



20 YEARS OF


**Business & Human Rights  
Resource Centre**



# Fuelling injustice

**TRANSITION MINERAL IMPACTS IN  
EASTERN EUROPE & CENTRAL ASIA**

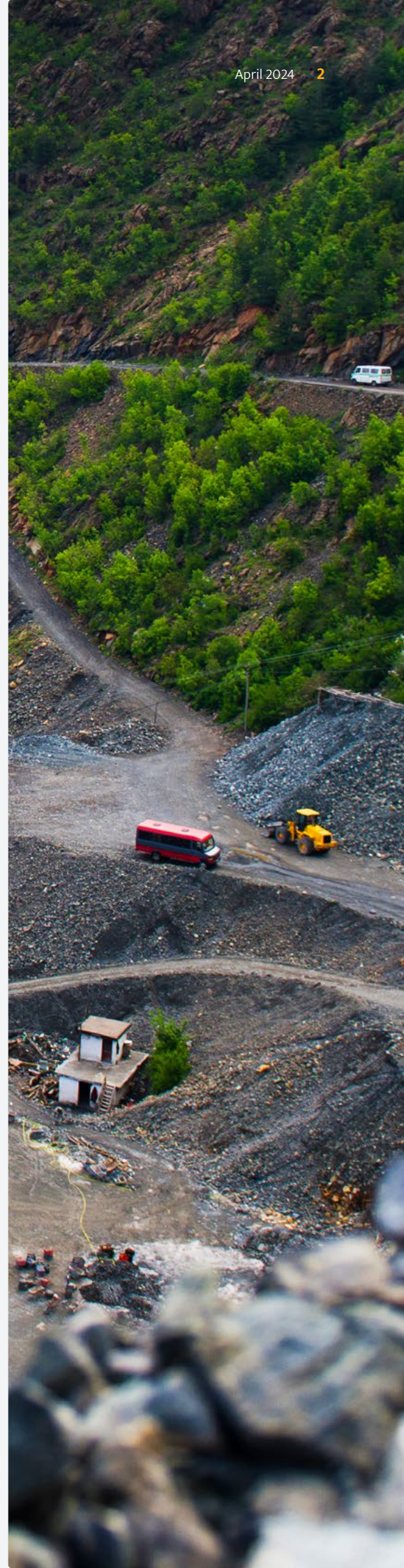
APRIL 2024





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# Executive summary

With the frightening acceleration of global warming, the climate crisis is rapidly becoming the single greatest threat to human rights. The urgent need for a fast transition to clean energy has driven a boom in demand for transition minerals. Eastern Europe and Central Asia (EECA) is emerging as a new hotspot for transition mineral extraction and supply, primarily due to its vast deposits of minerals including manganese, chromium, lead, zinc, copper and titanium.

Rising geopolitical tensions and conflicts, such as Russia's military aggression against Ukraine, present a heightened obstacle to advancing the green agenda, including disruptions in the global supply of transition minerals. Russia and Ukraine are both [home to large deposits](#) of minerals critical to the energy transition, such as rare earth elements and lithium. Russia's war has forced Western countries, particularly in the European Union (EU), to reduce their dependence on Russia's fossil fuels and China's minerals – and to diversify their supply of transition minerals by building strategic partnerships with countries in the EECA region which have significant transition mineral reserves.

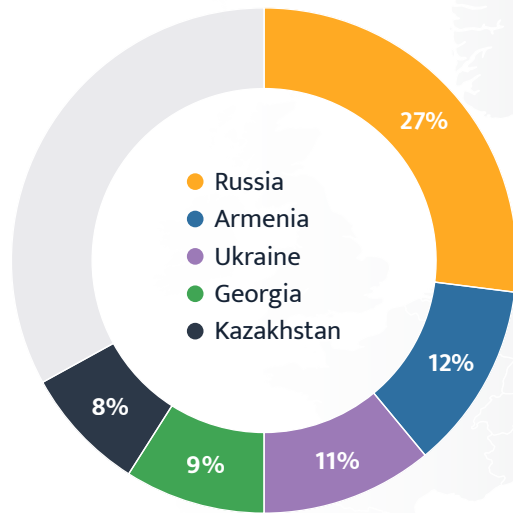
This briefing exposes the scale and severity of human rights abuses and environmental damage caused by companies mining and processing transition minerals in EECA. Over the last five years (2019-2023 inclusive), the Business & Human Rights Resource Centre (the Resource Centre) tracked publicly reported allegations of environmental and human rights abuses linked to mining project development, extraction and processing (smelting and refining) of transition minerals in EECA. We have identified **421 allegations** of abuse linked to **20 transition minerals** in **16 EECA countries**: Albania, Armenia, Azerbaijan, Bosnia & Herzegovina, Bulgaria, Georgia, Kazakhstan, Kosovo, Kyrgyzstan, North Macedonia, Montenegro, Russia, Serbia, Tajikistan, Ukraine and Uzbekistan.

A just transition to clean energy must centre on three core principles: shared prosperity, human rights and social protection, and fair negotiations. However, based on the findings of our research, all three principles are missing when it comes to transition minerals project development, extraction and processing in EECA. Significant changes are urgently needed in the EECA mining sector to ensure the transition to clean energy is not achieved at the expense of people and the environment.



# Key findings

TOP 5 COUNTRIES WITH THE HIGHEST NUMBERS OF ALLEGATIONS



Eight out of the top 10 companies with the highest numbers of allegations are **owned by oligarchs**.



Nearly half of the allegations concerned **human rights abuses against workers** (185 or 44%), while a similar proportion (178 or 42%) involved abuses against communities.



**Copper** accounted for 151 allegations, or 35% – making it the mineral with the highest number of allegations. Copper extraction related allegations were recorded in 11 countries.



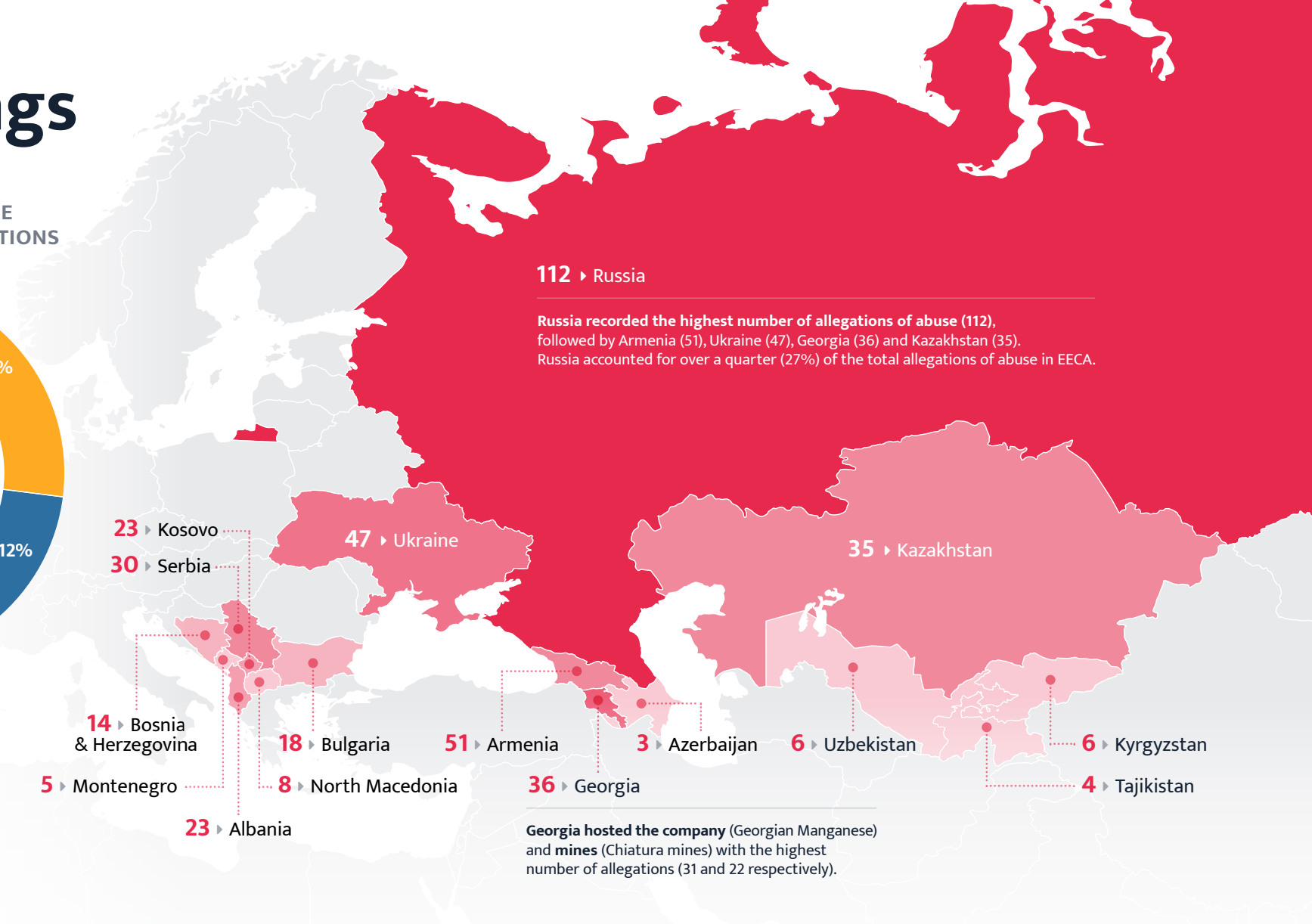
A third of allegations (139) involved **environmental harm** predominantly affecting communities, where water pollution (52 or 29%), air pollution (48 or 27%) and soil pollution (39 or 22%) were the top three impacts recorded.



**Occupational health & safety issues** were recorded in 64% (118) of all impacts on workers, followed by workplace deaths (52 or 28%). Kazakhstan accounted for 43% of all allegations linked to occupational health and safety.



66 allegations (16%) were linked to **protests by communities or workers**. Attacks on human rights defenders opposing mining projects were recorded in Armenia, Azerbaijan and Serbia.



112 ▶ Russia

Russia recorded the highest number of allegations of abuse (112), followed by Armenia (51), Ukraine (47), Georgia (36) and Kazakhstan (35). Russia accounted for over a quarter (27%) of the total allegations of abuse in EECA.

23 ▶ Kosovo

30 ▶ Serbia

47 ▶ Ukraine

35 ▶ Kazakhstan

14 ▶ Bosnia & Herzegovina

18 ▶ Bulgaria

51 ▶ Armenia

3 ▶ Azerbaijan

6 ▶ Uzbekistan

6 ▶ Kyrgyzstan

5 ▶ Montenegro

8 ▶ North Macedonia

36 ▶ Georgia

4 ▶ Tajikistan

23 ▶ Albania

Georgia hosted the company (Georgian Manganese) and mines (Chiatura mines) with the highest number of allegations (31 and 22 respectively).

# Context

As countries around the world strive to reduce carbon emissions to meet green transition goals, the demand for transition minerals is rapidly increasing. Previously neglected in global analyses of transition minerals, the EECA region is becoming a new hotspot for transition mineral extraction and supply. Due to abundant reserves of these minerals now critical to a fast transition to clean energy.

For example, Kazakhstan has the world's [largest reserves](#) of chromium, second-largest reserves of uranium and fifth-largest zinc reserves. It is the largest producer of [rare earth elements](#) (REEs) in the region. Ukraine has the [fifth-largest reserves](#) of manganese ore in the world and is the seventh-largest producer of manganese. According to [some studies](#), Ukraine has the largest supply of recoverable rare earth resources in Europe, even though much of it is undeveloped. It also has significant iron ore and titanium deposits. Russia has the [fourth-largest reserves](#) of rare earth minerals in the world. It is also the sixth-largest producer of copper globally and a major global supplier of palladium, scandium and titanium, as well as an important seller of nickel and cobalt.

The demand for transition minerals in the region is further driven as major consumers of transition minerals, such as the EU, are dependent on other countries to obtain them. According to some [estimates](#), the EU will need 21 times more lithium and 4.5 times more rare earths metals by 2030 – and 5.5 times by 2050. To overcome its dependence on China, the EU is seeking to ensure a sustainable supply of critical raw materials from other countries. The Critical Raw Materials Act (CRMA) was [designed](#) to ensure the EU's access to such supply to enable Europe to meet its 2030 climate and digital objectives; 'strategic partnerships' on raw materials with resource-rich countries are crucial components of CRMA. So far, the EU has signed strategic partnerships with three EECA countries: [Ukraine](#), [Kazakhstan](#) and [Uzbekistan](#). Civil society organisations are already raising [concerns](#) about issues related to existing partnerships, including lack of transparency and consultation with local communities and non-governmental organisations (NGOs) during partnership negotiations, insufficient human rights protection safeguards and responsible business conduct requirements. Given the vast reserves of critical minerals in other countries of the region, we can expect to see more partnership agreements signed with other EECA countries soon. At the same time, recent research [suggests](#) options to reduce such high demand by introducing effective policies on car production, public transport and mineral recycling.

The hunt for transition minerals not only impacts human rights and the environment but can also fuel conflicts. Some experts [argue](#) one of the goals of Russia's military aggression against Ukraine is to seize its rich natural resources, including lithium, titanium and rare earths, which are essential to fuel decarbonisation of Western countries. Control over materials, without which the green transition is impossible, would expand Russia's opportunities to put pressure on the West. Despite this, the EU continued to [purchase](#) critical raw materials worth billions of euros from the aggressor state, setting a dangerous precedent.

# Methodology

The EECA transition minerals tracker captures publicly reported allegations of environmental and human rights abuses related to companies extracting and processing (smelting and refining) transition minerals in the EECA region.

The term '**allegation**' refers to publicly reported allegations of specific incidents of alleged abuse by a company, including publicly reported attacks against human rights defenders working on corporate issues.

## **One allegation can be associated with multiple impacts.**

For example, an incident of soil pollution may have other impacts, including protests, impacts on health or livelihoods of local communities.

All allegations are linked to companies. Most allegations include names of projects (mines, smelters, refineries) where the alleged abuses took place. Allegations not linked to a particular place do not mention projects.

The allegations are primarily collected from articles and NGO reports. The tracker is predominantly based on materials available in English and Russian. The inclusion of companies in this report is not to be understood in all cases as meaning that a finding of guilt or liability has been made against them by an investigative or judicial authority. Companies referred to in this report were invited to comment. The replies received from companies that responded can be found [here](#).

The EECA region covered in this research covers 23 countries: Albania, Armenia, Azerbaijan, Belarus, Bosnia & Herzegovina, Bulgaria, Croatia, Estonia, Georgia, Kazakhstan, Kosovo, Kyrgyzstan, Latvia, Lithuania, Macedonia, Moldova, Montenegro, Russia, Serbia, Tajikistan, Turkmenistan, Ukraine and Uzbekistan.

We did not find any publicly available allegations linked to transition minerals in the following seven EECA countries: Belarus, Croatia, Estonia, Latvia, Lithuania, Moldova and Turkmenistan.



The following **20 minerals** are included in this research: aluminium/bauxite, antimony, beryllium, chromium, cobalt, copper, graphite, iron, lead, lithium, manganese, molybdenum, nickel, platinum, rare earth, silver, tin, titanium, uranium and zinc. These minerals play an important role in the energy transition and will be referenced in this report as ‘transition minerals’. This is an expanded list from the key transition minerals our [Global Tracker](#) covers.

Our methodology is built on the foundation of the Resource Centre’s Transition Minerals Tracker [methodology](#). The following table illustrates the main differences between the two methodologies.

▼ EECA Transition minerals tracker			▼ Global Transition Minerals Tracker	
<b>Scope of minerals:</b>				
<ul style="list-style-type: none"> <li>▶ Aluminium/Bauxite</li> <li>▶ Antimony</li> <li>▶ Beryllium</li> <li>▶ Chromium</li> <li>▶ Cobalt</li> <li>▶ Copper</li> <li>▶ Graphite</li> </ul>	<ul style="list-style-type: none"> <li>▶ Iron</li> <li>▶ Lead</li> <li>▶ Lithium</li> <li>▶ Manganese</li> <li>▶ Molybdenum</li> <li>▶ Nickel</li> <li>▶ Platinum</li> </ul>	<ul style="list-style-type: none"> <li>▶ REEs</li> <li>▶ Silver</li> <li>▶ Tin</li> <li>▶ Titanium</li> <li>▶ Uranium</li> <li>▶ Zinc</li> </ul>	<ul style="list-style-type: none"> <li>▶ Bauxite (from 2024)</li> <li>▶ Cobalt</li> <li>▶ Copper</li> <li>▶ Lithium</li> </ul>	<ul style="list-style-type: none"> <li>▶ Manganese</li> <li>▶ Nickel</li> <li>▶ Zinc</li> </ul>
<b>Phases in mineral supply chain:</b>				
<ul style="list-style-type: none"> <li>▶ Development</li> </ul>	<ul style="list-style-type: none"> <li>▶ Mining</li> </ul>	<ul style="list-style-type: none"> <li>▶ Processing</li> </ul>	<ul style="list-style-type: none"> <li>▶ Mining</li> </ul>	
<b>Scope of companies/business actors:</b>				
All relevant business actors operating in Eastern Europe and Central Asia			Larger, named mining companies regardless of location of headquarters, owning and operating top-producing mines	

## Limitations

- ➔ **Repressive environments.** In many countries in EECA, various forms of repression are used to silence independent journalists and human rights defenders, inhibiting their ability to investigate human rights abuse and environmental destruction and seek accountability. This consequently hinders public availability of information.
- ➔ **Language limitations.** Publicly reported allegations were identified in 16 EECA countries, each with its own language. The researchers working on this report are fluent in only two of these languages: Russian and Ukrainian. Therefore, research on the remaining 14 countries was primarily conducted in English, which may have limited the number of allegations identified in these countries.

# ALLEGATIONS TRACKER: Key findings

Over the past five years (2019-2023 inclusive), the Resource Centre tracked publicly reported allegations of environmental and human rights abuses linked to mining project development, extraction and processing (smelting and refining) of transition minerals in EECA. We have identified **421 allegations** linked to **20 transition minerals** in **16 countries**: Albania, Armenia, Azerbaijan, Bosnia & Herzegovina, Bulgaria, Georgia, Kazakhstan, Kosovo, Kyrgyzstan, North Macedonia, Montenegro, Russia, Serbia, Tajikistan, Ukraine and Uzbekistan.

## Geography of abuses

We researched **23 EECA countries** and identified alleged abuses in **16** of them. The highest numbers of allegations were recorded in **Russia (112)**, followed by **Armenia (51)**, **Ukraine (47)**, **Georgia (36)** and **Kazakhstan (35)**. Russia accounted for over a quarter (27%) of all allegations. Of 112 allegations recorded in **Russia**, 32 (29%) were linked to occupational health and safety and 21 (19%) to workplace deaths. Kazakhstan had the same top two issues as Russia, but at a larger scale since the allegations linked to occupational health and safety constituted 43% of the total number, and workplace deaths 26%. **Armenia** had the second largest number of allegations, even though it is one of the smallest countries in the region. Of 51 allegations identified in Armenia, the highest number (10 allegations) related to soil pollution. In **Ukraine**, the top issue associated with allegations was air pollution (14 allegations). Finally, the top issue recorded in **Georgia** was occupational health and safety, with nine associated allegations recorded.

We did not find any publicly available allegations linked to transition minerals in the following **seven EECA countries**: Belarus, Croatia, Estonia, Latvia, Lithuania, Moldova and Turkmenistan.

## ALLEGATIONS BY COUNTRY





# Environmental and human rights impacts\*

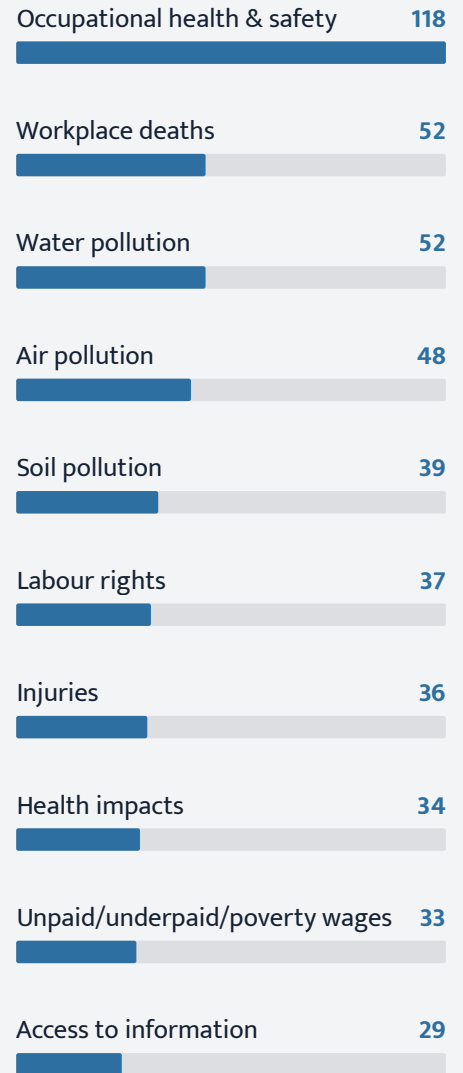
**Workers and communities** were the two most affected groups. One hundred and eighty-five (44%) allegations were associated with impacts on workers and 178 (42%) related to impacts on communities.

**Occupational health and safety violations** accounted for 64% of all impacts on workers. **Workplace deaths** were associated with 28% of allegations impacting workers. This was followed by **labour rights issues** (20%), which included, among other issues, unpaid and underpaid wages, access to information about terms of work contracts, workplace discrimination, long working hours and violations of freedom of association, and **workplace injuries** (19%).

In **Kazakhstan**, inspections conducted by authorities at Vostoksvetmet and Kazzinc found [1,200 labour and industrial safety violations](#), while in **Russia**, [145](#) and [206](#) violations of industrial safety regulations were detected at Lebedinsky mining and processing plant and Zapolyarny mine respectively.

\* Each allegation can be associated with more than one impact. Figures represent the number of times an impact was recorded across 421 allegations.

## TOP 10 ENVIRONMENTAL AND HUMAN RIGHTS IMPACTS



Communities were mostly affected by **environmental impacts**. Water pollution accounted for 29% of all impacts on communities, closely followed by air pollution (27%) and soil pollution (22%).

Twenty-eight (16%) allegations were associated with **impacts on livelihoods of local communities**. These included roads destroyed by open quarries, damaged or collapsed houses, pollution of agricultural and grazing lands, and water contamination.

In **Armenia** and **Georgia**, residents complained about harm to their houses caused by activities at [Agarak Copper Molybdenum Combine](#) and [mines of Georgian Manganese](#). Cracks emerged on the walls and the risk of collapse appeared. In **Ukraine**, environmentalists raised concern over harms caused by the [Lemnensky mine](#) on the livelihoods of local residents. [According to the activists](#), the landscape in the vicinity of the facility has been changed drastically: the forest has been cut down, the fertile soil layer removed, huge quarry dumps formed, wells in nearby villages have dried up and water in lakes has become “dead”.

**Protests by workers or communities** were linked to 66 (16%) allegations. In most cases, communities were protesting companies or projects over environmental and health concerns. Workers’ protests were primarily related to occupational health and safety issues, underpaid/unpaid wages and other labour rights issues, including poor working conditions.

In **Ukraine**, workers at Inhulska, Novokostyantynivska and Smolinska uranium mines [blocked roads](#) in Kirovograd region, protesting over wage arrears. They were owed UAH87mn (almost EUR2mn) in wages. In **North Macedonia**, local residents were opposing [Ilovica-Shtuka copper mining project](#) for years, claiming its opening would pollute an artificial lake which irrigates the field and provides drinking water to the surrounding villages.

Allegations associated with **access to information** mostly related to companies concealing information on environmental impacts or pollution caused by their operations, as well as health and safety violations and workplace accidents.

In **Russia**, [Ural Mining and Metallurgical Company](#) was accused of concealing information about what had caused the ore smoldering in Sibayskoye deposit, which resulted in a toxic smog polluting the air in Sibai city. [GeoProMining](#) allegedly concealed information about pollution of Sentachan and Adycha rivers caused by the failure of a sedimentation dam belonging to its subsidiary JSC Zvezda. An administrative case was opened. According to [Norilsk Nickel](#) workers, the company concealed information about health and safety violations, as well as workplace accidents. Names of workers killed in the accidents are not disclosed and workers are allegedly prohibited from communicating with the press.

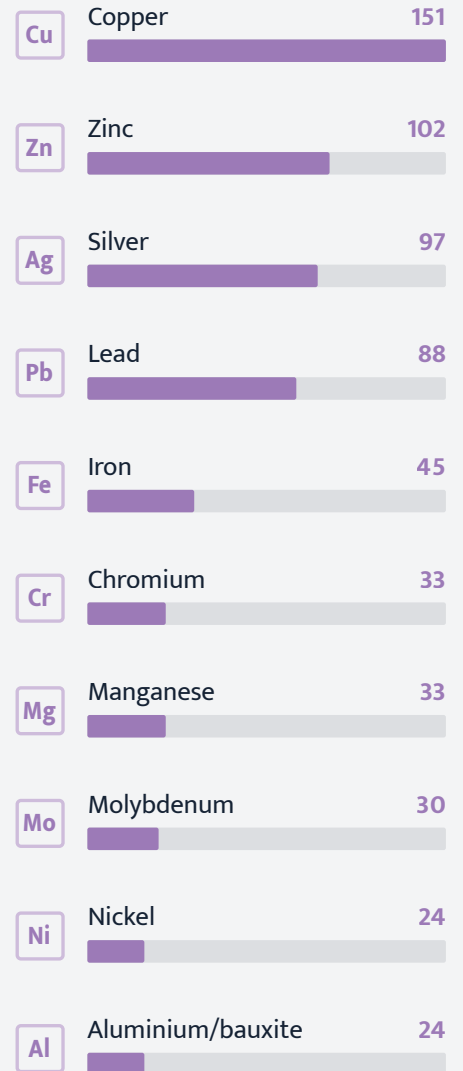


# Allegations by mineral

**Copper** was associated with 151 allegations, which constituted 36% of all allegations. It was followed by **zinc** (102), **silver** (97), **lead** (88) and **iron** (45). Allegations linked to **copper** were identified in **11 countries**: Armenia, Azerbaijan, Bosnia & Herzegovina, Bulgaria, Georgia, Kazakhstan, Kyrgyzstan, North Macedonia, Russia, Serbia and Uzbekistan. **Zinc** and **silver** were associated with allegations identified in eight countries. Allegations linked to **lead** were found in 11 countries. Over 70% of allegations associated with iron ore were found in **Ukraine**, with a remaining small percentage identified in **Russia** and **Kazakhstan**.

It should be noted that some mines included in this research extract more than one mineral. For example, both nickel and copper are extracted in **Taimyrsky mine** in **Russia**, owned by **Norilsk Nickel**. Lead and zinc are extracted in **Brskovo mine** in **Montenegro** owned by **Tara Resources**. Based on publicly available information, it was not possible to determine which mineral an allegation is linked to in cases where more than one mineral is being extracted in the same mine. Therefore, in such cases, minerals were counted more than once.

## TOP 10 MINERALS WITH THE HIGHEST NUMBERS OF ALLEGATIONS



# Allegations by project

## Development and extraction (mines)

The highest number of allegations (22) were linked to **Chiatura manganese mines** owned by **Georgian Manganese**. The issues included occupational health and safety, impacts on livelihoods, labour rights issues and environmental pollution. Some were highlighted in the UN Working Group on Business and Human Rights' [report](#) during its visit to Georgia in 2019. The second largest number of allegations is associated with **Bulqiza mine** (19) in **Albania**, owned by **AlbChrome**, followed by **Amulsar gold and silver deposit** (12) in **Armenia**, owned by **Lydian Armenia**. Sixty-eight per cent (13) of allegations linked to **Bulqiza mine** related to occupational health and safety. Six miners were killed and more injured in the mine over the last five years. Allegations related to **Amulsar mine** mostly concerned environmental pollution and [persecution](#) of activists opposing the project.

## Processing (smelting and refining)

Five smelters and metallurgical plants had the highest number of allegations (five allegations each) associated with their operations: **Aurubis smelter (Bulgaria)**, **Nadezhda metallurgical plant (Russia)**, **Sayanogorsk aluminium smelter (Russia)**, **Irshansky mining and processing plant (Ukraine)** and **Aktyubinsk Ferroalloys Plant (Kazakhstan)**. These allegations were linked to a wide range of issues, including access to information, underpaid/unpaid wages, environmental pollution and occupational health and safety.

All allegations linked to **Sayanogorsk aluminium smelter** were associated exclusively with deaths, injuries and occupational health and safety issues. The smelters and plants in the top five are followed by two plants with four allegations each: **Kachkanar mining and processing plant (Russia)** and **Kryvyi Rih plant (Ukraine)**. Allegations linked to these plants were also associated with a range of issues, including environmental pollution, occupational health and safety issues, health impacts, workplace deaths, poverty wages, intimidation and corruption.





## Allegations by company

The highest number of allegations (31) was associated with **Georgian Manganese**, [owned](#) by Georgian American Alloys, registered in Luxembourg. The majority share of the company belongs to Ukrainian billionaire [Igor Kolomoisky](#). In May 2017, a special manager [was appointed](#) in the company by the Georgian Government to address and mitigate significant damage caused by company operations to the environment.

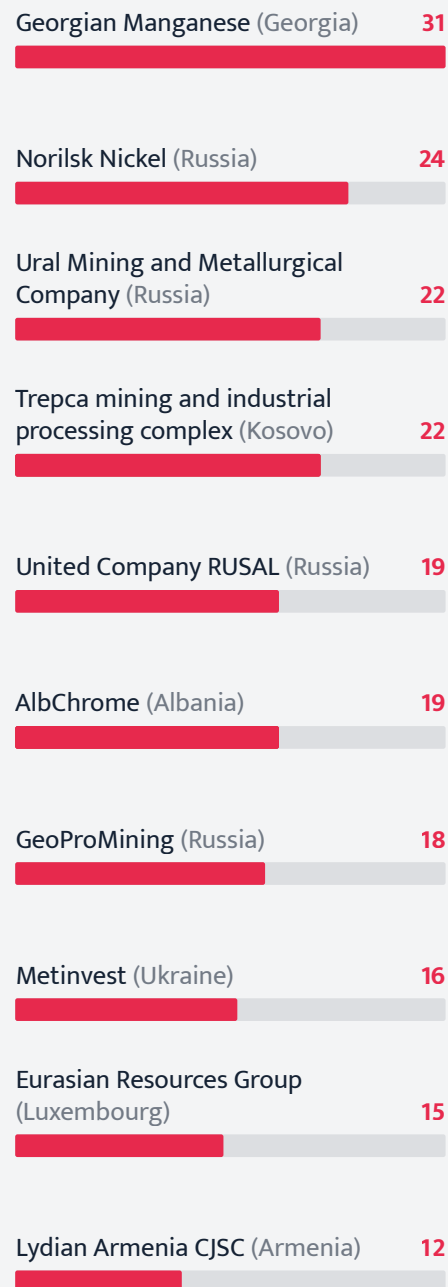
The second place was occupied by Russian company **Norilsk Nickel** (24), the largest producer of nickel and palladium in the world. The company is owned by Russia's former First Deputy Prime Minister turned businessman, [Vladimir Potanin](#).

It is followed by another Russian company, **Ural Mining and Metallurgical Company**, with 22 allegations. The company is owned by Uzbek billionaire [Iskander Makhmudov](#). **Trepca mining and industrial processing complex** is also linked to 22 allegations and is [owned](#) by the Government of the Republic of Kosovo.

Next on the list are **United Company RUSAL** and **AlbChrome**, with 19 allegations each. **RUSAL** is the world's second-largest aluminum producer after China. It belongs to Russian billionaire [Oleg Deripaska](#), who has been sanctioned by the EU. **AlbChrome** is an Albanian company owned by a Turkish company **Yilmaden Holding**, which is part of [Yildirim Group](#), that belongs to Turkish billionaire brothers Ali Riza and Robert Yuksel Yildirim.

Of the remaining four companies in the top ten, three are owned by powerful businessmen with close connections to politicians: **GeoProMining** [belongs](#) to Russian billionaire Roman Trotsenko's son, **Metinvest** belongs to Ukrainian billionaire [Rinat Akhmetov](#) and **Eurasian Resources Group** is [owned](#) by a group of billionaires together with the Republic of Kazakhstan. The last on the list, **Lydian Armenia**, is a [subsidiary](#) of Lydian Canada Ventures, owned by US firm Orion Mine Finance and Canadian firm Osisko Gold Royalties.

### TOP 10 COMPANIES WITH THE HIGHEST NUMBERS OF ALLEGATIONS



# Access to remedy

Our findings show workers and local communities face multiple barriers to accessing remedy and holding companies accountable for human rights and environmental abuses. In **Albania**, workers at the **Bulqiza mine** [complained](#) about the lack of compensation for accidents which occurred at their workplace, while in **Georgia**, residents of Shukruti village [started a hunger strike](#), protesting against uncompensated damage to their homes caused by **Georgian Manganese's** activities.

In some countries, residents faced obstacles in access to judicial remedies put in place by state representatives. In **Russia**, local communities [appealed to the authorities](#) over the development of a copper mine by **Bashkirskaya Med** in close proximity to their houses. A criminal case was initiated, but later closed by a [Deputy Prosecutor](#) of the Republic of Bashkortostan as he allegedly believed there was no basis for opening the case. Following the closure of the case, the residents appealed to the Prosecutor General of Russia. They are still awaiting a response.

In **Kyrgyzstan**, local communities complained criminal cases against **Kichi Chaarat** for violating environmental standards in the construction of tailings dumps [were not completed](#) due to the interference of high-ranking officials with vested interests in the process. The communities also pointed out that although a commission from the State Ecological and Technical Inspectorate [visited the company's tailings dump](#), it avoided meeting them and never released the findings of the inspection.

In most countries, our research revealed powerful businessmen with close links to politicians are involved in, or own, major extractive companies. This further undermines workers' and communities' ability to seek remedy.

For example, when environmental activists in **Kazakhstan** turned to the Ministry of Ecology to [conduct an inspection](#) at **Aktyubinsk Ferroalloys Plant** over environmental pollution concerns, the Ministry claimed the inspection had already been carried out and the company had been held to account regarding its administrative responsibilities. However, the activists insist all acts, orders and administrative fines were drawn up without visiting the enterprise. **Aktyubinsk Ferroalloys Plant** is [owned](#) by **Kazchrome**, which [belongs](#) to **Eurasian Resources Group**. Sixty per cent of the company's shares [belong](#) to influential businessmen (Alexander Machkevitch, Patokh Chodiev and the heirs of the late Alijan Ibragimov) and the remaining 40% are [owned](#) by the Republic of Kazakhstan.

In **Russia**, **Kachkanar Mining and Processing Plant** [received land](#) to increase the area of its tailings dump, despite pollution caused to the soil (the company [was fined](#) RUB240mn), and thereby moved closer to houses of the village of Valerianovsk. According to a member of the Kachkanar city council, the company received the land thanks to [lobbying efforts](#) by its parent company Evraz. Russian billionaire [Roman Abramovich](#) is one of the significant shareholders of the company.



# Conclusion and recommendations

While the rapid transition to clean energy is essential for the survival of our planet, it cannot be achieved through the abuse of people and the environment. This would be self-defeating. Paradoxically, our findings highlight how workers, local communities and the environment are paying the price for the energy transition in the EECA region. Transformation of existing business models in the EECA extractive sector is urgently needed to ensure the transition to clean energy is just and sustainable.

## Three core [Just Energy Transition Principles](#) provide a road map for such transformation:

- ➔ **Shared prosperity:** Effective business models driving fast transitions will build trust and stability to reduce systemic risk through shared prosperity models that build worker and community rights in companies' operations and supply chains.
- ➔ **Human rights and social protection:** Governments and companies have a duty of care to shield workers and communities from harm; to demonstrate due diligence to minimise human rights and environmental risks; and to ensure social protection, retraining and decent work.
- ➔ **Fair negotiations:** Communities and workers need guarantees that negotiations will be fair throughout operational life-cycles and when accessing remediation for harm. There will be inclusive community consultation and robust implementation of the principles of Free, Prior, and Informed Consent (FPIC) for Indigenous Peoples; and guarantees that workers, Indigenous and community leaders will not be silenced through intimidation or violence.

## Recommendations to companies:

- ➔ Implement effective human rights and environmental due diligence, with strong community and worker engagement, to identify human rights and environmental risks throughout operations and supply chains. Conduct heightened human rights [due diligence in challenging business environments](#), especially where civil or international conflict is possible.
- ➔ Ensure early and timely access to information for affected rights-holders to allow for effective engagement in the full project cycle from co-design to installation, operation and closure.
- ➔ Ensure adequate labour protection and safe working conditions for workers. Respect international standards that protect workers' rights to organise, safety and a living wage, especially where national laws fall short.
- ➔ Establish grievance mechanisms, built on worker and community engagement. Ensure such mechanisms are accessible, predictable, equitable and transparent for rights holders adversely affected by business operations.

## **Recommendations to governments in EECA:**

- ➔ Commit to just transition principles to deliver shared prosperity, human rights due diligence and fair negotiations, insisting on the inclusion of workers' organisations and local and Indigenous communities throughout the project life cycle.
- ➔ Guarantee transparency and access to information for all stakeholders about the process of licence granting to mineral development (especially when permission process is accelerated), extraction and processing.
- ➔ Monitor companies' compliance with safety and environmental standards to prevent human rights violations and environmental pollution and hold companies accountable.
- ➔ Ensure judicial and non-judicial mechanisms to provide effective remedy for business-related abuses.
- ➔ Identify corruption risks and provide efficient mechanisms for investigation, prosecution and remediation of corruption cases, paying special attention to situations which involve political elites to prevent them from using the green transition as means of personal enrichment and influencing investigative institutions.

## **Recommendations to governments of purchasing countries and those signing strategic partnerships with EECA countries:**

- ➔ Ensure transparency and effective consultation with local communities and NGOs during partnership negotiations, robust human rights protection safeguards and responsible business conduct requirements.

## **Recommendations to investors and financial institutions:**

- ➔ Commit to rights-respecting investments with board oversight. Undertake analysis consistent with the UNGPs and OECD Guidelines for human rights and environmental risks related to all transition minerals mining investments. Evaluate risks and impacts of investee companies on people and the planet, alongside financial materiality.
- ➔ Undertake human rights impact assessments as part of the due diligence process prior to financing mining projects. Use leverage to ensure investee companies respect human rights throughout the project life cycle and put in place appropriate safeguards to minimise human rights and environmental risks associated with the project.
- ➔ Ensure mining projects are designed transparently and with the effective participation of all stakeholders, including affected groups, as well as broader civil society.





## **Business & Human Rights Resource Centre**

**APRIL 2024**

**Business & Human Rights Resource Centre** is an international NGO which tracks the human rights impacts of over 10,000 companies in over 180 countries, making information available on our 10-language website.

**AUTHORS:** Ella Skybenko and Vladyslava Kaplina