Submitted by International Road Transport Union
NOTE BY THE IRU

Further to initial discussions held during the 125th session of the Working Party on Customs Questions affecting Transport (WP.30) and to the subsequent document ECE/TRANS/WP.30/2010/11 issued by the Government of Turkey, the IRU is pleased to provide, as requested, its position and some practical considerations on this issue, for discussion at the next meeting of the Working Party.

The IRU would like to confirm its support and the support of its Member Associations for the position of Turkey, i.e. to introduce appropriate changes in the TIR Convention in order to increase the number of loading / unloading places up to a maximum of 8 customs offices.

This request appears to be feasible from a technical and practical point of view and the IRU has prepared, as requested by Turkey, a draft layout of the TIR Carnet with an annex which would allow the use of up to 8 customs offices without reducing the space necessary for providing a description of the goods and the termination details.

The enclosed proposal (see Annex 1 and Annex 2) is of course only an initial idea which will, most probably, be improved upon after consideration by the Working Party.

The IRU would like to add that, contrary to the situation observed back between 2001 and 2005, when the issue was first considered by the Working Party, the increase in the number of loading / unloading places now seems to respond to a real need for transport operators worldwide, starting with, but not limited to, the country where the number of TIR Carnets is the highest. This change in trends is probably due to the recent economic crisis, and the current TIR Convention solution, i.e. to use, for example, 2 TIR Carnets for such transport operations, is, from a financial and practical point of view, far from satisfactory.

Moreover, the IRU confirms, for the sake of good order, that the TIR guarantee chain would fully cover such TIR transport with up to 8 customs offices. The IRU considers, based on its recent experience, and on the recent developments in the computerisation of TIR procedures at national and international level, that an increase of up to 8 customs offices should not increase the risks of customs irregularities.
In conclusion, the IRU encourages the Working Party to support the constructive proposal of Turkey and asks the UNECE to make the necessary changes in the TIR Convention. The IRU would be more than pleased to participate in constructive discussions as soon as possible with the Contracting Parties and the UNECE on the most appropriate format for the layout of the TIR Carnet.

* * * * *
Technical considerations regarding the increase in the number of Customs offices (for departure and destination)

- Number of pages: one “20x volet TIR Carnet” allows for 8 places of Departure / Destination involving 4 customs territories. This type of carnet would thus be sufficient for the quasi totality of TIR transport operations concerned.

- Impact on Carnet layout – see Annex 2

- Adding room for additional customs offices in fields 2 and 12 automatically removes some space in other places. Therefore IRU proposes the following changes for discussion and decision by WP.30.

  1. Field 3: size is reduced
  2. For official use only and Field 7: field sizes are reduced and pushed to the right side of the page
  3. The label GOODS MANIFEST (under the original Field 7): becomes diagonal and overwrites fields 12, 11 and 16.
  4. Fields 5, 6 and 8: are pushed to the left side of the page.
  5. Fields 13, 14, 15 and 17: are automatically enlarged. This is very positive for field 17 which contains the stamps of the Customs offices of departure: their number will be increased to 7.
  6. Fields 9, 10 and 11 cannot be enlarged but the use of HS codes instead of complete descriptions could reduce the amount of space required as would the practice of using separate lists.

* * * * *
Annex 2

2. Field 3: size is reduced

3. For official use and Field 7: fields sizes are reduced and pushed to the right side of the page

4. The inscription GOODS MANIFEST (under former field 7): becomes diagonal and overwrites text in fields 12, 11 and 16.

5. Fields 5, 6 and 8: are pushed to the left side of the page.

1. Fields 13, 14, 15, and 17: are automatically enlarged.