

Response to the European Commission's call for evidence on trade measure for aluminium scrap

Aluminium Denmark wishes to thank the European Commission for the opportunity to provide input regarding the consultation on possible EU trade measures for exports of aluminium scrap, with the aim of ensuring adequate availability on the EU internal market.

Aluminium Denmark is committed to securing competitive and predictable framework conditions for the Danish and European aluminium industry, with a particular focus on the green transition, international competitiveness, industrial resilience and resource efficiency.

Background

The aluminium industry in the EU faces a significant and growing export pressure on its aluminium scrap, driven by strong external demand from third countries with lower labour and environmental standards, combined with unfair subsidies and trade distortions.

This is actively diverting valuable secondary raw materials away from the EU at a time when domestic demand for low-carbon inputs and the imperative to increase the EU's economic resilience are accelerating.

General remarks

- Aluminium Denmark supports the objective of alleviating market imbalances and future-proofing access to strategic raw materials, including aluminium scrap.
- Any trade measure should be strictly proportionate, subject to clear and regular reviews, and preferably differentiated in scope and quality.
- Solutions must be legally robust, globally coordinated where possible, and provide clear environmental and business standards.
- Aluminium Denmark proposes an export duty of at least 30% on aluminium scrap applied erga omnes.
- Should an export duty not be implemented, Aluminium Denmark supports the introduction of tariff quotas applied erga omnes with proportional destination country-specific caps. The quotas should be set at average export volumes between 2014-2019, prior to the recent export surge.
- Aluminium Denmark recommends an ongoing review, ensuring that any intervention does not result in unintended side effects (such as excessive scrap stockpiling, black market activity, or distortion of trade).
- Policy must be designed to encourage investment in new sorting technology, recycling and closed-loop systems, with administrative burdens kept as low as possible.
- Measures must align with broader EU ambitions on circular economy, supply security and industrial competitiveness.

Specific remarks on the policy options

- Aluminium Denmark recommends that any export duty or fee is phased in gradually beginning with high-grade, mill-ready scrap critical for European production (such as UBCs and clean wrought scrap).

- The effect of any export restriction should be monitored closely. Aluminium Denmark notes that improved differentiation between aluminium scrap qualities would support more accurate monitoring of trade flows and suggests that CN 7602 codes should be upgraded and/or extended.
- Tariff rate quotas, if used as an alternative, must be temporary, transparent and subject to at least annual evaluation.
- Aluminium Denmark underlines that any trade measure on aluminium scrap should be coherent with the EU's climate, circular economy and industrial policy objectives including the principle of environmental reciprocity.
- Dialogue and alignment with Member States, relevant sectors, and European business organisations are essential to avoid negative effects on innovative Danish and European exporters.
- Aluminium Denmark notes that any trade measure should apply equally to EEA and EFTA partners and the UK, in line with existing EU frameworks.

Concluding remarks

Aluminium Denmark recognises that access to sustainable, strategic raw materials and a market-based approach to recycling is crucial for a successful and competitive green transition. We look forward to continued constructive engagement with the European Commission and all stakeholders, ensuring that any future action both strengthens the circular economy and underpins Europe's industrial strategy.

Yours sincerely,

Holger Wilcks
Association Manager
Aluminium Denmark