

March 4, 2025

The Honorable Donald J. Trump President of the United States White House 1600 Pennsylvania Avenue Washington, DC 20500

Re: Allied Position of the Dental Trade Alliance, the American Dental Association and the National Association of Dental Laboratories Regarding the Economic Impact of Increased Duties on the Dental Industries and the Oral Health Community

Dear President Trump:

The Dental Trade Alliance ("DTA"), the American Dental Association ("ADA") and the National Association of Dental Laboratories ("NADL")¹ support President Trump's goal of boosting the U.S. economy. The widespread use of tariffs, however, jeopardizes the availability of key dental and other medical devices, and other supplies, that are essential to the provision of dental care in the U.S. For this reason, the DTA, ADA and NADL respectfully requests that the administration exclude medical devices and other key supplies, used by the American dental industry, from any additional duties, and roll back those additional duties already being assessed on, medical devices used by the U.S. dental industry.

Currently, many dental products and accessories, including raw materials, tools, instruments and equipment used in dental practices and laboratories ("Dental Equipment"), are subject to the existing China Section 301 duties and the recently imposed additional ten percent duties on Chinese origin merchandise. Furthermore, Dental Equipment produced in the United States from foreign origin steel or aluminum will now become more expensive as the tariffs assessed on those raw materials filter down through the supply chain. Lastly, the contemplated twenty-five percent duties on Mexican and Canadian origin Dental Equipment, and any possible reciprocal tariffs on foreign origin Dental Equipment, will cause economic consequences felt first by DTA members, as the initial importers or producers of the Dental Equipment, then by dentists, oral surgeons, emergency room physicians, commercial dental laboratories and other oral health professionals as those costs are passed on, and eventually to consumers, who will see cost for oral health care increase to offset the duties being assessed on these FDA regulated medical devices.

¹ The DTA is a member supported trade association, consisting of suppliers and service providers to the oral health profession. DTA members manufacture and distribute essential, and in some cases life-supporting, medical devices and dental products, including personal protective equipment for fighting the COVID-19 pandemic. The ADA, with approximately 159,000+ members, is the leading advocate for dentistry in the U.S. Its mission is to help dentists succeed and to support the advancement of oral healthcare in the U.S. The leading trade association for the dental laboratory industry, the NADL represents commercial dental laboratories that serve the dental profession as they fulfill their integral role in the deliverance of oral healthcare.

The DTA members who are importing the Dental Equipment, as well as the dental professionals in the ADA and NADL who purchase and use them, are U.S. companies and U.S. professional practices, often small businesses. They employ U.S. citizens in good paying jobs, with benefits. These associations, however, believe that lost business, reduced staff, delayed business expansion and possible discontinuation of some product lines of medical devices will result from wide use of tariffs. This will result in increased cost of care, which will ultimately be on to the patient.

In turn, these increased costs will negatively impact oral health in the U.S. Higher dental costs result in fewer patients seeking care. Thus, patients, already confronted with ever increasing health costs for non-tariff reasons, will ultimately experience greater out-of-pocket costs because these additional duties are now being assessed on dental medical devices and other imported dental materials, tools and equipment, which costs then get absorbed into the patient's bill.

Furthermore, by delaying routine oral health exams because of rising costs, patients increase the risk that other, more serious oral conditions and diseases will go undetected. Thus, the economic burden imposed by extra duties on dental medical devices, as passed on to health care providers and then to their patients, ties to a negative public health impact in the U.S. when U.S. citizens skip trips to the dentist because of cost.

Thank you for the opportunity to raise this important issue to your attention. Please contact us via email should you have questions regarding this request.

Sincerely,

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