



2025/2194

29.10.2025

COMMISSION IMPLEMENTING REGULATION (EU) 2025/2194

of 28 October 2025

establishing a single template to be used by project promoters for the application for recognition of a critical raw material project as a Strategic Project in accordance with Regulation (EU) 2024/1252 of the European Parliament and of the Council

(Text with EEA relevance)

THE EUROPEAN COMMISSION,

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

Having regard to Regulation (EU) 2024/1252 of the European Parliament and of the Council of 11 April 2024 establishing a framework for ensuring a secure and sustainable supply of critical raw materials and amending Regulations (EU) No 168/2013, (EU) No 2018/858, (EU) 2018/1724 and (EU) 2019/1020 ⁽¹⁾, and in particular Article 7(2) thereof,

After consulting the Committee established by Article 39(1) of Regulation (EU) 2024/1252,

Whereas:

- (1) Regulation (EU) 2024/1252, and in particular Articles 6 and 7 thereof, lay out criteria for the recognition and the application for recognition of a critical raw material project as a Strategic Project.
- (2) In accordance with Article 7(2) of Regulation (EU) 2024/1252, a single template is to be used by project promoters for the application for recognition of a critical raw material project as a Strategic Project.
- (3) The single template should require project promoters to provide the Commission with all information necessary to assess an application for the recognition of a critical raw material project as a Strategic Project on the basis of the criteria laid down in Article 7(1) of Regulation (EU) 2024/1252.
- (4) In order to harmonise the application process, the template set out in Annex I to this Regulation is a visual representation of the information to be provided by the project promoters and specifies the level of detail of that information. The information is to be submitted in electronic form.

HAS ADOPTED THIS REGULATION:

Article 1

For the application for recognition of a critical raw material project as a Strategic Project referred to in Article 7 of Regulation (EU) 2024/1252, the project promoters shall use the single template set out in the Annex to this Regulation.

⁽¹⁾ OJ L 1252, 3.5.2024, p. 1, ELI: <http://data.europa.eu/eli/reg/2024/1252/oj>.

Article 2

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

It shall apply from 18 November 2025.

This Regulation shall be binding in its entirety and directly applicable in all Member States.

Done at Brussels, 28 October 2025.

For the Commission
The President
Ursula VON DER LEYEN

ANNEX

The single template referred to in Article 7(2) of Regulation (EU) 2024/1252

The project of this application addresses one or more of the strategic raw materials listed in Annex I of Regulation (EU) 2024/1252:

☐ Yes

☐ No

SECTION 1: Basic project information

Project name		Project type and description	

Project development stage and description

Project lifetime (years)		Starting date of production		Estimated full capacity date	

Country	City	Latitude (WGS84)	Longitude (WGS84)

Webpage of the project

Provide a short summary of the project.

UNFC Classification in accordance with Article 7(1), point (b), of Regulation (EU) 2024/1252

Full UNFC classification	E-axis	F-axis	G-axis

SECTION 2: Information needed for assessing if the criteria listed in Article 6(1) of Regulation (EU) 2024/1252 are met

(1) Contribution to the Union security of supply

(a) Strategic raw materials information

Name of strategic raw material(s)

Describe how your project contributes to the Union security of supply for strategic raw material(s) and to the benchmarks provided for in Regulation (EU) 2024/1252.

For extraction projects only:

Name and chemical formula of the extracted raw material

Estimated annual production of extracted raw material (tonnes)	Strategic raw material content in weight (tonnes)

Describe the method(s) used to assess the purity of the concentrate, the resource classification and level of confidence in the resource estimates.

For processing and recycling projects only:

Name of input raw material

Annual material feed input (tonnes)	Strategic raw material content in weight (tonnes)

Name and chemical formula of produced strategic raw material

Annual production (tonnes)	Strategic raw material content in weight (tonnes)

Describe for each production step the material inputs, and the methods used to assess the strategic raw material content.

For substitution projects only:

Name of the new material	Name of the strategic raw material to be substituted
Amount of strategic raw material substituted (tonnes)	Annual production of the new material (tonnes)

Describe the innovation potential of the project.

- (b) Information on the project promoter and ownership structure

Name of the project promoter			
Country of the headquarter of the project promoter		Address of the project promoter	
Website of the project promoter			
Project contact person			
Full name	Position	Email address	
Stock symbol of the project promoter		European Participant Identification Code (PIC), if applicable	
Relative ownership share of the project promoter			
Describe the roles and rights of the project promoter involved in the project.			
Please provide the following information about the parent or holding company, in case the project promoter is a subsidiary.			
Name	Country of the headquarter	Email address	Website
Please provide the following information about any additional undertakings relevant to your project.			
Name of the undertaking	Country of the headquarter of the undertaking	Email address	Website
Please provide the following information about any additional persons relevant to your project.			
Full name of the person	Position within the undertaking	Citizenship	Country of residence

Provide information on the legal control of the project promoter and ownership structure of the project. Describe the roles and rights of each undertaking or person.

(c) Business plan

Provide a business plan required in accordance with Article 7(1), point (f), of Regulation (EU) 2024/1252 as an additional document and summarise it including the project value proposition, company strategy, approach to commercialisation, market analysis including target markets, key customers, and main competitors.

Overall foreseen Capital Expenditures (CAPEX)	Overall foreseen Operational Expenditures (OPEX)

Summarise the project's financing including a type of financing needs and foreseen CAPEX and OPEX at different project development stages in the short and long-term.

Summarise the key risks related to the business plan (including market, credit and liquidity risks).

Describe the mitigation measures put in place to address the key risks.

(d) Security of Union supply and trade

For all projects:

Summarise the strategy for securing the off-takers for the produced strategic raw materials in particular in the Union. Please specify which amount of the produced strategic raw material is foreseen for the Union market.

Provide basic information (name, ownership and headquarters location and information on the level of commitments, the amounts involved, and the time period covered) on any secured or foreseen off-take agreements and describe the general interest of off-takers in the project.

For processing, recycling and substitution projects:

Summarise the strategy for sourcing of raw materials, including the origin of raw materials used

Provide basic information on the raw materials suppliers, including ownership and headquarter location and information on the level of commitments, the amounts involved, and the time period covered.

For projects in third countries or Overseas Countries and Territories (OCTs):

Identify any potential bottlenecks you may encounter regarding trade and investment conditions e.g. export restrictions.

(2) Technical feasibility

(a) Feasibility and risks

Describe the project's technical feasibility.

Summarise the risks related to accessing the necessary technology (for example trade restrictions) and intellectual property rights related to the technology used.

Summarise the status and potential needs of infrastructure support (electricity and water access, roads, railways, harbour access).

(b) Operational status

Summarise the operational planning for the development of the project (timetable) and the key milestones including construction and roll-out.

Identify the key operational risks affecting the project and describe risk mitigation measures. Include risks associated with project design, permitting, construction, operation, and decommissioning.

Describe the level of confidence in delivering the expected project outputs within its operational environment.

(c) Permit overview

Summarise the permit-granting status of your project.

List the acquired permits and permits applied for

Permit name	Permit description	Permit status (acquired or applied for)	Date of acquisition or application

List the required permits for start of operation which have not yet been applied for:

Permit name	Permit description	Planned date of application

(3) Sustainability

Describe the adherence to any international certification scheme or relevant standard.

(a) Environmental aspects

Please summarise for each of the environmental categories below how the monitoring, prevention and minimisation of environmental impacts is (planned to be) carried out as relevant ⁽¹⁾ ⁽²⁾

Air, including air pollution such as greenhouse gas emissions	
Water, including seabed and marine environment, and water pollution, water use, water quantities (flooding or droughts) and access to water	
Soil, including soil pollution, soil erosion, land use and land degradation	

⁽¹⁾ For projects located in the Union: To demonstrate compliance with relevant Union or national law, provide a summary document and relevant extracts of an Environmental Impact Assessment report, a Strategic Environmental Assessment report or a similar environmental impact assessment report as additional document, if available.

⁽²⁾ For projects located in third countries or OCTs: To demonstrate compliance with the applicable national law where that national law provides sufficient assurance of compliance with the criterion or aspect of it and with the international instruments listed in Annex III point 5 to Regulation (EU) 2024/1252, provide a summary document and relevant extracts of an Environmental Impact Assessment report, a Strategic Environmental Assessment report or a similar environmental impact report, if available.

Biodiversity, including damage to habitats, wildlife, flora and ecosystems, including ecosystem services	
Hazardous substances	
Noise and vibration (e.g., of equipment and machinery)	
Plant safety	
Energy use and sources (e.g. renewables)	
Waste and residues (e.g., extractive waste, waste facilities, tailings management)	
Other	

Please indicate whether your project is located in areas protected pursuant to Council Directive 92/43/EEC ⁽³⁾ or Directive 2009/147/EC of the European Parliament and of the Council ⁽⁴⁾ (Natura 2000).

Yes	No
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Specifically, for processing and recycling projects located in areas protected pursuant to Directive 92/43/EEC or Directive 2009/147/EC (Natura 2000):

Please describe the technically appropriate alternative locations assessed and why those alternative locations are not considered to be appropriate locations for the project in accordance with Article 7(1), point (i), of Regulation (EU) 2024/1252.

Specifically, for projects in third countries or OCTs involving extraction:

Please provide and summarise a plan to improve the environmental state of the affected sites after the end of exploitation, with a view to restoring the prior environmental state while taking into account technical and economic feasibility in accordance with Article 7(1), point (h), of Regulation (EU) 2024/1252.

(b) Social aspects

Summarise how socially adverse impacts are prevented and minimised using socially responsible practices including respect for human rights, indigenous peoples and labour rights, in particular in the case of involuntary resettlement.

⁽³⁾ Council Directive 92/43/EEC of 21 May 1992 on the conservation of natural habitats and of wild fauna and flora (OJ L 206, 22.7.1992, p. 7, ELI: <http://data.europa.eu/eli/dir/1992/43/oj>).

⁽⁴⁾ Directive 2009/147/EC of the European Parliament and of the Council of 30 November 2009 on the conservation of wild birds (OJ L 20, 26.1.2010, p. 7, ELI: <http://data.europa.eu/eli/dir/2009/147/oj>).

Please provide and summarise the plan containing measures to facilitate public acceptance including, where appropriate, measures to facilitate the meaningful involvement and active participation of affected communities, the establishment of recurrent communication channels with local communities, organisations, including social partners, and relevant authorities, and the implementation of awareness-raising and information campaigns and potential mitigation and compensation mechanisms in accordance with Article 7(1), point (d), of Regulation (EU) 2024/1252.

Provide an estimate of the project's potential for quality job creation and the project's needs in terms of skilled workforce and a work plan to support upskilling and reskilling and promote inclusive representation of the workforce in accordance with Article 7(1), point (g), of Regulation (EU) 2024/1252.

For projects with the potential of affecting indigenous peoples:

Please provide and summarise a plan containing measures dedicated to a meaningful consultation of the affected indigenous peoples about the prevention and minimisation of the adverse impacts on indigenous rights and, where appropriate, fair compensation for those peoples, as well as measures to address the outcomes of the consultation in accordance with Article 7(1), point (j), of Regulation (EU) 2024/1252.

(c) Governance-related aspects

Summarise how transparent business practices with adequate compliance policies are used in the project to prevent and minimise adverse impacts on the functioning of public administration including anti-bribery and anti-corruption measures.

(4) Cross-border benefits / mutual benefits for the Union and third countries

For Union projects:

Describe if undertakings from different Member States participate in the project.

Describe if potential off-takers are also located in more than one Member State.

Describe the effects on the availability of strategic raw materials for downstream users in more than one Member State.

Describe if there are other cross-border benefits beyond the Member State involved, including for downstream sectors.

For projects in third countries that are emerging markets or developing economies:

Describe how the project would strengthen more than one stage of the raw materials value chain in the relevant third country or its wider region.

Describe how the project would foster private investment in the domestic raw materials value chain in the relevant third country.

Describe how the project would contribute to the creation of wider economic or social benefits, including the creation of employment.

Describe if there are other mutual benefits for the Union and the third country concerned by adding value in that third country.

SECTION 3: Supporting documents, additional information and attestation

Please provide the following supporting documents in relation to the statements in Section 2, if available.

Document(s)	Type of project	Subsection within Section 2
Third-party documentation on the method(s) used to assess the purity of the concentrate, the resource classification and level of confidence in the resource estimates.	Extraction projects only	(1)(a)
Documentation on the material inputs and the methods used to assess the strategic raw material content for each production step.	Processing and recycling projects only	(1)(a)
Documentation on the innovation potential of the project.	Substitution projects only	(1)(a)
A diagram on the legal control of the project promoter and ownership structure of the project with the roles and rights of each undertaking.	All projects	(1)(b)
Business plan evaluating the financial viability in accordance with Article 7(1), point (f), of Regulation (EU) 2024/1252.	All projects	(1)(c)
Financially independent third-party due diligence report on the key risks related to the business plan (including market, credit and liquidity risks).	All projects	(1)(c)

Available studies on the project's technological maturity.	All projects	(2)(a)
Any additional relevant documentation with regard to the operational status of the project.	All projects	(2)(b)
Documentation on the adherence to any international certification scheme or relevant standard.	All projects	(3)
Description of technically appropriate alternative locations assessed and why those alternative locations are not considered to be appropriate locations for the project in accordance with Article 7(1), point (i), of Regulation (EU) 2024/1252.	Processing and recycling projects located in areas protected pursuant to Directive 92/43/EEC or Directive 2009/147/EC (Natura 2000)	(3)(a)
A plan to improve the environmental state of the affected sites after the end of exploitation, with a view to restoring the prior environmental state while taking into account technical and economic feasibility in accordance with Article 7(1), point (h), of Regulation (EU) 2024/1252.	Projects in third countries or OCTs involving extraction	(3)(a)
Relevant extracts or summary documents of Environmental Impact Assessment, Strategic Environmental Assessment or similar environmental impact assessment reports relevant for the monitoring, prevention and minimisation of environmental impacts.	All projects	(3)(a)
A plan containing measures to facilitate public acceptance including, where appropriate, measures to facilitate the meaningful involvement and active participation of affected communities, the establishment of recurrent communication channels with local communities, organisations, including social partners, and relevant authorities, and the implementation of awareness-raising and information campaigns and potential mitigation and compensation mechanisms in accordance with Article 7(1), point (d), of Regulation (EU) 2024/1252.	All projects	(3)(b)
A plan containing measures dedicated to a meaningful consultation of the affected indigenous peoples about the prevention and minimisation of the adverse impacts on indigenous rights and, where appropriate, fair compensation for those peoples, as well as measures to address the outcomes of the consultation in accordance with Article 7(1), point (j), of Regulation (EU) 2024/1252.	Projects with the potential of affecting indigenous peoples	(3)(b)
Any additional relevant documentation with regard to the sustainability of the project.	All projects	(3)

Provide any other relevant comments or information on the project of the application not provided above, for example regarding previously received funding by the EU.

The project promoter represented by the person named in the following table confirms that to the best of their knowledge and belief, the information provided in this application is true, factually correct, and complete, that the documents required by this application have been supplied and are authentic and complete, that all estimates provided are identified as such and are the best estimates of the underlying facts, and that all opinions expressed are impartial and sincere:

Full name	Email	Date