

March 16, 2018

President Donald J. Trump
1600 Pennsylvania Avenue NW
Washington, DC 20500

Re: Proposed Tariff on Aluminum and Steel

Dear Mr. President,

On behalf of the Household & Commercial Products Association¹ (HCPA) and its members, I write to express our industry's grave concerns with the recent imposition of tariffs on aluminum and steel imports under section 232 of the Trade Expansion Act of 1962 (published at 83 Fed. Reg. 11,619 and 83 Fed. Reg. 11,625, respectively).

HCPA members make and sell \$180 billion annually of products used for cleaning, protecting, maintaining, and disinfecting homes and commercial environments. HCPA member companies employ 200,000 people in the U.S. whose work helps consumers and workers create cleaner, healthier and more productive lives. HCPA represents a wide range of products, from household cleaners and air fresheners to commercial disinfectants and pest control. Many of these products use aerosol technology, making the aerosol industry an integral part of the household and commercial products industry.

Aerosol manufacturing is an American stalwart, with more than 90 percent² being manufactured by and sold to American companies. Nearly all of these products use either aluminum or steel. HCPA analysis reports that in 2016, United States manufacturers produced 3.02 billion steel containers, 811 million aluminum containers and 3.72 billion valves to fill 3.75 billion aerosol products³. The aerosol industry clearly relies on high-quality imported steel and aluminum to produce the containers and valves essential to the safety and performance of the finished aerosol products.

¹ The Household & Commercial Products Association (HCPA) is the premier trade association representing companies that make and sell \$180 billion annually of products used for cleaning, protecting, maintaining, and disinfecting homes and commercial environments. Formerly known as the Consumer Specialty Products Association (CSPA), HCPA member companies employ 200,000 people in the U.S. whose products help consumers and workers to create cleaner, healthier and more productive lives.

² Based upon 2001-2016 Consumer Specialty Products Association (CSPA) Aerosol Pressurized Products Survey.

³ 2016 Consumer Specialty Products Association (CSPA) Aerosol Pressurized Products Survey, May 2017.

Tariffs on aluminum and steel will artificially raise the cost of aerosol packaging, and thus the cost of aerosol consumer products. Any disruption in the market will significantly increase costs to consumer product manufacturers as aluminum and steel customers. This action will also decrease access to the best quality materials, slow innovation and negatively impact Aerosol can and component manufacturers, and the household and commercial products industry that supports 200,000 jobs.

Imported aluminum used to make aerosol packaging and consumer products is clearly not a threat to national security, therefore, we respectfully urge the Administration to reconsider these tariffs that will unnecessarily increase costs to American aerosol and consumer product manufacturers.

We thank you for your time and attention to this critical issue. If you or your staff require any additional information on our industry, or our members' products and business concerns, please do not hesitate to contact me directly. We look forward to working with your administration to mitigate the negative impacts these tariffs will have on our members and the U.S. economy.

Sincerely,



Stephen J. Caldeira