

Interim evaluation of the Union Customs Code (UCC)

Fields marked with * are mandatory.

Introduction

Established in 1968, the **Customs Union** is an essential pre-condition for the free circulation of goods within the EU, without which the single market would be impossible. The Customs Union is also one of the few exclusive competences of the Union. This means that customs legislation is adopted at EU level, although its implementation is the responsibility of the Member States via their national customs administrations.

The **Union Customs Code (UCC)** is the main EU legislative framework for customs, replacing the previous Community Customs Code (CCC). The main specific aims of the UCC are to (1) streamline and simplify customs rules, procedures and processes; (2) achieve a fully paperless environment; and (3) strengthen legal certainty and predictability of customs rules.

The UCC was adopted in October 2013. Since then, the European Commission has also adopted a number of legal acts to supplement the provisions of the UCC, set procedural rules for its implementation, and define a Work Programme for the development and deployment of a set of electronic systems. The UCC's substantive provisions are being applied since May 2016, but certain aspects are subject to transitional rules until the upgrade / development of the relevant IT systems is complete. More information on the **UCC legal and IT package** and its state of implementation is available [here](#).

In a 2018 report ([available here](#)) to the European Parliament and to the Council, the European Commission committed to carrying out, by 2021, an interim evaluation of the UCC legal framework and the electronic systems implemented by that date. The **aim of this consultation** is to gather the views and experiences of interested parties (including businesses, individuals, customs authorities, and other stakeholders) regarding the UCC and its implementation, so that these can be used to inform the conclusions of the interim evaluation, and help to identify ways to improve the functioning of the UCC.

A summary of the responses to this consultation will be published on the Better regulation portal after the end of the consultation period.

About you

We would like to know who you are to better understand your views, expectations and needs in relation to customs processes in the EU.

* Language of my contribution

- Bulgarian
- Croatian

- Czech
- Danish
- Dutch
- English
- Estonian
- Finnish
- French
- German
- Greek
- Hungarian
- Irish
- Italian
- Latvian
- Lithuanian
- Maltese
- Polish
- Portuguese
- Romanian
- Slovak
- Slovenian
- Spanish
- Swedish

* I am giving my contribution as

- Academic/research institution
- Business association
- Company/business organisation
- Consumer organisation
- EU citizen
- Environmental organisation
- Non-EU citizen
- Non-governmental organisation (NGO)
- Public authority
- Trade union
- Other

* First name

Anu

* Surname

Kultalahti

* Email (this won't be published)

anu.kultalahti@finnwatch.org

* Organisation name

255 character(s) maximum

Finnwatch

* Organisation size

- Micro (1 to 9 employees)
- Small (10 to 49 employees)
- Medium (50 to 249 employees)
- Large (250 or more)

Transparency register number

255 character(s) maximum

Check if your organisation is on the [transparency register](#). It's a voluntary database for organisations seeking to influence EU decision-making.

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* Country of origin

Please add your country of origin, or that of your organisation.

- | | | | |
|-------------------------------------|--|-------------------------------------|--|
| <input type="radio"/> Afghanistan | <input type="radio"/> Djibouti | <input type="radio"/> Libya | <input type="radio"/> Saint Martin |
| <input type="radio"/> Åland Islands | <input type="radio"/> Dominica | <input type="radio"/> Liechtenstein | <input type="radio"/> Saint Pierre and Miquelon |
| <input type="radio"/> Albania | <input type="radio"/> Dominican Republic | <input type="radio"/> Lithuania | <input type="radio"/> Saint Vincent and the Grenadines |
| <input type="radio"/> Algeria | <input type="radio"/> Ecuador | <input type="radio"/> Luxembourg | <input type="radio"/> Samoa |

- American Samoa
- Andorra
- Angola
- Anguilla
- Antarctica
- Antigua and Barbuda
- Argentina
- Armenia
- Aruba
- Australia
- Austria
- Azerbaijan
- Bahamas
- Bahrain
- Bangladesh
- Barbados
- Belarus
- Belgium
- Belize
- Benin
- Bermuda
- Bhutan
- Bolivia
- Egypt
- El Salvador
- Equatorial Guinea
- Eritrea
- Estonia
- Eswatini
- Ethiopia
- Falkland Islands
- Faroe Islands
- Fiji
- Finland
- France
- French Guiana
- French Polynesia
- French Southern and Antarctic Lands
- Gabon
- Georgia
- Germany
- Ghana
- Gibraltar
- Greece
- Greenland
- Grenada
- Macau
- Madagascar
- Malawi
- Malaysia
- Maldives
- Mali
- Malta
- Marshall Islands
- Martinique
- Mauritania
- Mauritius
- Mayotte
- Mexico
- Micronesia
- Moldova
- Monaco
- Mongolia
- Montenegro
- Montserrat
- Morocco
- Mozambique
- Myanmar /Burma
- Namibia
- San Marino
- São Tomé and Príncipe
- Saudi Arabia
- Senegal
- Serbia
- Seychelles
- Sierra Leone
- Singapore
- Sint Maarten
- Slovakia
- Slovenia
- Solomon Islands
- Somalia
- South Africa
- South Georgia and the South Sandwich Islands
- South Korea
- South Sudan
- Spain
- Sri Lanka
- Sudan
- Suriname
- Svalbard and Jan Mayen
- Sweden

- Bonaire Saint Eustatius and Saba
- Bosnia and Herzegovina
- Botswana
- Bouvet Island
- Brazil
- British Indian Ocean Territory
- British Virgin Islands
- Brunei
- Bulgaria
- Burkina Faso
- Burundi
- Cambodia
- Cameroon
- Canada
- Cape Verde
- Cayman Islands
- Central African Republic
- Chad
- Chile
- China
- Christmas Island
- Guadeloupe
- Guam
- Guatemala
- Guernsey
- Guinea
- Guinea-Bissau
- Guyana
- Haiti
- Heard Island and McDonald Islands
- Honduras
- Hong Kong
- Hungary
- Iceland
- India
- Indonesia
- Iran
- Iraq
- Ireland
- Isle of Man
- Israel
- Italy
- Nauru
- Nepal
- Netherlands
- New Caledonia
- New Zealand
- Nicaragua
- Niger
- Nigeria
- Niue
- Norfolk Island
- Northern Mariana Islands
- North Korea
- North Macedonia
- Norway
- Oman
- Pakistan
- Palau
- Palestine
- Panama
- Papua New Guinea
- Paraguay
- Switzerland
- Syria
- Taiwan
- Tajikistan
- Tanzania
- Thailand
- The Gambia
- Timor-Leste
- Togo
- Tokelau
- Tonga
- Trinidad and Tobago
- Tunisia
- Turkey
- Turkmenistan
- Turks and Caicos Islands
- Tuvalu
- Uganda
- Ukraine
- United Arab Emirates
- United Kingdom

- Clipperton
- Cocos (Keeling) Islands
- Colombia
- Comoros
- Congo
- Cook Islands
- Costa Rica
- Côte d'Ivoire
- Croatia
- Cuba
- Curaçao
- Cyprus
- Czechia
- Democratic Republic of the Congo
- Denmark
- Jamaica
- Japan
- Jersey
- Jordan
- Kazakhstan
- Kenya
- Kiribati
- Kosovo
- Kuwait
- Kyrgyzstan
- Laos
- Latvia
- Lebanon
- Lesotho
- Liberia
- Peru
- Philippines
- Pitcairn Islands
- Poland
- Portugal
- Puerto Rico
- Qatar
- Réunion
- Romania
- Russia
- Rwanda
- Saint Barthélemy
- Saint Helena Ascension and Tristan da Cunha
- Saint Kitts and Nevis
- Saint Lucia
- United States
- United States Minor Outlying Islands
- Uruguay
- US Virgin Islands
- Uzbekistan
- Vanuatu
- Vatican City
- Venezuela
- Vietnam
- Wallis and Futuna
- Western Sahara
- Yemen
- Zambia
- Zimbabwe

The Commission will publish all contributions to this public consultation. You can choose whether you would prefer to have your details published or to remain anonymous when your contribution is published. **For the purpose of transparency, the type of respondent (for example, 'business association, 'consumer association', 'EU citizen') country of origin, organisation name and size, and its transparency register number, are always published. Your e-mail address will never be published.** Opt in to select the privacy option that best suits you. Privacy options default based on the type of respondent selected

* Contribution publication privacy settings

The Commission will publish the responses to this public consultation. You can choose whether you would like your details to be made public or to remain anonymous.

Anonymous

Only organisation details are published: The type of respondent that you responded to this consultation as, the name of the organisation on whose behalf you reply as well as its transparency number, its size, its country of origin and your contribution will be published as received. Your name will not be published. Please do not include any personal data in the contribution itself if you want to remain anonymous.

Public

Organisation details and respondent details are published: The type of respondent that you responded to this consultation as, the name of the organisation on whose behalf you reply as well as its transparency number, its size, its country of origin and your contribution will be published. Your name will also be published.

I agree with the [personal data protection provisions](#)

* On average, how frequently are you involved in customs operations, procedures and/or declarations?

This can be in any professional or private capacity, e.g. as a trader, customs agent, customs official, policy maker / legislator, researcher, consumer, etc.

- Daily or almost daily
- One or more times a month
- Less than once a month
- Never

* How familiar are you with the Union Customs Code?

- I have detailed knowledge of parts or all of the UCC
- I have intermediate knowledge of parts or all of the UCC
- I have basic knowledge of parts or all of the UCC
- I have very limited or no knowledge of the UCC

Overall views of the UCC

As of today, what are your (or your organisation's) most important needs and priorities regarding EU customs rules and processes?

	Very important	Quite important	Somewhat important	Not very important	Not important at all	Don't know
* Clearer, more predictable customs rules and processes	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* More uniform customs rules and processes across the different EU Member States	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Greater stability of customs rules (to limit adaptation costs)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* More effective exchange of information between national customs administrations and economic operators	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* More effective tools to tackle smuggling, illicit or fraudulent trade	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Better enforcement of EU safety, health and environmental rules at the external border	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

* Faster customs processes and procedures	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Simpler customs processes and procedures	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Better adaptation of customs rules and processes to new global, commercial or socio-economic developments and circumstances	<input checked="" type="radio"/>	<input type="radio"/>				
* More financial and/or human resources to enable customs authorities to do their job	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Other (please specify)	<input checked="" type="radio"/>	<input type="radio"/>				

Other (please specify)

100 character(s) maximum

UCC Article 12 needs to be amended to clarify that data on trade parties is not confidential.

In your opinion, are these needs more or less important today than they were in 2013, when the UCC was adopted?

	Much more important	A little more important	About the same	A little less important	Much less important	Don't know
* Clearer, more predictable customs rules and processes	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* More uniform customs rules and processes across the different EU Member States	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Greater stability of customs rules (to limit adaptation costs)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* More effective exchange of information between national customs administrations and economic operators	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* More effective tools to tackle smuggling, illicit or fraudulent trade	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Better enforcement of EU safety, health and environmental rules at the external border	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

* Faster customs processes and procedures	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Simpler customs processes and procedures	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* More financial and/or human resources to enable customs authorities to do their job	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Other (please specify)	<input checked="" type="radio"/>	<input type="radio"/>				

Other (please specify)

100 character(s) maximum

Public access to customs data can help making new regulations on due diligence more effective.

Please briefly describe your main needs regarding EU customs rules and processes, and if and how these have changed in the period 2013-2020.

2000 character(s) maximum

As a civil society organisation working on business and human rights, we need access to customs data on trade parties to better investigate human rights abuses in global supply chains, defend the rights of stakeholders, facilitate redress and remedies for victims, monitor companies' practices and hold companies accountable in case of human rights violations.

Customs data on trade parties is, however, not generally available to the public. This is why the UCC Article 12 needs to be amended to clarify that customs data on trade parties is not considered confidential by any of the MSs, and that such data can be disclosed to the public.

Expanding the range of customs data collected by the MSs' customs authorities to include the name and address of manufacturer and exporter (when it is not the manufacturer) would be an additional important avenue to achieve above-mentioned goals. This requires changes to the UCC Delegated Act.

The period 2013-2020 brought major developments regarding regulations on global supply chains. The EU Timber Regulation and the Conflict Minerals Regulation created new due diligence obligations for union importers. In both these regulations, competent authorities rely in part on "substantiated concerns" provided by external stakeholders ("third parties") to strengthen their monitoring and checks on compliance. Improving the quality and access to customs data would support third parties in raising such substantiated concerns. Horizontal due diligence obligations as well as sectoral rules (batteries, deforestation) are currently being prepared. Their effectiveness is also likely to improve with greater access public to customs data on trade parties.

Furthermore, since supply chains do not end at EU borders, it should also be made mandatory for customs authorities to collect and make publicly available information on trade parties on EU internal trade. This would allow tracking goods that have been released for free circulation.

In your view, how much progress did customs in the EU make towards the following objectives since the UCC entered into force (2016-2020)?

	Significant progress	Some progress	Very little progress	No progress	Don't know
* Streamline and simplify customs rules, procedures and processes	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Strengthen legal certainty and predictability of customs rules	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

* Achieve a fully paperless environment (by ensuring all customs declarations and operations can be made electronically)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Protecting the financial interests of the EU and its Member States (by ensuring the correct collection of customs duties)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Protecting the EU from unfair and illegal trade (e.g. by seizing counterfeit goods)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Ensuring the security and safety of the EU and its residents (e.g. by stopping imports of dangerous goods)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Facilitating legitimate trade and supporting legitimate business activity (by making customs procedures as fast and efficient as possible for trustworthy operators)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

To what extent did the UCC and its implementation to date contribute to progress towards these objectives?

	UCC contributed a lot	UCC contributed to some extent	UCC contributed a little	UCC did not contribute at all	Don't know
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* Streamline and simplify customs rules, procedures and processes	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Strengthen legal certainty and predictability of customs rules	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Achieve a fully paperless environment (by ensuring all customs declarations and operations can be made electronically)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Protecting the financial interests of the EU and its Member States (by ensuring the correct collection of customs duties)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Protecting the EU from unfair and illegal trade (e.g. by seizing counterfeit goods)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Ensuring the security and safety of the EU and its residents (e.g. by stopping imports of dangerous goods)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

* Facilitating legitimate trade and supporting legitimate business activity (by making customs procedures as fast and efficient as possible for trustworthy operators)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
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Do you agree or disagree with the following statements on the *design* of the UCC legal and IT package?

	Strongly agree	Tend to agree	Neither agree nor disagree	Tend to disagree	Strongly disagree	Don't know
* The structure of the UCC legal and IT package, including division of content across legal acts and data annexes, is <u>user-friendly</u>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* The provisions of the UCC legal and IT package are <u>clear and understandable</u>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* The UCC legal and IT package, including its periodic amendments, is <u>visible and well-communicated</u>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

* As a whole, the UCC legal and IT package provides a <u>coherent framework</u> for the regulation of customs activities and related IT developments	<input type="radio"/>	<input checked="" type="radio"/>				
* The UCC legal and IT package is an <u>improvement</u> over its predecessor (the Community Customs Code)	<input type="radio"/>	<input checked="" type="radio"/>				

Do you agree or disagree with the following statements on the *implementation* of the UCC legal and IT package?

	Strongly agree	Tend to agree	Neither agree nor disagree	Tend to disagree	Strongly disagree	Don't know
* The UCC rules and provisions are <u>applied</u> in a uniform way by the customs authorities of the different EU Member States	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* The national customs administrations and the European Commission <u>cooperate effectively</u> regarding the implementation of the UCC	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Economic operators have sufficient opportunities to <u>express their views regarding the implementation</u> of the UCC	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

<p>* Sufficient activities (e. g. seminars, consultations, guidance, training) have been carried out to <u>help economic operators</u> prepare for and comply with the UCC changes</p>	<input type="radio"/>	<input checked="" type="radio"/>				
<p>* The current allocation of <u>responsibilities for the UCC IT systems</u> between national customs administrations and the European Commission is appropriate</p>	<input type="radio"/>	<input checked="" type="radio"/>				
<p>* The <u>pace of progress</u> with the development and deployment of the UCC IT systems has been satisfactory</p>	<input type="radio"/>	<input checked="" type="radio"/>				

What do you consider to be the main achievement, improvement or positive impact of the UCC to date?

2000 character(s) maximum

What do you consider to be the main challenge or disappointment with the UCC and /or its implementation to date?

2000 character(s) maximum

Despite several civil society requests and a resolution in the European parliament (2016/2301(INI)) there still is no public access to customs information. This represents a major disappointment. Transparency in global supply chains plays an important role in building consumer confidence, monitoring corporate conduct and helping victims pursue redress for corporate abuses. And while some countries, namely the USA, India, Brazil and Colombia successfully collect and disclose in some form customs data that can be used by civil society organisations in their work, the EU and its MSs still lag behind.

How consistent is the UCC legal framework with EU policies in other fields? Are there any inconsistencies, conflicts or tensions with the relevant Commission priorities for 2019-2024?

	Very consistent	Mostly consistent	Partly consistent	Not very consistent	Not consistent at all	Don't know
* <u>A European Green Deal</u> : Europe aims to be the first climate-neutral continent by becoming a modern, resource-efficient economy	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* <u>A Europe fit for the digital age</u> : The EU's digital strategy will empower people with a new generation of technologies	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* <u>An economy that works for people</u> : The EU must create a more attractive investment environment, and growth that creates quality jobs, especially for young people and small businesses	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* <u>A stronger Europe in the world</u> : The EU will strengthen its voice in the world by championing multilateralism and a rules-based global order.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

If you see any significant inconsistencies between the UCC and other EU policies or Commission priorities, please briefly explain them.

1000 character(s) maximum

Following the Communication on “The European Green Deal”, the Commission is expected to issue a legislative proposal on horizontal mandatory human rights and environmental due diligence (mHREDD) in 2021.

Engagement with third parties and transparency leads to improved due diligence processes. Public access to better quality customs information would facilitate such engagement and monitoring work. In addition, based on existing due diligence legislation (see above), it is likely that the future mHREDD legislation will include a possibility for third parties to raise concerns to competent authorities, thus supporting them in their monitoring. In this context, public access to customs data is a crucial complementary measure. Without it, there is a risk that the EC’s reform on mHREDD will have a limited impact and will not reach its objective of building global sustainability.

Adaptation to changes and future UCC implementation

How well is the UCC legal and IT package able to deal with the following kinds of changes that affect customs in the recent past and foreseeable future?

	Very well	Quite well	Fairly well	Not very well	Not well at all	Don't know
* The Covid-19 pandemic and its social and economic consequences	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
* The withdrawal of the UK from the EU (Brexit)	<input type="radio"/>	<input checked="" type="radio"/>				
* Global geopolitical developments (e. g. new trade agreements, commercial disputes, punitive tariffs, etc.)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
* New business models and technologies (e.g. e-commerce, 3D printing, blockchain, etc.)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

* Other (please specify)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
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Other (please specify)

1000 character(s) maximum

The UCC (and IT) legal packages are not suited to deal with the ongoing changes affecting customs, in particular when it comes to the new regulatory frameworks on human rights and environmental due diligence and corporate accountability.

As the EU is set to reform sustainable corporate governance, it will develop mandatory human rights and environmental due diligence. Official reports and statements from the European Parliament and Commissioners also show an appetite to develop new rules on import controls to ensure no products and services made through forced labour can enter the EU market.

In order to support the implementation of such legal developments, the UCC legal package needs to be amended and include improved collection of data and ensure data on trade parties, exporters and manufacturers, is not considered as confidential by any of the MSs but can be disclosed publicly.

In your view, should any of the following be amended or revised in the foreseeable future to ensure the effectiveness of the UCC?

	Major changes needed	Moderate changes needed	Minor changes needed	No changes needed	Don't know
* The UCC legal package	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* The UCC IT package	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

Please briefly explain what changes (if any) you believe are needed to facilitate the effective implementation and application of the UCC legal and IT package.

2000 character(s) maximum

The changes needed to facilitate the effective implementation and application of the UCC legal and IT package, as well as its impact on other Commission's priorities are threefold:

1. the UCC legal package need to be amended to ensure that all companies that import goods into the EU are required to disclose exporter and the names and address of the manufacturers to the relevant customs authorities.
2. the UCC legal package (Article 12) need to be amended to clarify that customs data on trade parties, exporters and manufacturers, is not confidential by any of the MSs and can be disclosed publicly
3. in addition, changes are needed to allow for the tracking of goods within the internal market. EU MSs already collect a very limited set of company-specific data on EU internal trade. By extending the data elements to cover trade parties and making this data available to the public it would be possible to track down where (into which EU MSs) and by whom the goods are imported after they are released for free circulation in the first point of entry to the EU single market.

Useful links

[Union Customs Code UCC - information \(https://ec.europa.eu/taxation_customs/business/union-customs-code/uc-introduction_en\)](https://ec.europa.eu/taxation_customs/business/union-customs-code/uc-introduction_en)

[UCC implementation report \(https://ec.europa.eu/taxation_customs/sites/taxation/files/docs/body/22012018_report_implementation_ucc_en.pdf\)](https://ec.europa.eu/taxation_customs/sites/taxation/files/docs/body/22012018_report_implementation_ucc_en.pdf)

Contact

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