

POLICY AREA: DEFINING CRITICAL RAW MATERIALS

1. The two fundamental principles for the selection of critical raw materials hold the economic chain and the risk of equipment in due consideration. Other evaluation criteria of the criticism may be:

- percentage of recycled material used in place of critical raw material
- the possibility of recycling and recovery of raw materials from the finished and exhausted product

2. On the list of critical raw materials, in our opinion, should be considered water also, fundamental good for any type of activity. We are in the process of a gradual reduction of freshwater supplies distributed unequally. We think it right to support research to:

- encourage the technologies for water recovery
- optimize communication to improve the culture in regard to its use
- strengthen the argument in the international agreements to foster a more equitable and sustainable allocation.

3. Rational recommendations for the allocation of areas / fields. We must create formulas for the dialogue and the constant and indirect comparison between committees / institutions and research centers. Particularly interesting in sustainability sector: the life cycle of raw materials.

For example, we could analyze and develop in depth:

- the recycling of waste materials
- the recovery of working quarries and disused mines.

4. We know of the existence of:

a- ASPO-Italy Association, which works in analysis of the exhaustion of resources and of the spread of their research.

b-A interesting book "The risk of interruption of raw materials" by the Institute of economic studies of Luiss, analyzing the dependence of Italy on imported raw materials with its choice of provisioning sources.

c-Institut of Environmental Geology and Geo-Engineering of the National Research Council-CNR-that is using resources in the analysis of waste water treatment and recycling (disposal and storage) for the mines and quarries products, with a particular attention to geo- engineering aspects of exploration and control.

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6. In our opinion, there should be more attention on stockpiling. It's really important to think about forms of storage, valid at European level, which can ensure adequate supplies for all Member States.

POLICY AREA: TRADE

7. Yes, but less than the importance of development policies because, for example, the nature of distortion in raw material market are not deeply analysed.

8. Although bilateral and multilateral agreements are already there, the start-up of a constant and concrete dialogue with raw material rich countries is crucial in the strategy proposed by DG Trade;

- The most relevant action that should be prioritized is the enforcement of a EU common discipline on "sustainable consumption" on raw materials. EU should better promote the efficient use, the recycling or the substitution of raw material in all economic sectors by developing EC/SMSs/private and dynamic enterprises' joint actions, to reduce European import dependence in a more effective way.

- There is also a special need to increase the effectiveness of the cooperation with less developed countries and emerging economies, where is still too high the lack of development, technical support, innovation, know-how transmission and lack of policies focused on sustainable consumption and supply too high.

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10. Some of the countries with the poorest population of the world have the richest amount of raw materials of the planet, which is a big contradiction. To change this situation one must act with multiple strategies, like helping small and local companies to extract and export raw materials and, above all, minimizing the intervention of local governments. On EU level, if we would help this kind of projects giving them a fast track to the importation, we could foreshadow a real turning point.

But, of course, just for the raw materials that can be managed by small companies.

POLICY AREA:DEVELOPMENT

11. - Good governance: provide political assistance to support anticorruption initiatives; create spaces of dialogue and planning with various stakeholders at national level.

- Infrastructure/investments: improve investment institutions such as investment funds, bank, lending institutes to encourage better savings and a favorable environment for both foreign and domestic investment

12. EU should promote cooperation programs and projects that involve mining sector's companies, local governments and civil society to eliminate corruption and to fix, with other international organizations, standards and conditions under which companies and governments should operate for payments and the use of revenues, carrying out appropriate actions of control and monitoring. To achieve these objectives it is important that EU foster development project whose short term objective is the creation of "miners associations" to facilitate small miners to organize and access required financial, technical and marketing services so that they can carry out mining activities that are both economically viable and environmentally sustainable and thereby raise the standard of living miners and their families. "Miners associations" should participate to decision-making process with local institution and private companies. EU should also encourage the socially-responsible management for all European companies action and also make European governments responsible for national companies actions.

In this context the Extractive Industries Transparency Initiative can create many benefits for Government, industry and civil society. EITI is an important starting point to strengthen governance, reduce corruption and control the revenue use and redistribution to reduce poverty in resource-rich countries. EITI can improve investment climate in these countries and mining sector companies can benefit. In our view there is a lack of member countries that have an important activity in mining sector such as China, and this situation can obstruct the implementation of the initiative's aims.

13. Concrete objectives: increase relationships between big companies and small scale miners, to ensure poor people's access to land, revenue and employment

Targets: African strategic countries with commercial relations with Italy, such as Nigeria, Sud Africa, Angola, Uganda.

Deliverables: co-financing of cooperation projects in target countries with international organization such as Undp, OECD, World Bank.

14. Yes, because wood can be considered a critical raw material and a important resource for every economy. The main issues to be analysed are: sustainable use, good management and access to revenue and market regulation.

15. Not yet.

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

16. Yes.

17. Better and more focused activity of networking between companies and industries by:

- easier participation,
- better and more effective way of sharing best practices
- public-private partnership (PPP) in mining sector

18. Yes, we agree to all recommendations. They are functional to create a good strategy for raw-material exploitation and key economic sectors.

19. Yes; EU needs for common policies and requires sharing of scientific and technical knowledge and skills.

20. Yes because wood exploitation have a particular impact on environment, natural habitat and climate, and it should be safeguarded. As minerals, wood trade need rules and control system that should be developed at EU level

POLICY AREA: PROMOTING SKILLS AND RESEARCH, DEVELOPMENT AND INNOVATION

21. Our proposal is to plan stages/trainings for junior-managers, students, postgraduates and civil servants in private or public companies qualified as "sustainable" at EU level (listed in an EC register).

The aim is to transmit a "sustainable know how" that:

- enables them to be more effective, efficient, flexible and proactive in their work delivery
- builds up a new project management staff specialized in sustainable matters, proactive and "European-minded" towards the global market

22. There are many different environmental and buildings' certifications. Some of them also deal with material certification with a focus on the origin and recycled quantity. We are already very active in this field at local level (City of Rome) but we are very interested in the extension of that at EU level.

23. There is a very urgent need for:

- technical staff's training
- concrete and effective dissemination of "sustainable know-how"

"Sustainable training key-points" should be more and better implemented through the strict collaboration among SMSs/Universities/Public administrations

24 We trust very much in a "closed-loop recycling system" that would allow the full control on the entire life-cycle

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26. Considering water, it would be very useful to find an EU innovative and sustainable system for the exploitation of such an important material as water is

POLICY AREA: RESOURCE EFFICIENCY AND RECYCLING

27. Beyond the advised strategies is to be hoped that on the one hand the creation of an advisory body that grant a certification for the sold merchandise and founding people who buy it, on the other hand support and motivate the growth of a reuse market and the recover of the products. All will be supervised on an overnational istitution, such as EU level.
- 28 Statistics should indicate on the one hand the sadisfaction level of the consumer to be able to direct the technological researches, on the other hand it should illustrate the real expenses in order to promote business trade.
- 29 The recycled paper has often problems of shade. For that reason it can't be used for color printing. More than this, the use of recycled paper is not get into italian culture, so that it's not used for official documents or in professional boureau. For all this reasons one must focus on the improvement of the shade quality of the paper and on the diffusion of the recycling culture.