



**Mr Antonio TAJANI**  
Vice-President of the European Commission  
Rue de la Loi 200  
B-1049 Brussels

Brussels, 10 March 2014.

Honoured Member of the European Commission,  
Dear Vice-President Tajani,

The signatories of this letter represent various raw materials industries essential to the EU economy. They are extremely supportive of your actions towards an industrial renaissance in the European Union. They are strongly committed to contribute to the many initiatives you have launched to this end notably in the field of smart regulation and of raw materials, such as the European Innovation Partnership (EIP) on Raw Materials.

However they are deeply concerned by the possible adoption of a materials productivity lead indicator based on Raw Materials Consumption (RMC), as recommended by EREP. Such an indicator is not in line with the integrated approach defined by the EIP three pillar objectives and risks to undermine the implementation of the priority actions defined in the Strategic Implementation Plan. Indeed, it is our assessment that adoption of GDP/RMC as a lead materials indicator would work directly against the objectives of the Raw Materials Initiative and EU Industrial Policy.

We have identified the following issues in relation with the use of such a lead indicator:

- RMC, as DMC, is a weight-based indicator which only reflects materials density - not the efficient use of resources;
- RMC neither reflects environmental impacts, nor the value of resources for the economy and society in terms of functionality and performance of materials;
- GDP/RMC does attempt to account for imports, however sufficiently reliable data on materials content in imported goods will hardly be accessible;
- Even aiming for an ideal recycling scenario, resource decoupling objectives have to take into account both the limits of potential waste streams (e.g. available construction demolishing waste would feed in <20% of the demand for construction materials) and

the technical limits of any recycling loop. Any so-called Green or Circular Economy will still need responsibly sourced primary raw materials.

- An apparent improvement in the proposed materials productivity lead indicator could reveal a slowdown in consumption due to an economic or a financial crisis, and may not necessarily indicate a change in the management and use of resources;
- Any such improvement that simultaneously weakens EU industry over the coming fifteen years is likely to have significant implications for sustained wealth, economic resilience, import dependency, raw materials supply constraints & prices, employment and national debt post-2030, by which time the EU's ability to recover lost influence in product value-chains, withstand economic shocks originating from outside the EU and re-industrialise its economy will have been further diminished.

Such resource productivity indicators do not favour the right use of resources, but only tend to promote an absolute decrease of their use. Resource Efficiency is an integral part of the EU 2020 strategy which aims at eradicating poverty, guaranteeing education and a healthy-ageing to the EU citizens, developing low carbon economy and renewables energies, etc. The strategy requires to enhancing resource use all along the value chain, from exploration, extraction, through use, re-use and recycling/recovery. The right use of resources is not a short time objective, but an inherent part of the resource use.

Reiterating their strong commitment to those objectives, the signatories are grateful for your dedication to actions which will actually redress the competitiveness of the EU industry and sincerely count on you support for discouraging the adoption of any weight-based materials productivity lead indicator such as GDP/DMC or GDP/RMC by the EU.

Our sectors are open continuing the discussion towards a material indicator that actually monitors resource efficiency.

Yours sincerely,

On behalf of the sectors represented by the following Trade Associations:

Cembureau – The European Cement Association

Euroalliages – Association of European Ferro-alloy Producers

Eurofer – The European Steel Association

EUROGYPSUM – The European Manufacturers of Gypsum Products

Euromines – European Association of Mining Industries, Metal Ores & Industrial Minerals

EuSalt – European Salt Producers' Association

EXCA – European Expanded Clay Association

IMA-Europe – Industrial Minerals Association – Europe

UEPG – European Aggregates Association



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