Med-TSO

TeasiMed2 project

Comprehensive overview of Cross Border Adjustment Mechanism (CBAM)

Co-funded by the European Union

Table of content

List of figures

Acknowledgments

This report was prepared by Med-TSO Technical Committee Regulation, chaired by Juan Manuel Rodriguez Garcia, Red Eléctrica, in the frame of Teasimed 2 project.

The drafting team which realized this document was composed of:

Juan Manuel RODRIGUEZ GARCIA (RED ELÉCTRICA - Spain)

Emmanuel BUE (RTE – France)

Enas Adel (EETC – Egypt)

Qais DALAEEN (NEPCO – Jordan)

Sevilay YILMAZ (TEIAŞ - Türkiye)

Soufiene BEL HAJ AMOR (STEG - Tunisia)

Walid BENABED (ONEE- Morocco)

The work could not have been completed without the support and co-operation provided by all the Members of the TC Regulation that have reviewed and approved the document.

Last but not least, thanks go to Med-TSO Secretariat staff and in particular to Ms. Naglaa KHATTAB, Mr. Luca RUFFINO, Mr. Anas EL Hraiech and Mr. Ahmed OVA for their help in coordinating the work for producing the report.

Abbreviations:

CBAM	Carbon Border Adjustment Mechanism
EU ETS	European Union Emissions Trading System
GHG	Green House Gas
Green TIM	Turkish digital platform is prepared for the Turkish companies to assess their Carbon footprint in the Framework of the CBAM
IEA	International Energy Agency
MENAT countries	Middle East and North Africa countries & Türkiye
NDC	National Development Contribution
NECP	National Energy and Climate Plan
UCC	Union Customs Code
UNFCCC	United Nations Framework Convention on Climate Change
WTO	World Trade Organisation

1. Executive Summary

The Carbon Border Adjustment Mechanism (CBAM) is an essential step towards sustainable trade and cleaner production, in line with the EU targets to become climate-neutral by 2050. The report provides an analysis of CBAM, highlighting its role as a key policy tool designed to address climate change and prevent carbon leakage in global trade.

The CBAM sets the carbon price for imports at a level equivalent to the domestic carbon price within EU member states. This mechanism will specifically target goods such as aluminium, cement, electricity, fertilizers, hydrogen, and steel. This report focuses on electricity, with its core sections exploring an understanding of CBAM, outlining its scope, main objectives, and the reasons for its development—particularly in relation to the EU Climate Law and the European Green Deal.

The transition phase of CBAM is from October 2023 to December 2025, during which reporting obligations are gradually introduced. Full implementation is anticipated to begin in 2026, emphasizing the development of a strong and transparent framework. The roles of declarants (entities responsible for reporting emissions embedded in imports) and national authorities is elaborated, outlining their responsibilities for compliance, verification, and enforcement.

A comprehensive section provides guidance on calculating embedded emissions, focusing specifically on electricity imports. It covers methodologies for quantifying carbon emissions, including detailed procedures for calculating emission factors, establishing hierarchy options, and reporting actual emissions where applicable. Practical examples demonstrate how to implement these calculations, ensuring transparency and compliance.

The report discusses pricing strategies and how the effective carbon prices paid outside the EU will be considered to avoid double pricing.

An important part of the analysis addresses exemptions, with real-world examples from regions such as the Energy Community and Türkiye, outlining how different jurisdictions are approaching exemption criteria.

Based on these insights, the report offers key recommendations for policymakers and regulators to facilitate smooth implementation. It emphasizes the need for capacity building, data accuracy, international cooperation, and alignment with global climate commitments.

Overall, this comprehensive document aims to enhance understanding of CBAM's implications, facilitate informed decision-making, and promote alignment with sustainable trade practices, contributing to the broader goal of global climate mitigation

2. Introduction

Climate change is a global problem that needs global solutions. The EU's energy-intensive industries alone contributed up to 22% of the EU total greenhouse gas (GHG) emissions in 2019. With more ambitious GHG emission reduction targets – 55% below 1990 levels by 2030 – there's a risk of carbon leakage. Carbon leakage may occur if, to reduce costs related to climate policies, businesses were to relocate production to other countries with more lenient emission constraints.

This would involve either transferring production from the EU to other countries with lower ambition for emission reduction, or EU products being replaced by more carbon-intensive imports. This could lead to an increase in total GHG emissions.

To achieve its decarbonisation targets, the EU is moving to implement the Carbon Border Adjustment Mechanism (CBAM), a landmark tool to ensure consistent carbon costs between imports and domestic production, and that the EU's climate objectives are not undermined.

The CBAM complements the EU's key tool for cost-effective GHG reduction, the EU Emissions Trading System (EU ETS)[1].

Med-TSO formed a dedicated Task Force to delve into all available documents relevant to (CBAM) specifically focusing on the electricity sector. This includes EU regulations, training presentations, and the most Frequently Asked Questions (FAQs) about CBAM[2]. The TF will highlight implementation phases, pricing strategy, calculation

[1] https://climate.ec.europa.eu/eu-action/eu-emissions-trading-system-eu-ets/what-eu-ets_en

[2] The most Frequently Asked Questions (FAQs) is a Q&A document prepared by the European Commission and provides answers about CBAM. It's continuously updated; the last version was in December 2024. https://taxation-customs.ec.europa.eu/document/download/013fa763-5dce-4726-a204-

of embedded emissions, and exemptions and will provide recommendations to non-EU countries to ensure compliance with the CBAM Regulation.

3. Understanding CBAM: Definition and Objectives.

Carbon Border Adjustment Mechanism (CBAM): It is the EU's tool to put a fair price on the carbon emitted during the production of carbon intensive goods that are entering the EU, and to encourage cleaner industrial production in non-EU countries. By confirming that a price has been paid for the embedded carbon emissions generated in the production of certain goods imported into the EU, the CBAM will ensure the carbon price of imports is equivalent to the carbon price of domestic production, and that the EU's climate objectives are not undermined. The CBAM is designed to be compatible with World Trade Organization (WTO) rules[3].

The European Union (EU) has introduced (CBAM) through a regulatory framework. CBAM aims to regulate greenhouse gas emissions associated with specific goods imported into the EU, including aluminium, cement, electricity, fertilizer, hydrogen, iron and steel. It provides an opportunity for the electricity sector to embrace sustainability and contribute to environmental protection by positioning businesses as socially responsible and environmentally conscious players.

CBAM also applies to electricity generated in and imported from third countries. If these countries fully integrate their electricity markets with the EU and meet specific obligations, they may be exempted from CBAM. The current CBAM regulation provides exemptions for certain third countries. The EU will review exemptions in 2030, considering the partners' decarbonization efforts and equivalent emissions trading systems.

3.1. Relevance of CBAM in addressing climate change on a global scale.

CBAM plays a pivotal role in the global effort to combat climate change by addressing several key issues:

- **Preventing Carbon Leakage:**

CBAM ensures that imported goods are subject to a carbon price equivalent to that imposed on EU domestic products. This mechanism prevents carbon leakage, which occurs when companies relocate production to countries with less stringent emissions regulations to avoid carbon costs. By levelling the playing field, CBAM

69fec04d5ce2_en?filename=CBAM_Questions%20and%20Answers.pdf

[3] https://www.wto.org/english/res_e/webcas_e/ltt_e/ltt10_e.htm#:~:text=

reduces the risk of production shifting to regions with lax emissions standards, thereby maintaining the integrity of the EU's climate policies.

- **Encouraging Global Emission Reductions:**

CBAM ensures that imported goods are subject to a carbon price, encouraging third countries' producers, exporters and policy makers to adopt measures to lower carbon emissions aligning to the EU effort in decarbonization

- **Promoting Sustainable Investments:**

CBAM exerts pressure on companies worldwide to adopt cleaner practices. It encourages emission reductions and stimulates investment in sustainable production methods. Over time, these investments contribute to a global reduction in greenhouse gas emissions and support the transition to a low-carbon economy.

- **Fostering International Cooperation**

CBAM also fosters international cooperation by encouraging countries outside the EU to implement similar carbon pricing mechanisms. As third countries seek to avoid the additional costs associated with CBAM, they may adopt more stringent climate policies and emissions reduction targets. This alignment of climate policies across borders enhances global efforts to mitigate climate change and promotes a more cohesive approach to addressing this critical issue.

4. Timing, process and Concerned Parties:

4.1. Timing:

Figure 1 Gradual introduction of the CBAM[4]

The current transitional phase lasts between 2023 and 2025, while CBAM will be applied in its definitive regime from 2026. This gradual introduction of the CBAM is aligned with the phase-out of the allocation of free allowances under the EU Emissions Trading System (ETS) to support the gradual decarbonization of EU industry.

4.2. Process:

4.2.1. Transitional phase: October 2023 - December 2025

On the 1st of October 2023, the CBAM entered into application in its transitional phase, with the first reporting period for importers ending on the 31st of January 2024. The gradual phasing in of CBAM allows for a careful, predictable and proportionate transition for EU and non-EU businesses, as well as for public authorities.

During the transitional phase, importers report greenhouse gas emissions (GHG) embedded in their imports covering both direct and indirect emissions. There is no need to buy or surrender certificates during this period.

[4] https://kpmg.com/xx/en/home/insights/2021/06/carbon-border-adjustment-mechanism-cbam.html?hl=en-GB

The Implementing Regulation (EU) 2023/1773[5] (article 4) on reporting requirements allows companies to choose from three reporting methods until the end of 2024:

(a) full reporting according to the new EU methodology.

(b) reporting based on an equivalent method (three options available).

(c) reporting based on default reference values (only until July 2024).

Reporting declarants should get in touch with the national competent authority in the country where they are established to gain access to the CBAM Transitional Registry, which will be used to submit CBAM quarterly reports.

As of the 1st of January 2025, The European Commission will use the reported information for general analysis and review of the CBAM. The conclusions will be presented in reports to the European Parliament and the Council before the end of the transitional period. Those reports will investigate different topics on the implications, implementation and functioning of the CBAM. This includes the possibility for extension of the scope to other goods, specifying the methodology and progress made in the international discussions.

From Q1 2025, only the full reporting according to the new EU methodology will be accepted, and estimates (including default values) can only be used for complex goods if these estimations represent less than 20% of the total embedded emissions6.

The European Commission has developed dedicated IT tools to help importers perform and report these calculations, as well as in-depth guidance, training materials and tutorials to support businesses in this transitional phase.

4.2.2. Post Transitional phase: 2026

From January 1, 2026, only authorized CBAM declarants will be able to import CBAM goods into the European Union. These declarants will have to purchase CBAM certificates corresponding to the emissions of the imported

[5] (EU) 2023/1773, includes all the necessary information for reporting rules for the transitional period. https://eur-lex.europa.eu/eli/reg_impl/2023/1773/oj/eng

[6] https://taxation-customs.ec.europa.eu/carbon-border-adjustment-mechanism_en

goods. To align with the EU Emissions Trading System (ETS), the introduction of CBAM certificates will be gradual, in conjunction with the phasing-out of free allowances in the EU ETS.

EU importers of CBAM-covered goods must register with national authorities, where they can also purchase CBAM certificates. The price of these certificates will be based on the weekly average auction price of EU ETS allowances, measured in €/tonne of CO2 emitted.

Each year, EU importers will need to declare the emissions embedded in their imports and surrender the corresponding number of certificates. If importers can demonstrate that a carbon price has already been paid during the production of the imported goods, they can deduct the equivalent amount.

CBAM will work during the definitive period as follows[7]:

- *The CBAM will mirror the ETS in the sense that the system is based on the purchase of certificates by importers. The price of the certificates will be calculated depending on the weekly average auction price of EU ETS allowances expressed in € per tonne of CO2 equivalents emitted. Importers of goods will have to, either individually or through a representative, register to take part in the CBAM and buy CBAM certificates.*
- *The certificates surrendered by the CBAM declarant shall correspond to the number of embedded emissions of the relevant goods expressed in tones of CO2. In addition, there is a possibility to purchase certificates throughout the year.*
- *Member States will sell CBAM certificates through a central platform to authorized declarants. Only authorized CBAM declarants can buy these certificates. By 31 May each year, starting in 2027 for 2026 imports, certificates must be surrendered via the CBAM registry for embedded emissions.*
- *The reporting for embedded emissions is expected to take place under similar conditions than during the transitional period, i.e. exclusively through an online portal, the CBAM registry.*

[7] https://taxation-customs.ec.europa.eu/document/download/013fa763-5dce-4726-a204-69fec04d5ce2_en?filename=CBAM_Questions%20and%20Answers.pdf

4.3. Concerned Parties

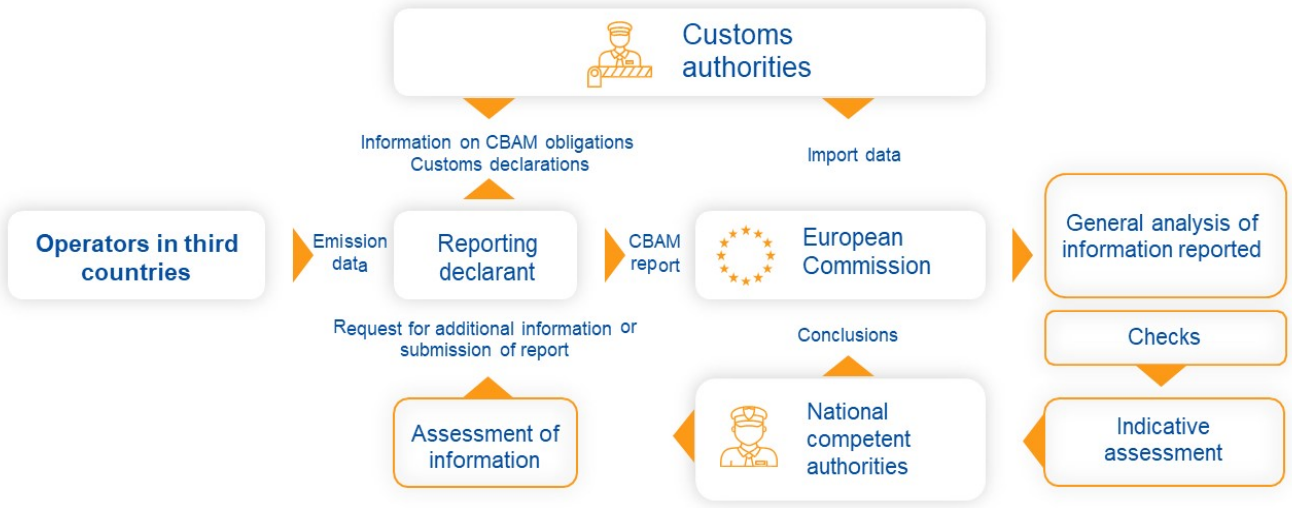

Figure 2 Overview of the actors of CBAM [8]

4.3.1. Rules for representatives (Declarant):

Importation of goods shall only be made by a declarant that is authorized by the competent authority (authorized declarant). (Article 4 of the CBAM Regulation)[9]

- The **"reporting declarant"** is the entity which is responsible for the reporting of embedded emissions of imported goods.
- In principle, the reporting declarant is the "Importer." However, in practice there are different options depending on the person lodging the customs declaration.

[9] REGULATION (EU) 2023/956 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL (10 May 2023)

Figure 3 Rules of Representatives [10]

In line with the options provided under the Union Customs Code (UCC)[11], the reporting declarant can be one of the following:

- **No representation by others (Own Import):** When importers handle the import process independently, without representation by others. The individual, company, or entity importing CBAM goods is responsible for reporting and ensuring compliance with financial obligations and penalties. The importer submits a customs declaration for the release of goods for free circulation in their own name and on their own behalf.
- **Direct representative (Custom Representative):** A third party hired by the importer can handle the reporting if the importer consents, but the financial obligations and penalties remain the responsibility of the importer. This representative, authorized to lodge a customs declaration as per Article 182(1) of the

[10] https://customs- taxation.learning.europa.eu/course/view.php?id=799&section=2

[11] The Union Customs Code (UCC) defines the legal framework for customs rules and procedures in the EU customs territory, adapted to modern trade models and communication tools. (https://taxation-customs.ec.europa.eu/union-customs-code-ucc-introduction_en)

UCC, declares the importation of goods. Note that direct customs representation is not possible if the importer is located outside the EU.

- **Indirect representative (Custom Representative):** A third party responsible for reporting, financial obligations, and penalties is required if importers are based outside the EU. This involves an indirect customs representative, who lodges the customs declaration as per Article 18 of the UCC. This method is used when the importer is established outside the Union or when the indirect customs representative has agreed to the reporting obligations, (Article 32 of the CBAM regulation).
- **Special case:** when the transmission capacity is allocated through explicit capacity allocation, the importer who has been allocated this capacity and nominates it for import will be considered the CBAM reporting declarant in the Member State where the importation of electricity is declared in the customs declaration. (Article 5(4) of the CBAM Regulation)

Who can fill in the CBAM reporting obligation in the CBAM Transitional Registry for the reporting declarant?[12]

- Multiple Transitional Registry user accounts can be linked to the same Economic Operators Registration and Identification (EORI) number if these accounts are from employees of the responsible reporting declarant (The importer or indirect customs representative). However, only one user will be able to edit a particular CBAM quarterly report in the CBAM Transitional Registry at a given time (i.e. it will not be possible to have more than one declarant users editing the same quarterly report simultaneously).
- The Commission is currently exploring solutions allowing the reporting declarants to delegate the filling of the quarterly CBAM reports to external persons without having to share their user credentials. In any event, the reporting declarant will remain responsible for the ensuring the quality of the reports which are submitted.

Authorized declarant shall, by May 31 each year, submit the following:

- A CBAM declaration to the competent authority containing the total emissions embedded in imported goods subject to CBAM regulation during the previous calendar year,

[12] https://taxation-customs.ec.europa.eu/document/download/013fa763-5dce-4726-a204-69fec04d5ce2_en?filename=CBAM_Questions%20and%20Answers.pdf

- The corresponding total number of CBAM certificates to be surrendered. (Article 6-b, c of the CBAM Regulation)

4.3.2. *National Competent Authority:*

Each Member State has designated a national competent authority (NCA), which will carry out the functions and duties as defined in Regulation (EU) 2023/956. In short, NCAs are responsible for checking the quality of the CBAM quarterly reports (with support from the Commission) and engage, where needed, in a dialogue with reporting declarants. NCAs ultimately ensure compliance with CBAM rules, and they may impose penalties. Finally, from 2025 onwards, NCAs will grant the status of 'authorised CBAM declarant'[13].

The list of national competent authorities is published and continuously updated on the dedicated CBAM web page of the European Commission[14]

5. Calculating Embedded Emissions:

'Embedded emissions' means direct emissions released during the production of goods and indirect emissions from the production of electricity that is consumed during the production processes. For electricity, only direct CO_2 emissions are considered.

Embedded emissions in imported electricity shall be determined by reference to default values[15].

Default values for imported electricity shall be determined for a third country, group of third countries or region within a third country based on either of the following specific default values:

- Best data available to the Commission. (CO_2 emission factors will be derived from data provided by the International Energy Agency (IEA) and included in the CBAM Transitional Registry by the Commission). If these values are unavailable,

[13] https://taxation-customs.ec.europa.eu/document/download/013fa763-5dce-4726-a204-69fec04d5ce2_en?filename=CBAM_Questions%20and%20Answers.pdf
[14] Carbon Border Adjustment Mechanism (europa.eu).
[15] in accordance with the method set out in Annex IV of the CBAM Regulation

- Alternative default values may be used (CO_2 emission factor in the Union' or an alternative default value based on that CO_2 emission factor for the third country). (Annex IV (4))

During the definitive period, declared embedded emissions should be verified by a **verifier**, accredited in accordance with specific accreditation rules (to be defined by the Commission during the transitional period), who will prepare a verification report, the European Commission will work during the transitional period on secondary legislation that will establish the rules on accreditation and verification[16].

5.1. Carbon emissions embedded in electricity generation

The implementing Regulation outlines three primary methods for determining the country emission factor:

1. **Country Specific Default Values**:

   This method uses predefined default values for emission factors. These values are established based on typical emissions from electricity generation in various regions or countries. They provide a standardized approach, simplifying the calculation process for importers.

2. **EU Emission Factor:**

   This method uses the emission factor specific to the European Union. It reflects the average emissions from electricity generation within the EU, considering the mix of energy sources used. This factor is updated periodically to reflect changes in the energy mix and improvements in efficiency.

3. **Alternative Country Values:**

   This method allows for the use of emission factors specific to the country of origin of the electricity. These values must be submitted by the declarant and are subject to verification. This approach can provide a more accurate reflection of the actual emissions associated with the imported electricity, especially if the country of origin has a significantly different energy mix compared to the EU. (Annex III, section D.2)

[16] https://taxation-customs.ec.europa.eu/document/download/013fa763-5dce-4726-a204-69fec04d5ce2_en?filename=CBAM_Questions%20and%20Answers.pdf

5.2. Detailed guidance on calculating embedded emissions for electricity imports.

5.2.1. Calculations of emission linked to electricity:

$$Em_{el} = E_{el} * Ee_{l}$$

Whereas:

Em_{el}: are the emissions related to the electricity produced expressed in t CO_2

E_{el}: is the electricity produced expressed in MWh or TJ, and

Ee_{l}: is the emission factor for electricity applied, expressed in t CO_2/MWh or t CO_2/TJ

5.2.2. Hierarchy of CO_2 emission factors:

a) CO_2 country emission factor based on data from the International Energy Agency (IEA)[17]

b) CO_2 country emission factor of the EU based on IEA data, if no value is available under (a)

c) CO_2 alternative emission factor based on reliable data demonstrated by the reporting declarant, if the values are lower than under (a) and (b) and if a specific methodology is used that involves determining the emission factor based on the country/region-specific carbon intensity of electricity generation, which considers the mix of energy sources utilized in each country/region—such as fossil fuels, renewables, and nuclear power. By analysing the proportions of each energy source and their respective emission factors, a comprehensive calculation can be made.

d) Plant-specific CO_2 emission factor based on actual CO_2 emission of the installation if certain conditions are met.

The last two options allow for some degrees of flexibility, allowing the declarant either to use a more accurate/favourable emission factor for the whole country or to provide the exact emission factor for the

[17] https://www.iea.org/data-and-statistics/data-product/emissions-factors-2023

specific installation (ie. production plant). This also has the benefit of allowing to reflect the unique energy profiles and support informed policymaking and climate action efforts in each MENAT country.

CO_2 emission factor - Calculations for options (c) and (d)

- **Calculation of yearly CO_2 emission factor - option (c)**

$$EM_{el,y} = \frac{\sum_i^n EF_i \times E_{el,i,y}}{E_{el,y}}$$

Where:

$EM_{el,y}$ is the yearly CO_2 emission factor for all fossil fuel technologies in the given year in the third country capable of exporting electricity to the EU.

$E_{el,y}$ is the total gross electricity generation from all fossil fuel technologies in that year.

EF_i is the emission factor for each fossil Fuel technology 'i', and

$E_{el,i,y}$ is the yearly gross electricity generation for each fossil fuel technology 'i'.

- **Calculation of the moving average of CO_2 emission factor**

$$Em_{el} = \frac{\sum_{y-6}^{y-2} Em_{el,i}}{5}$$

Where:

Em_{el} is the CO_2 emission factor resulting from the moving average of the CO_2 emission factors of the 5 previous years, starting from the current year, minus two years, until the current year, minus 6 years.

$Em_{el,i}$ is the CO_2 emission factor for each year ' i '.

- i is the variable index for the years to consider, and
- y is the current year.

- **Criteria for reporting actual emissions (option (d)):**

The actual embedded emissions data of a specific electricity-producing installation may be used, if the following conditions can be met, bearing in mind that the criteria are cumulative (CBAM Regulation (1) Annex IV, section 5):

I. The amount of electricity for which the use of actual embedded emissions is claimed is covered by a power purchase agreement between the authorized CBAM declarant and a producer of electricity located in a third country.

II. The installation producing electricity is either directly connected to the EU transmission system or it can be demonstrated that at the time of export there was no physical network congestion at any point in the network between the installation and the Union transmission system.

III. The installation producing electricity does not emit more than 550 grammes of CO_2 of fossil fuel origin per kWh of electricity.

IV. The amount of electricity for which the use of actual embedded emissions is claimed has been firmly nominated to the allocated interconnection capacity by all responsible transmission system operators in the country of origin, the country of destination and, if relevant, each country of transit, and the nominated capacity and the production of electricity by the installation refer to the same period of time, which shall not be longer than one hour.

In case of transit through any non-EU country, no emission factor for the transit country shall be considered in the CBAM report.

5.3. Calculation of CO2 emission factors (Demonstrative example):

A detailed example of calculating CO_2 emission factor – considering options (c) for Morocco, Türkiye (currently connected with EU countries) and Algeria, Tunisia, Egypt, and Lebanon (anticipated to establish interconnections with EU countries in the future).

- Data Sources Utilized
  - **Annual Thermal Generation (MWh):** Sourced from the Med-TSO Statistical Platform.[18]
  - **CO2 Emission Factors (Kg/Net GJ):** These factors were gathered for each fuel type and generation technology from the TYNDP 2024 Scenarios.[19]
  - **Standard Efficiency Factor**: A standard efficiency factor for thermal power plants (PP) was utilized in calculations.

The calculations adhered to the methodologies outlined in Section 5.2.2.c , which was instrumental in deriving the average CO2 emission factor for the years 2018 to 2022. The resultant figures will serve as an indicative reference for evaluating CO2 emissions within the region.

CO2 emission factor has been calculated for the annual thermal generation as a range within 10% (± 5% of the calculated value) to show that these figures are indicative rather than precise, as they depend on the sources of input data (detailed calculations are in Appendix),

Focusing on Morocco, Türkiye (currently connected to Spain, and Greece respectively) and Tunisia (ELMED is the most mature project connecting Tunisia and Italy) which will be directly affected from applying CBAM regulation in case of exporting non-renewable electricity to EU countries, the range of CO_2 emission factor for annual thermal generation:

- Morocco: 798 – 882 kg CO_2/MWh
- Türkiye: 731 – 808 kg CO_2/MWh
- Tunisia: 400 – 442 kg CO_2/MWh

[18] https://data.med-tso.org/
[19] https://2024.entsos-tyndp-scenarios.eu/download/

- **Recalculation of CO_2 emission factor Using IEA Database**

  To enhance the robustness of our findings, we also recalculated the CO_2 emission factor using data from the International Energy Agency (IEA) database. This database provides comprehensive annual thermal generation data as well as the annual CO_2 emissions resulting from electricity and heat production, categorized by fuel type.

  A deviation in the recalculated emission factors was observed, ranging from 1% to 13%, This variation can be attributed to differences in data sources related to annual thermal generation and the reported emission amounts, leading us to conclude that these deviations are acceptable.

- **Understanding Data Sources and Comparisons**

  The IEA report titled "Database Documentation 2024 Edition"[20] highlights the importance of exercising caution when comparing CO_2 emission factors derived from IEA data with those from other sources. Discrepancies between IEA estimates and a country's official submissions can result from several factors, including the aggregation of data from various official sources, such as ministries, central statistical bureaus, and nationalized electricity companies. Furthermore, information may also be collected from energy suppliers, end consumers, or customs statistics, all of which can contribute to variations in the reported figures.

- **financial implications of emissions from Thermal generation:**

  The Trading Economics platform[21] provides valuable information on carbon prices related to carbon trading markets and emissions trading systems. The carbon prices reflect the financial cost of emitting carbon dioxide and other greenhouse gases, expressed as CO_2 equivalent (CO_2e) as will be demonstrated in the following section.

[20] https://iea.blob.core.windows.net/assets/adcb9ea4-fc85-4379-826f-bbdd57401fa5/IEA_Methodology_Emission_Factors_2024.pdf
[21] https://tradingeconomics.com/commodity/carbon

6. Pricing Strategies:

Under the CBAM definitive regime (starting from 2026) the EU importers will declare the emissions embedded in their imports and surrender the corresponding number of certificates each year.

The European Commission shall calculate the price of **CBAM certificates** as the average of the closing prices of EU ETS allowances on the common auction platform for each calendar week expressed in € per tonne of CO_2 equivalents emitted. (CBAM Regulation- article 21).

CBAM is compatible with other ETS systems outside the EU[22] as follows:

- the price of the CBAM certificates to be purchased for the importation of the CBAM goods will be the same as for EU producers under the EU Emissions Trading System (EU ETS).
- the effective carbon prices paid outside the EU will be deducted from the adjustment to avoid a double price.
- This carbon price paid in a third country could for example be due to an established emissions trading system. **The Commission will, before the end of the transitional period, adopt secondary legislation to design the rules and processes to consider the effective carbon price paid abroad.**
- Only the carbon price that has been "**effectively paid in the country of origin**" will count for a reduction of the number of CBAM certificates.

CBAM certificates shall be sold on a common central platform that shall be established by the European Commission. Only authorised CBAM declarants are allowed to purchase certificates. (CBAM Regulation- article 20).

If importers can prove that a carbon price has already been paid during the production of the imported goods, the corresponding amount can be deducted.

[22] https://taxation-customs.ec.europa.eu/document/download/013fa763-5dce-4726-a204-69fec04d5ce2_en?filename=CBAM_Questions%20and%20Answers.pdf

6.1. Impact on electricity costs and competitiveness

- **Electricity Costs:**
  - CBAM introduces a carbon price on imported electricity based on its emissions intensity. Importers must pay for the carbon content of their imports.
  - Consequently, CBAM could be one of the factors contributing to an increase in electricity prices.
- **Competitiveness:**
  - Domestic electricity producers within the EU may gain a competitive advantage. Their products already comply with EU emissions standards, avoiding additional carbon costs.
  - Importers, especially those relying on fossil fuel-based electricity, may face challenges. They need to adapt to CBAM requirements or explore cleaner energy options.
  - The overall impact on competitiveness depends on the specific energy mix, technological advancements, and policy adjustments.

7. Exemptions:

Once the electricity markets of third countries are closely integrated into that of the Union through market coupling (i.e. with an implicit allocation of cross-border transmission capacity), technical solutions should be found to ensure the application of the CBAM to electricity exported from those countries into the customs territory of the Union.

If technical solutions cannot be found, third countries whose markets are coupled with that of the Union should benefit from a time-limited exemption from the CBAM until 2030 with regard solely to the export of electricity, provided that certain conditions are met. Those third countries should:

- Develop a roadmap and commit **to implementing a carbon pricing mechanism providing for a price that is equivalent to the EU ETS, and**
- Commit to achieving **carbon neutrality at the latest by 2050**
- Align with Union legislation in the areas of environment, climate, competition and energy.

Such exemption should be withdrawn at any time if there are reasons to believe that the country in question does not fulfil its commitments or if it has not adopted by 2030 an emissions trading system equivalent to the EU ETS. (CBAM Regulation, Whereas (56))

7.1. Examples (Energy Community Tracker, Türkiye)

7.1.1. Energy Community:

The Energy Community Treaty Organization: This is an international organization established in 2006. Its main objective is to extend the European Union's internal energy market rules to countries in South-east Europe and the Black Sea region. Its members are Albania, Bosnia and Herzegovina, Georgia, Kosovo, Montenegro, Moldova, North Macedonia, Serbia, and Ukraine.

CBAM Readiness:

In 2021, the Energy Community Ministerial Council adopted a Decarbonization Roadmap to path toward climate neutrality by 2050[23], and on 15 December 2022, adopted Decision 2022/03/MC-Ence[24] on the incorporation of the European Union's electricity market acquis in the Energy Community together with Procedural Act 2022/01/MC-EnC[25] on fostering regional energy market integration. With these acts the Contracting Parties obliged themselves to bring into force the laws, regulations and administrative provisions necessary to comply with the new provisions by 31 December 2023.

In October 2024, the Energy Community published the last edition of CBAM-Readiness tracker[26] that provides an overview of the latest developments and the progress of Contracting Parties towards complying with the conditions for an exemption from CBAM for electricity. It focuses on the progress towards implementing electricity market coupling, the plans for avoiding the costs of CBAM such as via the introduction of domestic carbon pricing equivalent to the EU ETS, the achievements towards and plans for decarbonizing the energy system and putting in place a strong governance system for a successful green transition.

The work on implementing the three main pillars of the green transition in the Energy Community continued in

[23] https://www.energy-community.org/dam/jcr:e80050af-7aa9-4faf-8bf2-d75df294fc7d/EC_ECTWG_roadmap_062021.pdf
[24] https://www.energy-community.org/dam/jcr:d5a1a894-88db-4326-818b-f2c648bd237e/Decision03-2022-MC_newELacquis_15-12-2022.pdf
[25] https://www.energy-community.org/dam/jcr:2e32c79c-7a00-4f85-8481-e377218a7bb2/MCPA202201_%20REM_15-12-2022.pdf
[26] https://www.energy-community.org/news/Energy-Community-News/2025/01/14.html

2024, notably related to the Clean Energy Package[27], the electricity Integration Package[28], and the 2030 targets for GHG emission reduction. While activities aimed at the transposition of the Electricity Integration Package are ongoing in all Contracting Parties, delay in its completion is slowing down earlier plans for electricity market coupling. **Given that market coupling is a precondition for obtaining an exemption from CBAM in electricity**, the lack of its implementation poses the risk that electricity imports from Contracting Parties to the EU will be subject to financial adjustment under CBAM starting from January 2026.

The commitment to the 2030 Energy Community targets and the policies and measures to achieve them are two cornerstones of the integrated National Energy and Climate Plans ("NECPs"). To date:
- All Contracting Parties except Montenegro have submitted a draft NECP.
- The NECPs of Albania, North Macedonia, Georgia, Serbia and Ukraine have been adopted.
- Significant Alignment among Contracting Parties with the 2030 targets set out in the Ministerial Council Decision[29].

Compliance with the CBAM exemption criteria for electricity

Progress in electricity market coupling – which is a precondition for an exemption from CBAM for electricity to be considered – remains weak, as the transposition of the Electricity Integration Package, adopted by the Ministerial Council in December 2022 has not been completed by any Contracting Party so far and several practical milestones have failed to be met.

Regarding climate neutrality by 2050, progress varies among Contracting Parties. Only Moldova has adopted a climate law, and Georgia has adopted a long-term strategy, both including commitments to climate neutrality as required by the CBAM Regulation. However, both criteria—long-term strategy and climate law—must be

[27] Decision 2021/14/MC-EnC on the incorporation of Directive (EU) 2018/2001, Directive (EU) 2018/2002, Regulation (EU) 2018/1999, Delegated Regulation (EU) 2020/1044 and Implementing Regulation (EU) 2020/1208 in the Energy Community acquis

[28] Decision 2022/03/MC-EnC on the incorporation of Regulation (EU) 2019/942, Regulation (EU) 2019/943, Regulation (EU) 2015/1222, Regulation (EU) 2016/1719, Regulation (EU) 2017/2195, Regulation (EU) 2017/2196, Regulation (EU) 2017/1485 in the Energy Community acquis, amending Annex I of the Energy Community Treaty and on the amendments of the Ministerial Council Decisions No 2021/13/MC-EnC and No 2011/02/MC-EnC

[29] Decision 2022/05/MC-EnC on amending Annex I to the Treaty establishing the Energy Community and incorporating Implementing Regulation (EU) 2018/2066, Implementing Regulation (EU) 2018/2067 and Directive 2003/87/EC in the Energy Community acquis

satisfied simultaneously to qualify for CBAM exemption.

Carbon Pricing Instruments

Since the 2021 Decarbonization Roadmap, progress in developing carbon pricing policy tools among Contracting Parties has been limited. Albania and Ukraine have implemented environmental taxes since 2008, while Montenegro established an emissions trading system in 2020, though its effectiveness is hindered by a limited number of installations and limited trading activity.

Although CBAM has fostered a noticeable increase in government discussion on carbon pricing, most initiatives remain at early stages of scoping and impact assessment. Draft NECPs show few detailed plans for carbon pricing, mainly indicating an intention to introduce such measures in the future.

The Energy Community Secretariat has identified and submitted a comprehensive list of technical issues raised by stakeholders concerning CBAM implementation. The European Commission reaffirmed its commitment—working alongside the Secretariat—to address these complexities, especially in the electricity sector.

On 1 July 2025, the Energy Community Secretariat and the European Commission co-hosted a technical forum to explore the interactions between CBAM and ongoing regional electricity market integration efforts. Key topics included the implications of CBAM for cross-border electricity flows, market liquidity, hedging strategies, and renewable energy deployment. In this sense, participants largely agreed on the importance of completing full market coupling between EU Member States and Contracting Parties, avoiding unintended negative consequences of CBAM implementation, safeguarding regional market integration beyond 2026, and strengthening the role of renewables in the decarbonization of the electricity mix.

7.1.2. Türkiye:

Aligning with the global efforts to combat climate change and accelerate energy transition, in July 2021 Türkiye announced the Green Deal Action Plan, targeting a shift to a sustainable and circular economy. In October 2021, Türkiye ratified the Paris Agreement and subsequently committed to achieving a net zero-economy by the end of 2053.

The policies and policy instruments implemented by the EU in the transition to a net-zero emission economy serve as an example for Türkiye during its transition. Particularly since 2021, Türkiye has developed various energy and climate policies, including:

- Green Deal Action Plan (2021)
- Ratification of the Paris Climate Agreement (2021)
- 2053 Net Zero Emission Target (2021)
- Organization of the "Climate Summit" by the Ministry of Environment,
- Urbanization and Climate Change (2022)
- Announcement of the Nationally Determined Contributions (NDC) at the COP27 Climate Summit in Egypt (2022)

Türkiye has technologies such as solar and wind power into the grid. Additionally, the “Türkiye Hydrogen Technologies Strategy and Roadmap” released in 2023, focuses on the role of hydrogen in an economy devoid of carbon emissions by 2053. Accordingly, it presents a roadmap for research and development (R&D) initiatives and implementation programs for green hydrogen production in Türkiye, aiming to develop indigenous and clean hydrogen technologies.

In addition to these, in the short term in Türkiye the following activities are foreseen:

- Elaborate the strategy and roadmap for the energy sector in line with the 2053 net zero greenhouse gas target,
- Entry into force of Climate Law,
- Establishment of a roadmap for carbon pricing.

The strategic targets related to carbon pricing in the Climate Change Mitigation Strategy and Action Plan[30] (2024-2030) published by the Ministry of Environment, Urbanization and Climate Change are given below:

1. **Establishing Emissions Trading System (ETS) in Türkiye**

Türkiye plans to establish an ETS in line with the 2053 Net Zero Emission Target. This system will involve steps such as determining the sectors to be covered, setting an emissions cap, and analyzing the economic, social, and technical impacts. Additionally, the revenues from the ETS will be used to support a low-carbon economy and a just transition in line with the green development target, by also considering the Nationally Determined Contributions. A pilot phase will be planned to test the system's feasibility. Türkiye aims to align with the European Union ETS and will consider including financial actors in the ETS market.

2. Conducting Infrastructure Studies on Other Carbon Pricing Instruments:

Besides ETS, studies will explore complementary carbon pricing mechanisms. One approach is to modify the Special Consumption Tax (SCT) to include carbon content, aiming to establish a national carbon price.

3. Building Infrastructure for Voluntary Carbon Market and National Offset System:

Türkiye will work on building infrastructure for a voluntary carbon market, and a national carbon offset system. The voluntary carbon market registration system will be updated, and a national carbon crediting system will be developed. This system will be aligned with international standards.

4. Conducting studies to evaluate participation in Article 6 of Paris Agreement:

Türkiye will evaluate its participation in the market and non-market mechanisms under Article 6 of the Paris Agreement. This includes studying Türkiye's role in international market practices and participation in pilot projects initiated by other countries.

5. Establish a platform for Turkish companies

In addition, a unique platform has been created for Turkish companies to assess their carbon footprint under CBAM. The digital platform (Green TIM[31]) has been developed for exporting companies which are mainly in the

[30] https://iklim.gov.tr/db/turkce/icerikler/files/CLIMATE%20CHANGE%20MITIGATION%20STRATEGY%20AND%20ACTION%20PLAN%20_EN(1).pdf

[31] https://www.greentim.com

iron and steel, cement, aluminum, fertilizer and electricity sectors. A validated company account is needed to use the platform.

Through Green TIM the export companies will be able to calculate and report their corporate carbon footprints through the platform (free of charge). Companies will be able to calculate, report and, if necessary, facilitate the reduction of their corporate carbon footprint on the platform. Information and documents on greenhouse gas emissions, current versions of regulations and bylaws can be found through the platform.

3 main phases have been dedicated for companies on the platform:

Detection phase: the companies can carry out calculations to determine their carbon emissions in line with international standards, perform analyses based on the resulting emissions, prepare reports and access information, documents and training to raise awareness.

Verification phase: Companies conducting relevant analyses and due diligence can use the platform to meet international standards.

Road map phase: in light of the results, companies will be able to move to the road map stage and access the recommendations and reports for action plans.

8. Recommendations

- **Action list for non-EU market participants:**

To prepare for the implementation of CBAM, non-EU resident exporters can consider the following steps:

- Develop an internal monitoring system for emissions data.
- Establish verification schedules.
- Designate an indirect customs representative to facilitate compliance with CBAM regulations.
- Monitor domestic carbon sources to assess the potential impact on prices and competitiveness.
- Activate long term CBAM compliant PPAs.
- Engage with CBAM institutions to discuss the recognition of national measures within the CBAM framework.
- Participate in cross – regional co-operation to allow for global trade.

- **Required governmental actions:**
  - Legislation for carbon footprint transparency:
    - Develop a national carbon accounting framework: developing a standardized national system for tracking and reporting emissions for industries under CBAM and ensure they are compliant with EU requirements will inform policy makers on carbon intensity and where emissions lie.
    - Strengthening ties with EU policy makers
    - Engage in discussions with the EU to seek recognition of domestic climate reporting and carbon pricing mechanisms as equivalent to the EU ETS, aiming to minimize CBAM's impact on exports.
    - New domestic certification: develop new green certifications which capture all the necessary information for CBAM including use of Guarantees of Origin.

In conclusion, while significant progress has been made in understanding CBAM and its potential implications, certain aspects are still unclear from TSOs perspectives. Recognizing these challenges, ENTSO-E approved a detailed position[32] on June 5th, 2025, addresses concerns regarding the revision of CBAM. they point out potential administrative burdens on TSOs that could hinder EU competitiveness. **ENTSO-E advocates for exempting TSO activities due to minimal carbon leakage risk, proposes an impact assessment with a longer transition period, and urges the European Commission to refine the mechanism, especially regarding grid interconnections with third countries. They specifically suggest utilizing the Omnibus sustainability package to delay the definitive start date beyond January 1, 2027, facilitating a smoother transition that protects the European electricity market's integrity.**

[32] https://eepublicdownloads.blob.core.windows.net/public-cdn-container/clean-documents/Publications/Position%20papers%20and%20reports/2025/20250610_CBAM_Position_Paper.pdf

9. Appendix: Calculations of Average CO2 emission for thermal generation[33]

9.1. Fuel data:

Fuel		Technology	CO_2 emission factor			
			Kg/Net GJ	conversion factor	kg / MWh	efficiency Factor
Hard coal		old 1	94.00	3.6	**967**	35%
		old 2	94.00	3.6	**846**	40%
		new	94.00	3.6	**736**	46%
Lignite		old 1	101.00	3.6	**1039**	35%
		old 2	101.00	3.6	**909**	40%
		new	101.00	3.6	**790**	46%
Gas		conventional old 1	57.00	3.6	**570**	36%
		conventional old 2	57.00	3.6	**500**	41%
		CCGT old 1	57.00	3.6	**513**	40%
		CCGT old 2	57.00	3.6	**428**	48%
		CCGT present 1	57.00	3.6	**366**	56%
		CCGT present 2	57.00	3.6	**354**	58%
		CCGT new	57.00	3.6	**342**	60%
		OCGT old	57.00	3.6	**586**	35%
		OCGT new	57.00	3.6	**489**	42%
Light oil		Light oil	78.00	3.6	**802**	35%
Heavy oil		old 1	78.00	3.6	**802**	35%
		old 2	78.00	3.6	**702**	40%
Oil shale		old	100.00	3.6	**1241**	29%
		new	100.00	3.6	**923**	39%

[33] All calculations are according to data sources mentioned in Item 5.3

9.2. Average CO2 emissions for thermal Generation:

Morocco

Fuel	Technology	CO_2 emission factor kg / MWh	2018		2019		2020		2021		2022	
			Yearly Energy generated (TWh)	Yearly CO2 emissions (Mt)	Yearly Energy generated (TWh)	Yearly CO2 emissions (Mt)	Yearly Energy generated (TWh)	Yearly CO2 emissions (Mt)	Yearly Energy generated (TWh)	Yearly CO2 emissions (Mt)	Yearly Energy generated (TWh)	Yearly CO2 emissions (Mt)
Hard Coal	Old (by-default)	907	21	19	27	24	27	25	28	26	29	26
Hard Coal	new units	736		0		0		0		0		0
Lignite	Old (by-default)	974		0		0		0		0		0
Lignite	new units	790		0		0		0		0		0
Gas	single cycle	536		0		0		0		0		0
Gas	Combined-cycle	373	5	2	5	2	3	1	3	1	1	0
Light oil		802	0.4	0.3	0.3	0.2	0.3	0.3	0.4	0.3	0.8	0.6
Heavy oil		752	0.8	0.6	0.4	0.3	0.1	0.1	0.7	0.6	3.2	2.4
Oil shale		1082	0	0	0	0	0	0	0	0	0	0
Total			**28**	**22**	**32**	**27**	**31**	**26**	**33**	**28**	**34**	**30**
Yearly CO2 emission Factor (kg/MWh)			**801**		**827**		**846**		**846**		**879**	

Average of the CO2 emission factors of the 5 previous years, starting from the current year minus two years, until the current year minus 6 years (kg/MWh) =	**840**
Average of thermal generation of the 5 previous years, starting from 2018 till 2022 (TWh) =	**31**

Turkiye

Fuel	Technology	CO_2 emission factor	2018		2019		2020		2021		2022	
		kg / MWh	Yearly Energy generated (TWh)	Yearly CO2 emissions (Mt)	Yearly Energy generated (TWh)	Yearly CO2 emissions (Mt)	Yearly Energy generated (TWh)	Yearly CO2 emissions (Mt)	Yearly Energy generated (TWh)	Yearly CO2 emissions (Mt)	Yearly Energy generated (TWh)	Yearly CO2 emissions (Mt)
Nuclear		0		0		0		0		0		0
Hard Coal	Old (by-default)	806	2	1	2	1	2	1	2	1	1	1
Hard Coal	new units	994	62	62	60	60	62	61	55	54	63	62
Lignite	Old (by-default)	1152	39	45	41	47	33	38	38	44	40	46
Lignite	new units	790		0		0		0		0		0
Gas	single cycle	536	17	9	15	8	17	9	19	10	14	8
Gas	Combined-cycle	374	73	27	41	15	52	20	90	34	59	22
Light oil		802		0		0		0		0		0
Heavy oil		752	0.3	0.2	0.3	0.2	0.3	0.2	0.3	0.2	0.4	0.3
Oil shale		1082		0		0		0		0		0
Total			**194**	**145**	**159**	**132**	**166**	**130**	**203**	**143**	**178**	**139**
Yearly CO2 emission (kg/MWh)			**749**		**829**		**781**		**704**		**783**	

moving average of the CO2 emission factors of the 5 previous years, starting from the current year minus two years, until the current year minus 6 years (kg/MWh) =	**769**
Average of thermal generation of the 5 previous years, starting from 2018 till 2022 (TWh) =	**180**

Tunisia

Fuel	Technology	CO_2 emission factor	2018		2019		2020		2021		2022	
		kg / MWh	Yearly Energy generated (TWh)	Yearly CO2 emissions (Mt)	Yearly Energy generated (TWh)	Yearly CO2 emissions (Mt)	Yearly Energy generated (TWh)	Yearly CO2 emissions (Mt)	Yearly Energy generated (TWh)	Yearly CO2 emissions (Mt)	Yearly Energy generated (TWh)	Yearly CO2 emissions (Mt)
Hard Coal	Old (by-default)	907		0		0		0		0		0
Hard Coal	new units	736										
Lignite	Old (by-default)	974		0		0		0		0		0
Lignite	new units	790		0		0		0		0		0
Gas	single cycle	536	6	3	6	3	6	3	6	3	4	2
Gas	Combined-cycle	373	13	5	13	5	13	5	13	5	15	6
Light oil		802		0.0		0.0		0.0		0.0		0.0
Heavy oil		752		0		0		0		0		0
Oil shale		1082		0		0		0		0		0
Total			**19**	**8**	**19**	**8**	**19**	**8**	**19**	**8**	**19**	**8**
Yearly CO2 emission (kg/MWh)			**422**		**426**		**425**		**424**		**407**	

moving average of the CO2 emission factors of the 5 previous years, starting from the current year minus two years, until the current year minus 6 years (kg/MWh) =	**421**
Average of thermal generation of the 5 previous years, starting from 2018 till 2022 (TWh) =	**19**

10. References:

a. Regulations:

- REGULATION (EU) 2023/956 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 10 May 2023 establishing a carbon border adjustment mechanism (https://eur-lex.europa.eu/eli/reg/2023/956/oj)

Article 7 – Calculation of the embedded emissions

ANNEX I (p.39) - List of goods and greenhouse gases.

ANNEX III (p.46) - Third countries and territories outside the scope of this Regulation for the purpose of Article 2. (In Mediterranean: Ceuta, Melilla)

ANNEX IV (p.47) - Methods for calculating embedded emissions for the purpose of Article 7

ANNEX V (p.51) - Bookkeeping requirements for information used for the calculation of embedded emissions for the purpose of Article 7(5).

ANNEX VI (p.52) - Verification principles and content of verification reports for the purpose of Article 8.

- COMMISSION IMPLEMENTING REGULATION (EU) 2023/1773 of 17 August 2023 laying down the rules for the application of Regulation (EU) 2023/956 of the European Parliament and of the Council as regards reporting obligations for the purposes of the carbon border adjustment mechanism during the transitional period. https://eur-lex.europa.eu/eli/reg_impl/2023/1773/oj

ANNEX I (p.20) - Information to be submitted in the CBAM reports.

ANNEX II (p.30) - Definitions and production routes for goods.

ANNEX III (p.49) - Rules for determining data including on emissions at installation level, attributed emissions of production processes, and embedded emissions of goods.

Section D.2 (p. 77) Rules for determining the emission factor of electricity as imported goods.

ANNEX IV (p.88) - Content of the recommended communication from operators of installations to reporting declarants.

ANNEX V (p.91) – EORI data.

ANNEX VI (p.93) – Data Requirements complement for Inward Processing.

ANNEX VII (p.94) – National system data.

ANNEX VIII (p.95) – Standard factors used in the monitoring of direct emissions at installation level.

ANNEX IX (p.100) – Harmonised efficiency reference values for separate production of electricity and heat.

b. Presentations and Sector-Specific Materials

- Carbon Border Adjustment Mechanism (CBAM) : Electricity Sector Presentation - https://customs-taxation.learning.europa.eu/pluginfile.php/31230/mod_resource/content/2/CBAM_Webinar_Electricity sector.pdf
- FAQ document prepared by the Commission (version of 28 February 2024). https://taxation-customs.ec.europa.eu/document/download/013fa763-5dce-4726-a204-69fec04d5ce2_en?filename=CBAM_Questions%20and%20Answers.pdf

c. Strategic, Policy Documents and Position Paper

- Turkish Climate Change Mitigation strategy and action plan 2024-2030, https://iklim.gov.tr/db/turkce/icerikler/files/CLIMATE%20CHANGE%20MITIGATION%20STRATEGY%20AND%20ACTION%20PLAN%20_EN(1).pdf
- Energy Community CBAM-Readiness Tracker 2024, https://www.energy-community.org/implementation/package/CBAM.html
- ENTSO-E position on the revision of the Carbon Border Adjustment Mechanism - 5 June 2025.https://eepublicdownloads.blob.core.windows.net/public-cdn-container/clean-documents/Publications/Position%20papers%20and%20reports/2025/20250610_CBAM_Position_Paper.pdf

d. Data and Methodology Documentation

- "Greenhouse gas emissions from energy" Database Documentation 2024 Edition - IEA https://iea.blob.core.windows.net/assets/e01b3c1e-faa1-41bc-981d-86b31cc7e25e/Databasedocumentation2024edition.pdf

Med-TSO Legal Headquarters - Viale Egidio Galbani,
70 – 00156 Rome – Italy • Info@med-tso.com • www.med-tso.com

Co-funded by
the European Union

This publication was co-funded by the European Union. Its contents are the sole responsibility of Med-TSO and do not necessarily reflect the views of the European Union.