

ECASBA BULLETIN

January 2025

ECASBA Advisory Panel Confirmed for the 2024-2027 term

The Chair of the Committee is Mr. Raymond Troch, please email him at rtroch@fonasba.org

The Vice-Chair for ECASBA : Mr. Jacek Tyminski

Please find below the details of the AP members:

- Belgium : Mrs. Hilde Bruggeman, hilde.bruggeman@bsv-bsf.be
- Denmark : Mr. Jesper Sebbelin, jese@di.dk
- France : Mr. Jean-Pascal Bidoire, contact@amcfrance.org
- Germany : Mr. Alexander Geisler, info@schiffsmakler.de
- Hungary : Mr. Botond Szalma, bszalma@fonasba.org
- Portugal : Mr. Antonio Belmar da Costa, abelmar@fonasba.org
- Poland : Mr. Jacek Tyminski, j.tyminski@vetro-shipping.pl
- Spain : Mr. Julio Fernández Guillén, info@asecob.org

SafeSeaNet / EMSW

Please see the below note received by the colleagues at Danish Shipbrokers and Port Operators (DSPO), before Christmas. The EU Commission has issued the below regarding the upcoming implementation of the system to replace SafeSeaNet. Throughout the process, DSPO have been vocal about their concerns for the tight timeline set for August 2025. Therefore, from a timing perspective, the below is positive for the upcoming project in the MS.

Quote by the EU Commission:

"On the Member States' side, while some Member States have gradually started the implementation activities under their responsibility, others are advancing more slowly than originally planned, considering also the delays described above. It is expected that implementation will not be synchronised between Member States and will take place indicatively over a period of up to 18 months as from the application date in the EMSW Regulation set on 15 August 2025.

The Commission will continue monitoring the implementation of the Regulation using surveys and close collaboration with the National Coordinators.

The Commission will also support Member States at a technical and business level to ensure that the common components and central services in all MNSWs are integrated and tested correctly and promptly."

EU-lisa / EES & ETIAS

Again, an update from Denmark about the EU-lisa status. Early in December, Jesper Sebbelin participated to the meeting for Sea Carriers concerning EES and ETIAS.

During the meeting, participants were informed that a politically supported announcement from the European Commission regarding the possibility of a Progressive Approach is forthcoming. In practice, this means that Member States will have different Go Live dates for EES and ETIAS. We could not obtain further information other than that EU-lisa will communicate the official announcement from the European Commission when it becomes available.

In the meeting DSPO asked EU-lisa about a definition of the “Go Live Spring 2025”, and the closest they could get to an answer was the **2nd quarter of 2025**. This prompted relevant remarks about the high travel season during Easter and the subsequent summer period. EU-lisa could not provide specific details but claimed to be aware of this fact.

Update on 10.01.2025. The EU Council and Parliament are still negotiating the proposed Regulation for a Progressive Approach for the EES start-up. Consequently, we still have no indication on the start date of the Progressive Approach period.

DG TAXUD - Customs Reform

The European Commission’s Political Guidelines and strategic priorities highlight the imperative for Europe to enhance both its competitiveness and its security. Both are intertwined at the border. Getting EU Customs Reform right has never been so important or so urgent.

The EU customs reform should ensure that the external border facilitates trade and functions as a conduit for competitiveness while preventing economic inefficiencies. SmartCustoms reform must increase the EU’s security and protect its citizens without compromising legitimate trade. These goals can only be achieved with a customs union that is modern, acting as one and in partnership with the private sector.

In order to have the new customs legislation work effectively for both customs as well as for trade, together with all our longstanding partners in our EU maritime cluster, we have co-signed the statement available here: https://www.fonasba.com/wp-content/uploads/2025/01/Joint-Statement-on-the-EU-Customs-Reform_DEC2024-1.pdf

In the statement were highlighted the following:

- ◆ Completion of the current Union Custom Code [UCC] legislation
- ◆ The EU Customs Data Hub and future customs related IT developments
- ◆ The EU Customs Authority
- ◆ Trust and Check Trader
- ◆ Ownership of data and the linked responsibility is a key element in the changed environment.
- ◆ Customs Infringements and Sanctions
- ◆ Temporary storage
- ◆ Recommendations on the harmonization of customs and other related legislation
- ◆ Involvement of Trade

On 11th December, ECASBA representatives participated in [Brussels](#), in the event organized by the Federation of Polish Entrepreneurs ([Federacja Przedsiębiorców Polskich](#)), 'A Level Playing Field Through a Green Lane for Compliant Trade.'

The event focused on the latest developments regarding the EU TAXUD Reform and also provided an opportunity to strengthen relations with FONASBA's key partners, including [European Community Shipowners' Associations \(ECSA\)](#), [ESPO \(European Sea Ports Organisation\)](#), [FEPOR](#), and [World Shipping Council](#).

Distinguished speakers included Magdalena Rzeczkowska, Director of the Federation; [Dirk Gotink](#), Member of the European Parliament; [Gerassimos Thomas](#), Director General for Taxation and Customs Union (DG TAXUD), among others.

Special thanks to the Federation of Polish Entrepreneurs and all the speakers who made this event successful and filled with engaging discussions and valuable points of debate.

Environment - carriage of plastic pellets by sea in freight containers

This information concerns measures for carriers that carry plastic pellets by sea in freight containers.

Mrs Hilde Bruggeman, our colleague from NAVES, Belgium, kindly shared the following details. At present these are still recommendations in the form of an IMO circular, but they will probably soon become hard obligations through both the IMO and Europe.

It also indicates how agents can already be confronted with this matter when receiving booking requests.

On 19th April 2024 IMO published a circular with (non-binding) recommendations for the carriage of plastic pellets by sea in freight containers ("RECOMMENDATIONS FOR THE CARRIAGE OF PLASTIC PELLETS BY SEA IN FREIGHT CONTAINERS") – Circular "MEPC.1/Circ.909".

<https://wwwcdn.imo.org/localresources/en/MediaCentre/HotTopics/Documents/MEPC.1-Circ.909.pdf>

These recommendations are, in summary, the following:

- par. 1.1. : plastic pellets should be packed in good quality packaging which should be strong enough to withstand the shocks and loadings normally encountered during transport (to prevent loss).
- par. 1.2. : the transport information transmitted to the sea carrier should clearly identify the freight containers containing plastic pellets and a specific stowage request must be formulated (cfr. par. 1.3.).
- par. 1.3. : freight containers containing plastic pellets should be properly stowed and secured so as to minimize the hazards to the marine environment without impairing the safety of the ship and persons on board; in concrete terms, this means that these containers should be

stowed under deck (wherever reasonably practicable) or inboard in sheltered areas of exposed decks (to prevent pellet loss at sea).

IMO is already asking Member States to use these recommendations and bring them to the attention of shippers, manufacturers, terminal operators, shipowners, ship operators, charterers, shipmasters and all other parties concerned,.

Further discussions will take place within the IMO in the course of this year, during which a proposal will be drawn up for mandatory measures.

Furthermore there are also initiatives at the European level to make the recommendations contained in the IMO circular mandatory through a Regulation.

This regulation will apply at all stages of the supply chain to:

- economic operators handling plastic pellets in quantities above 5 tonnes in the EU
- EU and non-EU carriers transporting plastic pellets in the EU
- companies in charge of cleaning plastic pellet containers and tanks (added by the Council in its general approach)
- shippers, operators, agents and masters of sea-going vessels when leaving or calling at a port of a member state (added by the Council in its general approach)

The new obligations are stated as follows:

- For EU carriers and non-EU carriers, to implement certain actions in accordance with Annex III (see attachment);
- For installations and EU carriers, to train their staff;
- For installations and EU carriers, to monitor and keep records of their relevant implementing actions including, where appropriate, adopting corrective actions, and of the estimates of pellet losses as well as to address significant plastic pellet incidents and accidents;

For the full text, see : <https://eur-lex.europa.eu/legal-content/EN/TXT/DOC/?uri=CELEX:52023PC0645>

What to be expected already today?

The American Chemistry Council has collaborated with the associations CEFIC (European Chemical Industry Council), Plastics Europe and DGAC (Dangerous Goods Advisory Council) and affiliated companies to develop recommended guidelines for shippers in order to already implement paragraphs 1.1 and 1.2 of the MEPC circular (see above) in advance, whereby the following was agreed:

1. Use of the code “PLA” on the booking request and transport document.
2. The booking request should also include the following declaration statement:

“Freight container contains plastic pellets in accordance with paragraphs 1.1 and 1.2 of IMO Circular MEPC.1/Circ.909 and is subject to proper securement and stowage under deck

wherever reasonably practicable, or inboard in sheltered areas of exposed decks (in accordance with paragraph 1.3 of that Circular).”

Or abbreviated

“Contains PLASTIC PELLETS as per MEPC.1/Circ.909 (para. 1.1 and 1.2). Freight container subject to securement and stowage under deck or inboard in sheltered areas of exposed decks (para. 1.3).”

3. As a potential longer-term solution, the special stowage request field in an EDI transmission could (or should) use the code “PLA”.”

WCO PSCG (Private Sector Consultative Group)

We have received the presentation about the TCG work [<https://www.fonasba.com/wp-content/uploads/2025/01/TRADE-CONTACT-GROUP-TCG-presentation-13-December-2024-2.pdf>] and below update from our WCO rep, Hilde Bruggeman, GM at NAVES VZW in Belgium:

* Provisional schedule for TCG meeting in 2025: 19/3/2025, July and October

* WCO modernization, and support plans of EU in this respect. For anyone participating in the WCO meetings it soon becomes clear that the stage of customs developments differs greatly depending on part of the world you are looking at. So the 'regional reform" seems to be of particular interest.

+++++

We will monitor these topics further and keep you duly informed.

15th January 2025