



24 OCTOBER 2022

FROM: Ekaterina Stoyanova

TO: CUSTOMS & INDIRECT TAXATION

SUBJECT: CLECAT Circular 2022/187 (CITI) - Draft CLECAT-EEA joint statement on CBAM

TO DO: Review the draft joint statements and send your comments by 26 October EOB

Dear Member,

As discussed at the last CITI meeting on Friday 21 October, we intend to issue a **Joint statement with the European Express Association (EEA) on the EU Carbon Border Adjustment Mechanism (CBAM)**. You will find the draft statement attached. The statement addresses one of the main concerns shared by both associations, namely the division of the responsibilities and liabilities of the different stakeholders that will be involved in the management of CBAM, including customs representatives. It aligns with earlier positions of CLECAT communicated to policy makers.

In particular, the statement calls for a clear distinction between customs representatives' responsibilities and CBAM responsibilities and refers specifically

to Article 5 of the EU Council general approach, which creates an automatic allocation of CBAM obligations to indirect representatives. The statement also supports the introduction of a system allowing the appointment of an independent CBAM declarant, not necessarily linked to the customs representative.

As the inter-institutional negotiations on the CBAM proposal are continuing, we intend to send the statement to policy makers involved in the trilogues. DG TAXUD informed CLECAT at last week's TCG plenary meeting that the issues raised in the draft joint statement are being discussed in the negotiations. The statement will serve to further advance the understanding of the position and concerns of CLECAT and the EEA and support our advocacy.

We kindly ask you to review the draft joint statement and let us know your comments by Wednesday 26 October EOB.

If you have any questions, please do not hesitate to contact me.

Thank you very much.

Kind regards,

Ekaterina
Policy Advisor

Stoyanova

ATTACHMENTS

 [Draft Eea Clecat Joint Position On General Council Approach Cbam.docx](#)

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