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RESourceEU: Demand aggregation, joint purchasing and strategic stocks in the context of the Critical Raw Materials Act

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On behalf of the ECGA, we welcome the European Commission's commitment to strengthen the EU's resilience and strategic autonomy. Europe faces rising supply security risks, global trade distortions, and growing competition for critical raw materials essential to its industrial and green transitions.

The ECGA very much appreciates the Commission's objective to diversify supply chains, boosting domestic processing and refining, promoting recycling and circularity as well as securing strategic raw material stocks. However, we have a few comments and concerns:

The Commission's initiative RESourceEU will have to be complemented by various measures, such as wider economic and legislative measures:

- **Focus on policies and economic measures** to de-risk investments in existing and new installations and operations. The Commission needs to address the current economic barriers that threaten operations and prevent investment in mining, refining, processing along the whole value chains. In particular:

Recognise the production of synthetic graphite and its products as an energy intensive and trade intensive sector in its own right, reflect this in the granularity of statistics and finally grant it its right for compensation of indirect CO2 costs;

Introduce energy cost-reduction measures and targeted financial support for energy-intensive synthetic graphite to maintain their viability amid global competition;

Protect current natural and synthetic graphite operations from unfair trade and subsidisation practices by global competitors;

Recognise the financial needs to both, the natural and the synthetic graphite sectors to maintain and extend their capacities in Europe to improve Europe's graphite supply chain resilience;

To secure access to raw materials for the synthetic graphite supply chain in terms of coke and coal tar pitch;

To ensure a certain percentage of European/local content throughout the supply chain wherever possible.

Recognise that both, natural and synthetic graphite are vital for the green transition and are used sometimes separately, but sometimes (batteries) in a complementary and that graphite in these cases is not a commodity but a highly specialised and customised product. This is important when discussing strategic stocks. In-depth discussions on types and specifications will be required.

- **Provide a stable legislative framework that avoids disproportionate regulatory burdens in a global context, providing predictability for investors and security for long-term operations.**

Avoid threatening supply chains and causing delocalisation by unnecessary legislative hurdles that are continuously introduced (e.g. REACH revision, OEL settings, IED BREF note revisions, soil monitoring requirements) and are making operations either no longer feasible at all or are increasing costs continuously)

Genuinely accelerated permitting processes for new projects as well as the extension of existing, consistent with the objectives of the Critical Raw Materials Act.

- **Enforce a genuine level playing field through robust trade-defence and anti-subsidy instruments, address overcapacities and adequate considerations on strategic partnerships with non-EU countries**

The building up of overcapacities in some countries are of great concern and need to be addressed;

The monitoring tools for imports of certain products (custom codes) and their granularity need to be improved;

The subsidisation of international competitors along their whole value chains needs to be addressed and European producers and investments need to be protected efficiently;

Ensure reciprocity in global trade relations, so that European producers benefit from fair access to external markets. Where reciprocity cannot be achieved, the EU should consider balanced measures—such as trade-defence actions, carbon border adjustments, or sustainability-based import criteria—to protect Europe's strategic industrial base.