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ECONOMIC COMMISSION FOR EUROPE

INLAND TRANSPORT COMMITTEE

Working Party on Customs Questions
affecting Transport

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

Updates of the Reference Model of the TIR Procedure

**Document ExG/COMP/2004/23: Future projects for the Reference Model of the TIR
procedure**

Transmitted by the European Commission

The following comments represent the opinion of the Commission services.

At the outset it should be stated that we appreciate very much the hard work and effort by the Secretariat in producing such a comprehensive document. However we do not propose to provide a detailed commentary on the document. Our overall impression of the document is that the main principles, as presented, go much further than what is expected of the e TIR system, being a customs system. In our view the document should focus more on the main aspects which are of interest of the customs authorities. Instead the document focuses too much on the provision of IT services for those countries where no IT service exists or, where it does exist, to overcome the missing interlink amongst national systems. This results in the proposal to have a centralised system which in our view should not be necessary.

The management of TIR transactions must remain under the direct responsibility of the national customs administrations. What is of specific interest for each customs office in this TIR context is to ascertain the validity of the carnet TIR presented (or referred to in a declaration) and its use by the proper holder. This validation is expected to be provided by reference to a central official point (in our vision the UNECE Secretariat) and consequently the exchange of this information only between this central official point and the national administration should be considered. The other aspect of supplying declaration data to various offices involved in the TIR transaction is an ancillary tool - and it should be treated as such -and provided only where it is considered necessary, which is not always the case.

In conclusion, the structure of the e TIR system as presented in document No. 23 is quite different from the current TIR system and the proposals are potentially bureaucratic. In addition the document seems to propose a system that would have a major impact on the application of national transit systems which, if this is correct, would not be acceptable to the European Community. In our view the e TIR system should in principle, and to the maximum extent possible, be built on the existing TIR system. In summary it should be based on one building block or database – i. e. for the guarantee management, and where necessary an ancillary one allowing the exchange of data at the international level.

Any further consideration of the proposals by the Expert Group should be made in the light of the comments made in the context of the recently issued questionnaire on e TIR.