

VKS - Association of the German Potash and Salt Industry
V-R-B – German Mining Association
FinnMin – Finnish Mining Association
Svemin – Swedish Mining Association
SME – Greek Mining Enterprises Association
CONFEDEM – Spanish Mining Confederation
ANIET – Mining Association of Portugal
Austrian Mining and Steel Association
Polish Copper Employers' Association
Hungarian Mining Association
A3M - French Mining Association

To:

Members of the
Committee on the Environment, Public Health and Food Safety and
Members of the
Committee on Industry, Research and Energy
of the European Parliament

– Sent by Email –

24 January 2023

Subject: Revision of the Industrial Emissions Directive | MINING

Dear Member of the Committee on the Environment, Public Health and Food Safety,
Dear Member of the Committee on Industry, Research and Energy,

We contact you with regard to the current revision of the Industrial Emissions Directive (IED) and the proposed inclusion of mining activities.

We, the signing associations, represent European mining companies across Europe producing essential metals and minerals for the green and digital transition, for daily life, and indispensable industrial and food supply chains in Europe, i.a. iron ore, copper, magnesite, graphite, potash, salt, nickel, bauxite, bentonite, calcium carbonate, etc.

Our mining sector is a global leader in sustainability, we are committed to the EU principles for sustainable raw materials and climate neutrality by 2050. During the corona pandemic and since the war of Russia against Ukraine, our companies widely secured – despite skyrocketing energy prices and disrupted supply chains – the domestic raw materials production and supply for Europe.

We are very concerned about the current proposal and discussions at EU level to include the mining sector into the scope of the IED.

The mining sector and mining installations are very diverse and not comparable to typical industrial installations. Therefore, the sector was not covered by the IED in the past but subject i.e. to European and national environmental and mining specific legislations. Unfortunately, the European Commission's impact assessment did not recognize these specifics of the mining sector and the Commission came forward with an inappropriate and unreasonable proposal to include the mining sector in the IED.

This Commission's proposal would significantly weaken the competitiveness of our mining sector and could risk the operability of existing and new mining installations. We are committed to globally highest sustainability standards and the continuous improvement of our environmental performance. But in our view, this proposal is in direct contradiction to Europe's need for sustainable raw materials supply chains and secured domestic production, and moreover does not lead to added value for the environment.

We therefore urgently ask you to amend the Commission's proposal and withdraw the mining sector from the scope of the revised IED.

We kindly offer you to discuss this topic in detail and to provide further information.

We look forward to your reply.

Yours sincerely

*[Christoph Wehner, Director General
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