

May 7, 2025

Department of Commerce
Bureau of Industry and Security
1401 Constitution Ave NW,
Washington, DC 20230

Subject: Comments on Section 232 National Security Investigation of Imports of Pharmaceuticals and Pharmaceutical Ingredients

Dear Sir/Madam,

I am writing on behalf of Revvity, Inc. to submit comments regarding the Section 232 National Security Investigation of Imports of Pharmaceuticals and Pharmaceutical Ingredients, published on April 16, 2025, in the federal register (the "Investigation"). We are concerned that immunoassays we manufacture in Finland and France will be subject to incremental tariffs imposed upon imported pharmaceuticals and pharmaceutical ingredients despite being products that are for research use only ("RUO"). As RUO products, these offerings are not pharmaceuticals or pharmaceutical ingredients but are antibody reagents used in scientific research and medical diagnostics assigned harmonized tariff classification numbers 3002.12.0010, 3002.12.0090, 3002.14.0010, 3002.14.0090, 3002.15.0011 and 3002.15.0091. We do not believe that the intent of the Investigation is to target products such as the ones we make and request your consideration of an appropriate narrowing of products subject to incremental tariffs as a result of the findings from the Investigation.

The imposition of tariffs on these RUO products could have significant adverse effects on our ability to supply these solutions that drive important research in the life sciences space. Specifically, tariffs on these RUOs would raise the cost of imported products, leading to higher prices for our U.S. based customers and potentially limiting access to these products if price increases become unsustainable and result in discontinuation of products to the American market. Further, it would take many years for Revvity to stand-up manufacturing and produce these RUO products in the United States which in any event, might not be possible given the relatively small overall market size for these products.

We urge the Bureau of Industry and Security to carefully consider these potential impacts and explore alternative measures or exclusions for RUO products such as Revvity's which seem to fall outside of the intent of the Investigation.

Thank you for considering our comments. We look forward to participating in further discussions on this important issue.

Sincerely,
Jacqueline Lesowitz
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