

Mr Stephen Quest

Director-General
DG TAXUD
Rue Joseph II 79
1000 Brussels

Dr Libor Lochman

Executive Director

Dear Mr Quest,

I would like to draw your attention to the fact that the current covid-19 outbreak and relevant preventive measures result in serious issues with the settlement of the customs transit obligations by rail cargo operators, which, if remain unattended, will very soon cause further disruption to the movement of goods within the EU.

As the result of the relevant preventive measures of the national authorities aimed at slowing down the spread of the disease, many employees of the rail cargo operators responsible for goods administration may not come to work, in particular in the situation when any symptom of illness are shown by any member of their families.

For the moment current customs settlement procedures for goods carried by rail still require that consignment note, as simplified customs transit document, together with other relevant documentation such as in particular health and origin documents, are printed out and brought to the trains (or taken from the trains in case of arrivals). With many of the employees staying at home, this workflow currently constitutes a serious issue and causes considerable delays in customs settlement. This trend unfortunately can already be observed in several EU Member States. It is crucial to tackle this situation quickly in order to avoid further slowdown of movement of goods, timely delivery of which is especially important in the current difficult times.

Apart from the usual amount of goods transported by rail, a considerable amount of goods that is normally transported by road is at the moment being transported by rail due to the delays experienced by the road freight transport at the borders. With this additional flow of goods it is even more important to avoid any unnecessary obstacles for rail cargo transport during the covid-19 outbreak.

Besides, it is also important to bear in mind that in the time of an epidemic and contamination it should be ensured that all employees are able to work in contactless environment and interact with national authorities solely by electronic means, without physical exchange of documentation.

Exceptional measures to allow rail cargo operators to perform customs settlement during covid-19 outbreak

Brussels, 20/03/2020



The pragmatic solution to these issues would be to temporarily allow fully paperless rail cargo transport, which would ensure that data management and declaration could be arranged by the teleworking employees. Against this background, I would like to urge the European Commission to exceptionally allow rail cargo operators to provide all usually paper based customs documents, such as in particular consignment note, transport accompanying documents and customs annexes, in the electronic format, and to send them to all parties involved via electronic means.

The legal provisions currently in force do not provide for a possibility to submit all relevant documentation in the electronic format via electronic channels, however, considering current exceptional circumstances of the covid-19 outbreak, I believe that such exceptional and temporary solution shall be permitted as soon as possible, as it would help ensuring uninterrupted movement of goods in the EU as well as health and safety of the employees involved.

Should you need any further information do not hesitate to contact me.

Yours faithfully,

A handwritten signature in blue ink, appearing to be 'E. Collen', is written in a cursive style.