



ROYAL NORWEGIAN MINISTRY OF
CLIMATE AND ENVIRONMENT

The Minister

Commissioner for Climate,
Net Zero and Clean Growth,
Mr Wopke Hoekstra

Your ref

Our ref

Date

25 September 2025

Call for evidence concerning three Commission Implementing Regulations laying down rules for the application of CBAM

Norway refers to the public consultation from the European Commission, with a deadline for replies on 25 September 2025. The Norwegian government presents its views through this letter.

The initiative includes three implementing acts to be adopted by the Commission before the definitive regime begins: rules on the methodology for calculating emissions embedded in CBAM goods, rules on the adjustment of CBAM certificates to reflect the EU ETS free allocation and rules on the deduction of the carbon price paid in a third country.

It is positive that the implementing act on methodology builds on lessons learned during the transitional period. Norway has not participated in that period and has therefore not gathered experience regarding the methodology applied during this period. However, we do have views on how to determine embedded indirect emissions and the embedded emissions for electricity, to ensure that the regulation function as intended. The latter was also addressed in the Norwegian reply to the Commission's call for evidence concerning extension of downstream products, additional anti-circumvention measures and rules for the electricity sector in August.

For the cement and fertilizer sectors, where indirect emissions are included in CBAM, default values should be set so that CBAM can serve the same purpose as the Indirect Cost Compensation. This is important to ensure a level playing field across sectors that are covered in the EU ETS and CBAM. The Norwegian electricity sector is already largely renewable, and scope 2 emissions from Norwegian industries are therefore very low.

However, due to interconnections with the European power market and energy grid, CO₂ costs incurred from the EU ETS affect Norwegian electricity prices.

Regarding the rules for determining embedded emissions for electricity, we believe it is important to ensure that standard emission factors from electricity production in a third country are calculated consistently for all imports of electricity from that country or bidding zone. We also believe the rules should provide a clear incentive for third countries to decarbonize their energy sectors.

Concerning the implementing act on free allocation, it is important to ensure that CBAM benchmarks are identical to the benchmarks applied under the EU ETS. Given that many products eligible of free allocation do not have an attributed product benchmark, it is important to develop thorough, consistent and accurate methodologies that allow for harmonised benchmarks across the EU ETS and CBAM.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'A. B. Eriksen'. The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

Andreas Bjelland Eriksen