May 7, 2025

VIA ELECTRONIC DELIVERY **PUBLIC DOCUMENT**
FR Doc. 2025-06587

Mr. Eric Longnecker
Deputy Assistant Secretary for Technology Security
Bureau of Industry and Security
Department of Commerce
1401 Constitution Ave. NW
Washington, DC 20230

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

The Council of State Bioscience Associations (CSBA) is a coalition of independent state and territory-based non-profit trade associations, each of which advocates for public policies that support responsible development and delivery of innovative life-sustaining and life-saving biotechnology solutions. Convened by the Biotechnology Innovation Organization (BIO), CSBA's collective voice represents the true grassroots network of innovators, researchers, manufacturers, and accelerators across the country. According to a recent industry report, U.S. bioscience industry employment in 2023 reached 2.3 million jobs in more than 149,000 businesses across every state in the U.S. and Puerto Rico. The total economic impact of the bioscience industry on the U.S. economy, as measured by overall output, totaled $3.2 trillion dollars in 2023.[1]

The majority of CSBA's member companies are research-intensive small and large biotechnology companies working on cutting-edge innovations. Most of these are pre-revenue human health companies that take enormous risks to develop the next generation of biomedical breakthroughs. Their pipelines have the potential to benefit millions of patients suffering from diseases for which there are no cures or treatments.

In addition to human health focused biotech firms, our membership also includes start-up companies at the forefront of biotechnology in agriculture, food systems, energy, and biobased manufacturing. Over the past 25 years, these technologies have enabled significant improvements to agronomic practices, leading to measurable and widespread environmental and production

[1] TEConomy/Biotechnology Innovation Organization. (2024). *The U.S. Bioscience Economy: Driving Economic Growth and Opportunity in States and Regions.* https://www.bio.org/csba-resources-and-reports

benefits and the development of biofuels, plant bio stimulants, biobased pesticides, recycled carbon biobased products, and gene edited plants, animals, and microbes.

To protect national security, we must treat biotechnology as both a driver of economic growth and a pillar of U.S. strategic strength. CSBA urges the administration to partner with the biotech industry on a focused strategy that expands domestic capacity while preserving the global partnerships that have enabled life-saving innovations. With smart policy, strong public-private collaboration, and steady investment, we can secure the biotech supply chain, ensure continued patient access to critical therapies, and maintain U.S. leadership in the life sciences.

As such, the CSBA Board of Directors writes to endorse BIO's formal submission in response to the Department of Commerce's request for comments on the Section 232 national security investigation of imports of pharmaceuticals and pharmaceutical ingredients.

We look forward to continuing to work with the Administration to chart a path forward that enhances our national resilience while keeping America at the forefront of scientific progress. Should you have any questions, please contact CSBA Executive Director, Patrick Plues at pplues@bio.org.

Sincerely,

Patrick Plues
Executive Director, Council of State Bioscience Associations
Sr. Vice President, State Government Affairs & Affiliate Relations
Biotechnology Innovation Organization

John Conrad
Chair, Council of State Bioscience Associations
Illinois Biotechnology Innovation Organization

Mike Guerra
Vice Chair, Council of State Bioscience Associations
CEO, California Life Sciences

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