

The European Raw Materials Alliance (ERMA): Securing a safe and sustainable access to essential and strategic ‘non-critical’ raw materials

Statement by Associations of the Non-Energy Extractive Industry Panel (NEEIP)

Massimo Gasparon

Director of the European Raw Materials Alliance at EIT Raw Materials GmbH

Europa Center

Tauentzienstraße 11

10789 Berlin

Germany

Brussels, 18 May 2021

Dear Mr Gasparon,

The Non-Energy Extractive Industry Panel (NEEIP¹), represents European associations from extractive and processing industries including aggregates, cement, ceramics, gypsum, industrial minerals, natural stone and metal ores. Several NEEIP associations are also partner of the European Raw Materials Alliance (ERMA) and took note of its vision to secure access to critical and strategic raw materials, advanced materials, and processing know-how for 14 EU Industrial Ecosystems under the EU recovery plan and the updated Industrial Strategy. Besides ERMA’s focus on investment channel for raw materials projects **we would like to remind you of the following objectives announced by ERMA**, mainly to:

- Identify and respond to raw material challenges along industrial ecosystems and within the wider society;
- Provide tailored solutions to industry needs;
- Unlock regulatory bottlenecks;
- Promote stakeholders’ strong engagement and commitment through an open process.

Acknowledging the criteria set for critical raw materials, most of our materials are considered ‘non-critical’. Nevertheless, they are **essential and strategic to achieve the policy objectives of the EU Green Deal, its renovation wave, circular economy, climate change mitigation and adaptation just to mention a few**.

Supply of ‘non-critical’ (a subjective definition) but essential raw materials are often taken for granted, while securing a safe and sustainable access to such materials would **avoid risks of supply shortages, which can be detrimental to Europe’s Green Deal and autonomous supply of materials from EU and for EU** – and could lead to such materials being turned into “critical raw materials” in the future. **In short ‘supply cannot be assumed’ it needs planning monitoring and managing**. This was recently showed by the Covid crisis, which highlights the importance of short and efficient supply chains.

We have already witnessed increased difficulties to secure access to further deposits, for instance, due to public acceptance related issues. **Clear public support alongside adequate enabling tools for raw materials supply from and for Europe are needed** to address these perception issues from the wider public. Not addressing timely these bottlenecks might delay the provision of domestically available raw materials and create an even higher dependency from other global regions, as

¹ See the list of signatories NEEIP members at the end of the document.

highlighted in the EU Updated Industrial Strategy. This could result in significantly higher costs, higher environmental impacts, logistical challenges due to a significant increase of average transport distances and supply risks.

Europe is rich of many resources which can be sourced responsibly and sustainably. All 3rd countries raw materials imports need to be fair and sustainable to guarantee the EU extractive industries' international level playing field.

We understand the primary focus is given to critical materials in ERMA, as announced in the September 2020 CRM Action Plan. However, as stressed in the New Circular Economy Action Plan (2020); Industrial Strategy (March 2020), the CRM Action Plan (Sept. 2020), and the updated Industrial Strategy (May 2021) **the Alliance is intended to be broader, an "industrial alliance on raw materials"**.

We believe the aim of ERMA should be to facilitate access to mineral resources as a "strategic security question for Europe's ambition to deliver the Green Deal" (CRM Action Plan).

Our members would encourage ERMA to promote safe access to all essential and strategic raw materials and drive policies facilitating extractive activities and public acceptance.

The signatories believe **actions should be taken by ERMA** to support this agenda holistically, including on sustainable finance taxonomy setting workable and investable sustainable finance criteria for value chains. **We recommend the establishment of clusters addressing non-critical raw materials in particular mineral resources which are essential and strategic for EU recovery plan, Europe's Green Deal and climate neutrality by 2050.**

We would support and engage actively in initiatives from ERMA in this direction and remain available to discuss further with you how we could contribute to frame appropriately the process.

List of signatory associations from the NEEIP

Association	Full name	Contact
	The European Cement Association (CEMBUREAU)	Koen Coppenholle Chief Executive Officer
	The European Ceramic Industry Association (Cerame-Unie)	Renaud Batier Director General
	The European Gypsum Industry Association (Eurogypsum)	Tristan Suffys Secretary General
	The European Association of Mining Industries, Metal Ores & Industrial Minerals (Euromines)	Rolf Kuby Director
	The European & International Federation of Natural Stone Industries (Euroroc)	Gerd Merke Secretary General
	The European Salt Producer's Association	Maria Teresa Scardigli Secretary General (acting)
	The European Expanded Clay Association (EXCA)	Mara Caboara Secretary General
	The Industrial Minerals Association Europe (IMA-Europe)	Roger Doome Director General
	The European Aggregates Association (UEPG)	Dirk Fincke Secretary General