

## ***Review of the communication on important projects of common European interest (IPCEI)***

Eramet main remarks relate to the IPCEI criterias:

- Eramet believes that **securing access to raw materials should be considered as a criteria for eligibility** since it is one of strategic EU's objectives and of major importance for the success of the European Green Deal. To this end, we propose the following changes in the Commission proposal:
  - o *(15) The project must represent an important contribution to the EU's objectives, for example by being of major importance for the European Green Deal, the Digital Strategy and European Strategy for Data, the New Industrial Strategy for Europe, securing supplies of raw materials for the European industry, Next Generation EU, the new European Research Area for research and innovation, the new Circular Economy Action Plan, or the EU's objective to become climate neutral by 2050, among others.*

Our other comments address three points:

- We propose that **the minimum number of Member States necessary for the constitution of a project remain at 2**. To this end, we propose the following changes in the Commission proposal:
  - o *(17) Unless a smaller number is justified by the nature of the project, the project must involve at least ~~four~~ two four Member States.*
- We propose that **the taxonomy point only applies when the regulation becomes applicable**. To this end, we propose the following changes in the Commission proposal:
  - o *(22) In addition to the cumulative criteria set out in section 3.2.1, the Commission will adopt a more favorable approach when: the project takes into account the taxonomy regulation (footnote: as soon as the regulation in question becomes applicable).*
- **We estimate that eligible costs must be extended, particularly regarding "first industrial deployment."** Eligible costs in the context of the first industrial deployment should not be limited to R&D activities and pre-industrialization but also to volume production. CAPEX funding seems to have little incentive since it only concerns depreciation. In this sense, the rules for calculating financial aid related to depreciation must be harmonized within the EU to avoid purely accounting distortions. Moreover, we consider that eligible costs should cover OPEX when it allows to compensate an economic disadvantage.

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