



Managing market and regulatory uncertainty in steel producers' decarbonization strategies: a European perspective

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Introduction

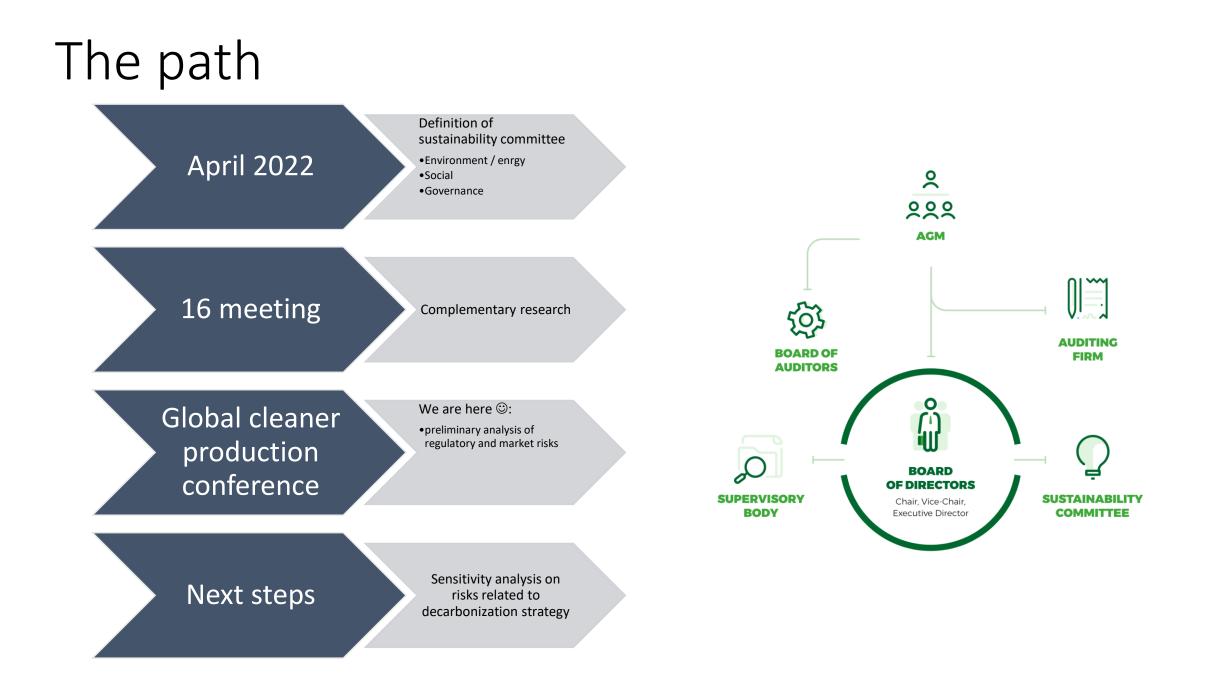
Research scope and design

The path

Research scope and design

Research design

Scope:	• ESG - EU-ETS	
Sector:	Steel production	
Research method:	 case study (multiple) 	
Perimeter:	 European (multinational: Italy and Germany) 	
Focus:	 decarbonization strategy to 2030 	
Problem definition.	 Regulatory and market risks 	



Reason why market background

Reason why Marked background

Reason why

• Companies that integrate sustainability into every aspect of corporate governance and management have significantly higher ESG performance than other companies and the national average'

To improve

performance

• European regulations are extending reporting requirements on specific information that can only be collected by setting up a new sustainability process and governance

European regulations (taxonomy).

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• It will be (it is) increasingly important to have comparable and measurable KPIs: so they must be identified, monitored and published

To respond to the demands of the financial market

• (and market premium)

To respond to customer demands

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To be compliant with

To report in an integrated way

Consistent and

management.

comprehensive corporate

integrated path in terms of

analysis, vision, strategy, and

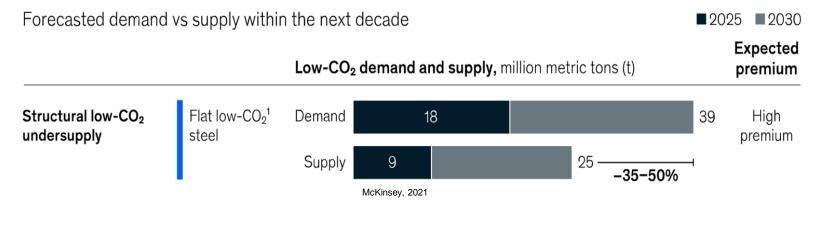
reporting requires an

The current market and future projections

The demand for **steel with low greenhouse gas emissions** is increasing. End customers (automotive and construction) require it to respond to requests for more sustainable and circular products.

Expected premiums: still for a niche market, but will become the norm in the next 3-10 years

European Supply and Demand for low-carbon flat products by 2025 and 2030

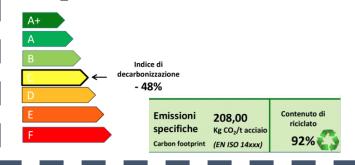


Highly variable (and difficult) to predict premiums currently between 15-55 €/t

The 3 positions on the definition of Green Steel

Italy

- Green steel label similar to EU energy label
- Two distinct baseline (level E) threshold values:
 - •BF-BOF: 2 tCO₂eq/t
 - •EAF: 0.4 tCO₂eq/t
- Single value for net-zero threshold (level A+): 0.05 tCO₂eq/t



Germany 'Calibrated on BF-BOF 'Variable baseline and net-zero thresholds based on the % of scrap used Baseline threshold (E): • From 2,5 to 0,87 tCO₂eq/t Net-zero threshold (A): From 0,5 to 0,3 tCO₂eq/t Sc Total CO₂e ed rap Carbon stema di classificazione per la

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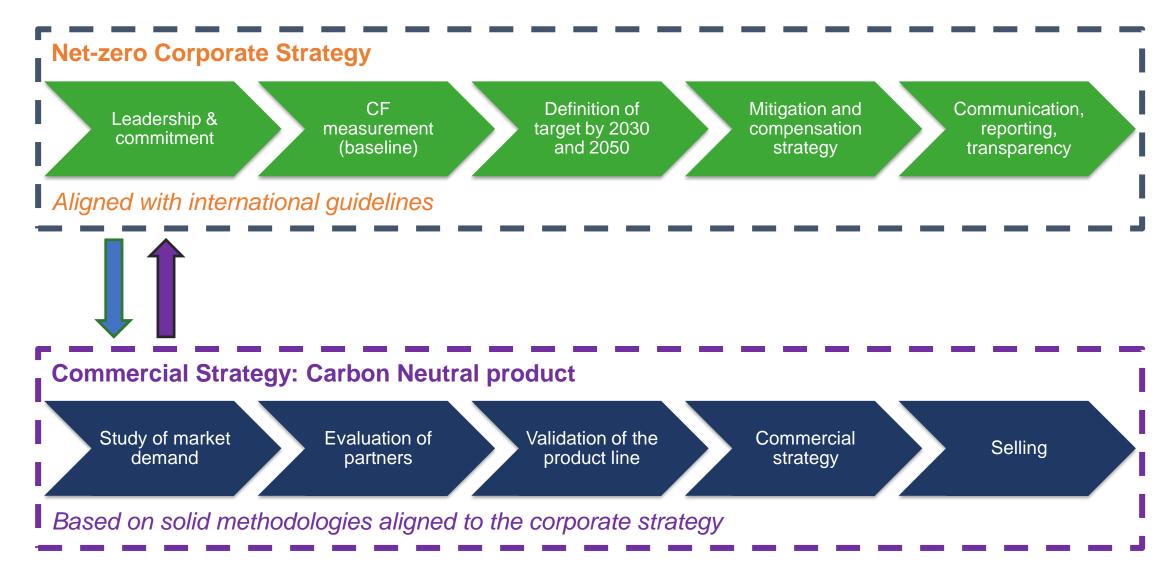
- •Focused on impact, independent of the technology used to make it
- •Lower and lower limits over time (Scope 1,2,3)
- Members & Supporters: Arvedi, Beltrame, Pittini, Riva



Strategy and commercialization

Managing uncertainty

From corporate strategy to commercial strategy



Managing uncertainty Even if a *typical strategy can be like this...*

- Consistency with the corporate decarbonization strategy
- Enhancement of investments to reduce direct emissions
- Alignment with international guidelines and European taxonomy

INTERNAL DRIVERS

- Scientific solidity certificates on emissions actually avoided
- ISO 14067 standard (product carbon footprint) with certified algorithms

 Requests from the construction and automotive market

- Aligned with strategies of international players (ArcelorMittal, Tata, Thyssen, etc.)
- International partner

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• Market and regulatory uncertainty

Results and conclusion

The plan: strategic KPIs

Risks and impact on plan

The plan: Identified KPIs

 $\rm CO_2$ Emissions (Scope 1 and Scope 2) - tCO2/t

Energy intensity GJ/t

RES- %

Specific waste production- Kg/t

Residuals entered in Circular Processes - %

Circular flow - %

Water consumption- m3/t

Main risks associated with the Strategy (I)

	Initiative	Risk	Туре	Prevention Actions	Impact Mitigation
A	Self-production	Delayed pipeline identification (wind)	Execution	 Contact different developers 	 Increasing PPA volumes
B	Use of Green Fuels (biomethane)	Sourcing difficulties of biomethane	Market	• Evaluate alternative options	 Buy long contracts term with multiple suppliers
C	Use of Green Fuels (hydrogen)	Impacts on process/interaction with other materials	Technical	 Gather information on the testing of other European players 	 Establish production plan that considers potential delays
D	Self-production	Increased plant development costs	Market	 Identify plants to be developed first Insertion of contract clauses 	 Evaluate a potential strategy switch by increasing the PPA/GdO portfolio
E	Use of Green Fuels (hydrogen)	Delay in the development of H2 supplies	Market	 Contractual leverage with suppliers and obtain government support 	 Evaluate use of other green- fuels
F	Decarbonization of the energy mix	Delay Decarbonization of the country's energy mix	Regulatory	 Continuously monitor the country's level of carbon intensity 	 Purchasing PPAs and GOs in the event of lower decarbonization of the energy mix
G	Self-production	Long bureaucratic delays for authorization to build	Regulatory	 Initiate permitting process well in advance of project timelines 	• Purchase PPA and GdO in case of delay

Scope 2

Main risks associated with the Strategy (II)

	Initiative	Risk	Impacts	Prevention Actions	Impact Mitigation
	PPA/OG purchase: using Green Fuels	Shortage of quantity and higher than expected prices	More costs	 Have a broad portfolio of suppliers Offtake/ long agreements 	 Use indexed structures (PPA) Increase buy PPA/GdO (vs. Green Fuels)
	PPA/OG Purchasi ng	Decrease in wholesale prices	Lower revenues	• Choose flexible PPA structures (cap & floor, indexed)	 Define a hedging process that also takes into account the price of steel
	Use of Green Fuels (biomethane)	Delayed permitting/standards on GdO for biomethane.	Delays with respect to at floor	 Lobbying through consortium for standards to meet timelines 	 Purchase PPA/GdO in case of regulatory delay
M	Self-production	Timing for plant-grid connes- sion by Terna/ Enel.	Delays to the plan	 Negotiating penalties for delays on the connection 	 Purchase PPA/GdO in case of plant delay
N	Self-production	Delay in connecting the regional grid to the national grid (e.g., Sardinia)	Delays to plan / lower revenues	 Monitor progress and lobby for the linkage project to move forward 	 Reduce speed of development/size of plant, moving toward other project
0	Self-production	Delay in plant construction time	Delays to the plan	 Inserting penalties into contracts Continuously monitor the development 	 Purchase PPA/GdO in case of plant delay
P	PPA/OG Purchasi ng	Lack of expertise in PPA and GDO purchasing.	Delays to the plan	 Hiring specialized resources Start the purchasing process well in advance 	 Evaluate external support until skills are acquired

