

Customs Consultative Committee  
1 October 2024, Conference Room, Revenue, Bishop Square, Dublin 2

Attendees – In Person	<p><b>Revenue</b> – Florance Carey (Chairperson), Declan O’Dalaigh, Celine O’Neill, Keith Hannon, Helen Brennan, Peter Redmond (Secretary)</p> <p><b>IBEC</b> – Claudia Dudzinska,</p> <p><b>Technology Ireland</b> – Stephen Tracey</p> <p><b>Dept. of Agriculture, Food, and the Marine</b> – Paul Whelan, Bernadette Doyle, Arthur O’Connor</p> <p><b>Dept. of Foreign Affairs</b> – Jane McCulloch</p> <p><b>Irish International Freight Association</b> – Seamus Kavanagh, Tom Thornton</p> <p><b>Coll-8</b> – Dave Field</p> <p><b>Intertrade Ireland</b> – Una McGoev</p> <p><b>Irish Road Haulage Association</b> – Eugene Drennan</p>
Attendees - Virtual	<p><b>Revenue</b> – Carol-Ann O’Keeffe, Robert Keegan, Ronan Fitzpatrick, Helen Cross</p> <p><b>Irish Road Haulage Association</b> – John Nolan</p> <p><b>Dept of Finance</b> – Elliot McDonnell</p> <p><b>Intertrade Ireland</b> – Marcus Lynn</p> <p><b>Customs IT</b> – Dave Browne</p> <p><b>Technology Ireland</b> – Declan Ivory</p> <p><b>Charter Inst. of Logistics &amp; Transport</b> – James Kearney</p> <p><b>Irish Exporters Association</b> – Simon McKeever</p> <p><b>Primark</b> – Alan Cleary</p> <p><b>FedEx</b> – John Stanley</p>
Introduction	<p>The Chair welcomed everyone to the meeting both in person and online.</p>
Florance Carey	<ul style="list-style-type: none"> <li>• Peter Redmond introduced as new secretary – all queries to him.</li> <li>• The minutes of the last meeting of CCC held on 17 June 2024 were adopted.</li> <li>• As agreed at last meeting, minutes will note names of attendees and organisations they represent.</li> <li>• The amended Rules Governing the Customs Consultative Committee were adopted.</li> <li>• Coll-8 were granted observer status to the CCC.</li> <li>• All information relating to CCC is available on <a href="https://revenue.ie">revenue.ie</a> under Tax and Duty Professionals – CCC.</li> <li>• Exporters raised the issue of NI ferry operators not accepting GMRs when presented with them with the knock-on effect that indirect export declarations leaving IE via NI are not systematically closed off properly on the system. Customs has raised and will raise again with HMRC. Agents asked that there be no repercussions for agents or hauliers as a result of this.</li> </ul>
Customs IT Developments & Updates	<ul style="list-style-type: none"> <li>• AIS -v 2 updated – see <a href="#">e-Customs Notification of 18/2024</a></li> </ul>
Presentation by Helen Brennan (Revenue)	<p>AIS V2 / CCI (Centralised Clearance for Import) will go live 20 January 26 and be fully live by 20 April 26. It will impact on declarants, and we will engage with trade and software houses in relation to the changes.</p> <ul style="list-style-type: none"> <li>• AES – in transition mode. Full mode is due to be implemented on 12 February 25. <a href="#">See e-Customs Notification 22/2024</a>.</li> <li>• <b>ICS2 release R3 Deployment window by transport mode</b></li> </ul>

	<ul style="list-style-type: none"> <li>• <b>3 June 2024 to 04 December 2024:</b> maritime (e.g. containerised) and inland waterways carriers</li> <li>• <b>4 December 2024 to 01 April 2025:</b> maritime and inland waterways house level filers (freight forwarders)</li> <li>• <b>1 April 2025 to 25 September 2025:</b> road and rail carriers</li> <li>• <b>01 Jan 2025 to 01 Sept 2025:</b> RORO (accompanied and unaccompanied) traffic to Ireland</li> </ul> <p><b>ICS2 trade information sessions will be delivered over the coming weeks and months.</b></p> <ul style="list-style-type: none"> <li>• NCTS P5 fully live since July - migration to 20 October 24. Any trade issues, please contact Helen's team.</li> <li>• Proof of Union – raised by IBEC. This is an EU system on which there was instability on 18 September. It caused some disruptions and was fixed. There are low volumes on system in Ireland. Issues with CERTEX on 1 October.</li> <li>• It was confirmed that PBN validation will prevent an MRN being used on multiple PBNs. They will be locked-in at check-in with the ferry operators.</li> </ul> <p>Chair pointed out that while there had been issues with systems last November / December, Revenue has learned from that and has done significant work to make the systems more stable. In addition, system recovery is now faster than before and additional 24/7 IT support had been put in place for the upcoming busy period.</p>
<b>Update on UK Developments from Department of Agriculture, Food, and the Marine (Paul Whelan)</b>	<ul style="list-style-type: none"> <li>• Information is emerging that Border Control Post (BCPs) in UK will be designated for certain commodities only. DAFM is aware of this but doesn't have any specific information. They understand the issues that this causes for trade and is engaging with the UK in relation to the issue. They will keep trade informed as soon as definite information emerges.</li> <li>• Although changes were envisaged in October, it is anticipated that there will be no further updates until Spring 2025. Again, as soon as this is confirmed they will let trade know.</li> <li>• They noted that BCP charges varying per port. Some companies have received no invoices.</li> <li>• IRHA mentioned that only one BCP i.e., Sevington, appeared to list charges.</li> <li>• DAFM will consider issuing a note to trade regarding BCP charges where information is available. However, BCP selection is a commercial decision for businesses, and DAFM cannot recommend one over another.</li> </ul>
<b>UK Developments Celine O'Neill</b>	<ul style="list-style-type: none"> <li>• BTOM – SPS changes for October off the table.</li> <li>• Safety &amp; Security changes due to be implemented 30 October. Very close to implementation date and while it may be deferred, we have no confirmation of this so encourage trade to prepare for this date.</li> <li>• Windsor Framework – new parcel post arrangement between GB and NI is delayed by approximately 6 months. Consequently, all customs simplifications envisaged under the WF will also be delayed including the new trusted trader scheme.</li> <li>• IRHA raised as to whether trusted trader applied UK to NI – few applicants. They also questioned whether the requirement to keep records for a 6-year period was impacting on applications for the new scheme. Revenue is unaware of such concerns and have been informed that uptake is positive.</li> </ul>

<b>Customs Reform Package</b> <b>Celine O'Neill</b>	<p>First technical reading of the Customs Reform Proposal completed in July.</p> <p>The Hungarian Presidency have identified the following as priorities:</p> <ol style="list-style-type: none"> <li>1. EU Customs Authority</li> <li>2. Data Hub.</li> </ol> <p>Generally, support for authority and data hub although further detail is required. Regarding the removal of the €150 de minimis for Customs Duty, we are awaiting a formal position on this from D/ETE. Overwhelming support from other Member States. AEO – Trust &amp; check – concerns that the bar is too high for SMEs. AEO more suitable for them. Trust and Check suitable for larger operators.</p> <p>Regarding timing, we are currently at least 12 months behind original timeline. Suggestions are welcome about proposals or concerns.</p>
<b>Returned Goods Relief</b> <b>Declan O'Dalaigh</b>	<p>At the previous meeting Declan outlined the proofs required to meet the requirement for Returned Goods Relief (RGR). Declarant must have proofs before applying for the relief. Website is continuously updated to reflect latest advice.</p> <p>EVs from China. Since 5 July counter veiling measures apply and duties have to be paid. There have been no importation of Chinese origin EVs since 5 July 2024</p>
<b>Customs Operational Forum (Robert Keegan - IPFMD)</b>	<ul style="list-style-type: none"> <li>Operational forum took place on 25 September, issues discussed included trade from RoI via NI to UK, HMRC and GMR requirements. There will be an interagency meeting this week with DAFM and HSE.</li> </ul> <p>The forum is working well.</p> <p>IRHA stated that GMR is very inflexible with a need to have a UK Government account. Revenue agreed to raise as an issue with HMRC.</p>
<b>Concerns / issues of members</b>	<ul style="list-style-type: none"> <li>IIFA raised issue on login to INIS system with DAFM. The system requires users to use have a mobile phone number. This is an issue as often they don't have company mobiles. DAFM stated that this was due to a concern about multiple logins but agreed to consider.</li> <li>Deforestation Regulation – an issue was raised over what information is required. Revenue has been in touch with DAFM Forestry about his previously as there is a requirement as profile based on commodity codes. Members said that there has been little engagement with trade which is worrying given the imminent introduction of this measure. Customs will raise this issue with DAFM Forestry Service and will keep CCC appraised.</li> </ul>
<b>AOB</b>	<p>IBEC requested more advance notice of CCC meetings</p>
<b>Close and Next Meeting</b>	<p>The meeting concluded.</p> <p>It is proposed that the next meeting will take place, ideally with all attending in person, in early December 2024</p>