To the attention of:

Philip Kermode
Director Directorate A – Customs policy, legislation, tariff
Directorate General for Taxation and Customs Union
B-1049 Brussels BELGIUM

Brussels, 6 April 2016

Subject: <u>Work Programme for the Union Customs Code - timelines for implementation</u>

Dear Mr Kermode,

From the very beginning of the establishment of the UCC Working Programme, Trade Contact Group (TCG) members have been highlighting the importance for businesses of having clear, transparent and coherent provisions and planning, including realistic timelines that takes into account the needs of trade as well, for the implementation of the various IT systems across the EU.

We expressed these concerns in writing most recently with your services responsible for this particular topic in the context of the WP 2015 review (TCG letter and respective reply attached).

We understand the constraints the Commission is facing, in particular when it concerns national IT systems, however we consider that it is only through documents such as the UCCWP and the engagement of the Commission and all MS's that harmonization, transparency and predictability for economic operators throughout the EU can be ensured. The ongoing lack of clarity with regard to national planning in MS's across the EU is still of a major concern for us and becomes even higher with the 1st May fast approaching and the business community yet receiving only fragmented information from MS's. The statement in the Commission's reply that "MS customs authorities will continue to do as they are already doing today, providing their trade community with the appropriate information and technical documentation in sufficient time to implement and test the changes before the go-live date" is therefore of no reassurance at all to us, in particular when recalling the situation in 2010-2011 with the implementation of the Customs Code's security amendments.

Given the importance of the issue we would like to request that a specific point on this subject is included, in the agenda for the next TCG Plenary meeting, scheduled for 20 April 2016. We would like in particular to receive clear information on when we can expect details of national planning programmes for MS's, including specific details regarding specifications (functional and technical), test environment and time periods for testing and possibilities for support, etc. for the various items listed in the UCCWP.

We remain convinced that such information is an essential element for a successful implementation, by customs authorities and by trade, of the Union Customs Code.

We thank you for your attention to this issue, and look forward to receiving your response.

Yours sincerely,

AEA – Association of European Airlines
AmCham EU – American Chamber of Commerce to the European Union
CECED – European Committee of Domestic Equipment Manufacturers
Cefic – European Chemical Industry Council
CLECAT – European Association for forwarding, transport, logistic and customs services
CLEPA – European Association of Automotive Suppliers
CONFIAD
DIGITALEUROPE
ECASBA – European Community Association of Ship Brokers and Agents
ECSA – European Community Shipowners' Associations
EEA – European Express Association
ESC – European Shippers' Council
ESIA – European Semiconductor Industry Association
EURATEX – European Apparel and Textile Confederation
EUROCHAMBRES –Association of European Chambers of Commerce and Industry
EuroCommerce
Eurometaux – European Association of Metals
EUROPRO
EurTradeNet – ETN
FEPORT – Federation of European Private Port Operators
FESI – Federation of the European Sporting Goods Industry
Foreign Trade Association
FuelsEurope
IATA – International Air Transport Association
IRU – International Road Transport Union
OCEAN – European Ship Suppliers Organization
TIACA – International Air Cargo Association
WSC – World Shipping Council

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