



To: National Energy Technology Lab, U.S. Department of Energy, Morgantown Campus, 3610 Collins Ferry Road, P.O. Box 880, Morgantown, WV 26505-2353

From: Carbon Capture Coalition

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Re: Carbon Border Adjustment Mechanism Study Request for Information, Ref. No. 89243326NFE000233

About the Carbon Capture Coalition

The Carbon Capture Coalition is a nonpartisan collaboration of companies, unions, conservation and environmental policy organizations, building federal policy support to enable economywide, commercial-scale deployment of carbon management technologies. Carbon capture, removal, transport, reuse, and storage technologies—commonly referred to as carbon management—are a portfolio of safe, available, and increasingly cost-effective emissions reduction technologies used to manage, abate, and remove carbon emissions from industrial facilities, power plants, and directly from the air. Carbon management technologies are necessary tools to cut emissions across sectors, strengthen the nation's energy and industrial leadership position in the world, and create family-sustaining jobs for workers.

Response:

Transparent, reliable, and publicly available US emissions data to support credible carbon accounting and accurately reflect the emissions of goods and products manufactured within the US is central to the success of the American carbon management industry. The United States produces some of the cleanest energy and materials on the market today, when compared to global emissions intensity averages. To maintain the US carbon advantage, transparent and comparable emissions data across sectors will ensure that American energy and industrial sectors can continue to compete in global markets that are increasingly prioritizing cleaner production.

The US Environmental Protection Agency (EPA)'s Greenhouse Gas Reporting Program (GHGRP) has historically provided an important source of standardized, facility-level

emissions data, including information relevant to carbon capture and geologic storage. As federal emissions reporting programs evolve, the Coalition encourages maintaining the core functions necessary to ensure the continued availability of consistent and reliable emissions data for policymakers, industry, and other stakeholders.

4. Methodological Expertise and Recommendations:

a. Provide comments on the most robust, defensible methodology for calculating a national average product emissions intensity per a U.S. Schedule B code and/or TARIC code for the sectors listed in 2a.

NETL should use a transparent, production-weighted methodology based on facility- and process-level US data wherever available, with consistent system boundaries across production pathways. Existing federal datasets, models, and repositories, including but not limited to EPA's Greenhouse Gas Reporting Program (GHGRP) and Greenhouse Gases, Regulated Emissions, and Energy use in Technologies (GREET), should be used where appropriate to provide reliable facility-level emissions data and account for emissions reductions from carbon capture and storage (CCS) projects for calculating the emissions intensity of a product. National averages should retain sufficient geographic disaggregation to reflect material differences among production technologies, the carbon intensity of energy sources, and facilities deploying CCS. In areas where actual data are unavailable, modeled or default values should be clearly identified along with their assumptions and uncertainties.

b. Provide comments on weaknesses, gaps, or biases in the EU's CBAM calculation methodology.

The EU CBAM methodology's use of default values where actual emissions data are not used may not fully reflect the performance of US facilities deploying lower-carbon production technologies, including carbon capture and storage. Default values are based on EU-established methodologies and benchmarks rather than the actual emissions performance of the specific facility or production process that produced the imported good. As a result, US producers with emissions performance below the applicable default value may not receive recognition for that performance when default values are used. Access to reliable, verified US emissions data is therefore important for reducing reliance on default values and enabling American producers to demonstrate their actual emissions performance. Maintaining robust and transparent US facility-level emissions data, including the core reporting functions currently provided through

EPA's Greenhouse Gas Reporting Program (GHGRP), is likewise essential for supporting credible product-level emissions calculations and enabling US producers to demonstrate their actual emissions performance. As federal emissions reporting requirements evolve, NETL should consider how potential gaps in publicly available, transparent US emissions data could affect its ability to accurately characterize US products under CBAM.

c. Provide comments on technically sound alternatives or adjustments to EU's CBAM calculation methodology.

Carbon capture and permanent geologic storage can materially reduce the direct emissions associated with the production of CBAM-covered goods. The Coalition is encouraged to see the EU's CBAM methodology recognize these emissions reductions by allowing qualifying CO₂ transferred to permanent geologic storage to be accounted for as not emitted.

The Coalition recommends that NETL establish a clear pathway for recognizing US regulatory, reporting, and monitoring frameworks that provide comparable assurance of permanent geologic CO₂ storage. NETL should evaluate how existing domestic regulatory and reporting frameworks for geologic sequestration of CO₂, including EPA's Class VI program and the GHGRP, align with CBAM requirements for demonstrating capture and permanent storage. Where US requirements provide comparable assurance, recognition of those systems could reduce duplicative monitoring, reporting, and verification while maintaining the environmental integrity of CBAM.