UFE RESOLUTION ON EU CUSTOMS REFORM

A Comprehensive Strategy for Customs and Tax Administration

in the Digital Age

Resolution Number: UFE-2025-06

Adopted: September 29, 2025, FARO, PT

DECLARATION OF URGENCY

□ CRITICAL IMPLEMENTATION DEADLINE: 36 MONTHS REMAINING □

The EU Customs Reform faces an unprecedented implementation crisis requiring immediate emergency action. With only 36 months until mandatory implementation, Europe must act decisively to prevent:

- **€50+ billion annual revenue losses to systematic platform evasion**
- **Depletion of enforcement capabilities against organized crime networks**
- **Unfair destruction of legitimate European businesses**
- **Transformation of EU markets into unregulated criminal commerce zones**

PREAMBLE

The European Union Customs Reform represents one of the most comprehensive transformations of European border management and revenue protection systems since the establishment of the Customs Union in 1968;

The exponential growth of third-country e-commerce platforms, particularly from Asia, has fundamentally disrupted traditional customs and tax collection mechanisms, with platforms generating billions in EU sales annually while systematically undermining revenue collection and fair competition;

Organized criminal networks increasingly exploit digital commerce channels for sophisticated fraud schemes, customs duty evasion, VAT carousel fraud, and money laundering operations, requiring urgent and coordinated response from customs and tax authorities;

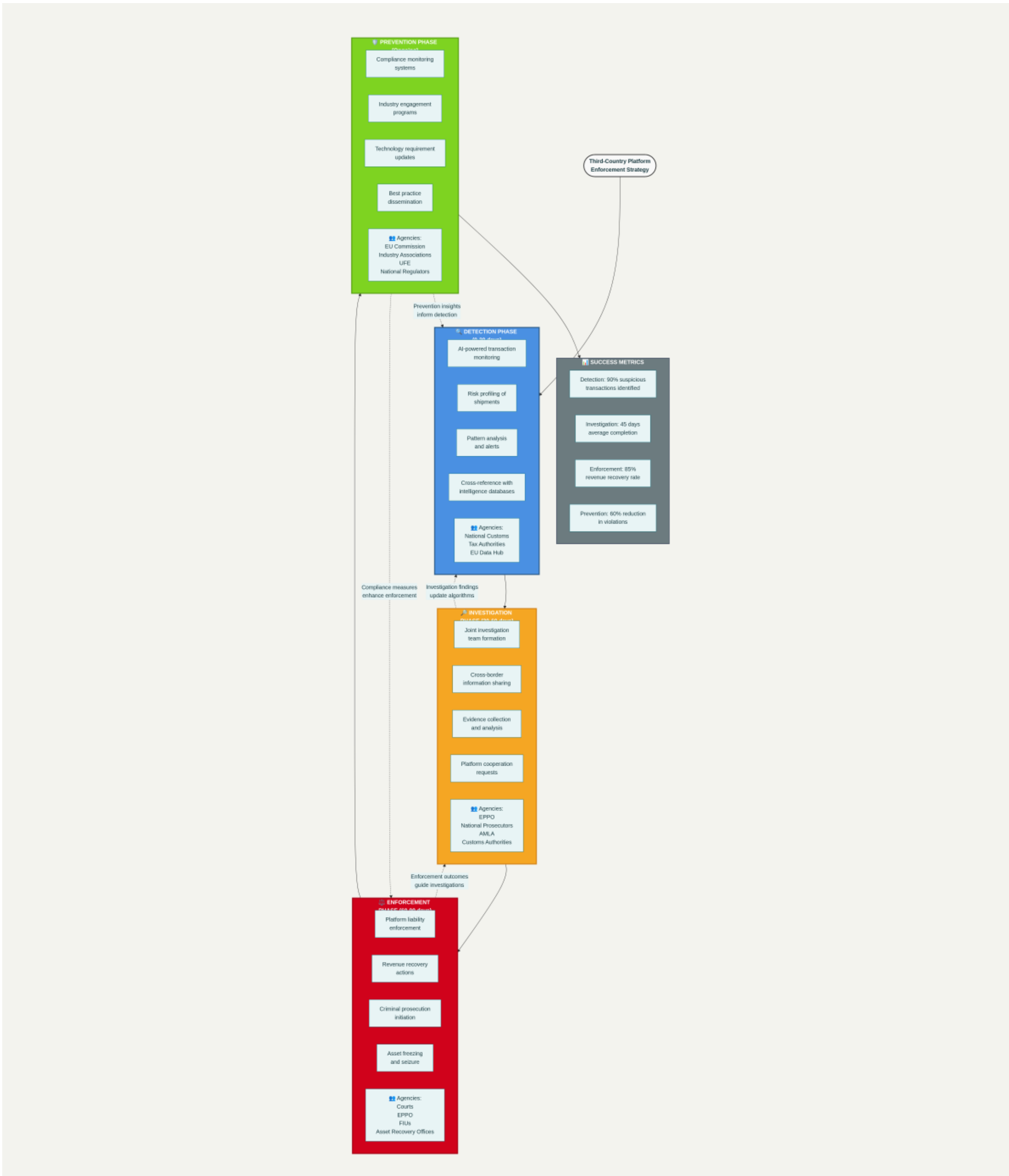
The European Commission's Action Plan on E-commerce VAT and the Platform Economy demands immediate and comprehensive implementation to address the massive annual revenue gap caused by platform-enabled tax avoidance;

The Cooperation of the Anti-Money Laundering Authority (AMLA), European Public Prosecutor's Office (EPPO), and national customs and tax administrations represents an unprecedented opportunity for holistic enforcement coordination;

The 2028 implementation deadline for the EU Customs Reform creates an urgency that demands immediate action, accelerated resource allocation, and streamlined decision-making processes;

The UFE Presidium hereby adopts this Resolution and urgently demands that the EU Commission introduces comprehensive strategies and a mandatory implementation framework for EU Customs Reform and integrated enforcement coordination.

• Chart 1: Third-Country Platform Enforcement Action Plan



II. UFE Proposal to the EU Commission of a SEVEN-POINT ACTION PLAN FOR PLATFORM ECONOMY ENFORCEMENT

POINT 1: IMMEDIATE LIABILITY ENFORCEMENT

• Deemed Importer Responsibility: Platforms become legally liable for all customs duties and VAT
• Real-time Compliance Verification: Mandatory pre-transaction tax and duty calculation
• Automatic Revenue Collection: Platform-integrated collection with daily remittance
• Non-compliance Penalties: Progressive sanctions up to complete EU market exclusion

POINT 2: ADVANCED TECHNOLOGY DEPLOYMENT

• AI-Powered Risk Assessment: Machine learning identifying high-risk transactions in real-time
• Blockchain Supply Chain Tracking: Immutable records from manufacturer to consumer
• Automated Fraud Detection: Pattern recognition for systematic evasion identification
• Digital Forensics Capability: Specialized units for complex platform investigations

POINT 3: CROSS-BORDER COORDINATION

• Joint Investigation Teams: Permanent multi-national units focused on platform compliance
• Real-time Information Sharing: Instantaneous data exchange between all EU agencies
• Coordinated Enforcement Actions: Simultaneous operations across multiple jurisdictions
• Introduce international mobility: Establish exchange programs and temporary assignments to build cross-border expertise and cooperation networks
• International Cooperation Protocols: Enhanced partnerships with origin countries

POINT 4: RAPID RESPONSE ENFORCEMENT

• 90-Day Maximum Response Cycle: From detection to enforcement completion
• Emergency Injunction Procedures: Immediate platform operation suspension capability
• Asset Freezing Mechanisms: Cross-border seizure of platform revenues and assets
• Criminal Prosecution Coordination: Streamlined referral to EPPO for serious violations

POINT 5: INDUSTRY ENGAGEMENT

• Mandatory Compliance Certification: Annual platform auditing and certification
• Industry Best Practice Programs: Collaborative compliance standards development
• “Whistleblower” Protection: Secure and confidential reporting mechanisms
• Legitimate Business Support: Streamlined procedures for compliant platforms

POINT 6: CONTINUOUS ADAPTATION

• Quarterly Strategy Reviews: Regular adaptation to evolving avoidance tactics
• International Best Practice Integration: Collaboration with the World Customs Organisation (WCO) on learning from global enforcement successes
• Technology Innovation Partnerships: Collaboration with fintech and regtech providers
• Performance Metrics and KPIs: Introduce comprehensive enforcement effectiveness measurement

POINT 7: NEED FOR PROPER FUNDING

If the EU Commission and Member States are serious about proper customs controls, border management and protection of legitimate businesses adequate funding will be needed to support these aims.

In particular, the following need serious financing:

PERSONNEL AND TRAINING
• Specialized recruitment programs
• Comprehensive training initiatives
• Personnel exchange and coordination
• Retention and motivation programs

TECHNOLOGY INFRASTRUCTURE:
• EU Customs Data Hub enhancement
• National system integration
• AI and analytics platform development

OPERATIONAL COORDINATION
• Inter-agency integration systems
• Joint investigation team funding
• International cooperation programs
• Emergency response capabilities

III. INTEGRATED MULTI-AGENCY ENFORCEMENT FRAMEWORK

Holistic Approach to Financial Crime Prevention

UFE promotes the creation of an Integrated European Enforcement Ecosystem and calls the EU Commission to examine this integrated approach under the following headings:

A. ANTI-MONEY LAUNDERING AUTHORITY (AMLA)

• Direct Customs-AMLA Data Sharing: Real-time transaction monitoring and suspicious activity reporting
• Joint Training Programs: Cross-agency competency development for customs and AML personnel
• Coordinated Investigation Protocols: Unified approach to complex financial crime cases
• Shared Intelligence Systems: Common databases for risk assessment and case management

B. EUROPEAN PUBLIC PROSECUTOR'S OFFICE (EPPO)

• Permanent EPPO Liaison Units: Dedicated prosecutors within major customs administrations
• Expedited Referral Procedures: Streamlined pathways for serious customs fraud cases
• Joint Investigation Teams: EPPO-led multi-jurisdictional enforcement operations
• Asset Recovery Coordination: Unified approach to cross-border asset seizure

C. FINANCIAL INTELLIGENCE UNIT (FIU)

• Customs-FIU Information Sharing: Automatic reporting of trade-based money laundering
• Enhanced Due Diligence: Strengthened verification for high-risk transactions
• Beneficial Ownership Transparency: Real-time access to ultimate beneficial owner information
• Sanctions Compliance Coordination: Integrated approach to trade-based sanctions evasio

IV. KPI's

To monitor the SEVEN-POINT ACTION PLAN the following KPI's need to be introduced:

REVENUE PROTECTION TARGETS:

- Additional Revenue Collection: €15 billion annually by 2030
- Platform Compliance Rate: 85% effective compliance
- Revenue Recovery Efficiency: 80% successful collection
- Audit: 100% of discovered fraud cases

OPERATIONAL EFFICIENCY TARGETS:

- Audit Completion: Average 45 days from examination to decision
- Cross-Border Coordination: Maximum 72 hours for urgent information sharing
- System Performance: 99.9% uptime for critical declaration and enforcement systems
- Personnel Productivity: annual monitoring of cases resolved per officer

ENFORCEMENT EFFECTIVENESS TARGETS:

- Platform Compliance Improvement: 60% reduction in systematic violations
- Criminal Prosecution Rate: 90% of cases referred to EPPO for prosecution
- Asset Recovery Success: 70% successful recovery of criminal proceeds
- Deterrent Effect: 50% reduction in attempted new fraud schemes

V. URGENT CALL TO ACTION

The European Union faces an unprecedented challenge that will define the future of fair taxation, legitimate commerce, and public revenue protection for generations to come.

THE STAKES COULD NOT BE HIGHER:

ECONOMIC IMPERATIVE:
• Billions of Euro annual revenue loss to platform-enabled evasion and fraud
• Unfair competition destroying legitimate European businesses
• Consumer protection compromised by counterfeit and dangerous goods
• Tax system integrity undermined by systematic non-compliance

SECURITY IMPERATIVE:
• Organized crime networks exploiting enforcement gaps
• National security threats from uncontrolled importation
• Money laundering and terrorist financing facilitation
• Supply chain vulnerabilities creating systemic risks

DEMOCRATIC IMPERATIVE:
• Rule of law requiring equal application to all market participants
• European integration demanding effective common enforcement
• Public trust depending on visible protection of citizen interests
• Global leadership in digital commerce governance standards

UFE'S HISTORIC COMMITMENT:

As the collective voice of over 400,000 European customs and tax professionals, UFE makes this solemn commitment:

WE DO NOT ACCEPT the continued systematic exploitation of European consumers and businesses.

WE DO NOT TOLERATE the undermining of European tax systems funding essential public services.

WE SHOULD NOT PERMIT the transformation of digital commerce into criminal enterprise.

WE DEMAND the resources, authority, and support necessary to protect European interests.

Europe faces a fundamental choice determining the future of its economic sovereignty:

OPTION 1: DECISIVE ACTION leading to effective revenue protection, global leadership, and strengthened institutions.

OPTION 2: CONTINUED DRIFT resulting in revenue erosion, criminal network strengthening, and institutional weakening.

UFE CHOOSES DECISIVE ACTION.

We commit our expertise and determination to successful transformation. But we demand the resources and support necessary to succeed.

The time for half-measures has ended.
The time for comprehensive action has begun.

Together, we MUST build the enforcement capabilities Europe needs.
Together, we MUST protect European interests and democratic governance.
Together, we MUST establish Europe as the global leader in fair digital commerce enforcement.

THE FUTURE OF EUROPEAN SOVEREIGNTY DEPENDS ON DECISIONS MADE IN THE COMING MONTHS.

UFE STANDS READY. THE QUESTION IS: DOES EUROPE?