

## UPDATE - IMPORT CONTROL SYSTEM 2 FOR TRANSPORT (ICS2) – VERSION 3.0

*With additional general and country implementation (FR and PL) information*

### Version 3.0 - updated information for the implementation of ICS2 for road transport.

#### I. BACKGROUND

The European Union (EU) has introduced the [Import Control System 2 \(ICS2\)](#), a new set of safety and security requirements that add complexity to the work of supply chains. These changes will particularly impact the road goods transport and logistics industry. Under ICS2, transport operators must obtain and submit more detailed information from their partners to customs authorities, information that was not previously required or typically shared regularly. This data must be submitted in the form of an Entry Summary Declaration (ENS) before goods arrive in the EU. Transport operators will be held liable for any incomplete or incorrect submissions and potentially face penalties.

The implementation of ICS2 aims to enhance pre-arrival security and safety measures for all goods transported into or through the EU, Northern Ireland, Norway and Switzerland. However, it also introduces new challenges and responsibilities for transport operators. The implementation of ICS2 will take place in several phases. It started in March 2021 with airlines and postal services by air. For maritime carriage, Release 3 went live on 3 June 2024.

Implementation in road and rail transport is part of Release 3. For road transport, the third release of ICS2 will go live on 1 April 2025, with a transition period lasting until 1 September 2025, when it will become mandatory. During this time, it is crucial for all supply chain actors to be informed and prepared to ensure the continuous movement of goods and avoid blockages at borders. Important points to consider include:

- Road goods transport operators will have the possibility to **outsource ICS2 declarations** to a third party. It will be important to make agreements about this well in advance and ensure that the correct information is exchanged for the declaration. Even if the declaration is done by a third party, the road goods transport operator remains liable for the quality of the declaration.
- Declarations can be done up to **one hour prior to arrival** at a border. Issues with the declaration can lead to the vehicle being blocked at a border. It is recommended to check declarations before the start of carriage and delay the carriage if any information is missing from the declarations. It is possible that changes occur after the declaration is filed, such as a last-minute change to the entry point into the EU. If it is no longer possible to file a new declaration, it should be sufficient to present the goods at the new entry point.
- Declarations will be **necessary for import and for transit through the territory of the EU**. According to the European Commission, temporary entry will not require ICS2 declarations when done under an ATA Carnet.
- A **separate declaration will be required for every single consignment** on the vehicle. It will not be possible to declare all consignments on the vehicle, such as e-commerce, in one single declaration. It will also be necessary to have a “master consignment note” available covering all consignments carried on the vehicle during a journey.
- **Unimodal road transport** declarations will have to be made through **single filing**, meaning that one party will have to do the complete declaration. The European Commission is developing the possibility

to do multiple filings following an IRU request, but this will only become available in the course of 2026. It should also be noted that multiple filings will only remain possible in NCTS5. In NCTS6, only single filings will be possible.

- **Postal carriage** by unimodal road transport can use multiple filings for the declarations.
- Declarants, whether established in the EU or in a third country, will need an **EU EORI number**. Those who do not yet have an EORI number should request one from the relevant national authorities well in advance, as obtaining the number can take some time.
- **Not all the information required for the declarations is readily accessible to road goods transport operators**. It will be important to make the necessary agreements for information exchange with the relevant parties in due time.
- Declarations for **combined or intermodal transport** will depend on whether the transport is accompanied or unaccompanied. According to the rules, the propulsion determines who is responsible for completing the declaration. In the case of accompanied transport, the road transport operator is responsible for the declaration. The road goods transport operator will also have to provide information about the mode which is carrying the vehicle combination (train or ferry). For unaccompanied transport, the other mode will have to make the declaration; but the road goods transport operator will have to share the information with the other carrier. It is important to note that it is up to each Member State to individually decide which system will be used to make the declarations. It will be critical to always check what applies. Some examples:
  - **Ireland** will establish one single system through which declarations for combined and multimodal transports can be done, no matter the type of transport.
  - **Netherlands** will establish two different systems: one for accompanied transport and one for unaccompanied transport.

Members are advised to check with their competent authorities to determine how this will be done and to communicate the information to the IRU Secretariat, so a list can be compiled and shared with all members.

- Under NCTS 5, a separate ENS declaration will have to be filed, so **double filing** is required. NCTS 6 will no longer require such double filing. It should be noted that Member States will not be obliged to implement NCTS 6 and that NCTS 6 will no longer support multiple filing.
- The inclusion of road in ICS2 is expected to exponentially **increase the number of declarations**. The European Commission is convinced that the IT systems will be able to manage this increase.
- Until now, ICS2 has been primarily a matter for postal, air and maritime carriage. Customs departments handling road transport may not yet be fully aware of the upcoming changes and may not have anticipated the **necessary human resources** to deal with ICS2 for road transport. Members are advised to raise this with their customs authorities to ensure that everything possible is done to minimise bottlenecks at borders.
- **Economic operators not ready for ICS2** by 1 April 2025 should apply for a deployment window in the Member State where they have the EORI number. Such a deployment exempts the economic operator from using ICS2 until end of August 2025; it does not exempt the economic operator from doing an Entry Summary Declaration (ENS). Normally, applications should be done 1 month in advance, but there are different approaches in Member States. Any granted deployment window applies to all Member States. It should be noted that given the very large numbers of applications, it can take long before the granting of a deployment window is confirmed by a Member State. IRU prepared a [template letter](#) to apply for a deployment window.

## II. IMPORTANT EUROPEAN COMMISSION INFORMATION SOURCES

The European Commission has made all the relevant information publicly available to allow economic operators to prepare for the implementation of ICS2 in the best possible way. The DG TAXUD ICS2 team recommends consulting the following sources.

### 1. ICS2 website

Link: [ICS2 - European Commission](#)

The ICS2 website contains all the necessary information for all modes of transport. In addition, direct links can be found to navigate– among others – the ICS2 Operational Guidance, functional and technical specifications, factsheets, eLearning materials and all documents that are inevitable for the convenient business and technical preparation for the ICS2 implementation. They advise reading the '[How to prepare](#)' part of the website carefully to be able to do the necessary steps in time.

- a) **ICS2 FAQ.** IRU advises members to consult the [Frequently Asked Questions \(FAQ\)](#) page of the ICS2 website. It provides a first level introduction into ICS2 and its requirements, with responses to a variety of ICS2 business and technical questions.
- b) **Resources.** The '[Resources](#)' tab of the ICS2 website contains a significant number of ready-to-use materials, which can help Economic Operators to familiarise themselves with industry-specific requirements as well as generic ICS2 information.
  - ICS2 Factsheets: The European Commission has six factsheets that provide entry-level information on the following topics:
    - ICS2 factsheet
    - Maritime, rail and road factsheets
    - Technical factsheet
    - Multiple filing factsheet

The factsheets are available in several languages (including German, Spanish, French, Portuguese, Russian, Arabic). By clicking on the picture of a factsheet, you will be directed to the publication site, where you can select the language of the publication.

- eLearning: The EC has developed and made available seven eLearning courses. Six of them explain ICS2 processes and data requirements for the following modes of the transport: Air Cargo general, express, postal, maritime and inland waterways, rail and road. The seventh eLearning Module focuses on the ICS2 End-to-End Testing. The eLearning modules are in English and provide an opportunity to follow step-by-step introduction on the sector-specific ICS2 processes and information requirements.

**IMPORTANT:** For those who have not started the ICS2 preparation yet, please keep in mind that issuing an EORI number, registering in UUM&DS, and gaining access to the ICS2 Shared Trader Portal (STP) **may take time (up to several weeks)**. Please start the preparation well in advance to be ready on time!

## **2. CIRCABC – EU Advance Cargo Information System (ICS2) group (publicly available and downloadable information)**

Link: [EU Advance Cargo Information System \(ICS2\)](#)

The CIRCABC website is a collaborative European Commission workspace where different groups are created for different projects. The library of the ICS2 CIRCABC group (tab '[Library](#)') contains the most up-to-date information and documents on ICS2 that are relevant for economic operators. It is publicly available for anyone (customs administrations and economic operators), no need to request user access to join this group. The ICS2 TAXUD team continuously maintains the folders and publishes the latest versions of the ICS2 documents and certificates that are necessary to be compliant with ICS2 requirements.

On the ICS2 website (under '[Resources](#)'), there are also recommendations on the sequence in which the documents published in CIRCABC should be read.

## **3. Contact ICS2 National Service Desk of EU Member States**

If you have any questions after consulting the ICS2 material and documents, we advise you to contact the ICS2 National Service Desk of the given EU Member State where your EORI number was issued or where your business is taking place. The contact details of the ICS2 National Service Desks of EU Member States are available in the above-mentioned CIRCABC group (filename: Contact details of ICS2 NSD).

## **4. ICS2 Monthly technical operational call**

The ICS2 team holds ICS2 technical operational calls on a monthly basis (usually on the Wednesday of the first week of the month) for economic operators and Member States to pose technical and operational ICS2 questions. When possible, the IRU Secretariat participates in these meetings. DG TAXUD does not send

invitations via e-mail. The planned date and time, in addition to the Webex link to connect to the call are always published under the tab '[Agenda](#)' in the CIRCABC group [EU Advance Cargo Information System \(ICS2\)](#). Please note that the 'Agenda' link navigates you to the current month of the year, but you have the option on the left-hand side (left-right arrows) to find the relevant month you are looking for.

In addition, the baseline for the monthly ICS2 technical operational calls is the set of questions that the ICS2 team receives from economic operators and customs administrations. We kindly encourage you to send your questions to the ICS2 Functional mailbox [TAXUD-ICS2-PROJECT-CM@ec.europa.eu](mailto:TAXUD-ICS2-PROJECT-CM@ec.europa.eu) with the following email subject '*Questions to the ICS2 technical-operational calls*', at the latest three days before the next meeting.

## 5. Communication channels and social media

DG TAXUD has a dedicated communication workstream to share information on ICS2 requirements and disseminate information to economic operators in different transport and logistics supply chain sectors: air, maritime, rail and road. For this, they use different means of communication, including website updates, publication of factsheets, videos, press releases, and social media posts (LinkedIn, X).

On a monthly basis, they publish ICS2 posts on the LinkedIn page of DG Trade. The following two posts were published in January:

- [https://www.linkedin.com/posts/trade-eu\\_ics2-activity-7281942850810892288-0116/?utm\\_source=share&utm\\_medium=member\\_desktop](https://www.linkedin.com/posts/trade-eu_ics2-activity-7281942850810892288-0116/?utm_source=share&utm_medium=member_desktop)
- [https://www.linkedin.com/posts/trade-eu\\_ics2-activity-7280474146180845568-1868/?utm\\_source=share&utm\\_medium=member\\_desktop](https://www.linkedin.com/posts/trade-eu_ics2-activity-7280474146180845568-1868/?utm_source=share&utm_medium=member_desktop)

Please regularly check European Commission social media account. They would appreciate if you could re-publish the links on your LinkedIn page and/or share on your website the links to these posts. In this way, ICS2 information could reach a wider range of representatives from various business sectors.

## III. COUNTRY INFORMATION

### 1. Bulgaria (source Bulgarian Customs and AEBTRI)

- From 1 April 2025, road and rail carriers must submit data for Entry Summary Declarations (ESDs) to ICS2. Those carriers who are not ready to submit data and have received an EORI number in Bulgaria can request a deployment window with a free text application sent to [servicedesk@customs.bg](mailto:servicedesk@customs.bg).
- The application must necessarily contain the EORI number of the economic operator. Upon receipt of the application registration number, the transition period for the specific carrier is considered to be granted. A single application can only request a deployment window for one company. Deployment windows have fixed deadline of 1 September 2025 and after this date all road and rail carriers should comply with the requirements of ICS2.
- Economic operators having requested a deployment window will have to continue to submit security and safety data via the transit declaration, if it contains such, or via the Open Document Format (ODF) in ICS1.
- Carriers who have not made themselves available under ICS2 or have not requested a deployment window will not be able to introduce goods into the EU via Bulgaria.
- Information, documentation and instructions regarding ICS2 are published on the [E-Portal of the Customs Agency](#) in the menu "Documents"/ "Current documents" in the section "Import Control System 2 (ICS2)".

### 2. France (source: French Customs, HMRC and AFTRI) (update)

For France, the ANTES system has to be used for the ENS declarations. Goods shipped between the UK and France will have to use the Obligatory Logistics Envelope (ELO) at the smart border between France and the UK.

#### a) ANTES

- ANTES is the French national system implementing ICS2 which is linked with the EU ICS2 system (the Common Repository) and will have to be used by those making ENS declarations for the goods entering the EU Customs Territory via France.

- The transport operator, a service provider of choice or anyone taking charge of the goods can make ENS declarations via ICS2 but the carrier remains responsible. For declarations to be done via ANTES, a French EORI number is required.
  - In case of combined or intermodal transport, responsibility for the declaration depends on the type of carriage. In case of accompanied operations, the road carrier is liable for the declaration, in case of unaccompanied operations, the non-road mode is responsible.
  - It should be noted that French Customs has prolonged the use of ICS1 for maritime ENS declarations until 1 August 2025.
  - More information can be found in a [dedicated document prepared by French Customs](#) (only available in French). For those who are not yet ready to use ICS2, a deployment window can be applied for with French Customs by completing Annex 4 of the mentioned document and sending it back without delay to: [fr-ics2@douane.finances.gouv.fr](mailto:fr-ics2@douane.finances.gouv.fr).
- b) Obligatory Logistics Envelope (ELO) at the smart border between France and the UK:
- ELO is a new smart border system for RORO and unaccompanied transport was supposed to become mandatory from 1 April 2025 but has been postponed several weeks. No new date is known yet.
  - It is used to pair all information that was previously made available to customs officers at the crossing (declarations, phytosanitary info and ENS data, TIR/ATA carnet number, etc); it is an extra step for the industry.
  - Customs formalities to be submitted in the same way as today (ENS to ICS1 and ICS2 from 1 April 2025, Advance cargo information to NCTS...). References to be sent to ELO for grouping together, before crossing the Brexit border.
  - One person from the supply chain will need to log in to the ELO website ([douane.gouv.fr/ELO](http://douane.gouv.fr/ELO) website coming soon) and complete the required information. This will require changes to the operational procedures between the supply chain parties to obtain all the information and appoint a person responsible for submitting to ELO.
  - Once all the information has been submitted, it will generate an **ELO pdf document with a barcode** that will need to be presented to each customs office of exit and entry on both sides of the French and UK border.
  - Their timeline is aligned with ICS2 deployment, meaning that **ELO becomes mandatory from 1 April 2025**. However, it may exclude ENS data until 1 September 2025 if economic operators have requested and been granted an extension to submit ENS data to ICS2.
  - One ELO will be required per truck combination. Empty trucks must also present an ELO but will be allowed to enter less data (without GRN, ENS, etc)
  - Upon presentation of a transport at borders, TIR/ATA carnet users will be directed to orange lanes to complete customs formalities.
  - There is no minimum advance time required for submitting ELO before arrival at customs. Other time limits still apply, at least one hour in advance for ENS and one hour for transit/import/export data.
  - You may view the [ELO webinar recording](#) for more information.
3. **Greece (source Greek Customs and OFAE)**
- From 1 April 2025, road goods transport operators will have to submit a separate safety and security declaration (ENS) through ICS2.
  - Road goods transport operators or their service providers who are not yet ready to use ICS2 can apply for a deployment window with Greek Customs providing they have a Greek EORI number. Any request for a deployment window should already include a plan on how they intend to implement ICS2.
  - More detailed information can be found [here](#).
4. **Hungary (source Hungarian Customs and MKFE)**
- From 1 April 2025, road goods transport operators will have to submit a separate safety and security declaration (ENS) through ICS2.

- Hungary has chosen for the opt-out of NCTS6; therefore two declarations will remain necessary in Hungary in the medium and long run.
- For those not ready, a deployment window can be requested in the Member State where they have an EORI number. Those not established in an EU Member State can also request an EORI number in Hungary.
- It is commended to use one of the following application forms: [deployment window ICS2, release 3 and EORI number for non-EU established operators](#); [request for a deployment window for non-EU established operators, release 3](#); [request for an EORI number for non-EU established operators](#).

#### **5. Poland (source Polish Customs and ZMPD) (update)**

- Normally, from 1 April 2025, road goods transport operators have to submit a separate safety and security declaration (ENS) through ICS2.
- Poland is granting a general and implicit consent to all road and rail economic operators to not use ICS2 until 1 September 2025 for goods entering the EU via Poland. Those who are ready to use ICS2 can submit ENS declarations to the new AIS/ICS2 system. Those not ready should declare via the existing AIS/ICS system. For goods in transit through Poland, the ENS can be declared via NCTS2 plus.
- It should be noted that everyone bringing goods into the EU via Poland should be fully ready to use ICS2 by 1 September 2025.
- Once Poland is ready with the implementation of NCTS, phase 6, the ENS declarations will be possible through the same system as the customs declaration. Separate declarations will no longer be required.

#### **6. United Kingdom (Northern Ireland only) (source HMRC)**

- The UK will operate a deployment period for ICS2 (Northern Ireland only) from 1 April – 1 September 2025. Economic operators not ready to use ICS2 by the start of the deployment period can request for a deployment window in the Member State where they have an EORI number.
- EORI numbers starting with XI (economic operators established in Wales, England, Scotland) moving goods into Northern Ireland from Great-Britain or a non-EU third country must be requested from HMRC.
- A deployment window will not apply to Northern Ireland parcel movements due to the Windsor Framework requirement. From 1 May 2025, all transport modes must do an ICS2 declaration for Northern Ireland parcel movements.
- More detailed information can be found [here](#).

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