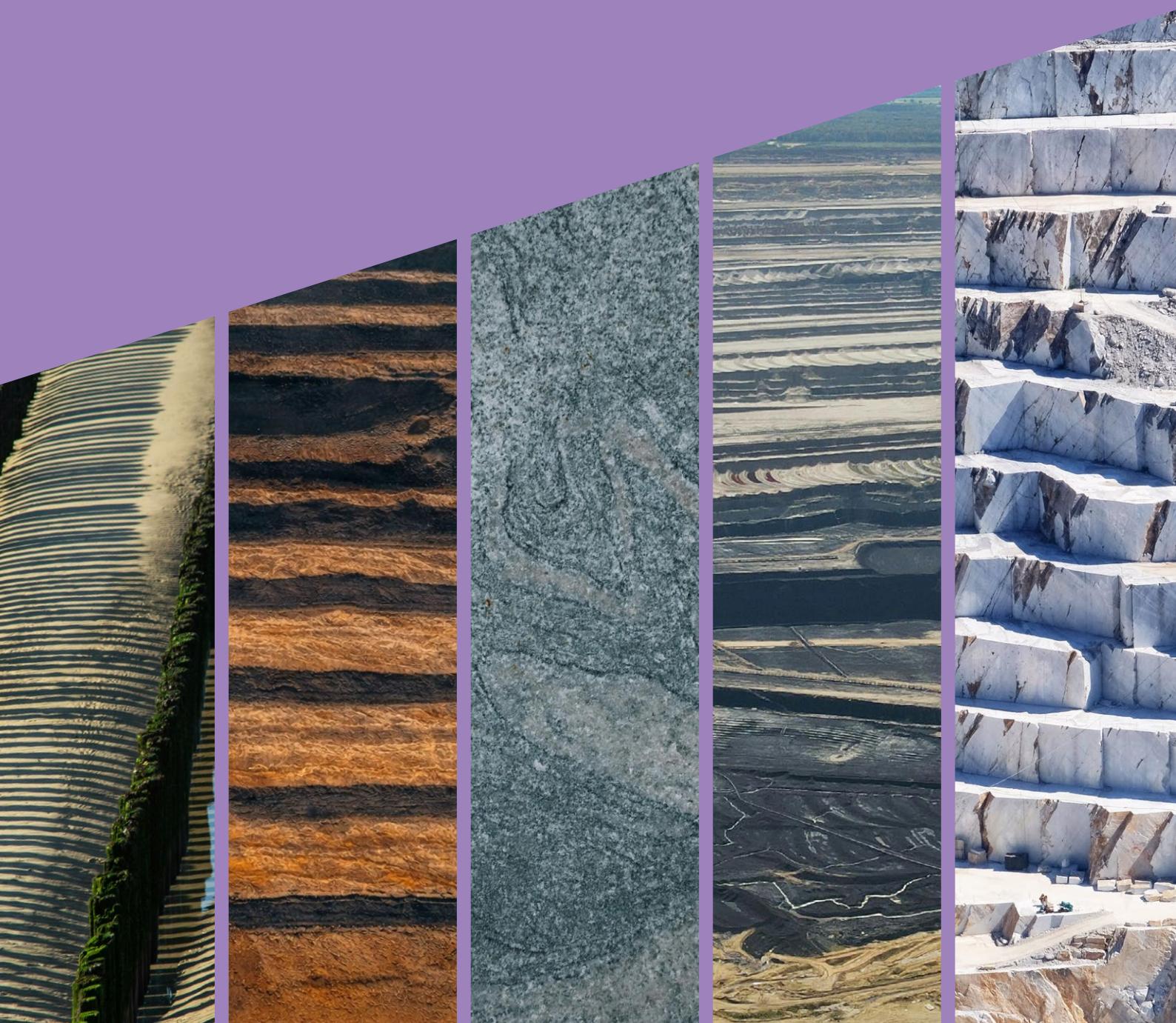


■ Shaping EU Due Diligence:
mining sector lobbying of the CSDDD

Lobbying Imbalance: A sector-wide analysis of mining engagement on the CSDDD



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Lobbying Imbalance: A sector-wide analysis of mining engagement on the CSDDD

Social LobbyMap (SLM) analyses corporate lobbying on human rights legislation aiming to increase transparency and encourage political engagement that supports human rights. This article is part of our research series “*Shaping EU Due Diligence: mining sector lobbying of the CSDDD*” capturing the metals and mining sector’s lobbying on social issues. First, we published “*How major metal and mining companies lobbied the CSDDD*” an analysis of the metals and mining sector based on identified entities that engaged with the at least one phase of the Corporate Sustainability Due Diligence Directive (CSDDD) consultation¹ with ties to the companies included in the PRI Advance Initiative (PRI Advance)². This article expands on the analysis provided in the report examining broader mining sector lobbying patterns and the final publication, “*Coordinated lobbying: How mining trade associations amplified their positions on the EU due diligence directive*”, focuses on trade associations, analysing coordinated lobbying positions and highlighting how collaboration has amplified influence amongst the metals and mining entities assessed.

The PRI Advance initiative represents concentrated investor focus on 24 metals and mining companies. Of the 24 mining companies, 15 were identified as members of at least one trade association from the sector that engaged with the CSDDD legislative process. Only one of the 24 companies, ArcelorMittal, submitted its own consultation response and lobbied directly on the directive. This article positions companies engaged through the PRI Advance Initiative within the wider sector³, assessing an additional five trade associations and one company from the metals and

1 There were three phases of the European Commission’s consultation on Sustainable Corporate Governance, Phase one 30 July 2020-08 October 2020, Phase two 26 October 2020-08 February 2021, and Phase three 28 March 2022-23 May 2022, https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/12548-Sustainable-corporate-governance_en.

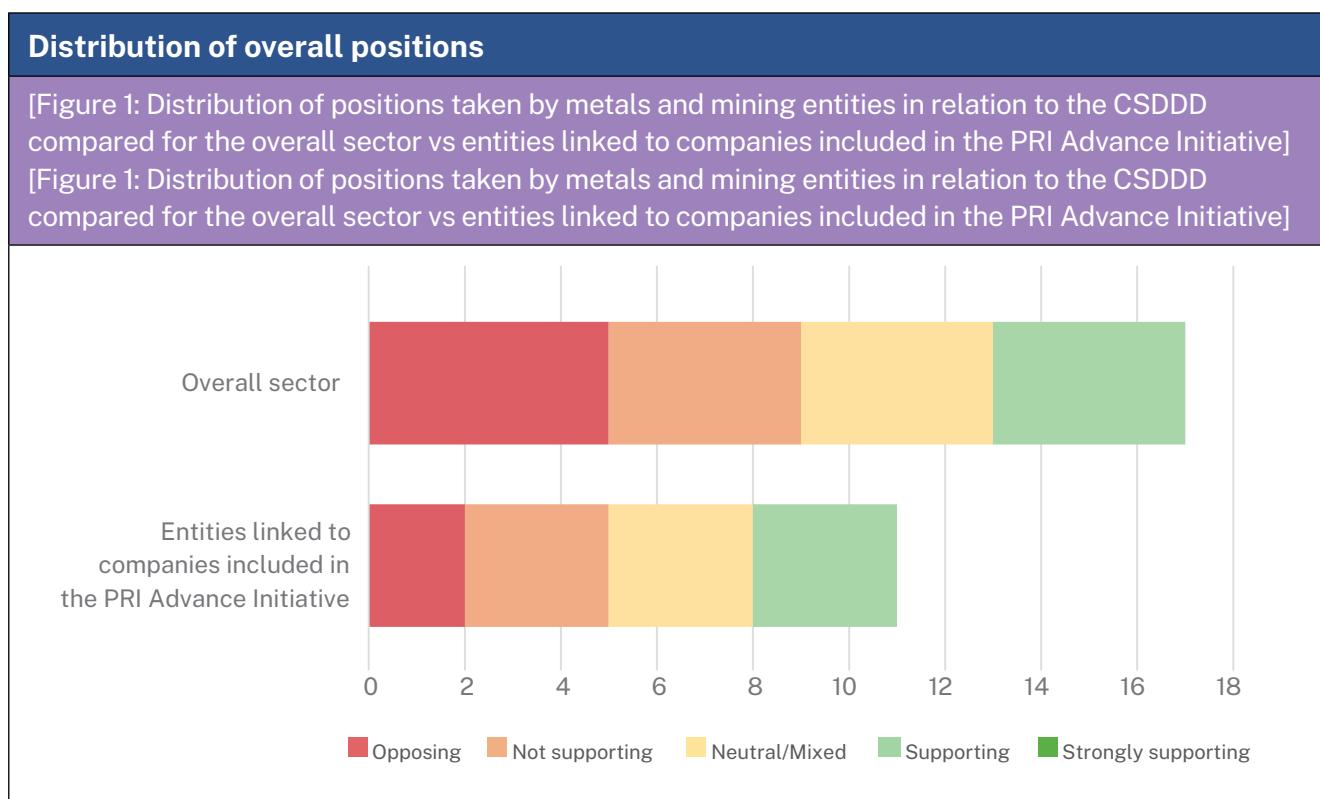
2 For more information on the PRI Advance Initiative: <https://public.unpri.org/investment-tools/stewardship/advance>.

3 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.

mining sector who were identified for their formal lobbying on the CSDDD⁴. In analysing these 17 entities together, a noticeable pattern emerges; trade associations dominate oppositional lobbying, predominantly German and EU-wide ones, while entities with more supportive positions remain largely silent. Moreover, trade associations are overrepresented amongst the metals and mining entities identified; only two companies were identified for their engagement on the CSDDD, with most companies conducting political engagement solely via their trade associations.

In assessing companies selected for PRI Advance in comparison to wider sector entities identified, the analysis also finds that entities with a link to companies engaged through PRI Advance are averaging higher scores than the wider sector. These findings demonstrate a need for both more individual company lobbying to balance corporate views with trade associations', but also a need for companies to leverage their membership influence on trade associations to ensure the incorporation of supportive views. To provide a broader insight into the sectors' positioning and influence, this article outlines trends that appear when these entities are analysed collectively.

General findings



In total 17 entities in the metals and mining sector were identified for their formal lobbying on the CSDDD. The majority of these entities lobbied against the CSDDD, five entities expressed oppositional positions and four expressed non-supportive ones. The average organisational score of the 17 entities is 38, which is an unsupportive score and slightly lower than the average for entities linked to companies included in the PRI Advance Initiative (41)⁵. Of the 17 entities assessed, 11 are German or EU-wide trade associations who were also oppositional in their lobbying – receiving an average

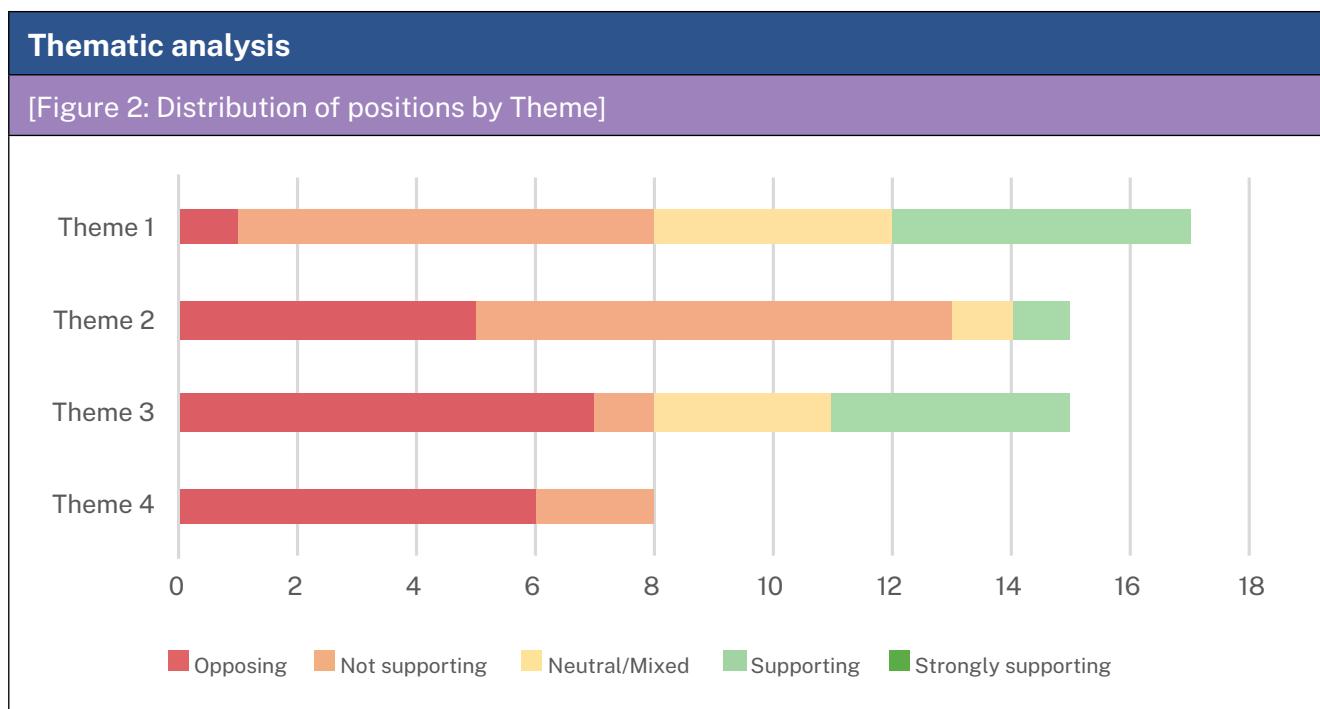
4 The company included is Eramet, and the are Ceemet, Fachvereinigung Edelmetalle, Gesamtmetall, Metallinjalostajat ry -Finnish Steel and Metal Producers, and Wirtschaftsverband Stahl- und Metallverarbeitung e.V. (WSM).

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

score of 30 which is lower than the sector average (38). Majority of the oppositional lobbying came from associations that do not have companies engaged through PRI Advance initiative amongst their memberships, including Ceemet, Gesamtmetall, and WSM. The lobbying of unsupportive entities primarily targeted civil liability, value chain scope, stakeholder engagement, and directors' duties – with the most oppositional positions being amplified through collective lobbying⁶.

Meanwhile, the few supportive entities – primarily those linked to companies included in the PRI Advance Initiative – maintained low engagement intensity and were less vocal in their support for specific provisions and obligations, especially those that were being contested by other entities. ICMM however, despite limited lobbying, did express support for civil liability as a form of enforcement (indicator Q2.5), which received mostly negative lobbying. Due to low engagement from supportive entities, it is more difficult to accurately assess the lobbying of the entities identified in this sector and highlights the imbalance between engagement intensity scores for supportive versus non supportive entities.

Thematic analysis

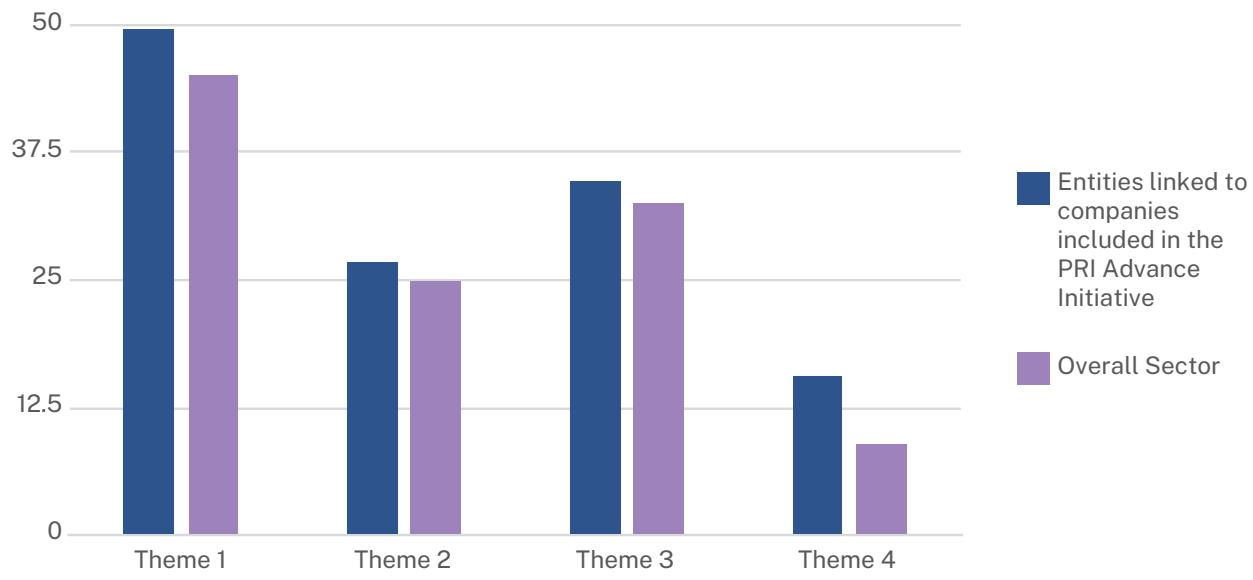


Entities lobbying on CSDDD engaged most on human rights due diligence (Theme 1) and value chain human rights due diligence (Theme 3). Engagement on Theme 1 is divided; five entities held supportive positions, seven non supportive ones, and one opposing, creating an average score that is neutral (45). There were limited responses to or interaction with provisions on both remedy (Theme 2) and stakeholder engagement (Theme 4). For remedy, with the exception of Q2.5 on civil liability, the indicators received limited engagement. The average score across entities for Theme 2 (remedy) is 25 which is a non-supportive score. The same is seen for Theme 4 (stakeholder engagement); however, out of the few entities that did engage on Theme 4, all were either non-supportive or neutral, with no supportive entities across any of the theme's indicators. Some entities (Gesamtmetall and Steelbel) made the argument that there is no definition behind "stakeholders" and thus, "any legal consequences attached to this notion would be highly problematic and hazardous for companies." The average score across entities on stakeholder engagement is the lowest across all the themes and shows strong opposition.

6 For more insight into collective lobbying please refer to Social LobbyMap article *"Coordinated lobbying: How mining trade associations amplified their positions on the EU due diligence directive"* on the EIRIS Foundation website.

Thematic analysis comparison

[Figure 3: Comparison of average theme scores between entities linked to companies included in the PRI Advance Initiative and overall sector]

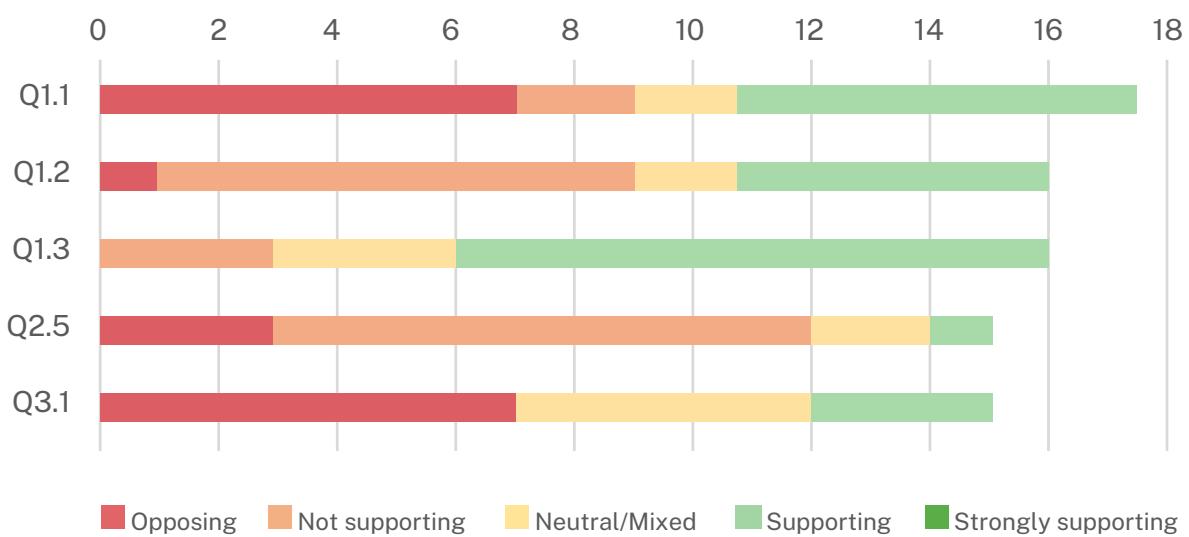


As seen with the indicators that were most engaged with, scores across all themes for entities linked to companies included in the PRI Advance Initiative are higher than the overall sector. Theme 4 has the steepest difference, with the average score of the overall sector being 9 and the average score of entities linked to companies included in the PRI Advance Initiative being 16, which is an oppositional score. This imbalance demonstrates a need for individual companies to ensure supportive voices are more integrated in trade association lobbying.

Indicator analysis

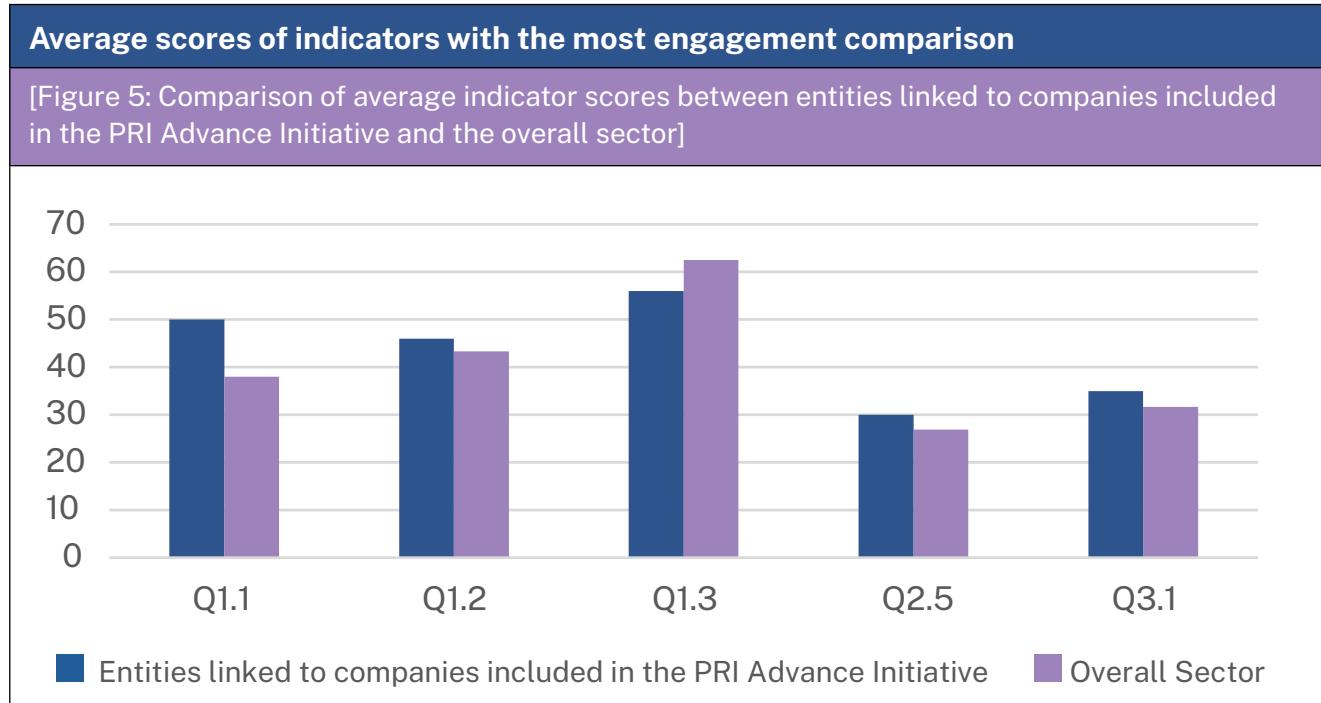
Indicators with the most engagement

[Figure 4: Most engaged indicators and distribution of positions]



When looking at indicators individually the indicators that were most engaged with are:

- Q1.1 (making effective human rights due diligence a legal requirement),
- Q1.2 (requiring human rights due diligence of all companies, regardless of sector and size)
- Q1.3⁷ (implementing an enforcement mechanism), which received the most support (no opposing scores and 10 supportive scores)
- Q2.5 (enabling judicial enforcement with liability and compensation), which received the least support (three opposing scores and 10 non supportive scores), and
- Q3.1 (requiring companies to implement a due diligence process covering their value chain).



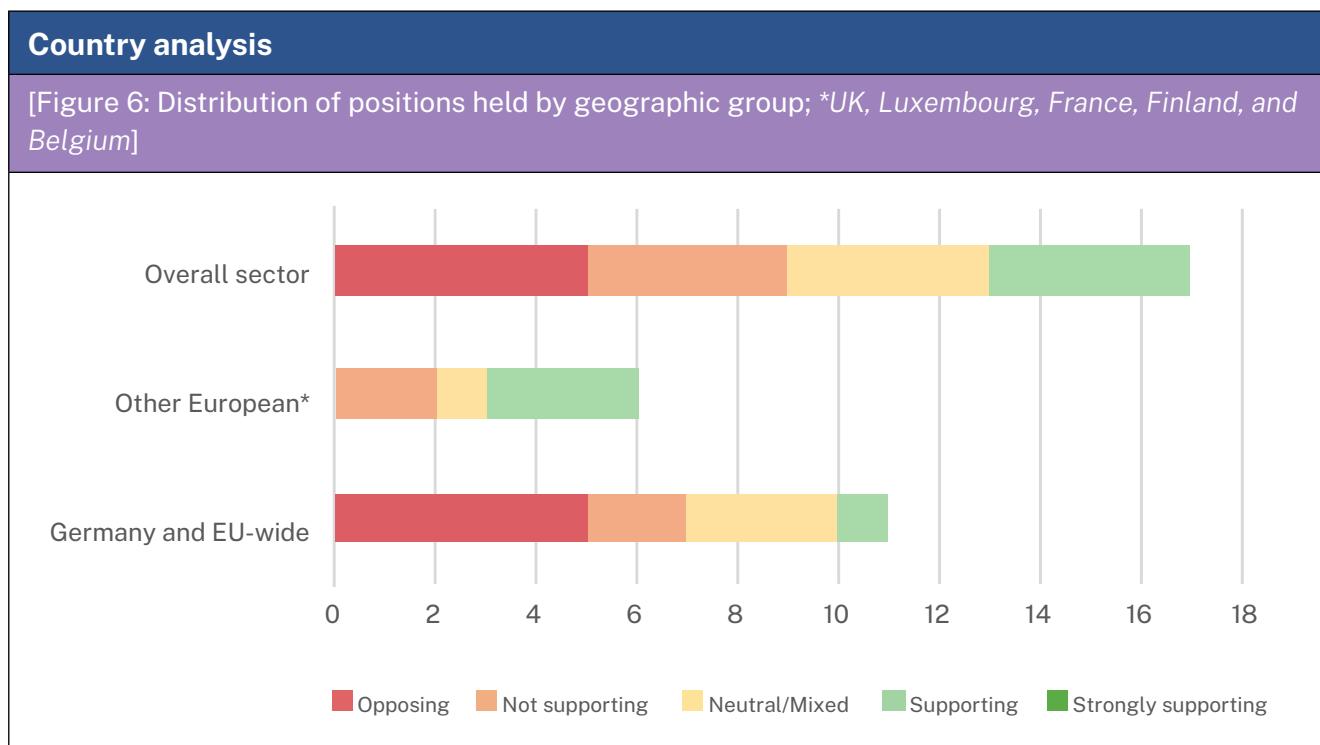
Across indicators that were most engaged with, entities linked to companies engaged through the PRI Advance Initiative received higher scores on average, the only outlier being Q1.3 (implementing an enforcement mechanism).

Positions are most divided on:

- Q1.1 (making effective due diligence a legal requirement), with seven entities receiving opposing scores and six receiving supportive scores,
- Q1.2 (requiring human rights due diligence of all companies, regardless of sector and size), with five entities receiving a supportive score of 75 and nine receiving unsupportive scores of 25 or less (one entity scored 17), and
- Q3.1 (full value chain coverage) with three entities receiving a score of 75 and seven receiving a score of zero.

7 For more insight into collective lobbying please refer to Social LobbyMap article “*Coordinated lobbying: How mining trade associations amplified their positions on the EU due diligence directive*” on the EIRIS Foundation website.

Country analysis

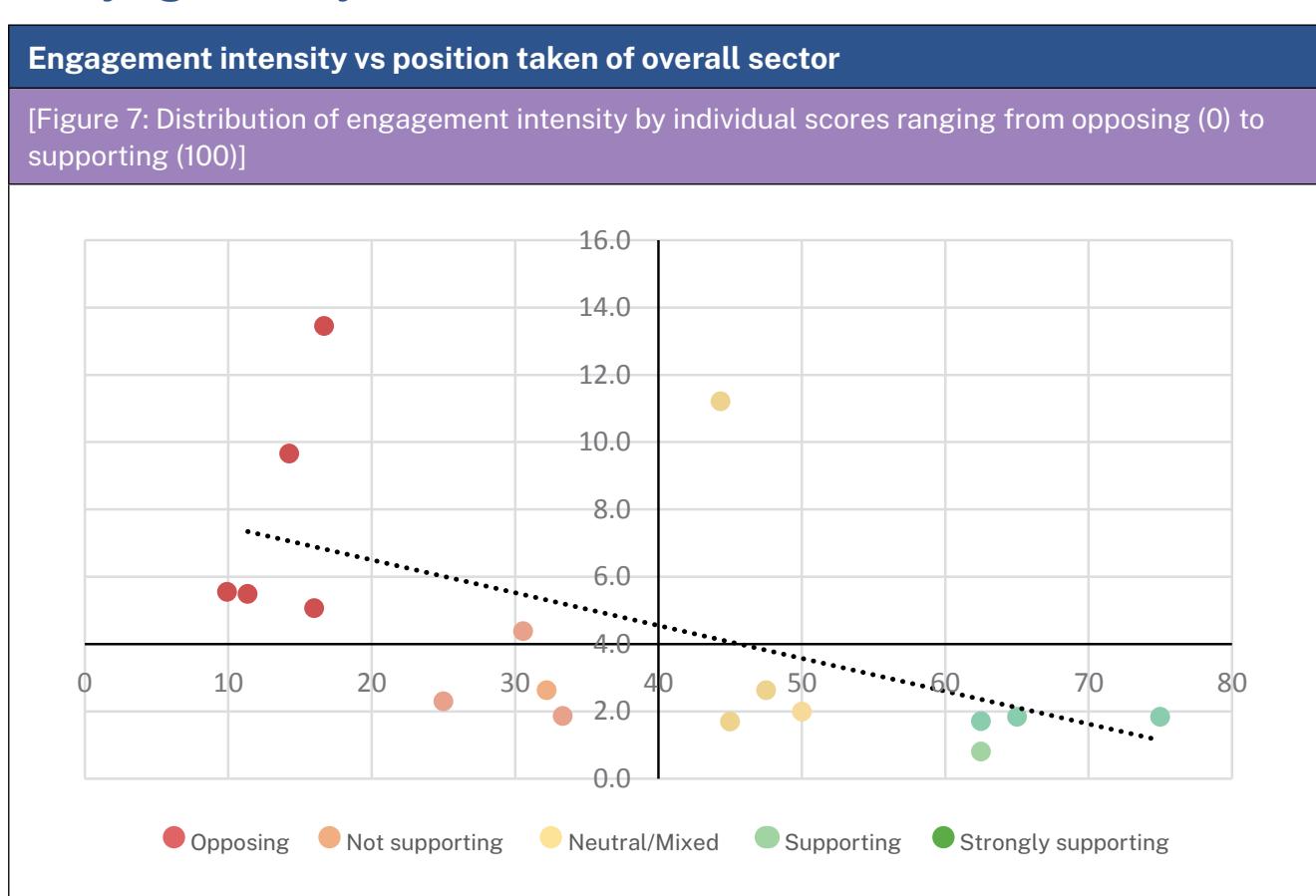


The research demonstrates that most entities assessed (11/17) are German and EU-wide trade associations that largely adopted non-supportive views. The average organisation score across these 11 entities (30) is lower than across the overall sector, with only one entity (International Copper Association) having an overall supportive position. The remaining 10 are either opposed (5), non-supportive (2), or neutral (3). These entities lobbied predominantly on human rights due diligence (Theme 1), with majority non-supportive and neutral scores. The engagement that we did see from these entities on stakeholder engagement (Theme 4) was limited and overwhelmingly non-supportive. For the six European entities that are not German based or EU-wide, which includes the UK, France, Finland, Luxembourg, and Belgium, the findings are generally more positive. The average organisation score is 52 which, despite being a neutral score, is significantly higher than across the overall sector. These entities lobbied mostly in support of human rights due diligence (Theme 1) and have mostly supportive and neutral positions on supply chain human rights due diligence (Theme 3). Of the six entities assessed, only two hold overall non-supportive positions.

Similar opposition was seen amongst EU wide and German trade associations in the sectors covered in previous findings from Social LobbyMap⁸, who held majority non supportive views of the CSDDD. A key discrepancy seen in previous findings was that in contrast to German trade associations German companies held overall supportive positions, yet their lobbying intensity scores were very low (less than one). A similar pattern emerges more broadly in the metals and mining sector entities assessed with lack of independent lobbying amongst the corporate entities identified making it unclear whether trade associations are representing all member views or only the least favourable ones.

⁸ The lobbying effect: How corporate influence shaped the EU's sustainability Omnibus proposal, EIRIS Foundation, Social LobbyMap Project, September 2025, <https://sociallobbymap.org/wp-content/uploads/2025/09/EIR03-Omnibus-Document-v2.pdf>.

Lobbying intensity



Lobbying intensity refers to how actively an entity engages in lobbying, calculated by the number of scored evidence items recorded in the database. SLM tends to exclude entities with an engagement intensity score of less than three from consideration in analyses to avoid misleading results. However, to demonstrate the sector specific findings they are included in this article. Overall, for the metals and mining sector, entities with higher engagement intensity scores were more strongly unsupportive or opposed to the CSDDD, while entities that were more supportive lobbied less actively. This is consistent with previous findings from the Social LobbyMap project⁹, which found that the loudest voices are often the least supportive, leaving supportive positions less visible. For instance, the six highest scoring entities in the present analysis had an overall average supportive organisational score of 60, coupled with a low average engagement intensity score of 1.8. In contrast, the six lowest scoring entities had an overall oppositional organisational score of 15, but a much higher average engagement intensity score of 6.9. The middle five entities had an average organisational score of 37, with an average engagement intensity score of 4.4. However, an outlier to this dataset is Eurometaux with an overall neutral position but a high engagement intensity score of 11.2, boosting the average engagement intensity score of the mid-range entities. Overall, this draws a noticeably clear trend that the entities that have responded more thoroughly to EU consultations and have spoken out publicly on the CSDDD, are those that are the least supportive of strong due diligence standards.

A majority (10/17) of the entities assessed have an engagement intensity score of less than three, which the Social LobbyMap considers to be limited data. The average engagement intensity score

⁹ The lobbying effect: How corporate influence shaped the EU's sustainability Omnibus proposal, EIRIS Foundation, Social LobbyMap Project, September 2025, <https://sociallobbymap.org/wp-content/uploads/2025/09/EIR03-Omnibus-Document-v2.pdf>.

for the metals and mining sector entities assessed is four, which makes it the least engaged sector of those assessed for the Social LobbyMap project; apparel has an engagement intensity score of seven, cross-sectoral trade associations is 10, and food products, finance, energy, oil and gas all have seven each¹⁰. While entities from other sectors engaged with a lot more frequency and consistency throughout the CSDDD's legislative process and the Omnibus debate, most metals and mining sector entities seemed to limit their input to the official consultation. The entities may have engaged with policymakers through other channels; however, these activities do not provide enough publicly available information to be scored in line with the methodology.

10 The lobbying effect: How corporate influence shaped the EU's sustainability Omnibus proposal, EIRIS Foundation, Social LobbyMap Project, September 2025, <https://sociallobbymap.org/wp-content/uploads/2025/09/EIR03-Omnibus-Document-v2.pdf>.

■ Conclusion

The metals and mining sector entities assessed are as a whole predominantly oppositional and primarily target civil liability, value chain scope and directors' duties. German and EU-wide trade associations are disproportionately represented in the non-supportive scores and entities linked to companies engaged through the PRI Advance Initiative associated entities averaged higher scores than the overall sector.

In comparison to other sectors SLM has assessed, the metals and mining entities are overall less engaged when it comes to the CSDDD, with non-supportive entities lobbying more intensely than their supportive counterparts. Political engagement is also increasingly outsourced to sector-specific trade associations creating uncertainty around whether corporate commitments are consistent with the lobbying practices of their trade associations. This is coupled with companies potentially feeling less incentivised to publicly state their individual positions whilst also diluting positive positions they might share due to the membership choices. These practices result in a disproportionate representation of trade association and non-supportive engagement on due diligence standards amongst the entities identified.

Some trade associations are also quieter on certain issues meaning some provisions are less represented during engagement. Notably, companies engaged through the PRI Advance Initiative, which are chosen by the PRI Advance initiative due to their relevance for the sector (among other criteria), tend to be members of trade associations that received higher scores. While these trade associations claim to be representing the sector, their low engagement activity carry less weight, as opposed to some non-supportive entities that do not have the support of the companies engaged through the PRI Advance Initiative.

Entities should be more transparent about their positions, especially where they are supportive, not only to improve transparency and ensure alignment between trade association positions and companies' values but also to ensure that supportive voices are more visible in the mining sector lobbying landscape.

■ 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. Companies and 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). A further group was selected according to their selection by the PRI Advance Initiative and identified membership links to these companies as well as participation in at least one of the three official public consultation phases on the EU Corporate Sustainability Due Diligence Directive (CSDDD), either made directly by the entities or by signing joint letters.

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.

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 also shared the research results and gave them an opportunity to comment prior to publication. 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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