

*September 18th, 2023*

The Latin American Steel Association (ALACERO), as representative of the industry and its value chain, express its concern regarding the process of regulation and implementation of the Carbon Border Adjustment Mechanism (CBAM), promoted by the European Commission.

We understand that, under the current conditions, it will be difficult to comply in a timely manner with the requested requirements, affecting the traditional trade processes of our steel producing members in the region.

As of the date of this statement, the official information published on the European Commission's website ([link](#)) is confusing and incomplete, as far as the future methodology is concerned. For example, the model that is available as a tool for communication between plant operators and importers raises concerns regarding the level of detail of the information required, which could affect the compliance rules of the operators.

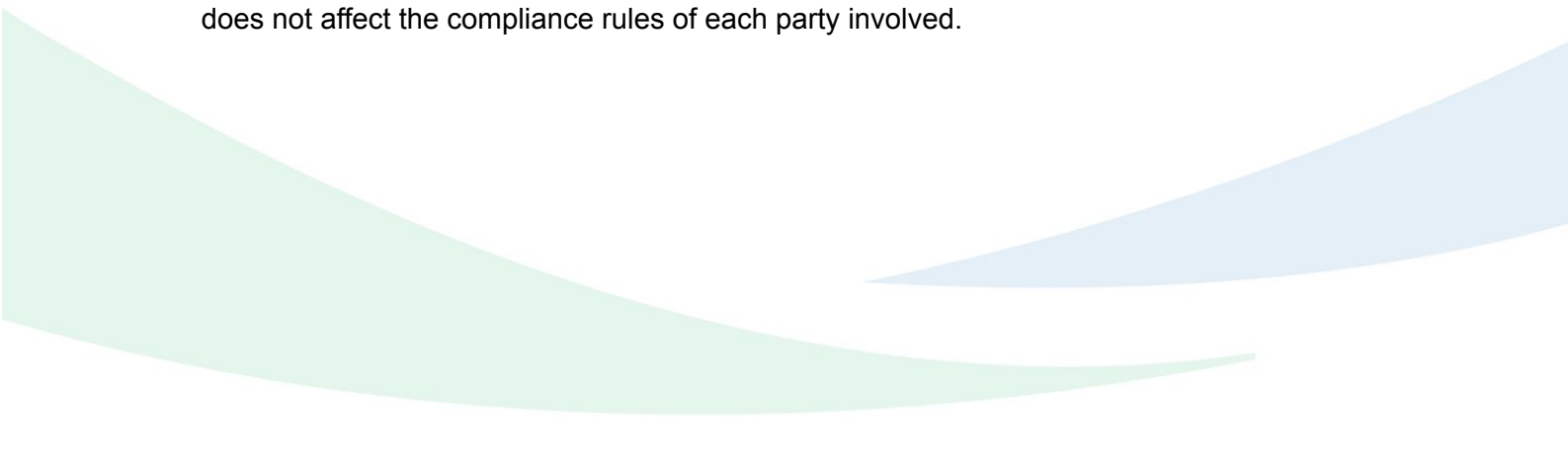
On the other hand, the defined schedule would not be the most adequate and sufficient to comply with a process of such complexity, considering that the transition period defined by the same agency will be between 10/1/2023 and 12/31/2025.

The Guidance documents were only published between 8/17/2023 and 8/22/2023. The proposed training courses are only being announced as of 5/10, even when the transition period has already started.

This situation represents increased administrative processes, with their consequent economic costs, affecting developing regions in an unequal manner.

Our industry is fully committed to the energy transition and we understand that it is a complex process, which must be fair and realistic, taking the situation and available resources of each industry and each country into account. Unlike the countries that make up the European Union, Latin American countries do not have subsidies or non-refundable aid to finance the transition or the adoption of disruptive decarbonization technologies.

We ask whoever is responsible to analyze a possible extension of deadlines, accelerate and improve communications and training, as well as to ensure that the information requested does not affect the compliance rules of each party involved.



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