

DG TAXUD
European Commission
Rue Joseph II 79
1000 Brussels

Brussels, 19 December 2022

Subject: Request for an in-person TCG meeting in January 2023

Dear TCG Secretariat,

As representatives of the undersigned trade associations of the Trade Contact Group, we write to you to request an in-person TCG meeting in January 2023.

The dialogue between the European Commission and - Trade within the context of the TCG has in the past proven to be an effective platform to review and address concerns related to the UCC revision, the recommendation of the Wise Persons Group (WPG) report and the timeline for the implementation of the UCC work programme.

With the recent publication postponement of the -customs reform proposal by the European Commission, we are concerned about the lack of communication and exchange with your administration. As draft regulation develops, consideration could be given to more pilot projects as part of the process to test how a draft text or concept would work in practice. The results could then be analysed to give direction to ensure a final text is fit for purpose and robust in operation from day one. That would minimise needing to patch a rule after it is in force due to uneven application and interpretation.

Given the importance of a permanent dialogue in this critical phase of the reform we hope that an in-person TCG meeting can be planned for 26 January 2023.

We understand that DG TAXUD postponed the adoption of the customs reform proposal with the intention to present this to the Council and Parliament by Q1 2023.

Next TCG meetings are currently planned for January and April 2023. An in-person TCG meeting on the 26 January 2023 is therefore of great importance to ensure an adequate form of proper trade discussion and give economic operators the opportunity to meaningfully contribute to the proposal.

Consultation with industry about the means of achieving desired policy outcomes is as essential as the policy end-goal itself. This is where industry expertise and knowledge can prove most useful to regulators, in the design of measures tailored to achieve the EU's policy objectives. Within the TCG, our trade associations have subject matter experts from different Member States, that are well informed about the economic reality as well as the legal framework, with a vast experience of customs legislation as well as the supply chain. Our members are submitting most customs declarations in the European Union, as such they are critical to the health of EU Trade and provide a practitioner's perspective to this effort.

We urge the Commission to look at the members of the TCG as a resource that can contribute to a realistic plan for customs reform and follow a due diligence process in terms of trade consultation, to avoid further delays and uncertainty. We ask the Commission to organise an in-person TCG meeting in January 2023,

allowing the parties that will be subject to the new legislation sufficient opportunities to discuss the concept of the reform.

We would also like you to present the status on the UCC work program, including, amongst others, the scheduled deployments of AES/NCTS 5, NES and ICS2 Release 2 & 3. Furthermore, we would like to have a status overview of Centralized Clearance for Import.

We remain at your disposal for further clarification of the concerns expressed in this letter and look forward to an opportunity for a review at your earliest convenience.

Yours Sincerely,



Brendan Sullivan
Global Head of Cargo
IATA



Nicolette van der Jagt
Director General
CLECAT



Annette Meijer
Chair
European Express Association



Godfried Smit
Secretary General
European Shippers' Council



Damian Viccars
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Maite Miret
General Manager
EurTradeNet-ETN



Walter Van der Meiren
Chair
AmCham EU's Customs and Trade
Facilitation Committee

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A handwritten signature in blue ink, appearing to read 'B. Szebeny', is written over a faint, light blue horizontal line.

Botond Szebeny
Secretary General
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