



UKRMETALURGPROM

31.03.2020 AK-399

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**COMMENTS**  
**of the Association UKRMETALURGPROM (Ukraine)**  
**concerning the Carbon Border Adjustment Mechanism**

Association UKRMETALURGPROM represents the whole Ukrainian steel industry and herewith would like to share its view as regards inception impact assessment on carbon border adjustment mechanism.

Ukraine fully shares ambitious climate change agenda of the European Union and is an active participant of the UN Framework Convention on Climate Change. Current Nationally Determined Contribution of Ukraine foresees 40% reduction of GHG emissions vs 1990, which is pretty significant on a global scale.

Association Agreement between Ukraine and the European Union provides for complete implementation of European regulations re environment and climate change in Ukraine. These include GHG emissions monitoring, reporting and verification, introduction of EU like Emissions Trading Scheme etc.

Alongside these commitments, recently the Government of Ukraine publicly declared its intention to get fully involved and integrated into the EU Green Deal initiatives put forward by the European Commission.

Moreover, Ukraine is one of few countries globally which has in place a fully-fledged carbon tax covering all installations emitting over 500 kg of CO<sub>2</sub> per annum.

All the above clearly illustrates that Ukraine is at the forefront of global climate change effort and is a reliable partner of the European Union in this area.

Therefore, UKRMETALURGPROM would like to point out that mutual trade in steel goods between Ukraine and the European Union should not be subject to any carbon border adjustment mechanism.

Regards,

President

Oleksandr Kalenkov