

## Response ID ANON-1PN4-DH3U-Q

Submitted to Regulation (EU) 2024/1252 establishing a framework for ensuring a secure and sustainable supply of critical raw materials and amending Regulations (EU) No 168/2013, (EU) 2018/858, (EU) 2018/1724 and (EU) 2019/1020

Submitted on 2024-05-22 16:57:50

### Consent

The Windsor Framework Democratic Scrutiny Committee would like your permission to publish your consultation responses.

Please indicate your publishing preference.

### Publish response

What is your organisation (if any)?

Organisation: Mineral Products Association NI

### Impact of EU Act

**1 Does it appear likely that the EU act would have a significant impact specific to everyday life of communities in Northern Ireland in a way that is liable to persist?**

No

#### Tell us why :

Access to deposits of critical minerals would be limited and confined to small areas. Any such extractive operations would be carried out in a tightly regulated and controlled environment. However the value of such critical minerals and the high skilled jobs involved would have a positive impact both economically and socially in rural areas where the extraction of the critical minerals will take place. Permitting such operations will also mean that these essential materials will give security of supply of these materials so that we dont have to depend on supplies from other unstable parts of the world.

**2 Does it appear likely that NOT APPLYING the EU act would have a significant impact specific to everyday life of communities in Northern Ireland in a way that is liable to persist?**

Yes

#### Tell us why:

If such deposits of critical minerals are located in NI then not applying the EU Act would mean a lost economic and social opportunity in both the creation of high paid jobs and NI not contributing to the securing of vital and essential critical minerals.

**3 Are there any other matters regarding the EU act that you wish to draw to the Committee's attention? Please note, any information provided should be of an evidential nature rather than a commentary.**

No

#### Tell us why:

The GSNI, part of the Department for the Economy, have data that shows that in certain locations NI has deposits of valuable and critical minerals essential to providing high tech equipment and zero carbon renewable energy technology.

## Response ID ANON-1PN4-DH33-N

Submitted to Regulation (EU) 2024/1252 establishing a framework for ensuring a secure and sustainable supply of critical raw materials and amending Regulations (EU) No 168/2013, (EU) 2018/858, (EU) 2018/1724 and (EU) 2019/1020

Submitted on 2024-05-24 21:54:20

### Consent

The Windsor Framework Democratic Scrutiny Committee would like your permission to publish your consultation responses.

Please indicate your publishing preference.

### Publish response

What is your organisation (if any)?

Organisation: Critical Minerals Association (UK)

### Impact of EU Act

**1 Does it appear likely that the EU act would have a significant impact specific to everyday life of communities in Northern Ireland in a way that is liable to persist?**

Yes

#### Tell us why :

Application of this act would allow for reasonable parity with EU-based businesses which are operating in the Critical Raw Materials space. The extractives sector would enjoy the privileges of a potential strategic project designation – leveraging access to grant funding and investment from the wider bloc, and projects of strategic importance would be supported by streamlined permitting processes. It would enable access to critical mineral containing material for recycling and trading businesses from the EU market, adding value in the Northern Ireland economy and creating skilled jobs and opportunities for investment, at both a regional and national scale. The act would enhance community development by creating an environment for Critical Raw Materials businesses to succeed and therefore bring community benefit through jobs, supplier activity, and the associated services that these businesses and projects would require.

**2 Does it appear likely that NOT APPLYING the EU act would have a significant impact specific to everyday life of communities in Northern Ireland in a way that is liable to persist?**

Yes

#### Tell us why:

By not applying this EU act, Northern Ireland would be forfeiting the opportunity to enjoy the benefits pertaining to the single market for goods, which would be a missed opportunity. Access to the EU market and to the CRM Act as outlined in Regulation (EU) 2024/1252 would enable businesses and communities in Northern Ireland dual access to both the EU market and the UK. Policy support, grant funding opportunities, and designations as strategic projects can be expected from both the EU and UK. In turn, this will facilitate investment, drive growth, and create skilled jobs and supply chain opportunities for communities in Northern Ireland. Not applying the EU act would

constrain Northern Ireland's businesses and communities from both a business and regional development perspective, when the Windsor Framework enables the application of EU legislation for the benefit of trade with Ireland, and by extension, the wider EU single market. EU-based businesses would likely be deterred from trading with Northern Ireland-based businesses for products and sale of material containing CRMs. The maximum value of the wind sector, for example, would not be realised through Northern Irish ports due to being non-aligned with this act. The potential export of critical raw materials from recyclers or primary materials from mining operations would not be fully captured. By extension, job creation and other opportunities in the wider supply chain in Northern Ireland around these CRM projects and businesses would also be impacted negatively by a decision to not apply the act.

**3 Are there any other matters regarding the EU act that you wish to draw to the Committee's attention?**

Please note, any information provided should be of an evidential nature rather than a commentary.

Yes

**Tell us why :**

The Critical Minerals Association (CMA) was founded in 2020 to provide a unified voice for the UK critical minerals sector operating domestically and abroad. The association operates through industry-led working groups to ensure its messages and activity are reflective of industry priorities. The CMA represents 40 companies across the upstream and midstream sectors of the supply chain. Our membership is incredibly diverse. It encompasses small exploration firms, some of the largest mining companies globally, legal representatives, financiers and consultants who specialise in environment, social and governance (ESG). Businesses that are based in Northern Ireland who are operating in the CRM context will likely miss out on an opportunity to trade in high-value goods within the EU single market if the act is not incorporated. The act aims to simplify and move towards standardisation of many of the complexities surrounding international standards, environmental assessments, and definitions on waste and recycling. All UK businesses will have to move in-line with these developments to remain competitive in the CRM market, across the EU and further afield. Consistency and alignment are key in this fast-moving sector and Northern Ireland has an opportunity to capitalise on this due to the provisions set out in the Windsor Framework.

## Response ID ANON-1PN4-DH37-S

Submitted to Regulation (EU) 2024/1252 establishing a framework for ensuring a secure and sustainable supply of critical raw materials and amending Regulations (EU) No 168/2013, (EU) 2018/858, (EU) 2018/1724 and (EU) 2019/1020

Submitted on 2024-05-24 16:18:29

### Consent

The Windsor Framework Democratic Scrutiny Committee would like your permission to publish your consultation responses. Please indicate your publishing preference.

**Publish response anonymously (this will remove all personal identifiers including name and organisation)**

### Impact of EU Act

**1 Does it appear likely that the EU act would have a significant impact specific to everyday life of communities in Northern Ireland in a way that is liable to persist?**

Yes

#### Tell us why :

The EU Act has the potential to provide significant benefit to communities in Northern Ireland via stimulation of Critical Minerals supply chain activity, particularly in the recycling space. This is very complimentary to the growth of offshore wind supply chain businesses in the province. It will create commercialisation opportunities for businesses to contribute to the benchmarks in the EU Act. The EU Act suggests that benchmarks will be met via in EU recycling capacity. NI based businesses can contribute to this target and thus bring economic benefit to communities in NI. An obvious potential issue with this target in general is adequate material to be recycled, and then capability / capacity to recycle it. NI based Critical Minerals recycling businesses would expect to compete with other recycling businesses (across Europe) for access to the material available for recycling, and would not expect any impedance in sourcing this material. Inclusion of NI within the EU Act would be beneficial for NI communities, because it would enable competitive recycling businesses to operate in the province. The Act also provides some recognition that Critical Minerals containing material should be recognised as of-value and not necessarily waste and this again will benefit recycling businesses.

**2 Does it appear likely that NOT APPLYING the EU act would have a significant impact specific to everyday life of communities in Northern Ireland in a way that is liable to persist?**

Yes

#### Tell us why:

If the Act is not applied, communities are likely to be detrimentally impacted as the attractiveness of commercialising Critical Minerals recycling in NI is reduced. If NI is not included, third parties could elect not to supply material to NI based businesses for recycling purposes as it may not contribute to benchmarks. This jeopardises the potential to commercialise Critical Minerals recycling as products would not necessarily be saleable to EU businesses as "recycled in EU". Any divergence between NI and EU policy that disincentives EU businesses from buying products from a business based in NI would be detrimental to the prospect of development of commercial scale plants in NI. Given that a vast quantity of material, containing Critical Minerals, to be recycled originates from wind turbines

and other net zero technologies, and that its value is proportionally much greater than other components, not applying the EU Act could deter investment in NI based facilities, and this in turn could deprive NI communities of a significant wind technology decommissioning industry (wind turbine Rare Earth Permanent Magnets represent about 1% of wind turbine mass, but about 45% of the value). If the Act is not enacted in NI, businesses operating here could be incentivised to export material containing Critical Minerals at End of Life, rather than supporting recycling businesses in NI.

**3 Are there any other matters regarding the EU act that you wish to draw to the Committee's attention? Please note, any information provided should be of an evidential nature rather than a commentary.**

Yes

**Tell us why :**

The 25% benchmark for Critical Minerals originating from recycling processes, in the EU. Failure to enact the EU Act in NI could deter supply chain actors from selecting businesses in NI to recycle material. Businesses looking to enter the space must be supported, as businesses in EU are (via Innovation Fund and similar) to derisk capital solutions, attract and retain the right investment, and provide ongoing incentives to help new companies achieve steady state commercial scale. Critical minerals application spans multiple industries and underpins hundreds and thousands of existing jobs in the EV sector alone, not to mention new job creation, and these existing industries need certainty on raw materials, which is a big part of why the EU Act exists.