



EU Carbon Border Adjustment Mechanism (CBAM) - Definitive Regime Entering into Force on 01/01/2026

Risk of falling behind / opportunity for low-carbon repositioning (TTA)



STRATEGIC SIGNAL

Since January 1, 2026, the CBAM has entered its definitive phase. EU importers (or customs representatives) are urged to obtain "authorized CBAM declarant" status and register in the authorization system. As of January 7, 2026, the European Commission reported over 12,000 authorization requests and more than 4,100 statuses granted, with 10,483 customs declarations validated during the first week of January.

HIGHLIGHTS

CBAM acts as a new "access control" to the EU market; compliance has become a competitiveness criterion as critical as price or lead times.

Current Scope: The mechanism currently covers 6 key sectors: Cement, Aluminum, Fertilizers, Iron & Steel, Hydrogen, and Electricity.

STRATEGIC ANALYSIS: PROBABLE IMPACTS

A) Export Industry

- Compliance pressure is mounting on upstream suppliers. Even though the automotive sector is not a "CBAM sector" per se, its inputs (such as steel, aluminum, and electricity) fall within the scope.
- There is a risk of "commercial discount," where EU buyers may integrate CBAM costs or risks into prices or demand strict decarbonization plans.

B) Logistics & Ports

- A "green logistics" ripple effect is emerging. Ports and logistics operators can gain market share by offering services that facilitate compliance (traceability, data reporting, and low-carbon energy).

C) Foreign Direct Investment (FDI)

- There is an opportunity to attract "low-carbon" industrial projects close to the EU. However, this is contingent on avoiding opportunistic relocations that lack local skill development in carbon data management.

STRATEGIC ANALYSIS: POINTS OF VIGILANCE

- SME Exclusion:** Smaller companies risk falling behind due to a lack of "carbon data" skills and tools, leading to a loss of supplier status and progressive exclusion from export chains.
- Territorial Reputation:** A perception of being "non-compliant or unprepared" could hinder FDI and regional competitiveness.
- Social and Employment Risks:** If subcontracting SMEs lose EU orders, it could lead to reduced activity, hiring freezes, or job losses in specific industrial segments.
- Corporate Inequality:** A growing gap between large structures capable of investing (in data, audits, and energy) and fragile SMEs poses a risk to the local economic fabric.
- Support Fragmentation:** Dispersed assistance mechanisms and a lack of regional coordination lead to low uptake of available support programs.

STRATEGIC RECOMMENDATIONS

- Secure Market Access:** Map exposed sectors and flows (direct CBAM + inputs) and prioritize links at risk of falling behind.
- Strengthen MRV Capacity:** Build a local core of expertise in Measurement, Reporting, and Verification, and structure a support offer (consulting, audit, tools) tailored for SMEs.
- Position a Low-Carbon Industry-Logistics Corridor:** Integrate carbon compliance, energy efficiency, and traceability into the regional value proposition to capture FDI and EU contracts.
- Prevent Social Risk:** Anticipate employment impacts through targeted training, skill transition support, and monitoring social signals in exposed SMEs.
- Deploy a "Carbon Skills" Plan:** Launch short-term training programs (MRV, reporting, data, energy efficiency) to secure employment and industrial upgrading.
- Establish a "CBAM TTA" Task Force:** Form a leadership committee involving institutional and economic stakeholders (CRI, CCIS, CRTTA, etc.) to pilot anticipation and coordinate support.

Sources :

European Commission – CBAM (definitive regime 2026 + "authorized CBAM declarant" authorization); effective date: 01/01/2026.