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Position Paper: EU Critical Raw Materials Centre

Business & Science Poland

This position paper is submitted on behalf of Business & Science Poland (BSP) in response to the European Commission's Call for Evidence and Public Consultation on the "EU Critical Raw Materials Centre".

BSP Position

Business & Science Poland (BSP) welcomes the European Commission's efforts to strengthen the EU's resilience and preparedness by developing a strategic stockpiling framework for critical raw materials. Such a framework should be based on a **robust assessment of supply risks, market characteristics, strategic relevance, and proportionality**, ensuring that public resources are directed towards materials where **stockpiling would deliver the greatest added value for the EU's security and competitiveness**.

In this context, Business & Science Poland believes that **stockpiling decisions should reflect the specific characteristics of individual raw materials rather than apply a uniform approach**. While strategic reserves may be justified for materials facing high supply concentration, limited market liquidity, or elevated geopolitical risks, the same rationale does not necessarily apply to all critical raw materials.

Copper is a strategic raw material underpinning the EU's energy transition, economic security, risk preparedness, and strategic autonomy. It is indispensable for renewable energy technologies, electricity grids, electromobility, defence applications, and digital infrastructure. **At the same time, the EU benefits from a significant domestic production base, with Poland accounting for nearly half of all copper ore mined within the EU (excluding overseas territories).**

At present, Business & Science Poland does not see sufficient justification for including copper in the future EU strategic raw material stockpiling system. In contrast to rare earth elements and certain other critical raw materials, **the global copper market is characterised by relatively high liquidity, diversified supply sources, and a comparatively low risk of sudden supply disruptions**. The EU should therefore prioritise stockpiling efforts for raw materials facing the highest supply risks, particularly those with concentrated supply chains, limited market liquidity, or strong dependence on a single external supplier.

Moreover, **stockpiling copper at a meaningful scale would entail substantial financial, logistical, and administrative costs due to the large volumes consumed by European industry**. Resources would be more effectively allocated to developing and testing governance, financing, and operational mechanisms for stockpiling higher-risk raw materials before considering any broader expansion of the system.

Should the Commission establish a joint purchasing mechanism under the future Critical Raw Materials Centre, Business & Science Poland emphasises that the **fertiliser production sector should be treated on an equal footing with other strategic sectors identified in the RESourceEU Action Plan**. As recognised in the Plan, critical raw materials are essential not only for the clean energy and digital transitions and for defence and aerospace, but also for **food security**. This strategic role has been further confirmed by the Fertiliser Action Plan published in May 2026.

Fertiliser production depends on a complex network of critical raw materials. For example, copper-, chromium-, and nickel-based catalysts are indispensable for synthesis gas production, a key step in ammonia manufacturing, which forms the basis of nitrogen fertilisers. Similarly, phosphate fertiliser production depends on phosphate rock and sulfuric acid, the latter requiring vanadium-based catalysts. **More broadly, industrial catalysts containing critical raw materials improve the efficiency of chemical processes, thereby contributing to both industrial competitiveness and the achievement of the EU's climate objectives.**

Business & Science Poland therefore recommends that copper should not be included in the initial scope of the future Critical Raw Materials Centre's stockpiling mandate. Instead, the framework should focus on raw materials facing the greatest supply risks while ensuring that, where joint purchasing mechanisms are introduced, **sectors essential to the Union's food security, including fertiliser production, receive the same strategic consideration as other priority industries.** The case for strategic copper stockpiles could be reassessed in the future should market conditions deteriorate significantly or supply risks to the European economy materially increase.

About BSP

Business & Science Poland (BSP) is the largest Brussels-based association representing Polish companies from various sectors in discussions with EU institutions. It bridges the experience of leading Polish enterprises with the EU agenda. BSP represents the expertise and interests of Polish companies employing over 280,000 people in Poland, across the EU, and globally. The main objective of BSP is to strengthen the representation of Polish economic interests and ensure that EU legislation takes into account the specific circumstances and needs of the Polish economy.