



August 18, 2025

Submitted electronically via regulations.gov

Hon. Jamieson Greer  
United States Trade Representative  
600 17th St NW  
Washington, DC 20508

**Re: Docket No. USTR–2025–0043**

Dear Ambassador Greer:

The Consumer Brands Association (“Consumer Brands”) submits these comments in response to the request for public comments issued by the Office of the United States Trade Representative (“USTR”) regarding the Section 301 Investigation of Acts, Policies, and Practices of Brazil Related to Digital Trade and Electronic Services; Unfair, Preferential Tariffs; Anti-Corruption Enforcement; Intellectual Property Protection; Ethanol Market Access; and Illegal Deforestation.

Consumer Brands champions the U.S. manufacturing industry, whose products Americans depend on every day. Consumer Brands represents nearly 2,000 iconic brands that make up the U.S. consumer packaged goods (“CPG”) industry, from manufacturers of household and personal care to food and beverage products.

The CPG industry plays a vital role in powering the U.S. economy. It sustains 22 million American jobs, making it America’s largest manufacturing sector based on employment and contributes \$2.5 trillion to U.S. GDP annually. In some states, jobs in the CPG industry alone represent up to 20 percent of total employment in each state.

Consumer Brands appreciates President Trump’s leadership in combatting unfair trade practices and protecting U.S. manufacturers. USTR’s work thus far to advance a comprehensive and thoughtful America First Trade Policy is foundational to protecting U.S. manufacturers, including the iconic U.S. companies and brands that make the food, beverage, household, and personal care products used by Americans every day.

#### Importance of the U.S.-Brazil trading relationship

Consumer Brands’ member companies source roughly 90 percent of ingredients and inputs from domestic farms and suppliers. However, a small percentage of inputs must be sourced from other jurisdictions due to a range of factors, including climate, growing conditions, geography, unique long-standing processing infrastructure, and/or nonexistent or limited domestic availability.

Given its diverse growing conditions and unique climatic zones in different geographies, Brazil serves as a critical trading partner for a country-specific subset of these unavailable natural resources. Brazilian unavailable natural resources are critical to the U.S. domestic production of certain food, beverage, household, and personal care products. Recognizing that the U.S. CPG industry makes every effort to source domestically from U.S. farms and suppliers, we support the Trump Administration's thoughtful consideration of ways to account for the potential lack of availability and substitutability of certain Brazilian inputs over the course of this investigation.

### Recognizing unavailable natural resources

In drafting its executive order and subsequent guidance, the Trump Administration should be commended for already taking pains to recognize some of these key unavailable natural resources, differentiating ingredients and inputs that U.S. manufacturers have no choice but to source from Brazil. Ongoing efforts to fine-tune the administration's America First approach and avoid unintended consequences are critical to preventing critical supply chain disruptions that would otherwise threaten the affordability, accessibility, and availability of everyday essential products.

As the Trump Administration continues its investigation into Brazil's unfair and discriminatory trade practices, we suggest that USTR preserve and continue its work to recognize unavailable and irreplaceable natural resources from the start. Building on this foundation will allow for targeted and effective deployment of tariff and non-tariff policy actions aimed at correcting unfair and discriminatory actions without adverse consequences on U.S. manufacturers and consumers. USTR should also extend this model to other future deals and efforts underway with countries around the world. Thoughtful upfront analysis of supply chain dependencies is a clear best practice and precedent that proactively advances U.S. interests in keeping with the aims of America First policy.

Consumer Brands recognizes the efforts taken thus far by the Administration to account for many of these critical inputs from Brazil and hopes for continued consideration as trade agreements are developed.

### Conclusion

The Trump Administration's America First trade policy promises to massively benefit the American manufacturers that Consumer Brands represents. Our organization understands and appreciates the importance of protecting U.S. manufacturers from unfair trading practices.

But it is critical for the Trump Administration to consider the realities and needs of the industries that are materially impacted when implementing these trade policies, particularly U.S. manufacturing sectors. As America's largest manufacturing sector by employment, the CPG industry exemplifies the importance of smart sourcing to protect U.S. workers, consumers, and

national security. Our relationship with Brazil is mutually-beneficial in the context of many of these inputs—American industries are supported by inputs that domestic sources cannot adequately supply. Trade barriers on these products would only hurt U.S. manufacturers.

Consumer Brands appreciates the opportunity to submit comments and welcomes any opportunity to remain involved in conversations with the Administration on the development of U.S. trade strategies moving forward.

Sincerely,

A handwritten signature in black ink, appearing to read 'Tom Madrecki', with a stylized, cursive flourish at the end.

Tom Madrecki

Vice President, Campaign & Special Projects

Consumer Brands Associations

[tmadrecki@consumerbrandsassociation.org](mailto:tmadrecki@consumerbrandsassociation.org)