

(English version)

**Question for written answer E-002169/26
to the Commission
Catarina Martins (The Left)
(27 May 2026)**

Subject: Portugal's possible objection to the San Juan mine (in A Gudiña, Galicia) strategic project under the Critical Raw Materials Act

The San Juan open-pit wolfram mine project in A Gudiña, Galicia, is located just 2 km away from the Portuguese border. It poses a direct threat to the ecosystem of the Montesinho Natural Park and the water resources of the River Rabaçal, the drainage basin of which is shared and is used for public water supply in Portugal.

The project promoter recently submitted an application to the Commission for the project to be recognised as a 'strategic project' under the Critical Raw Materials Act.

Article 7(8) of the act provides that a project cannot be considered for recognition as strategic if a substantiated objection is lodged by a Member State whose territory is concerned by that proposed project.

Given the serious cross-border environmental impact and the risk to the environment and public health for people living in the north of Portugal:

1. Has the Commission notified Portugal of this request to classify the San Juan mine as a strategic European project? If so, when?
2. Has Portugal formally raised any objection with the Commission concerning the application for this mining project? If so, what grounds did it give and what is the immediate impact on the Commission's assessment of the application for the project to be recognised as strategic?
3. If the Commission has not yet received any formal objection, what is the deadline for Portugal to exercise its right to veto in this specific case?

Submitted: 27.5.2026

**Answer given by Executive Vice-President Séjourné on behalf of the European Commission
(6 July 2026)**

The second selection round of Strategic Projects under the Critical Raw Materials Act ⁽¹⁾ (CRMA) is ongoing. The Commission cannot comment on whether projects have applied and cannot prejudge possible outcomes of the assessment.

In alignment with Article 7 of the CRMA, the Commission transmitted complete applications to the Member States in which the project is located.

In accordance with Article 7(6) of the CRMA, the Commission provides the Critical Raw Materials (CRM) Board — composed of all Member States and the European Parliament as an observer — with its assessment of whether the proposed projects fulfil the Strategic Project selection criteria.

The CRM Board discusses the proposed projects and issues an opinion on the proposed list of projects before the adoption of the Commission's decision on the list of selected Strategic Projects.

In the context of the environmental impact assessment procedure, the relevant national authority should, in accordance with Directive 2011/92/EU ⁽²⁾ and the Convention on Environmental Impact Assessment in a Transboundary Context ⁽³⁾, take into account possible transboundary impacts.

⁽¹⁾ <https://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=CELEX:02024R1252-20240503>.

⁽²⁾ <https://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=CELEX:02011L0092-20140515>.

⁽³⁾ <https://unece.org/environment-policy/publications/convention-environmental-impact-assessment-transboundary-context>.