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Rising Trade Tensions in Health Care: The Section 232 Medical Supply Tariffs

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The U.S. Department of Commerce's Bureau of Industry and Security (BIS) has launched a Section 232 national security investigation into imports of personal protective equipment (PPE), medical consumables, and medical equipment, including devices.

The probe aims to assess whether these imports threaten U.S. national security, potentially paving the way for new tariffs or import restrictions. Public comments are being solicited until October 17, 2025, as the Trump administration accelerates its trade agenda.

President Trump has signaled the possibility of sweeping new tariffs across multiple sectors, from pharmaceuticals to furniture, trucks, and more, slated to begin October 1, albeit with potential carve-outs and trade partner exceptions (notably for the EU and Japan).

What Is Section 232 and Why Now?

Section 232 of the Trade Expansion Act of 1962 empowers the president to impose tariffs or other restrictions on imports to protect national security. The law has been a cornerstone of President Trump's trade policy. The administration has revived and expanded this tool, initiating investigations into more than a dozen sectors, from semiconductors and pharmaceuticals to timber, automobiles, and automotive parts.

The medical supplies investigation, initiated by the commerce secretary on September 2, 2025, comes amid heightened concerns over supply chain vulnerabilities exposed during the COVID-19 pandemic. As detailed in the *Federal Register* notice, this probe excludes pharmaceuticals, such as prescription drugs and biologics, which are under a separate Section 232 review launched earlier this year. Instead, it focuses on critical health care items essential for patient care and pandemic response.

Scope of the Investigation: What's Covered?

The investigation defines the categories broadly to capture a wide range of health care imports:

- PPE: Items used in health care settings, including surgical masks, N95 respirators, gloves, gowns, and related components.
- Medical Consumables: Single-use or short-term items for diagnosis, treatment, and prevention, such as syringes, needles, IV bags, catheters, sutures, diagnostic reagents, and anesthesia equipment. (Pharmaceuticals are explicitly excluded.)

- Medical Equipment: Durable tools like wheelchairs, crutches, and hospital beds.
- Medical Devices: Instruments for diagnosis, monitoring, or treatment, including pacemakers, insulin pumps, stents, hearing aids, prosthetics, blood glucose monitors, CT scanners, MRI machines, ventilators, and X-ray equipment.

BIS emphasizes that the probe will evaluate dependencies on foreign suppliers, particularly from major exporters, and risks like export restrictions or "weaponization" of supply chains by adversarial nations.

Key Issues for Public Comment

BIS is particularly interested in data and analyses addressing 12 specific criteria from the National Security Industrial Base Regulations (15 CFR Part 705), including:

1. Current and projected U.S. demand for these items.
2. Domestic production's ability to meet that demand.
3. Role of foreign supply chains in fulfilling U.S. needs.
4. Concentration of imports from a few suppliers or countries and associated risks.
5. Impact of foreign subsidies and predatory practices on U.S. competitiveness.
6. Economic effects of artificially low prices from unfair trade.
7. Potential for foreign export bans or supply manipulation.
8. Feasibility of boosting domestic capacity to reduce import reliance.
9. Effects of existing trade policies and the need for new measures like tariffs or quotas.
10. Risks of foreign control over supply chains.
11. Ability of foreign entities to exploit attributes of imported goods.
12. Any other relevant factors.

This investigation could lead to tariffs on goods like surgical masks, blood glucose monitors, and wheelchairs, potentially by spring 2026. While Section 232 probes have a 270-day timeline, the Trump administration has expedited recent ones, such as copper tariffs implemented in just 144 days.

How to Submit Comments

Stakeholders, including manufacturers, importers, health care providers, and trade groups, can submit comments via Regulations.gov under docket BIS-2025-0258 (RIN 0694-XC134). Submissions must be received by October 17, 2025. Business confidential information should be marked accordingly, with a public version provided. No public hearing is planned, consistent with recent Section 232 processes.

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