

1) **Do you have any comments on the methodological approach, including the scope, to determine criticality at EU level? If so, please specify.**

- General agreement to the methodology.
- In some cases the lack of statistical data is evident (e.g. estimates for substitution, recycling, a.s.o.)
- Scrap is not covered sufficiently
- list of critical materials is based on quantitative approaches only. Problems may arise with some industrial minerals, where quality is not considered separately (e.g. fluorspar, barites etc).

2) **Do you see any additional raw material that should be considered as critical? If so, please explain.**

- lead, tin, gold, phosphates, potash, zircon,
- coking coal (as main constituent of steel production)
- construction materials should also be considered as critical, if access to resources is limited due to several reasons. However this needs a different methodology (see Austrian Raw materials Plan)

3) **Do you have any comments regarding the recommendations of the report? If so, please specify.**

- recommendations concur with the EU non ferrous metals industry expectations about EU policy lines ...
- potential of substitution is very limited;
- recycling rate can be promoted by producing recycling friendly products

4) **Are you aware of any initiatives in your country that aim to assess the criticality of raw materials? If so, please describe briefly.**

- No; Austria had a similar approach with special emphasis to economic importance and supply risk, but stopped working with regard to the

Commissions initiative; Environmental risk was not a special matter; Estimation of criticality was expressed verbally only.

5) **The functioning of raw materials markets has not been dealt with. Do you think that further analysis of their functioning should be carried out? What actions should be proposed to increase their transparency?**

- The answer of Eurometeaux is fully supported. Industry is the most effective and accurate source of information about the functioning of its raw materials markets, meaning that the monitoring and the assessment of market problems by the institutions should rely on the expertise of the industries concerned and their representative bodies. Experience shows that analytical work commissioned to external consultants is generally expensive, unsatisfactory and goes together with a lack of focus on, and knowledge of, the actual problems as well as a considerable loss of time for industry experts called for peer review.
- The Commission can play a very useful role, however, to increase and improve the level of information on market distortions by mobilizing the Delegations and the national embassies on any regulatory developments that affect trade in raw materials in particular. The Commission and the Member States can play a very useful role also by creating awareness of the problems and calling for transparency on their systemic causes at international level (e.g. the project of an inventory of trade restrictions on raw materials at OECD level). All this is already done in DG Trade-Market Access and should be encouraged.

By that, the Commission can certainly promote transparency by means of better statistics on trade flows of sensitive materials such as scrap.

6) **Do you think that the EU should propose a system of stockpiling for the critical raw materials ? If so, please indicate whether you consider it more appropriate to do this at Community or alternatively at Member States level**

neither on EU nor on MS level

However, companies should be encouraged for stockpiling their own (special quality) demand with financial subsidies or privileged taxation, as different companies use different qualities of commodities...

7) **Do you think that the importance of trade is adequately reflected in the work carried out so far in the Raw Materials Initiative?**

- Not reflected in detail.

8) **Do you have any comment regarding the main findings of DG Trade activity report? What activities should be prioritised? Are there, in your opinion, additional activities not mentioned in the report which should be pursued in this strategy?**

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9) **Please identify trade distortive measures (i.e. export restrictions) concerning raw materials that in your view should be tackled.**

Main problems are dual pricing, export restrictions, refunding of VAT, export bans amongst others. WTO has not acknowledged yet the fact that measures are urgently needed to ensure free and fair trade in raw materials

10) **Are you aware of any initiatives in your country that have one of the abovegoals in mind such as, for example, developing a raw materials diplomacy, or supporting companies to invest in third countries in the raw materials sector? If so, please describe briefly.**

not yet

11) **What specific actions would you consider most relevant needed in the following areas:**

- **Good governance;**
- **Infrastructure / investments;**
- **Geological knowledge / skills;**

- Good governance means also considering mineral to put mineral occurrences in land use policies and on an equal level with other natural resources (e.g. water)
- There are lots of chances to detect unknown mineral deposits. This is true for Europe as well. However an important prerequisite is a proper geological, geochemical and geophysical knowledge and a careful metallogenetic analysis. To create this information base is primarily the duty of the public administration (National and EU) and may serve as a decision base for the industry.
- Decreasing mineral industry leads to decreasing academic education and skilled workers.

12) Regarding transparency, what measures do you believe the EU should take to foster revenue transparency in the mining industry in raw material resource-rich countries? What are your views regarding existing initiatives currently being taken in this area, namely by the Extractive Industries Transparency Initiative (EITI)?

- EITI process is not applicable for all mineral commodities. In generally EITI is warmly appreciated, however, efficiency of existing initiatives (EITI) has to be checked

13: Concerning the recent agreement between the European Commission and the African Union Commission, in your view, what concrete objectives, targets and deliverables should be included in such a partnership?

- member states have not been involved sufficiently in the decision process...
- Abovementioned agreement is a toothless paper which is insufficient to secure minerals supply...

14) **Do you consider that wood should be addressed in the framework of development policy? If yes, please specify what are the main issues to be analysed.**

- Wood, rubber and other commodities are doubtless of great importance as well. **However, Raw materials Initiative should be focused on minerals only.**
- It is suggested to create a similar initiatives for biogene materials, if appropriate..

15) **Are you aware of any initiatives in your country that contribute to promoting exploration and exploitation of mines in developing countries? Should such initiatives be better coordinated or promoted at the EU level?**

- No; projects with special emphasis for minerals supply (incl. exploration of deposits) is primarily a matter of companies, which are not controlled by the state.

16) **Do you agree that these topics correspond to the major challenges in this policy area? If not, please specify**

- All of the topics mentioned doubtless correspond to the major challenges !

17) **Do you think of any other avenues which should be followed by the Commission? If yes, please specify.**

- Not for the time being

18) **Do you agree with the recommendations made in the report on "Exchanging Best Practice on Land Use Planning, Permitting and Geological Knowledge Sharing" or do you have any specific ones to be added. Please explain.**

in general yes

19) Do you consider it useful to establish an EU geological service based on a network of Member State geological services?

A new European Geological Survey is not supported. Better networking, based on existing organisations (eg Eurogeosurveys), is much more appropriate.

20) Do you consider that EU regulatory framework conditions for wood and/or recovered paper need to be further analysed? If yes, please specify.

Whithout ignoring the importance of these commodities, not within the RMI

21) Skills: What type of actions would you propose to provide better cooperation between companies, universities and public authorities in order to promote skills and in the extractive or other raw materials sectors? Please specify.

- PR to promote awareness to the general public
- Scientific conferences and workshops for students, authorities and other stakeholders,
- Scientific courses like "Sandvik International Mining and Construction School" <http://www.si-ms.com> a cooperation between a company and various mining universities

22) Research, Development and Innovation: Are you aware of any research, development and innovation programme(s) at national, regional or local level? Please specify.

- Special (federal) fund for minerals research in Austria, financing projects of general interest (geochemical survey, minerals potential); Additional funds from provincial authorities

23) Where do you see the major gap / the urgent need for the raw materials sector related research, development and innovation at EU level. Please provide details.

- acknowledgement of prospection and exploration activities beside the development of particular methods or techniques fully as R&D in the OECD Frascati manual as well, in order to stimulate the cost intensive and risky activities.
- It is of utmost importance that any prospection and exploration work is seen as a part of R&D, and not as a routine work of the mining industry. However it is important to distinguish between companies activities to develop an explored area for exploitation (in those cases the mineralisation is yet known), from exploration, which the main purpose to find new mineralisations
- exploration activities of the industry (including drilling) may be stimulated by setting a privileged taxation for research and development and would be not only of benefit for the companies, but for the minerals supply in general as well.

24) What is your idea of a major research and innovation action that would have the highest positive impact on the security of raw materials supply for the EU industries? Please specify.

- Research, development and innovation is insufficiently covered by existing Research Framework. Therefore it is of great importance to close this gap on the following sectors:

1. Mineral processing:

Many of the critical mineral commodities occur as byproducts in complex ores in very low concentrations. Improvements in mineral processing technologies could make it possible to economically exploit these low concentrations of critical minerals. One recent example is rare earth minerals in the copper shale deposit in Middle Germany which is presently under investigation.

2. Extraction of critical minerals from old mine dumps:

Many old mine dumps contain low concentrations of minerals for which in the past there was no economic interest but which today are of considerable interest. Areas requiring research:

- Survey and assessment of old mine dumps.
- improved methods of mineral processing
- Investigation of material properties of yet unusable minerals to define new applications
- Investigation of extraction of rare metals / minerals from unusual sources (e.g. formation water of oilfields or and fly ash from coal combustion)
- Development of ultra fine milling in mineral processing

3. Mineral extraction from deep deposits.

In the medium to longer term mineral exploitation from very deep deposits will become more important to ensure ongoing supply with critically important mineral commodities. Areas requiring more research are:

- underground processing and concentrating of minerals to reduce costs of mineral transport from great depths and to reduce space requirements for mine dumps
- improved methods of mine cooling and utilization of rock heat
- improved methods of ground control and rock pressure related safety hazards.
- Developing of environmentally sound exploitation and processing methods

4. Mineral exploration in general

- Developing new integrative and innovative exploration (GMES, geology, geochemistry, geophysics) strategies
- Developing new metallogenetic models as a tool for exploration
- 3D modelling of exploration results
- Developing of direct geophysical / geochemical methods from drill holes
- Development of innovative robust multivariate statistical methods (eg combination of geological, geochemical and geophysical data as a tool for mineral exploration)

25) Are you aware of innovative exploration and extraction technologies, where project partners on a European level are needed to develop and implement the new technologies and which are the innovative technologies which need to be developed further. Please provide details.

Some running projects of Mining University of Leoben

26) Are there any other aspects related to skills, R&D and innovation for other raw materials, such as wood, that need to be further promoted? Please, specify.

- Not within the RMI

27) In your view, and beyond measures already being taken (e.g. the recast of the WEEE Directive), what practical measures can be taken by the EU and by Member States to prevent the illegal shipment of obsolete end-of-life vehicles and electronic equipment?

See comments of Eurometaux

28) In what ways should statistics on trade in, and recycling of, products containing secondary raw materials be improved?

See comments of Eurometaux

29) Have you identified major problems with recovered paper? What are the main issues that need to be further analysed?

- No, not within RMI