

# Ministry of Employment and the Economy of Finland

## RESPONSE TO

### Public Consultation on the preparation of a new Communication on Raw Materials

#### **DEFINING CRITICAL RAW MATERIALS**

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

**The criterion for defining critical raw materials and their classification is basically indicative in nature and should not be used as basis for defining or discarding “non critical” raw materials. In order to emphasize the importance of other raw materials to policy makers, programme officers and the general public we would like to consider adaption of following classification; important raw materials (including all 41), critical raw materials (economically very important) and highly critical raw materials (including these 14). The criticality is also very much depending on the industrial structure of countries and regions.**

**Several of the listed 14 raw materials are by-products. Their production is highly dependent on the production of main mineral substances such as aluminium, chromium, copper, nickel, tin or zinc. Although difficult the production and markets of these carrier raw materials should also be considered.**

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

**As the food production and fertilizers will be a major issue in coming years we suggest addressing also the importance of Potassium and Phosphate.**

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

**See comment No 1. It is essential to declare that not only these 14 are critical to the EU.**

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

**The Mineral Strategy of Finland will be completed in October 2010. One of the initiatives in the strategy is mapping of mineral resources in Finland, and which raw materials can be critical to Finnish industry and communities.**

*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?*

**Yes, this is a very important research topic and all actions that would increase transparency should be taken. An analysis about bilateral and multilateral agreements and treaties in raw materials market in the world is needed.**

*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.*

**Every Member State should individually decide if there is a need for stockpiling of critical raw materials. Otherwise all actions that will secure free and transparent trade without restrictions will reduce the need of stockpiling.**

#### **TRADE**

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

**The need for more detailed information on trade of raw materials, including recycled materials, is essential. Complete trade flows and precise import statistics, including raw materials in intermediate goods and components, is needed.**

*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?*

**Global trade distortions are the key issue.**

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

**Discriminating bilateral trade treaties and agreements.**

10. Are you aware of any initiatives in your country that have one of the above goals 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.

No.

## DEVELOPMENT

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

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

All three areas are equally important and linked to each other. Developing countries should have such national mineral policies, which include transparency, good governance and corruption-free administration. They are the basis for sustainable use and management of raw materials. Capacity building in developing countries is needed in following areas; economical and environmental planning of mineral sector, geological data, geological knowledge and skills in addition to good governance that includes development of overall legislation, licensing systems, environmental permitting and investment promotion.

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)?

Transparency and corporate social responsibility linked with sustainable development ethics are needed. In general, Finland and EU should support and implement the global initiatives, including EITI.

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?

Mineral resources issues should be included into partnership in order to develop common strategies between Europe and Africa. On going EU-level activities, like AEGOS, should be reinforced and individual MS should increase their bilateral activities to create an effective expertise and technologic support for a sustainable development of the mining sector in African countries. Fellowship programs for students from partner developing countries should also be considered.

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.

**Yes. The main issues to be analysed are to specify policy how to exploit the increasing forest resources in the EU, and to promote sustainable forestry in developing countries, especially in those which are exporting big quantities of wood to the EU.**

*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.**

#### **IMPROVEMENT OF THE REGULATORY FRAMEWORK CONDITIONS INSIDE THE EU**

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

**Yes. GTK (Geological Survey of Finland) was taking part in this process.**

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

**No.**

*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.*

**Yes. GTK (Geological Survey of Finland) was taking part in this process.**

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

**Better networking, shared information infrastructure and co-operation between the MS geological services (surveys) is needed to increase common minerals intelligence, achieve synergies, create harmonized data and statistics, secure free access to data, and secure raw materials supply from European sources.**

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

**Yes. There is a need to create/formulate one regulatory framework for the public procurement policy of wood based products within the 27 EU countries. At the moment these regulations vary between member states and form some barriers to trade in wood based products.**

## **PROMOTING SKILLS AND RESEARCH, DEVELOPMENT AND INNOVATION**

Skills:

*21. 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.*

**The Mineral Strategy of Finland will be completed in October 2010. One of the key proposals of the strategy is to provide better cooperation between companies, universities and public authorities. Focus should be on minerals intelligence, development of new exploration methodologies, productivity of mining, processing and material efficiency.**

**Education and training: Recognition of raw material-related issues in EU-wide training and education programmes.**

Research, Development and Innovation:

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

**The Mineral Strategy of Finland will be completed in October 2010. New technology program for the minerals industry is one of the key proposals.**

*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.*

**Focus should be on minerals intelligence, development of new exploration methodologies, productivity of mining, processing and material efficiency when planning FP8 research programmes.**

**Major development areas in R&D are:**

- **3D-modelling of mineral potential areas**
- **New and innovative exploration methods**
- **Exploration for high tech and highly critical raw materials**
- **Invisible and intelligent mine**
- **Increased resource efficiency; materials, energy and water**
- **Chemical-biological enrichment methods**
- **From waste to products**
- **Recycling, re-use and substitution**
- **Geo-information systems and statistics**
- **Environmental impact assessment**

*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.*

**As the EU raw materials supply is highly dependent on import we suggest approach that would recognize both import and domestic supply aspects. Firstly, secure of import raw-materials could be associated with research and innovation in the field of services and good governance. Secondly, the European Technology Platform on Sustainable Mineral Resources Vision Document and Strategic Research Agenda should be consulted in a case of domestic supply.**

*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.*

**See answers 23 and 24.**

*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.*

**Yes. It's important to create common European system for the on-going forest resources inventories in order to have updated information on the volume of exploitable quantities, and on forests role as carbon sinks.**

#### **RESOURCE EFFICIENCY & RECYCLING**

*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?*

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

**Official EU statistics can be improved by data collection, monitoring and reporting on resources such as waste rocks and tailings from both closed and operating mines and quarries.**

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

**Yes. How to make sure that the recycled paper is not produced from illegal sources (ref. Flegt action plan).**