



31.7.2023

The Finnish Mining Association FinnMin appreciates the opportunity to present our perspective on the matter.

In our letter to the European Commission, we underline the importance of clear commitment to ensuring that high environmental and social performance standards are met. We believe that high ESG-standards in any critical minerals policy is fundamental to the success of mining activities. FinnMin has been implementing the globally recognized [Towards Sustainable Mining](#) (TSM) standard, which is not only applied for mining, but also for exploration in Finland.

We see that voluntary sustainability schemes provide a preemptive way for companies to respond to the demands of different stakeholder groups and for the development of new best practices. We have been implementing the TSM standard in Finland to help our member companies to continuously improve and measure their sustainability work and to report on the measures taken. We see that commitment to sustainability standards are also a tool for assessing and mitigating risks.

Industrywide programs and sustainability schemes help organizations develop their practices in a faster pace and to consider more specific material issues. Our industrywide requirements go beyond what is required by law and we expect the sustainability work to be verified through third parties.