

26 October 2013

Mr Mirosław Zielinski,
Director, Directorate A, DG TAXUD,
European Commission

RE: Partnership with the Trade Contact Group and implementation of the UCC

Dear Mr Zielinski,

The organisations associated to this letter are writing to you on a point of mutual interest which we would like to work urgently with you to address.

Our principal concern is for the Trade Contact Group (TCG) to function as effectively as possible in the task foreseen for it by the European Commission.

The TCG, as a platform for customs and trade consultations, has been established to enable economic operators to contribute to the development and implementation of customs related issues as effectively as possible. Unfortunately, in recent times it must be recognised that the TCG has not fulfilled this role as effectively as it could. We believe it is incumbent on the TCG and the European Commission to reflect on why this is the case and what changes must be made to rectify the situation.

To this end we would welcome the opportunity for a small delegation of TCG members to meet with you at the earliest opportunity to discuss the principles and working methods on which our partnership should be based. With the adoption of the Union Customs Code (UCC) there has never been a more important time for us to be sure that our forms of partnership and consultation are sufficiently credible and effective to ensure a modern, efficient and streamlined customs environment protecting the facilitation of legitimate trade as well as the Union's fiscal and security interests.

Moreover, with respect to the UCC and the adoption of its Implementing Provisions we would kindly request that the UCC Work Programme be presented at the next TCG meeting on 27 November 2013. In that presentation, we would like to learn more precisely the exact method and timing you envisage for industry consultation on the UCC delegated and implementing acts. We would hope this could include:

- the sequence of issues on which industry views will be sought;
- the duration, timing and format for industry consultation, including regular participation in the appropriate fora where the Delegated and Implementing Acts are being discussed with the Member States;
- the method and timing for putting all relevant documentation at the TCGs disposal;
- how industry views will be made available to Member States.

In short, we respectfully seek a detailed consultation programme to be outlined for discussion with the TCG prior to the publication of the draft UCC Delegated and Implementing Acts.

We request such a programme in order to better fulfil our responsibilities as members of the TCG and make a more effective contribution to the implementation of the UCC. It is

essential that this process takes full advantage of the business community's expertise on matters which once decided will determine our economic operator's daily customs processes, their competitiveness and ultimately the health of the European economy. We trust you will recognise in this letter our strongly held desire to work in effective partnership with you and your services in pursuit of these goals and we look forward to discussing with you how we may work jointly to concretely bring this about.

Yours sincerely,

