Strategic Projects
under the Critical Raw Materials Act

Individual Assessment Report (IAR)

Version 1.1

15/01/2025

This template for the Individual Assessment Report (IAR) has been designed to support the experts in the **assessment of applications** submitted to the call for Strategic Projects under the Critical Raw Materials Act (CRMA). It should be completed individually by each expert who has been assigned to assess applications. The draft IAR must comply with the quality standards as defined during the expert briefing.

As an expert you are asked to subsequently perform the following three steps:

1) Provide the basic information about the project as well as your name and expert ID on page 3.
2) Answer the questions, which are structured according to the sections of the application form (with Criterion 1 corresponding to Section 2 of the application form, etc.) and the five assessment criteria as defined in Article 6 of the CRMA as follows:
   i. First, answer a number of questions about the information provided in the application form.
   ii. Second, provide a summary to what extent the project fulfils the assessment criterion by referring to your answers to the individual questions in the first part. The aim of this summary is to give a clear assessment of the application based on its merit, with justification. It should also provide clear feedback on the application's weaknesses and strengths, be of an adequate length, and in an appropriate tone
   iii. Third, provide your assessment of whether the application meets the respective criteria by checking the relevant box. Please use the following definitions for your assessment:
      - **The project meets this criterion:**
        - **fully:** The application successfully addresses all relevant aspects of the criterion. Any shortcomings are minor, i.e., relate only to a marginal aspect of the application with respect to the criterion and/or can easily be rectified.
        - **to a large extent:** The application addresses the criterion well, but a small number of shortcomings are present, which relate to specific aspects of the application that can still be rectified. It does not render the application inappropriate for selection as Strategic Project, i.e. the application is still considered to meet the relevant criterion overall despite its shortcomings.
      - **The project partially meets this criterion:** The application broadly addresses the criterion, but there are significant weaknesses, which means that the application addresses the criterion in a limited and/or not sufficiently effective way. This can also be the case when the application includes a large number of shortcomings, each one of them individually not rendering the application inappropriate for selection as a Strategic Project. However, altogether the shortcomings lead to the application not addressing the criterion sufficiently at this development stage.
      - **The project does not meet this criterion:** The criterion is inadequately addressed, or there are serious inherent weaknesses.

3) Send the completed IAR to the Commission **using EU Send WEB**.

Further details about the use of this template are provided during the expert briefing that the Commission organises before the start of the assessment process.

HISTORY OF CHANGES		
Version	**Publication date**	**Changes**
1.0	08/10/2024	Initial version
1.1	15/01/2026	Updated version for the second cut-off, reflecting changes in the application form and including improvements based on lessons learned from the first assessment round.

PROJECT – Basic Information	
Project Name:	
Project Promoter:	
Project Type:	
Project Country:	
Application ID:	

Expert	
Expert Name:	
Expert ID:	

Criterion 1: Contribution to EU supply security

a) Based on all the project information provided, is the project defined correctly in terms of type (e.g. extraction, processing, recycling & substitution), development stage, location, raw materials?

[add your answer here]

b) Are there any elements in the ownership structure or in the control[1] of the involved undertakings that might jeopardise the security of the EU's supply of SRMs, such as:
   - Legal control of the project promoter by an entity based outside the EU and partnership countries?

[add your answer here]

   - Legal control of the holding or parent company of a project promoter by an entity based outside the EU and partnership countries?

[add your answer here]

   - Additional undertakings or persons relevant to the project that could be cause for concern?

[add your answer here]

c) Is the project value proposition (including company strategy, approach to commercialisation, market analysis including target markets, key customers, and main competitors) competitive?

[add your answer here]

Are the foreseen capital expenditure (CAPEX) and operational expenditure (OPEX) at different project development stages in the short- and long-term, including if available the discounted OPEX, sufficient and reasonable for a project of this kind? In case such information is provided: Is the project's net present value positive and is the internal rate of return sufficient?

[add your answer here]

Is the financing structure appropriate for a project of this kind (e.g. amount, expected share and source of equity financing, guarantees and loans)? Are the required sources of financing already in place or reasonably foreseen? Are there any potential financing gaps? If yes, are they resolvable through the intended actions?

[add your answer here]

Have the key risks related to the business plan (e.g. market demand, pricing, access to financing options such as credit, liquidity, raw material costs, etc.) which could impact the

[1] In this context, control means rights, contracts or other means that give the holder of them the possibility of exercising decisive influence on an undertaking. This can be the right to use all or part of an undertaking's assets; as well as rights or contracts which allow decisive influence on the composition, voting or decisions of the organs of an undertaking. Where possible, this should also include basic information on the ultimate owner of the undertaking.

financial viability of the project been correctly identified? Are the mitigation measures to address these risks appropriate?

[add your answer here]

If available, do the financial due diligence reports produced by independent parties give assurance on the financial viability of the project? If yes, under which main conditions?

[add your answer here]

d) Are sufficient off-take agreements in place already, with identified off-takers and details on their level of commitment, amounts involved, and time period covered? If not, is the strategy for securing the off-takers for the produced SRM appropriate and likely to be successful?

[add your answer here]

What share of produced SRM is designated for off-takers in the EU?

[add your answer here]

For processing and recycling projects, is the strategy for sourcing SRM appropriate? Are the raw materials suppliers appropriately identified and relevant for the success of the project, including their level of commitment, amounts involved, and time period covered?

[add your answer here]

Are the input or outputs of the project subject to ongoing or announced export restrictions or any other trade and investment-related bottlenecks? Do such potential bottlenecks pose a significant risk to the sales of the project given the off-take agreements in place or foreseen?

[add your answer here]

For extraction, processing, and recycling projects, how much does the project contribute to maintaining or strengthening EU capacities as a share of the EU's annual consumption of strategic raw material, taking into account the project's estimate production, share of production designated for EU off-takers, the expected increase in EU consumption, and the relevant 2030 benchmarks provided for in Regulation (EU) 2024/1252?[2]

[add your answer here]

For substitution projects, how does the project contribute to strengthening EU capacity to produce innovative raw materials able to substitute SRM in one or more strategic technologies? Is the environmental footprint equal or lower than that of the strategic raw material that is being substituted?

[add your answer here]

[2] Relevant studies on expected consumption in 2030 with an EU-scope, such as the supply chain analysis and material demand forecast in strategic technologies and sectors in the EU, can be used if applicable.

Assessment: Would the project make a meaningful contribution to the security of the EU's supply of strategic raw materials?

For EU Projects:

Please take in your assessment into account:

i. *whether the project contributes towards the 2030 benchmarks for extraction, processing and recycling set out in Article 5(1), point (a) of the Critical Raw Materials Act;*

ii. *whether the project contributes to maintaining or strengthening EU capacities as a share of the EU's annual consumption of strategic raw material, taking into account the expected increase in EU consumption;*

iii. *whether the project contributes to strengthening EU capacity to produce innovative raw materials able to substitute strategic raw material in one or more strategic technologies, while taking measures to achieve an equal or lower environmental footprint compared to the strategic raw material that is substituted.*

A project's contribution to the relevant capacity benchmark shall be assessed taking into account the project's business plan and supporting technical information included in the application and the project's estimated time to market.

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

Please take in your assessment into account:

i. *whether the project contributes to the 2030 benchmark for diversification set out in Article 5(1), point (b) of the Critical Raw Materials Act or contributes to maintaining the resilience of the EU's supply of strategic raw materials;*

ii. *whether the applicable legal framework or other conditions provide assurance that trade and investment related to the project will not be distorted, taking into account, in particular, whether the EU has concluded a Strategic Partnership or a trade agreement containing a chapter on raw materials with the relevant third country, or OCTs, and is consistent with the EU's common commercial policy;*

iii. *the extent to which there are undertakings that have or are willing to conclude offtake agreements with the project promoter with a view to using or processing the strategic raw materials produced by the relevant projects in the EU;*

iv. *whether the project is in line with the EU's development cooperation and foreign policy objectives.*

A project's contribution to the 2030 benchmark for diversification shall be assessed taking into account the project's business plan and supporting technical information included in the application, the project's estimated time to market as well as the share of the project's output that is covered by existing or potential offtake agreements referred to in point (c). Evidence related to point (c) may include contractual agreements, letters of intent or memoranda of understanding.

Please provide a summary to what extent the project fulfils the assessment criterion by referring to your answers to the individual questions a-d:

[add your summary here]

In your opinion, does the project fulfil this assessment criterion?

☐ The project fully meets this criterion.

☐ The project meets this criterion to a large extent.

☐ The project partially meets this criterion.

☐ The project does not meet this criterion.

☐ I am not able to assess if the project meets this criterion.

Criterion 2: Technical feasibility

a) Have the potential technical issues that could arise while pursuing the project been correctly identified?

[add your answer here]

Has the technology intended to be used already been demonstrated in the relevant environment (Technology Readiness Level 6)?

[add your answer here]

Have the risks related to accessing the necessary technology (e.g. trade restrictions) and intellectual property rights related to the used technology been correctly identified?

[add your answer here]

Is the existing and planned infrastructure (electricity and water access, roads, railways, harbour access) sufficient for supporting the foreseen production and commercialisation of the SRM?

[add your answer here]

b) How realistic and feasible (e.g. on a scale of 0 – 100%) are the operational planning for the development of the project (timetable) and the key milestones including construction and roll out?

[add your answer here]

Have the key operational risks affecting the project (including risks associated with project design, permitting, construction, operation, and decommissioning) been identified correctly? Are the corresponding risk mitigation measures appropriate?

[add your answer here]

How realistic and feasible (e.g. on a scale of 0 – 100%) is achieving the stated expected project outputs (please refer to Section 2a) given its operational environment?

[add your answer here]

Does the status of the permits that have already been acquired or that still need to be acquired provide assurance for the operational feasibility of the project?

[add your answer here]

Based on the feasibility studies carried out on the potential of development of the project (if available), is the proposed project likely to become operational in line with the planning (timetable)?

[add your answer here]

Are further studies needed to confirm the feasibility of the project? If so, which additional aspects should these further studies cover?

[add your answer here]

Assessment: Is the project technically feasible, or will it become technically feasible within a reasonable timeframe?

In your assessment, please take into account:

i. the quality of the feasibility studies carried out on the potential of development of the project;
ii. whether the technology intended to be used has been demonstrated in the relevant environment.

The feasibility studies referred to in point (a) shall be designed to:

- *assess whether a proposed project is likely to be successful by analysing technological and environmental considerations;*
- *identify potential technical issues and problems that could arise while pursuing the project.*

Further studies may be required to confirm the feasibility of the project.

Please provide a summary to what extent the project fulfils the assessment criterion by referring to your answers to the individual questions a-b:

[add your summary here]

In your opinion, does the project fulfil this assessment criterion?

☐ The project fully meets this criterion.

☐ The project meets this criterion to a large extent.

☐ The project partially meets this criterion.

☐ The project does not meet this criterion.

☐ I am not able to assess if the project meets this criterion.

Criterion 3: Sustainability

Does the project adhere to any international sustainability certification scheme or relevant standard?[3] If yes, which one and is there sufficient evidence for compliance?

[add your answer here]

a) How does the project (or is the project planning to) monitor, prevent and minimise the environmental impacts? Are the proposed efforts adequate?[4] Do the EIA, SEIA or similar environmental impact assessment reports give assurance for this? Please provide an answer for each of the cases below:

- Air, including air pollution such as greenhouse gas emissions

[add your answer here]

- Water, including seabed and marine environment, and water pollution, water use, water quantities (flooding or droughts) and access to water

[add your answer here]

- Soil, including soil pollution, soil erosion, land use and land degradation

[add your answer here]

- Biodiversity, including damage to habitats, wildlife, flora and ecosystems, including ecosystem services

[add your answer here]

- Hazardous substances

[add your answer here]

- Noise and vibration (e.g. of equipment and machinery)

[add your answer here]

- Plant safety

[add your answer here]

[3] Please note that currently, there are no schemes that have been recognised pursuant to Article 30(2) of the CRMA. Therefore, there are currently no recognised schemes that could be used to attest compliance with the sustainability criterion; certification of projects by non-recognised schemes can nevertheless be taken into account as part of a holistic assessment.

[4] For projects located in the Union: To demonstrate compliance with relevant Union or national law, applicants have been asked to 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.

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, applicants have been asked to 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

- Energy use and sources (e.g. renewables)

[add your answer here]

- Waste and residues (e.g. extractive waste, waste facilities, tailings management)

[add your answer here]

- Other categories identified as relevant

[add your answer here]

For processing or recycling projects in the EU located in areas protected under the Birds or Habitats Directives,[5] has the project promoter assessed the technically appropriate alternative locations, and adequately justified why those alternative locations are not considered appropriate?

[add your answer here]

For extraction projects in third countries or OCTs, does the application include an adequate 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?

[add your answer here]

b) How are socially adverse impacts prevented and minimised through socially responsible practices including respect for human rights, indigenous peoples and labour rights (in particular in the case of involuntary resettlement)?[6] Are the measures appropriate?

[add your answer here]

How does the project engage with local/affected communities and relevant social partners? Are the measures to facilitate public acceptance appropriate?

[add your answer here]

Will the project likely create jobs (directly and indirectly) in relevant areas? Does it support upskilling and/or reskilling?

[add your answer here]

For projects with the potential to affect indigenous peoples, does the application propose adequate 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?

[5] Directive 92/43/EEC and Directive 2009/147/EC. Please note that projects located outside such protected areas may also be affected if they have a significant impact on those protected areas.

[6] Projects in third countries or OCTs should refer to the national legislation where that national law provides sufficient assurance and compliance with the sustainability criteria from the CRM Act, or to relevant international instruments listed in Annex III of the CRM Act.

[add your answer here]

c) How does the project prevent and minimise adverse impacts on the functioning of public administration? Does the project use transparent business practices with adequate compliance policies including anti-bribery and anti-corruption measures?[7]

[add your answer here]

[7] Projects in the EU should refer to the relevant EU and national legislation. Projects in third countries or OCTs should refer to the national legislation where that national law provides sufficient assurance and compliance with the sustainability criteria from the CRM Act, or to relevant international instruments listed in Annex III of the CRM Act.

Assessment: Would the project be implemented sustainably, in particular as regards:

- the monitoring, prevention and minimisation of environmental impacts;
- the prevention and minimisation of socially adverse impacts through the use of socially responsible practices including respect for human rights, indigenous peoples and labour rights, in particular in the case of involuntary resettlement, potential for quality job creation and meaningful engagement with local communities and relevant social partners; and
- the use of transparent business practices with adequate compliance policies to prevent and minimise risks of adverse impacts on the proper functioning of public administration, including corruption and bribery?

For projects in the EU:

In your assessment, please take into account an overall assessment of a project's compliance with relevant EU or national law as well as relevant supplementary evidence, taking into account the location of the project.

***For projects in third countries or in OCTs**:*

In your assessment, please take into account compliance with the applicable national law where that national law provides sufficient assurance of compliance with the criterion or aspects of it and with the following international instruments:

i. *ILO Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy;*
ii. *OECD Due Diligence Guidance for Responsible Business Conduct, in particular the guidelines related to combatting corruption;*
iii. *OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas;*
iv. *OECD Due Diligence Guidance for Meaningful Stakeholder Engagement in the Extractive Sector, including where referring to the principles set out in the United Nations Declaration on the Rights of Indigenous Peoples;*
v. *OECD Principles of Corporate Governance;*
vi. *OECD Guidelines for Multinational Enterprises on Responsible Business Conduct;*
vii. *UN Guiding Principles on Business and Human Rights;*
viii. *IFC Performance Standard 5 on Land Acquisition and Involuntary Resettlement.*

Project promoters may also attest compliance with this assessment criterion by[8]:

i. *providing evidence that the project concerned is individually certified by one or more schemes recognised pursuant to Article 30(2) of the Critical Raw Materials Act that jointly cover the requirements listed in Annex IV, point (2); or*
ii. *committing to obtain certification for the project concerned as part of by one or more schemes recognised pursuant to Article 30(2) that jointly cover the requirements listed in Annex IV, point (2), and providing sufficient evidence that when implemented the project concerned will be able to meet the criteria for such certification.*

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[8] Please note that currently, there are no schemes that have been recognised pursuant to Article 30(2) of the CRMA. Therefore, there are currently no recognised schemes that could be used to attest compliance with the sustainability criterion; certification of projects by non-recognised schemes can nevertheless be taken into account as part of a holistic assessment.

*Please provide a summary to what extent the project fulfils the assessment criterion by referring to your answers to the individual questions a-c. Discuss each of the three categories (**Environmental impacts, socially adverse impacts, transparent business practices**) of sustainability separately.*

[add your summary here]

In your opinion, does the project fulfil this assessment criterion?

☐ The project fully meets this criterion.

☐ The project meets this criterion to a large extent.

☐ The project partially meets this criterion.

☐ The project does not meet this criterion.

☐ I am not able to assess if the project meets this criterion.

Criterion 4: Cross-border Benefits (only for projects in the EU)

Are there cross-border benefits beyond the Member State concerned? Please provide an answer for each of the possible cases below:

- Participation of undertakings from different Member States in the project.

[add your answer here]

- Off-takers located in more than one Member State

[add your answer here]

- A positive effect on the availability of SRMs for downstream users in more than one Member State.

[add your answer here]

- Other cross-border benefits beyond the Member State involved, including for downstream sectors

[add your answer here]

Assessment: For projects in the EU, would the establishment, operation or production of the project have cross-border benefits beyond the Member State concerned, including for downstream sectors?

In your assessment, please take into account:

i. whether undertakings from different Member States participate in the project;
ii. whether potential off-takers are located also in more than one Member State;
iii. effects on the availability of strategic raw materials for downstream users in more than one Member State.

Please provide a summary to what extent the project fulfils the assessment criterion by referring to your answers to the individual questions above:

[add your summary here]

In your opinion, does the project fulfil this assessment criterion?

☐ The project fully meets this criterion.

☐ The project meets this criterion to a large extent.

☐ The project partially meets this criterion.

☐ The project does not meet this criterion.

☐ I am not able to assess if the project meets this criterion.

Criterion 5: Mutual benefits for EU and third countries (For projects in third countries or OCTs that are emerging markets or development economies[9])

- Does the project contribute to the strengthening of more than one stage of the raw materials value chain in that country or its wider region?

[add your answer here]

- Foster private investment in the domestic raw materials value chain of the relevant third country?

[add your answer here]

- Create wider economic or social benefits, including employment?

[add your answer here]

- Are there other mutual benefits for the Union and the third country concerned by adding value in that third country?

[add your answer here]

Assessment: For projects in third countries that are emerging markets or developing economies, would the project be mutually beneficial for the EU and the third country concerned by adding value in that third country?

In your assessment, please take into account the extent to which the project contributes, in the relevant third country:

i. to strengthening more than one stage of the raw materials value chain in that country or its wider region;
ii. to fostering private investment in the domestic raw materials value chain;
iii. to the creation of wider economic or social benefits, including the creation of employment.

Please provide a summary to what extent the project fulfils the assessment criterion by referring to your answers to the individual questions above:

[add your summary here]

In your opinion, does the project fulfil this assessment criterion?

☐ The project fully meets this criterion.

[9] For an overview of third countries that are considered as emerging markets or developing economies under this call, please consult the list of low- to middle-income countries on page 3 of list of participating countries in Horizon Europe.

☐ The project meets this criterion to a large extent.

☐ The project partially meets this criterion.

☐ The project does not meet this criterion.

☐ I am not able to assess if the project meets this criterion.