



**Comments by the
National Milk Producers Federation
Request for Information on Section 232 National Security Investigation of Imports of
Pharmaceuticals and Pharmaceutical Ingredients
Docket Number BIS-2025-0022**

May 6, 2025

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

Dear Director Astle,

The National Milk Producers Federation (NMPF) appreciates the opportunity to submit the following comments in response to the Request for Information on the Bureau of Industry and Security's Section 232 National Security Investigation of Imports of Pharmaceuticals and Pharmaceutical Ingredients.

NMPF develops and carries out policies that advance the wellbeing of dairy producers and the cooperatives they own. The members of NMPF's cooperatives produce the majority of the U.S. milk supply, making NMPF the voice of dairy producers on Capitol Hill and with government agencies. NMPF provides a forum through which dairy farmers and their cooperatives formulate policy on national issues that affect milk production and marketing. NMPF's contribution to this policy is aimed at improving the economic interests of dairy farmers, thus assuring the nation's consumers an adequate supply of pure, wholesome, and nutritious milk and dairy products.

First, we would like to express our support for the Trump administration's goal of addressing unfair trade and regulatory policies with trading partners throughout the world. Fortunately, in the case of animal health pharmaceuticals, these products enjoy zero tariffs on exports to our major trading partners. The imported animal health pharmaceuticals do play a key complementary role to domestically produced products, however.

Economic and Security Risks

U.S. farmers rely heavily on veterinary tools and inputs from abroad to keep their animals healthy, and consequently the U.S. food supply safe. Weakening or disrupting access to these tools would not only cause economic pain for farmers faced with costlier and more limited options to keep their animals healthy but would also represent a threat to national security given its risk to U.S. food production. Animal disease outbreaks present a systemic risk to U.S. food systems and rural economies, where even a single animal health event could carry significant human and economic costs. Jeopardizing veterinary and animal health supplies through by imposing tariffs on imports of

these products risks weakening national security and economic growth, rather than strengthening it.

Impacted Animal Health Supply Chain Experiences

Although America's animal health supply chains demonstrated greater resilience than many other sectors during the pandemic, U.S. dairy farmers still faced challenges accessing key antimicrobials and other animal health interventions used to manage disease like mastitis—one of the most common and costly dairy cattle diseases. Shortages of essential treatments for even mild infections underscored the ongoing need to strengthen supply chain reliability for animal health products.

Recommendations

We appreciate President Trump's emphasis on the need for strong supply chains and share the administration's goals of achieving that through the construction of more manufacturing sites in the United States. While tariffs are a short-term strategy, we recommend two actions to help accomplish long-term and sustainable success:

1. Use specific Harmonized Tariff System codes (8 or 10 digit) to exempt animal health products, including drugs, vaccines and diagnostics, from any pharmaceutical tariffs that might be imposed.
2. Ensure that the Food and Drug Administration and the USDA's Center for Veterinary Biologics work with the animal health industry to modernize and streamline the regulatory review processes necessary for manufacturing changes for animal health products.

Conclusion

Sick animals benefit no one. Keeping livestock healthy is vital to sustaining U.S. agriculture export markets and supporting rural American communities, but also to keeping our food supply safe for everyone. Given those ramifications and the unique economic environment of the animal health industry, it is especially critical to avoid unnecessary and risky supply disruptions and improve the domestic regulatory environment.

We appreciate the opportunity to provide comments on this important issue, and we remain available to provide any further clarification as needed. Should you have any questions, please feel free to contact Shawna Morris, whose contact information is provided below.

Point of Contact:

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