

14 November 2025

To: Stéphane Séjourné, Executive Vice-President for Prosperity and Industrial Strategy
Cc: Kerstin Jorna, Director-General, DG GROW
Sabine Weyand, Director-General, DG TRADE
Timo Pesonen, Director-General, DG DEFIS
Eric Mamer, Director-General, DG ENV

Subject: Critical Raw Materials Alliance Recommendations for the RESourceEU Initiative

Dear Executive Vice-President Séjourné and Directors-General,

On behalf of the Critical Raw Materials Alliance, we welcome the European Commission's commitment to strengthen the EU's resilience and strategic autonomy through the RESourceEU initiative. This initiative comes at a pivotal time, as Europe faces rising supply security risks, global trade distortions, and growing competition for critical raw materials essential to its industrial and green transitions.

The CRM Alliance strongly supports RESourceEU's core objectives: diversifying supply chains, boosting domestic processing and refining, promoting recycling and circularity, and securing strategic raw material stocks. These actions are vital not only for Europe's competitiveness in electric mobility, renewable energy, and advanced manufacturing, but also for safeguarding the Union's long-term economic and strategic sovereignty.

The **execution phase of RESourceEU will be decisive**. Without clear instruments, adequate financing, and streamlined administrative processes, the initiative's ambition may remain aspirational. **The time to act is now**—Europe cannot afford to miss this opportunity to secure its industrial future and strategic autonomy in critical raw materials.

Our recommendations:

1. Focus on economics and de-risking

Fundamentally, a successful critical and strategic raw materials sector depends on economic competitiveness. This requires efficiently targeted funding and effective de-risking mechanisms.

A key shortcoming of the Critical Raw Materials Act is the absence of dedicated financial support. **RESourceEU should mobilise substantial financing to preserve and expand Europe's existing industrial base and to support new strategic projects.** RePowerEU already provides a model by combining multiple funding sources. A similar approach could be applied to RESourceEU by pooling unspent resources from instruments such as the Innovation Fund and Cohesion Funds.

Since these funds are delivered through national, regional, and interregional programmes developed in consultation with the Commission, **the Commission can play a pivotal role by establishing a framework budget line for European strategic projects in the production and processing of critical raw materials**, which would then be transposed at Member State level.

To ensure targeted economic support, we recommend that the Commission:

- **Undertake an assessment of what economic barriers prevent investment** in various critical raw materials mining, refining and wider value chains.
- **Identify what barriers prevent projects from accessing investment**, and what barriers prevent investors from financing projects.
- **Create a toolkit of interventions** that can be deployed to support and de-risk private financing of projects.

2. Protecting Europe's Existing CRM Industrial Base

To preserve Europe's industrial capacity and competitiveness, ReSourceEU should include targeted measures that strengthen existing CRM value chains. We urge the Commission to:

- **Introduce energy cost-reduction measures and targeted support** for energy-intensive raw materials and processing industries, including OPEX support and improved access to low-carbon electricity.
- **Ensure a harmonised and stable legislative framework across EU regulations especially energy, trade, environmental, sustainability and chemicals legislations** that avoids disproportionate regulatory burdens, providing predictability for investors and security for long-term operations.
- **Create the legal framework conditions** that facilitate the creation of lead markets for sustainable European raw materials, for instance by introducing sustainability and resilience criteria.

3. Concrete Support for New CRM Projects

ReSourceEU can only deliver its ambitions if new projects—spanning exploration, responsible mining, processing, and recycling—move from concept to implementation without delay. We therefore call for:

- **Genuinely accelerated permitting processes** for strategic projects, consistent with the intent of the Critical Raw Materials Act.

4. Protecting Against Unfair Competition

As international competition intensifies, European operators face growing risks from subsidisation and unfair trade practices abroad. The CRM Alliance calls on the Commission to:

- **Enforce a genuine level playing field** through robust trade-defence and anti-subsidy instruments.

- **Monitor imports effectively** to prevent market distortions and dumping.
- **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.

Conclusion

The CRM Alliance stands ready to contribute its technical expertise and industry insights to the development of RESourceEU. We share the Commission’s vision of a more secure, competitive, and autonomous Europe and urge that RESourceEU combine strong financing instruments, predictable regulation, and fair-trade safeguards to make that vision a reality.

Thank you for your continued leadership and commitment to advancing Europe’s strategic resilience in critical raw materials.

About us

The Critical Raw Materials Alliance (CRM-A) represents primary producers, traders and associations of raw materials that the European Commission has determined to be critical to the EU economy (CRMs). Critical Raw Materials (CRMs) are those raw materials which are economically and strategically important for the European economy but have a high-risk associated with their supply. Used in environmental technologies, consumer electronics, health, steelmaking, defence, space exploration, and aviation, these materials are not only “critical” for key industry sectors and future applications, but also for the sustainable functioning of the European economy.

The CRM-A stresses the need of a unique approach in regulation and policymaking when addressing CRMs to avoid overregulation, innovation barriers and loss of EU competitiveness and societal well-being.