

Revision of the Industrial Emissions Directive:
Joint position from the
European non-energy extractive industry
(CEMBUREAU – Cerame-Unie – EUROGYPSUM –
EUROROC – EXCA – IMA-Europe – UEPG)

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EXECUTIVE SUMMARY

- The undersigned associations represent the largest part of the **non-energy extractive industry** in Europe with members in the 27 EU countries, providing mineral raw materials used to build Europe's essential infrastructure and facilitate the move to a climate neutral and sustainable economy.
- Our industries have a track record in **using natural resources in the most efficient and environmentally sustainable way**, and to reduce all externalities of extractive, processing and manufacturing activities to the minimum, in compliance with strict regulatory requirements and robust environmental impact and waste management practices.
- The European Commission's proposal to extend the Industrial Emissions Directive's (IED's) scope to the non-energy extractive industry raises important concerns, especially in the current geopolitical context, as it is expected to **hamper the supply of essential domestic raw materials**, introduce regulatory **overlaps and inconsistencies**, and penalise an environmentally virtuous sector with a vast majority of **small-scale extractive sites**.
- The Commission's **impact assessment** of the proposal already suggested an **uncertain balance of costs and environmental benefits** of expanding the scope to extractive activities; thus failing to provide a solid basis to justify this extension. The only expected benefit of the scope extension seems to be on particulate matters, which are already covered by other EU legislation and WHO guidelines. The impact assessment also failed to differentiate between metalliferous ores and industrial or construction minerals, despite major differences as regards the environmental impact.
- The very diverse nature of mineral extraction will most likely result in **case-by-case** Best Available Techniques, thus complexifying the implementation process and reducing the added value of EU legislation.
- The **lack of clearly established definitions** and the use of **open lists** in the Commission's proposal would also likely result in a differentiated implementation across the Member States and regions of the EU, adding to the confusion and complexity for economic operators and public administrations.
- We consider that the proposed extension of the scope to non-energy extractive industries **would not be proportionate**, with an expected low environmental benefit in relation to the administrative burden on small economic operators, hampering the industrial transformation required for the green transition of our sectors.
- Furthermore, **linking IED requirements with the end use** of processed minerals seems contradictory with the alleged logic of the legislation, which aims to reduce emissions from extractive and production sites, where they occur, regardless of the downstream applications.
- To provide further legal certainty, improve the Directive's efficiency and reduce its negative economic impact, we suggest using a definition established in the REACH Regulation, to distinguish extractive activities **according to their actual environmental impact**, i.e. excluding

those non-energy minerals and rocks which occur in nature and are “*unprocessed or processed only by manual, mechanical or gravitational means; by dissolution in water; by flotation; by extraction with water; by steam distillation or by heating solely to remove water; or that are extracted from air by any means*”.

1. BACKGROUND

Together, CEMBUREAU – EUROGYPSUM – EUROROC – IMA-Europe – UEPG represent the largest part of the non-energy extractive industry in Europe with members in the 27 EU countries.

Our mineral raw materials are used to build Europe’s essential infrastructure adapting to climate change including homes, roads, railways, schools, hospitals, offices, commercial buildings, dikes and dams. We are key for industry in EU to deliver essential goods and services for the citizens.

Our associations represent companies that cover a demand of around 3.8 billion tonnes of mineral raw materials produced every year on 31,500 sites, by 17,000 companies (mostly SMEs), employing directly >250,000 people across Europe.

Our members are committed to supplying this huge amount of mineral raw materials and products which enable Europe’s transition to a climate neutral, pollution free and circular economy. Our industries contribute to Europe’s strategic autonomy by an exclusively domestic supply of mineral raw materials.

Our industries are fully committed to sustainable development and have a recognised track record, by the European Commission and environmental NGOs, of actions preserving biodiversity and the environment in general.

Our associations support the EU Green Deal’s objectives and stand ready to support its implementation.

The legislative proposal for a revision of the Industrial Emissions Directive¹, which the European Commission adopted on 5 April 2022, corroborates the above in its third recital and confirms that the European Union recognises our decisive role, establishing that “*The Union’s extractive industry is key to achieving the aims of the European Green Deal and the EU industrial strategy, including its update. Raw materials are of strategic importance for the digital and green transition, the energy, materials and circular economy transformation and to strengthen EU economic resilience. In order to achieve these objectives, sustainable domestic capacities need to be further developed.*”

Our members work on a daily basis to foster the European regulatory framework on waste and the circular economy². They promote sustainable extraction across Europe and demonstrate through good practices that socio-economic activities can be part of the solution for nature conservation objectives. Indeed, extractive activities already must comply with the EU nature protection framework, including the Natura 2000 and Birds and Habitats Directives.

Through strict aftercare procedures, non-energy extractive sites provide a high potential to develop and enhance biodiversity. Many examples from our members show that our activity is compatible and can perfectly be carried out in Natura 2000 sites or other sites with high protection status, due to the responsible approach taken by the various operators.

The protection of ecosystems and the environment at all times is a high priority for our industry. In October 2021, UEPG, CEMBUREAU and EUROGYPSUM signed a Code of Conduct on Species Protection in the Extractive Sector³, together with BirdLife Europe & Central Asia, to create, support and protect

¹ COM(2022) 156: Proposal for a Directive of the European Parliament and of the Council amending Directive 2010/75/EU of the European Parliament and of the Council of 24 November 2010 on industrial emissions (integrated pollution prevention and control) and Council Directive 1999/31/EC of 26 April 1999 on the landfill of waste.

² In particular the March 2020 updated Circular Economy Action Plan and Directive 2006/21/EC on the management of waste from extractive industries.

³ Available at: <https://www.birdlife.org/news/2021/10/28/species-protection-code-conduct-biodiversity-protection-quarry-extraction-sector/>

temporary biotopes inside operating quarries. The Code was endorsed by the European Commission's DG Environment.

Our sectors also consider it a high priority to use natural resources in the most efficient and environmentally sustainable way, and to reduce the impact of our extractive, processing and manufacturing activities as much as practically possible.

In that respect, our Associations would like to present a few characteristics of the non-energy extractive industry in relation to the proposed review of the Industrial Emissions Directive.

2. GENERAL COMMENTS

Introduction

The European Union's Industrial Emissions Directive (IED) is a major policy instrument aimed at preventing or reducing emissions into air, water and soil, as well as preventing waste generation by industrial installations. When adopting a new proposal to revise the IED on 5 April 2022, the European Commission set the objective of supporting the European Green Deal and the EU's Zero Pollution Ambition by reviewing the existing measures to address pollution from large industrial installations and ensuring they are fully consistent with climate, energy and circular economy policies.

A number of policy and regulatory tools are in place at EU and national level to address environmental aspects of industrial production. Their articulation with an expanded IED needs to be considered carefully, to avoid excessive or unnecessary regulations.

The potential inclusion of the non-energy extractive industry would not only be irrelevant to the purpose of the IED, it would also create cumbersome and costly procedures for permitting, for an industry extracting and processing inert materials compatible with nature conservation.

Lack of opportunity of the proposal

The high energy prices, the disrupted supply chains and high inflation pose existential threats to companies who have already been under pressure in the last years due to the COVID-19 crisis. This dramatic situation calls for an EU policy framework which mitigates these severe challenges whilst supporting the necessary industrial transformation required for delivering the long-term objectives of the Green Deal. The proposed revision of the Industrial Emissions Directive (IED 2.0) departs from these imperatives.

Furthermore, while we appreciate the European Commission's intentions to streamline the directive, promote innovation and reduce emissions, we do not see the current proposal as a means to reach these goals. On the contrary, the new proposed requirements lead to legal uncertainties, it risks prolonging and complicating the permitting procedures, and undermine the ongoing industrial transformation. Proceeding with the IED 2.0 as proposed would divert the necessary financial and human resources from the transition as it does not consider the operating periods nor the investment cycles of industrial plants.

Also, our associations are concerned that the Commission has decided to put such a proposal forward at a moment when the entire sustainability legislative framework (e.g., chemicals, ecodesign for sustainable products, energy and climate legislations) is under revision: the expected environmental benefits are not properly assessed and likely to be overstated, whilst the proposal will most certainly induce overlapping regulation and inconsistencies.

This paper offers a brief summary of the concerns perceived by our industries, following the structure of the Commission's policy options.

Inconclusive impact assessment of the IED proposal

While we understand that the IED's [evaluation](#) was supported by several [studies](#) and while 38 studies are referred to on the dedicated Commission's website, we failed to find any specific one on extractive industries. The report entitled "**Gathering of complementary evidence for assessing the impacts of extending the scope of the IED to additional sectors. Final Report**" (dated 18 November 2021), is in fact very poor and not conclusive at all in terms of justifying the inclusion of some listed extractive industries (i.e. gypsum). Furthermore, the approach taken in the impact assessment for the IED's scope expansion has insufficiently considered the principle of proportionality in relation with the existing risks.

The Commission undertook an impact assessment to examine the need for EU action to address the IED implementation's shortcomings and to analyse the possible impacts of available solutions. This assessment was meant to provide evidence and inform the Commission in its decision-making for proposing revisions to the IED.

However, when considering this Impact Assessment, it clearly recognises that including mining and quarrying in the IED is likely to be *less effective and proportionate* compared to other sectors.

Furthermore, the evaluation of the net benefits of this scope enlargement for the EU society did not deliver any clear results, concluding, therefore, with an uncertain balance of costs and environmental benefits, even suggesting that *the costs could outweigh the benefits*.

It must be noted, though, that this study failed to differentiate the metalliferous ores from the industrial and construction minerals, using instead a single category: 'mining and quarrying'. In practice, the reality is that these sub-sectors are completely different in terms of processes, environmental impact and business models.

A diverse sector dominated by small and medium-sized enterprises (SMEs)

According with the Best Available Techniques Reference Document for the Management of Waste from Extractive Industries⁴, the non-energy extractive industry in Europe consists of:

- Sites (mines/quarries): 31,500 sites
 - 31,243 industrial and construction minerals extraction
 - 247 metalliferous ores
- Companies: 17,000 companies; >95% SMEs
 - 16,500 industrial and construction minerals extraction
 - 250 metalliferous ores
- Mineral & Rocks Raw Materials supplied: 3.8 billion tonnes/year
- Direct jobs: >250,000 jobs
 - 200,000 industrial and construction minerals extraction
 - 50,000 metalliferous ores
- Turnover: 47 billion € / year
 - 36 billion € industrial and construction minerals extraction
 - 11 billion € metalliferous ores

These figures show that the European extractive industry has small average size sites:

- 7.93 direct employees

⁴ Available on the European Commission's JRC portal: <https://publications.jrc.ec.europa.eu/repository/handle/JRC109657>



- 120,000 tonnes / year
- 1,495,000 € / year incomes

A non-polluting industry

There does not appear to be any added value of using the IED as the most suitable tool to regulate well-managed, low impact and small-scale activities.

The waste is properly covered by an internal waste management and circularity plan. According to the Directive 2006/21/EC of the European Parliament and of the Council of 15 March 2006 on the management of waste from extractive industries and amending Directive 2004/35/EC, most of this very low rate of non-used materials are included under the *inert wastes* definition and used almost exclusively for rehabilitation and restoration purposes in accordance with article 10 (excavation voids) and managed within the waste management plan.

Most waste from the extraction and treatment processes is inert, thus no significant impacts are expected on water, air, and soil. Besides, the majority of European extraction sites are in the front line of implementing the Circular Economy Action Plan by minimising the generation of any kind of wastes and the consumption of water and applying recycling techniques to waste water.

The extractive industry mostly deals with dust as main concern, more particularly diffuse dust emissions. In combatting, diffuse dust emissions reduction plans are already an intrinsic part of extracting permits. Moreover, the extraction process does not involve combustion activities and the extraction entails low CO₂ emissions.

Risks of legislative overlaps without significant environmental benefits

As indicated previously, mining and quarrying are already amongst the most regulated sectors around the world. As a consequence, extraction and treatment processes follow very strict rules, are heavily regulated and the companies involved apply high standards of self-regulation.

Without being covered by the IED, our sites are subject to environmental authorisations and other legislation that cover all the potential impacts to environment or human health. For instance, in the EU, the permits for extractive activities include hydrological studies, environmental impact assessment and require the development of water, dust and noise management plans where appropriate.

The extractive industry is already covered by a notable amount of legislation, sometimes, depending on the Member State, more stringent than the one proposed by the European Commission. Moreover, circular economy is covered through waste legislation, EU guidelines and BREFs (Best Available Techniques Reference Document for the Management of Waste from Extractive Industries), energy efficiency is regulated by its own specific legislation and water efficiency is under the Water Framework Directive. In addition, there are environmental permit processes that fall under national legislation.

The following table explains how existing regulation is already triggering improvements in the environmental performance of the extractive sector. As acknowledged in the Commission's Impact Assessment, existing regulation already addresses the main environmental impacts of these activities, reducing the range of potential benefits attributable to the IED. This situation would considerably limit the added value of this scope enlargement and significantly lower the efficiency of the IED due to the high costs associated with its implementation. Furthermore, the additional administrative burden that would be caused by this scope enlargement would not only impact national and local authorities in charge of permitting, but also EU bodies such as the Joint Research Centre (JRC), which would be in charge of developing BREFs for a sector whose activities are extremely diverse due to site-specific conditions and clearly not suited for the IED framework.

Policy Measures	Option and/or	RAG rating	Brief assessment
PO5-b (extending scope for multiple sectors)			PO5-b considers the expansion of scope of the IED to include a range of sectors such as battery production; shipbuilding; forging presses, cold rolling and wire drawing; textile finishing activities; and/or smitheries. These sectors were identified as remaining 'polluters' for consideration. However, there is uncertainty as to whether further regulation through the IED would result in additional environmental improvements, despite introducing additional regulatory burden on operators and public authorities.
PO5-c (extending scope for landfill and/or adopting BAT conclusions for the sector)			PO5-c is unlikely to lead to significant additional benefits, whilst it would yield additional regulatory burden. This is primarily because there is already existing legislation that attempts to address the environmental footprint of landfills, especially the Landfill Directive, and the assessment has highlighted that negligible environmental impacts should be expected from this option.
PO5-d (expanding scope to cover mining and quarrying)			The mining and quarrying sector is also regulated by existing legislation that appears to have a role in encouraging improvements in environmental performance. The extent to which the IED could contribute to additional improvements without duplication and relatively more significant administrative burden is unclear, although it is expected that costs may outweigh benefits.
PO5-e (expanding scope to cover aquaculture)			The aquaculture sector is also regulated by multiple pieces of legislation at the EU and national level, which appears to have a role in mitigating negative environmental impacts (e.g., through EIA). The extent to which the IED could contribute to additional improvements without duplication and relatively more significant administrative burden is unclear. In fact, in this case, the assessment highlights that although the IED could result in marginal benefits, the additional regulatory burden is likely to be relatively higher.
PO5-f (expanding scope to cover upstream oil and gas)			The evidence available and stakeholders suggest that this sector has a significant environmental footprint and that this does not appear to be regulated consistently across the EU. Including the sector within the IED could, therefore, lead to significant environmental benefits although this is very uncertain, as it will depend upon the interaction with existing national and EU legislation, technological progress, etc. Similarly, including the sector within the IED is likely to lead to increasing administrative and compliance costs for operators, and affect their competitiveness. That is, regulatory burden is likely to increase significantly. Overall, the balance of benefits and costs is unclear and uncertain.

Extract from the IED Impact Assessment: PO5-d mining and quarrying installations⁵

Based on this report, the main environmental benefits achievable by the IED in the industrial minerals sector would be focused on Particulate Matter (PM), expecting reductions of a maximum of 4.4%, and only in specific locations.

However, existing EU legislation and WHO guidelines⁶ already impose binding limits on PM 2.5 and PM 10, implying that the suggested scope enlargement would not only lead to burdensome double regulation, but also to potential conflicts between different frameworks.

Huge diversity in extraction, production, and installations will result in case-by-case BAT

The very nature of mineral extraction requires a **tailor-made approach to each extractive site**, which makes it difficult to make comparisons between sites and to apply a generic BAT-based approach, such as in the IED. Indeed, there is little comparability in terms of extraction and production of the different minerals and rocks since these vary depending on a series of factors: geology, geography, geomorphology, extraction process, treatment, environmental conditions, technologies or the use of the final product.

Therefore, comparing installations for the use of BATs in an industry that is intrinsically diverse could negatively impact the achievement of the objectives.

Lack of EU legal definitions will lead to legal uncertainty

Our associations identify that the proposal generates legal uncertainty because some of the terms are not legally defined in any EU piece of legislation. This may lead to the use of existing national definitions and terminologies, thus endangering the purpose of having EU legislation and the effectiveness of the IED. In the absence of national legally binding definitions, some regions may also decide to produce their own. The absence of legal definitions at EU, national and regional level would lead to case-by-case interpretations, which would be the worst-case scenario, maximising legal uncertainty for companies and leading to competition distortions and disruption of the EU single market.

⁵ From the chart: 'RAG Rating' refers to a Red/Amber/Green traffic light system, used for identifying the most and least suitable options

⁶ WHO global air quality guidelines - <https://apps.who.int/iris/bitstream/handle/10665/345329/9789240034228-eng.pdf>

For the same reasons, the difficulty of transposition and translation of the undefined terms will be a huge threat to the proper implementation of a revised IED, causing the same unwanted effects.

Open lists will lead to legal uncertainty

Furthermore, our industries are concerned about Article 74, which empowers the Commission to adopt delegated acts to further extend the sectoral scope of the directive. This undermines the legal certainty for operators. Therefore, we believe that any such substantial changes to the scope of the directive should require a proposal subject to the ordinary legislative procedure.

Questionable effectiveness of the directive and its implementation

The Commission's announced objective is to increase the ambition in permits and tighten flexibilities in order to facilitate the green transition and fulfil the goals of the EU Green Deal. However, we are not convinced that the IED 2.0 will lead to this result. To the contrary, we fear that it would hamper the industrial transformation needed for the green transition.

Setting all permit conditions at the lowest ends of the BAT AEL range ('default option' in Art. 15-3) is technically impossible for ANY installation: a plant can emit different pollutants and it cannot comply with the lowest emission limit values for each and every individual parameter (optimising one parameter may have a negative impact on another). As this provision is technically impossible, it is naturally obsolete. Also, we are concerned that this provision would go against the IED's integrated approach, the BAT definition and installation-specific applicability principle, which invite authorities to consider the differences in the grade / purity and quality of the finished product, and in the specific design, construction, size and capacity of the installation. This is even more important in the case of the extractive industry where the specific nature, conditions and geology of the extracted deposit will make it impossible to reach a common ground. This was evidenced by the preparation of the Best Available Techniques Reference Document for the Management of Waste from Extractive Industries, in accordance with Directive 2006/21/EC.

Considering the impossibility of implementing the 'default option', ALL operators would be required to develop a feasibility assessment. This is problematic as it would bring additional demand on competent authorities (who are often under resourced), which would be difficult to handle. This would lead to further unacceptable permit delays, contradicting the very imperative of the Green Deal, i.e. to clarify and simplify permit procedures and achieve accelerated decreasing trends of emission levels.

Widening the scope will hamper permitting and overburden competent authorities

Expanding the sectoral scope of the IED will risk undermining the whole Sevilla process of thorough data collection and derivation of BAT-associated emission levels. Also, the enlarged sectoral scope will increase the demand on competent authorities to issue permits. This will lead to further permit delays which in turn could slow down the EU's transition. In the case of the extractive industry, this is particularly critical. This is precisely against the aim of the IED as reflected in its third recital.

E-PRTR sets a bad precedent for effectiveness

We understand that the Commission itself considers that the E-PRTR Regulation has poorly delivered when applied to the extractive industry. Considering that 283 sites reported emissions to E-PRTR in

2018, it is unlikely that each site would produce five tonnes of PM per year or 14 kg per day. However, because of poor data availability, not all Member States are included in this total⁷.

Harming competitiveness and innovation

The introduction of the extractive industry under the IED would entail additional burdens for the SMEs in the extractive industry which represent the vast majority of companies. Permitting will come at an extra cost, while harming competitiveness. Needless to mention, this would also hamper technological innovation in the sector.

Emission or use-focused legislation?

Our industries fail to understand the logic of distinguishing industrial emissions by end use, considering that the directive would be applicable to extraction and production sites. Given that this is a directive that would apply to the processes of extraction and treatment of the rocks and minerals that would eventually be included in its scope, it makes little sense to link the definition of this scope to the subsequent use of the mineral. A logical approach would be based instead on the relevance of the emissions generated in their extraction.

At the EU level, one of the main policy frameworks in the field is the Extractive Waste Directive, with a dedicated BREF in which the three categories of extractive industries are categorised based on their end-use: fossil fuels, metalliferous ores, and industrial & construction materials – please note these last two are listed together as they have similar characteristics.

The joint categorization of industrial and construction minerals is not due to their similar end-uses in some cases, but mostly to the fact that their extractive sites, manufacturing processes and **environmental impacts are very similar**. These sectors mainly rely on basic physical transformations of the extracted materials, with very limited or no use of chemical substances, avoiding the generation of hazardous waste and other pollutants.



This is why we would suggest amendments to the Commission's proposal, focusing on what we believe should be the primary goal of the IED, namely reducing the environmental impact of extraction.

*We propose following the definition established in the **REACH Regulation**, to distinguish extractive activities according to their actual environmental impact, i.e. excluding those non-energy minerals and rocks which occur in nature and are **"unprocessed or processed only by manual, mechanical or gravitational means; by dissolution in water; by flotation; by extraction with water; by steam distillation or by heating solely to remove water; or that are extracted from air by any means"**.*

This approach would in our view not only provide legal certainty, being based on a long-established EU regulatory framework, but also be the most efficient one, focusing only on those extractive activities with the highest environmental impact and lowering implementation costs.

Moreover, the development of future BREFs would remain more similar to the already existing ones, covering the emission of pollutants from these transformative processes, which are closer to 'standard' industrial transformations than the simple physical transformations (e.g. crushing or grinding) that occur in the majority of the extractive industry sector.

⁷ Gathering of complementary evidence for assessing the impacts of extending the scope of the IED to additional sectors – Final Report – European Commission – November 2021

List of signatory organisations and contact details

	CEMBUREAU – The European Cement Association CEMBUREAU, the European Cement Association is based in Brussels and is the representative organisation of the cement industry in Europe. Currently, its Full Members are 23 national cement industry associations and cement companies of the European Union plus Norway, Switzerland, Turkey and the UK. Croatia, Serbia and Slovakia are Associate Members of CEMBUREAU. Cooperation agreements have been concluded with Vassiliko Cement in Cyprus and UKRCMENT in Ukraine. Please click here to view the 2050 Carbon Neutrality Roadmap online, and click here to access CEMBUREAU’s map of ongoing innovation projects.	Nikos Nikolakakos Environment and Resources Manager n.nikolakakos@cembureau.eu +32 2 234 10 22
	Cerame-Unie represents the European ceramic industry. Our mission is to ensure that the voice of this competitive, dynamic and innovative industry is heard at the EU level. Our membership is drawn from the national ceramics associations and companies across Europe with whom we work to provide solutions to challenges affecting the industry in Europe and globally. The EU Ceramic Industry is a world leader in producing value added, uniquely designed, high quality ceramic products manufactured by flexible and innovative companies, the majority of which are SMEs. The ceramics industry represents an annual production value of around €30 billion, accounting for approximately 25% of the global production, and over 200,000 direct jobs throughout the EU. More about us here.	Daniela Vigilante Environment and Innovation Director vigilante@cerameunie.eu +32 2 808 38 80
	Eurogypsum is a European federation of national associations of producers of gypsum products (i.e. plaster and plasterboard). It is one of the few fully integrated industries (from cradle to cradle) within the construction products field. The companies which mine gypsum also process it and manufacture the value-added products and systems used extensively in construction and other industries. With a turnover of EUR 7 billion, the European gypsum and anhydrite industry operates some 160 factories and 154 quarries and generates employment directly to 28,000 persons and indirectly for 300,000 persons. The gypsum industry provides jobs to 1,100,000 plasterers and plasterboard installers. It trains around 25,000 persons per year across Europe. Find out more about Eurogypsum here.	Tristan Suffys Secretary General t.suffys@eurogypsum.org +32 491 34 07 90
	Euroroc - European & International Federation of Natural Stone Industries The various European federations of the dimension stone industry decided in 1950 to found a common organization to work together on the European level. As the process of European integration has developed, the need for joint decision making and common activities has increased. As in most fields, it is also true in the dimension stone industry that a common European standpoint is needed, in order to harmonize the interests of the member federations and at the same time to protect the regional diversity of the industry. More about Euroroc here.	Prof. Dr. Gerd Merke Secretary General office@euroroc.net +49 611 977 12-11



	EXCA is the European expanded clay association and represents the interests of all major expanded clay producers throughout Europe. Expanded clay is a well-proven, high quality, efficient and durable lightweight aggregate suitable for a wide range of applicants in the construction sector. It is a sustainable construction material packed with properties that improve the economic, social and environmental performance of a building or infrastructure over its whole lifetime. With its 11 member companies in 10 countries operating some 11 plants throughout Europe EXCA represents more than 90% of the European industry.	Mara Caboara Secretary General Mara.caboara@exca.eu +32 479 47 00 06
	IMA-Europe: the Industrial Minerals Association IMA-Europe is the decisive EU voice of industrial minerals producers and importers. We represent more than 250 companies, employing over 42.500 people. Our mission is to develop a thriving industrial minerals sector at the heart of a sustainable Europe. IMA-Europe helps industrial mineral companies continuously improve their performance and reputation by tackling issues related to minerals' properties and safe use, from their extraction and processing to their entire value chain. Health and safety at the workplace, environmental performance, product safety and awareness about the importance of industrial minerals for society are at the core of IMA-Europe's priorities.	Guillermo Gea Environment and Energy Manager g.gea@ima-europe.eu +32 467 153 969
	UEPG Since 1987, UEPG represents the European Aggregates Industry in Brussels, with 26 Members in 25 countries. It is by far the largest non-energy extractive industry, covering a demand of 3 billion tonnes of aggregates per year, produced on 26,000 sites by 15,000 companies (mostly SMEs), and employing 200,000 people across Europe.	Gaspard Van Goethem Public Affairs Officer secretariat@uepg.eu