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Department of Commerce
Bureau of Industry and Security
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Reference: Comments of the Government of Costa Rica on the Notice of Request for Public Comments on Section 232 National Security Investigation of Imports of Personal Protective Equipment, Medical Consumables, and Medical Equipment, Including Devices.

The Government of Costa Rica appreciates the opportunity to provide the following comments in response to the U.S. Department of Commerce (“Commerce”) request regarding the Section 232 investigation on PPE, Medical Consumables, and Medical Equipment, Including Devices, initiated on September 2, 2025. We respectfully request that the following information be taken into consideration, as it is regarded as highly valuable for the objectives pursued through this investigation; and accordingly consider our exports for tailored treatment under any resulting trade measures, based on the following arguments:

1. Contribution to Making America Healthy Again Through Trusted Partnerships

Costa Rica’s exports of the products under investigation strengthen—rather than threaten—U.S. national security. The imposition of tariffs or measures under Section 232 of the Trade Expansion Act on imports of PPE, medical consumables, and medical devices from Costa Rica would undermine U.S. national security.

Costa Rica’s medical device exports ensure reliable access to critical healthcare products, contribute to supply chain resilience, and originate from an allied regional partner that strengthens U.S. national security. Ensuring continued access to these products supports the Administration’s policy of “Making America Healthy Again” by fostering the conditions needed to protect the health of the U.S. population and reduce healthcare costs for patients.

To achieve these objectives and protect both national and regional security, it is essential to preserve trade in critical medical products with trusted countries in the Western Hemisphere, such as Costa Rica.

Fostering the conditions needed to protect the health of the U.S. population by relying on trusted, geographically proximate suppliers to ensure timely and secure access to critical medical products. Strengthening partnerships with trusted countries and suppliers is critical to prevent, detect, assess, prepare for, mitigate, respond to, and recover from health security threats. Safeguarding access to medical devices at reasonable prices for



both patients and providers ensures availability, stabilizes the supply chain, and enhances national health security.

A resilient supply system built with key partners protects the United States against the threats posed by new pandemics and infectious diseases, which can significantly impact public health, the economy, and social stability. A robust, trusted, and secure supply chain also fosters a more competitive Western Hemisphere at a time when lower-cost products from other regions are entering global markets.

Furthermore, Costa Rica's geographic proximity allows for short lead times and agile logistics, reducing dependence on distant supply routes and enabling rapid responses to surges in U.S. demand. Its resilience during international health crises is reinforced by free trade access to the U.S. market, full protection of intellectual property rights, strong regulatory alignment, and a stable legal and business framework that supports U.S. companies' operations.

The major benefits of importing medical devices from a trusted and reliable regional partner were clearly demonstrated during the COVID-19 pandemic, when manufacturers maintained consistent production and shipments even as many global supply chains were disrupted.

Indeed, Costa Rica has proven to be a reliable and high-performing medical device manufacturing hub. During the COVID-19 pandemic, Costa Rican companies maintained uninterrupted production and export activities, supported by a well-established industrial base, strong institutional coordination, and regulatory compliance equivalent to U.S. standards.

Beyond maintaining operations, Costa Rica demonstrated the ability to increase production to meet urgent global and U.S. demand, expanding the output of essential medical products when they were most needed. Official export data shows that shipments of medical devices not only persisted but increased, with exports to the U.S. growing by 39% between 2020 and 2021.

Adherence to International and U.S. Quality Standards. Costa Rica's medical device industry strictly follows international quality and safety standards, including ISO certifications and U.S. FDA regulations where applicable. This ensures that all products exported to the United States meet rigorous safety, performance, and reliability requirements. Compliance with these standards reduces the risk of product recalls, supply disruptions, and patient harm, providing U.S. healthcare providers with confidence in the consistency and effectiveness of essential medical devices. By maintaining high-quality production, Costa Rica contributes directly to safeguarding public health and supporting the U.S. healthcare system.



Stable Political and Regulatory Environment. Costa Rica's stable democracy, transparent legal system, and predictable regulatory framework minimize risks commonly associated with international supply chains. In times of global uncertainty or geopolitical tension, Costa Rica's political stability ensures continuity of supply, reduces exposure to sudden regulatory changes, and mitigates the risk of disruptions that could affect the availability of critical healthcare products in the United States.

This historic record of partnership demonstrates Costa Rica's proven contribution to safeguarding U.S. national and regional security. Its proximity, logistical connectivity, regulatory compatibility, and industrial reliability make it a strategic partner for nearshoring and hemispheric supply chain continuity. Throughout the pandemic and other global disruptions, Costa Rica maintained consistent supply flows to U.S. hospitals and distributors when other supply chains faltered.

Costa Rica is not a vulnerability but a pillar of resilience in the U.S. medical supply chain—a core component of national security aligned with the objectives of Section 232. The medical device sector in Costa Rica strengthens hemispheric supply continuity and is consistent with the Administration's economic and national security objectives. Imposing tariffs or other measures under Section 232 would increase healthcare costs, and delay the delivery of life-saving products, directly undermining U.S. security and welfare.

2. Enhancing the U.S. industry competitiveness

The U.S. continues to lead the global medical devices industry, propelled by rapid technological innovation, demographic shifts, and a growing emphasis on preventive and precision healthcare. Within this dynamic landscape, Costa Rica's medical devices ecosystem operates under a complementary business model in which R&D activities remain based in the U.S. In this dynamic, Costa Rica serves as an efficient and reliable platform that enables U.S. companies to reinvest savings into R&D and innovation at their headquarters, thereby strengthening their global competitiveness and technological leadership.

According to AdvaMed, 70% of the medical technologies that fill hospitals and clinics across the U.S. are **Made in America**, a share that continues to expand. Costa Rica functions as one of the main strategic allies for the remaining 30%, offering FDA-compliant production that complements and reinforces the U.S. industrial base.

Furthermore, U.S. companies established in Costa Rica enhance their competitiveness in international markets by taking advantage of the robust platform of free trade agreements that the country has in place. These companies export more than two billion (US\$ 2.2 billion) under preferential conditions, to destinations such as the Netherlands, Belgium, Ireland, Canada, and the United Kingdom, among others, further consolidating the U.S.'s leadership in the global industry.



In sum, Costa Rica serves as a critical enabler of U.S. industrial competitiveness that empowers American companies to innovate, expand internationally, and maintain technological leadership in the rapidly evolving global medical devices market.

3. Strengthen U.S. supply chain resilience and reduce dependence on distant suppliers

The medical device manufacturing ecosystem built in Costa Rica has been serving, over the past three decades, the needs of the U.S. healthcare industry. Through strategic policy choices and the consolidation of a specialized industrial cluster, Costa Rica is currently the **fifth-largest supplier** of medical devices and equipment to the U.S. market (Trademap).

Today, medical devices companies operating in Costa Rica are serving the American market through state-of-the-art manufacturing facilities that comply with the highest FDA and international standards. As noted above, these efforts complement the activities of the U.S. industry.

This symbiotic relationship and ecosystem play a strategic role in supporting the U.S. value chain by offering reliability, quality, and geographic proximity. In doing so, Costa Rica plays a valuable role in reducing the risks and vulnerabilities of dependence or reliance on distant suppliers.

At the core of this dynamic lies a complementary production system where most inputs originate in the United States and are transformed locally in Costa Rica.

This proven record demonstrates that Costa Rica's medical device ecosystem effectively complements the efforts of the U.S. industry in the U.S. market. It enables the United States to rely on a trusted, close-to-home, and secure partner in the Western Hemisphere. This strong production platform reinforces the reliability and stability of U.S. medical technology supply chains, while also supporting the safety, efficiency, and competitiveness of its healthcare system.

Final remarks

In light of the above, the Government of Costa Rica respectfully underscores that its medical device exports are a demonstrable pillar of U.S. national and regional security. Costa Rica has consistently proven to be a reliable, high-performing partner that strengthens the resilience, efficiency, and technological competitiveness of the U.S. medical device industry.

Costa Rica's adherence to rigorous international and U.S. regulatory standards, together with its stable political and legal framework, ensures that U.S. companies can operate efficiently and maintain high-quality production. These attributes directly support the Administration's policy objectives of "Making America Healthy Again," safeguarding public



health, lowering healthcare costs, and ensuring the continuous availability of life-saving medical devices.

Moreover, Costa Rica's geographic proximity and integrated manufacturing ecosystem reduce reliance on distant, higher-risk suppliers, enhancing U.S. supply chain resilience. By enabling U.S. firms to focus domestic resources on research, development, and innovation, the current supply chain structure strengthens American technological leadership in a globally competitive market, reinforces hemispheric supply continuity, and supports the expansion of U.S. exports worldwide.

Costa Rica's historic record of collaboration, rapid responsiveness during crises such as the COVID-19 pandemic, and alignment with U.S. strategic interests demonstrate that it is not a vulnerability but a strategic asset.

Furthermore, Costa Rica and the United States share a longstanding and mutually beneficial trade relationship, firmly grounded in the commitments and opportunities established under the CAFTA-DR Agreement. This framework has not only strengthened bilateral trade flows, but also enhanced competitiveness and deepened economic integration between both nations.

Given this fact and the evidence submitted, Costa Rica respectfully requests that its exports of PPE, medical consumables, and medical devices be considered for a tariff free treatment under or exception from any measure arising from this Section 232 investigation.

Sincerely,

Manuel Tovar

Minister of Foreign Trade of Costa Rica

