



The image shows the back of a watch case, which is highly perforated with a grid of circular holes. In the center, there is a circular logo consisting of several thick, curved lines that resemble a stylized 'M' or 'W'. Below the logo, the text 'Aluminium - Magnésium' is engraved in a clean, sans-serif font. The entire watch case is shown in a light, monochromatic grey tone.

Aluminium - Magnésium

The European Critical Raw Materials Act: What it does and when it's coming to Greece

The 8th Greek Raw Materials Community Dialogue

Ioannis Zafeiratos, PhD
Directorate for Metallic, Energy and Industrial Minerals
Gen. Directorate for Mineral Raw Materials
Ministry of Environment and Energy
Greece
zafiratos.j@prv.ypeka.gr



ΥΠΟΥΡΓΕΙΟ
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& ΕΝΕΡΓΕΙΑΣ

The European Critical Raw Materials Act: What it does and when it's coming to Greece

The European Critical Raw Materials Act (CRMA) is at the heart of the EU's effort to address critical raw materials strategic dependencies and create resilient, and sufficiently diversified value chains.

On September 7, 2023, the European Parliament's Industry, Research and Energy Committee (ITRE) adopted the relevant report, and following this, the European Parliament voted on the file in plenary on September 14, 2023.

The CRMA will greatly impact many Greek companies in mining and in the critical raw materials supply chain (including but not limited to those who produce primary and secondary raw materials for the automotive industry, battery manufacturing, electric vehicles, renewables, etc).

Foremost, the CRMA will provide opportunities for these companies to access public and private financing for Strategic Projects. Moreover, the CRMA will streamline permitting procedures for these companies and will require Member States to designate a single national competent authority in charge of permit or license applications for extraction and processing of critical raw materials.

Greece strongly supports the proposal and takes part in the current legislative discussions at each of the relevant EU institutions – the European Commission, the Council of the European Union, and the European Parliament.

Why Greece is (and should be) concerned

In Greek territory and taking into account only State Mining Areas (i.e. in areas where the mineral rights belong to the State), there have been identified more than 15 mineral raw materials included in the list of Strategic and critical mineral raw materials. In particular, the CRMs found within the SMAs of Greece are: bauxite, phosphorite, baryte, antimony, nickel, cobalt, magnesium, silicon, tungsten, graphite, platinum group metals, arsenic, feldspar, gallium, germanium, manganese, copper and certain (light) rare earths. The total number of SMAs exceeds 200 and the surface area covered is thousands of km². 99% of these areas is undeveloped and not currently leased to mining companies. Therefore, there exists a significant opportunity to develop new projects, for exploration, exploitation and processing of critical and strategic RMs, benefiting from the CRM Act.

Regional Unit/Prefecture/Name of Mining Area	Total Area (km ²)	Mineral/Metal	Ore Reserves (Mt)/Metal Reserves (t) [7]
Chios island, Rodopi	908,33	stibnite/antimony	
Mykonos, Milos, Kimolos, Polyaihos islands	302,88	barite/gold, silver	
Fthiotida, Fokida, Evia island	491,93	Bauxite/rare earths	1,97
Drama, Kozani, Grevena, Larissa, Pieria, Fthiotida, Fokida, Ioannina	1327,13	chromite	0,25
Kilkis, Chalkidiki, Serres, Imathia, Kozani, Grevena, Larissa, Fthiotida, Fokida	826,55	copper ores (oxides and sulfides)	32,92
Arcadia	11,25	dolomite	6,00
Naxos island	429,79	emery	
Drama, Chalkidiki	155,44	Si-feldspars	12,25
Evros, Rodopi, Xanthi, Kavala, Kilkis, Serres, Thessaloniki	1091,12	alluvial Au	21,60/41667 Oz
Evros, Rodopi, Serres, Chalkidiki, Kozani, Grevena	677,34	Au ore	10,21/1670450 Oz
Serifos island, Lesvos island, Larissa, Pieria, Kavala, Drama, Kilkis	885,05	iron, manganese, rare earths	
Evia island, Chalkidiki	133,62	magnesite	10,55
Chalkidiki, Drama, Serres, Larissa, Messinia, Argolida, Korinthia, Andros island	1361,32	manganese/Mn	2,26/452000
Evros, Samothraki island, Rodopi, Serres, Chalkidiki, Kavala, Kilkis, Lakonia, Xanthi, Pella, Samos island, Syros island, Antiparos island	1851,99	mixed sulfides/Pb, Zn, Ag	28,04
Kilkis	8,56	molybdenite/Mo	4,80/12000
Fthiotida, Viotia, Evia island, Pella	339,07	laterite/Ni, Co	54 /432000, 27000
Ioannina, Preveza	657,55	phosphorite, rare earths	15,25
Chalkidiki	35,2	tungsten scheelite	
Thessaloniki	17	talc	
Serres	20	uranium ore/UO ₂	/450
Xanthi	100,42	graphite/C	0,40/24000

The Commission's proposal

On 14 September 2022, European Commission president Ursula von der Leyen presented the idea of the CRMA. The Commission then provided substance to this vision, unveiling its CRMA proposal for a Regulation, on 16 March 2023. This was part of the Green Deal Industrial Plan and was presented in parallel with the EU's Net Zero Industry Act.

The CRMA:

sets a regulatory framework for selecting and implementing strategic raw materials projects in EU Member States,

develops a mechanism for the coordinated monitoring of critical raw materials supply chains, and

adopts measures for mitigating supply risks.

The core objectives of the CRMA are:

to support the development of domestic capacities and

to strengthen circularity of the critical raw material supply chains in the EU.

It codifies into law the list of critical raw materials and new strategic raw materials under the framework of the Regulation and includes a criticality assessment (based on the economic importance and supply risk of the raw materials) which will be used to periodically update the critical raw materials list.

The Commission's proposal

The Regulation also sets benchmarks for improved domestic capacities in the EU along the critical raw materials supply chain and increased diversification of supply to the EU. These benchmarks include that:

- At least 10% of EU annual consumption from extraction within the EU by 2030;
- At least 40% of EU annual consumption must be processed and refined within the EU by 2030;
 - At least 15% of EU annual consumption sourced from recycling by 2030; and
- Not more than 65% of the EU annual consumption of each critical raw material, at any stage of processing, should come from a single third country by 2030.

These benchmarks are non-binding objectives that are supported by proposed new measures such as:

a new framework for identifying and implementing Strategic Projects,
enabling conditions for Strategic Projects' access to financing (including state aid and EU funds),
streamlined permitting processes (Member States are required to provide all critical raw materials projects with a one-stop-shop for all relevant permits), and
national requirements to develop exploration programmes in the EU.

Thus far, the general consensus appears to be that these benchmarks are unlikely to be met in all the critical raw materials sectors – but there is some optimism that strategic partnerships with historic allies and reliable partners will help fill the gap.

The Council position

Since the Commission proposal was published, the co-legislators (the European Parliament and Council of the European Union) had to adopt their respective positions. The Council adopted its position (general approach) on 30 June 2023, which was even more ambitious than the Commission's proposal in certain respects.

Namely, the Council proposes:

to increase the benchmarks for processing and recycling:

from 40% to 50% for processing and refining within the EU by 2030; and

from 15% to 20% for sourcing from recycling by 2030.

to add Bauxite Alumina/Aluminium to the list of strategic or critical raw materials.

To reinforce national measures on sustainability and circularity, the Council also proposes:

to increase the re-use of products with high potential for recovering raw materials,

to incentivise the recovery of secondary critical raw materials from waste,

to identify extractive waste facilities where secondary raw materials can be recovered, and

to promote magnet recovery from products at their life-end.

To reduce bureaucratic hurdles and streamline permit procedures for Strategic Projects, the Council suggests further simplified and expedited permit procedures for Strategic Projects. It also proposes stricter monitoring obligations concerning competition and the free movement of raw materials to ensure the smooth operations of the internal market with regard to critical raw materials.

The Parliament position

The Parliament prepared its position (report), the work for which was conducted on behalf of the Parliament's Industry, Research and Energy Committee (ITRE). The report presented in May 2023, was subsequently adopted by lawmakers in the ITRE Committee on 7 September 2023 (with 53 votes to 1, and with 5 abstentions).

The report includes amendments focusing on:

- fostering SMEs participation in critical raw materials supply chains.
 - further streamlining permitting procedures.
- avoiding market distortion in the process of setting and maintaining of EU stocks of critical raw materials in cooperation with private economic operators.
 - updating the critical raw materials list more frequently.
- strengthening economic incentives for companies to invest and produce in Europe.

When it comes to targets, the report calls for additional recycling capacity sub-targets per material: agreeing with or adding to the Council proposal:

that 50% of the critical raw materials consumed in the EU would need to be processed inside the bloc by 2030.

to have existing recycling-sourced capacities to be increased by 7.5 % per raw material in addition to the Commission's aggregated recycled materials target (15% of the EU's annual consumption)

to foster alternatives by allowing projects that directly substitute strategic or critical raw materials in the value chains to be recognised as Strategic Projects, granting them a series of benefits.

The Greek position

1. Regarding the inclusion of the raw materials Bauxite, Alumina and Nickel with a degree of purity not intended for batteries, it should be noted that Alumina (Al_2O_3) and Ferronickel alloy (FeNi) are produced in Greece primarily from bauxite and laterite, respectively. It is therefore stressed that a regulatory inclusion in Article 3 (a) entitled exclusively 'Secondary Strategic Raw Materials' should be avoided as the term 'secondary' refers to materials produced secondarily from waste stream treatment (for this reason EP includes scrap). As our country is the only bauxite and laterite producer in the EU, Greece adheres to the view of the inclusion of primary Bauxite, Alumina and Nickel/Cobalt in the Strategic and Critical Raw Materials and in the relevant Annexes I and II of the CRM Act.

2. Regarding the proposal to add a separate article 4 (a) entitled 'Benchmarks', Greece agrees.

3. Regarding the three proposed formalities of the EU recycling capacity provided for in Article 5 (1):
Union recycling capacity, including for all intermediate recycling steps, to produce at least 20% of the Union's annual consumption of strategic raw materials.

Union recycling capacity, including for all intermediate recycling steps, to increase at least + [10] % volume

Union recycling capacity, including for all intermediate recycling steps, to recycle at least [XX] % of each strategic raw material contained in the Union's waste streams defined in the [implementing] acts referred to in Article 25 (7).

It is noted that the recycling sector is outside our service's competence, however Greece is positive to Proposal 3 (Option 3) as it focuses individually on each Strategic Raw Material and therefore it will be clearer to measure their respective recycling effectiveness.

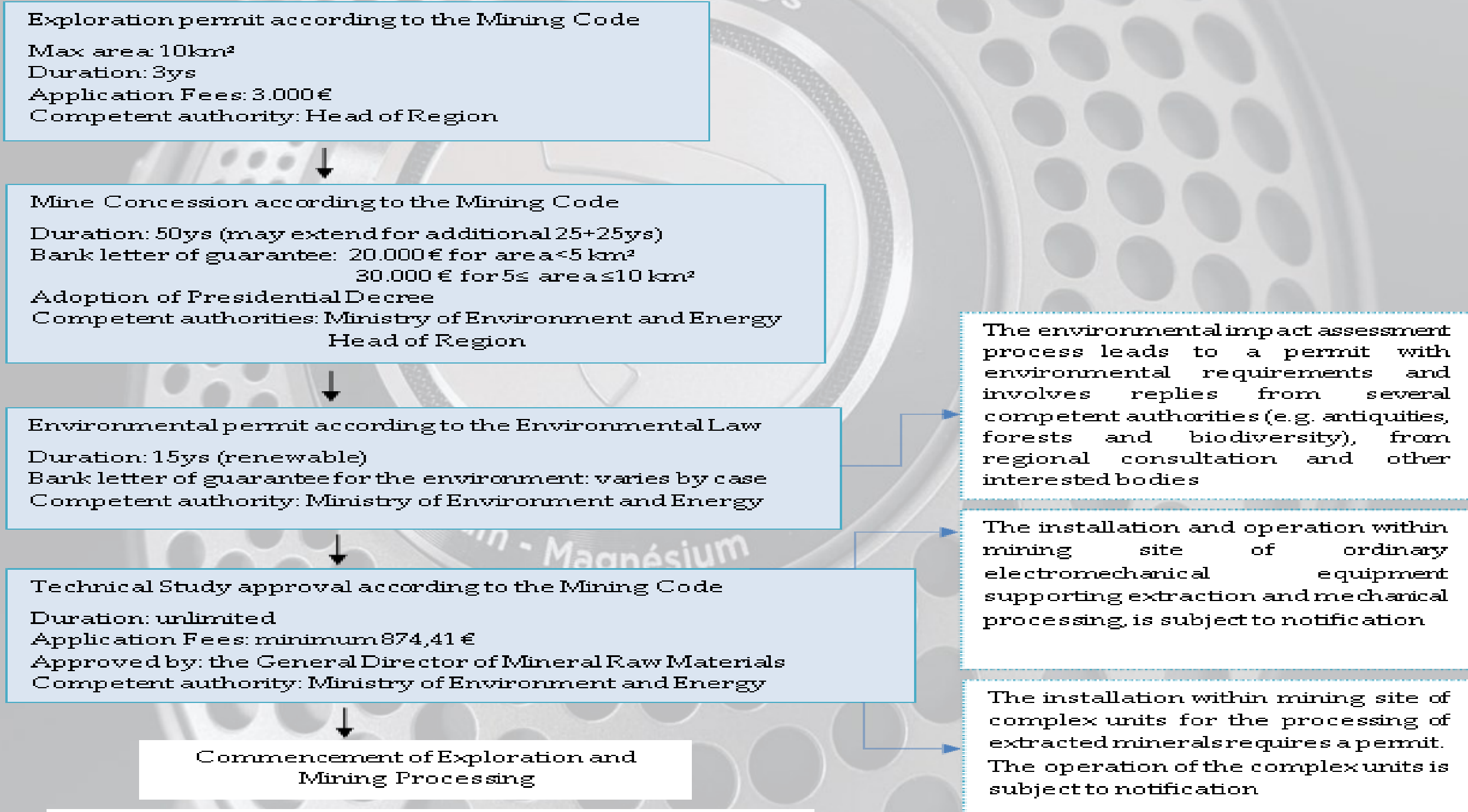
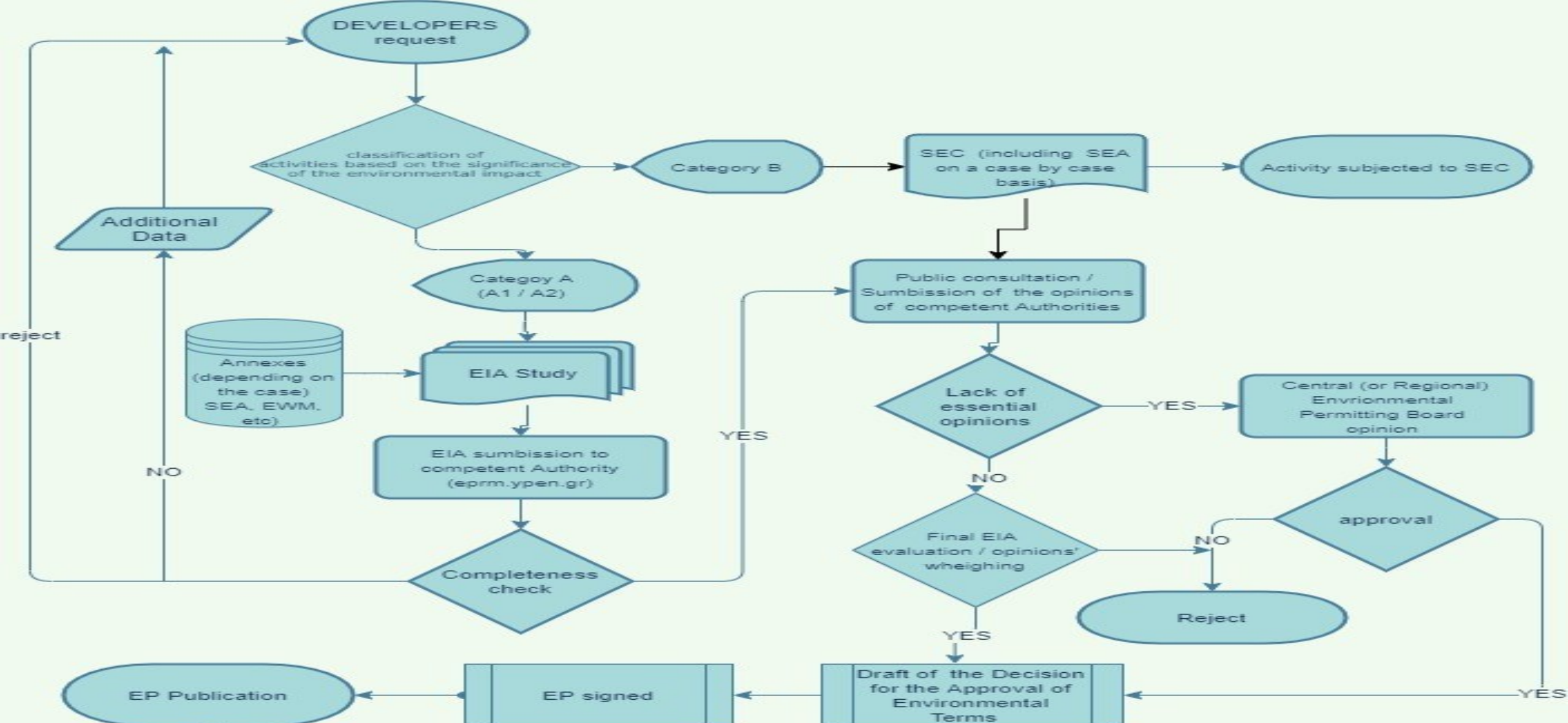


Figure 3. Permitting steps to start up a mine



eprm.ypen.gr
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EIA : Environmental Impact Assessment
 EP : Environmental Permit
 EWM : Extractive waste management plan. According to JMD 39624/2209/E103/2009 (GG B'2076) in compliance with Directive 2006/21/EC and BAT Reference
 SEA : Specific Ecological Assessment for NATURA 2000 areas. According to: for category A- MD 170225/2014 (GG B'135), for category B- MD 52983/1952/2013 (GG B'2436)
 SEC : Standard Environmental Commitment for B category. According to MD 46294/2013 (GG B'2001)

The Greek position

4. Regarding the provision of Article 8 and the proposal concerning the Point of Single Contact service (PSC):

- Greece considers that in Greece this concept cannot operate as proposed by the Council, as the licensing of mining projects in Greece is based on a multi-stage bureaucratic process, which cannot be easily monitored by an individual officer (or office). Coordination of a multitude of diverse competent authorities as well as influencing of the whole process towards acceleration is completely out of the picture. The establishment of focal points will simply create another link in the licensing chain, as these points will act as "transmitters" or "intermediaries" with no power to intervene and this is not likely to solve problems. If what we are interested in is simply that the licensing agencies are not involved in the management of licensing applications and that an "intermediary" oversees the applications handling instead, possibly such a system would be viable.
- However, if we want to give a real 'strategic' character to an investment plan, then we should adopt the creation of a single higher level special Competent Authority (One Stop Shop) which will take away the bureaucratic burden from the whole process. In addition, it should also have the corresponding institutional consolidation at national level and not only invoke the provisions of the European Regulation, which, if not further specified, will be incompletely implemented and at will.
- It goes without saying that the ideal situation of a One Stop Shop Authority which will exclusively authorize relevant CRM investment plans, both technically and environmentally, probably cannot proceed right now in Greece, as the necessary conditions for that are not in place. Perhaps, the Regulation itself should put forward a "compromise" solution, that is, leave it to the member states to decide whether to designate a Point of Single Contact or a Competent Authority, depending on the member's own specific regulatory framework.

A view on the expected next steps and timeline to implementation.

- Following the CRMA approval in the Parliament's plenary session on 14 September 2023, trilogue negotiations have started between the Council and Commission in the hope that a provisional agreement on the file can be reached by the end of the year 2023.
- The agreement would then be subject to votes on its adoption before becoming law.
- Based on the assumption that the act would be accepted by the EU trilogue lawmakers, it should be published in the Official Journal of the EU by March 2024 (?).
- 20 days later it would enter into force and be binding in its entirety and directly applicable in all EU Member States.
- 180 days later it will be embodied to Member State Law.