

AmCham EU comments on the definition of Exporter **20 January 2017**

The definition of Exporter from Art 1(19) of Regulation 2446/15 has been subject to numerous discussions amongst traders and customs administrations. The American Chamber of Commerce to the EU (AmCham EU) has been following (and will continue to follow) the debate very closely and is happy to accept the invitation to provide further comments to modify the definition to make it more clear both for traders and customs administrations. AmCham EU welcomes the proposed wording set forth in Document TAXUD/A2/FOR/2016/017 REV1 - EN published last December 14, 2016 where under point (a) the person established in the customs territory of the Union who has the power or is empowered (...).

In relation with point (a) AmCham EU is of the opinion that:

- 1) **'any** person established (...)' should be able to be empowered to act as exporter. Diverse business models with different actors, ranging from consignors, sellers, marketing companies, carriers, freight forwarders or other parties involved in exporting goods, should be eligible to be empowered to act as exporter
- 2) the empowerment should not be subject to any specific requirement.

AmCham EU speaks for American companies committed to Europe on trade, investment and competitiveness issues. It aims to ensure a growth-orientated business and investment climate in Europe. AmCham EU facilitates the resolution of transatlantic issues that impact business and plays a role in creating better understanding of EU and US positions on business matters. Aggregate US investment in Europe totaled more than €2 trillion in 2015, directly supports more than 4.3 million jobs in Europe, and generates billions of euros annually in income, trade and research and development.