

Position of ESPO on the implementation of RFD 2010/65 (1)

View: RFD is opportunity for:

- Facilitating trade
- Easing administrative burden through harmonisation and standardisation

Concerns:

- General confusion
- Lack of harmonization

Priorities ESPO:

- PCS as entry points to NSW
- Use existing messages and standards
- Agree on scope on EU level (DG MOVE and DG TAXUD)
- Support data transmissions in all relevant technologies
- Include in national implementation: “all relevant national legislation”
- A unique ship identifier needed urgently
- Consider postponement to allow for better preparations / more time is needed for proper implementation.

Position of ESPO on the implementation of RFD 2010/65 (2)

Recommendations:

- AnNa has to follow eMS guidelines, principles and recommendations;
- Focus on supporting data transmission in all relevant technologies (EDIFACT, XML);
- Use appropriate “converters/translators” where needed