

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.	Methodological approach used in the Communication is appropriate; however, the criteria used in the Communication for selection of the 14 critical raw materials were somewhat arbitrary, as understood in the forum at the 2010 Madrid Conference on European Mining Conference. The list of 14 critical raw materials need to be revised following a consultation with the industry sectors.
2	Do you see any additional raw material that should be considered as critical? If so, please explain.	Titanium, Vanadium, Nickel and Chromium would deserve to be considered as "Critical" for their strategic importance (especially for supply under China's demand forecasts). Also, GOLD being not only a much needed raw material but "undescribed fiat money regulator" and in "very short supply in EU" should be considered in the critical raw materials list (<i>especially considering the "environmentalist political pressures on gold production" in the EU</i>).
3	Do you have any comments regarding the recommendations of the report? If so, please specify.	
4	Are you aware of any initiatives in your country that aim to assess the criticality of raw materials? If so, please describe briefly.	
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?	An EU approach to increase the transparency of supply in the non-EU country markets (which are non-transparent) would improve understanding of the market's status and predictability of the demand-supply-price projections.
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.	Stockpiling critical raw materials at EU level may cause international concerns and WTO infringements and may add a heavy regulatory burden.
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?	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?	Long-term trade agreements should not be relied on, as supply and demand fluctuations on critical raw materials may cause "force majeure" in the international markets.
9	Please identify trade distortive measures (i.e. export restrictions) concerning raw materials that in your view should be tackled.	Implementation of any "Export restriction" by the EU is not as applicable tools as in the the non-EU major supply countries (like , Russia and China).
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:	
12	Regarding transparency, what measures do you believe the EU should take to foster revenue transparency in the mining industry in raw material resourcerich countries? What are your views regarding existing initiatives currently being taken in this area, namely by the Extractive Industries	African countries have historically been exploited by some of the EU Member Countries; therefore, there will be some resistance at local level for future activities. Transparency and good diplomacy should be developed in such interactions.

	Transparency Initiative (EITI6)?	
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?	It is recommended that some of the “valorization” of the raw materials should be done in the mining countries so that the African countries get “value added” production to ease their national economic developments.
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.	Not necessarily. EU countries can be self sufficient in wood supply. This would help protect the forest preservation in the developing countries.
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.	Sufficient as it stands.
17	Do you think of any other avenues which should be followed by the Commission? If yes, please specify.	
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 once to be added. Please explain.	Agreed; however, implementation of such recommendations should also include “need/benefit analyses” rather than to be for use in “solely limiting” the raw material production activities. <i>Efforts by environmental groups to ban on use of any “specific chemical” in mining (such as the current “cyanide ban in mining” issue will be detrimental for EU’s raw materials supply, as it would be arbitrarily and politically extended for other mining techniques and chemicals used).</i>
19	Do you consider it useful to establish an EU geological service based on a network of Member State geological services?	Definitely, YES.
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, it would help to clarify the questions raised.
POLICY AREA: PROMOTING SKILLS AND RESEARCH, DEVELOPMENT AND INNOVATION		
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.	Research, Development and Innovation – State support in terms of “finance and taxes”
22	Are you aware of any research, development and innovation programme(s) at national, regional or local level? Please specify.	Use of raw materials in high-technology “composite materials” and “energy” and “scrap/recovery” fields.
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.	
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.	Development and “regulatory support” for the environment friendly mining technologies in order to minimize public objections/rejections. Arbitrary and capricious environmental objections to the mining and chemistry sector activities are not helping the Sustainable Development efforts.
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	Completing the BATs for all mining methodologies that would help ease the permitting of the the mining projects which will eventually improve the production and environmental protection efforts.

	technologies and which are the innovative technologies which need to be developed further. Please provide details.	
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?	I would recommend to observe the implementation of the existing regulations for another two years before generating further regulatory vehicles that may handicap the current activities. Additional state support for recovery of raw materials for such scraps/equipment would improve the recovery efficiencies.
28	In what ways should statistics on trade in, and recycling of, products containing secondary raw materials be improved?	
29	Have you identified major problems with recovered paper? What are the main issues that need to be further analysed?	