

To the Attention of the Director-Generals of the Customs Administrations in the Member States of the EU:

To the attention of: Ms Heike Fetka-Blüthner, Mr Kristian Vanderwaeren, Mr Georgi Dimov, Mr Mario Demirović, Mr Antonis Pilides, Mr Marek Šimandl and Mr Jiří Trousil, Mr Christian Lützen and Ms Helene Modeweg-Hansen, Mr Raigo Uukkivi, Mr Sami Rakshit, Mr Florian Colas, Mr Dr. Armin Rolfink, Mr Konstantinos Mourtidis, Mr Brigadier General Kristóf Péter Bakai, Mr Gerry Harrahill, Mr Roberto Alesse, Mr Raimonds Zukuls, Mr Darius Žvironas, Mr Alain Bellot, Mr Alan Mamo, Ms Nanette van Schelven, Mr Grzegorz Kozłowski, Ms Helena Maria José Alves Borges, Mr Marcel Simion Mutescu, Mr Vladimir Stasko, Mr Boris Kastelic, Ms Nerea Rodriguez Entremonzaga, Mr Johann Normann

Cc: Mr Matthias PETSCHKE, Mr Philippe DUPONTEIL, Mr Fernando PERREAU DE PINNINCK, Ms Sandra MOLLER, Ms Sophie DE COSTER, Mr Nicolae NEDELCU, Ms Renata PAULIUKAITYTE, Ms Krisztina MARKO

Brussels, 11th August 2025

Subject: Call for Coordinated Request for Derogation from ICS2 R3 Deployment Deadline

Dear Director-General,

Following the discussion during the European Commission's ICS2 technical and operational meeting, held on 6 August 2025, we would like to draw your attention to the possibility for Member States, as raised by the Commission to request a derogation from the end date of the deployment window for ICS2 Release 3, currently scheduled for 1 September 2025.

In light of a range of persisting implementation challenges — including, but not limited to, ongoing IT-related uncertainties, the absence of fully clarified end-to-end process descriptions, the limitation in relation to split consignments, the unavailability of the multiple filing option for the road and rail sector, and extremely limited number of Member States who will be ready with NCTS P6 opt-in by the foreseen deadline— the undersigned organisations believe that strict adherence to the current timeline entails a significant risk of disruption to the flow of goods at the EU's external borders. These challenges may hinder international trade and place both financial and operational strain on public and private supply chain stakeholders.

We therefore respectfully urge your administration to strongly consider submitting a formal request for derogation to the European Commission regardless of the state of readiness in your Member State.

It should be underlined that, in recognition of the practical realities faced by administrations and traders, the end date of the derogations should be considered for an extension until the end of 2026. By that time, all Member States will be in a better position to decide on opting into NCTS P6, and the multiple filing option will become available for road and rail, not just maritime and air, thus creating a level playing field to all supply chain stakeholders. A rapid, coordinated postponement would provide Member States and trade operators with the necessary time to finalise technical and procedural readiness, minimising risks and ensuring a seamless and harmonised implementation.

Furthermore, we would like to highlight that a fragmented approach, where only some Member States apply for a derogation, would likely result in disparities between border control practices and increased pressure on logistics operations, making border management more complex and less predictable or even impossible.

At a time when the European Union is striving to boost its global competitiveness, ensure supply chain resilience, and remain a predictable and attractive trading partner, it is essential to avoid any measure that could undermine confidence in the EU's border procedures.

A lack of coordinated action may ultimately result in goods being blocked or significantly delayed at entry points, with knock-on effects for industry, logistics, and consumers. This would undermine the Union's credibility as a reliable facilitator of international trade and damage the reputation of the Single Market in the eyes of global partners.

In the interest of uniform application, legal certainty, and economic stability, we encourage all customs administrations of the EU Member States to jointly consider the submission of derogation requests. A coordinated effort will be essential to safeguarding the integrity and effectiveness of ICS2 implementation across the Union, while providing much-needed support to traders operating on the European customs environment, whose resources are already under significant strain due to the multitude of parallel UCC Work Programme implementations and the ongoing procedural adjustments.

We remain at your disposal for any further information or dialogue and thank you in advance for your attention and consideration of this matter.

Yours sincerely,

