CBAM Supplier Data Pack - CN 7318 Fasteners

What a fastener supplier must be able to answer, and what data your EU importer needs in order to file a CBAM declaration.

> Legal position: CN 7318 (screws, bolts, nuts, washers) is listed in Annex I of Regulation (EU) 2023/956. It has been in scope since 1 October 2023 and financial obligations began on 1 January 2026. No further amendment is required for fasteners to be covered.

1. Who has to do what

Role	Obligation
EU importer (Authorised CBAM Declarant)	Holds ACD status, declares embedded emissions, purchases and surrenders certificates. Without ACD status goods can be stopped at customs.
Non-EU producer / supplier (us)	Supplies accurate process and energy data for the goods, and information on precursors such as wire rod. No legal filing obligation.
Accredited verifier	Appointed by the importer to verify declared data from 2027 onward.

2. Timeline

Date	What happens
1 Oct 2023 - 31 Dec 2025	Transitional phase - quarterly reporting, no payment
1 Jan 2026	Definitive regime starts; financial obligations apply
1 Feb 2027	CBAM certificates become available for purchase (covering 2026 imports)
30 Sep 2027	First annual CBAM declaration due, for goods imported during 2026
2028 onwards	Phased alignment with EU ETS free allocation phase-out; certificate share rises
From 1 Jan 2028 (proposed)	Extension to further downstream steel categories (e.g. CN 7317 nails, 7312 rope, 7320 springs). CN 7318 unaffected - already in scope.

3. The exemption and the penalty for guessing

- Small consignment exemption: importers bringing in 50 tonnes or less of CBAM goods per calendar year in total are exempt from authorisation and certificate surrender. The threshold is assessed at importer level across all CBAM goods combined.
- Default values may be used without supplier data, but carry a mark-up: +10% (2026), +20% (2027), +30% (2028). Certified actual data removes the mark-up.
- For iron and steel the chargeable boundary is direct emissions only; purchased electricity is not currently charged into the certificate obligation for steel.
- CBAM follows the origin of the goods, not the seller. Buying Chinese fasteners through a third-country distributor does not move the obligation.

4. Data we collect from the producing mill

Data field	Unit	Why it is needed
Goods description and CN code	text	Identifies the covered good and the correct Annex I entry
Production route	text	Cold heading, hot forging, heat treatment, coating - drives the emissions calculation
Wire rod origin, supplier, CN 7213	text	Precursor identification; precursor emissions usually dominate the total
Rod mass consumed per tonne of fasteners	t/t	Mass balance and yield
Electricity consumption, production processes	MWh	Main direct emissions input at the forming and heat treatment stage
Fuel consumption (gas, LPG, diesel)	Nm3 / kg	Direct emissions from heat treatment and galvanizing
Galvanizing subcontractor data	MWh, kg	Coating stage is energy intensive and often subcontracted - data must be requested from the galvanizer
Production period covered	dates	Determines which monitoring period the values belong to
Scrap and rework rate	t/t	Affects the mass balance
Grid emission factor used	tCO2/MWh	Convert electricity to emissions; must be documented

5. What to send your declarant

- A product identification sheet per CN code, with mass and route
- The energy and process data table above, with the source of each figure (meter reading, invoice, mill record)
- The wire rod supplier's own emissions or energy data, where available
- A plain-language note stating what was measured, by whom, when, and what is estimated
- Contact for follow-up questions from your verifier

> We do not file declarations, we are not a verifier, and we do not sell certificates. Our role is to make sure your verifier receives real numbers rather than default values - and to tell you plainly when a figure is an estimate instead of a measurement.

6. Questions EU buyers are asking fastener suppliers in 2026

Question	A supplier who can answer	A supplier who cannot
Is CN 7318 in CBAM scope?	Yes - since 1 October 2023	"CBAM is not relevant to fasteners"
Which CN code will you declare?	Confirms the code per product family, and why	Leaves it to the broker
Do you have mill energy data?	Supplies MWh, fuel and mass per tonne	"We can provide default values"
Who is your wire rod supplier?	Names the mill and provides precursor data	Treats the steel as anonymous
What happens if we exceed 50 t?	Explains ACD status and certificate timing	Has not heard of the threshold

7. Action list for the supplier side

- Confirm the CN code for every fastener family you sell into the EU, in writing
- Ask each producing mill for electricity, fuel, output mass and production period - and for the galvanizer separately
- Record which figures are metered and which are estimated, and state the method
- Build one standard data sheet per product family so the same information is sent to every EU customer
- Store the data set per year - a 2026 declaration needs 2026 data, not last year's average
- Review the 2028 expansion proposal if you also supply nails, rope, cable or springs

> Getting ahead of this is a commercial advantage, not paperwork. A supplier who can hand a verifier-ready data set is worth more to an EU importer than one who is 3% cheaper and cannot answer the question.