

(English version)

**Question for written answer E-002769/25  
to the Commission  
Barbara Bonte (PfE)  
(8 July 2025)**

*Subject:* Conflict of interest and political influence in CBAM expert groups

In June 2025, German newspaper *Die Welt* revealed that several EU-funded NGOs, including Carbon Market Watch, the European Environmental Bureau (EEB) and ECOS, actively participated in the work of CBAM expert groups, which help shape policy regarding the carbon border adjustment mechanism. These organisations received substantial grants from the Commission and, in some cases, the funding accounted for more than a quarter of their total budget. At the same time, representatives of small and medium-sized enterprises (SMEs) have been excluded from these groups time and time again, despite the fact that they are directly concerned by the impact of CBAM. These practices raise serious questions about conflicts of interest and deliberate policy manipulation.

1. Why did the Commission prioritise self-funded NGOs in the composition of CBAM expert groups, and on what grounds were SMEs structurally excluded?
2. How does the Commission ensure impartiality when it funds organisations that simultaneously participate in the work of expert groups which are devising policy?
3. Will the Commission provide full transparency on these practices and agree to an independent investigation into conflicts of interest and political influence in the composition and operation of CBAM expert groups?

Submitted: 8.7.2025

**Answer given by Mr Hoekstra on behalf of the European Commission  
(8 September 2025)**

On 3 November 2023, the Commission published a call for application for membership of a new informal expert group aimed at providing advice and expertise on certain elements of the implementation of the Carbon Border Adjustment Mechanism (CBAM) in its definitive phase as of 2026.

Member States' competent authorities are part of the expert group. Applications were sought from organisations such as European business associations, non-governmental organisations (NGOs) and think tanks with experience in CBAM and Emissions Trading System (ETS) goods, in particular in the monitoring, reporting, quantification, pricing, and verification of embedded emissions. Third countries are also part of the group as observers.

The Commission did not prioritise self-funded NGOs in the composition of the CBAM expert group. NGOs represent a very small share of the participants, which are mainly industry representatives. The call was transparent and open to all interested parties.

The Commission did not examine the funding of the applicant organisations during the review of the applications, as that was not a criterion for acceptance.

Individual companies, including, Small and Medium-sized Enterprises (SMEs), are represented through European industry trade associations, which were deemed to be more representative of the sectors' views, and more useful in terms of providing analytical inputs.

All the organisations which are members of the expert group, including NGOs, academia, research institutes and think tanks were required to be registered in the Transparency Register to be appointed.

There is no conflict of interest and no political influence whatsoever with regard to the composition or the operation of the CBAM expert group.

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