



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

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Dear Mr Deffaa, *Dear Walter*

BUSINESSEUROPE supports the system of centralised clearance as defined in the Modernised Customs Code (MCC). This is the ability to lodge all customs declarations against one single customs office of supervision (COS), regardless of where the goods are presented to customs. In theory, centralised clearance therefore offers a great possibility for companies to centralise all customs affairs within the EU.

However, as the Modernised Customs Code's implementing provisions have not been adopted, the system is not yet applicable. An EU enterprise which currently wants to centralise needs to obtain a SASP (single authorisation for simplified procedures). These authorisations are burdensome and do not offer a structural approach to centralised clearance.

In the ongoing discussion with member states on how to apply centralised clearance, the Commission has proposed four different options for how to lodge a customs declaration: (1) Standard (full) declaration; (2) Simplified declaration; (3) Declaration through Entry in the Records (EIR) with notification; (4) Declaration through Entry in the Records (EIR) with a waiver for notification.

The combination of Centralised Clearance and Entry in the Records is a desired and advanced form of trade facilitation. It allows for the release of goods by an entry in the records containing a minimum number of data (summary declaration). BUSINESSEUROPE therefore calls for all four options to lodge a customs declaration to be kept available for operators. This ensures minimal interruption of the supply chain and provides opportunities for the importer to optimise the use of economic customs regimes and exemptions.

Yours sincerely,

Best wishes
Philippe

Philippe de Buck