



Ken Neumann
National Director/ Directeur national

June 23, 2017

Via email: Aluminum232@bis.doc.gov

Brad Botwin,
Director, Industrial Studies, Office of Technology Evaluation, Bureau of Industry and Security,
U.S. Department of Commerce,
1401 Constitution Avenue NW.,
Room 1093,
Washington, DC 20230

Dear Director Botwin:

RE Section 232 National Security Investigation into Aluminum Imports

We are two of the Canadian Directors of the United Steelworkers writing on behalf of our thousands of members in the Aluminum Industry in Canada.

We are writing to supplement the testimony provided by Robert Smith, the President of the United Steelworkers Local 420-A, in Massena New York, as well as the submission filed by United Steelworkers International President Leo W. Gerard in the above captioned investigation.

The Steelworkers are a binational union with significant membership in both the U.S. and Canada. In Canada, we represent 225,000 members, with many thousands of members employed in the Aluminum industry, primarily in the Province of Quebec.

Over 50% of the Aluminum Imports into the U.S. market come from Canada. As Mr. Smith notes in his testimony, Canadian production is not fueled by illegal and predatory trade practices that support the aluminum exports of some other producers outside of North America. Moreover, Canadian aluminum does not pose a threat to the national security of the United States.

We write to support the position expressed by President Gerard that Canada should be exempted from any potential action arising from this Investigation. Canada and the U.S. are close allies and economic partners, sharing the longest uncontested border in the World. Our two economies are profoundly integrated, with billions of dollars in goods crossing the border each week. Indeed, for 35 U.S. States, Canada is their largest export market and trading partner.

The Canadian and U.S. aluminum and manufacturing sectors are also highly integrated. The U.S. is by far Canada's largest market for aluminum products, and interrupting the supply of aluminum trade between our two countries would create significant economic harm and would contribute nothing to the security of either country.

United Steel, Paper and Forestry, Rubber, Manufacturing, Energy, Allied Industrial and Service Workers International Union
Syndicat international des travailleurs unis de la métallurgie, du papier et de la foresterie, du caoutchouc,
de la fabrication, de l'énergie, des services et industries connexes

800-234 av.Eglinton Ave. E., Toronto ON Canada M4P 1K7 - 416-487-1571 - 416-482-5548 (Fax/Télé.) - www.usw.ca

Finally, we are also mindful of the need to strengthen the enforcement of Canadian trade laws to address the competitive challenges and threats to the aluminum sector, and to ensure that Canada is not used as a way-station for imports from overseas to enter the U.S. market in circumvention of U.S. law. In this regard, we have been actively advocating for the modernization and strengthening of Canadian trade remedy laws, and we note that a package of improvements were recently introduced by the Canadian Government as part of Bill C-44 which is presently before the Canadian Parliament. We also expect further improvements to Canadian trade law in the fall of this year, when we hope the Canadian Government will introduce changes to make the Canadian trade remedy process more open to participation from trade unions and other groups that are affected by illegal trade practices.

In conclusion, we submit that Canadian made aluminum imports do not threaten to impair U.S. national security. We echo President Gerard and our union colleagues in the U.S. aluminum sector in respectfully requesting that Canada should be exempted from any recommended actions which may result from this Investigation.

Sincerely,



Ken Neumann
National Director for Canada



Alain Croteau
Director, USW District 5

KN/AC/slq

cc. Leo Gerard, USW President