

PostEurop concerns on the Union Customs Code (UCC)

Brussels, February 2013

PostEurop, representing **52 Universal Postal Service** providers across Europe, agrees on the reform of the European Union (EU) customs legislation which should facilitate postal businesses providing fast and in the same time easy clearance processes for all final consumers in the EU. Customs regulations and their delegated and implementing acts should be as simple as possible to avoid new administrative burden which lead to additional cost for postal operators and their customers as well. Therefore, before any new requirements will be introduced, a cost/benefit analysis should give more clarity about the impact on the postal sector and the effects on final consumers.

PostEurop has examined the proposed UCC, both in terms of technical details and procedural aspects. Our first comment refers to **Art.5 34b** – "'postal operator' means a designated operator established in and authorized by a Member State to provide the international services governed ...".

PostEurop thinks that the definition "'postal operator' means an operator established in and designated by a Member State to provide the international services governed ..." will be more precise and link it to EU Member States responsibilities on designated operators in a better way.

With regards to **Art. 19 Empowerment**, unfortunately a major concern has to be addressed. The article states that "The customs authorities shall not require postal operators, declaring items of correspondence or postal consignments as customs representatives, to produce evidence of their empowerment." "Not require ... to produce evidence" means that postal operators should have an empowerment in their hand, whether or not presented as evidence to the customs authorities. Due to the fact that postal operators have to declare millions of shipments a day and taking into account the high percentage of B2C and C2C business, this requirement means that millions of final consumers have to be contacted

day by day to ensure their empowerment for the postal clearance process. Therefore PostEurop strongly recommends that this phrase will be removed and replaced by clear wording which can be managed in the EU postal operations, eg. with a full exception for postal operators as it is today to meet the requirements of the universal service obligation.

This position paper is supported by the following Public Postal Operators:

Country	Public Postal Operators
Austria	Österreichische Post
Belgium	Bpost
Czech Republic	Ceská pošta, s.p.
Danmark	Post Danmark AS
Finland	Itella
France	La Poste
Germany	Deutsche Post
Hungary	Magyar Posta
Ireland	An Post
Italy	Poste Italiane
Latvia	Latvijas Pasts
Luxembourg	P&T Luxembourg
Malta	MaltaPost p.l.c.
Netherlands	PostNL
Norway	Posten Norge
Portugal	CTT Correios
Slovakia	Slovenská Posta a.s.
Spain	Correos
Sweden	Posten AB
United Kingdom	Royal Mail

For further information and action please contact:

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PostEurop is the association which represents the interest of 52 European public postal operators. Committed to supporting and developing a sustainable and competitive European postal communication market accessible to all customers and ensuring a modern and affordable universal service, PostEurop promotes cooperation and innovation bringing added value to the European postal industry. Its members represent 2.1 million employees across Europe and serve to 800 million customers daily through over 175,000 counters. PostEurop is also an officially recognised Restricted Union of the Universal Postal Union (UPU).