



CREATING GOOD JOBS, A CLEAN ENVIRONMENT, AND A FAIR AND THRIVING ECONOMY

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Introduction

The BlueGreen Alliance (BGA) is a unique and enduring coalition that leverages the collective strength of its partners and their members to build consensus and advocate for shared solutions that fight the climate crisis, create good-paying, union jobs, advance racial and economic justice, and protect the health and fundamental rights of working people. BGA unifies its members into a powerful voice for a clean, thriving, and equitable economy. To that end, we appreciate the opportunity to respond to the National Energy Technology Laboratory's (NETL) Request for Information (RFI) on the study of a Carbon Border Adjustment Mechanism (CBAM).

The European Union's (EU) CBAM is an important indicator signaling the direction global markets are headed—low carbon products will have a growing advantage—and NETL's study will help keep U.S. producers competitive as the EU implements this new program. Measuring our industrial emissions helps certify that U.S. heavy industry has relatively low emissions compared to global averages while highlighting investment opportunities for further emissions reductions. Without this data, domestic producers stand to lose or jeopardize additional economic value in global markets that increasingly privilege cleaner products.

Tracking emissions allows governments to craft well-tailored, data-backed policies that seek to mitigate pollution and address climate change; and it allows U.S. industry to maintain its global competitiveness as a leading producer of low-emissions goods.

U.S. Advantage

The United States has a varied emissions advantage on the global stage with each sector mentioned in the RFI, with a clear lead in certain sectors and near equal emissions intensity in others. In general, U.S. industry is cleaner and more responsible than the producers holding the majority of the global market share, and most U.S. industry operates with a carbon advantage, emitting less than the global average.

For cement, the EU CBAM will have minimal practical impact on the domestic industry, as the United States exports virtually no cement to Europe.ⁱ Though cement exports to the EU are negligible, the measurement practices spurred by CBAM can strengthen the industry's social license to operate and position facilities more competitively in a carbon-constrained global economy. In addition, imports from China, Vietnam, Turkey, and Indonesia threaten domestic industry, and having verifiable data on our carbon advantage would help fight those import pressures.

U.S. primary steel is cleaner than the global average. It is roughly on par with the EU and significantly cleaner than China, India, and Russia.ⁱⁱ For workers in these facilities, the NETL data would provide verified emissions figures that avoid the punitive default values the EU's CBAM imposes when such data is unavailable.

The U.S. primary aluminum industry sits in the middle of the global pack, with small trade volumes to the EU but significant room for improvement reducing emissions.ⁱⁱⁱ That said, China and India represent the significant majority of global aluminum production, and the U.S. industry holds a significant emissions advantage over both nations.^{iv} The domestic chemicals industry is notably cleaner than its foreign counterparts, but there is likely to be very little trans-Atlantic hydrogen trade from the U.S. to the EU, and the U.S. is struggling to scale production of green hydrogen in part due to the shortening of tax incentives in the One Big Beautiful Bill Act (OBBBA).^{v,vi}

The U.S. International Trade Commission recently conducted a landmark investigation into the greenhouse gas emissions intensity of U.S. steel and aluminum products, quantifying the carbon advantage many U.S. products maintain.^{vii} The Climate Leadership Council similarly quantified the carbon advantage of U.S. manufactured goods, finding that, on average, they are more than twice as carbon-efficient as the world average.^{viii} The results and methodologies of these studies will be informative to NETL's upcoming study.

Community Health

Monitoring greenhouse gas emissions gives communities a clearer picture of which pollutants are being released into their environment, while also providing governments with the evidence needed to design smart, targeted policies that reduce pollution and confront climate change.

Robust policy—guided by data—can protect public health and help communities overcome intensifying threats posed by extreme weather fueled by our warming planet. Ignoring this responsibility leaves vulnerable populations at even greater risk, particularly low-income neighborhoods and communities of color, which already suffer disproportionately from industrial pollution and risk of extreme weather.^{ix}

A 2023 [report](#) by Synapse compiled a database of every domestic facility in four heavy industries: steel, cement, aluminum, and metallurgical coke, and quantified the community impacts. They include employment figures at each facility to show its current economic impact on the local community, while detailing the facility's greenhouse gas emissions and the local communities' exposure to pollution.^x NETL can use a similar methodology to include community-level impacts into any study of industrial impacts they conduct.

Necessity of the Greenhouse Gas Reporting Program

The Greenhouse Gas Reporting Program (GHGRP) is an example of a successful government program that effectively tracked emissions and transparently shared information with community and industry stakeholders. Unfortunately, the U.S. Environmental Protection Agency is threatening to dismantle it.

Repealing the GHGRP would be short-sighted, a lose-lose decision that benefits no one and harms U.S. industry, workers, and communities. Domestic industries desire and actively rely on this program to provide transparency to markets and customers who are increasingly seeking out low-embodied-carbon products.^{xi} Industry also relies on the GHGRP to capitalize on tax credits like 45Q that help support technology development that will ultimately make the industries called out in this RFI cleaner and more competitive.

Companies increasingly use the GHGRP to quantify emissions abated, demonstrating that their products are often cleaner and less emissions-intensive than similar products

from other countries. Analysis finds that as many large economies look to carbon conscious trade measures, repealing the GHGRP could jeopardize \$1.6 to 9.3 billion in U.S. export revenue annually.^{xii} The GHGRP helps position U.S. companies to lead in a global economy in which market demand is shifting to favor low-carbon products and enables them to create and retain good jobs over the long term. It is a well-trusted government program that industry relies on to collect data that global customers are seeking. It positions the United States as a global leader in the production of technologies that will enable a low-carbon future. It provides needed transparency, information, and data, and repealing it would be a grave mistake.

Conclusion

Regardless of U.S. policy on emissions, the global market for low-carbon manufactured goods is real and growing. Such markets for low-carbon construction materials are projected to grow 3% annually from 2025 to 2030.^{xiii} Private companies continue to move towards decarbonized supply chains, and organizations such as the First Movers Coalition have emerged as first-of-its-kind efforts to leverage collective purchasing power and accelerate decarbonization in heavy-emitting sectors.^{xiv}

As other countries with high ambitions for emissions reductions are increasingly adopting measures to level the playing field for their own manufacturers, the U.S. must maintain its industrial edge by transparently monitoring and quantifying where our industry holds a climate advantage and working diligently to maintain that advantage by reducing emissions across the board as global markets shift toward demand for low-carbon materials.

ⁱ Cement Europe, EU Cement Industry Trade Statistics, April 2026.

<https://www.cementeuropa.eu/media/bw4j1sxx/cement-europe-trade-report-full-year-2025-april-2026.pdf>

ⁱⁱ BlueGreen Alliance, How Clean is the U.S. Steel Industry?, November 2019.

<https://www.bluegreenalliance.org/wp-content/uploads/2021/04/HowCleanistheU.S.SteelIndustry.pdf>

ⁱⁱⁱ Global Efficiency Intelligence, Aluminum Climate Impact 2025 – An International Benchmarking of Energy and CO2 Intensities, 2025.

<https://static1.squarespace.com/static/5877e86f9de4bb8bce72105c/t/68a936a9ba97f66dc95acb59/1755920041864/Aluminum+benchmarking+-+8.22.2025.pdf>

^{iv} Global Efficiency Intelligence, Aluminum Climate Impact, February 2022.

<https://www.bluegreenalliance.org/wp-content/uploads/2021/04/Aluminumreportdesign-FinalFeb2022.pdf>

^v Atlantic Council, Transporting hydrogen; A global outlook on cross-border trade, July 2025.

<https://www.atlanticcouncil.org/wp-content/uploads/2025/07/Webster-How-the-US-can-thrive-in-the-global-hydrogen-economy.pdf>

^{vi} Fuel Cell Works, China to Dominate Green Hydrogen Market as US Withdraws Subsidies: Report.

September 2025. <https://fuelcellworks.com/2025/09/04/electrolyzer/china-to-dominate-green-hydrogen-market-as-us-withdraws-subsidies-report>

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- viii Climate Leadership Council, America's Carbon Advantage, March 2025. <https://clcouncil.org/report/americas-carbon-advantage-2025/>
- ix Science Advances, PM2. 5 polluters disproportionately and systemically affect people of color in the United States, 2021. https://cfpub.epa.gov/ncer_abstracts/index.cfm/fuseaction/display.abstractDetail/abstract_id/10614
- x Sierra Club, Industrial Decarbonization: Climate, Jobs, Justice, and American Industries, September 2023. <https://www.sierraclub.org/industrial-transformation/industrial-decarbonization-climate-jobs-justice>
- xi Carbon Capture Coalition, EPA Proposes Damaging Repeal of the Greenhouse Gas Reporting Program, which Underpins Public Confidence in the 45Q Tax Credit, 2025. <https://carboncapturecoalition.org/epaproposes-damaging-repeal-of-the-greenhouse-gas-reporting-program-which-underpins-publicconfidence-in-the-45q-tax-credit/>
- xii NRDC, Proposed GHGRP Repeal Analysis, 2025. <https://www.nrdc.org/sites/default/files/2025-10/ghgrp-repeal-export-analysis-methodology.pdf>
- xiii Global Industry Analysts, Low-Carbon Construction Materials Market, November 2025. <https://www.researchandmarkets.com/reports/6106752/low-carbon-construction-materials-market>
- xiv First Movers Coalition, First Movers Coalition Impact Brief, January 2024. https://www3.weforum.org/docs/WEF_First_Movers_Coalition_Impact_Brief_2024.pdf