World Patients Alliance

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

CC:

Stephen Astle
Director of Defense Industrial Base Division
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U.S. Department of Commerce
1401 Constitution Avenue NW
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Regarding Request for Public Comments on Section 232 National Security Investigation of Imports of Pharmaceuticals and Pharmaceutical Ingredients

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 serve as Board Chair of the World Patients Alliance, which advocates for access to affordable, high-quality health care for all patients. While I appreciate the administration's intention to bolster U.S. national security, I am concerned that broad tariffs on imported pharmaceutical products would not achieve this goal. They would only harm American patients and disrupt a key part of our economy.

Medicines are not typical consumer goods. They are complex, highly regulated products that usually cannot be substituted or delayed. If a patient is prescribed a particular cancer therapy, she can't simply switch to a different prescription that relies on fewer imported components, the way consumers in other sectors might be able to prioritize domestically manufactured goods.

Moreover, while it is true that over half of the pharmaceutical ingredients used in Americans' medicines are produced domestically, foreign producers and facilities play an integral role in pharmaceutical supply chains. Europe supplies roughly a third of the ingredients in U.S.-made medicines. And many cutting-edge treatments—such as CAR-T cell therapies and targeted immunotherapies—depend on complex, globally integrated manufacturing processes.

Because of the complexity and interconnectedness of these supply chains, imposing tariffs on imported pharmaceutical products from Europe and Japan would immediately increase production costs and disrupt

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Americans' access to lifesaving drugs. These real repercussions would be felt long before any potential benefits to America's domestic industry.
The risks are especially significant given the remarkable progress we have made in recent years in the fight against cancer. Since 1991, the U.S. cancer death rate has fallen by 33%, saving nearly 4 million lives. This success is due in large part to better medicines. In 2023 alone, companies initiated over 2,000 new clinical trials for novel cancer medicines and treatment modalities.

With more than two million new cancer cases anticipated in the United States this year—a historic high—now is the worst possible moment to undermine progress. Yet by disrupting supply chains and imposing new costs on drug developers, that's exactly what pharmaceutical tariffs risk doing. Tariffs would shrink R&D budgets, delay drug approvals, slow clinical trials, and prevent patients from accessing innovative therapies.

Finally, U.S. leadership in biotechnology is also at stake. Nearly 360,000 Americans work at almost 1,600 biopharmaceutical manufacturing plants nationwide. But the success of those facilities depends on the reliability of the global supply chain that provides them with materials. Tariffs on essential pharmaceutical components would destabilize this thriving domestic industry, hurting businesses and creating uncertainty that could limit future investment and job growth in this sector.

Imported medicines and their ingredients—particularly those that come from Europe, Japan, and other allies—are not a national security threat. On the contrary, these imports bring irreplaceable benefits to Americans by keeping our citizens healthy and our economy strong.

I respectfully urge the Department of Commerce to preserve the longstanding U.S. policy of exempting pharmaceuticals from tariffs. Strong medicine supply chains and reliable access to medicines both serve U.S. security. Tariffs that increase costs and reduce access to vital medications would only undermine it.

Thank you for your consideration.

Sincerely,

Andrew Spiegel
Board Chair, World Patients Alliance