

JULY 2025

To:

Ms. Ursula von der Leyen, President of the European Commission

Mr. Maroš Šefčovič, Commissioner for Trade and Economic Security

Dear President von der Leyen and Commissioner Šefčovič,

Eurometaux, the European Non-Ferrous Metals (NFM) association, calls on the European Commission to find a mutually beneficial agreement with the US that will remove all unnecessary trade barriers between the two blocs and avoid the imposition of additional retaliatory measures - ahead of the upcoming deadline of the reciprocal tariffs pause extended to August 1<sup>st</sup>.

The EU and the US have the world's largest bilateral trade relationship, built on free, fair and rules-based trade. Particularly, the EU-US NFM supply chains are very much interconnected, and any trade barriers will negatively disrupt the EU metal industry. The EU NFM industry is critical for Europe's green and digital transition, as well as for its defence ambition, since these policy goals all require higher volumes of metals and minerals.

The imposition of the US so-called "reciprocal tariffs" and the increase of the Section 232 tariff on US steel and aluminium imports to 50% affect both directly and indirectly the EU market and put at risk different segments of the EU NFM supply chain. Additionally, the EU rebalancing measures, as currently drafted, will inflict irreparable damage to crucial value chains of the NFM industry.

Particularly, the EU countermeasures hit many vital raw materials that are strategically important for the EU's industries and cannot be fully substituted by other suppliers, such as Copper (and associated co-products, e.g. Tin) and Precious Metals, namely Gold, Silver and Platinum Group Metals (PGMs). Moreover, the proposed import tariffs on US electronic and battery waste products can severely weaken the EU recycling of non-ferrous metals and go against the policy objectives of the circular economy. The US is still one of the few countries from which these materials can be imported with relative ease, even under the new regulatory framework.

We therefore call on the European Commission to reconsider these lists, taking into account our industry's comments to avoid further economic harm and dependencies being created in the EU. We believe that the EU countermeasures must be designed based on their potential to provide relief to sector-specific vulnerabilities, including with regard to critical and strategic raw materials to preserve the objectives of the Critical Raw Materials Act.

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For these reasons, Eurometaux strongly urges the European Commission to exclude from the EU lists of potential import tariffs in response to the unwarranted US tariffs, if an agreement is not reached, the following non-ferrous metals and electronic and battery waste products:

- **Copper ores and concentrates (CN 2603)**
- **Precious Metals, such as Gold, Silver and Platinum Group Metals (CN 7106/10/15/17 & 8215)**
- **Scrap and waste of aluminium (CN 7602)**
- **Supported catalysts with precious metal (CN 3815)**
- **Silver oxide cells and batteries (CN 8506)**
- **Electrical and electronic waste and scrap (CN 8549)**

While aluminium waste and scrap must be removed from the list of import tariffs, we support the introduction of these products on the possible list of EU export restrictions to reduce scrap leakage out of Europe.

It is essential that the EU-US strategic alliance is preserved and further strengthened at a time of economic hardship that requires intense cooperation between the two partners. The EU must therefore bolster its industrial competitiveness with particular attention to the NFM industry, which is already under pressure from excessive energy costs and global overcapacity.

An effective and balanced solution that normalises the EU-US trade relations and addresses the real root causes of the problem – including Chinese overcapacities - is imperative to advance more effective global trade rules that can reduce growing unilateral actions and unfair practices affecting our multilateral rules-based trading system.

Yours sincerely,



Dr James Watson

Director General of Eurometaux