

CBAM COST CHECK

What CBAM will cost your 2026 steel imports, line by line

5 product lines · 26,000 t · CBAM factor 97.5% · default mark-up 10%

PREPARED FOR

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REPORT DATE

15 October 2026

REFERENCE

LHR-CBAM-26-0147

Est. CBAM cost 2026	Certificates	Average per tonne	Additional saving with actuals
€3,192,205	38,778	€122.78	€1,050,733
at €82.32 per certificate	t CO2e to surrender	across 26,000 t	on 3 default lines; excludes lines already on actuals

Certificate price range (current position, 2026)

Low (base -10%) €74.09/t CO2e: €2,873,062

Base (official Q3 2026 price) €82.32/t CO2e: €3,192,205

High (base +10%) €90.55/t CO2e: €3,511,348

Rule: Low and High are the official base price +/- 10% (a symmetric sensitivity band, not a forecast; see method, page 4).

Validity. This estimate reflects the rules, default values, benchmarks and certificate price stated in this report as of 15 October 2026. Refresh it when the Commission publishes a new certificate price, when default values are revised, or if volumes or suppliers change by more than 10%.

01 · EXPOSURE

Your product lines

#	CN CODE	PRODUCT	ORIGIN	TONNES	BASIS	tCO2e/t	BENCH.	SUPPLIER DATA	CERTS	COST	€/T
1	7208 39 00	Hot-rolled coil (HRC)...	India	6,000	Default	4.708	1.37	Pending verification	20,234	€1,665,663	€278
2	7208 38 00	Hot-rolled coil (HRC)...	Türkiye	8,000	Actual	0.620	0.07	Verified	4,398	€362,043	€45
3	7208 37 00	Hot-rolled coil (HRC)...	Viet Nam	4,000	Default	2.585	1.37	Not requested	4,997	€411,353	€103
4	7214 20 00	Rebar, DRI/EAF	Egypt	5,000	Actual	1.050	0.48	Verified	2,934	€241,527	€48
5	7210 70 80	Coated coil, BF/BOF	China	3,000	Default	3.526	1.49	Pending verification	6,215	€511,619	€171
Total				26,000					38,778	€3,192,205	€123

tCO2e/t is the embedded emissions applied: for default-basis lines the entered default value × (1 + 10% mark-up); for actual-basis lines the supplier value. Certificates = max(0, applied emissions – CBAM factor × benchmark) × tonnes, rounded per line. Cost = certificates × €82.32.

02 · SAVINGS

Savings with verified supplier data

What each line would cost on the official default value (plus the 2026 mark-up of 10%) against the supplier's actual emissions, at the base price of €82.32 per certificate (2026). A line with no actual figure shows no saving.

LINE	BASIS	DEFAULT €/T	ACTUAL €/T	SAVING €/T	SAVING VS DEFAULTS	STATUS
1 · India Hot-rolled coil (HRC), BF/BOF	Default	€277.61	€169.94	€108	€646,047	Additional potential
2 · Türkiye Hot-rolled coil (HRC), scrap/EAF	Actual	€109.90	€45.26	€65	€517,135	Already reflected in base case
3 · Viet Nam Hot-rolled coil (HRC), BF/BOF	Default	€102.84	€58.80	€44	€176,165	Additional potential
4 · Egypt Rebar, DRI/EAF	Actual	€252.38	€48.31	€204	€1,020,356	Already reflected in base case
5 · China Coated coil, BF/BOF	Default	€170.54	€94.37	€76	€228,521	Additional potential

Already reflected in base case (lines on Actual basis) €1,537,491

Additional potential (lines on Default basis): the headline saving €1,050,733

Total vs all-defaults (the two subtotals above) €2,588,224

The headline additional saving (€1,050,733) excludes the lines already reflected in your base case; do not add line figures together across the two statuses.

Line figures are whole euros; each subtotal is the sum of its lines. The additional potential assumes the supplier's actual figures are verified and accepted; for lines 1, 3 and 5 the actual figures in this sample are ILLUSTRATIVE, not real supplier data.

03 · SCENARIOS

Price and data scenarios

Total CBAM cost (€) by certificate price case and import year. Same volumes in every row; the next year changes only the CBAM factor, the default mark-up and the benchmark for that year.

YEAR	CASE	€/T CO2E	ALL DEFAULTS	CURRENT POSITION	ALL ACTUALS	ADDITIONAL SAVING VS CURRENT POSITION
2026	Low	€74.09	€4,256,841	€2,873,062	€1,927,378	€945,684
2026	Base	€82.32	€4,729,696	€3,192,205	€2,141,472	€1,050,733
2026	High	€90.55	€5,202,550	€3,511,348	€2,355,567	€1,155,781
2027	Low	€74.09	€4,946,546	€3,243,438	€1,966,570	€1,276,868
2027	Base	€82.32	€5,496,012	€3,603,722	€2,185,019	€1,418,703
2027	High	€90.55	€6,045,480	€3,964,008	€2,403,469	€1,560,539

All defaults: every line on the official default value plus mark-up. Current position: your lines as priced on page 2. All actuals: every line with an actual figure on that figure (lines without one stay as in the current position). Additional saving vs current position = current position – all actuals.

Low, Base and High are the official €82.32 price +/- 10%; 2027 holds the same prices (no 2027 price is published).

Sample report · illustrative figures.

04 · METHOD

Methodology, assumptions and disclaimer

Scope. Import year 2026; 5 product lines totalling 26,000 tonnes, as provided by the client.

Embedded emissions. Lines marked Default use the official EU default value (total emissions) for the CN code and origin country, increased by the mark-up for the import year (10%). Lines marked Actual use specific embedded emissions reported by the supplier installation, without mark-up.

Free-allocation adjustment. Deducted per tonne = default CBAM benchmark (Column B) for the CN code and production route (for default-value lines, the route set in the default-value table) × CBAM factor (97.5% for 2026).

Certificates and cost. Certificates per line = $\max(0, \text{emissions} - \text{adjustment}) \times \text{tonnes}$, rounded to whole certificates; cost = certificates × the certificate price of €82.32 per tonne CO₂e, with a low/high range shown on page 1 and in the scenario table.

Data status. A line counts as Actual basis only when an actual emissions figure is entered and the supplier data is marked Verified. Figures on lines marked Pending verification or Not requested are not yet usable as actuals; those lines are priced on defaults until verified data is received, and the figure only drives the additional-saving potential.

Savings. For every line with an actual figure, saving = cost on the official default value (plus mark-up, default-route benchmark) – cost on the actual figure (chosen-route benchmark), both at the same certificate price and whole euros. Lines on Actual basis are Already reflected in base case; lines on Default basis are Additional potential. Subtotals are sums of the lines by status, so the headline additional saving never includes already-reflected lines; do not add line figures together across the two statuses. Where the origin country has no default value for the CN code, the "Other countries and territories" value is used.

Price range. Low and High = the official base price –/+ 10% (symmetric; the band is at least 10% and is widened only if an official quarterly price moved more than that from one quarter to the next). Observed: official prices Q1 2026 €75.36, Q2 2026 €75.28, Q3 2026 €82.32; largest quarterly move +9.35% (Q2 2026 to Q3 2026). It is a sensitivity band, not a forecast; no market data or forecasts are used.

Disclaimer. This report is an estimate based on the inputs supplied and on public rules and prices as stated. It is not legal, tax or customs advice. CBAM rules, default values, benchmarks and certificate prices change; confirm figures with the primary sources and your customs representative before acting. Loharo accepts no liability for decisions taken on the basis of this estimate.

Sources

CBAM certificate price: European Commission quarterly price (Q1 2026 €75.36, Q2 €75.28, Q3 €82.32; Q4 due 4 Jan 2027). Low and High = base price –/+ 10% (documented assumption, see Assumptions).

CBAM factor: Regulation (EU) 2023/956 Art. 31 / Directive 2003/87/EC Art. 10a(1a) (97.5% in 2026, 95% in 2027).

Default-value mark-up: Implementing Regulation (EU) 2025/2621 as corrected by (EU) 2026/1740 (10% 2026, 20% 2027, 30% from 2028).

Default values: Implementing Regulation (EU) 2025/2621 Annex I as corrected by (EU) 2026/1740, total emissions, per country and CN code (Commission file version 2, 6 Aug 2026).

Benchmarks: Implementing Regulation (EU) 2025/2620 Annex point 5, Column B (default CBAM benchmarks) per CN code and production route.

Price used: €82.32 (Q3 2026 price, published 2026-10-05).

Assumptions

ASSUMPTION: the central price is the latest published quarterly price on or before the report date; it is not a forecast of later quarters or of the 2027+ weekly price.

ASSUMPTION: Low and High are the base price minus and plus a symmetric band of 10% (the band is widened only if an official quarterly price moved by more than 10% from one quarter to the next). It is a sensitivity band around the official price, not a forecast, and uses no market data. The observed official quarterly moves are shown on the method page.

ASSUMPTION: the next-year scenarios hold volumes and the Low/Base/High certificate prices at the report-year values (no later price is published); only the CBAM factor, the default mark-up and the benchmark for that year change.

ASSUMPTION: where the origin country has no default value for the CN code, the "Other countries and territories" value is used.

ASSUMPTION: a line counts as Actual basis only when an actual emissions figure is entered and the supplier-data status is Verified. An actual figure on any other line is treated as a potential saving that assumes the figure will be verified and accepted; lines without an actual figure show no saving.

Sample report · illustrative figures.