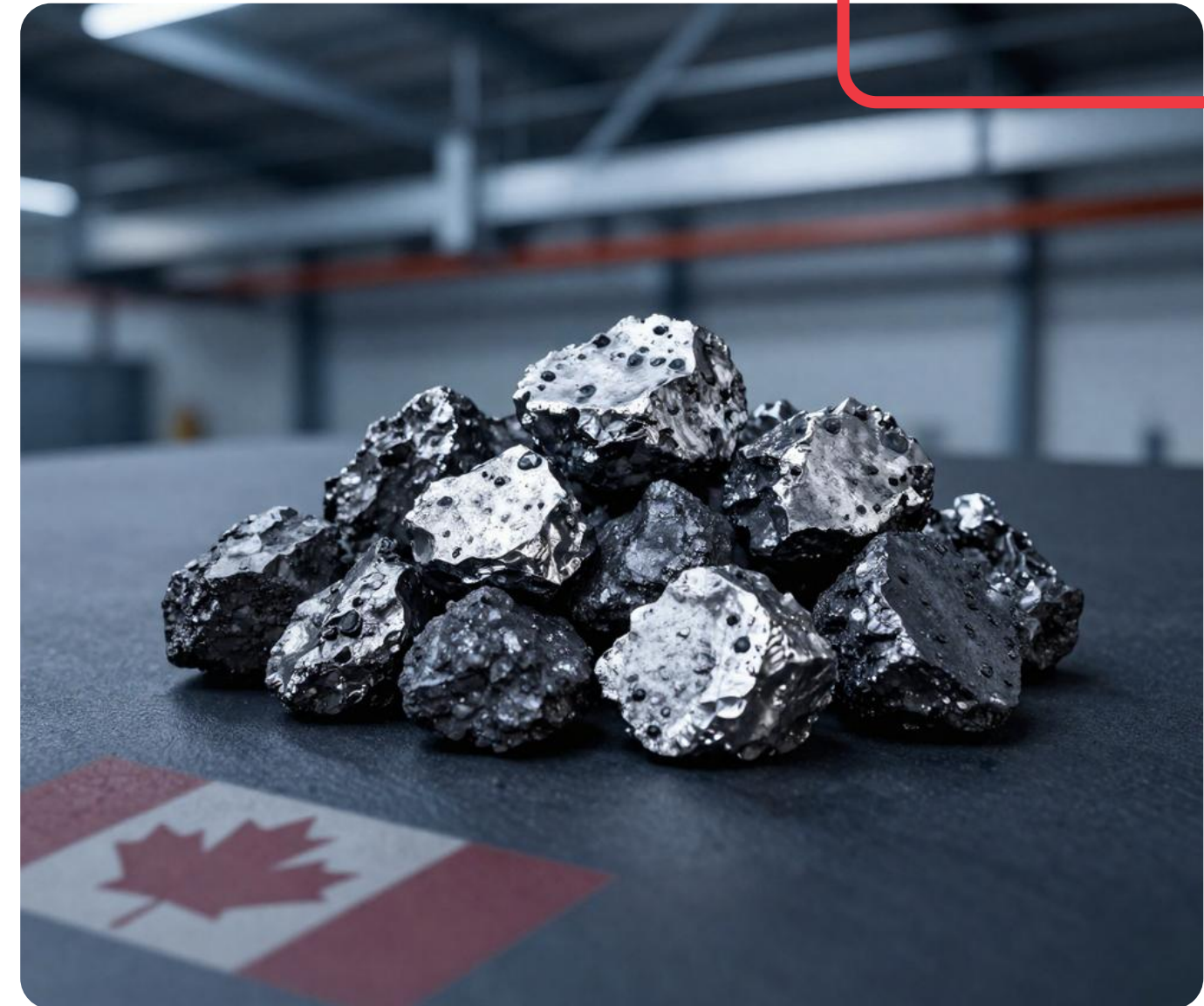


August 2026

METALLURGICAL COAL AS A CANADIAN CRITICAL MINERAL

S U B M I S S I O N

*Final Submission to the Updated
Canadian Critical Minerals Strategy*



COAL
ASSOCIATION
OF CANADA



Canada Already Has the Advantage

Canada has an opportunity to build on its existing resource strengths as it seeks to increase domestic production of strategic materials, strengthen economic and national security, secure critical supply chains and become a more reliable supplier to its allies. These priorities are central to the Government of Canada's current review and have become increasingly important as geopolitical uncertainty, changing markets and growing defence requirements reshape global demand for essential raw materials.

Recognizing metallurgical coal as a critical mineral would build on an existing Canadian strength while advancing the broader objectives of the Updated Canadian Critical Minerals Strategy: strengthening domestic production, protecting strategic supply chains and positioning Canada as a reliable supplier of the strategic resources required by Canada and its allies.

Domestic production

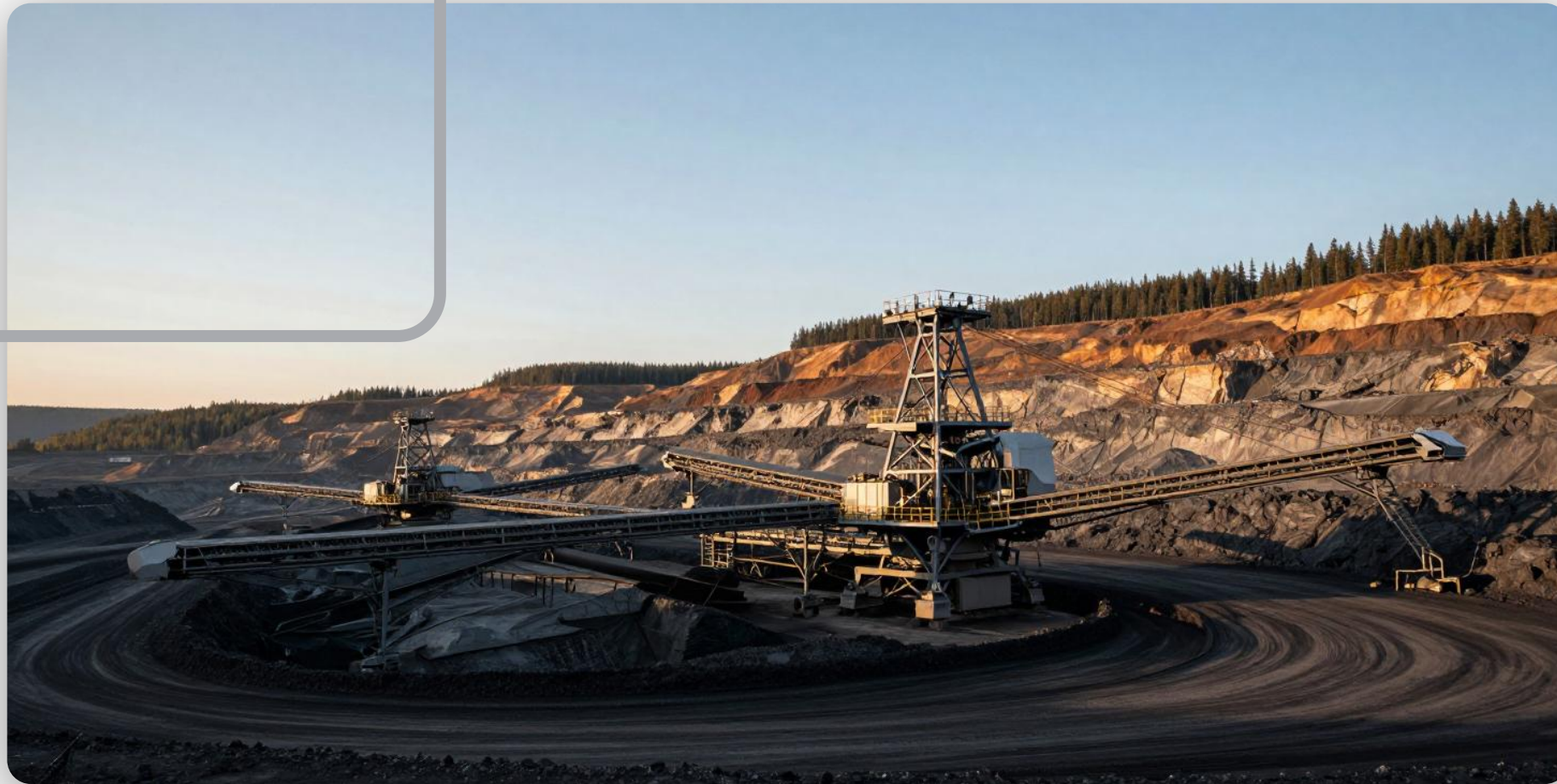
Canada already produces metallurgical coal at globally significant scale and has the resources, expertise and infrastructure required to maintain and responsibly expand that production.

Economic and national security

Metallurgical coal is an essential raw material for primary steelmaking, linking it directly to industrial capacity, critical infrastructure and defence supply chains

Strategic partnerships

Canada is well positioned to provide allies and trading partners with a secure, reliable and responsibly produced supply of high-quality metallurgical coal from an established Canadian industry.



Metallurgical Coal Meets Canada's Critical-Mineral Test

Metallurgical coal meets both threshold criteria and clearly satisfies at least two of the additional conditions: it is essential to Canada's economic and national security and would position Canada as a sustainable and strategic partner within global supply chains.

Domestic production at scale

Canada produced 28.5 Mt of metallurgical coal in 2024, with 29 Mt exported at an \$8.9B value. Established mines, workforce, rail networks and port infrastructure confirm production at industrial scale — a foundational criterion for critical-mineral designation.

Economic & national security

Metallurgical coal underpins primary steelmaking, which is essential to construction, manufacturing and national infrastructure. Its economic contribution and role in securing domestic industrial capacity directly satisfy Canada's economic and national security criteria.

Strategic supplier to allies & supply-chain vulnerability

Canada supplies metallurgical coal to key allied nations. Coal grades are not fully interchangeable, making reliable, high-quality supply critical. Concentration of global supply in few regions creates vulnerability — Canada's stable, democratic production directly addresses allied supply-chain resilience needs.

Steel, Defence and Policy Consistency

High-purity iron ore is already designated a Canadian critical mineral. Metallurgical coal is the other principal mined input for primary steelmaking — and Canada's Defence Industrial Strategy identifies steel as essential to defence supply chains. Approximately 70% of global steel is produced via blast furnace–basic oxygen furnace processes that require metallurgical coal.

Metallurgical coal supply chains face strategic vulnerabilities

Metallurgical coal supply chains face strategic vulnerabilities because steelmaking requires specific coal grades and blends that cannot always be easily substituted.

Canada can reduce this risk by maintaining and responsibly developing domestic production, strengthening and diversifying the supply of an essential steelmaking material from a stable, established source.

Metallurgical coal supports Canada's national security and Defence Industrial Strategy

Canada's Defence Industrial Strategy identifies steel as essential to defence supply chains. Steel cannot be considered strategically secure while the supply of the raw materials required to produce it is overlooked.

Metallurgical coal is one of those materials and remains central to the predominant method of primary steelmaking globally.



Supply-Chain Resilience and Allied Opportunity

Metallurgical coal grades are not fully interchangeable. Reliable supply depends on quality, infrastructure, and international trade relationships — making strategic sourcing a national priority.



Criticality should reflect current and foreseeable supply requirements

Critical-mineral designation should assess supply-chain importance and vulnerability based on current and foreseeable requirements, while allowing the Strategy and Critical Minerals List to adapt as technologies and markets evolve.

Other nations recognize the strategic risk

The U.S. added metallurgical coal to its final 2025 list, while India designated coking coal a critical and strategic mineral in January 2026.

Canada can diversify allied supply

Canada exports metallurgical coal to allied nations across Asia and Europe. With established mines, rail corridors, and Pacific port capacity, Canada is uniquely positioned to strengthen allied supply chains and reduce dependence on non-allied sources.

Innovation Where It Matters Most

The Coal Association of Canada and its members are committed to practical, science-driven environmental innovation — advancing solutions that protect ecosystems while sustaining responsible metallurgical coal production.

Economic and Indigenous opportunities

The coal industry supports employment, businesses, rail and port infrastructure and government revenues, particularly in Western Canada.

Future development can build on this established economic base while creating further opportunities for Indigenous equity participation, employment, procurement and long-term partnerships, consistent with rights-holder priorities. This distinguishes metallurgical coal from resources for which Canada must first develop the production capacity, workforce and infrastructure required to become a meaningful global supplier.



Selenium & Water Management

Selenium management and mine-water treatment are priority areas. Industry is investing in advanced treatment technologies, prevention monitoring systems, and water reuse and recycling programs to reduce environmental impact at operating mine sites.

Recommendations



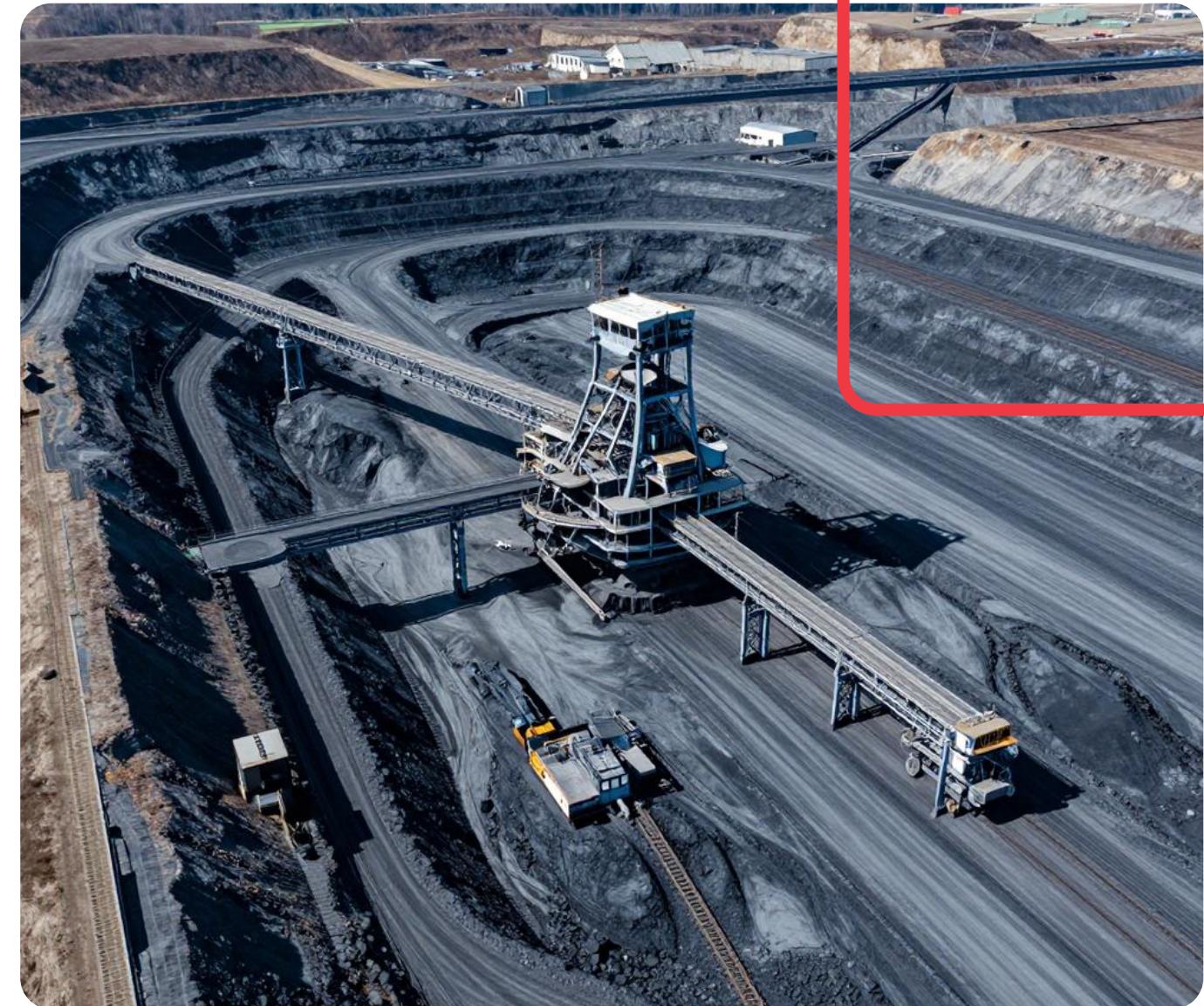
Coal Association of Canada

Canada does not need to create a metallurgical coal industry to realize this strategic opportunity; it already has the resources, production, workforce, infrastructure and global customers.

Designating metallurgical coal as a Canadian critical mineral would build on an existing Canadian strength, better align Canada's critical-minerals and defence-industrial policies, and support economic security, defence readiness and more resilient supply chains for Canada and its allies.

- 01 Add metallurgical coal to Canada's Critical Minerals List**
Recognizing its importance to primary steelmaking, economic security, national defence and allied industrial supply chains.
- 02 Explicitly recognize metallurgical coal in the Updated Canadian Critical Minerals Strategy**
As a strategic steelmaking raw material and a contributor to Canadian and allied supply-chain resilience.
- 03 Include metallurgical coal projects in appropriate federal critical-minerals programs, infrastructure initiatives and investment mechanisms**
Subject to the same eligibility criteria and regulatory requirements that apply to other designated critical minerals.
- 04 Integrate metallurgical coal into Canada's critical-mineral diplomacy and allied supply-chain partnerships**
Including engagement with the United States and other strategic steel-producing partners
- 05 Coordinate Natural Resources Canada's critical-minerals policy with Canada's Defence Industrial Strategy**
Ensuring that Canada's strategy for securing steel addresses the security and availability of the raw materials required to produce it.

Contact Us



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