



EPMF position on the Critical Raw Materials Act (CRMA)

12 December 2023

The Critical Raw Materials Act (CRMA) was adopted today with majority of votes. The EPMF welcomes and strongly supports this EU initiative. The CRMA is of **paramount importance** for the EU's greening and digital progressions, especially in the scopes of other EU initiatives, e.g. REPowerEU, The Green Deal Industrial Plan, The Net-Zero Industry Act. Almost all technologies prioritised in the latter (wind turbines, solar PV systems, batteries, grid technologies, hydrogen electrolyzers) require an increased supply of precious metals.

Certainty and availability of critical raw materials for Europe's strategic independency can be achieved thanks to some important provisions in the CRMA, such as the streamlining of permitting projects. However, achieving the CRMA's targets will require concrete follow-up actions to address the other structural challenges facing upstream industrial activities in Europe. Metals operations and projects today remain challenged by high energy prices, unpredictable chemicals rules, and the risk of dumping from subsidised imports.

However, the EPMF regrets to see **no reference to consistency with other EU policies**, and especially **the REACH revision**. Why **coherence is needed**? - Not only Platinum Group Metals (PGMs) but other non-ferrous metals are strategic and critical raw materials due to their increased demand in energy and digital transitions. However, solar PV, wind turbines, hydrogen fuel cells, power cables, and digital technologies all contain metals with a defined hazard. The EU's chemicals legislation is removing certainty for new investments into refining and recycling capacity for several strategic raw materials. As an example, the ongoing classification decisions and/or risk management procedures covering several strategic metals: e.g. lead prioritisation process under Authorisation (needed for precious metals recycling). Regulatory processes take 5-10 years to be completed, which removes certainty vs other regions, very often without any environmental benefit. There is a strong need to ensure business operations through clear and predictable risk management from the EU chemicals policy.

In practice, the CRMA must ensure that metals in the EU raw materials agenda are not caught up in long, unpredictable, and hazard-driven regulatory processes, not fitting their risk profile. Access to raw materials and adequate chemicals management must work hand in hand



without hampering each other. Besides, without the fast and timely implementation process, there is a high risk to see critical investments in raw materials in the EU being delayed due to long processes followed by an uncertain or disproportionate outcome.

ABOUT THE EPMF

Since 2007, the European Precious Metals Federation has supported European companies working with gold, silver, rhenium, and the six metals referred to as the Platinum Group including platinum, palladium, osmium, rhodium, ruthenium, and iridium.

Our 35 Member Companies and 3 national associations include world leaders in extraction, refining, and recycling of precious metals. They also include a highly diverse range of companies involved in consumer and industrial applications that touch the lives of European citizens from jewelry to financial investments to the mobile phones in their pockets to the catalytic converters in their vehicles to the solar panels and rapid chargers at their homes.

As the European body for advocacy, the EPMF facilitates the interface between policy makers, regulatory authorities, and the precious metals industry on a wide range of issues.