

ESPP input to EU [consultation](#) on Critical Raw materials Centre

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ESPP welcomes the proposal to establish a Critical Raw Materials Centre to support CRM projects in accessing public and private finance and address market and supply chain challenges.

There are currently a confusing number of EU initiatives and EU-funded centres: [Critical Chemicals Alliance](#), [CRM Facility](#), [Strategic Projects](#), [CRM Alliance](#), [SCRREEN](#) (1, 2 and 3), [EIT Raw Materials](#), [Fertilisers Action Plan](#), [Raw materials Week](#) **The proposed ‘CRM Centre’ should ensure coordination, avoid duplication, and must enable plans and policies to move to concrete actions for funding and supply chains.**

The Call for Evidence proposal states that CRMs are essential for green, digital, defence and aerospace technologies. It should be noted that CRMs also underpin other vital sectors, including food security, health and infrastructure.

The EU CRM Act 2024/1252 identifies both “Phosphate Rock” and “Phosphorus” (meaning elemental P4) as CRMs:

- **Phosphate Rock** is essential for agriculture (farm economics, food security) and for EU food sovereignty. Without mineral phosphate fertilisers we could feed maybe 1/5th of the current world population (adapted from [Dawson et al., Food Policy 2011](#)). Today, the EU imports 80-90% of our phosphate needs and is still importing 20-30% of our phosphate fertilisers from Russia.
- **“Phosphorus” (P4)** is essential for all Strategic industries, including electronics (microchip etching, fire safety), photovoltaics, hydraulic fluids for aviation, electrolytes of all types of lithium-ion battery ... Today, the EU is 100% import-dependent for P4 (no EU production), with imports coming >80% from one supplier in Kazakhstan. ESPP therefore considers that “Phosphorus” (P4) should be listed as “Strategic” in the CRM Act.

ESPP notes that the Call for Evidence states an objective to recycle 25% of EU consumption of CRMs whereas in art. 5.1.iii and Recital 11 of the CRM Act this benchmark refers to “Strategic” Raw Materials only. We suggest that the upcoming Circular Economy Act should modify this wording of the CRM Act.

The Call for Evidence indicates an expected increase in CRM recycling (under “Likely Impacts”). ESPP suggests that it should be made explicit that the CRM Centre activities will support CRM recycling projects, and that its market stabilisation, defragmentation and intelligence activities will actively address markets for recycled CRMs and secondary streams offering CRM recovery potential.

ESPP suggests that the upcoming EU Circular Economy Act should ensure that regulatory proposals (e.g. on End-of-Waste and Mutual Recognition, defragmentation of secondary materials markets and transport, ...) should be adapted for the CRM “Phosphate Rock” by taking into account the specific challenges of bio-derived secondary materials and the need for safety and consumer confidence in the agri-food chain (food, health and environment safety). The Circular Economy Act should anticipate the CRM Centre, in particular with regulatory facilitation of recycling projects and secondary material markets. The Circular Economy Act should also implement the regulatory actions announced in the EU Fertiliser Action Plan, both for nitrogen (given the current supply and price crisis) and for the CRM “Phosphate Rock”

See:

[Joint Call for Nutrients in the EU Circular Economy Act](#)”.

[Joint Declaration calling for phosphorus \(P4 and derivatives, Purified Phosphoric Acid\) to be in the EU Strategic Raw Materials List](#),