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Carbon, Borders, and Meaning: How the EU's CBAM Is Framed and Contested in Türkiye and South Africa

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**Universiteit
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MASTER'S THESIS

Carbon, Borders, and Meaning: How the EU's CBAM Is Framed and Contested in Türkiye and South Africa

Master's in International Relations – European Union Studies

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Chapter 1 : Introduction

Why CBAM matters for climate and trade

The main motivation of this thesis is to clarify an uncertainty. While the EU defines CBAM as a measure that boosts justice and reduces carbon leakage, other countries may find this unfair in many respects. This thesis compares these narratives and analyzes how they shape perceptions of legitimacy.

It focuses on the gap between the presentation of CBAM by the EU as a fair climate measure and interpreted in external countries as an unfair burden (Otto 2025, p. 177), and examines how this gap affects legitimacy and countries' reactions.

The main question of the research is as follows: "How is the EU's CBAM policy framed in Türkiye and South Africa and what economic, political, and social meanings does it gain?"

The same policy tool can be framed with different words by different actors. While in EU texts and media CBAM is mentioned with concepts such as climate leadership, fair competition and preventing carbon leakage (European Commission 2024 , pp. 8–11), in South Africa it is mentioned as an additional burden, green protectionism, violation of sovereignty, or unfair burden sharing (DTIC 2025, p. 45; Sambhav 2024, pp. 5–6, 15–16; Rumble & Gilder 2023; van Diemen 2025).

These discursive differences are not only about communication; they also shape actors' political reactions, diplomatic positions, and how far the regulation is accepted globally (Sambhav 2024, pp. 15–16). For this reason, this study considers CBAM not only in terms of what it is, but also in terms of how it is made meaningful across countries, and how these meanings shape legitimacy perceptions. In doing so, it addresses an important gap in the literature.

Climate policies have become highly debated in public and policy agendas in recent years. A climate policy decision taken in a country affects not only that country's emissions, but also trade, investment decisions, the cost structure of industry, and relations with other countries (IPCC 2022, p. 18). For this reason, climate regulations are no longer only an area related to the environment. They have become related to governance, and they are directly linked to the economy and politics.

According to these, CBAM is a subject of governance directly linked to the economy and politics (European Union 2023, Recital 29). This thesis aims to examine comparatively the discourses on the European Union's Carbon Border Adjustment Mechanism (CBAM), which is one of the most

controversial instruments where this transformation has become more concrete. The main reason why CBAM is a topic that is researched so much is that it claims to be not only focused on trade but also climate-focused. Therefore, in this way, it gains a two-sided position (European Union 2023, Recital 15). The selected sectors are also those with the highest risk of carbon leakage. Carbon leakage means production shifting to countries with looser climate rules, which can undermine climate targets (European Union 2023, Recital 29). On this basis, stronger results may appear when sectors with high emission intensity are prioritised (European Commission 2024, p. 10).

Because carbon costs differ from country to country, CBAM has a goal of reducing carbon leakage and encouraging the transition to mechanisms that will protect the climate also in countries outside the EU (European Commission 2024, p. 9; European Union 2023, Recital 10). These dynamics can make a country's capacity and willingness to implement climate targets weaker, and they can direct companies to countries with looser climate rules (European Commission 2024, p. 8; European Union 2023, Recitals 9–10).

Therefore, CBAM is at the center of this tension: It has both a goal to make the climate goals stronger, and it makes trade competition and cost debates more visible (European Commission 2024, p. 8; European Union 2023, Recitals 9–12).

For this reason, the mechanism has been designed gradually to make the compliance process easier as well. Between October 2023 and December 2025, countries will only be required to report, and financial obligations will begin in 2026 (European Union 2023, Art. 32; European Union 2023, Recital 12).

Theoretical preview (framing/discourse)

The thesis makes use of the discourse and framing approach to understand CBAM debates. Simply put, actors, while narrating a policy, emphasize some elements and push others into the background.

Thus, the policy gains meanings such as “logical”, “fair”, “necessary”, or “dangerous”. This study also examines which perspectives and approaches stand out the most during the analysis of CBAM. The headings are: justice and burden sharing; competition and cost; sovereignty and legitimacy; and leadership and cooperation. These headings show how actors frame CBAM and within which frames they perceive it. This study examines comparatively how these narratives are established and how the EU's “climate leadership” claim is met in different contexts. This

study uses frames to make certain perspectives in the text more visible. Through this approach, it is clear how CBAM is made meaningful in different ways by different actors and how this is reflected in differences in perception and implementation (Entman 1993, p. 52).

Why Türkiye and South Africa are good cases

This study uses these two countries as case studies to compare how CBAM is framed in Türkiye and South Africa. One of its goals is to understand what meanings this mechanism gains in national debates. In this way, the differences that appear between the EU's CBAM narrative and the narratives of external actors are analyzed through content analysis across two different national contexts.

There are two main reasons for selecting Türkiye and South Africa. First, both countries have important trade relations with the EU, and the sectors within the scope of CBAM are also in a sensitive position for these countries and for the EU (T.C. Ticaret Bakanlığı [Republic of Türkiye, Ministry of Trade], n.d., p. 12; Department of Trade, Industry and Competition [DTIC], 2025, p. 57; Long et al., 2023, p. 7). South Africa and the EU establish a common framework to make trade and investment “greener”. At the same time, it aims to increase competitiveness and sell some green products to the EU (DTIC 2025, p. 57). This situation causes CBAM to become a concrete economic problem for these countries rather than an abstract debate. Second, the economic structures, energy profiles, and political priorities of the two countries are not the same. For this reason, how CBAM is reflected in their media, the reactions given by country politicians, and the narratives they establish can differ (Long et al. 2023, p. 7).

In Türkiye, CBAM is sometimes seen in the framework of compliance necessities and protection of competitiveness. While in South Africa, the situation is clearer. Discussions are mostly focused on justice, sovereignty, and inequality in the global (Long et al. 2023, p. 7; Government of South Africa 2025, p. 45). These differences help explain why CBAM's international legitimacy is controversial.

Chapter 2 : Literature Review

CBAM Literature's General Framework

This section aims to present the main academic and institutional studies on the European Union's Carbon Border Adjustment Mechanism (CBAM). The literature is evaluated to show the main

frameworks used to analyse CBAM, the key dimensions that come to the fore, and the overall tendency of current debates.

Accordingly, the section outlines the main focus of these debates and highlights the research gap that has not yet been studied. An important part of the studies regarding CBAM focuses on reducing carbon leakage and protecting competition in the EU internal market. Carbon leakage refers to the shifting of production, and thus emissions, to third countries for various reasons due to higher carbon costs. In this context, production can shift to countries with weaker climate rules (European Commission 2024 , pp. 8–9). This shift may weaken climate targets and distort competition. Accordingly, CBAM is discussed in the literature as an economic regulation and raises questions about its compatibility with trade rules.

Although CBAM, in practice, offers a response to carbon leakage, there are concerns about international trade law and its harmonisation (Mehling et al., 2019, p. 433). According to recent studies, the scope of CBAM relative to global trade volume remains quite limited. In Europe, the share of the products within the scope of CBAM is also low compared to others. According to the OECD as well, CBAM for now covers a limited area in terms of both trade and job opportunities (Dechezleprêtre et al. 2025, p. 11).

Despite this, the EU aims to create a similar carbon cost between products produced within itself and imported products. In doing so, it aims to prevent companies from shifting their production to countries with looser climate rules. As stated in CBAM official documents, both the EU's climate targets are protected, and decarbonization in third countries is encouraged (European Union 2023, Recital 10; Recital 15).

In contrast, how the carbon price will be reflected in imported products and to what extent this can raise the issue of discrimination under World Trade Organisation (WTO) rules are among the issues of debate (Mehling et al., 2019, p. 433). In the literature, it is stated that the debates regarding CBAM generally gather around three main targets. These are the protection of competitiveness, the reduction of carbon leakage, and the limitation of global welfare losses (Zhong & Pei 2023, p. 228).

Framing, Context, and Different Meanings

The European Union explains what kind of climate targets CBAM has (European Commission 2024 , pp. 8–10). In the literature, it is shown that countries reframe CBAM according to their

own economic and political contexts and, through these framings, attach different meanings to the mechanism. At the same time, the compatibility of CBAM with international climate policy is also discussed (Zhong & Pei 2023, p. 240; European Union 2023, Recital 12). Some sources mention that CBAM cannot be applied in the same way in all countries and that it should vary across contexts.

According to Zhong and Pei (2023), CBAM is envisaged to be implemented by developed countries as a tool to protect fair competition. However, it is stated that it may not be very possible to ensure equality for developing countries in this way. It is also stated that defining justice through equal emission costs is, by its nature, not suitable for developing countries (Zhong & Pei 2023, p. 24). Therefore, this may create a risk of shifting of production to countries with lower environmental standards (European Union 2023, Recital 12; IPCC 2022, FAQ 8.2, p. 185).

The basis of the mechanism is the EU Emissions Trading System (ETS). At the same time, CBAM is applied to goods imported into the EU, and it has been formed in a way aligned with how emission reporting would be made within the EU ETS in case the same goods are produced in the EU (European Commission 2024, pp. 9–10; European Union 2023, Recital 15). Products produced in the EU have to make certain payments due to the emissions arising in the production process. Products coming from outside the EU do not face a certain carbon cost. This can cause the investments to be made not in the EU but in countries with looser rules, with fewer restrictions, or with no restrictions (European Union 2023, Recital 10; Pander Maat 2022, pp. 66–67; European Commission 2024, pp. 9–10). In this situation, countries with high carbon intensity are especially affected (Branger & Quirion, 2014, p. 29).

The EU argues that CBAM aims to protect competition and environmental aims. Accordingly, CBAM is showing itself as a mechanism that highlights environmental goals while also having an economic justification (Pander Maat 2022, pp. 66–67).

CBAM was initially limited to high-emission sectors such as iron and steel, fertilisers, and electricity. These sectors have a tendency to be in a competitive environment. The reason for this form of implementation is to start the application from the areas where the risk of carbon leakage is the highest (European Union 2023, Recitals 30–32; Annexe I). In these sectors, producers, when carbon costs increase, are more prone to shift production to countries with looser climate rules. This both weakens the EU's climate targets and disrupts the competition balance.

Accordingly, CBAM aims to apply here the approach of equalising the carbon cost by first focusing on the sectors where leakage is the most likely (European Union 2023, Recitals 30–32).

CBAM's Design and Supply Chains

CBAM certificates are defined as carbon units that importers have to take. This requirement aims to cover the embedded emissions of imported goods (European Union 2023, Art. 32; European Commission 2024, pp. 9–10). In the transition period, enterprises only report their embedded emissions, while after 2026 the carbon price will become a cost that must be paid directly (European Union 2023, Art. 32; European Commission 2024, pp. 9–10). CBAM, because it redefines production costs in carbon-intensive sectors, also directly affects global supply chains (Dechezleprêtre et al. 2025, p. 11–13).

CBAM is affected to a large extent by the carbon price of the country where production is carried out, by the energy profile, and by the competitive conditions of firms that trade with the EU, especially in sectors such as iron and steel, fertilizers, and aluminium (Dechezleprêtre et al. 2025, pp. 11–13; European Union 2023, Recitals 31–32). Firms turn to countries and regions with lower carbon costs, and supply chains are also rearranged accordingly (Dechezleprêtre et al. 2025, pp. 11–13). In addition, CBAM also affects how production is geographically located and causes changes. Countries that want to access the EU market shift their supply chains to lower-carbon options. Also, to be less affected by CBAM, they put on their agenda adopting national carbon-pricing mechanisms or cleaner energy sources (OECD 2024, pp. 11–13; Maimele 2024, pp. 16–17).

MRV, Institutional Capacity and Compliance Costs

For the implementation of CBAM, the monitoring, reporting, and verification (MRV) processes for the emissions of products included in cross-border trade must be compatible with one another. However, countries differ significantly in their technical and institutional capacity to carry out these processes (Maimele 2024, pp. 22–23). In some studies, it is shown that countries' approaches to the CBAM system are not only from cost concerns but largely from their levels of technical preparation and institutional capacity (Maimele 2024, p. 14, 22–23; IPCC 2022, p. 185).

The IPCC states that, especially in regions such as East, Central, and West Africa and South Asia, poverty, inequality, infrastructure deficiencies, and weak institutional structuring make

adaptation to climate risks difficult. In this framework, adapting to new climate regimes becomes much more difficult and costly in these regions (Maimele 2024 , p. 14, 22–23; IPCC 2022, p. 185). These differences reflect broader patterns of vulnerability and adaptive capacity highlighted in the IPCC (2022, p. 185). Therefore, CBAM is not only an environmental regulation. It also reflects how prepared countries public administrations and institutions are. Moreover, it is a mechanism that also requires data in supply chains to be open and traceable (Maimele 2024 , p. 22–23).

Legal Debates and WTO Compatibility

From a legal perspective, the EU argues that CBAM is compatible with WTO rules. In official statements, it is especially highlighted that the EU and other countries are not subject to a treatment that would put them at a disadvantage, that the implementation is transparent, and that there is no discrimination. It is further stated that CBAM is an instrument that aims mainly to protect the climate beyond protecting trade (European Commission 2024 , pp. 9–10; European Union 2023, Recital 72). However, even if the prohibition of discrimination is theoretically complied with, there is a risk that transition and certification costs will be faced, especially by exporting countries whose MRV capacity is relatively weak (Maimele 2024 , pp. 22–23).

Article III of GATT 1994 sets out that internal taxes and similar regulations cannot be designed in a way that would place imported goods at a disadvantage compared to domestic products. The basic purpose is to prevent protectionism through internal regulations and to ensure that imported products can compete with domestic products under similar conditions (World Trade Organisation [WTO], 1994, GATT 1994, Art. III).

Recital 15 of the CBAM Regulation also emphasises that the carbon cost foreseen for imported products will be aligned with the cost that the domestic producer is obliged to pay under the EU ETS. It is also emphasised that the mechanism is a climate instrument and is designed to be compatible with WTO rules (European Union 2023, Recital 15).

For this reason, the mechanism has been formed in a gradual way. Thus, countries are both given time for adaptation, and it is aimed that they develop gradually their MRV systems and institutional capacities that will comply with CBAM requirements (European Union 2023, Art. 32; European Commission 2024 , pp. 9–10; Maimele 2024 , p. 1).

Even though fair burden sharing and climate responsibility are emphasised in the EU's official frame, this frame does not find the same response in every country. For some countries, CBAM means additional obligations such as transforming production and collecting data.(European Union 2023, Rec. 12, 15; Burger, 2023; Alexander, 2024)

Therefore, CBAM is not only a regulation that creates additional costs, but it is also defined as a tool that motivates countries to adopt climate policies and shift to low-carbon production technologies (World Bank 2024 ; Türkiye Exporters Assembly [TİM] 2025). Especially in countries where the reporting and verification infrastructure is weak, administrative costs are at a higher level. Countries that are already poor and have limited institutional capacity may be affected disproportionately by climate-related additional obligations (IPCC 2022, p. 171; Maimele 2024 , p. 22–23).

These countries question who should face the transition costs. As a result, CBAM is defined differently across countries. For this reason, CBAM is seen not only as a carbon pricing mechanism but also as a political tool that makes visible countries' positions and claims in climate policy. From this perspective, this issue became more comprehensive. It went far beyond environmental targets and became related to economic capacity, access to resources, and power relations over who will undertake the costs.

Country-Specific Contexts in the Literature

In the literature, how CBAM is interpreted differently among exporting countries is addressed as well. In this section, in order to show how CBAM gains meaning in different national contexts, the discussions specific to Türkiye and South Africa are presented, respectively.

Türkiye Context

This context shows how CBAM can be reframed through country-specific economic and political priorities and how it may gain different meanings as a mechanism. In Türkiye, CBAM debates are not explained only through cost and compliance obligations. Beyond this, they are examined by taking into account the restructuring of industrial policy and the protection of competitiveness (World Bank 2024).

Because of the EU Green Deal and CBAM-like regulations, Turkish producers need to invest in green solutions to maintain competitiveness. Therefore, for Turkish firms, it is interpreted as

making energy more efficient, making low-carbon production, accessing finance, and providing policy support (World Bank 2024). Especially in the iron-steel and cement sectors, because Türkiye trades intensively with the EU, CBAM in some sources comes to the fore from Türkiye's perspective as a transformation instrument that aims to reduce the carbon intensity of production processes (World Bank 2024).

In policy texts, CBAM is defined as a mechanism that forces exporting firms to shift to low-carbon production technologies. From this perspective, it offers a modernisation opportunity (TİM 2025; World Bank 2024). For this reason, the framing in Türkiye positions CBAM on the one hand as a mechanism that must be complied with as an obligation and on the other hand as a strategic transformation opportunity (World Bank 2024 ; TİM, 2025). That the EU, in its official documents, aims for the decarbonisation of third countries also confirms this (European Union 2023, Recital 10).

South Africa Context

This context reflects how CBAM can be reframed through country-specific economic and institutional conditions and how different meanings can also be attributed to the mechanism. Some studies on South Africa mention that there is not enough information on CBAM, and the preparation part doesn't function properly. It is stated that the language is legally complex and that reporting is also unclear (Maimele 2024 , pp. 13–14). Moreover, especially in South Africa, sources also debate that CBAM is imposed unilaterally and can create confusion instead of supporting processes. The existing uncertainties are generally related to how emissions will be reported. In addition, it is mentioned that there is a lack of awareness (Maimele 2024 , p. 14). Past analyses show that exporting countries, if they apply their own carbon pricing systems, will be affected less by CBAM (European Commission 2024 , p. 9; Maimele 2024 , p. 22). For some countries, CBAM means additional obligations such as changing production processes and collecting data (Rumble & Gilder 2023; van Diemen 2025). For this reason, CBAM is framed by countries with different meanings (Maimele 2024 , p. 22–23; Rumble & Gilder 2023).

The Gap in the Literature

In the literature, CBAM is mostly discussed in terms of its compatibility with World Trade Organisation (WTO) rules (Branger & Quirion, 2014; Mehling & van Asselt, 2019; Sambhav 2024 ; Durel 2024). According to the EU, the basic idea of the mechanism is the following: the

carbon cost paid for imported products should be at a similar level to the cost that would be paid within the scope of the EU Emissions Trading System (ETS) if the same product were produced within the EU (European Union 2023, Recital 12; European Commission 2024 , pp. 9–11).

In this way, it is argued that CBAM is compatible with the principle regulated in GATT Article III and foreseeing that imported products compete with domestic products under equal conditions (World Trade Organisation [WTO], 1994, GATT 1994, Art. III). However, some studies also mention that in practice, CBAM is able to create additional reporting systems for producers outside the EU. Also, because of the certification, reporting and compliance burdens, themes of discrimination and protectionism may become effective for producers outside the EU (Maimele 2024 , pp. 16–17, 22). These debates largely concentrate on the legal compatibility of CBAM and whether it is discriminatory. On the other hand, how the mechanism is made notable in different countries and how it is framed are very limited in the literature (Mehling & van Asselt, 2019; Sambhav 2024 ; Durel 2024 ; Zhong & Pei 2023).

By contrast, CBAM has also been evaluated as a mechanism that imposes different levels of responsibility on countries regarding climate (Maimele 2024 , pp. 14, 22–23; IPCC 2022, p. 185). In the EU's official framing, CBAM is framed as a necessary tool for the fair sharing of global climate responsibility and is presented as a mechanism contributing to global emission reduction. At the legal level, it is argued that it is compatible with the prohibition of discrimination by equalising as much as possible the carbon cost between imported products and products produced in the EU (European Union 2023, Recital 12; European Commission 2024 , pp. 9–10).

A large part of the studies in the CBAM literature addresses the mechanism from two different perspectives. The first of these is the economic dimension, namely competition, trade effects, and costs. In particular, analyses have been made on international trade law and WTO compatibility (Branger & Quirion, 2014; OECD 2022; Zhong & Pei 2023; Sambhav 2024 ; Durel 2024). For example, the WTO compatibility debate is at the centre of academic and institutional debates about CBAM and broader carbon regulations. Studies in this area examine how legal arguments are constructed and how, over time, an understanding that is compatible with the WTO has become stronger (Durel 2024). Similarly, a large part of the current debates on CBAM is more related to legal compatibility and the economic impacts of the implementation (Sambhav 2024).

Conversely, how the same policy gains meaning in different country contexts, with which frames actors define CBAM, and the divergences between the framings of different actors have been addressed in a limited way in the literature (Branger & Quirion, 2014; OECD 2022; Zhong & Pei 2023).

This study makes a comparative qualitative content analysis of the CBAM frames of the EU, Türkiye and South Africa. Therefore, it addresses this gap. While doing this, it aims to show how justice, responsibility, and burden sharing are handled in different contexts. It also aims to establish a link between research on climate justice, framing and CBAM.

However, existing studies discuss CBAM mainly through economic, legal, and administrative results. The content frameworks with which actors make this mechanism meaningful have been a subject of research in a more limited way. This study also sees CBAM debates as a content area. Besides, it aims to examine with which frameworks the EU, Türkiye, and South Africa use the concepts of justice, responsibility, and burden sharing. In this respect, the study aims to build a bridge between the climate justice and framing literature and the CBAM literature.

Chapter 3: Methodology

Case Justification

The case selection is justified as follows. Türkiye and South Africa have a high trade volume with the EU in carbon-intensive sectors such as steel, cement, and aluminium within the scope of CBAM (T.C. Ticaret Bakanlığı, 2024 , p.12; DTIC 2024 , p. 28). However, the initial conditions differ in terms of institutional readiness, MRV infrastructure, and policy capacity (Maimele 2024, p. 1; T.C. Ticaret Bakanlığı, 2024, p. 12). For this reason, it was decided that they are suitable for comparison (T.C. Ticaret Bakanlığı 2024, p. 12; DTIC 2024, pp. 29–30).

Türkiye's effort to progress close to EU values and export dependence explains the effort to adapt to CBAM and, at the same time, its competitiveness (T.C. Ticaret Bakanlığı, 2024 , p. 12). For this reason, the framing in Türkiye positions CBAM on the one hand as a mechanism that must be complied with as an obligation and on the other hand as a strategic transformation opportunity (World Bank 2024 ; EY Türkiye 2023; Dinçel 2025).

South Africa's electricity generation is largely based on coal (Maimele 2024, p. 5). It is mentioned in sources that the reporting system and the determination of emissions are a weak area for South Africa (BUSA/Nedlac 2024 , p. 14; Maimele 2024 , p. 1). This situation is also

associated with the insufficiency of financial and administrative readiness in the CBAM transition period and problems in the emissions accounting/reporting infrastructure (Maimele 2024 , p. 1).

For this reason, an additional burden arises for countries (Maimele 2024, p. 1; DTIC 2024, p. 30). When all these factors combine, problems arise both about how and by whom the costs will be shared and whether the transition process is fair (BUSA/Nedlac 2024 , p. 6). Therefore, CBAM's legitimacy, justice, and competition discourses are established differently by these countries. By selecting these two countries, it becomes clear that the same EU policy, although it has made similar trade relations, can be perceived differently and cause different results.

Methodological Approach

This study focuses on publicly available texts that emerged during the CBAM transition period. The period examined is between October 2023 and December 2025. The transition period refers to 2023–2025, when importers only report emissions but do not yet pay for them. This period covers a timeframe in which CBAM reporting obligations are in force but financial obligations have not yet begun (European Commission 2024 , p. 13). Within this transition period, in addition to the founding CBAM text, the CBAM Regulation (European Union 2023) and the Commission's proposal text dated 17 December 2025 (COM(2025) 989) are included among the sources to explain the EU narrative and implementation.

Keywords were selected to capture the main themes in the research question. For this reason, the search terms were divided into two groups. First, words that directly express CBAM (e.g., "CBAM", "Carbon Border Adjustment Mechanism") were selected. Afterwards, thematic words showing the discussions around CBAM were selected. The main themes are fairness, competitiveness, cost, sovereignty, compliance, reporting, MRV, and embedded emissions. Turkish and English keywords were used together because the texts in the corpus are published in two languages.

This study codes recurring frames and themes in CBAM-related texts in a systematic way through a qualitative content analysis approach (Entman 1993, pp. 51–52). In this way, how CBAM is defined and how it is justified in the EU, Türkiye, and South Africa contexts is presented through comparisons (Entman 1993, pp. 51–52; van Leeuwen 2007, pp. 91–93).

In this thesis, legitimation is analysed on the basis of van Leeuwen's classification. In practice, van Leeuwen's categories are used as a coding scheme to classify justification patterns in each

text and to compare how these patterns appear in EU, Türkiye, and South Africa sources (van Leeuwen 2007, pp. 91–93). This approach makes it possible to comparatively trace in EU, Türkiye, and South Africa texts on which grounds CBAM is defended or criticized (van Leeuwen 2007, p. 92).

This analysis is based on text-based sources such as government statements, reports of ministries of trade, media discussions, and evaluations of international institutions. This study does not conduct an economic impact analysis or a detailed legal compliance test (Sambhav 2023; Durel 2024).

Data Collection

The dataset of this research consists of three main source types.

The first group is official EU texts that define CBAM and explain the implementation framework in the transition period. The CBAM Regulation (European Union 2023), the Commission proposal dated 17 December 2025 (COM(2025) 989), and the European Commission's informational texts are examined (European Parliament and Council of the European Union 2023; European Commission 2024)

The second group consists of institutional / policy documents in Türkiye and South Africa: documents published by the Republic of Türkiye Ministry of Trade and the South African Department of Trade, Industry and Competition (DTIC), as well as reports by think-tanks such as TIPS and BUSA/Nedlac, are evaluated (T.C. Ticaret Bakanlığı 2024 ; DTIC 2024 ; TIPS 2024 ; BUSA/Nedlac 2024).

The third group is reliable media analyses and news that make it possible to follow and contextualize CBAM-related debates in the public sphere. In this scope, reliable news sources such as Reuters and S&P Global are used (Reuters 2025; S&P Global 2025).

The aim is to show comparatively how the official definition of CBAM in the EU and the public/policy framings in Türkiye and South Africa were constructed within the same period. For this reason, the corpus is divided into three source types: (i) the EU's official legal and informative texts, (ii) policy reports and institutional documents in Türkiye and South Africa, (iii) reliable media analyses that bring discussions on CBAM to the public.

Content Analysis

In this study, qualitative content analysis was used. The analysis identifies recurring frames in the texts and compares which elements these frames bring to the fore in the EU, Türkiye, and

South Africa contexts (Entman 1993, p. 52). The forms of legitimation are coded by dividing the texts into units of meaning and are interpreted by also taking van Leeuwen's legitimation categories into account (van Leeuwen 2007, p. 93). At the same time, the analysis does not aim to do a linguistic discourse analysis (van Leeuwen 2007, p. 92)

Chapter 4: EU Framing

Purpose and Framework

Specifically, in EU texts, it is examined which problem CBAM is presented as a solution to, which concerns are expressed, and which role the EU positions itself in (European Union 2023: Art. 1; Rec. 1, 10, 12, 14). Accordingly, EU official documents position CBAM not only as a trade instrument but also as a regulatory instrument linked to climate targets (European Union 2023: Rec. 15).

Corpus and Reference Logic

The dataset (corpus) for this section consists of publicly available texts published during the period October 2023–December 2025, which is the transition period for CBAM. The corpus has the EU's official and legal texts (especially the CBAM regulation and related articles/recitals), the European Commission's informational communication materials (statements, guides, factsheets), and selected media analyses that bring the debate to the public.

Climate tool, prevent carbon leakage

In the EU narrative, CBAM is framed as a solution to the risk of carbon leakage that may arise from shifting production to third countries because of the costs of climate policies. In CBAM texts, the risks of countries rerouting their imports to other countries in order not to be responsible for existing payments are underlined (European Commission 2024, p. 8; European Union 2023 Rec. 10). This risk is evaluated as a problem due to both the weakening of climate targets and the ineffectiveness of the regulation; therefore, CBAM is considered one of the policy instruments used to protect the climate and achieve the decarbonization target (European Union 2023 Rec. 9–10).

The Commission (3 July 2025) also states that the carbon leakage risk is considered not only on the import side, but also in terms of EU goods exported to third countries, and that a new measure is planned first (European Commission 2025b, July 3). It is also stated that CBAM is

not an instrument that works alone, but is used together with other policy instruments, and that it is one of them; in Rec. 10, CBAM is counted as an element of the “toolbox” of policy instruments acting in line with the neutrality target by 2050 (European Union 2023 Rec. 10).

Fair competition, equal treatment

The other problem stated in EU texts is that products produced with weaker climate rules create an unfair advantage in the EU market (European Union 2023 Rec. 9–10). It is stated that supporting producers at risk and protecting the principle of equal treatment between goods produced in the EU, imported in the EU, or exported from the EU is the purpose of this mechanism (European Commission 2025b, July 3).

In this framework, causality is constructed as follows: Carbon costs within the EU increase gradually. If products coming from outside do not carry the same costs, fair competition and equal treatment are not ensured, and this may increase carbon leakage (European Union 2023 Rec. 9, Rec. 12). Therefore, the solution is to take the embedded emissions approach as the basis for certain carbon-intensive products imported into the EU and to ensure that all countries trade in a fair environment (European Union 2023 Rec. 10, Rec. 12, Rec. 15).

At the center of these approaches are “fair competition” and “equal treatment”. The EU states that while designing CBAM, EU products should not be in a more advantageous position and that the regulation is positioned as a climate measure (European Union 2023 Rec. 10, Rec. 12, Rec. 15). Equal treatment is applied not only to EU goods but also to the idea that imported products should not be under more unfavorable conditions than similar products that are already produced in the EU (European Union 2023 Rec. 29). Also, the EU reflects to the public that products compete under equal conditions and are not discriminated against, both while presenting this as a climate measure and also as a goal of compatibility with international trade rules (European Union 2023 Rec. 15).

In think-tank policy briefs and policy reports, it is also emphasized that CBAM is established by the EU with the justification of “fair competition” and that the EU aims to create an equal level playing field by applying carbon pricing both to production within the EU and to foreign producers that sell to the EU (Cornago & Berg 2024 , pp. 1–3). Therefore, an image described as discriminatory has also formed in some trade partners, especially for countries using different decarbonization policies instead of carbon pricing; when countries such as China and India

threatened to bring CBAM to the WTO, the EU argues that the mechanism is compatible with the WTO (Cornago & Berg 2024 , p. 1).

In the EU narrative, the legitimacy of CBAM is based on the idea that production within the EU and foreign producers selling to the EU carry a similar carbon cost. In this way, through the level playing field discourse, the aim of making competition fairer is brought to the fore, and CBAM is reflected as an application at the border established in parallel with internal carbon pricing (Cornago & Berg 2024 , pp. 1–3). The EU legitimizes CBAM not only as an environmental instrument, but also through equal treatment and fair competition, and it aims to guarantee that the joint application of free allocation under the EU ETS and CBAM in the transition period does not create a privilege in favor of EU goods. Free allocation means that, to prevent competitiveness loss, some industries receive emission allowances without charge.

This legitimization is reinforced by the claim that CBAM supports global emission reduction and remains compatible with WTO rules as a climate measure (European Union 2023 Rec. 12, Rec. 15, Rec. 29), and by the point that a third party verifies the emissions figures that importers report (European Union 2023 Rec. 47). In another media source, CBAM is described as a mechanism that protects producers in the EU who already pay a carbon cost, and it is emphasized that imported products should also face a similar cost (Tamma & Bounds 2025, February 6).

The aim is to create a mechanism that reduces the risk of carbon leakage, is compatible with climate targets, and makes competition conditions within the EU fairer. In EU discourse, responsibility is given to EU institutions for design and implementation; importers are responsible for reporting and compliance, and verification systems are given the task of making the data reliable (European Union 2023 Article 8(1)). As a result, what remains in the background is mostly discussed at the implementation level, including capacity differences between countries, MRV difficulties, and how the financial burden is distributed (European Union 2023 Rec. 15; Cornago & Berg 2024 , pp. 3–4).

In the CBAM implementation, the reporting obligation belongs to the importer, and even if a direct customs representative or external service provider is used, responsibility remains with the importer (European Commission 2024 , pp. 46–47). In the transition period, the Commission manages the registry and monitors compliance, while Member States apply sanctions and penalties (European Commission 2024 , p. 21; European Union 2023 Rec. 26).

EU climate leadership, partnerships, finance, Global Gateway, Team Europe

This framework shows that the EU positions itself in a broader international language of climate governance. Getting technical and financial support to developing countries is evaluated as related to the discourse of cooperation and leadership (European Union 2023 Rec. 8, Rec. 71, Rec. 73). Institutional texts such as Global Gateway/Team Europe focus on the EU's climate partnerships with other countries and investment approach rather than on the legal design of CBAM (European Commission, Directorate-General for International Partnerships, n.d.).

The EU establishes a context that completes its climate agenda, which also covers CBAM, with the language of leadership, partnership, financing, and technical support (European Commission 2024 , pp. 8–9, p. 14). The message that CBAM should not be perceived only as a border measure and should be seen as part of a broader transformation package is also becoming stronger (European Union 2023 Rec. 10; Pander Maat 2022, p. 61). Commission texts in the Gateway/Team Europe line make visible the background of leadership and cooperation in which the EU finances the climate transition together with external partners (European Commission 2025, Press release, 9 October 2025; European Union 2023 Art. 30(8)).

For example, the Commission announced the “Team Europe” package, which is evaluated as an investment in renewable energy in Africa under Global Gateway and revealed this through the language of partnership and energy transition (European Commission 2025, Press release, 9 October 2025). Therefore, the purpose of these texts is to explain how the EU provides cooperation and financing in external climate policy rather than to create a legal justification (European Commission, JOIN(2021) 30 final, 1.12.2021, Introduction). The EU establishes its role in a normative framework by placing CBAM into a narrative of leadership responsibility and solidarity in global climate action (European Union 2023 Rec. 8, Rec. 71, Rec. 73; Pander Maat 2022, p. 61).

Gradual transition, reporting first, costs later

While establishing the gradual design of CBAM, the EU structured it so that importers' obligations in the transition period are limited to reporting. This approach establishes the logic of “reporting first, then financial obligations” between 1 October 2023 and 31 December 2025 (European Union 2023 Art. 32).

In the CER policy brief, it is stated that CBAM is designed with a gradual transition logic and that reporting and declaring obligations apply since October 2023, while payment starts from January 2026 through CBAM certificates aligned with the EU ETS price (Cornago & Berg 2024 , pp. 1–3). A national customs information text also describes the transition period as a gradual process in which reporting comes first and payments start in 2026 (Revenue 2025, July 15).

Easier compliance, smaller importers, SMEs

In the EU narrative, the reporting and payment requirements of CBAM may be unnecessarily heavy for those who import small amounts; therefore, privileges and simplification discussions are introduced for small importers, while emphasizing that CBAM must protect its environmental objective (Cornago & Berg 2024 , pp. 1–3; European Commission 2025a, February 26). Under Regulation (EU) 2025/2083, official texts highlight that actions that aim to make the processes easier should be limited. While almost all emissions remain within the scope, practices such as intentionally splitting shipments are also targeted. (Regulation (EU) 2025/2083 2025, Rec. 2–5).

In this scope, it is envisaged to introduce a mass threshold and to set a starting level as 50 tons (Regulation (EU) 2025/2083 2025, Rec. 3). A customs press release notes that flexibilities in reporting could apply, but that their scope is limited and should give similar results to CBAM methods (Finnish Customs 2024 , Press release, 18 July). In another information note, it is stated that small importers below the threshold value may be exempted from certain obligations as of 1 January 2026. It also explained that firms can use the transition period to learn and apply reporting. In addition to these, it is stated that no penalty will be applied for incomplete or unfinished quarterly reports below the threshold value in the years 2024-2025.(Danish Energy Agency, n.d.).

In the Financial Times news, it is stated that it is planned to narrow CBAM so that it will focus on the largest importers to reduce bureaucratic burdens, while keeping monitoring, reporting, verification, and transparency as fundamental requirements (Tamma & Bounds 2025, February 6).

In the EU's narrative, responsibility has been formed mostly through importers and reporters providing correct information and also fulfilling their obligations. The Commission has been positioned as an actor that monitors the implementation and, when necessary, makes the rules

simpler and strengthens them by using transition period data(European Commission 2024 , pp. 9, 19, 25, 35). Reporting, verification, and transparency are also seen as basic requirements for CBAM to be transparent (European Union 2023: Art. 8(1); European Commission 2024, p. 53).

Stricter rules, wider scope, more products

In EU texts, the aim to strengthen rules over time and develop scope is presented together, including monitoring and preventing circumvention (European Union 2023 Rec. 66–67). The mechanism is designed not only as a reporting regime but also as a regulation that aims to avoid gaps in practice and limit misuse (European Union 2023 Rec. 66). In CBAM, circumvention includes practices such as artificial modification of trade, changing classification with small changes, or artificially splitting shipments (European Union 2023, Art. 27).

The Commission (2 July 2025) emphasised that CBAM may transition to products further down the value chain. It also mentioned measures to prevent smuggling and that the rules of the electricity sector were also discussed. It also aimed to collect stakeholders' views about the possible effects of scope expansion and measures (European Commission 2025c, July 2). CER also states that CBAM has not reached its final form, and together with revision, scope expansion into other ETS sectors with carbon leakage risk is suggested (Cornago & Berg 2024 , p. 16). Cornago & Berg also suggest support for developing trade partners through technology transfer and financial assistance, possibly financed with CBAM revenues, and note that countries consider establishing carbon pricing mechanisms to be less affected and keep revenues domestically (Cornago & Berg 2024 , p. 4).

Narrative Tensions

The first tension is the views that CBAM is legitimised through fair competition and equal treatment, and in contrast that it is discriminatory (European Union 2023 Rec. 10, Rec. 12, Rec. 15, Rec. 29; Cornago & Berg 2024 , p. 4). While the EU narrative states that the rules are equalised and that there is no unfair advantage, from the outside, this equality can also be seen as a new burden and barrier (Tamma & Bounds 2025, February 6).

The second tension is between the defence of the climate goal and the complexity of implementation and the administrative burden. For this reason, alongside mandatory reporting and compliance, simplification and facilitation are also on the agenda (European Commission 2025a, February 26; Revenue 2025, July 15).

The third tension is related to the aim of the scope expanding and strengthening over time, and the capacity differences between countries. As the scope expands, MRV and compliance requirements become more visible and the discussion that the conditions CBAM is in and the capacity differences of countries are not equal becomes stronger (European Union 2023 Rec. 67; Cornago & Berg 2024). These tensions show that CBAM's legitimacy discourse is strongest at the level of principles, while objections become more pronounced at the level of implementation capacity and administrative burden.

Summary of findings

This section shows how the EU defines CBAM as a problem and how it legitimizes it using that logic. In the EU narrative, CBAM is framed as a regulation that protects the climate objective against the risk of carbon leakage. It is also made legitimate in commercial terms with the language of “fair competition” and “equal treatment”. This legitimacy is defined as a mechanism that operates in a more measurable and impartial way, with frequent mention of reporting and verification. These frames form a basis to compare how Türkiye and South Africa frame CBAM in the following sections.

Chapter 5 : South Africa Framing

Purpose and Framework

In this section, it is explained how South African sources define CBAM and how this narrative is structured through dominant frames.

Corpus and Reference Logic

Throughout the analysis, it was examined how CBAM is defined as a problem, how responsibility is assigned, and which solution paths come to the fore in these sources. The corpus consists of South Africa-focused texts published during the CBAM transition period (October 2023–December 2025). The narratives mostly cover legitimacy and justice debates, while the implementation covers reporting, calculations, and capacity.

Export and Competitiveness Risk

Within this frame, CBAM is evaluated as a threat to export competitiveness and is problematized accordingly. Responsibility is indirectly linked to the EU's cost-creating policy design and South

Africa's carbon-intensive production. The proposed solutions also focus on decarbonisation and compliance (van Diemen 2025; Bloomberg News 2024; National Business Initiative 2024).

The first text emphasizes that in sectors such as aluminium, CBAM-related costs can be at very high levels and that this can make the sector unable to compete in the EU (van Diemen 2025). Coal-based electricity and high embedded emissions are identified as the main factors of this risk; as a solution, steps such as increasing the recycling rate, expanding renewable energy, and strengthening the local carbon tax are brought to the fore (van Diemen 2025). In this framework, the text emphasizes the possibility that by 2034, the CBAM cost can rise to more than half of the value of South Africa's aluminium export value. This magnitude is presented as the main justification supporting the risk that competitiveness in the EU market can be seriously affected (van Diemen 2025). Accordingly, coal-fired electricity dependence is seen as a fundamental contextual part of the cost exposure.

In another source that supports this point, CBAM is framed in terms of competitiveness and macroeconomic cost for South Africa. The text states that CBAM and similar border carbon costs can negatively affect the country's exports and GDP; therefore, it presents the issue as a risk for South Africa (Bloomberg News 2024). It further notes that if such practices spread more widely, the effects can become more evident on exports and GDP. However, the source also includes an assessment that, with the current scope of the mechanism, the effects can remain more limited (Bloomberg News 2024).

In the NBI report, CBAM is addressed in terms of the risk of cost increases and loss of competitiveness for South Africa in the EU market. By also recalling the EU's share in South Africa's exports, the text states that once CBAM enters into force, the cost of sales to the EU will rise, which may weaken competitiveness (National Business Initiative 2024). It is emphasized that this effect will be more evident in sectors that cannot reduce carbon intensity quickly and effectively. The proposed response is generally shaped around compliance and the acceleration of transition investments. In this framework, it is stated that rising costs for South African products entering the EU market may weaken competitiveness and reduce future export value to the EU (National Business Initiative 2024).

Climate Justice and Unfair Burden

In this frame, CBAM is explained more as a transfer of burden rather than as a climate policy. Responsibility is generally linked to the EU's creation of unilateral policies, the limited nature of consultation processes, and the different capacities of developing countries.

The solution, however, covers justice, equality, the CBDR-RC principle, and redistributive expectations (UNFCCC, 1992, Art. 3(1); Paris Agreement, 2015, Preamble; Rumble & Gilder 2023; Creamer 2024).

According to the news of African Climate Wire, CBAM is evaluated as a controversial and conflictual topic in global climate governance. The text states that in the COP28 process, it is also not clear whether climate-linked trade measures such as CBAM will be officially negotiated (Rumble & Gilder 2023). In this narrative, the basic distinction is this: While developed countries want to discuss such unilateral measures within the WTO framework, African countries argue that the impacts, especially the outcomes for developing countries, should be evaluated within the UNFCCC and Paris regime (Rumble & Gilder 2023). The text evaluates this dispute as linked to equity and CBDR-RC principles and highlights how CBAM affects developing countries, which should be taken into account (Rumble & Gilder 2023). CBDR-RC refers to countries' responsibilities that appear common but are fundamentally different. Even if responsibility is shared, it means that the burden will not be distributed equally because of historical capacity differences (UNFCCC, 1992, Art. 3(1); Paris Agreement, 2015, Preamble; Art. 2(2)).

In the news in Daily Maverick, CBAM is described as a mechanism that operates like a one-way EU policy for African economies. It is stated that it creates a heavy burden without sufficient preparation and evaluation (Alexander 2024). The text argues that CBAM not only creates a carbon cost; it also creates new barriers in market access by bringing reporting and paperwork burdens into the export process (Alexander 2024). According to this source, the solution is to conduct communication more efficiently in the process and to reinvest CBAM revenues back into Africa (Alexander 2024). For this reason, it is noted that CBAM produces negative effects for developing economies and Africa; companies lose a less restrictive trade environment and have to operate in a more bureaucratic and more disadvantageous environment in terms of competition (Alexander 2024).

In another source, CBAM is evaluated as a unilateral regulation. Criticisms emerge that the burden is shifted to developing countries for the reduction of carbon emissions (Creamer 2024). The text does not address the debate only through technical compliance and reporting requirements. It is also addressed through justice and unequal capacity conditions (Creamer 2024). In this framework, in an environment where CBAM exists, developing countries carry out emission reductions at a slower pace. For this reason, CBAM is presented as a mechanism that

both causes costs and creates responsibilities (Creamer 2024). The fairness of the mechanism is also questioned. As a result, it is argued that CBAM's unilateral nature make the debate stronger on fair burden sharing (Creamer 2024).

Sovereignty, Policy Pressure, and WTO Contestation

In this frame, CBAM i not frame only as a climate instrument. It is also presented as an external pressure that is able to extend country's policy space (Abnett 2024 ; Rumble & Gilder 2023). For this reason, the search for solutions is shaped by negotiation with the EU and, if no outcome can be obtained, the possibilities of legal and political objections through the WTO (Roelf & Abnett 2024 ; Rumble & Gilder 2023).

According to the media source from Reuters, CBAM is presented as an external trade pressure rather than a climate instrument (Abnett 2024). In the news, it is explained that developing countries find CBAM punitive and unilateral, and that this narrows the investment space needed for the green transition (Abnett 2024). Accordingly, the discussion at COP29 grows not only through climate targets, but also through trade tensions and the negotiation area (Abnett 2024). It is argued that such costly climate-linked trade policies can weaken the capacity of developing countries to invest in the green transition and can slow the transition (Abnett 2024). While some countries want such measures removed, the EU defends CBAM, arguing that it ensures equal competition (Abnett 2024). In the news, it is also noted that Trump's tariff plans increase trade-based concerns (Abnett 2024).

In another source, CBAM is not a technical climate instrument; rather, South Africa positions it as an externally imposed policy instrument (Rumble & Gilder 2023). The text defines CBAM as a mechanism that makes it difficult for South Africa to determine its own climate and development preferences freely (Rumble & Gilder 2023). In the narrative, the effect of CBAM is described not only economically, but also as a coercive and guiding instrument; it is stated that this pressure can negatively affect its existing domestic policy agenda (Rumble & Gilder 2023).

In this framework, CBAM is also described as an element that weakens trust in the EU: while the EU supports South Africa with projects such as Just Transition, it is said that CBAM conflicts with this support and contradicts this logic (Rumble & Gilder 2023; International Labour Organization [ILO], 2015). Also, given the interpretation of CBAM as discriminatory, the WTO non-discrimination rule comes into play (Rumble & Gilder 2023; World Trade Organization [WTO], n.d.). According to WTO rules, countries cannot discriminate among trade partners; an advantage granted to one country must also be granted to other WTO members. This equal

treatment rule is called Most Favored Nation and is in the first article of GATT (World Trade Organization [WTO], 2011; World Trade Organization [WTO], 1994, art. I).

The text also brings to the fore the unilateral nature of CBAM, its changing competition conditions, and its limiting effects on development dynamics (Rumble & Gilder 2023). In the Reuters news, CBAM is presented as an instrument that developing countries see as “unilateral trade pressure,” and that can make it difficult to finance climate measures (Roelf & Abnett 2024). According to the news, climate-linked trade measures can also weaken countries’ climate efforts (Roelf & Abnett 2024). In Reuters, Patel’s approach is to first seek a solution by talking with the EU; if no result is obtained, the possibility of applying to the WTO comes to the agenda (Roelf & Abnett 2024). This shows that South Africa wants to proceed with negotiation at first, but if there is no agreement, it can turn to legal-political channels (Roelf & Abnett 2024). The EU, on the other hand, defends that CBAM is designed to be compatible with WTO rules and that, in order to prevent carbon leakage and achieve emission reduction, other countries should bear certain costs (Roelf & Abnett 2024). Therefore, the debate is not limited to the content of CBAM; it also becomes a question of authority and legitimacy regarding which forum should CBAM-related disputes be addressed (WTO trade law, or the justice/capacity principles of the UN climate regime) (Roelf & Abnett 2024).

Compliance Burden, MRV Capacity Gaps, and Coal-Based Electricity Disadvantage

In this frame, CBAM is addressed mainly as a technical and administrative compliance problem. Responsibility is linked to extensive MRV demands and South Africa’s limited data infrastructure and coal-based electricity production structure. The solution is defined as strengthening reporting capacity and increasing compliance preparations (Burger 2023; Wesgro 2024 ; KPMG 2025).

In this source, CBAM is explained for South Africa more thoroughly through the difficulties that the compliance process will create. Especially, the possibility that indirect emissions will enter the scope causes a new uncertainty for exporters and shows that more detailed emission data can be requested from firms (Burger 2023).

Indirect emissions, such as emissions related to electricity, are not directly emitted by the producer. They arise from the generation of the electricity used in production and from other processes that contribute to the production process.

Accordingly, the effect of CBAM is not only related to the question of “how much tax will be paid”. At the same time, companies are expected to calculate product emissions in detail, document this, present it, and prove the reliability of the data; therefore, the discussion is constructed through administrative burden and capacity (Burger 2023). The text states that South Africa's coal-heavy electricity generation and dependence on Eskom is a factor that increases embedded emissions. In addition, it is also implied that this may increase cost pressure and compliance obligations in exports to the EU (Burger 2023).

Wesgro’s information note similarly emphasizes that the high emission intensity of electricity generation in South Africa creates a cost difference within the scope of CBAM and that this creates a disadvantage for producers. It states that if the scope expands and indirect emissions also come into effect, this cost pressure can become more visible (Wesgro 2024 , p. 1).

According to another source, KPMG describes CBAM, rather than as a classical trade policy, as a compliance mechanism that forces companies to comply. It emphasizes that a new process focused on reporting, verification, and certificates is placed in front of companies (KPMG 2025). The text sets the background of CBAM with the European Green Deal and Fit for 55 and recalls that targets are set for emission reduction until 2030 (KPMG 2025). In addition, it notes that as the EU strengthens its carbon pricing and calculation system, carbon prices may rise even as decarbonization increases, and there is a risk of production shifting to countries with looser climate rules (KPMG 2025). Especially in the transition period, even if there are no payments in 2023–2025, it is stated that importers must collect emission data directly or indirectly, obtain data from the supply chain, and produce regular reports (KPMG 2025). It is noted that these can be constraining for many companies due to limited data infrastructure and IT capacity. According to this source, it is emphasized that after 2026, CBAM becomes more mandatory with steps such as authorizations, verified emission data, buying certificates, and submitting annual declarations, and that this creates a direct financial burden for companies (KPMG 2025).

Narrative Tensions

In the South African narrative, the main tension around CBAM is constructed around whether the mechanism is seen as a climate instrument or as an external cost and compliance pressure.

The first part of this tension is related to Export and competitiveness risk: it is noted that CBAM, especially in carbon-intensive sectors, can rapidly increase costs and weaken competitiveness in the EU market (van Diemen 2025; Bloomberg News 2024 ; National Business Initiative 2024).

The second tension is formed through climate justice and unfair burden. CBAM is defined as a mechanism that shifts Europe's transition cost to developing countries and that proceeds without sufficient negotiation and participation. In addition, it is stated that it unilaterally pressures African companies with both tax pressure and paperwork and reporting burden.

The third tension is constructed with Compliance burden, MRV capacity gaps, and coal-based electricity disadvantage. The discussions take place not only at the tax level but also through the calculation of emissions and reporting capacity. Coal-intensive electricity and dependence on Eskom come to the fore as a disadvantageous situation that causes embedded emissions to increase (Burger 2023; Wesgro 2024).

Another issue of tension is sovereignty and the policy area. CBAM is interpreted as an external pressure that may reduce options in domestic policy. In addition, negotiations and possible WTO objections are evaluated as a response (Rumble & Gilder 2023; Roelf & Abnett 2024)

Summary of findings

The overall situation that emerges in this section is as follows: in South African sources, CBAM is mostly framed not as a technical climate instrument but as an external general cost and compliance pressure. For this reason, CBAM is seen and discussed as a multidimensional risk area that simultaneously triggers the risk of loss of competitiveness, debates on fair burden sharing, pressure on the field of sovereignty and policy, and administrative compliance burden.

Chapter 6 :Türkiye

Purpose and Framework

Turkish sources present CBAM, on the one hand, as a mandatory cost and compliance pressure to protect competitiveness in the EU market. On the other hand, it is also interpreted as an opportunity that can accelerate the green transition. This dual reading leads to seeing compliance with CBAM in the texts as an economic necessity rather than an environmental aim. Therefore, CBAM is framed as an external trade pressure that reshapes Türkiye's export pattern to the EU and its mode of competition (Kılınç 2023; Schloemer & Lopez 2024 ; Usta 2024 , pp. 3, 10–11, 14; Dünya Gazetesi, 27 June 2024; Anadolu Ajansı [AA] 2023; Dinçel 2025, p. 2).

In this section, it is examined how CBAM is handled as a problem in Türkiye-focused sources, to whom responsibility is attributed, and which solution paths come to the fore.

Corpus and Reference Logic

The corpus of this section consists of the Türkiye-focused sources quoted below. These sources were read to determine the prominent, dominant frames and narrative tensions. Throughout the analysis, it is focused on how CBAM is defined as a problem, how responsibility is assigned, and which solution paths are brought to the fore in these sources.

Export and Competitiveness Risk

In this framework, CBAM is defined for Türkiye mainly as an external trade pressure that changes the competition conditions in the EU market. The sources state that Türkiye's export structure that is highly dependent on the EU is a guiding reason. For this reason, it is stated that non-compliance may lead to high costs and, in later stages, the risk of market loss. For this reason, in the texts, compliance is often not limited to an environmental objective. It is also presented as an obligation aimed at protecting Türkiye's position and competitiveness in the EU market (Kılınç 2023; Schloemer & Lopez 2024 ; Usta 2024 , pp. 3, 10–11, 14; Dünya Gazetesi, 27 June 2024; Anadolu Ajansı [AA] 2023).

CBAM, in the EY text, is constructed firstly for Türkiye as an export and competitiveness risk. The text emphasises that Türkiye continues to be an important part of EU-related foreign trade and argues that if Türkiye cannot comply with CBAM, Turkish companies may face cost disadvantages. This risk is explained through EU producers being exposed to carbon cost within the scope of the ETS, and these costs increasing with the reduction of free allocations. ETS functions as an internal carbon price, which shows a reference point for CBAM.

It is stated that CBAM applies a similar carbon cost to products imported to the EU and redefines the competition conditions. It states that unless Türkiye establishes its own carbon pricing, this difference can negatively affect exporters in Türkiye. Thus, CBAM is framed not as a climate policy but as an external trade pressure that changes the cost structure of Türkiye's EU exports and forces firms to make preparations (Kılınç 2023).

The World Bank opinion text also emphasises Türkiye's export-oriented trade structure and states that CBAM can change these dynamics. The text explains that firms must comply by decarbonising production in order to protect competitiveness (Schloemer & Lopez 2024). According to the text, if Türkiye does not comply and does not take steps for decarbonization, the entry into force of CBAM can negatively affect exports in the covered sectors (Schloemer & Lopez 2024).

In the IKV evaluation text, CBAM is defined as a risk for Türkiye that affects competition in the EU market and the existing trade order. It is stated that due to Türkiye's Customs Union relationship and the significant share of exports going to the EU, CBAM is one of the mechanisms expected to affect Türkiye strongly (Usta 2024 , p. 3, 10). In this framework, the most affected sectors are cement, aluminium, and iron and steel (Usta 2024, p. 11). The text emphasises the national ETS plan's integration with the EU ETS, its methodological equivalence, and recognition targets in the EU to manage this competitiveness risk (Usta 2024, p. 16). Finally, it is stated that if there is no carbon pricing in Türkiye, cost pressure will increase, and if a local carbon price is applied, the pressure can decrease (Usta 2024 , p. 14).

According to Dünya Gazetesi, CBAM is described as a risk that could leave Türkiye more disadvantaged in terms of costs and competition in the EU market. The text emphasises that if action is not taken, there can be cost increases, price disadvantages, and loss of market share (Dünya Gazetesi 2024, 27 June).

In TRT Haber, CBAM is constructed as a mechanism that affects Türkiye's sectors exporting to the EU and can create cost competition pressure (Anadolu Ajansı [AA] 2023). The text emphasises the obligation of the CBAM certificate to close the gap between the carbon price in the EU and that in the producing country and states that, as carbon emissions decrease, the cost burden will decrease (Anadolu Ajansı [AA] 2023).

Opportunity and Green Transformation

In this framing, CBAM is addressed for Türkiye not only as a cost pressure, but also as an opportunity that accelerates the transition to green production. It is stated that CBAM can be effective for the transformation of production processes. The sources also state that, especially in exporting sectors, some steps to reduce carbon intensity have become mandatory and that this process should be carried out together with elements such as energy transition, making development more sustainable, and facilitating access to finance. For this reason, the response given to CBAM in the texts is not only to fulfil compliance rules. It is defined as a determining mechanism for Türkiye to become more resilient in the long term, to protect its competitiveness, and to produce low carbon emissions (Dinçel 2025, p. 2; TİM, n.d.; Usta 2024 , pp. 15–16, 18; Dünya Gazetesi, 27 June 2024).

In the Shura text, CBAM is evaluated not only as a technical compliance work, but as a transformation need in exporting sectors. The text argues that the transformation should be

addressed within the framework of energy transition and sustainable development in a way that will also include intersectoral connections (Dinçel 2025, p. 2).

In the IKV text, it is emphasised that Türkiye's establishment of a national ETS can help the CBAM-related costs to be managed within Türkiye instead of being fully transferred to the EU and can produce resources for transformation (Usta 2024 , p. 18). The text also highlights the steps taken to follow the Green Deal process and avoid obstacles to access to the EU market, as well as the systems established to manage the process (Usta 2024, pp. 15–16).

In the news of Dünya Gazetesi, it is stated that CBAM is presented not only as a risk but also as an incentive that directs firms towards production with lower carbon intensity (Dünya Gazetesi 2024 , 27 June).

Compliance and MRV Capacity

In this framing, CBAM is explained for Türkiye mostly through compliance and MRV capacity. The sources emphasise that CBAM is not only a cost issue, but that the main critical point is that firms measure, report, and verify their carbon emissions accurately. For this reason, in the texts, institutional preparation and capacity for the administrative parts come to the fore. Especially, it is emphasised that the transition period is a period for firms to prepare for CBAM and learn the mechanism. Also, due to issues such as rule clarity and the administrative burden on smaller actors, the texts highlight that, in practice, MRV capacity and administrative readiness are decisive for managing both compliance and cost exposure.

Policy Alignment and Industrial Competitiveness

In this framing, CBAM is not only an environmental policy for Türkiye. It is also read as an issue of complying with rules in order to remain in the EU market and protecting competitiveness. The point basically emphasised in the texts is that due to Türkiye's trade ties with the EU, CBAM in practice operates as a market standard and therefore, policy compliance directly affects the competitive environment in industry. Based on this, CBAM is positioned as a mechanism that requires Türkiye both to align its legislation closer to the EU and to develop instruments that will reduce the carbon cost difference (Usta 2024 , pp. 10, 14; Dinçel 2025, p. 2).

Fairness and Burden-Sharing

In this framing, CBAM is read through who should bear the cost, how much it should be shared, and how much cost it will create. The texts state that CBAM can be perceived as a unilateral

burden for foreign trade partners; therefore, they state the importance of establishing inter-country cooperation, providing financing, and mechanisms that provide coordination. Therefore, according to these texts, cooperation and financing forms provide a fairer sharing of the costs brought by CBAM (Dinçel 2025, p. 2; Pacheco, 2026).

The Shura text focuses on the discussion of the fair sharing of the cost burden that CBAM will create. The text emphasises the importance of international cooperation and financing opportunities for the transformation of industry; it states that climate diplomacy and coordination with exporting countries affected by CBAM is critical in terms of justice in cost distribution (Dinçel 2025, p. 2).

According to the Euronews news, CBAM is also discussed on who the cost remains with and whether this is fair. In the news, it is conveyed that some countries evaluate the regulation as protectionist and that there are question marks about WTO compliance (Pacheco, 2026). Also, countries that have their own carbon market can take into account the carbon cost they pay through national systems; therefore, the cost burden can become more balanced (Pacheco, 2026).

Narrative tensions

The first main tension is that CBAM is simultaneously framed as a competitiveness threat and a transformation opportunity. Many texts bring to the fore the cost pressure and the risk of market loss, while others emphasize that compliance can accelerate decarbonisation and can increase long-term competitiveness.

The second main tension arises from carbon costs and the capacities that countries already have. In some texts, the CBAM discussion is evaluated directly depending on additional costs and the risk of market loss, while in others, it is emphasised that the main determining element is MRV (measurement–reporting–verification) capacity and administrative preparation. In this view, the transition period is seen as a process of technical learning and establishing institutional infrastructure before the payment stage. Based on this, if competitiveness pressure is to be reduced, the aim should be not only to reduce taxes but to produce data more systematically and to manage the rules in practice. In addition to this, the fairness and burden-sharing framework mentions that CBAM can be perceived by countries as a unilateral burden, and the need to cooperate between countries and to find financing is brought to the fore (TİM 2024 ; Usta 2024 , pp. 10, 16–17; AA 2025; Dünya Gazetesi, 22 May 2025; Dünya Gazetesi, 27 June 2025; Pacheco, 2026).

Summary of findings

In Turkish sources, the dominant reading of CBAM stems from its presentation as an external trade pressure that alters competition conditions in the EU market. Due to Türkiye's high export dependence on the EU, it is underlined that if Türkiye fails to align with the EU, there is a risk of cost increases and market loss. Compliance is mostly evaluated as an economic necessity rather than an environmental objective (Kılınç 2023; Usta 2024 , pp. 3, 10–11, 14; Dünya Gazetesi, 27 June 2024; Anadolu Ajansı [AA] 2023).

At the same time, some texts frame CBAM as an opportunity that can accelerate the green transition. These sources also argue that decarbonization should be carried out together with energy transition and access to finance (Dinçel 2025, p. 2; TİM, n.d.; Usta 2024 , pp. 15–16, 18). The narrative also refers to MRV capacity, namely measurement, reporting, and verification. In addition, institutional and administrative preparedness is highlighted as a determining element of compliance.

From the perspective of policy alignment, CBAM is explained as a mechanism that creates pressure toward alignment with EU standards and the development of carbon pricing instruments compatible with the ETS (TİM 2024 ; Anadolu Ajansı [AA] 2023; AA 2025; Dünya Gazetesi, 22 May 2025; Dünya Gazetesi, 27 June 2025; Usta 2024 , pp. 10, 14; Dinçel 2025, p. 2). Finally, debates on justice and burden sharing bring forward the need for cooperation and financing in order to distribute costs more evenly (Dinçel 2025, p. 2; Pacheco, 2026).

Chapter 7 : Comparative Analysis

Comparing problem definitions

Country-based analyses in the previous sections have shown that, although CBAM is the same policy instrument, it is interpreted through different core problem definitions in the European Union, Türkiye, and South Africa contexts.

In the analysis conducted in the EU context, CBAM is described as a climate policy instrument created to prevent the risk of carbon leakage (European Union 2023, Recital 29). According to official regulations and Commission texts, CBAM prevents the shifting of production to third countries and protects the EU's climate targets and the conditions of competition in the internal market (European Commission 2024 , p. 8; European Union 2023 Rec. 10) For this reason, CBAM is considered a necessary and legitimate step to protect the consistency of climate policies (European Commission 2024 ; European Union 2023).

In the Türkiye context, the analysis shows that CBAM has more meaning through foreign trade, competition conditions and climate targets. CBAM is a regulation that may affect access to the EU market and is framed as a mechanism that creates cost and compliance pressure for exporters. In this narrative, the core problem is whether Türkiye can protect its competitiveness and export capacity within its intensive trade relationship with the EU (Kılınç 2023; Schloemer & Lopez 2024 ; Usta 2024 , pp. 3, 10–11, 14; Dünya Gazetesi, 27 June 2024; AA 2023; Dinçel 2025, p. 2).

In the South African context, the analysis has shown that CBAM is mostly presented not as a technical climate instrument, but as a policy instrument imposed from outside that may produce unfair outcomes. Due to the coal-intensive energy structure and limited reporting and compliance capacity, the perception that CBAM will create a disproportionate burden comes to the fore. In this narrative, the main problem is not climate targets. It is justice, sovereignty, and unequal burden sharing (van Diemen 2025; Burger 2023; Rumble & Gilder 2023; Alexander 2024).

Frame hierarchies across cases

When the three cases in this thesis are evaluated together, although the frames related to CBAM are visible in each context, they are not prioritised in the same way. For this reason, the aim here is to clarify which frame is the main frame in each country and which remain supporting or secondary.

In the EU context, the overarching frame is the presentation of CBAM as an instrument that protects climate targets (European Union 2023 Rec. 9–10; European Commission 2024). This frame sets the direction of the debate, and other frames are mostly placed within it. For example, the emphasis on green competition or green conditions in the EU is often presented as complementary, rather than as a fully independent problem definition (European Union 2023 Rec. 12, Rec. 15, Rec. 29; Cornago & Berg 2024). These definitions are presented as a frame that supports climate-based justifications and foregrounds the question of why CBAM is necessary (European Commission 2024 ; European Union 2023). For this reason, the hierarchy in the EU is organised as a climate-centred main frame and the frames that legitimise it (European Commission 2024 ; European Union 2023).

In EU texts, CBAM, even though it is seen as a climate instrument, is shaped by the EU's framing (European Union 2023; European Commission 2024). Despite this, in the Türkiye and South Africa narratives, it can also be pushed into the background through different problem

definitions (Kılınç 2023; Usta 2024 ; Rumble & Gilder 2023; Burger 2023; van Diemen 2025; Alexander 2024).

In the Türkiye context, the hierarchy differs. Here, the main axis of the debate is constructed around the effect that CBAM will create on export and competition conditions (Kılınç 2023; Usta 2024 ; Dünya Gazetesi, 27 June 2024). The climate target narrative is not completely absent (AA 2023; Usta 2024). For this reason, in Türkiye, competition and compliance cost pressure become the dominant frame (Kılınç 2023; Usta 2024 ; Dünya Gazetesi, 27 June 2024). The climate frame and the transition discourse have a complementary role that explains how this dominant frame will be managed (Usta 2024 ; TİM, n.d.). In addition, it is also stated that CBAM can create a motivation towards green transition and modernisation (TİM, n.d.; Dinçel 2025). Alongside this, it is emphasised that CBAM can also be framed as a transition opportunity aimed at protecting competitiveness (TİM, n.d.; Dinçel 2025).

In the South African context, the main frame is shaped around the perception that CBAM creates an external pressure and an unequal burden-sharing (Rumble & Gilder 2023; Alexander 2024 ; van Diemen 2025). In this context, it is not very likely that the climate frame will move to the centre of the discussion because the issue is mostly not the protection of the climate but related to who carries how much burden and how the political space is affected (Rumble & Gilder 2023; Alexander 2024). For this reason, justice and sovereignty emphases are seen as the main frames, while technical compliance and cost elements are evaluated as complementary (Burger 2023; Wesgro 2024 ; van Diemen 2025). It is stated that, together, they also make the criticisms concrete (Burger 2023; Alexander 2024).

This comparison shows that the same frame does not have the same importance in every country because each context sees CBAM as a different main problem. In the EU, since CBAM is seen as a tool to fulfil climate targets and to prevent negative effects, the climate frame is at the centre (European Union 2023 Rec. 9–10; European Commission 2024). In Türkiye, since the discussion focuses more on access to the EU market and the risk of loss of competitiveness, the competition and compliance frame emerges (Kılınç 2023; Usta 2024 ; Dünya Gazetesi, 27 June 2024; AA 2023). In South Africa, the issue is shaped by the thought that the burden is not shared fairly and that an external policy pressure is created (Rumble & Gilder 2023; Alexander 2024 ; van Diemen 2025). These different priority orders also explain why CBAM is legitimised or questioned in different ways in each context (European Commission 2024 ; Kılınç 2023; Rumble & Gilder 2023).

Responsibility and burden allocation

When the three contexts are compared, there is no common frame regarding who the cost and compliance burden created by CBAM belongs to. In the EU, Türkiye, and South Africa narratives, the burden and responsibility are distributed to different actors. This distribution also directly affects how CBAM is interpreted (European Commission 2024 ; European Union 2023; Kılınç 2023; Usta 2024 ; Rumble & Gilder 2023; Alexander 2024).

In the EU context, responsibility is related to making CBAM function in an orderly way (European Commission 2024 , p. 35; European Commission 2024 , p. 9). CBAM is a mechanism that aims to close the cost difference that arises depending on the embedded emissions of imported products (European Union 2023). The burden is mostly linked to compliance processes such as reporting, verification, and certificates (European Union 2023: Art. 8(1); European Commission 2024 , p. 53). In this framework, the EU is in the position of an actor that sets the rules and makes the system work (European Commission 2024 , p. 25; European Commission 2024 , p. 19). In addition, CBAM is a natural step of equalising the carbon price in the system (European Union 2023).

In the Türkiye context, however, the burden is concentrated more clearly on exporters and producer firms (Kılınç 2023; Usta 2024 ; Dünya Gazetesi, 27 June 2024). CBAM is mostly seen in relation to access to the EU market and the conditions of competition (Kılınç 2023; Usta 2024 ; Dünya Gazetesi, 27 June 2024). The obligation to comply is presented in many sources, especially as a requirement that firms must fulfil (TİM 2024 ; Anadolu Ajansı [AA] 2023). The role of the state is explained through creating the necessary framework so that firms can manage this burden and supporting the transition process (Usta 2024 , p. 10, p. 14; Dinçel 2025, p. 2). For this reason, in the Türkiye narrative, the burden is defined both as the cost in financial terms and as the practical difficulty of the compliance process (Kılınç 2023; Usta 2024 ; Dünya Gazetesi, 27 June 2024; AA 2023).

In the South African context, discussions of responsibility and burden are mostly framed in terms of fairness and burden sharing (van Diemen 2025; Burger 2023; Rumble & Gilder 2023; Alexander 2024). It is stated that CBAM's cost and compliance requirements can lead to heavier consequences for countries such as South Africa, and that this creates an unequal burden (Alexander 2024 ; Creamer 2024 ; Rumble & Gilder 2023). In this framework, conditions such as how much capacity firms have to comply, energy structures, and reporting infrastructure also come to the fore (Burger 2023; Wesgro 2024). In this context, the EU can be seen as the side

that creates the cost and compliance pressure (Rumble & Gilder 2023; Roelf & Abnett 2024). The burden is discussed not only as a technical issue of reporting and compliance, but also as an unfair external pressure (Alexander 2024 ; Rumble & Gilder 2023).

This comparison shows that CBAM puts different actors at the focus. The EU has this burden, which has a technical character to a large extent within the logic of regulation and compliance, while in Türkiye it takes a concrete form with the necessity for firms to preserve their competitiveness (European Commission 2024 ; Kılınç 2023; Usta 2024). In South Africa, this burden is evaluated together with debates on burden sharing and inequality (Rumble & Gilder 2023; Alexander 2024).

This different distribution also explains why CBAM produces different readings of legitimacy in different contexts. The variation in how burdens are distributed constitutes a key basis for why CBAM is legitimised or questioned in different ways across contexts.

Legitimacy and contestation

When the three contexts are compared, it is understood that the main focus of the discussion on CBAM is not what the mechanism is but how legitimate it can be seen (European Union 2023 Rec. 9–10; European Commission 2024 , p. 8). In the EU's narrative, CBAM is evaluated as a necessary regulation for reaching climate targets (European Union 2023 Rec. 9–10; European Union 2023 Rec. 12, Rec. 15, Rec. 29; Cornago & Berg 2024 , pp. 1–3). On the other side, external actors may read the same tool as a commercial intervention (van Diemen 2025; Burger 2023; Rumble & Gilder 2023; Alexander 2024). This distinction is not only a discursive preference, but it also depends on countries capacity to comply with CBAM, their energy structure, and their development priorities (van Diemen 2025; Burger 2023; Rumble & Gilder 2023; Alexander 2024).

In contexts where there is a strong compliance infrastructure, sufficient financing for the low-carbon transition, and the capacity to establish a data reporting system, CBAM is accepted as a more manageable regulation. Also, the probability of being perceived as legitimate is higher (European Union 2023 Art. 32; Cornago & Berg 2024 , pp. 1–3) In contrast, in cases where energy production is dependent on high-emission sources such as coal, where reporting and verification capacity is limited, and where the cost of transition conflicts with development targets, the legitimacy of CBAM can be questioned more easily (van Diemen 2025; Burger 2023; Rumble & Gilder 2023; Alexander 2024). In this case, the discussion moves away from the climate target and turns to questions about whose responsibility the burden is and by whom the

rules are set (TİM 2024 ; Usta 2024 , pp. 10, 16–17; Pacheco, 2026; Rumble & Gilder 2023). Therefore, whether CBAM is framed as a climate tool or as a controversial trade move is largely related to how countries structural conditions evaluate this mechanism (Kılınç 2023; Usta 2024 ; Dinçel 2025, p. 2; TİM, n.d.).

Comparative synthesis

Therefore, the discussion does not evolve only through climate. Practical issues such as reporting, verification, transition, and cost were generally on the agenda (European Commission 2024 ; European Union 2023). The main distinction becomes clear in the questions about the rationale for CBAM and who it burdens. In the EU, CBAM is considered more legitimate as a tool to protect climate targets and prevent carbon leakage (European Commission 2024 ; European Union 2023).

In Türkiye, CBAM is seen more as an obligation that affects exports and the conditions of competition (Kılınç 2023; Usta 2024 ; Schloemer & Lopez 2024 ; Dünya Gazetesi, 27 June 2024; AA 2023). For this reason, the compliance burden becomes more concrete for firms (Kılınç 2023; Usta 2024). In South Africa, CBAM can be seen as a regulation that can create a heavier burden because of conditions such as compliance capacity and energy structure, and therefore triggers justice and sovereignty debates (Rumble & Gilder 2023; Burger 2023; van Diemen 2025; Alexander 2024 ; Roelf & Abnett 2024). For this reason, instead of producing a single universal meaning, CBAM gains meaning again in each context within different legitimacy and burden debates.

Chapter 8 : Conclusion

This thesis shows that CBAM (Carbon Border Adjustment Mechanism) is not understood in the same way in the EU, Türkiye, and South Africa. Although the mechanism is the same, each country defines CBAM through its own experience and perspective. For this reason, the legitimacy of CBAM is discussed differently in each context.

These differences reveal that CBAM is not only a technical emissions pricing instrument. At the same time, CBAM is interpreted as a policy that gains meaning with countries institutional capacities, energy structures, and development priorities. (Entman 1993, p. 52; van Leeuwen 2007, pp. 91–93).

As a result, CBAM is framed around competitiveness/exports and compliance cost in Türkiye, while in South Africa it is framed around justice/sovereignty and unequal burden sharing, and in

this way it gains economic, political, and social meanings (Kılınç 2023; Usta 2024 ; Dünya Gazetesi, 27 June 2024; van Diemen 2025; Burger 2023; Rumble & Gilder 2023; Alexander 2024).

In the EU context, CBAM is presented mainly as a tool to protect climate targets and prevent carbon leakage (European Commission 2024 , pp. 8–10; European Union 2023, Recitals 9–10). In the EU context, the main problem is the risk of weakening climate targets because carbon costs in the EU shift production abroad and make imports advantageous (European Commission 2024 , p. 8; European Union 2023, Recitals 9–10). For this reason, CBAM is legitimate as a necessary step to support climate policy (European Union 2023, Recital 10; Recital 15).

In Türkiye, the main focus of CBAM is on exports and competitiveness. Here, the main problem is whether Türkiye, within an intensive trade relationship with the EU, can protect market access and competitiveness (Kılınç 2023; Usta 2024 ; Dünya Gazetesi, 27 June 2024). For this reason, CBAM is seen as an obligation that imposes costs and compliance pressure on firms (Kılınç 2023; Schloemer & Lopez 2024 ; Usta 2024 , pp. 3, 10–11, 14; AA 2023; Dinçel 2025, p. 2). Although climate targets are mentioned, these targets can often remain in the background (Kılınç 2023; Usta 2024).

In South Africa, CBAM is mostly described not as a technical climate tool but as a regulation imposed from outside that can create unfair outcomes (van Diemen 2025; Burger 2023; Rumble & Gilder 2023; Alexander 2024). Because of a coal-heavy energy structure and limited reporting and compliance capacity, the thought that CBAM will create a disproportionate burden also comes to the foreground (van Diemen 2025; Burger 2023; Rumble & Gilder 2023; Alexander 2024). In this context, the discussion is more focused on justice, sovereignty, and unequal burden-sharing (Alexander 2024 ; Creamer 2024 ; Rumble & Gilder 2023; Roelf & Abnett 2024).

The comparison also clearly shows that the CBAM debate does not start with climate everywhere; in all three contexts, CBAM, in some way, becomes a matter of cost and compliance (Kılınç 2023; Usta 2024 ; Burger 2023; Rumble & Gilder 2023). For this reason, how CBAM will be perceived depends not only on the EU's way of design, but also on the country's capacity to manage this burden and on how the burden is evaluated as belonging to whom (Burger 2023; Wesgro 2024 ; Alexander 2024 ; Rumble & Gilder 2023)

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