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METAL MINERALS - CHANGING SPECIFICATIONS FOR DOMESTIC PROCESSING & REFINING [1][2][3][4][5]

INTRODUCTION

Indonesia's Minister of Energy & Mineral Resources ("**MoEMR**") has recently issued a new regulation (MoEMR Regulation No. 8 of 2015 re Amendment of MoEMR Regulation No. 1 of 2014 re Increasing Added Value of Minerals through Domestic Processing & Refining Activities ("**MoEMRR 8/2015**")).

MoEMRR 8/2015 makes various changes to the minimum processing and refining specifications that have to be satisfied in respect of certain metal minerals before they can be exported from Indonesia.

Of particular interest is that, in the case of Bauxite, MoEMRR 8/2015 recognizes, for the first time, a new intermediate product that may be exported by Bauxite producers in lieu of chemical grade and smelter grade Alumina.

MoEMRR 8/2015 is to be welcomed as indicating a greater willingness on the part of the Government, than was previously the case, to understand the difficulties facing producers of particular metal minerals in carrying out full processing and refining of their products any time soon.

In this article, the writer will detail the changes made by MoEMRR 8/2015 before trying to assess the longer term implications of MoEMRR 8/2015 for Indonesia's commitment to domestic processing and refining of metal minerals.

BACKGROUND

In January 2014 and just before the full implementation of the export ban on unprocessed metal minerals ("**Export Ban**"), the Government came up with a "grand compromise, which distinguished between (i) those metal minerals which it was not realistic to expect, in the near term, any greater level of domestic processing and refining than was already taking place ("**Category 1 Minerals**") and (ii) those metal minerals which it was realistic (at least in the mind of the Government) to expect, in the near term, a greater level of domestic processing and refining than was already taking place ("**Category 2 Minerals**") ("**Grand Compromise**").

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[2] Bill Sullivan is the author of "*Mining Law & Regulatory Practice in Indonesia – A Primary Reference Source*" (Wiley, New York & Singapore 2013), the first internationally published, comprehensive book on Indonesia's 2009 Mining Law and its implementing regulations.
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[5] This article appeared in the May - June 2015 issue of Coal Asia Magazine.

As part of the Grand Compromise, Category 1 Minerals are allowed to be exported, until at least 12 January 2017, in "concentrate form"; that is, so long as a specified minimum level of processing and refining has been carried out and which minimum level of processing and refining is substantially less than that originally mandated by the Government in 2012 as part of MoEMR Regulation No. 7 of 2012 re Local Processing & Refining of Minerals ("**MoEMRR 7/2012**").

Category 2 Minerals are, however, still only allowed to be exported, after 12 January 2014, if the full minimum level of processing and refining, as originally mandated by the Government in MoEMRR 7/2012, is carried out.

Substantially, the Government compromised on the level of processing and refining required for Category 1 Minerals but offered no compromise in the case of Category 2 Minerals.

The Category 1 Minerals originally recognized by the Government were Copper, Iron Ore, Manganese, Lead, Zinc, Ilmenite and Titanium.

The Category 2 Minerals originally recognized by the Government were primarily nickel, bauxite, tin, gold, silver and chromium as well as, most probably, all the remaining 65 mineral products originally specified by the Government in MoEMRR 7/2012 as being subject to the Export Ban and which are not otherwise Category 1 Minerals.

Readers interested in knowing more about the Export Ban and the Grand Compromise are referred to the writer's earlier article "*The Export Ban as Finally Introduced – A Grand Compromise with Much Residual Uncertainty*", Petromindo, Coal Asia Magazine, January – February 2014.

COMMENTARY

1. <u>The Changes to Minimum Processing & Refining Specifications made by MoEMRR 8/2015</u>

The changes made by MoEMRR 8/2015 to the minimum domestic processing and refining specifications for certain metal minerals are many in number and highly technical in nature. Accordingly, the writer has determined that the most comprehensible way to present the MoEMRR 8/2015 changes, to readers, is in the following table, with the minimum processing requirements for different metal minerals and the minimum refining requirements for different metal minerals each being presented in 2 columns separately showing (i) the minimum processing/refining requirements in 2014 prior to the issuance of MoEMR 8/2015 and (ii) the minimum processing/refining requirements in 2015 following the issuance of MoEMR 8/2015.

MINIMUM SPECIFICATIONS FOR DOMESTIC PROCESSING AND REFINING OF METAL MINERALS BEFORE AND AFTER MOEMRR 8/2015

No	Commodities		Minimum Specification					
			Processing			Refining		
	Ore	Minerals	Products	Quality 2014[6]	Quality 2015[7]	Products	Quality 2014[8]	Quality 2015[9]
1.	Copper (fusion process)	Chalcopyrite Digenite Bornite Cuprite Covellite	Copper Concentrate	≥ 15% Cu		a. Copper cathode	Metal Cu ≥ 99%	
						b. Anode mud	a. Metal Au ≥ 99%;	
							b. Metal Ag ≥ 99%;	
							c. Bullion Pb ≥ 90%;	
							d. Metal Pd ≥ 99%;	
							e. Metal Pt ≥ 99%;	
							f. Metal Se ≥ 99%;	
							g. Metal Te ≥ 99%	
							h. -	g. Metal TeO_2 ≥ 99%;
							i. -	h. $Te(OH)_4$ ≥ 98%;
							j. PbO ≥ 98%;	
							k. PbO_2 ≥ 98%;	
							l. SeO_2 ≥ 98%; and/or	
							m. Rare earth metal (refer to the requirements for rare earth metal in tin)	
						c. Copper telluride	a. Metal Cu ≥ 99%;	
							b. Metal Te ≥ 99%;	
							c. TeO_2 ≥ 98%;	
							d. $Te(OH)_4$ ≥ 98%;	
							e. -	e. Metal alloy of copper telluride ≥ 20% Te

[6] As per Appendix I of MoEMRR 1/2014.
[7] As per Appendix I of MoEMRR 8/2015.
[8] As per Appendix I of MoEMRR 1/2014.
[9] As per Appendix I of MoEMRR 8/2015.

No	Commodities		Minimum Specification					
			Processing			Refining		
	Ore	Minerals	Products	Quality 2014[6]	Quality 2015[7]	Products	Quality 2014[8]	Quality 2015[9]
	Copper (leaching process)	Chalcopyrite Digenite Bornite Cuprite Covellite	-	-	-	Metal	a. Metal Cu ≥ 99%;	
							b. Metal Au ≥ 99%;	
							c. Metal Ag ≥ 99%;	
							d. Metal Pd ≥ 99%;	
							e. Metal Pt ≥ 99%;	
							f. Metal Se ≥ 99%;	
							g. Metal Te ≥ 99%;	
							h. -	h. TeO2 ≥ 98%;
							i. -	i. Te $(OH)_4$ ≥ 98%; and/or
							j. Rare earth metal (refer to the requirements for rare earth metal in tin)	
2.	Nickel and/or cobalt (fusion process) a. Saprolite; b. Limonite.	a. Pentlandite b. Garnierite c. Serpentinite d. Carolite	-	-	-	Nickel matte, metal alloy and nickel metal	a. Ni matte ≥ 70% Ni;	
							b. FeNi ≥ 10%Ni;	
							c. Nickel Pig Iron (NPI) ≥ 4% Ni;	
							d. Metal Ni ≥ 93%;	
							e. Metal Fe ≥ 93% and/or	e. -
							f. NiO ≥ 70% Ni	
	Nickel and/or cobalt (leaching process) limonite					Metal, metal oxide, metal sulfide, mix hydroxide/sulfide precipitate, and hydroxide nickel carbonate	a. Metal Ni ≥ 93%;	
							b. Mix hydroxide precipitate (MHP) ≥ 25% Ni;	
							c. Mix sulfide precipitate (MSP) ≥ 45% Ni;	
							d. Hydroxide Nickel Carbonate (HNC) ≥ 40% Ni;	
							e. NiS ≥ 40% Ni;	
							f. Metal Co ≥ 93%;	

No	Commodities		Minimum Specification					
			Processing			Refining		
	Ore	Minerals	Products	Quality 2014[6]	Quality 2015[7]	Products	Quality 2014[8]	Quality 2015[9]
							g. $CoS \geq 40\%$ Co;	
							h. Metal $Cr \geq 99\%$;	
							i. $Cr2O3 \geq 40\%$; and/or	
							j. MnO_2 containing Mn_2 15%	j. -
	Nickel and/or cobalt (reduction process) a. Saprolite; b. Limonite.					Metal alloy	a. FeNi spon (Sponge FeNi) ≥ 4% Ni;	
							b. Luppen FeNi ≥ 4% Ni; and/or	
							c. Nugget FeNi ≥ 4% Ni	
3.	Bauxite	Gibbsite Diaspore Boehmite	-		-	Metal oxide/hydroxide and metal	a. Smelter grade alumina ≥ 98% AL_2O_3;	
							b. Chemical grade alumina ≥ 90% AL_2O_3 ≥ 90% $Al(OH)_3$; and/or	b. Chemical Grade Alumina ≥ 90% AL_2O_3;
							c. -	c. Alumina Hydrate ≥ 90% $Al(OH)_3$;

No	Commodities		Minimum Specification					
			Processing			Refining		
	Ore	Minerals	Products	Quality 2014[6]	Quality 2015[7]	Products	Quality 2014[8]	Quality 2015[9]
							d. -	d. Proppant: 1) $AL_2O_3 \geq$ 70% (Granulated); 2) Capable of rupturing at pressure level of 7,500 psi, fraction size - 20+40 mesh ≤ 5.2% - 30+50 mesh ≤ 2.5%; or -40+70 mesh ≤ 2.0%. 3) Apparent Specific Gravity (ASG) 3.15; and/or
							e. Metal Al ≥ 99%	
4.	Iron	Hematite Magnetite	Iron concentrate *)	≥ 62% Fe	≥ 62% Fe and ≤ 1 % TiO_2	Sponge, metal and metal alloy	a. Sponge iron ≥ 75% Fe;	
							b. Pig iron ≥ 90% Fe; and/or	
							c. Ferro alloy ≥ 83%Fe	
		Goethite/ laterite	Iron laterite concentrate **)	≥ 51% Fe Content (AL_2O_3 + SiO_2) ≥ 10%				
		Lamela magnetite-	Iron sand concentrate	≥ 58% Fe	≥ 58% Fe and	Metal	a. Sponge iron ≥ 75% Fe; and/or	

No	Commodities		Minimum Specification					
			Processing			Refining		
	Ore	Minerals	Products	Quality 2014[6]	Quality 2015[7]	Products	Quality 2014[8]	Quality 2015[9]
		ilmenite (iron sand)	***)		1% < TiO_2 ≤ 25%		b. Pig iron ≥ 90% Fe	
			Iron sand pellets concentrate ****)	≥ 56% Fe	≥ 56% Fe and 1% < TiO_2 ≤ 25%	Slag	a. TiO_2 ≥ 85%;	
							b. $TICl_4$ ≥ 98%;	
							c. Titanium metal alloys ≥ 65%;	
							d. V_2O_5 ≥ 90%;	
							e. Vanadium metal alloy ≥ 65% V; and/or	
							f. Rare metal and rare earth (refer to the requirements for rare earth metal in tin)	
			Ilmenite concentrate *****)	-	≥ 50% TiO_2	Metal oxide, metal chloride and metal alloy	-	a. Syntheti c TiO_2 ≥ 85%;
								b. $TiCl_4$ ≥ 87%; and/or
								c. Metal alloy ≥ 65% Ti
						Slag	-	Refer to the requirement for slag in iron sand concentrate
5.	Tin	Cassiterite	Byproducts of Zircon, Ilmenite and Rutile concentrate	Refer to the require ment for Zircon, Ilmenite , rutile in Zircon, non-metal minerals .	-	Metal	Metal Sn ≥ 99.90%	
						Slag	a. Metal W ≥ 90%;	
							b. Ta_2O_5 ≥ 90%;	
							c. Nb_2O_5 ≥ 90%; and/or	
							d. Sb_2O_5 ≥ 90%	d. Sb_2O_3 ≥ 90%

No	Commodities		Minimum Specification					
			Processing			Refining		
	Ore	Minerals	Products	Quality 2014[6]	Quality 2015[7]	Products	Quality 2014[8]	Quality 2015[9]
			Zircon concentrate	-	Refer to the requirement for Zirconium and Zircon		-	Refer to the requirements for zirconium and zircon
			Ilmenite concentrate	-	Refer to the requirement for Ilmenite in Iron Sand		-	Refer to the requirements for ilmenite in iron sand
			Rutile concentrate	-	$TiO_2 \geq 90\%$	Metal chloride and metal alloy	-	a. TiCl4 ≥ 98%; and/or b. Titanium metal alloy ≥ 65% Ti
			Monazite and xenotime concentrate	a. Rare earth metal oxide (REO) ≥ 99%;	-	Metal oxide, metal hydroxide, and rare earth metal	-	a. Rare earth metal oxide (REO) ≥ 99%;
				b. Rare earth hydroxide metal (REOH) ≥ 99%; and/or				b. Rare earth hydroxide metal (REOH) ≥ 99%; and/or
				c. Rare earth metal ≥ 99%				c. Rare earth metal ≥ 99%

No	Commodities		Minimum Specification					
			Processing			Refining		
	Ore	Minerals	Products	Quality 2014[6]	Quality 2015[7]	Products	Quality 2014[8]	Quality 2015[9]
6.	Manganese	Pyrolusite Psilomelane Braunite Manganite	Manganese concentrate	≥ 49% Mn		Metal, metal alloy and manganese chemical	a. Ferro Manganese (FeMn), Mn ≥ 60%;	
							b. Silica Manganese (SiMn), Mn ≥ 60%;	
							c. Monoxide manganese (MnO) Mn ≥ 47.5%, MnO_2 ≤ 4%;	
							d. Sulfate manganese ($MnSo_4$) ≥ 90%;	
							e. Chloride manganese ($MnCl_2$) ≥ 90%;	
							f. Synthetic carbonate manganese ($MnCO_3$) ≥ 90%;	
							g. Potassium permanganate ($KMnO_4$) ≥ 90%;	
							h. Manganese oxide (Mn_3O_4) ≥ 90%;	
							i. Synthetic dioxide manganese (MnO_2) ≥ 98%; and/or	
							j. Direct reduced manganese Mn ≥ 49%, MnO_2 ≤ 4%	
7.	Lead and Zinc	Galena Sphalerite Smithsonite Hemimorphite (calamide)	Zinc concentrate	≥ 52% Zn	≥ 52% Zn	Metal, metal oxide / hydroxide	a. Bullion ≥ 90% Pb;	a. -
							b. PbO ≥ 98%;	b. -
							c. $Pb(OH)_2$ ≥ 98%;	c. -
							d. PbO_2 ≥ 98%;	d. -
							e. Bullion ≥ 90% Zn;	
							f. ZnO ≥ 98%;	
							g. ZnO_2 ≥ 98%; and/or	
							h. $Zn(OH)_2$ ≥ 98%	
						Gold and/or silver Metal	a. Metal Au ≥ 99%; and/or	
							b. Metal Ag ≥ 99%;	
			Lead	≥ 57% Pb		Metal, metal	a. Bullion ≥ 90% Pb;	

No	Commodities		Minimum Specification					
			Processing			Refining		
	Ore	Minerals	Products	Quality 2014[6]	Quality 2015[7]	Products	Quality 2014[8]	Quality 2015[9]
			concentrate			oxide / hydroxide	b. $PbO \geq$ 98%;	
							c. $Pb(OH)_2 \geq$ 98%;	
							d. $PbO_2 \geq$ 98%;	
							e. Bullion ≥ 90% Zn;	e. -
							f. $ZnO \geq$ 98%	f. -
							g. $ZnO_2 \geq$ 98%	g. -
							h. $Zn(OH)_2 \geq$ 98%	h. -
8.	Gold	a. Native b. Associated minerals	-	-	-	Gold Metal	Metal Au ≥ 99%	
9.	Silver	a. Native b. Associated minerals	-	-	-	Silver Metal	Metal Ag ≥ 99%	
10.	Chromium	Chromites	-	-	-	Metal and metal alloy	a. Metal Cr ≥ 99%; and/or	
							b. Chromium Metal alloy ≥ 60% Cr	
11.	Zirconium		-	-	-	Zircon chemicals, zircon sponge, zirconia, zircon metal and hafnium	-	a. Zirconium Oxychloride (ZOC), $ZrOCl_2.8H_2O \geq$ 90%;
								b. Zirconium Sulfide (ZOS), $Zr(SO_4)_2.4H_2O \geq$ 90%;
								c. Zirconium Sulfide based (ZBS), $Zr_5O_8(SO_4)_2.xH_2O \geq$ 90%;

No	Commodities		Minimum Specification					
			Processing			Refining		
	Ore	Minerals	Products	Quality 2014[6]	Quality 2015[7]	Products	Quality 2014[8]	Quality 2015[9]
								d. Zirconium Carbonate based (ZBC), $ZrOCO_3 xH_2O \geq 90\%$;
								e. Ammonium Zirconium Carbonate (AZC), $(NH_4)_3ZrOH(CO_3)_3.2H_2O \geq 90\%$;
								f. Zirconium Acetate (ZAC), $H_2ZrO_2(C_2H_3O_2)_2 \geq 90\%$;
								g. Potassium Hexafluoro Zirconate (KFZ), $K_2ZrF_6 \geq 90\%$;
								h. Zirconium Sponge $\geq$ 85% Zr;
								i. Zirconnia $(ZrO_2 + HfO_2) \geq 99\%$; and/or

No	Commodities		Minimum Specification					
			Processing			Refining		
	Ore	Minerals	Products	Quality 2014[6]	Quality 2015[7]	Products	Quality 2014[8]	Quality 2015[9]
								j. Zirconium ≥ 95% Zr; and/or k. Hafnium ≥ 95% Hf
			Ilmenite	-	Refer to the requirement of ilmenite in iron sands		-	Refer to the requirement for ilmenite in iron sand
			Rutile	-	Refer to the requirement of rutile concentrate in tin		-	Refer to the requirement for rutile concentrate in tin
12.	Antimony	Stibnite	-	-	-	Antimony metal	-	a. Sb ≥ 99% ; and/or b. Sb_2O_5 ≥ 95%

Notes:

*) Iron concentrate is iron concentrate which contains hematite/magnetite minerals with a total iron element of Fe ≥ 62%.

**) Laterite iron concentrate is iron concentrate which contains goethite/laterite minerals with a total iron element of Fe ≥ 51% and a content of alumina (Al_20_3) and silica (SiO_2) ≥ 10%.

***) Iron sand concentrate is iron concentrate which contains lamella magnetite-ilmenite minerals with a total iron element of Fe ≥ 58% and the element of titanium oxide 1% ≤ TiO_2 ≤ 25%.

****) Iron sand pellets concentrate is iron concentrate in the form of pellets which contain lamella magnetite-ilmenite minerals with a total iron element of Fe ≥ 56% and the element of titanium oxide 1% ≤ TiO_2 ≤ 25%.

*****) Ilmenite concentrate is iron concentrate which contains lamella magnetite-ilmenite minerals

with an element of titanium oxide $TiO_2 \geq$ 50%.

2. Treatment of Bauxite

MoEMRR 8/2015's treatment of Bauxite is particularly significant as the minimum domestic processing and refining requirement for Bauxite can, for the first time, now be satisfied by the domestic processing and refining of Bauxite ore into a Bauxite-based intermediate product called a "Proppant". "Proppants" are used in hydraulic fracturing of shale to (i) keep open the fissures or cracks in the shale created by injecting vast quantities of water, sand and chemicals at high pressure down and across into horizontally drilled wells and (ii) allow the natural gas, from the shale, to flow through the fissures or cracks and up the well.

MoEMRR 8/2015 will allow Bauxite producers to continue to export at least some of their production in semi-refined form, as Bauxite-based Proppants, and without having to carry out full domestic processing and refining of their Bauxite ore to the level of at least 90% pure chemical grade Alumina. Proppants may be seen as being, in some respects, the Bauxite producer's equivalent of the intermediate product, Copper Concentrate, which Copper producers are allowed to export pending the introduction of full domestic processing and refining for Copper producers in January 2017.

MoEMRR 8/2015 has essentially moved Bauxite from being a Category 2 Mineral, with an immediate requirement for full domestic processing and refining, to being a Category 1 Mineral which, for the time being at least, may be exported in less than fully processed and refined form.

Notwithstanding MoEMRR 8/2015's relaxation of the domestic processing and refining requirement for Bauxite, it is important to understand that Bauxite-based Proppants are still a refined product which must include Alumina refined to the level of 70% purity. The production of so-called "Ceramic Proppants", which include Bauxite-based Proppants, also involves a multi-step manufacturing process. As such, it remains to be seen how financially and technically feasible it is for Indonesia's Bauxite producers to engage in large scale manufacturing of Bauxite-based Proppants. It also remains to be seen whether or not the market opportunities for Bauxite-based Proppants are sufficiently attractive to interest third party service providers in constructing and operating Bauxite-based Proppant manufacturing facilities intended to process the ore production of multiple Bauxite producers.

3. **Policy Implications**

It is interesting to speculate how, if at all, MoEMRR 8/2015's special treatment of Bauxite relates to the proposal, floated in March, by Said Didu (the head of the Government's own advisory team on smelter development) that, at least for the next few years, of the Export Ban on unprocessed Bauxite be removed as a way to help Bauxite producers raise fresh funds in order to eventually finance the construction of Bauxite smelters, many of which smelter projects have stalled, according to Said Didu, because of "financial problems" (see 24 March 2015 edition of *The Jakarta Post*). At the time, Said Didu was widely seen as being the leading candidate to replace Dr. Sukhyar as Director General of Minerals & Coal ("**DGoMC**"), a position that ended up going to Bambang Gatot Ariyono, supposedly as a result of last minute intervention by the President. The potential implications of Said Didu's proposal are discussed, at length, in the writer's earlier article "*Mining Policy Reform – Is GoI Willing to Pay the Price for More Revenue from the Mining Industry?"* Petromindo, Coal Asia Magazine, April – May 2015.

Given the very negative and public reaction, at the time, of Dr. Sukyhar to Said Didu's proposal and the fact that Said Didu did not end up becoming DGoMC, it is reasonable to conclude that the Government does not intend to remove the Export Ban on unprocessed Bauxite. Nevertheless, MoEMRR 8/2015's introduction of Proppants, as an intermediate product that Bauxite producers can export without having to carry out full domestic processing and refining, may be seen as a compromise between full implementation of the Export Ban on unprocessed Bauxite, as clearly favored by Dr. Sukhyar, and temporary relaxation of the Export Ban on unprocessed Bauxite as proposed by Said Didu. As such, it appears the Government has been willing to take into account the difficult financial position of many Bauxite producers and endeavor to find a way to enable Bauxite producers to continue generating cash flow without having to build chemical and smelter grade Alumina plants.

Presumably, the Government believes that allowing Bauxite producers to export an intermediate product, in the form of Proppants, will not act as a material disincentive to promoters of Alumina smelters. These promoters may, however, have reason to be concerned that Proppants could be just "the thin end of the wedge" and that other modifications to the Export Ban, in respect of unprocessed Bauxite, will be considered by the Government if MoEMRR 8/2015 does not provide sufficient relief to enable struggling Bauxite producers to continue operating without having to build chemical and smelter grade Alumina plants. It is these sorts of nuanced policy changes, as to how the Export Ban is to be applied and enforced in the case of individual metal minerals, that are increasingly likely as the Government evaluates how compatible or otherwise is full and immediate implementation of domestic processing and refining of metal minerals with the Government's number one priority of "fast tracking" infrastructure development to achieve 7% annual GDP growth and, thereby, address the endemic Indonesian problem of unemployment and underemployment. In the final analysis, the Government's heavily populist underpinnings mean it will surely be judged by its supporters more on the basis of its progress or otherwise in reducing unemployment and underemployment than it will be on the basis of its progress or otherwise in achieving full domestic processing and refining of all metal minerals. It could be a big mistake for promoters of domestic smelters to not give sufficient weight to the all important imperative, for the current populist Government, to meet the minimum expectations of its support base, which expectations are likely to be comparatively short term and relatively unsophisticated in nature.

SUMMARY AND CONCLUSIONS

The Government has continued to "fine tune" the specifications for domestic processing and refining of metal minerals in a good faith effort to address various practical problems to which the original 2012 specifications have given rise. MoEMRR 8/2015 is just the latest example of this "fine tuning" and should be welcomed as a sign of flexibility on the part of the Government in implementing the hugely controversial domestic processing and refining policy.

Bauxite producers are the main intended beneficiaries of MoEMRR 8/2015.

It remains to be seen, however, whether the recognition of Proppants, as an intermediate exportable product, provides much actual relief for Bauxite producers.

Promoters of domestic smelters will or, at least, should be watching carefully how the Government handles the predicament of Bauxite producers for guidance on the likely future direction of Government policy with regard to the full implementation of domestic processing and refining of other Category 2 Minerals.

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