



August 5, 2025

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

Dear Secretary Burgum:

I write to you again from the Copper Development Association (CDA), the North American based not-for-profit association of the copper industry, bringing together the North American copper and copper alloy semis fabricators and global copper mining and production industries. I'd like to follow up on my letter of March 10<sup>th</sup> with new data supporting our belief that copper belongs on the United States Geological Survey (USGS) Critical Mineral list – set to be released this year.

Copper is inextricably linked to America's most pressing policy objectives, particularly national security, energy dominance and global A.I. leadership. From powering data centers to augmenting energy supplies to enabling advanced technology vital to the defense industrial base, copper and the domestic copper industry are strategic assets to America's national security, geopolitical standing, and economic interests. Unfortunately, imports continue to grow unabated, as does the share of global refined copper production in adversarial countries.

***But don't just take my word for it! Here is what President Trump correctly proclaimed last week after a review of the 232 investigation into copper imports:***

- ***“Copper is being imported into the United States in such quantities and under such circumstances as to threaten to impair the national security of the United States.”***
- ***“Copper is essential to the manufacturing foundation on which United States national and economic security depend.”***
- ***“A single foreign country [China] dominates global copper smelting and refining, controlling over 50 percent of global smelting capacity and holding four of the five largest refining facilities.”***
- ***“Unfair trade practices abroad... have caused the United States to be overly reliant on foreign copper imports. Foreign competitors leverage state subsidies and overproduction to flood international markets with artificially low-priced copper products.”***
- ***“The Secretary found that United States dependency on foreign sources of copper is a national security vulnerability that could be exploited by foreign countries, weakens United States industrial reliance, exposes the American people to supply chain disruptions, economic instability, and strategic vulnerabilities, and jeopardizes the United States defense industrial base.”***

The President is right, and while his 232 tariffs go a long way to support domestic manufacturers of semi-finished and downstream copper derivative products, upstream copper

mining, refining, and smelting operations still face significant challenges and increasing imports without the crucial government support that the Critical Minerals designation would provide. Now is the time for USGS and DOI to “finish the job” and support the domestic upstream copper industry by including copper on the 2025 Critical Minerals list.

Even under USGS’s 2022 methodology, copper’s supply risk score through 2024 has skyrocketed to a four-year weighted average of .457 (the score should actually be even higher as 2024 “Disruption Potential” data excluded China) – far above the .40 threshold for the 2022 list. The data is crystal clear – we must act now!

	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024
Economic Vulnerability	0.932	0.921	0.933	0.922	0.931	0.933	0.978	0.971	0.966	0.978
Disruption Potential	0.103	0.101	0.145	0.119	0.140	0.145	0.160	0.265	0.292	0.193
Trade Exposure USGS methodology inc scrap	0.317	0.296	0.363	0.333	0.368	0.378	0.444	0.406	0.411	0.449
<b>Geometric mean</b>	<b>0.312</b>	<b>0.302</b>	<b>0.366</b>	<b>0.332</b>	<b>0.364</b>	<b>0.371</b>	<b>0.411</b>	<b>0.471</b>	<b>0.488</b>	<b>0.439</b>
<b>Recency weighted score</b>				<b>0.334</b>	<b>0.348</b>	<b>0.360</b>	<b>0.381</b>	<b>0.422</b>	<b>0.456</b>	<b>0.457</b>

Thank you for your consideration of this request and please feel free to reach out to me or anyone on my team with any questions. Given copper’s major role in our local economies and national economic development, national security, and infrastructure, we strongly reiterate our recommendation that you amplify President Trump’s section 232 proclamation and include copper on the 2025 USGS list of “Critical Minerals”.

Sincerely,



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