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Additional information is available at the Department of Justice, Washington, D.C.



From: Broydrick & Associates

Date: February 7, 2026

Re: Section 232 Investigation - Rubber Gloves

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.

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 frame¹, 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 and continuing to promote the strong and balanced trade relationship the countries currently enjoy.

¹It 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.

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