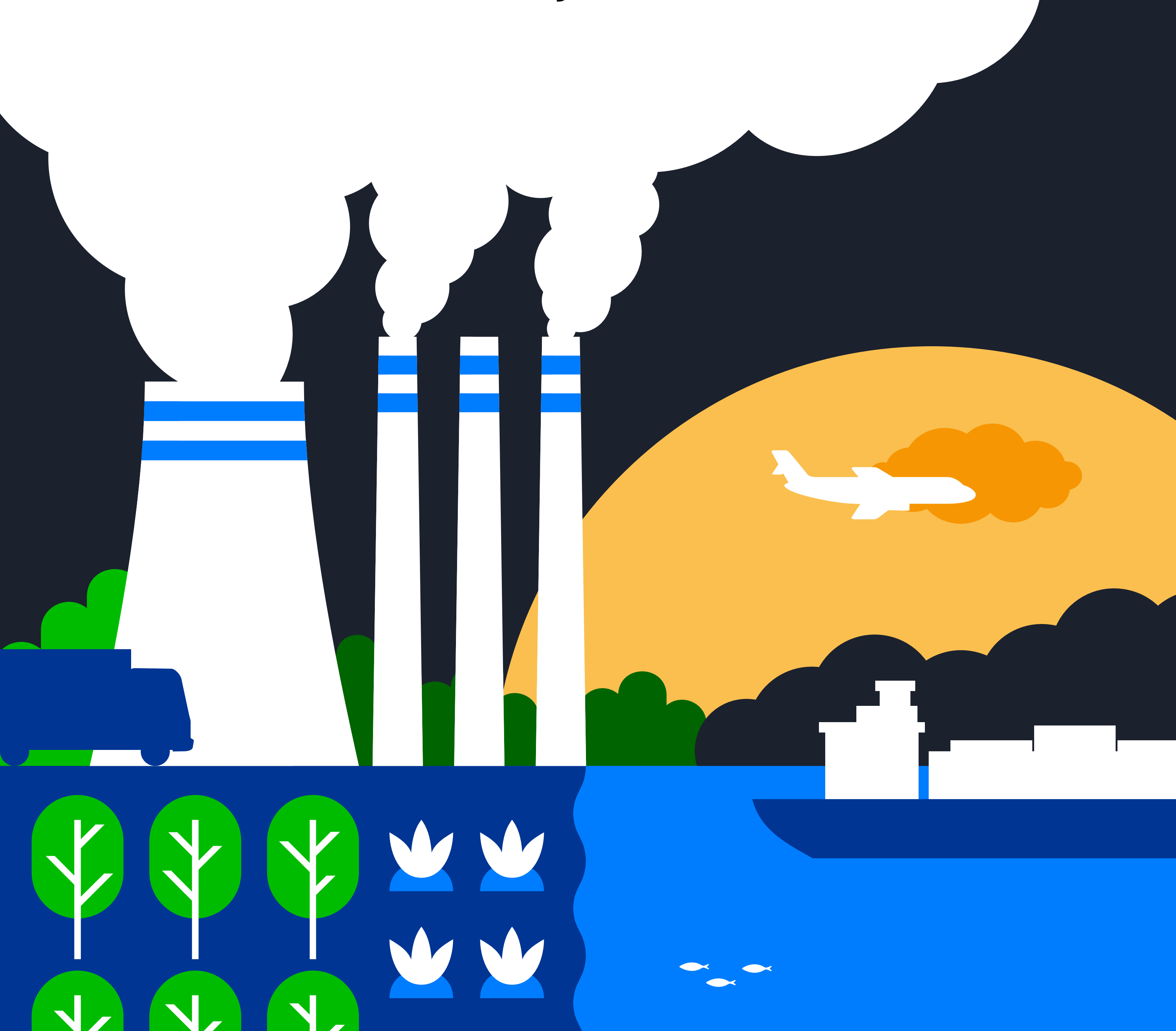
Global Principles for Effective Border Carbon Adjustments



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Introduction

The UN Framework Convention on Climate Change (UNFCCC) and the Paris Climate Agreement are the foundation for a sustainable, net-zero emissions future. They underscore the importance of international cooperation and coordinated solutions at all levels, driving the highest possible ambition and effective action.

The COP28 UN Climate Change Conference further demonstrated the potential of multilateralism and reinforced that cooperation is our only option to tackle the global climate crisis and put into action the negotiated outcomes, the so-called "UAE Consensus". In this effort, the global business community not only has a pivotal role to play but also carries a clear responsibility to help put the world back on the 1.5-degree pathway. Business stands resolutely behind the goals of the Paris Agreement and achieving net zero emissions by 2050.

However, the global business community faces roadblocks beyond its control. Coordinated action by all governments is essential to addressing barriers to the deployment of climate solutions and making investments in a net-zero future more attractive by adopting policy frameworks that provide real incentives and support concrete actions, innovations, and investment.

Many countries to the Paris Agreement have adopted ambitious domestic climate policies, including national and regional carbon pricing schemes to achieve their nationally determined contributions. However, there is growing evidence that varying levels of regulation of emission reductions in different countries and the absence of a coordinated global approach to carbon pricing may shift investment, production, and emissions to regions with less stringent policies. From this perspective, 'carbon leakage'[1] could undermine efforts to reduce carbon emissions.

To address carbon leakage, the European Union (EU) became the first in the world to adopt a carbon border adjustment mechanism (CBAM) in 2021, as part of the EU Green Deal and the "Fit for 55" package, complementing the EU Emissions Trading System (EU ETS). The EU CBAM Regulation entered into force on 17 May 2023 and provides for a transitional period from 1 October 2023 to 31 December 2025.[2]

1 Carbon leakage is considered as a result of asymmetrical/fragmented carbon policies, price differences, sector coverage and the resulting carbon cost. See 2023-ICC-proposals-for-effective-carbon-pricing-leakage-and-linkage-considerations.pdf (iccwbo.org), pages 13-14.

2 See European Commission: Carbon Border Adjustment Mechanism - European Commission (europa.eu), (last accessed 05/09/24).

As several major economies move to implement similar border carbon adjustment (BCA) measures, there is a significant risk of these unilateral measures creating trade barriers and a fragmented and distorted landscape for businesses exporting their products internationally. Recent research[3] also indicates that a BCA, such as the EU CBAM, is likely to disproportionately impact developing countries by reducing their trade levels and causing gross domestic product (GDP) losses.

In view of these emerging risks, as well as considering early learnings from the transitional period under the EU CBAM, the International Chamber of Commerce (ICC), building on its ICC Carbon Pricing Principles (2021)[4]; ICC Critical Design Features for Effective Carbon Pricing (2022), and ICC Principles and Proposals for Effective Carbon Pricing (2023)[5], has engaged its business network in 170 countries to identify the main critical elements for the effective design and implementation of BCAs.

ICC fully supports countries' ambitious climate efforts and recognises the challenges posed by carbon leakage. Well-designed BCA measures that are based on globally agreed principles can play a role in addressing these risks and advancing the Paris Agreement goals.

The following principles and recommendations draw on lessons learned to date aim to help governments leverage the opportunities arising from BCAs, and minimise negative impacts on businesses and consumers through a multilateral approach that advances climate goals, fosters fair competition, and promotes international commerce.

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3 African Climate Foundation and LSE Implications for African Countries of a Carbon Border Adjustment Mechanism in the EU - The African Climate Foundation (2024); CSE Carbon Border Adjustment Mechanism (CBAM): The Global South's response to a changing trade regime in the era of climate change (cseindia.org); World Bank Group Relative CBAM Exposure Index (worldbank.org) (2024).

4 See ICC Carbon Principles (2021) 2021-cop26-icc-carbon-pricing-principles.pdf (iccwbo.org)

5 See: Critical design features for effective carbon pricing (2022); ICC Principles and proposals for effective carbon pricing (2023) here 2021-cop26-icc-carbon-pricing-principles.pdf (iccwbo.org); ICC recommendations on the implementation of CBAM (2023) and Open letter on CBAM (2024).

ICC Global Principles for Effective Border Carbon Adjustments

01 **Support** Paris Agreement goals as primary objective

02 **Ensure** WTO compliance

03 **Respect** UNFCCC and Paris Agreement principles

04 **Provide** targeted exemptions and support for most vulnerable countries

05 **Co-create** policies with business and build public-private partnerships

06 **Determine** sector, product and emissions scope based on real leakage risks

07 **Develop** and apply international carbon accounting methodologies

08 **Ensure** interoperability

09 **Recognise** equivalence

10 **Account** for pricing and consider non-pricing efforts

11 **Apply** a reasonable threshold

12 **Allow** the use of neutral default values

13 **Protect** confidential business information

14 **Support** new and small enterprises

15 **Reflect** purpose-directed use of proceeds

16 **Ensure** sufficient transition and reporting periods

17 **Establish** complementary policies

18 **Establish** an international technical body for policy coordination

19 **Lead** agency and inter-agency collaboration

20 **Practice** data frugality

21 **Start** with a pilot process

22 **Ensure** timely and effective communication

I. Compliance with international law and international cooperation

01 **Support** Paris Agreement goals as primary objective

02 **Ensure** WTO compliance

03 **Respect** UNFCCC and Paris Agreement principles

04 **Provide** targeted exemptions and support for most vulnerable countries

01 **Support** Paris Agreement goals as primary objective

BCAs should seek to contribute to the global reduction of carbon emissions by preventing carbon leakage and enhancing domestic climate ambition.[6] These measures should lead to verifiably increased climate mitigation efforts and actions, and the achievement of a country's NDCs under the Paris Agreement.

It is important that BCAs do not hinder global efforts on climate action but instead lead to increased collaboration and coordination. BCAs should be introduced either in conjunction or in alignment with existing national or regional carbon pricing mechanisms. They should also be coherent with other national climate policies, avoiding overlapping measures such as double taxation, while advancing international cooperation on carbon pricing, including under Article 6 of the Paris Agreement.

6 See ICC Carbon Pricing Principles Principle 1.

02 **Ensure** WTO compliance

BCAs must be compatible with international treaties and agreements, most notably with World Trade Organization (WTO) rules. A key pillar of the multilateral trading system is the principle of non-discrimination. For trade in goods, two elements are particularly relevant: the most-favoured-nation (MFN) treatment obligation set out in Article I of the General Agreement on Tariffs and Trade (GATT) 1994 and the national treatment (NT) obligation set out in Article III of the GATT 1994.

BCAs should not cause discrimination between domestic products subject to a domestic carbon pricing scheme and imported products. They should also not discriminate among imports from different countries or become a form of disguised trade protectionism. Their legitimate aim must be to address real leakage risks and ensure a level playing field for companies globally.

Extensive and timely bilateral and multilateral diplomatic engagement with key trade partners and other WTO Members in an open, transparent and inclusive manner, and prior to the crafting and implementation of BCA measures is essential to form a shared understanding of the fundamental aspects of the BCA and avoid escalatory retaliation that could lead to economically harmful trade wars. It is critical that WTO Members discuss the trade-related aspects of BCAs and consider methods to develop a multilateral approach that meets climate goals without violating trade rules. Business engagement on technical design issues is critical to ensure that the measures can be successfully implemented.

03 **Respect** UNFCCC and Paris Agreement principles

Countries designing and implementing a BCA must recognise the varying capabilities of developing and emerging economies to mitigate greenhouse gas (GHG) emissions. BCAs must be in line with UNFCCC and Paris Agreement principles of equity and common but differentiated responsibilities and respective capabilities (CBDR-RC) as well as the WTO's special and differential treatment (SDT) principle.

Article 3.5 of the UNFCCC also provides that "measures taken to combat climate change, including unilateral ones, should not constitute means of arbitrary or unjustifiable discrimination or a disguised restriction on international trade". This principle echoes the GATT 1994, which was reaffirmed in the COP28 Global Stocktake outcome, and remains paramount in safeguarding the multilateral trading system while advancing climate policy. It is critical that a BCA respects the nationally determined nature[7] and the principle of cooperation between countries that are at the core of the Paris Agreement and are expressed across different articles, such as Article 4 on NDCs, Article 6 on cooperative market and non-market approaches, and Article 9 on financial support.

7 Article 4.2 and 4.3 of the Paris Agreement respectively state that it is up to each party to prepare, communicate and maintain successive NDCs that it intends to achieve and that successive contributions should reflect each party's 'common but differentiated responsibilities and respective capabilities, in the light of different national circumstances'.

04 **Provide** targeted exemptions and support for most vulnerable countries

In line with the principles of the Paris Agreement and the UNFCCC, it is key to recognise countries' different starting points, particularly the special circumstances of least developed countries (LDCs) and small island developing states (SIDS), to ensure we can deliver on our collective commitments in a just and inclusive manner. The climate action agenda must be integrated into development plans to allow countries to tackle the climate crisis without stifling development and industrialisation, creating opportunities for sustainable growth for all.

Thus, LDCs and SIDS should be exempted from BCA obligations through an LDC waiver or, alternatively, an equivalent measure to the Duty-Free Quota-Free scheme. Targeted additional support, such as capacity building and technical assistance should help vulnerable countries and their businesses decarbonise and adhere to the CBDR-RC principle, while at the same time reducing and minimising negative impacts of a BCA on development. However, such measures may raise legal and circumvention risks. Therefore, it is important to engage with concerned countries to jointly agree on the definition and application of exemptions or preferential treatments.

Countries should also undertake an *ex-ante* independent risk assessment of the effects of their proposed BCA on their principal trade partners and, in particular, on developing and emerging economies' exports and competitiveness in relation to the objective to reduce GHG emissions.

II. Practical design principles

05 **Co-create** policies with business and build public-private partnerships

06 **Determine** sector, product and emissions scope based on real leakage risks

07 **Develop** and apply international carbon accounting methodologies

08 **Ensure** interoperability

09 **Recognise** equivalence

10 **Account** for pricing and consider non-pricing efforts

11 **Apply** a reasonable threshold

12 **Allow** the use of neutral default values

13 **Protect** confidential business information

14 **Support** new and small enterprises

15 **Reflect** purpose-directed use of proceeds

16 **Ensure** sufficient transition and reporting periods

17 **Establish** complementary policies

18 **Establish** an international technical body for policy coordination

05 **Co-create** policies with business and build public-private partnerships

Enabling co-creation of policies and a higher level of cooperation between public authorities and business is critical to ensure BCAs are designed in a way that they can be effectively implemented and to minimise complexity, administrative and compliance costs for businesses. Continued consultation and dialogue with the private sector and other stakeholders is therefore essential when designing, implementing and strengthening BCA policy frameworks.

06 **Determine** sector, product and emissions scope based on real leakage risks

The primary objectives and rationale for a BCA should be to address carbon leakage risks and encourage higher climate ambition globally. While evidence on the magnitude of leakage is still mixed, studies suggest that emission-intensive sectors and/or products that are heavily exposed to international trade[8] may face leakage risks. From this perspective, BCAs should target only major emission-intensive sectors and products most at risk of carbon leakage due to their GHG emissions intensity and trade exposure.

Additionally, to set an effective scope and ensure that BCAs remain effective in addressing significant carbon leakage risks, governments should:

a. Conduct robust and independent *ex ante* assessments to identify high-risk industries to target the appropriate sectors and products. These assessments should also evaluate the feasibility of implementation and the overall effectiveness of a BCA. Continuous reviews, stakeholder consultations, and cost-benefit analyses will also be essential.

b. Focus BCAs on direct emissions from production processes of goods within the scope of the BCA. In addition, and in particular for energy intensive sectors, governments should consider whether BCAs should also capture indirect emissions, i.e. those related to the production of purchased electricity consumed during production of the product in question.

c. Identify suitable and effective approaches to address the complexities and specific circumstances of certain sectors. Similarly, the inclusion of major emission-intensive value chains in the BCA scope should be considered carefully and included only if negative effects on downstream sectors and products are negligible.

d. Carefully consider the inclusion of both simple and complex goods as well as certain categories of products (e.g., second-hand goods), which may require special treatment (including exemptions).

e. Align BCAs scopes with existing regional, national, and local carbon pricing mechanisms to effectively address leakage risks.

f. Maintain technology neutrality by applying BCAs consistently across emission-intensive industries based on emission intensity, regardless of production methods.

Ultimately, a coordinated approach among countries developing and implementing BCAs on these core aspects is vital to avoid creating major complexities for companies operating globally.

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8 See ICC Proposal For Effective Carbon Pricing: Leakage and Linking Considerations, page 13-14 2023-ICC-proposals-for-effective-carbon-pricing-leakage-and-linkage-considerations.pdf (iccwbo.org)

07 **Develop** and apply international carbon accounting methodologies

As more governments move to implement BCAs, there is a real risk that each may establish a different methodology for emission measurement, reporting, and verification (MRV). This could create significant additional administrative burdens on exporters that increase the cost of trade and may amount to non-tariff barriers. Thus, international cooperation in developing and adopting globally recognised standards for GHG emission measurement and reporting will be crucial, either by creating new international standards where none exist or by developing equivalence protocols that recognise methodologies used under different standards as equivalent.

Such effort should build on existing standards, such as the GHG Protocol, ISO 14064 and national MRV systems, and should be conducted within, or at least with the close support of, international or regional standard-setting organisations. Governments should also take into account ongoing international and regional initiatives, such as carbon clubs and sector-specific efforts, and work towards the maximum harmonisation of MRV requirements and methodologies. At the same time, they must consider sector-specific complexities and circumstances. As a temporary measure, it is recommended to accept existing accounting standards, with third-party assurance confirming compliance with required methodologies.

An effective GHG emissions accounting methodology should also ensure equal treatment of a wide range of activities and technologies that reduce or remove emissions.

08 **Ensure** interoperability

Interoperability between BCA systems is essential to streamline accounting and reporting processes for companies operating across multiple jurisdictions and minimise duplicative efforts. Focusing on these elements ahead of implementation would assuage concerns with the administrative feasibility given the lack of global data on embedded emissions associated with energy-intensive manufacturing.

09 **Recognise** equivalence

In this context, we recommend the creation of a system of equivalence for GHG accounting and reporting methodologies (until a globally recognised methodology is developed) as well as for domestic carbon pricing instruments. This system should involve independent, trusted third parties to serve as clearing houses and provide the necessary verification of the carbon pricing system in the originating country.

Such a system would significantly decrease the administrative burden on exporters and importers. Existing efforts, such as the World Bank's State and Trends of Carbon Pricing and Carbon Pricing Dashboard, the OECD's Inclusive Forum on Carbon Mitigation Approaches, and the International Carbon Action Partnership work on cap-and-trade systems, can serve as an important base in this regard.

10 **Account** for pricing and consider non-pricing efforts

In line with the principles of the Paris Agreement, countries should determine the most effective, politically and economically feasible policies to achieve their climate targets when developing their NDCs, with a focus on market-based instruments. Countries use various pricing schemes, including implicit taxation mechanisms that effectively place a price on carbon. BCAs countries should consider recognising these different carbon costs paid, including through Article 6 of the Paris Agreement emissions reduction credits, like Internationally Transferred Mitigation Outcomes, in addition to national carbon pricing. This is particularly relevant for businesses operating in countries with no domestic pricing scheme or very low carbon prices.

For those countries that, for economic or other reasons, cannot introduce an explicit carbon price, other policy alternatives should be considered to tackle climate change, such as preserving and expanding critical ecosystems, forests, soils, marine ecosystems as carbon sinks should be considered as equivalent to pricing efforts until such time when they are in a position to do so.

The future international technical body for policy coordination on BCAs (proposed further below) should be mandated to develop an effective and implementable solution in this regard. Some of the fundamental questions to address these issues include:

- Which policies should be recognised as climate policies, and what criteria should be used to determine this?
- How can (price) equivalence among different systems be established?
- Is there a workable mechanism to prevent businesses in countries with implicit pricing systems from facing double charges under a BCA?
- How should voluntary carbon credits from ETS systems that allow a percentage of voluntary credits be treated?
- How can Article 6 Emission Reduction Credits, Article 6.2 Internationally Transferred Mitigation Outcomes and Article 6.4 Emission Reductions be accounted for; in particular for countries that do not have the capacities to establish a domestic pricing scheme?

11 **Apply** a reasonable threshold

A BCA should be designed to ensure maximum cost-effectiveness and consider the competitive impact on affected businesses, especially those with limited resources and capacities. A minimum threshold for BCA products and commodities should be set to exempt smaller and new businesses that fall below a certain export volume and irregular low value/weight consignments, including samples, from BCA reporting requirements. The climate impact of such low-weight or low-value shipments is negligible compared to the bureaucratic burden and the resulting impacts on international transactions.

De minimis limits should be based on the *annual* (and not per consignment) import quantity per importer, calculated in weight or kilowatt hours.

12 **Allow** use of neutral default values

BCAs' reporting obligations can lead to highly complex and burdensome data collection. Inaccuracies in emissions data can lead to miscalculated carbon cost. While BCAs should predominantly require and encourage the use of actual emissions data in calculations (as in the case of the EU CBAM), ICC recommends establishing a fair process for cases where importers have made genuine efforts but are unable to obtain accurate data, in particular, from complex global supply chains. One solution could be allowing importers to use neutral, i.e. non-punitive, default values in certain instances, as an inherent element of a BCA.

It is also important that default calculation methods are consistent across BCA countries, with values communicated transparently and regularly updated to reflect evolving production and emission trends in the relevant sectors. In the short term, this can be achieved through close collaboration among designated government bodies and agencies. In the medium term, a global coordinating body, as discussed below, could play a key role here.

13 **Protect** confidential business information

Under the EU CBAM, collecting data across different tiers of the supply chain presents significant challenges. Many suppliers outside the EU are reluctant to provide business confidential information (BCI) and may even risk violating domestic trade secret protection laws. It is critical to ensure that robust systems are in place to protect BCI as well as relevant international agreements on secure data exchange.

14 **Support** new and small enterprises

Special considerations should be provided for new businesses and micro-, small- and medium-sized enterprises (MSMEs) as they are disproportionately impacted by the high administrative and compliance costs linked to BCA reporting. Due to limited resources, importing MSMEs may have to use the punitive default values for calculating embedded emissions or stop importing directly altogether, opting instead to purchase needed inputs from specialised importers, which will increase their costs.

To address these challenges, MSMEs importing below a certain threshold of total annual value of BCA goods should be exempted from the BCA reporting obligation, at least for a temporary period. Alternatively, a phased approach could help these small businesses navigate reporting and compliance requirements. This approach should include allowing them to use non-punitive default values until they are able to comply with the requirements.

MSMEs in exporting countries have limited resources and capacities to comply with BCA regulations and risk being excluded from global supply chains. It is crucial to provide sufficient capacity building, technical assistance, and financial support to MSMEs in BCA importing and exporting countries to facilitate their compliance with BCAs. It is also important for corporations to collaborate with their suppliers to ensure a balanced approach to managing costs and risks of compliance.

15 **Reflect** purpose-directed use of proceeds

A BCA should include clear provisions on the use of the proceeds. A significant portion of the revenue should be used for the purpose of climate efforts, especially in developing countries and, in particular, for climate adaptation[9]. The share of proceeds could also be allocated to support LDCs and SIDS and their exporting industries to comply with the BCA regime, including through a dedicated fund, as well as to support cooperative approaches under Article 6 of the Paris Agreement. A sufficient part of the revenues arising from BCAs should also be allocated to national competent authorities in order for them to effectively implement the BCA.

16 **Ensure** sufficient transition and reporting periods

Meaningful and timely engagement, consultations and full transparency of the BCA regime's implementation and operation with foreign governments, trading partners and businesses are imperative to reduce administrative complexity on businesses. Effective stakeholder

9 Principle 8 of ICC Carbon Pricing Principles from 2019 emphasises the need to couple carbon pricing with climate mitigation and adaptation efforts. Revenue use from carbon pricing should be set up in a way that drives further action on climate mitigation and adaptation and supports the energy transitions. See 2021-cop26-icc-carbon-pricing-principles.pdf (iccwbo.org)

engagement through technical trainings and briefings, workable transition and reporting periods, and timely distribution of guidance documents are key to giving companies the necessary time and tools to understand BCA requirements, establish efficient processes for compliance, and avoid incorrect reports and penalties. Creating a self-assessment tool can help companies determine the extent to which they are subject to BCA obligations.

17 **Establish** complementary policies

A BCA must be designed and implemented as part of a framework of cross-agency regulations and initiatives. Flanking policies will be needed to support its strengths and bridge gaps that cannot be addressed or are better addressed through measures outside the BCA itself. For example, feasible solutions are needed to ensure the competitiveness of exports from a BCA country and address risks related to circumvention and resource reshuffling, such as the deviation of emission-intense products to other markets while exporting only low-emission products to the BCA country. Additionally, facilitating green investments will be crucial to offset the added costs on capital-intensive projects needed for the green transition stemming from the BCA. As a BCA aims to level the playing field by imposing carbon costs on imported goods, it inevitably increases the overall project costs, particularly in sectors heavily reliant on carbon-intensive materials such as steel, cement, and aluminium.

18 **Establish** an international technical body for policy coordination

The risk of carbon leakage is most effectively addressed through multilateral global cooperation rather than unilateral approaches. We recommend establishing an international technical body that could be anchored within the WTO or UNFCCC. The body should coordinate the development and implementation of different national systems, with a view to ensuring maximum interoperability and alignment and should engage with all relevant stakeholders, including business.

Without such international coordination and cooperation, there is a risk of trade distortions and inconsistencies that could negatively impact international trade relationships.

III. Effective operationalisation principles

19 **Lead** agency and inter-agency collaboration	20 **Practice** data frugality
21 **Start** with a pilot process	22 **Ensure** timely and effective communication

19 **Lead** agency and inter-agency collaboration

While one agency should be appointed as lead agency, a strong mechanism for collaboration between the environmental and customs authorities, national competent authorities and the private sector will be important to ensure cohesive and accurate data reporting and data control, and to effectively support in-country implementation of BCAs. These agencies should be sufficiently staffed with experts from relevant fields of environment, climate, customs, trade and taxation.

20 **Practice** data frugality

Reporting forms should be simple and focus on essential data fields. An immediate and automatic application of default values should be possible if the necessary data cannot be provided. Also, exempted goods should be easily filtered out. Pre-completed forms with already available customs data for imported BCA goods would also facilitate the process. Countries should leverage existing data and only request elements strictly needed for a BCA. Businesses and authorities would then only have to check, correct and complete any missing information.

21 **Start** with a pilot process

There should be sufficient time and support, such as timely guidance documents, trainings and information materials, for companies to prepare and implement internal processes and liaise with suppliers to comply with a BCA. A hasty implementation without adequate awareness and support for companies creates unnecessarily high administrative burdens and costs for companies. A pilot phase as part of a collaborative approach with the private sector in co-creating effective policies and measures can help test the reporting tools, for example a reporting platform, to avoid technical complications and ensure the BCA can be operationalised smoothly and successfully. Pilots also provide the opportunity to finetune any processes and tools to ensure they are working correctly and effectively in practice.

22 **Ensure** timely and effective communication

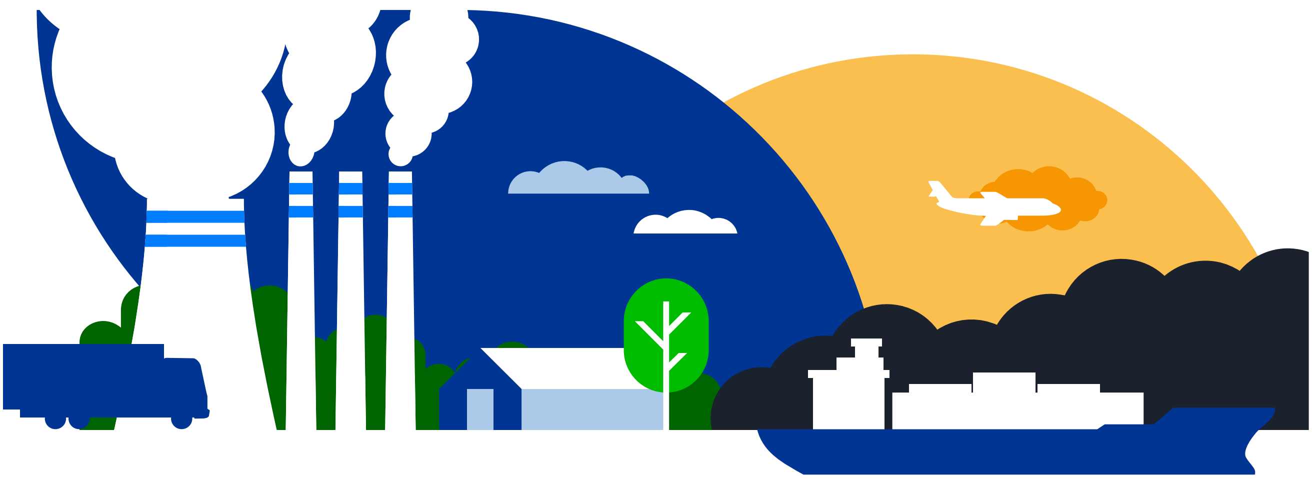
The significant need for engagement, communication and training to prepare all stakeholders, including foreign governments and businesses for the implementation of the BCA should not be underestimated and needs to be taken into account in the design of the timeline for the BCA. The capacity building to raise awareness of the BCA and its implementation, for example on calculation methodologies, should not be limited to stakeholders within the BCA country but also target third countries, namely trading partners, who will be critical in providing reporting data. A dedicated website containing a full set of documents, including regulations, guidance, templates, and other materials in both English and relevant national language(s) of trading partners is also necessary.

Call for action

In conclusion, and in view of the urgency of the issues at stake and the opportunity to enhance the cooperation and inclusiveness of BCAs, **ICC calls on Parties to the UNFCCC and Paris Agreement and WTO Members to initiate joint Trade and Environment Minister discussions** to reach a common understanding on key principles for the design of effective BCAs, building on ICC recommendations, and give the mandate to establish an international technical body for policy coordination.

Recognising that these ministerial discussions may take time, ICC strongly recommends that governments quickly launch a preparatory global dialogue under the aegis of the G20 and with the engagement of the WTO and UNFCCC to start an open exchange of views on opportunities and challenges for BCAs and build mutual understanding on what an effective BCA means.

The involvement of and input from the private sector will be essential in all such efforts. ICC, as the principal business voice to the UNFCCC, WTO and G20, stands ready to engage.



About the International Chamber of Commerce

The International Chamber of Commerce (ICC) is the institutional representative of more than 45 million companies in over 170 countries. ICC's core mission is to make business work for everyone, every day, everywhere. Through a unique mix of advocacy, solutions and standard setting, we promote international trade, responsible business conduct and a global approach to regulation, in addition to providing market-leading dispute resolution services. Our members include many of the world's leading companies, MSMEs, business associations and local chambers of commerce.

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