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75inQ Public Comment:

EU Critical Raw Materials Centre

Introduction

75inQ welcomes the Commission's initiative in putting forward the EU Critical Raw Materials Centre (henceforth EUCRMC). As an organisation seeking to advance the energy transition, 75inQ supports this initiative which will facilitate a lower cost of production for renewable energy hardware. This mechanism will increase the stability of critical raw material (henceforth CRM) supply in the EU and surely facilitate a prompt energy transition. 75inQ's concerns lie in the human rights abuses entailed by the extraction of CRMs in third countries and most specifically those affecting women. By lowering the costs of CRMs and thus increasing their demand in Europe, the text risks increasing the human rights abuses committed in the name of EU CRM demand. There is therefore an urgent need to address the issue in the text at hand.

Comments

Supply chain methodologies and risky partnerships.

75inQ believes the methodologies regarding supply chain sustainability assessment should be reinforced in the context of the EUCRMC. That is, especially given the fact that the amendment to consider human rights records in Strategic Project applications did not make it into the final text of the CRMA.¹ Without clearly and stringently addressing human rights abuse concerns in the methodologies used for supply chain assessments in the EUCRMC, the text risks increasing negative distributional impact the EU's energy transition has on the standards of living in third countries.

¹ Chamon, Merijn, and Thomas Verellen. "Empowering the Green Deal: Significant Delegation and Constitutional Limits in CBAM and CRMA." In Edward Elgar Publishing eBooks, 51–72, 2026.
<https://doi.org/10.4337/9781035355402.00009>.

Critical raw materials generally come from regions of the world with high human rights abuses risks in their respective mining sectors. Time and time again, research proves that these human rights abuses are not only systemic but also have further consequences on women.² By lowering the prices of critical raw materials through demand pooling and thus increasing demand, the EUCRMC risks increasing human rights abuses in these third countries. Subsequently, it also risks distributionally raising more severe and impactful female exploitation locally. In such a setting, it is more than crucial to strengthen supply chain assessment methodologies in order to avoid further harm being committed in the name of EU demand.

Illustration

75inQ operates in the sector of the energy transition, for which multiple CRMs are crucial. For illustration, REE+ and Gallium specifically are necessary imports in order to achieve a prompt energy transition in Europe.³ They are highly demanded for the manufacturing of wind power generation hardware, electric vehicles and general batteries. When looking at the countries we import these materials from, several are problematic in terms of human rights.

Largest partners of imports of REE+ by product code in 2024 in weight

Product code	Largest partners			Share in total imports		Imports / exports
	First	Second	Third	of REE+		
28461000	Russia	50% Malaysia	33% China	14%	57%	1.6
28469040	China	99% United Kingdom	1% United States	1%	31%	16.5
28469070	China	88% South Korea	6% United States	5%	3%	18.2
28053010	China	97% Viet Nam	3% United States	0%	2%	10.5
28469060	Japan	58% China	26% Norway	13%	2%	6.6
28469050	Malaysia	50% Japan	21% China	20%	2%	1.1
28469090	Viet Nam	48% China	25% United States	11%	2%	1.0
28053021	China	99% United States	1% Türkiye	0%	1%	21.1
28053039	China	100% United States	0% United Kingdom	0%	1%	494.9
28053029	China	98% Thailand	2% United Kingdom	0%	0%	28.8
28053080	United States	96% China	2% United Kingdom	1%	0%	2.1
28469030	Israel	40% China	35% United States	14%	0%	0.7
28053031	China	66% United States	18% United Kingdom	16%	0%	25.7
28053040	China	46% Japan	27% United States	25%	0%	20.0
Total	China	46% Russia	28% Malaysia	20%	100%	2.3

Note 1: 0% means less than 0.5%

Note 2: REE+ is a grouping of rare earth elements, scandium and yttrium

Note 3: Detailed list of products under each code is provided in Table 8

Source: Comext DS-045409

eurostat

² Sara L. Seck and Penelope Simons, "Resource Extraction and the Human Rights of Women and Girls," *Canadian Journal of Women and the Law/Revue Femmes Et Droit* 31, no. 1 (April 3, 2019): i–vii, <https://doi.org/10.3138/cjwl.31.1.01a>.

³ IEA, "Mineral Requirements for Clean Energy Transitions – the Role of Critical Minerals in Clean Energy Transitions – Analysis - IEA", <https://www.iea.org/reports/the-role-of-critical-minerals-in-clean-energy-transitions/mineral-requirements-for-clean-energy-transitions>.

Largest partners of imports of gallium by product code in 2024 in weight

Product code	Largest partners			Imports / exports
	First	Second	Third	
81129289	China	73% Canada	13% Russia	11% 3.6

Note: Detailed list of products under each code is provided in Table 8

Source: Comext DS-045409

eurostat 

In particular, China is the largest source of mining for several of the rare earths contained under the REE+ umbrella. Human rights violations and institutionalised forced labour in China are well known and well documented. The most striking case of it is the Xinjiang region. The Xinjiang region remains a major mining and refining region while also being the home to sizable and state-supported forced labour exploitation schemes.⁴ In this context, women especially are affected by forced labour.⁵ By making use of its regulatory power and setting proper standards for the supply chain of imported CRMs, the EU's CRMC can improve the living conditions of those living in the Xinjiang region.⁶ That is, by making their exploitation unprofitable. On the other hand, without setting more stringent standards, the EU will increase the demand for the product of their forced labour and therefore incentivise further exploitation of these persons.

Data gathered in the process

In the objective of reducing the EU's impact on the forced labour of women abroad, we must consider the positive impacts the EUCRMC regulation could have on the sector. In order for any meaningful change to occur in potentially labour-abusive supply chains to occur, the issue needs to be precisely known. The OECD itself deplores the lack of comparable data in certain CRM-intensive regions when it comes to supply chain sustainability.⁷ More importantly however, an indicator that is absent from all

⁴ OHCHR, "UN Experts Alarmed by Reports of Forced Labour of Uyghur, Tibetan and Other Minorities Across China," n.d., <https://www.ohchr.org/en/press-releases/2026/01/un-experts-alarmed-reports-forced-labour-uyghur-tibetan-and-other-minorities>.

⁵ Kim Thelwell, "Uyghur Women Speak up About Abuses in Xinjiang," The Borgen Project, September 22, 2020, <https://borgenproject.org/uyghur-women-speak-up-about-the-abuses-in-xinjiang/>.

⁶ Elisabeth Christen et al., "The Brussels Effect 2.0: How the EU Sets Global Standards With Its Trade Policy," 2022, <https://www.econstor.eu/handle/10419/278200>.

⁷ "Special Focus: Critical Raw Materials Supply Chains: Economic Security in a Changing World," OECD, September 11, 2025, https://www.oecd.org/en/publications/economic-security-in-a-changing-world_4eac89c7-en/full-report/special-focus-critical-raw-materials-supply-chains_daf99c07.html#section-d1e2814-f390f183e3.



reporting obligations in EU CRM sourcing schemes, is that of gender. The absence of gender-disaggregated data invisibilises the disproportionate consequences unsustainable mining working conditions have on women as a social group. The EU had an opportunity to mitigate the necessary but detrimental distributional impacts of the EUCRMC through its assessment schemes. That is, by closing the data gap on gender in this context, through an obligation to provide gender-disaggregated data regarding employment conditions and labour force composition.

Failure to do so does not only mean missing an opportunity for progressive action but also means producing contradiction between different EU law fields. If data is not collected regarding the exploitation of women, it is all the more complicated to put in place programmes that target its alleviation. EU action such as the Gender Action Plan targets women abroad and the collection of gender disaggregated data in a sector as exposed to forced labour as mining would allow for the elaboration of policies that are more efficient because better aimed at the populations that need it most.

Illustration

To illustrate this lack of data collection, cobalt is another CRM that is crucial to our energy transition. In majority, the EU imports cobalt from China. However, Chinese cobalt itself is, in part, mined in the DRC. Roughly 70–80% of global cobalt production comes from the DRC, and about 80% of that output is controlled or owned by Chinese companies, refined in China, and then sold to battery makers including those supplying the European market.⁸ The labour conditions in the DRC for cobalt mining are widely documented as risky, but they are also especially detrimental women's health.⁹ However, gender-disaggregated data is absent from most cobalt due diligence reports submitted under the EU Batteries Regulation (2024), despite Article 56 requiring social impact assessments. This misses women's exposure to cobalt dust and related

⁸ GlobalData. "DRC And Indonesia Anchor Global Cobalt Supply Growth Through 2026." *Mining Technology*, January 13, 2026. <https://www.mining-technology.com/analyst-comment/drc-indonesia-anchor-global-cobalt-supply/>.

⁹ Abulu, Latoya. "Cobalt Mining for Green Energy Risks Women's Reproductive Health in DRC." *Conservation News*, December 30, 2025. <https://news.mongabay.com/2024/11/cobalt-mining-for-green-energy-risks-womens-reproductive-health-in-drc/>.



reproductive harms documented in field studies near Kolwezi mines.¹⁰ The EU Critical Raw Materials Act (2024) mandates for CRM traceability but exempts artisanal sources (15–30% of DRC cobalt), where women predominate. The Corporate Sustainability Due Diligence Directive (CSDDD) demands adverse impact reporting, yet only 7% of filings disaggregate by gender, per NYU Stern BHR review.¹¹ In other words, the data gap is immense.

Suggestions

In the light of these facts, 75inQ recommends that the text at hand

1. Establishes strengthened forced labour and human rights abuses assessment thresholds for EUCRMC purchases
2. Makes conditional such purchases to a high level of labour safety and human rights protection
3. Makes mandatory the collection and reporting of gender disaggregated data in such assessments.

About 75InQ:

The 75inQ foundation works to accelerate the transition to sustainable energy by promoting gender equality in line with the Sustainable Development Goals developed by the United Nations. The Dutch foundation conducts research, awareness campaigns, community outreach and facilitation to pursue these objectives. 75inQ focuses on SDG7 and SDG5 by accelerating diversity in the energy sector towards a more inclusive and sustainable energy transition. 75inQ has an active community of 1400 female professionals in the energy sector.

¹⁰ Baumann-Pauly, Dorothée, and Geneva Center for Business and Human Rights. *Cobalt Mining in the Democratic Republic of the Congo: Addressing Root Causes of Human Rights Abuses*. White paper, New York University Stern Center for Business and Human Rights, January 2024.
https://bhr.stern.nyu.edu/wp-content/uploads/2024/01/Cobalt-Mining-2023_White-Paper.pdf.

¹¹ Ibid.