## Comment on XRIN 0694-XC120 – Section 232 National Security Investigation of Imports of Pharmaceuticals

## On behalf of the Hashemite Kingdom of Jordan

The U.S.–Jordan Free Trade Agreement (FTA) has served as a cornerstone of bilateral economic cooperation since its entry into force in 2001. It has encouraged substantial Jordanian investment in the United States. A key example is Hikma Pharmaceuticals, which operates four manufacturing facilities in Ohio and New Jersey, employs over 2,400 people, and exports approximately \$2 billion USD annually from the United States.

Notably, Hikma's wholly owned U.S. subsidiary, Westward Pharmaceuticals, maintained a five-year contract (2003–2007) with the U.S. Department of Veterans Affairs (VA) to supply "Lisinopril," a product manufactured in the United States using packaging materials sourced from Jordan. This is one example of the strong and mutually beneficial integration of U.S.–Jordan supply chains in the pharmaceutical sector.

## **Regarding Section 232 National Security Measures:**

Jordan appreciates the United States' efforts to safeguard its national security and maintain resilient supply chains. However, it is important to highlight that Jordanian exports represent a negligible share of total U.S. imports in sectors currently or potentially subject to Section 232 measures.

For example, Jordan's share of U.S. pharmaceutical imports is approximately **0.057%** of total U.S. pharmaceutical imports.

In light of this, and in the spirit of preserving the economic and strategic partnership under the U.S.-Jordan FTA, Jordan proposes that a minimum import threshold be established, below which current or future Section 232 measures would not apply.

Specifically, Jordan proposes a threshold of 1.5% of total U.S. imports within a given sector. With this proposal, Jordanian exports would only be subject to Section 232 measures if they exceed this threshold. This proposal acknowledges the intent of Section 232 while ensuring that measures are not unnecessarily applied to long-standing partners, such as Jordan, whose export volumes pose no national security risk, nor any risk to American manufacturing and industry, and contribute positively to the U.S. economy.

We appreciate your consideration of this proposal and stand ready to provide any further information that may be helpful to your deliberations.