



UNITED BROTHERHOOD OF CARPENTERS AND JOINERS OF AMERICA

Thomas J. Flynn

General Secretary-Treasurer

February 16, 2022

The Honorable Gina M. Raimondo
Secretary of Commerce
U.S. Department of Commerce
14th Street & Constitution Avenue, NW
Washington, D.C. 20230

Dear Secretary Raimondo:

The United Brotherhood of Carpenters and Joiners of America (“UBC”), representing more than 400,000 members across the United States, is writing to express concern about a request for country-wide circumvention inquiries brought by Auxin Solar – a single, small U.S. manufacturer – covering crystalline silicon photovoltaic (“CSPV”) products imported from Malaysia, Thailand, Vietnam, and Cambodia. Through these actions, Auxin Solar is attempting to single-handedly expand the reach of antidumping and countervailing duties on solar products from China to the vast majority of solar imports into the United States.

This request would jeopardize thousands of UBC jobs. Many of these jobs employ new members in our union. The circumvention ruling requests would significantly impact solar panel imports into the United States and eliminate millions of dollars in economic opportunity across the U.S. The broader solar industry employs roughly 230,000 U.S. workers and many of those solar jobs – including union jobs – would be put at risk if a significant percentage of the CSPV module supply was suddenly subjected to steep tariffs and duties.

President Biden has been a strong proponent of labor unions, and he has emphasized that his Administration will support worker-centric trade policies that protect and empower workers. This goal goes hand-in-glove with the Biden Administration’s goals to make the United States a leader in clean energy, including solar power, and President Biden has emphasized that investment in solar energy will create millions of good-paying jobs. Our union members have seen this firsthand, and we support continued investment in solar projects that provide well-paid solar jobs. Imports of CSPV cells and modules are critical to maintain a stable supply of materials and to ensure that the U.S. solar industry continues to thrive – and that the Biden Administration meets its clean energy goals. By targeting the vast majority of CSPV cell and module imports into the United States, the requested anti-circumvention inquiries could threaten existing and future solar projects that rely on imports, and by extension the well-paid solar jobs that these projects create.

We therefore strongly urge you to dismiss Auxin Solar’s request and decline to initiate this harmful action that will harm U.S. union workers.

Sincerely,

Thomas Flynn,
General Secretary-Treasurer