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The Vision Council Advocates Against Expanded Tariffs on Optical Products and Manufacturing Equipment

Alexandria, VA – October 29, 2025 – The Vision Council, the national trade association representing manufacturers, suppliers, and retailers in the optical industry, has submitted formal comments to the U.S. Department of Commerce in response to two ongoing *Section 232* national security investigations that could lead to new tariffs on key products used by the optical industry.

The two submissions address the Department's investigations into: **Personal Protective Equipment (PPE), medical consumables, and medical equipment** ([Docket No. BIS-2025-0258](#)), and **Robotics and industrial machinery** ([Docket No. BIS-2025-0257](#)), broad product definitions that could include spectacle lenses, frames, diagnostic instruments, and the machinery used to manufacture them.

In its comments, The Vision Council argued that imposing additional tariffs on these essential optical products and machinery would directly harm public health by raising costs for patients and providers. The submissions urge the Department to exclude optical products and related manufacturing equipment from any new tariff actions and to recognize that these goods support, rather than threaten, U.S. health and economic security.

Protecting Vision Health and Access to Care

In its filings, The Vision Council emphasized that optical medical devices, such as eyeglasses, contact lenses, and low vision aids, are among the most widely used medical devices in the United States. Approximately 61% of Americans wear prescription eyeglasses, and over 81 million pairs of lenses are dispensed annually. Additional tariffs on these devices would raise prices across the optical supply chain, limiting access to essential vision care—particularly for children, veterans, and other vulnerable populations.

“Affordable access to corrective eyewear is a public health necessity,” said **Ashley Mills, CEO of The Vision Council**. “Additional duties on optical devices or equipment will make it harder for Americans to access the care they need.”

The Vision Council's comments also highlighted the negative economic impact of existing trade measures, such as Section 301 tariffs and duties imposed under the International Emergency Economic Powers Act. Due to these tariffs, many optical companies already face higher costs, reduced margins, and delayed expansion.

The Vision Council also underscored that the optical industry's supply chains, spanning reliable trade partners such as Italy, Germany, Japan, and Mexico, pose no threat to U.S. national security and are primarily focused on consumer health and vision care.

Both comments urged the Department of Commerce to establish a broad and transparent exclusion process for optical products and related equipment. The Vision Council provided comprehensive lists of Harmonized Tariff Schedule (HTS) codes identifying optical devices, diagnostic instruments, and eyewear manufacturing machinery that should be exempt from any Section 232 measures.

Continued Advocacy on Capitol Hill

Beyond these formal submissions, The Vision Council's Government and Regulatory Affairs team continues to engage with members of Congress and federal agencies in Washington, D.C., to advocate for tariff relief and to emphasize the impact of current duties on the vision care industry.

"Our mission is to ensure policymakers understand that optical products are health tools, not security threats," said **Omar Elkhatib, Senior Manager of Government Relations**. "Tariff relief is essential to maintaining affordable, high-quality vision care for millions of Americans."

To learn more and get involved, visit thevisioncouncil.org.

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About The Vision Council

The Vision Council brings the power of sight to all through education, government relations, research, and technical standards. A leading advocate for the optical industry, the association positions its members to deliver the eyewear and eyecare people need to look and feel their best. Vital to health, independence and safety, better vision leads to better lives.