ZPP 15 YEARS UNION OF ENTREPRENEURS AND EMPLOYERS

ZPP BRUSSELS

Position from the Union of Entrepreneurs and Employers (ZPP)

Feedback on COM(2025) 590 – Proposal for a Regulation establishing the Programme for the Single Market and Customs 2028–2034

1. General remarks

The Union of Entrepreneurs and Employers (ZPP) welcomes the European Commission's proposal COM(2025) 590, establishing a new Programme for the Single Market and Customs for the years 2028–2034.

This initiative aims to bring together and streamline four existing EU programmes, *Single Market*, *Customs (Customs Programme)*, *Fiscalis (Taxation Cooperation)*, and the *EU Anti-Fraud Programme*, into one integrated framework. ZPP supports the logic behind this consolidation: greater coherence, simplified management, and increased flexibility in allocating funds between interlinked policy areas.

We appreciate the recognition that a well-functioning Single Market and a modern Customs Union are vital to Europe's competitiveness and economic resilience. Both pillars underpin trade flows, innovation, and the protection of the EU's financial interests. For Poland, whose economy is deeply integrated with European supply chains and situated at the EU's external border, an efficient customs system is a direct competitiveness factor.

However, the success of this Programme will depend on its alignment with ongoing legislative processes, most notably the Union Customs Code (UCC) reform, currently under trilogue negotiations between the Council, Parliament, and the Commission. The new Programme must be designed in a way that supports rather than duplicates or complicates the upcoming UCC framework and its digital transition.

2. The Programme's relevance for business and customs reform

The consolidation of customs-related funding under one instrument creates an opportunity to accelerate the EU's customs digitalisation while ensuring consistency across Member States. The creation of the EU Customs Data Hub, as foreseen in the UCC reform, is particularly significant. The Hub will serve as the backbone of data-driven customs control, replacing fragmented national IT systems with a single digital environment.

For businesses, particularly small and medium-sized enterprises (SMEs), the success of this digital transition will depend on technical interoperability, clear guidance, and proportional requirements. The Programme should therefore:

- support the co-design of the Customs Data Hub with economic operators and logistics companies;
- fund pilot projects enabling SMEs to integrate their systems early;
- that new data-submission requirements are proportionate and risk-based, avoiding duplication with VAT or product-safety reporting.

ZPP also underlines the need to use the Programme to strengthen customs cooperation and enforcement capacity. The scope of customs responsibilities has grown significantly, encompassing product safety, sanctions, environmental compliance, and dual-use controls. Without adequate funding, Member States risk fragmentation and uneven enforcement.

3. Key business priorities and challenges

a) Digitalisation and interoperability

ZPP supports the Commission's ambition to make EU customs fully digital by 2038. Yet, integration at this scale requires close collaboration with the private sector. The Programme should establish a structured public–private task force under the future EU Customs Authority to ensure that IT developments reflect real-world logistics and trade practices. Open APIs, joint testing, and reciprocal data-sharing should be mandatory elements of the design phase.

b) Simplification and SME-friendliness

The removal of the €150 de minimis threshold and the introduction of a handling fee for low-value imports are politically understandable but risk harming small online retailers and Polish SMEs engaged in e-commerce. The Programme should allocate funds to design simplified clearance models, such as trusted e-commerce operators or simplified B2C declarations, that reduce administrative burden without compromising compliance.

c) Platform liability ("deemed importer" model)

Expanding the liability of online platforms must remain proportionate. Platforms can cooperate with customs, but cannot verify every seller's declaration or product origin. ZPP points to a co-regulation model in which platforms and customs authorities jointly develop compliance standards, share risk-screening data, and implement graduated responsibility based on control capacity.

d) Handling fee mechanism

The proposed €2 handling fee on low-value consignments must be applied uniformly across the EU to avoid competitive distortions. The Programme should support analytical work to design a harmonised, transparent methodology for fee collection and monitor its impact on cross-border trade, particularly in Central and Eastern Europe.

e) Public–private cooperation and capacity-building

ZPP recommends that the new Programme institutionalise a Permanent Business Advisory Group on Customs, including national associations, to feed into programme implementation. EU-level reforms are grounded in operational realities and lessons learned at border points, such as Poland's external frontier are directly integrated into EU policy design.

4. Implications and priorities for Poland

For Poland, as one of the largest EU economies located on the Union's external border and a key transit hub for goods entering from Eastern markets, the customs and market dimensions of the Programme have particular strategic importance.

ZPP recommends that the Polish Government, in shaping its national position, emphasise the following priorities:

- **Investment in digital infrastructure and scanning equipment:** The Programme provides that Poland's customs administration receives sufficient funding for the replacement and integration of IT systems, scanners, and risk-management tools with the EU Customs Data Hub.

- **Capacity-building and training:** The Programme should fund skills development for customs officers in new areas such as data analytics, AI-based risk profiling, and e-commerce monitoring.

- **Participation in EU governance structures:** Poland should secure a strong role for its experts in the management of the new EU Customs Authority and in the working groups defining the technical standards of the Customs Data Hub.

- **Stakeholder dialogue:** MRiT should maintain regular consultation mechanisms with business associations such as ZPP to ensure that implementation reflects the needs of Polish exporters, importers, and logistics operators.

5. Broader policy coherence

ZPP notes that the Programme also interacts with broader Single Market policies, including competition, public procurement, product conformity, and consumer protection, all of which depend on predictable and efficient enforcement. The Programme's design should therefore maintain a balance between regulatory oversight and competitiveness, avoiding administrative overlap between customs, tax, and market-surveillance frameworks.

Similarly, the Programme's statistical and data components, as outlined in the Annex, should be closely linked to the needs of economic operators. ZPP supports the development of advanced EU statistical tools but recommends that data collection minimise reporting duplication and make better use of existing private-sector data sources.

6. Conclusions and recommendations

The Union of Entrepreneurs and Employers (ZPP) supports the objectives of COM(2025) 590 and the integration of key EU programmes under a single, flexible framework. We recommend that:

1. Advocate for strong alignment with the Union Customs Code reform and ensure consistency between both frameworks.

2. Support digitalisation with business participation, guaranteeing co-design of the EU Customs Data Hub with private operators.

3. Provide proportionality and simplification for SMEs, especially concerning de minimis removal and new fee mechanisms.

4. Promote harmonised implementation across Member States to prevent market fragmentation.

5. Secure adequate funding and representation for Poland's customs administration in the Programme's governance and implementation.

6. Encourage structured stakeholder dialogue between MRiT, customs authorities, and business associations.

ZPP remains ready to provide expert input to the Ministry and contribute to further consultations on the development of the Polish Government's position regarding the Programme for the Single Market and Customs 2028–2034.

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