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Electronic Advance Data- Policy Frameworks, Regulatory and Practical Challenges & Data Quality- A perspective from An Post, Ireland

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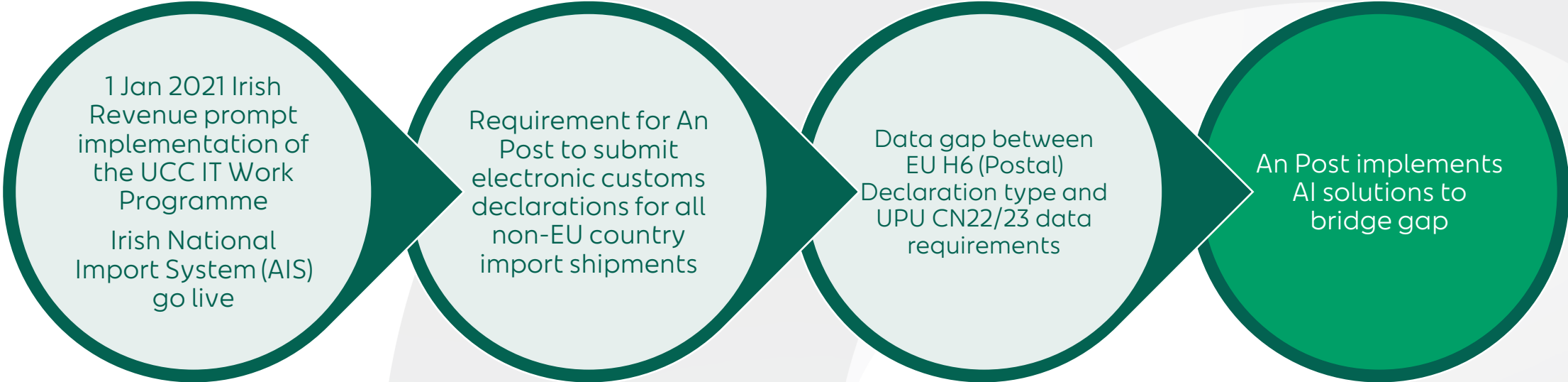
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For your world

Irish Postal Landscape 2020-2023

➢ Pre-2021: International trade not an issue for postal business as customs rules and requirements were more manageable for the destination post.

➢ 2021: Ireland and An Post in a unique position due to Brexit and disproportionate impact this has had on international trade between Ireland and the UK (now outside the EU Single Market and Customs Union for trade purposes).

➢ State-designated USP ("An Post") and the Irish Revenue have worked tirelessly over the last three years to implement EU electronic data requirements within Ireland (an EU Member State).

➢ One of the key changes introduced by the new customs regulations is the move to a paperless Customs environment i.e. all exchange of data to be made electronically.

➢ Significant increase in customs declarations required from 2021 onwards with approx. 40k declarations required daily.

Customs Declarations Post AIS

Year	Total Declarations
2019	97,422
2020	129,636
2021	11,444,719
2022	13,911,645
2023 (YTD April)	4,645,127

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Customs Data in the Postal Sector

1 Jan 2021 Irish Revenue prompt implementation of the UCC IT Work Programme

Irish National Import System (AIS) go live

Requirement for An Post to submit electronic customs declarations for all non-EU country import shipments

Data gap between EU H6 (Postal) Declaration type and UPU CN22/23 data requirements

An Post implements AI solutions to bridge gap

c.25k p/m — Return to Sender monthly average due to customs data errors

over 50% — Drop in International packet post since July 2021

200% — Customs driven increase in Customer Interactions

€150m — Customs Duty / Import VAT collected by An Post: 2021 - 2023

No electronic data = no valid customs declarations

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Specific Challenges Faced by An Post with EU Electronic Customs Rollout

- Requirement for customs data goes beyond UPU mandatory data and availability from other posts

- Uniqueness of postal sector not fully considered in EU Customs IT Work Programme

- Relationship with other postal authorities affected due to returned goods

- Negative customer experience for Irish customers and origin postal customers to this day

- Significant investment required to meet the standards of the UCC, however, progress has been made despite significant challenges

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Challenges for Postal Sector

HARMONISED GLOBAL STANDARDS

SHARED UNDERSTANDING OF THE DIFFRENTIATION NATURE OF USPs

FUTURE OF POST

Priority Actions

Harmonisation

- There must be a harmonised approach to application of EU customs rules.

- The default position must be that the most simplified data set is used for postal consignments for person to person items.

USP Differentiation

- The fundamental issue that Universal Service Provider postal trade flows are by their very nature different from eCommerce trade flows and this must be acknowledged as a matter of fact.

- We act for the common good, to provide an international network of equitable and affordable access to services for all citizens.

Need Stronger Collaboration

- WCO, UPU and EU must continue to work together to find meaningful and pragmatic solutions to ensure that globally USPs can continue to fulfil established legal mandates.

Opportunity to agree and reconfigure a global postal system that works for global customs authorities, while limiting disruption for postal users and citizens.

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THANK YOU
ご清聴ありがとうございました