Validity Import license

For an AGRIM import licence (L001), the relevant EU import licensing rules (including Delegated Regulation (EU) 2016/1237 and Implementing Regulation (EU) 2016/1239) provide that **the import declaration can only be validly made by**:

- the holder of the licence (titular), or
- the transferee (cessionary), or
- a **customs representative acting on behalf of either of the above**.

If the terminal lodges the import declaration under its EIDR authorisation (**Entry in Declarant's Records**), it must do so in its own name as the declarant. This is incompatible with direct customs representation, because direct representation requires the declaration to be made in the name of the importer. Since EIDR is based on the authorisation holder's own simplified declaration in its records, the terminal cannot apply EIDR while at the same time acting as a direct representative for the importer. As a result, if the import licence (e.g. AGRIM) is to be used via a customs representative, the only r**emaining option** is for the terminal to act as an **indirect representative**.

This means that the terminal, acting in its own name but on behalf of the importer, becomes the declarant and assumes **joint liability** towards the customs authorities together with the importer of record, including responsibility for compliance with the licence conditions and any resulting customs debt.

By contrast, where the **normal declaration procedure** is used (i.e. not EIDR), **both direct and indirect representation remain possible**, allowing the declaration to be made either in the name of the importer (direct representation) or in the name of the representative (indirect representation).

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