

Implementing the EU's Critical Raw Materials Act

SUMMARY

The EU's ability to boost its competitiveness, become a climate-neutral economy by 2050, sustain the green and digital transition and achieve strategic autonomy depends heavily on access to critical raw materials (CRMs). Key technologies, across all industries, depend on CRMs' unique physical properties.

The CRM Act (CRMA), aimed at making the EU's supply of CRMs more secure, resilient and sustainable, entered into force on 23 May 2024. The CRMA lists 34 CRMs, of which 17 are considered 'strategic' (SRMs). The act includes measures to strengthen the EU's raw materials supply chains, monitor and mitigate supply risks and increase the sustainability of the CRMs consumed in the EU. It sets the following non-binding benchmarks for the overall capacity at EU level to be achieved by 2030 (in terms of annual consumption of SRMs): the EU should mine 10 % of its annual needs, process 40 % of its needs, and cover 25 % of its needs through recycling. Furthermore, the EU should diversify its imports of SRMs and, for each SRM, should not depend on any single third country for more than 65 % of its supply by 2030. The CRMA also sets a number of deadlines for key developments up to 2031.

The time has now come to implement the new regulation. The CRMA has generally been hailed as a good first step in the right direction, but its weaknesses have also been highlighted. These include the lack of specific EU funding and doubt as to whether the measures to accelerate mining will prove effective. The EU's capacity to achieve the benchmarks for 2030 has therefore been questioned by a number of experts.

Many proposals for improving the EU's CRM policy have recently been put forward. The Draghi Report includes 11 specific priority actions, including setting up a dedicated EU CRM platform to deliver a more comprehensive and coordinated strategy covering the whole CRM value chain. The Letta Report suggests that the EU could use joint purchasing to set up strategic reserves of key CRMs to the benefit of the single market. Other proposals outlined in this briefing include measures to boost circularity, ensure coherence of EU law affecting the CRM sector, and develop global partnerships to diversify supply.



IN THIS BRIEFING

- Introduction
- Main features of the CRM Act
- Latest developments
- The road ahead: Main issues and debate on possible new policy developments
- Annex – Deadlines set in the CRM Act

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Introduction

A wide range of [key technologies](#) across all industries, from chips to batteries, medical imaging to tanks, rely on the unique physical properties of certain CRMs (defined as 'critical' on the basis of their economic importance and supply risk). The transition to 'net-zero' and the digital age is particularly [materials intensive](#). Although demand for CRMs is expected to skyrocket in the coming years, it remains uncertain whether supply will keep up with the projected needs. CRM supply chains are global, complex, and fragile, which makes them vulnerable to a wide range of risks, including those linked to geopolitical tensions.

The supply of CRMs is often more concentrated than that of fossil fuels. Furthermore, the EU's reliance on imports of CRMs is extremely high, sometimes reaching 100 % (e.g. for rare earth elements – REEs). The EU's strategic dependency in the supply of REEs is a notable example of the challenges linked to the EU's over-dependence on supply chains dominated by third countries.

The [latest outlook](#) released by the International Energy Agency (IEA) in May 2024 points out that mineral demand for clean energy technologies is expected to double between today and 2030 in a scenario reflecting current policy settings. It would almost triple by 2030 and quadruple by 2040 in a net-zero scenario. Furthermore, despite price declines in some CRM markets in 2023 (price falls were due to a strong increase in supply and high levels of stocks of technologies made with CRMs), investments in the CRM mining sector are still growing globally (+10 % in 2023) and the growth in demand for CRMs has remained strong (e.g. +30 % for lithium).

The EU is [highly dependent](#) on imports from China for several CRMs. China has imposed export restrictions on [gallium](#) and [germanium](#) since August 2023, two SRMs for which China is the main EU supplier, which has led to a [near-doubling of gallium prices in Europe](#). Moreover, [germanium prices increased by 52 %](#) between June and August 2024 on suspected stockpiling by China. Export controls on [graphite](#) have also been in place since October 2023, and from mid-September 2024 China has imposed export controls on antimony, a CRM for which it is also the main EU supplier. Antimony prices have hit a record high and doubled compared to last year.

Furthermore, China has [banned the export of rare earth processing technologies](#) since December 2023. In addition, China's [spending on and acquisition of overseas mines](#) reached record levels of \$10 billion in the first half of 2023, with a particular focus on battery metals such as lithium, nickel and cobalt.

The need to secure the supply of CRMs is one of the reasons behind the ['rebirth' of industrial policies](#) globally. Today, nearly all countries (not least China and the United States) have established forms of industrial policy, and the EU has also recently embraced a [more active](#) industrial policy agenda. During the last mandate, EU legislators marked the ['beginning of a new industrial chapter'](#), adopting a number of specific regulatory frameworks supporting the production of strategic technologies ([Net-zero Industry Act](#) – NZIA), setting up a [Strategic Technologies for Europe Platform](#) (STEP) and targeting key industries, such as [batteries](#), semiconductors ([Chips Act](#)) and CRMs ([CRM Act](#)).

Main features of the CRM Act

The CRM Act ([Regulation \(EU\) 2024/1252](#)) entered into force on 23 May 2024. It sets up a framework aimed at ensuring the EU's access to a 'secure, resilient and sustainable supply of CRMs'.

The CRMA lists 34 CRMs, of which 17 are considered 'strategic' ('SRMs'). CRMs are selected based on their economic importance and supply risk, and, among them, SRMs are chosen based on their relevance for the green and digital transition and applications in the defence and aerospace sectors, forecasted growth in demand and difficulty of increasing production; the CRMA includes the methodologies to be used in this process. The Commission can review the list of CRMs and SRMs using delegated acts.

Figure 1 – The 34 CRMs, including 17 SRMs



Note: b.g. stands for battery grade; (*) rare earth elements for magnets (neodymium, praseodymium, terbium, dysprosium, gadolinium, samarium and cerium) are SRMs.

Source: EPRS.

The CRMA sets non-binding benchmarks for the overall capacity at EU level to be achieved by 2030 (in terms of annual consumption of SRMs): the EU should mine 10% of its annual needs; process 40% of its needs; and cover 25% of its needs through recycling. The EU should also diversify its imports of SRMs and, for each SRM, should not depend on any single third country for more than 65% of its supply by 2030.

The Commission should publish EU recycling capacity benchmarks for SRMs in some waste streams (see Annex). By November 2025, it should also publish, for each CRM, indicative projections of their annual consumption in 2030, 2040 and 2050, and indicative benchmarks for extraction and processing for each SRM, with a view to meeting the benchmarks.

The Commission and Member States should encourage technological progress and resource efficiency to moderate the expected increase in EU consumption of CRMs below the reference projection. The Commission will monitor progress towards the benchmarks and towards 'moderat[ing] the expected increase in Union consumption of critical raw materials'.¹ Depending on the monitoring results, the Commission could propose measures to ensure they are achieved. It should also ask the European standardisation organisations to develop standards to support the implementation of the CRMA.

The CRMA sets a number of deadlines up to 2031 (see Annex). For instance, the Commission should publish, by May 2027, a report detailing the EU's progress towards meeting the benchmarks and towards moderating the expected increase in EU consumption.

Strengthening the raw materials supply chain

The Commission is responsible for designating certain raw materials projects as 'strategic projects' through a specific application process. To be designated as strategic, they should contribute to the EU's security of supply of SRMs, be technically feasible, and be implemented sustainably. These projects may be located within the EU or in third countries. Projects in the EU should have cross-border benefits, and those in third countries should add value locally. If a Member State objects to a potential strategic project on its territory, the Commission will not assess its application. Moreover, the Commission cannot approve the application of a project without the explicit approval of the third country concerned.

Member States should designate one authority per relevant administrative level and stage of the CRM value chain as the point of contact for the CRM project promoter. They should facilitate and coordinate the permit-granting process for CRM projects.

Strategic projects should be considered by the permitting authority to be in the public interest. The permitting authority could authorise strategic projects that have an adverse impact on the

environment – falling within the scope of [Directives 2000/60/EC on establishing a framework for Community action in the field of water policy](#), [92/43/EEC on the conservation of natural habitats and of wild fauna and flora](#) or [2009/147/EC on the conservation of wild birds](#), or EU legislative acts regarding the restoration of ecosystems – if it considers that the public interest served by the projects overrides those impacts, and provided all the conditions set out in those legal acts are met.

For strategic processes, the permit-granting process shall not exceed 27 months when they concern extraction activities, and 15 months when they concern processing or recycling activities. Nevertheless, the preparation of the environmental impact assessment report pursuant to [Directive 2011/92/EU on the assessment of the effects of certain public and private projects on the environment](#) is not included in the duration of the permit-granting process. When several assessments of the effects on the environment are required under EU law, they should be bundled through a joint or coordinated procedure, to prevent overlaps and streamline the process.

The authorities responsible should consider including provisions for CRM projects when developing zoning, spatial and land use plans, prioritising priority artificial and built surfaces, industrial and brownfield sites, and active or abandoned mines.

The Commission, together with Member States, should help to facilitate the implementation of strategic projects and improve their access to private investment. The Commission should also establish a system to facilitate the conclusion of offtake agreements related to strategic projects.

Each Member State should develop a national exploration programme targeting CRMs, including measures to acquire and update information on where CRMs occur on their territory.

Monitoring and mitigating supply risks

Figure 2 - Timeline of the adoption of the EU CRMA



Source: EPRS.

The Commission should monitor CRM supply risks, with the support of Member States, by tracking, in particular, trade flows, balances between demand and supply, concentration of supply, price volatility, bottlenecks, and obstacles to trade. A specific monitoring dashboard will be available freely online. The Commission should also carry out a stress test for each SRM at least every 3 years, analysing the vulnerability of the supply chain concerned to disruptions.

Member States should transmit some relevant information (on CRM projects or key companies operating in their territory, along the CRM supply chain, and on major events that may affect the sector) to support the Commission in monitoring the supply risks. Member States should also transmit to the Commission information on their strategic stocks of SRMs (held by all public authorities, publicly owned companies, or economic operators charged with building up strategic stocks on their

behalf) without compromising their defence or national security.

Based on this information, the Commission should adopt a benchmark for a safe level of EU strategic stocks for each SRM. The Commission may also issue opinions addressed to Member States on the increase in the level of strategic stocks and production capabilities, and on possible solutions to make cross-border accessibility of such stocks possible for the production of strategic technologies.

Member States should identify the large companies operating on their territory that use SRMs to produce batteries for energy storage and e-mobility; equipment related to hydrogen production and

utilisation, to renewable energy generation, to data transmission and storage, to additive manufacturing, and to robotics; aircraft; traction motors; heat pumps; mobile electronic devices; drones; rocket launchers; satellites; and advanced chips. These large companies should perform a risk assessment of their SRM supply chain and, if necessary, mitigate the vulnerabilities identified.

The Commission should set up and operate a system to aggregate the demand for some SRMs from EU companies consuming such materials and seek offers from suppliers to match that demand. To limit the impact on competition in the internal market, the Commission should carry out an ex ante impact assessment of the system for each SRM market; EU companies participating in the system could jointly negotiate the purchase of the SRMs concerned. The Commission should build on the lessons learned from the [joint purchasing of gas](#) under Council Regulation (EU) 2022/2576.

Ways to increase the sustainability of CRMs consumed in the EU

Member States should adopt national programmes including measures that promote circularity, such as measures to enhance resource efficiency and moderate the expected increase in EU consumption of CRMs, increase the collection of waste with CRM recovery potential, or promote circular design and substitution of CRMs in products.

Operators of extractive waste facilities should carry out a preliminary economic assessment concerning the recovery of CRMs from extractive waste. To improve information about the CRM potential of closed extractive waste facilities, Member States should publish a database on these facilities present on their territory, including information on the quantities of raw materials present in the waste concerned. Member States should also promote the recovery of CRMs from extractive waste, particularly from closed extractive waste facilities identified in the database and containing potentially economically recoverable CRMs.

Companies selling market magnetic resonance imaging devices, wind energy generators, industrial robots, motor vehicles, light means of transport, cooling generators, heat pumps, electric motors (including where electric motors are integrated in other products), automatic washing machines, tumble driers, microwaves, vacuum cleaners or dishwashers should label these products, indicating whether they contain one or more permanent magnets and, if so, which type of permanent magnet (e.g. neodymium-iron-boron). Information should also be made available on how to access and remove safely the permanent magnets.

By 24 May 2027 or 2 years from the entry into force of the delegated act setting up the methodology to calculate and verify it, any company selling products mentioned above, and for which the total weight of all permanent magnets exceeds 0.2 kg, should publish on a free-access website the share of secondary (i.e. recovered from post-consumer waste) neodymium, dysprosium, praseodymium, terbium, boron, samarium, nickel and cobalt present in the permanent magnets. By 31 December 2031, the Commission should adopt delegated acts establishing mandatory minimum content for secondary neodymium, dysprosium, praseodymium, terbium, boron, samarium, nickel and cobalt that must be present in the permanent magnet incorporated in the products concerned.

The Commission may recognise some certification schemes concerning the sustainability of CRMs developed by governments, industry associations and groupings of interested organisations; the CRMA lays down criteria to be used by the Commission during the application process. These schemes should be open to all economic operators, verification and monitoring of compliance should be based on standards, the verifiers should be competent and independent, and an audit report should be established at the site where the project is located. The requirements for certification should at least include requirements ensuring environmentally sustainable practices, and the Commission should publish online a register listing the recognised schemes.

The Commission should decide which CRMs should be prioritised when it comes to making the declaration of their environmental footprint mandatory. This obligation should only apply if the Commission has concluded, through a specific assessment, that it would contribute to the EU's climate and environmental objectives – by promoting the use of CRMs that have a lower

environmental footprint – and if it would not disproportionately affect trade flows and companies' ability to source CRMs. For these CRMs, the Commission should adopt rules to calculate and verify their environmental footprint, based on scientific methods and international standards on life-cycle assessment. The rules should identify at least the three most important impact categories in terms of environmental footprint, including greenhouse gas emissions. The environmental footprint declaration should be published freely on the internet.

Furthermore, the Commission should develop environmental footprint performance classes for CRMs for which calculation and verification rules exist, through delegated acts.

The CRMA creates a European CRM Board, composed of representatives of all Member States and of the Commission (which also chairs the Board). The Chair should invite representatives of the European Parliament as observers. The Board supports the Commission in the implementation of the CRMA – for example, in its assessment of applications for strategic projects or in the coordination of strategic stocks. The CRM Board has some standing thematic groups, such as on financing or on circularity issues. The Board should also be used by the Member States and the Commission to discuss issues related to strategic partnerships in the area of CRMs.

Latest developments

The [first meeting of the CRM Board](#) took place on 23 May 2024 (on the day the CRMA entered into force). The Commission opened the [call for applications for strategic projects](#) on the same day, and the first cut-off date for the submission of applications was set at 22 August 2024. The Commission received [170 applications](#) – 71 % from within the EU, covering all stages of the value chain – and is expected to take its decision on the applications in the fourth quarter of 2024.

Furthermore, up to 31 May 2024 the Commission carried out a survey on demand aggregation and matchmaking under the CRMA, addressed to businesses and other parties interested in pooling CRM demand and connecting supply and demand for CRMs. The Commission explained that the result of the survey would contribute to the establishment of this new mechanism.

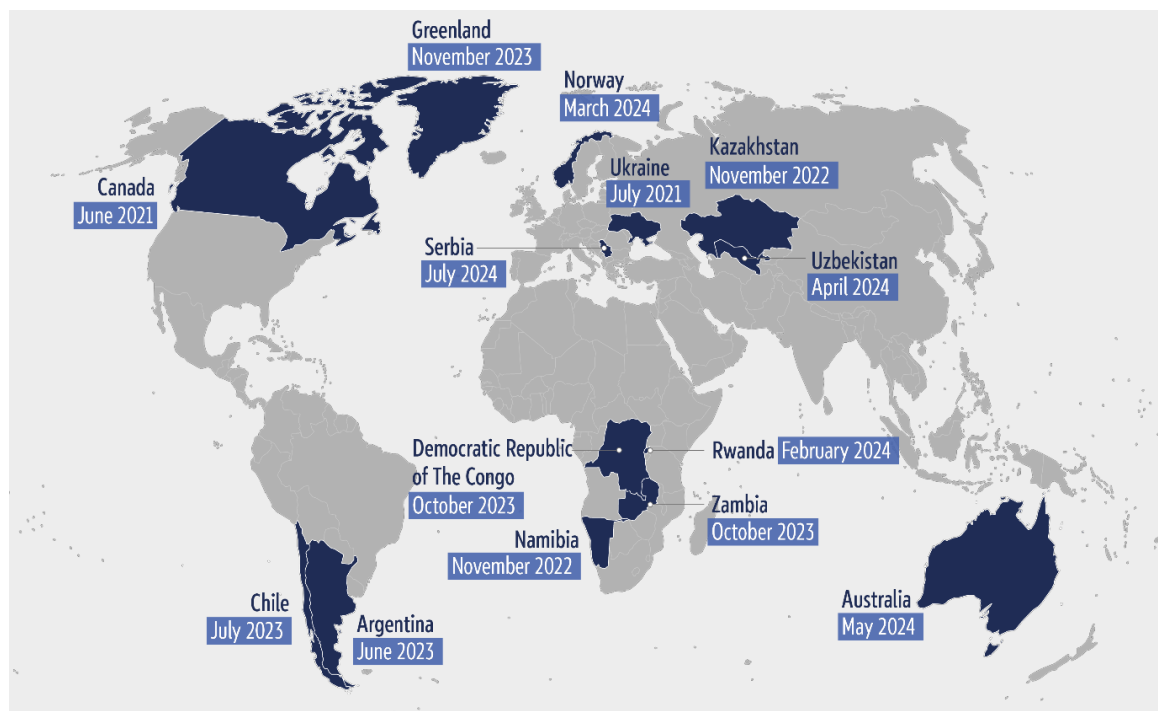
In July 2024, the EU and the European Bank for Reconstruction and Development (EBRD) signed, under the InvestEU umbrella, an agreement on a [new facility to support exploration](#) for CRMs and SRMs, aiming to mobilise around €100 million in investments. The EU is contributing €25 million from Horizon Europe, the EBRD is providing another €25 million, and the joint facility aims to leverage a further €50 million. Some Member States – such as [France](#), [Germany](#) and [Italy](#) – have also set up national funds to boost their supply of CRMs.

Under its raw materials diplomacy aimed at securing access to CRMs through strategic partnerships and policy dialogues, the EU has engaged in strategic partnerships with resource-rich third countries. By July 2024, it had signed [14 such strategic partnerships](#)² on raw materials (see Figure 3 below).

The EU is a member of the [minerals security partnership](#) (MSP), which brings together 15 partners³ to boost public and private investment in critical minerals projects that help to diversify and stabilise global supply chains, promote high environmental, social and governance standards, and increase recycling. It is also part of the [MSP forum](#), launched in April 2024 and which has attracted [23 members](#) since July 2024. Open to countries committing to the MSP principles, it aims to promote cooperation between critical minerals-rich countries and countries with high demand for these minerals. The CRM Club, announced by the Commission in its [2023 communication](#) on a secure and sustainable supply of CRMs in support of the twin transition, is a full part of the MSP Forum.

In September 2024, the first [sustainable investment facilitation agreement](#) (SIFA), between the EU and Angola, entered into force. It aims to facilitate investment for the purposes of economic diversification and sustainable development, in all economic sectors, including CRMs. Angola is thought to have [significant mineral potential](#).

Figure 3 – Strategic partnerships signed by the EU



Source: EPRS, based on [European Commission data](#).

In February 2024, the Commission presented a communication putting forward a number of actions to support the [advanced materials](#) sector in Europe, as some of them could substitute certain CRMs, thus contributing to the objectives of the CRMA.

The road ahead: Main issues and debate on possible new policy developments⁴

The [Letta Report](#) on the future of the single market, published in April 2024, welcomes the CRMA but emphasises the need to further intensify efforts to secure the EU's supply of CRMs. Letta suggests that the EU could use joint purchasing to set up strategic reserves of key CRMs to the benefit of the single market. Moreover, he recommends promoting circular economy principles within the single market – for example, by stimulating demand for high-quality recycled materials and to promote the use of secondary raw materials.

The [Draghi Report](#) released in September 2024 acknowledges that the CRMA is a step in the right direction but emphasises the need for further efforts. Draghi points out that the CRMA must be implemented quickly and fully.

The Draghi Report puts forward 11 proposals as the next steps beyond the CRMA: 1) develop a more comprehensive and coordinated strategy covering the whole value chain, building on the CRMA; 2) set up a dedicated EU CRM platform to deliver on the EU strategy, reinforcing supply chain monitoring and playing a role in joint purchasing of CRMs (it could also manage future EU strategic stockpiles); 3) develop new financing solutions to support projects along the CRM value chain; 4) reinforce CRM resource diplomacy to secure supply and diversification; 5) develop joint strategies with other global buyers in the G7 or OECD; 6) further promote mining in the EU;

The new European Commission and CRMs

CRMs are among the key topics for the next European Commission. In her [political guidelines for 2024-2029](#), Ursula von der Leyen announced a new clean industrial deal for competitive industries and quality jobs in the first 100 days of her mandate, focusing on ensuring access to cheap, sustainable and secure energy supplies and raw materials. She proposed to activate and extend the EU's aggregate demand mechanism to go beyond gas and include CRMs. The Commission is also expected to work on new clean trade and investment partnerships to help secure supply of raw materials. Moreover, she announced a new circular economy act, which will help to create market demand for secondary materials and a single market for waste, notably in relation to CRMs.

Stéphane Séjourné, as mentioned in his [mission letter](#), is the Commissioner-designate entrusted with implementing the CRMA. He will establish an EU CRM platform to support joint purchasing and manage strategic stockpiles of CRMs. He is also asked to present the future circular economy act, and to develop a steel and metals action plan.

7) enhance research and innovation in alternative materials and processes to substitute CRMs where possible, and rely on components and materials that are more abundant or less expensive; 8) establish a true single market for waste and recycling in the EU; 9) speed up the creation of a sustainable EU CRM market (for example, prohibit market access to CRMs below a certain threshold for their environmental footprint); 10) develop strategic stockpiles for some CRMs; and 11) improve CRM market transparency.

In a July 2024 [briefing](#) on a European sovereignty fund prepared for the European Parliament Committee on Economic Affairs (ECON), Daniel Gros, Director of the Institute for European Policymaking at Bocconi University, argues that a new European CRM fund could be set up to invest in the EU's CRM security of supply by acquiring and managing strategic stockpiles of CRMs, which would foster the aims of the CRMA.

A 2024 [study carried out for the European Parliament Panel for the Future of Science and Technology](#) (STOA) by L. Espinoza et al. puts forward a range of possible actions in the area of research and innovation (R&I) to improve the EU's CRM supply. They include strengthening expertise inside the EU institutions to support the implementation of the CRMA (which could take the form of a specific 'office' with its own analytical capabilities) and carrying out research into overcoming regulatory barriers to achieve the CRMA's goals. It further suggests increasing funding allocated to the research topics linked to raw materials in EU framework programmes, and boosting R&I on demand reduction (reduced consumption, substitution and longevity of products). There should also be more funding for R&I aspects of strategic partnerships on raw materials, more research collaboration with non-EU partners, and international projects should help gather data on supply chains, as these remain opaque. In addition, research should help to improve citizen engagement and responsible innovation around new or reactivated exploration, mining and processing sites.

As stressed by Bruegel in its [memos to the EU leadership 2024-2029](#), the effectiveness of the CRMA remains to be tested. The memos recall that, due to the lack of EU-level funding, the main instruments of the CRMA are regulatory (such as shortened permitting times or strengthened circular economy rules).

As recalled by Ditte Brasso Sørensen in an [analysis](#) for ThinkEuropa, the EU's capacity to achieve the CRMA's benchmarks has been questioned by a number of experts, and revitalising mining and processing in Europe presents several challenges. Mining activities face low social acceptance, and high energy and labour costs are affecting the viability of CRM projects. Furthermore, decades of limited research and exploration have left the EU with insufficient information on its mineral reserves, impeding the development of viable projects. The CRMA's efforts to streamline permitting processes may not significantly shorten the lead times needed to realise SRM projects, as they constitute only a small part of the overall preparation time required for such projects. Similarly, the CRMA's objectives of enhancing processing and recycling activities in Europe face considerable challenges.

Diana Gherasim, in a 2024 analysis for [Ifri](#), also points to the risk for the EU of missing the benchmarks due to insufficient funding, low public acceptance of CRM projects, volatile CRM prices, unclear business cases, and ineffective strategic CRM partnerships. The EU should make sure that the strategic projects receive real benefits, including capital (CAPEX) and operational expenditure (OPEX) support (for instance, via tax credits). The supply of abundant low-carbon and competitive energy is key for CRM project holders. In addition, as sustainable mines are more expensive, a common joint financing facility for CRM could be set up and be linked to an EU stockpiling mechanism. The EU should also establish a joint funding scheme to support projects in countries without any national support schemes. Furthermore, she emphasises the importance of bolstering Europe's mid-stream value chain, particularly in the production of cathode and anode materials, to ensure a market for EU-sourced and refined CRMs.

In a [briefing](#) for the Hertie School – Jacques Delors Centre, Arthur Leichthammer stresses that the CRMA, as it stands, is insufficient. For him, the CRMA is likely to fall short of its ambitions for two reasons: first, the acceleration of permitting processes alone is unlikely to increase significantly the speed of mining investments. Second, the CRMA lacks the financial power of comparable programmes. As CRM projects are particularly risky, without greater financial support companies are likely to continue being reluctant to make the required investments. Without additional public financial support in the form of equity and investment guarantee support, it is unlikely to channel greater financial resources to CRM projects. Furthermore, the new Commission needs to set specific strategic priorities for individual CRMs (deciding, for example, whether they should be domestically sourced or sourced through international partnerships, and on which part of the value chain the EU should focus). The EU should also promote the use of resilience criteria in public procurement.

[Eurometaux](#) estimates that the EU needs to open at least 10 new mines, 15 new processing facilities and 15 recycling facilities for key SRMs by 2030 (while no mine has opened in the past 15 years in the EU), and to finance 15 CRM-related projects in third countries through the [Global Gateway](#); 10 000 new workers should also be trained (such as geologists, metallurgists and engineers). In addition, Eurometaux recommends creating a sovereignty fund for manufacturing, with a strong raw materials focus; setting up a raw materials bank inspired by the [hydrogen bank](#); and introducing a new package of State aid guidelines focused on CAPEX and OPEX.

[Euromines](#) says that 20-30 new strategic mine projects are needed in Europe to deliver on the CRMA's 10% benchmark, and that 'Europe has to take a closer look at the wider framework governing mining activities beyond the Critical Raw Materials Act'. The Commission should also enlarge the [EU taxonomy](#) to include mining, and reform State aid provisions to unlock investment.

[Transport and Environment](#) (T&E) stress that mining waste rules in Europe are outdated and, in some areas, weaker than those of countries such as Brazil and China. It points to a significant risk of fragmentation in implementing the [Directive on the management of waste from extractive industries](#) (Directive 2006/21/EC), with many key provisions not clarified and left to the discretion of the Member States. T&E called on the new Commission to update this Directive – for example, to ensure community participation from the outset and throughout a project.

The Institute for European Environmental Policy ([IEEP](#)) insists on the need to ensure policy coherence between the CRMA, the [eco-design](#), [batteries](#) and [waste shipment](#) regulations, and the [Waste Framework Directive](#) to improve circularity in the CRM value chain.

MAIN REFERENCES

G. Ragonnaud, [Securing Europe's supply of critical raw materials: The material nature of the EU's strategic goals](#), EPRS, European Parliament, 2023.

International Energy Agency, [Global Critical Minerals Outlook 2024](#), 2024.

ENDNOTES

- ¹ Article 5(2) of the CRMA.
- ² CRM country profiles can be found in the [Joint Research Centre's Raw Materials Information System](#).
- ³ Australia, Canada, Estonia, Finland, France, Germany, India, Italy, Japan, Norway, the Republic of Korea, Sweden, the United Kingdom, the United States and the EU.
- ⁴ This section aims to provide a flavour of the debate and is not intended to be an exhaustive account of all different views on the topic.

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Annex – Deadlines set in the CRM Act

Date/deadlines	Item
2024	
3 May 2024	Publication of the CRM Act in the Official Journal of the EU
23 May 2024	Entry into force of the CRM Act
24 August 2024	First cut-off date of the open call for applications for recognition of CRM projects as strategic projects
24 November 2024	Commission to adopt an implementing act establishing a single template for the applications for recognition of CRM projects as strategic projects
2025	
24 February 2025	Permit-granting process: Member States to establish or designate one or more authorities as 'single points of contact'
24 May 2025	Member States to draw up national programmes for general exploration targeted at CRMs and carrier minerals of CRMs
24 May 2025 and within 12 months of each update of the list of SRMs	Member States to identify the large companies operating on their territory using SRMs to produce batteries; equipment related to hydrogen production and utilisation, renewable energy generation, data transmission and storage, additive manufacturing, and robotics; aircraft; traction motors; heat pumps; mobile electronic devices; drones; rocket launchers; satellites; and advanced chips
24 May 2025	National measures on circularity: Commission to adopt implementing acts listing products, components and waste streams with a relevant CRM recovery potential
24 May 2025	Commission to publish a report on the consistency of the CRM Act with other EU law
24 November 2025	Each Member State to create a database of the closed extractive waste facilities located on their territory, including those that have been abandoned
24 November 2025	(Database) Member States to review the available permitting files, or other available documentation when these files do not exist, for closed extractive waste facilities
24 November 2025	Permanent magnet content: Commission to adopt an implementing act establishing the format for the labelling of some products listed in the CRM Act
24 November 2025	Commission to submit a report to the European Parliament and the Council setting out which CRMs are to be prioritised for assessing the necessity and proportionality of declaring their environmental footprint Commission to present the conclusions of the assessment of necessity and proportionality for the CRMs identified as a priority within 12 months of the report being submitted
24 November 2025	Commission to submit a report including indicative projections of the annual consumption of each CRM in 2030, 2040 and 2050, including a low, a high and a reference projection, as well as indicative benchmarks for extraction and processing per SRM, with a view to meeting the benchmarks for 2030
24 November 2025	Member States to lay down rules on penalties applicable to infringements of the CRM Act and take all measures necessary to ensure that they are implemented

Date/deadlines	Item
2026	
24 May 2026	Commission to submit a report to the CRM Board describing obstacles to accessing finance for strategic projects and including recommendations to facilitate such access
24 May 2026	Commission to share with the CRM Board a draft benchmark on a safe level of EU strategic stocks for each SRM; a comparison of the overall level of EU strategic stocks for each SRM and the draft benchmark; and information on the potential cross-border accessibility of strategic stocks
24 May 2026	(Database) Member States to conduct representative geochemical sampling for extractive waste facilities where available information could indicate the presence of potentially economically recoverable quantities of CRMs
24 May 2026 and annually thereafter	Member States to submit a report to the Commission containing information on: progress in the implementation of the measures included in their national exploration programmes; new or existing CRM projects on their territory; key market operators along the CRM value chain established on their territory; information on the state of their strategic stocks of SRMs; whether they intend to implement the Commission opinion on strategic stocks; information on the national measures on circularity
24 May 2026	The Commission to adopt a delegated act establishing rules for the calculation and verification of the share of neodymium, dysprosium, praseodymium, terbium, boron, samarium, nickel and cobalt recovered from post-consumer waste present in the permanent magnets incorporated in a range of products
24 November 2026	Operators of extractive waste facilities to submit to the competent authority a preliminary economic assessment study regarding the potential recovery of CRMs from the extractive waste stored in the facility, and from the extractive waste being generated, or from the extracted volume prior to it becoming waste
2027	
1 January 2027	The Commission to adopt delegated acts providing for EU recycling capacity benchmarks expressed as a share of the SRMs available in relevant waste streams
24 March 2027	(Database) Member States to carry out a more detailed sampling with chemical and mineralogical characterisation for extractive waste facilities with potentially economically recoverable quantities of CRMs, where this is environmentally sound
24 May 2027 and every 3 years thereafter	The Commission reviews and, if necessary, updates the list of SRMs
24 May 2027 and at least every 3 years thereafter	The Commission reviews and, if necessary, updates the list of CRMs
24 May 2027 or 2 years from the entry into force of the delegated act	Any natural or legal person that places on the market any products listed in the CRM Act which incorporate one or more permanent magnets and for which the total weight of all such permanent magnets exceeds 0.2 kg to make publicly available on a free-access website the share of neodymium, dysprosium, praseodymium, terbium, boron, samarium, nickel and cobalt recovered from post-consumer waste present in the permanent magnets incorporated in the product
24 May 2027 and at least every 3 years thereafter	Commission to monitor progress towards the benchmarks, and towards moderating the expected increase in EU consumption of CRMs, and to publish a report detailing the EU's progress towards meeting those benchmarks and towards moderating the expected increase in EU consumption

Date/deadlines	Item
24 May 2027	Commission to adopt implementing acts on a single template to be used by the owners of certification schemes related to the sustainability of CRMs, which will provide the minimum information required for applications for recognition by the Commission
24 May 2027	(Database) Member States to introduce all the information required in the database of the closed extractive waste facilities located on their territory
24 November 2027	(Database) Member States to adopt and implement measures to promote the recovery of CRMs from extractive waste, particularly from closed extractive waste facilities identified in the database containing potentially economically recoverable CRMs
2029	
24 May 2029	Date of application of Articles 40 and 41
24 May 2029	Commission to carry out an evaluation of the CRM Act in light of its objectives and present a report to the European Parliament, the Council, and the European Economic and Social Committee
24 May 2029	Article 28 to apply to magnetic resonance imaging devices, motor vehicles and light means of transport that are type-approved vehicles of category L
2031	
31 December 2031	Commission to adopt delegated acts laying down minimum shares for neodymium, dysprosium, praseodymium, terbium, boron, samarium, nickel and cobalt recovered from post-consumer waste that must be present in the permanent magnet incorporated in the products listed in the CRM Act

Source: EPRS.