

**Subject: Input on the consultation on CBAM – authorising CBAM declarants**

The European Express Association (EEA) is pleased to submit its feedback on the consultation regarding authorising CBAM declarants:

**Timelines for assessing the CBAM application.**

- The proposed assessment periods outlined in Articles 4(1) and 5 of the draft implementing Regulation—120 days for reviewing applications submitted by EU-based importers, extendable to 180 days when additional information is required—are considered by EEA excessively lengthy. Such prolonged timelines risk delaying the timely authorization of CBAM declarants and could impose unnecessary barriers to the import of CBAM goods. The EEA shares this concern and urges the Commission to reconsider these deadlines to ensure a more efficient and streamlined process, facilitating smoother compliance, and avoiding undue disruptions to trade.

**CBAM Declarant – possible increase of current threshold for the definite period?**

- For the last three years, the EEA has proposed to the EU Commission the introduction of a minimum threshold for the most critical flows such as small consignments and B2C traffic based on combined criteria relating to weight, value or volume of the actual importer of CBAM goods. At present, the only de minimis provision in the CBAM regulation is a value threshold set at €150. Unfortunately, the current de minimis provision does not exempt smaller, higher-value consignments (such as those typically carried by express parcels operators) or higher-value consignments with very small CO2 footprints. In order to address this issue, EEA would like to take this opportunity to once again highlight the need to revisit the current threshold.

**Challenges with Forecasting Import Values and Providing Customer Information**

- Article 11 of the draft implementing Regulation further elaborates on the criteria established in Article 17(2)(b) of the CBAM Main Regulation. In particular, paragraph 3 indicates that competent authorities shall take into account the specific characteristics of the applicant, including the information on the estimated volume of imports. Under CBAM Main regulation it is required that declarants provide detailed forecasts, including: the estimated monetary value and volume of imports by type of goods for the calendar year during which the application is submitted, as well as for the following calendar year. As well as the names and contact information of the persons on behalf of whom the applicant is acting, if applicable. While these requirements aim to enhance transparency, they pose significant challenges for indirect customs representatives, such as economic operators offering logistics services, who depend on their customers for this data. The availability and accuracy of such information can fluctuate over time, making precise forecasting difficult. Given these challenges, we urge the Commission to reconsider the feasibility of these requirements or provide additional flexibility for indirect customs representatives, acknowledging the practical limitations of gathering and forecasting such data.

EEA Members remain available should there be questions or requests for clarification. Please kindly provide your feedback to our Secretariat's functional email [tfc@euroexpress.org](mailto:tfc@euroexpress.org) at your earliest convenience.

\*\*\*

*The European Express Association (EEA) is the representative organisation for the express industry in Europe. The industry specialises in time-definite, reliable transportation services for documents, parcels, and freight. It allows European business to rely on predictable, expeditious delivery of supplies, thereby enabling them to attain and maintain global competitiveness.*

*The express industry employs over 330,000 people across the EU and supports a further 410,000 indirect jobs in Europe through the supply-chain. The express industry's employees are widely spread across EU member states.*

*The express industry is a truly intermodal sector. Air-road and air-rail operations form an integral part of the industry's hub and spoke system. Our members use the most efficient transport mode to ensure the timely delivery of our customers' goods. This includes the use of aircraft, but also road vehicles and rail where possible.*