Public Consultation on Critical Raw Materials Act

Fields marked with * are mandatory.

Introduction

Critical raw materials are key to the green and digital transitions as well as to other EU priorities such as EU resilience and security. They are essential components of green technologies, are used in digital applications, and are crucial to the defence, aerospace and health industries. To secure a sustainable supply, the European Commission has had in place a dedicated strategy since 2008 and put forward an action plan in the 2020 Communication on Critical Raw Materials. Although the action plan is on track, the current context of growing global demand and increasing geopolitical instability creates the need for increased efforts.

In light of the need to reduce dependence on Russian fossil fuels and to speed up progress towards achieving climate neutrality by 2050 as set out by the European Green Deal, the REPowerEU communication announced the urgent acceleration of the energy transition. The European Council’s Versailles Declaration of March 2022 called to secure EU supply of critical raw materials, particularly by building on the strengths of the Single Market. Similarly, the European Parliament called for an EU strategy for critical raw materials in its November 2021 resolution. The REPowerEU communication and the Joint Communication on the Defence Investment Gaps Analysis and Way Forward announced in May 2022 that actions, including by legislative means, will strengthen EU resilience and security of supply of critical raw materials.

Against this background, the President of the European Commission, Ursula von der Leyen, in her State of the Union speech, announced a European Critical Raw Materials Act, notably to identify strategic projects all along the value chain and to build up strategic reserves where supply is at risk. In parallel, the President announced the pursuit of supply diversification through Free Trade Agreements and new partnerships to advance the EU’s vital interests and values. This includes ensuring undistorted trade and investment as well as developing industrial and cooperation actions with like-minded partners and resource rich countries.

This initiative will hence take the form of a package consisting of regulatory and non-regulatory actions.

The objective of the Act could be to reinforce the EU’s monitoring capacity and help secure a sustainable supply of diverse critical raw materials. For that purpose, the initiative should seek to strengthen the European value chain through the identification of mineral resources and of critical raw materials projects in the European strategic interest, while ensuring a high level of environmental protection, including projects that promote a circular economy and resource efficiency through the uptake of secondary raw materials.
Further background can be found in the Call for Evidence.

This public consultation aims at offering the general public and relevant stakeholders the opportunity to provide input for a legislative proposal aimed at securing the EU’s supply of critical raw materials. The responses, together with evidence gathered from different sources including desk research and other targeted consultations, will provide an analytical basis for the planned legislative proposal.

Scope:

- “Critical raw materials”, when mentioned in the consultation, refers not only to the list of critical raw materials published in 2020, but can also include other strategic raw materials (e.g. copper). However, please note that energy raw materials (e.g. coal) and agricultural raw materials (e.g. wheat) do not fall under the scope of this consultation;
- “Critical raw materials projects”, when mentioned in the consultation, refer to projects all along the critical raw materials value chain: they can include exploration, extraction, refining, processing or recycling activities.

The questionnaire is divided into the following parts:

1) About you
2) Challenges for securing sustainable supply of critical raw materials
3) Possible measures to ensure a secure and sustainable supply of critical raw materials

The deadline for replies is 25 November 2022.

You can send any additional information that you consider relevant to this consultation to the mailbox GROW-I1@ec.europa.eu, indicating ‘public consultation critical raw materials’ in the subject of your email.

Thank you for your cooperation.

About you

* Language of my contribution
  - Bulgarian
  - Croatian
  - Czech
  - Danish
  - Dutch
  - English
  - Estonian
  - Finnish
  - French
  - German
● Greek
● Hungarian
● Irish
● Italian
● Latvian
● Lithuanian
● Maltese
● Polish
● Portuguese
● Romanian
● Slovak
● Slovenian
● Spanish
● Swedish

* I am giving my contribution as
  ○ Academic/research institution
  ○ Business association
  ○ Company/business organisation
  ○ Consumer organisation
  ○ EU citizen
  ○ Environmental organisation
  ○ Non-EU citizen
  ○ Non-governmental organisation (NGO)
  ○ Public authority
  ○ Trade union
  ○ Other

* First name
  Oliver

* Surname
  LOEBEL

* Email (this won’t be published)
* Organisation name

255 character(s) maximum

EurEau

* Organisation size

- Micro (1 to 9 employees)
- Small (10 to 49 employees)
- Medium (50 to 249 employees)
- Large (250 or more)

Transparency register number

255 character(s) maximum

Check if your organisation is on the transparency register. It's a voluntary database for organisations seeking to influence EU decision-making.

39299129772-62

* Country of origin

Please add your country of origin, or that of your organisation.

This list does not represent the official position of the European institutions with regard to the legal status or policy of the entities mentioned. It is a harmonisation of often divergent lists and practices.

- Afghanistan
- Åland Islands
- Albania
- Algeria
- American Samoa
- Andorra
- Angola
- Anguilla
- Antarctica
- Djibouti
- Dominica
- Dominican Republic
- Ecuador
- Egypt
- El Salvador
- Equatorial Guinea
- Eritrea
- Estonia
- Libya
- Liechtenstein
- Lithuania
- Luxembourg
- Macau
- Madagascar
- Malawi
- Malaysia
- Maldives
- Saint Martin
- Saint Pierre and Miquelon
- Saint Vincent and the Grenadines
- Samoa
- San Marino
- São Tomé and Príncipe
- Saudi Arabia
- Senegal
- Serbia
Brunei  
Bulgaria  
Burkina Faso  
Burundi  
Cambodia  
Cameroon  
Canada  
Cape Verde  
Cayman Islands  
Central African Republic  
Chad  
Chile  
China  
Christmas Island  
Clipperton  
Cocos (Keeling) Islands  
Colombia  
Comoros  
Congo  
Cook Islands  
Costa Rica  
Côte d’Ivoire  
Croatia  
Cuba  
Curaçao  
Cyprus  
Haiti  
Heard Island and McDonald Islands  
Honduras  
Hong Kong  
Hungary  
Iceland  
India  
Indonesia  
Iran  
Iraq  
Ireland  
Isle of Man  
Israel  
Italy  
Jamaica  
Japan  
Jersey  
Jordan  
Kazakhstan  
Kenya  
Kiribati  
Kosovo  
Kuwait  
Kyrgyzstan  
Laos  
Latvia  
Liberia  
Lithuania  
Luxembourg  
Madagascar  
Malawi  
Malaysia  
Maldives  
Mali  
Malta  
Mauritania  
Mauritius  
Mayotte  
Mexico  
Micronesia  
Moldova  
Monaco  
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Morocco  
Mozambique  
Myanmar  
Nauru  
Nepal  
Netherlands  
New Caledonia  
New Zealand  
Nicaragua  
Niger  
Nigeria  
Niue  
Northern Marianas Islands  
Northern Mariana Islands  
North Korea  
Norfolk Island  
Norway  
Oman  
Pakistan  
Palau  
Palestine  
Panama  
Papua New Guinea  
Paraguay  
Peru  
Philippines  
Pitcairn Islands  
Poland  
Portugal  
Puerto Rico  
Qatar  
Réunion  
Romania  
Russia  
Rwanda  
Saint Barthélemy  
Saint Kitts and Nevis  
Saint Lucia  
Saint Vincent and the Grenadines  
Samoa  
San Marino  
Sao Tome and Principe  
Saudi Arabia  
Senegal  
Serbia  
Seychelles  
Sierra Leone  
Singapore  
Slovakia  
Slovenia  
Solomon Islands  
Somalia  
South Africa  
South Georgia and the South Sandwich Islands  
South Korea  
South Sudan  
Spain  
Sri Lanka  
Sudan  
Suriname  
Svalbard and Jan Mayen  
Sweden  
Switzerland  
Syria  
Taiwan  
Tajikistan  
Thailand  
Togo  
Tokelau  
Tonga  
Trinidad and Tobago  
Tunisia  
Turkey  
Turkmenistan  
Turks and Caicos Islands  
Tuvalu  
Uganda  
Ukraine  
United Arab Emirates  
United Kingdom  
United States  
United States Minor Outlying Islands  
Uruguay  
US Virgin Islands  
Uzbekistan  
Vanuatu  
Vatican City  
Venezuela  
Vietnam  
Wallis and Futuna  
Western Sahara  
Yemen
The Commission will publish all contributions to this public consultation. You can choose whether you would prefer to have your details published or to remain anonymous when your contribution is published. For the purpose of transparency, the type of respondent (for example, ‘business association’, ‘consumer association’, ‘EU citizen’) country of origin, organisation name and size, and its transparency register number, are always published. Your e-mail address will never be published. Opt in to select the privacy option that best suits you. Privacy options default based on the type of respondent selected.

**Contribution publication privacy settings**

The Commission will publish the responses to this public consultation. You can choose whether you would like your details to be made public or to remain anonymous.

- **Anonymous**
  Only organisation details are published: The type of respondent that you responded to this consultation as, the name of the organisation on whose behalf you reply as well as its transparency number, its size, its country of origin and your contribution will be published as received. Your name will not be published. Please do not include any personal data in the contribution itself if you want to remain anonymous.

- **Public**
  Organisation details and respondent details are published: The type of respondent that you responded to this consultation as, the name of the organisation on whose behalf you reply as well as its transparency number, its size, its country of origin and your contribution will be published. Your name will also be published.

- I agree with the [personal data protection provisions](#)

Which of the following activities are performed by your company or the companies represented by your association (either in the past, presently, or potentially in the future)? (more than one choice is possible)

- Exploration of critical raw materials (e.g. junior miners).
- Extraction of critical raw materials.
- Processing or refining of critical raw materials from primary sources.
- Trading of critical raw materials.
- Use of critical raw materials in manufacturing.
- Research and innovation on critical raw material (e.g. substitution).
- Processing or refining of critical raw materials from secondary sources.
- My company / association is not involved in any of the activities listed above.

Please indicate from which waste stream(s) your company recycles or recovers critical raw materials (e.g. Batteries, End-of-Life Vehicles (ELV), waste electrical and electronic equipment (WEEE), Mining, others).

Urban waste water

2) Challenges for securing sustainable supply of critical raw materials

General Challenges

To what extent do you agree with the following statements?

<table>
<thead>
<tr>
<th></th>
<th>Strongly agree</th>
<th>Agree</th>
<th>Neutral</th>
<th>Disagree</th>
<th>Strongly disagree</th>
<th>I don't know / no opinion</th>
</tr>
</thead>
<tbody>
<tr>
<td>a. The potential to extract critical raw materials from primary sources in the EU is currently underexploited.</td>
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<tr>
<td>b. The EU’s processing and refining capacities for critical raw materials are currently insufficient.</td>
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<tr>
<td>c. The potential to re-use or recycle critical raw materials from waste is currently underexploited in the EU.</td>
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<tr>
<td>d. The potential to diversify the EU’s external supply of critical raw materials is currently underexploited.</td>
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### Current EU Policies

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<thead>
<tr>
<th>e. The potential to substitute critical raw materials is currently underexploited in the EU.</th>
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<tbody>
<tr>
<td>f. The potential to increase efficiency of critical raw materials use is currently underexploited in the EU.</td>
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<tr>
<td>g. Industry is not able to tackle critical raw materials sourcing challenges on the global market without further EU policy intervention.</td>
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<tr>
<td>h. Current EU policies on critical raw materials are insufficient to effectively manage supply chain disruptions, shortages and price hikes.</td>
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</tbody>
</table>

b. You agree or strongly agree that the EU’s processing and refining capacities for critical raw materials are currently insufficient. Please specify for which critical raw material(s) this is the case.

- Phosphorous

c. You agree or strongly agree that the potential to re-use or recycle critical raw materials from waste is currently underexploited in the EU. Please specify for which waste stream(s) this is the case.

- Phosphorous

e. You agree or strongly agree that the potential to substitute critical raw materials is currently underexploited in the EU. Please specify for which critical raw material(s) this is the case.

- Phosphorous rock

f. You agree or strongly agree that the potential to increase the efficiency of critical material use is currently underexploited in the EU. Please specify for which critical raw material(s) this is the case.

- Replace mineral fertilisers by fertilisers from organic sources and reduce overall fertiliser use to protect groundwater and surface water resources.
To what extent do you agree that the **existing EU policy actions** contribute to secure the EU’s supply of critical raw materials?

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<thead>
<tr>
<th></th>
<th>Strongly agree</th>
<th>Agree</th>
<th>Neutral</th>
<th>Disagree</th>
<th>Strongly disagree</th>
<th>I don't know / no opinion</th>
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<tbody>
<tr>
<td>a. Establishing and updating the critical raw materials list.</td>
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<td>b. Developing the European Raw Materials Alliance.</td>
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<td>c. Concluding Strategic partnerships with resource rich third countries.</td>
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<td>d. Developing a transparent and stable trade framework for facilitating trade in raw materials, including through free trade agreements with resource rich third countries.</td>
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<td>e. Funding research and innovation on resource efficiency, recycling and substitution of critical raw materials through Horizon Europe.</td>
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<tr>
<td>f. Developing and coordinating knowledge through research projects, such as the raw materials information system (<a href="https://rmis.jrc.ec.europa.eu/">https://rmis.jrc.ec.europa.eu/</a>).</td>
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</table>
Supply chain vulnerability
What share of your supply of critical raw materials intended for use in the EU is extracted outside the EU?

<table>
<thead>
<tr>
<th></th>
<th>Less than 25%</th>
<th>Between 25 and 50%</th>
<th>Between 50 and 75%</th>
<th>More than 75%</th>
<th>Information not available</th>
</tr>
</thead>
<tbody>
<tr>
<td>Please fill in relevant raw materials in the right category (e.g. write in ‘lithium’ under ‘more than 75%’).</td>
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</table>
In how many different third countries is your supply of critical raw materials extracted?

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<thead>
<tr>
<th>One country</th>
<th>Two countries</th>
<th>Three countries</th>
<th>More than three countries</th>
<th>Information not available</th>
</tr>
</thead>
<tbody>
<tr>
<td>Please fill in relevant raw materials in the applicable category (e.g. write in 'lithium' under 'two countries'). Optional: please add the relevant countries (e.g. write in 'lithium from Chile and China' under 'two countries').</td>
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<td>X</td>
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</table>
What share of your supply of critical raw materials into the EU is processed and/or refined outside the EU?

<table>
<thead>
<tr>
<th></th>
<th>Less than 25%</th>
<th>Between 25 and 50%</th>
<th>Between 50 and 75%</th>
<th>More than 75%</th>
<th>Information not available</th>
</tr>
</thead>
<tbody>
<tr>
<td>Please fill in relevant raw materials in the right category (e.g. write in 'lithium' under 'more than 75%').</td>
<td></td>
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<td>X</td>
</tr>
</tbody>
</table>
In how many different third countries is your supply of critical raw materials processed and/or refined?

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<thead>
<tr>
<th></th>
<th>One country</th>
<th>Two countries</th>
<th>Three countries</th>
<th>More than three countries</th>
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<td>Please fill in relevant raw materials in the applicable category (e.g. write in 'lithium' under 'two countries').</td>
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<tr>
<td>Optional: please add the relevant countries (e.g. write in 'lithium from Chile and China' under 'two countries').</td>
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</tbody>
</table>
Have you experienced in the last five years any of the problems below in relation to your supply of critical raw materials?

- [x] Supply shortages
- [x] Supply disruptions
- [x] Strong volatility in prices
- [ ] Other supply problems
- [ ] We have not experienced any supply problems.

Please specify how this problem affected you, your company or institution, and which critical raw materials were concerned

Coagulants are widely used in drinking water and waste water treatment. As to the latter, they are used to recover phosphorous from the waste water. If they are not available in sufficient quantities compliance with quality standards may be jeopardised.

Are these problems more or less acute compared to the difficulties of sourcing other inputs that are not related to critical raw materials?

They are acute.

Do you feel that your supply of critical raw materials is more at risk of being affected by supply shortages, supply disruptions or strong volatility in prices than your supply of other inputs?

- [ ] Strongly agree
- [ ] Agree
- [x] Neutral
- [ ] Disagree
- [ ] Strongly disagree
- [ ] I do not know / No opinion

Monitoring

To what extent do the following statements related to the monitoring of supply correctly describe the challenges in this field?
a. Companies would benefit from public monitoring activities to inform them about risks of supply chains disruption.

<table>
<thead>
<tr>
<th>Strongly agree</th>
<th>Agree</th>
<th>Neutral</th>
<th>Disagree</th>
<th>Strongly disagree</th>
<th>I do not know / no opinion</th>
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b. Companies lack sufficient information on supply risks for them to take preventive measures.

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<thead>
<tr>
<th>Strongly agree</th>
<th>Agree</th>
<th>Neutral</th>
<th>Disagree</th>
<th>Strongly disagree</th>
<th>I do not know / no opinion</th>
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c. Companies generally do not have in place contingency plans to deal with supply disruptions.

<table>
<thead>
<tr>
<th>Strongly agree</th>
<th>Agree</th>
<th>Neutral</th>
<th>Disagree</th>
<th>Strongly disagree</th>
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d. Member State authorities do not have in place sufficient monitoring mechanisms allowing them to assess supply risks and anticipate problems.

<table>
<thead>
<tr>
<th>Strongly agree</th>
<th>Agree</th>
<th>Neutral</th>
<th>Disagree</th>
<th>Strongly disagree</th>
<th>I do not know / no opinion</th>
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e. Member State authorities do not sufficiently cooperate and coordinate in monitoring critical raw materials supply chains.

<table>
<thead>
<tr>
<th>Strongly agree</th>
<th>Agree</th>
<th>Neutral</th>
<th>Disagree</th>
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**EU value chain**

**To what extent do you agree that the following challenges affect the roll out of critical raw materials projects (mining, refining and recycling) in the EU?**

<table>
<thead>
<tr>
<th>Strongly agree</th>
<th>Agree</th>
<th>Neutral</th>
<th>Disagree</th>
<th>Strongly disagree</th>
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a. Difficulty to access private financing for critical raw materials projects.

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<thead>
<tr>
<th>Strongly agree</th>
<th>Agree</th>
<th>Neutral</th>
<th>Disagree</th>
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b. Difficulty to access public funding in the EU for critical raw materials projects.

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<thead>
<tr>
<th>Strongly agree</th>
<th>Agree</th>
<th>Neutral</th>
<th>Disagree</th>
<th>Strongly disagree</th>
<th>I do not know / no opinion</th>
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c. Lack of technical standards for processes along the critical raw materials value chain.

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<tr>
<th>Strongly agree</th>
<th>Agree</th>
<th>Neutral</th>
<th>Disagree</th>
<th>Strongly disagree</th>
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d. Fear of reputational damage for companies.

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<tr>
<th>Strongly agree</th>
<th>Agree</th>
<th>Neutral</th>
<th>Disagree</th>
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e. Lack of or limited public acceptance for new critical raw materials projects in EU.

<table>
<thead>
<tr>
<th>Strongly agree</th>
<th>Agree</th>
<th>Neutral</th>
<th>Disagree</th>
<th>Strongly disagree</th>
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<tr>
<td>Challenge</td>
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<td>f. Unfair competition from third countries.</td>
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<td>g. Price volatility and unpredictability.</td>
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<td>h. Lack of skilled workforce to design and operate critical raw materials projects.</td>
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<tr>
<td>i. Lack of available technologies to carry out critical raw materials projects in line with the required environmental standards.</td>
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</table>

If necessary, please further explain the consequences of the challenges encountered by critical raw materials projects, specifying for which stages of the value they apply. You can also specify any additional challenge not listed in the previous question.

**Permitting**
Do you agree with the following statements regarding the permitting procedures for critical raw materials projects?
Please specify which Member State or third country you refer to and for which type of projects (e.g. write "Country Y, recycling project" in the "Agree" box).

<table>
<thead>
<tr>
<th>Statement</th>
<th>Strongly agree</th>
<th>Agree</th>
<th>Neutral</th>
<th>Disagree</th>
<th>Strongly disagree</th>
<th>I do not know / No opinion</th>
</tr>
</thead>
<tbody>
<tr>
<td>a. National permitting requirements and processes are not clear for permitting applicants</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>X</td>
</tr>
<tr>
<td>b. National permitting processes are too lengthy</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>X</td>
</tr>
<tr>
<td>c. Permitting requirements on local, regional and national level are too different</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>X</td>
</tr>
</tbody>
</table>
Circularity

To what extent do you agree with the following statement regarding the circularity of critical raw materials projects in the EU?

<table>
<thead>
<tr>
<th>Statement</th>
<th>Strongly agree</th>
<th>Agree</th>
<th>Neutral</th>
<th>Disagree</th>
<th>Strongly disagree</th>
<th>I do not know / No opinion</th>
</tr>
</thead>
<tbody>
<tr>
<td>a. EU product legislation does not sufficiently incentivize the use of secondary raw materials in products.</td>
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<tr>
<td>b. EU waste legislation does not sufficiently incentivise the recovery and recycling of raw materials.</td>
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<tr>
<td>c. Shipments of waste containing critical raw materials between Member States are difficult, which limits possibilities for viable recycling projects.</td>
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<tr>
<td>d. Export of waste containing critical raw materials increases the shortage of critical raw materials in the EU and limits potential for circularity.</td>
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</tbody>
</table>

3) Possible measures to ensure a secure and sustainable supply of critical raw materials

**Strengthening the monitoring, risk management and governance for critical raw materials supply chain in Europe**

To strengthen the resilience of the supply chains of critical raw materials in the EU, new tools could be developed. To what extent do you agree that the following possible measures can help strengthen supply chain resilience?

<table>
<thead>
<tr>
<th>Possible Measures</th>
<th>Strongly agree</th>
<th>Agree</th>
<th>Neutral</th>
<th>Disagree</th>
<th>Strongly disagree</th>
<th>I do not know / No opinion</th>
</tr>
</thead>
<tbody>
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<td></td>
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</tr>
</tbody>
</table>
a. Enhanced cooperation between national authorities or agencies in charge of critical raw materials (data exchange, common monitoring, etc.).

<table>
<thead>
<tr>
<th>Strongly agree</th>
<th>Agree</th>
<th>Neutral</th>
<th>Disagree</th>
<th>Strongly disagree</th>
<th>I do not know / No opinion</th>
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</tbody>
</table>

b. A dedicated EU-wide governance capacity tasked with monitoring actions and strengthening the EU value chain.

<table>
<thead>
<tr>
<th>Strongly agree</th>
<th>Agree</th>
<th>Neutral</th>
<th>Disagree</th>
<th>Strongly disagree</th>
<th>I do not know / No opinion</th>
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<tbody>
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</tbody>
</table>

c. Better access for companies to monitoring information at EU or at national level to enable them to identify vulnerabilities in their supply chains.

<table>
<thead>
<tr>
<th>Strongly agree</th>
<th>Agree</th>
<th>Neutral</th>
<th>Disagree</th>
<th>Strongly disagree</th>
<th>I do not know / No opinion</th>
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</table>

d. Periodic supply chain stress testing of selected critical raw materials at EU level to better anticipate supply chain disruptions.

<table>
<thead>
<tr>
<th>Strongly agree</th>
<th>Agree</th>
<th>Neutral</th>
<th>Disagree</th>
<th>Strongly disagree</th>
<th>I do not know / No opinion</th>
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</table>

e. Early warnings by public authorities of imminent vulnerability of a supply chain.

<table>
<thead>
<tr>
<th>Strongly agree</th>
<th>Agree</th>
<th>Neutral</th>
<th>Disagree</th>
<th>Strongly disagree</th>
<th>I do not know / No opinion</th>
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</table>

f. Provisions to increase strategic stocks of critical raw materials at EU, national or industry level.

<table>
<thead>
<tr>
<th>Strongly agree</th>
<th>Agree</th>
<th>Neutral</th>
<th>Disagree</th>
<th>Strongly disagree</th>
<th>I do not know / No opinion</th>
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</table>

If you have suggestion of other measures to strengthen the resilience of the EU critical raw materials supply chains, please specify.

To ensure a better monitoring of critical raw materials, it would be useful for public authorities to monitor more closely:

<table>
<thead>
<tr>
<th>Strongly agree</th>
<th>Agree</th>
<th>Neutral</th>
<th>Disagree</th>
<th>Strongly disagree</th>
<th>I do not know / No opinion</th>
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</table>

a. Prices of critical raw materials.

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<tr>
<th>Strongly agree</th>
<th>Agree</th>
<th>Neutral</th>
<th>Disagree</th>
<th>Strongly disagree</th>
<th>I do not know / No opinion</th>
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</table>

b. Demand developments at national, European and global levels.

<table>
<thead>
<tr>
<th>Strongly agree</th>
<th>Agree</th>
<th>Neutral</th>
<th>Disagree</th>
<th>Strongly disagree</th>
<th>I do not know / No opinion</th>
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</tbody>
</table>
If you have suggestions of other areas to monitor, please specify.

Support the development of alternative supply chains.

Does your organisation (or organisations you represent) have any strategic stocks of critical raw materials?

- Yes
- No
- I do not know / Not applicable

How do you consider that efforts to increase strategic stocks should be organised?

- [ ] Mandatory storage or strategic stocks by industry.
- [ ] Mandatory storage or strategic stocks by Member States’ public bodies.
- [ ] EU level guidance on voluntary storage or strategic stocks to be organised at national level, as appropriate (by public and/or private actors).
- [ ] Storage or strategic stocks by an EU level body through joint procurement.
- [ ] EU level guidance on rationing/redistributing stocks.
- [ ] EU rules for mandatory redistribution of stocks in view of supply and demand.
- [ ] Other.

Please provide any qualitative and/or quantitative information to explain your choice(s) as regards strategic stocks. Specifically, what would be the cost/burden for you and/or your organisation?

Strengthening the critical raw materials supply chain in Europe

To what extent do you agree that the following policy options could help strengthen the EU critical raw materials value chain?
<table>
<thead>
<tr>
<th></th>
<th>Strongly agree</th>
<th>Agree</th>
<th>Neutral</th>
<th>Disagree</th>
<th>Strongly disagree</th>
<th>I do not know / No opinion</th>
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</thead>
<tbody>
<tr>
<td>a. A specific list of raw materials of strategic importance for the</td>
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<tr>
<td>EU (and thus deserving priority attention) to guide investment</td>
<td><strong>Strongly</strong></td>
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<tr>
<td>decisions of companies and financial institutions.</td>
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<tr>
<td>b. A specific list of raw materials of strategic importance for the</td>
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<td></td>
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<tr>
<td>EU (and thus deserving priority attention) to target public support</td>
<td><strong>Strongly</strong></td>
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<td>at EU and national level.</td>
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<tr>
<td>c. Setting EU objectives for increasing domestic production</td>
<td><strong>Strongly</strong></td>
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<tr>
<td>capacity along different stages of the value chain (exploration,</td>
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<td>extraction, refining, recycling) to guide national and European</td>
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<tr>
<td>efforts (i.e. in relation to the materials on the list mentioned</td>
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<td>under a.).</td>
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<tr>
<td>d. Identifying Strategic Projects across the critical raw materials</td>
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<td>value chain with strong environmental and social performance and</td>
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<td>contributing to reducing EU dependencies.</td>
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<tr>
<td>e. Ensuring that these Strategic Projects benefit from streamlined</td>
<td><strong>Strongly</strong></td>
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<tr>
<td>and quicker permitting procedures.</td>
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<tr>
<td>f. Ensuring that these Strategic Projects benefit from easier</td>
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<tr>
<td>access to public and private finance.</td>
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<tr>
<td>g. Ensuring that Strategic Projects and Partnerships initiatives</td>
<td></td>
<td></td>
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<tr>
<td>outside of the EU also benefit from de-risking if they comply</td>
<td><strong>Strongly</strong></td>
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<tr>
<td>with social and environmental standards and can contribute to</td>
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<tr>
<td>securing EU supply.</td>
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</tbody>
</table>
**Investment**

To what extent do you agree that the following policy options would facilitate access to finance for critical raw materials projects?

<table>
<thead>
<tr>
<th>Policy Option</th>
<th>Strongly agree</th>
<th>Agree</th>
<th>Neutral</th>
<th>Disagree</th>
<th>Strongly disagree</th>
<th>I do not know / No opinion</th>
</tr>
</thead>
<tbody>
<tr>
<td>a. Public support to bring together downstream users and project promoters to facilitate the conclusion of long-term supply contracts and offtake agreements.</td>
<td>![Strongly Agree]</td>
<td>![Agree]</td>
<td>![Neutral]</td>
<td>![Disagree]</td>
<td>![Strongly Disagree]</td>
<td>![I do not know / No opinion]</td>
</tr>
<tr>
<td>b. Target existing EU funds that have the possibility to finance critical raw materials projects of particular strategic relevance identified under the future legislation.</td>
<td>![Strongly Agree]</td>
<td>![Agree]</td>
<td>![Neutral]</td>
<td>![Disagree]</td>
<td>![Strongly Disagree]</td>
<td>![I do not know / No opinion]</td>
</tr>
<tr>
<td>c. Increased financial support from national and European promotional banks for critical raw materials projects.</td>
<td>![Strongly Agree]</td>
<td>![Agree]</td>
<td>![Neutral]</td>
<td>![Disagree]</td>
<td>![Strongly Disagree]</td>
<td>![I do not know / No opinion]</td>
</tr>
<tr>
<td>d. A dedicated financial platform to de-risk critical raw materials projects that meet certain requirements (e.g., high environmental and social standards, while contributing to EU supply) by blending private, national and EU funding.</td>
<td>![Strongly Agree]</td>
<td>![Agree]</td>
<td>![Neutral]</td>
<td>![Disagree]</td>
<td>![Strongly Disagree]</td>
<td>![I do not know / No opinion]</td>
</tr>
<tr>
<td>e. Explore opportunities offered by the existing State aid rules for critical raw materials projects, such as Important Projects of Common European Interest, State aid Framework for research, development and innovation, Regional Aid Guidelines, Guidelines on State aid for Climate, Environmental protection and Energy or relevant State aid General Block Exemption Regulation provisions.</td>
<td>![Strongly Agree]</td>
<td>![Agree]</td>
<td>![Neutral]</td>
<td>![Disagree]</td>
<td>![Strongly Disagree]</td>
<td>![I do not know / No opinion]</td>
</tr>
</tbody>
</table>
Do you foresee any other option to facilitate access to finance for critical raw materials projects?

Sustainability

Would you agree that products containing critical raw materials should be accompanied with information on the environmental footprint of producing those materials?
- Strongly agree
- Agree
- Neutral
- Disagree
- Strongly disagree
- I do not know / No opinion

Would you agree that products containing critical raw materials should be accompanied with information on the ethical sourcing of those materials?
- Strongly agree
- Agree
- Neutral
- Disagree
- Strongly disagree
- I do not know / No opinion

Which measures would you propose to increase resource efficiency and reduce the pressure on primary raw material consumption?

Set clear legislative requirements for the market uptake of critical raw materials recovered from intra-EU processes (for example phosphorous from organic sources) in order to de-risk investments in material recovery processes.
Substitution of critical raw materials is an important way to mitigate the demand needs. Which actions should be further pursued to develop substitution?

- [✓] Strengthened support for EU research and innovation funding on substitution.
- [ ] Strengthened cooperation across Member States on the research for substitution.
- [✓] Strengthened public-private cooperation on the deployment of substitution alternatives.
- [✓] Strengthened private-private cooperation (horizontal or vertical) on the development of substitution alternatives (in accordance with competition law and parameters).
- [ ] Other.

Which measures or techniques would contribute to lower the environmental impact of extraction?

[ ]

**Circularity**

Would the following measures help develop the market for secondary raw materials in the EU, hence lowering the pressure on demand for primary raw materials?

<table>
<thead>
<tr>
<th>Measure</th>
<th>Strongly agree</th>
<th>Agree</th>
<th>Neutral</th>
<th>Disagree</th>
<th>Strongly disagree</th>
<th>I do not know / no opinion</th>
</tr>
</thead>
<tbody>
<tr>
<td>a. Developing targets for waste operators related to the recycling efficiency of critical raw materials from different waste streams (electronics, vehicles, etc.).</td>
<td>[ ]</td>
<td>[✓]</td>
<td>[ ]</td>
<td>[ ]</td>
<td>[ ]</td>
<td>[ ]</td>
</tr>
<tr>
<td>b. Developing targets for waste operators related to the material recovery of critical raw materials from different waste streams (electronics, vehicles, mining waste etc.).</td>
<td>[ ]</td>
<td>[✓]</td>
<td>[ ]</td>
<td>[ ]</td>
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</tr>
</tbody>
</table>
c. Requiring Member State to design waste management plans including specific measures to promote the recovery of critical raw materials, from historical mining waste.


d. Setting design requirements for products containing critical raw materials to increase their ease of dismantling and recycling.


e. Setting minimum content of recycled critical raw materials in relevant products.


f. Setting design requirements for products containing critical raw materials to increase the length of product life.


g. Strengthening support for EU research and innovation funding on recycling and material recovery technologies for critical raw materials.


h. Strengthening exploration and documentation of critical raw materials in secondary deposits and waste streams.

Are there any other policy options that would facilitate the circularity of critical raw materials?

Develop end-of-waste criteria for materials recovered from waste streams including waste water.

International dimension

Securing the EU supply of critical raw materials implies further diversification of EU sourcing, given the present high concentration of origin of EU imports for many critical raw materials. The EU action plan on critical raw materials adopted in 2020 includes an action to develop partnerships with resource rich countries, with the aim of ensuring diversification of sourcing. The EU has already concluded Strategic Partnerships with third countries (with Canada and Ukraine) to further integrate the partner countries’ supply chain with the EU and is negotiating others.

In parallel, the EU has a vast network of trade agreements with important disciplines on export restrictions, investment facilitation etc. In addition, some finalised agreements (e.g. with UK) and ongoing negotiations (e.g. with Chile, Australia) include additional provisions on Energy and Raw materials in dedicated chapters.
To what extent do you agree with the following statements?

<table>
<thead>
<tr>
<th>Statement</th>
<th>Strongly agree</th>
<th>Agree</th>
<th>Neutral</th>
<th>Disagree</th>
<th>Strongly disagree</th>
<th>I do not know / No opinion</th>
</tr>
</thead>
<tbody>
<tr>
<td>a. The EU lacks a strategy for increasing the diversification of EU industry supplies from third countries.</td>
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<tr>
<td>b. The potential to extract critical raw materials from primary sources in third countries is currently underexploited.</td>
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<tr>
<td>c. The global processing and refining capacities for critical raw materials are currently insufficient.</td>
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<tr>
<td>d. The exchanges and cooperation between Third Countries and EU/ Member States authorities on critical raw materials (data exchange, common monitoring, etc.) are not sufficient.</td>
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<tr>
<td>e. The extraction of critical raw materials from primary sources in third countries contributes to environmental degradation.</td>
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</table>

To what extent do you agree that the following challenges affect the roll out of critical raw materials projects (mining, refining and recycling) in third countries?

<table>
<thead>
<tr>
<th>Challenge</th>
<th>Strongly agree</th>
<th>Agree</th>
<th>Neutral</th>
<th>Disagree</th>
<th>Strongly disagree</th>
<th>I do not know / No opinion</th>
</tr>
</thead>
<tbody>
<tr>
<td>a. Difficulty to access private financing for critical raw materials projects.</td>
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<tr>
<td>b. Difficulty to access public funding in third countries for critical raw materials projects.</td>
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<tr>
<td>c. Difficulty or undue delay to receive a permit for a critical raw materials project.</td>
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<tr>
<td>d. Lack of technical standards for processes along the critical raw materials value chain.</td>
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<td>e. Fear of reputational damage for companies.</td>
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<tr>
<td>f. Lack of or limited public acceptance for new critical raw materials projects in third countries.</td>
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<td>g. Unfair local competition from third countries.</td>
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<tr>
<td>h. Price volatility and unpredictability.</td>
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<tr>
<td>i. Lack of skilled workforce to design and operate critical raw materials projects.</td>
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<tr>
<td>j. Lack of available technologies to carry out critical raw materials projects in line with the required environmental standards.</td>
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What are the underlying reasons for supply chains disturbances and supply constraints of raw materials?

- Insufficient global production.
- Increased geopolitical tensions.
- Market manipulation.
- Volatile trading conditions.
- Untransparent market mechanisms.
- Other.

Please specify.

High energy (gas) prices affecting the economic viability of certain production processes in Europe.

To what extent do you agree that the following policy statements can help support the EU’s global efforts to secure critical raw materials?
### Questionnaire on Critical Raw Materials and Strategic Partnerships

<table>
<thead>
<tr>
<th>Statement</th>
<th>Strongly agree</th>
<th>Agree</th>
<th>Neutral</th>
<th>Disagree</th>
<th>Strongly disagree</th>
<th>I do not know / No opinion</th>
</tr>
</thead>
<tbody>
<tr>
<td>a. The EU should strengthen the ongoing strategic partnerships on critical raw materials and conclude additional ones with resource rich third countries</td>
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<td>b. Such partnerships should rely on clearly established pillars, such as the integration of raw materials value chain, research and innovation cooperation and alignment on environmental, social, and governance (ESG) criteria and standards.</td>
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<td>c. Partnerships on raw materials value chains with developing countries need to include a pillar for capacity building, skills and training and one for deploying infrastructure.</td>
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<td>d. The EU should diversify its global supply through its free-trade agreements and trade relations.</td>
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<td>e. The provisions (on investment, licencing and standardization) in dedicated Energy and Raw materials Chapters in the latest trade agreements have the necessary disciplines to unlock the potential in opening access and encouraging investment in raw materials.</td>
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</table>

If you have suggestions on other instruments that should be used to diversify the EU's global supply, please specify.

Which of the following barriers, often adopted by third countries, have the most trade distorting effect on your business?
<table>
<thead>
<tr>
<th></th>
<th>Strongly agree</th>
<th>Agree</th>
<th>Neutral</th>
<th>Disagree</th>
<th>Strongly disagree</th>
<th>I do not know/no opinion</th>
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</thead>
<tbody>
<tr>
<td>a. Export taxes.</td>
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<tr>
<td>b. Export licencing.</td>
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<td>c. Export pricing (dual pricing, minimum export prices).</td>
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<td>d. Denial of VAT tax rebates when exporting.</td>
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<td>e. Restrictions on customs clearance points for exports.</td>
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<td>f. Export monopolies / qualified exporters lists.</td>
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<td>g. Domestic market obligations.</td>
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<td>h. Other trade barriers.</td>
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</table>

**Skills**

A skilled workforce is indispensable to the strengthening of the EU value chain. In your opinion, which public action (at local, national or European levels) could help tackle the skills challenge of the EU raw materials value chain?

**Impacts**

Please specify from the possible measures mentioned in this consultation the ones with the likely highest impact on your organization, and specify, possibly quantitatively, the potential costs and/or benefits. Costs and benefits can relate, for example, to administrative or financial burden or improved business opportunities.

If you wish to share any further information or opinion on the one of topics raised above, please do so below:
The definition of critical raw materials must be extended to include all raw materials needed to provide critical entities (as defined in the future Critical Entities Resilience Directive) with the materials they need to fulfill their societal tasks. This must include materials needed to recover critical raw materials. Critical Entities will have to implement risk assessment and risk management measures. Disrupted supply chains for key treatment materials is a substantial risk, but often beyond the control of the critical entity. A coordinated policy approach is necessary.

To share information relevant to this survey, please upload your file(s).

Only files of the type pdf, txt, doc, docx, odt, rtf are allowed

Thank you for the time taken to participate to this survey.

Contact
Grow-i1@ec.europa.eu