

## The #Alumina21 Campaign:

### Addressing a Material Gap in the EU Framework

The #Alumina21 campaign is a civic and policy initiative focused on a material gap in the European Union's sanctions framework concerning Russia's aluminum sector. It calls for the inclusion of alumina exports in the forthcoming 21st EU sanctions package, given that the current absence of restrictions on upstream alumina flows could undermine the effectiveness and coherence of EU sanctions policy.

*See Appendix 1. The Continuous Flow of Delivery of Alumina Directly from Aughinish to St Petersburg*

### Strategic Context

Europe's largest alumina refinery, Aughinish Alumina in County Limerick, Ireland, is owned by Rusal. Investigative reporting and publicly available trade data indicate that alumina from this facility has continued to flow into Russian industrial supply chains, where it is processed into aluminum. Concerns have been raised that aluminum produced through these channels may contribute to Russia's military-industrial complex, including the production of missile systems, drones, and other defense-related equipment used in the war against Ukraine.

*See Appendix 2. Global Supply Chain for Aughinish Alumina*

At present, the EU restricts imports of Russian aluminum, while alumina exports to Russia remain unsanctioned. This discrepancy within the current sanctions framework has prompted calls for the Commission and Member States to review whether targeted restrictions on alumina are warranted as part of a broader effort to prevent sanctions circumvention and strengthen enforcement.

As a tool for visualization of this impact;

*See Appendix 3. Alumina21 Campaign - Impact on Shahed Drone Production*

### Policy Relevance

The campaign raises several policy considerations relevant to the Commission:

- strengthening sanctions enforcement and reducing circumvention risks;
- ensuring consistency between trade flows and foreign policy objectives;
- improving transparency in strategic raw-material supply chains;
- adapting sanctions measures to evolving industrial and logistical realities.

### Balanced Implementation

Any policy response should also take into account legitimate economic and industrial concerns, including employment and regional stability. A targeted, evidence-based approach would allow the Commission and Member States to assess whether restrictions, tighter controls, or alternative compliance measures are appropriate in light of available evidence.

### Duty to Prevent

Under international law, states have a duty to prevent genocide before it is formally declared. The 1948 Genocide Convention and the ICJ's 2007 Bosnia v. Serbia ruling make clear that

this obligation is triggered the moment credible evidence of risk emerges, not after an official determination. The 2005 UN doctrine of Responsibility to Protect (R2P) reinforces this, calling on the international community to act through diplomatic, economic, or coercive means when warning signs are present. Waiting for a formal declaration is neither a legal nor a moral defense for inaction.

Multiple independent reports, legal scholars, and international experts have characterized aspects of Russia's actions in Ukraine as constituting acts of genocide or acts with genocidal characteristics. This creates grounds for discussing the obligations arising under the Genocide Convention, particularly the duty to prevent and punish.

*See Appendix 4. Supporting Documentation, Evidence of Genocide and Genocidal Intent*

## Conclusion

The #Alumina21 initiative highlights a practical sanctions-enforcement question for the European Union: whether alumina exports should remain outside the sanctions regime when evidence suggests they may enter Russian supply chains with potential military relevance. For the Commission, the issue is best framed as one of sanctions coherence, risk mitigation, and policy effectiveness.