wood Oil		Essential Oils & Fragrances
3301.29.5125	Myristica Fragrans (Nutmeg) Kernel Oil; Myristica Fragrans (Nutmeg) Shell Powder	Indonesia	Essential Oils & Fragrances

HTS Codes (Not Exhaustive)	Cosmetic Inputs (Not Exhaustive)	Countries (Not Exhaustive)	Category
3301.29.5129	Pogostemon Cablin Oil	European Union (EU); India; Indonesia; Madagascar	Essential Oils & Fragrances
3301.29.5133	Citrus Aurantium Amara (Bitter Orange) Leaf/Twig Oil; Citrus Limon (Lemon) Leaf Oil; Petitgrain Citronier; Petitgrain Citronnier Essential Oil	European Union (EU)	Essential Oils & Fragrances
3301.29.5135	Rosa Damascena Extract; Rosa Damascena Flower Water; Rose Essential Oil; Rose Flower Oil	Turkey	Essential Oils & Fragrances
3301.29.5137	Rosemary Essential Oil; Rosmarinus Officinalis (Rosemary) Leaf Oil	Egypt; European Union (EU); Morocco; South Africa; Tunisia	Essential Oils & Fragrances
3301.29.5139	Fusanus Spicatus Wood Oil; Santalum Album (Sandalwood); Santalum Album (Sandalwood) Oil; Santalum Austrocaledonicum Wood Oil	Australia	Essential Oils & Fragrances
3301.29.5142	Vetiver Fragrance Compound; Vetiveria Zizanioides Root Oil	Haiti	Essential Oils & Fragrances
3301.29.5143	Cananga Odorata Flower Oil	European Union (EU); Indonesia; Madagascar	Essential Oils & Fragrances
3301.29.5150	Abies Balsamea (Balsam Canada) Resin; Angelica Archangelica Root Extract; Angelica Archangelica Seed Oil; Aniba Rosodora (Rosewood) Wood Oil; Anthemis Nobilis Flower Extract; Anthemis Nobilis Flower Oil; Apium Graveolens (Celery) Seed Oil; Aquilaria Agallocha Wood Oil; Artemisia Herba-Alba Oil; Artemisia Pallens Flower Oil; Artemisia Pallens Flower/Leaf/Stem Oil; BASIL; Backhousia Citriodora Leaf Oil; Basil Essential Oil; Betula Alba Oil; Boswellia Carterii Resin Extract; Bulnesia Sarmientoi Wood Oil; Canarium Commune Gum Oil; Cedrus Atlantica Bark Oil; Chamomilla Recutita (Matricaria) Flower Oil; Cinnamomum Camphora (Camphor) Branch/Leaf Extract; Cinnamomum Cassia Leaf Oil; Cinnamomum Zeylanicum Leaf Oil; Cistus Ladaniferus Oil; Citrus Aurantifolia (Lime) Peel Oil; Citrus Aurantium Amara (Bitter Orange) Flower Oil; Citrus Aurantium Amara (Bitter Orange) Peel Oil; Citrus Aurantium	Australia; Belize; Brazil; Chile; China; Dominican Republic; Egypt; European Union (EU); Guatemala; Haiti; India; Indonesia; Jamaica; Kenya; Laos; Madagascar; Mexico; Morocco; Namibia; Nepal; New Caledonia; New Zealand; Paraguay; Philippines; South Africa; Sri Lanka;	Essential Oils & Fragrances

HTS Codes (Not Exhaustive)	Cosmetic Inputs (Not Exhaustive)	Countries (Not Exhaustive)	Category
	<p>Dulcis (Orange) Flower Extract; Citrus Reticulata (Tangerine) Peel Oil; Cocoa Seed Extract; Commiphora Myrrha Oil; Commiphora Wildii Oil; Coriandrum Sativum (Coriander) Fruit Oil; Coriandrum Sativum (Coriander) Fruit/Leaf Extract; Coriandrum Sativum (Coriander) Seed Oil; Cuminum Cyminum (Cumin) Seed Oil; Cupressus Sempervirens Leaf/Nut/Stem Oil; Cupressus Sempervirens Oil; Cymbopogon Flexuosus Oil; Cymbopogon Martini Oil; Cymbopogon Nardus (Citronella) Oil; Daucus Carota Sativa (Carrot) Seed Oil; Dipteryx Odorata Seed Extract; Elemi Oil; Elettaria Cardamomum Seed Extract; Elettaria Cardamomum Seed Oil; Essential Oil; Essential Oil / Rehmannia Chinensis Blend; Eucalyptus Citriodora Oil; Eucalyptus Dives (Piperitol); Evernia Prunastri (Oakmoss) Extract; Ferula Galbaniflua (Galbanum) Resin Oil; Fucus Vesiculosus Extract; Fusanus Spicatus Wood Oil; Geranium Maculatum Oil; Guaicwood Oil; Helichrysum Angustifolium Flower Extract; Helichrysum Angustifolium Flower Oil; Helichrysum Gymnocephalum; Hibiscus Abelmoschus Extract; Hibiscus Abelmoschus Seed Oil; Honey Myrtle; Hyssopus Officinalis Leaf Oil; Illicium Verum (Anise) Fruit/Seed Oil; Kaempferia Galanga Root Extract; Kunzea Ambigua Branch/Leaf/Twig Oil; Leptospermum Petersonii Oil; Leptospermum Scoparium Branch/Leaf Oil; Linalool; Lippia Sidoides Leaf Oil; Melaleuca Alternifolia (Tea Tree) Leaf Oil; Melaleuca Leucadendron Cajaput Oil; Melaleuca Viridiflora Leaf Oil; Myristica Fragrans (Nutmeg) Kernel Oil; Myroxylon Pereirae (Balsam Peru) Resin; Myrtus Communis Oil; Ocimum Basilicum (Basil) Oil; Olibanum; Origanum Heracleoticum Flower Oil; Origanum Majorana Leaf Oil; Ormenis Multicaulis Oil; Pimenta Officinalis (Pimento) Leaf Oil; Pine Needle Absolute; Pinus Sylvestris Bud Extract; Piper Nigrum (Black Pepper) Fruit Oil; Polygonum Odoratum Oil; Rose Flower Oil; Salvia Officinalis (Sage) Oil; Salvia Sclarea (Clary) Oil; Santalum Album (Sandalwood) Oil; Santalum Austrocaledonicum Wood Oil; Tarragon Oil; Tea Tree Oil; Thyme Oil; Thymus Capitatus (Oregano) Oil; Thymus Mastichina Flower Oil; Thymus Vulgaris</p>	<p>Switzerland; Thailand; Turkey; Vietnam</p>	

HTS Codes (Not Exhaustive)	Cosmetic Inputs (Not Exhaustive)	Countries (Not Exhaustive)	Category
	(Thyme) Oil; Trigonella Foenum-Graecum Seed Extract; Vanilla Planifolia Fruit Extract; Vetiveria Zizanioides Root Oil; Viola Odorata Leaf Extract; Vitis Vinifera (Grape) Leaf Extract; Vitis Vinifera (Grape) Leaf Oil; Zingiber Cassumunar Root Oil; Zingiber Officinale (Ginger) Root Extract; Zingiber Officinale (Ginger) Root Oil		
3301.30.0000	Benzoin Essential Oil / Styrax Tonkinensis Blend; Botanical Absolute; Canarium Luzonicum Gum Nonvolatiles; Cistus Labdanum Resinoid; Cistus Ladaniferus Resin; Ferula Galbaniflua (Galbanum) Resin Oil; Resinoid/Oleo-resin; Resinoid/Oleo-resin / Tonka Blend	European Union (EU); Madagascar	Essential Oils & Fragrances
3301.90.5000	Anthemis Nobilis Flower Extract; Essential Oil Terpenic By-Product (In carrier blend); Fragrance Concentrate/Terpenic; Infusions of Myrtus Communis; Lavandula Angustifolia (Lavender) Flower/Leaf/Stem Extract; Myrtle Essential Oil; Rosa Damascena Extract; Rosa Damascena Flower Water; Rosmarinus Officinalis (Rosemary) Leaf Extract; Salvia Officinalis (Sage) Leaf Water; Sasa Kurilensis Water	European Union (EU); Japan	Essential Oils & Fragrances
3302.90.1000	Essential Oil Mixture (Eucalyptol/Limonene)	India	Essential Oils & Fragrances
3302.90.1050	Fragrance; Fragrance Compound / Amyl Salicylate Blend; Fragrance Compound / Vanilla Planifolia Blend; Fragrances & Flavours; Methyl Anthranilate; Mimosa Tenuiflora Bark Extract	China; European Union (EU); India; Indonesia	Essential Oils & Fragrances
3302.90.2050	Cinnamyl Alcohol; Fragrance Compound; Fragrance Mixture (Industrial Grade)		Essential Oils & Fragrances
3303.00.3000	Perfume/Toilet Water		Essential Oils & Fragrances
3304.10.0000	Lip make-up preparations	China; European Union (EU)	Essential Oils & Fragrances
3304.20.0000	Eye make-up preparations	European Union (EU); South Korea	Essential Oils & Fragrances
3304.91.0010	Rouges	Japan	Essential Oils & Fragrances

HTS Codes (Not Exhaustive)	Cosmetic Inputs (Not Exhaustive)	Countries (Not Exhaustive)	Category
3304.91.0050	Cosmetic Powder Preparation	China; European Union (EU); South Korea	Essential Oils & Fragrances
3304.99.5000	Adhesive Bandage; Cosmetic Preparation; Finished Products	China; European Union (EU); Mexico; South Korea	Essential Oils & Fragrances
3305.30.0000	Hair Care Preparation	Mexico	Essential Oils & Fragrances
3307.20.0000	Personal Care Preparation; Personal deodorants and antiperspts	Canada; Japan; Mexico; Philippines	Essential Oils & Fragrances
3401.19.9000	Soap/Cleanser (Chip Form)	Indonesia; Malaysia; Philippines	Surfactants & Soap
3401.20.2000	Soap/Cleanser	Indonesia; Malaysia; Philippines	Surfactants & Soap
3402.11.5000	Anionic Surfactant	Mexico	Surfactants & Soap
3402.13.2010	Laureth-6	China; European Union (EU); India	Surfactants & Soap
3402.31.9000	Anionic Surfactant	Indonesia	Surfactants & Soap
3402.39.1000	Anionic Surfactant	Indonesia	Surfactants & Soap
3402.39.9000	Amidoamine Surfactant; Sodium Cocoyl Isethionate; Surfactant (Multi-Component)	Indonesia; Malaysia; Philippines	Surfactants & Soap
3402.39.9010	Sodium Laureth Sulfate		Surfactants & Soap
3402.39.9050	Anionic Surfactant (Other); Macadamia Seed Oil Polyglyceryl-6 Esters Behenate; Surfactant / Grape Blend	Indonesia; Japan	Surfactants & Soap
3402.41.1000	Cationic Surfactant (Aromatic)	Mexico	Surfactants & Soap
3402.42.0000	Laureth-6	China; European Union (EU); India	Surfactants & Soap
3402.42.1000	Nonionic Surfactant (Aromatic)	Indonesia; Malaysia; Philippines	Surfactants & Soap
3402.42.2000	Nonionic Surfactant (Fatty Substance)	Indonesia; Malaysia; Philippines	Surfactants & Soap
3402.42.2010	PEG-8 Beeswax		Surfactants & Soap
3402.42.2020	Surfactant (In carrier blend)		Surfactants & Soap

HTS Codes (Not Exhaustive)	Cosmetic Inputs (Not Exhaustive)	Countries (Not Exhaustive)	Category
3402.42.2050	Macadamia Polyglyceryl Ester Surfactant; Stearalkonium Chloride; Surfactant / Cetearyl Wheat Blend; Surfactant / Stearalkonium Chloride Blend; Surfactant Blend (3 components)		Surfactants & Soap
3402.42.9000	Nonionic Surfactant (Other)	Indonesia; Malaysia; Philippines	Surfactants & Soap
3402.49.1000	Other Surfactant (Aromatic)	Indonesia	Surfactants & Soap
3402.49.9000	Betaine Surfactant	Indonesia; Malaysia; Philippines	Surfactants & Soap
3402.90.1000	Surfactant Preparation (Aromatic)	Indonesia	Surfactants & Soap
3402.90.5050	Surfactant Preparation; Surfactants	China; European Union (EU); India; Taiwan	Surfactants & Soap
3404.90.1000	Artificial Wax	Indonesia	Surfactants & Soap
3404.90.5110	Artificial Wax; Castor Isostearate Beeswax Succinate; PEG-8 Beeswax; Wax (PE 400 - deodorant/antiperspt component)	Canada; European Union (EU); India; Indonesia	Surfactants & Soap
3404.90.5150	Artificial Wax Blend (3 components); Beeswax; Blend of Cetearyl Alcohol (And) Coco-Glucoside; Polyglyceryl-3 Beeswax	European Union (EU)	Surfactants & Soap
3503.00.8000	Catalent - Gelatin	Brazil	Proteins, Enzymes & Modified Starches
3504.00.5000	Hydrolyzed Collagen; Hydrolyzed Soy Protein; Protein; Protein / Hydrolyzed Wheat Protein (Blend, in carrier); Protein Blend (3 components); Silk Powder; Wheat Amino Acids	Canada; United Kingdom	Proteins, Enzymes & Modified Starches
3505.10.0020	Dextrin Palmitate	Japan	Proteins, Enzymes & Modified Starches
3505.10.0040	Aluminum Starch Octenylsuccinate	Brazil	Proteins, Enzymes & Modified Starches
3507.90.7000	Enzyme / Glucose Oxidase (Blend, in carrier); Enzymes; Ethylbisiminomethylguaicol Manganese Chloride	China; European Union (EU)	Proteins, Enzymes & Modified Starches
3808.90.3000	Biocide/Preservative; Polyaminopropyl Biguanide	Canada; China; Mexico; Switzerland	Industrial Fatty Chemicals
3808.99.3000	Biocide/Preservative	China; European Union (EU); India; Taiwan	Industrial Fatty Chemicals

HTS Codes (Not Exhaustive)	Cosmetic Inputs (Not Exhaustive)	Countries (Not Exhaustive)	Category
3808.99.9501	Hydrogen Peroxide	China; European Union (EU); India; Taiwan	Industrial Fatty Chemicals
3812.19.2000	Antioxidant/Stabilizer		Industrial Fatty Chemicals
3815.11.0000	Chemical Ingredient	European Union (EU)	Industrial Fatty Chemicals
3823.11.0000	Stearic Acid	Indonesia; Malaysia; Philippines	Industrial Fatty Chemicals
3823.19.1900	Distilled Coconut Fatty Acid; Distilled Fatty Acid Mixture; Industrial Fatty Acid Blend; Industrial Fatty Acid Mixture; Industrial Fatty Chemical Blend (3 components)	Indonesia; Malaysia; Philippines	Industrial Fatty Chemicals
3823.19.2000	Coconut/Palm Fatty Acid (Industrial); Distilled Coconut Fatty Acid; Fatty Acid; Industrial Fatty Chemical (CNFA Mix)	Indonesia; Malaysia; Philippines	Industrial Fatty Chemicals
3823.19.4000	Industrial Fatty Chemical (Palm Kernel-Derived)	Indonesia	Industrial Fatty Chemicals
3823.70.4000	Cetearyl Alcohol	Indonesia; Malaysia; United Kingdom	Industrial Fatty Chemicals
3823.70.6000	Industrial Fatty Alcohol	Indonesia	Industrial Fatty Chemicals
3823.70.9000	Industrial Fatty Alcohol	Indonesia; Malaysia	Industrial Fatty Chemicals
3824.99.2900	Covi- OX T 50 C (Chemical Prep.) (Carrier blend); Emulsion/Emulsifier; Ethylhexyl Methoxycinnamate/Silica/PVP / PVP (Blend, in carrier); OxyneX ST Liquid Antioxidant (Chemical Prep.) (In carrier blend); Tocobiol (Chemical Prep.) (Carrier blend)		Industrial Fatty Chemicals
3824.99.3990	Iron Oxide / Mica Pigment Blend (3 actives, in carrier); Laponite-Xls XR (Chemical Prep.) / Lithium Magnesium Blend; Miyohaze SM (Chemical Prep.) (In carrier blend); NS Coated TIO2 Str-100C-LF (Chemical Prep.) Blend (3 components); SM-4000 R (Chemical Prep.) (In carrier blend); Soft Vision Z (Chemical Prep.) / Titanium Dioxide (Blend, in carrier); Velvetveil A (Chemical Prep.) (In carrier blend)		Industrial Fatty Chemicals

HTS Codes (Not Exhaustive)	Cosmetic Inputs (Not Exhaustive)	Countries (Not Exhaustive)	Category
3824.99.4100	Fatty Substance Mixture (Animal/Vegetable Origin)	China	Industrial Fatty Chemicals
3824.99.4140	Glyceryl Behenate/Eicosadioate; Hydroxystearic/Linolenic/Oleic Polyglycerides; Phytosterols; Polyglyceryl-10 Behenate/Eicosadioate; Premier Betula Vitamin F Forte (Chemical Prep.) Blend (3 components); Purified Ester Gum M.O.D. (Chemical Prep.) / Glyceryl Rosinate; Sepinov Emt 10 (Chemical Prep.) Blend (3 components); Sucrose Cocoate		Industrial Fatty Chemicals
3824.99.4190	Avocadin HU 25 (Chemical Prep.) Blend (3 components); COSMOSURF M (Chemical Prep.); Carnauba Butter (Chemical Prep.) Blend (6 actives, in carrier); K3 EL-SP-350 (Chemical Prep.); Promolift Mbal (Chemical Prep.) Blend (4 actives, in carrier); Triticum Vulgare (Wheat) Flour Lipids; Vitamin F Forte (Chemical Prep.) / Linoleic Acid Blend; Zinc Stearate		Industrial Fatty Chemicals
3824.99.4900	Distinctive Gel ID (Chemical Prep.) / Carbonate (Blend, in carrier); Emulsion/Emulsifier Blend (3 actives, in carrier)		Industrial Fatty Chemicals
3824.99.5000	Chemical Preparation (Industrial)	Indonesia	Industrial Fatty Chemicals
3824.99.9300	Chemical Preparation (NESOI)	Indonesia; Malaysia; Philippines	Industrial Fatty Chemicals
3824.99.9397	A Phytoclar II BG Nextgen (Chemical Prep.) Blend (3 components); A Phytoclar II-J BG AF (Chem. Prep.) Blend (3 components); A Phytowhite (Chemical Prep.) Blend (3 components); ASI TALC JA-46R; Alcohol Mixture (NESOI); Algae Oil (Chem. Prep.) / Grape Blend; Aloe Barbadensis Leaf Extract; Amino Acid Complex B (Chem. Prep.) Blend (14 components); Annatto Liquid Extract (Chem. Prep.) Blend (3 actives, in carrier); Asi Sericite Gms-4C (Chem. Prep.) Blend (4 components); Avocadin HU80 (Chem. Prep.) / Phytosterols Blend; Bentone Luxe XO CG (Chem. Prep.) Blend (3 components); Beracare Triple A System (Chem. Prep.) Blend (3 components); Biobenefit (Chemical Prep.) (In carrier blend); Botanpi Liquid B (Chem. Prep.) (In carrier blend); Buckwheat Wax (Chem. Prep.) (In carrier blend); CARROT OLEORESIN 0.2% (Chemical Prep.); CL Lip Plumper (Chem. Prep.) Blend (3	Indonesia	Industrial Fatty Chemicals

HTS Codes (Not Exhaustive)	Cosmetic Inputs (Not Exhaustive)	Countries (Not Exhaustive)	Category
	<p>components); COLA1 2X (Chem. Prep.) Blend (3 actives, in carrier); Calendula Oil Clr (Chem. Prep.) (In carrier blend); Callicarpa Japonica Fruit Extract; Calmberry (Chem. Prep.) / Raspberry (Blend, in carrier); Capixyl (Chemical Prep.) Blend (3 actives, in carrier); Caprylic/Capric Triglyceride; Cili Extract BG (Chemical Prep.) (In carrier blend); Clairju (Chemical Prep.) / Butlene Glycol (Blend, in carrier); Coconut Water Herbasome (Chem. Prep.) (In carrier blend); Coral Grass (Chem. Prep.) (In carrier blend); DISTINCTIVE GEL FL (Chemical Prep.); Derm Src PF (Chem. Prep.) Blend (3 actives, in carrier); Di- Dimethicone Treated Talc; Dimethicone PEG-8 Polyacrylate; Disteardimonium Hectorite (In carrier blend); Distinctive Coconut Water Clear (Chemical Prep.) / Endosperm (Blend, in carrier); Dry Skin Extract Mix (Chem. Prep., 3 components); Ecogel (Chem. Prep.) Blend (3 actives, in carrier); Elc Noni Fruit Extract IN BG (Chemical Prep.) (In carrier blend); Emotion Skin (Chem. Prep.) Blend (3 components); Emulsion Blend (5 actives, in carrier); Emulsion/Emulsifier / Acetyl Carnitine HCl Blend; Energen (Chem. Prep.) Blend (3 actives, in carrier); Estogel M (Chemical Prep.) / Castor Oil (Blend, in carrier); Extract BG OF Hawthorn (Chemical Prep.) (In carrier blend); Fiberlon 361 T (Chem. Prep.) / Nylon-6 Blend; Frametime Cxg (Chemical Prep.) / Bentonite (Blend, in carrier); Glycosphere-Pco G2 PF (Chem. Prep.) Blend (4 actives, in carrier); Grasnow AE (Chem. Prep.) (In carrier blend); Gwennis G (Chem. Prep.) (In carrier blend); Gyokuro Extract (Chem. Prep.) (In carrier blend); Haloxyl PH Mbal (Chem. Prep.) Blend (4 actives, in carrier); Heather Extract AQ R (Chem. Prep.) (In carrier blend); Hibisglow (Chem. Prep.) (In carrier blend); Hibisglow (Chem. Prep.) / Yeast Extract (Blend, in carrier); Hydraprotectol SM2 PH (Chem. Prep.) / Vegetable Protein Blend; Hydresia G2 (Chemical Prep.) (In carrier blend); Hydrosella (Chem. Prep.) / Erythritol (Blend, in carrier); Instalift Goji (Chemical Prep.) (In carrier blend); Jeju Love Plant (Chem. Prep.) (In carrier blend); Kahlresin 5723 MB (Chem. Prep.) (In carrier blend); L Cytovector Anti-OX (Chem. Prep.) Blend (5 actives, in</p>		

HTS Codes (Not Exhaustive)	Cosmetic Inputs (Not Exhaustive)	Countries (Not Exhaustive)	Category
	<p>carrier); LAVENDER HONEY AUS IN BG (Chem. Prep.); Lachestim (Chemical Prep.) (In carrier blend); Leontocell LY (Chem. Prep.) (In carrier blend); Lipmoist Molecular Film Cpe (Chem. Prep.) Blend (4 actives, in carrier); Lipolight Oap/Pva (Chem. Prep.) / Pva Blend; Lipovol Mos-70 (Chemical Prep.) Blend (3 components); Luviskol K90 AT1 Sol. 20% (Chem. Prep.) (In carrier blend); Lycopure (Chem. Prep.) / Tomato (Blend, in carrier); Micromerol W (Chemical Prep.) (In carrier blend); Miglyol Gel B (Chem. Prep.) Blend (4 components); Mirustyle Mfp PE (Chem. Prep.) / Hydroxypropyltrimonium Hydrolyzed Blend; Morinda Jusu (Chemical Prep.) (In carrier blend); Mss-500/5H-SH (Chem. Prep.) (In carrier blend); Native Essence (Chemical Prep.) Blend (3 components); Natural Wax Jelly Usp/ SP511 EL (Chem. Prep.) Blend (4 components); Net Abha (Chem. Prep.) Blend (5 components); Net-Lcs (Chemical Prep.) Blend (4 actives, in carrier); Nopa Skin NC06 (Chem. Prep.) (In carrier blend); Nova Vita NC25 (Chem. Prep.) (In carrier blend); Nymphaea Caerulea Flower Extract; OILKEMIA 5S (Chem. Prep.); ON60TEL (Chem. Prep.) Blend (4 actives, in carrier); Oleaphycol CM (Chemical Prep.) (In carrier blend); Oli'Vine ST (Chem. Prep.) (In carrier blend); Omega 3/5 Cosmetic Oil Mix (Chem. Prep., 3 actives, in carrier); POTASSIUM CHOLESTEROL SU (Chem. Prep.); Photozomes Mix II Mpf (Chem. Prep.) Blend (3 actives, in carrier); Phyllanthus Emblica Fruit Extract; Plandool G (Non-Gmo) (Chem. Prep.) Blend (4 components); Recoverine- EL (Chemical Prep.) (In carrier blend); Retinol 50 C (Chem. Prep.) Blend (3 actives, in carrier); Retinyl Palmitate / Corn Oil / BHT / BHA Blend; Rice Defense Complex R (Chem. Prep.) (In carrier blend); Rosamox Liquid (Chem. Prep.) (In carrier blend); S Face VL-212 (Chem. Prep.) Blend (4 components); SANSURF POLYETHYLENE PF (Chem. Prep.); SP Crothix Liquid Mbal-LQ (Chem. Prep.) Blend (3 actives, in carrier); SWISS GLACIAL WATER COR-57 (Chem. Prep.); Scb Manuka Honey MB (Chem. Prep.) Blend (3 actives, in carrier); Sensomer CI-50 Polymer (Chem. Prep.) Blend (3 actives, in carrier); Sepicalm VG WP</p>		

HTS Codes (Not Exhaustive)	Cosmetic Inputs (Not Exhaustive)	Countries (Not Exhaustive)	Category
	(Chem. Prep.) Blend (3 actives, in carrier); Sericite AS R0434 (Chem. Prep.) / Mica Blend; Sericite SL-012 (Chem. Prep.) / Mica Blend; Sericite Stnp-S-100 (Chem. Prep.) / Mica Blend; Siegesbeckia PH (Chem. Prep.) (In carrier blend); Silicone Blend; Siligel (Chem. Prep.) / Sclerotium Gum (Blend, in carrier); Simulgel 600 (Chem. Prep.) / Isohexadecane (Blend, in carrier); Simulgel NS (Chem. Prep.) / Hydroxyethyl Acrylate (Blend, in carrier); Skin Extract Mix (Chem. Prep., 3 actives, in carrier); Sol Peptide (Chem. Prep.) (In carrier blend); Spheracite (Chem. Prep.) / Mica Blend; Statis G (Chem. Prep.) / Vulgare Flower/Leaf/Stem (Blend, in carrier); Sucragel AP V2 (Chem. Prep.) (In carrier blend); Symrelief 100 (Chem. Prep.) / Ginger Blend; Tagra Beads 200 MB (Chemical Prep.) Blend (7 components); Titanium Dioxide Disp. CE45S4 (Chemical Prep.) Blend (4 components); Titanium Dioxide SI-Uftr-Z (Chem. Prep.) / Methicone Blend; Tuberlux (Chem. Prep.) (In carrier blend); UNITAMURON BG-22 (Chem. Prep.); UV Mica-03 (Chem. Prep.) / Synthetic Fluorphlogopite Blend; Unispheres Ofcm-854SC (Chem. Prep.) Blend (8 actives, in carrier); Unisurrection S-61 (Chemical Prep.) Blend (4 actives, in carrier); Vaccinium Myrtillus Seed Oil; Wildflower Honey Aus IN BG (Chemical Prep.) Blend (3 actives, in carrier); Wonder Flame 10% (Chem. Prep.) (In carrier blend); Zenigloss S (Chemical Prep.) Blend (4 components)		
3901.20.0000	HDPE Resin (Packaging Feedstock)	Canada; Japan; Mexico; Vietnam	Polymers & Film Formers
3901.20.5000	Polyethylene	Japan	Polymers & Film Formers
3901.90.5501	Ethylene/Acrylic Acid Copolymer	Japan	Polymers & Film Formers
3902.10.0000	Polypropylene Homopolymer Resin	Canada; China; Mexico; South Korea; Vietnam	Polymers & Film Formers

HTS Codes (Not Exhaustive)	Cosmetic Inputs (Not Exhaustive)	Countries (Not Exhaustive)	Category
3902.20.5000	Hydrogenated Polyisobutene; Polyisobutene; Polymer / Hydrogenated Polyisobutene Blend	European Union (EU); Japan; United Kingdom	Polymers & Film Formers
3902.30.0000	Polypropylene Copolymer Resin	Canada; China; Mexico; South Korea; Vietnam	Polymers & Film Formers
3902.90.0010	Polybutene; Polymer Blend (3 actives, in carrier)		Polymers & Film Formers
3902.90.0050	Polybutene; Polydecene	Canada; European Union (EU)	Polymers & Film Formers
3904.61.0090	PTFE		Polymers & Film Formers
3905.30.0000	Polyvinyl Alcohol	China; India; Japan	Polymers & Film Formers
3905.91.5000	Acrylic Acid/VP Crosspolymer		Polymers & Film Formers
3905.99.8000	PVP; Polymer Blend (3 components)	European Union (EU)	Polymers & Film Formers
3906.10.0000	Polymethyl Methacrylate	European Union (EU); Japan	Polymers & Film Formers
3906.90.5000	Acrylate Copolymer; Acrylates Copolymer; Acrylates/C10-30 Alkyl Acrylate Crosspolymer; Acrylates/C12-22 Alkyl Methacrylate Copolymer; Acrylates/Ceteth-20 Itaconate Copolymer; Acrylates/Octylacrylamide Copolymer; Acrylic Polymer (In carrier blend); Acrylic Polymer / Laureth- 8 (Blend, in carrier); Acrylic Polymer / Octylacrylamide Copolymer Blend; Acrylic Polymer / Sodium Polyacrylate Blend; Acrylic Polymer Blend; Carbomer; Hydroxyethyl Acrylate/Sodium Acryloyldimethyl Taurate Copolymer; Methyl Methacrylate Crosspolymer; Polyacrylate Crosspolymer-6; Polyacrylate Crosspolymer-7; Polyquaternium-11; Polyquaternium-7; Sodium Polyacrylate; Sodium Polyacrylate Crosspolymer-1; VA/Butyl Maleate/Isobornyl Acrylate Copolymer	China; European Union (EU); Japan; South Korea; United Kingdom	Polymers & Film Formers
3907.29.0000	PEG/PPG/Polybutylene Glycol-8/5/3 Glycerin; PPG-26 Oleate; PPG-40 Butyl Ether; Polyester; Polyester / PEG-7M Blend	Japan	Polymers & Film Formers

HTS Codes (Not Exhaustive)	Cosmetic Inputs (Not Exhaustive)	Countries (Not Exhaustive)	Category
3907.61.0000	PET Resin (High Viscosity)	China; Japan; Philippines; Taiwan; Vietnam	Polymers & Film Formers
3907.69.0000	PET Resin (Low Viscosity)	China; Japan; Philippines; Taiwan; Vietnam	Polymers & Film Formers
3907.69.0050	Polyester / Acrylates Copolymer Blend		Polymers & Film Formers
3907.91.5000	Polyester		Polymers & Film Formers
3907.99.5050	Behenyl/Octylododecyl/Propanediol Citrate Crosspolymer; Bis-Octylododecyl Dimer Dilinoleate/Propanediol Copolymer; Octylododecyl Citrate Crosspolymer; Polyester; Sorbitol/Sebacic Acid Copolymer Behenate	Canada; European Union (EU); Indonesia	Polymers & Film Formers
3908.10.0000	Nylon-12; Polymer; Polymer / Nylon-6 (Blend, in carrier); Polymer / Nylon-66 (Blend, in carrier); Polymer Blend (3 components)	European Union (EU); Japan	Polymers & Film Formers
3909.39.0000	Polymer Blend (3 components)		Polymers & Film Formers
3909.50.5000	Polymer Blend (3 components); Polyurethane-1	European Union (EU)	Polymers & Film Formers
3910.00.0000	Adipic Acid/Neopentyl Glycol Crosspolymer; CXG-1104 (Silicone); Caprylyl Methicone; Cyclomethicone; Dimethicone; Dimethicone (Silicone) Blend (4 actives, in carrier); Dimethicone PEG-7 Isostearate; Dimethicone PEG-8 Beeswax; Dimethicone PEG-8 Meadowfoamate; Dimethicone PEG-8 Polyacrylate; Methicone; Silicones; Silicones in Primary Forms (Silicone); TOSPEARL 120A (Silicone); X-52-8377 (Silicone)	Brazil; Canada; European Union (EU); Japan; Thailand	Polymers & Film Formers
3911.90.9110	Polymer (In carrier blend)		Polymers & Film Formers
3912.31.0010	Cellulose Gum	European Union (EU)	Polymers & Film Formers
3912.39.0000	Hydroxyethylcellulose; Hydroxypropyl Methylcellulose; Hydroxypropyl Methylcellulose Stearoxy Ether; METHOCEL J5MS (Cellulose)	European Union (EU); Japan	Polymers & Film Formers

HTS Codes (Not Exhaustive)	Cosmetic Inputs (Not Exhaustive)	Countries (Not Exhaustive)	Category
3912.90.0010	Cellulose	Canada; Japan	Polymers & Film Formers
3913.10.0000	Algin		Polymers & Film Formers
3913.90.2015	Xanthan Gum	European Union (EU)	Polymers & Film Formers
3913.90.2090	Alcaligenes Polysaccharides; Alcalsealan (Natural Polymer) / Alcalinenes Polysaccharides Blend; Biosaccharide Gum-4; Canarium Luzonicum Gum Nonvolatiles; Glucomannan; Guar Gum; Guar Hydroxypropyltrimonium Chloride; Hydrolyzed Hyaluronic Acid; Hydroxypropyl Guar Hydroxypropyltrimonium Chloride; Mannan; PROPOL RS-C (Natural Polymer); Polysaccharides and their derivatives, other: (Natural Polymer); Sclerotium Gum; Sodium Hyaluronate	China; European Union (EU); India; Japan; Philippines; Taiwan	Polymers & Film Formers
3913.90.5000	Bis-Octyldodecyl Dimer Dilinoleate/Propanediol Copolymer; Crodasone W PE-LQ-WD (Natural Polymer, Aqueous)		Polymers & Film Formers
3914.00.6000	Polymer		Polymers & Film Formers
7103.99.5000	Cosmetic Colorant; Nephrite Powder; Tourmaline	Brazil; South Korea	Gemstones & Precious Materials
7104.90.1000	Ruby Powder; Sapphire Powder	Brazil; India	Gemstones & Precious Materials
7105.10.0015	Diamond Powder		Gemstones & Precious Materials
7105.90.0000	Cosmetic Colorant / Tourmaline Bixa Blend; Nephrite Powder; Ruby Powder; Sapphire Powder		Gemstones & Precious Materials
7108.11.0000	CI 77480; Gold Yeast Extract / Faex / Extrait De Levure	Switzerland	Gemstones & Precious Materials
7117.19.9000	Costume Jewelry Component	European Union (EU)	Gemstones & Precious Materials

Appendix II: Packaging used by U.S. cosmetic and personal care companies that cannot be sourced at scale domestically

HTS Codes (Not Exhaustive)	Cosmetic Inputs (Not Exhaustive)	Countries (Not Exhaustive)	Category
8214.10.0000	Cosmetic Tool/Blade	China; Japan; South Korea	Dispensing & Application
8308.90.6000	Metal Clasp/Fitting		Dispensing & Application
8309.90.0000	Metal Cap/Closure		Dispensing & Application
8413.20.0000	Hand Pump (Lotion/Soap)	China; India; Mexico; South Korea	Dispensing & Application
8413.91.9000	Pump Parts	China	Dispensing & Application
8424.20.1000	Piston Pump Spray; Spray Mechanism (Simple Piston)	Canada; China; Japan; Mexico; South Korea	Dispensing & Application
8424.89.7090	Mechanical Spray/Dispenser	China; Japan; South Korea	Dispensing & Application
8424.89.9000	Aptar Pumps-Park Ave; Cosmetic Pump (Dream Pump); Cosmetic Spray Mechanism; Dispensing Mechanism; Electronic Dispenser; Pump/Dispenser; Spray Gun/Applicator; Spray Mechanism	China; European Union (EU); India; Indonesia; Japan; Mexico; South Korea; Taiwan; Vietnam	Dispensing & Application
8424.90.9080	Electronic Dispenser Component; Spray Mechanism Parts	China; Indonesia; Vietnam	Dispensing & Application
8439.30.0000	Machinery for finishing paper or paperboard	China; Japan; South Korea	Dispensing & Application
9603.29.8090	Cosmetic Brush	China; Japan; South Korea	Dispensing & Application
9603.30.2000	Brushes & Sponges	China	Dispensing & Application
9603.30.6000	Cosmetic Application Brush	China; Japan; South Korea	Dispensing & Application

HTS Codes (Not Exhaustive)	Cosmetic Inputs (Not Exhaustive)	Countries (Not Exhaustive)	Category
9615.90.2000	Nonthermic, nonornamental devices for curling the hair	China; Japan; South Korea	Dispensing & Application
9616.10.0000	Perfume Spray/Atomizer		Dispensing & Application
9616.20.0000	Powder puffs and pads for the application of cosmetics or toilet preparations	China; Japan; South Korea	Dispensing & Application
2603.00.0010	Malachite	Brazil	Electronic & Other
8506.10.0000	Manganese Dioxide	China; European Union (EU); India; Taiwan	Electronic & Other
8523.52.0090	Smart Card/Electronic Component	China; Indonesia; Vietnam	Electronic & Other
9303.01.2400	Electronic Dispenser	China; Indonesia; Vietnam	Electronic & Other
9405.11.4020	Brass LED Vanity/Compact Light	China; Japan; South Korea	Electronic & Other
9803.00.5000	Substantial Container		Electronic & Other
9903.01.2000	Electronic Dispenser	China; Indonesia; Vietnam	Electronic & Other
9903.01.2300	Electronic Dispenser	China; Indonesia; Vietnam	Electronic & Other
9903.01.2400	Electronic Dispenser	China; Indonesia; Vietnam	Electronic & Other
7010.90.0540	Glass Bottle (Machine-Made, ≤0.15L)	European Union (EU); India; Mexico	Glass
7010.90.2040	Glass Perfume/Cosmetic Container (≤0.15L)	China; European Union (EU); India; Mexico	Glass
7010.90.5039	Glass Container (Other)	China	Glass
7010.90.5055	Glass Bottle	China; European Union (EU); India; Indonesia; Mexico	Glass
7017.10.3000	Quartz Reactor Tube	European Union (EU)	Glass

HTS Codes (Not Exhaustive)	Cosmetic Inputs (Not Exhaustive)	Countries (Not Exhaustive)	Category
7017.90.5000	Laboratory Glassware	China	Glass
7018.20.0000	Calcium Sodium Borosilicate; Glass Bead (Decorative)	China; European Union (EU); Japan; Mexico; South Korea	Glass
7601.10.0000	Unwrought Aluminum (Pure)	Canada; European Union (EU); Mexico	Metal (Aluminum)
7601.20.0000	Unwrought Aluminum Alloy	Canada; European Union (EU); Mexico	Metal (Aluminum)
7603.10.0000	Aluminum Powder	China; European Union (EU); Mexico	Metal (Aluminum)
7612.90.1030	Aluminum Container	Canada; China; European Union (EU); Mexico	Metal (Aluminum)
7612.90.1040	Aluminum Can ($\leq 355\text{mL}$)	Canada; European Union (EU); Mexico	Metal (Aluminum)
7612.90.1090	Aluminum Container	China	Metal (Aluminum)
7612.90.5000	Aluminum Container	China	Metal (Aluminum)
7612.90.9900	Aluminum Container (Other)	Canada; European Union (EU); Mexico	Metal (Aluminum)
7616.99.1400	Aluminum Slug	Canada; European Union (EU); Mexico	Metal (Aluminum)
7616.99.5190	Aluminum Article (Other)	Canada; China; European Union (EU); Mexico	Metal (Aluminum)
7210.11.0000	Tin-Plated Steel Sheet ($\geq 0.5\text{mm}$)	Canada; European Union (EU); Mexico	Metal (Steel)
7210.12.0000	Tin-Plated Steel Sheet ($< 0.5\text{mm}$)	Canada; European Union (EU); Mexico	Metal (Steel)
7310.21.0080	Cans; Steel Aerosol Can/Tank	Canada; China; European Union (EU); Mexico	Metal (Steel)
7310.29.0080	Metal Container; Steel Container ($< 50\text{L}$)	Canada; European Union (EU); Mexico	Metal (Steel)
7318.16.0060	Of stainless steel (Note: 7318.16.00 = Nuts)	European Union (EU)	Metal (Steel)

HTS Codes (Not Exhaustive)	Cosmetic Inputs (Not Exhaustive)	Countries (Not Exhaustive)	Category
7323.93.0080	Stainless Steel Accessory	South Korea	Metal (Steel)
8007.00.5000	Tin Container	Hong Kong	Metal (Steel)
4804.31.0090	Unbleached Kraft Paperboard	South Korea	Paper & Paperboard
4804.39.4041	Kraft Paperboard	China	Paper & Paperboard
4810.14.5000	Coated Paperboard Sheet	China	Paper & Paperboard
4817.10.0000	Envelopes	European Union (EU)	Paper & Paperboard
4819.10.0040	Corrugate; Corrugated Box	Canada; China; European Union (EU)	Paper & Paperboard
4819.20.0040	Folding Cartons; Paperboard Folding Carton; Rigid Boxes	Canada; China; European Union (EU); United Kingdom	Paper & Paperboard
4819.50.4040	Paperboard Packaging	Canada; China; European Union (EU)	Paper & Paperboard
4819.50.4060	Carriers; Paperboard Packaging	Canada; European Union (EU)	Paper & Paperboard
4821.10.2000	Labels; Paper Label	Canada; European Union (EU); Japan; United Kingdom	Paper & Paperboard
4821.90.2000	Self-adhesive	European Union (EU)	Paper & Paperboard
4823.90.8600	Liners; Paper Insert/Divider	China; European Union (EU); Japan; United Kingdom	Paper & Paperboard
4909.00.4000	Printed Card/Insert	Hong Kong	Paper & Paperboard
4911.10.0020	Printed Catalog/Insert	South Korea	Paper & Paperboard
4911.99.8000	Printed Paper Insert	China	Paper & Paperboard
3919.90.1000	Self-Adhesive Plastic Sheet/Film		Plastic
3919.90.5060	Plastic Label		Plastic
3920.51.5090	PMMA Sheet/Film		Plastic
3920.62.0000	Plastic Film/Sheet	South Korea	Plastic
3920.62.0090	PET Film (Metallized); Packaging Films	United Kingdom	Plastic
3920.99.2000	Plastic Film (Other); Polyvinyl Alcohol	Japan	Plastic

HTS Codes (Not Exhaustive)	Cosmetic Inputs (Not Exhaustive)	Countries (Not Exhaustive)	Category
3921.13.5000	Polyurethane Film/Sheet	China	Plastic
3921.90.4010	Paper-Reinforced Plastic Sheet	Canada; China; Mexico	Plastic
3921.90.4090	Non-Cellular Plastic Sheet/Film	Canada; China; Mexico	Plastic
3923.10.0000	Plastic Box/Case		Plastic
3923.10.9000	Plastic Box/Case		Plastic
3923.21.0000	Polyethylene Bag/Pouch	Canada; Japan; Mexico; Vietnam	Plastic
3923.29.0000	Plastic Bag/Pouch (Other); Pouch	China	Plastic
3923.30.0000	Plastic Bottle/Container	China	Plastic
3923.30.0010	Plastic Bottle/Container; Plastic Jar	China; South Korea	Plastic
3923.30.0090	Bottles & Jars; Bottles - Plastic; Capsule Bottle & Lid; Carboys, bottles, flasks and similar articles; Plastic Bottle/Container; Plastic Jar; Rigid Plastic Packaging	Canada; China; European Union (EU); Hong Kong; Japan; Mexico; South Korea; Taiwan; Vietnam	Plastic
3923.40.0090	Tubes	Canada; China; European Union (EU); Japan; Mexico; Switzerland	Plastic
3923.50.0000	Caps, Lids, Droppers; Closures; Plastic Cap/Closure; Plastic Plug/Stopper	China; European Union (EU); Hong Kong; Japan; Mexico; South Korea; Taiwan	Plastic
3923.90.0000	Plastic Packaging (Other)		Plastic
3923.90.0080	Jars - Plastic; Plastic Pail/Bucket	Canada; China; European Union (EU); Mexico; Switzerland; Taiwan	Plastic
3926.69.0985	Other Plastic Article		Plastic
3926.90.2100	Plastic Medical/Hygiene Article	China	Plastic

HTS Codes (Not Exhaustive)	Cosmetic Inputs (Not Exhaustive)	Countries (Not Exhaustive)	Category
3926.90.9989	Collar; Discs; Electronic Dispenser Housing; Other Plastic Article (Cosmetic Use); Plastic Compact Case; Plastic Disc/Pan; Plastic Lipstick Component; Plastic Mascara/Brow Component; Plastic Spatula	China; European Union (EU); India; Indonesia; Japan; Mexico; South Korea; Switzerland; Taiwan; Vietnam	Plastic
4202.11.0090	Leather Cosmetic Case	China	Plastic
4202.19.0000	Travel Case/Container	China	Plastic
4202.31.0090	Leather Case/Container	China	Plastic
4202.92.3031	Plastic/Textile Cosmetic Bag	China	Plastic
4202.92.4500	Plastic/Textile Travel Case	China	Plastic
4202.92.9000	Plastic/Textile Container	China	Plastic
4209.09.0900	Acid Blue 74	European Union (EU)	Plastic
5003.00.0000	Silk Powder	Japan	Textile & Fiber
5806.32.1030	Decorative Ribbon	China	Textile & Fiber
6305.33.0050	Bags	Canada; China	Textile & Fiber
6307.90.9891	Textile Accessory	China	Textile & Fiber



Appendix III: Regulatory Barriers Impacting U.S. Cosmetics and Personal Care Products Exports

China

Our members' success depends on expanding sales opportunities beyond the United States and exporting to overseas markets, including China, which is one of the world's largest and fastest-growing markets for U.S. cosmetic products. In 2025, U.S. cosmetic exports to China totaled \$ 711 million underscoring strong and sustained demand and the importance of maintaining reliable market access. However, China's measures, standards, and guidelines implementing its Cosmetics Supervision and Administration Regulation (CSAR) continue to raise significant concerns. PCPC has highlighted these issues in public consultations conducted by China's principal cosmetics regulator, the National Medical Products Administration (NMPA), as well as in comments submitted to the WTO Committee on Technical Barriers to Trade (TBT). These concerns, which are shared by the global cosmetics industry, have largely not been addressed in China's final measures, creating ongoing barriers for U.S. companies seeking to compete in this critical market.

China's requirements are unnecessarily burdensome, diverge significantly from those in other major cosmetics markets and are not appropriately tailored to the relatively low safety and health risks associated with cosmetics compared to sectors such as pharmaceuticals and medical devices. The following sections provide additional detail on the most problematic aspects of China's cosmetic regulation.

Arbitrary and Trade Restrictive Animal Testing Requirements

The global cosmetics industry has in recent years made critical advancements in utilizing non-animal approaches to demonstrate the safety of cosmetic and personal care products. The industry's goal of eliminating animal testing for cosmetic products and ingredients is supported by cosmetics regulators around the world, including NMPA, and that goal also reflects public values and sentiments. Thus, international regulators accept non-animal approaches to cosmetics safety assessment, and lawmakers and regulators in many countries have banned the use of animal testing for cosmetics.

PCPC and our members are therefore highly concerned that in various CSAR implementing measures, NMPA continues to require animal testing for cosmetic

products and ingredients. These burdensome and unnecessary testing requirements also may force manufacturers to conduct testing that runs counter to animal testing regulations in other jurisdictions and may undermine companies' global commitments and competitiveness.

The Cosmetics Registration and Filing Material Management Provisions issued by NMPA offer an opportunity for a filer of imported products to provide a certification of its manufacturing quality system issued by a competent government authority, in order to obtain an exemption from toxicology reports (i.e. testing on animals) for "ordinary cosmetics." Because U.S. FDA does not issue such certifications, American companies are having great difficulty fulfilling this requirement. While certain U.S. state authorities have agreed to issue relevant certificates, this remains a difficult obstacle for manufacturers in other states. In addition, we are concerned that Chinese provinces have adopted differing approaches to this requirement, resulting in unpredictable and inconsistent application of the specific requirements for these certificates throughout China.

Moreover, a certificate of quality management issued by a "competent government department" is not an appropriate criterion for a waiver from toxicology reports. Quality management systems do not relate directly to ingredient safety that animal tests are typically used to support, such that a certification of a company's quality system would serve as a proxy. Non-animal safety methods are the most adequate substitute for toxicology tests on animals, and global companies have substantial experience in utilizing these alternative approaches to determine the safety of cosmetic products and their ingredients.

As a result of these arbitrary and trade restrictive requirements, U.S. companies may be forced to conduct unnecessary animal testing. Moreover, the inability to obtain required documentation for an exemption from animal testing will effectively make exporting to China impossible for many PCPC member companies that have taken commitments against subjecting products to animal testing in China.

In other contexts relevant to cosmetics, China does not require certification to Good Manufacturing Practices (GMPs) from a competent government authority but rather allows applicants to supply proof of compliance from an industry association or an international organization, including the International Standards Organization (ISO). Indeed, China's current certification requirement for toxicology testing on animals

fails to recognize that other countries utilize distinct means of monitoring manufacturer compliance.

Recommendation: The U.S. Government should press NMPA to amend its rule to show maximum flexibility in accepting statements of compliance from a variety of regulatory authorities, industry organizations, international organizations, or third parties or eliminate the requirement for U.S. products.

Barriers to Ingredient Approval

Obtaining approval for cosmetic ingredients in China remains challenging, time-consuming, and resource-intensive, creating significant barriers for U.S. companies seeking to bring safe and innovative products to market. Despite NMPA's stated commitment to facilitate the approval of ingredients that have been scientifically evaluated by international authoritative bodies and have a demonstrated history of safe use abroad, in practice, applicants often face duplicative data requirements and additional testing obligations that delay market access.

For ingredients that have already been assessed and approved in other jurisdictions, these redundant requirements are unnecessary and place an undue burden on companies without providing meaningful additional safety benefits. Aligning more closely with international standards would help streamline approvals while maintaining high safety standards.

Recommendation: For ingredients that have been scientifically evaluated by recognized international authorities and have a history of safe use, NMPA should rely on existing approvals, standards, or guidance from foreign jurisdictions. Where applicants can demonstrate such prior approval, NMPA should grant record-filing or registration without requiring additional testing.

Align with International Standards

China's cosmetic quality requirements are not aligned with widely accepted international standards, creating unnecessary compliance challenges for U.S. companies. In particular, the lack of clear recognition of International Organization for Standardization (ISO) standards limits the ability of overseas manufacturers to rely on established global frameworks to demonstrate compliance. This results in duplicative requirements, added costs, and uncertainty. In addition, requirements

related to product sample retention and overseas inspections lack clarity and flexibility, further complicating compliance for U.S. exporters.

These misaligned requirements increase regulatory burden, delay market access, and reduce operational efficiency for U.S. companies. The inability to rely on ISO standards forces companies to navigate redundant processes, while unclear expectations around sample retention and inspections create additional logistical and compliance challenges.

Recommendation: The U.S. government should urge NMPA to harmonize its cosmetic quality requirements with international standards, including explicitly recognizing ISO standards as an acceptable means of demonstrating compliance. NMPA should also clarify that samples for imported products may be retained overseas and made available upon request, and ensure that any rules governing overseas inspections clearly permit reliance on ISO standards.

Burden of Article 42 on Product Changes and Ingredient Variability

Article 42 of the *Provisions for Management of Cosmetic Registration and Notification Dossiers* under CSAR imposes significant administrative burdens and regulatory uncertainty for U.S. companies. It requires updates and, in many cases, extensive re-submissions when ingredient manufacturers or quality specifications change, even when such changes do not affect product safety or formulation. In practice, routine and often minor composition changes from raw material suppliers can trigger these requirements. The provision is particularly restrictive in requiring that the content of main functional components remain unchanged, a standard that is difficult to meet given normal variability in raw materials. As a result, low-risk changes can lead to unnecessary delays, increased costs, and disruptions in maintaining exported products on the Chinese market.

Recommendation: The U.S. government should encourage NMPA to adopt a risk-based approach under Article 42 by clearly distinguishing between minor and substantive changes. For changes that do not impact product safety or function, NMPA should limit documentation requirements and clarify that routine variations in raw materials do not trigger re-submission obligations.

Overly Restrictive Claims Regulations and Disclosure of Claims Validation Methods

China's approach to regulating cosmetic claims under the CSAR and the Cosmetic Functional Claims Evaluation Specifications is overly burdensome. NMPA unreasonably restricts the types and content of claims, adopts a highly prescriptive framework for claims validation, and requires certain testing to be conducted in China.

NMPA limits the wording and content of claims, including prohibiting statements such as allergy-tested or doctor-reviewed. This approach is more restrictive than in other major markets and limits both company communications and consumer choice. The Claims Specifications take a rigid approach to validation, reducing flexibility for registrants and filers to use appropriate methods. In addition, NMPA mandates specific validation methods, sometimes requiring Chinese methods over internationally accepted ones, and requires in-country testing for certain claims categories even when data already exists. Cross-referencing of efficacy data is also not permitted.

These requirements are inconsistent with the low-risk nature of cosmetics and impose significant commercial burdens. They are not necessary or proportional to the risks they are intended to address.

Recommendation: The U.S. government should urge NMPA to adopt a more flexible, risk-based approach to cosmetic claims by allowing a broader range of claim language consistent with international practice, permitting the use of internationally accepted validation methods, accepting data generated outside of China, and allowing cross-referencing of existing efficacy data.

European Union

The United States and the European Union (EU) are the two largest cosmetics markets in the world and serve as each other's top trading partners. In 2025, bilateral trade in cosmetics and personal care products totaled \$13.0 billion, with U.S. exports to the EU exceeding \$2.7 billion.

This mutually beneficial relationship supports innovation, job creation, and manufacturing growth on both sides of the Atlantic. However, a growing number of

non-tariff barriers imposed by the EU threaten continued U.S. market access and long-term industry competitiveness.

In addition, because other jurisdictions frequently adopt the EU's regulatory model, these barriers extend beyond the EU market and are replicated globally. This creates additional obstacles for U.S. companies in third-country markets, including Asia, the Middle East, and Latin America, compounding their impact on U.S. competitiveness.

Revise Article 15 of the EU Cosmetic Products Regulation

Article 15 of the EU CPR imposes automatic bans on ingredients classified as carcinogenic, mutagenic, or toxic to reproduction (CMR 1A,1B) under the EU's CLP Regulation—regardless of the actual exposure level, route of application, or likelihood of harm in real-world cosmetic use. This hazard-based approach disregards critical scientific factors such as dosage, concentration, and method of application. Ingredients that may pose risks when ingested can, in fact, be entirely safe when applied topically in controlled formulations.

In contrast, modern regulatory frameworks—such as those used by the U.S. FDA and the Organization for Economic Co-operation and Development (OECD)—employ risk-based assessments that evaluate both hazard and exposure. The EU's hazard-only model under Article 15 diverges from these international best practices and undermines efforts toward global regulatory alignment.

While Article 15 technically allows for exemptions, the criteria are so narrowly defined that so far, exemptions have never been granted—even for substances with a long-standing record of safe use and confirmation of safe use in cosmetics by the EU Commission's Scientific Committee for Consumer Safety (SCCS). This rigidity leads to the unnecessary prohibition of safe and effective ingredients in U.S. cosmetic and personal care products to be placed on the EU market.

The consequences are significant. U.S. exporters encounter unreasonable barriers to market entry, as many products considered safe under U.S. law are effectively barred from the EU market. This not only limits transatlantic trade but also U.S. exports to other markets that follow EU decisions.

Recommendation: Reform Article 15 of the CPR to allow workable risk-based exemptions of CMR 1A, 1B substances, using transparent scientific criteria and

stakeholder consultation. This will align the EU with global best practices while upholding safety. Remove unjustified criteria that go beyond safe use in cosmetics, such as compliance with EU food law and non-availability of suitable alternatives.

Stop the Classification of Substances Under CLP

Thousands of cosmetic products that can be safely sold and used in the United States could lose market access in the EU, unless the EU stops the review of the substances under the EU Classification, Labelling and Packaging (CLP) Regulation (EC) No 1272/2008³. The CLP adopts a hazard-based classification approach, leading to substances are regulated based solely on intrinsic properties and not on the actual risk that they pose to consumers.

Under the EU Cosmetic Products Regulation (CPR) Article 15⁴, any substance classified CMR 1A, 1B (carcinogenic, mutagenic, or toxic for reproduction) under CLP is automatically banned from cosmetics—regardless of actual consumer risk or exposure levels.

As a result, U.S. cosmetics manufacturers face the loss of key ingredients widely used and considered safe in cosmetic products, including:

- Heliotropine
- Tea Tree Oil
- Compounds: Cyclamal, Cyclemax, Cumin Aldehyde, P-Cymene
- Fragrance ingredients: Acetophenone, Tonalide, Galaxolide

Recommendation: Stop the classification decisions of the above substances under CLP until the EU adjusts Article 15 of the CPR and allows risk-based decisions on the use of these substances in cosmetics.

The EU should not apply theoretical thresholds to multi-component natural ingredients (e.g. essential oils) when actual test data show no harm. Recently the EU published a temporary derogation for natural complex substance (e.g. plant extracts and essential oils) which should be made permanent to provide more legal certainty for U.S. exporters.

³ [Regulation on classification, labelling and packaging of substances and mixtures, amending and repealing Directives 67/548/EEC and 1999/45/EC, and amending Regulation \(EC\) No 1907/2006](#)

⁴ [Regulation \(EC\) No 1223/2009 of the European Parliament and of the Council of 30 November 2009 on cosmetic products](#)

Remove Oral Exposure Assumptions for Topical Products.

CLP classifications based on oral toxicity are being applied to topically applied products. This disconnect requires correction via risk-based reviews.

Eliminate Duplicative Nanomaterial Prenotification Requirements

The six-month nanomaterial prenotification is unnecessary and duplicative. All cosmetic products, including those containing nanomaterials, are already subject to notification through the Cosmetic Product Notification Portal (CPNP) prior to market entry. Requiring a separate, advance submission solely for nanomaterials adds no additional value to consumer safety or regulatory oversight.

No equivalent requirement exists in the U.S. or other major markets. The six-month waiting period significantly delays product development and market entry—particularly for international manufacturers such as those in the United States. Moreover, the EU Commission rarely provides legal certainty to support the use of the ingredient after the six-month window. These delays impact time-sensitive innovation cycles and can result in missed seasonal or trend-driven market windows. For many small and mid-sized U.S. exporters, this extended timeline poses a real barrier to EU market access and discourages new product launches.

Recommendation: Eliminate the standalone six-month nanomaterial prenotification under Article 16(3) of the CPR. Use the CPNP system under Article 13 of the CPR to notify nano-ingredients as part of standard notifications.

Do Not Extend “General Risk Approach” Evaluations Under Registration, Evaluation, Authorization and Restriction of Chemicals (REACH)⁵

The EU’s Chemical Strategy for Sustainability (CSS), a vehicle for REACH reform, adopted in 2020, introduced the concept of “generic risk approach” (GRA) during the evaluation of substances. The GRA concept targets specific sectors, including cosmetics. The CSS calls for hazard-based classifications such as: CMR, endocrine disrupting, or persistent in the environment. This is in contrast to a full risk-based review would consider the specific uses of or exposure to the substances.

Indiscriminate application of GRA would lead to unwarranted reformulations and extra costs for industry without attendant benefits to consumers or the environment.

⁵ <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A02006R1907-20221217>

Such an application of GRA could result in a ban on ingredients that have been commonly and safely used for thousands of years. Some examples are hair dyes and UV filters which may be under threat of EU bans. This would result in fragmented supply chains and disproportionately affect U.S. SMEs that may not be able to maintain separate supply chains for the EU market.

Recommendation: Do not extend the “General Risk Approach” of hazard-based bans under REACH beyond CMR 1A, 1B substances.

Extend Transition Times for Ingredient Bans and Relabeling

Reformulating cosmetics and personal care products to ensure compliance, safety, and consumer acceptance is an intricate process that typically spans several years. This timeline encompasses ingredient research, compatibility testing, safety assessments, regulatory reviews, manufacturing modifications, marketing approvals, and consumer validation. In particular, for relabeling minor formulation changes that do not impact safety, the EU’s current three-year shelf removal policy is unreasonable and places undue strain on U.S. exporters.

Recommendation: The EU should commit to allowing adequate transition times for the implementation of ingredient bans or relabeling. Like in the United States, an indefinite sell through should be allowed for relabeling changes that do not impact safety.

Urban Wastewater Treatment Directive (UWWTD)

The UWWTD⁶ will place extraordinary financial obligations on the cosmetic sector based on an impact assessment which overestimated the contribution by personal care products to pollution in urban wastewater systems. Therefore U.S. companies exporting to the EU will be required to provide an overestimated payment into in Extended Producer Responsibility schemes.

Recommendation:

We urge the U.S. government to push the EU to stop-the-clock on Member State implementation of the UWWTD until the following points below are addressed, to reassess the Extended Producer Responsibility scheme based on accurate data and a fair application of the “Polluter Pays Principle,” to change the approach to determining

⁶ <https://eur-lex.europa.eu/eli/dir/2024/3019/oj/eng>

pollution in wastewater so that it is based on the substances found in water systems rather than placing responsibility on individual sectors, and to develop a positive list of micropollutants approved on the EU level while implementing a harmonized program to develop urban wastewater systems across the Member States.

Packaging and Packaging Waste Regulation (PPWR)

There are significant concerns regarding the lack of legal certainty in the implementation of the EU Packaging and Packaging Waste Regulation (PPWR), particularly given the absence of key secondary legislation and the resulting unworkable compliance timelines. With the general application date of August 12, 2026 approaching, U.S. exports will start complying with certain elements such as a Declaration of Conformity and packaging minimization. Other critical elements have deadlines that are fast approaching and include, recycled content obligations and calculation methodologies, and equivalence standards for non-EU materials. Despite recent Commission guidance and FAQs, there are many areas which have not been clarified. This uncertainty is especially problematic because the PPWR establishes sustainability requirements as de facto market access conditions, meaning that non-compliant packaging cannot be placed on the EU market. As a result, companies face substantial compliance and enforcement risks, including potential enforcement actions where obligations are not sufficiently clear or foreseeable. The lack of clarity also undermines investment planning, product development, and supply chain adjustments, particularly in sectors such as cosmetics, where packaging is integral to product function and requires long innovation cycles.

Several substantive provisions further increase uncertainty and create potential trade barriers, for example:

- Requirements related to recycled content, including EU-specific methodologies for mass balance accounting and equivalence standards for recycled plastics sourced outside the EU, risk diverging from internationally recognized systems and may effectively exclude U.S. materials or impose extraterritorial conditions.
- Packaging minimization rules and standardized thresholds may not reflect the technical and functional realities of cosmetic product packaging, potentially forcing costly redesigns or limiting market access. In the cosmetics sector, packaging is not merely a container but an integral part of the product itself. It performs essential functions such as protection, dosing, dispensing, and application (e.g., mascara brushes, pumps, and lipstick mechanisms).

- The EU intends to define its own methodology for mass balance accounting for chemically recycled plastics. Existing systems used in the United States rely on established standards and certification schemes, which may not be recognized under the EU approach.
- Recyclability requirements, which will become binding market access conditions by 2030, are particularly concerning, given the absence of finalized criteria or methodologies, making it difficult for companies to design compliant packaging within realistic timeframes.

Finally, the PPWR leaves considerable discretion to Member States in several areas, potentially resulting in divergent national implementation, further fragmenting the EU Single Market, increasing compliance burdens, and disproportionately affecting non-EU exporters.

Recommendation: The United States Government should engage with the European Commission to ensure that the implementation of the PPWR provides legal certainty, workable timelines, and non-discriminatory market access conditions. In particular, the United States should urge the EU to adopt clear and timely secondary legislation, recognize equivalent international standards and certification schemes for recycled materials, and avoid EU-specific methodologies that create unnecessary obstacles to trade. The United States should also encourage the EU to provide sufficient transition periods and ensure that implementation does not result in divergent national requirements that fragment the Single Market.

India

India is a significant and underdeveloped market for U.S. cosmetic exports, but growth remains constrained by burdensome regulatory requirements that disproportionately affect imported products. U.S. companies report inconsistent treatment, with domestic products facing limited scrutiny while imported products encounter substantial barriers to market entry. The United States currently runs a \$251 million cosmetic trade deficit with India, underscoring the impact of these challenges. U.S. exports would increase if these market access barriers are addressed in U.S.-India negotiations.

We appreciate the work the U.S. government has already undertaken on behalf of the cosmetics industry in its engagement with India, including securing the removal of previously high tariffs on U.S. cosmetic exports. It is important that these tariff reductions are maintained. Building on this progress, continued engagement should focus on aligning India's safety and regulatory framework with international standards, including ISO, and ensuring that product-specific standards remain voluntary.

BIS Requirements for Finished Cosmetics: A Growing Market Access Barrier

India's regulatory approach to cosmetics creates significant trade barriers for U.S. exporters due to the mandatory BIS product standards and the possible introduction of a QCO for finished cosmetics.

Cosmetics in India are regulated under the Drugs and Cosmetics Act, 1940 and the Cosmetics Rules, 2020, with ingredient restrictions set out in BIS IS 4707 (Part 1 and Part 2), including 37 mandatory vertical standards for finished products. These vertical standards impose prescriptive requirements that extend beyond safety and diverge from international regulatory approaches.

Unlike the United States and the EU, which focus on ingredient safety, toxicological evaluation, and post-market surveillance, India's product-specific standards prescribe detailed quality and performance characteristics that often do not enhance consumer safety but do increase costs, delay timelines, and constrain product innovation.

Several BIS product specific standards illustrate these concerns:

- IS 6608:2004 (Skin Creams – Specification), reconfirmed in 2019, constrains formulation flexibility and limits innovation in modern textures. Skin serums and face drops are required to comply with IS 6608 despite the absence of a category-specific standard for these products. This forces innovative lightweight and hybrid formats into legacy specifications that were not designed for them.
- IS 33529 (Draft 2026 – Skin Lotions) includes testing parameters such as Spin Test and Rub Test, which are not relevant to lotion products. At the same time, relevant modern performance parameters are not clearly incorporated.
- IS 10284:1982 (Lipsalve), IS 6608:2019 (Skin Creams), IS 1049:1962 (Perfumery Grade Alcohol), and IS 14648:2011 (Microbiological Examination of Cosmetics Raw Materials – Methods of Test) are additional standards creating operational challenges due to outdated or rigid specifications.

- In color cosmetics, standards governing lipstick include testing that does not reflect modern long-wear or transfer-resistant formulations. For shampoos, prescriptive foam height requirements do not accommodate sulfate-free or low-lather formulations that are now globally accepted and preferred. In creams, shampoos, and soaps, Total Fatty Matter (TFM) requirements restrict gel-cream and synthetic detergent formats that are widely marketed in the U.S. and EU.

The cumulative effect is that innovation-driven categories such as lipsticks, skin creams, shampoos, and eye makeup are required to conform to legacy specifications that emphasize “product quality” metrics rather than safety.

Sunscreens present a particularly burdensome example. India requires compliance with IS 17492:2021 (ISO 24442:2011 – SPF determination), IS 17493:2021 (ISO 24443:2021 – In vitro UVA protection), IS 17494:2021 (ISO 24444:2019 – In vivo SPF determination), and IS 17660:2021 (ISO 16217:2020 – Water resistance). While these standards reference ISO methodologies, implementation presents practical and financial obstacles. There is limited availability of NABL-accredited laboratories capable of conducting in vivo and in vitro testing, resulting in long wait times for test slots. Companies must recruit suitable test subjects and secure Institutional Ethics Committee approvals. These requirements, combined with high testing costs, significantly burden companies with multiple SKUs.

Even where a product has been tested in compliance with internationally recognized U.S. or EU standards, India requires local testing through Central Licensing Authority–approved or NABL-accredited laboratories. Some in-house labs may qualify if specifically approved, but this is not the norm. As a result, companies must ship finished product samples to India for testing, incurring freight costs of approximately \$300–400 per shipment. Local lab testing costs approximately \$250 per product. Across hundreds of SKUs annually, this results in a substantial financial and operational burden.

In at least one case, authorities refused import of a sunscreen because its SPF test did not precisely match the BIS-recognized method at the time, even though it met internationally recognized safety and performance requirements. This resulted in cancellation of a planned product launch.

The incremental compliance cost per SKU associated with BIS vertical standards is estimated at approximately \$780 to \$ 3,000, based on data provided by one member company and not representative of the entire industry. These costs include reformulation, retesting, quality assurance documentation, labeling and packaging changes, stability studies, and delayed time to market. Minor modifications may add 2–6 weeks to timelines. Major reformulations may add 2–3 months. Full compliance following standard revisions can extend 12–24 months. As a practical matter, India typically launches products 6–8 months after global launches due to the sequencing of manufacturing, finished-goods testing, and registration approvals. Beyond cost and delay, vertical standards also constrain innovation. Requirements embedded in IS 6608 and related standards can restrict lightweight emulsions, silicone-based systems, polymer-stabilized formats, gel hybrids, and advanced dermo-cosmetic delivery approaches that are common in international markets.

Recommendation: India’s product-specific BIS standards impose requirements that exceed internationally accepted norms, restricting innovation and delaying the introduction of new cosmetic products. These prescriptive, “vertical” standards often fail to keep pace with scientific and technological advances, making it commercially difficult for companies to respond to evolving consumer demand in India’s fast-moving marketplace.

The United States should press India to align its regulatory framework with international best practices by prioritizing ingredient-based restrictions, science-based safety assessments, internationally recognized ISO standards, and robust post-market surveillance. India should make BIS product-specific standards without ISO equivalents voluntary, and where ISO-equivalent standards exist, align BIS requirements directly with those ISO standards. Adoption of these reforms would maintain consumer safety while reducing duplicative testing requirements, supporting innovation, and expanding market access for U.S. companies.

Quality Control Order for Finished Cosmetics

The proposed Quality Control Order (QCO) for finished cosmetics could significantly escalate the regulatory burden for U.S. exporters by adding a second layer of mandatory certification that could include manufacturing site inspections, product marking requirements, certification fees, ongoing surveillance obligations, and potential recertification upon formulation or packaging changes. Introduced for discussion on March 13, 2025, the QCO would impose a mandatory BIS certification

requirement in addition to the existing regulatory framework under the Drugs and Cosmetics Act, 1940, the Cosmetics Rules, 2020, and applicable BIS standards. This would create duplicative oversight without a corresponding improvement in consumer safety outcomes.

The operational and financial consequences could be substantial. For at least one company, a preliminary internal estimate indicates that compliance with a finished cosmetics QCO could exceed \$1 million per cosmetic product, depending on whether the requirement is applied at the individual SKU level or at a broader product category level. The scope of application remains unclear, creating additional commercial uncertainty for exporters planning product launches.

Beyond direct costs, a QCO would introduce material risks to supply chains and product availability. Certification capacity constraints could lead to inspection backlogs, delayed approvals, and bottlenecks similar to those observed in other sectors subject to QCOs. Even temporary administrative delays could result in missed launch windows, inventory disruptions, and reduced competitiveness for U.S. brands in the Indian market.

Experience across sectors demonstrates that implementation of Quality Control Orders (QCOs) can disrupt market access and increase compliance complexity, particularly where duplicative testing and certification requirements are layered onto existing regulatory regimes. While some chemical-sector QCOs have been withdrawn or deferred, others remain in force, and a QCO for finished cosmetics continues to reemerge in policy discussions. Even in the absence of a formal implementation timeline, this regulatory uncertainty complicates investment and export planning for U.S. companies.

Recommendation: The U.S. Government should urge India to avoid adopting a mandatory QCO for finished cosmetics, which would impose significant costs, extend approval timelines, and create unnecessary regulatory duplication without enhancing product safety.

Indonesia

We appreciate the significant efforts undertaken by USTR in its negotiations with Indonesia and welcome the outcomes reflected in the [U.S.-Indonesia ART](#)

[agreement](#)⁷. The commitments secured represent meaningful progress in addressing longstanding barriers facing U.S. cosmetics and personal care products. In 2025, bilateral cosmetics trade totaled \$225 million, with U.S. exports to Indonesia reaching \$94 million, underscoring the commercial significance of this market and the tangible benefits of further regulatory cooperation

We commend provisions that ensure duty-free treatment for U.S.-origin cosmetic products; reduce non-tariff barriers such as duplicative testing, conformity assessment, and heavy metal testing requirements; and exempt U.S. cosmetics from halal certification and labeling requirements. We also strongly support Indonesia's commitments to Good Regulatory Practices, including increased transparency, public consultation, alignment with international standards, and recognition of U.S. compliance procedures.

These outcomes have the potential to significantly improve market access, reduce compliance costs, and enhance regulatory predictability for U.S. companies operating in Indonesia. If fully implemented, they will facilitate the ability of U.S. exports to enter and compete in the Indonesian market more efficiently.

Recommendation: We encourage the U.S. Government to continue its engagement with Indonesia to ensure that these commitments are fully and effectively implemented. Ongoing monitoring and enforcement will be critical to ensuring that the agreement delivers its intended benefits and supports U.S. exports and commercial operations in Indonesia.

Japan

Both the United States and Japan maintain robust, science-based regulatory systems for cosmetics and have demonstrated sustained leadership through more than a decade of engagement in the International Cooperation on Cosmetic Regulations (ICCR). This longstanding collaboration provides a strong foundation for deeper regulatory alignment. However, remaining divergences continue to impose unnecessary costs, delays, and barriers for U.S. exporters seeking access to the Japanese market. Addressing these gaps presents a clear opportunity to expand trade and enhance the competitiveness of U.S. cosmetic products abroad. In 2025, bilateral cosmetics trade totaled \$577 million, with U.S. exports to Japan reaching \$332 million,

⁷ [02.19.26 US-IDN ART Full Agreement - US Final for Website sanitized.pdf](#)

underscoring the commercial significance of this market and the tangible benefits of further regulatory cooperation.

Reduce the Registration Time for Quasi-Drugs

The United States and Japan recognize a category of cosmetics products classified as quasi-drugs (QD) in Japan and OTC cosmetic products in the U.S. Industry finds that Japan's regulatory requirements for cosmetic quasi-drug products are overly burdensome and time consuming and often hinder the timely market launch of innovative products that Japanese consumers want.

Recommendation: The U.S. government should seek commitments from Japan that would reduce the registration lead time required for authorization of cosmetic quasi-drug products. Japan should implement an expedited process for approving products using ingredients and raw materials already approved for use by consumers.

Eliminate Unreasonable Requirements for Non-active (excipient) Ingredients

The Japanese requirement to register non-active (excipient) ingredients used in quasi-drug products contributes to a burdensome and lengthy approval process, and disadvantages both manufacturers and Japanese consumers. In the United States and most other countries around the world, excipient ingredients that are commonly used in cosmetic or other consumer products do not require pre-approval. Instead, manufacturers are given responsibility to assure the safety and use of these ingredients.

Recommendation: U.S. negotiators should seek a commitment from Japan to eliminate requirements for registration of non-active ingredients as part of cosmetic quasi-drug registrations.

Eliminate Unreasonable Restrictions on Product Claims

Cosmetics is a very fast-moving, "fashion oriented" industry, with new and innovative products continually introduced to the market. Claims are an important way for companies to communicate the characteristics and benefits of their products so that consumers can differentiate and make informed choices. Companies undertake a variety of scientific means to validate cosmetic claims, and as long as the claims are valid, and truthful, they should be allowed. The United States, Europe and other countries around the world recognize that unnecessary limitations on cosmetic product claims hinders innovation and sector growth and therefore have established

overall guidance that does not ban particular words or phrases that, in context, are truthful and that allow consumers to make informed choices.

In contrast, under the current cosmetic regulatory system, Japan allows companies to use only 56 specifically worded claims in describing their products. Many product claims that are routinely made in the United States and other regions are not allowed in Japan, even though they are substantiated with significant and verifiable data and are consistent with both international standards and with Japan's Premiums and Representations Law, which governs advertising of other consumer products.

Japan's system of a “positive list” for claims puts both consumers and manufacturers at a disadvantage, limiting innovation and the use of marketing tools that provide valuable information to the consumer.

Recommendations: U.S. Government should seek a commitment from Japan to allow any claims for cosmetic or cosmetic quasi-drug products, including effects that can be demonstrated numerically, that are in keeping with the definition of the product category and that are based on significant and verifiable data.

Improve the Import Process for Cosmetics & Cosmetic Quasi-Drugs

Japan does not allow foreign companies to apply directly for a license to market cosmetic products in Japan. Rather, U.S. companies that wish to export to Japan must find a licensed importer or set up a subsidiary. After this has been completed, the company then needs to file a notification of the product that is to be manufactured or sold.

Recommendations: U.S. Government should seek commitments from Japan that would allow U.S. companies to obtain marketing licenses directly from the Japanese government. Elimination of this import barrier would facilitate U.S. exports and reduce costs, thereby opening additional opportunities for the entire U.S. industry, including small and medium-sized companies.

Korea

Korea is a critical export market and trading partner for U.S. cosmetics and personal care companies, supporting significant commercial activity and long-term industry growth. As such, it is essential that Korea's regulatory framework remains transparent,

science-based, and aligned with international best practices to avoid creating unnecessary barriers to trade. Recent developments related to Korea's draft cosmetic safety assessment regulation raise concerns about potential divergence from these principles and the implications for U.S. companies operating in this market.

Draft Safety Assessment Regulation

PCPC understands that Korea's Ministry of Food and Drug Safety (MFDS) is developing a cosmetic safety assessment regulation in coordination with the local cosmetic association and a selected group of companies, including some international companies.

Recommendation: The U.S. government should press Korea to ensure this regulation aligns with international best practices and does not create unnecessary barriers to trade. A global harmonized regulation should be prepared, MFDS is urged to follow the U.S. approach to safety assessment. Otherwise, if Korea adopts a more prescriptive framework, it should align with the EU model. The U.S. government should make clear that Korea must not adopt elements of the China model, which is highly burdensome and trade restrictive. Before legalization, pre-alignment with PCPC is critical to help prevent potential trade barriers.

For smooth trade in exports and imports, assessment reports should be mutually recognized between the U.S. and Korea, and among trading partners across the globe. Qualifications of product safety assessors should be aligned with, or at least equivalent to, international qualifications. Product Safety Assessor should not be limited to Korean nationals, if foreign candidates meet the required qualifications.

PCPC has not seen a draft of the regulation. The U.S. government should call on Korea to immediately release a draft and ensure a transparent consultation process with meaningful stakeholder input prior to finalization.

Failure to ensure transparency and alignment with international approaches should be raised as a significant trade concern.

Mexico

The mutually beneficial North America trade relationship between the United States, Canada and Mexico, made possible by USMCA and its Cosmetic Annex, fosters innovation, job creation, and manufacturing growth across North America. In 2025, the U.S. exported \$1.4 billion to Mexico. While the agreement has delivered

meaningful progress, certain commitments have not yet been fully implemented or consistently observed by trading partners. We offer the following recommendations to strengthen the trade relationship with Mexico to benefit U.S. cosmetics and personal care product exports.

Mexico Customs Practices and Certificate of Origin Verification

Streamlined customs procedures in Mexico continues to present challenges for U.S. companies. Mexico's tax authority, the Servicio de Administración Tributaria (SAT), has increased scrutiny of certificates of origin (COOs) used to qualify products for preferential tariff treatment under both NAFTA and USMCA. U.S. companies report a rise in audits and expanded documentary requirements to demonstrate compliance with rules of origin. These practices create uncertainty, increase compliance costs, and risk undermining the predictability and benefits intended under USMCA.

Heightened verification practices and inconsistent documentation requirements delay shipments, increase administrative burden, and expose U.S. exporters to potential denial of preferential tariff treatment. This reduces the efficiency of cross-border trade and weakens the value of USMCA commitments for U.S. businesses.

Recommendation: The U.S. government should engage with Mexico to strengthen customs cooperation and ensure consistent, transparent, and predictable COO verification procedures. This should include encouraging the SAT to provide clear guidance on documentation requirements, limit duplicative or excessive audits, and increase engagement with the private sector. Greater alignment and transparency will help ensure that USMCA functions as intended and that U.S. companies can fully benefit from its provisions.

Update Mexico's Prohibited and Restricted Cosmetics Substance List

Mexico has not updated its list of prohibited and restricted substances in cosmetics and personal care products since 2014, creating a lack of transparency and regulatory certainty. This undermines a core objective of USMCA—to promote regulatory transparency, predictability, and cooperation across the region. Regular updates to the list are essential to ensure clear, science-based requirements that facilitate market access for U.S. cosmetics.

Recommendation: Mexico has committed, under the Pacific Alliance, to adopt the U.S. list of cosmetic ingredients and banned substances as a reference. In line with

this commitment, Mexico should align its approach to prohibited and restricted ingredients with the United States, rather than the European Union or other countries, as the U.S. system is more risk-based and less trade restrictive. Adopting this approach would facilitate greater market access for U.S. cosmetics, reduce unnecessary regulatory barriers, and strengthen the North American manufacturing and supply chain.

Vietnam

In 2025, bilateral cosmetics trade totaled \$265 million, with U.S. exports to Vietnam reaching \$153 million. Vietnam is currently reforming its cosmetic regulatory framework and has demonstrated a willingness to consider stakeholder input, including feedback from the PCPC. However, several provisions in the draft cosmetic decree remain inconsistent with the ASEAN Cosmetic Directive and could create significant challenges for U.S. companies exporting to Vietnam. We are also concerned that, if adopted, these requirements could set a precedent and be replicated in other ASEAN countries, further amplifying their trade impact.

We would welcome the U.S. government's support in raising these concerns with the relevant Vietnamese authorities as part of the Section 301 investigation, particularly where the proposed measures may introduce unnecessary regulatory burdens or undermine regional harmonization.

In addition, we are increasingly concerned about recent actions by Vietnam's customs authorities, which have begun requesting confidential business information from ingredient suppliers and cosmetic manufacturers. This practice raises serious data protection concerns and could negatively impact U.S. commercial interests.

Vietnam's Draft Cosmetic Decree

Vietnam's draft cosmetic decree introduces several provisions that diverge from the ASEAN Cosmetic Directive and international best practices, potentially creating unnecessary technical barriers to trade for U.S. exporters. We respectfully recommend that USTR raise the following issues and advocate for the changes outlined below in its engagement with Vietnam.

Additional Mandatory Product Testing

The draft decree introduces requirements for additional product testing at GLP or ISO/IEC 17025 accredited laboratories. These requirements are duplicative of existing controls under Cosmetic Good Manufacturing Practices (GMP), which

already ensure product quality and safety through validated manufacturing processes and finished-product controls.

This measure would increase costs, delay market entry, and create unnecessary technical barriers to trade without improving consumer safety. It is also inconsistent with ASEAN practices and global norms.

Recommendation: The U.S. Government should advocate for the removal of mandatory additional testing requirements and encourage Vietnam to rely on GMP compliance and risk-based post-market surveillance in line with international standards.

Mandatory Certificate of Analysis (CoA) at Customs

Requiring a Certificate of Analysis at the time of customs clearance represents a shift toward routine pre-market testing, which is not appropriate for low-risk cosmetic products. This requirement diverges from ASEAN and global regulatory approaches that emphasize GMP compliance and post-market oversight.

The measure is likely to cause border delays, increase costs, and strain laboratory capacity without delivering proportional safety benefits.

Recommendation: The U.S. Government should advocate that Vietnam eliminate the CoA requirement at customs and instead adopt a risk-based, post-market enforcement approach consistent with ASEAN practices.

GMP Certificates and Certificates of Free Sale at Notification

The requirement to submit GMP certificates and Certificates of Free Sale (CFS) at the time of product notification duplicates existing regulatory controls and imposes unnecessary administrative burdens.

GMP certification is already embedded within ASEAN-aligned frameworks and does not require resubmission at notification. Certificates of Free Sale do not demonstrate product safety or quality; they merely confirm that a product is marketed in another jurisdiction. Increasingly, such certificates are viewed as outdated and not aligned with science-based regulatory approaches.

Recommendation: The U.S. Government should urge Vietnam to remove the requirement for GMP certificates and Certificates of Free Sale at notification for U.S. products and to focus regulatory resources on higher-value post-market surveillance

Mandatory Disclosure of Chemical Composition and CAS Numbers

Vietnam Customs authorities require importers to disclose full chemical composition, including Chemical Abstracts Service (CAS) numbers, at the point of entry.

For specialty ingredient manufacturers, these details are proprietary and constitute confidential business information developed through significant R&D investment. This requirement, in place for approximately 18 months, is being broadly applied, including formulated products incorporating proprietary technologies.

The requirement appears inconsistent with international norms for protecting confidential business information and may be more trade-restrictive than necessary to meet regulatory objectives.

This requirement adversely affects U.S. ingredient and cosmetic manufacturers in the following ways:

- **Confidentiality Risk:** Disclosure increases the risk of unauthorized use or reverse engineering.
- **Compliance Burden:** Additional safeguards, including confidentiality agreements, increase cost and complexity.
- **Trade Disruptions:** Inconsistent enforcement leads to delays and uncertainty.
- **Competitive Harm:** Exposure of proprietary formulations undermines innovation and competitiveness.

Recommendation: The U.S. Government should urge the Government of Vietnam to take steps to ensure that confidential business information is adequately protected, including by allowing for secure and confidential submissions directly to the appropriate authorities. Disclosure requirements should be limited to what is strictly necessary, with flexibility to permit reduced or generic chemical descriptions in place of full CAS-level detail where appropriate. In addition, Vietnam should ensure that Customs authorities apply requirements in a clear, transparent, and consistent manner nationwide. More broadly, import requirements should be aligned with international best practices that appropriately balance regulatory oversight with the protection of intellectual property.