

29 April 2019

**EEA written submission to the stakeholder consultation on EU-US regulatory cooperation activities**

The European Express Association (EEA) welcomes the possibility to respond to the European Commission's consultation on the upcoming EU-US trade negotiations.

We believe that, in addition to removing tariffs on industrial goods and increased cooperation on conformity assessments, the EU and US should also discuss Customs and Trade Facilitation provisions. While agreements to eliminate duties on industrial goods and on conformity assessment will help to reduce barriers and improve trade flows, including innovative trade facilitation commitments within the framework of the negotiations would greatly enhance its benefits and could unlock the export potential of both regions' small and medium-sized enterprises (SMEs), while fully respecting EU levels of protection.

Initiatives for regulatory cooperation in the area of customs and trade facilitation should include:

- Setting the customs duty *de minimis* at a commercially-meaningful level;
- Separating physical release of goods from duty and tax collection in all EU member countries;
- Improving on common data elements for both imports and exports;
- Establishing a process to encourage e-commerce vendors and market places to register in the EU's Import One Stop Shop (IOSS) system by simplifying the registration requirements and guaranteeing minimal border processes for IOSS shipments;
- Enforcing and applying the TFA provisions on expedited shipments;
- Facilitating the submission and processing of electronic documentation via a Single Window portal; and
- Ensuring an informal entry clearance for low value shipments based on simplified procedures and reduced data requirements.

Adopting some or all of these measures would complement and significantly enhance the potential of an EU-US trade agreement.

Two specific areas where conformity would be particularly welcomed are in the trusted trader programme and the immediate release of shipments upon arrival. Both the EU and the US have mutually recognised and well-established trusted trader programmes. Thus, there should be a single application and certification process for both, a reduction in inspections, and an expansion of the programmes to cover all relevant government agencies. The parties should also commit to harmonising processes for customs clearance with a goal of immediate clearance of goods on arrival, which would speed-up the flow of commerce. These provisions should not only be open to trusted traders, but to all shipments that are submitted with the required documentation and data.