

TO : Heads of National Delegations of the Political Groups in the European Parliament & Conference of Presidents & Committee Chairs

CC : Committee Coordinators; CBAM Rapporteurs; H.E. Ambassador Aingeal O'Donoghue, Permanent Representative of Ireland to the European Union

Subject line: CBAM Review – Support the plenary amendments protecting Europe's aluminium industry

Dear Member of the European Parliament,

Ahead of next [week's plenary vote](#) on Tuesday regarding the revision of the Carbon Border Adjustment Mechanism (CBAM), we urge you to support the plenary amendments addressing two critical shortcomings for aluminium: [the post-consumer aluminium scrap loophole](#) and the [50-tonne threshold for aluminium imports](#).

Supporting these amendments is about much more than cleaning up some technical details in the text. It is about reconciling the twin imperatives of climate policy and industrial competitiveness in a single, well-crafted piece of legislation. Europe cannot decarbonise its economy while allowing the decline of an industry that supplies a strategic and circular metal needed to achieve it.

A workable CBAM is therefore essential not only to prevent carbon leakage, but also to safeguard industrial activity, investment, 1 million direct and indirect jobs, and growth across the European aluminium value chain.

1. Close the aluminium post-consumer scrap loophole: Support [Amendments 111](#), [112](#) and [136](#) [See p.3 [voting list](#)]

These amendments are necessary because recycled aluminium carries the same carbon cost as primary aluminium in the EU. They are interchangeable goods with the same properties and the same fundamental market price, which is set at the London Metal Exchange (LME). Everyone in the EU also pays a European premium, which includes CBAM and ETS costs, plus transport and handling costs. This applies to both primary and secondary aluminium:

- [The amendment to Recital 14a](#) explains the need for equal carbon costs and provides the necessary framework for applying a single default value for unwrought aluminium, backed by appropriate safeguards. This is essential to level the playing field by protecting European producers from unfair carbon-cost competition for imported products and prevent circumvention through resource shuffling and unverifiable claims about scrap content.
- [The amendment to the Annex](#) provides the corresponding operational fix by including all aluminium scrap as a precursor. Without this change, imported aluminium products could continue to benefit from lower carbon costs by using post-consumer scrap.

On WTO compatibility, protecting EU circularity requires a level playing field for European recyclers. CBAM's purpose is to equalise carbon costs and encourage recycling in Europe, not to solve accounting and traceability issues. Integrating these amendments into the anti-circumvention framework outlined in the ENVI report would do exactly that without, discriminating against imports, while preserving an environmental rationale and providing a strong basis for WTO compatibility.

Without these changes, around one quarter of global aluminium production could continue to avoid carbon costs equivalent to those borne by European producers, weakening the competitiveness of primary producers, recyclers and downstream manufacturers without delivering additional emissions reductions.

2. Lower the 50-tonne threshold to 5 tonnes for aluminium goods: Support [Amendments 113, 133 and 97](#) [See p.3 [voting list](#)]

We also urge you to support the plenary amendments addressing the proposed 50-tonne threshold for aluminium. A mass-based threshold of 50 tonnes is simply not suited to aluminium because of its high value-to-weight ratio. It would leave significant volumes of downstream imports outside CBAM even where they compete directly with EU-made goods carrying ETS and CBAM-related carbon costs.

It should be lowered to 5 tonnes because, in market value terms, 50 tonnes can represent purchases worth hundreds of thousands of euros for products supplied to the transport, buildings and renewable energy sector. Leaving this issue unresolved until a later review of the mechanism will reduce value creation across Europe and cause consequential job losses.

For example, the aluminium required for around 418 doors for a 200-room hotel amounts to just 9.2 tonnes. Such imports could therefore remain exempt from CBAM, while equivalent products manufactured in Europe continue to bear carbon costs.

This means significant imports can escape CBAM costs and gain an advantage over European producers, especially SMEs.

We therefore urge you to support the above amendments. These will help secure European investment, jobs, and growth, and avoid that CBAM further weakens the European Aluminium value chain.

Yours sincerely,

Paul Voss, Director General



Paul Warton, Chair at European Aluminium



and the Executive Committee member companies supporting this letter

