



2025/0385(COD)

16.4.2026

COMPROMISE AMENDMENTS

1 - 6

Draft opinion

Marit Maij

(PE785.239v01-00)

Amending Regulation (EU) 2024/1252

Proposal for a regulation

(COM(2025)0946 – 2025/0385(COD))

Amendment 1 Marit Maij

Compromise Amendment replacing Amendment(s): 1, 2, 10, 11, 12, 13, 15, 16, 17, 22, 24, 31, 32, 36, 20, 43 and 14

Proposal for a regulation Recital 2

Text proposed by the Commission

(2) Access to secure and sustainable critical raw materials is essential for the Union's objectives of clean and digital transition as set out in the Clean Industrial Deal³. They are also essential components for the Union's industries, in all areas including defence. Due to the current geopolitical situation the Union's supply and security of critical raw materials is put at risk and therefore, the current framework should be strengthened.

Amendment

(2) Access to secure and sustainable critical raw materials is essential for the Union's objectives of clean and digital transition as set out in the Clean Industrial Deal³. They are also essential components for the Union's ***strategic autonomy and its*** industries, in all areas including defence. Due to the current geopolitical situation the Union's supply and security of critical raw materials is put at risk and therefore, the current framework should be strengthened, ***taking into account the need for greater resource efficiency and circularity. Global markets for several strategic raw materials are highly concentrated, particularly in the processing stage, which is often dominated by a limited number of third countries, including competing actors. The Union should therefore pursue diversification of supply and strengthen cooperation with reliable partners and preferential trade partners to improve access to critical raw materials and promote fair and transparent markets.***

(2a) Due to critical disruption risks posed by conflicts and crises, as well as by environmental hazards, and their consequences on human displacements, the current framework for risk preparedness should be reinforced by conflict-sensitive and environmental sensitive risk analysis.

(2b) The Commission should promote full transparency and full traceability across the entire supply chain to ensure

alignment with the EU's strategic priorities and engagement in resource-rich partner countries and regions, and to secure the Union's sustainable access to raw materials. The Commission should promote compliance with all international instruments concerning responsible business conduct, responsible governance and responsible supply chains, as mentioned in Annex III of the Regulation (EU) 2024/1252.

(2c) The Commission's risk mitigation strategy for large companies for secure and sustainable supply of critical raw materials should be in line with the Sustainable Development Goals, and should contribute to sustainable economic development, in line with policy coherence for development and Article 208 TFEU. Cooperation with partner countries, in particular low and middle income countries, notably in Africa, should also contribute to the local development of sustainable processing, refining, manufacturing and recycling and extraction capacities, ensuring that raw materials are not only exported but also transformed locally; the strategy should contribute to diversified supply chains, decent employment and creation of local industrial capacities and added value, benefiting both the Union and local partners, while respecting their development priorities.

³ COM(2025) 85 final

³ COM(2025) 85 final

Or. en

Amendment 2

Marit Maij

Compromise Amendment replacing Amendment(s): 3, 4, 20, 21, 22, 23, 24, 25 and 19

Proposal for a regulation

Recitals 4, 5 and 5a (new)

Text proposed by the Commission

(4) Under Regulation (EU) 2024/1252, Member States are required to identify large companies by May 2025 and within 12 months of each update of the list of strategic raw materials pursuant to Article 3(3). Nevertheless, large companies that use critical raw materials can operate in more than one Member State. To avoid a duplication of the identification of these large companies by the various national administrations and to prevent a risk of fragmentation of the Single Market, it should be for the Commission to identify these large companies operating in the Union.

(5) It is essential to strengthen the risk preparedness of the large companies that are identified by the Commission, it is essential that their obligations are strengthened, and therefore large companies should be required to take measures to mitigate their vulnerabilities, including by diversifying their raw material supply chain.

The Commission should be able to receive the information regarding their compliance necessary for an effective monitoring and ensure they are prepared in case of supply disruption. The Commission should specify

Amendment

(4) Under Regulation (EU) 2024/1252, Member States are required to identify large companies by May 2025 and within 12 months of each update of the list of strategic raw materials pursuant to Article 3(3). Nevertheless, large companies that use critical raw materials can operate in more than one Member State. To avoid a duplication of the identification of these large companies by the various national administrations and to prevent a risk of fragmentation of the Single Market, it should be for the Commission to identify these large companies operating in the Union.

(5) It is essential to strengthen the risk preparedness of the large companies that are identified by the Commission, it is essential that their obligations are strengthened, and therefore large companies should be required to ***ensure traceability of strategic raw materials and to take due diligence measures to identify and*** mitigate their vulnerabilities, including by diversifying their raw material supply chain ***and by sourcing from a broader range of reliable partners and strategic partner countries, building on strengthened international partnerships for critical raw materials. These vulnerabilities include long-term risks that outweigh short-term financial costs, such as disruptions to supply chains caused by civil unrest, which could to a certain extent be mitigated by consideration for local communities and environmental impacts, including respect for human rights of women, children and workers.***

The Commission should be able to receive the information regarding their compliance necessary for an effective monitoring and ensure they are prepared in case of supply disruption. The Commission should specify

the mitigation measures that large companies should adopt in case of vulnerabilities, it should be able to do so by means of delegated acts.

the mitigation measures that large companies should adopt in case of vulnerabilities, it should be able to do so by means of delegated acts. *Where relevant, mitigation measures should be based on meaningful stakeholders engagement including with local communities, indigenous peoples and civil society organisations (CSOs), in order to enhance the long-term viability and sustainability of supply chains as well as to take into account economic conditions and development needs of partner countries.*

(5 a) To enhance the resilience of the Union's supply of critical raw materials, the Commission should bring to the attention of large companies the potential benefits of strategic partnerships, relevant cooperation agreements, including bilateral agreements, and projects, including Global Gateway investment projects relating to critical raw materials in partner countries, with a view to supporting diversification and mitigating supply chain risks, while ensuring that these projects do not fuel conflicts and that negative impacts on the environment and communities are prevented or minimized, including in the permitting phase.

Or. en

Amendment 3 Marit Maij

Compromise Amendment replacing Amendment(s): 5, 26, 27 and 28

Proposal for a regulation Recital 6

Text proposed by the Commission

(6) Large companies should, as part of that risk assessment, map where the strategic raw materials they use are

Amendment

(6) Large companies should, as part of that risk assessment, map where the strategic raw materials they use are

extracted, processed and recycled from, and analyse the factors that could affect their supply and assess their vulnerabilities to supply disruptions. In order to have a clear understanding of their vulnerabilities, they should also map the supply chain of the components containing critical raw materials. To reinforce their preparedness large companies should report on their risk assessment to the companies' board of directors or management board.

extracted, processed and recycled from, ***in order to ensure traceability***, and analyse the factors that could affect their supply and assess their vulnerabilities to supply disruptions ***taking into account the availability of data. Risk assessments should be based on conflict-sensitive and environmental-sensitive analysis***. In order to have a clear understanding of their vulnerabilities, they should also map the supply chain of the components containing critical raw materials. To reinforce their preparedness large companies should report on their risk assessment to the companies' board of directors or management board.

Or. en

Amendment 4 **Marit Maij**

Compromise Amendment replacing Amendment(s): 6 and 29

Proposal for a regulation **Recital 7**

Text proposed by the Commission

(7) The Commission should continue to monitor the situation and the risk preparedness of large companies, ensuring their readiness in case of disruption of their supply chains. To that end, and when it decides so, the Commission can request information from large companies on their compliance and mitigation measures as required by this Regulation.

Amendment

(7) The Commission should continue to monitor the situation and the risk preparedness of large companies, ensuring their readiness in case of disruption of their supply chains ***or when incurring an irreversible damage to the communities or the environment***. To that end, and when it decides so, ***taking into consideration European Parliament Resolutions***, the Commission can request information from large companies on their compliance and mitigation measures as required by this Regulation.

Or. en

Amendment 5
Marit Maij

Compromise Amendment replacing Amendment(s): 7, 40 and 41

Proposal for a regulation

Article 1 – paragraph 1 – point 2 – point d

Regulation (EU) 2024/1252

Article 24 – paragraph 4

Text proposed by the Commission

4. If significant vulnerabilities to supply disruptions are detected as a result of the risk assessment referred to in paragraph 2, large companies as referred to under paragraph 1 shall take efforts to mitigate those vulnerabilities, including by diversifying its raw materials supply chains, considering secondary raw materials, or substituting the strategic raw materials.;

Amendment

4. If significant vulnerabilities to supply disruptions are detected as a result of the risk assessment referred to in paragraph 2, ***including conflict, environmental hazards and disruptions to supply chains caused by civil unrest***, large companies as referred to under paragraph 1 shall take efforts to mitigate those vulnerabilities, including by diversifying its raw materials supply chains, considering secondary raw materials, or substituting the strategic raw materials. ***Where appropriate, mitigation measures shall be based on meaningful stakeholders engagement including with local communities, indigenous peoples and civil society organisations (CSOs).***

Or. en

Amendment 6
Marit Maij

Compromise Amendment replacing Amendment(s): 8, 9, 43, 44, 45 and 42.

Proposal for a regulation

Article 1 – paragraph 1 – point 2 – point f

Regulation (EU) 2024/1252

Article 24 – paragraph 5a and paragraph 5b – subparagraph 2

Text proposed by the Commission

5a. The Commission may request large companies referred to in paragraph 1 to explain how they comply with the

Amendment

5a. The Commission, ***taking into consideration European Parliament resolutions***, may request large companies

obligations set out in this Article. They shall provide that information no later than 30 days after receiving the request from the Commission.’

Article 24 – paragraph 5b – subparagraph 2

The Commission shall base such risk mitigation measures on an assessment of ***the available information on*** supply risks, the trade flows between the Union and third countries, and the potential obstacles to trade in critical raw materials and shall specify the maximum shares of reliance on a single third country in the supply chain of critical raw materials.’;

referred to in paragraph 1 to explain how they comply with the obligations set out in this Article. They shall provide that information no later than 30 days after receiving the request from the Commission.’

Article 24 – paragraph 5b – subparagraph 2

The Commission shall base such risk mitigation measures ***where appropriate on meaningful stakeholders engagement including with local communities, indigenous peoples and CSOs and on a conflict-sensitive*** assessment of supply risks, trade flows, between the Union and third countries, and the potential obstacles to trade in critical raw materials, and shall specify the maximum shares of reliance on a single third country in the supply chain of critical raw materials; ***the measures shall also display the potential benefits of strategic partnerships, relevant cooperation agreements, including bilateral agreements, and Global Gateway investment projects relating to critical raw materials in partner countries; as well as information on the respect for internationally recognised environmental, social and governance standards.***’;

Or. en