

January 2026

Latest updates for Carbon Border Adjustment Mechanism (CBAM) Definitive Period

On 30 December 2025, the Independent Authority of Public Revenues (“IAPR”) published guidelines on the implementation of import customs procedures CBAM goods. This followed the adoption by the European Commission, in December 2025, of several Implementing and Delegated Acts that clarify and streamline the rules applicable to the definitive phase.

Key guidelines by Greek authorities

Among other points, the Greek authorities highlighted the following:

Authorised CBAM Declarant status

From 1 January 2026, CBAM goods may be released for free circulation only by an Authorised CBAM Declarant, or by an importer or indirect customs representative who has submitted a relevant application by 31 March 2026. To be noted that a de minimis exemption of 50 tonnes applies.

Import declaration adjustments

For the release for free circulation of CBAM goods, specific codes must be included in the import customs declaration to enable successful customs clearance.

Completion of CBAM declarations in special cases

Additional clarifications are provided on completing CBAM declarations for processed goods (inward processing/outward processing) and for returned goods.

Additional key changes communicated by the EU Commission in December 2025

What' next?

Price of CBAM certificates

From 1 February 2027, Authorised CBAM Declarants will purchase CBAM certificates via a central European Commission platform at a price linked to the EU ETS auction price, using a quarterly average for 2026 and a weekly average from 2027 onwards.

At the end of December 2025, the European Commission adopted a package of legal acts relevant to CBAM, addressing, among others, the following areas:

- updates to the emissions calculation methodology
- revised CBAM default values
- enhancements to the CBAM Registry, including the possibility to delegate the filing of CBAM declarations to third parties
- rules on customs communications and the transmission of import data to the Commission
- principles governing emissions verification.

Beginning in January 2028, amendments to the CBAM Regulation are examined focusing on the below fields:

Downstream scope expansion: extending coverage to downstream products with high steel and aluminum content, such as industrial machinery, vehicles, and metal components.

Anti-circumvention measures: introducing additional mechanisms to prevent evasion of CBAM obligations, including stricter reporting obligations, enhanced traceability and the use of default values in high-risk cases.

Clarifications for electricity: refining the calculation of embedded emissions in imported electricity and allowing more flexible use of actual emissions data.

In addition, a **Temporary Decarbonisation Fund** has been proposed to provide targeted financial support to energy-intensive EU industries, covering production years 2026 and 2027.

Let's talk

For a more in-depth discussion on the above you may contact:

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