

# Joint civic statement on the European Horizon 2020 project MIREU

## Abstract

*This joint civic statement signed by signatories from Bosnia, Finland, Ireland, Portugal, Slovakia, and Spain is an appeal for the European Commission to review the public funded research project MIREU on European mining and metallurgy regions, part of the Horizon 2020 framework programme. The statement and the collected evidence suggest that the project is implemented in non-compliance with its Grant Agreement objectives and the respective call issued by the European Commission. It especially wants to express the signatories' concern about the deficient involvement of civil society in the project and its capacity to deliver credible and robust data back to the Commission and its publications on raw materials policy.*

## I. PRESENTATION

THE signatories of this statement are civil society organisations and movements, as well as local community groups advocating for self-determination and decision power of local communities faced with mining and metallurgy projects that conflict with sustainable land-uses and will affect their livelihoods, mid and long term territorial development, as well as their general socio-cultural environment and its ecosystems.

## II. PURPOSE AND PREAMBLE

This joint civic statement signed by civil society organizations, and community groups from the member states (MS) is a complaint to the European Commission (EC) and its bodies *EASME* and *Directorate-General GROW*, considering the implementation of a research project under the 8th Framework Programme for Research and Innovation (FP8), "Horizon 2020". In this statement we want to express our concern with the project *MIREU - Mining and Metallurgy Regions of EU*, with grand ID 776811 (€3m) in response to call SC5-15-2016-2017/e [1], as we note a discrepancy between call and project implementation, as well as a structural

bias of research design and a disequilibrium of involved project partners and researchers. This procedural and structural weaknesses will most probably affect the credibility and robustness of the data reported back to the EC and its policy publications, e.g. the *EIP Raw Materials Scoreboard 2020*, and also influence the mid and long term development of rural territories.

Preliminary remark: As communities possibly or currently affected by mining and metallurgy projects we acknowledge the societal need for a sufficient supply of raw materials and associated goods and technologies. At the same time we cannot admit extractive policies that are primarily demand-driven without factoring in the costs of long-lasting impacts on territories and livelihoods. We recognize the EC's endeavours for more intra-community self-sufficiency in raw materials to attenuate geopolitical risks and endorse its efforts to investigate lower impact alternatives for extraction and transformation. We are, however, concerned about proposals that are branded *green*, *circular*, or *sustainable* while still being grounded in perpetual growth and a manifold future need for energy, goods, and non-energy raw materials. These are some of the reasons that

make us advocate for the self-determination and decision power of local communities faced with mining and metallurgy projects, based on the principle of free, prior, and informed consent.

In the following we will present the observed circumstances that led to this statement.

### III. OBJECTIVES VERSUS IMPLEMENTATION

EC FP8 call SC5-15-2016-2017 for an “EU network of mining and metallurgy regions” consists of ten criteria that should be addressed by the action. The call’s specifications are reflected by the objectives of the project responding to the call [2]. Among them, the definition of a European approach to Social License to Operate (SLO) with the development of a respective *Toolbox* and *Guidelines*. While the EC call highlights the “mobilisation of civil society organisations and local communities” and SLO objectives claim “an open dialogue and transparent process that includes all actors potentially or currently affected by mining and metallurgy operations”, WP4 of MIREU, in charge of the data collection and elaboration of the deliverables, so far failed the required mobilisation. The project partners discussing the SLO definition and involved in the elaboration of the Guidelines consist mainly of governmental bodies (e.g. geological surveys and regional authorities), consultants to the industry and its representational entities, as well as national academia, mostly with focus on engineering, mining, and on Earth Sciences.

Due to this configuration, the European SLO definition originally proposed within WP4 and already disseminated to the public in a video on SLO, highlighting the importance of the *decision-making power of local communities* [3], was strategically weakened by the intervention of single participants. First, through the request of the Geological Survey of Finland (GTK), explicitly concerned with government and industry interests [4]. And later in the process by a request of a representative of Roxgold Inc., sustaining her request in

personal viewpoints of a “brouhaha around exploration drilling for shale gas” and a premature reasoning of “people just didn’t understand it” when particular conflicts could not be resolved through company interventions [5].

#### i. Public consultation

The situational framing of the last contribution is particularly relevant. From May 7th to June 5th 2020, “MIREU stakeholders and partners” were invited to give their feedback to the provisional “European SLO Guidelines Draft” (Deliverable 4.3) of the project [6]. From June 10th 2020 on, five days after the closure of the internal draft review period, actors internal and external to MIREU issued their opinions and change requests. Quite a lot of contributions to the SLO Guidelines Draft were distributed under the subject “public consultation”, some being partners of MIREU and members of its undisclosed *Advisory Board* (e.g. Euromines). Later on, also WP4 lead Pamela Lesser confirmed the status of the exchange as public consultation [7]. Besides the weakening of the reference to local communities’ control power in the document, also the annihilation of any statements that point to a refinement of current legislation and monitoring to regain public acceptance was frequently requested.

The signatories of this statement want to stress that no proper public consultation of the SLO Guidelines was performed in the process and that the results of the internal review process, as described above and predominantly informed by positions of mining and metallurgy industry actors and their consultants, do not represent the communities’ positions. Also, the consideration of community perspectives in the SLO Guidelines draft does no longer correspond to the public communication of the project (e.g. video on “European SLO”).

## ii. Research in absentia

Taking into account civil society's and local communities' positions is an integral part of the EC call's requirements. However, this approach is absent in the data collection of the 'mining and metallurgy conflict case studies' to be integrated into the SLO Toolbox delivery. Not only does the data collection lack a consistent research design and implementation, but also the studies so far elaborated within and presented to WP4 were exclusively prepared by geologists, engineers, and other personnel without proper academic qualification to perform community fieldwork. In particular, most of them were elaborated in absence of the populations in question, at least in Finland, Poland, Portugal, Slovakia, Spain, and the UK. In many cases, this configuration led to a loss of trust among local civil society organisations, as the sample testimonies in *Annex I* confirm. Understanding mining and metallurgy disputes and their complex dynamics within the inter-cultural context of the projects regions would have required first-hand and eventually longer-term qualitative research, taking into account the perspectives of communities and NGOs.

It is evident that the employed approach stands in contrast to the "objective of the SLO work in MIREU [...] to improve transparency and communication, with the ultimate aim of building trust." In the case of Portugal, also analysed conflicts were arbitrarily selected. An analysis of the ongoing and precedent mining conflict, the lithium development project of *Mina do Barroso*, is missing in the generated data set. The data was collected solely through a press and social media review [8–10].<sup>1</sup> In general, a robust and standardised socio-historic framing of each case study and the cultural context of the analysed mining conflicts is lacking. Also, per date of this

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<sup>1</sup>Inaccuracies of the reports include the assumption of an ongoing EIA process for the Romano mine of Lusorecursos which is, per date of this statement, not the case. In general, the report lacks a proper revision of wording, personal distance (e.g. "beautiful minerals"), and referencing of sources.

statement, case studies focussed solely on mining while a lookout on metallurgy is not provided, even for examined regions with long-term metallurgy conflicts, like Bosnia.

In Finland, reference cases for the SLO Toolbox development have not been discussed in depth to expose eventual weaknesses of existing frameworks. The signatories want to express their doubts on the *Finnish Network for Sustainable Mining's* capabilities to establish a "common platform on which all stakeholders were meant to come together" and the effectiveness of the proposed self-regulation [11, p. 46]. For example, the Network lacks solid protocols that would oblige corporations to rectify documented misconduct. This procedure enables Dragon Mining Ltd to enjoy uncontested Network membership despite a track-record of environmental non-compliance in both *Orivesi* and *Kaapelinkulma* mines.<sup>2</sup> Thereby, the projects are rejected by the host communities, most of which lack knowledge of the Network.

Also, MIREU WP4 *Dispute/Conflict Mapping Finland* resorts to generalising terminology of designating any disputing societal actors as 'anti-mining movements' or assuming their affiliation with an 'anti-mining scene'. The gathered data is mainly based on a press review and undocumented personal experience and not backed up by fieldwork data [15].

Besides this, the case study author has a track record in taking the approach to the object of study without personal distance, as for example in attributing civic activism to family genetics [16]. Prior work defines grassroots initiatives and NGOs in Finland as "yuppie-activists" with "nationalistic-populistic [sic!] rhetoric" and diagnoses "a pseudo-patriotic discourse as demagogic appeal for emotions" [17]. Frequently, criticism and resistance are not further investigated but attributed to a

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<sup>2</sup>In 2018, the regional environmental authority *ELY-Centre* found an illegal waste dump in the Orivesi mine which resulted in a police investigation still in progress. [12, 13] Despite the dumping being a long-term operation, Dragon Mining's reports, also to the Network, between 2014 and 2018 do not mention this information. [14]

general “lack of public awareness of geology and mining” or a “NIMBY attitude”, while openly admitting that “many geologists have a negative attitude towards environmental activists” [17].

The above contribution has a certain relevance as it does not only constitute a particular case, but reveals a systematic bias: The NIMBY<sup>3</sup> ‘concept’, ‘theory’, ‘attitude’, ‘phenomenon’, or ‘syndrome’ is frequently referred to, both within the project publications and in earlier work by MIREU’s contributors [18–25]. As e.g. Borell & Westermark have shown in their 2018 literature review, the signatories want to stress that the term never constituted a theory and that they do not consider it a feasible denomination for contemporary social scientific contributions [26]. First and foremost due to the the acronym being used as a “catchall term to label the opposition”, implying that “citizens have illegitimate or irrational selfish (or narrow) reasons” for opposing projects [27]. Thus, it serves merely as an indicator for the lack of data and a need for more qualitative research, compromising mutual trust between communities and researchers when scholarly publications and reports to the EC still resort to the terminology. Instead of broadening and deepening the understanding of oppositional positions in the MS, and also as a result of research conducted in absentia, civic positions are misrepresented and questions of corporate responsibility omitted. E.g., the MIREU report on Finland does not incorporate data on civic initiatives, such as complaints to public authorities [28].

In sum, the terminological vagueness and the procedures exemplified for the case studies on Finland and Portugal suggest serious quality issues concerning the gathered data, both considering the overall scientific quality, but also, and especially in the former case, eligibility of the assigned authorship.

As a result of the inappropriate execution of the call objectives on a holistic mobilisation, the signatories fear that not only the Guidelines

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<sup>3</sup>Acronym for ‘not in my backyard’.

but also the resulting Toolbox data may lack sufficient depth of analysis and granularity considering the complexity and overall quality of conflicts around existing or future mining and metallurgy projects.

### iii. Multidisciplinary approach

Further EC call requirements to the project include involving in particular experts in relevant social sciences and humanities to guarantee a multidisciplinary approach and a robust understanding of mining and metallurgy SLO in the cultural contexts of the MS regions. Contrary to the call expectations, there is only one social sciences or humanities faculty among the 28 partners of the MIREU project, the Arctic Centre of the University of Lapland, outnumbered by technical faculties and mining schools.

To our knowledge, the Arctic Centre did not contribute any case studies to the SLO Toolbox. The only conflict case study to date steered by a social scientist and contributed to SLO WP4 of MIREU by another H2020 project does not align well with the focus of MIREU as it is restricted to small-scale mining without considering existing conflicts around large-scale mining and metallurgy in Bosnia.

The signatories do not consider these limited contributions a *particular involvement of social sciences and humanities* as per EC call definition. Besides that, authors involved in the editorial work of the Guidelines may be prone to conflict of interest, either through secondary employment and research being sponsored by the industry, or by directly participating in raw materials consultancy and trade.<sup>4</sup>

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<sup>4</sup>Gregory Poelzer holds a research position with *Hjalmar Lundbohm Research Centre* at Luleå University of Technology, fully sponsored by the Swedish mining company *LKAB*; Michael Tost runs the sustainability consultancy *Mango Impact e.U.*; Günter Tiess, CEO of *MINPOL GmbH*, is the director of the minerals business *Mineralienvielfalt GmbH*, selling gemstones and ‘healing’ crystals.

#### iv. Involvement of civil society

The EC FP8 call of the project also specifies the involvement of civil society. The only tool of MIREU with the potential of substantial public participation, the web-based *MIREU Survey on the Perception of Mining in Europe*, running during two months in October and November 2019, presents considerable design, deployment, and evaluation flaws. Among them, the lack of proper translations of the survey into the languages of the involved MS which were only added for the last three weeks of the survey.<sup>5</sup>

Also, the employed sampling method of referral sampling, initiated through MIREU's consortium network, and thus prone to community bias, cannot be considered representational. Standard mitigation measures like diverse initial informants were not employed. Quite the contrary, internal statements note the non-representative nature of the survey, with considerable sub-sets generated in mining school classes and in *Raw Materials Week* context.<sup>6</sup> Moreover, the generated data set of 278 responses can be considered insufficient for any robust quantitative evaluation.

Another approach to involve civil society in the project was the proposal of "street journalism" at Fridays for Futures (FFF) events, put into practice by the German MIREU partner *Geokompetenzzentrum Freiberg* (GKZ) and also supported by the project partner GTK from Finland. The concept was based on interviews conducted by previously instructed GKZ family members and friends in order "see if they [FFF participants] understand the links between climate change and mining." [29,30] The approach suffers from considerable confirmation bias, as informants are considered merely means to the end of verifying a pre-existing supposition. Moreover, the

<sup>5</sup>For the most part, the survey was accessible in English only and with technical terminology that further reduced accessibility.

<sup>6</sup>As a discussion on September 16th 2019 confirms, WP4 was not only aware of MS language restrictions, but also of both ethical and sampling issues. The ethics committee at University of Exeter rejected the survey.

unidirectional and undisclosed approach of civil society involvement suffers not only from a lack of transparency, but may very well be considered illicit within the FP8 ethics rules and codes of conduct, especially when considering an assumable involvement of minors.

#### v. Implementation resumé

Considering the above observations, the signatories consider the involvement of civil society in the project, apart from inter-H2020 clustering sessions and stakeholder workshops solely attended by expert public, insufficient, inappropriate, and partially illicit.

### IV. EVALUATION AND POSITION

We acknowledge that the EC call, apart from its objective of strengthening EU's mining regions, highlights an important observation: namely, that there is an attempt to improve social acceptance of mining and metallurgy in Europe. However, we consider these improvements impossible without profound reforms, both on legislative and operative levels, which also guarantee transparency and the right to self-determination of communities. Although research projects and, as required by this particular call, the focus on social sciences can be important tools for initiating this reformulation, the already existing fragility of society-academic relations should not be jeopardised through research approaches that may result in deficient data and a reduced social acceptance of research.

For example, the signatory movements reject both the terms *stakeholder* and *SLO* as pejorative denominations born within a context of socio-political risk management of industrial enterprises [31]. Considering the former, we prefer *the concerned public* as a neutral designation per Aarhus Convention and also *host communities* or *affected communities*, on a local level, as both maintain the diverging nature of extractive-industrial proposals of usually limited duration and any group

of residents with intergenerational long-term interests in the same territory. We therefore appeal to the EC to secure a neutral and case-related research on regional development that shall not pursue for-profit goals in a biased manner. Neither should it adopt its nomenclature and procedures (e.g. *NIMBYism*, *SLO*, *stakeholder screenings* or *community profiling*) without proper reflection and mitigation measures of transparent public consultation and involvement. We furthermore defend the right to comprehensively informed self-determination and decision power of local communities, confronted with the implementation of mining and metallurgy projects. This is especially important in the case of rural regions of the peripheral member states, as their potential shall not be reduced to demographics and the monetary value of renewable and non-renewable natural resources.

Considering the above observations the signatories of this statement ask the European Commission and its responsible bodies, EASME and DG GROW, to audit the implementation of MIREU, since they have serious doubts that the project will meet its promises to deliver a new, working SLO model for European regions. If they come to the conclusion that the project, in its entirety or partially, does not meet the requirements of the call proposal or does not live up to its self-proclaimed standards of a positive social impact of research, the signatories would also ask the EC to query the establishment of a subsequent and permanent *Council of Mining and Metallurgy Regions of Europe* (CoMMER), in the currently proposed configuration.

Europe, August 24, 2020

#### THE SIGNATORIES

**Associação Guardiões da Serra da Estrela**  
*Fundão* PORTUGAL

**Associação Montalegre Com Vida**  
*Montalegre* PORTUGAL

**Associação Unidos em Defesa de Covas do Barroso**  
*Boticas* PORTUGAL

**Brečtan**  
*Nové Mesto nad Váhom* SLOVAKIA

**Chceme zdravú krajinu**  
*Hlohovec, Piešťany & Trnava* SLOVAKIA

**Corema - Associação de Defesa do Património**  
*Caminha* PORTUGAL

**Ecologistas en Acción**  
*Madrid* SPAIN

**Eko Forum Zenica**  
*Zenica* BOSNIA AND HERZEGOVINA

**Em Defesa da Serra da Peneda e do Soajo**  
*Arcos de Valdevez, Melgaço & Monção* PORTUGAL

**Fundação Montescola**  
*Lousame* SPAIN

**Greencastle People's Office**  
*County Tyrone* IRELAND

**Kitkan Viisaat ry**  
*Kuusamo & Posio* FINLAND

**Movimento ContraMineração Beira Serra**  
*Guarda & Coimbra* PORTUGAL

**Movimento ContraMineração Penalva do Castelo, Mangualde e Sátão**  
*Viseu* PORTUGAL

**Movimento de Defesa do Ambiente e Património do Alto-Minho**  
*Caminha* PORTUGAL

**Movimento Não às Minas – Montalegre**  
*Montalegre* PORTUGAL

**Movimento SOS Serra d'Arga**  
*Viana do Castelo* PORTUGAL

**Movimento SOS Terras do Cávado**  
*Braga* PORTUGAL

**Osikonmäen Kyläyhdistys ry/Pro**

**Osikonmäki**

*Rantasalmi* FINLAND

**Pelastetaan Kaapelinkulma Movement**

*Valkeakoski* FINLAND

**Petição Pela Preservação da Serra da**

**Argemela**

*Covilhã* PORTUGAL

**PNB - Povo e Natureza do Barroso**

*Montalegre* PORTUGAL

**Podpoľanie nad zlato**

*Detva* SLOVAKIA

**Pro-Heinävesi Movement**

*Heinävesi* FINLAND

**Pro-Ylläs**

*Kolari* FINLAND

**Sociedade Histórica e Cultural Coluna**

**Sanfins**

*Lousame* SPAIN

**Saimaa ilman kaivoksia**

*Juva* FINLAND

**Save Our Sperrins**

*County Tyrone* IRELAND

**SOS - Serra da Cabreira**

*Vieira do Minho* PORTUGAL

**Urán Košice STOP**

*Košice* SLOVAKIA

**Vuohču Sámiid Searvi rs.**

*Sodankylä* FINLAND

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## V. ANNEX I, TESTIMONIES

### i. Montalegre Com Vida, 25.5.2020

*A Associação Montalegre Com Vida, contesta o relatório elaborado pelo projeto MIREU, uma vez que o mesmo nunca teve em conta a opinião e a posição dos habitantes, bem como das associações, movimentos, juntas de freguesia e juntas de compartos locais.*

*Este relatório não traduz a realidade local, deve ser feito um relatório junto da população, ouvindo as suas preocupações, anseios e reivindicações.*

*A nossa associação deve ser ouvida, pois a mesma, foi criada pelos habitantes da freguesia de Morgade, freguesia que irá ser afetada caso a mina do Romano se concretize. Praticamente toda a população da freguesia é associada desta associação, e jamais aceitara que seja construída uma mina ao lado das suas casas, destruindo os seus terrenos, a sua floresta e ver contaminada a sua água. A nossa região é Património Agrícola Mundial, reserva da biosfera, tem uma das maiores reservas de água potável da Península Ibérica. No raio de 5 km existem 125 explorações agrícolas, a zona da mina é contornada pelo rio Beça, as nascentes das Águas de Carvalhelhos ficam a menos de 500m da zona de concessão, as nossas aldeias ficam a menos de 100m da zona de concessão.*

*Consideramos que um relatório como o elaborado pelo projeto MIREU, não deve ser elaborado por Geólogos, mas por Sociólogos, Antropólogos bem como outros especialistas.*

*Já mais iremos abdicar da nossa identidade, da nossa riqueza, da nossa qualidade de vida, em detrimento de uma mina.*

*Denunciamos assim a forma pouco clara com que foi feito o relatório de projeto MIREU, pois se a população local não foi ouvida, o mesmo não corresponde a realidade.*

*Com os melhores cumprimentos,*

*Armando Pinto, Associação Montalegre Com Vida*

**Translation:** The Montalegre Com Vida Association disputes the report prepared by the MIREU project, since it never took into account the opinion and position of the inhabitants, as well as associations, movements, parish councils and local councils.

This report does not reflect the local reality, a report must be made in cooperation with the population, listening to their concerns, desires and demands.

Our association must be heard, as it was created by the inhabitants of the parish of Morgade, a parish that will be affected if the Romano mine is realized. Practically the entire population of the parish is associated with this association, and

never accepted that a mine be built next to their houses, destroying their land, their forest and having their water contaminated. Our region is a World Agricultural Heritage, a biosphere reserve, it has one of the largest drinking water reserves in the Iberian Peninsula. Within a 5 km radius there are 125 farms, the mine area is bypassed by the Beça river, the springs of Águas de Carvalhelhos are less than 500m from the concession area, our villages are less than 100m from the concession area.

We believe that a report such as that prepared by the MIREU project, should not be prepared by Geologists, but by Sociologists, Anthropologists as well as other specialists.

We will no longer give up our identity, our wealth, our quality of life, to the detriment of a mine. We thus denounce the unclear way in which the MIREU project report was made, because if the local population was not heard, it does not correspond to reality.

Best regards,

Armando Pinto,

Associação Montalegre Com Vida

### ii. Não às Minas Montalegre, 6.6.2020

*O Movimento Não às Minas – Montalegre lamenta ver o seu nome escrito no MIREU, não tendo para isso sido contactado pelos promotores do documento. Uma vez que não fomos contactados, tomamos a liberdade de emitir a nossa opinião sobre a Licença Social para Operar (LSO). O ambiente no terreno é, foi e será hostil. Por várias vezes, a GNR – Guarda Nacional Republicana foi chamada a intervir, devido a escaramuças entre a empresa Dakota Minerals(Novo Lítio) e a Lusorecursos, assim como entre funcionários da Lusorecursos e as populações locais.*

*As populações não confiam na empresa concessionária e têm sérias reservas relativamente à forma como o processo foi sendo desenvolvido desde o seu início. A prova disso são os vários litígios existentes em tribunal: empresas contra empresas; sócios contra sócios, associação representativa das populações afectadas contra o estado e a empresa, etc. Todos esses casos estão devidamente documentados nos tribunais e já deram origem a vários programas televisivos de investigação e artigos em jornais, todos no mesmo sentido: um processo pouco transparente que deixa várias dúvidas de legalidade, além da falta de respeito pela vontade das pessoas que nunca foram ouvidas e pela protecção da natureza e de um recurso natural valiosíssimo: a água.*

*Nós sabemos que as medidas de mitigação dos impactos servem apenas para a aprovação dos projectos.*

*Na prática não são implementadas e a fiscalização é ineficiente. Também sabemos que as promessas de centenas de empregos são uma falácia. Há muito tempo que os trabalhos nas explorações mineiras deixaram de ser essencialmente manuais. Com o aumento da mecanização, a relação percentual entre o número de trabalhadores e o número de toneladas extraídas tem reduzido drasticamente. Além disso, os desenvolvimentos tecnológicos criaram a necessidade de mão-de-obra qualificada, excluindo dessa forma muitos potenciais candidatos da região. Por outro lado poderão estar em causa centenas de postos de trabalho dos residentes, que vivem, essencialmente, da agricultura e pecuária. As populações estão cientes das consequências da exploração mineira, responsável pela contaminação de águas, solos e ar e dizem não a esses projectos. Não é esse desenvolvimento que pretendem para esta região, classificada como Património Agrícola Mundial, pela FAO, e Reserva da Biosfera, pela UNESCO. Se o projecto avançar nunca será aceite pelas populações e poderá ter sérias dificuldades em laborar.*

**Translation:** The Movimento Não às Minas - Montalegre regrets seeing its name written in MIREU, as it was not contacted by the promoters of the document. Since we were not contacted, we take the liberty to express our opinion on the Social License to Operate (SLO). The environment on the ground is, was, and will be hostile. GNR - Guarda Nacional Republicana [military police] was called on to intervene several times, due to skirmishes between the company Dakota Minerals (Novo Lítio) and Lusorecursos, as well as between Lusorecursos employees and the local populations.

People do not trust the concessionaire company and have serious reservations about how the process has been developed since its inception. Proof of this are the various lawsuits in court: companies against companies; partners against partners, representative association of the populations affected against the state and the company, etc. All of these cases are duly documented in the courts and have already given rise to several investigative television programs and newspaper articles, all in the same direction: a non-transparent process that leaves several doubts about legality, in addition to the lack of respect for the will of the people who were never heard, and also in terms of the protection of nature and a very valuable natural resource: water.

We know that impact mitigation measures are only for project approval. In practice, they are not implemented and inspection is inefficient. We also know that the promises of hundreds of jobs are a

fallacy. Since quite a time mining work does no longer rely on an extensive manual workforce. With the increase in mechanization, the percentage ratio between the number of workers and the number of tons extracted was drastically reduced. In addition, technological developments have created the need for skilled labour, thereby excluding many potential candidates from the region. On the other hand, hundreds of jobs may be at stake for residents, who essentially make their livings with agriculture and livestock. People are aware of the consequences of mining, which is responsible for the contamination of water, soil and air and say no to these projects. It is not this development that they intend for this region, classified as World Agricultural Heritage, by the FAO, and Biosphere Reserve, by the UNESCO. If the project moves forward, it will never be accepted by the population and may have serious difficulties in working.

### iii. Guardiões da Serra da Estrela, 5.6.2020

*A Associação Guardiões da Serra da Estrela, que se debate contra o pedido de exploração mineira a céu aberto para a Serra da Argemela desde 2017, e contra os pedidos de prospecção mineira da empresa Fortescue Metals Group para a região da Beira Baixa submetidos à DGEG no ano passado, não foi contactada para emitir qualquer parecer no âmbito do projecto MIREU. Notamos a total ausência de uma consulta pública às populações e regiões directamente implicadas nos processos, e neste projecto em específico, notamos uma clara análise tendenciosa que visa unicamente a aprovação e a implantação de projectos mineiros à revelia das populações e em total desrespeito com a preservação do património local, seja ele histórico, arqueológico e geológico, assim como também desconsiderando a riqueza dos ecossistemas existentes, que urgem serem protegidos a longo prazo.*

*Assim sendo, a Associação Guardiões da Serra da Estrela exige que seja feita uma avaliação rigorosa, imparcial e transversal de todas as áreas afectadas por este projecto de fomento mineiro.*

**Translation:** The Guardiões da Serra da Estrela Association, which has been fighting against the request for open pit mining for the Serra da Argemela since 2017, and against the requests for mining prospecting by the company Fortescue Metals Group for the Beira Baixa region submitted to DGEG in the last year, was not contacted to issue an opinion within the MIREU project. We note a total absence of a public consultation with the

populations and regions directly involved in the processes, and in this specific project, we note a clear biased analysis that aims solely at the approval and implementation of mining projects in absence of the populations and in total disrespect for preservation of local heritage, be it historical, archaeological or geological, as well as disregarding the wealth of existing ecosystems, which urgently need to be protected in the long term.

Therefore, the Associação Guardiões da Serra da Estrela requires that a rigorous, impartial and transversal assessment of all areas affected by this mining development project be carried out.

#### iv. SOS Serra d'Arga, 28.5.2020

*De facto, nós no Movimento SOS Serra d'Arga nunca sentimos confiança no projecto MIREU, conforme sabes. Podes informar a [...] disto.*

*Adicionalmente, concordamos com ela também em relação ao tipo de investigação para levar adiante uma análise isenta deste impacto.*

*Infelizmente, em Portugal a Academia está demasiado vinculada (leia-se dependente) aos interesses económicos de quem a financia... Por isso é que houve estudos da UP em prol da mineração, por exemplo - porque garantiram donativos a departamentos, financiamento de bolsas, etc. Assim, parece-nos pouco provável que haja disponibilidade académica para esse estudo sério e urgente. No entanto, existem outros profissionais, mais independentes, que poderão dar o seu contributo. [...]*

*Patrícia,  
Movimento SOS Serra d'Arga*

**Translation:** In fact, we in the SOS Serra d'Arga Movement never felt confident in the MIREU project, as you know. You can report this to [...].

Additionally, we also agree with her regarding the type of investigation to carry out an analysis exempt from this impact.

Unfortunately, in Portugal the Academy is too linked (read dependent) to the economic interests of those who finance it ... That is why there were UP [University of Porto] studies in favour of mining, for example - because they are granted donations to departments, scholarship funding, etc. Thus, it seems unlikely that there will be academic availability for this serious and urgent study. [...]

*Patrícia,  
Movimento SOS Serra d'Arga*

#### v. Unidos em Defesa de Covas do Barroso, 3.8.2020

*Associação Unidos em Defesa de Covas do Barroso* is a local association which aims to protect our heritage, the environment and quality of life in Covas do Barroso, Boticas, and ultimately the rivers and ecosystems of a whole region in Northern Portugal. It was created in December 2018 due to widespread concerns about a large scale mining project in the region, brought forward by Savannah Resources in ongoing disregard for the local population. We are therefore astonished that the case of Covas do Barroso has in no way been looked at by the MIREU project, allegedly for a lack of time on the part of FCT/UNL. We consider it to be highly representative of the lack of citizens involvement in current European mining projects.

This disregard goes in line with the absolute absence of information and dialogue we have experienced over the last years not only on the part of the Portuguese government but also the company itself. One of the most blatant examples for this solely top-down process was the fact that the Secretary of State visited Covas do Barroso in November 2019 explicitly to meet with the company, showing complete disregard for the views and the presence of the local population. The corporate social responsibility of the company to involve the community in the process was supposedly fulfilled through monthly newsletters that did in no way allow us to understand the general overview of the project or to enter in a horizontal dialogue. Moreover, investor reports have only one single time been translated into Portuguese.

Most recently, the size of the environmental impact study, of which we by now know to be 6000 pages long, can hardly be conducive to an exhaustive analysis and in fact be counterproductive in terms of dialogue on the environmental impact of the mining project on a local, regional and even national level. A government that considers territorial coherence and demographic stability as one of its key priorities should see the democratic participation of its people central to its administration and should expect and demand the same from any of its agents acting under them, such as mining companies. The same should be said for the European Union: if the aim of the public funding of the MIREU project is to gain a deep understanding of the society's concerns regarding mining projects in Europe's regions,

studies should be grounded on a real involvement of local populations like that of Covas do Barroso.

This has not been done and we thus refuse to be represented by MIREU's results, produced without public consultation at national or local levels.