

CBAM Readiness Snapshot

A practical pre-consultation worksheet for EU market access, embedded emissions data, and compliance risk.

Use this to identify what is known, what is uncertain, and where ECG can help.

How to use this worksheet

Don't expect to have every answer. Unchecked items are useful discussion points for a readiness review, data-gap assessment, supplier-data workflow, or cost-risk model.

Initial CBAM Sectors to Screen

Cement • Iron & steel • Aluminium • Fertilisers • Electricity • Hydrogen

1. Product scope

- Covered product categories or CN/HS codes are known or can be listed.
- Approximate annual EU import quantities are available.
- High-volume or high-value product lines are identifiable.

ECG helps: screen products, map scope, and prioritize high-risk trade flows.

2. Trade flow & responsibility

- EU importer, indirect customs representative, or customer role is understood.
- Countries of origin and production sites/installations are known.
- Customs, broker, or shipment records can be accessed if needed.

ECG helps: clarify reporting roles and build a practical data-request map.

3. Embedded emissions baseline

- Direct process/fuel emissions data exists or can be requested.
- Electricity use and relevant indirect emissions information are documented.
- Actual data, estimates, and default values are clearly distinguished.

ECG helps: develop or review CBAM-aligned emissions calculations and assumptions.

4. Supplier data & LCA evidence

- Supplier data owners are identified for covered products.
- Production route, process, and material information can be documented.
- Calculation files, units, factors, and evidence can be retained.

ECG helps: design supplier-data templates and strengthen lifecycle evidence.

5. Reporting & verification readiness

- An internal owner exists for CBAM records, deadlines, and submissions.
- Required data fields can be mapped to reporting workflows.
- Records are organized for review, correction, and verification.

ECG helps: prepare reporting workflows, audit trails, and verification readiness.

6. Cost and commercial risk

- Likely CBAM certificate exposure can be estimated by product or supplier.
- Carbon price paid abroad, where applicable, can be documented.
- Sourcing, customer pricing, and contract risks have been reviewed.

ECG helps: model scenarios and translate CBAM exposure into procurement strategy.

Recommended next step

Bring this snapshot to a short readiness call. The most useful outcome is not a perfect checklist; it is a clear map of product scope, data gaps, reporting roles, and the highest-priority actions.

* Reference note: Based on publicly available European Commission CBAM guidance and registry/reporting materials. This worksheet is for readiness planning only and is not legal, customs, tax, or verification advice.