

Minutes of the Customs Products & Processes Joint Customs Consultative Committee Sub Group

Date of Meeting: 24 April 2018

Location: Alexander House Southend

1. Introductions
2. Minutes
3. Action Points
4. E-commerce conference
5. Update from Transit group
6. Trader Education
7. Any Other Business

Annexes

A – List of attendees and apologies

1. Introductions

The Meeting was chaired by Kevin Snow (KS).

KS welcomed members and introduced Tinu Fagbayi (TF), who will be taking over as new Chair from next meeting.

2. Sign off last minutes

KS explained that format of minutes has changed slightly, with the aim of getting the whole JCCC family of meetings more aligned. Also looking at minor revisions of the TOR for this group, which should be ready to be presented to the group at next meeting for agreement.

KS also added that there has been some discussion around the attribution of comments within the minutes. He feels it's useful within this sub-group to continue to attribute comments to individuals, with the caveat that if someone wishes for their comments to remain anonymous then they can be redacted. This will be proposed formally at the next meeting within the new TOR. Trade confirmed that they are happy with that approach.

The minutes of the last meeting were agreed.

NEW AP20 – HMRC to circulate new TOR ahead of the next meeting for comment and discussion at the meeting.

3. Outstanding Action Points from 18 January 2018 meeting

An update was given on the ongoing Action Points



AP10 – 20.04.17 – JMc to look at CCG guidelines regarding reference amounts. Put suggestion forward how to calculate reference amount for comprehensive guarantee for temporary storage. DB Transit does not give value assurance regarding guarantee. AM Carriers from member states, temporary storage / warehousing process, will feedback to JMc and update on next meeting. 18.01.18 – A paper from AM has been circulated to trade.

KS stated that AM's proposal is acceptable to HMRC, but not the only means of getting to reference amounts, anything similar will be acceptable. MW asked that members ensure that trade know the effect it will have on them, rather than just relying on the fact it will be on gov.uk.

NEW AP21 – Trade to disseminate AM's proposal paper on CCG reference amounts for temporary storage as widely as possible. If trade have any queries, then they should get in touch with HMRC.

AP18 – 18.01.18 – HMRC (KS) to arrange an authorisations meeting, to be led by Chris Jones, between trade and central sites.

Meeting was held on 19 February 2018, notes from that meeting have been circulated. GT, LR and HL fed back that it was a worthwhile event, lots of action points came out, but would be useful to know progress on those points. LR pointed out that notes didn't reflect level of frustration that trade feels, but he has started to see progress in how rules are being applied. Working in partnership with HMRC is clearly the way forward.

NEW AP22 – HMRC (CJ) to provide feedback on progress of action points from authorisations meeting.

AP19 – 18.01.18 – Trade (BS) to contact TF about her remaining issues around End-Use.

TF confirmed she had provided a response to BS, which BS confirmed she was happy with. AP discharged.

4. E-commerce Conference

Trade had been provided with a copy of the report from a WCO Global Cross-Border E-Commerce Conference held in Beijing in February 2018. Carol Ashbrook not able to attend, so KS read out summary that she had provided detailing that UK Customs is working with the WCO member customs administrations and trade groups to provide standardisation in the facilitation and control of e-commerce goods.

LR noted that he has corresponded with HMRC on e-commerce, and is pleased to see that CPCs 40 00 C07 and 40 00 004 have been taken off the exclusion list for CFSP, which makes it easier for the trade and also for HMRC, it feels more joined up.

NS concerned about the volume of fraud and abuse from commercial carriers and is working to look at identifying, tracking and ensuring the provenance of goods. Really keen to see some standards, lots of development going on. KS confirmed that considerable work being done in this area. HL queried how this is all linking into the Fulfilment House Due Diligence Scheme? CD reassured that HMRC joined up with colleagues in Indirect



Tax who lead on the Fulfilment House Due Diligence Scheme, and could get someone along to the next meeting from Indirect Tax. NS concerned that UPU not engaging with anyone other than main postal systems. KS suggested that we dedicate 1½ hrs of the next meeting to this area, if sufficient interest, with the key players like Royal Mail invited to come along. He asked that if members are interested they make the Secretariat aware.

AR mentioned having met with border planning group about small parcels, proposed that they should also be invited to meeting. GT expressed an interest in seeing how things will work in postal services in terms of the new inventory requirements, and also would like to see that there is some evidence that the trader can do their postal declaration through their existing system and it would notify CDS directly.

NEW AP23 – HMRC to arrange e-commerce workshop session for first part of July 2018 CP&P sub-group meeting.

5. Update from JCCC Transit Task & Delivery Group

JE gave an update on the meeting that was held on 16 April 2018 and will distribute minutes to the group. Highlights include:

- Moves within the commission to include a 6 digit comm code as part of the Transit data set, OMS interested in that for risk analysis purposes
- The intention to enhance the way we control guarantees and monitor reference amounts within transit.
- WCO released its standard model for transit data at international conference last year. European system well regarded as leader within the world. The WCO European region has a long-term aim of improving transit by sharing data and mutually recognising customs controls but any solution is several years away.

JE proposed that this group is not set up as a Task & Delivery sub-group of the Products & Processes group, instead it should be run on a more independent and informal basis, and will look at where we are in another 6-8 months and may then have another get together. Also invited those in the group keen to be involved in transit meetings to let HMRC know via Secretariat.

GT fed back that the meeting was useful and agreed that the group should be run on a more ad-hoc basis. He also felt it would be useful to have a working group between trade and software developers involved in doing changes to NCTS system. GT suggested there be specific mention of progress on the delivery of Air and Sea simplifications. JE confirmed that the transitional arrangement for Air and Sea simplifications ended on 1st May, meaning all traders wishing to use the simplification from that date would need a UCC approval. The UK had received a limited number of applications but HMRC are coordinating with other member states to make sure applications are approved in time. JE asked that if anyone thinks they know of a trade member who has missed the information on ETD or will want to be involved, then they should get in touch with us. Explained that, whilst legislation suggests that, ideally, transit information should be transmitted electronically, this was not a requirement of the process.

NEW AP24 – Trade to feedback, via Secretariat, if not happy with proposal that ongoing transit group not brought under the overall JCCC umbrella. Trade also to let Secretariat know if wish to be involved in future transit group meetings.



6. Trader Education

Jane Hassan (JH) from Customs Audit Policy Team introduced herself and her role around education, raising awareness, finding out what it is that people want to know, and how HMRC can help people get it right. She explained that they have done tailored education programmes on OSR and undervaluation and are not looking to expand this to a wider range of regimes. She also shared some figures around analysis done on people calling HMRC helplines, and identified that there is clearly a signposting issue on gov.uk. BS pointed out that answers given to people are often too generic, not specific enough. GT would be keen to know if comments written on gov.uk ever go back to anyone. KS clarified that each page has an owner, they get informed if someone comments on their page, and that gives them the opportunity to address the point raised. HL said that he would be happy for JH and team to talk to his members. LR raised issue of HMRC outfield staff not always understanding a lot of the technical information themselves. JH and CD confirmed that we are currently recruiting more ITDLOs.

NEW AP25 – Trade to let HMRC (JH) know (jane.hassan@hmrc.gsi.gov.uk) what they would like education / training on, and what format they would like it to take. Trade to also let HMRC (JH) know of any specific examples of gaps in knowledge, including any incidences where they feel an individual officer may need more education.

7. AOB:

LR queried whether 90 day time limit for and FPO to reclaim import VAT is at all flexible, as some FPOs struggling to meet the deadline when they have non-deliveries that they are returning in bulk. KS clarified that it's a legislative requirement. Key point is that they make a conscious choice to wait until they have a number of parcels they want to send back.

BS queried the time that it's taking for CCG applications to be processed. She is finding that her members are sometimes submitting applications and then not hearing anything for about 6 weeks, or until they chase. KS noted comment for CJ to include in general feedback from authorisations group. BS questioned whether staffing levels are sufficient in authorisations teams? KS pointed out that the more stages of feedback that are required, the more resource it uses, but obviously an applicant needs to know that their application has been received.

NEW AP26 – HMRC (CJ) to communicate to trade what is happening with timings on authorisations process.

BS brought up that a regulation was published recently on suspension of duties for aircraft airworthiness, now including goods that are in need of repair. KS said he would get JE to look into this. CD commented that we would need to do a CIP on it.

NEW AP27 – HMRC (JE) to look into producing a CIP for updated regulations on suspension of duties for aircraft airworthiness.

AR mentioned that one of their members had been contacted by the Medical Health Regulation Authority seeking for HMRC's presence with customs knowledge at their round table panel of logistics associated with the international shipping of gene therapy

materials. KS has already received email about this, suggested putting up someone from both HMRC and BF. AR confirmed dates as w/c 10 Sept.

NEW AP28 – HMRC (KS) to forward Medical Health Regulation Authority request email to DHu who will source relevant person.

GT, on behalf of JCCC members, thanked KS for his support and job he has done for the JCCC over the years.

Meeting finished at 12pm.

Next meeting will be **24 July 2018 – Euston Tower, London**

KS conveyed importance of confirming and bring photographic ID for Euston Tower.

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AP21	Trade to disseminate AM's proposal paper on CCG reference amounts for temporary storage as widely as possible. If trade have any queries, then they should get in touch with HMRC
AP22	HRMC (CJ) to provide feedback on progress of action points from authorisations
AP23	HMRC to arrange e-commerce workshop session for first part of July 2018 CP&P sub-group meeting
AP24	Trade to feedback, via Secretariat, if not happy with proposal that ongoing transit group not brought under the overall JCCC umbrella. Trade also to let Secretariat know if wish to be involved in future transit group meetings
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Annex A – List of Attendees April 2018

Chair

Kevin Snow (KS) – HMRC

Secretariat

Deborah Hill (DHil) – HMRC

Outside organisation attendees

Association of Freight Software Suppliers (AFSS) – Gordon Tutt (GT)

Association of International Courier and Express Services (AICES) – Adrian Robson (AR)

British International Freight Association (BIFA) – Pawel Jarza (PJ)



HM Revenue & Customs

Customs Practitioners Group (CPG) – Barbara Scott (BS)
DHL – Mark Redding (MR)
Export Group for Aerospace, Defence and Dual-Use – Gary Charles (GC)
Grosvenor – Lorenzo Rossetti (LR)
Institute of Chartered Shipbrokers – Robert Hill (RH)
Mail Carriers Association (MCA) – Lee Bucktrout (LB)
Mail Carriers Association (MCA) – Nicholas Street (NS)
Pentant – Mark Phippen (MP)
Society of Motor Manufacturers & Traders (SMMT) – Howard Levene (HL)
Velta International Ltd – Alonso Mrabety (AMr)

HMRC attendees

Rachel Ademosu (RA)
Hazel Batter (HB)
Colin Davis (CD)
John Evans (JE)
Tinu Fagbayi (TF)
Jane Hassan (JH)
Mohammed Hoque (MH)
Mohammad Islam (MI)
James Leigh (JLe)
Jane McCain (JMc)
Lyn Norton (LN)
Sham Sisodia (SSi)
Mike Walton (MW)
Sue Yoxall (SY)

Other Government Departments

Border Force - David Huke (DHu)
Border Force – Ian Tucker (IT)

Apologies

Acushnet Europe Limited – Mark Emerson (MEEm)
Adidas Group – Samantha Gartside (SG)
Agency Sector Management (ASM) – Peter MacSwiney (PMcS)
Airline Operators Committee for Cargo UK (AOCC) – Andy Miller (AM)
Boots – Karen Coventry (KC)
British Ship Suppliers Association – Arne Mielken (ArM)
Descartes Systems Group – Martin Meacock (MM)
DHL – Steve Parker (SP)
Dnata – Lawrence Cockburn (LC)
Dnata – Gary Morgan (GM)
Dnata – Alex Doisneau (AD)
Felixstowe Dock & Railway Company (FDRC) – Rob Kirk (RK)
Jabil – Ruth Maciver (RM)
Maritime Cargo Processing (MCP) – Alan Long (AL)
Road Haulage Association – Duncan Buchanan (DB)
Scotch Whisky Association – Siobhan MacLennan (SMa)
Seafish – Ivan Bartolo (IB)

HMRC

Adil Asghar (AA)
Carol Ashbrook (CA)



HM Revenue
& Customs

Darren Bradbury (DB)
Joanne Cheetham (JC)
Cathryn Collins (CC)
Chris Jones (CJ)
John Mitchell (JMi)
Sukhbir Panesar (SP)
Tessa Robins (TR)