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ECONOMIC COMMISSION FOR EUROPE

INLAND TRANSPORT COMMITTEE

Working Party on Customs Questions
affecting Transport

Informal ad hoc Expert Group on the
Computerization of the TIR procedure

Activities of the Expert Group

Reference Model of the TIR Procedure

Introduction

Transmitted by the IRU

**IRU Comments on the Reference Model for the TIR Procedure Computerization Project
(ExG/COMP/2003/1 Draft Version 1.2a)**

A. BACKGROUND

1. Further to the publication of the reports and the homework (review of Annex 1 and Annex 2 of the eTIR Project Reference Model (ExG/COMP/2004/11), some inconsistencies have appeared in the content of the text and between the documents.
2. The Reference Model for the TIR Procedure Computerization Project (ExG/COMP/2003/1 Draft Version 1.2a) could be misleading in several areas. It seems that certain key aspects need to be reviewed following the recent direction given to the project by WP.30. Additionally, the current Reference Model version seems to be ambiguous and confusing, as some chapter titles sound future orientated (“Vision”, for instance), whilst the contents are purely historical and past orientated.

B. THE REFERENCE MODEL

3. This needs to be adjusted to be in-line with the direction given recently by WP.30 which is to take a step-by-step approach to the project. The ExG should consider in the first instance including a) the static (versa the DYNAMIC) data on the Carnet as well as b) the ITDB.

- Static data: Although the ExG has spent considerable time analysing the data on the TIR Carnet, this data has not been classified as static vs. dynamic by the ExG;
- ITDB: The ExG has consistently limited the scope of the project to the data on the paper TIR Carnet. The inclusion of the ITDB into the project expands de facto its scope as the proper use of this data can be of benefit to the TIR System.

C. REFERENCE MODEL'S SECTION 1.1, VISION

4. The title of this section is "Vision", however, while reading its content it does not provide any visionary forward thinking as far as the desired future of the TIR system is concerned. It is essential that a real vision is set out for this project and that the ExG considers including this crucial aspect of the project in Chapter 2, "E-Business Requirements".

D. SECTION 1.1.2, OBJECTIVES

5. It appears that a few objectives might have been excluded from this list and should be reconsidered for inclusion namely:

- Accelerating the discharge procedure and making available the related information;
- Retaining what works well:
 - ⇒ accessibility, low cost guarantee;
 - ⇒ protect existing investments in computer and management systems;
 - ⇒ "one system" for contracting parties (avoid parallel systems);
- Reducing the duration of the availability of the guarantee;
- 100% compliance in the objectives.

E. SECTION 1.1.4, BUSINESS OPPORTUNITY AND PROBLEM STATEMENT

6. It should be clarified to reflect that this is a collection of statements made by WP.30 over several years and does not represent neither the consensus of the ExG nor the situation as it stands today. There are many assertions in this section that are not appropriate and do not reflect the actual mindset. For example, it is said that the TIR carnet:

- is “the weakest link in the TIR transport chain”;
- is a burden for the holders;
- is a significant cost factor in providing the TIR guarantee;
- interferes with effective customs procedures;
- increases the likelihood of fraud.

7. SafeTIR should be cited as a concrete example of “major achievements (...) already obtained...”. Additionally, this section does not reflect any Business Opportunity.

F. SECTION 1.1.7, CONSTRAINTS

8. The document claims that the listed constraints are addressed in the Requirements List of Annex I, but this is not the case.

9. Additionally, a number of key constraints are not included in the list. For example:

- Any data exchange must be mandatory, to avoid the exponential effects of missing or bad data in the short term, and for obvious reasons in the long term when the paper TIR Carnet has been eliminated;
- The Contracting Parties may need to keep records of transactions within their national systems in addition to any “centralized database”;
- There are enormous differences in infrastructure across the Contracting Parties;
- There are enormous differences in resources across the transport industry;
- For the foreseeable future, the paper TIR Carnet will remain the Customs declaration and the physical stamp will remain the approval;
- Because the TIR procedure is a series of national procedures any computerized solution must be flexible enough to let each Contracting Party meet their obligations in their own way;
- Contracting Parties may wish to exchange data on an exceptional basis, rather than 100% of all data;
- We must protect current investments in automation;
- Any legal or procedural amendment may require significant time to be implemented due to national legislation and to the structures impacted (ex SafeTIR).

G. SECTION 1.1.8, STAKEHOLDERS' NEEDS

10. The stakeholders' needs must be documented in this section. Therefore the IRU proposes the following from the perspective of industry:

- Keep the TIR System accessible for new Contracting Parties and small transporters meeting the requirements of Annex 9;
- Ensure the TIR system to be easy to use and competitive in comparison with another means of guaranteeing the delivery of goods to customs office of destination;
- Develop standardized instructions for all the participants of the TIR System with the aim to eliminate disconnected actions and human element causing mistakes while working with the system;
- Facilitate the movement of goods through faster and more standardized Customs procedures;
- Reduce the risk of providing the guarantee by rapidly securing termination and making data timely and available 100%;
- Quickly identify and eliminate from the system those who perpetrate fraud;
- Safeguard data from unauthorized access and occasional damage or loss;
- Increase the level of transparency and confidence between the industry and competent authorities.

H. SECTION 1.2, TIR PROCEDURE DOMAIN

11. This section appears to be out of synchronization with the WP.30 decision. It would be advisable to review this entire section, especially given that the ITDB data is foreseen as a potential for the first step.
