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CUSTOMS UNION ACTION PLAN

Eurometaux's feedback on the Commission's Roadmap

Eurometaux, the European association of non-ferrous metals producers and recyclers, welcomes the opportunity to provide feedback on the Commission's roadmap **"Taking the Customs Union to the next level"**.

We fully agree with the statement made by the President of the European Commission, that "it is time to take the Customs Union to the next level, equipping it with a stronger framework that will allow us to better protect our citizens and our single market".

Therefore, we support **"an integrated European approach to reinforce customs risk management and effective controls by Member States"** (Political guidelines for the next European Commission 2019-2024 published on 16 July 2019).

Priorities of the Non-ferrous metals sector

We believe that a list of priorities, as mentioned in the Roadmap, under the point **"What does the initiative aim to achieve and how"** would be of great importance.

In particular, we would like to underline the following points, as the core ones for our sector:

- **Enhanced customs cooperation and options for systems interoperability** with security and other competent/law enforcement authorities, in line with WTO Trade Free Agreements philosophy,
- **New initiatives to enhance risk management**, to ensure similar levels of customs controls throughout the Customs Union and to provide support to Member States to address new challenges, including for e-commerce,
- **Enhanced customs cooperation with third countries**, including via the promotion of an alignment with EU customs standards, bilaterally and in multilateral fora.

Our recommendations

As such, we would like to propose the following recommendations for the further development and improvement of cooperation in the Customs Union:

1. Better controls at the borders

Being an ardent supporter of free, but also fair trade, our industry supports **actions aimed at enhancing effective controls at Member States level**. It is also important to say that many EU legislative would gain efficiency if they



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were supported by effective customs controls (based on our industry experience, this is particularly relevant for REACH legislation, Free Trade Agreements, trade defence instruments and many others).

2. Enhanced co-ordination between Members States

We believe that greater synergy between the Member States is very useful for a common European approach, especially in the areas of application and interpretation of these laws. European Commission should ensure, that customs measures have to be consistent in the entire EU 27.

3. More trade facilitation to low risk companies

Customs clearance should be more efficient and easy. Companies with low risk profiles, such as AOE's, should benefit from even more tangible advantages, such as simplified procedures, self-assessments and simplified declarations with less data.

4. Better exchanges and consultation with business

Closer cooperation with business and greater involvement of business in activities would only improve the Customs Union. For this reason, an **enhanced system of continuous and ongoing consultations with all stakeholders** in the Customs Union would be of great added value.

Thus, by saying this, we appreciate the Commission's work on Customs union, and we look forward to further commitments to strengthen the framework of the Customs Union.

Eurometaux will participate in further consultations on this matter.

In the meantime, should you have any questions, do not hesitate to contact the Eurometaux's Secretariat.

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