ABOUT THE EUROPEAN STEEL ASSOCIATION (EUROFER)

EUROFER is located in Brussels and was founded in 1976. It represents close to the entirety of steel production in the European Union. EUROFER members are steel companies and national steel federations throughout the EU. The major steel companies and national steel federations in Switzerland and Turkey are associate members.

ABOUT THE EUROPEAN STEEL INDUSTRY

The European steel industry is a world leader in innovation and environmental sustainability. It has a turnover of around €170 billion and directly employs 320,000 highly-skilled people, producing on average 170 million tonnes of steel per year. More than 500 steel production sites across 24 EU Member States provide direct and indirect employment to millions more European citizens. Closely integrated with Europe’s manufacturing and construction industries, steel is the backbone for development, growth and employment in Europe.

Steel is the most versatile industrial material in the world. The thousands of different grades and types of steel developed by the industry make the modern world possible. Steel is 100% recyclable and therefore is a fundamental part of the circular economy. As a basic engineering material, steel is also an essential factor in the development and deployment of innovative, CO₂-mitigating technologies, improving resource efficiency and fostering sustainable development in Europe.
A YEAR OF ONGOING CHALLENGES

2015 was a busy and challenging year, and several months into 2016 it is clear that this year is not likely to be any different.

Three main challenges face the European steel industry, though there are also a number of policy areas that are also attracting the attention of the European Steel Association (EUROFER), such as those on the circular economy for which steel, as a permanent material, should be recognised as a key factor.

The first of these main challenges is the existential issue of the economic and business climate for steel. As in 2014, EU steel demand rose in 2015. Indeed, apparent consumption in the EU grew by about 3.5% over the year. However, this increase in demand was entirely absorbed by imports. As a consequence, domestic deliveries fell by 0.2% over the whole of 2015, with a particularly negative trend in the second half of the year.

Total steel imports - of all qualities, including semis – increased by 23% in 2015 to 32.3 million tonnes, 5.9 million tonnes more than in 2014. The rise in finished imports amounted to 27%, with flat products rising 29% and long products 19% compared with 2014. Total exports fell by 9% in 2015 to 26.4 million tonnes. As a consequence of the accelerating rise in imports and sharp drop in exports, the EU became a net importer of steel in 2015, to the extent of 4.5 million tonnes.

Moreover, prices for some of the main steel product classes – for instance, hot rolled coil and cold rolled coil – collapsed in the second half of 2015, by as much as 40%. At best, uncertainty over prices will continue into 2016.

The impact on jobs and capacity has been significant. It is hard to forget that before the crisis there were 405,000 steel jobs. In last year’s Annual Report, we cited a figure of 328,000 – but in the second half of 2015 there were at least 7,000 further losses in the sector. There were net capacity closures of about 11 million tonnes between 2008 and 2015, with 9 million tonnes of capacity reduction since 2012. Any available extra capacity in the EU today is ‘cyclical’ overcapacity, available to serve a rebound in demand for EU steel.

Time is rapidly running out for the EU to do what it takes to retain its global leadership in steel as a strategic sector. Once the steel industry is gone, the capital base goes to ruin and the skills and know-how of European workers – built up over two hundred years – evaporates. European steel’s decline would threaten some of Europe’s major value chains, including European automotive, European machine tools and European energy technologies.

All of which leads to the second key challenge. EU trade policy must become more reactive and effective, forcefully tackling distortions by third market players. The finger is most often pointed at China, but dumping of steel is widespread and is undertaken by a number of our trade partners.

The EU’s trade remedy instruments must be made more effective and quicker to deploy in order to defend against unfair trade practices. Presently, the year-and-a-half long complaint and investigation process sacrifices jobs with no commiserate benefit. Compared to other major trading blocs, the EU’s trade defence scheme is perplexingly slow.
Member states should therefore do more to push through the European Commission’s proposal on the modernisation of the EU’s trade defence instruments. This pushing must take the form of action, rather than mere deliberation and rhetoric, and must cover everything from the speed of implementation, the possibility of the imposition of measures that actually reflect the degree of injury, and the lifting of the Lesser Duty Rule – among others.

The EU should also continue to deny Market Economy Status to China until such time as the country meets the EU’s well-established criteria. China, with its state-sponsored distortions, is not a market economy, and is not expected to become so in the foreseeable future. The EU must stand by its principles in dealing with the ongoing debate surrounding Market Economy Status.

The third key dossier currently under discussion is the revision of the European Union Emissions Trading System for the fourth trading period. Proposed to run from 2021 to 2030, the fundamental principles of the Emissions Trading System revision were established in the 2030 Climate and energy Package agreed by the European Council in October 2014. The proposal itself was released in July 2015.

The steel sector is increasingly affected by the Emissions Trading System legislation. The European Commission recognises that the steel industry is one of the small number of sectors at ‘very high risk’ of carbon leakage.

In its current form, the proposal would cost the steel industry up to €34 billion between 2021 and 2030, according to a recent ECOFYS study. More than 50% of ‘direct’ and ‘indirect’ costs would not be compensated for by 2030, resulting in an average cost of almost €30 per tonne of steel produced in the EU. Given that the average EBITDA of the industry has, over the past few years, been less than €40 per tonne of crude steel produced, this additional cost could be expected to wipe out industry margins. This would deter investment in Europe and further affect production and employment levels.

The Emissions Trading System proposal becomes an even greater issue when matched to the fact that with trade defence measures as porous as they are, efficient EU production risks erosion by inefficient foreign steel. For European steel to be replaced with more CO₂-intensive steel production abroad defeats the point of the Emissions Trading System whilst also risking the Jobs, Growth and Investment priorities of the ongoing Juncker Commission.

EUROFER, and its members, will continue to strive to highlight the importance of steel to the EU economy, and will use 2016 – a year of ongoing challenges – to demonstrate that a healthy European steel industry is both possible and desirable. We hope that next year’s Annual Report will be able to record our success in this endeavour.
EU RECOVERY GAINED TRACTION IN 2015

The economic recovery in the EU gained traction in 2015; all EU countries contributed positively to the 1.9% in GDP growth. Private consumption was the prime growth driver, but public expenditure also lent support to economic growth with fiscal policies becoming more expansive and governments increasing spending on the necessary provisions for the swollen flow of refugees seeking asylum in the EU.

By contrast, overall investment remained rather subdued. Headwinds from slowing economic momentum outside the EU, in combination with regulatory uncertainty and a lack of predictability with regards to business prospects, prevented investment from gaining significant traction. Exports suffered from faltering growth in the emerging economies in the second half of 2015, thereby offsetting the positive effects of the weakened euro.

2016: DOMESTIC RECOVERY EXPECTED TO GAIN FURTHER MOMENTUM

Early 2016 indicators and actual data present diverging indications on the most likely course of EU economy in the foreseeable future. The key question is whether domestic tailwinds will be strong enough to offset external headwinds.

Domestic demand appears to be holding up well, again with relatively strong support from private consumption. Investment will continue to grow moderately but the expected rate of expansion will most likely not be robust enough for investment to become the primary driver of growth.

Stuttering global economic activity and a slowdown in emerging and commodity-producing economies will act as a drag on EU exports. China’s slowing growth is a particular concern, and combined these occurrences will limit export growth and result in net trade pulling down GDP growth. This implies that the recovery will continue amid heightened risks.

STEEL USING SECTORS: 2015 ACTIVITY DRIVEN BY CONSUMER-RELATED SECTORS

Total activity in EU steel using sectors grew by approximately 2% in 2015. Sectors producing consumer goods, such as cars and white goods, have been doing better than expected owing to the robust boost from increased consumer spending during 2015. Improving activity in the residential construction segment resulted in a strengthening rebound in construction sector output. Weak investment in general, and in the oil and gas sector in particular, had a negative impact on output in mechanical engineering and the steel tube sector.

Prospects for 2016 are relatively positive, with sustained but slower growth in the automotive and the electric domestic appliances sector. Construction activity is expected to gain some momentum, as the recovery in demand becomes more broad-based. Tube and mechanical engineering sector activity will stop acting as a drag on total growth in the steel using sectors.

Total activity is forecast to rise by 1.9% in 2016.

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CRUDE STEEL PRODUCTION

Crude steel production in the EU amounted to 166 million tonnes in 2015, a drop of 1.8% compared with 2014. Steel producers in the EU did not gain from the increase in EU steel demand, which was fully absorbed by the increase in imports from third countries. EU mills also suffered from intensifying competition in their traditional export markets.

EU MILLS DO NOT GAIN FROM IMPROVING DOMESTIC DEMAND

EU apparent steel consumption rose 3.5% in 2015. Taking into account that real steel consumption at the end-user level grew by a modest 1.7% in 2015, the increase in demand reflects also the impact of an inventory build-up. The swelling of imports from third countries entering the EU was too much to be fully absorbed by end-users. As a consequence, the oversupply on the market ended up in stocks. The increase in steel inventories was significantly higher than that which occurred in preceding years.

Similar to the situation in 2014, only third country suppliers benefited from the increase in EU steel demand. Year-on-year growth in imports accelerated from 3% in the first quarter of 2015 – via 16% in the second quarter and 29% in the third quarter – to 48% in the fourth quarter of 2015. As a consequence, domestic deliveries fell by 0.2% over the whole of 2015 with a particularly negative trend in the second half of the year. Due to a 9% drop in exports, total EU deliveries fell 1.7% over the year.

The outlook for the EU steel market in 2016 is dull. Muted real steel consumption growth and the stock overhang at the start of the year will result in apparent steel consumption stabilising around the year earlier level. Trade data for the first two months of 2016 signal a further year-on-year rise in imports, stoking concern about another year of market distortions, with EU producers losing further market share.

TRADE VOLUMES

Total steel imports (of all qualities, including semis) increased by 23% in 2015 to 32.3 million tonnes, 5.9 million tonnes more than in 2014. The rise in finished imports was 27%, with flat products rising 29% and long products 19% compared with 2014.

With regard to the main countries of origin for steel imports, Russia and the Ukraine continued to dominate semis’ imports into the EU whereas China, the Russian Federation and the Ukraine are the main countries of origin for imports of finished steel products. Together the ‘big three’ account for 54% of total finished product and 59% of flat product imports.

For long product imports, the main countries of origin are China, Belarus (due to vigorous growth in 2015 into second place after China), Ukraine, Turkey and Switzerland.

Preliminary customs data signal that imports remain at a high level in early 2016. Rather than EU domestic demand conditions it will be third country (over)supply that determines the tonnage of imports arriving in the EU in 2016. China will continue to play a crucial role in stabilising the global supply-demand balance. The key question is whether China will be able to adequately align output and capacity with declining demand levels in the relatively short term.
Total exports fell by 9% in 2015 to 26.4 million tonnes. As a consequence of the accelerating rise in imports and sharp drop in exports, the EU became a net importer of steel in 2015, to the extent of 4.5 million tonnes. There was a trade deficit in semis and flat finished steel products, which was only partly compensated for by a trade surplus in long finished products.

With regards to the key destinations for EU exports, Turkey and the US accounted for almost 50% of flat products exports. The most important destination for long products remained the Algerian market, which absorbed 40% of total EU long product exports. Switzerland, the United States and Turkey are among the other major markets for long products.

The outlook for exports in 2016 remains rather uncertain. International competition looks set to remain fierce as long as the major emerging markets face economic headwinds. The consequences will result in pressure on steel demand. Without the necessary output corrections, the supply overhang will have to find its way onto international steel markets.

**DELIVERIES OF STEEL (ALL QUALITIES EXCEPT STAINLESS STEEL)**

Total deliveries of finished products grew 2% in 2015. Domestic deliveries to the EU market and exports showed fairly similar trends, with domestic deliveries rising 1.7% and exports 2.3%.

- **Total Steel Deliveries**
  - +2%
  - of which to the EU28 market +1.7%
  - of which to export markets +2.3%

In 2014, total flat product deliveries increased by around 2.5%. Deliveries by EU mills to the domestic market rose 1.5%, whereas the increase in exports was more pronounced.

- **Total Flat Product Deliveries**
  - +2.3%
  - of which to the EU28 market +1.5%
  - of which to export markets +7.1%

In 2014, total deliveries of long products grew almost 1.5%. Following several years of decline, shipments to the domestic market rose 2.5%, owing to the slight recovery in EU construction activity. Meanwhile, exports fell by 3%.

- **Total Long Product Deliveries**
  - +1.3%
  - of which to the EU27 market +2.5%
  - of which to export markets -3%

**STAINLESS STEELS**

The EU market supply for stainless steels decreased by 2.1% in 2015. Total deliveries of stainless steel finished products by Community producers to the EU market rose by 1.9% year-on-year. Imports from third countries decreased by 13.5%, somewhat reflecting the decrease in imports of stainless steel cold-rolled flat products from the People’s Republic of China and Taiwan following the imposition of anti-dumping duties.

The decrease in apparent consumption was also driven by a de-stocking phase which had followed the stock accumulation registered at the end of 2014, anticipating the aforementioned duties and the gradual decline of the Nickel price from $14,750 per tonne in early January to $8,800 at the end of December 2015. This had the effect of reducing demand and delaying some orders.

Stainless steel melting by EU producers decreased by 1% in 2015, falling slightly short of 7.2 million tonnes. This was aligned with the evolution of global stainless steel production, which decreased slightly compared to 2014. This decline reflects the slowing of Chinese demand, which brought that country’s production down by 0.6% for the first time. Chinese production accounted for about 52% of total worldwide production in 2015 (source: ISSF).

In the flat products segment, EU apparent consumption decreased by 2.5% in 2015 compared with 2014, with imports from third countries falling by 15.5% and domestic deliveries increasing by 2.3%. In the long products category, market supply in the EU decreased as well by 1.3% year-on-year as domestic supplies remained flat, up by just 0.3%, while imports from third countries decreased by 6.6%.

With significant uncertainty still affecting the global economy, private consumption forecasts in the EU, together with a more important role for investment, could help real and apparent consumption increase slightly in 2016.

**ALLOY SPECIAL STEELS (OTHER THAN STAINLESS)**

In the first half of 2015, EU producers of alloy special steels recorded a slight increase in demand compared with the same period of 2014. However, in the second half of the
year, orders eased as a result of the seasonal de-stocking, historically low and volatile raw materials prices, and extremely weak activity in certain market segments.

In 2015, both light and heavy vehicle (passenger cars, light commercial vehicles and heavy commercial vehicles) production in Europe substantially increased compared to 2014, resulting in a good level of demand for alloy steels in the automotive sector. On the other hand the output of the mechanical engineering sector fell by 0.4% year-on-year and the market for oil and gas applications remained depressed due to the postponement or cancellation of many projects in 2015 due to falling oil prices.

Overall, the EU market supply of alloy special steels decreased slightly, by 0.1%, in 2015. Supplies from Community producers decreased by 1.1% year-on-year. Imports grew by 10.2%. Exports by European producers to non-EU markets decreased by 1.5%, resulting in a fall in total deliveries of 1.1%.

EU producers’ total deliveries of tool and high-speed steels decreased by 0.2% in 2015. Although supplies to non-EU markets improved by 3.5% year-on-year, deliveries to the EU fell by 2.2%. In alloy engineering steels, the EU market supply remained flat, slightly decreasing by 0.1% compared to 2014. Deliveries from Community producers fell by 1% whilst imports from third countries grew by 9.7%. Exports of alloy engineering steels by EU mills to non-EU markets decreased by 3.3%.

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A working coke oven making coke from coal
EU TRADE CASES

In 2014, China's steel demand turned abruptly negative, impacted by the deceleration of the Chinese economy (-3.3% in 2014, -3.5% in 2015), exposing massive excess steel capacities estimated at around 400 million tonnes, which is more than double total EU steel demand.

As a consequence, Chinese basic steel exports worldwide surged dramatically in 2014 to 90 million tonnes and in 2015 to more than 100 million tonnes.

In 2015, Chinese finished steel exports to the EU surged to 7.5 million tonnes, double the level of 2013. In 2015, Chinese finished steel exports to the EU recorded the highest surge rate among destination regions (+140% compared with 2013). Since mid-2015, China has been exporting finished steel at prices below variable cost.

Overall, EU finished steel imports surged by 27% in 2015. As EU steel demand increased by only 2.3%, EU steel mills lost significant market share to third country suppliers. In the context of intensifying low-priced, unfair import competition, EUROFER strengthened import monitoring to cover all basic flat and long steel products. Steel trade remedy actions were initiated on imports of Chinese High Fatigue Performance rebar, Chinese and Russian Cold-Rolled Flat products. Final anti-dumping measures were imposed in 2015 on imports of Stainless Steel Cold-rolled Flat products, Grain-Oriented Electrical Steel (GOES) from Japan, South Korea, USA, Russia and China, and Chinese wire rod (expiry review).

In August 2015, the European Commission published definitive anti-dumping duties on imports of stainless steel cold-rolled flat products originating in China and Taiwan, following the complaint filed by EUROFER in May 2014. The Commission’s investigations have confirmed that imports of stainless steel cold-rolled flat products from China and Taiwan were sold at dumped prices and caused significant injury to the EU stainless steel industry. The European Commission Implementing Regulation imposed definitive anti-dumping duty rates of up to 25.3% on imports from China, and up to 6.8% on imports from Taiwan.
Following EUROFER’s request and the opening of an absorption reinvestigation on the anti-dumping measures in force on imports of stainless steel drawn wires from India, in September 2015 the European Commission published the implementing Regulation which has confirmed the absorption of the measures and imposed a higher anti-dumping duty rate, applicable to a single Indian producer. Rates for other Indian producers remained the same.

PROLIFERATION OF THIRD COUNTRY STEEL TRADE AND MARKET DISTORTIONS

In the context of worsening global excess steel capacity and soft global steel demand, third countries are increasingly tackling import competition through a combination of increased tariff and non-tariff barriers (Mexico, India, Algeria, South Africa etc.).

In December 2015, Algeria introduced an import quota combined with a non-automatic licence regime applicable on imports of rebar (a long steel product for reinforcing construction). This quantitative restriction, infringing the EU–Algeria Free Trade Agreement, caps overall rebar imports to 2 million tonnes, a decrease of around 1 million tonnes from the traditional import level. The measure mainly impacts southern European countries. EUROFER has called on the Commission to ensure the continuation of the preferential, duty-free market access to the Algerian market for rebar.

TRADE DEFENCE INSTRUMENT MODERNISATION AND CHINA’S MARKET ECONOMY STATUS

EU trade policy must be reinforced, forcefully tackling distortions by third market players. The finger is most often pointed at China, but dumping of steel is widespread and is undertaken by a number of our trade partners.

EUROFER has already requested short-term action by the European Commission. Many of these approaches are already possible under current EU trade regulations: These include:

- A Threat of Injury procedure where possible in order to speed up trade measures.
- Implementation of provisional measures after 6 months instead of 9 months.
- Reasonable target profits for the EU steel industry when establishing anti-dumping measures.

Member states should do more to push through the European Commission’s proposal on the modernisation of the EU’s trade defence instruments. This modernisation must cover everything from the speed of implementation, the possibility of the imposition of measures that actually reflect the degree of injury, and the lifting of the Lesser Duty Rule – among others. Those member states resisting lifting the Lesser Duty Rule must consider the effect of this blockage on European jobs and growth - and on the survival of the EU’s industry.

The EU should also continue to deny Market Economy Status (MES) to China until such time as the country meets the EU’s well-established criteria. China, with its state-sponsored distortions, is not a market economy, and will not become one in the foreseeable future. China is nevertheless placing political pressure on national and EU policy makers to prematurely grant it MES status. The country is arguing that its WTO protocol assures it MES by the end of 2016. However, the WTO protocol was established under the presumption that China would make sufficient progress towards becoming a market economy; progress that it unfortunately has yet to make.

Were MES to be granted, the anti-dumping measures that safeguard hundreds thousands of EU jobs against China’s unfair competition across a range of strategic EU industries would become ineffective. The EU’s other trade defence measures would be insufficient to defend against the rising tide of dumped Chinese products, particularly steel.

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YES TO JOBS AND FAIR TRADE!
NO TO MES FOR CHINA MARCH

The challenges of the past few years culminated with a protest march in 2016. Taking place on 15 February, EUROFER, with the involvement of AEGIS Europe, organised a Say Yes to Jobs & Fair Trade! Say No to MES for China! march. This march, which saw employees, employers and several trade unions walk alongside each other.

This march was attended by over 5000 people from at least 18 EU member states. The vast majority of the attendees were from the steel sector.

The march was held to reinforce calls to put a swift end to dumping, to modernise Trade Defence Instruments, and to prevent Market Economy Status being granted to China prematurely.

At least 15 European steel industry CEOs attended the march. These top industry leaders marched in solidarity with their employees for the length of the march.

Demonstrators were greeted with speeches by the EUROFER President and EUROFER Director General Axel Eggert. They were also joined on stage by European Parliament Vice President Antonio Tajani, who addressed the crowd. Mr Tajani was presented with a plaque highlighting the main messages of the European Industrial Manifesto for Jobs & Fair Trade, developed especially for the demonstration.

As the march proceeded, a delegation from EUROFER, AEGIS Europe and IndustriAll European Trade Union met with Commission President Juncker in the Berlaymont. The meeting with Mr Juncker provided the opportunity to also present him with the manifesto plaque.

The march proceeded peacefully and participants waved flags and held placards highlighting the main messages.

The demonstration was covered by a wide range of media outlets, particularly television and included a well-attended press conference. A number of interviews were given by business leaders and by employees attending.

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IRON ORE: OVERSUPPLY COMPOUNDS DEMAND WEAKNESS, DEPRESSING PRICES

In the first quarter of 2015, the spot iron ore price remained under pressure as low-cost miners continued to expand capacity while at the same time China’s iron ore imports weakened. As a result, the benchmark spot price for 62% Fe iron ore slipped from over $70/tonne to well under $50/tonne. In the second quarter of 2015 spot prices reversed as Chinese buyers came back to the market with slightly improved sentiment and most mills turned again to imports after Chinese port stocks had been drawn down.

By mid-2015, poor steel market fundamentals and bearish sentiment in China again sent spot prices down. Some recovery took place later in the third quarter.

In the final quarter of 2015, import demand from China remained subdued due to domestic production cuts after the holiday period. Meanwhile, the global seaborne supply surplus increased further as the iron ore majors pressed ahead with ramping up of production. The 62% Fe benchmark spot price for Chinese imports ended 2015 at around $40/tonne.

HARD COKING COAL: PRICES SOFTEN ON WORSENING MARKET FUNDAMENTALS

Coking coal spot prices weakened continuously over the first five months of 2015 on persistent oversupply. Sellers cut prices to improve the competitiveness of seaborne coking against domestic Chinese offers, in order to shift material to China. The price of premium hard coking coal ‘FOB Port’ east coast Australia slipped from around $120/tonne to $85/tonne in May, breaching an 11-year low. In June, some support from lower port and mills’ stocks and reduced bearishness in the Chinese steel market resulted in a temporary recovery of spot prices.

However from mid-2015 onwards, spot prices started to slip further, reflecting the negative impact of steel production cuts and weak steel market sentiment in China. Overall, buying remained slow. At the end of the year, the price for premium hard coking coal FOB Port east coast Australia softened to around $77/tonne.

SCRAP PRICES: SECOND HALF-YEAR 2015 PRICE CORRECTION LED BY TURKEY

Scrap prices in the EU remained relatively range-bound in the first half of the year, despite downward pressure from iron prices. However, prices started falling in July with Turkey leading a global downward correction in scrap prices. Turkish mills started to source less scrap, owing to billets having become an interesting alternative from a pricing perspective; this was particularly true for Chinese billet after the yuan devaluation.

The price downturn bottomed out in October. In the final months of 2015, prices basically moved sideways within a fairly narrow band. While pressure from billets on scrap demand continued, scrap dealers countered price pressure by reducing supply into the markets. The EUROFER scrap price indices ended 2015 some 85 index points below the start of the year.

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CIRCULAR ECONOMY

Steel, being a permanent material, is the material of choice for the Circular Economy since its inherent properties are preserved no matter how many times it is recycled. This means that there should be support for the ongoing use of steel in products. EUROFER will continue to push for a legislative framework on waste that is more flexible in granting market access to our co-generated industrial materials (e.g. ferrous slag) and that creates more recovery and recycling opportunities for our waste. As part of this, a brochure entitled ‘Steel and the Circular Economy’ was prepared in 2015 and distributed to the European institutions.

On 2 December 2015 the Commission released the new package on the Circular Economy containing an EU Action Plan and a set of Directives that amend different pieces of the existing EU waste legislation. EUROFER has prepared a position on the Commission proposal to revise the Waste Framework Directive. This will be followed by additional papers and further action throughout 2016.

EUROFER’s main suggestions on making the Circular Economy into reality include:

1. Improved product design and waste hierarchy implementation. These are essential elements of the Circular Economy. Product design policy should foster the use of long-lasting and multiple recyclable materials in order to support more products’ ‘circularity’. The adoption of new definitions for ‘final recycling process’ and ‘backfilling’ would lead to better implementation of the waste hierarchy, distinguishing thus true recycling from other recovery operations.

2. Applying ‘by-products’ criteria and streamlining interactions between waste and chemicals legislation are essential steps in preventing and reducing waste generation. The requirement of member states to recognise industrially ‘co-generated’ products as by-products is a key step towards an effective waste prevention. The interaction between chemicals (e.g. REACH) and waste legislation should incentivise the recovery and transformation of waste into secondary resources to be recycled.

3. The economic measures in support of a Circular Economy should be implemented through performance-based fiscal instruments (tax credits and VAT reductions), avoiding any new income tax, resource based tax and subsidy.

4. General restrictions and targets on landfilling should be limited to municipal waste. Stream-specific wastes are totally different and need individual assessment.

5. The empowerment of the Commission through delegated acts should only be granted with very specific and clear action boundaries, linked to the final objective for which the delegated act has been requested.

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PRODUCT RELATED ENVIRONMENTAL ISSUES

Life Cycle Thinking has now become a central theme in product ‘eco-design’ policy, thanks to the recently announced Circular Economy package. 2016 will be an important year for ensuring that the ‘permanent material’ attributes of steel – such as recyclability and durability – are at the forefront of driving resource efficiency, as well as reducing waste to landfill.

Standards for assessing reusability, recyclability and durability will be developed for the eco-design of energy related products. At the same time, indicators for the environmental performance of buildings will also be decided. The European steel industry is fully behind these initiatives, since it has long been known that most of the lifecycle environmental impacts of products, including for buildings, are determined at the design stage.

The European steel industry continues to advocate a fair assessment methodology in the Centre for European Standardisation Technical Committee (CENTC 350) standardisation activities, particularly in the field of Environmental Product Declaration (EPD) and building environmental performance. Thanks to an amendment to the mandate from the European Commission, work will now start on bringing EN 15804 into closer alignment with the Product Environmental Footprint (PEF) methodology. The mandatory inclusion of end-of-life benefits of material reuse and recycling, as well as the clarifying of the reporting of emissions from waste recovery operations, are essential in ensuring the credibility of EPDs and their contribution to a more resource efficient supply chain. Full recognition of the value of iron and steelmaking slag by-products in reducing emissions and improving resource efficiency in other sectors is also required.

The automotive sector is not immune from life cycle thinking, and given the current focus on assessing actual environmental emissions, the post-2020 vehicle emissions regulations are a perfect opportunity to prevent the shift of the environmental burden. 57% or more of the emissions from future vehicle designs will come from the manufacture and end-of-life stages rather than the in-use phase. Therefore, it is imperative that the post-2020 legislation, to be consulted on later this year, takes into account full lifecycle emissions and not just vehicle tailpipe emissions. EUROFER and our members continue to collaborate with other metals, through the Metals for Buildings platform and the PEF metal sheet pilot. We have a shared interest in promoting the end-of-life aspects of materials, over and above the historical and often misguided focus on recycled content.

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AIR POLICY REVIEW

During 2015, discussions on the “Clean Air Policy Package” continued with the adoption of the Directive on Medium Scale Combustion plants. The initial Commission proposal did not consider the particularities of iron and steel production process gases. The advocacy actions undertaken by EUROFER led to the legal acceptance of these particularities (Emission Limit Values for SO₂, NOₓ). The revision of the National Emissions Ceilings Directive (NEC-D) is ongoing. EUROFER already clearly expressed that the commitments for the steel industry should be aligned with the Best Available Techniques (BAT) approach, guaranteeing a high general level of protection of the environment as a whole under economically and technically viable conditions.

BEST AVAILABLE TECHNIQUES REFERENCE DOCUMENTS (BREF)

Under the Industrial Emissions Directive (IED), decisions on Best Available Techniques (BAT) conclusions establish the

1 Ricardo, Preparing for a life cycle CO₂ measure, 2011
legal reference for the Emission Limit Values in the permits. As a result, the establishment of BREFs has gained increased importance. EUROFER is dismayed by the outcome of the final Technical Working Group (TWG) meeting dealing with the review of the Large Combustion Plants (LCP) BREF. The characteristics (quantity and quality) of our LCPs, utilising iron and steel (I&S) process gases have not been properly recognised in the set Best Available Techniques Associated Emission Limit values (BAT-AELs) for SO$_2$ and NO$_x$. EUROFER submitted a split-views report and a legal memo, followed-up by bi-lateral meetings at different levels and services within the Commission.

In 2016, further advocacy actions will take place with the goal of having our justified main split views acknowledged in the final BREF. The European IPPC Bureau (EIPPCB) has re-activated the revision process of the Ferrous Metal Processing (FMP) BREF. EUROFER and its members are preparing the so-called front-loading exercise, resulting in, amongst other things, the identification of the key environmental issues. EUROFER FMP Shadow Working Groups on Hot Rolling, Cold Rolling and Hot Dip Galvanising have been established with, as an umbrella, a Horizontal SWG (dealing with the strategy, coordination).

The kick-off meeting of the Seville TWG is scheduled for September 2016. For the Surface Treatment Using Solvents (STS) BREF, the European Coil Coating Association (ECCA)/EUROFER shadow working group is handling the revision process. The kick-off meeting of the Seville TWG was held in November 2015 and 2016 will be an important year in the revision process (data collection and key environmental issues). Finally, for the Waste Treatment BREF, EUROFER and its members are revising the so-called ‘D1’ draft to submit comments during the first quarter of 2016.

WATER

The prioritisation process revising the list of priority substances under the Water Framework Directive continued throughout 2015. Iron was included, along with more than 300 other substances, in undergoing the monitoring based approach (of the process). Another substance of relevance also included in the prioritisation exercise is free cyanides. EUROFER is participating in an industry monitoring programme for the determination of the natural background concentrations of free cyanides in surface waters. This research, if successful, would allow the collection of robust environmental monitoring data, better protecting the industry’s interests. The Iron Environmental Quality Standard (EQS) project will continue in 2016. A multiple linear regression model (MLR) was developed to allow for the prediction of toxicity as a function of water chemistry. Efforts in 2016 will be put into the search for an appropriate analytical method for measuring iron in natural water samples in such a way that only the bioavailable fraction is measured.

CHEMICALS

EUROFER has continued monitoring and following up on the various Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH) processes, with a special focus on authorisation of those substances relevant for the steel sector, such as cold tar pitch high temperature and ceramic fibres, amongst others. EUROFER has had to clarify with the European Chemicals Agency (ECHA) the status of a few substances for which EUROFER confirmed that the intermediate status was not supported by its membership.

EUROFER also contributed to the establishment of a website for the Cross Industry Platform. This platform, composed of different industry sectors, has the objective of gaining recognition for the so-called Risk Management Option Assessments (RMOAs) for Substances of Very High Concern (SVHC) that are workplace-related, instead of submitting them under the authorisation procedure. EUROFER and the European General Galvanisers Association (EGGA) submitted the application for the renewal of exemption 6a for lead in machining steels and galvanized steels. This submission occurred in the context of the review of exemptions under the RoHS (Restriction of the use of certain Hazardous Substances in electrical and electronic equipment) Directive.
EUROFER STAINLESS HEALTH & ENVIRONMENT

Stainless steel is the term used to describe a remarkable and extremely versatile family of steel grades, which are known for their corrosion and heat resistant properties. All stainless steels contain iron as the main element, and besides chromium, nickel is the main alloying constituent in many stainless steels. All stainless steel produced in Europe is created in Electric Arc Furnaces. This is, to a significant degree, created using stainless scrap. It therefore contributes significantly to the circular economy. Due to relatively limited scrap availability it remains necessary to produce stainless out of virgin materials. Relatively small quantities of direct CO₂ emissions are associated with the Electric Arc Furnace process. It remains, however, very energy (electricity) intensive.

As the present and future EU Emissions Trading Scheme legislation will impose a great burden on non-renewable electricity production, it is inevitable that these additional costs will be passed through by the power generating companies to stainless producers. In order to establish a global level playing field these indirect extra costs need to be compensated for. Unfortunately, this compensation introduces a disparity between member states since it is subject to State Aid scrutiny, and is limited to a maximum of only 80%, resulting in a significant disadvantage for European producers compared to producers in other regions of the world.

Stainless steel is a metallic alloy – and not a mixture, as it is wrongly considered to be in the relevant EU legislation. In the EU classification system, only concentrations of hazardous constituents are considered and not the metallurgical bonding and the effect of the chemical matrix. Being intrinsically part of the alloy assures that the release of nickel, chromium and other metals, such as manganese and iron, are negligible and well below the Specific Release Limits in product regulations. Although it was initially a system for information, the Global Harmonised System (GHS) is now used as a tool for regulation. The simplified and conservative aspect of the system creates problems for stainless steel. To address these issues, EUROFER Stainless is working together with the non-ferrous metals industry to find a robust methodology to test these alloys without using in vivo testing. Once this methodology is validated, it could be the basis for risk-based toxicity assessment as an alternative for the present hazard-based approach.
REVIEW OF THE EU EMISSIONS TRADING SYSTEM POST 2020

In July 2015 the European Commission presented the proposal on the review of the EU Emissions Trading System (EU ETS) Directive. The key features of the proposal were:

- The annual linear factor on the total ETS cap was increased to 2.2% to achieve the target of reducing emissions in ETS sectors by 43% by 2030 compared to 2005 levels;
- The auctioning and free allocation shares were capped to the pre-2020 levels, respectively 57% and 43%;
- The methodology of the carbon leakage assessment was reviewed to reduce the number of eligible sectors to around 50;
- The update of benchmarks was based on an annual linear reduction flat rate between 0.5% and 1.5% in respect of each year between 2008 and the middle of the relevant period of free allocation;
- More recent production levels were proposed for the calculation of the free allocation;
- The Innovation Fund (NER 400) was extended also to projects concerning low carbon technologies in industrial sectors.

EUROFER’s position on the EU ETS revision is that the system should not lead to direct or indirect carbon costs at the level of 10% most efficient installations in sectors at risk of carbon leakage. In line with this principle, EUROFER reacted to the Commission proposal with a position paper highlighting the following requests:

- The caps (fixed volumes) on auctioning (57%) and free allocation should not be applied in order to avoid the continuation of the cross sectoral correction factor and the undue linear factor of the benchmarks below technical achievable levels after 2020 for sectors at risk of carbon leakage;
- Were these caps to be retained, the number of free allowances available to industry after 2020 should be adjusted with the unused allowances from the third trading period and the MSR; additionally a new CDM for generating CERs should be considered;
- In the event that best performers were still to face a shortage in free allowances, the available free allocation should be distributed according to the relevant level of carbon leakage exposure, ensuring that at least sectors at ‘very high risk’ of carbon leakage receive 100% free allocation at the level of 10% most efficient installations;
- No linear reduction factor should be applied to benchmarks as it cuts free allocation below technically and economically feasible levels. Benchmarks should be updated once before the fourth trading period and not midway through on the basis of real industry data, taking into account the whole amount of CO₂ from ‘waste’ gases occurring unavoidably as a result of steel production;
- Indirect carbon costs, passed through in electricity prices to electro-intensive industries at risk of carbon leakage such as steel, should be fully offset through harmonised and transparent rules in all member states, preferably through free allocation based on realistic benchmarks.

IMPACT ASSESSMENT OF THE EU EMISSIONS TRADING SYSTEM POST 2020

Following the publication of the Commission proposal, EUROFER commissioned Ecofys to assess the impact of the proposed text on the European steel industry. The study was presented in November 2015 at an event organised by EUROFER at the European Parliament in Strasbourg.
The study found that the EU Commission proposal for EU ETS post 2020 could result in a shortage in free allowances increasing from 31% in 2021 to 48% at the end of the fourth trading period (2030). Only 24% of the indirect carbon costs related to carbon costs passed through the electricity consumption would be covered by financial compensation over the decade, assuming that Member States that are granting compensation today will continue to do so in EU ETS Phase 4.

The EU ETS could therefore cost up to €34 billion over the period 2021-2030, of which €26 billion in direct carbon costs and €8 billion in indirect costs. This would result in a total cost of up to 28€/t of crude steel by 2030. Considering that the sector has registered an EBITDA (earnings before taxes, depreciation and amortisation) of around €35/t of crude steel over the past few years, such high carbon costs would jeopardise the competitiveness of the sector, deter investment from Europe and affect existing levels of production and employment.

**ENERGY UNION STRATEGY**

In February 2015, the European Commission presented a communication on “A Framework Strategy for a Resilient Energy Union with a Forward-Looking Climate Change Policy”. The communication defined an Energy Union Strategy around five policy dimensions: energy security; internal energy market; energy efficiency; decarbonisation; research, innovation and competitiveness. It was accompanied with a Roadmap indicating, for each policy dimension, the initiatives that will be undertaken during this Commission mandate.

EUROFER has stressed that high EU energy and regulatory costs hamper the recovery and investment in the sector. The availability of affordable and competitively priced energy is of foremost interest for the energy-intensive industries, including steel. There must be a clear commitment by the EU to effectively reduce the gap in industrial energy prices and costs between the EU and its main competitors.

In particular, the EU should develop a cost-effective strategy for decarbonising power generation. Full offset of indirect ETS costs passed on energy prices should be possible for energy intensive sectors such as steel, as well as exemptions from taxes, levies, including grid levies, and other costs relating to the support and development of low carbon generation. EU policies must not constrain member states who wish so from exploiting indigenous energy resources, including unconventional gas.
SUSTAINABILITY STRATEGY

In the currently challenging environment, in which the EU steel industry is facing severe pressure from non-EU competitors on domestic and global markets, as well as competition with other materials, sustainability is a key component of any strategy aimed at increasing the demand for steel originating in the EU.

In 2015, an enhanced sustainability strategy was worked on in EUROFER to develop an overarching narrative and specific initiative on sustainability.

This initiative is based on 4 agreed principles:
1. demonstration that steel is a sustainable and permanent material;
2. promote steel made in Europe as sustainable and the EU steel industry itself as a sustainable producer;
3. recognise that each steel sector segment faces a specific market environment wherein the very concept of ‘sustainability’ may itself vary;
4. specific sustainability initiatives undertaken by a given segment must fit into the overall steel strategy and must not negatively affect the work done in other segments.

The EUROFER Sustainability Strategy is implemented by three new Working Groups set up at the beginning of 2015: the Sustainability Credentials Working Group, the Rebar Working Group and the Coordination Group.

1. SUSTAINABILITY CREDENTIALS WORKING GROUP

The Working Group is responsible for the development of an overarching sustainability narrative for the European steel industry. Intense work and interaction among WG members led towards the first sustainability vision document (to be published in 2016). Through this publication, EUROFER is contributing to the development of a vision of a sustainable future.

The European steel industry vision is based on the key contribution of the sector to socio-economic growth, sustainable production and products, and the circular economy. The Vision is derived from the breadth of EUROFER’s expertise. It results in a comprehensive narrative demonstrating how sustainability has long been at the root of the EU steel industry’s activities, and how this is has advanced into a Vision for the future.

2. REBAR WORKING GROUP AND THE SUSTSTEEL PROJECT

An initiative on rebar – based on the SustSteel project – and with the aim of having a European standard established, began in 2015. This initiative fits in the overall sustainability strategy and the process will only be applicable to rebar, within the limits of the agreed principles (see above).

The proposed approach towards a harmonised mandatory standard is the amendment of the mandate M/115 in the context of the Construction Product Regulation. The legal basis for the amendment is represented by the Basic Requirement for Construction Work (BRCW) n. 7 (sustainable use of natural resources). However, this only deals with the environmental elements thereof. After intense interaction with the European Commission, and with the objective of including also the social element, at the end of 2015 the proposal was to have two separate mandates:
1. Amendment of the M115 (for environmental aspects);
2. A parallel mandate for the social pillar based on supporting existing policies.

The European Commission is exploring the possibility of implementing this solution.

In the meantime the SustSteel project is continuing as a voluntary certification scheme. In 2015, the list of SustSteel mark awarded centres (plants) reached 25. The awarded plants are present in 8 different European countries.

3. COORDINATION GROUP

With the aim of synchronising the initiatives and to secure their coherence in order to guide their implementation at EU level, the Coordination group is steering the activities of the sustainability strategy. The Group is composed of relevant EUROFER staff and the chairmen of the initiatives.

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RAIL TRANSPORT

The Fourth Railway Package – with the increase in the interoperability of national railway systems and ‘single wagon’ services – was among EUROFER transport committee’s main focus areas in 2015. This is expected to continue to be so in the foreseeable future. Closely linked to the discussions on the Fourth Railway Package are the TEN-T (trans-European transport network) corridors, with a special focus on the pace of execution and the prioritisation of investment.

In 2015, EUROFER was actively involved in a project set up by the European Commission on the organisation and maintenance of single wagonload traffic in Europe. EUROFER played an important role and made its presence felt during large infrastructure projects carried out by both the Commission and the rail freight transportation association (FERRMED), the latter of which’s target is to develop a Europe-wide network. Information on what the steel industry expects was transmitted to the Community of European Railway and Infrastructure Companies (CER), mainly on the subject of the single wagonload, in order to help improve the quality of the service of railway operators.

EUROFER also continued to be involved in the European Railway Agency’s (ERA) work, the aim of which is “to implement a better electronic system for passengers.”

ROAD TRANSPORT

As in recent years, the weights and dimensions of vehicles in international transport continued to garner significant attention in 2015. With the topic proving enduringly problematic, EUROFER met with the members of European Commissioner for Transport Violeta Bulc’s cabinet to discuss the facilitation of international traffic of 44-tonne trucks between member states. EUROFER promoted the implementation of standardised weights and dimensions within the European Union. The harmonisation of European regulations and the authorisation of cross-border traffic of 44-tonne and 60-tonne trucks continues to be discussed within the EUROFER Transport committee.

The issue of the Electronic Road Transportation Control System (EKAER) in Hungary was also mentioned in the meeting with Commissioner Bulc’s cabinet. The EKAER system is designed to minimise VAT fraud in the country. This creates various customs-related challenges for international transport companies. Further processing of this issue is still on-going with the Commission. Further work in the European transport field will continue, with challenges with rising border controls, differing rest times and minimum wage regulations for drivers and possible tax and social dumping impacts among EU member states.

MARITIME TRANSPORT

The Emission Control Areas (sea areas with stricter controls on airborne emissions) and their impact have been one of the main focuses for maritime transport in recent years and will continue to be so. Another key focus is, and has been, on port regulation, with the autonomy of port authorities, clarity on State Aid guidelines, and financial transparency.
EMPLOYMENT

In 2015, the EU steel industry continued to witness a surge in imports of massively dumped steel from China – with these imports absorbing the small rise in EU steel demand. This dumping, combined with related adverse regulatory and business conditions caused a further fall in employment in the European steel industry. The European Steel Industry (EUROFER) estimates that by the end of 2015, employment in the sector had declined by 2% compared to 2014 levels. The EU steel industry now has 320,000 direct employees, compared to 328,000 in 2015.

Activities of the Sectoral Social Dialogue Committee on Steel

The Sectoral Social Dialogue Committee (SSDC) on steel seeks to monitor the social, economic and employment consequences of EU policies on the steel sector. The European social partners, EUROFER and the industriAll European Trade Union have continued to build upon their shared understanding and mutual trust, working together since 2006.

STRUCTURAL CHANGE

EUROFER and industriAll followed closely the various developments impacting the steel industry, notably the issues of granting Market Economy Status (MES) to China and the impact of the EU ETS Revision on the competitiveness of the sector. In this light, the following joint actions were undertaken by EUROFER and industriAll in 2015:

- A joint declaration on the G7 summit in Elmau supporting a globally sustainable economy which reconciles environmental objectives with competitiveness and the creation of quality employment (May 2015).

In addition, a European Industrial Manifesto for Free and Fair Trade was undersigned by employers and employees from manufacturing sectors, among which EUROFER and industriAll, in February 2016. A demonstration “Say Yes to Fair Trade – Say No to China MES” was organised in Brussels to reinforce the Manifesto’s key messages.

The SSDC committee further exchanged information on the development of steel trade cases and macroeconomic situation in Europe, with a particular emphasis on the steel market. On training and education: The SSDC committee discussed the industry’s workforce profile, notably the ageing issue and problems of recruiting a suitably skilled and qualified workforce to meet its future needs. The committee recommended developing a survey aiming to map and scope out the current demographic profile of EU steel industry with the support of Prof. Dean Stroud (Cambridge University – UK) in the course of 2016.

HEALTH AND SAFETY

The EU Social Partners were official partners of European Agency for Safety and Health at Work (EU-OSHA) campaign on “Healthy workplaces – Manage stress” until end of 2015. The Committee should assess the option to renew the exercise, depending on the next campaign’s theme.

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### DIRECTORY

**President**

Geert van Poelvoorde - ArcelorMittal

**Board**

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**Director General**

Axel Eggert
## MEMBERS

### Companies

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<td><a href="http://www.stahl-online.de/stahl_zentrum/edelstahl_vereinigung_e_v.htm">http://www.stahl-online.de/stahl_zentrum/edelstahl_vereinigung_e_v.htm</a></td>
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<td>GREECE</td>
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<td>POLAND</td>
<td>Hutnicza Izba Przemysłowo-Handlowa</td>
<td><a href="http://www.hiph.com.pl">http://www.hiph.com.pl</a></td>
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<td>ROMANIA</td>
<td>Uniunea Producatorilor de Otel din Romania – UniRomSider</td>
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<td>SPAIN</td>
<td>Unión de Empresas Siderúrgicas - UNESID</td>
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<td>Jernkontoret</td>
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<td>UNITED KINGDOM</td>
<td>UK Steel</td>
<td><a href="http://www.uksteel.org.uk">http://www.uksteel.org.uk</a></td>
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#### ASSOCIATE MEMBERS

<table>
<thead>
<tr>
<th>Name</th>
<th>Website</th>
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<tr>
<td>Çolakoglu Metalurji</td>
<td><a href="http://www.colakoglu.com.tr">http://www.colakoglu.com.tr</a></td>
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<tr>
<td>Türkiye Çelik Üreticileri Derneği - TÇÜD</td>
<td><a href="http://www.dcud.org.tr">http://www.dcud.org.tr</a></td>
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<td>Erdemir - Ereğli Demir ve Çelik Fabrikaları</td>
<td><a href="http://www.erdemir.com.tr">http://www.erdemir.com.tr</a></td>
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<td>Isdemir - Iskenderun Demir ve Çelik Fabrikaları</td>
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<td>Swiss Steel</td>
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