

James L. Martin Founder/Chairman

Saul Anuzis
President

**Pat Boone** National Spokesman

May 5, 2025

Eric Longnecker
Director, Defense Industrial Base
Bureau of Industry and Security
U.S. Department of Commerce
1401 Constitution Ave. NW
Washington, D.C. 20230

Stephen Astle
Deputy Assistant Secretary for Technology Security
Bureau of Industry and Security
U.S. Department of Commerce
1401 Constitution Avenue NW
Washington, D.C. 20230

Subject: Docket No. 250414-0065: Request for Public Comments on Section 232 National Security Investigation of Imports of Pharmaceuticals and Pharmaceutical Ingredients

Dear Deputy Assistant Secretary Longnecker and Director Astle,

I am writing regarding the Trump administration's planned <u>tariffs</u> on pharmaceuticals and their ingredients. While I support the president's commitment to strengthening our national security, I believe that tariffs on medicines imported from American allies are unnecessary and will only harm Americans' health.

As the leader of The 60 Plus Association, the nation's leading conservative advocacy group for seniors, I am particularly concerned that tariffs on imported pharmaceuticals would lead to higher costs and lifethreatening drug shortages for older Americans.

Many of the most sophisticated and effective therapies for chronic diseases like cancer are either manufactured in <a href="Europe"><u>Europe</u></a> or manufactured here with ingredients sourced from the continent. If tariffs are implemented on these products, prices will rise—and Americans could lose access to the drugs they need.

In the past, the United States—along with trading partners such as the European Union and Japan—has <a href="mailto:exempted">exempted</a> pharmaceuticals from tariffs for precisely this reason. Patients don't choose their diseases, and they have no say over which medicines their doctors prescribe.

60 Plus Association
American Association of Senior Citizens
2121 Eisenhower Avenue • Suite 229 • Alexandria, VA 22314

If the active ingredient in a patient's cancer medicine is made exclusively in France or Switzerland, for instance, tariffs could easily lead to a shortage of that therapy. At the very least, such a policy would send the price of affected medicines soaring, restricting access across the country and placing new financial burdens on American patients, including seniors.

As the <u>largest public payer</u> for prescription drugs, Medicare's costs would also increase significantly if tariffs cause drug prices to rise. That outcome would directly undermine President Trump's goal of reducing unnecessary government spending.

To be clear, tariffs have their place. America should not need to rely on China for generic medicines and ingredients, and tariffs can incentivize companies to break that dangerous dependence and relocate their supply chains out of our greatest adversary.

But the situation is different for more advanced pharmaceutical ingredients sourced from Europe. America is not equipped to immediately begin manufacturing many of the complex ingredients currently supplied by European companies. It would likely take years to establish this manufacturing infrastructure at the necessary scale.

Building that manufacturing capacity at home is certainly a worthy long-term aim, and many companies are already investing heavily in domestic manufacturing. Roche, the Swiss drug giant, just announced a \$50 billion investment in American manufacturing.

But tariffing our allies, and disrupting integrated supply chains on both sides of the Atlantic, would make it harder—not easier—to expand domestic production. It'd hurt patients and American workers without delivering any national security benefits.

For those reasons, I respectfully advise the administration not to impose tariffs on European-made pharmaceuticals.

Sincerely,

James Martin
Founder & Chairman

Saul Anuzis
President