

Brussels, 30 September 2026,

CBAM trilogue:
Close the downstream gap and protect EU industrial value chains

Open letter to:
the European Parliament, the Council and the European Commission

Dear Members of the European Parliament,

Dear Ministers,

Dear Vice-President, Dear Commissioners,

Dear Trilogue Negotiators,

The forthcoming trilogue negotiations on the extension of the Carbon Border Adjustment Mechanism (CBAM) will determine whether CBAM protects Europe's entire industrial value chain or leaves significant downstream manufacturing exposed to carbon leakage and unfair competition.

Without coherent coverage of downstream products, CBAM risks making it more attractive to import a finished pan or knife than to manufacture it in Europe using steel or aluminium subject to carbon costs. The trilogue must ensure that Europe's climate ambition supports its industrial value chains rather than encouraging companies to move production abroad.

We therefore call on the European Parliament, the Council and the European Commission to:

1. **preserve all relevant downstream product codes for cookware already contained** in the respective institutional positions;
2. **support the additional cookware codes** adopted by the European Parliament;
3. **close the remaining gaps** concerning cutlery, knives, scissors and other metal-intensive consumer products; and
4. establish an **effective, WTO-compatible and administratively workable export solution for downstream manufacturers.**

The Federation of the European Cookware, Cutlery and Houseware Industries (FEC) represents an important and emblematic European industrial sector, accounting for approximately 65,000 jobs and €9 billion in annual turnover¹. Its companies manufacture essential, high-quality and long-lasting everyday products, from cookware, kitchen utensils and cutlery to a broad range of household goods used by millions of European consumers every day. These products continue to be manufactured in Europe under some of the world's highest environmental, social and regulatory standards.

However, FEC's impact assessment shows that **full-scale CBAM could increase production costs by approximately 22% for aluminium cookware and 5% for stainless-steel cookware.** Without coherent downstream coverage, European production and exports could decline, industrial employment could be put at risk and carbon-intensive imports could replace products manufactured in Europe. This would shift emissions and industrial value creation rather than reduce them.

¹ IFH Cologne and IVSH

I. Secure the progress already achieved

The inclusion of CN codes **7323 94 00** and **7323 99 00** in the positions of the European Commission, the Council and the European Parliament must be preserved in the final agreement.

The inclusion of **7323 93 00** in the Council and Parliament positions is another important step and must likewise be retained.

II. Support the European Parliament's additional codes

We call in particular on the Council and the European Commission to support the additional product codes adopted by the European Parliament:

- **7615 10 10**
- **7615 10 30**
- **7615 10 80**
- **7323 92 00**
- **7324 10 00**

These additions are essential to ensure coherent treatment of comparable steel- and aluminium-intensive products. Covering some cookware materials while excluding directly competing products made from other metals would preserve an arbitrary gap, increase carbon-leakage and create new distortions within the European market.

III. Close the remaining downstream gaps

Important product categories nevertheless remain outside the current institutional positions. These include, in particular, products under CN headings:

- **7323 91**
- **7615 20**
- **7616 10**
- **8211**, knives with cutting blades
- **8212**, razors and razor blades
- **8213**, scissors and similar shears
- **8214**, other articles of cutlery

These products face the same fundamental cost asymmetry. European manufacturers bear increasing carbon costs for steel and aluminium inputs, while competing finished goods may continue to enter the EU without an equivalent carbon cost.

We therefore call for these product families to be included in the final agreement.

IV. Deliver an effective export solution

European downstream manufacturers cannot be expected to absorb increasing carbon costs while competing on global markets against producers that do not face comparable obligations.

The final agreement should therefore provide a predictable, WTO-compatible and administratively workable export solution. It must be accessible to downstream manufacturers, including SMEs, and cover all relevant product categories rather than only upstream basic materials.

➤ Complete the logic of CBAM

CBAM was designed to **prevent carbon leakage, not to displace manufacturing**, investment and emissions outside Europe.

A coherent CBAM must therefore protect the full value chain, from basic materials to the finished products manufactured from them. European companies should not be required to produce under ambitious European climate rules while being placed at a structural disadvantage against carbon-intensive finished imports.

We respectfully ask the European Parliament, the Council and the European Commission to turn the progress achieved so far into a coherent industrial and climate-policy outcome.

Yours sincerely,

Co-signatories



Federation of European
cookware, cutlery and
houseware industry

IVSH - Industrieverband
Schneid- und
Haushaltwaren

Synetam - Union des
fabricants
d'équipements et
d'ustensiles pour la
restauration et les arts
culinaires

FIAC - fabbricanti
italiani di articoli
per la casa

Olivier Brault,
President

Jan-Frederik Kremer,
Geschäftsführer
General Manager

André-Pierre Doucet,
– Délégué Général

Mara Rossi,
General Manager