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RESPONSE TO THE QUESTIONARY

Public Consultation on the Preparation of a New Communication on Raw Materials

POLICY AREA : DEFINING CRITICAL RAW MATERIALS
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Q. 1 : Do you have any comments on the methodological approach, including the scope, to determine criticality at EU level? If so, please specify.

The methodological approach is based on the definition of "critical raw material" which is related to the economic impact of a raw material. The "economic impact" has a dynamic correlation to the "raw material" depending on a number of factors not taken in to account in the definition (e.g. technological developments).

It is needed to "revise" the list of critical raw material more frequently than every 5 years in order to anticipate unpredictable economic/ market, technological and environment factors. Alternatively the definition "critical raw material" should be re-examined.

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

Zeolite due to its widespread uses that are only recently being discovered (e.g. environmental protection) and aluminum and nickel due to sensitivity of their "behaviour" even in slight changes of the parameters of the market.

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

- o Include in the recommendation updating of the definition of "critical raw material".
- o Include in the policy actions the development of technologies and systemic approaches that would ensure minimization of raw material superfluous use at the processing/manufacturing stage (aging processing / manufacturing technologies).
- o Include the impact of the economic-marketing parameters of the 2008 global crisis.

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

No, we are not aware of any initiatives.

Q. 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?

The functioning of raw materials should be examined in the frame of an extended definition of "critical raw material".

Q. 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 of "critical raw material" should be a political decision, as most of them occur in countries outside the EU and their availability or not could affect the entire EU economy. Stockpiling should be controlled at EU level under agreement with Member States.

Stockpiling is too difficult to be realized due to availability and raw materials prices problems, as well as probable substitution problems (artificial materials, plastics, etc).

POLICY AREA : TRADE

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

We think that the importance of trade is adequately reflected in the work carried so far in the RMI. But we believe that it is very difficult to resolve all issues with general rules. There is need for further discussion.

Q. 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?

There is no comment regarding the main findings of DG Trade activity report.

The creation of an improved investment climate should be prioritized especially in Greece.

The question of sustainable raw materials supply is strongly dependable on specific needs of every country.

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

It is not relevant to the activities of the Institute.

Q. 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.

We are not aware of any initiatives.

POLICY AREA : DEVELOPMENT

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

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

The European Technology Platform for Sustainable Mineral Resources (ETP-SMR) has adopted a Strategic Research Agenda (SRA) for the European extractive industry and the involved stakeholders are committed to contribute through a major research effort to make the step change that will be required to secure critical and essential resources for Europe and achieve higher resources efficiency.

Into this framework, we strongly support the principles of the SRA and the actions of ETP-SMR. The Strategic Research Agenda provides a solid platform for necessary actions.

The European Commission and the Member States ought to support ETP-SMR through complementary funding of research as well as active involvement through a related ERANET. We are in favor of the rapid implementation of the Strategic Research Agenda that has been adopted by the ETP-SMR with respect to research development and innovation, namely optimization throughout the resources life-cycle, saving water and energy resources, an European minerals intelligence network (EMINENT).

In particular the targets-actions needed are :

- Clearly identification of topics related to this SRA in the Framework Programmes FP7 and FP8. Especially, for the FP8, the necessary actions relating to the Raw Minerals Initiative should be clearly identified in the program. The structure of the program should be suitable for the process industry where geology, intelligence technology, energy, environment and materials issues are strongly linked. We support increased transparency and simplifications how the framework programs are planned and implemented.
- R&D projects to improve methods for exploration, extraction and recycling in close collaboration between academia and industry.
- Creation of European added value through RTD-based technology leadership, education and training.
- Better education and training. Due to strong links between high quality research & development and high quality education, we endorse a clear definition of European minerals programs, a framework for funding Pan-European education, funding of mobility of students and teachers,

international networking and integration of European education with other leading schools internationally.

- Mobilization of existing research and development capabilities to enable a more efficient approach to innovation.
- Maintenance of research base, education and training for the next generations.
- Cooperation between extractive industry, governmental institutions, geological surveys and academia across Europe and future common agenda concerning research and higher education related to a sustainable supply of metallic and non-metallic raw materials.
- Support of the revival of exploration of Europe's mineral potential.
- Development of a pan-European "Europe beneath our feet" knowledge base on the geology and mineral resources, as written in the Lulea Declaration (October 2009).
- Development of innovative and sustainable production technologies.
- Implementation of best practices - new and improved high quality products and services – responding to societal needs in the 21st century.
- Reuse, recovery and recycling as well as new product applications.
- Reduced material and energy consumption per functional unit.

Q. 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 (E.I.T.I.)?

What is now known as the EITI process evolved from the first statement of the EITI Principles at the EITI Conference in 2003. The Validation methodology was finalized by the EITI Board in 2007. Still, the EITI Principles and EITI Criteria are the most concise statement of the beliefs and aims of the Initiative. These beliefs and aims are endorsed by EITI stakeholders, supporters and implementers alike.

We believe that the E.I.T.I. Principles would be properly served by incorporating to "transparency target" the notion of "coupling" appropriate technologies applied to developing countries and best available technologies – best practices already applied to developed countries to Extractive Industry Investments in countries rich in natural resources.

Q. 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?

The objectives, targets and deliverables that should be included in such a partnership should take in mind the Raw Materials Initiative (and relevant texts) and the African Mining Vision 2050.

The African Union (AU) and the United Nation Economic Commission for Africa (UNECA) in October 2008 took a major step aimed at ensuring that Africa's mineral resources contribute meaningfully to the continent's development this century by launching a 45-page draft document.

This last document (named "African Mining Vision 2050") identifies natural resources especially the mining as a key sector to spur development and industrialization of the African economy. From process to content, the Vision presents a new phase for African natural resource sector. It answers the perennial question of why Africa has not developed despite enormous natural resource endowment of the continent and its long history of mining. The vision also outlines what needs to be done to transform these natural resources into concrete development across the continent by 2050 to improve the quality of life of the average African.

The common points of the two documents, as well as the needs of the Member-States of European Union and African Continent will specify the objectives and the targets that should be included in such a partnership, such as good governance, more focus on resource efficiency in the mining and processing sector and sustainable development in the small-scale mining sector. The European Union could offer support to infrastructure and investment capitals and know-how.

Q. 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 not relevant to the activities of the Institute.

Q. 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?

We are not aware of any initiatives in Greece that contribute to promoting exploration and exploitation of mines in developing countries besides the re-formation of the Regulation of Mining and Quarrying Operation.

The mining and quarrying policy in Greece is under re-designation after a long period of immobility. The new strategic adoptions, decisions and directions-orientations will take into account the new European development platform for raw materials.

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

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

Yes, we agree.

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

No, we don't think of any other avenue.

Q. 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, we agree.

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

Yes, we strongly agree to establish an European Union Geological Service specialised on relevant issues. This service will promote the collective opinion of all EU geological institutes and facilitate the relevant directorates during the consultation period.

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

It is not relevant to the activities of the Institute.

POLICY AREA : PROMOTING SKILLS AND RESEARCH, DEVELOPMENT AND INNOVATION

Q. 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.

We believe that the best way to promote better cooperation amongst companies, universities and local authorities is to take systematic measures that create opportunities for discussions and opinions' exchange. As a paradigm we propose:

Development of common websites with controlled access, further to already existing separate sites, by:

- o Universities and research organizations;
- o Companies of the sector;
- o Public authorities.

Within the proposed site, public discussion and open dialogue may take place on issues related to the Extractive Industry.

Lists of non confidential technical / research and other matters, may be uploaded by companies and partnerships might develop to accomplished the relevant research.

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

The only known current Research framework is the National Strategic Reference Framework, and the following Programmes, more specifically:

- o Sectoral Operational Programmes:
 - Environment – Sustainable Development
 - Competitiveness and Entrepreneurship
 - Digital Convergence
- o Regional Operational Programmes:
- o European Territorial Cooperation Programmes:

Q. 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.

We believe that there is a major gap and urgent need, regarding exploitation of secondary resources and research on secondary materials treatment, due to the fact that industrial waste are of complex nature and multidiscipline approach is required in order to process them and recover secondary valuable metals/minerals, efficiently.

Q. 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.

A major action that is directly related to EU Geological Surveys is to harmonize and complete the existing information databases and create links within the different databases of the EU State Members. Information on secondary resources (waste, e.t.c.) should be assessed separately and with emphasis.

Q. 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.

In accordance with the answer to Q23, we believe that much emphasis might be given to exploitation and processing of secondary resources of raw materials.

Q. 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.

Not relevant to the activities of the Institute.

POLICY AREA : RESOURCE EFFICIENCY & RECYCLING

Q. 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?

- In depth evaluation of operating collection and turn-back systems and upgrade.
- Use of recognition signs (codes) accompanying new vehicles and electronic equipment (like batteries Hg free) traceable through life of the goods.

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

- Urgent need to inform public continuously and adjust education programmes of elementary schools with the relevant information.
- Labeling with the list of secondary materials. Signs with secondary applications.

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

Within the framework of implementation of the National Packaging Legislation and recycling of packaging materials, considerable quantities of household paper (newspapers, leaflets, paper packaging materials) is disposed mixed with other non-paper packaging material. This results in low quality of recovered paper. Re-evaluation of collection systems may be needed. Furthermore, the public is willing to participate in recycling systems, but is distrustful that the recovered materials are used for recycling or are disposed off eventually.