



Consultation: EU Single Window environment for customs

January 2019

Danish Shipping would like to thank the Commission for the opportunity to provide consultative remarks, in relation to the public consultation on the EU Single Window environment for customs.

Within that context, Danish Shipping would like to provide the following input:

In the light of the fast growing exchange of goods across the borders Danish Shipping believes it is important to simplify customs reporting and reduce non-tariff trade barriers. The increase of trade flows and regulatory requirements call for a modernized and a more efficient EU customs clearance procedure.

Danish Shipping is overall positive towards the inception impact assessment as it points to the importance of a simple and harmonised environment for customs declaration. Today there exist different customs reporting and notification requirements between Member States. This imposes administrative burdens on all participants in European trade. Thus there is a great opportunity for simplification and standardisation of regulatory and non-regulatory elements within the EU just as the inception impact assessment underlines.

The inception impact assessment correctly identifies several important objectives that together would be a step in the right direction towards frictionless trade at the EU borders.

The separate controls for customs and phyto-sanitary / veterinary is a particular issue for our members. These controls are separated in time and place. The phyto-sanitary inspections are insufficiently digitalized and involve in most EU MSs a stop of the cargo which is an obstacle to fluidity. The costs relating to these checks are also significant. More effort has to come from the EU to propose improvements including merging and harmonising of phyto-sanitary controls.

It is important for the industry that the EU Single Window environment for customs only has one entry-point for the declarants across all borders in the Union. The action must be taken on EU level to ensure harmonization of data and interoperability of data submission, processing, exchange and checking of information. The solution should also ensure the



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“reporting once”-principle which is needed in order to reduce administrative burdens.

An EU Single Window environment for customs should establish a genuine Customs Union within the EU. Such a comprehensive and coherent Single Window environment for customs would reduce administrative burdens and costs faced by participants in the logistic chain and government administrations. Therefore Danish Shipping ultimately calls for a solution that goes further than suggested in the inception impact assessment. An EU Single Window environment for customs must allow exchange of data with multiple authorities through common IT interfaces, harmonised submission processes, and maximum reuse of data.

A Single Window environment for customs should include entry and exit formalities for customs required when bringing goods into and out of the Union. Thus the following reporting obligations should be included within an EU Single Window environment for customs: Arrival Notifications (AN), Presentation Notifications (PN), Temporary Storage Declarations (TSD), Re-export Notifications and Exit Summary Declarations (EXS).

Data requirements within the above mentioned reporting obligations have been harmonised in the Union Customs Code (UCC). Unfortunately the UCC has not harmonised the B2G transmission (IT architecture, message formats, data structure). The EU Single Window for Customs should coexist with other UCC single interfaces, e.g. STI (ICS2), the Customs Decisions and Generic Trader Portals).

Therefore Danish Shipping believes that an EU level shared trader interface including also the above mentioned reporting obligations would be the optimal solution as it would reduce administrative burdens for the industry and be beneficial not only for the participants in the logistic chain but for the European economy as a whole. Any initiative that brings us closer to a true Single Window for customs should be seen as a step in the right direction.

Kind regards

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