

May 7, 2025

Stephen Astle
Director, Defense Industrial Base Division
Office of Strategic Industries and Economic Security
U.S. Department of Commerce
1401 Constitution Ave, NW
Washington, DC 20230

RE: Notice of Request for Public Comments on Section 232 National Security Investigation of Imports of Pharmaceuticals and Pharmaceutical Ingredients (XRIN 0694-XC120), April 14, 2025

Dear Director Astle:

On behalf of our more than 460 member hospitals and health systems, including rural, urban, children's, teaching and specialty hospitals, the Texas Hospital Association (THA) appreciates the opportunity to comment on the Department of Commerce's request for public comment on its Section 232 national security investigation on pharmaceutical and pharmaceutical ingredient imports.

Given recent shortages brought about by pandemic-era supply chain disruptions and natural disasters, THA knows well the dangers of relying on a limited number of manufacturers to provide drugs and supplies that keep Americans healthy. Along these lines, THA believes greater competition in the pharmaceutical market ensures fairer pricing and wider patient access. Finally, THA acknowledges the need to maintain the highest levels of quality and safety in all pharmaceuticals and precursors.

With these goals in mind, THA supports administrative efforts to grow domestic production capacity and reduce reliance on imported pharmaceuticals. However, we are concerned with the impact that tariffs or other import restrictions could have on Americans' health and pocketbooks. As such, THA joins the American Hospital Association in urging the administration to maintain tariff exceptions on these products while working to promote increased domestic production.

We thank the administration for its efforts to protect this country, both its citizenry and its economy, and are grateful for the opportunity to provide feedback on this important topic. THA welcomes additional dialogue with the administration on securing the highest quality health care for Americans at a reasonable cost. Please contact us if we can provide additional information or otherwise be of assistance.

Sincerely,

Matt Turner, PhD, MPH
Senior Director
Health Care Policy