



# The Core of CBAM: Key Sectors and Materials Affected

The Carbon Border Adjustment Mechanism (CBAM) is a cornerstone of the European Union's ambitious climate strategy, designed to address carbon emissions beyond its borders. While its objectives of preventing carbon leakage and encouraging global decarbonization are widely recognized, stakeholders must understand the specific sectors, materials, and mechanisms affected. This article delves into the key sectors targeted by CBAM, the role of CN codes in its implementation, the significance of precursors and embedded emissions, and the potential future expansion of the mechanism. Additionally, it explores the challenges and opportunities presented by CBAM, offering insights into its broader implications for global trade and climate action.

## Key Sectors Covered

CBAM targets industries with the highest greenhouse gas (GHG) emissions, ensuring that the mechanism has a significant impact on global decarbonization efforts. These sectors include:

- **Steel:** A cornerstone of global infrastructure, steel production is highly carbon-intensive, contributing approximately 7-9% of global CO<sup>2</sup> emissions. The sector's reliance on coal-based blast furnaces makes it a primary focus of CBAM. For example, producing one ton of steel typically emits 1.8 to 2.2 tons of CO<sup>2</sup>, depending on the production method. Transitioning to electric arc furnaces (EAFs) powered by renewable energy could reduce emissions by up to 75%, but this requires significant investment and infrastructure upgrades.

- **Cement:** Essential in construction, cement production accounts for around 8% of global CO<sup>2</sup> emissions. The chemical process of calcination, combined with energy-intensive kiln operations, makes this sector a key target. For instance, producing one ton of cement emits approximately 0.8 to 1 ton of CO<sup>2</sup>. Innovations like carbon capture and storage (CCS) and the use of alternative raw materials (e.g., fly ash or slag) are critical for reducing emissions in this sector.





producing one ton of ammonia emits approximately 1.6 to 2 tons of CO<sup>2</sup>. Green ammonia, produced using renewable energy, is emerging as a sustainable alternative but remains costly and underdeveloped.

- **Electricity:** While not a physical good, electricity generation is a major contributor to GHG emissions, particularly in regions dependent on coal or natural gas. CBAM's inclusion of electricity underscores the EU's commitment to addressing indirect emissions. For example, electricity generated from coal emits around 1 ton of CO<sup>2</sup> per MWh, compared to less than 0.05 tons for wind or solar power.

- **Hydrogen:** Emerging as a clean energy solution, hydrogen production is still largely reliant on carbon-intensive methods like steam methane reforming. CBAM aims to incentivize the adoption of green hydrogen produced via renewable energy. For instance, gray hydrogen (produced from natural gas) emits 9-10 tons of CO<sup>2</sup> per ton of hydrogen, while green hydrogen emits zero CO<sup>2</sup> when produced using renewable energy.

## Role of CN Codes in CBAM

The CBAM regulation relies on the precise identification of products using 8-digit CN codes (Combined Nomenclature). These codes specify the exact category of imported goods, ensuring accuracy in calculating embedded emissions. For instance:

- **7208 51 00:** Covers flat-rolled products of iron or non-alloy steel, of a width of 600 mm or more, hot-rolled, not clad, plated, or coated.

- **2814 10 00:** Includes anhydrous ammonia, widely used in fertilizer production.

Importers must align these codes with the regulations to determine the emissions reporting requirements and CBAM certificate obligations. The use of CN codes ensures that the mechanism is applied consistently and transparently, reducing the risk of misclassification or evasion. For example, a company importing steel products into the EU must identify the correct CN code for its goods and provide detailed emissions data for each stage of production. This includes emissions from raw material extraction, transportation, and processing. Failure to comply with these requirements can result in penalties or the denial of market access.

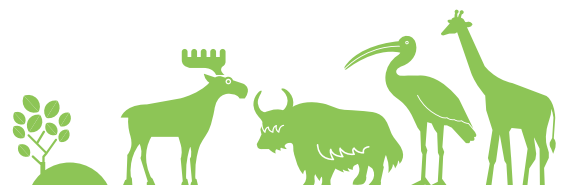
## Role of Precursors and Embedded Emissions

Precursors are raw materials used in the production of finished goods and play a critical role in CBAM calculations. The emissions embedded in precursors, such as iron ore used in steel production or alumina in aluminum manufacturing, directly impact the final emissions footprint of imported goods. Accurate data collection on these emissions is essential for complying with CBAM and demonstrates the interconnected nature of global supply chains.

For example, the production of steel involves multiple stages, each contributing to the overall carbon footprint. Iron ore must be mined, transported, and processed into pig iron

- **Aluminum:** Widely used in automotive and construction sectors, aluminum production is energy-intensive, particularly during the electrolysis process. The carbon footprint of aluminum varies significantly depending on the energy source used. For example, aluminum produced using coal-based electricity can emit up to 20 tons of CO<sup>2</sup> per ton of aluminum, while hydroelectric-powered production emits less than 4 tons.

- **Fertilizers:** A vital component of agriculture, fertilizer production emits GHGs through processes like ammonia synthesis and nitric acid production. These emissions make the sector a priority for CBAM. For instance,



before being converted into steel. Each of these stages emits CO<sup>2</sup>, and CBAM requires importers to account for these emissions comprehensively. Similarly, in the aluminum sector, the extraction of bauxite, its refinement into alumina, and the subsequent electrolysis process all contribute to the product's embedded emissions.

## Future Expansion of CBAM

While CBAM's initial scope is focused on high-carbon sectors, discussions are ongoing about its potential expansion to other industries. Sectors like chemicals, plastics, and automotive components are rumored to be under consideration, though no concrete plans have been announced. Such an expansion would further solidify CBAM's role in driving decarbonization across the economy.

For instance, the chemicals sector is highly diverse, with some processes being significantly more carbon-intensive than others. The production of ethylene, a key chemical used in plastics, emits approximately 1.5 to 2 tons of CO<sup>2</sup> per ton of product. Expanding CBAM to include such chemicals would require developing new methodologies for calculating embedded emissions and addressing potential trade disputes.

Similarly, the plastics industry faces challenges related to recycling and the use of fossil fuel-based feedstocks. Including plastics under CBAM could incentivize the adoption of circular economy practices and bio-based alternatives. However, this would require significant investment in recycling infrastructure and innovation.

## Challenges and Opportunities

### Challenges:

- **Emissions Reporting:** Importers must adapt to rigorous emissions reporting requirements, which involve collecting data from multiple stages of the supply chain. This process can be complex and resource-intensive, particularly for companies with limited experience in carbon accounting.

- **Supply Chain Transparency:** Ensuring transparency across global supply chains is a significant challenge, especially when dealing with upstream producers in regions with less stringent environmental regulations.

- **Financial Impact:** The cost of CBAM certificates could pose a financial burden on importers, particularly those dealing with highly carbon-intensive goods. This could lead to increased prices for end consumers and potential trade disruptions.

- **Precursor Emissions:** Accurately calculating emissions from precursors adds another layer of complexity to compliance efforts, requiring detailed knowledge of production processes and supply chain dynamics.

### Opportunities:

- **Competitive Advantage:** Companies investing in cleaner technologies and sustainable practices will gain a competitive edge, as their products will likely incur lower CBAM costs.

- **Market Differentiation:** Businesses that proactively reduce their carbon footprint can differentiate themselves in the market, appealing to environmentally conscious consumers and investors.

- **Innovation Incentives:** CBAM creates incentives for innovation in low-carbon technologies, driving research and development in areas like green steel, carbon capture and storage, and renewable energy.

- **Global Leadership:** By aligning with CBAM, companies can position themselves as leaders in the global transition to a low-carbon economy, enhancing their reputation and influence.

## Case Study: The Steel Industry

The steel industry provides a compelling example of CBAM's potential impact. A European steel importer sourcing products from a coal-dependent country like India or China could face significant CBAM costs due to the high carbon intensity of production. However, by partnering with suppliers that use electric arc furnaces (EAFs) powered by renewable energy, the importer could reduce its CBAM liabilities and gain a competitive advantage. For instance, a Swedish steel producer, SSAB, has already transitioned to green steel production using hydrogen instead of coal. This innovation not only reduces emissions but also positions the company as a leader in sustainable steel production, attracting environmentally conscious customers.

## Key Takeaway

The correct understanding of the industries and materials under CBAM is vital for complying with its requirements and implications. The sectors were chosen for their significant contributions to global emissions and their potential to benefit from decarbonization incentives. By targeting these key areas, CBAM ensures its strategic and effective impact.



## Conclusion

CBAM is initially focused on emissions-intensive sectors, such as steel, cement, and aluminum, to achieve impactful results in a relatively short timeframe. This targeted approach ensures that the mechanism addresses industries with the highest carbon emissions, aligning with the EU's urgent decarbonization goals. The system's design is exact, with detailed requirements for calculating embedded emissions and aligning carbon pricing with the EU ETS. However, the transitional period has highlighted the complexity of data collection, particularly in tracking emissions across global supply chains and obtaining accurate data from upstream producers. This phase underscores the challenges businesses face but also provides an opportunity to refine methodologies and improve transparency as CBAM progresses. As the mechanism evolves, its potential expansion to other sectors and its influence on global trade dynamics will be closely watched. By addressing the challenges and seizing the opportunities presented by CBAM, businesses can not only ensure compliance but also contribute to the broader goal of achieving a sustainable, low-carbon future. ■

