National Association of Nutrition and Aging Services Programs



1612 K Street, NW Suite 200 Washington, DC 20006 (202) 682-6899 (202) 223-2099 fax www.nanasp.org

May 6, 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

Request for 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:

I'm writing to express concerns over the impending Section 232 <u>tariffs</u> on pharmaceutical imports. I recognize the national security imperative of reducing our reliance on geopolitical foes. As Executive Director of the National Association of Nutrition and Aging Services Programs, I work to ensure that public policies improve seniors' health and quality of life. Given that nearly <u>nine in ten</u> older adults depend on at least one prescription medicine, any policy—such as widespread tariffs—that makes these critical treatments unaffordable or causes shortages would pose a dire threat to seniors' health.

I'm certain if the Department of Commerce follows the facts, it will conclude that there is no national security benefit in tariffing medicines and ingredients from allies like Europe and Japan. Such tariffs would only reduce vulnerable U.S. seniors' access to medicines that are sourced from trusted partners abroad. Imposing tariffs on these imports would unnecessarily drive-up prices and restrict access to life-saving medications.

Many of the world's most advanced therapies for diseases like Parkinson's, cancer, and diabetes either <u>originate</u> in Europe or <u>rely</u> on ingredients sourced from the continent. Similarly, Japanese companies both perform <u>cutting-edge</u> drug research and manufacture

many state-of-the-art medicines that benefit American seniors. Imposing tariffs or disrupting any of these international supply chains would create devastating, potentially fatal consequences for older patients.

Historically, the United States has <u>exempted</u> pharmaceuticals from tariffs in recognition of their essential role in public health. Unlike selecting a different car brand, patients don't have a choice of which drugs their doctors prescribe. Medicines and their active ingredients often can't be substituted. For instance, <u>33%</u> of the active ingredients used in the drugs Americans consume come from Europe. Building domestic manufacturing capacity to replace these suppliers would take years—and patients don't have years to wait.

Rather than strengthening supply chain resilience, imposing tariffs on trusted allies would increase costs and logistical hurdles for American manufacturers and create new vulnerabilities for American patients. Protecting the health and economic security of our seniors—and all Americans—must be a guiding principle in decisions that affect access to medicines.

For these reasons, I encourage the Department of Commerce to conclude the Section 232 investigation without imposing tariffs on pharmaceutical goods from our allies.

Sincerely,

Bob Blancato

Executive Director

polo R. Manco

National Association of Nutrition and Aging Services Programs