



Joint industry statement on CBAM Regulation (EU) 2023/956 and its amendments

The undersigned European industry associations support the EU's climate objectives and are committed to contributing to the transition to a low-carbon economy. To be effective and credible, climate policy tools must also be workable, predictable and compatible with maintaining a competitive industrial base in Europe.

As downstream users of materials covered by CBAM, many European manufacturing industries are already experiencing significant uncertainty regarding future costs, compliance obligations and contractual risks. Indeed, manufacturers are currently concluding sales contracts without knowing the future CBAM costs they will have to bear. This undermines legal certainty and exposes companies to significant financial risks that are difficult to hedge—particularly in an industry characterised by long lead times, bespoke projects and fixed price contracts. The Commission's proposal to extend the scope of CBAM to certain downstream products does not adequately address these concerns as it increases legal uncertainty for companies signing long-term contracts without clarity on future CBAM scope and costs.

In the context of the ongoing revision of the CBAM Regulation, the co-signatory associations jointly call on the European Institutions to postpone the implementation of CBAM obligations in order to allow sufficient time to conduct a robust and evidence-based assessment of impacts. Such an assessment is essential to ensure that CBAM achieves its climate objectives without negative consequences for EU industrial competitiveness, investment capacity and carbon leakage risks.

The proposed postponement would enable the Commission to gather empirical data from the transitional phase, evaluate administrative and compliance burdens and consider appropriate safeguards for downstream users before full financial implementation. This approach would fully reflect the Commission's Better Regulation principles and support a balanced and effective policy outcome.

We stand ready to engage constructively with the EU Institutions in this process. A measured and evidence-based approach is essential to ensure that Europe's climate ambition goes hand in hand with preserving its industrial capacity, jobs and global competitiveness.

CECE, the Committee for European Construction Equipment, represents the interests of 1,200 construction and mining equipment manufacturers through national trade associations in Europe. CECE members invest and innovate continuously to deliver equipment with highest productivity and lowest environmental impact. Efficiency, safety and high-precision technologies are key. See also www.cece.eu.

The European Garden Machinery Industry Federation – **EGMF** – has been the voice of the entire garden machinery industry in Europe since 1977. With 41 European corporate members and 7 National Associations representing manufacturers of garden, landscaping, forestry and turf maintenance equipment, we are the strongest network in this sector in Europe. For further information, please visit www.egmf.org.

FEM, the European Materials Handling Federation has represented European manufacturers of materials handling, lifting and storage equipment since it was founded in 1953. FEM currently consists of 15 members, 13 from the EU, as well as UK and Türkiye. In total, FEM represents more than 1,000 companies with about 160,000 employees, covering around 80% of all eligible European companies. It thus accounts for more than half of the world's total production. www.fem-eur.com