



Battery Materials & Technology Coalition Response to the Notice of Request for Comment (RFC) on the Draft Harmonized System (HS) Code List of Critical Supply Chains

The Battery Materials & Technology Coalition (BMTC) appreciates the opportunity to provide input to the U.S. Department of Commerce (DOC) and the International Trade Administration (ITA) in regards to the Draft Harmonized System (HS) Code List of Critical Supply Chains request for comment (RFC). If you have any questions about this RFC response, please contact Emma Bishop at ebishop@vennstrategies.com, or at 1341 G St NW, 6th Floor, Washington DC, 20005.

I. Introduction to BMTC

BMTC is a coalition that unites the battery materials industry behind a shared goal to scale a North American battery supply chain. Launched in December 2020, BMTC is comprised of 16 member companies that mine, extract, process, manufacture, and recycle battery materials and components in the U.S. and Canada. BMTC members are committed to ensuring that governments and private industry across North America seize the opportunity to secure the supply chains that electrify our economy and power our way of life.

We are submitting this response on behalf of our 3 silicon industry members – Hemlock Semiconductor, REC Silicon, and Sila Nanotechnologies, all of which produce materials that play a critical role in energy supply chains, including those for battery materials.

II. Additions Needed to the List of Critical Goods and Materials

We are writing to encourage DOC and ITA to consider the addition of **silane (2850.00.5000)** and **trichlorosilane (TCS) (2853.90.9090)** to the list of critical goods and materials under both the information and communications technology (ICT) and the energy supply chain sectors. Silane and trichlorosilane are used to produce silicon nanoparticles in graphite-based battery anodes and are the only two raw materials used to make polysilicon, the foundational material required to produce semiconductors and solar cells. It is crucial that the U.S. add both materials to the ICT and the energy supply chain sector lists of critical goods and materials to ensure the U.S. directly addresses the supply chains of both materials and their applications to bolster the security of domestic energy and technology industries.

- **Silane:** Silane is a critical precursor material for specialty gases as well as a feedstock for the manufacturing of polysilicon. Polysilicon is used in silicon microprocessors, memory and power devices, power control devices, semiconductor devices, and solar cells. Silane is also used for emerging technologies such as next-generation batteries, which are growing in demand for electric vehicles and high-tech information processing devices.
- **Trichlorosilane:** Similar to silane, TCS is a key raw material to make polysilicon and is also used to make or deposit silicon nanoparticles for graphite-based anodes, which increases the storage capacity of the anode in lithium-ion batteries. Semiconductor manufacturers also use TCS to deposit an epitaxial film on top of silicon wafers. TCS is made by reacting silicon metal with hydrochloric acid (HCl).

III. Closing Statement

To bolster domestic industry capabilities, BMTC urges DOC and ITA to include silane and trichlorosilane on the Harmonized System (HS) Code List of Critical Supply Chains. We look forward to reviewing the updated list and continuing to work with the administration and Congress in advancing the growth of U.S. energy and technology supply chains.