

Mr Walter Deffaa Director General European Commission DG Taxation and Customs Union B-1049 Brussels

24 March 2011

Dear Mr. Deffaa, Dear Waller,

BUSINESSEUROPE is following very closely and has engaged actively in the discussions on the Modernised European Customs Code (MCC) and its related implementing provisions (MCCIP), both through submission of very detailed position papers on the different MCCIP drafts and via its participation in the Trade Contact Group (TCG). A revised European customs code that significantly facilitates customs procedures will contribute significantly to reducing the administrative and financial burden on European companies.

We have discussed with our members the two different options on the application of the MCC and MCCIP that were presented during the TCG meeting on 15 March. BUSINESSEUROPE supports option 2, which proposes a postponement of its application. Option 1, i.e. without an application of new IT systems, would not deliver on the stated objectives of the MCC and MCCIP, notably as IT supported customs functions are crucial today for smooth import and export procedures. Modern and trade supportive European customs procedures, including efficient IT systems, are a key element in maintaining the European Union's attractiveness as a location for trade and investment into the future. The reform of the current EU customs regime should therefore be conducted without the pressure of the current tight implementation timetable.

I would be grateful if you could also share BUSINESSEUROPE's support for option 2 with representatives from EU member states. We look forward to continuing our cooperation on this important matter in the future.

Les repards, the Lippe

Yours sincerely,

Philippe de Buck