AFRICAN CIVIL SOCIETY COMMON POSITION ON **CRITICAL MINERALS FOR GREEN INDUSTRIALISATION AND RENEWABLE ENERGY** AHEAD OF COP29





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Key Messages

- 1. Promote the development of critical energy transition minerals-manufacturing value chains where concerted efforts are made to ensure that locally owned value chains in Africa are developed to buttress the manufacturing of high-quality finished goods required for decarbonized economies and renewable energy systems.
- 2. Advocate for planet-people focused industrial policies linked to the Just Transition Work Programme that promote green industrialization in developing countries.
- **3.** Include the provisioning of financing for Africa's green industrialization, from the global adaptation and mitigation plans through COP29's New Collective Quantified Goals (NCQG).
- **4. Promote People-centred Participation and Ownership in critical minerals production by** advocating and supporting local legislation and policy that mandates economic partnership and reconciliation with local communities and trade unions.
- **5.** Enhance Transparency and Accountability in Mining through International Co-operation by harmonizing and promoting of Environmental, Social, and Governance (ESG) metrics and sustainability programs led by the UN Global Reporting Initiative (GRI) and the EITI Standards.
- 6. Prioritize, support, and recognize the centrality of Artisanal and Small-Scale Miners (ASM) in the mining sector by providing protection and reasonable pathways towards legalization and formalization of employment and labour protections.
- **7. Empower Local Communities:** Prioritizing community-centered renewable energy systems is essential for fostering energy sovereignty, creating decent jobs, and ensuring equitable distribution of energy benefits, ultimately aligning with the UN Sustainable Development Goals.
- 8. Innovate Financing Solutions: Access to fairer financing mechanisms, such as grants and community-led investments, is crucial for overcoming barriers to renewable energy deployment. Ending public subsidies for fossil fuels, establishing robust fossil fuel finance exclusion policies investments, and redirecting funding towards sustainable solutions that uplift local communities is critical.
- **9. Reject False Solutions:** It is imperative to oppose harmful practices like geo-engineering, carbon markets and offsets, and large-scale green hydrogen projects that turn local renewables and fresh water supplies into exportable commodities without addressing providing energy access. Instead, we must advocate for renewable energy solutions that promote sustainability, uphold community rights, and minimize environmental impact.
- **10. Strengthen Renewable Energy Policy Frameworks:** Developing comprehensive policy frameworks and regulatory reforms is vital for creating a supportive environment for renewable energy development. Aligning national strategies with continental initiatives will facilitate a unified and effective approach to achieving Africa's energy transition.

Introduction

COP29 comes at a precarious moment in Africa. 2024 saw the rise and emergence politically of the Gen Z population who in the next 10 years will be the most populous generation on the continent. Protests in Kenya, Nigeria and Uganda signaled an increasingly frustrated generation that are seeking economic dividends to support their demographic strength. This is however quelled by multiple crises highlighted by the increasing climate crisis with many reports suggesting the world will overshoot the 1.5°C limit that the Intergovernmental Panel on Climate Change has consistently warned the world is the upper limit if the human species would like to live in the world as we know it.



There have been growing efforts globally to achieve the IPCC 1.5°C recommendations. The advocacy around renewable energy has moved into the next stage of de-carbonizing how we produce renewable energy. The world is asking itself critical questions such as whether the way we produce solar panels, wind turbines and electric vehicles is sustainable. This has brought to the forefront minerals such as bauxite, lithium, manganese, cobalt and others, collectively known as the Critical Energy Transition Minerals (CETMs) to the forefront.

Moreover, it is now acknowledged that the shift to renewable energy should not just be a technical change from one energy source to another but rather a radical transformation of energy systems to ensure that new low-carbon energies do not repeat the harmful practices of fossil fuels. This has increased the calls for a Just Transition through green industrialization which for Africa includes the understanding that energy at its core, powers the technology and appliances that provide essential goods and services such as, housing, lighting, heating, cooking-critical to providing a 1.2 billion with a sustainable, quality of life, of which its majority do not have.

There is a direct link between critical minerals, green industrialization and renewable energy. The continent has around 40% of the globe's renewable energy sources, yet it has attracted only 2% of renewable energy investments in the past decade. Moreover, in 2024, 20 out of 38 low-income countries in Africa were either in debt distress or at a high risk of distress due to high borrowing costs, tight financing constraints and ongoing debt vulnerabilities. Less than 15% of Africa's gross domestic product comes from manufacturing meaning that it imports most of its necessities such as food, solar panels to light a room and refined oil to power its *tuk tuks* and *kombis.*

In this common position, civil society in Africa have come together to advocate and support the green industrialization through the value addition of its critical energy transition minerals to produce products and services in the renewable energy sector to provide much needed energy to 650 million energy poor. Acknowledging the work done by the United Nations Secretary General's Panel on Critical Minerals, this common position aims to push the conversation forward towards global leaders making Africa's sustainable development a key priority in efforts to de-carbonize the world economy.

COP 29, dubbed the 'finance COP' plays an instrumental role in equipping Africa with much needed finance for its adaptation and mitigation activities which includes green industrialization and increased provisioning of renewable energy on the continent.



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Africa's Key Demands In Critical Minerals, Green Industrialization And Renewable Energy

- A Critical Minerals
- B Green Industrialization
 - Renewable Energy

A Critical Minerals

Critical Energy Transition Minerals (CETMs) are mineral commodities that are necessary for the construction, production, and storage of renewable energy. According to the World Bank, over 3 billion tons of minerals and metals will be needed to deploy wind, solar, battery and geothermal power and energy storage to remain below the 1.5C° global warming target by 2050. By 2040, the demand for lithium will grow by 40 times; for graphite, cobalt, and nickel by a factor of 20-25; and it will more than double for copper. Due to the African continent's great and vast endowments of the CETMS, the global movement towards de-carbonized economies is in a small window of opportunity for continent to jump over the carbon-based industrial revolution into a green industrialization landscape. For that to happen, the CETMs must be extracted, processed, transformed and recycled sustainably and equitably.



In the renewable energy industry, the major uses of CETMs are batteries for electric vehicles and storage, solar photovoltaics, wind turbines. Africa holds between 20% and 90% of the world's reserves of 11 minerals needed for the energy transition, such as platinum group metals, cobalt, chromium, zirconium, lithium, coltan, germanium, etc. In 2022, Africa exported approximately \$29 billion worth of transition mineral products. From 1995 to 2018, energy transition minerals and related products accounted for 23% of total exports from sub-Saharan Africa. Countries around the world are sourcing about \$55 billion worth of energy transition minerals (and related metals) from Africa. And this demand is set to increase further between now and 2050.

However, economic development from these critical energy transition minerals is not shared equitably between the less developed countries (South) and the developed countries (North), where most of the value added to energy transition minerals is co-opted. Studies carried out in several countries producing these minerals show that local communities and the environment are paying a heavy price in terms of negative impacts. Moreover, Africa's vision for sufficiently utilizing transition minerals coded in the African Mining Vision (AMV) has been stifled myopic nation-elite focused mineral policies. There has also been a lack of participation by civil society and the lack of transparency in the negotiating processes of strategic agreements between private companies and African countries.

Africa's current global position of having key CETMs needed for the global-decarbonized economy is not too dissimilar to Africa's position in the last fossil-fuel led industrial revolution where minerals such as coal, gold, silver and others were key resources used globally. However, African countries and their people benefitted very little from those resources because of lack of beneficiation of those raw materials up the value chain resulting in countries being stuck in commodity traps. The erratic fluctuation of commodity prices leaves African governments in precarious situations. Moreover, there is an inclination to stockpile raw materials by manufacturing countries, jeopardizing long-term financial stability of commodity-based economies which are mainly from the Global South. This has also been hampered by corruption, poor labour laws, non-recognition and abuse of informal miners, illicit financial flows and jobless growth which have been negative attributes of Africa's mining sector.

To take full advantage of the transition to a global green economy fuelled by critical minerals, supporting the United Nation's Secretary General's Panel on Critical Energy Transition Minerals, COP 29 should:

- Promote People-centred Participation and Ownership in critical minerals production by advocating and supporting local legislation and policy that mandates economic partnership and reconciliation with local communities and trade unions by participation from project conception to development and oversight, and through robust and inclusive regulatory processes. This should include Community Benefit Agreements to a part of agreements with mining companies, the community and artisanal miners. There should also be meaningful consultation and participation for all communities affected by mining through Free, Prior and Informed Consent including the right to give or withhold consent as aligned with the UN Declaration on the Rights of Indigenous Peoples. This includes conducting environmental and social impact assessments (ESIAs) to evaluate the implications of mining activities on local communities as well as nearby communities. The Community Development Agreements should include profit sharing mechanisms with mining companies that can include jobs, social investments and royalties ring fenced for local development.
- Enhance Transparency and Accountability in Mining through International Co-operation by harmonizing and promoting of Environmental, Social, and Governance (ESG) metrics and sustainability programs led by the UN-led Global Reporting Initiative (GRI) and the EITI Standards. There should also be a development of an international, multi-stakeholder Critical Energy Transition Mineral trade regime certification process to increase transparency and oversight in the minerals supply chain to eliminate labour, tax abuse.
- Prioritize Material Recycling on renewable energy products and services through open/closed-loop recycling specific to Critical Energy Transition Minerals as a basis of manufacturing and processing of the minerals to improve their reclamation and re-usability to limit future mineral extraction. Strategies for managing e-waste effectively should be integrated into renewable energy projects. This involves creating recycling programs and ensuring that obsolete technologies are disposed of in an environmentally sound manner, minimizing the negative effects of e-waste on health and the environment.
- Prioritize, support and recognize the centrality of Artisanal and Small-Scale Miners (ASM) in the mining sector by providing protection and reasonable pathways towards legalization and formalization. Prioritize, support and recognize the centrality of Artisanal and Small-Scale Miners (ASM) in the mining sector by providing protection and reasonable pathways towards legalization and formalization. This should include providing protection and security at a local and national level in high ASM activity areas which will consequentially reduce child labour.
- Mandate the protection of biodiversity, including preventing and mitigating the environmental impact of mining Critical Energy Transition Minerals. Notwithstanding the promise and potential of renewable energy systems providing much-needed clean and renewable energy, their supply chains are a source of considerable environmental damage through pollution of land, water, deforestation, displacement of people and animal species. Environmental Impact Assessment tools must take precedence for any new areas for mining activities.
- Implement legal frameworks to protect the rights of activists, whistle-blowers, human rights and land defenders, journalists and independent media. Such stakeholders play a critical role in providing accountability to governance systems in the mining sector. The lack of their physical, mental and social protection combined with prohibitive laws and policies that hinder free civil society and media limit just energy transition efforts.

Key Message

Promote the development of critical energy transition minerals-manufacturing value chains

where concerted efforts are made to ensure that locally owned value chains in Africa are developed to buttress the manufacturing of high-quality finished goods required for decarbonized economies and renewable energy systems.

B Green Industrialization

Industrial policy as a key framework directing government activity fell down the list of political priorities during the globalization era that stretched from the 1990s to the 2010s. There was a larger focus in that period on opening global markets, reducing tariffs and building global value chains which was seen as the best way to spread prosperity across the world. As a result, goods and services are produced and distributed along global value chains with each node of the material extraction, design, production and retail occurring in different locations. Classic examples include the manufacturing and selling of Nike shoes, iPhones and even the humble washing machine.

However, increasing economic tensions between China and USA, the Covid-29 pandemic and the resulting increase in global inflation and the Ukraine war re-organized political priorities. Terms such as 'onshoring,' reshoring' and 'friendshoring' have become common parlance as industrialized nations have become fixated with re-organizing supply chains to ensure supply security with nations, they have political and economic alliances with. This has also exacerbated local and regional conflict in some communities and regions in Africa coupled with human rights violations as nations try secure access to CETMs.



It is noteworthy that Africa has not been involved in this re-organization beyond being the first stage of supply chains because at no point has Africa had a broad industrial base which de-industrialized or needs to be re-industrialized to effectively affect global industrial patterns. Consequently, since 2000, manufacturing as a share of Africa's GDP has fallen from 18% to 13%¹

Already, there is an uneven industrial geography of green industrialization, where most of the jobs, trade, innovation, and value derived from low-carbon technologies have been captured in a handful of industrialized economies, such as China, the USA, and some European countries. This is coupled with a global industrialization fight between these global regions and Africa is being positioned as a raw materials supplier for the rest of the world.

Moving away from fossil-fuel based industries and economies, there are four broad ways of green industrialization and economies which are, De-Carbonizing Existing Industries, Producing Inputs for Green Industries, Manufacturing Green Goods and Leveraging Existing capabilities. The main hurdles towards Africa's industrialization are unfair industrial practises, lack of technology transfer, expensive financing as well as poor governance frameworks.

 $^{1 \}qquad See: https://futures.issafrica.org/thematic/07-manufacturing/#:~:text=The%20agriculture%20sector's%20share%200f, 2000%20to%2013%25%20in%202020.$

To improve the economic well-being, adaptation and mitigation capacity of Africa, COP29 in relation to Africa's Green Industrialization should:

- Including the provisioning of financing for Africa's green industrialization programmes, from the global adaptation and mitigation plans though COP29's New Collective Quantified Goals NCQG). Africa already faces high levels of debt from a global financial system. Coupled with a climate crisis which it is not of its doing and based on the Common but Differentiated Responsibilities and Respective Capabilities, Africa must receive financing from the COP29 negotiations that are directed towards green industrialization.
- Encourage Technology Transfer and Sharing between developing and developed countries, including the relaxation of national regulations in developed countries that limit the transfer of green technology through the licencing of patents, designs and software for developing countries. This can include the United Nations Technology Bank prioritizing the transfer of life saving technology needed in climate adaptation, mini grid and electric power transmission technology, and processing and refining of critical minerals technology.
- Support Africa's Green Industrialization capacity by promoting the local production of components for batteries, electric vehicles and renewable energy equipment. This should include a rapid increase in the local content requirements in foreign direct investment projects.
- Promote the development of critical energy transition minerals-manufacturing value chains where there are concerted efforts made to ensure that value chains in Africa are developed to buttress the manufacturing of high-quality finished goods required for de-carbonized economies.
- Advocate for the increased regional and continental cooperation in Africa for value chains to be shared on the continent, to eradicate the race to the bottom, increase national synergies between African countries in line with the Africa Free Continental Trade Agreement (AfCTA).
- Advocate for planet-people focused industrial policies linked to the Just Transition Work Programme that promote green industrialization in developing countries. This will include the reality that it is equally important for the world's economy to de-carbonize and support the creation of quality, sustainable green jobs in the Global South. This includes refraining from policies that can be deemed as punishing to the Global South during its transition to de-carbonized economies as is the risk with the European Union Corporate Sustainability Due Diligence (EUCSDD) programme.

Key Message

Include the provisioning of financing for Africa's green industrialization,

from the global adaptation and mitigation plans through COP29's New Collective Quantified Goals (NCQG).

C Renewable Energy

Africa stands at a critical crossroads in its energy transition, with the potential to leapfrog into a renewable energy future. Currently, over 650 million people lack access to electricity, predominantly in sub-Saharan Africa, resulting in an electrification rate of merely 48% in the region. This energy crisis not only hampers economic growth but also stifles the continent's vast human potential, limiting opportunities for education, healthcare, and industrial development. Access to reliable energy is fundamental for the achievement of Sustainable Development Goals (SDGs), particularly Goal 7, which aims for universal access to affordable, reliable, sustainable, and modern energy for all.

Despite these challenges, Africa is endowed with abundant renewable energy resources. The continent's solar photovoltaic (PV) capacity alone has the potential to generate more than 10 terawatts (TW) of power, surpassing current global electricity demand. For instance, countries like South Africa, Morocco, and Egypt are already harnessing solar energy through large-scale solar farms, such as the Noor Ouarzazate Solar Complex in Morocco, which is one of the largest solar power plants in the world. Additionally, Africa boasts significant wind energy potential, particularly in regions like the Horn of Africa (notably in Ethiopia and Kenya) and southern coastal areas, where wind speeds are ideal for large wind farms. Kenya's Lake Turkana Wind Power Project is a prime example, contributing 17% of the country's electricity.

However, Africa's energy mix remains heavily reliant on fossil fuels, with over 80% of energy derived from non-renewable sources. This reliance exacerbates environmental degradation, contributes to air and water pollution, and heightens climate vulnerability. According to the Global Carbon Project, Africa's CO2 emissions from fossil fuels reached 1.3 gigatonnes in 2019, underscoring the urgent need for a transition to cleaner energy sources.

In terms of investment, Africa attracts only 2-3% of global power supply investments, leaving millions without access to essential energy services. According to IRENA, only \$7.4 billion was invested in renewable energy in Africa in 2021, significantly lower than the estimated \$30 billion required annually to meet energy access goals. The African Development Bank (AfDB) has projected that a bold shift towards renewable energy could create over 4 million jobs across the continent by 2050, with off-grid solar and wind sectors leading this job creation. The International Labour Organization (ILO) has also noted that the renewable energy sector has the potential to create 24 million jobs globally by 2030, highlighting the opportunity for Africa to capitalize on this trend.

Furthermore, transitioning to renewable energy could stimulate substantial economic growth; estimates suggest that \$2 trillion in investments will be needed by 2040 to achieve universal energy access and facilitate the transition to 100% renewable energy. The UN Economic Commission for Africa (UNECA) emphasizes that renewable energy can enhance energy security and independence, which are vital for economic resilience, particularly as the continent seeks to recover from the economic impacts of the COVID-19 pandemic.

Frameworks and policies at both the continental and national levels are vital for driving this transition. The African Union's Agenda 2063 emphasizes the importance of renewable energy in achieving sustainable development, advocating for a pan-African energy strategy that promotes investments in renewable technologies. Additionally, the African Renewable Energy Initiative (AREI) aims to achieve at least 300 GW of renewable energy capacity by 2030, promoting local energy solutions and sustainable development. The Paris Agreement also plays a crucial role, with African countries committing to reduce greenhouse gas emissions and enhance resilience to climate change.

However, achieving these targets necessitates overcoming critical barriers, including financing challenges, inadequate infrastructure, and entrenched fossil fuel interests. A report by Africa Progress Panel indicates that while renewable energy investments are rising, they remain insufficient to meet growing demand and to address energy poverty. Furthermore, challenges such as political instability, regulatory hurdles, and lack of grid infrastructure in many regions hinder the deployment of renewable energy projects.

Recognizing that Africa is home to the world's youngest population, whose numbers are expected to triple by 2050, the urgency of providing energy access to this demographic becomes paramount. The World Bank projects that nearly 70% of Africa's population will be under the age of 30 by 2030. Empowering youth with energy access will be crucial for harnessing their potential and driving socio-economic development across the continent. Initiatives that focus on education and skills development in renewable energy technologies can create a workforce ready to lead Africa's energy transition.



In furtherance of Africa's drive towards the end of its reliance on fossil fuels, to increase the access to electricity of 650 million people, COP29 must:

- Prioritizing Community-Centred Renewable Energy Systems by promoting decentralized, communityled renewable energy projects is essential for empowering local populations. This includes empowerment through Local Solutions where communities can develop energy projects tailored to their specific needs, enhancing local ownership and accountability. This fosters energy sovereignty, ensuring that the benefits of renewable energy investments are equitably distributed among community members. Moreover, such systems create decent jobs in the renewable energy sector, including installation, maintenance, and management roles. This will align COP29 with the UN Sustainable Development Goals (SDGs), particularly Goal 7 (Affordable and Clean Energy) and Goal 8 (Decent Work and Economic Growth), helping to stimulate local economies while promoting sustainable practices, reducing poverty, minimizing negative environmental impacts, ensuring that local communities benefit from renewable energy projects.
- Support Equitable Financing Mechanisms that promote innovative, pro-poor financing models. This includes advocating for s pay-as-you-go solar systems and energy community cooperatives, that can provide affordable energy solutions without burdening communities with debt. Such models have been successful in countries like Kenya, where companies like M-KOPA have provided solar energy to off-grid households. It is also critical to prioritize grants and investments in community-led projects over debt-inducing loans. This ensures that funding supports local initiatives and reduces the financial risks associated with large-scale energy projects.

- Ban continued financing of fossil fuel projects especially in Africa by supporting the Fossil Fuels Non-Proliferation Treaty (FFNTP) and establishing a fossil fuel finance exclusion policy that ensures that funding is directed towards sustainable energy solutions. Initiatives like the Climate Investment Funds (CIF) and Green Climate Fund (GCF) should prioritize financing for renewable energy initiatives, emphasizing projects that benefit local communities and address climate change. Additionally, multi-lateral finance institutions like the Africa Development Bank (AfDB), Africa Export-Import Bank (Afrexim Bank), and the Africa Energy Bank must direct all financing to renewable energy projects and programmes.
- Continued rejection of False Solutions such as Carbon Capture, Utilization and Storage (CCUS) Technologies and Green Hydrogen as they perpetuate environmental harm and social injustice. Approaches such as Carbon Capture, Utilization, and Storage (CCUS) and large-scale green hydrogen projects often divert attention and resources away from genuine renewable energy solutions. These technologies can distract from the urgent need to deploy proven renewable technologies like solar, wind, and biomass.
- Strengthening Policy Frameworks that are comprehensive and supportive, crucial for fostering a conducive environment for renewable energy development. This includes governments must prioritizing regulatory reforms that facilitate investment in renewable technologies. Streamlining permitting processes, reducing bureaucratic hurdles, and creating incentives for renewable energy projects are essential to attract both domestic and international investors. These should be supported by establishing clear long-term energy policies allows for greater predictability and stability in the energy market. This encourages private sector investments and aligns national strategies with continental frameworks like the African Union's Agenda 2063 and the African Renewable Energy Initiative (AREI).
- Promote Capacity Building and Technical Assistance in Renewable Energy projects by training workers with green skills that focus on equipping individuals with the necessary skills to install, operate, and maintain renewable energy systems. For instance, initiatives like the Solar Academy in South Africa have been instrumental in building local expertise. In addition, technical assistance programs should focus on enhancing knowledge and skills in renewable energy project development. This includes providing support for project planning, financing strategies, and ongoing management to ensure the sustainability of renewable energy systems. This training is most crucial for communities and workers who rely on fossil fuel industry for their livelihoods.
- Advocate for community stakeholder engagement in the transition to renewable energy. Civil society organizations, communities, indigenous peoples, women, and youth must be involved as key stakeholders in policy and project formulation and implementation. This ensures that diverse perspectives are considered, and that policies and projects are equitable and just. Participatory approaches in project design and implementation ensure that community needs and preferences are prioritized, and this can be institutionalized through Free, Prior, Informed Consent (FPIC), education and awareness practises which aids communities to understand their rights and the implications of renewable energy projects, enabling them to advocate for their interests effectively.

Key Message

Reject False Solutions:

It is imperative to oppose harmful practices like geo-engineering, carbon markets and offsets, and large-scale green hydrogen projects that turn local renewables and fresh water supplies into exportable commodities without addressing providing energy access. Instead, we must advocate for renewable energy solutions that promote sustainability, uphold community rights, and minimize environmental impact.

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Conclusion

As the world is hurtling towards breaking the 1.5°C global warming limit, COP29 is one of the last convenings where tangible action can be done to alleviate the worst of the changing climate. COP29 being dubbed the "Finance COP" also acknowledges that without tangible financial pledges and clear commitments turning into auditable payments from the global north to the global south, in line with the principle of common but differentiated principles, success in addressing the climate crisis will be impossible.

COP29, informed by the United Nations Secretary General's Principles and Recommendations on critical energy transition minerals, must ensure that the global mining industry begins to reorganize in line with Just Transition principles. This includes developing locally owned critical energy transition minerals-manufacturing value chains in Africa, people-centred participation and ownership in critical minerals production, enhanced transparency and accountability in mining through international cooperation, and supporting Artisanal and Small-Scale Miners (ASM) on the continent.

COP29 must also address the global inequality in green industrialization capacity where disparities in funding and rights to use proprietary technologies have locked Africa into producing low-level products and services. Africa has become a resource hub for extraction for the rest of the world, but is left to import finished goods at exorbitant prices, creating ever growing trade deficits and indebtedness. Addressing these inequities must include directing financing from the New Collective Quantified Goals NCQG) towards increasing industrialization in African nations, and clear commitments and intellectual property regime changes to facilitate the transfer of technology necessary to support adaptation and mitigation efforts.

Lastly, COP29 must prioritize the aim of the world producing 100% of its energy needs from renewable energy. This can be done by banning further investment in fossil fuels while closing the existing fossil fuel industries, prioritizing community-centred and led renewable energy systems, rejecting of false solutions such as geoengineering, carbon markets and offsets and building and strengthening renewable energy policy frameworks.

COP29 will ultimately be judged on whether it was the multi-lateral agreement that conclusively led to a radical break away from fossil fuels and triggered the foundation of climate financing that paved the way for a more equitable, just, fair world. Central to that is how seriously African states, civil society and its people's concerns and demands are considered.

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