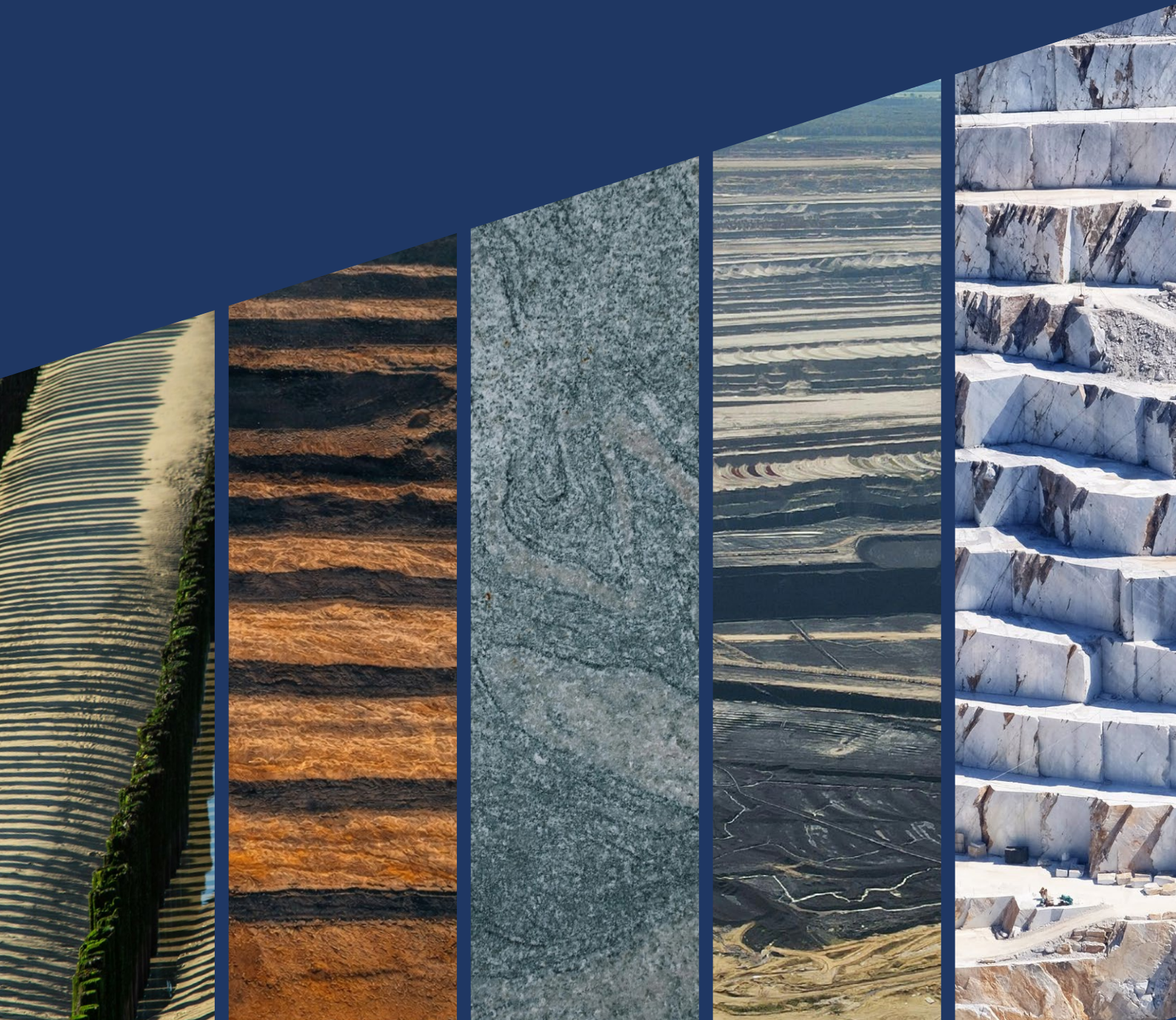


Shaping EU Due Diligence:
mining sector lobbying of the CSDDD

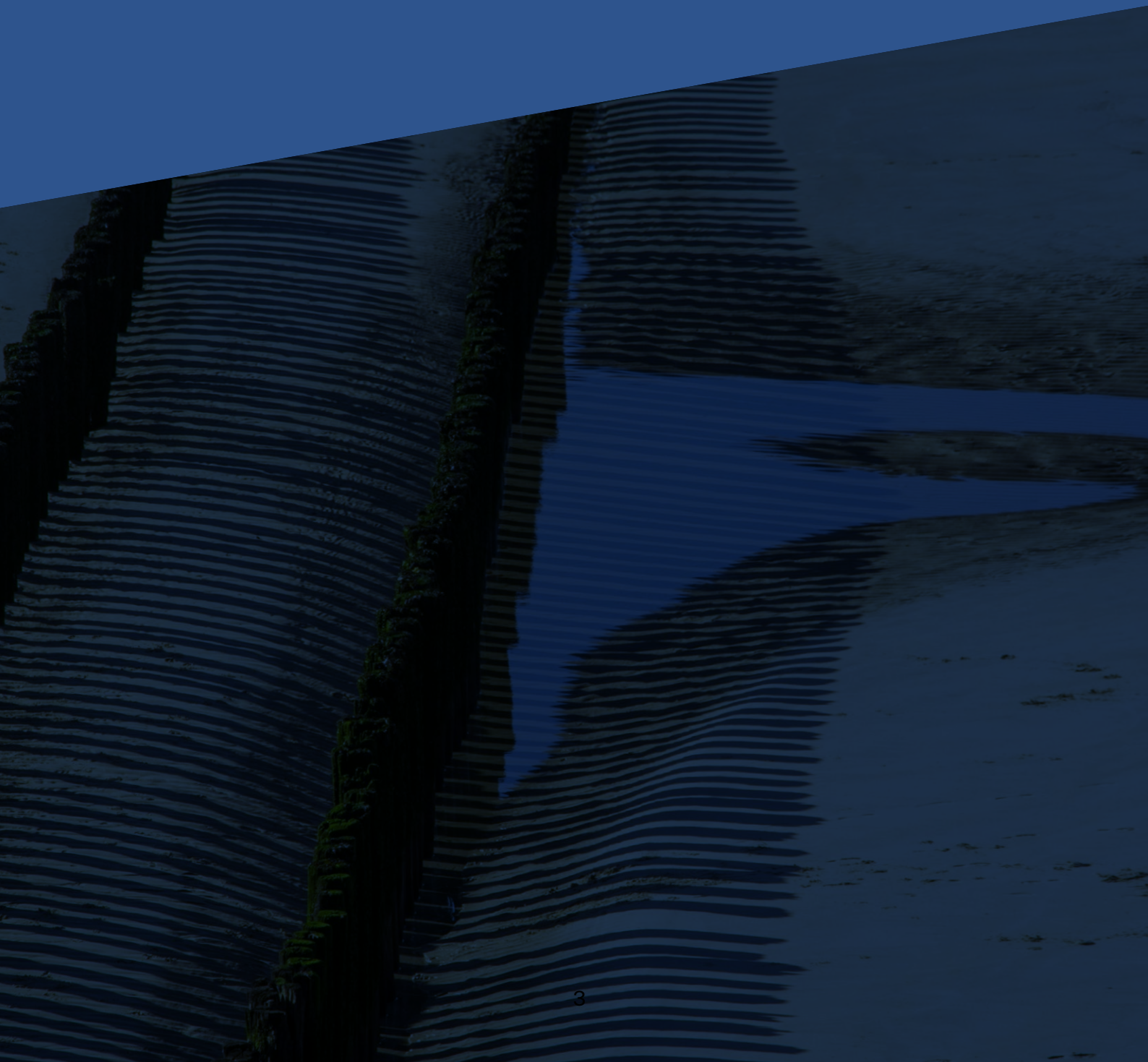
How major metal and mining companies lobbied the CSDDD



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■ Introduction



■ Introduction

This report examines lobbying activity by the 24 metals and mining companies included in the Principles for Responsible Investment (PRI) Advance initiative and their trade associations on the European Union's Corporate Sustainability Due Diligence Directive (CSDDD). It provides evidence-based analysis to support investor stewardship and engagement with these high-risk companies, enabling investors to assess whether corporate lobbying activities align with stated human rights commitments and investor expectations.

This report is the flagship publication in a three-part research series examining metals and mining sector lobbying on assessed companies from an investor stewardship perspective.¹ A second short publication examines broader mining sector lobbying patterns and influence mechanisms and a third explores how trade associations coordinate and amplify lobbying

activity, often with limited transparency. Together, these publications tell a coherent story about how influence is exercised in practice within the metals and mining sector.

Within the PRI Advance initiative, engagement has been ongoing with 24 metals and mining companies² selected for their high-risk human rights profile, potential for investor leverage, and strategic importance to the global energy transition.³ As institutional investors increasingly prioritise human rights due diligence and corporate accountability, understanding how investee companies engage with social regulation — both directly and through trade associations — has become essential for effective stewardship. This analysis provides investors with the evidence needed to engage companies on potential misalignments between corporate commitments and lobbying practices, and to assess material governance and regulatory risks arising from sectoral lobbying activity.

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- 1 “Advance is a PRI-led collaborative stewardship initiative on human rights and social issues. The initiative was launched in December 2022 with the objective to support institutional investors in protecting and enhancing risk-adjusted returns by advancing progress on human rights through investor stewardship.” About the initiative, Principles for Responsible Investment, <https://public.unpri.org/investment-tools/stewardship/advance>.
 - 2 The 24 PRI Advance Metals & Mining companies at the time of this publication include: Alcoa, Anglo American, AngloGold Ashanti, Antofagasta, ArcelorMittal, Barrick, BHP, Buenaventura, China Shenhua, Coal India, First Quantum, Freeport-McMoran, Glencore, Gold Fields, Grupo Mexico, Lundin Mining, Newport, Nippon Steel Corporation, Peñoles, POSCO, Rio Tinto, Teck Resources, Vale and Zijin.
 - 3 For an overview of the PRI Advance sector and company selection methodology, please see Advance: a stewardship initiative for human rights and social issues, https://dwtyzx6upklss.cloudfront.net/Uploads/q/h/j/advance_methodologyforsectorandcompanyselection_163637.pdf.

Social LobbyMap (SLM) aims to increase transparency and analysis around lobbying activities in the context of human rights and labour standards. The project closely follows Influence Map's approach to analysing corporate lobbying on climate policy, but focuses specifically on corporate engagement with human rights legislation. SLM assesses lobbying against international standards including the United Nations Guiding Principles on Business and Human Rights (UNGPs) and related policies. Previous SLM analyses examined CSDDD lobbying by the financial, apparel, (renewable) energy, and utilities sectors, as well as cross-sectoral lobbying on the European Commission's Omnibus I proposal.⁴ This report extends that analytical framework to the metals and mining sector.

Scope and approach

Of the 24 PRI Advance metals and mining companies engaged through the PRI Advance initiative, 15 were identified as members of at least one trade association from the sector that engaged with the CSDDD legislative process. Only one company, ArcelorMittal, submitted its own consultation response and lobbied directly on the directive. The remaining companies' positions are assessed based on their relationships with 10 metals and mining trade associations that actively engaged on at least one phase of the European Commission's CSDDD consultation process. This report assesses the public lobbying positions of those 11 entities (10 trade associations and one company).

The analysis employs the Social LobbyMap methodology,⁵ which combines quantitative and qualitative research to score lobbying statements against international human rights standards. Individual evidence items – including consultation responses, public statements, and other documented lobbying activities – are scored on a five-point scale ranging from -2 (opposing) to +2 (strongly supporting). These scores are then aggregated to provide indicator, thematic, and entity-level assessments. The

methodology's structure allows for both granular analysis of specific issues (such as value chain coverage or civil liability provisions) and comprehensive assessment of overall positioning on the directive.

While the primary focus is CSDDD lobbying, this report also examines three case studies of mining sector lobbying on other human rights legislation in Brazil, Australia, and Zambia. These case studies provide important context for understanding the sector's broader approach to social regulation, particularly given that assessed entities demonstrated relatively limited engagement on the CSDDD compared to their documented engagement on other legislative files. The case studies illustrate how mining companies and their trade associations have lobbied on Indigenous peoples' rights, labour rights, and rights to community participation in national contexts.

Why mining, why now

The metals and mining sector presents a unique combination of high human rights risks, significant financial and political resources, and strategic importance to the global energy transition. The sector has long been associated with adverse impacts on Indigenous peoples, workers, and local communities, making effective human rights due diligence particularly urgent. At the same time, demand for critical minerals continues to intensify as countries pursue decarbonisation strategies, increasing both the sector's influence and the stakes of regulatory decisions. While previous Social LobbyMap research examined other sectors' CSDDD engagement, the mining sector's lobbying on social legislation has been understudied despite its documented influence on national and regional policy. The PRI Advance initiative provides a natural focus for investor-oriented analysis, as these 24 companies represent the sector's largest players and those deemed most critical for investor stewardship on human rights.

4 For a full list of Social LobbyMap project reports, please see the bottom of our "About" page: <https://sociallobbymap.org/about/>.

5 Access the full methodology here: <https://sociallobbymap.org/wp-content/uploads/2025/06/Assessment-methodology.pdf>.

Key Findings

The research reveals several important patterns in how PRI Advance metals and mining companies engage with social regulation:

Trade associations dominate public lobbying.

Lobbying by metals and mining entities on the CSDDD was conducted almost exclusively through trade associations rather than by individual companies. Only one company engaged by PRI Advance, ArcelorMittal, submitted its own consultation response. Some companies state in their disclosures that they conduct political engagement primarily or exclusively through trade associations (Grupo Mexico indicates full reliance on trade associations; Antofagasta, Glencore and Lundin Mining indicate to be relying heavily on them), yet few publish assessments of alignment between their own positions and those of their associations. This creates a transparency gap that makes it difficult to determine whether trade association positions reflect the views of their memberships or represent the lowest common denominator over more progressive voices.

Companies engaged by the PRI Advance initiative tend to be members of more supportive trade associations. Of the 15 assessed companies linked to trade associations that lobbied on the CSDDD, the majority (10 out of 15) have relationship scores indicating overall support for the directive, while four have neutral scores and only one is oppositional. The trade associations with the highest number of PRI Advance memberships — the International Council on Mining and Metals (ICMM) with 13 companies, International Copper Association (ICA) Europe with nine companies, and Eurometaux with five companies — all have neutral to supportive organisational scores (75, 63, and 44 respectively). This suggests that the most prominent industry associations representing companies selected for engagement by the PRI Advance Initiative take relatively constructive positions on mandatory human rights due diligence.

A small number of PRI companies are members of not-supportive trade associations. Anglo American, Glencore and ArcelorMittal were identified as members of at least one trade association that held not-supportive or even opposing positions on the CSDDD. For Anglo American and Glencore, membership to International Platinum Group Metals Association (IPA) and Wirtschaftsvereinigung Metalle e.V., respectively, is in contrast to their five other, more neutral or supportive memberships. ArcelorMittal, on the other hand, was found to have links to only two trade associations, both of which opposed the CSDDD.

Significant transparency gaps exist. Individual companies disclose limited information about their lobbying activities, political contributions, trade association memberships, and the positions taken by their associations. While some companies disclose annual membership fees (which can exceed one million Euros to individual associations) and list association memberships, very few publish assessments of alignment between their own commitments and trade association lobbying (ArcelorMittal, Alcoa, Anglo American, BHP, Glencore, Rio Tinto and Newmont). Where such assessments exist, they focus primarily on climate and environmental policy with minimal consideration of social or human rights positioning. Only Anglo American specifically states a mapping of both climate and social indicators. Alcoa does not specify while Glencore indicates a review regarding positions on just transition. Additionally, the specific example of the CSDDD shows how several companies ([Anglo American](#), [Glencore](#), [Teck Resources](#), and [Rio Tinto](#).) list the CSDDD under their targeted EU legislative proposals on their EU Transparency Register profiles despite not submitting consultation responses, suggesting monitoring or engagement that cannot be publicly assessed. This lack of transparency makes it difficult for investors and other stakeholders to assess whether corporate commitments are consistent with lobbying practices.

Support varies significantly by provision.

While entities showed strong support for making human rights due diligence a legal requirement (Q1.1) and implementing enforcement mechanisms (Q1.3), they were much less supportive of other provisions. Company scope (Q1.2) received moderate support. Civil liability (Q2.5) was supported only by ICMM, while eight of the 11 assessed entities lobbied against it. Similarly, comprehensive value chain coverage (Q3.1) received limited support. ICMM, Cobalt Institute and Fachvereinigung Edelmetalle (FVEM) being the only entities supporting this issue. Engagement on stakeholder participation requirements (Theme 4) was limited and predominantly negative. These patterns reveal that even relatively supportive entities often oppose the most substantive accountability mechanisms.

Engagement intensity was below average.

Compared to previously assessed sectors, metals and mining entities demonstrated lower levels of engagement with the CSDDD legislative process. Most lobbying activity was limited to consultation responses rather than the sustained, multi-channel engagement observed in other sectors. Notably, entities with more supportive positions tended to lobby less actively — the five highest-scoring entities had an average engagement intensity score of 1.9, while the five lowest-scoring entities averaged 4.8. This pattern of ‘quiet support and loud opposition’ leaves supportive voices less perceptible in the policy debate.

Significant lobbying occurs behind closed doors.

EU Transparency Register⁶ data reveals that several entities held meetings with European Commission officials on the CSDDD, indicating lobbying activity beyond public consultation responses. The Cobalt Institute, European Precious Metals Federation, and Wirtschaftsvereinigung Metalle all met

individually with the Commission on ‘Sustainable corporate governance,’ while Eurometaux and ICA Europe held meetings on Omnibus.

The sector actively lobbies other social

legislation. While CSDDD engagement was limited in comparison to other sectors analysed by SLM, case studies reveal significant mining sector lobbying on other human rights legislation. In Brazil, trade associations with members including Alcoa, Anglo American, AngloGold Ashanti, ArcelorMittal, BHP, Lundin Mining, Rio Tinto, and Vale lobbied on legislation affecting Indigenous peoples’ rights to veto mining on their land. In Australia, the Minerals Council of Australia (members include BHP, Rio Tinto, and subsidiaries of Anglo American, AngloGold Ashanti and Glencore) campaigned against ‘Same Job, Same Pay’ labour rights legislation. In Zambia, the Zambia Chamber of Mines and Association of Zambian Mineral Exploration Companies (including First Quantum, Barrick, and Anglo American) opposed provisions strengthening local participation and community rights. These cases demonstrate that limited CSDDD engagement does not reflect limited capacity or interest in influencing social regulation.

Recommendations for Investor Stewardship

These findings have important implications for investors engaged with assessed companies and the broader metals and mining sector.⁷ The PRI Advance Initiative is endorsed by more than 250 investors with assets of \$35 trillion who expect companies to align their political engagement with their responsibility to respect human rights.⁸ We set out below practical steps that these and other like-minded investors can take to act on that expectation.

The dominance of trade association lobbying, combined with limited transparency

6 The EU Transparency Register can be accessed here https://transparency-register.europa.eu/search-register-or-update/search-register_en.

7 The PRI Advance Initiative lists metals and mining companies as one of three targeted sectors and ‘political engagement’ as one of the high-level objectives that underpin the initiative: <https://public.unpri.org/investment-tools/stewardship/advance/objectives>.

8 Advance: a stewardship initiative for human rights and social issues, Investor statement, https://dwtyzx6upklss.cloudfront.net/Uploads/w/x/y/advance_investorstatement_17may2022_339587.pdf.

about association positions and alignment assessments, creates material governance risks. Investors cannot reliably assess whether investee companies' lobbying activities undermine their stated human rights commitments when most political engagement occurs through opaque association channels.

The pattern of supportive companies lobbying less visibly than oppositional ones means that positive voices within the sector are underrepresented in policy debates. This can lead to regulatory outcomes that do not reflect the actual positions of the sector's largest and most responsible companies. Investors have a role to play in encouraging companies with supportive positions to engage more actively and publicly, particularly on contested provisions like civil liability and value chain coverage where supportive voices are most needed.

The case studies of lobbying in Brazil, Australia, and Zambia demonstrate that companies' approach to social regulation extends beyond single jurisdictions or legislative files. Investors should assess lobbying practices holistically, examining companies' engagement on Indigenous rights, labour standards, and rights to community participation across all operating contexts.

1. **Investors should require transparency from companies on their direct and indirect lobbying activities.** Where companies indicate a specific piece of legislation as being of particular interest or even 'targeted', investors should seek disclosures from those companies as to what their positions and lobbying activity is. This should include asking about lobbying activities conducted by trade associations of the companies. This can increase transparency and further the investors' understanding of the companies' positions and values.
2. **Investors should explore whether their investee companies are supporting the positions taken and promoted by their trade associations.** Companies should be able to demonstrate that they are aware of the positions taken by their trade associations and whether these align with the companies' own values. As demonstrated above only seven companies (ArcelorMittal, Alcoa, Anglo American, BHP, Glencore, Rio Tinto

and Newmont) disclose having conducted at least one alignment mapping of their trade associations. However, most of them (ArcelorMittal, BHP, Rio Tinto and Newmont) reviewed alignment with climate-related values only, leaving social and human rights lobbying unassessed. Only Anglo American specifically states a mapping of both climate and social indicators. Alcoa does not specify while Glencore indicates a review regarding positions on just transition. This means **17 of 24 analysed companies** (71%) disclose no alignment assessment at all, and **22 of 24** (92%) have not assessed association alignment on social and human rights lobbying specifically. As companies in the metals and mining sector rely heavily on trade associations for lobbying activity, investors should encourage companies to regularly review the alignment of the positions their trade associations take on policy with their own values on both climate and social issues. Where companies are already reviewing their trade associations for climate alignment, investors should work with these companies to extend this to cover social and human rights related lobbying.

3. **Where companies are members of more than one industry body, investors should explore inconsistencies in the positions taken by these.** As demonstrated on the cases of Anglo American and Glencore, companies can be members of both supportive and not-supportive or even opposing trade associations. Investors should ask companies what they have done to explore these inconsistencies and what steps they have taken to potentially address those.
4. **Where companies are not aligned with the positions taken by their trade associations, investors should work with them on ways to make this known to policymakers and the trade associations in question.** Companies should be able to demonstrate the steps they have taken in order to communicate their own views and values where they differ from those promoted by the trade association. An example of this can be seen in a statement of the European Roundtable for Industry (ERT) on the Omnibus I proposal where companies including Nestlé, Unilever, and L'Oréal insisted

on including caveats to demonstrate their own positions.⁹ They specified their individual company position, making sure that their support for the CSDDD was not watered down. Not a single PRI Advance mining company has publicly differentiated from an association position, despite several belonging to associations that took oppositional or non-supportive positions. Investors should work with companies in enabling such communications. If the misalignment continues or worsens, investors should ask what steps the companies have taken to challenge the positions of the trade association internally as well as what escalation strategies are in place where efforts are met with limited results.

5. **Where investors find that the positions of the trade association are aligned with a company's values they should work with the company on how to amplify these positions.** Social LobbyMap research shows consistently that supportive positions on the CSDDD were presented with less persistent engagement. Investors should ask companies what steps they are taking in ensuring the positions of their representatives are heard by policymakers.
6. **Investors should consider engaging directly with trade associations.** A number of trade associations analysed in this research have wider numbers of PRI Advance metals and mining companies as their members. **ICMM has 13 PRI Advance members and an organisational score of 75 (supportive); ICA Europe has 9 PRI Advance members with a score of 63 (supportive). Both associations showed very low engagement intensity despite supportive positions.** Investors should engage directly with these trade associations to explore ways of amplifying their positions against those of more oppositional industry bodies to ensure regulatory outcomes that reflect the actual positions of the sector's largest and most responsible companies.

Report Structure

This report is structured in four main sections. The first section provides an overview of the metals and mining sector's lobbying capabilities, including financial resources, political access, and documented influence over regulatory outcomes. This context helps explain how the sector is positioned to shape policy debates on human rights due diligence.

The second section presents detailed analysis of companies' lobbying on the CSDDD, including their relationships with trade associations, thematic patterns of engagement, and lobbying intensity. This section includes both quantitative scoring based on the Social LobbyMap methodology and qualitative assessment of positioning and transparency practices.

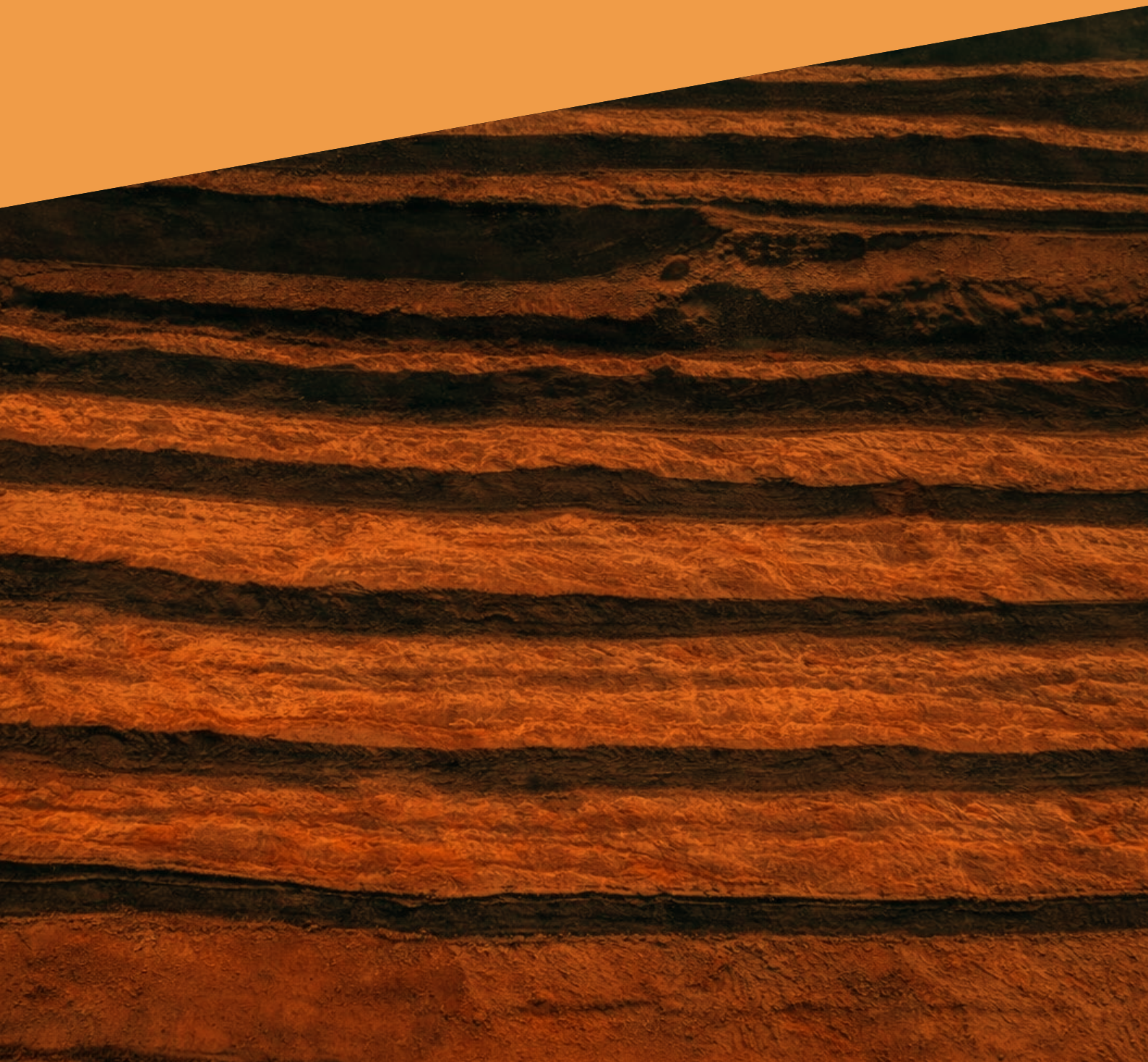
The third section examines three case studies of mining sector lobbying on social legislation in Brazil, Australia, and Zambia. These cases illustrate how companies and trade associations engage with Indigenous rights, labour standards, and rights to community participation in national contexts, providing important perspective on the sector's broader approach to human rights regulation.

The concluding section synthesises findings and provides recommendations for investor engagement, including specific actions investors can take to encourage greater transparency, more active support for progressive provisions, and better alignment between corporate commitments and lobbying practices. A detailed methodology section is provided as an appendix for readers seeking technical information about the scoring approach and data sources.¹⁰

9 European Round Table for Industry (ERT), Reducing the reporting burden in the EU, January 2025, https://ert.eu/wp-content/uploads/2025/01/ERT-Reducing-the-reporting-burden-January-2025-Final_V2.1.pdf.

10 The full methodology and additional information on the scoring can also be found on the Social LobbyMap website, <https://sociallobbymap.org/methodology/>.

Overview of metals and mining sector lobbying



Overview of metals and mining sector lobbying

Corporate lobbying is not specific to the metals and mining sector, but the industry is in a unique position given the strategic relevance of minerals, their global and cross-border investment implications, and comprehensive industry and trade association networks. The metals and mining sector has long been considered high-risk with regards to human rights meaning that there is a significant need to regulate its corporate activities that have resulted in adverse human rights impacts.¹¹ Further, the importance of the mining industry and need for legislation have continued to heighten in recent years, with new minerals being labelled as ‘critical’ for global energy supplies and the ‘green transition’.

This section provides an overview of the ways in which the metals and mining sector is able to mobilise its lobbying activities to effectively influence law and policy. Through financial spending and political access, companies and

associations — including those who are included in the PRI Advance list of companies — are able to influence legal standards both within their headquartered states and abroad.

Sector spending and formal lobbying

The mining sector generates substantial revenue globally. In 2024, Glencore was the world’s leading mining company by annual revenue, earning nearly EUR 193 billion.¹² In 2025, the top 40 mining companies, which represent the majority of the industry and includes 16 of the assessed companies, are estimated to have a combined annual revenue of approximately EUR 725 billion.¹³ These figures provide context to the sectors’ access to financial resources that can be mobilised for lobbying activity.

For example, Friends of the Earth reported that in the EU, mining, metals, and minerals companies and their lobby groups, including companies

11 Mining of metals & minerals: A rapid assessment, Ethical Trading Initiative, October 2024, https://www.ethicaltrade.org/sites/default/files/shared_resources/Mining%20of%20metals%20%26%20minerals%2C%20ETI_0.pdf.

12 <https://www.statista.com/topics/1143/mining/#topicOverview>, original source stated USD 230 billion; converted from USD to EUR using the exchange rate on 30 January 2026.

13 <https://www.statista.com/topics/1143/mining/>, original source stated USD 863 billion; converted from USD to EUR using the exchange rate on 30 January 2026. For a full list of the top 40 global mining companies and revenue forecasts, see Appendix I and Appendix II of PwC’s *Mine 2025: Concentrating on the future* report: <https://www.pwc.com/kz/en/publications/mine/mine-2025-eng.pdf>.

selected for engagement by PRI Advance Anglo American and Rio Tinto, spent over EUR 21 million annually on lobbying related to *Critical Raw Materials Act*.¹⁴ This expenditure supported activities such as hosting sponsored events and holding nearly 1,000 meetings with senior officials at the European Commission. The report also notes that nine raw mineral companies (including Rio Tinto and Anglo American) together spent nearly EUR 3 million on lobbying in Brussels, and that the European Association of Mining Industries, Metal Ores & Industrial Minerals (EUROMINES), of which Rio Tinto and Anglo American are also members, reported an annual lobbying expenditure of EUR 1 million.

In Australia, a 2017 report found that mining lobby groups spent over EUR 318 million¹⁵ in the past 10 years on lobbying the national government.¹⁶ Of this, the Minerals Council of Australia was the highest funded mining lobby group in Australia, with a revenue of over EUR 120 million.¹⁷ Several of the companies assessed for this report are members of this association, including Anglo Gold Ashanti, BHP and Rio Tinto. These cases demonstrate how a limited number of actors with access to significant financial resources are able to mobilise lobbying efforts on social and environmental policy that effects a variety of stakeholders..

Since much of the metals and mining sector is owned by institutional investors it is important for those investors to be aware of how their money is being used, and for companies to be transparent about their lobbying expenditure

and activities. Increased disclosure can help to improve accountability and ensure that corporate practices are aligned with stated policies and investor expectations.

Political access

Access to senior policy makers can be significant tool in influencing law and regulations, with varying levels of access across stakeholder groups. A 2018 research study from the Grattan Institute in Australia found that business interests held more meetings with senior ministers than community groups,¹⁸ and another study indicates that businesses with the “most to win or lose”¹⁹ from government policy decisions get more meetings with senior ministers and make the most use of commercial lobbyists. In Queensland Australia, where the mining industry makes up approximately 11% of the state economy, the sector accounted for around 20% of all lobbying contacts with state governments.²⁰ Such levels of political influence are often facilitated through the use of commercial lobbyists and trade associations that engage directly with governments. These patterns highlight an unbalanced approach to the voices that are prioritised when developing legislation that impacts various stakeholders.

In Canada, companies engaged by PRI Advance Rio Tinto, Vale, and Glencore recorded a combined total of over 60 meetings with government officials in July 2025 alone.²¹ There is a lack of public information around what is discussed during meetings. While

14 Mining the depth of influence – How industry is forging the EU Critical Raw Minerals Act, July 2023, <https://friendsoftheearth.eu/wp-content/uploads/2023/07/Mining-the-depths-of-influence.pdf>.

15 Original source stated AUD 541 million; converted from USD to EUR using the exchange rate on 30 January 2026.

16 Undermining our democracy: Foreign corporate influence through the Australian mining lobby, September 2017, <https://australiainstitute.org.au/report/undermining-our-democracy-foreign-corporate-influence-through-the-australian-mining-lobby/>.

17 Original source stated AUD 203 million; converted from USD to EUR using the exchange rate on 30 January 2026.

18 Who’s in the room? Access and influence in Australian politics, September 2018, <https://grattan.edu.au/wp-content/uploads/2018/09/908-Who-s-in-the-room-Access-and-influence-in-Australian-politics.pdf>.

19 Punching above their weight”: the power of mining lobbyists in Queensland, Mine Australia, November 2019, https://mine.nridigital.com/mine_australia_nov19/punching_above_their_weight_the_power_of_mining_lobbyists_in_queensland.

20 See note 19.

21 Lobbying Landscapes in Mining, August 2025, <https://queenstreetanalytics.org/lobbying-landscapes-in-mining-august-2025/>.

some departments publish information on the participants and general topics for the meetings; detailed records or minutes are not disclosed. This lack of transparency makes it challenging to draw direct connections between individual companies, the position advanced by them, or the outcome of such engagements. As a result, this limits the ability of stakeholders, including investors, to assess how companies' lobbying activities align with their responsibility to respect human rights.

Influence over legal and regulatory standards

A 2009 example from Canada demonstrates that political influence by the mining sector is not a new phenomenon. Canada had proposed a *Corporate Accountability of Mining, Oil or Gas in Developing Countries Act*, referred to as Bill C-300, which aimed at enhancing human rights and environmental responsibilities on mining companies operating abroad.²² The bill was narrowly defeated. Subsequent investigation into the voting records and federal registry of lobbyists found that 24 opposition Members of Parliament (MPs) – which included parties generally in favour of the bill – were absent from the final vote.²³ Of these, nine had held dozens of meetings over the past year with several mining companies and industry associations, including Prospectors and Developers Association of Canada, Goldcorp Inc., Vale Canada Inc., Iamgold

Corp., the Mining Association of Canada, Stillwater Mining Company and Xstrata Nickel.²⁴

At the EU level, the *Critical Raw Materials Act*, as previously mentioned, has had significant lobbying influence from the mining sector. Research indicates that corporate influence took place in the EU's consultation questions and outcomes, this included the concept of companies being able to “override public interests” for strategic projects and prioritise voluntary certifications over mandatory human rights due diligence obligations.²⁵

Companies also use their lobbying efforts to secure greater protection and access for their own mining projects; particularly when the mining operations are opposed by local community groups or Indigenous peoples, or when they are contested due to serious environmental concerns. This can be seen in the cases of legal “loopholes”²⁶ in the Indian Coal Mines Act and explicit exceptions for mining giant Adani Group;²⁷ companies BHP and Rio Tinto lobbying the United States government²⁸ and Supreme Court²⁹ in order to secure the land rights for the Resolution Copper Mine; Adani Group further lobbying in Australia to secure government approval for its controversial Carmichael mine;³⁰ and Vale lobbying local administrations in Brazil to loosen regulation regarding ecological licensing in the years before the devastating Brumadinho tailings dam collapse in Minas Gerais in 2019 that killed over

22 <https://openparliament.ca/bills/40-3/C-300/>.

23 Action Alert: show your support for Canadian Corporate Accountability for Human Rights Violations and Environmental Degradation, November 2010, <https://canadians.org/analysis/action-alert-show-your-support-canadian-corporate-accountability-human-rights-violations/>.

24 Ethical mining bill defeated after fierce lobbying [Canada], October 2021, <https://www.business-humanrights.org/en/latest-news/ethical-mining-bill-defeated-after-fierce-lobbying-canada/>.

25 See above, note 14.

26 ‘Loopholes’ were left in amended coal mines law to favour Adani group: Congress, March 2023, <https://economictimes.indiatimes.com/news/politics-and-nation/loopholes-were-left-in-amended-coal-mines-law-to-favour-adani-group-congress/articleshow/98342627.cms>.

27 Modi govt allowed Adani coal deals it knew were ‘inappropriate’, March 2023, <https://www.aljazeera.com/economy/2023/3/1/modi-govt-allowed-adani-coal-deals-it-knew-were-inappropriate>.

28 BHP and Rio Tinto lobby Donald Trump over US copper mine after new delay, August 2025, <https://www.ft.com/content/f01a2a75-ee6e-4078-9e5f-3fafdb6b806f>.

29 US Supreme Court clears way for Rio Tinto's Resolution copper mine, May 2025, <https://www.ft.com/content/a00699ed-2427-4c0a-bfd4-911d486bea6b>.

30 See above, note 19.

300 people. The director of Vale held closed-door meetings with members of the administration, which were reviewed by investigative journalists of Reporter Brasil.³¹

These examples of companies lobbying against social regulation to protect their own operations, at the risk of adverse human rights impacts, are relevant for investors; both in terms of whether investee companies are abiding by their own corporate policies, as well as whether the companies' activities align with investor objectives and expectations. Additional case studies of corporate lobbying of mining regulations will be detailed later in the report.

Foreign and cross-jurisdictional influence

As mining projects and operations are international in nature, so are the mining sector's lobbying activities. In some national contexts, many mining lobby groups are dominated by foreign corporations, giving them the ability to use their diplomatic, trade, or investment channels to influence domestic regulation. This is the case in Australia for instance, where the decision-making bodies of leading sectoral lobby groups are predominately representatives from companies headquartered abroad. In 2017, both of the boards of the Minerals Council of Australia and the Queensland Resources Council had 10 out of their 14 respective positions occupied by foreign owned companies, giving them a dominant say in Australia's mining lobbying positions and activities.³²

We can also see instances where foreign companies are active in lobbying in relation to national legislation or policies in the countries that they are operating in, rather than solely within their own headquartered governments. In Mexico, the national government introduced reforms to the country's mining code in 2023 that establishes Free, Prior and Informed Consent as a prerequisite to mining concessions and requires companies to restore the land once their projects close.³³ In response, mining companies challenged the reforms with over 500 *amparos*, which are a legal mechanism used to challenge unlawful actions that are in violation of constitutional rights, submitted by both national and foreign companies.³⁴ Further, some Canadian mining company representatives openly warned about consequences of the new reforms.³⁵

31 Vale dictated rules to simplify environmental licensing in Minas Gerais, February 2019, <https://reporterbrasil.org.br/2019/02/vale-ditou-regras-para-simplificar-licenciamento-ambiental-em-mg/>.

32 See above, note 16.

33 Mexico approves mining reforms to protect environment, Indigenous people, May 2023, <https://news.mongabay.com/2023/05/mexico-approves-mining-reforms-to-protect-environment-indigenous-people/>.

34 Mining Companies Have Filed 500 Aparos Against Mining Law, October 2023, <https://mexicobusiness.news/mining/news/mining-companies-have-filed-500-amparos-against-mining-law/>.

35 Mexican mining industry under threat from sweeping new regulations, June 2023, <https://www.ft.com/content/5424e057-e0bf-42eb-907e-af63683452a9/>.

Analysis of major metals and mining companies' lobbying on the CSDDD

Analysis of major metals and mining companies' lobbying on the CSDDD

The Corporate Sustainability Due Diligence Directive (CSDDD) is a European Union law aimed at requiring due diligence from companies to foster responsible corporate behaviour and prevent adverse human rights and environmental impacts. The Directive originally entered into force in July 2024, following a polarised debate. However, following the provisional agreement of the Omnibus simplification package, the scope and certain provisions of the CSDDD are likely to be significantly reduced.³⁶ Under the agreement, company size thresholds would increase, the EU-level civil liability regime would be removed, and stakeholder engagement requirements may be narrowed to a more limited set of affected groups.

This section provides an analysis of lobbying around the CSDDD by the metals and mining companies included in the PRI Advance Initiative and trade association that are linked to those companies through memberships, focusing on thematic patterns of engagement as well as lobbying intensity. The entities were primarily assessed based on their responses to at

least one of the three phases of the CSDDD consultation; however, the research also draws on other publicly available data aimed at shaping the legislative process. This analysis can contribute to engagement and stewardship of these companies with regards to their direct and indirect lobbying activity.

Trade associations are leading public lobbying activities

The analysis of corporate engagement on the CSDDD found that lobbying by metals and mining entities was conducted primarily through trade associations, rather than by individual companies. This is consistent with previous research findings through the SLM project, as well as the policies and disclosures of individual companies.

Many of the companies analysed are either not disclosing their lobbying activities or, at most, publishing corporate policies and procedures on how they conduct political engagement without providing details on topics or positioning. In terms of government elections, there is a divide between some companies that have policies prohibiting

³⁶ European Parliament, Simplified sustainability reporting and due diligence rules for businesses, December 2025, <https://www.europarl.europa.eu/news/en/press-room/20251211IPR32164/simplified-sustainability-reporting-and-due-diligence-rules-for-businesses>.

making direct payments to individual political candidates or parties,³⁷ and others that allow political contributions to candidates, parties, and organisations “whose views and actions may support the company’s business goals”.³⁸

Many companies state in their disclosures that rather than conducting individual political engagement, they lobby primarily, or exclusively, through their trade associations, using collective dialogue to influence regulatory change. Only some companies disclose which trade associations they are members of and how much they pay in membership fees, which can be over a million Euros a year to individual associations.³⁹ A single company can belong to dozens or even hundreds of trade associations, leveraging their influence at local, national, regional, and international levels.⁴⁰ Despite this reliance on trade associations to conduct their lobbying, only a very limited number of metals and mining companies publish assessments on the alignment between themselves and some of their associations, with limited information being disclosed in relation to those assessments or the direct outcomes.⁴¹ Furthermore, the majority

of policies considered in these alignment assessments focus on climate and environmental policy, with very limited consideration of social or human rights positioning.⁴² This raises concern around whether the narrative and positioning of the mining sector’s association lobbying on social issues are reflective of the majority of its members, or rather, represent the lowest common denominator and leave the more progressive positions less visible.

37 See for example the company policies and disclosures of [Anglo American](#), [BHP](#), [Glencore](#), [Lundin Mining](#), [Teck Resources](#), and [Vale](#).

38 Quote from [Newmont’s Policy Influence Disclosure](#), 2024. Some other mining companies that allow political donations, in accordance with local laws, include AngloGold Ashanti, [First Quantum](#), and Rio Tinto. AngloGold Ashanti [passed a new resolution](#) in its [2025 Annual General Meeting](#) to allow the company and any of its subsidiaries to make political donations up to £100,000. Similarly, Rio Tinto passed in its [2025 Annual General Meeting](#) to allow the company and any of its subsidiaries to made donations to political parties, independent candidates, or political organisations up to £50,000 per company, and up to £100,000 across the Group.

39 [Anglo American](#) and [Glencore](#) disclose information on the trade associations that they pay more than USD \$100,000 in annual fees to. [Rio Tinto](#) discloses its top five association fees. All three companies have trade associations that they pay over EUR 1 million to on an annual basis. This is not an exhaustive list of Assessed companies’ membership fee disclosures.

40 [Anglo American](#), [BHP](#), and [Glencore](#) all disclose being members of over 130 mining sector trade associations. This is not an exhaustive list.

41 See the industry association review of [Anglo American](#).<https://www.bhp.com/iar2025https://www.glencore.com/.rest/api/v1/documents/static/82cbd29c-53ef-4bb9-a56e-2ded9292fb83/GLEN-2024-Review-of-our-Direct-and-Indirect-Advocacy.pdf> The company sets out a clear process for handling misalignment, including engagement and possible termination of membership. Anglo American discloses its associations that it currently has material misalignments with. However, based on its high number of association memberships, the company was not able to review all their associations and have selected a limited scope.

42 [Alcoa](#), [ArcelorMittal](#), [BHP](#), [Glencore](#), [Newmont](#) and [Rio Tinto](#), https://corporate.arcelormittal.com/media/41dbfuem/arcelormittal-industry-association-report-addendum.pdfhttps://www.bhp.com/-/media/documents/ourapproach/operatingwithintegrity/industryassociations/241129_industryassociationdisclosure2024.pdf also conducted alignment assessments in relation to their associations, but this was either exclusively in relation to climate (BHP, Newmont and Rio Tinto), only covered social elements by way of just transition (Glencore), or was not specified (Alcoa).

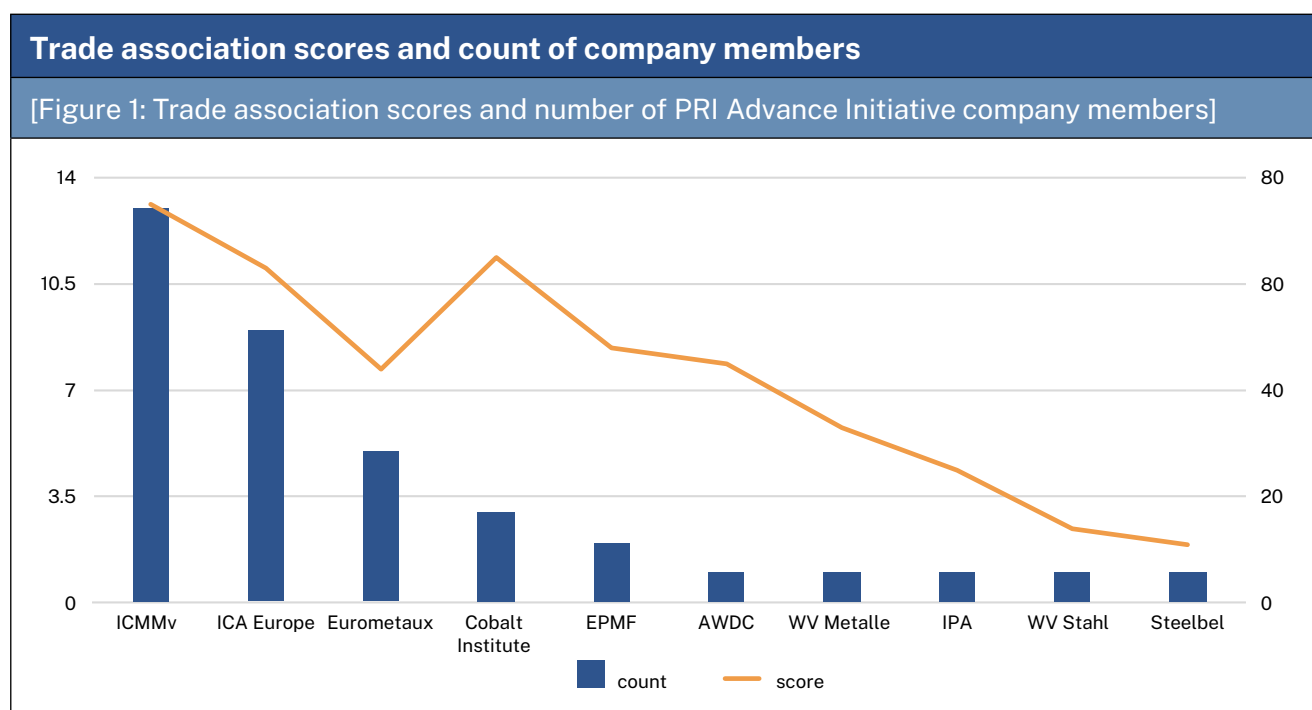
Lobbying of trade associations with analysed company members

| Table 1: Companies and their memberships in trade associations from the metals and mining sector] | | | |
|---|--------------------------------|----------------------------|-------------------------------|
| Company | Member of | Score of trade association | Relationship score of company |
| AngloGold Ashanti | ICMM | 75 | 75 |
| Barrick | ICMM | 75 | 75 |
| BHP | ICMM | 75 | 75 |
| Gold Fields | ICMM | 75 | 75 |
| Antofagasta | ICMM | 75 | 69 |
| | ICA Europe | 63 | |
| Freeport-McMoRan | ICMM | 75 | 69 |
| | ICA Europe | 63 | |
| Newmont | ICMM | 75 | 69 |
| | ICA Europe | 63 | |
| Teck Resources | ICMM | 75 | 69 |
| | ICA Europe | 63 | |
| Grupo Mexico | ICA Europe | 63 | 63 |
| Vale | ICMM | 75 | 62 |
| | Cobalt Institute | 65 | |
| | ICA Europe | 63 | |
| | Eurometaux | 44 | |
| Alcoa | ICMM | 75 | 60 |
| | Eurometaux | 44 | |
| Rio Tinto | ICMM | 75 | 58 |
| | ICA Europe | 63 | |
| | AWDC | 45 | |
| | Eurometaux | 44 | |
| Anglo American | ICMM | 75 | 55 |
| | Cobalt Institute | 65 | |
| | ICA Europe | 63 | |
| | EPMF | 48 | |
| | Eurometaux | 44 | |
| | IPA | 25 | |
| Glencore | ICMM | 75 | 47 |
| | Cobalt Institute | 65 | |
| | ICA Europe | 63 | |
| | EPMF | 48 | |
| | Eurometaux | 44 | |
| | Wirtschaftsvereinigung Metalle | 33 | |
| ArcelorMittal | Wirtschaftsvereinigung Stahl | 14 | 13 |
| | Steelbel | 11 | |

Of the 24 PRI Advance metals and mining companies, 15 were identified as being a member to at least one metals and mining association that contributed to the CSDDD legislative process. The majority (10/15) have relationship scores⁴³ that were supportive of the CSDDD, while four were neutral, and one was oppositional. Only two companies, ArcelorMittal and Glencore, were identified as being members of sector-agnostic trade associations that are included in the SLM database. Based on these

additional memberships that are not captured in the chart above, ArcelorMittal and Glencore have overall SLM relationship scores of 24 and 47 respectively. Further, one company engaged by PRI Advance, POSCO, was not identified as a member to any of the metals and mining specific trade associations that lobbied on the CSDDD but is a member of the Korea Business Association Europe and thus has an SLM relationship score of 22 (not included in the chart above).

Most prominent associations and their companies



- The trade associations with the most assessed company memberships are International Council on Mining and Metals (ICMM) (13 companies), International Copper Association (ICA) Europe (nine companies), and Eurometaux (five companies). These associations have respective organisational scores of 75, 63, and 44. Based on the research findings, demonstrated in Figure 1, the trade associations with the highest number of assessed company memberships tend to take supportive or neutral positions in relation to human rights legislation such as the CSDDD. In contrast, trade associations with oppositional or less supportive positions tend to have limited company membership.
- The assessed companies with the highest number of memberships to metals and mining associations that were assessed in relation to the CSDDD are Anglo American and Glencore (six associations each), followed by Rio Tinto, and Vale (with four associations each). The respective relationship scores for these companies are 55, 56, 58, and 62 – demonstrating overall neutral and supportive positions.
- There is identifiable overlap between the most common trade associations and companies, as all four of the above companies are members of ICMM, ICA Europe, and Eurometaux. Further,

⁴³ For more information on how relationship scores are calculated, please consult the Annex.

three out of four (Anglo America, Glencore, and Vale) are also members of the Cobalt Institute, which received an organisational score of 65 and sits with ICMM and ICA Europe as the top three scoring, and only supportive, trade associations across the CSDDD analysis.

- The clear network of these companies and associations, along with their status or 'systemic importance' as PRI puts it, represents the significant influence that these entities can have through lobbying on behalf of the metals and mining sector.

Assessed companies with the highest relationship scores

- The four highest scoring entities (AngloGold Ashanti, Barrick, BHP and Gold Fields) all have a relationship score of 75. This is based on the companies only having membership to one of the assessed associations, ICMM.
- Another four entities (Antofagasta, Freeport-McMoRan, Newmont, and Teck Resources) all have a relationship score of 69 based on their memberships to ICA Europe and ICMM.
- Overall, of the 15 analysed companies, 12 held association memberships that were entirely neutral or supportive.

Companies with unsupportive or oppositional association memberships

- In contrast, there were three companies, Anglo American, ArcelorMittal and Glencore, that hold memberships to associations that were unsupportive of the CSDDD. Anglo American is a member of International Platinum Group Metal Association (IPA) and Glencore is a member of Wirtschaftsvereinigung Metalle (WV Metalle), who were both unsupportive of the CSDDD in their consultation responses. However, based on their other memberships, the companies still have overall neutral relationship scores.
- ArcelorMittal was the only company of those engaged by PRI Advance conduct its own independent lobbying on the CSDDD, and one of only two metals and mining companies that submitted consultation responses overall. Despite being unsupportive of the CSDDD,

ArcelorMittal still received a significantly higher organisational score (31) than its relationship score based on the positions of its metals and mining specific associations (13). This indicates that the trade associations ArcelorMittal is a member of are more oppositional to the CSDDD than the company itself.

Despite most assessed companies being members of trade associations that have taken supportive or neutral lobbying positions on the CSDDD, the companies themselves have remained publicly silent on their individual stances. If companies are genuinely supportive of human rights legislation, as their memberships suggest, they should be more independently vocal to amplify that support.

Companies also have leverage over the lobbying positions of their trade associations through their membership fees and should use this influence to pressure more progressive values. They should be assessing the positions of their trade associations to identify areas of misalignment with company policies and values. These assessments should be publicly disclosed, and where there is misalignment, the company should engage with their associations to address it.

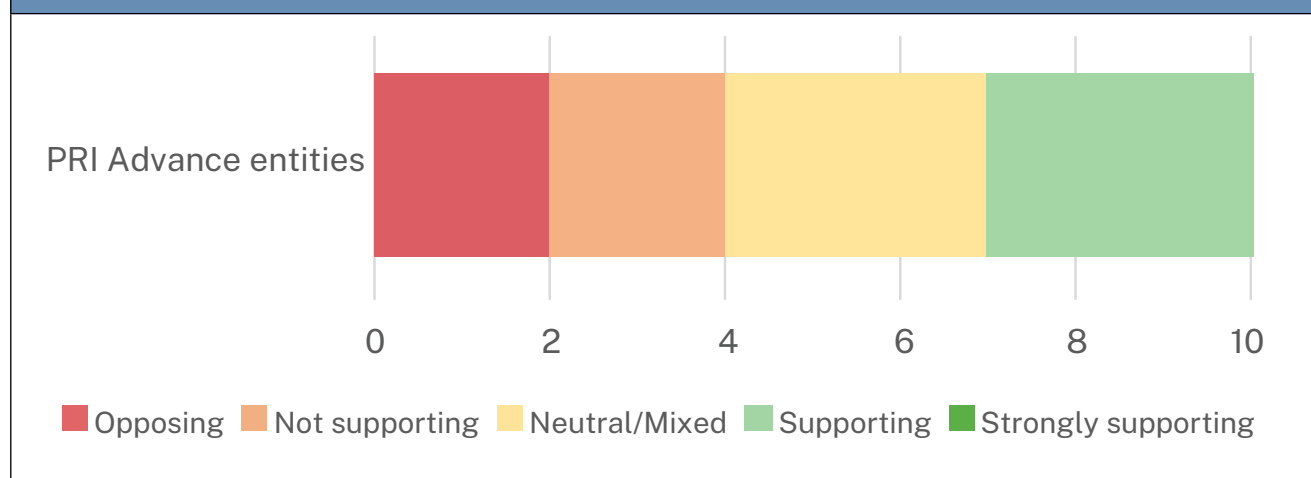
Where metals and mining companies are more supportive than their associations, they should make independent public statements and clarify whether or not they agree with the positions taken by their trade associations. An example of this was seen by companies such as Nestlé, Unilever, and L'Oréal, who insisted on including a caveat in a statement made by one of their associations in relation to the Omnibus I proposal.⁴⁴ They specified their individual company position, making sure that their support for the CSDDD was not watered down. More companies and sectors should be encouraged to do the same to improve transparency as well as present a more accurate picture of policy and lobbying positioning.

⁴⁴ See above, note 9.

General findings

Distribution of overall positions

[Figure 2: Distribution of overall positions for assessed entities]



This section looks at the 11 entities that lobbied directly on the CSDDD and have a PRI Advance association, including the 10 trade associations outlined above and ArcelorMittal. Out of these entities, two were oppositional to the CSDDD, three were non-supportive, three neutral, and three supportive. None of the entities received an overall strongly supportive score in relation to the legislation.

The entity with the highest organisational score is ICMM, with a score of 75, providing a good example of supportive lobbying in the mining sector. ICMM engaged primarily with Theme 1 (mandatory human rights due diligence) and overall lobbied in support of enforcement mechanisms (indicator Q1.3), civil liability (Q2.5), and comprehensive coverage of value chain scope (Q3.1). The entity with the lowest organisational score, and only one assessed company member ArcelorMittal, is Steelbel, with a score of 11. Steelbel lobbied most strongly against the inclusion of provisions on stakeholder engagement and directors' duties (indicator Q1.4 and Theme 4). Overall, the average organisational score of the 11 entities is 41, which is on the low end of being a neutral position.

Through the assessment of consultation responses, it became evident that some trade associations were also working in collaboration

on their submissions. This is clear from the framing and language of their responses, with some entities providing verbatim responses to open-ended questions.⁴⁵

Indicator Analysis

The indicators that were least engaged with are:

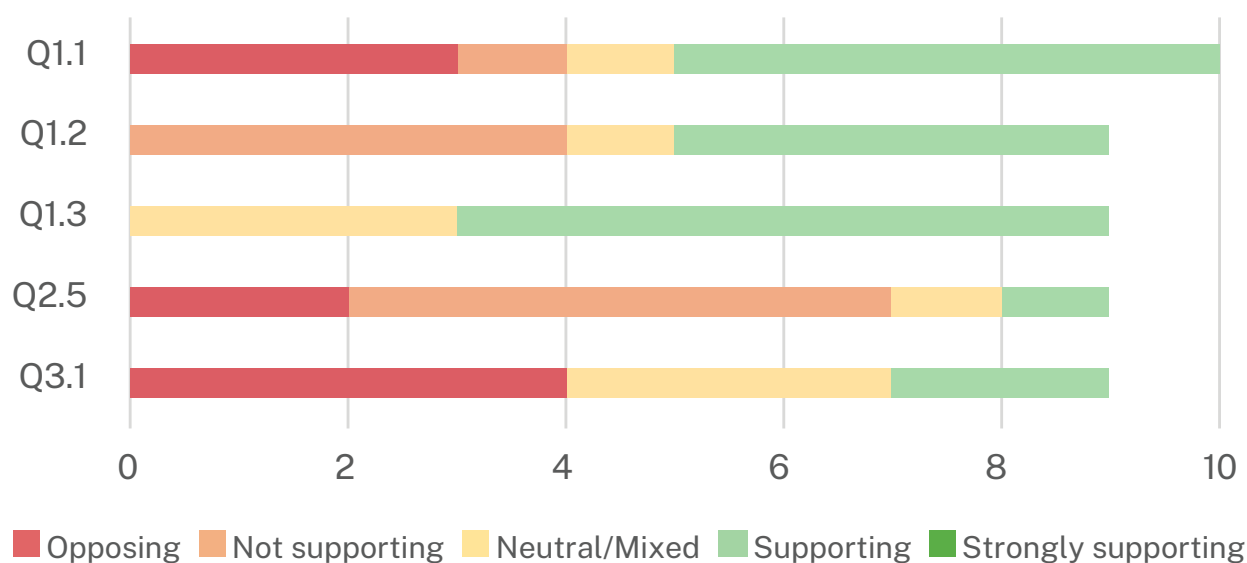
- Q2.2 (requiring companies to exert leverage to their counterparties in the remediation of human rights impacts),
- Q2.4 (require stakeholder engagement in the remediation process),
- Q2.6 (allowing victims to seek remedy in parent company's home country if unable to find remedy in their own country),
- Q3.2 (require assessment and additional action where risks for severe human rights impacts are greatest), and
- Q4.4 (require that action plans are developed in consultation with affected stakeholders)

Of the minimal engagement that was seen on allowing victims to seek remedy in parent company's home country if unable to find remedy in their own country (Q2.6) and requiring that action plans are developed in consultation with affected stakeholders (Q4.4), the scores received were either neutral (Eurometaux) or non-supportive (ArcelorMittal) respectively.

⁴⁵ Social LobbyMap provides a more in-depth analysis of the collaboration identified in the third publication of this series.

Indicators with the most engagement from assessed entities

[Figure 3: Most engaged indicators and distribution of positions for assessed entities]



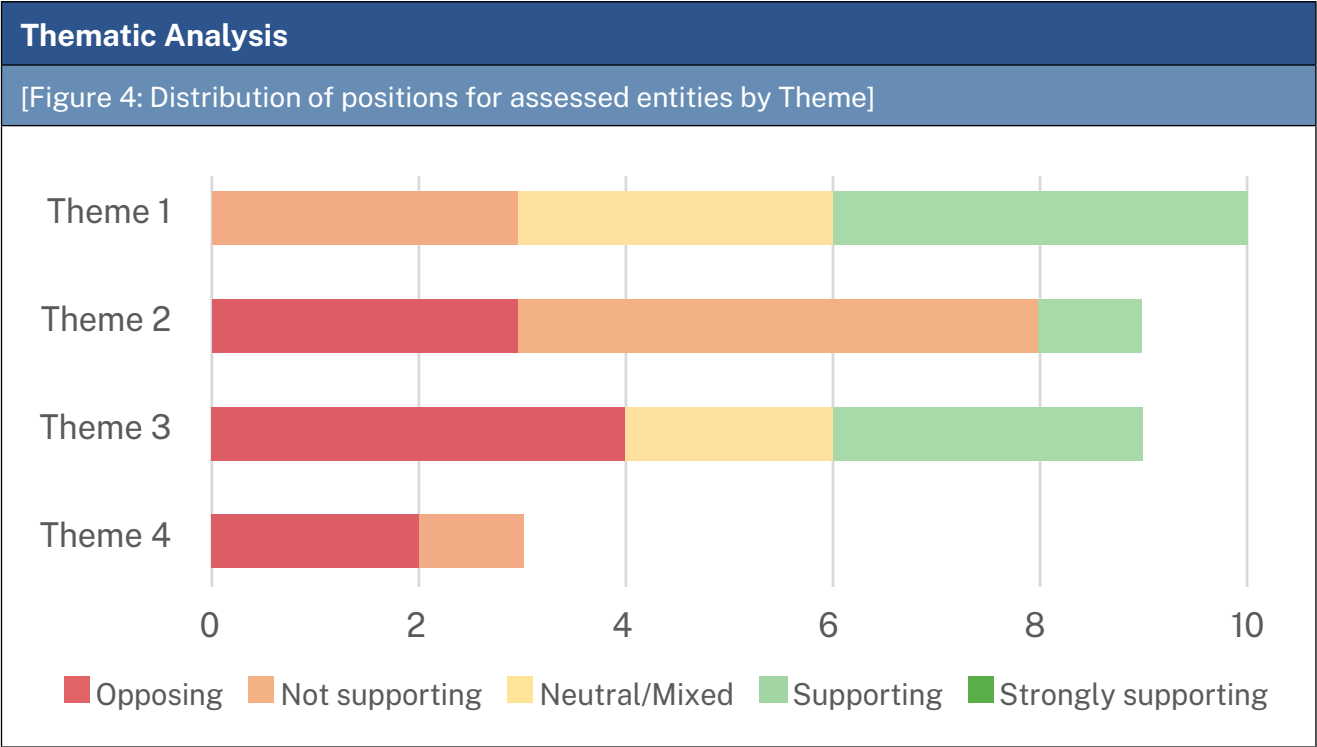
The indicators that were most engaged with are:

- 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)
- Q1.3 (implementing an enforcement mechanism),
- Q2.5 (enabling judicial enforcement with liability and compensation), and
- Q3.1 (requiring companies to implement a due diligence process covering their value chain).

Eight of the 11 entities assessed lobbied against enabling judicial enforcement with liability and compensation (Q2.5), with two entities receiving opposing scores and six receiving non-supportive scores. WV Metalle and Wirtschaftsvereinigung Stahl (WV Stahl) led the opposition and, of the six entities that received non-supportive scores all received the same score (25). Five of the eight entities with non-supportive or opposing scores are German or EU wide trade associations and only one entity, ICMM, received a supportive score (75).

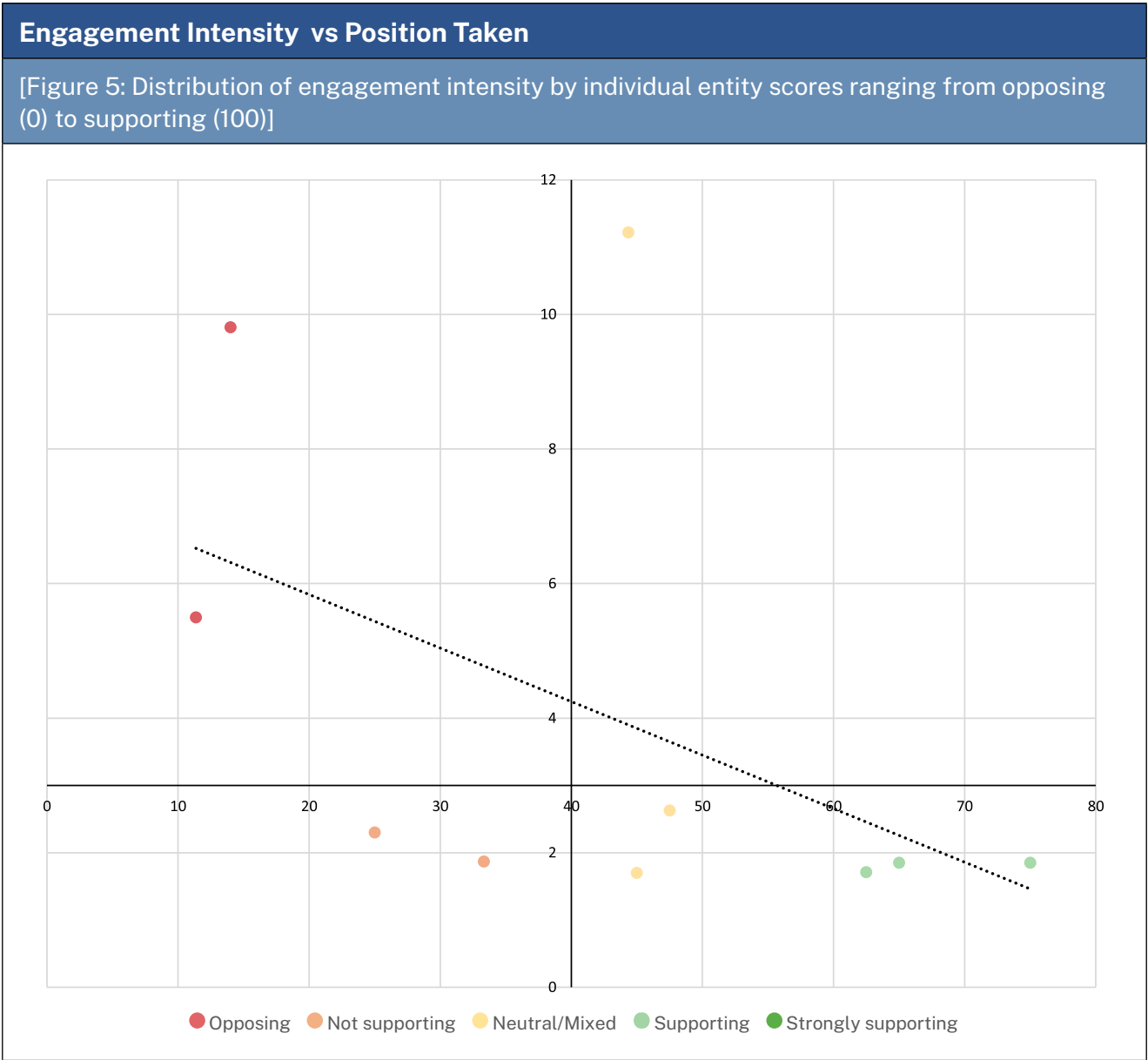
Every entity assessed lobbied on making effective human rights due diligence a legal requirement (Q1.1) and seven of those 11 hold supportive and neutral positions (five have supportive scores and two have neutral scores). Requiring companies to implement a due diligence process covering their value chain (Q3.1) received majority oppositional and neutral scores (four opposing and four neutral). Only two entities, ICCM and the Cobalt Institute, have supportive scores (75), and the overall average score for this indicator is non-supportive (34).

Thematic Analysis



Entities engaged most on human rights due diligence (Theme 1) which was quite split across the board; four entities have supportive scores, three have neutral scores and four have non-supporting scores, resulting in a neutral average score (50). Remedy (Theme 2) received majority (8/10) non-supportive and opposing scores due to higher levels of unsupportive engagement on enabling judicial enforcement with liability and compensation (Q2.5). Similarly, value chain human rights due diligence (Theme 3) received majority non-supportive and neutral scores (four opposing, one non-supportive and two neutral) due to significant lobbying on requiring companies to implement a due diligence process covering their value chain (Q3.1). Both Theme 2 and Theme 3 saw limited engagement across other indicators within their themes. Entities lobbying on provisions on stakeholder engagement (Theme 4) was limited and, of the four entities that did engage, all had non-supportive or opposing positions; Eurometaux (38), ArcelorMittal (25), WV Stahl (0), and Steelbel (0).

Lobbying Intensity



Lobbying intensity refers to the amount of individual lobbying activity an entity undertakes.⁴⁶ Overall, the PRI Advance metals and mining 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 project,⁴⁷ which identified that the loudest voices are

the least supportive, leaving supportive voices less perceptible. For instance, the five highest scoring entities had an average organisational score of 59, coupled with an average engagement intensity score of 1.9. In contrast, the five lowest scoring entities had an average organisational score of 23, with an average engagement intensity score of 4.8. In the middle is Eurometaux, which presents an interesting case and behaves in a unique

46 For more information on how engagement intensity scores are calculated, please consult the Annex.

47 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>.

way in the light of this analysis. It received an overall neutral organisational score of 44 while still being linked to the third highest number of PRI company memberships in this dataset (5) and has the highest engagement intensity score (11.2) amongst the entities. In this, Eurometaux is less supportive of the CSDDD than both ICM and ICA Europe, both of which have high PRI company memberships) but also more supportive than entities with next high engagement intensity scores.

Furthermore, seven of the entities, including the only three supportive entities, have an engagement intensity score of less than three, which the Social LobbyMap project considers to be limited data. Thus, while a few of the entities demonstrated overall supportive positions, they lobbied significantly less. In most of the cases, this is a result of the entities showing support more generally, but then not responding to all the CSDDD consultation questions or providing less detail on their positions. Where entities are supportive of an EU due diligence framework, they should also be vocal on their support for specific provisions and obligations, especially those that are being contested by other entities. A good example of this is ICM, who despite limited lobbying, expressed support for civil liability as a form of enforcement (indicator Q2.5), which typically receives negative lobbying.

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 more recently, on Omnibus. This captures additional lobbying that cannot be scored due to the inability to assess the positions taken by the entities during the meetings. However, while these activities do

not contribute to the SLM's lobbying intensity scores, it demonstrates that companies and trade associations are amplifying their voices to policy makers through other avenues.

Findings from the EU Transparency Register show that the Cobalt Institute, European Precious Metals Federation (EPMF), and WV Metalle all met individually with the European Commission on "Sustainable corporate governance", which was the title of the Commission's CSDDD consultation. Four meetings took place between September 2020 and April 2021, with phase two of the CSDDD consultation closing in February 2021. Eurometaux also met with the Commission on "EU due diligence in supply chains – Importance of the forthcoming EU legislation on the non-ferrous metals industry" in March 2021. More recently, Eurometaux held a meeting on "Omnibus on sustainability" in February 2025, and the International Copper Association Europe held a meeting on "Omnibus" in March 2025. It is important to note that it cannot be determined whether meetings simply titled "Omnibus" are in relation to the CSRD/CSDDD/Taxonomy Omnibus proposal, or the potential upcoming environmental omnibus.⁴⁸

Separately, a number of companies, including companies engaged by the PRI Advance Initiative Anglo American,⁴⁹ Glencore,⁵⁰ Teck Resources,⁵¹ and Rio Tinto,⁵² did not submit consultation responses or hold meetings but nonetheless have "Corporate Sustainability Due Diligence Directive", "CSDDD" or "Corporate due diligence" listed under their main EU legislative proposals or policies targeted on their EU Transparency Register profiles. This could indicate that other metals and mining entities are either monitoring or engaging with the CSDDD; however, the extent and positioning of their engagement cannot be publicly determined.

48 Commission invites feedback on future of environmental legislation simplification, July 2025, https://environment.ec.europa.eu/news/feedback-request-simplification-environmental-legislation-2025-07-22_en/

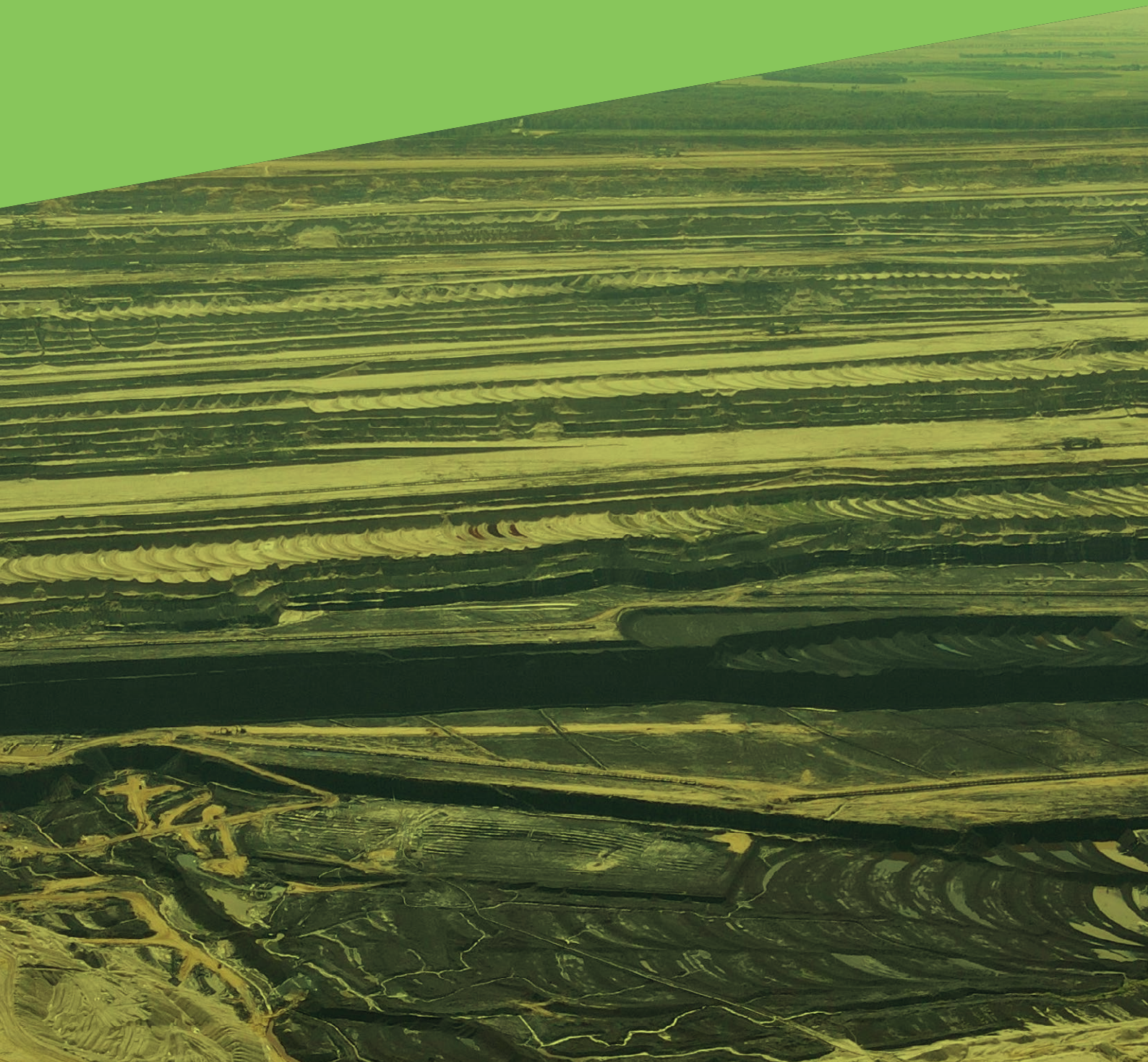
49 https://transparency-register.europa.eu/search-register-or-update/organisation-detail_en?id=932483333204-67.

50 https://transparency-register.europa.eu/search-register-or-update/organisation-detail_en?id=869729025581-78.

51 https://transparency-register.europa.eu/search-register-or-update/organisation-detail_en?id=691930794394-24.

52 https://transparency-register.europa.eu/search-register-or-update/organisation-detail_en?id=991744840418-06.

■ Case studies



■ Case studies

While the previous section finds that metals and mining companies and associations demonstrated comparatively lower levels of engagement on the CSDDD than other key sectors, metals and mining entities have been found to be active in lobbying in other legislative contexts. This section sets out three country-specific cases where the mining sector was found to be involved in lobbying on laws that Indigenous peoples' rights, labour rights, and community rights and local participation. These cases capture both direct and indirect lobbying by companies analysed for this report - whether independently, as seen by BHP in Australia and First Quantum in Zambia, or again, through their trade association memberships as seen in the cases of Brazil and Zambia. These cases serve to demonstrate the key actors involved and the positions taken by the mining sector in engaging with human rights legislation.

Brazil

Indigenous peoples' rights

In Brazil, the constitution protects Indigenous territories from exploration by mining activities.

Any mining activity carried out on Indigenous lands is illegal, if it hasn't been approved by the responsible government authority and the Indigenous communities with claims to the territory. Indigenous communities have a clear right to veto any use of their land. For decades, this legal situation has been criticized by mining and agriculture companies and has been targeted in particular by the Bolsonaro administration.

In 2020 the government led by Jair Bolsonaro introduced a program aimed at enabling mining in many Indigenous territories. The Mining and Development Program consists of 110 targets or goals for the sector, including regulation for opening up Indigenous land to mining. Entitled "Advancement of Mining into New Areas," item 3.4 of the plan establishes the goal of "Promoting regulation of mining on Indigenous land."⁵³

Investigations by journalists have since uncovered through freedom of information requests⁵⁴ that mining sector interests have had a strong impact on the 110 targets.⁵⁵ The Brazilian Association of Mineral Research Companies (ABPM) and the Brazilian Mining Institute (IBRAM) are identified as major players,⁵⁶ the

⁵³ Federal government targets for mining were dictated by the market, documents reveal, December 2020, <https://observatoriodamineraçao.com.br/metas-do-governo-federal-para-a-mineracao-foram-ditadas-pelo-mercado-revelam-documentos/>.

⁵⁴ <https://observatoriodamineraçao.com.br/wp-content/uploads/2020/12/Contribuicoes-PMD-LAI-Observatorio-da-Mineracao.pdf>.

⁵⁵ See above, note 53.

⁵⁶ Program launched by Bolsonaro wants to pass the tractor – not the cattle – in the mining sector, September 2020, <https://observatoriodamineraçao.com.br/programa-lancado-por-bolsonaro-quer-passar-o-trator-nao-a-boiada-no-setor-mineral>.

latter being a trade association representing several big mining enterprises such as PRI Advance's Alcoa, Anglo American, AngloGold Ashanti, ArcelorMittal, BHP, Lundin Mining, Rio Tinto and Vale.

The consultation held on the program included written submissions by private sector representatives as well as a closed-door meeting in August 2020. No civil society organisations or Indigenous representatives were invited to contribute. Instead, participants included the Brazilian Association of Portland Cement, the Association of Mining Municipalities of Brazil (Amig), the Brazilian Association of the Ornamental Stone Industry (Abirochas), the Brazilian Association of Mineral Research Companies (ABPM), the Brazilian Association of Mineral Coal (ABCM), the Geological Service of Brazil (CPRM) and the Special Secretariat for Productivity, Employment and Competitiveness (SEPEC) of the Ministry of Economy.

The legislative proposal Bill PL 191/2020, which was also introduced by the Bolsonaro government in 2020, aimed at following through with the 'goals' of the Mining and Development Program.⁵⁷ Officially described as 'regulating mining in Indigenous territories' in practice it removed Indigenous peoples' right to veto exploration and use of their land. Despite attempts to fast-track adoption of the bill, the legislative process was delayed and finally ended after Bolsonaro's successor Lula called on the National Congress to stop the adoption of the bill in 2023.⁵⁸

It is reported that the Bolsonaro administration held several meetings with foreign ambassadors from countries with a strong interest specifically

in mining, to discuss the PL 191/2020 bill. Among the most consulted ambassadors were those for the United States of America, Canada, Australia, and United Kingdom, as well as the European Union. Canada and the US are particularly mentioned in having shared their own experiences in mining on Indigenous lands.⁵⁹

Australia

Labour Rights

Australian labour legislation distinguishes between employees and hired workers. Hired workers are employed through an agency who supply workers for other firms. The contract is between the company and the labour hire agency, which means that the company is not paying the workers directly. Instead, they are paying the agency which in turn pays the worker.

Until recently, it was possible to pay hired workers considerably less for the same job. This pay gap has been closed by the Albanese administration with the "Same Job, Same Pay" initiative. Under the new legislation, the agencies are required to match wages, bonuses and other allowances the client company provides for their contractual employees. Thereby, labour hire is becoming more expensive and less attractive for companies.⁶⁰

The move to close the loophole in pay parity was met with considerable lobbying efforts, in particular by the mining sector.⁶¹ The campaign was supported by the Australian Chamber of Commerce and Industry, the Australian Energy producers, Business Council of Australia (members include BHP and Rio Tinto), Council of Small Business Organisations Australia

57 Association of Brazil's Indigenous Peoples Succeeds in Pressuring President Lula da Silva to Dismiss "Anti-Indigenous" Mining Bill, May 2023, <https://future.amazonwatch.org/news/2023/0518-apib-succeeds-in-pressuring-president-lula-to-dismiss-anti-indigenous-mining-bill>.

58 See above, note 57.

59 Foreign ambassadors' influence on Bolsonaro's strategy to authorize mining on indigenous lands, September 2021, <https://observatoriodaminacao.com.br/foreign-ambassadors-influence-on-bolsonaros-strategy-to-authorize-mining-on-indigenous-lands/>.

60 Australia's New "Same Job, Same Pay" Law: What It Means for Labour Hire Workers, January 2025, <https://labouroptions.com.au/same-job-same-pay-for-labour-hire-workers/>.

61 Business is trying to scare us about 'same job, same pay'. But the proposal isn't scary, June 2023, <https://theconversation.com/business-is-trying-to-scare-us-about-same-job-same-pay-but-the-proposal-isnt-scary-207113>.

(COSBOA), Master Builders Australia, Minerals Council of Australia (members include BHP, Rio Tinto and subsidiaries of Anglo American, Anglo GoldAshanti, and Glencore) , National Farmers Federation, and the Recruitment and Staffing Industry Australia (RCSA).

Mining had been the first, but not the only sector to benefit from the labour rights model. According to reports, BHP is considered to be “leading the charge” of lobbyists, arguing considerable losses in profits if it were mandated to pay hire workers the same as contracted workers.⁶²

Since the adoption of the Same Job, Same Pay legislation in 2023, corporate lobbying has continued to try to abolish it again. Alleging huge costs for the companies and unfair treatment of more experienced workers, mining companies are continuing to oppose it. In the lead up to Australian elections in May 2025 political parties were positioning themselves on this issue with the opposition leader indicating they were not planning to overturn the legislation.⁶³ However, unions and other labour right representatives expressed scepticism of this assertion.⁶⁴

Zambia

Community rights and local participation

In June 2025, the Zambian Minister of Mines and Minerals Development signed commencement orders for the Minerals Regulation Commission Act (New Mines Act)⁶⁵ and the Geological and Minerals Development Act.⁶⁶ The New Mines Act repeals the Mines and Minerals Development Act of 2015, increasing the rights available to local communities and Zambian entities, placing limitations on foreign ownership, and facilitating partnerships with artisanal miners.⁶⁷ The new legislation introduces efforts to increase local ownership and participation in mining projects through prioritisation of local goods and services, employing citizens, and investing in community development.⁶⁸

Zambia’s mining industry has long been under the control of large foreign owned corporations who hold significant influence over national policy and local markets⁶⁹ and have been associated with community⁷⁰ and local harm.⁷¹ Yet, the rapid expansion of the mines owned by

62 Putting an end to labour hire exploitation in the mining sector, November 2023, <https://www.australianunions.org.au/2023/11/21/putting-an-end-to-labour-hire-exploitation-in-the-mining-sector/>.

63 Australia’s mining industry faults new labor rights for rising costs, September 2024, <https://asia.nikkei.com/business/markets/commodities/australia-s-mining-industry-faults-new-labor-rights-for-rising-costs>.

64 Coalition says it won’t repeal Same Job Same Pay industrial relations laws, unions sceptical, April 2025, <https://www.abc.net.au/news/2025-04-05/same-job-same-pay-laws-in-doubt-under-coalition-election-2025/105138292>.

65 National Assembly of Zambia, The minerals regulation commission Act, 2024, <https://www.parliament.gov.zm/sites/default/files/documents/acts/Act%20No.%2014%20of%202024%20The%20Mineral%20Regulation%20Commission.pdf>.

66 National Assembly of Zambia, Geological and Minerals Development Act, 2025, <https://zambialii.org/akn/zm/act/2025/2/eng@2025-04-15>.

67 Zambia’s New Mining Law: Key Insights and Practical Recommendations for Investors Under the Minerals Regulation Commission Act, 2024, September 2025, <https://www.afriwise.com/blog/zambias-new-mining-law-key-insights-and-practical-recommendations-for-investors-under-the-minerals-regulation-commission-act-2024>.

68 Zambia: Mining sectors undergoes significant overhaul with implementation of new laws, June 2025, <https://bowmanslaw.com/insights/zambia-mining-sector-undergoes-significant-overhaul-with-implementation-of-new-laws/>.

69 Value addition for who? Challenges to local participation in downstream critical mineral ventures in Zambia, December 2024, <https://www.sciencedirect.com/science/article/pii/S2214790X24001503>.

70 Chinese-linked mining firms sued over ‘ecological catastrophe’ in Zambia, September 2025, <https://www.bbc.co.uk/news/articles/cy7p51l60rro>.

71 Zambian communities sue mining giants over spill disaster, September 2025, <https://www.southernafricalitigationcentre.org/zambian-communities-sue-mining-giants-over-spill-disaster/>.

these large entities has allegedly resulted in forced resettlement to unsuitable areas without compensation⁷² e.g., communities living near the Kansanshi and Sentinel copper mines in Zambia are taking legal action against First Quantum Minerals over involuntary displacement.⁷³ Thus, the new legislation's focus on local participation and community development can be seen as a response to these harms and the desire for a more equitable mining sector.

However, as the proposed New Mines Act was being developed, lobbying and resistance emerged from mining industry associations. The Association of Zambia Mineral Exploration Companies (AZMEC), whose members include Anglo American and Barrick, and the Zambia Chamber of Mines (ZCM), whose members include First Quantum and Barrick, state that the bill would create greater investment risks and policy instability.⁷⁴ The entities warned against the potential disruption to Zambia's increased copper production strategy and emphasised that the bill would put the property rights of mining investors at risk which would in turn hinder the investments required for mining exploration and the discovery of further mineral deposits.⁷⁵

They specifically opposed section 15 of the bill,⁷⁶ which initially allowed the Zambian government to acquire and maintain interest in exploration areas prior to the granting of an exploration license. The state interest was aimed at ensuring that Zambian citizens receive fair returns and benefits from their natural resources,⁷⁷ with critics such as the ZCM calling it "abnormal and impractical" and lobbying for limited amendments and regulations as to not burden companies and decrease sectoral efficiency.⁷⁸ Throughout drafting the New Mines Act, the Ministry of Mines and Minerals Development also held consultations with numerous stakeholders ranging from private sector companies, trade associations, civil society organisations, community representatives, and academics.⁷⁹ First Quantum, AZMEC, and ZCM were all consulted as part of the process.

After months of mining companies' lobbying and opposition, the Zambian government revised the bill and section 15, which still allows for the state to close off specific areas for government investment (section 14), but removes the provisions allowing government interest in exploration projects, reducing

72 Zambia: Communities Living Near Zambian Copper Mines Take Legal Action Against Mining Giant First Quantum Minerals Over Alleged Involuntary Resettlement of Thousands of People, March 2025, <https://allafrica.com/stories/202503210502.html>.

73 Communities living near Zambian copper mines take legal action against mining giant First Quantum Minerals over alleged involuntary resettlement of thousands of people, March 2025, <https://www.leighday.co.uk/news/press-releases/2025-news/communities-living-near-zambian-copper-mines-take-legal-action-against-mining-giant-first-quantum-minerals-over-alleged-involuntary-resettlement-of-thousands-of-people/>.

74 Joint Statement by AZMEC and ZCM on Minerals Regulation Commission Bill, August 2024, http://mines.org.zm/joint-statement-by-azmec-and-zcm-on-minerals-regulation-commission-bill/?doing_wp_cron=1725916514.3340809345245361328125/.

75 Zambia: Proposed mineral law will 'seriously undermine property rights' says Chamber of Mines, August 2024, <https://www.business-humanrights.org/en/latest-news/zambia-proposed-mineral-law-will-seriously-undermine-property-rights-says-chamber-of-mines>.

76 <https://www.parliament.gov.zm/sites/default/files/documents/bills/THE%20MINERALS%20REGULATION%20COMMISSION%20BILL%2C%202024.pdf>.

77 Group accuses mining companies of pursuing selfish interests, calls for more govt controls, September 2024, <https://www.zambiamonitor.com/group-accuses-mining-companies-of-pursuing-selfish-interests-calls-for-more-govt-controls/>.

78 Chamber of Mines raises the alarm over 'abnormal and impractical' mining policy proposals, September 2024, <http://mines.org.zm/chamber-of-mines-raises-the-alarm-over-abnormal-and-impractical-mining-policy-proposals/>.

79 https://www.parliament.gov.zm/sites/default/files/documents/committee_reports/REPORT%20OF%20THE%20COMMITTEE%20ON%20NATIONAL%20ECONOMY%2C%20TRADE%20AND%20LABOUR%20MATTERS%20ON%20THE%20RECONSIDERATION%20OF%20THE%20MINERALS%20REGULATION%20COMMISSION%20BILL%2C%20N.A.B%20NO.%201%20OF%202024.pdf.

protections for Zambia's shares in its minerals and resources. Despite industry lobbying resulting in a weakening of certain provisions, the new legislation is a significant advancement for Zambia's mining industry. It ensures increased public procurement and local participation, as mining license holders will be required to favour Zambian goods and services, employ Zambian citizens, and implement training programmes. The legislation also introduces tangible financial consequences for non-compliance securing local economic participation in the mining value chain.⁸⁰

80 Zambia's mining sector undergoes significant overhaul with implementation of new laws, July 2025, <https://africanminingmarket.com/zambia-mining-sector-undergoes-significant-overhaul-with-implementation-of-new-laws/22722/>.

■ Conclusion



■ Conclusion

The research shows that the mining sector is well-versed in corporate lobbying. Analysis of resources dedicated to political engagement and case studies of known attempts to influence social policies create a picture of a highly engaged sector. However, this engagement appears limited when it comes to the CSDDD, where overall activity is below the average level observed across other SLM sectors.

It is common practice for the sector to rely on trade associations for political engagement. However, this reliance is often not paired with structured, transparent analysis of how trade association positions align with the companies' stated values and operational practices. Given the sector's resources, access, and influence, companies should be more transparent about their positions on social regulation and publish position statements and consultation responses independently from their trade associations, particularly when they are supportive.

Analysis of metals and mining companies shows that most of the biggest companies from the sector have memberships in trade associations that were neutral or supportive of the CSDDD. Yet individual company lobbying remained limited. Companies with memberships to supportive entities like the International Council on Mining and Metal (ICMM) should also be aware of less supportive positions held by other entities claiming to represent "the sector". If they find that these positions do not align with the positions they hold themselves, this can lead to fragmentation of what is perceived as the voice of the metals and mining sector. It is important to ensure positive voices are heard and clearly represented. By doing so, the sector can enhance its influence on important social and environmental legislation.

■ Annexes



Full indicator description

| Theme | Code | Methodology Question |
|---|------|---|
| Human Rights due diligence | Q1.1 | Making human rights due diligence a legal requirement for companies including systems to identify, assess, mitigate, or manage human rights risks and impacts to improve that process over time and to disclose risks and impacts, the steps taken and the results. |
| | Q1.2 | Requiring human rights due diligence of all companies, regardless of sector and size, while still reflecting their individual circumstances. |
| | Q1.3 | Implanting an enforcement mechanism where companies fail to carry out due diligence as described. |
| | Q1.4 | Including in the duties of directors and company law obligations to avoid human rights impacts or “harms”. |
| Remedy | Q2.1 | Require companies to provide remedy for human rights impacts they have caused or contributed to. |
| | Q2.2 | Require companies to exert leverage and/or provide support to their counterparties in the remediation of human rights impacts that are linked to company activities through their business relationships (eg. their value chains). |
| | Q2.3 | Require companies to provide grievance mechanisms for all stakeholders including those in the value chain. |
| | Q2.4 | Require companies to actively engage, consult and involve rights-holders (or their representatives) at all stages of the remediations process. |
| | Q2.5 | Enabling judicial enforcement with liability and compensation in case of harm caused by not fulfilling the due diligence obligations |
| | Q2.6 | Enable and support effective remedy by allowing victims (or their representatives) of the actions of subsidiaries outside the parent company’s home country to sue the parent company if victims are not able to find remedy in their own country. |
| Value Chain Human Rights Due Diligence | Q3.1 | Require companies to implement a due diligence process covering their value chain to identify, prevent, mitigate and remediate human rights impacts and improve the practice over time. |
| | Q3.2 | Require assessment and additional action (eg. capacity building or monitoring of suppliers) where the risks for severe human rights impacts are greatest. |
| | Q3.3 | Require that companies implement contract clauses and Code of Conduct with business partners clarifying obligations to avoid and to address human rights harms. |

| Theme | Code | Methodology Question |
|-------------------------------|------|--|
| Stakeholder engagement | Q4.1 | Require that companies identify their stakeholders (including vulnerable individuals, groups and communities) and their interests. |
| | Q4.2 | Require directors to establish and apply mechanisms or, where they already exist for employees for example, using existing information and consultation-channels for engaging with stakeholders. |
| | Q4.3 | Require that human rights risks and impacts should be assessed through dialogue with stakeholders or with their legitimate representatives. |
| | Q4.4 | Require that action plans are developed in consultation with affected stakeholders. |
| | Q4.5 | Require that corporate directors should manage the human rights risks for the company in relation to stakeholders and their interest including on the long run. |

| Definitions of scores⁸¹ | | |
|---|---|--|
| Organization Score (0–100) | Organization Score is a measure of how supportive or obstructive the company's direct engagement is towards social policy. | A score of 0 indicates full opposition, and a score of 100 indicates full support. If no evidence has been found on a company's position on an indicator, this is signified with an "n/s" (not scored). |
| Relationship Score (0–100) | Relationship Score is a measure of how supportive or obstructive the company's trade associations are towards social policy. The Relationship Score is an aggregate assessment of the social policy engagement of a company's trade associations. This calculation accommodates an assessment of the strength of the relationship between a company and an industry association. For example, a stronger weighting will be attributed where a company has a representative on the board of an industry association. | A score of 0 indicates full opposition of all trade associations linked to the company, and a score of 100 indicates full support. Not all companies are assigned a Relationship Score, as the research did not identify links for some companies. Trade associations are not assigned a Relationship Score. |
| Engagement Intensity (0–100) | An independent measure of how active a company or trade association is in its direct social policy engagement activities. This metric is independent of the Organization Score and Relationship Score and is "policy position agnostic." It provides a useful measure of the strategic importance an organization places on social policy within its advocacy program. This metric applies equally to both companies and trade associations. | A score ranging from 0 to 100 indicates the intensity of policy engagement. A score below 3 indicates relatively limited engagement. Entities with an Engagement Intensity score of below 3 are not considered for rankings of most supportive or most opposing in this analysis. |

⁸¹ See The LobbyMap Methodology, InfluenceMap, <https://lobbymax.org/briefing/LobbyMap-Methodology-24422> for further information on the scores.

| Scoring explanation | |
|---------------------|--|
| 80-100 | Strongly Supporting – Actively advocates for stronger regulation |
| 60-79 | Supporting – General support with limited action |
| 40-59 | No/mixed position – Some support, some opposition |
| 25-39 | Not supporting – Seeks to weaken regulation |
| 0-24 | Opposing – Actively lobbies against stronger protections |

■ Disclaimer



■ 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 whose lobbying activity is being assessed in this report were 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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