

# Driving destructive mining

## **EU Civil Society denounces EU raw materials plans in European Green Deal**

In 2019, the European Commission published its European Green Deal, an action plan outlining climate and environmental policies and initiatives to be taken forward in the coming years. Despite laudable intentions, these plans have at their heart the damaging and illogical idea of 'green growth'<sup>1</sup> and assume 'business-as-usual' consumption of energy and materials in the EU. In particular, as they stand, Europe's Green Deal plans will lead to a dramatic increase in demand for mineral and metals that the European Commission intends to meet through a large number of new mining projects - both inside and outside the EU.

This planned reliance on mining to deliver the Green Deal is a cause of major concern for civil society around the world. Mining companies are responsible for an enormous human and ecological toll on every continent. The sector is responsible for extensive human rights violations<sup>2</sup>, conflicts with and within affected communities<sup>3</sup>, and the exploitation of labour and exacerbation of socio-economic inequalities. It is also a significant contributor to climate change, global biodiversity loss and water stress<sup>4</sup>. Increasing material demand and the EU's plans to meet it through new mining projects will escalate all of these problems.

Mining-affected communities in Europe and their allies in civil society oppose the continuous expansion of the mining industry and challenge the dominant narrative of unlimited growth and policies which uphold it. This statement outlines a civil society analysis of the EU's current plans and suggests how the EU can address the systemic issues underpinning endless extractivism and turn the tide toward a more just and sustainable future.

These recommendations include the critical need for the EU and Member States to realise in law communities' right to free, prior and informed consent, including the Right to Say No, as well as to put urgent measures in place to achieve absolute reductions in demand for – and consumption of – raw materials in Europe.



# Overconsumption rising metal and mineral demand

Under business-as-usual (i.e. the growth-based economic system) overall global material demand, including for energy<sup>5</sup>, is projected to more than double by 2060<sup>6</sup>. The EU already consumes more than its fair global share of these resources<sup>7</sup>, causing disproportionate impacts on people, especially those in exporting countries, and our shared planet. Moreover, the supposed benefits of this overconsumption are both unevenly distributed and of questionable value. Study after study shows that material wealth does not lead to a corresponding increases in happiness, well-being or health<sup>8</sup>.

Metals and metallic minerals are used along with other materials in everyday products and services in all sectors – from laptops and phones, to houses and cars, to wind turbines and lights, to military and aerospace technologies. In the past several decades, global metals extraction<sup>9</sup> has more than tripled and is set to continue to rise, according to the International Resource Panel<sup>10</sup>.

Growing demand is partly due to a 'green transition'. This is particularly true for minerals and metals like lithium, which are required for renewables and electrification infrastructure, including electric car batteries<sup>11</sup>. But the EU and Member States are using the fact that some minerals and metals are used for renewable energy technologies to greenwash the metal mining industry in general. They are conflating the demand for more mining with action on climate change and social progress.

In reality, however, renewable energy technologies account for only a fraction of projected increases in mineral and metal demand<sup>12</sup>. It is general (over)consumption in all sectors, driven by the push for a constantly growing economy, increasing urbanisation and digitalisation, that are the main drivers of metal and mineral demand<sup>13</sup>. The research driving EU metals and minerals plans and policies assumes our overall consumption will continue to grow<sup>14</sup>.



# Land and water use conflicts in the making

Throughout Europe, communities on the frontlines of mining projects assert that the EU and Member States are not meeting the standards of existing environmental regulations which have been put in place to protect nature and EU citizens' right to a healthy environment. Of particular concern are the actual and alleged violation of EU laws concerning water and biodiversity, amongst others<sup>15 16 17</sup>.

Communities are also increasingly concerned about the ways in which mining is threatening 'new frontiers' for mineral and metal extraction, such as the deep sea, sites set aside for conservation and rural areas that play a vital role in genuinely sustainable community livelihoods. Modern mining operations have an enormous spatial footprint, causing conflicts with biodiversity protection, and other land uses. As ore grades of many minerals and metals decline, this is set to grow<sup>18 19</sup>.

Habitat loss from current projected mining related to metals and minerals is a major issue. A global study looking at spatial overlaps between mining areas and biodiversity conservation sites shows that mining areas (82% of which are for metals and minerals demanded by renewable energy infrastructure) have an overlap of 8% with Protected Areas, 7% with Key Biodiversity Areas, and 16% with Remaining Wilderness<sup>20</sup>.

Even before the extensive expansion of mining in Europe, the EU and Member States are failing to protect Natura 2000 and Ramsar sites, which have been set aside with the intention of conserving nature<sup>21</sup>. In fact, despite the EU's Nature Directives, 81% of habitats and 63% of the species that these laws were designed to protect still have an 'unfavourable' conservation status according to the European Environment Agency<sup>22</sup>.

Mining in European rural areas will also threaten other land uses and sustainable activities such as small-scale farming and fishing, and eco-tourism<sup>23</sup>. The low-impact livelihoods of many rural communities within the EU are part of the solution to the ecological and climatic crises we are living through and should be preserved and promoted.



# Coercion : engineering 'social acceptance' of mining

The EU and Member States are pursuing the industry-coined concept 'Social License to Operate (SLO)' to smooth the way for mining with as little community input and dissent as possible. The EU is using taxpayers' money to fund projects, such as the Mining and Metallurgy Regions of the EU project (MIREU), that are formulating and promoting the notion of Social License to Operate<sup>24</sup>.

The SLO concept has been widely criticised by civil society in Europe as being tokenistic, non-binding and lacking a clear and transparent process. Apart from SLO's utility in socially engineering consent for extraction<sup>25</sup>, it is unclear why such a weak new concept is needed when stronger, more democratically-developed instruments like Free, Prior and Informed Consent, including the Right to Say No, already exist.

SLO represents a continuation of dismissive, uninformed attitudes about community resistance to unwanted or controversial mining projects. Today, when community feedback or objections do not comply with prevailing pro-mining agendas, citizen contestation is frequently labelled and dismissed as originating from a not-in-my-backyard ('NIMBY') attitude. As well as being untrue in many cases, this discourse reinforces an already unacceptable power asymmetry between mining companies and local people. It also creates pro-industrial bias in what should be neutral and objective consultation processes.

Unless SLO is abandoned and stronger, fairer consultation mechanisms are adopted, the EU risks incentivising mining conflicts, undermining citizen's rights to demand information, and equitable consultation processes under the Aarhus convention, as well as violating their right to refuse projects without prejudice.



# Corruption, lack of transparency and violations of human rights

In the Global South it is common for frontline communities to report that local processes are lacking in good governance; that there has been little or no transparent sharing of data from public institutions and from mining companies; that companies are failing to declare their interests to citizens at research, development and prospecting stages of the mining process. According to community testimonies, investigations<sup>26</sup> and submissions to both the Aarhus Convention and the European Parliament's Petitions Committee, many of these abuses are being replicated in Europe.

Industry standards remain largely voluntary and reliant on corporate self-regulation. While the introduction of a mandatory EU human rights and environmental due diligence law will be a welcome step, it is not enough to transform a sector that is repeatedly ranked as the deadliest in the world for those who oppose it, and for workers' safety<sup>27</sup>.

The signs are not promising for a European mining boom. The often repeated mantra that mining practices within Europe will be better than outside of Europe cannot be based simply on a belief in European superiority. It must rely on fully enforced laws, strong regulations and an empowered citizenry.



# Public subsidies and industry partnerships

Mining companies and their shareholders are benefiting from EU public subsidies being channeled into research projects of dubious public benefit<sup>28</sup> and industry-led EU alliances<sup>29</sup> that undermine civil society's role in decision-making processes.

In some jurisdictions, financial speculation in the sector is rife, as evidenced by recent research from Spain<sup>30</sup>. EU money is being channeled into mining and mining-related projects<sup>31</sup>, often without oversight of the environmental impacts of projects or verification of environmental permits to conduct activities. This state of affairs has been denounced in several prominent cases<sup>32</sup>.

In another example of conflict between mining and the EU's own non-extractive policy commitments, mining is attracting public money - allocated via European Regional Development, Interreg and NextGenerationEU funds - away from genuine rural development, public goods and climate mitigation efforts.

Despite pumping public funds into mining and mining-related projects, the European Commission's raw materials initiatives are largely inaccessible to citizens. Instead they are dominated by industry-led alliances and stakeholder groups. The recently established European Raw Materials Alliance provides an illuminating case study. Meetings to discuss the establishment and aims of this group were only held with industry, effectively excluding other voices<sup>33</sup>.

Giving industry the reins - or at least a privileged say - in its own regulation threatens true public interest decision-making and produces outcomes that are weak, voluntary, and/or twisted towards the financial interests of the businesses invited to sit at the table.



# Global impacts trade, waste and security

Europe's appetite for metals, now and in the future, will not be satisfied from within its borders. At present almost 40% of metal ores are imported<sup>34</sup> and for several metals the reliance is 100%<sup>35</sup>.

Despite justifying increased domestic extraction within the EU by claiming this will reduce extraction in less-regulated nations in the Global South, the EU's raw materials strategy has a strong focus on securing mineral and metal supply from 'third countries'. It aims to achieve this securitisation through aggressive trade liberalisation, as evidenced by the raw materials chapters on EU trade agreements and so-called 'raw materials diplomacy'<sup>36</sup>. This is a cause for serious concern<sup>40</sup>.

The EU's demand for minerals and metals from overseas leads to social conflict, killings of environmental and human rights defenders, environmental destruction and carbon emissions around the planet. Current EU trade policy is solely aimed at liberalising the raw materials sector with little regard to human rights, the environment and the sovereignty of countries in the Global South, trapping these nations in a cycle of extractivism and dependency<sup>373839</sup>. Nor does EU policy take into account the unequal ecological exchange between – and historical plunder of – the Global South by European nations, amounting to a staggering theft of wealth from past, present and future generations<sup>40</sup>.

By focusing its attention on securing supply from new mining projects in and beyond Europe's borders, the EU shows a lack of political concern for the third pillar of its own raw materials strategy - which focuses on circularity - and the millions of tons of e-waste generated, discarded in Europe or shipped away annually to the Global South for harmful recycling and later repurchase<sup>41</sup>. There is also illegal dumping of e-waste between Member States<sup>42</sup>.

The immense amount of e-waste generated in Europe, has recoverable gold, silver, platinum, palladium and copper, amongst other metals and minerals entering waste streams. Yet only 18 metals have recycling rates higher than 50% and for many critical minerals, like lithium and rare earth elements, recycling rates are less than 10%<sup>4344</sup>.



Increased recycling is not a 'silver bullet' solution and absolute consumption reduction is a priority, but it is clear that greater recycling through, for example urban mining, must be prioritised more than they are at present.

## Toxic legacies mining waste

As ore grades continue to decline, the volume of mining waste generated for each unit of mineral produced will continue to increase. Opening new mines across Europe will only exacerbate the issues caused by mining waste, with more tailings generated and stored in larger, often more unsafe dams<sup>46</sup>.

Relying on industry to tackle the problems around mine tailings management and dam failures has not worked. According to many scientists and experts, the Global Tailings Review, aimed at establishing an international standard for mine waste management, does not go far enough<sup>47</sup>, and does not begin to adequately address water quality issues when communities living near mining are frequently affected by water contamination.

Europe, despite its self-styled reputation as a well-regulated jurisdiction, has suffered numerous serious tailings dam and mining waste incidents in recent years, including Talvivaara (Finland), Rio Tinto (Spain), Aznacollar (Spain), and Baia Mare (Romania/Hungary). In fact, as recently as 2007 Europe held the dubious honour of being the global region with the second-highest number of tailings dam incidents<sup>48</sup>.

Far from being a world leader, the EU's current mining waste legislation is lacking in several respects. For example, EU Member States do not have a shared database accounting for mine tailings and tailings content concentrations. This hinders the implementation of circular economy solutions to clean up and revalorise the tailings. This means that, typically, once mining operations end, waste and tailings dams usually become a liability for Member States and citizens. Often former mine sites must be cared for in perpetuity to manage the threat of long-term impacts, including critical dam failures and acid mine drainage<sup>49</sup>.



The EU's mining waste problem is also frequently externalised. EU and international waste legislation requires waste to be reduced at the source and hazardous waste to be disposed of in the state where it was generated. These basic waste management rules are systematically disregarded by mining companies that sell or transport metal concentrates and slugs. Metal concentrates and metal slugs are normally toxic and, instead of being treated according to the waste requirements in the country of origin, are exported and dumped elsewhere, usually – but not always – in countries with weak environmental legislation<sup>5051</sup> or in the sea<sup>52</sup>.



# Recommendations and alternatives

The only way to address the issues outlined above in a truly systemic way is to dramatically reduce the EU's material and energy consumption and guarantee citizens' rights. Any pursuance of 'green growth', tinkering around the edges or reformist approaches simply won't work. Policies built around the false narratives of 'sustainable and responsible', and 'more but better' mining are attempts at greenwashing which will do nothing to fix the problems.

The European Commission recently said that "Resource reduction efforts are rather a long term focus, in the short and medium term policies must be put in place to allow for a circular economy, resilience and climate neutrality.<sup>53</sup>" This is not a path that will lead us toward true environmental and social justice. Decarbonisation and dematerialisation are intrinsically linked and actions to reduce consumption, be more circular and decarbonise must all happen in parallel.

Indeed, the European Environment Agency is now promoting this message. They say that we "require fundamental transformations to a different type of economy and society instead of incremental efficiency gains within established production and consumption systems" and that "real creativity is called for: how can society develop and grow in quality (e.g. purpose, solidarity, empathy), rather than in quantity (e.g. material standards of living), in a more equitable way?"<sup>54</sup>.

The demands towards EU decision-makers listed here are intended as a contribution to this "real creativity".



# 1

## **Legally recognise Indigenous Peoples' right to Free Prior and Informed Consent (FPIC) and the rights of local communities, peasants and other people working in rural areas to active and free participation in decisions that affect their lives, including a Right to Say No to mining in the EU and along EU supply chains.**

The rights to information and effective participation of communities and Peoples are enshrined in international human rights law as well as other international agreements (e.g. ICCPR, Article 25, and UNDROP, Article 10). International law and UN Treaties also particularly recognise Indigenous Peoples' right to Free Prior and Informed Consent (FPIC) (e.g. ILO Convention No. 169, Article 6 (1), CBD, Article 15, UNDRIP, Article 19.)

These instruments provide guidance on the design and implementation of meaningful mechanisms, processes and protocols that enable Indigenous Peoples, local communities, peasants and other peoples to effectively participate in decisions that may affect their lives, taking into account existing power imbalances and, in the case of Indigenous Peoples, the right to either give or withhold consent for projects affecting them.

Recognising Indigenous Peoples right to FPIC and developing new, legally binding protocols for the effective participation of potentially affected non-indigenous communities and Peoples which specifically recognises and protect their Right to Say No to mining projects in the EU and throughout EU supply chains represents one important way to address the current imbalance of power between mining companies, Member States and communities.

# 2

## **Reduce EU resource consumption in line with planetary boundaries and fair share consumption.**

To consume within ecological limits, best available research says the EU must aim to reduce its material footprint<sup>55</sup> by up to 70% (to approx. 4.4 tonnes per capita) from current levels<sup>56</sup>. Within this overall legally-binding goal, sub-material and sub-sectoral targets must be set, and detailed plans are required to show how the targets will be achieved. Indicators and targets on land and water footprints must also be fully developed to give a comprehensive picture of total resource use. In practice, reducing absolute resource use means implementing socially and ecologically just degrowth strategies in Europe<sup>57</sup>. For example, policies reducing reliance on car travel and the number of cars on the road, while making high quality public transport accessible to all and promoting active commuting (cycling and walking).



Reducing overall material footprint by weight is a good way of ensuring environmental damage from mining is dramatically reduced<sup>58</sup>. However, the EU should also investigate setting plans to reduce the EU consumption footprint, which looks at impacts of consumption (including ecotoxicity, climate change, eutrophication) using Life Cycle Analysis tools<sup>59</sup>.

Decoupling should be abandoned as a goal. Globally, economic growth has not been decoupled from resource consumption and environmental pressures and is not likely to become so<sup>60,61</sup>.

## **3 Enforce and strengthen EU environmental and human rights regulations.**

EU Directives concerning water, biodiversity and others should be enforced to their full extent in actively regulating existing mining operations within the EU. Local communities and NGOs are to be considered as crucial allies in support of the Commission's role as 'guardian of the treaties' by helping enforce the EU's environmental laws on the ground.

In addition to enforcing existing directives, Natura 2000 and Ramsar sites, other state-designated and supranational conservation areas (e.g. UNESCO world heritage sites), Indigenous and community conservation areas (ICCAs), as well as the deep seas and the Arctic, should be strictly protected as No Go Areas for extractive industries.

The EU must undertake spatial assessments to assess and address overlapping risks from mining in terms of risk to biodiversity, groundwater and freshwater reserves. In doing so it should demonstrate it has mapped the extent to which potential overlaps could threaten habitats and biodiversity, agricultural production, food security, drinking water supplies and overall regional security. These assessments must be publicly available.

The EU must also develop meaningful and enforceable mechanisms to ensure the spatially explicit consequences (not just threats) of mining on biodiversity are assessed by host governments prior to licencing, including those that occur in marine ecosystems, and at varying distances from mine sites.



In addition, the EU Conflict Minerals Regulation must be extended to include downstream companies using the conflict minerals, and all raw materials. Currently only the sourcing of tin, tantalum, tungsten and gold is regulated, and for imports in relatively unprocessed form rather than also in final products. Sanctions and penalties must be imposed on companies found to be violating due diligence rules.

## **4 End exploitation of so-called third countries.**

In addition to the measures already mentioned, further actions must be taken to ensure EU demand for raw materials does not impact communities and ecosystems in the Global South and that remedy is available when impacts and violations do occur.

The mandatory EU human rights and environmental due diligence law must impose liability on companies for harms committed at home or abroad and guarantee access to justice for victims of corporate abuse, with enhanced cooperation to prosecute European companies, executives and suppliers responsible for human rights violations, crimes and environmental destruction abroad<sup>62</sup>.

The EU should participate in good faith in negotiations to establish a UN Treaty on Business and Human Rights.

Trade agreements must be designed with a view to improve human rights - in particular guaranteeing the rights of communities to FPIC and the Right to Say No - and take into account the social and environmental consequences of trade. Investor State Dispute Settlement (ISDS) mechanisms must be removed from existing EU trade deals and abandoned in future deals.



# 5

## **Prioritise and strengthen ‘circular economy’ policies.**

Despite circular economy practices like redesign, reuse and recycling alone having limited potential for turning the tide on the predicted massive increases in metal and mineral demand under business-as-usual, it is vital these measures are put in place as part of overall consumption and demand reduction policies.

Urgent measures include strict mandatory product design rules on minimum lifetime requirements, durability and repairability; phase-out of single-use products when reusable alternatives exist; prohibition of destruction of unsold or returned goods; enabling sharing of services and infrastructure; minimum secondary metal content targets in products; removing proprietary barriers to reuse, repair and refurbishing; innovation and investment in urban mining. Such requirements must be applied and adapted to all sectors, including the military and aerospace sectors, which are often exempt from EU laws but are responsible for massive environmental and social impacts<sup>63</sup>. In addition, the monitoring of the international transport of e-waste needs to improve, and illegal dumping between Member States and to the Global South eradicated.

While policies should clearly focus on drastically reducing Europe’s private vehicle fleet, the proposed EU Batteries Regulation<sup>64</sup> must be strengthened by requiring stringent eco-design standards to ensure good performance and durability as well as recycled content, non-destructive removability, disassembly, reparability, interoperability and reusability, i.e., enabling the possibility of reuse after first life of every electric vehicle battery; mandating a deposit return system for all portable batteries in order to increase collection targets for batteries, and introducing a ban or mandatory levies for single-use batteries<sup>65</sup>.



# 6

## Remedy mining waste liabilities.

The threats of new mining projects are exacerbated by the large number of abandoned mining projects in Europe that have not been properly restored and continue to contaminate and harm communities and their environment. These old mining sites must therefore be cleaned up.

Specific 'low maximum' amounts need to be set up for the concentrations of sulphur and heavy metals permitted in the waste facilities in order to, on the one hand, promote the recovery of valuable metals from the extractive waste towards the circular economy, and on the other hand to avoid future acid mine drainage and pollution by heavy metals. Companies must apply the best available technologies to their fresh tailings being generated today so that they are persuaded to clean up their tailings before the operations close.

The European Commission needs to implement an European standardised mechanism and shared database to account for mining and metallurgical waste facilities and to register the content concentrations in a publicly shared database. This would make citizens aware of the nature of hazards, and research institutions can have the real data to develop better recovery technologies to clean up and remove the existing tailings. Other forms of waste disposal such as submarine and deep-sea mine tailing placements are practices that the EU should not allow.

In this, light, the European Commission must urgently implement the European Parliament's demands from its resolution on the implementation of the Mining Waste Directive<sup>66</sup>, which contains many of the recommendations above.



## **7 End subsidies for mineral and metal mining exploration and extraction**

In order to curb the dangers of subsidy gouging and financial extractivism in the European mining sector the EU should immediately cease giving public subsidies to mining exploitation and exploration companies through programmes such as Horizon Europe, NextGenerationEU, Interreg, European Regional Development Fund and others. Instead, public funding efforts should prioritise supporting sustainable rural livelihoods, advanced recycling, urban mining, mine rehabilitation, soil remediation and other circular uses of mining waste and minerals.

## **8 End undemocratic industrial alliances.**

Alliances that give undue power and influence to businesses with a financial stake in the continued expansion of mining can have no place in a democratic, transparent EU. They should be disbanded.

## **9 Treat minerals and metals as common, public goods.**

Rather than treating, regulating and creating policy about minerals and metals as if they were simply sources of capital to be extracted, commodified and sold, EU policies and regulations should treat them as common, public goods which are of greatest value left in situ, in the ecosystems they help constitute in and beyond Europe.



# ORGANISATIONS

## EUROPE

vetoNu, Sweden  
Friends of the Earth Europe, Belgium  
Fundação Montescola, Galiza, Spain  
ZERO - Associação Sistema Terrestre Sustentável, Portugal  
Rettet den Regenwald, Germany  
European Environmental Bureau (EEB), Europe  
Asociación ambiental Petón do Lobo, Galicia, Spain  
Ecologistas en Acción, Spain  
Sciaena, Portugal  
Both ENDS, the Netherlands  
Amigos de la Tierra (FoE Spain), Spain  
Asociación galega Cova Crea, Galicia, Spain  
NOAH Friends of the Earth Denmark, Denmark  
War on Want, UK  
SOS Suido, Galiza, Spain  
BUND, Friends of the Earth Germany  
Plataforma Veciñal Mina Touro O Pino Non, Galiza, Spain  
CATAPA, Belgium  
Deutsche Stiftung Meeresschutz, Germany  
Collectif Volontaires Intag, France  
Sociedade Histórica e Cultural Coluna Sanfins, Galiza, Spain  
Plademar Muros-Noia, Galiza, Spain  
Ecologistas en Acción Galiza, Galiza, Spain  
Rettet den Regenwald, Germany  
Salva la Selva, Spain  
Campaña Sur Sin Megaminas, Spain  
The Andrew Lees Trust, UK  
The Gaia Foundation, UK  
Associação Guardiões da Serra da Estrela, Portugal  
Plataforma Stop Uranio, Spain  
Christian Initiative Romero (CIR), Germany  
The Greens Movement of Georgia, Georgia  
World Economy, Ecology & Development - WEED e.V., Germany  
urgewald e.V., Germany  
Ecologistas en Acción de Extremadura, Spain  
Reuse Lab "Mach Mehrweg", Germany  
Earth Thrive, Serbia / UK  
GLOBAL 2000, Austria  
Uranium Network, Germany  
Igapo Project, France  
Plataforma Ciudadana Zaragoza sin Fractura, Spain  
Asociación de Cultura Popular Alborada -Gallur, Spain  
Hellenic Mining Watch, Greece  
ECCR, United Kingdom  
Corporate Justice Coalition UK, UK  
Estonian Green Movement, Estonia  
SETEM Catalunya, Spain  
Collectif Causse Méjean - Gaz de Schiste NON !, France  
ADAMVM, Association pour la Dépollution des Aciennes Mines de la Vieille Montagne, France  
La raya sin minas, Spain  
Asociación Plataforma Ciudadana Alconchel sin Minas, Spain  
Philippinenbüro e.V., Germany  
PowerShift e.V., Germany  
No a la mina de Cañaverl, Spain  
Enginyeria sense Fronteres, Spain  
Plataforma Salvemos la Montaña de Cáceres, Spain  
Natexplorers, France  
Sierra de Gata Viva, Spain  
Associação Povo e Natureza do Barroso, Portugal  
Sindicato Labrego Gallego, Spain  
Gruvkampen Dalsland, Sweden  
Policies for Equitable Access to Health - PEAH, Italy  
INKOTA-netzwerk e.V., Germany  
CAIM- Communities against the injustice of mining, Ireland (North and South)

Friends of the Earth Northern Ireland, Northern Ireland  
Environmental Justice Project, Spain  
London Mining Network, UK  
Aitec, France  
Naturakademin, Sweden  
Friends Of The Earth Sweden, Sweden  
The Gathering, Ireland  
Vi som brinner för Unden, Sweden  
Style Records, Ireland  
Armenian Forests, Armenia  
Association SystExt, France  
France Nature Environnement, France  
Commission Justice et Paix, Belgium  
Water Justice and Gender, Netherlands  
Leapfrog2SD, Belgium  
FutureProof Clare, Ireland  
Kampagne Bergwerk Peru, Germany  
Urbergsgruppen Grenna-Norra Kärr, Sweden  
Forum on Environment and Development, Germany  
Save Our Sperrins, Northern Ireland  
Asociación de Cultura Popular Aborada -Gallur, Spain  
DKA Austria, Austria  
Amis de la Terre France / Friends of the Earth France  
Stoppa alunskifferbrytning i Storsjöbygden, Sweden  
Save Inishowen from Gold Mining, Republic of Ireland  
Miljögruppen Pite Älvdal, Sweden  
RÄDDA STORSJÖN - Gruvdrift Ett Hot, Sweden  
Stop Rönnbäck Nickel Mining Project in Ume River, Tärnaby (Stoppa gruvan i Rönnbäck, Sápmi/Sweden)  
Intag e. V., Germany  
Seas At Risk, Belgium/Portugal  
Asociación Ecoloxista Verdegaia, Galiza, Spain  
Südwind, Austria  
Broederlijk Delen, Belgium  
RepaNet - Re-Use- and Repair Network Austria, Austria  
Quercus ANCN, Portugal  
Ghent Centre for Global Studies, Belgium  
CEE Bankwatch Network, Czech Republic  
11.11.11 - Coalition of International Solidarity, Belgium  
Biofuelwatch, UK/USA  
GegenStroemung – INFOE e. V., Germany  
Ingénieurs sans frontières, France  
Zaštito Jadar i Rađevinu / Protect Jadar and Radjevina, Serbia  
Koalicija za održivo rudarstvo u Srbiji / Coalition for sustainable mining in Serbia, Serbia  
Bond Beter Leefmilieu, Belgium

## INTERNATIONAL

Strong Roots Congo, DR Congo  
Innovation et Formation pour le Développement et la Paix, DR Congo  
Alerte Congolaise pour l'environnement et les droits de l'homme, ACEDH, D R Congo  
Save Virunga, D R Congo  
Africa Europe Faith & Justice Network, Africa/Europe  
Talents des femmes Autochtones et Rurales en RDC, DR Congo  
MiningWatch Canada, Canada  
Cooperation Canada, Canada  
Procesos Integrales para la Autogestion de los Pueblos, Mexico  
WoMin African Alliance, Pan-African  
Projet Accompagnement Québec-Guatemala, Canada  
Save Our Sky Blue Waters, USA  
Save Lake Superior Association, Minnesota, USA



Movimento pela Soberania Popular na Mineração-MAM, Brasil  
 Kalpavriksh, India  
 TerraJusta, Bolivia/UK  
 St. Mary's River Association, Canada  
 Coletivo Decolonial, Brazil  
 Instituto Anãnaí, Brazil - Amazon (MA)  
 Red Latinoamericana de mujeres defensoras de derechos sociales y ambientales, Abya Yala/Altin America  
 Policy Forum Guyana, Guyana  
 Observatorio Plurinacional de Salares Andinos, Chile  
 Red Mexicana de Afectadas/os por la Minería (REMA), México  
 Sustainable Northern Nova Scotia, Canada  
 Ontario for a Just Accountable Mineral Strategy, Canada  
 Malach Consulting, USA/Utah  
 Anthropocene Alliance, United States  
 Indigenous Peoples Global Forum for Sustainable Development, IPGFforSD (International Indigenous Platform), Global  
 Association pour l'Integration et le Developpement Durable au Burundi, AIDB (Indigenous Forum in special consultative status with the UN ECOSOC), Burundi  
 Calgary Indo-Canadian Centre Association, Canada  
 Regroupement Vigilance Mines Abitibi et du Témiscamingue, Canada, Abitibi/Témiscamingue  
 Local Environmental Action Demanded, USA  
 Hellenic Mining Watch, Greece  
 Wolsatog Grand Council, Canada  
 The Future We Need, India  
 Australian Conservation Foundation (ACF), Australia  
 Association pour la protection du lac Taureau - APLT, Canada  
 The Friends of the Stikine Society, Canada  
 Kamloops Moms For Clean Air, Canada  
 Gender Action, United States  
 LEAD Agency, Inc, USA  
 People's Health Movement Canada - Mouvement populaire pour la santé au Canada, Canada  
 CRAAD-OI (Research and Support Center for Development Alternatives - Indian Ocean), Madagascar  
 ACAFREMIN - Alianza Centroamericana frente a la Minería, Central America  
 Femmes en Action Rurale de Madagascar (FARM), Madagascar region AFRIQUE  
 Fundación Pachamama, Ecuador  
 Kené, Instituto de Estudios Forestales y Ambientales, Perú  
 Movimento Xingu Vivo para Sempre, Brasil  
 Wumweri Ghodu CBO, Kenya  
 Center for Indigenous Research & Community-Led Engagement (CIRCLE), University of Victoria, Canada  
 Friends of the Siberian Forests, Russia  
 Observatorio Ciudadano, Chile  
 Community land Action Now (CLAN), Kenya- Africa  
 Sengwer Indigenous Peoples Programme, Kenya  
 Sengwer Of Embobut CBO(SEECCBO), Kenya  
 FIAN International, International  
 CooperAcción, Perú  
 Acción por la Biodiversidad, Argentina  
 Global Forest Coalition, Russia  
 Otros Mundos AC/Chiapas, México  
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# References

<sup>1</sup>Based on the idea that we can continue to grow our economies and eventually decouple GDP growth from energy and material use, meaning GDP will continue to rise and consumption fall. In reality, this is being shown more and more to be an impossible aim, even acknowledged by the European Environment Agency <https://www.eea.europa.eu/downloads/-/beed0c89209641548564b046abcaf43e/1610379758/growth-without-economic-growth.pdf>

<sup>2</sup><https://www.globalwitness.org/en/campaigns/environmental-activists/>

<sup>3</sup>Environmental Justice Atlas. <https://ejatlas.org/>

<sup>4</sup><https://www.resourcepanel.org/reports/global-resources-outlook>

<sup>5</sup>Material demand is made up of biomass, fossil fuels, metals and non-metallic minerals

<sup>6</sup><https://www.resourcepanel.org/reports/global-resources-outlook>

<sup>7</sup>Ibid.

<sup>8</sup><https://iopscience.iop.org/article/10.1088/1748-9326/ab7461/pdf>

<sup>9</sup>This does not include waste rock extracted - only metal ores.

<sup>10</sup><https://www.resourcepanel.org/reports/global-resources-outlook>

<sup>11</sup><https://ec.europa.eu/docsroom/documents/42881>

<sup>12</sup><https://www.earthworks.org/media-releases/report-clean-energy-must-not-rely-on-dirty-mining/>

<sup>13</sup>For example, noted in: <https://londonminingnetwork.org/wp-content/uploads/2019/09/Post-Extractivist-Transition-report-2MB.pdf> and <https://www.resourcepanel.org/reports/global-resources-outlook>

<https://waronwant.org/resources/a-material-transition>

<sup>14</sup><https://ec.europa.eu/docsroom/documents/42881>

<sup>15</sup><https://www.irishnews.com/news/northernire-landnews/2019/11/06/news/departments-decides-not-to-defend-legal-action-over-water-discharge-consent-at-gold-mine-site-in-co-tyrone-1757404/>

<sup>16</sup><https://spark.adobe.com/page/EEhhVoVvXdpjZ/>

<sup>17</sup>[http://www.mwen.info/docs/10.1007\\_s10230-005-0081-3.pdf](http://www.mwen.info/docs/10.1007_s10230-005-0081-3.pdf)

<sup>18</sup>[https://www.researchgate.net/publication/283321865\\_The\\_Risk\\_Public\\_Liability\\_Economics\\_of\\_Tailings\\_Facility\\_Failures](https://www.researchgate.net/publication/283321865_The_Risk_Public_Liability_Economics_of_Tailings_Facility_Failures)

<sup>19</sup><https://s3.ap-southeast-2.amazonaws.com/dpe-files-production/s3fs-public/dpp/149728/prioretal2010resourcedepletion.pdf>

<sup>20</sup><https://www.nature.com/articles/s41467-020-17928-5>

<sup>21</sup>As it currently stands, Natura 2000 sites are not intended to be 'no development zones' and new extractive developments are not automatically excluded. See: <https://ec.europa.eu/environment/nature/info/pubs/docs/leaflets/nee/en.pdf>

<sup>22</sup><https://www.eea.europa.eu/highlights/latest-evaluation-shows-europes-nature>

<sup>23</sup><https://www.sciencedirect.com/science/article/pii/S0016718520302050>

<sup>24</sup>[https://www.miningwatch.pt/assets/pdf/Joint%20statement%20H2020%20MIREU%20en\\_GB%20blackened.pdf](https://www.miningwatch.pt/assets/pdf/Joint%20statement%20H2020%20MIREU%20en_GB%20blackened.pdf)

<sup>25</sup><https://www.sum.uio.no/english/research/publications/2021/alexander-dunlap-the-evolving-techniques.html>

<sup>26</sup><https://nominaspeninsulaiberica.eu/declaracion/>

<sup>27</sup><https://www.globalwitness.org/en/press-releases/global-witness-records-the-highest-number-of-land-and-environmental-activists-murdered-in-one-year-with-the-link-to-accelerating-climate-change-of-increasing-concern/>

<sup>28</sup><http://www.envjustice.org/2020/09/mireu-backfires/>

<sup>29</sup>For example: <https://erma.eu/>

<sup>30</sup><https://www.ecologistasenaccion.org/wp-content/uploads/2019/12/Report-Speculative-Mining-in-Spain.pdf>

<sup>31</sup>[https://ec.europa.eu/commission/presscorner/detail/en/ip\\_19\\_6705](https://ec.europa.eu/commission/presscorner/detail/en/ip_19_6705)

<sup>32</sup>Examples of EU funding to mining projects that have not undergone environmental impact assessment include the San Finx tungsten mine in Spain (Horizon 2020 and EIT Raw Materials funding), the Cáceres lithium project in Spain (EIT InnoEnergy funding), and the Hautalampi nickel-cobalt project in Finland (ERDF and Interreg funds).



# References

- <sup>33</sup> <https://friendsoftheearth.eu/wp-content/uploads/2021/05/The-EUs-Industrial-Alliances.pdf>
- <sup>34</sup> EU Raw Materials Scoreboard, 2020 (forthcoming)
- <sup>35</sup> <https://ec.europa.eu/docsroom/documents/42882>
- <sup>36</sup> [https://ec.europa.eu/growth/sectors/raw-materials/specific-interest/international-aspects\\_en](https://ec.europa.eu/growth/sectors/raw-materials/specific-interest/international-aspects_en)
- <sup>37</sup> <https://power-shift.de/alternatives-for-the-energy-and-raw-materials-chapters-in-eu-trade-agreements/>
- <sup>38</sup> <https://www.politico.eu/article/europes-hunger-for-lithium-sparks-tensions-with-chile/>
- <sup>39</sup> [https://ec.europa.eu/commission/presscorner/detail/en/IP\\_21\\_105](https://ec.europa.eu/commission/presscorner/detail/en/IP_21_105)
- <sup>40</sup> <https://core.ac.uk/download/pdf/207057603.pdf>
- <sup>41</sup> [http://wiki.ban.org/images/f/f4/Holes\\_in\\_the\\_Circular\\_Economy-\\_WEEE\\_Leakage\\_from\\_Europe.pdf](http://wiki.ban.org/images/f/f4/Holes_in_the_Circular_Economy-_WEEE_Leakage_from_Europe.pdf)
- <sup>42</sup> <https://sverigesradio.se/artikel/7557095>
- <sup>43</sup> [https://www.foeeurope.org/sites/default/files/news/foee\\_report\\_-\\_less\\_is\\_more.pdf](https://www.foeeurope.org/sites/default/files/news/foee_report_-_less_is_more.pdf)
- <sup>44</sup> <https://www.resourcepanel.org/reports/metal-recycling>
- <sup>45</sup> <http://journals.pan.pl/dlibra/publication/121561/edition/105936/>
- <sup>46</sup> <https://www.balcanicaucaso.org/eng/Areas/Bulgaria/From-Brazil-to-Bulgaria-the-giants-we-ignore-at-our-peril-207932>
- <sup>47</sup> <https://www.earthworks.org/publications/safety-first-guidelines-for-responsible-mine-tailings-management/>
- <sup>48</sup> <http://dx.doi.org/10.1016/j.jhazmat.2007.07.050>
- <sup>49</sup> Such as those from the Aznalcóllar (1998), Baia Mare and Borşa (2000), Aitik (2000), Sasa (2003), Malvési (2004), Ajka (2010), Talvivaara (2012), Monte Neme (2014) and Cobre Las Cruces (2019)
- <sup>50</sup> <https://www.sciencedirect.com/science/article/pii/S0025326X15003422>
- <sup>51</sup> <https://bankwatch.org/blog/exporting-toxic-pollution-from-europe-to-namibia>
- <sup>52</sup> <https://news.mongabay.com/2018/06/citigroup-limits-financing-for-mines-that-dump-tailings-at-sea/>
- <sup>53</sup> [https://friendsoftheearth.eu/wp-content/uploads/2021/04/Response-to-open-letter\\_Breton\\_Spanish.pdf](https://friendsoftheearth.eu/wp-content/uploads/2021/04/Response-to-open-letter_Breton_Spanish.pdf)
- <sup>54</sup> <https://www.eea.europa.eu/downloads/-/beed0c89209641548564b046abcaf43e/1610379758/growth-without-economic-growth.pdf>
- <sup>55</sup> [https://ec.europa.eu/eurostat/statistics-explained/index.php/Material\\_flow\\_accounts\\_statistics\\_-\\_material\\_footprints](https://ec.europa.eu/eurostat/statistics-explained/index.php/Material_flow_accounts_statistics_-_material_footprints) Note, for metals and metallic minerals, this only includes total weight metal ores in final consumption, not waste rock.
- <sup>56</sup> Research varies, with most robust figures from: German Environment Agency [https://www.umweltbundesamt.de/rescue/-summary\\_report](https://www.umweltbundesamt.de/rescue/-summary_report); Stefan Brigezu, Wuppertal Institute <https://www.mdpi.com/2079-9276/4/1/25>; UNDP [http://hdr.undp.org/sites/default/files/hdr\\_2020\\_overview\\_english.pdf](http://hdr.undp.org/sites/default/files/hdr_2020_overview_english.pdf). The European Commission must, as a priority, develop these targets.
- <sup>57</sup> Kallis, G., Paulson, S., D'Alisa, G., & Demaria, F. (2020). The case for degrowth. John Wiley & Sons.
- <sup>58</sup> <https://pubs.acs.org/doi/10.1021/acs.est.7b00698>
- <sup>59</sup> [https://publications.jrc.ec.europa.eu/repository/bitstream/JRC115570/science\\_for\\_policy\\_brief\\_rev2\\_-\\_online.pdf](https://publications.jrc.ec.europa.eu/repository/bitstream/JRC115570/science_for_policy_brief_rev2_-_online.pdf)
- <sup>60</sup> <https://www.eea.europa.eu/downloads/-/beed0c89209641548564b046abcaf43e/1610379758/growth-without-economic-growth.pdf>
- <sup>61</sup> <https://eeb.org/library/decoupling-debunked/>
- <sup>62</sup> [https://friendsoftheearth.eu/wp-content/uploads/2020/10/FoEE\\_Human\\_Rights\\_report\\_v15-pages-1.pdf](https://friendsoftheearth.eu/wp-content/uploads/2020/10/FoEE_Human_Rights_report_v15-pages-1.pdf)
- <sup>63</sup> <https://londonminingnetwork.org/2020/11/martial-mining-report-out-now/>; <https://www.guengl.eu/events/under-the-radar-the-carbon-footprint-of-europes-military-sectors/>
- <sup>64</sup> [https://ec.europa.eu/commission/presscorner/detail/en/ip\\_20\\_2312](https://ec.europa.eu/commission/presscorner/detail/en/ip_20_2312)
- <sup>65</sup> <https://eeb.org/library/enhancing-the-sustainability-of-batteries-ngo-position-paper/>
- <sup>66</sup> [https://www.europarl.europa.eu/doceo/document/TA-8-2017-0199\\_EN.html](https://www.europarl.europa.eu/doceo/document/TA-8-2017-0199_EN.html)