Response to U.S. Trade Representative (USTR)'s solicitation for input on proposed new and increased tariffs on medical supplies from China

ECRI and the Institute for Safe Medication Practices (ISMP) urge the Office of the United States Trade Representative (USTR) to carefully consider potential adverse impacts of trade policy on patient safety as it relates to pharmaceuticals, medical devices, and healthcare supplies.

About ECRI & ISMP

ECRI is a nonprofit organization dedicated to improving the safety, quality, and cost-effectiveness of care across all healthcare settings. Founded in 1968, ECRI conducts research and provides evidence-based solutions and guidance to healthcare organizations, government agencies, and other stakeholders. ECRI is recognized globally for its contributions to healthcare improvement and is often cited as an authoritative source in matters related to patient safety and healthcare technology.

ISMP is a nonprofit organization dedicated to preventing medication errors and improving medication safety. ISMP provides education, consulting, and research to healthcare professionals and organizations to promote safe medication practices. ISMP is known for their work in developing guidelines, best practices, and tools to enhance patient safety related to medication use. ISMP is a wholly owned subsidiary of ECRI.

Patient Safety & Supply Implications

ECRI and ISMP have emphasized that patient safety and the uninterrupted supply of health-related products must be prioritized in any policy discussions about trade restrictions and tariffs. ECRI and ISMP's stance highlights the critical need to ensure the availability of medical products, such as syringes and their accessories, personal protective equipment, and other essential medical supplies. Any actions that could have detrimental effects on patient care and the safety of patients and healthcare providers should be reconsidered or modified.

For example, a tariff increase of 50 percent has been proposed on "syringes and needles" imported from China, effective August 1, 2024. This is an overly broad category because in healthcare there are many types of needles (e.g. hypodermic, spinal, Verres, and suture) and syringes with specific applications and special connectors to ensure patient and provider safety.

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An example of a special connector is a small-bore connector for enteral applications (EnFit connectors). Enteral syringes are primarily used to provide nutrition and medication to newborns in hospital NICUs. Virtually all these EnFit syringes and connectors are exclusively produced in China and represent a small percentage of all syringe types used in the U.S.

Additionally, significant medication safety implications exist when oral and EnFit syringes are unavailable for preparation and administration of oral liquid medications. EnFit syringes reduce the risk of misconnection by ensuring only enteral devices can connect to each other. The unavailability of these and other syringes can have fatal consequences.

ECRI and ISMP urge the USTR to carefully consider potential adverse impacts its trade policies could have on healthcare workers and patients, particularly vulnerable U.S. neonatal/NICU populations, and the likelihood of significant disruption to enteral syringe and connector supply.

ECRI and ISMP's position underscores the importance of balancing trade policies with the need to maintain a stable supply of critical health products to safeguard public health and ensure that patient care is not compromised.

ECRI and ISMP advocate for a careful review and possible exemptions for essential medical products to mitigate any negative impacts on healthcare delivery.

For More Information

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