

# France Steel Decarbonization Policy: Nuclear Advantage Meets Industrial Transformation

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## Abstract

This document analyzes France's steel decarbonization strategy within the broader European framework, highlighting the distinctive role of nuclear power in enabling low-carbon industrial transformation. With approximately 10-11 million tonnes of annual crude steel production distributed between two major integrated sites (Dunkerque and Fos-sur-Mer) and various electric arc furnace operations, France faces the challenge of maintaining strategic industrial capability while achieving ambitious climate targets. The analysis examines ArcelorMittal's €1.7 billion investment program in hydrogen-based direct reduction and electric arc furnace technologies, supported by substantial French government funding through the France 2030 initiative. France's unique positioning with 70% nuclear electricity generation creates both opportunities and constraints for steel decarbonization, offering access to low-carbon power while raising questions about hydrogen production pathways. The document explores the intersection of national industrial sovereignty concerns, EU-level policy coordination, and the pragmatic realities of transforming legacy blast furnace sites in an era of intense global competition from Chinese overcapacity.

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# 1 Strategic Context: France's Steel Industry Profile

## 1.1 Production Landscape and Current Structure

France's steel industry represents a mid-sized but strategically significant component of European steel production:

### **2024 Production Data:**

- Total crude steel production: 10.8 million tonnes (9% of EU total)
- Global ranking: Approximately 19th among steel-producing nations
- Recent trend: 17.4% production decline in 2023 vs. 2022; continued weakness in 2024

### **Technology Distribution:**

- Integrated BF-BOF route: Approximately 66% of production
- Electric arc furnace route: Approximately 33% of production (one-third from recycling)
- Notable contrast with EU average (60% BF-BOF, 40% EAF)

### **Geographic Concentration:**

#### *Primary integrated sites (ArcelorMittal):*

- Dunkerque (Hauts-de-France): Europe's largest single steel production site, three blast furnaces, approximately 7 million tonnes annual capacity
- Fos-sur-Mer (Bouches-du-Rhône): Mediterranean coastal location, two blast furnaces, approximately 2.5 million tonnes capacity

#### *Secondary EAF operations:*

- Various sites including Swiss Steel Group operations (Ugitech Ugine)
- Smaller specialized producers focusing on long products and specialty steels

## 1.2 Economic and Strategic Significance

### **Employment and Industrial Ecosystem:**

- Direct employment: Approximately 20,000 workers in steel production
- Dunkerque site alone: 6,000+ employees plus extensive contractor workforce
- Fos-sur-Mer site: 2,500 direct employees, 1,500 contractors
- Significant regional economic dependencies in northern and southern France

### **Value Chain Integration:**

- Major consumers: Construction (35%), automotive (25%), mechanical engineering (20%), other sectors (20%)
- Critical supplier to French automotive industry (Renault, Stellantis subsidiaries)
- Construction sector dependency for infrastructure development
- Emerging demand sectors: Renewable energy infrastructure (wind, solar), hydrogen and CO<sub>2</sub> pipeline networks

### **Strategic Sovereignty Concerns:**

- National defense: Domestic steel capacity essential for military applications
- Industrial autonomy: Dependency on imports raises economic security questions
- Technology leadership: Competition with China in green steel innovation
- Trade balance: Net steel importer status creates vulnerability to supply disruptions

## **1.3 Emissions Profile and Climate Challenge**

### **Current Emissions Status:**

- Steel industry emissions: 18% of thermal energy consumption in French industry
- CO<sub>2</sub> emissions: 22% of French industrial greenhouse gas emissions
- ArcelorMittal sites alone: 25% of French industrial GHG emissions (approximately 19-20 million tonnes CO<sub>2</sub> annually)
- Emission intensity: 90% of impact concentrated in blast furnace operations

### **National Climate Targets:**

- France committed to 35% industrial emissions reduction by 2030 (vs. recent baseline)
- Steel sector must contribute proportionally: Cannot achieve national target without steel decarbonization
- 2050 carbon neutrality: Requires near-complete elimination of blast furnace emissions
- Alignment with Paris Agreement: Steel transformation central to climate credibility

## **2 French Policy Architecture for Steel Decarbonization**

### **2.1 Institutional Framework**

France's steel policy operates within a complex multi-level governance structure:

#### **National Level Actors:**

##### *Ministry of Economy, Finance and Industrial Sovereignty:*

- Strategic industrial policy development and coordination
- State aid authorization and financial support mechanisms
- Industrial competitiveness protection measures
- Negotiation with EU Commission on support packages

##### *Ministry of Ecological Transition:*

- Climate policy integration and emissions targets
- Environmental permitting for industrial transformations
- Coordination with EU-level climate frameworks
- Monitoring and reporting of industrial emissions

*ADEME (Agency for Ecological Transition):*

- Technical expertise and project evaluation
- Funding mechanism administration
- Research and development support
- Technology assessment and roadmap development

**Regional Level:**

- Hauts-de-France Region: Economic development support for Dunkerque transformation
- Provence-Alpes-Côte d'Azur Region: Regional planning and support for Fos-sur-Mer
- Port authorities: Infrastructure coordination for hydrogen and material logistics

**EU Level Integration:**

- State aid approval: Commission scrutiny of national support measures
- ETS and CBAM: EU-wide carbon pricing and border adjustment
- Innovation Fund: Co-funding for large-scale decarbonization projects
- Single Market rules: Ensuring non-distortive support while enabling transformation

## 2.2 France 2030: The Flagship Industrial Program

**Program Overview:**

France 2030 represents the French government's comprehensive industrial strategy, allocating €54 billion to accelerate innovation and decarbonization across strategic sectors.

*Steel-Relevant Objectives:*

- Industrial decarbonization: Specific envelope for hard-to-abate sectors
- Hydrogen economy development: €9 billion for green and low-carbon hydrogen
- Innovation and competitiveness: Support for breakthrough technologies
- Strategic autonomy: Reducing dependencies on critical supply chains

**Steel Sector Support Mechanisms:**

*Direct Investment Support:*

- ArcelorMittal package: Up to €850 million in state aid for Dunkerque transformation (approved by EU Commission)
- Additional support anticipated for Fos-sur-Mer EAF project
- Structured as tranches payments conditional on investment milestones
- Co-financing model: State support complements private investment

*Hydrogen Infrastructure:*

- Electrolyzer deployment: Support for industrial-scale hydrogen production
- Network development: Pipeline infrastructure connecting production and consumption
- Technology development: Research funding for improved efficiency and cost reduction

#### *Electricity Price Stabilization:*

- Long-term contracts: Negotiations with EDF for predictable industrial electricity pricing
- Power purchase agreements: Framework for renewable electricity supply
- Grid modernization: Investment in transmission capacity for increased industrial demand

### **2.3 Coordination with EU Policy Frameworks**

#### **Innovation Fund Integration:**

While France 2030 provides national-level support, EU Innovation Fund plays complementary role:

- Large-scale project calls: French projects compete for EU co-funding
- Additionality principle: EU funds supplement rather than replace national support
- Cross-border projects: Potential for French participation in multi-country initiatives

#### **State Aid Compliance:**

French support navigates complex EU competition law:

- Important Projects of Common European Interest (IPCEI): France participating in hydrogen IPCEI enabling flexible state aid rules
- Temporary Crisis and Transition Framework: Extended flexibility for green industrial investments
- Proportionality assessment: Demonstrating support level necessary but not excessive
- Transparency requirements: Public disclosure of aid amounts and conditions

#### **ETS and CBAM Implications:**

French steel transformation occurs within EU carbon pricing architecture:

- Free allocation phase-out: Declining free ETS allowances increasing transformation urgency
- CBAM introduction (2026): Creating level playing field against imports but requiring domestic transformation
- Carbon price impact: Rising ETS prices (€60-90/tonne CO<sub>2</sub>) creating business case for decarbonization
- Export competitiveness: CBAM addresses only imports; French exports still face competitiveness challenges

## **3 ArcelorMittal's Transformation Strategy: The €1.7 Billion Investment**

### **3.1 Strategic Vision and Timeline**

ArcelorMittal's French decarbonization program, announced in 2022 and refined through 2024, represents the most significant steel industry transformation in France's modern history.

#### **Headline Commitments:**

- Total investment: €1.7 billion by 2030

- Emissions reduction: 40% reduction (7.8 million tonnes CO<sub>2</sub> annually) by 2030
- National impact: 10% reduction in French manufacturing sector GHG emissions
- Capacity maintenance: Equivalent production capacity despite closure of three blast furnaces
- Employment: Commitment to maintain employment levels through transformation

#### **Implementation Timeline:**

- 2022-2024: Planning, permitting, financing negotiations
- 2025-2027: Construction and installation phase
- 2027-2028: Commissioning and ramp-up
- 2028-2030: Progressive blast furnace shutdowns and full operational transition

### **3.2 Dunkerque Transformation: Hydrogen-Based DRI**

The Dunkerque site transformation represents Europe's largest single steel decarbonization project:

#### **Technical Configuration:**

##### *Direct Reduced Iron (DRI) Unit:*

- Capacity: 2.5 million tonnes DRI annually
- Technology: Gas-based DRI initially, hydrogen-ready design
- Phase 1 (2027-2030): Natural gas operation with gradual hydrogen blending
- Phase 2 (post-2030): Progressive transition to 100% green hydrogen
- Innovation: Coupling DRI with “innovative technology electric furnace” (details proprietary)

##### *Electric Arc Furnaces:*

- Two new EAFs: One integrated with DRI unit, one standalone for scrap recycling
- Combined capacity: Equivalent to two blast furnaces being replaced
- Feedstock flexibility: Capability to process DRI, scrap, or combinations
- Power demand: Significant increase in electricity consumption (approximately 2.5x site current usage)

##### *Blast Furnace Rationalization:*

- Current configuration: Three blast furnaces at Dunkerque
- Transformation: Two blast furnaces to be permanently closed by 2030
- Retained capacity: One blast furnace continues operation (potentially subject to further decarbonization measures)
- Rationale: Balancing transformation pace with market demand and technical risk

#### **Hydrogen Supply Challenge:**

The Dunkerque DRI project's viability depends critically on hydrogen availability:

##### *Short-term (2027-2030):*

- Primary fuel: Natural gas (reducing CO<sub>2</sub> by approximately 30-40% vs. blast furnace)
- Early hydrogen blending: Gradual introduction as supplies become available
- Supplier negotiations: Discussions with Air Liquide and others for initial volumes

*Long-term (post-2030):*

- Target: 100% green hydrogen utilization
- Volume requirement: Approximately 250,000-300,000 tonnes H<sub>2</sub> annually for full DRI operation
- Production pathway: Electrolysis using low-carbon electricity (nuclear or renewable)
- Infrastructure needs: Dedicated hydrogen pipeline from production to Dunkerque

*Supply Uncertainty:*

Hydrogen supply represents the single largest risk to the project:

- H2V Dunkerque project: 200 MW electrolyzer project placed “on hold” due to ArcelorMittal project delays and high gas prices in Europe
- Cost challenge: Green hydrogen production costs currently 3-5x natural gas on energy-equivalent basis
- Market development: Chicken-and-egg problem of demand and supply development
- Import option: Potential for hydrogen imports via port of Dunkerque if domestic production insufficient

### **Electricity Supply and Pricing:**

The transformation dramatically increases electricity demand:

*Consumption Profile:*

- Current Dunkerque electricity use: Approximately 1.5-2 TWh annually
- Post-transformation: Approximately 4-5 TWh annually (EAFs + hydrogen production if local)
- National context: ArcelorMittal’s total French electricity demand to increase 2.5x

*Pricing and Competitiveness:*

- Critical factor: Electricity price competitiveness essential for project viability
- EDF negotiations: Long-term power purchase agreement discussions ongoing
- Nuclear advantage: France’s 70% nuclear generation potentially enabling lower, more stable prices
- Market volatility: Recent European electricity price spikes creating uncertainty

### 3.3 Fos-sur-Mer Transformation: Circular Steel Focus

The Fos-sur-Mer site transformation emphasizes scrap-based circular economy approach:

#### **Technical Configuration:**

##### *Electric Arc Furnace:*

- New EAF installation: Replacing one of two blast furnaces
- Capacity: Approximately 1.5-2 million tonnes annually
- Feedstock: Primarily scrap steel (ferrous scrap collection and processing)
- Complementary equipment: “Ladle furnace” for steel reheating and quality control (France Relance funding, operational 2023)

##### *Blast Furnace Rationalization:*

- Current: Two blast furnaces
- Transformation: One blast furnace closed, one retained (at least medium term)
- Production maintenance: EAF compensates for closed blast furnace capacity
- Flexibility: Retained blast furnace provides buffer during transition

#### **Circular Economy Strategy:**

Fos-sur-Mer positioned as “reference site for circular steel production”:

##### *Scrap Supply Chain:*

- Regional collection: Mediterranean basin scrap collection network
- Quality challenges: Tramp element control (copper, tin contamination)
- Import potential: High-quality scrap imports if domestic supply insufficient
- Trade dynamics: Balancing French scrap exports (to Turkey, etc.) with domestic utilization

##### *Emissions Profile:*

- EAF emissions: 300-700 kg CO<sub>2</sub> per tonne steel (vs. 2000 kg for blast furnace)
- Electricity source: Low-carbon French grid (70% nuclear) further reducing emissions
- Circular benefits: Avoided mining and primary processing emissions
- Life cycle advantage: Significantly lower total environmental impact

### 3.4 Second Phase: Carbon Capture and Long-term Neutrality

ArcelorMittal explicitly frames current investments as “Phase 1” toward 2050 carbon neutrality:

#### **Carbon Capture, Utilization and Storage (CCUS):**

##### *Smart Carbon Usage:*

- Fos-sur-Mer pilot: Collaboration with LanzaTech on biological CO<sub>2</sub> conversion
- Technology: Capturing blast furnace gases, converting to ethanol via fermentation
- Applications: Biocarbon for chemical industry or biofuels
- Gant (Belgium) precedent: First Carbalyist facility under construction, Fos as potential second

*Geological Storage:*

- Dunkerque location: Proximity to potential North Sea CO<sub>2</sub> storage sites
- Infrastructure needs: CO<sub>2</sub> pipeline to coast, injection facilities
- Cost uncertainty: CCUS economics depend on carbon price and technology maturation
- Regulatory framework: EU and French CCUS regulations still developing

**Technology Contingency:**

ArcelorMittal carefully hedges on CCUS:

- Conditional language: “Assuming technology matures and regulation ensures economic viability”
- Risk acknowledgment: CCUS not proven at steel industry scale
- Fallback position: Hydrogen and circularity as primary pathways, CCUS as supplement
- 2050 pathway: Multiple technology combinations possible depending on developments

## 4 France’s Nuclear Advantage: Electricity and Hydrogen

### 4.1 Nuclear Fleet and Low-Carbon Electricity

France’s distinctive energy profile creates unique conditions for steel decarbonization:

**Current Nuclear Capacity:**

- Total nuclear capacity: Approximately 61 GW across 56 reactors
- Electricity generation: 70% nuclear, 12% hydro, 10% wind/solar, 8% gas/other (2024 approximate)
- Grid carbon intensity: Among lowest in Europe at approximately 60 g CO<sub>2</sub>/kWh
- Baseload character: High availability factor enabling stable industrial supply

**Implications for Steel:**

*EAF Operations:*

- Emissions intensity: Nuclear-powered EAF produces steel at 50-100 kg CO<sub>2</sub>/tonne (vs. 300-500 kg with fossil grid)
- Competitive advantage: Lower operational emissions improve CBAM position
- Cost profile: Nuclear electricity potentially more stable pricing than gas-dependent systems

*Hydrogen Production:*

- “Low-carbon hydrogen” pathway: Electrolysis using nuclear electricity
- Carbon intensity: Comparable to renewable hydrogen (“pink” or “yellow” hydrogen)
- EU taxonomy debate: Nuclear included in sustainable finance taxonomy, enabling investment
- Scale potential: Large nuclear fleet enables substantial hydrogen production without renewable capacity constraints

## 4.2 Nuclear-Based Hydrogen: Opportunity and Controversy

France explicitly positions nuclear hydrogen as strategic advantage:

### **Policy Framework:**

#### *National Hydrogen Strategy:*

- Total envelope: €9 billion for hydrogen within France 2030
- Technology neutrality: Support for both renewable and nuclear pathways
- Pragmatic approach: Emphasis on emission reduction regardless of electricity source
- Industrial focus: Prioritizing hard-to-abate sectors like steel

#### *EU-Level Advocacy:*

- French position: Nuclear hydrogen should qualify as “low-carbon” alongside renewable
- Renewable Energy Directive: Negotiation on hydrogen definitions and certification
- Additionality debate: Requirements for dedicated renewable capacity vs. grid electricity use
- Partial success: EU rules accommodate nuclear hydrogen under specific conditions

### **Technical and Economic Considerations:**

#### *Advantages:*

- Baseload supply: Nuclear enables 24/7 electrolyzer operation (80-90% capacity factor vs. 30-40% for wind/solar)
- Cost profile: Higher capacity factor reduces per-kg hydrogen cost despite potentially higher electricity price
- Existing infrastructure: Utilizing installed nuclear capacity rather than requiring new renewable buildup
- Grid stability: Avoiding intermittency challenges of renewable-only approach

#### *Challenges and Criticisms:*

- Renewable opportunity cost: Nuclear electricity use for hydrogen means less available for grid decarbonization
- Long-term sustainability: Aging nuclear fleet requires massive reinvestment; new nuclear (EPR2) expensive and delayed
- Public acceptance: Nuclear skepticism in some EU countries creating market acceptance issues
- Certification complexity: Tracking and certifying “nuclear hydrogen” in international trade

### **ArcelorMittal’s Approach:**

Steel producer maintains technology optionality:

- Partnership strategy: Collaboration with Air Liquide and others for hydrogen supply
- Source flexibility: Accepting green (renewable) or low-carbon (nuclear) hydrogen
- Pragmatic focus: Prioritizing cost and availability over production pathway purity
- Market positioning: Emphasizing carbon intensity of final steel product regardless of upstream pathway

## 5 Competitive and Geopolitical Context

### 5.1 Chinese Overcapacity and Trade Challenges

France's steel transformation occurs against backdrop of severe global market distortions:

#### **China Challenge:**

##### *Overcapacity Dynamics:*

- Chinese production: >1 billion tonnes annually vs. approximately 900 million domestic demand
- Export pressure: 100+ million tonnes potential export capacity seeking markets
- Price distortions: Chinese steel exports often priced below production cost
- State subsidies: Opaque support enabling economically irrational exports

##### *Impact on French Industry:*

- Import penetration: Increasing Chinese and third-country (circumvention) imports
- Margin compression: Downward pressure on prices undermining investment business case
- Capacity utilization: French mills operating below optimal levels due to import competition
- Investment risk: Uncertainty about future competitiveness delaying transformation decisions

#### **EU Trade Defense Measures:**

##### *Anti-dumping and Safeguards:*

- Product-specific duties: Anti-dumping measures on various Chinese steel products
- Safeguard quotas: EU-wide import limits for surge protection
- Circumvention monitoring: Addressing re-routing through third countries
- Effectiveness questions: Sophisticated circumvention undermining protection

##### *CBAM as Strategic Tool:*

- French support: Strong advocacy for rapid and comprehensive CBAM implementation
- Competitiveness protection: Border adjustment addressing carbon cost differential
- Expansion advocacy: French position supporting CBAM extension to downstream products
- Level playing field: Viewing CBAM as essential for viable domestic steel production

### 5.2 French Domestic Political Economy

Steel transformation intertwines with broader French political dynamics:

#### **Regional Politics:**

##### *Hauts-de-France (Dunkerque):*

- Historical context: Former industrial heartland with legacy of coal mining and steel
- Employment sensitivity: Steel jobs politically critical in region with high unemployment
- Local support: Regional government strongly backing transformation investments

- Just transition needs: Workforce retraining and social support essential for political viability

*Provence-Alpes-Côte d'Azur (Fos-sur-Mer):*

- Environmental concerns: Local opposition to industrial emissions in Mediterranean region
- Economic dependency: Port of Fos and steel industry anchor for regional employment
- Transformation opportunity: Circular steel narrative potentially building local support
- Urban-industrial tension: Balancing Marseille metropolitan environmental priorities with industrial employment

#### **National Sovereignty Discourse:**

French political culture emphasizes industrial sovereignty:

*Historical Memory:*

- Florange crisis (2012): ArcelorMittal blast furnace closures became national political crisis
- State intervention tradition: French government history of industrial policy activism
- Strategic sectors: Steel viewed alongside aerospace, nuclear, defense as sovereignty-critical

*Contemporary Framing:*

- “Made in France”: Political emphasis on domestic production retention
- Technology leadership: Competition with China framed as technological sovereignty issue
- Climate and competitiveness: Rejecting false choice, seeking “both-and” solutions
- European dimension: French leadership in pushing EU-level industrial strategy

### **5.3 Transatlantic Competition and Cooperation**

#### **US Inflation Reduction Act (IRA) Impact:**

American industrial policy creates challenges and opportunities:

*Competitive Pressure:*

- Investment diversion risk: Generous US tax credits potentially attracting projects away from Europe
- Subsidy competition: Pressure on EU to match or exceed US support levels
- Technology migration: Risk of innovation and manufacturing shifting to North America

*EU Response:*

- State aid flexibility: Relaxation of EU competition rules in response to IRA
- France 2030 acceleration: National programs partially responding to US challenge
- Coordination efforts: EU-US Trade and Technology Council dialogues on steel cooperation

#### **Technology and Standards Cooperation:**

*Transatlantic Initiatives:*

- Green steel standards: Efforts toward harmonized carbon intensity measurement
- Technology sharing: Collaborative research on hydrogen DRI and CCUS
- Market coordination: Addressing global overcapacity through coordinated policies

## 6 Technology Pathways and Research Priorities

### 6.1 Hydrogen Steelmaking Ecosystem

Beyond ArcelorMittal's large-scale transformation, France developing broader hydrogen steel ecosystem:

#### **GravitHy Project:**

French startup GravitHy represents innovative approach:

##### *Technology:*

- Integrated H<sub>2</sub>-DRI process: Producing Hot Briquetted Iron (HBI) using 100% hydrogen
- Premium product: HBI as high-quality DRI suitable for long-distance shipping
- Modular design: Smaller-scale units potentially enabling distributed production

##### *Recognition and Potential:*

- World Economic Forum: Top-ranked entry in First Movers Coalition near-zero steel enabling technologies challenge
- Commercialization path: Progressing from concept toward pilot and demonstration scale
- Export potential: Technology licensable to other markets if successful

#### **Research Infrastructure:**

##### *Academic and Research Institutions:*

- University collaborations: Materials science and process engineering research
- CEA (Atomic Energy Commission): Hydrogen production and storage technologies
- CNRS laboratories: Fundamental research on hydrogen metallurgy

##### *Priority Research Areas:*

- Hydrogen embrittlement: Understanding and mitigating steel quality impacts
- Process optimization: Maximizing hydrogen utilization efficiency in DRI
- Equipment materials: Developing materials resistant to hydrogen environment
- Integration challenges: Coupling hydrogen production, storage, and utilization

### 6.2 Scrap-Based Steel and Circular Economy

France advancing scrap utilization alongside primary steel decarbonization:

#### **Current Scrap Dynamics:**

##### *Supply Profile:*

- Generation: Approximately 10-12 million tonnes ferrous scrap generated annually in France
- Collection rate: 85-90% recovery rate (among highest in Europe)
- Trade patterns: France historically net exporter of scrap (to Turkey, Spain, Italy)
- Quality distribution: Mix of high-quality industrial scrap and lower-grade post-consumer scrap

##### *Utilization Potential:*

- Current EAF consumption: Approximately 3-4 million tonnes domestically processed
- Expansion opportunity: Fos-sur-Mer and other EAF projects increasing domestic utilization
- Import-export rebalancing: Reduced exports, potentially increased high-quality scrap imports

### **Circular Economy Strategy:**

#### *Policy Support:*

- EU Circular Economy Action Plan: French implementation emphasizing steel recycling
- Extended Producer Responsibility: Potential for construction and automotive sectors
- Waste hierarchy: Prioritizing high-value recycling over downcycling or disposal

#### *Technology and Innovation:*

- Advanced sorting: Sensor-based separation improving scrap quality
- Tramp element removal: Research on removing copper, tin from scrap
- Digital product passports: Tracking steel composition through value chain
- Design for recycling: Engagement with steel-using sectors on recyclability

## **6.3 Carbon Capture and Smart Carbon**

While hydrogen and circularity are primary pathways, France maintaining CCUS optionality:

### **Smart Carbon Usage:**

#### *Biological Conversion Approach:*

- LanzaTech collaboration: ArcelorMittal partnership on gas fermentation technology
- Process: Capturing blast furnace CO and CO<sub>2</sub>, converting via microbial fermentation
- Products: Ethanol (for chemicals or biofuels), potentially other carbon-based chemicals
- Fos-sur-Mer pilot: Potential second Carbalyist facility after Gand (Belgium)

#### *Economic and Environmental Logic:*

- Value creation: Converting waste gas to saleable product improves economics vs. pure capture
- Emissions accounting: Converted carbon counts as utilization, potentially creating carbon credits
- Transitional technology: Applicable to remaining blast furnaces during hydrogen transition
- Scalability questions: Limited by market for carbon-based products from steel sector

### **Geological Storage Potential:**

#### *Storage Opportunities:*

- North Sea proximity: Dunkerque location enables access to offshore storage sites
- Infrastructure needs: CO<sub>2</sub> pipeline to coast, ship or pipeline to storage locations
- Regulatory framework: French CCS law (2021) providing legal basis

- Cross-border coordination: Potential participation in Northern Lights or other multi-country projects

*French CCUS Policy:*

- National strategy: CCUS included in climate roadmaps as transitional technology
- Onshore storage: Exploration of depleted gas fields in Paris Basin and Aquitaine
- CO<sub>2</sub> transport networks: Planning for industrial cluster connections
- Public acceptance: Social license challenges requiring transparent communication

## 7 Social Dimensions and Just Transition

### 7.1 Workforce Transformation

Steel decarbonization requires massive workforce adaptation:

**Employment Impact Assessment:**

*Direct Employment:*

- ArcelorMittal commitment: Maintain overall employment levels during transformation
- Job character change: Shift from blast furnace operations to EAF and DRI operations
- Skills gap: New technologies requiring different competencies
- Contractor workforce: Significant construction employment during transformation phase

*Job Quality and Skills:*

- Automation impact: DRI and EAF operations potentially more automated than traditional blast furnaces
- Higher skill requirements: Hydrogen handling, advanced process control, digital systems
- Safety considerations: New hazards (hydrogen) requiring specialized training
- Career pathways: Opportunities for younger workers with digital skills

**Training and Retraining Programs:**

*Industry-Led Initiatives:*

- Internal training: ArcelorMittal programs for transitioning workforce
- Apprenticeships: Partnerships with technical schools for future workforce
- Cross-site learning: Knowledge transfer from sites already operating EAF technology
- International exchanges: Learning from hydrogen steelmaking pioneers (Sweden, etc.)

*Public Support:*

- France 2030 skills component: Funding for industrial workforce training
- Regional programs: Hauts-de-France and PACA regional training initiatives
- National education policy: Coordination with technical education institutions
- Social dialogue: Union involvement in designing transition pathways

## 7.2 Regional Economic Development

Steel transformation interwoven with broader regional development strategies:

### Dunkerque Industrial Cluster:

#### *Port and Logistics:*

- Port infrastructure: France's third-largest port, critical for iron ore imports
- Hydrogen hub vision: Positioning Dunkerque as hydrogen import and distribution center
- Industrial synergies: Opportunities for hydrogen sharing among port industries
- Offshore wind connection: Integration with North Sea renewable energy developments

#### *Regional Development Strategy:*

- Economic diversification: Balancing steel centrality with new industries
- Green industry attraction: Leveraging hydrogen infrastructure to attract battery, renewable energy sectors
- Urban regeneration: Connection between industrial transformation and city development
- Cross-border dimension: Coordination with Belgian port-industrial clusters

### Fos-sur-Mer Industrial-Environmental Balance:

#### *Environmental Justice:*

- Historical pollution: Legacy of decades of heavy industry creating local health concerns
- Transformation opportunity: EAF transition reducing local air pollutants
- Community engagement: Necessity of local support for project social license
- Benefit sharing: Ensuring local communities benefit from green transition

#### *Mediterranean Economic Development:*

- Port of Marseille-Fos: Second-largest French port, strategic Mediterranean gateway
- Circular economy hub: Positioning site as exemplar of industrial circularity
- Tourism-industry coexistence: Managing tensions in region with major tourism sector
- Solar potential: Southern France solar resources for renewable electricity and hydrogen

## 8 Future Scenarios and Critical Uncertainties

### 8.1 Scenario Analysis: French Steel in 2050

#### Scenario 1: Green Leadership Success

##### *Pathway:*

- 2030: ArcelorMittal transformation completed on schedule, 40% emissions reduction achieved
- 2035: Hydrogen DRI fully operational at 100% green hydrogen, Fos EAF expanded
- 2040: Additional DRI capacity at Dunkerque, third blast furnace converted or closed
- 2050: Near-zero emissions steel production, 10-12 million tonnes capacity maintained

*Enabling Factors:*

- Abundant low-cost hydrogen from nuclear and renewable sources
- Effective CBAM protection enabling investment recovery
- Strong domestic and EU market for green steel premium products
- Technology leadership enabling export of French know-how
- Successful workforce transition with maintained employment

*Outcomes:*

- France as European green steel leader
- Industrial sovereignty maintained in critical sector
- Export competitiveness in high-value green steel products
- Dunkerque and Fos as model industrial transformation sites

**Scenario 2: Managed Transition with Import Dependence**

*Pathway:*

- 2030: Transformation partially completed, hydrogen supply constraints causing delays
- 2035: Dunkerque DRI operating on natural gas with limited hydrogen blending
- 2040: Fos EAF successful, but Dunkerque competitiveness challenges lead to capacity reductions
- 2050: 6-8 million tonnes domestic production, increased reliance on imports

*Enabling Factors:*

- Hydrogen scarcity and high costs limiting full decarbonization
- CBAM effectiveness limited by circumvention or political weakening
- Chinese and other imports capturing French market share
- Social and political pressures slowing transformation pace

*Outcomes:*

- Partial deindustrialization of French steel sector
- Strategic autonomy concerns regarding supply security
- Maintained specialty steel production in niches
- Significant job losses in steel sector despite transition efforts

**Scenario 3: Accelerated Decline**

*Pathway:*

- 2030: Transformation delays and cost overruns undermining business case
- 2035: ArcelorMittal divests from France or drastically cuts capacity
- 2040: Only limited EAF specialty production remains

- 2050: France primarily steel importer with minimal domestic production

*Enabling Factors:*

- Energy cost crisis making French production uncompetitive
- CBAM failure or WTO challenges dismantling protection
- Global overcapacity intensifying with Chinese exports
- Political instability disrupting long-term industrial policy

*Outcomes:*

- Loss of strategic industrial capability
- Severe regional economic disruption in Dunkerque and Fos
- French manufacturing competitiveness severely impaired
- Climate target achievement through production offshoring (carbon leakage)

## 8.2 Critical Success Factors

### Hydrogen Ecosystem Development:

Most critical determinant of success:

- Electrolyzer deployment: Large-scale hydrogen production infrastructure construction
- Cost trajectory: Achieving cost parity or near-parity with natural gas by mid-2030s
- Regulatory framework: Stable, supportive policy for hydrogen investments
- Infrastructure: Pipeline and distribution networks enabling large-scale utilization

### Competitive Protection Mechanisms:

Preventing carbon leakage and import displacement:

- CBAM effectiveness: Comprehensive coverage and enforcement preventing circumvention
- Duration of support: Maintaining competitiveness protection through full transformation period
- Export measures: Addressing competitiveness for French steel exports outside EU
- Fair competition: Effective action against Chinese dumping and subsidies

### Electricity Price Competitiveness:

Foundation of electric steel viability:

- Long-term contracts: Stable pricing enabling investment planning
- Nuclear fleet maintenance: Sustaining low-carbon baseload generation
- Grid infrastructure: Transmission capacity and reliability for large industrial loads
- Market design: Ensuring industrial consumers benefit from low-carbon electricity

### Social License and Political Sustainability:

Maintaining public and political support:

- Just transition credibility: Delivering on workforce and community commitments

- Transparent communication: Honest assessment of challenges and progress
- Regional development: Tangible benefits for Dunkerque and Fos communities
- National narrative: Sustaining political commitment across electoral cycles

**Technology Performance:**

Delivering on technical promises:

- DRI-EAF operation: Achieving planned production levels and quality
- Hydrogen utilization: Successfully ramping to 100% hydrogen operation
- Cost control: Preventing massive cost overruns undermining business case
- Innovation: Continuous improvement and problem-solving during ramp-up

## 9 Conclusions: France's Steel Transformation in Context

### 9.1 Distinctive French Approach

France's steel decarbonization strategy exhibits several distinctive characteristics:

**Nuclear Advantage as Foundation:**

- Low-carbon electricity: 70% nuclear grid enabling low-emission EAF operations
- Hydrogen pathway: Nuclear-based hydrogen production as strategic asset
- Long-term perspective: Betting on sustained nuclear fleet through major reinvestment
- Policy advocacy: Using nuclear position to influence EU hydrogen and electricity policy

**Coordinated Public-Private Partnership:**

- State support: Substantial public funding (€850+ million) enabling transformation
- Private leadership: ArcelorMittal driving technical strategy and execution
- Risk sharing: Public support de-risking private investment in uncertain technologies
- Conditionality: State aid tied to concrete milestones and commitments

**Scale and Concentration:**

- Two major sites: Concentration of production enabling focused transformation efforts
- Single operator dominance: ArcelorMittal's position simplifying coordination
- Critical mass: Large-scale projects potentially achieving better economics than dispersed small projects
- Vulnerability: Heavy dependence on single company's strategy and viability

## 9.2 Integration with EU Frameworks

French strategy both influences and is constrained by European policy:

### **Policy Leadership:**

- Industrial strategy: French advocacy for robust EU industrial policy
- CBAM support: Strong backing for trade protection mechanisms
- Hydrogen regulation: Influencing definitions to accommodate nuclear pathway
- State aid flexibility: Pushing for enhanced ability to support strategic sectors

### **Dependency on EU Success:**

- Single market: French steel viability depends on healthy EU market
- Regulatory alignment: Cannot succeed if EU policy undermines competitiveness
- Fiscal constraints: EU state aid rules limit French support options
- Collective action: Free-rider problems if other member states fail to transform

## 9.3 Global Competitive Context

French transformation occurs within intensely competitive global environment:

### **China Challenge:**

- Overcapacity threat: Chinese exports potentially overwhelming French market
- Technology race: China simultaneously pursuing green steel innovation at massive scale
- Cost competition: Chinese state support enabling below-cost exports
- Market access asymmetry: Chinese market largely closed while Europe remains open

### **Transatlantic Dynamics:**

- US competition: IRA creating competitive pressure for green steel investments
- Technology cooperation: Potential for joint R&D and standard-setting
- Market coordination: Shared interest in addressing Chinese overcapacity
- Regulatory alignment: Efforts toward harmonized carbon intensity metrics and green steel definitions

### **Emerging Producers:**

- Low-cost competition: Steel production expanding in Middle East, Southeast Asia leveraging cheap energy
- Technology adoption: Newer producers potentially leapfrogging to green technologies
- Market dynamics: French exports facing increasing competition in third markets

## 9.4 Implications for Steel Research and Innovation

France's transformation creates significant implications for research community:

### **Priority Research Areas:**

#### *Hydrogen Metallurgy:*

- DRI optimization: Maximizing hydrogen efficiency and throughput
- Product quality: Understanding impacts on steel properties and applications
- Process integration: Coupling hydrogen production, DRI, and EAF operations
- Equipment materials: Materials science for hydrogen-compatible equipment

#### *Scrap Metallurgy:*

- Tramp element management: Removing or mitigating copper, tin contamination
- Scrap characterization: Rapid, accurate analysis for quality control
- Product design: Design for recycling principles in steel-using sectors
- Life cycle optimization: Maximizing value retention through multiple cycles

#### *Nuclear-Steel Integration:*

- Electrolyzer optimization: Improving efficiency and reducing costs for nuclear-powered hydrogen
- Load flexibility: Managing industrial demand relative to nuclear baseload characteristics
- Heat integration: Potential for utilizing nuclear waste heat in industrial processes
- System modeling: Integrated analysis of nuclear-hydrogen-steel systems

#### *Carbon Utilization:*

- Biological conversion: Improving efficiency and product range of gas fermentation
- Chemical pathways: Alternative routes for converting steel industry CO and CO<sub>2</sub>
- Economic viability: Business model development for carbon utilization products
- Life cycle assessment: Rigorous evaluation of net climate benefits

### **Research Infrastructure and Collaboration:**

#### *National Initiatives:*

- University partnerships: Industry collaboration with engineering schools
- CNRS laboratories: Fundamental research on materials and processes
- CEA contributions: Nuclear-industrial integration research
- Pilot facilities: Demonstration-scale testing infrastructure

#### *European Dimension:*

- Horizon Europe: French participation in Clean Steel Partnership and related programs
- Cross-border collaboration: Projects with German, Swedish, Belgian partners

- RFCS legacy: Transitioning established research relationships into new frameworks
- ESTEP engagement: Strategic research agenda development

*International Partnerships:*

- IEA collaboration: Participation in global technology roadmaps
- Bilateral exchanges: Research cooperation with US, Japan, others
- Developing country engagement: Technology transfer and capacity building
- Standards development: Contributing to international green steel standards

## 9.5 Final Reflections

France's steel decarbonization represents a critical test case for industrial transformation in advanced economies:

**Significance Beyond Steel:**

The outcomes will influence:

- Industrial policy credibility: Demonstrating whether state-supported transformation can succeed
- Climate-competitiveness integration: Testing if deep decarbonization and industrial viability are compatible
- Nuclear role: Validating or questioning nuclear energy's contribution to industrial decarbonization
- European industrial model: Informing broader EU approach to maintaining manufacturing base while achieving climate goals

**Timeline Criticality:**

The next 5-7 years are decisive:

- 2025-2027: Construction and commissioning determining if technical approach is sound
- 2027-2030: Operational ramp-up revealing whether economics and hydrogen supply materialize
- 2030-2035: Scale-up phase determining if model is replicable and sustainable
- Post-2035: Long-term viability and potential for further transformation or decline

**Lessons for Global Decarbonization:**

France's experience will inform steel transformation worldwide:

- Hydrogen-DRI pathway: Validating technology and economics at commercial scale
- Nuclear hydrogen: Testing viability of low-carbon hydrogen from nuclear electricity
- Public support models: Demonstrating effective or ineffective support mechanisms
- Social transition: Identifying successful or failed approaches to workforce and community transformation

The French steel industry stands at an inflection point. Success would position France as a green steel leader with maintained industrial capability and technological sovereignty. Failure would accelerate deindustrialization, undermining climate goals through carbon leakage while eroding strategic autonomy. The stakes extend far beyond steel itself to fundamental questions about industrial policy, energy transition, and Europe's economic future in an increasingly competitive and geopolitically tense world.

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