Personal Care Products Council

July 10, 2026

Mr. Terry McCartin
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China, Mongolia, and Taiwan Affairs
Office of the United States Trade Representative
600 17th Street NW
Washington, DC 20508

Re: USTR– 2026–0430 entitled "Request for Comments on the Scope and Operation of a Mechanism to Promote Reciprocal Managed Trade with China."

Introduction: Cosmetics Can Deliver Early, Measurable Wins Under the U.S.-China Board of Trade

The Personal Care Products Council (PCPC) welcomes the opportunity to provide comments in response to USTR's request for input on the scope and operation of a mechanism to promote reciprocal managed trade with China.[1] Cosmetics and personal care products represent a practical, non-sensitive sector capable of delivering early, measurable results for U.S. manufacturers under the proposed U.S.-China Board of Trade.

The U.S. cosmetics and personal care products industry is a major driver of American manufacturing, innovation, and jobs. It generates $495.6 billion in economic output, contributes $242.4 billion to U.S. GDP, supports more than 2.6 million American jobs, generates $136.6 billion in tax revenues, and invests more than $1.3 billion annually in U.S. research and development. U.S. cosmetics and personal care exports reached $15.8 billion in 2025, up from $12.2 billion in 2015, reflecting growing global demand for American brands.[2] China is the industry's third-largest export market, and fair market access would help grow U.S. cosmetics exports and support American workers.

PCPC and its member companies support strong, science-based regulations that protect consumers, advance innovation, and build confidence in safe and effective products. We recognize that regulations must serve legitimate health and safety objectives and that well-designed oversight is essential to maintaining public trust. At the same time, regulations should

[1] Office of the United States Trade Representative (USTR), *Request for Comments on the Scope and Operation of a Mechanism to Promote Reciprocal Managed Trade with China*, Federal Register Notice, Docket No. USTR-2026-0430 (June 2, 2026).
[2] Personal Care Products Council, *Beyond Beauty: The Economic and Social Contributions of the U.S. Personal Care Products Industry (2026).*

be appropriately tailored to risk, transparent in application, and consistent with international best practices.

In China, several requirements affecting cosmetics diverge significantly from those in other major markets and appear disproportionate to the relatively low health and safety risks posed by cosmetics when compared with sectors such as pharmaceuticals and medical devices. These divergences create practical market access challenges for U.S. companies and would be best addressed by including cosmetics in the U.S.-China Board of Trade. Specifically, China's GMP certificate requirement for animal testing exemptions, duplicative efficacy testing mandates, and burdensome rules for low-risk registration updates create unnecessary obstacles that weaken the competitiveness of U.S.-based manufacturers. USTR should press China for concrete, enforceable commitments to address these barriers and ensure that regulatory requirements advance legitimate safety goals without unnecessarily restricting fair and reciprocal trade. Removing these three barriers would increase U.S. cosmetics exports to China by an estimated 27%, with benefits likely even greater because the modeling does not fully capture companies deterred from entering China at all.

Cosmetics and personal care products are ideally suited for early action under the U.S.-China Board of Trade because they are widely used, non-sensitive consumer products that raise few, if any, economic or national security concerns. As envisioned by USTR, the Board of Trade should focus on optimizing trade in non-sensitive products by promoting reciprocity, balance, and durable commercial outcomes. For the cosmetics sector, the greatest opportunity lies not only in reciprocal tariff treatment, but also in eliminating China's deeply entrenched market access barriers and improving regulatory transparency. Removing unnecessary regulatory requirements would expand market access for U.S. exports, strengthen U.S. manufacturing, support American workers, and deliver concrete, enforceable trade outcomes consistent with the objectives of the Board of Trade.

America should be winning in China's fast-growing beauty market, but today we are falling behind. In 2025, U.S. cosmetics and personal care exports to China totaled $1.1 billion, compared with exports to China of $3.45 billion from the European Union, $2.24 billion from Japan, and $2.05 billion from Korea. At the same time, the United States imported about $1.04 billion in these products from China, resulting in a modest trade surplus of about $60 million that should be expanded by exporting more products manufactured in the United States abroad.

This disparity is not the result of weak demand for products manufactured in the United States. It reflects an uneven competitive environment shaped by unfair market access conditions, burdensome regulatory requirements, and the absence of sustained U.S. government engagement to ensure that manufacturers in the U.S. can compete on fair and reciprocal terms. Chinese

producers benefit from lower domestic compliance costs, industrial support, and excess production capacity, while manufacturers in the U.S. face higher production costs at home and costly barriers to selling products in China. As a result, U.S. exports face significantly greater regulatory and market access obstacles in China.

PCPC calls on USTR to make cosmetics and personal care products an early priority under the U.S.-China Board of Trade by:

- Securing zero-tariff treatment from China for U.S.-manufactured finished cosmetic and personal care products classified under the relevant HTSUS codes listed in Annex II.[3]
- Obtaining a bilateral commitment that finished U.S. cosmetic and personal care exports will not be subject to retaliatory tariffs. Cosmetics and personal care products are routinely among the first consumer goods targeted during trade disputes, despite having little strategic significance. Exempting these products from future retaliation would protect American exporters, preserve U.S. jobs, and prevent unnecessary price increases for consumers in both countries.
- Providing targeted U.S tariff relief for manufacturing inputs (Annex I) that are not commercially available in the United States to support U.S. manufacturing activity while allowing time for those manufacturers to identify commercially viable alternative suppliers or establish domestic production capacity sufficient to support U.S. downstream manufacturing. Many of these highly specialized cosmetic ingredients and manufacturing inputs are currently sourced from China because global production has become concentrated there over time. Temporary tariff relief will allow U.S.- based manufacturers to maintain production, preserve U.S. jobs, and strengthen more resilient and diversified supply chains rather than disrupting U.S. manufacturing.
- Eliminating priority market access and regulatory barriers affecting U.S. exports.

The Board of Trade should address both sides of the competitiveness equation: removing barriers that keep U.S. exports out of China and reducing unnecessary costs on the inputs needed to manufacture those products in the United States.

Tariff Relief for Unavailable Inputs Is Essential to U.S. Export Competitiveness

Expanding exports requires policies that strengthen the competitiveness of manufacturing in the U.S. PCPC's analysis of nearly one million cosmetic products listed with FDA found that 42.1% of cosmetic ingredients used by U.S.-based manufacturers cannot currently be sourced domestically or at commercial scale. These include specialty ingredients, functional raw

[3] U.S. International Trade Commission (USITC), *Harmonized Tariff Schedule of the United States*, Chapter 33

materials, packaging components, and other essential inputs required to manufacture innovative, high-quality products in the United States.

When these inputs cannot be sourced domestically or at scale, tariffs increase production costs without creating new American sources of supply. Those costs make U.S.-manufactured products less competitive in global markets and reduce export opportunities. Targeted tariff relief for the representative inputs listed in Annex I would lower production costs, support additional investment in U.S. manufacturing, and improve competitiveness of U.S. exports.

Manufacturers are committed to producing, investing, and exporting from the United States. By reducing unnecessary costs on manufacturing inputs and securing the removal of unfair market access barriers in China, the U.S. government can help ensure companies remain globally competitive. These targeted actions will strengthen manufacturing, support American workers, expand exports, and encourage companies to continue investing and growing production here at home.

Targeted tariff relief is essential, but it will not fully unlock export growth and unleash the full potential of U.S. exports or U.S. based manufacturing unless China's regulatory and market access barriers are addressed in parallel. Zero-tariff treatment for finished cosmetic and personal care products exported to China (Annex II), paired with targeted input relief and barrier removal, may decrease production costs, expand exports, improve the bilateral trade balance, and strengthen our manufacturing helping us compete and win.

China's Regulatory Reforms Create a Strategic Opening

For U.S.-based cosmetics manufacturers or exporters, China's regulatory and market access barriers are not simply technical obstacles. They are competitive barriers that raise costs on products, delay U.S. exports, and give Chinese producers an advantage in one of the world's largest consumer markets. These barriers should be a priority for resolution through the U.S.-China Board of Trade.

Over the past decade, China has built one of the world's most burdensome cosmetics regulatory systems. The 2020 Cosmetics Supervision and Administration Regulation (CSAR) initially appeared to move China toward a more modern, science-based, and flexible framework. In practice, however, the implementing measures adopted since then have added more layers of review, more duplicative requirements, and more uncertainty for companies trying to compete in China.

Today, cosmetics in China are regulated through overlapping requirements that extend across the full product lifecycle. Finished products must be notified as ordinary cosmetics or registered as

special cosmetics, depending on the claims made[4]. Under either pathway, companies must submit multiple sets of information covering the same safety and quality issues, including toxicological, microbiological, physicochemical, and other specialized testing, together with comprehensive safety assessments that often duplicate data already generated for other major markets. For example, a U.S. manufacturer exporting a facial moisturizer may already have conducted toxicological, microbiological, stability, and preservative testing and prepared a comprehensive product safety assessment yet must submit much of the same information again to satisfy China's notification requirements[5]. Products making functional claims, such as sunscreen, must also submit extensive efficacy substantiation, including scientific literature, consumer perception surveys, human clinical studies, or animal testing some of which must be generated in China[6]. For example, a sunscreen manufacturer may already have robust clinical SPF and water-resistance studies accepted in other markets but still be required to provide additional China-specific documentation or testing to support the same efficacy claims.

Manufacturing requirements add another burden. Domestic manufacturers must obtain Chinese Good Manufacturing Practice (GMP) licenses, while imported product applicants must prove compliance with GMP requirements in their manufacturing jurisdiction and may later face overseas inspections to verify compliance with China's GMP standards[7]. This creates additional uncertainty for U.S.-based manufacturers or exporters even when their products are safely made in highly regulated American facilities.

Ingredient regulation operates as a separate system that can further block or delay U.S. exports. New cosmetic ingredients must undergo their own filing or registration process, often requiring the same types of data packages and testing required for finished products[8]. Even after approval, or after becoming an existing ingredient following a three-year monitoring period, most ingredient suppliers must submit extensive safety and quality information through a separate electronic platform[9]. Product manufacturers must then cross-reference those submissions with each product application. China is also considering separate environmental registrations for certain new chemicals that are also cosmetic ingredients in finished imported products, adding another non-CSAR barrier that could raise costs and disrupt supply chains.[10]

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[4] CSAR (2020), Article 4.
[5] Provisions for the Administration of Cosmetics Registration and Filing Dossiers (2021), Article 33.
[6] Technical Specification for the Evaluation of Cosmetic Efficacy Claims (2021), Articles 8-12.
[7] CSAR (2020), Articles 19 & 27.
[8] Provisions on the Registration and Filing of New Cosmetic Ingredients and Dossier Management (2026), Article 8.
[9] Announcement of the National Medical Products Administration on Matters Concerning the Further Optimization of Cosmetic Ingredient Safety Information Management Measures (2023).
[10] Measures for the Environmental Management Registration of New Chemical Substances (Revised Draft for Comment) (2026).

These requirements are only part of a broader system that makes it harder for our members to compete. U.S. exporters must also navigate China-specific labeling rules, restrictive claims requirements, ingredient naming conventions that differ from international practice, extensive post-market obligations, and limited recognition of internationally accepted standards. Together, these requirements increase compliance costs, slow innovation, delay product launches, and create disproportionate barriers for imported products while providing limited additional benefit to consumer safety.

China has recognized that its current system is creating implementation challenges and has launched a comprehensive reform initiative, *Opinions on Deepening the Reform of Cosmetics Supervision and Promoting High-Quality Industrial Development* (2025)[11], to modernize CSAR implementation.

This is a strategic moment for the United States. China is studying how cosmetics are regulated in other major markets to support its domestic companies and grow Chinese cosmetic exports around the world. Chinese regulators acknowledge that the current framework is administratively burdensome and are looking for ways to improve regulatory efficiency, encourage innovation, streamline administrative procedures, and align more closely with international best practices. The U.S. needs to ensure this appetite for reform is seized to benefit U.S. exporters and manufacturers.

The reforms under consideration make immediate U.S. engagement essential. China is evaluating changes that could reduce animal testing requirements, improve registration and record-filing procedures, expand electronic labeling, allow greater flexibility in efficacy substantiation, strengthen international regulatory cooperation, and shorten review timelines through better coordination among government authorities. Based on past practice, reform cycles for cosmetics framework regulations can take anywhere from 6 to 30 years, making it critical for the United States to engage now while China is actively considering changes. Other governments are already working with China to ensure their companies can sell into the Chinese market on better terms. The United States cannot stand back while China writes the rules, and foreign competitors shape the outcome. USTR should engage now, while Chinese regulators are still deciding how to revise CSAR and related measures, to press for reforms that open China's market to our products on fair and reciprocal terms.

China is using cosmetics reform to build national industrial strength. NMPA says the goal is to accelerate China's shift from a "major cosmetics producer" to a "strong cosmetics power" and

[11] NMPA's Opinions on Deepening the Reform of Cosmetics Regulation and Promoting High-Quality Industry Development

increase the public's "sense of gain, happiness, and security" in cosmetics[12]. The United States should take China at its word. USTR should use this moment to demand reciprocal access and ensure U.S.- based manufacturers and U.S. exporters are not locked out while China strengthens its own champions.

The U.S. should demand fairness and reciprocity. China should not enjoy broad access to the American market while maintaining regulatory obstacles that limit U.S. exports. The goal should be straightforward: level the playing field, open China's market to more U.S. exports, strengthen U.S. manufacturing, and ensure that American workers and U.S. based manufactures can compete and win.

Foreign Governments are Supporting Their Industry

The European Union, and the United Kingdom maintain formal bilateral dialogues with China on cosmetics and personal care products to reduce technical barriers, improve market access, and influence regulatory policy before new requirements are finalized, helping their manufacturers gain an edge over ours.

In 2025, the European Union exported more than three times as many cosmetics and personal care products to China as the United States. Japan exported roughly twice as much, and Korea exported nearly twice as much. U.S.-based manufacturers should not be losing in a growth market where U.S. brands and U.S. innovation can win when the playing field is fair.

The United States needs to push the door open for U.S. based cosmetics manufacturers and exporters. Establishing cosmetics as a priority under the Board of Trade would help restore fair competition, address unfair regulatory barriers, support exporters, and ensure that the United States is shaping the rules rather than reacting to decisions made by China and our competitors.

This would give USTR the tool it needs to defend American commercial interests, press China to remove priority market access barriers, share U.S. regulatory experience, and push for reforms that protect consumers while cutting unnecessary costs for U.S. exports.

The following priority market access barriers should be addressed through this initiative to deliver concrete wins for our industry. These barriers stated should be addressed because each limits the ability of our members to compete and grow exports to China. China's GMP certificate requirement for the animal testing exemption uniquely discriminates against U.S. based manufacturers by conditioning market access on a government-issued cosmetic GMP certificate. The United States does not issue a federal or local cosmetic GMP certificate. China's duplicative

[12] National Medical Products Administration (NMPA), *Policy Interpretation of the "Opinions of the National Medical Products Administration on Deepening Cosmetics Regulation Reform and Promoting High-Quality Industry Development*

efficacy testing requirements and burdensome rules for low-risk formulation updates drive up costs, delay market entry, and make it harder for products manufactured in the United States to reach Chinese consumers. Eliminating these barriers would strengthen the competitiveness of U.S based manufacturers, support American jobs, and ensure U.S. based companies compete on a level playing field in one of the world's largest consumer markets.

Priority Market Access Barriers

Animal Testing

China's animal testing requirements remain one of the most significant barriers facing U.S.-based cosmetics manufacturers. Cosmetic companies are leaders in cruelty-free innovation; the industry strongly opposes animal testing, many companies have signed pledges against it, and consumers increasingly reject products tested on animals. Yet China still makes access to its market harder by tying animal testing exemptions to documentation the U.S. FDA does not issue.

General cosmetics, such as certain shampoos and color cosmetics, may qualify for animal testing exemptions only if, among other criteria, applicants submit a government-issued GMP certificate from a cosmetics regulator [13]. Because the U.S. FDA is one of the only major regulators that does not issue a federal cosmetic GMP certificate, many U.S.-based manufacturers are blocked from using exemptions available to foreign competitors Some states issue GMP certificates to companies, but China does not always accept them. China is now considering reforms that could reduce animal testing requirements for certain special cosmetics, including products such as hair dyes and sunscreens, but the GMP certificate requirement would still prevent many companies based in the U.S. from fully benefiting from those changes.

This is a clear example of a foreign regulatory requirement that discriminates against manufacturers and suppresses U.S. exports. Eliminating China's mandatory GMP certificate requirement for all cosmetics, including general cosmetics, special cosmetics, and products containing new ingredients, would increase U.S. exports to China by 25.9 %. Even under a more limited reform, eliminating the GMP certificate requirement only for general cosmetics seeking an exemption from mandatory animal testing, U.S. exports to China would still increase by 11.73 %. These findings demonstrate that China's GMP certificate requirement is one of the most commercially significant regulatory barriers facing U.S. based cosmetics manufacturers and exporters and should be a top priority for the U.S.-China Board of Trade.

China recently issued a new rule that appears to allow non-animal testing methods to support new cosmetic ingredient applications, including internationally accepted methods where alternative methods have not yet been incorporated into Chinese standards. This could be a

[13] Provisions for the Administration of Cosmetics Registration and Filing Dossiers (2021), Article 33.

positive step, but only if it is implemented in a way that allows companies to use these methods regularly in the ingredient registration and filing process[14]. Without a practical pathway to avoid animal testing for new ingredients, any product-level exemption will remain limited and many American innovations will still face unnecessary barriers before they can reach Chinese consumers.

China should recognize alternative evidence of manufacturing quality and fully permit validated non-animal testing methods for ordinary cosmetics, special cosmetics, and new cosmetic ingredient applications[15]. Doing so would remove an unfair barrier, align China with modern science and consumer expectations, and help U.S.-based manufacturers and exporters compete and win without compromising safety or animal welfare.

Registration and Record-Filing Requirements

China imposes extensive pre-market requirements for both ordinary and special cosmetics, including toxicology, microbiological, physicochemical, and other specialized testing, together with comprehensive safety assessments that often evaluate the same underlying information[16].

China has identified improving registration and record-filing efficiency as one of the central pillars of its reform initiative. USTR should encourage reforms that eliminate duplicative data requirements, simplify ingredient documentation, permit equivalent in-house testing for imported products, and streamline administrative procedures without compromising safety.

For imported products, China requires certain testing to be conducted by China Metrology Association (CMA) accredited laboratories in China, which can create long delays because of limited laboratory capacity[17]. Domestic ordinary cosmetics may have greater flexibility to use in-house testing, giving Chinese producers a practical advantage over U.S. exporters. China should either eliminate duplicative testing requirements altogether and rely on the robust safety assessments that are already required or allow imported products to rely on equivalent in-house testing on the same terms available to domestic producers.

The data make the case for action: these unnecessary requirements are holding back exports and giving competitors an advantage in China. Eliminating China's efficacy testing requirements as part of broader reform would increase U.S. exports by 5.78%. USTR should press China to

[14] Technical Guidelines for the Registration and Filing Dossier of New Cosmetic Ingredients (2026).
[15] Provisions for the Administration of Cosmetics Registration and Filing Dossiers (2021), Article 33.
[16] Provisions for the Administration of Cosmetics Registration and Filing Dossiers (2021), Article 33.
[17] Announcement on Matters Relating to the Optimization of the Management for Testing of Ordinary Cosmetics for Record-Filing (2023).

remove these barriers so our products can compete on fair terms, expand market share, and deliver more wins for U.S.-based manufacturers, workers, and exporters.

This reform may also strengthen U.S. production at home. Additional China-bound exports translate into increased demand for American manufacturing, including finished products, raw materials, packaging, logistics, testing, and related business services. USTR should make clear that cutting China's duplicative testing barriers is not a concession to China. It is a way to sell more products into China and support more economic activity in the United States because, currently, the only way around them is to manufacture locally.

China should also push forward with its proposed reforms to eliminate or significantly simplify the separate ingredient safety information platform. In addition to the safety assessment, test reports, and related information required to support new ingredients, ingredient suppliers must submit significant safety and quality information through a separate web platform[18]. When a manufacturer files or registers a finished cosmetic product, it must cite the ingredient's index number from that database and ensure that the product application is consistent with the supplier's separate submission. This duplicative process increases costs, creates avoidable compliance risk, and delays exports without improving product safety. As China itself has suggested in a recent document, the system should be eliminated altogether, and manufacturers should instead be permitted to maintain this documentation and make it available upon request.

Post-Market Regulatory Burdens

China adopted a record-filing system for ordinary cosmetics that should function as a simple notification system. Under China's regulations, general cosmetics, such as certain shampoos and color cosmetics, are permitted to launch once filing materials are deemed complete. In practice, however, authorities often conduct lengthy substantive reviews after the filing is accepted and the product is already on the market, then request changes to claims, labeling, or other materials[19]. This creates commercial uncertainty, disrupts sales, and imposes unnecessary costs on exporters.

If a product is later deemed non-compliant because of minor issues, the filer may be forced to pull existing products from the Chinese market or undertake costly remediation measures, even where there is no genuine safety concern. China should adopt a true notification system for ordinary cosmetics and rely on targeted post-market enforcement when a product presents real

[18] Announcement of the National Medical Products Administration on Matters Concerning the Further Optimization of Cosmetic Ingredient Safety Information Management Measures (2023).
[19] Administrative Measures for the Registration and Notification of Cosmetics (2021), Article 34.

safety risks. That approach would protect consumers while reducing red tape that keeps-products from competing on fair terms.

China should also cut the red tape that keeps safe products from moving quickly in the market. Today, companies must update filings when raw material suppliers change, even if the ingredient itself does not, and small ingredient-percentage changes that do not affect safety or quality can trigger a full re-registration or burdensome administrative process. That is not smart regulation. It is a needless barrier to U.S. based exports. Fully streamlining routine and low-risk formulation and raw-material updates would increase U.S. exports to China by an estimated 2.34%. China should permit minor formulation adjustments through a simple notification pathway so products can stay on shelves, reach consumers faster, and compete to win.

Alignment with International Standards

China continues to diverge from internationally recognized regulatory practices in areas including ingredient nomenclature, labeling, testing, manufacturing standards, and overseas inspections. For example, China does not fully adhere to the International Nomenclature of Cosmetic Ingredients (INCI), the globally recognized system that provides standardized ingredient names to facilitate international trade, regulatory compliance, and consumer transparency[20]. China's labeling rules can also force companies to develop China-specific packaging or cover foreign-language packaging, adding cost and complexity for U.S. exporters[21].

Products and ingredients made outside China must comply with Chinese standards, yet China does not routinely accept other countries' testing, formulation, production, or ISO standards unless they are incorporated into China's own rules, sometimes in older or modified form. This forces U.S. based manufacturers or companies to meet both the standards of their manufacturing jurisdiction and separate China-only requirements, adding cost, delay, and uncertainty. China should accept international standards, including ISO standards, so safe, high-quality products are not blocked by duplicative red tape.

China also applies its cosmetic GMP rules to imported products with little guidance on how to resolve conflicts between U.S. manufacturing practices and China's requirements. It has begun inspecting overseas facilities without clear cosmetics-specific procedures, even though it has adopted such procedures for drugs and medical devices[22]. This creates uncertainty over what inspectors are verifying and exposes companies to severe penalties, including import blocks and costly remediation. China should accept credible inspections by qualified foreign authorities or

[20] See Provisions for the Administration of Cosmetics Registration and Filling Dossiers (2021), Article 29
[21] Measures for the Administration of Cosmetics Labels (2021), Article 6.
[22] *See* Provisions for the Administration of Overseas Inspection of Drugs and Medical Devices (2018).

private bodies and adopt clear rules for overseas cosmetics producers, protecting consumers while giving companies a fair shot to compete and win.

China's stated goal of aligning with international practices creates a clear opening for USTR to press for acceptance of INCI terminology, ISO standards, electronic labeling, internationally accepted scientific approaches, and credible foreign inspections. These reforms would cut unnecessary barriers, strengthen reciprocal access, and help products compete on fair terms in China.

Environmental Registration for New Chemical Substances Outside CSAR

A separate barrier outside CSAR is emerging under China's Ministry of Ecology and Environment (MEE). MEE's revised draft Measures for the Environmental Management Registration of New Chemical Substances[23] could eliminate the long-standing exemption for new chemicals registration for new chemicals contained in finished cosmetic products. That would add another China-only regulatory layer on top of NMPA oversight, creating new costs, supply chain disruption, and delays for U.S. based exporters without a clear environmental benefit.

MEE should keep the current exemption for new chemicals contained in finished cosmetic products. Finished cosmetics have limited environmental exposure, are already regulated by NMPA, and do not need duplicative chemical registration to be safely and effectively overseen. This added requirement is not mandated by China's Ecological Environment Code and would only make it harder for safe, high-quality products to reach Chinese consumers.

If MEE does not maintain the exemption, any requirements for cosmetic products should be risk-based (e.g., accomplished through notifications), commercially practical, and limited to what is necessary. MEE should allow automatic registration based on cosmetic ingredient approval, preserve the existing record-filing pathway for substances below one ton, maintain proportionate data requirements for substances between one and ten tons, and confirm that registered chemicals are added to the Inventory of Existing Chemical Substances in China frequently. These safeguards would reduce unnecessary barriers, protect supply chains, and give our members a fair chance to compete and win in China.

[23] Measures for the Environmental Management Registration of New Chemical Substances (Revised Draft for Comment) (2026).

Conclusion

The proposed U.S.-China Board of Trade should deliver measurable commercial wins for the United States, and cosmetics and personal care products are well positioned for early action.

China is rewriting its cosmetics regulatory framework now. The United States should be at the table before those rules are finalized, ensuring they expand opportunities for U.S. based manufactured products rather than giving foreign competitors an advantage.

PCPC urges USTR to include cosmetics in the Board of Trade to secure tangible wins for manufacturers, workers, and consumers. The initiative should secure zero and reciprocal tariff treatment for finished cosmetic and personal care products; obtain a bilateral commitment that these everyday consumer products will not be subject to future retaliatory tariffs, protecting American exporters and helping keep essential products affordable for families; provide targeted temporary tariff relief for manufacturing inputs that are not commercially available in the United States until suitable alternative supply chains or domestic production are established.

These actions would strengthen American manufacturing while reducing dependence on China over the long term. Removing unnecessary barriers and lowering costs for essential manufacturing inputs will help expand U.S. exports, invest in domestic production, create American jobs, and build more resilient supply chains.

PCPC stands ready to support USTR with technical expertise, regulatory experience, and industry engagement to help translate these priorities into tangible results.

The United States should not allow cosmetics to become collateral damage in future trade disputes or allow China to write the rules for one of the world's largest consumer markets. This is an opportunity to expand U.S. exports, strengthen domestic production, reduce the trade deficit, and secure lasting commercial advantages for the U.S. economy.

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 Obermann, Vice President, Global Strategies at ObermannN@personalcarecouncil.org

Sincerely,

Heather Helm
Executive Vice President, Global Strategies

Annex I: Representative Inputs Not Available Domestically or at Commercial Scale

The following non-exhaustive list identifies cosmetic inputs and packaging components sourced from China that are relevant to U.S. cosmetic and personal care product manufacturing. The list reflects HTS codes, representative inputs or components, product categories, and potential cosmetic uses.

HTS Code	Representative Cosmetic Input or Packaging Component	Category	Potential Use
0508.00.0000; 1302.12.0000; 1302.19.9140; 1302.32.0000; 1302.32.0020; 1702.30.2800	Pearl powder; licorice root extracts; aloe, green tea, mushroom, seaweed, rosemary, white mulberry, and other botanical extracts; guar gum and derivatives; dextrose anhydrous	Botanical Extracts and Plant Materials	Toothpastes, oral care, skin care, moisturizers, face makeup, eye makeup, hair care, shampoos, body cleansers, hair coloring, and cleansing products
1513.21.0000; 1515.90.8110; 1515.90.8190; 1521.90.2000	Palm kernel oil; cannabis sativa seed oil; acai, argan, avocado, camellia, coffee, cranberry, meadowfoam, moringa,	Fats, Oils and Waxes	Body cleansers, bath soaps, skin care, hair care,

	pomegranate, sweet almond, grape seed, and other specialty plant oils; beeswax		moisturizers, body lotions, face makeup, hair coloring, lipsticks, and eye makeup
2526.20.0000; 2804.69.5000; 2805.19.9010; 2811.19.6100; 2825.80.0000; 2828.90.0000; 2835.10.0000; 2837.90.9000; 2842.10.0000	Talc; silicon feedstock; lithium; sulfamic acid; antimony oxide; halide salts; sodium phosphonate; inorganic salts; synthetic fluorphlogopite; zeolite	Minerals, Clays and Inorganic Chemicals	Eye shadows, face makeup, eye makeup, skin care, nail care, nail polishes, hair care, body cleansers, bath soaps, lipsticks, and hair coloring
2903.43.1000 through 2940.00.6000; 2914.50.5000	Fluoroethane propellant; linalool; nerolidol; menthol; inositol; benzyl alcohol; resorcinol; chloroxylenol; aldehydes; vanillin; camphor; butyl methoxydibenzoylmethane; sodium benzoate; citric acid; mandelic acid; salicylic acid; hair dye intermediates; EDTA; ceramide-related ingredients; octocrylene; urea; panthenol; vitamin C derivatives; vitamin E derivatives; biotin; niacinamide; glycyrrhetinic acid; glycosides; sugar derivatives	Organic Chemicals and Vitamins	Perfumes, fragrances, skin care, face creams, moisturizers, hair care, hair dyes, hair coloring, body cleansers, bath preparations, oral care, lipsticks, nail care, nail polishes, eye makeup, suntan products, and shaving products
3204.19.3500; 3206.49.6050	Astaxanthin; mica-based color pigments; synthetic fluorphlogopite pigments; titanium dioxide pigment blends; iron	Colorants and Pigment Preparations	Lipsticks, face makeup, eye makeup,

	oxide pigment blends; pearlizers; bismuth oxychloride and related color pigment preparations		eye shadows, nail care, skin care, moisturizers, and hair care
3301.29.1000; 3301.29.5150; 3302.90.1050	Eucalyptus oils; essential oils; botanical aromatic oils; tea tree oil; ginger root oil; camphor extracts; fragrance compounds; methyl anthranilate; fragrance and flavor blends	Essential Oils and Fragrances	Perfumes, fragrances, skin care, hair care, body cleansers, bath preparations, moisturizers, and face makeup
3402.13.2010; 3402.42.0000; 3402.90.5050; 3504.00.5080; 3507.90.7000; 3808.90.3000; 3808.99.3000; 3808.99.9501; 3824.99.4100	Laureth-6; surfactants; surfactant preparations; enzymes; glucose oxidase blends; biocides; preservatives; polyaminopropyl biguanide; hydrogen peroxide; fatty substance mixtures	Surfactants, Enzymes, Preservatives and Industrial Preparations	Hair care, skin care, hair coloring, body cleansers, bath soaps, false lashes, eye makeup, wipes, oral care, moisturizers, face creams, and other cosmetic products
3902.10.0000; 3902.30.0000; 3905.30.0000; 3906.90.5000; 3907.61.0000; 3907.69.0000; 3912.39.0000; 3913.90.2015; 3913.90.2090	Polypropylene resins; polyvinyl alcohol; acrylates copolymers; carbomer; polyquaternium ingredients; sodium polyacrylate; PET resins; cellulose derivatives; sodium hyaluronate; natural polymers and polysaccharide derivatives	Polymers and Film Formers	Eye makeup, face makeup, eye shadows, lipsticks, nail care, skin care, hair care, body cleansers, nail polishes, false lashes, and hair coloring

3921.13.5000 through 3926.90.9989; 4202.11.0090 through 4202.92.9000; 4202.12.8170; 4202.92.9700	Polyurethane film and sheets; plastic sheets and films; plastic bags, pouches, bottles, containers, jars, tubes, caps, lids, droppers, closures, compact cases, lipstick components, mascara and brow components, spatulas, electronic dispenser housings, cosmetic cases, travel cases, and cosmetic bags	Packaging — Plastic, Cases and Containers	Packaging
4804.39.4041 through 4911.99.8000; 5806.32.1030; 6305.33.0050; 6307.90.9891	Kraft paperboard; coated paperboard; corrugated boxes; folding cartons; rigid boxes; paperboard packaging; liners; paper inserts and dividers; printed cards and inserts; decorative ribbon; bags; textile accessories	Packaging — Paper, Paperboard, Textile and Fiber	Packaging
6215.20.0000	Ties, bowties, and cravats used as decorative packaging accessories, promotional accessories, or product presentation components	Packaging — Textile Accessories	Packaging and promotional presentation
7010.90.2040 through 7018.20.0000; 7310.21.0080; 7603.10.0000; 7612.90.1030; 7612.90.1090; 7612.90.5000; 7616.99.5190; 8007.00.5000	Glass perfume and cosmetic containers; glass bottles; laboratory glassware; decorative glass beads; steel aerosol cans and tanks; aluminum powder; aluminum containers; aluminum articles; tin containers	Packaging — Glass and Metal	Packaging
8214.10.0000; 8413.20.0000; 8413.91.9000; 8424.20.1000; 8424.89.7090; 8424.89.9000; 8424.90.9080; 8439.30.0000; 8506.10.0000; 8509.80.5045; 8523.52.0090;	Cosmetic tools and blades; hand pumps; pump parts; piston pump sprays; mechanical sprays and dispensers; cosmetic pumps; spray mechanisms; electronic dispenser components; electromechanical beauty devices and components; smart cards; electronic dispensers; LED vanity or compact lights; cosmetic brushes; brushes and sponges; cosmetic application brushes;	Packaging — Dispensing, Application, Electronic and Other Components	Packaging

9303.01.2400; 9405.11.4020; 9603.29.8090; 9603.30.2000; 9603.30.6000; 9615.90.2000; 9616.20.0000; 9903.01.2000; 9903.01.2300; 9903.01.2400	nonthermal hair curling devices; powder puffs and pads		

Annex II: Representative Finished Cosmetic and Personal Care Products Exported to China

The following non-exhaustive list identifies representative finished cosmetic and personal care products exported from the United States to China. The list reflects representative HTS classifications that include key cosmetics products as well as related cosmetic application accessories commonly sold with or used in connection with finished cosmetic products.

HTS Code	**Representative Finished Cosmetic Product**	**Category**	**Representative Products**
3303.00	Perfumes and toilet waters	Fragrances	Perfumes, eau de parfum, eau de toilette, fragrance mists, body sprays
3304.10	Lip makeup preparations	Color Cosmetics	Lipsticks, lip glosses, lip oils, lip stains, lip balms with cosmetic claims
3304.20	Eye makeup preparations	Color Cosmetics	Mascara, eyeliner, eye shadow, brow products, eye primers
3304.30	Manicure and pedicure preparations	Nail Care	Nail polish, gel polish, nail treatments, nail hardeners, cuticle products
3304.91	Face powders	Face Makeup	Pressed powders, loose powders, setting powders, finishing powders

HTS Code	Representative Finished Cosmetic Product	Category	Representative Products
3304.99	Other beauty, makeup and skin care preparations	Skin Care and Face Makeup	Moisturizers, facial cleansers, serums, toners, facial masks, sunscreens, primers, foundations, concealers, blushes, bronzers, highlighters, anti-aging creams, exfoliants, facial oils
3305.10	Shampoos	Hair Care	Shampoos, medicated cosmetic shampoos, color-safe shampoos
3305.20	Preparations for permanent waving or straightening	Hair Treatments	Hair relaxing products, perm solutions, straightening systems
3305.30	Hair lacquers	Hair Styling	Hair sprays, finishing sprays
3305.90	Other hair preparations	Hair Care	Conditioners, leave-in conditioners, styling creams, mousses, gels, waxes, hair oils, hair masks, dry shampoos, heat protectants, hair color products
3306.10	Dentifrices	Oral Care	Toothpaste, whitening toothpaste, sensitivity toothpaste
3306.20	Dental floss	Oral Care	Dental floss, floss picks
3306.90	Other oral or dental hygiene preparations	Oral Care	Mouthwash, breath fresheners, whitening gels, oral rinses
3307.10	Pre-shave, shaving and after-shave preparations	Men's Grooming	Shaving creams, shaving foams, aftershave lotions, shave gels
3307.20	Personal deodorants and antiperspirants	Personal Care	Roll-ons, sprays, sticks, creams

HTS Code	Representative Finished Cosmetic Product	Category	Representative Products
3307.30	Perfumed bath salts and other bath preparations	Bath and Body	Bath salts, bath bombs, bubble baths, bath oils, shower products
3307.90	Other perfumery, cosmetic or toilet preparations	Personal Care	Makeup removers, feminine hygiene products with cosmetic claims, body mists, foot care products, depilatories, cosmetic wipes, hand sanitizers with cosmetic claims where applicable
3401.30	Organic surface-active products and preparations for washing the skin	Skin Cleansing	Body washes, facial cleansers, shower gels, liquid hand soaps, cleansing creams

Related Cosmetic Application Accessories (Frequently Exported with Finished Cosmetic Products)

HTS Code	Representative Product	Category	Representative Uses
9603.29	Cosmetic brushes	Beauty Accessories	Foundation, blush, contour, powder, and facial application brushes
9603.30	Artists' and cosmetic application brushes	Beauty Accessories	Eye shadow, eyeliner, brow, concealer, and lip brushes
9616.20	Powder puffs and pads	Beauty Accessories	Powder application, foundation application, cosmetic blending
8214.20	Manicure and pedicure sets and instruments	Beauty Tools	Nail care kits, manicure sets, cosmetic grooming tools