

TIE Position on the Proposed Amendment to the Critical Raw Materials Act

April 2026

Highlights:

- Motorised toys have negligible critical raw material recovery potential.
- Physical labelling requirements are technically impractical for small products such as toys.
- Digital solutions and the Digital Product Passport (DPP) should be prioritised.
- Implementation timelines must be aligned with DPP obligations. For toys, this means alignment with the Toy Safety Regulation (2025/2509).

While the Critical Raw Materials Act (CRMA) aims to improve the recovery of critical raw materials, the proposed amendment's inclusion of motorised toys raises concerns over feasibility, proportionality, and effective implementation.

This paper outlines TIE's recommendations for a more targeted and practical approach.

By refining the scope, embracing digital solutions, and allowing adequate time for adaptation, the EU can ensure that the CRMA delivers on its objectives without imposing ineffective burdens on industry and hindering the Single Market. We ask therefore policymakers to:

1. **Address the right products** – The CRMA should focus on products where material recovery is feasible and impactful. Small electronic goods such as most motorised toys are not products with sufficient recovery potential.
2. **Allow digital labelling** – Labelling requirements designed for larger appliances are challenging for the small products in the extended scope. The opportunity to digitalise information requirements supports implementation and is in line with the Commission's simplification agenda.
3. **Align implementation timelines with relevant EU laws** – New products in scope need sufficient time to adapt to the CRMA requirements. Moreover, all products in scope should have equal opportunities to exploit the potential of the DPP.

1. Address the right product

Motorised toys should not be a priority target for several reasons, notably because of:

- **Missing justification:** The proposal does not provide clear evidence of the impact and/or benefits of extending the requirements to cover toys with smaller motors. The EU should select relevant products based on scientific evidence.
- **Unclear definition:** The Commission's proposal does not provide a legal definition of 'motorised toy'. This creates uncertainty regarding which products fall within scope and may lead to inconsistent application across Member States.
- **Technical impracticality:** Many motorised toys are small consumer goods, and the magnets they contain are consequently smaller. Not only are such magnets difficult to extract, but their recovery value is minimal, not worth the operation costs, making the requirement disproportionate and ineffective.

Recommendations:

- **Remove ‘motorised toys’** from the scope of Article 28.
- Clarify that the already existing definition of **‘electric motors’** includes all **consumer products equipped with motors of 0.12 kW or above**. This threshold sees the requirements applied to the largest motorised toys and products which have the best recovery potential

2. Allow digital labelling

The physical labelling requirements (label and QR code) pursuant to article 28 of the CRMA address information for professionals, not consumers, and pose unnecessary challenges for manufacturers. We believe that this label:

- **Contradicts the EU agenda:**
 - o The European Union’s simplification agenda emphasises reducing administrative burden, including by digitalising information (‘digital by default’).
 - o The measure risks further fragmenting the Single Market: labels need translation in different languages, creating *de facto* a range of national labels.
- **Is not feasible for toys:** Although the CRMA aims to target high potential products, there is a clear difference between the first products in scope (larger appliances) and those listed in the proposed amendments. Most toys lack the space or design capacity to accommodate detailed physical labels.
- **Confuses consumers:** Even when the product is large enough for an additional label, the coexistence with several other mandatory labels and markings (product safety, environment, etc) risks confusing consumers.

Physical labels on small toys are impractical and counterproductive.

Recommendation:

- Instead of a physical label, allow economic operators to opt for a **digital-only label, accessible through the DPP data carrier**.

3. Align implementation timelines with relevant EU laws

The proposal does not address inconsistencies and challenges with implementation timelines.

- **Different adaptation period:** Manufacturers of products already in scope have been aware of the requirements of the CRMA for the last two years. New products in scope will inevitably have a transition period that is too short and risk being discriminated against: there will be insufficient time to properly catalogue all magnets, present in complex sub-assemblies, across a complex supply chain and then apply the appropriate label to the finished products.
- **DPP functionality:** Toys will not have an implemented DPP by the date of application of the CRMA. The recently adopted Toy Safety Regulation (EU) 2025/2509 mandates the DPP as of 1 August 2030. Without an operating DPP, toy manufacturers will have additional work, costs and administrative burden.

Recommendation:

- **Align the CRMA timeline with the implementation of the DPP.** For products in scope of the Toy Safety Regulation (EU) 2025/2509, this means that labelling requirements should apply not earlier than 1 August 2030.