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**COMMISSION STAFF WORKING DOCUMENT**

*Accompanying the*

**REPORT FROM THE COMMISSION TO THE EUROPEAN PARLIAMENT AND  
THE COUNCIL**

**pursuant to Article 278a of the Union Customs Code, on progress in developing the  
electronic systems provided for under the Code**

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## 1. INTRODUCTION

The Union Customs Code (UCC) requires the European Commission and the Member States to upgrade some existing electronic systems and introduce a number of new systems for the completion of a modern and digital environment of customs formalities. In total, the UCC requires the upgrading or creation of fourteen trans-European systems and three national systems.

The UCC entered into force on 1 May 2016. The deadline for completion of the systems is set for the end of 2020, 2022 or 2025, depending on the system.

In view of the reporting requirement established by Article 278(a) of the Regulation (EU) 2019/632 amending Regulation (EU) 2013/952, the Commission<sup>1</sup> is committed to provide an annual report to the European Parliament and the Council on the progress in developing the electronic systems of the UCC. The report assesses the progress of the Commission and the Member States in developing each of the electronic systems, taking particular note of the following milestones:

- (a) The date of publication of the technical specifications for the external communication<sup>2</sup> of the electronic systems;
- (b) The period of conformance testing with economic operators (EOs);
- (c) The expected and actual dates of deployment of the electronic systems.

The legal deadlines for finalising the technical specifications and for deploying the electronic systems are laid down in the UCC Work Programme (UCC WP)<sup>3</sup>. The detailed planning per project, containing additional milestones such as for the business case, business process modelling, vision document, conformance testing (CT) are defined in the Multi-Annual Strategic Plan for Customs (MASP-C).

The first, second and third UCC Annual Progress Reports<sup>4</sup> were published on 13/12/2019, 14/12/2020 and 14/12/2021 respectively. The details of the completed projects are limited in this report, however additional information can be found in the previous year's reports.

In preparation for this year's **UCC Annual Progress Report 2022**, the Commission continued with the approach taken the previous years and made use of the bi-annual national planning information provided by the Member States' customs authorities and the projects' state of play provided by the project managers in DG TAXUD.

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This annual report covers a reflection of the **progress status achieved on 30 June 2022** including a view on the **expected progress by 31 December 2022** in order to have a full picture of the progress made in 2022.

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The progress information was provided against the baseline milestones indicated in the UCC WP and MASP-C 2019 (unless otherwise specified). In addition, the Commission oversaw the collection of the additional progress reporting information by means of an EU survey launched in March 2022<sup>5</sup>, the EU survey on Implementation of National Projects launched in December 2021 and the bilateral high-level meetings between DG TAXUD and the Member States Customs IT Directorates on the state of play of

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<sup>1</sup> In the context of this report, 'The Commission' refers to the European Commission.

<sup>2</sup> External communication with the economic operators.

<sup>3</sup> Commission Implementing Decision (EU) 2019/2151 of 13 December 2019 establishing the Work Programme relating to the development and deployment of the electronic systems provided for in the Union Customs Code, OJ L 325, 16.12.2019, p. 168-182, <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32019D2151>.

<sup>4</sup> Report from the Commission to the European Parliament and the Council:

2019: <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A52019DC0629>

2020: <https://eur-lex.europa.eu/legal-content/en/ALL/?uri=CELEX:52020DC0806>

2021: <https://eur-lex.europa.eu/legal-content/GA/ALL/?uri=CELEX:52021DC0791>

Commission Staff Working Document:

2019: <https://eur-lex.europa.eu/legal-content/EN/TXT/?qid=1589134753023&uri=CELEX:52019SC0434>

2020: <https://eur-lex.europa.eu/legal-content/NL/ALL/?uri=CELEX:52020SC0339>

2021: <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=SWD:2021:382:FIN>

<sup>5</sup> The information was collected between March 2022 and June 2022.

the UCC IT Implementation. The information gathered from the survey to which both the Member States and key stakeholders/project managers in the Commission responded, consists of progress information, qualitative comments and quantitative measurements of the assessment of complexity and risk in relation to the projects listed in the UCC WP. Finally, specific information was gathered from the more detailed project reporting and monitoring programmes in place since 2020 for the core decentralised trans-European systems in the area of transit and export. The 2021 Survey on the Implementation of National Projects gave a broad perspective on the advancements made by the Member States related to Notification of Arrival, Presentation Notification, Temporary Storage, Special Procedures Component 2 and National Import Systems Upgrade. The survey follows an identical structure with the March 2022 Survey, giving the Commission a clear view on the status of each system.

At the same time, DG TAXUD conducted bilateral high-level meetings with Member States Customs IT Directorates, focusing on having a conversation with each Member State in order to gain the full picture of their status and to see what can be done to support them in their work, especially in the light of the upcoming deadlines for several projects. In this light, UCC Notification of Arrival (AN), UCC Presentation Notification (PN), UCC Temporary Storage (TS), UCC National Import Systems Upgrade and UCC Special Procedures (SP): Component 2 - National SP IMP are foreseen to be operational by the end of 2022.

In view of all this, it can be seen that constant communication has been maintained with the Member States in order to regularly monitor the progress of the UCC projects and to provide the necessary support in order to meet the deadlines.

As background information, it is important to remind that the seventeen electronic systems listed in the UCC Work Programme were divided into three categories:

- i) **eleven central trans-European systems** to be developed or upgraded by the Commission (often also requiring developments or upgrades by the Member States of their corresponding national systems);
- ii) **three decentralised trans-European systems** that have to be developed or upgraded by the Commission, but have a major national component to be implemented by the Member States; and
- iii) **three national systems** that have to be developed or upgraded exclusively by the Member States.

The progress information has been collected, analysed and reported in this accompanying Commission Staff Working Document, which presents the detailed overview of the progress of the various individual projects as follows:

- For the trans-European systems, the analysis and reporting refers to the Commission's activities only when central, while for the systems that involve national input, and even in some cases national components, the analysis refers to both the Commission's and Member States' activities. For the national systems, only Member States' activities are reported;
- For projects that have already been initiated or entirely completed, an overview of the project progress, a summary of the survey responses;
- For projects that have not yet been initiated, an overview of the planned project progress together with a summary of the responses from the survey is provided.

By means of the survey, the Member States were also requested to give an indication of:

- The degree of complexity from their perspective of each project on a scale from 1 to 6, where: 1 and 2 refer to low complexity, 3 and 4 - medium complexity and 5 and 6 - high complexity.
- The risk of not deploying the IT systems by the dates set in the baselines of the UCC WP and MASP-C 2019 according to three levels: low, medium and high.

The consolidation of the survey results, including the abovementioned indicators of complexity and risk, as well as information regarding risks for delays and mitigating measures and any changes in planning in comparison with the planning provided in 2021, are the main outcomes of the progress reporting exercise for 2022 and are included in this **Commission Staff Working Document**. Reporting

information that summarises the current project status, key risks and mitigating actions is found in the **Report from the Commission to the European Parliament and the Council** pursuant to Article 278a of the Union Customs Code, on progress in developing the electronic systems provided for under the Code.

The report is structured as follows:

- Section 1: Introduction;
- Section 2: Projects completed before 2022;
- Section 3: Projects to be completed by the end of 2022;
- Section 4: Projects ongoing during 2022.

## **2. PROJECTS COMPLETED BEFORE 2022**

### **2.1 UCC REGISTERED EXPORTER SYSTEM (REX)**

The UCC Registered Exporter System (REX) is a trans-European system that contains information both on Registered Exporters established in GSP countries<sup>6</sup> and on EU economic operators in partner countries Switzerland, Norway and Turkey exporting to GSP countries and certain other countries. The main purpose of the system is to replace the paper-based certification process by an IT-supported self-certification process. The system includes a central database that contains the registered exporters and provides the Member States with the opportunity to enhance their national systems with an automated verification of REX members.

There were three releases planned. REX1 is the only release covered in the scope of the UCC Work Programme. No risks were identified during the implementation of REX1<sup>7</sup> and the project was successfully completed on 1 January 2017.

Some statistical information on the use of the REX system since operations – situation as of May 2022:

- The REX Trader Portal, as part of the EU Customs Trader Portal (EUCTP) was launched on 25 January 2021;
- 66304 active REX registrations for Beneficiary countries of the EU, Overseas Countries and Territories as well as CH GSPs, NO GSPs, TR GSPs (REX BC) module;
- 85611 active REX registrations for Member States (REX MS) module (including 485 registrations from Partner Countries CH, NO and TR as well as Andorra and San Marino) ;
- 4972 applications submitted by the EU Traders in the REX Specific Trader Portal;
- 729 T-REX Local Users are configured in T-REX module and able to use REX BC;
- 403 T-REX Local Administrators are configured in T-REX module and can manage Local Users.

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<sup>6</sup> Countries benefiting from the EU Generalised Scheme of Preferences (GSP) that provides preferential access to the EU market;

<sup>7</sup> For the scope of EU GSP, in parallel with the GSP scheme for of Switzerland, and Norway as partner countries.

## 2.1.1 Overview of Project Progress

Table 1 compares the actual dates to those set in the UCC Work Programme (WP). Despite there being a slight delay in the finalisation of the Technical Specifications, REX was deployed on time.

Technical Specifications			Conformance Testing		Deployment		
Target date from WP	Actual End Date	% of Completion	Actual End Date	% of Completion	Target date from WP	Actual Date	% of Completion
31/03/2015	30/06/2015	100%	31/12/2016	100%	01/01/2017	01/01/2017	100%

Table 1: Comparison of Planned and Actual Dates – REX1

## 2.2 UCC CUSTOMS DECISIONS

The UCC Customs Decisions System (CDS) is designed to achieve harmonisation of the processes relating to the application for a customs decision, the decision taking and the decision management. This harmonisation is put into practice via the standardisation and electronic management of the application and decision/authorisation data across the Union. The system covers all applications and decisions that may have an impact/are valid in more than one Member State. Member States also have the right to use the Customs Decisions System to manage their national customs decisions, if they wish to do so.

The project was fully deployed on 02/10/2017.

Some statistical information on the use of the CDS:

- Since the start of deployment on 02/10/2017, the number of applications increased from 1,300 in the last three months of 2017 to 14,655 per year in 2018. With an average of 26 applications in 2019, the number of requests dropped significantly in the 2<sup>nd</sup> quarter of 2020, most likely due to the pandemic situation. The situation stabilised after the summer break to an increase of 28 applications per day.
- On 29 June 2020, a second major release of the CDS system was deployed, to fully align the system with the current legislation.
- Until the first semester of 2022, almost 47,300 applications were submitted and 27,900 decisions were taken. Approximatively 43,700 decisions were entered as pre-existing authorisations.

## 2.1.2 Overview of Project Progress

Table 2 highlights that there were no divergences in the planning compared to the dates set in the Work Programme.

Technical Specifications			Conformance Testing		Deployment		
Target date from WP	Actual End Date	% of Completion	Actual End Date	% of Completion	Target date from WP	Actual Date	% of Completion
31/12/2015	31/12/2015	100%	30/09/2017	100%	02/10/2017	02/10/2017	100%

Table 2: Comparison of Planned and Actual Dates – UCC Customs Decisions



## 2.3 UCC DIRECT TRADER ACCESS TO THE EUROPEAN INFORMATION SYSTEMS (UUM&DS)

The Direct Trader Access to the European Information Systems system comprises Uniform User Management and Digital Signature (UUM&DS) components. The system aims to provide a service for user-to-system interfaces targeted to the electronic customs systems provided for in the UCC. In essence, the UUM&DS system facilitates a direct and EU harmonised trader access to the customs systems as stipulated in the UCC.

The first deployment of the project was completed and implemented together with the UCC Customs Decisions system on 02/10/2017 as agreed in the context of the UCC Work Programme.

The system has also been incorporated into other electronic projects such as UCC Binding Tariff Information (BTI), the UCC Authorised Economic Operators (AEO) and the Information Sheets (INF) system for special procedures. The project further evolved to include system-to-system interfaces in view of the ICS2 deployment. It will also be used for future projects such as the one related to the Proof of Union Status (PoUS) system.

All Member States have completed the connectivity configuration.

### 2.1.3 Overview of Project Progress

Table 3 highlights that there are no divergences in the planning compared to the dates set in the Work Programme.

Technical Specifications			Conformance Testing		Deployment		
Target date from WP	Actual End Date	% of Completion	Actual End Date	% of Completion	Target date from WP	Actual Date	% of Completion
31/12/2015	30/09/2015	100%	30/09/2017	100%	02/10/2017	02/10/2017	100%

Table 3: Comparison of Planned and Actual Dates – UUM&DS

## 2.4 UCC ECONOMIC OPERATOR REGISTRATION AND IDENTIFICATION SYSTEM UPGRADE (EORI2)

This system upgrade provided minor changes to the existing trans-European Economic Operator Registration and Identification system. These changes enabled the registration and identification of economic operators of the Union, as well as third-country operators and persons apart from economic operators. EORI2 has been in operation since 05/03/2018.

Some statistical information on the use of the EORI2 system – situation until 01/06/2022:

- The total number of economic operators registered with a valid EORI is 8,024,368.
- 295,036 EORI numbers have been created during the period of 01/01/2022 to 01/06/2022.

### 2.1.4 Overview of Project Progress

Table 4 compares the actual dates to those set in the UCC Work Programme. Despite there being a slight delay in the finalisation of the Technical Specifications, EORI2 was deployed on time.

Technical Specifications			Conformance Testing		Deployment		
Target date from WP	Actual End Date	% of Completion	Actual End Date	% of Completion	Target date from WP	Actual Date	% of Completion
30/06/2016	31/07/2016	100%	28/02/2018	100%	05/03/2018	05/03/2018	100%

Table 4: Comparison of Planned and Actual Dates – EORI2

## 2.5 UCC SURVEILLANCE 3 (SURV3)

The SURV3 system introduces an upgrade to the standard exchange of information in the earlier Surveillance 2 (SURV2) system to align the system with UCC requirements. This database records and centralises all EU trade data (imports and exports) that national customs authorities provide on a daily basis. The upgrade implements electronic data-processing techniques and establishes adequate functionalities needed for processing and analysing the full surveillance dataset obtained from Member States. The new system will improve the customs risk analysis, the fight against fraud, market analysis, post-clearance controls and statistical analysis.

The system was successfully deployed on 01/10/2018, with all the data being gathered in different formats via Surveillance Recap, having all the national systems fully aligned to the UCC, therefore giving the system the ability to work at its full potential.

An emphasis should be made on the need to extend the use of the system, given that for those Member States who are going to be delayed or partially delayed for the National Import Systems, it will have a direct consequence on the collection of the data via SURV RECAP and on the functioning of the reports of the Surveillance 3 system. Therefore, the system will have to be prolonged in use until all MSs are on board.

### 2.1.5 Overview of Project Progress

Table 5 highlights that there were no divergences in the planning compared to the dates set in the Work Programme.

Technical Specifications			Conformance Testing		Deployment		
Target date from WP	Actual End Date	% of Completion	Actual End Date	% of Completion	Target date from WP	Actual Date	% of Completion
30/09/2016	30/09/2016	100%	30/09/2018	100%	01/10/2018	01/10/2018	100%

Table 5: Comparison of Planned and Actual Dates – SURV3

## 2.6 UCC BINDING TARIFF INFORMATION (BTI)

The project for a UCC Binding Tariff Information system aims to upgrade the existing trans-European (EBTI-3) database containing all binding tariff information that has been issued by customs authorities of Member States. The customs authorities concerned must then record their decisions in the BTI database. Economic operators apply for binding tariff decisions in order to have legal certainty that they are applying the correct classification to goods they are importing to or exporting from the EU.

Concerning the status of the project, the first phase was completed by October 2017. The second phase entered into operation on 01/10/2019. The construction of the access for this system to the EU Customs Trader Portal was also completed on 01/10/2019.

Some statistical information on the use of the EBTI system since the go-live of the Trader Portal on 01/10/2019:

- The Trader Portal (central EU or national) is used by all traders in all Member States;
- All BTI applications and decisions are sent electronically;
- Eight BTI core processes consisting of more than 20 sub-processes have been digitalised (related to the BTI application, the issuing and invalidation of the BTI decision and the Right To Be Heard procedure);
- More than 73,000 BTI applications (11,000 via the EU TP and 62,000 via the national TP) have been submitted by the traders and more than 73,000 BTI decisions were issued to the traders;
- Other BTI related communications such as notifications and BTI decision invalidations between traders and Decision Taking Customs Authorities (DTCA) were sent electronically via the EU TP.

### 2.1.6 Overview of Project Progress

Table 6 compares the actual dates to those set in the Work Programme. Despite there being a slight delay of the Technical Specifications for Step 2, all phases were deployed on time.

Technical Specifications			Conformance Testing		Deployment		
Target date from WP	Actual End Date	% of Completion	Actual End Date	% of Completion	Target date from WP	Actual Date	% of Completion
30/06/2016	10/06/2016	100%	21/02/2017	100%	01/03/2017	01/03/2017	100%
30/06/2016	02/09/2016	100%	25/02/2017	100%	02/10/2017	02/10/2017	100%
30/06/2018	30/06/2018	100%	01/07/2019	100%	01/10/2019	01/10/2019	100%

Table 6: Comparison of Planned and Actual Dates – BTI

## 2.7 UCC AUTHORISED ECONOMIC OPERATORS (AEO) UPGRADE

Following the legal changes adopted in the UCC, the Authorised Economic Operators (AEO) upgrade aims to improve the system of applications and authorisations for AEO status. The project consists of two phases. Phase 1 implemented major enhancements to the existing AEO system, in light of the harmonisation of the decision-taking procedure for customs. Phase 2 implemented the electronic form with a view to provide a harmonised interface for economic operators to submit their AEO applications and to receive their AEO decisions electronically. The upgraded system was deployed in two releases: Part 1 for the submission of the AEO applications and the decision-taking process (Phase 2 Part 1) and Part 2 for the other processes (Phase 2 Part 2).

Some statistical information on the use of the AEO system – situation on 31/07/2022:

Since the EU eAEO Trader Portal has been deployed in October 2019:

- 1450 AEO applications have been submitted via the EU eAEO Trader Portal;
- ~3500 Economic operators have accessed (125 the first quarter of 2021) the EU eAEO Trader Portal;
- 5500 documents have been exchanged via the EU eAEO trader Portal;
- 25 Member States are leveraging the EU eAEO Trader Portal and the remaining Member States are utilising their own National Trader Portal.

On 31/07/2022, 18,150 valid AEO authorisations are granted to Economic Operators in the EOS central system.

### 2.1.7 Overview of Project Progress

Table 7 highlights that there are no divergences in the planning compared to the dates set in the Work Programme.

Technical Specifications			Conformance Testing		Deployment		
Target date from WP	Actual End Date	% of Completion	Actual End Date	% of Completion	Target date from WP	Actual Date	% of Completion
31/03/2016	31/03/2016	100%	28/02/2018	100%	05/03/2018	05/03/2018	100%
31/12/2018	31/12/2018	100%	29/07/2019	100%	01/10/2019	01/10/2019	100%
31/12/2018	31/12/2018	100%	06/11/2019	100%	16/12/2019	16/12/2019	100%

Table 7: Comparison of Planned and Actual Dates – AEO Upgrade

## 2.8 UCC INFORMATION SHEETS (INF) FOR SPECIAL PROCEDURES

The aim of the UCC Information Sheets (INF) for Special Procedures project is to develop a new trans-European system to support and streamline the data management processes and the electronic handling of data in the domain of Special Procedures. This new system will harmonise the approach for the efficient management of inward and outward processing procedures and improve the monitoring and control amongst customs offices.

The INF central system was successfully deployed on 01/06/2020.

The INF Specific Trader Portal (INF STP) component was also successfully integrated into the EU customs trader portal (EU CTP) and deployed on 01/06/2020. The EU CTP is the single portal at Union level to provide traders unique access to a number of centralised trans-European systems (EBTI, AEO, INF).

Close contacts between the Commission and the Member States are kept to provide the necessary support, assistance and supervision. A project group with Member States and trade associations is holding regular meetings to address any remaining business issues.

Some statistical information on the use of the INF system:

- As from October 2020, all Member States are using the INF system.
- From the start of operations on 1/06/2020 until March 2022, around 39,700 requests were created by economic operators, and approximately 36,000 INFs were treated and processed.
- The average number of requests and authorisations increased over the first half of 2021 and then stabilised.

### 2.1.8 Overview of Project Progress

Table 8 highlights that there were no divergences in the planning compared to the dates set in the Work Programme.

Technical Specifications			Conformance Testing		Deployment		
Target date from WP	Actual End Date	% of Completion	Actual End Date	% of Completion	Target date from WP	Actual Date	% of Completion
30/06/2018	30/06/2018	100%	29/05/2020	100%	01/06/2020	01/06/2020	100%

Table 8: Comparison of Planned and Actual Dates – INF

## 2.9 UCC IMPORT CONTROL SYSTEM 2 (ICS2) – RELEASE 1

The goal of the UCC Import Control System 2 (ICS2) programme is to strengthen the safety and security of the supply chain for goods moved via all modes of transport. The aim is to do so through better targeted risk based controls of EU customs authorities on improved Entry Summary Declaration (ENS) data quality, data filing, data availability and data sharing and through real-time collaborative risk analysis and co-ordinated safety and security controls at the EU entry points. The main purpose of the system is to implement the new requirements resulting from the UCC and strategic objectives endorsed by the Member States in the Risk management strategy and action plan of 2014.

In terms of planning, the programme will be implemented in three releases. Release 1 covers the obligation on the relevant economic operators (postal operators and express carriers in air transport) to provide the minimum data i.e. ENS pre-loading dataset. Release 2 will cover the implementation of new ENS obligations and related business and risk management processes for all the goods in Full Air (postal, express, cargo) traffic. At the same time Release 2 will include Safety and Security analytics capabilities delivering Offline analytics capabilities (Data Lab/ Risk List/ Risk Indication Enrichment Catalogue) and Online/Real Time Enrichment capabilities. Following a positive endorsement (‘Go decision’) by the Commission and the Member States in December 2020 the project activities have started. Release 3 will cover the very similar business process as Release, but for all goods in maritime and inland waterways, road and rail traffic (this also includes goods in postal consignments transported in these means of transport). Please see Section 4.3 for the detailed status of Releases 2 and 3.

The first ICS2 release, ICS2 – Release 1 started operation on 15th of March 2021 with majority of National Entry System connected. Most of the economic operators had connected to the ICS2 Release 1 before the end of the Release 1 deployment window 01/10/2021. All remaining NES system and EO system has connected by the December 2021, with exception of UK (Northern Ireland). All national customs authorities have implemented customs risk management processes on the basis of the applicable common risk criteria and standards and in accordance with harmonised operational guidance. During the 6 months of EO deployment window it was observed that ENS data quality, completeness, its coverage and implementation of air cargo security referrals presented a challenge to affected economic operators (in particular in postal sector). These critical compliance issues had and will have to be continuously addressed in the coming months to ensure compliance with the new UCC requirements.

By the time of writing, ICS2 is used by 30 National Customs Administrations: All EU Member States, CH, NO and UK<sup>8</sup>. All Postal operators, including the postal operators of CH and NO, are connected to ICS2, apart from the UK postal operator, that is not operational<sup>9</sup>.

By end of December 2021 all national administrations (NAs) were fully operational.

### 2.1.9 Overview of Project Progress

Table 9 compares the actual dates to those set in the UCC Work Programme (WP).

Technical Specifications			Conformance Testing		Deployment		
Target date from WP	Actual End Date	2021 % of Completion	Actual End Date	2021 % of Completion	Target date from WP	Actual Date	2021 % of Completion
30/06/2018	01/09/2021	100%	05/09/2021	100%	15/03/2021	15/03/2021	100%

Table 9: Comparison of Planned and Actual Dates – ICS2 - Release1

<sup>8</sup> As part of implementation of the Protocol on Ireland and Northern Ireland;

<sup>9</sup> UK is currently not in operations due to the standstill arrangement during the ongoing discussions about the application of the Northern Ireland Protocol.

### 3. PROJECTS TO BE COMPLETED BY THE END OF 2022

#### 3.1 UCC NOTIFICATION OF ARRIVAL (AN), PRESENTATION NOTIFICATION (PN) AND TEMPORARY STORAGE (TS)

The goal of this project is to define the processes at the national level in respect to the notifications known as Notification of Arrival (AN), Presentation Notification (PN) and Declaration for Temporary Storage (TS), as described in the UCC. This project will ensure the customs formalities related to the entry of goods concerning safety and security exits and that customs supervision begins at the appropriate time and is duly performed. It also aims to support harmonisation across the Member States regarding the data exchange between trade and customs. Furthermore, the project covers the automation of processes at the national level.

The development activities related to this project are a national matter, with processes and data requirements for the external domain to be defined and agreed at EU level. In this light, the systems are planned to be operational by 31 December 2022 as defined in the UCC basic Regulation. If the deadline cannot be met, Member States are required to address this in writing to the European Commission and request a derogation as stated in Art 6(4) of the UCC. Member States will have to address a formal request, with a temporary nature<sup>10</sup>, stating a scope and a clear justification.

By the time of writing, several derogation letters were received from Member States for Notification of Arrival, Presentation Notification and Temporary Storage.

##### 3.1.1 Summary of Responses

#### *Notification of Arrival (AN)*

##### **Summary from the Commission:**

The development activities for this project are a national responsibility.

An expert group of Member States, ETCIT WP2 (Expert Team on new approaches to develop and operate Customs IT systems), financed by the Customs Programme, has engaged to establish the business process models and the legal/business/functional requirements for AN, PN and TS and to make this available to interested Member States.

In view of the legal deadline of 31/12/2022, the risks identified in the 2021 Annual Progress Report for the national entry projects were brought to the attention of the Directors General of the Customs Administrations with the demand to address the risks and ensure timely deployment.

Closer supervision was carried by DG TAXUD by means of collecting more frequent progress reporting from the Member States and organising a range of bilateral meetings with each Member State at CIO level.

##### **Summary from the Member States:**

The project is closely interlinked with other projects/systems such as the national import systems and the Import Control System 2 (ICS2). This is often reported by Member States as the reason for assessing the project as medium to highly complex. The following Member States reported to implement AN as part of ICS2 Release 2 (in particular through the EU Shared Trader Interface): AT, BG, CY, DE, EE, ES, FI, FR, HR, HU, LT, LV, NL, RO, PL, SE and SI. The following Member States are developing or have developed a national solution (often in conjunction with the National Import System): CZ, IT, MT, PT and SK. Some Member States did not provide any information in this respect.

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<sup>10</sup> By temporary nature it should be understood a limited and reasonable period of time, which will be assessed following the justification provided.

The timely delivery of the required national systems by all Member States was already at risk in last year's report. Additional delays in comparison with the UCC Annual Progress Report 2021 are noted, though several Member States reported that measures are taken to keep the deployment within the deadline. Some examples include changing the organisational setup with contractors to achieve a more effective development process and/or implementing an Agile development methodology to reduce the implementation timeframe.

Recurrently identified causes of delay related to the project are: the interdependencies between core and supporting systems, delays in public procurement procedure, dependencies with other stakeholders, the contractor's capacity and unexpected delays caused by the system development intrinsically. Other activities have taken resources, notably BREXIT for which important efforts had to be made to ensure the traffic flow at the borders.

Besides the complexity of the project per se, other reasons for potential delay are provided, such as resource constraints, both workforce and financially related, further adaptations to the UCC Annex B<sup>11</sup>, impact and re-planning due to the VAT eCommerce package<sup>12</sup> (which needed a new development, given the large volumes) and also the specific working circumstances caused by the COVID-19 pandemic. At the same time, many Member States have attributed the increased complexity level to parallel development of systems and to the many dependencies and stakeholders involved. Intense collaboration in the ETCIT expert group is ongoing in order to share expertise and resources amongst interested Member States and to join forces in the development work.

The above summary also applies to PN and TS.

#### **Important remark:**

Further to the planning and progress data collected from Member States and Commission services during Q1 and Q2 2022, new information has been communicated to the Commission which has not been represented in this accompanying staff working as it was not part of the methodological approach established for this document. They key information will be taken on board and reflected in the main Report itself.

Several Member States have submitted a written notification asking for derogation under Article 6(4) UCC to DG TAXUD concerning the delay for AN beyond the deadline 31/12/2022, regardless of the option made to implement the system with ICS2 Release 2. The derogation requests from the Member States were assessed by the Commission services in terms of the justifications provided by the specific situation of the Member States requesting it and in view of a set of common assessment criteria.

In this light the Commission has proposed an Implementing Decision<sup>13</sup> granting a derogation to Austria, Belgium, Bulgaria, Croatia, Cyprus, Czechia, Denmark, Estonia, France, Greece, Hungary, Luxembourg, Malta, Netherlands, Poland, Portugal, Romania, Slovakia, Slovenia, Spain and Sweden for the Notification of Arrival provided for in Article 133 of the Union Customs Code. The derogation is proposed to apply from 1 January 2023 until the deployment of the AN system, but not later than 31 December 2023 in respect of goods entering the customs territory of the Union by air, and 1 March 2024 in respect of goods entering the customs territory of the Union by maritime transport or inland waterways, whichever date is sooner. This differentiation by transport mode aligns with Release 2 and 3 of ICS2 respectively as the projects are closely linked.

#### **Detailed Responses<sup>14</sup>:**

*Table 10* provides the individual Member States' responses to the survey:

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<sup>11</sup> Annex B to Delegated Regulation (EU) 2015/2446 - regarding common data requirements, as amended by Delegated Regulation (EU) 2021/234;

<sup>12</sup> [Council Implementing Regulation \(EU\) 2017/2459 of 5 December 2017](#) (OJ L 348, 29.12.2017, p. 32–33);

<sup>13</sup> This reflects the state of play at the moment of the finalisation of the Report on 11 November 2022.

<sup>14</sup> Fields marked in grey mean that no information was provided on that specific topic.



MS	Complexity Rating	Risk Level	Additional Comments
AT	1	Low	AT indicated that AN will be lodged using the EU-Portal (STI) and CR and that a hybrid approach will be used, combining an agile development and the integration of the existing software solutions.
BE			
BG	5	Low	In the case of BG, AN will not be deployed as a separate project, being in line with ICS2 - Release 2 planning. Regarding the ICS2 - Release 2 national components development, Bulgarian customs administration is using an agile and an iterative approach. BG applies an adapted and combined implementation of two methodological frameworks –TOGAF/ADM and RUP.
CY	6	Med	In relation to NA/PN/TS, CY indicated <sup>15</sup> that these projects would follow the same plan as for the National Import System which envisaged publication of technical specifications on 30/07/2022, conformance testing between 08/03/2023 - 21/03/2023 and deployment into operation on 31/03/2023 in a “big bang” approach. A development contract has been signed and the dates have been agreed. At the same time, the decision to align the development to EUCDM 6.1 means that there will be a delay of three months involved, however it was considered that this was a better approach than updating to version 5.2 and then to 6.1 soon after. They intend to re-use a system already developed by their contractor and in use in another Member State so this should mean that they won’t experience any problems with implementation. According to the last updated information the development approach envisaged will be decided in cooperation with the contractor.
CZ	6	Med	CZ mentioned that several years ago a full computerization of customs systems took place. For example National Import System (NIS) incl. AN, PN, TS and interfaces with other systems (ICS, ECS, NCTS, GMS, NDS, ERIAN, ECDC, TARIC etc.) were deployed in November of 2010. Purposes of these many interfaces between NIS and other systems are automatic verification of various data elements in customs declarations in relation to data in other systems and transmission of information relevant to other systems. Most of the new processes based on UCC have already been incorporated into the systems in the past. Nowadays, the subject of development within the NIS modernization is mainly a change in the general data requirements in the formats and structure of individual data elements and data groups used in the existing electronic data messages. Due to the interconnectedness, the systems for AN, PN, TS, NIS and SP IMP are being developed and will be deployed in parallel. The high level of computerization and interconnection of customs systems in the Czech Republic that has existed in the past brings a negative impact to the present moment. Therefore, for further development that has a high degree of complexity in implementing changes in individual systems the impact will be translated in increased cost of personnel and/or financial resources. At the time of writing, the project is delayed due to the complexity of the system and the IT contractor related activities. Therefore, the deadline of publication of technical specifications will be postponed and the new indicative milestones in the National Project Plan (NPP) will be modified as follows: Technical Specifications = 01/08/2022, The period of Conformance Testing with Economic Operators = 01/11/2022-31/12/2022 and Deployment = 31/12/2022. CZ explained the background related to the technical specifications date being set for 01/08/2022, just 5 months before the deployment deadline date by stating that due to numerous UCC requirements and the need to update those systems accordingly and given the complex nature caused by the level of inter-

<sup>15</sup> According to the planning file which was sent to TAXUD on 16/03/2022.

MS	Complexity Rating	Risk Level	Additional Comments
			connection with many different systems, the date of publication of technical specifications had to be postponed.
DE	4	Low	Considering the applicability of deployment activities, this information will be updated in line with the ICS2 planning for Release 2 starting 01/03/2023 and implemented in a major release of the national IT-Systems ATLAS (Release 10.1). External Milestones affecting economic operators will be considered in line with the ICS2 planning for Release 2, especially in relation to the STI.
DK	4	Med	DK is facing a reprioritization of the Danish UCC program and the underlying projects reflected in the UCC Work Programme. Based on the initial phases of the implementation of the UCC there is a considerable risk that Denmark will not be able to meet all the deadlines in the UCC. This is due in part to the overall complexity of the task and the implementation schedule, and in part because the Danish national supplier has not been able to deliver the standard system at the expected quality and speed.
EE	4	High	AN will not be deployed as a separate project, being in line with ICS2 - Release 2 planning. EE advised that due to COVID-19 related financial challenges they had to postpone the ICS2 - Release 2 and AN project deadline. The new planned deployment date is 01/10/2023. Mitigating measures are under discussion with the Ministry of Finance.
ES	1	Low	ES indicated that they will be developing the AN with ICS2 R2 system, using an agile development approach.
FI	3	Med	FI indicated that the system will be implemented with ICS2 Release 2 on 01/03/2023 and that most of the Conformance Testing activities have been executed. However, due to system complexity milestones related to conformance testing and deployment activities will be impacted.
FR	5	Low	FR will use the application developed by BE and will deploy AN concomitantly with the release of ICS2-R2 (this applies for PN and TS as well). It was expressed that a delay of 6 months is expected for AN/PN/TS.
GR	6	High	GR explained that due to call for tender procedures, PN/AN/TS are at risk, having all milestones impacted. Internal discussions to assess and mitigate the situation are underway. No partial deployment is envisaged.
HR	6	High	HR indicated that Notification of Arrival is part of ICS2 specifications and will be deployed according to ICS2 deadlines for different modes of transport (R2 and R3).
HU	5	Med	HU advised that the implementation of AN/PN would in fact take place at the same time as ICS2 Release 2 in March 2023. HU is planning a full functionality deployment for AN.
IE	3	Low	IE explained that in accordance with Article 133 of the UCC, where the information on arrival is available to the customs authorities they may waive this notification. IE is already being provided with this information from their port and airport authorities and will not, therefore, require the operators to submit notifications of arrival. In this light, AN will not be applicable for IE and is currently examining how this will work with the Shared Trader Interface for ICS2.
IT	4	Low	The eManifest system in Italy covers the formalities for AN/PN/TS and they are working on the connection between this and ICS2 for the management of AN/PN. They plan publication of technical specifications for 01/06/2022, testing with traders between 05/09/2022 and 12/12/2022 followed by deployment on 13/12/2022.
LT	6	Med	LT expressed that AN will be aligned with ICS2 functionality (for which deadline for production is 01/03/2023). Considering this, if the EU system

MS	Complexity Rating	Risk Level	Additional Comments
			functionality will not be in place, national functionality will not be able to handle AN.
LU			
LV	4	Med	For Notification of Arrival, Latvia uses Port and Airport systems according to the Article 133 (2) of the UCC. AN and PN will be harmonized with the implementation of ICS2 R2 and R3. At the time of writing LV is managing the procurement procedure, having adopted an iterative development approach. In the risk spectrum, the development and Conformance Testing activities are being impacted.
MT	6	High	Due to numerous activities concerning various systems happening all in the same period the system is being delayed. Therefore, the upgraded National Import System will be deployed in around Q1/Q2, 2023 instead of Q4 2022. The launch of the Notification of Arrival will be coordinated with the launch of the upgraded NIS. The system will be deployed with full functionality.
NL	5	High	Regarding the AN/PN/TS projects, it was confirmed that the planning envisages the deployment along with ICS2 Release 2 on 01/03/2023. NL has decided to combine AN with ICS2 - Release 2, while using an agile development approach. This approach starts with describing a high level design of the requirements (features) and the IT-solution, in a so called "Epic" format.
PL	4	Low	AN/PN deployment will be linked to ICS2 Release 2. PL mentioned that both an agile and an iterative approach are going to be used for the system development.
PT	6	High	PT indicated that Technical Specifications Publication for EO, Conformance Testing and Deployment activities were postponed, due to the complexity of developments with ports and airports and due to the definition of a longer period for conformance testing activities. PT explained that the Notification of Arrival of the means of Transport is waived to the EO, under the terms of Article 133 of the UCC. The Administration receives the information regarding the arrival notification, sent by the airport managing authorities and the maritime authorities. Therefore, the new system has to be interconnected with the operational systems of ports and airports, adding complexity to the developments. At the same time, the integration with ICS2 R2 is also complex. Projects like Presentation Notification and Temporary Storage will be implemented in the same national system, integrated with several other systems (ICS2, NIS, Risk Management, Temporary Storage Facilities). Within mitigation measures PT mentioned: providing technical specifications as soon as possible to Traders and providing support, assistance and close training to all Traders and Port Authorities. An agile development will be used to reduce implementation timeframe and no partial deployment is envisaged. A delay of 9 to 12 months is being envisaged for AN/PN/TS/NIS and SP Component 2.
RO	6	Low	AN will be implemented along with ICS2 - Release 2. RO indicated that an agile approach is being used for the development of AN. However, in the derogation letter provided for DG TAXUD, it was indicated that for ICS2 Release 2 there will be a delay of maximum 7 months, but not more than the deployment window given to economic operators for their own system-to-system developments.
SE	3	Low	SE confirmed that they will use the ICS2 functionality for AN to be deployed on 01/03/2023 with full operation from 01/10/2023 for air transport (ICS2 Release 2) and for maritime in Q1 2025 (ICS2 Release 3). An iterative approach is being used for the system development.

MS	Complexity Rating	Risk Level	Additional Comments
SI	4	Low	SI is upgrading the existing electronic messages for AN, PN and the national TS system in accordance with Annex B IA/DA (G2, G3 and G4). AN/PN will be implemented at the same time with ICS2 Release 2 on 01/03/2023.
SK	1	High	Regarding AN/PN/TS and NIS, SK confirmed that they will be a year late with the deployment due to lack of human resources. They are currently performing analysis of the situation with their IT supplier and crisis manager. For the moment no mitigating measures are foreseen.

Table 10: Detailed responses from Member States – AN

Figure 1 provides the percentage of Member States in each development phase for AN.

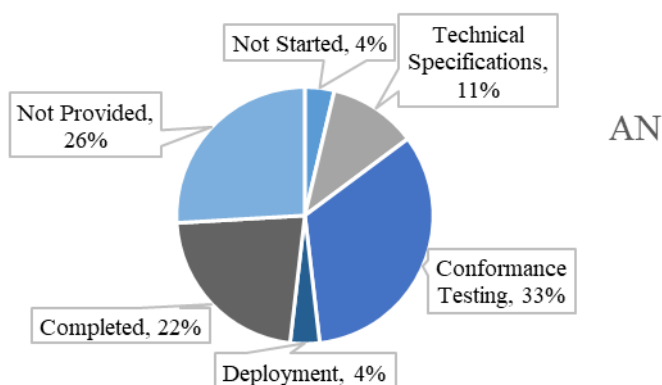


Figure 1: Project Status as per Survey – AN

## Presentation Notification (PN)

### Summary from the Commission:

The summary is the same as for AN.

### Summary from the Member States:

Please see also the summary from AN.

As regards the alignment of the system development with the data requirements in Annex B of the Commission Delegated Regulation (EU) 2015/2446 as amended by Delegated Regulation (EU) 2021/234, BG and IE mentioned that they plan to conform with the new requirements as of 31/10/2023, respectively 01/10/2023. All of the other MS that had provided additional comments in the table below have complied with the requirements of the new Annex B.

At the moment of writing BG, IE and LV have marked the project as complete, with the particularity that for BG which implemented PN as part of TS and their import declaration system based on requirements from Annex D to Delegated Regulation (EU) 2015/2446, the system will have to be updated by 31/10/2023.

DE explained that PN and TS will conform to the data requirements of the new Annex B as set out in the Delegated Act, not however for the moment with the formats and codes in the Implementing Act.

DE added that the Annex B (DA) requirements are being implemented in the existing national import systems so the deadline of 31/12/2022 can be achieved.

The other Member States that also reported to envisage PN implementation by end 2022 are: FI, IT, LT (see table 14 below and adjusted to the latest information available).

**Important remark:**

Further to the planning and progress data collected from Member States and Commission services during Q1 and Q2 2022, new information has been communicated to the Commission which has not been represented in this accompanying staff working as it was not part of the methodological approach established for this document. The key information will be taken on board and reflected in the main Report itself.

Several Member States have submitted a written notification asking for derogation under Article 6(4) UCC to DG TAXUD considering the delay for PN beyond the deadline 31/12/2022, regardless of the option made to implement the system with ICS2 Release 2. The derogation requests from the Member States were assessed by the Commission services in terms of the justifications provided by the specific situation of the Member States requesting it and in view of a set of common assessment criteria.

In this light the Commission has proposed an Implementing Decision<sup>16</sup> granting a derogation to Austria, Belgium, Croatia, Cyprus, Czechia, Denmark, Estonia, France, Greece, Hungary, Luxembourg, Malta, Netherlands, Poland, Portugal, Romania, Slovakia, Slovenia, Spain and Sweden for the Presentation Notification provided for in Article 133 of the Union Customs Code. The derogation is proposed to apply from 1 January 2023 until the deployment of the PN system, but not later than 31 December 2023 in respect of goods entering the customs territory of the Union by air, and 1 March 2024 in respect of goods entering the customs territory of the Union by maritime transport, inland waterways, road and rail transport, whichever date is sooner.

**Detailed Responses:**

Table 11 provides the individual Member States’ responses to the survey:

MS	Complexity Rating	Risk Level	Additional Comments
AT	4	Low	A hybrid approach will be used, combining an agile development and the integration of the existing software solutions.
BE			BE would like to give traders the opportunity to align with ICS2 in the utmost way. Therefore the plan is to go into production with PN/TS on 01/03/2023, however only for the transport modes covered by ICS2 Release 2 and expand to the other modes of transport as of ICS2 Release 3.
BG	5	Low	Presentation Notification was implemented as part of Temporary Storage and import declaration system. PN/TS update has been in production since January 2019 aligned to requirements at that time. A plan to update the national import systems to the new Regulation 2021/234 is ongoing with a deadline set for 31/10/2023. The implementation of IT projects is being made using the TOGAF/ADM and RUP methodologies.
CY	6	Med	Same response as for AN.
CZ	6	Med	Same response as for AN.
DE	4	Low	DE indicated that the 2021 national planning was updated following the national planning update for the UCC Work Programme sent on 03/02/2022.
DK	4	Med	Same response as for AN.

<sup>16</sup> This reflects the state of play at the moment of the finalisation of the Report on 11 November 2022.

MS	Complexity Rating	Risk Level	Additional Comments
EE	5	Med	EE implemented timely the national system, but the migration of all economic operators would be gradual and ending beyond the deadline of 31 December 2022. EE draws the attention on the fact that PN is closely linked to ICS2, therefore the project deadlines should be amended accordingly, meaning that the end date of the deployment window of PN for traders (EO) will be 01/03/2024. Estonia has deployed Temporary Storage/Presentation Notification (TS/PN) systems. However, not all traders will be using TS/PN system from the 1st of January 2023. The deadlines for TS and ICS2 are being synchronized (mainly because of the datasets). In that case, traders dealing with air cargo would migrate at the latest accordingly to the national deployment date of ICS2 release 2 and other traders accordingly to the ICS2 release 3.
ES	6	High	Data changes in the Annex B and other ongoing UCC projects have delayed the completion of the Technical Specifications which poses a high risk of delay on the activities related to EO and the port systems. In this context, a full deployment is expected only in 2024, namely 15/03/2024. There are several reasons for delays including the complexity of implementing the changes in their environment, the number of projects running in parallel and managing the changes with the traders. The current PN contains a reference to the ENS, however there are no issues envisaged regarding the ICS2 process.
FI	4	Med	According to Finland, PN is already in operation.
FR	5	Low	Same response as for AN.
GR	6	High	Same response as for AN.
HR	6	High	Same response as for AN.
HU	5	Med	Same response as for AN.
IE	6	Low	PN & TS had already been implemented in November 2020.
IT	4	Low	Same response as for AN.
LT	6	Med	Same response as for AN.
LU			
LV	5	Med	LV expressed that the level of complexity is increased due to numerous and complicated projects that are ongoing at the same time. For Notification of Presentation LV uses TSD for goods arriving by air (according to the Article 145 (8) of the UCC) and Port system administered by the Ministry of Transport for goods arriving by maritime transport (according to the Article 190 of IA of the UCC) where notification for unloading (incl. PN data set) is submitted. The process will be harmonised along with the implementation of ICS2 R2 and R3. At the time of writing LV is managing the Procurement procedure, having adopted an iterative development approach. In the risk spectrum, the Development and Conformance Testing activities of the system are being impacted.
MT	5	High	Same response as for AN.
NL	5	High	Same response as for AN.
PL	4	Low	PL mentioned that there are many provisions for presenting goods throughout the UCC, in various configurations and different procedures, for pre-presentation declarations, both in standard and simplified declarations. Taking into account the above-mentioned scope of regulations, Poland emphasized that their focus is on the presentation for ICS2 purposes and on the Free Zones (G3 and G4 in AIS / IMPORT PLUS).



MS	Complexity Rating	Risk Level	Additional Comments
			Regarding the development method, both an agile and an iterative approach are being used for the system development.
PT	6	High	Same response as for AN.
RO	6	Med	RO indicated in their last updated that currently they are staged at completion of procurement procedure. At the same time, they explained that PN, TS and Special Procedures Component 2 are included in the project of development of the national system of import and follows the implementation established for that system. In their derogation letter, RO mentioned a possible delay of 6 months from the deadline (31/12/2022) for NIS, NSP IMP, PN and TS.
SE	4	Med	According to SE, the solution for PN for postal consignments is in production since September 2021. The deployment for the other modes of transport will begin as of 01/03/2023. One of the considered options is the re-use of the ENS. The operational date will follow for each transport mode for ICS2, while bearing a risk for delay with the traders. Concerning the maritime sector, there is the dependency with the EMSW and deployment in August 2025. Concerning the NO border, there is a dependency to the Smart Border project and how to manage a smooth transition to a new process. SE informed that they are going to use the application developed by BE in the ETCIT co-operation. SE are at the moment analysing and considering the most efficient way to integrate the application into the existing IT infrastructure, bearing in mind the alternative of investigating the possibility to use a national application at least to a certain extent.
SI	4	Low	Same response as for AN.
SK	1	High	Same response as for AN.

Table 11: Detailed responses from Member States – PN

Figure 2 provides the percentage of Member States in each development phase for PN.

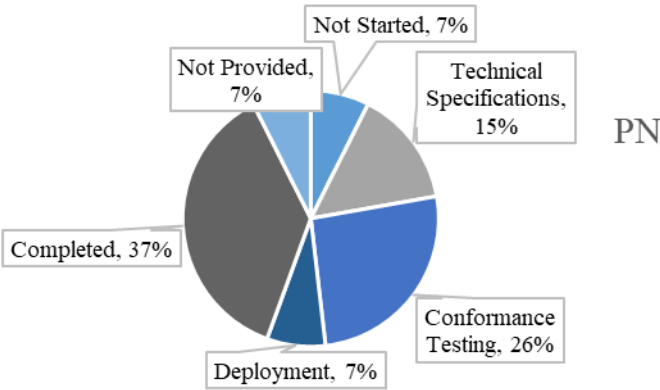


Figure 2: Project Status as per Survey – PN

## Temporary Storage (TS)

### Summary from the Commission:

The summary is the same as for AN.

### Summary from the Member States:

Please see also the summary from PN.

BG implemented PN and TS as part of their national import declaration system. As it was implemented based on requirements from Annex D to Delegated Regulation (EU) 2015/2446, it will be updated by 31/10/2023. All of the other MS that had provided additional comments in the table below<sup>17</sup> have complied with the requirements of the new Annex B.

DE explained that AN, PN and TS will conform to the data requirements of the new Annex B as set out in the Delegated Act by end 2022, not however for the moment with the formats and codes in the Implementing Act. DE added that the Annex B (DA) requirements are being implemented in the existing national import systems so the deadline of 31/12/2022 is considered to be achieved.

The other Member States that also reported to envisage TS implementation by end 2022 are: FI, IE, IT and LV (see table 15 below and adjusted to the latest information available).

### Important remark:

Further to the planning and progress data collected from Member States and Commission services during Q1 and Q2 2022, new information has been communicated to the Commission which has not been represented in this accompanying staff working as it was not part of the methodological approach established for this document. The key information will be taken on board and reflected in the main Report itself.

Several Member States have submitted a written notification asking for derogation under Article 6(4) UCC to DG TAXUD considering the delay for TS beyond the deadline 31/12/2022, regardless of the option made to implement the system with ICS2 Release 2. The derogation requests from the Member States were assessed by the Commission services in terms of the justifications provided by the specific situation of the Member States requesting it and in view of a set of common assessment criteria.

In this light the Commission has proposed an Implementing Decision<sup>18</sup> granting a derogation to Austria, Belgium, Croatia, Cyprus, Czechia, Denmark, Estonia, France, Greece, Hungary, Lithuania, Luxembourg, Malta, Netherlands, Poland, Portugal, Romania, Slovakia, Slovenia, Spain and Sweden for the Temporary Storage referred to in Article 145 of the Union Customs Code. The derogation is proposed to apply from 1 January 2023 until the deployment of the TS system, but not later than 31 December 2023 in respect of goods entering the customs territory of the Union by air, and 1 March 2024 in respect of goods entering the customs territory of the Union by maritime transport or inland waterways, road or rail transport, whichever date is sooner.

### Detailed Responses:

Table 12 provides the individual Member States' responses to the survey:

MS	Complexity Rating	Risk Level	Additional Comments
AT	6	High	Same response as for PN.
BE			Same response as for PN.
BG	5	Low	Same response as for PN.
CY	6	Med	Same response as for PN.
CZ	6	Med	Same response as for PN.

<sup>17</sup> Idem<sup>12</sup>.

<sup>18</sup> This reflects the state of play at the moment of the finalisation of the Report on 11 November 2022.



MS	Complexity Rating	Risk Level	Additional Comments
DE	4	Low	<p>Regarding the Conformance Testing, this "message" is updated as part of "National Entry System" of the national IT-System ATLAS (Release 9.1) for which the Economic Operator is allowed to carry out migration from 01/05/2021 until 14/10/2022.</p> <p>DE indicated that the data model is not in line with EU-CDM (FMS) and will be updated following the approach of CCI and the national import system being the basis for the new and modernized import application. The electronic message is aligned with the data requirements of the new Annex B as set out in the Delegated Act, however for the moment with the formats and codes in the Implementing Act.</p> <p>The 2021 national planning was updated following the national planning for the UCC Work Programme sent on 03/02/2022.</p>
DK	6	High	<p>DK is facing a reprioritization of the Danish UCC program and the underlying projects reflected in the UCC Work Programme. Based on the initial phases of the implementation of the UCC there is a considerable risk that Denmark will not be able to meet all the deadlines in the UCC. This is due in part to the overall complexity of the task and the implementation schedule, and in part because the Danish national supplier has not been able to deliver the standard system at the expected quality and speed.</p> <p>Mitigation measures include change of organizational setup with the supplier in terms of staffing and teams, primarily in order to achieve a more effective development process and to also achieve deeper understanding of the standard software at earlier stages of the proces to avoid problems.</p> <p>Furthermore, initiatives in order to secure more robust releases/deployment processes of standard software have been initiated in order to lower waiting time in relation to configuration and testing. DK informed that Conformance Testing is under planning and the possibility to use a partial deployment approach with limited functionality is being analysed.</p>
EE	5	Med	Same response as for PN.
ES	6	High	Same response as for PN.
FI	6	High	FI explained that the system deployment is on target, with an estimated deployment date set for 01/03/2023.
FR	5	Low	Same response as for PN.
GR	6	High	Same response as for PN.
HR	5	High	<p>HR explained that the deployment for TS is delayed beyond UCC deadline due to project complexity and dependencies with other projects and stakeholders. An additional contributing factor was the decision to align NA, PN and TS timeline with ICS2 R2. AN was already part of ICS2 specifications and HR made the decision that by end of 2021/beginning of 2022 to also deploy PN as part of ICS2. As a result the deployment of TS was aligned with the deployment of AN and PN (01/03/2023). Additional factors for delays were the COVID19 pandemic and overload of business and IT staff due to engagement of same teams in multiple UCC IT projects.</p> <p>HR indicated that no mitigation actions have been considered in the reporting period and that according to the current state of the progress the timely development of the economic operators systems is the most impacted.</p> <p>Future activities include the publication of Technical Specifications by the end of Q1 2022 and the completion of Conformance Testing in Q4 2022/Q1 2023.</p>
HU	5	Med	According to HU, TS will be delayed, having the new deadline set for 30/09/2024. HU submitted a derogation request letter in this regard.
IE	6	Low	Same response as for PN.
IT	4	Low	Same response as for PN.

MS	Complexity Rating	Risk Level	Additional Comments
LT	6	High	LT explained that regarding the current planning and progress, a delay of 12 months is envisaged for the system deployment, with the main reason expressed being the complex and time consuming service procurement procedures. Within mitigating measures foreseen are discussions with the contractor.
LU			
LV	4	Low	As from 24/09/2017 Temporary Storage has been updated according to the UCC data elements. Additional functionality for movements between TS places (if located in Latvia) has been added on 05/03/2018. The system's updated version according to the latest changes of EUCDM is in production starting 15/02/2022.
MT	5	High	Same response as for PN.
NL	5	High	Same response as for PN. In addition, NL is considering to combine TS maritime with ICS2 – Release 3 in 2024, as requested by trade.
PL	4	Low	According to PL some projects are being developed as a component within their national import system e.g. TS, SP Component 2(IMP), PoUS.
PT	6	High	PT indicated that the national system that will cover the AN, PN and TS projects is an integrated system with many other features in addition to the NA, PN and TS. The system integrates all the information regarding the entry and exit of means of transport (air and sea), and also the entry and exit of goods (import/export manifest). This national system also includes the control of ETD, RSS and ACP authorizations, in the import/export manifest. At the entry of goods, the system will be integrated with ICS2, the risk management system and the national import system. At the exit of goods, the system will be integrated with AES 1 and AES 2, and the risk management system, to control the exit of goods, with automatic exit certification for export. At the same time, on maritime traffic, the customs system is interconnected with the system of the port authorities, in a single window environment similar to EMSW, requiring that the port system will be completely reformulated to follow the developments of UCC WP. Temporary Storage will be implemented in the same national system, integrated with several other systems (ICS2, NIS, Risk Management, Temporary Storage Facilities). Milestones related to Technical Specifications Publication for EO, Conformance Testing and Deployment were postponed, due to the complexity of developments, and due to the definition of a longer period for conformance testing activities. An agile development approach is envisaged in order to reduce implementation timeframe and no partial deployment approach will be used given the high level of integration with different systems (ICS2, National Import System, Risk Management System, Temporary Storage Facilities systems, Ports Authorities and Airport Authorities). A delay of 9 to 12 months is being envisaged for AN/PN/TS/NIS and SP Component 2.
RO	6	Med	Same response as for PN.
SE	4	Med	SE is going to use the application developed by BE in the ETCIT co-operation. At the moment the SE team is analysing and considering the most efficient way to integrate the application into the existing IT infrastructure and still considering as an alternative the possibility to use a national application at least to a certain extent.
SI	4	Low	Same response as for PN.
SK	1	High	Same response as for PN.

Table 12: Detailed responses from Member States – TS

Figure 3 provides the percentage of Member States in each development phase for TS.

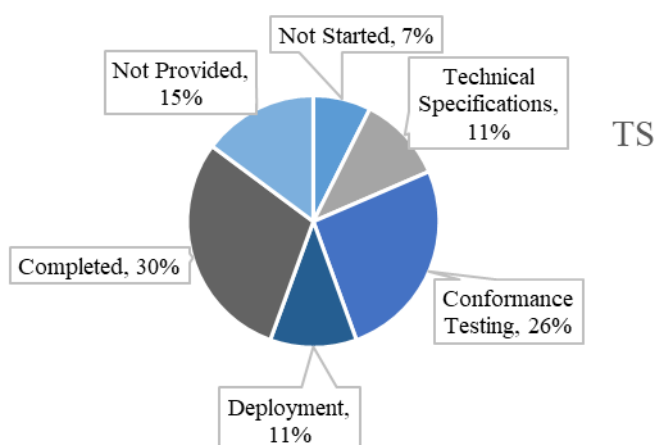


Figure 3: Project Status as per Survey – TS

### 3.1.2 Overview of Project Progress

Table 13, Table 14 and Table 15<sup>19</sup> highlight any known divergences in the planning compared to the dates set in the Work Programme. As this project has a deployment window, the ‘Deployment’ and ‘Operations’ columns are shown. If there is a difference in these two dates, this implies that a migration period is planned.

Further to the planning and progress data collected from Member States and Commission services during Q1 and Q2 2022, new information has been communicated to the Commission which has not been represented in this accompanying staff working as it was not part of the methodological approach established for this document. Some dates might have been adjusted by Member States in the light of the derogation requests and the derogation decisions.

The key information will be taken on board and reflected in the main Report itself.

<sup>19</sup> For delays less than 6 months, the deployment and/or the operation dates will be marked in orange. Delays exceeding 6 months will be marked in red.

In regards to the implementation of the *Notification of Arrival*, the following Member States have a planned operations date that is later than the deadline in the UCC Work Programme: AT, BG, BE, CY, EE, ES, FI, FR, DE, GR, HU, LU, LT, MT, NL, PL, PT, RO, SE, SI and SK. DK and HR did not provide information. Please note that the dates of operations reflected in the table below indicate the full implementation of the project. Some Member States decided to deliver the project in several iterations or releases, linked to the ICS2 Releases.

The specific dates can be found in *Table 13*.

Respondee	Technical Specifications			Conformance Testing		Deployment (Start of the deployment window)			Operations (End of the deployment window)	
	Target date	2022 Planned/	2022 % of	2022 Planned/	2022 % of	Target date	2022 Planned/	2022 % of	Target date	2022 Planned/
AT	01/11/2021	N/A	N/A	N/A	N/A		01/03/2023	N/A		01/03/2023
BE	Not provided	Not provided	Not provided	Not provided	Not provided		Not provided	Not provided		01/03/2023
BG	31/03/2022	100%	100%	15/12/2022	100%		01/03/2023	0%		01/03/2023
CY	30/07/2022	100%	100%	21/03/2023	0%		31/03/2023	0%		31/03/2023
CZ	01/09/2022	100%	100%	31/12/2022	Not started		31/12/2022	100%		31/12/2022
DE	N/A	N/A	N/A	N/A	N/A		N/A	N/A		02/10/2023
DK	Not provided	70%	70%	Not provided	70%		Not provided	70%		Not provided
EE	N/A	40%	40%	N/A	0%		03/10/2023	0%		03/10/2023
ES	N/A	N/A	N/A	N/A	N/A		01/03/2023	N/A		02/10/2023
FI	30/06/2022	100%	100%	Not provided	95%		31/03/2023	95%		31/03/2023
FR	31/03/2022	100%	100%	31/12/2022	0%		31/12/2022	0%		01/06/2023
GR	30/06/2021	50%	50%	N/A	N/A		31/12/2022	0%		01/01/2025
HR	Not provided	100%	100%	Not provided	20%		Not provided	85%		Not provided
HU	30/06/2022	100%	100%	30/11/2022	100%		01/03/2023	100%	31/12/2022	01/03/2023
IE	N/A	N/A	N/A	N/A	N/A		N/A	N/A		N/A
IT	15/07/2020	100%	100%	15/11/2021	100%		31/12/2021	100%		31/12/2022
LT	01/06/2020	100%	100%	30/11/2022	100%		31/12/2022	100%		31/12/2022
LU	14/12/2021	Not provided	Not provided	20/02/2023	Not provided		01/03/2023	Not provided		01/03/2023
LV	05/06/2017	100%	100%	22/09/2017	100%		24/09/2017	100%		25/09/2017
MT	31/03/2022	100%	100%	Not provided	0%		15/11/2022	75%		01/03/2023
NL	31/12/2021	100%	100%	15/09/2023	N/A		01/11/2023	0%		01/06/2024
PL	01/01/2023	100%	100%	30/09/2023	0%		01/12/2023	0%		01/12/2023
PT	31/07/2022	100%	100%	31/07/2023	40%		30/11/2023	0%		01/12/2023
RO	30/11/2021	Not provided	Not provided	31/01/2023	Not provided		01/03/2023	Not provided		30/09/2023
SE	N/A	N/A	N/A	Not provided	0%		01/03/2023	0%		31/03/2025
SI	01/10/2022	100%	100%	01/02/2023	100%		01/03/2023	100%		01/03/2023
SK	01/12/2022	0%	0%	01/11/2023	0%		01/12/2023	0%		01/12/2023

Table 13: Comparison of Planned and Actual Dates – AN<sup>20</sup>

<sup>20</sup> Several dates provided may differ given the derogation process undergoing.

In regards to the implementation of the **Presentation Notification**, the following Member States have indicated a planned operations date for PN, which is later than the deadline in the Work Programme: AT, BE, CY, EE (deployment on time), ES, FR, GR, HU (deployment on time), HR, LU, MT, NL, PL, PT, RO, SE, SI and SK. Please note that the dates of operations reflected in the table below indicate the full implementation of the project. Some Member States decided to deliver the project in several iterations or releases, linked to the ICS2 Releases.

The specific dates can be found in *Table 14*.

Respondee	Technical Specifications			Conformance Testing		Deployment (Start of the deployment window)			Operations (End of the deployment window)	
	Target date from WP	2022 Planned/ Actual End Date	2022 % of Completion	2022 Planned/ Actual End Date	2022 % of Completion	Target date from WP	2022 Planned/ Actual Date	2022 % of Completion	Target date from WP	2022 Planned/ Actual Date
AT	To be defined by MS and for Notification of Arrival in line with ICS2 planning	01/11/2021	90%	N/A	0%	To be defined by MS as part of the national plan	01/03/2023	0%	31/12/2022	01/03/2023
BE		12/10/2021	Not Provided	01/03/2023	Not Provided		01/03/2023	Not Provided		01/03/2023
BG		28/02/2018	100%	01/12/2018	100%		07/01/2019	100%		07/01/2019
CY		30/07/2022	100%	21/03/2023	0%		31/03/2023	0%		31/03/2023
CZ		01/09/2022	100%	31/12/2022	100%		31/12/2022	100%		31/12/2022
DE		09/10/2020	100%	14/10/2022	50%		06/03/2021	100%		31/10/2022
DK		01/03/2021	70%	01/06/2021	70%		01/06/2021	70%		01/07/2021
EE		31/12/2020	Not Provided	31/12/2023	100%		15/03/2021	100%		01/03/2024
ES		30/06/2022	100%	15/03/2024	0%		15/03/2024	0%		16/09/2024
FI		01/03/2020	100%	12/03/2021	100%		15/03/2021	100%		31/03/2021
FR		30/06/2022	100%	30/06/2022	75%		01/03/2023	0%		01/06/2023
GR		30/06/2021	50%	N/A	N/A		31/12/2022	0%		01/01/2025
HR		01/04/2022	100%	31/12/2022	20%		01/03/2023	85%		Not provided
HU		30/06/2022	100%	30/11/2022	100%		31/12/2022	100%		01/03/2023
IE		04/10/2019	100%	04/10/2021	100%		23/11/2020	100%		05/10/2021
IT		15/07/2020	100%	15/11/2021	100%		31/12/2021	100%		31/12/2022
LT		01/07/2022	100%	30/11/2022	100%		31/12/2022	100%		31/12/2022
LU		14/12/2021	Not Provided	20/12/2022	Not Provided		10/01/2023	Not Provided		10/01/2023
LV		05/06/2017	100%	22/09/2017	100%		24/09/2017	100%		25/09/2017
MT		31/03/2022	100%	N/A	N/A		15/11/2022	75%		01/03/2023
NL	01/09/2022	100%	15/09/2023	N/A	01/11/2023	0%	01/06/2024			
PL	01/01/2023	90%	30/09/2023	40%	01/12/2023	50%	01/12/2023			
PT	31/07/2022	100%	31/07/2023	40%	30/11/2023	0%	01/12/2023			
RO	31/03/2022	0%	31/12/2022	0%	31/12/2022	0%	30/06/2023			
SE	30/09/2022	100%	01/03/2024	0%	01/03/2023	0%	01/03/2023			
SI	01/10/2022	100%	01/02/2023	100%	01/03/2023	100%	01/03/2023			
SK	01/12/2022	0%	01/11/2023	0%	01/12/2023	0%	01/12/2023			

Table 14: Comparison of Planned and Actual Dates – PN<sup>21</sup>

<sup>21</sup> Idem 21.

In regards the implementation of the **Temporary Storage declaration**, the following Member States have indicated a planned operations date for TS, which is later than the deadline in the Work Programme: BE, CY, ES, FR, GR, HR, LT, LU, MT, NL, PL, PT, RO, SE, SI and SK. AT and DK did not provide information. Some Member States decided to deliver the project in several iterations or releases, linked to the ICS2 Releases.

Respondee	Technical Specifications			Conformance Testing		Deployment (Start of the deployment window)			Operations (End of the deployment window)	
	Target date from WP	2022 Planned/ Actual End Date	2022 % of Completion	2022 Planned/ Actual End Date	2022 % of Completion	Target date from WP	2022 Planned/ Actual Date	2022 % of Completion	Target date from WP	2022 Planned/ Actual Date
AT		Not Provided	Not Provided	Not Provided	Not Provided		Not Provided	Not Provided		Not Provided
BE		12/10/2021	Not Provided	01/03/2023	Not Provided		01/03/2023	Not Provided		01/03/2023
BG		28/02/2018	100%	01/12/2018	100%		07/01/2019	100%		07/01/2019
CY		30/07/2022	100%	21/03/2023	0%		31/03/2023	0%		31/03/2023
CZ		01/09/2022	100%	31/12/2022	100%		31/12/2022	100%		31/12/2022
DE		09/10/2020	100%	14/10/2022	50%		06/03/2021	100%		31/10/2022
DK		Not Provided	100%	N/A	N/A		Not provided	70%		Not provided
EE		31/12/2020	Not Provided	31/12/2023	100%		01/07/2021	100%		01/07/2021
ES		30/06/2022	100%	15/03/2024	0%		15/03/2024	0%		16/09/2024
FI		02/11/2020	100%	Not Provided	100%		31/12/2022	Not Provided		30/09/2022
FR	To be defined by MS and for Notification of Arrival in line with ICS2 planning	30/06/2022	100%	30/09/2022	75%	To be defined by MS as part of the national plan	31/12/2022	0%	31/12/2022	01/06/2023
GR		30/06/2021	50%	N/A	N/A		31/12/2022	0%		01/01/2025
HR		31/03/2022	100%	28/02/2023	90%		01/12/2022	Not Provided		Not Provided
HU		30/06/2022	100%	30/11/2022	100%		31/12/2022	100%		31/12/2022
IE		04/10/2019	100%	04/10/2021	100%		23/11/2020	100%		05/10/2021
IT		15/07/2020	100%	15/11/2021	100%		31/12/2021	100%		31/12/2022
LT		04/05/2023	80%	01/12/2023	0%		01/12/2023	0%		01/12/2023
LU		14/12/2021	Not Provided	20/12/2022	Not Provided		10/01/2023	Not Provided		10/01/2023
LV		05/06/2017	100%	22/09/2017	100%		24/09/2017	100%		25/09/2017
MT		31/03/2022	100%	Not Provided	50%		15/11/2022	50%		01/03/2023
NL		01/09/2022	100%	N/A	N/A		01/11/2023	0%		01/06/2024
PL		01/01/2023	90%	30/09/2023	10%		01/12/2023	10%		01/12/2023
PT		31/07/2022	100%	31/07/2023	40%		30/11/2023	0%		01/12/2023
RO		31/03/2022	Not Provided	31/12/2022	Not Provided		31/12/2022	Not Provided		30/06/2023
SE		Not Provided	0%	Not Provided	0%		01/10/2024	0%		15/08/2025
SI		01/10/2022	100%	01/02/2023	100%		01/03/2023	100%		01/03/2023
SK		01/12/2022	0%	01/11/2023	0%		01/12/2023	Not Provided		01/12/2023

Table 15: Comparison of Planned and Actual Dates – TS <sup>22</sup>

22 Idem 22.

Regarding the **Notification of Arrival**, additional details regarding the specific percentage of completion per milestone can be seen in Figure 4.

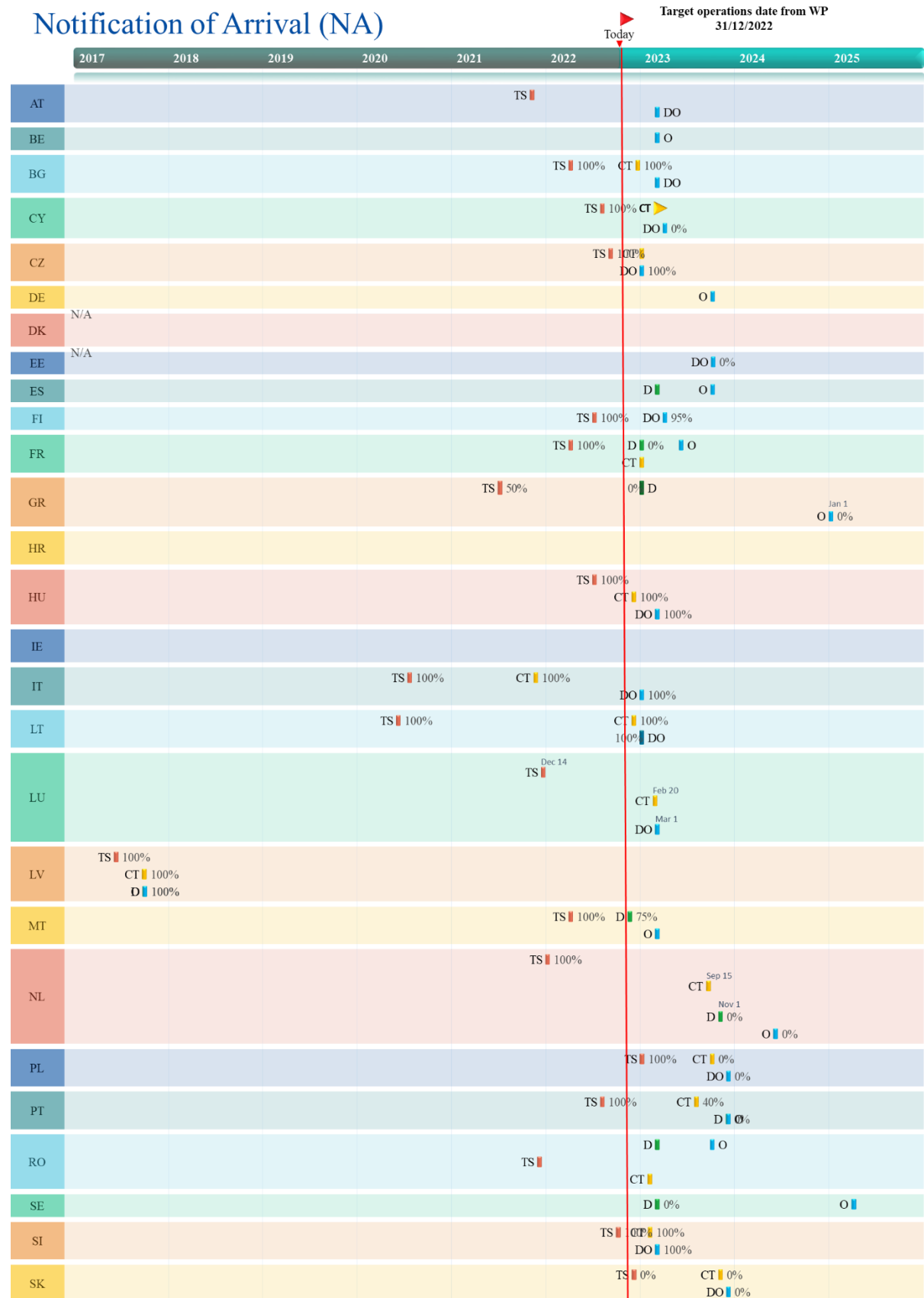


Figure 4: Percentage of Completion per Phase – AN

Regarding the **Presentation Notification**, additional details regarding the specific percentage of completion per milestone can be seen in Figure 5.

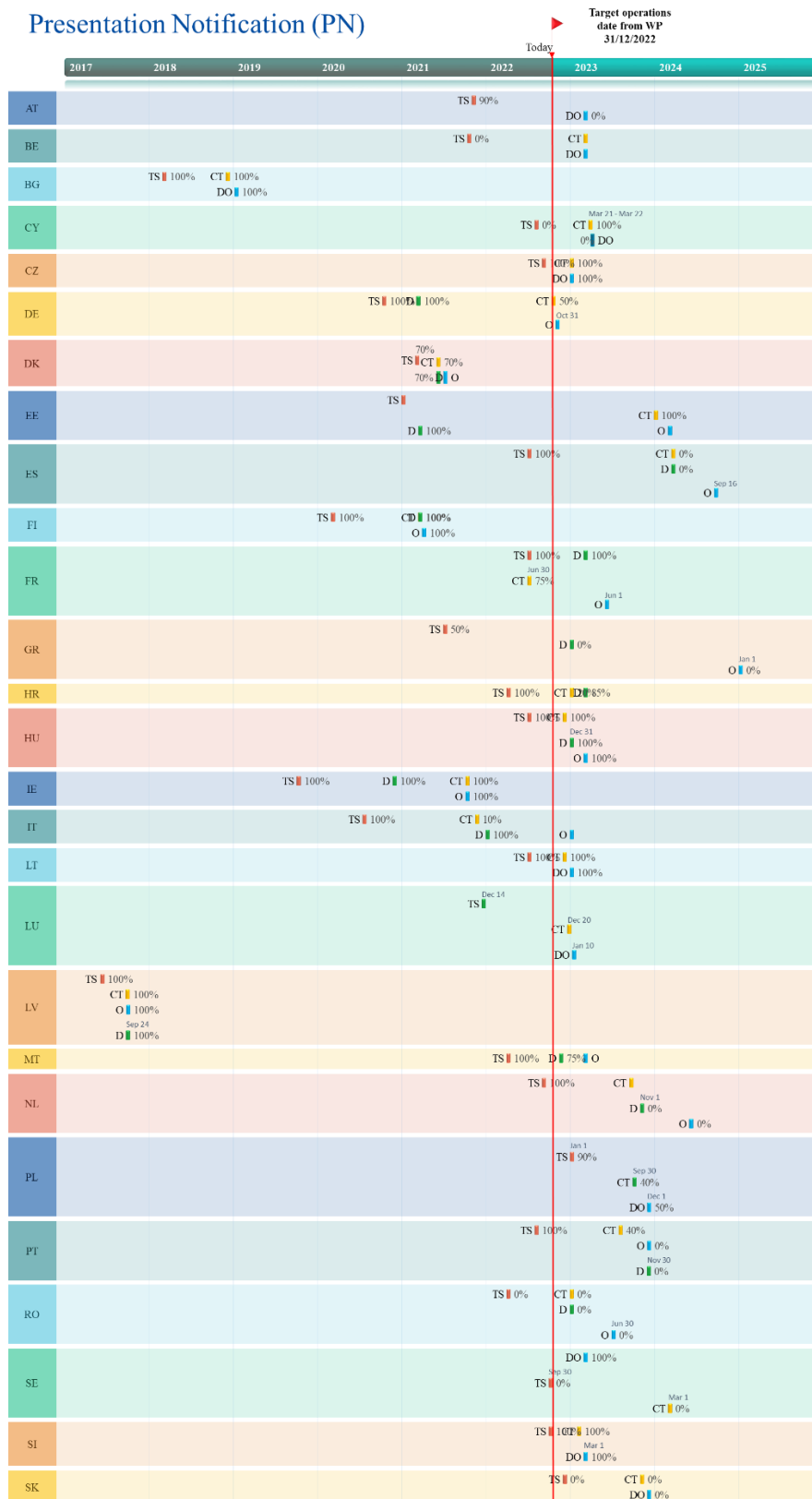


Figure 5: Percentage of Completion per Phase – PN



Regarding **Temporary Storage**, additional details regarding the specific percentage of completion per milestone can be seen in Figure 6.

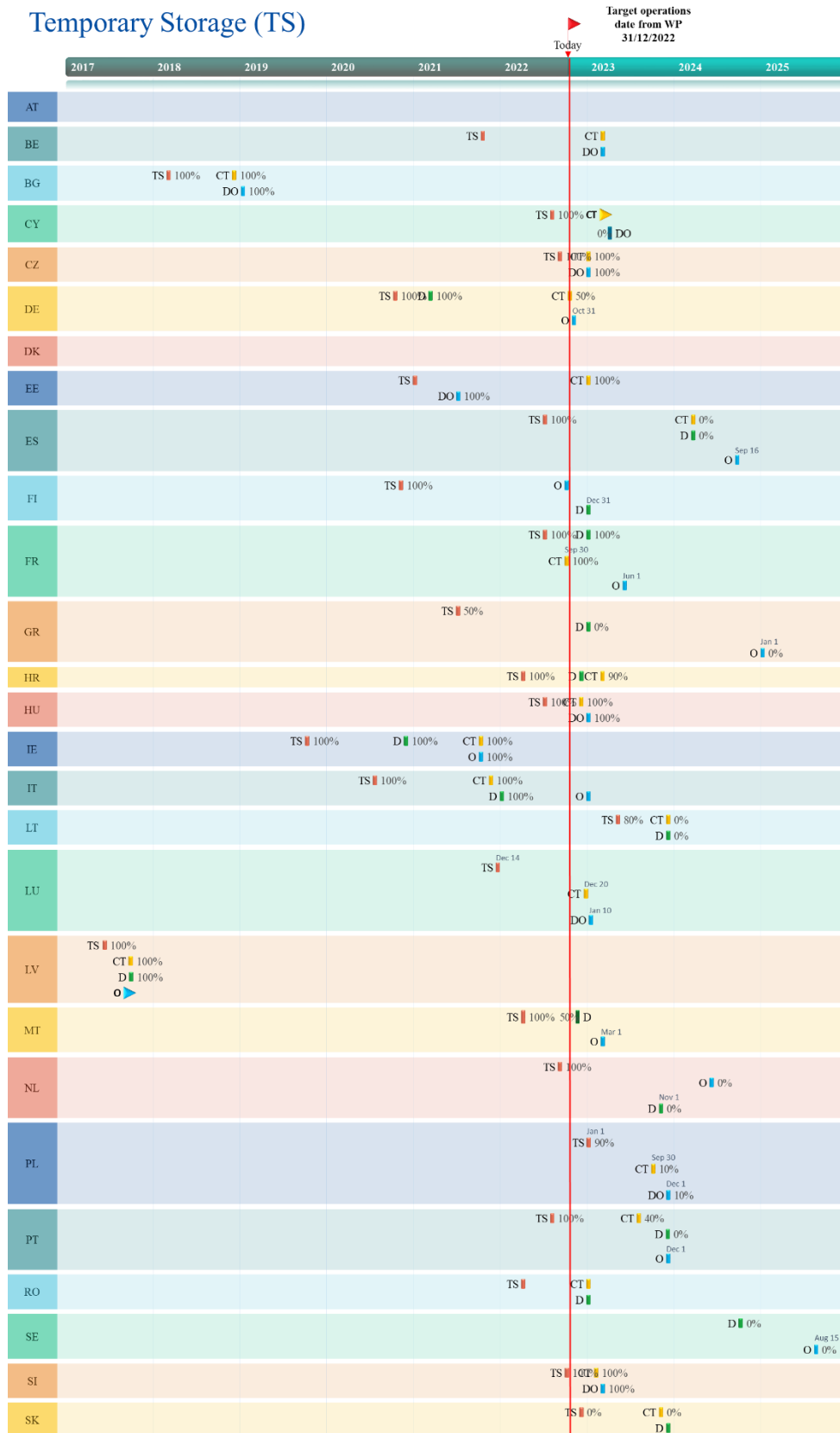


Figure 6: Percentage of Completion per Phase – TS

### **3.2 UCC NATIONAL IMPORT SYSTEMS (NIS) UPGRADE**

The project will implement all processes and data requirements deriving from the UCC, which relate to the import of goods into the Union. The existing national import systems must be upgraded in line with these new UCC requirements within the legal deployment deadline until the end of 2022. The development activities related to this project are a national matter, with processes and data requirements for the external domain to be defined and agreed at EU level. If the deadline cannot be met, Member States are required to address this in writing to the European Commission and request a derogation as stated in Art 6 (4) of the UCC. Member States will have to address a formal request, with a temporary nature<sup>23</sup>, stating a scope (UCC articles) and a clear justification.<sup>24</sup>

The upgrade mainly relates to:

- a) Changes to support the different possibilities for lodging a customs declaration (e.g. standard, simplified, including pre-lodged one, declaration made through entry in the declarant's records, supplementary) and its processing in the customs systems;
- b) Changes for Centralised clearance at national level;
- c) Changes related to the exchange of information;
- d) Adjustments of the respectful messages with the datasets in Annex B to UCC DA/IA;
- e) The impact of changes in other electronic systems at national level.

#### **3.1.3 Summary of Responses**

##### **Summary from the Commission:**

The availability of the technical specifications provided by DG TAXUD for the Centralised Clearance at Import system and the harmonisation across entry/import-transit-export/exit (supported by the revision of the UCC annex B data requirements and the EU Customs Data Model) were crucial achievements to push this project forward on a national level.

Following the finalisation and acceptance of the Technical Specifications for CCI Phase 1 and Functional Specifications for CCI Phase 2, the Commission has received enquiries from the Member States related to CCI specifications and their reusability for the NIS's upgrade.

DG TAXUD provided timely support to Member States for their developments on the National Import Systems. Therefore, a documentation package was issued on the reuse of CCI specifications and a support function was established in DG TAXUD for legal, procedural and technical issues.<sup>25</sup>

In view of the legal deadline of 31/12/2022, the risks identified in the 2021 Annual Progress Report for the national import system (and the related projects such as special procedures at import) were brought to the attention of the Directors General of the Customs Administrations with the demand to address the risks and ensure timely deployment. Member States were encouraged to submit requests for funding under the Recovery & Resilience Fund to help with customs IT work, however, not many of them have requested support.

Since mid 2021, closer supervision was carried by DG TAXUD by means of collecting more frequent progress reporting from the Member States and organising a range of bilateral meetings in 2022 with each Member State at CIO level.

##### **Summary from the Member States:**

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<sup>23</sup> By temporary nature it should be understood a limited and reasonable period of time, which will be assessed following the justification provided.

<sup>24</sup> At the moment of writing the following Member States have sent derogation letters: AT, BE, CY, CZ, DK, ES, FR, GR, LU, LT, MT, PT, RO and SE.

<sup>25</sup> 21<sup>st</sup> of February, Ref. Ares (2022) 1297882.

Some Member States (BG, IT, LV) planned this project as a priority and have already upgraded their national import system in line with the UCC and the Annex B that was in force at that moment. They have implemented the NIS project within the legal deadline of 31/12/2022. However, due to this early deployment, these Member States will need to make an additional effort for a second upgrade in view of the revised Annex B by December 2023.

Most Member States have indicated that the system development is following the new data requirements in Annex B of the Commission Delegated Regulation (EU) 2015/2446 as amended by Delegated Regulation (EU) 2021/234,

Other Member States have decided to concentrate first on other projects and wait for further progress on the specifications for the trans-European system related to import, being the Centralised Clearance at Import (CCI). In particular, those Member States that decided not to upgrade their existing national declaration system, but to build a completely new one.

If not already done, updates to align their systems with the latest Annex B provisions will happen between 2021 and 2023.

Furthermore, quite some Member States progressed well, with technical specifications either completed or in progress<sup>26</sup> for almost 75% of the MSs. Member States that are currently developing the system have reported using an agile development approach in order to reduce the implementation timeframe and to minimise the impact on milestones. This can be linked to the fact that a representative majority has indicated a high level of complexity associated with the many interdependencies with other systems at national level.

The Member States that reported to envisage NIS implementation by end 2022 are: BG, DE, EE, FI, HR, IE, IT, LV, SI and SK (see table 16 below and adjusted to the latest developments).

**Important remark:**

Further to the planning and progress data collected from Member States and Commission services during Q1 and Q2 2022, new information has been communicated to the Commission which has not been represented in this accompanying staff working as it was not part of the methodological approach established for this document. The key information will be taken on board and reflected in the main Report itself.

Several Member States have submitted a written notification asking for derogation under Article 6(4) UCC to DG TAXUD considering the delay for NIS beyond the deadline 31/12/2022. The derogation requests from the Member States were assessed by DG TAXUD in terms of the justifications provided by the specific situation of the Member States requesting it and in view of a set of common assessment criteria.

In this light the Commission has proposed an Implementing Decision<sup>27</sup> granting a derogation to Austria, Belgium, Cyprus, Czechia, Denmark, France, Greece, Hungary, Lithuania, Luxembourg, Malta, Netherlands, Portugal, Romania, Spain and Sweden for the National Import System to use means other than electronic data-processing techniques for the exchange and storage of information. The derogation is proposed to apply from 1 January 2023 until the deployment of the NIS system, but not later than 31 December 2023, whichever date is sooner.

**Detailed Responses:**

Table 16 provides the individual Member States’ responses to the survey:

MS	Complexity Rating	Risk Level	Additional Comments
AT			Same response as for TS.

<sup>26</sup> The majority of MSs have completed Technical Specifications activities while AT, DK, GR, LT, PL, HU, IE, FR and PL reported to be in progress.

<sup>27</sup> This reflects the state of play at the moment of the finalisation of the Report on 11 November 2022

MS	Complexity Rating	Risk Level	Additional Comments
BE			
BG	5	Low	BG is planning an update of the National Import System in accordance to the new requirements set out by Annex B. The IT projects are implemented using the TOGAF/ADM and RUP methodologies. According to internal plans, a test version of the updated import system is expected middle of 2023, with a completed implementation by 31/10/2023.
CY	6	Med	Same response as for TS. In addition CY explained that all milestones are going to be impacted due to delay in the public procurement procedure and given that the contract with the awarded economic operator was recently signed. Mitigating measures such as the allocation of extra human and other resources, are planned.
CZ	6	Med	Same response as for TS.
DE	4	Low	According to DE, this project is implemented in the major release of the national IT-ATLAS (Release 9.1) to ensure that all data requirements from Annex B are covered, especially to provide the information required by Surveillance 3. The Economic Operator is allowed to carry out migration from 01/05/2021 until 14/10/2022. The datamodel is not in line with the new EUCDM version (FMS) and will be updated following the approach of CCI and the National Import System being the basis for the new and modernized import application. The electronic message conforms to the data requirements of the new Annex B as set out in the Delegated Act, however, for the moment, not with the formats and codes in the Implementing Act.
DK			Due to the need to prioritise the implementation of the most critical systems (ICS2, AES and NCTS), DK will not be able to go live with NIS on 31 December 2022. A new date of 31/12/2024 has been selected, however DK is intensifying the focus on contract management in order to avoid further delays.
EE	6	Low	The new national import system was implemented by Estonian Tax and Customs Board and is operational since 01/07/2021.
ES	5	Med	According to ES planning, Conformance Testing for operators will be open from July 2022, having the first deployment focused on declarations to support CCI, therefore creating a dependency with the system, the planning being adjusted in order to fit CCI system's needs. The phased approach to the upgrade of the National Import System was also confirmed with the first deployment on 30/09/2022. Listed here for information: 03/10/2022: Additional Declaration Type A & D, (with CCI Phase 1) 01/06/2023: Additional Declaration Type A, D, Z & U (national domain) 01/03/2024: Additional Declaration Type V (with I2), (national domain) 01/06/2024: Additional Declaration Type B, E, C, F, X, Y (national domain) ES advised that the initial implementation will be for CCI Phase 1. The full functionality will be gradually rolled out, but they will need to keep the old system running in parallel until all functionality is switched over. This will have implications for the SURV dataset that they will further submit.

MS	Complexity Rating	Risk Level	Additional Comments
FI	6	High	<p>FI explained that the system was upgraded in phases from early 2020 with traders using it since April 2021. The last phase covering simplifications and special procedures enters operation in Q3 this year. It was also mentioned that for the low value consignments, they had developed a mobile solution for use by private individuals which had proven very successful.</p> <p>At the same time, the SURV schema needs to be updated, foreseen in the relevant deadline. FI mentioned the huge impact that the work on the low value consignments had on their development plans and the huge increase in the volume of declarations. Upgrading the current system and integrating the necessary changes into future systems was a great effort. However, FI reassured that there are no risks identified for the national systems. Current activities are focused on the system testing phase.</p>
FR	6	Med	<p>In order to prevent Economic Operators transition problems between the applications, FR chose to stagger the transition period. Thus, it was decided to deploy a first partial version of the application in October to allow the EOs to test the application before the release of the final version expected in December. The project is made of five iterations. The 1<sup>st</sup> iteration was completed on time, with NIS expected to be deployed in production by the end of December 2022. Overall, the schedule is compressed, having unexpected events as one of the primary causes for delays on the planning.</p>
GR	6	High	<p>According to GR, new fields will be added in the current system, in order to be compliant with the UCC requirements, expecting a full implementation alongside CCI Phase 1.</p> <p>GR indicated delays to the start call for tender procedures, with internal discussions under way to assess the situation and the already confirmed impact on all milestones. Subsequent information indicates a delay until the end of 2024.</p>
HR	6	Low	<p>HR explained that the project is national and testing will be conducted with EOs. All messages and business processes are defined and the functionalities that have been defined are being developed.</p> <p>The elevated risk of complexity is due to many interdependencies among systems.</p>
HU	6	Med	<p>At the time of writing, specifications are currently being defined for NIS with the necessary adjustments to the existing import system to be ready with the UCC requirements by 31/12/2022. The necessary IT needs have been completed by the customs profession and Legal and IT barriers have been identified, having the necessary measures in place to overcome them. In parallel, development work is underway.</p> <p>In a second phase they plan some further internal development for February 2023 and in a third phase to introduce national centralised clearance in March 2023.</p>

MS	Complexity Rating	Risk Level	Additional Comments
IE	4	Med	<p>The National Import System it was confirmed had been implemented in November 2020 with the dataset applicable before the change to the new Annex B dataset. IE will update to the new dataset along with the update for CCI, being currently on track, however pressure exists with many parallel developments under way. They are also working closely with the IT solution providers for the traders to ensure they can meet all the new requirements. Those providers are also under a lot of pressure as there are a small number of companies. The IE administration has a good working relationship with the trade community and meets with them regularly.</p> <p>A possible risk on the on-time delivery of the project could be related to the existing pressure on all parties as EOs will be moving to AES and NCTS P5 during a similar timeframe.</p>
IT	6	Low	<p>For National Import IT already has a system in place which was updated by 01/07/2021 with a migration period for traders until 08/06/2022. This is based on EUCDM 5.2 and covers standard declarations only, simplified and EIDR will come later in 2022. This will also need to be updated to the latest Annex B requirements, being planned for November 2023 along with CCI. The H7 dataset for low value consignments is already based on the new requirements and traders are well informed about the changes. The old import system will be closed for new declarations starting 08/06/2022.</p>
LT	6	High	<p>A delay of 12 months is envisaged.</p>
LU			<p>LU indicated a delay less than 6 months regarding the implementation of NIS in accordance with the previous Annex B, therefore the new Upgrade was not provided with a planning.</p>
LV	6	Low	<p>LV explained that as from 03/06/2018 National Import System has been aligned with Annex B and EUCDM V2.0. In order to implement updates according to the EUCDM latest version and CCI until 01/12/2023, a totally new National Import System should be developed. This could cause delays on the deployment of the system given several external issues such as COVID-19 pandemic and Ukraine war, which have impacted the costs of getting a new contract in place.</p>
MT	6	High	<p>MT indicated that NIS will be deployed with full functionality, being aligned with EUCDM V6.1 and that Conformance Testing will not be applicable for the deployment of National systems.</p> <p>Given the numerous activities concerning various systems that are happening all in the same period, MT expressed that a high level of risk on the on-time delivery of the project is imminent, with an anticipated delay on Deployment into production of 1 Quarter. Technical Specifications will be impacted, therefore, the upgraded National Import System will be deployed around Q1/Q2 2023, instead of Q4 2022.</p>
NL	3	Low	<p>NL indicated that an agile approach is being used for the system development. The overall status for the system deployment is appreciated as being on target. NL will provide a transition period for their traders until June 2023 as all traders will not be ready in time for the end of 2022. NL will also meet the SURV3 requirements using a converter from 01/01/2023.</p>

MS	Complexity Rating	Risk Level	Additional Comments
PL	6	Low	<p>PL emphasized that for NIS, functionalities will be implemented for production requiring data exchange with EU countries and at the same time, data to be supplied to the European Commission.</p> <p>NIS deployment is envisaged for 31/12/2022. PL has an external contractor working on the development and no major risks have been identified yet. The system will be UCC compliant, the new Annex B data requirements have been already implemented, but not made operational yet. The attributes from the original Annex B have been already implemented in the current national specification for some time, but they were blocked. National system for special procedures called RPS (for economic operators for the settlement of special procedures) has already been implemented.</p> <p>In the system development, PL will use both an agile and an iterative approach.</p>
PT	6	High	<p>PT indicated that regarding the Conformance Testing activities, national domain tests and tests with Central Systems will be performed.</p> <p>According to PT, a partial deployment approach cannot be envisaged for the system, given the high probability of causing the disruption of the National Import System.</p> <p>A delay of 9 to 12 months is being envisaged for NIS.</p>
RO	6	Med	Same response as for TS.
SE	3	Low	<p>SE reiterated their intention of performing a phased implementation. The information provided by SE regarding NIS is applicable regarding standard customs declaration. The simplified declaration and EIDR will be implemented 2023/2024. The low value declaration H7 will be deployed during summer 2023. SE advised that for the standard customs declaration (excl. Special Procedures), they already deployed this on 15/03/2022. There is a migration period for traders until 31/12/2022. The Special Procedures and H5 dataset will be implemented in February 2023 with migration until 30/06/2023. The H7 is in 2 development phase and will be deployed in summer 2023. For simplified declaration/EIDR, development and deployed are envisaged for 2023/2024, with migration until Q4 2024. Customs warehousing was already updated, but needs to be updated again to the new Annex B requirements and this is envisaged for 2024.</p>
SI	6	Low	<p>SI explained that an increased complexity level was allotted to the system development considering the had to harmonise the data of the import declaration with the new Annex B requirements. Given the considerable change of data it was necessary to reprogram about 1000 national rules and conditions and about 2000 risk analysis instructions. At the same time, a great impact was generated considering the data changes from EUCDM V3.1 to EUCDM V6.1. This has caused to postpone the use of the renewed import system, having the external environment not prepared and very difficult to work with. On the same note communication was highly affected due to the situation created by the COVID 19 pandemic, adding to the system development complexity.</p>
SK	3	Low	<p>Regarding AN/PN/TS and NIS, SK confirmed that they will be a year late with the deployment due to lack of human resources. They are currently performing analysis of the situation with their IT supplier and crisis manager. For the moment no mitigating measures are foreseen.</p> <p>In addition, SK indicated that the system will be in accordance with the new Annex B Delegated Regulation (EU) 2015/2446 requirements starting 01/12/2023.</p>

Table 16: Detailed responses from Member States – National Import Systems Upgrade



Figure 7 provides the percentage of Member States in each development phase.

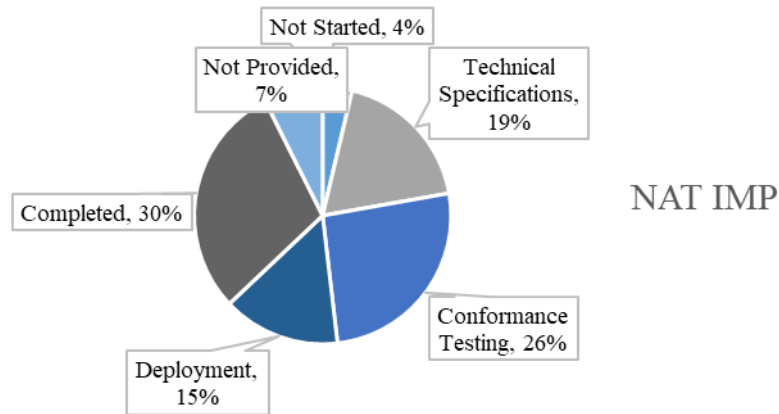


Figure 7: Summary of Survey Responses – National Import Systems Upgrade

### 3.1.4 Overview of Project Progress

Table 17 highlights any divergences in the planning compared to the dates set in the Work Programme. As this project has a deployment window, the ‘Deployment’ and ‘Operations’ columns are shown. If there is a difference in these two dates, this implies that a migration period is planned.

On the delivery of the Technical Specifications, most Member States reported the work done. However, the Member States and the economic operators need at least an additional 12 months from that moment till the full operation of their upgraded NIS and the interconnection with trade.

In regards to the implementation of the *National Import Systems Upgrade*, the following Member States have a planned operations date that is later than the deadline in the UCC Work Programme: BE, CZ, CY, ES, FR, GR, LT, NL, PL, PT and RO. AT and DK did not provide data. The specific dates can be found in Table 17 below. MT explained that the provided date for operation is the “happy flow” date, however the months of October/November/December are very busy for trade prior to Christmas so this brings with it some risks for delays. Due to latest developments, some more Member States have reported to have a full deployment and transition beyond the legal deadline such as HU, LU, MT, SE.



Respondee	Technical Specifications			Conformance Testing		Deployment (Start of the deployment window)			Operations (End of the deployment window)	
	Target date from WP	2022 Planned/ Actual End Date	2022 % of Completion	2022 Planned/ Actual End Date	2022 % of Completion	Target date from WP	2022 Planned/ Actual Date	2022 % of Completion	Target date from WP	2022 Planned/ Actual Date
AT		Not provided	80%	Not provided	0%		Not provided	0%		Not provided
BE		01/11/2021	Not provided	01/09/2023	Not provided		01/10/2023	Not provided		01/10/2023
BG		28/02/2018	100%	01/12/2018	100%		07/01/2019	Not provided		07/01/2019
CY		30/07/2022	100%	21/03/2023	0%		31/03/2023	0%		31/03/2023
CZ		31/03/2023	100%	30/11/2023	100%		01/12/2023	100%		01/12/2023
DE		09/10/2020	100%	14/10/2022	50%		06/03/2021	100%		31/10/2022
DK		Not provided	25%	Not Provided	0%		Not provided	0%		Not provided
EE		30/09/2020	100%	30/06/2021	100%		01/07/2021	Not provided		01/07/2021
ES		14/03/2022	100%	30/06/2024	50%		30/09/2022	100%		30/06/2024
FI		30/06/2019	100%	Not provided	100%		31/12/2019	100%		31/12/2022
FR		01/02/2022	100%	N/A	100%		30/09/2022	100%		31/03/2023
GR		31/03/2021	70%	N/A	N/A		31/12/2022	0%		01/01/2025
HR		31/12/2021	100%	31/12/2022	100%		01/01/2023	100%		01/01/2023
HU		31/07/2022	100%	31/12/2022	100%		31/12/2022	100%	31/12/2022	31/12/2022
IE		04/10/2019	100%	04/10/2021	0%		23/11/2020	0%		05/10/2021
IT		02/12/2019	100%	30/06/2021	Not Provided		01/07/2021	Not provided		30/06/2021
LT		04/05/2023	80%	01/12/2023	0%		01/12/2023	0%		01/12/2023
LU		22/02/2022	Not provided	20/12/2022	Not provided		10/01/2023	Not provided		10/01/2023
LV		30/10/2017	100%	01/06/2018	Not Provided		03/06/2018	Not Provided		04/06/2018
MT		31/03/2022	100%	N/A	N/A		15/11/2022	75%		15/11/2022
NL		22/06/2021	100%	31/12/2022	100%		01/04/2022	100%		30/06/2023
PL		01/01/2023	90%	30/09/2023	Not provided		01/12/2023	50%		01/12/2023
PT		01/07/2022	100%	31/07/2023	40%		30/11/2023	Not provided		01/12/2023
RO		31/03/2022	0%	31/12/2022	0%		31/12/2022	0%		30/06/2023
SE		15/09/2021	100%	31/12/2022	100%		15/03/2022	100%		31/12/2022
SI		01/07/2019	100%	01/10/2021	100%		01/01/2022	Not provided		01/01/2022
SK		06/06/2016	100%	01/11/2023	Not Provided		30/06/2019	100%		Not provided

Table 17: Comparison of Planned and Actual Dates – National Import Systems Upgrade<sup>28</sup>

<sup>28</sup> Several dates provided may differ given the derogation process undergoing.

Additional details regarding the specific percentage of completion per milestone can be seen in Figure 8.

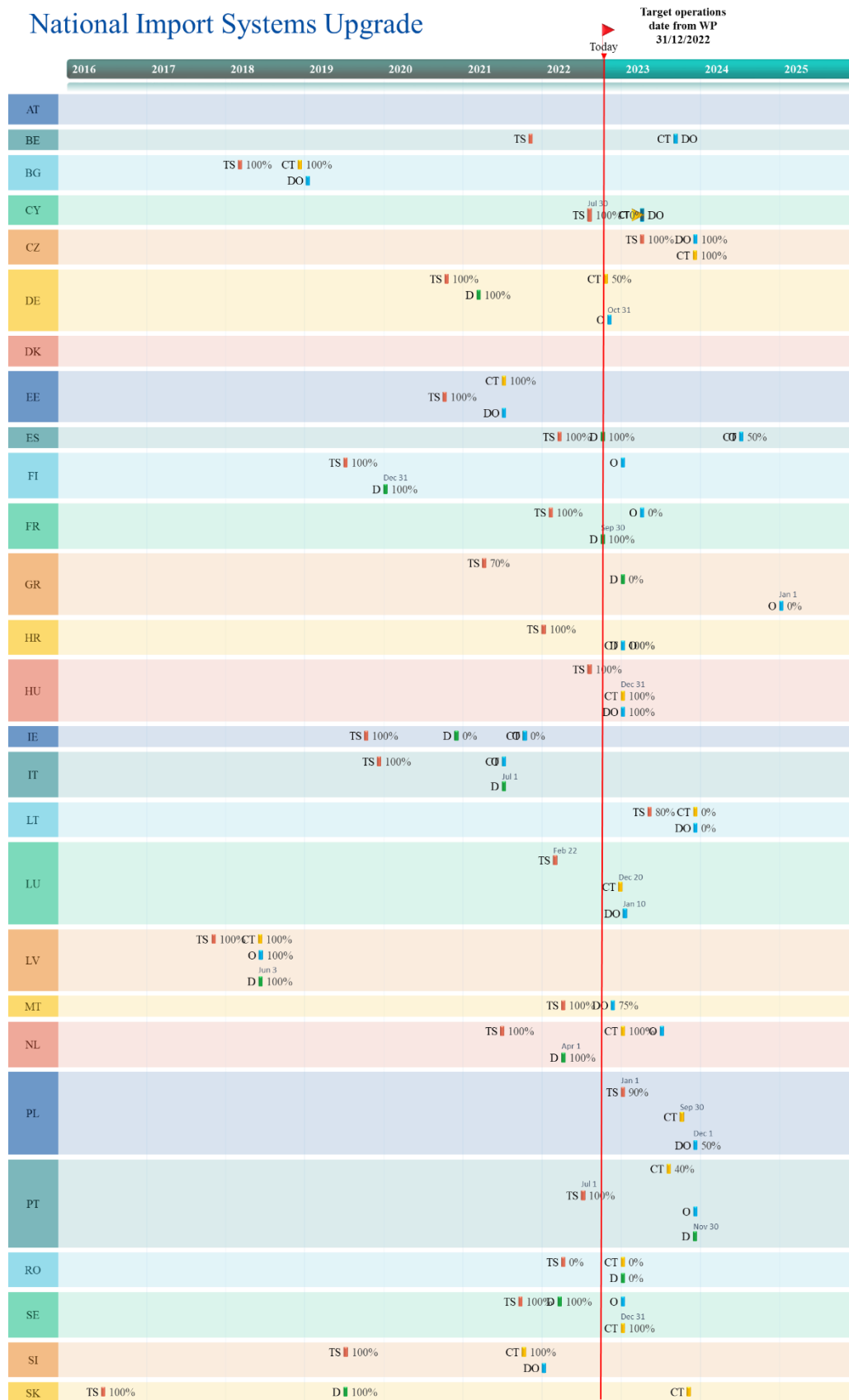


Figure 8: Percentage of Completion per Phase – National Import Systems Upgrade

### 3.3 UCC SPECIAL PROCEDURES – COMPONENT 2 (SP IMP)

This national project aims to accelerate, facilitate and harmonise Special Procedures (SP) across the Union by means of providing common business process models. The national systems will implement all UCC changes required for all the special procedures (customs warehousing, end-use, temporary admission and inward/outward processing). It should be noted that, in many Member States, the implementation of this project occurs within the context of the upgrades of the national import and export systems.

In terms of planning, this project will be implemented in two parts. The first component is the national “Special Procedures EXP” (SP EXP) with the view to providing the required national electronic solutions for the export-related special procedure activities. The second component is the national “Special Procedures IMP” (SP IMP) with the view to providing the required national electronic solutions for the import-related special procedures activities.

The implementation of these projects will occur through the projects UCC Automated Export System (AES) and UCC National Import Systems upgrade.<sup>29</sup> Therefore the information provided for under these projects also applies in this context.

#### 3.1.5 Summary of Responses

##### Summary from the Member States:

The majority of the Member States have assessed the complexity as being medium or high, mentioning as the primary cause the many interdependences with the systems at national level.

The potential causes for delay evoked are the following: the implementation of a new import system and/or dependencies with other systems, the alignment with the new Annex B requirements, lack of resources and procurement delays along with specific working circumstances caused by the COVID-19 pandemic. Many Member States have also informed that an Agile development methodology was adopted in order to reduce the implementation timeframe.

According to the analysed data the following Member States are envisaging completion of the project by the end of 2022: BG, CY, DE, EE, FI, FR, GR, HR, HU, IE, IT, LV, MT, PL and SI. However, due latest developments on the side of the NIS implementation, some of these Member States might not have met this envisaged milestone.

##### Detailed Responses:

Table 18 provides the individual Member States’ responses to the survey:

MS	Complexity Rating	Risk Level	Additional Comments
AT			Same response as for NIS.
BE			
BG	5	Low	BG is planning an update of the National Import System (NSP IMP system being a part of it) in accordance to the new Annex B requirements. The IT projects are being implemented using the TOGAF/ADM and RUP methodologies. According to internal planning, a test version of the updated import system is expected middle of 2023, with an implementation date set for 01/10/2023.
CY	6	Med	Same response as for NIS.
CZ	6	Med	Same response as for NIS.

<sup>29</sup> UCC Special Procedures – Component 2 (NSP IMP) is following the planning for UCC National Import Systems upgrade, therefore it is foreseen to be operational by the end of 2022.

MS	Complexity Rating	Risk Level	Additional Comments
DE	4	Low	DE explained that this component is implemented in the major release of the national IT-System ATLAS (Release 9.1) being part of the National Import Systems upgrade. The Economic Operator is allowed to carry out migration from 01/05/2021 until 14/10/2022.
DK			
EE	6	Low	The system is in operation since 01/07/2021.
ES	4	Low	ES indicated that a risk of delay exists due to system coordination with National Import Systems upgrade. An agile approach is being used in order reduce impact on the implementation timeframe.
FI	6	High	Same response as for NIS.
FR	5	Med	Concerning FR, the functionalities will be delivered in iterations. The Special Procedures (SP IMP) project is backed by the NIS application, therefore it was decided that a first iteration to be delivered to ensure non-regression for operators and another batch for the rest of the functionalities. A medium risk level was associated with the system's on-time delivery, having indicated Technical Specifications and Conformance Testing as the most impacted milestones. It was decided by FR to shift the planning, opening the pilot phase in December 2022, deploying the complete application at the end of March 2023 and ending the transitional period in June 2023. This delay was necessary considering the evolving nature of Annex A (application for authorization on declaration) for example.
GR			
HR	6	Low	HR stated that Special Procedures Component 2 (SP IMP) is a national project, being developed together with the import customs declaration, following testing to be conducted with EOs. Delays are envisaged due to many interdependences among systems. Messages and business processes are defined and the already established functionalities are being developed. All other functionalities will be developed by the end of the year.
HU	3	Low	According to HU the necessary IT needs have been completed by customs. Legal and IT barriers have been identified and the necessary measures have been put in place to overcome them. In parallel, development work is underway.
IE	4	Med	IE explains that considering EOs will be moving to AES and NCTS P5 during a similar timeframe there will be pressure on all parties.
IT	6	Low	None.
LT	6	High	A delay of 12 month is possible due to complex and lengthy service procurement procedures. As mitigating measures LT mentioned that they are carrying open discussions with the contractor in order to assess the situation. The most affected will be Conformance Testing (date being pushed to 01/07/2023) and Deployment (with new planned end date set for 01/12/2023).
LU			
LV	6	Low	LV stated that as from 03/06/2018 the National Import system has been aligned with UCC DI/IA Annex B and EUCDM V2.0. An elevated risk for delays is anticipated considering that in order to implement updates according to the EUCDM latest version and CCI until 01/12/2023, a brand new national import system should be developed.
MT	4	Low	According to MT the system will be deployed with full functionality, being integrated with the Central System. The upgraded National Import System will be deployed around Q1/Q2 2023 instead of Q4 2022.

MS	Complexity Rating	Risk Level	Additional Comments
NL	3	Low	An agile development approach is being used in the system development.
PL	5	Med	<p>The implementation of the UCC Special Procedures system (Components 1 and 2) is carried out in stages. The System has been made available only to Customs Officers from 01/07/2021 (in terms of monitoring the use of SP by Economic Operators). Then, the System was made available voluntarily for interested EOs from 29/11/2021 (in terms of submitting the Bill of Discharge and Inventory). The RPS system has been implemented for all currently available business functions and is mandatory for EOs starting 28/03/2022. Moreover, relevant business functions concerning the special procedures were implemented into national IMP and EXP systems.</p> <p>The identified risk for delay is due to the creation of a new IT national system RPS, with new functionalities and the integration with other IT national customs. PL expressed that this new system was needed in order to achieve the complex business goal. SP depends on system RPS for managing and settlement and is integrated with other IT national customs systems, which are currently being expanded. The complexity is particularly due to the integration with national IMP and EXP systems in the field of online transfer of data from customs declarations regarding SP to RPS system.</p> <p>Additionally development based on the data requirements in Annex B of the Commission Delegated Regulation (EU) 2015/2446 as amended by Delegated Regulation (EU) 2021/234 is in progress.</p>
PT	6	High	<p>The project is delayed due to implementation of a completely new National Import System, with Conformance Testing and Deployment being the most impacted milestones.</p> <p>Still PT indicated that the situation will be managed by providing Technical Specifications, support, assistance and close training to all Traders as soon as possible.</p> <p>According to PT no partial deployment approach is envisaged given that it would cause the disruption of the National Import System.</p> <p>An agile development approach will be used to reduce implementation timeframe.</p> <p>The major changes that were brought to the 2021 national planning concern conformance testing activities. The tests of integration with the other national systems only can be done after those systems are ready to connect with the National Import System. The impact of the delay in the other systems is reflected in a delay in NIS. Consequently, the tests with traders have to be extended to allow the Economic Operators to be ready to implement their systems accordingly.</p> <p>Relating to deployment into production, as the actual NIS is an integrated system, since the beginning of the project it was decided that no partial deployment would be possible in order to avoid any kind of disruption that could cause impact on clearance with potential financial costs for Traders and for customs administration.</p> <p>This project is an integrated part of the project UCC National Import Systems Upgrade.</p> <p>A delay of 9 to 12 months is being envisaged for SP Component 2.</p>
RO	6	Med	Same response as for NIS.
SE	3	Low	<p>SE reported delays compared to the deadlines indicated in the UCC. The indicated operational date for SP IMP is 30/06/2023.</p> <p>Regarding Customs Warehousing the system is developed, but must be upgraded to the new Annex B. Preliminary operational stage is planned for 2024.</p> <p>For more detailed information please see as well the dedicated section for NIS.</p>

MS	Complexity Rating	Risk Level	Additional Comments
SI	6	High	Special Procedures are part of the Slovenian upgraded import declaration system (SIAIS2), which has been in use since 01/01/2022. SI expressed that a high risk of delay was inevitable due to the need to harmonize the import declaration data with Annex B IA / DA (H2, H3, H4).
SK	4	High	SK explained that a high risk for delays is identified due to the required alignment with Annex B. Considering the lack of financial and human resources these requirements are not reflected at the time being.

Table 18: Detailed responses from Member States – NSP IMP

Figure 9 provides the percentage of Member States in each development phase.

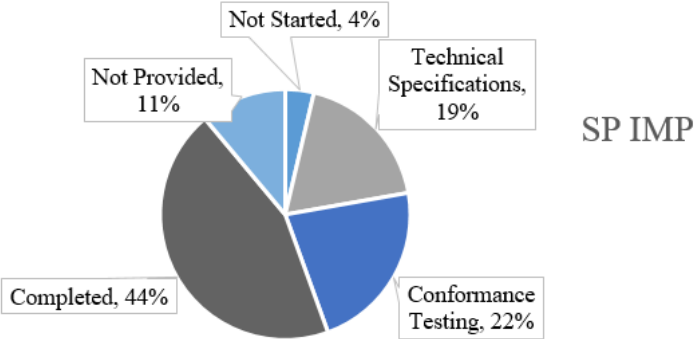


Figure 9: Project Status as per Survey – SP IMP

### 3.1.6 Overview of Project Progress

Table 19 highlights any known divergences in the planning of the **SP IMP** compared to the dates set in the Work Programme. As this project has a deployment window, the ‘Deployment’ and ‘Operations’ columns are shown. If there is a difference in these two dates, this implies that a migration period is planned.

Respondee	Technical Specifications			Conformance Testing		Deployment (Start of the deployment window)			Operations (End of the deployment window)	
	Target date from WP	2022 Planned/ Actual End Date	2022 % of Completion	2022 Planned/ Actual End Date	2022 % of Completion	Target date from WP	2022 Planned/ Actual Date	2022 % of Completion	Target date from WP	2022 Planned/ Actual Date
AT		Not Provided	80%	Not Provided	0%		Not Provided	0%		Not Provided
BE		01/11/2021	Not Provided	01/10/2023	Not Provided		01/10/2023	Not Provided		01/10/2023
BG		28/02/2018	100%	01/12/2018	100%		07/01/2019	100%		07/01/2019
CY		30/12/2020	100%	01/06/2022	0%		03/06/2022	0%		03/10/2022
CZ		31/03/2023	100%	30/11/2023	100%		01/12/2023	100%		01/12/2023
DE		09/10/2020	Not Provided	14/10/2022	50%		06/03/2021	100%		31/10/2022
DK		01/06/2021	25%	Not Provided	0%		Not Provided	0%		Not provided
EE		30/09/2020	100%	30/06/2021	100%		01/07/2021	100%		01/07/2021
ES		01/04/2022	90%	30/06/2024	0%		30/09/2022	95%		30/06/2024
FI		30/06/2019	Not Provided	Not Provided	Not Provided		31/12/2022	100%		31/12/2022
FR		30/06/2022	80%	N/A	75%		30/09/2022	80%		12/2022
GR		30/06/2021	Not Provided	Not Provided	Not Provided		31/12/2022	Not Provided		31/12/2022
HR		31/12/2021	Not Provided	31/12/2022	100%		01/01/2023	100%	31/12/2022	01/01/2023
HU		31/07/2022	100%	31/12/2022	100%		31/12/2022	100%	31/12/2022	31/12/2022
IE		04/10/2019	100%	04/10/2021	0%		23/11/2020	0%		05/10/2021
IT		02/12/2019	100%	30/06/2021	100%		01/07/2021	100%		30/06/2021
LT		04/05/2023	80%	01/12/2023	0%		01/12/2023	0%		01/12/2023
LU		22/02/2022	Not Provided	20/12/2022	Not Provided		10/01/2023	Not Provided		10/01/2023
LV		30/10/2017	100%	01/06/2018	100%		03/06/2018	100%		04/06/2018
MT		31/03/2022	100%	Not Provided	50%		15/11/2022	50%		15/11/2022
NL		22/06/2021	100%	31/12/2022	100%		01/04/2022	100%		30/06/2023
PL		16/01/2020	Not Provided	04/05/2021	100%		01/07/2021	100%		28/03/2022
PT		31/07/2022	100%	31/07/2023	40%		30/11/2023	0%		01/12/2023
RO		31/03/2022	0%	31/12/2022	0%		31/12/2022	0%		30/06/2023
SE		01/06/2022	100%	30/06/2023	0%		28/02/2023	0%		30/06/2023
SI		01/07/2019	100%	01/10/2021	100%		01/01/2022	100%		01/01/2022
SK		01/12/2022	100%	01/11/2023	100%		01/12/2023	100%		Not Provided

Table 19: Comparison of Planned and Actual Dates – NSP IMP

Regarding **SP IMP**, additional details regarding the specific percentage of completion per milestone can be seen in the figure below.

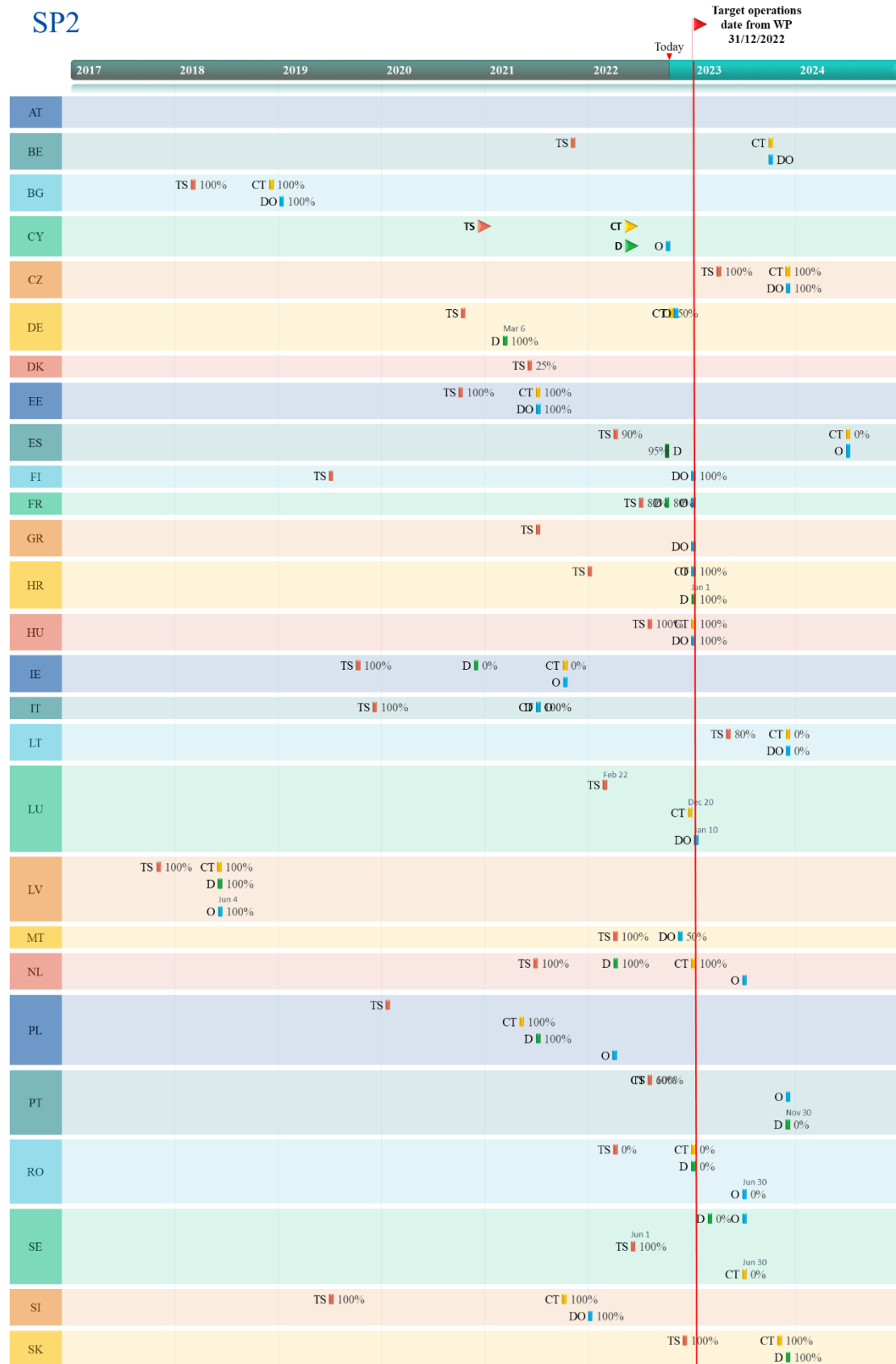


Figure 10: Percentage of Completion per Phase – NSP IMP



## 4. ONGOING PROJECTS: DETAILED PLANNING AND PROGRESS INFORMATION

### 4.1 UCC SPECIAL PROCEDURES – COMPONENT 1 (SP EXP)

#### 4.1.1 Summary of Responses

##### Summary from the Member States:

Member States have indicated predominantly a low, respectively medium risk level on the on-time delivery of the project, while assessing the complexity as being medium.

The potential causes for delays identified are the following: dependencies with other systems, especially AES, lack of resources and procurement delays along with specific working circumstances caused by the COVID-19 pandemic, complex and lengthy service procurement procedures. Many Member States have also implemented Agile development methodologies to reduce the implementation timeframe.

All Member States that have provided updated information have indicated that the system development is following the new data requirements in Annex B of the Commission Delegated Regulation (EU) 2015/2446 as amended by Delegated Regulation (EU) 2021/234.

According to the data analysed the following Member States have marked the project as complete: DE, ES, HR, HU, NL and PL.

SE has reported progress on their technical specifications reached only 25% and the planned date of operations has shifted to end 2024. LV indicated that technical specifications are not applicable for them considering that AES will not have External Domain Application Programming Interface (API).

In terms of assessing the level of completeness of the system, approximately three quarters of the Member States that have provided updated information reported that the system is on target. FI indicated that currently the development of the system is being delayed beyond the Deployment deadline, while CZ, GR, LT and SK mentioned that the overall Deployment is still planned to meet the deadline.

##### Detailed Responses:

Table 20 provides the individual Member States' responses to the survey:

MS	Complexity Rating	Risk Level	Additional Comments
AT			
BE			
BG	4	Low	At the moment the Elaboration Phase is underway. By the end of 2022 it is expected a full completion of the Elaboration and the Construction Phase.
CY	6	Low	According to CY, the analysis, the preparation of specifications, the implementation and a part of the conformance testing of the system will take place in 2022. The public procurement process has been concluded and the contract has been signed with the contractor. The project initiation document has been agreed and the relevant project plans and timelines for all the UCC systems have been updated and agreed.
CZ	6	Med	The Czech Republic will use the "big bang" method for the SP EXP. According to the National Project Plan of CZ a test environment will be ready in July 2022. Since that date CZ will be able to start testing of commercial software and Conformance Testing will begin (Mode 1 being scheduled June-September 2022 and Mode 2, October 2022 - February 2023). A partial deployment approach with limited functionality is not envisaged, operations will start in AES on 03/04/2023 and the transitional period for traders will not be used. Issues on the developer's side have been identified, however it is assumed that the delay will not have a major impact and that the development will be

MS	Complexity Rating	Risk Level	Additional Comments
			completed at the end of September 2022. If the development will be delayed, there is a risk that the internal methodology will not be prepared in time. In this light, CZ has meetings with the contractor on a weekly basis, where they evaluate progress in development.
DE	4	Low	<p>The UCC Special Procedures EXP is developed together with the national AES Component 1 (which corresponds to the national ATLAS Release AES 3.0.1). The acceptance test AES 3.0.1 started on 18/01/2021 and was carried out without interruption until 05/03/2021.</p> <p>DE is making use of an agile development approach in defined software release-cycles. The ongoing activities concern the finalisation and fine-tuning of AES (e.g. adaptation of Surveillance), the monitoring of operations as well as the preparation of remaining Conformance Tests for new functionalities of AES (e.g. centralised clearance) and the start of the Conformance Test (certification) of Economic Operators.</p> <p>The end-date of the transition window for trader has been shifted from end 2022 to June 2023 to allow maximum flexibility to migrate from ECS-P2 to AES.</p>
DK			
EE	5	Med	None.
ES	4	Low	None.
FI	6	High	<p>FI expressed that Special Procedures EXP is being developed together with the national AES Component 1.</p> <p>AES will be built from scratch which will cause a significant impact on the on-time delivery of the project, given its many integrations with several parallel projects. At the same time, AES will be put on hold and an updated NPP will be presented due to prioritization of NCTS. To this it can be added COVID-19 and shortage of resources especially on suppliers side.</p>
FR	5	Med	<p>FR expressed that an iterative approach will be used for the system development. One delivery (80% of SP EXP) will be made with the AES delivery (October 2023) and the other features will be delivered in a later batch with another version (during 2024).</p> <p>A medium level of risk was associated with the on-time delivery of the project, having an imminent impact on Technical Specifications and Conformance Testing.</p>
GR	6	High	One major cause of delay in deployment with impact on Conformance Testing and Deployment indicated by GR is the actual delay in call for tender procedures. GR stated that internal discussions are ongoing in order to assess the situation.
HR	3	Low	HR stated that Special Procedures EXP is being developed together with AES.
HU	3	Low	Same response as for Special Procedures – Component 2 (NSP IMP).
IE	6	Med	IE explained that the testing of AES and the Transition Handler will be complex and could present some challenges due to the new concept. Internal system testing started end of April 2022 with Conformance Testing starting 13/06/2022.
IT	3	Low	Italy stated that SP EXP is being developed together with the national AES Component 1 and that National Conformance Testing will be performed. Thus, the deployment date of this project has been updated compliant to the new deployment date of AES Component 1. Therefore, the deployment date of National SP EXP has been slipped from 20/02/2023 to 08/05/2023.
LT	4	Med	According to LT, the deployment deadline as set in the current version of their NPP is 01/09/2023. Complex and lengthy service procurement procedures will have an impact on Conformance Testing and Deployment. In this light, mitigating measures are to be assessed with the contractor.
LU			

MS	Complexity Rating	Risk Level	Additional Comments
LV	4	Med	LV expressed that SP EXP is being developed together with the national AES Component 1. Considering that AES will not have External Domain API, Technical Specifications for Trade will not be needed, therefore will not be delivered. At the same time LV expressed concern related to possible delay for Deployment. In order to mitigate this hypothesis, AES will be deployed with limited capability, therefore an iterative approach is being used for the system development.
MT	4	Low	Same response as for Special Procedures – Component 2 (NSP IMP).
NL	3	Low	At the time of writing, NL is developing and testing the system with the supplier. An agile development approach is envisaged.
PL	5	Med	Same response as for Special Procedures – Component 2 (NSP IMP).
PT	6	High	PT is developing the SP EXP system as an integrated part of the UCC Trans-European Automated Export System (AES). Considering this, a high risk will be associated with the on-time delivery of the project, due to a brand new implementation of the National AES System. PT indicated that related to further activities, Conformance Testing will be organised as Mode 1, 2 and 3 and that an agile development approach will be used to reduce implementation timeframe.
RO			
SE	4	Low	SE indicated that the operational date will be Q4/2024.
SI	4	Low	The first version of SIAES2 (Slovenian Automated Export System - 2nd generation) was successfully installed in the test environment on February 23 <sup>rd</sup> , 2022. Technical documentation is finalised and the development of the new export application is under completion stage. SI has performed National Domain Testing, Mode 0 and Mode 1, both finalised on 03/05/2022, with the deadline for launching AES-P1 maintained for 01/05/2023.
SK	3	High	According to SK activities schedule procurement on technical analysis is completed, having Conformance Testing planned for Q2/2023. At the time of writing, the project is delayed due to lack of financial and human resources

Table 20: Detailed responses from Member States – SP EXP

Figure 11 provides the percentage of Member States in each development phase.

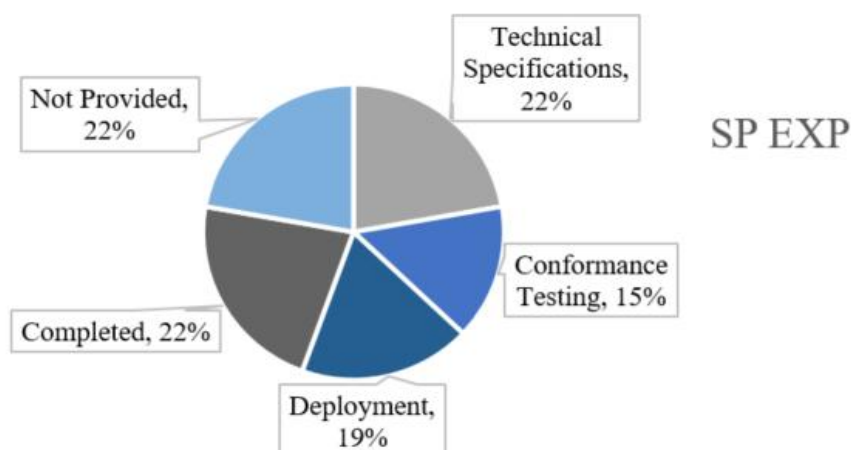


Figure 11: Project Status as per Survey – NSP EXP

#### 4.1.2 Overview of Project Progress

Table 21 highlights any known divergences in the planning of the **SP EXP** compared to the dates set in the Work Programme. This project has a deployment window from 01/03/2021 till 01/12/2023. The ‘Deployment’ and ‘Operations’ columns are shown as well. If there is a difference in the dates of these columns, this implies that a migration period is planned.

Respondee	Technical Specifications			Conformance Testing		Deployment (Start of the deployment window)			Operations (End of the deployment window)	
	Target date from WP	2022 Planned/ Actual End Date	2022 % of Completion	2022 Planned/ Actual End Date	2022 % of Completion	Target date from WP	2022 Planned/ Actual Date	2022 % of Completion	Target date from WP	2022 Planned/ Actual Date
AT		Not Provided	Not Provided	Not Provided	Not Provided		Not Provided	Not Provided		Not Provided
BE		01/09/2021	Not Provided	01/09/2023	Not Provided		01/09/2023	Not Provided		01/09/2023
BG		14/11/2022	100%	18/08/2023	0%		30/08/2023	0%		30/08/2023
CY		10/01/2022	Not Provided	01/02/2023	Not Provided		02/02/2023	Not Provided		03/04/2023
CZ		31/12/2021	Not Provided	02/04/2023	80%		03/04/2023	80%		03/04/2023
DE		23/10/2020	100%	05/03/2021	100%		06/03/2021	100%		16/06/2023
DK		01/08/2022	Not Provided	30/08/2023	Not Provided		01/05/2023	Not Provided		30/08/2023
EE		31/03/2022	80%	01/06/2023	20%		30/06/2023	0%		30/06/2023
ES		01/05/2022	80%	01/11/2022	100%		15/12/2022	100%		15/12/2022
FI		05/11/2021	100%	31/12/2022	30%		31/03/2023	45%		30/09/2023
FR		31/12/2022	80%	30/09/2023	75%		31/12/2023	80%		01/12/2023
GR		Not Provided	50%	Not Provided	0%		31/12/2022	0%		31/12/2022
HR		31/12/2021	100%	31/12/2022	100%		01/01/2023	100%		Not Provided
HU		31/01/2023	100%	31/08/2023	100%		01/12/2023	100%		01/12/2023
IE	To be defined by MS	28/01/2022	100%	30/03/2023	100%	01/03/2021	30/01/2023	0%	01/12/2023	31/03/2023
IT		15/02/2021	100%	30/06/2022	90%		05/09/2022	0%		03/04/2023
LT		01/12/2022	95%	01/09/2023	0%		01/09/2023	0%		01/09/2023
LU		Not Provided	Not Provided	Not Provided	Not Provided		Not Provided	Not Provided		Not Provided
LV		N/A	Not Provided	30/09/2023	50%		02/10/2023	75%		02/10/2023
MT		31/01/2023	100%	31/10/2023	75%		15/11/2023	50%		15/11/2023
NL		01/01/2022	100%	31/12/2022	100%		01/04/2022	100%		31/12/2022
PL		23/10/2020	100%	04/05/2021	100%		29/11/2021	100%		28/03/2022
PT		15/09/2022	100%	01/08/2023	0%		30/11/2023	0%		30/11/2023
RO		28/02/2022	Not Provided	31/08/2023	Not Provided		15/05/2023	Not Provided		31/08/2023
SE		01/09/2022	25%	20/12/2024	0%		01/10/2024	0%		20/12/2024
SI		06/04/2021	100%	31/01/2023	90%		01/05/2023	0%		01/05/2023
SK		01/12/2022	95%	01/11/2023	0%		01/12/2023	0%		Not Provided

Table 21: Comparison of Planned and Actual Dates – NSP EXP

Additional details regarding the specific percentage of completion per milestone can be seen in the following figure.

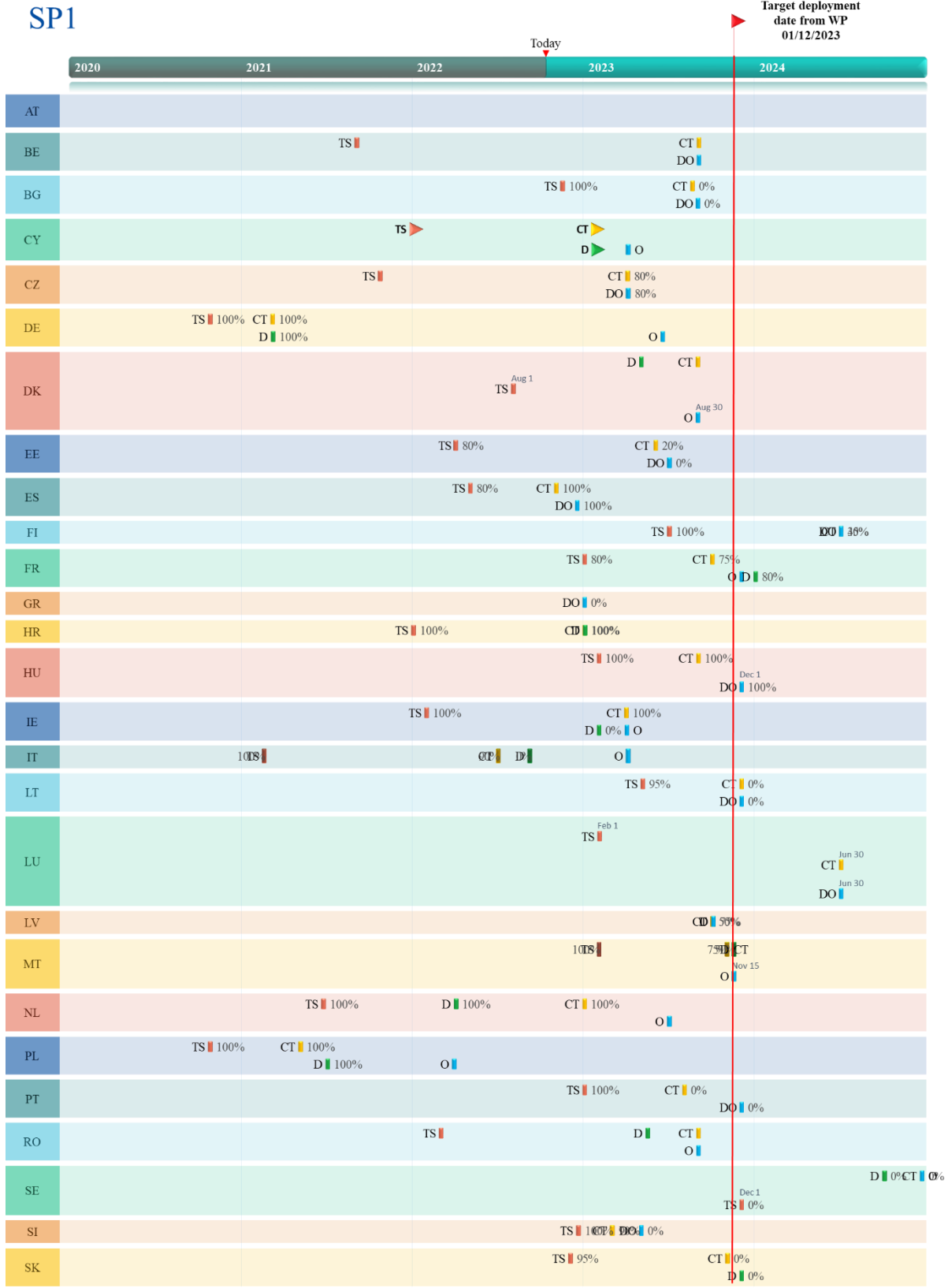


Figure 12: Percentage of Completion per Phase – SP EXP

## **4.2 UCC GUARANTEE MANAGEMENT (GUM)**

The UCC Guarantee Management (GUM) project aims to assure the effective and efficient management of the different types of guarantees. The main objective is to ensure that the data of guarantees, which are used in more than one MS, are made electronically accessible to the MS where a customs declaration is lodged and accepted when such guarantee is used. This will require new interfaces between GUM and national systems. One advantage of the solution is that the traders can provide one guarantee that can be used across the Union. Moreover, the improved processing speed, traceability and monitoring of guarantees electronically between customs offices is expected to lead to a faster identification of cases where guarantees are deemed invalid or insufficient to cover the incurred or potential debt.

The system is comprised of two components. The first component is "GUM". GUM is a trans-European system that will cover the management of the comprehensive guarantees that may be used in more than one Member State. Transit guarantees monitoring is an exception to the above and is handled as part of the NCTS project. The second component of the system is "National Guarantee Management". This will manage the upgrade for the electronic systems existing at national level to manage the guarantees valid in one Member State.

### **4.1.3 Summary of Responses**

#### ***GUM – Component 1***

##### **Summary from the Commission:**

The decentralised system with light central IT support will be implemented through the UCC Customs Decisions system. The central GUM component is expected to be operational in the second quarter of 2025, as legally required.

On the basis of the systems architectural change, the hybrid-Member States, using the UCC Customs Decisions system, should be ready and test their systems before the central GUM component goes live. Member States with hybrid solutions are expected to start operations in the first quarter of 2024. This creates a window of one year to develop their system after the component specifications of the GUM central system are made available.

The UCC GUM Application, Service and Technical Systems Specifications for the UCC Customs Decisions system, the Trader Portal & the Customs Reference Service was approved in Q3 2022.

Even though Implementation Support is not scheduled to start until Q4 2023, a GUM Business User Guide has been created and will be submitted for review to the Member States in the first half of 2023.

An initial draft of the Annex A data elements needed for GUM was finalised in the first half of 2022. Extensive review of the draft Annex A is in progress.

The Commission presented the planning as well as the new requirements under the UCC to the Member States in several meetings.

The planning will need to be carefully examined and adjusted in the coming years by the Commission and the Member States to keep this project on track. In this light, the GUM project team coordinated the collection of a list of MSs' appointed National Project Managers for the UCC GUM project, and updated the UCC Projects NPM Master list with the confirmed appointees.

#### ***National GUM – Component 2***

##### **Summary from the Member States:**

GUM – Component 2 refers to the development of Member States' National Guarantee Management systems. This work can mainly be done in parallel with GUM – Component 1. There is a project interdependency on the National Import System of each Member State, where they have multi-Member States' guarantees involved.



BG, IE and ES implemented national GUM systems. The guarantee management systems for LV and PL have also been implemented in their National Import systems. EE, FI, LV and SE have indicated that technical specifications will not be applicable in their case given that there is no interface in the external domain to the trader. All of the other Member States interrogated have reported that the activities associated with the technical specifications stage are not yet initiated.

Member States have indicated predominantly a low risk level on the on-time delivery of the project, while assessing the complexity as being medium/low.

The potential causes evoked for delay are the following: complex functionalities and interfaces with other customs systems, lack of transparency and information on the change in concepts with regards to GUM, lack of human and financial resources and delays in budget allocation. Many Member States updated their planning and while most of them are still in line with the dates specified in the Work Programme, there are some Member States which are reporting delays in operations<sup>30</sup>.

**Detailed Responses:**

Table 22 provides the individual Member States’ responses to the survey:

MS	Complexity Rating	Risk Level	Additional Comments
AT			
BE			
BG	4	Low	According to BG, GUM Component 2 is part of the import system, therefore will be updated at that time. BG indicated that during the conformance testing activities of GUM Component 2 connectivity with National Import Customs System and National Accounting System was also tested. For Component 1, BG is anticipating to start work in summer 2022 to meet the deadline, having the June 2025 deadline included in the tender. BG is implementing IT projects using the TOGAF/ADM and RUP methodologies.
CY	6	Low	For GUM Component 2, the national part CY intends to be operational by 02/06/2025. Component 1 is centralised.
CZ	2	Low	CZ mentioned that no technical specifications are available, therefore no development is planned for the moment, having provided indicative dates at this stage: technical specifications on 01/01/2024, conformance testing starting in January 2025 and deployment on 01/06/2025.
DE	4	Low	According to DE this project will be implemented in the major release of the national IT-System ATLAS (Release 10.3) for which the preparatory activities have not yet started. As regards current planning of DE, Conformance Testing activities are not yet initiated nor planned, with no determined Deployment approach.
DK	5	Med	The project is currently undergoing planning regarding all Conformance Testing and Deployment related activities.
EE	4	Med	EE indicated that the original start of the project was planned for 2021, but the initial plan could not be reached due to lack of financial resources. Depending on the situation with funding, EE has the intention to implement the national component in the first half of 2023. An iterative approach is envisaged for the system development.
ES	1	Low	For GUM, ES advised that they had implemented their national part in May 2019 and will be able to meet the planning for Component 1. System is currently in production.

<sup>30</sup> FI and FR reported in their NPP possible delays regarding operations deadline, due to complex integrations required for the system.

MS	Complexity Rating	Risk Level	Additional Comments
FI	5	Med	For GUM, a new system is being developed and will be integrated with NCTS first and then with the national import system. At the moment FI does not have detailed plans for the connection to CRS for multi-MS guarantees. FI explained that given that there is no interface to customers from GUM Technical Specifications will not be needed. A medium level of risk on the on-time delivery of the project is indicated, considering the many integrations required for GUM.
FR			
GR	3	Low	GR mentioned that regarding GUM Component 2, the activities related to all milestones are not yet initiated, given the delay to start the call for tender procedure was identified.
HR	5	Med	HR indicated that they have not yet nominated a project team for the GUM national component. An analysis of available documentation and of the current implementation of the guarantee system is underway Overlapping activities on other projects and limited budget are being identified as possible primary causes for delays on the on-time delivery of the project. At the time of writing, HR is in the analysis phase regarding the approach to development.
HU	5	Med	In relation to GUM, HU has already implemented a national system, while also having the NCTS guarantee system. Currently it is uncertain which system will handle the new requirements, therefore this work has not been planned yet.
IE	3	Low	There is already a national system for national guarantees, therefore IE are not actively looking at the planning of this work yet as it comes later in the overall UCC IT planning. They also need more clarity on what they will have to do regarding the connection to the central system in due course.
IT	6	Low	At the moment no strategy has been defined for the system development, however within further activities IT has mentioned the concretisation of Technical Specifications. It is envisaged the completion of both components within the deadlines provided with the national component updated for Q4 2024.
LT	6	Low	For the GUM project, all functionalities required for the national Component 2 have been developed and are being tested, with a view to go in production in September 2022.
LU			Regarding GUM, LU stated that as Component 1 would be largely implemented in CDS, the development is progressing according to planning and it has been included in the tender and the indicative deployment date of 01/10/2024.
LV	5	Low	For GUM a new system for all revenues and payments and not just for customs is being developed by LV. Currently they are focusing to be on-time with the national import system for the trans-European aspect. LV has already updated nationally in conjunction with their existing import system.
MT	5	Low	According to MT difficulties were encountered related to identifying the necessary information/documentation for this project. At the same time regarding the planned deployment strategy, the system will be deployed with full functionality. At the current stage MT has not identified any issues related to the timely development of the system.
NL	3	Low	NL explained that for GUM Component 2 there is no Conformance Testing campaign foreseen, having only the national component without S2S (server-to-server) connection with TAXUD or other MSs. Q2 2022 marked the start for the development of the system, using both an iterative and agile approach. In 2022 the updated Annex A will be approved, having the updated data elements and data structure as input for the UCC



MS	Complexity Rating	Risk Level	Additional Comments
			<p>guarantees that will need to be registered, managed and monitored in the national GMS (DZA).</p> <p>The complexity for GUM will depend on the BPM's, updated Annex A, data structure and all the answers to the open issues in the PG CDS-GUM.</p> <p>NL will build the new Guarantee Management System (DZA) for all UCC, Excise and other types of guarantees. DZA will replace the current GMS (KIS and GMS for NCTS).</p>
PL	4	Low	PL indicated that they already have their national system implemented. The system will need to be updated once the common specifications for the trans-European aspects are published, however PL does not envisage any risks of delay.
PT	6	High	According to PT all Conformance Testing activities will be organised as Mode 1, 2 and 3. An imminent risk for the on-time delivery of the project was identified due to the need of the implementation of a completely new National GUM System. An agile development approach will be used in order to reduce the implementation timeframe.
RO			RO expressed that under the national import system contract RO will update the existing national guarantee system and then connect to the Central System.
SE	1	Low	<p>Concerning GUM, the national system was already deployed in April 2021. Currently SE are analysing the needs for Component 1 to meet a March 2024 deployment date.</p> <p>It was indicated that Technical Specifications and Conformance Testing activities in the external domain to the trader are not applicable.</p>
SI	4	Low	None.
SK	1	High	SK advised that GUM is also linked to the entry/import system contract. SK stated that due to lack of financial and human resources the project is marked as delayed, however overall delivery is still foreseen within the Deployment deadline. Technical Specifications, Conformance Testing and Deployment activities are expected to be impacted.

Table 22: Detailed responses from Member States – GUM – Component 2

Figure 13 provides the percentage of Member States in each development phase.

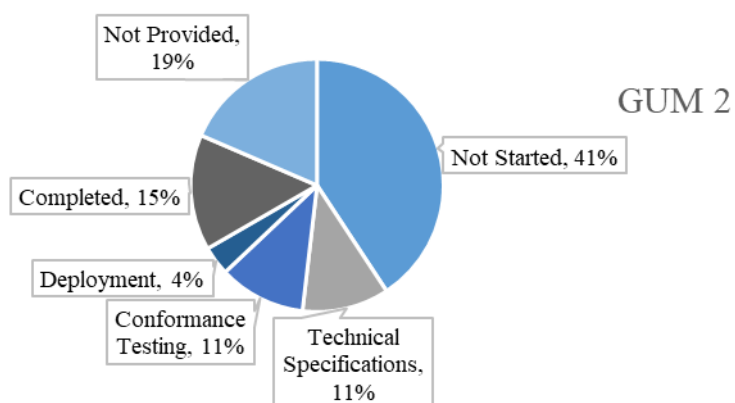


Figure 13: Summary of Survey Responses – GUM – Component 2

#### 4.1.4 Overview of Project Progress

Table 23 and Table 24 highlight any known divergences in the planning compared to the dates set in the Work Programme.

Technical Specifications			Conformance Testing		Deployment		
Target date from WP	Actual/Planned End Date	2022 % of Completion	Actual/Planned End Date	2022 % of Completion	Target date from WP	Actual/Planned Date	2022 % of Completion
30/09/2022	01/08/2022	100%	29/05/2025	0%	02/06/2025	05/09/2023	0%

Table 23: Comparison of Planned and Actual Dates – GUM – Component 1

As GUM – Component 2 has a deployment window, the ‘Deployment’ and ‘Operations’ columns are shown. If there is a difference in these two dates, this implies that a migration period is planned. The table below shows that the progress on the side of the technical specifications is going slow. In addition, there is also quite some missing information. Therefore, it is difficult to make assumptions on the timely delivery at this early stage.

In regards to the implementation, the following Member States have indicated a planned operations date that is slightly later than the deadline in the UCC Work Programme: FI and FR.

Respondee	Technical Specifications			Conformance Testing		Deployment (Start of the deployment window)			Operations (End of the deployment window)	
	Target date from WP	2022 Planned/ Actual End Date	2022 % of Completion	2022 Planned/ Actual End Date	2022 % of Completion	Target date from WP	2022 Planned/ Actual Date	2022 % of Completion	Target date from WP	2022 Planned/ Actual Date
AT		N/A	Not Provided	31/12/2024	Not Provided		01/03/2025	Not Provided		01/03/2025
BE		Not Provided	Not Provided	Not Provided	Not Provided		Not Provided	Not Provided		Not Provided
BG		28/02/2018	100%	01/12/2018	100%		07/01/2019	100%		07/01/2019
CY		N/A	N/A	N/A	N/A		02/06/2025	0%		02/06/2025
CZ		01/01/2024	0%	31/05/2025	Not Provided		01/06/2025	Not provided		01/06/2025
DE		Not provided	0%	Not Provided	0%		Not Provided	0%		Not Provided
DK		Not provided	5%	Not Provided	0%		Not provided	0%		Not provided
EE		N/A	N/A	N/A	N/A		30/09/2023	0%		30/09/2023
ES		30/06/2016	100%	31/08/2016	Not Provided		01/09/2016	100%		01/05/2019
FI		Not Provided	Not Provided	Not Provided	0%		30/06/2025	80%		30/06/2025
FR		Not Provided	80%	Not Provided	0%		Not Provided	0%		30/06/2025
GR		31/12/2024	0%	Not Provided	0%	To be defined by MS as part of the national plan	31/03/2025	0%		31/03/2025
HR	To be defined by MS	31/12/2022	0%	N/A	0%		Not Provided	0%	02/06/2025	To be defined
HU		30/11/2024	0%	01/05/2025	0%		01/06/2025	0%		01/06/2025
IE		04/10/2019	100%	04/10/2021	Not Provided		23/11/2020	Not provided		05/10/2021
IT		15/09/2019	15%	15/12/2020	0%		15/12/2020	0%		15/12/2020
LT		01/11/2021	100%	31/08/2022	100%		08/11/2022	100%		10/10/2022
LU		Not Provided	Not Provided	Not Provided	Not Provided		01/06/2025	Not Provided		01/06/2025
LV		N/A	N/A	N/A	Not Provided		03/06/2020	100%		04/06/2018
MT		30/06/2023	0%	30/04/2024	0%		01/05/2024	0%		01/05/2024
NL		Not provided	0%	N/A	N/A		Not provided	0%		01/06/2025
PL		01/06/2015	100%	Not Provided	Not Provided		15/07/2015	Not Provided		Not Provided
PT		Not provided	100%	31/07/2023	0%		30/11/2023	0%		01/12/2023
RO		30/06/2024	Not Provided	31/03/2025	Not Provided		06/01/2025	Not Provided		Not Provided
SE		N/A	N/A	Not Provided	Not Provided		17/04/2021	Not Provided		17/04/2021
SI		31/12/2022	0%	20/05/2025	0%		01/06/2025	0%		01/06/2025
SK		01/09/2023	0%	01/05/2025	0%		01/06/2025	0%		Not Provided

Table 24: Comparison of Planned and Actual Dates – GUM – Component 2

Regarding National GUM - Component 2, additional details regarding the specific percentage of completion per milestone can be seen in the following figure.

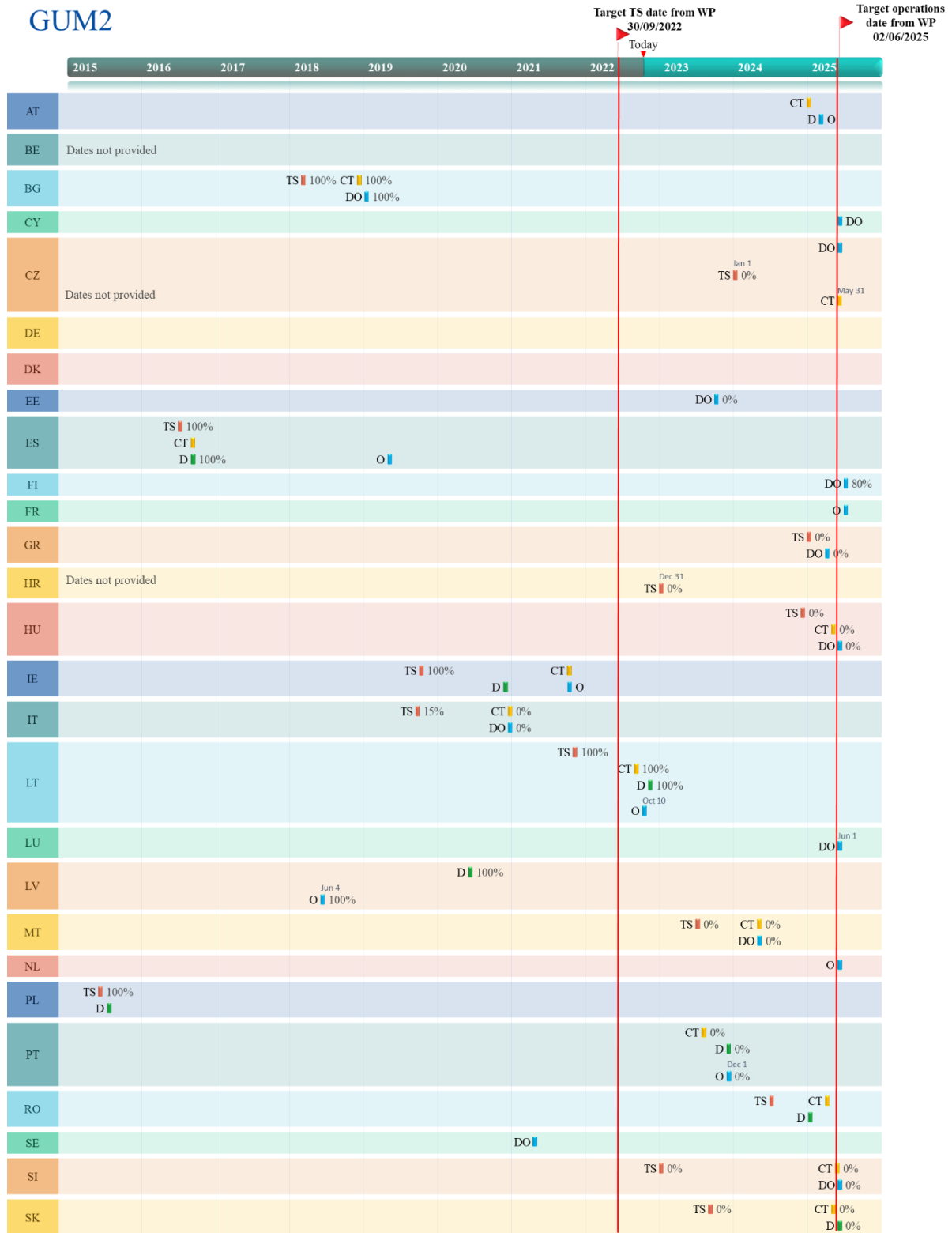


Figure 14: Percentage of Completion per Phase – GUM – Component 2

## 4.3 UCC IMPORT CONTROL SYSTEM 2 (ICS2) – RELEASES 2 AND 3

### 4.1.5 Summary of Responses

#### *ICS2 – Release 2*

##### **Summary from the Commission:**

ICS2 release 2 covers the implementation of new ENS obligations and related business and risk management processes for all the goods entering the EU by air traffic. From this release onwards, and following a positive policy decision of the Commission and Member States in December 2020, the ICS2 system will implement a Safety and Security Analytics capability. As part of Release 2, the Safety and Security Analytics capability will be integrated within the ICS2 common repository component and will implement the analytics platform accessible by MSs via CCN2 (and the Commission via UUM&DS) integrated by a dedicated portal and a data factory for real time analytics (enrichment of ENS data) connected to a common repository.

In addition to the ICS2 Safety and Security Analytics capabilities project, Release 2 poses new challenges compared to Release 1, such as the addition of three new types of economic operators acting in the air transportation supply chains and thirteen different types of ENS filings, to bring into the system more and better quality trade data of goods moving towards the EU. Release 2 includes new business models reflecting the business needs, rules and user interfaces, adding an increasing complexity of timers, data quality, data consistency rules and linking for multiple filings and arrival notifications. Furthermore, a larger volume of messages and complex conformance testing, with numerous stakeholders is expected. Lastly, the migration strategy between Release 1 and 2 will be challenging with different transition windows. DG TAXUD has initiated coordination meetings to ensure the smooth development of the system.

The work on the Operational guidance compendium for Release 2 has been completed as of Q1 2022. This work was supported by the ICS2 Project group with participants from Member States and trade representatives. At the same time, the Business continuity plan was updated to cover Release 2 operations.

The development of the central components Common Repository, Share Trader Interface, Share Trader Portal was scheduled to be finished by the 1<sup>st</sup> of July 2022. The conformance environment was ready for Member States testing as of 1st July and for economic operators testing on 1st of September 2022.

The Common Technical System Specification (CTSS) was aligned with the latest version of the Functional System Specification. Two major CTSS version were produced: one in October 2021 and one in March 2022. The March 2022 version includes the specifications applicable for Release 3, in addition to the specifications related to Release 1 and Release 2 business process.

A new version CTSS was published in September 2022. This version will integrate last changes raised by business for Release 2 and 3 processes as well as additional business processes necessary for integration of the Common Repository and Safety and Security Analytics.

The End-to-End organisation document was published for MS and EOs on 21 April 2022, having as further steps the elaboration of End-to-End scenarios.

The planning of training, aimed to prepare Customs Administrations for the ICS2 Conformance Testing was finalised, with training campaigns taking place between May - June 2022.<sup>31</sup>

ICS2 Release 2 Conformance Testing is planned to start in Q3 2022. By the end of 2022 it is expected that all NA will have started CT testing and that the majority will have finalised it. It is also expected that some EO start the CT testing as well. The EO Deployment windows ends by 1<sup>st</sup> October 2023.

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<sup>31</sup> The first eLearning training module related to business process for National Administrations has been finalized end of June 2022. An additional training module, Risk Management processes for ICS2 Release 2, has been included in the training strategy for Release 2 and agreed to be delivered in Q1 2023.

By the end of 2022, Transitions strategy and Production checklist will be produced. Those will be used in February/March 2023 to start production of Release 2.

**Summary from the Member States:**

Member States are preparing the national functional and technical specifications based on the common EU specifications provided by DG TAXUD, participating in webinars and reviewing documentation. The Member States have indicated an increase in complexity compared with Release 1, citing the same potential causes of delay as stated before for ICS2 – Release 1: the tight timelines between related projects, a complex data migration, resource constraints, impact and re-planning due to the VAT eCommerce package and the specific working circumstances caused by the COVID-19 pandemic, complex and lengthy service procurement procedures, and the numerous external stakeholders involved. A medium, respectively high-risk level on the on-time delivery of the project has been identified, while the complexity has been assessed as medium/high.

Most of the Member States are progressing well.

EE and CZ have reported delays in delivering the technical specifications due to the complexity and capacity of the IT contractor or the COVID-19 related financial challenges. At the same time, FI and SE will use the Central System, therefore will not develop technical specifications for the external domain.

PT indicated that several modes of Conformance Testing will be executed while maintaining a high risk for the timely delivery of the system due to implementation of a completely new National ICS2 System.

The other Member States that also reported to envisage timely implementation by 1/03/2023 are: BE, BG, CY, CZ, DE, ES, FI, HR, HU, IE, IT, LT, LU, LV, MT, PL, PT, SE, SI and SK (see table 27 below and adjusted to the latest developments).

**Important remark:**

Further to the planning and progress data collected from Member States and Commission services during Q1 and Q2 2022, new information has been communicated to the Commission which has not been represented in this accompanying staff working as it was not part of the methodological approach established for this document. The key information will be taken on board and reflected in the main Report itself.

Member States<sup>32</sup> have submitted a written notification asking for derogation under Article 6(4) UCC to DG TAXUD considering the delay for ICS2 Release 2 beyond the legal deadline. The derogation requests from the Member States were assessed by the Commission services in terms of the justifications provided by the specific situation of the Member States requesting it and in view of a set of common assessment criteria.

In this light the Commission has proposed an Implementing Decision<sup>33</sup> granting a derogation to Austria, Denmark, Estonia, France, Greece, Netherland and Romania for the Import Control System 2 to use means for the exchange and storage of information other than electronic data-processing techniques in relation to goods transported by air. The derogation is proposed to apply from 1 March 2023 until 30 June 2023.

**Detailed Responses:**

Table 25 provides the individual Member States’ responses to the survey:

MS	Complexity Rating	Risk Level	Additional Comments
AT			
BE			

<sup>32</sup> Member States that have indicated delays in implementation of ICS2 Release 2 beyond the deadline of 1/03/2023: AT, DK, EE, FR, GR, NL and RO.

<sup>33</sup> This reflects the state of play at the moment of the finalisation of the Report on 11 November 2022.

MS	Complexity Rating	Risk Level	Additional Comments
BG	5	Low	In conjunction with the development of the national components of ICS2 Release 2, BG appreciates as necessary the upgrade of the National Import System and the National Risk Analysis System. Regarding the ICS2 Release 2 national components development, the Bulgarian customs administration uses agile and an iterative approach, combined with an adapted and combined implementation of two methodological frameworks. ADM and RUP, each with its specific purpose. ADM aims implementation and maintenance of the overall BCA Architecture, while RUP is used to manage the software lifecycle of the software solution. According to RUP, ICS2 Release 2 is expected to be in the middle of the Transition phase by the end of 2022. At the same time, it was indicated that the implementation of Release 2 is expected to be deployed in time for the 01/03/2023 deadline, with Release 3 following a similar trend. At the time of writing the tender procedure is ongoing for Release 3.
CY	6	Low	For Release 2, CY confirmed that they will be operational by 01/03/2023.
CZ	6	Med	CZ appreciated that milestones might be delayed due to complexity and the capacity of the IT contractor. However, overall delivery is still foreseen within the Deployment deadline. At the same time, the deadline of publication of Technical Specifications will be postponed. CZ indicated that Release 2 technical specifications will be available on 30/06/2022, with Conformance Testing starting in December 2022 and deployment on time for 01/03/2023.
DE	4	Low	According to DE Release 2 will be implemented as part of the national IT-System ATLAS (Release 10.1). All Milestones related to Economic Operators will be published by EU-COM and the Technical Specifications for the external communication via STI-ICS2 will also be provided by EU-COM. Conformance Testing between Economic Operator and EU-COM will be scheduled individually in coordinaton with the concerned Member State. The national elaboration Phase as well as the construction have started. DE emphasized the increased difficulty in identifying all of the relevant stakeholders affected by Release 2, a phenomenon easily observed when trying to have all traders compliant on the first day.
DK	5	Med	DK appreciates that a need to clarify the business value chains should be prioritised at EU level, before technical development and testing begin. The identified cause for delay by DK is referring to the complexity level associated with the system development. Technical specifications and refinement is ongoing, as is onboarding of Economic Operators and preparation for Conformance Testing.
EE	5	High	Due to COVID-19 related financial challenges, the ICS2 Release 2 project deadline had to be postponed, with a new deadline being set for 01/10/2023. All milestones are expected to be impacted by the change. At the same time, the Estonian Tax and the Customs Board have raised the question of financing with high priority in all relevant instances.
ES	6	Med	ES mentioned that due to the complexity of specifications not fully detailed at the beginning of the project and the complexity of functionalities and Conformance Testing activities, an agile approach is being used in order to minimise the impact on the delivery of the system. At the same time, the Release 2 deployment date of 01/03/2023 was confirmed, however ES expressed some concerns about the readiness of the traders.
FI	6	High	Regarding ICS2 Release 2 and 3 no changes to the timing are envisaged. FI indicated that there will be some problems in relation to the readiness of traders. The work on Release 3 has not started yet as they are focused on Release 2.

MS	Complexity Rating	Risk Level	Additional Comments
FR	4	Med	For Release 2, FR indicated a delay of 3 months given the difficulties encountered in operation of Release 1 (e.g. in May 2021 20% of messages were lost, which led to delay in work on R2, ultimately affecting the CT planning, in particular Mode 2.). At the same time, changes are required regarding interactions with postal services.
GR			For ICS2 – Release 2 GR indicated that a different contractor will be used, which could lead to possible issues for Release 2. The deployment deadline is still envisaged for 01/03/2023.
HR	6	High	It was confirmed by the HR colleagues that they are on track for the Release 2 date of 01/03/2023. This will include AN for air mode of transport and the AN for maritime will come with Release 3 on 01/03/2024. At the time of writing a national component for economic operators is being created, following stricter and progressive plans.
HU	3	Med	HU expects to be on time with Release 2 for 01/03/2023, however they are concerned about all traders being ready.
IE	5	Med	The complexity of the system is considered to be high given the requirement to engage with Trade and their collective collaboration. A new format for messages is expected and the collaboration between economic operators and delivery of this is close to AES and NCTS Phase 5. For AN, it was mentioned that arrival information is already obtained for the airport and maritime authorities on all flights and ships so specific arrival notification messages are not needed. IE is currently examining how this will integrate with the Shared Trader Interface for ICS2.
IT	5	Low	Release 2 will be deployed on time, having shared specifications with traders with further engagement envisaged, however there are concerns about the trader readiness. IT stated that an iterative approach with continuous feedback is being used for the system development.
LT	6	Low	LT envisages a timely deployment by March 2023 for ICS2 Release 2. The system will be developed using an agile approach. Some delay regarding the final Technical Specifications publication date is expected.
LU			The planning for ICS2 Release 2 follows the WP schedule.
LV	6	High	For Release 2, LV is planning to meet the original deadline of 01/03/2023, however their contractor will provide software only in mid-January 2023, therefore it will depend on the quality and readiness of Conformance Testing activities. At the same time, LV mentioned that an iterative approach is being used in the system development.
MT	6	Med	DK indicated that numerous activities concerning various systems are happening all in the same period, which ultimately is causing the delay of the system and impacts Conformance Testing activities. At the same time MT mentioned that overall the delivery is still foreseen within the Deployment deadline.
NL	5	High	According to NL, the ICS2 – Release 2 will be developed using an agile approach, with the initiation of activities yet to be decided considering other priorities. This approach starts with describing a high level design of the features and of the IT-solution, in the so called “Epic” format. NL has associated to this project a high risk on the on-time delivery of the project given the intricacies of this project. To this it can be added Brexit, e-commerce, the labour market and the COVID-19 pandemic. At the same time, NL has indicated that in order to reduce the impact on milestones, the minimisation of the scope is under consideration.



MS	Complexity Rating	Risk Level	Additional Comments
			<p>NL explained that the complexity of the project has increased considering that a lot of external stakeholders (carriers, freightforwarders and their software providers) and internal stakeholders (e.g. policy makers, risk analysts, control officers, etc) are being involved. In this light, between all of the parties has to be maintained a strong communication in order to be able to define the national requirements.</p> <p>Another complexity factor refers to NL's National Entry System which is composed of several components that are being developed by 10 internal development teams, with most of them not been dedicated ICS2 teams. NL emphasized that within the organisation, the priorities of these teams have to be aligned, together with the definition of their workpackages. On the same note, NL mentioned the context of MASP and the fact that a lot of projects are running in parallel, making use of the same development expertise.</p> <p>At the time of writing, all milestones (Construction phase, Conformance Testing and Deployment) are expected to be delayed, with the deadline being pushed to Q4 2023.</p>
PL	5	Low	For ICS2 Release 2, PL plans deployment on 01/03/2023. They are on track with the development and testing.
PT	6	High	PT indicated that due to the implementation of a completely new National ICS2 System the on-time delivery of the project could be at risk, however the deployment is still foreseen for March 2023, with minor concerns regarding traders readiness. In this light, an agile development method will be used to reduce implementation timeframe.
RO			Same response as for AN.
SE	4	Med	<p>SE identified a risk pertaining to the economic operators, underlining that it is challenging to reach out an contact all the concerned parties. During 2022 parts of ICS2 will be ready and deployed, but will not be exposed to web service until start of Conformance Testing in January 2023.</p> <p>SE confirmed that for ICS2 Release 2 they are on track to deploy the system on 01/03/2023, with migration for traders until 01/10/2023. However, SE expressed some concern about the readiness of traders. On the same note, SE indicated that for Release 3 all milestones are on track.</p>
SI	5	Med	<p>SI explained that the complexity is caused by relatively new processes and functionalities, sequences of electronic messages, R&amp;C and the practical identification of persons who will declare the data.</p> <p>At the same time an increased workload of external contractors with other MASP projects (eg. transit, export etc.) are increasing the complexity of the development of the system.</p> <p>However, Release 2 is planned to be deployed in the expected deadline.</p>
SK	1	Low	Communication has been initiated between Financial Directorate and the potential provider of the system regarding the development approach. Release 2 is planned to be on-time, having minor concerns regarding trader readiness.

Table 25: Detailed responses from Member States – ICS2 – Release 2

Figure 15 provides the percentage of respondents (Member States plus the European Commission) in each development phase<sup>34</sup>.

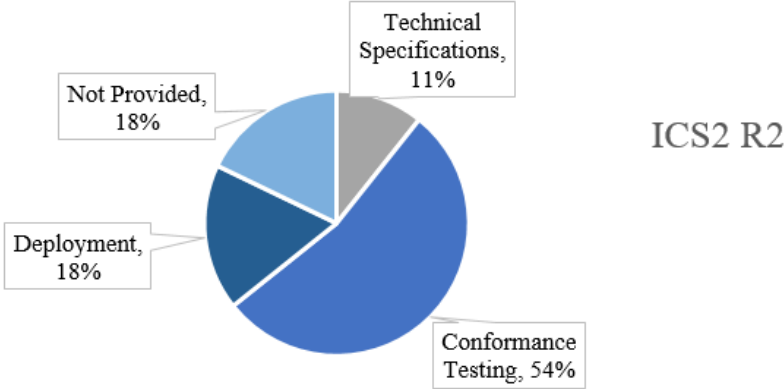


Figure 15: Summary of Survey Responses – ICS2 – Release 2

**ICS2 – Release 3**

**Summary from the Commission:**

The aim of the trans-European project on UCC ICS2 Release 3 is to enhance the functional scope of ICS2 with support for further modes of transport and implement the complete UCC requirements for all “entry of goods” use cases building on ICS2 Release 1 and Release 2. This Release will cover the implementation of new ENS obligations and related business and risk management processes for all goods entering the EU by maritime, inland waterways, road and rail traffic (including goods in postal consignments transported by these means of transport). This Release 3 will also include further extension for Safety and Security Analytics.

The Release 3 Common Technical System Specifications were delivered by March 2022. The further updates are to implement additional business changes and messages related to integration with Safety and Security Analytics (Enrichments). By the end of 2022, the first iteration of software implementing the Release 3 scope is scheduled.

The end of ICS2 release 3 deployment window is rescheduled from Q4 2024 to Q1 2025 in order to align it with NCTS - Phase 6. This change allows Member States and economic operators to have a sound legal and IT basis to smoothly transition from the ENS requirements covered by ICS/NCTS - Phase 5 into the new ENS requirements under ICS2/NCTS - Phase 6.

**Summary from the Member States:**

Considering the ICS2 specifications, the Member States are not required to implement new functionalities for Release 3. Conformance testing is therefore not applicable for Member States for Release 3, it will only apply for economic operators.

Additional work is related only to providing support to economic operators, namely supporting them in the project implementation and testing of applications interfacing with ICS2 Release 3.

<sup>34</sup> The figure related to Conformance Testing includes the work from the Commission in regards to the preparation of the CT environment and coordination for Member States.

The Member States have identified potential causes for delay: the intricacies of this project, with all the new processes and the new software, the tight labour market, the impact caused by the COVID-19 pandemic and lack of human resources caused by crossed over use for different projects and the workload created by Release 2.

**Detailed Responses:**

Table 26 provides the individual Member States’ responses to the survey:

MS	Complexity Rating	Risk Level	Additional Comments
AT			
BE			
BG	5	Low	BG explained that TAXUD's functional and technical specifications are being used for ICS2 - Release 3, upgraded with the national requirements in the procedure for selection of the contractor for the development of national components. At the same time, they expressed the need to upgrade the national import system and the national risk analysis system in conjunction with the development of national components.
CY	6	Low	According to CY, for Release 3 the technical specifications are planned for 15/03/2023, conformance testing for February 2024 and operations on 01/03/2024. All of these milestones are within the UCC Work Programme planning timelines.
CZ	4	Med	Release 3 has a minor impact on CZ because of the mode of transport, with the impact focusing on the risk analysis. The deployment is planned for 01/03/2024. CZ also mentioned that they have two development contractors, one for the import related systems and another for risk analysis systems.
DE	4	Low	DE stated that ICS2 - Release 3 will be implemented as part of the national IT-System ATLAS - Release 10.2, for which the preparation activities have not yet started.
DK	5	Med	Technical Specifications related activities are ongoing with the onboarding of the economic operators.
EE	3	Med	EE explained that in 2022 the ICS2 - Release 3 activities are not representing a main focus. At the same time, it is anticipated that due to existing and persistent financial risks there is a risk for delay for the timely delivery of the system.
ES	6	Med	Same response as for ICS2 – Release 2.
FI	6	High	ICS2 - Release 3 involves all other modes of transport, being dependent on NCTS Phase 6 timetable, therefore it is expected that the complexity of the system to increase. For more details please see ICS2 – Release 2.
FR	3	Low	Given the transition from Release 2 to Release 3 and the already stated delay for the latest, a 3 months delay is envisaged for ICS2 R3.
GR	6	Med	GR indicated that due to delay in call for tender procedures the Conformance Testing and Deployment activities will be impacted with a possible subsequent effect on the on-time delivery of the project. Internal discussions are ongoing in order to minimise these effects.
HR	6	High	Same response as for ICS2 – Release 2.
HU	3	Low	None.
IE	4	Med	Contingent on successful moves to all other UCC systems by the end of the transition period, both economic operators and Customs Authorities will still be under pressure.
IT	5	Low	None.
LT	6	Low	The system will be developed using an agile approach.
LU			LU expressed that for Release 3 they need a budget and the tender process to be finished, therefore the planning has not been properly assessed yet.

LV	6	High	LV explained that their planning takes into consideration delays caused by the the phased approach used in the development of the system. LV understanding is that ICS2 – Release 2 Technical Specifications will be used for ICS2 – Release 3 as well, with a similar time frame for deployment. However, it is appreciated that the Trade will not be willing to develop and test right now, therefore ICS2 R3 must have separate Conformance Testing activities in the end of 2023, beginning of 2024. A high risk of missing the deadline was underlined based on late start of development due to late procurement. Considering this, Conformance Testing and Deployment activities will be impacted.
MT	6	Low	None.
NL	5	High	Same response as for ICS2 – Release 2.
PL	4	Low	PL has not started the analysis of the Release 3 requirements yet, given that currently, the entire workload has been put on the implementation of the Release 2. For this reason, the analytical work on the ICS2 R3 will start when it will be certain that the deadline for the ICS2 R2 implementation can be met. Additionally, there is a risk concerning the funding for the development of Release 3 as it has not been released yet.
PT	6	High	The update of National ICS2 System will take place, with impact on ICS2 – Release 3 and to the connection to Central System. An agile approach on development will be used in order to reduce implementation timeframe.
RO			Same response as for ICS2 – Release 2.
SE	4	Med	SE identified a risk pertaining to the economic operators, underlining that it is challenging to reach out and contact all the concerned parties.
SI	5	Med	An increased workload for external contractors with other MASP projects (eg. transit, export etc.) is impacting the timely delivery of the system.
SK	1	Low	None.

Table 26: Detailed responses from Member States – ICS2 – Release 3

Figure 16 provides the percentage of respondents (Member States plus the European Commission) in each development phase<sup>35</sup>.

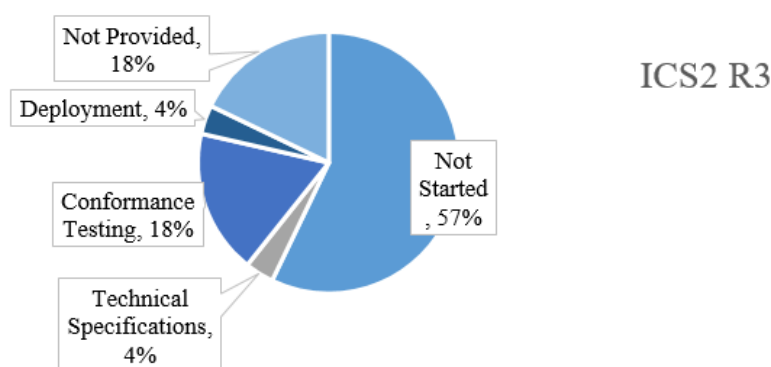


Figure 16: Summary of Survey Responses – ICS2 – Release 3

<sup>35</sup> The figure related to Conformance Testing includes the work from the Commission in regards to the preparation of the CT environment and coordination for Member States.

#### 4.1.6 Overview of Project Progress

Table 27 and Table 28 indicate the percentage of completion as of the end of 2022 in comparison to the target dates set forth in the UCC Work Programme.

The target date set for the technical specifications is in reference to the common technical specifications. Member States have reported the percentage of completion regarding their own national technical specifications, which are to be prepared incrementally for the three releases. The Commission will perform adjustments to the specifications for Releases 2 and 3 as per the MASP-C. In regards to the implementation of ICS2 – Release 2, the following Member States have a planned deployment date that is later than the deadline in the UCC Work Programme: DK, EE, FR, GR, NL and RO.

Respondee	Technical Specifications			Conformance Testing		Deployment		
	Target date from WP	2022 Planned/ Actual End Date	2022 % of Completion	2022 Planned/ Actual End Date	2022 % of Completion	Target date from WP	2022 Planned/ Actual Date	2022 % of Completion
European Commission	30/06/2018	12/11/2019	100%	N/A	N/A	01/03/2023	01/03/2023	Not Provided
AT		01/03/2022	Not Provided	28/02/2023	Not Provided		01/03/2023	Not Provided
BE		Not Provided	Not Provided	Not Provided	Not Provided		01/03/2023	Not Provided
BG		31/03/2022	100%	15/12/2022	100%		01/03/2023	0%
CY		31/10/2022	100%	20/02/2023	0%		01/03/2023	0%
CZ		31/10/2022	100%	14/02/2023	50%		01/03/2023	50%
DE		01/06/2022	70%	February 2023	20%		01/03/2023	90%
DK		31/10/2022	100%	14/02/2023	100%		Delayed	0%
EE		31/12/2022	40%	N/A	N/A		03/10/2023	0%
ES		01/03/2022	100%	15/09/2022	100%		01/03/2023	0%
FI		31/03/2022	N/A	30/09/2022	100%		01/03/2023	95%
FR		31/12/2022	100%	15/04/2023	50%		01/06/2023	80%
GR		Not Provided	Not Provided	Not Provided	Not Provided		01/03/2024	Not Provided
HR		31/10/2022	100%	10/02/2023	20%		01/03/2023	85%
HU		25/11/2020	100%	10/02/2023	0%		01/03/2023	90%
IE		28/01/2022	100%	28/03/2023	40%		01/03/2023	0%
IT		31/12/2021	100%	14/02/2023	50%		01/03/2023	0%
LT		30/07/2022	100%	15/02/2023	50%		01/03/2023	0%
LU		04/11/2021	Not Provided	28/02/2023	Not Provided		01/03/2023	Not Provided
LV		10/01/2022	100%	01/03/2023	40%		01/03/2023	0%
MT		31/08/2022	100%	31/01/2023	50%		01/03/2023	90%
NL		31/12/2021	100%	15/09/2023	50%		01/11/2023	0%
PL		30/06/2022	100%	18/11/2022	0%		01/03/2023	0%
PT		01/09/2022	100%	01/02/2023	0%		28/02/2023	0%
RO		30/11/2021	Not Provided	31/01/2023	Not Provided		01/10/2023	Not Provided
SE		N/A	N/A	14/02/2023	0%		01/03/2023	0%
SI		01/04/2022	100%	18/02/2023	100%		01/03/2023	90%
SK		30/10/2022	75%	14/02/2023	50%		01/03/2023	50%

Table 27: Comparison of Planned and Actual Dates – ICS2 – Release 2<sup>36</sup>

<sup>36</sup> Several dates provided may differ given the derogation process undergoing.

In regards to the implementation of ICS2 – Release 3, the following Member States have a planned deployment date that is later than the deadline in the UCC Work Programme: CY, FI, FR, GR and NL. AT and DK did not provide data.

Respondee	Technical Specifications			Conformance Testing		Deployment (Start of the deployment window)		
	Target date from WP	2022 Planned/ Actual End Date	2022 % of Completion	2022 Planned/ Actual End Date	2022 % of Completion	Target date from WP	2022 Planned/ Actual Date	2022 % of Completion
European Commission	30/06/2018	30/03/2022	100%	N/A	N/A	01/03/2024	01/03/2024	Not Provided
AT		Not Provided	Not Provided	Not Provided	Not Provided		Not Provided	Not Provided
BE		Not Provided	Not Provided	Not Provided	Not Provided		01/03/2024	Not Provided
BG		31/12/2022	100%	15/12/2023	0%		01/03/2024	0%
CY		15/09/2023	0%	22/02/2024	0%		01/04/2024	0%
CZ		30/06/2023	0%	14/02/2024	0%		01/03/2024	0%
DE		N/A	N/A	Not Provided	Not Provided		01/03/2024	Not provided
DK		Not Provided	0%	Not Provided	0%		Not provided	0%
EE		01/06/2023	0%	01/02/2024	0%		01/03/2024	0%
ES		01/03/2022	100%	15/09/2023	0%		01/03/2024	0%
FI		31/03/2024	0%	31/12/2024	0%		31/03/2025	0%
FR		31/03/2023	100%	15/04/2024	75%		01/06/2024	80%
GR		30/04/2023	0%	28/02/2024	0%		31/03/2024	0%
HR		10/10/2023	0%	01/02/2023	0%		01/03/2023	0%
HU		31/08/2023	0%	01/02/2024	0%		01/03/2024	0%
IE		28/01/2022	0%	28/03/2024	0%		01/03/2024	0%
IT		Not Provided	0%	Not Provided	0%		01/03/2024	0%
LT		30/07/2023	80%	15/12/2023	0%		01/03/2024	0%
LU		01/07/2023	Not Provided	28/02/2024	Not Provided		01/03/2024	Not Provided
LV		10/01/2022	100%	01/03/2023	0%		01/03/2023	90%
MT	01/02/2024	0%	31/05/2024	0%	01/10/2024	0%		
NL	01/10/2023	100%	15/09/2024	0%	01/11/2024	0%		
PL	Not Provided	0%	Not Provided	0%	01/03/2024	0%		
PT	01/09/2023	0%	01/02/2024	0%	01/03/2024	0%		
RO	Not Provided	Not Provided	31/01/2024	Not Provided	29/02/2024	Not Provided		
SE	Not Provided	N/A	15/02/2024	0%	01/03/2024	0%		
SI	01/10/2023	0%	17/02/2024	0%	01/03/2024	0%		
SK	N/A	0%	14/02/2024	0%	01/03/2024	0%		

Table 28: Comparison of Planned and Actual Dates – ICS2 – Release 3

Regarding **ICS2 – Release 2**, additional details regarding the specific percentage of completion per milestone can be seen in the following figure.

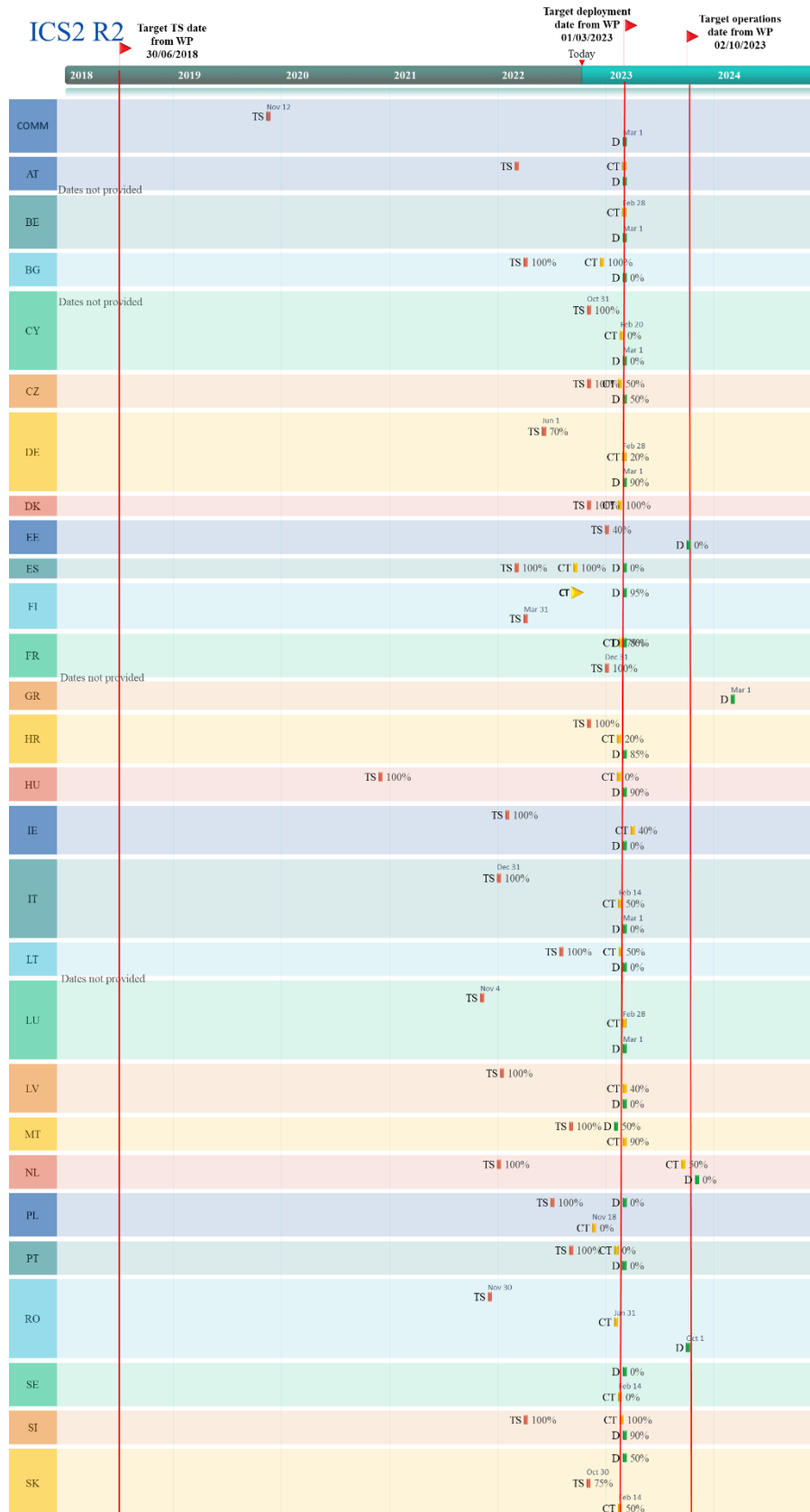


Figure 17: Percentage of Completion per Phase – ICS2 – Release 2



Regarding **ICS2 – Release 3**, additional details regarding the specific percentage of completion per milestone can be seen in the following figure.

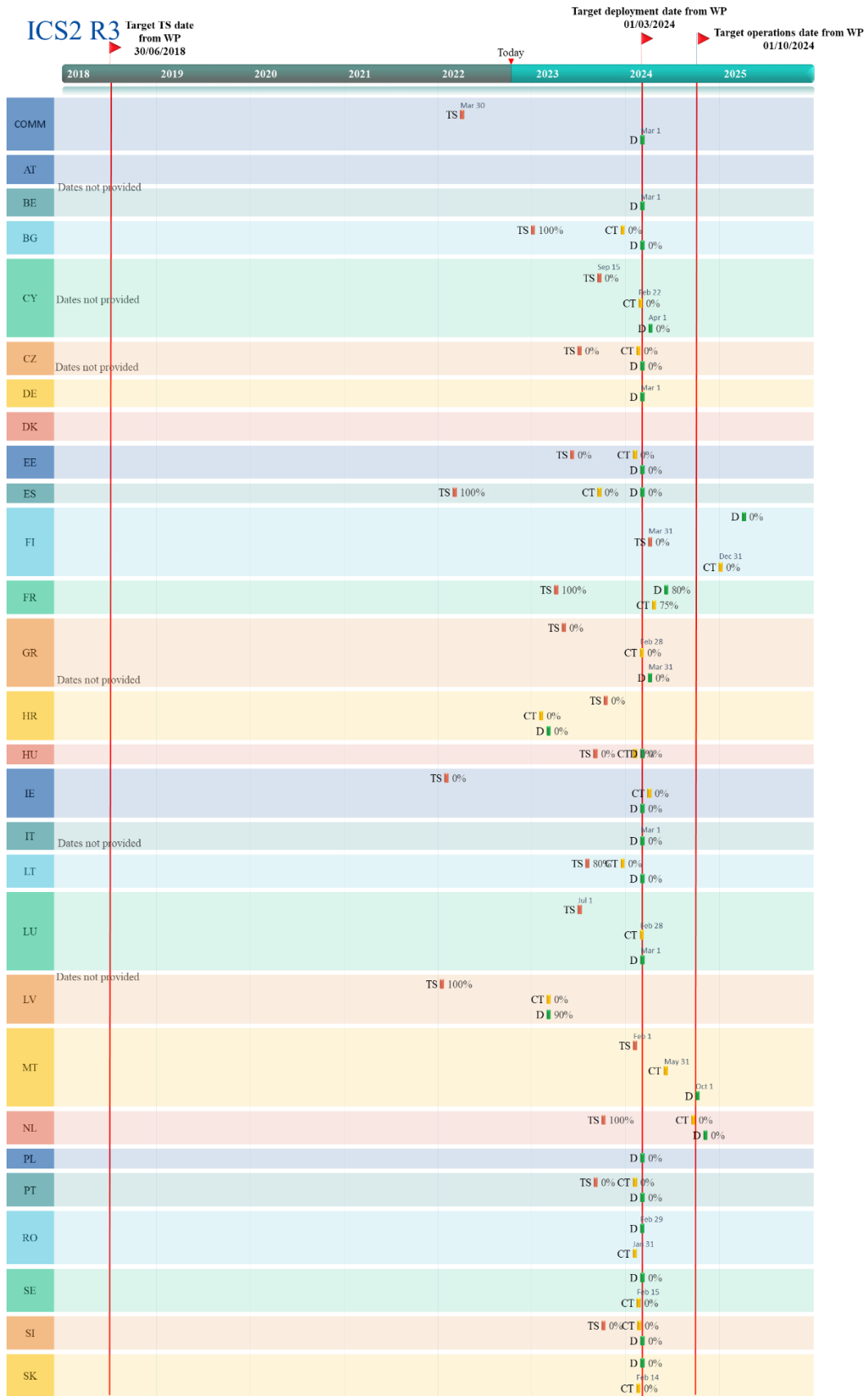


Figure 18: Percentage of Completion per Phase – ICS2 – Release 3

#### 4.4 UCC PROOF OF UNION STATUS (POUS)

The UCC Proof of Union Status (PoUS) is a trans-European system designed to allow storage, management and retrieval of certain types of documents (e.g. T2L, T2L/F, customs goods manifest) that traders provide to prove the Union status of their goods. The system is meant to improve the uniformity of the procedures across the European Union and contribute to the establishment of a more consistent, harmonised and thus simplified process related to customs clearance for Union goods.

A system will be created that will include a Central Repository for the storage and exchange between Customs Authorities across all Member States of data and documents dealing with proof of Union status.

The project is split into two phases:

- Implementing the electronic T2L (F) document with all the necessary functionalities (deployment planned for 01/03/2024);
- Implementing the electronic Customs Goods Manifest (CGM), including the information exchange with the European Maritime Single Window environment (EMSW<sup>37</sup>).

#### 4.1.7 Summary of Responses

##### *PoUS – Phase 1*

##### **Summary from the Commission:**

Technical and System Specifications were completed in Q1 2022. An agile-like development approach is being used for the project, progressing according to the planning set by the UCC Work Programme. According to the Work Programme the component is anticipated to enter into production on 01/03/2024.

At the time of writing, the construction phase is in progress and it is planned to end in November 2022. Conformance testing is envisaged to start this year.

##### **Summary from the Member States:**

Member States have the option of using the central PoUS system or developing their own national application. Several Member States conveyed their intention to use the system developed by the Commission: AT, BE, BG, CY, CZ, DE, DK, EE, FI, FR, HR, HU, IE, LT, LU, NL, PT, RO, SE, SI and SK, while ES and PL mentioned that they would use a national system. CZ indicated that they have completed technical specifications.

##### **Detailed Responses:**

Table 29 provides the individual Member States' responses to the survey:

MS	Complexity Rating	Risk Level	Additional Comments
AT			AT has decided to use the Central System for PoUS. They confirmed that it will be difficult to comply with the legal deadlines considering other priority projects (NCTS, etc.).
BE			BE confirmed that they will not be able to comply with the legal deadlines considering other priority projects (NCTS, etc.).
BG	3	Low	BG is implementing IT projects using the TOGAF/ADM and RUP methodologies. BG will use the Central System, however the connection to risk analysis nationally needs to be analysed.
CY	6	Low	CY confirmed that they will not be ready with the implementation within MASP. They will start analysis in April/May 2023 and finalise by end 2023. The current offer indicates end of development by March 2023.
CZ	4	Low	CZ advised that for PoUS there are no delays expected and that the planning is set in accordance with the MASP. CZ is using the Central System.

<sup>37</sup> The deployment is planned for 02/06/2025.

MS	Complexity Rating	Risk Level	Additional Comments
DE	3	Low	<p>DE will make use of the central PoUS provided by EU-COM, therefore a national development with specific interfaces to the economic operator will not be needed. This Project has a link to the project "UCC Presentation Notification" when the Proof is used at Presentation Customs Office. For that purpose the "National Entry Systems" will be updated as part of the national IT-System ATLAS. Technical specifications will be defined to the extent necessary for the integration of the central PoUS web services.</p> <p>A first preliminary plan was submitted in February 2022, containing the following milestones: Development start: Q1 2023, Development end: Q3 2023, National testing start: beginning of Q4 2023, National testing end: end of Q4 2023.</p> <p>DE emphasized that business discussions are ongoing about interfacing with national risk analysis, when a proof should be endorsed/registered. The business value (especially the benefit for the Authorised Issuer) is being questioned and the technical constraints that national RA (risk analysis) systems are not designed to interface with central systems need to be considered.</p>
DK			DK will use the Central System and confirmed that they will not be ready within MASP. They still require to assess if RA integration is to be developed, with the option to choose a fully manual input).
EE	2	Low	<p>EE is planning to use the Central System, however delays are being anticipated related to introducing the connection to the risk analysis, without being considered a blocking issue. EE plans to have this completed by 01/03/2024.</p> <p>A preliminary plan has been set: Development start: 01/11/2022, Development end: 30/09/2023, National testing start: 01/10/2023, National testing end: 30/11/2023. At the current moment, EE is reporting as primary causes for delay: the focus being shifted on other priority projects and the financial issues.</p>
ES	4	Med	<p>The reasoning behind the choice of developing a national solution for PoUS, rather than using the central one stands behind the need to integrate with the suite of national applications that ES has. ES indicated that it is easier for them to develop within their environment than to integrate an external product, given that they already have a national PoUS system.</p> <p>A preliminary plan has been set: Development start: Q1 2023, Development end: Q4 2023, National testing start: early September 2023, National testing end: Q1 2024.</p> <p>Other ongoing UCC projects are causing disruption in the initial plan for the system. ES is trying to minimise the impact on the on-time delivery of the project by running several activities in parallel to mitigate the delay. In this light, Technical Specifications are expected to be completed as initially scheduled.</p> <p>An agile approach is being used for the development of the system.</p>
FI	3	Low	Technical Specifications and Conformance Testing will not be applicable, FI will use the central system instead. FI confirmed that the system development is in accordance with the MASP.
FR	4	Med	FR will be using the central system solution. It was mentioned that for the moment their focus is shifted onto other projects, therefore the delivery of the system in a timely manner will be affected, in particular with great impact on Conformance Testing and Deployment activities. At the same time it was not yet decided if the Central System will be used for PoUS. FR provided a provisional deployment date for Q1 2024.
GR	3	Low	GR indicated that for PoUS they encountered delays in the call for tender procedures and that they intend to use a Central System.
HR			HR indicated that they will use the Central System for PoUS, however they will have national development to do in order to link to the risk analysis, therefore

MS	Complexity Rating	Risk Level	Additional Comments
			will not be able to achieve this in 2022. A number of Member States face the same situation and it does not affect the central system, however the risk analysis would have to be handled nationally without the connection. This would involve manual intervention, but it does not delay the rollout of the central system, as long as it can be managed until they connect. HR added that current statistics showed that there is low usage of T2L/T2LF so the impact should be small. On this note it is preferred by the NA-HR to avoid manual work if possible, therefore they will have to decide whether the auto exchange of risk analysis will be achieved in 2022 or 2023.
HU	2	Low	HU intends to use the Central System for PoUS and plan to be ready including with the national connection to risk analysis. HU wishes to develop a web service to provide risk analysis communication between the national risk analysis system and PoUS on CCN2. The development is planned to be completed before the end of the year. At the same time, the planning schedule and the dates of most national tasks and milestones need to be revised.
IE	3	Low	IE will be using the Central System for PoUS.
IT	4	Low	Italy will use the Central System which they will then need to integrate with their risk analysis system. Due to this project being further in the future, no detailed planning has yet been envisaged, however they intend to comply with the legal deadlines.
LT	3	Low	According to the information provided by LT a central PoUS system will be used. LT will not develop the link to their RA system, therefore they will use the central PoUS manually. Furthermore, as regards the integration with the national risk management system, the integration contract could be used, however there are some risks for a timely integration.
LU			For PoUS it was mentioned that LU will probably use the central solution but a definite decision has not been made yet. LU indicated that it will be difficult for them to be ready with the system within MASP. At the current stage, LU is analysing the decision as to whether or not to develop link to their RA system.
LV			LV will use the Central System. They will not be ready within MASP, unless they choose to not develop any link to their RA system. Delays have as primary causes: the current assessment regarding the need to integrate the RA system (currently not being used at national level) and other priority projects (NCTS, etc.).
MT	4	Low	MT indicated that they will be using the Central System. However there are concerns that they will not be able to develop the interface to national risk analysis in time due to working on parallel systems with a small team.
NL	3	Med	NL opted for the use of the Central System, with no impact on the national systems. At the same time, it was emphasized that the scope of Phase 1 is expected to be broader than anticipated. Therefore, an interface between the webservice and NL's national risk analysis system might be needed. NL confirmed that they will not be ready within MASP.
PL	2	Low	PL will use the national system and explained that due to some delay in signing of a contract which covers among others the deployment of the PoUS system, the implementation will be postponed for Q1 2024. The iterative development approach will be used for PoUS. PL expressed that one of their main causes for delay is having a lot of projects to develop in parallel. In 2018 PL developed the e-Status (applicants submit T2L/T2LF only electronically and SAD is no longer accepted). E-Status is part

MS	Complexity Rating	Risk Level	Additional Comments
			of their ECS export system (their AES). PL now works on the AES (in line with UCC). Only after the successful implementation of the AES will PL implement the PoUS, updating the e-Status to the PoUS requirements.
PT	5	Low	PT indicated that they will use the Central System, using an agile development approach to reduce implementation timeframe. PT confirmed that they will be ready with the implementation according to the MASP, whether or not they develop any link to their RA system.
RO			RO will use the Central System. Phase 2 is not yet planned and they expect to have delays. A primary cause for delay is represented by other priority projects (NCTS, etc.).
SE	3	Low	SE noted that the Central System will be used to a full extent, therefore Technical Specifications concerning the external domain will not be used. SE thinks it is unlikely to meet the development date of the end of 2022, however they believe they can manage to proceed with conformance testing in 2023, in order to be ready for the March 2024 deployment. At the current stage, for Phase 2 no analysis has started yet.
SI	5	Med	SI is currently in the phase of analysis on how to use Central System for PoUS together with the national Risk Analysis System.
SK	1	High	Same response as for GUM – Component 2.

Table 29: Detailed responses from Member States – PoUS – Phase 1

Figure 19 provides the percentage of respondents (Member States plus the European Commission) in each development phase<sup>38</sup>.

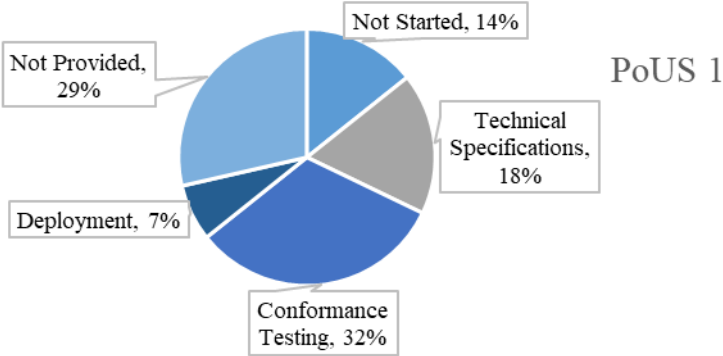


Figure 19: Project Status as per Survey – PoUS – Phase 1

**PoUS – Phase 2**

**Summary from the Commission:**

It was highlighted that the deployment date of the PoUS Phase 2 CGM (02/06/2025) is not aligned to the EMSWe deployment date (15/08/2025), therefore, since the PoUS envisaged to receive considerable volume of the CGM through the EMSW, and the gap between the dates would create unnecessary burden for Trade, discussions are undergoing to ensure that the deployment dates in the UCC WP and MASP-C of the PoUS Phase 2 CGM and the EMSWe are aligned.<sup>39</sup>

Among the activities to be carried, the Technical & System Specifications are planned starting Q1 2023. As a result of the work on the technical implementation and recent legal discussions, a Request for Change list was prepared to align the functional specifications of the T2L/T2LF.

**Summary from the Member States:**

Please see the summary from PoUS – Phase 1. Additionally, AT explained that PoUS – Phase 2 is not relevant for them.

**Detailed Responses:**

Table 30 provides the individual Member States’ responses to the survey:

MS	Complexity Rating	Risk Level	Additional Comments
AT			
BE			
BG	3	Low	BG is implementing IT projects using the TOGAF/ADM and RUP methodologies. Currently, the work on preparing the tender procedure is ongoing, having no established planning at the moment.
CY	6	Low	According to CY, no additional activities for PoUS Phase 2 are planned during 2022.

<sup>38</sup> The figure related to Conformance Testing includes the work from the Commission in regards to the preparation of the CT environment and coordination for Member States;

<sup>39</sup> Waves of external reviews are envisaged.

MS	Complexity Rating	Risk Level	Additional Comments
CZ	4	Low	CZ is planning the same scope of Conformance Testing on national level which is prepared before all new systems. In all cases, tests are running regarding communication with Economic Operators and national Helpdesk, while assessing if it is necessary with the central system and on national level with others components. CZ then advised that for PoUS there are no delays expected and the planning has been provided.
DE	4	Low	According to DE, Phase 2 is linked to the implementation of the Customs Goods Manifest of the European Maritime Single Window Initiative for which the business scope and the IT-architecture still needs to be elaborated. Planning details will be provided when the Business Case and the Vision Document are available. Considering that the expected date of deployment should be June 2025, preparation activities have not yet started.
DK			
EE	3	Low	None.
ES	4	Med	According to ES planning a full deployment of the system is expected in June 2025. Technical Specifications are expected to be completed as planned. An agile approach is being used for the development of the system.
FI	4	Low	Same response as for PoUS - Phase 1.
FR	4	Low	None.
GR	3	Low	Same response as for PoUS - Phase 1.
HR			Same response as for PoUS - Phase 1.
HU	2	Low	None.
IE	3	Low	Same response as for PoUS - Phase 1.
IT	3	Low	None.
LT	3	Low	Same response as for PoUS - Phase 1.
LU			
LV			
MT	4	Low	Same response as for PoUS - Phase 1.
NL	3	Med	According to NL external stakeholders are being involved, therefore a communication campaign will be needed to inform them on the progress and the anticipated risk on the on-time delivery of the project. A primary identified cause is expected to be the context outlined by MASP, with all the projects running in parallel and the need and use for the same development expertise. According to NL, PoUS – Phase 2 related activities will not be initiated in 2022.
PL	1	Low	An iterative approach is envisaged for the system development.
PT	5	Low	An agile development approach will be used to reduce implementation timeframe.
RO			
SE	3	Low	Same response as for PoUS - Phase 1.
SI	5	Low	Among the current activities undertaken by SI are the review and study of the PoUS specifications. An agile approach is envisaged for the system development.
SK	1	High	Same response as for PoUS - Phase 1.

Table 30: Detailed responses from Member States – PoUS – Phase 2

Figure 20 provides the percentage of respondents (Member States plus the European Commission) in each development phase<sup>40</sup>.

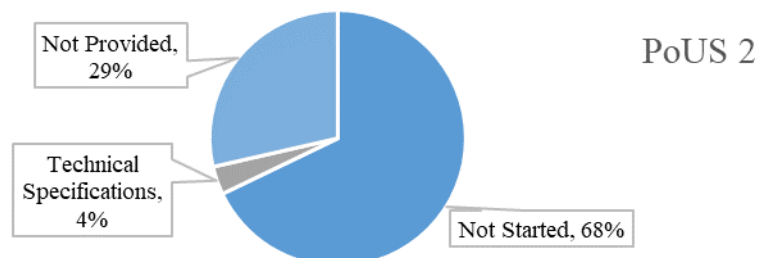


Figure 20: Project Status as per Survey – PoUS – Phase 2

#### 4.1.8 Overview of Project Progress

Table 31 and Table 32 highlight any known divergences in the planning compared to the dates set in the Work Programme.

Respondee	Technical Specifications			Conformance Testing		Deployment		
	Target date from WP	2022 Planned/ Actual End Date	2022 % of Completion	2022 Planned/ Actual End Date	2022 % of Completion	Target date from WP	2022 Planned/ Actual Date	2022 % of Completion
European Commission		31/03/2022	100%	31/03/2024	0%		01/03/2021	0%
AT		01/08/2022	Not Provided	29/02/2024	Not Provided		01/12/2023	Not Provided
BE		Not Provided	Not Provided	01/03/2024	Not Provided		01/03/2024	Not Provided
BG		12/12/2022	100%	29/02/2024	0%		01/03/2024	0%
CY		N/A	100%	22/02/2024	30%		01/03/2024	0%
CZ		01/02/2022	Not Provided	01/03/2024	0%		01/03/2024	0%
DE		31/03/2023	50%	31/12/2023	0%		01/03/2024	0%
DK		15/03/2020	0%	29/02/2024	0%		01/03/2024	0%
EE		N/A	10%	N/A	0%		01/03/2024	0%
ES		01/03/2023	50%	28/02/2024	0%		01/02/2024	0%
FI		N/A	N/A	31/03/2024	N/A		01/03/2024	0%
FR		11/11/2022	100%	01/09/2023	0%		01/03/2024	0%
GR		30/04/2023	0%	31/01/2024	0%		31/03/2024	0%
HR		N/A	Not Provided	29/02/2024	Not Provided		29/02/2024	Not Provided
HU	30/06/2022	01/12/2022	100%	31/03/2024	Not Provided	01/03/2024	31/03/2024	25%
IE		N/A	N/A	N/A	N/A		01/01/2024	N/A
IT		Not Provided	100%	Not Provided	0%		01/03/2024	0%
LT		31/03/2022	N/A	28/02/2024	N/A		01/03/2024	N/A
LU		Not Provided	Not Provided	Not Provided	Not Provided		Not Provided	31/02/2024
LV		Not Provided	Not Provided	Not Provided	Not Provided		Not Provided	Not Provided
MT		01/02/2023	50%	31/05/2023	N/A		01/10/2023	0%
NL		N/A	N/A	01/03/2024	0%		01/03/2024	0%
PL		01/12/2022	25%	29/12/2023	0%		15/01/2024	0%
PT		01/06/2023	0%	01/12/2023	0%		29/02/2024	0%
RO		Not Provided	Not Provided	Not Provided	Not Provided		01/03/2024	Not Provided
SE		N/A	N/A	Not Provided	0%		01/03/2024	0%
SI		01/01/2022	100%	20/02/2024	0%		01/03/2024	0%
SK		Not Provided	0%	Not Provided	0%		Not Provided	0%

Table 31: Comparison of Planned and Actual Dates – PoUS – Phase 1

<sup>40</sup> The figure related to Conformance Testing includes the work from the Commission in regards to the preparation of the CT environment and coordination for Member States.



Respondee	Technical Specifications			Conformance Testing		Deployment		
	Target date from WP	2022 Planned/ Actual End Date	2022 % of Completion	2022 Planned/ Actual End Date	2022 % of Completion	Target date from WP	2022 Planned/ Actual Date	2022 % of Completion
European Commission	30/06/2022	30/06/2023	30%	30/06/2025	0%	02/06/2025	15/08/2025	0%
AT		N/A	Not Provided	N/A	Not Provided		N/A	Not Provided
BE		Not Provided	Not Provided	01/03/2025	Not Provided		01/03/2025	Not Provided
BG		20/12/2023	0%	30/05/2025	0%		02/06/2025	0%
CY		N/A	0%	19/05/2025	0%		02/06/2025	0%
CZ		01/04/2023	0%	02/06/2025	0%		02/06/2025	0%
DE		N/A	N/A	N/A	N/A		N/A	N/A
DK		15/03/2020	0%	30/06/2025	0%		30/09/2024	0%
EE		N/A	0%	N/A	0%		02/06/2025	0%
ES		30/03/2024	0%	02/06/2025	0%		02/06/2025	0%
FI		N/A	Not Provided	Not Provided	N/A		30/06/2025	0%
FR		31/05/2024	0%	28/02/2025	0%		02/06/2025	0%
GR		31/08/2024	0%	31/05/2025	0%		30/06/2025	0%
HR		N/A	Not Provided	01/06/2025	Not Provided		31/05/2025	Not Provided
HU		30/09/2024	0%	01/06/2025	0%		01/06/2025	0%
IE		N/A	Not Provided	N/A	N/A		01/01/2025	N/A
IT		Not Provided	0%	Not Provided	0%		02/06/2025	0%
LT		30/06/2023	N/A	31/05/2025	N/A		02/06/2025	N/A
LU		Not Provided	Not Provided	Not Provided	Not Provided		31/03/2025	Not Provided
LV		Not Provided	Not Provided	Not Provided	Not Provided		Not Provided	Not Provided
MT		01/01/2024	0%	31/05/2024	N/A		01/10/2024	0%
NL		01/07/2023	0%	01/06/2025	0%		02/06/2025	0%
PL		01/12/2022	0%	29/12/2023	0%		15/01/2024	0%
PT		01/06/2024	0%	01/03/2025	0%		01/06/2025	0%
RO		Not Provided	Not Provided	Not Provided	Not Provided		02/06/2025	Not Provided
SE		N/A	Not Provided	Not Provided	0%		02/06/2025	0%
SI		01/03/2023	0%	30/05/2025	0%		02/06/2025	0%
SK		Not Provided	0%	Not Provided	0%		Not Provided	0%

Table 32: Comparison of Planned and Actual Dates – PoUS – Phase 2

Regarding **PoUS-Phase 1**, additional details regarding the specific percentage of completion per milestone can be seen in Figure 21.

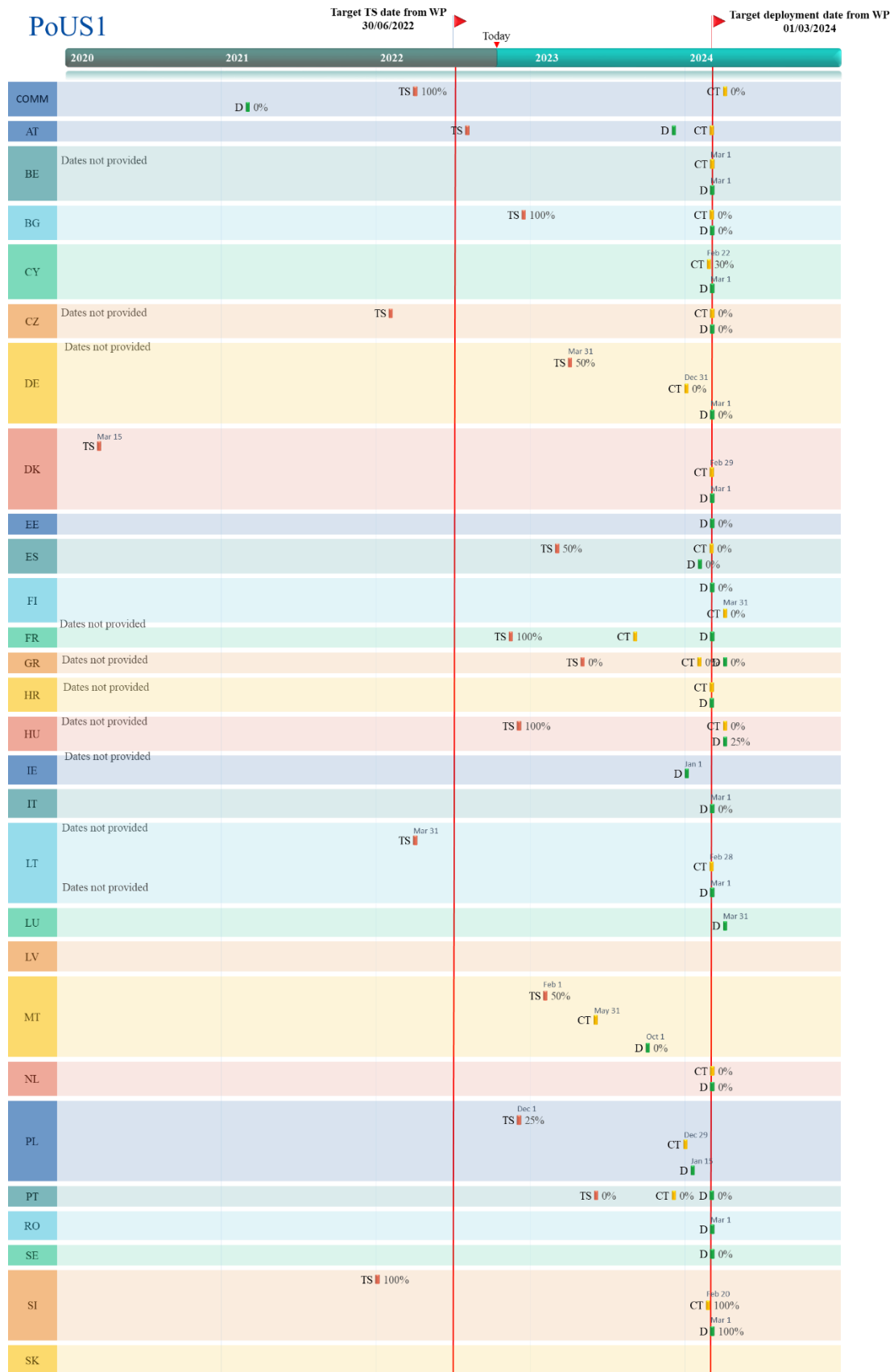


Figure 21: Percentage of Completion per Phase – PoUS – Phase 1

Regarding **PoUS–Phase 2**, additional details regarding the specific percentage of completion per milestone can be seen in Figure 22.

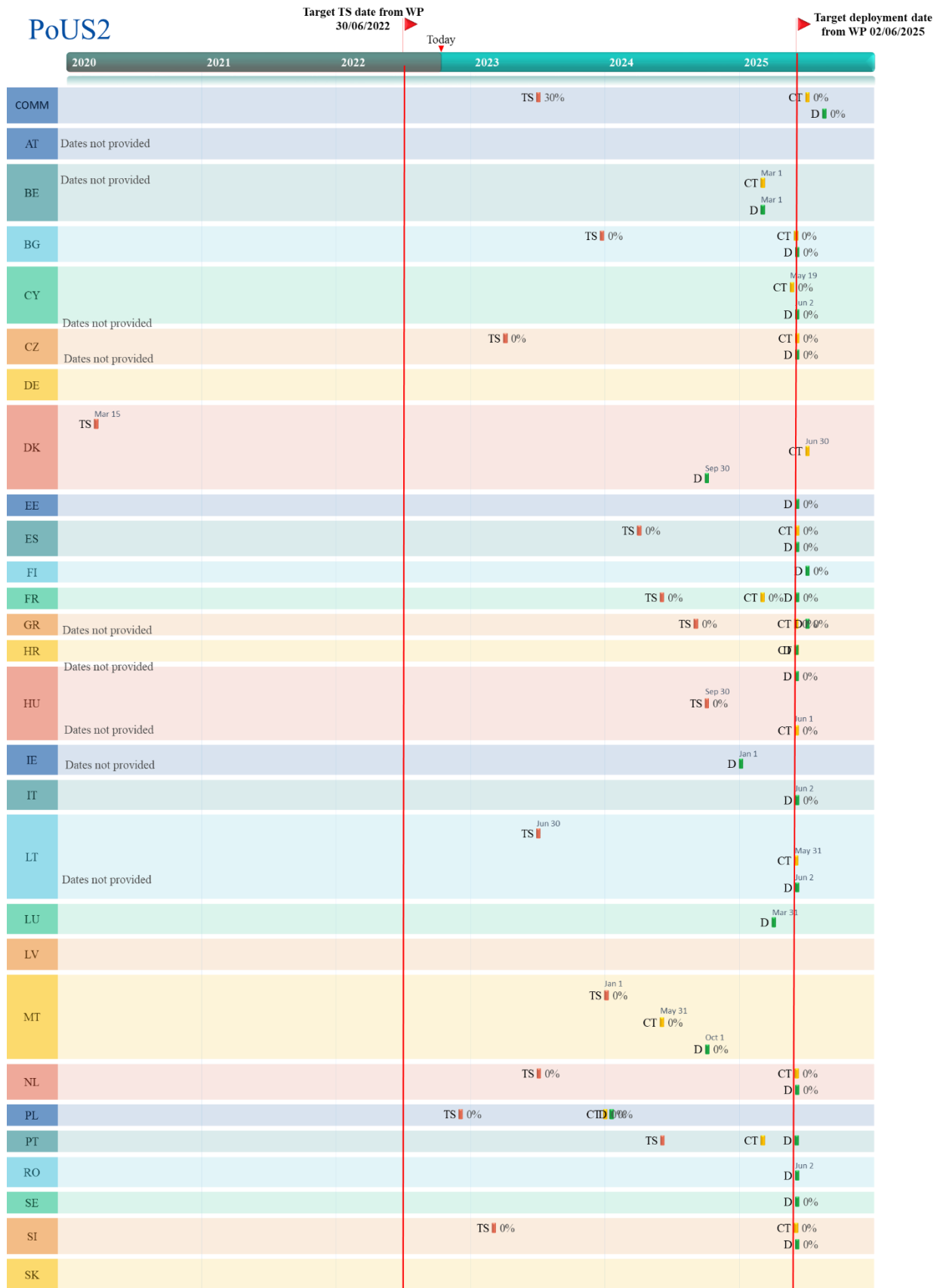


Figure 22: Percentage of Completion per Phase – PoUS – Phase 2

## 4.5 UCC CENTRALISED CLEARANCE FOR IMPORT (CCI)

The UCC Centralised Clearance for Import (CCI) project aims to allow for goods to be placed under a customs procedure using centralised clearance, enabling economic operators to centralise their business from a customs point of view. The processing of the customs declaration and the physical release of the goods will be coordinated between the related customs offices.

The implementation of the concept of Centralised Clearance for Import by a new trans-European System will strengthen the trade facilitation by enabling economic operators with the “centralisation” of their business related to import and the reduction of the interactions with customs by using the customs office of supervision as the main contact partner. In addition, the new CCI system will introduce harmonisation and standardisation of processes and electronic exchange of information across the Union for centralised clearance at import. It is also expected to reduce the administrative burden for the customs administration with automated processes and to allow tax authorities to have better supervision and control on the collection of import VAT.

In terms of the planning approach, as a trans-European system, the project contains components developed centrally and nationally. The project will be implemented in two phases.

**Phase 1** will cover the combination of centralised clearance with standard customs declarations and with simplified customs declarations and related supplementary declarations (which regularise simplified customs declarations). In addition, this phase will cover the placing of goods under the following customs procedures: release for free circulation, customs warehousing, inward processing and end-use. In regards to the types of goods involved, this phase will cover all types of goods with the exception of excise goods and goods subject to common agricultural policy measures.

**Phase 2** will cover what is not covered by Phase 1, namely:

- The combination of centralised clearance with customs declarations through an entry in the declarant’s records and related supplementary declarations, including the recapitulative one;
- Supplementary declarations regularising more than one simplified customs declaration;
- The placing of goods under the temporary admission procedure;
- Goods subject to common agricultural policy measures and excise goods;
- Goods in the context of trade with special fiscal territories;
- The communication of supporting/additional documents between the related customs offices.

### 4.1.9 Summary of Responses

#### *CCI – Phase 1*

##### **Summary from the Commission:**

CCI is the first trans-European system using the new network architecture, CCN2ng. All of the other projects supporting conformance testing activities need to be aligned with the new architecture and approach.

“Forerunner” Member States have been identified to work closely with the Commission for the development activities and with a view to start operations soon after the start of the deployment window planned for the project in the UCC Work Programme<sup>41</sup>.

As of January 2022 pre-Conformance Testing activities have started with “forerunner” Member States<sup>42</sup>, having Conformance Testing planned for 13/10/2022 - 01/12/2022.

The conformance environment was outlined on TAXUD’s side. It is envisaged that ES finishes their testing activities before December 2022. Their target is to execute tests in the summer and go live in October 2022. Several NAs reported risks and challenges to go live before the legal deadline of

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<sup>41</sup> The deployment window set by the UCC WP is 01/03/2022 – 01/12/2023;

<sup>42</sup> In January 2022, ES as a forerunner started national pre – conformance test activities. A technical meeting with MSs was held on 16/12/2021 for presenting and discussing the MS CCI P1 NPPs. The communication between Member States and DG TAXUD will continue to follow up on their progress.

1/12/2023. In this light, DG TAXUD support for the conformance testing activities will need to be extended.

It needs to be highlighted that CCI messages are fully aligned to the new Annex B and the ones applicable to the external domain with the Traders can be re-used by those MSs who decided to start updating their NIS in accordance with new Annex B, instead of Annex D to the UCC DA and Annex C to the UCC IA.

### Summary from the Member States:

Most Member States are analysing the technical and functional specifications and some have cited that there may be a risk in meeting the CT and deployment milestones. Many Member States have commented that the planning is tight in the context of import systems. In addition to the complexity of the project, other reasons for potential delay are human and financial resource constraints, impact and re-planning due to the VAT eCommerce package<sup>43</sup> and also the specific working circumstances caused by the COVID-19 pandemic.

In terms of assessing the level of completeness of the system, three quarters of the Member States that provided information reported that the system is on target. However there are several Member States that have indicated that at the current stage the system is delayed beyond the deployment deadline<sup>44</sup>.

BG, EE, ES, HR, IE, IT, NL and PL mentioned that technical specifications have been completed. ES, HU and PL have initiated the Conformance Testing activities. Only ES has reported to have completed the development of CCI Phase 1.

Regarding the associated risk level on the on-time delivery of the project the majority of the Member States have indicated mostly a medium to high level of risk, and also assessed the complexity as being medium to high.

### Detailed Responses:

Table 33 provides the individual Member States' responses to the survey:

MS	Complexity Rating	Risk Level	Additional Comments
AT			
BE			
BG	6	Low	BG is implementing IT projects using the TOGAF/ADM and RUP methodologies. According to BG planning for CCI – Phase 1, they intend to start development in 2022 and to go live in November 2023.
CY	6	Low	CY mentioned that from their perspective it is unlikely that traders in CY will be involved in centralised clearance operations, however they are making the necessary preparations to introduce it. The Technical Specifications were published on 15/05/2022 with Conformance Testing planned for October/November 2023 and Operations on 01/12/2023. For Phase 2 it is intended for Technical Specifications to be available on 30/11/2024, Conformance Testing taking place in May 2025 and Operations on 02/06/2025.
CZ	6	Med	CZ presented that for CCI Phase 1 there were some activities that have already started and that deployment would take place on 01/12/2023 while for Phase 2 it would deploy on 01/02/2025.
DE	5	High	DE explained that the project will be implemented as part of the major release of the national IT-System ATLAS (Release 10.2) as a new trans-European system, therefore delays on delivery are expected. The creation of a new national PG for CCI with the necessary resources and the

<sup>43</sup> Council Implementing Regulation (EU) 2017/2459 of 5 December 2017 (OJ L 348, 29.12.2017, p. 32–33);

<sup>44</sup> DE, GR, FI, FR, NL, SI and SK.

MS	Complexity Rating	Risk Level	Additional Comments
			<p>application of an agile implementation development method are considered to reduce the impact on planning.</p> <p>Internal analysis has already started with the aim to start operation in Q4 2024. Once CCI is deployed, it will be upgraded to fully integrate the national import requirements and to replace the “old” system.</p> <p>DE explained that the Annex B (DA) requirements are being implemented in the existing national import systems so the deadline of 31/12/2022 can be achieved. However for CCI it will be necessary to develop a completely new system.</p>
DK	4	High	DK informed that at the moment the system is undergoing planning.
EE	5	Med	Currently the system is in analysis phase, development activities having not yet started. EE plans to deploy the system in December 2023.
ES	6	High	<p>ES explained that the first implementation targets SCI functionality with no Simplified declaration, using an iterative development approach. The final delivery of the project will require planning coordination with at least another Member State.</p> <p>ES’s plan has been adapted to the availability of the Technical Specifications for the Trans-European Systems (TES), with the need of further adjustments on the system availability in the partner country.</p> <p>The project has suffered delays in relation to the publication of the specifications due to the complexity of the system that has affected the national planning, considering the high interrelationship between national and European declaration systems.</p>
FI	6	High	<p>FI informed that the entire import system will be built from scratch and noted that given the many parallel projects, the COVID-19 pandemic, the limited resources, especially on suppliers side and the high level of workload the delivery of CCI - Phase 1 will be postponed by two quarters, therefore a derogation will be needed, possibly until Q2 2024.</p> <p>At the same time it was indicated that the supplier uses an agile method for the system development in order to reduce impact on milestones, however deliveries are to be tested in Finnish Customs and further sent in bigger entities.</p>
FR	5	High	<p>Regarding CCI, FR had to abandon the plan to be ‘forerunner’ as it was needed to prioritise its developments to be ready with the new import system. Additional resources on business and IT side were mobilized in this regard. FR explained that from a technical point of view there is no added value in delivering the application in several batches, having links with internal repositories and internal processes that must be developed from start to finish.</p> <p>Delays have been recorded given the involvement of the technical team in Brexit and E-commerce, with a strong impact on human and financial resources, idea strengthened by the COVID-19 pandemic. As regards the mitigating measures, FR outsourced some activities with a contractor and in parallel, they secured the import system to have a better base for CCI.</p> <p>At the same time AES developments have to be ensured, given France's position as an "exit" Member State for the other Member States. Therefore, it was expressed that many choices that require an increased level of resources are to be made for several projects that have to be carried out simultaneously. In this light, FR has chosen to prioritize AES (core functions) over CCI given the importance of the export volumes. Ultimately, the calendar was shifted in order to secure other projects: the</p>

MS	Complexity Rating	Risk Level	Additional Comments
			CCI – Phase 1 system will deliver the functionalities by iterations, having an envisaged deployment date set for October 2024.
GR	6	High	Same response as for PoUS – Phase 2.
HR	6	Med	Currently functionalities are developed, HR expressing that the system is expected to be highly complex. HR indicated that the deadline will be met, however they will be under some pressure given that the centralised clearance is linked to the timelines of AES and National Import systems.
HU	5	Med	According to HU the connectivity to the data link developments will be completed on 30/04/2023. Full functionality will be finished on 01/12/2023.
IE	6	Med	IE highlighted that communication with other MSs is new at Import, plus the move to the revised Annex B and the data changes to EUCDM V6.1 are challenges for EOs and Customs Authorities, therefore the effective delivery of the project could be impacted. The planning for go-live in October 2023 was confirmed by IE and they hope to have all traders on board.
IT	4	Med	In relation to CCI - Phase 1, IT has started development in June 2022 with conformance testing planned from May to October 2023 and deployment on 06/11/2023. Work on Phase 2 will start when Phase 1 is done.
LT			For CCI Phase 1, the testing is to be finished in September 2023 and the deployment is planned to be within the legal deadline, therefore no risks are foreseen for the moment for the CCI project.
LU			According to LU, CCI Phase 1 was also affected by the tendering process, however at the moment it is still possible to meet the 01/12/2023 deadline. If not, the new envisaged deadline will be 30/06/2024.
LV	6	High	LV marked the project as delayed, however overall the delivery is still foreseen within the Deployment deadline. A primary cause identified is the lack of readiness related to procurement procedure. At the same time, CCI depends on the new import system being implemented in the last quarter of 2023. A possible rollout of changes in stages with the national import and then CCI, rather than both simultaneously is to be examined. Other risks associated with financing were identified.
MT	6	Med	The CCI Phase 1 system will be developed and implemented under the National Import System, which will be deployed around Q1/Q2 2023, instead of Q4 2022. Trader involvement is not envisaged given the nature of it and their location.
NL	5	High	For CCI, NL is considering to merge Phase 1 and Phase 2 and they intend to combine them with CCE. The deadline would then be the deadline of CCI Phase 2. NL has associated to this project a high risk on the on-time delivery of the project given the intricacies of this project. To this is added Brexit, e-commerce, the labour market and the COVID-19 pandemic. At the same time, NL has indicated that in order to reduce the impact on milestones, the minisation of the scope is under consideration. At the time of writing, all milestones (Construction phase, Conformance Testing and Deployment) are being delayed.
PL	5	Med	PL noted that the CCI Phase 1 system will be developed and implemented under the National Import System, having the implementation planned for 01/12/2023. Risks pertaining to the COVID-19 pandemic and its impact to financial and human resources are being associated with a possible

MS	Complexity Rating	Risk Level	Additional Comments
			delay on the system delivery. The specifications for Phase 1 will be published in June 2022. No major risks for delay are being envisaged for both Phase 1 and 2.
PT	6	Low	An agile development approach is being used.
RO			For CCI Phase 1, RO mentioned that this is part of the same contract as national import, therefore at the current stage they are still waiting on contractor planning.
SE	4	Med	SE explained that due to several projects that should be developed at the same time, the deployment deadline of the CCI – Phase 1 system could be altered. At the time of writing, SE is placed in the analysis phase, having yet to consider the approach for the project development. The deployment is planned for December 2023, but there are risks associated. For Phase 2, they currently plan for June 2025 as in the UCC WP.
SI	6	High	SI indicated that for the moment they cannot anticipate delays. The status of the project will be assessed once they receive the offer from the external IT contractor regarding the development of the CCI phase 1 project. Previously SI completed the national import declaration system in accordance with the new Annex B requirements, which had to be postponed several times due to the unpreparedness of the external environment as a consequence of COVID-19. The deployment is being maintained for 01/12/2023.
SK	1	High	SK noted that due to lack of financial and human resources, all milestones related to the system development are impacted, leading to possible delays on the on-time delivery of the project. However, the implementation is planned to be with entry/import system in the same contract, therefore aiming to achieve CCI - Phase 1 date.

Table 33: Detailed responses from Member States – CCI – Phase 1



Figure 23 provides the percentage of respondents (Member States plus the European Commission) in each development phase<sup>45</sup>.

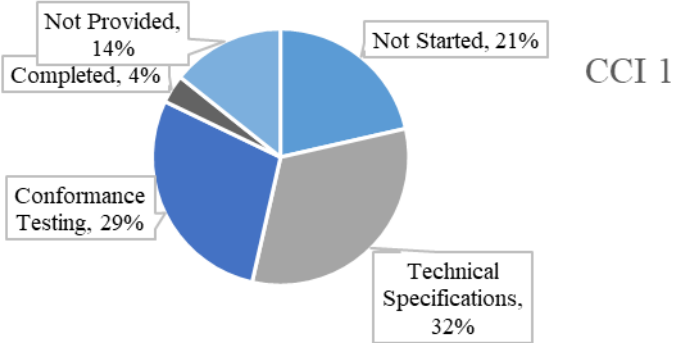


Figure 23: Summary of Survey Responses – CCI – Phase 1

<sup>45</sup> The figure related to Conformance Testing includes the work from the Commission in regards to the preparation of the CT environment and coordination for Member States.

## CCI – Phase 2

### Summary from the Commission:

Representatives of 10 Member States<sup>46</sup> have been actively involved in the CCI Phase 2 project group, identifying and developing proposals for the processes and the new functionalities to be implemented. The business processes and functional specifications for Phase 2 were approved during 2020 and the technical specification document was approved in June 2022 in view of the planned date for starting the deployment window for the initial Member States in October 2023.

### Summary from the Member States:

Most Member States are analysing the technical and functional specifications and some have cited that there may be a risk in meeting the CT and deployment milestones. Many Member States have commented that the planning is tight in the context of import systems. In addition to the complexity of the project, other reasons for potential delay are given such as human and financial resource constraints, impact and re-planning due to the VAT eCommerce package<sup>47</sup> and also the specific working circumstances caused by the COVID-19 pandemic.

In terms of assessing the level of completeness of the system, three quarters of the Member States that provided information reported that the system is on target. No Member States have yet completed the development of the system, however there are numerous Member States that have indicated that at the current stage the system is delayed beyond the Deployment deadline<sup>48</sup>. EE and FI explained that in their case, the system is delayed, beyond the Deployment deadline.

Several Member States have indicated that activities were initiated in relation to Technical Specifications, with the exception of BG, ES, IT and NL.

Regarding the associated risk level on the on-time delivery of the project the majority of the Member States have indicated a medium, high level of risk, while assessing the complexity as being medium/high.

### Detailed Responses:

Table 34 provides the individual Member States' responses to the survey:

MS	Complexity Rating	Risk Level	Additional Comments
AT			
BE			
BG	5	Low	BG is implementing IT projects using the TOGAF/ADM and RUP methodologies.
CY	6	Low	No activities are planned until the end of 2022 for CCI Phase 2.
CZ	6	Med	The system is developed under NIS, for further details please see section referring to NIS. Indicative milestones in national project plan are as follows: Technical Specifications = 01/06/2024, The period of CT with EOs = 01/10/2024-31/01/2025, Deployment = 01/02/2025.
DE	3	Med	In DE's perspective, CCI – Phase 2 is considered a business upgrade only for which no complex and time-consuming migration strategy from CCI – Phase 1 is required. Implementation of CCI – Phase 2 highly depends on the finalisation of CCI – Phase 1 for which delays have been identified, but mitigation measures are taken to ensure operation starts in Q4 2024. Following this it is appreciated to be possible to compensate the delay for CCI – Phase 2 in order to meet the legal end-date of the deployment window 02/06/2025.

<sup>46</sup> AT, BE, CZ, DE, DK, ES, FI, FR, NL and PT;

<sup>47</sup> [Council Implementing Regulation \(EU\) 2017/2459 of 5 December 2017](#) (OJ L 348, 29.12.2017, p. 32–33);

<sup>48</sup> SI and SK.

MS	Complexity Rating	Risk Level	Additional Comments
			The creation of a new national PG for CCI with the necessary resources and the application of an agile implementation development method are considered to reduce the impact on planning.
DK	4	Med	The project is currently undergoing planning.
EE	5	Med	No activities related to the project development have started. There is a high risk identified for the system outcome, considering the existing lack of human and financial resources.
ES	6	High	CCI – Phase 2 depends on the success of Phase 1, furthermore this may help reducing the complexity of the second phase. An iterative approach is envisaged for the system development.
FI	6	High	FI informed that the entire import system will be rebuilt.
FR	5	Med	Same response as for CCI – Phase 1. FR added that currently their activities are focused on the applications for the NIS and CCI projects, with Conformance Testing activities to be completed after the NIS is finalised. At the same time, AES constraints are generating delays as well. Technical Specifications and Conformance Testing are expected to be impacted.
GR	5	Low	Same response as for CCI – Phase 1.
HR	6	Med	Same response as for CCI – Phase 1.
HU	4	Low	According to HU, Phase 2 planning is on target.
IE	5	Low	Following Phase 1, Phase 2 incorporates additional procedures, full engagement with Economic Operators being required.
IT	4	Med	Same response as for CCI – Phase 1.
LT			
LU			According to LU, CCI Phase 2 should be ok by the UCC WP date as it is a separate deliverable.
LV	6	Med	CCI – Phase 2 will be a part of totally new national import system, as the old system cannot be modified. This associates a medium risk of delay to the project.
MT	5	Low	None.
NL	5	Low	According to NL a high level of risk is being associated to the on-time delivery of the project given the new application and its interactions with many other (national) applications. Furthermore many MASP-projects developments are occurring at the same time, influencing each other, creating interdependencies and ultimately increasing the complexity. To minimise the impact on delivery, NL is using an agile approach.
PL	5	Med	Same response as for CCI – Phase 1.
PT	6	Low	PT emphasized that the Conformance Testing’s purpose is for the Economic Operators to be able to realize if their systems comply with the specifications and for PT to assess if the external domain was correctly developed. The Conformance Testing with the Member States will be completed in order to evaluate if all the necessary connections/validations are correctly performed. This Phase 2 is intended to treat all the matters which were omitted in Phase 1 due their complexity. The project will be developed and implemented as part of the National Import System. Therefore, since this project is highly complex, the integration of CCI – Phase 2 will also be complex. To this adds that the development of this system is not only related with the system itself, but it is also related to the development of all national, central and other MS’s systems/modules, national and UE

MS	Complexity Rating	Risk Level	Additional Comments
			entities connections, which ultimately increases the inter-dependencies and the complexity of the “global system”. An agile development approach will be used to reduce implementation timeframe.
RO			
SE	4	Med	Same response as for CCI – Phase 1.
SI	6	High	SI noted that the start of CCI - Phase 2, depends on the finalisation of the first phase. CCI is appreciated as a complex system which includes 47 electronic messages and 15 BPMs, exchange of electronic messages between SCO and PCO, specific rules and conditions (R&C) for CCI, specific code lists for CCI and demanding Conformance Testing. SI indicated that for the moment they cannot anticipate delays. The status of the project will be assessed once they receive the offer from the external IT contractor regarding the development of the CCI phase 2 project (dependant on completion of Phase 1). Previously SI completed the national import declaration system in accordance with the new Annex B requirements, which had to be postponed several times due to the unpreparedness of the external environment as a consequence of COVID-19.
SK	1	High	Same response as for CCI – Phase 1.

Table 34: Detailed responses from Member States – CCI – Phase 2

Figure 24 provides the percentage of respondents (Member States plus the European Commission) in each development phase<sup>49</sup>.

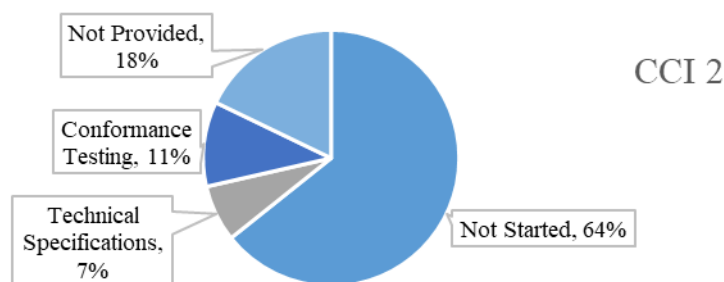


Figure 24: Summary of Survey Responses – CCI – Phase 2

<sup>49</sup> The figure related to Conformance Testing includes the work from the Commission in regards to the preparation of the CT environment and coordination for Member States.

#### 4.1.10 Overview of Project Progress

Table 35 and Table 36 highlight any known divergences in the planning compared to the dates set in the Work Programme. As this project has a deployment window, the ‘Deployment’ and ‘Operations’ columns are shown. If there is a difference in these two dates, this implies that a migration period is planned.

Regarding **CCI – Phase 1**, the following Member States have a planned operations date that is later than the deadline in the UCC Work Programme: DE, FI, FR and GR. DK did not provide data.

Respondee	Technical Specifications			Conformance Testing		Deployment (Start of the deployment window)			Operations (End of the deployment window)	
	Target date from WP	2022 Planned/ Actual End Date	2022 % of Completion	2022 Planned/ Actual End Date	2022 % of Completion	Target date from WP	2022 Planned/ Actual Date	2022 % of Completion	Target date from WP	2022 Planned/ Actual Date
European Commission		09/10/2020	100%	Not Provided	5%		Not Provided	5%		Not Provided
AT		01/12/2021	Not provided	Not provided	Not provided		Not provided	Not provided		Not provided
BE		01/12/2021	Not provided	01/12/2023	Not provided		01/12/2023	0%		01/12/2023
BG		27/08/2021	100%	15/10/2023	0%		31/10/2023	Not provided		31/10/2023
CY		15/05/2022	80%	15/11/2023	0%		01/12/2023	0%		01/12/2023
CZ		31/03/2023	25%	30/11/2023	0%		01/12/2023	0%		01/12/2023
DE		31/03/2024	0%	30/06/2025	0%		31/12/2024	0%		31/12/2024
DK		Not provided	5%	Not Provided	0%		Not Provided	0%		Not Provided
EE		01/12/2022	100%	30/10/2023	0%		29/11/2023	0%		29/11/2023
ES		14/03/2022	100%	Not provided	100%		30/09/2022	100%		Not provided
FI		31/12/2022	60%	31/03/2024	0%		30/06/2024	10%		30/06/2024
FR		01/02/2022	30%	05/2023	0%		01/06/2022	0%		01/11/2024
GR		Not provided	30%	30/09/2022	0%		31/12/2022	0%		01/12/2024
HR	30/09/2020	30/06/2022	100%	30/11/2023	0%	01/03/2022	01/12/2023	20%	01/12/2023	01/12/2023
HU		15/03/2023	50%	01/12/2023	10%		01/12/2023	0%		01/12/2023
IE		01/10/2022	100%	30/09/2023	0%		01/10/2023	0%		01/10/2023
IT		01/10/2020	100%	30/09/2023	0%		01/03/2022	0%		01/12/2023
LT		04/05/2023	Not provided	01/12/2023	Not provided		01/12/2023	Not provided		01/12/2023
LU		01/02/2023	Not provided	30/06/2024	Not provided		30/06/2024	Not provided		30/06/2024
LV		01/10/2022	N/A	29/10/2023	0%		30/10/2023	0%		30/10/2023
MT		31/08/2022	80%	31/10/2023	0%		15/11/2023	50%		15/11/2023
NL		01/01/2022	100%	01/12/2023	0%		01/12/2023	0%		01/11/2025
PL		30/07/2022	100%	30/09/2023	10%		01/12/2023	10%		01/12/2023
PT		15/12/2022	75%	15/10/2023	0%		01/12/2023	0%		01/12/2023
RO		30/06/2023	Not provided	31/12/2023	Not provided		01/12/2023	Not provided		Not provided
SE		Not provided	0%	Not provided	0%		01/12/2023	0%		Not provided
SI		01/03/2021	0%	20/11/2023	0%		01/12/2023	0%		01/12/2023
SK		01/12/2022	0%	01/11/2023	0%		01/12/2023	0%		Not provided

Table 35: Comparison of Planned and Actual Dates – CCI – Phase 1

For the implementation of CCI – Phase 2, FI’s planned deployment date is one month later than the target date set in the WP, considering that the entire import system will be rebuilt. EE reported a delay of one month as well.

Respondee	Technical Specifications			Conformance Testing		Deployment (Start of the deployment window)			Operations (End of the deployment window)	
	Target date from WP	2022 Planned/ Actual End Date	2022 % of Completion	2022 Planned/ Actual End Date	2022 % of Completion	Target date from WP	2022 Planned/ Actual Date	2022 % of Completion	Target date from WP	2022 Planned/ Actual Date
European Commission		Not provided	100%	Not provided	0%		Not provided	0%		Not provided
AT		Not provided	Not provided	Not provided	Not provided		Not provided	Not provided		Not provided
BE		N/A	Not provided	N/A	Not provided		N/A	Not provided		Not provided
BG		04/11/2024	100%	17/03/2025	0%		31/03/2025	0%		31/03/2025
CY		30/11/2024	0%	19/05/2025	0%		02/06/2025	0%		02/06/2025
CZ		01/06/2023	0%	31/01/2025	0%		01/02/2025	0%		01/02/2025
DE		31/03/2024	0%	30/06/2025	0%		31/12/2024	0%		31/12/2024
DK		Not provided	0%	Not provided	0%		Not provided	0%		Not provided
EE		31/03/2024	0%	31/12/2024	0%		30/06/2025	0%		30/06/2025
ES		30/09/2022	50%	30/09/2024	0%		01/10/2024	0%		01/04/2025
FI		31/12/2024	0%	30/06/2025	0%		30/06/2025	0%		30/06/2025
FR		31/03/2023	0%	31/12/2023	0%		30/06/2024	0%		30/06/2024
GR		31/12/2022	0%	31/12/2024	0%		31/03/2025	0%		31/03/2025
HR	30/06/2022	30/06/2023	0%	01/02/2025	0%	02/10/2023	01/03/2025	0%	02/06/2025	01/03/2025
HU		15/03/2023	0%	01/05/2025	0%		01/06/2025	0%		01/06/2025
IE		01/10/2023	0%	30/09/2024	0%		01/10/2024	0%		01/10/2024
IT		01/01/2023	100%	31/12/2024	0%		01/03/2025	0%		01/06/2025
LT		01/06/2024	Not provided	01/12/2024	Not provided		02/06/2025	Not provided		02/06/2025
LU		01/07/2023	Not provided	01/04/2025	Not provided		01/06/2025	Not provided		01/06/2025
LV		01/10/2024	0%	23/02/2025	0%		23/03/2025	0%		23/03/2025
MT		31/01/2023	0%	31/10/2023	0%		15/11/2023	0%		15/11/2023
NL		Not provided	50%	Not provided	0%		Not provided	0%		01/11/2025
PL		30/09/2023	0%	01/01/2025	0%		01/06/2025	0%		01/06/2025
PT		01/06/2024	0%	15/04/2025	0%		01/06/2025	0%		01/06/2025
RO		30/06/2024	Not provided	30/06/2025	Not provided		01/06/2025	Not provided		Not provided
SE		Not provided	0%	Not provided	0%		01/06/2025	0%		Not provided
SI		01/10/2023	0%	20/05/2025	0%		01/06/2025	0%		01/06/2025
SK		01/06/2024	0%	31/05/2025	0%		02/06/2025	0%		Not provided

Table 36: Comparison of Planned and Actual Dates – CCI – Phase 2

Additional details regarding the specific percentage of completion per milestone can be seen in Figure 25.

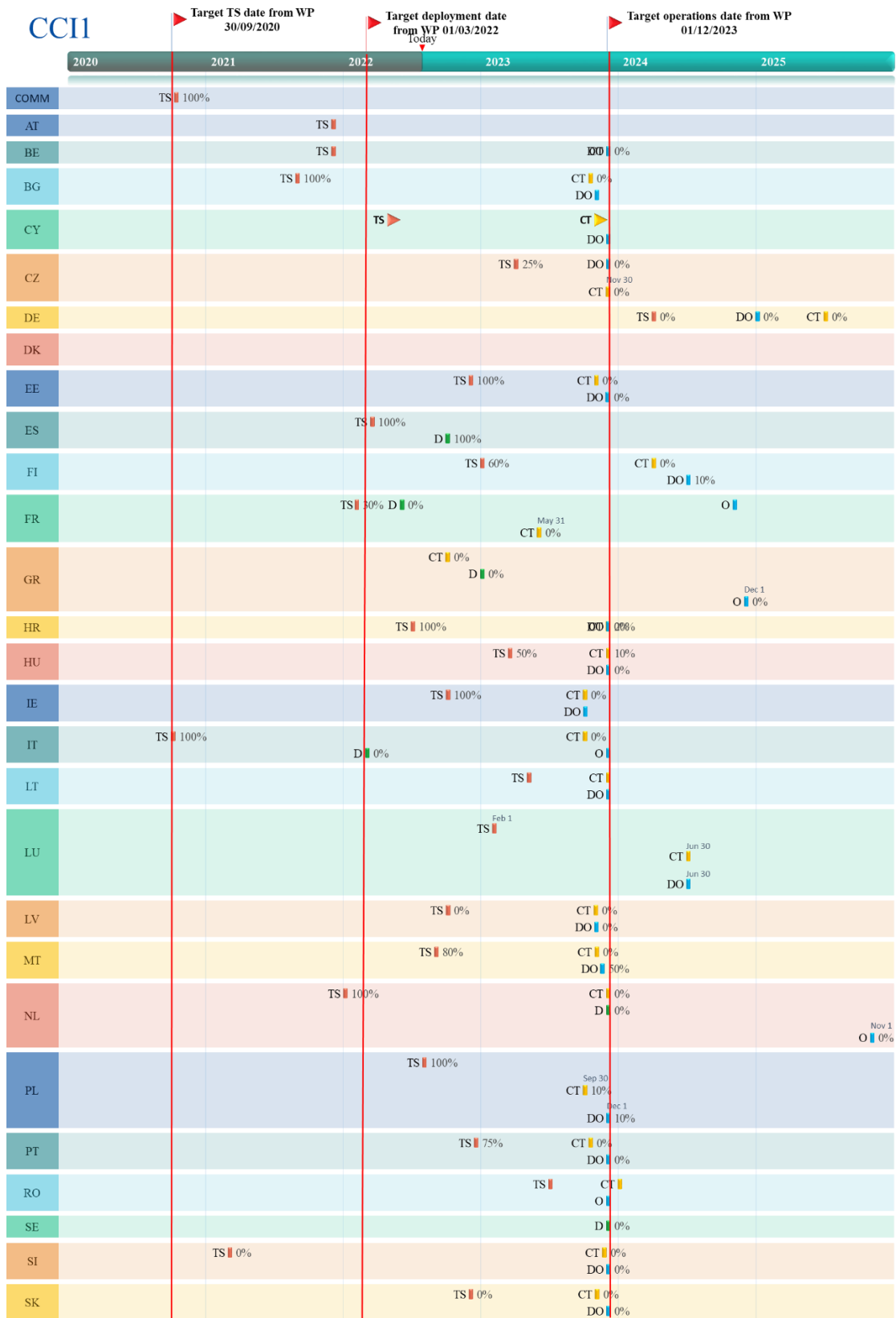


Figure 25: Percentage of Completion per Phase – CCI – Phase 1

Regarding **CCI – Phase 2**, additional details regarding the specific percentage of completion per milestone can be seen in Figure 26.

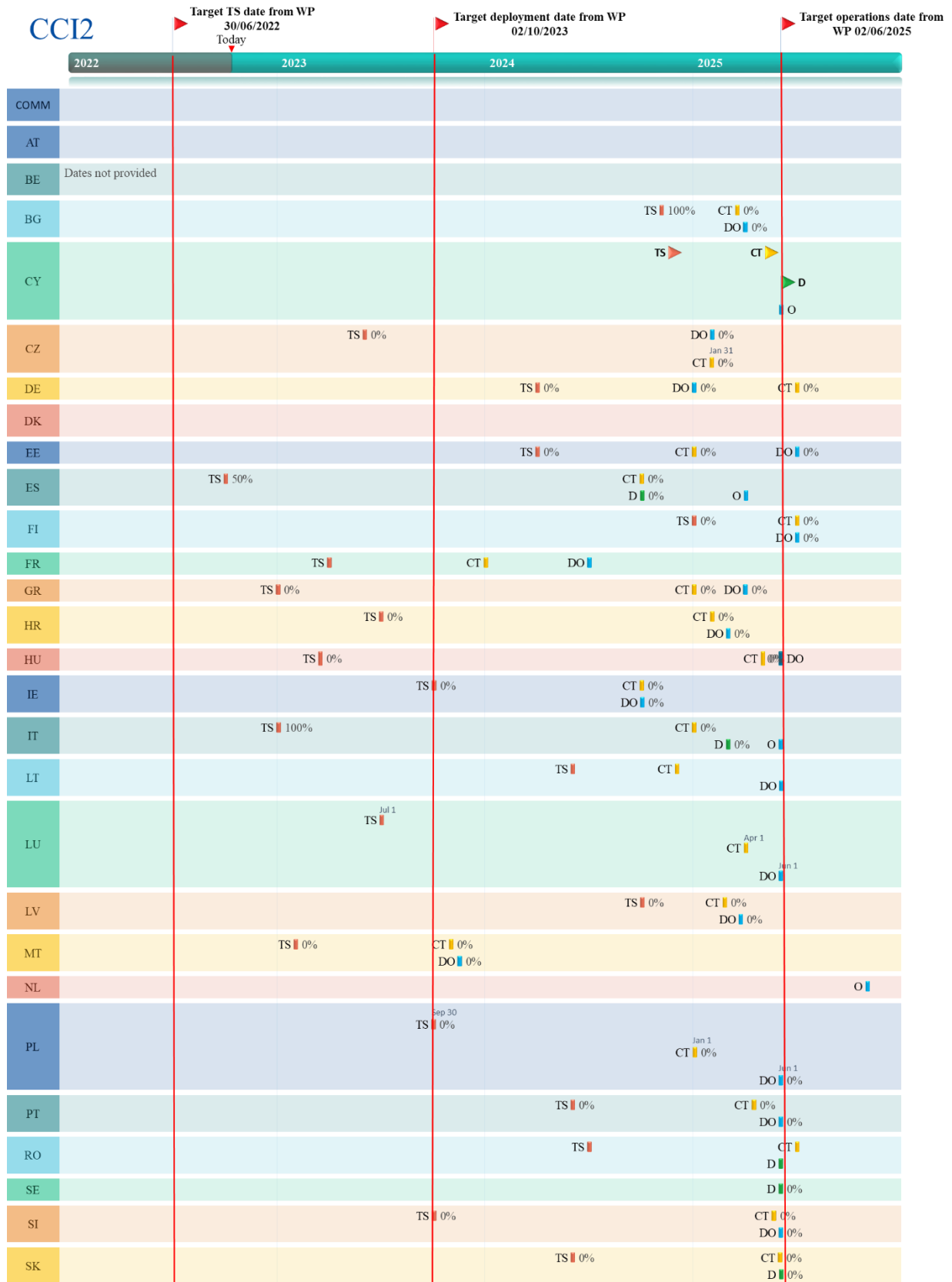


Figure 26: Percentage of Completion per Phase – CCI – Phase 2



#### **4.6 UCC NEW COMPUTERISED TRANSIT SYSTEM (NCTS) UPGRADE**

The aim of this project is to align the existing trans-European New Computerised Transit System (NCTS) to the UCC legal provisions. The scope of the project includes the alignment of information exchanges to UCC data requirements, the upgrade and development of interfaces with other systems such as AES in addition to new safety and security requirements.

In terms of the planning approach, the project is divided into two components.

Component 1, the “NCTS - Phase 5 (P5)” includes steps to upgrade and extend the current NCTS processes in alignment with UCC legal provisions, to introduce new processes such as the pre-lodgement of Customs declarations, to provide for the registration of “en-route” events, align information exchanges to UCC data requirements and the upgrade and development of interfaces with other systems. The system includes some components to be developed centrally, but the main components are to be developed at the national level.

NCTS – Phase 5 will meet the following objectives<sup>50</sup>:

- Data harmonisation across customs domains (import, export, transit) – New Customs EU Data Model;
- Harmonisation in the external domain resulting in trade facilitation;
- Interoperability across customs and taxation/excise;
- Alignment to operational practices for export and transit;
- Business continuity and facilitation of the transition for national administrations and Trade;
- New IT architecture for customs trans-European systems for Member States and Common Transit Convention (CTC) countries.

Additionally, NCTS – Phase 5 will improve the following processes:

- Transit guarantees monitoring;
- The enquiry process;
- Business statistics for transit: The current collection of business statistics will be optimised in order to ensure support of measurements of the Customs Union Performance system;
- Strengthen the safety and security for entry/exit.

Lastly, a number of new functionalities are being incorporated:

- Transit declaration pre-lodgement;
- Lodgement of transit declaration with reduced data-set;
- Management of “en route” incidents;
- Export process followed-up by the transit TES and better monitoring of trade flows.

Component 2, the “NCTS - Phase 6 (P6)”, will align NCTS to the new provisions set by the UCC regarding Advanced Cargo Information for Safety and Security, while continuing the practice of Combined Declaration for the MS opting to offer this facilitation to their trade. It requires the set-up of an automated interface between NCTS and ICS2 to ensure that trade and MS can serve both the transit procedure and the Safety and Security formalities simultaneously with a single process for the benefit of all. The time line of NCTS – Phase 6 is synchronised with the one of ICS2 Release 3, having a transition window from 3 June 2024 till 1st March 2025 for the Member States to migrate from NCTS-Phase 5 to NCTS – Phase 6.

It is important to highlight that the NCTS system specifications developed by the Commission (Functional System Specifications (FSS) and Technical System Specifications (TSS)) cover the information exchanges (IE) in the common, national, and external domains:

- The common domain communication refers to the information exchanges between customs offices located in different Member States.
- The national domain includes the interface between national NCTS and other systems at national level (e.g. AES-NCTS).

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<sup>50</sup> The same objectives will also be met by UCC Automated Export System (AES) – Component 1.

- Finally, the external domain includes the communications between the customs offices and the declarant/trader at exit, at national level.

Regarding the message exchanges on the common domain, the NCTS specifications prepared by DG TAXUD are mandatory for all the Member States. In case of external or national domain, the common NCTS specifications are strongly recommended, aiming to harmonize the export and exit formalities as much as possible among the EU Member States.

There are 36 National Administrations (NAs) currently in operation for NCTS: the 27 Member States, Northern Ireland under the terms of the NIP, and the other 9 CTC Countries (Andorra, Switzerland, Republic of Serbia, Republic of North Macedonia, Norway, San Marino, Turkey, Ukraine (since 1.10.2022), United Kingdom). There are also 3 acceding countries to the CTC Convention at various stage of preparation targeting a date of entry in operation: Montenegro for 01.06.2023, Georgia and Moldova targeting 2024.

**The following report addresses the progress and risks of the 27 Member States.**

On the basis of the information available at time of writing, Andorra, Switzerland, Republic of Serbia Norway and San Marino should be ready on time to enter the final provisions of NCTS by 01.12.2023. United Kingdom (and Northern Ireland) and Turkey are posing a risk for the business continuity of NCTS at this date because they opt for a “last day Big Bang” strategy while they are respectively #5 and #8 in the top countries in NCTS. Republic of North Macedonia announced that they will not be ready in time and asked for a derogation. Montenegro will be ready on time but does not present a risk for the business continuity of NCTS.

#### **4.1.11 Summary of Responses**

##### *NCTS – Component 1*

##### **Summary from the Commission:**

For NCTS – Phase 5, the challenge is to ensure business continuity and a smooth transition for Member States and trade while applying significant changes in the applicable Data and Process models. The Member States approved a new set of specifications which will rule the quality, technical support, business continuity, security and capacity of the future NCTS – Phase 5 operations (Service Management, Service Level Agreement, Terms of Reference, Crisis management, Capacity Plan, Security Plan). So far, no delays have materialised on the central components and the project is currently on track.

The Commission and the Member States are engaged in an important transition for the trans-European customs systems for export and transit, starting with the successful deployment of the new UCC NCTS-Phase 5 and UCC AES systems in DE in March 2021 and the successful entry in international operation of AES on 26 April 2022 by ES and DE. This opened the path to the next generation of interconnected trans-European systems for the trade community and the national customs authorities, demonstrating the quality of the Specifications and Legal provisions underpinning these two systems and most importantly their business continuity. The new export and transit systems offer significant benefits and enable simplifications while ensuring the business continuity with the systems in operation so far. This important milestone has been achieved thanks to the close collaboration between the Commission and the national customs and trade associations.

The NCTS - Phase 5 project pioneered a collaborative, iterative and agile working method that has been praised by all Member States and traders involved. The agile approach adopted since the start of the project pays off in terms of functional and technical quality and of actual progress of the MSs. The collective intelligence of the Member States is a critical asset for the success of the transition at stake.

##### Increasing progress of the Member States in 2022

The Member States have booked significant progress in the deployment of their national transit applications in 2022. 74% of the MSs are actively engaged in their implementation, while 70% of the Member States already published their trader specifications, 26% of the Member States are in the procurement or inception stage, and almost ready to start - see Figure 28 below.

The Member States have progressed in their specifications and developments, some through their Conformance Tests, other in their connectivity with the Central Services.

The % of completion of the transition is at 48%, up by 18% since end 2021.

Ramp up of the Conformance Tests in 2022 and entry in operation

23% of the MS have already started their Conformance Tests.

NCTS - Phase 5 is on track to start its international operation end 2022-early 2023 with DE, PL, IT, LU and SI.

Shift of the national project plans to 2023 and beyond

The plans of the Member States continue to drift closer to the deadline of the 01.12.2023 set by the UCC Work Programme.

The transition faces a delay equivalent to 3 quarters as the % of completion of the transition should be at 72% according to the 2020 plan.

All Member States but three re-confirm that they will be in operation before the 01.12.2023 deadline for the entry into the final provisions of the UCC as illustrated in Figure 27.<sup>51</sup> AT, LT and NL signalled their intention to enter in operation mid-2024.

DE is the leading Member State, having entered national operation in March 2021, as planned. A group of five Member States (DE, LU, PL, IT, SI) will be the first wave of Member States entering into international operations end 2022 early 2023. The transition will spread over five quarters.

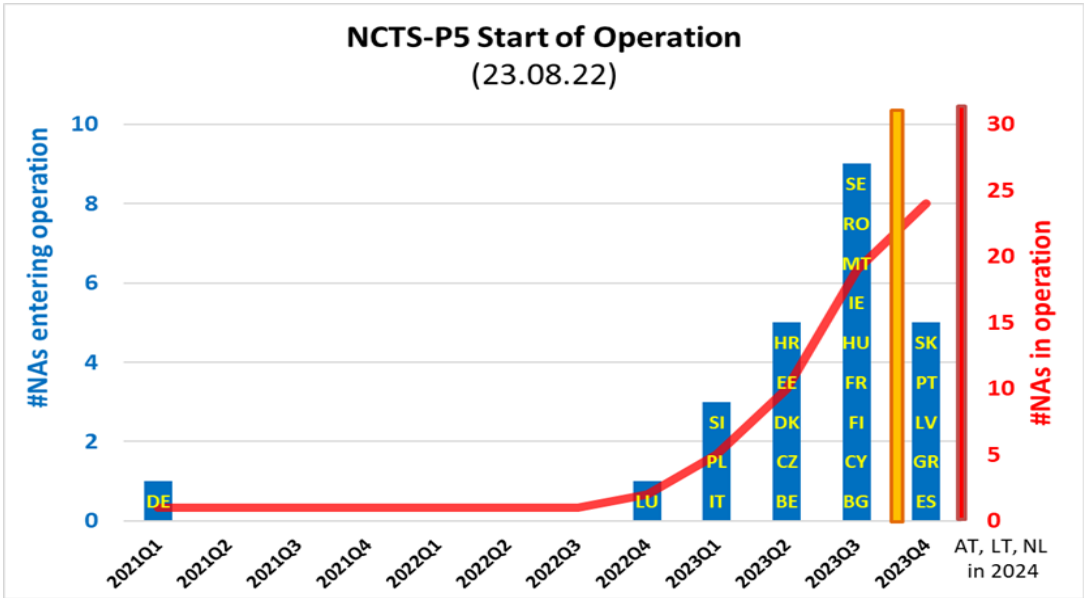


Figure 27: NCTS – P5 National Administrations entry into operations as of 23 August 2022

DG TAXUD assessed that 44% of the Member States’ plans pose challenges to the orderly and timely transition to the final provisions of the UCC by the 01.12.2023 and to the smooth transition of trade (Table 38 below).

<sup>51</sup> GR filed a request for derogation but has not modified its national project plan leading to entry in operation on the 01.12.2023.

The main incentives for the Member States to keep the necessary focus on NCTS – Phase 5 are the critical need for business continuity, the importance of Transit in a post Brexit EU, the early availability of the common technical specifications<sup>52</sup> and the awareness that the Return on Investment of each Member State and the value for Trade depend on the readiness of all other Member States.

#### Recommendations to the Member States

The Commission invited the Member States to take all mitigation actions to avoid delaying their readiness beyond the 01.12.2023 milestone set by the UCC Work programme.

The Member States at risk of missing the deadline or already signalling an entry in operation after 01.12.2023 should take advantage of the remaining 5 quarters before the deadline to speed up their implementation or to start working on their “plan-B” to secure their business continuity under the final provisions of the UCC.

The Commission invited the Member States that have not yet done it, to publish their trade specifications without any delay and by the 3<sup>rd</sup> quarter 2022 at the latest.

#### The Coordination programme

Under the umbrella of the “National Administration coordination programme”, the Commission assists and monitors the development and deployment of the national components for NCTS – Phase 5 by the Member States. 90%+ of the Member States submit regular updates to their national project plans.

The Trade community is kept regularly informed of the progress achieved and of the national project plans

#### **Summary from the Member States:**

NCTS – Phase 5 is regarded as a medium/high complex project due to the dependencies with other systems, high availability requirements and competing priorities. Despite this, the vast majority of Member States have reported to remain on-track for 01.12.2023, the entry into the final provisions of the UCC set in the UCC Work Programme.

Most Member States have reported a low/medium risk level on the on-time delivery of the project, with only a few of them rating it as high.

The main risks reported relate to:

- Delay in call for tender procedures, procurement and service providers;
- Competing priorities and inter-dependencies within and outside the UCC Work programme i.e. eCommerce and ICS2;
- Lack of resources (staff & budget);
- The COVID-19 pandemic;
- Transition;
- Delay from the traders;
- Changes in the specifications.

Many Member States have also informed that an agile development methodology was adopted in order to reduce the implementation timeframe.

In terms of assessing the level of completeness of the system, half of the Member States that provided information reported that the system is on target, with the other half stating that currently the development of the system is being delayed, but overall the deployment is still planned within the deadline. The % of Completion of each of the Member States’ projects according their respective national project plans is provided in Table 39 below.

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<sup>52</sup> NCTS-P5 is the only project along with AES-P1 which has had its common technical specifications approved 4 years before the date of entry in operation.

DE has been the first to deploy the system, having the end-date of the transition window for trader being shifted from end 2022 to June 2023 to allow maximum flexibility to migrate from NCTS-P4 to NCTS-P5.

A representative number of Member States have been either progressing or completing their Technical Specifications, with just a few Member States (BG, GR and SK) not yet initiating the activities. NL mentioned that according to their planning, the project is currently delayed beyond the Deployment deadline, with all milestones being impacted. However mitigating measures are planned: minimisation of the scope, while using an agile approach on development.

### Detailed Responses:

Table 37 provides the individual Member States' responses to the survey:

MS	Complexity Rating	Risk Level	Additional Comments
AT			
BE			
BG	4	Low	BG indicated that at the moment the Elaboration Phase is underway. By the end of the year it is expected that both the Elaboration Phase and the Construction Phase to be finished. AES and NCTS P5 are expected to have the implementation within the legal deadline.
CY	6	Low	The analysis, the preparation of specifications, part of the implementation and part of the conformance testing of the system will take place in 2022. The public procurement process has been concluded and the contract has been signed with the contractor. The project initiation document has been agreed and the relevant project plans and timelines for all the UCC systems have been updated and agreed.
CZ	6	Low	During Q1 of 2022 CZ has been testing the new system internally and correcting all the errors encountered. According to their National Project Plan a test environment for traders has been available since 01/03/2022 and since this date they will be testing the commercial software. Mode 1 of the Conformance Testing began in January 2022 and Mode 2 as of June 2022. Partial deployment approach with limited functionality is not used for the system development, having in place a plan for a “big bang” method. The Czech Republic will start operations in NCTS – Phase 5 on 03/04/2023. The transitional period for traders will not be used. Regular meetings with the contractor are taking place on a weekly basis, where the progress in development is being evaluated.
DE	6	Low	DE indicated that for NCTS – Phase 5 the Conformance Testing activities related to Mode 2 are completed and ready to start production. The following functionalities will be deployed until the end of 2022: (1) Update of the national interface Export followed by Transit; (2) Business Statistics (IE411C). DE is making use of an agile development approach in defined software release-cycles. The ongoing activities concern the finalisation and fine-tuning of NCTS – Phase 5, the monitoring of operations as well as the preparation of remaining Conformance Tests for new functionalities (Export followed by Transit; IE411c) and the start of the Conformance Testing (certification) of economic operators. As soon as the implementation of the UCC is completed, national work on the technical modernisation of the system is to be resumed (e.g. GUI modernisation; Change of Communications Protocols).

MS	Complexity Rating	Risk Level	Additional Comments
			The end-date of the transition window for trader has been shifted from end 2022 to June 2023 to allow maximum flexibility to migrate from NCTS-P4 to NCTS-P5.
DK	6	Med	<p>DK is building up a new IT Customs Platform for Import, Export and Transit (incl. GMS) and a new portfolio of IT Supporting Systems ex. Control systems, Manifest, Taric etc.</p> <p>Conformance Testing with Economic Operators has not yet been decided, the delay being related to the connectivity setup and to the fact that releases of ERMIS have not yet been received.</p> <p>As a mitigating measure DK is developing a temporary CCN adapter in house, however, the delivery is being delayed because of Contractor, ultimately increasing the level of risk on the delivery of the project. The degree of functionality for the ERMIS standard software is another cause for possible delays.</p> <p>The above mentioned risks will impact the milestones for CT, external and national domain.</p>
EE	6	Med	EE indicated that the procurement process is delayed with all milestones being impacted, in particular CT and Deployment. However, overall the delivery is still foreseen within the Deployment deadline. EE noted that all analysis is complete and mostly developed. At the time of writing the CT is ongoing.
ES	5	Med	<p>ES associated an increased risk level related to the delivery of the project, considering that it requires a high level of coordination between countries and a significant effort in transition management.</p> <p>According to ES the planning was updated, given that NCTS – Phase 5 will be delivered after AES, with operations confirmed for 15/11/2023.</p>
FI	6	High	The implementation of NCTS – Phase 5 is ongoing, with the Conformance Testing activities underway. The need to build a new system has had impact on CT and Deployment, therefore delays are to be expected however the system is still foreseen to be delivered in a timely manner.
FR	4	High	<p>FR noted that there will be an anticipated delay of Deployment into production of 1 quarter regarding Phase 5. There are several causes: lack of human resources, delays on software on contractor's side, changes in specifications agreed at EU level and lack of budget. To this it can be added the fact that the current Transit application still needs an increased level of support and the existing competition with other projects. The milestones related to Conformance Testing and Deployment will be impacted. Furthermore, FR stated that for Phase there are 5 iterations planned, implementing DTI mode from iteration 3 in order to avoid delay on Conformance Modes 1 and 2.</p> <p>It was emphasized that the capability for completing this project in a timely manner, even before the expected deadline existed and still exists, however Phase 5 is not a priority for the French national administration. FR concluded by saying that Export followed by Transit will be implemented in 2023 with AES interface.</p>

MS	Complexity Rating	Risk Level	Additional Comments
GR	6	High	GR noted that they are expecting an anticipated delay on finalisation of the Technical Specifications of 2 quarters, but overall the system is anticipated to be completed within the deployment deadline. A primary cause for delay is the actual delay in the call for tender procedures, with a particular impact on Conformance Testing and Deployment activities. Internal discussions are underway in order to assess the situation.
HR	5	High	HR indicated that there will be an anticipated delay of Deployment into production of 1 quarter regarding Phase 5. The system is considered to be delayed, but overall foreseen to be delivered within the Deployment deadline. A main cause identified was the RFC's that have been introduced to be implemented late in the construction phase of NTA, which disrupted the testing process. HR explained that CT and Deployment in production are most impacted and that in order to meet the deadline of delivery they will have to first carry out the Conformance Testing campaign and afterwards to implement the large number of changes into NTA. This will create a clear view on the changes and if they are applied correctly. At the current stage, a new tender procedure is underway.
HU	5	Low	HU aspires to complete the development phase and start CT Mode 1 before the end of the year. Due to unforeseen constraints, the 2021 planning schedule had to be revised and the dates of most national tasks and milestones have been delayed.
IE	6	Med	IE mentioned that delays are possible given that the testing of AES and the Transition Handler (TH) will be complex and can create challenges, with the TH being a new concept. Internal system started end of April 2022 with Conformance Testing as of 13/06/2022.
IT	5	Med	The project has a medium level of risk, given its success mainly depends on the development and conformance testing activities performed by economic operators to adapt their IT systems while respecting the planned deadline. The major change made to the 2021 national planning concerns the slippage of the expected date of deployment of the system from 27/02/2023 to 08/05/2023. The delay is due to the greater effort requested for the implementation of the changes (RFCs) approved in 2021 and 2022. Both AES & NCTS-P5, were planned together, with the national development completed and CT Mode 2 currently underway.
LT	3	Med	According to LT, about 5 months were lost due to contractual difficulties related to an unsuccessful procurement. The national plan will be amended with some changes to the dates for testing, with the new deployment date set 01/10/2024.
LU			LU expressed that for NCTS-P5 they expect a mid-December delivery from their provider and a go-live date of 10/01/2023.
LV	3	Med	A medium risk is associated with the delivery of the project, in particular concerning the deployment of the system. In order to prevent this from happening LV will deploy NCTS – Phase 5 with limited functionality. Both AES and NCTS – Phase 5 will be deployed in a “big bang” approach in October 2023.
MT	5	Low	Regarding NCTS Phase 5 the migration window is towards the end of the deployment period, however the volume of transit declarations annually is very small, therefore issues are not envisaged. A similar situation applies for AES.

MS	Complexity Rating	Risk Level	Additional Comments
NL	5	High	For NCTS – Phase 5, NL announced a delay for deployment, with a new date set for 01/04/2024. At the same time, NL is considering using a partial deployment approach.
PL	5	Med	<p>The Conformance Testing campaign is planned for the period 31/05/2022 -01/09/2022.</p> <p>PL stated that the system is delayed, with the delivery foreseen within the Deployment deadline caused by prolonged tendering and staff related problems due to COVID-19 pandemic.</p> <p>In June 2022 PL will announce that is ready to start testing with economic operators based on DDNTA v5.14. PL will also inform economic operators that a decision has been made to implement the production system based on the v5.15 specifications. This implementation is envisaged for January 2023. The v5.15 specifications PL plans to publish in August/September 2022 with the list of changes to v5.14.</p> <p>Conformance testing will be performed based on specifications and scenarios (v.5.14), however additional CT testing will be needed for the changes resulting from specifications of v5.15. At the same time it was stated that integrations with other national systems will be added gradually as those systems will be ready.</p> <p>The Mode 1 of CT is extended due to preCT and internal acceptance process.</p>
PT	6	High	PT will perform national, external and common domain tests with Central Systems and Traders. PT indicated that there is a risk related to delivery due to the need of an implementation of a completely new National Transit System. An agile development approach will be used to reduce implementation timeframe.
RO			A “Big Bang” operation is scheduled for both AES Phase 1 and NCTS Phase 5 for 01/09/2023. The delay is mainly attributed due to delay of the tender.
SE	5	High	<p>Conformance Testing will be based on ongoing connectivity tests.</p> <p>A risk for delays has been associated with the timely delivery of the project given that the hired contractor has implemented major changes to the product and platform at a very late stage, causing a delay of three months compared to last years report.</p>
SI	5	Low	NCTS – Phase 5 will be deployed in February 2023 using a “big-bang” approach. The development of the application was made by the combination of both the iterative and agile approaches.
SK	1	High	<p>The system order is currently under discussions with an emphasis on the supplier. For both NCTS – Phase 5 and AES, SK is planning to deploy the systems by deadline in a “big bang” approach.</p> <p>It is expected to have the contract in place by the end of August, bearing a risk of delay considering the tight timeline.</p>

Table 37: Detailed responses from Member States – NCTS – P5



The risk assessment of National Project Plans of the Member States by the Commission Services is shown and substantiated in the table below:

<b>NCTS-P5 (23.08.22)</b>													
	in procurement or inception	NPP in review	NPP in preparation	Shift from 2020 Baseline	Shift from transRep21Q4	Conformance Test too short	Start of Depl in Last 3 Qtrs	Start of Depl in Last 2 Qtr	Start of Depl in Last Qtr	Start of Depl on 01.12.23	Start of Depl after 01.12.23	Trade window too short	Comments
AT	✓	✓	✓	✓	✓	✓					✓	✓	Operation in 2024
BE				✓	✓		✓					✓	
BG				✓	✓			✓				✓	
CY	✓	✓		✓				✓					In inception
CZ				✓			✓					✓	
DE													
DK				✓	✓		✓					✓	
EE				✓			✓					✓	
ES				✓					✓				
FI				✓	✓			✓					
FR				✓	✓			✓					
GR	✓	✓		✓		✓			✓	✓		✓	Zero contingency
HR				✓	✓		✓					✓	
HU	✓	✓						✓					In procurement
IE								✓					
IT				✓	✓								
LT	✓			✓	✓						✓	✓	Operation in 2024
LU				✓	✓								
LV				✓					✓			✓	Little contingency
MT	✓			✓				✓					Zero contingency
NL		✓		✓	✓						✓		Operation in 2024
PL				✓	✓	✓							
PT									✓	✓		✓	Zero contingency
RO		✓		✓				✓				✓	In inception
SE				✓	✓	✓		✓				✓	Little contingency
SI				✓								✓	
SK	✓	✓		✓		✓			✓	✓		✓	Zero contingency

Table 38: Risk Assessment: NCTS – P5

Figure 28 provides the distribution of Member States in regards of the status of their interface with Trade and of their project implementation.

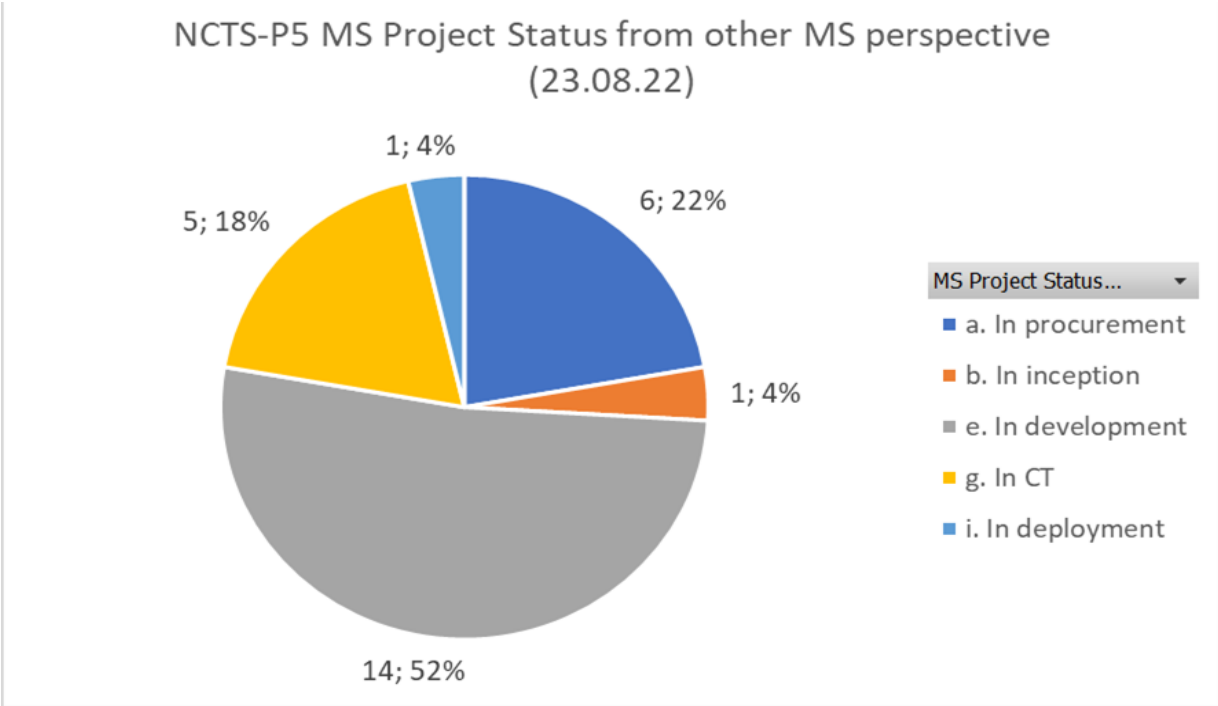
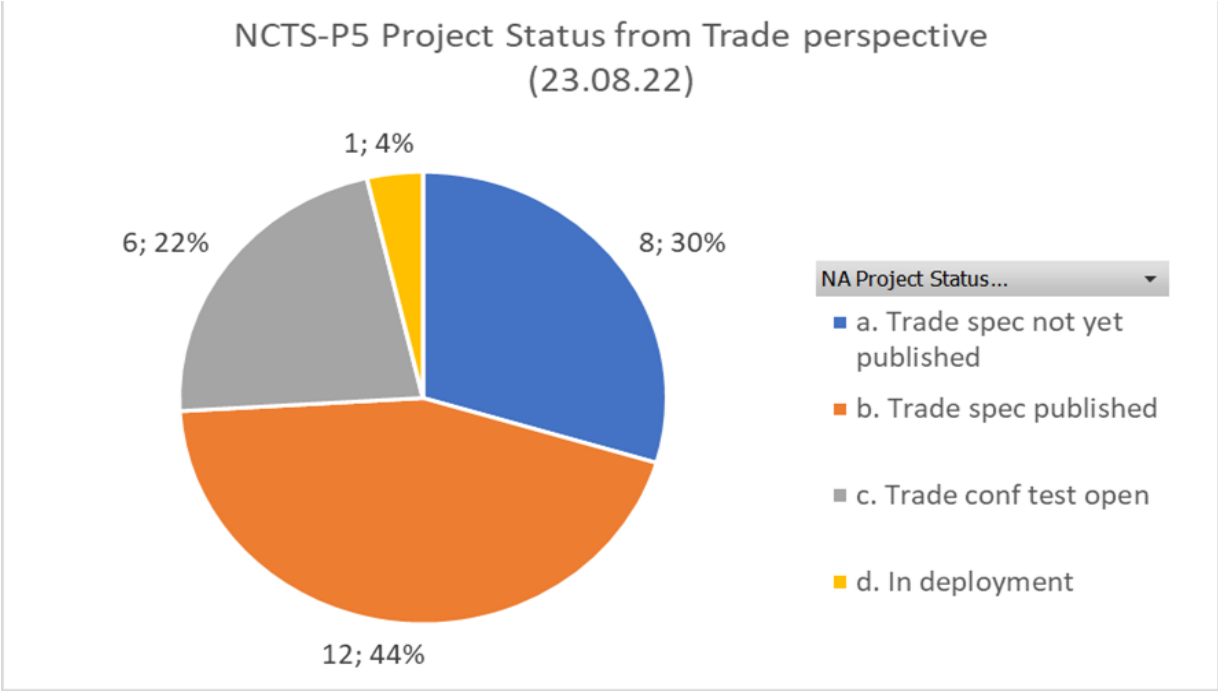


Figure 28: Project Status as per latest national project plans – NCTS – P5

## *NCTS – Component 2*

### **Summary from the Commission:**

The aim of NCTS – Phase 6 is to complete the alignment of NCTS to the Safety & Security data specified in the latest releases of the UCC DA/IA Annex B. Phase 6 will also implement specific requirements in transit customs declarations of goods brought into the customs territory of the Union. The main goals are to secure the continuity of the long established practice of the combined declaration and to ensure a fully integrated management of the Safety and Security provisions of the UCC in NCTS to prevent a duplication of processes and systems for the trade and the MSs. NCTS - Phase 6 will interface with the ICS2 system to minimise the IT burden of the MS and trade. NCTS – Phase 6 will further harmonise the presentation process across all Customs Offices of the Member States, which is a major step forward. It will set a stepping stone for future Smart Border initiatives between Member States and other neighbouring countries.

An initiative was launched to perform a feasibility study on the interconnection between ICS2 and NCTS in April 2020, including an analysis of the Safety and Security (S&S) requirements and the possible implementation options. A survey was conducted to support the analysis of the current and the possible future situation. The Feasibility Study proceeded to an extended analysis of the potential business processes for lodgment and processing, as well as amendment and invalidation of a combined declaration, incorporating the business process and data declaration analysis results. The outcome confirmed that the communication of ICS2 and NCTS - Phase 6 is feasible. The Feasibility Study was eventually translated into the Business Case by mid-2021.

At the request of the Member States, the Business Case was suspended awaiting for the analysis of the technical implications of the proposals made. The Member States requested more clarity on the implication for the Opt-in and Opt-out MSs regarding the option of the combined declaration facility that they might offer or not to their trade and regarding the interface between NCTS and ICS2 R3.

A Technical Study conducted in the second half of 2021 with the Member States provided the expected clarifications and details. Via a technical survey, trade and Member States confirmed their support for the continuation of the Combined Declaration practice while emphasizing the challenge to reconcile the expectations set by NCTS and the Safety and Security provisions of the UCC. The deployment planning of ICS2 R3 and NCTS - Phase 6 were aligned to allow a progressive migration of the Member States from the current Safety & Security provisions of NCTS to the one set by the UCC Annex B from June 2024 to March 2025. While considering the pressure growing on the milestone of NCTS - Phase 5, the use of the agile methodology should reduce the risks for all parties (parallel elaboration of the BPM and Technical Specifications). The Vision Document was produced on the basis of this Technical Study end 2021.

The Business Case and Vision Document were approved in December 2021.

Elaboration activities for the Technical System Specifications and the BPM are taking place in 2022, with functional and technical specifications being elaborated in parallel, in iterations. Preparatory steps are taken to start the Conformance Test before mid 2023. However, the plans for the Conformance Testing and Deployment may be affected by some Member States deploying the Phase 5 later than planned.

## 4.1.12 Overview of Project Progress

Table 39 highlights any known divergences in the planning compared to the dates set in the Work Programme<sup>53</sup>. As this project has a deployment window, the ‘Deployment’ and ‘Operations’ columns are shown. If there is a difference in these two dates, this implies that a migration period is planned.

Respondee	Technical Specifications			Conformance Testing		Deployment (Start of the deployment window)			Operations (End of the deployment window)	
	Target date from WP	2022 Planned/ Actual End Date	2022 % of Completion	2022 Planned/ Actual Date	2022 % of Completion	Target date from WP	2022 Planned/ Actual Date	2022 % of Completion	Target date from WP	2022 Planned/ Actual Date
European Commission	31/12/2019	Not Provided	Not Provided	Not Provided	Not Provided	01/03/2021	Not Provided	Not Provided	01/12/2023	Not Provided
AT		01/06/2021	Not Provided	N/A	Not Provided		30/06/2024	71%		30/06/2024
BE		01/02/2020	100%	01/10/2022	50%		01/06/2023	50%		01/06/2023
BG		15/08/2022	100%	01/03/2023	0%		28/08/2023	36%		28/08/2023
CY		01/12/2022	100%	11/11/2022	100%		27/06/2023	33%		17/07/2023
CZ		21/10/2021	100%	01/07/2022	100%		03/04/2023	58%		03/04/2023
DE		26/10/2020	100%	18/01/2021	100%		01/10/2021	92%		16/06/2023
DK		01/08/2022	75%	10/09/2022	40%		01/05/2023	50%		30/08/2023
EE		31/05/2022	100%	01/12/2022	50%		30/06/2023	50%		30/06/2023
ES		30/06/2022	100%	01/05/2023	50%		01/07/2023	45%		15/11/2023
FI		07/12/2021	100%	03/10/2022	50%		04/09/2023	25%		29/09/2023
FR		30/11/2021	100%	15/01/2023	60%		01/01/2023	50%		01/12/2023
GR		31/10/2022	100%	02/05/2023	0%		01/12/2023	25%		01/12/2023
HR		31/12/2021	100%	01/09/2022	100%		01/04/2023	58%		01/04/2023
HU		01/12/2022	100%	17/03/2023	10%		30/08/2023	33%		30/11/2023
IE		19/08/2022	100%	21/08/2023	0%		21/08/2023	42%		19/10/2023
IT		15/02/2021	100%	07/02/2022	90%		14/09/2022	75%		01/03/2023
LT		01/10/2023	90%	26/02/2024	10%		01/10/2024	0%		01/10/2024
LU		01/06/2021	Not Provided	14/02/2022	Not Provided		01/10/2022	73%		01/07/2023
LV		01/03/2021	100%	27/02/2023	50%		02/10/2023	33%		02/10/2023
MT	N/A	100%	07/03/2023	50%	01/09/2023	44%	01/12/2023			
NL	01/10/2021	100%	01/04/2024	0%	30/06/2024	73%	01/06/2025			
PL	31/05/2021	100%	08/06/2022	100%	16/01/2022	67%	30/11/2023			
PT	01/01/2023	100%	15/03/2023	0%	01/12/2023	42%	01/12/2023			
RO	17/11/2022	Not Provided	30/05/2023	Not Provided	01/09/2023	25%	01/09/2023			
SE	01/12/2021	100%	23/02/2023	0%	01/09/2023	29%	01/09/2023			
SI	15/02/2020	100%	10/01/2022	100%	01/02/2023	83%	01/02/2023			
SK	31/10/2022	0%	15/09/2023	0%	30/11/2023	11%	30/11/2023			

Table 39: Comparison of Planned and Actual Dates – NCTS – P5

The deployment of NCTS - Phase 5 shows a delay of 3 quarters in comparison with the initial national plans filed at the end of 2020 (respectively Earned and Planned Value in the figure below<sup>54</sup>). The deployment of NCTS - Phase 5 is currently at 48% (Earned Value) while it should be at 72% (Planned Value). The Member States will speed up their projects and contain their risks to reach the milestones of deployment by 1 December 2023.

<sup>53</sup> The percentage of deployment refers to DG TAXUD preparation and the aggregated progress of Member States based on their National Project Plans.

<sup>54</sup> The Planned and Earned Values are built on a basket of 12 key milestones across all the Member States

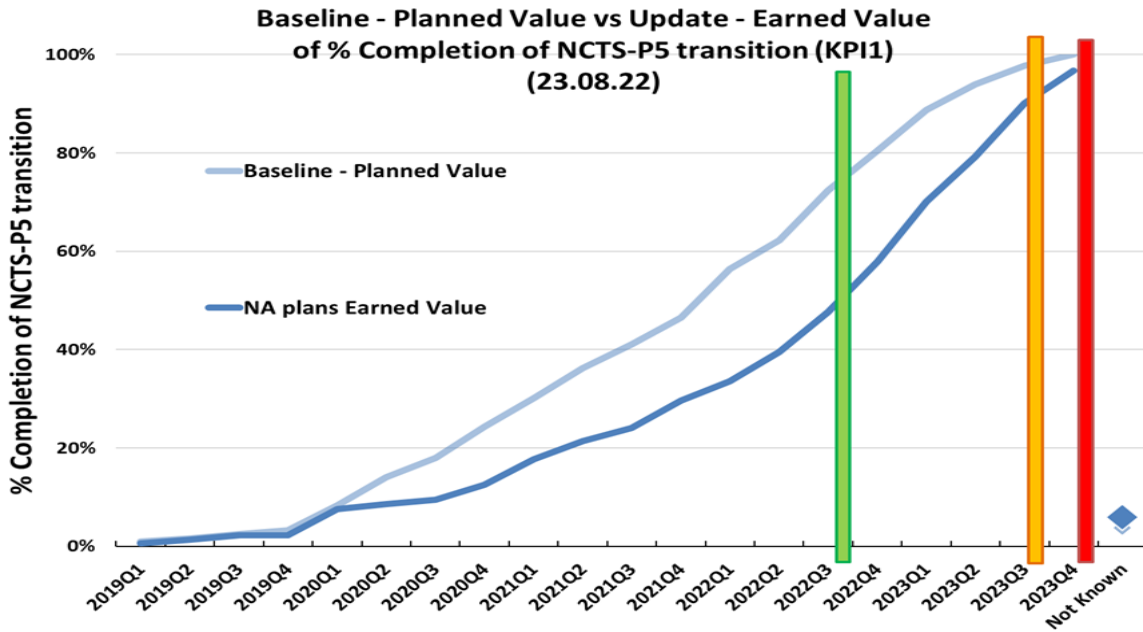


Figure 29: Conformance tests: Planned value versus earned value – KPI1- NCTS – P5

Figure 30 below shows the percentage of Member States in Conformance Tests. The light grey curve (the planned Value) is the baseline set by the Member States’ plans end 2020 while the dark purple (the Earned, alias Actual, Value) is the one compiled from the latest NPP submitted before 23.08.2022.

The figure below shows that the peak of Conformance Tests has shifted by 3 quarters from the baseline of end 2020 and raised in volume. The Conformance Tests bells are now skewed to the right in comparison of the baseline, as late-runner MSs will complete their Conformance Tests campaigns during the last quarter of 2023.

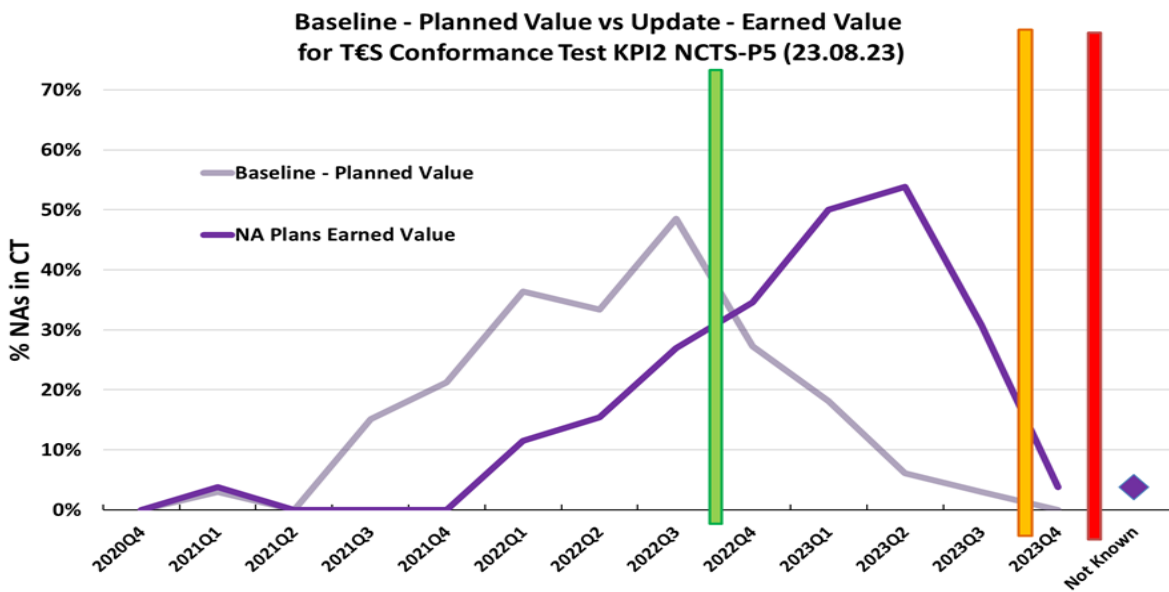


Figure 30: Conformance tests: Planned value versus earned value – KPI2-NCTS – P5

Additional details regarding the specific percentage of completion per milestone can be seen in Figure 31.

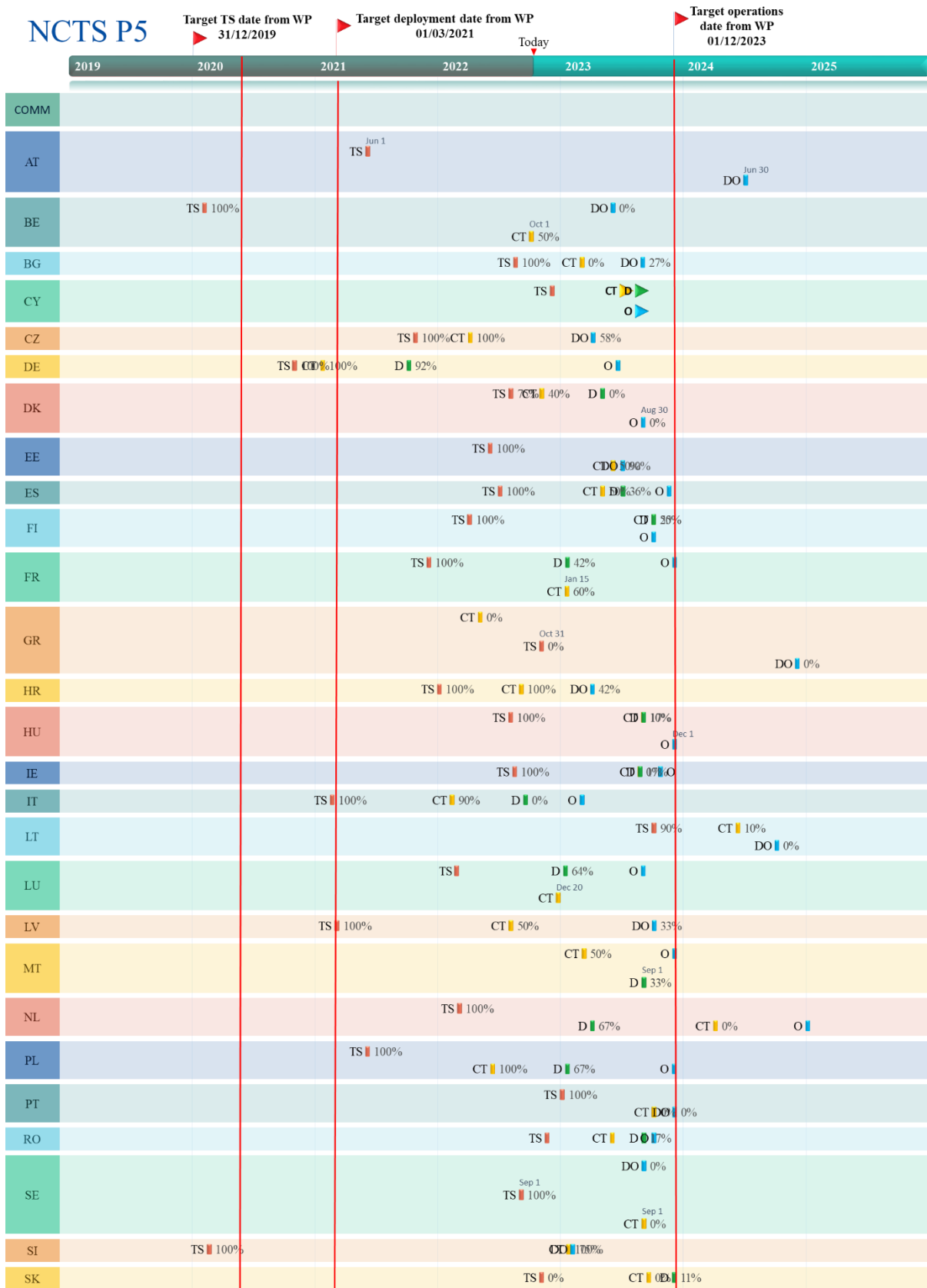


Figure 31: Percentage of Completion per Phase – NCTS – P5

The figure below illustrates the four milestones set in Article 278(a) of the Regulation (EU) 2019/632 amending Regulation (EU) 2013/952 as reported by each Member State in their national plans, ranked by their entry in deployment window for the traders. It illustrates how the deployment window for the trader shortens with its later start, the entry into force of the final provisions of the UCC being a legally set milestone by the UCC work programme.

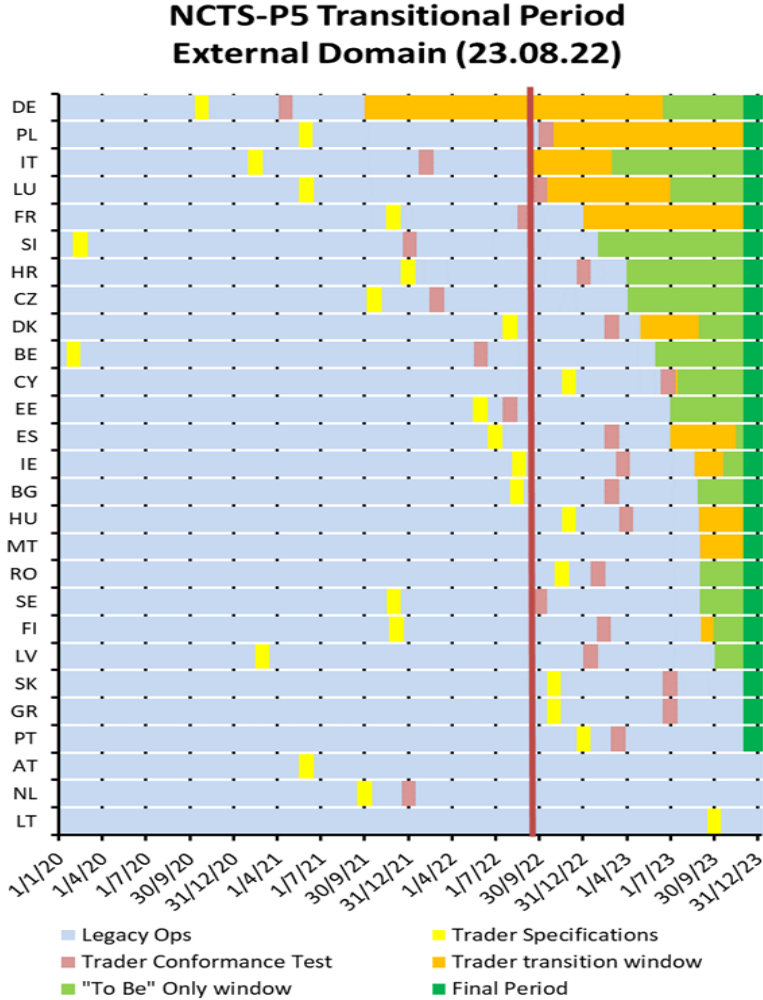


Figure 32: NCTS – P5 Transitional Period

#### **4.7 UCC AUTOMATED EXPORT SYSTEM (AES)**

The AES project consists of an upgrade of both the existing trans-European Export Control System and the existing national export systems. It aims to implement the UCC requirements for export and exit of goods, including export and re-export declarations; EXS and centralised clearance for Export, re-export notifications and an interface with EMCS and NCTS. The project entails implementing the UCC simplifications offered to trade to facilitate export of goods for European companies, such as centralised clearance for export, and the UCC obligations to better monitor what exits the customs territory of the Union to prevent fraud. The export declaration, and all linked message exchanges as well as the Arrival At Exit Notification and Exit Summary declaration are subject to considerable rework. The proposed message structures are fully convertible from/to “Legacy”/”To Be” ones, guaranteeing a smooth transition and fostering business continuity from Q1 2021 until Q4 2023.

The following processes will be implemented:

- Export declaration pre-lodgement;
- Handling of simplified/supplementary declarations;
- Centralised clearance for export;
- Re-export notification;
- Export process followed-up by the transit TES and better monitoring of trade flows;
- Export handling of goods under excise duties suspension interoperability with EMCS;
- Facilitate legitimate trade & combat fraud;
- Strengthen the safety and security for exit.

In terms of planning, the system is comprised of two components.

The first component relates to the “trans-European AES”. The aim of the project is to further develop the existing trans-European Export Control System (ECS) in order to implement a full AES that would cover the business requirements for processes and data brought about by the UCC. These processes and data will include the coverage of simplified procedures and centralised clearance for export. It will also cover the development of harmonised interfaces with the Excise Movement and Control System (EMCS) and NCTS. As such, AES will enable the full automation of export procedures and exit formalities. The system includes some parts to be developed centrally, but the main components are to be developed at the national level.

The second component relates to the “National Export Systems upgrade” and aims to upgrade the national systems used for the completion of certain formalities not impacting the common domain of the AES.

It is important to highlight that the AES system specifications developed at central level (Functional System Specifications (FSS) and Technical System Specifications (TSS)) cover the information exchanges (IE) in the common, national, and external domains:

- The common domain communication refers to the information exchanges between customs offices located in different Member States.
- The national domain includes the interface between national AES and other systems at national level (e.g., AES-EMCS and AES-NCTS).
- The external domain includes the communications between the customs offices and the declarant/trader at exit, at national level.

Regarding the message exchanges on the common domain, the AES specifications prepared by DG TAXUD are mandatory for all the Member States. In case of external or national domain, the common AES specifications are strongly recommended, aiming to harmonize the export and exit formalities as much as possible among the Member States.

The 27 Member States (and Northern Ireland under the NIP) are the parties in operation for the Export Control System (ECS). They all need to transition to the AES system by the 01.12.2023.



## 4.1.13 Summary of Responses

### *AES – Component 1*

#### **Summary from the Commission:**

For AES, the challenge is to ensure business continuity and smooth Member State and trade transition while applying significant changes in the applicable Data and Process models. The Member States approved a new set of specifications which will rule the quality, technical support, business continuity, security and capacity of the future AES operations (Service Management, Service Level Agreement, Terms of Reference, Crisis management, Capacity Plan, Security Plan). So far, no delays have materialised on the central components and the project is currently on track.

The Commission and the Member States are engaged in an important transition for the trans-European customs systems for export and transit, starting with the successful deployment of the new AES in DE in March 2021 and the successful entry in international operation of AES on the 26 April 2022 by ES and DE. This opened the path to the next generation of interconnected trans-European systems for the trade community and the national customs authorities, demonstrating the quality of the Specifications and legal provisions underpinning these two systems and most importantly their business continuity. The new export and transit systems offer significant benefits and enable simplifications while ensuring the business continuity with the systems in operation so far. This important milestone has been achieved thanks to the close collaboration between the Commission, the national customs administrations and the trade associations.

The AES project pioneered a collaborative, iterative and agile working method that has been praised by all Member States and traders involved. The agile approach adopted since the start of the project pays off in terms of functional and technical quality and of actual progress of the Member States. The collective intelligence of the Member States is a critical asset for the success of the transition at stake.

#### Start of AES operation

**The highlight of 2022 is the start of the international operation for AES with DE and ES on 26/04/2022.** It happened without issue and the operation has been smooth since. The central Converter ieCA developed and operated by the Commission and other central systems deliver according expectation. This major achievement is the result of 3+ years of the intense collaborative work between the Member States and the Commission. It opened the transition on the Common Domain.

#### Increasing progress of the MS in 2022

The Member States have booked significant progress in the deployment of their national export applications in 2022. 74% of the Member States are actively engaged in their implementation, while 52% of the Member States already published their trader specifications, 26% of the Member States are in the procurement or inception stage, and almost ready to start. Refer to Figure 33 below.

The Member States have progressed in their specifications and developments, some through their Conformance Tests, other in their connectivity with the Central Services. The % of completion of the transition is at 48% up by 20% since end 2021.

#### Ramp up of the Conformance Tests in 2022 and entry in operation

33% of the MS have already started their Conformance Tests.

PL, NL, IT, SI and HR will join the AES operation by end 2022 early 2023.

#### Shift of the national project plans to 2023 and beyond

The plans of the Member States continue to drift closer to the deadline of the 01.12.2023 set by the UCC Work Programme.

The transition faces a delay of equivalent to 3 quarters as the % of completion of the transition should be at 71% according to the 2020 plan. Refer to Figure 33 below.

All Member States but three re-confirm that they will be in operation before the 01.12.2023 deadline for the entry into the final provisions of the UCC as illustrated in Figure 33. AT, FI and SE signalled their intention to enter in operation mid-2024 or in the second half of 2024.

DE is the leading Member State, having entered national operation in March 2021, as planned.

DE and ES started the international operation of AES-P1 on the 26/04/2022.

A group of five Member States (NL, IT, PL, HR and SI) will be the first wave of Member States joining DE and ES into operations end 2022 - early 2023. The transition will spread over five quarters.

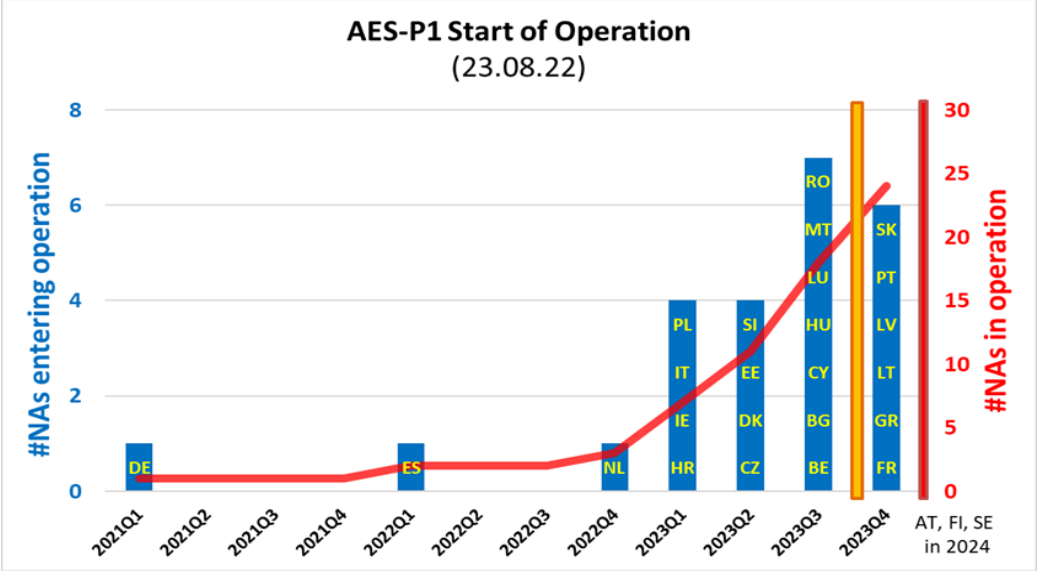


Figure 33: AES – Component 1 National Administrations entry into operations as of 23 August 2022

DG TAXUD assessed that 44% of the Member States’ plans pose challenges to the orderly and timely transition to the final provisions of the UCC by the 01.12.2023 and to the smooth transition of trade (Table 41: Risk Assessment: AES – Component 1).

The main incentives for the Member States to prioritize AES are the critical need for business continuity, the importance of Export in a post Brexit EU, the early availability of the common technical specifications<sup>55</sup> and the awareness that the Return on Investment of each MS and the value for Trade depend from the readiness of all other Member States.

Recommendations to the Member States

The Commission invites the Member States to take all mitigation actions to avoid delaying their readiness beyond the 01/12/2023 milestone set by the UCC Work programme.

The Member States at risk of missing the deadline or already signalling an entry in operation after 01.12.2023 should take advantage of the 5 quarters remaining before the deadline to speed up their implementation or to start working on their “plan-B” to secure their business continuity under the final provisions of the UCC.

The Commission invited the Member States that have not yet done it, to publish their trade specifications without any delay and by the 3<sup>rd</sup> quarter 2022 at the latest.

The Coordination programme

<sup>55</sup> NCTS-P5 is the only project along with AES-P1 which has had its common technical specifications approved 4 years before the date of entry in operation.

Under the umbrella of the “National Administration coordination programme” the Commission assists and monitors the development and deployment of the national components for AES by the Member States. 90+% of Member States submit regular updates to their national project plans. The Trade Community is kept regularly informed of the progress achieved and of the national project plans.

**Summary from the Member States:**

Regarding AES – Component 1 most Member States have reported a low/medium risk level on the on-time delivery of the project, with only a few of them rating it as high. The complexity of the system is being assessed as medium/high, given the many interdependences among systems.

The main risks reported relate to:

- Delay in call for tender procedures, procurement and service providers;
- Competing priorities and inter-dependencies within and outside the UCC Work programme i.e. eCommerce and ICS2;
- Lack of resources (staff & budget);
- The COVID-19 pandemic;
- Transition;
- Delay from the traders;
- Changes in the specifications.

Many Member States have also informed that an agile development methodology was adopted in order to reduce the implementation timeframe.

In terms of assessing the level of completeness of the system, more than half of the Member States reported that the system is on target, with the others stating that currently the development is being delayed, but overall the Deployment is still foreseen within the provided deadline. The % of Completion of each of the Member States projects according their respective national project plans is provided in Table 43 below.

DE completed the project development, with the following functionalities to be deployed until the end of 2022: Centralised Clearance, Update of the national interface Export followed by Transit and Business Statistics (IE411C). FI mentioned that according to their planning, the project is currently delayed beyond the foreseen Deployment deadline, given several risks factors: the need to prioritize NCTS and other parallel projects, AES requiring many integrations, COVID-19 impact and shortage of resources especially on suppliers side.

**Detailed Responses:**

Table 40 provides the individual Member States’ responses to the survey:

MS	Complexity Rating	Risk Level	Additional Comments
AT			
BE			
BG	4	Low	Same response as for NCTS – Phase 5.
CY	6	Low	Same response as for NCTS – Phase 5.
CZ	6	Med	Same response as for NSP EXP.
DE	6	Low	DE indicated that for AES - Component 1 the Conformance Testing activities related to Mode 2 are completed and ready to start production. The following functionalities will be deployed until the end 2022: (1) Update of the national interface Export followed by Transit; (2) Business Statistics (IE411C). DE is making use of an agile development approach in defined software release-cycles. The ongoing activities concern the finalisation and fine-tuning AES (e.g. adaptation of Surveillance), the monitoring of operations as well as the preparation of remaining Conformance Tests for new functionalities of AES (e.g. centralised clearance) and the start of the Conformance Test (certification) of economic operators.

MS	Complexity Rating	Risk Level	Additional Comments
			The end-date of the transition window for trader has been shifted from end 2022 to June 2023 to allow maximum flexibility to migrate from ECS-P2 to AES.
DK	6	Med	Same response as for NCTS – Phase 5.
EE	5	Med	EE mentioned that due to lack of financing for the development of the system, the delivery could be affected.
ES	5	Low	For AES the launch for common domain took place on 26/04/2022, after finalising testing with DE. Testing with traders on the external domain is underway. ES indicated that for EXS there will not be any Office of Lodgement available. At the same time an iterative approach is being used for the system development.
FI	6	High	According to FI national project plan, the AES system will be postponed, with a new feasible deadline set for 30/06/2024. The main causes identified are: the prioritisation of NCTS, other parallel projects, the severe impact of the COVID-19 pandemic and the shortage of resources especially on suppliers side.
FR	6	Low	According to FR, AES will be split in 2 phases with one main release to ensure business continuity, and subsequent releases, postponed to 2024, that will cover the deployment of CCE, EXS and interfaces with EMCS and NCTS.
GR	6	High	Same response as for NCTS – Phase 5.
HR	6	Med	HR explained that the RFC's being introduced late in the stage of the development disrupted the testing process, ultimately impacting CT activities.
HU	6	Med	None.
IE	6	Med	IE stated that Conformance Testing activities will be performed during 2022 for AES – Component 1. Delays are possible given that the testing of AES and the Transition Handler (TH) can create challenges due to their complexity, considering that the TH is at the same time a new concept. Internal system started end of April 2022 with Conformance Testing as of 13/06/2022.
IT	5	Med	Same response as for NCTS – Phase 5.
LT	4	Med	Due to complex and lengthy service procurement procedures the system is expected to be delayed, the impact being reflected on Conformance Testing and Deployment activities. However, the operation date of December 2023 is still feasible.
LU			For LU a go-live date of 15/10/2023 is being envisaged, while the pessimistic planning would be 01/10/2024.
LV	4	Med	Same response as for NCTS – Phase 5. LV explained that Technical Specifications will not be provided considering the lack of the External Domain API.
MT	6	Med	Numerous activities concerning various systems happening all in the same period are affecting the delivery deadline, having Technical Specifications as the most impacted milestone.
NL	4	Low	For AES they split the work for export, exit and centralised clearance for export (CCE). NL explained that the complexity level of the project is being influenced by the fact that the Export and the Exit are being supported by different applications. In this light, Export is an upgrade of an existing system, while Exit is becoming a new application. Furthermore, many MASP-projects developments happening all at the same time and influencing each other are adding to the complexity of the system. The third part will be focused on the CCE, with a deployment date envisaged for 2025. Conformance Testing and Deployment activities for CCE are

MS	Complexity Rating	Risk Level	Additional Comments
			impacted. In this light, NL is considering combining CCE with CCI Phase 1 and 2 in 2025. NL indicated that an agile approach is used for the system development, with current activities focused on finishing the features based on the current version of the DDNXA.
PL	5	Med	PL stated that the key factor in the system implementation process is the necessity of connection of AES-P1 with national systems developed simultaneously in customs administration. During the implementation of the new system, the project team registered several risks, such as the IT provider quality of service, the delay on software deliverables on contractor's side or the lack of human resources on both sides. In this light, it is estimated that not all software providers will manage to develop new client applications on time. At the same time the COVID-19 pandemic has created an unstable environment, that has been impacted work progress across all systems. In 2021 PL has redefined their National Project Plan, having set Q4 2022 as a new date for implementation of AES-P1. The development of the project will consider both an agile and an iterative approach.
PT	6	High	Same response as for NCTS – Phase 5.
RO			Same response as for NCTS – Phase 5.
SE	4	Low	In the case of AES, SE had already advised a delay and this was confirmed with deployment now planned for 01/10/2024, with full operations by 31/12/2024. The outlined national project plan for AES is being followed and according to SE comments the foundation for the system has been created with a plan to add the skeleton starting september 2022. Although the system is considered to be complex considering all the interdependencies and the way of elaboration, this is not appreciated as a stopping activity. SE will avoid implementing a phased approach, given the possible cumbersome development and its impact on the timely delivery.
SI	4	Low	The first version of SIAES2 (Slovenian Automated Export System - 2nd generation) was successfully installed in the test environment on 23/02/2022. The technical documentation is completed, as well as the National Domain Testing (Mode 0), the Conformance Testing activities for Mode 1 started May 2022 and the development of the new export application is roughly complete. According to SI the deadline remains the same: 01/05/2023.
SK	3	High	SK explained that the system is considered to be delayed, however the delivery is still foreseen within the Deployment deadline. One of the primary causes is the lack of financial and human resources. At the current stage, the procurement on technical analysis is complete, with Conformance Testing activities planned for Q2 2023.

Table 40: Detailed responses from Member States – AES – Component 1

The risk assessment of national project plans of the Member States by the Commission Services is shown and substantiated in the table below:

AES-P1 (23.08.22)													
	in procurement or inception	NPP in review	NPP in preparation	Shift from 2020 Baseline	Shift from transRep21Q4	Conformance Test too short	Start of Depl in Last 3 Qtrs	Start of Depl in Last 2 Qtr	Start of Depl in Last Qtr	Start of Depl on 01.12.23	Start of Depl after 01.12.23	Trade window too short	Comments
AT	✓	✓	✓	✓								✓	Operation in 2024
BE				✓	✓	✓		✓				✓	
BG				✓	✓	✓		✓				✓	
CY	✓	✓		✓		✓		✓				✓	In inception
CZ				✓			✓					✓	
DE						✓							
DK				✓	✓		✓					✓	
EE				✓			✓					✓	
ES						✓							
FI				✓	✓						✓		Operation in 2024
FR				✓	✓	✓			✓				Little contingency
GR	✓	✓		✓					✓	✓		✓	Zero contingency
HR						✓						✓	
HU						✓		✓				✓	
IE						✓							
IT				✓	✓								
LT	✓			✓	✓				✓	✓		✓	Little contingency
LU	✓	✓		✓					✓				In procurement
LV				✓					✓			✓	Little contingency
MT				✓				✓					
NL				✓		✓							
PL				✓	✓	✓							
PT						✓			✓	✓		✓	Zero contingency
RO		✓		✓				✓				✓	Little contingency
SE				✓							✓		Operation in 2024
SI				✓		✓						✓	
SK	✓	✓		✓		✓			✓	✓		✓	Zero contingency

Table 41: Risk Assessment: AES – Component 1

Figure 34 provides the distribution of Member States in regards of the status of their interface with Trade and of their project implementation.

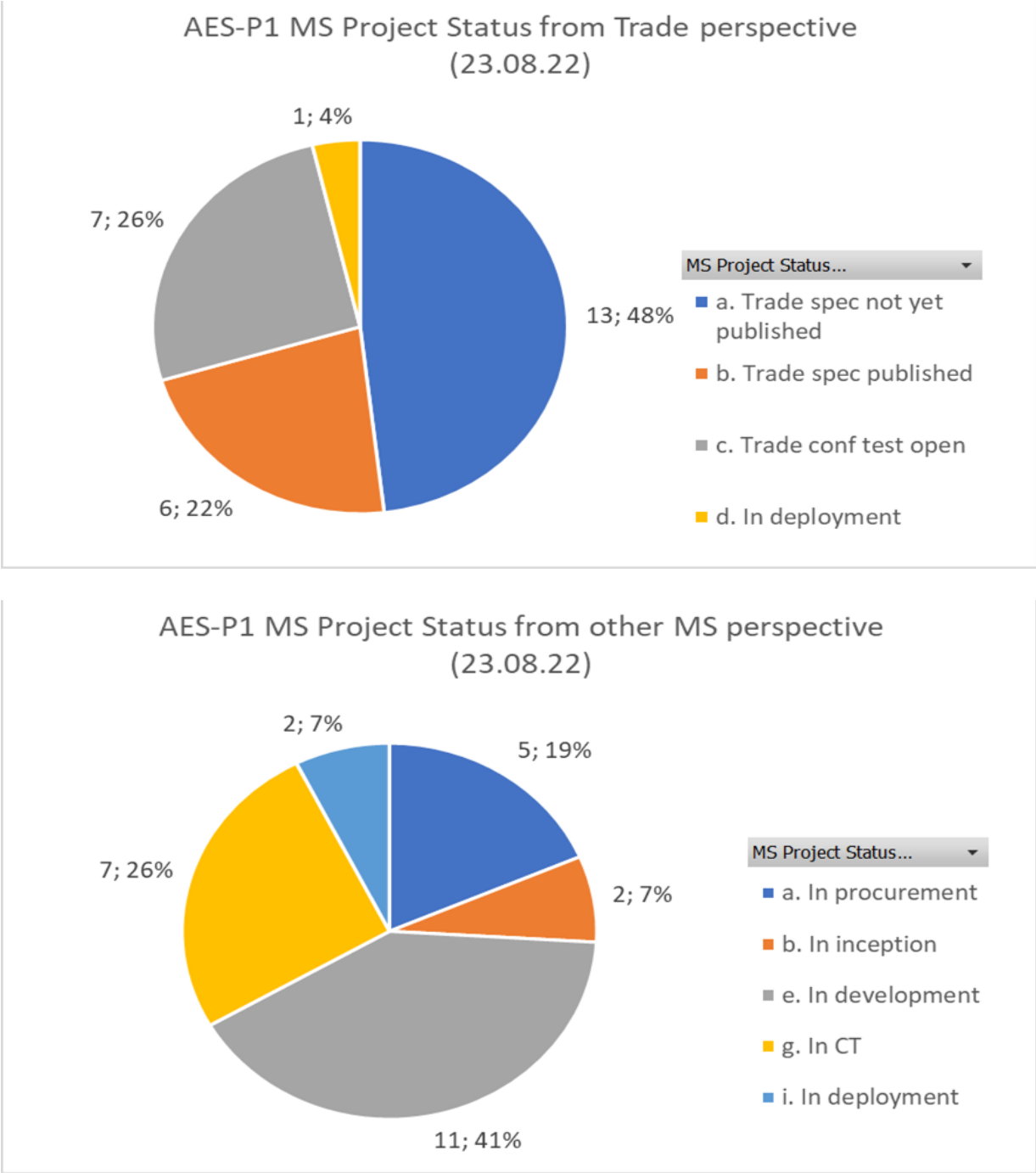


Figure 34: Project status as per latest national project plans – AES – Component 1

## AES – Component 2

### Summary from the Commission:

The Commission has provided the Member States with Functional and Technical Specifications, Annex B data and the required legal provisions. This was provided for the external domain with trade and for the national domain between the national applications and the common domain. Furthermore, the required interfaces and the proposed architecture were also provided.

### Summary from the Member States:

In relation to the on-time delivery of the project most Member States have reported a low/medium risk level, while only a few of them have rated it as high<sup>56</sup>. The complexity of the system is being assessed as medium/high, given the many interdependences among systems.

Various reasons were provided as the cause, such as:

- Procurement and service providers;
- Competing priorities and inter-dependencies within and outside the UCC Work programme i.e. eCommerce and ICS2;
- Lack of resources (staff & budget);
- The COVID-19 pandemic;
- Transition;
- Delay in call for tender procedures;
- Delay from the traders.

Some Member States have also informed that an agile development methodology is adopted in order to reduce the implementation timeframe, while a significant number prefer an iterative approach.

In terms of assessing the level of completeness of the system, more than half of the Member States reported that the system is on target, with the others stating that currently the development is being delayed, but overall the Deployment is still foreseen within the deadline (CZ, DK, GR, LT and SK). FI mentioned that according to their planning, the project is currently delayed beyond the foreseen Deployment deadline, given several risks factors: the need to prioritize NCTS and other parallel projects, with AES requiring many integrations, COVID-19 impact and shortage of resources especially on suppliers side.

A representative number of Member States have been either progressing or completed their Technical Specifications, while BG, GR, LT, MT and SK have not yet initiated the activities related to them. At the same time LV explained that they will not have External Domain API, therefore will not proceed in providing Technical Specifications for Trade.

### Detailed Responses:

Table 42 provides the individual Member States' responses to the survey:

MS	Complexity Rating	Risk Level	Additional Comments
AT			
BE			
BG	4	Low	Same response as for AES – Component 1.
CY			
CZ	6	Med	Same response as for AES – Component 1.
DE	6	Low	According to DE the trans-European AES is developed together with the national export component and corresponds to the national release AES 3.0.1 The acceptance test AES 3.0.1 started on 18/01/2021 and was carried out without interruption until 05/03/2021.

<sup>56</sup> FI, HU, PT and SK.



MS	Complexity Rating	Risk Level	Additional Comments
			The information related to AES – Component 1 is relevant for this section as well.
DK	6	Med	Same response as for AES – Component 1.
EE	5	Med	Same response as for AES – Component 1.
ES	5	Low	ES indicated that improvements have been made to the NPP. An iterative approach will be used for the system development.
FI	6	High	FI indicated that they are expecting a delay of 5 quarters on completion of the Conformance Testing activities and on Deployment into production. Additional information can be found under the section dedicated to AES – Component 1.
FR	6	Low	Same response as for AES – Component 1.
GR	6	High	Same response as for AES – Component 1.
HR	5	Low	HR explained that Component 2 will be developed in parallel with Component 1. All the functionalities that have been defined at this current stage, are being developed, with the rest to be completed by the end of the year.
HU	6	High	None.
IE	5	Med	Same response as for AES – Component 1.
IT	3	Low	According to Italy’s NPP for Component 2 national Conformance Testing will be performed and the deployment has been updated compliant to the new deployment date of AES Component 1. Therefore, the new date for AES - Component 2 has been postponed from 27/02/2023 to 08/05/2023.
LT	4	Med	Same response as for AES – Component 1.
LU			
LV	4	Med	Same response as for AES – Component 1.since
MT	5	Low	None.
NL			A partial deployment approach with limited functionality is envisaged, with the first part being focused on the adjustment to Annex B and a deployment date set for the end of 2022. Second part will be related to the new UCC-functionalities excluding CCE (deployment date set for 2023). NL explained that the complexity level of the project is being influenced by the fact that the Export and the Exit are being supported by different applications. In this light, Export is an upgrade of an existing system, while Exit is becoming a new application. Furthermore, many MASP-projects developments happening all at the same time and influencing each other are adding to the complexity of the system.
PL	5	Med	Same response as for AES – Component 1.
PT	6	High	Same response as for AES – Component 1.
RO			
SE	4	Low	Same response as for AES – Component 1.
SI	4	Low	Same response as for AES – Component 1.
SK	3	High	Same response as for AES – Component 1.

Table 42: Detailed responses from Member States – AES – Component 2

Figure 34 provides the percentage of Member States in each development phase.

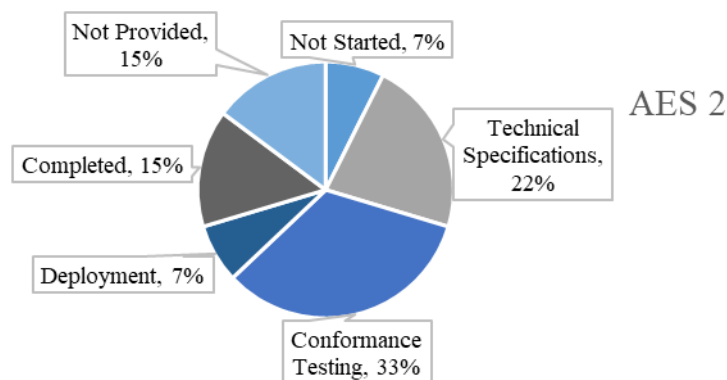


Figure 34: Project Status as per Survey – AES – Component 2

#### 4.1.14 Overview of Project Progress

Table 43 highlights any known divergences in the planning compared to the dates set in the Work Programme. As this project has a deployment window, the ‘Deployment’ and ‘Operations’ columns are shown. If there is a difference in these two dates, this implies that a migration period is planned.

Respondee	Technical Specifications			Conformance Testing		Deployment (Start of the deployment window)			Operations (End of the deployment window)	
	Target date from WP	2022 Planned/ Actual End Date	2022 % of Completion	2022 Planned/ Actual Date	2022 % of Completion	Target date from WP	2022 Planned/ Actual Date	2022 % of Completion	Target date from WP	2022 Planned/ Actual Date
European Commission		Not provided	Not provided	Not provided	Not provided		Not provided	Not provided		Not provided
AT		N/A	N/A	N/A	N/A		30/06/2024	0%		30/06/2024
BE		01/02/2020	Not provided	01/02/2023	Not provided		01/09/2023	50%		01/09/2023
BG		15/08/2022	100%	01/03/2023	0%		28/08/2023	36%		28/08/2023
CY		01/11/2022	100%	27/10/2022	30%		04/07/2023	33%		04/07/2023
CZ		21/10/2021	100%	03/10/2022	80%		03/04/2023	58%		03/04/2023
DE		26/10/2020	100%	18/01/2021	100%		01/10/2021	92%		16/06/2023
DK		01/08/2022	75%	10/09/2022	50%		01/05/2023	50%		30/08/2023
EE		31/05/2022	80%	01/12/2022	20%		30/06/2023	50%		30/06/2023
ES		15/04/2021	100%	18/10/2021	100%		03/10/2022	100%		30/04/2023
FI		07/12/2021	100%	09/01/2023	30%		25/05/2024	33%		21/06/2024
FR		N/A	100%	14/08/2023	0%		02/10/2023	27%		01/12/2023
GR		31/10/2022	50%	02/05/2023	0%		01/12/2024	25%		01/12/2023
HR	31/12/2019	31/12/2021	100%	01/07/2022	100%	01/03/2021	01/01/2023	67%	01/12/2023	01/01/2023
HU		31/01/2023	80%	01/03/2023	0%		30/08/2023	33%		30/08/2023
IE		28/01/2022	100%	13/06/2022	100%		30/01/2023	67%		30/03/2023
IT		15/02/2021	100%	07/02/2022	90%		14/09/2022	75%		01/03/2023
LT		04/05/2023	95%	02/06/2023	0%		01/12/2023	17%		01/12/2023
LU		01/01/2023	Not provided	01/03/2023	Not provided		15/10/2023	17%		15/11/2023
LV		N/A	N/A	27/02/2023	50%		02/10/2023	18%		02/10/2023
MT		N/A	100%	07/03/2023	50%		01/09/2023	44%		01/12/2023
NL		01/12/2021	100%	23/08/2023	100%		03/12/2022	75%		30/08/2023
PL		31/05/2021	100%	02/08/2022	100%		16/01/2023	67%		30/11/2023
PT		15/09/2022	100%	15/03/2023	0%		01/12/2023	50%		01/12/2023
RO		17/11/2022	Not provided	30/05/2023	Not provided		01/09/2023	25%		01/09/2023
SE		01/09/2022	0%	01/10/2023	0%		01/10/2024	36%		20/12/2024
SI		06/04/2021	100%	01/08/2022	90%		01/05/2023	75%		01/05/2023
SK		31/10/2022	95%	15/09/2023	0%		30/11/2023	33%		30/11/2023

Table 43: Comparison of Planned and Actual Dates – AES – Component 1

The deployment of AES shows a delay of 3 quarters in comparison with the initial national plans filed at the end of 2020 (respectively Earned and Planned Value in the figure below<sup>57</sup>). The deployment of AES is currently at 48% (Earned Value) while it should be at 71% (Planned Value). The Member States will speed up their projects and contain their risks to reach the milestones of 1 December 2023.

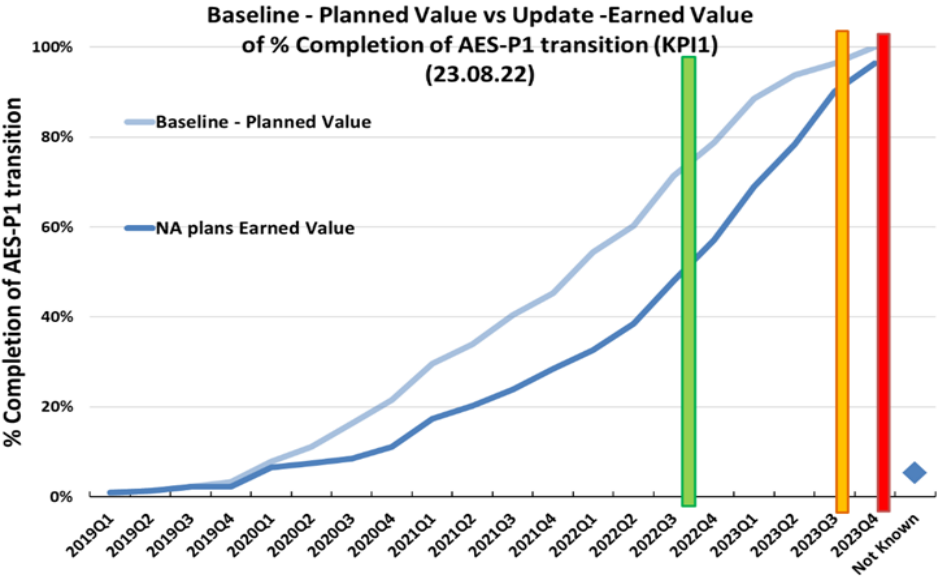


Figure 35: Key milestones: Planned value versus earned value – AES – Component 1

The Figure 36 below shows the percentage of Member States in Conformance Tests. The light grey curve (the planned Value) is the baseline set by the MSs plans end 2020 while the dark purple (the Earned, alias Actual, Value) is the one compiled from the latest national project plans submitted before 23.08.2022.

The figure below shows that the peak of Conformance Tests has shifted by 3 quarters from the baseline of end 2020. The Conformance Tests bells are now skewed to the right in comparison of the baseline, as late-runner MSs will complete their Conformance Tests campaigns during the last quarter of 2023.

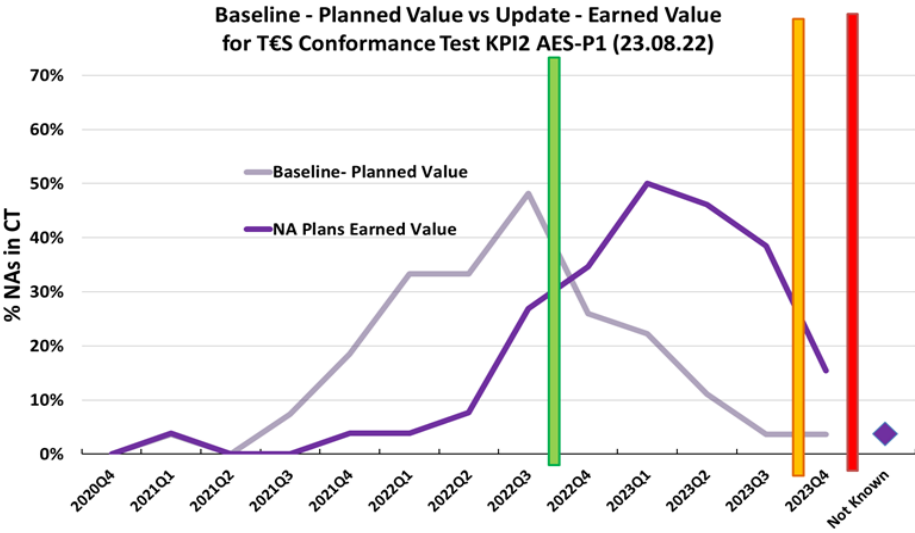


Figure 36: Conformance Tests: Planned value versus earned value – AES – Component 1

<sup>57</sup> The Planned and Earned Values are built on a basket of 12 key milestones across all the Member States

In regards to the implementation **AES – Component 2**, SE has a planned deployment date that is later than the deadline in the UCC Work Programme.

Respondee	Technical Specifications			Conformance Testing		Deployment (Start of the deployment window)			Operations (End of the deployment window)	
	Target date from WP	2022 Planned/ Actual End Date	2022 % of Completion	2022 Planned/ Actual End Date	2022 % of Completion	Target date from WP	2022 Planned/ Actual Date	2022 % of Completion	Target date from WP	2022 Planned/ Actual Date
AT	To be defined by MS	Not Provided	Not Provided	Not Provided	Not Provided	01/03/2021	30/06/2024	Not Provided	01/12/2023	30/06/2024
BE		01/09/2021	Not Provided	01/09/2023	Not Provided		01/09/2023	Not Provided		01/09/2023
BG		14/11/2022	100%	18/08/2023	0%		30/08/2023	0%		30/08/2023
CY		01/11/2022	100%	02/06/2023	30%		04/07/2023	0%		04/07/2023
CZ		21/10/2021	100%	02/04/2023	80%		03/04/2023	80%		03/04/2023
DE		06/03/2021	100%	16/06/2023	Not Provided		06/03/2021	100%		16/06/2023
DK		01/08/2022	75%	30/08/2023	50%		01/05/2023	0%		30/08/2023
EE		31/03/2022	80%	01/06/2023	20%		30/06/2023	0%		30/06/2023
ES		15/04/2021	100%	30/04/2023	100%		22/01/2022	100%		30/04/2023
FI		30/06/2023	100%	30/06/2024	30%		30/06/2024	45%		30/06/2024
FR		13/01/2022	100%	30/09/2023	0%		31/12/2023	0%		01/12/2023
GR		Delayed	50%	Not Provided	0%		31/12/2022	0%		31/12/2022
HR		31/12/2021	Not Provided	31/12/2022	100%		01/01/2023	100%		01/01/2023
HU		31/01/2023	80%	31/08/2023	0%		31/08/2023	0%		01/12/2023
IE		28/01/2022	100%	30/03/2023	100%		31/01/2023	0%		31/03/2023
IT		15/02/2021	100%	30/06/2022	90%		05/09/2022	0%		15/11/2023
LT		04/05/2023	95%	01/12/2023	0%		01/12/2023	0%		01/12/2023
LU		01/02/2023	Not Provided	30/06/2024	Not Provided		30/06/2024	Not Provided		30/06/2024
LV		N/A	N/A	30/09/2023	50%		02/10/2023	75%		02/10/2023
MT		31/03/2023	0%	31/10/2023	0%		15/11/2023	0%		15/11/2023
NL	22/06/2021	100%	30/08/2023	100%	03/12/2022	50%	30/08/2023			
PL	31/05/2021	100%	01/09/2022	100%	16/01/2023	100%	30/11/2023			
PT	31/12/2022	100%	01/08/2023	0%	01/12/2023	0%	01/12/2023			
RO	Not Provided	Not Provided	31/08/2023	Not Provided	15/05/2023	Not Provided	31/08/2023			
SE	01/12/2023	0%	20/12/2024	0%	01/10/2024	0%	20/12/2024			
SI	18/12/2020	100%	28/02/2023	90%	01/05/2023	0%	01/05/2023			
SK	01/01/2023	95%	30/11/2023	0%	01/12/2023	0%	Not Provided			

Table 44: Comparison of Planned and Actual Dates – AES – Component 2

Additional details regarding the specific percentage of completion per milestone can be seen in Figure 36.

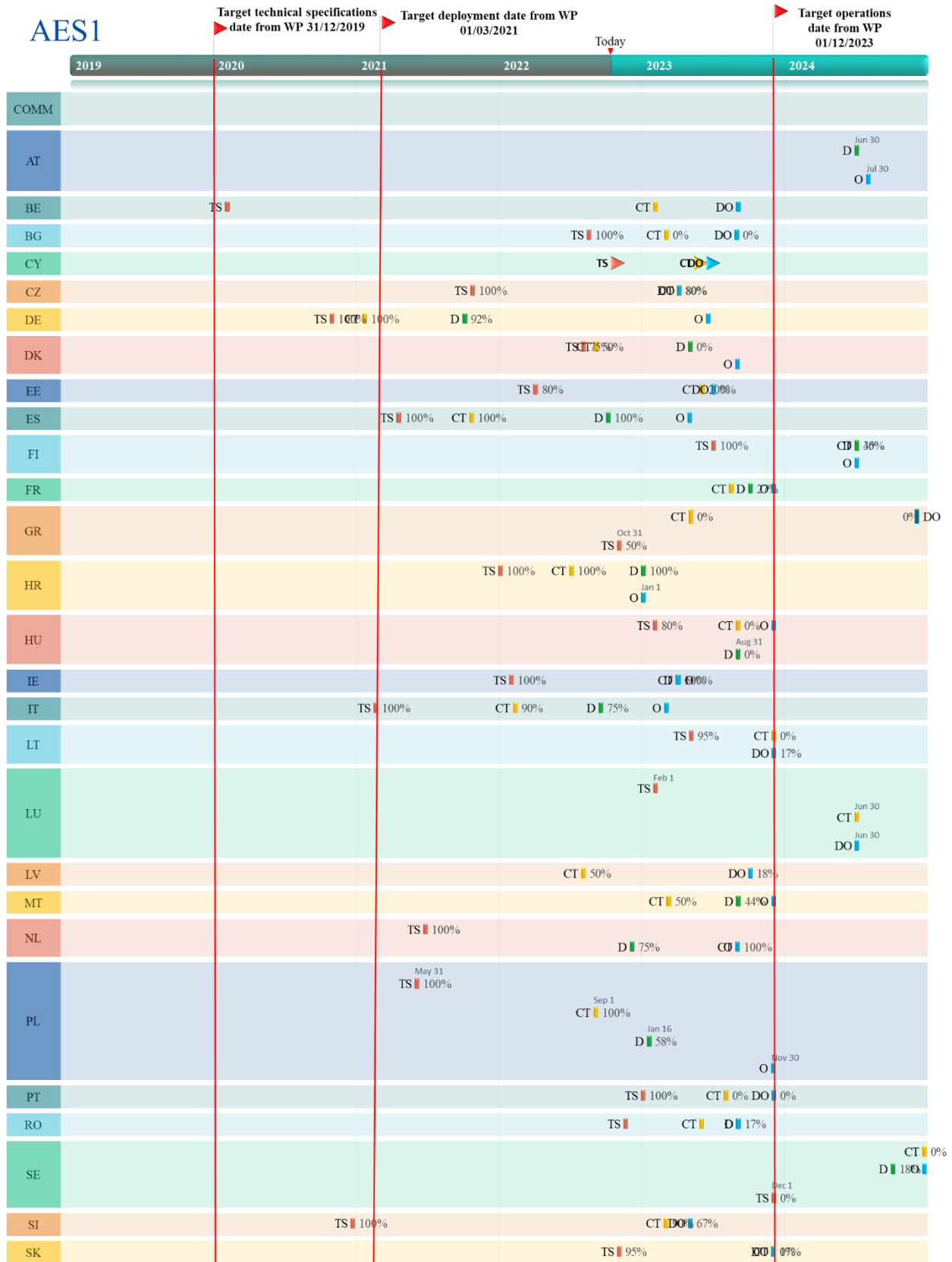


Figure 37: Percentage of Completion per Phase – AES – Component 1

The figure below illustrates the four milestones set in Article 278(a) of the Regulation (EU) 2019/632 amending Regulation (EU) 2013/952 as reported by each Member State in their national plans, ranked by their entry in deployment window for the traders. It illustrates how the deployment window for the trader shortens with its later start, the entry into force of the final provisions of the UCC being a legally set milestone by the UCC work programme.

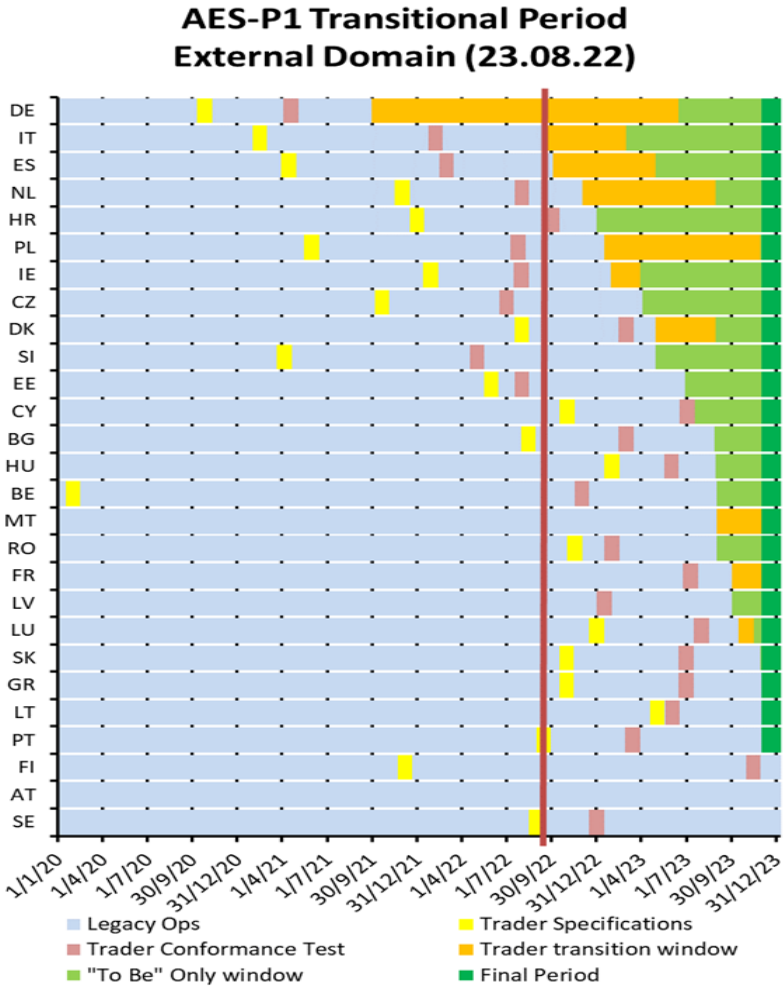


Figure 38: AES – Component 1 Transitional Period

Regarding **AES - Component 2**, additional details regarding the specific percentage of completion per milestone can be seen in Figure 38.

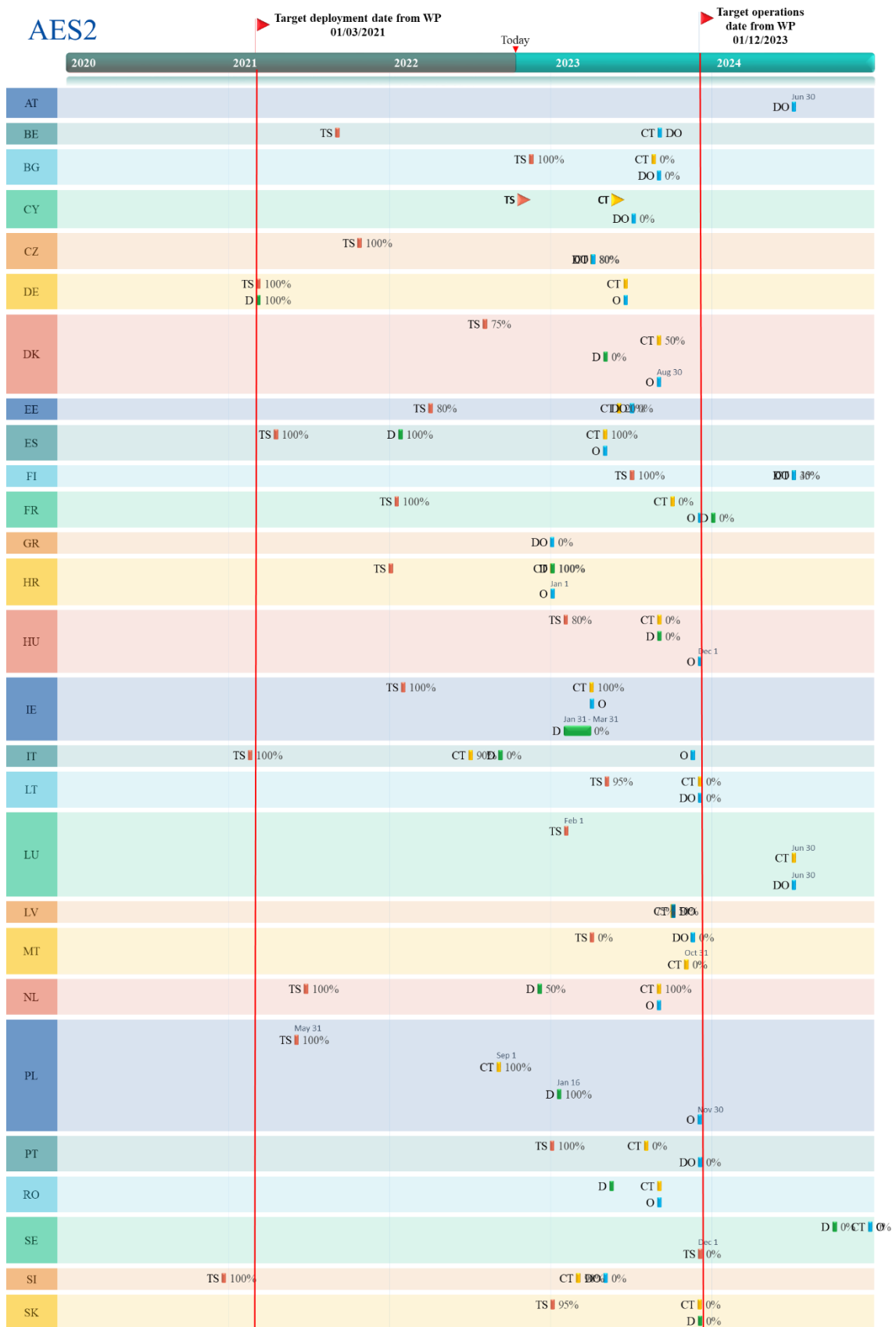


Figure 39: Percentage of Completion per Phase – AES – Component 2

## 5. ANNEX 1 – PLANNING OVERVIEW – UCC WORK PROGRAMME PROJECTS

Figure 39 provides a visual overview of the planning of the UCC Work Programme projects. The overview provides the timeline of the development of the projects. The “N” symbol identifies the national projects. The other projects are related to trans-European systems, which might have a central or decentralised architecture.

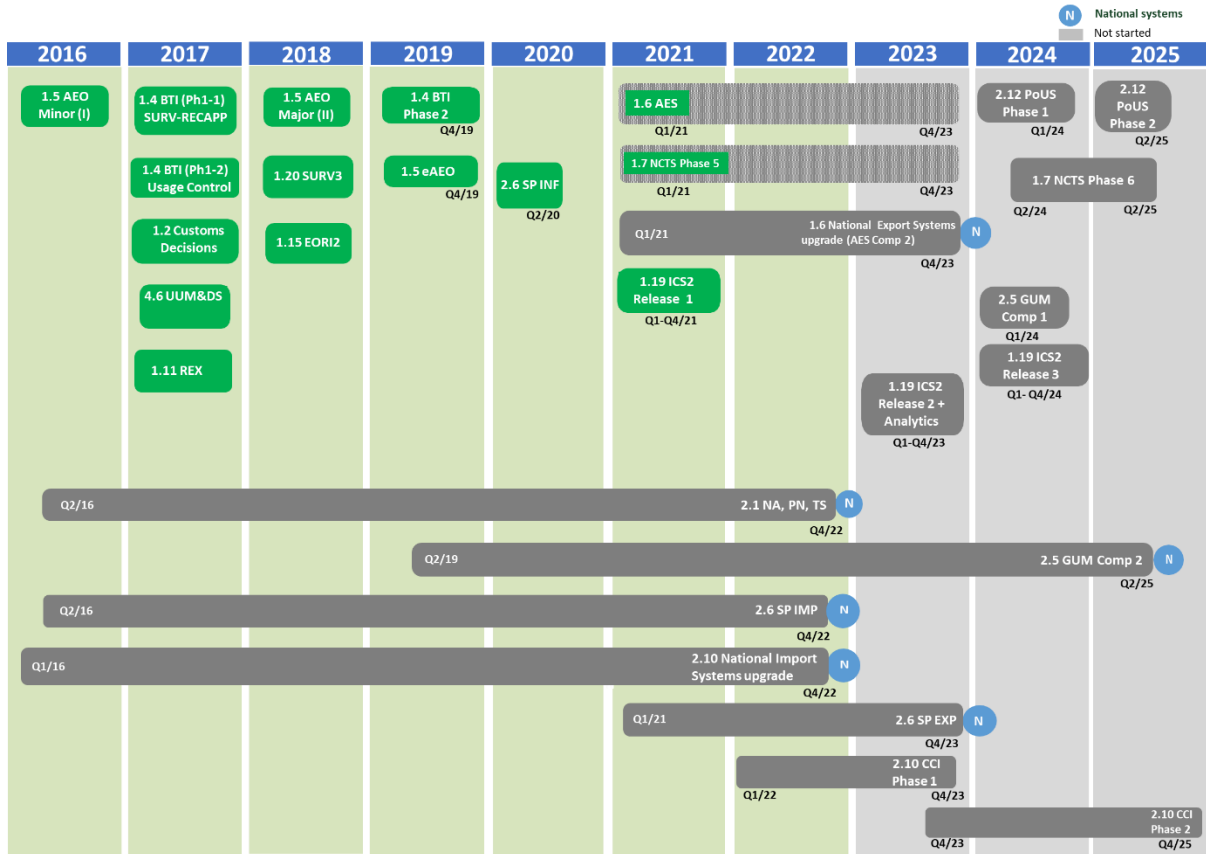


Figure 40: Planning Overview: UCC Work Programme Projects



## 6. ANNEX 2 – ACRONYMS, ABBREVIATIONS & KEY TERMS

Acronym	Description
AEO	Authorised Economic Operator
ADM	Adaptive Development Methodology
AES	Automated Export System
AIS	Automated Import System
API	Application Programming Interface
ATLAS	Automated Customs Tariff and Local Processing Application System
BPM	Business Process Model
BTI	Binding Tariff Information
CAP	Common Agricultural Policy
CBG	Customs Business Group
CCI	Centralised Clearance for Import
CCN; CCN2	Common Communication Network; Common Communication Network 2
CDC	Customs Duties Calculation
CDM	Customs Data Model
CDMS	Customs Decisions Management System
CDS	Customs Decisions System
CGM	Customs Goods Manifest
COM	European Commission
CPG	Customs Policy Group
CRS	Customer Reference Services
CS/RD; CS/RD2	Central Services – Reference Data; Central Services – Reference Data 2
CT	Conformance Testing
CTC	Common Transit Convention
DA	Delegated Act
DDNTA	Design Document for National Transit Application
DDNXA	Design Document for National Export Application
DG TAXUD	Directorate General for Taxation and Customs Union
DMS	Declaration Management System
DTCA	Decision Taking Customs Authority
EBTI	European Binding Tariff Information
ECCG	Electronic Customs Coordination Group
ECS	Export Control System
EIDR	Entry in the Declarant's Records
EMCS	Excise Movement and Control System
EMSW	European Maritime Single Window
ENS	Entry Summary Declaration
EO	Economic Operator
EORI	Economic Operators Registration and Identification
EOS	Economic Operator System
ETCIT	Expert Teams on new approaches to develop and operate Customs IT systems
EUCDM	European Union Customs Data Model
EUCTP	EU Customs Trader Portal
EXP	Export
EXS	Exit Summary Declaration
FTA	Free Trade Agreement
GSP	Generalised Scheme of Preferences
GUM	Guarantee Management
IA	Implementing Act
ICS; ICS2	Import Control System; Import Control System 2

<b>Acronym</b>	<b>Description</b>
IMP	Import
INF	Information Sheet
INF SP	Standardised Exchange of Information for Special Procedures
iOSS	Infinite Open Source Solutions
ITCB	The IT and Cybersecurity Board
ITSC	The Information Technology Steering Committee
LVC	Low Value Consignments
MASP-C	Multi-Annual Strategic Plan for Customs
MS	Member State
MVP	Minimal Viable Product
NCTS	New Computerised Transit System
NIS	National Import System
NES	National Export System
NoA	Notification of Arrival
NSP	National Special Procedures
NTA	National Transit Application
OCT	Overseas Countries and Territories
PDS	Product Disclosure Statement
PG	Project Group
PN	Presentation Notification
Q1/2/3/4	Quarter 1/2/3/4
REX	Registered Exporters System
RPS	Regulatory Procedure with Scrutiny
RUP	Rational Unified Process
SAFe	Scaled Agile Framework
SP	Special Procedures
STI	Shared Trader Interface
T2L	Means of proof of the Customs status of Union goods
T2LF	Means of proof of the Customs status of Union goods for goods transported to, from or between the non-fiscal areas
TAPAS	TAXUD AS4 Profile
TARIC3	Integrated Tariff of the European Communities 3
TP	Trader Portal
TS	Temporary Storage
TSD	Temporary Storage Declaration
UCC	Union Customs Code
UI	User Interface
UUM&DS	Uniform User Management & Digital Signature
VAT	Value Added Tax
WP	Work Programme

*Table 45: Abbreviations and Acronyms*