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From: Broydrick & Associates  
Date: January 20th, 2026  
Re: Section 232 Investigation - Rubber Gloves

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On September 2nd, 2025, the Secretary of Commerce initiated an investigation to determine the effects on national security of imports of personal protective equipment under Section 232 of the Trade Expansion Act. Broydrick & Associates represents the Malaysian Rubber Council. We are writing to you to reaffirm our interests in the proposed rulemaking and the synonymous goals of the Malaysian Rubber Council and the Administration's goals of protecting America's supply chain and national security.

In submitting comments, many organizations expressed views supporting the position that the United States should not impose restrictions on the medical rubber glove industry because of the successful working relationships between Malaysia and the United States as well as the lack of ability or necessity to restrict the trade. The Malaysian Rubber Council shares this opinion and looks forward to continuing to support the American medical and economic interests.

The Secretary outlined, in the request for comment, twelve different criteria to be considered specifically addressing concerns about the possibility of domestic production as well as concerns about foreign interference or manipulation in the supply chain. We are writing to reiterate that Malaysia has operated in good faith trade with the United States and that the medical rubber glove industry should be excluded from the Section 232 investigation.

### **Scope of Investigation and Emphasis on Medical Devices and Equipment**

The current investigation covers a wide range of medical supplies including PPE, medical consumables, and medical equipment. The priorities outlined in the application and the goals of the administration are best served by steering the investigation toward high-grade medical equipment and devices.

First, American manufacturing infrastructure has a greater capacity to develop durable and complex machinery competitively than single-use medical consumables like gloves. For example in the COVID-19 pandemic, American manufacturing successfully shifted auto assembly lines to creating ventilation systems in a short time frame. The assembly line and

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101 Constitution Ave NW, Suite E 825, Washington, DC 20001 (o) 202/637-0637 [www.broydrick.com](http://www.broydrick.com)

manufacturing expertise of American factories is better equipped for the complex nature of machine development than for high-capacity, expeditious production for low cost disposable medical equipment. With infrastructure already in place, technologically advanced development would be more feasible and worthwhile for reshoring.

Second, a focus of American development on medical equipment and machinery provides for higher paying jobs that align with the administration's priorities of reshoring American manufacturing. The administration's priorities of advancing vocational education and ensuring quality employment are best served by the medical equipment and device industries. These industries have less volatility and higher entry costs for foreign markets to enter guaranteeing that American investment will remain stable longer than more volatile industries like disposable protective equipment.

Additionally, natural resources like rubber and cheap raw materials like plastic can be produced at higher margins in foreign markets. The cost of shipping raw materials to the United States for manufacturing makes margins unsustainable for potential American production without substantial and continuous government subsidization. Particularly where America has reliant and cooperative trading relationships with allies like Malaysia, emphasis should be placed on securing markets where trade alliances do not exist or lack the necessary stability. Where medical devices and high-tech equipment require complicated manufacturing processes that cannot be replicated in cheap foreign markets, disposable medical supplies like gloves and plastics do not provide the necessary margins for profitable production after accounting for raw material import costs.

The following sections outline the key relationship Malaysia and the United States operate in securing global medical glove production. *Because of this ongoing and fruitful relationship, we are adamant that the scope of the Section 232 investigation is better served in targeting industries, like complex medical equipment, that provides better opportunity for American manufacturing to flourish.*

### **Malaysian Rubber Glove Relationship with America**

44% of medical-grade rubber gloves imported into the United States currently derive from Malaysia. This percentage has remained steady despite fluctuating demand demonstrating the committed stability Malaysia has toward the United States. Further, Malaysia fulfilled nearly two-thirds of American emergency glove orders during the Covid-19 pandemic and leading Malaysian manufacturers already have FDA501(k)clearances to produce medical-grade gloves. In sum, Malaysia has shown that it has a beneficial and consistent trading relationship with the United States. Imposing tariffs in the interest of national security is not only unnecessary but counterproductive to an already efficient and productive market.

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### **United States Demand and Inadequate Production Capabilities**

The United States cannot domestically meet the necessary demand for medical-grade gloves. The American healthcare system requires an annual production of 100 billion rubber gloves whereas domestic production capacity can only accommodate a demand of 10 billion leaving the United States with a trade deficit of 90 billion gloves. While certainly impractical to increase production tenfold within a short time frame<sup>1</sup>, the United States is also incapable of producing gloves at a competitive price. Malaysia benefits from proximity to natural rubber, mature and efficient supply chains, and a lack of government-backed subsidies undermining the global market. Simply put, the United States cannot reasonably create or maintain a domestic supply chain that comes close to meeting increasing demands.

### **Benefits of Malaysian-American Rubber Glove Trade**

The United States's partnership with Malaysia has successfully acted as a deterrent from malicious actors, like China, attempting to infiltrate and undermine the global market. China has used government subsidies to bolster their rubber glove industry in an attempt to artificially lower global prices to a point of insolvency for competing countries. Through the free flow of trade between Malaysia and the United States, rubber glove prices have remained stable through fluctuating waves of supply and demand. While a Section 232 investigation into Chinese exports may be worthwhile, investigations into reliable trading partners does nothing more than undermine the confidence of the trading relationship and reinforce Chinese market manipulation attempts by destabilizing global prices.

Further, a free trading relationship between the Malaysian rubber glove industry and United States healthcare partners ensures that the cost of healthcare remains low. The continued relationship further creates efficiency in the supply chain for American consumers and prevents depletion of the United States's emergency stockpile.

### **Conclusion**

America and Malaysia have created a mutually beneficial relationship in the rubber glove industry. The Secretary of Commerce would be supporting the American economy and people by ending the Section 232 investigation into medical-grade rubber gloves, continuing to promote the strong and balanced trade relationship these countries currently enjoy, and directing the investigation's focus toward complex medical equipment and devices.

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<sup>1</sup> It is estimated by the Malaysian Rubber Glove Manufacturers Association that the most optimistic possibility of US production would take 24-36 months to initiate. We contend that red tape and industry investment would make this timeline unlikely.