

Mr Stephen Quest
Director-General
Directorate-General for Taxation and Customs Union
European Commission
Rue Joseph II, 79 - 1000 Brussels

Brussels, 10 April 2020

Dear Mr Quest,

The COVID-19 global pandemic is placing unprecedented strains on European importers, exporters and the transport and logistics providers who facilitate the EU's internal and external trade. These strains are financial, operational and in many cases severe. Industry and commerce's ability to keep internal and external EU supply chains running determines whether our hospitals, supermarkets and homes are kept supplied and whether we retain in Europe the growth pathways which will enable our economies to recover once the COVID-19 crisis has passed.

Consequently we strongly support the emphasis placed by President von der Leyen on the importance of keeping industry supply chains open across the EU's internal and external borders and the efforts of different Directorates General to support the Green Freight Corridors approach. Understandably customs – perhaps more than ever – plays a vital role in these efforts.

We urge DG TAXUD to provide an active leadership role ensuring that customs authorities across the EU take the right steps to manage this crisis. We appreciate the guidance document issued on 30 March highlighting the derogations, exemptions and flexibility that already exists within the Union Customs Code (UCC). However, we need the EC to play a coordinating role, recommending that Member States take advantage of these possibilities and advising how this can be done in a similar manner and harmonised manner. Some Member States have implemented such measures, others have not. But a more uniform application of the Code and information gathered at EU level, concerning measures that individual Member States have taken is vital.

The trade bodies signing this letter welcome DG TAXUDs announcement of the duty and VAT relief on certain medical supplies, while noting the limited scope of this action. We also appreciate the initial guidance published on 30 March that was subsequently updated. However, while it is a first step to emphasise what provisions already exist in the UCC to help mitigate the impact of the crisis, we ask you to engage with trade representatives and Member States and be willing to consider solutions proposed that are outside of the existing legal framework. The Green Freight Corridor solution itself is an example of the proactive and innovative solutions required by a situation that is anything but business as usual. Moreover, the extent of this crisis and its potential consequences for our Union truly warrant that it becomes the single most important focus of DG TAXUD at this time.

Finally, we ask you to keep the trade community closely informed. The guidance that you issued was sent to Trade Contact Group members, but has been placed in a less than prominent part of DG TAXUD's website. Other DGs have set up dedicated and prominent COVID-19 information points on their websites, and we would urge you to do likewise. It should provide comprehensive information on actions taken by DG TAXUD and Member State customs authorities, so that industry can easily find out about the actions being taken. We would also strongly recommend that DG TAXUD sets up a virtual COVID-19 group with TCG members similar to the one that addressed concerns and shared information pertaining to Brexit. This will be important not just in the present crisis but also when the situation is more normal and businesses will need help to recover.

In conclusion we would ask you to please view the Trade Contact Group as an asset and a resource which is at your disposal, to help find solutions and to disseminate information to our member companies across Europe and across sectors. We appreciate the tremendous pressures that are faced by your services but we are committed to working with you to overcome this unprecedented challenge for the European Union and would be pleased to discuss our specific concerns and ideas further with you.

Yours sincerely,

