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RE: Section 232 National Security Investigation of Imports of Pharmaceuticals and Pharmaceutical Ingredients

Dear Deputy Assistant Secretary Longnecker,

Thank you for the opportunity to provide input on the Department of Commerce's Section 232 investigation into pharmaceutical imports.

The Alliance for Aging Research is the leading nonprofit organization dedicated to changing the narrative to achieve healthy aging and equitable access to care. The Alliance writes on behalf of millions of older Americans whose health and well-being depend on consistent and affordable access to life-saving medications, strongly urging the Department of Commerce not to impose tariffs on pharmaceuticals and active pharmaceutical ingredients (APIs), which are an indispensable source of treatments for many Americans.

As you know, [Section 232](#) of the Trade Expansion Act of 1962 authorizes the President to impose tariffs when specific imports pose a threat to national security. While the Alliance affirms the President's stance that the US should strengthen our domestic production of pharmaceuticals, tariffs are a blunt instrument that would likely lead to shortages, inaccessibility of care, price increases for consumers, and worse relationships with allied countries.

The older adult population disproportionately relies on prescription medications to manage complex health issues such as cancer, heart disease, diabetes, Alzheimer's, and autoimmune disorders. [Nearly nine in 10](#) older adults ages 65 and older take at least one prescription medication. [More than two-thirds](#) take three or more medications. Yet unlike consumers in other tariffed sectors, who can choose between different makes of tech products or vehicles, patients do not choose the medicines they are prescribed.

For many conditions, therapeutic options are extremely limited. Oftentimes, patients may face a disease that can only be treated with a single medication that's sourced from abroad. Tariffs on all imported medicines would introduce unavoidable barriers to access for patients whose treatments happen to be manufactured overseas.

Further, [generic drugs come primarily from India](#) and make up 90 percent of the U.S. prescription volume. Generics play a major role in ensuring that medications are accessible to consumers, saving money without compromising on quality or efficacy.

The proposed tariffs would severely disrupt access to essential medical technologies that rely on the same complex global supply chains as pharmaceuticals. Many advanced diagnostics, imaging agents, and injectable therapies depend on imported pharmaceutical components or are manufactured entirely abroad. In 2024, the United States imported over \$7 billion in pharmaceutical products from Japan alone—products that often include specialized agents used in nuclear medicine and diagnostic imaging ([U.S. Census Bureau, Foreign Trade Data, 2024 - pg. 17](#)). Tariffs on these technologies would increase costs and risk shortages, limiting hospitals' ability to deliver timely and accurate diagnoses. In an era where early detection and targeted treatments are critical to quality care, such disruptions would directly threaten patient outcomes and strain health systems already operating on tight margins.

Even drugs that are manufactured domestically often rely on APIs supplied by trusted allies. About [30% of the dollar value](#) of APIs used in medicines consumed throughout the United States originates from European Union member states alone. The economic repercussions of blanket tariffs would therefore be significant.

A 25% tariff on these allies would add tens of billions in costs to our already-struggling healthcare system—costs that would inevitably fall on patients, including older Americans on fixed incomes. These patients, many of whom depend on federal programs like Medicare or Medicaid, are especially vulnerable to sudden price increases and disruptions in treatment. It is unconscionable that medical care be disrupted for any reason that is not strictly necessary.

Older adults, and all Americans, rely on our health systems to provide quality and dependable care so that their day-to-day lives can continue in the free and fair society that has been promised to them. For this reason, U.S. trade policy has long [acknowledged](#) that medicines are essential goods—not ordinary commodities—and protected them from the volatility of trade disputes. Tariffs on these products would run counter to that longstanding, bipartisan consensus and undermine government efforts to protect public health.

The Alliance for Aging Research urges the Department of Commerce to reaffirm that medicines do not constitute a threat to national security and should remain exempt from Section 232 tariffs. Older patients should be able to meet with their health care providers, often alongside family caregivers, to discuss the benefits and risks of whether to take a drug or not. The politics of U.S. tariff policy should not come between patients and their doctors, in terms of that assessment.

Sincerely,



Adina Lasser
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Alliance for Aging Research