The Aluminum Association

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 for Public Comment on the Operation of the U.S.-Mexico-Canada Agreement

Dear Mr. Watson:

The Aluminum Association (the 'Association') and its members welcome the opportunity to respond to the Federal Register notice of September 17, 2025 (90 FR 44869) regarding the request for public comment on the operation of the U.S.-Mexico-Canada Agreement (USMCA) in docket numbers USTR-2025-0004 and USTR 2025-0005.

Introduction

The Association is the voice of the aluminum industry in the United States, representing aluminum producing companies and their workers that span the entire aluminum value chain from primary production to value-added products to recycling, as well as suppliers to the industry. Altogether, Association member companies produce 70 percent of the aluminum and aluminum products shipped in North America. The U.S. aluminum industry across the value chain directly employs more than 164,000 union and non-union workers and indirectly supports an additional 536,000 workers. Through its activity, the economic impact of the U.S. aluminum industry adds $228 billion to the economy annually.[1]

[1] The Aluminum Association, The.Economic.Impact.of.the.Industry¿8680.Data.(John Dunham & Associates, 2024) https://aluminum.guerrillaeconomics.net/reports/cf1bd3a8-84b3-4289-99bf-e30092ac5a4c? (accessed October 21, 2025).

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U.S. demand for aluminum products is strong and growing at a 2.5% compound annual rate (CAGR) with a total demand approaching 12 million metric tons in 2024. Semi-fabricated aluminum products rely on input materials, either primary aluminum or secondary/recycled aluminum. On average, primary aluminum makes up 55%, and recycled aluminum makes up 45% of fabrication. Deeply integrated across all three nations, the U.S. relies on imports for 82% of its primary aluminum. Additionally, on average over 90% of the aluminum scrap that the U.S. imports comes from Canada (61%) and Mexico (29.8%).

Since 2013, the aluminum industry has invested over $10 billion in domestic manufacturing. Much of this investment was driven by strong domestic demand from U.S. manufacturers, which can be attributed to strong restrictions on unfairly subsidized Chinese metal.

The U.S. aluminum industry continues to face the acute and persistent issue of unfairly subsidized Chinese aluminum overcapacity. The Chinese smelter base is essentially fully built, having expanded over the past three decades with significant government support and will present an inherent advantage for Chinese aluminum manufacturers for years to come. Therefore, China is the problem, and the United States and its closest trading partners should focus on restricting Chinese metal from entering North America. This should be the primary objective of USMCA as this will help the U.S. aluminum industry grow.

The Aluminum Industry

The aluminum industry is differentiated from other metals, despite often being grouped with the steel industry. Steel and aluminum are fundamentally different metals, with different sources, processing methods, applications, and pricing structures, and should be treated independently from one another. Unlike U.S. steel operations which are typically vertically integrated within a single company, aluminum production is largely disaggregated with three distinct production steps – upstream (bauxite, alumina, primary production/smelting); midstream (secondary production/recycled aluminum, billet, sheet ingot); and downstream (foil, sheet, plate, castings, extrusions).

The U.S. aluminum industry is globally integrated and relies on imports to meet around half of U.S. supply needs. For example, the United States has no commercial bauxite mining for aluminum production, only a single alumina refinery, and only four remaining primary aluminum smelters, which are shackled with globally uncompetitive energy costs. U.S. steel mills are more likely to be self-sufficient and vertically integrated – and more flexible in their manufacturing processes. Steel mills are far less reliant on imported input materials which account for approximately 15% of production.

The most common form of primary aluminum is known as P1020, and that type of aluminum is a globally priced physical commodity traded on the London Metals Exchange (LME). In every major region, that type of unwrought aluminum is typically priced with a regional premium that incorporates tariffs or duties, freight costs, and other supply/demand dynamics – reflecting the market price for inland delivery of the last pound of primary aluminum needed to satisfy total regional demand. In the United States, the Midwest Premium is published daily by S&P Global/Platts. The LME price for P1020 and the Midwest Premium (MWP) are two core elements of all aluminum pricing in the United States, and the price attaches to all aluminum sold in the United States regardless of the country of origin. Manufacturers in other regions use their own regional premium, like the Rotterdam Premium in the EU or the Japanese Premium in Asia (excluding China) – and exports from those foreign manufactures to North America typically contain aluminum that was sourced at a lower regional premium cost, giving those imports a cost advantage unless a tariff on the imported good matches the cost that U.S. producers face on input materials. This distinct structure means that many policy solutions that may work for the steel industry create significant challenges in the aluminum industry. Therefore, USMCA provisions for aluminum may require a different approach than those for steel.

The U.S. requires a healthy aluminum industry to meet defense and security manufacturing needs. Aluminum is used in many defense products – from fighter jets to battle armor to tanks. To produce specialized aluminum products for America's defense, the industry must also ship every day, high-volume products that come from the same facilities and supply chains. Making aluminum used in defense requires the same industrial capabilities as making cans, cars, and building materials.

Furthermore, aluminum is critical for the auto industry, and the Association appreciates that the during President Trump's first term, the United States successfully secured stronger automotive rules of origin requirements, which strengthened regional and domestic value content requirements, including a requirement that 70% of a vehicle manufacturer's steel and aluminum purchases by value must originate in the USMCA countries. That has positively impacted the aluminum industry in the auto supply chain.

Aluminum Industry Concerns

Since USMCA was signed in President Trump's first term, trade actions taken by the U.S. government and antidumping and countervailing duty (AD/CVD) interventions on behalf of the U.S. aluminum industry have resulted in economic conditions that spurred historic investment across the domestic aluminum industry.

Despite that success, Chinese and Russian metal imports into North America have displaced sales of U.S. products and accelerated the movement of U.S. manufacturing, largely into Mexico where few protections against non-market economy metal are in place. As a result, aluminum parts and products can be fabricated with unfairly traded unwrought or semi-fabricated aluminum and then shipped duty free into the U.S. For example, from 2017 to 2025, Mexican and Canadian imports of Chinese subsidized aluminum coil (HTS Code 7606) increased by 664,000mt (+310% vs. 2017) and exports of Chinese subsidized aluminum coil into Mexico and Canada are on pace to reach 598,000mk (+290% vs. 2017). Chinese exports of subsidized coil to Mexico increased by 265,000mt (+474%), and Chinese exports of subsidized coil to Canada increased 36,000mt (+88%). This is the equivalent of the capacity of a major U.S. rolling mill.

One unintended and unfortunate result of the USMCA was that it incentivized Chinese imports and Chinese investment in the Mexican economy. Within the USMCA framework, the rules of origin and enforcement mechanisms for USMCA must be updated to address this non-market-based economic activity. To benefit from tariff-free access into the U.S. market, both Mexico and Canada must ensure Chinese and other non-market economies' aluminum is restricted from the region.

Many aluminum industry customers have moved their metalworking factories and jobs outside of the U.S (primarily to Mexico) where they continue to buy Chinese subsidized coil and other aluminum products, take advantage of low-cost Mexican labor, and then leverage the USMCA to receive duty free entry into the U.S. This shift in manufacturing and jobs continues today.

The U.S. is at risk of losing many more of the approximately 6.4 million total U.S. manufacturing jobs as companies move facilities and production capacity to take advantage of subsidized Chinese aluminum. The risk is that the U.S. becomes an “assembly” rather than manufacturing capable country with significant adverse impacts on investment, jobs, communities, and national defense.

Given the significant concerns noted above, the Association offers the following recommendations, outlined in greater detail further below in the comments, to address these unintended consequences of the existing USMCA. Also outlined near the end of the comments are country-specific negotiating priorities as they pertain to both Canada and Mexico.

1. Mexico must establish an aluminum import monitoring system (AIM) as a prerequisite to further discussions on aluminum.
2. All three USMCA parties must harmonize tariffs at their borders to prevent the entry of non-market economy aluminum into North America.
3. USMCA rules of origin should include restrictions on unwrought aluminum that was smelted or cast in a non-market economy metal or a country subject to U.S. sanctions.
4. Strengthen the rules of origin for aluminum (HTS Chapter 76) by applying regional value content requirements and restrictions on non-market economy aluminum content.
5. Smelt and cast reporting requirements should be improved.
6. Continue to ensure the free flow of scrap (HTS 7602) within North America, while harmonizing scrap export restrictions.
7. Use Section 232 to address downstream product imports that incorporate articles subject to U.S. AD/CVD laws.

Mexico Must Establish an Aluminum Import Monitoring system (AIM) as a Prerequisite to Further Discussions on Aluminum

The Association strongly believes that a coordinated North American regional trade strategy for aluminum and other critical minerals will better insulate North America from importation of heavily state subsidized aluminum and critical minerals from China. In particular, the Association recognizes the value that both Canada and Mexico bring to the U.S. market when fully complying with regional trade laws, rules of origin requirements,

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and regional value content thresholds. However, our USMCA partners must fully implement their previous commitments as a prerequisite to any further engagement on preferential access to the U.S. market under USMCA.

In 2019, President Trump successfully secured commitments from both Canada[2] and Mexico[3] in exchange for providing an exemption for the Section 232 tariffs on aluminum products from each country. Included in those agreements were commitments to establish an aluminum import monitoring (AIM) system, prevent the importation of unfairly subsidized metal, and prevent the transshipment of aluminum made outside North America. While Canada implemented its own form of an AIM system within six months of that agreement, Mexico has still failed to do so. Mexico must immediately stand up an AIM system similar to that established by the U.S. government that tracks and reports country of smelt and country of most recent cast for imported aluminum products. Data from both the U.S. and Canadian AIM systems are publicly available, and these systems serve as an important trade enforcement tool that helps the government and industry monitor import trends, detect potential evasion of duties, and gain timely data on the aluminum market.

All Three USMCA Parties Must Harmonize Tariffs at Their Borders to Prevent the Entry of Non-Market Economy Aluminum into North America

Both Canada and Mexico should take further steps to protect the North American market from unfairly traded aluminum goods by aligning tariffs to restrict the import of unfairly subsidized aluminum from China and other non-market or transshipping economies, as Canada has already begun to do. While tariff harmonization was not an explicit commitment in the 2019 agreements, the Association believes it would be the most effective measure to achieve the previous commitments to prevent the importation of unfairly subsidized metal and transshipment of non-North American aluminum. This tariff harmonization across all three parties should, at a minimum, match the scope of the U.S.

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[2] https://ustr.gov/sites/default/files/Joint_Statement_by_the_United_States_and_Canada.pdf

[3] https://ustr.gov/sites/default/files/Joint_Statement_by_the_United_States_and_Mexico.pdf

Section 232 tariffs and include proper enforcement mechanisms for non-compliance. One important step in achieving a truly regional border is developing harmonized tariff classifications in all three USMCA member countries. This would ensure that national import statistics concerning all articles classifiable under Chapter 76 of the Harmonized Tariff Schedule of the United States (HTSUS) can be meaningfully compared among the U.S., Mexico, and Canada.

These steps should be taken for Canada and Mexico to be granted preferential tariff treatment with the United States. If these commitments are not fulfilled before the review, the industry supports the continuation of existing tariffs.

The U.S.-Mexico-Canada Agreement Should Strengthen the North American Aluminum Industry and Restrict Non-Market Economy Metal

The USMCA was a win in President Trump's first term, and the aluminum industry supports the continuation of USMCA with changes to make it more robust and work better for the aluminum industry. The USMCA provides an environment of long-term market stability and certainty, but the industry believes that there must be stronger restrictions and enforcement mechanisms to prevent non-market economy metal imports from taking advantage of an agreement that was intended to strengthen the North American aluminum industry.

As discussed above, one of the principal goals of the USMCA was to strengthen the trilateral trade relationship and effectively crowd out imports from non-market economies. Although there has been some success in achieving this goal as it relates to aluminum, the USMCA needs both stronger provisions relating to restrictions on aluminum from non-market economies and stronger enforcement of its provisions to be fully realized. Even six years into the agreement, U.S. manufacturers are facing unfair competition. U.S. aluminum manufacturers currently compete in Mexico, and to a lesser extent Canada, against subsidized Chinese metal. U.S. aluminum industry customers are turning to Mexico to access lower priced Chinese aluminum and aluminum products. Chinese producers also continue to find loopholes by utilizing government subsidies to establish physical operations in North America and exploiting weaknesses of USMCA. Limiting Chinese and other non-market economies' access to the North American market through metal flows or investment operations is imperative for American aluminum manufacturers. The U.S. should consider both a "carrot" and "stick" approach to this policy goal by providing greater incentives and benefits to using North American-made aluminum and aluminum products, and stronger rules of origin paired with tough enforcement mechanisms.

The Rules of Origin Should be Strengthened by Applying Regional Value Content Requirements and Restrictions on Non-Market Economy Aluminum Content

USMCA cannot fulfill its promise to support the entirety of the domestic aluminum industry without taking concrete actions to strengthen and grow demand for U.S. aluminum production. These actions include ensuring Canadian and Mexican markets provide a fair marketplace for U.S. manufactured aluminum by verifying both are free of Chinese and other government subsidized aluminum. Today, aluminum from China flowing into North America hinders market access opportunities for U.S. producers. As stated above, one key way to support the domestic industry is through more effective regional or domestic value content requirements. Furthermore, a product should be disqualified from USMCA benefits if it includes any aluminum that was smelted or cast in China or any other non-market economy. The aluminum content in mid, downstream, and derivative products should be subject to the same requirements as unwrought aluminum to prevent circumvention of these rules of origin.

Smelt and Cast Reporting Requirements for Aluminum Products Should Be Improved

The Association has supported the U.S. government's efforts to apply tariffs to metal of Russian origin and strongly supports measures in USMCA that prevent this metal, in addition to metal of Chinese origin, from circumventing these measures and entering the U.S. market through either Mexico or Canada. Provisions to report country of last smelt and country of last cast are required so that U.S. tariffs can be applied effectively at the U.S. border. However, the Association believes that improvements can be made to the existing smelt and cast reporting requirements so that they accurately reflect the flow and production of aluminum products and match the coverage of the Section 232 list, including derivative products. Nevertheless, the Association fully supports the disclosure of this information so that any commitments that are made by Mexico or Canada that are not fully implemented can be corrected with U.S. action at the U.S. border.

The Free Flow of Aluminum Scrap Should be Ensured within North America and Scrap Export Restrictions Should be Harmonized

Aluminum scrap exports have increased significantly in recent years and often end up in non-market economies such as China, either directly or through third countries, before it becomes new products that unfairly compete with American-made goods. Today, the U.S. runs a ~1.3 million metric ton annual trade deficit in aluminum scrap, though that gap has narrowed recently due to trade and tariff policy.

Meanwhile, the aluminum industry is investing heavily in new plants and capacity in the U.S., which is growing the need for scrap and other sources of metal. Over the past decade, the U.S. industry has invested more than $10 billion in new and expanded operations, including two, new multi-billion-dollar aluminum rolling mills for the first time since 1980. These rolling mills will consume an enormous amount of scrap aluminum, and keeping more of this material at home is critical to supporting these investments.

The U.S. currently imports used beverage containers (UBCs) and mill ready scrap from other countries, in particular from Canada and Mexico. In fact, nearly 90% of the ~700,000 metric tons of this imported scrap comes from Canada (61%) and Mexico (29.8%) and these scrap imports from North American trading partners provide a critical source of material for U.S. industry. Preserving the free flow of scrap in North America is essential, and imports of scrap from Canada and Mexico should be free of duties or restrictive measures as scrap is a critical input material for the domestic industry. Importantly, imported aluminum scrap should not be subject to "smelt and cast" reporting requirements as it is not possible to know where the scrap material was smelted. In this regard, scrap should be treated differently from primary aluminum and semi-finished products with no barriers that could impede scrap imports given their importance as a key feedstock for the U.S. aluminum industry.

UBCs are defined with a unique tariff code, highly sought after by U.S. re-melters, and much needed today. The Association is advocating for an immediate ban on all UBC exports which will support U.S. aluminum industry investment in the near term and further efforts to onshore manufacturing. Importantly, the UBC export ban should not apply within North America where the free flow of aluminum scrap is vital for industry throughout the region. Imported aluminum UBCs are a vital feedstock for the domestic can sheet market especially and should be traded within North America with zero tariffs or other restrictions. As the USMCA review proceeds, the U.S., Canada, and Mexico should work to harmonize trade and tariff policies on scrap and other aluminum products.

Section 232 Action Is Needed to Address National Security Threats from Downstream Product Imports That Incorporate Articles Subject to the U.S. AD/CVD Laws

The Association and certain of its member companies have pursued remedies under the U.S. AD/CVD laws – first against dumped and subsidized imports of aluminum sheet and foil from China and soon after against unfairly-traded imports from other countries that flooded in to replace Chinese products. While these actions have helped to restore a level playing field and fair prices in the U.S. market, they have nonetheless resulted in the diversion of large volumes of sheet and foil from these unfairly traded sources to Mexico and Canada. In 2024, Mexico was by far the largest destination for China's exports of aluminum sheet (more than one billion pounds) and the third largest destination for exports of foil, while Canada was the fourth largest destination for Chinese exports of aluminum sheet. As described previously, this diversion of low-priced Chinese products impedes U.S. market access into Canada and Mexico, and it also harms U.S. producers' customers that are confronted by U.S. imports of low-priced products from Mexico and Canada that incorporate unfairly traded products that have been diverted from the U.S. into Mexico and Canada.

We believe both challenges can be addressed by the President's further exercise of his authority under Section 232 of the Trade Expansion Act of 1962. Specifically, we encourage the President, pursuant to existing Section 232 proceedings where the President has already imposed tariffs, to impose an additional tariff on imports of articles from Mexico and Canada (and other countries) that incorporate a product that would be subject to AD/CVD duties if imported into the U.S. directly. Under this proposal, for example, if a widget is manufactured in Mexico from common alloy aluminum sheet from China, upon importation into the United States, using Section 232, the imported widget would be assessed with a tariff equal to the amount of the AD/CVD duty that would have applied to the aluminum content of the widget had it been imported directly into the United States (and, potentially, an additional derivative product tariff pursuant to other actions taken by the President).

Such an action would be consistent with the President's America First Trade Policy and prevent circumvention of U.S. AD/CVD laws. This is particularly important for products being diverted through Canada and Mexico, given that those countries enjoy preferential access to the U.S. market as USMCA partners. The USMCA should ensure that its benefits go primarily to North American manufacturing and do not benefit third country unfair traders at the expense of U.S. manufacturers. In order to achieve meaningful tariff harmonization in North America, the Administration also must take action to achieve harmonization with respect to AD/CVD actions to ensure that goods that have been determined by U.S. authorities to be unfairly traded and injurious to a domestic industry do not enter the United States in downstream products.

U.S.-Canada Aluminum Priorities

The Association firmly believes in a unified North American trade strategy for aluminum with strong protections and rules. As discussed above, the Association recognizes that Canada has already taken significant steps to comply with existing trade commitments, and taken additional measures on its own, but more can be done across North America to reduce unfair competition from China and help boost demand for regional aluminum.

The U.S. and Canadian aluminum industries are deeply integrated and underpin continental supply chains that strengthen the importance of Canada as a key supply partner for the U.S. aluminum industry. Over the last ten years, Canadian producers have invested an additional $10 billion to support U.S. demand. Canada supplies the U.S. aluminum industry far more than any other country in the world, accounting for 55 percent of U.S. unwrought aluminum supply. Today, the United States has advanced in downstream aluminum production and Canada continues to leverage its low-cost energy to produce primary aluminum. About 90 percent of Canada's primary aluminum production is exported to the United States, where it is used as a critical input for further processing into products consumed by aluminum-reliant downstream sectors, including automotive, building and construction, and defense, for U.S. domestic and export markets. As a result of this integration, each Canadian aluminum industry job supports approximately 13 U.S. aluminum industry jobs. The U.S. in turn exports $2 billion worth of aluminum products to Canada. Continued access to reliable, secure, primary Canadian aluminum is essential for continued U.S. aluminum manufacturing growth.

It is vital for any preferential trade relationship with Canada to be founded on full harmonization of aluminum tariffs and comprehensive metal tracking to ensure tariffs are properly applied to non-market economies. The government of Canada has demonstrated its willingness to comply with international trade commitments and has taken action to impose trade barriers limiting imports of Chinese metal entering Canada. Additionally, Canada stood up its own AIM system, thereby fulfilling a commitment made in connection with Canada's previous exemption from the Section 232 tariffs on aluminum products.

There are further opportunities to continue this work with Canada by fully harmonizing regional trade barriers against imports of metal from non-market economies and maintaining the free flow of aluminum scrap, as outlined earlier in our comments. The Association looks forward to engaging with the Administration to strengthen the U.S.-Canada aluminum trading relationship in a way that supports and increases demand for North America-produced aluminum.

U.S.-Mexico Aluminum Priorities

The Association firmly believes that a unified North American trade strategy for aluminum with strong protections and rules will reduce unfair competition from China and help boost demand for aluminum produced within North America. We recognize that Mexico serves as an important value-added partner to support U.S. aluminum manufacturers. High-value aluminum and aluminum-reliant production activities could support the U.S. market if the Mexican government – and manufacturers operating in Mexico - fully comply with international trade commitments.

To maximize the potential of the U.S. and Mexican industries as supply chain partners, it is imperative that Mexico rectify its failure to comply with previous trade commitments. As previously mentioned, both the U.S. and Canada have implemented an AIM system. The government of Mexico has not yet implemented such a program, despite commitments to do so. The Mexican government's delay in establishing a transparent monitoring system is of great concern to the Association, given the significant volumes of aluminum and aluminum products from China that are entering Mexico. Further, this program should be accompanied by enforcement for noncompliance if there is a failure to accurately and comprehensively report the country of origin of smelt and most recent cast.

More generally, the Association is deeply frustrated by Mexico's failure to publish comprehensive and transparent trade data. Regrettably, in addition to failing to fulfill its commitment to establish an import monitoring system, the Mexican government has also failed to report comprehensive and transparent trade statistics on imports of products classifiable under Chapter 76 of HTSUS. This has been particularly true with respect to the government of Mexico's reporting of imports of primary aluminum but is also true with respect to imports of aluminum sheet and plate, aluminum foil, and aluminum tubes and pipes. This lack of full transparency and comprehensive reporting has raised concerns by the Association and its members as to whether the unidentified volumes entering Mexico involve aluminum that originates in China. The current circumstances are an unpleasant reminder of the situation in the mid-2010s when unscrupulous entities exploited Mexico's openness to import extremely large volumes of aluminum for re melting purposes, only to re-export those products once the circumstances were reported in the press. To maintain continued harmony within the North American market, it is in the interest of the collective industry and consumers to avoid an analogous situation in connection with the lack of comprehensive reporting in the Mexican government's trade statistics.

Additionally, the Association has considerable concerns with respect to duty exemption programs like the IMMEX maquiladora program. As currently implemented, the IMMEX program creates a loophole that allows subsidized and unfairly traded aluminum products from nonmarket economies like China to receive refunds for any tariffs paid at the border that subsequently enter the U.S. market, undermining U.S manufacturers and the U.S. trade policy goals. Without changes to this program, any border tariff measures announced by Mexico will fail to fully address the flood of unfairly subsidized imports from China and other non-market economies. In order for regional tariff harmonization to be truly effective, products made with or from non-market economy aluminum should not be eligible for duty drawback exemptions. The Association therefore urges the U.S. government to work with Mexico to better tailor and enforce their trade measures so that duty drawback programs do not continue to allow unfairly traded foreign metal to enter the U.S.

To ensure that the benefits of North American integration in the aluminum industry can be appropriately highlighted, Mexico needs to take important actions to ensure greater transparency in aluminum-related shipments imported into Mexico by establishing an aluminum-specific import monitoring program comparable to those stood up in the U.S. and Canada and restarting the publication comprehensive, transparent aluminum-related import statistics. Further, Mexico must work to harmonize regional trade barriers against imports of metal from non-market economies and maintain the free flow of aluminum scrap, as outlined earlier in our comments. The Association looks forward to engaging with the Administration to strengthen the U.S.-Mexico aluminum trading relationship in a way that supports and increases demand for North America-produced aluminum.

Conclusion

The aluminum industry believes that the USMCA has the potential to significantly expand domestic manufacturing and grow demand for North American-made aluminum and aluminum products. The Association supports the continuation of USMCA, provided it includes the key improvements laid out in our comments that will strengthen protections against unfairly subsidized non-market economy metal, better incentivize the use of North American-made aluminum and aluminum products over government subsidized imports, and strengthen the long-term competitiveness of the U.S. aluminum industry.

The Association and its member companies appreciate USTR's consideration of these comments, and Association staff look forward to testifying at the upcoming subject matter hearing. Please do not hesitate to contact us with any questions regarding this submission.

Sincerely,

Will Brown
Vice President, Government Relations and International Programs
The Aluminum Association