Joint Open Letter - CBAM Trilogue Must Deliver a Strong and Efficient CBAM

Brussels, 11 November 2026

Dear MEP Chahim, Minister Harris, and Commissioner Hoekstra:

As the European Parliament and the Council approach the final phase of legislative work on the Commission proposal to extend CBAM to downstream sectors, we – the undersigned key CBAM sectors - are writing to express our utmost support for a strong and effective CBAM that must be secured in the trilogue. To recall: the key purpose of CBAM is to ensure a level playing field for EU industry under EU ETS. That principle – protection of EU industry from carbon leakage – must underpin CBAM as we move towards the post-2030 period.

With this in mind, we ask that you keep four main principles as you conclude the trilogue.

First, while we recognize that in today's volatile world sudden increase in import prices can cause disturbances on the EU market, the response cannot be *ad hoc* removal of sectors from CBAM, no matter how strongly circumscribed by additional conditions. CBAM is a measure to protect EU industries under EU ETS from carbon leakage and that risk continues regardless of global conditions. Also, investment certainty requires that once a sector is in CBAM, it remains in CBAM for foreseeable future. Any responses to any market disturbances – in particular when carbon cost is not the main culprit of any disturbances – cannot expose CBAM sectors to carbon leakage. Other solutions addressing these concerns must be found, including financial support for affected sectors or further downstream extension of CBAM. Hence, we strongly encourage you to keep the Parliament's approach to deleting the proposed art. 27a. For the same reasons, we urge you to endorse the Parliament's position of deleting article 28a, which allows to remove countries from the CBAM scope under a fast-track urgency procedure.

Second, one of the key methods for shielding downstream sectors from adverse impact of CBAM is to include them in CBAM. For this reason, we strongly support the extension to downstream sectors proposed by both the Parliament and Council. A broad CBAM scope is about ensuring that products manufactured in Europe are not systematically disadvantaged by the EU carbon costs, as well as preserving the economic rationale for investing in cleaner industrial production in the EU.

Third, within the negotiations we insist that any loopholes for circumvention are closed, in particular by establishing a robust mechanism to tackle resource shuffling via the application of default values for cases at highest risk. Furthermore, upon the publication of the revised CBAM Regulation, it is essential to strengthen the traceability of CBAM goods in the secondary legislation, including through the sampling procedures and, where relevant, the information on melt and pour and the material and chemical composition of goods through TARIC codes.

Fourth, we would like to reiterate our wider request for transparency to at least ensure that the publicly available information provided within CBAM mirrors what is provided within the ETS registry with regards to total emissions of installations and their identification.

With the above four principles in mind, we trust that you will arrive – in a timely fashion – at solutions that maintain a robust and effective CBAM, which secures the future of CBAM sectors as we continue in our decarbonization effort.