July 17, 2025

The Honorable Howard Lutnick
Secretary
U.S. Department of Commerce
1401 Constitution Avenue NW
Washington, DC 20230

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

Dear Secretary Lutnick,

On behalf of the American Association of Physicists in Medicine (AAPM), American College of Cariology (ACC), American College of Radiology (ACR), American Society of Nuclear Cardiology (ASNC), American Society for Radiation Oncology (ASTRO), and Society of Nuclear Medicine and Molecular Imaging (SNMMI) we write to express concern about the potential impact of the Department of Commerce Section 232 investigation on the import of pharmaceuticals and pharmaceutical ingredients. Nuclear medicine, widely used across the U.S. to diagnose and treat patients, relies on radiopharmaceuticals and medical isotopes for essential care. However, Section 232 tariffs or trade restrictions could significantly raise healthcare costs and jeopardize patient access - especially for radiopharmaceuticals and medical isotopes that have no domestic supplier.

The U.S. remains heavily reliant on foreign sources for key medical isotopes. For example, approximately 80% of diagnostic nuclear medicine procedures depend on technetium-99m (Tc-99m), which is produced from molybdenum-99 (Mo-99). All Mo-99 is currently produced overseas by long-established research reactors and processors in Europe, South Africa, and Australia. In response, Congress passed the American Medical Isotope Production Act (AMIPA) in 2012, providing federal support through cost-sharing and national lab resources. Since then, the DOE NNSA Mo-99 Program and private investors have committed over $1 billion, yet no domestic supply exists due to persistent high costs and strict regulatory barriers. While Tc-99 highlights this foreign dependence, U.S. patients also rely on internationally sourced radiopharmaceuticals, medical isotopes, active pharmaceutical ingredients (APIs), and precursors for medical care. As a result, the supply chain remains fragile and subject to disruptions from geopolitical instability, trade restrictions, or unplanned outages. These challenges are compounded by dependencies on specialized international equipment without which U.S.-based radiopharmaceutical production cannot operate.

Radiopharmaceuticals and the medical isotopes used for the diagnosis and treatment of diseases, such as cancer, cardiovascular disease, Alzheimer's, and Parkinson's, have unique characteristics due to their short shelf lives due to rapid radioactive decay, limited global production sources, and the absence of a robust domestic supply chain. In many instances, there are no clinical alternatives to the radiopharmaceuticals and medical isotopes physicians

rely on. Yet today, many radiopharmaceuticals, medical isotopes, APIs, and precursors are sourced entirely from foreign sources.

Our physicians and healthcare professionals generally support President Trump's efforts to ensure domestic availability of pharmaceuticals and pharmaceutical ingredients. Over a decade of joint industry and federal efforts has yet to establish a reliable U.S. supply of critical radiopharmaceuticals, medical isotopes, APIs, and precursors, due to high costs, regulatory barriers, and dependence on specialized foreign equipment. Given this, experts and key opinion leaders in our organizations, that focus on ensuring high quality patient care, are deeply concerned that tariffs or trade restrictions on these materials and specialized equipment could result in:

- **Increased costs such as those from tariffs** are likely to be passed on to patients or absorbed by hospitals, potentially limiting patient access and straining healthcare systems;
- **Delays in critical testing** for conditions like heart attack, pulmonary embolism, or cancer staging may delay critical and time sensitive diagnostic testing;
- **Disproportionate impacts** on Medicare populations and hospital systems already operating under financial pressure.

Given these concerns, we respectfully urge the Administration to:

1) **Exclude or defer tariffs** on radiopharmaceuticals, medical isotopes, APIs, precursors, and related production equipment from the Section 232 tariffs until adequate domestic supply is achieved;
2) **Continue collaborating with stakeholders** across clinical and industry sectors to strengthen domestic production capacity through targeted incentives, streamlined regulatory pathways, and investment in specialized workforce development;
3) **Support long-term resilience** by developing a coordinated national strategy for radiopharmaceutical supply chain security that includes contingency planning for future disruptions.

Our organizations remain committed to the Administration's goal of building a resilient, secure pharmaceutical supply chain. We welcome the opportunity to further engage with the Department of Commerce and other federal agencies to ensure that critical diagnostic and therapeutic procedures remain accessible to patients in every community. Please contact any of the following with questions: David Crowley, AAPM Government Affairs Specialist at dcrowley@aapm.org, James Vavricek, ACC Director Federal Regulatory Affairs at jvavricek@acc.org, Michael Peters, ACR Senior Director, Government Affairs at mpeters@acr.org, Georgia Lawrence, ASNC Director, Regulatory Affairs at glawrence@asnc.org, Cindy Tomlinson, ASTRO Senior Patient Safety and Regulatory Affairs Manager at cindy.tomlinson@astro.org, and Julia Bellinger, SNMMI Director, Health Policy and Regulatory Affairs at JBellinger@snmmi.org.

Sincerely,

American Association of Physicists in Medicine (AAPM)
American College of Cardiology (ACC)
American College of Radiology (ACR)
American Society of Nuclear Cardiology (ASNC)
American Society for Radiation Oncology (ASTRO)
Society of Nuclear Medicine and Molecular Imaging (SNMMI)

cc: Jeffrey Kessler, Under Secretary for Office of Industry and Security, U.S. Department of Commerce
Sushan Demirjian, Assistant U.S. Trade Representative, Office of the United States Trade Representative
Brittany Kelm, Policy Adviser, National Energy Dominance Council, Executive Office of the President
Chris Landers, Director, U.S. Department of Energy, Isotope Program