

Geological Survey of Belgium

POLICY AREA: DEFINING CRITICAL RAW MATERIALS

Major issues:

An expert group, chaired by Enterprise and Industry DG, recently released a report⁴ that presented a methodology to measure the criticality of raw materials at EU level. A raw material is labelled “critical” when the risk of supply shortage and their impacts on the economy are higher compared with most of the other raw materials. The report provides an analysis of 41 different minerals and metals, and concluded on a list of 14 critical raw materials. It also contained two sets of recommendations: recommendations for follow-up and further support, and policy-oriented recommendations to secure access to and material efficiency of raw materials.

Questions:

- 1. Do you have any comments on the methodological approach, including the scope, to determine criticality at EU level?*
- 2. Do you see any additional raw material that should be considered as critical?*
- 3. Do you have any comments regarding the recommendations of the report?.*
- 4. Are you aware of any initiatives in your country that aim to assess the criticality of raw materials? If so, please describe briefly.*

Not as such on the concept of but criticality of minerals but rather on their recycling potential and especially substitutes for the building industry and infrastructural works (thus rather base raw materials like sand, gravel, aggregates).

The same applies for historical building materials that are in short supply or no longer available for restoration works, leading to attempts to open new quarries.

- 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?*
- 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.*

Only in case of imminent crisis. Thus not at this moment. Stockpiling without intervention of major industrial actors seems unpractical.

POLICY AREA: TRADE

Major issues:

One pillar of the Raw Materials Initiative consists in developing a *European external strategy in order to guarantee the sustainable supply of raw materials from global markets at undistorted conditions. In this, trade policy plays an important role.*

DG Trade has recently completed its 2009 [activity report](#)⁵ on raw materials, which summarizes the progresses accomplished along the three axes of the trade raw materials strategy:

- Include, as appropriate, the relevant trade disciplines on sustainable supply of raw materials in bilateral and multilateral trade agreements.*
- Identify illegitimate trade distortive measures taken by third countries and tackle them using all available instruments, including through bilateral consultations, the Market Access Partnership process or, if necessary, the WTO dispute settlement; while delimitating more clearly permissible exceptions for e.g. development purposes.*
- Reach out to third countries to show that the question of sustainable raw materials supply is an issue relevant to all countries, developing or developed, resource-rich and resource-poor alike as the uncontrolled, unregulated multiplication of trade restrictions can lead to a generalized beggar-thy-neighbour policy detrimental to most countries; while recognising the importance of respecting internationally agreed rules on the subject.*

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?

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.

Belgium, Foreign Affairs department, has initiated in 2006 a Task Force Mineral Resources in Central Africa, in practice the Democratic Republic of Congo, (MIRECA) to strengthen government control on the mining sector, trace minerals from illegal mining and trade (mainly cobalt) and improve mining conditions as a support for a more sustainable local society (www.gecoproject.org).

POLICY AREA: DEVELOPMENT

Major issues:

The 2008 RMI Communication highlighted that development policies play a relevant role in at three 'levels':

- 'Strengthening States'*
- Promote a sound investment climate that helps increase sustainable supplies of raw materials*
- Promote sustainable management of raw materials*

In 2010, within the context of the EU-African Union partnership, the European Commission and the African Union Commission recently agreed to develop a bilateral co-operation in the field of raw materials and to work together, taking fully into account the Africa Mining Vision of February 2009 and the EU Raw Materials Initiative of December 2008, in particular on issues such as governance, infrastructure and investment and geological knowledge and skills.

Questions:

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

Good governance: Without it, there is no sustainable effect of any action to support the raw materials economy, but implementation of Good Governance is beyond the scope of the Raw materials initiative alone.

Infrastructure: Concerning the AEGOS initiative, providing the digital infrastructure for geological and mining data in such a way that temporary political or natural disruption in one state will not destroy the system or cause irretrievable loss of data and knowledge.

Geological knowledge: this is more a matter of bilateral agreements. This does not mean that follow-up would not be worthwhile on the EU level, but without proper institutes able to sustain long-term involvement (e.g. a EU geological research centre) it will be very difficult to overcome the often jealously guarded data by smaller entities.

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 Transparency Initiative (EITI)?

Transparency: no system is intrinsically transparent or remains so on the long term, certainly in view of the long lifetimes of mining compared to those of laws, environmental regulations and taxation systems. Anyway, common initiatives to improve transparency must be supported, but these must not be seen as a condition sine qua non for supporting investment and trade in mineral resource-rich countries.

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?

Actively support AEGOS project

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.

It is preferable to extend to building materials rather than to wood (or biofuels etc). High quality building materials (sand, gravel, aggregates, clay, gypsum, limestone, dolomite, ornamental building stones, etc.) are more relevant for local economic development in the third countries than the critical raw minerals. The only difference is that these mostly serve the local market and are less important for international trade (with exceptions for value-added products such as lime, cement, plaster, additives etc.). Moreover, European based companies are internationally active in this field and many possibilities exist for assistance at local community level.

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?

Belgium does not support the mining industry as such, It rather supports governments and communities dealing with mining activity. Some Belgian companies involved in minerals that do not figure prominently on the criticality list but are more important because of the volumes are active worldwide, but especially in the strong growing or emergent markets (Carmeuse, Lhoist, SCRSibelco).

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

Major issues:

- The Commission has proposed in the Raw Materials Initiative adopted in 2008 to provide clarity on how to reconcile non-energy extraction activities in or near Natura 2000 areas with environmental protection. In consultation with stakeholders a guidance document has been finalised and will be available on the web site of DG Environment⁷ before summer break.*
- As regards ways to improve the regulatory framework within the EU by promoting the exchange of best practices in the area of land use planning and administrative conditions for exploration and extraction, a report has been delivered by the relevant ad hoc Working Group⁸.*
- This report covers the following topics:*
 - Minerals Policy*
 - Land use planning policy for minerals*
 - Authorisation and permitting procedures*
 - Achieving Technical, Environmental and Social Excellence*
 - Improving the EU's geological knowledge base*
 - Better networking between the national Geological Surveys*
 - Need to integrate terrestrial sub-surface information into the GMES Land Service*

Questions:

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.

The subsidiarity principle must remain: part of the regulation will depend on public acceptance, which is primarily a local issue (in some areas it will be almost impossible to set up an extractive industry, which may be considered as a basic partner in society in other regions, generally with a long or maintained mining tradition).

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, the EuroGeoSurveys network shows that a geological service with direct link to EU will be viable. Moreover it would be vital for equal level playing between larger and smaller states (or rather between states well endowed with an extraction industry / geo-energy industries and those that lack these).

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

Not only analysis of regulatory framework but also follow-up of how it is applied in the field, more precisely to verify that the idealistic objectives are indeed achieved or that it is all window dressing.

POLICY AREA: PROMOTING SKILLS AND RESEARCH, DEVELOPMENT AND INNOVATION

Major issues:

- ☑ *Promote **skills** not only in the mining sector but also in other raw materials sectors is a matter of concern. The Commission is currently supporting this challenge via programmes such as ERASMUS MUNDUS with the specific Minerals and Environment Programme (EMMEP).*
- ☑ *Focussed **research** on innovative exploration and extraction technologies, recycling, materials substitution and resource efficiency. The Commission has recognised the European Technology Platform on Sustainable Mining (ETP-SMR) to catalyse excellent research and development collaborative projects between the industry and research organisations. In addition, via the 7th framework programme for research, development and innovation the next call for proposals in the area are expected to be public in July.*
- ☑

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. Research, Development and Innovation:

Cooperate, support or sponsor initiatives by SME's, research institutes, scientific associations, professional organisations (e.g. European federation of Geologists).

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

There are too few players in Belgium, which in some cases are each other's competitor, meaning that bilateral projects (between a company and a research institute) are more likely.

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.

Full mineralogical characterisation of the mineral deposits, their alteration products (in soils), their concentrates and waste products (during treatment).

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?

Strengthening cadastral, geological, mining, environmental services, both in EU and third countries, allowing for an efficient and sustainable mineral extraction and fair conditions for the extraction industry.

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.

This is clearly the case for the unconventional energy sector (clean energy from coal, tight shale), for the building industry (ornamental stone petrographic and rockmechanical databases of historic ornamental stones and replacement stones).

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?

Not for wood but for ornamental stones (see 25).

POLICY AREA: RESOURCE EFFICIENCY & RECYCLING

Major issues:

The 2008 RMI Communication identified that the increased use of secondary raw materials contributes to security of supply and energy efficiency. However, today many end-of-life products do not enter into sound recycling channels, resulting in an irremediable loss of valuable secondary raw materials. This mainly concerns exports of end-of-life vehicles and electronic equipment, which leave Europe as reusable products but end up being dismantled abroad. To counter these trends, the need to reinforce the Waste Shipment Regulation and related legislation was identified. Furthermore, prices of some recovered materials have reached record levels due to the high demand from third countries.

The Waste Shipment Regulation also contains requirements on exporters of waste to third countries to ensure that this waste will be treated in an environmentally-sound manner. However, compliance with this principle is not always respected.

Finally, stakeholders have identified the need for an improvement in statistics on secondary raw materials. This includes actions to be taken to measure the extent of illegal trade in products containing these secondary materials.

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?

More waste treatment facilities in Europe, but this is opposed by NIMBY and stringent environmental regulations. A balanced comparison must be made between environmental and human health cost in EU and third countries. As a result, legal and controlled export for waste recycling (not dumping) may be envisaged.

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

Very difficult, depending on the scale of the operation. Recycling inherently leads to mixing and must cope with variable quality, often approaching different environmental limitations. As a consequence statistics allowing fair comparison between companies, industrial sectors and member states (with all different operating conditions) is hard to achieve.

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

No, recycled paper comes in different qualities as well.