



Concerns Regarding Emerging U.S. Critical Minerals Deals

March 19, 2026

Re: Docket Number USTR-2026-0034

Thank you for the opportunity to comment “on the Design of a Plurilateral Agreement on Trade in Critical Minerals and Policy Actions to Strengthen the Resilience of Critical Mineral Supply Chains” (91 Fed Reg. 9686, Feb. 26, 2026).

On December 3, 2025, the undersigned organizations sent a letter to the President expressing our concerns and solutions for emerging US critical minerals trade deals.¹ As the USTR contemplates a potential plurilateral agreement on critical minerals, including through reference pricing or other mechanisms, we reaffirm the contents of that letter, which we submit to this docket.

Thank you for your consideration.

¹ Please see December 3, 2025 letter from over 35 civil society, faith, environmental, and human rights organizations to President Trump. Attached below and available at: <https://www.citizen.org/wp-content/uploads/CMA-Letter-Dec-2025-4.pdf>

December 3, 2025

President Donald J. Trump
The White House
1600 Pennsylvania Avenue NW
Washington, DC 20500

Dear Mr. President:

We, the undersigned organizations, are writing to express our concern over reports of potential critical minerals deals underway and urge your administration to change course to allow for broad public participation and ensure the rights of vulnerable communities are protected before any critical mineral-related deals are finalized.

The Biden administration rightly received bipartisan criticism after it hastily negotiated a critical minerals agreement with Japan. Republican and Democratic congressional leaders alike slammed the administration for the deal's rushed and opaque process, lack of congressional and public consultation, and failure to include any meaningful labor, environmental, or human rights standards in the infamously dangerous and dirty minerals mining and processing industries. While details are scant, we understand that this administration is also pursuing deals related to critical minerals supply chains with other countries.

Insofar as the Trump administration proceeds with any trade, investment, or fiscal agreements or initiatives related to critical minerals supply chains, such deals must be developed through transparent and participatory processes that allow for informed input from all interested stakeholders, especially the communities most impacted by mining and mineral processing. In addition, any such deals must undergo Congressional review and approval, as is required by the Constitution.

The stakes of any U.S. deal to secure access to critical minerals are particularly high for already-vulnerable communities, as displacement of Indigenous Peoples, forced labor, environmental destruction, and other widespread labor and human rights abuses are widely documented throughout minerals mining, recovery, and processing supply chains. Critical minerals agreements must not perpetuate an extractivist model that drives these ongoing harms.

We raise particular concerns with the “minerals for security” deal signed between the U.S. and Ukraine, as well as potentially exploitative minerals-related negotiations with the Democratic Republic of Congo and other countries experiencing conflict. We reject agreements that are for the purposes of control rather than partnership, and object to such agreements prioritizing increased militarism and investor profits at the expense of a just clean energy transition.

Instead, any deal related to critical minerals trade must contain measures that help the United States and its trade partners meet important climate, job creation, sustainable development, and human rights goals. Key initial steps toward these ends include ensuring any agreements contain:

- Robust provisions aimed specifically at advancing minerals circularity, ensuring that transition minerals are traced, reused, refurbished, and recycled as often as possible rather than burned or landfilled at the end of mineral-containing products' initial lifecycles;
- Strong and binding labor, environmental, Indigenous rights, human rights, and transparency standards backed by swift and rigorous enforcement mechanisms, building on those recommended in the Principles to Ensure Energy Transition Minerals Advance Justice, Equity and Human Rights, and by the Initiative for Responsible Mining Assurances (IRMA), the International Labour Organization (ILO), the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP), and other bodies.
- Policy measures, investments, technical support, and other measures that aid in the expansion of value-chain job creation in the United States and other regions where minerals are extracted or recovered.

We will vigorously oppose any critical minerals deal that does not contribute to sustainable development in both the U.S. and partner nations, does not include meaningful participation from affected communities, and does not include strong, binding standards and enforcement mechanisms to uphold human rights, labor, and environmental protections.

Sincerely,

African Diaspora Connection

African Immigration Initiative

American Friends Service Committee

Black Hills Clean Water Alliance

Chip Workers 4 Responsible Mining

Climate Rights International

Earthjustice

Earthworks

Free Congo Bay Area

Friends of the Congo

Friends of the Earth US

Global Witness

GreenLatinos

Greenpeace International

Interfaith Center on Corporate Responsibility

Jewish Earth Alliance- PA

Justice Is Global

Maryknoll Fathers and Brothers

Maryknoll Office for Global Concerns

Mighty Earth

NETWORK Lobby for Catholic Social Justice

New Mexico Environmental Law Center

Occupy Bergen County

Passionist Solidarity Network

Plug In America

Presbyterian Church (USA), Office of Public Witness

Public Citizen

Resource Justice Network

Satya Bumi

Sierra Club

Sisters of Mercy of the Americas Justice Team

The United Methodist Church - General Board of Church and Society

Trade Justice Education Fund

Unitarian Universalists for a Just Economic Community

United Church of Christ

United Electrical, Radio & Machine Workers of America (UE)