



## **CBAM - Carbon Border Adjustment Mechanism**

The European Union's taxation initiative to ensure the carbon price on imports is equivalent to the carbon price paid for domestic production



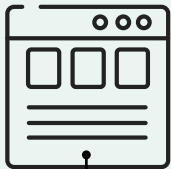


## Context

# CBAM moves to the next step in the implementation calendar, where reporting of actual emissions associated with CBAM goods becomes mandatory

Regulation (EU) 2023/956 regarding the Carbon Border Adjustment Mechanism (CBAM) is a European Union (EU) defines **CBAM Products** and establishes carbon tax rules for: cement, hydrogen, fertilizers, iron and steel, aluminium and electricity.

## Implementation Stages



### Transitional stage

**Declarants are only required to report quarterly on imports of CBAM goods and the carbon dioxide emissions associated with their production.**

- The first three reports could be prepared by declarants based on the implicit emission values published by the European Commission. With the third quarter of 2024, declarants have to submit reports containing the actual emissions generated in the production of goods.
- As of July 2024, importers must obtain from suppliers information on the installation where the goods were produced, the location of the facility, the production processes and specific parameters, the embodied direct and indirect emissions and the monitoring methodology (including precursors in the case of complex goods) including information on the carbon price due if applicable.
- Starting with December 31, 2024, the authorization process as an authorized CBAM declarant begins. Authorization is required to be able to carry out imports from 1 January 2026.



### Operational stage

**Declarants have both annual reporting obligations and obligations regarding the acquisition of CBAM certificates for each metric ton of CO<sub>2</sub> equivalent (tCO<sub>2</sub>e) emissions.**

**Only importers with the status of authorized CBAM declarant will be able to carry out CBAM imports**

# Steps needed to ensure compliance with the CBAM regulation

01

## Carrying out an analysis on imports

Importers must carry out an analysis on imports made since October 2023, to identify whether they have imported CBAM products

02

## Contacting suppliers to obtain the information necessary for reporting

Importers of CBAM goods should contact suppliers to obtain the necessary information for the preparation of reports.

03

## CBAM Compliance

Importers of CBAM goods should conduct a quarterly analysis of imports and centralize the information required for reporting.

On a quarterly basis, importers of CBAM goods should access the CBAM portal provided by the European Commission, complete the required information and submit the report.

04

## Preparing for the operational phase

Importers of CBAM goods must obtain the status of authorized CBAM declarant in 2025 in order to be able to import CBAM goods from 1st of January, 2026.

CBAM declarants must prepare for the purchase of CBAM certificates and estimate the financial impact on the company.



## How can we help you?

The Deloitte team is made up of professionals with the necessary expertise and can help you with:

- ✔ **Presentation of the implications of the CBAM regulation and carrying out an impact analysis on your company;**
- ✔ **Dedicated workshops to guide you on CBAM reporting obligations and introduce you to our recommended approach to managing CBAM implications**
- ✔ **Support in all stages of CBAM implementation:**
  - registration and authorization in the dedicated portal for CBAM reporting;
  - providing the list of information necessary to be collected for CBAM reports;
  - verifying the information collected by the importer, so that it is complete, for the correct preparation of the CBAM report;
  - draft of reports based on the information collected by the importer;
  - preparation for the next CBAM stages



# Contact

---



**Raluca Bâldea**  
**Partner | Indirect Tax**  
E-mail: [rbaldea@deloittece.com](mailto:rbaldea@deloittece.com)  
Phone: +40 730 665 295



**Ana-Maria Săbiescu**  
**Director | Indirect Tax**  
E-mail: [asabiescu@deloittece.com](mailto:asabiescu@deloittece.com)  
Phone: +40 725 726 157



**Vladislav Dabia**  
**Senior Manager | Global Trade Advisory**  
E-mail: [vdabija@deloittece.com](mailto:vdabija@deloittece.com)  
Phone: +40 740 669 334

Deloitte refers to one or more of Deloitte Touche Tohmatsu Limited (“DTTL”), its global network of member firms, and their related entities (collectively, the “Deloitte organization”). DTTL (also referred to as “Deloitte Global”) and each of its member firms and related entities are legally separate and independent entities, which cannot obligate or bind each other in respect of third parties. DTTL and each DTTL member firm and related entity is liable only for its own acts and omissions, and not those of each other. DTTL does not provide services to clients. Please see [www.deloitte.com/about](http://www.deloitte.com/about) to learn more.

Deloitte provides industry-leading audit and assurance, tax and legal, consulting, financial advisory, and risk advisory services to nearly 90% of the Fortune Global 500® and thousands of private companies. Deloitte spans more than 150 countries and territories. Learn how Deloitte's approximately 457,000 people make an impact that matters at [www.deloitte.com](http://www.deloitte.com).

In Romania, the services are provided by Deloitte Audit SRL, Deloitte Tax SRL, Deloitte Consultanta SRL, Deloitte Accounting SRL, Deloitte Fiscal Representative SRL, Deloitte Tehnologie SRL, Deloitte Support Services SRL, Deloitte Shared Services SRL as well as Reff & Asociații SPRL, the correspondent law firm of Deloitte in Romania, (jointly referred to as “Deloitte Romania”) which are affiliates of Deloitte Central Europe Holdings Limited. Deloitte Romania is one of the leading professional services organizations in the country providing services in professional areas of audit, tax, legal, management consulting, financial advisory, risk management services, outsourcing solutions and technology consulting and other related services through over 3.400 national and specialized expatriate professionals. To learn more about how Deloitte makes an impact that matters, please visit [www.deloitte.ro](http://www.deloitte.ro) and connect with us on [Facebook](#), [LinkedIn](#), [YouTube](#) and [Instagram](#).

This communication and any attachment to it is for internal distribution among personnel of Deloitte Touche Tohmatsu Limited (“DTTL”), its global network of member firms and their related entities (collectively, the “Deloitte organization”). It may contain confidential information and is intended solely for the use of the individual or entity to whom it is addressed. If you are not the intended recipient, please notify us immediately, do not use this communication in any way and then delete it and all copies of it on your system.

None of DTTL, its member firms, related entities, employees or agents shall be responsible for any loss or damage whatsoever arising directly or indirectly in connection with any person relying on this communication. DTTL and each of its member firms, and their related entities, are legally separate and independent entities.