EUROPEAN COMMISSION
DIRECTORATE-GENERAL
TAXATION AND CUSTOMS UNION
Digital delivery of Customs and Taxation
Customs Tariff

Brussels

MINUTES

CUSTOMS PROGRAMME

CLEN ACTION 6

EUROPEAN CUSTOMS INVENTORY OF CHEMICAL SUBSTANCES

Update and Enrichment of ECICS

10 December 2024, video conference

CPG/008/044

Version December 2024
Approved by the meeting participants
Approved by COM

1. Approval of the agenda

Welcome

The Meeting on the Update and Enrichment of ECICS was held on 10 December 2024, as a video conference via Webex. The participants were welcomed to the meeting by the Chairman.

The **meeting agenda** was adopted as follows:

1. Welcome and adoption of the agenda
2. General information about ECICS - short update and current issues
3. ECICS anniversary - lessons learned
4. MS consultations on ECICS
5. Working Group on Derivatives on Chapter 29
6. WCO Scientific Sub-Committee
7. Pending cases for classification - discussion on specific cases
8. Any other business
9. Closure of the meeting

2. Nature of the meeting

The video conference was organized by COM as part of the CLEN Action 6 ECICS activities. The purpose of the meeting was to review recent steps taken to update ECICS and to reach a consensus on the next steps for its continued development.

The online meeting was not public. 39 participants attended from 20 EU Member States (MS), 3 Candidate countries, COM and 1 contractor.

The list of participants is provided in Section 7.

3. List of points discussed

3.1 General information about ECICS - short update and current issues

- **ECICS database statistics update**

The meeting started with a presentation on the latest statistics of the ECICS database. COM provided an overview of the database structure and usage trends. ECICS is divided into two parts: the **public database** and the **restricted database**. The public database currently contains over 70 000 chemicals and approximately 70 000 more in the restricted database. The classification of chemicals in the restricted database is still pending, hence the fact they are not yet publicly available.

Up to date, the public ECICS has recorded over **42 million hits in 2024**, a notable increase compared to the previous year. This rise in usage is largely attributed to the searches related to the legal obligation of CUS codes.

COM explained that there is an increasing number of emails received in the ECICS functional mailbox from economic operators requesting information on products that are already publicly available in the database. In response to this, the FAQ and Help sections of the database have been updated to better explain how to browse the database efficiently.

- **Development of e-learnings**

COM informed the participants that an **e-learning training tool for the public ECICS** is currently being developed. This tool aims to address common issues often faced by users, such as searching with incorrect codes or names. The e-learning module is expected to be **available by spring 2025** and will provide guidance on how to search the database more efficiently, along with tips on how to fill the search fields.

In addition, COM outlined plans for the development of a separate **e-learning module** designed specifically for users of the **restricted ECICS**. This module will focus on **how to introduce new products into the ECICS system** and is scheduled **for development next year**.

Both these initiatives reflect COM's ongoing efforts to enhance the user experience and improve the overall functionality of the ECICS system.

It was also remarked that the ECICS database is designed to be user-friendly and accessible to a wide range of users, meaning that **no specialized background in chemistry is required** to navigate and use the system effectively.

- **ECICS functional mailbox**

COM explained receiving an **increasing number of emails** in the ECICS functional mailbox taxud-dds-ecics@ec.europa.eu. These emails are mostly originating from economic operators asking for the tariff classification of a substance or the CUS code of a product. Some emails also point out potential mistakes in classification.

- **Survey results**

A survey on the use of the database was conducted between February and July 2024. The objectives were to gather feedback from users and understand which information users were the most interested in. All users were encouraged to answer, even if not using the database on a regular basis. The link of the survey was placed visibly in the top box on the main page of the database.

COM shared the main results of the survey. More than a hundred responses were received, mostly from economic operators. Overall, users expressed high satisfaction with the database and appreciated in particular its clarity and ease of use. However, they also provided suggestions for improvement:

- Expanding the number of chemicals available,
- Including links to regulations or other relevant databases,
- Including the option to export results.

COM acknowledged these concerns and will see how they can be addressed in future developments of the database.

3.2 ECICS anniversary – lessons learned

COM recalled the **50th Anniversary celebration of ECICS**, which was held in **November 2024.** The event was organized in collaboration with the Independent Authority for Public Revenue (IAPR) and the General Chemical State Laboratory (GCSL). The event provided an opportunity to reflect on the history and achievements of ECICS, as well as to explore ways to improve and expand it in the future.

COM and several MS thanked again **the hosting country** for having hosted the event, commending the excellent organization and emphasizing the event's value as an opportunity for MS to engage on key issues.

The event also served as a platform for **economic operators to share their feedback** on the database, providing valuable insights into how the system is used in practice. It was emphasized that **involving economic operators is crucial**, as their feedback helps align standards, encourage collaboration, and improve the ECICS database.

Participants present in ECICS anniversary event highlighted the usefulness of the three break-out sessions for providing a focused environment that facilitated **in-depth discussions** on specific topics, which are often overlooked in larger plenary meetings. These smaller groups allowed for meaningful exchanges and a more structured approach to complex issues.

In-person meetings allowed participants to share experiences and tackle common challenges, particularly regarding the classification of chemicals of HS Chapter 29.

Some Member States suggested **involving experts from related fields**, like chemical legislation, to broaden perspectives. Enhancing **collaboration with external databases**, such as the ECHA database, would create synergies and improve outcomes. They also recommended retaining breakout sessions for real dialogue and regular collaboration with external entities.

In response to a Member State's inquiry, COM highlighted that the **secure ECICS** allows users to search by CN, CAS, or CUS code, as well as perform structural **searches based on chemical bonds**, such as those involving carbon, nitrogen, and sulphur. These functionalities are designed to enhance chemical classification by enabling comparisons with similar structures.

Member States asked for access to the restricted ECICS. COM responded that any **MS wishing to obtain access must submit their requests via email**. **Access credentials** will be provided once internal procedures, including password creation, are completed.

3.3 MS consultations on ECICS

COM outlined **two distinct types of consultations** for chemical classifications.

Type A consultations require a more thorough and detailed process. In these consultations, MS are expected to provide comprehensive feedback, either confirming their agreement or offering additional input on the classification of more complex chemicals. This approach ensures that all relevant information is reviewed and validated collectively.

In contrast, **Type B consultations** are simpler. They do not require input from MS. If no response is received within the specified time frame, COM assumes that MS agree with the proposed classification. Type B consultations are specifically designed to minimize efforts, focusing on chemicals that are less complex and less likely to cause disagreement.

COM explained that the division between Type A and Type B consultations is intended to streamline the overall process. It enables **MS to focus their efforts on more complex cases under Type A**, while **simplifying the handling** of less intricate chemicals through **Type B**. This creates a more efficient system that strikes a balance between comprehensive review and streamlined processing.

Consultations held in 2024:

Consultation type	Number of consultations	Total products	Average number of products
A	6	1499	249
B	2	5675	2837
E	2	270	135
Meetings	2	191	96
TOTAL	***12***	***7635***	

* "Consultation type E" = exceptional consultation

ECICS activities and challenges

COM provided a comprehensive **overview of the ECICS activities and challenges** of the last year. Both Type A and Type B consultations were held. Most consultations included around 300 compounds, while the two latest ones included around 3 000 compounds.

COM query on modifying the current ECICS consultation process

COM proposed discontinuing regular consultations and making all products currently labelled as **"in preparation" in the private ECICS publicly available**. This would include around **55 000 products** that **already have a proposed classification**. To ensure transparency and clarity, these products could be **marked with an asterisk** to indicate that their proposed classifications have not yet been reviewed or validated by customs chemical experts.

To encourage participation from MS, a **review period of approximately one year** could be established, allowing MS to provide **feedback on these 55 000 products**.

Additionally, there are about **20 000 products in the restricted ECICS that do not yet have a classification** proposal and are generally categorized under "Chapter 97". These products have not been fully analysed, but this issue could be addressed during future ECICS meetings, where the best course of action for their classification could be discussed.

This approach aims to streamline the process, keep the system up-to-date, and enable regular updates, ideally every 2 to 3 months. It is also worth noting that **not all products have a CAS number, and some may have multiple CAS numbers**, which would require further attention during future evaluations.

COM then asked Member States for feedback on the ECICS consultations and invited them to share any idea they may have to improve them.

MS position on the ECICS consultation process

Until now, consultations usually concerned around **250-350 compounds per month, a manageable volume** that was supported by periodic online meetings. Member States mentioned that they appreciated this method which proved to be **effective**.

However, they mentioned that the **recent shift to reviewing 3 000 compounds per month has been overwhelming, draining resources and complicating processes**, especially in smaller customs laboratories. They further explained that this drastic increase in volume could **potentially reduce the quality of the work**, as the capacity to thoroughly analyse and classify each compound may be compromised.

Recommendations

Key recommendation included **restoring the division between Type A (complex) and Type B (simpler) consultations, reducing the monthly compound review target, and maintaining the ECICS database integrity to preserve trust** among customs officials and economic operators.

More **MS expressed concern**, particularly regarding the challenges of achieving COM's proposed objectives with current resource constraints. They highlighted the risk that the existing approach may not deliver the desired outcomes, emphasizing that **limited capacity** could slow down progress. MS suggested **revisiting the proposed methodology** to ensure that the objectives are both realistic and achievable.

Other proposals by the participants were the following:

- **Provisional classifications**, meaning to publish all 70 000 compounds currently in the restricted database, with a disclaimer indicating their provisional status. These would be updated periodically as more compounds are reviewed.

- **Workload distribution**, with the revision of the review tasks into smaller groups of five MS, each responsible for a manageable portion of the compounds. Follow-up meetings every three months would harmonize findings and finalize the classifications.

Redistributing the workload among MS could ease the pressure on smaller countries with limited resources. While there was agreement that workload redistribution could alleviate pressure, it was also noted that such an approach might undermine the system's overall reliability. MS emphasized that **the strength of the classification process lies in the collective expertise of all MS**, which ensures accuracy and **reduces the risk of overlooked errors**. Reducing the number of contributors could compromise the robustness of the system.

- **Holding post-consultation meetings**, with brief discussions to resolve potential disagreements and efficiently finalize classifications.

Participants also suggested that **legislative changes** could be a long-term solution to the growing demands of the classification process. A **balance between speed and accuracy** was debated, with some MS asking for publishing **preliminary classifications** to meet deadlines, though this could risk inaccuracies and database credibility.

Additionally, Member States recommended **extending deadlines** to better align with operational capabilities. They also emphasized that **additional support** for MS, including more resources, will be crucial to effectively manage the consultation workload.

Moving forward, the focus should be on **balancing the distribution of workload with the need for high-quality, reliable classifications**. COM acknowledged the valuable feedback from MS and plans to present a detailed proposal after reviewing all comments.

In conclusion, the meeting emphasized the need to **balance efficiency, accuracy, and collaboration**. COM committed to reviewing all suggestions, while tackling the resource constraints faced by both MS and COM.

3.4 Working Group on Derivatives on Chapter 29

COM provided a summary of the **progress made on the classification of derivatives in Chapter 29**, a topic that has sparked debate due to varying interpretations of what constitutes a **derivative compound**. Previous working group conclusions, particularly those related to penal definitions, have refined the classification of various compounds, however, defining

derivatives consistently remains a challenge. The need to prioritize this issue moving forward was emphasized.

So far, these cases have been discussed in the sub-working group on derivatives of HS Chapter 29:
- in April 2024: Cannabinols - CN 2932 95 and Hydantoins - CN 2933 21

- in June 2024: Vitamin E - CN 2936 28, Fentanyls - HS 2933, Steroids - HS 2937

Case	Name	Some CN/HS/Chapters concerned
1	Hydantoins	2933 21 00
2	Cannabinols	2932 95 00
3	Vitamin E	2936 28, 2936 90
5	Fentanyls	2933 33 00; 2933 34 00
6	Steroids	2937 29 00
-	Aminoacids carbamates	2922
-	Imines	2925
-	Vitamines A and D	
-	Salts	Some entries in Chapter 29 contain e.g. '… and its salts'. Others don't.
-	Barbiturics	
-	Insuline	
-	Aromatic polyamides	
-	….	….

In the future, the focus should be on: Amino acids carbamates (HS 2922), Imines (HS 2925), Vitamins A and D, Salts, Insulin, Aromatic polyamides, Alkaloid derivatives, and others.

MS highlighted the difficulty in establishing a universal **definition for derivatives** across Chapter 29. They proposed a more granular approach, such as **classifying derivatives by sub-chapters or specific headings**, to create clearer criteria for customs classifications. The possibility of classifying derivatives in a manner similar to analogues, applicable to all products in Chapter 29, was also discussed as a potentially helpful solution. Additionally, the **classification of salts** was identified as an ongoing issue that requires urgent attention.

A key topic of discussion was the **redistribution of responsibilities for organizing meetings**. COM highlighted that organizing these discussions requires significant preparation and suggested that **MS could take on more responsibility in leading specific topics**, thus sharing the organizational burden.

To alleviate this, the suggestion was made to hold around **two meetings per year** to balance workload and progress. The **World Customs Organization (WCO) was mentioned as a potential platform for addressing these classification issues globally**, as other countries may face similar challenges.

COM is eager to resolve **outstanding issues**, particularly concerning substances like vitamin E, steroids, and salts. Ongoing discussions will continue to refine the classification of derivatives, with the goal of achieving a consistent definition across substances. A **finalized proposal is expected within two years**, with these decisions to be made **publicly available**.

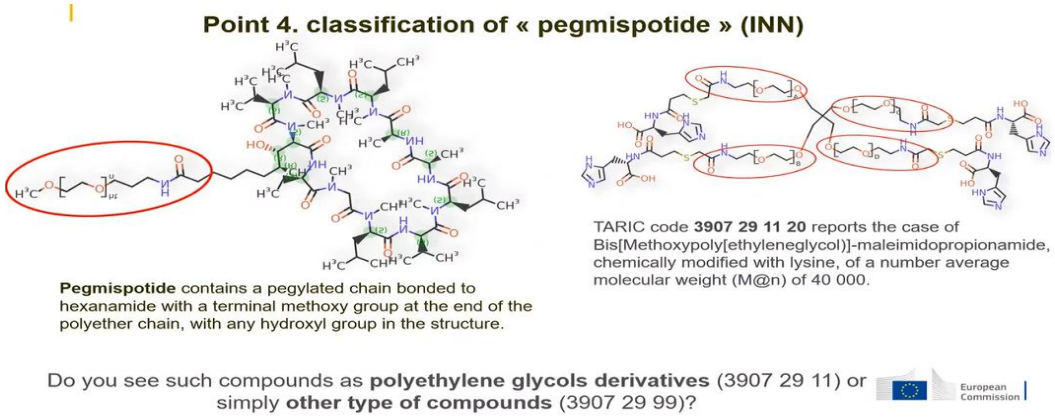
Looking ahead, COM is considering whether to maintain two meetings annually or increase the frequency. The goal is to streamline the process and encourage more active involvement from MS, acknowledging the complexities of classification.

3.5 WCO Scientific Sub-Committee

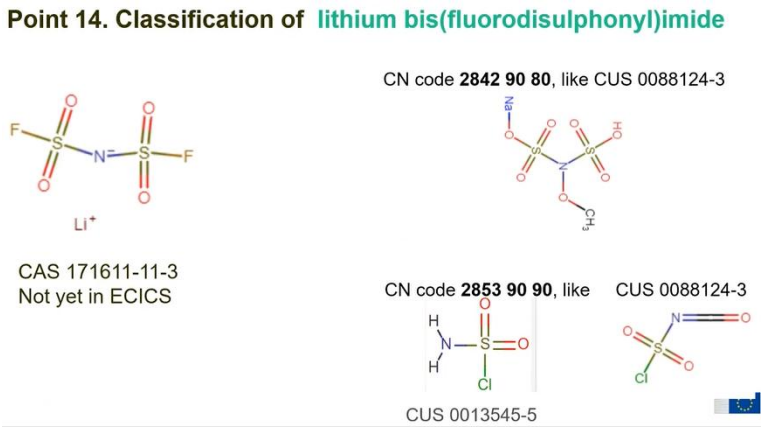
COM explained that, in preparation for the next **40th WCO Scientific Sub Committee (SSC) Meeting (20-24 January 2025)**, it is essential to gather the opinions of MS on several issues. To facilitate this, a copy of the **minutes from the previous SSC meeting**, which highlighted key chemical-related topics, was shared. These minutes outlined several important discussions expected to take place at the upcoming meeting.

COM underlined key issues:

- The classification of **pegmispotide** (INN) – CN 3907 29 11 or 3907 29 99.



- A possible amendment to Part (V) (b) of the **Explanatory Notes** to heading 29.37, aimed at providing clearer guidance on what is allowable for **ring expansion.**
- A proposed amendment to the Explanatory Notes for heading 29.41 to clarify the difference between **antibiotics** and **antibacterials.**
- The potential replacement of the **d, l** designation system with the **R-/S-** stereodescriptors.
- INN products with the stems "**-golix**" and "**-relix**".
- INN products with stems "**-cept**".
- The classification of the product **"lithium bis(fluorosulfonyl)imide"** (CAS number **171611-11-3)**, as requested by Japan, is not yet included in ECICS. However, similar chemicals are classified in ECICS under CN **2842 90 80**, such as CUS **0088124-3**, or under CN **2853 90 90**, such as CUS **0013545-5** and CUS **0088124-3**.



These topics were identified as key issues that require ongoing discussion and collaboration to ensure clarity, consistency, and alignment in chemical classifications.

COM emphasized the importance of providing comprehensive **information in preparation** for the upcoming **WCO meeting**. In particular, it was noted that **clarifying the distribution of work** and confirming who would be **attending** would be essential to ensure that all relevant stakeholders are properly involved and ready for the discussions.

Challenges were noted, particularly tight timelines and delayed document availability due to holiday schedules. Suggestions for improvement included **using past SSC minutes** to

identify potential agenda items early and **inviting MS to submit input** on key issues, such as explanatory notes and classification changes. A structured feedback mechanism was seen as essential to streamline contributions.

In particular, MS were encouraged to review the presented documentation to provide their feedback, **ensuring it is submitted to COM at the earliest convenience**. One MS had already shared its perspective, noting that classifying the problematic chemicals **based on their structure** would be more straightforward than doing so based on their source or properties. MS also expressed **support for the use of R-/S- stereodescriptors** in the classification process. **Early preparation**, even before official WCO documents are released, was considered **crucial**.

A plan for the upcoming year was proposed, with **two meetings planned**, and a third optional one if urgent matters arise. COM emphasized the importance of **early distribution of documents** to ensure adequate time for consultation.

3.6 Pending cases for classification – discussion on specific cases

The discussion on pending cases focused on **unresolved classification** disputes involving chemicals from various sources, i.e., from legislation, economic operators, customs, and international registrations.

COM explained that the process for addressing pending cases involves organizing consultations by CN or HS codes, **grouping chemicals with similar classification characteristics** to streamline the decision-making process. Around 95% of cases reach classification consensus, however, persistent disagreements result in the creation of a *"pending cases"* basket for further review.

Pending cases are **revisited regularly** during meetings with MS. Ongoing discussions include issues like organic salts and mixtures, where classification criteria diverge.

During the previous ECICS meeting held in March 2024, a summary of these cases was presented. COM has compiled a list of products for **which no classification was proposed, or where no consensus was reached during MS consultations**. These unresolved cases are currently stored in the ***"pending cases list"***, which now includes **over 200 products**. These items will remain pending until they are classified and added to the public ECICS database once resolved. The *"pending cases list"* is continuously updated, and collaborative efforts remain focused on resolving disputes and ensuring accurate classifications for complex chemical compounds.

During the present meeting, COM introduced several **key topics for discussion**, including azaphosphorines, Velagliflozin proline hydrate (1:1:1), and organic salts. The first two topics prompted questions regarding the classification of heterocyclic compounds and the related tariff implications of assigning them to the most appropriate headings. The discussion on organic salts focused on the possibility of classifying them as organic derivatives.

Discussion on Azaphosphorines (proposed by one Member State)

The meeting discussed the classification of azaphosphorines, six-membered cyclic compounds consisting of alternating nitrogen (N) and phosphorus (P) atoms. One Member State proposed that these compounds be classified as *"compounds with other nitrogen function"* rather than as *"heterocyclic compounds"*.

According to the HSEN to Sub-Chapter 29-X, *"heterocyclic"* refers to organic compounds containing one or more rings that include, in addition to carbon atoms, other elements such

as oxygen, nitrogen, or sulfur. This definition was at the center of the debate regarding the most appropriate classification for azaphosphorines.

Currently, azaphosphorine-type compounds are classified under CN code 2929 90 00 in the ECICS database. Given the complexity of the classification issue, a detailed discussion was held on these compounds.

For the **first case** (CUS code 0028886-8, CAS RN 940-71-6, name 2,2,4,4,6,6-hexachloro1,3,5-triaza-2,4,6- triphosphorine), MS thought to classify it under CN **2853 90 90**, based on the phosphorus oxidation state (+5), as it did not seem aligned with other subcategories in **Chapter 28.** Later on, the proposed classifications were CN **2812 19 10** or CN **2812 90 90**. However, the final decision was postponed because a consensus could not be reached. It will be reassessed at a later stage. For now, it will be placed in the *"pending cases list"* for further evaluation and discussion.

The **second case** (CUS code 0159729-1, CAS RN 1184-10-7, name 2,2,4,4,6,6-hexaphenoxy1,3,5,2λ5,4λ5,6λ5- triazatriphosphinine) was suggested to be classified under HS code 2920, due to structural modifications. This compound was viewed as an ester of an inorganic acid. MS debated over whether it should be classified under HS 2920 (esters of inorganic acids) or HS 2929 (other nitrogen-containing compounds). General support was expressed for HS 2920: the compound structure closely resembled an ester of an inorganic acid, making it a more precise classification than residual categories.

As counterarguments, concerns were expressed about the absence of a carbon-nitrogen bond which raised doubts about its classification under HS 2929. A suggestion to classify it under HS 2934 (heterocyclic compounds) was rejected, as it lacked carbon in the ring. As an outcome, there was a general **consensus to classify it under HS 2920, but the exact CN code remains to be determined.**

For the **third case** (CUS code 0037855-2, CAS RN 52-46-0, name: 2,2,4,4,6,6-hexaaziridin-1-yl2,2,4,4,6,6-hexahydro1,3,5,2,4,6- triazatriphosphorine) **and the fourth case** (CUS code 0057103-9, CAS RN 3527-55-7, name: 2,2,4,4,6,6-hexakis(2-methylaziridin-1-yl)-1,3,5,2λ5,4λ5,6λ5-triazatriphosphinine), compounds were found to fall under HS code **2933**, as their chemical structures matched the definitions in the Harmonized System.

In conclusion, while there was broad consensus on most classifications, MS discussed on the challenges of interpreting HS codes and explanatory notes. Some classifications, particularly for esters of inorganic acids, require further scrutiny to ensure consistency and avoid discrepancies.

Discussion on Velagliflozin Proline Hydrate (1:1:1) (INNM) (proposed by one Member State)

COM addressed the classification of Velagliflozin proline hydrate (1:1:1), CAS RN 1661838-94-3, a compound composed of the pharmaceutical substances velagliflozin and proline. Currently, **velagliflozin** is classified under CN code **2932 99 00** in ECICS as a *"heterocyclic compound with oxygen hetero-atom(s) only"*, while **proline** is classified under CN code **2933 99 80** as a *"heterocyclic compound with nitrogen hetero-atom(s) only"*.

In line with Note 5 (C) (2) of the Combined Nomenclature, which states that *"salts formed between organic compounds of sub-chapters I to X or heading 2942 are to be classified in*

*the heading appropriate to the **base or to the acid from which they are formed**"*, Velagliflozin proline hydrate (1:1:1) should be classified under CN heading **2933**, as it is a salt formed between velagliflozin and proline.

However, an alternative classification was proposed under CN code **2934 99 90**, which covers *"nucleic acids and their salts, whether or not chemically defined; other heterocyclic compounds"*.

The majority of MS agreed that the compound should be classified under heading 2933, based on the presence of **nitrogen-containing heterocyclic structures**. It was argued that the entire molecular structure should be considered, not just certain aspects.

The discussion also investigated into the challenges of **classifying organic salts in general**, which are **made up of different compounds**. Some MS advocated for classification based on the **overall molecular structure and stability**, while others suggested that **the salt form could influence the classification**. This debate highlights the complexity of classifying organic salts within the tariff system.

An additional point of dispute was **whether salts should be classified as derivatives of their base compounds**. Some argued that salts, formed through the interaction of different organic compounds, should be treated as derivatives, affecting their classification. This question remains unresolved, and further discussions are planned to address it.

At the end of the debate, **no consensus was reached** on the classification. The working group will continue discussions in future meetings to clarify the rules for classifying salts and derivatives in the HS, as this issue remains complex and requires further analysis.

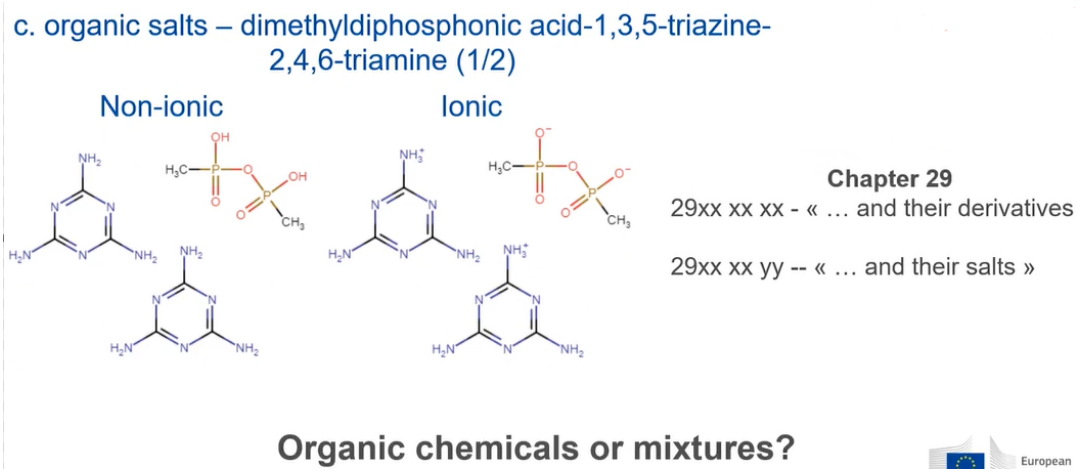
Organic Salts (Pending Cases)

The topic of organic salts was discussed, focusing on chemical products where distinct positive (+) and negative (–) charges can be identified in their two components. Typically, these compounds consist of **two separate organic structures**, one carrying the positive charge and the other carrying the negative charge, which **together form an ionic interaction** that holds them together.

In the Combined Nomenclature, particularly in Chapter 29, headings often include the phrase *"... and their derivatives"*, while sub-headings frequently mention *"... and their salts"* at the end of the line.

Given the debate over whether these organic compounds should be **classified as salts or as mixtures of two organic components**, the discussion addressed two representative examples of organic salts.

Case 6 - CUS number 0158269-0, CAS RN 1423010- 09-6, name: dimethyldiphosphonic acid-1,3,5-triazine-2,4,6- triamine (1/2)



There was significant debate about whether salts should be considered **derivatives or separate entities.**

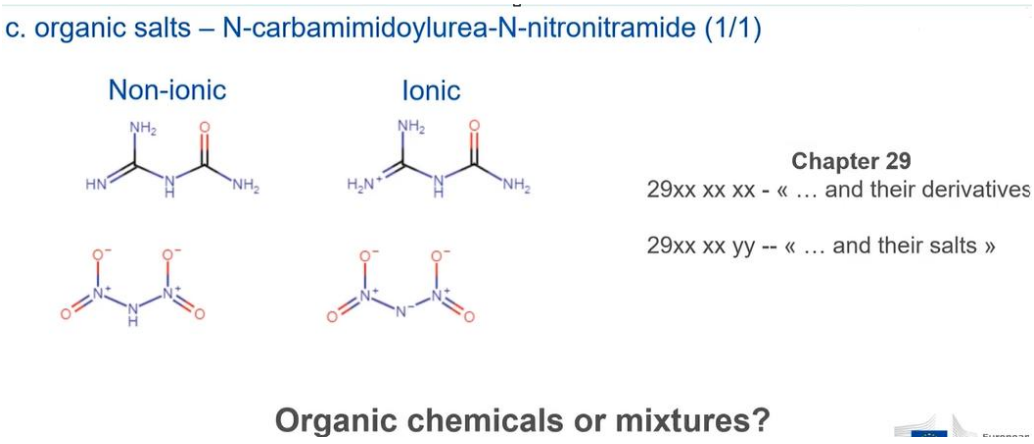
Organic salts, though complex, **often exhibit stable ionic interactions** and should be treated under **Chapter 29**.

Salts can fall under specific subheadings **if derived directly from the parent compound**.

Divergence exists regarding classification as a salt versus a derivative when compositions **vary slightly.**

As an outcome, while salts were broadly classified under **Chapter 29**, further discussion is required to refine the treatment of such compounds, especially where ambiguity exists.

Case 7 - CUS number 0151511-3, CAS RN 217464- 38-5, name: N-carbamimidoylurea-N-nitronitramide (1/1)



The analysis focused on **organic mixtures with a fixed stoichiometric ratio (1:1)**, where the acid and base components interact to form salt-like structures via **ionic bonds**.

Heading 2925 was suggested for its classification, given the interaction between acidic and basic components. Its ionic interaction aligns with the criteria for organic salts.

Regarding the correct heading, MS confirmed that **most compounds reviewed belong to Chapter 29**, with specific subheadings assigned based on molecular structure and interactions. However, there is still need for **clarification as the treatment of salts and their classification as derivatives** remains a key area for future discussion. Therefore, MS

agreed to revisit the issue of salt classification in an upcoming meeting, with the goal of establishing **clearer guidelines**.

By the end of the meeting, consensus was reached on **classifying the compound with ionic interactions as a salt**. MS also agreed on the need for **more frequent meetings** to address pending cases and refine the classification process, particularly through smaller, focused sessions on specific topics like dyes and derivatives.

Proposals for handling "pending cases"

Participants concluded that a structured approach is required to resolve the "pending cases" effectively. Based on the discussions, they proposed the following concise plan:

- **Grouping and tackling pending cases**

- Pending cases could be grouped by topic (e.g., salts, dyes) and addressed in upcoming meetings.
- Resolving at least one group of related cases per meeting is feasible, provided the issues are well-prepared beforehand.

- **Frequency of meetings**

- Smaller, focused working group meetings (e.g., quarterly) could help resolve specific pending cases.
- Larger, general meetings can then address broader, more complex issues requiring additional consensus.

- **Submitting to the WCO**

If consensus cannot be reached within the working group, unresolved cases should be escalated to the WCO for broader international discussion. Other countries may face similar challenges but lack a forum to address them systematically.

In conclusion, **grouping pending cases** and addressing them systematically **in smaller, frequent sessions** will streamline the process while maintaining the opportunity for broader discussions in general meetings. This approach should ensure progress in the upcoming year.

4. Conclusions/recommendations/opinions

The meeting was entirely dedicated to the discussions reported in *Section 3*. The main conclusions, opinions and recommendations can be summarised as follows:

- **COM is developing an e-learning training tool** to assist users in navigating in the **public ECICS**, which will be available **by spring 2025**, with guidance on searching in the database and filling in grey fields.
- **COM plans to create an e-learning module** for users of **restricted ECICS**, focusing on how to introduce **new products**.
- **More chemicals need to be classified** and **added** to ECICS.
- **Improved links to regulations** are requested to facilitate easier access to relevant legal information.
- **MS wishing to access the restricted ECICS database** should submit their requests via email.

- Historically, 250-350 compounds were reviewed monthly, but the shift to reviewing **3 000 compounds per month has overwhelmed resources,** particularly in smaller customs laboratories. COM acknowledged these concerns and committed to taking the necessary steps to address them.
- **Key recommendation** included **restoring the division between Type A (complex) and Type B (simpler) consultations, reducing the monthly compound review target, and maintaining ECICS database integrity to preserve trust** among customs officials and economic operators.
- **Maintaining the credibility and authority of the ECICS classification system**. The system's trustworthiness has been built on contributions from **all MS**, and it is essential to preserve this collaborative process.
- **Pending cases** could be **grouped by topic** (e.g., salts, dyes) and addressed in upcoming meetings. If consensus cannot be reached within the working group, unresolved cases should be escalated to the WCO for broader international discussion.
- COM emphasized the importance of preparing thoroughly for the **upcoming WCO meetings**, highlighting the need to clarify the distribution of work and confirm attendance to ensure all relevant stakeholders are engaged and ready for the discussions. **MS** were encouraged to review the presented documentation and **submit their feedback to COM as soon as possible**.
- **New documents will be drafted** as necessary to address remaining issues for discussion at future meetings.
- **ECICS will be updated** once the final conclusions are approved. These conclusions will also be presented to the CCC for endorsement.

5. Next steps

Next steps were progressively discussed during the meeting and are reported in *Section 3.*

6. Next meeting

A next meeting on the **Update and enrichment of ECICS** will be organised in **2025**.

7. List of participants

European Commission

5 delegates

Customs Laboratories

European Union

20 Member States

Candidate countries

3 Candidate countries

Contractor

1 contractor