

PATIENTS FOR AFFORDABLE DRUGS™

May 6, 2025

The Honorable Howard Lutnik
Secretary of Commerce
U.S. Department of Commerce
1401 Constitution Ave NW
Washington, D.C. 20230

Re: Notice of Request for Public Comments on Section 232 National Security Investigation of Imports of Pharmaceuticals and Pharmaceutical Ingredients

Dear Secretary Lutnik:

Patients For Affordable Drugs (P4AD) appreciates the opportunity to offer comments on the Section 232 National Security Investigation of Imports of Pharmaceuticals and Pharmaceutical Ingredients.

P4AD is the only national patient advocacy organization focused exclusively on system-changing policies that lower prescription drug prices. We are bipartisan and do not accept funding from any entities that profit from the development or distribution of prescription drugs. Since we launched eight years ago, we have collected over 37,000 stories from all 50 states of patients who are struggling to afford their prescription drugs because of high prices.¹

The United States (U.S.) is facing a drug affordability crisis. One in three people in the U.S. cannot afford to pay for their prescription drugs. Americans unfairly pay between four and eight times more for brand-name drugs than people in other wealthy nations.² Older Americans are particularly vulnerable and are more likely to skip doses or forgo prescription refills due to cost – at more than double the rate in other countries.³

We applaud the Trump administration's commitment to addressing this national crisis, including the administration's support of the Medicare Drug Price Negotiation Program, which is set to deliver savings to 9 million beneficiaries and taxpayers in 2026, with millions more expected to benefit in the second round of negotiations for 15 of the most expensive drugs covered by Medicare. President Trump has long championed efforts to reduce drug prices, and while the Administration has made it clear that it is a priority, we are deeply concerned that levying pharmaceutical tariffs may run counter to this mission. Tariffs on drugs or active pharmaceutical ingredients (APIs) risk increasing prices for patients, disrupting fragile supply chains, and worsening ongoing drug shortages — particularly for low-cost generics that tens of millions of people rely on every day. These unintended consequences would jeopardize Americans' health and undermine the administration's efforts on drug affordability.

¹ (2024, June 20). *Patients For Affordable Drugs Map*. Patients For Affordable Drugs. <https://map.patientsforaffordabledrugs.org/>

² (2024, February 1) *International Prescription Drug Price Comparisons*. RAND Corporation. https://www.rand.org/pubs/research_reports/RRA788-3.html

³ (2024, December 5). *Healthcare Affordability for Older Adults: How the U.S. Compares to Other Countries*. The Commonwealth Fund. <https://www.commonwealthfund.org/publications/issue-briefs/2024/dec/health-care-affordability-older-adults-how-us-compares-other-countries>

Generic manufacturers, which operate on much narrower margins than brand-name drugmakers, will be more vulnerable to tariffs. Nearly 80 percent of generic drug tablets and capsules used in the U.S. are imported, and many essential medicines rely on ingredients sourced almost exclusively overseas. While expensive brand-name drugs may in theory be able to absorb some of the increased costs, in practice we anticipate pharmaceutical corporations would pass the increases along to patients. Tariffs on generics however may force generic companies to discontinue manufacturing critical low-cost generic drugs such as blood pressure medication or life-saving oncology drugs. Tariffs could also harm the supply chain and cause further shortages. The U.S. is already facing a record number of drug shortages on vital drugs including oncology medicines, antibiotics, and sterile injectables, and additional disruption could be catastrophic for American patients.

Recent polling shows that nearly 9 in 10 voters — across party lines — say prescription drugs are priced too high. Voters overwhelmingly believe drug companies prioritize profits over patients. We urge the administration to reconsider implementing tariffs on pharmaceuticals and negotiate a better deal for Americans through Medicare negotiation, international reference pricing, and bipartisan bills in Congress to increase competition in the market and prevent pharma lobbyists from rigging the system in their favor.

Thank you again for the opportunity to provide comments and would be happy to collaborate further

Sincerely,

A handwritten signature in black ink, appearing to read 'Merith Basey', with a stylized, cursive script.

Merith Basey MSc
Executive Director
Patients For Affordable Drugs