

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.

YES. It would be better to list the 14 minerals as those with the highest criticality among several others which may also be considered critical.

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

YES. Phosphate, which plays a fundamental role in influencing differential growth of plants.

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

NO.

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.

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. Monitor financial instruments in the raw materials markets.

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.

NO.

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?

YES. However, more details would be useful.

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?

NO ANSWER.

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.

NO.

DEVELOPMENT

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

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

Investments in geological data acquisition and dissemination; monitoring of transparency. Geological knowledge cannot be disjunct from Good governance, both aimed at ensuring a sustainable raw material supply.

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)?

NO ANSWER.

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.

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 ANSWER.

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.

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

A more homogeneous approach across Member States at EU level and more attention to resource efficiency.

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.

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

YES. It would be extremely useful.

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.

The EU could provide fellowships to make it possible for students from developing countries to attend mineral resources and geology related training programmes in EU universities and Mining Schools. The EU-wide training offer should be identified and made accessible from a single Web portal. Focus should be on mining, processing and exploration in FP7/8 research 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.

NO ANSWER.

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.

Urgent need concern the development of an easily accessible EU database on mineral resources, sharing data from Member States, and the development of systems for recycling and re-use of minerals and metals.

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.

NO ANSWER.

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?

NO ANSWER.

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

NO ANSWER.