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Ministry of Economy
Directorate for Energy
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Department for Mining
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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.

No comments. Work within Working Group Criticality was done properly.

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

No additional raw materials should be considered as critical at this point, but within time list of critical raw materials will most probably change.

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

Recommendations of the report are valid. However, additional discussions will need to take place ahead of any implementation of the recommendations.

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

There are no initiatives on country level.

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?

Further analysis should be bringing together industry, international metals study groups, EuroStat, OECD, national statistical bodies, geological surveys and other organisations.

All actions that would increase transparency should be carried out.

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.

The EU should consider options / viability of this proposal.

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?

There is a need for more precise import statistics for mineral raw materials regarding the country of origin. Trade flows are unclear.

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?

A continuous monitoring system for global trade distortions should be put in place in the mineral sector.

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

NO ANSWER

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.

There are no initiatives on country level.

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 important, good governance and geological knowledge / skills are within the domain of the EU or Member states, while infrastructure / investment is the responsibility of industry. Education is often needed to improve capability in the mining, processing and exploration sectors.

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 (EITI6)?*

Yes, EU should foster transparency in all possible areas of minerals wealth management.

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?*

NO ANSWER

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.*

NO ANSWER

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?*

Such initiatives should better be coordinated / promoted at the EU level.

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.*

Topics correspond to challenges of raw materials sector in EU.

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

Additional avenue could be a requirement for a more consistent (harmonised) approach to reporting mineral statistics across Member States.

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. The best practice examples presented in the Report of the working group are very useful.

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

YES, it is a good idea to establish an EU geological service based on a network of Member State Geological Services for many reasons in favour of member states.

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

NO ANSWER.

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.

EU level training and education in raw materials and mining for students from partner resource rich developing countries could be useful.

Research, Development and Innovation:

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

There are no initiatives on country level.

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.

Major gaps in technical mining issues are in development of new exploration and drilling techniques, mining methods to increase resource efficiency, development of an EU digital knowledge base on mineral resources potential, and development of an EU minerals intelligence.

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.

Strategic Research Agenda of European Technology Platform on Sustainable Mineral Resources is good ground to indentify research and innovation actions.

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.

NO ANSWER

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.

NO ANSWER.

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?

NO ANSWER.

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

Official EU statistics should be upgraded by in depth observation of material flows.

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

NO ANSWER.