

13 February 2026

## **Submission to the Public Consultations on Simplifying EU rules for defence and sensitive security procurement**

On behalf of the Beryllium Science & Technology Association (BeST), representing the manufacturers, suppliers and users of beryllium metal, beryllium containing alloys and beryllium oxide ceramics in the EU market, please find below our comments on the public consultations on Simplifying EU rules for defence and sensitive security procurement. Our primary concern is safeguarding the continued use of beryllium in European defence systems.

Beryllium is essential for Europe's defence readiness and technological sovereignty, yet fragmented EU regulations continue to jeopardize its availability for defence applications. While the European Commission's Defence Readiness Omnibus advances coherence by integrating defence into chemicals and materials policy, it still needs to be imbedded into defence procurement rules and practices. We therefore call the EU to:

- Recognise the irreplaceability of CRMs like beryllium in critical systems.
- Endorse the principle of regulatory coherence for beryllium, ensuring its availability.

Beryllium is indispensable for Europe's defence readiness and technological sovereignty due to:

- Its unique combination of properties: lightweight, strength, high stiffness, thermal stability, and conductivity, transparency to X-rays, neutron reflection and moderation, non-magnetic properties, enabling performance in aerospace, missile guidance, surveillance, nuclear, and advanced weapons applications that cannot be matched by alternatives.
- The European Union and NATO having recognised beryllium as a Critical Raw Material, with the U.S. DoD additionally declaring it both "critical and strategic."
- Limited existing health risks in the workplace being successfully addressed through a binding EU Occupational Exposure Limit and a comprehensive Product Stewardship Programme ("Be Responsible").

It is vital that future procurement rules ensure Europe's defence industry has the materials it needs to stay ready, resilient, and sovereign.

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### **BeST**

The Beryllium Science and Technology Association (BeST) represents the manufacturers, suppliers and users of Beryllium metal, Beryllium containing alloys and Beryllium oxide ceramics in the EU market. BeST has the objective of promoting sound policies, regulations, science and actions related to the safe use of Beryllium and to serve as an expert resource for the international community on the benefits and criticality of Beryllium applications. It is also the objective of BeST to promote good practices in the workplace to protect workers handling Beryllium containing materials.