May 7, 2025

The Honorable Howard Lutnick
Secretary
Bureau of Industry and Security
Office of Strategic Industries and Economic Security
Department of Commerce
1401 Constitution Avenue NW
Washington, DC 20230

Re: Notice of Request for Public Comments on Section 232, National Security Investigation of Imports of Pharmaceuticals and Pharmaceutical Ingredients

Dear Secretary Lutnick:

On behalf of the American Society of Nuclear Cardiology (ASNC) and the American College of Cardiology (ACC), we appreciate the opportunity to comment on the effects on national security of imports of pharmaceuticals and pharmaceutical ingredients as part of the investigation initiated under Section 232, National Security Investigation of Imports of Pharmaceuticals and Pharmaceutical Ingredients, and published in the *Federal Register* on April 16, 2025.[1]

ASNC is a greater than 5,700-member professional medical society that provides a variety of continuing medical education programs related to the role of nuclear cardiology in patient-centered cardiovascular imaging, develops standards and guidelines for training and practice, promotes accreditation and certification within the nuclear cardiology field, and is a major advocate for furthering research and excellence in nuclear cardiology. ACC is a global leader dedicated to transforming cardiovascular care and improving heart health for all. For more than 75 years, the ACC has empowered a community of over 60,000 cardiovascular professionals across more than 140 countries with cutting-edge education and advocacy, rigorous professional credentials, and trusted clinical guidance.

Nuclear cardiologists diagnose and treat coronary artery disease (CAD) in millions of patients each year in the United States. To diagnose CAD and other cardiovascular conditions, imaging physicians rely on the use of radiopharmaceuticals to visualize physiologic and anatomic

[1] Notice of Request for Public Comments on Section 232, National Security Investigation of Imports of Pharmaceuticals and Pharmaceutical Ingredients, 90 Fed. Reg. 15951 (Apr. 16, 2025).

structures of the heart. Radiopharmaceuticals used in imaging services are produced by suppliers in the European Union, Canada, Australia, and South Africa and are subject to a complex supply chain resulting from the short shelf-life of radiopharmaceuticals that quickly decay.

ASNC has supported past efforts to onshore radiopharmaceutical production, including support of the American Medical Isotope Production Act (AMIPA), which Congress passed in 2012. AMIPA recognized the urgent need for domestic production of Molybdenum-99 (Mo-99) and the imperative of reducing reliance on foreign suppliers to ensure a reliable domestic supply for medical procedures. Mo-99 is a radioactive isotope used in myocardial perfusion imaging to detect heart disease. Despite the aims and efforts of AMIPA, there is still no domestic source of Mo-99 available because of barriers that confront manufacturers, including regulatory hurdles and cost.

ASNC's priority remains limiting deleterious effects such as test inaccessibility or delays in appropriate testing to patients . We ask the Administration to defer tariffs for radiopharmaceuticals, medical isotopes, and specialized equipment needed to produce radiopharmaceuticals until a sufficient domestic supply can be established. This will ensure patients continue receiving optimal care from the nuclear cardiology community as efforts to establish domestic manufacturers across the United States continue.

If you have questions or require additional information, please contact Georgia Lawrence, ASNC's Director of Regulatory Affairs, at glawrence@asnc.org.

Sincerely,

Panithaya Chareonthaitawee, MD
President
American Society of Nuclear Cardiology

Christopher Kramer, MD, FACC
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