

Mr Maroš Šefčovič
European Commissioner for Trade and
Economic Security, Interinstitutional Relations
and Transparency



cab-sefcovic-contact@ec.europa.eu

By email

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IRU URGENTLY CALLS FOR EU-WIDE ENFORCEMENT GRACE PERIOD FOR ICS2 RELEASE 3 FOR ROAD, COMBINED AND INTERMODAL TRANSPORT

Dear Commissioner Šefčovič,

IRU, the world road transport organisation representing 3.5 million companies worldwide, including 1 million in the EU, has been very concerned about the preparations for the launch of the Import Control System 2, release 3 (ICS2 R3) for road goods transport on 1 September 2025. Since 2024, IRU has been closely cooperating with other trade organisations and the DG TAXUD ICS2 Team to raise awareness among EU and non-EU established road goods transport operators and to encourage preparedness for the 1 September 2025 deadline.

This has not happened without challenges which were reported back on a regular basis during the ICS2 Teams coordination meetings. Calls to Member State representatives for detailed information on how ICS2 for road transport would be implemented in their country have been largely left unanswered. This has made it difficult for IRU and other trade organisations to fully inform transport operators and other stakeholders in the logistics chain about how to prepare for ICS2 in different Member States.

Unfortunately, as the deployment window opened for road transport on 1 April 2025, it became clear that several Member States were encountering delays with ICS2 implementation for road transport and risked not meeting the 1 September 2025 deadline.

IRU welcomed the European Commission's initiative earlier in August to offer Member States additional time to prepare, under certain conditions. Together with other trade organisations, IRU pointed out that the request for additional implementation time would best be done in a coordinated way by all Member States.

Regretfully, this did not happen as some Member States are ready and keen to go live, while others requested more time – resulting in a fragmented situation. The patchwork that has been created will cause legal uncertainty among road transport operators and other stakeholders in the logistics chain. On 1 September 2025, filing an Entry Summary Declaration (ENS) for goods being imported into the EU by road, combined and intermodal transport will become a bureaucratic puzzle. Granting derogations is logical

if the system is not ready. But in IRU's view, this should have been done in an aligned manner for all Member States.

In the current situation, a two-speed approach will expose road transport operators to high penalties and will force difficult and expensive decisions on the routing of operations, while customs administrations may struggle with high volumes of incomplete or missing ENS declarations. This risks long queues, waiting times and severe disruptions at external borders.

IRU understands that the implementation of ICS2 is essential and will continue its efforts to encourage preparedness to use ICS2 for ENS declarations. However, without a common EU-wide approach, gridlocks may form at borders and overwhelm customs administrations. There is still time to avoid this!

Therefore, IRU calls on the European Commission to urgently grant a six-month grace period for the enforcement of ICS2 declarations for road transport and combined and intermodal transport involving road and other modes. This should allow transport operators to continue preparing while a higher level of legal certainty is established in terms of penalties due to mistakes being made. It should be noted that similar grace periods were granted for earlier release phases concerning other transport modes.

We remain at your disposal to further discuss this with you and your competent services and look forward to a positive reply to our request.

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'Raluca Marian', with a stylized flourish at the end.

Raluca Marian
Director EU Advocacy
General Delegate, IRU Permanent Delegation to the EU

Cc: Apostolos Tzitzikostas, European Commissioner for Sustainable Transport and Tourism