



EU Raw Materials Coalition

# RESOURCEEU:

SECURITY WITHOUT SAFEGUARDS IS NO  
SECURITY AT ALL

MAY 2026



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The EU Raw Materials Coalition is a civil society alliance of over 60 organisations working to ensure Europe's raw materials policies are socially just, environmentally responsible and grounded in reduced resource consumption. The coalition advocates for stronger safeguards, community rights and a fair transition, while challenging extractivist approaches that put people, nature and ecosystems at risk.

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**Layout:** Andreas Budiman Widihandojo

**Contact:** [robin.roels@eurmc.org](mailto:robin.roels@eurmc.org)

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This paper sets out the EU Raw Materials Coalition's assessment of the [RESourceEU Action Plan](#) and provides forward-looking recommendations on upcoming legislative and policy initiatives, including the European Critical Raw Materials Centre, permitting frameworks, and international partnerships.

### Key Recommendations:

- Maintain environmental integrity, human rights and democratic governance as core pillars of EU raw materials policy, rejecting any weakening of the Water Framework Directive and reaffirming the non-deterioration principle in European environmental law.
- Establish clear, binding and transparent governance, transparency and prioritisation principles for critical raw materials in the European Critical Raw Materials Centre, with parliamentary oversight, public reporting and prioritisation aligned with climate, societal and public interest goals.
- Ensure permitting acceleration is limited to administrative efficiency, while fully safeguarding environmental assessments, public participation, access to justice and community consent.
- Embed mandatory human rights and environmental due diligence, traceability and transparency in EU-supported international projects, joint purchasing, stockpiling and supply chain governance.
- Introduce binding mineral demand reduction targets, supported by circularity, efficiency and reduction measures, to reduce dependency, supply-risk shocks, align with planetary boundaries and to strengthen long-term resilience.
- Close the funding gap through scrutinised EU financing instruments and greater coordination across existing funds, and make all public support strictly conditional on full transparency of beneficiaries, binding ESG criteria, compliance with EU environmental law, mandatory human rights and environmental due diligence.

## SUMMARY

[RESourceEU](#) reflects the EU's attempt to accelerate the development of raw materials projects, with a stronger focus on security of supply and more centralised coordination. The plan introduces several intervention tools, including joint purchasing, strategic stockpiling, demand aggregation and a European Critical Raw Materials Centre with prioritisation authority. However, the criteria governing these mechanisms remain unclear. So far, no binding rules clarify how materials will be distributed in times of scarcity between defence manufacturing, renewable energy deployment, grid infrastructure or other public interest uses. **Without transparent governance rules, including parliamentary oversight, centralisation may result in discretionary concentration of power and opaque decision-making.**

As the initiative moves forward, its **primary objective should remain to support the green transition**. Securing responsible supply for critical raw materials (CRM) must be accompanied by strong environmental and social safeguards to ensure that projects meet the highest standards and deliver benefits for communities and ecosystems on the ground.

At the same time, RESourceEU aims to create political momentum for permitting acceleration and regulatory "simplification" including proposed revisions to the Water Framework Directive (WFD).

In a context where water scarcity, pollution and biodiversity loss remain acute, it cannot be justified to further weaken environmental legislation, speeding up permitting procedures or weakening the EU environmental legislation and will lead to faster project delivery.

Last, the initiative briefly recognises the importance of circularity and recycling, but does not yet address the need to **reduce overall mineral demand**, including through material footprint targets. Without effective and targeted measures to lower material consumption, efforts to diversify supply risk reinforce long-term dependencies.

Europe's strategic autonomy can only be credible if it rests on ecological resilience, protection of human rights and strong democratic accountability. Without these foundations, RESourceEU risks entrenching uncontrolled competition over resources instead of creating long-term strategic autonomy for Europe.

# 1. THE NEED FOR ENVIRONMENTAL SECURITY

Europe faces critical challenges in its raw materials sector: vulnerable supply chains and overdependence on key imports. At the same time, biodiversity loss and the climate crisis threaten the systems that underpin society and economic stability. Environmental breakdown is itself a security risk: the [UK's national security assessment](#), informed by MI6, warns that ecosystem collapse and resource scarcity can trigger food and water insecurity, migration pressures and geopolitical instability, with disproportionate impacts on vulnerable populations and communities dependent on natural resources.

RESourceEU is framed through a narrow lens of “economic security” and “defence readiness”. When raw materials are framed primarily as strategic inputs for defence and competitiveness, environmental and social safeguards such as environmental impact assessments, nature conservation laws and water legislation risk being treated as procedural obstacles rather than foundational aspects of security and resilience and at the same time overlooking social impacts, including on workers and affected communities.

In this regard, the proposal to review and revise the WFD in connection with raw materials access is one of the most consequential elements of RESourceEU. The Directive is the backbone of EU freshwater protection, anchored in the non-deterioration principle and the objective of achieving good ecological and chemical status for all water bodies. Yet today, only [39.5 per cent of surface waters in the EU are in good ecological status](#). In that context, framing water governance as a “bottleneck” to mineral access risks shifting the logic of EU environmental law from protection to facilitation of extractive industries. **Any reference to “synergies” between raw materials policy and water law must be defined, and the binding nature of ecological objectives must be explicitly reaffirmed, including the protection of water resources essential to communities and ecosystems.**

Mining and mineral processing are water-intensive and due to the use of hazardous chemicals (or substances of concern) often lead to contamination of water bodies.

Tailings failures, acid mine drainage, heavy metal contamination, and groundwater depletion are structural risks, not isolated incidents.

Across Europe and globally, contaminated waterways near extraction sites require long-term remediation, often paid for by public funds when operators fail or withdraw.

Weakening interpretation guidance around environmental quality standards, background concentrations, or compliance assessments could lower protection levels; Such “simplification” would undermine the WFD ecological objectives while increasing long-term environmental and financial liabilities for Member States.

Weakening the WFD would also create a dangerous precedent: that environmental protection can be recalibrated in response to industrial pressure. If Article 4 exemptions are watered down, the EU's broader environmental acquis becomes politically negotiable. For the EU Raw Materials Coalition, this is a red line. Strategic autonomy cannot be built on degraded water systems. Freshwater resilience underpins agriculture, public health, biodiversity, and climate adaptation. Any hypothetical short-term mineral gain will generate long-term ecological and economic costs that far exceed their strategic value - costs that will ultimately be borne by citizens and taxpayers and at the expense of future generations.

We are concerned that the narrow security narrative risks compressing democratic space as emergency logics, stockpiling mechanisms and defence-linked prioritisation create incentives for reduced transparency and shortened consultation timelines. This runs counter to the Aarhus convention which guarantees access to environmental information, public participation in environmental decision-making and access to justice. Projects that proceed without meaningful public participation face higher litigation risks, local resistance and reputational damage which then lead to project delays rather than faster delivery.

For these reasons, acceleration measures should only focus on administrative coordination and capacity building (see more in section 6), including addressing resource constraints such as staffing levels and working capacity in administrative authorities, not substantive standards. Public participation, access to justice, scientific independence and the non-deterioration principle in environmental law, alongside social safeguards and respect for the rights of affected communities, must remain intact. A timely notification and appropriateness of the timing during the participation process are crucial for it to be meaningful. **Long-term security cannot be built on weakened environmental governance**. Degrading ecological systems will ultimately undermine, rather than strengthen, Europe's security.

## 2. THE FUNDING GAP

Recently, the European Court of Auditors (ECA) found that EU measures have not delivered sufficient progress in securing domestic supply, and that projects continue to face financial, legal and administrative barriers. This reflects a structural imbalance in how funding is prioritised. While significant attention is given to mobilising finance for projects, far less focus is placed on strengthening the public authorities and regulatory systems that are essential for effective, timely and legally robust permitting. Under-resourced permitting authorities, combined with limited technical capacity, remain a key bottleneck across Member States.

Addressing this gap requires targeted investment in administrative capacity, including staffing, expertise and coordination across competent authorities for doing rigid environmental impact assessment and acquiring consent for projects to go through. In parallel, greater support is needed to ensure the consistent application and development of Best Available Techniques under EU environmental legislation, which are **critical to minimising environmental impacts and providing clarity and predictability for both regulators and project developers**. Crucially, any expansion of public funding should prioritise these systemic enablers.

Public finance must reinforce high environmental standards and robust decision-making processes, rather than bypass them. This includes ensuring transparency, accountability and public oversight, so that funding contributes to both supply security and the effective protection of environmental and social interests.

### 3. INTERNATIONAL PARTNERSHIPS AND THE RISK OF EXTERNALISED EXTRACTION

RESourceEU emphasises the development of a pipeline of projects outside the EU and frames international partnerships as mutually beneficial arrangements designed to secure EU offtake. We have, however, concerns about the elevated risk of outsourcing environmental and social pressures to other countries. Worryingly, while the RESourceEU Communication refers to “local value addition” and socioeconomic benefits, it does not establish binding criteria or enforcement mechanisms to guarantee these outcomes.

In practice, extractive projects often generate limited local processing, volatile employment and long term ecological degradation. Without binding corporate human rights and environmental due diligence, free and fair negotiations, including requirements for Free, Prior and Informed Consent (FPIC), in line with international human rights law including UN Declaration on the Rights of Indigenous Peoples and the ILO Convention 169, benefit and ownership sharing frameworks with affected communities, and effective grievance mechanisms, partnerships risk deepening historical power imbalances rather than being mutually beneficial arrangements.

This is especially sensitive in contexts where governance capacity is uneven and where mining related conflicts are already widespread. Globally, mineral extraction is responsible for over 80 percent of biodiversity loss and water stress associated with resource use, and social conflicts linked to mining projects continue to rise. These risks are particularly acute where projects affect the rights and lands of Indigenous Peoples. Business and Human Rights Centre (BHRC) has recorded more than 800 allegations of human rights abuses perpetrated by mining companies outside the EU, with some leading to serious litigation action and reputational damages. Of the 13 EU-selected strategic projects outside the EU's borders, eight will operate in countries associated with weak regulatory frameworks and heightened corruption and governance risks – namely Serbia, Zambia, Madagascar, Brazil, Malawi, Kazakhstan, South Africa and Ukraine – countries that score below 50% on Worldwide Governance Indicators. At least four projects will operate in poor and water-stressed regions, where new extraction may worsen conditions without proper safeguards.

The EU should advocate for and support its partner countries in filling these regulatory and governance gaps while also requiring project promoters to **implement robust risk management policies**.

These must be available to the public and concerned rights-holders to build effective accountability. **Building public trust through meaningful engagement, robust human rights due diligence and transparency** should not be seen as an obstacle, or as a mere compliance. It should instead be seen as critical and as a prerequisite to securing sustainable, legitimate, and resilient supply chains.

Similarly, the EU's aim for mineral security must go hand in hand with partner countries' own industrial development. This should include supporting local employment and education, fostering processing and value addition further down the mineral value chain, strengthening broader industrial capabilities and sharing technology and patents. Such an approach is also in the EU's interest, as it will remain reliant on processed minerals from third countries. In short, **international cooperation must be grounded in genuine support for local economic diversification**.

## 4. TRANSPARENT GOVERNANCE AND PRIORITISATION PRINCIPLES IN THE EUROPEAN CRITICAL RAW MATERIALS CENTRE

RESsourceEU establishes a European Critical Raw Materials Centre with the authority to facilitate stockpiling, coordinate joint purchasing and prioritise purchases for strategic sectors. This represents a significant concentration of allocation power at EU level. For the first time, the Union will not only regulate raw materials markets but actively steer mineral flows.

The upcoming legislative proposal on the European Critical Raw Materials Centre, expected in Q2, will be a key moment to shape how this governance structure operates in practice. This proposal should therefore clearly define the Centre's mandate, governance structure and operational safeguards, including strong democratic oversight, transparency requirements and public accountability mechanisms. It should also ensure that the Centre is equipped with sufficient financial capacity to invest in projects that meet high environmental, social and governance standards, rather than relying primarily on market coordination tools.

The governance of this centre needs to be defined with sectoral hierarchy rules, allocation criteria or transparency obligations towards the parliament and the public for how materials will be prioritised during shortages. Critical raw materials such as lithium, rare earth elements and graphite are simultaneously required for renewable energy systems, grid modernisation, digital infrastructure and defence applications. In conditions of scarcity, allocation decisions determine whether renewable deployment might accelerate or slow down. The Communication explicitly mentions prioritising aerospace and defence sectors, but it does not clarify whether renewable energy systems will receive equal or higher priority during supply disruptions, or how broader public interest objectives, including climate goals and societal needs will be reflected in allocation decisions. This must be seen as a major shortcoming in its design.

Concentrated purchasing power also raises market governance concerns. Joint procurement and demand aggregation can stabilise markets, but they can also distort them if not transparently managed. Decisions about which suppliers are selected, which projects receive guaranteed offtake, and which Member States benefit from stockpile release must be subject to **democratic oversight, clear allocation criteria and public transparency**. Without reporting obligations on stockpile composition, release decisions and sectoral distribution, there is a risk of discretionary decision-making insulated from scrutiny. The defence sector operates under different transparency standards than civilian industrial policy.

Procurement contracts, supply chains and allocation decisions are often shielded by confidentiality provisions justified on national security grounds. Embedding critical raw materials allocation into defence financing frameworks therefore introduces a significant governance asymmetry. It risks creating a parallel allocation logic where materials are secured through opaque channels with limited parliamentary scrutiny and reduced public accountability. This is particularly problematic given that public funding instruments are increasingly used to de-risk extraction and processing projects.

**Centralised procurement requires centralised accountability.** Without transparent governance, the concentration of allocation power risks weakening democratic legitimacy at precisely the moment when the EU is asking citizens to trust new security-driven industrial instruments.

## 5. JOINT PURCHASING MUST EMBED MANDATORY DUE DILIGENCE

By aggregating demand and enabling collective purchasing, the EU is no longer merely regulating markets but actively shaping them. When public authorities aggregate purchasing power, they create powerful signals that can rapidly expand extraction and processing activities upstream. Without strict sourcing conditions, the EU risks using public leverage to accelerate supply chains that may be linked to land dispossession, labour exploitation, violation of Indigenous Peoples' rights, water contamination, and biodiversity destruction.

Therefore, **joint purchasing and stockpiling must include binding due diligence conditions, including full traceability, human rights and Indigenous Peoples' rights checks, biodiversity checks, as well as public reporting of origins and risks**. If stockpiles are filled before full traceability and risk assessment are secured, the EU may entrench harmful supply relationships that are difficult, if not impossible, to unwind. This governance gap is particularly concerning in a political context where corporate accountability frameworks are under pressure. Due diligence legislation has already been diluted through most notably the Corporate Sustainability Due Diligence Directive revision and the first environmental omnibus, and enforcement capacity remains uneven across Member States.

When individual companies procure materials, accountability mechanisms target corporate actors. When public institutions coordinate procurement at scale, the responsibility becomes collective and political. The reputational, legal and economic implications of sourcing failures increase accordingly, including project delays, increased costs and supply disruptions. Failing to embed mandatory due diligence into joint purchasing mechanisms would therefore expose the EU to both rights-based challenges and credibility risks in its external partnerships. If RESourceEU is framed as strengthening European resilience, that resilience must include supply chains that are demonstrably free from severe environmental harm and human rights violations. Transparency and traceability are not only ethical requirements but core resilience tools, enabling the identification of vulnerabilities, reducing exposure to legal and reputational risks, and strengthening long-term supply stability.

## 6. PERMITTING ACCELERATION CANNOT BECOME DEREGULATION

RESourceEU announces environmental permitting acceleration as part of its strategy to ensure rapid deployment of strategic projects. Environmental protection cannot be traded for fast-tracking mining in an already deteriorated environment. Mining and processing projects frequently involve significant impacts on groundwater, surface water, air quality, biodiversity, and local livelihoods. Speeding up approval processes without reinforcing environmental safeguards risks compounding existing degradation rather than strengthening resilience, and may place additional pressure on already burdened communities facing constrained timelines for engagement and decision-making. If Environmental Impact Assessments become procedural hurdles to clear quickly rather than substantive tools for risk evaluation, the long-term consequences can include water contamination, tailings failures, and irreversible ecosystem loss.

In this regard, the recent proposal to accelerate environmental assessments introduces procedural compression and special rules for “strategic” sectors, including Strategic Projects selected under the Critical Raw Materials Act (CRMA). Several elements of the proposal are troubling: shortened and binding assessment timelines, restrictions on raising arguments during judicial review, tacit approval of intermediary administrative steps for strategic projects, and provisions that could facilitate the use of “overriding public interest” arguments when environmental derogations are sought. This is notably relevant for Natura 2000 derogations under the Habitats Directive and deterioration of water bodies under the WFD. Taken together, these measures risk weakening the quality of environmental scrutiny and public participation, including meaningful participation and community consent, while increasing litigation risks.

Weakening environmental protection will not automatically accelerate mining approvals. In practice, projects that lack social acceptance are more likely to face legal challenges, local resistance, and reputational risks, which often result in delays rather than faster implementation.

The proposal refers to improving coordination and administrative capacity, but these measures remain largely broad commitment promises, and are unlikely to resolve the underlying structural capacity constraints, including staffing and resource limitations in competent authorities, compared to the procedural acceleration it introduces. Bottlenecks are typically administrative, stemming from insufficient knowledge, staffing and resources within competent authorities, rather than from environmental safeguards themselves.

If RESourceEU accelerates permitting while weakening the quality of assessments or access to justice, it may undermine both environmental integrity and strategic credibility. Acceleration must be strictly limited to administrative streamlining, with explicit guarantees that substantive environmental protections, public participation rights, community consent, and judicial oversight remain fully intact and enforceable.

## 7. BINDING DEMAND REDUCTION AS THE MISSING STRUCTURAL PILLAR

RESourceEU focuses heavily on diversification, stockpiling and acceleration of permitting, yet it does not introduce overall measures or strategies to reduce Europe's overall mineral footprint. This is a critical omission. The EU's per capita material footprint remains significantly above sustainable thresholds, and despite years of circular economy policies, absolute material consumption has not declined at the scale required to stay within planetary boundaries. The CRMA demand moderation measures and national circularity plans have so far borne little to no measurable results, and this must be accelerated with the same urgency as the sourcing of primary resources. This is also one of the conclusions of the EU Court of Auditors report. Without structural demand reduction, efforts to secure supply will lead to reinforcing extraction intensity rather than mitigating long-term risks. This risks locking the EU into a high-consumption, high-dependency pathway, where policy responses continuously chase supply constraints instead of addressing their root causes.

Mineral criticality is not only a function of supply concentration; it is also a function of total demand. The International Resource Panel has repeatedly highlighted that efficiency gains are often offset by rising consumption, a phenomenon commonly referred to as rebound effects, which can increase overall environmental pressures and associated social impacts. Policies that focus solely on efficiency, substitution or diversification without addressing absolute demand risk deepening rather than resolving structural vulnerabilities. A credible EU raw materials strategy must therefore integrate **binding demand reduction targets**, aligned with planetary boundaries and **sector-specific pathways** (e.g. mobility, construction, digital infrastructure). Without such targets, circularity risks remaining marginal and insufficient, while extraction pressures intensify. This is also strategic: reducing demand is one of the most effective and underutilised tools to enhance resilience, reduce geopolitical dependencies, and limit long-term economic and ecological risks.

## CONCLUSION

RESourceEU marks a decisive shift in EU raw materials policy toward greater centralisation, intervention and security framing, but its long-term legitimacy and effectiveness will depend on whether it is anchored in robust democratic governance, environmental integrity and human rights. Without binding safeguards, transparent allocation rules and meaningful parliamentary oversight, the concentration of power risks undermining public trust and accountability. At the same time, accelerating supply without addressing structural demand and ecological limits will only deepen Europe's dependencies and externalise impacts. A credible path to strategic autonomy must therefore move beyond short term supply security and be grounded in reduced extraction impact and material consumption, strong environmental law, fair international partnerships and public interest-driven governance. Only by aligning resilience with ecological stability, social justice and democratic control can the EU build a raw materials policy that is both secure and future-proof.

# SIGNATORIES





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