

February 2, 2023

The Honorable Deb Haaland  
Secretary of the Interior  
1849 C Street NW  
Washington, DC 20240

Dear Madam Secretary:

**We, the undersigned users, consumers, partners and supporters of the copper industry write to urge you to formally designate copper as an official USGS Critical Mineral without delay.** While we believe that copper has always been critical to our national security, water infrastructure, and electrical and clean energy infrastructure, recent significant increases in the supply risk have made its immediate inclusion on the critical mineral list necessary.

With the release of the draft 2021 list, a new qualitative methodology was created to look more closely at a supply risk score by calculating the economic vulnerability, disruption potential, and trade exposure of various minerals. Unfortunately, USGS stopped counting with 2018 data. Since 2018, the risks to copper from imports have increased dramatically. The share of copper consumption that is met by net imports has increased from 33% in 2018, to 44% in 2021 and 41% in 2022.

Recently, the Copper Development Association (CDA) hired an analyst to update copper's supply risk score with the recently available data through the first half of 2022.<sup>1</sup> With the new data, copper's supply risk score in 2022 is up to 0.423 and the 4-year weighted average score is now up to 0.407 – both above the USGS 0.40 threshold for automatic inclusion on the list.

	2015	2016	2017	2018	2019	2020	2021	2022 FY Est.	2022 H1
Economic Vulnerability	0.932	0.921	0.933	0.922	0.931	0.933	0.978	0.968	0.968
Disruption Potential	0.103	0.101	0.145	0.119	0.141	0.146	0.161	0.163	0.163
Trade Exposure	0.309	0.307	0.380	0.318	0.367	0.367	0.493	0.477	0.479
Annual Supply Risk	0.310	0.306	0.372	0.327	0.364	0.368	0.427	0.422	0.423
Recency Weighted Four Year Supply Risk				0.334	0.349	0.359	0.387	0.407	0.407

Given the significant change in the supply risk to copper, which shows no signs of slowing down, we urge you to exercise the authority given to you by statute to officially add copper to the list immediately, without waiting for the next update in 3 years. This is a commitment USGS made in writing earlier this year, saying "If the criticality status of a mineral commodity were to change significantly in the near term, the USGS would publish information on the changed circumstances without waiting for a 3-year update cycle." Clearly, this dramatic rise in the supply risk score is such an incident that requires immediate attention.

<sup>1</sup> [https://copper.org/copperiscritical.org/report/CDA\\_Copper\\_Critical\\_Mineral\\_full\\_report.pdf](https://copper.org/copperiscritical.org/report/CDA_Copper_Critical_Mineral_full_report.pdf)

This designation will significantly benefit and protect the United States as we continue to substantially invest in a variety of copper intensive applications. By recognizing copper as a “critical mineral,” the United States’ federal government can more effectively ensure a secure and reliable supply of domestic copper resources in the years to come.

***Given copper’s major role in state and national economic development, national security, and infrastructure, we strongly reiterate our recommendation that copper be immediately included in the USGS list of “critical minerals”.***

Thank you for your thoughtful consideration of this request.

Sincerely,

**Associations and Unions**

American Foundry Society (AFS)  
American Supply Association  
Arizona Mining Association  
Business Council for Sustainable Energy (BCSE)  
Copper & Brass Supply Chain Association (CBSCA)  
Empire Clean Cities  
Electric School Bus Coalition (ESBC)  
Greater Boston Plumbing Contractors Association  
International Code Council (ICC)  
National Electrical Manufacturers Association (NEMA)  
National Mining Association (NMA)  
New Mexico Mining Association  
Non-Ferrous Founders' Society (NFFS)  
North American Metals Council (NAMC)  
PHCC of California  
Plumbing Manufacturers International  
Plumbing-Heating-Cooling Contractors-National Association  
Precision Machined Products Association  
Precision Metalforming Association  
The International Association of Plumbing and Mechanical Officials (The IAPMO Group)  
Treated Wood Council  
United Association of Plumbers and Pipefitters of the United States and Canada  
Zero Emission Transportation Association (ZETA)  
U.S. Chamber of Commerce

**Industry**

Acronis SCS  
Action Plumbing and Heating  
Alconex Specialty Products, Inc.  
AMES Copper Group  
Amity Die & Stamping LLC  
Arizona Sonoran Copper Company  
Aurubis Buffalo, Inc.  
Aviva Metals, Inc.  
Bunting Bearings LLC  
Cambridge-Lee Industries, LLC  
Carter Alloys Company

Christymetals  
Cocalico Plumbing & Heating  
Concast Metal Products Co.  
Copperweld  
Dolan Inc.  
Eaton  
Farmers Copper Ltd  
Fortress Wood Products  
Freeport-McMoRan Inc.  
Great Lakes Copper  
Greenwood Fabricating & Plating  
Heliox  
Hussey Copper  
IMC MetalsAmerica  
IWG Owl Wire  
Keats Mfg. Co.  
Kenmode Tool and Engineering  
Materion Corporation  
Midwest Transportation, LLC  
Miles Chemical  
Molex  
Morgan Bronze Products, Inc.  
Mueller Brass Co  
Mueller Industries, Inc.  
Mueller Streamline Co.  
New England Trading Global  
Prime Materials Recovery, Inc.  
Revere Copper Products, Inc.  
Rio Tinto America  
S+S Industries  
SDI LaFarga COPPERWORKS  
SEA Electric  
Southwire Company LLC  
Stanley Spring & Stamping Corp.  
thyssenkrupp materials  
Titan International, Inc.  
U.S. Brass & Copper  
Viega LLC  
Wieland  
Zenobe