

## EXECUTIVE SUMMARY

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The solar industry supports efforts to secure a more stable supply-chain for important Rare Earth Minerals as well as other critical materials. According to the U.S. Department of Energy's Critical Materials Strategy report, there are several critical materials that are crucial to the development of solar technologies. Although used in small amounts, Rare Earth Minerals and other critical minerals are an essential element to the development and manufacturing of solar technologies. Due to this factor, and the current lack of viable alternatives, Rare Earth Minerals and other critical minerals are essential to the production of solar technologies.

Generally, SEIA is supportive of the draft bill. Our specific comments are outlined below.

**§2(2)**

- The definition of “clean energy technology” should include the following text: “including those related to wind, solar, hydropower, and geothermal energy, batteries, and other energy storage devices”. Including this language in the definition would remove the need to use it in other provisions of the text.

**§2(4)(A)**

- Should clarify only those manufacturing processes that *use* Critical Minerals.

**§2(4)(C)**

- What is the definition of “value-added”?

- Should expand this provision to include all manufacturing. *All* manufacturing processes which use Critical Minerals should be included in this provision and thus protected by the language of the bill.

**§101**

- To qualify as a “critical mineral” a mineral/material must be either:

1. A “Rare Earth Element” (as defined by the current text as those elements in the periodic table atomic number 57 through 71, plus yttrium and scandium) OR
2. A mineral designated as a critical mineral through the regulatory process/methodology defined by §101 of the current draft.

Thus, all “Rare Earth Elements” would automatically be defined as “critical minerals” and other materials must be designated as such through the regulatory process.