

To:

*Mr. Stéphane Séjourné, Executive Vice-President for Prosperity and Industrial Strategy
Ms. Jessika Roswall, Commissioner for Environment, Water Resilience and a Circular Economy
Mr. Jozef Sikela, Commissioner for International Partnerships*

Cc:

*Ms. Teresa Ribera, Executive Vice-President for Clean, Just and Competitive Transition
Mr. Michael McGrath, Commissioner for Democracy, Justice, the Rule of Law
Ms. Ilze Juhansone, Secretary General*

Subject: CRMA Strategic Projects and Democratic Oversight

5th of March 2025, Brussels

Dear Commissioners,

We are writing to express our profound concern regarding the Strategic Projects under the Critical Raw Materials Act (CRMA), and particularly the proposals for new mining projects. The core values of the EU, on democracy and human rights, as well as the [EU Principles for Sustainable Raw Materials](#) must be reflected in the selection of Strategic Projects.

Unfortunately, we fear that this is not the case, leading to [significant risks](#) for communities and the environment, which would also not be in line with the [UN Principles on Critical Transition Minerals](#). Furthermore, mining projects taking place in vulnerable nature areas, risk **undermining the EU's own environmental legislation** such as the Water Framework Directive, and Birds and Habitats Directive.

We regret the **lack of transparency** during the selection process of Strategic Projects. Since the start, the process has been opaque without any involvement of civil society¹. Despite repeated requests², neither the list of project applicants nor the assessment results have been made available. As of yet, it is still unclear how the submitted proposals were evaluated and which criteria were used to select the Strategic Projects.

Across the world, communities near proposed mining sites see their lives being turned upside down, while surrounding nature areas are being degraded. To illustrate this, we have published a set of [factsheets](#) to shed light on the adverse impacts by extractivism. Meanwhile, affected communities and Indigenous Peoples are excluded from the decision-making process. Denying them, and civil society,

¹ Only recently could stakeholders apply to join the CRMA Working Group on Public Knowledge. However, discussions have been very limited so far, not leaving any space for meaningful engagement.

² *Friends of the Earth Europe* has submitted requests for access to documents on mining projects in [Indonesia](#) and [Brasil](#).

the right to information and access to decision-making, **violates the EU's obligations under the Aarhus Convention** and the UN Declaration on the Rights of Indigenous Peoples.

Fast-tracking³ contested mining projects may lead to **reputational risks** for the EU, since anti-mining protests within and outside of Europe will continue as long as the energy transition is neither just nor sustainable. Especially if deals are made with authoritarian regimes that are violently repressing societal opposition, which is the case in [Serbia](#), the trust in the EU may be eroded.

While the CRMA proposes responsible sourcing, the Strategic Projects are pushed forward **without robust due diligence and accountability mechanisms**, against the backdrop of attempts to weaken the Corporate Sustainability Due Diligence Directive. As a result, there are few safeguards to avoid mineral supply chains that are compromised by human rights abuses, Indigenous Peoples' rights violations, corruption and environmental harm. This is particularly problematic in regions with weaker governance and inadequate rule of law. A tragic example is the recent outbreak of violence in Eastern Congo, incited by the M23 rebels with the backing of Rwanda. Given the EU-Rwanda partnership, the EU risks importing minerals from this conflict-affected area, thus sustaining illegal mineral exploitation by a government that is actively destabilizing a neighboring country. [Civil society organisations](#) and the [European Parliament](#) are now urging the European Commission to suspend the EU-Rwanda partnership. The EU has a moral and legal obligation to ensure that its policies do not inadvertently support aggression, occupation or illegal exploitation.

Rather than reinforcing the EU's reliance on primary extraction, the CRM Board should select Strategic Projects that **reduce CRM dependency through demand moderation**. To achieve a just transition, the EU should not only increase investments in recycling and material efficiency, but also promote resource use reduction through systemic measures. The new Circular Economy Act is an opportunity to **adopt a demand mitigation target and develop sufficiency strategies** that contribute to future-proof and resilient European industries.

If the EU aims to achieve a truly just and green transition, it must open up the decision-making process to include civil society and seriously consider evidence about malpractices, social and environmental infringements. Most importantly, Strategic Projects that violate human rights and Indigenous Peoples' rights, or deteriorate valuable ecosystems, must not be granted Strategic Project status.

To discuss these matters, and improve the functioning of the Raw Materials Board, we would like to request a meeting at your earliest convenience. In addition, we look forward to receiving the assessment reports of the current list of Strategic Projects.

On behalf of the Raw Materials Coalition,

Yours sincerely,

Matilda Flemming

Director Friends of the Earth Europe

³ It has to be noted that fast-tracking permitting processes does not guarantee access to sustainable raw materials. In fact, [regulatory processes are not the main obstacle to mining projects](#), as is often claimed by companies. Rather, it is the economic underperformance of companies and other economic factors that delay mining projects.