



**2025/0385(COD)**

17.3.2026

**\*\*\*I**

## **DRAFT REPORT**

on the proposal for a regulation of the European Parliament and of the Council  
amending regulation (EU) 2024/1252  
(COM(2025)0946 – C10-0324/2025 – 2025/0385(COD))

Committee on Industry, Research and Energy

Rapporteur: Mohammed Chahim

### ***Symbols for procedures***

- \* Consultation procedure
- \*\*\* Consent procedure
- \*\*\*I Ordinary legislative procedure (first reading)
- \*\*\*II Ordinary legislative procedure (second reading)
- \*\*\*III Ordinary legislative procedure (third reading)

(The type of procedure depends on the legal basis proposed by the draft act.)

### ***Amendments to a draft act***

#### **Amendments by Parliament set out in two columns**

Deletions are indicated in ***bold italics*** in the left-hand column. Replacements are indicated in ***bold italics*** in both columns. New text is indicated in ***bold italics*** in the right-hand column.

The first and second lines of the header of each amendment identify the relevant part of the draft act under consideration. If an amendment pertains to an existing act that the draft act is seeking to amend, the amendment heading includes a third line identifying the existing act and a fourth line identifying the provision in that act that Parliament wishes to amend.

#### **Amendments by Parliament in the form of a consolidated text**

New text is highlighted in ***bold italics***. Deletions are indicated using either the **■** symbol or ~~strikeout~~. Replacements are indicated by highlighting the new text in ***bold italics*** and by deleting or striking out the text that has been replaced.

By way of exception, purely technical changes made by the drafting departments in preparing the final text are not highlighted.

## CONTENTS

	<b>Page</b>
DRAFT EUROPEAN PARLIAMENT LEGISLATIVE RESOLUTION .....	5
EXPLANATORY STATEMENT .....	19
ANNEX: DECLARATION OF INPUT .....	21



## DRAFT EUROPEAN PARLIAMENT LEGISLATIVE RESOLUTION

**on the proposal for a regulation of the European Parliament and of the Council amending regulation (EU) 2024/1252 (COM(2025)0946 – C10-0324/2025 – 2025/0385(COD))**

**(Ordinary legislative procedure: first reading)**

*The European Parliament,*

- having regard to the Commission proposal to Parliament and the Council (COM(2025)0946),
  - having regard to Article 294(2) and Article 114 of the Treaty on the Functioning of the European Union, pursuant to which the Commission submitted the proposal to Parliament (C10-0324/2025),
  - having regard to Article 294(3) of the Treaty on the Functioning of the European Union,
  - having regard to the opinion of the European Economic and Social Committee of 18 February 2026<sup>1</sup>,
  - having regard to Rule 60 of its Rules of Procedure,
  - having regard to the opinions of the Committee on Development and the Committee on the Environment, Climate and Food Safety,
  - having regard to the report of the Committee on Industry, Research and Energy (A10-0000/2026),
1. Adopts its position at first reading hereinafter set out;
  2. Calls on the Commission to refer the matter to Parliament again if it replaces, substantially amends or intends to substantially amend its proposal;
  3. Instructs its President to forward its position to the Council, the Commission and the national parliaments.

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<sup>1</sup> Not yet published in the Official Journal.

## Amendment 1

### Proposal for a regulation

#### Recital 3

*Text proposed by the Commission*

(3) Under Regulation (EU) 2024/1252, the Commission is required to set up calls for application for Strategic Projects **with at least four** cut-off dates per year. **Given the high number of applications for recognition of Strategic Project under each call per call received for the identification of Strategic projects of strategic critical raw material projects and to ensure a better assessment of the various applications, it should be possible for the Commission to limit the number of such calls per year.**

*Amendment*

(3) Under Regulation (EU) 2024/1252, the Commission is required to set up calls for application for Strategic Projects. **In order to ensure predictability for applicants while maintaining sufficient administrative flexibility, the Commission should set cut-off dates for such calls at least twice per year. Establishing a minimum frequency of calls ensures regular opportunities for project promoters to submit applications and to respond to evolving programme needs, increased demand for project recognition, and timely assessment of applications.**

**In addition, the Commission could be able to organise additional targeted calls, where appropriate. Such calls should take into account the whole value-chain approach that links different stages of the value chain, including extraction, processing, refining, manufacturing, recycling and downstream demand.**

Or. en

## Amendment 2

### Proposal for a regulation

#### Recital 4

*Text proposed by the Commission*

(4) Under Regulation (EU) 2024/1252, Member States are required to identify large companies by May 2025 and within 12 months of each update of the list of strategic raw materials pursuant to Article 3(3). Nevertheless, large companies that use **critical** raw materials can operate in more than one Member State. To avoid a duplication of the identification of these

*Amendment*

(4) Under Regulation (EU) 2024/1252, Member States are required to identify large companies by May 2025 and within 12 months of each update of the list of strategic raw materials pursuant to Article 3(3). Nevertheless, large companies that use **strategic** raw materials can operate in more than one Member State. To avoid a duplication of the identification of these

large companies by the various national administrations and to prevent a risk of fragmentation of the Single Market, it should be for the Commission to identify these large companies operating in the Union.

large companies by the various national administrations and to prevent a risk of fragmentation of the Single Market, it should be for the Commission to identify these large companies operating in the Union.

Or. en

### Amendment 3

#### Proposal for a regulation

##### Recital 5

###### *Text proposed by the Commission*

(5) It is essential to strengthen the risk preparedness of the large companies that are identified by the Commission, it is essential that their obligations are strengthened, and therefore large companies should be required to take measures to mitigate their vulnerabilities, including **by** diversifying their raw material supply chain. The Commission should be able to receive the information regarding their compliance necessary for an effective monitoring and ensure they are prepared in case of supply disruption. The Commission should specify the mitigation measures that large companies should adopt in case of vulnerabilities, it should be able to do so by means of delegated acts.

###### *Amendment*

(5) It is essential to strengthen the risk preparedness of the large companies that are identified by the Commission, it is essential that their obligations are strengthened, and therefore large companies should be required to take measures to mitigate their vulnerabilities including ***reducing the use of strategic raw material, by improving material efficiency***, diversifying their ***strategic*** raw material supply chain, ***considering secondary raw materials, or to substituting the strategic raw material or by replenishing of stocks of strategic raw materials, including, where appropriate, through the joint purchasing mechanism referred to in Regulation (EU) 2024/1252***; the Commission should be able to receive the information regarding their compliance necessary for an effective monitoring and ensure they are prepared in case of supply disruption. The Commission should specify the mitigation measures that large companies should adopt in case of vulnerabilities, it should be able to do so by means of delegated acts. ***The Commission could issue guidance and appropriate tools for how companies should fulfil reporting obligations, in consultation with Member States and stakeholders, to facilitate compliance in a practical manner.***

## Amendment 4

### Proposal for a regulation

#### Recital 8

*Text proposed by the Commission*

(8) The recognition of *pre-consumer* recycled materials complements, the recovery of post-consumer waste by ensuring that manufacturers can improve short-term resource efficiency while maintaining strong incentives to build and expand end-of-life collection and recycling systems. *Additional product categories and pre-consumer waste are therefore essential to improve recycling, strengthen traceability and increase the availability of secondary materials thereby supporting the Union's overall resource efficiency and security of supply.*

*Amendment*

(8) *The increased use of recovered raw materials would support the development of the circular economy and allow for a more resource-efficient use of raw materials from permanent magnets, while reducing the Union's dependency on raw materials from third countries. Therefore, including manufacturing waste could help establish a European recycling industry in the short term.* The recognition of *manufacturing waste* recycled materials complements, the recovery of post-consumer waste by ensuring that manufacturers can improve short-term resource efficiency while maintaining strong incentives to build and expand end-of-life collection and recycling system. *However, reutilisation of materials, such as rework, regrind or scrap generated in the permanent magnet manufacturing process, which can be reclaimed within the same process that generated the material, do not constitute waste and should therefore not be seen as part of the recycled content shares of permanent magnets under Regulation (EU) 2024/1252. Target trajectories for each raw material should fully consider the actual recycling potential for manufacturing and post-consumer waste, taking into account Union-originated waste to ensure ambitions are technically achievable and drive genuine investment in post-consumer waste. Future increases in recycled content targets should be reflected in the increase of post-consumer waste shares rather than raising manufacturing waste shares.*

## Amendment 5

### Proposal for a regulation Recital 8 a (new)

*Text proposed by the Commission*

*Amendment*

***(8a) The Union faces a potential shortage of rare earth elements, which are critical for the production of permanent magnets and essential for strategic industries. Ensuring that recyclable materials remain within the Union will enhance industrial resilience and reinforce the security and reliability of the Union's supply chains. In this context, the Commission could by way of a thorough assessment that takes due account of its international obligations and partnerships with third countries, propose restrictions on the export of scraps and waste of permanent magnets from the Union. Such export restrictions should be used judiciously and targeted to specific material streams. By leveraging trade data, the Commission could identify the streams where secondary material losses are most significant, ensuring that any restrictions are proportionate and effective.***

Or. en

## Amendment 6

### Proposal for a regulation Recital 8 b (new)

*Text proposed by the Commission*

*Amendment*

***(8b) In order to accelerate investment in extraction, processing and recycling capacities for critical raw materials within the Union, it is necessary to address significant market risks, including price volatility and lengthy project investment cycles associated with such projects.***

*Price-stabilisation mechanisms, including financial hedging mechanisms such as Contracts for Difference could provide greater revenue certainty for project developers, while ensuring that public support remains proportionate and responsive to market conditions. Member States and the Commission should explore the use of such instruments to support Strategic Projects under Regulation (EU) 2024/1252, including in relation to Important Projects of Common European Interest (IPCEI) projects in accordance with Union's State Aid rules.*

Or. en

## **Amendment 7**

### **Proposal for a regulation Recital 8 c (new)**

*Text proposed by the Commission*

*Amendment*

*(8c) Strategic raw materials are often subject to concentrated supply chains and geopolitical risks that may lead to sudden supply disruptions. In order to strengthen the Union's preparedness and resilience, improved coordination among Member States regarding strategic stocks of such materials is necessary. The joint purchasing mechanism established under Regulation (EU) 2024/1252 could, where appropriate, facilitate the coordinated establishment or replenishment of strategic stocks by participating undertakings and Member States.*

Or. en

## **Amendment 8**

### **Proposal for a regulation Recital 8 d (new)**

*Text proposed by the Commission*

*Amendment*

***(8d) Whereas promoting material efficiency, circularity, and technology diversification can mitigate supply risks, enhance strategic autonomy, and support a sustainable industrial ecosystem, it is appropriate to facilitate the development and deployment of technologies, manufacturing processes, and promote product designs that minimise the use of critical raw materials, foster substitution and recycling under the current and future competitiveness policy frameworks and funds.***

Or. en

## **Amendment 9**

### **Proposal for a regulation Recital 8 e (new)**

*Text proposed by the Commission*

*Amendment*

***(8e) National and European research and innovation programmes play a key role in strengthening the Union's resilience in the supply of critical and strategic raw materials. European research and innovation programmes and dedicated funding instruments could support efforts to diversify the supply of such materials and to develop innovative solutions across their value chains. Particular attention should be given to the development of circular business models, substitution and material efficiency, with the objective of reducing the overall demand for critical and strategic raw materials in strategic technologies.***

Or. en

## **Amendment 10**

### **Proposal for a regulation Recital 8 f (new)**

*Text proposed by the Commission*

*Amendment*

***(8f) Achieving higher recycling rates requires significantly improving the identification, separate collection and treatment of products, components and waste streams containing critical raw materials. The evaluation of Regulation (EU) 2024/1252 in 2028 should therefore assess whether additional Union measures are necessary to ensure the effective recovery of critical raw materials, in particular the necessity of the binding nature of the benchmarks currently sets out in Regulation (EU) 2024/1252. Moreover, a substantial share of such materials is currently lost due to insufficient collection. In particular, the Commission should, as part of the evaluation of further measures to increase the collection, sorting and processing of waste referred to in Regulation (EU) 2024/1252, assess the necessity and feasibility of establishing Union-level waste collection targets for products, components or waste streams containing critical raw materials.***

Or. en

## **Amendment 11**

### **Proposal for a regulation Recital 8 g (new)**

*Text proposed by the Commission*

*Amendment*

***(8g) Strengthening the resilience of the Union's critical raw materials value chains is essential for both economic security and the Union's security and defence capabilities. Defence-related demand can unlock investments in strategic projects across the critical raw materials value chain and act as a catalyst generating positive spillovers for dual-use technologies and industrial ecosystems. The Union should therefore leverage***

*relevant financial instruments and programmes such as the forthcoming European Defence Industry Programme to de-risk and accelerate Strategic Projects.*

Or. en

## Amendment 12

### Proposal for a regulation

#### Article 1 – paragraph 1 – point -1 (new)

Regulation (EU) 2024/1252

Article 2 – paragraph – point 32 a (new)

*Text proposed by the Commission*

*Amendment*

*(-1) in Article 2, the following point is inserted:*

*(32a) ‘manufacturing waste’ means the materials or objects rejected during the manufacturing process such as regrind material or scrap, which cannot be re-used as an integral part in the same process and need to be recycled;*

Or. en

## Amendment 13

### Proposal for a regulation

#### Article 1 – paragraph 1 – point 1

Regulation (EU) 2024/1252

Article 7 – paragraph 3 – subparagraph 2

*Text proposed by the Commission*

*Amendment*

The first such cut-off date shall be no later than 24 August 2024. The Commission shall set cut-off dates *up to four* times per year.;

The first such cut-off date shall be no later than 24 August 2024. The Commission shall set cut-off dates *at least two* times per year.

*The Commission may also open additional calls for applications for targeted projects, which shall take into account the whole value-chain approach and their contribution to programme objectives, where appropriate;*

Or. en

## Amendment 14

### Proposal for a regulation

#### Article 1 – paragraph 1 – point 2 – point d

Regulation (EU) 2024/1252

Article 24 – paragraph 4

#### *Text proposed by the Commission*

4. If significant vulnerabilities to supply disruptions are detected as a result of the risk assessment referred to in paragraph 2, large companies as referred to under paragraph 1 shall take efforts to mitigate those vulnerabilities, including **by** diversifying its raw materials supply chains, considering secondary raw materials, or substituting the strategic raw materials.;

#### *Amendment*

4. If significant vulnerabilities to supply disruptions are detected as a result of the risk assessment referred to in paragraph 2, large companies as referred to under paragraph 1 shall take efforts to mitigate those vulnerabilities including ***reducing the use of strategic raw materials, by improving material efficiency***, diversifying its ***strategic*** raw materials supply chains, considering secondary raw materials, or substituting the strategic raw materials ***or by replenishing of stocks of strategic raw materials, including, where appropriate, through the joint purchasing mechanism referred to in Regulation (EU) 2024/1252;***

Or. en

## Amendment 15

### Proposal for a regulation

#### Article 1 – paragraph 1 – point 2 – point f

Regulation (EU) 2024/1252

Article 24 – paragraph 5a

#### *Text proposed by the Commission*

5a. The Commission may request large companies referred to in paragraph 1 to explain how they comply with the obligations set out in this Article. They shall provide that information no later than 30 days after receiving the request from the Commission.'

#### *Amendment*

5a. The Commission may request large companies referred to in paragraph 1 to explain how they comply with the obligations set out in this Article. They shall provide that information no later than 30 days after receiving the request from the Commission. ***The Commission may support companies with guidance, training, and appropriate tools to facilitate compliance.***

## Amendment 16

### Proposal for a regulation

#### Article 1 – paragraph 1 – point 2 – point f

Regulation (EU) 2024/1252

Article 24 – paragraph 5b – subparagraph 2

#### *Text proposed by the Commission*

The Commission shall base such risk mitigation measures on an assessment of the available information on supply risks, the trade flows between the Union and third countries, and the potential obstacles to trade in critical raw materials and shall specify the maximum shares of reliance on a single third country in the supply chain of critical raw materials.;

#### *Amendment*

The Commission shall base such risk mitigation measures on an assessment of the available information on supply risks, ***demand and supply, price volatility***, the trade flows ***and strategic partnerships*** between the Union and third countries, ***including measuring their contribution to the Union's security of supply***, and the potential obstacles to trade in critical raw materials and shall specify the maximum shares of reliance on a single third country in the supply chain of critical raw materials.;

Or. en

## Amendment 17

### Proposal for a regulation

#### Article 1 – paragraph 1 – point 3

Regulation (EU) 2024/12

Article 28 – paragraph 1 – introductory part

#### *Text proposed by the Commission*

1. From two years after the date of entry into force of the implementing act referred to in paragraph 2, any natural or legal person that places on the 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

#### *Amendment*

1. From two years after the date of entry into force of the implementing act referred to in paragraph 2, any natural or legal person that places on the 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, dishwashers, hard disk drives, transducers, loudspeakers, drones for civil use or motorised toys shall ensure that those products bear a conspicuous, clearly legible and indelible label indicating;

cleaners, dishwashers, hard disk drives, transducers, loudspeakers, drones for civil use or motorised toys **or any other relevant product which contains permanent magnets** shall ensure that those products bear a conspicuous, clearly legible and indelible label indicating;

Or. en

## Amendment 18

### Proposal for a regulation

#### Article 1 – paragraph 1 – point 4 – point a

Regulation (EU) 2024/1252

Article 29 – paragraph 1

#### *Text proposed by the Commission*

1. By 24 May 2027 or two years from the entry into force of the delegated act referred to in paragraph 2, whichever is later, any natural or legal person that places on the market products referred to in Article 28(1) which incorporate one or more permanent magnets referred to in Article 28(1), point (b)(i), (ii) and (iii), and for which the total weight of all such permanent magnets exceeds 0,2 kg shall make publicly available on a free-access website the share of neodymium, dysprosium, praseodymium, terbium, boron, samarium, nickel and cobalt recovered from **pre-consumer** and post-consumer waste, including the shares of such waste produced within the Union, present in the permanent magnets incorporated in the product.;

#### *Amendment*

1. By 24 May 2027 or two years from the entry into force of the delegated act referred to in paragraph 2, whichever is later, any natural or legal person that places on the market products referred to in Article 28(1) which incorporate one or more permanent magnets referred to in Article 28(1), point (b)(i), (ii) and (iii), and for which the total weight of all such permanent magnets exceeds 0,2 kg shall make publicly available on a free-access website the share of neodymium, dysprosium, praseodymium, terbium, boron, samarium, nickel and cobalt recovered from **manufacturing** and post-consumer waste, including the shares of such waste produced within the Union, present in the permanent magnets incorporated in the product.;

Or. en

## Amendment 19

### Proposal for a regulation

#### Article 1 – paragraph 1 – point 4 – point b

Regulation (EU) 2024/1252

Article 29 – paragraph 2

*Text proposed by the Commission*

2. The Commission shall adopt a delegated act in accordance with Article 38 to supplement this Regulation by establishing rules for the calculation and verification of the share of neodymium, dysprosium, praseodymium, terbium, boron, samarium, nickel and cobalt recovered from *pre-consumer* and post-consumer waste, including the shares of such waste produced within the Union, present in the permanent magnets incorporated in the products referred to in paragraph 1 of this Article.;

*Amendment*

2. ***By three months from the date of entry into force of Regulation .../... (procedure 2025/0385 COD)***, the Commission shall adopt a delegated act in accordance with Article 38 to supplement this Regulation by establishing rules for the calculation and verification of the share of neodymium, dysprosium, praseodymium, terbium, boron, samarium, nickel and cobalt recovered from ***manufacturing*** and post-consumer waste, including the shares of such waste produced within the Union, present in the permanent magnets incorporated in the products referred to in paragraph 1 of this Article. ***Based on the public available information published under paragraph 1 of this Article, the Commission shall propose a trajectory for the shares of manufacturing and post-consumer waste, as well as Union-originated waste targets for each strategic raw material.***;

Or. en

**Amendment 20**

**Proposal for a regulation**

**Article 1 – paragraph 1 – point 4 – point c**

Regulation (EU) 2024/1252

Article 29 – paragraph 3

*Text proposed by the Commission*

3. After the entry into force of the delegated act adopted pursuant to paragraph 2, and in any event by 31 December 2031, the Commission shall adopt delegated acts supplementing this Regulation by laying down minimum shares for neodymium, dysprosium, praseodymium, terbium, boron, samarium, nickel and cobalt recovered from, *pre-consumer* and post-consumer waste, including the shares of such waste produced within the Union, or any

*Amendment*

3. After the entry into force of the delegated act adopted pursuant to paragraph 2, and in any event by 31 December 2031, the Commission shall adopt delegated acts supplementing this Regulation by laying down minimum shares for neodymium, dysprosium, praseodymium, terbium, boron, samarium, nickel and cobalt recovered from, ***manufacturing*** and post-consumer waste, including the shares of such waste produced within the Union, or any

combination thereof that must be present in the permanent magnet incorporated in the products referred to in paragraph 1.;

combination thereof that must be present in the permanent magnet incorporated in the products referred to in paragraph 1.;

Or. en

## Amendment 21

### Proposal for a regulation

#### Article 1 – paragraph 1 – point 4 – point d

Regulation (EU) 2024/1252

Article 29 – paragraph 3 – subparagraph 3 – point a

#### *Text proposed by the Commission*

(a) The existing and forecasted availability of neodymium, dysprosium, praseodymium, terbium, boron, samarium, nickel and cobalt recovered from *pre-consumer* and post-consumer waste sources as well as Union recycling capacity;;

#### *Amendment*

(a) The existing and forecasted availability of neodymium, dysprosium, praseodymium, terbium, boron, samarium, nickel and cobalt recovered from *manufacturing* and post-consumer waste sources as well as Union recycling capacity, *with the aim of fostering investments in post-consumer waste*;

Or. en

## EXPLANATORY STATEMENT

The Commission's targeted amendments to the Critical Raw Materials Act (CRMA) reflect the need to strengthen the Union's strategic autonomy, enhance the resilience of critical raw materials (CRMs) supply chains, and foster the development of a circular and sustainable European industrial base. The Commission identified challenges in ensuring the availability of strategic raw materials, particularly rare earth permanent magnets essential for clean tech and proposed clarifications and targeted measures to improve the implementation of recycling and reporting. The ongoing implementation of the CRMA also underlines a risk of fragmentation of the Single Market, arising from disparate identification by individual Member States of the large companies required to perform risk assessments of their supply chains under Article 24. The Commission is therefore mandated to monitor and ensure effective implementation.

The recent report of the European Court of Auditors (ECA) highlighted that the EU faces vulnerabilities in critical raw materials supply, gaps in the collection and recycling of post-consumer waste, and the lack of dedicated funding. In particular, the ECA stressed the need for improved risk preparedness, transparency in recycled content, and a strategic approach to partnerships with third countries. These findings underline the importance of coherent Union-level action to strengthen resilience, ensure predictable access to CRMs, and support investment in industrial ecosystems. The Rapporteur was guided by the findings of the ECA in shaping the proposals contained in this report, shaping measures to improve transparency, risk mitigation, and strategic investment within the CRMA framework.

At the core of the amended CRMA framework is the principle that predictable implementation and the whole value-chain integration are essential for mobilising investment and industrial capacity across the Union. The Rapporteur therefore supports maintaining a minimum of two cut-off dates per year for programme calls, ensuring regular, predictable opportunities for project promoters, while preserving flexibility for the Commission to organise additional targeted calls where operational needs arise. Beyond frequency, targeted calls should encourage projects that integrate across the entire value chain — from extraction and processing to refining, manufacturing, recycling, and downstream demand — strengthening industrial ecosystems, avoiding fragmentation, and anchoring investment in resilient, commercially viable supply chains. In parallel, where supply disruptions create material vulnerabilities, companies should be equipped to mitigate risks through measures they deem appropriate. Options the Rapporteur considers include strategic stock replenishment, improved material efficiency, diversification of sources, substitution, and recycling. Joint purchasing mechanisms can contribute to stockpiling to enhance predictability and transparency, particularly for smaller market actors.

The Rapporteur considers that a resilient and future-proof CRMA must rest on clear definitions and a robust framework that supports both industrial deployment today and the circular economy of tomorrow. For this reason, the amendments clarify what constitutes manufacturing and post-consumer waste, to ensure legal certainty across Union law and avoid ambiguity in recycled content reporting. In the short term, recognising materials recovered from manufacturing waste can help establish a European recycling industry and improve resource efficiency, while internal process materials that remain within the manufacturing stream should not be counted toward recycled content shares because they do not constitute waste. The Rapporteur supports the Commission proposal to include Union-originated waste

shares in the scope of the CRMA to foster European's recycling capacity.

Strategic investment, innovation, and industrial preparedness are also central to the Rapporteur's vision for the CRMA. Recognising that the market risks associated with CRM projects — including price volatility and long development cycles — can deter private capital, the amended text underlines Contracts for Difference (CfDs) as a tool to provide revenue certainty for strategic extraction, processing, and recycling projects. The Rapporteur notes that boosting Europe's refining capacity is primarily an economic challenge, not a technological one, and CfDs can help overcome market barriers that hinder investment. At the same time, policies that promote technologies and processes to reduce dependence on constrained materials — through substitution, material efficiency, and recycling — will enhance competitiveness and sustainability across EU industry. Consistent with the ECA's call for a strategic approach to partnerships, the Commission should regularly assess international collaboration to identify effective initiatives that bolster diversification and supply resilience, mindful of the Union's international obligations.

The Rapporteur also emphasises that Commission services must be fully equipped and adequately resourced to carry out their new responsibilities under Article 24, as well as all other tasks foreseen in this Regulation, particularly the assessment and monitoring of strategic projects. Sufficient capacity is essential to ensure that targets are implemented effectively, projects are evaluated rigorously, and the Union can achieve its strategic objectives.

Lastly, the Rapporteur underscores that strengthening EU strategic autonomy in critical raw materials contributes to industrial, economic, digital and defence resilience. Ensuring that recyclable materials remain within the Union will reinforce supply security, while judicious assessment of export restrictions on secondary material streams can reduce avoidable losses and retain economic value within internal markets. Stronger obligations for large companies to prepare for supply disruptions, combined with enhanced recycling infrastructure and Union-level collection targets assessed in the 2028 evaluation, will help close material loops and unlock higher recycling rates. Leveraging relevant Union financial instruments and initiatives such as future competitiveness programmes and instruments, can further de-risk and accelerate strategic projects.

The Rapporteur is of the opinion that these targeted amendments create a coherent, technically achievable, and investment-friendly framework, which balances the needs of short-term industrial deployment with long-term strategic objectives, reinforces EU autonomy, and promotes a sustainable circular economy for critical raw materials.

## ANNEX: DECLARATION OF INPUT

Pursuant to Article 8 of Annex I to the Rules of Procedure, the rapporteur declares that he included in his report input on matters pertaining to the subject of the file that he received, in the preparation of the draft report, from the following interest representatives falling within the scope of the Interinstitutional Agreement on a mandatory transparency register<sup>1</sup>, or from the following representatives of public authorities of third countries, including their diplomatic missions and embassies:

<b>1. Interest representatives falling within the scope of the Interinstitutional Agreement on a mandatory transparency register</b>
WindEurope
H2D Global
VDA-Brüssel
Glencore
L'Association française d'économie politique (L' Afep)
Institut français des relations internationales (IFRI)
European Non-Ferrous Metals Association
EIT RawMaterials
European Environmental Bureau (EEB)
AMG Group
United Nations Economic Commission for Europe (UNECE)
European Aluminium AISBL
European Initiative for Energy Security (EIES)
Stichting Onderzoek Multinationale Ondernemingen (Somo)
SIRGE Coalition
Transport & Environment (T&E)
Resource Justice Network
The Netherlands Institute of International Relations Clingendael
The Hague Centre for Strategic Studies (HCCS)
Netherlands Organisation for Applied Scientific Research (TNO)
Nederlands Materialen Observatorium (NMO)
European Raw Materials Alliance
Leiden University
Erasmus University Rotterdam
Twente University
Planbureau voor de Leefomgeving
University of Bayreuth
Université de Bordeaux
Vienna University of Economics and Business
<b>2. Representatives of public authorities of third countries, including their diplomatic missions and embassies</b>
None

<sup>1</sup> Interinstitutional Agreement of 20 May 2021 between the European Parliament, the Council of the European Union and the European Commission on a mandatory transparency register (OJ L 207, 11.6.2021, p. 1, ELI: [http://data.europa.eu/eli/agree\\_interinstit/2021/611/oj](http://data.europa.eu/eli/agree_interinstit/2021/611/oj)).



