

19.9.2010

European Commission

Registered stakeholder n:o 3182630432-54

**Public consultation on the preparation of a new Communication on Raw Materials**

Uudenmaan ympäristönsuojelupiiri is the biggest regional branch of the Finnish Association for Nature Conservation.

Finland is just now making a national mineral strategy, but without environmental NGOs in working groups and without any SEA.

POLICY AREA: DEFINING CRITICAL RAW MATERIALS

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

We think that it is very wise to develop alternatives for rare strategic minerals, because we must think also next generations and their needs. More efficient recycling of these materials is very important.

*4. Are you aware of any initiatives in your country that aim to assess the criticality of raw materials?*

Not yet.

POLICY AREA: TRADE

EU should develop partnerships with foreign countries with strategic minerals, and invest in developing their environmental standards and good governance.

## POLICY AREA: DEVELOPMENT

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

Good governance *and* environmental know-how

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?*

Environmental standards

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.*

Yes, also REDD+ combatting Climate Change and the loss of biodiversity, and illegal logging (FLEGT).

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, but there may be some bilateral co-operation with e.g. Zambia.

EU should think partnerships to create a "green trade union" with high environmental standards.

## 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.*

We need ecological network to safeguard biodiversity and ecosystem services essential also for the future of our own society. Current studies show that we don't reach EU environmental targets like good status of waters by 2015 and the stop of loss of biodiversity by 2020 without stronger conservation actions and commitment from other sectors, including mining industry. That is why all responsible modern companies should keep themselves far away from Natura 2000 areas.

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

The Commission and Member States should use "stick and carrot" to safeguard Green infrastructure like Natura 2000 and other ecological networks and services: No mining licences and public money in and near conservation areas, but better possibilities for licences and financing far away of them.

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.*

SEA Directive and public participation are needed also in policy and strategy level. Finland is making national mineral strategy without inviting environmental NGOs into working groups and without making any SEA.

Mines are only one factor in land use planning. Sometimes a site is more valuable for society in other use. It is not wise to put a mine e.g. into a groundwater area: A mine can be in use for a century, but people need water until the next Ice Age.

The environmental risks are coming also from infrastructure needed for mines, and sometimes these harms are even bigger than from a mine itself. This means that spatial regional planning is needed at least in regional level (because roads may come from one municipality to another, but another municipality may have another plans to this area than a road for a mine).

"No go" principle for Natura 2000 and other conservation areas should be an essential part in the environmental pillar.

Marine Framework Strategy Directive should be added, as Soil Strategy (and need of soil directive).

We need stronger legal codes, including new mining BATs, including public participation and access to justice.

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

No, the co-operation is working already now. INSPIRE is a good tool and it should be developed.

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

The use of paper has turned down already now in many countries, and Europe can't make any real competition in pulp and bulk paper against Eucalyptus counties in Latin America and Asia. In the EU we should turn forest industry towards new products, energy and multiple use of forests (ecosystem services, storages of carbon, tourism etc.). That is why EU should develop e.g. Good Forestry Practice (cf. Good Farming Practice) under Rural development legislation to safeguard multiple use instead of clear-cut and plantations. Illegal logging makes bad competition from other countries, so we need stronger FLEGT regulation in the future.

## 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.*

In general, for EU and Member States is much wiser to invest in R&D than e.g. railways to mines. Mines and their infrastructure are usually in use only for a short time. They give more jobs for foreign cheap workers and machines than local people, and more money for multinational companies than own society. On the other side, R&D gives possibilities for worldwide consultancy and export of technology, and this money comes from other countries to EU Member States.

*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.*

The big environmental challenges of mining are bad material and energy efficiency and water questions (need of water and pollution). These big environmental challenges are also worldwide possibilities for companies. This R&D gives even more export possibilities than mining inside the EU.

*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.*

Ecoefficiency. The best euro is the saved euro.

On behalf of Uudenmaan ympäristönsuojelupiiri ry

Tapani Veistola  
nature conservation officer

19.9.2010

European Commission

Registered stakeholder n:o 3182630432-54

**Public consultation on the preparation of a new Communication on Raw Materials**

Uudenmaan ympäristönsuojelupiiri is the biggest regional branch of the Finnish Association for Nature Conservation.

Finland is just now making a national mineral strategy, but without environmental NGOs in working groups and without any SEA.

POLICY AREA: DEFINING CRITICAL RAW MATERIALS

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

We think that it is very wise to develop alternatives for rare strategic minerals, because we must think also next generations and their needs. More efficient recycling of these materials is very important.

*4. Are you aware of any initiatives in your country that aim to assess the criticality of raw materials?*

Not yet.

POLICY AREA: TRADE

EU should development partnerships with foreign countries with strategic minerals, and invest in developing their environmental standards and good governance.

## POLICY AREA: DEVELOPMENT

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

Good governance *and* environmental know-how

*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?*

Environmental standards

*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.*

Yes, also REDD+ combatting Climate Change and the loss of biodiversity, and illegal logging (FLEGT).

*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, but there may be some bilateral co-operation with e.g. Zambia.

EU should think partnerships to create a "green trade union" with high environmental standards.

## 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.*

We need ecological network to safeguard biodiversity and ecosystem services essential also for the future of our own society. Current studies show that we don't reach EU environmental targets like good status of waters by 2015 and the stop of loss of biodiversity by 2020 without stronger conservation actions and commitment from other sectors, including mining industry. That is why all responsible modern companies should keep themselves far away from Natura 2000 areas.

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

The Commission and Member States should use "stick and carrot" to safeguard Green infrastructure like Natura 2000 and other ecological networks and services: No mining licences and public money in and near conservation areas, but better possibilities for licences and financing far away of them.

*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.*

SEA Directive and public participation are needed also in policy and strategy level. Finland is making national mineral strategy without inviting environmental NGOs into working groups and without making any SEA.

Mines are only one factor in land use planning. Sometimes a site is more valuable for society in other use. It is not wise to put a mine e.g. into a groundwater area: A mine can be in use for a century, but people need water until the next Ice Age.

The environmental risks are coming also from infrastructure needed for mines, and sometimes these harms are even bigger than from a mine itself. This means that spatial regional planning is needed at least in regional level (because roads may come from one municipality to another, but another municipality may have another plans to this area than a road for a mine).

"No go" principle for Natura 2000 and other conservation areas should be an essential part in the environmental pillar.

Marine Framework Strategy Directive should be added, as Soil Strategy (and need of soil directive).

We need stronger legal codes, including new mining BATs, including public participation and access to justice.

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

No, the co-operation is working already now. INSPIRE is a good tool and it should be developed.

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

The use of paper has turned down already now in many countries, and Europe can't make any real competition in pulp and bulk paper against Eucalyptus countries in Latin America and Asia. In the EU we should turn forest industry towards new products, energy and multiple use of forests (ecosystem services, storages of carbon, tourism etc.). That is why EU should develop e.g. Good Forestry Practice (cf. Good Farming Practice) under Rural development legislation to safeguard multiple use instead of clear-cut and plantations. Illegal logging makes bad competition from other countries, so we need stronger FLEGT regulation in the future.

**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.*

In general, for EU and Member States is much wiser to invest in R&D than e.g. railways to mines. Mines and their infrastructure are usually in use only for a short time. They give more jobs for foreign cheap workers and machines than local people, and more money for multinational companies than own society. On the other side, R&D gives possibilities for worldwide consultancy and export of technology, and this money comes from other countries to EU Member States.

*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.*

The big environmental challenges of mining are bad material and energy efficiency and water questions (need of water and pollution). These big environmental challenges are also worldwide possibilities for companies. This R&D gives even more export possibilities than mining inside the EU.

*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.*

Ecoefficiency. The best euro is the saved euro.

On behalf of Uudenmaan ympäristönsuojelupiiri ry

Tapani Veistola  
nature conservation officer