



OECD Contributions to Securing Critical Mineral Supply Chains

5 Business Recommendations on the OECD Zero Draft (C(2026)120)

5 October 2026

Business at OECD (BIAC) strongly supports the OECD's efforts to further develop effective, coherent *OECD Contributions to Securing Critical Mineral Supply Chains*. In this regard, the recent OECD 'Zero Draft' responds to the private sector's call for an *OECD Critical Minerals Action Plan*, voiced at *Business at OECD's Annual Consultation with the OECD Secretary-General and Council*, as well as at the OECD Critical Minerals conference in Istanbul. This initiative should serve as a practical, focused coordination tool to bring coherence to OECD work and messaging, in cooperation with the IEA.

From a business perspective, the *Zero Draft* includes many important points, however, the OECD's efforts will ultimately not be judged by the number of studies produced, but by their concrete impact and whether it helps unlock additional investment, capacity and diversification on the ground and in the near term. Therefore, we encourage stronger focus on advancing those practical conditions that determine whether projects are financed, built and brought into production by the private sector. Our priorities paper [Critical Minerals, Critical Partnerships](#) and the [B7 Joint Communiqué](#) provide specific advice, reflected in the 5 recommendations below.

The OECD's balanced, structured and continuous engagement with the private sector through *Business at OECD* (BIAC) remains one of the Organization's unique strengths and should be duly recognized in the strategy. As public-private sector partnerships is one of the [Keys to Resilient Supply Chains](#), we look forward to continuing our engagement to ensure that OECD analysis translates into practical outcomes.

1. Put Project Delivery More at the Centre

Business needs projects to move from concept to operation. Diversification will not be achieved unless new mining, processing, refining, recycling and supporting energy infrastructure can be developed faster and at greater scale. The Zero Draft correctly identifies supply concentration and underinvestment challenges. However, the OECD contribution remains stronger on identifying barriers than on supporting governments in overcoming them. The OECD should:

- Develop practical guidance on efficient, transparent and predictable permitting regimes for critical mineral projects.
- Assess how energy costs and energy infrastructure affect the competitiveness of critical mineral extraction, processing and refining activities and appropriate responses.
- Identify policy and regulatory bottlenecks delaying mining, processing, refining and recycling investments across OECD economies. The Semicon Atlas is an interesting initiative.

2. Strengthen Investment, Bankability and a Pro-Growth Tax Agenda

Business needs commercially viable projects, predictable investment frameworks and long-term confidence that investments can generate sustainable returns. The draft appropriately emphasizes export credits, blended finance and tax issues, but remains relatively weak on project bankability and investment competitiveness. The OECD should:

- Accelerate development of the proposed OECD Policy Framework for Mineral Investments and make investment competitiveness a central objective.
- Assess how evolving international tax frameworks, including the Global Minimum Tax, affect critical minerals investment and identify approaches that preserve investment incentives.
- Develop recommendations on how export credits, guarantees, blended finance and long-term offtake arrangements can be combined to improve project bankability.

3. Focus on Responsible Business Incentives

The OECD private sector leads on responsible business conduct and due diligence, which must remain practical and implementable. At the same time, responsible production must be rewarded if higher-standard projects are to attract investment and remain commercially competitive. The draft emphasises due diligence, traceability and transparency, but pays less attention to market incentives, and how business expectations and obligations impact commercial outcomes. The OECD should:

- Explore the link between market approaches and responsible production and sourcing.
- Reduce duplication and compliance costs by promoting interoperability between traceability, certification and responsible sourcing systems.
- Strengthen capacity-building across supply chains to support practical implementation.

4. Deepen Work on Market Distortions, Price Formation and Competitiveness

Business needs investment signals that support diversification. Long-term demand alone is insufficient if market distortions undermine project economics and discourage investment. The draft's treatment of export restrictions, industrial subsidies and non-market practices is among its strongest elements and builds on unique OECD expertise. The OECD should:

- Expand work on how subsidies, strategic overcapacity, export restrictions and non-market practices affect project viability and investment decisions.
- Translate OECD analysis of price formation and market distortions into practical policy recommendations that support diversification and investment.
- Develop policy recommendations that help governments counter distortions while supporting commercially viable diversification and competitiveness.

5. Make Circularity a Practical Supply Security Tool

Business increasingly views recycling and secondary materials as a critical source of supply diversification and resilience. This requires efficient cross-border recycling markets and predictable regulatory frameworks. The draft contains a welcome focus on circularity but pays relatively limited attention to the practical barriers currently affecting secondary material flows. The OECD should:

- Improve implementation of the legally binding OECD Decision on the Control of Transboundary Movements of Wastes Destined for Recovery.
- Develop recommendations to harmonise waste classifications, notification procedures and recycling-related requirements across OECD economies.
- Identify and remove unnecessary barriers affecting the movement of recyclable materials and secondary feedstocks across OECD economies.