

**COM/2023/258 Proposal for a Regulation establishing the Union Customs Code and the European Union Customs Authority, and repealing Regulation (EU) No 952/2013**

**Consultation Response – British International Freight Association**

**Impact of EU Act**

**1 Does it appear likely that the proposed EU act would have a significant negative impact specific to everyday life of communities in Northern Ireland in a way that is liable to persist?**

Yes

**Tell us why :**

The regulation introduces a number of significant trade policy and customs law changes likely to disrupt trade flows between GB and NI and also NI and ROW. the regulation is too ambitious in its scope and doesn't appear to deliver any improvements over the current legislation.

**2 Does it appear likely that NOT APPLYING the proposed EU act would have a significant negative impact specific to everyday life of communities in Northern Ireland in a way that is liable to persist?**

No

**Tell us why:**

The disruptive nature of the regulation means that not applying the proposed act wouldn't have a significant negative impact.

**3 Are there any other matters regarding the proposed EU act that you wish to draw to the Committee's attention? Please note, any information provided should be of an evidential nature rather than a commentary.**

Yes

**Tell us why :**

The proposed act relies heavily on the assumption that data alone can be used to tackle procedural difficulties associated with moving goods across borders which is an untried solution based on very theoretical grounds. Further consultation with trade is required in order to arrive at more pragmatic solutions.