

TMF's comments on the proposed EU trade measure on aluminium scrap

The Swedish Federation of Wood and Furniture Industry (Trä- och Möbelföretagen, TMF) welcomes the opportunity to comment on the European Commission's targeted consultation on possible EU trade measures aimed at securing sufficient availability of aluminium scrap on the EU market.

TMF wants to express general concerns regarding the use of export restrictions as a trade policy instrument. Open and well-functioning markets remain essential for competitiveness, innovation and resilience across European manufacturing value chains. Trade-restrictive measures should therefore be exceptional, clearly justified and proportionate, and only considered where less distortive alternatives are demonstrably insufficient.

Although the furniture and building component manufacturers industries is not a primary producer of aluminium, the sector is a downstream user that relies on aluminium for frames, fittings, mechanisms, profiles and design elements. Many manufacturers operate in a dual role within the aluminium value chain: they rely on aluminium inputs, while at the same time supplying high-quality production scrap back upstream to recyclers and remelters. Well-functioning scrap markets are therefore essential for both material supply and circularity.

Measures that risk increasing material prices, reducing market liquidity or fragmenting value chains would have direct cost implications for furniture and building component manufacturers, many of which are SMEs operating under strong competitive pressure and limited pricing power.

TMF is also concerned that export restrictions on aluminium scrap could undermine efficient circular material flows. Furniture and building component manufacturers increasingly depend on predictable access to recycled and low-carbon materials to meet sustainability requirements and customer expectations. Fragmenting international scrap markets risks reducing recycling efficiency, weakening incentives for cross-border circular value chains and increasing overall system costs, which would run counter to EU circular economy objectives.



Given the potentially wide-ranging effects across the value chain, TMF underlines the importance of a robust and transparent impact assessment. It must be clearly demonstrated that export restrictions would, in practice, lead to increased availability of aluminium scrap within the EU, and that any such benefits would outweigh negative impacts on downstream industries, recyclers, investment incentives and overall market efficiency. Assumptions about causality should be supported by evidence, including analysis of price effects, trade diversion and behavioural responses.

TMF recognises the challenging geopolitical and economic context and the legitimacy of concerns related to resilience and security of supply. However, strengthening access to raw materials and supporting circularity within Europe should primarily rely on predictable regulation, improved internal market functioning, investment in recycling capacity and innovation, and the effective use of existing trade defence instruments to address unfair subsidies. Trade-restrictive measures should remain a last resort, temporary in nature, and subject to clear review mechanisms.

TMF therefore encourages the Commission to carefully consider the broader downstream and circular economy impacts before advancing any legislative initiative.