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Europäischer Gesteinsverband  
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Brussels, 4 April 2011

**Subject: Consultation on the 6<sup>th</sup> Environmental Action Program (EAP)**

Dear Commissioner Potočník,

We would like to submit some comments on the 6<sup>th</sup> EAP from the very practical perspective of UEPG, the European Aggregates Association, representing members from 26 countries. Some 3 billion tonnes a year of crushed stone, sand and gravel are produced by 16,000 companies (mostly SMEs) from 24,000 locations across Europe, currently employing about 300,000 people.

Looking back, the 6<sup>th</sup> EAP will have covered a period from 2002 where the EU grew from 15 to 27 Members, and where the European economy grew strongly in parallel up to 2007. Since then, our industry has suffered hugely from the economic crisis, and the 2011 EU aggregate production will overall be 20% down on the levels of 2007, with much steeper production cuts in the peripheral and central European countries. Employment will have fallen by about 30%, meaning the loss of 100,000 jobs. We hope that the industry will return to growth in 2012, but fear that the recovery will be very slow and weak.

In parallel, however, the aggregates industry has made huge progress in environmental stewardship, driven not only by the legislative initiatives of the 6<sup>th</sup> EAP, but also by the much greater industry voluntary commitment to Corporate Social Responsibility in partnership with its many stakeholders. The industry has generally reached a level of environmental performance that might only have been dreamt of in 2002, though it would be the first to admit that much more needs to be done.

The Sustainable Development Strategy envisaged in the 6<sup>th</sup> EAP has moved on, and it is worth commenting on its four pillars briefly:

- The debate on Climate Change action has correctly moved to a global level. The aggregates industry has indeed an extremely small Carbon footprint, the main emissions potentially arising from truck transport. The minimisation of transport distance is very much part of UEPG's campaign for access to local resources under the Raw Materials Strategy. Likewise the Resource Efficiency Initiative is promoting more recycling, again reducing the Carbon footprint. These two initiatives have in fact taken over from the 6<sup>th</sup> EAP in a way more appropriate to our industry.
- In terms of Nature and Biodiversity, you are well aware of the huge dedication of our industry to Biodiversity, having written the introduction to our 2010 Sustainable Development Awards brochure. You are also aware that we were the first industry to sign up to Countdown 2010, and then the first to sign up to the B@B Platform. We were also heavily involved in the drafting of the EC Guidelines on Natura 2000 for the Extractive Industry. We await the EC Biodiversity Strategy, which will lead the way forward for European industry on Biodiversity, and UEPG will continue to be very actively supportive.

- In terms of Health and Quality of Life, UEPG continues to be very actively engaged with Health and Safety issues in the industry. For example, UEPG was a signatory to the ESDA on voluntary reduction of exposure Respirable Crystalline Silica, and has achieved huge success in increasing the industry participation. Likewise UEPG is strongly focused on accident and fatality elimination, which remains a great challenge for our industry. In terms of Air and Water quality, the aggregates industry has made huge improvements since 2002 in reducing particulate emissions and in ensuring that water usage is minimised and any discharges are clean, and that work goes on. While the REACH initiative did not directly concern our low-impact industry, it did require an inordinate amount of administrative and lobbying efforts to ensure there no adverse and unnecessary impacts on our operations.
- In terms of Natural Resources and Waste, as mentioned above, UEPG is strongly committed to recycling. Yet the development of higher levels of recycling has been frustrated by completely unnecessary arguments about what constitutes a “product”, “by-product” and “waste”, with the associated practical constraints. Likewise the transposition of the Waste Framework and Mining Waste Directives has necessitated a huge amount of lobbying that should be completely avoidable, if the realities of our quarrying industry were better known and understood.

Overall, the purpose of this note is to give you a greater awareness of the practical implications of the 6<sup>th</sup> EAP for a basic, but very important industry. We hope that there is an increasing understanding within the Commission that while the 6<sup>th</sup> EAP and its associated initiatives were well intended, the detailed practical implications can be unnecessarily burdensome for an economically depressed industry, struggling to maintain viability and jobs. Therefore we would urge greater understanding and support from the Commission in the areas (such as in the Raw Materials Strategy) that really matter to the future sustainability of our industry.

From our perspective, the logical thing to do would be to let the 6<sup>th</sup> EAP run for another 5 years, the Commission taking a more positive and proactive role in helping the industry adopt the initiatives still coming through on the 6<sup>th</sup> EAP, and those that are now taking over (such as the Biodiversity Strategy). We would believe that it is not appropriate to consider a 7<sup>th</sup> EAP until all the current objectives have been well achieved and Europe and the industry have hopefully returned to economic growth.

Yours sincerely,



Jim O'Brien,  
President.



Antony Fell,  
Secretary-General.