

RMI Public consultation, Aug 2010

CRITICAL RAW MATERIALS

1. Criticality must be considered in a regional and quality based context. Limestone may be given as an example as it is critical within the Baltic Sea area. High quality limestone as raw material for quick lime production is actually limited in occurrence to one single location on Gotland island.
2. Phosphorus should be added to the list of critical minerals within the EU. There are very few deposits of phosphorus within the union. Global supply is located to a few countries.
6. Yes, the EU should propose stockpiling of critical mineral raw materials. There is a global need for a balanced security besides what USA is doing. This should be done or at least coordinated on community level.

TRADE

8. Negotiations aiming for promoting trade and investment security for EU member states in Russia is needed. Russia provides a high potential raw materials supply as a direct neighbor to the EU but security of investment is hindering EU members to engage there.
9. The listing of strategic areas with limited access for foreigners in Russia , which includes mineral raw materials, is such a restriction.

DEVELOPMENT

No comments

REGULATORY FRAMEWORK

16. Yes. But still, competing land use interests and safeguarding of mineral interests should gain more focus in the initiative and the communication.
17. A certain level of harmonization of the mining legislation within the EU would be needed. For the moment there are very big variations in the legislation between member states. Strong efforts should be made to ensure the uniform application of the RMI principles in the member states.

Natura 2000 restrictions must be lightened and the new guidance must be transferred to the member states and included in the local practices. For the time being some states apply even a buffer zone of prohibited exploration activity, in addition to the formal Natura 2000 areas, which by themselves are broadly defined.

19. There is no need for a formal EuroGeoSurvey. Good networking of the national geological surveys is enough.

20. No

SKILLS AND RESEARCH

21. Major framework financing R&D programs within the mining sector are needed. The whole EU has a need to maintain the mining skills, why research and education must be supported. A temporary downshift in mining activities in some member state does not justify ending of research and education. A next boom will follow and if there aren't skilled personnel available anymore it is very difficult to start up new projects. Finland is a good example of this development from the times from the 90-ies to the decade of 2010.

22. There is going on in Finland a project to produce national mineral policy. Moreover there is carried out a study to bring up the effects of extractive industry for the economy of the whole country. This kind of information is needed to deliver right information for the decision makers and public. Too much false information is shared about mining and its importance for community.

23. Deep ore exploration methods provide a potential area of development.

24. Extractive industry should have bigger role in Framework Programs in future.

RESOURCE EFFICIENCY AND RECYCLING

28. Extractive "waste" must not be considered ordinary waste. Especially left over material from industrial minerals mining is totally harmless and left over material should rather be considered as a future raw material base. Enterprises could possibly be guided to store such materials as pure fractions in order to ensure later use of such raw materials. Legislation should make recycling and use of left over raw materials easier, not to prevent it.