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CBAM BRIEFING FOR IRISH IMPORTERS

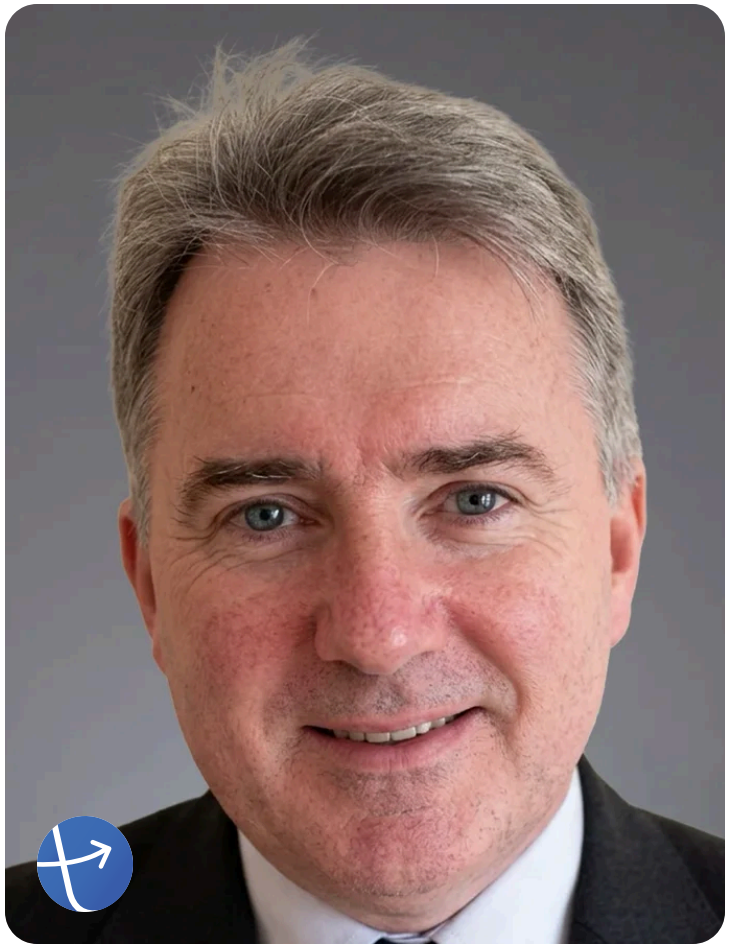
Your 2026 imports already carry a carbon bill. It arrives in 2027.

What importers of cement, iron and steel, aluminium, fertilisers, electricity and hydrogen need to do before the first CBAM declaration on 30 September 2027.

Andrew O' Connor

Managing Director, Customs Accounting Services
Truo Trade advisor





YOUR SPEAKER

Andrew O' Connor

Managing Director, Customs Accounting Services · Truo Trade advisor

A finance and tax professional who also runs a customs practice. Andrew files the declarations, classifies the goods and deals with Revenue and HMRC, so when a container is held at Dublin Port, he's often the one on the phone.

CUSTOMS

Declarations at the border

Customs declarations, tariff classification and import VAT for Irish and UK traders.

FINANCE & TAX

Numbers that stand up

Tax compliance, IFRS, Irish/UK and US GAAP, ERP, treasury, regulatory reporting and audit.

CBAM IN PRACTICE

Straight to the source

Works with importers on CBAM and takes the open questions directly to the EPA's CBAM team.

THE SHORT VERSION

Imported more than 50 tonnes of CBAM goods from outside the EU in 2026? You pay for the carbon in 2027.

50 t

CBAM goods per calendar year, added up across all of them. Above it, CBAM applies.

1 Feb 2027

CBAM certificates go on sale to authorised declarants.

30 Sep 2027

First annual declaration and certificate surrender, covering everything imported in 2026.

The bill is for goods you have **already brought in**. With five weeks of 2026 left, your tonnage is nearly fixed. The emissions data, the paperwork and the cash are not.

Sources: Regulation (EU) 2023/956 as amended October 2025; EPA CBAM Newsletter, March 2026; EPA CBAM certificates guidance.

WHY CBAM EXISTS

CBAM puts the EU's carbon price on imports, so production can't just move abroad to avoid it

THE PROBLEM

Carbon leakage

Carbon-intensive production could move to countries with weaker climate rules, and the emissions would simply happen somewhere else.

THE MECHANISM

Same price as EU producers

EU plants pay for carbon under the EU Emissions Trading System (ETS). Importers buy CBAM certificates priced off the ETS. **One certificate = one tonne of CO_2e.**

THE RAMP

Grows as free allowances end

EU producers lose their free ETS allowances between 2026 and 2034. As they do, importers pay for a larger share of the embedded carbon.

In Irish law since October 2024 (**S.I. 539 of 2024**). The **EPA** runs CBAM in Ireland; **Revenue** handles the customs side.

Sources: Regulation (EU) 2023/956; S.I. No. 539/2024; EPA CBAM Newsletter, March 2026.

WHAT'S COVERED

Six sectors, chosen because they carry the most carbon

Ce

Cement

Clinker, Portland and aluminous cement, cement for building and civil works

Fe

Iron and steel

Pig iron, sheet, bars, wire, tubes, structures, screws, bolts and fixings

Al

Aluminium

Unwrought aluminium, bars, profiles, plates, foil, tubes and structures

N

Fertilisers

Ammonia, nitric acid, urea and nitrogen-based mixed fertilisers

kWh

Electricity

Imported electricity. **No 50-tonne threshold.**

H_2

Hydrogen

Imported hydrogen. **No 50-tonne threshold.**

The 50-tonne test adds up everything you import in a calendar year across cement, iron and steel, aluminium and fertilisers. Check your exact CN codes against Annex I of the CBAM Regulation or TARIC: a product name alone is not enough.

~200k → ~18k

importers in scope after the 2025 threshold change, with about 99% of imported emissions still covered.

KEY DATES

From reporting to paying: where we are now



Sources: EPA CBAM Newsletter, March 2026; EPA CBAM certificates guidance; European Commission proposal, December 2025.

WHO DOES WHAT

Three bodies, three jobs. Know which one to ask.

NATIONAL COMPETENT AUTHORITY

EPA

- Grants and revokes Authorised CBAM Declarant status
- Sells CBAM certificates
- Compliance and enforcement
- Supports declarants (newsletter, guides, calculation tool)

CUSTOMS AUTHORITY

Revenue

- The customs side of CBAM: declarations, TARIC codes, checks at import
- Customs queries: importpolicy@revenue.ie

RUNS THE SYSTEM

European Commission

- CBAM Registry and the 50-tonne threshold monitoring
- Publishes the certificate price
- Runs the Common Central Platform from 2027
- Reviews declarations with the EPA

Your **customs declarations** are where it starts: the CBAM account number on each entry decides who carries the obligation.

Source: EPA CBAM Newsletter, March 2026, sections 2 and 4.

STEP ONE

Over 50 tonnes? You must be an Authorised CBAM Declarant

1. **Apply on the Declarants Portal.** Importers, or an indirect customs representative on their behalf. The EPA has a step-by-step guide and checklist.
2. **Answer EPA follow-up questions on time.** Late replies hold up your authorisation.
3. **While pending:** put your CBAM **application reference** on customs declarations with TARIC document code **Y238**.
4. **Once granted:** use your CBAM **account number** with TARIC code **Y128**. You can then log in to the CBAM Registry.

FROM THE CUSTOMS DESK

Check every 2026 entry

Ask your broker for a list of your 2026 import entries with CN codes, net mass and the CBAM reference used. Missing or wrong references are far easier to fix now than in September 2027.

If you use an **indirect** representative, agree in writing who holds the CBAM obligation.

Source: EPA CBAM Newsletter, March 2026, section 3; Revenue eCustoms Helpdesk notification on CBAM TARIC codes.

HOW THE BILL IS WORKED OUT

Five inputs decide how many certificates you buy

Tonnes imported
Net mass per CN code, from your customs declarations

×

Embedded emissions per tonne
Commission default value for the product and country, or your supplier's verified actual value

−

Free-allocation adjustment
CBAM benchmark × the year's CBAM factor (97.5% in 2026, falling to 0 by 2034)

−

Carbon price paid abroad
Deduction for carbon tax paid in the country of origin. Rules still awaited.

= Certificates to surrender
One per tonne of CO_2e

×

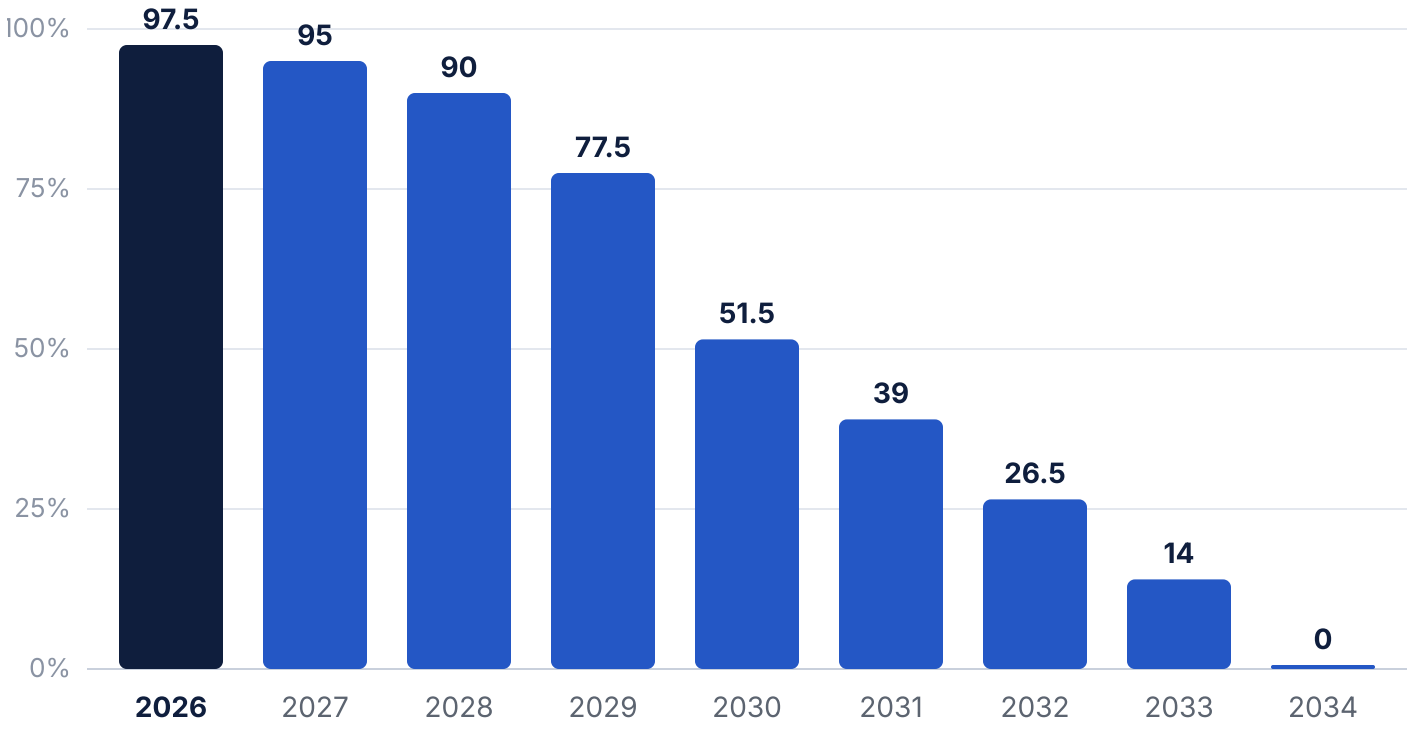
Certificate price
Quarterly average in 2026, weekly from 2027, based on EU ETS auction prices

You control two of these: **which supplier data you use** and **how accurately your customs data records mass and CN code**. The rest is set in Brussels.

Source: EPA CBAM Newsletter, March 2026, section 4(d); Regulation (EU) 2023/956, Articles 7, 9 and 31.

THE RAMP

2026 is the cheapest year CBAM will ever be



CBAM factor: share of the CBAM benchmark still deducted as free allocation (%)

Each year, less of the benchmark is deducted from your embedded emissions. **The same tonnes from the same supplier cost more every year**, even if the carbon price never moves.

By **2030** roughly half the deduction is gone. From **2034** you pay for every tonne of embedded CO_2e.

Source: CBAM factor schedule following the EU ETS free-allocation phase-out (Directive 2003/87/EC, Art. 10a(1a); CBAM Regulation, Art. 31).

ILLUSTRATION, NOT A QUOTE

Same 200 tonnes of steel. The bill depends on the year and on your supplier's data.

IMPORT YEAR	USING DEFAULT VALUES (2.0 T CO_2E/T)	USING VERIFIED SUPPLIER DATA (1.6 T CO_2E/T)
2026	**€10,160** 400 − 273 = 127 certificates	**€3,760** 320 − 273 = 47 certificates
2030	**€20,464** 400 − 144.2 = 255.8 certificates	**€14,064** 320 − 144.2 = 175.8 certificates
2034	**€32,000** 400 certificates, no deduction	**€25,600** 320 certificates, no deduction

Made-up round numbers to show the mechanics. 200 t imported; default 2.0 and verified 1.6 t CO_2e per tonne; CBAM benchmark 1.4 t CO_2e/t; certificate price €80; no carbon price paid abroad. Real default values and benchmarks are set per CN code and production route, and the price moves. Use the EPA's calculation tool for your own figures.

SUPPLIER DATA

Your supplier's emissions data is now a line on your cost sheet

FALLBACK

Default values

Published by the Commission per product and country of origin. No supplier work needed, but they usually cost more than a good supplier's real figure.

USUALLY CHEAPER

Verified actual values

Must be certified by an accredited verifier before use in a declaration. That applies to your **2026 imports**, declared in 2027.

HOW SUPPLIERS SHARE IT

The O3CI portal

Non-EU plants register on the Operators of Third Country Installations portal, upload installation and verified emissions data, and can share a summary with you.

Ask each supplier this month: Which installation made our goods? Are you registered on O3CI? Who is verifying your 2026 emissions, and when will we have the report?

Sources: EPA CBAM Newsletter, March 2026, section 4(c); EPA email to Andrew O' Connor, 27 August 2026.

CERTIFICATES AND CASH

From 2027, CBAM is a cash-flow item every quarter, not once a year

BUYING

Common Central Platform

- Only Authorised CBAM Declarants can buy
- Ireland sells only to declarants established in Ireland
- Buy at any time during the year
- Price published weekly from 2027

HOLDING

The 50% rule

- At the end of each quarter from 2027, hold certificates covering **at least 50%** of the embedded emissions you've imported since 1 January
- Surrender the full amount with the annual declaration by 30 September

Treat it like import VAT: **estimate it, budget it and agree who carries it.** Check your supply contracts and price lists for who pays the carbon cost, and whether it can be passed on.

Source: EPA CBAM Newsletter, March 2026, section 4(e).

STILL MOVING

What isn't settled yet, straight from the EPA

AWAITED

Carbon price paid abroad

The deduction for carbon tax paid in the country of origin can't be applied yet. Asked by Andrew in September, the EPA replied that it is *"still awaiting the secondary legislation for the carbon price paid in a third country."*

PROPOSAL

Downstream extension

About 180 downstream steel and aluminium products, plus anti-circumvention rules, proposed from 1 January 2028. Machinery, fabrications and parts buyers should watch this.

UPDATING

Commission FAQ

The Commission's CBAM FAQ is being revised to reflect the 2025 changes. Check the date on any guidance you rely on.

LAW

UK CBAM, from 1 Jan 2027

A separate UK scheme run by HMRC, with a £50,000 importer threshold. Trading with Great Britain or Northern Ireland? Check both regimes.

Sources: EPA email to Andrew O' Connor, 28 September 2026; EPA CBAM Newsletter, March 2026; European Commission proposal, December 2025; GOV.UK.

YOUR CHECKLIST

Eight things to do before 30 September 2027

BEFORE 31 DECEMBER 2026

1. **Map your CN codes** against Annex I or TARIC, for every non-EU supplier.
2. **Add up your 2026 tonnage** across cement, iron and steel, aluminium and fertilisers.
3. **Confirm your authorisation** and that each declaration carries Y238 or Y128 with the right reference.
4. **Ask suppliers** for installation details, O3CI registration and a verification date.

EARLY 2027

5. **Estimate your liability** with the EPA calculation tool once the Q4 price is out on 4 January.
6. **Plan cash** for buying from 1 February and the quarterly 50% holding rule.
7. **Review contracts and pricing**: who carries the carbon cost, and can it be passed on?
8. **Book the deadline**: declaration and surrender by 30 September 2027.

WHERE TRUO TRADE FITS

CBAM is a data problem first. Keep the evidence with the order.

Truo Trade is the trade operating system for importers and exporters: one shared record for every order, its documents and its shipments. We are building the CBAM evidence trail into that record

IN DEVELOPMENT WITH PARTNERS

ONE RECORD

Every CBAM import, traceable

CN code, origin, net mass, supplier installation and emissions evidence, linked to the order and the customs entry.

NO CHASING

Supplier requests with owners

Requests for installation data, O3CI registration and verification reports, each with an owner, a due date and a reminder.

REVIEW-READY

For your declarant and adviser

Calculation inputs, review decisions and declaration history in one place, ready for whoever signs the declaration.

Truo doesn't decide legal scope or submit declarations. **Your authorised declarant does**, with expert support from advisers such as Customs Accounting Services.

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Questions?

Bring your CN codes, your 2026 tonnage and your supplier list.
Those three answer most CBAM questions.

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Managing Director, Customs Accounting Services
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truotrade.com/cbam
These slides, with sources

General information, not legal, tax or customs advice. CBAM rules, dates and prices change; check current requirements with the EPA, Revenue and the European Commission before acting.
Sources: Regulation (EU) 2023/956 as amended; S.I. No. 539/2024; EPA CBAM Newsletter (March 2026); EPA correspondence with Andrew O' Connor (27 Aug and 28 Sep 2026).