

*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
A3M - French Mining Association
VKS - Association of the Potash and Salt Industry*

To:

Ms Kerstin Jorna

Director General

Directorate-General for Internal Market, Industry, Entrepreneurship and SMEs

European Commission

– By Email –

9 November 2023

Subject: Industrial Emissions Directive contradicts Raw Materials Supply Security

Dear Ms Jorna,

Currently, the trilogue negotiations on the **EU Industrial Emissions Directive (IED)** are entering the final phase.

We, the mining sectors in Europe, are very concerned about the proposal to include mining activities into the scope of the IED. This proposal contradicts the EU agenda on supply security and strategic autonomy, and counteracts the new EU Critical Raw Materials Act.

The IED would lead to more inappropriate burden, higher costs, lengthy permitting, much more bureaucracy and double regulation for the extractive industries in Europe. As a consequence, raw materials supply and dependencies from outside EU will remain high and investments in Europe will be less attractive.

In our view, the potential negative impact for the raw materials supply security in Europe has not been sufficiently taken into account.

Therefore, we strongly recommend to withdraw the raw materials sector from the scope of the IED and re-assess the impact and consequences on a profound basis and in-depth analysis.

We hope you can take this information into your consideration. We remain at your disposal and please do not hesitate to contact us for further information.

Yours sincerely,

*Dr Thorsten Diercks, Director General
V-R-B – German Mining Association*

*Pekka Suomela, Executive Officer
FinnMin – Finnish Mining Association*

*Maria Sunér, CEO Svemin
Swedish Mining Association*

*Christos Kavalopoulos, Director General
SME – Greek Mining Enterprises Association*

*Vicente Gutiérrez Peinador, President
CONFEDEM - Spanish Mining Confederation*

*Hugo Albuquerque, Vice President
ANIET – Mining Association of Portugal*

*Dr Roman Stiftner, Managing Director
Austrian Mining and Steel Association*

*Marta Wisłocka, CEO & President of the Board
Polish Copper Employers' Association*

*Bruno Jacquemin, Secretary General
A3M - French Mining Association*

*Christoph Wehner, Director General
VKS - Association of the German Potash and Salt Industry*