



September 25, 2025

Dr. Sarah Ryker
Acting Director
United States Geological Survey
12201 Sunrise Valley Drive
Reston, VA 20192

Re: 2025 Draft List of Critical Minerals

Dear Acting Director Ryker,

We would like to congratulate you and the USGS team on the publication of the 2025 draft list of critical minerals. The list has become increasingly important since its first iteration in 2018, as critical minerals and many of their derivatives - including batteries, drones, combat vehicles, and other mission-critical end-use applications - are playing a role globally in the nexus between economic vitality, national security, and energy dominance for the American people.

The positive impact of the list on domestic critical mineral producers cannot be overstated. As you are aware, China dominates global production of battery materials by employing a variety of concerted policy actions that directly undermine the growth of foreign competitors. The USGS has incredible standing due to your unparalleled field work, data collection, economics, and market analysis which helps shape criticality for the minerals industry and furthermore informs policymaker actions on federal funding, regulations, and legislation. In turn, this assistance allows the U.S. industry to compete on a more level playing field with China on key minerals of significance.

BMTC is excited to see that many of the minerals essential to the battery supply chain have remained on the list, including graphite, lithium, nickel, manganese, and cobalt. They are all vital minerals that have high-risk supply chains due to China's unethical trade practices. In addition to battery applications, these minerals are also crucial for military equipment, industrial applications, transportation infrastructure, and telecommunications and energy systems.

We applaud the decision to add silicon to the list, as it is rapidly gaining traction in the battery industry due to its ability to boost the performance of a lithium-ion battery in the anode manufacturing process. By supporting next-generation battery materials like silicon while continuing to support materials needed for existing battery technologies, the U.S. can help grow competitive industries for technologies that are needed today and in the future.

We also thank you for retaining graphite as it was defined on the 2022 list. Since the decision was made in 2022 to drop the qualifier "(natural)", it has had a wide-ranging and positive effect on the domestic synthetic (or artificial) graphite industry. This attention from the Federal government is

timely given China's utter dominance of the global graphite market – in 2023, it produced 79% of the world's natural graphite and 97% of synthetic graphite for use in anode material.

BMTC also wants to emphasize the importance of utilizing the USGS list across the federal government. It is a very important authority that can help sync efforts across the federal interagency, Congress, and other relevant entities. For example, the Department of Labor could refer to the list when tracking goods made by child and forced labor and identify when one of the 54 critical minerals is produced by unacceptable labor conditions. The Department of Commerce could use the list to install effective tariff policies, while the Hill could reference it when crafting complex legislation involving tax incentives, funding programs, and the like. Widespread implementation of the list would create a stable reference point for the government and for industry, and in the process eliminate the confusion that occurs today because of the existence of multiple competing lists.

We thank you for your consideration of our feedback. The USGS Critical Minerals List is an irreplaceable tool to help establish an independent and resilient critical mineral supply chain in the United States to counter Chinese market dominance. As new innovations and market forces emerge, the list should always reflect the state of the critical minerals industry in the U.S., and we look forward to working with USGS to help shape the list in the years to come.

Sincerely,

Ben Steinberg
Spokesperson
BMTC