November 27, 2023

Tricia Van Orden
Designated Federal Officer
President's Export Council, Room 3424
1401 Constitution Avenue NW
Washington, DC 20230

Subject: Meeting of the President's Export Council

Reference: 2023-25019

Ms. Orden,

The Aerospace Industries Association (AIA) and its nearly 330 member companies welcome the opportunity to provide recommendations to the President's Export Council (the Council) on promoting the expansion of U.S. exports. AIA represents aerospace and defense (A&D) companies ranging from small suppliers to large original equipment manufacturers (OEMs). In 2022, our industry exported $104.8 billion of goods, and the sector continues to serve as a symbol of global innovation and manufacturing prowess.

Our members are proud to advance U.S. interests abroad by producing innovative and critical products, parts, components, and technologies for export. Overall, the A&D sector contributes to U.S. global leadership through its wide range of product portfolios and technology development. U.S. exports of these products promote cooperation with allies and partners and advance regional stability by contributing to commercial aviation safety efforts and broader national security cooperation objectives.

It is through this lens that AIA recommends that the Council focus on securing global supply chains, ensuring access to critical minerals, and creating a permissive regulatory environment for emerging and advanced capabilities as central components of its 2024 efforts to ensure U.S. competitiveness abroad. These challenges will persist over the next decade as industry adjusts to ongoing geopolitical dynamics and unforeseen global events.

- **Global Supply Chains:** The U.S. needs resilient, diverse, and secure supply chains to support its national security and economic objectives. Increased geopolitical tensions in the Indo-Pacific, conflicts in Europe and the Middle East, and resulting economic disruptions highlighted the global nature of critical supply chains and revealed longstanding vulnerabilities. Senior government officials should remain focused on developing and expanding policies that enable a better understanding of the U.S. industrial base, proactively reduce trade dependencies on adversarial countries, and promote investment in U.S. capacity.

- **Critical Minerals:** Modernization of commercial and defense capabilities has rapidly increased the demand for critical minerals and elevated market access as a top national security priority. Volatile and non-transparent global markets, uneven concentrations of geologic sources, foreign ownership concerns, and environmental, energy, and labor-intense production processes continue to stress supply chains and encumber American
industry access to these key materials. Given the shared supply chain between commercial and defense industries, recent disruptions to the commercial aviation market have had downstream effects on the defense operations of many AIA members. Legislative and regulatory restrictions on the sourcing of critical minerals must reflect the realities of today’s global markets. Policymakers should evaluate the unique nature of A&D supply chains; continue elevating critical minerals as a national security priority; leverage global partnerships; and consider incentives for building reliable domestic access when assessing new policies and regulations.

- **Emerging and Advanced Capabilities:** The A&D industry is at the forefront of emerging and advanced capabilities. The industry wants to partner with U.S. government in developing policies and regulatory frameworks for new capabilities – particularly, the ways in which defense and technology trade, exports, and related cooperation will be governed moving forward. Each of these technologies and capabilities face complex international export control and trade challenges, some shared and others unique to the technology in question. In policy and practice for both the United States and our allies and partners, sharing and cooperating on emerging and advanced capabilities is complex and require consideration at the highest level of the U.S. government to sustain U.S. technological leadership and enhance export competitiveness.

Thank you again for the opportunity to comment on the Council’s export competitiveness agenda. AIA and its members look forward to continuing close collaboration with the Council on these matters. If you have any questions or require additional information, please contact my staff lead for this matter, Emma Hamilton (emma.hamilton@aia-aerospace.org).

Sincerely,

Derek “Dak” Hardwick  
Vice President, International Affairs  
Aerospace Industries Association