



25 February 2008

***Joint Statement***

***Proposed Reform of EU Preferential Rules of Origin:***

***European Trade and Industry oppose  
Origin Certification by Pre-Registered Exporters***

Representing a wide range of trade and industry operators throughout the EU, we wish to re-iterate once again our strong objections to the rebalancing of the rights and obligations of operators and administration and to the certification of origin by accredited exporters in the origin country, as proposed by the European Commission in the draft Regulation amending the rules of origin under the EU Generalised System of Preferences (GSP).

European importers import their products based on a well-established documentary system carefully elaborated over a long time period and formalised in international conventions and treaties. The proposed change in origin certification would reduce legal certainty as to the origin of the product and would make European importers even more liable for an origin declaration than in the present system, as they have no possibility to ensure control or receive adequate guarantees of the origin from exporters.

This fundamental lack in predictability and legal certainty would constitute a major obstacle, especially for Small and Medium Enterprises, to opt in the future for imports from countries benefiting from the Generalised System of Preferences and other preferential trading schemes. Consequently, the proposed changes in origin certification will contribute to depriving the EU preferential trading schemes of their development function and will contradict the general policy objective of the European Communities of developing a sustainable and competitive environment for Small and Medium Enterprises as expressed in the Lisbon Agenda.

We thank you in advance for raising our points of concern in your written comments to the European Commission and in the discussions on the proposed draft Regulation within the Customs Code Committee.

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AEDT	European Association of Fashion Retailers
AIPCE-CEP	Association des Industries de Poisson de la CE Comité Import/ Export Poissons
CIAA	Confederation of the Food and Drink Industries of the EU
CELCAA	European Liaison Committee for the Agricultural and Agri-Food Trade
COCERAL	The voice representing the European cereals, rice, feedstuffs, oilseeds, olive oil, oils and fats and agrosupply trade
EUCOLAIT	European Association of Dairy Trade
EUROCOMMERCE	The European organisation of retail, wholesale and international trade in 29 European countries
FENA	European Federation of Furniture Retailers
FERM	Federation of European Rice Millers
FRUCOM	European Federation of the Trade in Dried Fruit, Edible Nuts, Processed Fruit & Vegetables, Processed Fishery Products, Spices, Honey and Similar Foodstuffs
UECBV	European Livestock and Meat Trading Association