Guidance Note on Enhancing Data Quality and Information Exchange for the EU ICS2 regime

European Union ICS2 Requirements

New requirements for the advance notification of shipments of goods entering or transiting the EU Customs Territory (EUCT)* take effect during 2024 and 2025. The EU's Import Control System 2 (ICS2) is being implemented for all shipments entering the EU by sea, road and rail transport. Requirements for shipments arriving by air were fully implemented during 2023.

The extension of ICS2 to sea, road and rail (known as ICS2 Release 3) will make shippers and forwarders exporting to the EUCT responsible for the provision of more detailed information about each consignment. This information must be presented to the carrier, the import agent, or submitted directly by an authorised freight forwarder to the ICS2 system, by a specified time before the goods are loaded or arrive at the EU border, depending on the mode of transport and the type of journey. Further details are available at the official EU ICS2 website.

The purpose of the ICS2 requirements is to allow EU Customs authorities to make risk assessments of each consignment of goods entering and transiting the EUCT using the data provided, to protect the safety and security of European citizens and protect the EU's Single Market. Failure to provide the required information, in the right level of detail and by the specified deadline will result in delays and possible enforcement actions by EU Customs authorities. It is therefore essential that shippers and forwarders making exports or imports to the EUCT co-operate to ensure the required information is provided in the format and timeline required.

About this Guidance Note

The International Federation of Freight Forwarders Associations (FIATA) and the Global Shippers Forum (GSF) **emphasise the importance of collaboration between shippers and freight forwarders to ensure the submission of high-quality data** throughout the supply chain, especially for advance cargo information regimes like ICS2, in order to facilitate cost-effective and timely compliance whilst strengthen global aviation, maritime, road and rail transport security standards.

This document emphasises the importance of data quality, underlines the necessity for accurate goods description and Harmonised Commodity Codes (HS Codes), and provides guidelines for the submission of essential information for the EU Import Control System 2 (ICS2). This document addresses shippers, consignors and freight forwarders of goods that will enter or transit the EU Customs Territory **by air, by sea (from June 2024)** or by road or rail transport **(from April 2025). See timeline graphic on page 4.**

The ICS 2 requirements will apply to any goods being imported into, or transiting through, the 'EU Customs Territory' which includes the following countries and territories: Austria, Belgium, Bulgaria, Croatia, Republic of Cyprus, Czech Republic, Denmark, Estonia, Finland, France, Germany, Greece, Hungary, Ireland, Italy, Latvia, Lithuania, Luxembourg, Malta, Netherlands, Northern Ireland, Norway, Poland, Portugal, Romania, Slovakia, Slovenia, Spain, Sweden, Switzerland.

Why accurate compliance is crucial

Accurate data entry is essential to meet legal and regulatory obligations. Submitting incorrect or inaccurate data, as well as missing data elements, may lead to:

- rejection of declarations or interventions by customs authorities, leading to possible sanctions for non-compliance;
- consignments being stopped or delayed at customs requiring rescheduling of the transport;
- enhanced security screening measures; and/or
- transport delays and disruptions.

Any of these actions will result in additional costs to supply chain stakeholders and to regulators!

Checklist for the EU ICS2 requirements

Recommended Actions for Shippers:

☐ Recognise your responsibilities as the consignor of goods to provide information regarding the consignment to other parties in the supply chain.

☐ Agree and establish reliable communication channels and clear protocols for information exchange with your freight forwarder(s) or carrier(s).

☐ Ensure that information you provide for your identity as the consignor of the goods meets ICS2 standards, by including your:
- Registered business name;
- Full postal address from where the goods originated; and
- Your EORI number, if the business has one.

☐ Ensure that the information you provide for the identity of the consignee in the EU meets the required levels of detail by providing the:
- Registered business name
- Full postal address in the EU, including postal code to which the goods are consigned
- The EORI number of the consignee (all trading entities in the EU and the UK should have an EORI number. Where no EORI number is available, shippers may provide the Tax Identification Numbers (e.g. UID for Switzerland). They are not assigned in Norway).

☐ Provide accurate and acceptable goods descriptions for each article of the consignment to meet the EU required levels of detail. Avoid generic descriptions and brand names and avoid referencing accompanying documents. The description should be clearly and plainly stated, covering the following elements:
- What the goods are;
- What they are made of; and
- What they are intended for.

Check the full EU Guidance on acceptable and non-acceptable terms for the description of goods **here**.

☐ Include a Harmonised Commodity Code (HS Code) with a minimum of the first 6 digits of the HS Code for each article of the consignment.

☐ Agree on the procedures with your freight forwarder or carrier for responding to requests they may receive from EU Customs authorities for further information relating to a consignment.

☐ Promptly provide necessary information to the freight forwarder, in addition to the shipment details shared through commercial documents and/or EDI (Electronic Data Interchange) messaging.

Please reach out to your freight forwarding partner in case you believe there might be some challenges with the data quality of your shipment.

The legal liability for any errors in declarations submitted by a forwarder or customs broker, acting as a direct representative, remains with the shipper.

Recommended Actions for Freight Forwarders:

For all shipments:

☐ Agree and establish reliable communication channels and clear protocols for information exchange with your customers (consignors).

☐ Agree with your customers if you will send partial notification/filing, or whether consignment details will be sent to the carrier.

☐ In case the carrier will be sending full Entry Summary Declarations (ENS) notification/filing, agree on how and when the required consignment information will be sent to them for each consignment to be carried.

☐ Establish internal procedures to ensure that the ICS2 notifications/filings are made in the frames of the specific deadlines, depending on the mode of transport (sea, rail, road) and length of journey. Specific timelines, can be verified in the ICS2 FAQs – Who must submit ENS and when?

☐ Agree with the carrier whether you will send partial ICS2 notification/filing direct or will provide this information to the carrier, who will do a full ICS2 notification/filing.
Please note that duplicate entries are not allowed and will delay the shipments.

☐ Ensure that your customers (consignors) are providing accurate and meaningful goods descriptions, including Harmonised Commodity Codes (minimum first 6 digits of the HS Code) for each article. Verify the inclusion of EORI numbers of the identity of the consignee in the EU.

☐ Staying informed about any updates or changes in the EU ICS2 requirements.

For air cargo shipments only:

☐ Establish procedures for sending Pre-Loading (PLACI) notifications, as well as full ICS2 notifications (Pre-Arrival).

☐ **In case of multiple filing**, when you intend to send partial ICS2 notification/filing, agree on the procedure with the carrier for responding to requests (Referrals) they may receive from EU Customs authorities for further information relating to a consignment.

☐ **In case of multiple filing**, establish the procedures with all the stakeholders (airport facility operators, ground handling agents) and the EU national security authorities in response to PLACI notifications, especially the "Do Not Load" notification/referral.

☐ Promote awareness among your customers about their responsibilities as consignors, to ensure the required information is provided for each consignment at the required level of detail.

☐ Incorporate the notification procedures of ICS2 into your current Customs management platform and revise your business terms and conditions to clearly allocate responsibility for providing consignment information, as needed.

In Summary

FIATA and GSF emphasise the importance of **data quality, accurate goods description, and the use of correct HS Codes** for ICS2 filing. By establishing reliable communication channels and clear protocols for information exchange between shippers and freight forwarders, we can enhance trade efficiency, build trust, promote compliance, and mitigate potential delays or disruptions during customs clearance and transportation processes. Adequate briefing and **training for personnel** may be necessary to ensure compliance with ACI requirements.

ACI regimes also provide an opportunity for supply-chain stakeholders to establish frameworks that foster trust in data sharing between various entities. To this end, FIATA and GSF have proposed a [Charter](#) for the Governance and Protection of Data in International Trade which is relevant in the current context. Supply chain stakeholders are invited to consult this document and to work on its implementation in their processes.

DISCLAIMER

This paper was compiled by the FIATA and GSF secretariats and reflects their discussions and collaborative work on this topic. This document is NOT to be construed as providing any legal advice. FIATA and GSF recommend that readers seek independent legal advice if they have any questions on dealing with their specific circumstances.
It is intended to provide a set of considerations on this subject, and FIATA and GSF accept no responsibility for the consequences of the use of the information contained in this document which may be periodically updated.

For further information, please contact the FIATA or GSF Headquarters:

FIATA: legal@fiata.org

GSF: secretariat@globalshippersforum.com

ICS2 Release 3 Timeline

Illustration: the EU Commission ICS2 website.