



EUROPEAN COMMISSION
DIRECTORATE-GENERAL
TAXATION AND CUSTOMS UNION
Digital delivery of Customs and Taxation Policies
Process and Data, Customer Relationship and Planning

Minutes of the 10th Project Group Meeting

UCC DA/IA Data Annexes Revision for Harmonisation of Customs Data Requirements (CPG 176)

held in Brussels on **26 February 2020**

The **Chair** welcomed the participants to the 10th meeting of the Customs 2020 Project Group (PG) dedicated to the UCC DA/IA Data Annexes Revision for Harmonisation of Customs Data Requirements (hereinafter the “PG UCC DA/IA”).

COM informed that the meeting scheduled on 01/04/2020, might be the last PG UCC DA/IA meeting, noting though the possibility of having one more in May 2020 and urged the delegates to try and finalise the work. Following the finalisation of the PG UCC DA/IA discussions, an internal evaluation with DG TAXUD’s experts on Annex A review will begin, which will conclude with the discussions within the DIH committee. In addition, **COM** reminded the deadline of 15/03/2020 to submit a proposal for Annex A. It was noted that the formalisation of the change management procedure on the Annexes A, B and 12 has started and will also be discussed at the DIH committee. The internal expert group under DG TAXUD for Annex A is under formation and it is expected to be set up within the next weeks. Estimated time for the first legal draft of Annex A proposals will be available around March-April 2021.

NL noted that the planned discussions on the grouped comments with national experts cannot be dealt with in such short period of time, by May 2020. It was also requested to specify the reason changing the date of the upcoming CCC-DIH meeting from 31/03/2020 to 30/03/2020. **COM** informed that the change was reasoning due to the organisational issues in the CCAB.

FI and **SE** inquired for the possibility having a 2-day meeting for the next PG UCC DA/IA in order to progress on the discussions. **COM** agreed and will check the room availability, noting that a joint meeting with the CDS PG will be very useful.

Further, **COM** informed that the next major version of the WCO Data Model (DM) v4.0 is scheduled to be available by the end of 2021. At the WCO data model project team (DMPT) meeting on 27-31/01/2020, it was proposed to include data elements, classes, sub-classes and any objective related to the decisions to the new WCO DM v4.0. The proposal was not rejected, and an ad-hoc session will be organised on the week of 27-30/04/2020. The delegates were encouraged to participate in this session.

The delegates were also informed that due to the UK withdrawal from the EU, EUROSTAT is preparing geonomenclature (GEONOM) codes for the identification of the Northern Ireland and UK, excluding Northern Ireland. Following the protocols agreement, Northern Ireland will continue with the applicability of the UCC. Hence, for the implementation of the declarations and decisions, specific GEONOM codes are required. The attributed GEONOM codes for Northern Ireland will be ‘XI’ and ‘XU’ for UK excluding Northern Ireland. Currently, this proposal is under inter-service consultation. The date of the final publication has not been indicated yet. It was noted that the GEONOM codes will also be implemented in the CS/RD2 system, thus all the systems relying on CS/RD2 will be able to process the information from the virtual borders between the Northern Ireland and UK. These codes will be included also in the CR8 code list with the necessary attributes meaning that all the derive code lists will be updated automatically. **LU** inquired whether the same code list will be included in TARIC. **COM** and **NL** replied positively.

NATURE OF THE MEETING

The meeting is not public and the current summary records are only for COM use. The meeting was attended in person by the representatives from the national administrations.

APPROVAL OF THE AGENDA AND OF THE MINUTES OF PREVIOUS MEETING

The agenda was adopted as proposed.

The minutes of the 9th CPG176 meeting held on 15/01/2019 were published on 29/01/2020 on PICS. The following [remarks](#) have been received in writing from NL:

Paragraph 6 page 2: “NL sent a non-paper on 14/01/2020 regarding the use of the new Article 24(b)” to read as “... *the use of the new Article 2(4)(b).*”

Paragraph 6 page 2: “... this will cause problems in the customs logistic chain” to read as “... *this will cause problems in the Trade logistic chain.*”

Paragraph 2 page 3: “...the surveillance interface and the customs declaration system” to read as “... *the surveillance interface from the customs declaration system.*”

The minutes were approved following the implementation of the NL’s comments.

LIST OF POINTS DISCUSSED

3 ORGANISATIONAL ISSUES

The **Chair** informed about the meeting schedule, adding that a meeting of the PG on UCC CCI IT Ph1 is held at the same day and if the delegates are interested, they are welcome to attend the afternoon session on the “*Common codes for type of controls and for results of the controls*” in the next building in DG Education and Culture.

4 COMMENTS ON THE REVIEW OF ANNEX A

COM informed that a new version of the [UCC-DA-IA Annex A CCO v5p0](#) was uploaded on PICS with an additional *change log* tap which indicates the duplicated inserts from FI and SE.

NL inquired whether its comments were also included in this version of the document. **COM** apologised for missing the comments provided from NL and reassured to include them in the next version of the document.

LV informed that it has posted a question regarding the data element on [additional references](#) (Annex B) in PG’s forum on PICS. It was noted that during the 7th PG UCC DA/IA, it was decided to delete this data element, however, in the new version of Annex B, it still exists. **LT** has also identified an issue with the data element on the supporting documents noting that the UCC DA stipulates that it is not possible to apply for licenses under columns H6 and H7 in case of prohibition and restrictions. **NL** informed that according to the discussions in the last DIH meeting, it is not necessary to have additional reference for the eCommerce. **COM** noted the remarks and will mention this point to the related colleagues managing the revision of Annex B. Due to the finalisation of Annex B, it was proposed to preserve this modification until the change management procedure is in place and to avoid delaying the completion and the publication of Annex B. **NL** supported **COM**’s view, noting the importance of finalising the revision of Annex B as soon as possible in order to start with the development of the systems.

LV asked for the opinion of the other delegates on how they are handling the data element on the additional references. **NL** mentioned that for the eCommerce it uses Annex C and as regards the new structure, it uses only supporting documents. **LT** noted that the use of the supporting documents for the licenses and certificates is not possible according to the legislation. **NL** and **LV** informed that based to the latest version 9.1 of the Annex B data requirements table, the data element on the supporting documents for the licenses and certificates has been removed.

COM presented the feedback received from the MSs (available on PICS) on Annex A. In addition, **COM** noted that at the next DIH meeting on 30/03/2020, it will suggest applying a general rule for the consolidated table inputs, saying that only the latest comments will remain, and the old ones will be removed in order to avoid duplicates. The DIH delegates will have a deadline of one week to provide feedback on this matter.

[FR proposal](#):

Comment #35 (#34 duplication)

SE stated that the data element 4/9 can be used with a minor modification, including the EORI number instead of creating a new one.

NL was not in favour to create a new data element informing that according to its experts, in most of the cases of special arrangements, the holder of the goods is legally the same person as the holder of the license. A declaration for placement under a special arrangement entails obligations that can only be complied with by the holder of the license and this means that the holder of the license must make the declaration (or his representative on his behalf) according to Article 170(1) 2nd paragraph of the UCC. **NL** also informed about the excel file which depicting an overview on the impact of Annex A due to Annex B changes ([Changes in Annex B with impact on Annex A](#)). It was also added that the involved persons exist in the data element 7/5 of Annex A. **COM** agreed that this data element covers the required columns, but it provided only a free text. This data element provides the possibility to indicate name address and function of other persons involved. **NL** mentioned that in the previous version of the EUCDM this data element had a structured field which was preferable formulation since a lot of information have to be indicated. This change occurred due to the alignment of the EUCDM with the current Annex A.

DE noted that the data element 7/5 describes the processing procedure and not where the process took place. For the place of processing data element 4/9 is more suitable to be used.

COM summarised the discussed options:

1. Create a new data element 3/9 with an indication of an EORI number and the customs office reference number (if available);
2. Use the current data element 4/9 with an additional information on the EORI number;
3. Use the current data element 7/5 with the following modification, increase the free text capacity or reintroduce the structure used in the previous EUCDM including the EORI number.

NL noted that in case of the data element 7/5 modification, the description in Chapter 2 of Annex A should change in order to be aligned. **COM** informed that the provided proposals will be reflected under 7.5 *Planned Activities* tab of the UCC-DA-IA_Annex_A_CCO file and asked FR to provide their opinion on the proposed solutions. **COM** was of the opinion that the data element 7/5 might not cover the needs indicated by FR, adding that the combination of the two data elements 4/9 and 7/5 would be more practical with the indicated adjustments. **DE** supported the need to have the free text field as an option allowing the possibility to provide additional information if necessary. **COM** suggested posting these proposals in the PG's forum on PICS in order to receive feedback from the rest of the delegates. It was also noted that CDS experts will also be consulted on the link of the multi locations and activities. In addition, **COM** mentioned that in the current Annex A, the header item levels do not exist, it has only a distinction between the decision and the authorisations whereas, the sequencing in Annex B is distinguished by item level. **NL** added that based on the system specifications, it is also indicated following the commodity and the description of the goods, which are separate elements in Annex B. **COM** noted that the correlation of the sequence number and the sequence position identifier are also corresponding to the goods item number on the WCO website. To the present context, **COM** informed about the dedicated PICS group on WCO DA which contains data model files, noting that the WCO DM is free of charge for all WCO member administrations including the EU. To receive access to the WCO every administration has a dedicated WCO directive which can provide the necessary access credentials.

Comment#40

The proposal is to create a new data element that will consider the amended information over time and to have the possibility to view the different versions of the authorisations. **PT** noted that legally, the only information needed is the supervising customs office. The system needs to be adapted and to provide the possibility to display the performed changes on the supervising customs office. The system should adapt to the legislation and not the other way around.

LU stated that this indication will also be helpful in cases where the types of the goods processed have changed in the authorisation. **PT** said that the data element on the type of goods exists and should be updated if there is a change, but no additional data element is required to be created since it is not legal but system's problem. **LU** proposed following similar approach as for transit, noting the functionality that indicates a special attribute to the specific customs office which previously existed. **NL** stated that this information is defined by the system specifications and not in the legislation. **COM** agreed with **NL**'s explanation, adding that this information is indicated in the customs office list which indicates the operative and inoperative customs offices.

COM noted that based to the discussions, this proposal is a functional request for the CDS, noting that similar issue was raised for the AEO which was solved and now it is possible to view authorisations history in the system.

Group recommendation: This point is considered closed since this suggestion is for the CDS functionality improvement. The same applies for comments #41 up to #45.

Rules of Procedure and/or Additional protocol

There is a need to amend the DIH rules of procedure because some of the topics are not covered by the DIH committee and the related expert groups and it is unclear which group or committee could handle the additional topics indicated in the proposal. **COM** noted the remark, saying that the technical specifications are out of scope for the DIH committee. It was added that the approval for the specifications is provided by the ECCG forum. **COM** will consult the colleagues on CDS, NCTS and AES if they have different procedure and will come back on this matter. Also, **COM** asked **FR** to put this question on **PG**'s UCC DA/IA forum on PICS.

Following **SE**'s and **NL**'s proposal (available on PICS) to align Annex B and A, **COM** inquired for the participants view.

NL noted that **ES** had a lot of problems amending its systems to the Annex B format which also lead to excessive costs. **LU** added that CDS is not the only system that will change, the application where the data is stored as well as the particulars of the authorisations will also be affected. **NL** agreed, stated that if Annex A is not aligned with Annex B, then it will lead to a validation problem between the systems via the CRS. **NL** highlighted the importance to consider if a possibility exists to perform the alignment of the data elements between two annexes. **NL** indicated the data element 4/8 on the location of the goods of Annex A, noting that it has a direct correlation with the data element 5/23 of the current Annex B following the reference used under the notes. Hence, this data element should be aligned or the reference in the notes should be removed. **NL** also underlined the importance having a clear picture for the transitional period and proposed to include the 40 data elements in the EUCDM. **COM** pointed out that the data elements indicated in the TDA are out of scope saying that in the future, the systems amendments will be indicated in a draft EUCDM which will be published on PICS/CIRCABC for the MSs consultation. **COM** was of the opinion to keep legally Annex B and A separate and provided the example of SURV data elements in Article 55(1) – Annex 21-01.

[NL's proposal for the changes in Annex B with impact on Annex A and \(SE proposal point 1\)](#)

NL presented the correlation table of the identified changes in Annex B with impact to Annex A. **COM** asked whether the data elements from the customs declarations from Annex B have been used in Annex A or if these data have been checked in practice within the national administrations. Delegates concurred that the data element on the location of goods has been

used. As regards the address structure, **COM** stated that it has already adopted and implemented in Annex B thus, Annex A will follow the same approach and it will also proceed with separate fields.

As regards the amendment of the post code elements, **COM** stated that it will be raised up to an..17 in Annex A which will cover also the an..9 for the countries that are comply with the WCO DM and will not affect the operation of the BTI system. Further, **COM** inquired whether the GNSS is also necessary to be included in Annex A. The delegates underlined the importance having the data aligned for the validation purposes. **NL** proposed to consult the CDS PG on the GNSS.

Groups recommendation: not to support a complete link of Annex B with A and preferably to keep the two annexes legally separated.

COM inquired the delegates whether there is a possibility having some of the procedural codes in Annex B but not in Annex A. **NL** replied positively, adding that for the simplified declarations and entry in declarant's records (EIDR) the procedure code to be used should be indicated.

Group recommendation is to delete the references to Annex B from the notes and to duplicate the code list from Annex B to A with the necessary notifications, highlighting the importance of having the same meaning for the same codes in both annexes.

NL said that the codes (XR, XS and XU) indicated under the notes of the data element 7/2, can be removed since they are indicated in the code list.

FI also mentioned the format of the data element on the e-mail address, which has been increased significantly in Annex B to an..50 and it could also be aligned in Annex A. **COM** noted the proposal, adding that the fax and the telephone number in Annex A is up to an..50, whereas in Annex B is up to an..35. **NL** stated that an..50 is based to the WCO DM.

SE proposals:

Point 2:

Group recommendation was to wait for the change management procedure to proceed with the amendment to copy the column 8f to Annex A. **COM** informed that the procedure for the change management will start in 2020 for all 3 annexes A, B and 12.

Point 3:

SE stated that this proposal is regarding the amendment of Article 24. It was proposed to add the sub-elements "national identification number" (an...35) and "date of birth" (n8) to the data element 3/5 in Annex A to harmonise the data element 3/7. The agreed deadline to amend Article 24 was in June 2019 but due to technical issues, **COM** withdraw its proposal for amendment. **SE** will share the working document on the amendment of Article 24 on PICS. The purpose to amend Article 24 is to highlight how the person should be checked and not to indicate the roles.

PT informed that the revised text of Article 24 is currently under the inter-service consultation. **COM** suggested uploading this point under PG's UCC DA/IA forum on PICS as it will be easier to follow in case additional information will arise on this matter.

Point 4:

This point was already discussed.

Point 5:

The suggested changes have been implemented.

Point 6:

This point is regarding Title VI on application and authorisation for the provision of a comprehensive guarantee, including a possible reduction or waiver.

NL informed that the structure used is in line with the CDS and only the new elements currently have been introduced. A continuous discussion is taking place on the procedural codes that should be included and the reference amounts. **COM** will share on PICS the document presented in the last ECCG56 on 18/11/2020 regarding the GUM state of play. **COM** also went through the latest information on the development of the GUM system presented at the MASP-C quarterly dashboard of November 2019. **COM** will contact the related project manager on GUM system for further information related to the progress of the project. **NL** also noted that the Annex 32-03 of the UCC IA indicates the current practice and the structure of the system on guarantees.

COM inquired the delegates whether is needed to introduce levels in Annex A because currently, there is only a distinction between application and decision level. One point that could be used is for the split amount which could indicate the amount correspondence to each MS involved. This will help to indicate the link of different cardinalities on various elements and sub-elements. **NL** noted that if the structure of Annex A is in line with Annex B in relation to the WCO EUCDM, it will be clearer for the developers how to implement a system. **COM** welcomed any suggestions on the amendment of Annex A structure, noting that Annex A has no limitation from the WCO DM. Further, **COM** mentioned that during the WCO ad-hoc meeting on WCO DM version 4.0 to be held at the end of April 2020, it will propose to include decisions and applications in the WCO DM.

Following the PG's discussions, it was concluded that the structure should be aligned with the CDS data model and to consult with the CDS colleagues on this matter.

Point 7:

This point is regarding the horizontal data elements based on the grouping introduced by the PG UCC DA/IA during the last meeting.

SE asked if a PG on the guidelines for Annex A and B will be established. **COM** confirmed the creation of the PG on the guidelines for the annexes which will start with Annex B, noting that the call for interest is foreseen to be published at the end of March 2020.

NL agreed with **SE**'s proposed grouping, underlining the difficulty to finalise the discussions due to the limited remaining time of this PG until its completion in May 2020. **COM** proposed organising a Webinar on 16/03/2020 to discuss the points on the grouping as part of a preparatory meeting for the next PG UCC DA/IA meeting. Following the deadline of 15/03/2020 on Annex A proposals, **SE** asked whether is possible to have the consolidated table divided into groups in order to have more structural discussions at the next PG UCC DA/IA meeting in April. **COM** will try to prepare and publish the consolidated table by 19/03/2020 on PICS. **COM** will also provide all the missing APOs from the current consolidated table by 06/03/2020 and upload the updated table on PICS and CIRCABC.

[AT proposal to delete footnote 13:](#)

NL informed about an issue raised by **AT** on the timeframes in relation to the UCC CCI PG. According to the UCC CCI PG, the timeframes for the controls in relation to the EIR should always be applicable. Based to Article 234 (2) of the UCC IA, in case of waver the time limit is not provided but in accordance to the UCC CCI PG the time limits should always be provided. To this respect, Article 235 of the UCC IA needs to be amended. **COM** noted to update the consolidated table based on **AT**'s proposal and **NL**'s [new proposal for the D.E. XIV/1](#). **NL**

encouraged also the possibility to consult the UCC CCI Ph2 FSS PG regarding the proposal on the data element XIV/1.

CONCLUSIONS/RECOMMENDATIONS/OPINIONS

COM summarised the to-do list following the discussions of the PG:

- To provide the remaining APOs in the consolidated table by 06/03/2020;
- To organise a Webinar on 16/03/2020 to discuss the points on the grouping as part of a preparatory meeting for the next PG meeting;
- To check the current state of play of the Article 24 with the unit A3;
- To check the current state of play of the GUM project and to upload the working document presented at ECCG56 on PICS regarding this project;
- To inspect whether a legal implementation is needed for the CDS data model structure;
- To plan a 2-day meeting preferably after the DIH committee meeting of 30/03/2020 and to provide the dates of the meeting by 02/03/2020 at the latest if possible;
- To consider deleting the references and notes in legal texts to Annex B and duplicate the code list in Annex A with the necessary modifications with the condition that the same codes should have the same meaning in Annex A and B;
- Proposal for all post code elements to be changed in format to an..17 and for the e-mail to an..256;
- SE and FR to pose their questions regarding the natural persons and the change of procedure, respectively on PG's UCC DA/IA forum on PICS;
- To consider the proposal from NL for the formulation of the data element 7/5;
- To consider the proposal from FR for the creation of the new data element 3/9;
- To consult the colleagues dedicated to the revision of Annex B on the open question on the additional references posted on PG's UCC DA/IA forum on PICS and to check if the latest version of the Annex B data requirements table is published.

The **Chair** closed the 10th meeting of the PG UCC DA/IA by thanking the participants for their active contribution.

NEXT MEETING

The next meeting of the PG will take place on 31/03 - 01/04/2020.