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INTRODUCTION

The New Jersey Business & Industry Association (NJBIA) respectfully submits these comments regarding the U.S. Department of Commerce's Section 232 national security investigation of imports of personal protective equipment (PPE), medical consumables, and medical equipment.

NJBIA is the largest and most impactful statewide business association in New Jersey and the nation, representing thousands of employers in every sector and region throughout the Garden State. Our members include leading manufacturers, healthcare innovators, suppliers, and logistics providers whose operations are integral to America's medical manufacturing base and national preparedness.

NJBIA strongly supports the Department's goal, President Trump's goal and the entire nation's goal of strengthening domestic manufacturing capacity for essential medical products that are critical to national security. However, we urge caution in using tariff-based approaches that may unintentionally undermine this goal and therefore **recommend excluding the medical device industry from any proposed tariffs.**

MANUFACTURING IS CENTRAL TO U.S. AND NATIONAL SECURITY

Manufacturing is the foundation of America's innovation, workforce, and national resilience. In New Jersey alone, manufacturing contributes more than **\$57 billion annually to the state's economy** and supports over **240,000 direct jobs**—many of which are in advanced manufacturing sectors producing medical devices, pharmaceuticals, and precision instruments.

New Jersey is widely recognized as a **national life sciences hub**, hosting more than **400 medical technology and device companies**, alongside 14 of the

world's top 20 biopharmaceutical firms. These companies design, test, and manufacture everything from diagnostic instruments and orthopedic devices to advanced wound care products and PPE.

During the COVID-19 pandemic, New Jersey manufacturers rapidly pivoted to produce critical medical goods—from respirator components and face shields to ventilator parts and testing equipment. These efforts demonstrated that when America needs to ramp up production to protect public health, New Jersey's manufacturers are ready and capable partners.

This capacity is a core part of the nation's industrial and security infrastructure. Ensuring its stability and competitiveness must be a top policy priority.

GLOBAL SUPPLY CHAINS ARE ESSENTIAL TO DOMESTIC MANUFACTURING STRENGTH

Even the most successful U.S. manufacturers depend on global supply chains for specialized inputs and materials that are not available domestically at the necessary scale or quality.

In the medical device sector, many components—such as medical-grade polymers, sensors, microelectronics, and precision tubing—are sourced internationally from FDA-approved suppliers. These parts are then integrated into final devices assembled and tested at U.S. facilities that meet rigorous regulatory and safety standards.

Disrupting this supply chain through tariffs or broad import restrictions could:

- Increase input costs for U.S. manufacturers,
- Delay production timelines for critical medical products,
- Reduce competitiveness against foreign producers, and
- Ultimately raise prices for hospitals, clinics, and patients.

Rather than strengthening national security, such disruptions could weaken the very domestic manufacturing base the Department seeks to protect.

POLICY RECOMMENDATIONS

To maintain and grow domestic production capacity while ensuring supply chain resilience, NJBIA recommends the following policy principles:

1) Avoid Broad or Indiscriminate Tariffs

Tariffs on essential inputs or components used in medical manufacturing could inadvertently harm U.S. producers and disrupt patient access to critical products. The Department should narrowly target any trade measures to address specific vulnerabilities without penalizing compliant U.S. manufacturers.

2) Promote Incentives Over Penalties

Federal policy should focus on positive, market-based incentives that strengthen domestic manufacturing such as in the new law supported by the Trump Administration – the One Big Beautiful Bill (OBBB). Domestic manufacturing incentives can include:

- Investment and equipment tax credits for advanced manufacturing facilities;
- Grants to expand biomanufacturing and medical device production capacity;
- R&D incentives for new materials and process innovations; and
- Workforce development initiatives to build the next generation of manufacturing talent.

Along with OBBB, New Jersey's "Next New Jersey Manufacturing Tax Credit" program, enacted in 2025, is an example of a policy designed to make domestic production more competitive without imposing new costs on supply chains.

3) **Support Predictability and Coordination Across Agencies**

Medical manufacturing is highly regulated by multiple federal agencies. Clear and consistent federal guidance—especially regarding trade, customs, and FDA compliance—is critical to maintaining efficient operations, while tariffs that disrupt the typical and already approved supply chain harm the industry. Coordination among Commerce, HHS, and FDA will reduce confusion and delays that could slow production.

4) **Strengthen Domestic Infrastructure and Logistics**

Supply chain resilience also depends on infrastructure. New Jersey's ports handle **nearly \$100 billion in trade annually**, including critical raw materials and finished medical goods. Investments in port modernization, transportation networks, and domestic logistics capacity will help keep U.S. manufacturing globally competitive and reliable in emergencies.

5) **Encourage Strategic Reshoring Partnerships**

The Department should promote voluntary public–private partnerships to reshore essential manufacturing while maintaining necessary international connections. Encouraging the co-location of component suppliers near major U.S. medical manufacturing hubs such as New Jersey can improve both resilience and responsiveness.

CONCLUSION

NJBIA and its member companies fully share the Department's goal of safeguarding America's national security by ensuring a robust and reliable domestic medical manufacturing base. The United States must remain capable of producing critical medical equipment, PPE, and consumables within its borders.

However, this goal can only be achieved through balanced policies that **strengthen domestic production while preserving access to the foreign components that make that production possible**. Overly broad tariffs or restrictions risk creating the opposite effect—raising costs, discouraging investment, and weakening supply chains.

New Jersey's manufacturers have long been leaders in medical technology, biopharmaceutical innovation, and advanced production. With the right federal support and a predictable, globally integrated policy framework, they can continue to anchor America's national preparedness and economic security.

NJBIA appreciates the opportunity to provide these comments and is happy to support the Department of Commerce and entire Trump Administration in advancing balanced policies that boost U.S. manufacturing competitiveness and maintain patient access to innovative life-saving products. **The New Jersey business community hopes this Section 232 Investigation leads to a clear rejection of tariffs as the right policy tool for this critical sector to achieve the domestic manufacturing goal on which we all agree.**