

Summary Document

CRUNCH TIME: Implementing the CRM Act for results

International Raw Materials Observatory

Brussels

Purpose and Objectives of Document

This report provides a comprehensive overview of insights gathered during an expert roundtable on a results-oriented implementation of the EU Critical Raw Materials Act (CRMA). The discussion, held under the Chatham House Rule, took place on December 11, 2024, in Brussels, connected to the EU Raw Materials Week. The event was organised by the International Raw Materials Observatory in collaboration with Latitude Five.

Background Information

The [Critical Raw Materials Act](#) is pivotal to Europe's future, aiming to balance environmental, societal, climate, and geopolitical imperatives. A successful implementation necessitates coordinated efforts as Member States work to streamline regulations, reconcile competing priorities, and adhere to strict timelines—all while addressing national interests, environmental concerns, and community expectations.

Policy-shapers and industry leaders, each playing critical roles in this transition, convened on the side-lines of the EU [Raw Materials Week](#) to deliberate on forthcoming challenges and opportunities for collaboration.

INTRAW seeks to foster a proactive approach to policy and strategy development—one that is both adaptable and responsive to a wide range of potential external developments. The recently published INTRAW [Future Mining Scenarios](#), developed in partnership with SAFE, were discussed as a strategic tool equipping policy-makers with a nuanced understanding of potential trajectories for the mining industry against the backdrop of the year 2050.

Summary of findings

Balancing Priorities

As with most large-scale industrial and infrastructure developments, mining and minerals activities elicit a wide range of expectations and positions. This dynamic is observed globally but is particularly pronounced within the EU, where a vibrant civil society actively engages in

economic, political, and societal debates. Broader issues, such as diminished trust in institutions and the polarisation of public discourse, can intersect with sector-specific challenges, exacerbating tensions around notions of public interest.

The mining and minerals sector faces considerable challenges in communicating its positive outcomes and best practices. A lack of a unified voice—partly due to the sector's fragmentation—and difficulties in (re)building trust while burdened with legacy issues further complicate the industry's position.

Similarly, gaps between EU institutions, Member States and other key players in mineral policy and value chains are evident across European initiatives including EU Strategic Projects, raw materials diplomacy and the planned EU demand aggregation platform. These misalignments underscore the need for a more cohesive approach.

Rising concerns around economic security have brought mining and minerals into the political spotlight, albeit without (yet) significantly altering the investment and market dynamics that underpin its growth. The stakes, however, are immediate and existential for both the sector and the EU.

To transition from ambition and expectations to effective outcomes, the EU must adopt a more cohesive and strategic approach to shift these dynamics. To ensure that European positions support growth, responsible investors and operators in mining need to convey their challenges and opportunities with greater coherence. Furthermore, all stakeholders must collaborate more effectively to achieve the shared goal of resilience.

Criticality of Trust

The critical role of trust in (re)designing resilient and responsible mineral value chains has been widely acknowledged and discussed in recent discourse.

It is important to revisit the concept of the trust equation: credibility, reliability, and intimacy collectively enhance a party's trustworthiness, while self-interest or self-orientation detracts from it. Perception plays a pivotal role, serving as the bridge between intent and outcomes.

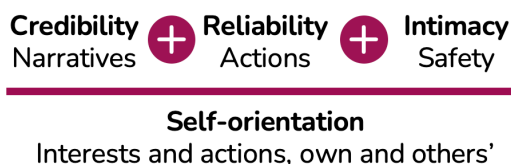


Figure 1: Equation of trust (Green, 2012).

Way forward

As the EU advances its Critical Raw Materials agenda, the path forward demands a strategic and coordinated approach that addresses the complexities of policy, stakeholder engagement, and societal expectations. Achieving these ambitions requires overcoming significant challenges, including fostering trust, aligning diverse priorities, and navigating the rapidly shifting geopolitical and environmental policy landscape. The following priorities outline a pathway towards resilient and responsible mineral value chains that equitably distribute benefits and responsibilities amongst Member States and stakeholders:

1. The EU will not achieve its Critical Raw Materials (CRM) ambitions without enlisting the support of allies, partners, and like-minded operators, including producing countries that can share best practices in community engagement, investors driving both performance and responsibility, and emerging markets seeking to capitalise on opportunities for growth.
2. Narratives and engagement strategies must be contextualised to ensure their effectiveness. The realities and specific needs of different regions and operations must be carefully considered and understood to foster trust and enhance acceptance of mining and minerals development. This is particularly critical in emerging markets, where governance structures may not provide operators or stakeholders with adequate protections.
3. Within the EU, there is a significant disconnect in the perception of mining and minerals—specifically regarding stakes, impacts, and risks: while EU institutions advance ambitious industrial and security strategies, national and regional governments struggle to embrace the sector, and local communities focus on competing land uses, socio-economic benefits, and long-term environmental consequences.
4. While mining and mineral operators routinely engage with regulators and local communities, often with notable success in the EU, this engagement may be less effective at the national level or with EU institutions. Conversations are further complicated by the presence of multiple stakeholders and voices—some claiming mandates that do not effectively drive their positioning, and others requiring additional information to address issues comprehensively.
5. EU Strategic Projects are likely to trigger strong public opposition, concentrating concerns around environmental impact, social acceptance, and governance capabilities within a limited number of operations that may or may not have the capacity to address them fully. It is therefore vital that all parties prepare for this eventuality and seek alignment on key priorities—from industry organisations to European and national policy shapers. Trust will be tested, and the quality of responses will ultimately determine the outcomes.

6. Substantial work remains to be done to shape a coherent European CRM strategy. As outlined in Mario Draghi's landmark report on competitiveness, this involves integrating industrial, trade, and competition policy with diplomacy. Furthermore, the EU must facilitate a holistic dialogue on business models, land use, mining legacy management, and the fair distribution of benefits and burdens across Member States.
7. It is crucial to recognise that the radical shifts caused by geopolitical and/or environmental shocks are generating significant confusion among electorates, both within the EU and globally. Long-standing narratives surrounding extractive industries, entrenched trade and competition positions within the context of globalisation, and even the perception of security are being profoundly disrupted, requiring societies to adapt swiftly—which, at times, can be painful.
8. Political commitment and accountability will be essential for bolstering trust within this complex landscape as new social contracts, business models, and international dynamics emerge.

References

Dhawan, Rohitesh, The most valuable commodity is trust — Keynote speech to BMO Global Metals, Mining & Critical Minerals Conference, 2023, <https://www.icmm.com/en-gb/presentations/2023/critical-minerals-conference> (accessed on 26 January 2025).

Draghi, Mario, The future of European competitiveness, 2024, https://commission.europa.eu/topics/strengthening-european-competitiveness/eucompetitiveness-looking-ahead_en (accessed on 26 January 2025).

European Union, Regulation (EU) 2024/1252 of the European Parliament and of the Council of 11 April 2024 establishing a framework for ensuring a secure and sustainable supply of critical raw materials and amending Regulations (EU) No 168/2013, (EU) 2018/858, (EU) 2018/1724 and (EU) 2019/1020 (Text with EEA relevance), 2024, https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=OJ:L_202401252 (accessed on 26 January 2025).

Green, Charles H., The Trust Equation, 2012, <https://trustedadvisor.com/why-trust-matters/understanding-trust/understanding-the-trust-equation> (accessed on 26 January 2025).

International Raw Materials Observatory, SAFE, Future Mining Scenarios, 2024, <https://intraw.eu/2050-scenarios/> (accessed on 26 January 2025).

Responsible Raw Materials, Material Value Chains: The Criticality of Trust, 2023, <https://responsiblerawmaterials.com/2023-conference/> (accessed on 26 January 2025).