

Inception Impact Assessment for a Commission Delegated Regulation on a climate change mitigation and adaptation taxonomy

Ref. Ares(2020)1680974 - 20/03/2020

Stockholm, 20 April 2020

SveMin is the national industry association for mines and for mineral and metal producers in Sweden, representing around 40 companies which employ 13,000 people in production, exploration and technology. Our member companies are active throughout the country, with the mines being mainly located in northern Sweden and Bergslagen.

The European Green Deal and the transition to a climate neutral Europe will require significant amounts of metals and minerals. The development of a more circular economy will lead to more metals and minerals being recycled. Even so, the needed transformation of the energy systems and transportation sector will require significantly more metals and minerals and will, for a foreseeable future, be heavily dependent on primary production.

Therefore, to be meaningful, the evaluation of what economic activities can be considered sustainable must take a value chain perspective, including the sourcing of raw materials needed to deliver the desired outcome.

European mineral products enable – and indeed are essential for - emission reductions and adaptation in other sectors of the economy. The TEG mentions for example, Aluminium for lightweight cars; Copper for electric motors in electric vehicles, solar panels and wind turbines; battery metals (Cobalt, Lead, Lithium, Manganese, and Nickel) for clean mobility and grid storage batteries; Zinc and Cobalt for protecting off-shore wind turbines; Silicon in solar panels; Precious metals for clean mobility and solar panels; and a host of other minerals.

In addition to being a crucial enabling activity, European mining and mineral production is leading the development of climate mitigation within the sector globally. This is not limited to investing in energy efficient technology but also include e.g. heavily investing in electrification of internal transport and infrastructure, both above and under ground.

Finally, mining and quarrying activities in Europe are essential in terms of mitigating supply risk generally, e.g. providing materials for the deployment of low-carbon technologies, and increasing the resilience of manufacturing value chains in Europe. The sector continues to contribute to a higher resilience of the EU economy to crises as exemplified by the current pandemic situation. The European metals and minerals sector contributes to the availability of critical and essential materials needed for current and future technologies while sourcing raw materials in a sustainable and responsible way.



For all the reasons above SveMin calls upon the European Commission to:

- appoint experts from the non-energy mining and quarrying sectors to the proposed Platform on Sustainable Finance;
- in line with the recommendation of the Technical Expert Group on Sustainable Finance give the proposed Platform on Sustainable Finance the task to carry out an analysis of the role the mining sector plays in meeting EU's environmental objectives; and
- in consultation with experts from the sector, establish technical screening criteria in the proposed Delegated Regulation for mining and quarrying activities that make a substantial contribution to the EU's environmental objectives.

On behalf of SveMin,

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