

From: [REDACTED] european-aluminium.eu>
Sent: 07 April 2021 09:25
To: [REDACTED] (CLIMA)
Cc: [REDACTED]
Subject: RE: Meeting request on EU Taxonomy Delegated act & definition of "sustainable aluminium": risk for the European aluminium value chain
Attachments: European Aluminium on TAXONOMY Delegated Regulation [comments to MSEG text] - March 2021_FINAL.pdf
Categories: Green Category

Dear [REDACTED],

Thank you for pointing us to your colleague [REDACTED] following the file in CLIMA.

I also copy in [REDACTED] in FISMA, with whom I realise we haven't yet shared our most recent paper (attached) on the latest text of the Delegated Act circulated with the MSEG last month.

We are extremely concerned and there is a lot of confusion among our membership on how these rules will be used by market participants and public authorities. I understand a Communication clarifying these aspects, together with the new non-financial reporting directive, will accompany the publication of the final delegated act ahead of the scrutiny period by the co-legislators.

So if not possible to arrange a meeting before the release on April 21st, we would very much appreciate an exchange at the later stage (once we analysed the Communication and rules of course). We will have our general spring meetings with our entire membership at the end of the month and the taxonomy is high on the agenda.

Thank you as always for your time, and we look forward to hearing from you.

Best,

[REDACTED]
/
[REDACTED]
[REDACTED]





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From: [REDACTED]

Sent: Tuesday, 30 March 2021 11:13

To: [REDACTED]

Subject: RE: Meeting request on EU Taxonomy Delegated act & definition of "sustainable aluminium": risk for the European aluminium value chain

Dear [REDACTED]

Thank you for reaching out – I don't deal with taxonomy. My colleague [REDACTED] in copy is the responsible head of unit, but as you know DG FISMA is in the lead

Kind regards

[REDACTED]

[REDACTED]



European Commission

[REDACTED]

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From: [REDACTED] [european-aluminium.eu](mailto:europa@european-aluminium.eu)>

Sent: Tuesday, March 30, 2021 11:00 AM

To: [REDACTED]

[REDACTED]
Subject: Meeting request on EU Taxonomy Delegated act & definition of "sustainable aluminium": risk for the European aluminium value chain

Dear [REDACTED]

On behalf of the European aluminium industry, we would like to share our strong concerns on the latest proposals by the European Commission on the draft Sustainable Finance Regulation with the technical screening criteria for the climate mitigation and adaptation objectives, circulated for Member States comment in the MSEG.

As explained in our paper attached, these proposals represent **one step backwards to the original draft text went to public consultation last November** to which we responded [here](#).

As explained on several occasions to the Commission services and the Member States, the average of the best 10% smelters must not be the main criteria deciding which primary aluminium smelter in Europe can qualify to the framework. Establishing the single direct emission threshold as the mandatory criteria is not the correct approach to evaluate the sustainability of aluminium production, as the main CO2 footprint differentiator between installations is the indirect emissions, due to high electricity consumption in the production process. Paradoxically, not even the most efficient and based on carbon-free electricity smelters in Europe would qualify, thus impacting their competitiveness vis à vis international producers, often with significantly higher carbon footprint and no carbon costs.

The previous proposals released for public consultation last November represented a better solution. They allowed for some flexibility combining the efficiency of the process and the energy source. The use of a combined threshold better reflected the electricity-intensive nature of our processes and the technologically improvements today available.

We would very much appreciate to discuss these aspects in a call at your best convenience we can explain why we believe the draft rules have the potential to hinder future green investments and thus decarbonisation efforts of the primary aluminium value chain in Europe.

Awaiting for your kind reply, please do not hesitate to get in touch should you have any additional queries on the above.

All the best,

[REDACTED]

/ [REDACTED]



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