



# BOTTOM LINE!

## REPORT OVER 2023

with an outlook on 2024

ALTO, Tompotika © Stephanie Broekarts/IUCN NL



# BOTTOM LINE!

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# INTRODUCTION

The demand for minerals such as nickel, copper, bauxite (aluminium), cobalt, and manganese is rising explosively due to the energy transition. These minerals are needed for the batteries of electric cars and for wind turbines, for example. There is no doubt that we need to accelerate the transition from fossil to renewable energy. But how do we ensure that we make this shift as fairly as possible, while minimising the negative impact on people and nature?

We urgently need a **system change** that encourages us to be more prudent with our resources and to extract them responsibly, in a way that is truly future proof. Bottom Line! promotes a fair, responsible energy transition for people and nature.

Bottom Line! kicked off in April 2023 with a new and powerful coalition comprising IUCN NL, the Deep Sea Conservation Coalition (DSCC), Natuur & Milieu, Stop Ecocide NL, Alliance for Tompotika Conservation (AITo) Indonesia, A Rocha Ghana (ARG), Alyansa Tigil Mina (ATM) Philippines and the Vereniging van Beleggers voor Duurzame Ontwikkeling (VBDO).

We set out with the first challenging task of defining and aligning our joint messaging. With each of the partners departing from different focus areas and each having their own target audiences, this was quite an extensive process, but the exercise laid a strong foundation under our future work.

As a consortium we complement each other very well. Whilst each partner works on its own Bottom Line! mission, we also simultaneously deploy activities together in a variety of partnership combinations. Examples of joint action include:

- the joint petition that is currently circulating, and that calls on the Dutch House of Representatives to set limits on mining for a just energy transition;
- the joint letter from DSCC, IUCN NL and N&M to the Dutch government urging them to support the moratorium on deep sea mining ahead of the July 2023 ISA meeting;
- joint advocacy by ATM and ARG at the Global EITI conference in Dakar for sector transparency to include non-financial disclosures;
- the joint video “Tompotika: Forests, Nickel, and Critical Choices” by AITo (Indonesia) and IUCN NL;
- a presentation by IUCN NL and Natuur & Milieu at the ARTIS Planetary Health Festival; and
- joint preparations for an event focusing on the financial sector by VBDO, Stop Ecocide NL and IUCN NL.



Still from video promoting the Bottom Line! petition  
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In this report we share some of the key impacts made to date, and present a selection of activities and results from 2023. We also present an outlook on what is coming up in 2024.

# HIGHLIGHTS 2023

Bottom Line! works on the deep sea, in three forest landscapes threatened by mining in Africa and Asia, and in the Dutch and international policy arena (EU, UN) to:

1. Strengthen the voice of local communities and organizations that stand up for nature and human rights in mining-threatened landscapes
2. Advocate the need to reduce, reuse, recycle and use responsible sourced minerals
3. Increase awareness and dialogue about the footprint of the energy transition and wise energy use

Our ultimate goal is a successful energy transition with minimal damage to nature and people; a transition for which minerals are sourced responsibly and where governments, companies and financial institutions set and implement stringent rules for responsible sourcing and circularity.

In 2023 we managed to take impactful steps towards that goal in all of our landscapes! As a consortium we are proud of what we have already achieved during these first nine months of the programme.



## First results from the first 9 months (2023)

- 1 Plans to explore the Muni-Pomadze Ramsar site in Ghana for lithium mining were suspended thanks to the efforts of **ARG** (see [page 5](#)).
- 2 The Marbel Buluan watershed in the Philippines was successfully protected thanks to **ATM's** lobby, together with other NGOs and Indigenous Peoples and Local Communities (IP&LCs) (see [page 7](#)).
- 3 **DSCC** enabled a strengthened voice of Indigenous Peoples at international fora, including the annual Assembly meeting of the International Seabed Authority (ISA) (see [page 8](#)).
- 4 **DSCC** prevented the adoption of a Mining Code by the International Seabed Authority (ISA), which would have allowed deep-sea mining to begin.
- 5 The video 'Tompotika: Forests, Nickel, and Critical Choices' was published by **AITo** and **IUCN NL** (see [page 6](#)).
- 6 **AITo** conducted work with regency-level government officials, which greatly increased their awareness on the issues and threats from nickel mining towards local communities and biodiversity in Tompotika, Indonesia.
- 7 A Dutch Bill was submitted by the Partij van de Dieren to criminalise ecocide, in close collaboration with **Stop Ecocide NL** and with input from IUCN NL and DSCC (see [page 13](#)).
- 8 An investor statement was issued by 31 investors on responsible nickel supply chains, released thanks to the efforts of **VBDO** (see [page 15](#)).
- 9 Jointly, we worked hard to raise awareness about the negative impact of mining for transition minerals, from community to government level (see text box [page 17](#) and annex [page 19](#)).



# THEORY OF CHANGE

## BOTTOM LINE!



### GOAL

A successful energy transition minimizes damage to nature and people

### OUTCOME

Green energy minerals are sourced and used responsibly



### OUTCOME

Governments, companies and financial institutions set and implement stringent rules for responsible sourcing and circularity

### PATHWAY 1

In specific mineral-rich land- and seascapes, essential ecosystems, threatened species and the rights of local communities are protected

**A**

Governments set and implement strict policies for responsible mineral extraction, including no-go zones

**B**

Governments and companies are transparent about mining permits and locations

**C**

Mining companies comply with environmental and human rights protection laws

### PATHWAY 2

Circularity strategies, reduced consumption and enhanced use of recycled metals lead to reduction in use of virgin minerals

**D**

Energy sectors only use responsibly sourced and recycled minerals and metals and implement strategies for circular economy activities

**E**

Governments set and enforce rules and incentives for responsible sourcing and circular economy activities

**F**

Financial institutions only invest in best-practice and ecocide-free mining and circular economy alternatives

### STRATEGY 1



Strengthen the voice of local communities and organizations that stand up for nature and human rights in mineral-rich areas and encourage responsible mining at regional mines

### STRATEGY 2



Advocate the need to reduce, recycle and use responsibly sourced minerals among consumers and in the public and private sectors

### STRATEGY 3



Increase awareness and dialogue on the energy transition/mining footprint and wise energy use

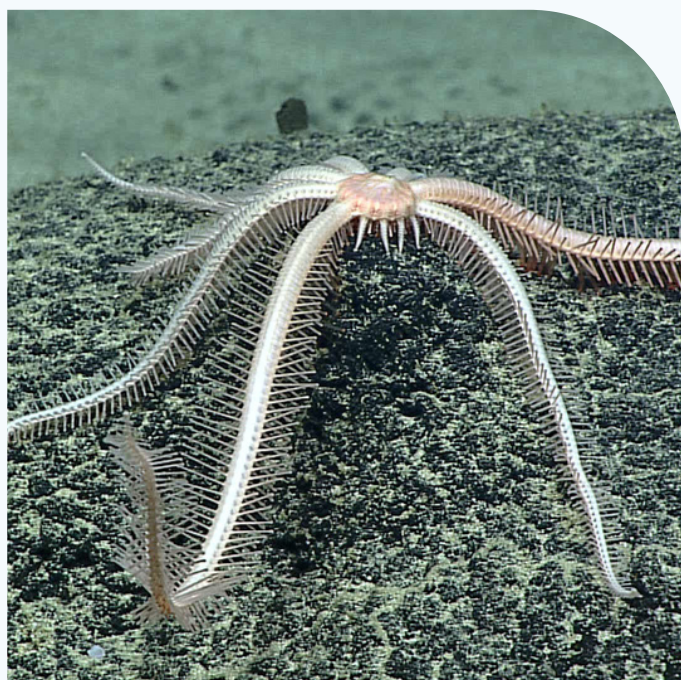
# PATHWAYS TO A SUCCESSFUL AND FAIR ENERGY TRANSITION

April 1 2023, marked the formal start of the Bottom Line! project. In the first months of the project, the consortium partners invested in planning, engaging staff, relationship and coalition building and networking with other (national and international) NGOs working on the topic to enhance and leverage our impact. We engaged with academia (e.g. TU Delft), with media (e.g., [Vrij Nederland](#), [Change Inc.](#), [Nature.com](#)) and with local and national governments on the topic. We also encountered some challenges:

## Challenges met by the consortium in year 1

- 1** A first challenge: At the very start of the project, we agreed that we had to take care when communicating about the project, as our message on the negative impacts of mining transition minerals could be perceived as an argument against the energy transition as a whole. We set out to state upfront that the energy transition is essential and should take place as soon as possible, but within the planetary boundaries.
- 2** A second challenge: Lobby and advocacy on complex issues such as those that Bottom Line! is working on, require patience and perseverance, especially in a changing political spectrum. We are therefore very pleased about the relatively small, but very significant steps that we have already been able to make in 2023, as well as the fact that transition minerals and their impact are gaining so much interest in the media as well as in the policy arena (for example the topic of deforestation caused by nickel mining in Indonesia).
- 3** A third challenge: The pro-mining propaganda and PR machine run by prospective miners is a key challenge that we continue to face in our work, not only for land-based mining but more so on the deep sea.

The ultimate goal of Bottom Line! is **a successful energy transition that causes minimal damage to nature and people**, for which transition minerals are sourced responsibly and where governments, companies and financial institutions set and implement stringent rules for responsible sourcing and circularity. To achieve this goal, we have been working on six objectives divided over two pathways, one focusing on mineral rich land- and seascapes and the other one focusing on the Dutch and European business and policy arena.



Starfish on rock surface with manganese nodules © NOAA/OAR/OER, 2016 Deepwater Exploration of the Marianas, Leg 3.

## PATHWAY 1



**In specific mineral rich land- and seascapes, essential ecosystems, threatened species and the rights of local communities are protected.**

**From April 2023 to December 2023 we worked on the following objectives to protect nature and people in mineral rich landscapes:**

**Objective A: Governments set and implement strict policies for responsible mineral extraction, including no-go zones.**



### **GHANA: Mobilising support against mining in forest reserves**

Since April 2023, rapid developments around lithium mining urged ARG to broaden its scope from bauxite mining in Atewa forest to addressing the exploration of lithium mining in high-biodiversity areas as well. ARG's monitoring of exploration and prospecting licensing on the Minerals Commission online database, led to the identification and disclosure of plans by the government to forge ahead with plans to explore for lithium ore mining in the Muni-Pomadze Ramsar Site, a wetland of international importance. With this information, ARG engaged traditional leaders and opinion leaders in the area, which led to a massive demonstration by the people of the Winneba area, that have strong objections to any plans to mine lithium in the Ramsar site. This action proved effective: the Minerals Commission has subsequently suspended plans to target the Ramsar Site, with some alterations in the Concessions made to exclude all areas falling within the Ramsar site.



Atewa forest, © Jan Willem den Besten IUCN NL

Furthermore, ARG mobilised CSOs, private companies and other partners to undertake public and policy engagements on a new legislative instrument, the LI246, that had been passed by the government of Ghana allowing mining in forest reserves and other globally significant biodiversity areas. This resulted in ARG's preparation for a court case on LI2462, that is to take place in 2024, with the aim of having the law revoked. ARG has continued to effectively mobilize local communities and the media to engage citizens on the Atewa case, while also highlighting its ecological and social significance to national development.





## INDONESIA: Protecting the Tompotika forest and its species

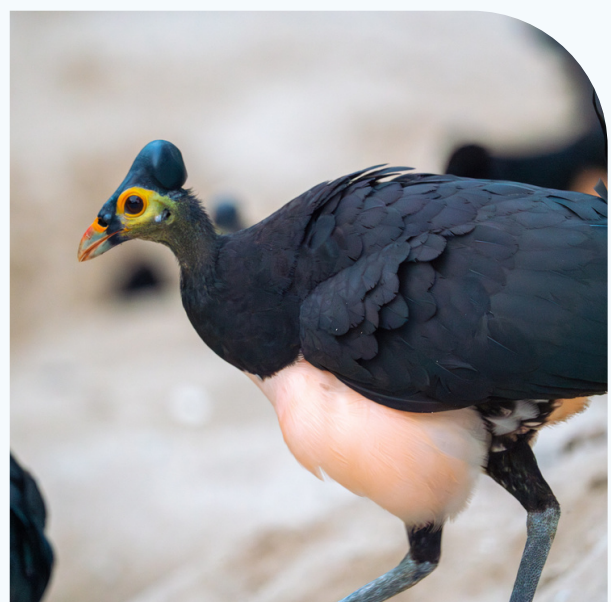
AITo has intensified its work to protect the Tompotika forest in Sulawesi and the threatened and endangered species that are or would be impacted by the opening up of at least eight new nickel mines. AITo worked with local communities to help them understand the risks of mining and what they can do to protect themselves and engaged in decision making. AITo organised a series of eight meetings with Tompotika villages expected to or already hosting mines, explained the risks of mining to humans and biodiversity, and set out a course of action. Members of local communities commonly feel that they do not have any choice in whether or not mining will enter their area. They believe that if the government issues a permit, then the matter is a fait accompli. These meetings opened their eyes.

AITo also organized a well-attended meeting of Regency-level government officials to introduce them to the issues and threats of mining towards local communities and biodiversity. Previously, there had been very little awareness among government officials or local communities of the potential risks and downsides of mining. In a meeting held in November 2023 with Regency government officials about forest and Maleo (an iconic bird that is endemic to this region) conservation, AITo introduced the group (about 30 officials) to the mining threat and showed them the video “Tompotika: Forests, Nickel, and Critical Choices in Bahasa Indonesia”.

One government official sitting next to an AITo team member swore under her breath throughout the video, and afterwards said this: “The central government has strongly promoted mining as a great investment that will only bring riches to our Regency. They issue the permits, and we [the Regency government] are just supposed to receive it. I had no idea that mining could have these kinds of effects.” Her comments are not atypical of what we hear from many who learn about this issue.

Many stakeholders state their support, in principle, for Maleo protection and other threatened species, but do not yet understand the need for large areas of undisturbed habitat for wildlife. General understanding of ecological or biodiversity issues is very low. There is more work to be done here in 2024 and 2025.

Also in the Tompotika forest, AITo and the Sampaka Village completed and submitted an application to establish a new 8.000-ha Hutan Desa (Village Forest) community-protected area in an area where mining companies have proposed new mines. This initiative stemmed from the beginning of Bottom Line! and managed to attract leverage and funding from other donors.



Maleo birds, Tompotika © Stephanie Broekarts/IUCN NL



## PHILIPPINES: successful protection of Marbel Buluan watershed

In 2023 we saw the aggressive entry of nickel mining corporations and fast-tracking of nickel mining projects, largely fueled by the rising demands from China, US and Europe. The increased demand is because of the shift in Indonesian policy to restrict the export of raw nickel, resulting in a new push for opening up new nickel mines in the Philippines where there's no such export ban yet.

However, 2023 also marked a major victory for the protection of the Marbel Buluan Watershed (MBW). After intensive campaigning of ATM together with its partner Convergence of Initiatives for Environmental Justice, other NGOs and the indigenous and local communities in the area, the governors of three provinces signed a Memorandum of Agreement for their commitment to protect and conserve the Marbel Buluan Watershed. In effect, the joint ordinance (local law) creating the MBW, puts more than 8,000 hectares of mountain into formal protected area status and a “no-go zone” for destructive projects such as open pit mining.

The watershed is right at the center of the projected Tampakan copper- and gold mine project, that would clear around 3,935 ha of old-growth, high-biodiverse forests and arable lands. For years, Indigenous and local communities have been resisting the mines because of the impacts the mine would have on the mountains, the environment, health, water and food security and hence, their livelihoods.

On a regional level, ATM co-organised the 2nd Global Thematic Social Forum on Mining and the Extractive Economy that was held in Semarang, Indonesia, with transition minerals as a focus theme. The event brought together a diverse range of participants from all over the world, including Indigenous Peoples and Local Communities (IP&LCs), unions, faith-based groups and civil society organisations that are resisting mining and extractivism with the aim to consolidate a broad movement in saying No to Destructive Mining.



Jaybee Garganera, ATM National Coordinator speaking at the Global Thematic Social Forum on Mining and the Extractive Economy.



Marbel Buluan watershed © ATM





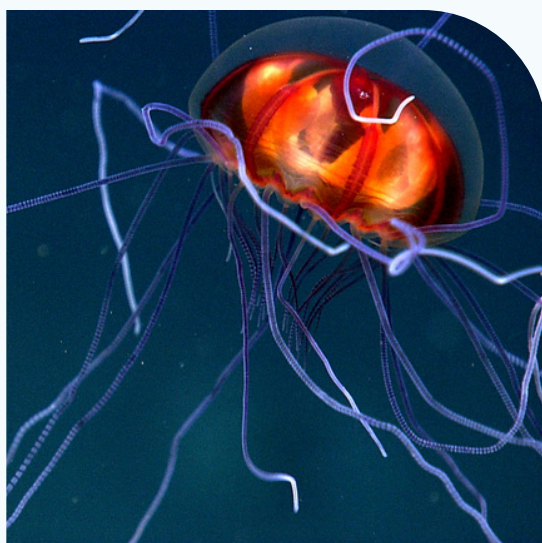
## DEEP SEA: Towards a global moratorium on deep-sea mining

The DSCC's focus in 2023 was geared towards the goal of achieving a global moratorium on deep-sea mining (DSM), with a focus on government decision makers in Europe and globally. In 2023, the number of governments calling for a moratorium or precautionary pause on DSM grew from 12 to 24. Seven of the new champions were European countries, of whom four are EU Member States – Finland, Ireland, Portugal and Sweden. In early 2024, *Denmark became the 25th country to SAY NO to deep sea mining.*

The DSCC's campaign was successful in 2023, working more closely with Indigenous leaders and communities, including providing platforms to voice their resistance to DSM on the world stage and in key policy settings. Indigenous leaders from across the Pacific have spoken out in various fora, sometimes as members of DSCC or member organization delegations. For some, this included attending the annual Assembly meeting of the ISA for the first time to make multiple passionate interventions from the Observers stand.

The UN High Commissioner for Human Rights, Volker Türk, issued a [statement](#) which highlighted the key human rights considerations of DSM and stressed the connection with the climate and biodiversity crises, calling for a moratorium.

Youth have also played an increasingly central role in DSCC's campaign over the past year. The DSCC has invested heavily in training, capacity building and providing political space for colleagues from the Sustainable Ocean Alliance (a DSCC member organization) to join at the forefront of DSM moratorium advocacy efforts. The result has been electrifying, both regarding the political impact that the next generation is already having on the processes under way, as well as to see these young new advocates in action.



A hydromedusa, seen at just over 3900 m and just above the seafloor along the west wall of Mona Canyon. © NOAA OKEANOS EXPLORER Program, Oceano Profundo 2015; Exploring Puerto Rico's Seamounts, Trenches, and Troughs

The DSCC's work with Indigenous voices throughout 2023 was one of the most fulfilling and satisfying aspects of the campaign. The cultural perspective they bring to the threat of irreversible damage to a part of the planet that few consider and fewer have ever seen, shines a completely new light on why we need to stop DSM from ever happening. Currently the only reference in the ISA negotiations to culture is in discussions around "underwater cultural heritage", which refers to any object that can be found under the sea, from a sunken vessel to submerged archaeology. This is completely different from its meaning for Indigenous and coastal peoples. In 2023, by bringing Indigenous voices to the relevant tables from which they had long been excluded, we have started to shift the conversation to where it needs to be.



→ **Challenge:** Despite concerted work to exclude DSM from European plans to supply critical minerals, the European Parliament approved a Critical Raw Materials Act proposal in favor of DSM. At a national level Norway is among those leading on the accelerated push to mine, both in its own waters and in international waters through ISA negotiations. Late in 2023, 119 parliamentarians from 16 European countries and 19 parliaments joined forces to voice their strong opposition to the Norwegian government's plans for DSM in the Arctic. In an open letter to Members of the Norwegian Parliament, these European parliamentarians called on their Norwegian counterparts to reject the government's proposal to open the Arctic to the destructive activity. The vote nonetheless went through, opening an area the size of Benelux to exploration with a clearly implied intent for exploitation.

The Netherlands has announced that it was not joining the call for a moratorium on DSM, although they did recognize that scientific knowledge regarding the effects of DSM activity is currently insufficient to make the steps from exploration to exploitation. Nonetheless, the Netherlands also announced that it was aiming to acquire an exploration license. That said, the Netherlands government did play a highly positive role in supporting the right to peaceful protest in an incident between Greenpeace and the vessel of a prospective deep-sea mining company in the high seas of the Pacific Ocean in November 2023.

### LANDSCAPES: No-go zones for mining

In 2023, several Bottom Line! partners have worked to refine their respective positions on No-go Zones for mining (NGZ) and align on this with other, national and international NGOs doing the same, like [Rainforest Foundation Norway](#) that is calling for a halt of mining expansions on forested areas, and for existing mining operations to respect all rights of local and indigenous communities, and [Mighty Earth](#) in order to come up with some strong joint advocacy messages.

**No-go zones for mining are areas where mining should not take place in order to safeguard the Earth's ecological safety and integrity, such as critical ecosystems, high-biodiversity areas, the deep sea, watersheds and areas important for food production, and areas prone to geo hazards or the impacts of climate change.**



Landscape Tompotika © Stephanie Broekarts/IUCN NL

Protecting and restoring the world's forests are central to the Sustainable Development Goals, the [Paris Agreement](#) and the goals of the Global Biodiversity Framework (the [Kunming-Montreal Agreement](#)). Furthermore, the EU and its member states, together with more than 140 other countries, are signatories of the [Glasgow Leaders' Declaration](#) on Forests and Land-use, and thus jointly committed to the goal of halting and reversing forest loss and land degradation by 2030.. The current practice of mining for transition minerals and other purposes is not in line with these international agreements.

We will continue to work on NGZ in 2024, and in parallel, pilot the NGZ concept in nickel & biodiversity hotspot Sulawesi and North Moluccas together with the Indonesian NGO [Auriga Nusantara](#). The process entails legal research, drafting a NGZ brief and discussing it in a broad stakeholder consultation process. Both the legal opinion, the final brief, and the resulting map will be presented to the Indonesian government at the end of 2024.

## Objective B: Governments and companies are transparent about mining permits and locations.



### GHANA: National debate on new lithium mining lease

In Ghana, the government's signature on a 15-year mining lease with Atlantic Lithium in Ewoyaa on the southern coast has generated serious debate, with many questioning the appropriateness of the details of the contract in relation to benefits for communities and the state, as well as value addition concerns (is the economic value of processing and use of the ore retained in Ghana?). ARG contributed to the national debate by supporting media agencies and actors to highlight the social and environmental safeguard issues. The debate is still very much alive in discussion with community groups, particularly the youth.

ARG intensified its engagement with the national Extractive Industries Transparency Initiative (EITI) in Ghana and participated at the EITI conference in Senegal to further highlight the risk that new mining ventures for transition minerals will bring. *"At the Conference in Dakar in June, we were able to initiate fruitful meetings with the Initiative for Responsible Mining Assurance (IRMA) through contacts established by our partner IUCN NL. Our participation also enabled us to connect with other Bottom Line partners and GLA partners from the Philippines engaged in mining advocacy, to exchange experiences"* says Daryl Bosu from A Rocha Ghana.

ARG pushed for discussions on transparency in extractives to not be only about what companies pay and what governments receive. The EITI standards should reflect environmental justice, a responsible extractives supply chain that not only benefits economies, but also improves the lives of people especially communities where mining takes place, and also and more importantly, addresses issues of environmental degradation. ARG further engaged in fora on mining transparency and use of mineral resources organised by the Ghanaian Africa Center for Energy Policy (ACEP).



### INDONESIA: Environmental Impact Assessment

In Sulawesi, ALTo managed to obtain copies of Environmental Impact Assessment (Amdal) documents for all but one of the nine mining companies that have received a mining concession in Tompotika forest. These will be studied and appropriate action taken to respond.



### PHILIPPINES: Stopping an illegal mine

ATM's campaign together with local communities successfully resulted in halting the illegal entry of a [nickel mine in a biodiversity hotspot in Sibuyan Island](#). Sibuyan residents had put up a barricade to stop the mining firm from operating, since the firm had not secured the necessary permits and documents for their mining activities. As of December 2023, there have been no reported mining operations inside the protected area. However, there are still operations in the buffer zone and the barricade still continues, since the mining firm's concession has not been formally canceled.



Sibuyan residents put up a barricade © ATM

## Objective C: Mining companies comply with environmental and human rights protection laws.



### INDONESIA: Engaging with companies and governments

In Sulawesi, AIto met and began building relationships with all nine mining companies operating and/or permitted in Tompatika. AIto also organized a large meeting in Luwuk for mining companies and government officials about the IRMA standards. There is considerable interest in IRMA on the part of mining companies and government officials, but very little knowledge of ways to improve practice.



### GLOBAL: IRMA Standard revision: stronger biodiversity safeguards

IUCN NL, together with several other international NGOs such as Rainforest Foundation Norway and Mighty Earth, provided input for Bottom Line! technical partner IRMA's [Draft Standard for Responsible Mining and Mineral Processing 2.0](#).



Nickle mining Tompatika © Stephanie Broekarts/IUCN NL

We were specifically asked for initial recommendations on the draft biodiversity chapter in the proposed update to the IRMA Standard, especially when it comes to avoiding harms related to deforestation. Our stand is that mining should not lead to deforestation, esp. in primary rainforest areas and other high biodiverse forests, and that forests should be explicitly included in biodiversity protection. Mining operations should respect all rights of local and indigenous communities. To ensure that the mitigation hierarchy is adequately applied, we stressed that the focus should be much more on ensuring the 'avoid' part of the mitigation hierarchy, by requiring that exploration and development take place on degraded land first and only on forest and other intact native ecosystem landscapes as a very last resort and under strict conditions. The revised IRMA Standard will be published before the end of 2024.



### PHILIPPINES: Emergency funds

In April 2023, IUCN NL provided emergency funds to cover the legal costs for the indigenous communities on the island of Palawan, Philippines, that were affected by legal cases filed by the nickel mining giant *Ipilan Nickel Corporation* against the peaceful protesters against the mine. This successfully led to the [Supreme Court ruling in favor of nature and indigenous rights](#). The indigenous communities, according to the Supreme Court statement, rightfully questioned multiple issues, including the illegal expansion of the mine in a protected area and the illegal cutting of trees. The Court found that the continued mining operations and excavation of nickel by INC may cause irreparable environmental damage to the rainforest and the indigenous territory as exhibited by extreme flooding and contamination of fishing areas.



## PATHWAY 2



**Circularity strategies, reduced consumption and enhanced use of recycled metals lead to reduction in use of virgin minerals.**

**From April 2023 to December 2023 we worked on the following to reduce consumption and enhance the use of recycled metals:**

**Objective D: Energy sectors only use responsibly sourced and recycled minerals and metals and implement strategies for circular economy activities.**



### **NETHERLANDS: Due diligence regulations**

As a member of the [IRBC Covenant on the Renewable Energy Sector](#), IUCN NL ensured that the environment and the position of indigenous peoples and local communities were well embedded in the assessment framework, to be used by the companies in their due diligence exercise. Consequently:

- companies have to investigate whether there are (potential) risks in their value chain relating to human rights violations and environmental damage.
- If such (potential) risks are identified, the company has to take steps to prevent and mitigate these risks.
- If such risks have already been realized, the company has to take remedial action.

IUCN NL, together with the NL Ministry of Foreign Affairs, organised a knowledge session on the updated OECD Guidelines, focussing on the chapter 'Environment' and the recently published [OECD Handbook on Environmental Due Diligence in Mineral Supply Chains](#). In this presentation we set out what the consequences of the update were for the companies with respect to their due diligence obligations. We also illustrated what the consequences of nickel mining were on the environment and Indigenous Peoples and local communities, amongst others by showing them the Tompotika video.

**Objective E: Governments set and enforce rules and incentives for responsible sourcing and circular economy activities.**



### **EUROPE: Critical Raw Materials Act and Corporate Sustainability Due Diligence Directive**

In 2023, focus on responsible mining increased among policy makers. On a European level, in the Critical Raw Materials Act (CRMA) the European Commission proposed a set of actions to ensure the EU's access to a secure, diversified, affordable and sustainable supply of critical raw materials. IUCN NL and some other Bottom Line partners provided [input to the EU CRMA](#) to include more protection for the environment and indigenous and local communities, as well as a push for more ambitious goals on circularity.

With the Corporate Sustainability Due Diligence Directive (CSDDD), the EU aims to foster sustainable and responsible corporate behaviour and to anchor human rights and environmental considerations in companies' operations and corporate governance. Together with the Dutch IMVO Platform, IUCN NL advocated for binding supply chain due diligence obligations that are in line with the OECD Guidelines and the United Guiding Principles. The current status is that the European Parliament will vote on the CSDDD at the end of April. In the event of a positive vote the Netherlands has to implement the Directive within two years after the Directive enters into force.



### **NETHERLANDS: National Raw Materials Strategy and ecocide bill**

In the Netherlands, IUCN NL provided input to the Commission on Economic Affairs and Climate on the National Raw Materials Strategy. With this Strategy the government focuses on availability of critical minerals and metals, circularity, alternatives for scarce materials and reducing the impact on people and the environment. IUCN NL shared a number of recommendations to further sharpen the strategy in the field of nature and human rights.

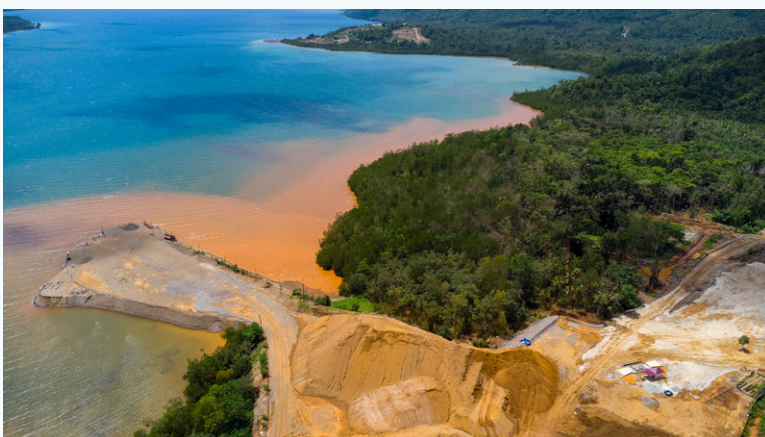
Furthermore, IUCN NL and ATM Philippines were informants for the Adviesraad Internationale Vraagstukken for their report on the impact of the energy transition on the environment and on IP&LCs. Parts of our inputs were adopted in the report.



### **NETHERLANDS: Dutch bill on ecocide**

The legal team of Stop Ecocide NL was closely engaged in the development of a Dutch bill to criminalise ecocide, the large-scale destruction of ecosystems. This bill was submitted in December 2023. IUCN NL contributed to the Bill by bringing in our ecological expertise in a session with the legal team working on the Bill to test and refine the draft law on the basis of a case study. The DSCC also submitted a statement as part of the public consultation of this bill.

This bill closely aligns with the EU agreement reached on November 16, 2023 on the revised environmental crime directive, that instructs member states to severely punish serious environmental crimes similar to ecocide. Once ecocide is recognised as a crime in Dutch criminal law, CEOs, for example, can be personally prosecuted for serious damage they willfully cause to nature, even if they had a permit for their environmentally damaging activities. This will greatly deter companies, preventing future serious environmental damage. On February 27, 2024, the revised Environmental Crime Directive (ECD) was successfully adopted by the European Parliament.



Nickle mining Tompotika, Sulawesi © Stephanie Broekarts/IUCN NL



Rosma picking up candlenuts, Sulawesi © Stephanie Broekarts/IUCN NL



### NETHERLANDS: Mocktrials on ecocide with Utrecht University

Conceptualizing ecocide calls for an approach that cuts across academic disciplines. Utrecht University therefore started a project that brings together academics and other stakeholders whose work touches on ecocide and its legal, ecological, scientific, political, sociocultural, criminological, philosophical, and historical dimensions. As part of this project, IUCN NL and Stop Ecocide NL are closely involved in setting up mock trials (simulations of a legal trial using real examples) in 2024 and 2025 that will test the arguments and definitions on ecocide, and experiment with artistic forms of representation. One of the fictional cases will be built around the large-scale ecological destruction caused by nickel mining and processing in Sulawesi.



### NETHERLANDS: Petition

In December 2023, we launched a joint Bottom Line! petition called 'Set limits on mining for a just energy transition' with an animation video with a voice-over by actress and Stop Ecocide ambassador Carice van Houten.



Watch the animation  
video [here](#)

The petition calls on the House of Representatives to stress the importance of a fair energy transition and system change in which circularity and less energy consumption are paramount; to urge the Government to ensure that mining does not lead to large-scale environmental destruction (ecocide) and human rights violations; and to join the alliance of countries calling for a moratorium on deep-sea mining.

The aim of the petition is twofold: we use it as a communications tool to raise awareness for the impact of transition minerals on nature and people and - if we get enough signatures - the petition will function as a lobby tool and it will be handed-over to members of the House of Representatives mid 2024. With the Bottom Line! petition as a conversation starter, together with VBDO, we reached out to financial institutions like ASN Bank and Triodos. As a result, ASN Bank is now supporting and promoting the petition.



### NETHERLANDS: Exploring the Dutch transition minerals arena

Natuur & Milieu used the first months of the project to conduct a thorough exploration of the current market dynamics, supply chains, and relevant policy developments related to raw material use in the wind energy and EV sectors, with a focus on circularity.



This resulted in two factsheets on a market exploration of metals for wind energy and electric transport, insights on opportunities and potential for reduction in use and circularity, threats and stakeholders within the raw materials chain, and an overview of relevant policies, legislation and regulations (EU/NL) and the current shortcomings therein. N&M has used all these to further develop and refine its intervention strategies, with focus on impact.

An interesting finding was that while circularity is mentioned in policy, actual measures at national or EU level to stimulate higher 'Waste hierarchy' strategies (refuse, rethink, reduce) are missing or vague. Most of the policy ambitions and measures are about recycling, and there is little about reducing material need & waste.

Batteries for electric vehicles have by far the most opportunities and potential for reduction in use and circularity, whilst at the moment there is almost no attention and no policy for this.

## **Objective F: Financial institutions only invest in best-practice and ecocide-free mining and circular economy alternatives.**



### **NETHERLANDS: Outreach to financials and investors**

In the period Sep-Dec 2023, technical partner VBDO and IUCN NL worked on the organisation of the seminar 'Responsible investing in the energy transition', that was held on February 29th, 2024, and attended by over 100 decision makers from the financial - and investments sectors. Bottom Line partner ATM was one of the presenters. More information about this successful event will be shared in next year's report.

VBDO, in close collaboration with the Rainforest Foundation Norway, successfully initiated an investor statement regarding nickel supply chains. The aim of this statement is collective engagement together with international investors to address the negative environmental and social impact of the entire Electric Vehicle (EV) nickel chain. The Statement is directed at companies (and their brands) in the downstream EV sector, which are selected for future engagement.

As of 18 March 2024, 31 investors have signed the statement to incorporate responsible mining practices and higher standards for environmental and social impact in nickel supply chains. The initiative is supported by several national and international NGOs, including Earthworks, Transport and Environment (T&E), Mighty Earth, Madani Berkelanjutan, Auriga, Fern, Climate Rights International, Forest Watch Indonesia, Satya Bumi, IUCN NL, and AidEnvironment.



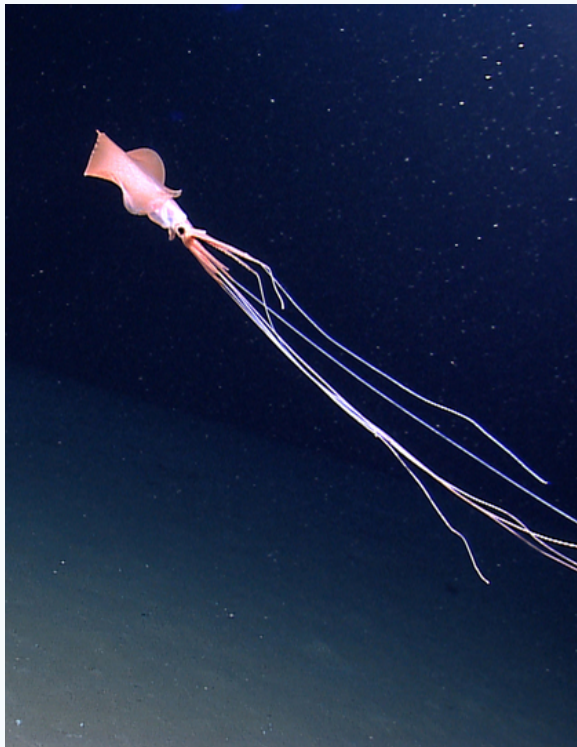
*'De milieu-impact wordt vaak niet meegenomen in het beleid voor de downstream toeleveringsketens van EV-batterijproducenten en EV-fabrikanten. We hebben niet alleen een energietransitie nodig, maar ook een verantwoorde. We verwachten van bedrijven dat ze verbeterde due diligence zullen uitvoeren voor biodiversiteit, vervuiling en klimaatverandering.'*

**Angélique Laskewitz, Executive Director van VBDO**



## DEEP SEA: Signed statement financial institutions against DSM

In July 2023, a group of 37 financial institutions, representing over €3.3trn of assets, urged governments not proceed with DSM through a statement signed with the Finance for Biodiversity Foundation.



Bigfin squid by NOAA Ocean Exploration  
on NOAA Ship Okeanos Explorer



A Chaunacops, © ROV SuBastian / Schmidt Ocean (Institute  
Attribution-NonCommercial-ShareAlike CC BY-NC-SA)

## Raising awareness for the impact of the energy transition

Raising awareness for the impact of the energy transition on people and nature in mineral rich landscapes, is an important crosscutting strategy in the Bottom Line! project. In 2023, activities as part of this strategy, in as far as not already mentioned under the pathways, included: presentations at the Resource Wende and ARTIS about the impact of nickel mining in Indonesia, an [ARTIS Planetary Health podcast](#) about nickel mining in Indonesia, the production and distribution of a [video about nickel mining in Tompotika, Sulawesi](#). A Vrij Nederland interview with experts from IUCN NL and ATM Philippines (to be published), a [website article](#) and social media posts highlighted the human rights impact of mining on communities in Tampakan, Philippines. The impact of mining on Ghana's Atewa forest and the millions of people depending on its ecosystem services was also highlighted on our [websites](#) and social media channels.

Stop Ecocide NL conducted a series of interviews with legal thought leaders, such as UN expert Rights of Nature [Jessica den Outer](#).

ARG brought in the topic of Transition Minerals at the [3rd Sustainable Development Conference](#). ARG's presentation entitled "Getting Ahead of the Threat: Transition Minerals and Nature Trade-off", generated spurred discussions among academia, policy makers both state and non-state actors as well as traditional authorities. For many, the issues of transition minerals and prospects were only just coming to their attention. Additionally, ARG contributed to panel discussions on "Promoting Sustainable Resource Extraction and Consumption: The Case of Surface Mining in Ghana."

ARG effectively mobilized and engaged with active youth groups like Green Africa Youth Organisation (GAYO), to explore opportunities for involving youth centered policies in the energy transition dialogue. Likewise, ATM also organized and strengthened a national youth network among ATM members and community partners in the Philippines. In its 1st General Assembly 90 young leaders crafted an declaration and action plan to intensify their engagement.

ATM produced a situationer report on transition minerals last Nov. 2023. A national-level learning session and trainors training is targeted to be completed by April 2024 and an ATM discussion paper on critical minerals will be produced by May 2024.

Several new reports [1] were published by DSCC member and partner organizations, highlighting from various angles why we don't need these minerals for the green transition.

Natuur & Milieu has started to address the crucial role of circular strategies for a successful energy transition. We are trying to change the Dutch public discourse to see the urgency and impact of raw materials and the need for circular strategies. For example by presenting as a speaker at Springtij, and by collaborating with Holland Circular Hotspot on a brochure on circularity and EV: vision and policy measures for reduced raw material usage for EV.



- [1] 1. Deep Sea Mining: assessing evidence on future needs and environmental impacts, EASAC, June 2023
2. Next Generation EV Batteries Eliminate the Need for Deep Sea Mining, Blue ClimateInitiative, 2023
3. The Climate Myth of Deep-Sea Mining, Planet Tracker, Dec 2023
4. To engage in deep-sea mining or not to engage: what do full net cost analyses tell us?, Sumaila et al, Nov 2023



# ANNEX: PUBLICATION HIGHLIGHTS

## Bottom Line! in the media



### Hoe de energietransitie tot ontbossing en geweld leidt

Dit verhaal is ook te beluisteren. Sinds enkele jaren worden de Filipijnen overspoeld door mijnbouwprojecten. Veruit de meeste mijnen zijn voor nikkel, waarvoor de Filipijnen de op één na grootste leverancier ter...

• Vrij Nederland / Mar 14



### Moet het oerwoud verdwijnen voor onze windturbines en batterijen? | Change Inc.

IUCN pleit voor verantwoorde mijnbouw zodat de winning van metalen voor windmolens, zonnepanelen, batterijen en elektrische auto's de planeet niet vernietigt

• change.inc



### Energy transition could reverse gains in conservation and climate change

Nature Africa - The development of renewable energies requires a balance between energy transition objectives and sustainable environmental practices in Africa.

• nature / Sep 1, 2023

[Read article on vn.nl](#)

[Read article on Change.inc](#)

[Read article on nature.com](#)

## Social media highlights Stop Ecocide NL



We willen allemaal dat de energietransitie zo snel mogelijk gebeurt.

### [Video] Lammert van Raan on LinkedIn: Deze is erg de moeite van ondertekenen waard. Mijnbouw in al haar...

Deze is erg de moeite van ondertekenen waard. Mijnbouw in al haar vormen is cruciaal voor energietransitie. En er is altijd een 'maar'. Osk hier. Doorgaan...

• linkedin / Dec 14, 2023

- [Arita Baaijens](#)
- [Lammert van Raan](#)
- [Marjolein Jonker](#)
- [Benedicte Ficq](#)

## Blogs by Stop Ecocide NL ambassadors



Stop Ecocide NL ambassadeur Jessica den Outer is jurist en een van de jongste experts bij de Verenigde Naties op het gebied van de rechten voor de natuur. Zij is de gevierde schrijfster van het boek 'Rechten voor...

• Stop Ecocide NL / Sep 1, 2023

[Read](#)



Toen Lammert van Raan 10 jaar geleden voor het eerst over ecocidewetgeving las, omarmde hij het idee gelijk. Sinds zijn komst in de Tweede Kamer als Partij voor de Dieren kamerlid in 2017 zet hij zich...

• Stop Ecocide NL / Oct 31, 2023

[Read](#)



Raki Ap werd in 1984 geboren in een vluchtelingenkamp in Papoea-Nieuw-Guinea. Zijn vader, antropoloog en muzikant Arnold Ap, was vier maanden eerder vermoord vanwege zijn protestliedjes die veel...

• Stop Ecocide NL / Nov 9, 2023

[Read](#)



Jan van de Venis is jurist en een veelgevraagde spreker over mensenrechten en duurzaamheid. Als waarnemend Ombudspersoon Toekomstige Generaties en expert van de Verenigde Naties op het gebi...

• Stop Ecocide NL / Dec 12, 2023

[Read](#)

## Social media highlights



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