

Reply from Massimo Merighi (massimo.merighi@tiscali.ti) on the Public Consultation on the preparation of a new Communication on Raw Materials. Whereas more info or requirements are needed please contact ma at above email address.

QUESTIONS

POLICY AREA: DEFINING CRITICAL RAW MATERIALS

Questions:

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

None

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

Additionally the Commission may consider the inclusion of certain types of gases, not energy one, but linked to industrial development, like argon and other that are currently rare and not easy to find.

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

None

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

None

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?

The financial markets are the places where the formation of prices is made, therefore in light of the current high volume of derivatives, leveraged investment the volatilities is high and therefore the damages for real industrial users are present. The Commission should consider a proper

limitation of speculative use of derivatives in raw materials. To ensure transparency proprietary trading platforms should be banned and replaced with open public exchanges. Furthermore the availability of production data and other essential statistics is needed in order to ensure transparency.

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.

EU should start to consider a possible stockpiling of materials, the best place is at EU level with a coordination with other MS, a multilever approach should be considered.

POLICY AREA: TRADE

Questions:

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

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?

None

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

Export restriction, export duties and quota can be the most critical problem, but in addition some materials may be considered strategic or with military use priority and became tool of embargo.

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

POLICY AREA: DEVELOPMENT

Questions:

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

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

All the factors are important but at different level. The good governance is the most important factor for stabilisation and equal revenue division. Infrastructure is essential to secure the flow of material and geological to ensure proper cultivation of resources.

EU should promote the creation of a Technical Assistance Unit, similar to JASPERS or a Development Bank (real one) to ensure an appropriate coordination of funds and activities. The Regional Development model, with shared agreement between nations how to exploit together mineral resources may contribute to the stabilisation of areas. Therefore this model should be followed to ensure stability that will improve the access to resources.

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)?

The transparency will work only if binded with true effective implementation of rule of law, in addition creation of a possible Regional Development Fund funded by revenues on resources may improve the transparency.

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?

As mentioned above the Regional Development should be the leading way,

the model similar to Cohesion / ERDF implemented in Africa with proper attention to objectives and policy may enhance the dialogue and the cooperation of the different African Countries. The experience maturated by Technical Assistance unit like JASPERS should be levaeraged even outside EU, may supporting the activities of an EU Development bank that may collaborate with African Development Bank. Material initiatives may be blended with energy as natural alliance.

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.

The wood may be a resource for keeping destabilised a country, see the case of Sierra Leone, where wood as resources provided several revenues for armed groups. Therefore it is essential provide a proper tracking of resources and relevant stock to avoid rapid destruction and imporper use of wood

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?

EU should act as a motor promoting exploration and exploitation only if a proper normative scheme is in place unsiuring the appropriate rule of law, respect of Human Right and development for local population.

POLICY AREA: IMPROVEMENT OF THE REGULATORY FRAMEWORK CONDITIONS INSIDE THE EU

Questions:

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

Post bonification of minig areas in conjunction with prevention of biodiversity loss and natural landscape destruction should be embedded in all above topics.

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

A model for sharing mining resources with local population following proper development indicators should be considered. All above lines need to be framed in the context of Rule of Law and Human Rights

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.

Exchanging best practice should not lead to lowering the standard of environmental protection, on the other side should contribute to enhance the environmental protection to the highest practices in EU.

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

Yes it may be useful and may have other synergies with other sectors like geophysics, earthquakes and hydrology.

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 comment for wood, but may be useful for the recovered paper that may contribute to reduce wastage, not only of direct pulp but indirectly of other materials used in the paper cycle.

POLICY AREA: PROMOTING SKILLS AND RESEARCH, DEVELOPMENT AND INNOVATION

Questions:

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.

A possible playground could be the introduction of these topics in the Cohesion Policy with Cohesion / ERDF that being a multilayer exercise will

enhance the dialogue and the activities in such sector. More attention can be forced with availabilities of funds for specific projects at local level. The EIT should on the other side promote more research and networks activities that can be considered as a base for local projects.

Research, Development and Innovation:

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

Most of the programme in mining sector, sometimes are focused to keep employment rather than develop true innovation in the sector.

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.

Currently a possible gap is the level of substitution of elements, we are somehow locked by a technological development path towards certain technologies and materials. A true support to see how new materials, maybe even artificial may contribute to a possible substitution of current critical elements, this may in ultimate analysis lead even to different way of producing or processing intermediate raw materials.

Again here the Cohesion may be a possible field to introduce applied innovation to favour local economies and test different solution, avoiding to think at a single unique and overall solution.

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.

Yes R&D should be promoted, but Commission should take action to avoid that this will result in additional dominant position of major corporation, maybe non european that could jeopardize the security of materials. On the other side should be promoted a multipolar type of research in EU universities leading to the creation of patent of local solution. Possible synergies with energy may be considered.

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.

None

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.

Second generation of bioenergy may use products from wood, this may be considered in case of R&D while providing synergies in order to leverage results.

R&D should focus even on how metals and rare elements may be extracted from waste, in a way to create value from waste, reduce flow of material disposed and enhance economy of secondary materials.

Therefore R&D programme may focus even on design to dispose methodology and relevant activities.

POLICY AREA: RESOURCE EFFICIENCY & RECYCLING

Questions:

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?

Improve tracking of obsolete elements in addition to proper recycling of materials, the legislation in all MS should be levelized in order to avoid loopholes that may be used for such practice.

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

Statistics are the base, a proper database of materials and waste production is needed, in addition contrary to free movement of goods, should be tracked the movement of such kind of materials in order to avoid improper illegal export to third countries

29. Have you identified major problems with recovered paper? What

are the

main issues that need to be further analysed?

A proper modularization should be implemented, currently a lot of electronics good are simply dumped and not repaired, this is an excessive waste not only of materials but even of other products. Therefore the current logic use and waste should be reverted in a more efficient way to use good reconsidering the repair and reusage of broken appliances.