

## **Critical raw materials (CRM) - Products, components and waste streams with a high potential to recover critical raw materials**

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EUREFAS, the European Refurbishment Association, welcomes the Commission's initiative and strongly supports the objectives of the "Critical Raw material Act" Regulation 2024/1252. EUREFAS particularly endorses the recognition of the materials listed in Annex I as having high strategic potential in contributing to the EU's critical raw material (hereafter "CRM") policies as outlined in Article 1 of the Regulation.

As the association representing the refurbishment sector and being a key player in the circular economy by extending devices' lifespan containing a majority of the materials listed in Annex I, **EUREFAS would like to underline the importance of prioritizing reuse over recycling. To this day, reuse stands as the most effective and resource-efficient method to valorize those materials** : While recycling aims to recover CRM from end-of-life products and waste streams, **reuse already retains these materials in functional or reusable devices**, avoiding the energy-intensive and resource-consuming process of extraction through recycling. In addition, through reuse, such as refurbishment, every device resold into the market reduces the need to manufacture a new product, thereby mitigating the demand for new raw material extraction and further recovery processes.

Refurbishment, which consists of testing, the maintenance or the repair of a second-hand device by a professional, plays a key role in reducing the demand for CRM and is therefore not a competitor to recycling but its logical precursor.

A recycling-first approach that sidelines or deprioritizes reuse risks undermining the overall objectives of the CRM Act. CRM policies must recognize the upstream value of used products and components already in circulation to prevent the premature dismantling of reusable devices leading to unnecessary loss of critical raw materials. Before valorizing materials through extraction, **EUREFAS calls for the valorization of the product as a whole** through the following measures :

- **Improve collection objectives and specific targets for reuse**, distinguishing reuse from recycling in reporting obligations.
- **Mandate sorting and prioritization for reuse** in collection schemes, ensuring that every device suitable for reuse does not automatically end in recycling streams.
- **Support the development and promotion of buy-back programs**, enabling the retrieval of high-value devices and components suitable for reuse.

These measures will strengthen the refurbishment sector's capacity to retain CRM by collecting and refurbishing more devices, extending their lifespan and consequently reducing waste generation and ultimately contributing to enhancing supply security.

An effective CRM policy should thus be **complementary to European and national policies promoting reuse first**, followed by component salvaging and recycling only when reuse is no longer viable.

EUREFAS therefore encourages the Commission to recognize the role of reuse within CRM policymaking and to ensure that regulatory frameworks prioritize reuse.