



# International Union of Operating Engineers

AFFILIATED WITH THE AMERICAN FEDERATION OF LABOR AND CONGRESS OF INDUSTRIAL ORGANIZATIONS

May 7, 2024

The Honorable Gina Raimondo  
Secretary of Commerce  
1401 Constitution Avenue, NW  
Washington, DC 20230

Dear Secretary Raimondo:

The International Union of Operating Engineers is deeply concerned by a petition for antidumping and countervailing duties covering crystalline silicon photovoltaic cells and modules imported from Cambodia, Malaysia, Thailand, and Vietnam. The petition will disrupt the American solar supply chain, creating volatility in the burgeoning industry, while stymying job creation and the deployment of clean energy. The Operating Engineers respectfully request that you deny the petition and end the uncertainty it causes.

The International Union of Operating Engineers (IUOE) is one of North America's leading construction unions, representing 400,000 hardworking men and women in the United States and Canada. Most members of the IUOE work in the construction sector, operating and maintaining heavy equipment; thousands of us are employed building the nation's energy infrastructure, pipelines, and generation. The IUOE also represents Stationary Engineers – skilled maintenance workers who operate and maintain industrial, commercial, and public facilities across North America. We also manufacture petrochemicals and other energy products. Members of the Operating Engineers install, operate, and maintain solar arrays across the country. As a signatory to the National Wind Turbine Agreement, the National Pipeline Agreement, and the Tri-Trades Solar Agreement, the IUOE represents a skilled workforce at the forefront of addressing the nation's energy needs.

Our members' jobs will be jeopardized due to the uncertainty generated by this trade case. This petition is the largest ever filed in terms of trade value (\$12.3 billion in 2023), and its reach will subject the development of the American solar industry to uncertainty. The petition is also undermined by the facts from the industry: Nearly two-thirds of the jobs in the solar industry are in installation and development. U.S. solar manufacturing represents a small part of the sector's employment – less than thirteen percent. Yet it is growing, and its growth offers evidence that the Inflation Reduction Act is working.

Since passage of the Inflation Reduction Act, more than 250 gigawatts of manufacturing capacity have been announced across the solar supply chain, representing more than 27,000 potential jobs and more than \$14 billion in announced investments. Across the United States, companies are seeking the 45X and 48C manufacturing tax credits from the Inflation Reduction Act to expand domestic solar manufacturing.

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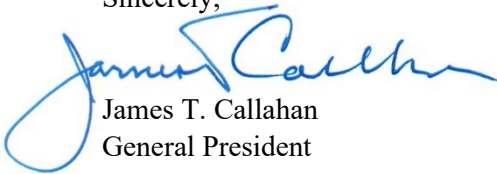
President Biden has been the most pro-union president in American history, and we appreciate his Administration's support for policies that protect and empower workers. The President's goals to make the United States a leader in clean energy, including solar power, are a critical part of this mission, and his policies have given Operating Engineers a new foothold on jobs in the solar industry. Operating Engineers and other crafts are building this clean-energy future, constructing thousands of megawatts of solar power in the last couple of years. But advancing this petition would threaten our country's clean-energy ambitions and Operating Engineers' livelihoods.

These non-union companies' petition stymies job creation for members of the International Union of Operating Engineers and other union construction workers. The solar industry will not realize its full potential in America unless the Department rejects petitions like this one. Their petition costs jobs of unionized American workers, plain and simple.

The International Union of Operating Engineers respectfully requests that the Department of Commerce reject the anti-dumping duty (ADD) and countervailing duty (CVD) petition on solar products from Southeast Asia. Such a determination is necessary to ensure the clean-energy future envisioned by the Biden Administration and the IUOE.

Thank you for your consideration.

Sincerely,



James T. Callahan  
General President

