



ROYAL NORWEGIAN MINISTRY OF  
CLIMATE AND ENVIRONMENT

*The Minister*

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

Your ref

Our ref  
25/3209-

Date  
26 August 2025

**Call for evidence concerning extension of downstream products,  
additional anti-circumvention measures and rules for the electricity  
sector - CBAM**

Norway refers to the public consultation from the European Commission, with a deadline for replies on 26 August 2025. The Norwegian government presents its views through this letter.

Much of the Norwegian industry consists of energy intensive industries that utilize renewable power to produce critical or strategic materials such as primary aluminum, ferroalloys, silicon metal and other materials. Since the Norwegian electricity sector is already mostly renewable, this results in very low lifecycle emissions compared to many international competitors. Norway acknowledges that these industries face significant barriers to decarbonization, including risk of carbon leakage and unfair competition, and welcomes initiatives proposed by the Commission. It is crucial to maintain the competitiveness of industries with hard-to-abate emissions through the green transition.

Closing loopholes in the CBAM Regulation is important for the mechanism to function as intended and to serve its purpose as a measure to prevent carbon leakage. It would therefore be beneficial if as many downstream products as possible are included. Downstream production that is not included bears the risk of losing market share or moving out of the region. This can in turn affect upstream producers, who to a large degree supply downstream producers in the region.

At the same time, we recognize that it can be difficult to draw a clear line between which downstream products that should be included or not. In general, we find that commercial

products where the price of the product is highly dependent on the price of goods listed in Annex I of the CBAM Regulation should be especially considered included.

We recognize the possibility of circumvention of the regulation. Some possibilities of circumvention could be solved by extending the scope. An example is including process scrap in the aluminium sector and in general including possible substitutes. Rules for emissions reporting, standard factors and how reporting is reviewed could also play an important role to prevent circumvention. As it is difficult to foresee all possible ways of circumvention ahead of implementation there should be an ongoing effort to identify and eliminate possibilities.

When it comes to the rules for calculating emissions from the electricity sector, we believe the most important issue is to ensure that standard factors for emissions from electricity production in a third country are calculated consistently for all importers 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.

Yours sincerely

A handwritten signature in blue ink that reads "A.B. Eriksen" followed by a stylized flourish.

Andreas Bjelland Eriksen