

May 6, 2025

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

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

RE: Request for Public Comments on Section 232 Investigation of Pharmaceutical Imports

Dear Deputy Assistant Secretary Longnecker:

Thank you for the opportunity to provide comments on the Department of Commerce's Section 232 investigation into the national security implications of pharmaceutical imports.

I write in my capacity as a long-time advocate for older Americans. For the past 25 years, I have worked to advance the interests of seniors, first as the Chief Executive Officer of the Seniors Coalition, and then as the President and CEO of RetireSafe. I am now the spokesperson of Seniors Speak Out, a project of the Healthcare Leadership Council. In these roles, I have heard from thousands of older Americans who rely on consistent access to affordable prescription medicines to manage chronic conditions, maintain their independence, and live with dignity.

I support the administration's desire to strengthen America's pharmaceutical supply chain and enhance national security. The Section 232 investigation provides an important opportunity to do just that, but only if it is narrowly tailored to address real threats. Targeting essential medicines manufactured in adversary countries may be justified on national security grounds. However, imposing tariffs on complex, innovative medicines produced in allied nations like those in Europe or Japan does not advance that goal. It risks harming patients while doing nothing to strengthen American security.

Not all industries respond to tariffs in the same way. If the government raises tariffs on foreign-made cars, American consumers can likely switch to U.S.-made alternatives. This might be

inconvenient, but it isn't life-threatening. Similarly, if someone has to swap Canadian lumber for American or pick a bottle of Napa Valley wine instead of one from Burgundy, it may be an annoyance, but their health won't suffer.

But medicines, especially highly complex therapies for cancer and other conditions, don't work that way. No one chooses what disease they're diagnosed with, let alone where the best treatment for that disease is made. If my doctor prescribes a brand-name cancer drug from an overseas firm like Novo Nordisk, GSK, or Sanofi, and that drug is hit with tariffs, I can't just "switch" to a U.S.-made alternative. In many cases, no such alternative exists. More likely, I'd be forced to buy the same foreign-made drug, just at a much higher price.

This is particularly troubling for older Americans. Many seniors live on fixed incomes and already face high out-of-pocket costs for their prescriptions. I have met too many who are forced to make painful choices, cutting pills in half, skipping doses, or abandoning treatment altogether, because they cannot afford the medications they need. In fact, nearly [one in four](#) seniors report difficulty affording their prescriptions, according to recent national surveys. Increasing prices through trade policy would only deepen this crisis.

Cutting-edge cancer or immunological treatments aren't simple. Many are manufactured domestically, [often relying on specialized ingredients sourced from allies](#), or are manufactured in [state-of-the-art facilities in Europe](#). Relocating production of these advanced drugs and chemical components takes many years given their complexity and the need to meet strict safety requirements. In the meantime, tariffs would just raise prices, making it harder for seniors to afford the medicines they need.

Under Section 232 of the Trade Expansion Act, the president has authority to act when certain imports threaten national security. But cancer drugs from Europe and Japan don't pose that kind of threat. The investigation should focus on real risks, like overreliance on essential medicines and ingredients from adversarial nations.

I urge the administration to avoid broad tariffs on imported medicines and instead focus Section 232 actions on legitimate and evidence-backed security concerns. Medicines from trusted allies should not be caught in the crossfire. President Trump has shown he's willing to reconsider

policies when presented with valid concerns, and this is one of those moments. Surely the president doesn't want seniors to become collateral damage in a trade war. I respectfully urge the Department to ensure that any recommendations resulting from this investigation protect American patients, especially our seniors, by maintaining access to safe, effective, and affordable treatments.

Thank you for your time and consideration.

A handwritten signature in cursive script, reading "Thair Phillips". The ink is dark and the signature is fluid.

Sincerely,

Thair Phillips

Seniors Speak Out

SeniorsSpeakOut.org