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Tarih : 20/05/2026
Sayı : 6450225777-E.725
Konu : Üçüncü Ülkelerde Ödenen Karbon Ücretlerinin SKDM Yükümlülüğünden Düşülmesine Dair Uygulama Tüzüğü

İlgi : 18/05/2026 tarihli ve E-79668890-743-00122226380 sayılı yazı

İlgide kayıtlı Ticaret Bakanlığı Uluslararası Anlaşmalar ve Avrupa Birliği Genel Müdürlüğü tarafından Kuruluşumuza iletilen "Üçüncü Ülkelerde Ödenen Karbon Ücretlerinin SKDM Yükümlülüğünden Düşülmesine Dair Uygulama Tüzüğü" konulu yazı ekte yer almaktadır.

Bilgilerinizi ve katılımcılarınıza duyurulması hususlarını rica ederiz.

Saygılarımızla,

e-imzalıdır
Şükran ERDOĞAN
Genel Sekreter V.

e-imzalıdır
Memiş KÜTÜKCÜ
Yönetim Kurulu Başkanı

Ek :
1- Üçüncü Ülkelerde Ödenen Karbon Ücretlerinin SKDM Yükümlülüğünden Düşülmesine Dair Uygulama Tüzüğü (3 Sayfa)
2- Annex Carbon Price Paid in a Third Country (27 Sayfa)
3- Synopsis Report on Calls for Evidence on the implementing act on the car (14 Sayfa)

Dağıtım:
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SDP : 14.01 - 01 - BASIN YAYIN (GENEL)
Evrak No : 78451300-14-01-38389
Evrak Tarihi : 21-05-2026

T.C. TİCARET BAKANLIĞI ULUSLARARASI ANLAŞMALAR VE AVRUPA BİRLİĞİ GENEL MÜDÜRLÜĞÜ
Tarih: 15/05/2026
Sayı: E-79668890-743-00122226380
Sistem Kayıt Tarihi: 14/05/2026

T.C.
TİCARET BAKANLIĞI
şmalar ve Avrupa Birliği Genel Müdürlüğü

Sayı : E-7966)
Konu : Üçüncü Ülkelerde Ödenen Karbon Ücretlerinin SKDM Yükümlülüğünden Düşülmesine Dair Uygulama Tüzüğü

DAĞITIM YERLERİNE

Bilindiği olduğu üzere, Avrupa Birliği Sınırda Karbon Düzenleme Mekanizması'nın (SKDM) kesin dönem uygulamalarına ilişkin ikincil mevzuat paketi 17 Aralık 2025 tarihinde yayımlanmış ancak üçüncü ülkelerde ödenen karbon ücretlerinin SKDM yükümlülüğünden düşülmesine ilişkin düzenleme bu paket içinde yer almamıştı.

Bu defa, 13 Mayıs 2026 tarihinde Avrupa Komisyonu tarafından üçüncü ülkelerde ödenen karbon ücretlerinin SKDM yükümlülüğünden düşülmesine yönelik usul ve esasların belirleyen Tüzük taslağı kamuoyuyla paylaşılmıştır.

Aynı emisyonlar üzerinden hem üçüncü ülkede hem de AB'de mükerrer karbon maliyeti doğmasını önlemeyi amaçlayan Taslak Tüzükte;

- SKDM sertifikası indiriminde dikkate alınacak üçüncü ülkede ödenen karbon maliyetlerinin kapsamı (karbon vergisi, harç, ücret veya bağlayıcı emisyon ticaret sistemi maliyetleri),
- Karbon fiyatının doğrudan emisyonlar, uygulanabildiği hallerde dolaylı emisyonlar ve ürün içinde gömülü öncül girdilerden kaynaklanan emisyonlar bakımından hesaba katılması,
- Gömülü emisyonların gerçek değerler veya varsayılan değerler üzerinden hesaplanmasına göre, fiilen ödenen karbon fiyatı ya da Komisyonca yayımlanacak varsayılan karbon fiyatı üzerinden mahsuplaşma hesabı,
- Üçüncü ülke karbon fiyatlandırma sistemleri ile SKDM sistem sınırları arasındaki farklılıkların nasıl ele alınacağı ve bu kapsamda %5'e kadar esnekliğin uygulanması,
- Üçüncü ülke karbon fiyatlandırma mekanizmalarında kullanılan karbon kredilerinin hangi şartlar altında fiilen ödenen karbon fiyatı hesabına dahil edilebileceği,
- Ücretsiz tahsisat, muafiyet, indirimli oran, geri ödeme, parasal telafi ve dolaylı maliyet tazmini gibi unsurların fiilen ödenen karbon fiyatına yansıtılması,
- Karbon fiyatlandırma gelirlerinden sağlanan karbonsuzlaşma desteklerinin hangi koşullarda karbon fiyatını azaltan bir telafi olarak değerlendirilip değerlendirilemeyeceği,
- Üretici tesis tarafından hazırlanacak karbon fiyatı raporunun içeriği, formatı, dili ve Komisyonun standart elektronik şablonunun kullanımı,
- Karbon fiyatının ödendiğini kanıtlamak üzere hangi ödeme belgelerinin, resmi kayıtların, tahsisat/kredi teslim kayıtlarının veya piyasa fiyatı verilerinin sunulması,
- Fiilen ödenen karbon fiyatına ilişkin belgelerin bağımsız ve akredite bir kişi tarafından nasıl inceleneceği, izleneceği ve sertifikalandırılacağı,

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ULUSLARARASI
ANLAŞMALAR VE
AVRUPA BİRLİĞİ
GENEL MÜDÜRLÜĞÜ
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- Karb tifikalandıracak bağımsız kişinin akreditasyonu, teknik yeterliliği, tarafsızlı
- Üçün rimleriyle ödenen karbon fiyatlarının Avroya nasıl çevrileceği ve SKDM sertifikası miktarının hangi formülle hesaplanacağı

hususlarına dair kurallar belirlenmektedir.

Söz konusu Taslak Tüzük için kamu istişare süreci başlatılmış olup, 10 Haziran 2026 son tarihine olabilecek görüşlerin aşağıdaki internet adresi üzerinden Komisyon ile paylaşılması mümkün bulunmaktadır.

https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/14830-Carbon-border-adjustment-mechanism-CBAM-carbon-price-paid-in-a-third-country_en

Bilgilerini ve yukarıdaki hususların üye firmalarınıza duyurularak kamu istişare sürecine ilişkin Komisyona iletilen görüşlerin ayrıca Bakanlığımızla da (ayrıca abtekpazar@ticaret.gov.tr adresiyle) paylaşılması hususunda gereğini rica ederim.

Fatma Canan NİLÜFER DORA
Bakan a.
Genel Müdür Yardımcısı

Ek:
1- Tüzük Taslağı ve Eki
2- Paydaş Görüşleri Raporu

Dağıtım:

Dış Ekonomik İlişkiler Kuruluna
Türkiye İhracatçılar Meclisi Genel Sekreterliğine
Türkiye Odalar Ve Borsalar Birliğine

İmmib Genel Sekreterliğine
İstanbul Kimyevi Maddeler Ve Mamülleri İhracatçıları Birliğine
Orta Anadolu İhracatçı Birlikleri Genel Sekreterliğine
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T.C. TİCARET
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ULUSLARARASI
ANLAŞMALAR VE
[illegible]KUPA BİRLİĞİ
GENEL MÜDÜRLÜĞÜ
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Çelik Dış Ticare[illegible]
Çelik İhracatçıla[illegible]
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Girişimci Alüminyum Sanayici Ve İş İnsanları Derneğine
Gübre Üreticileri, İthalatçıları Ve İhracatçıları Derneğine
İş Dünyası Ve Sürdürülebilir Kalkınma Derneğine
Müsiad Müstakil Sanayici Ve İşadamları Derneğine
Organize Sanayi Bölgeleri Üst Kuruluşu-Osbüke
Paslanmaz Çelik Derneğine
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SDP : 14.01 - 01 - BASIN YAYIN (GENEL)
Evrak No : 78451300-14.01-38389
Evrak Tarihi : 21-05-2026

Ref. Ares(2026)4841230 - 13/05/2026

EUROPEAN
COMMISSION

Brussels, XXX
[…](2025) XXX draft

ANNEXES 1 to 4

ANNEXES

to the

Commission implementing Regulation (EU) .../...

laying down rules for the application of Regulation (EU) 2023/956 as regards the conversion of the carbon price paid in a third country into a corresponding reduction in the number of CBAM certificates to be surrendered, the evidence of payment of that carbon price, the qualifications of the independent person and conditions to ascertain its independance and qualifications

SDP : 14.01 - 01 - BASIN YAYIN (GENEL)
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Evrak Tarihi : 21-05-2026

ANNEX I – Methodology for the calculation of the carbon price effectively paid for the embedded emission

SDP : 14.01 - 01 - BASIN YAYIN (GENEL)
Evrak No : 78451300-14.01-38389
Evrak Tarihi : 21-05-2026

This Annex lays down methods for attributing the carbon price effectively paid for the specific embedded emissions in goods.

1. DEFINITIONS

For the purposes of this Annex, and of Annexes II and III, the following definitions apply:

(1) 'CPM emissions' means emissions reported and confirmed under the carbon price mechanism;

(2) 'rebate or other forms of compensation on emissions' means the share of the CPM emissions compensated by rebates or other forms of compensation;

(3) 'carbon tax' means a carbon tax, levy or fee, under the form of a point source carbon tax or fuel-based carbon tax set by the third-country authorities;

(4) 'point source carbon tax' means a direct tax, levy or fee levied on greenhouse gas emissions that originate from a specific, identifiable source;

(5) 'fuel-based carbon tax' means a direct tax, levy or fee levied on the carbon content of fossil fuel supply whose emissions are released during the production of goods;

(6) 'CPM reporting period' means the period that is applicable to the monitoring and reporting of the CPM emissions;

(7) 'carbon credit' means a credit issued by a crediting mechanism representing an emission reduction or removal of greenhouse gas emissions from the atmosphere, which is generated by a mitigation activity and implemented in operations whose emissions are not covered by the carbon price mechanism;

(8) 'international carbon credit' means a carbon credit related to a mitigation activity implemented in a country other than the country of production of a good.

2. ATTRIBUTION STEPS IN THE METHODOLOGY

The carbon price effectively paid on specific embedded emissions for goods shall be attributed by carrying out the following consecutive steps:

(a) determine the carbon price paid per tonne of CPM emissions, expressed in tCO_2e, in accordance with section 3, for each carbon price mechanism covering greenhouse gas emissions released during the production of goods;

(b) attribute the CPM emissions to each good, in accordance with section 4, for each carbon price mechanism covering greenhouse gas emissions released during the production of goods;

(c) attribute the rebate or other forms of compensation on emissions to each good, in accordance with section 5, for each carbon price mechanism covering greenhouse gas emissions released during the production of goods;

(d) attribute the carbon price effectively paid to specific embedded emissions and determine data points that are necessary for the CBAM declarant, in accordance with section 6, for each carbon price mechanism covering greenhouse gas emissions released during the production of goods;

(e) convert the carbon price effectively paid to euro and aggregate the total carbon price effectively paid on specific embedded emissions, in accordance with section 7.

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Where this Annex specifies the evidence supporting the carbon price effectively paid, that evidence shall pertain to the specific installation producing goods, including when the carbon price is paid by an entity subject to a carbon price mechanism applying to several installations.

3. DETERMINATION OF THE APPLICABLE CARBON PRICE PER TONNE OF EMISSIONS, BASED ON THE FORM OF THE CARBON PRICE MECHANISM

For each carbon price mechanism covering greenhouse gas emissions associated with the production of goods, a carbon price per tonne of emissions shall be determined.

Where CPM emissions cover direct emissions, the carbon price per tonne of direct emissions (CP_{di}) shall be determined as specified in sections 3.1 and 3.3.

Where CPM emissions cover indirect emissions, the carbon price per tonne of indirect emissions (CP_{ind}) shall be determined as specified in sections 3.2 and 3.3.

Where CPM emissions cover both direct and indirect emissions, the carbon price shall be established per tonne of direct emissions or indirect emissions separately.

Where rebates or other forms of compensation takes the form of a refund in monetary value, the corresponding reduction of the carbon price shall be established as specified in section 3.4.

3.1. Determination of the carbon price associated with direct emissions

Where the carbon price applies to direct emissions of the installation that is subject to an emissions trading system or a point source carbon tax, the carbon price on direct emissions shall be established based on the following equation:

$$CP_{DIR} = CP / EM_CPM_{DIR} \qquad \textit{(equation 1)}$$

Where:

– CP_{DIR} is the carbon price per tonne of CPM emissions associated with direct emissions, of the installation producing goods, expressed as price per tonne of CO_2e;

– *CP* is the total carbon price paid by the operator on direct emissions for the relevant CPM reporting period, expressed in the jurisdiction's local currency unit;

– EM_CPM_{DIR} is the total CPM emissions associated with direct emissions for the relevant CPM reporting period, expressed as tonnes CO_2e.

Where the carbon price applies to emissions of imported electricity (as a CBAM good), the carbon price may be established by using the relevant default carbon price made available by the Commission or based on an actual carbon price when the reporting of embedded emissions is established based on actual values, consistent with the emission factor for the imported electricity determined on the basis of actual emissions reported in the emissions report, in accordance with section 1 of Annex IV to Implementing Regulation (EU) 2025/2547.

Where the carbon price applies to a fuel-based carbon price mechanism, section 3.3.3 shall apply.

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3.2. Determination of the carbon price associated with indirect emissions

Where the carbon price applies to indirect emissions of the installation, the carbon price on indirect emissions shall be established based on an annual average carbon price per unit of electricity purchased, using the following equation:

$$CP_{IND} = CP/(Q_{IND} \times EF) \quad \textit{(equation 2)}$$

Where:

– CP_{IND} is the average carbon price per tonne of CPM emissions, associated with the indirect emissions of the installation producing goods, expressed as price per tonne of CO_2e;

– *CP* is the total carbon price paid on indirect emissions, expressed in the jurisdiction's local currency unit;

– Q_{IND} is the relevant quantity of electricity consumed, expressed in MWh or TJ;

– *EF* is the emissions factor relevant for the electricity consumed, expressed in tonnes of CO_2e/MWh or tonnes of CO_2e/TJ.

The emissions factor for electricity EF in equation 2 shall be consistent with the actual embedded indirect emissions in accordance with Article 8 of Implementing Regulation (EU) 2025/2547.

By way of derogation from the first subparagraph, the carbon price associated with indirect emissions (*CP ind*) may be a default carbon price made available by the Commission.

3.3. The types of carbon price mechanism under which the carbon price is paid

The carbon price covered by direct or indirect emissions shall be established based on the type of carbon price mechanisms listed in the following sections. The evidence of such carbon price is specified in section 3.5.

3.3.1. Emissions Trading System

Where an emissions trading system is applicable, the total carbon price paid on direct emissions in equation 1 and the total carbon price paid on indirect emissions in equation 2 shall be established separately by the weighted average auctioning price of the allowance over the reporting period, expressed in price per tonne of CO_2e, made available by the relevant authorities responsible for the emissions trading system.

Where the weighted average auctioning price of the allowance is not available, the average exchange price of the allowance on the recognised secondary market as published by the public authority responsible for the management of the secondary market shall be applied. If the average exchange price is not published by the responsible public authority or evidence of that published exchange price cannot be provided, the average exchange price as published by the exchange or trading platform that is authorised and supervised by the jurisdiction's authorities shall be applied.

By way of derogation from the first subparagraph, CP_{DIR} and CP_{IND} in equations 1 and 2, respectively, may be established based on the average of the cost price of the operator's compliance units at the point of purchase. When determining this average, the operator shall

only take into account those compliance units that are in the account of the emissions trading system's registry at the reporting period used for reporting embedded emissions.

3.3.2. Point source carbon tax

Where a point-source carbon tax is applicable, CP_{DIR} and CP_{IND} in equations 1 and 2, respectively, shall be established separately by the applicable carbon tax rate, expressed in carbon price paid per tonne of CO_2e.

If a reduced carbon tax rate is paid in accordance with the legislation established under the carbon tax, the carbon price rate shall be that reduced carbon tax rate expressed in carbon price paid per tonne of CPM emissions associated with direct or indirect emissions.

Where the carbon tax rate was modified during the reporting period, a time weighted average carbon price rate shall be established, summing up the original carbon price rate and the modified carbon price rate in proportion to their respective application period over the reporting period.

3.3.3. Fuel-based carbon tax

Where a fuel-based carbon tax is applicable to fuels consumed by the installation, CP_{DIR} in equation 1 and CP_{IND} in equation 2 shall be established separately on the basis of the weighted average carbon tax rate for the fuels that are subject to the carbon tax.

For that purpose:

(a) the following equation shall be used for fuels combusted in the installation where the CPM emissions are associated with direct emissions:

$$\boldsymbol{CP_{DIR} = \Sigma_{f=1}^{n}\left[TaxRateFuel_f \times Q_{FUEL_f}\right] / \left(\Sigma_{f=1}^{n}\left[Q_{FUEL_f} \times DEF_f\right]\right)} \quad \textit{(equation 3a)}$$

(b) the following equation shall be used for fuels combusted in the installation where the CPM emissions are associated with indirect emissions:

$$\boldsymbol{CP_{IND} = \Sigma_{f=1}^{n}\left[TaxRateFuel_f \times Q_{FUEL_f}\right] / \left(\Sigma_{f=1}^{n}\left[Q_{FUEL_f} \times DEF_f\right]\right)} \quad \textit{(equation 3b)}$$

Where:

– CP_{DIR} is the weighted average carbon price rate per tonne of CPM emissions, associated with direct emissions of the installation producing the goods, expressed as price per tonne of CO_2e;

– CP_{IND} is the weighted average carbon price rate per tonne of CPM emissions, associated with indirect emissions of the installation producing the goods, expressed as price per tonne CO_2e;

– $TaxRateFuel_f$ is the specific tax rate per unit of fuel *f* that is applicable to the fuel as prescribed in the carbon tax to which the operator is subject;

– $QFUEL_f$ is the quantity of fuel *f* consumed at the installation in the CPM reporting period that is subject to the carbon tax, expressed in units of fuel;

– DEF_f is the default emissions factor relevant for the fuel *f* consumed, expressed in tonnes CO_2e /unit of fuel;

– $\Sigma_{f=1}^{n}$ is the sum of all specific tax rates for the relevant fuels subject to a specific carbon tax.

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The default emissions factors in equations 3a and 3b shall be based on standard factors that are prescribed in the jurisdiction's legislation or specified by the tax authority as the basis for deriving the tax per unit of fuel based on its emissions content.

If those emission factors are not available, standard factors shall be applied that are used by the country where the installation is located for its latest national inventory submission to the Secretariat of the United Nations Framework Convention on Climate Change. Where those national inventory standard factors are not available, standard factors contained in the latest Guidelines for National Greenhouse Gas ('GHG') Inventories of the Intergovernmental Panel on Climate Change shall be applied. In those cases, the carbon tax rate established under the carbon tax legislation that is applicable to the fuel ($TaxRateFuel_f$) and the emission factor relevant for that fuel consumed (DEF_f) shall be consistent with the carbon price rate established under the legislation.

Where a reduced carbon tax rate is applicable per unit of fuel consumed in accordance with the legislation established under the carbon tax, $TaxRateFuel_f$ shall be the reduced tax rate per unit of fuel consumed, that is applicable to the fuel unless there is evidence that the operator has paid the full reference carbon tax rate and that no reduction on the tax rate was applied.

Where the carbon tax rate of a fuel *f* was modified during the reporting period, a time-weighted average carbon price rate shall be established and used for the purpose of determining $TaxRateFuel_f$ in equation 3a and 3b.

3.3.4. Carbon price mechanisms with different compliance options

Where the carbon price applying to the direct emissions or indirect emissions of the installation is paid under different forms of compliance options including using carbon credits to meet compliance obligations under an emissions trading system or a carbon tax, allowing installations in an emissions trading system to purchase missing allowances or credits of an equivalent nature at a fixed rate established by the responsible authorities, CP_{DIR} in equation 1 and CP_{IND} in equation 2, shall be established separately by applying a weighted average carbon price rate using:

(a) the following equation where the CPM emissions are associated with direct emissions:

$$\boldsymbol{CP_{DIR} = \Sigma_{i=1}^{n}\left[CP_{CO_i} \times EM_{CO_i}\right] / \Sigma_{i=1}^{n}\left[EM_{CO_i}\right]} \quad \textit{(equation 4a)}$$

(b) the following equation where the CPM emissions are associated with indirect emissions:

$$\boldsymbol{CP_{IND} = \Sigma_{i=1}^{n}\left[CP_{CO_i} \times EM_{CO_i}\right] / \Sigma_{i=1}^{n}\left[EM_{CO_i}\right]} \textit{ (equation 4b)}$$

Where:

– CP_{DIR} is the weighted average carbon price per tonne of CPM emissions, associated with direct emissions of the installation producing goods, expressed in price per tonne of CO_2e;

– CP_{IND} is the weighted average carbon price per tonne of CPM emissions, associated with indirect emissions of the installation producing goods, expressed in the price per tonne of CO_2e;

– $CPco_i$ is the carbon price *i* covered by the particular compliance option, expressed in the jurisdiction's local currency unit;

– $EMco_i$ is the quantity of CPM emissions associated with direct emissions or indirect emissions covered by compliance units that are used to meet the compliance obligations under a particular compliance option.

Where the compliance option consists of using carbon credits to meet the compliance obligations under an emissions trading system or carbon tax system, CP_{COi} is the carbon price applicable, by using carbon credits to meet the compliance obligations under an emissions trading system or carbon tax, expressed in the jurisdiction's local currency unit.

For the purpose of determining the carbon price paid, international carbon credits pursuant to Article 6(2) and 6(4) of the Paris Agreement used to meet the compliance obligations under an emissions trading system or carbon tax may only be claimed to a maximum of 10% of the reported and confirmed CPM emissions covered by the third-country carbon price mechanism, so that EMco corresponding to evidenced international carbon credits meeting the conditions set out in section 3.5.4 shall not exceed 10% of $\Sigma_{i=1}^{n}$ [EM_{COi}]. Where more than 10% of the reported and confirmed CPM emissions are covered by such international carbon credits, a price of zero shall be assigned to CPM emissions covered by international carbon credits in excess of this 10% threshold.

$\Sigma_{i=1}^{n}$ [$EM_{CO\,i}$] shall correspond to the total CPM emissions associated with direct or indirect emissions.

3.4. Determination of a price value of rebates or other forms of compensation in monetary value

Where the rebate or other form of compensation takes the form of a refund in monetary value, the rebate or other form of compensation price rate of that refund per tonne of CPM emissions shall be determined by using:

(a) the following equation where the CPM emissions are associated with direct emissions:

$$\boldsymbol{RC_{DIR} = RC_{VALUE}/EM_CPM_{DIR}} \quad \textit{(equation 5a)}$$

(b) the following equation where the CPM emissions are associated with indirect emissions:

$$\boldsymbol{RC_{IND} = RC_{VALUE}/EM_CPM_{IND}} \quad \textit{(equation 5b)}$$

Where:

– RC_{DIR} is the rebate or other form of compensation rate per tonne of CPM emissions associated with direct emissions and the type of refund in this section, expressed in price per tonne of CO_2e;

– RC_{IND} is the rebate or other form of compensation rate per tonne of CPM emissions associated with indirect emissions and the type of refund in this section, expressed in price per tonne of CO_2e;

– RC_{VALUE} is the total price value of rebate or other form of compensation in terms of monetary value received, expressed in local currency;

– EM_CPM_{DIR} is where the refund in monetary value relates to direct emissions, the total CPM emissions associated with direct emissions, expressed in tonnes of CO_2e;

– EM_CPM_{IND} is where the refund in monetary value relates to indirect emissions, including a cost compensation for a carbon price paid on purchased electricity, the total CPM emissions associated with indirect emissions, expressed in tonnes of CO_2e.

The rebate or other form of compensation rate per tonne of emissions associated with the refund in monetary value shall be subtracted from the carbon price rate per tonne of CPM emissions associated with direct emissions or indirect emissions by using:

(a) the following equation where the CPM emissions are associated with direct emissions:

$$\boldsymbol{EFF_CP_{DIR} = CP_{DIR} - RC_{DIR}} \qquad \textit{(equation 6a)}$$

(b) the following equation where the CPM emissions are associated with indirect emissions:

$$\boldsymbol{EFF_CP_{IND} = CP_{IND} - RC_{IND}} \qquad \textit{(equation 6b)}$$

Where:

– EFF_CP_{DIR} is the effective carbon price paid per tonne of CPM emissions associated with direct emissions expressed in tonnes of CO_2e;

– EFF_CP_{IND} is the effective carbon price paid per tonne of CPM emissions associated with indirect emissions expressed in tonnes of CO_2e;

– CP_{DIR} is the carbon price rate or the weighted average carbon price rate per tonne of CPM emissions associated with direct emissions of the installation producing goods, expressed as price per tonne of CO_2e;

– CP_{IND} is the weighted average carbon price rate per tonne of CPM emissions, associated with indirect emissions of the installation producing goods, expressed in the price per tonne of CO_2e;

– RC_{DIR} is the rebate or compensation rate per tonne of emissions associated with direct emissions and the type of refund in this section, expressed in price per tonne of CO_2e;

– RC_{IND} is the rebate or compensation rate per tonne of emissions associated with indirect emissions and the type of refund in this section, expressed in price per tonne of CO_2e.

3.5. Requirements on evidence for the carbon price paid

3.5.1. Emissions Trading System

Where the weighted average auctioning price of the allowance is used to determine the total carbon price paid by the operator in an emissions trading system in accordance with section 3.3.1, evidence of the carbon price in the relevant reporting period shall include all of the following information:

(a) evidence of the weighted average auctioning price, made available by the relevant authorities responsible for administering the carbon pricing scheme;

(b) the total CPM emissions as reported and confirmed under the emissions trading system, provided that the conditions laid down in Article 13(3), points (a) or (b), have been met;

(c) evidence consisting of:

(1) official records of compliance units surrendered in the registry or other relevant records from authorities responsible for managing the emissions trading system showing the number of compliance units surrendered to cover the reported and confirmed CPM emissions;

(2) where the certification report is issued before the deadline for surrendering compliance units prescribed in national legislation applicable at the time of entry into force of this Regulation, evidence confirming the total CPM emissions referred to in point (b) are still valid and the conditions laid down in Article 13(3) points (a) or (b) have been met;

Where the average exchange price of allowance on the recognised secondary market is used to determine the total carbon price paid by the operator under an emissions trading system, evidence of the carbon price in the relevant reporting period shall include all of the following information:

(a) evidence of the published average exchange price of allowance used in accordance with section 3.3.1;

(b) evidence as referred to in the first subparagraph, points (b) and (c), of this section.

Where a fixed rate against which allowances can be purchased is used by the operator under an emissions trading system, evidence of the carbon price paid in the relevant reporting period shall include all of the following:

(a) legislation that prescribes the fixed rate, applicable at the time of reporting carbon price data, against which allowances can be purchased;

(b) the proof of purchase, including the purchase date, number of allowances purchased and total purchase price for the number of allowances;

Where the total carbon price paid by the operator in an emissions trading system is based on the average cost price of compliance units purchased, the evidence shall include:

(a) official records of the number of compliance units surrendered in the registry or other relevant records from authorities responsible for managing the emissions trading system to cover the reported and confirmed CPM emissions;

(b) evidence of the quantity of compliance units in the account of the emissions trading system’s registry at the end of the reporting period used for reporting embedded emissions, the date of purchase and the purchased price for those compliance units;

(c) evidence that the compliance units referred to in point (b) are still valid at the end of the reporting period used for reporting embedded emissions;

(d) the total CPM emissions as reported and confirmed under the emissions trading system provided that the conditions laid down in Article 13(3), points (a) or (b), have been met.

Where the rules of an emissions trading system require an operator to partially surrender allowances every year and surrender the balance of the full allowances to match all reported and confirmed emissions in the final year of a multi-year compliance cycle, evidence of carbon price paid shall include:

(a) where the reporting period covers the CPM reporting period in which there was a partial surrender of allowances, the evidence referred to in the first subparagraph, is applicable to the partially surrendered allowances for those reporting periods;

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(b) where the reporting period covers the final year in which the balance of full allowances was surrendered to match reported and confirmed emissions the evidence referred to in the first subparagraph, is applicable the fully surrendered allowances in that final year of the multi-year compliance cycle.

For the purposes of determining the carbon price paid in the reporting periods in which allowances were surrendered partially, only the carbon price related to the partially surrendered allowances shall be taken into account.

3.5.2. Carbon tax

Where the carbon price relates to a carbon tax, evidence in the relevant reporting period shall include all of the following information:

(a) the legislation prescribing the applicable carbon tax rate or, if applicable, the reduced carbon tax rate at the time of reporting carbon price data, including possible modifications during the reporting period;

(b) where the carbon tax is a point source carbon tax applied to direct emissions:

(1) official records of the tax paid on the quantity of emissions, including evidence obtained from the tax authorities;

(2) evidence of CPM emissions confirmed and reported under the carbon tax provided the conditions laid down in Article 13(3), point (b), have been met;

(c) where the carbon tax is levied on a fuel (fuel-based carbon tax):

(1) official records of the tax paid on the quantity of fuel, including evidence from fuel suppliers or evidence obtained from the tax authorities responsible for the carbon tax;

(2) evidence of fuel consumed reported and confirmed under the carbon tax provided that the conditions laid down in Article 13(3), point (b), are met.

(3) evidence that emission factors used in equation 3 are consistent with the emission factors referred to in section 3.3.3.

3.5.3. Refund

Where the rebates or other forms of compensation takes the form of a refund pursuant to section 3.4, the evidence shall include the following information:

(a) official correspondence with the authority responsible for granting the refunds, including applications for ex-post refunds and the authority’s approval of those application;

(b) official confirmation of when the refund was received or will be granted;

(c) official confirmation of the amount of direct refund received or ex-post refund that is due to be received;

(d) where available, record of payment of the direct refund to the operator by the authority responsible for granting the refunds, including financial accounting records.

(e) where the carbon price is levied on electricity, the electricity bill with the stated credit or payment reduction;

(f) where the rebates or other forms of compensation have a monetary value that needs to be accounted for in annual financial accounts or balance sheets, statements from qualified financial auditors or formal financial management reports.

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3.5.4. Carbon credits

Where the carbon price is partially paid using carbon credits, evidence of carbon credits used in the relevant reporting period shall include all of the following information:

(a) official records of the number of carbon credits surrendered in the registry or other relevant records from authorities responsible for managing the emissions trading system or carbon tax to cover the reported and confirmed CPM emissions that are used as a parameter for establishing the carbon price effectively paid in accordance with section 3.3.4;

(b) official record of the total emissions confirmed and reported under the carbon price mechanism including for which part of those emissions carbon credits were used to meet the compliance obligations under the emissions trading system or carbon tax;

(c) evidence of the purchased quantity of carbon credits, date of purchase and the purchased price for these carbon credits;

(d) where international carbon credits are used, all of the following conditions are met;

(1) the following evidence is provided:

(1) evidence that the carbon credits are first transferred as Internationally Transferred Mitigation Outcomes in accordance with Article 6.2 of the Paris Agreement following their registration on the Centralized Accounting and Reporting Platform (CARP) established by the United Nations Framework Convention on Climate Change ('UNFCCC');

(2) evidence that no significant outstanding inconsistencies were identified in the last technical expert review report of the last initial report or updated initial report for the relevant cooperative approach under available on the CARP; or

(3) evidence is provided that credits are issued under Article 6.4 of the Paris Agreement based on their registration in the UNFCCC Mechanism registry as Emission Reductions authorised for international transfer under Article 6.4 of the Paris Agreement;

(2) evidence is provided that the share of international carbon credits as referred to in point 1) does not exceed 10% of the reported and confirmed emissions of the installation covered by the third-country carbon price mechanism emissions that are used for establishing the carbon price effectively paid in accordance with section 3.3.4.

4. ATTRIBUTION OF THE CPM EMISSIONS TO GOODS

The CPM emissions shall be attributed to each good in line with Article 4. Annex I and III to Implementing Regulation (EU) 2025/2547 by carrying out the activities in sections 4.1 and 4.2.

The total CPM emissions of an installation producing goods shall be taken as reported and confirmed under the requirements of the jurisdiction of the carbon price mechanism, provided that the conditions set out in Article 13(3) are met.

By way of derogation from the second subparagraph, where the carbon pricing mechanism is a fuel-based carbon tax, the total CPM emissions are derived by using:

(a) the following equation where the CPM emissions are associated with direct emissions:

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$$EM_CPM_{DIR} = \sum_{f=1}^{n} \left(Q_{FUEL\ f} \times DEF_f \right) \quad \textit{(equation 7a)}$$

(b) the following equation where the CPM emissions are associated with indirect emissions:

$$EM_CPM_{IND} = \sum_{f=1}^{n} \left(Q_{FUEL\ f} \times DEF_f \right) \quad \textit{(equation 7b)}$$

Where:

– EM_CPM_{DIR} is the total CPM emissions of the installation under an individual carbon price mechanism associated with direct emissions, expressed as tonnes CO_2e;

– EM_CPM_{IND} is the total CPM emissions of the installation under an individual carbon price mechanism associated with indirect emissions, expressed as tonnes CO_2e;

– Q_{FUELf} is the quantity of the fuel *f* that has been consumed at the installation in the CPM reporting period and that is subject to a carbon price, expressed in units of fuel;

– DEF_f is the default emissions factor relevant for the fuel *f* consumed, expressed in tonnes CO_2e/unit of fuel;

– $\Sigma_{f=1}^{n}$ is the sum of the emissions attributable to the different fuels subject to the specific carbon tax.

The default emissions factor in equation 7a and 7b shall be consistent with the default emissions factor used in equation 3a and 3b and the rules applicable to that emission factor in section 3.3.3.

Where CPM emissions relate to precursors produced outside the installation that are used in the production of a good, the steps set out in sections 4.1 and 4.2 shall be carried out.

4.1. Attribution of the CPM emissions within the reporting period

The total quantity of CPM emissions shall be split into those emissions that fall within the reporting period and those emissions that fall outside that reporting period by using:

(a) the following equation where the emissions are associated with direct emissions:

$$EM_{DIR} = EM_CPM_{DIR} - EM_{nRP_DIR} \quad \textit{(equation 8a)}$$

(b) the following equation where the emissions are associated with indirect emissions:

$$EM_{IND} = EM_CPM_{IND} - EM_{nRP_IND} \quad \textit{(equation 8b)}$$

Where:

– EM_{DIR} is the total direct emissions of the installation that fall within the reporting period, expressed as tonnes of CO_2e;

– EM_{IND} is the total indirect emissions of the installation that fall within the reporting period, expressed as tonnes of CO_2e;

– EM_CPM_{DIR} is the total CPM emissions of the installation associated with direct emissions, expressed in tonnes of CO_2e;

– EM_CPM_{IND} is the total CPM emissions of the installation associated with indirect emissions, expressed in tonnes of CO_2e;

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– EM_{nRP_DIR} is the total direct emissions of the installation that do not fall within the reporting period, expressed in tonnes of CO_2e;

– EM_{nRP_IND} is the total indirect emissions of the installation that do not fall within the reporting period, expressed in tonnes of CO_2e.

The reference year used for determining whether CPM emissions fall within the reporting period used for reporting embedded emissions shall be the reporting period referred to in the emissions report verified by the verifier in accordance with Annex II, section 2 of Delegated Regulation (EU) 2025/2551.

Where the CPM reporting period is not the same as the reporting period used for reporting embedded emissions, the operator shall use the relevant data on CPM emission from two consecutive CPM reporting periods, and attribute these data to the reporting period that is used for reporting embedded emissions in accordance with Article 7 of Implementing Regulation (EU) 2025/2547, based on at least monthly reporting.

4.2. Attribution of the total emissions within the reporting period to each good

The total direct emissions and the total indirect emissions covered by the carbon price mechanism and within the reporting period (EM_{DIR} *or* EM_{IND}) shall be attributed separately to each good at CN code level following the same steps as when attributing embedded emissions to each good in accordance with Article 4 of and Annex I to Implementing Regulation (EU) 2025/2547. That attribution shall consist of the following steps:

(a) EM_{DIR} *or* EM_{IND} shall be attributed to the system boundaries of production processes of each good in accordance with Article 4 of and Annex I to Implementing Regulation (EU) 2025/2547;

(b) direct and indirect emissions shall be attributed separately for each CN code of the good in accordance with Annex I in conjunction with Annex III to Implementing Regulation (EU) 2025/2547.

When attributing the total indirect emissions covered by the carbon price mechanism to each good, the goods listed in Annex II of Regulation (EU) 2023/956 shall not be taken into account.

By way of derogation from the obligation set out in point (a), when 5% or less of the total CPM emissions are not covered by the boundaries of direct or indirect emissions of the installation, all of the total CPM emissions (EM_{DIR} *or* EM_{IND}) may be attributed to each good to which the functional unit applies (under point (b).

For the purpose of point (b), the attributed direct and indirect emissions shall be expressed in functional units for each CN code in accordance with Article 4 of Implementing Regulation (EU) 2025/2547.

The direct and indirect emissions within the reporting period that are expressed in functional units shall be attributed separately to the quantity of production of each tonne of good for each CN code as specified in Annex I to Implementing Regulation (EU) 2025/2547, using:

(a) the following equation where the emissions are associated with direct emissions:

$$EM_{DIR_g} = EM_{DIR_FU_g} / FUF_g \qquad \textit{(equation 9a)}$$

(b) the following equation where the emissions are associated with indirect emissions:

$$EM_{IND_g} = EM_{IND_FU_g} / FUF_g \qquad \textit{(equation 9b)}$$

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Where:

– EM_{DIRg} is the total direct emissions within the reporting period attributed to the quantity of production of good *g*, expressed in tonnes of CO_2e per tonne of good;

– EM_{INDg} is the total indirect emissions within the reporting period attributed to the quantity of production of good *g*, expressed in tonnes of CO_2e per tonne of good;

– EM_{DIR_FUg} is the total direct emissions within the reporting period, attributed to the quantity of production, expressed in the functional unit for each good *g* in accordance with Article 4 of Implementing Regulation (EU) 2025/2547;

– EM_{IND_FUg} is the total indirect emissions within the reporting period, attributed to the quantity of production, expressed in the functional unit for each CN code in accordance with Article 4 of Implementing Regulation (EU) 2025/2547;

– *FUF* is the functional unit factor applicable to each good *g* for the purpose of determining the proportion of functional unit per tonne of goods, as specified in Article 4 of Implementing Regulation (EU) 2025/2547;

Where the functional unit is a tonne of good, the functional unit factor is 1. Where the installation only produces electricity as a good laid down in Annex I of Regulation (EU) 2023/956, the functional unit is 1. The operator shall convert the functional unit of the electricity into MWh.

Where the functional unit of goods as referred to in Article 4(5) of Implementing Regulation (EU) 2025/2547 are tonnes of clinker content and where the functional unit of fertilisers as referred to in Article 4(4) of that Regulation are tonnes of nitrogen content or the supplementary unit kg of nitrogen content and where those goods are commercialised in different ranges of composition, the direct or indirect emissions within the reporting period shall be attributed separately to each range of composition, or specific composition, in accordance with section B of Annex III to that Regulation. In that case the functional unit factor shall take into account the proportion of clinker content in the good as referred to in Article 4(5) of that Regulation and the different proportions of nitrogen content in the good as referred to in Article 4(4) of that Regulation.

4.3. Evidence of the applicable reporting period and of the attribution to goods

Where the CPM reporting period is not the same as the reporting period used for reporting embedded emissions in accordance with Article 7 of Implementing Regulation (EU) 2025/2547, evidence shall consist of data on CPM emissions, from at least monthly reporting, taken from the dataset for two consecutive CPM reporting periods attributed to the reporting period that is used for reporting embedded emissions in accordance with Article 7 of that Regulation.

Evidence of the attribution of CPM emissions associated with direct and indirect emissions to the CN code of each good as specified in Annex I to Implementing Regulation (EU) 2025/2547, as well as to the functional unit for each CN Code and to the quantity of production to each CN code of the good shall be consistent with the attribution in accordance with Annexes I and III to that Regulation, and shall include the following:

(a) evidence in the carbon price documentation that the attribution of carbon price data to each good is in line with the approach for attributing embedded emissions in the emissions report verified by the verifier in accordance Annex II, section 2 of Delegated Regulation (EU) 2025/2551;

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(b) relevant internal records to allow for the plausibility checks on reliability of data listed in Article 12;

(c) when the attribution relates to precursors produced outside the installation and where Article 13(2) applies, the certified operator's carbon price report and the corresponding certification report of the installation that produced the precursors.

5. ATTRIBUTION OF REBATES OR OTHER FORMS OF COMPENSATION ON EMISSIONS TO GOODS

For each carbon price mechanism, the quantity of emissions related to rebates or other forms of compensation on emissions shall be determined in accordance with sections 5.1 and 5.2. The emissions related to such rebates or other forms of compensation shall include:

(a) emissions associated with free allowances that are received by the operator and for which no carbon price has been paid;

(b) emissions that are below an emission intensity baseline that are exempted from payment of a carbon price under a baseline-and-credit emission trading system;

(c) emissions that are below a threshold under which no carbon price is due;

(d) emissions that are exempted from payment of a carbon price for reasons other than those referred to in points (a) to (c).

5.1. Determination of the quantity of rebate or other form of compensation on emissions applicable to the reporting period

For each carbon price mechanism, the quantity of the emissions associated with rebates or other forms of compensation, as referred to in the first subparagraph of section 5, shall be split into those emissions associated with rebates and other forms of compensation that are within the reporting period that is used for reporting embedded emissions and those emissions that are outside of that reporting period. For that purpose:

(a) the following equation is used where the emissions are associated with direct emissions:

$$\boldsymbol{Rebated_EM_{DIR} = Rebated_EM_CPM_{DIR} - Rebated_EM_{nRP_DIR}} \quad \textit{(equation 10a)}$$

(b) the following equation is used where the emissions are associated with indirect emissions:

$$\boldsymbol{Rebated_EM_{IND} = Rebated_EM_CPM_{IND} - Rebated_EM_{nRP_IND}} \quad \textit{(equation 10b)}$$

Where:

– $Rebated_EM_{DIR}$ is the direct emissions associated with rebates or other forms of compensation that fall within the reporting period expressed in tonnes of CO_2e;

– $Rebated_EM_{IND}$ is the indirect emissions associated with rebates or other forms of compensation that fall within the reporting period expressed in tonnes of CO_2e;

– $Rebated_EM_CPM_{IND}$ is the total CPM emissions of the installation that are associated with rebates and other forms of compensation, expressed in tonnes of CO_2e;

– $Rebated_EM_CPM_{nRP_DIR}$ is the direct emissions associated with rebates or other forms of compensation that do not fall within the reporting period, expressed in tonnes of CO_2e;

– *Rebated_EM$_{nRP_IND}$* is the indirect emissions associated with rebates or other forms of compensation that do not fall within the reporting period, expressed in tonnes of CO_2e.

The operator shall attribute emissions associated with rebates and other forms of compensation from two consecutive CPM reporting periods in the same proportions as emissions are attributed under section 4.1 in order to match the reporting period that is used for reporting embedded emissions.

5.2. Attribution of rebates or other forms of compensation on emissions to each good

The direct and indirect rebates or other forms of compensation on emissions as determined in accordance with section 5.1 shall be attributed separately to each good at CN code level following the same steps as for attributing embedded emissions to each good in accordance with Article 4 and Annex I of Implementing Regulation (EU) 2025/2547. That attribution shall consist of the following steps:

(a) *Rebated_EM$_{DIR}$* and *Rebated_EM$_{IND}$* shall be attributed to the system boundaries of production processes of each good in accordance with Article 4 of and Annex I to Implementing Regulation (EU) 2025/2547;

(b) the proportion of rebates or other forms of compensation on emissions (*Rebated_EM$_{DIR}$* and *Rebated_EM$_{IND}$*) shall be attributed to each CN code of the good in accordance with Annex I in conjunction with Annex III to Implementing Regulation (EU) 2025/2547.

When attributing the indirect rebates or other forms of compensation on emissions to each good, the goods listed in Annex II of Regulation (EU) 2023/956 shall not be taken into account.

For the purpose of point (b), the attributed rebates or other forms of compensation on emissions shall be expressed in functional units for each CN code in accordance with Article 4 of Implementing Regulation (EU) 2025/2547.

The rebates or other forms of compensation on emissions within the reporting period that are expressed in functional units shall be attributed to the quantity of production of each tonne of good for each CN code as specified in Annex I to Implementing Regulation (EU) 2025/2547, using:

(a) the following equation for emissions associated with direct emissions:

$$\boldsymbol{Rebated_EM_{DIRg} = Rebated_EM_{FU_DIR_g} / FUF_g} \qquad \textit{(equation 11a)}$$

(b) the following equation for emissions associated with direct emissions:

$$\boldsymbol{Rebated_EM_{INDg} = Rebated_EM_{FU_IND_g} / FUF_g} \qquad \textit{(equation 11b)}$$

Where:

– *Rebated_EM$_{DIRg}$* is the rebates or other forms of compensation on direct emissions within the reporting period attributed to the quantity of production of each tonne of good per CN code, expressed in tonne of CO_2e;

– *Rebated_EM$_{INDg}$* is the rebates or other forms of compensation on indirect emissions within the reporting period attributed to the quantity of production of each tonne of good per CN code, expressed in tonne of CO_2e;

– *Rebated_EM$_{FU_DIRg}$* is the rebates or other forms of compensation on direct emissions within the reporting period, attributed to the quantity of production, expressed in the

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functional unit for each CN code in accordance with Article 4 of Implementing Regulation (EU) 2025/2547;

– *Rebated_EM$_{FU_INDg}$* is the rebates or other forms of compensation on indirect emissions within the reporting period, attributed to the quantity of production, expressed in the functional unit for each CN code in accordance with Article 4 of Implementing Regulation (EU) 2025/2547;

– *FUF* is the functional unit factor applicable to each good for the purposes of determining the proportion of functional unit per tonne of goods, as specified in Article 4 of Implementing Regulation (EU) 2025/2547.

Where the functional unit is a tonne of good, the functional unit factor is 1.

Where the functional units of goods as referred to in Article 4(5) of Implementing Regulation (EU) 2025/2547 are tonnes of clinker content and where the functional units of fertilisers as referred to in Article 4(4) of that Regulation are tonnes of nitrogen content or the supplementary unit kg of nitrogen content and these goods are commercialised in different ranges of composition, the direct or indirect rebates or other forms of compensation on emissions within the reporting period shall be attributed separately to each range of composition, or specific composition, in accordance with section B of Annex III to that Regulation. In that case, the functional unit factor shall take into account the proportion of clinker content in the good as referred to in Article 4(5) of that Regulation and the different proportions of nitrogen content in the good as referred to in Article 4(4) of that Regulation.

5.3. Evidence of rebates or other forms of compensation on emissions

The operator shall provide the independent person with at least the following evidence of rebates or other forms of compensation:

(a) where the rebates or other forms of compensation consists in free allowances:

  (1) the applications for free allowances submitted by the operator to the authority responsible for issuing allowances and official decisions of those authorities approving the issuance of free allowances to the operator;

  (2) certificates of compliance or other relevant documents showing the amount of free allowances granted by the regulator to the installation within a given period or free allocation tables published by the regulator that show the amount of free allowances granted to an installation;

  (3) evidence of the date of issuance of free allowances, including, if relevant, correspondence with the authority responsible for granting allowances.

(a) where the rebates or other forms of compensation consists of emissions that lie below an emission intensity baseline and are exempted from payment of a carbon price:

  (1) applicable legislation which sets the reduction of the baseline under the carbon price mechanism;

  (2) a letter or a statement from the authority responsible for the rebates or other forms of compensation confirming the amount of emissions below the baseline and the rebates or other form of compensation granted to the operator as well as the their quantity and application period;

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(b) where the rebates or other forms of compensation are emissions exempted from payment of a carbon price because of other reasons as referred to in point (c) in)the first subparagraph of section 5:

(1) applicable legislation which lays down the specific exemption from payment of carbon price under the carbon price mechanism;

(2) a letter or a statement from the authority responsible for the rebates or other forms of compensation, indicating the quantity of rebates or other forms of compensation granted to the operator and their application period.

6. ATTRIBUTION OF THE CARBON PRICE EFFECTIVELY PAID FOR SPECIFIC EMBEDDED EMISSIONS IN EACH GOOD

For each individual carbon price mechanism, the carbon price effectively paid shall be attributed to the following specific embedded emissions in accordance with section 6.1:

(a) the total direct emissions within the reporting period attributed in accordance with section 4.2 to the quantity of production of each tonne of good per CN code, expressed in tonnes of CO_2e per tonne of good or per MWh;

(b) the total indirect emissions within the reporting period attributed in accordance with section 4.2 to the quantity of production of each tonne of good per CN code, expressed in tonnes of CO_2e per tonne of good;

(c) the emissions as referred to in points (a) and (b) related to precursors produced outside the installation in accordance with sections 6.2 and 6.3.

6.1. Determination of the carbon price effectively paid on specific embedded emissions related to goods

The carbon price effectively paid shall be attributed to the quantity of each tonne of good by using:

(a) the following equation where the carbon price effectively paid relates to direct emissions:

$$\boldsymbol{EFF_CP_{DIR_g}} = \left(\boldsymbol{EM_{DIR_g}} - \boldsymbol{Rebated_EM_{DIR_g}}\right) \times \boldsymbol{EFF_CP_{DIR}} \quad \textit{(equation 12a)}$$

(b) the following equation where the carbon price effectively paid relates to indirect emissions:

$$\boldsymbol{EFF_CP_{IND_g}} = \left(\boldsymbol{EM_{IND_g}} - \boldsymbol{Rebated_EM_{IND_g}}\right) \times \boldsymbol{EFF_CP_{IND}} \quad \textit{(equation 12b)}$$

Where:

– EFF_CP_{DIRg} is the total carbon price effectively paid on specific embedded emissions (direct emissions), expressed in price per tonne of good;

– EFF_CP_{INDg} is the total carbon price effectively paid on specific embedded emissions (indirect emissions), expressed in price per tonne of good;

– EM_{DIRg} is the total direct emissions within the reporting period attributed to the quantity of production of each tonne of good per CN code, in accordance with section 4, expressed in tonne of CO_2e per tonne of good;

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– EM_{INDg} the total indirect emissions within the reporting period attributed to the quantity of production of each tonne of good per CN code, in accordance with section 4, expressed in tonnes of CO_2e per tonne of good;

– EFF_CP_{DIR} is the effective carbon price paid per tonne of CPM emissions covered by direct emissions, as determined in accordance with section 3.4;

– EFF_CP_{DIR} is the effective carbon price paid per tonne of CPM emissions covered by indirect emissions, as determined in accordance with section 3.4;

– $Rebated_EM_{DIRg}$ is the rebate or other forms of compensation on direct emissions within the reporting period attributed to the quantity of production of each tonne of good per CN code, expressed in tonne of CO_2e;

– $Rebated_EM_{INDg}$ is the rebate or other forms of compensation on indirect emissions within the reporting period attributed to the quantity of production of each tonne of good per CN code, expressed in tonne of CO_2e.

Where the installation only produces electricity as a good specified in Annex I of Regulation (EU) 2023/956, $EM_{DIR\,g}$ is expressed in tonne of CO_2e per MWh.

6.2. Determination of the carbon price effectively paid on CPM emissions attributed to precursors produced outside the installation

Where a certification report was established for the certification of the carbon price effectively paid on the specific embedded emissions of the precursor in accordance with Article 13(2), the operator producing the goods shall use the certified carbon price effectively paid for each precursor included in this certified operator's carbon price report, provided the conditions in Article 13(2) are met.

By way of derogation from the first subparagraph, the operator may use the relevant default carbon price for the specific embedded emissions of the precursor produced outside the installation.

Where an installation producing complex goods used precursors from different suppliers, a weighted average effective carbon price shall be determined using:

(a) the following formula where the carbon price relates to direct emissions:

$$Avg\left(€EFF_CP_{DIR_p}\right) = \frac{\Sigma_{i=1}^{n}\left(Q_{p,i} \times €EFF_CP_{DIR_{p,i}}\right)}{\Sigma_{i=1}^{n}\left(Q_{p,i}\right)} \quad \textit{(equation 13a)}$$

(b) the following formula where the carbon price relates to indirect emissions:

$$Avg\left(€EFF_CP_{IND_p}\right) = \frac{\Sigma_{i=1}^{n}\left(Q_{p,i} \times €EFF_CP_{IND_{p,i}}\right)}{\Sigma_{i=1}^{n}\left(Q_{p,i}\right)} \textit{(equation 13b)}$$

Where:

– $€EFF_CP_{DIR_{p,i}}$ is the carbon price effectively paid on specific embedded emissions (direct emissions) of a precursor p of the same type purchased from an individual supplier *i,* expressed in price (euro) per tonne of precursor;

– $€EFF_CP_{IND_{p,i}}$ is the carbon price effectively paid on specific embedded emissions (indirect emissions) of a precursor p of the same type purchased from an individual supplier *i,* expressed in price (euro) per tonne of precursor;

– $Avg(€EFF_CP_{DIR_p})$ is the weighted average carbon price effectively paid on direct emissions of all precursors of the same type p from all different suppliers to the installation producing the complex good, expressed in price (euro) per tonne of precursor produced outside the installation;

$Avg(€EFF_CP_{IND_p})$ is the weighted average carbon price effectively paid on indirect emissions of all precursors of the same type from all different suppliers to the installation producing the complex good, expressed in price (euro) per tonne of precursor produced outside the installation;

– $Q_{p,i}$ is the quantity of the same type of precursor p consumed purchased from supplier *i;*

– $\Sigma_{i=1}^{n}$ is the number of suppliers *i* of a precursor from the same type from 1 to *n.*

The quantity of the same type precursor produced by different suppliers ($Q_{p,i}$) used in the production of the complex good shall be consistent with the quantity reported for the calculation of the embedded emissions of that good in the emission report referred to in Regulation (EU) 2025/2547.

6.3. Determination of the carbon price effectively paid on precursors produced outside the installation

The carbon price effectively paid on precursors produced outside the installation shall be attributed to the quantity of each good by using:

(a) the following equation where the carbon price relates to direct emissions:

$$\boldsymbol{EFF_CP_{DIR_PRE_g}} = \boldsymbol{\Sigma_{p=1}^{n}\left(Q_p \times Avg(€EFF_CP_{DIR_p})/Q_{TOT_g}\right)} \textit{ (equation 14a)}$$

(b) the following equation where the carbon price relates to indirect emissions:

$$\boldsymbol{EFF_CP_{IND_PRE_g}} = \boldsymbol{\Sigma_{p=1}^{n}\left(Q_p \times Avg(€EFF_CP_{IND_p})/Q_{TOT_g}\right)} \textit{ (equation 14b)}$$

Where:

– EFF_CP_{DIRp} is the total carbon price effectively paid on the specific embedded emissions (direct emissions) of a precursor *p* produced outside the installation and consumed in the production of each good, expressed in price (euro) per tonne of good;

– EFF_CP_{INDp} is the total carbon price effectively paid on the specific embedded emissions (indirect emissions) of a precursor *p* produced outside the installation and consumed in the production of each good, expressed in price (euro) per tonne of good;

– Q_p is the total quantity of precursor *p* consumed in the production process of the good in the reporting period, as specified in the verified operator's emissions report in accordance with section 1 of Annex IV to Implementing Regulation (EU) 2025/2547, expressed in tonne of precursor;

– $Avg(EFF_CP_{DIR_PREg})$ is the weighted average carbon price effectively paid on direct emissions of all precursors of the same type from all different suppliers to the installation producing the complex good *g*, expressed in price per tonne of precursor;

– *Avg(EFF_CP$_{IND_PREg}$)* is the weighted average carbon price effectively paid on indirect emissions of all precursors of the same type from all different suppliers to the installation producing the complex good *g*, expressed in price per tonne of precursor;

– Q_{TOTg} is the total production of each good of the installation within the reporting period as specified in the verified operator's emissions report in accordance with section 1, point 34, subpoint (a), of Annex IV to Implementing Regulation (EU) 2025/2547.

7. CONVERSION TO EUROS AND AGGREGATION OF TOTAL CARBON PRICE EFFECTIVELY PAID

The total carbon price effectively paid on specific embedded direct emissions and indirect emissions related to goods as determined in accordance with section 6.1 shall be converted into euro in accordance with section 7.1.

For each carbon price mechanism, that total carbon price converted into euro in accordance with section 7.1 shall be added to the total carbon price effectively paid on specific embedded direct emissions and indirect emissions related to precursors determined in accordance with sections 6.2 and 6.3 to determine the total carbon price effectively paid on the total specific embedded emissions of goods and precursors in accordance with section 7.2.

The total carbon price effectively paid on the total specific embedded emissions shall be subsequently aggregated to the total carbon price effectively paid under all carbon price mechanisms to which the embedded emissions of the good are subject to, in accordance with section 7.3.

7.1. Conversion of the carbon price effectively paid to euros

The carbon price determined in accordance with section 6.1 and effectively paid in the local jurisdiction currency shall be converted to euro at the annual average exchange rate in accordance with Article 5 using:

(a) the following equation where the carbon price effectively paid related to direct emissions:

$$€EFF_CP_{DIR_g} = EFF_CP_{DIR_g} \times €XR \qquad \textit{(equations 15a)}$$

(b) the following equation where the carbon price effectively paid related to indirect emissions:

$$€EFF_CP_{IND_g} = EFF_CP_{IND_g} \times €XR \qquad \textit{(equations 15b)}$$

Where:

– *€EFF_CP$_{DIRg}$* is the total carbon price effectively paid on specific direct embedded emissions related to each good *g* as determined in accordance with section 6.1, expressed as price in euro per tonne of good;

– *€EFF_CP$_{INDg}$* is the total carbon price effectively paid on specific indirect embedded emissions related to each good *g* as determined in accordance with section 6.1, expressed as price in euro per tonne of good;

– *€XR* means the yearly average exchange rate to be used to convert the local currency into euro, expressed as euro per local currency unit.

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Where the installation only produces electricity as a good specified in Annex I of Regulation (EU) 2023/956, *€EFF_CP$_{DIRg}$* is expressed as carbon price effectively paid in euro per MWh.

7.2. Aggregation of the total carbon price effectively paid on goods for all carbon price mechanisms

The total carbon price effectively paid on the total specific embedded emissions shall be determined by using the following equation:

$$€\boldsymbol{EFF_CP_g} = €\boldsymbol{EFF_CP_{DIR_g}} + €\boldsymbol{EFF_CP_{IND_g}} + €\boldsymbol{EFF_CP_{PRE_g}} \quad \textit{(equation 16)}$$

Where:

– *€EFF_CP$_g$* is the total carbon price effectively paid on the total specific embedded emissions associated with each good, covering direct, indirect and precursor emissions, expressed in price (euro) per tonne of good;

– *€EFF_CP$_{DIRg}$* is the total carbon price effectively paid in euros on the direct emissions associated with each tonne of good;

– *€EFF_CP$_{INDg}$* is the total carbon price effectively paid in euros on the indirect emissions associated with each tonne of good;

– *€EFF_CP$_{PREg}$* is the total carbon price effectively paid on the specific embedded emissions, covering both the direct and indirect emissions related to the precursor consumed in the production of each tonne of good.

7.3. Total attribution of carbon price effectively paid for the installation's specific embedded emissions that are subject to carbon price mechanisms

The total carbon price effectively paid on specific embedded emissions that are subject to all carbon price mechanisms shall be determined using the following equation:

$$(\boldsymbol{TOTAL})\ €\boldsymbol{EFF_CP_g} = \boldsymbol{\Sigma_{i=1}^{n}}\left(€\boldsymbol{EFF_CP_{g,i}}\right) \quad \textit{(equation 17)}$$

Where:

– *TOTAL €EFF_CP$_g$* is the sum of the total carbon price effectively paid in euro on each good covering all carbon price mechanisms *i* applicable to the good, expressed as euro per tonne of good.

ANNEX II – Template of the operator's carbon price report

1. IDENTIFICATION OF THE OPERATOR AND OF THE INSTALLATION

(a) unique identification number of the installation in the CBAM registry;

(b) unique identification number of the operator of the installation in the CBAM registry;

2. IDENTIFICATION OF THE OPERATOR'S CARBON PRICE REPORT

(a) unique identifier and version number of the operator's carbon price report;

(b) applicable reporting period;

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(c) unique identifiers of the verified operator's emissions report and corresponding verification report;

3. CARBON PRICE DATA

For each carbon price mechanism applying to direct emissions and to indirect emissions, separately:

(a) name of the carbon price mechanism;

(b) whether the carbon price mechanism covers direct emissions or indirect emissions;

(c) reference to the applicable legislation;

(d) the carbon price in local currency per tonnes of CO_2e:

(1) where the carbon price is based on a weighted average auctioning price, an average exchange price or a fixed rate of allowances as referred to in section 3.3.1 of Annex I, a reference to the published average auctioning price, exchange price or fixed rate;

(2) where section 3.3.2 of Annex I is applicable, the specific carbon tax rate or reduced carbon tax rate per tonne of CO2 emissions associated with direct or indirect emissions;

(3) where section 3.3.3 or section 3.3.4 of Annex I is applicable, the weighted average carbon price per tonne of CO2 emissions, associated with direct or indirect emissions;

(4) the rebate or other form of compensation rate per tonne of emissions associated with the type of refund as referred to in section 3.4 [of Annex I?];

(e) the total CPM emissions associated with direct or indirect emissions as referred to in section 3.1 and 3.2 of Annex I;

(f) where the carbon price mechanism requires that a carbon price is paid per quantity of fuel purchased or consumed, the the emission factor used to determine the CPM emissions in accordance with section 3.3.3 of Annex I;

(g) where different forms of compliance units were used to meet compliance obligations as referred to in section 3.3.4 of Annex I, the related CPM emissions with these compliance units;

(h) the approach taken to attribute the CPM emissions to the reporting period if the CPM reporting period is not the same as the reporting period used for reporting embedded emissions;

(i) the approach taken to ensure that the attribution of carbon price data to the quantity of production of each tonne of good per CN code is consistent with the approach of attributing embedded emissions in accordance with Annex II to Implementing Regulation (EU) 2025/2547;

(j) the total direct or indirect emissions within the reporting period attributed to the quantity of production of each tonne of good per CN code, expressed in tonnes of CO2e per tonne of good or MWh;

(k) the direct or indirect emissions which are exempted from the obligation to pay a carbon price in accordance with section 5 of Annex I, which are:

(1) emissions associated with free allowances that are received by the operator;

(2) emissions that are below an emission intensity baseline;

(3) emissions that are below a threshold under which no carbon price is due;

(4) other emissions that are exempted from payment of a carbon price;

(l) the direct or indirect rebate or other form of compensation on emissions within the reporting period attributed to the quantity of production of each tonne of good per CN code, expressed in tonnes of CO_2e per tonne of good or MWh;

(m) for each of the goods:

(1) the carbon price effectively paid on specific direct embedded emissions, and, if applicable, specific indirect emissions expressed in price in local currency per tonne of good or MWh;

(2) the yearly exchange rate used to convert the carbon price from the jurisdiction's local currency to euro;

(3) the year of the official yearly exchange rate used to convert the carbon price from the jurisdiction's local currency to euro;

(4) the total carbon price effectively paid on the total specific embedded emissions, including the specific direct embedded emissions, and, if applicable, specific indirect emissions, expressed in euro per tonne of goods or MWh.

4. CARBON PRICE DATA ON PRECURSORS PRODUCED OUTSIDE THE INSTALLATION

(a) For each certified carbon price applicable to a precursor that is used but not produced at the installation producing the complex goods:

(1) unique identifiers of the precursor installation's certification report;

(2) the carbon price effectively paid on each precursor as reported in the installation's certification report, expressed in euro per tonne of goods.

(b) For each default carbon price applicable to a precursor that is used but not produced at the installation producing the complex goods:

(1) the default carbon price paid on each precursor, expressed in euro per tonne of goods.

5. CARBON PRICE DATA AGGREGATED ON DIFFERENT CARBON PRICING MECHANISMS

The total carbon price effectively paid in euro per tonne of good, or per MWh, covering all carbon price mechanisms applicable to the emissions of the good.

ANNEX III – Scope of accreditation for independent persons

The scope of accreditation and groups of activities defined in this Annex shall be indicated in the accreditation certificate.

CBAM activity group No.	Scope of accreditation
LIV	Certification of the carbon price effectively paid

ANNEX IV – Template of the certification report

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1. **GENERAL IDENTIFICATION DATA**

1.1. Identification of the installation and of the operator

(a) name of the installation;

(b) unique installation identifier in the CBAM registry.

1.2. Identification of the certification report

(a) unique identifier and version number of the certification report;

(b) applicable reporting period.

1.3. Identification of the independent person

(a) name of the independent person;

(b) address where the independent person is established;

(c) where the independent person outsourced verification activities in accordance with the harmonised standard referred to in Article 9(1), address(es) of office(s) of the certification team;

(d) accreditation number of the independent person;

(e) name of the national accreditation body;

(f) country of establishment of the national accreditation body;

(g) expiration date of the accreditation;

(h) any scope of accreditation relevant for CBAM.

2. **INFORMATION ON THE CERTIFICATION**

2.1. Certification team

(a) name of the CBAM certification lead auditor and of all CBAM certification auditors and, where applicable, technical experts who are members of the certification team;

(b) number of consecutive certifications carried out by the CBAM certification lead auditor;

(c) if applicable, name of CBAM certification lead auditor, CBAM certification auditors and technical experts undertaking the site visit.

2.2. Details on physical site visits

(a) if applicable, date of the site visits and number of days spent on-site;

(b) if applicable, date, location and detailed explanation of reasons for carrying out physical site visits.

2.1. Basis of certification work

(a) objectives of the certification;

(b) scope of the certification;

(c) scope of accreditation required to perform the certification;

(d) unique identifier, date and version number of the verification report referred to in Article 13(1);

(e) criteria used to certify the operator’s carbon price report;

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(f) materiality level applied;

(g) confirmation that the independent person has checked whether the operator has been granted rebates or other forms of compensation, a description of the outcome of this assessment and whether the evidence related to rebates or other forms of compensation is given in accordance with section 5.3 of Annex I;

(h) if applicable, confirmation that no rebates or other forms of compensation as specified in Article 8 were received;

(i) confirmation that the approach for attributing CPM emissions and carbon price effectively paid to each good is consistent with the approach for attributing embedded emissions in accordance with Annex II to Implementing Regulation (EU) 2025/2547 on the calculation of embedded emissions, including any inconsistencies identified by the independent person;

(j) confirmation that evidence of actual payment of the carbon price by the operator was checked and a description of any inconsistencies identified in the assessment of the evidence that has an impact on the carbon price effectively paid;

(k) list of carbon price evidence that the independent person assessed during the certification.

2.2. Carbon price data certification

(a) total carbon price effectively paid for each good, in euro, attributed to each good, expressed in euro per tonne of good or euro per MWh;

(b) total CPM emissions attributed to each good per CN code, expressed in tCO_2e per tonne of good or tCO_2e per MWh;

(c) data supporting the certified carbon price as referred to in point (a) and (b):

(1) carbon price effectively paid for each good, in euro for direct emissions of the installation, expressed in price per tonne of good or price per MWh;

(2) carbon price effectively paid for each good, in euro for indirect emissions of the installation, expressed in price per tonne of good or price per MWh;

(3) carbon price effectively paid for each good, in euro for emissions of precursors produced outside the installation, expressed in price per tonne of good.

2.3. Certification statement

(a) the independent person’s statement indicating whether it concludes with reasonable assurance that the report is free from material misstatement and that the carbon price on the verified embedded emissions was effectively paid;

(b) information on remaining misstatements that were not corrected before the issuance of the certification report and whether they are material;

(c) information on remaining instances of non-compliance that were not corrected before the issuance of the certification report and whether they have material effect on the carbon price data;

(d) recommendations for improvement, if applicable;

(e) date and signature by an authorised person on behalf of the independent person, including his/her name.

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report on Calls for Evidence on the implementing act on the carbon price paid in third countries for the definitive phase of the CBAM

1. EXECUTIVE SUMMARY

On 28 August 2025, the European Commission launched three Calls for Evidence (CfEs) to support the preparation of the implementing acts for the definitive phase of the Carbon Border Adjustment Mechanism (CBAM). This specific consultation aimed to gather stakeholder input on technical and administrative aspects of converting foreign carbon costs into a reduction of the CBAM liability, including proof of payment, currency conversion, and eligibility of third-party certifiers.

A total of 158 responses were assessed, comprising 145 direct submissions and relevant contributions from related consultations. Respondents represented a diverse mix of companies, business associations, public authorities, NGOs, and academics, with 76% of inputs from businesses and associations. Geographically, responses were almost evenly split between EU-based stakeholders (54%) and third-country participants (46%), with significant input from China, Türkiye, and the United Kingdom. Sectoral engagement was strongest in iron and steel (36 responses), followed by electricity, aluminium, and chemicals.

Stakeholder feedback focused on these core topics:

- **Eligibility of Carbon Pricing Instruments:** Stakeholders voiced broad support for recognising robust third-country schemes such as the UK ETS and China's ETS, with calls for clear equivalence rules and exclusion of taxes or levies. Some actors in opposition called for all climate related taxes paid within their own respective countries, including carbon credits, climate related taxes or offsets, to be eligible. Many discussed whether credits under Article 6 of the Paris Agreement and voluntary offsets should count. Views diverged: some favoured broad inclusion, while others limited eligibility to government-mandated, verified credits. Concerns included additionality and double counting, with calls for only certified instruments in regulated markets.
- **Rebates, Compensations & Effective Price Paid:** Widespread consensus that rebates must not undermine CBAM objectives existed; especially EU respondents favoured strict exclusion, while some third-country stakeholders sought comprehensive deductions. A strong emphasis on aligning definitions with EU ETS principles was given, avoiding double charging, and ensuring transparency through published reference prices.
- **Proof of Payment:** Stakeholders urged practical, standardised documentation (e.g., government-issued receipts) and digital solutions to reduce administrative burden and prevent fraudulent behaviour.
- **Currency Conversion:** Calls for a transparent, standardised methodology, with clarity on applicable exchange rates and time windows were remarked.
- **Accreditation and Independence:** Widespread support for internationally inclusive standards, mutual recognition agreements, and recognition of accreditation linked to frameworks like ISO and GHG Protocol frameworks.
- **Recognition of National Systems:** Some stakeholders warned against EU-only accreditation, citing risks of trade barriers and excessive costs for non-EU manufacturers.
- **Administrative Simplicity and Digital Integration:** Strong calls for streamlined processes were voiced, as well as harmonised templates, and IT-enabled compliance.

Generally, the consultation on the inclusion of carbon pricing paid in third countries under the CBAM framework revealed strong overall support for the mechanism's objectives, but it also highlighted the complexity of translating these principles into practical rules. Stakeholders broadly agreed that the

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e grounded in clarity, **predictability, and fairness to maintain environmental integrity** while avoiding competitive distortions. At the heart of the discussion was the need for harmonisation with existing EU ETS principles. Respondents consistently stressed that any methodology for recognising foreign carbon costs should align with established standards to ensure consistency and credibility across jurisdictions.

Transparency was another cornerstone of stakeholder feedback. Respondents urged the Commission to publish clear guidance, including reference prices, and lists of recognised carbon pricing instruments to foster trust and predictability. They also called for explicit rules on rebates and compensations, warning that undisclosed subsidies could erode CBAM's environmental objectives. Diverging views between EU and non-EU participants were somewhat evident: while many EU stakeholders tended to favour stricter exclusion of rebates, several third-country respondents pressed for comprehensive deductions of carbon costs paid abroad, underscoring the need for a balanced approach that respects both fairness and competitiveness.

The consultation also underscored the importance of internationally inclusive accreditation standards. Stakeholders cautioned against limiting verification to EU-accredited bodies, arguing that such restrictions could create unnecessary trade barriers and increase compliance costs. Instead, they advocated for mutual recognition agreements and alignment with globally recognised frameworks such as ISO 14064 and the GHG Protocol. This approach was seen as essential to maintaining credibility while facilitating participation from diverse markets globally.

2. INTRODUCTION AND SCOPE OF WORK

To support the preparation of the implementing acts for the definitive phase of the CBAM, the European Commission (DG TAXUD) launched 3 CfEs[1]. Each Call focused on one of the implementing acts that will operationalise key elements of the CBAM framework:

- Implementing act on the calculation methodology – rules for determining embedded direct and indirect emissions in CBAM goods, including the use of actual values and default values.
- Implementing act on free allocation adjustment – rules for adjusting the number of CBAM certificates to be surrendered in order to reflect the gradual phase-out of free allocation under the EU ETS.
- Implementing act on carbon pricing – rules for deducting from the CBAM liability the explicit carbon price paid in a third country.

Through these CfEs, stakeholders were invited to provide feedback, information, data and evidence on the technical, practical and administrative implications of the proposed rules for these implementing acts.

2.1 Outputs of this work

The overarching objective of this Synopsis Report is to provide evidence-based input to the Commission's preparation of the implementing acts for the definitive phase of CBAM by consolidating and analysing stakeholder feedback from the 3 CfEs.

More specifically, the report aims to:

- provide an integrated overview of stakeholder feedback, organised by key topic.

[1] https://taxation-customs.ec.europa.eu/news/cbam-call-evidence-emission-methodology-free-allocation-adjustment-and-carbon-price-paid-third-2025-08-29_en

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as where stakeholder views converge or diverge, including differences between stakeholder groups and sectors.
- identify issues that may have implications for the design, implementation or administration of the three implementing acts.

2.2 Scope and stakeholders

The consultations were open to all members of the public, both within the EU and internationally. The scope of contributions included:

- comments on the design, clarity and feasibility of the methodologies set out in the CfEs;
- evidence concerning data availability, sector-specific constraints or operational challenges;
- sectoral perspectives from producers, importers, traders and associations active in CBAM-covered industries;
- views from non-EU stakeholders, including major exporting countries; and
- general commentary on the broader policy context, including issues outside the scope of the implementing acts (reported statistically only).

3. CONSULTATION METHODOLOGY

3.1 Analytical approach

The Calls for Evidence invited stakeholders to provide input through stand-alone, open-ended questions and, where relevant, attachments such as position papers. Stakeholder submissions were often extensive, heterogeneous in structure, and varied widely in the level of detail provided. The analytical approach was designed to treat this material consistently across the three CfEs and to ensure comparability between them.

Stakeholder inputs were then reviewed and mapped to a predefined set of key topics and sub-topics reflecting the structure of the Commission's CfEs. This process combined manual review with targeted keyword searches to ensure that all comments relevant to the methodology were captured, regardless of how stakeholders structured their submissions.

4. Analysis of responses to the three Calls for Evidence

4.1 Overview of respondents to the Calls for Evidence on Carbon Price Paid

Stakeholders submitted 145 responses to the CfE on carbon price paid in a third country. In addition, 5 responses to the CfE on Free Allowances and 8 responses to the CfE on Methodology included relevant input. As a result, a total of 158 stakeholder responses were assessed for this CfE. 96 responses (61%) chose to include an attachment, and 62 responses (39%) consisted of free-text input.

The stakeholder base was diverse. Companies and business associations accounted for the largest share with 76% of all responses, with 50% (79 responses) coming from companies or businesses, while business associations contributed 26% (41 responses). Public authorities submitted 8 responses, and academic and research institutions and non-governmental organisations submitted 7 responses each. 6 submissions were from EU citizens and 1 from a non-EU citizen.

When considering organisation size, large enterprises dominated the submissions, with 71 responses, or 45%, originating from organisations with more than 250 employees. Smaller organisations also featured prominently, with 48 responses from small enterprises employing between 10 and 49 people,

[redacted]es from micro-enterprises with <10 employees. Medium-sized organisations, with 50 to 249 employees, accounted for 12 responses.

Figure 1 Responses by Organisation Type

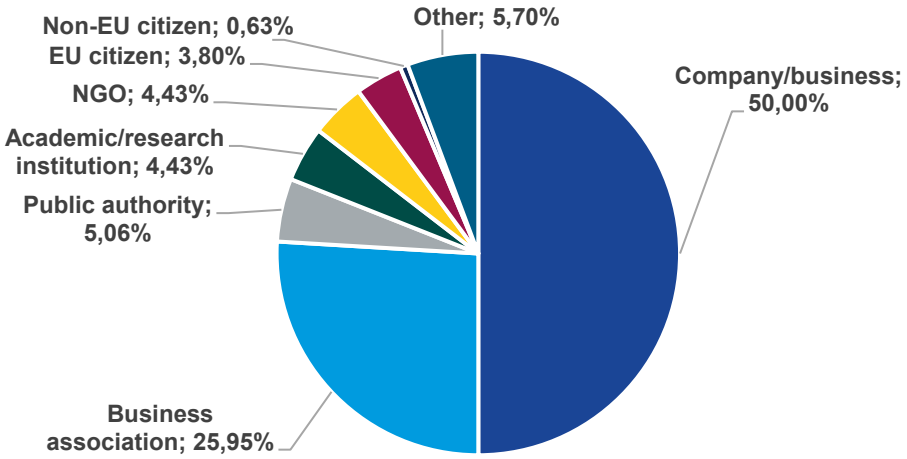
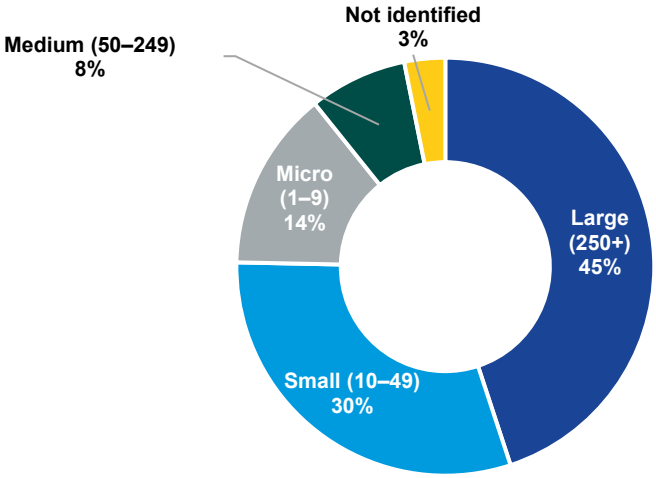


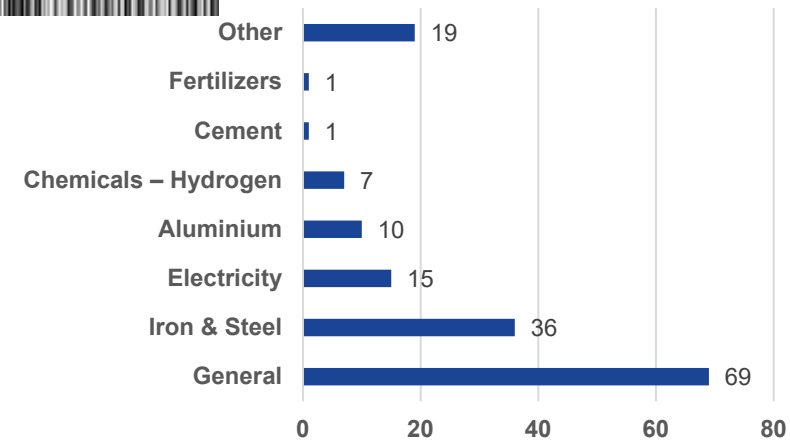
Figure 2 Responses by Organisation Size



Responses spanned a range of sectors. The largest category was general CBAM industries, meaning any other industry affected by the CBAM other than the ones further specified within this review, for example respondents from the automobile, glass, or oil/gas sectors, which accounted for 69 responses (43.7%). More specific industries amongst respondents included iron and steel with 36 responses, electricity with 15, aluminium with 10, and chemicals-hydrogen with 7. Cement and fertilisers each accounted for 1 response, while 19 submissions were from sectors which were not directly CBAM-affected industries.

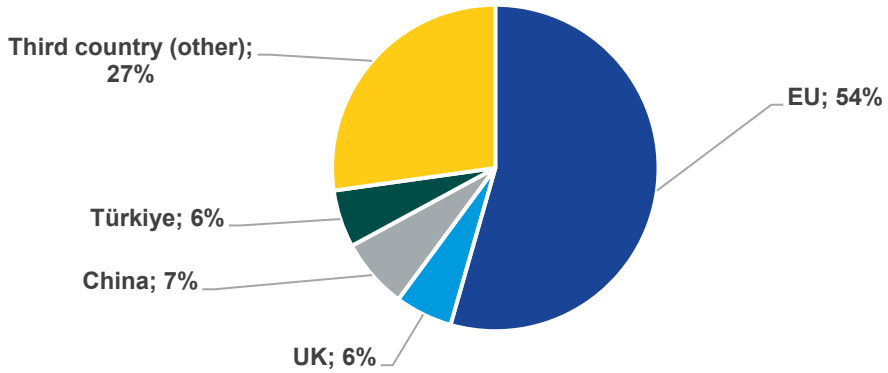
Figure 33 Number of Respondents per Sector

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Geographically, responses were almost evenly split between EU-based stakeholders and those from third countries, with 54% originating within the European Union and 46% from outside. Among non-EU respondents, the majority came from China, Türkiye and the United Kingdom.

Figure 4 4 Geographical Distribution of Respondents



4.2 Quantitative and qualitative analyses of stakeholder responses

In several instances, respondents raised points that fall outside the scope of the implementing acts under consultation. These include political positions, broader policy considerations, or issues that would require amendments to the CBAM Regulation itself or even to the EU ETS Directive. For such inputs, only statistical information was collected, namely how frequently each topic was mentioned and by which sectors, without further qualitative analysis. Examples of out-of-scope issues raised by stakeholders include:

- Concerns around competitiveness and risk of trade bilateral disputes
- Suggestions to link the UK and EU ETS, accompanied by mutual exemptions from CBAM obligations.
- Impact of CBAM on cross-border electricity trading
- Adjustment to CBAM scope

A similar statistical-only approach was applied to generic claims, such as high-level calls for reduced administrative burden, where stakeholders did not provide concrete methodological issues or actionable proposals. The detailed quantitative analysis of stakeholder inputs, together with the

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core methodological issues and the options proposed by respondents for addressing them, is presented in the following sections.

4.3 Key topic areas

9 key topic areas were identified (highlighted in table below), based on the topics of interest mentioned in the CfE by the Commission and the analysis of stakeholder responses undertaken. These were classified into 2 categories: evidencing of price paid & conversion to euro's and eligibility rules for third-party certifiers. Analysis of the summary of responses provided by topics raised by stakeholders are presented in the following sections.

Category	Key topic area
Evidencing of price paid & conversion to euro's	Eligibility of specific carbon pricing instruments
	Consistency of emissions covered by the carbon price and by the CBAM
	Determination of possible rebates in the carbon pricing instrument
	Effective price paid
	Proof of payment
	Currency conversion methodology
	Administrative burden and data integrity
Eligibility rules for third-party certifiers	Accreditation & independence
	Recognition of national verification systems

4.3.1 Issues raised by stakeholders by key topic

Eligibility of specific carbon pricing instruments

A total of **74 responses** addressed the topic of eligibility for specific carbon instruments. Companies and business associations dominated these submissions, with most adopting a neutral but broadly supportive tone. Respondents were primarily located within the European Union, notably in Germany and Belgium, while contributions also came from outside the EU, particularly from China and Türkiye. Among industry sectors, iron and steel featured most prominently, with 35 responses, followed by electricity, aluminium and chemicals (hydrogen).

Stakeholders broadly supported the CBAM approach, emphasising the need for clarity, predictability, and fairness in recognising third-country carbon pricing systems. There generally was a strong call for the recognition of foreign schemes to avoid double charging and ensure equivalence. Some respondent highlighted that not only national but also sub-national carbon tax schemes should be recognised, such as regional carbon pricing mechanisms.

Regarding the type of schemes to be recognised, the majority of respondents stressed that only genuine, explicit, and verifiable carbon costs should be recognised, cautioning against the inclusion of unrelated taxes or levies. Several stakeholders argued that the recognition of carbon pricing under CBAM should follow a cautious and conservative approach to safeguard its environmental integrity and ensure a level playing field for EU producers. They stressed that only effective, explicit and net carbon costs applying to the entire domestic production in the country of origin should be taken into

ly where the overall climate policy framework is ambitious, transparent and robust. According to these responses, carbon pricing mechanisms or taxes that are offset by direct or indirect rebates should therefore not be recognised, nor should other cost components such as energy taxation.

In addition, stakeholders emphasised that CBAM should only recognise officially regulated compliance-based carbon pricing systems, citing established emissions trading schemes as relevant benchmarks. Established schemes given as examples included the UK ETS and China's national ETS. Voluntary offsetting measures, including carbon credits from unregulated or voluntary markets, were by many considered inappropriate for CBAM purposes due to concerns over monitoring, credit quality, and the risk of double counting in the absence of a unified accounting framework. Any potential recognition of carbon credits, according to these views, should be strictly limited to solid, verifiable certifications aligned with EU standards.

In opposition, some called for a broadening of the carbon price terminology to include all climate-related costs borne under non-EU regulatory schemes and voluntary markets such as fuel and electricity taxes; as well as the recognition of instruments and certificates currently anticipated to be out of scope of the methodology, such as RECs and IRECs which were specifically mentioned by respondents from Egypt and the United Arab Emirates. One governmental representation added to this by noting that carbon-intensive products are already subject to multiple taxes and fees at different stages of production and trade and called for corresponding deductions under CBAM to prevent double taxation for all these types of taxes and levies.

Regarding the recognition of voluntary carbon markets and offsets specifically, several stakeholders advocated for the recognition of such mechanisms within CBAM where these are used as part of domestic compliance frameworks in third countries. They pointed to jurisdictions such as Singapore and South Africa where carbon tax or ETS liable entities are permitted to discharge part of their obligations through eligible offsets. A significant portion of these advocated in favour of the inclusion of Article 6 carbon credits and argued that such payments should be considered as a carbon price paid for the purposes of CBAM. Stakeholders emphasised that recognition for these schemes should be conditional on clear quality and governance criteria. They suggested that offsets should only be accepted where they are nationally regulated, form part of an official compliance regime, and rely on internationally recognised standards (such as Verra, Gold Standard, CDM or Article 6 carbon credits). Several contributions stressed the importance of applying robust quality thresholds, including requirements on additionality, permanence, accurate quantification and verification, to ensure the environmental integrity of accepted credits. Some respondents also noted that voluntary carbon markets could complement compliance mechanisms by channeling finance towards mitigation activities without directly inflating commodity prices, provided that their use is subject to clear rules and transparency.

In summary, stakeholders highlighted the significant complexity and practical obstacles associated with evaluating a diverse array of carbon pricing mechanisms across jurisdictions. They stressed that the adoption of transparent, robust, and harmonised rules is critical to maintaining the environmental integrity and operational fairness of CBAM. There was broad consensus among respondents that the implementing legislation should provide precise guidance on key aspects, including:

- Explicit identification of which national, sub-national, and regional carbon pricing schemes—and which voluntary and compliance-based offset systems—will be accepted for deduction purposes.
- Clarification on the treatment of rebates, compensations, and multiple taxes or fees paid at different stages of production and trade, especially with respect to avoiding double counting or double taxation.
- Clear eligibility criteria for recognising liabilities settled through approved offset mechanisms, (such as internationally certified carbon credits in alignment with Article 6 of the Paris

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nt and voluntary markets) quality thresholds (additionality, permanence, quantification, verification), and whether these payments qualify for CBAM deductions.

Determination of possible rebates in the carbon pricing instrument

65 responses, representing around 41% of all submissions, addressed the issue of rebates and compensations within carbon pricing instruments. Companies and business associations dominated this discussion, with most comments adopting a neutral tone but raising concerns or requesting specific additions to the CBAM framework. Positive remarks were rare and largely came from NGOs, while negative comments clustered around companies and business associations. Respondents were primarily located in the EU, notably Germany and Belgium, with significant input from third countries such as China, Türkiye and the United Kingdom. The most active sectors beyond general industry were iron and steel, electricity, aluminium and chemicals (hydrogen).

A recurring theme was the rebate mechanism itself. Stakeholders **broadly agreed that rebates, subsidies and compensations must not distort CBAM's objectives**. Stakeholders called for explicit rules and independent verification to ensure that rebates, subsidies, and exemptions are fully accounted for when calculating net carbon costs. There was a divergence in tone between EU and third-country respondents, with the former favouring stricter exclusion of rebates and the latter seeking comprehensive deductions for carbon costs paid abroad. Many called for explicit rules and independent verification to ensure that any rebates granted by third-country authorities are fully accounted for when calculating net carbon costs. Several respondents stressed that indirect and hidden rebates should also be considered, while others argued for excluding exemptions and subsidies from recognised costs to maintain fair competition. Calls for transparency were frequent, with suggestions such as: *"Develop regular country reports detailing tax regimes, subsidies, rebates and other support schemes … ensuring disguised rebates are fully accounted for."* Differences in tone emerged between EU and third-country respondents**. EU voices tended to emphasise stricter policies for the exclusion of rebates** in the calculation for determining carbon price paid. **By contrast, third-country respondents focused on ensuring comprehensive deductions for carbon costs paid abroad**, with comments such as: *"All carbon costs paid abroad must be fully deducted from CBAM charges… The deduction mechanism must be comprehensive and straightforward"*

Procedural clarity was another major concern. Respondents highlighted the need for clear processes to prove payments and claim deductions, recommending granular, ETS-like reporting and verification requirements. They also called for rules allowing aggregation of multiple instruments into one effective price and alignment of definitions and accounting methods between systems. Several stakeholders urged CBAM to also mirror EU ETS methodology, arguing that this would simplify implementation and reduce complexity. Transparency and the prevention of greenwashing were repeatedly emphasised. Respondents called for mandatory disclosure of subsidies and rebates, and standardised reporting obligations.

Effective price paid

71 responses (45% of all submissions) addressed the question of how to determine the "effective price paid". The prevailing sentiment was negative or neutral, with very few positive entries. Criticism clustered most strongly around consistency with the EU ETS in terms of the price carried by domestic and importing producers, and the robustness of reporting rules. Respondents were concentrated in the EU, particularly Germany and Belgium, but there was also substantial input from China, Türkiye and the United Kingdom, mirroring the geographical spread seen elsewhere in the consultation. Beyond general industry, the most active sectors were iron and steel (35 responses), electricity (15), aluminium (10) and chemicals–hydrogen (7).

[redacted]vided opinions on whether the definition of effective price paid should be interpreted narrowly to reduce administrative burden or more broadly to capture a fuller picture of carbon pricing in third countries. It is understood that a narrow interpretation counts only direct carbon pricing instruments like ETS and carbon taxes and their associated costs, while a broad interpretation also includes the pricing of indirect measures and offsets to reflect the full cost of carbon. Closely linked to the definition were concerns about rebates and subsidies. Respondents warned about the risk of disguised support eroding carbon prices, including the recirculation of carbon revenues back to firms. These comments echo the broader rebate discussion elsewhere in the consultation and underline the need to distinguish net, paid carbon costs from nominal prices that are offset by compensatory schemes.

Avoiding double charging was another prominent strand. Stakeholders urged the Commission to ensure that payments made in third countries are properly recognised, and that rules are sufficiently clear, and sufficiently broad, to encompass relevant taxes, duties and upstream costs. This relates to the general category of eligibility of third country carbon pricing accepted within the CBAM, with respondents generally expressing concerns regarding competitiveness and carbon leakage- risks. Several stakeholders advocated for mechanisms that would enable reciprocity, emphasizing the need to prevent double charging by establishing mutual recognition of payments in comparable carbon pricing systems. Some participants suggested that all taxes, duties, and charges should be acknowledged as evidence of a carbon price paid in a third country to maintain fairness. Others supported an outcome-based approach, proposing that recognition should be determined by the actual reduction in tonnes of CO_2 rather than by monetary value, as they believed the Commission's currency conversion could introduce distortions.

Evidence, reporting and verification requirements were seen as pivotal to credibility. Many emphasised that recognition must rest on actual costs borne, not headline or theoretical prices: To underpin consistency of the applied principles and rules over time, respondents proposed regular reference updates in the form third country carbon pricing reports. Consistence with the EU ETS was repeatedly requested. Respondents urged the Commission to align CBAM methodologies and to permit aggregation where multiple instruments contribute to the carbon price borne by a product.

Beyond the overall recurring themes, there also was special interest from the electricity sector regarding this topic of effective price paid. Concerns regarding the sector were voiced in multiple responses, stressing that electricity traded on foreign power exchanges often internalises carbon costs in market prices, yet the anonymity of transactions makes it difficult to verify which flows have incurred a carbon price. Respondents called for a sector-specific approach that reflects these market conditions and ensures proportional application of CBAM. Several proposals focused on replacing the Commission's yearly average carbon price with a daily average price published by recognised sources, such as the UK ETS settlement price on ICE, to provide accurate visibility and equal treatment for importers. Overall, stakeholders urged the Commission to clarify timelines, publish transparent reference prices, and adopt dynamic methodologies aligned with real system emissions to avoid distortions and maintain competitiveness.

Taken together, the responses on Effective Price Paid show broad support for recognising genuine, verifiable carbon costs while pressing for a definition of "effective price paid" that is workable in practice, aligned with ETS principles, resistant to greenwashing, and predictable enough to avoid trade disruption and carbon leakage.

Proof of payment

53 responses (34% of all submissions) addressed the topic of proof of payment. Proof of payment refers to the documentation importers must provide to demonstrate that a carbon price has been effectively paid in the country of origin for the goods being imported. This evidence is essential for determining whether a deduction should apply, ensuring that carbon costs are not charged twice and

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[redacted] are fair and transparent. Overall sentiment was largely neutral, with a few positive remarks from companies agreeing with the principles proposed in the CBAM legislation. Geographically, most responses came from the EU, specifically Belgium, with similar contributions from China, Denmark, and Germany. From an industry perspective, general industry had the most responses (25 responses), followed by iron and steel (13 responses), electricity (6 responses), aluminium (3 responses), and chemicals–hydrogen (3 response).

Generally, responses focused on the need for practical, credible, and harmonised proof-of-payment requirements. Stakeholders recommended clear, standardised, independent verification, and digital solutions to reduce administrative burden. The electricity sector presented unique challenges, with calls for sector-specific approaches given the anonymity of power exchanges.

A central theme across stakeholder responses concerned the clarity and credibility of proof-of-payment requirements, specifically regarding what constitutes acceptable evidence that a carbon price has been paid in the country of origin. Respondents emphasised that documentation requirements should be practical and some proposed that acceptable evidence should include utility bills, government-issued receipts, and recognised certificates. Several stakeholders cautioned that overly complex evidence standards would increase administrative burden without improving accuracy, particularly for firms with large and diverse supplier networks. To ensure consistency and reduce uncertainty, some respondents recommended a detailed and binding list of supporting documents that importers and exporters can reliably follow. Additionally, stakeholders highlighted the importance of independent verification and international alignment, arguing that explicit standards must be set for the type of documentation, certification, and independent verification required, and that alignment with internationally recognised verification standards would enhance credibility and reduce the risk of fraud. Others stressed that proof of payment issued by an official authority in a third country should be directly recognised, noting that government-issued documents already carry high authenticity and should not require redundant certification by another third-party body. Where third-party verification remains necessary, respondents urged the Commission to clearly define the qualifications and role of the independent person to avoid ambiguity and ensure uniform application across Member States. Collectively, these responses underscore that a robust proof-of-payment framework requires both rigorous verification and clarity on acceptable evidence, providing confidence in CBAM deductions while safeguarding fair competition.

Many respondents emphasised the need to simplify the proof of payment process to reduce administrative complexity, particularly for SMEs and supply chains involving multiple upstream suppliers. Stakeholders called for streamlining verification procedure, utilising digital tools and harmonised templates and recommended that importers submit certified emissions values rather than extensive raw technical documentation, noting that this flexibility would greatly reduce administrative burden and enhance practicality. Several stakeholders cautioned that current requirements risk becoming unmanageable in complex supply chains, arguing that individual proof of each combination of CN code, country of origin and supplier would entail a disproportionate additional burden. To address this, they proposed that one proof per supplier should be sufficient, with documentation uploaded once to the CBAM portal and reused for subsequent declarations. Collectively, these responses highlight a preference for a digital, proportionate, and user-friendly proof of payment system that minimises administrative workload while preserving traceability and ensuring compliance with CBAM obligations.

Building on the discussion of simplification, some respondents underscored that simplifying proof of payment requirements is substantially more complex in the electricity sector because of the distinctive characteristics of electricity markets. As electricity is traded anonymously and repeatedly, a few stakeholders observed that demonstrating that the carbon price paid on exported volumes paid is challenging. This is attributed to the challenges to trace electricity once transmitted into the grid, making it indistinguishable in wholesale markets to differentiate renewable from fossil-based generation. In view of these structural limitations, several stakeholders argued that no physical proof of carbon price payment should be required by electricity importers if the third country has a recognised and enforced carbon-pricing mechanism.

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Consistency of emissions covered by the carbon price and by the CBAM

23 responses (15% of all submissions) addressed how to assess the consistency between emissions covered by the carbon price and those under the CBAM. The overall sentiment was predominantly neutral to negative, mainly from companies and business associations, with a few positive comments from public authorities. Most respondents were based in the EU, distributed fairly evenly across Germany, Belgium, and the Netherlands, with some contributions, including but not limited to China, Australia, and the United Arab Emirates. Beyond general industry (8 responses), the most active sectors were iron and steel (7 responses), electricity (3), chemicals–hydrogen (2), and aluminium (1).

Stakeholders raised significant concern about the lack of clarity and consistency in how emissions are covered under carbon pricing systems and CBAM. Several respondents highlighted without citing specific examples, that carbon pricing schemes vary in coverage of sector and to account for this proposed that either the presumptive carbon price should only be applied to a portion of the embodied emissions, or the credit rate should be adjusted accordingly. Inconsistencies in emissions coverage directly feeds into concerns about misaligned credit when CBAM attempts to recognise carbon prices paid abroad. Stakeholders stressed that misalignment in scope risks double counting or under-crediting, undermining CBAM's core objective of reducing global emissions. Several comments pointed to the complexity of global supply chains and the difficulty of proving that a carbon price paid abroad corresponds to the same emissions CBAM covers.

Across all responses, stakeholders agree that determining the consistency of emissions covered by carbon prices and those covered by CBAM is the central technical and administrative challenge of the entire CBAM deduction system. They emphasise that the two systems (carbon price vs. CBAM) rarely match in terms of emissions scope, GHGs covered and boundaries. Existing documentation and verification standards are insufficient to reliably prove consistency. Harmonised rules are essential to bridge the gap.

Currency conversion methodology

24 responses (15% of all submissions) addressed the methodology on currency conversion. The overall sentiment was largely neutral across most organisation types, with a few positive remarks from companies and business associations. Respondents primarily offered recommendations and sought clarification. Most responses came from China, Belgium, and Germany. Iron and steel is the top industry respondent (11 responses), followed by a general industry (8 responses), aluminium (3 responses), and electricity (two responses).

Stakeholders emphasised the importance of a standardised currency conversion methodology in translating carbon prices paid in third countries into euros for CBAM purposes. While some respondents simply expressed support for the Commission's ambition to use a methodology that converts the price paid in a foreign currency to euro, the majority called for greater specificity. Stakeholders requested greater clarification on aspects such as currency conversion rates (single-day or average rate), if averages should be weekly, monthly, quarterly, or annual, eligible time window for payments to be considered, and any conversion rates applicable for adjusting methodological differences. Beyond establishing a standardised currency conversion framework, stakeholders noted the need for clarity and simplicity in applying the methodology to reduce administrative burdens and prevent disputes. Others emphasised the importance of publishing applicable exchange rates on a regular basis to ensure uniformity and avoid disputes. Together, these responses underline a call for standardisation, transparency, and simplicity in currency conversion methodology to aid administrative efficiency and consistent application of CBAM.



40 responses (24% of all submissions) addressed the topic of accreditation and independence of third-party certifiers. Most responses came from third countries (22 responses) with quite an even split across countries. From an industry perspective, the highest number of responses came from the general industry sector (13 responses), followed by iron and steel (9 responses), non-CBAM sectors such as universities and ministries (5 responses), chemicals and hydrogen (4 responses), aluminium (3 responses), electricity (2 responses), and cement (1 responses).

Overall, respondents called for rigorous yet proportionate requirements, aligned with established frameworks such as ISO 14064 and the GHG Protocol, and mutual recognition agreements between the EU and third countries to ensure global consistency and lower costs. Concerns were raised about potential trade barriers if only EU verifiers are recognised. Respondents recommended leveraging existing national accreditation structures, digital integration, and sector-specific guidance to simplify administration, facilitate compliance for non-EU manufacturers and SMEs, and maintain the credibility and efficiency of the CBAM.

Stakeholders emphasised the need for clear eligibility and qualification standards for third-party certifiers of carbon pricing evidence, advocating for transparent and well-defined rules to guarantee the independence, accountability, and competence of certifiers. There was widespread support for internationally inclusive standards, with many calling for recognition of certifiers beyond EU-accredited bodies. Aligning CBAM verification processes with established frameworks—such as ISO 14064, the GHG Protocol—was suggested, alongside mutual recognition agreements with third countries to avoid duplicated effort, lower costs, and promote global consistency. Stakeholders called for consistency and robustness in verification standards to uphold the integrity of the CBAM system, noting that requirements should be stringent aligning with EU ETS rules to avoid loopholes yet proportionate to avoid excessive complexity.

Concerns about equitable access and trade barriers were repeatedly raised. Restrictive requirements, such as mandating EU-only accredited verifiers, were highlighted as potential hidden trade barriers. Stakeholders urged acceptance of qualified local or third-country verification bodies, provided they meet internationally recognized standards. There was broad support for the development of local systems, mutual recognition agreements, and sector-specific guidance, as well as harmonised templates and proportionate evidence requirements, to ensure consistent implementation and clarity for all parties. Overall, the engagement revealed a preference for a pragmatic, internationally harmonised, and transparent approach to third-party certification under CBAM, balancing rigour, accessibility, and fairness. Respondents also highlighted the value of administrative simplicity and digital integration, recommending streamlined certification workflows, digital automation, clear guidance, and accredited databases and tools. These measures were particularly vital for non-EU manufacturers and SMEs, aiming to reduce administrative burdens and facilitate compliance.

Recognition of national systems

Eleven responses (7% of all submissions) addressed the topic of recognition of national systems. Overall sentiment was largely neutral, with a few negative views. Respondents were primarily from third countries such as United Kingdom, Thailand, Egypt, Japan, Serbia and Singapore.

Respondents highlighted the technical and administrative challenge of aligning emissions covered by carbon pricing systems and CBAM. There was strong support for harmonised, verifiable methodologies and reliance on actual emissions data, with international standards (e.g., ISO, GHG Protocol) cited as benchmarks. Simplification and standardisation of evidence requirements were seen as essential to avoid disproportionate burdens.

A key issue raised concerns the need for international recognition and inclusivity within the CBAM verification framework. Several respondents highlighted that verification of third-country carbon prices

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[redacted]ost challenging aspects of CBAM implementation, as EU importers are facing major difficulties in obtaining evidence that is both reliable and verifiable. To address this, they proposed that verification bodies should be included regardless of their legal establishment location, by recognising verifiers accredited by internationally recognised organizations (such as the International Accreditation Forum). Respondents also highlighted the importance of leveraging existing accreditation structures provided they meet clear eligibility criteria, to ensure credibility. Stakeholders also noted that the qualification standards should be internationally inclusive and that a certification body should be accepted if it meets internationally recognised certification standards and is accredited by the national certification authority of its home country. Respondents warned that if CBAM only recognised certification bodies within the EU, it would increase the costs and burdens for enterprises and may constitute a hidden trade barrier. Others emphasised the need for methodological consistency, building on existing international protocols (ISO 14067, GHG Protocol, LESS, etc.), as well as the EU ETS MRV rules, to avoid duplication and excessive burden. This highlights that harmonisation is not only about recognising foreign systems but also about aligning technical standards to maintain credibility and efficiency.

Administrative burden and data integrity

Of the 158 submissions received, 16 responses addressed this theme. The majority came from the “General” industry (14), with 1 each from “Iron & Steel” and “Aluminium”. Stakeholders included seven companies, 5 business associations, 2 academic or research institutions, 1 public authority, and 1 EU citizen. Overall sentiment was mixed: negative views cited fraud risk, administrative burden, and lack of clarity, while neutral and positive notions offered constructive proposals for simplification and digital integration.

A recurring theme was the need for procedural simplicity. Stakeholders called for the use of default emission values, linking CBAM obligations to customs procedures, and reducing bureaucracy. Fraud and circumvention risks were also highlighted. Respondents warned of manipulation, misclassification, and deliberate fragmentation of imports to avoid CBAM obligations. Data accuracy and classification consistency of products emerged as another critical issue. Stakeholders pointed to mismatched CN and NACE codes: One party highlights the risk that inconsistencies between CN and NACE codes and the selective inclusion of products may enable misclassification and fragmentation of production processes, while another stresses the broader risk of CBAM circumvention arising from these issues, particularly in complex value chains. Further, participants stressed the importance of using credible sources and recent data for calculations.

Transparency and consultation were also seen as essential. Several responses requested public consultation on deduction rules to build consensus and ensure fair implementation. Finally, proposals for digital integration featured prominently among constructive suggestions. Stakeholders advocated for linking CBAM systems with EU digital registries to streamline compliance and enhance security. In summary, stakeholders broadly agreed on the need to reduce administrative burden, ensure data integrity, and strengthen fraud prevention. While concerns were raised about complexity and risk, many responses offered practical solutions such as default emission values, digital integration, and transparent consultation processes.

4.3.2 Co-ordinated responses (campaigns)

Co-ordinated responses refer to cases where a company or business association encourages its members to submit identical inputs, such as position papers repeating the same points, or joint submissions. In total, 14 such responses were identified and grouped into three distinct response sets.

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Respondent ID & Name	Sector	Main Issues Raised
Joint response paper: **EU and GB Transmission System Operators** (United Kingdom and Ireland)	Electricity	Negative consequences of CBAM on electricity trade; Strong call to proceed with linking the EU ETS and UK ETS as agreed in the EU–UK Summit to avoid CBAM-related trade barriers; propose a temporary exemption from CBAM for UK electricity imports; urge the EC to recognise UK ETS + Carbon Price Support (CPS) as equivalent to EU ETS for CBAM purposes; and propose an ex-ante yearly default carbon price for third countries, published by the EC before each delivery year.
EUROFER paper (Finland, Belgium and Poland)	Iron & steel	Apply a conservative and verifiable approach to the deduction of foreign carbon prices in CBAM; UK ETS is cited as a representative benchmark for recognition; direct or indirect rebates should be fully accounted; other form of cost (e.g. energy taxation) should not be recognised
Join response paper: FEC/IVSH (Germany)	General	Risk of carbon leakage and cost asymmetry; extension of CBAM scope (include high-risk downstream products with more than 70% metal content); compensation mechanism for exporters of downstream products to non-EU markets; anti circumvention measures; regulatory synchronisation