Union Européenne des Producteurs de Granulats
Europäischer Gesteinsverband
European Aggregates Association

28 March 2011

EC Raw Materials Initiative

UEPG POSITION PAPER

UEPG, the European Aggregates Association, represents the biggest non-energy extractive industry sector in Europe. Aggregates are crushed rock, sand and gravel, used to construct Europe's essential infrastructure including homes, roads, railways, schools and hospitals. Some 3 billion tonnes per year of aggregates are produced by 17,000 companies (the majority of which are SMEs) on 24,000 extraction sites, providing jobs for more than 300,000 direct and indirect employees. UEPG now represents national aggregates associations and producers in 26 European countries.

UEPG has actively participated in the European Commission's Raw Materials Initiative (RMI) right from its conception. UEPG has positively contributed to the two Working Groups on Criticality and Land-Use Planning. UEPG's detailed position was comprehensively laid out in the June 2010 report by the University of Leoben, entitled "Planning Policies and Permitting Procedures to ensure the Sustainable Supply of Aggregates in Europe", which is available from UEPG on request.

Through detailed analysis, the Report proved that economic and sustainable supply of aggregates is directly linked with economic growth. The aggregates sector has been widely devastated by the recent economic crisis, and now hopes for a resumption of growth at European level during 2011 and 2012. That return to growth can only be achieved through the good future access to aggregate resources, which is becoming a real issue across Europe due to increasing land-use competition, frequent lack of minerals planning, unnecessarily-slow permitting procedures and often inappropriate environmental constraints.

UEPG therefore welcomes this important draft Communication, though regrets the apparently diluted focus on Raw Materials and specifically on aggregates. Therefore, in order to refocus high-level political attention at EC and national levels on the necessity of access to Raw Material resources, and specifically to aggregate resources, UEPG now submits this summary position paper:

UEPG's key and fundamental objective is to achieve good future access to aggregate resources, in order to ensure the essential and sustainable supply of aggregates for the development of the European Economy, its physical infrastructure and the building needs of its society.

Therefore, UEPG is calling for:

1. Good future local access to aggregate resources

Naturally-occurring aggregates can only be sourced from quarries and pits *where suitable deposits geologically occur*. Gaining access to these increasingly-critical deposits is becoming ever more difficult because of *competing land uses across Europe*, particularly in more developed, densely-populated regions. While the geological availability of aggregates is not critical, the *local access to resources is critical*. As aggregates are heavy and bulky, they should be produced close to the point of usage (which may include cross-border trading) to minimise transport distances, CO_2 emissions, environmental impact, transport congestion and associated costs. Access to *regional and local aggregate resources* is a key, fundamental and critical issue for the sector.

2. Prioritised access to resources in minerals planning

Aggregates are not considered in land use planning in most countries, and even where they are, there is unfortunately often an unbalanced pre-disposition against aggregates extractive activities. Therefore planning policies and permitting procedures need to be clearly addressed to *ensure the sustainable supply of aggregates in Europe*. Given the geologically-determined locations of aggregate resources, these actually deserve the same status in land use planning as other issues, such as water or other environmental resources, to ensure good long-term access to regional and local aggregate resources.

3. Simplified planning and permitting processes

The authorisation process is complex and very slow in most countries, taking typically *5-10 years to obtain authorisation* for a new extractive site, and furthermore permissions are often granted for only similar timescales, far too short to justify major capital investment. An appropriate EC guidance document recommending a structure is needed, requiring appropriate implementation at national level, to achieve clear designation of authorities and competences and time-limited procedures (say a 3 year time limit). Rationalised application processes through one authority (a *"one-stop-shop"*), or at least well co-ordinated procedures between all authorities if there are several, are also essential. When granting permissions, the duration of these should always be in line with the lifetime of the deposit: sustainability requires the extraction of the total deposit.

4. Recognition of the compatibility of extractive activities and environmental protection

The European Aggregates Industry is acknowledged as a sector *positively contributing to biodiversity*. Many active and restored aggregates extraction sites have been declared as Natura 2000 areas. Rare animal and plant species frequently exist in undisturbed areas in quarries and sand/gravel pits, both during operation and subsequent restoration. The industry has numerous *partnerships with environmental NGOs* and actively promotes biodiversity and partnerships within the industry, thus demonstrating the compatibility of extractive activities and environmental protection. The European Commission recognised in the recently published Natura 2000 guidance document for the non-energy extractive industry that mineral extraction in Natura 2000 areas is not *a priori* prohibited, and indeed also recognised the widely-demonstrated compatibility of extraction and biodiversity.

5. Removal of inappropriate barriers to Recycling

UEPG actively promotes the recycling of construction and demolition (C&D) waste through assisting the development of technical standards, campaigning against unnecessary restrictive regulatory issues and gathering recycling statistics to measure progress. Reuse, reclaiming and recycling as well as resource efficiency are key priorities for the aggregates industry. Some countries already recycle up to 90% of all available C&D waste, though that amounts to only 20% of national aggregates demand. Other countries have lower recycling rates, hitherto hindered by technical, regulatory and economic constraints. Every effort will be made to encourage more recycling in these countries, however the predominant future supply of aggregates in Europe (up to 85%) will still have to come from regional and local natural aggregate resources. This again underlines the importance of good future access to aggregate resources.