

2012 ACTIVITY REPORT

THE EUROPEAN LIME ASSOCIATION





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Foreword

2012

The volatility of the financial markets, the deep financial crisis in the Eurozone and the negative or stagnated economic growth made 2012 a challenging year also for the lime industry.

Competitiveness of the European industry is more than ever in the heart of the debate. For the first time after several years, the climate change and environment policies do not dominate the European policy arena. High energy prices and important legislative burden make our industry unable to compete at international level.

The European Institutions have realized the importance of keeping the manufacturing industry in Europe and set an ambitious target of increasing the **EU industrial GDP to 20% until 2020**. However, a concrete action plan and the legal basis to set up a real industrial **policy** in Europe are still currently missing.

The lime industry, although having strong fundamentals, is permanently challenged to remain competitive. Being an enabler, lime demand is driven by the other sectors markets such as steel, construction, chemicals, etc.

To face all these challenges, EuLA, after having assessed the opportunities and threats, has elaborated a **strategy** for the next years. It sets the **vision** for the lime sector which is to ensure a competitive position for lime in a low carbon economy future but also make lime known as a sustainable product contributing to a smart and inclusive growth in Europe. This strategy focuses on preventing and anticipating any harmful legislation as well as strengthening the lime sector presence at European level. A detailed **action plan** describes the way to make it happen.

The Secretariat, under the guidance of the Board of Directors, is already implementing this strategy. EuLA is today registered under the **EU Transparency Register**, which demonstrates that EuLA plays by the advocacy rules of the European Union.

The association operates with the support and expertise of the Committees composed by members, namely the Technical and Environment Committee (**TEC**), the Lime Application Committee (**LAC**) and the Standardisation (**SdC**) ones, which are composed by Task Forces (**TFs**). To better structure those groups, the Secretariat has elaborated **Terms of References** which describe in details the internal rules and procedures of their operation.

We would like to address a particular thanks to the **Chairs** and participating **members** of those working groups for their dedication and their contribution to the work of the association. The active participation of the members who bring their relevant expertise is **key** for any association and sector.

A special thank goes to **Daniel Puiatti** who retired this year. He served the Asphalt pavement TF for several years and gave a considerable impulse to the work of this group. Christophe Denayer has been appointed as the new Chair of this TF. Steve Foster also has been appointed Chair of the Standardisation Committee.

This annual report highlights the most important areas of the activities of our association and covers the period from June 2012 to May 2013.

Before concluding this introduction, we invite you to address a particular thought to **Michel Denys** who recently passed away after a long illness which he fight with courage and dignity that we admire. Enthusiast and passionate for his profession, he had enriched us with his knowledge and experience for long years and has contributed this way to the success of numerous dossiers. We wish to express our gratitude to him.



Jacques-Bernard De Jongh
EuLA President



Eleni Despotou
EuLA Secretary General

1. General energy and climate policy overview

In the course of 2012 and beginning of 2013, the political scene has been dominated by the economic crisis, its impacts and the way out of it. However, trends for the first time show that economy and growth from a political perspective have been given more visibility and importance than climate change. However, DG Environment and DG Climate Action continue on the decarbonisation path. The European Commission also launched the Raw materials initiative and the European Innovation Partnership (EIP) which was also part of the agenda of both Presidencies both EU **Presidencies (Cyprus and Ireland)**.

1.1. Climate and energy package 2030

The European Commission on 27 March 2013 published three documents related to its future climate and energy policies. Namely,

1.1.1. Green Paper on 2030 policy framework, which raises a set of questions, including:

- What type, nature and level of climate and energy targets should be set for 2030? – 40% GHG reductions by 2030.
- How can coherence between different policy instruments be reached?
- How can the EU industry's competitiveness be maintained in line with new climate and energy objectives towards 2030?
- How can Member States' different capacities to act be taken into account?

The consultation runs until 2 July. On the basis of the views expressed by Member States, EU institutions and stakeholders, the Commission intends to table the EU's 2030 framework for climate and energy policies by the end of this year.

1.1.2. Carbon capture and storage (CCS)

This Consultative Communication identifies the barriers that have prevented CCS from developing at the pace foreseen in 2007. For instance, with EU emissions trading system prices well below original expectations, there is no rationale for economic operators to invest in CCS. The Communication discusses options to further promote the timely demonstration and early deployment of CCS, and invites contributions on the role of CCS in Europe. The responses to the consultation will feed into the Commission's work on the 2030 policy framework. There is no particular deadline for replying to the consultation.

1.1.3. Renewable energy

The renewable energy (RES) progress report shows that the current policy framework of legally binding renewable energy targets has resulted in strong growth of the renewable energy sector until 2010, with an EU RES share of 12.7%. For progress to continue and to meet the targets in 2020, the Commission says that more efforts will be needed. The Commission thinks in particular of creating certainty for investors, reducing the administrative burden and increasing clarity in the planning.



1.2. Industrial policy

On 10 October, Enterprise and Industry Commissioner Antonio Tajani presented the new Communication on Industrial Competitiveness in which the Commission proposes a strategic partnership between the EU, the Member States and the industry in order to reverse the declining trend in European industry. The target adopted is to have industry account for 20% of the EU GDP by 2020 while it currently accounts for 15.6%. Although the industry has warmly welcomed the initiative, there is a lot of criticism regarding the lack for concrete actions to reach that target. There were also calls for more detailed sectoral approaches.



2. Policy areas of major interest for the lime sector

2.1. Climate change

2.1.1. ETS / Carbon leakage

The EU Emissions Trading Scheme (EU ETS) remains high on EuLA's agenda. Especially the revision of the carbon leakage list has been identified as a major threat. Remaining on the list is of paramount importance as falling of the list would imply serious costs and would hamper the sector's competitiveness to produce in Europe.

Although the revision of the carbon leakage list will only take place during 2013 and 2014, EuLA has already been very active on this issue throughout 2012.

The EuLA Secretariat prepared in April 2012 a detailed 19-page report on the risks of the revision of the carbon leakage list for the lime sector. The report clearly identifies the different issues, and proposes solutions. The main threats identified and analyzed in the report are:

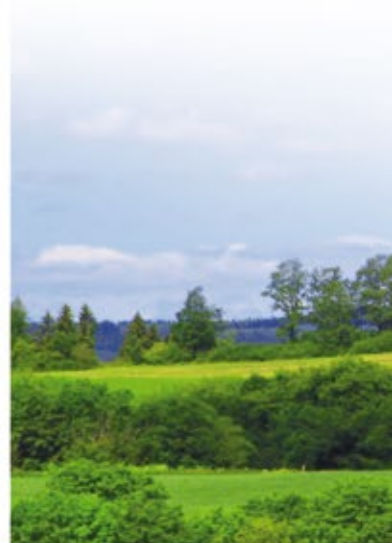
- The impact of the lime benchmarks on the level of auctioning.
- The carbon price to be taken into account for carrying out the assessment.
- The fact that GVA data from lime is now grouped together with the data from the less carbon intensive plaster sector.

On the basis of the conclusions of the report, EuLA has written a letter to DG Climate Action in July 2012 to draw the Head of Unit's attention to the specific issues for the lime industry. Also the cabinet of the President of the European Council was contacted and informed.

Moreover, EuLA was involved in several other actions. In June EuLA sent on behalf of the Alliance a letter to several EU Commissioners highlighting that "a review of the carbon leakage list should not jeopardise the carbon leakage status of the energy intensive sectors currently on the list". In other words, a political decision is required not to fundamentally touch the list and to keep a stable macro-economic international business climate, especially in the absence of an international climate agreement.

EuLA has been working on a methodology for separating the GVA data from lime and plaster. Several options have been investigated. EuLA and some of its members got in touch with their national statistical offices in order to check if the GVA from lime and plaster could be split at national level. This turned out to be a very complicated process, so EuLA had to look for alternatives.

Therefore, the association engaged with PricewaterhouseCoopers (PwC) and Ecofys to get a clearer view on the real GVA data for lime. PwC collected data from a representative sample of lime companies to define the sector's GVA on that basis. Ecofys on the other hand had a more detailed look at the official Eurostat statistics – and by combining available data at NACE level with Prodcom data – several methodologies were proposed to split the official GVA data. Ecofys has recommended preparing a dossier for both "lime" and "dolime" separately – as both products appear in a different classification, and the Commission may not accept that lime and dolime are examined together, while only plaster is separated.



The main factor that will influence the results of the revision of the carbon leakage list for the lime sector is the carbon price that will be chosen for carrying out the assessment. Although the Commission is legally required to do the assessment with a carbon price of 30 euro per ton of CO₂, it is very likely that given the current low carbon prices, the Commission will face heavy pressure to use a lower long-term average. EuLA has participated in the preparation of a legal opinion (by law-firm Luther) to prove that the Commission has to take the same carbon price as in the "Impact Assessment" accompanying the climate package: i.e. 30 euro.

These activities will gain further momentum throughout 2013 and 2014. DG Climate Action will prepare the new carbon leakage list, in association with DG Enterprise. EuLA has met the person in DG Enterprise in charge of the carbon leakage list revision. The Commission will rely on Ecorys for carrying out the assessment, while the methodologies will be further refined by Ecofys and Öko-Institut.

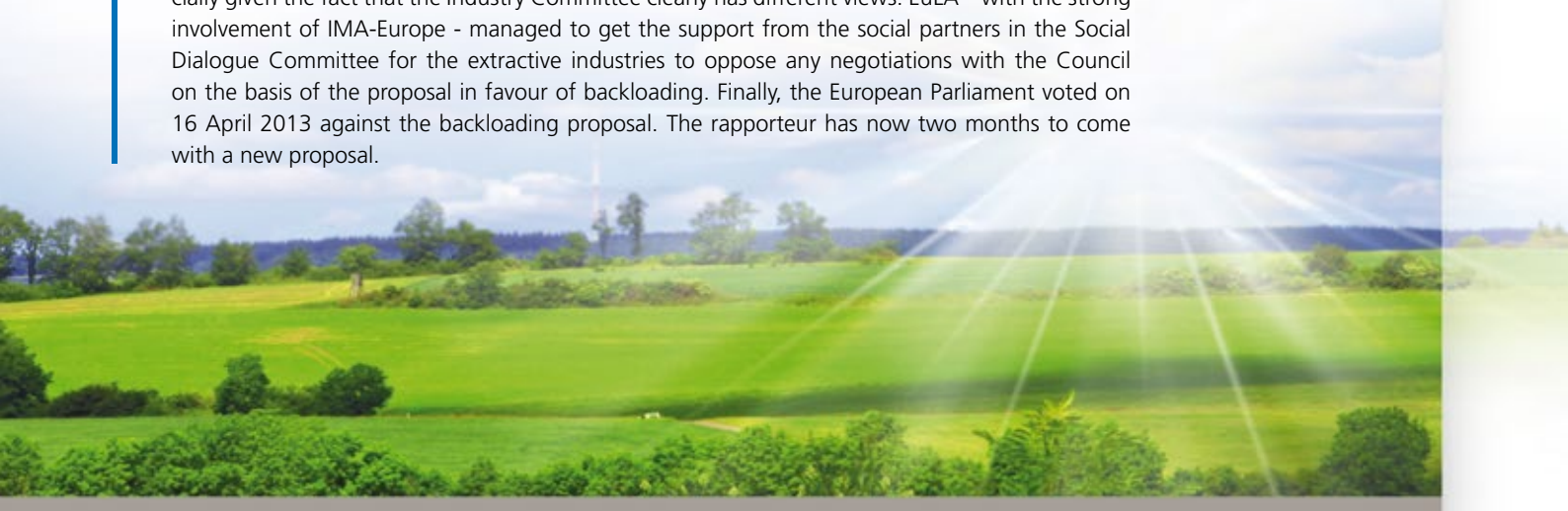
The new carbon leakage list should be available by the end of 2014.

2.1.2. ETS / Backloading

"Backloading" refers to the Commission's proposal to shift the auctioning of a defined number of carbon allowances from the first years of the 3rd Trading Period towards the end. Backloading should result in a short-term increase of the carbon price, and open the door for a more structural intervention in the carbon market (for example, by cancelling the allowances that are withdrawn from the system).

EuLA has heavily challenged the Commission's legal basis for intervening in the carbon market. As a result the Commission had to publish a proposal to amend the EU ETS Directive that would actually give them the legal basis for intervening in the Carbon Market.

This amendment was heavily debated in the European Parliament where the Environment Committee voted in favour, while the Industry Committee was against. Nonetheless the Rapporteur, MEP M. Groote, wanted to start trilogue discussions with the Council and the Commission before the report was adopted in plenary. EuLA and the Alliance of Energy Intensive Industries have expressed their strong reservations on this process, and have insisted on a discussion in plenary first, especially given the fact that the Industry Committee clearly has different views. EuLA – with the strong involvement of IMA-Europe - managed to get the support from the social partners in the Social Dialogue Committee for the extractive industries to oppose any negotiations with the Council on the basis of the proposal in favour of backloading. Finally, the European Parliament voted on 16 April 2013 against the backloading proposal. The rapporteur has now two months to come with a new proposal.



2. Policy areas of major interest for the lime sector

EuLA has prepared a position paper against the Commission's plan to backload allowances in the 3rd Trading Period. In particular, EuLA warned against the transfer of power from the EU Member States (Council) and Parliament to the European Commission. If the proposal was to be adopted the Commission would get a near "carte blanche" to interfere in the carbon market whenever they consider the carbon prices as being too low. The EuLA position paper was submitted to DG Climate Action's public consultation. EuLA and its position were also explicitly quoted in "Carbon Market Europe" on 2 November 2012.

EuLA also contributed to the position paper prepared by the Alliance of Energy Intensive Industries.

In order to reinforce the EuLA advocacy also at national level, the EuLA Secretariat prepared in November 2012 an advocacy package for all EuLA Members consisting of the different position papers, timeline and overview of key persons.

2.1.3. ETS / Carbon Market Report and Structural measures

On 15 November the Commission published its Carbon Market report with a number of more structural measures to intervene in the carbon market (e.g. permanent set-aside, increase of the linear reduction factor, etc.).

The report says that due to the economic crisis and the large number of international allowances in the system the carbon prices have significantly fallen. In the Commission's view the current low carbon prices do not sufficiently trigger new – low carbon investments – which may put at risk the long-term climate targets. Hence the Commission proposes in the Climate Market Report 6 measures that could structurally modify the EU ETS (still in the 3rd Trading Period) in such a way that the carbon price increases.

Also in this field EuLA has taken position and rejects any intervention in the carbon market. The low carbon price does not put at stake the achievement of the GHG reduction target, which is the first objective of the EU ETS. EuLA emphasises the need for creating a stable investment climate while the focus should shift from 2020 to 2030 and beyond. EuLA's position paper was submitted to DG Climate Action. EuLA also participated in two stakeholders meeting on 1 March 2013 and 19 April 2013 – where it became clear that the pressure on the Commission to actually intervene in the Carbon Market is huge.



2.2. Industrial Emissions Directive (IED)

2.2.1. BAT conclusions

Already since the transformation of the IPPC Directive into the Industrial Emissions Directive it was clear to EuLA that the Commission may want to have BAT Conclusions adopted on the basis of the existing CLM BREF. If BAT Conclusions were to be adopted, the BATAELs in the CLM BREF would become more binding, and would actually turn into Emission Limit Values (ELVs). However the IED gives Member States the possibility to grant exemptions to installations – but the conditions under which these can be granted have become more stringent.

As soon as the Commission's intention to derive BAT Conclusions from the CLM BREF was clear, EuLA has taken the initiative to bring together the colleagues from the cement and magnesium-oxide industries in order to develop a common legal opinion jointly with law firm "Field Fisher Waterhouse". EuLA's initiative resulted in a legal letter to DG Environment highlighting that:

- Industry's legitimate expectations in the adoption of the CLM BREF were not respected.
- The absence of a legal basis for adopting BAT Conclusions on the basis of an existing BREF.
- The fact that the current CLM BREF is incompatible with the new IED.

The letter was further discussed in a direct meeting with DG Environment with representatives from the lime, cement and magnesium-oxide industries where the Commission reassured EuLA that the "spirit" of the IPPC negotiations should be kept.

EuLA, under the chairmanship of Martin Haworth, has actively participated to make sure that the final adopted document does not change the technical content of the CLM BREF. EuLA followed the new Seville process till the end. According to the Directive (Art. 13 and Art.75), special committees composed by Member States representatives will be formed to follow the subject. Three important meetings took place on the issue: the Technical Working Group in Sevilla in May 2012, Art. 13 Forum in September and Art. 75 Committee in November.

After the Art. 13 Forum under the IED meeting which took place on 13 September in Brussels, the BAT Conclusions document entered in the inter service consultation phase within different Directions General of the European Commission. The document issued by the inter-service consultation fully respects EuLA's comments. According to Art. 75 of the IED, the Commission shall be assisted by a committee. The committee has the competence to deliver opinions on implementing acts concerning the following: guidance under Art. 13(3)(c) and (d) of the IED, BAT conclusions (Art. 13(5)), implementing rules for large combustion plants (Art. 41) and the type, format and frequency of reporting by Member States (Art. 72(2)). The Art. 75 committee met on 20 November and reiterated the opinion of the Art. 13 Forum. Best Available Techniques (BAT) conclusions, adopted under Directive 2010/75/EU, for the production of Cement, Lime and Magnesium Oxide are published in the Official Journal of the European Union (OJ L100, 9.4.2013).

2. Policy areas of major interest for the lime sector

2.3. Chemical policy / REACH / C&L

Activities of the EuLA Product Stewardship & Regulatory Task Force (EuLA PSR TF).

2.3.1. Biocides

The Secretariat is in continuous contact with the UK HSE. During the last quarter of 2012, EuLA prepared an information package to better describe the handling of lime for the Product Types covered by the EuLA registration dossiers. The information was sent to the UK HSE on 17 December 2012. The UK HSE has confirmed receiving this information and admitted that more time is needed to properly assess the information that EuLA has provided. Additional information on the specification of lime substances has recently been requested. There is no indicative timeline on when the lime dossiers will be discussed at the Biocides Technical Committee.

Art. 95 Notification requirements: The new Regulation (EU) No. 528/2012 concerning the making available on the market and use of biocidal products will be applicable as of 1 September 2013. This regulation outlines the obligation of applicants of a biocide dossier to notify to ECHA by this date. The purpose of the notification is for ECHA to publish a list of persons who have made a submission. Only biocidal products formulated with substances coming from those people will be allowed to be placed on the market as of 1st September 2015. EuLA Members will receive an information package on the obligations and actions that need to be taken from their side shortly.

2.3.2. C&L Inventory and Platform

The EuLA PSR TF closely monitors the ECHA C&L Platform since its launch (February 2013). The platform is an online discussion forum that allows registrants and notifiers of substances to the ECHA C&L Inventory to fulfill their obligation to agree on a (self-) classification for a substance when multiple classifications have been notified for this substance. No significant additional data is expected to be provided in this exercise. For the moment, EuLA will not actively start any discussion in the platform.

2.3.3. Nanomaterials

The IMA Nano WG has developed three different statements for members to be used in communications to third parties if they are asked whether they produce nanomaterials – based on the specific properties of their substance(s). One of these statements has been identified as relevant for lime substances and has been duly adapted. Upon approval of the EuLA Board, members will be informed and invited to use this statement when appropriate.

2.3.4. Chromium VI measurements

EuLA Members have been reminded about the importance of measuring CrVI in lime substances. In this sense, a memo has been prepared, which outlines the consequences of having a high CrVI content in products. A methodology based on the standard for cement EN 196-10 has been developed for lime substances; it also includes guidance on the preparation of samples. EuLA Members are called to, in confidence, share their tests results with the Secretariat in order to build a database on the common CrVI content of lime substances.



2.3.5. IMA Dust Monitoring Protocol

The EuLA PSR TF has worked on the adaptation of the Dust Monitoring Protocol (DMP) to the specificities of the lime sector. As part of this exercise, additional guidance on the collected sample analytics has been prepared. A new job function – “Hydration Operator” – has also been identified as specific to lime manufacturers and will be included into the DMP upon formal agreement of the IMA OSH WG.

2.3.6. Revision of lime e-SDS

The e-SDS for six lime substances have been updated and are available on the IMA REACH Hub. The new version takes into account the feedback received from members, competent authorities and the latest ECHA guidance. The Secretariat is currently working on guidance about the preparation of SDS for mixtures.

2.3.7. Food additives

EFSA (European Food Safety Authority) has been collecting data on intrinsic properties for all food additives permitted in the EU before 20 January 2009 (as it is the case for Calcium oxide and Calcium dihydroxide). EuLA submitted an information package on 21 December 2012. Additional information may be submitted during 2013.

2.3.8. CLP and Advertising

Art. 48 of the CLP Regulation (Classification, Labelling and Packaging of substances and mixtures) requires to mention the hazard categories of a hazardous classified substance in any kind of advertisement. In order to be compliant with this requirement, a generic statement has been prepared, which will be used in EuLA Brochures, leaflets and similar documents. EuLA Members are reminded of this requirement and invited to use this statement – with relevant amendments – or similar as appropriate.



3. EuLA specific projects

3.1. EuLA strategy

One of the objectives that the Board has set to the new Secretary General was to deliver a strategy by the end of 2012 to help positioning lime at EU level and propose a way forward for the sector in a highly challenging economic and regulatory environment, and position it as a sustainable, responsible and innovative industry. For European companies it is essential to operate in a predictable EU policy framework, which integrates climate protection, energy security, as well as competitiveness concerns. In the Europe 2020 Strategy, EU strives for a smart, sustainable and inclusive economy. The lime sector should find its position there.

After having performed a SWOT analysis of the sector, the mission of EuLA has been reshaped as well as the vision for the sector. The strategy also sets strategic goals and objectives and establishes a concrete action plan to make it happen. In order to ensure an optimised Secretariat support, the liaison and the modus operandi with IMA-Europe has also been tackled.

The proposed strategy has been reviewed by the chairs of the Committees and the Bureau, and has been presented and approved by the Board during its meeting on 18 December. It has also been presented during the joint committees meeting in May 2013. It will be presented to the entire membership at the General Assembly in June 2013.



3.2. Roadmap for lime

Following the publication of the three Roadmaps by the European Commission, the EuLA Board has decided last year to elaborate its own to define the path towards the future of the lime industry. The Board at its meeting of 26 September 2012 has approved the way forward as proposed by the secretariat. The Roadmap development is handled as a project with three phases.



During the first phase period, the available data have been gathered and processed for coherence purposes by an external consultant. A gap analysis has been performed and gaps in data have been identified. The gathered data have been gathered in the form of a background paper. The second phase consists in challenging the background paper and its ideas via a workshop moderated by an external person who will stimulate the debate and challenge the sector positions... The choice of the external moderator has not yet been made. The workshop may take place early in summer this year.

The third phase starts right after this workshop where a copywriter will shape the messages and deliver the final paper which is expected to be ready by the end of 2013. An ad hoc Task Force has been formed and is working on a first draft. The main messages to convey are also being drafted. The Board will decide on the date of the launch and the related communication plan upon proposal of the Secretary General.

IMA-Europe is also developing its roadmap in parallel focusing on Resource efficiency. E. Despotou is part of the IMA-Europe drafting committee in order to ensure the coherence between the two Roadmaps as far as process and content are concerned.

All the EuLA specific projects but also most of the policy developments are dealt with the support of technical industry experts through the three Committees active within EuLA, namely the **Technical and Environmental, Lime Applications and Standardisation** ones.

3. EuLA specific projects

3.3. GHG Standard

The lime industry decided to pro-actively work on a lime GHG performance standard to make sure that all lime specificities are appropriately considered.

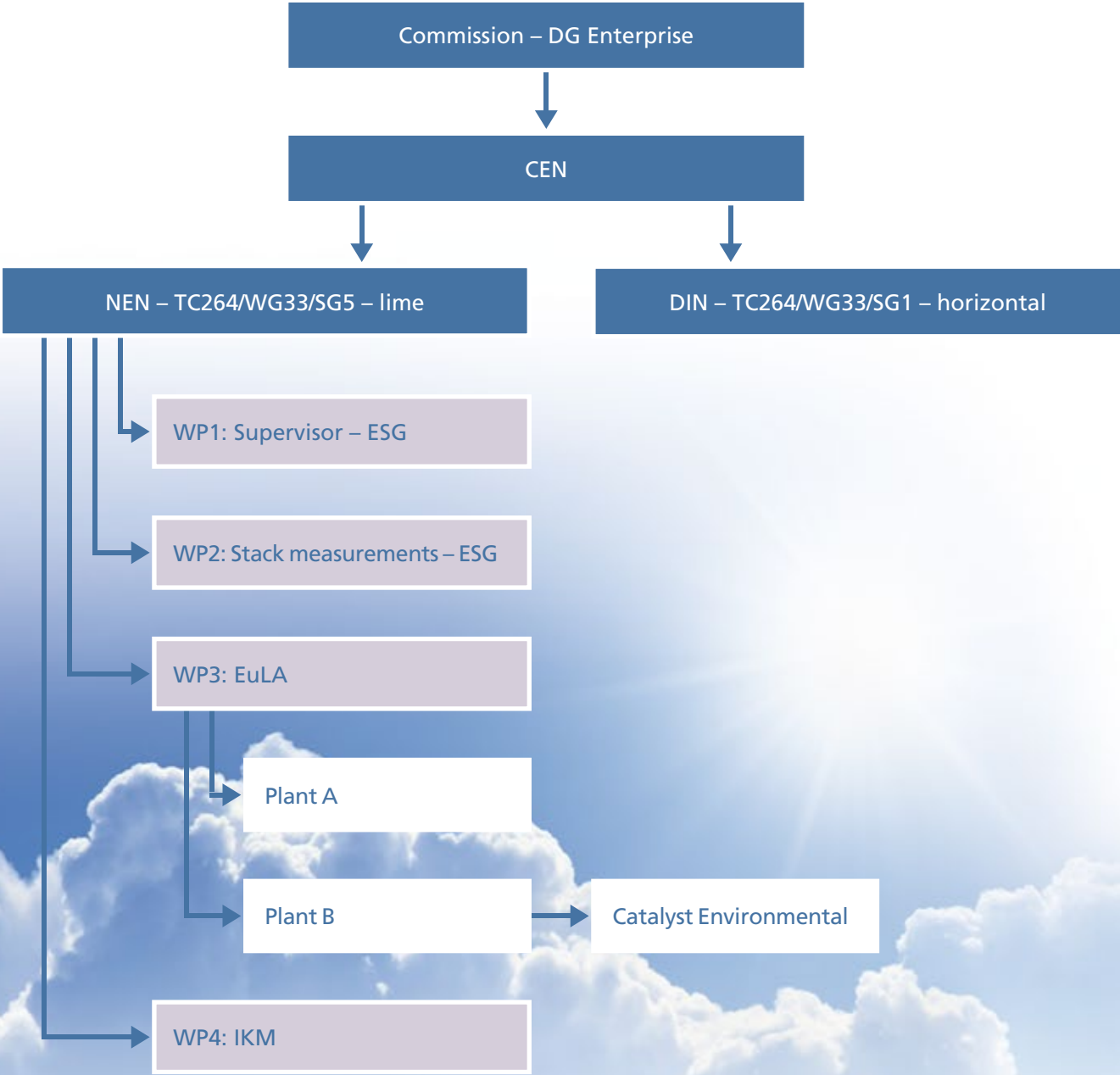
In 2012 much work has been done on the development of a lime GHG standard. The standard is now well advanced. Moreover good progress has been made in producing the draft method and in preparing the field validation trials to check the robustness of the standard. In 2012 the work of the EuLA Monitoring and Reporting ad hoc group, chaired by Mr. Martyn Kenny, led to the following major outputs:

- Decisions were made on the products, scope, boundaries and approach to be taken in determining GHG for the lime industry.
- A 79 page draft of the “Stationary source emissions – Determination of Greenhouse gas (GHG) emissions in energy-intensive industries – Part 5: Lime industry” is available.
- A field test protocol has been defined.
- A comprehensive tender proposal for field testing the draft standard has been prepared by EuLA and was issued for tender by NEN/CEN.
- The responses were reviewed and a selection report has been prepared and submitted to CEN / European Commission.
- The parties for carrying out the field tests to validate the lime GHG standard have been selected and contracts were prepared. EuLA has proposed 2 test sites and will also take a share of the work on board.
- Detailed on-site plans have been prepared for the field tests.
- Field tests are planned to begin before Summer 2013.
- An interim progress report was prepared and submitted to CEN.

The actual standardization work is followed by a subgroup 5 (SG5) under CEN/TC264/WG33 on “Greenhouse gas (GHG) emissions in energy-intensive industries”. The members of SG5 are mostly people affiliated to EuLA. Apart from lime – specific subgroups have been set up for steel, aluminum, cement and ferro-alloys. Each subgroup is entitled to a certain amount of subsidies from the Commission to organize a field test to validate its sector-specific standard. The lime industry can rely on total funds of 320.000 euro. In addition to the sector-specific groups – a horizontal subgroup (SG1) was created to integrate all common aspects in a horizontal standard. EuLA is actively involved in SG1 which mostly meets in Düsseldorf.

The field tests will be run throughout 2013 and 2014. Several partners have been selected to take care of each of the different work packages (WP) as can be seen in the diagram below. The field tests will consist of a comparison of the uncertainty of a mass balance based calculation method with the uncertainty linked to stack measurements.





3. EuLA specific projects

3.4. LCI / LCA

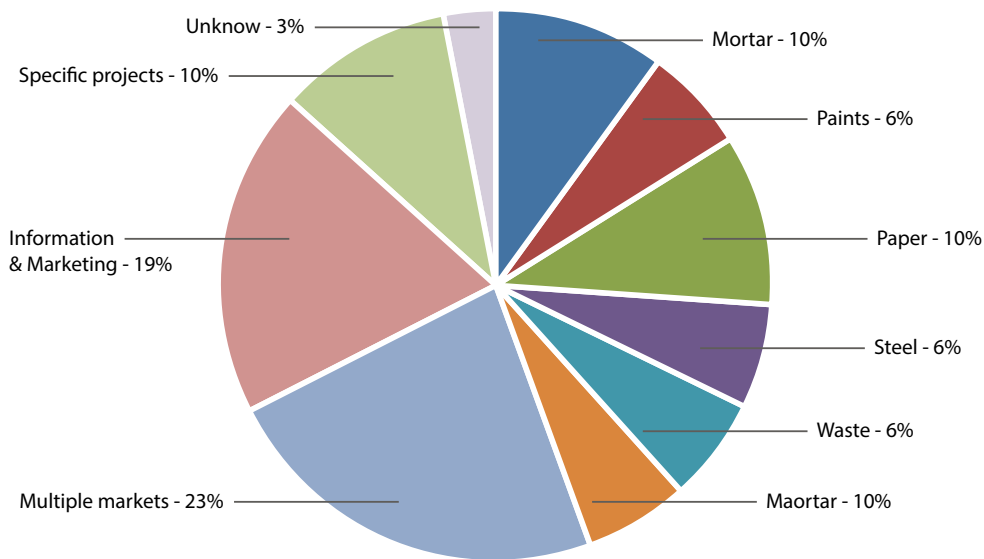
3.4.1. EuLA Life Cycle Inventory (LCI)

Publication in ELCD: EuLA LCI datasheets have been submitted in May 2012 to the European Life Cycle Database (ELCD) managed by Joint Research Centre (JRC). JCR has confirmed that the publication of the EuLA LCI data will be finalized shortly within ELCD III version.

External Communication: EuLA attended the LCA symposium organised by Society of Environmental Toxicology and Chemistry (SETAC) in Denmark with one poster presentation on the LCI of hydrated lime and quicklime.

Website has been updated with relevant information. Communication packages have been prepared for EuLA Members and non members and are delivered upon request. So far more than 30 requests have been received from various consultants, universities and companies for EuLA LCI data.

Summary of the requests (shared by market/need) for the EuLA LCI data.



Communication to members: A PowerPoint presentation on LCI aiming to be used as a training tool for the members on LCI issues is finalized. The presentation will be distributed when the market share data are revised with new data from the database and when the LCI is published in the European Life Cycle Database (ELCD).

3.4.2. EuLA Life Cycle Assessment (LCA)

The LCAs for Hot Mixed Asphalt, soil stabilization and mortars were finalised during 2012. The actions on communication are being elaborated and followed by the respective Task Forces.

External Communication: EuLA attended SETAC LCA symposium in Denmark with one platform presentation on the HMA LCA. Mortar environmental study and the carbonation in mortar will submit two abstract proposals for the International Masonry Conference to be held in Guimarage, Portugal, in July 2014.

Green Public Procurement (GPP) on road construction: The GPP revision process will be managed by European Commission Institute for Prospective Technological Studies (IPTS) in Seville. In view of making use of the data generated via the LCA studies in HMA and soil stabilization, EuLA has expressed interest in contributing to the revision of the GPP criteria for the road construction. Five experts from lime manufacturing companies and one person from the Secretariat will ensure the EuLA contribution.

Publication: The HMA LCA study is submitted for publication to be published in the International Journal of Life Cycle Assessment, a peer review journal by Springer. The communication of the Soil stabilization LCA is under consideration under the sustainable construction theme. Upon EuLA Board approval, the Asphalt Task Force, with the support from EuLA Secretariat, will further follow the submission and the publication process.

Lime Carbonation: It is agreed that carbonation and recycling rate in LCA on lime will be integrated in the future LCA studies on different lime applications when possible. The study for the Lime carbonation in mortar is ongoing. Abstracts should be submitted before end of June 2013.

The work for the LCI / LCA projects is performed in various TF respectively chaired by J. Danvers (LCA TF); C. Denayer (ATF); F. Verhelst (MTF) and secretariat support A. Shtiza.

3.4.3. Communication strategy LCI / LCA

In order to effectively communicate the results from the LCI / LCA studies carried at EuLA, a communication strategy has been elaborated and submitted to the members of the Task Forces for comments. The implementation of the communication strategy is ongoing, with target audiences such as policy makers (European Commission); technical (Universities, Applications, scientific meetings) and marketing (at company level) being the main focus. The table below indicates the main actions undertaken to fulfil the communication of LCI / LCA results.

Project	EuLA LCA TF and Board decision to communicate	ELCD publication	European Commission	PowerPoint (members, website)	Peer review publication	EuLA Attends Congress (C) / Symposium (S) / Meeting (M)	S11 study (Sustainability Indicators)	Carbonation
EuLA LCI	Yes	Ongoing	Yes 11.2012	Finalized 07.2012	–	LCA S: Poster 11.2012		
LCA Water softening	No					–		
LCA HMA	Yes		GPP: For road construction	Finalized 06.2012	Submitted 03.2013	LCA S: Platform 11.2012	Under consideration 2013	
Environmental footprint mortar	Yes					IMC: Two platforms 07.2012		Ongoing
LCA Soil Stabilization	ATF, LCA TF & Board: Under consideration		GPP: For road construction		Under consideration		Final 11.2012	

3. EuLA specific projects

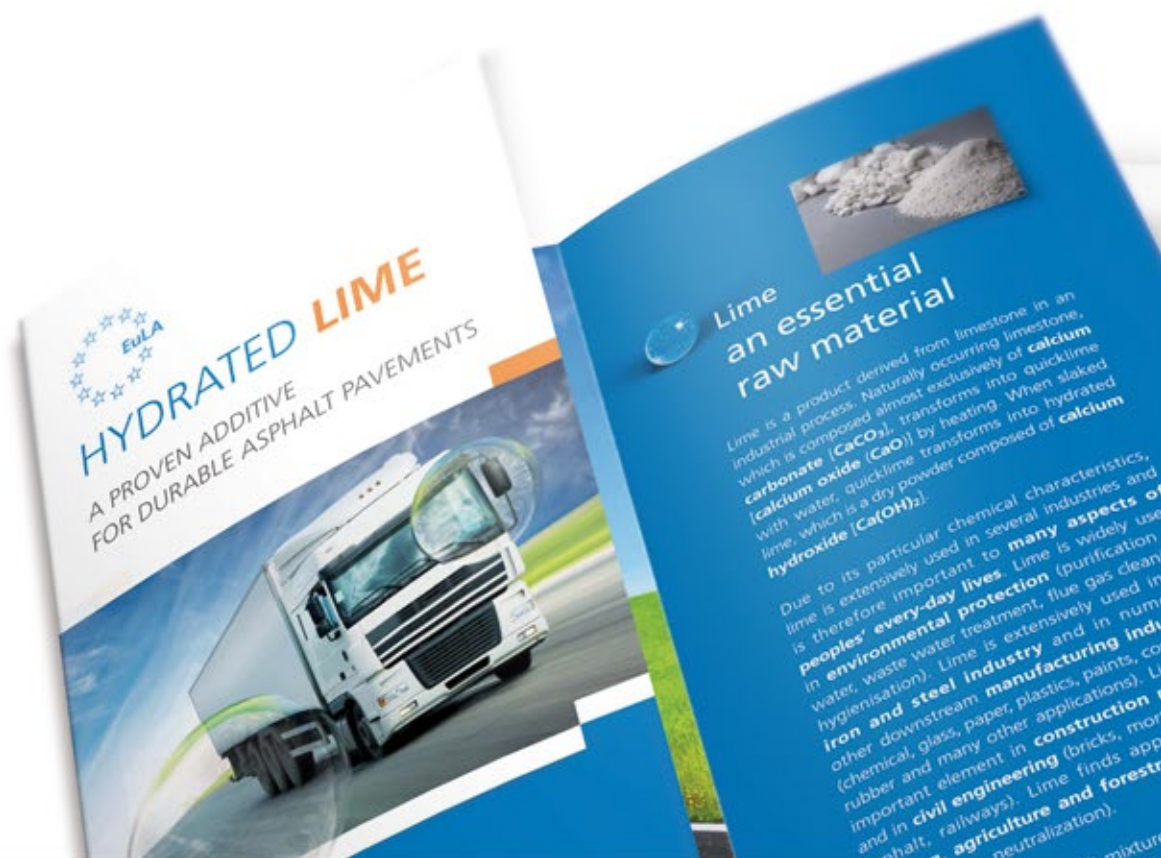
3.5. Lime Database

Also in 2012, EuLA collected data from its members for a number of common parameters. This second data collection round was organised in co-operation with PriceWaterhouseCoopers. The purpose of the data collection is to be able to take positions pro-actively – wherever possible and useful – to support upcoming advocacy activities, and to be able to derive trends.

Each year data is collected for a number of “environmental”, “economic” and “social” indicators. The results are presented in a consolidated EU-wide report, while each data contributor receives an individualized report which allows easy benchmarking of the data contributor’s results with the sector averages. Both “companies” and “associations” can contribute to the database.

For the 2012 data collection, 23 entities participated, representing 47 companies and 355 kilns. This is slightly less than for the 2011 data collection. Especially the coverage of the environmental report is rather high (between 80% – 90% of the estimated total EU-wide lime CO₂ emissions and production). For the market report, insufficient sales data were shared, so that the report could not be published. The representation of the social report is also considered as sufficiently high.

Also in 2013, EuLA will collect the 2012 data. Contrary to the previous years, the data collection will now be done in September 2013 so that the final reports are ready at the beginning of 2014.



3.6. Lime in asphalt pavement

The EuLA Asphalt TF declared 2012 “**Year of (hydrated) lime in hot mix asphalt**”. EuLA Members were invited to organize activities this year in their countries. They could rely on the massive number of articles, publications and support material prepared by the EuLA Asphalt TF.

EuLA itself participated in the **Eurobitumen and Euroasphalt Congress** in Istanbul in June 2012 with a EuLA booth, several flyers, and other promotional material. The different research results carried out by the EuLA Asphalt TF were also presented.

Daniel Puiatti retired this year as chairman of the EuLA Asphalt TF and was succeeded by Christophe Denayer. EuLA thanks Daniel for his continuous commitment over the past years to promote lime as a solution in asphalt applications.



3. EuLA specific projects

3.7. Lime in Mortars

The Mortar TF has finalized a **leaflet** on the use of hydrated lime in renders and mortars. The leaflet contains a specific information sheet for each target group: craftsmen, owners and designers. EuLA Members can order copies of the leaflet, and translate it in their national languages.

The Mortar TF also prepared an **FAQ** on the use of lime in renders and mortars, which is now available for download on the EuLA website. The FAQ contains more than 20 questions and answers on lime and mortars.

F. Verhelst, the TF chairman, took part in the **IB²MAC conference** in June 2012 in Brazil and made a presentation on behalf of EuLA on Sustainable Masonry. He presented the results of an article that he has co-written as chair of the TF with several scientists who took part in a EuLA Science-Industry Roundtable.

Also in 2012, EuLA organised a “Science-Industry Roundtable” bringing together both leading scientists and lime producers. The objective is to make a state of the art of the science in the field of lime in mortars, and to identify gaps. EuLA organised a first roundtable in 2009 in Dresden, a next one in Aarhus, and on 6 December 2012 a restricted roundtable was held in the IMA-Europe offices in Brussels. Several scientists were asked to prepare a position paper which was discussed in more detail.

The “EuLA Mortar Science ad hoc group” acts as a platform for exchanging information on the different ongoing tests related to the **revision of EN1015-11 and EN1015-12**.

The EuLA Mortar TF launched in July a project together with CERAM (UK) to identify the available **literature on hydrated lime additions** to cement based mortars.



3.8. Animal By-products and sludge

The aforementioned Task Force has elaborated a brochure dedicated to the use of lime in Animal By-products, sludge and manure, which has been finalised. A test on the biocidal effect of lime has been carried out by the University of Hohenheim. The results will also be included in the brochure.

3.9. Standardisation

In the course of this year, the chair of the EuLA Standardisation Committee (SdC) has changed. Due to a change of position in his company, Siegmund Lüger had to resign from the position, and Steve Foster (Singleton Birch Ltd) kindly accepted to take over, and chaired his first SdC meeting on 6 March 2013. The Committee warmly thanked S. Lüger for his dedication and his excellent work as SdC chairman over the last years.

In addition to the usual review of activities of the CEN Technical Committees of interest, and in particular of CEN TC 51 (cement and building limes), the SdC this year focused its discussion on the sustainability aspects of the Construction Products Regulation, and more particularly the Product Category Rules (PCR) and Environmental Performance Declarations (EPDs). Such Environmental Performance Declarations for construction products might become compulsory within a period of 5 years.

Another important activity was to develop templates of Declarations of Performance (DoP) for the various building lime products, and templates of new CE-markings which were circulated to all EuLA Members beginning of March 2013. Those DoPs and CE Marks (to be affixed on bags and delivery sheets) will be compulsory as of 1 July 2013. EuLA Members are regularly informed about the activities of the European Association for Construction Products, CEPMC, of which EuLA (via IMA-Europe) is an associate member, and which is heavily involved in those issues.

Last but not least, the SdC discussed the new Regulation on European Standardisation which was published in October 2012 (Regulation (EU) No. 1025/2012) on European standardisation. The Regulation entered into force on 4 December and has started to be applied from 1 January 2013. The regulation adapts the current legal framework to simplify it and to cover new aspects in order to reflect the latest developments and future challenges in standardisation.

The new framework should shorten the average time of the standard setting process, and facilitate representation and participation of small and medium-sized enterprises (SMEs) in the standardisation process. It also plans for a greater involvement of consumer and social organisations in standardisation activities.

Standards will require to take account of environmental impacts throughout the life cycle of products and services (Recital 36), as well as climate change and resource-efficiency objectives (Recital 19).

4. Communication

4.1. Political communication

To advocate its positions on the different policy dossiers, EuLA all over the year has produced different **position papers, press releases and letters** to policy makers to alert them about the lime industry position. In order to strengthen its voice, EuLA is member of the **Energy Intensive Industry Alliance (EIIA)** which gathers major industries sharing similar concerns with the lime industry, such as the chemical, steel, cement, glass, aluminium, paper, oil industry etc. The (EIIA) members represent all together more than 30.000 enterprises and directly employ more than 2.5 Million people in the EU.

EuLA is a valuable stakeholder for consultation when it comes to issues mainly related to climate, energy and environment topics. Thus it participates in most of the **public consultations** that the European Commission launched that are relevant for the sector.

Furthermore, participation at relevant **EU conferences** can be the right vehicles to promote positions of the industry. EuLA Secretariat attended events of the European institutions, but also other sectors events linked to the policy priorities, such as several ones related to ETS, the launch of the Ceramic and paper sectors Roadmap, the cement industry event on cement contribution to a sustainable future, EU steel day etc.



4.2. Visibility

4.2.1. EU Transparency Register

Following up on the board approval, EuLA has been registered in the EU Transparency Register of the European Union with register number 780146710855-91. This action however does not change the EuLA status; it gives visibility to the association and its positioning, and confirms that the lime industry acknowledges the code of conduct of trade associations and “plays by the rules” in the EU advocacy arena. It also enables members of the Secretariat to have a permanent access to the European Parliament.

4.2.2. Membership to CEPS

In addition, in order to participate in think-tanks Platforms which shape positions on the different policy areas, EuLA became member of CEPS, a well known think-tank in Brussels. Our interest in this entity comes from their influence and expertise on the climate change.

4.2.3. Participation in the IMA-Europe Conference

EuLA has participated with a speaker in the IMA-Europe conference in November in the European Parliament. The presentation was focused on emissions processes and improvements that the lime industry is performing in order to be more energy and resource efficient.

4.2.4. Participation in the SETAC Conference

EuLA has participated in the scientific conference SETAC in Denmark with an oral presentation on Life Cycle Inventory (LCI) for hot mixed asphalt and a poster presentation on (LCI) quick lime and hydrated lime.

4.2.5. Brochures

Promotion material like brochures, such as **LCA, mortars, hydrated lime for use in the hot mixed asphalt**, general **EuLA presentation**, but also more technical information sheets such as the **recycling** one (which is part of the IMA-Europe recycling sheets of the whole mineral portfolio) have been produced with the expertise and the support of the dedicated Task Forces.

Some of the promotional material is already translated in different EU languages by some members in order to promote lime use in their national markets.



5. The following subjects are followed at IMA-Europe level

5.1. Revision of the carcinogens at the workplace Directive and Respirable Crystalline Silica Directive

The Advisory Committee on Safety and Health at Work (ACSH) released beginning of 2013 a positive opinion on the proposal of the European Commission to amend Directive 2004/37/EC on the protection of workers from the risks related to exposure to carcinogens and mutagens at work (CMD). On the basis of the work of the Chemical Working Party, the ACSH agreed on the need to include more binding Occupational Exposure Limit (OEL) values for a number of substances in the Annex III of the Directive.

Regarding Respirable Crystalline Silica (RCS), the ACSH agreed that a binding OEL at 0.1 mg/m³ is justified. However, it was recognized that there are different possible legal frameworks in which to include such a binding OEL for RCS, namely the Directive 98/24/EC on the risks related to Chemical Agents at Work (CAD) or the above-mentioned Carcinogens and Mutagens at work Directive (CMD). However, setting a BLV in the CAD poses problems regarding the timing and the procedures, as a revision of the CAD would require two consultations of the social partners of a duration of 6 months each.

On the basis of this ACSH opinion, the European Commission services will now prepare an impact assessment study on the revision of the Carcinogens or Mutagens at Work Directive which should be ready at the end of 2013. This impact study is the last step before the drafting of the Commission proposal. In this impact assessment, the Commission will examine what is correct – what is realistic and what is achievable in practice for RCS, and for the other substances. Input from concerned stakeholders is welcome by September 2013 at the latest. IMA-Europe will co-ordinate this input.

5.2. The European Innovation partnership on Raw Materials

Aiming at contributing to the 2020 targets of the EU Industrial Policy, the European Innovation Partnership on Raw Materials (EIP RM) was launched in January.

Its Strategic Implementation Plan (SIP) will be endorsed mid-July, with a Commission Communication to be published by November and adoption end of 2013 by the Council. The first round of the EIP five Operational Group (OG) meetings was held in February after validation by the Sherpas and the High Level Steering Group (HLSG) of the EIP scope, objectives, targets and governance.

IMA-Europe has appointed representatives from the Industrial Minerals industry in the various EIP governing bodies: a CEO in the HLSG, the IMA Secretary General in the Sherpa Group, and IMA company experts in four of the five Operational Groups of experts in order to contribute to the steering of the process and provide input which will influence the SIP drafting. Damien Grégoire is one of the IMA appointed expert in the OG3 aiming at defining an improved framework for land planning and mineral policy through exchange of best practices.

France, Sweden, Austria, Greece, Germany, Poland, Spain, the Czech Republic, Italy and Belgium government representatives are active in the EIP. Some of those Member States have set up mirror groups at national level (e.g. France, Austria) and IMA coordinates with the national federations and companies involved.

Finally the IMA European Minerals Day 2013 edition has been selected by Commissioner Tajani as one of the two communication vehicles of the EIP RM (see EMD paragraph). For more details, please ask the IMA Secretariat for the slide presentation "The EIP RM in a nutshell" and the "Composition of the governance groups".

5.3. Environmental Impact Assessment Directive (EIA)

Based on the need to revise the Environmental Impact Assessment (EIA) Directive, the European Commission launched a public consultation from June to September 2010. The Feedback from the consultation was provided by citizens (50.1%), organizations/companies (35.1%) and public authorities and administrations (14.8%).

From the EIA consultation, the shortcomings and actions for revision were defined as below:

- Simplify and harmonize screening procedure in various MS.
- Simplify existing EIA procedures (i.e. screening).
- Reinforce the quality components of the EIA process (e.g. content of the report, alternatives, review of EIA information, monitoring, validity EIA).
- Public participation and reasonable time-frame consultation.
- Need to improve synergy between EIA with other EU Directives (Strategic Environment Assessment (SEA), Industrial Emission Directive (IED), Habitat/Bird directive, Climate change, Biodiversity, etc.).

Based on the consultation feedback the European Commission (EC) made a legislative proposal COM (2012) 628 final on 26 October 2012. After a careful assessment of the proposal, IMA would strongly support the addition of the definition of EIA (Art. 1); and the one-shop-stop proposal (Art. 3). However IMA has serious concerns that the rest of the proposal has unclear scope (Art. 3); will result in additional financial burden and delays (Art. 5, par. 3), inconsistent provisions (Art. 6; Art. 7, par. 5); will duplicate obligations which are already implemented in other legislations such as Industrial Emission Directive (IED) (Art. 8; Art. 9); will empower the EC to adopt delegated acts without Council and European Parliament (EP) consultation.

The EIA will be discussed in the ordinary procedure involving EP-Council (former Co-decision). In order to align industry position, IMA-Europe is working closely with the Non-Energy Extractive Industry Panel (NEEIP) and BusinessEurope to prepare respective positions. Some necessary lobbying action at the EP, are also foreseen in order to bring forward our concerns and inform the EP members on direct consequences that EIP proposal will have on European industry.

The legislative proposal has been published in October and is expected to be adopted in 2014, entering into force in 2016.

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5. The following subjects are followed at IMA-Europe level

5.4. Transparency and accounting Directives

On 25 October 2011, the Commission released a proposal for a directive amending Directive 2004/109/EC on the harmonisation of transparency requirements in relation to information about issuers whose securities are admitted to trading on a regulated market and Commission Directive 2007/14/EC; and a proposal for a directive on the annual financial statements, consolidated financial statements and related reports of certain types of undertakings.

The first proposal comes as an answer to the US Dodd Frank Act introducing new rules on disclosure of payments by resource extraction issuers, as published by the Securities and Exchange Commission aiming to improve transparency and promote sustainable business among multinationals. Mining and forestry companies would have to be more open and declare taxes, royalties and bonuses paid to the governments worldwide. The difference between the Dodd Frank Act and the EC proposed directive is that the EU proposal goes far beyond. Especially, the EU rules would apply to large unlisted companies, as well as listed companies, whereas the US rules are restricted to listed extractive companies only.

The European Parliament widens the scope by introducing additional sectors, namely, the telecommunications, construction and banking, and reduces the proposed thresholds amounts for reporting. IMA-Europe has developed a position paper that promoted this through the Raw materials high level group at national level. (The paper is available upon request at the secretariat). The directive on Transparency requirements is dealt at very high political level and even though country representatives understand the burden that may be created for the industry, the margins for manoeuvre to influence are very limited, as nobody wants to be perceived as not supporting transparency. The procedure for adoption is the Ordinary procedure (Former Co decision) awaiting first reading agreement. The plenary vote in the Parliament is expected in May 2013, potentially entering into force in 2015.

5.5. Waste legislation

5.5.1. Mining Waste Directive

Some of the provisions foreseen in Art. 22 of the Directive are still being discussed and to be adopted: standardized sampling and analysis methods (CEN) – only need to be officially adopted.

Technical guidelines for inspections – involvement in a working group (WG) with Member States, industry and the Commission. The WG aims at developing guidelines for inspection of mining waste facilities, and an inventory and rehabilitation of abandoned facilities. Although the work of the Consultants has been finalized, it seems that the Commission is not happy with the results. The conclusions have not been shared with the stakeholders for final comments yet (it should have been done by end of 2011).

The Commission wants to prepare a Decision on the main aspects of the guidelines. Its content is still unknown, as the content of the guidelines has also not been finalised. The WG also assessed the possibility of updating the BREF on Management of Tailings and Waste-rock in Mining Activities. The timing is not clear. In the last IED Art. 13 Forum it was mentioned that the review of the BREF may be undertaken by the JRC, and not the IPPCB (to be followed up).

5.5.2. List of Waste (2000/532/EC)

It concerns the review of the hazardous properties (HP) listed in Annex III of Waste Framework Directive 2008/98/EC as well as the thresholds for these HP in the List of Waste to align them with the CLP Regulation.

Of concern for EuLA: HP 4 Irritant – while there have been discussions related to the threshold for H318 Eye damage 1 (proposed 1% vs. current 10%). After thorough discussions, the Commission has taken on-board EuLA's comments and has maintained a 10% threshold level in the final draft circulated to the various member states experts. Adoption of these amendments is expected in 2013, entering into force in June 2015 – to allow stakeholders (competent authorities, companies, etc.) enough time to adapt to the new legislation.

5.6. Occupational Health and safety

Improving the accidents frequency rate in the industrial minerals sector was agreed as a top priority issue for 2013 by the IMA-Europe Board. The IMA Board agreed that an overall Lost-Time Incidents Frequency Rate (LTIFR) of 12 for the sector is far too high. The IMA Board has therefore agreed on an IMA-Europe **inspirational target of zero injuries to be reached in two phases:**

- **A 50% reduction in the IMA LTIFR by 2016 (i.e. from 12 to 6).**
- **A further 50% reduction by 2020.**

To obtain the commitment of the top management of member companies for this strategy, a personal letter will be sent to all IMA-Europe CEOs by the IMA President, Mr. Daniel Reuss, asking them to **sign a declaration to mark their personal commitment to a zero injury culture in the industrial minerals industry.**

This accident reduction strategy will be discussed and presented on the occasion of a Workshop dedicated to Health and Safety, kindly hosted by the company S&B Minerals on the island of Milos on 7-8 October 2013. EuLA Members are warmly welcome to participate in this workshop and to join the IMA accidents improvement strategy. We also strongly encourage all EuLA Member companies to provide their social data through the EuLA database so as to have a complete and accurate picture of the situation of the sector on which to base improvement efforts.





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