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April 29, 2025

Howard Lutnick  
Secretary of Commerce  
Bureau of Industry and Security  
Department of Commerce  
Washington, D.C., United States

**Subject: XRIN 0694-XC120 Notice of Request for Public Comments on Section 232 National Security Investigation of Imports of Pharmaceuticals and Pharmaceutical Ingredients**

On behalf of Life Sciences Ontario (LSO), thank you for the opportunity to provide input on **XRIN 0694-XC120** Notice of Request for Public Comments on Section 232 National Security Investigation of Imports of Pharmaceuticals and Pharmaceutical Ingredients.

LSO is a not-for-profit organization that represents and promotes Ontario, Canada's vibrant and diverse life sciences sector. Our membership includes global biopharmaceutical companies, many of which are U.S.-headquartered, along with multinational players across the pharmaceutical, biotech, and medical device industries. These organizations are deeply embedded in the integrated North American pharmaceutical supply chain and are instrumental in delivering innovation, research, development, and manufacturing that support patients and healthcare systems in both the United States and Canada.

We recognize and support the U.S. administration's goal of strengthening national security and resilient supply chains of medicines. LSO is engaging in this consultation because decisions made under this investigation will have direct cross-border implications. Canada and the United States share one of the world's most closely connected pharmaceutical trade relationships. Canadian facilities supply essential medicines, vaccines, and active pharmaceutical ingredients (APIs) to the U.S. market, just as U.S. firms do the same for Canada. This cross-border collaboration is critical to the health and economic security of both countries. Any disruption to this supply chain – whether through tariffs or other trade restrictions – could have serious unintended consequences, including potential drug shortages, higher healthcare costs due to added manufacturing and distribution expenses, and diminished research and development (R&D) investment, threatening long-term health security and innovation ecosystems.

However, the global pharmaceutical supply chain's critical dependence on China presents a serious national security concern for both Canada and the U.S. China manufactures 44% of APIs globally and holds 55% of the global Fine Chemical market, resulting in a significant portion of global APIs being made by or dependant on key ingredients from China.<sup>1,2</sup> Canada and the U.S. must continue to work together to build continental capabilities to protect our supply chain resiliency.

For these reasons, we ask the U.S. Department of Commerce to:

- 1) Ensure that medicines and all ancillary related products, vaccines, medical devices, and critical inputs for their manufacturing are explicitly excluded from any tariffs or Section 232 measures, now and in the future.
- 2) Pursue bilateral engagement with Canada to address national security concerns collaboratively, rather than through unilateral trade actions that could unintentionally harm patients and economies on both sides of the border.
- 3) Work jointly with Canada to enhance the resilience of pharmaceutical supply chains and strengthen complementary capabilities to support one another, ensuring preparedness for future health emergencies.

Thank you for the opportunity to contribute to this important consultation. We remain committed to supporting open dialogue and shared solutions that protect patient health, uphold supply chain integrity, and ensure reliable, secure, and affordable access to medicines and medical products for Canadians and Americans alike.

Please do not hesitate to reach out to me if you require clarification or have any additional questions regarding the recommendations made in this submission.

Sincerely,

A handwritten signature in black ink, appearing to read 'Jason Field', is positioned above the typed name.

Jason Field  
President & CEO  
Life Sciences Ontario  
C: (647) 821-3392; [jason.field@lifesciencesontario.ca](mailto:jason.field@lifesciencesontario.ca)

### **About Life Sciences Ontario**

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<sup>1</sup> <https://www.statista.com/statistics/1498065/api-production-volume-by-region/>

<sup>2</sup> <https://www.statista.com/statistics/1330685/global-specialty-chemical-sales-share-by-country/>

Life Sciences Ontario (LSO) is a not-for-profit organization that represents and promotes Ontario's vibrant and diverse life sciences sector. Members of LSO include life sciences companies, entrepreneurs, members of academia, and service providers from many different areas of the life sciences ecosystem, including biopharmaceuticals, agriculture, agri-food, the bioeconomy, medical devices, animal health, environmental technologies, and more.

