

STEERED CONSULTATION INSTEAD OF AN OPEN HEARING: VDM, BDSV AND BVSE WARN AGAINST EU INITIATIVE ON ALUMINIUM SCRAP

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Associations caution against leading questions, unrealistic price assumptions and politically pre-determined outcomes

The European Commission has launched a public consultation on the initiative *“EU aluminium sector – trade measures to ensure sufficient availability of aluminium scrap on the EU market.”*

The aim is to gather feedback from across the value chain on possible trade-related measures.

However, the **German Metal Traders and Recyclers Association (VDM)**, the **German Steel Recycling Association (BDSV)** and the **Federal Association for Secondary Raw Materials and Waste Management (bvse)** view the consultation critically. In the view of the three associations, the structure and logic of the questionnaire are designed in a way that prevents it from reflecting the real market and recycling realities.

“A consultation should be open-ended. This one is not,” says **VDM President Murta Bayram**. “Key questions are based on price and market assumptions that are not supported by the day-to-day business reality of our companies. If the underlying assumptions are wrong, the conclusions drawn from them will be wrong as well.”

The associations are particularly critical of the questionnaire’s structure. Many questions implicitly assume trade policy interventions – such as export restrictions or minimum tariffs – without allowing respondents to fundamentally reject such instruments. Alternative market-based perspectives, including the importance of international material flows and the role of exports as a stabilising factor, are

insufficiently taken into account.

“This creates the impression that the consultation is less about gathering views and more about preparing a specific political outcome,” warns **BDSV President Andreas Schwenter**. “This is not a neutral consultation process and carries the risk of one-sided political legitimisation.”

bvse President Henry Forster also underlines the broader implications: “The recycling industry depends on functioning markets, competition and open material flows. A consultation that methodologically ignores this reality puts investments, medium-sized business structures and ultimately the goals of the circular economy and climate protection at risk.”

VDM, BDSV and bvse point out that recycling already makes a substantial contribution to Europe’s raw material security. Political decisions based on distorted assumptions could weaken this contribution rather than strengthen it.

“Precisely because this consultation shows methodological weaknesses, broad participation from industry practice is essential,” Bayram, Schwenter and Forster agree. “Only in this way can political decisions based on a distorted data foundation be prevented.”

The European Commission has explicitly provided the option to submit **independent written statements** to the consultation, regardless of the questionnaire. From the perspective of VDM, BDSV and bvse, this is the crucial channel to correct false assumptions and present a realistic market perspective.

Companies, associations and market participants are therefore encouraged to actively participate **by 31 January 2026** and clearly state:

- that the underlying price and market assumptions do not reflect reality;
- that export restrictions are not a solution but pose a risk to functioning recycling markets; and
- that open markets and international material flows are a fundamental prerequisite for investment, climate protection and supply security.

Statements can be submitted directly via the European Commission’s consultation portal. Informal written submissions are explicitly permitted and may also be

submitted in German.

VDM, BDSV and bvse are available to support stakeholders with questions regarding registration and the submission of statements.