



中国医药保健品进出口商会

China Chamber of Commerce for Import
& Export of Medicines & Health Products

Address: 11-12F, NO. 6 Nanzhugan Hutong,
Dongcheng District, Beijing, China
Postcode: 100010
Tel: +0086-10-58036221/58036315
Fax: +0086-10-58036224/58036318

April 28, 2025

Eric Longnecker,
Deputy Assistant Secretary for Technology Security
Office of Strategic Industries and Economic Security,
Bureau of Industry and Security,
U. S. Department of Commerce

**RE: Comments on Section 232 National Security Investigation of
Imports of Pharmaceuticals and Pharmaceutical Ingredients
[BIS-2025-0022]**

Dear Mr. Eric Longnecker:

In response to a request from the Department of Commerce (DOC),
The China Chamber of Commerce for Import and Export of Medicines
and Health Products (CCCMHPIE) submits the following comments on
the Section 232 National Security Investigation of Imports of
Pharmaceuticals and Pharmaceutical Ingredients (ID: BIS-2025-0022,
Publication date April 16, 2025). CCCMHPIE serves as the voice of the
Chinese pharmaceutical industry in the public policy arena and advances
the international cooperation and exchanges to promote the global health.

CCCMHPIE and its member companies believe U.S. import of
pharmaceutical and pharmaceutical ingredient products from China does
not threaten to impair U.S. national security or the U.S. pharmaceutical
industry. Instead, the U.S. import of pharmaceutical and pharmaceutical

ingredient products from China is a beneficial complement to the U.S. pharmaceutical industry, and help to improve the competitiveness of U.S. pharmaceutical companies, accelerate the development of the U.S. pharmaceutical industry, and secure the public health in U.S. Any new tariffs on imports of pharmaceutical and pharmaceutical ingredient products resulting from this Section 232 Investigation will not only destabilize the global pharmaceutical supply chain but also pose a severe threat to U.S. patient healthcare access, while significantly undermining the investment interests of U.S. pharmaceutical companies and U.S. economic growth.

Therefore, CCCMHPIE and its member companies hopes that the United States will prudently handle this Section 232 Investigation. It is imperative to avoid the negative consequences of this unilateral trade restriction measures such as import tariffs, and instead foster healthy development of the pharmaceutical industry through collaborative efforts, thereby safeguarding global public health.

Sincerely,



Mr. ZHOU Hui

President of China Chamber of Commerce for Import and Export of

Medicines and Health Products

**Section 232 National Security Investigation of Imports of
Pharmaceuticals and Pharmaceutical Ingredients
[BIS-2025-0022]**

**Bureau of Industry and Security, Office of Strategic Industries and Economic
Security, U.S. Department of Commerce**

**CHINA CHAMBER OF COMMERCE FOR IMPORT AND EXPORT OF
MEDICINES AND HEALTH PRODUCTS**

WRITTEN SUBMISSION

The China Chamber of Commerce for Import and Export of Medicines and Health Products (“CCCMHPIE”) files this written statement pursuant to the request of the Bureau of Industry and Security, Office of Strategic Industries and Economic Security, U.S. Department of Commerce (“BIS”) in its notice of Request for Public Comments on Section 232 National Security Investigation of Imports of Pharmaceuticals and Pharmaceutical Ingredients (ID: BIS-2025-0022, Publication date April 16, 2025) (“Section 232 Investigations of Imports of Pharmaceuticals and Pharmaceutical Ingredients”).

CCCMHPIE, founded in 1989, is a national industrial and non-profit association. CCCMHPIE is formed jointly and voluntarily by various economic organizations engaged in manufacturing, import and export, and other related activities in the pharmaceuticals, medical devices and health products industries.

CCCMHPIE has more than 3,000 members, among them including a large number of pharmaceutical and pharmaceutical ingredients companies.

CCCMHPIE and its member companies believe U.S. import of pharmaceutical and pharmaceutical ingredient products from China does not threaten to impair U.S. national security or the U.S. pharmaceutical industry. Instead, the U.S. import of pharmaceutical and pharmaceutical ingredient products from China complements to the U.S. pharmaceutical industry, and helps to improve the competitiveness of U.S. pharmaceutical companies, accelerates the development of the U.S. pharmaceutical industry, and secures the public health in U.S. Any new tariffs on imports of pharmaceutical and pharmaceutical ingredient products resulting from this Section 232 Investigation will not only destabilize the global pharmaceutical supply chain but also pose a severe threat to U.S. patient healthcare access, while significantly undermining the investment interests of U.S. pharmaceutical companies and U.S. economic growth.

Therefore, CCCMHPIE and its member companies hope that the United States will prudently handle this Section 232 Investigation. It is necessary to avoid the negative consequences of this unilateral trade restriction measures such as import tariffs. We advocate for bilateral cooperation to establish a stable trade framework that supports sustainable development of the pharmaceutical sector while fulfilling our shared responsibility to protect public health worldwide.

I TRADE RESTRICTION MEASURES JEOPARDIZE GLOBAL PHARMACEUTICAL SUPPLY CHAIN STABILITY

International trade cooperation plays a vital role in the global pharmaceutical supply chain. Over decades of development, the U.S. and China have established a

highly complementary relationship. The U.S. pharmaceutical industry focuses on innovation, specializing in R&D, production, and global market expansion of novel drugs - positioning itself at the high-value end of the supply chain. China, on the other hand, excels in manufacturing, particularly in pharmaceutical ingredients production, generic drug manufacturing, and large-scale pharmaceutical production, providing critical support to U.S. drug-makers.

Pharmaceutical and pharmaceutical ingredient production requires massive capital investment, stringent technical expertise, and lengthy construction cycles. Rebuilding domestic U.S. capacity would take at least five years, hampered by high production costs and environmental regulations, making it impossible to replace Chinese supplies in the short term. Drug manufacturing relies on multinational collaboration. However unilateral trade restriction measures such as import tariffs on Chinese pharmaceutical and pharmaceutical ingredient products would disrupt global supply chains, destabilize the U.S. pharmaceutical industry, and ultimately burden U.S. businesses and the public.

II TRADE RESTRICTION MEASURES THREATEN U.S. PATIENT HEALTHCARE ACCESS

Drug accessibility and affordability are directly tied to the patient health. According to disclosures by the U.S. Food and Drug Administration (FDA), 80% of U.S. pharmaceutical ingredients are imported, primarily from China and India, with 70% of India's pharmaceutical ingredients supply itself dependent on China - including antibiotics, antipyretics, antihypertensives, cardiovascular drugs, psychotropics, and anticancer medications. The Association for Accessible

Medicines (AAM) projects that a 25% tariff on Chinese pharmaceutical ingredients could raise U.S. generic drug prices by 30-50%.

Emergency drug shortages would also worsen. As reported by The Wall Street Journal, current U.S. “reciprocal tariffs” have already spiked prices of heparin, a life-saving anticoagulant for thrombosis patients. With 60% of U.S. heparin pharmaceutical ingredients sourced from China, tariffs could create a 30% short-term supply gap. Heparin shortages or stock-outs would endanger millions of patients, potentially forcing reliance on costly gray-market or counterfeit drugs with severe safety risks. Unilateral trade restriction measures such as import tariffs would thus exacerbate supply shortages, undermine drug affordability, and disproportionately harm low-and middle-income Americans.

**III TRADE RESTRICTION MEASURES HARM U.S.
PHARMACEUTICAL COMPANIES INTERESTS AND ECONOMIC
GROWTH**

Strategic global investments by U.S. pharmaceutical companies, particularly in emerging markets like China, play a pivotal role in advancing international collaborative frameworks and driving technological innovation. Many drugs manufactured in China by U.S. companies are exported to the U.S. market. Pfizer's publicly disclosed supply chain data demonstrate that 83% of active pharmaceutical ingredients essential for manufacturing its blockbuster drug Lipitor are sourced from Chinese suppliers. Industry analyses warn that U.S. import tariffs on pharmaceutical ingredients could cost Pfizer an additional \$2.7 billion annually, forcing a choice between production halts or 45% price hikes - directly endangering millions of U.S. patients.

Unilateral trade restriction measures would not only hurt U.S. pharmaceutical companies' profits but also cripple global R&D cooperation and innovation as well as heighten supply chain fracture risks. According to the IQVIA Institute's report on Global Medicine Supply Chain Vulnerability Assessment (2024), a Chinese pharmaceutical ingredients disruption could set back global drug production by 6-10 years. The International Generic and Biosimilar Medicines Association (IGBA) cautions that sudden restrictions on Chinese supply chains would be a "blunt instrument", potentially reversing global pharmaceutical accessibility by 8-12 years.

The U.S. pharmaceutical sector employs over 1 million people directly so that supply chain turmoil could trigger tens of thousands of job losses. The AAM warns that small-and mid-sized U.S. drugmakers may face mass bankruptcies due to the cost surges. As a strategic asset and innovation engine for the U.S. economy, pharmaceutical industry instability would have far-reaching economic repercussions.

IV UPHOLD MULTILATERAL TRADE RULES AND REJECT ABUSE OF NATIONAL SECURITY EXCEPTIONS

As a primary architect and participant in the post-WWII international economic order and multilateral trading system, the United States should lead by example in complying with multilateral trade rules and resolving trade disputes with other WTO members through the WTO's dispute settlement mechanism. The Agreement on Trade-Related Aspects of Intellectual Property Rights (TRIPS) explicitly promotes free trade in pharmaceuticals to safeguard global public health security.

However, the U.S. Section 232 investigations, under the pretext of "national security," constitute de facto trade restrictions and negotiation coercion. These measures not only infringe upon the legitimate rights of other countries and regions but also violate U.S. international obligations, undermining the multilateral trading system. Multiple WTO members, including China and the EU, have challenged the U.S. Section 232 restrictions on steel and aluminum imports before the WTO dispute settlement body. During the proceedings, the WTO panel unequivocally ruled that these measures breach core obligations binding all WTO members.

Historical precedent demonstrates the dangers of such unilateralism. In 2018, the U.S. imposed Section 232 tariffs on steel and aluminum imports, which severely harmed downstream industries (e.g. automotive, construction, and machinery) in U.S. through inflated input costs, resulting in about 75,000 job losses. If the U.S. replicates this approach for pharmaceuticals and pharmaceutical ingredients, the consequences would be far more devastating - with deeper, longer-lasting impacts than the steel and aluminum 232 tariffs. Patients, businesses, and the healthcare system would all bear the brunt, with no short-term relief in sight.

V CONCLUSION

In summary, CCCMHPIE believes that U.S. imports of Pharmaceuticals and Pharmaceutical Ingredients from China do not threaten to impair the national security and industrial security of the United States. Instead, the United States' abusive invocation of "national security" to impose trade restrictive measures such as import tariffs on pharmaceutical and pharmaceutical ingredient products under this Section 232 Investigation will severely harm the U.S. general economic

welfare, the interests of the U.S. pharmaceutical companies and the industry, pharmaceutical employment and the public health in U.S.

As a key participant in the global pharmaceutical supply chain, China remains firmly committed to the principles of openness and cooperation, making active contributions to ensuring global medicine accessibility. Any unilateral tariff or trade restriction measure would contravene multilateral trade rules and run counter to the public interests of both China and the United States, as well as the global community.

The U.S. import of pharmaceutical and pharmaceutical ingredient products from China is a beneficial complement to the U.S. pharmaceutical industry, and help improve the competitiveness of U.S. pharmaceutical companies, accelerate the development of the U.S. pharmaceutical industry, and secure the public health in U.S.

Therefore, CCCMHPIE hopes that the United States conducts this Section 232 Investigation with extreme caution. Any trade restrictive measure such as import tariff resulting from this Investigation will lead to the negative impacts on U.S. pharmaceutical industries and the general economic welfare as discussed above. Rather than pursue any trade restrictive measure, the United States should promote the healthy development of its domestic pharmaceutical industry through enhanced communication and cooperation with its trading partners.

中国医药保健品进出口商会关于美国启动 药品及药品原料 232 国家安全调查 的评论意见

中国医药保健品进出口商会（以下简称“医保商会”）谨代表其会员企业对美国本次 232 调查发表评论意见。医保商会是由在中国境内从事医药产品生产和进出口贸易及相关活动的各种经济类型组织自愿结成的行业性、全国性和非营利性的社会组织，现有会员企业 3000 多家，其中包括千余家药品及药品原料企业。

医保商会及其会员企业认为，中国输美药品及药品原料并不威胁美国制药产业及国家安全，反而在增强美国制药企业竞争力、促进美国制药行业发展、保障美国公众健康等方面存在诸多积极影响。如对药品及药品原料加征关税将不仅会破坏全球医药供应链的稳定性，还会对美国患者医疗保障造成严重威胁，并严重损害美国制药企业投资利益和美国经济发展。

因此，医保商会及其会员企业希望美方慎重对待此次 232 调查，避免因关税等单边贸易限制措施带来的负面影响，通过共同合作促进制药行业健康发展，维护全球公众健康福祉。

一、贸易限制措施危及全球药品供应链稳定

在全球医药供应链中，国际贸易合作扮演着至关重要的角色。经过数十年发展，中美两国已形成了较强的互补关系。美国制药产业注重创新，专注于创新药研发、生产以及全球市场拓展，位居产业链高端环节，能够创造高附加值的产品和服务。中国侧重生产制造，在原料药生产、仿制药制造以及药品大规模生产上具有优势，能够为美国制药企业提供生产制造方面的支持。药品和药品原料生产设施投资大，技术要求严格，建设周期长。美国本土药品和药品原料产能重建至少需 5 年，且面临生产成本高、环保压力大等障碍，短期内无法填补中国供应缺口。药品生产涉及多国协作，如果对中国药品和药品原料产品实施单边贸易限制措施，将扰乱全球产业链，反噬美国自身制药产业稳定性，其危害后果最终会由美国企业和民众买单。

二、贸易限制措施威胁美国患者医疗保障

药品的可及性和可负担性直接关系到患者的健康。根据美国食品和药物管理局(FDA, Food and Drug Administration)披露的文件，美国 80% 的原料药来都自海外，大部分依赖中国和印度，印度 70% 的原料药又依赖中国，包括抗生素、解热镇痛、降压药、心血管药、精神类药物、抗癌药等等。另据美国可及性药物协会(AAM, Association for Accessible Medicines)的预测，若对中国原料药加征 25% 关税，美国仿制药价格可能上涨 30%-50%。此外，美国急救药品短缺风险

也将加剧。根据美国华尔街日报报道，美国当前的“对等关税”措施已大幅推高美国患有血栓的病人每天都需要注射的抗凝血剂——肝素的价格。美国 60% 的肝素原料药依赖中国，加征关税可能导致短期内 30% 的供应缺口。因关税导致的肝素短缺甚至“断供”，将影响美国千万患者的生命安全。患者或将被迫依赖高价代购或黑市药品，存在严重的安全隐患。因此，如果对中国药品和药品原料产品实施单边贸易限制措施，将加剧美国供应的短缺，严重影响药品的可及性和价格稳定性，损害民众的健康福祉，尤其会严重影响美国相关中低收入群体的医疗保障。

三、贸易限制措施损害美国药企利益及美国经济发展

美国制药企业在包括中国在内的全球市场有大量投资，这些投资对于推动全球医药产业合作和技术创新具有重要意义。美国制药企业在中国生产的药品有不少会返销美国市场。根据美国辉瑞公司供应链披露文件，其生产的立普妥（Lipitor）的活性成分 83% 来自中国。行业分析报告称，若对中国原料药加征关税，辉瑞将面临年增 27 亿美元生产成本的困境，被迫在“停产”与“药价上涨 45%”间抉择，直接威胁美国数千万患者的用药安全。因此，单边贸易限制措施不仅直接损害美国制药企业的利益，严重打击全球医药产业合作和研发创新，更会推高全球药品供应链断裂的风险。根据《全球医药供应链脆弱性评估》（2024 年，IQVIA Institute），

若中国原料药供应中断，全球药品生产可能面临 6-10 年的倒退。国际仿制药协会（IGBA，International Generic and Biosimilar Medicines Association）也已发表声明，强调“对中国供应链的突然限制是无差别打击，可能使全球药品可及性倒退 8-12 年。”美国制药行业直接就业人数超 100 万，若全球供应链出现动荡，可能导致数万人失业。美国可及性药物协会（AAM, Association for Accessible Medicines）已经警告，美国中小型制药企业将因成本上升而大规模破产。制药行业是美国经济的技术引擎和战略资产，其创新力、就业质量与全球影响力举足轻重。美国制药企业和产业的动荡将直接影响美国自身经济的发展。

四、支持多边贸易体制，反对滥用国家安全例外条款

美国作为二战结束后国际经济秩序和多边贸易体制的主要建立者和参与者，应该带头遵守多边贸易规则，在世界贸易组织框架下通过争端解决机制妥善处理与其他世界贸易组织成员之间的贸易摩擦。《与贸易有关的知识产权协定》（TRIPS）明确鼓励药品自由贸易，以确保全球公共卫生安全。美国的 232 调查以国家安全之名，行贸易限制和谈判施压之实，不仅损害其他国家和地区的合法权益，还违反了美国的国际义务，破坏了多边贸易体制。包括中国、欧盟在内的多个世界贸易组织成员将美国对进口钢铝产品实施的 232 限制措施诉至世界贸易组织争端解决机制。在争端解决程序

中，世界贸易组织专家组明确认定美国的 232 钢铝措施违反世界贸易组织成员必须遵守的核心义务。实际上，美国的 232 钢铝措施也造成美国下游制造业（如汽车、建筑、机械等）因原材料成本上升损失严重，并因此减少 7.5 万个岗位。以史为鉴，美国如基于此次调查针对药品及药品原料的进口加征关税，将会重蹈覆辙，其影响深度将远超 2018 年钢铁和铝产品关税，且短期内无法缓解，美国的患者、企业和医保三方都会成为牺牲品。

五、结论

综上，我们认为从中国进口药品及药品原料不会损害美国国家安全和产业安全，美国滥用国家安全条款对进口药品及药品原料发起 232 调查有损于美国整体经济、制药企业和产业、制药产业工人和美国公众的切身利益。

中国作为全球医药产业链的重要参与者，始终秉持开放合作原则，为保障全球药品可及性作出积极贡献。任何单边关税或贸易限制措施，均违背多边贸易规则，不符合中美两国及全球公共利益。

中国输美的药品及药品原料对于增强美国制药企业竞争力、促进美国制药行业发展、保障美国公众健康等方面存在诸多积极影响。因此，医保商会及其会员企业希望美方慎重对待此次 232 调查，避免关税等单边贸易限制措施带来的负面影响，通过共同合作促进制药行业健康发展。