Questions and answer from the 07/05/2025 webinar

1. What is the deadline for this request for authorization?

You need to have an authorization to import CBAM goods. If you don’t plan on doing so, there is no deadline. The technical deadline is to have it 1 day before you import CBAM goods after the first January 2026 has passed. Because it is impossible to judge in advance how the workload will be to evaluate said application, it is recommended to request it as soon as possible.

The practical deadline to have the authorization is by 1st January 2026.

1. What happens if we under-evaluate the quantity we will import in 2026? For example, due to a sudden growth of the business

The application is based on historical records, current imports and estimations. Once you have the authorization, you cannot lose it based on a change in imports.

In cases where the importer has been established for less than 2 years, a guarantee has to be provided. Since this guarantee is made using forecasts, a new one has to be provided if more than the amount indicated has been imported cumulatively at any time during the year.

1. Is 50 Tons mass from the omnibus package for each HS code or globally?

The 50 tons mass threshold has to be considered for the total net mass of each CN code imported over the year. If 10 tons of CN 73041100 are imported together with 45 tons of CN 730629020, then a declaration is necessary.

Do note that hydrogen and electricity are exempted from the 50-ton rule and stay at 150 €. If you import 200 € worth of hydrogen and 49 tons of CN 73041100, then you need to declare and surrender allowances for both

1. Will you share this PowerPoint?

The PowerPoint can be found on our [website](https://environnement.public.lu/fr/emweltprozeduren/Autorisations/cbam.html) under “Webinar 06/05/2025”

1. Is there any need for 3rd party certification of the supplier data? Will the verifier need to be accredited? Will we need Chinese verifiers if we import from China?

Yes, the actual data obtained from operators will have to be verified to be used on the registry. Else you have to use the default values. The verifiers will need to be accredited by a European accreditation body. The implementing and delegated regulations will be published soon for reviewing and aim to be accepted before the end of Q3 2025. It is unclear right now if verifying will be limited to European or international verifiers.

1. The defaults value provided by O3CI are linked to info provided by supplier or related to geographical position or other?

The O3CI module contains actual data and not default values. The values provided are supplied for a specific installation of an operator.

The default values of the definitive phase are likely to be per country.

1. Is there additional HS codes to be implemented in definitive phase?

At the end of the transitional phase, the Commission will publish a report evaluating the information obtained since Q4 2023 and suggest additional goods to be included in the CBAM. These goods are most likely to be found on the carbon leakage list: <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32019D0708&qid=1747120320074>

They can also be precursors, downstream products or scraps linked to current CBAM goods.

1. Is the cost/t of co2 the same with default values and actual data?

The cost per ton of CO2 is the same since it is linked to the ETS allowance price. Actual data will always be lower than default values, since you would use default values in case they were higher. This lower value decreases the overall price and thus the cost will be lower with actual data.

1. Until my data is verified, I need to use default values, right?

Yes.