

EUROPEAN RAW MATERIALS INITIATIVE PUBLIC CONSULTATION

RESPONSE BY THE CONFEDERATION OF BRITISH INDUSTRY MINERALS GROUP

The CBI Minerals Group (CBIMG) represents all the major land based mineral extraction industries in the UK.

Its membership spans the two major extraction sectors by tonnage, aggregates and coal and also the high value sectors of silica sand, cement, china clay, ball clays and other industrial minerals such as gypsum and fluorspar.

This represents virtually all of the 350 million tonnes per annum of land-won minerals currently extracted in the UK.

The CBIMG represents some 500 minerals extraction companies either directly by being members of the Group or indirectly through sector trade associations.

The CBIMG has three principal aims:

- To promote the role and importance of the UK minerals industry.
- To champion the UK Mineral Industry's ability to meet the development needs of the economy in a sustainable manner.
- To influence proposed UK and EU legislation and regulation which significantly affects the Minerals industry and its licence to operate.

The UK is fortunate in that we have a good geological and statistical knowledge base thanks to the work undertaken by the British Geological Survey over the years and the cooperation between the industry, the mineral planning authorities and Government. There are concerns that, with the current round of spending cuts and the move towards a 'bottom up' approach to making planning decisions under the Government's localism agenda, this position is under threat.

We strongly support the European Raw Materials initiative and welcome the opportunity to participate in this public consultation.

For further details about the CBI Minerals Group visit:

Bob Le Clerc Executive Secretary CBI Minerals Group Business Environment

DL: +44 (0) 207 395 8059 **E:** bob.leclerc@cbi.org.uk

CBI Centre Point 103 New Oxford Street London WC1A 1DU

T: +44 (0)20 7379 7400 **F:** +44 (0)20 7240 1578 **W:** www.cbi.org.uk

Director-General: Richard Lambert President: Helen Alexander CBE

The CBI Minerals Group answers to the questions raised in the consultation are as follows:

POLICY AREA: DEFINING CRITICAL 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.

We strongly welcome this work but its scope was inevitably restricted by the quality of data available. We would have liked to have seen the range of materials broaden.

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

Potash- it is in high and increasing demand and there are only a limited number of known deposits.

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

We think 5 years is too infrequent for updating the EU critical raw materials list to take account of new technologies and changing markets.

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

The UK Department of Environment, Food and Rural Affairs (Defra) has commissioned a 'Review of the Future Resource Risks Faced by Business and an Assessment of Future Viability' (this has not yet reported) - see

<http://randd.defra.gov.uk/Default.aspx?Menu=Menu&Module=More&Location=None&Completed=2&ProjectID=17161>)

This work is being undertaken as part of the Sustainable Consumption and Production Programme. Among the natural resources being looked at are aggregate minerals which are of particular interest to this Group.

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?

No comment

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.

This needs to be investigated and researched further before a conclusion can be reached. The storage of some raw materials could pose technical difficulties due to natural breakdown when exposed to air over prolonged periods.

AREA: TRADE

CBI Minerals Group comment

This policy area does not come within the terms of reference of the CBI Minerals Group so we have not commented on this section.

POLICY AREA: DEVELOPMENT

CBI Minerals Group comment

We strongly believe that the Commission should encourage Member States to give priority to enabling access to indigenous EU Member State raw materials before considering supply options from overseas. Strategic minerals resources, including some rare earth minerals occur in EU Member States and the options for securing access to these materials need urgent consideration. In other respects, this policy area does not come within the terms of reference of the CBI Minerals Group so we havenot answered the specific questions.

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

Questions:

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

Yes. We believe the policy framework developed in this country has works well as a means of applying sustainability principles at a national level and for ensuring an adequate and steady supply of minerals. The system requires a good evidence base to work and the procedures for data collection developed in this county has provided this evidence base.

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

No

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.

Yes – we strongly agree that a robust National Minerals Policy is essential to set the strategic framework to ensure an adequate and steady supply of essential raw materials in Member States.

While we support the principles of sustainable minerals policy, we believe there is a need for the balance between the three pillars of economic, environmental and social requirements to be assessed to give the appropriate weight to economic aspects.

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

No – member states should be encouraged to develop and maintain their geological service but there is no need for an EU wide service. Cooperation already exists through EuroGeoSurveys which we believe is sufficient.

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 comment

POLICY AREA: PROMOTING SKILLS AND RESEARCH, DEVELOPMENT AND INNOVATION

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.

We would draw your attention to the work of the UK Minerals Forum which is funded by the CBI Minerals Group. The results of this work will be reported to our Conference Living with Minerals 4 the theme of which will be “Shaping UK Minerals Policy – Globalism to Localism”, to be held in Central London on the 7 November 2011.

Further details about the work of the UK Minerals Forum can be obtained from:

- www.ukmineralsforum.co.uk

Research, Development and Innovation:

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

We would draw you attention to:

- The Minerals Industry Research Organisation (MIRO)
<http://www.miro.co.uk/>
- The knowledge exchange funded by the Natural Environment Research Council
<http://www.nerc.ac.uk/using/introduction/>

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.

Improved communication with the public regarding the importance of raw materials and making the link between the products on which the public depend and the raw materials needed for their manufacture.

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.

Research on setting up improved data collection and reporting across Member States

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.

No comment

26. Are there any other aspects related to skills, R&D and innovation for other raw materials, such as wood, that needs to be further promoted? Please, specify.

No comment

POLICY AREA: RESOURCE EFFICIENCY & RECYCLING

CBIMG Comment

Our focus is on the recycling of aggregate and industrial minerals. The UK has an excellent record in the recycling of construction and demolitions materials for the production of aggregates. We believe more can be done at a European level to remove legislative barriers that act as a disincentive to recycling, recovery and reuse. (see Q.27 below)

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?

We are pleased to see, in respect of the revised Waste Framework Directive, the Commission's recent announcement to begin implementing a Commission Regulation establishing end-of-waste criteria for iron, steel and aluminium scrap metal; and a Commission decision under Article 11(3) establishing rules on the application and calculation methods for verifying compliance with the Article 11(2) recycling and recovery targets. However, there remain conflicting messages with regard to the publication of EU level guidance, creating uncertainty for business. CBI would request greater transparency with regard to timescales on any future implementing measures.

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

We think there is an urgent need to improve the level of data collection on recycling of non municipal waste materials, those containing secondary raw materials across Europe and for this to be done in a manner that allows the data to be compared across member states.

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

No comment