



Mike Davin
Senior Director, Energy and Resources Policy

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June 24, 2026

The Honorable Gary Palmer
Chairman
Subcommittee on Environment
Committee on Energy and Commerce
2125 Rayburn House Office Building
Washington, DC 20515

The Honorable Paul Tonko
Ranking Member
Subcommittee on Environment
Committee on Energy and Commerce
2322 Rayburn House Office Building
Washington, DC 20515

Dear Chairman Palmer and Ranking Member Tonko,

On behalf of the National Association of Manufacturers—the largest manufacturing trade association in the U.S., representing companies of all sizes, in every industrial sector, and in all 50 states—we write to express the NAM’s support for the Subcommittee on Environment’s focus on critical minerals and to submit information for the record ahead of the legislative hearing entitled “Trash to Treasure: Examining Legislation to Support Domestic Critical Mineral Recovery and Recycling.”

The NAM has long advocated for the continued growth of our domestic critical mineral supply chains through permitting reform, strategic incentives, and investments into critical mineral recycling, recovery, and substitution technologies. Manufacturers depend on reliable supply chains to make things in America. Critical minerals and the inputs made using them are necessary to produce technologically advanced industrial and consumer products made in America—including aircraft and defense systems, semiconductors, automotive parts and vehicles, electric grid components, robotics and industrial automation, personal electronics, and much more.

Currently, the U.S. is 100% reliant on foreign supply for 13 critical minerals and over 50% reliant on an additional 20. This did not happen overnight. China’s dominance over critical minerals is the result of decades of industrial strategy, and America requires bold and strategic action to reset this dynamic.

The cost of inaction is too great. Congress should focus its efforts on enacting meaningful reforms to spur innovation and increase our mining, processing, recycling, and recovery capacity. Domestically, policymakers must facilitate the resources manufacturers need to launch projects, streamline the processes to put shovels in the ground through permitting reform and invest in a pipeline of skilled workers to benefit local economies and ensure the long-term growth of the industry.

Internationally, the U.S. must leverage strategic partnerships with allies to rebalance the global mineral market, develop sustainable and diversified sources for critical minerals and advance opportunities and access for manufacturers in the U.S.

Manufacturers consider these efforts to be essential to our comprehensive critical minerals agenda. This is not just a manufacturing issue, but one of national security.

The NAM appreciates the Subcommittee for holding this hearing to discuss multiple pieces of legislation that are focused on finding new ways to recycle, recover, and bolster domestic critical minerals and clean up legacy sites. We look forward to continuing to partner with you and the full Energy and Commerce Committee to ensure that the United States can leverage its domestic critical mineral resources while also strengthening the resilience and reliability of global critical mineral supply chains.

Sincerely,

A handwritten signature in black ink, appearing to read "Mike Davin".

Mike Davin
Senior Director, Energy and Resources Policy

A handwritten signature in black ink, appearing to read "Christopher Phalen".

Christopher Phalen
Vice President, Domestic Policy

Enclosure

A Critical Minerals Strategy for Manufacturers in America

Manufacturers depend on reliable supply chains to make things in America. Critical minerals and the inputs made using them are necessary to produce technologically advanced industrial and consumer products made in America — including aircraft and defense systems, automotive parts and vehicles, electric grid components, robotics and industrial automation, personal electronics, and more.

While endowed with a wide array of natural resources, the U.S. has finite domestic supply of critical minerals and growing, but limited, midstream processing capabilities. Today, the U.S. is at least 50% import reliant for 33 out of 58 critical minerals—including 13 for which the U.S. is 100% dependent on imports.

88%

of manufacturers report that their business would be affected if other countries limited or decreased the supply of critical minerals to manufacturers in the U.S.

*NAM Manufacturers' Outlook Survey
Q4 2023*

China is the world's leading supplier of critical minerals. With processing capacity concentrated in just one nonmarket economy, manufacturers in the U.S. cannot risk exploitation of these supply chain vulnerabilities. The NAM strongly supports the administration's efforts to reshape and rebalance global critical minerals supply chains through comprehensive actions domestically and with international partners.

A two-pronged approach designed to address the needs of the manufacturing sector across the full critical minerals life cycle will enhance capacity at home, leverage resources abroad, and safeguard access to a diverse range of critical minerals necessary for U.S. economic strength and national security.

The U.S. relies entirely on foreign suppliers for **13 out of 58 minerals** critical to American manufacturing.

For another 20 minerals, **foreign imports make up over 50%** of U.S. supply.

A Critical Minerals Strategy for Manufacturers in America

Domestic Policy Solutions

Manufacturing of advanced technologies is poised to surge globally. For manufacturers in the U.S. to maintain competitive advantage, policymakers must deploy legislative, regulatory, and administrative solutions that enhance the sector's access to critical inputs here at home.

- **Enact comprehensive permitting reform legislation to sustain project certainty** through the modernization of the National Environmental Policy Act, the Clean Air Act, and the Clean Water Act, putting an end to the cycle of litigation, unclear timelines, and overhang of uncertainty that threatens billions of dollars in investments in extraction, processing, and refining projects.
- **Restore permanency to strategic incentives like the 45X Advanced Manufacturing Production Credit for critical minerals and facilitate federal support through the Defense Production Act and the Energy Dominance Finance Office** to make it more attractive and less risky to launch extraction and processing projects in the U.S.
- **Invest in critical mineral recycling, recovery, and substitution technologies and critical mineral processing capabilities** through federal tax incentives, grants, and loans for R&D, as well as public-private partnerships. Coordinate efforts with strategically aligned countries to develop and scale mineral technologies and viable substitutes while leveraging advancements in AI and machine learning.
- **Strengthen workforce development programs to close the skills gap**, including building a modern mining workforce through grants and funding to recruit and train students in mining schools in the U.S.

Percentage of Global Production Controlled by China



Source: U.S. Geological Survey, "2026 USGS Mineral Commodity Summaries," February 2026. World Critical Mineral Stats visualization

A Critical Minerals Strategy for Manufacturers in America

International Policy Solutions

Negotiate a plurilateral agreement that positions U.S. investors for success and leverages the collective advantages of international partners and allies at each stage of the critical minerals life cycle, effectively rebalancing the global minerals market.

To generate new pipelines for critical minerals projects and secure diversified access to vital manufacturing inputs sourced globally:

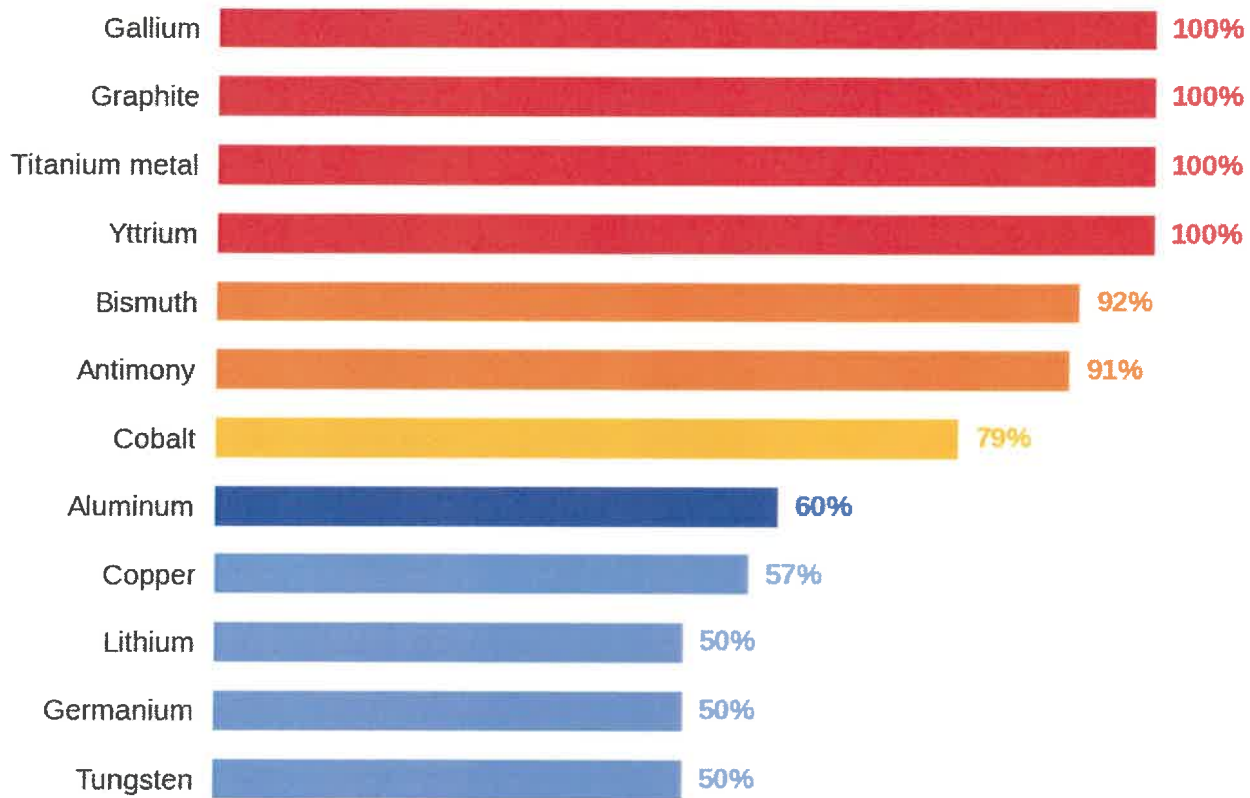
- **Unlock and accelerate catalytic project financing** to help mineral-rich countries convert untapped resources through expanded co-financing with partners, targeted to fill gaps in the risky discovery and development phases of critical minerals projects.
- **Obtain “first rights” commitments, extended operating licenses, and preferential offtake agreements** for U.S. investors.
- **Promote dedicated “Single Windows” to streamline and expedite investment approvals** for overseas mineral projects.
- **Secure strong investor protections and eliminate unfair advantages** by state-owned enterprises from non-market economies.
- **Negotiate zero-for-zero tariff terms** to ensure access to critical minerals and industrial inputs like machinery.
- **Create a mechanism for pooled industry demand** for minerals acutely needed by manufacturers in small quantities.
- **Accelerate innovative R&D for mineral recovery, recycling, and substitutability** through cross-government public-private collaboration.

To address predatory marketplace distortions and supercharge expansion of domestic extracting and processing capacity and the U.S. manufacturing base:

- **Create a minerals information clearinghouse** to counter non-market pricing practices through transparent global data on minerals production, supply, and trade flows.
- **Combat regulatory arbitrage** through alignment of industry-led high standards for transparency, traceability, and sustainability.
- **Address the weaponization of export restrictions** to prevent their use to distort supply and prevent market-based pricing for critical minerals.

A Critical Minerals Strategy for Manufacturers in America

U.S. Import Reliance by Mineral



% of domestic demand dependent on imported sources

U.S. Geological Survey, "Mineral Commodity Summaries 2026," March 2026. Figure 2 - 2025 U.S. net import reliance

