

Targeted consultation: EU measure for aluminium scrap – questionnaire for stakeholders

Fields marked with * are mandatory.

A

Introduction

On 19 March 2025, the Commission adopted a [Steel and Metals Action Plan](#), outlining actions across different policy areas, including trade. In the field of trade, the Commission committed to consider a trade measure to ensure sufficient availability of scrap by the third quarter of 2025. In addition, the [RESourceEU Action Plan](#) of 03 December 2025 states that “By Q2 2026, the Commission will also propose targeted measures for aluminium scrap”.

In this context, the Commission launched an import and export surveillance system in July 2025. For the aluminium sector, the monitoring of trade flows has revealed that exports of aluminium scrap to third countries in 2025 remain at a relatively high level. Notably, exports of aluminium scrap currently follow the same trend in terms of level of exports as in 2024, where they amounted to 1.2 million tonnes. 2024 exports of aluminium scrap have increased by 66% compared to 2014 exports. At the same time, some stakeholders have noted that aluminium scrap prices have substantially increased with respect to the London Metal Exchange (“LME”) price for aluminium^[1], which may affect the affordability and availability of aluminium scrap within the EU.

Against this background, the Commission has now launched the present targeted consultation, in which we are seeking – via a questionnaire – stakeholders’ views on potential options for a possible trade measure.

The Commission intends to prepare a balanced trade measure that will allow industries using aluminium scrap to access adequate quantities of this strategically important material at competitive prices in order to advance their path towards decarbonisation, in line with the logic of a circular economy.

The Commission is reaching out for information from stakeholders at different levels of the value chain (producers of primary and secondary aluminium, recyclers, traders, users, etc) in order to properly assess the impact of the different options throughout the entire EU’s aluminium supply chain. The information provided by stakeholders via this questionnaire is therefore very important.

The questionnaire is composed of SEVEN sections, labelled **A** to **G**. Section **A** consists of the present introduction. Section **B** asks for information about the respondent. Section **C** asks for information about the

respondent's business activities and environment. Choices made by the respondent at the start of section C determine which (if any) of the supplementary questions in sections **D** to **F** are presented to the respondent. Finally, section **G** invites stakeholders to express their opinions on the necessity for an EU policy measure on aluminium scrap, to explain their preferences for any measure on scrap that may be proposed by the Commission, and to indicate their views on the possible form, structure and content of such a policy measure.

The closing date for submitting a response to this questionnaire is **midnight on 31 January 2026** (ie, 00:00 CET on 01 February 2026).

[1] According to Harbor consultancy, aluminium scrap prices reached the level of 96% of LME price of aluminium ingot in the third trimester of 2025.

B About you

*** B.1 Language of my contribution**

- ☐ Bulgarian
- ☐ Croatian
- ☐ Czech
- ☐ Danish
- ☐ Dutch
- ☒ English
- ☐ Estonian
- ☐ Finnish
- ☐ French
- ☐ German
- ☐ Greek
- ☐ Hungarian
- ☐ Irish
- ☐ Italian
- ☐ Latvian
- ☐ Lithuanian
- ☐ Maltese
- ☐ Polish
- ☐ Portuguese
- ☐ Romanian

- ☐ Slovak
- ☐ Slovenian
- ☐ Spanish
- ☐ Swedish

* B.2 I am giving my contribution as

- ☐ Academic/research institution
- ☒ Business association
- ☐ Company/business
- ☐ Consumer organisation
- ☐ EU citizen
- ☐ Environmental organisation
- ☐ Non-EU citizen
- ☐ Non-governmental organisation (NGO)
- ☐ Public authority
- ☐ Trade union
- ☐ Other

The Commission will publish all contributions to this public consultation *with the exception of responses to questions under sections C, D, E and F which request information that may be commercially sensitive.*

The Commission reserves the right to use information submitted under sections C, D, E and F at an aggregated or average level during the legislative process for a potential future measure for aluminium scrap.

You can choose whether you would prefer to have your details published or to remain anonymous when your contribution is published. **For the purpose of transparency, the type of respondent (for example, 'business association, 'consumer association', 'EU citizen') country of origin, organisation name and size, and its transparency register number, are always published. Your e-mail address will never be published.** Opt in to select the privacy option that best suits you. Privacy options default based on the type of respondent selected

* B.4 **Contribution publication privacy settings**

The Commission will publish the responses to this public consultation with the exception of responses to questions under sections C, D, E and F. You can choose whether you would like your details to be made public or to remain anonymous.

☒ **Anonymous**

Only organisation details are published: The type of respondent that you responded to this consultation as, the name of the organisation on whose behalf you reply as well as its transparency number, its size, its country of origin and your contribution will be published as received. Your name will not be published. Please do not include any personal data in the contribution itself if you want to remain anonymous.

☐ **Public**

Organisation details and respondent details are published: The type of respondent that you responded to this consultation as, the name of the organisation on whose behalf you reply as well as its transparency number, its size, its country of origin and your contribution will be published. Your name will also be published.

☒ I agree with the [personal data protection provisions](#)

* B.5 First name (anonymity requested)

Ari

* B.7 Surname (anonymity requested)

Virta

* B.9 Email (this won't be published)

ari.virta@kierratysteollisuus.fi

* B.13 Organisation name

255 character(s) maximum

Kierrätysteollisuus ry

* B.14 Organisation size

- ☒ Micro (1 to 9 employees)
- ☐ Small (10 to 49 employees)
- ☐ Medium (50 to 249 employees)

- ☐ Large (250 or more)

B.15 Transparency register number

Check if your organisation is on the transparency register. It's a voluntary database for organisations seeking to influence EU decision-making.

624544817846-49

*B.16 Country of origin

Please add your country of origin, or that of your organisation.

This list does not represent the official position of the European institutions with regard to the legal status or policy of the entities mentioned. It is a harmonisation of often divergent lists and practices.

- | | | | |
|---|--|--|--|
| ☐ Afghanistan | ☐ Djibouti | ☐ Libya | ☐ Saint Martin |
| ☐ Åland Islands | ☐ Dominica | ☐ Liechtenstein | ☐ Saint Pierre and Miquelon |
| ☐ Albania | ☐ Dominican Republic | ☐ Lithuania | ☐ Saint Vincent and the Grenadines |
| ☐ Algeria | ☐ Ecuador | ☐ Luxembourg | ☐ Samoa |
| ☐ American Samoa | ☐ Egypt | ☐ Macau | ☐ San Marino |
| ☐ Andorra | ☐ El Salvador | ☐ Madagascar | ☐ São Tomé and Príncipe |
| ☐ Angola | ☐ Equatorial Guinea | ☐ Malawi | ☐ Saudi Arabia |
| ☐ Anguilla | ☐ Eritrea | ☐ Malaysia | ☐ Senegal |
| ☐ Antarctica | ☐ Estonia | ☐ Maldives | ☐ Serbia |
| ☐ Antigua and Barbuda | ☐ Eswatini | ☐ Mali | ☐ Seychelles |
| ☐ Argentina | ☐ Ethiopia | ☐ Malta | ☐ Sierra Leone |
| ☐ Armenia | ☐ Falkland Islands | ☐ Marshall Islands | ☐ Singapore |
| ☐ Aruba | ☐ Faroe Islands | ☐ Martinique | ☐ Sint Maarten |
| ☐ Australia | ☐ Fiji | ☐ Mauritania | ☐ Slovakia |
| ☐ Austria | ☒ Finland | ☐ Mauritius | ☐ Slovenia |
| ☐ Azerbaijan | ☐ France | ☐ Mayotte | ☐ Solomon Islands |
| ☐ Bahamas | ☐ French Guiana | ☐ Mexico | ☐ Somalia |

- | | | | |
|--|---|---|--|
| ☐ Bahrain | ☐ French Polynesia | ☐ Micronesia | ☐ South Africa |
| ☐ Bangladesh | ☐ French Southern
and Antarctic
Lands | ☐ Moldova | ☐ South Georgia
and the South
Sandwich Islands |
| ☐ Barbados | ☐ Gabon | ☐ Monaco | ☐ South Korea |
| ☐ Belarus | ☐ Georgia | ☐ Mongolia | ☐ South Sudan |
| ☐ Belgium | ☐ Germany | ☐ Montenegro | ☐ Spain |
| ☐ Belize | ☐ Ghana | ☐ Montserrat | ☐ Sri Lanka |
| ☐ Benin | ☐ Gibraltar | ☐ Morocco | ☐ Sudan |
| ☐ Bermuda | ☐ Greece | ☐ Mozambique | ☐ Suriname |
| ☐ Bhutan | ☐ Greenland | ☐ Myanmar/Burma | ☐ Svalbard and
Jan Mayen |
| ☐ Bolivia | ☐ Grenada | ☐ Namibia | ☐ Sweden |
| ☐ Bonaire Saint
Eustatius and
Saba | ☐ Guadeloupe | ☐ Nauru | ☐ Switzerland |
| ☐ Bosnia and
Herzegovina | ☐ Guam | ☐ Nepal | ☐ Syria |
| ☐ Botswana | ☐ Guatemala | ☐ Netherlands | ☐ Taiwan |
| ☐ Bouvet Island | ☐ Guernsey | ☐ New Caledonia | ☐ Tajikistan |
| ☐ Brazil | ☐ Guinea | ☐ New Zealand | ☐ Tanzania |
| ☐ British Indian
Ocean Territory | ☐ Guinea-Bissau | ☐ Nicaragua | ☐ Thailand |
| ☐ British Virgin
Islands | ☐ Guyana | ☐ Niger | ☐ The Gambia |
| ☐ Brunei | ☐ Haiti | ☐ Nigeria | ☐ Timor-Leste |
| ☐ Bulgaria | ☐ Heard Island and
McDonald Islands | ☐ Niue | ☐ Togo |
| ☐ Burkina Faso | ☐ Honduras | ☐ Norfolk Island | ☐ Tokelau |
| ☐ Burundi | ☐ Hong Kong | ☐ Northern Mariana
Islands | ☐ Tonga |

☐ Cambodia	☐ Hungary	☐ North Korea	☐ Trinidad and Tobago
☐ Cameroon	☐ Iceland	☐ North Macedonia	☐ Tunisia
☐ Canada	☐ India	☐ Norway	☐ Türkiye
☐ Cape Verde	☐ Indonesia	☐ Oman	☐ Turkmenistan
☐ Cayman Islands	☐ Iran	☐ Pakistan	☐ Turks and Caicos Islands
☐ Central African Republic	☐ Iraq	☐ Palau	☐ Tuvalu
☐ Chad	☐ Ireland	☐ Palestine	☐ Uganda
☐ Chile	☐ Isle of Man	☐ Panama	☐ Ukraine
☐ China	☐ Israel	☐ Papua New Guinea	☐ United Arab Emirates
☐ Christmas Island	☐ Italy	☐ Paraguay	☐ United Kingdom
☐ Clipperton	☐ Jamaica	☐ Peru	☐ United States
☐ Cocos (Keeling) Islands	☐ Japan	☐ Philippines	☐ United States Minor Outlying Islands
☐ Colombia	☐ Jersey	☐ Pitcairn Islands	☐ Uruguay
☐ Comoros	☐ Jordan	☐ Poland	☐ US Virgin Islands
☐ Congo	☐ Kazakhstan	☐ Portugal	☐ Uzbekistan
☐ Cook Islands	☐ Kenya	☐ Puerto Rico	☐ Vanuatu
☐ Costa Rica	☐ Kiribati	☐ Qatar	☐ Vatican City
☐ Côte d'Ivoire	☐ Kosovo	☐ Réunion	☐ Venezuela
☐ Croatia	☐ Kuwait	☐ Romania	☐ Vietnam
☐ Cuba	☐ Kyrgyzstan	☐ Russia	☐ Wallis and Futuna
☐ Curaçao	☐ Laos	☐ Rwanda	☐ Western Sahara
☐ Cyprus	☐ Latvia	☐ Saint Barthélemy	☐ Yemen
☐ Czechia	☐ Lebanon	☐ Saint Helena Ascension and Tristan da Cunha	☐ Zambia

- ☐ Democratic Republic of the Congo
- ☐ Lesotho
- ☐ Saint Kitts and Nevis
- ☐ Zimbabwe
- ☐ Denmark
- ☐ Liberia
- ☐ Saint Lucia

C About your business activities and business environment

* C.1 What is your business activity?

(Multiple options can be selected.)

- ☐ **Recycling:** collecting scrap from various sources, such as construction and demolition sites, vehicle scrapyards, or household appliances; and the sorting of that scrap at a scrap yard
- ☐ **Recycling:** shredding or shearing the scrap
- ☐ **Recycling:** sorting and processing of scrap to prepare it for the melting stage
- ☐ **Production:** aluminium production using aluminium scrap ("secondary aluminium production"), involving the melting and refining of processed scrap
- ☐ **Production:** production of primary aluminium
- ☐ **Production:** production of aluminium semi-finished or final products (downstream users)
- ☒ Any other activities *(please specify below)*

* C.2 If you selected "*any other activities*" in response to question C.1, please describe those activities in the space provided.

2000 character(s) maximum

business association of Finnish recycling industries

* C.3 Have you recently made investments in order to increase your recycling or production capacity – **and/or** are you planning to make such investments?

- ☐ Yes
- ☒ No

* C.5 Are you involved in **exporting** aluminium scrap from the EU?

- ☐ Yes

☒ No

* C.7 Are you involved in **importing** aluminium scrap from outside the EU?

☐ Yes

☒ No

C.9 What are your expectations about the evolution of demand in your key markets?

Please provide both qualitative and quantitative details, to the extent possible.

2000 character(s) maximum

G On the need for and structure of possible trade measures on aluminium scrap

The European Commission's [Steel and Metals Action Plan](#) of 19 March 2025 contained the following statement:

"An important number of third countries do not allow metal scrap to be exported to the EU, thereby reducing access to this strategic secondary raw material. Certain countries also apply unfair subsidies to support their metal recycling and production industries. That is why the Commission is monitoring the situation and will consider proposing, by third quarter of 2025 at the latest, a trade measure if necessary to ensure sufficient availability of scrap in the EU."

More recently, the Commission's [RESourceEU Action Plan](#) of 03 December 2025 stated that... *"By Q2 2026, the Commission will also propose targeted measures for aluminium scrap."*

* G.1 Do you agree with the necessity for such a measure?

☐ Yes

☒ No

G.2 Please explain the reasoning behind your answer

1000 character(s) maximum

Banning or restricting exports is not necessary, neither is it practical.
Annual generation of scrap in EU is over 6 Mt, while the EU demand is about 5 Mt. The 1 Mt of annual surplus cannot be used in EU.
Restricting export would create constant oversupply which would hurt the recycling business. They would have to reduce operations, i.e. decrease economic activity and employment.
The surplus scrap would be left unutilised.

* G.3 Which type of measure would you consider to be the most appropriate and effective way of ensuring availability of scrap in the EU for the aluminium sector?

Commission Implementing Regulation (EU) 2025/1926 of 23 September 2025 amending Annex I to Council Regulation (EEC) No 2658/87 on the tariff and statistical nomenclature and on the Common Customs Tariff

7602 00 11 Turnings, shavings, chips, milling waste, sawdust and filings; waste of coloured, coated or bonded sheets and foil, of a thickness (excluding any backing) not exceeding 0,2 mm)

7602 00 19 Other (including factory rejects)

7602 00 90 Scrap

- ☐ A measure to ensure availability of aluminium scrap in the EU which should have the characteristics set out below: *(please explain in the text box)*
- ☐ A **uniform** export duty for all types of aluminium scrap classified under subheading **CN 7602 00** of the [EU Combined Nomenclature](#)
- ☐ A **differentiated** export duty for scrap products classified under subheading **7602 00** of the [EU Combined Nomenclature](#)
- ☐ A duty-free, *first come, first served* tariff-rate quota (**TRQ**) for exported scrap, together with an out-of-quota duty
- ☒ I do not consider any type of measure to be appropriate.

G.5 In case the Commission's proposed measure takes the form of a **uniform** export duty for all types of scrap classified under subheading **CN 7602 00**, at what level should the export duty be set?

- ☐ 5%
- ☐ 10%
- ☐ 20%
- ☐ 30%
- ☐ Higher than 30% *(please specify)*

G.7 In case the Commission's proposed measure takes the form of a **diferentiated** export duty for scrap products classified under subheading **CN 7602 00**, at what levels should the export duty be set?

CN 7602 00	5%	10%	20%	30%	>30% (please specify)
CN 7602 00 11	☐	☐	☐	☐	☐
CN 7602 00 19	☐	☐	☐	☐	☐

G.9 In case the Commission's proposed measure takes the form of a **duty-free TRQ**, what would be the appropriate level of duty to set for out-of-quota exports?

- ☐ 10%
- ☐ 20%
- ☐ 30%
- ☐ 40%
- ☐ 50%
- ☒ other *(please specify)*

G.10 Please explain the reasons for your choice.

1000 character(s) maximum

Referring to our answer to G.3, we oppose any type of export restriction, including TRQ. We consider the questions G.11-18 inappropriately biased, and thus do not answer them.

G.11 In case of a **duty-free TRQ**, what should be the product scope for the TRQ?

Commission Implementing Regulation (EU) 2025/1926 of 23 September 2025 amending Annex I to Council Regulation (EEC) No 2658/87 on the tariff and statistical nomenclature and on the Common Customs Tariff

7602 00 11 Turnings, shavings, chips, milling waste, sawdust and filings; waste of coloured, coated or bonded sheets and foil, of a thickness (excluding any backing) not exceeding 0,2 mm)

7602 00 19 Other (including factory rejects)

7602 00 90 Scrap

- ☐ all products classified under subheading 7206 00 of the [EU Combined Nomenclature](#)
- ☐ only products classified under CN code 7206 00 90
- ☐ only products classified under CN codes 7602 00 11 and CN 7602 00 19
- ☐ another combination *(please specify)*

G.13 In case of a **duty-free TRQ**, what method should be used to calculate the volume of the TRQ?

- ☐ Use the average EU export volume between 2020-2024
- ☐ Use the average EU export volume between 2014-2019
- ☐ Determine the volume on the basis of EU demand in a given year (please indicate the data that should be used for this purpose)

- ☐ another method (*please specify*)

G.15 In case of a **duty-free TRQ**, what should be the preferred quota distribution method?

- ☐ a combination of country-specific and residual quotas open to all other destination countries
- ☐ global quotas, with a maximum cap per destination country
- ☐ global quotas without a maximum cap per destination country

G.17 In case of a **duty-free TRQ**, which method defining the measurement basis for TRQs do you think is most appropriate?

- ☐ annual
- ☐ quarterly
- ☐ other (*please specify*)

G.19 For how long should **any measure** that the Commission proposes be initially applicable?

- ☒ Not more than 2 years, with an option for renewal
- ☐ For 3 years, with an option for renewal
- ☐ For 5 years, with an option for renewal
- ☐ For more than 5 years, with an option for renewal

G.20 Please explain the reason for your choice.

1000 character(s) maximum

If the Commission against advice imposes any export restriction measure, we urge the measure to be as limited as possible.

G.21 Should **any measure** on aluminium scrap that the Commission proposes include a review clause that would permit the proposed measure to be adapted?

- ☒ Yes
- ☐ No

G.22 Please explain the reasoning behind your answer.

2000 character(s) maximum

Since any export restriction on recycled aluminium is bound to have a negative impact on the EU aluminium recycling, aluminium value chain and the circular economy, such measures have to be easily reversible. Without this option the recyclers will face a serious economic crisis, which will destroy jobs, close plants, reduce investment and ultimately hurt circular economy.

G.23 In your view, what are the key elements that should be part of a review clause?

- ☐ adapting the export duty levels
- ☐ adapting the TRQ volume
- ☐ adapting the out-of-quota duty level
- ☒ another element *(please specify)*

G.24 Which other element(s) should be included in the review clause?

2000 character(s) maximum

All the possible elements should be under review.

G.25 Which changing circumstances should prompt a decision to review the trade measure?

(Multiple options may be selected)

- ☐ decreasing/increasing demand
- ☐ decreasing/increasing availability of scrap generated within the EU
- ☐ decreasing/increasing exports
- ☐ decreasing/increasing use of scrap by the EU industry
- ☒ a combination of the above *(please specify)*
- ☐ another kind of changed circumstance *(please specify)*

G.26 Please explain the reasoning behind your answer.

If you selected the last response option (*another kind of changed circumstance*), what other kind(s) of development could prompt the need to review the trade measure?

500 character(s) maximum

The trade measure must be immediately cancelled, should any sign of negative impacts on the recycling sector be observed.

G.27 Should any measure that the Commission proposes on aluminium scrap include an emergency mechanism that allows for rapid adjustment of the measure in cases of urgency and unforeseen market developments?

- ☒ Yes
☐ No

G.28 Please explain the reason for your choice.

1000 character(s) maximum

The risks of the proposed measures are so obvious, that, as pointed out above (see G.26), once negative consequences of such measures on the recycling industry become apparent, it must be possible to immediately adjust and ultimately cancel such measures.

G.29 Are there any similar measures currently in place in third countries, which have an impact on the availability/prices of scrap for your operations?

If yes, please indicate which countries operates such measures, and what form do those measures take? What impact might a proliferation of such measures have on your business?

2000 character(s) maximum

EU should not compare its measures to the non-EU countries.
In countries with such measures the recyclers have stopped collecting, recycling and investing into recycling facilities because the value of circular materials has been artificially lowered by distorted market conditions. In EU this would cause even more serious damage, since EU is a global leader in recycling technologies.
Most of the countries with export restrictions on recycled metals are countries with a nascent waste management industry, unable to provide sufficient secondary raw materials, be it in terms of quantity and quality.

G.30 Are there any similar measures currently in place in third countries, which have an impact on the availability/prices of scrap for your operations?

- ☐ Yes
☒ No

G.32 Do you think that a proposed measure on aluminium scrap should be based on a different classification for aluminium scrap than that currently set out in sub-heading **7602 00** of the [EU Combined Nomenclature](#)?

Commission Implementing Regulation (EU) 2025/1926 of 23 September 2025 amending Annex I to Council Regulation (EEC) No 2658/87 on the tariff and statistical nomenclature and on the Common Customs Tariff

7602 00 11 Turnings, shavings, chips, milling waste, sawdust and filings; waste of coloured, coated or bonded sheets and foil, of a thickness (excluding any backing) not exceeding 0,2 mm)

7602 00 19 Other (including factory rejects)

7602 00 90 Scrap

☒ Yes

☐ No

G.33 Please explain the exact segmentation of types and grades of aluminium scrap that you would like to be used for implementation of any measure that the Commission may propose.

1000 character(s) maximum

The recycling segment must not be the only part of the value chain bearing regulatory constraints. Measures limited solely to aluminium scrap would be economically unbalanced and unfair. Restrictions are envisaged should be strictly mirrored to existing approaches in third countries (e.g.US), where measures focus on finished/semi-finished aluminium products, not exclusively on scrap. Restricting just scrap would distort competition by disadvantaging the recyclers, while leaving industries downstream free to import materials at world prices. This would effectively transfer value from the recycling industry to other segments of the value chain, without increasing effective availability of recycled aluminium.

Background Documents

[A European Steel and Metals Action Plan COM\(2025\) 125 F 19.03.2025](#)

[Call for Evidence: EU aluminium sector trade measure to ensure sufficient availability of aluminium scrap on the EU market](#)

[RESourceEU Action Plan COM\(2025\) 945 F 03.12.2025](#)

Contact

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