Public Consultation on the preparation of a new Communication on Raw Materials

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Objective

The Commission intends to adopt a Communication on the subject above by end of this year.
It will highlight the recent economic developments on the global raw material markets, show the progress made in the implementation of the Raw Materials Initiative (adopted in 2008), but also highlight remaining challenges and draw conclusions in terms of the way forward. The goal of this consultation is to gain an understanding of stakeholders' views on both the implementation of the Raw Materials Initiative (RMI) as well as gather opinions and suggestions on the potential avenues the Commission should explore in order to further progress and strengthen the Initiative, including actions at the level of EU, Member State and/or other stakeholders to address the key issues in relation to non-energy raw materials. For the purpose of this consultation "raw materials" cover all industrial raw materials including materials such as minerals, ores, aggregates, and also wood, hide and skins and other industrial raw materials with the exception of energy and food related raw materials.

State of play

In November 2008 the Commission adopted the Communication (2008) 699 "The raw materials initiative - meeting our critical needs for growth and jobs in Europe" which proposed an EU integrated strategy as a response to the different challenges related to access to non-energy raw materials. As such it tied together various EU policies, both external (e.g. external relations, trade, development) and internal (e.g. environment, competitiveness, innovation), and promoted further cooperation between the Member States where appropriate. The proposed strategy is based on 3 pillars:

1. ensure a level playing field in access for resources in third countries
2. foster sustainable supply of raw materials from European sources, and

3. reduce consumption of primary raw materials by increasing resource efficiency and promoting recycling.

In May 2009, the Competitiveness Council endorsed the major objectives set out by the RMI and invited the Commission, Member States and stakeholders to act swiftly in the implementation of various lines of action outlined by the RMI. It also welcomed the commission's intention to report back on the implementation of the RMI by the end of 2010.

The launch of the RMI coincided with the full onset of the financial and economic crisis. The evolution of the international raw material markets has confirmed the structural nature of the issues at stake and thus reinforced the need to further pursue the objectives of the RMI. Meanwhile the RMI has gathered extra momentum with adoption of the Europe 2020 Strategy that includes as one flagship "An industrial policy for the globalisation era" and that foresees the setting up of a framework for a modern industrial policy that will "address all elements of, the increasingly international value chain from access to raw materials to after-sales service".

Other related flagships are "Innovation Partnership" and "Resource Efficiency".

Work is ongoing to implement the different lines of action outlined by the RMI. On top of a series of actions undertaken in the framework of the RMI, three major deliverables have recently been released:

- Report on defining "critical raw materials at EU level[1];
- Report on "exchange of best practices in area of land use planning and permitting"[2];
- Trade activity report 2009 on raw materials[3].

Another one is the Guideline document on "Non-Energy Extractive Industry and Natura "2000" aimed to provide clarification. The Guideline document is foreseen to be published by end of July and will be also available via the web site of Environment Directorate General.

Finally, regarding the external angle of the strategy, a first milestone was achieved with the publication of DG Trade's 2009 activity report on raw materials.

1 http://ec.europa.eu/enterprise/policies/raw-materials/critical/index_en.htm
2 http://ec.europa.eu/enterprise/policies/raw-materials/sustainable-supply/index_en.htm
3 http://trade.ec.europa.eu/doclib/docs/2010/june/tradoc_146207.pdf

QUESTIONS

POLICY AREA: DEFINING CRITICAL RAW MATERIALS

Major issues:

An expert group, chaired by Enterprise and Industry DG, recently released a report[4] the 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? If so, please specify.

In principle, the methodology adopted by EU is very suitable for those raw materials depending on international trade and geopolitical issues. It fits very well for some metals and rare raw materials.

But the methodology is not able to analyse the criticality of European based raw materials where political issues related with NIMBY, land planning, and other could lead to a critical supply. Neither for aggregates – an exceptional material in terms of enormous volume consumed across Europe - where the need of a suitable /sustainable local supply confers it a critical raw material status.

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

In the absence of adequate policies, aggregate supplies may become critical in several European regions, leading to local supply deficiencies, with costly

consequential inefficiencies in raw material consumption efficiency, transport, energy consumption and efficiency, and CO_2 emissions.
Due to their bulk and weight, most minerals - aggregates in particular - should be produced close to the point of usage to minimise transport distances, CO_2 emissions, environmental impact, transport congestion and associated costs.

3. Do you have any comments regarding the recommendations of the report? If so, please specify.
First of all, we understand that the recommendations not only apply to the raw materials defined as critical but also to all the raw materials. If we are wrong and the meaning is to only develop the recommendations for critical raw materials, then we totally disagree.
Assuming the first case, sw agree with the recommendation that the list of EU critical raw materials should be updated but we think that 5 years is a too long period. An interim review could be necessary.
We also believe that the scope of the criticality assessment should be increased, in order to evaluate the criticality of other raw materials from European sources not affected by geopolitical issues and international trade.
Concerning follow up recommendations, our position is in favour of them, with some comments. Nevertheless, a more defined action plan has to be set up with specific targets, participants, responsible, and financial support:

- **We support the need to improve the availability of reliable, consistent statistical information in relation to raw materials;**
- **We support the need to promote the dissemination of this information, notably by preparing a European Raw Materials Yearbook with the involvement of national geological surveys, but also including national and regional administrations and mining/processing industries. It should focus on improving the knowledge on the availability of resources and on their flow into products through the value-added chains of the EU economies;**
- **We support the need to establish indicators of competition to land in the Member States;**
- **We support the need to encourage more research into life-cycle assessments for raw materials and their products on a "cradle-to-grave" basis; It should be highlighted into EU R+D and Environmental Programmes**
- **We support the need create a working group(s) to further analyse the impact of emerging technologies on demand of raw materials. The raw materials industry has to play an important role.**
- **We support that a sub-group of the Raw Material Supply Group of the European Commission should be set up to ensure permanent**

follow-up of this report on critical raw materials. The raw materials industry has to play an important role.

Concerning policy oriented recommendations to improve access to primary resources, our position is in favour of them. Nevertheless, a more defined action plan has to be set up with specific targets, participants, responsible, and financial support:

- We support that the findings and recommendations resulting from the work carried out by the ad hoc working group on "Best practices in the area of land use planning and permitting" with a view to securing better access to land, fair treatment of extraction with other competing land uses and to developing a more streamlined permitting processes; the procedure to do so has to be defined at EU level and strengthen enough to be applicable at national level. The legal framework has to be defined, because a simple recommendation of a ad hoc working group is too far away from the local and regional planning authorities
- We support the need to promote exploration, and ensure that exploration by companies is regarded as research activity; taxes incentives could be developed.
- We support the need to promote research on mineral processing, extraction from old mine dumps, mineral extraction from deep deposits, and mineral exploration in general, notably under EU RTD Framework Programmes;
- We support the need to promote good governance, capacity-building and transparency in relation to the extractive industries in developing countries, notably in the area of critical raw materials. Problably the same good governance, capacity-building and transparency in relation to the extractive industries has to be improved in many EU countries and regions.
- We support the need to promote sustainable exploration and extraction within and outside of the EU.

We also propose that national governments have to be encouraged to improve data collection in order to establish short-medium and long-term minerals demand and supply scenarios for the different development regions, taking into account future development plans. These may also include waterway and rail export routes to adjacent markets which lack mineral deposits. These development plans should not a priori exclude areas with Natura 2000 or similar conservation designations.

Concerning the Group recommendations with regard to trade and investment as defined in the trade raw materials strategy, we do not have a specific opinion, due to most of them are not related with our sector.

- **We support the need to continue to increase coherence of EU policy with respect to raw materials supply, for example in the assessment of injurious dumping and subsidies, not only in international trade, but also at EU level.**

In relation with Group recommendations on policy actions to be undertaken to make recycling of raw materials or raw material-containing products more efficient, in particular by:

- **We support the need to mobilise End of Life products with critical raw materials for proper collection instead of stockpiling them in households (hibernating) or discarding them into landfill or incineration; This should be extended to the other raw materials.**
- **We support the need to improve overall organisation, logistics and efficiency of recycling chains focus on interfaces and system approach; This should be extended to all raw materials. The role of primary raw materials producers has to be highlighted in order to better integrate them in the recycling procedure, because this could be a cost effective way to improve the efficiency of the scheme.**
- **We support the need to promote research on system optimisation and recycling of technically-challenging products and substances. This should be extended to the other raw materials and supported by EU R+D and environment framework programmes.**

We also support the Group recommendations related with substitution and with the overall material efficiency of raw materials.

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, in general terms.

Only in few regions, competent authorities are assessing the problematic related with aggregates supply. In those cases, a prospective study on future demand and availability of resources (authorized) has lead to a proportional relation between those factors.

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?

We do not have opinion on international raw materials markets, but we think that a deep analysis of EU internal raw materials markets should be done. The relationship between supply capacity and demand, including local aspects and logistical issues are important issues to be addressed.

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.

No opinion.

4 http://ec.europa.eu/enterprise/policies/raw-materials/critical/index_en.htm

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 reports 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?

Yes.

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?

No, because this issue is not related directly with our sector (aggregates).

9. Please identify trade distortive measures (i.e. export restrictions) concerning raw materials that in your view should be tackled.
5 http://trade.ec.europa.eu/doclib/docs/2010/june/tradoc_146207.pdf
This issue is not related directly with our sector (aggregates).

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.
This issue is not related directly with our sector (aggregates).

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:

Yes ☐Good governance;
Yes ☐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 resourcerich countries? What are your views regarding existing initiatives

currently being taken in this area, namely by the Extractive Industries Transparency Initiative (EITI[6])?
This issue is not related directly with our sector (aggregates).

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?
This issue is not related directly with our sector (aggregates).

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.
This issue is not related directly with our sector (aggregates).

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?
This issue is not related directly with our sector (aggregates).

[6] http://eiti.org/

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 Environment[7] 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 Groups[8].

- 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.

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.
In general, we agree with the conclusions of the report. Some comments related with are:

- **Even the report states that it is not advisable to seek to impose to Member States prescriptive recommendations relating to mineral planning policy the European Commission should study the legal way to raise the profile of the conclusions in order to integrate them in a document with legal value rather than a technical report.**

We fully support both the conclusions of the Leoben University Report "Planning Policies and Permitting Procedures to Ensure the Sustainable Supply of Aggregates in Europe". These are:

- **Future Demand for Aggregates in Europe**
  - **The demand for aggregates in tonnes/capita increases according to economic development in each country, reaching a plateau at very high levels of GDP/capita. Therefore once the current economic recession is over, demand for aggregates in Europe will increase steadily to a least 4 billion tonnes in the medium term.**
  - **Even with increased recycling in countries where it is so far relatively undeveloped, the total of recycled materials is unlikely to exceed 10% of total aggregate supply in the medium term. Marine and manufactured aggregates together currently comprise only 4% of total aggregate supply. Therefore future supply of aggregates in Europe (up to 85%) will still have to come from natural aggregate resources.**
  - **Due to their bulk and weight, aggregates should be produced close to the point of usage to minimise transport distances, CO2**

emissions, environmental impact, transport congestion and associated costs.

- National governments should be encouraged to establish short-medium and long-term aggregate demand and supply scenarios for the different development regions taking into account future development plans, also including natural waterway export routes to adjacent markets which lack aggregate deposits. These development plans should not a priori exclude areas with Natura 2000 or similar conservation designations.
- There is also a general need to progressively fill gaps in the geological knowledge of aggregate deposits in the Member States.

- Minerals (aggregates) policy at EU- and national level
  - Only few Member States have a clear structured National Minerals Policy. This issue is affecting both minerals planning policies (strategic and operative level, minerals mostly not considered in the planning process) and also the permitting processes (inefficient, ineffective and time-consuming).
  - To implement a National Minerals (Aggregates) Policy in Member States is crucial. Each National Minerals Policy must
    - Create an awareness of society's dependence on minerals, and specifically for aggregates, and in the case of aggregates of the need for access to local resources.
    - Point out the importance of the secure supply of minerals, and specifically of aggregates, for society, and promote a balanced approach in the assessment of conflicting interests between minerals development and other land use issues.

- National (Regional and Local) minerals (aggregates) planning policy
  - Aggregates are not considered in land use planning in most countries, and even where they are, there is an unbalanced pre-disposition against aggregates extractive activities, which needs to be clearly addressed.
  - Generally speaking, aggregate resources are not mapped in detail unless the local aggregates association has specifically made inputs to the national or regional development plans, and even when this has been done, access requirements can sometimes be ignored by the planning authorities, a situation which needs be addressed and rectified.
  - Minerals planning policy should address strategic (minerals) planning (if possible at national or at least regional level) and

operative (minerals) planning based on land use plans. At strategic level it should be decided which planning strategy will be the best one for a country. At regional and/or local level land use plans shall include aggregates by taking into account the specific issues of the aggregates industry. The planning horizon shall be both mid-term and long-term to ensure that access to local resources is really secured. This is the crucial issue of aggregates planning policy.

- National, regional and local coordinated aggregates planning policies need to take account of:
  - Local geology, whether or not hard rock or sand & gravel are present geologically (at surface, as underground mining is generally not commercially viable for such materials).
  - Whether the deposit is of adequate quality, ideally based on some exploratory boreholes.
  - Whether or not there is adequate physical unoccupied land surface area over and near (for access routes) these deposits.
  - Whether or not the deposits are in potentially sensitive areas due to being protected areas (Natura 2000) or of high scenic/amenity value, though such designations do not a priori prohibit aggregate extraction activities.
  - Distance from urban, highly populated or industrial areas where there would be large aggregates demand.
  - The road, rail or waterway infrastructure for transporting the aggregates from the point of excavation to the point of usage.

- Effective permitting procedure
  - Only a few Member States link their permitting procedures to land use plans.
  - Few Member States have efficient and timely "one-stop-shop" permitting systems. In many Member States, multi-body permitting regimes exist for historical reasons, often with differing perspectives and areas of responsibility.
  - The authorisation process is complex and very slow in most countries, taking typically 5-10 years to obtain authorisation for a new production site, and furthermore permissions are often granted for only similar timescales, too short to justify capital investment.

- **In some countries, deficient or inconsistent permitting systems can allow unpermitted operators to thrive: any such deficiencies or inconsistencies need to be rectified.**
- **All permitting considerations have to be linked to the geological presence of aggregates, and the physical ability to get access. In principle, each Member State should have a permitting system that allows efficient and timely granting permissions for projects, which entails:**
  - **Clear and appropriate legislative structure, with clear designation of authorities and competences.**
  - **Rationalised application process through one authority (as a "one-stop-shop"), or at least well co-ordinated procedures between all authorities if there are several. It is important that local authorities are included in this process, which even if not involved by law, is inherently included as interested parties under EIA procedures.**
  - **Time-limited procedures for clarification by all stakeholders of applications, such that the overall process has to be completed within a 3 year timescale (there are many situations now which take 10-15 years, which few companies can afford).**
  - **A reasonable balanced approach conserving the environment, biodiversity, etc, but equally recognising the need for aggregates, and the regional benefits created. Extraction projects should have at least the same importance as other spatial interests, and in no case should extraction by prohibited a priori even in protected areas. Project decisions should generally be taken at a high level, the evaluation balanced in the broader public interest.**
  - **When granting permissions, for hard rock quarries a 50-year timescale should typically be considered. No permissions should be less than 15 years otherwise the major capital investment cannot be justified. Even in such cases, renewals for similar periods should be anticipated from the outset. For sand & gravel pits, the planning timescale should be 15-30 years depending on the scale of the deposit, with further renewals anticipated also proportionate to the scale of the deposit.**
  - **Permitting authorities should be acutely aware of the potentially sterilising effect of granting permission for even a single dwelling or other building on or close by to a planned or actual quarry or pit area.**

- **Whatever planning system is used, fixed timescales should be set by which planning authorities must come to decisions. In some countries, the system can be stretched almost indefinitely by planning authorities by a last-minute need to seek further data, inappropriately resetting the timescale of steps within the process. There needs to be an appeal process at the highest level, determined by experts in the fields concerned, who can make objective decisions away from politics.**
- **In each country, it is useful to provide organisational charts related to land use planning and permitting process. Based on such a schematic diagram, structural issues of efficiency and inefficiency can be discussed and improvements made.**

In general the conclusions of the report are a little bit weak and imprecise. We could reinforce them including the conclusions of the European Minerals Conference Madrid 2010, that we copy below:

I. Future Demand for minerals, in Europe

The industry calls for:

(i) National governments to be encouraged to improve data collection in order to establish short-medium and long-term minerals demand and supply scenarios for the different development regions, taking into account future development plans. These may also include waterway and rail export routes to adjacent markets which lack mineral deposits. These development plans should not a priori exclude areas with Natura 2000 or similar conservation designations.

(ii) Steps to be taken to progressively fill gaps in the geological knowledge of mineral deposits in the Member States.

II. Minerals policy at EU – and national level

The industry calls for:

(i) For national minerals, policies to be implemented in Member States and integrated into other policy areas. Each national minerals policy to

a) Create awareness of society's dependence on minerals and of the real need for access to local resources.

b) Point out the importance of the secure supply of minerals for society, and promote a balanced approach in the assessment of conflicting interests between minerals, development and other land use issues.

III. National regional and local minerals, planning policies

The industry calls for:

(i) **Minerals planning policies to address strategic minerals planning (if possible at national or at least regional level) and operative minerals planning based on land-use plans. At strategic level it should be decided which planning strategy will be best for a country. At regional and/or local level land use plans should include minerals by taking into account the specific issues of the minerals industry. The planning horizon should be both mid-term and long-term to ensure that access to local resources is sustainably secured. This is the crucial issue of minerals planning policy.**

(ii) **National, regional and local coordinated aggregates planning policies to take account of:**

a) **Local geology, also in relation to economic viability;**
b) **Whether the deposit is of adequate quality (ideally based on some exploratory boreholes);**
c) **Whether or not there is adequate physical unoccupied land surface area over and near (for access routes) these deposits;**
d) **Whether or not the deposits are in potentially sensitive areas such as in protected areas (Natura 2000) or are of high scenic/amenity value, though such designations do not a priori prohibit extraction activities;**
e) **Distance from urban, highly populated or industrial areas or infrastructural projects where there would be large demand;**
f) **Road, rail or waterway infrastructure for transporting the mineral and aggregates from the point of excavation to the point of usage.**

IV. Effective permitting procedure

The industry calls for:

(i) **All permitting considerations to be linked to the geological presence of minerals and the physical ability to get access; There is a need for a permitting system at member State level that allows efficient and timely granting permissions for projects, entailing:**

a) **A clear and appropriate legislative structure, with clear designation of authorities and competences.**
b) **A rationalised application process through one authority (as a "one-stop-shop"), or at least well co-ordinated procedures between all authorities if there are several, avoiding duplication of requirements or procedures. It is important that regional and local authorities are included in this process, which even if not involved by law, is inherently included as interested parties under EIA procedures.**
c) **Time-limited procedures for clarification by all stakeholders of applications, such that the overall process has to be completed within a 3 year timescale (there are many situations now which take 10-15 years, which few companies can afford).**

d) **A reasonably balanced approach conserving the environment, biodiversity, etc, but equally recognising the real need for minerals and the regional benefits created. Extraction projects should have at least the same importance as other spatial interests, and in no case should extraction be prohibited a priori even in protected areas. Project decisions should generally be taken at a high level, the evaluation balanced in the broader public interest.**

e) **When granting permissions, for mines or hard rock quarries a 50-year timescale should typically be considered. No permissions should be less than 15 years otherwise the major capital investment cannot be justified. Even in such cases, renewals for similar periods should be anticipated from the outset. For sand & gravel pits, the permission timescale should be 15-50 years depending on the scale of the deposit, with further renewals anticipated also proportionate to the scale of the deposit. When granting permissions, the duration of these should always be in line with the lifetime of the deposit, as sustainability requires extraction of the total deposit.**

f) **Permitting authorities should be acutely aware of the potentially sterilising effect of granting permission for even a single dwelling or other building on or close by to a planned or actual quarry or pit area.**

g) **Whatever planning system is used, fixed timescales should be set by which planning authorities must come to decisions. In some countries, the system can be stretched almost indefinitely by planning authorities by a last-minute need to seek further data, inappropriately resetting the timescale of steps within the process. There needs to be an appeal process at the highest level, determined by experts in the fields concerned, who can make objective decisions away from politics.**

h) **In each country, it is useful to provide organisational charts related to land use planning and permitting process. Based on such a schematic diagram, structural issues of efficiency and inefficiency can be discussed and improvements made.**

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

Yes.

7 http://ec.europa.eu/environment/nature/natura2000/

8 http://ec.europa.eu/enterprise/policies/raw-materials/sustainable-supply/index_en.htm

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

No opinion.

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 July9.

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.
In Spain the framework already exist to have a better cooperation between companies and Universities.
Some taxes exemptions for companies funding skills programmes would be very helpful.

Research, Development and Innovation:

22. Are you aware of any research, development and innovation programme(s) at national, regional or local level? Please specify.
Yes, but not specifically focused on raw materials (Innoempresa, ...).
Specific programmes on raw materials have to be developed integrated into EU Frameworks Programmes.

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.

- **Resources efficiency / technical aspects related with extraction / treatment and distribution**
- **Product ecoeficiency**
- **Environment performance**
- **Life cycle**
- **Recycling**

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.
For critical raw materials, we do not have an opinion.
For other raw materials, research and innovation action are indirectly related with the security of raw material supply. Then we don't see a major action but a combination of different actions (see answer to question 23).

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.
See answer to question 23

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.
No opinion.

9 http://cordis.europa.eu/fp7/dc/index.cfm

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?
No opinion.

28. In what ways should statistics on trade in, and recycling of, products containing secondary raw materials be improved?
Yes.
Related with recycling, since there is no other specific place to make a comment, we would like to highlight the need to improve overall organisation, logistics and efficiency of recycling chains focus on interfaces and system approach extended to all raw materials.
The role of primary raw materials producers has to be highlighted in order to better integrate them in the recycling procedure, because this could be a cost effective way to improve the efficiency of the scheme.

29. Have you identified major problems with recovered paper? What are the main issues that need to be further analysed?
No opinion.