



Arkema Comments

U.S. Department of Commerce  
Bureau of Industry and Security  
Section 232 National Security Investigation of Imports of Pharmaceuticals and  
Pharmaceutical Ingredients

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Arkema Inc., part of the global Arkema Group (Arkema), is a specialty materials manufacturer that designs and produces a unique set of chemistries that help our customers meet the demand for innovative and high performing materials that are needed across many vital sectors. In the U.S., Arkema operates 49 facilities in 24 states, including Pennsylvania where our North American headquarters is located. Arkema provides over 4,000 jobs in the U.S., and we are proud to help support the local communities in which we operate, as well as our range of customers that span many key markets. We stand ready to do our part to help ensure there is a strong and robust domestic manufacturing capability for the U.S. and the world. In order to assist the U.S. Department of Commerce and the Trump Administration with this objective, we are providing the information below regarding specific materials and/or products that are essential to Arkema's U.S. business operations.

This document contains **Business Confidential** information. Business confidential information is noted by yellow highlighting and brackets. Disclosure of the highlighted and bracketed information would endanger Arkema's trade secrets, profitability or competitiveness and such information would not customarily be released to the public. The redactions are exempt from the Freedom of Information Act (FOIA) per FOIA Exemption 4: confidential trade secrets and commercial or financial information. The redacted information is confidential and contains trade secrets, commercial, and/or financial information that is customarily treated by Arkema as confidential or private information. Such confidential information includes, but is not limited to: product names, markets, trade information, investments, production, manufacturing locations, technologies, and/ other competitive sensitive information etc. This confidential information is being provided to the Department of Commerce with the expectation and assurances that this information will be treated and held as confidential information, and we greatly appreciate your efforts in this regard.

## Public (Non-Confidential)

Arkema [\*\*\*] on the following products that support the pharmaceutical/medical industry directly or indirectly. These products are manufactured at our facilities in the U.S. and many of them [\*\*\*], including the following:

- [\*\*\*]
  - This product is manufactured in [\*\*\*] and is used to produce piping, flexible tubing, fittings, valves, pumps, and tank linings used in pharmaceutical manufacturing. Arkema [\*\*\*.]
- [\*\*\*]
  - This product has potential indirect use in the pharmaceutical industry in [\*\*\*] that could be used in some of the manufacturing processes. This product is made at [\*\*\*] facility.
- [\*\*\*]
  - These products are manufactured by Arkema in [\*\*\*], and they face significant competitive pressures from [\*\*\*] overcapacity.
- [\*\*\*]
  - This product is the raw material for the production of [\*\*\*] and is manufactured by Arkema in [\*\*\*]. This product faces significant competitive pressures from foreign overcapacity and other imports.
- [\*\*\*]
  - Arkema's [\*\*\*] is made domestically in [\*\*\*] and competitive [\*\*\*] comes from either [\*\*\*].
  - [\*\*\*] can replace [\*\*\*] for applications below, in addition to coating of metal surfaces (vessels, connectors, pumps, etc).
- [\*\*\*]
  - This product is produced by Arkema at its [\*\*\*] facility and it faces unfair competition from [\*\*\*] as those countries can source a key precursor material [\*\*\*] from [\*\*\*] that significantly reduces production costs.
- [\*\*\*]
  - These finished goods are produced at Arkema's [\*\*\*] facility and they are [\*\*\*] used in life saving angioplasty catheters. Arkema's [\*\*\*] are used in most of the [\*\*\*] in North America, and globally. Those [\*\*\*] also support medical device manufacturers in applications such as other medical tubing, other catheters, syringes, respiratory devices etc. [\*\*\*].
- [\*\*\*]
  - Arkema's [\*\*\*] is made in [\*\*\*] and can [\*\*\*] in these applications. There is some domestic production of [\*\*\*], but a large portion of the usage comes from [\*\*\*] imports.
  - Drug Delivery Devices: [\*\*\*] is used in various parts of drug delivery systems, including needles, syringes, and reservoirs.
  - Manufacturing Equipment: [\*\*\*] is used in components of manufacturing equipment.

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Arkema [\*\*\*] on the following product.

- [\*\*\*]
  - This product is produced by [\*\*\*], and it is used by the pharmaceutical/medical sectors) for use as a [\*\*\*]. In pharmaceutical manufacturing it also can be used to [\*\*\*] equipment and workspaces. It is also used as an [\*\*\*] in manufacturing processes. In combination with other chemicals it is also used for cost-effective [\*\*\*] manufacturing process. [\*\*\*] is also used in numerous other [\*\*\*].

Arkema's manufacturing operations in the U.S. [\*\*\*]. Tariffs on these raw materials [\*\*\*].

Arkema [\*\*\*] on the following products which are key raw materials or inputs for production that have [\*\*\*] source – the raw materials are used to manufacture products at [\*\*\*] and these products below are used directly or indirectly by the pharmaceutical industry either as inputs to products they manufacture or as key inputs to materials that are used to support manufacturing processes. [\*\*\*].

Tariffs that are marked with an asterisk (\*) indicate HTS codes that are listed on Annex II.

- [\*\*\*]
  - This product is used to produce [\*\*\*] facility and is in turn sold to a variety of different customers, mainly for use as an [\*\*\*] that can be used to support the pharmaceutical manufacturing and supply chain processes. This product does not have a US supplier and the only supplies available are via imports.
- [\*\*\*]
  - This product is also used at [\*\*\*] manufacturing location and supports downstream customer medical countermeasures applications such as catheters, syringes etc.
- [\*\*\*]
  - This product is used at [\*\*\*] manufacturing location and is the key raw material for the production of [\*\*\*] that are used in most of the [\*\*\*] in North America, and globally. Those [\*\*\*] also support medical device manufacturers in applications such as other medical tubing, other catheters, syringes, respiratory devices etc.
- [\*\*\*]
  - [\*\*\*]. This material is used by [\*\*\*]
  - This product as a raw material in the production of commercial roof coatings, but it is also used in are used as UV filters in sunscreens and personal care products. In addition, [\*\*\*] is used as a synthetic intermediate in the manufacture of pharmaceuticals, agricultural chemicals, and other

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industrial products. This raw material does not have a U.S. supplier and the only supplies available are via imports from [ \* \* \* ]. [ \* \* \* ].

- [ \* \* \* ]
  - This product is a raw material in sealants and adhesives, but it is also a key component in producing [ \* \* \* ] like wound dressings, contact lenses, and drug delivery systems. [ \* \* \* ].
- [ \* \* \* ]
  - This product is a raw material in the production of [ \* \* \* ], but it is also used in pharmaceuticals, cosmetics and dental adhesives applications. This raw material does not have a U.S. supplier and the only supplies available are via imports.
- [ \* \* \* ]
  - This product is used to produce [ \* \* \* ] at [ \* \* \* ] facility and is in turn sold to a variety of different customers (including in the pharmaceutical/medical sectors) for use as a [ \* \* \* ]. In pharmaceutical manufacturing it also can be used to [ \* \* \* ] equipment and workspaces. It is also used as an [ \* \* \* ] in manufacturing processes.
- [ \* \* \* ]
  - This product is imported from [ \* \* \* ] and it is used as a raw material for the manufacturing of product used either directly or indirectly in pharmaceutical applications. The [ \* \* \* ] relies on this key input.
- [ \* \* \* ]
  - This product is used to support downstream customer medical countermeasures applications such as catheters, syringes etc.
- [ \* \* \* ]
  - This raw material is used by [ \* \* \* ] and has no U.S. suppliers and it must be imported.
- [ \* \* \* ]
  - This raw material is used by [ \* \* \* ] facility and has no U.S. suppliers and it must be imported.
- [ \* \* \* ]
  - This raw material is used by [ \* \* \* ], to manufacture [ \* \* \* ], however, it is also used in many other applications including pharmaceutical applications. [ \* \* \* ].
- [ \* \* \* ]
  - This catalyst is used by [ \* \* \* ].
- [ \* \* \* ]
  - This raw material is used in [ \* \* \* ], which is, in turn, used by [ \* \* \* ].
- [ \* \* \* ]
  - This input for production is used by [ \* \* \* ] facility to manufacture [ \* \* \* ].

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Arkema [\*\*\*] on the following [finished products that are paired with other finished products] at [\*\*\*] facility i.e., these products are [\*\*\*].

- [\*\*\*]

Arkema [\*\*\*] for sale to U.S. pharmaceutical/medical equipment manufacturers. [\*\*\*] are essential materials for [\*\*\*], which are life-saving medical devices for people who have severe life-threatening issues related to [\*\*\*]. This product should be [\*\*\*] for other essential medical devices as described above. In addition, [\*\*\*]. The Protocol is part of the Agreement on the Importation of Educational, Scientific, and Cultural Materials Act of 1982. [\*\*\*.]

Finally, Arkema supports the development and implementation of a transparent process so that tariff exclusion petitions could be considered, particularly in cases where no U.S. supply exists for a particular raw material. As part of such an exclusion process, companies should also be able to file objections to exclusion petition requests, for example to object to an exclusion petition request if the objecting company is, in fact, a U.S. supplier of such material/product.

Thank you, in advance, for your consideration of the above comments. Please do not hesitate to contact David Kunz, Deputy General Counsel, Government & Industry Affairs at david.kunz@arkema.com if you have any questions or if we can provide any additional information.