

CBAM Declarant Licensing Procedure

The Carbon Border Adjustment Mechanism (CBAM) will apply in its definitive regime from 1/1/2026, aiming to reduce greenhouse gas emissions embedded in imported carbon-intensive products (iron, steel, cement, aluminum, fertilizers, electricity, hydrogen). From this date, only licensed CBAM declarants will be able to import these products into the EU.

Basic Information

A. Who is Affected – Licensing Obligation

The obligation applies to:

- All importers of products falling under CBAM who are established in Greece.
- Indirect customs representatives acting on behalf of importers outside the EU.

The application for authorized declarant status must be submitted within 2025, before the first import of CBAM products in 2026.

B. Procedure and deadlines

- **Electronic Submission of Application:** The application is submitted exclusively through the European Commission's CBAM Registry. Along with the application, in addition to the company's details, the following must also be submitted:
 - An estimate of the annual imports of CBAM goods for the current and the following year
 - Supporting documents and information proving:
 - **Financial capacity** of the company to fulfill the financial obligations associated with the CBAM.
 - **Operational capacity** of the company in relation to the CBAM. The company must have adequate operational organization and relevant procedures for the prevention, detection, and correction of errors in CBAM declarations and the management of CBAM certificates.
 - **Regulatory compliance** for the managers/legal representatives, beneficial owners, and any person responsible for or exercising control over the management of the applicant company, including the person responsible for CBAM matters.
- **Deadlines:** The National Authority reviews applications within 120 days (with the possibility of extension up to 180 days if additional information is requested).
- **Exemptions:** A special exemption applies for importers of electricity.

Key Points

Important Notes

- The license is required before the import of CBAM products from 1/1/2026.
- All supporting documents must be retained for 5 years.
- In case of changes (merger, change of legal form, cessation or modification of imports), the National Authority must be informed within 30 days.
- It is advisable to ensure that the application is prepared and submitted promptly within the year 2025. While there is currently a proposal under consideration that would introduce a quantitative exemption threshold of 50 tons per year for imported CBAM goods, it is important to note that this exemption has not yet been enacted. Furthermore, there is no definitive information regarding the timeline for its potential implementation or the specific terms and conditions under which it may be applied.

Lets talk

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

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