



5 August 2013

HM Revenue and Customs  
Balance of Competences Review, 3E10  
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Dear Sir Madam

**Review of the Internal Market: Free Movement of Goods; including the EU Customs Union and Intellectual Property Rights**

We welcome the opportunity to feed into this Review. The British Ports Association represents over 90 port authorities and a number of terminal operators located throughout the UK, almost all of which will, to varying degrees, experience HMRC activity within their ports. The Association is committed to reducing border controls as performed by a number of Agencies and Government Departments and we therefore welcome this initiative. We have decided not to specifically respond to the questions but instead to make some short general points. We have no remit or expertise in the field of intellectual property rights and therefore this response is focused on the customs aspects of the Review.

We are not a political organisation but there has been positive feedback from our members about their experiences in relation to the harmonization of customs regimes within the EU. As identified in part in the 'call for evidence', more than half of the UK's international freight enters/leaves the country to the EU. Much of the UK's non-European sourced/bound freight is also transported on vessels via the EU as well. The main benefits of the Customs Union has been to increase the efficiency of the transport network through developing compatible systems and regimes so that movement from one member state to another is not subject to delay and excessive bureaucracy. The Internal Market has therefore helped to improve transport and logistical efficiencies and reduce costs for transport operators and UK businesses.

The main concern we have are that much of the UK customs laws were written before the development of the Common Market. The HMRC published draft legislation to modernize UK customs laws in 2011, of which we were generally very supportive, however until now no Parliamentary time has been found for this. We would strongly urge the HMRC to revive this legislation so that more of the benefits of the EU's Customs Union could be realised.

Finally as well as supporting greater customs alignment we also support cross-border initiatives which look to streamline checks and controls. For example the principles of the Blue Belt initiative and indeed any measures, including immigration measures, which could

reduce controls at borders and facilitate the movement of people and freight between member states, are particularly attractive and would have real economic benefits. Blue Belt unfortunately faced some practical challenges but it did not appear to have been particularly well embraced by HMRC so we would encourage improved UK involvement in any follow-up initiatives.

Yours sincerely



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