



The European Precious Metals Federation (EPMF) position on the European Critical Raw Materials Act

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The EPMF welcomes and supports the European Commission's Critical Raw Materials Act (CRM Act). However, we regret that silver has not been added to the critical/strategic raw materials list and we sincerely hope that the current list will expand at the next stage to rightly cover the full range of metals needed for the twin transition. Silver is as critical and strategic as Platinum Group Metals (PGMs) in many industrial, medical, chemical, electronic and green applications (*for more information please see Annex*). These precious metals are used in a wide range of applications, and there is currently no technically feasible alternative. Therefore, silver must be included in the list on the same ground than PGMs. The CRM Act 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 CRM Act such as the streamlining of permitting projects. However, achieving the Act'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.

Therefore, the EPMF strongly supports:

- **tangible actions and speed for the implementation** of the CRM Act. The provisions set up in the CRM Act should be easily achievable and not scattered in long and burdensome application processes. The EU precious metals sector is asking for more certainty and predictability for business projects.
- the **reference to consistency with other EU policies**. The EPMF suggests paying special attention to this issue and, especially to **the coherence with the REACH revision**. PGMs and silver are strategic and critical raw materials due to their increased demand in energy and digital transitions. 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: i) silver classification process, and ii) 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. The EPMF welcomes some references to Chemicals management and REACH in the proposal but this needs to be further clarified to ensure for business predictability and thorough risk management from EU chemicals policy. EPMF is eager to see this point confirmed at the next stage of the legislative process and EPMF encourages to incorporate the Critical Raw Materials Act's list of strategic/critical raw materials in the REACH revision.



In practice, the Critical Raw Materials Act 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.

ANNEX

- **Silver** has the lowest contact resistance and the highest electrical and thermal conductivity of all metals. Hence, the manufacture and and/or import of the silver and silver compounds feed into a variety of different downstream uses: i) electronics and electrical equipment (EEE) – used in consumer applications, industrial applications, automotive use, green energy (including solar and wind), rapid charging – stations and in-road applications, and certain types of electrodes all require silver; ii) aerospace and defence – the aerospace and defence industry, including uses that feed into aeroplanes, satellites and defence applications (e.g. missiles and torpedoes); iii) medical devices – medical devices and in-vitro diagnostic (IVD) medical devices; iv) water purifiers - silver ions are being added to water purification systems in hospitals, community water systems, pools and spas. Silver also helps to prevent Legionnaires' disease, which is caused by build-up in pipes, connections and water tanks. Silver prevents bacteria and algae from building up in the filters to get rid of bacteria, chlorine, trihalomethanes, lead, particulates and odor; v) hygiene – silver, in concert with oxygen, acts as a powerful sanitizer that offers an alternative to, or an augmentation of, other disinfectant systems, vi) photographic – healthcare (X-rays) and for aerospace and defence (Non-Destructive Testing).
- **Platinum Group Metals (platinum, palladium, osmium, rhodium, ruthenium, and iridium (PGMs))** are used in catalytic converters for cars, buses, trucks, and other industrial processes. PGMs convert the emissions from the internal combustion engine into less harmful gases as they pass through the emission control system. In healthcare, platinum is used in pacemakers and defibrillators. Platinum compounds are used in chemotherapy to treat cancers. Platinum and Iridium will assume a particularly important role in the production of hydrogen as a clean energy source. It is the catalyst material used in the proton exchange membrane (PEM) electrolysis process to produce green hydrogen if the electricity input is harnessed from green renewable energy sources. Palladium is used in electronics, dentistry, medicine, hydrogen purification, chemical applications and groundwater treatment. Platinum is a key component of fuel cells, in which hydrogen and oxygen react to produce electricity, heat, and water. PGMs are on the Critical Raw Materials list since its first publication in 2011.

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.