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affecting Transport

Informal Ad hoc Expert Group on Conceptual and
Technical aspects of Computerization of the TIR Procedure
(26-27 May 2005)

Activities of the Informal ad hoc Expert Group

The Estonian Comments on Future Projects for the Reference Model of the TIR procedure

Transmitted by Estonia

Estonia warmly welcomes the ExG positive initiative to create the Reference Model of the TIR Procedure which encompasses the future eTIR applications.

We think that the document gives a good overview of the fundamental principles of the eTIR system and ideas for its development and implementation.

We believe that the work done to create the Reference model cannot be underestimated. The work done by the ExG for the analysis of the legal and procedural issues of the TIR procedure is remarkable and the used UML methodology makes the results of the analysis easily understandable and usable in the software development process.

We wish to call attention to the following points in the high level requirements of the eTIR system:

1.   The eTIR system definition (paragraph 1.2.1) states that "the system is devised for the exchange of Customs information related to the international transit of goods, vehicles and containers", but the Reference model covers only the transit of goods. As the transit of vehicles and containers has a lot of specific features that are not clearly

represented, the Reference model has to be complemented. Will it be done during the next step of developing the model?

2. In paragraph 1.2.2.1 the processing of the declaration submitted by a TIR operator via the eTIR central system, especially in the context of acceptance of the declaration by Customs (paragraph 1.2.3), is not very clearly understandable. If the national system of the country of origin does not allow the submission of declarations and the operator uses the eTIR central system to validate the declaration, in which Customs office will the declaration then be accepted? It seems that the situation where the eTIR central system sends the declaration for acceptance to Custom office of deprarture in the country connected to eTIR system is absent among the described declaration methods.

3. The rules for providing the declaration unique identifier (paragraph 1.2.2.2) have to be defined very explicitly, as well as the rules for changing the declarations. If a declaration validated by eTIR central system will be changed, in which cases will the new validation then become mandatory? If the national Customs authorities change a declaration without validation in the eTIR central system, how is the information on changes (data differences between the versions of a declaration) then recorded for the needs of guarantors, enforcement etc.? It seems that this issue cannot be solved by the national Customs alone.

4. Some remarks with regard to the elements composing the declaration (paragraph1.2.2.6):

- The reference on accompanying documents (paragraph 1.2.2.6.6) has to be clarified. We think that for every accompanying document it is useful to have the document code (as codes of certificates in TARIC), document number (with serials etc) and date.

- Prior customs regime (p.1.2.2.6.8) has to be declared with the acceptance number of the Customs declaration of the previous Customs procedure.

Currently the automated customs data processing system ASYCUDA is used for the processing of TIR-Carnets in ETCB. For data exchange with IRU an additional web-based application is used. However, the strategic task for 2005-2006 is development and implementation of a new IT system for Customs declarations processing and for TIR-Carnet processing. Therefore, Estonia wishes the ExG to put in the near future more emphasis on technical specifications and other technical deliverables needed for national authorities to develop their own systems for processing TIR-Carnets within the framework of the eTIR system.