CBG CCI

Question Dutch Customs (NL)

27 May 2025

Douane
Ministerie van Financiën

CCI questions related to the comprehensive guarantee (CGU)

EXAMPLE

As Is (current situation)

NL trader with authorisations EIR, DPO and CGU for Customs Procedure 40 (release for free circulation), all valid in NL and BE. The total reference amount for CP 40 is € 100k and split in:

- € 70k for NL => this part of the ref.amount is registered in the national NL Guarantee Management System (GUM2) and is validated by the national Declaration Management System (DMS) in NL.

- € 30k for BE => this part of the ref.amount is registered in the national BE Guarantee Management System (GUM2) and is validated by the national Declaration Management System (DMS) in BE.

To be (future situation)

When this NL trader also applies for a CCL authorisation, the question is:

1. Should Geographical Validity (DE 34 04) in the CCL be code 2 'valid in certain MS's' (NL & BE)?

2. Should Geographical Validity (DE 34 04) of the EIR, DPO and CGU still be code 2 'valid in certain MS's'?

3. Should the Total Reference Amount (DE 46 01) of € 100k in the CGU still be split per MS (€ 70 for NL and € 30 for BE)? Because for BE there is no need anymore to register their part of the Total Reference Amount in their national Guarantee Management System (GUM2) if declarations are only lodged in NL.

STATISTICS

CCL authorisations with the number of MS's per Customs Procedure with (out) a multi MS CGU

Conclusion

- In CDMS not all traders with a multi MS CCL (with NL) also have a multi MS CGU (with NL).
- In CDMS not all NL traders witt mulit MS CCL from NL have a multi MS CGU

Number of MS's per Authorisation CCL	CP					Total number of countries	CGU with other MS in Geogr. Val.
AUTH REFERENCE NUMBER	10	31	40	71			
NLCCLNL000568-2019-FRC56673			4			4	national CGU
NLCCLNL000568-2019-IUD56533			2			2	national CGU
NLCCLNL000568-2019-MSA56837	4	4	4	4		16	multi MS CGU
NLCCLNL000703-2019-INC60795	6					6	
NLCCLNL000703-2019-PRQ59198	2					2	
NLCCLNL000703-2019-ZME55705			4	4		8	multi MS CGU
NLCCLNL000707-2019-HGI56659	2					2	national CGU
NLCCLNL000707-2019-JJW55850		2	2			4	multi MS CGU
NLCCLNL000707-2019-TYO61642			3	3		6	multi MS CGU
NLCCLNL00740001094		3				3	national CGU
Total number of countries	14	9	19	11		53	

Number of MS's per Authorisation CCL	CP								Total number of countries	CGU with NL in Geogr. Val.
AUTH REFERENCE NUMBER	10	21	22	23	31	40	61	71		
ATCCLAT930000-2018-ZCN2887	28								28	
ATCCLD5GX113						28			28	
ATCCLD5HFT41	2								2	
BECCLBE000011-2023-D-QLE118662	3								3	
BECCLBE000011-2024-D-CJL136015							2		2	multi MS CGU
BECCLBE000011-2024-D-NUO138225	3								3	
BECCLC2100009							2		2	
BECCLC2100010							2		2	multi MS CGU
DECCL2600Z1000636	5								5	
DECCL2650Z1000001	2								2	
DECCL3200Z1002372	2								2	
DECCL5300Z1000001	2								2	
DECCL5350Z1000003	3								3	
DECCL5550Z1000001	2								2	
DECCL7150Z1000002	3		3	3	9				18	
DECCL7150Z1000004	5								5	
DECCL7150Z1000006	2								2	
DECCL7600Z1000001			3						3	
DECCL7750Z1001477	2								2	
DECCL8750Z1001545	9								9	
DECCL8850Z1000001	2								2	
DECCL9550Z1003068	3								3	
DECCL9550Z1003782			8						8	
DECCL9550Z1003828	5								5	
DECCL9650Z1003446	2								2	
DKCCLDK004700-2021-D-EEH93451	9								9	
DKCCLDK004700-2021-D-PBV93460						13			13	
DKCCLDK004700-2023-D-AVK116561						2			2	multi MS CGU
ESCCL02019000023	3	3	3		3	3	3	3	21	
ESCCL02020000033							4		4	multi MS CGU
HUCCLHU721000-2019-ACW62216	7					7	7		21	
IECCLIENEN003-2024-D-EPK143664						2			2	multi MS CGU
SICCLSI00200624HU46940						13			13	
Total number of countries	104	3	14	6	19	68	3	13	230	

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Wich data must the SCI validate the declaration? 1

EXAMPLE

General questions:

- Which data in the import declaration for CCI must be compared/checked with the CCL authorisation data during validation by the national declaration system?
- Is this check done by the SCI or the PCI?

It is essential that a declaration is checked to see whether it complies with the auhorisation conditions, and which office checks this.

On what data must the SCI validate the declaration? 2

Example for 'Location of Goods' with the comparison between data element 16 15 046 000 'Qualifier of identification' in the declaration and 34 08 010 046 'Qualifier of identification' in the CCL-authorisation.

Two options:
- SCI checks whether the 'Qualifier of identification' in the declaration corresponds to that in the authorisation
- PCI checks whether the 'Qualifier of identification' in the declaration corresponds to that in the authorisation

Why does NL want to know that?:
- if the SCI has to perform this check and NL is the SCI, the NL declaration system must be set up to perform this check in the authorisation system (national interface)
- If the PCI has to perform this check and NL is the PCI, the NL declaration system must be set up to perform this check (this is a simple check, as NL only allows qualifier 'T' or 'Z')