

President Roberta Metsola and
Leaders of the Political Groups in the European Parliament
European Parliament
Rue Wiertz 60
B-1047 Brussels

Via email: roberta.metsola@europarl.europa.eu terry.reintke@europarl.europa.eu bas.eickhout@europarl.europa.eu
manon.aubry@europarl.europa.eu martin.schirdewan@europarl.europa.eu manfred.weber@europarl.europa.eu
iratxe.garcia-perez@europarl.europa.eu valerie.hayer@europarl.europa.eu
Cc: Kerstin.JORNA@ec.europa.eu Joan.CANTON@ec.europa.eu grow-crma-strategic-projects@ec.europa.eu
charlotte.griffiths@un.org

23 April 2025

Dear President Metsola and Honorable Leaders of the Political Groups,

We are civil society organisations directly and individually impacted by extractive projects granted strategic status by the Commission on 25 March 2025.¹ Our letter is also signed by NGOs, law firms and formal and informal groups working on the rule of law, environmental protection, human rights, extractivism etc.. Together we count 230 signatories which in turn represent millions of citizens from 9 member states and beyond.

Since the Commission's Decision of 25 March 2025² several of the undersigned organisations submitted access to information requests,³ under our rights guaranteed by the European Union.⁴ Each is asking for the full applications⁵ for strategic status recognition; including additional documents as per Article 7(1) and Article 7(6) of Regulation (EU) 2024/1252 and a copy of the methodology used for assessing the applications received within the cut-off date of 22 August 2024.

We need access to this information to scrutinize whether the applications meet all legal requirements and when not, consider our onward options. These include internal review requests under Commission Decision (EU) 2023/748 of 11 April 2023⁶ which must be submitted within 8 weeks after the administrative act has been adopted or published in the Official Journal.⁷

While we are awaiting official responses to our requests, based on meetings with officials from DG GROW, it intends to refuse to make the requested information available, referring to exceptions including 'business-sensitive' information. Instead it would only publish short summaries as well as *consider* sharing UNFC submissions or assessments. We would argue that the involvement of

¹ <https://webgate.ec.europa.eu/circabc-ewpp/d/d/workspace/SpacesStore/1958718b-21e9-40f4-9c9f-42a58dc4c5a3/file.bin> and Annex <https://webgate.ec.europa.eu/circabc-ewpp/d/d/workspace/SpacesStore/d307a581-8530-493c-9efa-b2cd179d4677/file.bin>

² <https://webgate.ec.europa.eu/circabc-ewpp/d/d/workspace/SpacesStore/1958718b-21e9-40f4-9c9f-42a58dc4c5a3/file.bin> and Annex <https://webgate.ec.europa.eu/circabc-ewpp/d/d/workspace/SpacesStore/d307a581-8530-493c-9efa-b2cd179d4677/file.bin>

³ I.e. https://www.asktheeu.org/request/request_for_all_documents REGARD

⁴ Regulation (EU) 1049/2001 and Regulation (EU) 1367/2006 of the European Parliament and of the Council

⁵ https://single-market-economy.ec.europa.eu/calls-expression-interest/call-applications-strategic-projects-under-critical-raw-materials-act_en

⁶ <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32023D0748>

⁷ https://environment.ec.europa.eu/law-and-governance/aarhus/requests-internal-review_en & <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=legisum:l28140>

public money⁸ to finance commercial mines declared strategic as well as the overriding public interest in the disclosure of the requested information and our rights to access public and environmental information override these exemptions. We acknowledge that detailed subsurface and deposit data on critical minerals, as well as information withheld by a project owner from shareholders, may not be accessible. Yet, the applications and the detailed UNFC evaluations, and the respective evaluations by the Commission and external experts also include social and environmental assessments; including on greenhouse gas emissions and other expected emissions into the environment.

Earlier in 2024, several NGOs already requested documents on strategic projects from DG GROW. They were refused on the grounds of commercial interests and the still ongoing selection process. Confirmatory applications are pending with the Secretariat-General with several exceeding by far the time limits established by Article 8 (1) and (2) of Regulation (EU) 1049/2001.

The public's right to such information is firmly rooted in EU and international law, including the Aarhus Convention, Regulation (EC) No 1367/2006, and Directive 2003/4/EC, which clearly state that emissions-related data cannot be withheld on grounds of commercial confidentiality. This position has been upheld by the Court of Justice in Flachglas Torgau (C-204/09). Moreover, Article 42 of the European Charter of Fundamental Rights guarantees citizens the right to good administration and access to documents. Supporting transparency in these matters is not only a legal obligation, but a vital step in reinforcing democratic participation, institutional accountability, public trust in the EU and the European project as such. Ensuring public scrutiny of projects with significant environmental impact strengthens our democracy and our Union.

What's more, article 15 of the TFEU stipulates that "to promote good governance and ensure the participation of civil society, the Union institutions, bodies, offices and agencies shall conduct their work as openly as possible." The Treaty thus reaffirms the EU's commitment to the principles of transparency and openness, which are meant to channel the participation of civil society in EU governance because they lead to better decisions.

As the President of the European Parliament and Leaders of the Political Groups, you collectively represent an institution directly elected by EU citizens, that is supposed to represent the interests of the people. Numerous reports⁹ as well as resolutions passed in your house highlight that the EU's rule of law has been eroding. What worries us is that if the European Commission refuses to provide access to documents containing information that may impact the public interest, then the EU is in danger of further democratic backsliding or autocratization. If we look at certain countries, we see that when transparency, democratic processes and the rule of law are weakened to benefit poorly regulated sectors, such as noncompliant extractive projects, it

⁸ Having obtained the status of a strategic project under the CRMA allows project promoters to request a meeting of the financing subgroup according to article 16 of the CRMA to discuss and provide advice on how the financing of the project can be completed, taking into account private and public sources of funding. This subgroup brings together relevant national promotional banks, the EIB, EBRD and private financial institutions, among others.

The status of a strategic project also ensures the possibility for regional and national authorities to make use of funding from the European Development Fund and Cohesion Fund to support the relevant project, in line with the new STEP Regulation. Source: https://single-market-economy.ec.europa.eu/sectors/raw-materials/areas-specific-interest/critical-raw-materials/strategic-projects-under-crma/faq_en

⁹ <https://www.liberties.eu/en/stories/rolreport2024-main/45014>

<https://www.abacademies.org/articles/Erosion-of-the-rule-of-law-in-the-European-union-1544-0044-24-7-808.pdf>

<https://www.europarl.europa.eu/news/en/press-room/20240223IPR18084/parliament-calls-for-action-against-the-erosion-of-eu-values-in-member-states> etc.

leads to inequality, environmental pollution, social unrest, and increased political risk. Typically the space for public contest and political participation in decision-making is restricted and the exercise of political power becomes more arbitrary and restrictive. Also in the interest of the urgent energy transition [that has our full backing] to combat climate change, Europe should not go down that road and work as openly as possible. It is in this spirit that we call on you to urgently use all means at your disposal to call on DG GROW to release the information requested under Regulation (EU) 1049/2001 and Regulation (EU) 1367/2006 of the European Parliament and of the Council.

We look forward to your reply and remain

Yours sincerely,

Signatories directly and individually affected by the Commission's Decision of 25 March 2025:

1. A Sachola, Barroso (Portugal)
2. A de Rousmeri galpón social, Terra de Montes (Spain)
3. Agricultores y ganaderos de Holguera afectados por la mina de Las Navas (Spain)
4. Aldea Cabalar Crecente, A Lama (Spain)
5. Amigos de la Cornisa Este, Sevilla (Spain)
6. Asamblea de Amig@s del Huerto del Rey Moro "La Noria" , Sevilla (Spain)
7. Association of Mothers and Fathers of School Children (ANPA) CEIP Cal do Vergazo, A Lama (Spain)
8. Asociación A Lama Vive (Spain)
9. Asociación Alarma na Terra de Montes (Spain)
10. Asociación Asemblea do Suído, Serra do Suído (Spain)
11. Asociación Cultural Grimalrock, Grimaldo, Cañaveral (Spain)
12. Asociación de Amigos de San Isidoro, Holguera (Spain)
13. Asociación de Monitores medioambientales "Almijara", Sevilla (Spain)
14. Asociación de Geógrafos e Historiadores de Alcosa "Prometeo", Sevilla (Spain)
15. Asociación de San Marcos y San Roque, Holguera (Spain)
16. Asociación de Vecinos de Doade, Beariz (Spain)
17. Asociación de Vecinos Ecologistas Parque de los Príncipes, Sevilla (Spain)
18. Asociación de Vecinos El Papá Francisco y La Inmaculada, Grimaldo (Spain)
19. Asociación de Vecinos Las Praderas de Santa Clara, Sevilla (Spain)
20. Asociación de Vecinos Los Remedios, Sevilla (Spain)
21. Asociación de Vecinos de Rubillón, Avión (Spain)
22. Asociación de Vecinos Ecologistas Parque de los Príncipes, Sevilla (Spain)
23. Asociación Ecologistas del Real de la Jara (ASERJA), (Spain)
24. Asociación Ficus de San Jacinto, Sevilla (Spain)
25. Asociación Fonte dos Chaos da Barcia do Seixo, A Lama (Spain)

26. Asociación Lebrijana por Los Derechos Humanos y Servicios Públicos La Colectiva, Sevilla (Spain)
27. Asociación Ni Un Árbol Menos, Sevilla (Spain)
28. Asociación Medioambiental, Cultural y Gastronómica “Alaire”, Chipiona (Spain)
29. Asociación Montequinto Ecológico (AME), Sevilla (Spain)
30. Asociación para la Recuperación del Bosque Autóctono (ARBA), Sevilla (Spain)
31. Asociación Parque Vivo del Guadaira, Sevilla (Spain)
32. Asociación pola Defensa da Ría de Pontevedra (APDR) (Spain)
33. Asociación Rexeneración Autóctona, Pontecaldelas (Spain)
34. Asociación Rural Hackers, Pontecaldelas (Spain)
35. Asociación Sevillana de Entidades y Personas para la Economía Social (ASEPES), Sevilla (Spain)
36. Asociación Sevilla se muere (Spain)
37. Asociación sociocultural La Simiente de Lebrija (Spain)
38. Asociación Torrenatura, Sevilla (Spain)
39. Asociación vecinal La Revuelta, Sevilla (Spain)
40. Asociación Vecinal Las Portadas, Dos Hermanas, Sevilla (Spain)
41. Asociación Vecinal Pulmón Verde Arrayán, Sevilla (Spain)
42. Asociația EcouRovinaBucuresci (România)
43. Asociația pentru protejarea Munților Apuseni-Rovina (România)
44. A Tralha da Terra de Montes (Spain)
45. Centro Social A Pedreira, Pontevedra (Spain)
46. CINVALD z.s., Cínovec, Dubí (Czech Republic)
47. Club de Amigos de la Naturaleza SCIPIONIS - C.A.N.S., Chipiona (Spain)
48. Colectivo A Rente do Chan-PLADEVER, Pontecaldelas (Spain)
49. Colectivo Arroutada, Pontecaldelas (Spain)
50. Colectivo Er Verdó, Sevilla (Spain)
51. Colectivo SOS Santa Clara, Sevilla (Spain)
52. Common Lands Community Lama Cega Besticobo Doade, Beariz (Spain)
53. Common Lands Community Framia, Beariz (Spain)
54. Common Lands Community Correa, Beariz (Spain)
55. Common Lands Community Rubillón, Beariz (Spain)
56. Common Lands Community Couso, Avión (Spain)
57. Common Lands Community A Escuadra, A Lama (Spain)
58. Cooperativa del Campo San Roque, Holguera (Spain)
59. Coordinadora ciudadana de Parque Alcosa “la Fea”, Sevilla (Spain)
60. Coordinadora Somos Suído, Serra do Suído (Spain)
61. Declic Association (Romania)
62. Ecologistas en Acción La Algaba (Spain)

63. Ecoloxistas en Acción Ourense (Spain)
64. Ecoloxistas en Acción Rías Baixas (Spain)
65. Ecologistas en Acción Sanlúcar de Barrameda (Spain)
66. Ecologistas en Acción Ciudad de Sevilla (Spain)
67. ECOURBE, Sevilla (Spain)
68. El Equipo Verde de Sanlúcar la Mayor, Sevilla (Spain)
69. Extinction Rebellion Sevilla (Spain)
70. Fundación Savia por el compromiso y los valores, Sevilla (Spain)
71. Fridays For Future Sevilla / Juventud por el Clima Sevilla (Spain)
72. Gabna sameby, Kiruna (Sweden)
73. Huelva Te Mira (Spain)
74. Jalea Luz, Comunidad Energética de San Jerónimo, Sevilla (Spain)
75. La Hermandad Mareantes del Sur, Puerto de Gelves, Sevilla (Spain)
76. Mesa de la Ría de Huelva (Spain)
77. Plataforma Ciudadana Árboles de Camas, Sevilla (Spain)
78. Plataforma Contra la Incineración de los Residuos de los Alcores-Sevilla (Spain)
79. Plataforma 'No a la Mina de Cañaveral' (Spain)
80. Plataforma de Defensa do Sur da Dorsal Galega (Spain)
81. Plataforma en Defensa de Sanidad Pública de Lebrija (Spain)
82. Plataforma Salva Tus Árboles Sevilla (PlaSTAS) (Spain)
83. Plataforma Salvemos el Guadalquivir, Sevilla (Spain)
84. Plataforma SOS Suído-Seixo/Mina Alberta NON, Monte do Seixo e Serra do Suído (Spain)
85. Red Sevilla por el Clima (Spain)
86. Sociedad ecologista Alwadi-ira / Ecologistas en Acción, Sevilla (Spain)
87. Salmorejo Rebelde, Sevilla (Spain)
88. Sompion Luonnonystävät Savukoski-Sodankylä (Finland)
89. SOS GUADALQUIVIR, Sevilla y Cádiz (Spain)
90. Suomen Luonnonsuojeluliiton Lapin piiri (Finland)
91. Unidos em Defesa de Covas do Barroso (Portugal)
92. Vai de Vagar Beariz (Spain)
93. WWF (World Wide Fund for Nature) - Grupo local en Sevilla (Spain)

Additional Signatories:

94. ACDE Treze Catorze, Galiza (Spain)
95. ADECASAL. Asociación para el desarrollo del Campo de Salamanca y Ledesma, Salamanca (Spain)
96. A.C.I.B.A.L. (Asociación cultural e informativa da biodiversidade das aldeas), Moraña (Spain)
97. A do Gardarríos, Galiza (Spain)

98. AFA, Asociación, Familias, Alumnado CEIP Obispo Álvarez de Castro, Hoyos, Cáceres (Spain)
99. AmA Cáceres (Spain)
100. Amigas das Árbores de Ourense (Spain)
101. Amigas da Terra, Galicia (Spain)
102. Amigas de la Tierra España (Spain)
103. Amil sen Eólicos, Moraña (Spain)
104. AMPA “El Rehuto” Torre de Don Miguel, Sierra de Gata (Spain)
105. Ándalus, Asociación para la Supervivencia de la Naturaleza y el Medio Ambiente (Spain)
106. ASENAVIS (Asociación para el espacio natural y la vida silvestre), Ciudad Rodrigo (Spain)
107. Asociación 25 de Marzo, Extremadura (Spain)
108. Asociación Actúa por un mundo sostenible, Valle Tiétar (Spain)
109. Asociación ambiental e cultural Tralapena, Galicia (Spain)
110. Asociación Ambiental Senda Nova da Costa da Morte (Spain)
111. Asociación ALDABA educación y desarrollo comunitario, Sierra de Gata (Spain)
112. Asociación Caballos Cima de Vila, San Adrián de Calvos, Fornelos de Montes (Spain)
113. Asociación Círculo de Patrimonio Cultural de Huelva (Spain)
114. Asociación Colectiva Sana, Sierra de Gata (Spain)
115. Asociación cultivarte occidente, Asturias (Spain)
116. Asociación Cultural Amal Alto Tiétar (Spain)
117. Asociación Cultural e Medio Ambiental “A PEDRA QUE FALA” de San Xoan de Fecha-Santiago (Spain)
118. Asociación Cultural Mandingata, Sierra de Gata (Spain)
119. Asociación Cultural Obra Campamental (ACOC), Sierra de Gata (Spain)
120. Asociación dasonómica El Campillo, Cabo de Gata, Almería (Spain)
121. Asociación de Amigos de la Ribera del Marco, Cáceres (Spain)
122. Asociación de Defensa del Patrimonio de Andalucía (ADEPA) (Spain)
123. Asociación de la Manzanilla Cacereña ASOMANCA, Sierra de Gata (Spain)
124. Asociación de Mujeres cultural y ambiental Hiedra Papel Tijera (HiPaTi-A), Gerena (Spain)
125. Asociación Defiende el Calerizo de Cáceres (Spain)
126. Asociación de hombres por la Igualdad (AHIGE), Sierra de Gata (Spain)
127. Asociación de Propietarios Forestales Valle del Arrago, Descargamaria, Cáceres (Spain)
128. Asociación de Vecinos Sierra de la Mosca, Cáceres (Spain)
129. Asociación de Vecinos VALDELAMUSA VIVA, Cortegana, Huelva (Spain)
130. Asociación Ecologista Ituci Verde, Huelva (Spain)
131. Asociación Ecoloxistas Galicia “Atlántica e Verde” (Spain)
132. Asociación en defensa de la naturaleza Vettonia, Sierra de Gata (Spain)
133. Asociación “El Pandero Cuadrado de Peñaparda”, Salamanca (Spain)
134. Asociación Escuela del Ser: Música, Artes y Autoconocimiento, Sierra de Gata (Spain)

135. Asociación Imora, Plasenzuela, Cáceres (Spain)
136. Asociación Irimia, Galicia (Spain)
137. Asociación Metik, Sierra de Gata (Spain)
138. Asociación Mosaico, Sierra de Gata (Spain)
139. Asociación “Paraje la Albuquerque” Coín, Malaga (Spain)
140. Asociación para a Defensa Ecolóxica de Galiza (ADEGA) (Spain)
141. Asociación para la defensa de la Naturaleza y los Recursos de Extremadura (ADENEX) (Spain)
142. Asociación para la Recuperación del Bosque Autóctono (ARBA), Extremadura (Spain)
143. Asociación Plataforma Cívica Alcalabozza Viva, Sierra de Aracena y Picos Aroche, Huelva (Spain)
144. Asociación Plataforma contra la mina a cielo abierto en el Nordeste Segoviano (Spain)
145. Asociación Okola, educación y salud, Cáceres (Spain)
146. Asociación Salvemos la Hacienda Ibarburu y el Patrimonio de Dos Hermanas (Spain)
147. Asociación Sierra de Gata Sostenible (Spain)
148. Asociación socio-cultural Charco Palo de El Payo, Salamanca (Spain)
149. Asociación Vecinal de las Portadas, Dos Hermanas (Spain)
150. Asociación Vecinal del Casco Norte, “La Revuelta”, Sevilla (Spain)
151. Asociación “Vive el Valle del Corneja”, Ávila (Spain)
152. A Sabia Moeda Galega (Spain)
153. ASDECOBA. Asociación para el desarrollo comunitario del barrio Buenos Aires, Salamanca (Spain)
154. Ateneo Andaluz de Dos Hermanas, Sevilla (Spain)
155. BI-Liebenau (Germany)
156. BI-Bärenstein (Germany)
157. Cala. Asociación Taller de Educación En Valores Alternativos, Extremadura (Spain)
158. Centro de Saberes para a Sustentabilidade (Spain)
159. Colectivo do Vento, Campo Lameiro (Spain)
160. Co-mando Ghichas, grupo de Acción e Concienciación Social do Val Minor (Spain)
161. Comité Antinuclear y Ecologista de Salamanca (Spain)
162. Common Lands Community VMC de Vincios, Gondomar (Spain)
163. Compostela Non Monógama (Spain)
164. Cooperativa de Consumo La Garbancita Ecologista S.Coop.Madrid (Spain)
165. Cooperativa “En Verde”, Extremadura (Spain)
166. Coordinadora extremeña en Defensa del Sistema Público de Pensiones y todo lo público COESPE (Spain)
167. Earth Thrive (UK /Balkans)
168. Ecologistas “Acuho”, Béjar (Salamanca) (Spain)
169. Ecologistas en Acción (Spain)
170. Ecologistas en Acción Castilla la Mancha (Spain)
171. Ecologistas en Acción Dehesas y Villuercas, Extremadura (Spain)

172. Ecologistas en Acción Extremadura (Spain)
173. Ecologistas en Acción do Barbanza (Spain)
174. Ecologistas en Acción Galiza (Spain)
175. Ecologistas en acción en Valdepeñas (Spain)
176. Ecologistas en Acción Mangurria, grupo local de Cáceres (Spain)
177. El Lokalino, Espacio Cultural, Montijo, Badajoz (Spain)
178. Enxeñería Sen Fronteiras Galicia (Spain)
179. Espacio Verde Cortijo de Cuarto (EVCC), Sevilla (Spain)
180. Fundación Montescola (Spain)
181. Fundación Naturaleza y Hombre, Astillero, Cantabria (Spain)
182. Fundacja Splot Społeczny (Poland)
183. Fundación Sustrai Erakuntza, Navarra (Spain)
184. Fundación Transhumancia y Naturaleza, Sierra de Gata (Spain)
185. Foro Extremeño Antinuclear (Spain)
186. GBH Miljörätt (Sweden)
187. Grupo EcoJerte, Valle del Jerte, Cáceres (Spain)
188. Independent Centre for the Development of Environmental Resources/ MiningWatch Romania (Romania)
189. Interessengemeinschaft Zinnwald (Germany)
190. Marš sa Drine (Serbia)
191. Micro refugio de Mariposas Almaillo, Sierra de Gata (Spain)
192. Movimiento Iberico Antinuclear (Spain)
193. Naturaleza Amiga, Extremadura (Spain)
194. Naturskyddsföreningen i Norrbottens län (Sweden)
195. Naturskyddsföreningen i Kiruna (Sweden)
196. La Enredadera, Merida (Spain)
197. La Zarzosa Cooperativa Agroecológica, Valle del Tiétar (Spain)
198. MiningWatch Portugal / Associação Observatório dos Recursos Naturais (Portugal)
199. Onubenses Unidos por una Sanidad Pública de Calidad (ONUSAP) (Spain)
200. Organización Galega de Comunidades de Montes Veciñais en Man Común (ORGACMM), Galicia (Spain)
201. Outonía S. Coop, Quiroga (Spain)
202. Petition Committee of “Petition against mining in Cínovec and the processing plant in Újezdeček”, Teplice (Czech Republic)
203. Plataforma de Afectados por Metales Pesados (Spain)
204. Plataforma Alconchel sin Mina, Badajoz (Spain)
205. Plataforma Bierzo Aire Limpio (Spain)
206. Plataforma Ciudadana Salvar Chira-Soria Barranco de Arguineguín, Canarias (Spain)

- 207. Plataforma Ciudadana Stop Uranio de Retortillo, Salamanca (Spain)
- 208. Plataforma Comarca de Olivenza sin Minas, Badajoz (Spain)
- 209. Plataforma Mina Touro O Pino NON (Spain)
- 210. Plataforma No a la mina en la Sierra de Yemas, Ávila (Spain)
- 211. Plataforma “No a la mina en el valle del Corneja”, Ávila (Spain)
- 212. Plataforma ORO NO, Salave (Spain)
- 213. Plataforma por un mundo rural y urbano vivos, Salamanca (Spain)
- 214. Plataforma Salvemos la Montaña de Cáceres (Spain)
- 215. Plataforma Salvemos las Villuercas, Cáceres (Spain)
- 216. Plataforma Sierra de Gata Viva (Spain)
- 217. Plataforma Rebollar Vivo (Spain)
- 218. Plataforma Ulloa Viva (Spain)
- 219. Plataforma unitaria en contra de las minas de potasa en la Bal D’Onsella y la Sierra del Perdón, Aragón (Spain)
- 220. Red Andaluza de Custodia del Territorio (Spain)
- 221. Red Utrera por el Clima, Sevilla (Spain)
- 222. Sindicato CGT Huelva (Spain)
- 223. Sindicato Labrego Galego. Comisiones Labregas (Spain)
- 224. Sociedad Española de Agricultura Ecológica y Agroecología, Sierra de Gata (Spain)
- 225. Sociedad Extremeña de Zoología (Spain)
- 226. Sociedade Histórica e Cultural Coluna Sanfins (Spain)
- 227. SOS Ibarburu, Dos Hermanas, Sevilla (Spain)
- 228. StopMines03 (France)
- 229. Udruženje za zaštitu šivotne sredine (Serbia)
- 230. Valle del Arte: asociación cultural, Valle del Tiétar (Spain)