

TO: Finance Ministers (ECOFIN); COREPER II and COREPER I Ambassadors.

CC: MEP Pierfrancesco Maran, ENVI Chair; MEP Mohammed Chahim, ENVI Rapporteur on the CBAM Review; Kurt Vandenberghe, Director-General, DG CLIMA; Gerassimos Thomas, Director-General, DG TAXUD; Maria Elena Scoppio, Director for Indirect Taxation and Tax Administration; Vicente Hurtado Roa, Head of Unit C.2 – CBAM, Energy and Green Taxation, DG TAXUD; Astrid van Mierlo, Head of Unit C.5 - Economic Analysis and Taxation of Exempted Sectors, DG TAXUD

9 June 2026, Brussels

Subject: Urgent need to address critical CBAM shortcomings for aluminium

Dear Ministers of Finance,

Dear Ambassadors,

European Aluminium welcomes the progress reflected in the latest draft Council General Approach on the CBAM Review. In particular, the new downstream products added to the scope and the improvements to Article 27a strengthen the Commission's original proposal.

Nevertheless, CBAM remains inadequate to prevent carbon leakage in the aluminium sector¹. Several fixes are still needed. In particular, ahead of the adoption of the General Approach, provisionally scheduled for the 12th of June, we remain deeply concerned about the following key issues, which have already been partially addressed by the European Parliament:

1. Closing the aluminium scrap loophole

The aluminium scrap loophole is a serious threat to aluminium production in Europe, including recycling. It creates an unlevelled playing field on carbon costs field between recyclers inside and outside Europe. It stems from the fact that post-consumer scrap is not treated as a precursor under CBAM, unlike pre-consumer scrap.

Because 25% of all aluminium in products is post-consumer scrap, it also poses a threat to every aluminium product made in Europe. If left unresolved, it will incentivise imports of recycled aluminium that have not faced an equivalent carbon cost, while European recyclers and producers continue to pay under the EU ETS. This would distort scrap flows, weaken European recycling capacity, and undermine investment in low-carbon aluminium production. Importers will also be able to fraudulently declare scrap content because it is very difficult to verify such claims.

To close the loophole, European Aluminium recommends introducing a single default value for unwrought aluminium, as proposed in Amendments 79 and 231 tabled in the European Parliament's ENVI Committee²³. Recitals 19 and 20, together with Annex III on precursor materials, should also be amended to include post-consumer scrap.

This is essential to ensure equal treatment of pre- and post-consumer scrap, prevent circumvention and level the playing field.

¹ See European Aluminium position paper [here](#) [February 2026]

² EP ENVI Committee - AMENDMENTS 35 – 234 [\[link\]](#)

³ Amendments 96 and 112 in combination with amendment 1370 tabled by the ENVI Committee move in this direction

2. Addressing the mass-based threshold

European Aluminium is also concerned about the mass-based threshold introduced in the CBAM simplification package.

While intended to reduce administrative burdens by exempting imports below 50 tons, such a weight-based threshold allows a large share of aluminium goods to be exempt, particularly aluminium semi-manufactured goods, which represent an important market for European producers, given their high value-to-weight ratio.

European producers will continue to pay CBAM-related carbon costs, while importers will be exempted, thereby creating an avenue for carbon leakage and undermining the level playing field.

The practical impact of this loophole is substantial. For example, renovating the doors of a 200-room hotel requires approximately 418 aluminium doors, corresponding to only 9.2 tonnes of aluminium⁴. Such imports would therefore be exempt from CBAM, while equivalent products manufactured in the EU would continue to face carbon costs under the EU ETS.⁵

3. More goods need to be added

While we welcome the proposed addition of more downstream goods, many important products, including several ones that are 100% aluminium-based, are still missing⁶. For example, CN CODES under chapter 7615 - and in particular 7615 10 30 - are not present in the draft General Approach.

We therefore urge Member States to address these elements as a matter of priority in the upcoming negotiations to ensure that the mechanism delivers on its objectives and improves protection against carbon leakage in the aluminium sector.

However, if these barriers remain unsolved, we call upon the EU Commission to urgently “stop the clock”⁷ on CBAM for aluminium (pausing the implementation of the definitive period of CBAM and the related phasing-out of free allowances for the aluminium sector) until the proposed changes have been implemented and the impact of CBAM on the competitiveness of the EU aluminium industry, also with the proposed changes, has been fully assessed.

Yours sincerely,

Paul Voss



⁴In practice, imports would need to exceed approximately 2,270 aluminium doors to reach the 50-tonne threshold and become subject to CBAM, a volume that is rarely reached in a single shipment.

⁵ For these reasons, we strongly support ENVI amendments 58 and 1373, which introduce a lower threshold for aluminium.

⁶ See our list of CN codes in the European Aluminium Position Paper - CBAM downstream scope extension and anti-circumvention measures [\[link\]](#).

⁷ See European Aluminium position paper [here](#) [February 2026]