



2025/2071

17.10.2025

COMMISSION IMPLEMENTING DECISION (EU) 2025/2071

of 16 October 2025

on the recognition of equivalence under Article 8(3) of Regulation (EU) 2017/821 of the European Parliament and of the Council of the supply chain due diligence scheme ‘Responsible Minerals Assurance Process’ owned by the Responsible Minerals Initiative

THE EUROPEAN COMMISSION,

Having regard to the Treaty on the Functioning of the European Union,

Having regard to Regulation (EU) 2017/821 of the European Parliament and of the Council of 17 May 2017 laying down supply chain due diligence obligations for Union importers of tin, tantalum and tungsten, their ores, and gold originating from conflict-affected and high-risk areas ⁽¹⁾ (hereinafter ‘the Regulation’), and in particular Article 8(3) thereof,

Having regard to Commission Delegated Regulation (EU) 2019/429 of 11 January 2019 supplementing Regulation (EU) 2017/821 of the European Parliament and of the Council as regards the methodology and criteria for the assessment and recognition of supply chain due diligence schemes concerning tin, tantalum, tungsten and gold ⁽²⁾ (hereinafter ‘the Delegated Regulation’), and in particular Article 9(1) thereof,

After consulting the Committee on responsible sourcing of tin, tantalum, tungsten and gold,

Whereas:

- (1) The Regulation is designed to provide transparency and certainty as regards the supply practices of Union importers, and of smelters and refiners sourcing from conflict-affected and high-risk areas.
- (2) Article 8(1) of the Regulation provides that governments, industry associations and groupings of interested organisations having due diligence schemes in place (‘scheme owners’) may submit an application to the Commission to have the supply chain due diligence schemes that they have developed and oversee recognised by the Commission.
- (3) The Delegated Regulation sets out the methodology and criteria to be applied by the Commission for the assessment and recognition of supply chain due diligence schemes for which applications for recognition are submitted to the Commission.
- (4) Article 8(3) of the Regulation provides that, where the Commission determines that a supply chain due diligence scheme, when effectively implemented by a Union importer of minerals or metals, enables that importer to comply with this Regulation, it shall adopt an implementing Decision granting that scheme a recognition of equivalence with the requirements of the Regulation. The OECD secretariat shall, as appropriate, be consulted prior to the adoption of such implementing acts. The implementing act shall be adopted in accordance with the advisory procedure referred to in Article 15(2) of the Regulation.
- (5) As per recital 14 of the Regulation, such recognition is without prejudice to the Union importers’ individual responsibility to comply with the due diligence obligations set out in Articles 4 to 7 of the Regulation. The due diligence obligations notably include an obligation to have documented information on the countries of origin of the minerals in Union importers’ supply chain. Accordingly, it is recalled that participation in a recognised scheme does not remove such individual responsibility.
- (6) On 21 June 2019, the Responsible Minerals Initiative (RMI) submitted an application to the Commission, requesting to have its due diligence scheme ‘Responsible Minerals Assurance Process’ (RMAP) recognised.

⁽¹⁾ OJ L 130, 19.5.2017, p. 1, ELI: <http://data.europa.eu/eli/reg/2017/821/oj>.

⁽²⁾ OJ L 75, 19.3.2019, p. 59, ELI: http://data.europa.eu/eli/reg_del/2019/429/oj.

- (7) The Commission assessed the application based on the admissibility requirements set out in Article 3(2) of the Delegated Regulation and decided that the application was admissible on 6 August 2019 (Commission Decision C(2019) 5828 final).
- (8) The Commission proceeded to assess the application in accordance with the methodology and criteria of the Regulation and the Delegated Regulation, using the OECD Methodology for the Alignment Assessment of Industry Programmes (hereinafter 'OECD Methodology'), as provided for in Article 4(2) of the Delegated Regulation. On 26 January 2022, the RMI was informed that RMAP did not fulfil all the required criteria and that further improvements were necessary before the Commission could consider granting recognition of equivalence.
- (9) On 10 May 2022, the RMI submitted a repeat application pursuant to Article 10(2) of the Delegated Regulation, for the recognition of the RMAP scheme under the Regulation. The Commission assessed the admissibility of the repeat application based on the requirements set out in Article 3(2) of the Delegated Regulation and decided that the application was admissible on 14 July 2022 (Commission Decision C(2022) 4880 final).
- (10) The Commission proceeded to reassess the application in accordance with the methodology and criteria of the Regulation and the Delegated Regulation.
- (11) Article 8(3) of the Regulation requires the Commission, when making a determination on the recognition of a due diligence scheme, to take into account the diverse industry practices covered by that scheme. The RMAP assesses management systems and sourcing practices at the level of smelters and refiners, and validates their conformance with the RMAP Tin and Tantalum Standard, the RMAP Tungsten Standard and the RMAP Gold Standard, all three effective as of 1 June 2018. Therefore, the scheme is effectively implemented only by certain upstream economic operators, i.e. smelters and refiners. The RMAP standard is not implemented by downstream economic operators, such as Union importers of metals. This Decision therefore only concerns smelters and refiners which are Union importers of minerals, since only those are within the scope of the scheme. It does not impact the obligations of Union importers of metals in the meaning of the Regulation, including their management system obligations, risk management obligations, third-party audit obligations and disclosure obligations as set out in Articles 4 to 7 of the Regulation.
- (12) Article 8(3) of the Regulation further stipulates that the Commission shall have regard to the risk-based approach and method used by the due diligence scheme to identify conflict-affected and high-risk areas, and the listed results thereof. The Commission has assessed the RMAP as 'fully aligned' with all criteria of the OECD Alignment Assessment Methodology that relate to risk-based due diligence. RMAP smelters and refiners are required to develop and apply their own methodology for identifying conflict-affected and high-risk areas, the effectiveness of which is evaluated as part of the third-party audits. The RMI does not provide its own list of conflict-affected and high-risk areas, but refers to the list of conflict-affected and high-risk areas provided under Regulation (EU) 2017/821 and other relevant legislations.
- (13) In accordance with Article 8(1) of the Delegated Regulation, the Commission prepared a report setting out its assessment of whether the scheme meets the general conditions for recognition and the applicable specific criteria. In its report, the Commission concludes that the general conditions for recognition of equivalence are fulfilled based on the assessment methodology set out in the Delegated Regulation.
- (14) The Commission communicated its draft report to the RMI on 27 March 2023 and granted the RMI 15 calendar days to comment on the report pursuant to Article 8(2) of the Delegated Regulation. The RMI provided a positive reply within that timeframe.
- (15) The Commission consulted the OECD Secretariat on its draft report in accordance with Article 8(3) of the Delegated Regulation. The OECD Secretariat provided its written opinion on the Commission's assessment on 23 June 2023. The OECD Secretariat concluded that the assessment and methodology used in conducting the RMAP assessment, including both the general conditions for recognition and the applicable specific criteria, were consistent with the OECD Methodology.

(16) The final report is available as a Commission Staff Working Document (SWD(2025) 297),

HAS ADOPTED THIS DECISION:

Article 1

The supply chain due diligence scheme 'Responsible Minerals Assurance Process' (RMAP) owned by the 'Responsible Minerals Initiative' (RMI) is hereby granted recognition of equivalence with the requirements of the Regulation for Union importers of minerals effectively implementing RMAP.

Article 2

Pursuant to Article 8(8) of the Regulation, upon the entry into force of this Decision, the supply chain due diligence scheme 'Responsible Minerals Assurance Process' (RMAP) shall be added to the register of recognised supply chain due diligence schemes.

Article 3

This Decision shall enter into force on the day following that of its publication in the *Official Journal of the European Union*.

Done at Brussels, 16 October 2025.

For the Commission
The President
Ursula VON DER LEYEN