



March 19, 2026

Docket Number USTR-2026-0034, “Request for Comments on the Design of a Plurilateral Agreement on Trade in Critical Minerals and Policy Actions to Strengthen the Resilience of Critical Minerals Supply Chains”

The American National Standards Institute (ANSI) submits the following comments in response to USTR’s request on the design of a plurilateral agreement on trade in critical minerals. As the coordinator of the U.S. voluntary, private-sector-led standards and conformity assessment system and the official U.S. representative to ISO, ANSI has a direct stake in—and concrete contributions to make to—the standards dimensions of this agreement. Our comments focus on how internationally recognized standards and conformity assessment can serve as foundational tools for resilient, high-integrity critical mineral supply chains.

Critical minerals underpin U.S. economic competitiveness, national security, and technological leadership. They are essential inputs for defense systems, energy infrastructure, advanced electronics, and manufacturing. Unfair trade practices in this sector can destabilize markets, threatening U.S. national and economic security and placing American industry at a disadvantage.

In sectors of strategic importance, standards are not merely technical tools—they shape economic and market outcomes. International standards bodies have become arenas for strategic competition, not just technical collaboration. Active, coordinated engagement by foreign government-backed stakeholders—particularly in strategic sectors like critical minerals—underscores the importance of robust, sustained, and well-resourced U.S. participation.

A well-crafted plurilateral agreement among partner nations, paired with targeted policy actions, can help ensure U.S. access to resilient critical mineral supply chains governed by market principles and underpinned by credible, internationally accepted standards. Broad alignment on standards would help U.S. industries maintain their competitiveness, support quality jobs, and accelerate the deployment of emerging technologies under American leadership.

The agreement should include explicit standards-related provisions. Specifically, it should:

- **Formalize a commitment to market-based sourcing.** Referencing internationally recognized standards in the agreement would signal a collective preference for supply chains governed by transparent, rules-based principles—and for sourcing from projects that meet internationally recognized technical benchmarks rather than those shaped by state direction or subsidy.
- **Recognize standards as a trade tool.** Explicit standards provisions would affirm the value of sourcing materials from projects that adhere to international benchmarks — and create a framework for narrowing the competitive effects of regulatory barriers and unfair practices.

- **Leverage conformity assessment.** Standards only deliver value when compliance can be verified. The agreement should acknowledge the role of accredited conformity assessment bodies in providing that assurance across complex, multi-country supply chains.

Industry and market-driven standards are effective tools for stabilizing supply chains, ensuring the reliability and consistency of supply chain activities, and establishing robust traceability systems. Globally recognized specifications developed through international consensus—such as those produced under ISO Technical Committee 82/Subcommittee 7 (Sustainable mining and mine closure), ISO Technical Committee 298 (Rare Earth), ISO Technical Committee 333 (Lithium), ISO Technical Committee 345 (Materials for specialty technologies), and related ANSI-coordinated initiatives—give businesses a common framework for quality, safety, and trade facilitation. Including such standards by reference in a plurilateral agreement would put these tools to work in service of shared economic and security interests.

ANSI stands ready to support implementation of a plurilateral agreement in several concrete ways. We have a demonstrated track record of organizing workshops and private-sector-led delegations to address non-tariff barriers, promoting standards adoption in partner and emerging-economy markets, and supporting the conditions for U.S. industry to compete on a level playing field internationally. Through public-private partnerships, ANSI engages with producer countries on standards development, trade, infrastructure, and regulatory alignment.

We urge USTR to include in the agreement an explicit commitment by all parties to participate actively in the international standards development processes that govern critical mineral supply chains—and to support capacity-building efforts that enable producer nations to engage as full participants in that work. Robust participation strengthens the standards themselves, broadens the base of supply chain partners, and advances U.S. interests in a rules-based international trading system.

ANSI welcomes the opportunity to discuss these recommendations further and to serve as a resource to USTR as this agreement takes shape.

Mary Saunders
Senior Vice President for Government Relations and Public Policy
American National Standards Institute
1899 L Street, N.W.
Washington, D.C. 20036
msaunders@ansi.org