



Anders Portin

19 September 2010

**FFIF answers on the Commissions Raw Material Initiative**

**Finnish Forest Industries Federation represents roughly 100 forest industry companies in Finland. We represent 100 % of the pulp and paper industry and 80 % of the woodworking industry.**

**We have registered concerning consultations and our number is 39671713910-36**

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

***The raw-material our members use is wood. This raw material has not been analysed. There are many policies which affect the use of wood, for instance the EU-policies on renewable energy. These interrelations on the availability of wood should be examined more.***

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

***The availability of renewable raw materials will be one of the big questions for mankind globally. Also on the EU level the availability and the use of wood will be immense questions both from an economic and environmental point of view.***

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

***The renewable raw materials are (almost) forgotten.***

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

***In Finland The Strategy of Natural Resources was launched a year ago and a follow up is now discussed.***

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?

***Yes definitely. For instance how the strategies to promote renewable energy affects other uses of renewable raw materials.***

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.

***Should be further discussed.***



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7. Do you think that the importance of trade is adequately reflected in the work carried out so far in the Raw Materials Initiative?

***Trade is certainly important regarding this. No specific comment regarding if it is adequately reflected or not.***

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?

***The free trade is important. Distorting subsidies should be abolished. Both within the EU and in third countries.***

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

***Russian export duties on wood***

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.

***See answer on question 4***

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

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

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 (EITI)?

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?

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 role of the forests are an integral part of the development policy.***



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***Also the EU policies regarding FLEGT (Forest Law Enforcement Governance and Trade) affects these issues.***

***A questionmark is how the strategies on renewable energy affects also the development policy.***

***Also the climate change discussions affects through the REDD-discussions.***

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?

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

***The role of wood as an renewable raw material is forgotten.***

***The availability of wood and the influence of renewable energy policies, land use policies, environmental policies etc are crucial.***

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 one to be added. Please explain.

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

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. The sustainable use of the European Forests and Wood is a crucial issue that should be further discussed in a balanced way – including the environmental, social and economic benefits.***

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:

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

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



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the highest positive impact on the security of raw materials supply for the EU industries? Please specify.

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.

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.

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?

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?