

To the President of the European Parliament & Members of the ITRE Committee
To Teresa Ribera Spanish minister for the ecological transition and the demographic challenge &
Permanent Representatives of the member States of the Council of Europe
To the President of the European Commission & the College of Commissioners
via email

16. November 2023

Dear President Metsola and Members of the ITRE Committee,
Dear Minister Ribera and Permanent Representatives
of the member States of the Council of Europe,
Dear President von der Leyen and Commissioners,

The signatories of this letter are grassroots and civil society organizations, movements, recognized Indigenous Peoples in the European Union, local community groups, academics and experts. We have direct experience in assessing the true and often hidden costs of mining including its impacts on people, the environment, good governance and the rule of law.

Due to the serious shortcomings outlined below, we request the withdrawal of the Critical Raw Materials Act (CRMA). We reject the misleading policies at its base including its failure to understand the implications of corruption, the absence of communities' Right to Say 'No' and of rights of nature as well as its legitimisation and support of manipulative "social acceptance" and mining certification schemes that breach fundamental citizens' rights and research ethics.

Instead we demand environmental and climate policies that reduce raw materials demand, energy use and faulty land management schemes. Increasing mining by breaching fundamental rights, even for the 'environment' or to 'mitigate climate change', will only worsen climate and ecological conditions and social conflict.

The Act does not address corruption, which is known to be endemic to mining

Across the world, undue influence of mining led to an erosion of the quality of governance; spreading corruption and accentuating local power asymmetries. Governments wrongly merge the interests of mining corporations with those of the general public. Meanwhile this forfeits real mitigation pathways for climate change and the environment.

The recent news in Portugal, where several companies, high-ranking politicians, and public entities are being investigated for alleged corruption related to the attribution of two lithium concessions, led to the resignation of the Prime Minister António Costa. Savannah Resources and Lusorecursos, the owners of the two concessions, will no longer participate in the *Raw Materials Week 2023 (RMW)*.ⁱ The investigation has brought political uncertainty and instability to the country and illustrates that Europe is not immune to the all too present connection between mining and corruption. This is not an exception - across the EU there exist countless cases of corruption and misconduct related to mining, even if they have rarely been brought to justice or received due public attention.ⁱⁱ

Purporting mining as a 'climate solution' and mining companies as 'climate champions', the CRMA will waterdown laws, fast track procedures and inject billions of taxpayers euros into speculative and reckless mining. For so-called 'strategic' raw materials (copper, lithium, nickel etc.), the CRMA foresees fast permitting by limiting public consultation periods and shortening the time citizens have for a fair trial to defend their rights.

This runs against human and environmental rights such as the right to public participation in decision making on environmental matters and the right to access justice. Other fundamental rights, including the right to housing, are breached in areas where new mines involve forced evictions, while eroding our food sovereignty and the rights of farmers, peasants and other people working in rural areas.

The CRMA will not only extend **bad governance** across Europe, but exacerbate it globally by allowing the designation of strategic projects outside of the EU, including on Indigenous lands. EU institutions have refused to modify the CRMAⁱⁱⁱ to include legally binding Free Prior and Informed Consent mechanisms. This is in breach of international conventions on Indigenous Rights. The Sámi people of the Sápmi region in Norway, Sweden, Finland, and Russia are recognized Indigenous Peoples in the European Union, and mining causes irreparable damage to their way of life.^{iv} We need regulations that offer legally binding protection to Indigenous Nations and legalize the Right to Say 'No'. We do not need tokenistic advisory roles for communities impacted by mining inside and outside the EU's borders.

A “Social license” to harm, destroy and violate European fundamental rights and ethics

There is nothing socially acceptable about the scramble for raw materials. Many of us are directly affected by environmental and social non-compliance of the extractive sector. We have never given any company the permission to extract or explore in our communities or to transform our lands into **sacrifice zones** in the name of perpetual economic growth.

We reject policy proposals that seek to manage resistance through “facilitat[ing] public acceptance” (CRMA) or by industry-coined procedures to gain a **social license to operate** (SLO). If not backed by Free, Prior and Informed Consent dialogue at community level, we consider “social licensing” and any related influence on public perceptions by public authorities or corporations, a procedural euphemism for **social engineering** and ‘soft’ counter-insurgency. They only serve to brush off legitimate objections to instances of corruption, or projects that fail to comply with environmental and labor laws. A subgroup on public acceptance that is part of the CRMA’s Critical Raw Materials Board is insufficient. It does not resolve the violation of citizens’ rights impacted by Strategic Projects.

The Commission’s goal of “[c]hanging public opposition to passive tolerance or active support” runs against European ideals of democratic participation.^v It will erode the public’s trust in the European project by diminishing efforts made toward a just and sustainable future for all. We refuse a law that promotes passive tolerance to socio-environmental harm, corruption and labor abuse, which existing public funding schemes are already reinforcing. The Horizon 2020 (2014-2020) and Horizon Europe (2021-2027) programmes contain at least 25 projects with a total budget of €181M which include deliverables that seek to organize public acceptance for extractive projects in member states and beyond.^{vi} These misleading publicly funded initiatives refuse scrutiny by the very public they intend to influence. There is a need for an inquiry into the Commission’s research requirement to “impact[ing] public awareness and acceptance and trust in mining operation.”^{vii} The signatories of this letter consider the Commission’s funding and the participation of public authorities’ in such applied research an illicit interference on the opinion of individuals, and a violation of article 11, section 1, of the Charter of Fundamental Rights of the European Union (CFR) and article 10, section 1, of the European Convention on Human Rights (ECHR). Furthermore, the ethics management and board of at least one Horizon Europe project does not fulfill the ethical standards set out for the Horizon Europe Framework Programme.^{viii} Thus, the signatories ask the Commission for an independent assessment of the 25 projects.

The EU invested millions of taxpayer euros into research on how to generate “social acceptability” for mining operations, some of which proved to be involved in criminal activities. For example, in 2016 three executives from the Cobre Las Cruces copper mine in Spain were sentenced to a year in prison and fined 293,000 euro for environmental crimes after polluting Seville’s aquifer with arsenic.^{ix} Since then the company has been repeatedly fined for damages to water bodies, yet it was awarded a 26,7 million euro subsidy and has benefited from half a dozen Research Projects under the Framework Programmes worth millions of euros.^x

Social acceptability efforts violate democratic regulations and due process. They generate misinformation, and obstruct transparency. They hinder the possibility of legal action against non-

compliance with environmental, administrative or labor laws. And social acceptability efforts advance corruption.

Europe's mining regulations are dangerously obsolete

With statements such as mining “in the EU is subject to the highest environmental and social standards worldwide,”^{xvi} EU institutions like to assure citizens that its mining legislation is the most advanced in the world. This is false.

Tailing dams illegal in Brazil, Chile, China, Ecuador or Peru are being advanced as ‘best available techniques’ in Spain and Portugal.^{xvii} For example, the Touro copper proposal in Spain plans an 81-meter-high dam just 200 meters upstream from the village of Arinteiro. While Brazil and Ecuador prohibit tailing dams less than 10 km upstream from potentially affected communities and China prohibits them at a distance of less than 1 km, EU legislation imposes no restrictions. In Spain, 99% of tailings dams are built following upstream design,^{xviii} the most dangerous construction method – banned in Brazil, Chile, Ecuador or Peru.

Industry-driven negligence combined with policy makers' misjudgement of mining operations leads to obsolete regulations and a reluctance to implement ‘Best Available Technologies’ (BAT). This is extremely dangerous. This even more so as new ‘low-cost’ mining projects seek to develop large mines with lower ore grades to mine conventional metal (e.g. copper) as well as minerals such as lithium. They will create waste facilities of unseen dimensions that in return come with significant risks. Mining lower ore grades doubled the last decade, while costs and quantities of mining waste increased exponentially.^{xix}

Europe has seen too many major mine accidents.^{xx} **“Never again,” said Margot Wallström, the EU Commissioner after the Baia Mare tailing dam failure. Yet the sheer scope and pace of new mines, plus the untested nature of the accelerated permitting regime can only lead to accidents.** For example, the recently approved extension of the Rio Tinto tailings dam in western Andalusia, Spain, allows the storage of over 360 million tons of highly toxic sludge. In comparison, the 1998 Aznalcóllar disaster involved the release of ‘only’ 6 million tons. We refuse to accept a law that we know will give rise to more accidents with incalculable consequences in terms of human lives and environmental damage.

We can't mine our way out of a perpetual growth syndrome

European policymakers have bought into the delusion that more mining will mitigate ecological and climate catastrophe. **Europe's target is to mine in the next 30 years as much copper as has been mined in the past 7,000 years.**^{xxi} It is to completely deplete known global reserves for nickel, cobalt, lithium and other minerals (under the premise that reserves will continue to expand indefinitely via deep-sea and space mining). Scientific consensus against deep sea mining has also shown the irreversible damage to ecosystems, potential toxic releases, biodiversity loss, and the unknown consequences on ocean health.^{xxii}

Yet, as ore grades dwindle^{xxiii} (for example, average grades in copper mines has gone from 1.8% in 1930 to 0.5% today), newly proposed mines create greater environmental impacts^{xxiv}, larger volumes of waste, larger energy demand and rising emissions, under the constraints of minimum low-cost safety standards. That is the opposite of ‘green.’

To meet Europe's target, its mineral demand forecasts are enormous: For solar and wind technologies demand for lithium, dysprosium, cobalt, and neodymium are to be up to 600% in 2030 and up to 1500% in 2050 from 2018 levels. Batteries for electric vehicles and renewables will drive 2030 demand for lithium up by 1800% and cobalt by 500%, and drive 2050 demand up by almost 6000% and 1500%, respectively.^{xxv} These numbers do not take into account so-called ‘smart

technologies, other individualized electric mobility devices (e.g. scooters, bikes, etc.), energy infrastructure (transformers, HVPLs, etc.) and, in the end, relies on significant data gaps.^{xxi}

According to Simon P. Michaux, of the Finnish Geological Survey (GTK) “a case can be made that not only is current mineral production not high enough to supply the projected quantity demand for metals, but current global reserves are not large enough to meet long term consumption targets.”^{xxii} All this happens alongside new additions of low-carbon energy sources which are being built alongside already existing fossil fuel and nuclear energy sources on the European energy grid. European environmental policy, moreover, is furthering energy market privatization and entrenching the existing trajectory of uncontrollable energy consumption.^{xxiii} European environmental and climate policy is deeply flawed and leading to worsening ecological conditions. We need legal reforms based on energy and material reduction, not a law that feeds into the hands of the mining lobby.

EU treaties require that all EU decisions are taken as openly and as closely to the citizens as possible. The CRMA was intended "to collect evidence and views from a broad range of stakeholders and citizens." But given that it was rushed through at great speed by DG GROW, the documents put to public consultation were only available in French, German, and English languages, excluding significant segments of Europe's population.^{xxiv} This is a violation of our right to access to information and to participate in decision making in environmental matters enshrined by the Aarhus Convention to which the European Union is a signatory. We will take all legal steps to ensure redress because with the CRMA, EU institutions have again put the cart before the horse.^{xxv} We refuse another law that wants short term profit to the detriment of people and the planet. **It is for all these legal and ethical violations that we request the withdrawal of the Critical Raw Materials Act (CRMA).**

We look forward to reading your reply and remain

Yours sincerely,

Grupo de Geopolítica y Bienes Comunes, Buenos Aires, Argentina
“EcoLur” Informational NGO, Yerevan, Armenia
Attac Austria, Austria
Degrowth Vienna, Austria
CATAPA vzw, Ghent, Belgium
Observatorio Plurinacional de Salares Andinos, Chile
Fundación Tantí, Chile
Fundación Chile Sin Ecocidio, Chile
Fundación Protege Los Molles, Chile
Tasaarengu Eesti Organisatsioon, Estonia
WeMove Europe, Europe
Saimaa ilman kaivoksia ry, Finland
Ei kaivoksia Suomen käsivarten ry, Finland
Ei kaivosta Pyhä-Luostolle, Finland
Kansalaisten kaivosvaltuuskunta - MiningWatch Finland ry, Finland
Kaivoskriittinen kansanliike, Finland
Sokli erämaana ry, Finland
Sompion Luonnonystävät ry (The Finnish Association for Nature Conservation - local association for Savukoski-Sodankylä areas), Finland
Ylitornion - Pellon Luonto ry (local group of The Finnish Association for Nature Conservation), Finland
Vuohču Sámiid Searvi rs, Finland
Osikonmäen kyläyhdistys ry, Finland
Kolkontaipaleen kyläyhdistys ry, Finland
The Global Extractivisms and Alternatives Initiative (EXALT), Finland
Sámi Bálgosat rs (Association of Saami Reindeer Herding Co-operatives), Finland

Rajat Lapin Kaivoksille ry (Limits to Mines in Lapland Registered Association), Finland
Ass. Risteco - La Ville qui Mange, France
Association of Ethical Shareholders Germany
Hellenic Mining Watch, Greece
aHang Platform, Hungary
Védegyelet Egyesület/Protect the Future Association, Hungary
Clean Air Action Group, Hungary
Ökotárs-Hungarian Environmental Partnership Foundation, Hungary
International University College of Turin, Italy
Associação Cultural Amigos da Serra da Estrela - ASE, Central Region, Portugal
Associação Montalegre Com Vida, North Region, Portugal
Centro de Ecologia, Recuperação e Vigilância de Animais Selvagens (CERVAS) / Associação
ALDEIA, Central Region, Portugal
Movimento Seixoso-Vieiros: Lítio Não, North Region, Portugal
UDCB - Unidos em Defesa de Covas do Barroso, North Region, Portugal
Espaço A SACHOLA - Covas do Barroso, North Region, Portugal
Rede Minas Não, Portugal
Extinction Rebellion Guimarães, North Region, Portugal
Chaves Comunitária, North Region, Portugal
Grupo de Investigação Territorial (GIT), Portugal
Associação Povo e Natureza do Barroso - PNB, North Region, Portugal
AVE - Associação Vimaranesense para a Ecologia, North Region, Portugal
Movimento SOS Serra d'Arga, North Region, Portugal
Movimento Contra Mineração Penalva do Castelo, Mangualde e Satão, Central Region, Portugal
Rede para o Decrescimento em Portugal, Portugal
SOS - Serra da Cabreira, North Region, Portugal
IRIS, Associação Nacional de Ambiente, Portugal
Sciaena - Oceano # Conservação # Sensibilização, Portugal
Movimento Não às Minas - Montalegre, North Region, Portugal
Movimento Contra Mineração Beira Serra, Central Region, Portugal
Movimento Amarante diz não à exploração de lítio Seixoso-Vieiros, North Region, Portugal
FAPAS - Associação Portuguesa para a Conservação da Biodiversidade, Portugal
Grupo pela Preservação da Serra da Argemela (GPSA), Centro Region, Portugal
URZE - Associação Florestal da Encosta da Serra da Estrela, Portugal
Bravo Mundo - Citizens Movement for a Safer Future, Central Region, Portugal
Nao as Minas Beiras - Citizens Movement, Central Region, Portugal
MiningWatch Portugal, Portugal
Asociația pentru protejarea Munților Apuseni-Rovina, Vest Region, România
Independent Centre for the Development of Environmental Resources, Vest Region, Romania
Ecou Rovina București, București - Ilfov Region, România
Mining Watch Romania, Romania
Roșia Montană Community, Centru Region, România
Cărturești Foundation, Bucharest, România
Street Delivery, Romania
Comunitatea Declic, România
Asociația turistică sportivă civică și ecologistă “Clubul de Cicloturism NAPOCA” (CCN) -
România
Acción Océanos, Spain
Alconchel sin Minas, Extremadura, Spain
Amigos de la Tierra, Spain
Asociación Alarma Terra de Montes, Galicia, Spain
Asociación Cultural Valle el Saltador, Andalucía, Spain
Asociación de Defensa Ambiental Salvemos Cabana, Galicia, Spain
Asociación Tralapena, Galicia, Spain
Campaña Sur sin Megaminas, Extremadura, Spain

Ecologistas en Acción, Spain
Fundação Montescola, Galicia, Spain
No a la mina de Gilico, Murcia, Spain
No a la mina en la Sierra de Yemas, Castilla y León, Spain
Plataforma Bierzo Aire Limpio, Castilla y León, Spain
Plataforma Cívica Alcalaboza Viva, Andalucía, Spain
Plataforma Comarca de Olivenza sin Minas, Extremadura, Spain
Plataforma en Defensa da Ría de Muros e Noia - PLADEMAR, Spain
Plataforma Mina Touro - O Pino Non, Galicia, Spain
Plataforma de afectados por la minería de Teruel, Aragón, Spain
Plataforma de Afectados por Metales Pesados de la Sierra Minera, Murcia, Spain
Plataforma de afectados por las explotaciones mineras de Peña Zafra, Balonga y Quibas, Murcia, Spain
Plataforma No a la Mina de Cañaverl, Extremadura, Spain
Plataforma No a la Mina en el Valle del Corneja, Castilla y León, Spain
Plataforma Oro No, Principado de Asturias, Spain
Plataforma para la defensa del Valle de Lucainena, Andalucía, Spain
Plataforma Rural Sostenible, Castilla y León, Spain
Plataforma Salvemos Esparteros, Andalucía, Spain
Plataforma Salvemos la Montaña de Cáceres, Extremadura, Spain
Plataforma Salvemos las Villuercas, Cáceres, Spain
Plataforma Sí a la Tierra Viva, Castilla-La Mancha, Spain
Sierra de Gata Viva, Cáceres, Spain
Sindicato Labrego Galego, Galicia, Spain
SOS Suído-Seixo, Galicia, Spain
Marš sa Drine, Serbia
Udruženje za zaštitu životne sredine (AEP), Serbia
Mlavaska vojska, Petrovac na Mlavi, Serbia
Čuvari Homolja, Žagubica, Serbia
Pokret Odbranimo šume Fruške gore, Fruška Gora, Serbia
Udruženje za zaštitu šuma, Novi Sad, Serbia
Ne dam, Ne dau, Majdanpek, Serbia
Borani se pitaju, Bor, Serbia
Extinction rebellion Srbija, Serbia
Kreni-Promeni, Serbia
PRVI PRVI NA SKALI, Kragujevac, Serbia
Earth Thrive Serbia/UK
Polekol, Serbia
Bravo! Novi Sad, Serbia
Kremnica nad zlato, Kremnica beyond gold, Slovakia
Urán Košice STOP, Slovakia
Skiftet, Sweden
Kazdagi Association for The Protection of Natural and Cultural Assets, Türkiye
Climate Justice Coalition, Türkiye
Kazma Birak Campaign Coordination Committee, Türkiye
En Ecocide, Türkiye
Ukrainian Nature Conservation Group, Ukraine
Free Svydovets, Ukraine
The Corner House, United Kingdom
Fuel Poverty Action, United Kingdom

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Dr. Carlos Tornel, Independent Scholar, México
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Ciarán Ó Briain, Independent Scholar / PhD Candidate, Ireland
Cristiano Pereira, PhD Candidate, ISCTE-IUL, Portugal
Elena Gálvez, PhD Candidate, University of Coimbra, Portugal
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İlksen Dincer Bas, End Ecocide Türkiye, Türkiye
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MSc Chemical Engineering, Leif Ramm-Schmidt, Finland
Niina Helistö, Surveyor, former mine supervisor, founder of Rajat Lapin kaivoksille ry, Finland
Pedro Fidalgo, PhD Candidate, Centre for Social Studies University of Coimbra, Portugal
Ramón Balcázar Morales, PhD Candidate in Rural Development, UAM Mexico
Rodolfo Pezzi, PhD candidate, Trinity College Dublin, Ireland
Ruta Śpiewak, Assistant Professor, Polish Academy of Sciences, Warsaw, Poland
Tiago Patatas, PhD Candidate in Architecture Research, Royal College of Art, United Kingdom
Vera Ferreira, PhD Candidate, University of Lisbon, Portugal

ENDNOTES

ⁱ Information supplied by DG GROW 09-11-2023. Already in a 2020 complaint statement on the Horizon 2020 project MIREU, the signatory "Não às Minas Montalegre" from Portugal had informed Commission's DG GROW on the questionable business practices of Lusorecursos. With the recent corruption scandal in Portugal, the company was, including their facilitators Iberian Sustainable Mining Cluster (ISMC) and Cluster Portugal Mineral Resources (ACPMR), excluded

from the Horizon Europe funding application “Li4Life”. Despite the Portuguese Public Prosecutors search warrant equally targeting the directors of the mining authority DGEG on the grounds of “illegitimate benefits” for the involved companies, the Commission upholds its participation in the RMW.

ⁱⁱ Examples include the 2018 Borba tragedy in Portugal, with 5 casualties, the arrest of public officials in connection to the Orivesi mine owned by Dragon Mining in Finland, or the ongoing prosecution of 16 mining officials in connection with the reopening of the Aznalcóllar mine in Spain. In Spain alone, the *Iberian Mining Observatory* (www.minob.org) has documented more than 30 cases of corruption and administrative misconduct connected to mines while the European Commission itself is facing an ongoing investigation by the European Ombudsman on the use of Horizon funds in the illegal operation of the San Finx mine.

ⁱⁱⁱ EEB <https://eeb.org/critical-raw-materials-regulation-vote/>

^{iv} Contrary to Norway, Germany, Spain, Luxembourg, Netherlands, and Denmark, no host member state has so far ratified the Indigenous and Tribal Peoples Convention (ILO 169). As part of the letter’s signatories the Sámi stress: the loss of lands impact reindeer herding, local economy, Sámi culture, health, and well-being. Sámi traditions and culture will vanish if reindeer herding disappears. The European project steered by the Commission must recognize and protect the rights of the indigenous Sámi people to their lands that they have traditionally owned, occupied, and used, including those to which they have had access for their subsistence and traditional activities.

^v European Commission’s *3rd EU Raw Materials Scoreboard*

^{vi} AGEMERA, BIORECOVER, CROCODILE, ENICON, EXCEED, GREENPEG, illuMINEation, INFAC, ION4RAW, ISAAC, MADITRACE, MIREU, NEMO, NEXT, PACIFIC, RAWMINA, RIA CICERO, S34I, SecREEs, SEMACRET, SOLCRIMET, SUMEX, TARANTULA, VAMOS, VECTOR; references at <https://docs.google.com/spreadsheets/d/1BKz2hMNSg1gwApu5D27u0Inv0mbE-yhWGMpPhG3eyVc/edit?usp=sharing>

^{vii} Of the 25 research consortia in question, 15 have, backed by the Commission’s managing agencies ERC-EA, EASME, and HaDEA, refused to make their Grant Agreements, and parts on how they intend to shape the public’s perception, available to interested civil society actors, invoking “commercial secrets” and “intellectual property” that allegedly outweigh the public’s interest (AGEMERA, BIORECOVER, EXCEED, GREENPEG, illuMINEation, MIREU, NEMO, NEXT, RAWMINA, SecREEs SEMACRET, SOLCRIMET, SUMEX, TARANTULA, VECTOR). // EASME Head of Raw Materials Sector Marcin Sadowski at the “Social Acceptance in the Raw Material Sector” workshop 2018: “projects funded under Horizon 2020 are expected to address [...] impacting public awareness and acceptance and trust in mining operation.” // HaDEA project advisor Véronique Woulé Ebongué at Raw Materials Week 2019: “actions responding to 2018-2020 calls are requested to [...] improve public awareness, acceptance and trust’.”

^{viii} For the Horizon Europe project VECTOR allegations including negligence of, are: local ethics evaluation, research, and good participatory practice with feedback given in the project’s host countries (Germany, Serbia, Ireland), as recommended by the mitigation requirements of the *Global Code of Conduct for Research in Resource-Poor Settings* (see §1, §2, §3, §4, §8, §9, §10). At least in Serbia, §21 was violated through a VECTOR member not disclosing the intent and scope of contacts made with local communities. The use of machine learning to identify favorable areas for extractive activities in Europe and the non-involvement of human rights experts and independent advisors may be in violation of the *Guidance note on Potential misuse of research*, as VECTOR’s activities involve minority and vulnerable groups and it develops social and behavioral profiling technologies that could be misused to stigmatize, discriminate against, harass or intimidate people. Last but not least, all 4 members of the VECTOR’s ethics management and advisory board are not free from conflict of interest in informing an interdisciplinary raw materials project on public acceptance and mining conflicts: At least two advisors have or still serve as corporate defenders in various high-profile fraud, bribery and corruption cases, e.g. for Eurasian Natural Resources Corporation (Kazakhstan, Africa), Rio Tinto (Simandou mine, Guinea), Alstom (Tunisia), and Atalaya Mining Plc (Spain). On one advisor’s own report and, apart from a work history with the VECTOR partner and mining consultancy Satarla Ltd, he was, in the early 2000s, “buying dynamite from a corner shop [in Potosi, Bolivia] to hand it as a present to artisanal silver miners”. 3rd advisor “offers to assist companies earn and retain [...] approval from the communities” through his own advisory firm, having published on “Earning the Social License” for the Dingleton resettlement project (co-authorship with a Anglo American employee), a socio-environmental conflict around the South African Sishen opencast mine, owned by Kumba Iron Ore. The 4th member, long-term servant of the French military forces, including during the French counter-insurgency operations Serval and Barkhane in Mali, publishes on conflict mitigation and resolution operations, including how the armed conflict outcomes and use of technology in modern warfare can “be employed in other missions ... such as pacification operations”, e.g. French Yellow Vests Protests. Sources available, please contact mineria@ecologistasenaccion.org.

^{ix} <https://euobserver.com/green-economy/157619>

^x These programs include INFAC, NEMO, RAWMINA, INTMET and BioMOre, many of which carry a “social license” component.

^{xi} https://www.europarl.europa.eu/doceo/document/TA-9-2021-0468_EN.html

^{xii} For example, the Touro copper proposal in Spain plans an 81-meter-high dam just 200 meters upstream from the village of Arinteiro. While Brazil and Ecuador prohibit tailing dams less than 10 km upstream from potentially affected communities and China prohibits them at a distance of less than 1 km, EU legislation imposes no restrictions.

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- ^{xiii} <https://www.europarl.europa.eu/cmsdata/243324/Hearing%202002.12.2021%20testimony%20Emerman.pdf>
- ^{xiv} The signatories consider mining waste, the extractive waste directive and related BAT norms as insufficient. Pressure due to fast-tracked permitting, and the reversal of evidence in favor of corporate misconduct in European regulations, including the CRMA, is worsening socioecological conditions in Europe and beyond.
- ^{xv} Certej 1971; Aznalcóllar, 1998; Baia Mare and Baia Borşa, 2000; Aitik, 2000; Sasa, 2003; Malvési, 2004; Ajka, 2010; Talvivaara, 2012; Kostajnik, 2014; Kittilä/Suurikuusikko, 2015; Cobre Las Cruces, 2019; Kevitsa, 2023.
- ^{xvi} Pitron, G.; Pérez, J.-L. (2019). *Le vert n'est pas vert!* [film]. Paris: Arte France.
- ^{xvii} European Academies' Science Advisory Council (EASAC), 2023. statement "Deep-Sea Mining: assessing evidence on future needs and environmental impacts". <https://easac.eu/publications/details/deep-sea-mining-assessing-evidence-on-future-needs-and-environmental-impacts>
- ^{xviii} "Today, depending on the metal concerned, about three times as much material needs to be moved for the same ore extraction as a century ago, with concomitant increases in land disruption, groundwater implications and energy use". International Resource Panel (2011). *Decoupling natural resource use and environmental impacts from economic growth*. Nairobi: UNEP. At: <https://www.ourenergypolicy.org/wp-content/uploads/2014/07/decoupling.pdf>
- ^{xix} In Romania, the proposed Rovina mine has 0.16% copper and it would be the second largest in Europe.
- ^{xx} Bolger, Meadhbh, Diego Marin, Adrien Tofighi-Niaki, and Louelle Seelmann. "'Green Mining' Is a Myth: The Case for Cutting EU Resource Consumption." Brussels, European Environmental Bureau Friends of the Earth Europe, 2021, p.14. <https://friendsoftheearth.eu/wp-content/uploads/2021/09/Methodology-considerations-Annex-to-green-mining-is-a-myth.pdf>.
- ^{xxi} Dunlap, Alexander. "The Green Economy as Counterinsurgency, or the Ontological Foundations for Permanent Ecological Catastrophe." *Environmental Policy and Science*, 2023, 39–50.
- ^{xxii} Michaux, Simon P. "The Mining of Minerals and the Limits to Growth." *Geological Survey of Finland: Espoo, Finland*, 2021, 1–72.; partially exposed by Simon Michaux to DG GROW on November 18th 2022
- ^{xxiii} Dunlap, Alexander. "Spreading 'Green' Infrastructural Harm: Mapping Conflicts and Socioecological Disruptions within the European Union's Transnational Energy Grid." *Globalizations* 20, no. 6 (2023): 907–31, <https://doi.org/10.1080/14747731.2021.1996518>.
- ^{xxiv} Objection submitted to the Commission's DG GROW on 22nd November 2022 by MiningWatch Portugal
- ^{xxv} [10 years of EU's failed biofuels policy has wiped out forests the size of the Netherlands - study - Transport & Environment \(transportenvironment.org\)](https://www.transportenvironment.org/discover/10-years-of-eus-failed-biofuels-policy-has-wiped-out-forests-the-size-of-the-netherlands-study/) <https://www.transportenvironment.org/discover/10-years-of-eus-failed-biofuels-policy-has-wiped-out-forests-the-size-of-the-netherlands-study/>