

Position Paper on the Trio Programme

BeST

The Beryllium Science and Technology Association (BeST) represents the suppliers of beryllium metal and beryllium containing alloys in the EU market and has the objective of promoting sound policies, regulations, science and actions related to the use of beryllium and to serve as an expert resource for the international community on the benefits and criticality of beryllium applications.

Introduction

On 13 December 2021, France, the Czech Republic and Sweden published their Trio Programme for the upcoming 18 months of the Council of the European Union. The Trio has identified important objectives to achieve in several fields, including, among others, the strengthening of the single market, addressing the challenges associated with climate neutrality, enhancing trade relations and developing a comprehensive security and defence EU strategy.

Observations

BeST would like to highlight the following recommendations:

1. Single Market

The three upcoming Presidencies have committed to developing a more integrated approach to the single market by removing unjustified barriers.

Specifically, BeST supports the Trio's objectives to reduce the EU's dependencies by diversifying current and future production and supply chains as well as ensuring strategic stockpiling. BeST, however, highlights that the current development of new EU policies, i.e. the Carbon Border Adjustment Mechanisms (CBAM), could potentially constitute important trade barriers negatively impacting the EU industry.

2. Climate Neutrality

The Trio is strongly committed to implementing actions presumed to achieve climate neutrality. Specifically, the three Presidencies have announced that they will promote the transition to a toxic-free environment, enhance the circular economy and support the development of sustainable products.

Industrial innovation is key in achieving the above objectives and critical raw materials will play an important role. For example, beryllium has a key role in the recycling of lightweight magnesium-containing material for the automotive industry as well as in no-fail aircraft where copper-beryllium alloys are essential for electrical and electronic connectors enabling fly-by-wire commercial airliners to achieve fuel efficiencies. Copper-beryllium alloys are also key in the green mobility, including electric vehicles and hydrogen infrastructures. Additionally, beryllium-containing materials are more efficient and effective in many applications and therefore contribute to increasing the lifespan of products.

Similarly to beryllium, several other metals are key enablers in achieving the priorities identified. Metals are natural elements with unique and essential properties to achieve the objective of carbon neutral by 2050. Metals industry estimates that 6 times more metals will be needed to achieve the ecological and digital transition. Since 80% of metals are classified under CLP, additional regulatory constraints stemming from these classifications could have very negative impacts.

BeST highlights that current policy proposals, such as the essential use concept, stemming from the Chemicals Strategy for Sustainability (CSS) and expected to be included in cornerstone regulatory frameworks, such as REACH and CLP, could have potential severe unintended consequences on the EU industry. These consequences would put the EU industry at a competitive disadvantage compared to other regions of the world as well as potentially erode EU supply chains and therefore increase the EU's dependency on third countries.

3. Security and Defence

Rue Belliard 205 – 1000 Brussels - Belgium

T. +32.2.213 74 20 – M. +32.471 06 47 86 – info@beryllium.eu – www.beryllium.eu – www.berylliumsafety.eu
Beryllium Science & Technology Association aisbl - company reg. 0841.293.074 – EU transparency reg. 40023137761-50



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BeST welcomes the Trio's acknowledgement of the importance of the security and defence sector. Metals in general play a strategic role in the defence and security sector, including beryllium and beryllium-containing alloys used in several military and defence applications.

The current supply shortage of strategic raw materials has clearly demonstrated the importance of these materials and how guaranteeing their supply to the EU is of outmost importance.

Conclusions

Considering the above, a balanced and coordinated approach is necessary to achieve the important priorities identified. The identified priorities should be considered in the frame of a comprehensive strategy, where the horizontal impacts of the regulatory policies are adequately assessed, and the valuable input of industry is considered.

A global, comprehensive, balanced and coordinated approach is therefore fundamental to achieve the priorities identified.
