

## Implementation challenges of the

## Carbon Border Adjustment Mechanism (CBAM)

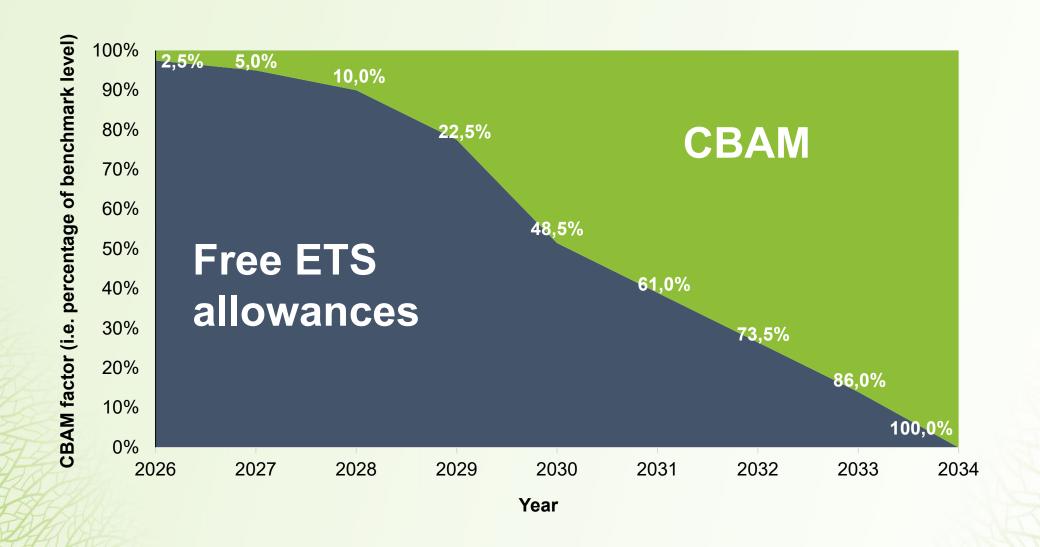
15th EU ETS Comliance Conference

Brussels, 27 November 2024

DG TAXUD.C2



#### CBAM rationale: phasing-out of free allocation under EU ETS

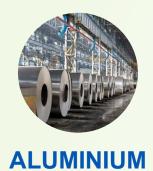




### What are the sectors in scope?













Selected on the basis of 3 criteria:

- ✓ High risk of carbon leakage (high carbon emissions; high level of trade)
- ✓ Covering large share of greenhouse gas emissions of EU ETS sectors
- ✓ Practical feasibility
- Exclusions (under 150 € / countries linked with the EU ETS)
- In the future, scope may be extended to a limited list of ETS sectors at risk of carbon leakage (such as refineries and chemicals), provided that such an extension is justified based on selected criteria

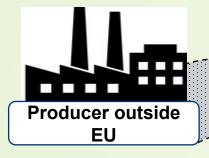


### **Gradual implementation of CBAM**





### Practical implementation during transitional period



#### **Customs**

- Checks authorisation of declarants
- Transmits information to the Commission

## Oak Or

**EU Border** 

#### **Authorised CBAM declarant**

- Declares quarterly/yearly emissions embedded in imports
- 2026: obtains 'authorised CBAM declarant' status
- 2026: Verification of actual values
- 2026: Deduction of carbon price and carbon price paid abroad
- 2026: Surrenders CBAM certificates



on + Surrender

#### Commission

- Coordination with customs and national authorities
- Maintains CBAM Registry
- Review of CBAM declarations
- Anti-circumvention practices
- 2026: CBAM price publication



#### **MS National Authorities**

- Dialogue with importers
- Review of CBAM reports/declarations
- Penalties and appeals
- 2025: Authorise CBAM declarants
- 2026: sell CBAM certificates
- 2026: accredit verifiers



#### Guidance and support by the Commission



- E-learning (General and sector-specific)
- Webinars (General and sector-specific)

#### **Tailored guidance documents for:**

- Producers in third countries
- Reporting declarants

**Excel-based template** to facilitate data collection and information exchange

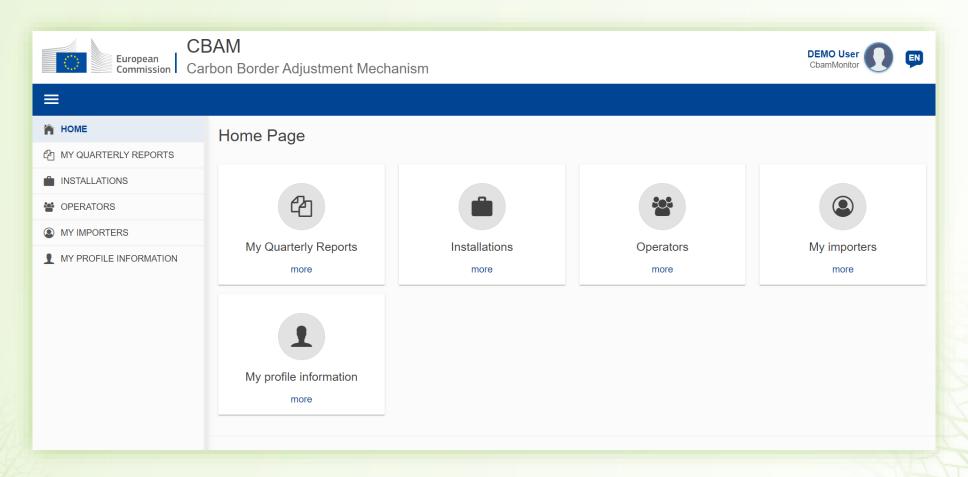
- The CBAM Transitional Registry
- User manual for Declarants

Commission webpage with all CBAM-related information



## Design of the CBAM Transitional Registry

#### https://cbam.ec.europa.eu/declarant





## Review of quarterly CBAM reports

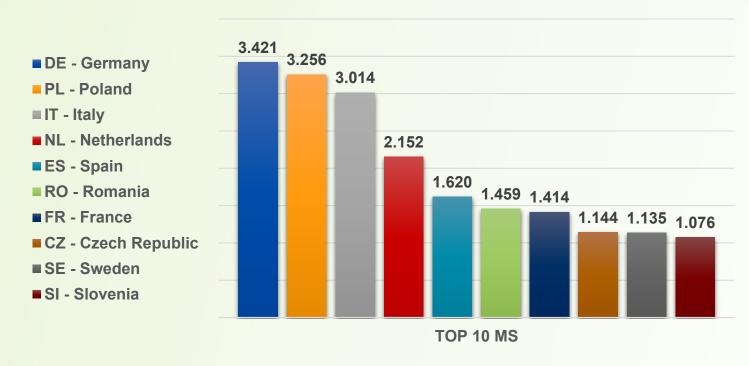
REPORTING PERIOD	SUBMISSION DUE BY	MODIFICATION POSSIBLE UNTIL*
2023: October – December	<b>2024:</b> January 31	<b>2024:</b> July 31
2024: January – March	<b>2024:</b> April 30	<b>2024</b> : July 31
<b>2024:</b> April – June	<b>2024:</b> July 31	<b>2024:</b> August 30
2024: July – September	<b>2024:</b> October 31	<b>2024:</b> November 30
2024: October – December	<b>2025:</b> January 31	<b>2025</b> : February 28
2025: January – March	<b>2025:</b> April 30	<b>2025</b> : May 31
<b>2025:</b> April – June	<b>2025:</b> July 31	<b>2025</b> : August 31
2025: July – September	<b>2025:</b> October 31	<b>2025:</b> November 30
2025: October – December	<b>2026:</b> January 31	<b>2026:</b> February 28

\*After the modification deadline, reporting declarants may request reopening of the file before the national competent authority for eventual corrections.



#### Where do most CBAM declarants come from?

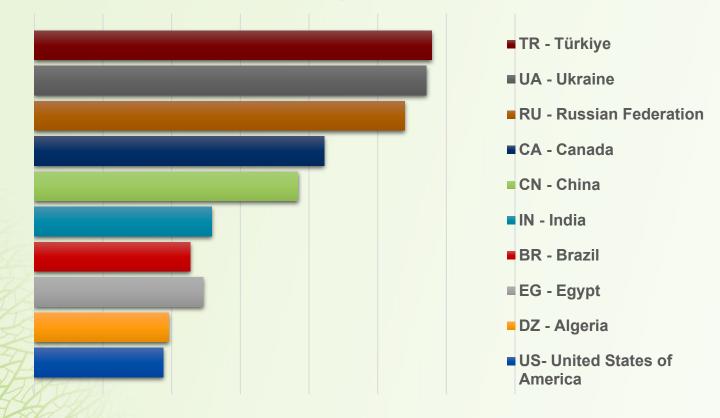
# TOP 10 MS in number of declarants who submitted CBAM reports – status as of 31 October 2024





### Where did the most CBAM goods come from?

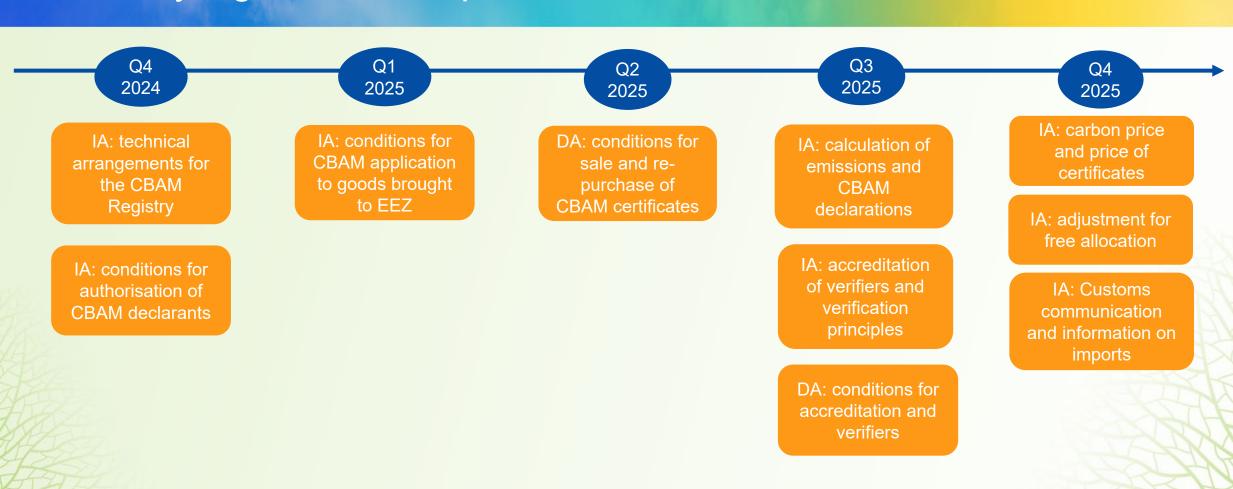
## TOP 10 Countries of Origin in tons of imported goods



- 4 main industrial CBAM sectors are represented: Iron & Steel, Fertilizers, Cement, Aluminium
- In terms of number of imports,
  China is the number #1 Country of Origin

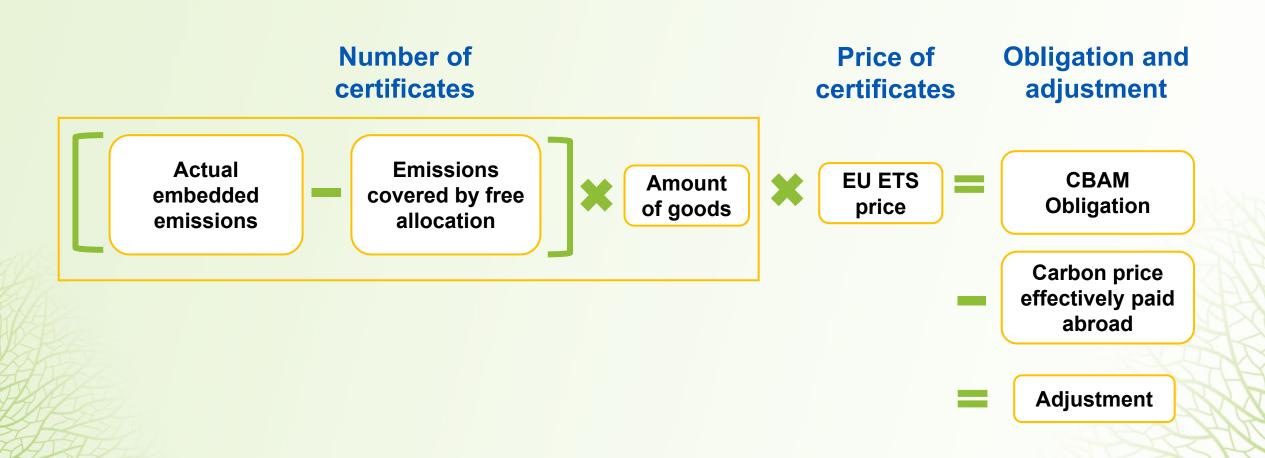


## Secondary legislation to implement CBAM





### Calculation of the CBAM adjustment





#### CBAM accreditation and verification

Member States' national

accreditation bodies





Member States' National Acceditation Body



Accreditation and surveillance of verifiers

#### Verifier



Visits operator's installation and issues one verification report per installation



Third country operator

Sells CBAM goods to various importers.

Transmits calculation of emissions and verification report.

#### National Competent Authority



Review of CBAM declaration and verification report. NCAs may impose penalties on declarants

Commission



Submit CBAM declaration containing verification report of each installation

#### **CBAM** declarants



**CBAM Registry** 





## CBAM simplification package in 2025?

**Lessons learnt** from the transitional period create opportunities for simplifying and reducing the administrative burden. For example:

- Simplification for occasional importers of small quantities of CBAM goods.
- Review the requirement to purchase CBAM certificates corresponding to 80% of emissions (based on default values) from 2026.

- ...



### The Carbon Border Adjustment Mechanism

## Thank you for your attention!

If you have any questions, please contact us:

TAXUD-CBAM@ec.europa.eu