

# From LESS to More: Bridging EU Label Debates and Global Standards' Alignment for Low-Emission Steel

ESTEP Green Steel Dialogue  
27 January 2026

Dr. Carmen Ostwald  
Secretary General



# Agenda

- 1. LESS Standard Update: Technical Progress and Next Steps for Low-Emission Steel Certification**
- 2. EU Policy in Focus: Debating a Voluntary Label for Steel's Greenhouse Gas Intensity**
- 3. Global Alignment in Action: The ResponsibleSteel/LESS Interoperability Initiative**



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# LESS AISBL – Who we are



## LOCATED IN EUROPE

The association LESS AISBL is an independent non-profit organization located in Brussels.

## MEMBERSHIP

28 European steel producers from 8 countries that account for almost 45% of EU crude steel production

## OPEN FOR MEMBERSHIP

LESS AISBL is open for new full and associated members.  
Contact: [info@less-aisbl.org](mailto:info@less-aisbl.org)

### LESS Full Members

### Associated Member



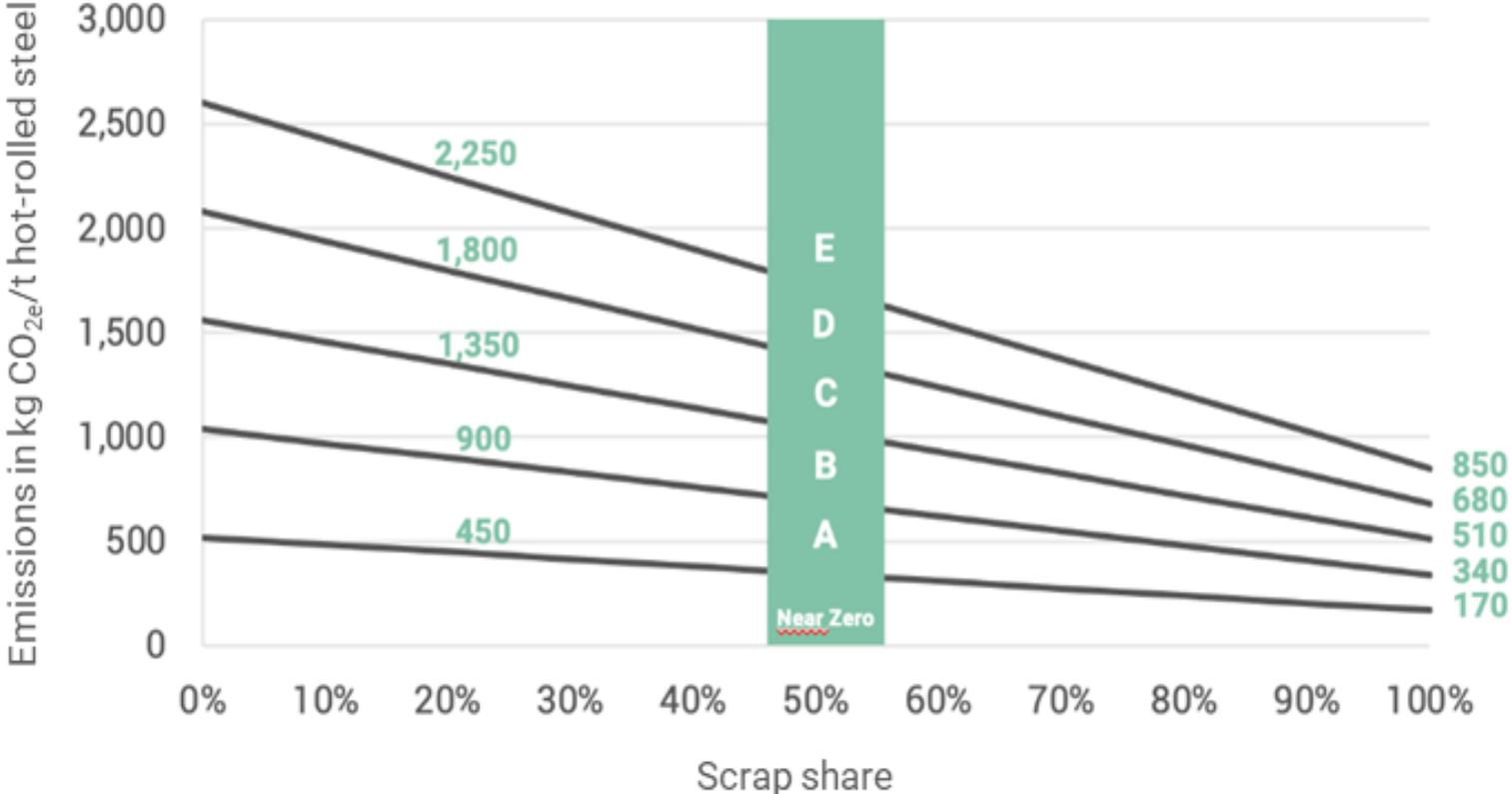
### Approved Certification Bodies



# Steel Decarbonisation Scale: Incentivising decarbonisation steps towards near-zero steel production



Classification system for quality steel



**Note:** Emission values calculated according to the LESS rulebook, based on EU ETS (not identical to EPD/PCF)

# LESS – A Framework for Transparent, Low-Carbon Steel



**Classification**  
Verified according to: LESS-Rulebook v1.1  
 Certificate no.: LESS-000-2025

Near Zero

Low emission

E

A

B

C

D

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**Scrap share** XXX %  
Verified according to: LESS-Rulebook v1.1  
 Certificate no.: LESS-000-2025

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**Product Carbon Footprint** XXXX kg CO<sub>2e</sub> /t product  
Certified against:  
 Certificate no.:

Disclaimer: The footprint used in the classification (hot-rolled steel and LESS rulebook v.1.1) differs from the shown carbon footprint (end product and specified ISO standard).

**Classification**  
Verified according to: LESS-Rulebook v1.1  
 Certificate number: LESS-003-2025

Near Zero

Low emission

E

A

B

C

D

---

**Scrap share** XXX %  
Verified according to: LESS-Rulebook v1.1  
 Certificate number: LESS-003-2025

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**GWP-total according to EPD** XXX kg CO<sub>2e</sub>/t product  
Certified against: XXX  
 EPD number and publication date: XXX, XXX

Disclaimer: The footprint used in the classification (hot-rolled steel and LESS rulebook) differs from the shown carbon footprint (end product and specified ISO standard).

**Assessable Transformation**

Transformative efforts in steel manufacturing can be classified, compared, and made assessable.

**Climate-Conscious Procurement**

Public and private steel buyers can easily integrate low-emission criteria into purchasing decisions. By demanding higher classification, climate ambition can be increased step by step

**Foundation for Lead Markets**

LESS provides a basis for establishing lead markets at both national and EU levels.

**Technology-Neutral & Globally Compatible**

LESS is open to all technologies and designed for international compatibility.

# Since September 2025, six companies have been awarded Less Certificates



**Certificate**  
according to LESS Rulebook, version 1.1

Steel Producer: Georgsmarienhütte  
Neue Hüttenstraße 99  
49124 Georgsmarienhütte  
Germany

Certification Body: DNV Business Assurance  
Wolbeckstr. 25  
45329 Essen  
Germany

The entire production of Georgsmarienhütte has been successfully validated by DNV Business Assurance according to the above-mentioned version of the LESS Rulebook and determination of the scrap share are part of the production data. The accuracy of these sampling, LESS classifications reflect the results. The following classifications have been verified in SSG01SBT01, dated 15.08.2025:

Process Route:	EAF-HR
Classification System:	<input checked="" type="checkbox"/> Quality Steel
LESS Classifications:	<input type="checkbox"/> Near Zero <input type="checkbox"/> Low Emission <input type="checkbox"/> E

According to the audit report, the assurance is given that the steel products produced at the production location with the LESS label, in accordance with the LESS Label Usage\* as published on the LESS website.

1. Abbreviation for process steps: BF – Blast Furnace; EAF – Electric Arc Furnace; HR – Hot Rolling Mill

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**Certificate**  
according to LESS Rulebook, version 1.0

Steel Producer: thyssenkrupp Steel Europe AG  
Kaiser-Wilhelm-Str. 100  
47166 Duisburg  
Germany

Certification Body: TÜV NORD CERT GmbH  
Am TÜV 1  
45307 Essen  
Germany

The entire production of thyssenkrupp Steel Europe AG has been successfully validated by TÜV NORD CERT GmbH in accordance with the above-mentioned version of the LESS Rulebook and determination of the scrap share are part of the production data. The accuracy of these sampling, LESS classifications reflect the results. The following classifications have been verified in Audit Report No. 3010128:

Process Route:	BF-BOF-HR
Classification System:	<input checked="" type="checkbox"/> Quality Steel
LESS Classification:	<input type="checkbox"/> Near Zero <input checked="" type="checkbox"/> Low Emission <input type="checkbox"/> E
Scrap Share	13 %

According to the audit report, the assurance is given that the steel products produced at the production location with the LESS label, in accordance with the LESS Label Usage\* as published on the LESS website.

1. Abbreviation for process steps: BF – Blast Furnace; EAF – Electric Arc Furnace; HR – Hot Rolling Mill

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**Certificate**  
according to LESS Rulebook, version 1.1

Steel Producer: Salzgitter Flachstahl GmbH  
Eisenhüttenstraße 99  
38239 Salzgitter  
Germany

Production Locations: Steel Production BF-BOF; Hot Rolling: see company address above

Steel Production EAF: Salzgitter Flachstahl GmbH  
Eisenhüttenstraße 99  
38239 Salzgitter  
Germany

Certification Body: TÜV NORD CERT GmbH  
Am TÜV 1  
45307 Essen  
Germany

The entire production of Salzgitter Flachstahl GmbH via the process routes specified below has been successfully validated by TÜV NORD CERT GmbH in accordance with the above-mentioned version of the LESS Rulebook. The LESS classification and scrap share for the following product groups have been verified and documented in Audit Report No. 35400941, dated 26.08.2025:

Product Group SZFG 1:	Hot strip, unpickled, blast furnace route
Process Route:	BF-BOF-HR
Classification System:	<input type="checkbox"/> Quality Steel <input checked="" type="checkbox"/> Structural and Reinforcing Steel
LESS Classification:	<input type="checkbox"/> Near Zero <input type="checkbox"/> Low Emission: <input type="checkbox"/> A <input type="checkbox"/> B <input type="checkbox"/> C <input type="checkbox"/> D <input checked="" type="checkbox"/> E
Scrap Share	20 %

1. Abbreviation for process steps: BF – Blast Furnace; DRI – Direct Reduction Plant; BOF – Basic Oxygen Furnace; EAF – Electric Arc Furnace; HR – Hot Rolling Mill

➤ Current LESS-certified companies:

- Georgsmarienhütte
- thyssenkrupp Steel
- Ilsenburger Grobblech
- Salzgitter Mannesmann Grobblech
- Peiner Träger
- Salzgitter Flachstahl
- Saarstahl
- Saarstahl Rail

➤ Certificates available online

➤ Further audits ongoing

➤ Annual third-party verification as basis

# Outlook: Scope Extension and Chain-of-Custody Concept Planned



## Extension of LESS Rulebook for further products

- Existing Rulebook covers **Quality Steel and Structural and Reinforcing Steel**
- Extension of the Rulebook has been worked out
  - **Stainless Steel** (expert working group established – merging Eurofer/Kobolde and LESS approach)
  - **Electroslag Remelting**
  - **Ingot Casting**
  - **Forging**
  - **Tube Rolling**

## Transfer of LESS Certificates along the value chain

- **Physical tracking of certified coils vs. application of mass balancing**
- **Certification of processed steel products** based on a rulebook yet to be developed
- **LESS invites steel processors throughout the supply chain to collaborate on developing a suitable concept**

**Advisory Board is currently being established to ensure broad stakeholder participation**

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# EU Policy Debate: Sliding Scale vs. PCF-Only in Steel Decarbonisation



## Supporters of the Sliding Scale

- “Sliding Scale incentivises **all production routes** (primary + secondary).”
- “Takes **limited scrap resources** into account – esp. of high quality scrap”



## Opponents of the Sliding Scale

- “Sliding Scale **favours primary routes** - risk of market access for high-PCF North African steel.”
- “**Opposes circular economy.**”

## Assessment of Positions:

- Sliding Scale **accounts for upstream emissions** in primary routes: scrap enters PCF at ~zero
- First LESS certificates show:
  - **EAF (100% scrap + green energy) = Class A today**
  - **Primary (DR + green H<sub>2</sub>) = Class A future**
- A standard ≠ trade protection - **local content rules** needed for market access.”

# Voluntary Union Label on greenhouse gases intensity of Steel: Policy Gaps & Industry Divide



Image: KI-generated by ChatGPT

27/01/2026

## Current Status

- Label planned under **Industrial Accelerator Act** which is delayed to 25.2.2026 (indicative)
- Leaked draft suggests **Sliding Scale for scrap shares (20–90%)** – no clarity beyond this range

## Key Challenges

- Split industry → EU developing **own approach** instead of unified steel standard
- Risk: **Years of delay** before label can underpin **lead market regulation**.

## Proposed Compromise (Eurofer)

- Combine **LESS classification** with:
  - PCF** (Product Carbon Footprint)
  - RC** (Recycled Content)
- Use all three parameters for **public procurement**—balancing incentives for all routes.

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# Collaboration for Climate-Neutral Steel: Why LESS Joined the Steel Standards Principles (SSP)



# SSP

## STEEL STANDARDS PRINCIPLES



This work supports the delivery of Steel Breakthrough Priority Action 1.

- **Promoting Transparent GHG Accounting**  
 SSP’s framework for **standardised emissions data** (from mining to crude steel) supports **comparable and reliable reporting** – a key priority for LESS.
  
- **Advancing Global Decarbonisation Efforts**  
 A **unified global approach** to emissions reporting reduces fragmentation and **accelerates progress toward climate-neutral steel**.
  
- **Benefiting from a Diverse Global Network**  
 With **66+ supporters**, SSP offers LESS **valuable insights and perspectives** to further develop low-emission steel standards.

Source: <https://steelstandardsprinciples.org/>

# Bridging Standards for Climate-Neutral Steel: The LESS & ResponsibleSteel Interoperability Initiative



## ➤ Shared Vision

- Joint commitment to **science-based, credible standards**
- Objective: **Near-zero steel products** through aligned decarbonisation efforts
- **Sliding Scale Approach**: Incentivising reductions across **all production routes** (primary + secondary)

## ➤ Trust & Collaboration

- Positive collaboration through **joint policy statements**.
- Standards as **complementary**, not competitive.
- Open to **mutual learning** and co-developing solutions



Image: KI-generated by ChatGPT

27/01/2026

ESTEP Green Steel Dialogue

# From collaboration to Results: Conversion Tool & Claims Guidance



## Core Objectives

**Simplify dual certification for producers and enable comparability for processors:**

- Steel producers can more easily achieve certification under both standards.
- Steel processors can use both standards in tenders and compare offers via conversion

## Key Actions & Outcomes

	<b>Transparency on Methodologies</b>	Clear <b>alignment/differences</b> between LESS and ResponsibleSteel frameworks
	<b>Two-Way Conversion Tool</b>	Tool with <b>defined accuracy</b> and <b>application guidelines</b> for comparability
	<b>Assurance &amp; Claims Guidance</b>	Unified rules for <b>verification and claims</b> to ensure trust
	<b>Pilot Implementation</b>	Tested and refined using <b>real company data</b>

**Thank you for your attention!**

