

Comments on Road Map Circular Economy Action Plan

Introduction

The CRM Alliance¹ welcomes the European Commission's Communication announcing a New Circular Economy Action Plan. The government plays an important role in promoting sustainability and the aspect of circularity should be an important component in its policies.

Below are a few comments on the relevance of circular economy measures to critical raw materials. They are accompanied by recommendations of actions to take and to avoid as regulator.

Critical Raw Materials and Circular Economy

- Respect for Critical Raw Materials classification

27 substances are identified by the European Commission as having a particularly high value for the European economy, combined with a supply risk and lack of substitutes.

⇒ Circular Economy policies should not undermine the Critical Raw Material policy and not undermine the safe supply of CRMs to the EU Single Market.

- Critical Raw Materials in the Mine-to-Market Value Chain

A rule governing any of the end products could potentially affect the use of a substance.

⇒ Policies should consider their impact to the entire Mine-to-Market value chain so as to avoid any unnecessary disruption of raw materials markets, including undertaking thorough Impact Assessments and evaluating implications on the downstream supply chain before adopting future regulations/restrictions impacting CRMs.

- Safety and performance

Each CRM has unique features for which there are no substitutes with a comparable performance. The use of substitutes can make products less performing and/or less safe.

⇒ Policies should not encourage to produce either less safe or less performing products but should allow markets to choose those substances that perform best.

- Critical Raw Materials enable a Green Economy

A number of substances are enabler for a green economy; silicon used in solar panels; cobalt used in batteries; coaking coal used to produce steel windmills; etc.

⇒ Consistence is needed in Green Policies and the use of a substance should therefore be taken into account. More should be done to favour the primary production of these materials in the EU.

¹ CRM Alliance has been created by industry to advocate the importance of CRMs for the European economy and to promote a strong European CRM policy. It is the representative body of primary producers, traders and associations of CRMs.