

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

Johan

* Surname

Lindahl

* Email (this won't be published)

lindahl@esmc.solar

* Organisation name

255 character(s) maximum

European Solar Manufacturing Council

* 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.

421495541254-57

* 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.

- | | | | |
|--------------------------------------|--|-------------------------------------|--|
| <input type="radio"/> Afghanistan | <input type="radio"/> Djibouti | <input type="radio"/> Libya | <input type="radio"/> Saint Martin |
| <input type="radio"/> Åland Islands | <input type="radio"/> Dominica | <input type="radio"/> Liechtenstein | <input type="radio"/> Saint Pierre and Miquelon |
| <input type="radio"/> Albania | <input type="radio"/> Dominican Republic | <input type="radio"/> Lithuania | <input type="radio"/> Saint Vincent and the Grenadines |
| <input type="radio"/> Algeria | <input type="radio"/> Ecuador | <input type="radio"/> Luxembourg | <input type="radio"/> Samoa |
| <input type="radio"/> American Samoa | <input type="radio"/> Egypt | <input type="radio"/> Macau | <input type="radio"/> San Marino |
| <input type="radio"/> Andorra | <input type="radio"/> El Salvador | <input type="radio"/> Madagascar | <input type="radio"/> São Tomé and Príncipe |
| <input type="radio"/> Angola | <input type="radio"/> Equatorial Guinea | <input type="radio"/> Malawi | <input type="radio"/> Saudi Arabia |
| <input type="radio"/> Anguilla | <input type="radio"/> Eritrea | <input type="radio"/> Malaysia | <input type="radio"/> Senegal |
| <input type="radio"/> Antarctica | <input type="radio"/> Estonia | <input type="radio"/> Maldives | <input type="radio"/> Serbia |

- Antigua and Barbuda
- Argentina
- Armenia
- Aruba
- Australia
- Austria
- Azerbaijan
- Bahamas
- Bahrain
- Bangladesh
- Barbados
- Belarus
- Belgium
- Belize
- Benin
- Bermuda
- Bhutan
- Bolivia
- Bonaire Saint Eustatius and Saba
- Bosnia and Herzegovina
- Botswana
- Bouvet Island
- Brazil
- British Indian Ocean Territory
- British Virgin Islands
- Eswatini
- Ethiopia
- Falkland Islands
- Faroe Islands
- Fiji
- Finland
- France
- French Guiana
- French Polynesia
- French Southern and Antarctic Lands
- Gabon
- Georgia
- Germany
- Ghana
- Gibraltar
- Greece
- Greenland
- Grenada
- Guadeloupe
- Guam
- Guatemala
- Guernsey
- Guinea
- Guinea-Bissau
- Guyana
- Mali
- Malta
- Marshall Islands
- Martinique
- Mauritania
- Mauritius
- Mayotte
- Mexico
- Micronesia
- Moldova
- Monaco
- Mongolia
- Montenegro
- Montserrat
- Morocco
- Mozambique
- Myanmar/Burma
- Namibia
- Nauru
- Nepal
- Netherlands
- New Caledonia
- New Zealand
- Nicaragua
- Niger
- Seychelles
- Sierra Leone
- Singapore
- Sint Maarten
- 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
- Tanzania
- Thailand
- The Gambia

- 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
- Nigeria
- Niue
- Norfolk Island
- Northern Mariana Islands
- North Korea
- North Macedonia
- 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
- Timor-Leste
- 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

- Czechia
- Lebanon
- Saint Helena
Ascension and
Tristan da Cunha
- Zambia
- Democratic
Republic of the
Congo
- Lesotho
- Saint Kitts and
Nevis
- Zimbabwe
- Denmark
- Liberia
- Saint Lucia

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.
- Recovery and recycling of critical raw materials (production of secondary raw materials).
- 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 specify in your activities.

The European Solar Manufacturing Council represents 50 companies within the European PV manufacturing industry, from wafer to module production, equipment and research.

2) Challenges for securing sustainable supply of critical raw materials

General Challenges

To what extent do you agree with the following statements?

	Strongly agree	Agree	Neutral	Disagree	Strongly disagree	I don't know / no opinion
a. The potential to extract critical raw materials from primary sources in the EU is currently underexploited.	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
b. The EU's processing and refining capacities for critical raw materials are currently insufficient.	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
c. The potential to re-use or recycle critical raw materials from waste is currently underexploited in the EU.	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
d. The potential to diversify the EU's external supply of critical raw materials is currently underexploited.	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

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

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.

Metallurgical silicon, polysilicon, wafers, silver and glass for the European PV industry

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.

PV modules and inverters

d. You agree or strongly agree that the potential to diversify the EU's external supply of critical raw materials is currently underexploited. Please specify for which critical raw material(s) this is the case.

The material supply, polysilicon, wafers and glass, for the global PV industry is almost exclusively controlled by one country, namely China, which in addition plays with prices to destroy any competition. European production is normally more sustainable, both with respect to social standards as well as environmental, but there is need for investments to reach the desired volumes.

Current EU Policies

To what extent do you agree that the **existing EU policy actions** contribute to secure the EU's supply of critical raw materials?

	Strongly agree	Agree	Neutral	Disagree	Strongly disagree	I don't know / no opinion
a. Establishing and updating the critical raw materials list.	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
b. Developing the European Raw Materials Alliance.	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
c. Concluding Strategic partnerships with resource rich third countries.	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
d. Developing a transparent and stable trade framework for facilitating trade in raw materials, including through free trade agreements with resource rich third countries.	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
e. Funding research and innovation on resource efficiency, recycling and substitution of critical raw materials through Horizon Europe.	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
f. Developing and coordinating knowledge through research projects, such as the raw materials information system (https://rmis.jrc.ec.europa.eu/).	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

Supply chain vulnerability

Monitoring

To what extent do the following statements related to the monitoring of supply correctly describe the challenges in this field?

	Strongly agree	Agree	Neutral	Disagree	Strongly disagree	I do not know / no opinion
a. Companies would benefit from public monitoring activities to inform them about risks of supply chains disruption.	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
b. Companies lack sufficient information on supply risks for them to take preventive measures.	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
c. Companies generally do not have in place contingency plans to deal with supply disruptions.	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
d. Member State authorities do not have in place sufficient monitoring mechanisms allowing them to assess supply risks and anticipate problems.	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
e. Member State authorities do not sufficiently cooperate and coordinate in monitoring critical raw materials supply chains.	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

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?

	Strongly agree	Agree	Neutral	Disagree	Strongly disagree	I do not know / no opinion
a. Difficulty to access private financing for critical raw materials projects.	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

b. Difficulty to access public funding in the EU for critical raw materials projects.	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
c. Lack of technical standards for processes along the critical raw materials value chain.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
d. Fear of reputational damage for companies.	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
e. Lack of or limited public acceptance for new critical raw materials projects in EU.	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
f. Unfair competition from third countries.	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
g. Price volatility and unpredictability.	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
h. Lack of skilled workforce to design and operate critical raw materials projects.	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
i. Lack of available technologies to carry out critical raw materials projects in line with the required environmental standards.	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

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.

Solar PV is completely dependent on polysilicon and silver and highly dependent on glass. Technology changes are highly complex also due to quality standards that don't easily allow technology changes like the replacement of glass. Producing polysilicon or glass in Europe is doable but cost competitiveness is a challenge.

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).

	Strongly agree	Agree	Neutral	Disagree	Strongly disagree	I do not know / No opinion
a. National permitting requirements and processes are not clear for permitting applicants						No opinion
b. National permitting processes are too lengthy	Valid in most EU countries					
c. Permitting requirements on local, regional and national level are too different	Valid in most EU countries					

Investment

In your opinion, what are the main reasons for which critical raw materials projects have difficult access to private finance?

- Length and complexity of the permitting process.
- Lack of support at the level of public financial institutions.
- Lack of business case due to unfair competition from third countries.
- Lack of business case due to uncertain profitability caused by price volatility and an unstable market environment.
- Reputational risks linked to social and/or sustainability concerns.
- Higher production cost in the EU.
- Other reasons.

Please specify for which stage(s) of the value chain this challenge applies (exploration, extraction, processing/refining or recycling)

In case of the PV industry, China is subsidizing their polysilicon industry in all of the steps, exploration, extraction, processing/refining by cheap/free land, subsidized loan rates, utility subsidies on electricity and water, relaxed labor laws and no input credits. We also would need a production dedicated to the technologies we want to sell, not the technologies the Chinese produce. European production is normally more sustainable, both with respect to social standards as well as environmental issues. The industry in EU is still not mature, and need help to establish. EU normally focus on R&D funding, but incentives to have a more levelized playing field are essential.

Circularity

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

	Strongly agree	Agree	Neutral	Disagree	Strongly disagree	I do not know / No opinion
a. EU product legislation does not sufficiently incentivize the use of secondary raw materials in products.	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
b. EU waste legislation does not sufficiently incentivise the recovery and recycling of raw materials.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

c. Shipments of waste containing critical raw materials between Member States are difficult, which limits possibilities for viable recycling projects.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
d. Export of waste containing critical raw materials increases the shortage of critical raw materials in the EU and limits potential for circularity.	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

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?

	Strongly agree	Agree	Neutral	Disagree	Strongly disagree	I do not know / No opinion
a. Enhanced cooperation between national authorities or agencies in charge of critical raw materials (data exchange, common monitoring, etc.).	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
b. A dedicated EU-wide governance capacity tasked with monitoring actions and strengthening the EU value chain.	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
c. Better access for companies to monitoring information at EU or at national level to enable them to identify vulnerabilities in their supply chains.	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
d. Periodic supply chain stress testing of selected critical raw materials at EU level to better anticipate supply chain disruptions.	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

e. Early warnings by public authorities of imminent vulnerability of a supply chain.	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
f. Provisions to increase strategic stocks of critical raw materials at EU, national or industry level.	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

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

use trade defense mechanisms faster when needed without the need for companies to raise complaints

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

	Strongly agree	Agree	Neutral	Disagree	Strongly disagree	I do not know / No opinion
a. Prices of critical raw materials.	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
b. Demand developments at national, European and global levels.	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
c. Supply developments of critical raw materials (including forecasting).	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
d. Trade flows of critical raw materials.	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
e. Progress of important critical raw materials projects in the EU.	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

If you have suggestions of other areas to monitor, please specify.

scan Horizon Europe potential to identify future raw materials concerns

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?

Asking the PV industry to constitute stocks would be a major financial burden in an already super competitive industry.

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?

	Strongly agree	Agree	Neutral	Disagree	Strongly disagree	I do not know / No opinion
a. A specific list of raw materials of strategic importance for the EU (and thus deserving priority attention) to guide investment decisions of companies and financial institutions.	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
b. A specific list of raw materials of strategic importance for the EU (and thus deserving priority attention) to target public support at EU and national level.	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

c. Setting EU objectives for increasing domestic production capacity along different stages of the value chain (exploration, extraction, refining, recycling) to guide national and European efforts (i.e. in relation to the materials on the list mentioned under a.).	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
d. Identifying Strategic Projects across the critical raw materials value chain with strong environmental and social performance and contributing to reducing EU dependencies.	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
e. Ensuring that these Strategic Projects benefit from streamlined and quicker permitting procedures.	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
f. Ensuring that these Strategic Projects benefit from easier access to public and private finance.	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
g. Ensuring that Strategic Projects and Partnerships initiatives outside of the EU also benefit from de-risking if they comply with social and environmental standards and can contribute to securing EU supply.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

Investment

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

	Strongly agree	Agree	Neutral	Disagree	Strongly disagree	I do not know / No opinion
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<p>a. Public support to bring together downstream users and project promoters to facilitate the conclusion of long-term supply contracts and offtake agreements.</p>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
<p>b. Target existing EU funds that have the possibility to finance critical raw materials projects of particular strategic relevance identified under the future legislation.</p>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
<p>c. Increased financial support from national and European promotional banks for critical raw materials projects.</p>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
<p>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.</p>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
<p>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.</p>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
<p>f. Support a level playing field to promote transparency and good governance with partner countries, aiming to gather sustainable and responsible investments and partnerships in the sector.</p>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Do you foresee any other option to facilitate access to finance for critical raw materials projects?

Strengthen the European manufacturing industries that uses the critical raw materials, so that there is a strong home market for these actors. For this, investments to reach the desired volumes is needed.

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?

Regulations that set standards for quality and long life-time of products that contain critical raw materials

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?

	Strongly agree	Agree	Neutral	Disagree	Strongly disagree	I do not know / no opinion
a. Developing targets for waste operators related to the recycling efficiency of critical raw materials from different waste streams (electronics, vehicles, etc.).	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
b. Developing targets for waste operators related to the material recovery of critical raw materials from different waste streams (electronics, vehicles, mining waste etc.).	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
c. Requiring Member State to design waste management plans including specific measures to promote the recovery of critical raw materials, from historical mining waste.	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
d. Setting design requirements for products containing critical raw materials to increase their ease of dismantling and recycling.	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
e. Setting minimum content of recycled critical raw materials in relevant products.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

f. Setting design requirements for products containing critical raw materials to increase the length of product life.	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
g. Strengthening support for EU research and innovation funding on recycling and material recovery technologies for critical raw materials.	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
h. Strengthening exploration and documentation of critical raw materials in secondary deposits and waste streams.	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

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

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?

	Strongly agree	Agree	Neutral	Disagree	Strongly disagree	I do not know / No opinion
a. The EU lacks a strategy for increasing the diversification of EU industry supplies from third countries.	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

b. The potential to extract critical raw materials from primary sources in third countries is currently underexploited.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
c. The global processing and refining capacities for critical raw materials are currently insufficient.	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
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.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
e. The extraction of critical raw materials from primary sources in third countries contributes to environmental degradation.	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

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?

	Strongly agree	Agree	Neutral	Disagree	Strongly disagree	I do not know / No opinion
a. Difficulty to access private financing for critical raw materials projects.	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
b. Difficulty to access public funding in third countries for critical raw materials projects.	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
c. Difficulty or undue delay to receive a permit for a critical raw materials project.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
d. Lack of technical standards for processes along the critical raw materials value chain.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
e. Fear of reputational damage for companies.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

f. Lack of or limited public acceptance for new critical raw materials projects in third countries.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
g. Unfair local competition from third countries.	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
h. Price volatility and unpredictability.	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
i. Lack of skilled workforce to design and operate critical raw materials projects.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
j. Lack of available technologies to carry out critical raw materials projects in line with the required environmental standards.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

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.

To what extent do you agree that the following policy statements can help support the EU's global efforts to secure critical raw materials?

	Strongly agree	Agree	Neutral	Disagree	Strongly disagree	I do not know / No opinion
a. The EU should strengthen the ongoing strategic partnerships on critical raw materials and conclude additional ones with resource rich third countries	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

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.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
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.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
d. The EU should diversify its global supply through its free-trade agreements and trade relations.	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
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.	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

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?

	Strongly agree	Agree	Neutral	Disagree	Strongly disagree	I do not know/ no opinion
a. Export taxes.	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
b. Export licencing.	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
c. Export pricing (dual pricing, minimum export prices).	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

d. Denial of VAT tax rebates when exporting.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
e. Restrictions on customs clearance points for exports.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
f. Export monopolies / qualified exporters lists.	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
g. Domestic market obligations.	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
h. Other trade barriers.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

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?

Facilitate visa and work permits for non-EU citizens. Current processes are complex and time consuming.

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:

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

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