

CBAM & Importing June 2026

CMG

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Welcome!

- Get comfortable
- Phone on silent
- Cameras on where possible
- Value your input/Questions
- Turn on your mic to ask questions/raise hand/put in chat
- Polls/Breakout Rooms/Case Studies

- Break @ 11
- Lunch @ 1-2 (or less!)
- Finish @ 3.30 --



Common Acronyms

- **CBAM** = Carbon Border Adjustment Mechanism
- **AMM** = Authorisation Management Module
- **EU ETS** = EU Emissions Trading System – Certs/Sets CBAM Certificate Price
- **MRV** = Monitor, Report, Verify

- **BF-BOF** = Blast Furnace emissions
- **EAF** = Electric Arc Furnace emissions
- **DRI EAF** = Direct Reduced Iron + Electric Arc Furnace - A steelmaking process that generally produces lower carbon emissions than traditional blast furnace steel production
- **H₂-DRI-EAF** = Hydrogen Direct Reduced Iron + Electric Arc Furnace Emerging "green steel" technology
- **SMR** = Steam Methane Reforming- A common method for producing grey hydrogen

- **CO₂e** = Carbon Dioxide Equivalent/Carbon Emissions Measurement for all harmful greenhouse gases
- **tCO₂e** = Tonnes CO₂e - Standard unit used to measure emissions, calculates embedded emission, determines how many CBAM certificates are required

- **CN Code** = Commodity/HS/Taric/HS code Classifies your goods
- **ROS** = Revenue Online
- **EORI** = Economic Operators Registration Identification (from Revenue for import/exports/postponed VAT)
- **SAD/EAD/EXA/EXD** = Import/Export declarations

Each Tonne of Product = Carbon Footprint

CBAM Makes You Measure and Pay For it!



⚠ 2023-2025 – Transitional Phase:
Importers **only** reported emissions
quarterly – can still access for reporting

⚠ 2026 – Compliance mandatory –
Importers must purchase and
surrender CBAM certificates based on
these emissions >50t of product

- ✓ CBAM imports from ALL non-EU (third) countries (Except: Norway, Switzerland, Iceland or Liechtenstein)
- ✓ Declare emissions embedded in imports and surrender the corresponding certificates each year
- ✓ Guarantee mandatory (if established less than 2 years) --



What Products

High-Emission Industries

Current CBAM-Covered Goods

- ✓ Iron and steel
- ✓ Aluminium
- ✓ Cement**
- ✓ Fertilisers**
- ✓ Hydrogen
- ✓ Electricity

** Incur indirect as well as direct emissions charges

⚠ EU assessing possible expansion of CBAM to additional sectors, including:

- ✓ Chemicals
- ✓ Petrochemicals
- ✓ Plastics
- ✓ Synthetic Rubber
- ✓ Refined Petroleum Products
- ✓ Glass
- ✓ Ceramics
- ✓ Bricks & Tiles
- ✓ Additional downstream manufactured products--

Product HS/CN Codes:


https://ec.europa.eu/taxation_customs/dds2/taric/taric_consultation.jsp?Lang=en

Sector	Primary CN Codes	Direct Emissions	Indirect Emissions
Iron and steel	Chapters 72–73 (7201, 7206–7217, 7301–7307)	Priced	Not priced
Cement	Chapter 25 (2523 10, 2523 21, 2523 29, 2523 30)	Priced	Priced
Aluminium	Chapter 76 (7601, 7604–7608, 7610, 7616)	Priced	Not priced
Fertilizers	Chapters 28, 31 (2814, 3102 10, 3102 30, 3105)	Priced	Priced
Electricity	2716 00 00 only	Priced	N/A
Hydrogen	2804 10 00 only	Priced	Not priced

Who is Affected?:

- ✓ Importers >50t of CBAM-covered goods
- ✓ Industries reliant on high-emission raw materials (construction, automotive, energy, chemicals, etc.)
- ✓ Exporters outside EU selling/supplying CBAM-covered goods to the EU
- ✓ Declarants & Customs Brokers handling compliance for CBAM-covered products --

Why?

- ✓ Fair carbon price to prevent "carbon leakage" where companies move production to countries with weaker climate policies
 - ✓ Ensures imported goods face similar carbon costs as EU-produced goods under the EU ETS
 - ✓ Encourage cleaner industrial production in non-EU countries
 - ✓ Ensure that the EU's climate objectives are not undermined
- 50t threshold applies **per importer, per calendar year, across all CBAM-covered goods**
 - Once the cumulative total >50t PA, CBAM obligations onward, and reporting requirements are triggered for all imports
 - Importers < 50t are outside the scope of CBAM = CBAM does not apply at all
-  If *accidentally* exceed 50t mid-year, you must register immediately and purchase certificates for *all* imports that year! --

**You need to register to be an authorised
CBAM importer once you import >50
Tonnes of CBAM products**

T/F?

Annual Reporting:

If >50t, you must:

- ✓ Be authorised as a declarant
- ✓ Submit one CBAM declaration per year from all imports for the previous calendar year
- ✓ CBAM certificates go on sale February 1, 2027
- ✓ The first CBAM declaration covers 2026 and is due September 30, 2027
- ✓ Manage certificates throughout the year
- ✓ Buy CBAM certificates during the year (Priced quarterly)
- ✓ Obligated to hold 'The 50% Quarterly Holding Requirement' in your account from 1st Jan↓
- ✓ Surrender when you submit your annual declaration
- ✓ Monitor Quarterly Prices – stay updated on carbon market fluctuations --

Quarterly Cert Holding:

- ⚠ Calculation is cumulative from 1 January, not by quarter.
- ⚠ You must hold certificates covering at least 50% of your total embedded emissions imported during the year to date.
- ⚠ You can't wait until year-end to buy all your certificates. You must build them as your imports and emissions grow throughout the year.

Quarter	Cumulative Emissions	Minimum Certificates Required (50%)
Q1	1,000 tCO ₂	500
Q2	2,000 tCO ₂	1,000
Q3	3,000 tCO ₂	1,500
Q4	4,000 tCO ₂	2,000

How it's Applied:

- ✓ Carbon bank account
- ✓ Track emissions during the year, buy certificates as needed, and settle once a year
- ✓ Account-based, not border-paid
- ✗ It is not applied/paid for:
- ✗ Per shipment
- ✗ Via your import declaration on arrival at customs
- ✗ Through Revenue directly

⚠ Once authorised, importers **calculate CBAM based on the embedded emissions** of their imports, **purchase CBAM certificates** via the CBAM Registry at EU ETS-linked prices and **surrender** the required number annually --

You Must Pay CBAM charges at time of import -

T/F?

Self Assessed:

NB to actively monitor cumulative imports during the year to:

- ✓ Project your costs/requirements
- ✓ Avoid unintentionally crossing the threshold without the necessary systems and data in place
- ✓ Avoid penalties/misdeclarations

⚠ If an importer >50T PA, and NOT authorised = liable for **penalties** as well as **cert costs** and **unable to import** further until they become authorised

- ✓ Customs and Revenue monitor totals through your EORI if >50t registration and certs required
- ✓ If audited, you must demonstrate <50t
- ✓ Internal evidence (tracker, SADs, invoices)

⚠ Calculation Spreadsheet with default values:
<https://www.epa.ie/publications/licensing--permitting/climate-change/cbam-liability-calculator.php> --

Practical Tip:

Most small/occasional importers <50-tonne, but Revenue/EU expect you to track/prove:

That means keeping:

- ✓ Import entry data (SADs, CN codes, weights)
- ✓ Supplier origin documents (EUR.1, mill certs, etc.)
- ✓ Your own running total of CBAM-relevant goods per calendar year

How Revenue knows:

Every import into Ireland is declared through customs using your:

- ✓ EORI number
- ✓ CN/HS/Taric/ Commodity code
- ✓ Quantity
- ✓ Country of origin
- ✓ Data in AIS is accessible to Irish Revenue --

Report Timing:

- ✓ Annual Declaration: Companies declare total emissions and surrender CBAM certificates accordingly
- ✓ 2026 is due September 30, 2027 (surrendered against a verified embedded emissions total)
- ✓ If not surrendered by September 30, are cancelled on November 1, if they predate the two-year window. Importers cannot accumulate a bank of certificates across more than two consecutive years.
- ✓ Must be sold back by 31 October of the surrender year for refund
- ✓ Submitted through the CBAM Registry
- ✓ Authorised CBAM declarant states total quantity of CBAM goods imported, the total emissions in tonnes of CO₂e, and surrenders the corresponding CBAM certificates to the NCA
- ✓ Only an authorised CBAM declarant, established in the EU and granted authorisation can submit a CBAM declaration and legally import CBAM goods
- ✓ €100-per-tonne penalty on top of a mandatory certificate purchase (even for shortfalls)--

If Importer is Based Outside of EU:

✓ Must register in the EU

OR

✓ Engage an **indirect customs** agent to take on the reporting and certification responsibility

⚠ An **Indirect** customs agent will use their own authorisation – high risk!

⚠ A **direct** customs agent will use the Importer's authorisation ↓ --

Using Customs Agents:

Indirect customs representatives:

- ✓ Act in their own name
- ✓ Apply for the status of authorised CBAM declarant
- ✓ Shoulder the risk/report and certs BUT the threshold liability is on importer

Direct customs representatives:

- ✓ Act in the name of the importer/exporter
- ✓ Importer registers and buys certs
- ✓ Importer's CBAM authorisation used on declaration
- ✓ ROS Sub cert required
- ✓ Accuracy of import decs is imperative
- ✓ Weights connected to EORI for Revenue tracking --

The Importer must be either be registered in the EU or use an indirect customs agent in the EU to import CBAM goods into the EU

T/F?

Cost Consideration:



Set Up SOPs for:

- ✓ Proactive supplier engagement and emissions tracking
- ✓ Regularly check price trends. Use historical price data to estimate costs
- ✓ Automate reporting & calculations
- ✓ Train teams on procedures and reporting
- ✓ Ensure financial planning includes costs for imports
- ✓ Work with those who understand the process to for optimisation
- ✓ Understand carbon price in jurisdiction of production (if any) and Importation - If emissions data isn't available, CBAM default emissions values can be more costly!
- ✓ Ensure margins are not affective whilst remaining competitive --

Smooth Compliance Systems:

Establish a structured CBAM reporting and payment system:

- ✓ Step 1: Register in the CBAM Authority to submit emissions reports and buy certificates.
- ✓ Step 2: Understand the HS/CN code
- ✓ Step 3: Track CO₂ Emissions and choose suppliers who work with the process
- ✓ Step 4: Ensure calculations factor in CO₂ intensity, weight, and pricing.

✓ Step 5 Monitor EU ETS Carbon Prices

✓ Step 6: Competency – In-house/Outsource

Understand your product, equip your team, choose your supplier wisely, and consider your costs! - -

Strategies:

- ✓ Invest in/source Low-Carbon Alternatives – lower costs
 - ✓ Ensure Supplier Transparency – Work with suppliers to track and report verified carbon emissions
 - ✓ Negotiate with suppliers to reduce emissions
 - ✓ Consider switching suppliers to those in countries with lower carbon intensity or established carbon pricing systems (e.g., Norway)
 - ✓ Use Digital Tools for CBAM Reporting – Automating CBAM calculations can simplify compliance
- ✓ Declarant can request that its member state can buy back a portion of any unused certificates by Oct 31 but will be limits
 - ⚠ Not tradeable --

CBAM Certificates Can be Traded Between Importers

T/F

T

Coffee Break



Players:





Authorisation and Reporting:

AMM

Applications for
Authorisation/registration/additional info
and access gateway for CBAM

Used to:

Apply as declarant

1st **APPL No. supplied** until
approved/authorised declarant

2nd **CBAM account No.**

- ✓ Use EORI to apply for and manage your status as Authorised Declarant
- ✓ Managing authorisation details
- ✓ Updating company information and permissions

✓ If application **before** March 31st, they receive an Application Reference Number to be used on customs import declarations along with TARIC Code Y238 (no limit on what they can import until they are granted full authorisation)

✗ If an importer submits an application after March 31st, they receive a CBAM Application Reference Number but this number is null and void, it won't be accepted as it is associated with an application **post March 31st**. This importer will use Taric Code Y137 on their custom import declaration (**can only import up to 50T with this code until they are granted authorisation which can take up to 120 days or more**)--

Authorisation and Reporting:

Definitive CBAM Registry

For *submission* of annual declaration and *facilitate* the purchase and surrender of CBAM certs

⚠ **Not available until Feb '27**

The official compliance database which holds:

- ✓ Your Authorised CBAM Declarant status
- ✓ Your company account
- ✓ Annual CBAM declarations
- ✓ Embedded emissions data
- ✓ Deductions data
- ✓ Customs-linked import information
- ✓ Your certificate holdings balance
- ✓ Records of certificates purchased, surrendered, repurchased or cancelled
- ✓ Compliance and audit history

CCP (Common Central Platform)

⚠ **Not available yet.**

- ✓ For the purchasing and surrendering of CBAM Certificates--

Authorisation and Reporting:

CBAM Transitional Registry Platform - to complete reporting obligations up to end 2025

Used for:

- ✓ Transitional reporting
- ✓ Submitting quarterly reports up to end 2025
- ✓ Declaring imported goods
- ✓ Reporting embedded emissions data
- ✓ Access Installations/Operators etc.
- ✓ Using supplier or default emissions values
- ✓ Correcting or updating submitted reports --

Setting Up An Account:

- ✓ Have access to (AMM)
- ✓ A digital ROS cert is required:
<https://www.revenue.ie/en/online-services/services/ros/ros-help/getting-started-on-ros/about-ros/what-is-a-ros-digital-certificate.aspx>
- ✓ EORI: Economic Operator Registration and Identification (EORI) number.

Then:

- ✓ Apply for the status of Authorised CBAM Declarant through the EU CBAM Registry on the AMM --

Create Account and Access:

Step 1: Create (Need a ROS cert)

<https://webgate.ec.europa.eu/cas>

- ✓ Register using your email address (a **company email** is strongly recommended), create a password, and confirm your registration via the email link you receive.
- ✓ Set up **two-factor authentication** (EU Login App, QR code, or FIDO2 key)
- ✓ Each user must register **individually**

Step 2: Access Request

<https://cbam.ec.europa.eu/o3cinstallation>.

Log in using your **EU Login** credentials. Complete the form with the following information:

- ✓ **Company details**/registration number/identifiers
- ✓ **Company email** and website
- ✓ **User role** (Admin Operator or Simple Operator)
- ✓ **Upload a single PDF** containing:
- ✓ Company registration certificate (including registration number/identifier matching the one provided in the form)
- ✓ Proof of representation (e.g., power of attorney)
- ✓ ID of the authorised representative --

Logging onto AMM:

<https://cbam.ec.europa.eu/authorised-declarant>

1. Select the application domain you want to access
'Customs'

2. Select the country where you want to be
authenticated
'Ireland'

Select type of actor:
'Economic operator'

I am acting on behalf of:
'Myself'

Or

The following (natural/legal) person with:

Type of actor

'Customs representative/Economic operator' if an
indirect customs agent

Select the type of entity you want to act for, from the
ones available to you

Type of id Please select ID

'EORI number/VAT number'

I give my consent ...

Tick

- ✓ Set email preferences to receive email if contacted by DTCA via AMM. Under
- ✓ user information (top right hand corner)
- ✓ and preferences (in dropdown)--



TAXUD AUTHENTICATION PORTAL UUM&DS

European Commission > TAXUD authentication portal

Where Are You From (wayf)

Select the domain of the application you request access to

Customs

Select the country where you want to be authenticated

Ireland

Select type of actor

Economic Operator

I am acting on behalf of:

- Myself
- The following (natural/legal) person with:
- I give my consent to request my Identity Profile information and share it with UUM&DS and Customs EIS

Submit




i UUM&DS uses ROS digital certificates to provide a secure authentication process. You have been redirected to this page as part of the login process and will be redirected back to the UUM&DS portal after authentication.

Select Certificate

Visum2023 

You can load a digital certificate > [Manage My Certificates](#) **i**

Enter Password

..... 

Authenticate

HOMEPAGE

AUTHORISATIONS



NOTIFICATIONS



SUBMISSIONS



ACCOUNT



Homepage

Unanswered notifications

Reference number	Notification subject	Reception time	Expiry date	Actions
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There is no data available



Unread notifications

Sender type	Sender identifier	Reference number	Notification subject	Reception time	Actions
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There is no data available





Submit application

Stakeholders details Activity details Financial and operational details

i Applicant representation information *

Applicant is acting on own behalf? *

Yes No

Applicant is an indirect customs representative? *

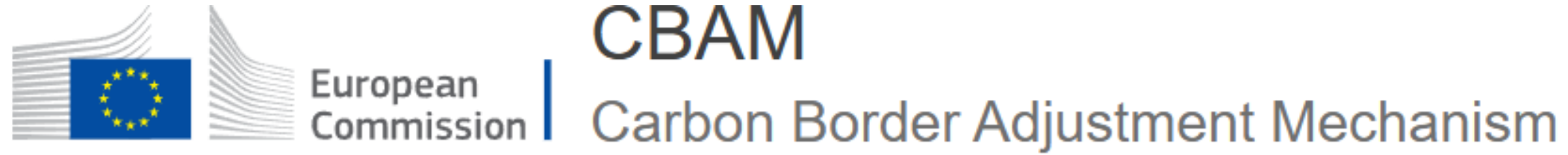
Yes No


Applicant

Actor identification


The Transitional Registry:


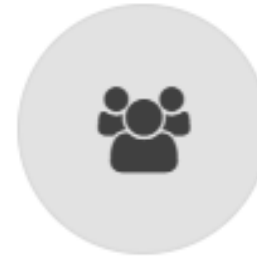

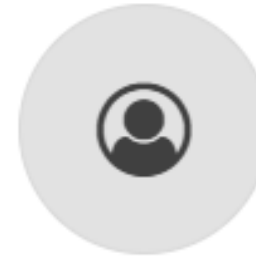



<https://cbam.ec.europa.eu/declarant>



EOR/IE5405687Q
CbamDeclarant 

☰ Session will expire in : 27:52 

 Home Page

-  My Quarterly Reports
[more](#)
-  My Operators
[more](#)
-  My Installations
[more](#)
-  My importers
[more](#)
-  Information
[more](#)
-  Requests
[more](#)
-  My profile information
[more](#)

EU Account check

Step 1: Create

Go to <https://webgate.ec.europa.eu/cas>.

Register using your email address (a company email is best), create a password, and confirm your registration via the email link you receive.

Set up two-factor authentication (EU Login App, QR code, or FIDO2 key).

Each user must register individually.

Step 2: Submit Access Request

Go to <https://cbam.ec.europa.eu/o3cinstallation>

Log in using your EU Login credentials:
Complete the onboarding form

- Company details and registration number
- Company email and website
- User role (Admin Operator or Simple Operator)

Upload PDF documents:

Company registration certificate (including registration number matching the one provided in the form)

Proof of representation (e.g., power of attorney)

ID of the authorised representative --

Break Out Rooms:

When importing CBAM goods from outside the EU:

What products are involved?

How do you decide if you need to register?

What registrations need to be completed?

What internal SOPs/systems should you set up?

What needs to be considered with regard to your supplier?

What paperwork/information do you require from you supplier?

What cost considerations are involved?

What do you need to do with regard to declarations and how do they affect the outcome?

Break Out Room Drilldown:



Products

- ✓ Steel • Aluminium • Cement • Fertilisers • Electricity • Hydrogen
- ✓ Certain downstream products made from these materials
- ✓ Check the product CN code against the CBAM legislation

Registration

- ✓ Check CN codes and CBAM scope
- ✓ Assess if the 50-tonne threshold is exceeded
- ✓ Obtain EORI, EU Login and Authorised CBAM Declarant status

Internal Systems

- ✓ Product classification
- ✓ Supplier data collection
- ✓ Emissions tracking
- ✓ Reporting calendar

Supplier Considerations

- ✓ Can they provide emissions data?
 - ✓ What production method is used?
 - ✓ Have carbon costs already been paid?
- ### Information Required
- ✓ Production site details
 - ✓ Embedded emissions data
 - ✓ Carbon cost evidence
 - ✓ Verification reports (if applicable)
 - ✓ Are they registered on EU CBAM platform

Cost Considerations

- ✓ CBAM certificates
- ✓ Embedded emissions
- ✓ Verification costs
- ✓ Compliance & administration

Declarations

- ✓ Maintain accurate records
- ✓ Submit declarations on time
- ✓ Surrender required certificates
- ✓ Indirect or direct customs agent--

⚠ Better supplier data = Lower risk and potentially lower CBAM costs.

Lunch



Where to Get Certs:

✓ Authorised declarants purchase CBAM cert exclusively from their NCA through the CBAM Registry's certificate management module, which opens February 1, 2027.

✗ No secondary market exists: Certs can only be purchased from and sold back to the NCA (at the same price). No exchange trading, no bilateral transfers between declarants

💡 Buying in quarterly tranches aligned with the holding requirement is the most efficient approach

- ✓ **Confirm authorization status.** Only an authorised CBAM declarant can purchase certificates
- ✓ **Access the CBAM Registry.** Log in through the EU Customs Trader Portal using UUM&DS authentication (the same system used for EU ETS registry access) and shows your current certificate holdings, import transaction history fed in by customs authorities, and the current published certificate price.
- ✓ **Calculate the quantity needed.** Based on your cumulative embedded emissions to date and the quarterly holding requirement
- ✓ **Submit the purchase order.** Place the purchase order through the Common Central Platform operated by DG TAXUD. Payment is at the current weekly average EU ETS auction closing price. Certificates appear in your registry account immediately upon purchase

How CBAM Charges Work:

- ✓ Based on market rates of embedded CO₂ emissions per volume measurement (like wgt or ltr)
 - ✓ Linked to EU ETS carbon price
https://taxation-customs.ec.europa.eu/carbon-border-adjustment-mechanism/price-cbam-certificates_en?utm
 - ✓ Fluctuates Quarterly post quarter
 - ✓ Deductions if carbon taxes already paid in the country of origin - definitive proof required
1. Embedded emissions tell you how many certificates you need
 2. Certificate price tells you what they cost Certificate costs rise and fall in direct proportion to the [EU ETS](#) carbon price.--

Emissions:

Product	Production Method	Typical Emissions (tCO ₂ e/t)	Gross CBAM Cost @ €75/tCO ₂
Steel	Blast Furnace (BF-BOF)	2.0	€150/t
Steel	Electric Arc Furnace (EAF)	0.5	€37.50/t
Cement	Portland Cement	0.83	€62.25/t
Aluminium	Primary Aluminium	1.5	€112.50/t
Fertilisers	Urea	2.5	€187.50/t
Hydrogen	Grey Hydrogen	9-12	€675-900/t

Note: These are gross costs before the **SEFA free allocation adjustment**. In 2026, the CBAM factor is 2.5% (97.5% of free allocation remains), meaning the net certificate obligation is only 2.5% of the gross figure above. A declarant importing 10,000 tonnes of BF-BOF steel with 2.0 tCO₂/t of embedded emissions faces a net 2026 certificate obligation of 500 certificates (10,000 × 2.0 × 2.5%), valued at approximately €37,500 at €75/tCO₂.

Behind the Emissions Number:



Supplier calculates it using:

- ✓ Fuel consumption (gas, coal etc.)
- ✓ Electricity usage
- ✓ Emission factors
- ✓ Production output
- ✓ Based on methodologies aligned with the European Commission CBAM rules

⚠ For the *same steel product*:

EAF route → ~0.5–1.0 tCO₂/tonne

BF-BOF route → ~1.8–2.5 tCO₂/tonne

That difference drives your cost

*“No emissions data =
Guesswork.
Good emissions data = Cost
control.” --*

Converting Emissions into Certs

Importers must buy certs to cover embedded emissions – at least 50% quarterly in arrears and 100% at year end to be surrendered by following September

✓ Price of CBAM certificates is priced quarterly (rise and fall in direct proportion to the EU ETS carbon price)

https://taxation-customs.ec.europa.eu/carbon-border-adjustment-mechanism/price-cbam-certificates_en?utm_--

Deductions:

If the exporting country already imposes a carbon price, it must be verified and that amount is deducted from the CBAM cost.


Example:

Exporter paid €30 per tonne of CO₂ in their home country, the importer only pays:

→ €120 - €30 = €90 per tonne of steel in CBAM certificates

The importer must have evidence.

- ✓ Carbon tax receipts
- ✓ Emissions trading invoices
- ✓ Official payment records
- ✓ Verification from the supplier
- ✓ Documentation linking the payment to the imported goods --

 The net cost of CBAM certificate surrender grows every year as EU ETS free allocation for CBAM sectors is phased out between 2026 and 2034

Year	CBAM Factor	Free Allocation Remaining	Net Cost per €75 Certificate (BF-BOF Steel)
2026	2.5%	97.5%	€3.75/t
2027	5%	95%	€7.50/t
2028	10%	90%	€15.00/t
2029	22.5%	77.5%	€33.75/t
2030	48.5%	51.5%	€72.75/t
2034	100%	0%	€150.00/t

Compliance Deadlines 2027:

- 📌 1 February 2027 - CBAM certificate sales open
- 📌 31 March 2027 - Q1 certificate holding check
Hold certificates covering at least 50% of cumulative emissions
- 📌 30 June 2027 - Q2 certificate holding check
- 📌 30 September 2027 - First annual CBAM declaration due (for 2026 imports) -
Required CBAM certificates must be surrendered
Q3 certificate holding check
- 📌 31 October 2027 - Deadline to sell back up to 50% of unused certificates.
- 📌 31 December 2027 - Q4 certificate holding check
- 📌 1 November 2028
Any unused 2027 certificates are permanently cancelled

Key Takeaways

- ✅ Buy certificates from **February 2027**
- ✅ Maintain minimum certificate holdings throughout the year
- ✅ Submit annual declaration and surrender certificates by **30 September**
- ✅ Unused certificates may be sold back before **31 October**
- ⚠️ Missed deadlines may result in penalties and additional compliance costs and pay for certs--

Direct/Indirect Embedded Emissions

Calculated at production installation level:



Direct: (Outputs)

- ✓ Greenhouse gas emissions released during the production process at the production installation, including emissions from combustion of fuels, process chemistry, and the generation of heat and cooling consumed at the site.
- ✓ These are Scope 1 emissions in standard carbon accounting terminology.

Indirect: (Inputs)

- ✓ From the production of electricity that is consumed during the production of the goods.
- ✓ These are Scope 2 emissions. Their inclusion in CBAM depends on sector designation, not on how much electricity a facility actually uses
- ✓ Cement and fertilisers --

Direct + Indirect = Total Emissions

Specific Embedded Emission (SEE) Formula:

**1. Direct Embedded Emissions
(Output) - Direct EE = Activity
Data × Emission Factor ×
Oxidation Factor**

**2. Indirect EE (Input) =
Electricity/fuel Consumed (MWh)
× Emission Factor of Electricity
(tCO₂/MWh)**

**Direct Embedded Emissions +
Indirect Embedded Emissions)/Net
Production (tonnes)**

Where:

- Activity data is the quantity of fuel or material consumed (measured in tonnes, cubic meters, or GJ)
- Emission factor is the CO₂ released per unit of fuel or material (tCO₂/unit)
- Oxidation factor accounts for incomplete combustion (typically 0.99 to 1.0 for natural gas, 0.98 for coal) --

How to Calculate Emissions Data:

Determine Embedded Carbon Emissions - Importers calculate the carbon emissions embedded in their products.

Consider:

✓ Direct Emissions – From production processes

✓

Indirect Emissions – From electricity used in production - cement and fertilisers

Example:

A steel product imported into the EU has an embedded carbon footprint of 1.5 tonnes of CO₂ per tonne of steel.

The CBAM calculation formula:

CBAM obligation (€) is Specific Embedded Emissions (tCO₂e/t) × Quantity (tonnes) × EU ETS price (€/tCO₂e)

- If the EU carbon price is €80 per tonne of CO₂, then:
→ 1.5 tonnes CO₂ × €80 = €120 CBAM cost per tonne --

EE Emissions Calculation:

Step 1: Identify the Production Method

- ✓ Determine how product was manufactured (e.g. Blast Furnace, Electric Arc Furnace). Each produce different carbon emissions.

Step 2: Collect Emissions Data

- ✓ Gather information:
Fuel & Raw materials used, Electricity consumed
Production volumes

Step 3: Calculate Direct Emissions

- ✓ Apply emission factors to fuel and process data.
This calculates the CO₂ generated during production

Step 4: Calculate Indirect Emissions (where applicable)

- ✓ Include emissions from electricity consumption.

Step 5: Calculate Emissions per Tonne

- ✓ **Total Emissions ÷ Total Production = Embedded Emissions**

- Example:
• 20,000 tCO₂ ÷ 10,000 tonnes steel
• = **2.0 tCO₂ per tonne**

So:

- Production Data ↓
- Calculate Total Emissions ↓
- Add Electricity Emissions (if applicable) ↓
- Divide by Tonnes Produced ↓
- Embedded Emissions (tCO₂e/t) ↓

Key Takeaway: Embedded Emissions = Total Carbon Produced ÷ Total Quantity Produced --

How to Calculate Emissions Data:

Product	Emission Factor (tCO ₂ e/t)	Gross Cost @ €50/tCO ₂	Gross Cost @ €75/tCO ₂	Gross Cost @ €100/tCO ₂
Steel (BF - BOF)	~2.0	€100/t	€150/t	€200/t
Steel (EAF scrap)	~0.5	€25/t	€37.50/t	€50/t
Cement (Portland)	~0.83	€41.50/t	€62.25/t	€83/t
Primary aluminium	~1.5	€75/t	€112.50/t	€150/t
Urea fertilizer	~2.5	€125/t	€187.50/t	€250/t
Grey hydrogen (SMR)	~9-12	€450-600/t	€675-900/t	€900-1,200/t
Green hydrogen	~0	€0/t	€0/t	€0/t

Cert Prices:

CBAM Certificate price

Quarter of application	Date of publication	Price (€)
Q1 2026	7 April 2026	75,36
Q2 2026	6 July 2026	
Q3 2026	5 October 2026	
Q4 2026	4 January 2027	

Calculating tonnes of CO₂:

Tonnes of CO₂ = Quantity of goods × Emissions per tonne

Step 1: Know your quantity e.g. 10,000 tonnes of steel

Step 2: Get emissions per tonne (key)

I. Supplier actual data (best option) **from where?**

OR

II. Default values from EU (fallback) - Usually higher than real emissions. Designed to discourage lazy reporting

Info on self assessment tools and definitive benchmarking etc. at:

https://taxation-customs.ec.europa.eu/carbon-border-adjustment-mechanism/cbam-legislation-and-guidance-en?utm_source=chatgpt.com#default-values-and-benchmarks-definitive-period

Step 3: Multiply


- Quantity: 10,000 tonnes steel
- Emissions factor: if 0.7 tCO₂ / tonne
- 10,000 × 0.7 = 7,000 tonnes CO₂
- 7,000 Tonnes X cert cost

Step 4: Split emissions (important for reporting)

CBAM requires:


- A. Direct emissions from fuel, combustion, production process
- B. Indirect emissions from electricity used - cement and fertilisers only (electricity consumed in production)
- Both may need to be reported depending on the product --

Simple example:

Tonnes Imported
×
Emissions Factor
×
CBAM Phase-In %
×
Certificate Price
=
 CBAM Cost

10 tonnes steel
× 2.0 tCO₂ (EU emissions Factor)
= 20,000 tCO₂
× 2.5% (2026 CBAM factor)
= 500 Certificates
× €75
= €37,500 CBAM Cost

But

If Supplier Carbon Price Paid & Proven
 CBAM Cost = €37,500
— Carbon Cost Credit 30 (500x30)
=15,000
 Reduced CBAM Cost of €22,500--

The CBAM factor is currently brings cost of emissions to 2.5% BUT will increase year on year until 100% in 2034?

T/F

Third Country Operators:

- ✓ The portal allows operators to ensure the confidential treatment of business-sensitive data.
- ✓ Reporting declarants are then able to automatically populate their CBAM reports with this emissions data in order to comply with their reporting obligation.
- ✓ CBAM declarants need to share their EORI number with the supplier outside the CBAM Registry.
- ✓ In a future updates, operators will be given the option to share their information with all interested declarants
- ✓ Info at:
https://taxation-customs.ec.europa.eu/carbon-border-adjustment-mechanism/cbam-registry-and-reporting_en?utm_--

Third Country Suppliers:

Third country Supplier/Exporter/ Producer Provide embedded emissions data for your products.

- Register in the EU O3CI system (Operator of the Third Country Installation) to share verified emissions data directly with EU importers. link is: <https://cbam.ec.europa.eu/o3cinstallation>
- Follow the EU's CBAM calculation methodology

*** *Not legally obliged* to register but if not, importers forced to use default emission values at a higher rate, can make goods look more carbon-intensive (less competitive).

- Obtain/set up an EU Login account (Webgate) — with 2FA enabled, linked to your company email.
- Go to <https://cbam.ec.europa.eu/o3cinstallation> and choose the O3CI / “Third Country Operator” access request path.
- Complete the access request form: provide your company details

Upload supporting documents: e.g. business registration, proof of representation, documents proving you operate the installations.

Wait for the Commission / CBAM registry team to review and approve your access.

Once approved, you'll log in, create your operator record, register installations, set up production routes, and upload emissions & activity data.

Optionally share your installation/emissions data with EU importers (by linking their EORI) --

Third Country Operators Must register and connect the EU CBAM importer for the importer be able to use verified CO2 emissions data

T/F

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How to File a CBAM Declaration:

Step 1: Gather Import Data:

- ✓ CN code
 - ✓ Quantity imported
 - ✓ Country of origin
 - ✓ Production installation (factory/mill details)
- ✓ Customs sends import data to the CBAM Registry, but importers must verify it against their own records.
- ⚠ Missing production site information can create major compliance issues later.

Step 2: Calculate Embedded Emissions

- ✓ Quantity Imported × Emissions Factor = Total Embedded Emissions

Example:

10,000 tonnes steel X 2.0 tCO₂e per tonne
= 20,000 tCO₂e

Emissions can be obtained from:

- ✓ Actual supplier data (preferred)
- ⚠ EU default values (usually higher and more costly! See link) --

How to File a CBAM Declaration:

Step 3: Verify Emissions Data

⚠ If using actual supplier emissions data, it must be verified by accredited independent verifier before submission

- ✓ Verification is mandatory
- ✓ The 1st verification requires a physical visit to the production installation.
- ✓ Verification can be expensive, especially where multiple suppliers or production sites are involved

⚠ Engage verifiers early to avoid delays and capacity shortages
Alternative: Use EU default values, which do not require verification but may result in higher CBAM costs

Step 4: Purchase CBAM Certificates

- ✓ Used to cover the embedded emissions in imported goods
- ✓ Can only be purchased through the CBAM system - through the CBAM Registry
- ✓ Prices are linked to the EU ETS carbon price
- ✓ Importers purchase certificates and surrender to match their reported emissions

⚠ No secondary market or trading between importers

How to File a CBAM Declaration:

Step 5: Maintain Required Certificate Holdings

- ✓ Throughout year, importers must hold enough CBAM certs in account
- ✓ At the end of each quarter, certificate holdings must cover the required proportion of embedded emissions
- ✓ Authorities monitor compliance and may issue notices where holdings are insufficient

💡 Excess certificates may be sold back to the authority only - CBAM rules

⚠️ Failure to maintain sufficient holdings may trigger enforcement action

Step 6: Submit the Annual CBAM Declaration

- ✓ Submitted electronically through CBAM Registry

Must include:

- ✓ Quantity of CBAM goods imported
- ✓ Embedded emissions associated with those imports
- ✓ Number of CBAM certificates required
- ✓ Evidence of any carbon price paid in the country of origin
- ✓ Verification reports (actual emissions data)
- ✓ Any applicable adjustments or deductions verified

⚠️ Supporting records must be retained for several years in case of audit.

How to File a CBAM Declaration:

Step 7: Surrender CBAM Certificates

When submitted, the required CBAM certs must be surrendered at same time

- ✓ Certificates are automatically cancelled once surrendered
- ✓ There is no additional grace period after the filing deadline

- ⚠ Insufficient certificates can result in:
 - ✗ Financial penalties
 - ✗ Requirement to purchase missing certificates
 - ✗ Continued compliance obligations --

- ✓ Submit the annual declaration through the CBAM Registry to your NCA.

The declaration must include:

- ✓ Total quantity of CBAM goods by type and country of origin, total verified embedded emissions, certificates surrendered, and documentation of any deductions claimed

Break Out Rooms: 2/3 Groups

**#1. First time (but expect >50t in 2026) importing CBAM Goods from a Non-EU Country:
Consider:
Registration, strategies, cost savings options, declarations/declarant, reports and surrender.**

**Work out what should be due if:
20 tonnes steel with 2.0 tCO₂ (EU emissions Factor) Cert cost €75.36 with Verified and
registered as operator/installation supplier cost paid €30**

**#2. First time (but expect >50t in 2026) importing CBAM Goods from a Non-EU Country.
Consider:
Registration, strategies, costs savings options, declarations/declaration and surrender.**

**Work out what should be due if:
20 tonnes steel with 2.0 tCO₂ (EU emissions Factor) 2.5% (2026 CBAM factor) Cert cost €75.36
with supplier says the cost paid in their country €30**

Case Studies Drilldown

- ✓ Classify/Understand your goods
- ✓ Projections - > 50T PA with costs
- ✓ Consult training/EPA/EU platform
- ✓ Register to be authorised
- ✓ Declarant – You, direct or indirect customs agent – safe pair of hands
- ✓ Declarations – use of APPL No. or Authorised No.
- ✓ Supplier- Transparency and consultation of various suppliers -verify/solid proof of authorisation/registration/figures/emissions/costs paid in third country (otherwise EU default emissions data)
- ✓ 50% of quarterly requirements accounted for in register....

20 tonnes steel
× 2.0 tCO₂ (EU emissions Factor)
= 40,000 tCO₂
× 2.5% (2026 CBAM factor)
= 1000 Certificates
× €75
= €75,000 CBAM Cost/€3750 per ton

But

If Supplier Carbon Price Paid & Proven
🇪🇺 CBAM Cost = €75,000
— Carbon Cost Credit of €30 per cert (on #2)
= (1000X30/€75,000- €30,000 =
Reduced CBAM Cost of €45,000/€ 2,250 per ton --

"Classify it (CN), Import it (EORI), Measure it (CO₂e), Verify it (MRV), Report it (CBAM), Pay for it (EU ETS)"

Some Useful Links

Checklist Mandatory <https://www.epa.ie/publications/licensing--permitting/climate-change/Declarant-checklist-for-application-for-status-of-authorized-CBAM-declarant-Dec-2025.pdf>

What do I need?

<https://www.epa.ie/publications/licensing--permitting/climate-change/Declarant-checklist-for-application-for-status-of-authorized-CBAM-declarant-Dec-2025.pdf>

AMM and Definitive Registry <https://cbam.ec.europa.eu/authorized-declarant>

CBAM Europa Webpage: https://taxation-customs.ec.europa.eu/carbon-border-adjustment-mechanism_en

Europa Learning Portal: <https://customs-taxation.learning.europa.eu/local/mvpgtaxud/pages/mvpgtaxud-trainee/my/index.php>

Europa Learning Portal: <https://customs-taxation.learning.europa.eu/enrol/index.php?id=862>

CBAM Guide/Cost Calculator/CN Code Lookup/Price Tracker/Guides: <https://cbamguide.com/>

CBAM Guide: <https://cbamguide.com/learn/eu-cbam/>

CBAM Compliance Hub: <https://cbamguide.com/compliance/>

***How to file a declaration: <https://cbamguide.com/compliance/declaration/>

How to calculate Direct and Indirect Emissions: <https://cbamguide.com/compliance/embedded-emissions/>

How to buy, Hold and Surrender Certs: <https://cbamguide.com/compliance/certificates/>

CBAM Registry: https://taxation-customs.ec.europa.eu/carbon-border-adjustment-mechanism_en

CBAM Info: <https://www.epa.ie/our-services/licensing/climate-change/eu-carbon-border-adjustment-mechanism/#d.en.137002>

Useful info: https://taxation-customs.ec.europa.eu/carbon-border-adjustment-mechanism/cbam-registry-and-reporting_en#authorisation-management-module

CN Code Spread sheet: <https://www.epa.ie/publications/licensing--permitting/climate-change/cbam-cn-code-spreadsheet.php>

FAQ document available here - [European Commission CBAM FAQ Document](#)

Contacts:

CBAM National Competent Authority in Ireland (Environmental Protection Agency) cbam@epa.ie Tel: +35312680100 Website <https://www.epa.ie/our-services/licensing/climate-change/eu-carbon-border-adjustment-mechanism/>

CBAM Irish Customs Authority at importpolicy@revenue.ie Tel: +35317383676 (for Customs-related queries)

Questions?

CMG

It Has Been a Pleasure!

CMG

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