

November 3, 2025

Submitted via the online USTR Portal at <https://comments.ustr.gov/s/>

Daniel Watson
Assistant U.S. Trade Representative for the Western Hemisphere
Office of the United States Trade Representative
600 17th Street, NW
Washington, D.C. 20508

RE: “Request to Appear at the Hearing on the Operation of the Agreement between the United States of America, the United Mexican States, and Canada,” docket number USTR-2025-0005,

Dear Mr. Watson:

The Aluminum Association (the ‘Association’) and its members welcome the opportunity to appear at the Hearing on the Operation of the Agreement between the United States of America, the United Mexican States, and Canada on September 17, 2025. Docket numbers USTR-2025-0004 and USTR 2025-0005.

Please find a draft of the proposed testimony for Charles Johnson, President and CEO of the Aluminum Association below.

**Testimony of Charles Johnson
President & CEO of the Aluminum Association
Hearing on the Operation of the Agreement between the United States of America, the United Mexican States, and Canada
November 17, 2025**

(Approx. 4 minutes)

Good morning.

I’m Charles Johnson, President and CEO of the Aluminum Association — the leading voice for the aluminum industry in the United States. Our association represents more than 120 companies throughout the full industry value chain, including the companies that produce 70% of the aluminum and aluminum products shipped in North America.

For anyone unfamiliar with our metal, aluminum is everywhere—from cans, cars and buildings to fighter jets, tanks, armor and satellites. Our industry is a beacon of American manufacturing, and we’re proud to directly employ more than 164,000 American workers and support an additional half million across the supply chain.

We appreciate the opportunity to participate in today’s hearing as USTR looks to strengthen the U.S.–Mexico–Canada Agreement negotiated during President Trump’s first term. The USMCA

helped to stabilize our industry and encourage more than \$10 billion in new domestic investments, including two new rolling mills for the first time since 1980.

However, unfairly subsidized aluminum from China continues to flow into North America — often entering through Mexico — and undermining that progress. As an example, compared to 2017, imports of Chinese coil into the region have surged by more than 300%, displacing U.S. sales and moving American manufacturing offshore. Chinese exports of subsidized coil to Mexico are up by more than 470% in 2025 compared to 2017. In total, these new subsidized imports are equivalent to the capacity of a major U.S. rolling mill.

Without action, the U.S. risks becoming an “assembly” nation instead of a true manufacturing power. This would have serious consequences for our workforce, communities, and national security.

Luckily, there are several concrete actions USTR and all USMCA parties can take to strengthen aluminum’s competitiveness:

First, Mexico must immediately establish a comprehensive aluminum import monitoring system — as both the U.S. and Canada have done — to track the country of smelt and cast for all aluminum products. This was a 2019 commitment and must be met before any new aluminum discussions proceed.

Second, all three countries must harmonize tariffs and close loopholes that allow non-market economy metal to enter the region duty-free. Tariff harmonization across North America should match the scope and strength of U.S. Section 232 measures, with clear enforcement against evasion.

Third, strengthen the rules of origin. Products containing any Chinese or other non-market aluminum should not qualify for USMCA benefits. The agreement should include clear regional value content requirements and apply to all forms of aluminum — upstream, midstream, and downstream.

Fourth, protect the free flow of aluminum scrap within North America while preventing exports of scrap to non-market economies like China. Scrap is a vital feedstock for new U.S. investments, including the two major rolling mills now being built in Alabama and Mississippi.

Finally, we urge the Administration to use Section 232 authority to address imports of downstream products that incorporate unfairly traded aluminum. This step will prevent circumvention of U.S. antidumping and countervailing duty laws and keep trade in North America truly fair.

In short, a renewed but strengthened USMCA must deliver on its original promise: a level playing field for North American manufacturers and workers. With strong monitoring, harmonized tariffs, and fair rules of origin, we can ensure that the benefits of USMCA flow to the U.S., Canada, and Mexico — not to subsidized producers in China.

Again, we appreciate the opportunity to share our views on this important issue and for your continued support of the American aluminum industry. Thank you for your time.