To the attention of:

Heinz Zourek Director-General Directorate General for Taxation and Customs Union European Commission

Brussels, 25 January 2013

Dear Mr. Zourek,

In both May and October of 2012, a large number of members of the Trade Contact Group, (TCG) wrote to the Commission to emphasise the importance of Centralised Clearance to business in Europe. The TCG members who have signed this letter believe that it is essential that the simplification related to centralised clearance is retained in line with the proposals in the original MCC. This principal has also been supported and adopted by the European Parliament.

Recently we were informed that the Commission has decided to create a working group 'to study concrete business cases for centralised clearance, as defined in the Union Customs Code, from the experience gained with SASP'. The TCG is, however, apparently not to be included in this working group.

The defined business of the working group still needs to be further clarified, but additional information offered to the ECG suggests that this initiative is welcome.

As partner of choice for the Commission, members of the TCG were disappointed to learn that only certain companies with a SASP licence are to be included in the group.

As you know, the TCG has been fully involved in the development of procedures and legislation for the Single Authorisation for Simplified Procedures (SASP) and also in the development of the proposed procedures and legislation for Centralised Clearance. Therefore we are puzzled and disappointed by this decision.

Given the restricted participation, we are concerned that the result may be simply a limited extension of the current SASP system and so would request that in order to maximize this opportunity the invitation is extended to a wider range of trade representatives. We believe that the involvement of TCG members together with SASP licence holders offers a far greater opportunity of ensuring the success of this working group, as it will provide an opportunity for the Member States and the Commission to learn from trade representatives why they have not yet applied for an SASP authorisation, and what changes they wish to see which would make it attractive to them to consider applying for Centralised Clearance.

We would therefore request that the composition of the working group be reconsidered <u>to</u> ensure that the interests of all business sectors are taken into account.

THE FOLLOWING ORGANISATIONS SUPPORT THIS LETTER:



American Chamber of Commerce to the European Union



Confederation of European Community Cigarette Manufacturers



European Chemical Industry Council



European Association for Forwarding, Transport, Logistics and Customs Services



Confiad Paneuropean Network for Customs Representation



European Community Shipowners' Associations



European Express Association



European Semiconductor Industry Association



European Shippers' Council



Association of European Chambers of Commerce



EuroCommerce



European Alliance of customs-related service providers



European Ship Suppliers Organization



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World Shipping Council