IMA Europe

Industrial Minerals Association - Europe

POSITION PAPER ON THE COMMUNICATION FROM THE COMMISSION "TOWARDS A THEMATIC STRATEGY ON THE SUSTAINABLE USE OF NATURAL RESOURCES" COM(2003)572 FINAL

Introduction

Industrial Minerals (IM) are natural mineral rocks used as raw materials or functional additives in a wide range of manufacturing and other industries. The main IM are: calcium carbonates, dolomite, borates, diatomite, kaolin, plastic clays, bentonite, feldspar, silica and talc. IM have a wide range of applications, including paint, electronics, metal casting & foundry, paper, plastics, glass, ceramics, detergents, drugs & cosmetics, construction materials, to mention just a few. They are also employed as processing aids e.g. in filtration, and are increasingly important in environmental engineering.

In most, if not all of these uses, IM are essential, not just desirable. The EU manufacturing industry – automobiles, aerospace, telecoms, construction sector, just to name a few, absolutely needs these IM inputs. Thus their availability is of fundamental strategic importance. This fact means the IM industry has an importance way beyond its own asset and employment base.

Unlike other mining sectors, the European IM industry and its markets are largely self-sufficient. The European IM sector is present in all of the EU member States and Acceding Countries, from the very north of Scandinavia to the Mediterranean Coast. The IM industry is mainly composed of small and medium-sized enterprises (SMEs). However, it also includes the world's leading international production companies.

The European bentonite, borates, calcium carbonate, diatomite, feldspar, kaolin, plastic clays, silica and talc producers - Members of IMA-Europe - operate more than 650 mines and quarries and 600 plants throughout Europe. They offer direct employment to some 40.000 people and process an annual volume of some 100 million tonnes of IM, contributing a value of around € 10 billion to Europe's gross domestic product (GDP). If downstream industries such as glass, foundries, ceramics, paper, paint, plastic, etc. are included, these figures are several orders of magnitude greater. With regards to the Acceding Countries, the non-energy extractive industry as a whole directly provides 1 million jobs and approximately 4 millions jobs in downstream industries.

The future of the non-energy extractive industry

The non-energy extractive industry is facing a number of challenges, such as public perception, limited access to land, skill shortage, competitiveness and environmental impact. From an environmental point of view, extractive operations raise two types of concern:

1. The use of non-renewable resources may mean that these will not be available for future generations;
2. Extractive operations can have a lasting negative impact on the environment if not correctly planned and managed.

Article 8 of the European Commission's Sixth Environmental Action Plan (6EAP) establishes the following priorities on the sustainable use and management of natural resources:

1. An estimate of materials and waste streams in the Community;
2. A review of the efficiency of policy measures and the impact of subsidies relating to natural resources and waste;
3. The establishment of goals and targets for resource efficiency and the diminished use of resources, decoupling the link between economic growth and negative environmental impacts;
4. The promotion of extraction and production methods and techniques to encourage eco-efficiency and the sustainable use of raw-materials, energy, water and other resources;
5. The development and implementation of a broad range of instruments including research, technology transfer, market-based and economic instruments, programmes of best practice and indicators of resource efficiency;

National planning regulations and mining laws regulate the opening, the management and the closure of mining and extraction operations. With these in mind, the IM industry, as part of the non-energy extractive industry, is involved in a series of voluntary initiatives and legislative processes to address the fore mentioned challenges. Amongst these we can identify:

Sustainable Development (SD) Indicators – DG Enterprise Voluntary Scheme

The IM industry strongly supports the drive towards SD. In this respect, the EC's Communication promoting SD in the EU non-energy extractive industry - COM (2000)265 final - has given further impetus to the process of integrating SD in the policies of our sector. This Communication invited Member States (MS), industry and other stakeholders to actively participate in the development of a framework to improve dialogue. Following this Communication several legislative initiatives were launched by the EC to improve the environmental legislation, focussing, in particular, on accident prevention and waste management. In 2000, as a first step towards improving dialogue between stakeholders, and increasing the transparency of the industry, the EC set up a working group to develop Sustainable Development Indicators (SDI) for the sector, the first voluntary initiative of its kind, plus a system for collecting, reporting and publishing the data.

The IM sector played a key role in the Working Group and submitted an SD Strategy document to the EC in reply to the Communication.

Since the launching of this data collection exercise, the IM industry has been very active. The primary purpose of this voluntary initiative is to provide an interim assessment of the European progress toward its sustainability goals in relation to non-renewable resources. The outcomes of this initiative are intended for several stakeholders, amongst them the general public including NGO's who are concerned with mining activities in order for all involved to better address the industry's needs and constraints. The first SDI report (2001 data) is available on DG Enterprise's internet site:

http://europa.eu.int/comm/enterprise/steel/non-energy-extractive-industry/sd-indicators.htm

Mining waste

The Commission's proposal for a Directive on the management of waste from the extractive industries – COM(2003)319 - aims to put in place measures, procedures and guidance to prevent or reduce any adverse effects on the environment, and any resultant risks to human health, brought about as a result of the management of waste from the extractive industries.

Industry acknowledges and supports the development of EU legislation on the management of mining waste as it will address the gap created by the Waste Framework Directive and the inadequacy of the Landfill Directive. The various sectors of the Non-Energy Extractive Industry have collaborated closely to contribute with other stakeholders to the parliamentary debate.

Best Available Techniques (BAT)

Following the EC's Communication on the Safe Operation of Mining Activities - COM(2000)664 - the BAT Reference document was elaborated, based on an exchange of information between MS and the mining industry. This soon to be published document covers activities related to mineral processing, tailings and waste-rock management of ores that have the potential for strong environmental impact. The intention is to raise awareness of best practice across all activities of our sector.

NESMI

NESMI is the European Thematic Network on mining and mineral processing. It is supported by the European Commission within the 5th Framework Programme. NESMI provides a Community Platform for dissemination and information of up-to-date knowledge and RTD activities across Europe. This interactive Network represents 43 Partners and a continuous increasing number of Associated Members from different European Countries.

Site restoration

The planning, opening, managing, and closing of a mine, quarry or open pit are all part of a detailed plan, in which there is no room for vague intentions. Legally binding conditions are placed on the extractive enterprises as a result of this planning. The improvements achieved by the IM industry, in environmental protection, are so important that mines, quarries and open pits are now seen as one of the significant developers of habitat variety and biodiversity. Examples are numerous where quarries and open pits, during exploitation or after closure, have become sites of prominent biological interest, having helped in saving endangered species, or having created new habitats where species otherwise not present can settle. They have become havens from urban and

agricultural land use. This role is likely to grow in the context of increasing social pressures on land planning and use. A case in point is the *Naturpark Pollauer Tal*, part of the Rabanwald talc mine in Austria.

The industry does the utmost to limit the visual impact of its activities. This impact is limited in space and time and the restoration of sites - which provides nature reserves, recreation zones… - is already developed in the planning phase.

One example of a very successful IM site restoration project is the Eden project. Eden is set amongst the plastic clay country just East of St Austell, in the SW of England. It receives on average 1.8 million visitors per year. The Eden Project provides employment, 95% of its current staff were recruited locally. It generates substantial economic and other benefits for the region. It acts as a major educational and research resource and is already working in partnership with local schools, colleges and universities.

More information on the way the non-metallic extractive industry actually operates can be found in the "Good Environmental Practice in the European Extractive Industry: a Reference Guide". The initiative for producing this guide arose from co-operation between the Enterprise Directorate General of the EC and the main trade associations of the sector. In 2001, IMA-Europe and EuroGypsum (the Association of European Gypsum Industries) published an excerpt of the guide with examples from the industrial minerals and gypsum industries (can be downloaded from our internet site).

Recycling and recovery

As explained previously, IM have many essential and beneficial uses. In the various processing phases, IM are transformed into everyday goods, from glass and ceramics (up to 99% of IM) to paper (up to 30% of talc, bentonite, kaolin and calcium carbonate).

Once these IM have undergone chemical/physical transformation through processing, they can never be recovered in their pristine form. However, there are well documented examples of established recycling schemes such as paper and glass. In 2001, 740.000 tonnes of glass was melted in the UK reducing the industries use of 900.000 tonnes IM while for the EU in 2002, 59% of the glass packaging consumed was collected for recycling[1]. Nowadays, recovered paper forms more than 40% of the raw materials used in the European paper production[2]. Both industries aim at increase their recycling levels in the coming years and this will further reduce the need for virgin raw materials.

IM contribute to the recycling of paper and glass through recovery operations and thus help alleviate the use of natural resources.

Social implications

IM management performance has improved significantly in the equally important social dimension of Sustainable Development also. As evidenced by the first round of data gathering and reporting of the SD Indicators scheme many IM operators are engaging with their host communities. The stated goal of much of this engagement is to produce lasting positive outcomes for local communities both during and after the IM activity.

1 FEVE : Fédération Européenne du Verre d'Emballage
2 CEPI : Confederation of European Paper Industries

Decoupling and the Lisbon Strategy
In March 2000, the European Council met in Lisbon and set out a ten-year strategy to make the EU the world's most dynamic and competitive economy. The Lisbon Strategy is a commitment to bring about economic, social and environmental renewal in the EU. Furthermore, the EU remains highly dependent on imports for its raw materials supply and is the world's largest consumer of minerals. In the Communication on the natural resource strategy, the EC states that “predictions about global scarcity have turned out to be unfounded”. More so, it stresses the importance of economic scarcity and security of supply.

This Communication recognises that relative decoupling of materials use and economic growth has been achieved in the EU. The IM industry is working towards resource efficiency and further reduction of resource use through voluntary initiatives and the promotion of eco-efficient techniques (see BAT). As efficient use of resources is driven by competitive issues, voluntary approaches and internal management plans seem to provide good tools for improvements.

The IM industry fully supports the acceleration of relative decoupling but it has to be recognised that we live in “material world”. A dynamic and competitive economy will involve making and building things; spaceports, satellites, home and business electronic gadgets, hydrogen powered vehicles, solar/wind powered homes and factories. Certainly we can and must push eco-efficiency to higher and higher factors, but goods will always be there alongside services.

Towards a Thematic Strategy on the Sustainable Use of Natural Resources

Concerning the scope of the foreseen strategy, it seems that all stakeholders are not involved in the elaboration process. Due to the short time scale imposed by the EC (3 meetings to write this overarching strategy), it seems that the scope is too large and that the issues should be prioritised.

The EC should give more information on the links between this strategy and other legislative initiatives - such as the Lisbon Strategy, the Soil Strategy COM(2002)179 final, land planning - and how the cross-over is being organised. The communication on “Planning and Environment - the territorial dimension” planned by the EC for 2003 has been delayed to an un-specified date. It should be recalled that the occurrence of raw materials is site specific and that there are limitations to the choice of the extraction site. In land planning, extraction sites are always low on the priority list of the authorities. This is inconsistent with the strategic goals of the European Union.

In its Resource Strategy Steering Committee meeting report (27 January 2004), the EC states that the focus of the foreseen strategy should be on the potentials for change rather than on the current problems. As a note of warning, stakeholders are told that they will be expected to provide verified and reproducible data. Finally, as an introduction to the work ahead, the EC confirms that it will draft the Resources Strategy if the Working Groups do not deliver useful material, whatever ‘useful’ is considered to be.

It is perhaps inevitable that the extractive sector is attracting such attention from the EC in the context of SD, following the two tailings dam failures at metalliferous mining sites in Spain and Romania. It would be prudent however to keep in mind that natural

resource management in other areas, e.g. agriculture, fisheries, forestry, energy, transport and urbanisation far outweigh the significance of the non-energy extractive industry in their economic, social and environmental effects.

Conclusions

Scarcity of IM resources is not an issue but security of supply could be a threat to the EU economy and more should be done to protect the European IM industry. More so, proper management, legislation/regulations, voluntary initiatives, monitoring, the promotion of BAT and the development of research instruments can reduce or even eliminate negative environmental impact and even generate improvements. Therefore, the IM industry sees no need for further legislative measures before a significant delay has elapsed and an assessment of the positive impact of the above measures has been carried out.

More so, the IM industry has already incorporated the priorities of the EC's 6EAP. Therefore, it would encourage the development and the implementation of economic incentives and other non-regulatory approaches to promote the sustainable use of IM resources. It would also support co-ordination of policies, assessment of existing legislation/regulations, and reinforced competitiveness with long-term objectives.

Finally, regulating the use of natural resources may lead to serious unwanted side effects, such as the disruption of the free market, preferential selection of products with superficially lesser environmental impacts, without full evaluation of societal benefit or risks presented by alternative materials.

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