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September 17, 2026

Secretary of State Marco Rubio
1600 Pennsylvania Avenue, NW
Washington, DC 20500

Dear Secretary Rubio:

We, the Attorneys General of Alabama and 19 other States, would first like to acknowledge the important work the National Security Council and the Administration are doing to strengthen the resilience of America's pharmaceutical supply chains. The President's August 2025 Executive Order on the Strategic Active Pharmaceutical Ingredients Reserve rightly recognizes that active pharmaceutical ingredients are not merely a health-care input, but a strategic national-security vulnerability.¹ The White House has noted that only about 10 percent of APIs by volume for finished drug products used in the United States are made domestically, and that foreign concentration in key starting materials and APIs can implicate the health and security interests of the nation.² Our reliance on China, in particular, for medicines is a longstanding concern that must be rectified.

Second, we write to bring to your attention an emerging threat that fits squarely within that concern: Chinese-sourced active pharmaceutical ingredients used in compounded GLP-1 drugs, including semaglutide, tirzepatide, and retatrutide.³ Not only are these knock-off drugs bypassing our nation's safeguards, but there are also concerns of potential ties to Chinese entities manufacturing fentanyl.

The FDA has created a new vulnerability in this already fragile supply chain by giving Chinese suppliers a green light to ship unapproved, knock-off product to America without detention or inspection. This was done through the creation of a Green List (FDA Import Alert 66-80), issued in September 2025.⁴ If the government cannot verify the true

¹ Ensuring American Pharmaceutical Supply Chain Resilience by Filling the Strategic Active Pharmaceutical Ingredients Reserve, 90 Fed. Reg. 40,223 (Aug. 13, 2025).

² *Id.*

³ Retatrutide is currently in Phase 3 clinical trials and has not yet been approved by the FDA.

⁴ U.S. Food & Drug Admin., Import Alert 66-80, *Detention Without Physical Examination of Glucagon-Like Peptide-1 (GLP-1) Receptor Agonist Bulk Drug Substances* (Aug. 21, 2026), https://www.accessdata.fda.gov/CMS/IA/importalert_1186.html

source, chain of custody, and downstream use of these ingredients in real time, a Green List can quickly become a laundering channel rather than a safeguard.

That concern is no longer hypothetical. The FDA recently issued a warning letter to Harbin Jixianglong Biotech Co., Ltd. (“Harbin”), a Chinese company, after an on-site inspection months after Harbin’s Green List placement found that Harbin had purchased knock-off semaglutide API from a non-Green List facility that isn’t registered with the FDA, repackaged and relabeled it under Harbin’s name, changed manufacturing and retest dates, and distributed the API to the United States.⁵ Because Harbin was on the Green List, none of these shipments had been detained or inspected at the border while in transit; the scheme only came to light once FDA inspectors were on-site at the facility itself. In plain terms, a Chinese company that had the benefit of a trusted pathway allegedly used that position to obscure the true source of an injectable drug ingredient entering the American market, and the breach was caught by inspection, not by the Green List’s border safeguards. This follows the same pattern as the Heparin crisis nearly 20 years ago that killed or harmed many Americans.⁶

Recent reporting adds to the concern. Axios reported that Chinese manufacturers associated with fentanyl precursor supply chains are finding a new U.S. market in peptides, including cosmetic and weight-loss peptides, with blockchain-analysis firms identifying crypto-linked payments from U.S. peptide sales flowing to China-based chemical manufacturers.⁷ The same reporting noted that some firms previously associated with fentanyl precursor activity are now selling cosmetic and weight-loss peptides.⁸

That raises a direct national-security question: if entities connected to fentanyl precursor markets are moving into peptides, how do we know this does not include GLP-1 ingredients, GLP-1-adjacent peptides, or key starting materials into the American compounding market?

⁵ Warning Letter from Ctr. for Drug Evaluation & Rsch., U.S. Food & Drug Admin., to Guo Qing Leng, President & Gen. Manager, Harbin Jixianglong Biotech Co., Ltd. (May 1, 2026), <https://www.fda.gov/inspections-compliance-enforcement-and-criminal-investigations/warning-letters/harbin-jixianglong-biotech-co-ltd-723330-05012026>

⁶ Anita Y. Szajek et al., *The US Regulatory and Pharmacopeia Response to the Global Heparin Contamination Crisis*, 34 Nat. Biotechnol. 625 (2016) (“The 2007 heparin contamination crisis resulted in several deaths in the United States and hundreds of adverse reactions worldwide, revealing the vulnerability of a complex global supply chain to sophisticated adulteration.”), <https://pmc.ncbi.nlm.nih.gov/articles/PMC6516469/pdf/nihms-996099.pdf>.

⁷ Tina Reed, *Chinese Fentanyl Makers Find New U.S. Market in Peptides*, Axios (July 7, 2026), <https://www.axios.com/2026/07/07/chinese-fentanyl-makers-pivot-peptides>. (last visited Sept. 15, 2026).

⁸ *Id.*

This is not simply an FDA compliance issue. It implicates foreign chemical networks, illicit finance, customs enforcement, intelligence collection, state consumer protection, and the integrity of injectable medicines used by American citizens. Nor is it enough to assume that a Green List designation protects the public. Harbin shows that the designation itself can be exploited — and that our ability to catch it currently depends on facility inspections after the fact, not real-time verification at the border.

We respectfully ask how the NSC can help ensure that the federal government is treating this as a national-security threat, not merely a drug-regulatory matter, and that state attorneys general are provided with any and all information to ensure collaboration on these matters to protect patients. In particular, we would welcome the opportunity to understand what federal agencies know about foreign GLP-1 and peptide supply chains and their ties to entities involved in fentanyl production, what warning signs state attorneys general should be watching for, and how state and federal partners can better share information before this market gets further out of control.

Our states stand ready to work with the Administration to protect our citizens, strengthen the drug supply, and prevent foreign bad actors from harming Americans.

Respectfully,



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Attorney General of Alabama



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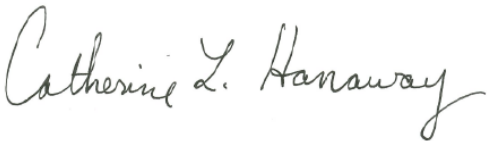
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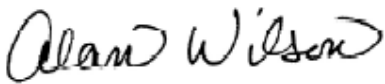
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cc:

The Honorable Robert F. Kennedy, Secretary, Department of Health and Human Services

The Honorable John Moolenaar, Chairman, House Select Committee on the Strategic Competition Between the United States and the Chinese Communist Party

The Honorable Ro Khanna, Ranking Member, House Select Committee on the Strategic Competition Between the United States and the Chinese Communist Party

U.S. Department of State