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To: Agnieszka Bartol, Acting Permanent Representative of Poland to the EU

Brussels, 07 January 2025

Honourable Permanent Representative Bartol,

On behalf of [European Aluminium](#), the association representing the whole aluminium value chain in Europe, I am pleased to welcome Poland to the Presidency of the Council of the European Union.

The Polish Presidency begins at a critical juncture for Europe, marked by a massive industrial crisis, the escalating geopolitical tensions that undermine the continent's economic resilience and security and the need to accelerate the green transition.

As a key component for countless green applications such as wind turbines, solar panels, batteries, and electricity grids, aluminium has been recognised as a **strategic and critical raw material** for the EU green transition. Additionally, aluminium is essential in the digital, aerospace and defence sectors. **Ensuring a resilient European aluminium industry means safeguarding European competitiveness and security.**

Due to the energy crisis sparked by the Russian invasion of Ukraine, our primary production fell from two to one million tonnes in the past two years. High energy costs and unfair market competition increasingly challenge the viability of the European aluminium industry. Despite these challenges, we remain committed to our decarbonisation journey, but achieving this goal requires appropriate public support to ensure a sustainable and competitive future. These factors, combined with the downturn of several traditional markets, such as automotive and building and construction, impose bold and immediate policy actions to prevent our sector from disappearing in Europe.

To return competitive and thrive in our continent, we call on the Polish Presidency to consider our requests, which includes:

- **Adopt sanctions on Russian primary aluminium:** to remain competitive and bolster European efforts to curb Putin's war machine, we urge the Polish Presidency to push for a comprehensive direct and indirect ban on Russian aluminium ingots (HS 7601), complemented by an effective anticircumvention system.
- **A growth-oriented Clean Industrial Deal and a targeted Aluminium Action Plan:** ensuring a policy framework to boost access to cost-competitive low-carbon energy and support investments in decarbonisation and circularity is vital to reignite our competitiveness. Particularly, we recommend adopting assertive measures to curb scrap leakage, which prevents our sector from scaling up its

recycling capacity while saving energy and raw materials in a continent starved for both. In this context and in view of the upcoming “EU Metals Action Plan”, we urge the Polish Presidency to promote a targeted Aluminium Action Plan, which could address the unique challenges faced by our industry.

- **An effective Carbon Leakage Framework:** the Carbon Border Adjustment Mechanism (CBAM), in its current form, does not effectively address carbon leakage in the European aluminium value chain. To remain competitive vis à vis our international competitors, we call for a compelling review of the CBAM to expand the product scope downstream and address all the loopholes that quickly lead to circumvention. Additionally, we advise retaining indirect emissions out of the scope for aluminium and maintaining the ETS indirect cost compensation beyond 2030 - until the grid is fully decarbonised. In this context, we welcome the Polish Presidency’s intention to change the CBAM to enhance the EU’s competitiveness by ensuring a level playing field with competitors, as recently highlighted by the Polish Deputy Minister of EU Affairs Ignacy Niemczycki. We look forward to learning more about your plans and exploring opportunities for collaboration to achieve this.
- **Assertive measures to tackle Chinese state-sponsored overcapacity:** the Chinese government's extensive subsidy programmes have resulted in significant overcapacity throughout the Chinese aluminium value chain. Trade defence instruments are critical but insufficient to yield the European aluminium market and industry. We ask to boost existing trade defence measures and adopt a systemic solution, such as a tariffication regime, to tackle this unprecedented challenge.
- **A cooperative transatlantic trade relationship:** Trump's re-election and threat of tariffs challenge the stability of the transatlantic trade relationship. We hereby request the Polish Presidency to make any possible efforts to prevent Section 232 Tariffs from being reinstated while cooperating on common challenges, such as fighting unfair trade practices adopted by non-market economies.

Amid rising geopolitical tensions, Europe must not risk losing its industrial foundation. We urge the Polish Presidency to take all the required actions to preserve the European aluminium industry and safeguard Europe's competitiveness, resilience, and security.

We greatly appreciate the opportunity to collaborate with you in the upcoming months, and thank you in advance for your support and consideration.

Yours Sincerely,
Paul Voss
Director General, European Aluminium

