

(English version)

**Question for written answer E-003556/25
to the Commission
Maria Ohisalo (Verts/ALE)
(16 September 2025)**

Subject: Study on the expected production volume of strategic projects

In order for the Commission to recognise strategic raw material projects, the projects concerned must meet the recognition criteria set out in Article 6(1) of Regulation 2024/1252 ⁽¹⁾. In line with those criteria, projects must make a meaningful contribution to the security of the Union's supply of strategic raw materials (Article 6(1)(a)); they must be feasible within a reasonable timeframe and it must be possible for the expected production volume of the projects to be estimated with a sufficient level of confidence (Article 6(1)(b)); and the projects must be implemented sustainably (Article 6(1)(c)).

The expected production volume in mining projects can be estimated based on a profitability study resulting from a multi-stage research process. This is a document on the basis of which a decision can be taken to open and finance a mine (Larsen et al 2016) ⁽²⁾.

When it comes to assessing whether a project is feasible within a reasonable timeframe and whether its expected production volume can be estimated with a sufficient level of confidence (Article 6(1)(b)), does the application require:

1. a final profitability study for the project?
2. a report based on a profitability study of how significant the project is with a view to achieving the strategic objectives of the Critical Raw Materials Act, in terms of both timing and quantity?

Submitted: 16.9.2025

**Answer given by Executive Vice-President Séjourné on behalf of the European Commission
(29 October 2025)**

The Critical Raw Materials Act ⁽¹⁾ (CRMA) sets out in Annex III the elements and evidence to assess the criteria laid down in Article 6(1).

Specifically, the assessment of whether a project fulfils the criterion laid down in Article 6(1b), shall take into account the quality of the feasibility studies carried out on the potential of the development of the project and whether the intended technology has been demonstrated in the relevant environment.

The Guide for Applicants ⁽²⁾ indicates project technical feasibility should include e.g. the technical readiness level of the foreseen processes and the risks related to the methods and technology used, including its scalability.

The CRMA does not specifically require '*a final profitability study for the project nor a report based on this study to assess the contribution to the CRMA benchmarks*'. However, the information on the profitability is part of the mandatory project's business plan.

In fact, the CRMA sets out in Article 7 the information to be included in the application including a business plan evaluating the financial viability.

In addition, Annex III sets out the project's contribution to the relevant CRMA capacity benchmarks shall be assessed taking into account the business plan, supporting technical information and the estimated time to market. The Guide for Applicants indicates the specific aspects expected to be covered by the business plan.

¹ https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=OJ:L_202401252

² <https://link.springer.com/article/10.19150/mmp.6842>.

⁽¹⁾ <https://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=CELEX:02024R1252-20240503>.

⁽²⁾ https://single-market-economy.ec.europa.eu/sectors/raw-materials/areas-specific-interest/critical-raw-materials/strategic-projects-under-crma/guide-applicants_en.