

February 2009 ■ RFF DP 09-02

Comparing Policies to Combat Emissions Leakage

Border Tax Adjustments versus Rebates

Carolyn Fischer and Alan K. Fox

1616 P St. NW
Washington, DC 20036
202-328-5000 www.rff.org

Comparing Policies to Combat Emissions Leakage: Border Tax Adjustments versus Rebates

Carolyn Fischer and Alan K. Fox

Abstract

We explore conditions determining which anti-leakage policies might be more effective complements to domestic greenhouse gas emissions regulation. We consider four policies that could be combined with unilateral emissions pricing to counter effects on international competitiveness: a border tax on imports, a border rebate for exports, full border adjustment, and a domestic production rebate (as might be implemented with output-based allocation of emissions allowances). Each option faces different potential legal hurdles in international trade law; each also has different economic impacts. While all have the potential to support domestic production, none is necessarily effective at reducing global emissions. Nor is it possible to rank order the options. In each case, the effectiveness depends on the relative emissions rates, elasticities of substitution, and consumption volumes. We illustrate these results with simulations for the energy-intensive sectors of two different economies, the United States and Canada.

Key Words: environmental tax, rebate, border tax adjustment, emissions leakage, climate

JEL Classification Numbers: Q2, Q43, H2, D61

© 2009 Resources for the Future. All rights reserved. No portion of this paper may be reproduced without permission of the authors.

Discussion papers are research materials circulated by their authors for purposes of information and discussion. They have not necessarily undergone formal peer review.

Contents

Introduction	1
Background	3
Legal Analysis of Border Adjustment	3
Economic Analysis of Border Adjustment	6
Model	8
Policy Options.....	10
Emissions Price Alone	10
Border Adjustment for Imports.....	11
Border Rebate for Exports	12
Full Border Adjustment	12
Home Rebate.....	13
Costs Not Adjusted	14
Comparing Anti-Leakage Policies	14
Simulations	17
Discussion and Caveats	23
Conclusion	25
References	27
Appendix	31

Comparing Policies to Combat Emissions Leakage: Border Tax Adjustments versus Rebates

Carolyn Fischer and Alan K. Fox *

Introduction

A major stumbling block toward adopting significant policies for reducing greenhouse gas (GHG) emissions has been concern over the lack of emissions pricing on the part of key trade partners. If emissions regulation raises prices for domestic producers, the loss of competitive advantage would lead to the displacement of production and thereby emissions abroad. Currently, the United States, Japan, and the European Union are significant net importers of embodied CO₂ emissions, while China and India are significant net exporters (Peters and Hertwich, forthcoming), and fears are mounting that unilateral carbon pricing will exacerbate this situation. As a consequence, interest has been growing in policies that have the potential to combat leakage.

A popular option is border adjustment, which typically implies requiring importers to pay a tax according to the emissions associated with their product's production, at the same price as faced by domestic producers. This idea has support in the U.S. electricity industry (Morris and Hill 2007). For example, the Lieberman/Warner bill (S. 2191 "America's Climate Security Act") incorporates a requirement for purchasing "international reserve allowances" to cover goods imported from countries that have not undertaken adequate steps to mitigate GHG emissions (Section 1311). The allowance requirement is based on the national (foreign) energy intensity of production in that sector, but is reduced by the share of emissions for which the domestic U.S. sector receives free allocation of allowances. The Bingaman/Specter bill (S. 1766 "Low Carbon Economy Act") includes a weak form of border adjustment by requiring importers to have emissions permits when the emissions in the unregulated (or underregulated) producing country sector increase above a baseline level. The idea of border adjustment of carbon pricing is also gaining ground in Europe (e.g., Godard 2007; Grubb and Neuhoff 2006), as the European Union

* Carolyn Fischer is a Senior Fellow at Resources for the Future. Alan Fox is with the Office of Economics of the United States International Trade Commission (ITC), Washington, DC. The opinions and ideas expressed herein are solely those of the authors and do not represent the views of RFF or the U.S. ITC or any of its individual Commissioners. Support from the Mistra Foundation ENTWINED program is gratefully acknowledged.

is preparing the next phase of the Emissions Trading System (ETS) and considering options in the absence of a major international agreement to cap GHG emissions. Karp and Zhao (2008) argue that trade measures against carbon leakage could help support a new multilateral climate agreement.

However, many trade law experts have concerns that such trade measures may not be compatible with World Trade Organization (WTO) obligations, and we review these arguments in the next section. Others voice apprehensions that unilateral trade measures could poison future climate negotiations (Houser et al. 2008). The U.S. International Trade Representative has expressed worries that such measures could harm trade relations (ICTSD 2008) and has vowed to resist any E.U. attempt to impose climate taxes on U.S. products. Concerns for international relations notwithstanding, fewer people have challenged the notion that import charges would, if allowed, be appropriate and effective at combating leakage and enhancing global emissions reductions.

Conceptually, however, there are several unilateral policy options for dealing with the relative price changes that cause leakage. Import taxes level the playing field for domestic consumption, but do nothing abroad. Border rebates for exports keep the playing field level abroad, but still give imports a competitive advantage at home. Full border adjustment policies combine these two measures, such that only the emissions from domestic consumption are taxed (with an analogy to the way in which value-added taxes are implemented).

A final option is to mitigate the impacts of emissions regulation on domestic production costs by offering rebates to all domestic production, not just exports; we will refer to this type of policy as the “home rebate.” Such a policy could equivalently be implemented by using rate-based mechanisms for regulation or emissions permit allocation (e.g., tradable performance standards or output-based allocation with updating; Fischer 2001). The Lieberman/Warner bill variants have incorporated similar mechanisms by allocating emissions allowances among firms in energy-intensive sectors in proportion to their employment or according to electricity use. The Inslee/Doyle bill (“Carbon Leakage Prevention Act”) proposes to distribute emissions allowances among certain trade-sensitive sectors according to output, multiplied by a sector-based emissions factor. The home rebate keeps the playing field level at home and abroad, but at the expense of opportunities to reduce emissions by reducing consumption.

Indeed, while all these policies have the potential to mitigate leakage, as conventionally defined, it is not clear that they would necessarily enhance the environmental integrity of climate policies from a global perspective. This paper explores the conditions that determine which anti-leakage policies are the most effective complements to domestic GHG emissions regulation. It reveals that while all these policies help to protect domestic production, none of them necessarily

reduces global emissions. Nor is it possible to rank order the options. In each case, the effectiveness depends on the relative emissions rates, elasticities of substitution, and consumption volumes. The subsequent numerical analysis compares the effectiveness of the different policies for different kinds of sectors and economies, using the United States and Canada as examples. The simulations show that the largest share of leakage may arise from the effects of climate policies on energy prices, and while adjustment policies can mitigate leakage on the margin, they are quite limited in terms of reducing global emissions.

Background

In a provocative article, Stiglitz (2006) has argued that not pricing the global external costs of carbon emissions is a *de facto* domestic subsidy that should allow for countervailing duties. While this argument may make economic sense, global trade law is unlikely to accept that the absence of regulation would be an actionable subsidy under the agreement governing Subsidies and Countervailing Measures (SCM) (see, e.g., Bagwati and Mavroidis 2007; Green 2006). Still, no clear opinion exists on the use of trade measures to support the integrity of climate policies, as they have neither been explicitly negotiated nor tested in the dispute settlement process.

The Stiglitz argument is an extension of the “polluter pays principle” by which the efficient allocation of resources in the long run is achieved by ensuring that the polluting party bears the economic burden of the environmental costs. In the case of a transboundary pollutant like GHGs, those parties may lie in other countries. Fischer et al. (2004) note that this principle is not the only fundamental of environmental economics that the legal institutions for international trade do not formally recognize. A second overlooked principle is the economic equivalence of emissions tax and permit regimes. Both introduce an emissions price as a market mechanism for incentivizing pollution reduction; however, one is a tax while the other is a regulation, and they have different legal implications.

As a result, for global pollution problems, the General Agreement on Tariffs and Trade (GATT) may create some barriers to implementing economically justified policies to prevent emissions leakage from more stringently regulated countries. On the other hand, if that is so, some design options might pass legal muster.

Legal Analysis of Border Adjustment

There are several good reviews of the compatibility of GATT/WTO law with climate policy in general and border adjustment options in particular. Pauwelyn (2007), Brewer (2008),

Biermann and Brohm (2005), Kommerskollegium (2004), Zhang and Assunção (2001), Sampson (1998), and Esty (1994) take a primarily legal view. Hoerner and Muller (1997), Fischer et al. (2004), and Ismer and Neuhoff (2004) add an economic perspective. de Cendra (2006) and van Asselt and Biermann (2007) focus on options for incorporating border adjustment into the E.U. ETS in a manner that could be WTO compatible.

The law on border tax adjustment has evolved with major consumption taxes in mind. For example, governments include imports in and exempt exported goods from indirect taxes, such as a value-added tax or sales tax, which are designed to be paid by consumers in the country of destination. The GATT permits adjustment at the border for indirect taxes on “like” products, but not for direct taxes, such as income tax or emissions tax, which are imposed on factors of production in the country of origin. The issue becomes murkier when looking at taxes on products used in the production process. Furthermore, different aspects of GATT law govern the border adjustability of imports versus exports.

Regarding export rebates, the GATT SCM initially specified that taxes on inputs to production are border adjustable only when the goods are “physically incorporated” into the exported products. A revision in the Uruguay Round broadened the category of adjustable taxes to allow export rebates for indirect taxes on goods and services if they are “consumed” in the production of the exported product: in addition to physically incorporated inputs, export rebates are permitted on energy, fuels, and oil used in the production process (SCM, Annex II, footnote 61). Thus, for example, a gasoline tax that may have environmental purposes would be adjustable, because energy is a qualifying material input in the exported products. But an environmental tax on noxious emissions would not be adjustable because pollution is a “disincorporated material output.” However, for policies concerning energy or GHG emissions, it is still unclear whether specific taxes on energy are adjustable, and if so, whether adjustments may only be applied to exports and not to imports.

For import adjustments, two key principles are important. First, the National Treatment principle embedded in Article III of the GATT requires that imported goods be treated no less favorably than “like” domestic products. Second, Most Favored Nation Treatment prohibits WTO members from discriminating among trading partners. These obligations may constrain what level of border adjustment might be allowed. One challenge is calculating the carbon content of imports in a way that does not discriminate against them. Some scholars interpret the trade rules to imply that the tax burden on imports may not be heavier than that on like domestic products (Kommerskollegium 2004). Thus, without clear and comparable metrics, it may be difficult to require payments for actual embodied emissions if they exceed the payments made for like domestic products. Pauwelyn (2007) proposes the option of using the emissions

associated with the predominant method of production in the United States. Alternatively, one might use a benchmark of the best available technology (BAT); Pauwelyn (2007), Godard (2007), and Ismer and Neuhoff (2004) argue that this metric is likely to be allowed, but it is a weaker adjustment factor and would therefore be less effective. Indeed, from an economic perspective, one would *want* to discriminate against more emissions-intensive imports.

Even if they were ruled to be discriminatory, an argument could be made for justifying border adjustments on imports under Article XX, the general exceptions clause (Kommerskollegium 2004; Pauwelyn 2007; Sampson 1998). Three exceptions in that clause may be relevant for building that case: “(b) necessary to protect human, animal or plant life or health; ... (d) necessary to secure compliance with laws or regulations which are not inconsistent with the provisions of this Agreement . . . ; (g) relating to the conservation of exhaustible natural resources if such measures are made effective in conjunction with restrictions on domestic production or consumption.” The latter exception may be particularly relevant for energy products and for the climate. Still, acceptance of such arguments is not assured; furthermore, this analysis reveals that the validity of the assertion that border adjustments contribute to the conservation of the climate is not assured.

A further complication regards the method of adjustment; while economists would note that an allowance requirement for imports has similar effects to a tariff, the law is likely to make a distinction. Pauwelyn (2007) argues that an expansion of the law to allow for border adjustability for carbon taxes does not necessarily imply that regulations are adjustable: “Indeed, the Agreement on Subsidies and Countervailing Measures only allows adjustment upon exportation (i.e. rebates) for taxes or duties, not for regulations” (27). Thus, it may be difficult to use a tax to adjust a cap-and-trade system at the border, particularly for rebates. However, one might still be able to extend carbon regulation to imports. Some case law indicates that if the regulations are deemed to be sufficiently product-related, an argument for comparable requirements for imports could be made. Morris and Hill (2007) make a similar point, that while a border adjustment tax would likely not be WTO compatible, an emissions permit requirement for imports should be. Brewer (2008) concurs that an emissions permit purchase requirement for imports is more likely to qualify as an environmental regulation allowable under the Article XX(g) exception.

Another challenge is permit allocation. de Cendra (2006) and Hepburn et al. (2006) argue that auctioning may be a prerequisite for border adjustment, since the free allocation of permits through grandfathering might then appear to be an unfair subsidy. Similarly, Pauwelyn (2007) points out that adjustment taxes on imports would likely have to be reduced in proportion to the free allocation of emissions permits to comparable sectors in the United States. These legal

arguments run counter to the fact that grandfathering permits has little economic incentive effect, being a transfer.

Output-based allocations, on the other hand, function as a rebate (or subsidy) to production, which does have incentive effects. An open question is whether such rebates or allocations would raise SCM issues. Again, it might be difficult to combine product-specific tax rebates with a cap-and-trade system, but permit allocations embedded in a domestic climate regulation are unlikely to raise eyebrows, unless significant overallocations are perceived. In the European Union, however, rebates and allocations would also have to navigate State Aid rules that are more stringent than those in the WTO.

Most of the restrictions that multilateral trade agreements pose for market-based climate policies remain speculative at this point. As Fischer et al. (2004) summarize, a confluence of several events must occur for these speculations even to be tested. Emissions taxes and tradable permit systems must be sufficiently widespread and/or stringent as to have significant effects on export industries for offsetting policies to be called for. For those aspects of climate policy to be challenged under the GATT, a member country must show not only inconsistency with some rule but also harm from the resulting trade impacts. Furthermore, to prove that the policy is not worthy of exception under Article XX, the complainant must show that a less trade-restrictive policy option is available and effective, or possibly even that the policy does not contribute toward achieving a reasonable climate goal at all.

Even if some measures would be considered illegal under WTO law, Sampson (1998) notes that future climate agreements can still provide for them without problem as long as Parties to the Agreement voluntarily agree to forgo their WTO rights. Still, this former Director of the Trade and Environment Division of the WTO calls for revisiting key WTO provisions for clarification.

Economic Analysis of Border Adjustment

Economic analysis of border adjustment policies is rooted in the effects of climate policy on “competitiveness,” a broad term that can encompass changes in trade flows, terms of trade, carbon leakage, and domestic economic indicators like employment or production. Reinaud (2005), in a review of the potential competitiveness impacts of the E.U. ETS on energy-intensive industries, defines competitiveness for her purposes as “the firm’s ability to maintain and/or expand market position based on its cost structure” (17). We will similarly focus on changes in production in this study. However, Aldy and Pizer (forthcoming) find that only a portion of the

production loss is due to changes in international competitiveness; the majority of the production response to energy price increases reflects reduced consumption.

Studies of the first phase of the E.U. ETS have found little evidence of significant effects on competitiveness (Reinaud 2008); however, emissions prices were quite low in the first phase, and competitiveness impacts and leakage could loom larger as the cap is tightened. Looking toward future phases, Grubb and Neuhoff (2006) raise three options to address competitiveness issues and protect the security of low-carbon investments. The first is to negotiate international agreements for all major competitors to engage in similar carbon-reducing efforts in their mobile, energy-intensive sectors. Second, in the absence of such agreements, they propose the use of border tax adjustments. The third option is to employ output-indexed allocation of emissions allowances.

Each of these options has been explored individually by economists, many of whom use similar multicountry, multisector static general equilibrium models based on GTAP-E. For example, Babiker and Rutherford (2005) compare a reference case of Kyoto-style emissions targets without border adjustment to adjustment measures including import tariffs, export rebates, exemption of energy-intensive industries, and voluntary export restraints on the part of noncoalition countries. They focus on the impacts by country (rather than by sector) and find that the exemptions produce the least leakage overall but are associated with higher carbon prices, while from a welfare perspective, most countries prefer tariffs. Peterson and Schleich (2007) investigate border tax adjustment options for the E.U. ETS, concentrating on the calculation of the carbon content for imports, which affects the stringency of the border tax. Fischer and Fox (2007) investigate designs for domestic rebate programs, combining output-based allocation of emissions permits (revenues) with an emissions pricing program. Their model also considers interactions with labor tax distortions, and they show that output-based rebating (designed appropriately) can generate lower leakage and higher welfare than grandfathering and even than auctioning in some circumstances.

Other papers have analyzed leakage in specific sectors. In the cement industry, Ponsard and Walker (2008) find that the E.U. ETS is likely to induce a high level of carbon leakage through increased imports and production relocation. Demailly and Quirion (2006) use a detailed spatial model of the cement industry to compare two combinations of a CO₂ tax with border adjustment. In the first case, the border adjustment is based on actual emissions intensities, both for export rebates and for import taxes. In the second scenario, the border adjustment corresponds to the BAT, with rebates given according to the least CO₂-intensive technology available at a large scale, and imports are taxed to the same level. They find that carbon leakage decreases in both cases, and foreign emissions even decrease in the first case. However, border

adjustment also causes the cement price in the regulated countries to increase, further impacting their cement consumers. Demailly and Quirion (2008a) perform some similar analysis for the iron and steel industry and include updating allocation options; they find little competitiveness effect from the E.U. ETS. Demailly and Quirion (2008b) compare border adjustments and allocation options for cement, steel, and aluminum in the European Union. Gielen and Moriguchi (2002) simulate the effects of carbon pricing on the Japanese iron and steel industry, finding leakage rates of 70 percent and calculating the import tariffs needed to balance that. Ho et al. (2008) analyze the competitiveness effects of a \$10/ton CO₂ price in the United States and find considerable leakage in some sectors.

While economic modelers have addressed particular trade-related and allocation-related options for addressing leakage individually or for specific sectors, no one has compared them comprehensively. The goal of this paper is to do this in an intuitive and transparent fashion. The next section introduces a simple analytical model to illustrate the incentive effects of the different policies. The subsequent section parameterizes that model for the key sectors likely to be covered by a carbon policy. Results are presented for the United States and Canada, with some sensitivity analysis using alternate scenarios, followed by discussion, caveats, and directions for further research.

Model

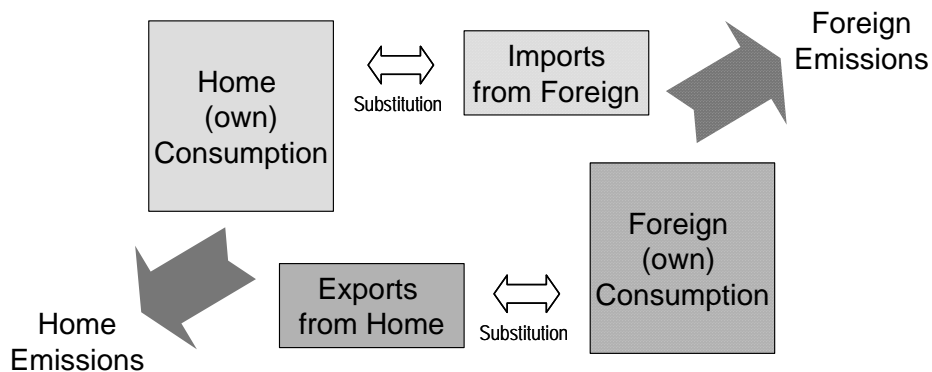
The basic issues of international emissions leakage within a given sector can be addressed parsimoniously with a two-country, two-good, partial equilibrium model. Since we are ultimately taking a sector-specific focus rather than an economy-wide perspective, we do not require a general equilibrium, although these aspects will be discussed in the numerical section. While general equilibrium effects have significant implications for the climate policy itself, they have smaller effects regarding most adjustment measures.

Consider two countries, Home and Foreign. Home produces good H at a per-unit cost $c_H(r_H)$ that rises with reductions r_H from its baseline emissions rate e_H^0 . For notational simplicity, let $c_H^0 = c_H(0)$. Foreign produces good F at a per-unit cost c_F , which does not depend on its emission rate, since it does not have an incentive to reduce emissions. Producers are perfectly competitive. Global emissions are $E = (e_H^0 - r_H)H + e_F F$.

Each country has a representative consumer that demands some of each good. Let home and foreign consumption of good H be h and x (exports), respectively, and let home and foreign consumption of good F be m (imports) and f , respectively. Consumer demand for each good is a simple function of the prices of both competing goods in the country of

consumption: $h(p_H, p_M)$, $m(p_H, p_M)$, $x(p_X, p_F)$, and $f(p_X, p_F)$. Those prices in turn will equal the (constant) marginal costs of production, inclusive of any taxes or rebates. The resulting demand will determine production and, along with the emissions intensities, total emissions. Figure 1 illustrates this stylized model.

Figure 1. Stylized Model



Formally, in the market equilibrium,

$$H = h(p_H, p_M) + x(p_X, p_F)$$

$$F = f(p_H, p_M) + m(p_X, p_F)$$

Let us assume constant elasticity of demand functions, so

$$h = \alpha_h p_H^{\eta_{hH}} p_M^{\eta_{hM}}$$

$$m = \alpha_m p_H^{\eta_{mH}} p_M^{\eta_{mM}}$$

$$x = \alpha_x p_X^{\eta_{xX}} p_F^{\eta_{xF}}$$

$$f = \alpha_f p_X^{\eta_{fX}} p_F^{\eta_{fF}}$$

Own-price elasticities are negative, while cross-price elasticities are assumed to be positive. With this formulation, a first-order approximation of the change in demand is

$$dh = \eta_{hH} h \frac{dp_H}{p_H} + \eta_{hM} h \frac{dp_M}{p_M}, \text{ etc.}$$

Our metric of home competitiveness is the change in domestic production. Simplifying, we get

$$dH = h \left(\eta_{hH} \frac{dp_H}{p_H} + \eta_{hM} \frac{dp_M}{p_M} \right) + x \left(\eta_{xX} \frac{dp_X}{p_X} + \eta_{xF} \frac{dp_F}{p_F} \right) \quad (1)$$

Leakage is conventionally defined as the change in foreign emissions as a share of the change in domestic emissions induced by the policy. From a policy effectiveness point of view, however, the change in global emissions is what matters, and we focus on this variable:

$$\begin{aligned} dE = & -dr_H H + (e_H^0 - r_H) \left(h \left(\eta_{hH} \frac{dp_H}{p_H} + \eta_{hM} \frac{dp_M}{p_M} \right) + x \left(\eta_{xX} \frac{dp_X}{p_X} + \eta_{xF} \frac{dp_F}{p_F} \right) \right) \\ & + e_F \left(m \left(\eta_{mH} \frac{dp_H}{p_H} + \eta_{mM} \frac{dp_M}{p_M} \right) + f \left(\eta_{fX} \frac{dp_X}{p_X} + \eta_{fF} \frac{dp_F}{p_F} \right) \right) \end{aligned} \quad (2)$$

Within this framework, we next evaluate some proposed border adjustment policies for their ability to enhance the global effectiveness of a domestic emissions pricing policy. We also assess the extent to which the policy options temper reductions in domestic production, as an indicator both of the competitiveness concerns and of pressures for protection.

Policy Options

In the absence of any climate policy, prices are simply the marginal production costs without reductions: $p_H = p_X = c_H^0$, and $p_F = p_M = c_F$. First, to see the effects of the climate policy alone, we impose an emissions price t . Next, to compare different policies for controlling emissions leakage, we start from a reference scenario of this domestic emissions pricing program: all of the adjustment scenarios will retain that price and the corresponding reduction in emissions intensity in home production. Furthermore, since we are evaluating the imposition of the full policies, rather than a marginal increase in the rate, we assume $dr_H = r_H$.

Emissions Price Alone

In principle, an emissions price can be implemented either by a tax or a cap-and-trade program. For our purposes, let us model the policy as a carbon tax (“Ctax”), to operate with a consistent price across scenarios. The implicit assumption is that changes in a given sector do not affect the emissions price; this situation would also occur in an emissions cap framework if the

sector is fairly small, if international or intertemporal linking occur, or if a safety valve (price ceiling) is binding.

With an emissions price t in the home country and no adjustment mechanisms, $p_H = p_X = c_H(r_H) + t(e_H^0 - r_H)$ and $p_F = p_M = c_F$. In other words, domestically produced goods see their prices rise not only due to changes in their production costs, but also due to the additional emissions payments associated with each unit of output. Prices of foreign-produced goods remain unchanged.

Substituting these prices and changes into (2) and simplifying, we see the change in global emissions is

$$dE_{\text{Ctax}} = -r_H H + \frac{c_H - c_H^0 + te_H}{c_H^0} \left(e_H (\eta_{hH} h + \eta_{xX} x) + e_F (\eta_{mH} m + \eta_{fX} f) \right).$$

where $e_H = (e_H^0 - r_H)$ is shorthand for the home emissions rate in the presence of the emissions price. The first effect of the emissions price is to reduce the emissions rate for all home production; the second effect is to raise the price of the home good, which causes substitution effects across all goods, with corresponding emissions changes.

Simplifying (1), we see the change in domestic production that results from the price changes:

$$dH_{\text{Ctax}} = \frac{c_H - c_H^0 + te_H}{c_H^0} (\eta_{hH} h + \eta_{xX} x).$$

Border Adjustment for Imports

This policy attempts to level the playing field between the home good and imports for domestic consumption by ensuring that imports are equally penalized for the emissions associated with their production. Let this import tax policy be denoted by the subscript “ImpTax.” It combines an emissions price in the home country with a tax on the emissions “embodied” in imports of the foreign good into the home country. Since the definition of embodied emissions is also a policy choice, we denote the defined emissions intensity as \hat{e}_F . Consequently, the price impacts of this policy are $p_H = p_X = c_H(r_H) + t(e_H - r_H)$, $p_M = c_F + t\hat{e}_F$, and $p_F = c_F$. In the base case, $\hat{e}_F = e_F$, the actual emissions intensity. However, many of the proposed border adjustment policies that are thought to be WTO compatible involve a smaller border tax. Some propose using home emissions intensity ($\hat{e}_F = e_H$), or BATs. The

Bingaman/Specter proposal only imposes the tax on embodied emissions above some baseline (essentially, $\hat{e}_F = e_F - e_F^0$).

Simplifying the changes in global emissions, we get

$$dE_{\text{ImpTax}} = -r_H H + \frac{c_H - c_H^0 + te_H}{c_H^0} \left(e_H (\eta_{hH} h + \eta_{xX} x) + e_F (\eta_{mH} m + \eta_{fX} f) \right) + \frac{t\hat{e}_F}{c_F^0} (e_H \eta_{hM} h + e_F \eta_{mM} m)$$

Thus, we have the same direct effects of the emissions price, plus an additional effect on home and import consumption due to the increased price of imports.

The change in domestic production is then

$$dH_{\text{ImpTax}} = \frac{c_H - c_H^0 + te_H}{c_H^0} (\eta_{hH} h + \eta_{xX} x) + \frac{t\hat{e}_F}{c_F^0} (\eta_{hM} h).$$

Border Rebate for Exports

Contrary to the border tax on imports, offering a border rebate for exports attempts to level the playing field abroad. This export rebate policy (“ExpReb”) rebates the value of the emissions embodied in exports, so that they do not face a competitive disadvantage in foreign markets, but maintains the full emissions pricing at home: $p_H = c_H(r_H) + t(e_H - r_H)$,

$p_X = c_H(r_H)$, and $p_F = p_M = c_F$.

Simplifying the change in emissions, we get

$$dE_{\text{ExpReb}} = -r_H H + \frac{c_H - c_H^0 + te_H}{c_H^0} (e_H \eta_{hH} h + e_F \eta_{mH} m) + \frac{c_H - c_H^0}{c_H^0} (e_H \eta_{xX} x + e_F \eta_{fX} f)$$

Thus, the price change for exports, and the corresponding impacts on emissions from exports and foreign good consumption, are smaller than with the emissions tax alone.

The change in domestic production is then

$$dH_{\text{ExpReb}} = \frac{c_H - c_H^0 + te_H}{c_H^0} (\eta_{hH} h) + \frac{c_H - c_H^0}{c_H^0} (\eta_{xX} x)$$

Full Border Adjustment

Full border adjustment combines the previous two policies, forgiving the value of the emissions embodied in exports and taxing the emissions embodied in imports. This adjustment essentially turns the emissions price into a destination-based tax, much like most revenue-raising

consumption taxes. The corresponding price changes are $p_H = c_H(r_H) + t(e_H - r_H)$, $p_X = c_H(r_H)$, $p_M = c_F + t\hat{e}_F$, and $p_F = c_F$.

The changes in emissions due to this combined policy reduce to

$$dE_{\text{FullBTA}} = -r_H H + \frac{c_H - c_H^0 + te_H}{c_H^0} (e_H \eta_{hH} h + e_F \eta_{mH} m) \\ + \frac{c_H - c_H^0}{c_H^0} (e_H \eta_{xX} x + e_F \eta_{fX} f) + \frac{t\hat{e}_F}{c_F} (e_H \eta_{hM} h + e_F \eta_{mM} m)$$

These effects are also a combination of those from the border tax and rebate policies, which is also evident when we simplify the effects on domestic production.

$$dH_{\text{FullBTA}} = \frac{c_H - c_H^0 + te_H}{c_H^0} (\eta_{hH} h) + \frac{c_H - c_H^0}{c_H^0} (\eta_{xX} x) + \frac{t\hat{e}_F}{c_F} (\eta_{hM} h)$$

Home Rebate

The home rebate (“HomeReb”) directs the full value of the emission rents to be rebated to producers of the home good, whether for domestic consumption or exports. In other words, while the emissions price induces reductions in the emissions rate, the tax is not imposed on the emissions embodied in an additional unit of output: $p_H = p_X = c_H(r_H)$ and $p_F = p_M = c_F$.

This policy mimics an intensity-based regulation, and can be implemented that way, or by output-based rebating of emissions payments (as in the Swedish NO_x tax-rebate program), or by rate-based allocation of emissions permits in a cap-and-trade policy (see Fischer 2001; Fischer and Fox, 2007). Because it does not tax embodied emissions, this policy is only effective to the extent opportunities exist to reduce emissions in production processes, as opposed to reducing consumption of the good.

Simplifying the change in global emissions, we get

$$dE_{\text{HomeReb}} = -r_H H + \frac{c_H - c_H^0}{c_H^0} (e_H (\eta_{hH} h + \eta_{xX} x) + e_F (\eta_{mH} m + \eta_{fX} f))$$

Thus, the full rebate mitigates the substitution impacts induced by the increase in the price of the domestically produced good. Like all the policies, it retains the direct effect of emissions rate reductions induced by the emissions price.

The effect on domestic production is

$$dH_{\text{HomeReb}} = \frac{c_H - c_H^0}{c_H^0} (\eta_{hH} h + \eta_{xX} x).$$

Costs Not Adjusted

Notice that none of the policies address the cost increases due to changes in production methods to reduce emissions ($c_H - c_H^0$); rather, they only impose or remove the carbon tax costs of the remaining emissions associated with production. Thus, the adjustment policies defined here will only offset a large portion of the competitiveness change if these tax costs are large relative to the costs of fuel switching and improving energy efficiency. The other costs ignored in this partial equilibrium framework are upstream cost increases, such as electricity price rises (a particular concern for aluminum, for example). Some proposals would include adjustment for these cost changes as well as emissions payment requirements; none to date would address the costs of changing production techniques.

Comparing Anti-Leakage Policies

How do these policies compare in terms of reducing competitiveness impacts and ensuring more genuine emissions reductions globally? All the policies either raise the cost of foreign-sourced goods or lower the cost of home-produced goods. As a result, all adjustment policies raise domestic output relative to the tax alone (assuming the substitution elasticities are well behaved); they also raise domestic emissions. Furthermore, they all reduce foreign output relative to the tax alone, and thereby reduce foreign emissions. Consequently, they do not necessarily reduce global emissions, since displaced foreign emissions are to some extent replaced by domestic emissions. Nor do they necessarily reduce leakage, as conventionally defined, since they both decrease the numerator of foreign increases and denominator of domestic reductions. Nor is it possible to rank order the options. In each case, the effectiveness depends on the relative elasticities of substitution, size, and emissions rates.

Table 1. Comparison of Effects of Adjustment Policies on Competitiveness

	Additional Domestic Production Relative to Tax Alone
Import tax	$(t\hat{e}_F / c_F^0)\eta_{hM}h$
Export rebate	$(te_H / c_H^0)(-\eta_{xX})x$
Full border adjustment	$(te_H / c_H^0)(-\eta_{xX})x + (t\hat{e}_F / c_F)\eta_{hM}h$
Home rebate	$(te_H / c_H^0)(-\eta_{hH}h - \eta_{xX}x)$

First, compare the effects on domestic production, our measure of competitiveness ($dH_i - dH_{\text{Ctax}}$, for each policy i), as summarized in Table 1. Since the border tax and the border rebate each raise domestic production, the full border adjustment dominates either of its single components. However, it does not necessarily dominate the home rebate:

$$dH_{\text{FullBTA}} - dH_{\text{HomeReb}} = \left(\frac{t\hat{e}_F}{c_F}(\eta_{hM}) - \frac{te_H}{c_H^0}(-\eta_{hH}) \right) h. \text{ Both policies mitigate the cost increase for}$$

exports, so which policy induces more home production depends on the relative cost changes for imported and domestic goods and whether home good consumption is more sensitive to home or import price changes.

The impacts of adjustment policies on global emissions are less obvious. A policy i will provide additional global emissions reductions if its changes in emissions are smaller (more negative) than those induced by the emissions price alone; that is, if $dE_{\text{Ctax}} - dE_i > 0$. Table 2 presents these additional emissions reductions for each of our policy options, and it makes apparent that none of these policies *necessarily* reduces leakage.

Table 2. Comparison of Effects of Adjustment Policies on Global Emissions

	Additional Emissions Reductions Relative to Carbon Tax Alone
Import tax	$\frac{t\hat{e}_F}{c_F^0} \left(\underbrace{-\eta_{hM}}_{-} e_H h - \underbrace{\eta_{mM}}_{+} e_F m \right)$
Export rebate	$\frac{te_H}{c_H^0} \left(\underbrace{\eta_{xX}}_{-} e_H x + \underbrace{\eta_{fX}}_{+} e_F f \right)$
Full border adjustment	$\frac{te_H}{c_H^0} \left(\underbrace{\eta_{xX}}_{-} e_H x + \underbrace{\eta_{fX}}_{+} e_F f \right) + \frac{t\hat{e}_F}{c_F^0} \left(\underbrace{-\eta_{hM}}_{-} e_H h - \underbrace{\eta_{mM}}_{+} e_F m \right)$
Home rebate	$\frac{te_H}{c_H^0} \left(e_H \left(\underbrace{\eta_{hH}}_{-} h + \underbrace{\eta_{xX}}_{-} x \right) + e_F \left(\underbrace{\eta_{mH}}_{+} m + \underbrace{\eta_{fX}}_{+} f \right) \right)$

The border tax on imports reduces emissions relative to the tax if the displaced emissions from fewer imports exceeds the increased emissions from more domestic consumption (i.e., if $-\eta_{mM}e_F m > \eta_{hM}e_H h$). This result is more likely, the larger the elasticity of demand for imports, foreign emission rate, and import volume relative to the domestic emissions rate, home consumption, and the elasticity of home demand with respect to the import price.

The export rebate reduces emissions relative to the tax if the displaced emissions from less foreign consumption exceeds the increased emissions from the additional exports (if $\eta_{fX}e_F f > -\eta_{xX}e_H x$). This result is more likely, the greater is the substitutability between exports and the foreign good, the larger are the foreign good emissions, and the more inelastically demanded are exports. The export rebate may or may not be more effective than the import tax, depending if the net emissions displaced by the additional exports in the rebate case exceed the net emissions reductions from fewer imports with the import tax.

The full border adjustment policy combines the preceding two policies. If each of these policies is effective on its own, then the combination will result in fewer global emissions than either an import tax or export rebate alone. If only one of these policies is effective, then that policy dominates full border adjustment, which in turn dominates the ineffective policy.

The home rebate is effective in its own right if the displaced foreign emissions exceed the additional home emissions. The home rebate also provides more reductions than the export

rebate alone if the displaced emissions from fewer imports exceeds the increased emissions from more domestic consumption (if $\eta_{mH}e_F m > -\eta_{hH}e_H h$). Note that this condition differs from that for the import tax being effective, since the different relevant elasticities are those with respect to the home good price rather than the import price. This result is more likely, the more sensitive are imports to the home good price, the larger are emissions from imports, and the less price-sensitive is the home good. Since both policies affect the export market similarly, full border adjustment is more effective than the home rebate if the change in emissions from different import levels outweighs the change in emissions from different home good consumption.

Overall, however, little can be said definitively without understanding the relative magnitude of the elasticities, emissions rates, and consumption volumes. *Any* of these policies could potentially dominate. Furthermore, it may be that *none* of the adjustment policies is warranted from a global perspective, such as if demand for foreign-produced goods is highly inelastic (i.e., $\eta_{mH}, \eta_{mM}, \eta_{FX}$ all close to zero).

In the next section, we illustrate the results by parameterizing this model with estimates from different sectors that are likely to be regulated for GHG emissions. We also select two countries (the United States and Canada) with very different profiles in terms of trade sensitivities and emissions intensities for these sectors.

Simulations

Fischer and Fox (2008) use a computable general equilibrium (CGE) model of global trade (based on GTAP-EG in GAMS) to simulate the effects of a \$50/ton C emissions price implemented unilaterally in the United States and applied to certain emissions-intensive sectors. We utilize these and additional simulations from this complex model to parameterize the analytical model that makes the trade-offs among border adjustment policies more transparent.

Specifically, for the parameterized model, we assume simple functional forms with constant elasticity of substitution, so that the change in production for good i (i.e., h, m, f , or x) is

$$\Delta q_i = Q_{i0} \left(\left(\frac{p_i}{p_{i0}} \right)^{\eta_{ii}} \left(\frac{p_j}{p_{j0}} \right)^{\eta_{ij}} - 1 \right),$$

where Q_{i0} is baseline production, p_i and η_{ii} are its own price and

elasticity, while p_j and η_{ij} are the relevant cross price and elasticity. We focus here on the covered sectors separately: electricity (ELE); refined petroleum products (OIL); chemicals (CRP); nonmetallic minerals (NMM), which includes some ceramic production; pulp, paper, and print (PPP); and iron and steel (I_S). The cost of these simplifications is that we ignore cross-price and income effects that influence energy demands in other sectors, as well as terms-of-

trade effects. However, we calibrate these parameters by using the results from the CGE model as in Fischer and Fox (2007, 2008). An advantage of these simplifications is that, unlike in the complex CGE model, we can easily perform sensitivity analysis.

From the \$50/ton C experiment, we derive the emissions, prices, and quantities in response to the carbon price, including the predicted leakage and production changes, in the absence of any adjustment policies.¹ To calculate marginal changes from this new baseline, we then add a small production tax in the covered sectors that raises the prices of h and x by 0.01 percent, which allows us to estimate the elasticities $\eta_{hH}, \eta_{mH}, \eta_{xX}, \eta_{jX}$ as well as the emissions intensities of the changes in foreign production. In this manner, we control for the larger effects of the emissions pricing on the average responses and focus on the marginal responses attributable to production cost changes, which is the mechanism of the adjustment policies. The parameters η_{mM}, η_{hM} were estimated from the same model by imposing increases in the tariff, also on a sector-by-sector basis, of 0.1 percent. Since the foreign good price does not change in our simulations, the elasticities η_{jF}, η_{xF} do not come into play.² (All relevant elasticities are reported in the Appendix).

Most studies of leakage focus on average leakage, conventionally defined as the change in the foreign sector's emissions as a share of the reduction in the domestic sector's emissions. We distinguish between this average leakage, which reflects the relative changes in emissions induced by the overall carbon price, and marginal leakage—that is, the change in the foreign sector's emissions as that are induced by production price changes in that sector. These are the effects relevant for the adjustment policies, and the distinction turns out to be an important one.

Much of the increase in foreign emissions arises due to the general equilibrium effects of the emissions price, which not only changes the relative prices of manufactured goods, but also drives down fossil fuel prices globally, due to the large-scale withdrawal of demand from the United States. For example, foreign OIL sector prices fall about 0.5 percent (while domestic prices rise 4.3 percent), and similar declines in other fossil fuel prices lead to a small drop in foreign electricity prices, and in turn increase fuel use, carbon intensities, and emissions abroad.

¹ This scenario includes revenue recycling, but in terms of leakage and the changes induced by border adjustments and rebate policies, the results are quite similar to those with emissions permit grandfathering.

² Even for a large economy like the United States, foreign price changes are not significant for the covered energy-intensive sectors, with the exception of petroleum products and electricity; still, the equilibrium quantity reactions are implicit in our parameterization.

Table 3 shows that average leakage rates in the modeled scenario range from 64% for OIL and 60% for steel to 8% for electricity, a high rate for a sector with negligible trade (Table 4). Average leakage is thus highly sensitive to the parameterization of fossil fuel supply curves (Burniaux and Martins 1999). However, energy price–driven leakage is less important for comparing anti-leakage policies. Unlike the carbon price, border adjustments and rebates based on production do little to change relative fuel prices. Thus, these energy price changes remain in the background and are to a large extent unavoidable.

Marginal leakage rates from production shifting can actually be quite high—indeed, they determine whether an adjustment policy is environmentally effective. However, in scope, relative to total reductions, the leakage attributable to shifts in production turn out to be a small part of the average leakage rate, as the production changes are relatively small (Table 3).

Table 3. Measures of Competitiveness and Carbon Leakage for the U.S.

	ELE	OIL	CRP	NMM	PPP	I_S
Baseline production change, % from no policy	-6.1%	-4.4%	-1.1%	-0.9%	-0.3%	-0.6%
Baseline leakage, 1000 MtC	10153	5969	801	791	138	489
Baseline leakage rate, % of sector reductions	8%	64%	20%	39%	11%	60%
Leakage due to production changes, % of sector reductions	3%	57%	6%	14%	2%	14%

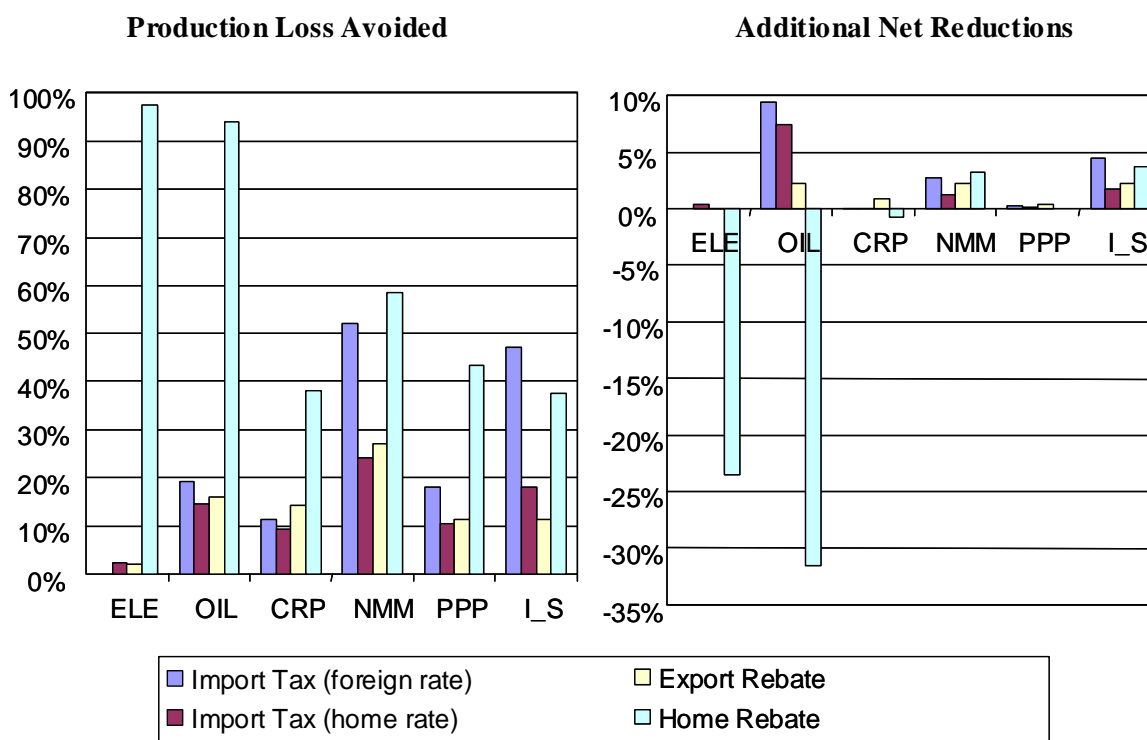
Table 4 reports many of the factors that indicate the scope for leakage from the United States. In the baseline (2001, for the GTAP model), the export intensities of production and import intensities of consumption range from nearly zero percent for electricity to 15 percent in some sectors. The relative emissions intensity is the emissions intensity of (marginal) foreign production as a percentage of the average emissions intensity of domestic production. For chemicals and pulp and paper, foreign intensities are quite similar to domestic ones, but they are lower for electricity and higher for the other sectors.

Table 4. Trade Shares and Relative Emissions Intensities for the United States

	ELE	OIL	CRP	NMM	PPP	I_S
Baseline export share of home production	0%	5%	13%	11%	5%	5%
Baseline import share of home consumption	1%	11%	14%	15%	6%	11%
Foreign emissions intensity relative to U.S.	98%	143%	118%	215%	168%	295%
Emissions payments as % of cost increase	103%	101%	46%	78%	59%	46%

The contraction in production that accompanies the carbon price is, in the baseline, roughly 1 percent or less for energy-intensive manufacturing in the United States (Table 3). The left side of Figure 2 reports the effectiveness of the different anti-leakage policies on stemming the loss in production. For most sectors, the home rebate is the most effective single policy. Iron and steel production and nonmetallic minerals benefit strongly from the import tax, at least when imports are taxed according to the foreign emissions intensity. Full border adjustment, the sum of the import tax and export rebate, is the most effective policy for these sectors when foreign embodied emissions are fully taxed.

Figure 2. Results of Adjustment Policies for the United States



The right side of Figure 2 depicts the additional net reductions achieved relative to the emissions tax policy alone as a percentage of the domestic reductions under that scenario. We find that, with the exception of petroleum products, the policies achieve less than an 8 percent improvement in net emissions reductions. Full border adjustment (at the foreign emissions intensity) is most effective, but only weakly so for several sectors. Since foreign emissions rates are higher in all sectors but electricity, any weakening of the import adjustment by using domestic or BAT emissions intensities to calculate the adjustment produces smaller results. When the import adjustment is restricted to the comparable domestic tax, the home rebate is more effective for steel and of comparable effectiveness for the other energy-intensive manufacturing sectors. However, the home rebate actually increases global emissions when applied to electricity and petroleum products, as the domestic expansion (from lower home energy prices) exceeds any foreign reduction.

We conduct the same analysis for Canada, which exhibits a different economic structure. Larger shares of Canadian goods are traded (Table 5), but as a smaller country, the foreign response is smaller (see elasticity tables in the Appendix). Furthermore, the emissions intensities of displaced foreign goods are closer to parity and occasionally lower than domestic intensities (Table 5).

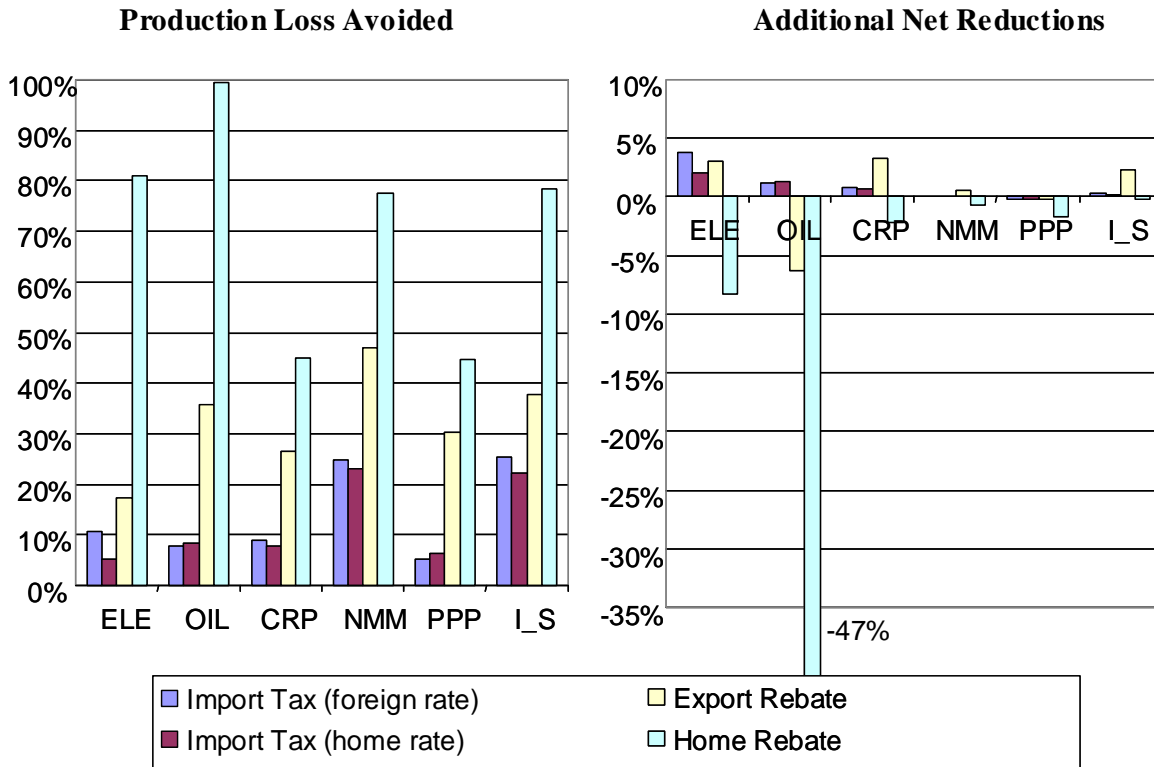
Table 5. Trade Shares and Relative Emissions Intensities for Canada

	ELE	OIL	CRP	NMM	PPP	I_S
Export share of home production	5%	15%	46%	33%	44%	21%
Import share of home consumption	3%	9%	51%	42%	22%	26%
Emissions rate ratio (foreign to domestic)	216%	89%	115%	107%	80%	115%
Emissions payments as % of cost increase	92%	89%	48%	78%	49%	58%

The results of the border adjustment policies are displayed in Figure 3. For Canada, there is little difference between the border tax adjustment for imports based on domestic or foreign emissions intensities. None of the policies really improve net reductions in nonmetallic minerals and pulp and paper. For the other sectors, full border adjustment is most effective, improving net reductions by 4–10 percent. Of the single policies, the export rebate most often delivers the greatest net reductions, in large contrast to the U.S. case, where the import tax was more effective. While the home rebate is across the board the most effective at avoiding lost production, and reasonably effective at avoiding leakage in the manufacturing sectors, it is

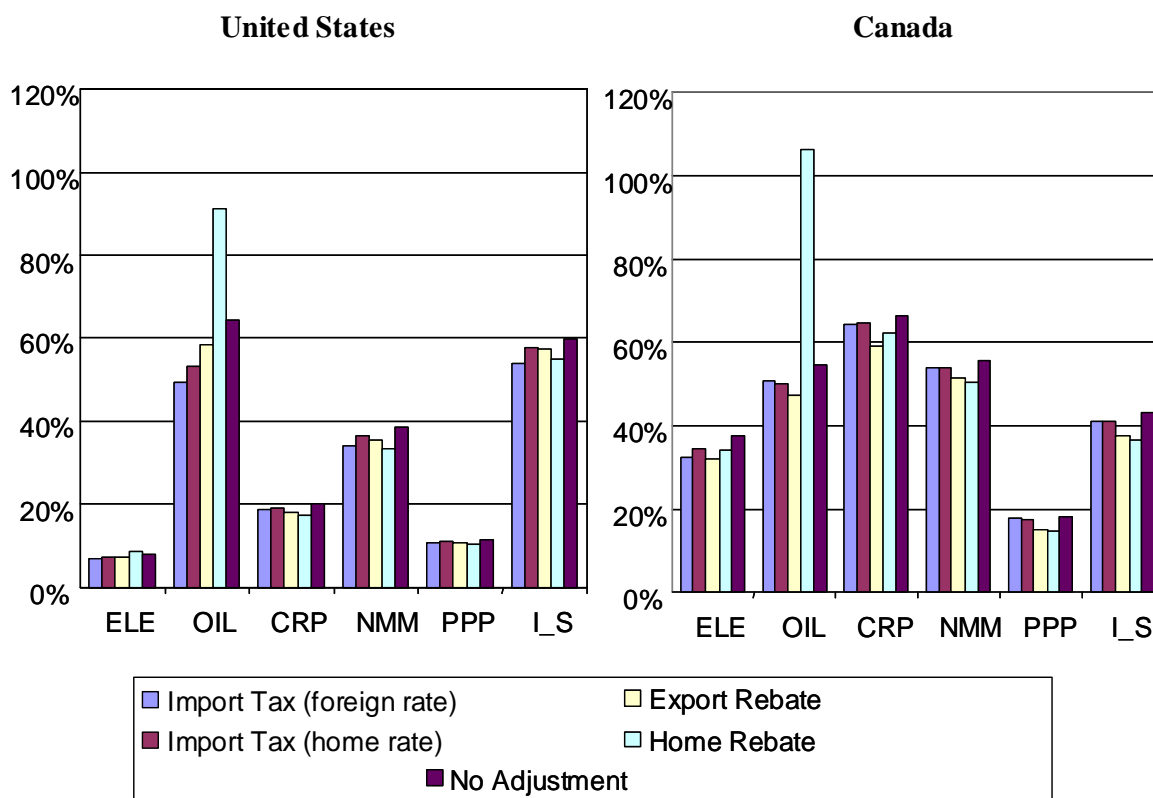
utterly ineffective at improving net reductions and quite counterproductive for electricity and especially refined petroleum products.

Figure 3. Results of Adjustment Policies for Canada



The limitations of these policies are also revealed when looking at average leakage rates (Figure 4). While they decrease the foreign emissions in the numerator, they also decrease the domestic reductions in the denominator. In some cases, (like OIL), the latter effect dominates and average leakage actually increases.

Figure 4. Effects of Adjustment Policies on Average Leakage Rates



Some stakeholders argue for rebates that account for not only emissions allowance costs but also upstream cost changes. If one uses the full cost change under the carbon price as the basis for adjustments and rebates, the policies unsurprisingly have stronger effects, and net reductions double for the steel sector. Still, the net improvements in emissions remain modest as a share of baseline domestic reductions, being limited to the leakage that is attributed to production shifting (last line of Table 3).

Discussion and Caveats

This analysis has several important caveats and areas for future research. First, and perhaps most importantly, our level of aggregation for the sectors—chosen because of the availability of econometrically estimated trade elasticities—is arguably too high. The relative emissions intensities of foreign goods and elasticities may be quite different for more narrowly defined subsectors. Since elasticities of substitution typically rise with greater disaggregation, it is possible that the small numbers for the aggregate leakage that can be avoided mask larger effects for particular energy-intensive and trade-sensitive subsectors. Thus, improving estimates

of these parameters for the specific industries being targeted by climate policies is of great importance for understanding the potential benefits of engaging in border adjustment or rebate policies.

Second, by modeling a carbon tax, this analysis assumes the domestic emissions price remains fixed. With a cap-and-trade system (at home or abroad), any policy that would otherwise raise emissions instead drives up the allowance price; while overall emissions may not rise in the covered sectors, costs will rise, and their distribution across sectors can change. Since all of these policies tend to raise domestic emissions, the extent they do so under a carbon tax is an indicator of the size of distortions they would create in the domestic emissions market.

The analysis also ignores climate policies in other countries, including the E.U. ETS. The impact of this unilateralist assumption depends on the sector and country. For example, in our model, 14 percent of the leakage related to production shifting for the U.S. steel sector goes to Europe, and roughly one-third to Annex I nations (and 17 percent to China).³ For Canada, 72 percent of the displaced emissions go to the United States, while 3 percent go to Europe. Since border adjustments can in theory be designed to distinguish between countries with and without adequate climate policies, while the home rebate cannot, the policies will have different trade-offs as more countries undertake significant and costly GHG reduction policies.

Finally, policy makers and industry stakeholders have a tendency to worry about competitiveness and leakage on a sector-by-sector basis. We have parameterized a model in that same vein, revealing some important trade-offs among the first-order effects of border adjustment and rebate policies. However, sectors do not operate in a vacuum, and any policy targeting one sector will have secondary effects on other sectors that it buys from and sells to, and so on. Ultimately, from an effectiveness standpoint, one cares about total global emissions from all sectors—both covered and uncovered, and at home and abroad. A better understanding of these general equilibrium effects is an area for future research, but we also conduct an initial evaluation here. We simulated the policy of the full border adjustment by using the home emission rates in the full CGE model and compared the results to those of our parameterized partial equilibrium model for the United States. Unsurprisingly, we found important general

³ These leakage shares do differ from simple import shares, since they include export-related effects and differences in emissions rates; for example, Houser et al. (2008, Table 3.1) report that over half of steel imports are from Annex I nations, so this import share metric may understate leakage.

equilibrium effects when ELE and OIL were included in the border adjustment policy. Excluding these sectors, the partial equilibrium model did a good job of representing the effects on the sectors receiving the adjustment, although with a slight tendency to overstate the effects, particularly for I_S. Overall, however, by ignoring effects on other sectors, it understates the equilibrium effect of the border adjustment policy on total emissions at home by half and on foreign emissions reductions by a quarter, the net result being an overstatement of net global reductions that can be achieved by the policy, which were already quite small.

Conclusion

Our analysis indicates that border adjustments for climate policy are not only likely to be contentious and disputed under trade law, but may not even be very effective at improving overall emissions reductions net of foreign leakage. A border tax on imports only affects the relative price of domestic and foreign goods in the home country. Policies that provide export relief, on the other hand, affect the relative price of the home good in the rest of the world and discourage substitution abroad, but not at home. Rebates at home discourage substitution toward foreign goods at home and abroad, but they also discourage conservation at home. All policies do, however, avoid some of the losses in production associated with a carbon tax.

While it seems that full border adjustment would likely be the most effective policy for the United States for avoiding leakage, if this option is not judged to be consistent with trade law or practically feasible, then the home rebate could achieve most of those gains. The exceptions are in the electricity and refined oil products sectors, where the subsidy undoes the incentives to curb domestic consumption and thus expands emissions at home considerably. However, since the home rebate does not discriminate among competing countries, a mechanism may be required for phasing out these domestic benefits as more of the important trading partners take on comparable climate policies.

Finally, we acknowledge some important practical considerations. For import adjustments, any version that attempts to discriminate by country raises thorny issues of how to calculate embodied emissions for foreign products and how to define and enforce reliable rules of origin. For rebates, policymakers do need to be careful not to undo the incentive effects of the emissions price. Any export relief or rebate should be based on sector-wide measures of emissions intensity, rather than actual firm-level emissions, to ensure that the subsidy supports output and not emissions. However, average intensity metrics face the challenge of defining the denominator—the unit of production. The same sector (and even firm) can produce different kinds of products. Defining and implementing these kinds of rebates is akin to setting and

enforcing emissions performance standards by product. Such efforts are certainly being considered, particularly in the context of potential sectoral agreements, but the devil will be in the details.

References

- Aldy, Joseph E. and William A. Pizer. Forthcoming. The U.S. Competitiveness Impacts of Domestic Greenhouse Gas Mitigation Policies. Report for the Pew Center on Global Climate Change.
- Asselt, H. van, and F. Biermann. 2007. European Emissions Trading and the International Competitiveness of Energy-Intensive Industries: A Legal and Political Evaluation of Possible Supporting Measures. *Energy Policy* 35(1): 497–507.
- Babiker, Mustafa H., and Thomas F. Rutherford. 2005. The Economic Effects of Border Measures in Subglobal Climate Agreements. *The Energy Journal* 26(4): 99–126.
- Bagwati, Jagdish, and Mavroidis, Petros C. 2007. Is Action Against U.S. Exports for Failure to Sign Kyoto Protocol WTO-Legal? *World Trade Review* 6: 299–310.
- Biermann, F., and R. Brohm. 2005. Implementing the Kyoto Protocol Without the United States: The Strategic Role of Energy Tax Adjustments at the Border, Global Governance. *Climate Policy* 4: 289–302.
- Brewer, Thomas L. 2008. U.S. Climate Change Policy and International Trade Policy Intersections: Issues Needing Innovation for a Rapidly Expanding Agenda. Paper Prepared for a Seminar of the Center for Business and Public Policy, Georgetown University. February 2008, Washington, DC.
- Burniaux, J.-M., and J. Oliveira Martins. 1999. Carbon Emission Leakage: A General Equilibrium View. ECO/WKP(2000)15, Economics Department Working Papers No. 242. Paris, France: Organisation for Economic Co-operation and Development.
- de Cendra, Javier. 2006. Can Emissions Trading Schemes Be Coupled with Border Tax Adjustments? An Analysis vis-à-vis WTO Law. *Review of European Community and International Environmental Law (RECIEL)* 15(2): 131–145. ISSN 0962 8797.
- Demailly, D., and P. Quirion. 2006. CO₂ Abatement, Competitiveness and Leakage in the European Cement Industry under the E.U. ETS: Grandfathering versus Output-Based Allocation. *Climate Policy* 6(1): 93–113.
- Demailly, D., and P. Quirion. 2008a. European Emission Trading Scheme and Competitiveness: A Case Study on the Iron and Steel Industry. *Energy Economics* 30(4): 2009–2027.

- Demailly, D., and P. Quirion. 2008b. Concilier Compétitivité Industrielle et Politique Climatique: Faut-il Distribuer les Quotas de CO₂ en Fonction de la Production ou Bien les Ajuster aux Frontières? *La Revue Économique* 59(3): May 2008.
- Esty, Daniel C. 1994. *Greening the GATT: Trade, Environment, and the Future*. Washington, DC: Institute of International Economics.
- Fischer, Carolyn. 2001. Rebating Environmental Policy Revenues: Output-Based Allocations and Tradable Performance Standards. Discussion paper 01-22. Washington, DC: Resources for the Future.
- Fischer, Carolyn, and Alan K. Fox. 2007. Output-Based Allocation of Emissions Permits for Mitigating Tax and Trade Interactions. *Land Economics* 83: 575–599.
- Fischer, Carolyn, and Alan K. Fox. 2008. Combining Rebates with Carbon Taxes: Optimal Strategies for Coping with Emissions Leakage and Tax Interactions. Washington, DC: Resources for the Future.
- Fischer, Carolyn, Sandra Hoffmann, and Yutaka Yoshino. 2004. Multilateral Trade Agreements and Market-Based Environmental Policies. In *Critical Issues in Environmental Taxation: International and Comparative Perspectives* (Volume 1), edited by Janet Milne, Kurt Deketelaere, Larry Kreiser, and Hope Ashiabor. Richmond, UK: Richmond Law and Tax Ltd., 363–384.
- Gielen, Dolf, and Yuichi Moriguchi. 2002. CO₂ in the Iron and Steel Industry: An Analysis of Japanese Emission Reduction Potentials. *Energy Policy* 30: 849–863.
- Godard, Olivier. 2007. Unilateral European Post-Kyoto Climate Policy and Economic Adjustment at E.U. Borders. EDF—Ecole Polytechnique: Cahier No. DDX 07-15.
- Green, Andrew. 2006. Trade Rules and Climate Change Subsidies. *World Trade Review* 5(3): 377–414.
- Grubb, M., and K. Neuhoff. 2006. Allocation and Competitiveness in the E.U. Emissions Trading Scheme: Policy Overview. *Climate Policy* 6(1): 7–30.
- Hepburn, C., Neuhoff, K., Grubb, M., Matthes, F. and Tse, M. 2006. Auctioning of EU ETS Phase II allowances: why and how? *Climate Policy* 6(1): 137-160.
- Ho, Mun, Richard D. Morgenstern, Jhih-Shyang Shih. 2008. Impact of Carbon Price Policies on U.S. Industry. RFF Discussion Paper 08-37. Washington, DC: Resources for the Future.

- Hoerner, J., and F. Muller. 1997. Carbon Taxes for Climate Protection in a Competitive World. In *Ökologisch orientierte Steuerreformen: Die fiskal- und aussenwirtschaftspolitischen Aspekte*, edited by E. Staehelin-Witt and H. Blöchliger. Published for Swiss Federal Office for International Economic Affairs. Bern, Switzerland: Verlag Paul Haupt.
- Houser, Trevor, Rob Bradley, Britt Childs, Jacob Werksman, and Robert Heilmayr. 2008. *Leveling the Carbon Playing Field: International Competition and U.S. Climate Policy Design*. Washington, DC: Peterson Institute for International Economics and World Resources Institute.
- International Centre for Trade and Sustainable Development (ICTSD). 2008. Climate Change: Schwab Opposes Potential Trade Measures. *Bridges Trade BioRes* 8(4): March 7.
- Ismer R., and K. Neuhoff. 2004. Border Tax Adjustments: A Feasible Way to Address Nonparticipation in Emission Trading. CMI Working paper No. 36. Cambridge, UK: University of Cambridge.
- Karp, Larry S., and Jinhua Zhao. 2008. A Proposal for the Design of the Successor to the Kyoto Protocol. Discussion paper 2008-03. Cambridge, MA: Harvard Project on International Climate Agreements. September.
- Kommerskollegium. 2004. Climate and Trade Rules: Harmony or Conflict? Stockholm, Sweden: National Board of Trade.
- Morris, Michael G., and Edwin D. Hill. 2007. Trade Is the Key to Climate Change. *The Energy Daily* 35(33): February 20.
- Neuhoff, Karsten, and Susanna Droege. 2007. International Strategies to Address Competitiveness Concerns. Electricity Policy Research Group Working paper No. 6. Cambridge, UK: University of Cambridge.
- Pauwelyn, Joost. 2007. U.S. Federal Climate Policy and Competitiveness Concerns: The Limits and Options of International Trade Law. Nicholas Institute for Environmental Policy Solutions. Working paper 07-02. Durham, NC: Duke University.
- Peters, Glen P., and Edgar G. Hertwich. Forthcoming. *Environmental Science and Technology*.
- Peterson, Everett B., and Joachim Schleich. 2007. Economic and Environmental Effects of Border Tax Adjustments. Working paper Sustainability and Innovation No. S1/2007. Karlsruhe, Germany: Fraunhofer Institute Systems and Innovation Research.

- Ponssard, Jean Pierre, and Neil Walker. 2008. E.U. Emissions Trading and the Cement Sector: A Spatial Competition Analysis. Manuscript. Paris, France: Laboratoire d'Économétrie, CNRS et École Polytechnique.
- Reinaud, Julia. 2005. Industrial Competitiveness under the European Union Emissions Trading Scheme. IEA Information Paper. Paris, France: International Energy Agency/Organisation for Economic Co-operation and Development.
http://www.iea.org/textbase/papers/2005/Industrial_Competitiveness.pdf (accessed 9/21/08).
- Reinaud, Julia. 2008. Issues Behind Competitiveness and Carbon Leakage: Focus on Heavy Industry. IEA Information Paper. Paris, France: International Energy Agency/Organisation for Economic Co-operation and Development.
- Sampson, Gary. 1998. WTO Rules and Climate Change: The Need for Policy Coherence. In *Global Climate Governance: Inter-linkages between the Kyoto Protocol and Other Multilateral Regimes*. Tokyo, Japan: Global Environment Information Centre.
- Stiglitz, Joseph E. 2006. A New Agenda for Global Warming. *The Economists' Voice* 3(7): article three. Berkeley Electronic Press.
- Zhang, ZhongXiang, and Lucas Assunção. 2001. Domestic Climate Policies and the WTO. FEEM Working paper 91.2001. Milan, Italy: Fondazione Eni Enrico Mattei.

Appendix

Table 6. Simulated Elasticities for the United States

Sector	η_{hH}	η_{mH}	η_{xX}	η_{fX}	η_{mM}	η_{hM}
Electricity	(0.56)	2.29	(4.34)	0.00	(2.76)	0.02
Petroleum and coal products (refined)	(0.86)	1.27	(3.30)	0.04	(1.84)	0.17
Chemical industry		2.34	(4.58)	0.29	(2.51)	0.46
Nonmetallic minerals	(0.60)	2.36	(4.22)	0.10	(2.27)	0.46
Paper, pulp, and print	(0.59)	2.86	(4.07)	0.13	(2.62)	0.20
Iron and steel industry	(0.51)	2.79	(4.49)	0.06	(2.50)	0.35

Table 7. Simulated Elasticities for Canada

Sector	η_{hH}	η_{mH}	η_{xX}	η_{fX}	η_{mM}	η_{hM}
Electricity	(0.71)	2.17	(3.62)	0.00	(2.73)	0.06
Petroleum and coal products (refined)	(1.07)	1.28	(3.71)	0.01	(1.88)	0.15
Chemical industry	(3.16)	0.37	(5.48)	0.05	(1.34)	1.32
Nonmetallic minerals	(1.58)	1.43	(5.01)	0.02	(1.54)	1.20
Paper, pulp, and print	(1.46)	1.67	(3.95)	0.08	(2.16)	0.64
Iron and steel industry	(1.45)	1.93	(5.08)	0.03	(1.97)	0.78