

Brussels, December 5, 2025

Mr Carsten Grønbech Jensen

Ambassador, Permanent Representative of Denmark to the EU

Permanent Representation of Denmark to the EU

Rue d'Arlon 73 / Aarlenstraat 73

B-1040 Brussels

Belgium

Subject: Inclusion of trade and industry representatives in the Council –

European Commission working group on the European Customs Data Hub

Dear Ambassador,

The undersigned associations call for the inclusion of trade and industry representatives in the working group established by the Council and the European Commission on the European Customs Data Hub. This project is a cornerstone of the EU Customs Reform and will fundamentally transform how customs data is collected, processed, and shared across the Union. Without meaningful engagement with trade experts, the Hub risks repeating the shortcomings and delays seen during the Union Customs Code (UCC) Work Programme, where gaps between legislative ambition and operational realities created significant challenges.

Trade stakeholders bring essential expertise: practical insight into data flows and risk management, technical know-how on IT integration and interoperability, and hands-on experience in applying customs requirements across diverse sectors and Member States. Their involvement is critical to ensuring that the Customs Data Hub fulfils its promise of simplification, security, and efficiency for all stakeholders.

To achieve this, we urge three concrete actions:

- first, formally include trade representatives in the working group discussions without delay;
- second, establish a clear and structured consultation mechanism for industry input throughout the design and implementation phases, and;
- third; leverage existing platforms such as the Trade Contact Group to enable effective dialogue.

These measures will help deliver a robust, efficient, and inclusive Customs Data Hub that benefits businesses, authorities, and citizens alike.

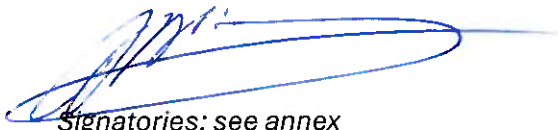
The undersigned associations stand ready to contribute expert resources and to engage constructively with the Council, the Commission and Member States in order to make this flagship project a success.

We thank you for your consideration and remain at your disposal to discuss this request further with you and your services.

Yours sincerely,

on behalf of the undersigned trade and industry associations

Walter Van der Meiren,



Signatories: see annex

Cc

Mr Gerassimos Thomas, Director General, DG TAXUD, European Commission

Ms Charlotte Merlier, Cabinet Šefčovič, DG Trade, European Commission

Mr. Philip Duponteil, Director, DG Taxud , European Commission

Mr. Matthias Petschke, Director, DG Taxud, European Commission








Mr Dirk Gotink, Member of the European Parliament, Rapporteur on the UCC reform

Ms Marie Færch, Customs Counsellor, Permanent Representation of Denmark to the EU

Annex: Signatories

A4E	Airlines for Europe	
ACEA	European Automobile Manufacturers' Association	
AMCHAM EU	American Chamber of Commerce to the EU	
APPLIA	APPLIA Home Appliance Europe	
BusinessEurope	BusinessEurope	
CER	Community of European Railway and Infrastructure Companies	
CLECAT	European Association for Forwarding, Transport, Logistics and Customs Services	

CONFIAD	Confédération Internationale des Agents en Douane	
EBCA	European Branded Clothing Association	
ECMA	European Cigar Manufacturers Association	
Ecommerce Europe	Ecommerce Europe	
ECSA	European Shipowners	
EEA	European Express Association	
EOS	European Organisation for Security	
ESC	European Shippers' Council	

ESIA	European Semiconductor Industry Association	
Eurochambres	Association of European Chambers of Commerce and Industry	
EuroCommerce	EuroCommerce (Retail & Wholesale)	
ESPO	European Seaports Organisation	
Europro	European Pro Committee	
EurTradeNet	EurTradeNet (ETN) – European Alliance of customs-related service providers	
FEPOR	Federation of European Private Port Companies and Terminals	
FESI	Federation of the European Sporting Goods Industry	

IATA	International Air Transport Association	
IVA	International VAT Association	
OCEAN	European Ship Suppliers Organization	
PostEurop	Association of European Public Postal Operators	PostEurop [®]
Tobacco Europe	Tobacco Europe	
WSC	World Shipping Council	