

## AB’NİN SINIRDA KARBON DÜZENLEME MEKANİZMASINA İLİŞKİN ETKİ ANALİZİ ÇERÇEVESİNDE AB KOMİSYONUNA İLETİLEN ÜLKE GÖRÜŞÜMÜZ HAKKINDA BİLGİ NOTU

İncelenmesinden, ülke görüşümüzün, AB’nin ülkemizle arasındaki Gümrük Birliği (GB) ile AKÇT STA’sından doğan ikili yükümlülükleri ile Dünya Ticaret Örgütü (DTÖ) ve Birleşmiş Milletler İklim Değişikliği Çerçeve Sözleşmesi (BMİDÇS) kapsamındaki uluslararası yükümlülükleri ile düzenlemenin metodolojisine ve finansmana ilişkin hususlar olmak üzere üç temel üzerine kurgulandığı görülecektir.

Söz konusu düzenlemenin, başta AB’nin ülkemiz ile arasındaki ikili ve uluslararası anlaşmalar kapsamındaki yükümlülükleri çerçevesinde, Gümrük Birliği (GB) ve AKÇT STA’sı hükümleri olmak üzere DTÖ kuralları ile Birleşmiş Milletler İklim Değişikliği Çerçeve Sözleşmesi (BMİDÇS)’nin “ortak fakat farklılaştırılmış sorumluluklar ve göreceli kabiliyetler” ilkesine uyumluluğu konusundaki endişelerimiz ve gerekli danışmaların yürütülmesi ihtiyacı belirtilmiştir. Bu kapsamda, GB Kararının ithalatta yeni bir gümrük vergisi uygulanamayacağına ve taraflar arasındaki ticarete keyfi bir ayrımcılığa veya örtülü bir kısıtlamaya yol açacak miktar kısıtlamalarının yasak olduğuna ilişkin ilgili maddelerine vurgu yapılmıştır. Benzer şekilde, Türkiye ve AB arasındaki AKÇT STA’sı ile Türkiye-AB tarım ürünleri ticaretine ilişkin 1/98 sayılı OKK’nın ilgili hükümleri çerçevesinde taraflar arasındaki ticarete yeni gümrük vergilerinin, miktar kısıtlamalarının ve eş etkili tedbirlerin tesis edilmesinin kural olarak yasaklanmış olduğu ve sınırda karbon vergisi düzenlemesinin, AB’nin ülkemize karşı ikili yükümlülüklerinin kaynağını oluşturan bu kurallar çerçevesinde ele alınması gerektiği belirtilmiştir.

Diğer taraftan, BMİDÇS ve bu doğrultuda Paris Anlaşması’nın ilgili maddesi uyarınca “ortak fakat farklılaştırılmış sorumluluklar ve göreceli kabiliyetler” ilkesi çerçevesinde ülkelerin iklim değişikliği ile mücadelede farklı kapasite ve sorumluluklarının dikkate alınması gerektiği ve sınırda karbon vergisi düzenlemesinin de bu ilkeyi gözetmesi gerektiğinin altı çizilmiştir. Ayrıca, yine BMİDÇS’nin ilgili maddeleri gereğince iklim değişikliği ile mücadelede alınan önlemlerin uluslararası ticarete haksız bir ayrımcılığa veya örtülü bir kısıtlamaya yol açmaması gerektiği ve söz konusu düzenlemenin başta ülkemiz olmak üzere diğer ihracatçı ülkeler üzerindeki negatif etkilerinin dikkate alınması gerektiğinin altı çizilmiştir. Önlemin ne şekilde dizayn edileceğine ve içeriğine ilişkin detaylar henüz netleşmemiş olmakla birlikte, önlemin DTÖ kurallarına uygunluğuna ilişkin endişelerimiz ifade edilmiştir.

Metodolojiye ilişkin hususlar çerçevesinde, her ne kadar görüşümüz önlemin uygulanmamasından yana olsa da, uygulanması halinde ülkelerin farklı kapasiteleri ile emisyonları azaltmaya yönelik farklı politika, vergi ve yenilenebilir enerji yatırımları gibi farklı düzenlemelerinin de dikkate alınması; daha iyi durumdaki ihracatçıya bunu ortaya koyması halinde muafiyet imkânı tanınması; ancak belgelendirme gereklerinin maliyetli ve karmaşık olmaması gerekliliği hususlarına işaret edilmiştir. Söz konusu düzenlemeye ilişkin metodolojinin özellikle Gelişme Yolundaki Ülkelerin farklı ekonomik gelişmişlik seviyeleri ile özel koşullarını dikkate alan adil, şeffaf ve öngörülebilir bir temel üzerine oturtulması gerektiği vurgulanmıştır.

Finansmana ilişkin olarak, aynı finansman imkânlarına sahip olmadan ülkemizin bu tür bir önleme tabi tutulmasının rekabet koşullarına ciddi şekilde zarar vereceği; ülkemizin AB'nin bu bağlamda yarattığı tüm finansman mekanizmalarına erişiminin sağlanması; AB'nin bu yoldan elde edeceği gelirlerin AB'de değil ilgili ülkelerdeki yeşil yatırımlar için tahsisi hususlarının altı çizilmiştir.



T.C.  
**TİCARET BAKANLIĞI**  
**Uluslararası Anlaşmalar ve Avrupa Birliği Genel Müdürlüğü**

Sayı : 79668890-740  
Konu : AB Sınırdaki Karbon Düzenleme  
Mekanizması Kamu İstişare Süreci

**DAĞITIM YERLERİNE**

Bilindiği üzere, Avrupa Birliği (AB), Avrupa Yeşil Mutabakatı (AYM)'nin önemli politika araçlarından biri olarak addolunan sınırda karbon düzenleme mekanizması'nın içeriğinin belirlenmesi ve bundan etkilenebilecek tüm paydaşlarla birlikte etkilerinin ele alınabilmesi adına 4 Mart 2020- 1 Nisan 2020 tarihleri arasında bir "geri bildirim süreci" yürütmüştür.

Bu çerçevede, ilgili özel sektör temsilcilerimiz ile kamu kurumlarımız tarafından Bakanlığımıza intikal ettirilen görüşler de dikkate alınarak ülke görüşümüz hazırlanmış ve Avrupa Komisyonuna iletilmiş bulunmaktadır. İstifadeleri için ülke görüşümüzde yer verilen önemli hususlara ilişkin özet bilgi notu ekte iletilmektedir.

Avrupa Komisyonu tarafından sınırda karbon düzenleme mekanizmasının hayata geçirilmesine ilişkin yürütülen çalışmalar kapsamında, bu defa, başlatılan kamu istişare süreci çerçevesinde ekte iletilen anketin 28 Ekim 2020 tarihine kadar paydaşlar tarafından doldurulması beklenmektedir.

Ülkemiz sektörlerinin de hem kendileri hem de AB'de yakın işbirliği içinde oldukları sektör/kullanıcı sektör kuruluşları aracılığıyla sınırda karbon düzenleme mekanizmasının dizaynına ilişkin bu süreçlere görüşlerini mümkün olduğu ölçüde yansıtılmalarının önem arz ettiği düşünülmektedir. Bu çerçevede, anketi cevaplamak isteyen kuruluşlarımızın, ankete <https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/12228-Carbon-Border-Adjustment-Mechanism/public-consultation> linki üzerinden erişimleri mümkündür.

Ayrıca, söz konusu anket soruları kapsamında, ülke görüşümüzde yer alan hususlara ilave olarak varsa Komisyona iletilmesinde fayda görülen hususların da Bakanlığımız ile paylaşılması halinde, Avrupa Komisyonu nezdinde dikkate getirilmek üzere iletilmesi de mümkün olacaktır.

Bilgilerini ve söz konusu anket kapsamında varsa Bakanlığımıza iletilmesinde fayda görülen hususların en geç 1 Ekim 2020 tarihine kadar [abtekpazar@ticaret.gov.tr](mailto:abtekpazar@ticaret.gov.tr) adresine iletilmesi hususunda gereğini rica ederim.



e-imzalıdır  
Hüsnü DİLEMRE  
Bakan a.  
Genel Müdür V.

Ek:

1- CBAM\_10\_08\_2020\_EN

2- SKD Ülke Görüşü Not

**Dağıtım:**

Türkiye Odalar ve Borsalar Birliği Başkanlığına  
Türkiye İhracatçılar Meclisi Başkanlığına  
Deik Dış Ekonomik İlişkiler Kurulu Başkanlığına  
Türk Sanayicileri ve İş İnsanları Derneğine  
Müstakil Sanayici ve İşadamları Derneğine  
Türkiye Esnaf ve Sanatkarları Konfederasyonuna  
Türk Girişim ve İş Dünyası Konfederasyonuna  
Türkiye Müteahhitler Birliğine  
Yased Uluslararası Yatırımcılar Derneğine  
Osd Otomotiv Sanayii Derneğine  
İktisadi Kalkınma Vakfına  
Türkiye Ekonomi Politikaları Araştırma Vakfına  
Avrupa Birliği ve Küresel Araştırmalar Derneğine

28.9.2020 / 33573

# Public Consultation on the Carbon Border Adjustment

Fields marked with \* are mandatory.

## Introduction

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The [European Green Deal](#) adopted by the Commission on 11 December 2019 aims to transform the EU into a fair and prosperous society, with a modern, resource-efficient and competitive economy where there are no net emissions of greenhouse gases in 2050 and where economic growth is decoupled from resource use. The long-term objective of climate neutrality by 2050 will be enshrined in legislation and the Commission will propose to increase the EU's climate ambition to reduce greenhouse gases emissions by 50-55% from 1990 levels by 2030.

In this context, the European Green Deal emphasized that "should differences in levels of ambition worldwide persist, as the EU increases its climate ambition, the Commission will propose a carbon border adjustment mechanism, for selected sectors, to reduce the risk of carbon leakage". Risk of carbon leakage means either that production is transferred from the EU to other countries with lower ambition for emission reduction, or that EU products are replaced by more carbon-intensive imports. If this risk materialises, there will be no reduction in global emissions, and this will frustrate the efforts of the EU and its industries to meet the global climate objectives of the Paris Agreement.

A Carbon Border Adjustment Mechanism (CBAM) would ensure that the price of imports reflects more accurately their carbon content. This measure will be designed to comply with World Trade Organization rules and other international obligations of the EU. This measure would be an alternative to the current free allocation of allowances or compensation for the increase in electricity costs that address the risk of carbon leakage, because of carbon pricing in the EU's [Emissions Trading System](#) (ETS). Since 2005, the EU Emissions Trading System has been a key tool for reducing greenhouse gas emissions in the industrial and power sectors, by setting up a carbon market based on a 'cap and trade' principle. The system works by putting a limit on overall emissions from covered installations, which is reduced each year. Within this limit, companies can buy and sell emission allowances as needed, while some allowances are provided for free to certain industries on the basis of harmonised rules.

On 27 May 2020, the European Commission set out a [Recovery Plan for Europe](#) in response to the economic and social impacts of the COVID-19 pandemic. In the context of this plan, a new recovery instrument has been put forward by the Commission, with the proposal that the necessary funds be raised by temporarily lifting the EU's own resources ceiling. In this context, green own resources could contribute to future financing of the EU budget while supporting the green transition of the European economy and society. The Carbon Border Adjustment Mechanism is one of the possible options mentioned in the Recovery Plan for Europe in this context.

## About you

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## Language of my contribution

- Bulgarian
- Croatian
- Czech
- Danish
- Dutch
- English
- Estonian
- Finnish
- French
- Gaelic
- German
- Greek
- Hungarian
- Italian
- Latvian
- Lithuanian
- Maltese
- Polish
- Portuguese
- Romanian
- Slovak
- Slovenian
- Spanish
- Swedish

## \* I am giving my contribution as

- Academic/research institution
- Business association
- Company/business organisation
- Consumer organisation
- EU citizen
- Environmental organisation
- Non-EU citizen
- Non-governmental organisation (NGO)

- Public authority
- Trade union
- Other

\* First name

\* Surname

\* Email (this won't be published)

\* Scope

- International
- Local
- National
- Regional

\* Organisation name

*255 character(s) maximum*

\* Organisation size

- Micro (1 to 9 employees)
- Small (10 to 49 employees)
- Medium (50 to 249 employees)
- Large (250 or more)

Transparency register number

*255 character(s) maximum*

Check if your organisation is on the [transparency register](#). It's a voluntary database for organisations seeking to influence EU decision-making.

\* Country of origin

Please add your country of origin, or that of your organisation.

- Afghanistan
- Åland Islands
- Albania
- Algeria
- American Samoa
- Andorra
- Angola
- Anguilla
- Antarctica
- Antigua and Barbuda
- Argentina
- Armenia
- Aruba
- Australia
- Austria
- Azerbaijan
- Bahamas
- Bahrain
- Bangladesh
- Barbados
- Belarus
- Belgium
- Djibouti
- Dominica
- Dominican Republic
- Ecuador
- Egypt
- El Salvador
- Equatorial Guinea
- Eritrea
- Estonia
- Eswatini
- Ethiopia
- Falkland Islands
- Faroe Islands
- Fiji
- Finland
- France
- French Guiana
- French Polynesia
- French Southern and Antarctic Lands
- Gabon
- Georgia
- Germany
- Libya
- Liechtenstein
- Lithuania
- Luxembourg
- Macau
- Madagascar
- Malawi
- Malaysia
- Maldives
- Mali
- Malta
- Marshall Islands
- Martinique
- Mauritania
- Mauritius
- Mayotte
- Mexico
- Micronesia
- Moldova
- Monaco
- Mongolia
- Montenegro
- Saint Martin
- Saint Pierre and Miquelon
- Saint Vincent and the Grenadines
- Samoa
- San Marino
- São Tomé and Príncipe
- Saudi Arabia
- Senegal
- Serbia
- Seychelles
- Sierra Leone
- Singapore
- Sint Maarten
- Slovakia
- Slovenia
- Solomon Islands
- Somalia
- South Africa
- South Georgia and the South Sandwich Islands
- South Korea
- South Sudan
- Spain

- Belize
- Benin
- Bermuda
- Bhutan
- Bolivia
- Bonaire Saint Eustatius and Saba
- Bosnia and Herzegovina
- Botswana
- Bouvet Island
- Brazil
- British Indian Ocean Territory
- British Virgin Islands
- Brunei
- Bulgaria
- Burkina Faso
- Burundi
- Cambodia
- Cameroon
- Canada
- Cape Verde
- Cayman Islands
- Central African Republic
- Ghana
- Gibraltar
- Greece
- Greenland
- Grenada
- Guadeloupe
- Guam
- Guatemala
- Guernsey
- Guinea
- Guinea-Bissau
- Guyana
- Haiti
- Heard Island and McDonald Islands
- Honduras
- Hong Kong
- Hungary
- Iceland
- India
- Indonesia
- Iran
- Iraq
- Montserrat
- Morocco
- Mozambique
- Myanmar /Burma
- Namibia
- Nauru
- Nepal
- Netherlands
- New Caledonia
- New Zealand
- Nicaragua
- Niger
- Nigeria
- Niue
- Norfolk Island
- Northern Mariana Islands
- North Korea
- North Macedonia
- Norway
- Oman
- Pakistan
- Palau
- Sri Lanka
- Sudan
- Suriname
- Svalbard and Jan Mayen
- Sweden
- Switzerland
- Syria
- Taiwan
- Tajikistan
- Tanzania
- Thailand
- The Gambia
- Timor-Leste
- Togo
- Tokelau
- Tonga
- Trinidad and Tobago
- Tunisia
- Turkey
- Turkmenistan
- Turks and Caicos Islands
- Tuvalu



- Chad
- Chile
- China
- Christmas Island
- Clipperton
- Cocos (Keeling) Islands
- Colombia
- Comoros
- Congo
- Cook Islands
- Costa Rica
- Côte d'Ivoire
- Croatia
- Cuba
- Curaçao
- Cyprus
- Czechia
- Democratic Republic of the Congo
- Denmark
- Ireland
- Isle of Man
- Israel
- Italy
- Jamaica
- Japan
- Jersey
- Jordan
- Kazakhstan
- Kenya
- Kiribati
- Kosovo
- Kuwait
- Kyrgyzstan
- Laos
- Latvia
- Lebanon
- Lesotho
- Liberia
- Palestine
- Panama
- Papua New Guinea
- Paraguay
- Peru
- Philippines
- Pitcairn Islands
- Poland
- Portugal
- Puerto Rico
- Qatar
- Réunion
- Romania
- Russia
- Rwanda
- Saint Barthélemy
- Saint Helena Ascension and Tristan da Cunha
- Saint Kitts and Nevis
- Saint Lucia
- Uganda
- Ukraine
- United Arab Emirates
- United Kingdom
- United States
- United States Minor Outlying Islands
- Uruguay
- US Virgin Islands
- Uzbekistan
- Vanuatu
- Vatican City
- Venezuela
- Vietnam
- Wallis and Futuna
- Western Sahara
- Yemen
- Zambia
- Zimbabwe

#### \* Publication privacy settings

The Commission will publish the responses to this public consultation. You can choose whether you would like your details to be made public or to remain anonymous.

**Anonymous**

Only your type of respondent, country of origin and contribution will be published. All other personal details (name, organisation name and size, transparency register number) will not be published.

**Public**

Your personal details (name, organisation name and size, transparency register number, country of origin) will be published with your contribution.

I agree with the [personal data protection provisions](#)

## Questions to all stakeholders

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### General context

The European Union is at the forefront of the fight against climate change and has set ambitious energy and climate policies. The European Green Deal adopted by the Commission on 11 December 2019 sets out the policies to achieve climate neutrality by 2050. Delivering on the Green Deal will require action by all actors and all sectors of our economy.

1. To what extent are you familiar with the following initiatives and legislation at EU and international level?

	i. Very familiar	ii. Moderately familiar	iii. Slightly familiar	iv. Not familiar at all
* a. The <a href="#">EU Green Deal</a>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* b. The <a href="#">European Climate Policy</a>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* c. The <a href="#">Paris Agreement on climate change</a>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* d. The <a href="#">UN Sustainable Development Goals</a>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* e. The <a href="#">EU Emissions Trading System</a> (ETS)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* f. The <a href="#">EU Energy Union</a>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* g. The <a href="#">New Industrial Strategy for Europe</a>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* h. The proposed, by the European Commission, <a href="#">Recovery Plan for Europe</a> and the new recovery instrument <a href="#">Next Generation EU</a>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* i. The <a href="#">World Trade Organisation</a> rules and EU's <a href="#">trade agreements</a>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

2. Please rate your level of agreement with the following general statements

	i. Strongly agree	ii Somewhat agree	iii. Somewhat disagree	iv. Strongly disagree
a. Putting in place an EU Carbon Border Adjustment Mechanism is justified if differences of ambition between the EU and third countries in fighting climate change persist.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
b. By reducing risks of carbon leakage, a Carbon Border Adjustment Mechanism can help achieving the EU objective of climate neutrality by 2050 and contribute to global climate efforts.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
c. A higher price on some imported products due to the introduction of a Carbon Border Adjustment Mechanism in the EU would be acceptable if it contributed to global climate efforts	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
d. A Carbon Border Adjustment Mechanism would impose unnecessary burden on EU industry	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

## Justification and objectives

The efforts of the EU to fight global climate change by increasing its climate ambition by 2030 and become climate-neutral by 2050 could be undermined by a lack of ambition by our international partners. This would mean a risk of carbon leakage via the transfer of production and thus emissions from the EU to countries that have less strict climate policies in place, or via replacing EU products by more carbon-intensive imports. In such case global emissions would not be reduced. A Carbon Border Adjustment Mechanism could counteract this risk by ensuring equivalent costs of carbon between imports and goods produced in the EU.

### 3. Questions on the risk of carbon leakage

#### 3.1 In view of EU's enhanced climate ambition the risk of carbon leakage is likely to:

- i. Increase
- ii. Remain unchanged
- iii. Decrease

#### 3.2 To what extent do you agree with the following statements?

	i. Strongly agree	ii. Somewhat agree	iii. Somewhat disagree	iv. Strongly disagree
a. Carbon leakage is already a reality	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

b. Current measures to address the risk of carbon leakage under the EU Emissions Trading System and State Aid Rules, such as free allocation of allowances and indirect cost compensation are effective in limiting the current risk of carbon leakage	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
c. Current measures to address the risk of carbon leakage under the EU Emissions Trading System are sufficient in limiting the risk of carbon leakage even in view of the EU's enhanced climate ambition	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
d. A Carbon Border Adjustment Mechanism could be effective in addressing the risk of carbon leakage	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
e. A Carbon Border Adjustment Mechanism can be effective in encouraging the deployment of less carbon intensive technologies and ambitious climate policies in partner countries	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
f. A Carbon Border Adjustment Mechanism can lead to a change in consumption patterns in the EU, by making available the choice of less carbon intensive products	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
g. Reducing greenhouse gas emissions can be better achieved through regulatory means such as performance standards for products placed on the EU market	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

4. The objective of the Carbon Border Adjustment Mechanism is to address the risk of carbon leakage from the EU to other countries. Please rate to what extent do you agree that the following should be also part of the objectives of the Carbon Border Adjustment Mechanism

[0 – Not important /.../ 5 – Very important]

	0	1	2	3	4	5
a. Enable policies that aim at reducing carbon emissions in the EU	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
b. Fostering the reduction of greenhouse gas emissions at global level	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
c. Ensure a carbon - level playing field for producers in terms of the impact of carbon-driven costs	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

5. Which of the following EU policy areas are the most important to take into account in the design of the Carbon Border Adjustment Mechanism [0 – Not important /.../ 5 – Very important]:

	0	1	2	3	4	5
a. Climate, notably the EU Emissions Trading System	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
b. Trade	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
c. Energy taxation	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
d. Development aid	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
e. Industry	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
f. Research and innovation	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
g. Circular economy	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

## Questions targeted at expert stakeholders

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### The Carbon Border Adjustment Mechanism in detail

A Carbon Border Adjustment Mechanism, for selected sectors, could contribute to reducing the risk of carbon leakage. The initiative would be linked to the pricing of carbon inside the EU, which is regulated for some sectors through the EU Emissions Trading System. The mechanism would aim at ensuring equivalent carbon costs between imports and goods produced in the EU. The possibility to adjust the price of exports also needs to be explored. However, some of the options described below may go beyond a strict border measure and apply to EU production, as well as to imports. As part of the work on the impact assessment, the Commission will develop a number of policy options that will address the type of policy instrument to be employed, the methodological approach and its sectoral scope. Any option to be envisaged will take into consideration the other initiatives foreseen in the context of the EU Green Deal, current EU legislation such as the EU ETS and the EU's international obligations.

### Design and coverage of the mechanism

6. Which of the options (6.1-6.4) do you consider as appropriate for the design of a Carbon Border Adjustment Mechanism as described above? Please also indicate your view about the effectiveness and impact of each option:

6.1 A tax applied on imports at the EU border on a selection of products whose production is in sectors that are at risk of carbon leakage. This could be a border tax or customs duty on selected carbon intensive products. This option would be:

- i. Highly relevant
- ii. Somewhat relevant
- iii. Not relevant

6.1.1. The option described in 6.1 will:

	i. Strongly agree	ii. Somewhat agree	iii. Neither agree or disagree	iv. Somewhat disagree	v. Strongly disagree
a. Be effective in addressing the risk of carbon leakage	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
b. Impose little administrative burden on EU importers	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
c. Impose little administrative burden on exporters from partner countries	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
d. Be difficult to circumvent	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

6.1.2 The option described in 6.1 will have an impact on my activity. This impact will be:

- i. Positive
- ii. Negative

6.2 An extension of the EU Emissions Trading System to imports, which could require the purchasing of emission allowances under the EU Emissions Trading System by either foreign producers or importers. This option would be:

- i. Highly relevant
- ii. Somewhat relevant
- iii. Not relevant

6.2.1. The option described in 6.2 will:

	i. Strongly agree	ii. Somewhat agree	iii. Neither agree or disagree	iv. Somewhat disagree	v. Strongly disagree
a. Be effective in addressing the risk of carbon leakage	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
b. Impose little administrative burden on EU importers	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
c. Impose little administrative burden on exporters from partner countries	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
d. Be difficult to circumvent	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

e. Have a limited impact on the operations of EU producers subject to the EU Emissions Trading System	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
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6.2.2 The option described in 6.2 will have an impact on my activity. This impact will be:

- i. Positive
- ii. Negative

6.3 The obligation to purchase allowances from a specific pool outside the ETS dedicated to imports, which would mirror the ETS price. This option would be:

- i. Highly relevant
- ii. Somewhat relevant
- iii. Not relevant

6.3.1. The option described in 6.3 will:

	i. Strongly agree	ii. Somewhat agree	iii. Neither agree or disagree	iv. Somewhat disagree	v. Strongly disagree
a. Be effective in addressing the risk of carbon leakage	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
b. Impose little administrative burden on EU importers	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
c. Impose little administrative burden on exporters from partner countries	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
d. Be difficult to circumvent	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
e. Have a limited impact on the operations of EU producers participating in the EU Emission Trading System	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

6.3.2 The option described in 6.3 will have an impact on my activity. This impact will be:

- i. Positive
- ii. Negative

6.4 Carbon tax (e.g. excise or VAT type) at consumption level on a selection of products whose production is in sectors that are at risk of carbon leakage. Under this option, the tax would apply to EU production, as well as to imports. This option would be:

- i. Highly relevant
- ii. Somewhat relevant
- iii. Not relevant

6.4.1 The option described in 6.4 will:

	i. Strongly agree	ii. Somewhat agree	iii. Neither agree or disagree	iv. Somewhat disagree	v. Strongly disagree
a. Be effective in addressing the risk of carbon leakage	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
b. Impose little administrative burden on European importers	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
c. Impose little administrative burden on exporters from partner countries	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
d. Impose little administrative burden on EU producers	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
e. Be effective in addressing all the carbon emissions of the sectors to which it is applied	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
f. Be difficult to circumvent	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

6.4.2 The option described in 6.4 will have an impact on my activity. This impact will be:

- i. Positive
- ii. Negative

6.5 Please specify other types of policy instruments not covered by the above

*1000 character(s) maximum*

7. Please rate the proposals in the list below with regard to their relevance for the coverage of the Carbon Border Adjustment Mechanism

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	i. Strongly agree	ii. Somewhat agree	iii. Neither agree or disagree	iv. Somewhat disagree	v. Strongly disagree
a. The Carbon Border Adjustment Mechanism should cover not only direct emissions but also include indirect emissions that occurred in the production of the electricity used to produce the product	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
b. Carbon Border Adjustment Mechanism should cover the emissions of the complete value chain, not only the emissions of the last stage of production before import into the EU	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
c. The Carbon Border Adjustment Mechanism should differentiate in the treatment of imports of finished products, intermediate products and primary inputs	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
d. Emissions from international transport of the goods covered should be taken into account by the Carbon Border Adjustment Mechanism	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

8. The Commission indicated in its Green Deal communication that the Carbon Border Adjustment Mechanism would be proposed for selected sectors

8.1 Please indicate if you agree that the following could be relevant in determining the coverage of the Carbon Border Adjustment Mechanism

	i. Strongly agree	ii. Somewhat agree	iii. Somewhat disagree	iv. Strongly disagree
a. Should focus on products from activities covered by the EU Emissions Trading System	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
b. Should focus on products from activities covered by the EU Emissions Trading System with highest risk of carbon leakage	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
c. Should not focus only on a product but address the relevant parts of value chains related to the product	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

## 8.2 Other important elements in the selection of sectors. Please specify:

450 character(s) maximum

9. Considering the criteria outlined in the previous question, please indicate which according to your view could be the priority sectors that the Carbon Border Adjustment Mechanism should focus on. Please choose sectors in the drop down menu that includes all the economic activities in Level 3 NACE (rev. 2) excluding services. Should more detailed specification be required, or if you would like to select sectors not covered in the drop down menu, this can be provided in sectors 7-10 below at Level 4 NACE (rev. 2).

### Sector 1. Please select from list (Level 3 NACE rev.2 excluding services)

- A011 Growing of non-perennial crops
- A012 Growing of perennial crops
- A013 Plant propagation
- A014 Animal production
- A015 Mixed farming
- A016 Support activities to agriculture and post-harvest crop activities
- A017 Hunting, trapping and related service activities
- A021 Silviculture and other forestry activities
- A022 Logging
- A023 Gathering of wild growing non-wood products
- A024 Support services to forestry
- A031 Fishing
- A032 Aquaculture
- B051 Mining of hard coal
- B052 Mining of lignite
- B061 Extraction of crude petroleum
- B062 Extraction of natural gas
- B071 Mining of iron ores
- B072 Mining of non-ferrous metal ores
- B081 Quarrying of stone, sand and clay
- B089 Mining and quarrying n.e.c.
- B091 Support activities for petroleum and natural gas extraction
- B099 Support activities for other mining and quarrying
- C101 Processing and preserving of meat and production of meat products
- C102 Processing and preserving of fish, crustaceans and molluscs
-

- C103 Processing and preserving of fruit and vegetables
- C104 Manufacture of vegetable and animal oils and fats
- C105 Manufacture of dairy products
- C106 Manufacture of grain mill products, starches and starch products
- C107 Manufacture of bakery and farinaceous products
- C108 Manufacture of other food products
- C109 Manufacture of prepared animal feeds
- C110 Manufacture of beverages
- C120 Manufacture of tobacco products
- C131 Preparation and spinning of textile fibres
- C132 Weaving of textiles
- C133 Finishing of textiles
- C139 Manufacture of other textiles
- C141 Manufacture of wearing apparel, except fur apparel
- C142 Manufacture of articles of fur
- C143 Manufacture of knitted and crocheted apparel
- C151 Tanning and dressing of leather; manufacture of luggage, handbags, saddlery and harness; dressing and dyeing of fur
- C152 Manufacture of footwear
- C161 Sawmilling and planing of wood
- C162 Manufacture of products of wood, cork, straw and plaiting materials
- C171 Manufacture of pulp, paper and paperboard
- C172 Manufacture of articles of paper and paperboard
- C181 Printing and service activities related to printing
- C182 Reproduction of recorded media
- C191 Manufacture of coke oven products
- C192 Manufacture of refined petroleum products
- C201 Manufacture of basic chemicals, fertilisers and nitrogen compounds, plastics and synthetic rubber in primary forms
- C202 Manufacture of pesticides and other agrochemical products
- C203 Manufacture of paints, varnishes and similar coatings, printing ink and mastics
- C204 Manufacture of soap and detergents, cleaning and polishing preparations, perfumes and toilet preparations
- C205 Manufacture of other chemical products

- C206 Manufacture of man-made fibres
- C211 Manufacture of basic pharmaceutical products
- C212 Manufacture of pharmaceutical preparations
- C221 Manufacture of rubber products
- C222 Manufacture of plastics products
- C231 Manufacture of glass and glass products
- C232 Manufacture of refractory products
- C233 Manufacture of clay building materials
- C234 Manufacture of other porcelain and ceramic products
- C235 Manufacture of cement, lime and plaster
- C236 Manufacture of articles of concrete, cement and plaster
- C237 Cutting, shaping and finishing of stone
- C239 Manufacture of abrasive products and non-metallic mineral products n. e.c.
- C241 Manufacture of basic iron and steel and of ferro-alloys
- C242 Manufacture of tubes, pipes, hollow profiles and related fittings, of steel
- C243 Manufacture of other products of first processing of steel
- C244 Manufacture of basic precious and other non-ferrous metals
- C245 Casting of metals
- C251 Manufacture of structural metal products
- C252 Manufacture of tanks, reservoirs and containers of metal
- C253 Manufacture of steam generators, except central heating hot water boilers
- C254 Manufacture of weapons and ammunition
- C255 Forging, pressing, stamping and roll-forming of metal; powder metallurgy
- C256 Treatment and coating of metals; machining
- C257 Manufacture of cutlery, tools and general hardware
- C259 Manufacture of other fabricated metal products
- C261 Manufacture of electronic components and boards
- C262 Manufacture of computers and peripheral equipment
- C263 Manufacture of communication equipment
- C264 Manufacture of consumer electronics
- C265 Manufacture of instruments and appliances for measuring, testing and navigation; watches and clocks

- C266 Manufacture of irradiation, electromedical and electrotherapeutic equipment
- C267 Manufacture of optical instruments and photographic equipment
- C268 Manufacture of magnetic and optical media
- C271 Manufacture of electric motors, generators, transformers and electricity distribution and control apparatus
- C272 Manufacture of batteries and accumulators
- C273 Manufacture of wiring and wiring devices
- C274 Manufacture of electric lighting equipment
- C275 Manufacture of domestic appliances
- C279 Manufacture of other electrical equipment
- C281 Manufacture of general-purpose machinery
- C282 Manufacture of other general-purpose machinery
- C283 Manufacture of agricultural and forestry machinery
- C284 Manufacture of metal forming machinery and machine tools
- C289 Manufacture of other special-purpose machinery
- C291 Manufacture of motor vehicles
- C292 Manufacture of bodies (coachwork) for motor vehicles; manufacture of trailers and semi-trailers
- C293 Manufacture of parts and accessories for motor vehicles
- C301 Building of ships and boats
- C302 Manufacture of railway locomotives and rolling stock
- C303 Manufacture of air and spacecraft and related machinery
- C304 Manufacture of military fighting vehicles
- C309 Manufacture of transport equipment n.e.c.
- C310 Manufacture of furniture
- C321 Manufacture of jewellery, bijouterie and related articles
- C322 Manufacture of musical instruments
- C323 Manufacture of sports goods
- C324 Manufacture of games and toys
- C325 Manufacture of medical and dental instruments and supplies
- C329 Manufacturing n.e.c.
- C331 Repair of fabricated metal products, machinery and equipment
- C332 Installation of industrial machinery and equipment
- D351 Electric power generation, transmission and distribution

- D352 Manufacture of gas; distribution of gaseous fuels through mains
- D353 Steam and air conditioning supply
- E360 Water collection, treatment and supply
- E370 Sewerage
- E381 Waste collection
- E382 Waste treatment and disposal
- E383 Materials recovery
- E390 Remediation activities and other waste management services

Sector 2. Please select from list (Level 3 NACE rev.2 excluding services)

- A011 Growing of non-perennial crops
- A012 Growing of perennial crops
- A013 Plant propagation
- A014 Animal production
- A015 Mixed farming
- A016 Support activities to agriculture and post-harvest crop activities
- A017 Hunting, trapping and related service activities
- A021 Silviculture and other forestry activities
- A022 Logging
- A023 Gathering of wild growing non-wood products
- A024 Support services to forestry
- A031 Fishing
- A032 Aquaculture
- B051 Mining of hard coal
- B052 Mining of lignite
- B061 Extraction of crude petroleum
- B062 Extraction of natural gas
- B071 Mining of iron ores
- B072 Mining of non-ferrous metal ores
- B081 Quarrying of stone, sand and clay
- B089 Mining and quarrying n.e.c.
- B091 Support activities for petroleum and natural gas extraction
- B099 Support activities for other mining and quarrying
- C101 Processing and preserving of meat and production of meat products
- C102 Processing and preserving of fish, crustaceans and molluscs

- C103 Processing and preserving of fruit and vegetables
- C104 Manufacture of vegetable and animal oils and fats
- C105 Manufacture of dairy products
- C106 Manufacture of grain mill products, starches and starch products
- C107 Manufacture of bakery and farinaceous products
- C108 Manufacture of other food products
- C109 Manufacture of prepared animal feeds
- C110 Manufacture of beverages
- C120 Manufacture of tobacco products
- C131 Preparation and spinning of textile fibres
- C132 Weaving of textiles
- C133 Finishing of textiles
- C139 Manufacture of other textiles
- C141 Manufacture of wearing apparel, except fur apparel
- C142 Manufacture of articles of fur
- C143 Manufacture of knitted and crocheted apparel
- C151 Tanning and dressing of leather; manufacture of luggage, handbags, saddlery and harness; dressing and dyeing of fur
- C152 Manufacture of footwear
- C161 Sawmilling and planing of wood
- C162 Manufacture of products of wood, cork, straw and plaiting materials
- C171 Manufacture of pulp, paper and paperboard
- C172 Manufacture of articles of paper and paperboard
- C181 Printing and service activities related to printing
- C182 Reproduction of recorded media
- C191 Manufacture of coke oven products
- C192 Manufacture of refined petroleum products
- C201 Manufacture of basic chemicals, fertilisers and nitrogen compounds, plastics and synthetic rubber in primary forms
- C202 Manufacture of pesticides and other agrochemical products
- C203 Manufacture of paints, varnishes and similar coatings, printing ink and mastics
- C204 Manufacture of soap and detergents, cleaning and polishing preparations, perfumes and toilet preparations
- C205 Manufacture of other chemical products



- C206 Manufacture of man-made fibres
- C211 Manufacture of basic pharmaceutical products
- C212 Manufacture of pharmaceutical preparations
- C221 Manufacture of rubber products
- C222 Manufacture of plastics products
- C231 Manufacture of glass and glass products
- C232 Manufacture of refractory products
- C233 Manufacture of clay building materials
- C234 Manufacture of other porcelain and ceramic products
- C235 Manufacture of cement, lime and plaster
- C236 Manufacture of articles of concrete, cement and plaster
- C237 Cutting, shaping and finishing of stone
- C239 Manufacture of abrasive products and non-metallic mineral products n. e.c.
- C241 Manufacture of basic iron and steel and of ferro-alloys
- C242 Manufacture of tubes, pipes, hollow profiles and related fittings, of steel
- C243 Manufacture of other products of first processing of steel
- C244 Manufacture of basic precious and other non-ferrous metals
- C245 Casting of metals
- C251 Manufacture of structural metal products
- C252 Manufacture of tanks, reservoirs and containers of metal
- C253 Manufacture of steam generators, except central heating hot water boilers
- C254 Manufacture of weapons and ammunition
- C255 Forging, pressing, stamping and roll-forming of metal; powder metallurgy
- C256 Treatment and coating of metals; machining
- C257 Manufacture of cutlery, tools and general hardware
- C259 Manufacture of other fabricated metal products
- C261 Manufacture of electronic components and boards
- C262 Manufacture of computers and peripheral equipment
- C263 Manufacture of communication equipment
- C264 Manufacture of consumer electronics
- C265 Manufacture of instruments and appliances for measuring, testing and navigation; watches and clocks



- C266 Manufacture of irradiation, electromedical and electrotherapeutic equipment
- C267 Manufacture of optical instruments and photographic equipment
- C268 Manufacture of magnetic and optical media
- C271 Manufacture of electric motors, generators, transformers and electricity distribution and control apparatus
- C272 Manufacture of batteries and accumulators
- C273 Manufacture of wiring and wiring devices
- C274 Manufacture of electric lighting equipment
- C275 Manufacture of domestic appliances
- C279 Manufacture of other electrical equipment
- C281 Manufacture of general-purpose machinery
- C282 Manufacture of other general-purpose machinery
- C283 Manufacture of agricultural and forestry machinery
- C284 Manufacture of metal forming machinery and machine tools
- C289 Manufacture of other special-purpose machinery
- C291 Manufacture of motor vehicles
- C292 Manufacture of bodies (coachwork) for motor vehicles; manufacture of trailers and semi-trailers
- C293 Manufacture of parts and accessories for motor vehicles
- C301 Building of ships and boats
- C302 Manufacture of railway locomotives and rolling stock
- C303 Manufacture of air and spacecraft and related machinery
- C304 Manufacture of military fighting vehicles
- C309 Manufacture of transport equipment n.e.c.
- C310 Manufacture of furniture
- C321 Manufacture of jewellery, bijouterie and related articles
- C322 Manufacture of musical instruments
- C323 Manufacture of sports goods
- C324 Manufacture of games and toys
- C325 Manufacture of medical and dental instruments and supplies
- C329 Manufacturing n.e.c.
- C331 Repair of fabricated metal products, machinery and equipment
- C332 Installation of industrial machinery and equipment
- D351 Electric power generation, transmission and distribution

- D352 Manufacture of gas; distribution of gaseous fuels through mains
- D353 Steam and air conditioning supply
- E360 Water collection, treatment and supply
- E370 Sewerage
- E381 Waste collection
- E382 Waste treatment and disposal
- E383 Materials recovery
- E390 Remediation activities and other waste management services

Sector 3. Please select from list (Level 3 NACE rev.2 excluding services)

- A011 Growing of non-perennial crops
- A012 Growing of perennial crops
- A013 Plant propagation
- A014 Animal production
- A015 Mixed farming
- A016 Support activities to agriculture and post-harvest crop activities
- A017 Hunting, trapping and related service activities
- A021 Silviculture and other forestry activities
- A022 Logging
- A023 Gathering of wild growing non-wood products
- A024 Support services to forestry
- A031 Fishing
- A032 Aquaculture
- B051 Mining of hard coal
- B052 Mining of lignite
- B061 Extraction of crude petroleum
- B062 Extraction of natural gas
- B071 Mining of iron ores
- B072 Mining of non-ferrous metal ores
- B081 Quarrying of stone, sand and clay
- B089 Mining and quarrying n.e.c.
- B091 Support activities for petroleum and natural gas extraction
- B099 Support activities for other mining and quarrying
- C101 Processing and preserving of meat and production of meat products
- C102 Processing and preserving of fish, crustaceans and molluscs

- C103 Processing and preserving of fruit and vegetables
- C104 Manufacture of vegetable and animal oils and fats
- C105 Manufacture of dairy products
- C106 Manufacture of grain mill products, starches and starch products
- C107 Manufacture of bakery and farinaceous products
- C108 Manufacture of other food products
- C109 Manufacture of prepared animal feeds
- C110 Manufacture of beverages
- C120 Manufacture of tobacco products
- C131 Preparation and spinning of textile fibres
- C132 Weaving of textiles
- C133 Finishing of textiles
- C139 Manufacture of other textiles
- C141 Manufacture of wearing apparel, except fur apparel
- C142 Manufacture of articles of fur
- C143 Manufacture of knitted and crocheted apparel
- C151 Tanning and dressing of leather; manufacture of luggage, handbags, saddlery and harness; dressing and dyeing of fur
- C152 Manufacture of footwear
- C161 Sawmilling and planing of wood
- C162 Manufacture of products of wood, cork, straw and plaiting materials
- C171 Manufacture of pulp, paper and paperboard
- C172 Manufacture of articles of paper and paperboard
- C181 Printing and service activities related to printing
- C182 Reproduction of recorded media
- C191 Manufacture of coke oven products
- C192 Manufacture of refined petroleum products
- C201 Manufacture of basic chemicals, fertilisers and nitrogen compounds, plastics and synthetic rubber in primary forms
- C202 Manufacture of pesticides and other agrochemical products
- C203 Manufacture of paints, varnishes and similar coatings, printing ink and mastics
- C204 Manufacture of soap and detergents, cleaning and polishing preparations, perfumes and toilet preparations
- C205 Manufacture of other chemical products

- C206 Manufacture of man-made fibres
- C211 Manufacture of basic pharmaceutical products
- C212 Manufacture of pharmaceutical preparations
- C221 Manufacture of rubber products
- C222 Manufacture of plastics products
- C231 Manufacture of glass and glass products
- C232 Manufacture of refractory products
- C233 Manufacture of clay building materials
- C234 Manufacture of other porcelain and ceramic products
- C235 Manufacture of cement, lime and plaster
- C236 Manufacture of articles of concrete, cement and plaster
- C237 Cutting, shaping and finishing of stone
- C239 Manufacture of abrasive products and non-metallic mineral products n. e.c.
- C241 Manufacture of basic iron and steel and of ferro-alloys
- C242 Manufacture of tubes, pipes, hollow profiles and related fittings, of steel
- C243 Manufacture of other products of first processing of steel
- C244 Manufacture of basic precious and other non-ferrous metals
- C245 Casting of metals
- C251 Manufacture of structural metal products
- C252 Manufacture of tanks, reservoirs and containers of metal
- C253 Manufacture of steam generators, except central heating hot water boilers
- C254 Manufacture of weapons and ammunition
- C255 Forging, pressing, stamping and roll-forming of metal; powder metallurgy
- C256 Treatment and coating of metals; machining
- C257 Manufacture of cutlery, tools and general hardware
- C259 Manufacture of other fabricated metal products
- C261 Manufacture of electronic components and boards
- C262 Manufacture of computers and peripheral equipment
- C263 Manufacture of communication equipment
- C264 Manufacture of consumer electronics
- C265 Manufacture of instruments and appliances for measuring, testing and navigation; watches and clocks

- C266 Manufacture of irradiation, electromedical and electrotherapeutic equipment
- C267 Manufacture of optical instruments and photographic equipment
- C268 Manufacture of magnetic and optical media
- C271 Manufacture of electric motors, generators, transformers and electricity distribution and control apparatus
- C272 Manufacture of batteries and accumulators
- C273 Manufacture of wiring and wiring devices
- C274 Manufacture of electric lighting equipment
- C275 Manufacture of domestic appliances
- C279 Manufacture of other electrical equipment
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- C283 Manufacture of agricultural and forestry machinery
- C284 Manufacture of metal forming machinery and machine tools
- C289 Manufacture of other special-purpose machinery
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- C293 Manufacture of parts and accessories for motor vehicles
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- C303 Manufacture of air and spacecraft and related machinery
- C304 Manufacture of military fighting vehicles
- C309 Manufacture of transport equipment n.e.c.
- C310 Manufacture of furniture
- C321 Manufacture of jewellery, bijouterie and related articles
- C322 Manufacture of musical instruments
- C323 Manufacture of sports goods
- C324 Manufacture of games and toys
- C325 Manufacture of medical and dental instruments and supplies
- C329 Manufacturing n.e.c.
- C331 Repair of fabricated metal products, machinery and equipment
- C332 Installation of industrial machinery and equipment
- D351 Electric power generation, transmission and distribution

- D352 Manufacture of gas; distribution of gaseous fuels through mains
- D353 Steam and air conditioning supply
- E360 Water collection, treatment and supply
- E370 Sewerage
- E381 Waste collection
- E382 Waste treatment and disposal
- E383 Materials recovery
- E390 Remediation activities and other waste management services

Sector 4. Please select from list (Level 3 NACE rev.2 excluding services)

- A011 Growing of non-perennial crops
- A012 Growing of perennial crops
- A013 Plant propagation
- A014 Animal production
- A015 Mixed farming
- A016 Support activities to agriculture and post-harvest crop activities
- A017 Hunting, trapping and related service activities
- A021 Silviculture and other forestry activities
- A022 Logging
- A023 Gathering of wild growing non-wood products
- A024 Support services to forestry
- A031 Fishing
- A032 Aquaculture
- B051 Mining of hard coal
- B052 Mining of lignite
- B061 Extraction of crude petroleum
- B062 Extraction of natural gas
- B071 Mining of iron ores
- B072 Mining of non-ferrous metal ores
- B081 Quarrying of stone, sand and clay
- B089 Mining and quarrying n.e.c.
- B091 Support activities for petroleum and natural gas extraction
- B099 Support activities for other mining and quarrying
- C101 Processing and preserving of meat and production of meat products
- C102 Processing and preserving of fish, crustaceans and molluscs

- C103 Processing and preserving of fruit and vegetables
- C104 Manufacture of vegetable and animal oils and fats
- C105 Manufacture of dairy products
- C106 Manufacture of grain mill products, starches and starch products
- C107 Manufacture of bakery and farinaceous products
- C108 Manufacture of other food products
- C109 Manufacture of prepared animal feeds
- C110 Manufacture of beverages
- C120 Manufacture of tobacco products
- C131 Preparation and spinning of textile fibres
- C132 Weaving of textiles
- C133 Finishing of textiles
- C139 Manufacture of other textiles
- C141 Manufacture of wearing apparel, except fur apparel
- C142 Manufacture of articles of fur
- C143 Manufacture of knitted and crocheted apparel
- C151 Tanning and dressing of leather; manufacture of luggage, handbags, saddlery and harness; dressing and dyeing of fur
- C152 Manufacture of footwear
- C161 Sawmilling and planing of wood
- C162 Manufacture of products of wood, cork, straw and plaiting materials
- C171 Manufacture of pulp, paper and paperboard
- C172 Manufacture of articles of paper and paperboard
- C181 Printing and service activities related to printing
- C182 Reproduction of recorded media
- C191 Manufacture of coke oven products
- C192 Manufacture of refined petroleum products
- C201 Manufacture of basic chemicals, fertilisers and nitrogen compounds, plastics and synthetic rubber in primary forms
- C202 Manufacture of pesticides and other agrochemical products
- C203 Manufacture of paints, varnishes and similar coatings, printing ink and mastics
- C204 Manufacture of soap and detergents, cleaning and polishing preparations, perfumes and toilet preparations
- C205 Manufacture of other chemical products



- C206 Manufacture of man-made fibres
- C211 Manufacture of basic pharmaceutical products
- C212 Manufacture of pharmaceutical preparations
- C221 Manufacture of rubber products
- C222 Manufacture of plastics products
- C231 Manufacture of glass and glass products
- C232 Manufacture of refractory products
- C233 Manufacture of clay building materials
- C234 Manufacture of other porcelain and ceramic products
- C235 Manufacture of cement, lime and plaster
- C236 Manufacture of articles of concrete, cement and plaster
- C237 Cutting, shaping and finishing of stone
- C239 Manufacture of abrasive products and non-metallic mineral products n. e.c.
- C241 Manufacture of basic iron and steel and of ferro-alloys
- C242 Manufacture of tubes, pipes, hollow profiles and related fittings, of steel
- C243 Manufacture of other products of first processing of steel
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- C245 Casting of metals
- C251 Manufacture of structural metal products
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- C253 Manufacture of steam generators, except central heating hot water boilers
- C254 Manufacture of weapons and ammunition
- C255 Forging, pressing, stamping and roll-forming of metal; powder metallurgy
- C256 Treatment and coating of metals; machining
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- C266 Manufacture of irradiation, electromedical and electrotherapeutic equipment
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- C332 Installation of industrial machinery and equipment
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- D352 Manufacture of gas; distribution of gaseous fuels through mains
- D353 Steam and air conditioning supply
- E360 Water collection, treatment and supply
- E370 Sewerage
- E381 Waste collection
- E382 Waste treatment and disposal
- E383 Materials recovery
- E390 Remediation activities and other waste management services

Sector 5. Please select from list (Level 3 NACE rev.2 excluding services)

- A011 Growing of non-perennial crops
- A012 Growing of perennial crops
- A013 Plant propagation
- A014 Animal production
- A015 Mixed farming
- A016 Support activities to agriculture and post-harvest crop activities
- A017 Hunting, trapping and related service activities
- A021 Silviculture and other forestry activities
- A022 Logging
- A023 Gathering of wild growing non-wood products
- A024 Support services to forestry
- A031 Fishing
- A032 Aquaculture
- B051 Mining of hard coal
- B052 Mining of lignite
- B061 Extraction of crude petroleum
- B062 Extraction of natural gas
- B071 Mining of iron ores
- B072 Mining of non-ferrous metal ores
- B081 Quarrying of stone, sand and clay
- B089 Mining and quarrying n.e.c.
- B091 Support activities for petroleum and natural gas extraction
- B099 Support activities for other mining and quarrying
- C101 Processing and preserving of meat and production of meat products
- C102 Processing and preserving of fish, crustaceans and molluscs

- C103 Processing and preserving of fruit and vegetables
- C104 Manufacture of vegetable and animal oils and fats
- C105 Manufacture of dairy products
- C106 Manufacture of grain mill products, starches and starch products
- C107 Manufacture of bakery and farinaceous products
- C108 Manufacture of other food products
- C109 Manufacture of prepared animal feeds
- C110 Manufacture of beverages
- C120 Manufacture of tobacco products
- C131 Preparation and spinning of textile fibres
- C132 Weaving of textiles
- C133 Finishing of textiles
- C139 Manufacture of other textiles
- C141 Manufacture of wearing apparel, except fur apparel
- C142 Manufacture of articles of fur
- C143 Manufacture of knitted and crocheted apparel
- C151 Tanning and dressing of leather; manufacture of luggage, handbags, saddlery and harness; dressing and dyeing of fur
- C152 Manufacture of footwear
- C161 Sawmilling and planing of wood
- C162 Manufacture of products of wood, cork, straw and plaiting materials
- C171 Manufacture of pulp, paper and paperboard
- C172 Manufacture of articles of paper and paperboard
- C181 Printing and service activities related to printing
- C182 Reproduction of recorded media
- C191 Manufacture of coke oven products
- C192 Manufacture of refined petroleum products
- C201 Manufacture of basic chemicals, fertilisers and nitrogen compounds, plastics and synthetic rubber in primary forms
- C202 Manufacture of pesticides and other agrochemical products
- C203 Manufacture of paints, varnishes and similar coatings, printing ink and mastics
- C204 Manufacture of soap and detergents, cleaning and polishing preparations, perfumes and toilet preparations
- C205 Manufacture of other chemical products

- C206 Manufacture of man-made fibres
- C211 Manufacture of basic pharmaceutical products
- C212 Manufacture of pharmaceutical preparations
- C221 Manufacture of rubber products
- C222 Manufacture of plastics products
- C231 Manufacture of glass and glass products
- C232 Manufacture of refractory products
- C233 Manufacture of clay building materials
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Sector 7. Please identify and indicate relevant Level 4 code from [NACE rev. 2 Classification of Economic Activities in the European Community](#)

*5 character(s) maximum*

Sector 8. Please identify and indicate relevant Level 4 code from [NACE rev. 2 Classification of Economic Activities in the European Community](#)

*5 character(s) maximum*

Sector 9. Please identify and indicate relevant Level 4 code from [NACE rev. 2 Classification of Economic Activities in the European Community](#)

*5 character(s) maximum*

Sector 10. Please identify and indicate relevant Level 4 code from [NACE rev. 2 Classification of Economic Activities in the European Community](#)

*5 character(s) maximum*

### Specific implementation issues

10. Please indicate to what extent you agree that the calculation of the carbon content of imported products should be based on

	i. Strongly agree	ii. Somewhat agree	iii. Somewhat disagree	iv. Strongly disagree

a. EU product benchmarks for free allocation under the Emissions Trading System, i.e. the greenhouse gases emitted during the production process	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
b. Country of origin-specific product benchmarks to be defined for direct emissions	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
c. Global product benchmarks to be defined for direct emissions	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

-

	i. Strongly agree	ii. Somewhat agree	iii. Somewhat disagree	iv. Strongly disagree
d. EU emission factors to be defined for indirect emissions, i.e. the emissions caused by the generation of electricity used to produce the covered product	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
e. Country of origin-specific emission factors to be defined for indirect emissions	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
f. Global emission factors to be defined for indirect emissions	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

-

	i. Strongly agree	ii. Somewhat agree	iii. Somewhat disagree	iv. Strongly disagree
g. A factor for both direct and indirect emissions taking into account the production method used in the installation where it was produced	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
h. A method that traces the build-up of emissions across the value chain of a product in different countries	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
i. Giving importers the possibility to demonstrate in a verifiable manner how the product was manufactured	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

-

	i. Strongly agree	ii. Somewhat agree	iii. Somewhat disagree	iv. Strongly disagree

j. The Commission Product Environmental Footprint method (which is in line with the international standard ISO 14067 and considers both direct and indirect impacts)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
k. Product Environmental Footprint Category Rules developed based on the Commission Product Environmental Footprint method, which also include a benchmark reflecting average environmental performance	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

11. Please indicate to what extent you agree that the verification of the carbon content of imported products should:

	i. Strongly agree	ii. Somewhat agree	iii. Somewhat disagree	iv. Strongly disagree
a. Be based on independent third party verification	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
b. Allow for self-certification, supported by occasional external audit	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

12. Please indicate to what extent you agree with the following statement

	i. Strongly agree	ii. Somewhat agree	iii. Somewhat disagree	iv. Strongly disagree
Provided that it is necessary to achieve the objective of reducing the risk of carbon leakage, the possibility to grant a rebate to EU exporters should be explored under the Carbon Border Adjustment Mechanism	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

13. The Carbon Border Adjustment Mechanism should have adequate anti-circumvention mechanisms.

13.1 Please indicate which of the following avenues for circumvention would pose significant risks and should be prevented:

	i. Strongly agree	ii. Somewhat agree	iii. Somewhat disagree	iv. Strongly disagree
a. Substitution between primary inputs and semi-finished goods	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
b. Resource shuffling in the form allocating low carbon production only to the EU with no or negative effect to the overall CO2 emissions	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

c. Transshipment strategies if the possibility for exempted countries is included	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
d. Avoidance based on slight modification of the product	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

**13.2 Other avenues for circumvention, not indicated under 13.1 above. Please specify:**

*250 character(s) maximum*

**14. Additional considerations on the scope of the Carbon Border Adjustment Mechanism**

**14.1. Please indicate to what extent you agree with the following statements concerning the design of the Carbon Border Adjustment Mechanism**

	i. Strongly agree	ii. Somewhat agree	iii. Somewhat disagree	iv. Strongly disagree
a. Should not allow for any exemptions. All imports should be subject to a carbon border adjustment mechanism equally no matter where they came from	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
b. Should allow for exemptions for least developed countries	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

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	i. Strongly agree	ii. Somewhat agree	iii. Somewhat disagree	iv. Strongly disagree
c. If a partner country has climate policies creating sufficient incentives for emission reductions, similarly to the EU for the products in scope then no Carbon Border Adjustment should be levied (relevant policies could include national or regional emissions trading system, carbon tax, or regulatory system in relevant sectors at home)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
d. If a partner country has climate policies creating sufficient incentives for emission reductions which result in higher carbon costs than in the EU for the products in scope, then the Carbon Border Adjustment should result in a credit for the importer for the difference in carbon cost	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

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## 14.2 Other considerations on scope and exemptions not covered by 14.1 above.

Please specify:

*250 character(s) maximum*

## Potential impacts

The impacts will vary depending on the design and in particular on the sectors that will be covered by the Carbon Border Adjustment Mechanism. The measure is expected to ensure that the efforts of the EU and its industry for a transition to a climate neutral economy are not jeopardised by carbon leakage. The measure should be consistent with the ambition of the European Green Deal to achieve a just, socially balanced and fair transition.

15. Please indicate if you agree with the following statement

### 15.1 Economic impacts

	i. Strongly agree	ii. Somewhat agree	iii. Somewhat disagree	iv. Strongly disagree
a. The Carbon Border Adjustment Mechanism would increase costs for EU businesses in downstream sectors	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
b. The Carbon Border Adjustment Mechanism would have a positive impact on the competitiveness of EU industry in the sectors concerned	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
c. The Carbon Border Adjustment Mechanism would negatively affect EU exporters in the sectors concerned	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
d. The Carbon Border Adjustment Mechanism would have a positive impact on investment in the EU	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
e. The Carbon Border Adjustment Mechanism would encourage the consumption of less carbon intensive products	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
f. The Carbon Border Adjustment Mechanism would have a positive impact on innovation in the EU and elsewhere by promoting clean technologies	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
g. The Carbon Border Adjustment Mechanism would result in the relocation or replacement of activities from partner countries into the EU	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

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h. The Carbon Border Adjustment Mechanism would result in the relocation or replacement of activities from the EU to partner countries in the downstream sectors to which Carbon Border Adjustment Mechanism would apply	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
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## 15.2 Environmental impacts

	i. Strongly agree	ii. Somewhat agree	iii. Somewhat disagree	iv. Strongly disagree
a. The Carbon Border Adjustment Mechanism would improve the effectiveness of policies aimed at fighting climate change in the EU	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
b. The Carbon Border Adjustment Mechanism would be effective in reducing carbon emissions globally	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
c. The Carbon Border Adjustment Mechanism would promote the adoption of similarly ambitious climate policies by our trading partners and thus contribute to the reduction of global emissions	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

## 15.3 Social impacts

	i. Strongly agree	ii. Somewhat agree	iii. Somewhat disagree	iv. Strongly disagree
a. The Carbon Border Adjustment Mechanism would avoid job losses in the EU due to the substitution of EU production by production from partner countries with lower climate ambition.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
b. Depending on the sectors covered, the Carbon Border Adjustment Mechanism, as part of a broader climate policy, would increase the price of consumer products including those related to basic needs.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
c. The Carbon Border Adjustment Mechanism would have negative effects in terms of jobs in sectors downstream from those to which it applies by increasing the cost of their inputs, which their competitors in partner countries do not bear.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
d. Potential negative effects on the living standards of the poorer segments of the population should be compensated	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

#### 15.4 Administrative impacts

a. The Carbon Border Adjustment Mechanism would increase the administrative burden for exporters and importers into the EU

- i. Yes
- ii. No

Due to:

- i. Complexity of establishing the carbon content of the product
- ii. Alignment with measurement standards
- iii. Verification and reporting procedures

b. The Carbon Border Adjustment Mechanism is likely to increase the administrative burden for public administrations in the EU

- i. Yes
- ii. No

Due to:

- i. Monitoring needs
- ii. Adjustment of customs systems

c. The Carbon Border Adjustment Mechanism is likely to result in higher administrative burden for SMEs

- i. Yes
- ii. No

15.5 Other economic, environmental, social or administrative impacts, not indicated above.

Please specify.

*1000 character(s) maximum*

#### Final remarks

Should you wish to provide additional information (for example a position paper) or raise specific points not covered by the questionnaire, you can upload your additional document here.

Please note that the uploaded document will be published alongside your response to the questionnaire which is the essential input to this open public consultation. The document is an optional complement and serves as additional background reading to better understand your position.



## Please upload your file

The maximum file size is 1 MB

Only files of the type pdf,txt,doc,docx,odt,rtf are allowed

## Please provide your hyperlinks

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