

**Testimony to the Office of the United States Trade Representative
Re: Strengthening Critical Mineral Supply Chains through the 2026 USMCA Joint Review**

The following remarks are prepared for testimony to be given on December 5, 2025: Request for Public Comments and Notice of Public Hearing Relating to the Operation of the Agreement Between the United States of America, the United Mexican States, and Canada.

I am Dan Giamo, Director of Policy at the Climate Leadership Council. Thank you for this opportunity to testify. The Climate Leadership Council is a nonpartisan organization devoted to identifying and advancing policies that reduce global emissions and strengthen the American economy. I focus my testimony today on recommendations for leveraging the USMCA joint review toward enhanced supply chain security for American firms, specifically those firms along the critical mineral supply chain.

American firms are pioneering advanced energy technologies like next-generation nuclear fission, carbon capture, batteries, electric vehicles, solar, wind, and fusion. To make those technologies at home—and win in the global energy market of the future—firms must have reliable, affordable access to mineral inputs.

At the same time, American mineral producers—including miners, extractors, and processors—require market conditions insulated from manipulation from the Chinese Communist Party to develop a robust domestic critical mineral production capacity. Along with other policy levers, trade agreements, like USMCA, are a key tool in supporting both manufacturers and domestic critical mineral producers.

We commend USTR for its work in establishing frameworks and partnerships that strengthen collective resilience against supply chain disruptions, such as those recently concluded with Australia and Japan. USMCA can build on the successes of these recent partnerships and further bolster critical mineral supply chain security.

Over the past year, the Climate Leadership Council has collaborated with industry stakeholders across the mineral supply chain, including miners and extractors, processors, manufacturers, and investors—as well as with former USMCA negotiators—to develop practical and forward-looking proposals for this review. Our analysis highlights that the complementary economic and geological strengths of the U.S., Mexico, and Canada provide a robust foundation for enhanced cooperation that will result in tangible benefits to the U.S.

We encourage USTR to propose targeted updates to the agreement to expand and secure North American supply chains.

Specifically, we suggest the following four areas of focus:

1. **Enhance supply chain transparency** to support informed decision-making by industry and policymakers. Given the complexity of these supply chains, it is difficult to pinpoint vulnerabilities and respond effectively to market manipulation. Our partnership with Canada and Mexico offers an opportunity to strengthen U.S. efforts by extending transparency across our shared, deeply interconnected supply chains. Within the USMCA framework, we can advance this goal through measures such as import licensing and disclosure requirements, updated rules of origin, and tailored treatment for certain foreign entities.
2. **Expand regional extraction and processing capacity** to reduce import dependence and exposure to geopolitical risks. The administration has prioritized strengthening domestic mineral production, and the USMCA can complement this effort by expanding North America's overall capacity and leveraging each country's geological assets and technical strengths. We can advance this goal within the USMCA framework by establishing a regional working group to set shared priorities, streamline regulatory and permitting processes, coordinate economic support, and foster collaboration on research and innovation.
3. **Boost North American competitiveness** to attract greater investment in domestic mining, refining, recycling, and advanced manufacturing. The USMCA framework can offer a regional approach to counter market manipulation. Coordinated measures—such as aligning trade policies, establishing strategic reserves, and considering targeted price supports—allow partners to combine market power, coordinate responses to market manipulation, and create a more stable, competitive environment for North American critical mineral industries.
4. **Engage additional international partners** whose geological or industrial strengths complement those of the USMCA economies. The administration has already highlighted the value of broader cooperation, including through a critical mineral club of nations. By organizing mineral-related provisions as an intergovernmental commodity agreement annex to the USMCA, additional countries could join, partnerships could expand, and the U.S. can develop alternative supply chains faster, at lower cost, and with less market distortion than acting alone.

The United States can leverage the USMCA joint review to build a more robust, transparent, and diversified critical minerals ecosystem that supports innovation, economic growth, and energy security. We look forward to working with USTR to advance these shared goals and ensure the United States leads by securing supply chains to strengthen our industrial base and global competitiveness.