

Response to Public Consultation on the preparation of a new Communication on Raw Material

POLICY AREA: 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.

Environmental protection is considered a negative factor in evaluating criticality. This favors industries/countries which do not honor the principles of sustainable development.

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

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

We do not agree with the following recommendations

- 1) securing better access to land, and developing a more streamlined permitting processes;**
- 2) promoting exploration and ensuring that exploration by companies is regarded as research activity;**
we consider these issues a matter of individual countries and 2) should be decided on a case by case basis.

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 Austrian Mineral Resources Plan (L. WEBER, BMWFJ, Vienna, Austria).

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?

To improve the average knowledge on raw material markets would be fine.

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.

Critical raw materials have an “expiration date” and there is a risk of developing a stockpile of material that will not be needed in the future. What is really needed is to have a very good knowledge of the European mineral resources (and the cognition that mineral resources are natural resources non renewable at human scale), especially the critical ones, including old dumps, and develop a system to ensure that the access to the mineral resources is guaranteed now and in the future, avoiding land uses not compatible with the access of the resources (this comment is partially extracted from EuroGeoSurveys working group on Mineral Resources).

POLICY AREA: 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?

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?

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

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.

POLICY AREA: DEVELOPMENT

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

Good governance;

Infrastructure / investments;

Geological knowledge / skills.

Geological knowledge / skills: To provide better funding for geological research on raw materials and raw material deposits.

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)?

Transparency, corporate social responsibility, observance of sustainable development ethics are needed to avoid the potentially very damaging consequences of an unregulated international competition only driven by national and/or corporate interest. Stability funds like the Norwegian Oil fund can be a helpful measure.

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?

Following objectives should be included: (a) good governance, (b) more focus on resource efficiency in the mining and processing sector and (c) sustainable development in all mining sectors.

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 analyzed.

No.

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?

POLICY AREA: 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.

We agree, and additionally we think that improving the geological knowledge base on a regional and national level is more necessary than on EU-level.

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

A requirement for a more consistent (harmonised) approach to reporting mineral statistics in the 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.

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

No.

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

POLICY AREA: 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 EU could provide fellowships to make it possible for students to attend mineral resources and geology related training programmes in EU universities, Mining Schools and companies.

Research, Development and Innovation:

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

In Austria there are some programs (e.g. Austrian Academy of Sciences) but currently without funding.

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.

To improve geologic knowledge of resources, including economically non viable, small deposits.

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:

3D modeling in geological research should be funded generously.

Technology:

to improve extraction efficiency

to improve environmental friendly extraction

to improve recycling technologies.

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.

Geologic 3D studies should be developed further.

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.

POLICY AREA: 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? **Illegal shipments result from underestimating the value of secondary raw materials in end-of-life products. The source of the problem is that production cycles do not consider facilitating later recovery of raw materials and metals and minerals. If production cycles would adopt the cradle to cradle idea the problem of illegal shipments would be smaller.**

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

Before improving the statistics, recycling data collection and reporting is needed.

Fundamental data on recycling are lacking. Research is required urgently to improve the level of data gathering and interpretation. This is needed to ensure that this important potential source of supply is not lost to European industry.

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