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Going for the goods

- A study of the political process behind the EU's
Raw Materials Initiative

Master`s thesis in European Studies [revised edition]
Trondheim, May 2014

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Correction, p. 21: In order to highlight the importance of access to raw materials, it was therefore suggested to refer to “critical raw materials”, a term that would later be used on those raw materials that were considered to be the most important for the competitiveness of the European metals and minerals using down-stream industries (Hebestreit 2014).

To my grandmother, a caring and wonderful woman who I will never forget.

Acknowledgments

The current thesis marks the end of five years of education filled with incredible memories from Trondheim and abroad. Studying the political process of the Raw Materials Initiative (RMI) has been an interesting affair as it touches upon so many elements of the European integration. I want to thank my supervisor Hans Otto Frøland for his dedication, and for our fruitful discussions that have helped me navigate this academic universe. His “keep-going-on-attitude” has inspired me to keep working. I want to express my gratitude to each of the interviewees who have spent time to provide me with stories and facts that have been invaluable for the thesis’ final result. I also owe a special thanks to Bertine, Kathinka, Sunniva, Catrine and Charlotte for good discussions and proof reading – I am so grateful that you took your time! I am also glad for the support of Maria, Kristoffer and Christina, and the many good laughs and funny times with my co-students at 6b. Last, but not least, I want to thank my family. Mum, dad and my dear twin brother; thank you for your irreplaceable support in a semester where happenings have reminded me that life is about so much more than a thesis.

The thesis’ reflections are only but my own and I am responsible for any faults and errors in this thesis.

*Karoline Marie Thorvaldsen Aursland,
Trondheim, May 2014*

List of Abbreviations

ALTER-EU	Alliance for Lobbying Transparency and Ethics Regulation
CEO	Corporate Europe Observatory
CONCORD	Confederation for Cooperation of Relief and Development NGOs
CSR	Corporate social responsibility
DEVE	Development Committee
DG	Directorate General
EEB	European Environmental Bureau
EIP	European Innovation Partnership
EITI	Extractive Industries Transparency Initiative
EMIREC	European Mineral Research Council
EP	European Parliament
EPP	European People's Party
ERECON	European Rare Earths Competency Network
ERMC	European Raw Materials Club
ERMG	European Raw Materials Group
ETP SMR	European Technology Platform on Sustainable Mineral Resources
EU	European Union
FoE	Friends of the Earth
FoEE	Friend of the Earth Europe
GDI	German industry federation
Greens/EFA	Greens/European Free Alliance
INTA	Committee on International Trade
ITRE	Committee on Industry, Research and Energy
JP	Japan
MEP	Member of European Parliament

NGO	Non-governmental organization
OECD	The Organization for Economic Co-operation and Development
PCD	Policy Coherence for Development
RMI	Raw Materials Initiative
RMSG	Raw Materials Supply Group
S&D	Progressive Alliance of Socialists and Democrats
US	United States
WVM	Wirtschaftsvereinigung Metalle (German metal industry federation)
WTO	World Trade Organization

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1. Introduction: Recalling the old truth about resource security

– It was mostly about “where do we get the goods”, states a member of the European Parliament when asked about the political process of the Raw Materials Initiative (RMI). During the last decades, the European industry has faced several challenges which have made people open their eyes to a long existent, and rather well-known, issue: that there was no proper system in place to secure future access to raw materials. Externally, challenges arose as China developed as an emerging economy and started to restrict the export of crucial raw materials for European industry. Internally, an increasingly number of legislations to safeguard the environment made it difficult for companies to carry out mining in the European Union (EU). Hence, the European industry started remembering the old talks about the lack of a system that assured access to raw materials that were important for the EU economy (Hebestreit 2014). At the same time as this rediscovery Europe was about to enter a severe economic crisis. On the other hand China continued to flex its economic muscles. The country possessed over ninety-five per cent of the world’s stocks of rare earths, which were important in many types of production for European industry. In 2005 China started to impose a diminution of export quotas and signaled that the country would stop all export on these metals by 2015 (Euractive 2010). As a response to this increasingly urgent situation and systematic lobbying from the European metals and mining industries the Raw Materials Initiative (RMI) was launched by the European Commission (Commission) in 2008, and updated in a Communication in 2011. Focusing on the metals and mining industries, this thesis addresses the lobbying efforts throughout this political process.

Throughout the last decades the European metals and mining industry faced an increasing number of bottlenecks and competitiveness became challenging (Hebestreit 2014). The RMI process consists of many elements which can be seen in detail in the timeline in appendix 1. The RMI process started in 2003 when the German industry developed a strategy that resulted in cooperation with the German government. As a result of this cooperation Germany took the issue further in Spring of 2007 when the country held the position in the Council’s rotating Presidency and requested the Commission “to develop a coherent political approach to raw materials supplies for industry” (Council of the European Union 2007: 12). Based on a staff-working document the Commission then started preparing for the RMI. The RMI is a strategy that points to the dependence on raw materials for the sound functioning of the EU economy.

It contains three pillars related to 1) reducing export restrictions in international trade, 2) improving mining conditions inside Europe and 3) efficient use of materials and recycling of waste (European Commission 2008a). After the RMI was published in 2008, the Commission, and the industry and member states started to implement measures that were described in the Initiative. At the same time, the Commission, led by DG Enterprise and Industry (DG Enterprise), further examined how the strategy could be followed up. This was done in cooperation with industry and member states and occurred in the Commission's expert group the *Raw Materials Supply Group* (RMSG) and in the new trilateral cooperation between the EU, Japan and the United States (US) to mention a few. In 2010 more stakeholders became aware of the Initiative and started their work to influence the political process as the European Parliament (EP) started to prepare a resolution on raw materials. In addition, the Commission held a public consultation to prepare for a second RMI which was launched in February 2011. The EPs resolution was published in July 2011. Since then, the Commission has continued to follow up the RMI and reports to the EP and the Council on the implementation of the strategy.

According to Fielder (2000) the Single European Act (SEA) was largely realized after serious efforts of industrial actors to open up markets to free trade in order to create economic growth for the European economies. Since then the EU has met critique from its sceptic opponents, who claim that the EU is a capitalist project founded to promote the European consumer (Shore 2000). Like the SEA, the RMI can be seen as a result of determined strategies from industrial actors. It is currently six year since the Initiative was launched by the Commission. In this period the Initiative has developed into concrete European projects on raw materials, policy actions, legislative proposals and coordination of member states' minerals policies. Hence, while the RMI process indicates that a new policy area has entered the European arena, it has also become integrated in the other policy areas of the EU. The RMI covers a broad range of issues,¹ and thus affects many stakeholders. The political process has relied largely on independent initiatives and efforts by interest groups. In this regard it is relevant to ask which interests have gained influence in designing the RMI. That is the topic of this thesis.

Further, and with regards to the EUs international relations, the RMI can be seen in the light of a highly debated topic in international economy, namely ethical trade. The EU is concerned

¹ E.g. trade, development and environment and foreign affairs (European Commission 2008a).

to strengthen the use of free trade and liberal values to get access to raw materials so that they can use World Trade Organization (WTO) and bilateral agreements to remove so-called “unfair” market distortions (European Commission 2008a). There has been current critique of the EU’s strategy to get hold of the raw materials, coming from members of parliament (MEPs) and NGOs.² One argument has been that the RMI risks being inconsistent with the broader development policy of the EU (Curtis 2010). At the same time voices have been raised towards the EU because it has been too focused on the internal trade, and thus has been less focused on free trade with third countries. In that regard, it appears that the EU finds itself subject for critics neither of which choice it makes. Either way, as states and actors often seek legitimacy for political actions, a question will be weather the RMI will affect the image of the EU, and if so, in what way? The thesis will not discuss this question further, but the thesis may form a basis for such a debate.

1.1 The Raw Materials Initiative

What was the Raw Materials Initiative (RMI) and why did actors get involved in its political process? To understand the RMI process one needs to look at what a Commission communication really is, and what areas the RMI covered. The purpose of this section is therefore to account for a short presentation of the Initiative.

The RMI was a Communication published by the Commission in November 2008. It underlined that the situation on access to raw materials was critical: “fundamental changes in global markets are threatening the competitiveness of European industry” because emerging countries were taking “measures that distort international trade in raw materials” (European Commission 2008a: 4). According to the Communication, this development was particularly challenging for the construction, chemicals, automotive, aerospace, machinery and equipment sectors which were highly dependent on access to raw materials. High-tech metals were mentioned as particularly critical in many applications, among which are the production of consumer goods, green technologies and national defense equipment (European Commission 2008a). To secure “access to raw materials at fair and undistorted prices” the Commission proposed a *strategy* on raw materials based on three pillars:

² E.g. Friends of the Earth (FoE), Oxfam, Comhlamh, Traidcraft, Concord.

- 1) Ensure access to raw materials from international markets under the same conditions as other industrial competitors. Using so-called “raw material diplomacy” was important;
- 2) Set the right framework conditions within the EU in order to foster sustainable supply of raw materials from European sources;
- 3) Boost overall resource efficiency and promote recycling to reduce the EU’s consumption of primary raw materials and decrease the relative import dependence.

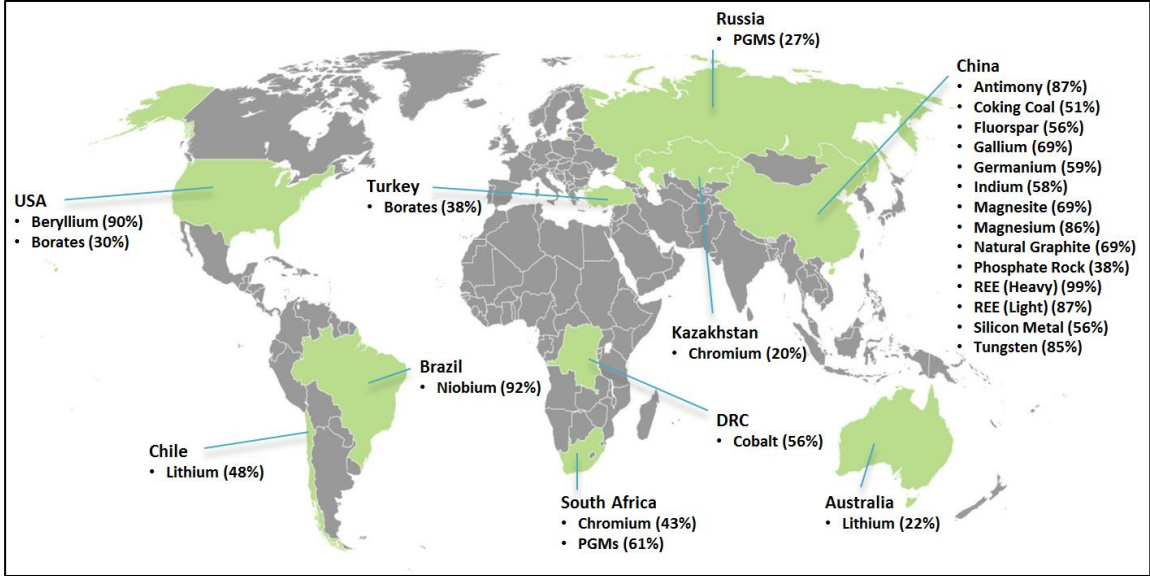
As previously indicated, the RMI is a strategy and not a legislative proposal. This means that the Council and the EP are not required to amend proposals and agree in the same way that is required in a normal legislative procedure.³ Whilst a legislative procedure follows a particular model, in which actors have more defined roles, for a communication the process can develop into different possible pathways. Hence, a communication leaves actors with a larger playing field in which the individual initiatives of the contributing parts shape and advance the political process. That the RMI was designed as a communication and not a legislative proposal is crucial for understanding the dynamics of the RMI’s political process. The analysis will show that the decision to address the issue of raw materials in a communication was in fact a strategic choice by the European metals and mining industries.

To understand exactly why the RMI took the form it did, it is useful to look at which competences⁴ the EU possesses especially related to the three pillars. Many of the raw materials that were crucial for the European industry existed outside Europe, particularly in China, but also countries like Brazil, and the Democratic Republic of Congo. Figure 1.1 shows that China possessed a large amount of the world reserves of raw materials that were predominantly important for the European industry. Here, rare earths were especially important. Rare earths elements (REE) are metals that are increasingly used as alloys to change properties of primary metals by making them stronger and lighter, and which therefore are used in a variety of productions (International Policy Digest 2012).

³ Ordinary legislative procedure (OLP) is used on most policy areas after the Lisbon Treaty of 2009 (Cini and Borragán 2013).

⁴ A competence is the legal capacity to deal with a matter (Cini and Borragán 2013).

Figure 1.1 Major supplying countries of the EU critical raw materials



Source: Oakdene Hollins and Fraunhofer ISI (2013: 2).

To negotiate trade is an exclusively EU competence. To see China and other countries lifting their export restrictions, the industry looked to the EU for their competence in trade negotiations.⁵ The EU's Common Commercial Policy (CCP) works to promote international trade and to remove practices by key trading partners which are considered to be unfair. In this policy the EU also works through the structures of the WTO (Cini and Barragán 2013). As the thesis will show, the European metals industry was particularly concerned with the RMI's first pillar on trade because it relied largely on access to third markets. The first pillar also affected the development policy of the EU.⁶ The analysis will show that development NGOs became much concerned with the first pillar.⁷ Going back to the concerns of the metals and mining industries, the third pillar related to environmental policy was also important because issues like recycling of raw materials and using resources efficiently was considered pivotal to secure its future competitiveness. Environmental policy is a shared competence between the EU and member states (TFEU 2010: article 3), but nearly all environmental policy in Europe is made in, or in close cooperation with, the EU (Cini and Borrágán 2013). In the light of this it makes sense that the EU institutions became a natural target for industry and other stakeholders specifically concerned with environmental issues. The second pillar on improving the conditions for mining activities inside the EU however, touches upon the responsibility of member states. Thus, on minerals policy the EU shall not replace the

⁵ Commercial and competition policy are both exclusive Union competences⁵ (TFEU 2010: article 3 and 207).
⁶ Development policy is a shared competence between the EU and member states (TFEU 2010: article 4).
⁷ The RMI pillar also affected the foreign policy of the EU which is also a shared competence between the EU and member states. Stakeholders interested in promoting a more militarized EU were early involved in the political process.

competence of member states, but rather have the competence to carry out actions to support, coordinate or supplement the actions of its members (TFEU 2010: article 6). Accordingly, each country is responsible for its national minerals policies (Hebestreit 2014). This naturally explains the involvement of member states and in particular their national geological surveys. The three pillars are interrelated and equally important to explain which interests that took part in the process. The EU competences explain why industrial actors from the metals and mining industries, and environmental and developing NGOs lobbied towards the European institutions.

The second RMI was launched on February 2nd in 2011 (European Commission 2011a). The report describes implementation of the strategy and indicates further action with regards to the three pillars (European Commission 2011a). The RMI's focus remained much the same as in 2008. However, the first pillar signaled a less aggressive trade strategy (Lambert 2011). With regards to the development policy of the EU, compared to the first RMI, the second RMI took further into account the interests of poor recourse rich countries. Additionally, the second and third pillars are more closely described. A central example in this thesis will be the requirement to enforce EU's already existing legislation on the treatment of waste.

Furthermore, the second RMI made it clear that the development of the Initiative took place in a political context. In fact, the second RMI is found in a communication where the Commission described the EU's overall strategy on commodity markets.⁸ Also, by 2011 the RMI has become a part of the EU's growth strategy Europe 2020.⁹

1.2 Existing literature on the Raw Materials Initiative

As the RMI is a relatively recent policy area in the EU, limited research exists on this topic. Some contributions have nevertheless been made. Corporate Europe Observatory¹⁰ (CEO) describes the role of European, and especially German, industry's activity to forward the question of access to raw materials to the European level. With a critical voice CEO (2011)

⁸ The Communication included energy, metals and minerals, agriculture and food (European Commission 2011a).

⁹ Europe 2020 includes seven flagship initiatives. One of the flagships is the flagship initiative for a resource efficient Europe which aims to make Europe move towards a low-carbon economy by 2050 (European Commission 2011b). The Europe 2020 Strategy was presented by the EU in March 2010 (European Commission 2010d).

¹⁰ CEO is a research and campaign group that works "to expose and challenge the privileged access and influence enjoyed by corporations and their lobby groups in EU policy making" (CEO no date).

also describes the role of vested interests to in the RMI process. Accordingly, MEPs from the European People's Party (EPP) promoting the raw materials policy in the EP had close links to industry sectors. Alliance for Lobbying Transparency and Ethics Regulation (ALTER-EU) describes in numbers the dominance of corporate interests in the Commission's¹¹ expert groups and uses the ad-hoc group to define critical raw materials as an example of how expert groups can be crucial in the drawing out of new policy (ALTER-EU 2012).

Rosenau-Tornow et.al (2009)¹² identify and assess the long-term supply risks for mineral raw materials with the aim of helping companies to make better decisions. Tiess (2010) notes that the EU relies on the import of large amounts of metallic minerals and that access to these materials are increasingly difficult. Considering its crucial significance for European industry, actions to secure supply of raw materials started rather late (Tiess 2010). Additionally, if the European debate on the current raw materials policy meets further obstacles, the risk of increasing protectionist measures of resource rich countries may occur (Tiess 2010). Again, stating the particular role of China, some scholars have pointed to the last years' growing competition from this country to explain the RMI (Leeb and Dorsey as described in Thull 2013; Stahl 2011). Stahl (2011) points to the Chinese engagement towards Africa which has, for historical reasons,¹³ resulted in a significant reaction in Europe. Stahl (2011) argues that while the earlier relationship between EU and Africa has been characterized by development aid and poverty reduction in African countries, China's resource diplomacy towards the continent has influenced the character of the EU-Africa relations. The author also refers to the Chinese involvement in Africa as possibly undermining the Lisbon Strategy, which aims to strengthen the competitiveness of the EU. However, instead of predicting future rivalry between China and the EU, Stahl (2011) argues for a cooperative approach between the two actors.

Contributions have been further made with regards to the possible impact of the RMI for developing countries. Curtis (2010) presents the possible negative effects and is concerned that developing countries may be subjected to "a vicious circle of poverty" as the current situation in several raw materials sectors are already characterized by low governmental revenues and few gains for local society (Curtis 2010: 4). Taking away developing countries' ability to use export restrictions to protect their own markets will ease foreign investment that

¹¹ DG Enterprise.

¹² Representing the Volkswagen AG and the German Federal Institute for Geosciences and Natural Resources

¹³ Europe's engagement in Africa during the colonial period in the 19th and 20th centuries.

can worsen the situation of human rights and labor conditions, and harm the environment. Lambert (2011) finds that despite the increased focus on improving framework conditions inside the EU and to ensure environmental issues, trade policy still plays an important role and threatens the development of resource rich countries.

1.3 Research question and research design

This thesis seeks to find out which interests have gained influence in the political process of the RMI. In this regard, previous research provides different answers to the question of which interests that tend to influence the European policy process more generally. As Dür (2012) and Woll (2012) have studied the forming of European trade policy, their arguments are particularly relevant for this thesis. Dür (2012) argues that business interests to a large degree dominate the EU's policy-making in foreign economic policy. The author argues that the central role of business is not due to effective euro associations. Rather, it is a result of the reactive lobbying of concentrated economic interests. This reactive lobbying takes place in cases where the EU policy implies costs for business' interests and in cases where the policy of third countries harms European economic interests. In short, Dür (2012) points to business' many access points to explain their influence: it has access to national governments, the Commission and the European Parliament. To support his argument, Dür (2012) describes how many of the EU's significant bilateral agreements are the results of lobbying by European exporters. Furthermore, even though NGOs may also have good access to policy-makers, "NGOs that defend positions that do not directly, and in a concentrated manner, affect the economic interests of their supporters in most cases are not able to counter the influence wielded by concentrated interests" (Dür 2012: 182). This is partly explained with that, compared to business actors, NGOs concerns are not those concerns that are viewed as the most important by the Commission.

Countering the argument of Dür, Woll (2012) focuses on the autonomy and agenda of the Commission itself. The author argues that the interest of the Commission determines the influence of stakeholders. This autonomy can partly be found in the structures of the EU system. Furthermore, the Commission may have a geo-political role and hence seek to balance against big powers such as the United States (US) or to containing China. In short, Woll (2012) argues that the stakeholder' key to success is found where they correspond with the interests of the Commission (Woll 2012). One central example is that the Commission

invited business to participate in the international negotiations in the Uruguay Round¹⁴ in order to strengthen the negotiating position of the Commission (Woll 2012).

Arguably, to analyze interest representation is of great concern for a moral assessment of European integration (Dür 2012). However, it is not only relevant to investigate which interests that in the end had the most profound influence on European policy-making. It is also relevant to evaluate to what degree different stakeholders take part in the political process. In order to participate, access to relevant information, participation in and access to discussion fora, will facilitate the participation of interest groups (Crombez 2003). To study the European policy processes is a complex matter because there are many interest groups and different ways of gaining influence. Due to the scope of the present thesis, the aim is not to provide the view of all the actors that have taken part in the process. The thesis will rather follow a handful of actors throughout the political process. It is considered that doing so will be sufficient to fulfill the thesis' purpose.

To answer the main research question about which interests have gained influence in the RMI's political process, the thesis has three sequential focuses; (i) the process towards the first RMI in 2008, (ii) the process towards second RMI in 2011 and (iii) the actual results of the strategy. The first focus is especially concerned with the agenda setting power. As in most policy processes in the EU the Commission depended on particular information to formulate the Initiative. Who sat the agenda? How did they do it, and why? The second focus addresses the dynamics of the process after the RMI was published in 2008 and towards the second RMI in 2011. It also addresses the process up until the publication of the EP resolution in July 2011. Which interest groups became involved after the RMI was launched? How did they get involved and did they manage to influence the political process? Also, how did the increased number of stakeholders impact on the objectives of the agenda setters? The third aspect looks at how the strategy was followed up in concrete action through policy actions, the drafting of new legislation, and development of cooperation, projects and creation of institutional structures. Hence, the third focus collects the threads from the previous chapters and answers which interests have gained influence in the designing of the RMI.

The thesis is a process analysis and relies on documents and interviews. In order to study how the RMI came into being and how it developed, primary sources emerging from the process will be used. Primary sources accounts for the information provided by the Commission, the

¹⁴ From 1986-1993.

EP and the Council. This information takes the form of the Commission's working documents, proposals for new legislation, reports and resolutions from the EP. The Commission's own summary of the 2008 consultation and stakeholders' written contributions during the 2010 public consultation, will be used to identify the position of stakeholders and thus the further development of the political process. Using online publications from research groups and media coverage will further clarify the position of the actors involved.

Second, to get a genuine understanding of the RMI process, one needs to go beyond the exclusive examination of primary documents. The process of the RMI, like all political processes, is a unique case. It is therefore useful to speak with people who took part in the process - to understand their strategies, actions and experiences. Representatives from the Commission, the EP, the metals and mining industries, NGOs, research institutions and consultative bodies of the EU¹⁵ were particular interesting sources in regards to this thesis. With regards to the argument of Dür (2014) that business interests plays a central role in the trade policy of the EU, the Commission's ad-hoc group on defining critical raw materials¹⁶ was interesting to explore. With this objective in mind, forty-six invitations were sent out to people within the mentioned institutions, and to those who were considered to have good knowledge about the RMI process. Accordingly, in the period from January 27th to February 13th in 2014, twelve people were interviewed about the RMI process. These people represent most of the mentioned actors. It was considered appropriate to treat the interviewees as experts on the RMI process and the method used on eleven of the interviewees is therefore semi-structured elite interviews with open-ended questions (Leech 2002a). Using semi-structured interviews as method made it possible for the interviewees to be experts and provide me with new insight of the process (Leech 2002b). Two of these interviews were conducted on the phone, while the rest of them were face to face meetings in Brussels. The interviews can be said to resemble a conversation. While there was room for the respondents to speak relatively freely about the topic and thus possibly reveal new information, an interview guide was followed to make sure particular questions were sufficiently answered (see appendix 3 for example). The twelfth respondent answered some pre-defined questions via e-mail received on the February 28th. Thus, information acquired through interviews with the twelve persons presented in table 1.2 will lay the foundation for the thesis' analysis.

¹⁵ Such as the European Economic and Social Committee.

¹⁶ The ad-hoc group on criticality was established under the expert group the Raw Materials Supply Group (RMSG) and will be further presented in chapter three.

Table 1.2 Interviewees to master's thesis

EU INSTITUTIONS

European Commission

- Paul Anciaux, Policy officer in charge of raw materials and non-energy extractive industries, DG Enterprise and Industry.
- Werner Bosmans, Policy officer on resource efficiency, DG Environment.
- Magnus Gislev, Policy officer on raw materials, DG Enterprise.
- Niall Lawlor, Policy officer from external staff¹⁷.

European Parliament

- Judith Sargentini, MEP - Greens/EFA¹⁸.
- Judith Merkies, MEP - S&D¹⁹. Shadow rapporteur on the Bütikofer-report.
- Roderick Kefferputz, Parliamentary assistant for Reinhard Bütikofer - Greens/EFA.

CORPORATE INTERESTS

- Corina Hebestreit, Director of Euromines.
- Interviewee1, Responsible for trade affairs in a private company of a EU member state (member of Eurometaux)²⁰.
- Matthias Reimann, Geologist, Knauf Gips KG.

NGOs

- Koen Warmenbol, Coordinator of the task force Raw Materials of CONCORD²¹ and Policy Officer at 11.11.11.

EXPERTS FROM MEMBER STATES

- Andrew Bloodworth, Science director for minerals and waste, British Geological Surveys.

Importantly, nearly all interviewees have additional positions that are crucial to understand their role in the political process. Due to limited space these were not included in the table above. I therefore strongly urge the reader to have a closer look at appendix 2 where all the interviewees' positions are accounted for.

The interviews were transcribed from the recorder immediately after each meeting. A possible disadvantage when using a recorder is that the interviewees might be uncomfortable to speak

¹⁷ The title is made according to the wish of the interviewee.

¹⁸ European Free Alliance.

¹⁹ Group of the Progressive Alliance of Socialists and Democrats.

²⁰ Anonymity has been done in accordance with the interviewee's desire.

²¹ Confederation for Cooperation of Relief and Development NGOs.

freely about the topic. However, the interviewees were experts on their topic and more or less used to being interviewed.²² Accordingly, they did not seem to pay much attention to the recorder. Further, the advantage of using a recorder is that it is possible to go back to the interviews and assure a correct understanding of what the interviewees were saying. The interviewees, their objectives, strategies and way of working towards the RMI will be presented more closely in chapter two and three. Each actor will be presented consecutively as they were involved in the process.

Using interview as a method to study the RMI process requires the consideration of several particular issues. First, as the process started around ten years ago one may ask whether the interviewees have a correct memory of what happened. During the interviews some stated on several occasions that they had problems remembering details. To reduce using faulty information it has been relied on information that the interviewees seemed to remember well. Second, another risk is related to whether the interviewees were speaking the truth about his/her own role and the role of colleagues. The EU system has been under critical scrutiny on several occasions. One relevant example is the critical voices raised towards the lack of transparency in the EU's political processes. As a response to these voices, the Commission launched the Transparency Register in 2011,²³ but this is not yet considered to be sufficient to increase transparency (ALTER-EU 2014).²⁴ Also, the Transparency Register was not in place during most of the RMI process. Inter-related to the question of transparency are the critics targeted towards several MEPs because of their close relations to commercial interests (CEO 2011). As the thesis will show, in parts of the RMI process, one may find problems of both lack of transparency and vested interests among central MEPs. Mirroring this, the interviewees could be perceived as diplomatic or even defensive when not wanting to discuss issues they found particularly problematic— even though they were not directly involved. In general however, the interviewees did not seem to limit themselves. On the other hand, they were surprisingly open about the extensive lobbying of the EU institutions and did not seem to avoid any of the questions. Their openness may be explained by the fact that all interviewees were asked about how to quote them. They were also assured a quote check would be provided and that the recorded interviews would be deleted as soon as the thesis was published. Hence, the information provided through interviews is considered well suited for

²² Some of the interviewees referred to former interview experiences.

²³ This year, the Commission and the EP got a common register. The EP had a register already since 1996, while the Commission established a register in 2008 (European Parliament 2011).

²⁴ One argument is that the register has to be made compulsory and not be based on voluntary registering (ALTER-EU 2014).

analyzing the RMI process. Furthermore, using interviews as a method has provided a unique possibility to examine the actual political process. Meeting these people in person has arguably made it possible to understand the social dimension of the political process even better than any document could have provided. Their individual characters, charismas and engagement made it easier to identify the unspoken sensations and feelings towards the RMI process. The interviewees have all confirmed and accepted the use of the quotes in this thesis. It is important to note that the interviewees are quoted in their personal capacity and do not talk on behalf of the actor they represent. In addition to the interviews, draft documents and email correspondence between the stakeholders – information obtained through interviews - are also used in the analysis of this thesis.

1.4 Conceptual approach

This section sets out the theoretical framework on which the analysis is built. The purpose of using the concept of lobbying is to understand the RMI process which was, as many political processes in the EU, complex. For practical reasons, the thesis is therefore based on the assumption that particular stakeholders share some core common concerns and that these concerns cross borders. On the one side industrial stakeholders all have a core *material* interest. On the other side NGOs can be said to have a *non-material* interest that is based on idealistic values. Hence, the thesis builds on Greenwood's (2011) argument that the stakeholders that generally oppose the logic of market integration, may have to redefine their interests in order to influence the political process. The examples of industry and NGOs are used in this thesis to simplify the complex process and to clarify the "main divisions" of interests.

This thesis defines lobbying as "activities carried out with the objective of influencing the policy formulation and decision-making processes of the European institutions" (European Commission 2008b). In this regard all stakeholders in the RMI process can be considered to be lobbyists. Further, several authors (Broscheid and Coen 2007; Bouwen 2002; Mahoney 2007) refer to the *informational approach* as important to influence policy-making. Stakeholders gain *access* to the policy-making process because decision-makers need particular information in order to develop new policy. This participation is benefiting for interest groups because they can obtain particular information from the decision-makers who makes it easier to prepare and assure lobbying is targeted where it will be the most efficient. None the least, EU decision-makers also benefit from the participation of interest groups

(Coen 2007). The Commission does not have comprehensive in-depth sector knowledge. In order to draw out credible and legitimate new policies the Commission therefore relies on the information of external actors (Gullberg 2008; Broscheid and Coen 2003; Greenwood 2011). In this regard, Guéguen (2008) finds that a success criteria for interest groups to influence EU policy, is that the information provided is technical rather than political in nature. Another way to achieve influence is to favor European solutions to European problems (Guéguen 2008).

Broscheid and Coen (2007) state that interest groups will be rewarded by maintaining access if they provide the Commission with good and reliable information. Stakeholders therefore have an incentive to provide useful information to decision-makers. At the same time, because the Commission is always concerned to ensure its legitimacy, more stakeholders can be invited into fora and thus obtain access to policy making. This raises the challenge of getting useful information from stakeholders because, as more actors get access, the policy domain gets crowded and stakeholders' incentive to provide accurate information decreases. In fact, when the interest representation gets too large – when there is an access overload – stakeholders are more likely to babble (Broscheid and Coen 2007). This is insignificant and against the intention of the Commission which therefore seeks to create incentives against babbling. Again, to select insiders it can create new fora for interest representation that will be regularly consulted throughout the political process (Broscheid and Coen 2007).

Importantly, while several interest groups can obtain some kind of access, the real insider lobbyists are actors that will maintain a privileged position even after the Commission has sought to limit the amount of babbling. Insiders are those stakeholders which are consulted or which are actively involved in bargaining and policy negotiations or the implementation of policy solutions (Broscheid and Coen 2007). These privileged actors develop a good understanding of the policy developments. Their understanding grows with experience and facilitates lobbying. In fact, Gullberg (2008) and Guéguen (2008) find that to succeed in gaining influence, lobbying should be a *long term interaction* with decision-makers.

Another related way of possibly ensuring efficient lobbying is through *coalition activity* which is much about sharing resources. According to Mahoney (2007) groups with limited resources can seek to maximize their achievements through cooperation with others by sharing information and working out a clear position before involving in the actual policy process. Importantly, another incentive to create coalitions is to signal broad public support for a particular policy (Mahoney 2007). However, the degree of influence requires that

stakeholders are members of the most relevant coalition and they need to develop, agree on and implement an effective coalition strategy. Again, with regards to the value of information to gain influence, stakeholders must use their expert information to formulate contributions that are useful for policy makers.

1.5 Structure and argument in brief

The following chapters account for the analysis and take the reader through the RMI process. Chapter two starts with presenting the historical background behind the lobbying efforts that started in the new millennium. By doing so it sets the political process in a historical context. The chapter goes on to address the concerns of the metals and mining industries and their lobbying efforts towards the German government and the European institutions. Chapter three illustrates the complexity of the process as it deals with how industry worked to implement the Strategy up until 2011, and how MEPs and NGOs discovered the Initiative and then started efforts to promote their respective concerns. The chapter shows that the metals and mining industry took on particularly active roles in the Commission's ad-hoc groups and in the cooperation with MEPs. It also shows that industry's concerns were dealt with in the trilateral cooperation between the EU, Japan and the US. Chapter four draws on the information provided in the previous chapters and reveals the results of the lobbying efforts of the metals and mining industries and the NGOs respectively. By doing so, it shows that industry successfully pursued its objective to secure access to raw materials. The thesis' conclusion sums up the thesis' main arguments. The overall conclusion is that a variety of stakeholders have participated in the political process. At the same time, the metals and mining industries had clear and well thought out strategies that assured them an exclusive and central position throughout the whole process. In addition to this, the EU's political foundation on free trade and open markets principles, made industry assume privileged access to policy-makers. Hence, industry largely achieved their objectives. As such, the RMI process is a classic illustration of the political workings of the EU-system.

2. The policy process towards the 2008 Communication: Setting the agenda

What was the background for the RMI? Which stakeholders were driving the idea to establish a European raw materials policy? What exactly was their interest? And how did they work to promote these interests when faced with the formal EU decision makers? This chapter deals with the first of the thesis' three focuses, namely agenda-setting: the process towards the first RMI in 2008. The chapter will show that the beginning of the process can be seen in the light of changes in the external market and as a result of difficult mining conditions inside Europe. The lobbying organization for European non-ferrous metals industry *Eurometaux* was mainly concerned with access to rare earths and other non-ferrous metals, and managed to develop cooperation with the German government that resulted in a national raw materials strategy in Germany. When Germany held the Council's rotating Presidency in the spring of 2007, raw materials were described as one priority. Consequently, the argument is that *Eurometaux* used the German government as a "tool" to reach the attention of European policy makers. Second, when the Council Conclusions were published and the Commission was given a political "go" to look into the issue of raw materials, the association for European metals and minerals mining industry *Euromines* took over the baton. For several years, the association had been facing a difficult mining situation inside Europe and worked closely with the Commission to ameliorate the situation. Over several years, good relations and trust developed between the Commission and *Euromines*. In addition to participation in the Raw Materials Supply Group (RMSG), these close relations made it possible for *Euromines* to assume a central role in the writing of the staff-working document that provided the background for the first RMI.

2.1 Lobby initiatives from the European industry

The original talks about the issue of access to raw materials started many years before the current debate on the RMI. Taking a look at the historical development of this issue, it becomes clear that the question has gotten on the agenda in times when the quality of access conditions has decreased. When raw materials prices have increased there has been a fear of future access to raw materials, and states have sought to hold on tight to their natural resources. This is described by Buijs and Sievers (2011) as resource nationalism. In fact, industry had been well aware that its supply of raw materials could be challenged by developments in the market. A good example in this regard is the boom in nearly all

commodity prices in the early 1970s (Cooper and Lawrence 1976). Like the current case of the RMI, the Commission addressed the issue in that period. In 1975 the Commission published a Communication stating that obstacles could hinder access to raw materials in the future (European Commission 1975). Arguably, the challenges in 1975 and the proposals as to how the situation could be improved were very much the same as in the RMI process. Then, as today, proposals concerned the need to ensure favorable conditions in the area of trade, for coordination of information from member states, research and sustainability (European Commission 1975).

However, the fear of high prices seemed to fade away in the 1980s and 1990s. With the preparation of the SEA, which came into effect in 1987, and as the cold war was going to an end, states were less concerned with the supply risk and the development of national minerals policies. It was considered that the opening of markets and increased trade between states would secure the necessary supply of raw materials. Many former state-owned mining companies were privatized, and states thereby became less directly involved in the extractive activities (Buijs and Sievers 2011). Overall, the assumption of a well-functioning raw materials market prevailed throughout the 1990s. However, the situation changed as China's economic growth started to influence the market around the beginning of 2000 (Buijs and Sievers 2011). The country consumed and produced raw materials in increasingly large amounts. On its side, European industry found itself in a situation where some of the raw materials, for example rare earths, that had been produced in Western Europe, now were manufactured in China due to less expensive labor (Buijs and Sievers 2011). In addition, the early years of the new millennium brought a range of EU legislation that protected natural areas in member states and thereby reduced the potential mining sites in the EU. Hence, not only did it become increasingly difficult to carry out extractive activities from European sources, the procedures to get an exploration and extraction permit were expensive and took many years. The situation deterred companies from investing in such activities in Europe (European Commission 2010c). On top of this, mining accidents in Spain and Romania, which caused damage on the environment, and the poor conditions in the mines of the Eastern new members, resulted in a fear of an "image burden" that could further weaken the legitimacy of European industry (Hebestreit 2014). Echoing the situation in the 1970s, European industry and member states therefore started recalling that supply of raw materials was not guaranteed. China's possession of raw materials, such as rare earths, was especially critical for Germany which relied largely on import for its processing industries. In Europe,

the country played a central role in the manufacturing and processing of metals and the country relied on import of raw materials to export its processed and manufactured products (German Business Portal 2014).²⁵ Consequently, the metals industry was also important to the national economy as it employed over four million people (Eurofound 2010).²⁶ In 2005, as there was no proper system in place to secure access to raw materials neither with regards to access in third countries nor inside the EU, industry realized the severity of the situation. It was decided that something had to be done (Hebestreit 2014).

As a response to the rising challenges the European Mineral Research Council (EMIREC) was created by people from up – and downstream industries, academia and research institutions. The informal network sought to convince more industrial stakeholders that measures were necessary in order to secure future supply of raw materials (Hebestreit 2014). In March 2005 EMIREC set up a technology platform²⁷ that sought to address research needs and thereby strengthen the competitiveness of the extractive industries and related downstream sectors.

Eurometaux was a member of the technology platform and the main lobbying body of the European non-ferrous metals industry (Eurometaux 2012a). Eurometaux was established to make the industry capable of acting “*collectively* and in a *coordinated* manner at all levels” of the European policy processes, as seventy-five per cent of the EU activities²⁸ affected the operation activities for this industry (Eurometaux 2012a). Hence, situated near the EU institutions in Brussels, the association constituted fifty-five members from the non-ferrous metals industry at the national, European and international level (see appendix 4 for list of membership). Eurometaux was concerned with sufficient access of raw materials for its members and thus had common interests with the technology platform. In addition to having trade as one of its main concerns, sustainability was at the very center of its interests (Eurometaux 2012a). In fact, Eurometaux had developed a plan to create awareness and alliance building on raw materials back in 2003. As a respond to this, the German industry federation (GDI) established a task force on raw materials and held a conference on the topic in 2005 (CEO 2011). That same year, one of Eurometaux’ members established an office in Brussels and took on an important role in promoting the issue: the German metal industry

²⁵ The industry consists of the steel and iron, non-ferrous metals and foundry industries. In 2012 Germany was one of the world’s largest raw materials consumers (The German Business Portal 2014).

²⁶ Numbers from 2008.

²⁷ European Technology Platform on Sustainable Mineral Resources (ETP SMR).

²⁸ legislation, rules and practices.

federation Wirtschaftsvereinigung Metalle (WVM) represented the economic interests of 665²⁹ companies and was thus a significant voice from the non-ferrous metals industry in a country where the sector played a pivotal role for the national economy (WVM 2014).³⁰ In close cooperation with the German metal industry federation WVM³¹ and the German government, the GDI task force reached a consensus on three issues. First, access to raw materials affected all industries. Second, the formulation of a raw materials strategy was a joint task for industry and the German state. And third, the raw materials strategy cut across all policy fields on the national and the EU level and thus suggested a comprehensive approach (CEO 2011). The consensus between the German industry and government became operationalized when the German government issued a national strategy on raw materials and established a ministerial working group in 2007 (CEO 2011). Also, in line with the strategy of Eurometaux to raise awareness on raw materials, Germany initiated a discussion on raw materials supply at the G8 Summit on June 6th to 8th in 2007 (Federal Ministry of Economics and Technology 2010; ETP SMR 2007).

The rotating Presidency of the Council of the EU is held by a member state in six months and provides members with an opportunity to prioritize policy areas of particular national priority and interest (Lewis in Cini and Borragán 2013). In the spring of 2007 Germany held the position in the rotating Presidency. In accordance with the German national strategy the country chose raw material as one priority. In the German work program for the 2007 spring semester it is stated that “In extending economic relations, the Presidency will (...) opening the Chinese markets more widely for services and removing distortions of competition in the field of raw materials” (The German Federal Government 2007). Consequently, on May 21st in 2007 the Competition Council, consisting of the competition ministers of the EU, requested the Commission

to develop a coherent political approach with regard to raw materials supplies for industry, including all relevant areas of policy (foreign affairs, trade, environmental, development and research and innovation policy) and to identify appropriate measures for cost-effective, reliable and environmentally friendly access to and exploitation of natural resources, secondary raw materials and recyclable waste, especially concerning third-country markets (Council of the European Union 2007).

This statement is especially in line with the consensus made between WVM and the German government that access to raw materials affected all industries and that a raw materials

²⁹ Note that the numbers of companies may have been another in 2005. These are considered to be 2014 numbers.

³⁰ Company members of WVM accounted for 108 740 employees (WVM 2014).

³¹ WVM established a Brussels office in 2005 (WVM 2014).

strategy cut across all policy fields, and thus suggested a comprehensive approach. At the same time, the conclusion's particular reference to access "third-country markets" can be seen as reflecting the need to address the restrictive measures imposed by China. Also, the conclusions refer to the access and exploitations of natural resources, secondary raw materials and recyclable waste. The concerns of the metals industry to pursue these issues are reflected and suggested to be in line with the interests of Eurometaux to promote sustainability and beneficial conditions in international trade. The thesis will show that these concerns can be found throughout the whole RMI process.

Considering that the EU was about to enter an economic crisis, and that Germany itself to a large extent depended on import of metals for its processing industries, German politicians may have found it to be a strategic choice to keep the agreement with industry to pursue the strategy on the European level. Touching on the same subject, the non-energy extractive industry³² as a whole provided direct employment for one million people, and four million jobs in the downstream industries, and consequently contributed a pivotal value of the EU's domestic product (University of Leoben 2004).³³ In this regard, German politicians may arguably have felt that it made sense to meet the interests of industry. It had also become their interests. This may also explain why the Council made few guidelines as to what type of approach the Commission should take, despite the fact that minerals policy is the competence of member states. Another explanation may be found in the consensus made between WVM and the German government. Because the issue of raw materials was going to be addressed with a "comprehensive approach" and include the many policy areas on both the national and EU level, the German Presidency was required to follow this up.

Euromines was a member of Eurometaux and also a member of the EMIREC's technology platform. In fact the director of Euromines, Corina Hebestreit, chaired the work of this platform. Hence, the central role of Euromines is illustrated at an early point in the RMI process. Euromines represented the European metals and minerals mining industry (see appendix 5 for membership). Its membership consisted of twenty-four private companies and nineteen associations from EU-members and third countries. Euromines' main objective was to promote the industry and to maintain its relations with European institutions and it was

³² The non-energy extractive industry is often considered to have the following three sub-sectors: Construction minerals, industrial (non-construction) minerals and metalliferous minerals (University of Leoben 2004).

³³ The numbers includes downstream industries such as glass, foundries, ceramics, paper, paint, plastic, etc. They also include new member states acceding countries (University of Leoben 2012).

therefore situated near Eurometaux and the EU quarter in Brussels (Euromines 2013). Like Eurometaux, Euromines had been closely following and experiencing the gradually difficult situation to stay competitive. Thus, the association was well aware of the challenges of the mining industry inside Europe³⁴ and had the clear objective of becoming the “spokesperson” of the sector (Hebestreit 2014). Importantly, people in Euromines knew they wanted a communication. As Hebestreit (2014) states: “We had to look at what the Commission could do. What were the options? You look at the tools they have, you pick the one you want and you try to push that one”.

In order to secure the interests of its members, Euromines turned to the Commission in order to present the need to develop a policy to secure future access to raw materials (Hebestreit 2014). Interestingly, in the very beginning of the work on raw materials, some Commission officials in the lower hierarchic structures considered that the issue of raw materials would not appear to be important enough. In order to highlight the importance of access to raw materials, it was therefore suggested to refer to “critical raw materials”, a term that would later be used on those raw materials that were considered to be the most important for the competitiveness of the European metals and mining industries (Hebestreit 2014).³⁵ This term also signaled that the Initiative did not show concern towards strategic raw materials in particular, but more importantly those raw materials that were considered critical for the European economy (Hebestreit 2014). More generally, another aspect that helps to explain the role and impact of industry is the fact that there was continuity within the Commission that made it possible to develop a proper contact between the officials in DG Enterprise and the industry representatives (Hebestreit 2014). The relevant Commission officials had been in their jobs for several years. They had experienced the accidents in Spain and Romania, written updates on the situation for industry, seen the economic rise of China and thus seen how the industry faced increasing competition (Hebestreit 2014). Industry found itself in a position where the conditions were suitable to promote the RMI.

³⁴ Amongst others, this was due to competition in land use and regulations that hindered exploring and distracting activities (European Commission 2008).

³⁵ See chapter three.

2.2 The Commission and the preparing of the RMI

What happened after the Competition Council requested the Commission to develop “a coherent approach with regard to raw materials” (Council of the European Union 2007)? When the Council encourages the consideration of particular policy developments the Commission is given a political incentive to initiate new policy and ensure its implementation. The Commission thus plays a central role in the EUs political process (Egeberg in Cini and Borragán 2013).³⁶

As illustrated in the previous sections, the awareness about the challenging situation for European industry had been growing inside the Commission for several years. People in the DG Enterprise had been leading the earlier work on policy making for the metals and mining industry (Hebestreit 2014). Thus, contact was already established and had time to develop in the years prior to the Council’s request. Only two weeks after the Council Conclusions were launched a staff working document was published. *Analysis of the competitiveness of the non-energy extractive industry in the EU* identified challenges regarding the situation on raw materials for European industry (European Commission 2007). Where did the staff working document come from? The answer may be found by looking to the Raw Materials Supply Group (RMSG). This group was created in the mid-1970s as a result of the growing concern of the future access to raw materials due to the protectionism of third countries and the following rise in raw materials prices (European Commission 1975). However, the RMSG was poorly used until 2006 when the issue of access to raw materials reappeared on the European agenda (Anciaux 2014). The group had an informal character and consisted of different actors with in-depth knowledge and responsibility in areas related to the competitiveness of the non-energy extractive industries and environmental issues (Anciaux 2014). As table 2.1 shows the group was dominated by industry and national geological surveys.

³⁶ When a policy proposal is launched it is on behalf of the whole Commission, but one DG often has the lead in terms of collecting the necessary information and involving relevant DGs and actors. In the RMI process, DG Enterprise was given the lead to develop an approach with regard to raw materials

Table 2.1 Membership of the Commission’s Raw Materials Supply Group

Type of membership	Number
<u>Non-state actors</u>	
Industry associations	19
Research Institutes	6
Academia	2
NGOs	5
Trade Unions	3
<u>Total organizations</u>	<u>32</u>
<u>National Administrations</u>	<u>46</u>

Source: European Commission (2013a).

In the RMI process the RMSG assisted the DG Enterprise in the preparation of policy definitions. A central element here was that it provided expertise during the drafting of the staff working document on which the first RMI is based (European Commission 2013a): This document "draws to a large extent on contributions received by members of the RMSG, in particular from representatives from the non-energy extractive industry” (European Commission 2007: 107). When conducting research in Brussels, several interviewees indicated that particular members of the Commission’s RMSG had been central in writing the staff-working document. Given the early central role of Euromines a question is whether this association wrote the document. In any case, discussions indicate that the document at least came from actors from the metals and mining industry inside the RMSG. As Bosmans (2014) argues:

It is always like that. You first have some general ideas, then you have a draft coming out and then there are different steps were you start discussing. Sometimes it is with the initial idea that you start discussing, sometimes you receive first a draft document and then you discuss the base document.

It is clear that industry had firsthand knowledge about the situation on raw materials because such information is crucial for its present and future activities, and field experts often work for industrial actors. As previously mentioned, the Commission relies on information to draw out new policy. To make this policy consistent with the actual challenges for industry, industrial actors *needed* to be included in the process. Participation also provided the Commission with the necessary legitimacy to develop the RMI. Because of these reasons industry possessed a natural status as insiders in the RMSG.

The staff-working document provided a base for future work of the Commission whose main concern at that point in the process was to “grasp the issues” (Anciaux 2014; European Commission 2007). Many discussions took place in the inter-service meetings among the

different DGs which started in October 2007.³⁷ These inter-service meetings are characterized as a “collective effort” in which representatives from the different DGs exchange views and discuss possible actions within the relevant policy areas, and the work is mainly consensus driven (Anciaux 2014). Since the Competition Council had requested to develop a *coherent* approach DG Enterprise, DG Environment, DG Trade and DG Research and Innovation took part in these early inter-service meetings. They looked at different aspects of the staff-working document and reported back to the inter-service meetings. Consequently, new concerns came in and the process started to grow (Anciaux 2014).

In addition, considering the Commission’s need for information, many stakeholders from different sectors came to hold briefs for people sitting in the lower and upper levels of the Commission hierarchy (Anciaux 2014). The main actors were Euromines, Industrial Minerals Associations Europe (IMA) and European Aggregates Association (UEPG), materials specific federations³⁸, the recycling sector and stakeholders from the downstream users such as Business Europe (Anciaux 2014).

At the same time, the original agenda-setters were still determined to pursue their original objectives. Hebestreit (2014) describes how they worked non-stop towards the Commission:

We have always said that this can only be done by systematic work: always answer, always provide information, no lies, always straight to the point, honest – even if it is bad news. You know, keep at it. I remember very well walking into the offices one day in 2007/8 when we were preparing this. When the person in charge at that time explained to me what he was going to do I clearly said that “this is not enough”. You have to be a bit tougher and not give in with everything.

In addition to discussions inside the Commission, DG Enterprise initiated a consultation from January to March 2008 with the objective of collecting information and opinions on possible actions at the level of the EU, member states and other stakeholders (DG Enterprise and Industry 2008). The staff-working document provided the base for the questions set out in the consultation. Who responded to the consultation? Not surprisingly, seventy-two per cent of the respondents represented an organization, and of these organizations eighty-two per cent represented companies or business organizations (DG Enterprise and Industry 2008).³⁹ Figure

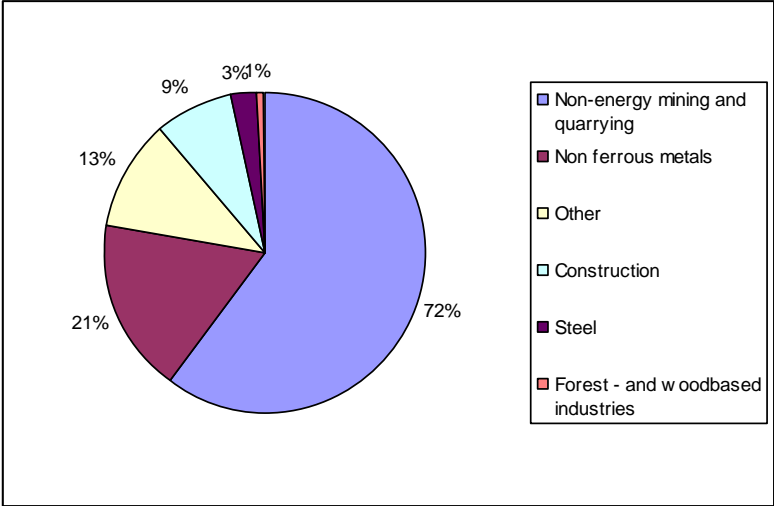
³⁷ In 2007, the Commission’s High-Level Group (HLG) on Competitiveness, Energy and the Environment, which was established to ensure a policy consistency in European policy-making, evaluated the situation on raw materials in 2007. This evaluation was also based on the staff working document (European Commission 2007; 2006).

³⁸ Such as Eurogypsum.

³⁹ While companies accounted for 57 per cent, 25 per cent came from business organizations (DG Enterprise and Industry 2008).

2.1 illustrates that a substantial majority⁴⁰ of the companies were active in the area of non-energy mining and quarrying. It also shows that a crucial share of the contributions came from the non-ferrous metals industry (DG Enterprise and Industry 2008).

Figure 2.2 Type of activities of companies responding to 2010 consultation



Source: European Commission (DG Enterprise and Industry 2008).

The findings support the argument that actors from the metals and mining industries were concerned with the question of access to raw materials. Furthermore, supporting the argument that the RMI process started were by lobbying efforts in Germany, is that the country had the largest amount of respondents. In fact, as much as twenty-five per cent of the respondents came from Germany (DG Enterprise and Industry 2008). Based on the replies from the consultation, officials in the DG Enterprise found that three main areas stood out as particularly central: to ensure supply from third countries, the need to increase raw materials supply from European sources and to encourage resource efficiency (Anciaux 2014). As a result, these elements were expressed in the RMI’s three pillars.

The chapter has accounted for the role of industry, and especially the role of Eurometaux and Euromines, which both have been driving the RMI process on the national and European level respectively. With regards to the EU’s need for legitimacy to formulate new policy, it should be noted that only European Environmental Bureau (EEB) contributed to the consultation.⁴¹

⁴⁰ In total 240 responded to the consultation (European Commission 2008c).

⁴¹ EEB is a federation consisting of over 140 environmental citizens’ organizations in over 30 countries (EEB 2014). Throughout the contribution EEB stressed that resources are limited and that the policy shouldn’t only focus on the extraction of materials, but pursue resource efficiency and a lifecycle approach to the use of raw materials. Moreover, it stresses the importance to assure policy coherence with the EU’s overall environmental policy (EEB 2008).

With this in mind, it is relevant to ask: what about the other NGOs? As the only directly elected and thus accountable to the public: where were the MEPs? The Commission had meetings with stakeholders who oppose mining and who want to close all mines. Anciaux (2014) states that even though such interests were difficult to include in the RMI, the Commission still listened to them. This may be the first indication that interest groups that have divergent interests to the EU may have to redefine their interests in order to gain influence. As Greenwood (2011) argues; groups that generally oppose the logic of market integration often find it difficult to influence the process and therefore have to re-interpret their core values (Greenwood et al. 1992). However, not all actors were aware of the RMI process at this point. As Warmenbol (2014) states: “The initiative really caught us by surprise. It seems as if the process prior to 2008 was more or less silent. If we knew about the policy process before we would have tried to influence the process earlier”. As the next chapter will show, neither of the MEPs seemed to have been well aware of the RMI process before the first Communication was launched on November 4th 2008.

This chapter has illustrated that the protagonists in the early RMI process were the European metals and mining industries and the Commission. It has shown that the German metals industry played a particular important role in setting the agenda on the European level, a finding that may well support Germany’s generally central role in the European Community. The chapter has also shown that the success of Eurometaux and Euromines is explained by several factors. First, Eurometaux and Euromines had a clear objective to access to raw materials and an equally tough strategy to achieve this. Second, both stakeholders enjoyed the privilege to possess the status as insiders in the Commission, and particularly in the DG Enterprise and the RMSG. As industry was largely dependent on a policy to secure its future activities, and that industry would be affected by an EU policy on raw materials, it was also its right to state its opinions on the matter. Therefore, from the very beginning of the RMI process, industry was a natural insider. After the RMI was launched and sent to the EP and the Council, the metal and mining industry were however not the only ones concerned with the Initiative. At this point, more actors entered the scene. As Hebestreit (2014) bluntly put it: “There is a whole range of stakeholders throwing bricks at them [the Commission] and saying “take this, take that”. The process prior to the second RMI and the EP resolution in 2011 will be outlined in the next chapter.

3. The process towards the 2011 Communication: More stakeholders, wider agenda

This chapter aims to address the thesis second sequential focus: it accounts for an outline of the political process after the RMI was published. A diversity of actors became involved in this period. Who were these interests? What were the implications of the increased number of actors involved for the metals and mining industries? Did it become more difficult for them to influence the further RMI process? And what about the newcomers: how did they get involved in the process and did they influence the RMI process at all? The chapter will show that newcomers were from particular industries, NGOs and the EP. The chapter will mainly focus on the role of development organizations, the forest industry and the role of certain MEPs – to illustrate how new elements came into the RMI process. Furthermore, the chapter will show that the informational approach can be used to understand how NGOs influenced the designing of the EP resolution, and that the coalition activity was efficient because the NGOs managed to agree on a common position, in addition to preparing the right arguments, before facing the policy makers. Despite this apparent success on influencing the RMI process however, the chapter will further show that the actual impact of NGOs and their “allies” in the EP was challenged by general structural features in the EU-system. None the least, the industry’s initial decision to address the issue of raw materials through a comprehensive approach continues to support the interests of industry. Furthermore, as the industry was already working from inside of this institution, it continued to possess a privileged position in the RMI process. This is illustrated by industry’s leading work within the criticality group and its central role in the group on best practices. It is also illustrated by the development of the trilateral cooperation with Japan and the US. None the least, industry successfully pursued its interests through the development of new projects through cooperation with particular MEPs in the EP.

3.1 Industry’s influence inside the Commission

The Communication was published and sent to the EP and the Council in November 2008 (European Commission 2008a). In May 2009 the competition ministers welcomed the RMI and encouraged the Commission, member states and stakeholders to put the strategy into action (Council of the European Union 2009). Accordingly, the Commission initiated action

to implement measures with regards to the three pillars.⁴² The Commission's RMSG established the ad-hoc group on criticality and the ad-hoc group on best practices. Both groups provided support to the Commission in the development and implementation of policy and new legislation (European Commission 2013a). The members of these groups can therefore be considered as insiders.

The ad-hoc group on criticality was an industry oriented group working to identify which raw materials were especially critical for European competitiveness.⁴³ As arguably expected, Euromines and Eurometaux, and members of the latter, were members of this group. In order to find out which raw materials were critical, the group relied on technical expertise on raw materials to design a complex mathematic formula. From the very beginning it was clear that the group's objective to identify which raw materials were critical for the competitiveness of European industry was related to access to raw materials *outside* the EU. Recalling the German industry's dependence on import and the German Presidency's concerns to target China's restrictive measures which were reflected in the Council Conclusions, the criticality group can be seen as the concrete answer to implement this point (first pillar).⁴⁴ While there were several criteria that *could* be used to define criticality, three examples reflect that the group's main concern was access to third markets. First, members of the group that were concerned with the mining conditions *inside* Europe felt misplaced. Representing the multinational family company Knauf which produces gypsum and other building materials and construction systems, Reimann (2014) was keen to address the supply risk *inside* Europe, because EU legislation⁴⁵ prevented mining companies' access to European quarries. However, neither the Commission officials, external consultants nor the most of the other stakeholders, wanted to discuss this topic. Accordingly because it was not relevant for the company to discuss metals and rare earths, Knauf got nothing out of the participation in the criticality group (Reimann 2014). On the other hand, a representative from the metals industry found herself well positioned to promote the interests of her company which origins was from an

⁴² DG Enterprise chaired the process but relied on the other DGs to develop the strategy into concrete legislation (Lawlor 2014; Anciaux 2014).

⁴³ The work was chaired by the DG Enterprise with the participation of experts and the supported by external consultants from Fraunhofer ISI and Bi Intelligence. It worked from April 2009 to June 2010. After the report was published it was subject to a public consultation up until the 15th of September 2010 (European Commission 2010b).

⁴⁴ Ensure access to raw materials from international markets under the same conditions as other industrial competitors. Using so-called "raw material diplomacy" was important (European Commission 2008a).

⁴⁵ Natura2000 (Reimann 2014; European Commission 2010c).

EU member state. The company's main concern was that particular metals would be included in the final list. Consequently, the objective of the company's representative was to "make sure that the right result was achieved" (Interviewee1 2014). Supporting the argument of Eurometaux' role in the RMI process, the company was in fact a member of this association and was thus requested to participate by Eurometaux (Interviewee1 2014). Related to environmental concerns, another example shows that while the industry provided much information that could be used to define criticality, information from the environmental angle was less extensive but *could* nevertheless be used (Bosmans 2014). Obviously, to include environmental concerns was a particular issue of DG Environment which mission was to "Protecting, preserving and improving the environment for present and future generations" (DG Environment 2002). The result of the negotiations were however, that the mathematic formula only took into account *access* and not *recourse efficiency* – even though the latter was relevant for the RMI's third pillar. The reason why resource efficiency was not included in the method was a fear among some of the members that the group would come up with an environmental indicator that would be too strong and thereby bring them far away from the initial objective which was to show which raw materials were important for the competitiveness of the European industry (Anciaux 2014).⁴⁶

So far the chapter has illustrated that the membership of the criticality group was dominated by industrial stakeholders. Given that the RMI affected many policy areas, other actors such as development and environmental NGOs should have an interest in the work of the criticality group. Interestingly, Friends of the Earth (FoE) and European Environmental Bureau (EEB) were invited to participate in the criticality group but declined the invitation (Anciaux 2014). Finding clear answers to why they declined the invitation has proven difficult.⁴⁷ However, a possible explanation may be found in the character of the criticality group. Its mandate was to develop a method to define critical raw materials, and not to decide *if* raw materials should be assessed. As such, if they would decide to participate the NGOs, especially FoE which profoundly disagree with the objectives of the RMI, may have felt that they had little to do in the group, and that they would have had poor bargaining power. As Bosmans (2014) argues: "The Commission is looking for new ideas and perspectives to gain the necessary legitimacy

⁴⁶ Focusing on industry's interest to access raw materials in third markets, the criteria used to define "criticality" were closely related to the political and economic stability in producing third countries, the level of concentration of production and the potential for substitution and the recycling rate (European Commission 2010b).

⁴⁷ Several efforts were made to talk to representatives from Friends of the Earth and EEB, but they did not reply.

and credibility, but it is not going to change the initial objective”. Another explanation may be that lack of resources made it difficult to prioritize participation in a group with little chances of gaining influence. As Warmenbol (2014a) states: “NGOs will seek influence were they think they have the chance to achieve it”. With a clear objective to develop a list that would be used to formulate new policy, members of the criticality group were thus concerned with technical and complex discussions and the particular interest of the metal and mining industries. In July 2010 the report on critical raw materials was published.⁴⁸ Chapter four accounts for the application of the list, and shows that the list, and thus the group, was crucial in deciding concrete future actions in the RMI process.

The same month as the list of critical raw materials was launched, the report from the working group on exchanging best practices, was published. The ad-hoc group on best practices consisted of representatives from national ministries and industry who shared experiences related to mining inside Europe (European Commission 2013a). Again, illustrating the central position of the metals and mining industries, the Director of Euromines states that “there is nothing going on in Brussels on mining where I am not involved” (Hebestreit 2014). In fact, Euromines was a member of both ad-hoc groups and played an especially central role in the group on best practices. Hebestreit made many visits to both new and old member states: “I was trying to discuss with everybody. I talked to national ministries, I explained and got to understand the situation and mining problems in each country – because Sweden is not like Slovakia and vice versa” (Hebestreit 2014). Consequently, like in the criticality group, industry was represented and highlighted the need to improve the framework conditions in order to better access raw materials (European Commission 2010c).⁴⁹ Furthermore, in order to collect the views of member states, the group carried out an extensive consultation asking about different topics that were already considered as key areas in the RMI Communication.⁵⁰ Many contributions were made and the group discussed possible solutions to the challenges that were identified. Because member states did not have proper mineral policies the group suggested that member states should consider developing such policies (European

⁴⁸ The list included 14 out of 41 raw materials.

⁴⁹ Here, clarity, understanding about the requirements for getting a permission, and earlier involvement of “key stakeholders” were considered central to speed up authorizations procedures (European Commission 2010c).

⁵⁰ These issues concerned minerals policies, land use planning policy for minerals, authorization, achieving technical, environmental and social excellence, geological knowledge base, better networking between the national geological surveys and the need to integrate terrestrial sub-surface information into the GMES land (European Commission 2010c).

Commission 2010c).⁵¹ As described in chapter two, member states had relied on the markets to access raw materials. In this regard, the proposal to develop national minerals policies is not particularly surprising as the lack of them was one of the reasons for why industry initiated the RMI. Nevertheless, a key to establish minerals planning policies was the establishment of a robust digital geological knowledge base.⁵² The group suggested that the terminology of this information would be standardized and used to improve the EU knowledge base on minerals. This would also facilitate networking among the national geological surveys (European Commission 2010c). More generally, it was pointed to the need for research to develop solutions with regard to the management of minerals through recycling and resource efficiency. As previously mentioned, these issues were already identified in the 1970s. They were also a concern for EMIREC's technology platform. Hence, the interests of industry were well reflected in the group on best practices. Furthermore, both this group and the technology platform were actively stressing industry's research needs already before the RMI was launched (ETP SMR 2013; European Commission 2007). From 2010 the efforts were intensified as the technology platform was "really pushing hard research agendas and strategic research implementation plans" (Hebestreit 2014). Industry's efforts led to the Commission's proposal for a European Innovation Partnership (EIP) for the Competitiveness Council in a meeting in September in 2010. However, member states were skeptical to this proposal (Kefferputz 2011). Another attempt to convince member states took place during the Competitiveness Council meeting on October 11th to 12th in the same year, but member states again expressed their skepticism. Buijs and Sievers (2011) argue that member states historically have tended to safeguard their minerals resources in times when these have been particularly exposed to a larger degree of supply instability. Member states may have expressed a form of resource nationalism when faced with the proposal on EIP raw materials. However, despite the hesitation of member states, it will be further illustrated in this chapter that industry's determined lobbying resulted in a solution in the European Parliament (Kefferputz 2011).

In addition to showing the central role of industry in the two ad-hoc groups, the examples illustrate the significance of not only private companies, but their euro associations. Earlier research on euro associations has pointed to the relatively little significance of euro

⁵¹ Regarding planning policy, the group required that member states should develop distinct plans particularly for raw materials which would relate to the broader national minerals policies (European Commission 2010c).

⁵² This also would be done through the INSPIRE Directive and include information about long term demand for materials of special importance for local economy (European Commission 2010c).

associations in the EU policy-making (Richardson and Mazey 1993). However, in the RMI process their role seems to have been crucial in providing the Commission with relevant information. Also, companies were invited to participate in the ad-hoc group on defining critical raw materials *by* the euro associations of which they were members (Interviewee1 2014). Interviewee1 (2014) confirms the value of the company's membership in Eurometaux as she states that: "We rely to a large extent on what Eurometaux is doing. In the RMI process Eurometaux was in regular contact with the Commission. By that you make sure that they work in the right direction". Also, according to Hebestreit (2014), Euromines' relation to the Commission has certainly changed: "When I started fifteen years ago, not everybody knew about Euromines. Now I can walk in to the Commission anytime and say that I am from Euromines, and I will get an appointment". The statement refers to many years of lobbying efforts. In this regard, it provides supports to the argument that successful lobbying be considered as a long-term interaction with policy-makers.

In addition to establishing expert groups, the Commission pursued cooperation with the US and Japan. Following the argument of Woll (2014) that the autonomous EU institutions can seek to balance against other big powers, this cooperation may be an expression of such an attempt. Japan and the US had already developed raw materials policies. It may therefore have been considered that the EU could learn from their experiences. In fact, relying largely on import of raw materials, the Japanese government developed early an industrial policy in the postwar period (Okuno-Fujiwara 1991).⁵³ Like the EU and Japan, the US also relied heavily on import of raw materials and especially rare earths (Perry 2012). This tendency had become stronger as several mining sites in the US had been shut down and activities moved to China. Over forty per cent of commodities and rare earths needed to be imported and, as in Europe, it would take many years to start extractive activities at home. In all, the undesired dependency on import could negatively affect the US economy (Perry 2012).⁵⁴ Using the argument of Dür (2014) that industry is pursuing its interests in EU policy making, it can also be argued that because industry in the EU, Japan and the US were dependent on import of rare earths from China, it had a common interest to cooperate to reduce this dependency. This would be done by seeking to develop discussions about cooperation on the technological level. Consequently, the first EU-US-JP Trilateral Conference on Critical Materials took

⁵³ Already in 1975 a Japanese consortium obtained control of 15 per cent of the world reserves of chromium already in the 1970s (European Commission 1975).

⁵⁴ Numbers from 2012.

place in Washington in 2011 (European Commission 2013d). In line with the concerns of industry, the conference's workshops dealt with cooperation on extractive and processing activities, and cooperation on efficient use and substitutes of raw materials (European Commission 2013d).

Furthermore, after the RMI was published, many stakeholders met with the Commission in particular fora and thereby provided sector knowledge to the Commission's further work. According to Lawlor (2014) people from a range of stakeholders, including industry, member states and NGOs, gave briefs on issues that were of particular importance for them. In all, issues were discussed in the inter-service meetings which functioned as a platform for preparing and coordination of further policy that would be followed up by different DGs. In order to follow up the concerns of stakeholders, the Commission started preparing a second Communication on the RMI. With that objective in mind, DG Enterprise held a public consultation in 2010 (European Commission 2013). The questionnaire concerned questions about the work and possible future work of the Commission regarding several policy areas (European Commission 2010a). Compared to the 2008 consultation which focused mainly on the mining industry this consultation clearly concerned other industries. It concerned all industrial raw materials (European Commission 2010a).⁵⁵

157 contributions were sent to the Commission (European Commission). With few exemptions stakeholders supported the Commission's work to gain access to raw materials from global markets (first pillar) and many described trade distortive measures relevant for their respective industries. In doing so they could increase their chances of having the Commission focusing on removing these restrictions in international trade negotiations. Several contributions also stressed that the work to define critical raw materials should have broadened its approach and thereby not exclusively focus on metals. For this reason many interest groups stated the need to review and update the list of critical raw materials in shorter periods than five years. Wood and paper were identified by the several stakeholders⁵⁶

⁵⁵ Energy and food related raw materials were exempted from the consultation, but it concerned industrial raw materials such as minerals, ores, aggregates, wood, hide and skins (European Commission 2010).

⁵⁶ Finnish Forest Industries Federation (FLEGT), Italian Federation of Wood, Cork, Furniture and Furnishing Manufacturers (FEDERLEGNO-ARREDO), Confederation of European Paper Industries (CEPI), Assocarta, European Confederation of Woodworking Industries (CEI-Bois), European Organization of the Sawmill Industry (EOS), Swedish Forest Industries Federation (European Commission 2010f; 2010g; 2010h; 2010i; 2010j; 2010k; 2010l; 2010m).

representing the forest and paper industries and Business Europe (European Commission 2010k; 2010l; 2010p).⁵⁷

Another element related to the first pillar was the question of policy coherence for development (PCD) which was described by a broad range of NGOs. These organizations highlighted aspects like the right of third countries to decide restriction, exploitation and export of raw materials, and that the EU should work towards challenging current production and consumption patterns. According to some, this could best be done by stopping the mining sectors from carrying out their extractive activities (European Commission 2010q). As the RMI was an initiative to strengthen the conditions for mining companies inside and outside Europe, it is obvious that the Commission would not completely change the RMI or stop working on the Strategy. These interests of NGOs are therefore not relevant for the second RMI. Instead, their concern about updating the Extractive Industries Transparency Initiative (EITI), a standard constituting requirements and guidance on mining sector's reporting, was relevant. By proposing that companies at least should meet some minimum standards, the NGOs sought influence within the premises that had already been decided upon (mining activity). A pivotal part of the strengthening of the EITI was the claim of NGOs to make it compulsory for companies, and not voluntary. Chapter four will account for how the Commission responded to the contributions of the 2010 consultation, but the following section first pays a visit to the European Parliament. How was the process of the RMI inside this institution? The next section accounts for an outline and discussion on this question. It will show that while NGOs certainly influenced the process inside the EP, industry was again in the fore benefiting from good relations and seeing their interests being safeguarded.

3.2 The European Parliament awakes

Despite the fact that the RMI was sent to the EP when it was launched in 2008, the Initiative was first discovered by chance during a research on rare earths, in the office of MEP Reinhard Bütikofer, in 2009. In fact, the discovery was at a time when the issue of resource security gained more political prominence in the context of the dispute surrounding Chinese rare earths (Kefferputz 2014). Bütikofer belonged to the political party Greens/EFA, which

⁵⁷ Additionally, cotton was identified as critical by the European Apparel and Textile Confederation (EURATEX). Ceramic was identified by the European Confederation of Iron and Steel Industries (EUROFER). (European Commission 2010n; 2010o).

worked for “economic and social reforms to make development sustainable for both human beings and the natural world” (Greens/EFA 2014).⁵⁸ Bütikofer was also a member of the Committee on Industry, Research and Energy (ITRE) which “define policies and legislative framework aimed at a better and more competitive Europe” (ITRE 2014a). When the RMI was discovered, Bütikofer’s first reaction was to contribute to the Commission’s 2010 public consultation. Here, Bütikofer referred to the method approach to define criticality as being too limited and that a more correct picture of the situation could have been achieved if other factors were applied. Apart from this, the MEP was content with the work of the criticality group and encouraged that conventional materials, like iron ore should be taken into account (Bütikofer 2010). The choice to refer to other raw materials can be seen as a way for Bütikofer to speak as a member of the ITRE committee. One can still ask: what was the background for his opinion? There are several possible answers to this question. First, stakeholders may have provided Bütikofer with particular information in the period prior to his contribution. Second, his opinion had developed throughout the membership in the ITRE committee. Or third, given Bütikofer’s German nationality his opinion may indicate a particular concern for, and contact with, German industry. Fourth, and most likely, his contribution was a result of all these three factors. The common feature of each of them is that Bütikofer had to communicate with industry representatives because he was working on industrial matters. For industry, MEPs can thus be seen as a channel for influencing the political process. Why? Because the MEPs, like Commission officials, are dependent on information from the outside to formulate new policy.

Further, Bütikofer (2010) underlined that the RMI touched upon development and environmental issues and was concerned that the Commission should assure PCD⁵⁹ and not risk “overemphasizing the trade dimension”. Hence, the MEP also sought to account for the interests of his political party and the concerns of NGOs. The broad concern taken by Bütikofer is a good picture of his contact with very different stakeholders that, to a great extent, have conflicting interests. As a democratically elected MEP he was a broker of interests that sought legitimacy for his political actions by inviting stakeholders into the political process. This will be further illustrated in the following sections.

⁵⁸ The Greens/EFA is the fourth largest political party in the EU.

⁵⁹ Policy coherence for development.

Another of Bütikofer's responses to the RMI was his initiation for a *motion for a European Parliament resolution on an effective raw materials strategy for Europe* (European Parliament 2014b). Only a few weeks after he was appointed rapporteur by the Council of Presidents, Bütikofer contacted several interest groups to prepare the resolution. One of these organizations was Concord, a non-profit organization consisting 27 national associations and 17 international networks (Concord 2013).⁶⁰ It works to ensure that the EU and member states commit to comprehensive and coherent policies towards developing countries. Regarding the RMI, Concord did not agree on the proposed actions to make developing countries remove their export restrictions and considered that the RMI was not in line with the development policy of the EU (Warmenbol 2014a). Thus, to prepare their contribution to the EP resolution Concord gathered several NGOs to a NGO network (Warmenbol 2014a). The gathering of these NGOs started with a seminar during the European Development Days in October 2010 (Warmenbol 2014a). After their first meeting, the NGOs met two-three times a year to discuss issues related to trade with developing countries (Warmenbol 2014a).

The NGO network stayed in contact with Bütikofer throughout the whole process of writing the EP resolution.⁶¹ Each amendment they made was followed by a justification. Arguably, in line with their interests, the NGO network thus provided amendments related to the corporate social responsibility (CSR) of European companies and proposed to make a reference to the Commission Communication on PCD⁶² (Warmenbol 2014b). One of the network's important amendments was the strengthening of the EITI.⁶³ Another of the networks amendments was the proposal that the Commission should require due diligence⁶⁴ in order to avoid fuelling regional conflicts. Importantly, a key for strengthening both the EITI and the due diligence was to make them compulsory for companies instead of voluntary. In total, the network made sixteen proposals. What was the result of the collective efforts made by the NGO network? Five amendments were directly implemented in the final report that was adopted by the EP in the first hearing on September 13th in 2011 (European Parliament 2014c). Six proposals were

⁶⁰ Accordingly, Concord represented over 1 800 NGOs. These are numbers from 2014.

⁶¹ Through meetings/briefings, phone and e-mail correspondence (Warmenbol 2014a).

⁶² Policy coherence or development.

⁶³ The Extractive Industries Transparency Initiative.

⁶⁴ Parts of the amendment "...calls on the Commission to follow sections 1502 and 1504 of the US Dodd-Frank Act concerning conflict minerals which require due diligence regarding the source of conflict minerals and their linkages to armed groups in the Great Lakes Region" (Warmenbol 2014b).

further adjusted and partly reflected in the report.⁶⁵ Thus, eleven out of sixteen proposals were implemented or at least reflected in the final report of the EP.⁶⁶ In one of the final communications with the NGO network, Bütikofer warmly thanked for their “many constructive suggestions” (Warmenbol 2014b). He further stated that the suggestions “have helped us to take into account new points and have undoubtedly helped put the report on an even stronger footing” (Warmenbol 2014b). Bütikofer also wrote that he was looking forward to continue the cooperation.

Taking into account the influence on the EP report and Bütikofer’s friendly tone, the NGOs collective effort is considered a success. How did the network obtain these results? To answer this it can be useful to recall the importance of getting relevant information and also, the significance of common interests. One of the results of the lobbying towards the EP was that the NGO network managed to get a draft document of the second RMI. This facilitated the preparation of their amendments to the EP resolution (Warmenbol 2014a). Thus, access to unpublished documents can be useful and heighten the chances of gaining influence because it gets easier for stakeholders to know the actual policy situation. This can be especially helpful when several processes happen at the same time, which was certainly the case in the RMI process. In fact, several informants considered that the most challenging in the process was to stay updated on what was happening (Kefferputz 2014; Hebestreit 2014). Furthermore, Warmenbol (2014a) explains the significance of common interests to get hold of such policy documents: “If you share the same concerns and you have the same interests – if you work towards the same objective, then of course you will share relevant information”. The statement does make sense as the actors are dependent on each other to formulate a policy that is coherent with their common concerns. The cooperation between the MEP and the NGO network may thus be seen as being built on inter-dependence. Additionally, because the NGO network provided relevant information, it was rewarded with continued access to policy-makers. Hence, they gained an insider status that made it easier to influence the RMI process inside the EP. Taking into account that the network represented many organizations and thus signaled a broad public support, Bütikofer may also have wanted to account for their interests to gain support in future elections.

⁶⁵ Six proposals were not included because they would mean a repetition of proposals already existing in the report, because they were too long, because of disagreements or because the proposal was not relevant because they fell within the competences of member states due to the subsidiarity principle (Warmenbol 2014b).

⁶⁶ These proposals concerned PCD. The final report refer to the issue of conflict minerals, but not directly to due diligence (European Parliament 2014c; Warmenbol 2014b).

Following the success to influence the EP resolution two inter-related questions arise. First, did the NGOs and other actors that made their efforts to influence the EP resolution really influence the RMI at all? And secondly, did industry lose its position as privileged insiders in the RMI process when more stakeholders got involved in the political process? The answer to the latter question is that the metals and mining industries had a carefully considered strategy from the beginning of this process⁶⁷ and therefore kept the position as a privileged insiders. So far this has been illustrated by the working of the RMSGs two ad-hoc groups. With regard to the first question however, stakeholders gained little influence through their efforts on the EP resolution because it only *stated the EP's opinion* on the RMI.⁶⁸ In fact, the Commission was not required to take into account the recommendations in the resolution as it was an own-initiative report that had no legal ramifications (Kefferputz 2014). What the Commission normally does in such cases is to read the paragraphs and identify which elements are worth pursuing (Kefferputz 2014). In the RMI process, the consequence of this was that the Commission to a large degree was able to choose what they found the most interesting. The previous sections have sought to illustrate the broker of interests. Bütikofer, and other MEPs, met with a broad range of stakeholders that all wanted to have a saying on the issue that concerned them. These interests were therefore accounted for in the EP resolution. The consequence however was that the resolution included so many elements that it did not have a focus (Kefferputz 2014). According to Merkies (2014) the implication of this is that the EP gives the Commission a political opening that the Parliament does in fact not want to give it. Further, pointing to an apparently generable feature of the EU-system, Merkies (2014) argues that the reason why the Initiative was not discovered at an earlier point by the EP is because non-legislative reports, such as the RMI, account for two thirds of the work of MEPs. Hence, the European politicians spend most of their time to formulate contributions to such communications despite that the Commission is not obliged to pursue their interests (Merkies 2014).

Drawing on the interests of Bütikofer's political membership it has been illustrated how NGOs sought influence. Additionally, his membership in ITRE, and possibly his German nationality, was useful for the original agenda setters in the RMI process. Eurometaux was interested in establishing a certification scheme to tackle illegal waste and a European

⁶⁷ See chapter two.

⁶⁸ Rule 48 gives the EP the right to state its opinion on an issue on which it has competences on. As the RMI was covering many policy sectors, it was relevant for many committees in the EP (European Parliament 2014b).

competence network on rare earths.⁶⁹ In 2010, to promote the certification scheme Bütikofer⁷⁰ managed to get hold of a draft of the second RMI (Kefferputz 2014). Then, a study on rare earths was carried out by the Greens/EFA that proposed the same ideas.⁷¹ In late November 2010 Bütikofer held a breakfast briefing and provided people with the leak version of the second RMI and presented the two proposals (European Agenda 2010). By doing so, Bütikofer made sure that these ideas became known in the EP. Eurometaux' desire to establish a European competence on rare earths should be seen in the light of the already mentioned hesitation of member states to agree on a European Innovation Partnership on raw materials. This was a situation that became frustrating for the German metals industry as China that same year again signaled that it would turn the tap on rare earths. This would make it even harder to access the crucial raw materials for the processing industry, and thereby make the need for research and innovation even more urgent. However, resource nationalism prevented the Commission follow up the proposal on EIP on raw materials. In fact, some member states even sought to hold on to their resources by pursuing their own bilateral agreements without reporting this to the Commission (Kefferputz 2011). With this backdrop, Bütikofer proposed a one million euros project on a European competence network on rare earth in the budget negotiations for 2012 (Kefferputz 2014a; European Commission 2012a). The idea behind this competence network was to identify research needs with regards to the development of substitutes for raw materials and the improvement of resource efficiency (Kefferputz 2011; 2014). As such, the competence network would meet Eurometaux' interests to promote sustainability. To gain support for the proposal,⁷² Bütikofer met with MEPs across the whole political spectrum, officials in the Commission and especially in DG Enterprise. He also invited relevant people to dinners on issues of rare earths (Kefferputz 2014).⁷³

The examples above show how industry once again successfully managed to reach its objectives. While Bütikofer sought to account for the interests of many different stakeholders, he also had a particular interest to pursue the proposals of Eurometaux because these raw materials were considered important to develop green technologies (European Commission 2008a). The signal from China to further restrict exports may have helped Eurometaux to

⁶⁹ Eurometaux had launched these ideas during the 2010 public consultation (European Commission 2010e).

⁷⁰ and his parliamentary assistant Kefferputz.

⁷¹ The study was published by the Greens/EFA (Öko-Institute e.V and the Greens /EFA 2011). Eurometaux had already carried out another study in cooperation with other stakeholders (Öko-Institute and Eurometaux 2010).

⁷² It was necessary to have the support of a majority of the votes in the EP for the proposal to establish the pilot project on a competence network on rare earths (Kefferputz 2014a).

⁷³ Bütikofer organized around four dinners on rare earths (Kefferputz 2014a).

obtain its results. Can there be other explanations to how the association succeeded? Kefferputz (2014a) refers to the willingness of the Commission to meet with them: “DG Enterprise is very good. They were always available for meetings and we were welcomed if we asked to participate in their workshops on the trilateral cooperation on rare earth with the US and Japan”. Regarding the easy access to the Commission, it is interesting to note that there has been an increased contact between the European Parliament and the Commission after 2009⁷⁴(Burns in Cini and Borragán 2013). A question is whether this contact and Bütikofer’s participation in the European Raw Materials Group (ERMG) in the EP can provide some answers as to how industry so successfully pursued its interests. The ERMG was founded on February 15th in 2011 and consisted of twenty-eight members from member states and the different EP committees (Koleva 2011).⁷⁵ The group helped the Commission to make the RMI *clearer* (CEO 2011; Euractive 2011). Hence, it seems natural that doing so also required contact with the Commission. In order to efficiently promote the areas of rare earths, foreign affairs, trade and recycling, the group was going to work with the European Raw Materials Club, a lobby group that represented raw material producing and processing companies (CEO 2011). Here, the significance of providing information to policy makers becomes evident. The EP group sought expertise from companies which had knowledge about the current situation third markets (Euractive 2011).⁷⁶ To make sure export restrictions were removed the group sought the direct action of international organizations and the EU institutions, instead of relying on the process of getting a resolution adopted by the EP (CEO 2011).

Based on the outline above it seems clear that the raw material group in the EP had close contact with the industrial actors. Like the RMSG in the Commission, the raw materials club in the European Parliament can be seen as a channel for influence for industry. In an interview in 2011, Florenz, one of the group’s founders, told that the group would define specific demands, formulate a strategic policy and design particular projects (Koleva 2011). Florenz further pointed to the valuable mix of experts in the ERMG that would make it possible to present industry’s challenges and assure that this information would be submitted to the relevant people in the Commission and the WTO (Koleva 2011). In this regard, it could be

⁷⁴ As previously mentioned the Lisbon Treaty of 2009 increased the informal contact between the EP and the Commission.

⁷⁵ The committee for international trade, the committee on foreign affairs, the development committee, the committee on environment (Koleva 2011).

⁷⁶ E.g. in countries like China and India, and African countries (Euractive 2011).

expected that the group was involved in the work on a European competence network and a certification scheme.

What was really the impact of this group on the RMI? Unfortunately, there is a lack of information⁷⁷ about this cooperation to draw any main conclusions on the group's significance. It has been stated that the group was an informal gathering of MEPs that organized events, but that it has not been very active (Kefferputz 2014a). Consequently, the group is claimed to have had minor importance in the RMI process (Kefferputz 2014b). Despite the lack of sufficient information about the actual significance of this group, it does indicate that industry have been lobbying towards the EP in order to promote their interests. Additionally, evidence shows the connection between policy makers and industry, as described on several occasions in this thesis, makes it difficult to dismiss the group as a potentially influential actor in the RMI process. Also, one could expect that not only the Commission, but also the EP would establish new groups to reduce the amount of babbling as more stakeholders joined the political process. An interesting question is then whether the ERMG can be exactly such a fora in which the original stakeholders can pursue their interests even when more stakeholders get involved in the political process.

What further supports the argument that the ERMG was established to pursue the original objective of the RMI can be found by looking at the origins of the group. In fact, the founders of the group were Paul Rübzig and Karl-Heinz Florenz who have, from the very beginning, pursued their own interests to access raw materials (CEO 2011). Both of these MEPs from the European People's Party (EPP) had a special connection with industrial actors. Accordingly, Florenz had good relations to the Austrian ceramics producer RHI AG, one of the leading companies in ERMC. In 2009 Florenz held a press conference with the RHI AG and called for a "pan-European raw materials policy" including "raw materials security as a focal point when considering new legislation" (CEO 2011: 4). Further, Rübzig, profited from Probig⁷⁸ and the Rübzig group⁷⁹ which both depended "heavily on access to cheap raw materials" (CEO 2011: 3). It is also worth noting that Rübzig, and his colleague MEP Elmar Brok, the latter paid

⁷⁷ The group's full membership appears is confidential (CEO 2011).

⁷⁸ Probig produces water- and wastewater treatment systems (CEO 2011).

⁷⁹ The Rübzig group deals with engineering, forging, heat treatment and aluminum companies (CEO 2011).

by the media giant Bertelsmann,⁸⁰ were appointed shadow rapporteur on the EP resolution. The vested interests of these MEPs have received critique. Even some businesses have referred to as “too dodgy” to join due to some of the close relations between Florenz and Rübzig and the founder of the industrial club, the Austrian lobby firm Public Interest Consultants (CEO 2011: 4).⁸¹ Given the bad reputation of the EPs raw materials group, it makes sense that people who participated in it may not want to talk too much about it and downplay its role.

This chapter has shown that more stakeholders became involved in the RMI process after the RMI was launched in November 2008. From this time on many stakeholders expressed their concerns in fora with the Commission, during the 2010 public consultation and in meetings with MEPs. The chapter has shown that when these new interest groups came into the process, the original agenda setters started to put the Strategy into action. This happened in cooperation with the Commission and the EP and resulted in proposals on establishments on research networks, a certification scheme and cooperation with US and Japan. It has been illustrated that the ad-hoc group on defining critical raw materials was useful for making policy priorities with regard to access raw materials in third markets. Also, the ad-hoc group on best practices followed up on the rather old ideas to facilitate mining activity inside the EU and thereby started the coordination of information on raw materials between member states. It has been further illustrated that the ERMG in the EP may have been a strategic platform for industrial stakeholders to pursue their interests. With regard to the lobbying towards the EP it has been illustrated that MEPs may be considered a channel for influence by stakeholders. However, the chapter also made the central argument that the efforts to influence the EP resolution may not have been the most successful with regards to influencing concrete policy action. To explain this it was pointed to the original efforts by industry to make the Commission present the issue of raw materials in a communication, which thereby left the EP with no legislative powers. The next chapter presents the actual outcomes of the stakeholders’ lobbying efforts.

⁸⁰ Bertelsmann was the parent group of Arvato Services Technical Information, which sold IT services to clients in the military sector (CEO 2011).

⁸¹ The lobby organization is a “leading lobbying partner for business” and “represents economic interests more strongly and more specifically than traditional lobbying organizations”. It is represented in Brussels and Strasbourg (Public Interest Consultants 2014). It is not registered in the EU’s lobby register (European Commission 2014c).

4. Results of the lobbying efforts in the RMI process

The lobbying efforts of different stakeholders and their contact with the EU institutions have been presented in the previous chapters. It has been illustrated that industry recalled the old talks about access to raw materials and that it played the crucial role in setting the issue on the European agenda. It has also been illustrated that despite the involvement on increasingly more actors after the RMI was published, industry managed to ensure its interests were safeguarded. The previous chapters have also accounted for the role of developing NGOs and their engagement to influence the political process. However, their influence to the EP resolution was of little significance because it only stated the opinion of the EP. Currently speaking, it is 2014 and the RMI is celebrating its six years anniversary, and during its lifetime several actions have been taken to implement the strategy. What exactly came out of the RMI? Is it possible to say something about which interests have gained influence in the RMI process? This chapter accounts for the thesis' third sequential focus. It draws on the outline in the previous chapters and provides some examples of what concrete have come out of the RMI process. The chapter will show that NGOs have been taken into account in the designing of policy, but that their most precarious concerns have been abandoned at the expense of industry's interest.

4.1 Pulling the longest straw – industry's achievements

The political process of the RMI has been much concerned with securing access to raw materials from third countries by improving the international trade framework. The ad-hoc group on defining critical raw materials found that fourteen raw materials⁸² were critical for the competitiveness of the European industry. This list was used for several purposes. One central example, which illustrates the significance of this group, is that DG Trade used the list to make priorities in international negotiations on export restrictions for example in the dispute settlement of the WTO.⁸³ In cooperation with the US and Japan the EU has targeted China's export restrictions and run several cases against the country for not complying with

⁸² The following 14 raw materials were considered critical for European competitiveness: rare earths elements, antimony, beryllium, cobalt, fluorspar, gallium, germanium, graphite, indium, magnesium, niobium, platinum group metals, tantalum and tungsten (European Commission 2010b).

⁸³ The criticality list was also used at the level at the European research projects. Here, the list was used to identify which raw materials it was most important to develop substitutes for (Anciaux 2014).

international trading rules (European Commission 2013b). The first case was resolved in January 2012 and the second case followed shortly after. On March 13th in 2012 the EU targeted China's export restrictions on raw materials including seventeen rare earths (European Commission 2013b; International Business Times 2012). This was well in line with the interests of Eurometaux and the company of Interviewee1.⁸⁴ Also, more recently, China lost a trade dispute on rare earths in WTO in March 2014 (Reuters 2014). In this regard, the metals industry has surely achieved its initial objectives. The overwhelming majority of the stakeholders that supported the RMIs first pillar during the 2010 consultation can be seen as providing the EU with legitimacy to further pursuing this strategy,⁸⁵ which not only dealt with trade disciplines on export restrictions, but also bilateral negotiations. In this regard, the EU has initiated dialogues through the EUs Raw Materials Diplomacy (RMD) and has in fact established policy dialogues on raw materials with several research rich countries.⁸⁶

Further, the 2010 consultation expressed the interest of a majority of the stakeholders to regularly update the list of critical raw materials and to consider other raw materials. In line with these wishes, the second RMI stated that the list would be regularly updated. In the spring of 2014, the RMSG still met regularly to discuss issues related to raw materials for European industry.⁸⁷ In fact, a revised list on critical raw materials is due to be published in the Council Conclusion of the Greece Presidency in May 2014 (Anciaux 2014). Recalling the contributions made by the forest industries, wood are considered in this list.⁸⁸ While some stakeholders though that other factors could be used to identify the "criticality" of raw materials, the method used has remained (European Commission 2013b). That the original method is kept can be seen as safeguarding the interests of the exporting metal industry.

Recalling the Eurometaux' strategy of 2003 to create awareness and build alliances it is justified to say that industry has succeeded. With regard to building alliances it was pointed to the common concerns of Japan and the US, and consequently the beginning of the trilateral cooperation between the three actors on research particularly concerned with rare earths. The

⁸⁴ Described in chapter three.

⁸⁵ In fact, the trade strategy was reinforced in the second RMI (European Commission 2011 a).

⁸⁶ Argentine, Brazil, Chile, Mexico, Uruguay, Colombia, America, China, Japan, countries of the Union for the Mediterranean, Greenland and Russia (European Commission 2013b).

⁸⁷ The work to update the list started in 2013.

⁸⁸ The second RMI included the wood and natural rubber.

three actors still meet regularly through this trilateral cooperation. Additionally, the alliances were not only built with external countries. The workings of the ad-hoc group on best practices increased the contact and cooperation among the national geological surveys of the EU member states (see below). Further and with regards to Eurometaux' objective to create awareness: already in October 2009 the EU and OECD cooperated to hold a workshop on raw materials within the structures of the latter.⁸⁹ The aim of this workshop was to discuss and learn about the economic impacts and logic of export restrictions (OECD 2009). Activities have also been initiated in G8 and G20 in order to encourage a “global dialogue” on how to develop a framework that will ensure sustainable access to raw materials (OECD 2009). Another point can also be raised with regard to industry's objective to create awareness about the situation on raw materials. As the EU pursued access to raw materials and fostered international dialogue on this issue, media followed. Hebestreit (2014) recalls the moment when the list of critical raw materials was submitted to the news seeking journalists in Brussels. In fact some Commission officials feared that the topic would not be interesting enough, but they soon had to adapt to another situation: “Everybody was jumping up and down. Particularly the press and it had exactly the effect that the Commission people wanted. It was all over the press” (Hebestreit 2014).⁹⁰ Online newspapers and political bloggers were among those that contributed to the public debate about the RMI. In some cases the focus had a supportive character, other times it was critical – stating that the EU did not have the right to interfere with the trade and raw materials policy of weaker resource rich countries and that the policy could undermine a sustainable use of resources (Laag 2012; FoEE 2008; Küblböck 2013). The common feature of these various contributions however, is that they did raise awareness about the exiting challenges for industry to access raw materials both inside and outside the EU. With the support of Reimann (2014), interviewee1 (2014) states: “It is good that it became an issue and that people got know that there is actually such a thing as raw materials”.

Further, with regards to EU's trade policy it has been illustrated that the issue of policy coherence for development was put to the fore by developing NGOs and the EP – as soon as they became aware of the Initiative. They stressed the need of the EU to draw out a policy on

⁸⁹ This was done through the EU trade strategy which also sought to raise awareness and support awareness building in international fora such as the Organisation for Economic Co-operation and Development (OECD), G8, G20, and United Nations Conference on Trade and Development (UNCTAD) (European Commission 2013c).

⁹⁰ That it seemed like an important issue. See chapter two.

raw materials that was consistent with the development policy of the EU. Chapter three described the work of the NGO networks to influence the EP resolution. They also made lobbying efforts towards the Commission and DG Trade in particular (Warmenbol 2014a). However, the EP resolution only stated the opinion of the EP and the Commission was not obliged to follow suit.⁹¹ The question then still remains: what did their efforts really bring? As previously mentioned NGOs pointed to the necessity of improving transparency and accountability of companies in the extractive sectors.⁹² The Commission has made improvements and as a member of the EITI board it “encourages countries rich in natural resources to join the initiative” (European Commission 2013b: 11). This may be a proof that shows the interests of NGOs have been taken into account. If one takes into account the increasingly focus on corporate social responsibility, which was referred to by industrial actors in their contribution to the 2010 public consultation, it also reflects the interests of industry itself. As corporate social responsibility has received copious attention throughout the last decades, industry will benefit from showing that it cares about how their extractive activities affect the social conditions in the local communities they operate in. But however, only to the extent that they can still continue to gain profit from their mining activities: the EITI was not made compulsory as the NGOs wanted. The argument is therefore that industry drew the longest straw. This can further be explained by the fact that industry and the EU have common interests: while industry wanted access to raw materials to continue their activities, the EU was concerned with maintaining jobs and creating an economic growth in Europe.

Chapter three further described the engagement of the NGOs to avoid that European companies fuel regional conflicts. What came out of their efforts? MEP and member of the Committee on Development (DEVE), Judith Sargentini, had a central role in the further work on due diligence. The result of this work was the DEVE committee’s proposal on conflict minerals that was launched on February 19th in 2014 (Development Committee 2014). The Commission then started looking into the issue. Expectations were high as the NGOs awaited the Commission’s proposal and stressed the need to make it compulsory for European companies. On March 5th in 2014 the Commission launched the proposal for a system for supply chain due diligence based on *voluntary* participation (European Commission 2014b). Responses did not wait from many NGOs which disappointed reported that the lack of robust

⁹¹ As mentioned the EP resolution was made under rule 48.

⁹² The Joint Africa-EU Strategy, in which the EU seeks bilateral trade agreements, states the need to strengthen the Extractive Industries Transparency Initiative (EITI) (Africa EU Partnership 2010).

legislation was absent in the proposal and therefore would not improve the situation (Earthworksaction 2014; SOMO 2014). With regards to the research question, these examples lead to the following question: is it justified to say that the NGOs gained influence in the process of RMI? Based on their online responses, arguably they did not have much influence in the process at all. Taking the example of the due diligence, on the contrary, stakeholders claim that because of its limited scope it threatens to decrease the international standard on conflict minerals reporting (Earthworksaction 2014; FMS 2014; Wallström 2014). While some might argue that the Commission proposal is a proof of real influence, one should still keep in mind that the perception of the NGOs is that the EU did not sufficiently take into account their concerns. As Sargentini (2014) states: “What we wanted was a policy that focused on sustainable mining and that made sure that developing countries, that have these resources in their soil, make proper income out of that. And that has not really been taken into account”.

Concerning the examples that are put forward in this thesis, the time is not all the way ripe to fully answer the question whether NGOs and their cooperation partners inside the EP have succeeded in gaining influence in the RMI process. The Commission proposal on due diligence has to pass the EP and can therefore be changed by both the EP and the Council if consensus is reached. Considering that the EPs elections in May 2014, it will take time to finish the legislative process (FMS 2014). Hence, there may be hope for NGOs. However, based on the strong position of industry within the EU system, as described in this thesis, a prediction is that industry once again will draw the longest straw. Like in the case of the EITI, the Commission’s proposal on due diligence is unlikely to be made compulsory for European companies.

Chapter two illustrated that the European industry faced an increasingly number of challenges throughout the last decades and there was an unexploited potential for the mining industry in Europe. The ad-hoc group on best practices consisted of representatives from member states and industry which built their work on the key areas that were described in the RMI.⁹³ It sought to identify how the mining conditions could be improved by sharing information and best practices, and by proposing solutions. What happened to these proposals? From 2010 onwards several member states started developing national minerals policies with Germany being among the first countries doing so. Further, the group’s proposal to establish a

⁹³ In addition to the 2004 report from the University of Leoben (European Commission 2010c).

European knowledge base, and the Commission's proposal to establish a European Raw Materials Yearbook were well received among the stakeholders that contributed to the 2010 consultation. Consequently, as a concrete result of the RMI process, the Minerals4U project was launched in April 2014. Minerals4U consists of over sixty geoscientists and experts on raw materials. It will create a pan-European Minerals Knowledge Data Platform where national geological surveys will make available their geological data on mineral resources.⁹⁴ It will also produce a European Mineral Raw Materials Yearbook (Minerals4U 2014). Thus, Minerals4U will also provide reports that will "support robust policy making to ensure an adequate access to raw materials for the European industry sector and to de-risk dependence on imports" (Minerals4U 2014). As the Commission's project manager⁹⁵ stated: "*The potential interest of the companies in such information is clear, since this will give a complete picture of the mineral information data and products in Europe.*"

In order to promote European mining, there has also been a significant focus on research and development of new technology. At the very beginning of the outline of the raw materials process the establishment of the informal network EMIREC was described as a response to seek to meet the challenges that industry faced. It was further pointed to EMIREC's establishment of the technology platform which was officially recognized by the Commission in September 2008. In 2012 the platform was launched as European Innovation Partnership on raw materials (European Commission 2012b). The EIP on raw materials is considered to contribute to the progress of each of the three pillars. Its objective is to push Europe to be leading in exploration, extraction, processing, recycling and substitution by 2020 (European Commission 2013b).

As previously noted however, the road towards the EIP on raw materials has been bumpy due to skeptical member states which put the Commission's proposal on ice. The assumed resource nationalism and consequently the Council's "no go" to the Commission's proposal of an EIP on raw materials, came right after China again had signaled that it would turn the tap on rare earths. This further raised the industry's concern to decrease the dependence on import (Kefferputz 2011). As mentioned in chapter three, industry found a solution within the EP. This solution was exactly expressed in Bütikofer's proposal to establish a competence

⁹⁴ The knowledge platform will make available their geological data covering mineral resources on land, down to four kilometers depth, and in the marine environment. It will also include other partners than the national geological surveys (Minerals4U 2014).

⁹⁵ He's name is Germán Esteban-Muñiz.

network on rare earths in the budget negotiations for 2012. Consequently, the European Rare Earths Competency Network (ERECON) was established in 2012 (European Commission 2013b). Hence, ERECON, and the dedicated work to realize it, should be seen as a response to the hesitation of member states to agree on EIP. Industry and their “allies” in the EU thought that the research network was important to keep up with the competition with China. ERECON was considered to possibly be included in the future EIP on raw materials (Kefferputz 2011). However, the situation as of 2014 is that they exist side by side and have become more or less integrated structures of the EU-system. Lastly but not least, chapter three pointed to the cooperation between Eurometaux and Bütikofer to promote a certification scheme. The proposal was reflected in the second RMI and the process has developed. Recalling Eurometaux’ initial concern to ensure sustainability, in the spring of 2014, DG Enterprise held a public consultation on the certification of waste treatment facilities (European Commission 2014).

This chapter has pointed to concrete examples on how the original stakeholders of the RMI have seen their interests developed into concrete policy priorities, new groups inside the Commission and cooperation with both European partners and third countries. It has also illuminated on how the concerns of NGOs have been followed up. The RMI process has shown that the many access points of industry to the European policy-making, their long experience with and connection to people within the EU’s political system, have made them well prepared to pursue their interests.

5. Conclusion: Lobbying for the Goods

The thesis has shown that the European metals – and mining industry was concerned with the vulnerable access to raw materials and that the issue was not new; the Commission addressed the issue already in 1975. As Hebestreit (2014) states “somehow we forgot about it”. Member states had paid little attention to improve mining conditions inside the EU, and China was developing as an economic power and started to restrict its export of raw materials that were critical for European metals and mining industries. It was time to take action. According to Guéguen (2008) a success criteria to gain influence in European policy-making is to present your interest as a European interest. That the situation on raw materials was the same in the whole of Europe made it possible to present the issue as a European concern. The thesis has pointed to the significant number of European jobs that directly or indirectly was affected by the EU's access to raw materials. Given that industry accounted for the employment of many people, it may not be so strange that the RMI was launched in a period in which Europe stood at the edge of an economic crisis. The need to secure people's livelihood and to create economic growth was the top priority in member states as well as in the EU. This situation and the profound interest of open markets of both the EU and the European industry created fertile conditions to promote a European initiative on raw materials.

Furthermore, the thesis has shown that industry's clear and determined strategies, exemplified with Eurometaux and Euromines, got the ball rolling to establish and develop the RMI. Eurometaux used the German government as a “tool” to set the European agenda. The Commission depended on information from industry to formulate a credible policy on raw materials. Industry knew where the shoe pinched and its information was therefore pivotal for the Commission to develop the RMI. It has been pointed to the strategic choice of Euromines to push for a communication. This made the possible future pathways multiply in number. It opened up for cooperation, projects, and the updating and adjusting of existing legislation, and did not have to follow a particular procedure (as would have been the case if it was a legislative procedure). In other words, industry's strategy invited to the individual initiatives of stakeholders. That industry had, as a provider of information, assumed a central role in the EU policy-making throughout many years already, gives support to Gullberg (2008) and Guéguen (2008) who claim that a long term interaction with decision-makers can result in successful lobbying. This is also expressed through the central position of euro associations in the RMI process.

The thesis showed that a variety of interests got involved in the process after the RMI was published in 2008. These actors all brought new concerns into the process and the policy domain became more crowded. Hence, it makes sense that the Commission established new groups in order to assure continued access to relevant information. None the least, it was required, because the EU had never carried out similar tasks before. As described, the Commission created two ad-hoc groups which each focused on access to raw materials from third countries and improving the mining conditions in the EU respectively. By doing so the Commission assured that it would continue to get relevant information to pursue the initial objective of the RMI which was to ensure sustainable access to raw materials. Seen from the side of the Eurometaux and Euromines, these associations were rewarded by maintained access to policy-making. They were arguably insiders in the political process. Like industry, the NGOs were invited to participate in the political process and were rewarded maintained access because they provided relevant information to policy-makers. These elements all fit neatly with into the theory of Broscheid and Coen (2007) which describes how interest groups obtain an insider status and thereby lobby from the inside of the European institutions. Also, recalling the technical discussions in the ad-hoc group on defining critical raw materials, and that the list was used to prioritize particular raw materials in trade negotiations, the thesis finds support to Guéguen's (2008) argument that successful lobbying tends to be technical, rather than political, in nature.

According to Mahoney (2007) groups with limited resources can maximize their achievements through cooperation with others. This can signal broad support to policy-makers and thereby increase their chances of gaining influence. It has been illustrated that the NGO network succeeded because they were efficient. However, despite the successful lobbying of NGOs, the thesis nevertheless questions whether they had an actual possibility to influence the RMI process as the RMI did not provide the European Parliament with legislative powers. Also noteworthy is that members of Parliament and most NGOs were not aware of the Initiative until quite some time after it was published by the Commission. The thesis has shown that the high number of communications published by the different DGs imply great challenges to the elected in the EP. If this situation is as extensive as it may seem, it may be reason to state that the EP suffers from a distorted power relationship, which is in favor of the Commission and commercial interests, in this case the metals and mining industries.

Did industry have it all their way? According to Woll (2012) the autonomous role and interests of the Commission determine the influence of stakeholders. It has been illustrated that the Commission did include a variety of interests in the RMI process, and the metals and mining industries had to constantly communicate its concerns. Referring to the autonomy of the Commission and the European Parliament, Hebestreit (2014) argues: “There is a partner on the other side that is usually more powerful than you. Therefore you have to permanently adjust” (Hebestreit 2014). However, the thesis has argued for the dominance of the metals and mining industries throughout the whole political process of the Raw Materials Initiative. By doing so, the thesis provides support to the argument of Dür (2012) that the business and economic interests is dominant in European policy making. By being an insider, industry succeeded in getting their goods.

Bibliography

- Africa EU Partnership (2010) 'Joint Africa EU Strategy Action Plan 2011-2013: Introductory Part'. Available at: <http://www.africa-eu-partnership.org/sites/default/files/documents/eas2007_joint_strategy_en.pdf>. [Last accessed: 06.04.2014].
- ALTER-EU (2011) 'The missing millions – how the new lobby register needs to tackle the “under-reporting” by industry lobby groups’, *Alliance for Lobbying Transparency and Ethics Regulation (ALTER-EU) Report*. Brussels, ALTER-EU. Available at: <http://www.alter-eu.org/sites/default/files/documents/under_reporting_final.pdf>, [Last accessed 22.03.2014].
- ALTER-EU (2012) 'Who’s driving the agenda at DG Enterprise and Industry?', *Alliance for Lobbying Transparency and Ethics Regulation (ALTER-EU) Report*. Brussels, ALTER-EU. Available at: <<http://www.alter-eu.org/sites/default/files/documents/DGENTR-driving.pdf>>, [Last accessed 05.11.2013].
- ALTER-EU (2014) 'Parliament issues strong call for EU lobby transparency register to become mandatory', *Alliance for Lobbying Transparency and Ethics Regulation (ALTER-EU) Report*. Brussels, ALTER-EU. Available at: <<http://www.alter-eu.org/fr/node/481>>, [Last accessed 10.05.2014].
- Anciaux, Paul (2008) 'Public Consultation on Commission Raw Materials Initiative', Background paper. *Brussels: European Commission*.
- Anciaux, Paul (2014) 'Interview about the Raw Materials Initiative', 5th of February, Brussels.
- Bosmans, Werner (2014) 'Interview about the Raw Materials Initiative', 10th of February, Brussels.
- Bouwen, Pieter (2002) 'Corporate lobbying in the European Union: the logic of access', *Journal of European Public Policy*, 9(3): 365-90.
- Broscheid, Andreas and Coen, David (2007) 'Lobbying activity and for a creation in the EU', in Coen, David (2007) *EU Lobbying: Empirical and Theoretical Studies*. New York: Routledge, pp. 14-33.
- Buijs, Bram. and Sievers, Henrike. (2011) 'Critical Thinking about Critical Minerals Assessing risks related to resource security'. Available at: <http://www.clingendaelenergy.com/inc/upload/files/Critical_thinking_critical_minerals.pdf> [Last accessed 02.05.2014].
- Bütikofer, Reinhard (2010) 'Defining Critical Raw Materials', Input from MEP R. Bütikofer on EU Raw Materials Initiative Public Consultation. Available at: <http://ec.europa.eu/enterprise/policies/raw-materials/files/pc-contributions/cit-24-butikofer-reinhard_en.pdf>, [Last accessed 13.03.2014].
- CEO (2011) 'Europe’s Resource Grab: Vested interests at work in the European Parliament', *Corporate Europe Observatory (CEO) Report*. Brussels, CEO. Available at:

- <http://corporateeurope.org/sites/default/files/publications/europes_resource_grab.pdf>, [Last accessed 14.05.2014].
- Cini, Michelle and Borragán, Pérez-Solórzano (ed.) (2013) *European Union Politics*, 4th Ed. Oxford: Oxford University Press.
- Coen, David (2007) *EU Lobbying: Empirical and Theoretical Studies*, New York: Routledge.
- Concord (2013) ‘About us’. Available at: <<http://www.concordeurope.org/about-us>>, [Last accessed 28.03.2014].
- Cooper, Richard N., and Lawrence, Robert. Z. (1976) *The 1972-75 Commodity Boom*, New Haven: Yale University press.
- Council of the European Union (2007) ‘Competitiveness. Internal Market, Industry and Research’, Press Release, 2801st Council meeting. Brussels: Council of the European Union. Available at: <http://www.consilium.europa.eu/ueDocs/cms_Data/docs/pressData/en/intm/94184.pdf>, [Last accessed 08.05.2014].
- Crombez, Christophe (2003) ‘The Democratic Deficit in the European Union: Much Ado about Nothing?’, *European Union Politics*, 4(1): 101-120.
- Curtis, Mark (2010) ‘The New Resource Grab—How EU Trade Policy on Raw Materials is Undermining Development’, Published by Traidcraft Exchange, Oxfam Germany, WEED, AITEC and Comhlámh.
- Development Committee (2014) ‘Report on promoting development through responsible business practices, including the role of extractive industries in developing countries’. Available at: <<http://www.europarl.europa.eu/sides/getDoc.do?pubRef=-//EP//NONSGML+REPORT+A7-2014-0132+0+DOC+PDF+V0//EN>>, [Last accessed 18.04.2014].
- DG Enterprise and Industry (2008) ‘Public consultation on future non-energy raw materials policy’. Available at: <http://ec.europa.eu/enterprise/newsroom/cf/itemdetail.cfm?item_id=1249>, [Last accessed: 08.05.2014].
- DG Environment (2002) ‘DG Environment’, Information Brochure. Available at: <http://ec.europa.eu/dgs/environment/pdf/information_brochure_en.pdf>, [Last accessed: 30.03.2014].
- Dür, Andreas (2012) ‘Why interest group dominate the EU’s foreign economic policies’, in Zimmermann, Hubert and Dür, Andreas (2012) *Key Controversies in European Integration*. London: Palgrave Macmillan, pp. 178-183.
- Earthworksaction (2014) ‘Proposed EU law will not keep conflict resources out of Europe, campaigners warn’. Available at: <http://www.earthworksaction.org/media/detail/proposed_eu_law_will_not_keep_conflict_resources_out_of_europe_campaigners#.U1D-Ufl_uSp>, [Last accessed: 18.04.2014].
- Euractive (2010) ‘Worries mount over China's “rare earth” export ban’. Available at: <<http://www.euractiv.com/sustainability/worries-grow-over-china-rare-earth-export-ban-news-495040>>, [Last accessed: 03.04.2014].

- Euractiv (2011) ‘Parliament group to dig up raw material issues’. Available at: <http://www.euractiv.com/specialreport-rawmaterials/parliament-group-dig-raw-material-news-502568>, [Last accessed: 13.01.2014].
- Eurofound (2010) ‘Representativeness of the European social partner organisations: Metal sector – Germany’. Available at: <http://www.eurofound.europa.eu/eiro/studies/tn0911017s/de0911019q.htm>, [Last accessed: 10.05.2014].
- Eurometaux (2012a) ‘Why and how became a member of Eurometaux’. Available at: <http://www.eurometaux.org/AboutEurometaux.aspx>, [Last accessed: 01.05.2014].
- Eurometaux (2012b) ‘Members by Category’. Available at: <http://www.eurometaux.eu/AboutEurometaux/MembersByCategory.aspx>, [Last accessed: 18.11.2013].
- Euromines (2013) ‘Who we are’. Available at: <http://www.euromines.org/who-we-are>, [Last accessed: 18.11.2013].
- Euromines (2014) ‘Members’. Available at: <http://www.euromines.org/members>, [Last accessed: 11.05.2014].
- European Agenda (2010) ‘EU Strategy on Raw Materials – Breakfast Briefing’. Available at: <http://www.europeanagenda.eu/events/29849.php?vor=2-2013>, [Last accessed: 04.05.2014].
- European Commission (1975) ‘The Community’s supply of raw materials’. Available at: http://aei.pitt.edu/1481/1/raw_materials_COM_75_50.pdf, [Last accessed: 02.05.2014].
- European Commission (2000) ‘Communication from the Commission Safe operation of mining activities: a follow-up to recent mining accidents’. Available at: <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=CELEX:52000DC0664:EN:HTML>, [Last accessed: 05.02.2014].
- European Commission (2006) ‘Terms of reference of the high level group on competitiveness, energy and the environment’. Available at: http://ec.europa.eu/enterprise/policies/sustainable-business/files/environment/hlg/docs/terms_mandate_hlg_en.pdf, [Last accessed: 24.03.2014].
- European Commission (2007) ‘Analysis of the competitiveness of the non-energy extractive industry in the EU’, *Commission staff working document SEC (2007) 771*. Available at: http://ec.europa.eu/enterprise/sectors/metals-minerals/files/sec_2007_771_en.pdf, [Last accessed: 05.12.2013].
- European Commission (2008a) ‘The raw materials initiative—meeting our critical needs for growth and jobs in Europe’, *COM (2008), 699*. Available at: <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=COM:2008:0699:FIN:EN:PDF>, [Last accessed: 11.05.2014].

- European Commission (2008b) ‘The European Transparency Initiative (EIT)’. Available at: <http://europa.eu/legislation_summaries/institutional_affairs/decisionmaking_process/ai0003_en.htm>, [Last accessed: 01.04.2014].
- European Commission (2008d) ‘Public Consultation on Commission Raw Materials Initiative’. Background paper. *Brussels: European Commission*.
- European Commission (2010a) ‘Public Consultation on the preparation of a new Communication on Raw Materials’. Available at: <http://ec.europa.eu/enterprise/policies/raw-materials/files/docs/questionnaire-raw-mat-pc-d_en.pdf>, [Last accessed: 13.01.2014].
- European Commission (2010b) ‘Critical raw materials for the EU’. Available at: <http://ec.europa.eu/enterprise/policies/raw-materials/files/docs/report-b_en.pdf>, [Last accessed: 20.03.2014].
- European Commission (2010c) ‘Improving framework conditions or extractive minerals for the EU: Exchanging best practices on land use planning, permitting and geological knowledge sharing’. Available at: <http://ec.europa.eu/enterprise/policies/raw-materials/files/best-practices/sust-full-report_en.pdf>, [Last accessed: 20.03.2014].
- European Commission (2010d) ‘Europe 2020 A strategy for smart, sustainable and inclusive growth’. Available at: <<http://eur-lex.europa.eu/legal-content/EN/ALL/?uri=CELEX:52010DC2020>>, [Last accessed: 08.05.2014].
- European Commission (2010e) ‘Eurometaux Replies to the Public Consultation on the preparation of a new Communication on Raw Materials’. Available at: <http://ec.europa.eu/enterprise/policies/raw-materials/files/pc-contributions/org-030-eurometaux_en.pdf>, [Last accessed: 28.01.2014].
- European Commission (2010f) ‘Euratex Replies to the Public Consultation on the preparation of a new Communication on Raw Materials’. Available at: <http://ec.europa.eu/enterprise/policies/raw-materials/files/pc-contributions/org-033-euratex_en.pdf>, [Last accessed: 07.04.2014].
- European Commission (2010g) ‘Eurofer Replies to the Public Consultation on the preparation of a new Communication on Raw Materials’. Available at: <http://ec.europa.eu/enterprise/policies/raw-materials/files/pc-contributions/org-037-eurofer_en.pdf>, [Last accessed: 07.04.2014].
- European Commission (2010h) ‘FLEGT Replies to the Public Consultation on the preparation of a new Communication on Raw Materials’. Available at: <http://ec.europa.eu/enterprise/policies/raw-materials/files/pc-contributions/org-056-finnish-forest-industries-federation_en.pdf>, [Last accessed: 07.04.2014].
- European Commission (2010i) ‘FEDERLEGNO-ARREDO Replies to the Public Consultation on the preparation of a new Communication on Raw Materials’. Available at: <http://ec.europa.eu/enterprise/policies/raw-materials/files/pc-contributions/org-089-federlegno-arredo_en.pdf>, [Last accessed: 07.04.2014].

European Commission (2010j) ‘CEPI Replies to the Public Consultation on the preparation of a new Communication on Raw Materials’. Available at: <http://ec.europa.eu/enterprise/policies/raw-materials/files/pc-contributions/org-023-cepi_en.pdf>, [Last accessed: 07.04.2014].

European Commission (2010k) ‘CEI-Bois Replies to the Public Consultation on the preparation of a new Communication on Raw Materials’. Available at: <http://ec.europa.eu/enterprise/policies/raw-materials/files/pc-contributions/org-038-cei-bois_en.pdf>, [Last accessed: 07.04.2014].

European Commission (2010l) ‘EOS Replies to the Public Consultation on the preparation of a new Communication on Raw Materials’. Available at: <http://ec.europa.eu/enterprise/policies/raw-materials/files/pc-contributions/org-041-eos_en.pdf>, [Last accessed: 07.04.2014].

European Commission (2010m) ‘Swedish Forest Industries Federation Replies to the Public Consultation on the preparation of a new Communication on Raw Materials’. Available at: <http://ec.europa.eu/enterprise/policies/raw-materials/files/pc-contributions/org-098-swedish-forest-industries-federation-skogs-industrierna_en.pdf>, [Last accessed: 07.04.2014].

European Commission (2010n) ‘EURATEX Replies to the Public Consultation on the preparation of a new Communication on Raw Materials’. Available at: <http://ec.europa.eu/enterprise/policies/raw-materials/files/pc-contributions/org-033-euratex_en.pdf>, [Last accessed: 08.04.2014].

European Commission (2010o) ‘EUROFER Replies to the Public Consultation on the preparation of a new Communication on Raw Materials’. Available at: <http://ec.europa.eu/enterprise/policies/raw-materials/files/pc-contributions/org-037-eurofer_en.pdf>, [Last accessed: 08.04.2014].

European Commission (2010p) ‘Business Europe Contribution to the Public Consultation on the preparation of a new Communication on Raw Materials’. Available at: <http://ec.europa.eu/enterprise/policies/raw-materials/files/pc-contributions/org-018-businesseurope_en.pdf>, [Last accessed: 08.04.2014].

European Commission (2010q) ‘Consultation on the European Commission’s preparation of a new policy Raw Materials - A partial response from Friends of the Earth Europe’. Available at: <http://ec.europa.eu/enterprise/policies/raw-materials/files/pc-contributions/org-045-friends-of-the-earth-europe-foee_en.pdf>, [Last accessed: 13.05.2014].

European Commission (2011a) ‘Tackling the challenges in commodity markets and on raw materials’, Brussels: European Commission. Available at: <<http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=COM:2011:0025:FIN:en:PDF>>, [Last accessed: 08.05.2014].

European Commission (2011b) ‘Roadmap to a Resource Efficient Europe’, Brussels European Commission. Available at: <<http://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=CELEX:52011DC0571&from=EN>>, [Last accessed: 08.05.2014].

European Commission (2012a) ‘First Commission interim report on the implementation of Pilot Projects and Preparatory Actions 2012’. Available at: <http://www.europarl.europa.eu/meetdocs/2009_2014/documents/budg/dv/2013_com_first_interim_report_/2013_com_first_interim_report_en.pdf>, [Last accessed: 01.04.2014].

European Commission (2012b) ‘Innovation partnership to overcome Europe's raw materials shortages’. Available at: <http://europa.eu/rapid/press-release_MEMO-12-144_en.htm>, [Last accessed 03.04.2014].

European Commission (2013a) ‘Register of Commission expert groups and other similar entities’. Available at: <<http://ec.europa.eu/transparency/regexpert/index.cfm?do=groupDetail.groupDetail&groupID=1353>>, [Last accessed: 05.12.2013].

European Commission (2013b) ‘On the Implementation of the Raw Materials Initiative’. Available at: <<http://eurlex.europa.eu/LexUriServ/LexUriServ.do?uri=COM:2013:0442:FIN:EN:PDF>>, [Last accessed: 12.05.2014].

European Commission (2013c) ‘International aspects’. Available at: <http://ec.europa.eu/enterprise/policies/raw-materials/international-aspects/index_en.htm>, [Last accessed: 01.04.2014].

European Commission (2013d) ‘Conclusions of the Third EU-US-JP Conference on Critical Materials’. Available at: <http://ec.europa.eu/research/industrial_technologies/pdf/trilateral-conclusions_en.pdf>, [Last accessed: 11.05.2014].

European Commission (2014a) ‘Consultation on certification for waste treatment facilities’. Available at: <http://ec.europa.eu/enterprise/policies/raw-materials/files/docs/questionnaire-w_en.pdf>, [Last accessed: 01.04.2014].

European Commission (2014b) ‘A proposal for setting up a Union system for supply chain due diligence self-certification of responsible importers of tin, tantalum and tungsten, their ores, and gold originating in conflict affected and high risk areas’. Available at: <http://trade.ec.europa.eu/doclib/docs/2014/march/tradoc_152227.pdf>, [Last accessed: 18.04.2014].

European Commission (2014c) ‘Transparency register Alphabetic list of registrants’. Available at: <<http://ec.europa.eu/transparencyregister/public/consultation/listlobbyists.do?letter=P&d-7641134-p=5&alphabetName=LatinAlphabet>>, [Last accessed: 09.05.2014].

European Environmental Bureau (2008) ‘EEB longer response to the DG Enterprise consultation of the Raw Materials Initiative’. Available at: <http://ec.europa.eu/enterprise/newsroom/cf/_getdocument.cfm?doc_id=4599>, [Last accessed: 15.01.2014].

EEB (2014) ‘About EEB’, *European Environmental Bureau*. Available at: <<http://www.eeb.org/index.cfm/about-eeb/>>, [Last accessed: 02.05.2014].

European Parliament (2011) ‘Backing for EP/Commission joint register of lobbyists and other interest groups’. Available at: <<http://www.europarl.europa.eu/news/en/news->

room/content/20110418IPR18100/html/Backing-for-EPCCommission-joint-register-of-lobbyists-and-other-interest-groups>, [Last accessed: 10.05.2014].

European Parliament (2014b) ‘Rules of procedure in the European Parliament. Rule 48: Own-initiative reports’. Available at: <<http://www.europarl.europa.eu/sides/getDoc.do?pubRef=-//EP//TEXT+RULES-EP+20140310+RULE-048+DOC+XML+V0//EN&language=EN&navigationBar=YES>>, [Last accessed: 28.03.2014].

European Parliament (2014c) ‘European Parliament resolution of 13 September 2011 on an effective raw materials strategy for Europe’. Available at: <<http://www.europarl.europa.eu/sides/getDoc.do?type=TA&language=EN&reference=P7-TA-2011-364>>, [Last accessed: 28.03.2014].

ETP SMR (2007) ‘Strategic Research Agenda Revision 1 Version’, *European Technology Platform on Sustainable Mineral Resources*.

ETP SMR (2013) ‘Strategic Research and Innovation Agenda (Strategic Innovation and Technology Roadmap) Revision 2013’, *European Technology Platform on Sustainable Mineral Resources*. Available at: <http://etpsmr.egsmigration.info/images/downloads/sria_2013_v3.1.pdf>, [Last accessed: 25.03.2014].

Federal Ministry of Economics and Technology (2010) ‘The German Government’s raw materials strategy’. Available at: <<http://www.bmwi.de/English/Redaktion/Pdf/raw-materials-strategy,property=pdf,bereich=bmwi2012,sprache=en,rwb=true.pdf>>, [Last accessed: 25.03.2014].

Fielder, Nicola (2000) ‘The origins of the Single Market’, in Volker Bornschier (ed.) *State-Building in Europe: The Revitalization of Western European Integration*, Cambridge: Cambridge University Press, pp. 75-92.

FMS (2014) ‘EU proposal on conflict minerals disappointing’. Available at: <http://www.foundationmaxvanderstoel.nl/nieuws/nieuws_item/t/eu_proposal_on_conflict_minerals_dissappointing>, [Last accessed: 18.04.2014].

FoEE (2008) ‘EU raw materials initiative: Industry interests undermine sustainable resource use’, Friends of the Earth Europe 8 November 2008. Available at: <https://www.foeeurope.org/press/2008/Nov05_EU_raw_materials_initiative_industry_interests_undermine_sustainable_resource_use.html>, [Last accessed: 13.05.2014].

German Business Portal (2014) ‘Metal & Metal Processing’. Available at: <<http://www.ixpos.de/IXPOS/Navigation/EN/Your-business-in-germany/Business-sectors/metal-and-metal-processing.html>>, [Last accessed: 10.05.2014].

German Federal Government (2007) ‘Europe – succeeding together’, *Presidency Programme*. Available at: <http://www.eu2007.de/includes/Downloads/Praesidentschaftsprogramm/EU_Presidency_Programme_final.pdf>, [Last accessed: 05.12.2013].

- Gislev, Magnus (2014) 'Interview about the Raw Materials Initiative', 5th of February, Brussels.
- Greens/EFA (2014) 'Who we are'. Available at: <<http://www.greens-efa.eu/about-us/48-who-we-are.html>>, [Last accessed: 28.03.2014].
- Greenwood, Justin, Grote, Jürge. R., and Ronit, Karten (1992) *Organized interests and the European Community*, London: Sage.
- Greenwood, Justin (2011) *Interest representation in the European Union*, 3rd Ed. London: Palgrave Macmillan.
- Guéguen, Daniel (2008) *European Lobbying*, 3rd Ed. London: John Harper Publishing.
- Gullberg, Anne Therese (2008) *Strategy counts, resources decide: Lobbying European Union climate policy*, PhD thesis, University of Oslo: Department of Political Science.
- Hebestreit, Corina (2014) 'Interview about the Raw Materials Initiative', 4th of February, Brussels.
- International Business Times (2012) 'US, EU, Japan File WTO Complaint Against China Over Rare Earth Exports', 13th of March. Available at: <<http://www.ibtimes.com/us-eu-japan-file-wto-complaint-against-china-over-rare-earth-exports-424338>>, [Last accessed: 13.05.2014].
- International Policy Digest (2012) 'China's Rare Earth Export Restrictions', 15th of August. Available at: <<http://www.internationalpolicydigest.org/2012/08/15/chinas-rare-earth-export-restrictions/>>, [Last accessed: 14.05.2014].
- Interviewee1 (2014) 'Phone interview about the Raw Materials Initiative', 30th of January.
- ITRE (2014a) 'Parliamentary Committees. Industry, Research and Energy', *Committee on Industry, Research and Energy (ITRE)*. Available at: <<http://www.europarl.europa.eu/committees/en/itre/home.html>>, [Last accessed: 28.03.2014].
- Kefferputz, Roderick (2011) 'Time for a common European Effort on Raw Materials' *CEPS Policy Brief No. 261*. Available at: <http://aei.pitt.edu/33179/1/Policy_Brief_No_261_RK_on_Rare_Earth_II.pdf>, [Last accessed: 01.04.2014].
- Kefferputz, Roderick (2014a) 'Interview about the Raw Materials Initiative', 11th of February, Brussels.
- Kefferputz, Roderick (2014b) 'E-mail correspondence', 28th of March.
- Knauf (2010) 'Knauf homepage'. Available at: <<http://www.knauf.com/www/en/ueber-knauf/ueber-knauf.html>>, [Last accessed: 17.11.2013].
- Koleva, Maria (2011) 'EU must develop raw material diplomacy', *Europost* 4th of March. Available at: <<http://europost.info/interview/eu-must-develop-raw-material-diplomacy/>>, [Last accessed: 28.03.2014].

- Küblböck, Karin (2013) 'The EU raw materials initiative: Scope and critical assessment', *Briefing paper 8*. Vienna: Österreichische Forschungsstiftung Für Internationale Entwicklung (ÖFSE). Available at: <http://www.oefse.at/Downloads/publikationen/eu_raw_materials_BP8.pdf>, [Last accessed: 06.04.2014].
- Laag, Benjamin (2012) 'The EU's Raw Materials Initiative may be of little benefit to the EU or to the developing countries it intends to help', the London School of Economics and Political Science 4th of July. Available at: <<http://blogs.lse.ac.uk/europpblog/2012/07/04/eu-raw-materials-initiative-developing-countries/>>, [Last accessed: 13.05.2014].
- Lambert, Tobias (2011) 'The impact of the European Union's raw materials policies on poor countries and emerging markets'. Prague Global Policy Institute – Glopolis. July 2011. Prague.
- Lawlor, Niall (2014) 'Interview about the Raw Materials Initiative', 7th of February, Brussels.
- Leech, Beth. L. (2002a) 'Asking Questions: Techniques for Semistructured Interviews', *Political Science & Politics*, 35(4): 665-668.
- Leech, Beth. L. (2002b) 'Interview Methods in Political Science', *Political Science & Politics*, 35(4): 663-664.
- Mahoney, Christine (2007) 'Networking vs. Allying', in Coen, David (ed.) *EU Lobbying: Empirical and Theoretical Studies*. New York: Routledge, pp.34-51.
- Majone, Giandomenico (1998) 'Europe's "Democratic Deficit": The Question of Standards', *European Law Journal*, 4(1): 5-28.
- Merkies, Judith (2014) 'Interview about the Raw Materials Initiative', 13th of February, Brussels.
- Minerals4U (2014) 'Press release: The first pan-European network on raw materials management'. Available at: <<http://www.minerals4eu.eu/index.php/about>>, [Last accessed: 04.05.2014].
- Oakdene Hollins and Fraunhofer ISI (2013) 'Study on Critical Raw Materials at EU Level. Final report (draft). A report for DG Enterprise and Industry'.
- OECD (2009) 'The OECD Workshop on Raw Materials. Economic impacts and policy objectives of export restrictions', Organisation for Economic Co-operation and Development (OECD). Available at: <<http://www.oecd.org/tad/ntm/theoecdworkshoponrawmaterials.htm>>, [Last accessed: 06.04.2014].
- Okuno-Fujiwara, Masahiro (1991) 'Industrial Policy in Japan: A Political Economy View', in Krugman, Paul (ed.) *Trade with Japan: Has the Door Opened Wider?*, Chicago: University of Chicago Press, pp. 271-304.
- Perry, Mark. J. (2012) 'Dangerous dependence: US increasingly beholden to imported raw material'. Available at: <<http://www.aei.org/article/energy-and-the-environment/natural-resources/dangerous-dependence-us-increasingly-beholden-to-imported-raw-material/>>, [Last accessed: 11.05.2014].

- Public Interest Consultants (2014) ‘The lobbying agency public interests’, Available at: <<http://www.publicinterest.at/jart/prj3/publicinterest/main.jart?rel=en&content-id=1239028364458&reserve-mode=active>>, [Last accessed: 09.05.2014].
- Reimann, Matthias (2014) ‘Interview about the Raw Materials Initiative’, 13th of February, Brussels.
- Reuters (2014) ‘China loses trade dispute over rare earth exports’, 26th of March. Available at: <<http://www.reuters.com/article/2014/03/26/us-china-wto-rareearths-idUSBREA2P0ZK20140326>>, [Last accessed: 13.05.2014].
- Richardson, Jeremy, and Mazey, Sonia (1993) *Lobbying in the European Community*, Oxford: Oxford University Press.
- Rosenau-Tornow, Dirk., Buchholz, Peter., Riemann, Axel. and Wagner, Markus. (2009) ‘Assessing the long-term supply risks for mineral raw materials—a combined evaluation of past and future trends’. Available at: <<http://www.sciencedirect.com/science/article/pii/S030142070900035X>>, [Last accessed: 08.05.2014].
- Sargentini, Judith (2014) ‘Phone interview about the Raw Materials Initiative’, 27th of January.
- Shore, Cris (2000) *Building Europe. The Cultural Politics of European Integration*, London: Routledge.
- SOMO (2014) ‘Proposed EU law will not keep conflict resources out of Europe, campaigners warn’. Available at: <<http://somo.nl/news-en/proposed-eu-law-will-not-keep-conflict-resources-out-of-europe-campaigners-warn>>, [Last accessed: 18.04.2014].
- Stahl, Anna Katharina (2011) ‘The EU Policy Response to China’s Resource Diplomacy in Africa’, *EU-China Observer Issue 4*, Brugge: College of Europe.
- Svendsen, Gert Tinggaard (2008) *Lobbyisme i EU*, Frederiksberg: Forlaget Samfundslitteratur.
- Thull, Andreas (2013) *The European raw material policy towards Africa in the context of China's Africa ambitions’ policy analysis from 1990-2013*, Bachelor thesis, The Netherlands: University of Twente, Enschede. Available at: <http://essay.utwente.nl/63476/1/Final_Vesion_Bachelor_Thesis_Andreas_Thull.pdf>. [Last accessed: 15.01.2014].
- TFEU (2010) ‘Treaty on the Functioning of the European Union’. Available at: <<http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:C:2010:083:0047:0200:en:PDF>>, [Last accessed: 08.05.2014].
- Tiess, Guenter (2010) ‘Minerals policy in Europe: Some recent developments’. Available at: <<http://www.sciencedirect.com/science/article/pii/S0301420710000255>>, [Last accessed: 08.05.2014].

- University of Leoben (2004) 'Minerals planning policies and supply practices in Europe'. Available at: <http://ec.europa.eu/enterprise/policies/raw-materials/files/best-practices/leoben_extsum_en.pdf>, [Available at: 02.05.2014].
- Wallstöm, Margot (2014) 'How to strengthen the EU's conflict minerals proposals'. Available at: <<http://www.ihrb.org/commentary/board/how-to-strengthen-the-eus-conflict-mineralsproposals.html>>, [Last accessed: 18.04.2014].
- Warmenbol, Koen (2014a) 'Interview about the Raw Materials Initiative', 10th of February 2014, Brussels.
- Warmenbol, Koen (2014b) 'Communication between Bütikofer and the Warmenbol about the work on the EP resolution, and draft of the resolution', Received on e-mail 10.02.2014.
- Woll, Cornelia (2012) 'EU foreign economic policy: the autonomy of EU institutions', in Zimmermann, Hubert and Dür, Andreas (2012) *Key Controversies in European Integration*. London: Palgrave Macmillan, pp. 184-189.
- WVM (2014) 'Die WVM'. *German metal industry federation Wirtschaftsvereinigung Metalle*. Available at: <http://www.wvmetalle.de/welcome.asp?page_id=16&sessionid>, [Last accessed: 11.05.2014].
- Öko-Institut and Eurometaux (2010) 'Öko-Institut e.V. & Eurometaux-European Association of Metals: Eurometaux's proposals for the raw materials initiative', Darmstad/Brussels, June 2010. Available at: <http://www.resourcefever.org/publications/reports/Final%20EM_OEKO_report_RMI_2010%2006%2014-1.pdf>, [Last accessed: 28.03.2014].
- Öko-Institut e.V. and The Greens/EFA (2011) 'Study on Rare Earths and Their Recycling. Final Report for The Greens/EFA Group in the European Parliament', Darmstadt, January 2011. Available at: <<http://www.oeko.de/oekodoc/1112/2011-003-en.pdf>>, [Last accessed: 28.03.2014].

Appendix 1 – Timeline of the political process of the Raw Materials Initiative (RMI)

1990s

1998 dam burst in Coto Doñana National Park, Spain.

2000

Dam burst in Baia Mare, Romania.

Commission publish new legislation → affected the competitiveness of European mining industry in the following years.

2003

Eurometaux creates a 2-year plan awareness and alliance building on raw materials.

2004

Enlargement, fear of “image burden”.

2005

Industry’s wakeup call: Future access not guaranteed

German industry federation (GDI) established a task force on raw materials to formulate a national supply concept.

Euromines turns to the Commission to present the situation.

European Mineral Research Council (EMIREC) is created.

March EMIREC set up the European Technology Platform on Sustainable Mineral Resources (ETP SMR) to work on raw materials issues.

2006

Reactivation of the Commissions Raw Materials Supply Group (RMSG).

September 2008 ETP SMR is officially recognized by the Commission.

2007

GDI, the German metal industry WVM (Eurometaux member) and the German government reach consensus on three issues: 1) access to raw materials affected all industries, 2) the

formulation of a raw materials strategy was a joint task for industry and the German state and 3) the raw materials strategy cut across all policy fields on the national and the EU level.

German government issues a national strategy on raw materials and establishes a working group with the ministries of defense and development.

21st of May Germany holds the rotating Presidency and Council of competition ministers requested the Commission to develop a coherent political approach with regard to raw materials supplies for industry including all relevant policy areas.

4th of June Commission publishes staff working document, *Analysis of the competitiveness of the non-energy extractive industry in the EU*.

6th-8th of June Germany initiates discussion on raw materials supply at the G8 Summit.

October Commission starts inter-service meetings.

2007 Commission's High-Level Group (HLG) on Competitiveness, Energy and the Environment evaluates the situation on raw materials, work based of staff working document.

2008

January – 24th of March Consultation targeted towards the non-extractive industry.

4th of November The Commission publishes the Raw Materials Initiative (RMI) (by German Industry Commissioner Günther Verheugen).

2009

28th of May Competition Council welcomes the RMI and encourages the Commission, member states and stakeholders to put the strategy into action.

Commission starts to implement the RMI and continue inter-service meetings.

Commission's Raw Materials Supply Group (RMSG) establishes two working groups.

April 2009 - June 2010 Ad-hoc group on defining critical raw materials. Report on subject to consultation until 15th of September 2010.

June 2010 Ad-hoc group on best practices published report.

Parliamentary assistant Roderick Kefferputz discovers the RMI (Reinhard Bütikofer, Greens//EFA and ITRE committee).

2010

June – September Commission holds public consultation to prepare second Communication on raw materials.

19th Sept. MEP Bütikofer contributes to the Commission's public consultation.

29th Sept. MEP Bütikofer is appointed rapporteur.
MEP Paul Rübig is appointed shadow rapporteur (EPP, ITRE).
MEP Judith Merkies is appointed shadow rapporteur (S&D, ENVI).⁹⁶
Elmar Brok is appointed shadow rapporteur (EPP, AFET).⁹⁷

October Bütikofer contacts Koen Warmenbol in the NGO Concord.

October NGOs gathers under a seminar during European Development Days in October.

→ NGO network make amendments to Bütikofer's report and lobby the EP and the Commission until September 2011.

Bütikofer and Kefferputz discover Eurometaux' analysis on rare earth which proposes:

- 1) a global recycling certification scheme to tackle illegal waste
- 2) to establish a European competence on rare earths.

Bütikofer and Kefferputz contact Eurometaux and the in a study on rare earths the Greens re-launch the idea to establish a recycling scheme.

6th of Oct. Commission *propose* European Innovation Partnership on raw materials to the Council of the European Union.

2011

2nd of February Commission launches the second RMI, *Tackling the challenges in commodity markets and on raw materials*. Wood and natural rubber included in the strategy. Commission endorses the list of the 14 critical raw materials.

2011 Budget negotiations. B and K propose a 1 million euros pilot project on a European competence network on rare earths (after/in cooperation with Eurometaux).

15th of February: The European Raw Materials Group in the EP becomes operative

20th of March: Council of the European Union endorses the reinforced RMI.

10th of March: Bütikofer published draft report.

18th of April: ITRE members publishes amendments to draft report.

31st of May to 28th of June: Committee opinions by AFET, DEVE, INTA, ENVI and AGRI.⁹⁸

25th of June: Motion for a European Parliament resolution.

⁹⁶ Committee Environmental, Public Health and Food Safety.

⁹⁷ Committee on Foreign Affairs.

⁹⁸ Committee on Agriculture and Rural Development.

13th of September The EP's resolution on an effective raw materials strategy for Europe is adopted.

7th of December: The Commission adopts its Common Position the EP resolution

2012

2012 European Rare Earths Competency Network (ERECON).

29th of February Commission adopt Communication proposing European Innovation Partnership (EIP) on raw materials. The platform behind is the ETP SMR. It becomes a part of the EUs Innovation Union.

11th of October Competition Council endorse EIP on raw materials.

November Commission finalizes a study on the feasibility on of applying a global certification scheme.

2013

2013 – May 2014 Criticality group works to the update the list of critical raw materials.

24th of June Commission reports on the implementation of the RMI.

2014

Spring DG Enterprise holds a public consultation on the certification of waste treatment facilities.

14th of May The Greece Presidency was due to publish the revised list on critical raw materials.

Appendix 2 – List of persons interviewed for the Masters’ thesis

EU institutions

EUROPEAN COMMISSION

Paul Anciaux *interview in Brussels, 05.02.2014*
Policy/desk officer in charge of raw materials and non-energy extractive industries,
Representative in the *ad-hoc group on defining critical raw materials*,
DG Enterprise and Industry

Werner Bosmans *interview in Brussels, 10.02.2014*
Policy officer on resource efficiency
Representative in the *ad-hoc group on defining critical raw materials*
DG Environment

Niall Lawlor *interview in Brussels, 07.02.2014*
Senior policy advisor
Representative in the *ad-hoc group on defining critical raw materials*
DG Enterprise and Industry

Magnus Gislev *interview in Brussels, 05.02.2014*
Policy officer on raw materials,
especially concerned with the European Innovation Partnership on raw materials
DG Enterprise and Industry

EUROPEAN PARLIAMENT

Judith Merkies *interview in Brussels, 13.02.2014*
MEP - Group of the Progressive Alliance of Socialists and Democrats
Shadow rapporteur on the *EP resolution of an effective raw materials strategy for Europe*
Member of the ITRE committee
Substitute in the ENVI committee
European Parliament

Judith Sargentini *phone interview, 27.01.2014*
MEP - Greens/European Free Alliance
Member of the LIBE committee
Substitute in the DEVE committee

Roderick Kefferputz *interview in Brussels, 11.02.2014*
Parliamentary assistant for the MEP Reinhard Bütikofer
Greens/European Free Alliance
European Parliament

Corporate interests

Corina Hebestreit *interview in Brussels, 04.02.2014*
Director of Euromines
Chair of the High Level Group of EMIREC's technology platform (ETP-SMR)
Member of the *ad-hoc group on defining critical raw materials*
Member of the *ad-hoc group on sharing best practices*

Interviewee1 *phone interview, 30.01.2014*
Head of trade affairs and export compliance (Eurometaux member)
Member of the *ad-hoc group on defining critical raw materials*

Matthias Reimann *interview in Brussels, 13.02.2014*
Geologist - Knauf Gips KG (Eurogypsum member)
Member of the *ad-hoc group on defining critical raw materials*

NGOs

Koen Warmenbol *interview in Brussels, 10.02.2014*
Coordinator of the task force raw materials - CONCORD
Policy Officer at 11.11.11

Experts from Member States

Andrew Bloodworth *interviewed via e-mail, sent 26.01. received 28.02.2014*
Science Director for Minerals and Waste - British Geological Surveys
Participated in the process up prior to the 2008 Communication was launched

Appendix 3 – Example of interview guide, Corina Hebestreit, Euromines

1/12 interview guides

Estimated time: 1 hour.

Topic/key words: Euro associations, strategies, networks,
relation to policy makers, expert groups.

Research question: What was the role of Euromines in the RMI process?

Practical information:

Before we start the interview there's 5 things I want to inform you about.

1. As mentioned in the e-mail, the purpose of this conversation is to find out how you have experienced the process of RMI. Your thoughts, reflections and experiences on this issue are what matters. I am not looking for measurable facts in numbers, but your impressions. Feel free to tell about concrete episodes and/or conversations you've had.

2. I will use the interview to discuss the research question. With regard to confidentiality, what is said between you and me will stay in the framework of academic research. If you prefer that I remove directly identifiable personal information, I will do this. At the same time, there is no doubt that I would prefer to use your name because it will make the analysis better. I am of course happy to send you a quote check. I will come back to this at the end of our conversation.

4. You can choose to stop the interview whenever you want.

5. I would like to use the recorder on my phone and assure you that I will delete the interview when I have finished the thesis – 15th of May 2014 at the latest.

Does this sound OK to you?

➔ Start recording.

First part

Could you tell me about the first time the issue of access to raw materials for European industry came on the agenda?

- What was the background for this?
- How did you experience this?
- What happened?

Could you walk me through the years *prior* to the launching of the RMI in 2008?

- What did Euromines do in this period?

Second part

Regarding the RMI, what has been important for Euromines, and what actions did you take?

Have Euromines had particular strategies to achieve influence in the designing of RMI?

- Examples?
- When did you do this?
- How did you experience this?

How did you experience the period between 2008 up until the second publication in 2011?

How would you describe your access to European decision makers?

- Can you tell more about this?
- What form does this access take?

What is your current situation with regard to the process of RMI? What are you doing?

You have participated in the ad-hoc group on defining critical raw materials. If I was a member of this group, what will I see and experience in these meetings?

- Do you participate in other expert groups?
- When did you become a member of this group?
- How would you describe the conversations?
- What are the arguments put forward in this group (from different stakeholders)?
- How would you describe relations between the individuals of the group?

How did the ad-hoc group decide on the definition of “critical raw materials”?

You have worked for Eurometaux, and Euromines is today a member of Eurometaux. How will you describe the relation between the two, when it comes to the process of RMI?

How would you describe the role of Euro associations in the process of RMI?

In the process of RMI what would you say has been the role of networks?

From your point of view what are the success criteria to gain influence, in this case the RMI?

Based on your impression, to what degree has the Commission been open for policy in-puts from different actors?

Third part

With regard to influencing the RMI, what would you say has been the most challenging in your position? How do you seek to meet/solve these challenges?

Based on your experiences, do you consider the process of RMI to be fair?

Summing up

I sum up what I consider to be my findings (by now I should have an idea of who the interviewee considers were driving the RMI, who have gained influence and why).

Have I understood you correctly?

If necessary: Make corrections – sum up again.

Is there anything you want to add?

In case I still need to clear up some things: Will it be OK if I e-mail you?

Finally, as I mentioned in the beginning of the interview, I will remove directly identifiable personal if this is desirable. Do you have any preferences on this?

Appendix 4 – List of the members of Eurometaux

Type of membership:	Number
1) National membership (these are mainly national federations)	14
2) European Non-Ferrous Metals Commodity Associations	6
3) Private companies	22
4) Associate members	12

National Members

EU-members

Agoria	(Belgium-1)
AFA (Association française de l'Aluminium ---- FEDEM	(France -2)
Association of Finnish Steel & Metal Producers, Metallinjalostajat	(Finland-1)
Assomet	(Italy-1)
BAMI (Bulgarian Association of the Metallurgical Industry)	(Bulgaria-1)
IGMNiR (Polish Economic Chamber/Ass. of Non-Ferrous Metals & Recycling)	(Poland-1)
Johnson Matthey	(UK-1)
SveMin (Swedish Association of Mines, Mineral & Metal Producers)	(Sweden-1)
Unicobre	(Spain-1)
VNMI (Vereniging Nederlandse Metallurgische Industrie)	(The Netherlands-1)
WVM (Wirtschaftsvereinigung Met	(Germany-1)
WKO (Association of the Austrian Non-Ferrous Metals Industry)	(Austria-1)

Non EU-members

Norsk Industri (Federation of Norwegian Industries)	(Norway-1)
Association Suisse des Métaux Précieux	(Switzerland-1)

European Non-Ferrous Metals Commodity Associations

<u>EAA (European Aluminium Association)</u>	<u>(European)</u>
<u>ECI (European Copper Institute)</u>	<u>(European)</u>
<u>EPMF (European Precious Metals Federation)</u>	<u>(European)</u>
<u>ILA-Europe (International Lead Association Europe)</u>	<u>(European)</u>
<u>IZA-Europe (International Zinc Association Europe)</u>	<u>(European)</u>
<u>Nickel Institute</u>	<u>(Global)</u>

Company Members

<u>Alcoa Europe</u>	<u>(European)</u>
<u>Anglo American</u>	<u>(UK)</u>
<u>Atlantic Copper</u>	<u>(US)</u>
<u>Aurubis (formerly Norddeutsche Affinerie AG)</u>	<u>(Germany/other European countries)</u>
<u>BHP Billiton</u>	<u>(Britain/Australia)</u>
<u>Boliden AB</u>	<u>(Sweden)</u>
<u>ECO-BAT Technologies</u>	<u>(Multinational)</u>
<u>Elkem</u>	<u>(China, partly Norway)</u>
<u>Eramet</u>	<u>(France)</u>
<u>Fesil</u>	<u>(Norway/Luxembourg and many other countries)</u>
<u>Finnfjord</u>	<u>(Norway)</u>
<u>Hydro</u>	<u>(Norway)</u>
<u>KGHM Polska Miedz</u>	<u>(Poland)</u>
<u>Metallo Chimique</u>	<u>(International/Belgium)</u>
<u>Norilsk Nickel Finland Oy</u>	<u>(Finland)</u>
<u>Nyrstar</u>	<u>(Belgium/ Switzerland and international)</u>
<u>Plansee</u>	<u>(Austrian)</u>
<u>Rio Tinto Alcan</u>	<u>(Canada)</u>
<u>Umicore</u>	<u>(multinational/Belgium headquarter)</u>
<u>Vale Inco /Vale Canada Limited</u>	<u>(Canada)</u>
<u>Wieland Werke</u>	<u>(Germany)</u>
<u>Xstrata Zinc</u>	<u>(UK and Switzerland)</u>

Associate Members

Euromines

BeTS (Beryllium Science & Technology Association)

CDI (Cobalt Development Institute)

EPMA (European Powder Metallurgy Association)

Euroalliages

EUROBAT (European Storage Battery Manufacturers Association)

I2a (International Antimony Association)

IMoA (International Molybdenum Association)

LME (London Metal Exchange)

RECHARGE (Int.Ass. for the Promotion & Management of Portable Rechargeable Batteries)

Tin Technology Ltd. (ITRI)

VANITEC (Vanadium International Technical Committee)

Source: Eurometaux (2012b).

Appendix 5 – List of the members of Euromines

European Association of Mining Industries, Metal Ores & Industrial Minerals

Type of membership:	Number
1) Members of the EU	15
2) Associations of Euromines	13
3) Associated companies of Euromines	3
4) Associate federations of Euromines	3

Member companies

Members of the EU

<u>Ingmar Haga</u>	(Finland-1)
<u>Anglo American Plc ---- Cleveland Potash Ltd ---- Ortac ---- Iber potash</u>	(UK- 4)
<u>Dalradian Gold Ltd</u>	(UK/Northern Ireland-1)
<u>Boliden AB ---- Lundin Mining AB ---- Nordic Mines</u>	(Sweden -3)
<u>ELMIN ---- Hellenic Mining Enterprises S.A.</u>	(Greece-2)
<u>EMED Mining PLC</u>	(Cyprus-1)
<u>European Uranium Resources, Ltd.</u>	(Slovakia-1)
<u>KGHM Polska Miedź</u>	(Poland-1)
<u>Kinbauri España, S.L. - Magnesitas de Rubian - Magnesitas Navarras S.A.</u>	(Spain- 3)
<u>LKAB Group</u>	(Belgium-1)
<u>Nedmag Industries</u>	(The Netherlands-1)
<u>Rosia Montana Gold Corporation</u>	(Romania-1)

Non EU-members

<u>Eldorado Gold Corporation - Dundee Precious Metals Inc.</u>	(Canada-2)
<u>Koza Altin Sirketi – Ovacik Altin Madeni</u>	(Turkey-1)
<u>Magnezit Group</u>	(Russian Federation-1)

Associations

Members of the EU

<u>Bulgarian Chamber of Mining and Geology</u>	<u>(Bulgaria-1)</u>
<u>ANIET - Associação Nacional da Indústria Extractiva e Transformadora</u>	<u>(Portugal- 1)</u>
<u>Hungarian Mining Association</u>	<u>(Hungary-1)</u>
<u>Fachverband Bergwerke und Stahl – Austrian Mining and Steel Association</u>	<u>(Austria-1)</u>
<u>FinnMin - Kaivannaisteollisuus ry</u>	<u>(Finland-1)</u>
<u>Geokompetenzzentrum Freiberg e.V. - Verband der Kali- und Salzindustrie e. V.</u>	
<u>- Vereinigung Rohstoffe und Bergbau</u>	<u>(Germany-3)</u>
<u>Greek Mining Enterprises Association</u>	<u>(Greece-1)</u>
<u>Irish Mining and Exploration Group (IMEG)</u>	<u>(Ireland-</u>
<u>1)</u>	
<u>Mining Association of the United Kingdom</u>	<u>(UK-1)</u>
<u>Slovak Mining Chamber</u>	<u>(Slovakia-1)</u>
<u>SVEMIN - Swedish Association of Mines, Mineral and Metal Producers</u>	<u>(Sweden-1)</u>
<u>Těžební unie</u>	<u>(Czech Republic-1)</u>
<u>Związek Pracodawców Polska Miedź Employers' Association of Polska Miedź</u>	<u>(Poland-1)</u>

Non EU-members

<u>Turkish Gold Mining Association ---- Turkish Miners Association</u>	
<u>- IMMIB - Istanbul Mineral and Metals Exporters' Association</u>	<u>(Turkey-3)</u>
<u>Norsk Bergindustri - Norwegian Mining and Quarrying Industries</u>	<u>(Norway-1)</u>

Associated companies

EU-members

<u>CyPlus GmbH</u>	<u>(Germany-1)</u>
<u>Natural Resources GP</u>	<u>(Greece-1)</u>
<u>BRGM</u>	<u>(France-1)</u>

Associate federations

EU-members

<u>Euroslate</u>	<u>(Germany-1)</u>
<u>The Barytes Association</u>	<u>(Belgium-1)</u>

Non EU-members

<u>Association of Mining and Metallurgical Enterprises</u>	<u>(Kazakhstan-1)</u>
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Source: Euromines (2014).