



March 19, 2026

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

Dear Ambassador Greer:

The Personal Care Products Council (“PCPC”) and its members appreciate the opportunity to respond to the Office of the U.S. Trade Representative’s (“USTR”) request for comments regarding the “Design of a Plurilateral Agreement on Trade in Critical Minerals and Policy Actions To Strengthen the Resilience of Critical Mineral Supply Chains.”¹

PCPC has submitted a Business Confidential version of these comments, including Appendices A and B, to USTR. This public version summarizes PCPC’s recommendations and omits information designated as Business Confidential.

Introduction

PCPC is the leading national trade association representing the global cosmetics and personal care products industry. Founded in 1894, PCPC now includes approximately 600 member companies that manufacture, distribute, and supply the vast majority of finished cosmetics and personal care products marketed in the United States. As the makers of a diverse range of products that millions of consumers rely on and trust every day—from sunscreens, toothpaste, and shampoo to moisturizer, lipstick, and fragrance—U.S. cosmetics and personal care products companies are global leaders committed to product safety, quality, and innovation. On average, individuals use between 6 to 12 personal care products each day and consider these products as essential to their well-being, hygiene and beauty routines.

A Vital and Innovative U.S. Industry

The U.S. cosmetics and personal care products industry is one of the most dynamic and innovative industries driving the U.S. economy. Domestic personal care products manufacturing provides the majority of the products for the U.S. market. Access to global markets is critical to our industry’s success, and over the past thirty years, the U.S. cosmetics and personal care products industry typically achieved a trade surplus.

¹ [Federal Register :: Request for Comments on the Design of a Plurilateral Agreement on Trade in Critical Minerals and Policy Actions To Strengthen the Resilience of Critical Mineral Supply Chains](#)

Use of Critical Minerals in Cosmetics and OTC Drug Products

Critical minerals play an essential role in cosmetics and personal care products used by American consumers every day. In cosmetic formulations, these materials are typically used in highly refined, processed, and functionalized forms, and often in small quantities, to deliver essential performance and safety attributes, including color and opacity, UV protection, texture and sensory feel, formulation stability, and skin-protective benefits. In addition, several of these minerals are also used in over-the-counter (OTC) drug products like sunscreens, skin protectants, anticaries oral-care products, anti-dandruff shampoos, and antiperspirants.

Based on PCPC's analysis of data on the 37,000 OTC dermal and oral care drug products listed with the Food and Drug Administration (FDA) as of March 2026 and the 673,000 cosmetic products listed with FDA as of March 2025, several critical minerals appear with regularity in OTC drug and cosmetic product formulations. An illustrative table summarizing relevant minerals, representative OTC drug active and International Nomenclature Cosmetic Ingredient (INCI) names, approximate frequency of use, and reported functions is provided in **Appendix A** to the Business Confidential submission.

We recognize the national-security concerns articulated in the President's executive orders and the consultation. We understand critical minerals and their derivatives are essential to modern defense systems and critical infrastructure, and that excessive reliance on certain suppliers can create supply-chain vulnerabilities. PCPC supports efforts to bolster production and processing of critical minerals by the U.S., like-minded trading partners, and private investors.

However, it is important to distinguish between the supply of raw critical minerals for defense applications and the use of these materials in downstream consumer products such as finished cosmetics and OTC drug products. Unlike defense uses, our members rely on small quantities of highly processed, cosmetic/drug-grade materials that do not compete with strategic demands but are nonetheless essential to product safety, performance, and stability.

Cosmetics and personal care products are also highly price sensitive, particularly in mass market segments. If commodity input costs increase in response to price controls or supply restrictions on minerals used in these products, it would place additional cost pressure on U.S. manufacturers. At the same time, foreign competitors in the European Union, Japan, and Korea could continue sourcing minerals from lower cost suppliers. This dynamic would create an uneven competitive environment in which products manufactured in the United States become less competitive in both domestic and international markets.

Cosmetics and personal care companies source these materials through established global supply chains. While the quantities used in formulations are small, disruptions to access cannot easily be addressed by shifting sourcing to new suppliers. Global supply chains are increasingly complex, and it takes time to find partners capable of meeting all required standards and criteria. For many

products, there are simply not enough alternative suppliers in the United States who can meet the quality and quantity needs of the U.S. market. Further, cosmetics and OTC drugs typically are subject to a web of regulations around the globe. Our members must assess whether a new potential partner can meet the necessary safety, compliance, and certification requirements in the U.S. market, including FDA's Current Good Manufacturing Practices (GMP) regulations for drugs and forthcoming GMP regulations for cosmetics.²

For these reasons, PCPC recommends that policies designed to strengthen critical mineral supply chains be carefully targeted to defense and other strategic applications, and avoid restricting access to minerals used in downstream consumer products such as cosmetics and OTC drugs. Maintaining access to diversified global supply chains, particularly from trusted and like-minded partners, will help ensure continued availability of essential mineral-based ingredients while preserving the competitiveness of U.S. manufacturers.

PCPC also encourages the Administration to consult with downstream industries, including the cosmetics and personal care sector, as these policies are developed to ensure supply chain resilience while minimizing unintended impacts on consumer product manufacturing.

Global Supply Opportunities to Strengthen Resilience with Like-Minded Partners

PCPC encourages the United States to collaborate to increase production of critical minerals with countries identified in the U.S. Geological Survey (USGS) Mineral Commodity Summaries (2026).³ A list of the countries that, in addition to the United States and China, are identified by USGS as major producers or holding significant reserves of the critical minerals used in cosmetics and OTC drug products is provided in **Appendix B** to the Business Confidential submission.

Expanding partnerships with these producers can help diversify supply chains, strengthen resilience, and ensure continued access to essential mineral-based ingredients without disrupting downstream manufacturing industries.

Conclusion

PCPC appreciates this opportunity to present information and viewpoints for consideration as the Administration considers creating a Plurilateral Agreement on Trade in Critical Minerals. We would be pleased to provide additional information and clarification of any of the points raised. For further information about the information presented, please contact Jon Hicks, Senior Director of International Trade and Regulatory Affairs, PCPC at hicksj@personalcarecouncil.org.

² FDA [Current Good Manufacturing Practice \(CGMP\) Regulations](#) and [Modernization of Cosmetics Regulation Act](#)

³ USGS [Index of /pubs/periodicals/mcs2026](#)



We look forward to additional opportunities to discuss the impact of U.S. policies on our industry and to support initiatives that would strengthen and create new global market opportunities for our member companies.

Sincerely,

A handwritten signature in black ink that reads "Heather Helm".

Heather Helm
Executive Vice President, Global Strategies