

18 September 2025

Public Consultation on the ‘Proposal for the Extension of the LESS Rulebook Version 1.1’ – Information Document

Stainless Steel | Electroslag Remelting (ESR) | Ingot Casting | Forging | Tube Rolling



Background

Following the publication of the *Rulebook for the Classification System Low Emission Steel Standard (LESS)* in spring 2024, the German Steel Association (WV Stahl), together with member companies and FutureCamp Climate GmbH, initiated work in summer 2024 on proposals to expand the rulebook. These proposals aim to include additional process steps and steel grades not yet covered by the existing framework, thereby enabling certification of a broader range of products under the LESS standard.

Scope of Proposed Expansion

The first version of the LESS Rulebook includes:

- A classification system for **quality steel (QST)** and **structural steel (BST)**
- Adjustment rules for **alloying elements** and **rolling mills**

The proposed expansion introduces:

- A new classification system for **stainless steel**
- Guidelines for the following process steps:
 - **Electroslag remelting (ESR)**
 - **Ingot casting**
 - **Forging**
 - **Tube tolling**

Stakeholder Process

The LESS Rulebook was developed as part of a stakeholder process coordinated by the German Federal Ministry for Economic Affairs and Climate Action (BMWK). The further development of the LESS standard will continue to follow a broad stakeholder approach, involving:

- Academic & Scientific Institutions
- Civil Society & NGOs
- Consulting Firms and Think Tanks
- Policy Makers
- Industry Companies and Associations

This inclusive process is now being applied to the proposed expansion of the LESS Rulebook.

Consultation Procedure

The following steps are planned:

1. **Public Consultation**

The Proposal for the Extension of the LESS Rulebook Version 1.1, the public consultation feedback form and this information document can be accessed via the 'Downloads' page on the LESS website: <https://lowemissionsteelstandard.org/downloads>. The current LESS Rulebook (Version 1.1) and further technical documents about the LESS standard are also available there. The draft proposal for the extension of the LESS Rulebook is now open for public consultation. All interested parties are invited to participate and provide feedback.

2. **Advisory Board Review**

Feedback received will be evaluated by an Advisory Board composed of experts from the stakeholder groups listed above. The Advisory Board is currently being formed.

3. **Integration into the Standard**

Recommendations from the Advisory Board will be reviewed by the LESS Technical Working Group. Where recommendations cannot be implemented, a rationale will be provided.

4. **Approval by the General Assembly**

The revised Rulebook expansion will be adopted by the LESS General Assembly, which consists of LESS member companies. Each Full Member holds one vote.

5. **Publication & Application**

Once adopted, the expanded Rulebook will be published and serve as the basis for certification of the newly included products and processes under the LESS standard.

Submitting Feedback

Your constructive input is highly appreciated. You can provide feedback by filling in the public consultation feedback form in Excel format. To submit your feedback, please include the following:

- Name of the contributor
- your Organisation
- Email address

If you have any questions while preparing your feedback, please send them to info@less-aislb.org with the subject line 'Public Consultation Query'. We will endeavour to respond as quickly as possible.

Please send the completed public consultation feedback form with the subject line 'Public Consultation Feedback' to the following email address: info@less-aislb.org.

If you wish your feedback to remain confidential (i.e. not disclosed during the stakeholder process), please indicate this clearly in your submission email.

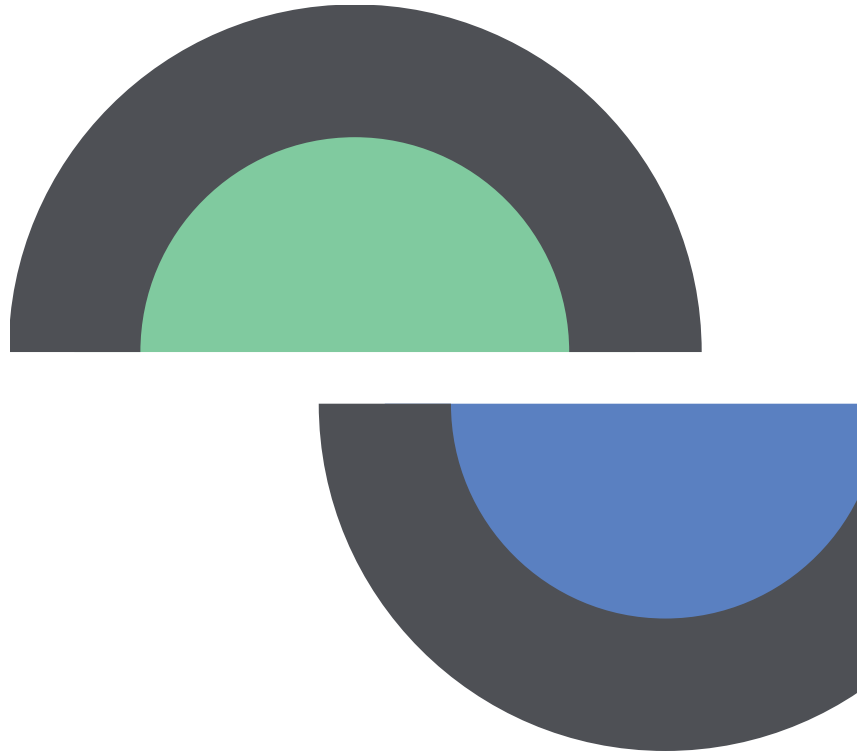
 **Deadline for submissions: November 17, 2025**

Feedback received after this date may not be considered.

We sincerely thank all participants for their valuable contributions to this important process.



Dr. Carmen Oswald, Secretary General



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