



**THE EUROPEAN COMMUNITY ASSOCIATION OF
SHIP BROKERS AND AGENTS**

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Tuesday, 16 April 2013

Mr. Miroslaw Zielinski
Director Unit A, Customs Policy, Legislation and Tariff
Directorate General for Taxation and Customs Union
The European Commission
BRUSSELS

Dear Director Zielinski,

THE UNION CUSTOMS CODE

The European Community Association for Ship Brokers and Agents, ECASBA represents the ship agency and ship broking sectors in twenty two European Community and Applicant Member States and European Economic Area Members (Belgium, Bulgaria, Croatia, Cyprus, Denmark, Finland, France, Germany, Great Britain, Greece, Hungary, Ireland, Italy, Malta, the Netherlands, Norway, Poland, Portugal, Slovenia, Spain, Sweden and Turkey) and is an active participant in discussions with the European Commission and other institutions on all issues that affect the movement of goods around and within Europe by water.

As the organisation whose ship agent members are responsible for compliance with statutory ship reporting facilities, we maintain a very close interest in all policy actions that may affect the ability of our members to meet their obligations and clearly the ongoing and extensive discussions on reform of the European customs environment are of particular interest.

Given the breadth of our membership, there are understandable variations in the views of our members on some specific policy issues but we are all agreed that the introduction of an effective, modernised, harmonised customs reporting environment, focussed on the facilitation of trade, is vital in ensuring that Europe maintains its global competitiveness. To this end, therefore, we are in total agreement that the pace of reform of European customs legislation must be increased, that IT systems must also be upgraded, customs controls must operate on a risk-based strategy and that harmonisation and simplifications should be based on best practice. For a number of reasons however, our members are split on the introduction of Centralised Clearance so as an organisation we are unable to support its introduction. Setting that to one side however, we would reiterate and fully support industry's call for progress on customs reform to be made without further delay.

Whilst on the subject of amendments to European customs regulations, we would also take the opportunity to remind you that retention of guarantee waivers and existing Level 2 simplifications under the Union Customs Code is another particular concern for our members.

As you will recall, we recently wrote to yourself, as well as to the Chairman of Parliament's IMCO and RETT Committee, Commissioners and senior staff within DG-TAXUD and DG-MOVE, to express our support for reinstatement of those provisions to the Union Customs Code by means of the amendment to Article 77(6a) proposed by the Finnish Customs Authorities. This position is widely supported by many other Member States and our colleague associations in the European maritime sector.

In view of our support for urgent forward progress on European customs code development, we were disappointed to note that the trilogue was unable to reach agreement on 11th April and therefore that the discussions may once again be pushed back. As we have stated previously, the development of a coherent, effective, simplified and modernised European customs environment is vital to the continued efficient movement of goods to, from and around Europe and to enable the transport sector to play its part in driving forward Europe's economic development and we trust that this delay will only prove to be temporary.

We thank you for your attention.

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'Antonio Belmar da Costa', is written over a faint horizontal line.

ANTONIO BELMAR DA COSTA
CHAIRMAN