

**Priority question for written answer P-002919/2024
to the Commission**
Rule 144
Christian Ehler (PPE)

Subject: Polysilicon between the Critical Raw Materials Act (CRMA) and the Net-Zero Industry Act (NZIA)

The CRMA states that ‘raw materials, including in unprocessed form, at any stage of processing [...] shall be considered to be strategic raw materials’ (Article 3). Silicon metal is listed as a strategic raw material. NZIA states that “‘component’ means a part of a net-zero technology final product that is manufactured and traded by a company, including processed material’ (Article 3(2)). Polysilicon is the result of extensive refinement of silicon metal, and it is almost exclusively used for two specific purposes, with large parts going to solar technology production and a small amount being used for semiconductors.

1. Given that polysilicon is the result of extensive refinement of silicon metal and its specific use cases in solar and semiconductor applications, would the Commission agree with the assessment that polysilicon fits the scope of Article 3(11) of NZIA insofar as it is ‘suitable for a specific function in a net-zero technology supply chain’ and that it should therefore be included in the scope of NZIA?
2. What further substances for which such clarification is required has the Commission identified and what methodology is applied to provide such clarification?

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