

Open letter by Energy Intensive Industries CEOs on ETS and CBAM

Industry's climate neutrality transition pathways need a predictable and enabling policy framework rather than abrupt step changes

As leaders of energy intensive industries based in Europe, we are writing jointly to express our concerns over recent developments for the cornerstone policy of the Emissions Trading System (ETS) and the planned introduction of the Carbon Border Adjustment Mechanism (CBAM).

To be clear, we support the objectives of the European Green Deal and our companies are taking concrete actions across several technological pathways to deliver deep emission reductions and climate neutrality by 2050. The sectors within which we operate provide direct employment to around 2.6 million people and provide the interlinked foundations of strategic value chains for the EU economy and society.

Our businesses have to plan investments to deliver our energy transition, not only within the Single Market, but also within the global context where Europe's climate ambition and carbon pricing is much stronger than other regions, whose industry we have to compete with.

Achieving the EU 2030 and 2050 climate change targets needs unprecedented investments, with a clear business case for every project. To deliver these, companies require a facilitating regulatory framework that provides a high degree of predictability and legal certainty, most notably in the following areas:

- ✓ Secure and competitive access to sustainable energy and feedstocks with a strong focus on increasing the independence from third-country supplies;
- ✓ Financing support to research, development and upscale of breakthrough technologies through a frontloading of financing for ready-to-go first-of-a-kind projects;
- ✓ Focus on material and technology neutral policies to develop lead markets for climate neutral products bridging the initial cost gap with conventional ones.
- ✓ Effective measures levelling the playing field with international competition where their home markets do not share the same climate ambition.

Legislation needs to accompany this transition with predictable measures and realistic timelines. Step changes risk overburdening companies before they can implement the necessary investments and develop the markets for low carbon products. In this regard, latest proposals on ETS and CBAM weaken carbon leakage provisions, further increase unilateral regulatory costs and harm the competitiveness of European industries in EU or international markets.

Instead, higher climate ambition needs to be achieved cost effectively and be accompanied by strengthened carbon leakage protection on EU and export markets against both direct and indirect carbon costs. This was also the primary rationale of the Green Deal – which we share – but the changed geopolitical environment and its impact on the cost base of industry have added to the urgency.

The overall objective should be to make Europe more attractive for investments that can secure high quality jobs and contribute to a successful transition to climate neutrality.

Ahead of the final decisions on ETS and CBAM in the Environment Council and the Plenary of the European Parliament, we call on policy makers to consider these elements and urge you to support a coherent and realistic approach to climate protection and EU industrial leadership.

Bruno Jacquemin, Délégué Général, A3M

Stéphane Delpeyroux, President, A3M

Bernardo Velazquez, CEO, Acerinox

Karl-Ulrich Köhler, Chairman of the Board of Management, AG Dilinger

Rodolfo Abrantes, CEO, Aleluia Ceramicas

Gheorghe Dobra, Director General, ALRO S.A.

Guillaume de Goÿs, CEO, Aluminium Dunkerque

Gerald Mayer, CEO of AMAG Austria Metall AG

Jorge Aladro Vico – Director General, Ancade, Asociación Nacional de Fabricantes de Cales

Maite Serra, Secretary General, Anfasesa (Spanish Association of Ceramic Sanitaryware Manufacturers)

Alexis Van Maercke, Secretary General, APEAL

Timoteo Di Maulo, CEO, APERAM SA

Albertina Sequeira, Director General, APICER - Associação Portuguesa das Indústrias Cerâmica e da Cristalaria

Geert Van Poelvoorde, CEO, ArcelorMittal Europe

René Fabík, CEO, ArcelorMittal Tubular products Karviná

Henrique Barros, Chief Executive Officer and Administrator, ARCH Valadares

Michał Jarczyński, CEO, Arctic Paper Group

Johnny Bultheel, co-CEO, Argex

Mario Caldonazzo, CEO, Arvedi

Vicente Manuel Nomdedu Lluesma, President, ASCER - la Asociación Española de Fabricantes de Azulejos y Pavimentos Cerámicos

Christoph René Holler, Director General, Association of the Ceramic Industry e. V. (VKI)

Orazio Zoccolan, Director, Assomet - Italian Non-Ferrous Metals Association

Carlos Navalpotro, President, Asturiana de Zinc SAU

Roland Harings, CEO, Aurubis AG

Roman Stiftner, Managing Director, Austrian Mining and Steel Association and the Austrian Non-Ferrous Metals Association

Harri Kiiski, CEO, Azomures

Jose Óscar Bachero Balaguer, Presidente Consejo Administración, Azulejos El Mijares

Sandra Santos, CEO, BA GLASS

Markus Menges and Florian Glück, Managing Directors, Badische Stahlwerke GmbH

José Martínez Pérez, Director General, Baiceram S.L.

Philippe Coigne, Director General, Belgian Steel Federation

Christian Wiethüchter, CSO/COO, Benteler

Mikael Staffas, President and CEO of Boliden and President of Eurometaux

Carlos Hernández Puente, Director General, Bmi Roofing Systems S.L.U.

Vincenzo Di Giuseppantonio, Direttore Generale, Bormioli Luigi

Konstantin Stamenov, Managing Board Chairman, Bulgarian Federation of Industrial Energy Consumers (BFIEC)

Andreas Steinbüchler Steinbuchler, General Manager, Borealis L.A.T. GmbH and President of Fertilizers Europe

Roland Besnard, Chairman & CEO, Bouyer Leroux

Ignazio Capuano, CEO, Burgo Group

Jon Santa Cruz – CEO, Calcinor

Tim Van den Bossche – CEO Europe, Carmeuse

Lorenzo Poli, CEO, Cartiere Saci SpA

Marco Mensink, Director General, CEFIC

Francesc Rubiralta Rubio, Chairman and CEO, CELSA Group

Koen Copenholle, Chief Executive Officer, CEMBUREAU

Isidoro Miranda, CEO, LafargeHolcim Spain and CEMBUREAU President, CEMBUREAU

Jori Ringman, Director General, Confederation of European Paper Industries (CEPI)

Raul Magalhães, Administrator, Ceragni Lda e CERTECA [Indústrias Cerâmicas S.A]

Renaud Batier, Director General, Cerame-Unie

Francisco Javier Sánchez Sánchez, Director General, Cerámica Chinchilla

Humberto Martínez Muñoz, Director General, Ceramica De La Estanca S.A.

Francisco Antonio Rodríguez Moreno, Director General, Ceramica Elu S.L.

Pedro Santiago, Manager, Cerâmica F. Santiago

Ángel Farreny Vilamajo, Director General, Ceramica Farreny S.A.

Josep Fuste Zamora, Director General, Ceramica Fuste S.A.

José Garrido De Castro, Director General, Ceramica Gayga S.L.

Francisco Manuel Hernández Sánchez, Director General, Ceramica Hermanos Hernandez S.A.

Lorenzo García Anula, Director General, Ceramica La Andaluza De Bailen S.L.

Sebastián Mola Pallas, Director General, Ceramica La Coma S.A.

Francisco Noé Román Pellín, Director General, Ceramica La Escandella S.A.

Concha Gómez Pérez, Director General, Ceramica La Manchica S.L.

Francisco Antonio Rodríguez Moreno, Director General, Ceramica La Paloma S.L.

Ramón Lerma Herrera, Director General, Ceramica La Union S.L.

Osmundo Barrios Pérez, Director General, Ceramica Las Losas S.L.

Edesio C. Fernández, Director General, Ceramica Malpesa S.A.

María Luisa Martín Lozano, Director General, Ceramica Marlo S.A.

Paco Mateo, Director General, Ceramica Mateo S.L.

Vicente Mayor Roig, Director General, Ceramica Mayor S.A.

Juan Carlos Millas Fernández-Marcote, Director General, Ceramica Millas Hijos S.A.

María Inmaculada Pastrana Gálvez, Director General, Ceramica Pastrana S.A.

Raúl Peño Muñoz, Director General, Ceramica Peño S.L.

Agustín Morera Guma, Director General, Ceramica Piera S.L.

Agustin Morera Guma, Director General, Ceramica Pierola S.L.

José Luis Lanuza Quilez, Presidente, Cerámica Saloni SAU

Juan José Simón Navajas, Director General, Ceramica Tudelana S.A.

Jon Igoa, Director General, Ceramica Utzubar S.A.

Enrique Vázquez Fidalgo, Director General, Ceramica Zaratán S.A.

Ismael Alonso Momparler, Director General, Ceramicas Alonso S.L.

Juan Lladó Casanovas, Director General, Ceramicas Calaf S.A.

Luisa Pérez Cuenca, Director General, Ceramicas De Mira S.L.

Gabriel Castro Quiles, Director General, Ceramicas Jornet S.A.

Fernando Jerez Alonso, Director General, Ceramicas Saza S.A.

Luis Miguel Valera Ibañez, Director General, Ceramicas Valera S.A.

Piotr Tokarski, President of the Management Board, Ceramika Paradyż Ltd

Juan Carlos Morant Vicedo, Director General, Ceramosa S.L.

Jose Óscar Bachero Balaguer, Presidente Consejo Administración, Cerlat S.A.

Nicola Giombini, CEO, Ceramica Polcolorit

Nuño Arroyo, CEO, Cermer

Rogério Oliveira, Chairman of the Board of Directors, Cetipal

Raul Carnicer Vivas, Director General, Cevica S.L.

Xavier Aymerich Bardolet, Director General, Comercial Aymerich S.A.

Gilbert RICCI President, Confédération Des Industries Céramiques De France

Manuel Angel Murillo Fernández, CEO, Colorker S.A

Giovanni Savorani, President of Confindustria Ceramica, (on behalf of 86 companies - full list available here)

Julio Martin Mancera, Administrador, Cosentino Industrial S.A.U.

Markus Steilemann, CEO, Covestro

Carlos Lamarosa, Plant Manager, Crisal Cristalaria automática SA

José Coelho, Chairman of the Board of Directors, CS -, Coelho da Silva SA

Eduardo Pascoal, Plant Manager and Industrial Manager Portugal, CT- Cobert Telhas S.A. - BMI Group

Gitte Krusholm Nielsen, Managing Director / CEO, Danske Tegl

Martin Zahlbruckner, CEO, delfort

Thomas Kaczmarek, Managing Director, Deutsche Feuerfest-Industrie e.V. (DFFI)

Luis Dobón Curto, Director General, Dobon Y Cia S.A.

Neil Carr, President, DOW Europe, Middle East Africa and India

Petr Bláha, CEO, Duslo a.s.

Pascal Casanova, CEO, Edilians

Andreas Christensen, Managing Director / CEO, Egernsund Wienerberger

Helge Aasen, CEO, Elkem ASA

Christoph Schneider, Managing Director, Elektrowerk Weisweiler GmbH

Miquel-Àngel Munar, Senior Managing Director, EMEA Bathroom Products, ROCA SANITARIO S.A.

Jacobo Campo, Director General, Epifanio Campo S.L.

Francois Michalet, Secretary General, ESTA

Ismael Carne Sales, CEO, Estudio Cerámico S.

Rodolphe Nicolle – Secretary General, EuLA, The European Lime association

Burkhard Naffin – CEO, Fels and President of EuLA, EuLA

Ines Inès Van Lierde, Secretary General, Euroalliages

Felipe Camacho Merino, Director General, Euroatomizado

Axel Eggert, Director General, EUROFER

Guy Thiran, Director General, EUROMETAUX

Paul Voss, Director General, European Aluminium

Thomas Kaczmarek, Managing Director, European Center of Refractories gGmbH (ECREF)

Bernard Respaut, Chief Executive, European Copper Institute

Christian Kullmann, Chairman of the Executive Board, Evonik Industries AG

Rolf Kuby, Director General, Euromines

Javier Ten, Director General, Exagres S.A.

Mara Caboara, Secretary General, EXCA

José Aragón González, Director General, Fabricacion De Ladrillos A.G.-2 S.L.

Juan Luis Carda Usó, Director General, Fabricacion Española Sanitaria Sa

Sylvia Hofinger, Director General, FCIO (Austrian chemical industry federation)

Stefan Jungk, President, Federal Association of the German Brick and Roof Tile Industry

Stein Lier-Hansen, Managing Director, Federation of Norwegian Industries

Ivan Souček, Director, Federation of the Chemical Industry of Czech Republic

Isabelle Dorgeret, Director General, Fédération Française des tuiles et briques

Michel Calozet, CEO, FEDIEX - Fédération belge de l'industrie extractive et transformatrice de roches non combustibles

Juan Labat, Director General, Feique (Spanish chemical industry federation)

Marco Levi, CEO, Ferroglobe

Jacob B. Hansen, Director General, Fertilizers Europe

John Cooper, Director General, Fuels Europe

Alexander Becker, CEO, GMH Gruppe

Svend Jepsen, Managing Director / CEO, Gørding Klinker

Toker Ozcan, CEO, Green Steel EMEA Liberty Steel Group

Francisco Antonio Rodríguez Moreno, Director General, Gres Acueducto S.A.

José Manuel Saldaña Oliete, Director General, Gres Aragón S.A.

Paco Mateo, Director General, Gres De Alloza S.A.

Jorge Peris Colon, Director General, Gres De Andorra S.L.U.

Orlando Oliveira, Administrator, GRESART - Cerâmica Industrial SA

Luis Hernández Sanchis, Consejero Delegado, Grespania

Grzegorz Kądziałowski, Vice-President of the Management Board, Grupa Azoty S.A.

Javier Goñi del Cacho, President & CEO, GrupoFertiberia

Francois Brendel, CEO, Halcon Ceramicas S.L.U.

Juan Sampedro Bastida, Director General, Herederos Ceramica Sampedro S.A

José Miguel Segura, Director General, Hijos de Francisco Gaya Forés

Francisco José Morant Vicedo, Director General, Hijos De Francisco Morant S.L.

Francisco Javier Castelló , CEO , Hijos de Cipriano Castelló Alfonso, S. L.

Elena Santiago Monedero, Secretary General, Hispalyt

András Turi, President, Hungarian Association of Ceramic Industry (HACI)

Peter Claes, President, IFIEC Europe

Evgeny Tankhilevic, CEO, ISD Dunafer Danube Ironworks Private Company Limited by Shares

Xavier Culleré Guasch, Director General, Industrial Cerámica Belianes S.L.

Vicente López Díez, Director Gerente, Industrias Alcorenses Confederadas S.A.

Loriano Bocini, President, Industrie Bitossi Spa.

Rob Ingram, CEO O&P, INEOS

Luc van Opstal, Site Manager Lillo & Zandvliet, Inovyn Manufactur Be

Philippe Taranti , Site Manager and Operations Manager Belgium & Germany, Inovyn Manufactur Be

Howard Winbow, Director European Affairs, International Zinc Association

Jonas Hagelqvist, Director General, IKEM - Innovation and Chemical Industries in Sweden

Ángel Juarez Juarez, Director General, JUAREZ HERMANOS S.L.

Gregorio Juarez Sardinero, Director General, JUAREZ Y MILLAS S.A.

Nicola Giombini, CEO, KAI Group

Theodora Kouloura, COO, KAVALA FERTILIZERS LTD

Mika Aalto, Director General, Kemianteollisuus (Finnish chemical industry federation)

José Luis Lanuza Quilez, CEO, Keraben Grupo

Joaquin Emilio Martí Segarra, CEO, Keros Cerámica S.L.

Fernando Jerez Alonso, Director General, Klinker Covadonga S.L.

Francisco Antonio Rodríguez Moreno, Director General, Klinker Seg. S.L.

Russner Carsten, Managing Director, Kyocera Fineceramics Precision GmbH

José Antonio Cascales Anton, Director General, La Ladrillera Murciana S.A.

Manuel Gayet Mallol, Consejero Delegado, La Platera S.A.

Bernardo Castor Llull, Director General, Ladrilleras Mallorquinas S.A.

Javier Tormo Beneyto, Director General, Ladrillos La Bastida S.L.U.

Pablo García-Fogeda Nuñez, Director General, Ladrillos Mora S.L.

Matthias Zachert, CEO, Lanxess

Roman Blažíček, CEO, LASSELSBERGER, s.r.o.

Cedric de Vicq – CEO Europe, Lhoist

Jurgen Tuffner, CEO, Liapor

Radomír Věk, Vice chairman of BoD, COO Lovochemie, a.s.

Ramiro Flor Garcés, Consejero delegado, Manufactura Industrial Azulejera S.L.

Markus Ritter, CEO, Marienhütte GmbH

Peter Matzen, Managing Director/CEO, Matzen Tegl

Francisco Manuel Hernández Sánchez, Director General, Mazarron Tejas S.L.

Francisco Manuel Hernández Sánchez, Director General, Mazarron Termoarcilla S.L.

Ilkka Hämäla, President and CEO, Metsä Group

Jozsef Molnar, CEO, MOL Group

Iskren Nikolov, CEO, Monbat Recycling EAD

Viola Ferrario, Président, Monier - BMI Group

Evangelos Mytilineos, Chairman and CEO, MYTILINEOS S.A.

Veronique Steukers, Global Director Public Policy, Nickel Institute

Rainer Wahlers, Managing Director, Nordenhamer Zinkhütte and Nordenham Metall

Paul Gustavsson – CEO, Nordkalk

Hilde Merete Aasheim, President and CEO of Norsk Hydro

Stein Lier-Hansen, Managing Director, Norsk Industri - Federation of Norwegian Industries

Sven Ombudstvedt, CEO, Norske Skog

Guido Janssen, Vice President European Operations, Nyrstar

Branislav Klocok, Generálny riaditeľ / General Director, OFZ a.s.

Alfred Stern, CEO, OMV

Heikki Malinen, President and CEO, Outokumpu

Rúnar Sigurpálsson, CEO, PCC Bakki Silicon

Josep Palau Casañé, Director General, Palau Ceramica De Almacellas S.A.

Alfredo Camps Palau, Director General, Palau Ceramica De Alpícat S.A.

Fernando Palau Rodríguez, Director General, Palau Tecnologia Ceramica S.L.

Jose Diogo, Chairman of the Board of Directors, Pavigrés Cerâmicas S.A.

Marcos Gaya Fuentes, Director Gerente, PERONDA GROUP, S.A.

Davor Žmegač, CEO, Petrokemija d.d. Kutina

Maxime Busschaert, Managing Director, Ploegsteert

Ferdynand Gacki, President of the Management Board, Polish Ceramic Union

Stefan Dzienniak, President of the Board, Polish Steel Association

Aleksander Szyszko – Board Member, Polish Lime Association (PLA)

Jarkko Partinen, Director, Pori Metso Outotec Finland Oy Research Centre

Davide Garofalo, CEO, Portovesme s.r.l.

Panagiotis Agapiou, President and legal representative, PFIC LTD

Pascal Bombard, Technical Manager, Pousseur SAS

Paulo Almeida, Advisor to the Board of Directors, Primus Ceramics

Ignacio Díaz Barroso, Director General, Proceran S.A.

Pablo García Fogeda Núñez, Director General, Productos Ceramicos Mora S.L.

Leopold Povse, CFO, Radeče papir nova

Thomas Piper, Managing Director/CEO, Randers Tegl

Michele Bianchi, CEO, RDM Group

Mirosław Wilczek, CEO, REAlloys Sp. Z o.o.

Camilo Rodiño Santos, Director General, Refractarios Campo S.L.

Rainer Gaebel, Managing Director (Sales and R&D), Refratechnik Holding GmbH

Luis Cabra, Deputy CEO Repsol & President Fuels Europe

Stefan Borgas, CEO, RHI Magnesita

Antonio Gálvez Pinelo, Director General, Refractarios Andalucia S.L.

Jorge Vieira, Managing Director, Roca Sa

Ivo Würzner, Managing Director, Rodruza B.V.

Frank Spikker, CEO, Royal Mosa

Paco Mateo, Director General, Rusticos La Mancha S.A.

Gunnar Groebler, CEO, Salzgitter AG

Paulo Moreira dos Santos, Managing Director, SANITANA [Fábricas de Sanitários de Anadia S.A]

Andreas Kinnen - President Marketing & Sales, SCHAEFER KALK and Board member of BVK, Bundesverband der deutschen kalkindustrie

Dario Scaffardi, CEO & General Manager, Saras

Katerina Spinoula, Director, SEVK Association of Greek Clay Industries

Richard Stansfield – CEO, Singleton Birch

Laurent Zuber, CCO/General Manager, SGD Pharma

Antonio Linares Noguera, SMD Laufen Bathrooms & CNEE Division Roca Group, Executive Board Roca Group

José Dias Vieira, Administrator, Soladrilho SA

Ilham Kadri, CEO, Solvay

Tomasz Bilinski, President, SPMO (Polish Association of Refractory Producers)

Olavi Huhtala, CEO, SSAB Europe Oy

Tillmann Blaschke, CEO, Staatliche Porzellan-Manufaktur Meissen GmbH.

Georg Feith, CEO, Stoelzle Glass Group

Ivan Jurkosek, General Manager, Store Steel

Rudi Sluiter, Director General, B.V. Steenfabriek Huissenswaard

Joachim Strøjer Hansen, Managing Director /CEO, Strøjer Tegl

Eduardo Aparici Monfort, Director General, Superceramica Terrabrick S.L.

Maria Sunér, CEO, Svemin

Marko Drobnič, President of the Board, TALUM d.d. Kidričevo

Gregorio Juarez Sardinero, Director General, TABICESA S.A.U.

Pablo Casanova Ramón Borja, Director General, Tejas Borja S.A.U

Luis Vereá Vázquez, Director General, Tejas Vereá S.A.

Laurent Musy, CEO, Terreal

Albert Rovira Cateura, Director General, Terreal España De Ceramicas S.A.U.

Antonio Redondo, CEO, The Navigator Company

Mihály Felegyi, President, Tiles & Bricks Hungary

Bernhard Osburg, CEO, Thyssenkrupp Steel Europe AG

José María González Lacomba, Director General, Todagres S.A.

Juan Torres Padilla, Director General, Torres Padilla S.L.

Philipp Schlüter, CEO, TRIMET Aluminium

Jan Czudek, CEO, Třinecké železářny

Henrik Adam, Chairman of the Board, TSNH

Miquel Piñol i Vilamajó, Director General, TEULERIA ALMENAR S.A. (TEALSA)

Nicolas de Warren, President, UNIDEN

Luigi Gnecci – Member of the board of directors, Unicalce

Ionel Bors, President, UniRomSider – Romanian Steel Producers' Union

James E. Bruno, President, US Steel Košice

Wouter Vermijs, CEO, Utility Support Group (USG)

Johan Svensson, Managing Director, Vargön Alloys AB

Thomas Riou, CEO, Verescence

Patrick Andre, CEO, Vesuvius Plc

Markus Warncke, CFO, Villeroy & Boch AG

Teodorico Pais, Administrator, Vista Alegre Atlantis

Radek Strouhal, CEO, Vítkovice Steel

Hubert Zajicek, CEO, Voestalpine Stahl GmbH

Alejandro Seco Barragán, CEO, Xallas Electricidad y Aleaciones, S.A.U.

Bernardo Velazquez, President, UNESID (Asociación de las empresas productoras de acero y de productos de primera transformación del acero de España)

Jan Philipp Spang, CEO, Westerwälder Blumentopf-Fabrik Spang GmbH & Co. KG

Oliver Wiegand, Geschäftsführer, Wiegand Glass

Jasper Vos, Director Operations, Wienerberger B.V.

Caroline Van de Velde, CEO, Wienerberger Belgium

Heimo Scheuch, CEO, Wienerberger AG

Franziska Erdle, Director General, Wirtschaftsvereinigung Metalle e.V

Hans Jürgen Kerkhoff, President, Wirtschaftsvereinigung Stahl

Vasilios Gounaris, CEO, XALKIS SA [Vavouliotis – Gounaris-Mitakis Bricks & Tiles Industry SA]