

# User Guide for the Access Request Procedure for the Non-EU companies in the CBAM Third Countries Operators Portal

## Carbon Border Adjustment Mechanism

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<sup>&</sup>lt;sup>1</sup> Action: I=Insert R=Replace

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### 1. Introduction

### 1.1 DOCUMENT PURPOSE

Non-EU companies who would like to become Carbon Border Adjustment Mechanism (CBAM) Operators of Third Countries Installations (O3CI) must have access to the CBAM Phase 2 Registry to register and report information about their company and their installations as well as the details of the emissions from their production processes, on a voluntary basis.

Therefore, the purpose of this document is:

- To provide general business guidance related to the Legal Acts that govern the CBAM domain for the non-EU companies who would like to become CBAM Operators.
- To provide the access request steps that should be followed by non-EU Companies in order to get access to the CBAM Operators portal. Moreover, this document provides guidelines for the process access right request, modification and revocation.

A separate document, the <u>User Manual for the Third Countries Operators portal</u>, is describing the steps that should be followed in order to apply and become a registered CBAM Operator of Third Countries Installations and be able to submit information about the emissions from the production processes for the CBAM-related goods.

### 1.2 TARGET AUDIENCE

The target audience for this document includes:

- European Commission;
- Operators of Third Countries' Installations.

### 1.3 STRUCTURE

This document is organised as follows:

**Chapter 1 – Introduction**: describes the scope and the objectives of the document;

- Chapter 2 Business Guidance on the CBAM processes: describes the general guidance on the legal acts governing the CBAM domain, as well as guidance on the main processes and how to add data about the companies.
- **Chapter 3 Step-by-step guidance on the access request process**: defines the guidelines and step-by-step procedure for granting access to the CBAM Registry.
- **Chapter 4 Guidance on the use of the CBAM Operators Portal to apply for registration**: defines the guidelines on how to consult the user manual for the CBAM Operators portal in order to apply to become a registered CBAM Operator.

### 1.4 REFERENCE DOCUMENTS

The table below lists the documents that are referred to in the current document.

Ref.	Title	Originator	Version	Date
R01	General Data Protection Regulation	REGULATION (EU) 2016/679 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC	-	27/04/2016
R02	Internal Data Protection Regulation	REGULATION (EU) 2018/1725 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 23 October 2018 on the protection of natural persons with regard to the processing of personal data by the Union institutions, bodies, offices and agencies and on the free movement of such data, and repealing Regulation (EC) No 45/2001 and Decision No 1247/2002/EC	-	23/10/2018
R03	CBAM Regulation	Regulation (EU) 2023/956 of the European Parliament and of the Council of 10 May 2023 establishing a carbon border adjustment mechanism	-	10/05/2023

**Table 1: Reference documents** 

### 1.5 APPLICABLE DOCUMENTS

The table below lists the documents to which the current document must be compliant (e.g. FWC, SC, RfA).

Ref.	Title	Originator	Version	Date
A03	CBAM Regulation	Regulation (EU) 2023/956	-	10/05/2023
		of the European Parliament		
		and of the Council of 10		
		May 2023 establishing a		
		carbon border adjustment		
		<u>mechanism</u>		

**Table 2: Applicable documents** 

### 1.6 ABBREVIATIONS & ACRONYMS

For a better understanding of the present document, the following table provides a list of the principal abbreviations and acronyms used.

Abbreviation/ Acronym	Meaning	
CBAM	Carbon Border Adjustment Mechanism	
DG TAXUD	Directorate General for Taxation and Customs Union	
EU	European Union	
EC	European Commission	
GDPR	General Data Protection Regulation	
IDPR	Internal Data Protection Regulation	
O3CI	Operators of Third Countries Installations	
TCEMPL	Third Country Operator Employee	
TCO	Third Country Operator	
UAM	User Access Management	
MFA	Multi Factor Authentication	

**Table 3: Abbreviations and acronyms** 

### 1.7 **DEFINITIONS**

Term	Meaning	
Operators of 3rd	Installation operators in 3rd countries are the persons who operate or control an	
Countries	installation in a 3rd country.	
Installations	·	
Access Request	An EC Official with the authority to approve or deny access to the CBAM	
Validator	Operators Portal for O3CIs from a business perspective.	
EU Login	European Union user authentication service.	
EU Access	EU Access serves as the infrastructure-layer authorisation solution for the	
	O3CI portal.	
TEMPO	TEMPO (TAXUD Electronic Management of Project Online) is a Quality	
	Management System (QMS) that has been established in the DG TAXUD IT	
	Unit environment to support its business goals and objectives.	

**Table 4: Definitions** 

### 2. BUSINESS GUIDANCE ON THE CBAM PROCESSES

### 2.1 Introduction

To ensure compliance with the CBAM Regulation, the **Third Country Operators Portal** section of the CBAM Registry has been established. This portal allows installation operators outside the EU to upload and share their installation and emissions data with reporting declarants in a streamlined manner, eliminating the need for multiple submissions. The portal safeguards business-sensitive data, enabling reporting declarants to automatically populate their CBAM reports with emissions data to meet reporting obligations efficiently.

The legal base for the establishment of the operators portal is **Article 10** of the CBAM Regulation, which provides:

- 1. **Registration**: The Commission shall, upon request from an operator of an installation located in a third country, register the operator's information in the CBAM registry.
- 2. **Information Required for Registration**: The registration request shall include:
  - o (a) The operator's name, address, and contact information;
  - o (b) The location of each installation, with complete address and geographical coordinates (longitude and latitude) accurate to six decimal places;
  - o (c) The installation's main economic activity.
- 3. **Updates to Information**: The operator shall inform the Commission promptly of any changes to the registered information, and the Commission shall update the CBAM registry accordingly.
- 4. **Validity of registration**: The registration will be valid for a period of five years from the date of its notification to the operator of the installation, and is renewable.

#### 5. Emissions Data:

- o (a) Operators determine the embedded emissions associated with each type of good produced at the installation; (This is only for operators who wish to share emissions data with the declarants on a voluntary basis)
- o (b) Ensure emissions data is verified; (applicable only from 2026)
- o (c) Keep a copy of the verification report and records used to calculate embedded emissions for four years after verification. (applicable only from 2026)
- 6. **Data Disclosure to CBAM Declarants**: An operator may disclose emissions data<sup>2</sup> to an EU declarant, who can use this information to meet its reporting obligations.

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<sup>&</sup>lt;sup>2</sup> Verification by an external independent body will only be mandatory from 2026 for reporting based on actual values. Secondary legislation for the definitive period is planned to be adopted in Q3 2025 and will define the rules for verification of emissions.

7. **Deregistration**: An operator may request deregistration from the CBAM registry at any time. The Commission may also deregister an operator, after giving them an opportunity to be heard, if the provided information is no longer accurate.

Furthermore, **Article 14(4) of the CBAM Regulation** addresses confidentiality, specifying that the CBAM registry data under Article 10(2) shall remain confidential. However, names, addresses, and contact information of operators and the locations of installations in third countries may be made public. Operators have however the option to withhold their names, addresses, and contact information from public access. Public registry information shall be accessible in an interoperable format provided by the Commission.

### 2.2 MAIN BUSINESS PROCESSES

The key business processes involved in CBAM registration include:

- I. Registration: Operators must complete the registration process through the CBAM Portal to gain access. Here are the steps:
  - Create EU login account and access CBAM Portal

A company from a third country begins by creating an EU Login account to join the CBAM Portal and apply as a Registered CBAM Operator.

Here are the relevant links:

**EU Login**: https://webgate.ec.europa.eu/cas/

EU Access (Add Delegations): <a href="https://webgate.ec.europa.eu/eu-access/admin-ext">https://webgate.ec.europa.eu/eu-access/admin-ext</a>

CBAM Portal: <a href="https://cbam.ec.europa.eu/o3cinstallation">https://cbam.ec.europa.eu/o3cinstallation</a>

### ☐ Approval process by the European Commission (COM)

Before accessing the CBAM Portal, the company must receive approval from the COM:

- Log in to EU Access.
- Enter generic company information as required.
- Upload supporting documents to verify the company's identity.
- A COM administrator in EU Access reviews and approves the application, granting portal access.

### Application process to become a registered CBAM Operator

Once approved by the COM to access the CBAM Portal, the company can proceed with the application:

- Log in to the CBAM Portal.
- Submit a registration request containing the elements provided in Art. 10(2) of the CBAM Regulation: Complete details on the operator and installation(s).
- Upload additional supporting documents:

- Registration certificate of operator (proving the operator is legally registered, including name, address and contact information, and tax identification number or equivalent),
- Installation registration (Establishment of the installation, control/ownership structure, main economic activity, license/permits to operate legally in its industry and location),
- Installation location (Documents for each installation under control of the operator, proving the installation's location, including the complete address and geographical coordinates expressed in longitude and latitude, including six decimals),
- o **Other Documents** (e.g. Specific documents related to the change being requested, such as a change of address form, new ownership documents).

### **☐** Submit and Approval

- The company submits its application to become a Registered CBAM Operator.
- A COM administrator in the CBAM Portal reviews and approves the company, thereby granting Operator access to the operators' portal.
- II. Request for Change: Operators can submit requests to update their registered information. This concerns the data-elements of Art. 10(2). The Commission will approve the request when adequate supporting documents are submitted.
- III. Sharing of Emissions Data: Operators will have the option to share emissions data with declarants through the portal in the initial phase using specific EORI numbers, starting from January 2025. Later in 2025, this functionality will be expanded to enable sharing with all EORIs at once. This is designed to facilitate familiarization with the system during the transitional period.
- IV. **Time-Validity of Registration**: The Commission notifies the operator of the registration in the CBAM registry. The registration is valid for a period of five years from the date of its notification to the operator of the installation, and is renewable.
- V. **Deregistration**: Operators may deregister from the system if they cease operations, no longer meet regulatory requirements, or if they just do not wish to be registered anymore.
- VI. Verification: Further details will be available once secondary legislation is enacted.

### 2.3 CLARIFICATION ON THE LEGAL BASIS FOR THE TRANSITIONAL VS. DEFINITIVE SYSTEM

As per the Regulation, operators can begin registering in the operators' portal starting January 2025. To streamline data sharing and simplify CBAM implementation during the transitional period, the Commission has enabled operators to share emissions data with declarants from January 2025. This approach allows operators and declarants to become acquainted with the system before the definitive period begins.

### 2.4 GUIDANCE FOR HANDLING INCORRECT OPERATOR DATA

If operators' data is incorrect, declarants may amend the emissions data received. IT teams are currently working on a solution to make operator data amendable; however, until this is available, declarants noticing errors (e.g., significant errors in emissions data due to comma placement) should choose not to accept the data shared by operators and instead enter the information manually.

### 2.5 ADDRESS ENTRY GUIDELINES

If no street name or number is available, and only a P.O. Box is provided, enter "N/A" and the P.O. Box in the address field. For the installation address, the Regulation mandates a complete address, so apply the same approach as above.

For countries without postal codes, enter "0000" as the post-code.



# 2.6 REQUIRED DOCUMENTS FOR EU ACCESS REQUEST AND REGISTERED CBAM OPERATOR STATUS

- 1. Documents for EU Access where the access request is to be done:
  - Registration Certificate of the Operator<sup>3</sup>: Demonstrates that the operator is legally registered and includes essential details (name, address, contact information, and tax ID or equivalent).

 $User\ Guide\ for\ the\ Access\ Request\ Procedure\ for\ the\ Non-EU\ companies\ in\ the\ CBAM\ Third\ Countries\ Operators\ Portal\ -\ Carbon\ Border\ Adjustment\ Mechanism$ 

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<sup>&</sup>lt;sup>3</sup> Power of Attorney – An official document granting the individual authority to act on behalf of the company in specified legal matters or;

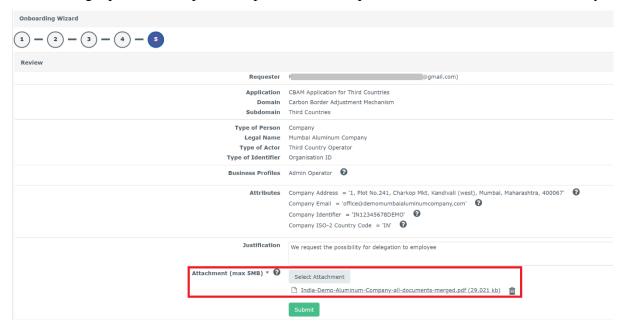
Court Registration Decision – A document that lists individuals authorized to represent the company, as registered with the court or;

Extract from the Commercial Register – Often includes details of directors and other individuals with legal representation rights or;

Employment or Engagement Contract – A contract that explicitly states the authority of an employee or consultant to act on behalf of the company.

- Document Proving Authority to Represent the Company: Provides proof that the representative is authorized.
- **ID** of the Authorized Representative: Identity document of the representative.

In order to send the 3 types of documents at once to the Commission, please merge the documents into one single pdf file and upload the pdf file in the request for access from the EU Access system.

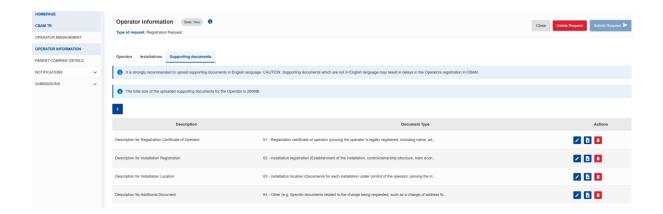


Once approved by the Commission to access the CBAM Portal, the operator can initiate the application process to become a Registered CBAM Operator and will need to upload the following supporting documents:

### 2. Documents for Becoming a CBAM Registered Operator:

- Registration Certificate of Operator: Verifies the operator's legal registration, including essential company details.
- Installation Registration: Information on the establishment of the installation, ownership/control structure, primary economic activity, and necessary operating permits.
- Installation Location: Documentation proving each installation's location under the operator's control, with complete address details and geographical coordinates (longitude and latitude with six decimals).
- Additional Documents: Any specific documents related to requested changes (e.g., change of address forms or updated ownership documents).

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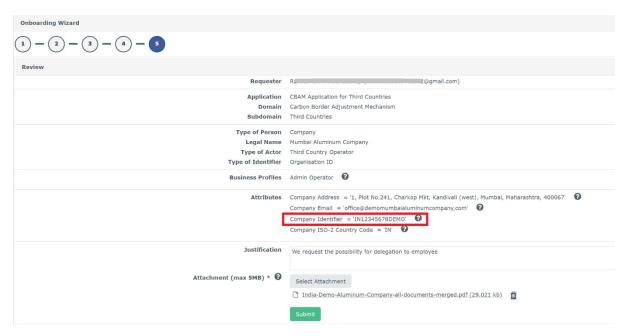
### 2.7 GUIDANCE FOR KEY COMPANY IDENTIFIERS

- **EORI Number**: The Economic Operators Registration and Identification (EORI) number is a unique identifier assigned to businesses and individuals engaged in customs-related activities within the European Union. It is required for importers and exporters who deal with customs authorities in the EU to conduct cross-border trade. The EORI number simplifies customs processing and tracking by providing a consistent, EU-wide identification number for all economic operators.
- Company Identifier Operator ID/Corporate Registration Number (CRN): Company Identifier represents the corporate registration number. This is a unique identifier assigned to a business entity upon its official registration with a national or regional business registry. This number serves as proof of a company's legal existence and is used for identification and record-keeping purposes by government agencies, financial institutions, and regulatory authorities. The format of this identifier varies by country, often consisting of a series of numbers, letters, or a combination that uniquely identifies the business. The company identifier should start with a 2-letter country code. The maximum size of this identifier is of 25 characters.

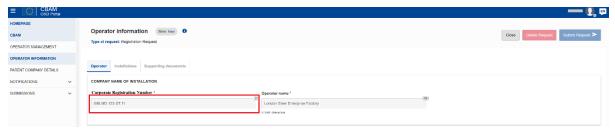
Example demo identifiers (not to be used in your request):

- IN123456ABCD (IN for the 2-letter country-code for India, followed by some letters and numbers)
- o BR.XYZ-1234567890 (BR for the 2-letter country-code for Brazil, followed by a separator (dot), followed by other characters.

Example for the company identifier in the request for access from the EU Access system:



Example for the company identifier in the registration request from the CBAM Third Countries Operators portal system:



### 3. STEP-BY-STEP GUIDANCE ON THE ACCESS REQUEST PROCESS

### 3.1 ROLES

With regards to O3CI Portal users, there are two actors that can gain access to the O3CI Portal. Table 5 presents the two types of actors:

Actor	Role
Third Country Operator (TCO)	This refers to the legal entity. It can be the CEO/legal representative for the operator who applies for access to the O3CI portal.
Third Country Operator Employee (TCEMPL)	This refers to a natural person (employee) who receives a delegation by the TCO to access the O3CI portal.

Table 5: O3CI Roles

The TCO is the legal entity that initially requests access to the O3CI portal. However, the TCO can delegate access to the O3CI portal to an employee (TC EMPL) via the EU Access Admin-Ext portal. A high-level view of this process is depicted below:

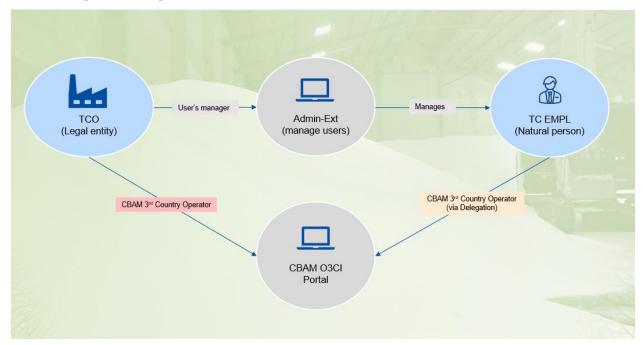


Figure 1: O3CI roles relationship

TCO can gain access to the O3CI portal via the process described in section 3.2.1.

TCO can delegate access to the TCEMPL via the process described in section 3.2.2.

### 3.2 USER REGISTRATION PROCEDURE (O3CI)

### 3.2.1 Registration Procedure (TCO)

The figure below presents the workflow for becoming a registered user in CBAM 3<sup>rd</sup> Country Installations Operators Portal:

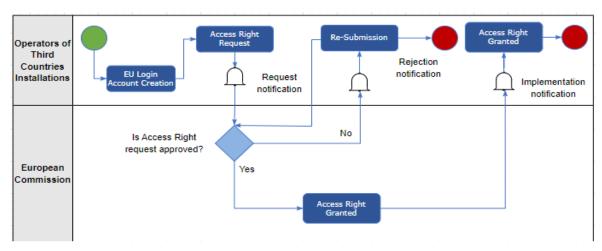


Figure 2: TCO Registration workflow

### 3.2.1.1 EU Login Account creation

A pre-requisite for an O3CI to request access to the CBAM Registry is the creation of an EU Login account. EU Login is the entry gate to sign in to different European Commission services and/or other systems. EU Login verifies your identity and allows recovering your personal settings, history and access rights in a secure way.

For guidelines on how to create an EU Login account, please refer to the relevant <u>EU Login frequently-asked-questions</u> (FAQs).

Please note that in order to authenticate in EU Login, 2-factor authentication is required, so this needs to be appropriately setup. Please consult the <u>EU Login tutorial</u> in order to select the preferred authentication method among the options below:

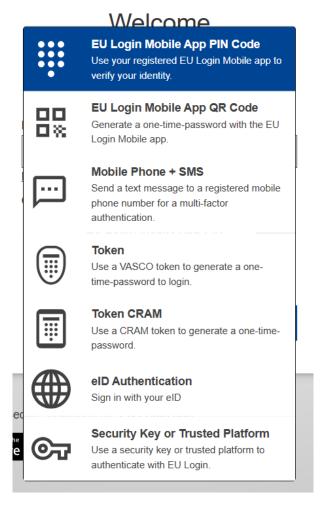


Figure 3: EU Login authentication methods

Depending on the country, the availability of authentication methods may vary.

For the purpose of the CBAM O3CI Portal, the recommended 2-factor authentication methods are any of the following:

- EU Login Mobile App PIN Code;
- EU Login Mobile App QR Code;
- Security Key or Trusted Platform.

Please note that in some countries the Google or Apple stores/services might not be available, thus the EU Login Mobile App is not available. In these cases, in order to authenticate you need to register your Security Key or Trusted Platform. The only requirement for the security key is to be FIDO2 certified (e.g. Yubikey).

You will be able to <u>register a Security Key/Trusted Platform following the EU Login tutorial</u> on this matter, which also includes a video tutorial with the necessary steps.

### 3.2.1.2 Registration request through EU Access

Once an EU Login account has been successfully created, the TCO can proceed to submit a registration request through EU Access by following the steps below:

a) Click on the following link: <a href="https://cbam.ec.europa.eu/o3cinstallation">https://cbam.ec.europa.eu/o3cinstallation</a>, add your email address in the indicated field and click on "Next" (the same email address used to create your EU Login account).

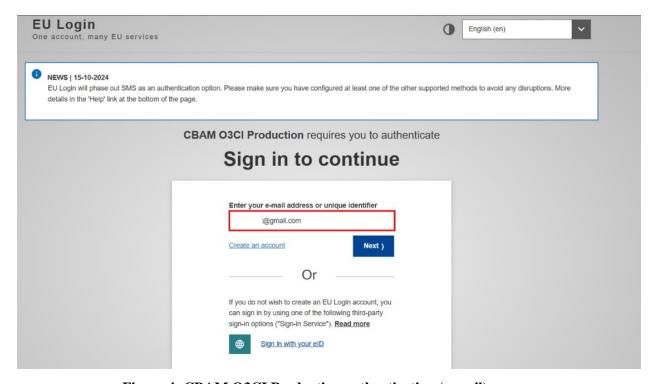


Figure 4: CBAM O3CI Production authentication (e-mail)

b) Enter your password in the indicated field as displayed below, select the verification method of choice and click on "sign in" (the same password used when creating your EU Login account). For this example, we have selected the "EU Login Mobile App PIN code" as the authentication method.

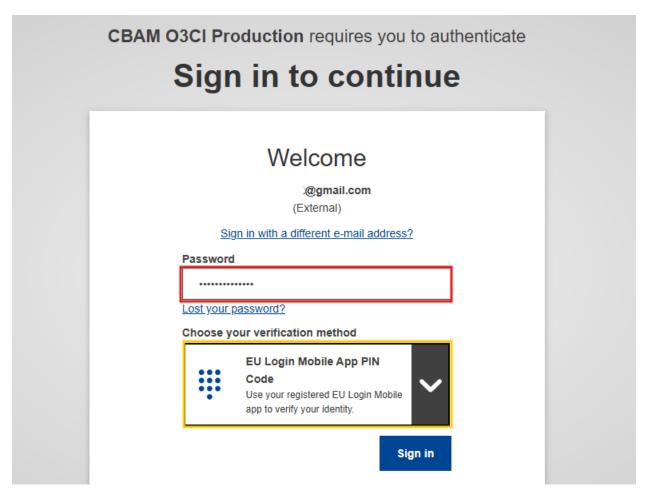


Figure 5: CBAM O3CI Production authentication (password and verification method)

c) You will receive a message indicating that "No EU Access identity profile" is found. Click on "Request an EU Access profile" as displayed below:



Figure 6: Request an EU Access profile

d) You will then be redirected to the onboarding page where you will be prompted to enter the company identity details as indicated below:

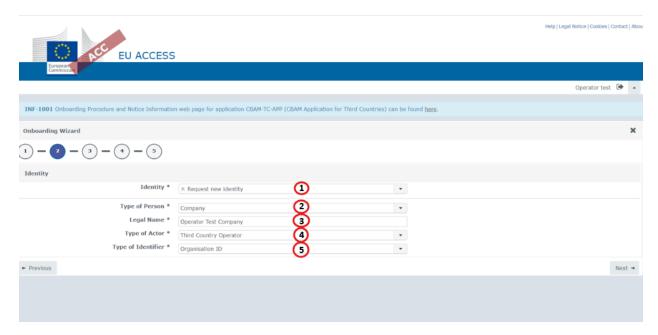


Figure 7: EU Access onboarding - Company Identity Details

Field N	No. Field Name	Field Description
1	Identity	Retain default selection "Request new identity"

Field No.	Field Name	Field Description
2	Type of Person	As a legal entity requesting access, select "Company" from the dropdown
3	Legal Name	Enter the legal name of the company
4	Type of Actor	As a legal entity requesting access, select "Third Country Operator"
5	Type of Identifier	Select the OrganisationID, which represents the corporate registration number of your company in the Third Country

**Table 6: Company Identity Details** 

e) On the next step, you will be prompted to select the assignable profiles where you need to select both profiles by default (if you are an administrator submitting a registration request for the first time) in order to be able to perform delegation of access rights, as described in section 3.2.2:

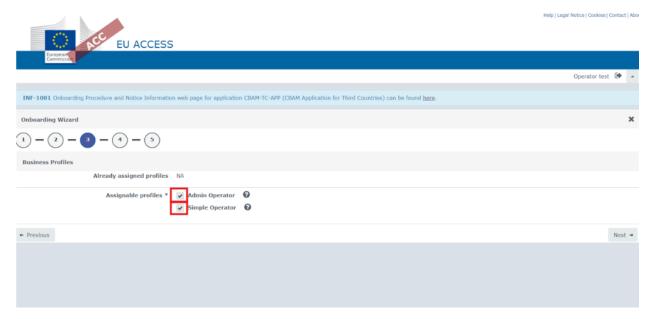


Figure 8: EU Access onboarding - Business Profiles

- 1. **Admin operator**: Allows the TCO to access the CBAM Portal and submit requests to the European Commission (e.g request to become a registered operator, request for change, request for revocation etc). It is strongly recommended to select both admin and simple operator roles.
- 2. **Simple Operator**: Only allows to save a request (e.g fill in and save a request to become a registered operator but not submit). It is strongly recommended to select both admin and simple operator roles.

f) On the next step, you will be prompted to add the company attribute values, as indicated below:

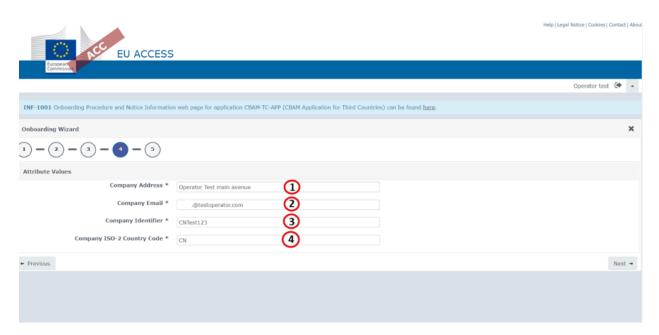


Figure 9: EU Access onboarding - Company Attribute Details

Field Name	Field Description
Company Address	Enter your company's physical address
Company Email	Enter your company's email address
Company Identifier	Company Identifier represent the corporate registration number.  This is a unique identifier assigned to a business entity upon its official registration with a national or regional business registry. This number serves as proof of a company's legal existence and is used for identification and record-keeping purposes by government agencies, financial institutions, and regulatory authorities. The format of this identifier varies by country, often consisting of a series of numbers, letters, or a combination that uniquely identifies the business.  The company identifier should start with a 2-letter country code. The maximum size of this identifier is of 25 characters.  Users are expected to add at the beginning of their national corporate registration number the 2-letter country code of their country of incorporation (Example: if your national
	Company Address Company Email

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Field No.	Field Name	Field Description
		identifier is 12345 and you are domiciled in a country with country code**, please report **12345)
		Example identifiers (not to be used in your request):
		<ul> <li>a) IN123456ABCD (IN for the 2-letter country-code for India, followed by some letters and numbers);</li> <li>b) CA.XYZ-1234567890 (CA for the 2-letter country-code for Canada, followed by a separator (dot), followed by other characters.</li> </ul>
4	Company ISO-2 Country Code	Enter the 2-letter code of the country where your company is based
		Example:
		CN for China
		CA for Canada
		<ul> <li>IN for India</li> </ul>

**Table 7: Company attribute details** 

- g) On the final step, you will have the opportunity to review a summary of the details you have entered and:
  - Add a justification for your registration request (optional);
  - Attach justification documents (mandatory) to prove the identity of your company.

It is only possible to submit one file together with the request.

It is strongly advised to upload supporting documents exclusively in PDF format (to prevent potential rejection or denial of system access). To incorporate multiple business documents into a single technical file, please merge them into one PDF file.

The required business-type of documents to be uploaded are:

Registration Certificate of the Operator<sup>4</sup>: Demonstrates that the operator is legally registered and includes essential details (name, address, contact information, and tax ID or equivalent).

Employment or Engagement Contract – A contract that explicitly states the authority of an employee or consultant to act on behalf of the company.

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<sup>&</sup>lt;sup>4</sup> Power of Attorney - An official document granting the individual authority to act on behalf of the company in specified legal matters or;

Court Registration Decision – A document that lists individuals authorized to represent the company, as registered with the court or;

Extract from the Commercial Register - Often includes details of directors and other individuals with legal representation rights or;

- **Document Proving Authority to Represent the Company**: Provides proof that the representative is authorized.
- **ID** of the Authorized Representative: Identity document of the representative.

After adding the required documents, please submit your request, as indicated below:

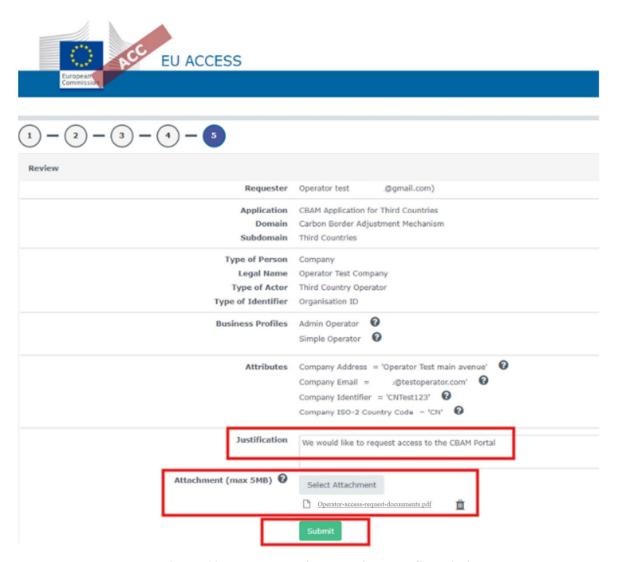


Figure 10: EU onboarding - Review and Submission

An administrator at the European Commission will process your access request and you will be notified for the acceptance or rejection of the access request via an email. This process might take a few days after submitting the request.

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Document Version 1.00 EN dated 04/12/2024 Confidentiality: Publicly available (PA) If the access request is accepted, you should receive the below email notification, where "CBAM-TC-APP" refers to a technical code for the O3CI CBAM portal:

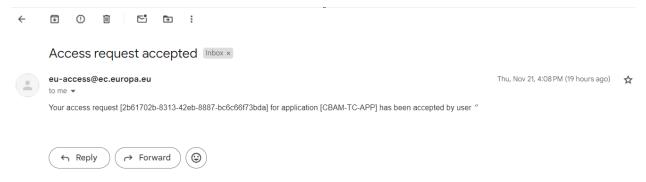


Figure 11: EU Access Registration - Acceptance email

If you do not receive an email notification after a few days, please also ensure to check your spam folder in case it has landed there.

In case the access request is rejected, the email notification will include a justification. Please consider the feedback and restart the registration process.

### 3.2.2 Delegation of Access Rights to Employees (TCEMPL)

The figure below presents the workflow for delegating access rights to employees of the TCO:

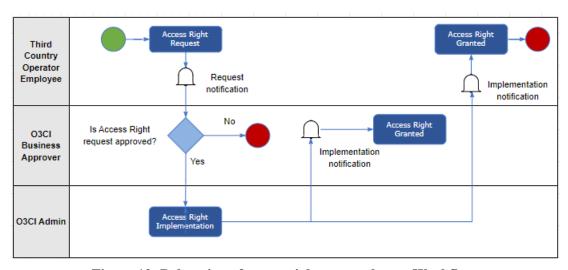


Figure 12: Delegation of access rights to employees Workflow

### 3.2.2.1 Pre-requisites for delegation of access to TCEMPL

The O3CI administrator has the option to delegate access to the O3CI portal to an employee. In order to do so, the following pre-requisites apply:

• The TCO registration request has been accepted by the European Commission (an email notification is received, indicating the positive outcome of the request).

- The "Admin Operator" was accurately selected under the "assignable profiles" section (as indicated in step (e) under section 3.2.1.2).
- The employee has successfully created an EU Login account (as specified in section 3.2.1.1).

### 3.2.2.2 Delegation of access through EU Access Admin-Ext

Once the pre-requisites defined under 3.2.2.1 have been fulfilled, please follow the steps below to delegate access to an employee:

a) Click on the following link: <a href="https://webgate.ec.europa.eu/eu-access/admin-ext">https://webgate.ec.europa.eu/eu-access/admin-ext</a>, add your email address in the indicated field and click on "Next" (the same email address used to create your EU Login account).

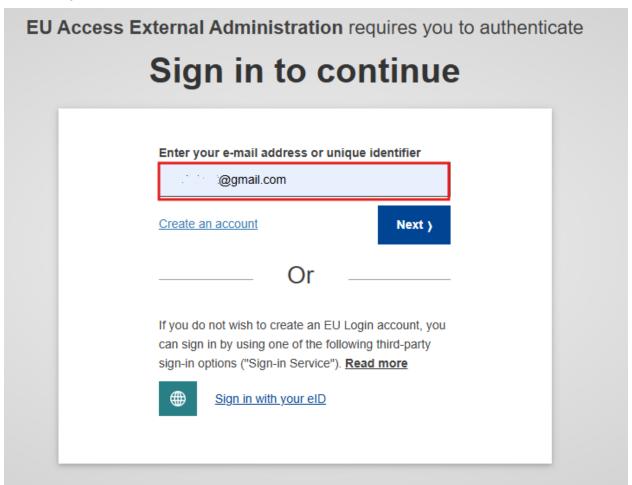


Figure 13: EU Access Admin-Ext authentication (e-mail)

b) Enter your password in the indicated field as displayed below, select the verification method of choice and click on "sign in" (the same password used when creating your EU Login account). For this example, we have selected the "EU Login Mobile App PIN code" as the authentication method.

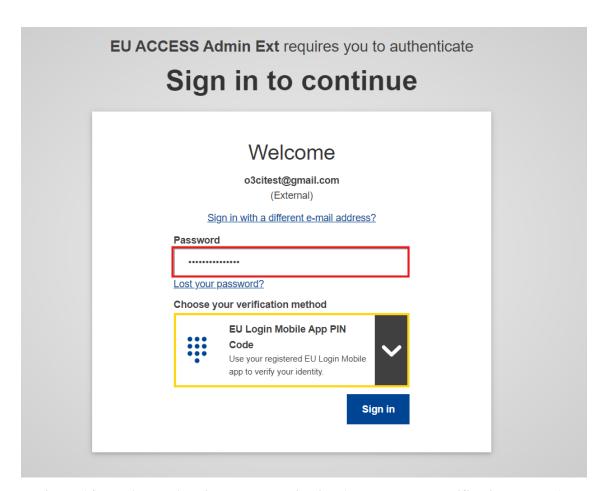


Figure 14: EU Access Admin-Ext authentication (password and verification method)

c) Once you have successfully authenticated in EU Access Admin-Ext, click on "View" under "Subdomains" in the left panel

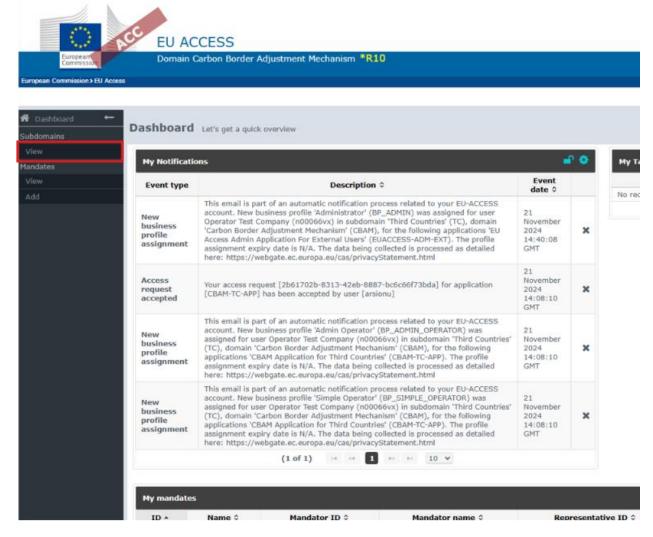


Figure 15: EU Access Admin-Ext Dashboard - View Subdomains

d) Then click on the "View" icon as indicated by the red outline below

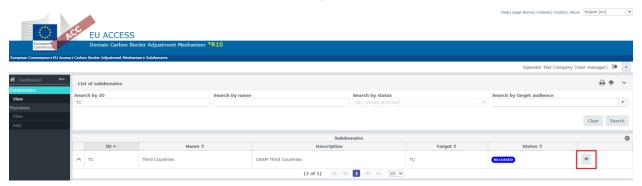


Figure 16: EU Access Admin-Ext - View CBAM Third Countries Subdomain

e) The next step is to complete the 5 fields as indicated below and click on "select user"



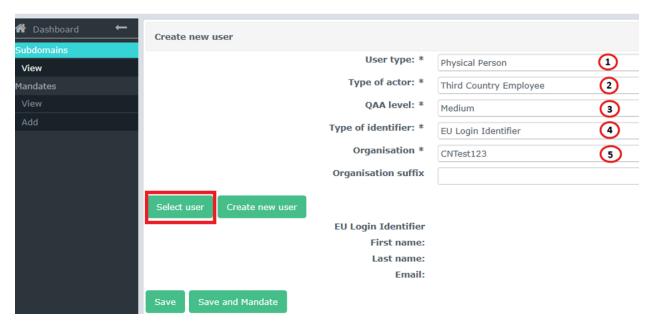


Figure 17: EU Access Admin-Ext - Create new user

Field No.	Field Name	Field Description
1	User Type	Select "Physical Person" as you are delegating access to a specific employee
2	Type of actor	Select "Third Country Employee" as the type of actor receiving the delegation
3	QAA level	Select "Medium" as the QAA security level in order to allow the employee to be authorized in the O3CI Portal
4	Type of identifier	Select "EU Login Identifier"
5	Organisation	Organisation corresponds to the Company Identifier, also referenced as corporate registration number.  This is a unique identifier assigned to a business entity upon its official registration with a national or regional business registry.
		This number serves as proof of a company's legal existence and is used for identification and record-keeping purposes by government agencies, financial institutions, and regulatory authorities. The format of this identifier varies by country, often

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consisting of a series of numbers, letters, or a combination that uniquely identifies the business.

The organisation/company identifier should start with a 2-letter country code. The maximum size of this identifier is of 25 characters.

Example identifiers (not to be used in your request):

- a) IN123456ABCD (IN for the 2-letter country-code for India, followed by some letters and numbers);
- b) BR.XYZ-1234567890 (BR for the 2-letter country-code for Brazil, followed by a separator (dot), followed by other characters.

**Table 8: Employee details** 

f) You will then have the option to search for a user with an existing EU Login account. You can search by email by entering the employee email address in the relevant field as indicated below. Then click on search and the user should appear. Then, click on the avatar icon as depicted in the screenshot below

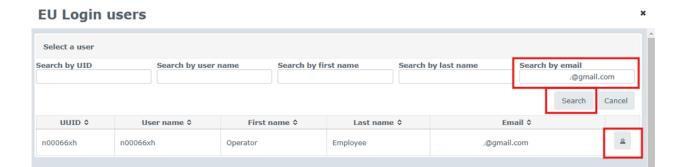


Figure 18: EU Access Admin-Ext - Search EU Login user

g) At this point, you will be returned to the previous screen where you should see the details of the employee appearing (EU Login identifier, First Name, Last Name and Email). Please proceed to click on "Save and Mandate"

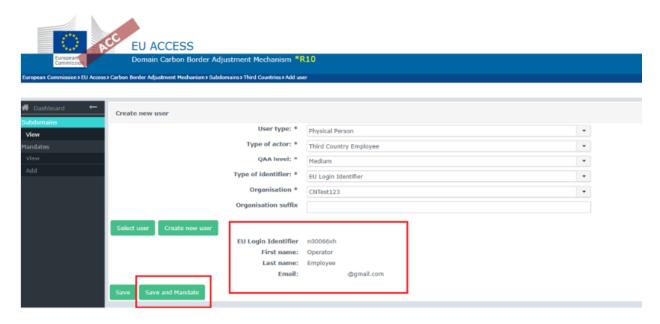


Figure 19: EU Access Admin-Ext - View employee details, Save & Mandate

h) At this stage, please click on the "Add" button under "Mandates" in the left panel and then click on "Select representative" as displayed below

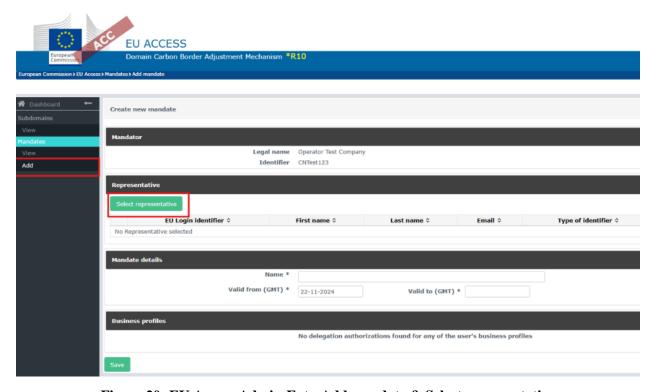


Figure 20: EU Access Admin-Ext - Add mandate & Select representative

i) You will then have the option to search for a user with an existing EU Login account. You can search by email by entering the employee email address in the relevant field as indicated below. Then click on search and the user should appear. Then, click on the avatar icon as depicted in the below screenshot



Figure 21: EU Access Admin-Ext - Search for Representative (EU Login details)

j) Then, please add a "Valid to" date (which indicates the expiration of the mandate), click on the dropdown list next to "Add business profile" and select BP\_SIMPLE\_OPERATOR profile. Finally click on the "+" sign and then "Save".

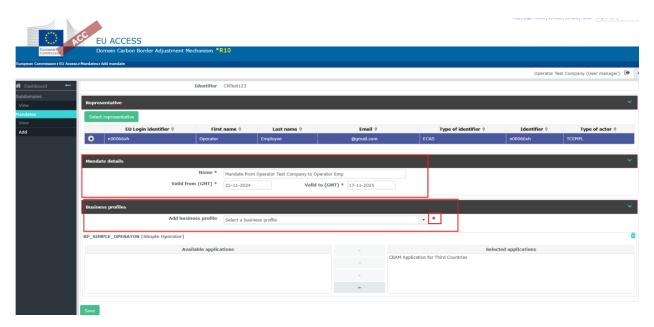


Figure 22: EU Access Admin-Ext - Mandate details & Business Profiles

k) Once successfully completed, you should see a page indicating an "Accepted" mandate and the employee should be able to login to the O3CI portal via the following link, using their EU Login credentials: <a href="https://cbam.ec.europa.eu/o3cinstallation">https://cbam.ec.europa.eu/o3cinstallation</a>

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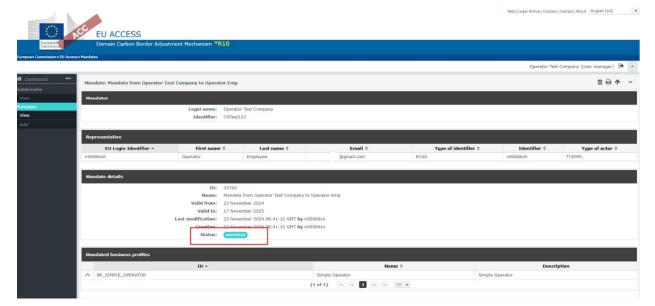


Figure 23: EU Access Admin-Ext - Accepted mandate

### 3.2.2.3 Revocation of delegation through EU Access Admin-Ext

In the event that a TCO would like to revoke the delegated access to an employee, the below steps can be followed:

- a) Login to the Admin-Ext portal, as indicated in steps (a) and (b) in section 3.2.2.
- b) Once you have successfully authenticated in EU Access Admin-Ext, click on "View" under "Subdomains" in the left panel

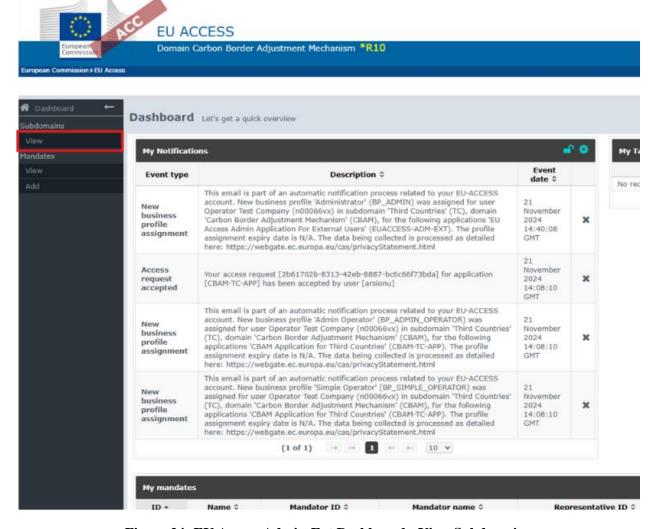


Figure 24: EU Access Admin-Ext Dashboard - View Subdomains

c) Then click on the "View" icon as indicated by the red outline below

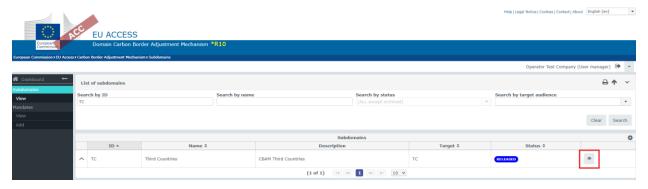


Figure 25: EU Access Admin-Ext - View CBAM Third Countries Subdomain

d) Locate the employee you wish to revoke access from and select the "bin" icon as indicated below. A popup message will ask you to confirm this action, click on "Yes" to proceed.

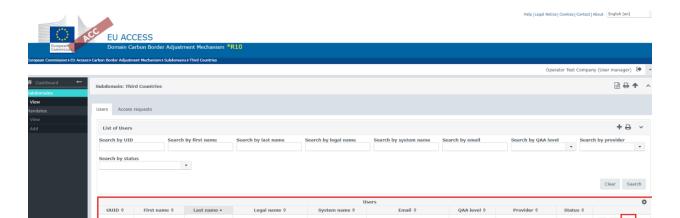


Figure 26: EU Access Admin-Ext - Revoke employee delegation

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### 3.3 USER RESPONSIBILITIES AND SECURITY REQUIREMENTS

To ensure the security of the CBAM Registry, all users, including O3CI and their delegated employees, must adhere to specific responsibilities and security requirements. The European Commission invests significant time and resources in implementing effective controls to mitigate risks and vulnerabilities. However, the security of information also relies on the care exercised by users in their day-to-day roles.

### 3.3.1 User responsibilities

O3CI have specific tasks and responsibilities within the CBAM Registry. These responsibilities include managing their accounts, installations, and user delegations efficiently. The key tasks and responsibilities of O3CI are as follows:

- **Request for Registration**: O3CI can submit a request for registration to register and report the details of the emissions from their production processes, making this information available for CBAM Declarants to refer to in their declarations;
- **Delegation of Users**: O3CI can delegate access rights to CBAM Operators Portal for their employees without requiring additional approvals.

The O3CIs is obligated to provide true and valid information in their requests and submissions.

By fulfilling these tasks and responsibilities, O3CI gains access (approved by the EC) to the CBAM Registry.

### 3.3.2 User Security Requirements and Responsibilities

To prioritise information security and ensure compliance with regulatory standards, users must adhere to the following security requirements:

- Data protection rules of GDPR [R01] and IDPR [R02] are applicable to the CBAM Registry;
- Under the CBAM Registry regulation [R03], all information in CBAM Registry shall be covered by the obligation of professional secrecy (art 13 § 1<sup>5</sup>);
- Users must follow the principles of least privilege, need to know, need to use.

In addition to the password requirements<sup>6</sup> enforced by EU Login, every user plays a vital role in safeguarding their access. To further enhance information security, each user must:

- Utilise a strong password and regularly update it (e.g., every 90 days);
- Never share their password with anyone or allow others to use their account;
- Avoid writing down or storing passwords electronically, such as in files or emails;
- Refrain from using the same password for personal or other business-related accounts;
- Avoid displaying any information containing access credentials, such as login names and passwords;

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All information acquired by the competent Authority or the Commission in the course of performing their duties which is by its nature confidential, or which is provided on a confidential basis shall be covered by the obligation of professional secrecy. Such information shall not be disclosed by the competent Authority or the Commission without the express prior permission of the person or Authority that provided it or by virtue of Union or national law.

<sup>&</sup>lt;sup>6</sup> As set out in the EU Login Tutorial

- Notify the appropriate authorities of any changes in their role or access requirements;
- Use Multi-Factor Authentication (MFA) wherever applicable;
- Notify if the account has been leaked or compromised and immediately change the password.

Finally, the use of a Password Manager application is strongly recommended.

### 3.3.3 Compliance

Compliance with CBAM security requirements described in this document (3.3.2 User Security Requirements and Responsibilities) is mandatory for all individuals accessing the CBAM Registry. Any non-compliance or violation of these requirements shall be reported, investigated, and appropriate actions shall be taken. Regular audits and reviews shall be conducted to assess adherence to this document and the effectiveness of user access controls internally by O3CIs.

### 3.3.4 Data protection and legal notice

The Third Countries Operators portal will function according to the following data protection and legal notice notes:

- Data protection notice
- Legal notice.

### 3.4 ANNEXES

# 3.4.1 Annex I - User Access Management Support For Operators Of Third Countries Installations

Operators of third country installations may encounter access management issues or difficulties when attempting to access the Operator portal.

In such cases, it is important to ensure an efficient resolution by accurately categorizing and communicating the nature of the user access management issues or requests.

In the event of any issues, Third Country Operators should send an email to  $\underline{\text{support@itsmtaxud.europa.eu}}$  for support. The official language of communication when reaching out to the aforementioned email address is English. The working hours of the support desk is 07:00 - 21:00 CET, Monday to Friday.

The following information should be included in the request to facilitate effective troubleshooting:

- URL in Use: The specific URL where the issue is occurring;
- Screenshot of the Error: An attachment of a screenshot reflecting the error message displayed;
- Timestamp of the Error: The date and time when the issue occurred.

# 4. GUIDANCE ON THE USE OF THE CBAM OPERATORS PORTAL TO APPLY FOR REGISTRATION

The Third Countries Operators portal section of the CBAM Registry allows installation operators outside the EU to upload and share their installations and emissions data with reporting declarants in a streamlined manner, instead of submitting it to each declarant separately. Portal allows operators to ensure the confidential treatment of business-sensitive data.

The Third Countries Operators portal is available at the address <a href="https://cbam.ec.europa.eu/o3cinstallation">https://cbam.ec.europa.eu/o3cinstallation</a>.

Non-EU Installation Operators may consult online the <u>User Manual for the Third Countries Operators</u> <u>portal</u>.