



**David McCall**  
International President

August 27, 2024

The Honorable Gina M. Raimondo  
Secretary of Commerce  
U.S. Department of Commerce  
14th Street and Constitution Avenue, N.W.  
Washington, D.C. 20230

The Honorable Amy A. Karpel  
Chair  
U.S. International Trade Commission  
500 E Street, SW  
Washington, D.C. 20436

Dear Secretary Raimondo and Chair Karpel:

On behalf of the United Steelworkers (USW), I write today in strong support of the antidumping and countervailing duty (AD/CVD) petitions filed by the American Alliance for Solar Manufacturing Trade Committee (Alliance Trade Committee). USW is the largest industrial union in North America, representing workers in steel, aluminum, and other metals; paper; rubber; glass; cement; chemicals; refining; and, of course, in solar production and related supply sectors.

The USW has a stake not only in the supply chains for products utilized in the manufacturing of solar cells and panels but looks forward to representing workers at solar manufacturing facilities as well. America's green energy future needs to be built with American workers across the supply chains, in the factories, as well as in the installation, maintenance, and repair of such products.

The People's Republic of China (PRC) has subsidized the construction of solar manufacturing facilities in other countries, particularly in Cambodia, Malaysia, Thailand, and Vietnam. A number of these facilities are state-owned, supported by Chinese Communist Party (CCP) policies, operated by companies based in the PRC, and often make solar panels and cells with PRC based materials. They exist for a single purpose: to violate U.S. trade laws and dump in our market while avoiding enforcement actions.

USW joins the Alliance Trade Committee in urging you to investigate the unfair trade practices by primarily companies based in the PRC but operating in Cambodia, Malaysia, Thailand, and Vietnam that are significantly injuring the U.S. solar industry. Together, those four nations comprised 84% of U.S. panel imports in the fourth quarter of 2023.<sup>1</sup> The value of imports of solar cells and modules from Cambodia, Malaysia, Thailand, and Vietnam increased by 141% from 2021 to 2023, reaching more than \$12 billion.

The Solar Energy Manufacturers for America predict this glut will only have worsened when the data are available for 2024. In addition to antidumping, subsidies, and circumvention, some solar importers in the U.S. were proactively stockpiling solar panels in a pre-emptive effort to avoid potential AD/CVD duties now that the two-year moratorium has expired.<sup>2</sup>

<sup>1</sup> S&P Global Market Intelligence Global Trade Analytics Suite

<sup>2</sup> [https://iea.blob.core.windows.net/assets/96d66a8b-d502-476b-ba94-54ffda84cf72/Renewables\\_2023.pdf](https://iea.blob.core.windows.net/assets/96d66a8b-d502-476b-ba94-54ffda84cf72/Renewables_2023.pdf)

As a result of the activities of these PRC headquartered operations in the four countries, the Alliance Trade Committee has calculated alleged dumping margins for the four countries involved: 271.45% for Vietnam; 126.07% for Cambodia; 81.24% for Malaysia; and 70.35% for Thailand.

The PRC's playbook on illegal trade practices is no secret: subsidize, create excess capacity, pay low wages, dump, open operations in low-wage countries to circumvent; and surge into international markets. The PRC has been doing this across industries for almost 25 years now since the U.S. granted it Permanent Normal Trade Relations status: steel, tires, chemicals, paper products, aluminum extrusions, and solar, to name just a few.

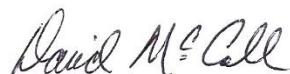
In recent years, the CCP has designated its "New Three" strategic industries to monopolize, which include electric vehicles (EVs), lithium-ion batteries, and the solar supply chain.<sup>3</sup> In addition to building facilities in nearby nations to circumvent U.S. trade laws, firms based in the PRC currently produces 90% of the world's solar-grade polysilicon and almost 100% of the wafers utilized to supply those facilities. This allows China's state planning to dominate the global solar supply chain at the expense of U.S. firms and workers.

The U.S. currently employs more than 30,000 workers in the solar supply chain, but with a fair and level international solar market, that number could climb to hundreds of thousands. The PRC's dominance of the global solar supply chain through its unfair and illegal operations, funded and supported by the CCP, creates significant economic, defense, and energy security risks for the United States and other nations. U.S. companies, such as those leading the Alliance Trade Committee, and U.S. workers, like those represented by the USW, deserve to compete on a level playing field.

America's green energy future needs to be built with American workers and American innovation across the solar supply chain and it is very critical for the American manufacturers in the Alliance Trade Committee to build factories at scale to compete with firms based in the PRC.

The USW urges careful consideration of the petitions filed by the Alliance Trade Committee. American solar jobs and the domestic industry are on the line. Finally, it is critical that all four countries—Cambodia, Malaysia, Thailand, and Vietnam be included, as a negative determination for one country will lead PRC-owned producers to shift production to that nation. USW strongly supports the AD/CVD petitions of the Alliance Trade Committee. U.S. solar production and energy security can expand and thrive if given a fair and even playing field.

Sincerely,



David McCall  
International President

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<sup>3</sup> <https://www.chinadaily.com.cn/a/202307/14/WS64b07dd1a31035260b81650f.html>