ALLIANCE OF
WOUND CARE
STAKEHOLDERS
POWER THROUGH COLLECTIVE ADVOCACY

October 17, 2025

Julia A. Khersonsky
Deputy Assistant Secretary for Strategic Trade
Office of Strategic Industries and Economic Security
Bureau of Industry and Security
U.S. Department of Commerce
1401 Constitution Ave NW
Washington, DC 20230

Re: Section 232 National Security Investigation of Imports of Personal Protective Equipment, Medical Consumables, and Medical Equipment, Including Devices (Docket BIS 2025-0258)

Submitted Electronically via regulations.gov

Dear Deputy Assistant Secretary Khersonsky:

On behalf of the Alliance of Wound Care Stakeholders ("Alliance"), Chair Dr. Matthew G. Garoufalis, Vice Chair Kara Couch, and I appreciate the opportunity to share our perspective on the Department of Commerce's initiation of a Section 232 into the importation of medical devices and their alleged threat to national security.

The Alliance is a nonprofit multidisciplinary trade association representing physician specialty societies, clinical and patient associations, wound care provider groups, wound care clinics, and business entities operating in the field of wound care. Our mission is to promote evidence-based quality care and access to products and services for people with chronic wounds through effective advocacy and educational outreach in the regulatory, legislative, and public arenas.

The Alliance is deeply committed to promoting quality wound care and protecting access to medical products and services for people with wounds which would be significantly at risk should tariffs or quotas be issued - including our veterans receiving care in the VA medical system. As such, the Alliance strongly recommends exclusion of medical equipment, supplies and devices from any Section 232 actions. Wound care is time sensitive and resource intensive. The successful treatment of complex wounds often relies on advanced dressings, biologics, and other specialized products, many of which are sourced globally. Limiting access to these materials through tariffs or import restrictions would directly jeopardize patient outcomes and strain already overburdened clinical systems.

Section 232 is designed to protect national security interests. In the context of medical imports, however, this approach can have the unintended consequence of compromising public health. If wound care providers are forced to use less effective products due to supply disruptions or face

cost increases caused by trade restrictions, patients will suffer. This includes patients with diabetic foot ulcers, pressure injuries, venous leg ulcers, burns, and post-surgical wounds - all of which require precise and often customized interventions. Tariffs would increase the costs of wound care supplies and treatments, making it harder for patients to afford lifesaving care. Some patients could refuse essential wound care treatments due to higher costs, resulting in worse health outcomes, higher rates of amputation and preventable deaths.

We support the Administration's commitment to strengthening domestic manufacturing and supply chain resilience, and we urge the Administration to retain Chapter 98 provisions in any forthcoming Section 232 order affecting medical devices. Maintaining Chapter 98 provisions advances that goal by keeping the U.S. medical technology sector globally competitive and ensuring patient access to the wound care treatments and diagnostics they depend on. Removing these long-standing exclusions would undermine innovation and ultimately harm patient care.

The imposition of broad tariffs on medical technology products could severely undermine the resilience and responsiveness of the U.S. healthcare system and reduce innovation as many U.S. medical technology companies depend on the cross-border flow of parts, specialized tools, and materials.

From a clinical and ethical standpoint, ensuring access to the most effective and appropriate wound care products is not only a matter of providing quality healthcare it could be a matter of life and death. Any policy that risks undermining access to quality care, even indirectly, should be considered with extreme caution.

The Alliance urges the Department to carefully weigh the real-world consequences that Section 232 actions may have on healthcare providers and, more importantly, the vulnerable patients we serve. Preserving access to high-quality medical products is vital to national health security and should not be compromised. We encourage the U.S. Department of Commerce to protect patient access to critical wound care products and technologies and exempt medical products, equipment, and devices from tariffs.

Sincerely,

Sincerely,

Matthew G. Garoufalis, DPM, FASPS, FACFAOM, CWS
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