Congress of the United States
Washington, DC 20515

February 2, 2023

The Honorable Deb Haaland
Secretary
United States Department of the Interior
1849 C Street, N.W.
Washington, DC 20240

Dear Secretary Haaland:

We write to request your assistance to formally designate copper as a critical mineral by the United States Geological Service (USGS). As our country makes new investments in infrastructure, advanced technology, and electrical and clean energy sectors, copper is becoming more valuable to our future, sustainable economic growth. Since these new supply chains are central to our country's competitiveness in the face of rising global threats, this designation is also a natural security imperative.

As you know, in 2021, USGS released a draft critical minerals list, but excluded copper. We appreciate the important considerations your department must consider when developing this list, given the implications it has on the natural resources of our country. It is our understanding, though, that copper's exclusion on this list occurred at least partly because the agency considered 2018 data, not taking into account more recent conditions and fluctuations to factors like economic vulnerability, the potential for supply disruption, and exposure to trade fluctuations in the post-pandemic world.

We are concerned that, as significant trade fluctuations have taken place since 2018, the risk score did not take that volatility into account. In fact, since 2018, the supply risks to copper have increased due to a greater reliance on imports. The share of domestic copper consumption met by net imports has increased from 31% in 2016 to 49.3% in 2021. And in 2022, the net import reliance stood at 48%. Much imported copper arrives from Russia, China, Iran and North Korea, countries that now account for half of all non-U.S. global refined copper production.

It is further our understanding that, based upon outside analysis which considers these aforementioned factors, if the USGS used the most recently available data from 2022, the supply risk score for copper would increase to a level where it would warrant inclusion as a critical mineral.[1]

Given the significant and continued negative change in the potential supply risk of copper, we urge you to exercise your statutory authority to immediately reconsider adding copper as a critical mineral. 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."[2]

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[1] Ian Littlewood. 2022. *Copper's Updated Critical Mineral Supply Chain Calculations*. P.3
[2] Letter from USGS Associate Director for Energy and Mineral Resources to Utah Governor Spencer Cox, June 23, 2022.

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Your department's immediate reconsideration of copper as a critical mineral, if concluding that its inclusion is warranted, would significantly benefit our country as we continue to substantially invest in a variety of copper-intensive applications. By recognizing copper as a "critical mineral," the federal government can more effectively ensure a secure and reliable supply of domestic copper resources in the years to come. As Members of Congress whose districts include manufacturing facilities that are copper-intensive and essential to the future of our economy's transition, such a designation would help secure the economic future of these facilities and these communities.

Thank you for your consideration of this request. Given copper's major role in our local economies and national economic development, national security, and infrastructure, we strongly reiterate our recommendation that your department immediate re-consider the inclusion on the USGS list of "critical minerals".

Sincerely,

Robert E. Latta
Member of Congress

Brian Higgins
Member of Congress