

*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 German Potash and Salt Industry*

To:

Members of the Spanish Council Environment Presidency Team

Permanent Representatives in Europe

Members of the Permanent Representatives Committee

– Sent by Email –

9 November 2023

Subject: Industrial Emissions Directive contradicts Raw Materials Supply Security

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.

The European Commission's proposal does not sufficiently take into account this negative impact for the raw materials supply security in Europe and our sector.

Therefore, we strongly recommend to withdraw the raw materials sector from 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. Please do not hesitate to contact us for further explanation.

Yours sincerely,

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