

Methodology

This article draws on interviews with people working with legal and advocacy organisations and activist networks in Spain, Portugal, Norway, and Serbia involved in the first wave of Requests for Internal Review (RIRs) under the Critical Raw Materials Act (CRMA).

We connected with Joám Evans Pim of [Ecologistas en Acción](#) and Fundación Montescola, who has been working on six [RIR cases in Spain](#) involving the Aguablanca, Las Naves, Mina Doade, El Moto, La Parrilla, and Las Cruces projects.

We exchanged insights with Ilze Tralmaka of [ClientEarth](#), involved in the [Barroso case](#) alongside Associação Unidos em Defesa de Covas do Barroso and MiningWatch Portugal.

We spoke with Simon Simanovski, formerly with [Green Legal Impact](#) in Germany and now with [Rechtsanwälte Günther](#), working on the [Jadar case](#) with Centrul Independent pentru Dezvoltarea Resurselor de Mediu in Romania.

And we gathered perspectives from [Stephanie Roth](#), an activist historically involved in controversial mining projects and part of a network collaborating around RIRs and legal interventions in critical minerals extraction, and from Helene Sofie Smit of [Natur og Ungdom](#) and Ella Marie Hætta Isaksen, who have been mobilising for years against the [Nussir project](#) in Norway, in collaboration with [Friends of the Earth Europe](#).

These conversations offer only a snapshot of the work that civil society has done to challenge Strategic Projects. Many other organisations have submitted RIRs under tight deadlines and with limited resources. SOMO is not involved in these cases and does not speak on their behalf. Instead, we aim to highlight lessons emerging from the use of RIR procedures across different contexts to help others navigate similar processes for future Strategic Project designations.