

European Commission
DG Taxation and Customs Union
Mr. W. Deffaa
Director General

cc.: Mr. M. Zielinski
Director Customs Policy

Brussels, August 24th 2010

Re: timeline for development of MCCIP's and supporting IT systems

Dear Mr. Deffaa,

The undersigned trade associations are writing to you to share our strongly felt belief that a customs system for the future should not be built under extreme time pressure.

The desire and commitment to meet the deadlines laid down in the Modernised Customs Code, is understandable, yet, in our opinion, it must not lead to interim, possibly unstable “solutions” only to be replaced, within a short time span, with new systems resulting in duplicated and redundant investments by traders and customs administrations .

Based on experience that was accumulated in the work that has been done so far, we are of the opinion that more time is needed to think through the procedures and processes to be automated, as well as the most appropriate IT architecture. A complete, comprehensive and viable systems architecture must be developed and approved before investments are made, IT systems are developed and implemented and new business processes are put in place. Continuing economic and budgetary constraints also demand that sustainable, prudent and well-documented priorities be agreed upon *before* investment decisions can be required to be made – by traders and public authorities.

In short - there must be assurance that investments in IT systems fit with, and be part of, the overall systems architecture. That assurance remains currently illusive.

The development of ICS/ECS taught us, as a result of its complex itinerary in a European Union with 27 Member States, that it is taking much longer than expected for the Member States and the traders to develop, implement and test their systems. Less than two and a half years separate the roll out of ICS phase 1 from the deadline for implementation of the AIS, which will be even much more challenging and complicated.

It is important that specifications for amending or building new IT systems are only made according to agreed and considered user requirements that have the support and confidence of all stakeholders.

Drafting and promulgation of the MCCIP should leave sufficient scope and time for the development of the supporting IT systems, including an analysis of possible shortcomings of the existing systems. We should not compromise the future of European economy with decisions taken under time pressure and possibly driven by the financial limitations dictated by the recent recession and the fragile recovery.

In view of the above, the undersigned associations recommend reviewing and revising the calendar for the implementation of the MCCIP to allow for a process that gives all the stakeholders an understanding of, and confidence in, the investments they will need to make in support of commonly shared objectives and priorities.

Thanking you for taking these views into consideration,

Yours sincerely,

The undersigned associations,

AEA (Association of European Airlines);
AmCham EU;
CEFIC (European Chemical Industry Council);
CER (Community of European Railway and Infrastructure Companies);
CLECAT (European Association for Forwarding, Logistic, Transport and Customs Services);
CONFIAD PanEuropeanNetwork;
Customs Platform;
ECASBA (European Community Association of Ship Brokers and Agents);
ECSA (European Community Shipowners' Associations);
EEA (European Express Association);
EECA-ESIA (European Semiconductor Industry Association);
ESC (European Shippers' Council);
Eurocommerce;
EurTradeNet;
FEPORT (Federation of European Private Port Operators);
FTA (Foreign Trade Association);
IATA (International Air Transport Association);
IRU (International Road Transport Union);
LTR Industries
OCEAN (European Ship Suppliers Organization);
WSC (World Shipping Council)