

June 26, 2025

IZA Advocating for License to Operate Globally: Advocacy Efforts in Europe

Our IZA team works around the world to ensure and expand license to operate. Many regulatory proposals originate in Europe, where our European Affairs team closely monitors this legislation and advocates for positions that will limit or reduce the burdens faced by our whole value chain of miners, processors, recyclers, and downstream users of zinc, co-metals, and compounds. This year, our team is actively engaged in dialogue on the Clean Industrial Deal, Transition Pathway for Metals, Steel and Metals Action Plan, the REACH program, and the Water and Soil regulations.

Earlier this year, European Affairs Director <u>Howard Winbow</u> and Manager <u>Mik Gilles</u> joined 400 industry leaders in Antwerp to support the launch, by European Union (EU) Commission President Ursula von der Leyen, of the industry-advocated <u>Clean Industrial Deal</u>. This initiative sets out an action program for enhancing European industrial competitiveness and accelerating decarbonization while also addressing elevated energy prices and climate issues. Through a combination of financial incentives and support, this initiative should enable the European metals industry to expand production and adopt clean energy technologies, creating more opportunities for zinc mining, smelting, and recycling within Europe.

Post-launch, the IZA team proactively started data collection to calculate specific electricity use for zinc refining and derive a new benchmark value to address the EU Emissions Trading System, the cap and trade system designed to reduce greenhouse gas emissions and a key part of the Clean Industrial Deal. This data, along with an industry study, will be used to advise the EU Commission on important options for the Emissions Trading System after 2030. Furthermore, IZA is monitoring an anticipated Commission proposal to address export-related carbon leakage related to the EU carbon border tax, also known as the Carbon Border Adjustment Mechanism.

The IZA team continues to advocate for delivery of deal provisions and partners with like-minded associations to amplify its messaging efforts. These include supporting the deal's push to simplify and reduce duplicative regulations on businesses. Various proposals support these objectives, such as the first Omnibus package aimed at streamlining Corporate Sustainability (CSRD) and Due Diligence (CS3D) reporting and modernizing the Chemicals Management approach in the much-anticipated REACH 2.0 revision, expected in the fourth guarter of 2025.

Focusing on Metals

Beyond the Clean Industrial Deal, the <u>Transition Pathways for Metals</u>, recently published alongside a <u>Steel and Metals Action Plan</u> for Europe, provides another opportunity for delivering vital messages on zinc and its co-metals. IZA served as a key contributor to and editor of this important EU Commission document, which identifies more than 60 actions and conditions to support green and digital transitions and improve resilience in the metals industry.

Importantly, the Commission recognizes that the metals industry has been the backbone of European industry for centuries and plays an essential role in these European transitions, being at the basis of Europe's major value chains, including automotive, construction, and defense. Another upcoming key legislative activity, as announced in the new Commission's flagship Competitiveness Compass, will be a new Circular Economy Act. With the first draft expected towards the end of 2025, IZA will engage in the narrative to ensure the balance of decarbonization with circularity is well recognized, while the appropriate recycling rates, rather than content, are used in the draft proposals.

In addition, the EU Commission will soon publish the updated <u>Water Framework Directive</u> and the new <u>Soil Monitoring Law</u>. For the past two years, the IZA team, including Environment Senior Manager <u>Chris Cooper</u>, has met with the Commission, European Parliament and the Council of the European Union to advocate for metal specificities to be recognized in both the water and soil. The next steps will be for IZA to continue its Member State outreach program to cover water and soil, ensuring that the most recent data and best scientific methods are implemented, as well as educating regulators that zinc is both essential and naturally occurring in the environment. IZA's activities in these areas will help safeguard the more than two million tonnes of zinc and zinc compounds used in key applications across Europe each year.

Some of IZA's most time-consuming advocacy and research revolves around the existing EU REACH. The Registration Evaluation and Authorization of CHemicals Regulation, which has been in place since 2007, requires that the 48 substances IZA covers, including zinc metal in massive and powder form, zinc process intermediates, and zinc compounds such as zinc oxide and zinc sulphate, be registered and undergo frequent reviews. By staying on top of the research, conducting testing programs to fill knowledge gaps, and managing complex scheduling, IZA has assured that all zinc, cadmium, germanium, and indium-related substances remain fully updated and compliant on behalf of the members. Current targeted Evaluation checks by the European Chemicals Agency (ECHA) require IZA to defend these quality dossiers from time to time. Currently, the IZA REACH team, which includes Associate Director Christine Spirlet, Senior Manager Noömi Lombaert, and others, is holding meetings with the Commission, ECHA, and Member States to significantly reduce future test proposals, an effort which will provide savings of multi-million Euros if successful.

This intensive monitoring and advocacy effort in Europe reaps benefits for IZA members in other countries, which often adopt Europe's regulatory strategy. For example, IZA member investments in research and EU REACH also are being repurposed for chemical management and environmental quality requirements in Australia, Canada, Chile, Colombia, India, South Korea, Taiwan, Turkey, the United Kingdom, and the United States. You can keep track of IZA's legislative and advocacy work on our <u>Compliance webpage</u>.



Spotlight on the United States: Taking on Tariffs

The on-again, off-again nature of the 2025 U.S. tariff policy has posed a number of challenges for companies located both in the United States and around the world. While many forms of zinc, including zinc metal, zinc oxide, and zinc sulphate, are currently exempted from tariffs under Annex II, other forms such as zinc powder are not. In addition, the U.S. Department of Commerce currently is conducting an assessment on zinc and other critical minerals for potential changes with regard to tariffs. IZA Executive

Director <u>Andrew Green</u> is working closely with IZA members, downstream users, and IZA's contacts at the Department of Commerce, to provide information and data on these issues and markets.

A key part of IZA's advocacy is educating regulators about the critical role zinc metals and other forms such as zinc dust play in key U.S. and global markets, including infrastructure, transportation, electronics, medical devices, military equipment, energy storage, and other aspects of the energy transition. Using information and data, IZA staff will continue to meet with key policy makers and serve as an advocate for zinc and the industry as the tariff situation continues to evolve.



Guiding Water Regulations around the World

The IZA Environment, Health & Sustainability (EHS) team has served as trusted advisors on water regulations in Australia and New Zealand for a number of years, and this relationship will soon culminate in updated water quality regulations and an August workshop providing guidance on implementation in Wellington, New Zealand.

IZA involvement began in 2017 and resulted in a workshop in Sydney in 2023, which produced a tiered assessment framework, using bioavailability-based guidelines similar to methods adopted in Europe. EHS Director Eric Van Genderen and Environment Senior Manager Adam Ryan worked with state and national regulatory scientists from Australia and New Zealand, international experts, and industry sponsors to develop the framework, which incorporates the beneficial impacts of various water chemistries as well as more extensive data.

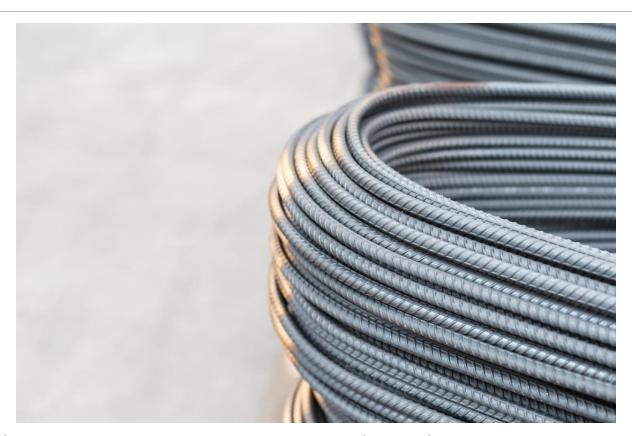
Working with metal association partners from IZA, the International Copper Association, and the Nickel Institute, Australian and New Zealand regulators have derived guidelines, curated databases, developed web-based tools, and generated training manuals for users and stakeholders.

IZA's involvement ensures that Australia and New Zealand will use the best available scientific data to assess the impact of zinc and other metals on water quality. The assessment tool and guidelines will be made public in late 2025.

Different Approach in Canada

IZA has demonstrated that same effort in providing expert guidance in Canada, where Eric Van Genderen reviewed and advised on the Canadian Council of Ministers of the Environment's bioavailability-based Water Quality Guidelines prior to their finalization in 2018. In addition, IZA opposed the overly stringent Chemical Management Plan's draft screening assessment and associated risk management scope documents for zinc and soluble zinc compounds. The IZA team met with government regulators and shared the European Union's REACH dossier to encourage international consistency for chemical management programs. Canada has not yet finalized its assessment for zinc and soluble zinc compounds.

IZA also met with Environment and Climate Change Canada as well as Health Canada to discuss the sharing of nanoscale zinc oxide data to support ecological and human health risk assessment. IZA consistently has reported that nano zinc oxide is simply a source of dissolved zinc, which already is covered under existing environmental quality standards. The Canadian government is expected to announce a decision shortly.



Increasing Markets through Advocacy in India

IZA's India team, including Rahul Sharma and Soumitra Das, has gained remarkable market results through its interactions with government officials. At the end of last year, IZA successfully lobbied for a specification for continuous galvanized rebar, enabling CGR to take on a larger role in construction and infrastructure projects. Similar strides have been made with India Railways, which adopted and published a specification for zinc thermal sprayed rail, to be manufactured soon in a pilot rail metallizing unit in India.

Beyond zinc coatings, the IZA team has secured significant wins for zinc fertilizers through the <u>Zinc Nutrient Initiative</u>. IZA advocacy has led to government subsidies for fertilizer manufacturers using zinc and other micronutrients. The Ministry of Agricultures also offers subsidies as well as other financial assistance to farmers using micronutrient fertilizers.

The Zinc Nutrient Initiative also is collaborating with the Indian Council of Agricultural Research to evaluate the efficacy of zinc fertilizers through trials with a variety of crops and climates. You can learn more about the successes and ongoing projects led by IZA's India team here.



IZA's Emmanuel Alejandro Ramírez Gutiérrez trains future Zinc Champions in Paraguay.

Advocacy through Training in Latin America

Across Latin America, the IZA team works its advocacy magic through extensive outreach and intensive trainings for galvanizers. For about five years, IZA's Hot Dip Galvanizing (HDG) Inspection Champion Training & Advocacy program (CTA) has collaborated with local galvanizing organizations to train a select group of experts in quality control, inspection, and acceptance of HDG products, and then organizes them to train their local galvanizing and customer community to increase awareness about product quality and quality specifications related to coating durability, maintenance, and lifetime as well as to promote HDG as an effective coating solution.

IZA experts, including Emmanuel Alejandro Ramírez Gutiérrez and Savio Ce, have trained more than 350 galvanizers across Latin America, including in Argentina, Bolivia, Brazil, Colombia, Ecuador, Paraguay, and Peru. The resulting graduate Champions then teach the course in their respective countries, tailoring each session based on the particular local hot dip galvanizing market. The Champions also train local government leaders, regulators, and specifiers, effectively promoting the minimum quality requirements and durability expectations of HDG steel products.

Speaking and Writing of Zinc

Andrew Green's editorial on how zinc performs as an agent of decarbonization recently was featured in <u>MINING.com</u>. Andrew describes the economic and environmental value zinc adds by extending the service life of residential construction, critical transportation, and energy infrastructure and introduces IZA's Zinc Enables Decarbonization program.

Thanks to International Zinc Conference speaker <u>Patrícia Bordon Sarac Barreto</u> for her excellent story on rechargeable zinc batteries meeting the growing demand for energy storage from both the power grid and increasingly from data centers. You can see some of her key takeaways <u>here</u>.

IZA's <u>Howard Winbow</u> and <u>Martin van Leeuwen</u> attended the European General Galvanizers Association (EGGA) Assembly 2025 in Dublin, where Howard chaired a session on the Circularity of Zinc. Howard and Martin learned about the latest regulatory, sustainability, and technological developments affecting European galvanizers.

Sabina Grund moderated a panel discussion on women working in the zinc industry in Krakow at EUINdTech2025: Industrial Technologies and Materials for a Sustainable Europe conference, one of the flagship events of the Polish European Union Presidency. While in Poland, Sabina enjoyed the opportunity to visit IZA member Huta Cynku Miasteczko Śląskie S.A. as well as ZGH Boleslaw S.A. and discuss the criticality of zinc smelters for Europe's circular economy.

<u>Kevin Irving</u> and <u>Martin Gagné</u> are making the case for zinc coatings at a variety of North American conferences. Recently Kevin explained how a single coat of zinc-rich paint can greatly extend the life of any project and prevent corrosion at the Great Lakes

Coating Conference in Ann Arbor, Michigan, while Martin presented his paper on "Extending the Lives of Structures with Thermal Spray Zinc Coatings" at the Canadian Society for Civil Engineering in Winnipeg, Manitoba.



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