



To: European Commission

**Subject: Non-ferrous metals industry call for action on EF compliant database**

Dear Sir, Dear Madam,

European Metals, the European non-ferrous metals association, is writing to express the concerns of our industry regarding the current uncertainty surrounding the Environmental Footprint (EF) database framework, in particular the termination of the contract related to the development of the EF Database 4.0 and the absence of an extension to the validity of the EF 3.1 datasets. At the same time, we welcome the European Commission's recent guidance on the implementation of Recommendation (EU) 2021/2279 which provides clarity for stakeholders and ensures continuity for Environmental Footprint studies during the transition period.

European Metals represents Europe's non-ferrous metals value chain, including producers and recyclers of aluminium, copper, nickel, zinc, lead, lithium, cobalt, precious metals, and other strategic and critical raw materials essential for Europe's green and digital transitions.

Our association has been actively engaged in the Environmental Footprint initiative since its inception, through the development of the PEFCR for Metal Sheets, and our

current involvement in the European Commission PEF Technical Advisory Board (TAB). Many of our member associations have actively contributed and submitted data to EF 3.1 database and had invested a significant amount of time and resources gathering data for the development of the 4.0 database.

Environmental Footprint developments are becoming increasingly interesting for our members, especially as the methodology becomes increasingly embedded in major EU legislative instruments, such as the Ecodesign for Sustainable Products Regulation, the Batteries Regulation and the Critical Raw Materials Act.

**We strongly support the objectives of the EU Environmental Footprint methodology.**

The EF framework improves life-cycle assessment methodologies by introducing harmonised rules, enhanced data quality requirements, and a cradle-to-grave approach that includes end-of-life considerations. However, the robustness of the framework and its implementation rely on the availability of robust, harmonised, and widely accessible and free secondary datasets.

Without a common reference database, comparability between products, materials, and producers cannot be guaranteed. This is particularly concerning given that Environmental Footprint or carbon footprint requirements are increasingly linked to product comparison, sustainability claims, and potentially market access under several EU policy instruments.

We welcome the pragmatic interim solution that allows EF studies to continue through the use of alternative datasets where EF-compliant datasets are not available.

The recently published guidance for the transition phase provides some indications on a temporary way forward helping to fill the gap. However, in the absence of an operational and harmonised EF database, companies are left with no practical alternative but to rely on multiple external and often costly datasets and databases. This not only creates disproportionate financial and administrative burdens but also undermines the consistency, comparability, and credibility of Environmental Footprint Declarations across sectors and operators.

While this interim flexibility is necessary, it remains only a temporary mitigation measure and does not replace the need for a stable, harmonised, and mandatory EF database framework that is needed to satisfy environmental and carbon footprint requirements when included in the legislation.

**We therefore call on the European Commission to prioritise the process for the development and the finalisation of the EF Database 4.0, while remaining**

**appreciative of the current efforts to find a temporary pragmatic solution, and to officially present a way forward to address the current issue in the medium and long term.**

In the wait for new developments under the database 4.0, industry would welcome additional direction in the development of datasets that could be made available by the industry to LCA users that wishes to apply the EF methodology, also for legal reporting.

The European Commission should however develop and publish an official methodology for the development of EF-compliant datasets, with the corresponding elementary flow list, to ensure coherent and consistent modelling of the datasets. The industry would in addition welcome the establishment of a datasets exchange node, managed by the European Commission, which could host such EF-compliant and high-quality datasets, even when developed outside framework contracts.

**Together with our members, we remain fully committed to constructive engagement with the European Commission to ensure that the EF framework can effectively support Europe's sustainability objectives while remaining operationally feasible and scientifically robust for industry.**

We also want to stress again the willingness of the metal industry to contribute with high quality inventory data and expertise for the development of EF-compliant datasets.

Yours faithfully,

## Signatories:



European Metals is an umbrella association representing the interests of the combined non-ferrous metals industry towards EU policy makers. We bring together the companies and associations shaping Europe's non-ferrous metals ecosystem: from upstream mining and refining to downstream use and high-quality recycling. By connecting technical expertise with policy action, we ensure that the importance of the metals sector is recognised, valued, and that our sector's future is secured. For more information, visit our

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European Aluminium, founded in 1981 and based in Brussels, is the voice of the aluminium industry in Europe. We actively engage with decision makers and the wider stakeholder community to promote the outstanding properties of aluminium, secure growth and optimise the contribution our metal can make to meeting Europe's sustainability challenges. Our 100+ members include primary aluminium producers; downstream manufacturers of extruded, rolled and cast aluminium; producers of recycled aluminium and national aluminium associations, representing more than 600 plants in 30 European countries. Aluminium products are used across a wide range of markets, including automotive, transport, renewable energy infrastructure, building and construction, defence, and packaging. [www.european-aluminium.eu](http://www.european-aluminium.eu)

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The International Copper Association (ICA) Europe is the leading advocate for the copper industry in Europe. As ICA's European branch, the organisation represents companies in Europe and globally that mine, smelt and recycle copper for use across the economy, in the electricity system, buildings, transport and industry. Through a team of policy, industry and scientific experts, ICA Europe promotes copper as an essential material for achieving the EU's ambition of a resilient, climate-neutral Europe and seeks to ensure that EU policies enable the sustainable production of copper to serve Europe's future needs.

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The Nickel Institute is the global association of leading primary nickel producers. Our mission is to advocate for the responsible supply of nickel and the sustainable development of the nickel industry. The NI grows and supports markets for new and existing nickel applications including stainless steel, and promotes sound science, risk management, and socio-economic benefit as the basis for public policy and regulation.

Through our science division NiPERA Inc., we also undertake leading-edge scientific research relevant to human health and the environment. The NI is the centre of excellence for information on nickel and nickel-containing materials and has offices in Asia, Europe and North America.

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**The European Precious Metals Federation (EPMF)** is an international trade association representing the interests of the precious metals industry in Europe. The main purpose of the EPMF is to promote and support the European precious metals industry, including refining, recycling, trading, and fabrication of precious metals such as gold, silver, platinum, and palladium. The EPMF represents the interests of its members in discussions with regulators, policy makers, and other stakeholders, mainly in sustainability and chemicals management fields. The organization also seeks to provide information and resources to its members in critical areas like EU regulations and new science.

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The **International Platinum Group Metals Association (IPA)** represents over 80% of the global **Platinum Group Metals (PGMs)** industry, encompassing the leading companies involved in the mining, refining, recycling, and fabrication of PGMs. The IPA provides a platform to address issues of common concern and to jointly engage with stakeholders at the international level.

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ADVANCED RECHARGEABLE & LITHIUM BATTERIES ASSOCIATION



[RECHARGE](#) is the European industry association for advanced rechargeable and lithium batteries. Founded in 1998, it is our mission to promote advanced rechargeable batteries as a key technology that will contribute to a more empowered, sustainable and circular economy. RECHARGE's unique membership covers all aspects of the advanced rechargeable battery value chain in Europe: from suppliers of primary and secondary raw materials, to battery, equipment and original equipment manufacturers (OEMs), to logistic partners and battery recyclers. [www.rechargebatteries.org](http://www.rechargebatteries.org)

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The International Zinc Association (IZA) provides global leadership, coordination, and value on strategic issues for the zinc industry, including market development, license to operate, communications, and sustainability. IZA is the only organization dedicated exclusively to the interests of zinc and its users. IZA provides a forum for the zinc industry to analyze and anticipate issues affecting zinc globally and to ensure a timely and appropriate response. IZA coordinates positive initiatives for zinc that are best done collectively, undertaken either directly or through involvement and support of customer groups and related stakeholders on the local, regional, and global levels.\*

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