



EUROPEAN FERTILISER
BLENDERS ASSOCIATION



Ref. COMM(25)03345
10/12/2025

Joint Statement

Rearranging deck chairs on the CBAM Titanic

Farmers, agri-cooperatives, food processors, traders and fertiliser blenders warn that the small tweaks to the CBAM tax calculation formula introduced by the secondary legislation adopted today will not prevent the risk of fertiliser shortages or the prohibitive production costs threatening EU crop production.

Over the past months, we have repeatedly warned institutions about the drastic impact that the entry into force of the Carbon Border Adjustment Mechanism (CBAM) for fertilisers on 1 January 2026 would have, given that many elements required for its calculation remain unresolved. It appears that the Commission and Member States have heard these concerns and are now attempting to provide quick fixes on some of these elements, such as benchmarks and default values. Although we welcome the intention, the reality is that the secondary legislation published today will not resolve the situation.

We welcome the work on the benchmarks and the setting of the default values, but one of the key components of the CBAM calculation remain unaddressed: the CBAM carbon certificate. As long as the platform for CBAM carbon certificates remains unfinished, planned only for 2027, the CBAM tax will have to be based on the quarterly average CO₂ price following the placing of an order by fertiliser importers. Given that the CO₂ price can fluctuate significantly over three months, this creates enormous financial uncertainty for importers who are not in a position to take on such risk.

With only two out of three key factors needed for CBAM calculation clarified, financial uncertainty for EU fertiliser blenders and importers remains total, preventing them from placing further orders, while 50% of EU fertiliser supplies come from third countries. Moreover, aside from the reduction in the mark-up for default values, which is appreciated, no measures have been proposed to offset CBAM-related costs for farmers. At a time when many EU arable farmers are facing very low or even negative margins, now for the third consecutive year in some Member States, due to sharply rising production costs since 2020, this is simply unacceptable. We call on the Commission, Member States and the European Parliament to take action.

In this context, we once again jointly call on the European Commission and Member States to postpone the implementation of CBAM for fertilisers until the following conditions are met:



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EU Transparency Register Number | Copa 44856881231-49 | Cogeca 09586631237-74

1. All technical elements determining CBAM costs are finalised in a way that ensures full price predictability at the moment of importation and invoicing.
2. Effective measures are put in place to offset CBAM-related costs for farmers, preventing further cost increases and safeguarding the competitiveness of EU agriculture and food supply chains.

We cannot afford half measures at a time when the viability of EU agricultural production is at risk and when the competitiveness and resilience of the wider food chain are being called into question, with potential consequences for consumer prices.

-END-

On behalf of the following associations:

AIBI - The European Association of Industrial Bakers

CEFS - European Association of Sugar Manufacturers

CEPM - European Confederation of Maize Production

CIBE - International Confederation of European Beet Growers

Coceral - European association of trade in cereals, oilseeds, rice, pulses, olive oil, oils and fats, animal feed and agrosupply

Copa Cogeca - The United Voice of Farmers and their Cooperatives in the European Union European Flour Millers

European Flour Millers - The association representing the European wheat, rye and oat milling industry both at EU & international levels

ELO - European Landowners' Organization

EOA - European Oilseed Alliance

EFBA - European Fertiliser Blenders Association

PFP - Primary Food Processors, the association for the European primary food processing industry

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