Aligning UK critical mineral policies with the human rights and environmental priorities of devolved nations

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Friends of the Earth Scotland

Friends of the Earth England, Wales & Northern Ireland

TRADE JUSTICE MOVEMENT

london mining network

COMMON WEAL

Contents

This report was written by Friends of the Earth Scotland, Friends of the Earth England, Wales and Northern Ireland, the Trade Justice Movement, Common Weal, and the London Mining Network.

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Summary

Critical minerals policy areas span reserved and devolved powers, but the strategic approach has been strongly driven by Westminster, overlooking the different priorities of Northern Ireland, Scotland, and Wales. This has led to inefficient and unfair policies around planning, energy, and trade. The social and environmental impacts of critical mineral extraction are often serious and extensive, and this means that when UK plans fail to account for devolved concerns, the consequences for people and nature can be devastating.

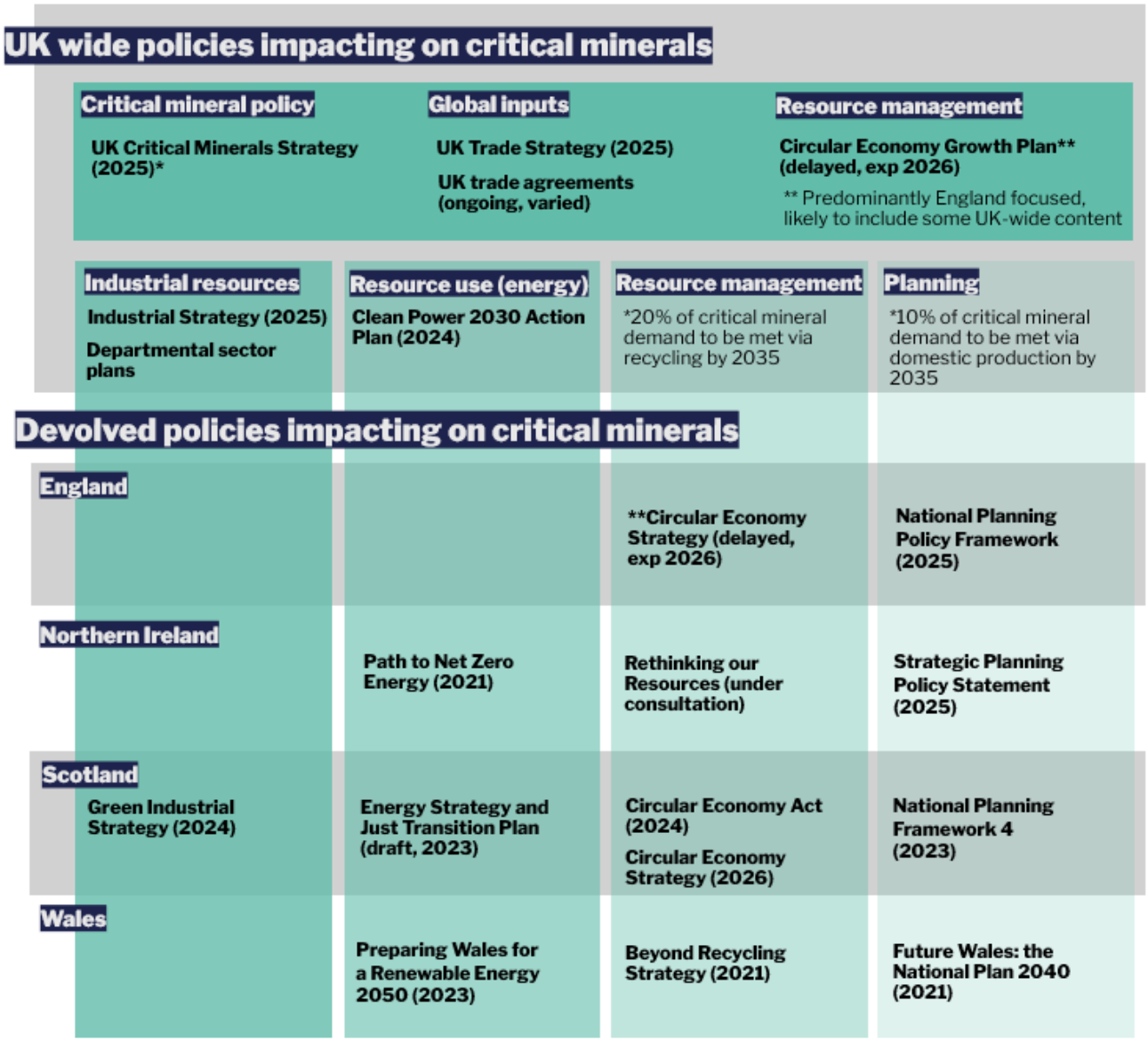
This paper compares the UK and devolved plans and policies around critical minerals and the impact this has on social and environmental concerns. The UK's Critical Mineral Strategy is assessed, along with policies around planning, energy, trade, the circular economy, corporate responsibility, industry, and the military. Recommendations are made for all governments on how to take a more coordinated approach to minimise the impacts of critical minerals.

The most important recommendations of this paper are:

- Planning safeguards must be strengthened and clarified so that reserved and devolved responsibilities are sufficient to protect people and nature as critical mineral mining activities increase across the UK.
- There must be a shared process for approving publicly financed critical mineral projects located in devolved nations. This must take a just transition approach to protect workers and communities, reflecting the greater emphasis on just transition in devolved nation policy agendas.
- The need to create processes to ensure devolved priorities, especially around the energy transition, are included in the negotiation of critical minerals agreements with international partners.
- Quantify critical mineral demand in all national energy strategies. The lack of consideration of critical minerals in any of the UK or devolved energy plans is a serious and major risk to their success. Human rights and environmental due diligence must be prioritised safeguard people and nature from harm.
- Work together to urgently minimise the non-essential use of critical minerals in consumer products across the UK.
- Working with devolved nations, the UK Government must legislate to pass a UK Business, Human Rights and Environment Act, creating a legal requirement for companies operating in the UK to prevent human rights abuses and environmental harm in their supply chains.

- **Differentiate and prioritise** the use of critical minerals for the energy transition over defence purposes.

Without a coordinated approach, our critical mineral plans will continue to be harmful, unfair, and unsustainable. As the UK Critical Mineral strategy begins to be implemented, an opportunity is emerging to work together to create a better future for all.



1. Introduction

This paper, written by a group of civil society organisations working across the UK and internationally, considers how a four-nation approach to critical mineral policy is required to ensure social and environmental impacts are minimised.

The UK Government's Critical Mineral Strategy[1] states that "*Critical minerals are essential to the UK's economy, national security, and clean energy transition*." National plans on energy, transport and communications cannot be achieved without them.

The policy areas linked to critical minerals span reserved and devolved powers. The UK approach to critical minerals has been strongly driven by Westminster, overlooking the different priorities of Northern Ireland, Scotland, and Wales. As explored in this paper, this has led to inadequate and ineffective policy development.

There is overwhelming evidence that the social and environmental impacts of critical minerals are extensive and serious. This means, when the UK Government fails to account for devolved concerns around critical minerals, people and nature are most at risk of being harmed.

Minimising the impact of critical minerals use is essential, urgent and the responsibility of all governments. This will require an approach which includes demand reduction, enforcing high social and environmental standards in all critical mineral supply chains and circular economy measures. To achieve this, careful policy planning and co-ordination across UK and devolved governments is required.

The expected implementation of the UK Critical Mineral strategy and other related policy areas offers an opportunity that will fall to a mix of UK and devolved government action, across a range of departments. Proper management of critical mineral supply chains is an opportunity for the four nations of the UK to create decent jobs, minimise harm to UK citizens, and better protect workers and communities across supply chains.

[1] UK Critical Minerals Strategy UK Government (2026)

2. International context

Critical minerals have rapidly come to dominate international relations. Their uncertain supply and production must now be considered carefully by every government across the world.

China dominates global critical mineral supply chains, with the International Energy Agency estimating that for 19 out of 20 important strategic minerals, China is the leading refiner, with an average market share of 70%.[2]

The US position on critical minerals is dominated by security. A 2025 executive order summarised the views of the Trump administration, stating that: "*Critical minerals, including rare earth elements, in the form of processed minerals are essential raw materials and critical production inputs required for economic and national security.*"[3]

The EU has developed a Critical Raw Material Act which includes development and investment in strategic projects to improve its supply of minerals from with the EU. These projects are being fast-tracked and allowed to develop without the usual environmental safeguards, leading to criticisms that this approach creates unacceptably high risks to people and nature.[4]

Forecasts, which depend on a range of assumptions, suggest that global mineral demand could quadruple by 2040, with clean energy needs accounting for the dominant share of some minerals - up to 92% for lithium and over 50% for copper and nickel.[5] A 30% supply shortfall is expected for copper by 2035, due to demands for electrification.

However, there are many ways to meet the needs of the energy transition and less mineral intensive pathways are possible. A 2024 analysis from the National Engineering Policy Centre recommended that the UK should set a target to half its material footprint and found that the UK could significantly reduce its demand for critical minerals through sector and asset specific plans.[6]

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[2] With new export controls on critical minerals, supply concentration risks become reality International Energy Agency (2025)
[3] The US and EU Approaches to Critical Minerals Explained HSF Kramer (2026)
[4] The risks of fast-tracking mining projects under the CRMA Friends of the Earth Europe (2024)
[5] Global Critical Minerals Outlook 2024 International Energy Agency (2024)
[6] policymaker-summary-critical-materials.pdf National Engineering Policy Centre (2024)

3. Human rights and environmental harm

The social and environmental impacts of critical mineral supply chains are extensive and serious, including corporate manslaughter, human trafficking, child labour, destruction of habitats and widespread pollution.[7] Impacts are increasing. In 2023, the Environmental Justice Atlas recorded 705 cases of human rights or environmental harm related to mining. In 2026, this increased by 22% to 862 such cases.[8]

There are many examples that demonstrate the importance of considering the social and environmental impacts of critical minerals. UK based or listed companies have been involved in nearly a fifth of all human rights complaints listed on the Business and Human Rights Centre's Transition Minerals Tracker.[9] Lithium supplied to the UK can be traced back to the main global producers of this mineral, based in Australia and Chile where there is evidence of corruption, worker exploitation and mines depleting water sources for Indigenous communities and wildlife.[10]

Iron ore is vital to many economic activities, including a just transition to renewable energy. It is listed as a high priority on the UK's critical assessment list. Iron ore mining and steel production involve some of the worse cases of human rights abuses and environmental damage. Last year, the global mining company BHP Group was found liable for the deadly 2015 collapse of a Brazilian iron ore dam.[11]

Excessive resource consumption in the global north is costing the lives of people in the global south and is a significant contributor to the environmental destruction pushing the world beyond safe planetary boundaries. Systemic changes to the way critical minerals are extracted and processed, that focus on human and planetary needs, are urgently required.

The UK's critical mineral strategy anticipates huge increases in the UK's mineral demands, such as an eleven times increase in lithium demand by 2035. Such plans go far beyond

[7] Green-mining-myth-report.pdf FOE Europe (2021)
[8] Environmental Justice Atlas Accessed 24 Mach 2024.
[9] Critical-minerals-critical-choices Trade Justice Movement (2025)
[10] Unearthing Injustice: A global approach to transition materials Friends of the Earth Scotland (2023)
[11] Mining firm BHP found liable in UK for disastrous Brazilian dam collapse The Guardian (2025)

the UK's fair share of this material[12]. Mining affected communities in Chile, Peru, Indonesia, South Africa, and the North of Ireland have condemned this approach.[13]

Ensuring that critical mineral policy meaningfully accounts for devolved as well as UK level policy requirements will improve the way that these materials are used and is necessary for developing a fair and sustainable system of use of critical minerals.

[12] Critical point securing the raw materials needed for the Uks green transition Green Alliance (2021)

[13] Mining affected communities speak out against the UK Government's new Critical Minerals Strategy London Mining Network (2025)

4. UK and devolved priorities

4.1 Planning policies and current mining activity across the UK

All four nations have published national planning documents that include policies on mineral extraction activities. These are:

- In England, the National Planning Policy Framework (2025)[14]
- In Northern Ireland, the Strategic Planning Policy Statement (2025)[15]
- In Scotland, the National Planning Framework 4 (2023) [16]
- In Wales, Future Wales: the National Plan 2040 (2021)[17]

The mineral policies in all four documents are similar, emphasising the economic potential of mineral resources, with some guidance on preventing adverse social and environmental impacts. **However, the guidance on these impacts is too weak and insufficiently detailed to protect people and nature from the risks of mineral mining extraction in the UK.** There are no safeguards for workers or communities, no commitments to transparency or specific requirements on businesses to mitigate their impacts on communities or nature.

The documentation of destructive impacts of mining activities across the UK and the local opposition to such projects is evidence of the ineffectiveness of these planning documents to protect people and nature. For example, the 'Save our Sperrins' campaign has documented a long-term and broad opposition to the plans of Dalradian Gold, a Canadian goldmining company seeking to expand mining operations in Northern Ireland.[18]

Policy makers and regulators must establish and enforce high standards of practice for mining operations across all four UK nations. This includes:

- **Setting environmental standards** specifically designed to address the social and environmental risks of mining, such as water pollution.
- **Improving community engagement**. People must be consulted with early, using a transparent engagement process, including clear and unbiased information on the planned activities. The findings of consultations must be acted on, with priority given to resolving social and environmental concerns of local people before projects can proceed.

[14] National Planning Policy Framework UK Government (2025)
[15] The Strategic Planning Policy Statement the Northern Ireland Executive (2025)
[16] National Planning Framework 4 Scottish Government (2023)
[17] Future Wales: The National Plan 2040 Welsh Government (2021)
[18] Inquiry into Dalradian gold mine plans restarts in Omagh Impartial Reporter (2026)

- **Real-time and transparent monitoring** of the impacts of mining company activities.
- Ensuring end of project accountability.

Many of the sector plans covered within national planning frameworks, such as transport, and emerging areas of demand, such as data centres (whose capacity grew by a factor of 25 between 2010–2018), will require bespoke standards to minimise critical mineral demand.

Recommendations on planning policies

All Governments must:

- Immediately strengthen social and environmental safeguards for all critical mineral mining plans happening or planned in the UK, with special consideration of how the views of communities in devolved nations will be appropriately considered.
- All infrastructure plans requiring significant amounts of critical minerals must include:
    - Consultations that are transparent and begin early in the planning process.
    - Commitments, developed from consultation findings, which address community and environmental concerns.
    - Regular and transparent monitoring and reporting of critical mineral use throughout the project lifetime.
    - Decommissioning and reuse policies which consider how critical minerals can be most fairly and sustainably managed.

4.2 Critical Mineral Strategies

The UK's Critical Minerals Strategy, 'Vision 2035', sets out a 'whole-UK' approach to critical minerals policy, saying: "*While this is a UK government Critical Minerals Strategy, we work together with devolved administrations to ensure that the strategy is tailored to the needs of industry and leverages strengths across the whole of the UK.*" Northern Ireland, Scotland, and Wales do not have separate critical mineral strategies.

One of the stated priorities of the UK Critical Mineral Strategy is for at least 10% of annual UK demand for critical minerals to be met through domestic production (primary extraction, processing, and refining of critical minerals) by 2035. It also includes a commitment to provide funding support of up to £50 million for critical mineral projects.

However, mining regulations are only partly reserved, with UK Government retaining powers around strategic national policy and devolved governments given roles in planning, permitting, and community engagement.

The UK Critical Mineral Intelligence Centre has assessed the geological potential for critical minerals across the UK. Four of the six sites of most interest were in Northern Ireland, Scotland, and Wales[19]. The social and environmental impacts of mining activities were not considered in this report. One of these sites is near Loch Maree in the Highlands, a Site of Special Scientific Interest, and a National Nature Reserve.

Mining activity is unevenly distributed in the UK, with a higher proportion of land in devolved nations covered by mining concessions[20].

Table 2. Proportion of land covered by mining concessions

Nation	Proportion of land covered in mining concessions
Northern Ireland	25%
Scotland	7.7%
Wales	6.4%
England	0.2%

This approach risks being highly unjust. The UK Government can set an agenda which is likely to increase extraction in Northern Ireland, Scotland and Wales compared to England. The burdens of extraction will fall on devolved nations, and they are less able to protect their citizens, communities, and natural resources because of their restricted powers and the poorly understood cut off between reserved and devolved powers.

An additional barrier is that it is unclear whether communities in devolved nations close to critical mineral mining activities should speak to UK or devolved representatives about their concerns. In 2025, a study by Edinburgh University and Friends of the Earth Scotland which interviewed people affected by local mining exploration plans found that Westminster and Holyrood based politicians appeared to shift blame to each other rather than address the concerns of their constituents[21].

The people interviewed for this study felt that the mining plans would not benefit them and that it would only exacerbate existing injustices around land ownership, environmental damage, and job opportunities.

[19] Potential for Critical Raw Material Prospectivity in the UK Critical Mineral Intelligence Centre (2024)

[20] Fears island of Ireland faces 'new carve-up' by mining companies, The Guardian (2025)

[21] Communities and transition mineral mining in Scotland Friends of the Earth Scotland (2025)

The obvious lack of a just transition approach in these cases is inconsistent with the strategic focus on just transition encouraged by the Scottish Government. More meaningful input from devolved governments into the UK-level critical mineral strategic decisions would encourage more focus on a just transition, which would benefit not only those people in devolved nations but communities across the UK.

Recommendations on critical mineral strategies

The UK Government must:

- Work with devolved nations on the implementation of the UK Critical Mineral Strategy more directly so that it aligns with devolved priorities. This should include a shared process for approving and announcing critical mineral projects developed in devolved nations, especially when these include funds from UK public finances.
- Agree and clarify the reserved and devolved powers around critical mineral strategy, planning, and community engagement.
- Require that any public money spent on critical mineral projects in the UK meets the best practice approaches for just transition (protecting both workers and communities) and environmental standards of all four nations.

Devolved Governments must:

- Work with the UK Government on the implementation of the UK Critical Mineral Strategy, ensuring that devolved nation social and environmental concerns are accounted for and the strategy aligns with devolved priorities.
- Ensure that devolved political representatives understand their responsibilities to their constituents affected by mining plans and activities.

4.2 Trade agreements

The UK Critical Minerals Strategy envisages a major role for trade agreements in supporting the UK's demand for critical minerals: "*For future Free Trade Agreements the UK will seek to pursue higher ambition outcomes regarding critical minerals, for example with the inclusion of specific chapters on critical minerals collaboration or supply chains. We will also seek to make use of bilateral critical mineral agreements with international partners…*"

To date, critical minerals agreements signed by the UK have largely take the form of non-binding Memorandums of Understandings (MoUs). In the past year, the UK has signed critical mineral MoUs with countries including the USA, Kazakhstan, and Saudi Arabia.

These MoUs outline areas for collaboration but do not oblige either party to act on issues including social and environmental protections. They also fail to mention devolved nations. There is little transparency or public discussion about their content, indeed, in many cases agreement text has not been published at all.

The UK Government intends to make greater and more proactive use of critical minerals agreements. There is a risk that these agreements can limit the policy space of mineral-rich countries to benefit sustainably from their natural resources. Given the central role of these agreements in the strategy, greater involvement from devolved Governments is required so that devolved nation priorities can be embedded into the agreements. This should be part of wider considerations about how transparency and accountability of critical mineral MoUs can be improved.

Northern Ireland[22] Scotland[23] and Wales[24] all have international strategies but none of them mention critical minerals.

Recommendations on critical mineral trade agreements

The UK Government must:

- Improve transparency of critical mineral trade agreements development, including MoUs, and engagement with devolved nation governments, beginning engagement as early as possible and continuing this throughout the process.
- Work with devolved Governments to align developing trade agreements with their priorities, especially around the energy transition.
- Strengthen social and environmental safeguards of critical mineral trade agreements, by ensuring compliance with human rights and environmental standards and obliging UK corporate actors to respect these.

Devolved Governments must:

[22] Executive's International Relations Strategy February 2014 Northern Ireland Executive (2014)
[23] Scotland's International Strategy Scottish Government (2024)
[24] International Strategy Welsh Government (2020)

- Work more closely with the UK Government on the implementation of the UK critical mineral trade agreements, ensuring that devolved nation social and environmental concerns are accounted for.

4.3 Energy plans

None of the UK or Devolved Government plans on energy consider critical minerals. Implementing these plans will require increases in critical mineral demand. If these minerals cannot be obtained, the energy plans cannot happen.

There is a necessary trade-off between the rapid system electrification required to reduce fossil fuel reliance and meet net zero goals and critical mineral demand. Electrification is expected to reduce primary energy demand and ultimately reduce the materials in the system if they are managed correctly, but in the short-term there will be an increase in critical mineral demand.

The UK Clean Power 2030 Action Plan set out the UK Government's proposals for delivering an energy transition across the UK. It acknowledges the significant devolution of powers in energy. While the action plan considers coordinated action to increase renewables capacity, electricity generation and battery storage, and highlights the need to develop more sustainable supply chains, it does not mention critical minerals nor the relevant domestic or international supply chain considerations that might be associated with increased demand related to 2030 plan delivery.

Scotland's draft Energy Strategy and Just Transition Plan[25] was published in 2023. The final version of this plan has been delayed and is not yet published. The draft plan includes a commitment to 20 GW of additional renewables by 2030 and near total decarbonisation of the transport, heat, and industrial sectors. It does not consider how the critical minerals required to meet the strategy will be obtained.

Welsh[26] and Northern Irish[27] energy plans do not consider critical mineral requirements.

The UK and Scottish Government acknowledge that Scotland must have a major role in meeting the UK's energy and net zero targets, and Scotland's energy and climate change plans have been partly shaped by its relative abundance of renewable energy generation potential compared to the rest of the UK.

[25] Draft Energy Strategy and Just Transition Plan Scottish Government (2023)
[26] Preparing Wales for a Renewable Energy 2050 Welsh Government (2023)
[27] Energy Strategy 'Path to Net Zero Energy' Northern Ireland Executive (2021)

The lack of consideration of critical minerals in any of the UK energy plans is a serious and major risk to the success of these plans. International conflicts, material shortages, trade restrictions, and climate breakdown mean that supply chains, including those for critical minerals, are becoming increasingly vulnerable to disruption. Ignoring these challenges creates a risk to the delivery of national renewable energy plans, if the materials required to build new infrastructures and products cannot be sourced at all or can only be sourced in ways that cause human rights violations and environmental damage.[28]

If supply chain security is to improve, sourcing of critical minerals must not come at the expense of human rights or the environment. The world cannot afford to replace one energy crisis with another. This is true for the people and nature of all four UK nations. It is even more true for countries in the Global South where gaps in regulation or enforcement heighten the risk of abuse and corporate impunity.

Those UK Government and devolved energy policies which require significant amounts of critical minerals should consider how this demand can be minimised, firstly through demand reduction measures and secondly through circular economy measures.

Recommendations on energy plans

The UK and devolved Governments must:

- **Incorporate critical mineral demands and risks into national energy plans.** This should be based on demand reduction and circular economy measures and, at the same time, prioritise critical mineral use for the energy transition.
- Work together to create standards on the human rights and environmental due diligence of critical mineral supply chains required for the energy transition.

The Scottish Government must:

- Publish a revised Energy Strategy and Just Transition Plan by 2027. The plan should prioritise how to minimise critical mineral requirements and protect human rights and limit environmental damage in critical mineral supply chains.

[28] Rethinking resources Friends of the Earth Philippines and Friends of the Earth Scotland (2025)

4.4 Circular economy strategies

Circular economy and waste are largely devolved issues and governments in Scotland and Wales have gone further than other UK nations in their circular economy plans.

In 2024, the Scottish Parliament unanimously passed the Circular Economy Act[29] which includes several commitments relevant to critical minerals:

- A circular economy strategy must be written which has regard to the requirement that "*due diligence in relation to environmental protection and human rights is exercised in supply chains*" and addresses "*the potential international impacts of* [the Scottish Government's] *circular economy policies*".
- The strategy and national circular economy targets must have regard to "*the whole life cycle carbon emissions of materials and products*".
- The strategy must have regard to the just transition principles laid out in the Climate Change (Scotland) Act 2009.[30]

The Circular Economy Strategy for Scotland[31] was published in 2026, and targets will be published before 2027. It considers, for the first time, critical minerals, including:

- A commitment *"to maximise the role of circularity of critical raw materials in Scotland."*
- Research commissioned on Scotland's exposure to supply chain risks for renewable and net zero technologies.
- Plans to engage with the UK Government on their £50m fund for developing critical mineral projects across the UK.
- A commitment to reduce the "*negative human and environmental impacts experienced internationally from production, consumption and disposal.*"
- As a priority, uphold the UN Guiding Principles on Business and Human Rights,
- restating the need for public bodies and those companies awarded public contracts to protect human rights.
- An intention to engage with the UK Government on due diligence measures.
- An overall vision of achieving "*sustainable levels of material use by 2045*".

The Strategy was criticised by environmental groups and members of the public for "*failing to hold big businesses accountable for their harmful practices.*"[32] This must be addressed if the Strategy is to be successful in its aims.

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[29] Circular Economy (Scotland) Act 2024

[30] Climate Change (Scotland) Act 2009

[31] A Circular Economy Strategy for Scotland Scottish Government (2026)

[32] Waste plan is 'wasted opportunity' for Scotland Friends of the Earth Scotland (2026)

Box 1: Consultation with global south representatives

During the Scottish Circular Economy Strategy consultation process, the Scottish Government, supported by Scottish NGOs, held a series of meetings with representatives from the global south to understand their views on policies which were likely to affect global south countries. The impacts of critical mineral supply chains were discussed, including examples from Asia, Africa and South America.

In the meetings and supporting report[33], it was argued that if only the Scottish context is considered, without understanding the consequences for global south countries, policies may be developed which result in negative consequences for the global south, and this could lead to worse outcomes for everyone on a global scale. For example, policy outcomes which worsen climate breakdown affect everyone, wherever they live.

The global south consultation resulted in several important improvements to the Scottish Circular Economy Plans (see main report).

This pioneering approach (with the global south's participants time and translation services funded by the Scottish Government) shows a commitment to meaningful consultation with Global South participants. A similar approach is needed for critical minerals, which should involve both devolved and UK Government representatives.

The Welsh 'Beyond recycling' strategy[34], published in 2021, considers critical raw materials under the aim of driving innovation in materials use. The strategy includes a headline aim to "procure on a basis which prioritises good and products which are made from remanufactured, refurbished and recycled materials or come from low carbon and sustainable materials." However, there are no specific actions identified within the strategy regarding critical mineral extraction or use either domestically or overseas.

The Circular Economy Strategy for England is under development and its publication delayed. In setting out his circular economy vision in March 2025, former UK Secretary of State Steve Reed referenced the need to "*prevent us running out of critical resources*" and decrease reliance on import of raw materials including "*materials and components essential to our phones, computers, electric vehicles, hospital equipment and clean energy infrastructure*" as key drivers of the strategy[35].

[33] Successful consultation with the global south Friends of the Earth Scotland, SCIAF and Common Weal (2025)

[34] Beyond-recycling-strategy Welsh Government (2021)

[35] Environment Secretary Steve Reed - Circular Economy speech UK Government (2025)

This suggests that the final Circular Economy strategy for England may engage with these cross-cutting concerns, although critical minerals will not form one of the core thematic chapters of the strategic approach. However, the exact content of the England strategy, originally expected in autumn 2025, remains unclear, as it is still unpublished.

The Circular Economy Strategy for England should include circular economy plans around critical minerals, prioritising the minimisation of social and environmental harms in domestic and international supply chains.

Northern Ireland's "Rethinking our resources" plan[36] is open for consultation until May 2026. It does not mention critical minerals, although the Waste Framework Directive requirement to reduce waste generation in processes including mineral extraction is noted.

In all nations, measures to minimise the use of critical minerals in consumer products should be part of circular economy strategies, including:

- Mandatory limits on vehicle battery sizes. A 30% reduction in the largest EVs sold in the UK could save 46,000 tonnes of lithium.
- Expanding existing eco-design regulations to encourage durability, upgradability, and disassembly.
- Codify a right to repair across the UK and increase investment in third sector reuse and repair organisations specialising in electronic products.
- A modal shift from private transport systems to improved public transport services. Each bus only needs to displace 5.5 cars for there to be savings in lithium demands.[37]
- Remove regulatory barriers to lithium battery reuse and recycling.
- Work with Electronics Watch[38] to monitor and improve public sector supply chains and human rights impacts and invest in reuse and repair services so that everyone can access these services easily.
- Expand the ban on disposable vapes to restrict reusable vapes as much as possible.

Recommendations on circular economy policies

For all UK nations:

- Include critical minerals in circular economy plans, prioritising the minimisation of social and environmental harms in domestic and international supply chains.

[36] Rethinking Our Resources draft plan Northern Ireland Executive (2026)

[37] Achieving Zero Emissions with More Mobility and Less Mining - Climate and Community Institute (2023)

[38] Electronics Watch

- Full and fair consultations are needed at every stage of policy development, including with citizens, human rights and environmental groups and workers.
- International groups must also be consulted, following the approach taken in Scotland[39] by consulting directly with experts in critical minerals and circular economy measures from the global south.
- Minimise the non-essential use of critical minerals in consumer products and increase investment in, and remove barriers to, reuse.
- Work with Electronics Watch[40] to monitor and improve public sector supply chains and human rights impacts.

For the Scottish Government:

- Ensure all circular economy plans have regard to international impacts and due diligence in supply chains, as required in the Circular Economy (Scotland) Act. This must include critical mineral supply chain impacts, as a significant source of harm.
- The research commissioned to understand critical mineral requirements must consider how demand can be minimised (through reduction and circular economy measures).

For the UK Government:

- Include critical minerals in England's upcoming circular economy plan, including a commitment to minimise demand and promote circular economy measures. Align these plans with human rights and environmental due diligence standards developed as part of the UK Critical Mineral Strategy implementation plans.

4.5 Corporate responsibility

A UK-wide law on mandating corporate responsibility and due diligence of supply chains is required to significantly improve the human rights and environmental damage caused by critical mineral supply chains.[41] Such a law should plug the serious legal gaps that enable companies to profit from the UK's weak regulatory regime and create a level playing field to ensure that responsible businesses, that do take steps to prevent human rights and environmental harms, are not at a competitive disadvantage. There is widespread business, political, and public demand for a new law. In Germany, the recent

[39] Successful consultation with the global south Friends of the Earth Scotland, SCIAF, Common Weal (2025)

[40] Electronics Watch, accessed March 2026

[41] A Business, Human Rights and Environment Act: The Clear Case for a New Law Corporate Justice Coalition (2025)

implementation of due diligence legislation has already resulted in a range of fairer wages, protection from toxic pesticides and reductions in land grabbing, forced labour and displacement.[42]

The elevated risk of human rights abuses and environment destruction caused by critical mineral extraction means that any new corporate responsibility law must ensure the specific harms of critical mineral supply chains are covered. The legislation must allow for the UN Guiding Principles on Business and Human Rights[43] to be upheld, as referenced in the Scottish Government's Circular Economy Strategy, as well as the UN Declaration on the Rights of Indigenous Peoples.

The law must be UK-wide to be effective. Devolved governments must be allowed significant opportunity to ensure the drafting of the law matches their requirements and commitments.

Recommendations on corporate responsibility

For the UK Government:

- Legislate to pass a Business, Human Rights and Environment Act, creating a legal requirement for UK companies to prevent human rights abuses and environmental harm in their operations, subsidiaries, and supply chains. The law must ensure the specific harms of critical mineral supply chains are covered.
- Include devolved governments appropriately in the development of such a law.

For devolved nations:

- Input appropriately into the development of a UK Business, Human Rights and Environment Act to ensure devolved considerations around social and environmental impacts are accounted for properly.

4.6 Industrial strategies

Published in 2025, the UK's Industrial strategy[44] specifically defines critical minerals as a foundational industry for UK growth, and mentions "critical minerals clusters" in Aberdeen, Belfast and South Wales as well as across England. It mentions:

- The drive to 'renew' partnerships in "*Scotland, Wales and Northern Ireland, including through close collaboration with devolved governments*."

[42] The Impact of Due Diligence Legislation, German Watch (2026)
[43] Guiding Principles on Business and Human Rights, UN (2011)
[44] The UK's Modern Industrial Strategy UK Government (2025)

- The need to strengthen 'domestic foundations' in the interests of economic and national security, including potential domestic capability building or international partnership around inputs including critical minerals.
- UK Export Finance support for domestic suppliers wishing to export critical minerals products via UK exporters.

Eight sector plans were released by other UK departments in 2025 to outline how their work will link to the UK Industrial Strategy. Some of these reference activities related to critical minerals – for example:

- The Clean Energy Industries Sector Plan[45] specifically highlights activity to "*support innovation and R&D to reduce our reliance on overseas critical minerals. The UK's strengths in innovation and R&D provide opportunities for global leadership and economic growth. For example, sustainable lithium mining and refining in Cornwall and the Northeast England, nickel refining in Wales; rare earth magnet recycling in Birmingham and Belfast; and the development of modern technologies, such as diamond battery powered (lithium-free) batteries in Oxfordshire.*"
- The Digital Technologies Sector Plan[46] briefly mentions that "*key minerals like gallium, germanium, silicon, and copper are crucial for semiconductors*" - but also suggests the UK should capitalise on its strengths in semiconductors, including by scaling up "*the domestic supply chain of semiconductors in the North-East of England.*" Semiconductor clusters also exist in both Scotland and Wales.

Scotland's Green Industrial Strategy[47], published in 2024 was severely criticised by the Just Transition Partnership, a coalition of trade unions and environmental organisations, for its lack of consultation and emphasis on market-based financial investment and lack of just transition approach.[48] It does not mention critical minerals.

Wales does not have a separate industrial strategy but worked "openly and transparently" with the UK Government on the development of the UK version.[49]

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[45] The UK's Modern INDUSTRIAL STRATEGY - Clean Energy Industries - Sector Plan UK Government (2025)

[46] The UK's Modern Industrial Strategy - DIGITAL AND TECHNOLOGIES - Sector Plan UK Government (2025)

[47] Green industrial strategy, Scottish Government (2024)

[48] Hoping for progress in 2025, after disappointment in 2024, Just Transition Partnership (2025)

[49] Written Statement: UK Government Industrial Strategy Welsh Government (2025)

Box 2: Steel policy misalignment in Scotland

Steel is a strategically vital material for any modern economy. Eight million tonnes of steel consumed in the UK annually. In 2024, mills in England and Wales cover nearly 30% of UK demand.[50] However, since 2024, there have been major shutdowns reducing UK production significantly.

A Scottish Government funded analysis found that a new, modern steel mill situated on the Northeast coast of Scotland could become the heart of a new industrial hub for offshore wind assembly, using locally decommissioned oil and gas rigs and wind turbines.[51] There is limited capacity for decommissioning wind turbines in terms of ports, equipped yards, and specialist engineers across the UK. A 300,000 tonne steel plant could create over 650 jobs.

Public and private investment within the Cromarty Firth Green Freeport area has already begun. However, the scale of the development has alarmed the local community and environmental groups.[52] In addition, the cost of electricity, which is largely controlled by the UK Government, is a significant barrier to success.

Realising this opportunity requires coordination between the UK and Scottish Government, as well as meaningful consultation with local communities, workers, and environmental groups if it is to become an example of fair and sustainable domestic material supply. This example shows how one critical mineral, steel, requires specific consideration and integration into the UK and Devolved Government strategies for critical minerals, energy, and circular economy.

Recommendations on industrial strategy

For the UK Government:

- Work with devolved nations to identify, assess, and reduce demand for critical mineral needs of industrial developments in devolved nations.
- Work with the Scottish Government to remove reserved barriers to an offshore wind assembly hub and electric arc furnace in Scotland.

For devolved nations:

[50] UK Steel Key Statistics 2025 UK Steel (2025)

[51] Circular Steel in Scotland, Zero Waste Scotland (2023)

[52] Nairn community councils share concerns over Ardersier Port expansion plans, The Inverness Courier (2026)

- Work with the UK Government to identify, assess, and reduce demand for the critical mineral needs of industrial developments in devolved nations.

For the Scottish Government:

- Update the Green Industrial Strategy to include critical minerals and take a just transition approach.
- Revive the steel sector roundtable, whose membership should include representatives of workers, communities and the environment, and task it with developing a just and circular steel strategy for Scotland in 2026.
- Work with the Scottish Government to remove barriers to offshore wind manufacturing in Scotland, including an electric arc furnace.

4.7 Military plans

There is a recent and rapid shift towards militarisation increasingly being prioritised over energy and driving critical mineral demand. UK and Devolved Governments must strongly oppose this to ensure the best possible chance of creating a fair and sustainable future.

Of the 33 minerals listed by the UK as critical, 6 play no role in energy transition pathways and a further 15 are only likely to need a small proportion of current global production.[53] Of those critical minerals which do not play a significant role in the energy transition, five are top priorities for the aerospace and defence sector. For most minerals, small diversions of minerals from other uses would facilitate the green transition without the need to increase production.

The UK Critical Mineral Strategy should assess, differentiate, and prioritise those supply chains for critical minerals which actively contribute to the UK's energy, transport, and digital plans. This should include a quantitative assessment of devolved plans in these areas, as well as ways to reduce demand, limit extraction and improve circular economy processes.

Defence Industrial Strategy

In 2025, the UK Ministry of Defence published a defence sector specific industrial strategy, and a concept note on sustainable circular economics for defence[54]. Both documents reference critical minerals and considerations around the sourcing and supply chains for such materials. The strategy also references the need to build resilience in critical raw

[53] Material-Realities-Minerals-Report-2025 Global Justice Now (2025)

[54] Sustainable circular economics for Defence concept note UK Ministry of Defence (2025)

materials for defence purposes, and sets out actions the ministry plans to undertake in the circular economy space in order to support this:

"Working with industry to develop our ability to apply circular economy's principles on Defence Critical Raw Materials, we will: unlock new domestic and export opportunities of high-value materials; develop cutting-edge technologies in robotics, automation, and less polluting processing (including chemicals); generate employment in both high-skilled R&D roles and broader industrial operations; and increase reshoring, nearshoring and friendshoring opportunities for critical materials' processing."

There is a significant and active trend amongst rich countries, led by the USA and including the UK, to stockpile critical minerals and funnelling them into military projects, rather than energy ones. Such a strategy is self-defeating, economically disruptive, and environmentally counterproductive. It can create artificial scarcity, fuelling price rises. Accumulating resources that might not be used, as technological needs change, is inefficient and expensive. A UK-wide policy opposing stockpiling is an obvious early step towards more efficient and sustainable use of critical minerals.

Recommendations on military plans

To the UK Government:

- Assess, differentiate, and prioritise the use of critical minerals for the energy transition over defence purposes and other sources of unsustainable material consumption.
- Oppose the stock piling of critical minerals for defence manufacturing purposes.

To devolved Governments:

- Engage with the UK Government to ensure any potential conflicts for critical minerals demands prioritise devolved energy plans over UK defence plans.

5. Conclusions

Many UK and devolved policies are linked to critical mineral use. Often the overlap between UK and devolved responsibilities around critical minerals is poorly understood. This has led to policies including trade, energy and industrial strategies which fail to account for devolved views. This mismanagement of strategies means devolved nations are being overlooked and unfairly impacted by a UK set agenda.

Critical mineral supply chains are connected to serious and extensive human rights and environmental harms. Mismanagement of critical mineral policies across the UK nations is having damaging effects both within the UK and internationally.

There must be an ongoing commitment from policy makers working at all levels of government to engage together on plans concerned with critical minerals. Such plans must be based, first and foremost, on a commitment to human rights and environmental due diligence. The UK Government must make space for devolved nations to be included in policy making around critical minerals which affect devolved nations. Devolved nations can encourage this by engaging through their direct channels to UK Government and making their priorities clear. Only together, can fair and sustainable management of critical minerals be achieved.


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