

Comments on the National Energy Technology Laboratory Request for Information Regarding the Carbon Border Adjustment Mechanism Study

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U.S. Department of Energy
National Energy Technology Laboratory

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The Business Council for Sustainable Energy (BCSE) respectfully submits these comments in response to the National Energy Technology Laboratory's (NETL) Request for Information regarding the Carbon Border Adjustment Mechanism (CBAM) Study.

BCSE is a broad-based coalition of companies and trade associations representing the energy efficiency, natural gas, and renewable energy sectors. The Council advocates for policies that expand deployment of clean energy technologies, strengthen U.S. energy security, support economic growth, and reduce emissions through market-based and technology-neutral approaches. BCSE appreciates the opportunity to provide input on this important study.

The NETL study presents a significant opportunity to provide objective, data-driven analysis of the emissions performance of U.S. industry relative to international competitors. As countries increasingly adopt carbon border adjustment policies and other trade measures that incorporate emissions intensity into market access and competitiveness considerations, it is essential that policymakers, manufacturers, and trading partners have access to accurate and credible information regarding the emissions performance of U.S.-produced goods.

The United States has a well-documented carbon advantage across many industrial sectors. American manufacturers frequently produce goods with lower emissions intensity than comparable products manufactured in other countries due to a combination of advanced technologies, efficient industrial processes, cleaner energy systems, and strong environmental standards. Independent analyses have found that U.S. manufacturers often produce goods at substantially lower emissions intensity than global averages and significantly lower emissions intensity than many major exporting countries.

Accurately documenting this performance is increasingly important as the European Union's CBAM and similar policies adopted or under consideration in other jurisdictions begin to affect global trade flows. The assignment of default emissions values that do not accurately reflect actual U.S. production conditions risks disadvantaging American manufacturers and undermining U.S. competitiveness in international markets. A rigorous assessment of emissions intensity can help ensure that U.S. products receive fair treatment under emerging international carbon-related trade measures.

BCSE therefore supports NETL's efforts to examine and compare the average emissions intensity of covered goods produced in the United States and abroad. The study should provide



policymakers with robust analytical tools to evaluate claims regarding emissions performance and should help establish an objective basis for comparing products across jurisdictions.

The timing of this effort is particularly important. The European Union's CBAM has entered implementation, and several additional jurisdictions, including the United Kingdom, Norway, and Taiwan, are advancing similar border adjustment frameworks. Other major trading partners are actively evaluating comparable policies. As these measures become more widespread, accurate information regarding emissions intensity will become increasingly important to maintaining the competitiveness of U.S. exports.

To maximize its value, BCSE recommends that the NETL study:

- Clearly identify and quantify emissions intensity differences between U.S.-produced goods and comparable products produced in other countries.
- Utilize methodologies that enable consistent comparisons across sectors and jurisdictions while maintaining analytical rigor and transparency.
- Provide results that can be used by manufacturers and policymakers to assess the implications of international CBAM policies and respond to inaccurate emissions assumptions applied to U.S. products.
- Remain responsive to congressional direction to evaluate the average emissions intensity of covered goods produced in the United States compared with those produced internationally.
- Consider the value of economy-wide and sector-specific emissions intensity analyses that draw upon reported emissions, production, and trade data to facilitate cross-country comparisons.
- Where appropriate, complement top-down emissions intensity analysis with product-level and process-based emissions measurement approaches that may be useful for company-specific CBAM compliance and reporting requirements.

BCSE believes the study can play an important role in documenting the environmental performance of American industry and informing future trade and competitiveness discussions. Accurate measurement and transparent analysis will help ensure that international carbon-related trade policies appropriately recognize lower-emissions U.S. production and support fair competition in global markets.

Thank you for the opportunity to provide these comments. BCSE appreciates NETL's work on this important initiative and looks forward to continued engagement as the study progresses. Please contact [Lisa Jacobson](#), BCSE President, with any questions regarding this submission