



Federation of the European
Sporting Goods Industry

FESI Position Paper

CBAM Consultation

On the expansion of
scope to
downstream
products

August 2025

SUMMARY

1. **Avoiding risk of misapplication**
2. **Excluding products in scope of 'Right to Repair'**
3. **Maintaining current de minimis mass threshold**

The Federation of the European Sporting Goods Industry (FESI) welcomes the opportunity to provide feedback on the consultation regarding a potential expansion of the Carbon Border Adjustment Mechanism (CBAM) to downstream products. FESI supports the European Union's objective to address carbon leakage and accelerate the transition to a low-carbon economy. However, for CBAM to be both effective and practicable, its scope and implementation must remain proportionate, avoid unintended effects, and recognise the operational realities of companies in the sporting goods sector.

To that end, we respectfully submit the following key concerns.

1. AVOIDING RISK OF MISAPPLICATION

- Companies have already experienced cases where national authorities requested CBAM registration for goods that are clearly outside the scope of the mechanism (e.g. transport cages used for logistics purposes).
- Such situations create confusion, divert resources, and generate unnecessary administrative burden for businesses that are not in fact subject to CBAM obligations. If the scope is extended to downstream products, this confusion could be exacerbated even further.

FESI recommends that the Commission provide clearer guidance to national authorities and operators to prevent misapplication and ensure that companies are not inadvertently caught up in CBAM compliance. If the scope is extended, an updated and clear list of goods in scope and goods not in scope need to be made available and authorities need to be well informed.

2. EXCLUDING PRODUCTS IN SCOPE OF ‘RIGHT TO REPAIR’

- If the scope of CBAM were to be extended to downstream products, there is a risk that goods imported as spare parts would inadvertently fall under its obligations.
- Including spare parts within CBAM would undermine key EU policy objectives, including the **Right to Repair** and the promotion of circular business models. Penalising companies for making spare parts available would discourage repair practices, shorten product lifetimes, and increase waste: outcomes that run directly counter to the European Green Deal.

FESI urges the Commission to ensure that, in the event of any extension of CBAM to downstream products, goods ordered as spare parts are explicitly excluded from its scope.

3. MAINTAINING CURRENT DE MINIMIS MASS THRESHOLD

- Maintaining the current de minimis threshold to exempt low mass imports is essential to ensure that the mechanism focuses on goods with significant carbon leakage risk, while avoiding disproportionate burdens on small consignments or low-volume operators.

FESI calls on the Commission to preserve scope thresholds as a necessary tool to ensure proportionality in CBAM’s application.

Conclusion

It is essential that the potential expansion of the CBAM scope to downstream products remains proportionate, clearly targeted, and consistent with other EU policy priorities. To this end, it is essential that:

- CBAM is not misapplied to goods outside its scope;
- Spare parts are explicitly excluded;
- Scope thresholds are maintained.

Clear guidance and consistent application will be critical to achieving CBAM's objectives while avoiding unintended consequences for companies and consumers.

Founded in 1960 FESI - the Federation of the European Sporting Goods Industry represents the interests of approximately 1.800 sporting goods manufacturers (85% of the European market) through its National member Sporting Goods Industry Federations and its directly affiliated companies. 70-75% of FESI's membership is made up of Small and Medium Sized Enterprises. In total, the European Sporting Goods Industry employs over 700.000 EU citizens and has an annual turnover of some 81 billion euro.

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