

Mr Gerassimos THOMAS
Director General DG TAXUD

cc. Mr Matthias PETSCHKE, Director of Unit Customs (TAXUD A)
Mr Diego PAPALDO, Ms Sophie DE COSTER, Mr Kris DEJONGH

Brussels, 8 October 2024

Dear Director General, Mr Thomas,

We are writing to you in response to France's announcement regarding the delay in their Automated Export System (AES) deployment on 3rd October, at the 100th meeting of the Electronic Customs Coordination Group (ECCG). This delay and the potential solutions discussed, present serious implications for the European trade and logistics sector, which we believe warrant urgent attention and action.

CLECAT, the European Association of Freight Forwarders, Logistics Service Providers and Customs Agents, would like to request that the Commission officially extends the transitional period for AES until the last Member State is ready to deploy the system. While we fully understand and share the Commission's frustration concerning yet another delay in the UCC Work Programme, we wish to express our strong opposition to both alternative solutions proposed during the ECCG meeting.

France is one of the most critical exit points for European trade. Reverting to paper-based declarations would lead to severe border congestion, delays and operational bottle-necks that would cripple the flow of goods and trade. Moreover, the proposal of mandatory export followed by transit would impose unacceptable financial and operational burden on European traders, who would not only have to submit two declarations instead of one, but also provide a transit guarantee for each export shipment crossing France.

We firmly believe that, an extension of the the transitional period, allowing the use of the current mixed, but functioning and electronic-based European Export System would be a more practical and less disruptive solution. It would enable traders and logistics service providers to maintain operational efficiency and continuity without incurring the service costs and complications associated with the alternatives. Given the stakes for European trade, logistics, and competitiveness, we urge the Commission to extend the transitional period until all Member States are ready to fully implement AES.

We thank you for your consideration in this matter.

Yours sincerely,



Nicolette van der Jagt
Director General