

DRAFT RECOMMENDATION LETTER (DELIBERATIVE, FINAL VERSION FORTHCOMING AND TO BE SUBMITTED TO SECRETARY OF COMMERCE HOWARD LUTNICK)

The Honorable Howard Lutnick
Secretary of Commerce
U.S. Department of Commerce
1401 Constitution Avenue, NW
Washington, DC 20230

Subject: Urgent Action Needed to Stabilize Global Tungsten, AMT, and APT Supply Chains

Executive Summary

The Environmental Technologies Trade Advisory Committee (ETTAC) submits this recommendation to address the severe instability of the tungsten market, including Ammonium Metatungstate (AMT) and Ammonium Paratungstate (APT)— as Tungsten in various forms is a critical material for U.S. and environmental-technology industries, as well as U.S. aerospace and defense industries. The U.S. does not currently mine tungsten commercially; the last domestic mine closed in 2015.

China's tightening export controls has reduced the availability of refined tungsten products causing severe price escalation, and supply shortages, resulting in significant strategic and commercial vulnerability. These disruptions threaten U.S. national security, undermine domestic clean-air compliance for power growth, and erode the competitiveness of U.S. environmental-technology exporters.

ETTAC urges the Department of Commerce to take immediate and urgent action to stabilize supply, diversify global sources, and support domestic and allied-nation production.

Background

Tungsten is on the 2025 US Critical Minerals list essential to aerospace and defense systems (high-temperature alloys, penetrators, turbine components), environmental technologies and utilized by power companies and data centers for growth, semiconductors, advanced coatings, and precision manufacturing. Specifically Tungsten is used in industries and products such as Selective Catalytic Reduction (SCR) catalysts for emissions control, in drill bits, which can be used for water well drilling; carbide mechanical seals are used in grinders, pulverizers, and shredders used for municipal solid waste; in radiation shielding in nuclear waste management and trioxide (WO_3) is a visible-light-active photocatalyst used in advanced oxidation processes (AOPs) to

DRAFT RECOMMENDATION LETTER (DELIBERATIVE, FINAL VERSION FORTHCOMING AND TO BE SUBMITTED TO SECRETARY OF COMMERCE HOWARD LUTNICK)

degrade persistent organic contaminants in water. Because of widespread use across sectors, lack of Tungsten availability could present an operational risk across infrastructure systems.

AMT and APT are the primary refined intermediates used to produce tungsten oxides, carbides, SCR catalysts and other environmental products. The U.S. relies heavily on imports, with China historically supplying the majority of global refined tungsten. Substitutes are not readily available.

Issue: Global Supply Contraction and Price Escalation

Over the past 18 months, China has imposed stricter export licensing, reduced export quotas, and implemented administrative delays affecting APT and AMT shipments. These actions have significantly tightened global supply and increased market prices.

Price Trends (Approximate Market Data)

- APT prices have risen from ~\$300/mtu WO₃ in mid-2024 to \$3000/mtu WO₃ by mid 2026, an increase of ~ 1000%.(footnote 1)
- AMT prices have followed similar trajectories, with U.S. buyers reporting spot increases exceeding 1000% increases as well.
- Lead times have expanded from 4–6 weeks to 12–20 weeks, with some suppliers declining new orders.

Impact on U.S. Industry

- Defense contractors face rising costs and procurement delays for tungsten-based components.
- SCR catalyst manufacturers face material shortages, jeopardizing power growth in AI and Datacenters.
- U.S. technology exporters are losing competitiveness to foreign firms with better access to Chinese supply.
- U.S. manufacturers report that tungsten instability is now among their top three supply-chain risks.

Supply Developments and Recycling Opportunities

Several U.S. domestic projects are in evaluating the potential of restarting or expand U.S. tungsten mining but face challenges in capital access, permitting timelines, and refining capacity.

There are also a wide range of US Midstream Tungsten processors and manufacturers who could expand capacity to benefit and grow domestic supply in the USA to convert tungsten concentrates into intermediate products like ammonium paratungstate (APT),

DRAFT RECOMMENDATION LETTER (DELIBERATIVE, FINAL VERSION FORTHCOMING AND TO BE SUBMITTED TO SECRETARY OF COMMERCE HOWARD LUTNICK)

tungsten oxides, metal powders, carbides, mill products (rod, wire, sheet), and alloys for defense, aerospace, and industrial tooling.

Because of the lack of US mining, recycled tungsten is the single most important domestic source, accounting for roughly 30–35% of U.S. tungsten consumption. Technical investment focus on expanding US scrap utilization of reclaim of carbide cutting tools, various steel components and manufacturing wastes is a priority.

Korea, Vietnam and other emerging producers hold significant tungsten reserves but need investment in refining and export infrastructure. Australia, Kazakhstan, Canada and EU partners are also potential contributors to supply diversification.

Recommendations to the Secretary of Commerce

1. Facilitate Increasing Tungsten Imports from Partners/Allies, versus current dominant sources, to Restore Predictable Critical Material Flows

- Request transparency on worldwide supply and export licensing for APT and AMT.
- Encourage stable, rules-based export availability for environmental and defense applications.
- Utilize existing trade dialogues to reduce administrative barriers.

2. Prioritize Tungsten in Critical-Mineral and Supply-Chain Security Programs

- Reaffirm tungsten's status as a critical mineral across Commerce, DOE, and DOD programs.
- Expand federal support for domestic refining and processing as well as recycling tungsten to expand capacity in the US to move those industries outside of China.
- Coordinate with defense procurement to ensure long-term demand signals.

3. Accelerate Non-Chinese Mining and US Midstream Manufacturing and Refining Projects

- Support US focused companies through Export-Import Bank financing, Development Finance Corporation tools, federal loan guarantees, and permitting assistance.
- Encourage long-term offtake agreements between U.S. manufacturers and emerging producers.

DRAFT RECOMMENDATION LETTER (DELIBERATIVE, FINAL VERSION FORTHCOMING AND TO BE SUBMITTED TO SECRETARY OF COMMERCE HOWARD LUTNICK)

- Support US Midstream processors and manufacturers with investments in increased capacity for tungsten raw materials, like AMT and other specialty products

4. Build International Partnerships to Expand Global Tungsten Supply

- Engage relevant countries, such as Vietnam, South Korea, Australia, Canadian and EU partners to coordinate investment in tungsten mining and refining.
- Support joint ventures that increase global AMT/APT production capacity.
- Facilitate joint US industry partnerships for tungsten users and suppliers to address priorities and eliminate bottlenecks.

Request for Response

ETTAC has identified Critical Minerals as a priority for US industry as previously highlighted in our Recommendation 2025-3: Bolstering U.S. Supplies of Critical Minerals and respectfully requests a formal written response from the Secretary of Commerce and a proposed action plan detailing how the Department will address Chinese export restrictions, support non-Chinese Tungsten and other Critical Mineral production (including reclaim/recycling), strengthen U.S. supply-chain resilience, and coordinate interagency and international efforts.

Footnote 1 – APT Index from Fast Markets, MB-W-001, Tungsten APT 88.5% WO3 min cif Rotterdam and Baltimore duty-free, \$/mtu WO3