



Malcolm Harbour  
Chairman, Committee on Internal Market and  
Consumer Protection  
Bât. Willy Brandt; 06M099  
60, rue Wiertz  
B-1047 Bruxelles

23 February 2011

Dear Mr Harbour, *Dear Malcolm,*

BUSINESSEUROPE is very closely following the current developments in relation to the Modernised European Customs Code (MCC) and its related implementing provisions (MCCIP). A revised European customs code that significantly facilitates customs procedures will contribute significantly to reducing the administrative and financial burden on European companies.

Considering the current draft text under discussion at technical working group level between the Commission and Member States, there are strong concerns that rather than simplifying, the current proposal will imply more burdens for the business community. Some existing customs simplifications are being removed and some innovative solutions in the new code might not be implemented. This impression is reinforced by the envisaged security measures which could entail costs or delays for business if they are not targeted measures. There has been general dissatisfaction in the business community that the European Commission is moving ahead too fast without sufficiently involving and taking companies' expertise into account. Similar concerns over a lack of cooperation have been expressed by member states' representatives.

Modern and light European customs procedures are a key element in maintaining the European Union also in future as an attractive trading and investment place. We count on the European Parliament to ensure that the EU's modernised customs code responds to its stated objectives of efficiency and effectiveness. BUSINESSEUROPE would be very much interested to intensify our dialogue with you and the members of the European Parliament on this important issue. We are also sending a copy of this letter to the members of your Committee and the Committee on International Trade.

Yours sincerely,

*Best regards*  
*Philippe*

Philippe de Buck

cc:

Prof. Vital Moreira, Chairman, Committee on International Trade, European Parliament  
Members of the Committee on Internal Market and Consumer Protection  
Members of the Committee on International Trade