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Framing Critical Minerals: Hybridising Economic, Environmental, and Security Objectives in EU Trade Discourse

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Abbreviations

ASEAN	Association of Southeast Asian Nations
CETA	Comprehensive Economic and Trade Agreement
CJEU	Court of Justice of the European Union
CM	Critical mineral
CMA	Critical minerals agreement
CRMA	Critical Raw Materials Act
DG Trade	Directorate-General for Trade
DI	Discursive institutionalism
DRC	Democratic Republic of the Congo
EU	European Union
FTAs	Free trade agreements
IRA	Inflation Reduction Act
ISDS	Investor-state dispute settlement
MSP	Minerals Security Partnership
RMI	Raw Materials Initiative
TTIP	Transatlantic Trade and Investment Partnership
US	United States
WTO	World Trade Organization

Executive Summary

Critical minerals have become a central focus of European Union trade discourse at the intersection of global sustainability goals, economic competitiveness concerns, and growing supply-chain vulnerabilities.

Drawing on discursive institutionalism and the literature on framing, this paper uses the concept of “framing hybridisation” to describe how the European Union’s trade discourse on critical minerals has evolved in response to external shocks, internal agency shifts, and the engagement of key stakeholders. The findings, based on co-occurrence analysis and time-series discourse mapping of DG

Trade communications between 1989 and 2025, reveal a three-phase framing hybridisation process, in which discourse grows in complexity through the strategic selection of additional frames. Initially, critical minerals were framed primarily through an economic lens, with emphasis on liberalisation and competitiveness. In a second phase, the environmental frame gained prominence, emphasising

concerns over mining practices and the role of critical minerals in the green transition. More recently, a security frame has surged, focused on reducing strategic dependencies and enhancing supply-chain resilience. Since 2020, these three frames have become increasingly hybridised, reflecting a broader transformation in the European Union’s approach to trade policy in response to global uncertainty.



1. Introduction

Critical minerals (CMs) are essential to clean energy, defence, and digital technologies, and demand for them is projected to surge in the coming decades. However, their production and, more acutely, their processing remain concentrated in only a handful of countries, creating important dependencies and supply-chain vulnerabilities that could reshape global trade governance. CM-importing countries have only recently fully appreciated these risks (Kalantzakos 2020, p. 3) and responded with measures ranging from bilateral critical minerals agreements (CMAs) to national strategic plans. The European Union (EU), which imports over 90 percent of its CMs and is particularly exposed to supply concentration in China and the Democratic Republic of the Congo (DRC), has positioned itself at the forefront of these efforts.

For the EU, CMs represent more than inputs for strategic industries; they expose the limits of existing trade instruments and the narratives behind them in addressing geopolitical and environmental risks. The EU has long viewed market liberalisation, rules-based legal frameworks, and multilateral institutions as mutually reinforcing elements of its trade policy model. Over the past decade, however, this model has faced increasing challenges. The backlash against high-profile free trade agreements (FTAs), such as the Transatlantic Trade and Investment Partnership (TTIP)¹ and the Comprehensive Economic and Trade Agreement (CETA),² marked a turning point (Hübner, Deman & Balik 2017; Laursen & Roederer-Rynning 2017; De Bièvre 2018; Young 2019). Public protests and politicised debates led the European Commission (hereafter Commission) to adjust its trade discourse and policy, expanding its “neoliberal”³ doctrine to

encompass labour rights, consumer protection, and environmental sustainability alongside traditional commitments to market access (Siles-Brügge 2014; Eliasson & García-Durán 2019; Drieghe & Potjomkina 2019; Oleart 2021).

This shift in how certain aspects of reality are emphasised to define and legitimise policy choices, referred to in this paper as framing, accelerated following the COVID-19 pandemic and Russia’s invasion of Ukraine in 2022, which revealed key vulnerabilities and intensified demands for a more resilient and self-sufficient European economy (Helwig 2023; Herranz-Surrallés, Damro & Eckert 2024). Within trade policy, this contributed to a “geoeconomic turn” (Adriaensen & Postnikov 2022; Weinhardt & De Ville 2024), that is, “the use of economic instruments to address negative economic and security externalities of economic interdependence in the context of great power competition” (Couvreur & Veselinović 2025). The 2023 Critical Raw Materials Act (CRMA) reflects this change in priorities by elevating objectives such as strategic autonomy, resilience, and sustainable competitiveness while moving beyond the earlier focus on liberalisation and global value chains (Youngs 2021; European Commission 2025).

This paper examines **how the EU trade discourse on CMs has evolved** concerning three core policy objectives: economic welfare, environmental protection, and security. These competing goals form what I call the trilemma of CM governance. Understanding the Commission’s framing process on CMs is important, as it defines the problem, legitimises the proposed solutions, and may influence public opinion (Benford & Snow 2000; Chong & Druckman 2007). To trace how the EU has navigated this trilemma over time, I rely on a dataset of nearly 1,900 press releases and speeches

from the Commission’s Directorate-General for Trade (DG Trade), combining co-occurrence analysis and time-series discourse mapping (see Section 4.1).

The analysis of DG Trade communications shows that security-related language was mostly absent from trade policy discourse on CMs until the late 2010s. After 2020, however, references to supply-chain security and strategic dependencies became significantly more frequent, indicating heightened concern with geopolitical risk and the need to strengthen the EU’s “economic strategic autonomy.” The environmental frame, for its part, surged following the launch of the European Green Deal. Since 2020, the findings indicate that the economic, environmental, and security frames have become increasingly juxtaposed in EU trade discourse on CMs.

To make sense of these evolving patterns, the paper builds on the framing and discursive institutionalist literatures to propose the concept of framing hybridisation, defined as the strategic combination of policy frames through the interplay of three overlapping factors: trigger events (e.g. supply crises, geopolitical shocks), agency change (e.g. changes in Commission leadership or agendas), and stakeholder engagement (e.g. industry lobbying, civil society demands). Framing hybridisation leads to increasing discursive complexity, as new frames are progressively incorporated to sustain a coherent narrative and engage diverse audiences.

While prior research has tended to examine the environmental and security logics of trade in isolation,⁴ I document their co-evolution in EU trade discourse on CMs. The findings also offer valuable insights for stakeholders involved in designing CMAs or trade agreements. On the one hand, DG Trade’s use of

1. TTIP was a proposed but never concluded agreement between the EU and the United States (US), launched in 2013 and abandoned in 2016 amid strong public opposition, particularly over fears of weakened regulatory standards and investor-state dispute settlement (ISDS).

2. CETA, negotiated between the EU and Canada, was signed in 2016 and has been provisionally applied since 2017. It has faced strong criticism from civil society and some Member States over ISDS provisions, agricultural market access, and perceived threats to social and environmental standards, leaving its ratification by some Member States still pending at the time of writing.

3. In the trade policy literature, neoliberalism is usually understood as a doctrine in which the state’s role is primarily to create markets, foster competition, and protect traders from arbitrary state power, rather than to pursue collective social goals (De Ville & Orbie 2014, p. 151).

4. A notable exception is Leonelli (2025).

hybrid framing may facilitate broader political and societal support by appealing to a range of stakeholders with differing priorities. On the other hand, this discursive strategy can also draw criticism, particularly from actors who consider that the Commission uses hybrid framing “in a minimalistic and superficial

manner” (Jacobs et al. 2023, p.15; see also Holden 2019).

The remainder of this working paper is structured as follows. The next section reviews the relevant literature on EU trade discourse and introduces the case of CM governance. Section 3 presents

the concept of framing hybridisation, its phases, and its drivers. Section 4 describes the data and methods before presenting the empirical results. Section 5 reflects upon the constraints surrounding the EU’s discourse on CMs and concludes with avenues for future research.



2. Shifts in EU trade discourse and policy priorities

2.1 Trade discourse under contestation

The EU's trade policy has traditionally been seen as an extension of its normative and regulatory power. Classic works portray the EU as an actor uniquely equipped to shape global rules, drawing on its market size, dense institutional architecture, and commitment to multilateralism (Manners 2002; Damro 2012). Its influence stems not from coercion but from its ability to diffuse standards on the environment and labour, among others, through its trade policies (Bradford 2020). The Commission is often described as a technocratic regulator that prioritises legal certainty and economic efficiency, consistent with its role in upholding a rules-based international order (Woolcock 2012; Young 2015). Under this paradigm, trade openness was assumed to be mutually beneficial: delivering prosperity at home while supporting economic development and exporting EU norms abroad.

Over time, however, this vision has become increasingly contested. The limits of the EU's normative power became evident as global power shifts and domestic political challenges disrupted the status quo. Scholars have characterised the EU as a “conflicted trade power,” caught between different guiding principles and often divided internally over policy priorities (Meunier & Nicolaïdis 2006; see also Meunier & Vachudova 2018). By the late 2000s, intensifying economic pressures led the Commission to pivot from a predominantly multilateral stance to a more interest-driven agenda exemplified by the 2006 *Global Europe* strategy, in which it stressed the value of comprehensive trade agreements that both protect the competitiveness of its internal market and act against export discrimination (Meunier 2007; Gathii 2011; Elsig & Dupont 2012). Civil society and some European Parliament voices decried this “radicalization of the EU's free trade approach” (Jacobs et al. 2023, p.6) as

“unconditionally opening trade up to the unfettered forces of the free market” (The Greens & European Free Alliance 2018).

In recent years, criticism of the EU's trade policy has grown more vocal and widespread. The public backlash against agreements such as TTIP, CETA, the EU–Mercosur Agreement, and globalisation more broadly revealed that trade could no longer be regarded as a technical or low-salience issue. Instead, it had become a site of political scrutiny and contestation (Young 2016; De Bièvre & Poletti 2020; Laurens, Winkler & Dupont 2024). Scholars analysing this politicisation have shown that the Commission was compelled to adjust its rhetoric to address concerns about globalisation, sovereignty, and democratic legitimacy (Meunier & Nicolaïdis 2019). Rather than an abrupt break, the Commission's discursive response built on earlier ideas (Young 2019), much like its earlier efforts to legitimise free trade in the aftermath of the 2008 financial crisis (De Ville & Orbie 2014). For instance, García-Durán, Eliasson & Costa (2020) argue that the Commission revived and adapted its “managed globalisation” doctrine, first articulated by Pascal Lamy in 1999 and consisting in “going beyond the simple removal of regulations and making some effort to shape and regularize the competitive order,” (Jacoby & Meunier 2010) to regain support in the face of rising contestation against TTIP. The Commission reframed trade as a vehicle for protecting European values and standards while still opening markets. Strategy documents reflect this shift. The 2015 *Trade for All* strategy (European Commission 2014), for example, emphasises transparency, labour rights, and climate goals more prominently than previous official strategy documents, signalling an effort to reclaim public trust through a value-based framing of trade policy.

Recent intensification of geopolitical competition and diplomatic tensions has prompted the EU to further adjust its trade

discourse. The late 2010s brought the US-China trade war, Brexit, and a more belligerent Russia. These developments contributed to the geopoliticisation of EU trade policy (Meunier & Nicolaïdis 2019; Orbie 2021; Herranz-Surrallés, Damro & Eckert 2024). Under Ursula von der Leyen, the Commission explicitly declared itself a “geopolitical Commission,” and trade policy did not escape this evolution (Koenig 2019). The *Trade Policy Review* (European Commission 2021) introduced the notion of an “open, sustainable, and assertive trade policy,” reflecting discursive efforts to align liberal trade commitments with growing strategic concerns over external dependencies. Concepts such as “strategic autonomy,” “resilience,” “decoupling,” “de-risking,” and “reshoring” also entered the official vocabulary of EU institutions (Eliasson & García-Durán 2023, p. 14; García Higuera & Weichert 2023; Jacobs et al. 2023; Arjona, Garcia & Herghelegiu 2025).

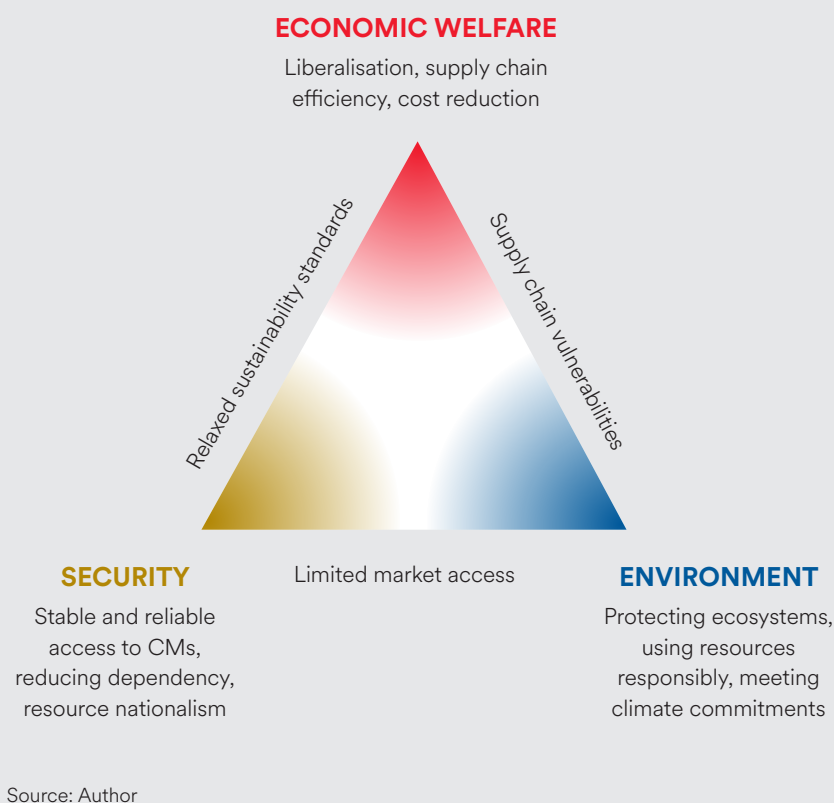
Recent scholarship has examined the emergence of this new framing of trade policy. For example, Schmitz & Seidl (2023) examine how “open strategic autonomy” functions as a discursive device to balance openness with the pursuit of resilience and sovereignty. They show that this concept functions as a “coalition magnet” (Béland & Cox 2015) through qualified openness: “as much openness as possible, combined with as much autonomy as necessary” (Schmitz & Seidl 2023, p. 848). Similarly, Eliasson & García-Durán (2023) argue that the 2021 *Open, Sustainable, and Assertive Trade Policy* repackaged the long-standing managed globalisation doctrine with a more assertive, security-oriented twist.

2.2 Governing CMs

Some studies have traced the evolution of issue linkages within EU trade discourse. Bertram (2023), for example, maps nearly three decades of ideational development in trade and sustainable development, showing how social, environmental, and economic development have been gradually integrated into EU trade discourse. Christou & Damro (2024) trace the evolution of three frames (a market liberal frame, a counter-frame linking trade policy to non-trade issues, and a reframed counter-frame linking trade policy to security) in a small sample of EU official trade documents. Gosselin, Durel & Morin (2025) document the “three-body problem” of trade, environment, and agriculture in the EU–Mercosur negotiations. Despite this growing literature, the governance of CMs remains notably underexplored in the EU discourse scholarship. Yet the EU has positioned itself as a global leader in this domain, establishing so-called “strategic partnerships on sustainable raw materials value chains” with countries including Argentina, Canada, the DRC, and Namibia, and adopting the CRMA in 2023 (Götz & Harnesk 2025).

This increased institutional focus reflects the complex position of CMs at the intersection of three policy objectives: economic welfare, environmental protection, and security. CMs are crucial to the green transition and the development of clean energy technologies. Electric vehicles and energy storage systems, for example, rely on batteries composed of lithium, cobalt, and nickel, while copper and aluminium are used for producing electric vehicle components, transmission infrastructure, and renewable energy systems, such as wind turbines and solar panels (Hund et al. 2020). According to the International Energy Agency (2024), demand for CMs in clean energy technologies is expected to double by 2030 under current policies and nearly quadruple by 2040 in a net-zero scenario. Moreover, CM extraction is associated with severe environmental degradation, including deforestation, water contamination, and biodiversity loss (Watari et al. 2020), as well as social harms, such as displacement and human rights violations, particularly affecting Indigenous communities (Dou et al. 2023; Amoah et al. 2024; Ash 2024).

Figure 1. The CM Governance Trilemma



The increasing dependence is further compounded by the high geographic concentration of CM supply. While many countries hold reserves of CMs, extraction is concentrated in a few producers, with Australia and Chile leading in lithium, the DRC in cobalt, and Chile and Peru in copper. Refining and processing are even more geographically concentrated, with China accounting for the dominant shares in graphite, rare earth elements, cobalt, and lithium (Ritchie & Rosado 2024). This concentration of extraction and especially processing in specific regions, which is projected to remain high or even intensify by 2040 (International Energy Agency 2024), increases the risks of price volatility, supply chain disruptions, and geopolitical tensions.

Integrating economic welfare, security, and environmental protection into a coherent discourse (or policy) presents a structural trilemma (see Figure 1). This trilemma does not imply that only one or two objectives can be pursued at a time. Rather, it reflects the fact that

pursuing all three goals often involves difficult trade-offs, as advancing one goal may create pressure on the others. For instance, ensuring secure access to CMs may lead the EU to favour suppliers based on strategic alignment rather than sustainability standards. Conversely, stringent environmental standards may narrow the pool of eligible suppliers, increasing dependence on a small number of producers and exposing the supply chain to new vulnerabilities. These constraints may also lead to higher costs, with potential implications for economic competitiveness and increased financial pressure on consumers. In addition, resource-rich countries may view EU environmental conditionality as a form of green protectionism, intensifying tensions over resource sovereignty and the legitimacy of trade norms. The following section presents the concept of framing hybridisation as a framework for analysing how the Commission strategically negotiates these trade-offs in contexts of uncertainty, contestation, and crisis.

3. Framing hybridisation

3.1 Discursive institutionalism

To analyse framing shifts in EU trade discourse on CMs, I draw on the theoretical framework of discursive institutionalism (DI). DI underscores the role of ideas and discourse as dynamic forces, positing that shifts in discourse often initiate policy change (Schmidt 2011). For DI scholars, discourse is not reducible to material interests or structural pressures; it shapes the way actors understand their interests, identities, and choices (Schmidt 2008). It also enables them to define problems, legitimise solutions, and build coalitions for change. Importantly, Schmidt (2008, p. 310) distinguishes between two types of discourse: *coordinative discourse* among policy actors, through which they exchange ideas and formulate policies, and *communicative discourse* between policymakers and the public, through which policymakers explain and legitimise policies. In the case at hand, the Commission *coordinates* internally with Member States and across its directorates to forge common narratives, while it *communicates* those narratives externally to citizens and international partners to justify its trade agenda and reinforce legitimacy.⁵ This paper focuses on the latter.

Framing is a central concept closely associated with this body of literature.⁶ According to Entman (1993), “to frame is to select some aspects of a perceived reality and make them more salient in a communicating text, in such a way as to promote a particular problem definition, causal interpretation, moral evaluation, and/or treatment recommendation.” However, the framing literature (e.g. Schön & Rein 1994; Payne 2001; Daviter 2007; Hulst & Yanow 2016; Zimmermann, Albers & Kenter 2022) tends to examine frames in isolation or in opposition, with

limited attention to how they may gradually be combined in policy discourse. While there are a few notable exceptions, the relevant literatures tend to use different terms to describe the process of combining frames. For instance, in the social movement literature, Benford & Snow (2000, p. 624) briefly refer to *frame bridging* as “the linking of two or more ideologically congruent but structurally unconnected frames.” In organisational studies, Werner & Cornelissen (2014, p. 1456) introduce the concept of *frame blending* as “the discursive combination of two separate schemas that share some abstract structure, or as the incorporation of words and elements of one schema into that of another.” In DI, an analogous process has been described as *bricolage*, the “stabilization or changing of institutions through a creative recombination of existing ideational and institutional resources” (Carstensen 2011a; Carstensen & Röper 2024).

Despite these insights, the variation in wording and conceptualisations makes the process appear more ambiguous than it is. Moreover, there has been more effort to categorise these discursive strategies than to trace the mechanisms, conditions, and sequencing through which they occur. As a result, we still know little about how such frame combinations emerge and evolve in political discourse.

Building on this, I propose the concept of *framing hybridisation* to describe the discursive process through which policymakers, institutions, and stakeholders justify and legitimise policies by selectively combining frames. I prefer the wording around hybridisation, as it can describe the action (to hybridise), the process (hybridisation), the outcome (a hybrid), and the resulting discursive condition (hybridity). In addition, unlike the term blending, hybridisation does not imply that boundaries between frames are fully blurred or dissolved. Rather, it allows for the coexistence

of distinct, sometimes conflicting elements within a hybrid framing.

While framing hybridisation is not unique to trade policy, I expect it to be particularly frequent in this domain for several reasons. First, modern trade lies at the intersection of multiple and often competing policy goals, as the case of CMs illustrates. This overlap with adjacent policy fields creates persistent tensions that require flexible discourse. Second, with the growing politicisation of trade policy, policymakers are under pressure to build broader coalitions and navigate diverging stakeholder expectations to “create resonance in the public and support in the political system” (Carstensen 2011a, p. 157; Laurens, Winkler & Dupont 2024). Third, trade is highly sensitive to external conditions, such as shifts in global demand, supply chain pressures, crises like recessions or inflationary shocks, and geopolitical tensions, which may prompt frequent reassessments of existing frames.

3.2 Drivers and patterns of framing hybridisation

I expect three main interrelated factors to drive framing hybridisation. The first is *trigger events* that destabilise the credibility of the prevailing frame. These include economic disruptions, such as the 2008 financial crisis or the 2010 Eurozone crisis; geopolitical tensions, such as the US–China trade war under the first Trump administration or Russia’s invasion of Ukraine in 2022; and systemic shocks, such as the COVID-19 pandemic. Such events may disrupt embedded background ideas and create openings for discursive change (e.g. Widmaier, Blyth & Seabrooke 2007; Boin, ‘t Hart & McConnell 2009; Schmidt 2013; 2016; Jacobs et al. 2023).

The second factor is *agency change*, which shapes the internal environment in

5. Although decision-making on trade policy also involves the European Parliament and the Council, this paper concentrates on the Commission’s discursive role as agenda-setter and communicator.

6. For an overview of the framing literature in public policy, see van Hulst & Yanow (2016); for framing in social movement studies, see Benford & Snow (2000); and for policy framing in the EU context, see Daviter (2007).

which frames evolve. In the EU context, changes in Commission leadership or broader strategic visions can elevate certain ideas while marginalising others (Tömmel 2013; Müller & Tömmel 2022, p. 317). Each Commission and Trade Commissioner brings their own priorities and style, though these are shaped by political bargains among Member States. Under the Prodi Commission (1999–2004), trade was closely tied to multilateralism, global governance, and the EU’s enlargement and development agendas. The Barroso era (2004–2014) introduced a more growth-oriented approach. The Juncker Commission (2014–2019) responded to rising public contestation by reframing trade as values-based. Under the current von der Leyen Commission (2019–), trade is now more explicitly tied to security, climate goals, and digital sovereignty, reflecting a more crisis-sensitive posture (Baracani 2023). These institutional dynamics influence how trade objectives are framed, which frames gain prominence, and which ones the Commission perceives as legitimate.

The third source of change is *stakeholder engagement*. A wide array of actors from business associations and trade unions to non-governmental organisations, think tanks, and governments are not merely recipients of DG Trade’s communicative discourse, but also “contribute to it” (Schmit 2008, p. 310; 2011, p. 118), in line with their interests and values (Keck & Sikkink 1998). Industry voices frequently centre their arguments on competitiveness and jobs, while civil society actors tend to focus on sustainability and justice (Del Felice 2014; Hannah 2016; Thomas 2021). Member States also influence the evolution of trade discourse by articulating national priorities, as illustrated by France’s advocacy for a more sovereign “Europe puissance” (Wasson 2024). Policy diffusion from countries outside of the EU may also contribute to discursive change (e.g. Braun & Gilardi 2006; Gilardi, Shipan & Wüest 2021). DG Trade operates at the crossroads of these inputs. Its officials often respond by constructing composite framing that seeks to accommodate multiple

audiences and build support across constituencies. As Schmitz & Seidl (2023, p. 837) put it: “the Commission’s policy entrepreneurship manifests itself in uniting diverse actors under a common banner – one that allows for the formulation of a broad but shared vision that can subsequently guide policy-making.”

The three factors described do not operate in isolation. A geopolitical crisis can simultaneously trigger new demands from stakeholders and prompt agenda adjustments within the Commission. Together, these interacting forces often lead to a reconfiguration of framing that reflects their cumulative effects.

I also expect framing hybridisation to follow a three-phase process of increasing discursive complexity over time, though the second and third phases may overlap or recur in a non-linear, iterative manner (see Figure 2). In the first phase, a single prevailing frame provides the foundational policy orientation. In the second phase, this frame is destabilised by external shocks, agency shifts, or stakeholder contestation, which bring alternative frames (or “counter-frames,” see Christou & Damro 2024) to the fore. This phase corresponds to what Carstensen (2011b, p. 606) calls incremental ideational change, which consists of either a change in an idea’s constituent elements or a change in the relationships among those elements. In the third phase, hybrid framing comes to dominate, and multiple policy objectives are no longer treated as separate issue linkages but fused into a more coherent narrative. This does not mean that competing frames are fully reconciled or integrated beyond cosmetic layering. In the words of van Hulst & Yanow (2016, p. 97), actors “draw certain features of an intractable policy situation together, thereby both rendering them more coherent and graspable and diverting attention from their ambiguities and uncertainties.” Importantly, I expect new frames to be layered onto existing ones rather than fully replacing them. Lastly, the trajectory beyond Phase 3 is open-ended. Over time, the hybrid framing may be stabilised and institutionalised, giving rise to a more durable narrative framework. Alternatively,

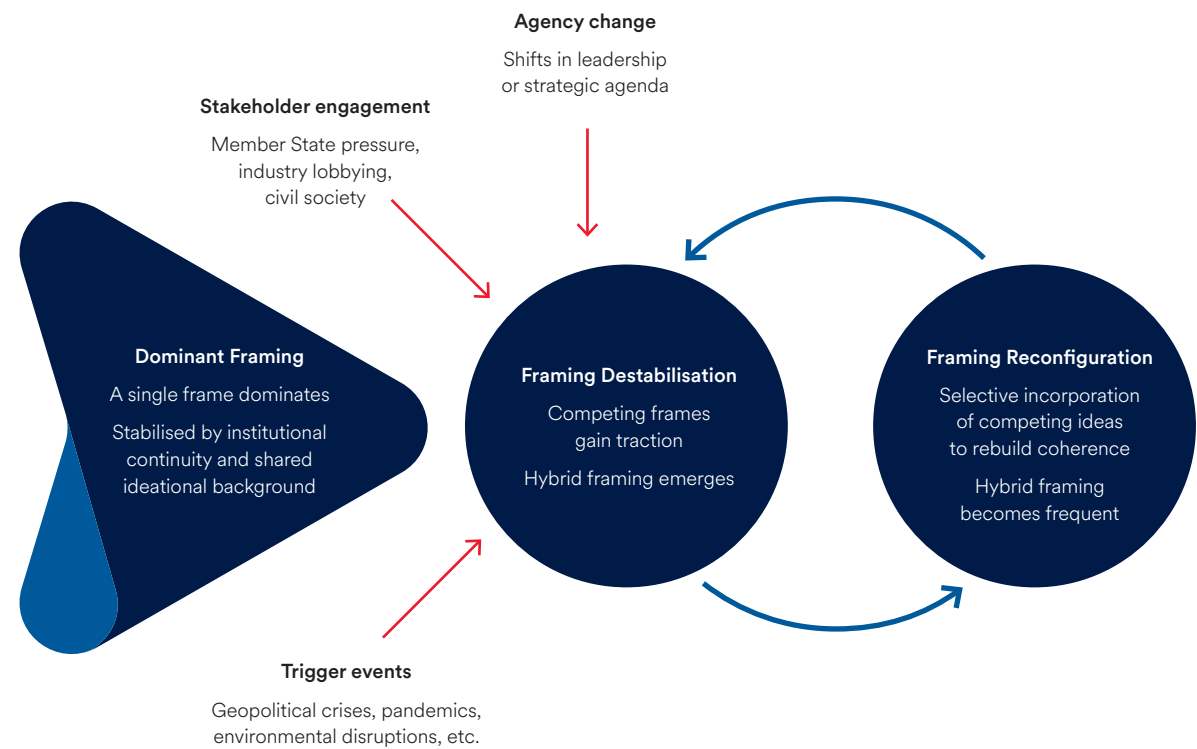
the hybrid framing may face renewed destabilisation (Phase 2), leading to further reconfiguration.

Beyond the well-documented hybridisation of trade, environmental, and labour frames (e.g. Bertram 2023; Govaert 2024; Hamilton 2025; Happersberger & Bertram 2025), the EU’s agricultural trade discourse provides another compelling example of framing hybridisation. Initially, the framing was dominated by economic competitiveness and market access. Trade was framed primarily as a tool to enhance EU farm incomes and jobs and to counter competitors abroad. The second phase (mid-2010s) saw this dominance destabilised by environmental and social pressures. Climate change, biodiversity, and deforestation became salient in trade debates. Civil society groups and some Member States began to contest trade deals (CETA, TTIP, and especially the EU–Mercosur agreement) on both agricultural and environmental grounds (Egan 2023; Gosselin, Durel & Morin 2025). Amid mounting contestation, the Commission adapted its agricultural trade discourse by integrating sustainability as another central frame. This shift is most visible from 2019 onward, coinciding with the launch of the European Green Deal and a broader framing pivot toward “sustainable food systems” (European Commission 2024).

Another example of framing hybridisation is the EU’s discourse on digital trade. The initial dominant frame centred on the economic benefits of open data flows. The EU routinely negotiated provisions for the free movement of data in its FTAs, such as in its 2011 agreement with South Korea (Abbott & Lee-Makiyama 2014). The underlying assumption was that an open internet and seamless data exchange would boost Europe’s digital economy, which the Commission was expected to see growing seven times faster than the overall gross domestic product.⁷ This framing was destabilised by the 2013 Snowden revelations, which detailed the scale of US mass surveillance, exposed weaknesses in data protection, and undermined public and corporate trust in transatlantic data transfers (Rossi 2018; Zalnieriute 2018). In 2015, the *Schrems I*

7. Communication from the Commission, ‘On content in the Digital Single Market’, COM(2012) 789 final, 18 December 2012, <<https://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=CELEX:52012DC0789>>.

Figure 2. Framing Hybridisation Process



Source: Author

judgment by the Court of Justice of the European Union (CJEU) invalidated the Safe Harbour arrangement, which had long facilitated EU–US data transfers. The Court found that US surveillance practices failed to provide adequate protection for EU citizens’ personal data, thereby violating fundamental rights under EU law (Vidović 2015). A successor framework, the Privacy Shield, was adopted in 2016 to re- establish a legal basis for EU–US data transfers. However, it was also invalidated by the CJEU in the 2020 *Schrems II* ruling, which found that the arrangement still failed to ensure adequate protection against US surveillance (Manancourt 2020). In response to these trigger events, the Commission reinforced its push for “digital sovereignty,” reframing data governance and cross-border transfers as matters not only of economic competitiveness but also of geopolitical control and the protection of fundamental rights (Christakis 2020; Adler-Nissen & Eggeling 2024).

The next section outlines the methodological approach and data used to examine how such framing hybridisation unfolds in CM-related discourse.

4. The evolution of EU discourse on CMs

4.1 Methodology

This paper investigates how the Commission has framed CMs in its trade discourse over time. To do so, it combines computational text extraction to identify relevant references to CMs; co-occurrence analysis to examine how economic, environmental, and security frames appear together; and time-series discourse mapping to trace their evolution across institutional and geopolitical cycles.

The dataset, compiled by Bertram (2025), comprises 1,868 press releases, speeches, and policy communications issued by DG Trade between 1989 and 10 February 2025. These texts were retrieved from the Commission's online archives (Press Corner) and other official repositories. After initial cleaning and standardisation, I filtered the documents for relevance using a list of CM-related keywords (see Table 1). This yielded a sub-corpus of 148

documents, meaning that 8 percent of DG-Trade communications in the dataset mention CMs. Since framing often occurs at the paragraph rather than the sentence or word level, I segmented the corpus into 8-sentence framing windows. In other words, each time a CM-related term appeared in a document, that sentence and its surrounding context (± 4 sentences) were extracted as a unit. In total, 812 windows were obtained. I then manually reviewed each window to exclude false positives, since not all references to "raw materials" concern critical ones,⁸ even though Commission officials may still use the broader term. I then conducted a co-occurrence analysis, coding each window for the presence of economic, environmental, or security frame indicators based on the keyword lists in Table 1, followed

by a manual review to ensure coding reliability and avoid false negatives.

Additional secondary sources, such as academic literature, media articles, and think tank reports, were used to enrich the interpretation and assess how the framing of CM was received and perceived beyond the institutional confines of DG Trade. The Commission's discourse was also situated in the context of major developments, using a timeline of potential trigger events: the EU Raw Materials Initiative (RMI) (2008), China rare earths export crisis (2010), the Paris Agreement on climate change (2015), the European Green Deal (2019), the COVID-19 pandemic (2020), Russia's invasion of Ukraine and the US Inflation Reduction Act (IRA, 2022), and the CRMA (2023).

Table 1. List of keywords used for computational text extraction and co-occurrence analysis.

Critical minerals	battery value chain, boron, cobalt, critical mineral*, CRM*, gallium, germanium, graphite, indium, lithium, manganese, mineral supply chain*, nickel, rare earth*, raw material*, refining capacity, tungsten
Environmental protection	biodiversity, carbon footprint, circular economy, climate action, climate change, climate neutrality, decarbonisation, deforestation, ecological impact, environmental impact, environmental protection, environmental standards, ESG standards, GHG emissions, green deal, green economy, green transition, greenhouse gas, just transition, land degradation, mining impacts, nature protection, Paris agreement, pollution, recycling, resource efficiency, responsible sourcing, reuse, sustainab*
Economic welfare	affordab*, compet*, consumer access, cost, econom*, export*, FDI, financial incentives, growth, import*, industrial base, industry, innovation, investment*, job*, level playing field, market access, price*, productivity, SME*, strategic sector*, tariff reduction, trade, trade agreement*, value chain*
Security	alliance*, autonomy of action, de-risking, dependenc*, diversif*, economic coercion, economic security, EU sovereignty, foreign interference, friend-shoring, geopolitical, military, near-shoring, over-reliance, resilien*, security, single-source risk, strategic autonomy, strategic stockpiling, supply chain vulnerability*, supply risk*, supply security, weaponisation

Note: Asterisks (*) indicate the use of wildcard operators to account for word variations. For example: "critical mineral*" captures both critical mineral and critical minerals; "sustainab*" captures both sustainable and sustainability, etc.

8. For instance, several speeches mention agricultural raw materials, such as sugar.

4.2 Empirical analysis

Phase 1 – Timid emergence under the dominant liberal framing (late 2000s)

Until the early 2010s, CMs had not yet emerged as an issue in EU trade discourse. Apart from a brief mention of “restrictions on access to raw materials, particularly restrictive export practices” as an example of broader trade barriers in the global economy, the first substantive reference emerges in Trade Commissioner Peter Mandelson’s (2004–2008) speech introducing the EU’s *Raw Materials Strategy* in 2008.⁹ At this early stage, the framing was exclusively and strongly economic. Mandelson warned of the competitive implications of restricted access, noting that “we now count at least 450 export restrictions on raw materials across the global economy, and I am absolutely certain that this is an underestimate.” He drew attention to the sensitivity of the EU’s competitiveness to raw material supply and pricing: “Our competitive advantage is already acutely sensitive to the supply and the costs of these inputs.” The envisioned policy response was framed in terms of liberal trade commitments: “writing commitments on free trade in raw materials into all our bilateral trade agreements, where they are clear and enforceable” and “continuing to build support for the elimination of export restrictions and an open market in raw materials as a basic principle of a global economy.” This discourse encapsulates the mindset of Phase 1: CMs were talked about as a subset of the broader trade agenda of openness and rule enforcement.

The Commission launched the RMI in 2008,¹⁰ acknowledging for the first time the “critical” nature of certain minerals. The subtitle of the initiative, “Meeting

our critical needs for growth and jobs in Europe,” reflects its primary focus on economic competitiveness and employment. At the same time, the RMI highlights a dependence on “high-tech metals,” such as cobalt, platinum, rare earths, and titanium, which “can even be considered critical in view of their economic value and high supply risks.” It also recognises that “these metals play a critical role in the development of innovative ‘environmental technologies’ for boosting energy efficiency and reducing greenhouse gas emissions.” However, this hybrid framing remains absent from DG Trade’s discourse at the time.

Phase 2 – Framing destabilisation (2010s)

A series of events in the 2010s destabilised the prevailing framing and introduced new frames. The first was the China rare earths episode of 2010. In September of that year, following a diplomatic dispute, China imposed an embargo on rare earth exports to Japan and tightened global export quotas (Kalantzakos 2020, p. 4; Evenett & Fritz 2023). China’s near monopoly over rare earth supply (controlling around 95 percent of global production) led EU policymakers to confront the strategic risks embedded in global supply chains. DG Trade’s reflex was to reassert multilateral rules and market principles. In 2011, the World Trade Organization (WTO) Panel found that China’s export restrictions were not justified on environmental grounds and should be lifted. Trade Commissioner Karel De Gucht (2010–2014) welcomed the WTO ruling under the still-dominant economic frame, calling it “a clear verdict for open trade and fair access to raw materials... one step closer to a level playing field,” and urging China to ensure “free and fair access to rare earth supplies.”¹¹

Throughout the early and mid-2010s, the security frame began to emerge, although

sporadically. Like the environmental frame, it consistently appeared alongside the economic frame. One example is a press release warning of projected shortages for 14 raw materials, citing their “high supply risk ... due to the fact that a high share of the worldwide production mainly comes from a handful of countries.”¹² The *Europe 2020 Strategy*,¹³ published in 2010, also claims that the EU “should aim to decouple growth from energy use and become a more resource efficient economy, which will not only give Europe a competitive advantage, but also reduce its dependency on foreign sources for raw materials and commodities.” Similarly, the 2015 *Trade for All* strategy includes a section on “Securing access to energy and raw materials,” which recognises the “EU’s dependence on imported resources.”

The 2010s also witnessed the rise of the environmental protection frame in EU trade discourse. For instance, the 2010 *Trade as a Driver of Prosperity* Communication¹⁴ stresses that “the link with the development of new technologies has become increasingly evident, bringing to light the critical role of some raw materials in making the EU into a more innovative and greener economy.” In 2011, Trade Commissioner Karel De Gucht delivered a speech on CMs¹⁵ in which he addressed their three dimensions simultaneously, an uncommon approach at the time (see Figure 3). He noted that “there is not a single country in the world that is fully self-sufficient for all the raw materials it needs to sustain its economic growth,” and emphasised the need to “respond to the environmental aspects that arise out of the production and trade of raw materials.” In 2012, during another intervention on China’s rare earth export restrictions, De Gucht maintained his critique of trade distortions but also framed the issue in explicitly environmental terms: “The EU

9. Speech by Peter Mandelson, ‘The challenge of raw materials’, 29 September 2008, <https://ec.europa.eu/commission/presscorner/detail/en/speech_08_467>.

10. Communication from the Commission to the European Parliament and the Council, ‘The raw materials initiative: meeting our critical needs for growth and jobs in Europe’, SEC(2008) 2741, 4 November 2008, <<https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:52008DC0699>>.

11. EU Press Release, ‘EU welcomes WTO report on China’s export restrictions on raw materials’, 5 July 2011, <https://ec.europa.eu/commission/presscorner/detail/en/ip_11_834>.

12. EU Press release, ‘Report forecasts shortages of 14 critical mineral raw materials’, 17 June 2010, <https://ec.europa.eu/commission/presscorner/detail/en/ip_10_752>.

13. Communication from the Commission, ‘EUROPE 2020 A strategy for smart, sustainable and inclusive growth’, COM(2010) 2020, 3 March 2010, <<https://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=COM:2010:2020:FIN:en:PDF>>.

14. Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions, ‘Trade as a driver of prosperity’, SEC(2010) 1269 final, 9 November 2010, <[https://aei.pitt.edu/38023/1/SEC_\(2010\)_1269.pdf](https://aei.pitt.edu/38023/1/SEC_(2010)_1269.pdf)>.

15. Speech by Karel De Gucht, ‘Raw Materials: The Role of trade in dealing with pressures in commodities markets’, 14 June 2011, <https://ec.europa.eu/commission/presscorner/detail/en/SPEECH_11_438>.

supports and encourages all countries to promote an environmentally friendly and sustainable production of raw materials. However, the EU believes that export restrictions do not contribute to this aim; there are more effective environmental protection measures that do not discriminate against foreign industries.”¹⁶ Although the statement mentions environmental protection, it does so mainly to discredit China’s use of environmental concerns as a justification for export restrictions. In other words, the environmental frame is acknowledged rhetorically but subordinated to trade liberalisation.

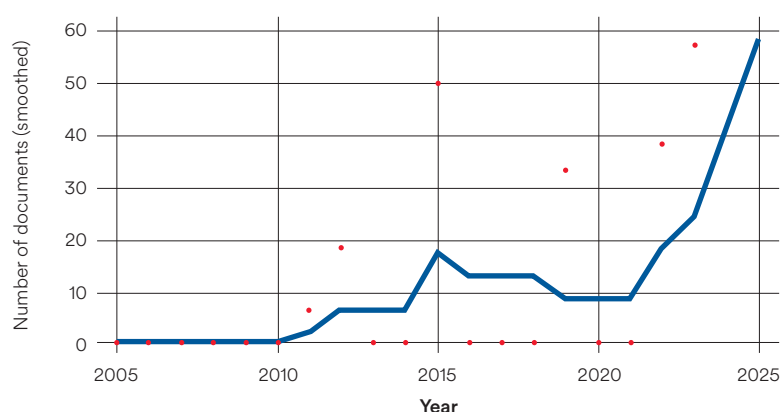
Under Trade Commissioner Cecilia Malmström (2014–2019), the Commission reaffirmed this subtle environmental framing in a subsequent press release issued in 2016 when, following two successful legal actions in 2012 (DS394) on “various raw materials” and 2014 (DS431) on rare earths, tungsten, and molybdenum (Bond & Trachtman 2016; Crochet & Zhou 2024, p. 153), the EU launched a third legal challenge to China’s restrictions concerning graphite, cobalt, copper, lead, chromium, magnesia, talcum, tantalum, tin, antimony, and indium.¹⁷ Once again, the economic frame remained prominent: in a joint conference call with the US Trade Representative, Commissioner Malmström said to

reporters that “the restrictions enable China to unfairly influence global market prices for essential raw materials, damaging the long-term competitiveness of European industries that depend on them” (Blenkinsop & Martina 2016).

The European Green Deal further served as a bridge between the economic and environmental frames (Durel & Gosselin 2023). Announced in late 2019, the Green Deal establishes that: “Trade policy also needs to ensure undistorted, fair trade and

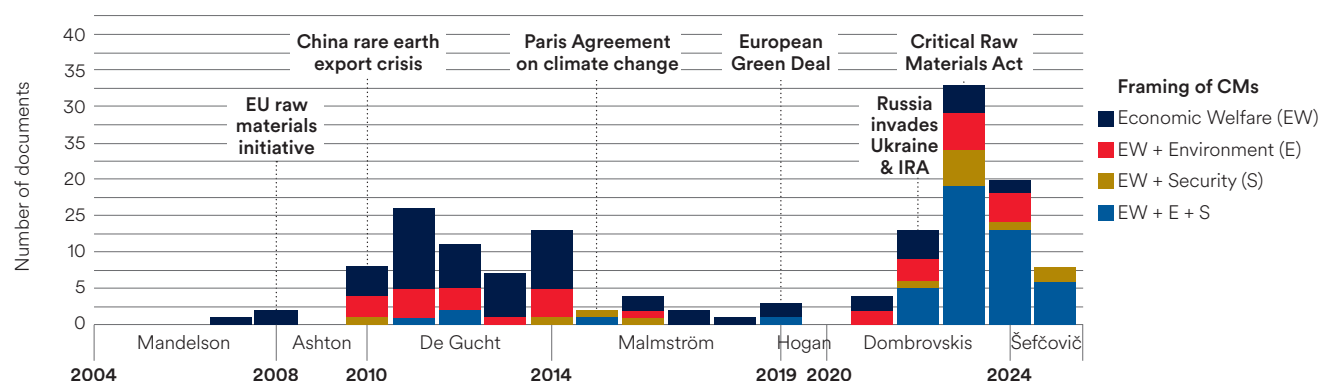
investment in raw materials that the EU economy needs for the green transition.” It also stresses that: “Ensuring the supply of sustainable raw materials, in particular of critical raw materials necessary for clean technologies, digital, space and defence applications, by diversifying supply from both primary and secondary sources, is therefore one of the pre-requisites to make this transition happen,”¹⁸ a security-environment framing rarely reflected in discourse at the time (see Figure 4).

Figure 3. Triple-frame hybridisation (2005–2025)



Note: The figure displays the evolution of hybridisation in EU trade discourse on CMs, measured as the share of DG Trade documents that simultaneously include the economic welfare, environmental protection, and security frames. The blue line represents a 4-year moving average. The dots indicate the raw yearly percentages of triple-framed documents.

Figure 4. Framing of CMs in EU Trade Discourse (2004–2025)



Notes: The figure displays the number of DG Trade discourse documents related to CMs, categorised by economic, environmental, and security frames. For visual clarity, the timeline begins in 2004 (occurrences first register in 2007) and ends in February 2025. The figure depicts three distinct phases: a pre-2010 period marked by low salience dominated by the economic frame (in dark blue); a 2010s phase characterised by the emergence of the environmental and security frames, always in combination with the dominant economic frame; and a post-2020 phase in which all three frames appear frequently and often co-occur, suggesting the rise of hybrid framing (in light blue).

16. EU Press Release, ‘EU challenges China’s rare earth export restrictions’, 13 March 2012, <https://ec.europa.eu/commission/presscorner/detail/en/ip_12_239>.

17. EU Press Release, ‘EU takes legal action against export restrictions on Chinese raw materials’, 19 July 2016, <https://ec.europa.eu/commission/presscorner/detail/en/ip_16_2581>.

18. Communication from the Commission to the European Parliament, the European Council, the Council, the European Economic and Social Committee and the Committee of the Regions, ‘The European Green Deal’, COM(2019) 640 final, 11 December 2019, <https://eur-lex.europa.eu/resource.html?uri=cellar:b828d165-1c22-11ea-8c1f-01aa75ed71a1.0002.02/DOC_1&format=PDF>.

While the Commission increasingly championed environmental protection in its CM discourse, it continued to pursue WTO disputes to maintain access to key raw materials. Notably, in 2019, the EU took legal action against Indonesia's nickel ore export ban. Trade Commissioner Malmström argued that "EU steel producers are under a lot of pressure... the export restrictions imposed by Indonesia put further jobs in the EU's steel industry at risk... we must now act to ensure that international trade rules are respected."¹⁹ The press release does not mention security or environmental aspects, reflecting the persistence of an economic frame even in the lead-up to the Green Deal period.

Phase 3 – Framing reconfiguration (2020–2025)

Phase 3, emerging in the 2020s, is marked by a notable hybridisation of EU trade discourse on CMs. This shift has been driven by major external shocks, especially the COVID-19 pandemic and Russia's invasion of Ukraine in 2022 (Kalantzakos 2020; Crochet & Zhou 2024, pp. 151–152). The sudden shortage of medical supplies at the start of the pandemic, followed by the global semiconductor shortage and wider logistical bottlenecks, revealed important structural weaknesses in international trade systems. In 2025, the Commission's industrial policy lead declared: "We do not want to replace our dependence on fossil fuels with a dependence on raw materials ... Chinese lithium will not be the Russian gas of tomorrow." (Di Sario 2025)

The data on CM discourse reflects this discursive shift: since 2020, the volume of CM-related communications has increased significantly, accompanied by a rise in passages that integrate the three frames (see Figure 3). Whereas in the 2010s, 4.3 percent (10 out of 233) of windows in the dataset combined the economic, environmental, and security frames simultaneously, from 2020 onward, 59.1 percent (220 out of 372) of

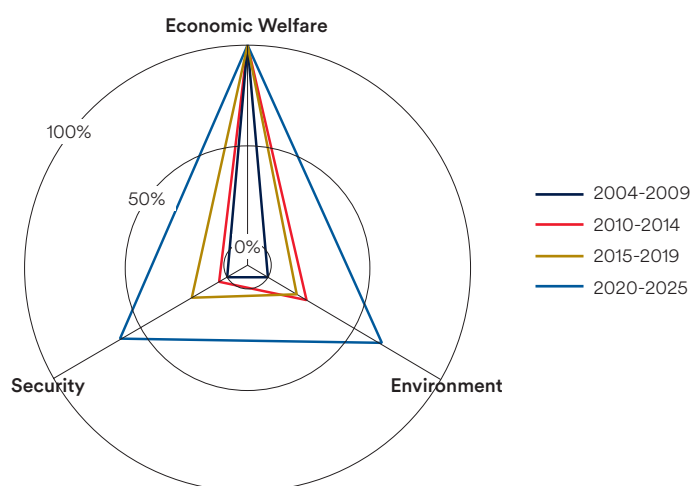
windows exhibit such convergence (see Figure 4). In other words, tri-dimensional framing is now the norm rather than the exception. Interestingly, every CM-related window in the data is associated with the economic frame, underscoring its centrality across all phases of the framing hybridisation process (see Figure 5) and aligning with findings on DG Trade discourse beyond CMs (e.g. Christou & Damro 2024).

A typical post-2020 Commission statement on CMs reads very differently from a decade prior. For example, a March 2023 press release introducing the CRMA pledged to "ensure the EU's access to a secure, diversified, affordable and sustainable supply of critical raw materials."²⁰ The CRMA²¹ aims to reduce the likelihood of disruption in CM supply chains, enhance the EU's capacity to monitor and respond to such risks, and facilitate the free movement of CMs and related products within the Single Market. The regulation defines two key lists: 17 "strategic" raw materials (Annex I) and 34 "critical" raw materials (Annex II). It also

sets concrete supply targets to be met by 2030, including sourcing at least 10 percent of the EU's annual consumption of strategic raw materials through domestic extraction, 40 percent through domestic processing, and 25 percent through recycling. Furthermore, the CRMA mandates diversification of supply, stipulating that no single non-EU country should account for more than 65 percent of the EU's supply of any given material. It also acknowledges that "if not managed properly, increased demand for critical raw materials could lead to negative environmental and social impacts" (paragraph 1).

Recent FTAs are also sold with all frames at once. For instance, the 2023 EU–Chile Interim Agreement was promoted as "boosting competitiveness... for the development of our net-zero economies" while allowing the EU and Chile to "cooperate as like-minded, lasting partners on global challenges, such as the de-risking of supply chains and the fight against climate change."²² Trade Commissioner Maroš Šefčovič (2024–)

Figure 5. Salience of CM Frames in EU Trade Discourse (2004–2025)



Note: The figure shows the relative prominence of the three frames by averaging window-level frame indicators at the document-year level and then across the four time periods. Source: Author.

19. EU Press Release, 'EU launches WTO challenge against Indonesian restrictions on raw materials', 22 November 2019, <https://ec.europa.eu/commission/presscorner/detail/en/ip_19_6319>.

20. EU Press Release, 'Critical Raw Materials: Ensuring secure and sustainable supply chains for EU's green and digital future', 16 March 2023, <https://ec.europa.eu/commission/presscorner/detail/en/ip_23_1661>.

21. Regulation (EU) 2024/1252 of the European Parliament and of the Council establishing a framework for ensuring a secure and sustainable supply of critical raw materials, 11 April 2024, <<https://eur-lex.europa.eu/eli/reg/2024/1252/oj/eng>>.

22. EU Press Release, 'EU–Chile Interim Trade Agreement enters into force', 1 February 2025,

<https://ec.europa.eu/commission/presscorner/detail/en/ip_25_374>. This agreement, like recent FTAs with Mexico, New Zealand, and Kazakhstan, includes a dedicated "energy and raw materials" chapter.

used similarly hybrid messaging when discussing the EU–Mercosur agreement: “It increases our efficiency by enabling the EU to tap into the growth potential of other regions, and by providing access to the inputs that our economy needs to advance on the green and digital transitions, such as critical raw materials” while also praising the deal for enhancing “EU’s economic security, increasing resilience and safeguarding critical imports essential for European industries.”²³ This suggests that the once-separate frames of environmental protection and security have been hybridised with the foundational economic welfare frame.

Trade Commissioner Valdis Dombrovskis (2020–2024) became a vocal narrator of this new reality. In mid- 2023, he declared: “Critical Raw Materials are fundamental for our competitiveness, centred on our goal to be leaders in the green industries of the future... We will create a global Critical Raw Materials Club with reliable partners that are keen to develop their own critical raw materials industries.”²⁴ During the same period, initiatives on CMs proliferated. The Commission initiated negotiations for a CMA with the US.²⁵ Although the prospects for this CMA remain uncertain at the time of writing, particularly considering rising trade tensions with the Trump-led US administration, the Commission’s negotiating directives outline a broad agenda. This included facilitating trade so that CMs extracted or processed in the EU qualify for US clean vehicle credit subsidies, promoting labour rights and high environmental standards in the sector, encouraging circular economy practices, and strengthening sustainable and equitable supply chains through the adoption of common standards and enhanced cooperation with allies and partners. Moreover, in 2022, the US launched the Minerals Security Partnership (MSP), which the EU, Australia, Canada, Estonia, Finland, France, Germany, India, Italy, Japan, Norway, South Korea, Sweden, and the

United Kingdom joined. The MSP aims to promote the rapid expansion of diversified CM supply chains by collaborating with industry and international partners, supporting strategic projects, and fostering investment across the value chain by “reputable” mining companies.²⁶ Two years later, MSP partners announced the launch of the MSP Forum to “serve as a new platform for cooperation in the area of critical raw materials vital for the global green and digital transitions.”²⁷ Between 2021 and 2024, the EU also signed strategic partnerships on sustainable raw materials with 14 countries (see Table 2).

23. ‘Remarks by Commissioner Šefčovič to the European Parliament Committee on International Trade’, 16 January 2025, <https://ec.europa.eu/commission/presscorner/detail/en/speech_25_270>.

24. EU Press Release, ‘Critical Raw Materials: Ensuring secure and sustainable supply chains for EU’s green and digital future’, 16 March 2023, <https://ec.europa.eu/commission/presscorner/detail/en/ip_23_1661>.

25. EU Press Release, ‘EU moves forward with Critical Minerals Agreement negotiations with the US’, 14 June 2023, <https://ec.europa.eu/commission/presscorner/detail/en/ip_23_3214>.

26. US Department of State, ‘Minerals Security Partnership’, <<https://www.state.gov/minerals-security-partnership>>.

27. EU Press Release, ‘EU and international partners agree to expand cooperation on critical raw materials’, 5 April 2024, <https://ec.europa.eu/commission/presscorner/detail/en/ip_24_1807>.

Table 2. List of EU partnerships on CMs.

Partner Countries	Press Releases
Canada	'EU and Canada set up a strategic partnership on raw materials', 21 June 2021, < https://single-market-economy.ec.europa.eu/news/eu-and-canada-set-strategic-partnership-raw-materials-2021-06-21_en >.
Ukraine	'EU and Ukraine kick-start strategic partnership on raw materials', 13 July 2021, < https://enlargement.ec.europa.eu/news/eu-and-ukraine-kick-start-strategic-partnership-raw-materials-2021-07-13_en >.
Kazakhstan	'Strategic Partnership between the European Union and Kazakhstan on sustainable raw materials, batteries and renewable hydrogen value chains', 7 November 2022, < https://single-market-economy.ec.europa.eu/news/strategic-partnership-between-european-union-and-kazakhstan-sustainable-raw-materials-batteries-and-2022-11-08_en#:~:text=On%207%20November%2C%20in%20the%20margins%20of%20COP-27%2C,field%20of%20raw%20materials%2C%20batteries%20and%20renewable%20hydrogen >.
Namibia	'Partnership on sustainable raw materials value chains and renewable hydrogen between the EU and Namibia', 8 November 2022, < https://single-market-economy.ec.europa.eu/news/partnership-sustainable-raw-materials-value-chains-and-renewable-hydrogen-between-eu-and-namibia-2022-11-08_en >.
Argentina	'EU and Argentina step up cooperation on raw materials', 13 June 2023, < https://ec.europa.eu/commission/presscorner/detail/en/ip_23_3217 >.
Chile	'EU and Chile strengthen cooperation on sustainable critical raw materials supply chains', 18 July 2023, < https://ec.europa.eu/commission/presscorner/detail/en/ip_23_3897 >.
DRC	'EU signs strategic partnerships on critical raw materials value chains with DRC and Zambia and advances cooperation with US and other key partners to develop the Lobito Corridor', 26 October 2023, < https://ec.europa.eu/commission/presscorner/detail/en/ip_23_5303 >.
Zambia	'EU signs strategic partnerships on critical raw materials value chains with DRC and Zambia and advances cooperation with US and other key partners to develop the Lobito Corridor', 26 October 2023, < https://ec.europa.eu/commission/presscorner/detail/en/ip_23_5303 >.
Greenland	'EU and Greenland sign strategic partnership on sustainable raw materials value chains', 30 November 2023, < https://ec.europa.eu/commission/presscorner/detail/en/ip_23_6166 >.
Rwanda	'EU and Rwanda sign a Memorandum of Understanding on Sustainable Raw Materials Value Chains', 19 February 2024, < https://ec.europa.eu/commission/presscorner/detail/en/ip_24_822 >.
Norway	'EU and Norway sign strategic partnership on sustainable land-based raw materials and battery value chains', 21 March 2024, < https://ec.europa.eu/commission/presscorner/detail/en/ip_24_1654 >.
Uzbekistan	'EU establishes strategic partnership with Uzbekistan on critical raw materials', 5 April 2024, < https://ec.europa.eu/commission/presscorner/detail/en/ip_24_1806 >.
Australia	'EU and Australia sign partnership on sustainable critical and strategic minerals', 28 May 2024, < https://ec.europa.eu/commission/presscorner/detail/en/ip_24_2904 >.
Serbia	'EU and Serbia sign strategic partnership on sustainable raw materials, battery value chains and electric vehicles', 19 July 2024, < https://ec.europa.eu/commission/presscorner/detail/en/ip_24_3922 >.

Source: European Commission, Raw materials diplomacy, <https://single-market-economy.ec.europa.eu/sectors/raw-materials/areas-specific-interest/raw-materials-diplomacy_en>.

5. Discussion and conclusion

The case of CMs exemplifies how the EU's discourse on CMs has gradually become hybridised, although sometimes in a cosmetic manner. It also demonstrates the Commission's role as an active ideational entrepreneur. As conventional FTAs increasingly struggled to find political acceptability, the Commission advanced an alternative, hybrid framing of trade policy aimed at reconciling economic growth with environmental protection and security imperatives. These findings contribute to research on the EU's geopolitical turn by demonstrating its concrete impact on EU discourse. They also align with earlier studies observing discourse continuity (e.g. De Ville & Orbie 2014; Drieghe & Potjomkina 2019; Young 2019; Eliasson & García-Durán 2023), showing that the new economy-environment-security hybrid builds on, rather than breaks from, earlier framings. Moreover, they speak to the trade governance and ideational change literatures by illustrating processes of framing hybridisation.

While this paper is primarily descriptive and does not seek to provide a thorough explanation of the hybridisation of EU trade discourse on CMs, several potential drivers beyond the identified trigger events can nevertheless be considered. The EU discourse on CMs has likely been shaped by its negotiations with, and policy learning from, external partners. The 14 strategic partnerships listed in Table 2 have enabled the Commission to engage with a diverse set of priorities across six continents, fostering convergence on shared concerns. In parallel, unilateral initiatives by key partner countries appear to have generated learning effects within the EU. For example, the US's use of industrial policy tools—especially the 2022 IRA, which tied clean energy tax credits to the use of CMs sourced domestically or from free trade partners—spurred the EU to respond to protect its electric vehicle industry. Similarly, Canada, a close EU trade and CM partner, launched its national CMs strategy in 2022, before the CRMA, as well as the

Sustainable Critical Minerals Alliance with Australia, France, Germany, Japan, the United Kingdom, and the US in 2022 to “drive the global uptake of environmentally sustainable and socially inclusive and responsible mining, processing and recycling practices and responsible critical minerals supply chains.”²⁸

Beyond potential drivers, certain challenges associated with framing CMs must also be acknowledged. Framing success “does not follow automatically from a convincing selection of problems, causes, and solutions (while ignoring others), but these need to be narrated persuasively” (De Ville & Gheyle 2021, p. 556; see also Finnemore & Sikkink 1998; Payne 2001). In the case of the EU's CM discourse, significant tensions and trade-offs between the competing dimensions of the trilemma persist. For instance, Leonelli (2025, p. 245) argues that a security-centred trade policy discourse can undermine decarbonisation efforts, as it “translates into an inward-looking, adversarial, and short-term approach.” Similarly, the notion of “open strategic autonomy” may be viewed as paradoxical, seeking to reconcile the liberal principle of openness with the strategic imperative of control (e.g. Schmitz & Seidl 2023). Critics have pointed to the potential contradictions embedded in this narrative: How can the EU advocate for open markets while subsidising domestic industries and securing privileged access to CMs? Some analysts argue that this emerging notion reflects two opposing influences within EU institutions: “neomercantilist-protectionist” tendencies found in the Council and DG for Internal Market, Industry, Entrepreneurship and Small and Medium Enterprises on the one hand; and “neoliberal, free-market” perspectives prevalent in DG Trade on the other hand (Gehrke 2022; Baroncelli & Ülgen 2024, p. 31). Others have underscored the risk that “EU efforts to link different policy areas may expose it to criticism of double standards and of undermining the liberal norms that may be so central to its identity and ability to

exercise power” (Herranz-Surrallés, Damro & Eckert 2024, pp. 930–931).

More broadly, growing contestation of the EU's CM strategy may weaken the credibility and legitimacy of the hybrid framing (e.g. Crochet & Zhou 2024, p. 164). For instance, as a lithium mining project developed by Rio Tinto stirred local backlash over environmental protection in Serbia, Weizman & Ahmatović (2025) asked if the country is “turning into an EU mining colony,” drawing attention to the risk of resource-rich countries being reduced to instrumental roles in Europe's supply strategy. Similar critiques have emerged from civil society organisations. A report by SOMO argues that the EU's strategy leans on “unequal trade agreements with resource-rich countries in the Global South, perpetuating a neocolonial dynamic” (González & Verbeek 2024). The EU's CM partnership with Rwanda has also faced scrutiny. Zimmermann (2024) contends that the agreement risks legitimising the continued extraction and export of conflict minerals from eastern DRC, particularly given allegations of Rwanda's involvement in the region's instability through its support of the M23 insurgency. Further ethical concerns have been raised by Global Witness regarding the EU's partnerships with Australia, Argentina, Uzbekistan, and the DRC, citing issues ranging from Indigenous rights violations and environmental degradation to labour repression and corruption (Stewart 2024). Ultimately, the credibility of the emerging hybrid framing will depend on whether it is backed by concrete action. Ensuring that initiatives like a “critical raw materials club” benefit all parties, for example, by investing in partners' capacities rather than only extracting resources, will be crucial to building the new framing's legitimacy (Fern 2023). In this regard, the label “critical raw materials” itself may reinforce perceptions of extractivism.

Looking ahead, several avenues for future research emerge. First, it would be valuable to investigate whether

28. Natural Resources Canada, ‘Countries commit to the sustainable development and sourcing of critical minerals’, 12 December 2022, <<https://www.canada.ca/en/natural-resources-canada/news/2022/12/countries-commit-to-the-sustainable-development-and-sourcing-of-critical-minerals.html>>.

similar framing hybridisation occurs in other EU policy areas. Beaumier, Papin & Morin (2023), for instance, show how new institutions are created in data privacy, climate governance, and investment protection by combining pre-existing institutions. In the realm of trade discourse, relevant domains may include digital and technology policy, with the emergence of the discourse around digital sovereignty, or public health policy, following the development of the European Health Union in the aftermath of COVID-19. Comparative studies could test the generalisability of the framing hybridisation concept and further uncover how the Commission manages multiple frames in parallel.

Future research could also assess the extent of the Commission's ideational power (Carstensen & Schmidt 2016)—its capacity to influence the normative and cognitive beliefs of Member States, industry actors, and civil society regarding CM governance. Do national governments and stakeholders adopt the new hybrid framing, or do they engage in “norm contestation” (Bloomfield 2015; Stimmer 2019)? And if they do contest it, is their opposition directed at a single frame or multiple ones? Tracing the hybrid framing's circulation in parliaments, the media, and international forums would clarify its resonance and limits beyond Brussels.

It is also important to assess the relationship between discursive shifts and policy outcomes. Did the rhetorical change pave the way for or run ahead of substantive policy developments? The findings of this study suggest that changes in DG Trade discourse generally follow the adoption of major strategies or instruments, such as the RMI, the CRMA, or the *Open, Sustainable and Assertive Trade Policy*. This sequencing challenges core expectations of DI, which typically posits that discourse is a driver of policy change. A more systematic comparison of the EU's discourse with its enacted trade measures could help clarify the extent to which rhetoric and policy are aligned, and where discrepancies remain.

Finally, the presence of CMs in the EU's trade discourse is still at an early stage. The hybrid framing at the time of writing is thus likely to face “prolonged instability” (Gosselin, Durel & Morin 2025) and continue to evolve significantly. Deeper geopolitical fragmentation, renewed supply-chain weaponisation, severe climate disruptions, or major technological breakthroughs, such as in energy storage, are likely to push alternative frames to the fore or alter the relationship between the existing frames surrounding CMs. Considering current trends, such as the projected exponential growth in global demand, the conclusion of new CMAs (e.g. the US–Ukraine deal in May 2025), the EU's continued import dependence, and the increasingly assertive positions adopted by producer countries, CMs will probably remain a prominent and contested issue in trade governance in the years to come. For instance, in April 2025, China, the EU's sole supplier of heavy rare earth elements, introduced new export licensing requirements (Baskaran & Schwartz 2025).

Although some authors argue that China's CM strategies are mainly aimed at “addressing internal challenges and policy priorities in China rather than dominating, weaponizing, or causing disruptions in global supply” (Zhou, Crochet & Wang 2025; see also Wübbecke 2013), this has further reinforced in Brussels a narrative of “strategic competition” and confirmed the EU's “strong incentive” to reach a CMA with the US (Licandro 2025). African resource exporters are also expected to continue to reshape EU trade thinking (and speaking). Governments in countries such as the DRC, Ghana, Namibia,

Rwanda, Zambia, Zimbabwe, and others have implemented export restrictions and local content requirements on CMs. These measures typically oblige companies to employ local labour, use domestically sourced inputs in mineral processing, and ensure partial ownership by local stakeholders or government entities. Such policies often aim to foster domestic value addition, promote economic development, and increase national control over resource governance (Nickerson & Geipel 2019; Briel 2024). The EU has expressed concerns about such trade restrictions, advancing an economic frame by arguing that they may be inconsistent with existing bilateral trade agreements and potentially breach WTO rules (Harrisberg, Adebayo & Gill 2023). Future research will therefore need to adopt longer-term, longitudinal approaches to fully capture the evolution of this discourse, including potential reversions to Phase 2, and to extend the analysis beyond the EU context.



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