

Dear all,

I hereby refer to the public consultation on the preparation of a New Communication on Raw Materials.

EUROALLIAGES is the association representing the interests of ferro-alloys producers in the European Economic Area.

Ferro-alloys are raw materials indispensable to the production of steel. Silicon is a raw material used in chemicals (silicones), metallurgy (aluminium/silicon alloys), electronics (high purity silicon) and more recently, solar panels (also high purity silicon).

EUROALLIAGES is associate member of EUROMETAUX.

In that capacity, we fully support the EUROMETAUX contribution to the EC consultation.

We have however a concern in respect to the "Trade" chapter of the consultation (questions 7 to 9).

While we are also of the opinion that ultimately, "free and fair" trade in raw materials should be pursued, we however believe that a more cautious and less generic approach should be adopted. In the framework of an initiative which aims at securing raw materials supply in the EU, it should be highlighted that this "free and fair trade" principle could jeopardise existing – surviving – commodities sectors in the EU. In other words, we run the risk to protect and safeguard the interests of some commodities...to the detriment of others, which is not the objective of the RMI.

It is therefore recommended that, while the overall approach of "free trade" can be supported, a more "case by case" analysis be conducted for those commodities which are still produced in the EU and which face unfair competition from third countries.

Thank you in advance for your attention.

Kind regards

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