



Uniting Europe's Energy, Today

# CBAM and market coupling

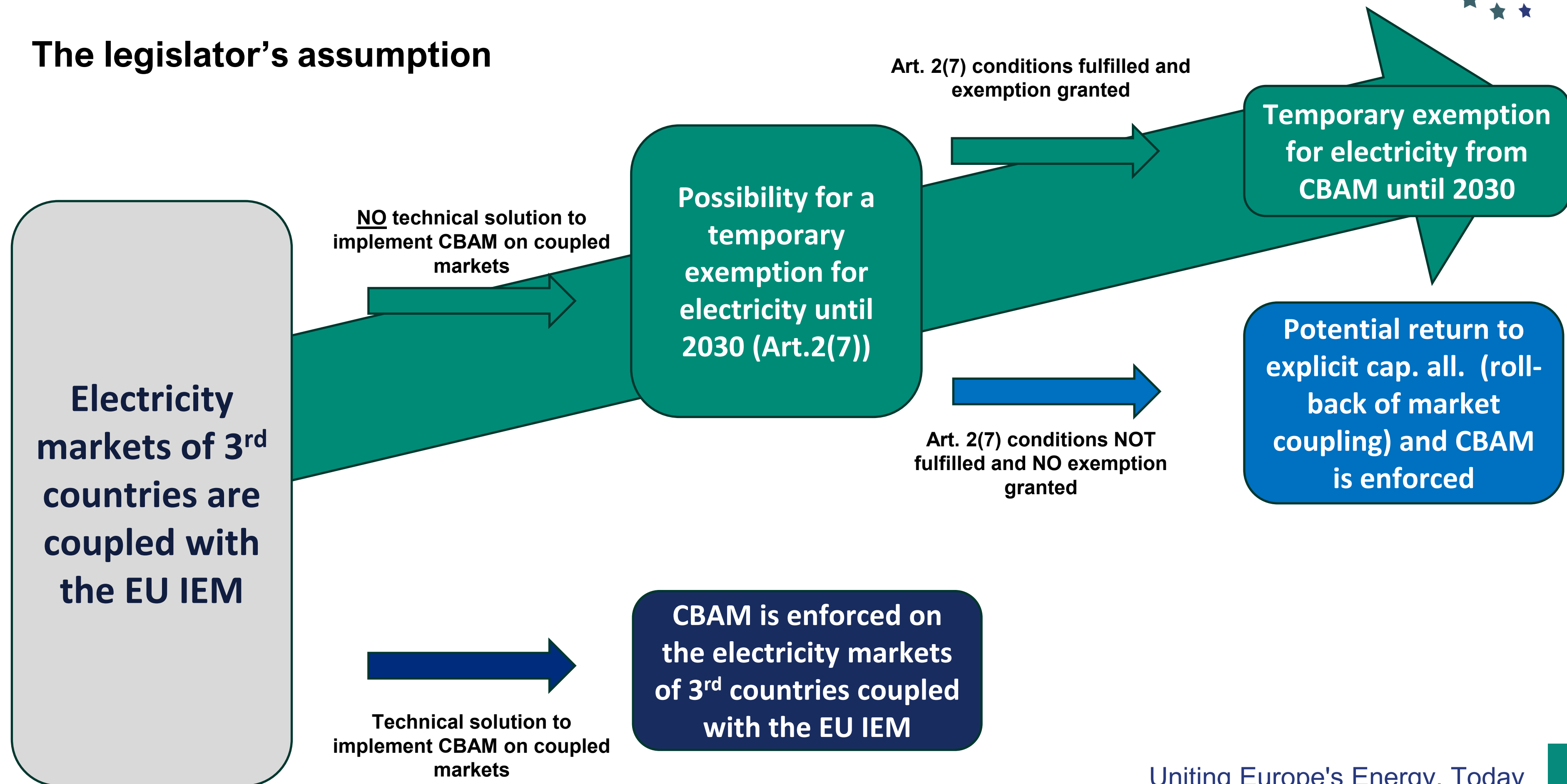
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# The dynamics between CBAM and market coupling

## The legislator's assumption



# The dynamics between CBAM and market coupling

## The reality

January 2026

CBAM is  
enforced on the  
electricity  
markets of  
Contracting  
Parties

Work on SDAC with  
CPs continues

Q1 2027 (tbc)

Electricity  
markets of  
Contracting  
Parties are  
ready to be  
coupled with  
the EU IEM  
(SDAC go live)

NO technical solution to  
implement CBAM on coupled  
markets

Art. 2(7) conditions  
fulfilled and exemption  
granted

**Must be the same time  
as the coupling**

Temporary exemption  
for electricity from  
CBAM until 2030, SDAC  
completed

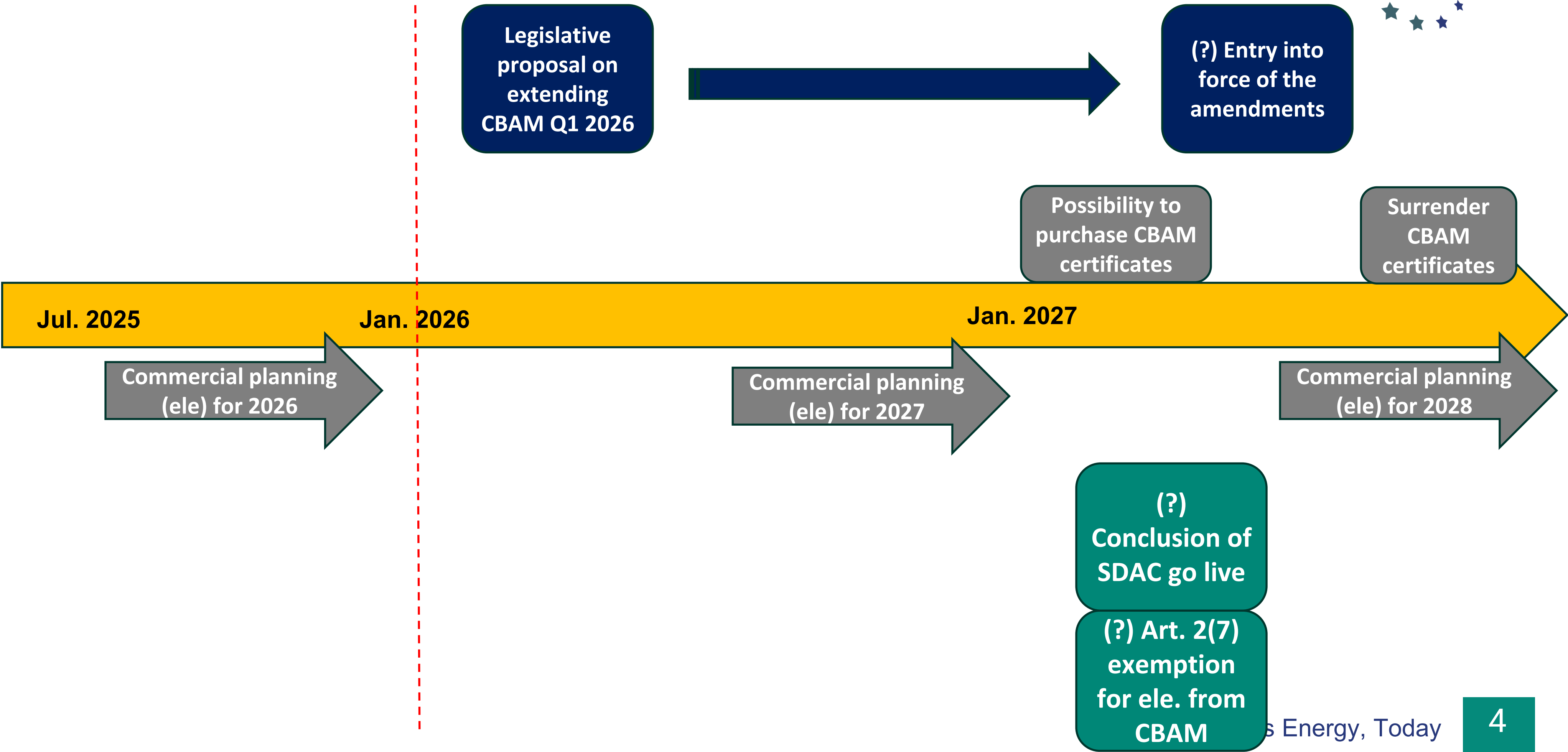
Art. 2(7) conditions NOT  
fulfilled and NO  
exemption granted

Potential NO  
completion of SDAC  
and CBAM is enforced

Technical solution to  
implement CBAM on coupled  
markets

CBAM is enforced on  
the electricity markets  
of 3<sup>rd</sup> countries coupled  
with the EU IEM

# Potential timeline



- **Sequence of developments in reality turned out different from the scenario described in the CBAM Regulation;**
- **With the current rules, market coupling – SDAC(?) – must be completed at the same time as an exemption from Art. 2(7) is granted ⇒ if there is political aim for Art. 2(7) compliance, the preparations must start asap;**
- **Based on current rules, there will be a period when CBAM will apply to electricity in its current form – the structural review process of the CBAM Regulation might result in legal changes not earlier than 2027 ⇒ first impact of the changes might come only in 2028 (unless exemption is secured in the meantime);**



# THANK YOU!



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