



European Precious Metals  
Federation

PRECIOUS METALS, ALL AROUND YOU.



## THE EPMF'S KEY ASKS

for the European Parliament and  
European Commission

**Precious metals are widely used in our daily life.** They make our lives more enjoyable, safer, productive, and healthier. Mobile phones, solar panels, hydrogen fuel cells, and medical devices are just a few applications. High conductivity, high melting points, physical and chemical resistance, the ability to catalyse chemical reactions, and optical qualities – make precious metals indispensable for green technologies and digitalisation. Precious metals enable a cleaner environment today, and their importance will only grow further as Europe leads the world in transitioning to a low-carbon economy.

In 2024, the European Parliament and European Commission will have new leadership for the upcoming five years, setting rules and goals for its industry and citizens. The EPMF priorities remain the same: strong growth in industrial development, support for the EU's greening and net-zero policies and ensuring regulatory coherence and predictability. Allow the EPMF to guide you through the priorities and key recommendations from the precious metals sector.

## The Antwerp Declaration: call for the European Industrial Deal

The EPMF co-signed the [Antwerp Declaration](#) to express its full support for a European Industrial Deal that complements the Green Deal and retains high-quality jobs for European workers. There is an urgent need for clarity, predictability, and confidence in Europe and its industrial policy. The EPMF, along with more than 1,000 signatories, called for the appointment of a Vice President responsible for delivering the European Industrial Deal, seamlessly integrating legislation aligned with the new European Commission's agenda, and overseeing the key Director Generals in one integrated approach.

### THE EPMF'S AMBITION

Science is the key! The EPMF always favours science-based regulatory decision-making to avoid presumptions. Good quality information is indispensable for sound regulatory decisions.



### **OUR KEY ASKS** to Member State Governments, the European Commission and the European Parliament

- Put the Industrial Deal at the core of the new European Strategic Agenda for 2024-2029.
- Include a robust public funding chapter.
- Make Europe a globally competitive provider of energy, e.g. increase uptake of renewable energy through the promotion of Power Purchase Agreements.
- Improve the EU's raw materials security, e.g. swift implementation of CRMA and NZIA, coherence of policy actions.
- Boost demand for net zero, low carbon and circular products, e.g. strong ESG criteria in public procurement.
- Leverage, enforce, revive and improve the Single Market, e.g. more harmonisation on remaining issues of the Waste Shipments Regulation: rapid implementation, automatic tacit consent, boost collection and recycling of critical raw materials.

# The Critical Raw Materials Act

The Critical Raw Materials Act (CRMA) has reached its implementation status. The CRMA is paramount to the EU's greening and digital progression, especially within the scope of other EU initiatives, e.g., REPowerEU, The Green Deal Industrial Plan, and The Net-Zero Industry Act. Thanks to crucial provisions in the CRMA, such as streamlining permitting projects, the EU can achieve certainty and availability of critical raw materials for Europe's strategic independence. However, today, precious metals operations and projects are challenged by high energy prices, unpredictable chemicals rules, and the risk of dumping from subsidised imports.



## THE EPMF'S AMBITION

To increase the awareness and understanding of the environmental impact, importance and advantages of precious metals use and recycling.



## OUR KEY ASKS *from the CRMA*

- Tangible actions and an expedited implementation of the CRMA. The EU precious metals sector requests certainty and predictability around business projects. The provisions set up in the CRMA should be easily achievable and not hampered by lengthy, burdensome application processes.
- Effective implementation of the EU waste policy framework to boost the collection and sorting of products containing precious metals and guarantee high-quality recycling. Meticulous recycling will be pivotal in the supply and availability of platinum group metals (PGMs) and other critical, strategic raw materials.
- Always consider consistency with other EU policies in particular the REACH revision.
- Introduce a flagship Industrial Deal that improves the fundamental business case for Europe's strategic industries, led by a new First Vice President. More in the [Eurometaux Manifesto](#).

## #PRECIUSMETALS FACT

Almost all technologies prioritised in the Net-Zero Industry Act, e.g. wind turbines, solar PV systems, batteries, grid technologies, and hydrogen electrolyzers, require an increased supply of precious metals.

# Chemicals Management: REACH revision

The REACH revision and an effective chemicals management are top priorities for the EPMF. The REACH revision has been put on hold despite significant positive progress was made for the precious metals industry. Hence, we will continue to work on the REACH revision with the new European Parliament and European Commission.

## **OUR KEY ASKS** from the REACH revision

- More transparency and predictability in the various REACH processes.
- An increase in data requirements (hazard and exposure) must be well thought out and prioritised based on what matters.
- The chemicals risk management phase should start with a transparent prioritisation system to facilitate data collection and predictability.
- Risk management under REACH should remain risk-driven and consider exposure potential in addition to hazard.
- Safer and more sustainable alternatives within a lifecycle approach should be considered to avoid inappropriate substitution.
- Ensure the specificities of precious metals and metals in general are considered.

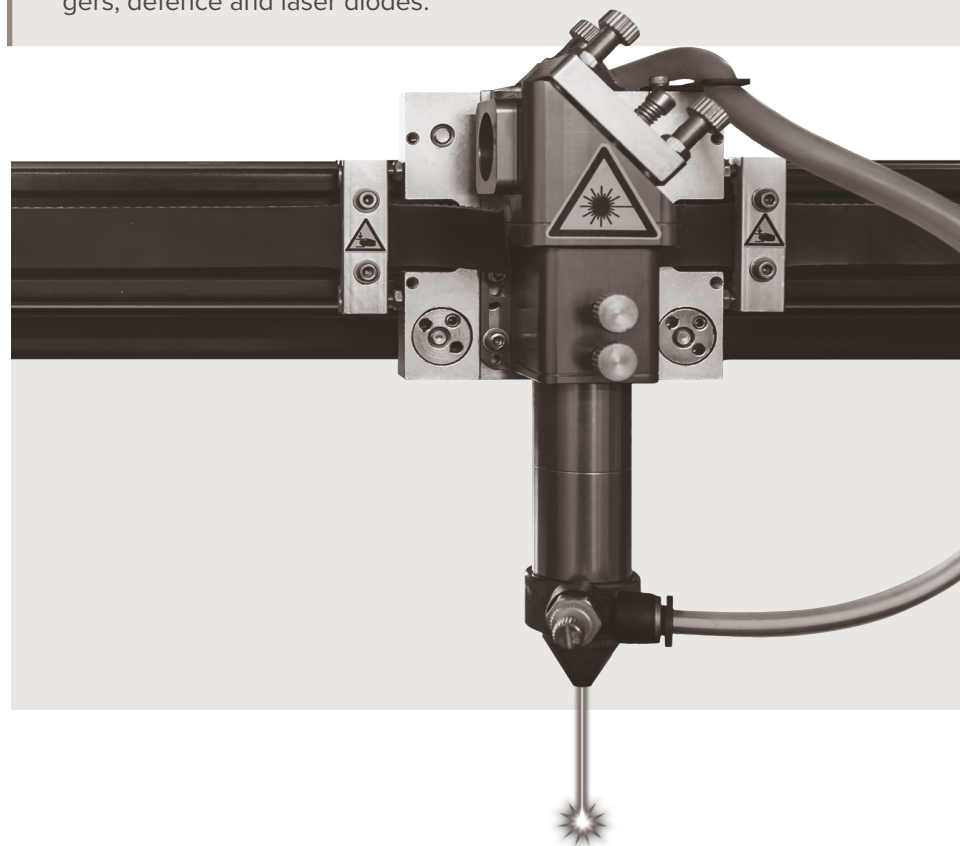
### THE EPMF'S AMBITION

A risk-controlled environment through the life-cycle of precious metals, from sourcing, production, and use to recycling.



### #PRECIUSMETALS FACT

Precious metals and their substances are used on an industrial level and for niche applications, including aerospace, electric vehicle (EV) fast chargers, defence and laser diodes.



# Circular Economy: Waste Policies

The revision of the Waste Shipment Regulation (WSR) is one of the main initiatives under the Circular Economy Action Plan. It aims to ease shipments of waste for reuse and recycling in the EU to support the transition to a circular economy by ensuring that waste exported from the EU is managed in an environmentally sound manner in the destination countries and shifting to digital solutions. As WSR was adopted in 2024, it is time for its implementation across the EU Member States.

## OUR KEY ASKS from the WSR

- Waste policies are of utmost importance to the precious metals sector. The industry's main challenges are the need for more information about substances of concern in products and waste, their presence in recycled products, and difficulties in applying EU waste classification methodologies.
- One of the remaining issues for the EPMF within the current WSR is primarily related to the pre-consented facilities. The EPMF asks that (i) the status of the pre-consented facilities should be accepted across the Member States and (ii) for the provision of automatic recognition of pre-consented status issued by a Competent Authority in one Member State by all EU Member States.
- Rapid implementation of the new measures such as Electronic Data Interchange to guarantee more efficient and fast intra-EU waste shipments.

## #PRECIOUSMETALS FACT

Recycled platinum provides a sustainable and economically viable secondary source of one of the world's most limited natural materials, ensuring the lowest possible environmental impact.

## THE EPMF'S AMBITION

Waste is a resource, and the EPMF aims to increase public understanding of how precious metals contribute to the circular economy. Precious metals can be recycled ad infinitum without losing their intrinsic properties and are critical to sustainable product design in the circular economy.





# Responsible Sourcing: EU Conflict Minerals Regulation

The EU Conflict Minerals Regulation (EU CMR) controls trade in minerals from conflict areas. It establishes a supply chain due diligence obligation system for EU importers of tin, tantalum, tungsten, and gold (3TG). The Regulation explicitly prioritises responsible sourcing and targets the use of minerals in financing armed groups, forced labour and other human rights abuses. EU companies must ensure they import only minerals and metals from responsible sources. The EU Regulation is fully applicable from January 1, 2021, and in 2024, a report on the functioning and effectiveness of the Regulation will be available. This report will serve as a basis for the upcoming revision by the end of 2026.

## OUR KEY ASKS from the EU CMR

- The Regulation requires a more in-depth involvement of the entire supply chain rather than focusing exclusively on (upstream) EU importers. The EPMF recommends extending the regulatory scope to include up and downstream operators.
- Lower the gold threshold to cover all gold imports that fall within the scope of the Regulation, effectively following already established industry initiatives. The current 100kg regulation trigger for gold ores and concentrates risks weakening the standards, potentially resulting in reputational consequences for the industry.
- Move forward with the recognition of the supply chain due diligence schemes.
- Coherence with other EU legislation, especially regarding due diligence obligations and standards.

### THE EPMF'S AMBITION

More ambitious EU Conflict Minerals Regulation, a level playing field for global regulation and better rule-enforcement.



### #PRECIOUSMETALS FACT

Gold is used in both the diagnosis and treatment of cancer. Gold can be tracked through the human body to screen, investigate, and diagnose cancerous cells. The gold particles are injected into tissue as a radiation source during chemotherapy treatment.

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