



## **Action Plan « Taking the Customs Union to the next level**

Dear Sir or Madam,

thank you very much for the opportunity to give feedback on the Action Plan “Taking the Customs Union to the next level “.

On behalf of the Union of Finance Personnel in Europe (UFE), which is the only organization representing the interests and views of 400.000 tax and custom officers throughout Europe, I would like to give feedback as following:

UFE welcomes the action plan of TAXUD concerning the future of the customs union.

For many years, UFE members have been fighting for the harmonization of custom rules applied within and on the borders of Europe.

Unfortunately, if all the European customs administrations enforce the same laws, they diverge not only in the application and in interpretation of these laws, but especially regarding the application of material and human resources entrusted to the civil servants responsible for applying enforcing Customs Law.

A customs documentary or physical check does not have the same meaning and intensity throughout Europe, the sanctions in the event of fraud are not harmonized, so the protection of the financial interests of Europe is not identical in every part of the European territory.

Our association continues to call for the definition of common rules for controls and sanctions, and continues to demand minimum standards of control.

**A survey** among UFE member unions revealed, **that it will be hard to apply common rules, if the number of customs officers per 100,000 inhabitants varies from 7 to**

**more than 70 depending on the Member State** and if the number of customs officers per 10,000 declarations varies from 2 to more than 40 per member state.

Therefore, UFE would highly welcome a minimum standard in staffing of national custom authorities. We would like to emphasize, that in some countries, custom authorities are also responsible for other tasks than enacting custom laws (eg: the German custom authorities control minimum wages and fight against employment within the shadow economy). There should be a common description of the work of a Customs Officer.

The recent terrorist or health risks reinforce the need for a more unified Europe.

UFE is calling for integrating into the projects the reassessment of the means of control devolved to OLAF, alongside the development of the European Public Prosecutor.

CUSTOMS coordinated controls must be increased in order to avoid member states becoming complacent.

UFE considers it very important to highlight the difference between administrations and the divergence of approach in relation to sanctions for customs fraud, intensity of control and most importantly the human and financial resources assigned to customs enforcement and in particular the health and safety of our members.

TAXUD can count on the support of UFE and all its affiliated members for any initiative that consolidates the missions and objectives of our professional association of custom and tax officers in Europe.

We remain at your disposal to discuss these important projects.

Sincerely,



Florian Köbler  
UFE President