



The Critical Raw Materials Act

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Executive Summary

The Critical Raw Materials Act (CRMA) aims to secure the supply of critical raw materials to the European Union. By 2030, 10 percent of Europe's consumption of critical raw materials is to be covered by domestic extraction, 40 percent by domestic processing and 15 percent by recycling. The European Commission expects demand for raw materials for green technologies, the digital industry, aerospace and defence to rise sharply in the coming decades. High increases in consumption are taken for granted and the questions of what raw materials are used for and to what extent are not viewed as a political issue. The CRMA therefore focuses one-sidedly on securing the largest possible raw volumes and fails to take into account the need to reduce consumption. As a result, the Commission's draft does not adequately address the problems of global scarcity of raw materials, their fair distribution and efficient use.

We welcome the planned reinforcement of European capacity in mining and processing in general, but the legal framework of the strategic projects envisaged for this raises problems. The simplified approval procedure, limited to one or two years, risks undermining environmental regulations, social sustainability standards, local community involvement and public participation. Swift approval procedures require strategic projects to be more precisely defined and for greater differentiation between such projects.

While environmental rules have so far mainly been issued in the form of directives, the present legal act is to be issued in the form of a regulation. That results in numerous legal uncertainties. In addition, Member States no longer have the option of coordinating requirements under EU law with national legislation. AK therefore takes the view that the details of strategic projects must be enacted in the form of a directive. Further legal disputes can also be expected due to the fact that the entire initiative is based on internal market competence, while EU environmental rules are based on environmental competence.

With regard to recycling, separate collection and reuse, the European Commission should likewise present requirements in the form of directives instead of merely delegating this task to the Member States. AK also calls for trade unions and civil society to be structurally involved in the work of the Critical Raw Materials Board.

The fact that strategic projects may only be recognised if they are implemented sustainably is to be welcomed. However, the requirements urgently need to be tightened so that all project promoters must comply with the EU Corporate Sustainability Due Diligence Directive – including small and medium-sized enterprises, which are otherwise exempt. AK also calls for removal of the possibility to submit certification as an alternative to compliance with legislation or international instruments such as the EU Supply Chain Directive and the OECD Guidelines for Multinational Enterprises.

EU raw materials policy must not discourage countries in the Global South from developing their own processing and industries. The European Commission's plan to crack down on export restrictions and own-processing targets by resource-rich countries is therefore highly problematic. AK once again speaks out against old-style trade agreements that entrench unequal and unsustainable trade and production structures. The transformation to a climate-neutral society must not be used as an excuse to continue pursuing a neoliberal EU trade policy.

AK's position

1. The Critical Raw Materials Act (CRMA)

The Critical Raw Materials Act (CRMA) aims to safeguard the supply of critical raw materials to the European Union. Critical raw materials are defined by their central importance for European value creation and are subject to high supply risks. In addition, the CRMA defines sixteen strategic raw materials that are also significant for strategic fields such as renewable energy, digitalisation, aerospace and defence, and where the expected growth in consumption is high compared to current production.

List of critical and strategic raw materials

Aluminium/ Bauxite	Coke	Lithium	Phosphorus
Antimony	Feldspar	Light rare earth elements*	Scandium
Arsenic	Fluorite	Magnesium	Silicon metals
Barytes	Gallium	Manganese	Strontium
Beryllium	Germanium	Natural graphite	Tantalum
Bismuth	Hafnium	Niobium	Titanium metal
Boron/Borate	Helium	Platinum group metals	Tungsten
Cobalt	Heavy rare earth elements*	Phosphorite	Vanadium
		Copper	Nickel

* rare earth elements for permanent magnets are considered strategic raw materials

The CRMA includes measures to strengthen mining and value creation in Europe, diversify international supply chains and secure access to raw materials for European industry. As a target, the European Commission proposes that by 2030, 10 percent of Europe's consumption of critical raw materials should be met by the EU's own extraction within the Union, 40 percent by its own processing and 15 percent by recycling. In order to expand mining and processing within the Union, steps are to include the definition of strategic projects, which will benefit from shortened approval procedures and facilitated financing.

The initiative consists of a regulation and a communication. The regulation is intended to provide the legal framework for strengthening domestic capacity in mining, processing and the circular economy. The Communication includes measures vis-à-vis resource-rich third countries.

2. Where the CRMA falls massively short: reducing the consumption of raw materials

In AK's opinion, the strong focus of the CRMA on securing access to raw materials fails to give due attention to the problems of global scarcity of raw materials, their fair distribution and efficient use. Apart from the initiatives on recycling and the circular economy, which still need to be bolstered (see below), the European Commission's draft completely lacks the dimension of reducing consumption. If – as proposed by the Commission – raw material sources are diversified without implementing measures to reduce consumption, the legislation will exacerbate competition for raw materials, environmental crises and labour-related risks instead of helping to solve them.

The European Union consumes 25-30 percent of the metals produced worldwide, but is home to only 6 percent of the population. If European consumption of raw materials continues to grow unchecked, the excessive appropriation of resources will be further exacerbated – and with it global competition for raw materials. That risks exacerbating the devastating effects of mining on workers, the local population and nature. Mining is one of the industries with the most

exploitative and health-hazardous working conditions. Wages are low and occupational safety is usually poor, resulting in many accidents, such as contact with toxic chemicals or mining accidents. Around one-third of business-related human rights violations recorded worldwide occur in the mining sector.

In addition, the extraction of raw materials is associated with massive interference with nature and negative effects on the local population. Mining is water-intensive and requires toxic chemicals in some cases; it can therefore endanger the drinking water supply of the local population. In addition, approx. [10 percent of all greenhouse gas emissions today are caused by the primary extraction of metals and minerals](#). If mining is increased, the CO₂ balance will deteriorate still further. Illegal deforestation is also a widespread problem in the context of mining, for example for the construction of mining infrastructure and energy supply; indigenous population groups are also repeatedly deprived of their habitat in the process. Due to the often catastrophic after-effects of mining, it is essential to keep European and global consumption of raw materials as low as possible.

In the view of AK, the focus of European policy on raw materials must therefore be on an absolute reduction in the consumption of raw materials. How European societies develop and for what raw materials and energy are used are questions of democratic decision-making and design. Instead of acknowledging this, the European Commission takes high consumption increases for granted in the CRMA. For example, it refers exclusively to the “high-demand” scenario of the underlying [Foresight Study](#) and alternative development options that lead to lower consumption are not included. However, in order to safeguard quality of life in the long term, European raw materials policy must not focus on the procurement of maximum quantities. Instead, it must focus on measures to improve energy and material efficiency and product lifetimes, and to transform resource-intensive areas of life and economic sectors, such as mobility. On a finite planet, the demand for resources cannot increase endlessly and the social and environmental costs of the European energy transition must not be passed on to the population and workers of other countries.

Moreover, shortages or interruptions in the supply of strategic raw materials could lead to raw material bottlenecks in the foreseeable future. AK is therefore calling for an EU crisis plan which gives priority to fields benefiting the general public in the event of any raw material bottlenecks. That includes, for example, the expansion of renewable energy infrastructure and public transport.

3. Strategic projects in the European Union

3.1. Precarious legal framework for strategic projects

The CRMA envisions that 10 percent of Europe’s consumption of critical raw materials will be met by mining within the Union by 2030. The central instrument for strengthening European mining and processing is that of “strategic projects”, whose implementation is to be facilitated by special conditions. Approval procedures are to be greatly shortened and simplified, and projects are also to receive assistance to obtain funding.

The strengthening of European capacity in mining and processing is fundamentally welcome, but touches on highly sensitive areas. If the maximum duration of approval procedures for strategic projects is limited to one (for processing) or two years (for mining), as proposed by the Commission, there is a risk of important environmental protections, social sustainability standards, local community involvement and public participation being undermined. It is positive in principle that the CRMA addresses many elements that can be used to expedite approval procedures.

A much more nuanced, but also more specific definition of strategic projects appears to be pivotal here. The projects covered under the proposed definition are extremely diverse and may involve highly heterogeneous (environmental) impacts. It does not make sense to provide a single procedure for all facilities potentially covered by the CRMA. In some cases, this could even prolong procedures and involve difficult questions of jurisdiction. The wide-ranging benefits for strategic projects could lead to a large number of project applicants seeking such status. Given the extremely vague definition of such projects, this will raise numerous questions in practice about which projects qualify as strategic projects. It would seem to be more expedient to at least differentiate to some extent between facilities and to list the possible project types in an annex, as is also the case in the Environmental Impact Assessment Directive. The approval procedures should be designed to reflect those differences or the facilities should be treated in the scope of existing approval regimes. Overall, the proposed new procedural regime adds another type of approval procedure to the numerous existing ones. This diversity is already a major problem in practice, and the introduction of new procedural regimes would exacerbate this.

The Commission’s responsibility for deciding what constitutes a strategic project is also problematic because such projects require the acceptance of the local population. The Austrian Location Development Act has been heavily criticised for a similar approach that does not even include consultation with the affected region

or civil society. Due to the numerous concerns under constitutional law and Union law, this approach has never been used in Austria. It is also not to be expected that the necessary acceptance can be achieved by way of an opinion of the Member State (pursuant to Article 6(5) of the proposal).

Strong acceleration, in particular through tight procedural deadlines (e.g.: Articles 10 and 11(3) of the proposal), also carries the risk that the quality of the procedures and the applicable standards cannot be maintained. Such a development must be prevented at all costs. Nor should the public's participation rights be curtailed by shorter procedures. It can be assumed that the overriding public interest envisaged for strategic projects in Article 9(2) of the proposal will lead to numerous conflicts within the scope of the specific approval procedures, which will delay rather than accelerate the procedures.

It should be emphasised here the availability of sufficient financial and human resources for the authorities is a far more effective approach to speed up procedures. The corresponding provision in the CRMA and administrative acceleration through reinforced capacity (including monitoring) are therefore expressly welcome. The assumed approval provided for in Article 10(4) of the Commission draft stipulates that strategic projects in processing and recycling where the shortened deadlines are not met by the authorities are automatically deemed to have been approved. This must be explicitly rejected. Such assumed approval leads to major legal uncertainties, is likely to be highly problematic in terms of primary law and, in particular, is in conflict with provisions of the Charter of Fundamental Rights. Obviously, this would undermine any rights of participation in procedures that Article 13 of the proposal is intended to guarantee. Also unresolved is the question of how authorities should then establish the necessary conditions for implementation of the project. Here too, experiences in Austria are instructive: The first draft for the Location Development Act contained a similar mechanism; the numerous legal concerns then led the federal government to refrain from that plan. Above all, it should not be forgotten that strategic projects must also strive to gain the necessary acceptance from the public; that may be rendered futile by undermining participation rights.

The proposal stipulates that strategic projects should also be taken into account in spatial planning, for example when new zoning plans are enacted. In Austria, this is likely to be mainly the responsibility of the federal government within the scope of its specialised planning competencies. At present, however, the necessary legal bases for such planning are lacking in the special administrative laws that would probably be affected by

the CRMA (Mineral Resources Act, Waste Management Act etc.).

3.2. Excursus: A uniform EU regulation based on internal market competence does not make sense

Numerous legal uncertainties, which are not yet evident, will also be created by the fact that this initiative is being carried out by means of an EU regulation, whereas environmental rules have so far been issued mainly in the form of directives. That removes the possibility for Member States to harmonise the requirements with existing national legislation. It is hardly to be expected that the administrative authorities will be able to cope with the resulting enforcement problems on their own. Given the above, AK is of the opinion that essential parts of Chapter 3 on the details of strategic projects would have to be enacted in the form of a directive simply by virtue of their regulatory requirements.

It is also problematic that the entire initiative concerning strategic projects is to be uniformly based on internal market competence. Virtually all of the EU environmental legislation applicable to the approval of proposed projects is based, with good reason, on environmental competence. The coexistence of new regulations based on internal market competence and existing environmental regulations based on environmental competence will lead to legal disputes over which national legal regulations can no longer be applied to the strategic projects. Aside from that, it is not clear why the requirements of this initiative related to environmental protection are not based on environmental competence. In addition, many of the sensitive questions that will become apparent during implementation in the Member States are neither evident nor answerable at this point in time.

3.3. Strategic public ownership and social conditions for the allocation of funding

The CRMA also largely ignores the issue of ownership. As AK has already stated in its [Statement on the Green Deal Industrial Plan](#), companies that are central to European value chains must not come under the control of third countries. Even in the case of critical raw materials, the public sector must be able to prevent the sell-off of a strategically important company at any time with effective investment controls and ensure full transparency in the review of problematic acquisition processes. In addition, strategic public ownership, for example through state equity funds or at least in the form of "golden shares", is an important instrument for strengthening European value creation in the mining, processing and recycling sectors.

In order to increase value creation in the EU, more specific and binding requirements are also needed for the allocation of subsidies and for public tenders. While no new sources of funding will be made available for strategic projects, under the draft regulation they will receive support from the CRM Board for funding from private investors and national and European funding programmes. In addition to compliance with stricter sustainability requirements (see below), AK believes that all subsidies must be linked to the fulfilment of social conditions, for example through job guarantees, training measures, a strengthening of the works council and a ban on dividend and bonus payments. Companies with unfair practices, in particular tax avoidance, tax evasion and aggressive tax planning or violations of labour or social law provisions, must be excluded from subsidies.

3.4. Sustainability requirements for strategic projects

Under Article 5(1)(c), recognition as a strategic project is subject to the condition that the project is implemented in a sustainable manner in accordance with the criteria in Annex III. Project promoters or companies must provide evidence of their fulfilment and submit corresponding documents in the application (Article 6(1)(a)). Annex III contains certain EU legislation and international instruments such as the EU Supply Chain Directive and the OECD Guidelines for Multinational Enterprises that are taken into account. Alternatively, there is the possibility to demonstrate certification according to a “recognised scheme” (recognition according to Article 29 of the proposed regulation) or efforts to obtain such a scheme.

AK welcomes the fact that recognition as a strategic project may only be granted if the project is implemented in a sustainable manner. The explicit inclusion of social partners in Article 5(1)(c) is particularly positive. In the view of AK, however, the requirements for sustainable project implementation urgently need to be tightened.

AK demands that all companies or project promoters applying for recognition as a strategic project must comply with the EU Corporate Sustainability Due Diligence Directive – even those companies or project promoters that are not normally covered by the scope of the EU Corporate Sustainability Due Diligence Directive. This must be explicitly stated in Article 5(1)(c) (not in Annex III, as this can be amended under Article 5(2)). According to the proposed regulation, compliance with the EU Corporate Sustainability Due Diligence Directive (CSDDD) is a criterion “only if applicable to the project promoter”. In AK’s view, this is insufficient, as recognition as a strategic project entails far-reaching legal consequences and extraordinary benefits for

companies. Only large companies are covered by the EU Corporate Sustainability Due Diligence Directive, but smaller companies can also act as promoters of strategic projects. Since the benefits that are to be enjoyed by strategic projects are not linked to the size of the company, a distinction should not apply to sustainability requirements either. In addition, strategic projects can also be implemented in third countries. Among the critical and strategic raw materials are some that regularly feature in reports on human rights abuses and environmental damage, such as silicon (forced labour in China) and cobalt (child labour in the DR Congo). Due to these existing problems, recognition as a “strategic project” should only be granted in the event of compliance with the EU Corporate Sustainability Due Diligence Directive, regardless of the size of the company.

AK also calls for removal of the possibility to submit certification (or seek it) as an alternative to compliance with the EU Corporate Sustainability Due Diligence Directive and other EU legislation or international instruments, as provided for in Annex III. Certification can be presented additionally, but cannot replace proof of compliance with the EU Corporate Sustainability Due Diligence Directive.

Furthermore, under Article 29(1), governments or organisations that have developed and supervise certification schemes for the sustainability of critical raw materials may have their schemes recognised by the Commission. Annex IV contains the relevant criteria for recognition. In AK’s view, certification can in no way replace compliance with mandatory due diligence requirements under the EU Corporate Sustainability Due Diligence Directive and monitoring of such compliance by the authorities. However, certification recognised by the European Commission is a step forward compared to certification that is managed purely by the private sector, since the latter is often ineffective and in many cases has failed to prevent human rights violations and environmental damage in the past. However, Annex IV lacks quality requirements for auditors and certifiers. [Studies](#) show that certification is often awarded despite poorly conducted audits. The Conflict Minerals Regulation is a case in point. To date, the Commission has not recognised any certification system in this context; there are only purely private-sector initiatives. While these are evidence of increasing public pressure on companies, it is questionable whether and to what extent the criteria set by an umbrella association of companies, which thus de facto control themselves, will lead to substantial improvements in mining conditions.

3.5. Recycling and the circular economy

In addition to the high consumption of raw materials in the EU compared to other countries, raw materials are also mostly used inefficiently due to the lack of durability and reparability of products and the low recycling rates of primary raw materials. It is therefore also necessary to substitute raw materials, to produce products that are longer lasting and repairable, and to increase the reuse of raw materials that have already been extracted. The goal of sourcing 15 percent of critical raw materials from recycling by 2030 is a good step, but it is not ambitious enough. More important than the overarching target are specific and binding recycling targets for the individual raw materials; in some cases (e.g. for copper and tungsten) these need to be significantly higher due to the already existing recycling ratio.

The development of a European circular economy can reduce strategic dependencies and help to reduce the consumption of raw materials. However, a recycling rate of 100 percent is not physically possible; moreover, raw materials are often bound in products for long periods of time and are therefore not available for recycling. These problems of raw material consumption cannot be adequately addressed by conventional circular economy measures. The main problem is the overall turnover of materials and the associated environmental impact. Circularity is of limited help given the “planetary boundaries”; circularity rates (rates of use of reusable materials) today are very modest.

As with strategic projects, there is legal ambiguity regarding Article 25 on national measures to promote circularity. The article predominantly represents a broad mandate for Member States to take measures to improve separate collection, promote reuse and step up the use of secondary materials. However, a regulation must set out legal provisions that are sufficiently clear that they can be enforced without further legal transposition in the Member States. After all, the Member States are not only supposed to make plans, but also to take the necessary measures. If these are to go beyond voluntary measures, appropriate EU-wide legislation will be needed. The leeway available in the regulation raises fears that Member States will show little ambition, because they are aware of practical conflicts due to experiences with other waste streams. Given the above, AK advocates that critical raw materials be considered as a separate waste stream, regulated by an EU directive based on the environmental chapter of the TFEU, following the example of comparable legal acts.

Overall, AK calls for the European Commission to focus in a mission-oriented way on funding research

and development, piloting and market scaling in the fields of resource efficiency, recycling and substitution of critical raw materials. The Horizon programme, for example, could be used for this purpose. To increase resource efficiency and energy efficiency and reinforce reparability, appropriate conditions are needed for the allocation of subsidies. In addition, subsidies must be linked to training and qualification goals in order to expand and strengthen the relevant expertise of the workforce in Europe. #

The development of a European circular economy requires an accompanying labour market and education policy. Specifically, this requires above all:

- Analysis of the shift in and potential for new value chains in the circular economy and accompanying training/qualification plans.
- Appropriate funding of labour market policy measures in green structural change (including targeted training drives, such as in the case of the Austrian Environmental Foundation).
- Further development and upgrading of apprenticeship training in the circular economy.
- Establishment of adequate qualification and further training programmes as well as the enshrinement of a right to these accompanied by suitable income security.

3.6. Governance and monitoring

For the governance of projects related to critical raw materials, the draft regulation provides for a Critical Raw Materials Board, which will be composed of the European Commission and the Member States. The Board is to oversee strategic projects and their financing, monitor and manage risk and advise on strategic partnerships. The Board may involve stakeholders, but trade unions are not explicitly mentioned in the draft regulation. AK, however, calls for trade unions and civil society to be involved on an ongoing and structural basis in this field, given how sensitive it is in terms of labour and human rights as well as environmental risks; they must therefore be permanently represented on the CRM Board. In addition, the Board is to establish a separate subgroup on sustainability (social and environmental) in the field of procurement. In the field of risk management, the topic of climate change impacts is to be incorporated into decisions.

AK views the planned monitoring of inventories and supply chains of critical raw materials and the establishment of a public database as positive steps. Reporting and stockpiling must be mandatory for

companies that depend on critical raw materials. Member States should also conduct regular analyses of the strategic interdependencies of their economies along key value chains. The list of critical raw materials and components should be updated annually and the monitoring should include recycling. Beyond monitoring, it should also be possible for the EU to set specific storage quotas for critical raw materials, as is currently the case for gas.

4. Cooperation with resource-rich third countries

4.1. Local value creation and trade agreements

Even if European mining and the circular economy are reinforced, the European Union will remain dependent on resource-rich third countries for its supply of raw materials. The European Commission wants to greatly expand relations with them. AK welcomes the repeatedly stated goal of contributing to create added value in countries rich in raw materials. However, it is at odds with the European Commission's specific plan to crack down on export restrictions and own-processing targets of resource-rich countries. EU raw materials policy must not discourage countries in the Global South from developing their own processing and industries, thus keeping them in a purely supplier role. Tariffs and other protective instruments should be recognised as effective means to this end. Nor must the EU's 40 percent own-processing target come at the expense of poorer, resource-rich countries.

To secure raw materials, the European Commission intends to use existing trade agreements and conclude new ones along the same lines. However, old-style EU trade agreements will not solve the problems of the scarcity of raw materials, their fair distribution and efficient use. This is also made clear by the planned trade agreement with Chile, which is cited as a model by the European Commission, particularly with regard to raw materials. It contains a separate chapter on matters concerning energy and raw materials, including prohibitions on export and import monopolies for raw materials. If the agreement enters into force, Chile will no longer be allowed to impose export restrictions on the EU and will have to end its current preferential treatment of locally based companies. Since it makes it more difficult for the country to build up its own industry, the agreement with Chile cannot be regarded as a model. AK once again wishes to speak out against old-style trade agreements that entrench unequal and unsustainable trade and production structures. The transformation to a climate-neutral society must not be used as a pretext to continue pursuing a neoliberal EU trade policy that takes insufficient account of social and environmental risks and further fuels the climate crisis.

4.2. Mining conditions and transport

Instead, the EU should conclude green deal agreements with trading partners that grant them development opportunities. The local population must be given a say in decisions on new or expanded mining areas. The extraction of those raw materials that will continue to be needed in the future must be carried out in compliance with human rights, international labour standards and strict environmental standards. Mandatory and transparent presentation of the ecological footprint as well as binding compliance with ILO standards and labour and social standards in line with human rights in the extraction, procurement and use of critical raw materials must also be provided for. With regard to the role of export subsidies for raw material projects in third countries, AK wishes to point out that these must also be in line with the objectives in the fields of employment policy, environmental policy, human rights and development policy.

The European Union must also ensure that all criteria relating to human rights, international labour standards and environmental standards are observed in the transport of critical raw materials. However, the logistics sector is hardly taken into account in the current draft, so the provisions need to be tightened here.

4.3. Global raw materials agreement instead of a plethora of non-transparent measures

Beyond trade agreements, the European Commission cites a variety of international projects such as Strategic Partnerships, a Critical Raw Materials Club, use of the Global Gateway Initiative and the possibility of strategic projects in third countries. The respective objectives, conditions and links between these projects are not yet known. Due to the abundance of envisaged measures, which have not yet been more closely linked to one another, there is a risk of lack of transparency, differing standards and ultimately ineffectiveness. As raw material issues affect all countries in the world and there is a global rush for the coveted raw materials, the EU must advocate at international level for negotiations on a legally binding global raw materials agreement based on the SDGs. This must not only include clear reduction paths for consumption, but also provide targets for the globally equitable distribution of raw materials and their efficient use.



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About Us

The Austrian Federal Chamber of Labour (AK) is by law representing the interests of about 3.8 million employees and consumers in Austria. It acts for the interests of its members in fields of social-, educational-, economical-, and consumer issues both on the national and on the EU-level in Brussels. Furthermore, the Austrian Federal Chamber of Labour is a part of the Austrian social partnership. The Austrian Federal Chamber of Labour is registered at the EU Transparency Register under the number 23869471911-54.

The main objectives of the 1991 established AK EUROPA Office in Brussels are the representation of AK vis-à-vis the European Institutions and interest groups, the monitoring of EU policies and to transfer relevant Information from Brussels to Austria, as well as to lobby the in Austria developed expertise and positions of the Austrian Federal Chamber of Labour in Brussels