



MEMORANDUM

To: Interested Parties
From: Consumer Brands Association
Re: Fine Tune the Approach — How to Enact a Truly America First Trade Policy
Date: July 2, 2025

You have probably heard the old saying that “90% of life is showing up.”

Well, for us, the makers of America's trusted household brands, showing up for the American people isn't just a saying — it's our ethos.

It's also how we do business.

But showing up is only half the equation. We also have to *deliver*; we deliver safe, affordable and convenient products that Americans love and trust.

We could bore you with the scale, scope and complexity of achieving that, but the bottom line is this: **90%** of the ingredients found in your everyday food, beverage, household and personal care products are sourced right here in America, from American farms and suppliers. The other 10%? Those are inputs that *fundamentally cannot be grown or made in the USA*, also known as **unavailable natural resources** (but more on that later).

In addition to unavailable ingredients, there are also challenges sourcing specific inputs where there are long-standing shortages in domestic production. **Tin mill steel** is the defining example — a ubiquitous, much-needed input to make food and aerosol cans, but not readily available from a single-remaining U.S. steel producer. American can manufacturers rely on foreign tin mill steel not because they want to, but because it's the only source that meets quality and quantity requirements.

The consumer packaged goods (CPG) industry is proud of its roots right here in the United States. We've always been America First and we are as committed as ever to continue making all we can right here in America to ensure quality, safety and on-shelf availability. To this end, our companies have made substantial investments in thousands of communities across our country.

That's why the CPG industry remains the #1 domestic manufacturing sector by workforce, supporting more than 22 million American jobs — 10.5% of the nation's total employment. And every year, we contribute more than \$2.5 trillion to the U.S. GDP.



As the Trump administration takes unprecedented steps to implement its America First trade policy and bring other domestic manufacturing sectors back to the United States, here are three important things to know:

1. **The policy shouldn't pick winners and losers.** Promoting one domestic sector shouldn't come at the expense of the domestic CPG sector and its workforce.
2. **Unavailable natural resources and tin mill steel matter.** There are things that fundamentally can't be grown or sourced here and there are important reasons why.
3. **Delivering wins.** The Trump administration can **fine-tune its America First policy** to incentivize and protect U.S. manufacturing, jobs and consumer prices.

Number 1: Picking Winners and Losers

A bedrock principle of American economic thought is not having the government pick winners and losers, especially when one side would be so hugely disadvantaged by a policy decision. Tariffs are intended to protect domestic manufacturers from unfair competition overseas and bad actors. However, tariffs can also have a negative ripple effect that could impact the competitiveness of U.S. manufacturers as it relates to cost, consumer prices and domestic jobs. It's not that all tariffs are bad — it's that we have to think through the consequences of the tariffs and weigh what is truly in the interest of U.S. manufacturers, consumers, national security and economic competitiveness.

The good news is that there's a way to preserve the intent of the Trump administration's efforts while considering balanced approaches that recognize nuance and unique circumstances facing domestic industries. In doing so, tariffs are more likely to yield the desired results while protecting other domestic manufacturers from unintended consequences.

Number 2: The other 10% — Unavailable Natural (and Not-Natural) Resources

Ninety percent of the ingredients found in your favorite food, beverage, household and personal care products are sourced from farms and suppliers here in America. The other 10% simply cannot be sourced in the United States for a variety of reasons, including geographic and climate conditions.

Examples include:

- **Cocoa:** Cocoa is not domestically available due to climatic limitations, yet cocoa products support over 70,000 American jobs because it can be easily imported from other nations.
- **Coffee:** Due to geographical and climatic limitations, domestic sourcing of coffee would be woefully insufficient. Without the ability to obtain coffee beans abroad, 165 million Americans would miss out on one of their favorite daily beverages (making for some very cranky mornings in America).



- **Spices:** Not much has changed since the days of the Silk Road and ancient civilizations — exotic spices and herbs like cardamom, black pepper and saffron still add flavor and personality to dishes. However, these ingredients continue to thrive in only a handful of regions due to their specific growing conditions. Some flavors, like Madagascar vanilla or Central American chiles, are deeply tied to their place of origin and often cannot be cultivated elsewhere in commercially viable quantities. Their unique environments contribute essential qualities that make them irreplaceable.
- **Shea or Palm Butters:** Personal care products using these ingredients would not exist without international cooperation, as the crops required to produce them cannot be grown in the United States.

Take **avocados** and **coconuts** — used in both their raw or derivative forms (coconut and avocado oil) for food and personal care products — while we are able to grow some here, there is not nearly enough U.S. production. We depend on other countries, like Mexico and the Philippines, to meet America’s voracious demand.

Origin-specific products are another example — things like Gruyere cheese; wine from a specific region; Vietnamese honey; and the list goes on. The unique climate, soil and overall *terroir* of a place matters and impacts the characteristics of these ingredients, making them difficult to produce in the United States.

This list is by no means exhaustive, leaving out tropical fruits, bamboo fibers and countless others.

While not a “natural” ingredient, it’s critical to recognize the importance of **tin mill steel**, which is used in a wide range of packaging for canned products — from canned vegetables, to shaving cream, to disinfectants and cleaners. The U.S. steel industry does not produce tin mill steel in the quality or quantities needed by U.S. can makers, leaving it only able to supply up to 30% of can makers’ demand. The current 50% tariff on steel could increase prices for consumers by as much as 15% and impact an estimated 20,000 good paying jobs. Food and can manufacturers would welcome the ability to source tin mill steel domestically, and we are urging the administration to provide incentives to make this resource available here in America.

Number 3: Fine-Tuning “America First” Trade Policy

Even as the fate of the administration’s reciprocal tariffs plays out in the courts, we know President Trump believes strongly in the potential benefit of tariffs. We are operating in a new era of trade and economic policy and it’s important that businesses and policy experts understand and adapt to these changes.

This is why the CPG industry calls attention to two primary issues in play right now — the issue of unavailable natural resources and critical inputs for which the domestic industry does not produce adequate quantities.



As previously addressed, U.S. can and food manufacturers would welcome the ability to purchase domestically produced tin mill steel that meets the industry's quality and quantity requirements. Rather than restrict and raise costs on tin mill steel imports — which are only needed due to the lack of domestic availability — the Trump administration could explore innovative industrial policies and facilitated partnerships between the steel industry and can makers to drive greater U.S. production.

Currently, there is only one domestic tin mill steel manufacturer: U.S. Steel. With the Trump administration's approval of the historic U.S. Steel and Nippon Steel transaction, there is an opportunity to potentially bring Nippon Steel's longstanding tin mill steel expertise from Japan to U.S. Steel's operations. This could potentially expand and modernize the domestic steel industry's ability to produce tin mill steel in the right quality and quantity to meet can makers' specification. Additionally, the administration could explore a package of incentives and commitments from can makers and the domestic steel industry to boost U.S. tin mill production and shift reliance away from imports. As the administration assists the domestic steel industry in making higher quality tin mill steel, it must also ensure that the supply remains consistently affordable and available. Historically, one of the challenges of tariffs on tin mill steel has been a hidden incentive for the domestic industry to raise its pricing floor to match the tariff level, eroding the desired effect of the tariffs.

This new model of incentives and accelerated investment facilitated by the Trump administration with U.S. steel makers, can makers and CPG companies would better protect domestic manufacturers that depend on a reliable and available tin mill steel supply chain. It would promote U.S. steel manufacturing and steel jobs, while avoiding some of the unintended consequences of tariffs on products that aren't available domestically.

By fine-tuning its tariff approach to recognize unavailable natural resources and facilitating an investment and incentive approach to boost greater American production of inputs like tin mill steel, the Trump administration could deliver on the ideological promise of an America First Trade Policy. These adjustments could provide real solutions that will protect thousands of U.S. manufacturing jobs, counter grocery inflation and preserve low prices.

Winning Together

Together, we can protect and grow U.S. manufacturing and strengthen America's workforce. We can build stronger, more resilient communities with deep ties to American agriculture and hands-on jobs. And we can do it while maintaining consumers' access to everyday essential products at an affordable price, with the broad range of choices they know and love.

As the administration continues to pursue the America First Trade Policy agenda, we encourage U.S. trade representatives to examine unavailable natural resources and incentivizing greater U.S. production of inputs like tin mill steel. Ensuring continued trade flows of those key inputs, which are not available from U.S. sources, is critical to achieving the president's economic vision, fighting grocery inflation and protecting the 22.3 million American jobs supported by food, beverage, household and personal care manufacturers.