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Is CBAM a Sign of Green Protectionism?

A Perspective from Türkiye

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EXECUTIVE SUMMARY

From Türkiye's perspective, the European Union's Carbon Border Adjustment Mechanism (CBAM) carries several risks associated with green protectionism. The issue is not whether the carbon content of imports should be priced. The concern is that a legitimate carbon charge may still tilt competition in favor of European producers if exporters cannot get lower emissions recognized or face excessive verification costs. Unequal access to transition finance can compound these adjustment pressures. These risks are particularly consequential in a trade relationship built on deeply integrated industrial supply chains.

CBAM can reinforce climate policy by reducing the incentive to substitute European production with more carbon-intensive imports. A decline in Turkish sales may therefore reflect a legitimate difference in carbon costs rather than protectionism. The problem arises when that advantage can no longer be credibly defended on environmental grounds or extends beyond what is necessary to curb carbon leakage. This paper applies that two-part test to implementation rules, differences in production, and firms' capacity to adjust.

The clearest protectionist risks emerge in the way emissions are calculated and verified, and in whether firms can realistically afford to adjust. Türkiye's substantial electric-furnace steel production creates opportunities to compete on emissions performance, provided that installation-level records receive effective recognition. Conservative defaults can instead reward administrative capacity. Domestic carbon pricing can reduce the border obligation where an eligible carbon price has been paid. Türkiye's reporting-only ETS pilot in 2026, however, creates no such payment.

Interdependence creates shared interests but uneven bargaining power. Turkish exporters depend heavily on European demand, while EU producers, importers, and downstream manufacturers have different priorities. Bilateral cooperation should preserve viable low-emission supply, improve access to verification, and support

investments suited to each production route. Türkiye should prioritize plant data and credible carbon-price sequencing. The EU should keep defaults rebuttable and credit eligible foreign payments consistently.

A joint program should be judged by verified emissions reductions, accessible verification, and finance delivered to projects.

> *Protectionist risk lies in the gap between the formal right to demonstrate performance and the practical ability to exercise that right.*

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I The Policy Problem

CBAM's definitive regime began on January 1, 2026. The first annual declaration and certificate surrender for 2026 imports are due by September 30, 2027. The assessment therefore concerns legal design, preparation, and early adjustment. Evaluating realized annual payments and causal effects on global emissions, employment, and welfare will require a longer observation period.[1] The central question is how to prevent unnecessary trade barriers while preserving a credible climate instrument. This paper assesses economic justification, without determining WTO compatibility. As Sinan Ülgen has argued, a border carbon policy's political economy depends on the capacity to measure emissions and finance cleaner production, as well as its formal rules.[2] For Türkiye, these issues carry particular weight. Its close integration with European industry makes successful adjustment valuable, while exclusion would impose costs on both sides.

II When Does a Carbon Border Measure Become Protectionist?

The relevant benchmark is an equally stringent EU climate policy without CBAM. Judging CBAM against a scenario in which the EU imposes no carbon constraint would wrongly treat legitimate climate costs as protectionism. Without a border measure, higher European carbon prices could push demand toward imports and shift emissions abroad. OECD modeling finds that CBAM can curb this leakage, although it only partly offsets competitive pressures on covered EU industries and may raise costs for downstream producers.[3] These estimates are most useful as a guide to what should be examined during the early years of implementation. CBAM currently covers specified goods in iron and steel, aluminum, cement, fertilizers, electricity, and hydrogen. Coverage follows the product codes in Annex I to Regulation (EU) 2023/956, rather than entire industrial sectors. Its design links the import charge to the EU Emissions Trading System (EU ETS) and permits deductions for eligible carbon prices effectively paid abroad. The 50-tonne annual threshold applies at importer

level across the four covered material sectors. It is not a general exemption for small foreign producers, and it does not apply to electricity or hydrogen.[4] Free allocation complicates comparisons. EU producers still receive benchmark-based allowances as CBAM is introduced. The border obligation must therefore be adjusted for the corresponding free allocation. Under the enacted schedule, the remaining allocation factor is 97.5 percent in 2026 and falls to zero in 2034. This does not mean that every importer pays on only 2.5 percent of its emissions in 2026. The adjustment depends on the relevant benchmark and production route. Emissions above the adjusted benchmark can already generate a substantial obligation. The fair comparison is between effective carbon burdens for comparable production, not between nominal carbon prices.[5]

The decision rule asks two questions. First, does the measure confer a material competitive advantage on EU producers after comparable carbon obligations have been taken into account? Second, does that advantage lack a reasonable environmental justification, or exceed what is proportionate to the risk of carbon leakage? Protectionist excess requires an affirmative answer to both. A necessary and proportionate advantage satisfies only the first condition; incomplete information leaves the assessment indeterminate.

Four dimensions help apply this rule. Climate integrity depends on whether CBAM limits leakage and rewards lower emissions. Competitive parity is harder to judge. What matters is the carbon cost firms really bear and whether exporters can prove their actual performance rather than rely on punitive defaults. Adjustment concerns the distribution of costs and access to investment. Geoeconomic leverage concerns whether access to the EU market pressures partners to adopt European policy choices without adequate avenues for cooperation. Adjustment gaps and EU regulatory influence can create vulnerabilities, but neither is enough on its own to show that CBAM is protectionist.

Consider two contrasting applications. A charge on accurately measured emissions that accounts for comparable EU free allocation and a foreign carbon payment can be justified even if an exporter loses sales. Conversely, an exporter that can demonstrate lower emissions but is forced to use an unnecessarily high default may face a cost

unrelated to its actual climate performance. If this creates a material EU advantage and an equally reliable, less restrictive verification route is available, both conditions are satisfied.

How continued EU free allocation is treated is an important test of parity. Because CBAM is designed to phase in as free allocation phases out, the relevant question is whether the free-allocation adjustment prevents overlapping protection in practice. Evidence that EU producers retain a material advantage after that adjustment would require separate justification. Cooperative carbon pricing offers an alternative, although it requires credible institutions and negotiated arrangements. The policy objective should be to achieve the climate result with the least unnecessary restriction on trade.

III Türkiye's Exposure and Early Adjustment

Steel: Dependence, Production Routes, and Bargaining Power

CBAM-specific trade data reveal substantial but uneven reliance on the EU. A 2025 Central Bank of Türkiye study, matching customs records to covered products, reports $9.742 billion in EU-bound exports out of $23.330 billion worldwide in 2023: an EU destination share of 41.8 percent. The shares were 38.7 percent for covered iron and steel and 59 percent for aluminum. These ratios measure exporters' reliance on European buyers. Subsequent central-bank assessment places covered goods at 10.1 percent of Türkiye's EU exports in January–November 2025; this different denominator measures their concentration within EU-bound trade.[6] On the EU side, Türkiye supplied 4.815 million tonnes of finished steel in 2025, or 16.2 percent of extra-EU finished-steel imports. That volume was equivalent to approximately 3.6 percent of EU apparent steel consumption of 134.412 million tonnes. This indicative ratio uses EUROFER's statistical definitions, rather than a matched CBAM product basket; apparent consumption also reflects inventory changes. The EU-side figures refer to 2025, whereas the Turkish reliance figures above refer to 2023, so the two sets are

indicative rather than directly comparable. It qualifies claims of aggregate EU dependence. Aggregate figures can also hide dependence at the firm level. Some European buyers may have few immediate alternatives because switching suppliers takes time or requires new technical qualifications.[7]

Production routes make a uniform national assessment misleading. In 2024, electric furnaces accounted for 70 percent of Türkiye's crude steel output, compared with 44.4 percent in the EU. These national production shares encompass different electric-furnace technologies. Shipment-level emissions assessments require the actual route and inputs used by the supplying installation.[8] A scrap-based electric arc furnace can have much lower direct emissions than a blast furnace–basic oxygen furnace installation. Yet the benefit depends on the actual inputs, process boundaries, and treatment of precursors. Electric furnaces using substantial primary iron inputs cannot automatically be treated as equivalent to scrap-based production. Integrated Turkish steelworks face a different transition problem, involving large investments in ironmaking, access to suitable feedstock, and the eventual availability of low-emission energy. Product codes alone do not resolve these differences.[9] These distinctions favor a plant- and product-level assessment of Türkiye's position. Cleaner installations can compete on verified performance, while more carbon-intensive producers face a substantial transition. Taken together, the trade and production indicators suggest asymmetric interdependence: the EU sets access conditions for an important export market, while Türkiye's bargaining position rests on specific supply relationships and the availability of competitive low-emission capacity.

The authorized EU declarant bears the legal CBAM obligation; its economic incidence depends on contracts, alternative suppliers, and cost pass-through. European interests differ accordingly. EUROFER seeks stronger leakage protection for steel producers. EUROMETAL emphasizes workable compliance and supply security for distributors and importers. Orgalim warns that dearer steel and aluminum inputs weaken downstream manufacturers' competitiveness. These positions suggest a basis for Turkish cooperation with European buyers around reliable low-emission supply. But trade shares alone do not show how much leverage Turkish suppliers have. That also depends on price, available alternatives, and how quickly European buyers can qualify a new supplier.[10]

Ankara's economic reform program identifies competitiveness pressures, complex green rules affecting the free circulation of goods, limited smaller-firm readiness, and insufficient transition finance. These concerns identify where adjustment can become costly. Applying the two-part test requires determining whether those costs confer a material EU advantage and whether a proportionate, environmentally reliable alternative is available.[11]

Carbon Pricing and the Ability to Prove Emissions

Türkiye has moved beyond announcing an ETS; the Climate Law adopted in July 2025 provides its legal basis. The Carbon Market Board's September 3, 2026 decision places specified installations in electricity, cement, iron and steel, aluminum, and fertilizers in a 2026–2027 pilot. The 2026 system year entails reporting only. Pricing begins in 2027, with free allocation at 100 percent of the pilot benchmark. Because CBAM recognizes only an eligible carbon price effectively paid, free allocation will limit the deductible amount where it reduces an installation's net carbon payment. Under Türkiye's benchmark-based system, however, installations emitting above their allocation may still incur a payment in 2027; the size of any CBAM deduction will therefore vary across installations. For 2026, the pilot provides reporting records; a deductible amount requires an eligible carbon payment.[12] Under CBAM, recognition concerns an eligible carbon price effectively paid for the relevant embedded emissions, accounting for rebates and compensation. The claim must be documented. A Turkish ETS can retain carbon revenue domestically and support adjustment, but only payments meeting the EU rules can reduce the border obligation. Nor does recognition of payments automatically produce an exemption. Full exemption through an ETS linkage is a separate, more demanding institutional undertaking.[13]

Verification is therefore the first practical test of parity. A low-emission producer needs a usable route from installation records to an accepted CBAM emissions report. This requires consistent boundaries, reliable precursor data, qualified verification, and protection of commercially sensitive information. Fixed compliance costs can weigh particularly heavily on firms with small export volumes. The importer threshold reduces some administrative burdens, but an exporter supplying a large EU

buyer may still need the full supporting evidence. Defaults reveal the stakes. In the Commission's August 2026 workbook, Türkiye lacks a specific default for other clinker, including gray clinker. The corresponding other-country default is 1.410 tonnes of CO_2 equivalent per tonne. With the prescribed 2026 cement markup of 10 percent, this becomes 1.551 before the free-allocation adjustment and any eligible carbon-price deduction. The figure is only a regulatory default. It does not show the actual emissions of a Turkish plant or the final CBAM cost it would face. A valid liability comparison requires the actual product, route, benchmark, emissions, and applicable certificate price.[14]

Conservative estimation can prevent underreporting. Its environmental justification weakens if a producer with reliable lower emissions lacks realistic access to verification. A resulting material advantage for EU competitors would satisfy the first condition. Withholding an equally reliable and less burdensome verification route would satisfy the second. The mechanism identifies a specific implementation risk whose prevalence should be assessed through consignment-level records and verification outcomes.

The rules provide an important safeguard. Verification bodies established outside the EU may apply to an EU national accreditation body. Eligibility depends on accreditation under CBAM rules, not on where the verifier is established. The reported June 2026 cooperation agreement between TÜRKAK and the Dutch Accreditation Council offers a route to build capacity. Its practical reach should be assessed through provider availability, turnaround times, and verification costs.[15] This produces a focused Turkish negotiating position: require workable access to actual-emissions treatment, clear accreditation procedures, consistent decisions, and a way to correct demonstrable errors. A blanket exemption would weaken the environmental benchmark. Removing unnecessary obstacles to reliable evidence would strengthen it. Protectionist risk lies in the gap between the formal right to demonstrate performance and the practical ability to exercise that right.

Investment, Other Sectors, and Mutual Interests

Financing conditions matter for adjustment, but higher borrowing costs do not by themselves make CBAM protectionist. European industrial decarbonization receives substantial public support. In 2023, for example, the Commission approved a €550 million German grant and up to €1.45 billion in conditional support for thyssenkrupp's steel transition. Assessing the competitive effect of such support requires distinguishing approved assistance from disbursement and examining the recipient's net obligations.[16]

The broader competitive issue is the combined effect of CBAM, free allowances, and public support. Together, do they protect EU producers more than climate policy requires? Investment aid can enable additional emissions reductions while altering competition. To answer that question, comparable EU and Turkish plants need to be assessed side by side, including the support they receive, the carbon costs they face, and the emissions reductions they deliver.

Türkiye's Industrial Decarbonisation Investment Platform brings its government and development banks together around steel, cement, aluminum, and fertilizers. The EBRD identifies a target of more than €5 billion in projects under implementation by 2030, alongside technical assistance and concessional finance. The distinction between this target and delivered finance matters: factories must secure investment before they can demonstrate lower emissions.[17]

Other sectors sharpen the analysis. Cement combines unavoidable process emissions from calcination with fuel and electricity emissions. Lower clinker ratios, alternative materials, efficiency, and eventually carbon capture address different parts of that burden. The default-value problem is especially consequential for a low-value, heavy product. Its resolution requires reliable installation evidence, rather than substituting an industry-wide average for particular EU-bound goods.

Aluminum presents a different issue. CBAM currently counts only direct embedded emissions for aluminum, iron and steel, and hydrogen, while cement and fertilizers also face indirect-emissions accounting. Cleaner electricity therefore remains important to industrial decarbonization and competitiveness, but it does not

automatically lower the present CBAM obligation for aluminum or steel. For fertilizers, the mix of ammonia-related emissions, electricity, and, where relevant, nitrous oxide requires its own calculation. A steel investment strategy cannot simply be transferred to these sectors.[18]

A 2026 World Bank study of the 2021 CBAM announcement, using data on Turkish manufacturing firms through 2023, estimates that a one-standard-deviation increase in prior exposure is associated with 3.2 percent lower CBAM-product exports to the EU and 5.5 percent higher exports elsewhere. More exposed firms were also less likely to source green investment inputs. Their imported-input purchases were relatively lower, while domestic purchase values exhibited no robust difference. The finding points to weaker adjustment among more exposed firms; it does not show that their investment fell in absolute terms. The negative imported-input response was concentrated among financially constrained firms. Taken together, the results suggest that firms adjusted more readily through export reallocation than through irreversible upgrading, as proxied by green-input sourcing, while financial constraints particularly weakened the investment response. This strengthens the case for predictable implementation, project preparation, and targeted investment support. These short-run announcement estimates use input sourcing as an investment proxy; long-run emissions and welfare effects remain open.[19]

Mutual interests therefore lie in viable low-emission supply and affordable industrial inputs. The Customs Union and the separate 1996 coal and steel agreement provide institutional channels, while CBAM obligations continue to apply. Ankara can use these channels to pursue cooperation with European importers and downstream users on emissions data, verification capacity, and bankable upgrades. Both sides benefit from keeping low-carbon trade viable. Redirecting the same carbon-intensive production to another market, however, does little for the climate.[20]

IV What Brazil, India, and South Africa Reveal

Each comparison highlights a different issue: the emissions boundary in Brazil as a potential source of excess, negotiated implementation in India as a potential remedy, and recognition of an existing tax in South Africa. The trade figures are kept in their original years and product categories. The cases are assessed on their own terms rather than forced into a common ranking.

Brazil and the Competitive Effects of Emissions Coverage

Brazil's aluminum case illustrates how the emissions boundary affects competitive rewards. ABAL reports $250 million of CBAM-covered aluminum exports to the EU in 2025, or 14.3 percent of Brazil's exports in that basket. The association argues that excluding electricity emissions diminishes the advantage of renewable-powered production and seeks locally accessible CBAM-authorized verification. Under current rules, lower electricity emissions alone leave the aluminum certificate calculation unchanged.[21] Brazil couples its opposition to unilateral border measures in the 2025 BRICS declaration with EU cooperation on carbon pricing. Its regulated-market law establishes a framework; deductible amounts depend on eligible payments attributed to the relevant goods. The cooperation cited here concerns carbon-pricing capacity, with exporter-level transition finance remaining a separate question.[22] In Brazil's case, the key question is whether the current emissions boundary gives EU producers a meaningful cost advantage that cannot be justified by leakage concerns or measurement constraints. Brazil's objection identifies a trade-off whose competitive consequences depend on those comparisons. Brazil qualifies Türkiye's argument: recognition of verified production differences matters, but a cleaner electricity mix alone provides insufficient grounds for a finding of protectionist excess. The implications for Türkiye are not necessarily aligned with Brazil's. A broader extension of indirect-emissions accounting to metals, including steel, would reward renewable-powered production but could also alter the relative CBAM position of Turkish electric-furnace steel.

India and the Scope for Negotiated Cooperation

NITI Aayog reports 2025 EU purchases of $3.9 billion in Indian iron and steel and $1.06 billion in aluminum. These category aggregates describe commercial exposure. Coal-based blast-furnace and direct-reduced-iron routes make cleaner ironmaking central to adjustment, while emissions assessments must remain specific to the supplying installation.[23] India's distinctive contribution is the scope for negotiation. Its government's January 2026 account of the concluded EU trade talks records commitments on carbon-price recognition, verifiers, and targeted assistance. The Commission also envisaged €500 million over two years for industrial transition, subject to budgetary procedures. These announcements establish an agenda for cooperation, with delivery and firm-level access still to be assessed. India's Carbon Credit Trading Scheme sets intensity targets and compliance purchases; a deduction requires an eligible net payment. Domestic verifier credentials similarly require the relevant EU accreditation.[24]

India joined BRICS objections to unilateral measures while pursuing these arrangements.[25] India suggests that verification and compliance costs may be reduced through negotiation: locally accessible verification could protect the integrity of CBAM without unnecessarily raising compliance costs for exporters.

The assessment remains conditional on implementation. India supports Türkiye's case for negotiating practical verification and financing arrangements, while qualifying the claim that CBAM necessarily precludes mutually beneficial cooperation.

South Africa and Recognition of an Existing Carbon Tax

Wesgro identifies R30.79 billion of CBAM-covered iron and steel exports and R12.58 billion of covered aluminum exports from South Africa to the EU in 2023. These figures provide a useful indication of South Africa's exposure to CBAM-covered trade. Coal-dependent electricity complicates transition, although its emissions fall outside the current charge on these goods. The relevant emissions comparison concerns the supplying installations.[26] South Africa has administered and collected a carbon tax

since 2019. Allowances and relief make the eligible net payment, rather than the headline rate, the relevant starting point for a deduction. Tax returns and payment records can support a traceable claim for the emissions embodied in exported goods. Actual-emissions reporting additionally requires CBAM-accredited verification.[27]

The government's 2025 cabinet statement called for coordinated opposition to CBAM on development and competitiveness grounds. Cooperation nevertheless continued. At the March 2025 summit, the EU announced a €4.7 billion Global Gateway package spanning energy transition and other sectors. Its relevance to exposed plants depends on project allocation and disbursement; the headline envelope extends well beyond CBAM adjustment.[28]

For South Africa, the issue is more straightforward: if a carbon tax has genuinely been paid and can be traced to the exported product, refusing to recognize it would risk imposing a second carbon cost without a clear environmental justification. Country-level information leaves actual rejection rates unresolved. South Africa qualifies Türkiye's argument by locating the issue in recognition of taxes effectively paid: an operational payment trail offers a stronger basis for deduction than Türkiye's reporting-only 2026 pilot.

The three cases point to different problems. Brazil raises the question of what emissions CBAM rewards; India shows the value of negotiated verification and finance; South Africa tests whether carbon costs already paid abroad are recognized in practice. CBAM can advance climate goals when these arrangements reward verified abatement. Where an avoidable accounting or administrative barrier materially favors EU production and a proportionate alternative is available, that feature constitutes protectionist excess under the test used in this paper.

V Policy Options for Türkiye and the European Union

Make Verification and Carbon-Price Recognition Work First

Before the September 2027 deadline, Türkiye's Climate Change Presidency, trade authorities, TÜRKAK, and sector associations should organize product-specific readiness programs.

Priorities include installation and precursor records, independent verification, confidentiality, and error correction. Shared training and data tools can reduce smaller firms' costs. Progress should be measured in practical terms: whether firms can find verifiers, how long verification takes, how often reports are rejected, and how much of Türkiye's covered trade is ultimately backed by verified emissions data.

The EU should publish practical examples of carbon-price deductions and the free-allocation adjustment, with reasons for rejection and accessible correction procedures. A joint technical mechanism could work through real cases in steel, cement, aluminum, and fertilizers before firms lock themselves into contracts. Consistency across national authorities matters as much as nominal recognition. These steps are feasible within implementation cooperation and address the clearest mechanism of avoidable competitive disadvantage.

Sequence Carbon Pricing with Industrial Investment

Türkiye should use the 2027 pilot price mechanism to establish credible monitoring, payment records, and transparent free allocation. Because extensive free allocation limits the carbon price effectively paid—and therefore the potential CBAM deduction—the pilot should also establish a credible trajectory beyond the initial allocation regime. A published trajectory, combined with project preparation and targeted financing, can reduce uncertainty around irreversible investments. Support should focus on the specific obstacles that prevent firms from adjusting. Compensation that cancels the effective carbon price would undermine both abatement incentives and

eligibility for deductions. Full linkage with the EU ETS is a longer-term possibility, but it would require closer regulatory alignment and credible enforcement on the Turkish side.

The Ministry of Industry and Technology and its development-finance partners should publish a clear pipeline of projects under the investment platform. Scrap-based steel needs improvements in scrap quality, material efficiency, and production processes. Integrated steel requires a separate assessment of ironmaking technologies, feedstock, infrastructure, and energy supply. Renewable electricity supports the wider transition even where CBAM excludes indirect emissions. Cement and fertilizers require process-specific projects. Financing should go to projects that can demonstrate credible emissions reductions and would not proceed without additional support. Grants, guarantees, and loans should be reported separately.

Concessional support should overcome financing constraints without preserving high-emission capacity indefinitely.

Reporting should show where each project stands, from proposal and approval through disbursement, commissioning, and verified emissions reductions. Selection should consider workers and smaller suppliers. Authorities should assess support against the relevant competition rules, including the coal and steel framework, while recognizing that Turkish firms do not have the same access to European aid instruments.

Build Reciprocity into Implementation

The Commission and Turkish ministries should establish a standing implementation group connected to existing trade and climate dialogues, with participation from producers, EU importers, and downstream users. Most disputes are likely to arise first around verification and default values. As payments begin, recognition of Turkish carbon costs and access to transition finance will become the next test. A confidential channel for firms to report documented problems would also help separate administrative failures from genuine differences in emissions performance.

The EU should assess CBAM alongside remaining free allocation and industrial support. Any assistance should come with clear decarbonization conditions and safeguards against overcompensation. Default values should be reviewed regularly, and firms should have a workable way to replace them with reliable evidence. Blanket country exemptions would weaken incentives and invite circumvention. A better approach would be targeted administrative support and transition finance awarded through open competition, both of which can ease unnecessary costs without weakening the climate objective.

By the end of 2027, after the first annual declaration cycle, the two sides should have enough evidence to assess verification costs and the use of defaults. A fuller review after the September 2028 declaration cycle, once 2027 Turkish carbon payments can be observed in CBAM declarations, should examine whether carbon-price deductions are being accepted and whether transition projects are delivering measurable results. Product-level trade data should be matched with EU consumption figures to show where dependence is concentrated. The review should also examine how much alternative supply exists and how quickly buyers can qualify new suppliers. It should control for changes in European demand, energy prices, exchange rates, and other trade restrictions. It should also track whether emissions are simply shifted to other markets and who ultimately bears CBAM-related costs under commercial contracts.

VI Conclusion

Türkiye has grounds to challenge avoidable CBAM barriers that materially favor EU production without environmental necessity. Where such barriers arise, the charge of green protectionism becomes stronger. A genuine carbon-cost difference, by contrast, remains consistent with the purpose of climate policy. Several implementation risks can already be identified, and many can be addressed through implementation. The broader effects on competition and emissions will only become clear as the definitive regime develops. Cooperation will depend on whether verified emissions and carbon payments are recognized in practice, and whether firms on both sides can invest in

cleaner production. On these terms, CBAM can support decarbonization and cooperation. Otherwise, it can burden Turkish suppliers and European users while rewarding administrative advantage over climate performance.

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