Introduction

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

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

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

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

About you

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

I am giving my contribution as
- Academic/research institution
- Business association
- Company/business organisation
- Consumer organisation
- EU citizen
- Environmental organisation
- Non-EU citizen
- Non-governmental organisation (NGO)
Public authority

Trade union

Other

First name
Daria

Surname
Nochevnik

Email (this won't be published)
d.nochevnik@efet.org

Scope
- International
- Local
- National
- Regional

Organisation name
European Federation of Energy Traders

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

Transparency register number
38589651649-14

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

- Afghanistan
- Åland Islands
- Albania
- Algeria
- American Samoa
- Andorra
- Angola
- Anguilla
- Antarctica
- Antigua and Barbuda
- Argentina
- Armenia
- Aruba
- Australia
- Austria
- Azerbaijan
- Bahamas
- Bahrain
- Bangladesh
- Barbados
- Belarus
- Belgium
- Djibouti
- Dominica
- Dominican Republic
- Ecuador
- Egypt
- El Salvador
- Equatorial Guinea
- Eritrea
- Estonia
- Eswatini
- Ethiopia
- Falkland Islands
- Faroe Islands
- Fiji
- Finland
- France
- French Guiana
- French Polynesia
- French Southern and Antarctic Lands
- Gabon
- Georgia
- Germany
- Libya
- Liechtenstein
- Lithuania
- Luxembourg
- Macau
- Madagascar
- Malawi
- Malaysia
- Maldives
- Mali
- Malta
- Marshall Islands
- Martinique
- Mauritania
- Mauritius
- Mayotte
- Mexico
- Micronesia
- Moldova
- Monaco
- Mongolia
- Montenegro
- Saint Martin
- Saint Pierre and Miquelon
- Saint Vincent and the Grenadines
- Samoa
- San Marino
- São Tomé and Príncipe
- Saudi Arabia
- Senegal
- Serbia
- Seychelles
- Sierra Leone
- Singapore
- Sint Maarten
- Slovakia
- Slovenia
- Solomon Islands
- Somalia
- South Africa
- South Georgia and the South Sandwich Islands
- South Korea
- South Sudan
- Spain
| Chad | Ireland | Palestine | Uganda |
| Chile | Isle of Man | Panama | Ukraine |
| China | Israel | Papua New Guinea | United Arab Emirates |
| Christmas Island | Italy | Paraguay | United Kingdom |
| Clipperton | Jamaica | Peru | United States |
| Cocos (Keeling) Islands | Japan | Philippines | United States Minor Outlying Islands |
| Colombia | Jersey | Pitcairn Islands | Uruguay |
| Comoros | Jordan | Poland | US Virgin Islands |
| Congo | Kazakhstan | Portugal | Uzbekistan |
| Cook Islands | Kenya | Puerto Rico | Vanuatu |
| Costa Rica | Kiribati | Qatar | Vatican City |
| Côte d’Ivoire | Kosovo | Réunion | Venezuela |
| Croatia | Kuwait | Romania | Vietnam |
| Cuba | Kyrgyzstan | Russia | Wallis and Futuna |
| Curaçao | Laos | Rwanda | Western Sahara |
| Cyprus | Latvia | Saint Barthélemy | Yemen |
| Czechia | Lebanon | Saint Helena | Zambia |
| Democratic Republic of the Congo | Lesotho | Ascension and Tristan da Cunha | Zimbabwe |
| Denmark | Liberia | Saint Kitts and Nevis | |
| | | | Saint Lucia |

*Publication privacy settings*

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

General context

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

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

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

2. Please rate your level of agreement with the following general statements
### Justification and objectives

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

3. Questions on the risk of carbon leakage

3.1 In view of EU’s enhanced climate ambition the risk of carbon leakage is likely to:
- [ ] i. Increase
- [ ] ii. Remain unchanged
- [ ] iii. Decrease

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

<table>
<thead>
<tr>
<th>Statement</th>
<th>i. Strongly agree</th>
<th>ii. Somewhat agree</th>
<th>iii. Somewhat disagree</th>
<th>iv. Strongly disagree</th>
</tr>
</thead>
<tbody>
<tr>
<td>a. Carbon leakage is already a reality</td>
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<td>b. Current measures to address the risk of carbon leakage under the EU Emissions Trading System and State Aid Rules, such as free allocation of allowances and indirect cost compensation are effective in limiting the current risk of carbon leakage</td>
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<td>c. Current measures to address the risk of carbon leakage under the EU Emissions Trading System are sufficient in limiting the risk of carbon leakage even in view of the EU’s enhanced climate ambition</td>
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<td>d. A Carbon Border Adjustment Mechanism could be effective in addressing the risk of carbon leakage</td>
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<td>e. A Carbon Border Adjustment Mechanism can be effective in encouraging the deployment of less carbon intensive technologies and ambitious climate policies in partner countries</td>
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<td>f. A Carbon Border Adjustment Mechanism can lead to a change in consumption patterns in the EU, by making available the choice of less carbon intensive products</td>
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<td>g. Reducing greenhouse gas emissions can be better achieved through regulatory means such as performance standards for products placed on the EU market</td>
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</tbody>
</table>

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

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

<table>
<thead>
<tr>
<th>Policy Area</th>
<th>0</th>
<th>1</th>
<th>2</th>
<th>3</th>
<th>4</th>
<th>5</th>
</tr>
</thead>
<tbody>
<tr>
<td>Climate, notably the EU Emissions Trading System</td>
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<tr>
<td>Trade</td>
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<td></td>
<td>●</td>
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<tr>
<td>Energy taxation</td>
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<td>●</td>
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<tr>
<td>Development aid</td>
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<tr>
<td>Industry</td>
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<td>Research and innovation</td>
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<td>●</td>
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<tr>
<td>Circular economy</td>
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</tbody>
</table>

Questions targeted at expert stakeholders

The Carbon Border Adjustment Mechanism in detail

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

Design and coverage of the mechanism

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

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

- i. Highly relevant
- ii. Somewhat relevant
- iii. Not relevant
6.1.1. The option described in 6.1 will:

<table>
<thead>
<tr>
<th></th>
<th>i. Strongly agree</th>
<th>ii. Somewhat agree</th>
<th>iii. Neither agree or disagree</th>
<th>iv. Somewhat disagree</th>
<th>v. Strongly disagree</th>
</tr>
</thead>
<tbody>
<tr>
<td>a. Be effective in addressing the risk of carbon leakage</td>
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<tr>
<td>b. Impose little administrative burden on EU importers</td>
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<tr>
<td>c. Impose little administrative burden on exporters from partner countries</td>
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<tr>
<td>d. Be difficult to circumvent</td>
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</tbody>
</table>

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

○ i. Positive
● ii. Negative

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

● i. Highly relevant
○ ii. Somewhat relevant
○ iii. Not relevant

6.2.1. The option described in 6.2 will:

<table>
<thead>
<tr>
<th></th>
<th>i. Strongly agree</th>
<th>ii. Somewhat agree</th>
<th>iii. Neither agree or disagree</th>
<th>iv. Somewhat disagree</th>
<th>v. Strongly disagree</th>
</tr>
</thead>
<tbody>
<tr>
<td>a. Be effective in addressing the risk of carbon leakage</td>
<td>●</td>
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<tr>
<td>b. Impose little administrative burden on EU importers</td>
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<tr>
<td>c. Impose little administrative burden on exporters from partner countries</td>
<td>●</td>
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<tr>
<td>d. Be difficult to circumvent</td>
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</tbody>
</table>
6.2.2 The option described in 6.2 will have an impact on my activity. This impact will be:

- i. Positive
- ii. Negative

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

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

6.3.1. The option described in 6.3 will:

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

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

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

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

6.4.1 The option described in 6.4 will:

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

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

- i. Positive
- ii. Negative

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

1000 character(s) maximum

7. Please rate the proposals in the list below with regard to their relevance for the coverage of the Carbon Border Adjustment Mechanism
<table>
<thead>
<tr>
<th></th>
<th>i. Strongly agree</th>
<th>ii. Somewhat agree</th>
<th>iii. Neither agree or disagree</th>
<th>iv. Somewhat disagree</th>
<th>v. Strongly disagree</th>
</tr>
</thead>
<tbody>
<tr>
<td>a. The Carbon Border Adjustment Mechanism should cover not only direct emissions but also include indirect emissions that occurred in the production of the electricity used to produce the product</td>
<td></td>
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<td>b. Carbon Border Adjustment Mechanism should cover the emissions of the complete value chain, not only the emissions of the last stage of production before import into the EU</td>
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<tr>
<td>c. The Carbon Border Adjustment Mechanism should differentiate in the treatment of imports of finished products, intermediate products and primary inputs</td>
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<tr>
<td>d. Emissions from international transport of the goods covered should be taken into account by the Carbon Border Adjustment Mechanism</td>
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</tbody>
</table>

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

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

<table>
<thead>
<tr>
<th></th>
<th>i. Strongly agree</th>
<th>ii. Somewhat agree</th>
<th>iii. Somewhat disagree</th>
<th>iv. Strongly disagree</th>
</tr>
</thead>
<tbody>
<tr>
<td>a. Should focus on products from activities covered by the EU Emissions Trading System</td>
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<tr>
<td>b. Should focus on products from activities covered by the EU Emissions Trading System with highest risk of carbon leakage</td>
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<tr>
<td>c. Should not focus only on a product but address the relevant parts of value chains related to the product</td>
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</tbody>
</table>
8.2 Other important elements in the selection of sectors. Please specify:

450 character(s) maximum

A CBAM integrated with the EU ETS should therefore ensure full alignment of the CBAM with the existing energy and climate policy framework and carbon pricing in the EU

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

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

- A011 Growing of non-perennial crops
- A012 Growing of perennial crops
- A013 Plant propagation
- A014 Animal production
- A015 Mixed farming
- A016 Support activities to agriculture and post-harvest crop activities
- A017 Hunting, trapping and related service activities
- A021 Silviculture and other forestry activities
- A022 Logging
- A023 Gathering of wild growing non-wood products
- A024 Support services to forestry
- A031 Fishing
- A032 Aquaculture
- B051 Mining of hard coal
- B052 Mining of lignite
- B061 Extraction of crude petroleum
- B062 Extraction of natural gas
- B071 Mining of iron ores
- B072 Mining of non-ferrous metal ores
- B081 Quarrying of stone, sand and clay
- B089 Mining and quarrying n.e.c.
- B091 Support activities for petroleum and natural gas extraction
- B099 Support activities for other mining and quarrying
- C101 Processing and preserving of meat and production of meat products
- C102 Processing and preserving of fish, crustaceans and molluscs
C103 Processing and preserving of fruit and vegetables
C104 Manufacture of vegetable and animal oils and fats
C105 Manufacture of dairy products
C106 Manufacture of grain mill products, starches and starch products
C107 Manufacture of bakery and farinaceous products
C108 Manufacture of other food products
C109 Manufacture of prepared animal feeds
C110 Manufacture of beverages
C120 Manufacture of tobacco products
C131 Preparation and spinning of textile fibres
C132 Weaving of textiles
C133 Finishing of textiles
C139 Manufacture of other textiles
C141 Manufacture of wearing apparel, except fur apparel
C142 Manufacture of articles of fur
C143 Manufacture of knitted and crocheted apparel
C151 Tanning and dressing of leather; manufacture of luggage, handbags, saddlery and harness; dressing and dyeing of fur
C152 Manufacture of footwear
C161 Sawmilling and planing of wood
C162 Manufacture of products of wood, cork, straw and plaiting materials
C171 Manufacture of pulp, paper and paperboard
C172 Manufacture of articles of paper and paperboard
C181 Printing and service activities related to printing
C182 Reproduction of recorded media
C191 Manufacture of coke oven products
C192 Manufacture of refined petroleum products
C201 Manufacture of basic chemicals, fertilisers and nitrogen compounds, plastics and synthetic rubber in primary forms
C202 Manufacture of pesticides and other agrochemical products
C203 Manufacture of paints, varnishes and similar coatings, printing ink and mastics
C204 Manufacture of soap and detergents, cleaning and polishing preparations, perfumes and toilet preparations
C205 Manufacture of other chemical products
- C206 Manufacture of man-made fibres
- C211 Manufacture of basic pharmaceutical products
- C212 Manufacture of pharmaceutical preparations
- C221 Manufacture of rubber products
- C222 Manufacture of plastics products
- C231 Manufacture of glass and glass products
- C232 Manufacture of refractory products
- C233 Manufacture of clay building materials
- C234 Manufacture of other porcelain and ceramic products
- C235 Manufacture of cement, lime and plaster
- C236 Manufacture of articles of concrete, cement and plaster
- C237 Cutting, shaping and finishing of stone
- C239 Manufacture of abrasive products and non-metallic mineral products n.e.c.
- C241 Manufacture of basic iron and steel and of ferro-alloys
- C242 Manufacture of tubes, pipes, hollow profiles and related fittings, of steel
- C243 Manufacture of other products of first processing of steel
- C244 Manufacture of basic precious and other non-ferrous metals
- C245 Casting of metals
- C251 Manufacture of structural metal products
- C252 Manufacture of tanks, reservoirs and containers of metal
- C253 Manufacture of steam generators, except central heating hot water boilers
- C254 Manufacture of weapons and ammunition
- C255 Forging, pressing, stamping and roll-forming of metal; powder metallurgy
- C256 Treatment and coating of metals; machining
- C257 Manufacture of cutlery, tools and general hardware
- C259 Manufacture of other fabricated metal products
- C261 Manufacture of electronic components and boards
- C262 Manufacture of computers and peripheral equipment
- C263 Manufacture of communication equipment
- C264 Manufacture of consumer electronics
- C265 Manufacture of instruments and appliances for measuring, testing and navigation; watches and clocks
C266 Manufacture of irradiation, electromedical and electrotherapeutic equipment
C267 Manufacture of optical instruments and photographic equipment
C268 Manufacture of magnetic and optical media
C271 Manufacture of electric motors, generators, transformers and electricity distribution and control apparatus
C272 Manufacture of batteries and accumulators
C273 Manufacture of wiring and wiring devices
C274 Manufacture of electric lighting equipment
C275 Manufacture of domestic appliances
C279 Manufacture of other electrical equipment
C281 Manufacture of general-purpose machinery
C282 Manufacture of other general-purpose machinery
C283 Manufacture of agricultural and forestry machinery
C284 Manufacture of metal forming machinery and machine tools
C289 Manufacture of other special-purpose machinery
C291 Manufacture of motor vehicles
C292 Manufacture of bodies (coachwork) for motor vehicles; manufacture of trailers and semi-trailers
C293 Manufacture of parts and accessories for motor vehicles
C301 Building of ships and boats
C302 Manufacture of railway locomotives and rolling stock
C303 Manufacture of air and spacecraft and related machinery
C304 Manufacture of military fighting vehicles
C309 Manufacture of transport equipment n.e.c.
C310 Manufacture of furniture
C321 Manufacture of jewellery, bijouterie and related articles
C322 Manufacture of musical instruments
C323 Manufacture of sports goods
C324 Manufacture of games and toys
C325 Manufacture of medical and dental instruments and supplies
C329 Manufacturing n.e.c.
C331 Repair of fabricated metal products, machinery and equipment
C332 Installation of industrial machinery and equipment
D351 Electric power generation, transmission and distribution
D352 Manufacture of gas; distribution of gaseous fuels through mains
D353 Steam and air conditioning supply
E360 Water collection, treatment and supply
E370 Sewerage
E381 Waste collection
E382 Waste treatment and disposal
E383 Materials recovery
E390 Remediation activities and other waste management services

Sector 2. Please select from list (Level 3 NACE rev.2 excluding services)
A011 Growing of non-perennial crops
A012 Growing of perennial crops
A013 Plant propagation
A014 Animal production
A015 Mixed farming
A016 Support activities to agriculture and post-harvest crop activities
A017 Hunting, trapping and related service activities
A021 Silviculture and other forestry activities
A022 Logging
A023 Gathering of wild growing non-wood products
A024 Support services to forestry
A031 Fishing
A032 Aquaculture
B051 Mining of hard coal
B052 Mining of lignite
B061 Extraction of crude petroleum
B062 Extraction of natural gas
B071 Mining of iron ores
B072 Mining of non-ferrous metal ores
B081 Quarrying of stone, sand and clay
B089 Mining and quarrying n.e.c.
B091 Support activities for petroleum and natural gas extraction
B099 Support activities for other mining and quarrying
C101 Processing and preserving of meat and production of meat products
C102 Processing and preserving of fish, crustaceans and molluscs
C103 Processing and preserving of fruit and vegetables
C104 Manufacture of vegetable and animal oils and fats
C105 Manufacture of dairy products
C106 Manufacture of grain mill products, starches and starch products
C107 Manufacture of bakery and farinaceous products
C108 Manufacture of other food products
C109 Manufacture of prepared animal feeds
C110 Manufacture of beverages
C120 Manufacture of tobacco products
C131 Preparation and spinning of textile fibres
C132 Weaving of textiles
C133 Finishing of textiles
C139 Manufacture of other textiles
C141 Manufacture of wearing apparel, except fur apparel
C142 Manufacture of articles of fur
C143 Manufacture of knitted and crocheted apparel
C151 Tanning and dressing of leather; manufacture of luggage, handbags, saddlery and harness; dressing and dyeing of fur
C152 Manufacture of footwear
C161 Sawmilling and planing of wood
C162 Manufacture of products of wood, cork, straw and plaiting materials
C171 Manufacture of pulp, paper and paperboard
C172 Manufacture of articles of paper and paperboard
C181 Printing and service activities related to printing
C182 Reproduction of recorded media
C191 Manufacture of coke oven products
C192 Manufacture of refined petroleum products
C201 Manufacture of basic chemicals, fertilisers and nitrogen compounds, plastics and synthetic rubber in primary forms
C202 Manufacture of pesticides and other agrochemical products
C203 Manufacture of paints, varnishes and similar coatings, printing ink and mastics
C204 Manufacture of soap and detergents, cleaning and polishing preparations, perfumes and toilet preparations
C205 Manufacture of other chemical products
C206 Manufacture of man-made fibres
C211 Manufacture of basic pharmaceutical products
C212 Manufacture of pharmaceutical preparations
C221 Manufacture of rubber products
C222 Manufacture of plastics products
C231 Manufacture of glass and glass products
C232 Manufacture of refractory products
C233 Manufacture of clay building materials
C234 Manufacture of other porcelain and ceramic products
C235 Manufacture of cement, lime and plaster
C236 Manufacture of articles of concrete, cement and plaster
C237 Cutting, shaping and finishing of stone
C239 Manufacture of abrasive products and non-metallic mineral products n. e.c.
C241 Manufacture of basic iron and steel and of ferro-alloys
C242 Manufacture of tubes, pipes, hollow profiles and related fittings, of steel
C243 Manufacture of other products of first processing of steel
C244 Manufacture of basic precious and other non-ferrous metals
C245 Casting of metals
C251 Manufacture of structural metal products
C252 Manufacture of tanks, reservoirs and containers of metal
C253 Manufacture of steam generators, except central heating hot water boilers
C254 Manufacture of weapons and ammunition
C255 Forging, pressing, stamping and roll-forming of metal; powder metallurgy
C256 Treatment and coating of metals; machining
C257 Manufacture of cutlery, tools and general hardware
C259 Manufacture of other fabricated metal products
C261 Manufacture of electronic components and boards
C262 Manufacture of computers and peripheral equipment
C263 Manufacture of communication equipment
C264 Manufacture of consumer electronics
C265 Manufacture of instruments and appliances for measuring, testing and navigation; watches and clocks
C266 Manufacture of irradiation, electromedical and electrotherapeutic equipment
C267 Manufacture of optical instruments and photographic equipment
C268 Manufacture of magnetic and optical media
C271 Manufacture of electric motors, generators, transformers and electricity distribution and control apparatus
C272 Manufacture of batteries and accumulators
C273 Manufacture of wiring and wiring devices
C274 Manufacture of electric lighting equipment
C275 Manufacture of domestic appliances
C279 Manufacture of other electrical equipment
C281 Manufacture of general-purpose machinery
C282 Manufacture of other general-purpose machinery
C283 Manufacture of agricultural and forestry machinery
C284 Manufacture of metal forming machinery and machine tools
C289 Manufacture of other special-purpose machinery
C291 Manufacture of motor vehicles
C292 Manufacture of bodies (coachwork) for motor vehicles; manufacture of trailers and semi-trailers
C293 Manufacture of parts and accessories for motor vehicles
C301 Building of ships and boats
C302 Manufacture of railway locomotives and rolling stock
C303 Manufacture of air and spacecraft and related machinery
C304 Manufacture of military fighting vehicles
C309 Manufacture of transport equipment n.e.c.
C310 Manufacture of furniture
C321 Manufacture of jewellery, bijouterie and related articles
C322 Manufacture of musical instruments
C323 Manufacture of sports goods
C324 Manufacture of games and toys
C325 Manufacture of medical and dental instruments and supplies
C329 Manufacturing n.e.c.
C331 Repair of fabricated metal products, machinery and equipment
C332 Installation of industrial machinery and equipment
D351 Electric power generation, transmission and distribution
○ D352 Manufacture of gas; distribution of gaseous fuels through mains
○ D353 Steam and air conditioning supply
○ E360 Water collection, treatment and supply
○ E370 Sewerage
○ E381 Waste collection
○ E382 Waste treatment and disposal
○ E383 Materials recovery
○ E390 Remediation activities and other waste management services

Sector 3. Please select from list (Level 3 NACE rev.2 excluding services)
○ A011 Growing of non-perennial crops
○ A012 Growing of perennial crops
○ A013 Plant propagation
○ A014 Animal production
○ A015 Mixed farming
○ A016 Support activities to agriculture and post-harvest crop activities
○ A017 Hunting, trapping and related service activities
○ A021 Silviculture and other forestry activities
○ A022 Logging
○ A023 Gathering of wild growing non-wood products
○ A024 Support services to forestry
○ A031 Fishing
○ A032 Aquaculture
○ B051 Mining of hard coal
○ B052 Mining of lignite
○ B061 Extraction of crude petroleum
○ B062 Extraction of natural gas
○ B071 Mining of iron ores
○ B072 Mining of non-ferrous metal ores
○ B081 Quarrying of stone, sand and clay
○ B089 Mining and quarrying n.e.c.
○ B091 Support activities for petroleum and natural gas extraction
○ B099 Support activities for other mining and quarrying
○ C101 Processing and preserving of meat and production of meat products
○ C102 Processing and preserving of fish, crustaceans and molluscs
- C103 Processing and preserving of fruit and vegetables
- C104 Manufacture of vegetable and animal oils and fats
- C105 Manufacture of dairy products
- C106 Manufacture of grain mill products, starches and starch products
- C107 Manufacture of bakery and farinaceous products
- C108 Manufacture of other food products
- C109 Manufacture of prepared animal feeds
- C110 Manufacture of beverages
- C120 Manufacture of tobacco products
- C131 Preparation and spinning of textile fibres
- C132 Weaving of textiles
- C133 Finishing of textiles
- C139 Manufacture of other textiles
- C141 Manufacture of wearing apparel, except fur apparel
- C142 Manufacture of articles of fur
- C143 Manufacture of knitted and crocheted apparel
- C151 Tanning and dressing of leather; manufacture of luggage, handbags, saddlery and harness; dressing and dyeing of fur
- C152 Manufacture of footwear
- C161 Sawmilling and planing of wood
- C162 Manufacture of products of wood, cork, straw and plaiting materials
- C171 Manufacture of pulp, paper and paperboard
- C172 Manufacture of articles of paper and paperboard
- C181 Printing and service activities related to printing
- C182 Reproduction of recorded media
- C191 Manufacture of coke oven products
- C192 Manufacture of refined petroleum products
- C201 Manufacture of basic chemicals, fertilisers and nitrogen compounds, plastics and synthetic rubber in primary forms
- C202 Manufacture of pesticides and other agrochemical products
- C203 Manufacture of paints, varnishes and similar coatings, printing ink and mastics
- C204 Manufacture of soap and detergents, cleaning and polishing preparations, perfumes and toilet preparations
- C205 Manufacture of other chemical products
C206 Manufacture of man-made fibres
C211 Manufacture of basic pharmaceutical products
C212 Manufacture of pharmaceutical preparations
C221 Manufacture of rubber products
C222 Manufacture of plastics products
C231 Manufacture of glass and glass products
C232 Manufacture of refractory products
C233 Manufacture of clay building materials
C234 Manufacture of other porcelain and ceramic products
C235 Manufacture of cement, lime and plaster
C236 Manufacture of articles of concrete, cement and plaster
C237 Cutting, shaping and finishing of stone
C239 Manufacture of abrasive products and non-metallic mineral products n. e.c.
C241 Manufacture of basic iron and steel and of ferro-alloys
C242 Manufacture of tubes, pipes, hollow profiles and related fittings, of steel
C243 Manufacture of other products of first processing of steel
C244 Manufacture of basic precious and other non-ferrous metals
C245 Casting of metals
C251 Manufacture of structural metal products
C252 Manufacture of tanks, reservoirs and containers of metal
C253 Manufacture of steam generators, except central heating hot water boilers
C254 Manufacture of weapons and ammunition
C255 Forging, pressing, stamping and roll-forming of metal; powder metallurgy
C256 Treatment and coating of metals; machining
C257 Manufacture of cutlery, tools and general hardware
C259 Manufacture of other fabricated metal products
C261 Manufacture of electronic components and boards
C262 Manufacture of computers and peripheral equipment
C263 Manufacture of communication equipment
C264 Manufacture of consumer electronics
C265 Manufacture of instruments and appliances for measuring, testing and navigation; watches and clocks
C266 Manufacture of irradiation, electromedical and electrotherapeutic equipment
C267 Manufacture of optical instruments and photographic equipment
C268 Manufacture of magnetic and optical media
C271 Manufacture of electric motors, generators, transformers and electricity distribution and control apparatus
C272 Manufacture of batteries and accumulators
C273 Manufacture of wiring and wiring devices
C274 Manufacture of electric lighting equipment
C275 Manufacture of domestic appliances
C279 Manufacture of other electrical equipment
C281 Manufacture of general-purpose machinery
C282 Manufacture of other general-purpose machinery
C283 Manufacture of agricultural and forestry machinery
C284 Manufacture of metal forming machinery and machine tools
C289 Manufacture of other special-purpose machinery
C291 Manufacture of motor vehicles
C292 Manufacture of bodies (coachwork) for motor vehicles; manufacture of trailers and semi-trailers
C293 Manufacture of parts and accessories for motor vehicles
C301 Building of ships and boats
C302 Manufacture of railway locomotives and rolling stock
C303 Manufacture of air and spacecraft and related machinery
C304 Manufacture of military fighting vehicles
C309 Manufacture of transport equipment n.e.c.
C310 Manufacture of furniture
C321 Manufacture of jewellery, bijouterie and related articles
C322 Manufacture of musical instruments
C323 Manufacture of sports goods
C324 Manufacture of games and toys
C325 Manufacture of medical and dental instruments and supplies
C329 Manufacturing n.e.c.
C331 Repair of fabricated metal products, machinery and equipment
C332 Installation of industrial machinery and equipment
D351 Electric power generation, transmission and distribution
D352 Manufacture of gas; distribution of gaseous fuels through mains
D353 Steam and air conditioning supply
E360 Water collection, treatment and supply
E370 Sewerage
E381 Waste collection
E382 Waste treatment and disposal
E383 Materials recovery
E390 Remediation activities and other waste management services

Sector 4. Please select from list (Level 3 NACE rev.2 excluding services)
A011 Growing of non-perennial crops
A012 Growing of perennial crops
A013 Plant propagation
A014 Animal production
A015 Mixed farming
A016 Support activities to agriculture and post-harvest crop activities
A017 Hunting, trapping and related service activities
A021 Silviculture and other forestry activities
A022 Logging
A023 Gathering of wild growing non-wood products
A024 Support services to forestry
A031 Fishing
A032 Aquaculture
B051 Mining of hard coal
B052 Mining of lignite
B061 Extraction of crude petroleum
B062 Extraction of natural gas
B071 Mining of iron ores
B072 Mining of non-ferrous metal ores
B081 Quarrying of stone, sand and clay
B089 Mining and quarrying n.e.c.
B091 Support activities for petroleum and natural gas extraction
B099 Support activities for other mining and quarrying
C101 Processing and preserving of meat and production of meat products
C102 Processing and preserving of fish, crustaceans and molluscs
C103 Processing and preserving of fruit and vegetables
C104 Manufacture of vegetable and animal oils and fats
C105 Manufacture of dairy products
C106 Manufacture of grain mill products, starches and starch products
C107 Manufacture of bakery and farinaceous products
C108 Manufacture of other food products
C109 Manufacture of prepared animal feeds
C110 Manufacture of beverages
C120 Manufacture of tobacco products
C131 Preparation and spinning of textile fibres
C132 Weaving of textiles
C133 Finishing of textiles
C139 Manufacture of other textiles
C141 Manufacture of wearing apparel, except fur apparel
C142 Manufacture of articles of fur
C143 Manufacture of knitted and crocheted apparel
C151 Tanning and dressing of leather; manufacture of luggage, handbags, saddlery and harness; dressing and dyeing of fur
C152 Manufacture of footwear
C161 Sawmilling and planing of wood
C162 Manufacture of products of wood, cork, straw and plaiting materials
C171 Manufacture of pulp, paper and paperboard
C172 Manufacture of articles of paper and paperboard
C181 Printing and service activities related to printing
C182 Reproduction of recorded media
C191 Manufacture of coke oven products
C192 Manufacture of refined petroleum products
C201 Manufacture of basic chemicals, fertilisers and nitrogen compounds, plastics and synthetic rubber in primary forms
C202 Manufacture of pesticides and other agrochemical products
C203 Manufacture of paints, varnishes and similar coatings, printing ink and mastics
C204 Manufacture of soap and detergents, cleaning and polishing preparations, perfumes and toilet preparations
C205 Manufacture of other chemical products
C206 Manufacture of man-made fibres
C211 Manufacture of basic pharmaceutical products
C212 Manufacture of pharmaceutical preparations
C221 Manufacture of rubber products
C222 Manufacture of plastics products
C231 Manufacture of glass and glass products
C232 Manufacture of refractory products
C233 Manufacture of clay building materials
C234 Manufacture of other porcelain and ceramic products
C235 Manufacture of cement, lime and plaster
C236 Manufacture of articles of concrete, cement and plaster
C237 Cutting, shaping and finishing of stone
C239 Manufacture of abrasive products and non-metallic mineral products n. e.c.
C241 Manufacture of basic iron and steel and of ferro-alloys
C242 Manufacture of tubes, pipes, hollow profiles and related fittings, of steel
C243 Manufacture of other products of first processing of steel
C244 Manufacture of basic precious and other non-ferrous metals
C245 Casting of metals
C251 Manufacture of structural metal products
C252 Manufacture of tanks, reservoirs and containers of metal
C253 Manufacture of steam generators, except central heating hot water boilers
C254 Manufacture of weapons and ammunition
C255 Forging, pressing, stamping and roll-forming of metal; powder metallurgy
C256 Treatment and coating of metals; machining
C257 Manufacture of cutlery, tools and general hardware
C259 Manufacture of other fabricated metal products
C261 Manufacture of electronic components and boards
C262 Manufacture of computers and peripheral equipment
C263 Manufacture of communication equipment
C264 Manufacture of consumer electronics
C265 Manufacture of instruments and appliances for measuring, testing and navigation; watches and clocks
- C266 Manufacture of irradiation, electromedical and electrotherapeutic equipment
- C267 Manufacture of optical instruments and photographic equipment
- C268 Manufacture of magnetic and optical media
- C271 Manufacture of electric motors, generators, transformers and electricity distribution and control apparatus
- C272 Manufacture of batteries and accumulators
- C273 Manufacture of wiring and wiring devices
- C274 Manufacture of electric lighting equipment
- C275 Manufacture of domestic appliances
- C279 Manufacture of other electrical equipment
- C281 Manufacture of general-purpose machinery
- C282 Manufacture of other general-purpose machinery
- C283 Manufacture of agricultural and forestry machinery
- C284 Manufacture of metal forming machinery and machine tools
- C289 Manufacture of other special-purpose machinery
- C291 Manufacture of motor vehicles
- C292 Manufacture of bodies (coachwork) for motor vehicles; manufacture of trailers and semi-trailers
- C293 Manufacture of parts and accessories for motor vehicles
- C301 Building of ships and boats
- C302 Manufacture of railway locomotives and rolling stock
- C303 Manufacture of air and spacecraft and related machinery
- C304 Manufacture of military fighting vehicles
- C309 Manufacture of transport equipment n.e.c.
- C310 Manufacture of furniture
- C321 Manufacture of jewellery, bijouterie and related articles
- C322 Manufacture of musical instruments
- C323 Manufacture of sports goods
- C324 Manufacture of games and toys
- C325 Manufacture of medical and dental instruments and supplies
- C329 Manufacturing n.e.c.
- C331 Repair of fabricated metal products, machinery and equipment
- C332 Installation of industrial machinery and equipment
- D351 Electric power generation, transmission and distribution
D352 Manufacture of gas; distribution of gaseous fuels through mains
D353 Steam and air conditioning supply
E360 Water collection, treatment and supply
E370 Sewerage
E381 Waste collection
E382 Waste treatment and disposal
E383 Materials recovery
E390 Remediation activities and other waste management services

Sector 5. Please select from list  (Level 3 NACE rev.2 excluding services)
- A011 Growing of non-perennial crops
- A012 Growing of perennial crops
- A013 Plant propagation
- A014 Animal production
- A015 Mixed farming
- A016 Support activities to agriculture and post-harvest crop activities
- A017 Hunting, trapping and related service activities
- A021 Silviculture and other forestry activities
- A022 Logging
- A023 Gathering of wild growing non-wood products
- A024 Support services to forestry
- A031 Fishing
- A032 Aquaculture
- B051 Mining of hard coal
- B052 Mining of lignite
- B061 Extraction of crude petroleum
- B062 Extraction of natural gas
- B071 Mining of iron ores
- B072 Mining of non-ferrous metal ores
- B081 Quarrying of stone, sand and clay
- B089 Mining and quarrying n.e.c.
- B091 Support activities for petroleum and natural gas extraction
- B099 Support activities for other mining and quarrying
- C101 Processing and preserving of meat and production of meat products
- C102 Processing and preserving of fish, crustaceans and molluscs
• C103 Processing and preserving of fruit and vegetables
• C104 Manufacture of vegetable and animal oils and fats
• C105 Manufacture of dairy products
• C106 Manufacture of grain mill products, starches and starch products
• C107 Manufacture of bakery and farinaceous products
• C108 Manufacture of other food products
• C109 Manufacture of prepared animal feeds
• C110 Manufacture of beverages
• C120 Manufacture of tobacco products
• C131 Preparation and spinning of textile fibres
• C132 Weaving of textiles
• C133 Finishing of textiles
• C139 Manufacture of other textiles
• C141 Manufacture of wearing apparel, except fur apparel
• C142 Manufacture of articles of fur
• C143 Manufacture of knitted and crocheted apparel
• C151 Tanning and dressing of leather; manufacture of luggage, handbags, saddlery and harness; dressing and dyeing of fur
• C152 Manufacture of footwear
• C161 Sawmilling and planing of wood
• C162 Manufacture of products of wood, cork, straw and plaiting materials
• C171 Manufacture of pulp, paper and paperboard
• C172 Manufacture of articles of paper and paperboard
• C181 Printing and service activities related to printing
• C182 Reproduction of recorded media
• C191 Manufacture of coke oven products
• C192 Manufacture of refined petroleum products
• C201 Manufacture of basic chemicals, fertilisers and nitrogen compounds, plastics and synthetic rubber in primary forms
• C202 Manufacture of pesticides and other agrochemical products
• C203 Manufacture of paints, varnishes and similar coatings, printing ink and mastics
• C204 Manufacture of soap and detergents, cleaning and polishing preparations, perfumes and toilet preparations
• C205 Manufacture of other chemical products
C206 Manufacture of man-made fibres
C211 Manufacture of basic pharmaceutical products
C212 Manufacture of pharmaceutical preparations
C221 Manufacture of rubber products
C222 Manufacture of plastics products
C231 Manufacture of glass and glass products
C232 Manufacture of refractory products
C233 Manufacture of clay building materials
C234 Manufacture of other porcelain and ceramic products
C235 Manufacture of cement, lime and plaster
C236 Manufacture of articles of concrete, cement and plaster
C237 Cutting, shaping and finishing of stone
C239 Manufacture of abrasive products and non-metallic mineral products n. e.c.
C241 Manufacture of basic iron and steel and of ferro-alloys
C242 Manufacture of tubes, pipes, hollow profiles and related fittings, of steel
C243 Manufacture of other products of first processing of steel
C244 Manufacture of basic precious and other non-ferrous metals
C245 Casting of metals
C251 Manufacture of structural metal products
C252 Manufacture of tanks, reservoirs and containers of metal
C253 Manufacture of steam generators, except central heating hot water boilers
C254 Manufacture of weapons and ammunition
C255 Forging, pressing, stamping and roll-forming of metal; powder metallurgy
C256 Treatment and coating of metals; machining
C257 Manufacture of cutlery, tools and general hardware
C259 Manufacture of other fabricated metal products
C261 Manufacture of electronic components and boards
C262 Manufacture of computers and peripheral equipment
C263 Manufacture of communication equipment
C264 Manufacture of consumer electronics
C265 Manufacture of instruments and appliances for measuring, testing and navigation; watches and clocks
C266 Manufacture of irradiation, electromedical and electrotherapeutic equipment
C267 Manufacture of optical instruments and photographic equipment
C268 Manufacture of magnetic and optical media
C271 Manufacture of electric motors, generators, transformers and electricity distribution and control apparatus
C272 Manufacture of batteries and accumulators
C273 Manufacture of wiring and wiring devices
C274 Manufacture of electric lighting equipment
C275 Manufacture of domestic appliances
C279 Manufacture of other electrical equipment
C281 Manufacture of general-purpose machinery
C282 Manufacture of other general-purpose machinery
C283 Manufacture of agricultural and forestry machinery
C284 Manufacture of metal forming machinery and machine tools
C289 Manufacture of other special-purpose machinery
C291 Manufacture of motor vehicles
C292 Manufacture of bodies (coachwork) for motor vehicles; manufacture of trailers and semi-trailers
C293 Manufacture of parts and accessories for motor vehicles
C301 Building of ships and boats
C302 Manufacture of railway locomotives and rolling stock
C303 Manufacture of air and spacecraft and related machinery
C304 Manufacture of military fighting vehicles
C309 Manufacture of transport equipment n.e.c.
C310 Manufacture of furniture
C321 Manufacture of jewellery, bijouterie and related articles
C322 Manufacture of musical instruments
C323 Manufacture of sports goods
C324 Manufacture of games and toys
C325 Manufacture of medical and dental instruments and supplies
C329 Manufacturing n.e.c.
C331 Repair of fabricated metal products, machinery and equipment
C332 Installation of industrial machinery and equipment
D351 Electric power generation, transmission and distribution
D352 Manufacture of gas; distribution of gaseous fuels through mains
D353 Steam and air conditioning supply
E360 Water collection, treatment and supply
E370 Sewerage
E381 Waste collection
E382 Waste treatment and disposal
E383 Materials recovery
E390 Remediation activities and other waste management services

Sector 6. Please select from list (Level 3 NACE rev.2 excluding services)
- A011 Growing of non-perennial crops
- A012 Growing of perennial crops
- A013 Plant propagation
- A014 Animal production
- A015 Mixed farming
- A016 Support activities to agriculture and post-harvest crop activities
- A017 Hunting, trapping and related service activities
- A021 Silviculture and other forestry activities
- A022 Logging
- A023 Gathering of wild growing non-wood products
- A024 Support services to forestry
- A031 Fishing
- A032 Aquaculture
- B051 Mining of hard coal
- B052 Mining of lignite
- B061 Extraction of crude petroleum
- B062 Extraction of natural gas
- B071 Mining of iron ores
- B072 Mining of non-ferrous metal ores
- B081 Quarrying of stone, sand and clay
- B089 Mining and quarrying n.e.c.
- B091 Support activities for petroleum and natural gas extraction
- B099 Support activities for other mining and quarrying
- C101 Processing and preserving of meat and production of meat products
- C102 Processing and preserving of fish, crustaceans and molluscs
C103 Processing and preserving of fruit and vegetables
C104 Manufacture of vegetable and animal oils and fats
C105 Manufacture of dairy products
C106 Manufacture of grain mill products, starches and starch products
C107 Manufacture of bakery and farinaceous products
C108 Manufacture of other food products
C109 Manufacture of prepared animal feeds
C110 Manufacture of beverages
C120 Manufacture of tobacco products
C131 Preparation and spinning of textile fibres
C132 Weaving of textiles
C133 Finishing of textiles
C139 Manufacture of other textiles
C141 Manufacture of wearing apparel, except fur apparel
C142 Manufacture of articles of fur
C143 Manufacture of knitted and crocheted apparel
C151 Tanning and dressing of leather; manufacture of luggage, handbags, saddlery and harness; dressing and dyeing of fur
C152 Manufacture of footwear
C161 Sawmilling and planing of wood
C162 Manufacture of products of wood, cork, straw and plaiting materials
C171 Manufacture of pulp, paper and paperboard
C172 Manufacture of articles of paper and paperboard
C181 Printing and service activities related to printing
C182 Reproduction of recorded media
C191 Manufacture of coke oven products
C192 Manufacture of refined petroleum products
C201 Manufacture of basic chemicals, fertilisers and nitrogen compounds, plastics and synthetic rubber in primary forms
C202 Manufacture of pesticides and other agrochemical products
C203 Manufacture of paints, varnishes and similar coatings, printing ink and mastics
C204 Manufacture of soap and detergents, cleaning and polishing preparations, perfumes and toilet preparations
C205 Manufacture of other chemical products
C206 Manufacture of man-made fibres
C211 Manufacture of basic pharmaceutical products
C212 Manufacture of pharmaceutical preparations
C221 Manufacture of rubber products
C222 Manufacture of plastics products
C231 Manufacture of glass and glass products
C232 Manufacture of refractory products
C233 Manufacture of clay building materials
C234 Manufacture of other porcelain and ceramic products
C235 Manufacture of cement, lime and plaster
C236 Manufacture of articles of concrete, cement and plaster
C237 Cutting, shaping and finishing of stone
C239 Manufacture of abrasive products and non-metallic mineral products n. e.c.
C241 Manufacture of basic iron and steel and of ferro-alloys
C242 Manufacture of tubes, pipes, hollow profiles and related fittings, of steel
C243 Manufacture of other products of first processing of steel
C244 Manufacture of basic precious and other non-ferrous metals
C245 Casting of metals
C251 Manufacture of structural metal products
C252 Manufacture of tanks, reservoirs and containers of metal
C253 Manufacture of steam generators, except central heating hot water boilers
C254 Manufacture of weapons and ammunition
C255 Forging, pressing, stamping and roll-forming of metal; powder metallurgy
C256 Treatment and coating of metals; machining
C257 Manufacture of cutlery, tools and general hardware
C259 Manufacture of other fabricated metal products
C261 Manufacture of electronic components and boards
C262 Manufacture of computers and peripheral equipment
C263 Manufacture of communication equipment
C264 Manufacture of consumer electronics
C265 Manufacture of instruments and appliances for measuring, testing and navigation; watches and clocks
C266 Manufacture of irradiation, electromedical and electrotherapeutic equipment
C267 Manufacture of optical instruments and photographic equipment
C268 Manufacture of magnetic and optical media
C271 Manufacture of electric motors, generators, transformers and electricity distribution and control apparatus
C272 Manufacture of batteries and accumulators
C273 Manufacture of wiring and wiring devices
C274 Manufacture of electric lighting equipment
C275 Manufacture of domestic appliances
C279 Manufacture of other electrical equipment
C281 Manufacture of general-purpose machinery
C282 Manufacture of other general-purpose machinery
C283 Manufacture of agricultural and forestry machinery
C284 Manufacture of metal forming machinery and machine tools
C289 Manufacture of other special-purpose machinery
C291 Manufacture of motor vehicles
C292 Manufacture of bodies (coachwork) for motor vehicles; manufacture of trailers and semi-trailers
C293 Manufacture of parts and accessories for motor vehicles
C301 Building of ships and boats
C302 Manufacture of railway locomotives and rolling stock
C303 Manufacture of air and spacecraft and related machinery
C304 Manufacture of military fighting vehicles
C309 Manufacture of transport equipment n.e.c.
C310 Manufacture of furniture
C321 Manufacture of jewellery, bijouterie and related articles
C322 Manufacture of musical instruments
C323 Manufacture of sports goods
C324 Manufacture of games and toys
C325 Manufacture of medical and dental instruments and supplies
C329 Manufacturing n.e.c.
C331 Repair of fabricated metal products, machinery and equipment
C332 Installation of industrial machinery and equipment
D351 Electric power generation, transmission and distribution
D352 Manufacture of gas; distribution of gaseous fuels through mains
D353 Steam and air conditioning supply
E360 Water collection, treatment and supply
E370 Sewerage
E381 Waste collection
E382 Waste treatment and disposal
E383 Materials recovery
E390 Remediation activities and other waste management services

Sector 7. Please identify and indicate relevant Level 4 code from NACE rev. 2 Classification of Economic Activities in the European Community

5 character(s) maximum

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

5 character(s) maximum

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

5 character(s) maximum

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

5 character(s) maximum

Specific implementation issues

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

<table>
<thead>
<tr>
<th></th>
<th>i. Strongly agree</th>
<th>ii. Somewhat agree</th>
<th>iii. Somewhat disagree</th>
<th>iv. Strongly disagree</th>
</tr>
</thead>
<tbody>
<tr>
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<tr>
<td></td>
<td>i.</td>
<td>ii.</td>
<td>iii.</td>
<td>iv.</td>
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<td>---</td>
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</tr>
<tr>
<td>a. EU product benchmarks for free allocation under the Emissions Trading System, i.e. the greenhouse gases emitted during the production process</td>
<td></td>
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</tr>
<tr>
<td>b. Country of origin-specific product benchmarks to be defined for direct emissions</td>
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<tr>
<td>c. Global product benchmarks to be defined for direct emissions</td>
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<tr>
<td>d. EU emission factors to be defined for indirect emissions, i.e. the emissions caused by the generation of electricity used to produce the covered product</td>
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<tr>
<td>e. Country of origin-specific emission factors to be defined for indirect emissions</td>
<td></td>
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<td></td>
<td></td>
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<tr>
<td>f. Global emission factors to be defined for indirect emissions</td>
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<tr>
<td>g. A factor for both direct and indirect emissions taking into account the production method used in the installation were it was produced</td>
<td></td>
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<tr>
<td>h. A method that traces the build-up of emissions across the value chain of a product in different countries</td>
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</tr>
<tr>
<td>i. Giving importers the possibility to demonstrate in a verifiable manner how the product was manufactured</td>
<td></td>
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</tr>
</tbody>
</table>
j. The Commission Product Environmental Footprint method (which is in line with the international standard ISO 14067 and considers both direct and indirect impacts)

k. Product Environmental Footprint Category Rules developed based on the Commission Product Environmental Footprint method, which also include a benchmark reflecting average environmental performance

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

<table>
<thead>
<tr>
<th></th>
<th>Strongly agree</th>
<th>Somewhat agree</th>
<th>Somewhat disagree</th>
<th>Strongly disagree</th>
</tr>
</thead>
<tbody>
<tr>
<td>a. Be based on independent third party verification</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
</tr>
<tr>
<td>b. Allow for self-certification, supported by occasional external audit</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
</tr>
</tbody>
</table>

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

<table>
<thead>
<tr>
<th></th>
<th>i. Strongly agree</th>
<th>ii. Somewhat agree</th>
<th>iii. Somewhat disagree</th>
<th>iv. Strongly disagree</th>
</tr>
</thead>
<tbody>
<tr>
<td>Provided that it is necessary to achieve the objective of reducing the risk of carbon leakage, the possibility to grant a rebate to EU exporters should be explored under the Carbon Border Adjustment Mechanism</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
</tr>
</tbody>
</table>

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

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

<table>
<thead>
<tr>
<th></th>
<th>i. Strongly agree</th>
<th>ii. Somewhat agree</th>
<th>iii. Somewhat disagree</th>
<th>iv. Strongly disagree</th>
</tr>
</thead>
<tbody>
<tr>
<td>a. Substitution between primary inputs and semi-finished goods</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
</tr>
<tr>
<td>b. Resource shuffling in the form allocating low carbon production only to the EU with no or negative effect to the overall CO2 emissions</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
</tr>
</tbody>
</table>
c. Transhipment strategies if the possibility for exempted countries is included

d. Avoidance based on slight modification of the product

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

250 character(s) maximum

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

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

<table>
<thead>
<tr>
<th></th>
<th>i. Strongly agree</th>
<th>ii. Somewhat agree</th>
<th>iii. Somewhat disagree</th>
<th>iv. Strongly disagree</th>
</tr>
</thead>
<tbody>
<tr>
<td>a. Should not allow for any exemptions. All imports should be subject to a carbon border adjustment mechanism equally no matter where they came from</td>
<td></td>
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<tr>
<td>b. Should allow for exemptions for least developed countries</td>
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<tr>
<td>c. If a partner country has climate policies creating sufficient incentives for emission reductions, similarly to the EU for the products in scope then no Carbon Border Adjustment should be levied (relevant policies could include national or regional emissions trading system, carbon tax, or regulatory system in relevant sectors at home)</td>
<td></td>
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<tr>
<td>d. If a partner country has climate policies creating sufficient incentives for emission reductions which result in higher carbon costs than in the EU for the products in scope, then the Carbon Border Adjustment should result in a credit for the importer for the difference in carbon cost</td>
<td></td>
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</tbody>
</table>
14.2 Other considerations on scope and exemptions not covered by 14.1 above. Please specify:

*250 character(s) maximum*

If a third country has an ETS linked to the EU ETS, the CBAM should not be levied; this approach would further support the expansion of the EU ETS at a global scale.

**Potential impacts**

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

15. Please indicate if you agree with the following statement

**15.1 Economic impacts**

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

<table>
<thead>
<tr>
<th>15.2 Environmental impacts</th>
<th>i. Strongly agree</th>
<th>ii. Somewhat agree</th>
<th>iii. Somewhat disagree</th>
<th>iv. Strongly disagree</th>
</tr>
</thead>
<tbody>
<tr>
<td>a. The Carbon Border Adjustment Mechanism would improve the effectiveness of policies aimed at fighting climate change in the EU</td>
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<tr>
<td>b. The Carbon Border Adjustment Mechanism would be effective in reducing carbon emissions globally</td>
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<tr>
<td>c. The Carbon Border Adjustment Mechanism would promote the adoption of similarly ambitious climate policies by our trading partners and thus contribute to the reduction of global emissions</td>
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<thead>
<tr>
<th>15.3 Social impacts</th>
<th>i. Strongly agree</th>
<th>ii. Somewhat agree</th>
<th>iii. Somewhat disagree</th>
<th>iv. Strongly disagree</th>
</tr>
</thead>
<tbody>
<tr>
<td>a. The Carbon Border Adjustment Mechanism would avoid job losses in the EU due to the substitution of EU production by production from partner countries with lower climate ambition.</td>
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<tr>
<td>b. Depending on the sectors covered, the Carbon Border Adjustment Mechanism, as part of a broader climate policy, would increase the price of consumer products including those related to basic needs.</td>
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<tr>
<td>c. The Carbon Border Adjustment Mechanism would have negative effects in terms of jobs in sectors downstream from those to which it applies by increasing the cost of their inputs, which their competitors in partner countries do not bear.</td>
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<tr>
<td>d. Potential negative effects on the living standards of the poorer segments of the population should be compensated</td>
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</tbody>
</table>
15.4 Administrative impacts

a. The Carbon Border Adjustment Mechanism would increase the administrative burden for exporters and importers into the EU
   - i. Yes
   - ii. No

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

b. The Carbon Border Adjustment Mechanism is likely to increase the administrative burden for public administrations in the EU
   - i. Yes
   - ii. No

Due to:
- i. Monitoring needs
- ii. Adjustment of customs systems

c. The Carbon Border Adjustment Mechanism is likely to result in higher administrative burden for SMEs
   - i. Yes
   - ii. No

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

1000 character(s) maximum

The economic and social impact of CBAM will ultimately depend on the CBAM design option, which will be adopted. The CBAM should be limited to CO2-emissions and not be extended to other environmental policies or other policy goals. Otherwise, there is a risk that international trade will fall victim to foreign policy considerations; it would also increase the risk of the CBAM being challenged under WTO rules.

Final remarks

Should you wish to provide additional information (for example a position paper) or raise specific points not covered by the questionnaire, you can upload your additional document here.
Please note that the uploaded document will be published alongside your response to the questionnaire which is the essential input to this open public consultation. The document is an optional complement and serves as additional background reading to better understand your position.
Please upload your file

The maximum file size is 1 MB
Only files of the type pdf, txt, doc, docx, odt, rtf are allowed

Please provide your hyperlinks