27 November 2026

Subject: 30 November CBAM trilogue: make the mechanism work for aluminium

Dear representatives of the Irish Presidency,
Dear European Parliament CBAM negotiating team,

Ahead of the political trilogue next 30 November, we refer you to our letter of 14 October[1] and urge you to keep in the final text the two targeted aluminium safeguards already in the European Parliament's position:

- **Add post-consumer aluminium scrap to the precursor list by removing the distinction between pre and post-consumer aluminium scrap** and **allow one default value for unwrought aluminium** based on the average emissions intensity of primary aluminium in the country of smelting;

- and **lower the annual de minimis threshold for aluminium imports from 50 tonnes to 5 tonnes**.

1- Close the aluminium post-consumer scrap loophole and introduce the single default value for aluminium

CBAM must mirror the EU ETS, but that principle must reflect how carbon costs move through the aluminium market. Post-consumer scrap has no direct ETS liability, but it carries an indirect carbon cost in Europe: ETS and CBAM costs on primary aluminium are reflected in the European regional premium. Scrap contracts track LME-linked metal values. These linked prices pass the higher premium through to post-consumer scrap prices, increasing feedstock costs for European recyclers. This will create a competitive asymmetry: imported scrap-based goods will be carbon-cost-free while European recyclers will pay this premium-driven cost increase in their raw material supply. Also, around 25 million tonnes of post-consumer scrap, roughly a quarter of the global market, is available for this cost avoidance. Adding post-consumer scrap as a precursor and applying a single default value to unwrought aluminium closes this route while preserving the incentives to decarbonise.

2- Lower the 50-tonne threshold exemption to 5 tonnes for aluminium

We recognise the importance of the recently agreed simplification threshold. But retaining 50 tonnes for aluminium would exempt commercially meaningful orders in fragmented extrusion and rolling markets. For example, 418 aluminium doors for a 200-room hotel weigh about 9.2 tonnes and would fall wholly outside CBAM. A 5-tonne threshold is a focused correction: it prevents substantial aluminium trade from escaping the mechanism and limits avoidance through split orders. Simplification cannot leave a material part of the aluminium market value unprotected.

We urge negotiators to include both safeguards – already supported by the European Parliament - in the final text.

Without these fixes, CBAM will not work for aluminium: it will leave significant imports outside its scope, lead to more, not less, carbon leakage across the industry by offering no equivalent level playing field in terms of carbon costs, and fail to deliver on its environmental objectives by undermining aluminium recycling in Europe.

Thank you for your consideration.

Yours sincerely,

Paul Voss

[1] https://www.linkedin.com/posts/european-aluminium-letter-on-cbam-trilogues-ugcPost-7523385477308043264-uEyG/

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