

First Omnibus Simplification Package

Eurometaux's Position Paper

I. Introduction

Eurometaux, the European non-ferrous metal association, welcomes the European Commission's ("Commission") proposal for the **First Omnibus Simplification Package**, which includes targeted amendments to the **Corporate Sustainability Due Diligence Directive (CS3D)**, the **Corporate Sustainability Reporting Directive (CSRD)**, and the **EU Taxonomy Regulation**.

We view this proposal as a positive step towards reducing disproportionate regulatory burdens, as well as administrative and compliance costs for businesses operating within the EU. The recent fast-tracked adoption of the postponement proposal of the CS3D and CSRD application dates is also a positive development. It will help ensure legal certainty for European businesses and allocate sufficient time and resources for the effective implementation of the Omnibus changes.

We believe that an ambitious and consistent simplification of regulatory and reporting requirements will prove essential to achieving resilient, ethical, and sustainable raw materials' supply chains, crucial to the green and digital transition. It is also key to safeguarding the competitiveness of the European industry.

Our sector has a long experience in using voluntary sustainability and due diligence standards — such as the **Copper, Zinc, Molybdenum and Nickel Mark**¹, the **Aluminium Stewardship Initiative**², the **Initiative for Responsible Mining Assurance (IRMA)**³, the **LBMA Responsible Gold Guidance**⁴, **ICMM's Performance Expectations**⁵, and the **Responsible Mining Initiative (RMI)**⁶ — to promote responsible practices and transparency across the entire value chain. Recognising the important role of these standards provides a strong foundation for achieving the objectives of the EU's due diligence legislation.

To be effective, the first Omnibus must establish a workable, harmonised and proportionate risk-based approach to human rights and environmental due diligence, address the overlapping requirements in the broader horizontal due diligence framework and ensure a harmonised transposition across Member States to secure the level playing field of European companies.

Achieving this will require ongoing engagement with key stakeholders at every stage of the process.

¹ The Copper Mark ([link](#)), the Zinc Mark ([link](#)), the Molybdenum Mark ([link](#)), and the Nickel Mark ([link](#)).

² The Aluminium Stewardship Initiative ([link](#)).

³ The Initiative for Responsible Mining Assurance ([link](#)).

⁴ The LBMA Responsible Gold Guidance ([link](#)).

⁵ The ICMM's Performance Expectations ([link](#)).

⁶ The Responsible Mining Initiative ([link](#)).



Alignment & Harmonisation

- **Ensure harmonization between different EU due diligence and reporting frameworks:** The Omnibus proposal should promote coherence across EU due diligence and reporting legislation (including the EU Batteries Regulation and the EU Conflict Minerals Regulation), while reducing the regulatory burden and creating the conditions to meet the Critical Raw Materials Act (CRM Act) objectives⁷.
- **Ensure consistent implementation across Member States:** In addition, the Omnibus proposal should secure harmonisation of the CS3D and CSRD implementation across EU Member States and a timely transposition.
- **Streamline Climate Transition Plans requirements across legislation:** The Omnibus proposal should streamline the requirements regarding the climate transition plans across different EU pieces of legislation, including the CSRD, CS3D, Industrial Emissions Directive (IED), and EU Emissions Trading System (ETS). To avoid duplication and administrative burden, companies should be required to develop only one comprehensive climate transition plan, supported by clear and consistent guidance on its content.

Corporate Sustainability Due Diligence Directive (CS3D)

- **Recognise the role of Voluntary Standards:** The important role of voluntary sustainability and due diligence standards should be recognised across the different EU due diligence legislations. Recognition processes for these standards must be efficient and timely to support business continuity.
- **Align with International Standards:** The Omnibus amendments should also ensure consistency with internationally recognised standards and principles, such as the OECD Guidelines for Multinational Enterprises (OECD MNE Guidelines), the OECD Due Diligence Guidance and the UN Guiding Principles on Business and Human Rights.
- **Maintain a proportionate Risk-Based Approach: The Omnibus proposal should preserve a strong proportionate risk-based approach.** Key provisions in the proposal need additional clarification to be workable for companies (see below).
- **Provide timely, principle-based Guidance:** The Commission should ensure a **timely adoption of principle-based and non-prescriptive guidelines** promptly following the adoption of the Omnibus proposal. This will support effective and consistent application across sectors and provide clarity.

⁷ The CRM Act sets a series of benchmarks by 2030 to increase domestic capacities and strategic raw materials value chain diversification. More information can be found [here](#).



Corporate Sustainability Reporting Directive (CSRD)

- **Revise the ESRS for clarity and efficiency:** The European Commission should achieve an ambitious and effective revision of the European Sustainability Reporting Standards (ESRS). This revision should aim to reduce the number of mandatory data points, clarify the application of the double materiality principle, and shift toward net-level reporting. Continuous and structured consultation with industry stakeholders is essential to ensure the standards are practical and impactful.
- **Pause additional phase-in data points for certain CSRD wave-1 undertakings:** The Commission recently delegated act to freeze the ESRS reporting requirements for wave 1 companies should be swiftly confirmed by the EU Parliament and Council.
- **Ensure more alignment with International Standards:** The Omnibus proposal should ensure greater alignment between the revised ESRS and international practices and reporting frameworks, such as GRI, SASB, ISSB, and IFRS S2, to enhance comparability and reduce complexity for multinational companies.
- **Coordinate with existing environmental legislation:** Sustainability reporting requirements should be consistent with existing environmental legislation — for example, by adhering to a calendar-year reporting basis and avoiding the introduction of additional or conflicting obligations.
- **Ensure alignment thresholds for non-EU parent companies:** The Omnibus proposal should ensure consistent thresholds and requirements for non-EU parent companies and their EU subsidiaries, to maintain a level playing field and avoid regulatory fragmentation.

III. Key Recommendations

Eurometaux calls on the co-legislators to consider the following recommendations to ensure the Omnibus proposal delivers on its goal of simplification and reduction of regulatory burdens, while remaining effective and workable for industry.

Alignment & Harmonisation

I. Ensure a harmonised EU framework of due diligence and reporting legislation.



- **Scope.**

The first Omnibus package must ensure alignment between the CS3D, CSRD, and the EU Taxonomy, as well as any other relevant due diligence initiatives.

Particularly, the CSRD threshold that includes under the scope companies with more than 1000 employees and either a turnover of more than €50 million or a €25 million balance sheet should be aligned with the scope of CS3D and Taxonomy, which both include companies with more than €450 million of turnover. Nevertheless, EU taxonomy reporting should remain voluntary for all undertakings, as we specified in our Position Paper released in March 2025⁸.

Additionally, consistency is needed with other EU due diligence pieces of legislation (i.e. the Batteries Regulation, the Conflict Minerals Regulation, and the EU Forced Labour Regulation), especially regarding scope, definitions and due diligence and reporting requirements.

- **Value chain definitions.**

The Omnibus proposal does not address the different concepts of value chain in the CS3D and CSRD.

The CSRD adopts indeed a broad definition covering operations, products and services, business relationships and both downstream and upstream activities. In contrast, the CS3D introduces the narrower concept of “chain of activities”, focused mainly on upstream processes with limited downstream coverage.

To reduce complexities and unnecessary regulatory burdens, the CSRD’s scope should be adjusted to align more closely with the CS3D, enabling companies to implement coherent due diligence systems.

- **Governmental control.**

Governmental control shall be equally consolidated and harmonised per member state (e.g. EU Conflict Minerals Regulation, EU Batteries Regulation, and CS3D control effected by one governmental entity per member state).

II. Secure harmonisation of the CS3D and CSRD implementation across EU Member States.

During the transposition phase of the CS3D and CSRD, Member States should aim to achieve the highest possible level of harmonisation. This is essential to minimise the fragmentation across the Single Market and prevent gold-plating at the national level, which could undermine the Directives’ effectiveness.

For the CS3D, the Omnibus amendments extend the level of harmonisation in Article 4 of the Directive to further provisions related to the duties to address adverse impacts and the duty to provide for complaints and a notification mechanism.

⁸ More information can be found at the following [link](#).



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However, several other provisions remain outside the scope of Article 4. Notably, Article 4(2), along with Recital 31, explicitly allows Member States to adopt more stringent provisions than those set out in the CS3D during its transposition phase.

This can put at risk the uniform implementation of the Directive, potentially leading to divergent national frameworks that would increase compliance costs and administrative burdens on all companies operating across borders.

To address this, the Omnibus amendments should also encourage alignment with existing national laws to prevent overlaps in obligations. Promoting the use of common formats and reporting standards at both the national and EU level would further support coherent and streamlined compliance.

III. Streamline the requirements regarding the Climate Transition Plans between different EU pieces of legislation.

At this moment, the EU uses different concepts of transition plans in different regulatory frameworks.

At least four different EU pieces of legislation at present impose uncoordinated definitions and obligations on transition plans, creating overlapping inconsistencies and administrative burdens that companies will have to address in the implementation phase.

- The EU Emission Trading Directive refers to “climate neutrality plans” at the installation level,
- The Industrial Emissions Directive (IED) requires “transformation plans” at the installation level.
- The Company Sustainability Reporting Directive refers to “climate transition plans” at the group level,
- The CS3D refers to “climate transition plans” at the entity level

The Omnibus proposal shall provide consistency regarding the requirements for transition plans across legislation (CSRD, CS3D, IED, ETS). A coordinated approach is needed to reduce reporting efforts and increase legal certainty.

Under the CSRD, publishing a climate transition plan is sufficient to meet the obligation to adopt the transition plan.

We welcome the Omnibus proposal’s deletion of CS3D’s obligation to put the transition plan into effect (Article 22(1)). However, more clarification is needed for the new requirement to include “implementing actions” after the adoption of the transition plan. This ambiguous term risks reintroducing the same regulatory burden the deletion aimed to remove.

It is crucial that the transition plan requirements included in different legislation, such as the CSRD, CS3D, the Industrial Emissions Directive (IED) and ETS, are aligned to avoid the introduction of double reporting obligations.

Companies shall develop **only one transformation/transition plan** to address alignment with objectives on climate neutrality, zero pollution and circular economy. It is of ultimate importance to streamline the requirements and develop clear guidance on the content of the plan, including specific improvement targets, measures, links to



technologies cross cross-media effects, enabling conditions and infrastructure needs for the measures and investments

Corporate Sustainability Due Diligence Directive (CS3D)

I. Recognise the important role of the Voluntary Sustainability and Due Diligence Standards.

Voluntary sustainability and due diligence schemes play an important role in facilitating compliance with due diligence requirements.

The Omnibus proposal should explicitly recognise the important role of voluntary sustainability and due diligence standards in supporting compliance with EU due diligence requirements.

In the non-ferrous metals sector, well-established schemes such as the **Copper, Zinc, Molybdenum, and Nickel Mark, Aluminium Stewardship Initiative, ICMM's Mining Principles, Initiative for Responsible Mining Assurance (IRMA), and the LBMA Responsible Gold Guidance** provide a strong foundation for responsible sourcing and transparency across the value chain. These standards help companies build resilient, ethical, and sustainable supply chains—a critical enabler of Europe's green and digital transitions.

Importantly, these standards are widely recognised by market actors, including those on the ground, which validates their credibility and practical relevance. They are also backed by years of industry experience and technical expertise, having been used extensively by companies in the sector. This long-standing engagement ensures that the standards are not only robust and adaptable but also grounded in real-world operational realities.

To ensure regulatory consistency, it is therefore crucial that the voluntary standards recognised under the EU Batteries Regulation, Conflict Minerals Regulation, and the Critical Raw Materials Act should also be recognised under the CS3D. These widely used and trusted standards offer flexibility and promote continuous improvement, making them effective tools for meeting evolving due diligence obligations.

II. Ensure that the CS3D and CSRD are grounded in international standards recognised by governments, such as the OECD Guidelines and the UN Guiding Principles



International standards such as the UN Guiding Principles⁹ and the OECD framework (OECD Guidelines for Multinational Enterprises on Responsible Business Conduct¹⁰ and OECD Due Diligence Guidance¹¹) should underpin due diligence requirements in the CS3D and CSRD. These standards offer clear, practical frameworks for identifying and addressing adverse impacts.

However, some provisions of the CS3D, such as Article 8 (as amended by the Omnibus proposal), require clarification to align fully with OECD principles. The identification and assessment of adverse impacts should continue to be based on a strong risk-based approach as indicated in international standards.

Beyond the UNGPs and OECD standards, the ILO Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy also provides a critical reference for effective due diligence practices.

Similarly, the implementation guidelines for CS3D must be firmly anchored in these international frameworks to ensure legal clarity and coherence.

III. Provide a workable framework based on clear definitions and on a strong proportionate risk-based approach.

- **Risk-based approach.**

The revised Article 8(2)(b) of the CS3D limits the companies' assessment of actual and potential adverse impacts on their own operations, subsidiaries and direct business partners. It further specifies that additional assessments beyond tier 1 will have to be carried out in case of "plausible information" of adverse impacts in indirect business partners' operations (Article 8(2a)).

While this narrows the scope, the introduction of vague terms, such as "plausible information", creates ambiguity. More clarity is needed on the concept of "plausible information" to ensure resources are focused on the most severe and likely risks, in line with the OECD's risk-based prioritisation approach.

A proportionate risk-based approach should allow companies to prioritise where the greatest risks lie, rather than requiring exhaustive checks on all indirect business partners. Excessive focus on lower-risk tiers can divert resources from addressing the most critical issues, since risk-based due diligence enables a cost-effective focus on where the most severe risks lie.

The materiality assessment included in the CSRD should guide companies towards what to actually cover.

- **SMEs information gathering.**

⁹ UN Guiding Principles on Business and Human Rights ([link](#)).

¹⁰ The OECD Guidelines for Multinational Enterprises on Responsible Business Conduct ([link](#)).

¹¹ The OECD Due Diligence Guidance for Responsible Business Conduct ([link](#)).



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In addition to what is reported above, Article 8(5) states that companies should not require, from direct business partners with less than 500 employees, information exceeding what is specified in the standards for voluntary use referred to in Article 29a of Directive 2013/34/EU¹².

While, as specified in Recital 22 of the Omnibus proposal, these amendments aim to limit the trickle-down effect on SMEs, Article 8(5) of the CS3D needs further edits to strike the right balance for the information sharing between large companies and SMEs that are direct business partners.

More alignment is needed between the CS3D and CSRD because the voluntary standards referred to in the new Article 8(5) of the CS3D are different from the information asked to be included in the management report under Article 29a of the Accounting Directive in the CSRD.

- **Monitoring.**

We welcome the proposed extension under Article 15 of the due diligence policy review cycle from one year to at least every five years. However, Article 15 states that the assessment should also be carried out when a “significant change occurs” or when there are “reasonable grounds to believe that the due diligence policies are no longer adequate or new risks may arise”.

Although important new developments would traditionally trigger a reassessment, the new unclear wording of Article 15 could lead to frequent and unplanned reassessments, especially in high-risk areas, increasing bureaucratic burdens and costs.

More clarification is needed to Article 15 to avoid excessive administrative burden.

- **Stakeholders’ engagement.**

The revised stakeholder definition in Article 3(1)(n) appropriately narrows the scope to employees of the company, its subsidiaries and business partners, as well as their trade unions, workers’ representatives, individuals, or communities.

However, the new definition of “legitimate representatives” still requires clarification, so to ensure companies can identify, with legal certainty, when and how to involve specific stakeholder groups.

IV. Secure a timely adoption of principle-based and non-prescriptive guidelines.

The Omnibus proposal, through Article 19(3), anticipates the adoption of general due diligence guidelines by 26 July 2026. It is nevertheless fundamental that the Commission also speed up the adoption of sector-specific, principle-based, and non-perspective guidelines immediately after the Omnibus proposal enters into force.

¹² Directive 2013/34/EU of the European Parliament and of the Council of 26 June 2013 (Accounting Directive).



Sector-specific guidelines are particularly important to address the diverse risks and operational realities faced by different industries. These guidelines should explain the interlinkages between the CS3D, CSRD and other relevant legislation such as the Forced Labour Regulation and the EU Batteries Regulation.

Companies need a considerable amount of time and resources to adapt to the new changes introduced in the Omnibus proposal. Any delay in the adoption of clear and consistent guidelines can impose additional challenges on companies and impair compliance with the Directive.

To ensure the effectiveness of these guidelines, the Commission should engage in continuous and structured dialogue with industry stakeholders throughout their development. This collaborative approach will help ensure that the guidelines are both workable and aligned with real-world operational needs.

Corporate Sustainability Reporting Directive (CSRD)

I. Deliver an ambitious revision of the ESRS and reduce the number of mandatory data points to the relevant information to be disclosed. Provide clarification on the principle of Double Materiality Assessment (DMA).

- **ESRS revision.**

The first set of ESRS provides a framework for companies falling under the scope of CSRD to report on their environmental, social, and governance impacts. There are three categories of ESRS: cross-cutting standards, topical standards, and sector-specific standards.

The Omnibus proposal mentions in its Explanatory Memorandum that the Commission will adopt a revision of the ESRS through a delegated act within 6 months of the entry into force of the proposal. In addition, the proposal states that the sector-specific standards will be deleted to avoid additional data points that companies should report.

The non-ferrous metal sector supports the simplification exercise launched by the Commission, also with the view of avoiding further fragmentation between Member States and creating different national pieces of legislation, which could ultimately increase burdens on companies.

In addition, Eurometaux welcomes the deletion of sector-specific standards and the forthcoming revision of the first set of ESRS. A sector-specific standard might not adequately address the unique characteristics and diverse value chains of companies operating in the metals sector, which often have chemicals, metallurgical, and multi-metal recycling activities.

On the other hand, a thorough revision of the ESRS is necessary to reduce and simplify reporting requirements for companies. The topical standards included in the ESRS are indeed unnecessarily detailed. The data points should cover the essential information to be disclosed in reporting on impacts, risks, and opportunities (IROs).



Data points on which reliable information cannot be collected or reported properly, as well as data points that are not useful or valuable for investors, should be removed.

Example: E2-5 Substances of Concern (SoC) and Substances of Very High Concern (SVHC)

The first set of ESRS includes mandatory disclosure requirements related to topical standards structured in subtopics and sub-subtopics, such as the E2 on Pollution and E2-5 substances of concern (SoC) and substances of very high concern (SVHC).

In the current form, the disclosure requirements for SoCs and SVHCs should be conducted through a Double Materiality Assessment and include information on raw materials, semi-finished products, and final products to be completed.

This can be extremely onerous and burdensome for companies since many SoCs and SVHCs may have more than one hazard class, meaning that the reporting requirements should be fulfilled in multiplying volumes. For example, cobalt carbonate presents six hazard classes, and it will need to be reported six times. Also, metals have the specificity to be present (transformed into other compounds) in all the steps of the materials flow (raw material input, intermediates, output)

In addition, ESRS include requirements to phase out SVHCs, even when other EU pieces of legislation (i.e. REACH Regulation) have considered alternative Risk Management Options (RMO) to Restrictions/Authorisation like occupational exposure values and do not impose any requirements for phasing out. This incoherence creates misalignment, besides increasing reporting requirements on companies.

The ESRS requirements on SoCs and SVHCs are purely hazard-based and do not allow any conclusions on environmental performance and sustainability since they do not provide any information on actual risks. There is no consideration for the technical function of the SoCs & SVHCs, i.e. their key enabling role in the energy transition (i.e. for batteries, electrolysis, and catalysts), and that substitution is often not possible at this stage.

- **Double Materiality Assessment (DMA).**

The Double Materiality Assessment (DMA), focused on impact materiality and financial materiality, as included in the ESRS, is currently based on a process that is way too complicated and burdensome for companies.

For instance, the value chain mapping exercise that is embedded in the DMA lacks clarity. The distinction between gross and net risks is counterproductive since companies often focus on risk mitigation and residual risk instead of pre-mitigation gross risks.

Furthermore, the DMA is even further complicated since the process includes both actual and potential future impacts. Large companies have thousands (to hundreds of thousands) of suppliers and customers around the world, and identifying and assessing IROs across all the suppliers and customers gets extremely challenging and arduous.



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On top of that, the set of guidelines adopted by EFRAG for the ESRS implementation is extremely long and impenetrable, making it often open to interpretation. For example, auditors tend to take a strict interpretation of materiality assessments, leading companies to assess every single data point and report on every sub and sub-subtopic if found material. In addition, auditors do not have detailed guidelines on how to assess the information and verify it.

- **ESRS shall move to reporting at a net level.**

The requirement in the ESRS to report information at a gross level should also be reviewed. The net assessment of opportunities and risks and the corresponding disclosure from a net perspective are essential for increasing transparency and comparability for the addressees of the reports.

Consistency and connectivity with the opportunities and risks report within the management report can only be ensured when applying a net perspective.

- **Involve the metal industry in the entire process of revision and simplification of the ESRS.**

For the challenges explained above, it is crucial that the Commission constantly engages with the industry sector throughout the whole process of revision of the ESRS. This will guarantee the adoption of workable and effective standards that will not undermine the competitiveness of EU industry.

II. Postpone the current reporting requirements under CSRD for companies under Wave 1.

While the “stop-the-clock” proposal delays CSRD reporting for Waves 2 and 3, Wave 1 companies are still required to report in 2025 for the 2024 financial year, despite the ongoing ESRS revision.

To ensure legal certainty and consistency, the reporting obligations for Wave 1 companies should logically also be paused until the revised ESRS are adopted.

In view of this, the recent Commission’s draft delegated act that postpones by two years (until 2027) the additional reporting requirements for wave 1 companies for financial years 2025 and 2026 should be highly prioritised for quick adoption.

III. Ensure more alignment between the ESRS and international standards and practices, such as GRI, SASB, ISSB, and IFRS S2, during the revision.

It is crucial to ensure that the ESRS aligns with international standards and recognised sustainability frameworks, such as the GRI (Global Reporting Initiative), SASB (Sustainability Accounting Standards Board), ISSB (International Sustainability Standards Board), and IFRS S2 (International Financial Reporting Standards). Since ESRS are mandatory in their nature, more coherence and interoperability with these standards should be secured.



Although the non-ferrous sector supports the simplification exercise of the ESRS, the Omnibus should not lead to further fragmentation between Member States, avoiding the use of different rules within the Single Market.

This alignment would prevent duplication of efforts and enhance the comparability and usability of reports, ultimately reducing the assurance costs.

IV. Ensure alignment of sustainability reporting with existing environmental legislation (i.e. calendar year basis, no additional requirements).

As the CSRD expands reporting obligations, companies must compile and provide a significant amount of data. The energy and environmental data points are already required by existing environmental legislation such as IED, E-PRTR, ETS and reported on a calendar year basis to competent authorities. Furthermore, pollutant release data and ETS data are publicly available in electronic databases.

The CSRD shall allow companies to directly use energy and environmental data in their sustainability reports, without imposing any additional requirements and rules in terms of data points, monitoring, calculation and reporting. The CSRD shall allow companies to directly use energy data and environmental data even if their financial year differs from the calendar year. This approach ensures consistency and reduces the reporting burden by permitting the use of existing data reported under other legislation.

This will reduce complexity, avoid imposing a disproportionate administrative burden and ensure consistency with other pieces of EU legislation.

V. Secure alignment in the thresholds for non-EU parent companies and their EU subsidiaries.

The Omnibus proposal amends Article 40a(1) of the Accounting Directive¹³ by introducing some exemptions for the listed subsidiaries to report individually. However, their parent companies are still required to include their data in the sustainability report starting in the 2028 financial year.

As a result, while the listed subsidiaries are exempted from individual reporting, parent companies remain subject to group-level reporting. This creates inconsistencies, especially for the situation of EU subsidiaries of non-EU companies, because these subsidiaries, when they are classified as “large undertakings”, meaning with more than 250 employees, are required to report at group level. On the other hand, EU companies only fall within the scope when they have at least 1000 employees. Therefore, more clarification should be achieved.

¹³ Directive 2013/34/EU of the European Parliament and of the Council of 26 June 2013 (Accounting Directive).



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In addition, it is unclear from the text which subsidiary of a group of subsidiaries of a non-EU company will be responsible for filing the report, as the Omnibus proposal indicates that at least one sustainability report must be disclosed.

It is crucial to secure alignment in the thresholds under Article 40a for non-EU parent companies and their subsidiaries. Article 40a should be amended to limit the extraterritorial reach of the scope of CSRD to large groups with EU subsidiaries subject to CSRD, ensuring a level playing field.

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About Eurometaux: Eurometaux is the decisive voice of non-ferrous metals producers and recyclers in Europe. We are an umbrella association representing the interests of the combined non-ferrous metals industry towards EU policymakers. In total, the industry employs directly 500,000 people and indirectly more than 3 million across over 900 production facilities, with an annual turnover of €120bn.

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