



The German Raw Material Strategy:

Taking Stock

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Edited by the Heinrich Böll Foundation 2012

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At the time of writing, it has been a year and a half since the publication of "The German Government's raw materials strategy". In response to demands from German industry prompted by the fear of growing problems in securing supplies of raw materials and calling for a more active support policy, the German government published its raw materials strategy on 25 October 2010. Earlier, in 2008, a Communication of the European Commission on raw materials had already been published, again heeding calls by Germany's industry associations.

The present paper is an attempt to take stock of how individual core elements of the raw materials strategy have been put into practice, with a focus on the promotion of foreign trade and on development cooperation:¹

The European raw materials strategy – the frame of reference

The European strategy is founded on three pillars, which were laid out in European Commission Communications published in 2008 and 2011.² The first pillar addresses problems in the supply and availability of metal raw materials. These are to be tackled primarily by means of trade and investment policy measures, in support of which the European Union (EU) is instituting its own "resources diplomacy". Its objectives are to assure access to raw materials in Africa, urge resource-rich developing countries to lift market-distorting barriers, and identify common interests with other resource-dependent countries like the USA and Japan so that joint activities can be developed. The second pillar is concerned with opportunities to exploit or develop European mineral deposits in order to reduce dependency on imports of certain raw materials.³ The third element of the EU strategy comprises the areas of resource efficiency, recycling and reuse, subjects also addressed by the Communication of the EU Commission containing a "Proposal for a European Innovation Partnership on Raw Materials" published at the end of February 2012,⁴ which states the goal of significantly reducing Europe's dependency on imported raw materials by 2020 and lists a number of means to this end, including:

- extraction of raw materials in the EU and, as a prerequisite, establishment of a European geological information system;
- · waste avoidance, urban mining, and
- prevention of the illegal export of scrap metal.

Achievement of this goal will be facilitated by a network of European research institutes, businesses, policy bodies and Member State institutions.

¹ Questions of resource efficiency and sufficiency are not pursued any further within the scope of this paper. See also the resource efficiency programme entitled "ProgRess", which was passed by the German Cabinet on 29 February 2012.

² The raw materials initiative – meeting our critical needs for growth and jobs in Europe (COM (2008) 699 final) Tackling the challenges in commodity markets and on raw materials (COM (2011) 25 final)

³ See also: Improving Framework Conditions for Extracting Minerals for the EU, 2010

⁴ Communication of the European Commission, Making raw materials available for Europe's future well-being, Proposal for a European Innovation Partnership on Raw Materials, Brussels, 29 February 2012, COM(2012) 82 final

The centrepiece of the European strategy, however, is the removal of barriers to trade. For instance, back in 2009 the EU joined forces with the USA and Mexico to bring a claim against China at the World Trade Organization (WTO). China had applied export duties and quotas to a number of raw materials and refinery products (bauxite, fluorite, manganese, magnesium, yellow phosphorus, silicon metal, silicon carbide and zinc). The WTO ruled that the export restriction on resources was incompatible with WTO rules. China lodged an objection to this decision, which the WTO rejected in the last instance on 30 January 2012⁵ – not because the WTO expressly prohibits export duties, but because on becoming a member, China had explicitly undertaken to reduce export duties and to refrain from invoking WTO waivers for protection of the environment, natural resources and national security.

Following this WTO ruling against China's export restrictions on raw materials, the EU, the USA and Japan went on to lodge a complaint against China's export restrictions on rare earths in March 2012.

Although an updated version of the European strategy produced in 2011 incorporates a stronger focus on coherence between development policy and resource-securing measures, there is little change to the fundamental emphasis on combating trade barriers.

Table 1 Key dates in German and European raw materials policy

	Germany	Europe
March 2005	1st BDI (Federation of German Industries) raw materials congress Agreement with the German federal government to develop a joint raw materials strategy for Germany	
December 2005		EU Commission Communication: Thematic Strategy on the sustainable use of natural resources
March 2007	2nd BDI raw materials congress Presentation of "Elements of a German government raw materials strategy"	
2007	Reform of instruments for promotion of foreign trade	
2008		Publication of the EU Commission Communication "The raw materials initiative – meeting our critical needs for growth and jobs in Europe"
2009		Complaint lodged by the EU, the USA and Mexico against export duties and quotas imposed by China on nine different raw materials

⁵ http://www.euractiv.de/druck-version/artikel/rohstoffstreit-eu-und-usa-erfolgreich-im-wto-streit-mit-china-005925, Stormy-Annika Mildner (2012) Zwei zu null im Rohstoffstreit, SWP

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2010	German government's raw materials strategy passed by the Federal Cabinet 3rd BDI raw materials congress Presentation of the German raw materials strategy Presentation of the specific raw materials strategy of the Federal Ministry for Economic Cooperation and Development (BMZ)	Publication of the report on critical raw materials; defines fourteen critical raw materials for European industry
February 2011		Communication of the EU Commission on the European raw materials strategy "Tackling the challenges in commodity markets and on raw materials", updating the strategy of 2008
July 2011		"Report on an effective raw materials strategy for Europe" passed by the European Parliament (rapporteur: MEP Bütikofer) calling for greater promotion of recycling and reuse, and advocating an international structure for resource governance.
October 2011	Signing of raw materials partnership with Mongolia	
January 2012	Formation of the raw materials alliance "Allianz zur Rohstoffsicherung" by German companies interested in direct involvement in extractive projects	Conference on EU – Africa Partnership on raw materials
February 2012	Signing of raw materials partnership with Kazakhstan. BMU resource efficiency programme (ProgRess) passed by the Cabinet	Communication of the EU Commission: "Making raw materials available for Europe's future wellbeing. Proposal for a European Innovation Partnership on Raw Materials", supporting resource extraction in Europe, the recycling of electroscrap and the substitution of critical minerals and metals

Source: Blume et al. (2011)⁶, own summary

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⁶ Blume, Jutta, Greger, Nika, Pomrehn (2011) Oben hui, unten pfui, Rohstoffe für die "grüne" Wirtschaft, PowerShift, Forum für Umwelt und Entwicklung, Berlin

Core objectives of the German raw materials strategy

Similar aspects can be identified in Germany's raw materials strategy. Like the European strategy it is predominantly motivated by an interest in improving access to raw materials for (German) industry. From this the German government derives the following core strategic objectives:

- removing trade barriers and distortions of competition,
- helping German enterprises to diversify its sources of raw materials,
- helping industry to develop synergies from sustainable economic activities and enhanced materials efficiency,
- developing technologies and instruments to improve the conditions for recycling,
- establishing bilateral resource partnerships with selected countries,
- doing research into substitution and materials in order to open up new options,
- focusing resource-related research programmes,
- · creating transparency and good governance in resource extraction,
- integrating national measures with European policy on raw materials.

Measures to promote commerce and foreign trade are of foremost importance. Both the German and the European Union raw materials strategy prioritise free trade in raw materials and the removal of all trade barriers affecting commodities. This is borne out by the first report on the implementation of the raw materials strategy, which was prepared for the German Bundestag Committee on Economics and Technology in May 2011 and deals exclusively with the trade and investment-policy aspects of the strategy.

Institutional setting

Resources policy has been anchored within the German federal government as a cross-sectoral brief that cuts across foreign and security policy, research and technology policy, foreign trade and commerce policy, development, industrial, environmental, agricultural, forestry and European policy. These different policy portfolios cooperate in an Interministerial Committee on Raw Materials coordinated by the Federal Ministry for Economics and Technology (BMWi), along with other official bodies including the German Mineral Resources Agency/Federal Institute for Geosciences and Natural Resources, and the Bundesbank. Representatives of the Federation of German Industries (BDI) and other industry associations play a permanent role as "experts" for the Interministerial Committee, which blurs the boundary between political decision-making and lobbying in the interests of the major industry associations. No broader consultation/discussion with the wider public on the German government's resources policy is envisaged in this institutional setting.

Strengthening the institutional framework and expanding the state provision of advisory support to companies is an essential instrument to support business. In addition to existing information services for the promotion of foreign trade (like German Trade and Investment), two specific institutions were created for the implementation of the resources strategy: the German Mineral Resources Agency

⁷ The following federal ministries comprise the Interministerial Committee beside the BMWi: Foreign Office (AA); Ministry of Finance (BMF); Ministry of Food, Agriculture and Consumer Protection (BMELV); Ministry for the Environment, Nature Conservation and Nuclear Safety (BMU); Ministry of Education and Research (BMBF); Ministry for Economic Cooperation and Development (BMZ); Ministry of Transport, Building and Urban Development (BMVBS); Ministry of the Interior (BMI).

(Deutsche Rohstoffagentur, DERA) and the Institute for Resource Technology. Their establishment was already envisaged in the coalition agreement of the present German federal government.

DERA was established as a central information and advisory platform under the umbrella of the Federal Institute for Geosciences and Natural Resources. Among its various advisory services for German industry, it is developing an early warning system to identify risks in the raw material supply, developing new instruments and methods in the extractive industries, and cooperating with resource-rich partner countries. Risks in this context are defined predominantly as supply risks, based on criteria such as availability, subsidiarity, concentration of extraction countries and mining companies, and political risks.

In the course of development cooperation, DERA carries out projects in cooperation with the Federal Institute for Geosciences and Natural Resources aimed at helping developing countries make sustainable use of their resource potential and at supporting their integration into the international resources sector.

Overall the profile of the new agency is still somewhat undefined. Many of its tasks were previously carried out by the Federal Institute for Geosciences and Natural Resources and are being continued by the re-badged organisation. The same is true of the consulting services offered by DERA to German business.

A more technical brief is fulfilled by the Helmholtz Institute for Resource Technology in Freiberg, which was founded in August 2011 in a partnership between the Helmholtz-Zentrum Dresden-Rossendorf and the Freiberg University of Mining and Technology. Its mission is to "develop innovative technologies for industry in order to supply and utilise mineral and metal resources more efficiently and to recycle them in an environmentally friendly way". The institute's tasks also include advising German commerce on prospecting for, exploring and extracting domestic resources. The search for new sites to exploit and the evaluation of known deposits, some of which have been mined previously, are currently taking place mainly in the German states of Thuringia and Saxony.⁹

The importance of establishing these information and advisory systems as a German federal government contribution to promote industry and commerce and to secure resources is not to be underestimated.

Raw materials partnerships

Raw materials partnerships are a further key element of the German resources strategy. The German government's intention is to create a framework whereby German industry helps resource rich partner countries e.g. by investing in infrastructure projects, and gains preferential access to resources in return. The partnership agreements forge a framework between countries which is binding in international law and lays a firm foundation for the conclusion of contracts between industrial companies under private law. So far partnership agreements have been concluded with **Mongolia** and **Kazakhstan**. Among other factors, the choice of Germany's "raw-material partner countries" is based on research by the Federal Institute for Geosciences and Natural Resources into countries of importance or potential importance for Germany's resource supply. Discussions are in progress with other countries including Zambia, Angola, Namibia, the Republic of South Africa, Bolivia, Peru, and

⁸ DERA is now based in Berlin and Hannover.

⁹ The company Deutsche Rohstoff AG is engaged in prospecting and exploration in the Erz mountains for the high-tech metals indium and gallium.

some countries in Central Asia. Although it has not been formalised, a raw materials partnership with Russia has been in place for several years.

Partner country: Kazakhstan

Area: 2,724,900 km² Population: 15,888,000 Gross national income: US\$ 6,920 per capita¹⁰

Raw materials:

Crude oil and natural gas; Kazakhstan is the world's largest uranium producer; bauxite, chromium (third largest producer in the world), gold, iron, manganese, zinc; also rare earths, indium, germanium etc. The metallurgical sector is one of the country's most important branches of industry.

Economic significance of the raw materials sector:

79% of exports are mineral products (primarily petroleum and natural gas) and secondary refined products.

Kazakhstan is the leading economic power in Central Asia and Germany's most important trading partner in the region: 86% of Germany's trade with Central Asia, by volume, is transacted with Kazakhstan, and it is the destination of 66% of German exports to this region.¹¹

Human rights situation in Kazakhstan

The Federal Foreign Office states that Kazakhstan has only made limited progress in the direction of a state under the rule of law. President Nazarbayev has governed the country since 1990. Corruption and arbitrary penal procedures continue to pose major problems. The violent suppression of a demonstration in Zhanaozen on 16 December 2011 drew international attention. The demonstration was connected to an oil-industry workers' strike that had lasted since May.

Human Rights Watch, recording the incidents, ¹² states that directly after the disturbances from 16 to 21 December all telephone lines in Zhanaozen were disabled, as were certain web sites across the country including twitter.com. During these four days, Kazakh authorities arrested hundreds of people. According to statements by Human Rights Watch and others, both victims and witnesses reported that police officers indiscriminately kicked detainees and beat them with batons. Police officers forced prisoners to strip naked, trampled them to the ground and exposed them to freezing temperatures. Furthermore, Human Rights Watch documented the death of 50-year-old Bazarbai Kenzhebaew, who was arrested in the street on 16 December. He died of injuries that had apparently been inflicted on him while in custody.

At least three oil workers, all of whom had publicly voiced support for the striking workers' demands, were charged with "organising mass disturbances". In January, three opposition activists were arrested because for allegedly having "incited social unrest", a crime that is so vaguely and ambiguously defined that it contravenes the standards of basic human rights. The authorities blame Vladimir Kozlov, leader of the unofficial opposition party Alga, for having instrumentalised the workers' strike "in order to incite social unrest and destabilise the situation in the region".

In response to a written question from Ute Koczy, Member of the Bundestag (Green Party), the German federal government stated that Nazarbayev had promised an inquiry and had already taken initial steps. Human rights organisations like Human Rights Watch are calling for charges against

 $^{^{\}rm 10}$ Data taken from Fischer world almanac: Fischer Weltalmanach 2012

http://www.bmwi.de/BMWi/Navigation/Aussenwirtschaft/Bilaterale-Wirtschaftsbeziehungen/laenderinformationen,did=316524.html

¹² http://www.hrw.org/de/news/2012/02/06/kasachstandeutschland-menschenrechte-sollen-grundlage-für-gute-beziehungensein

activists to be dropped, freedom of the press and freedom of assembly to be respected, and an end to the intimidation of journalists. Whether a raw materials partnership is a means of persuading the head of state President Nazarbayev to adhere to human rights is doubtful to say the least.

It is inevitable that the partnership agreements, by their very nature, will be geared towards economic interests. Nevertheless, it is striking that no preconditions are being put in place to bring about any actual structural improvement in conditions in the mining sector. For Kazakhstan in particular, this is a matter of some importance since it is not a partner country of German development cooperation.

Although the agreements make mention of both transparency and the implementation of environmental and social standards in resource extraction and processing, ¹³ no measures are specified that would be conducive to these. The opportunity has not been taken to involve either civil society organisations or the existing multi-stakeholder committees of the Extractive Industries Transparency Initiative (EITI) in the given countries ¹⁴ with a view to taking genuine steps in the direction of greater transparency and respect for human rights and standards in the extractive sector. It must therefore be feared that raw materials partnerships with authoritarian regimes – as in Kazakhstan – serve to strengthen these regimes. Anton Artemyev of the International Centre for Transparency and Accountability in Almaty therefore calls for the citizens of both countries to be kept fully and regularly informed on the implementation of the partnership, as a minimum requirement

Mongolia, in contrast, is a partner country of German development cooperation, which has been working there for several years on transparency and good financial governance issues in the resources sector. Nevertheless, in the context of raw materials partnerships, once again both Germany and the partner country view development cooperation as something of a "by-product", since the inherent logic of raw materials partnerships is to secure the supply of raw materials rather than development cooperation – in one observer's view. Development coupled with a reduction in economic dependence upon China and Russia is in the country's interests. The agreement with Germany places an emphasis on the technical development of coal processing and liquefaction, black metallurgy production, and the processing of nonferrous and industrial metals (Art.5).

¹³ See: Agreement of 13 October 2011 between the Government of the Federal Republic of Germany and the Government of Mongolia on cooperation in the fields of raw materials, industry and technology, and Agreement of 8 February 2012 between the Government of the Federal Republic of Germany and the Government of the Republic of Kazakhstan on partnership in the resource, industrial and technological sectors

¹⁴ Both Mongolia and Kazakhstan are members of EITI.

Partner country: Mongolia

Area: 1,564,100 km² Population: 2,515,000 Gross national income: US\$ 600 per capita.

Raw materials: Copper, gold and coal, tungsten and fluorides; uranium, iron ore, rare earths and petroleum are increasingly gaining attention.

Economic significance of the raw materials sector: Coal accounts for 31.2% of all exports, followed by copper concentrate at 27.8%, iron ore and concentrates 15.7%, and crude oil 8.1%.

The gross domestic product of Mongolia 15 rose by 15% in 2011, but despite this relative upturn, the number of people living in poverty in 2011 was around 36.9%, a figure that has remained unchanged for the last 15 years. Although the population receives small payments directly from mining profits (between US\$ 15.50 and 51.90 per person per month), these have not helped to improve their living situation. Furthermore, alarming mismanagement prevails in the administration of mining revenues. CO_2 emissions and air pollution are high, not because industrialisation is very far advanced but due to outdated coal-fired power plants, old vehicles and failure to monitor emission limit values. The majority of the rural population are nomads and pastoralists. Although Mongolia is only a sparsely populated country, mining displaces many rural people from their pasture lands into the city (to Ulaanbaatar), where they now form a poverty belt.

Sukhgerel Dugersuren from the Mongolian non-governmental organisation OT Watch has therefore called for the local population in the region to be appraised of its rights. "Civil society organisations in Mongolia are only now starting to learn how to monitor the activities of the mining industry. Without external support it is impossible to document, communicate and present the assessment of impacts in the locality in such a way as to bring about a policy dialogue. The local population needs to learn about human rights and environmental standards, responsible mining practices and compliance with appropriate management plans. Financial support is necessary for these communities in order to facilitate monitoring, documentation and communication."

Germany could also help to improve the laws on mining and the environment that are currently under discussion, says Sukhgerel Dugersuren. Theoretically this would be possible within the framework of the agreed partnership. To do so, the German government need only look beyond the industry associations and open up the process to civil society organisations as well.

Alliance for securing raw materials

The German raw materials strategy, in fact, goes far beyond raw materials partnerships and the "raw materials for technology/industrial aid" approach. Another component of the raw materials strategy is the backward integration of German industry, i.e. embarking on mining activities to secure supplies. At the end of January 2012, twelve companies — Aurubis, BASF, Bayer, BMW, Chemetall, Daimler, Evonik Industries, Georgsmarienhütte Holding, Bosch, Stahl-Holding-Saar, ThyssenKrupp and Wacker Chemie — came together to form the "Alliance for securing raw materials" (Allianz zur Rohstoffsicherung) and to cooperate on extractive projects abroad. It is intended to become a "globally operating, profit-oriented resource organisation", the concept for which was developed by the BDI. On launch, the raw materials alliance plans to initiate four raw materials ventures. According to the press release, these are targeted at deposits of rare earths, tungsten and the coking coal used in the steel

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¹⁵ Data compiled by Sukhgerel Dugursen for the sectoral dialogue between the Heinrich Böll Foundation and Südwind on raw materials partnerships, 6 March 2012

industry.¹⁶ Participation in a large-scale project including extraction, processing and sale of raw materials is also planned. The participating companies in the raw materials alliance would then obtain preemption rights.

"The companies are confident that Chancellor Angela Merkel will assist the organisation of the project by establishing contacts with the governments of the resource-rich states. The Federal Foreign Office and the Economics and Development Ministries are already involved in the project." (*Handelsblatt*, 2 November 2011). Federal Economics Minister Rösler has already promised support. What shape this support will take remains unclear as yet. All in all, there is relatively little publicly accessible information about the raw materials alliance. Whether it is planned to support the alliance with a raw materials fund similar to the one that existed in the 1970s to support exploration projects by German mining companies, or by some other means, remains undecided as yet, according to statements from the Economics Ministry.

Promotion of foreign trade

Beside maintaining raw materials partnerships, setting up information systems and promoting backward integration of individual companies, another pillar of German federal government support for raw materials supply consists of its instruments for foreign trade promotion. Government untied loan guarantees (Ungebundene Finanzkredite, UFK), in particular, are aimed at safeguarding resource supplies. Untied loan guarantees are used to support projects abroad that are not tied to German deliveries but are particularly in the national interest of the Federal Republic of Germany. Reforms were made in 2009 to the instruments for promoting foreign trade. The coverage of investment guarantees was extended and the risk coverage for untied loan guarantees was broadened to encompass economic risks. This was done to create incentives for industry to invest directly in raw materials projects. Whereas in the 1960s and 1970s demand for untied loan guarantees was still relatively high, it subsided in the 1990s due to the plentiful supply of resources. After the reform, according to the Federal Ministry of Economics and Technology (BMWi), untied loan guarantees were once again concluded, for the first time in more than ten years, for an iron ore project in Mauritania and for the Nord Stream pipeline from Russia to Germany. Other projects, e.g. for copper extraction, are currently being examined.

Imposing conditions or seeking opportunities to strengthen the observance of environmental and social standards and human rights were not considered in the course of the reform process even though such standards and rights are especially at risk in the mining and petroleum sector. Neither were matters of transparency examined separately. For example, EITI membership of the resource country or company is not included among the criteria for loan guarantee award.

Alongside the classic instruments of foreign trade promotion (export credit guarantees, investment guarantees, untied loan guarantees) the Economics Ministry provides other incentive and promotion measures. For instance, the "New Target Markets" initiative was brought into being in the aim of accessing new markets outside the BRIC countries.¹⁷ Here again, securing raw materials is accorded huge importance. Presentations of the initiative ¹⁸ have referred explicitly to the supply of resources and the possibility of strategic raw materials partnerships with the "target markets" of Colombia,

¹⁶ http://www.manager-magazin.de/politik/deutschland/0,2828,787235,00.html, Deutsche Industrie schließt Rohstoffallianz, 21 September 2011

¹⁷ Brazil, Russia, India and China

¹⁸ For example, by Federal Minister of Economics Philip Rösler on 13 September 2011 at the ceremony marking the 50th anniversary of untied loan guarantees.

Vietnam, Malaysia, Nigeria, Mexico and Indonesia. Prominence is also given to coordinating the promotion of foreign trade with development cooperation.

Development cooperation

In the course of implementing the raw materials strategy, the Federal Ministry for Economic Cooperation and Development (BMZ) has drawn up its own strategy¹⁹ which is primarily geared towards good governance and the mobilisation of revenues from the mining sector for development.

The BMZ has now brought into being the Global Development Policy Raw Materials Initiative (GeRI), which essentially concentrates all the instruments of development cooperation and facilitates coordination among the organisations that carry out development interventions – Gesellschaft für Internationale Zusammenarbeit (GIZ – German International Cooperation) and the Federal Institute for Geosciences and Natural Resources (BGR) – for the better implementation of raw materials projects. GeRI prioritises human rights, implementation of environmental and social standards, mechanisms for involving civil society, and observance of the rule of law in the mining sector. It adopts the "do no harm" approach. In practice, German development cooperation supports a range of EITI member countries in the implementation of the transparency initiative on the respective national levels, the establishment of a certification system in the Great Lakes region and the establishment of statutory conditions for mining.

But even GeRI operates from the standpoint of industrial and commercial interests, in that development cooperation is explicitly intended to support German resource interests. The conflict between development-policy objectives and the interests of commercial associations emerges clearly from the current debate on binding transparency requirements in the raw materials sector.

Insufficient coherence

On 25 October 2010 the EU Commission put forward two Proposals for Directives on transparency in the resources sector (COM(2011) 684 and COM(2011) 683) which are currently under consultation. The proposals of the European Commission aim to oblige all European mining, crude oil and natural gas companies as well as the logging industry to disclose their payments to the public purse on a project-by-project basis. The proposed scheme is modelled on a similar regulation in the USA, the US Dodd Frank Wall Street Reform and Consumer Act of July 2009, which obliges all mining and petroleum companies listed on the US stock exchanges to publish their payments to governments worldwide, broken down by country and project.

Development policy institutions view this as a consistent way of moving forward in the fashion established by the Extractive Industries Transparency Initiative. Gudrun Kopp, state secretary at the BMZ, already emphasised her support for mandatory transparency rules at the last EITI conference in Paris in 2011. Likewise, members of the Bundestag Committee on Economic Cooperation are voicing cross-party support for mandatory rules to combat corruption and bribery in this sector. Nevertheless, at the first official hearing on the EU Directive at the Competitiveness Council on 20 February 2012, the German federal government spoke out against project-based disclosure obligations for the mining and petroleum industry in Europe. If the German federal government maintains this position, it is squandering an important opportunity to shape German and European resources policy in such a way

¹⁹ Extractive Resources in German Development Cooperation, BMZ Strategy Papier 4/2010e

that account is taken not only of industrial interests but also of the interests of the population of resource-rich (developing) countries.

It is, however, imperative to strive for coherence between resources policy and human rights and development policy aspects if the economic, social and ecological development of resource-rich countries is truly to be promoted.