

Position Paper on the RESourceEU initiative

European Federation of Geologists (EFG)

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1. Introduction

The European Federation of Geologists (EFG) acknowledges and supports the European Union's sustained commitment to enhancing the security and sustainability of Critical Raw Materials (CRMs) through the latest legislative updates. These measures are vital for Europe's industrial strength and green transition.

However, EFG must highlight a critical oversight in the 2025 RESourceEU action plan. While the plan rightly focuses on industrial resilience, downstream supply chain obligations, and market monitoring, it fundamentally neglects the most crucial upstream component: the geological foundation upon which the entire raw materials value chain is built. The plan fails to adequately address the geological knowledge base, the exploration capacity, and, most importantly, the highly qualified geoscientific workforce required to discover, assess, and responsibly manage the resources needed to meet the EU's ambitious CRM targets. Without the direct involvement of geological experts, these targets risk remaining purely aspirational.

2. Critical Gaps in the Upstream Foundation

EFG has identified several profound weaknesses in the plan that undermine its effectiveness and compromise Europe's long-term strategic autonomy.

2.1. Unaddressed Strategic Vulnerability: The Geological Skills Shortage

EFG has previously issued warnings that the current and projected geological workforce is critically insufficient to achieve the CRMA's extraction and processing targets. The amended texts contain no concrete provisions to address this strategic vulnerability. There are no measures for skills development, harmonisation of qualifications, or professional mobility, creating a bottleneck at the very start of the value chain.

2.2. Flawed Governance Without Certified Geoscientific Expertise

The decision-making bodies and committees established under the CRMA lack a formal requirement for the inclusion of certified geological experts. This means that strategic decisions on resource policy, project evaluation, and risk assessment are being made without the necessary, grounded technical input from the professionals who understand the complexities of the subsurface and the realities of mineral exploration and extraction.

2.3. Stagnation of Essential Geological Exploration Programmes

While the CRMA initially encouraged national exploration programmes, the amendments fail to operationalise or reinforce this vital requirement. A secure supply of raw materials begins with discovery. Without robust, ongoing exploration, Europe cannot build a pipeline of viable projects, leaving it dependent on volatile international markets.

2.4. High-Risk Oversight: No Technical Standards for Geological Input

The plan strengthens risk assessment obligations for large companies but dangerously omits any requirement for geoscientific competence in performing them. Resource projects are inherently geological. Evaluating their viability, risks, and environmental impact is impossible without expert geological knowledge. This omission not only invites technical and financial failures but also compromises safety and environmental resilience.

3. Operational Recommendations from EFG

To rectify these omissions and ensure the successful, resilient, and responsible implementation of the CRMA, EFG urges the incorporation of the following measures in all future regulatory and policy updates.

3.1. Mandate Representation of Professional Geoscientists in Governance

It is imperative to require the formal representation of professional bodies, such as EFG, on the CRM Board and its associated technical expert groups. Since all upstream work—from initial exploration to resource modelling—is conducted by geologists, it is essential to align strategic decisions with the professionals operationally implementing them on the ground.

3.2. Enforce Certified Geoscientific Competence in Permitting and Risk Assessments

The added value of certified geoscientists lies in their verified competence and commitment to the highest technical and ethical standards. This expertise is crucial for de-risking projects and ensuring public trust.

- Require certified geological professionals (e.g., those holding the European Geologist (EurGeol) title) for the evaluation of all exploration, extraction, processing, and recycling projects submitted for permitting. This ensures that projects are technically sound, economically viable, and environmentally responsible.
- Mandate the involvement of certified professionals in the risk preparedness and resilience assessments conducted by large companies. This brings essential geological knowledge to bear on identifying and mitigating subsurface risks, enhancing overall project security and implementation success.

3.3. Launch a Strategic EU-wide Geological Workforce Initiative

- Create targeted EU programmes designed to attract new talent to the geosciences and provide continuous professional development (CPD) to the existing workforce.
- Address the geological skill force explicitly within the EU Professional Qualifications Directive to streamline cross-border mobility and create a truly integrated European talent pool for the raw materials sector.

4. Conclusions

The 2025 amendments to the CRMA are a positive step towards bolstering Europe's industrial monitoring and circular economy. However, the text overlooks the fundamental prerequisite for achieving genuine strategic autonomy: a strong, mobile, and competent geological workforce, whose

expertise is formally recognised and integrated into the governance, risk assessment, and implementation of the CRMA.

Geological knowledge is not a commodity; it is the critical intelligence that underpins resource security. By certifying and empowering its geoscientific professionals, the EU can significantly enhance project resilience, improve risk management, and ensure the successful implementation of its raw materials strategy.

EFG and its network of certified European Geologist (EurGeol) professionals stand ready to collaborate with EU institutions and Member States to fill these gaps, guarantee the technical and ethical quality of raw materials projects, and build a truly resilient and autonomous Europe.

About EFG:

The European Federation of Geologists (EFG) is the largest and most influential network of geoscience professionals across the Council of Europe countries, with 27 national associations representing a direct membership of approximately 50,000 individuals. EFG collaborates extensively with leading geoscience organisations worldwide, including in Australia, the USA, Canada and South Africa, indirectly reaching over 150,000 experts.

