

May 7, 2025

Eric Longnecker  
Deputy Assistant Secretary for Technology Security  
Bureau of Industry and Security, U.S. Department of Commerce  
1401 Constitution Ave NW  
Washington, DC 20230

Stephen Astle  
Division Director, Defense Industrial Base  
Bureau of Industry and Security, U.S. Department of Commerce  
1401 Constitution Ave NW  
Washington, DC 20230

RE: Public Comments on Section 232 National Security Investigation of Imports of Pharmaceuticals and Pharmaceutical Ingredients (Docket No. 250414-0065)

Dear Deputy Assistant Secretary Longnecker and Director Astle:

The undersigned organizations respectfully urge the Bureau of Industry and Security to protect patient access to medications by opposing the imposition of tariffs on pharmaceutical products and the chemical components used in their manufacturing. While we support efforts to strengthen domestic production and secure critical supply chains, those objectives must not compromise patient access to medications.

Imposing tariffs on pharmaceutical imports could increase the cost of medicines and ingredients, with those costs likely being passed on to patients—many of whom already face high out-of-pocket expenses. In addition, supply disruptions caused by trade restrictions could hinder timely access to treatment, particularly for patients who rely on medicines produced abroad.

Patients are not ordinary consumers; they do not select the medications they are prescribed and cannot select alternatives based solely on where an item was manufactured. Individuals living with chronic, rare, or complex conditions often have limited options, as only certain treatments work for their specific medical needs. Hindering access to treatment options due to higher costs or reduced availability can have devastating health consequences. Patients deserve policies that protect—not endanger—their ability to access the full range of treatments prescribed by their doctors.

We applaud the administration's commitment to growing the domestic pharmaceutical sector. However, it is essential that this vision be paired with protections that maintain the affordability and accessibility of medications for patients. Tariffs on pharmaceutical products and chemical ingredients would undermine those goals and could jeopardize the well-being of millions.

These concerns are not new, nor is the understanding that medications and the patients that rely on them deserve unique safeguards. These special circumstances have long been recognized and addressed through multilateral action. The United States has been a party to the WTO Pharmaceutical Tariff Elimination Agreement since 1995, alongside key global allies including the European Union, Canada, Japan, and others. This agreement eliminated tariffs on hundreds of pharmaceutical products and chemical intermediates to ensure access to life-saving medications was not impeded by trade barriers.

The agreement remains a critical safeguard for patients and a model for responsible global trade in essential goods.

We respectfully urge the administration to reaffirm the United States' commitment to tariff-free trade in pharmaceuticals and their inputs, and to preserve the systems that protect patients' access to the medications they depend on for their health and quality of life.

Sincerely,

Chronic Care Policy Alliance (CCPA)

AiArthritis

Alliance for Patient Access

American Behcet's Disease Association

Applied Pharmacy Solutions

APS Foundation of America

Arizona Chronic Care Together (ACT)

Born a Hero Research Foundation

California Rheumatology Alliance

Caring Ambassadors Program

Coalition of Wisconsin Aging and Health Groups

CURED Nfp (Campaign Urging Research for Eosinophilic Diseases)

Gaucher Community Alliance

Greater Chicagoland Black Chamber of Commerce

Global Allergy & Airways Patient Platform

Global Blood Therapeutics

Hereditary Neuropathy Foundation

HIV+Hepatitis Policy Institute

International Association of Hepatitis Task Forces

Latin Chamber of Commerce

National Adrenal Diseases Foundation

National Association of Nutrition and Aging Services Programs

National Scleroderma Foundation

Neuropathy Action Foundation

Nevada Chronic Care Collaborative

Nevada Pharmacy Alliance

NW Rare Disease Coalition

Ohio Life Sciences Association

Oncology Nurses Society (ONS)

Phaware Global Association

Psychiatric Physicians Alliance of California

Sickle Cell Disease Foundation

Sjogren's Foundation