



Position on Critical Raw Materials Act

Where transport, energy and digital meet ...



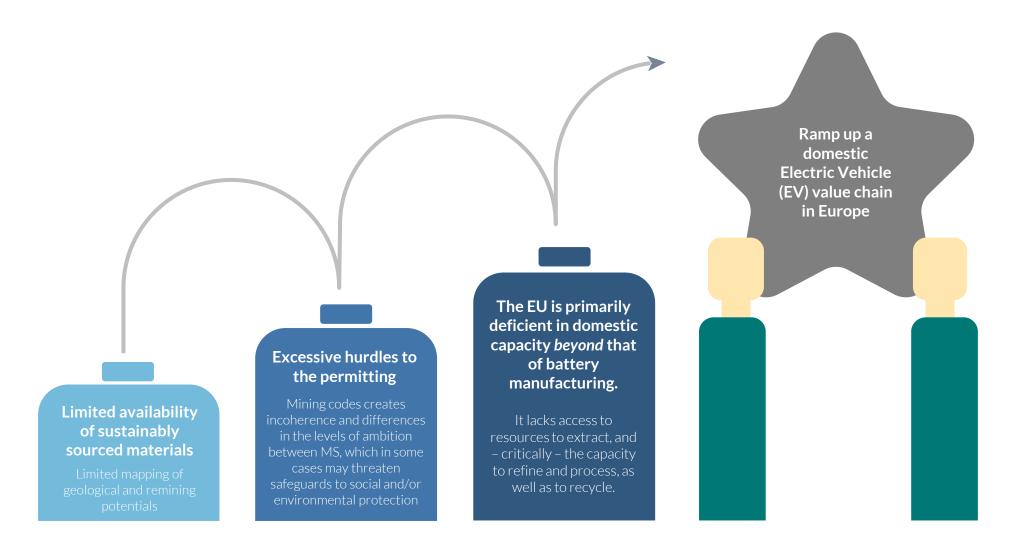
A multimodal, multisector alliance promoting a quick but sustainable and socially responsible electrification of transport.





Three clear flaws for Europe on CRMs

Whilst certain Critical Raw Materials (CRMs) are accessible on the EU territory, Europe remains largely dependent on third countries for mining, processing, refining and recycling.



Hierarchy of priorities for sourcing e-mobility



1/ Recycling, sustainable and secondary sourcing

High circularity potential of electric mobility materials



A clear and homogeneous framework for waste regulation is also needed to encourage reuse and recycling

Internal market for second-hand materials

Well-functioning internal market for second-hand raw materials would make it easier to implement recycling, repurposing and reuse activities in strategic value chains.

Level-playing field

Not all recycling activities are currently financially viable, due to the low cost of some primary resources and the lack of availability of recyclable materials.

Additional measures should also be considered to make it easier for recycling companies to access **black mass** from European operations.

Secondary raw materials

Mechanisms to incentivise the use of secondary raw materials should be introduced

2/ Sustainable (re)mining in Europe

While repurposing should always be the preferred option to uphold resources, and while mining is a topic to handle with care and consideration for local and social contexts, it is nevertheless important to consider the full value chain.



Remining

Efforts should be made to map this potential and its environmental impact in Europe and subsequently to increase the availability of secondary raw materials

Support geological surveys

Ensure fundings especially for national mapping and prospective activities.

Make national exploration plans publicly accessible.

De-risk domestic sustainable extraction projects

through an EU-wide financial risk mitigation framework, which will ensure investment certainty.



3/ Considerations for international sourcing

When solutions for European sourcing (from repurposing, recycling, to remining and mining) are insufficient to meet demand, various options for sourcing CRM internationally should be considered.





International free trade agreements

due diligence must be a basis for negotiating FTAs or strategic partnerships.



Acquiring mining capacities in third countries

Supporting European stakeholders to directly invest in third countries sourcing capabilities should not be ignored



When using such opportunities, the highest environmental and social standards in third countries should be safeguarded or implemented.

Improvements to the proposals

In general for these reasons, the CRMs Act proposed by the European Commission is a welcome initiative that can help to ensure the sustainable supply of critical raw materials. However, the following improvements should be considered by co-legislators:





Environmental standards

Support of strategic projects but ensure the corporate sustainability due diligence

Clarify rule on environmental footprint of CRMs



The risks of stockpiling

Risk artificially inflating prices, which will undermine the development of those European producers of value-added goods who are dependent on these C.R.M.s.



Skills for the transition

Skills shortages are particularly acute for geology and low-environmentalimpact mining specialties

Skills-based visa schemes for raw material professionals currently based in 3rd countries may help fill existing human capital shortages in the short term



European Critical Raw Materials Board

Civil society should be represented in the CRM governance for a multistakeholder representation.

Thank you for your attention

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