

Input from Worldwide Fund for Nature (WWF)

Firstly, the CRMA needs to not just focus on reacting to changes in the supply side but also actively influence the demand side. To prioritise demand reduction, sufficiency and circularity over primary resource extraction. The CRMA can signal politically that the Commission must act on setting this overall materials demand reduction target in its next mandate.

Within Pillar 1, objectives for increasing capacity at different value chain stages must: 1) have a global justice dimension; 2) be underpinned by a commitment to, and enforcement of, high environmental and social legislation and standards and mandatory human rights and environmental due diligence; 3) favour secondary over primary raw materials.

Within Pillar 2, the mapping and monitoring of strategic mineral resources' demand developments is key as well as broader national material flows. The EU needs to actively play a role in influencing demand (beyond mapping). The dedicated operational network mentioned by the Commission should also look into how this can be done, and include civil society.

Within Pillar 3, any list of strategic projects that are developed must ensure that:

1) the process and selection are done in a transparent and democratic manner involving all EU institutions and stakeholders; 2) criteria for choosing projects are based on a robust assessment of environmental and social risks, assessment of any company involved and its past performance, adherence to IRMA standard, community consent; 3) there are "no-go" zones; 4) a certain percentage of the strategic projects are secondary raw materials projects; 5) any "streamlined and quicker permitting procedures" are focused on strengthening and improving administrative capacity, not by-passing environmental standards or safeguards; 6) projects ensure reference to the EU CS3D.

Within Pillar 4, to strengthen resource use, waste and circularity frameworks the CRMA must:

1) signal politically that the Commission must act in its next mandate to develop an EU-wide material footprint reduction target; 2) ensure circularity measures apply to all products containing CRMs including imports; 3) update the EU Extractive Waste Directive to strengthen exploration and documentation of CRMs in secondary deposits and waste streams, including that Member States create an open database reporting data on extractive waste facilities; 4) set binding targets for waste operators of CRMs from different waste streams for material recovery and final recycling levels; 5) set product design requirements, including on product longevity and recycled content; 6) increase support for EU research and innovation funding on recycling, substitution and material recovery technologies for CRMs.

Also in Pillar 4, to ensure high environmental, social and governance standards the CRMA must:

1) establish "no-go" zones for exploration and extractive activities e.g. protected areas, Natura2000 sites, the arctic, the deep sea; 2) establish and enforce ambitious environmental, social and human rights legislation and standards, including Water Directive, EIA Directive, Habitats Directive, updating Extractive Waste Directive, and referencing the CS3D; 3) scale up investment and action on low-impact mining, underground mining, bio-mining, geothermal; 4) require suppliers report on carbon emissions, water and material footprint and land use per tonne of material.

Lastly in Pillar 4, strategic reserve measures should: 1) include global justice dimension – securing reserves in Europe must not reinforce path dependencies of resource-rich countries and must keep open adequate participation and democratic leeway for their own economic policy; 2) favour secondary over primary raw materials; 3) comply with the highest possible ecological, human rights and labour standards; 4) be used exclusively for sustainable products and infrastructure. The entire process should be governed by democratic decision-making.