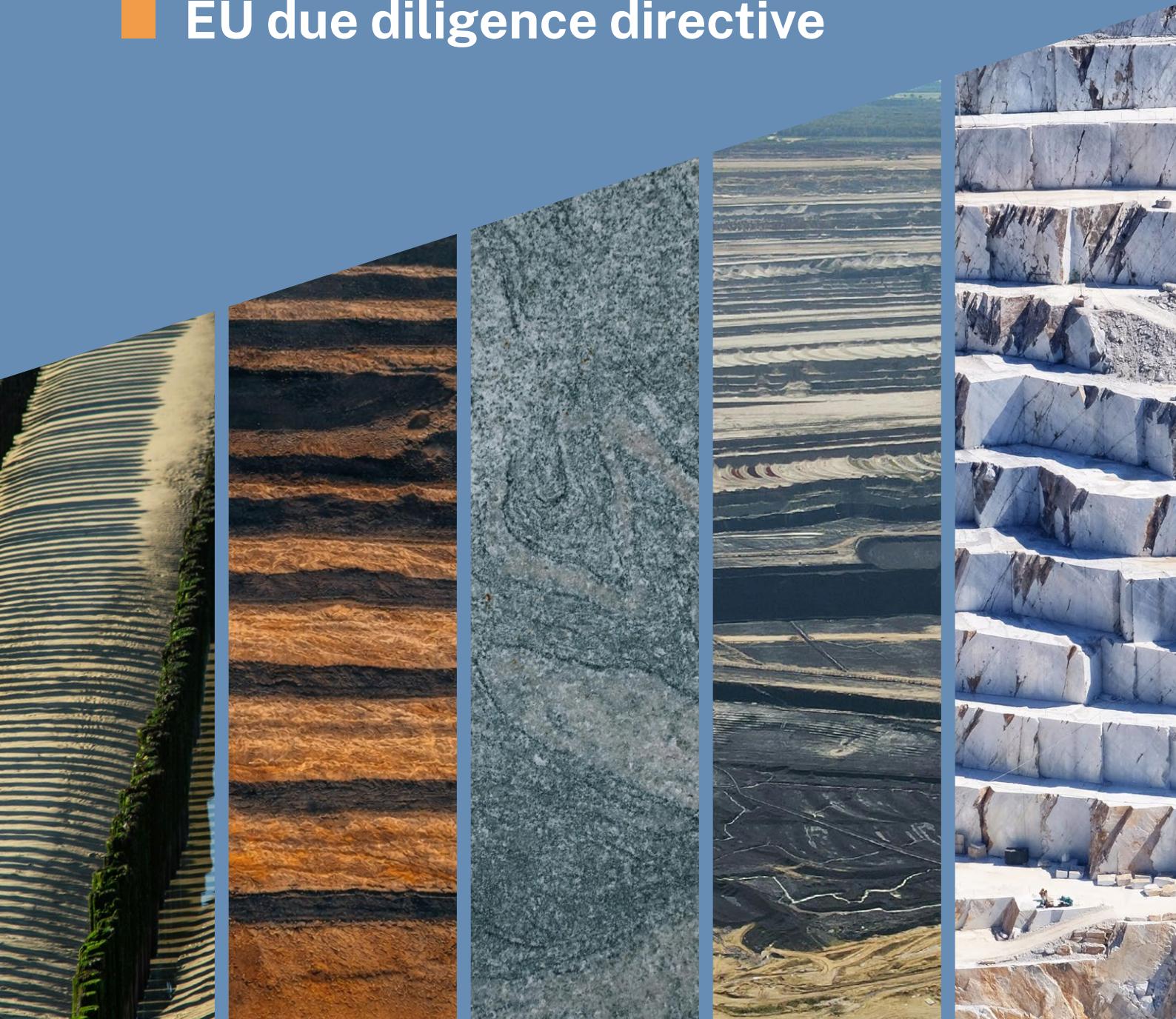


■ Shaping EU Due Diligence:
mining sector lobbying of the CSDDD

Coordinated lobbying: How mining trade associations amplified their positions on the EU due diligence directive



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Coordinated lobbying: How mining trade associations amplified their positions on the EU due diligence directive

Social LobbyMap (SLM) analyses company and trade association lobbying activities in relation to human rights and labour standards, with the aim of increasing transparency and accountability. This article is the third and final publication in a series focused on the metals and mining sector's political engagement on social regulation and human rights due diligence.

In relation to lobbying on the Corporate Sustainability Due Diligence Directive (CSDDD), the metals and mining sector¹ relied heavily on trade associations to lead its activities and had lower levels of engagement when compared to SLM's previous analyses of other sectors.² Despite low levels of public engagement, the research identified strong collaboration amongst trade associations as well as a series of individual and joint meetings held with the

European Commission. Through the assessment of responses to the European Commission's 2nd phase of the CSDDD consultation, it became apparent from the framing and language of responses that metals and mining trade associations were working together, with some entities providing duplicated responses to open-ended questions. While trade associations coordinating lobbying positions is not inherently problematic, the analysis finds that the highest levels of collaboration were in relation to oppositional or non-supportive positions on the CSDDD. Further, this level of coordination without transparency, or that incorrectly signals sectoral consensus, can be misleading. Overall, despite individual entities' engagement scores being low, their positioning was amplified through collaboration, repetition of positioning, and closed-door meetings.

- 1 The scope of the metals and mining sector captured in this analysis is limited to the 17 entities that were identified for having responded to at least one of the three phases of the European Commission's Sustainable Corporate Governance consultation on the CSDDD.
- 2 Metals and mining entities that engaged on the CSDDD had an overall lower average engagement intensity score than entities that form apparel, food product, and energy, oil, and gas sectors. For more details on the SLM findings of these sectors, please see The lobbying effect: How corporate influence shaped the EU's sustainability Omnibus proposal, A Social LobbyMap Analysis, EIRIS Foundation, October 2025, <https://sociallobbymap.org/wp-content/uploads/2025/09/EIR03-Omnibus-Document-v2.pdf>.

As part of the SLM's broader analysis, the main flagship report assesses the lobbying activities of the major metals and mining companies that are engaged through the PRI Advance Initiative. It assesses these entities' lobbying in relation to the CSDDD as well as highlights additional case studies where mining companies lobbied on social legislation.³ The second publication, *Lobbying imbalance: A sector-wide analysis of mining engagement on the CSDDD*, expands the analysis of the metals and mining sector's lobbying on the CSDDD to capture additional companies and associations beyond those engaged by PRI Advance.

Building on these findings, this piece of analysis serves to examine the role of the sector's trade association networks, including an analysis of how coordinated lobbying positions amplified influence and reduced transparency in the European Union (EU) regulatory process.

Cross-trade association collaboration

Lobbying on the CSDDD was identified through responses to the European Commission's consultation phases, as well as a limited number of position papers and joint statements. Across the three consultation phases,⁴ 17 metals and mining entities, including two companies and 15

trade associations, were identified as submitting at least one response.⁵ Analysis of submissions to these consultations found a degree of trade association coordination, with similar framing, positions, and overlap in responses to open ended questions. Of the 13 entities that submitted responses to the 2nd phase of the CSDDD consultation,⁶ 11 were found to have instances of duplication in two distinct groups.

The first group, Ceemet, Gesamtmetall, Steelbel, and WSM Wirtschaftsverband Stahl- und Metallverarbeitung e.V. (WSM) all consistently opposed the introduction of an EU mandatory due diligence law across the consultation. In their responses to Q1 and Q2, which asked about the consideration of stakeholder interests and the introduction of mandatory due diligence, all four entities argued that companies already take social and environmental considerations into account on a voluntary basis and that additional regulation was not needed.

This group of trade associations also used identical language in response to Q20a on whether the CSDDD should include directors' duties in relation to consultation channels for stakeholder engagement. All four entities used the quote, "we recognise that consultation of relevant stakeholders is important in the life of companies, but it should be up to the company itself to define which stakeholders are

3 How major metal and mining companies lobbied the CSDDD, EIRIS Foundation, February 2026, <https://sociallobbymap.org/wp-content/uploads/2026/02/SLM-Metal-and-Mining-Report.pdf>

4 There were three European Commission consultation phases titled 'Sustainable Corporate Governance' that ran from 30 July 2020–08 October 2020, 26 October 2020–08 February 2021, and 28 March 2022–23 May 2022 respectively, https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/12548-Sustainable-corporate-governance_en

5 The 17 metals and mining companies that submitted to the EU CSDDD consultation are: Antwerp World Diamond Centre, ArcelorMittal, Ceemet, Cobalt Institute, Eramet, Eurometaux, European Precious Metals Federation, Fachvereinigung Edelmetalle, Gesamtmetall, International Copper Association Europe, International Council on Mining and Metals, International Platinum Group Metals Association, Metallinjalostajat ry, Steelbel, WirtschaftsVereinigung Metalle. e.V., Wirtschaftsvereinigung Stahl, and WSM Wirtschaftsverband Stahl- und Metallverarbeitung e.V.

6 European Commission, Sustainable Corporate Governance, 26 October 2020–08 February 2021, https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/12548-Sustainable-corporate-governance/public-consultation_en.

relevant.”⁷ Further repetition of answers was found throughout the consultation, including Gesamtmetall, Steelbel, and WSM using duplicative language in their responses to Q6, which is also related to directors’ duties and stakeholders’ interests. All three associations responded that “directors’ duties cannot be put on a checklist formula” and Gesamtmetall and Steelbel added that that “any legal consequences attached to this notion would be highly problematic.”⁸ In each of these instances, the entities’ responses were in opposition to the proposed provisions and resulted in negative scores. SLM indicators that capture stakeholder engagement and directors’ duties typically receive very little engagement. However, when looking specifically at the 17 metals and mining entities that engaged on the CSDDD, these four trade associations make up over half of the scores in relation to these.⁹

The connections of these entities are further evidenced from their institutional relationships and partnerships. Ceemet is a European umbrella association for national employer federations, which includes Gesamtmetall. Gesamtmetall is a German metal employers’ federation and has a series of German partner associations, which includes WirtschaftsVereinigung Metalle e.V. (WV Metalle), Wirtschaftsvereinigung Stahl (WV Stahl), and WSM, amongst others. While WV Metalle and WV Stahl were both identified in the SLM’s CSDDD analysis, WV Metalle did not submit to the 2nd phase the EU’s CSDDD

consultation, and WV Stahl was not identified for adopting the same language and answers as the other associations. However, the entity did adopt similar positions, have an overall oppositional score, and lobby against the inclusion of directors’ duties and stakeholders’ interests alongside the other associations. While Steelbel, a Belgian steel association, is not included in this specific national institutional structure, its use of identical consultation language to Ceemet and the German associations suggests additional partnerships.

Overall, Ceemet, Gesamtmetall, Steelbel, and WSM comprise four out of the five lowest scoring metals and mining entities in the analysis, demonstrating that the duplication of positions resulted in the amplification of their opposition.

The second group that was identified to have noticeable overlap in their responses includes the Cobalt Institute, European Precious Metals Federation (EPMF), Eurometaux, Fachvereinigung Edelmetalle (FVEM), International Council on Mining and Metals (ICMM), International Platinum Group Metal Association (IPA), and Metallinjalostajat ry. However, the Cobalt Institute and ICMM showed much more limited instances of overlap with the entities identified for this group, both in number and detail. In contrast to the previous group, these trade associations had a diverse range of scores and positioning, with entities expressing their individual stances on specific topics. For

7 Ceemet, Gesamtmetall and WSM all additionally stated that, “there already exists EU-legislation on the information and consultation of workers. Further new regulations are not needed.” Steelbel similarly added, “specifically on workers, whilst it is important that they have the possibility to be involved in discussions on company strategy [...] there is no need for further EU legal requirements to ensure this.” Gesamtmetall, Steelbel, and WSM also included, “companies already organize the dialogue with their stakeholders using different mechanisms that are suitable to the intended goals: internal, advisory committees, roadshows, direct dialogue, one to one meetings, partnerships, panels... etc.”

8 The full quote from Gesamtmetall and Steelbel reads, “directors’ duties cannot be put on a checklist formula as suggested by the previous two questions but through broad principles that provide flexibility for the company to identify in the present and in the long term which of the stakeholder interests it should consider in accordance with its activity, structure, nature and size. Moreover, it is not reasonable to believe that companies can carry out an exhaustive overview of all their stakeholders’ interests. There is no definition behind “stakeholders” and no reasonable definition can be found due to the specificity of each company’s environment. We strongly believe that any legal consequences attached to this notion would be highly problematic and hazardous for companies.”

9 Directors’ duties and stakeholder engagement are captured through indicators Q1.4 and Q4.1-Q4.5. Across these six indicators, there were 31 evidence items, 18 of which came from the responses of Ceemet, Gesamtmetall, Steelbel, and WSM. For more details on the positions and thematic engagement of these associations, please see *Lobbying imbalance: A sector-wide analysis of mining engagement on the CSDDD*, EIRIS Foundation, February 2026.

example, in response to Q2 on whether the EU should introduce mandatory due diligence, four of the entities showed opposition and had instances of identical language in their responses.¹⁰ Cobalt Institute and ICMM differed from the group and demonstrated their support.¹¹

There were other instances where ICMM supported stronger provisions than the other trade associations. For example, in response to Question 19a, which asked about appropriate enforcement mechanisms, Eurometaux, IPA, and Metallinjalostajat ry all responded that any new due diligence legislation “should be based on efficient, impartial and transparent enforcement mechanisms, in line with policy objectives and goals.”¹² ICMM used a minimal amount of similar language to this response and provided its unique position, calling for much stronger standards – including civil liability provisions.¹³

In contrast to the previous group, these seven entities have varying degrees of overlap amongst their responses.¹⁴ For example, ICMM and the Cobalt Institute had very minimal instances of overlap with the other entities and comprise the two most supportive entities across the metals

and mining analysis, with average organisational scores of 75 and 65 respectively.¹⁵ This demonstrates that these two entities presented their own individual stances when submitting to the consultations. Even amongst the five entities that had the most overlap of language and phrasing (Eurometaux, EPMF, FVEM, IPA, and Metallinjalostajat ry), the average overall consultation scores of the entities ranged from 25 to 50, demonstrating that while the associations duplicated certain responses, this did not result in the same overall positioning across all topics.

The connections between these seven entities are also evident. Through website disclosures, it appears that Eurometaux, the European umbrella association for non-ferrous metals, is the central connection of the network, having the most direct partnerships. However, there is a series of additional partnerships, as shown below, which encompass international, European, national, and commodity specific trade associations. While these seven entities are less clearly organised in a top-down structure like the previous group, their networks are vast and heavily interconnected.

10 In response to Q2, instances of duplication in oppositional responses appeared in two groups: Eurometaux, IPA, and Metallinjalostajat ry; and EPMF, FVEM, and IPA.

11 Cobalt Institute and ICMM also had a slight instance of duplication in their responses to Q2, with Cobalt Institute responding, “We urge that any legal framework that is put in place adds value in terms of impact to people and planet, and does not introduce new standards or processes which may conflict with or duplicate internationally accepted standards or existing/emerging legislation.” and ICMM responding, “ICMM is supportive of an EU legal framework so long as it adds value in terms of impact to people and planet and does not introduce new processes which may conflict with or duplicate well established standards and legislation in supplier jurisdictions.”

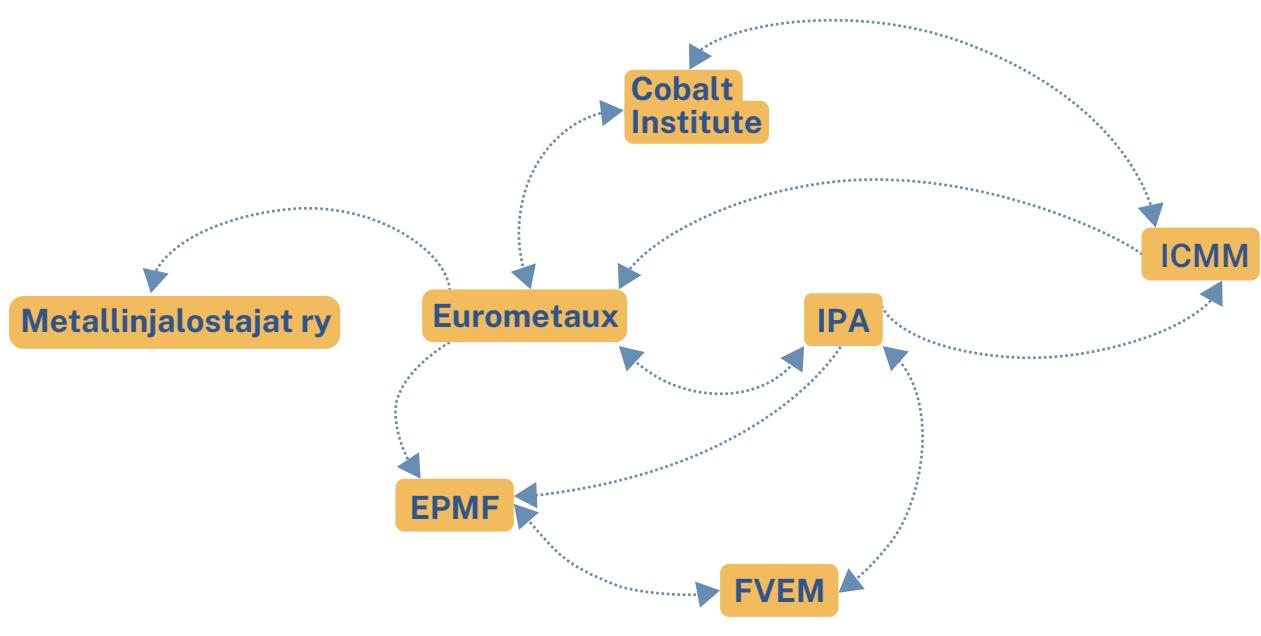
12 The full quote used by all three entities reads that any new due diligence legislation, “should be based on efficient, impartial and transparent enforcement mechanisms, in line with policy objectives and goals. The EU should particularly aim to avoid creating an administrative burden on European companies which might reduce their incentive to produce or deal with products containing the concerned minerals, or lead to their withdrawal from the market and replacement by companies from other regions that are not bound by similar regulations.”

13 ICMM’s response to question 19a states that any EU legal framework, “should include an efficient, impartial, proportionate and transparent enforcement mechanism, with the Court of Justice being the guarantee for law enforcement...”

14 In addition to the previous examples, instances of duplication were present across other open-ended questions. Eurometaux and Metallinjalostajat ry submitted similar responses to questions 3, 14, 15, and 16; EPMF, FVEM, and IPA submitted similar responses to questions 3, 14, 17a, and 18. However, overlaps extended beyond these groupings – for instance, Eurometaux’s responses also overlapped with EPMF, FVEM, and IPA, with duplication among these entities varying by question. This is not an exhaustive list of examples.

15 For an explanation of scores and SLM’s methodology, please see “Table 2: Key LobbyMap Metrics”, The LobbyMap Methodology, Influencemap, lobbymap.org/briefing/LobbyMap-Methodology-24422. While Influencemap scores entities in relation to climate and environmental policies, SLM uses the same methodology but applies it to social policy and standards.

[Trade association partnerships identified from website disclosures]¹⁶



Overall, despite instances of duplication, this group of trade associations demonstrated the ability to put forward unique positions where necessary to show greater support for the CSDDD. ICMM and the Cobalt Institute provide good examples of how collaborating within your sectoral networks does not have to result in adopting the exact same positioning, maintaining the ability to call for stronger standards.

Position papers and joint statements

In addition to submitting responses to the EU's CSDDD consultation phases, four of the overall 17 metals and mining entities were also found to have published public position or joint statements. Ceemet, Eurometaux, EPMF, and WV Stahl all published at least one company specific position paper, while Ceemet and Eurometaux also signed joint letters with other non-mining specific industry bodies. However, this is still a lower level of public engagement than other sectors that have been previously analysed by SLM and none of the joint letters

were metals and mining specific. Rather, the letters covered a variety of entities ranging from finance, electronics, chemicals, food and beverage, consumer goods, and cross-sectoral associations. This is unique from the approach of some other sectors who engaged in sector-coordinated joint letters and demonstrated a united approach to lobbying.¹⁷ Despite evidence that the metals and mining trade associations have connected networks and worked together to shape their consultation responses, none of them signed on to the same joint letters or put forward a public sector-specific position.

EU Transparency Register meetings

In addition to submitting responses to the formal EU consultations, some entities were also identified to have held meetings with the European Commission on the topics of due diligence, the CSDDD, and Omnibus. The main report captures individual meetings that were held by the Cobalt Institute, EPMF, Eurometaux, International Copper Association Europe and WV

16 The direction of the arrow indicates which entity identifies the other as a partner in their disclosures.

17 See for example the analysis of the food products sector, which conducted coordinated lobbying primarily through public joint statements that were led by the Voice Network and Cocoa Coalition: The lobbying effect: How corporate influence shaped the EU's sustainability Omnibus proposal, EIRIS Foundation, September 2025, <https://sociallobbymap.org/wp-content/uploads/2025/09/EIR03-Omnibus-Document-v2.pdf>

Metalle;¹⁸ however, there was a further meeting held jointly by Eurometaux, Umicore, and WV Metalle¹⁹ in March 2021, with Umicore not having submitted to the CSDDD consultation. This example further demonstrates a collaboration of metals and mining entities in their lobbying activities and shows that while some entities did not submit individual responses to the EU consultation, they were still engaging with policymakers.

18 See above, note 3, pg 25.

19 All three entities have a meeting recorded as “Due diligence” in their EU Transparency Register profiles on the same date (19 March 2021) and with the exact same Commission representatives.

■ Conclusion

Altogether, the lobbying by metals and mining entities on the CSDDD was amplified through multiple trade associations presenting the same positions in their formal consultation responses. While it is common practice for networks and partners to share consultation responses, the strongest instances of duplication identified were linked to unsupportive and oppositional positions on due diligence standards. Thus, this alignment and repetition intensified lobbying aimed at the weakening of human rights obligations.

The approach of these metals and mining entities differs from that of the other sectors assessed by SLM. While some trade associations did publish position papers and sign joint letters, these instances of public engagement were limited and none of the joint letters were metals and mining specific. Rather than publicly presenting a united sectoral position, the metals and mining entities relied heavily on trade associations leading lobbying activities, coordinated EU consultation responses, and closed-door meetings – all of which reduce transparency. This makes it harder for stakeholders to determine how metals and mining trade associations are developing their positions, and for individual member companies to understand what positions are being presented on their behalf. Overall, this opacity makes it significantly more difficult to assess the influence of the sector's lobbying efforts, and to hold individual companies accountable.

To overcome these barriers, greater transparency is needed around how metals and mining trade association positions are developed and coordinated. Trade associations should disclose when lobbying positions and consultation responses are developed jointly with other associations, as well as improve transparency around meetings held with policymakers. This could include publishing meeting minutes, further details on discussions had, and positions put forward. These steps would help ensure that coordination does not misrepresent the variety of positions held by different entities or create a misleading impression of sectoral consensus.

■ Disclaimer

This publication is intended to be for information purposes only and it is not intended as promotional material in any respect. The material is not to be used as investment advice or legal advice, nor is it intended as a solicitation for the purchase or sale of any financial instrument. It should not be taken as an endorsement or recommendation of any particular company or trade association. Whilst based on information believed to be reliable, no guarantee can be given that it is accurate or complete. Trade associations on this report were selected according to their participation on the public consultation phases of the EU Corporate Sustainability Due Diligence Directive (CSDDD) and for representing the interests of the metals and mining sector.

All information used for the analysis of entities in this report, are publicly available information and/or consultation responses to the CSDDD. The findings on this report should not be considered representative of the current position of the entities represented on this report.

Where positions on the proposed legislation are assessed, the assessment follows a set structure which is based on the SLM methodology. The awarding follows a five-point scale of +2, +1, 0, -1, -2 with the higher score being 'strongly supportive' and a lower score 'opposing'. We have informed all entities identified about their inclusion on this analysis. We shared the research findings with the relevant entities (or entities named in this article) and provided them with an opportunity to comment prior to publication.

As part of this process, we informed them that we had identified potential collaboration with other trade associations in their responses to the second phase of the consultation. Not all companies responded within the allotted timeframe. Where responses were received, they were reviewed and, where appropriate, considered in the final analysis. The absence of a response should not be interpreted as agreement or disagreement with the findings. If any entity considers that the information about their organisation is inaccurate or misrepresented, we are willing to revise and update such information after the matter is brought to our attention. Any communication should be sent to us via email to social.lobbymap@eirisfoundation.org.

Company policies, practices, and positions may have evolved since the research was conducted. This assessment does not claim to reflect subsequent developments, changes in strategy, or newly disclosed information beyond the stated research timeframe.

While we strive for accuracy and objectivity while analysing the information, we also acknowledge that the information and materials on this report may contain typos and/or inaccuracies. We reserve the right to correct, change or improve the information and materials without any obligation to notify the entities.

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