Blue Belt Pilot Project

Evaluation report
Lisbon, 4th May 2012
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Executive Summary

The Blue Belt pilot project, set up to see if providing ship information could simplify customs formalities for ships trading within the EU, was evaluated from a technical, operational and legal point of view to assess how the service was being used by the customs authorities.

The feedback provided by the Member States’ customs authorities and the shipping industry\(^1\) is the basis for determining how the information contained in the Blue Belt notification reports was used by the customs authorities.

The project monitoring data, which was received from the Member States and the shipping industry, provides information about the quality of the Blue Belt service, and invites the stakeholders to provide suggestions how it could be further improved. These results are presented in the first section and can be summarised as follows:

- The Blue Belt service had successfully delivered information about the participating vessels and their voyage to the custom authorities with very few technical problems;
- The information contained in the Blue Belt reports was useful to custom authorities.

An analysis of these results, taking into account the project aims as defined in the project implementation plan is presented in the second section of the evaluation report.

The findings of the evaluation conclude that the pilot project has successfully demonstrated that the information delivered through the Blue Belt service to the customs authorities can provide them with useful information about the ship’s voyage and can help create reassurances that goods remain under constant customs supervision.

The customs authorities also made additional suggestions to further improve the service which are outlined in annexe 1.

\(^1\) The pilot project was subject to continuous monitoring. For the purpose of the evaluation, data was collected via questionnaires sent to the Member States and industry. Further comments that contributed to the evaluation were also received from all stakeholders during the meetings of the Electronic Customs Group and during the meetings of the Member States Correspondence Group (CG) and industry Advisory Group (AG).
Introduction

On 15-16 September 2010, the informal meeting of EU transport ministers dedicated to inland and maritime transport\(^2\) embraced the "Blue Belt" concept, an initiative of the Belgian EU Presidency. The long term objective of the "Blue Belt" concept is to create a European maritime transport space without barriers, where ships are able to operate freely with a minimum of administrative formalities, irrespective of their flag.

The "Blue Belt" will be complemented by "Blue Lanes". Blue Lanes refer to administrative, technological or physical facilitations granted by ports and customs authorities to ensure swift processing of goods in free circulation in the EU.

The EU Council supported the Commission's plan to launch a pilot project, in cooperation with the Member States' authorities and the European Maritime Safety Agency (EMSA), to implement the "Blue Belt" concept. The Blue Belt pilot project was formalised in the Council conclusions adopted by the Transport Council of December 2, 2010. The Blue Belt Pilot Project provides ship notification reports to customs authorities of all EU Member States, with the aim of supporting customs by providing verified information about the voyages of vessels engaged in intra-EU trade. The notification reports are generated automatically by a specific module of the Community vessel monitoring system, SafeSeaNet (SSN)\(^3\), and delivered to the relevant customs authority two hours before a ships estimated arrival.

The pilot project was rolled-out in different phases. Initially, a planning and preparatory phase took place during which the requirements from EU customs authorities and the shipping industry were collected and integrated into a project implementation plan. Once approved, technical adjustments to SSN functionalities were made, followed by the appropriate validation tests. At the same time, a Correspondence Group (CG) with the participation of the related Commission services, EMSA and volunteering Member States as well as an Advisory Group (AG) comprising ship owners were established with the aim of assisting in the implementation and monitoring of the project.

The pilot project monitored 253 vessels (the "Blue Ships"), identified by the European Community Shipowners Association (ECSA) and the World Shipping Council (WSC), which participated in the pilot project on a voluntary basis. A cross-section of vessels was chosen to be representative of the different trades most frequently seen in the European Union, such as pure intra-EU movements (under the authorized regular shipping service regime (RSS) or not), feeder or main haul liner shipping vessels and bulk carriers.

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\(^2\) Informal meeting of the Transport Ministers, 15 and 16 September 2010, "Towards full integration of waterborne transport into the EU transport and logistics chains".

\(^3\) As defined in article 3(4) of Directive 2002/59/EC of 27 June 2002, establishing a Community vessel traffic monitoring and information system and repealing Council Directive 93/75/EEC, ‘SafeSeaNet’ means the Community maritime information exchange system developed by the Commission in cooperation with the Member States to ensure the implementation of Community legislation;
During the operational phase ship notification reports were delivered to the customs authorities. These reports are composed of two attachments:

1) the voyage report containing information about the vessel, its recent ports of call and the last voyage details; and

2) and a screen shot indicating the Blue Belt ship track toward the destination port, plotted on a nautical chart.

Additional features were introduced later in the project, such as the integration of Satellite AIS (Automatic Identification System) position data, to track the Blue Ships beyond limits of coastal coverage of AIS shore stations, and information on vessel behaviour (e.g. encounter at sea, not reporting, etc.) was agreed to and put into test.

The outcome of the evaluation of the Blue Belt pilot project will determine whether existing customs procedures can be adapted, using reliable ship notification reports as a support instrument, to promote and simplify intra-EU trade. It was agreed that the pilot project would be evaluated at the end of 2011, in order to assess how the Blue Belt service contributed to fulfilling the objectives of the Blue Belt concept.
1 Project monitoring results

1.1. Monitoring methodology

The Blue belt project was launched in May 2011. In order to effectively evaluate the project, it was agreed that the concerned Member States and industry would provide feedback to the European Commission and EMSA on the technical and operational aspects of the project. This process is described in the "The Blue Belt pilot project monitoring and evaluation methodology" that was approved by the Electronic Customs Group (ECG) in July 2011.

The Blue Belt pilot project has been evaluated on the basis of the first six months of operations, in accordance with the timetable agreed in the "Project Monitoring and Evaluation methodology" (Annex 1).

The evaluation of the pilot project uses technical and operational indicators to:

- assess to which extent the information provided about vessels and their voyages by the Blue Belt service has been useful, timely and relevant to the customs authorities, and to what extent it has helped them to improve operational efficiency and given reassurances about a ship's voyage;

- explore whether additional technical functionalities or parameters would be needed by the customs authorities and if the service should be extended to all vessels trading in EU waters;

- be used as a basis by the related Commission services to explore the possibilities of extending Customs facilitations to all ships that sail between EU ports, granted that they can effectively be tracked using technical tools.

The indicators can be split into two broad categories: technical indicators and operational indicators. The technical indicators relate to how the notification reports are delivered and assess the accuracy and relevance of the information contained in the reports. The operational indicators relate to how the customs authorities used the notification reports and their subsequent approach to handling Blue Ships. These indicators measure the realisation of the project aims taking into account the different roles and perspectives of the main stakeholders (the EU Member States customs authorities; the European Commission; the shipping industry and some EU ports selected by ESPO).

Data was collected via questionnaire from the EU Member States and also from the industry participants. The data will allow an assessment of the practical impacts of the Blue Belt pilot project both from the customs and industry perspective.

Concerning the technical aspects of the project, information was collected twice from the Member States’ customs authorities via a questionnaire covering the periods May-July and August-October 2011. For the operational aspects of the project a questionnaire was sent to the Member States covering the period May-November 2011. This information provided feedback about the service delivery of the pilot project.

The purpose of collecting data relating to the operational aspects of the project was to assess whether the information contained in the reports had been useful to customs authorities when carrying out customs procedures, if the information contained in the reports had been accurate and, whether
providing reliable information related to ships voyages to the customs authorities could in the future lead to facilitations for vessels trading in EU waters.

The feedback and comments provided during the Electronic Customs Group meetings, chaired by DG TAXUD, the meetings of the Member States correspondence group (CG) and the shipowners Advisory Group (AG) has been used for the evaluation.

The shipping industry also sent out questionnaires to the participating companies and ships in order to get accurate information about the impact of the pilot project on customs procedures for the participating vessels.

### 1.2. Monitoring results from the customs authorities

#### 1.2.1. Response rate

Of the 22 Coastal EU Member States invited to provide feedback on the project via the questionnaires, 21 responses were submitted.

- One Member State was not visited by any of the Blue Ships;
- One Member State did not respond to the technical questionnaire;
- Two Member States did not respond to the operational questionnaire;
- One Member State submitted a response but is not included in the results as it was stated that the Blue Belt Reports were received, but for internal reasons, they were not used.

Thus, the responses to the questionnaires (technical and operational rounds) are:

- 19 Member States for the technical indicators;
- 18 Member States for the operational indicators.

Some of the questions required responses that were open-ended, and the Member States were invited to comment accordingly.

#### 1.2.2. Technical questionnaire responses (combined results from the two technical questionnaires)

The following section presents the responses to the technical questions (a-h). The technical questionnaire focussed on the timeliness of the report delivery, the completeness and accuracy of the information contained in the notification reports, and the transmission mechanism of the report.
**a - Have you been regularly receiving Blue Belt reports for your port?**

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18 responded that the Blue Belt reports were received on a regular basis, while one Member State stated that no report was received since no Blue Ships had called at its ports.

**b - Has your port been called regularly by “Blue Ship” vessels? If yes, how many of these vessels arrived at your port?**

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Of the 19 respondents, 18 Member States had been regularly visited by Blue Ships. One Member State had not received any visits from a Blue Ship. There were around 26,000 ship calls made by Blue Ships in EU ports. Given that more than 45,700 blue belt reports were sent during the operational phase (5 May - 2 Nov 2011), this results in an average of two notification reports sent to the relevant customs authorities for each voyage undertaken by a Blue Ship. The reason for this is explained below in section 1.7.1 (about “back up” functionality).

**c - How many of these vessels were engaged in a RSS - Regular Shipping Service (according to Articles 313b to 313f CCIP)?**

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12 Member States responded that their ports were regularly visited by Blue Ships engaged in RSS, while five Member States stated that none of the Blue Ships that called to their ports were involved in Regular Shipping Services (RSS) at all on those particular voyages. Of the 253 Blue Ships, 55 were engaged in RSS and that out of the 26,000 total ship calls recorded during the operational phase, around 1,200 calls were made by ships engaged in RSS.

Two Member States did not answer this question.

**d - Did the "Blue Ship" vessels inform of their status upon arrival?**

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12 Member States responded that Blue Ships normally informed the customs authorities about their "blue" status upon arrival and that in many cases this was done through the local customs notification system or through other existing procedures. Conversely, 6 Member States stated that the Blue Ships visiting their ports did not make the customs authorities aware of their status upon arrival in the port.

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4 Regular Shipping Service (RSS) authorised according to Article 313b CCIP (Commission Regulation (EEC) No 2454/93 of 2 July 1993)
1 Member State did not answer this question.

**e - Did the notification reports arrive within 2 hours of a vessel's arrival?**

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13 Member States confirmed that reports did arrive two hours prior to the ship’s arrival, while only five responded that reports were not received two hours before the vessel’s arrival. In most of these cases, the report was received slightly before arrival (e.g. 5 to 15 minutes) or in few cases after the actual arrival of the ship in port (See section 1.5.1 for an explanation of this issue).

It is worth noting that the definition of actual time of arrival is not standardised and differs from port to port and from country to country, and this could be the cause of such inconsistencies.

1 Member State did not answer this question.

**f - Did you notice any missing data in the notification reports?**

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The majority of the respondents (12) confirmed that information contained in the notification reports was complete.

Six Member States noticed information missing in the reports. This sometimes related to the ship’s track toward the destination port, and sometimes to the information regarding previous ports, especially when the ship was coming from a non-EU country (this is possibly due to the fact that SSN does not necessarily contain this information).

Many of the comments received concerning "missing" information referred to information that was not intended to be part of the notification report. These will be further explained in the technical analysis of the project implementation below.

1 Member State did not answer this question.

**g - Did you experience any problem when receiving the Blue Belt reports via e-mail (e.g. filtered-out as spam, blocked by antivirus or antimalware software, etc.)?**

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Most of the Member States (18) reported no problems in this field. Some technical issues were encountered at the beginning of the project and were resolved. One Member State has reported persistent problems.
**h - Would you see the benefit to continue receiving the Blue Belt reports through email messages or would you find it useful to be presented through existing national customs systems?**

| 4 - by email | 15 - Reports via another method of delivery |

All Member States responded to this question. Generally they expressed an interest in continuing to receive the type of information that the Blue Belt reports provide. Nonetheless, some did not specify through which method they would wish to get the relevant information.

Four Member States would be happy to continue receiving the Blue Belt reports by email, pending the possibility to develop an integrated solution.

Furthermore, 15 countries indicated that the information has been used by customs authorities of the Member States in routine checks and operations. This provides a positive indication that the information contained in the Blue Belt reports is useful. Of these:

- 12 Member States would like to obtain this type of information through one of the existing systems, either the national customs system (where this exists), or other available applications (e.g. SafeSeaNet; customs data warehouses, etc.).

Additionally, but outside the scope of this question, six Member States expressed a wish to obtain the following further information through the Blue Belt reports (See Annexe 1 for further details):

- last non-EU port of call;
- tracks between previous ports;
- links to ship arrival information (declarations);
- unusual behaviour.

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5 The question invites the Member States to comment on how the information contained in the Blue Belt is delivered. The presentation is adapted accordingly.

6 The algorithm for monitoring “unusual” ship behaviour, according to the definition agreed to by the Correspondence Group, has been developed and is in test prior to being added to the notification report.
Summary of responses - Technical questionnaire:

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A summary of the main points highlighted by the technical responses is as follows:

- Most of the coastal EU Member States have been regularly visited by Blue Ships but only half of the ships informed customs authorities of their participation in the Blue Belt pilot project;
- Generally the blue belt notification report was received on time (two hours before arrival) though in some cases it arrived slightly before the arrival or in few cases too late in respect of the actual ship’s arrival. The cause of such inconsistencies may lay in the definition of actual time of arrival which differs from port to port and from country to country;
- Technical problems in accessing or reading the reports were encountered in very few cases and existing issues have been resolved;
- Cumulatively, there were around 26,000 calls from Blue ships at EU ports during the operational phase (5 May – 2 November 2011), of which around 1,200 ship calls were made by Blue ships whilst engaged in RSS;
- In very few cases information was missing from the Blue Belt Report. In the future the customs authorities would be interested in receiving more details about the vessel’s voyage in the report.

1.2.3. Operational questionnaire

The operational questionnaire was circulated at the end of November 2011 and invited the Member States’ customs authorities to answer questions on how the Blue Belt notification reports were used in the period May-November 2011.

The answers to this questionnaire will contribute to determining if the Blue Belt service provided useful information to the customs authorities, and whether the reports could be used to support customs procedures. The questionnaire also offered the Member States an opportunity to express their views on whether the Blue Belt reports should be integrated, both in terms of content and delivery, into the existing customs systems.
The results are based on 18 Member States providing responses.

**a - Please indicate how you used the notification reports.**

17 Member States used the reports provided by the Blue Belt pilot project regularly, and responded that these have provided timely additional information about vessels, primarily as a source of information for risk analysis. The information contained in the Blue Belt reports was compared with data provided by agents or with that found in tools supporting the national system, for example, to check IMO declarations, to check whether a vessel is registered in the Regular Shipping Services (RSS) scheme, to check the Authorised Economic Operator’s (AEO) License number relating to the shipment, to check the mandatory reporting that is required under the legalisation for facilitation of international traffic (FAL) forms, and to check the vessel status under the International Ship and Port Facility Security code (ISPS).

The reports were also used to compare voyage information with the information available in the national system, especially for the expected times of arrival. This allowed the ship’s route to be verified and helped to confirm if the Entry Summary Declaration (ENS) obligations had been fulfilled for ships bringing goods into the customs territory of the EU for the first time. When irregularities were noticed, the customs authorities took action as appropriate.

1 Member State responded that it did not use the reports provided by the Blue Belt pilot project, but had nevertheless used some of the information contained in the notification reports occasionally.

**b - Please indicate the impact of the report’s use in general, on Regular Shipping Service, on AEO or on authorised consignors.**

Six Member States reported an impact of the report’s use in general, on Regular Shipping Service, on AEO, or on authorised consignors. According to these answers, the impact of the Blue Belt service was related to using the information contained in the report to help the customs authorities with carrying out risk assessments, as the reports provide general monitoring information about the Blue Ships and confirmed a ship’s reported itinerary in addition to confirming data from other sources. The Blue Belt list of participating vessels was used to update RSS lists and to help identify ships of interest. A tangible impact of using the information provided was the reduction of inspections of RSS and ships operated by AEOs.

Six Member States reported no impact of the report’s use in general, on Regular Shipping Service, on AEO or on authorised consignors.

Six Member States did not respond.
c - Please indicate which information of the notification report was previously not available.

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Seven Member States indicated that the Blue Belt notification report provided new or improved information to customs authorities. In one instance, all the information contained in the report was new. Other improvements felt from the Blue Belt service include information about previous port(s) of call, delivery of an earlier warning than existing national systems, using the information in the reports to cross-check with existing data sources and to note irregularities and exceptions, as well as receiving collated information that previously had to be drawn from a variety of other sources.

Seven Member States reported that no new information was provided in the notification reports, as this was provided by a number of different external sources. However, it was recognised that the Blue Belt notification reports did provide a consolidated version of information that is needed by the customs authorities.

Four Member States replied that the Blue Belt provided no new information to them, of which one stated that the information received was already available via the national SafeSeaNet system.

d - Did the information included in the Blue Belt report effectively complement other information that was already available locally (e.g. FAL forms, ISPS notifications etc.)?

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12 Member States responded that the information provided in the Blue Belt was useful and that this complemented and helped with the quality assurance procedures in place to check the information which is used by the Customs Authorities obtained from other sources. It was also stated that the notification reports included information that was not previously available, namely ISPS-information, routeing of the ship, transshipment port and the last port of call via the enclosed nautical chart.

A number of Member States also said that the collated information contained in the Blue Belt notification report was easy to use and that previously similar information was available to the customs authorities but that this had to be retrieved from a number of different sources such as databases and websites.

e - How many cases have you identified where a notification report did not correspond to other information or facts?

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Five Member States did not identify discrepancies between information in the Blue Belt reports and information available from other sources.
11 Member States noted that the information provided in the Blue Belt reports did not always match information available from other sources. The differences between the Blue Belt reports and other information available to customs authorities were reported as follows:

- The late arrival of the report – instances when the report was not received within two hours of a ship’s arrival;
- The itinerary of ships did not always match the declarations provided by the ship’s master/agent;
- Occasionally vessels changed their itinerary and did not arrive at the port they had originally announced.

Two Member States did not respond to this question.

**EMSA Note:** When analysing the issue of reports arriving less than the agreed two hours in advance of a ship berthing, it was found that this was due to the geographic delimitation of port areas in certain EU Member States, and the attribution of their location codes (LOCODES) which are the boundaries drawn on a chart that trigger the sending of the notification reports. On the occasions when vessels changed the final port of destination and then did not arrive at the expected port, erroneous notification reports were generated. The cause of this was because the new arrival port was not registered in SafeSeaNet by the relevant party (the ship’s master/agent). The causes of these problems have been identified and resolved technically.

In the case of eight Member States, the information available through the Blue Belt service complemented and helped to confirm the information which is available from other sources. The information also helped with carrying out the risk assessment of the Blue ships. The routing information about a ship is considered to be a basic criterion for risk assessment and this part of the report was especially appreciated. In some Member States the information provided in the reports assisted customs officials involved in law enforcement to identify smuggling operations and, in some instances the information was shared with other maritime authorities (Port State Control; immigration services) to coordinate joint inspections of vessels.

Nine Member States reported that under the current conditions (both legal and procedural) targeting will continue to be carried out using other information sources. They also stated that for vessels operating outside the RSS, the Blue Belt reports contain useful information but additional data was still required in order to provide a more complete and reliable risk assessment.

It was widely suggested by both sets of respondents that in the future, integrating the Blue Belt information into existing databases would benefit risk assessment for customs authorities.
g - Did the reports facilitate customs processing and clearance, including confirming proof of Community status?

| 5 | 11 | 2 |

Five Member States answered that the information available through Blue Belt did help with some parts of customs procedures by complementing and helping to confirm the information which is available from other sources with regards to the ship’s particulars and the ship’s voyage.

11 Member States responded that the reports did not facilitate customs operations. This is because the Blue Belt reports do not contain information about cargo, and the means of confirming Community status are prescribed in existing legislation.

h - Did the reports provide assurances to customs for verifying the correctness of the vessel’s declared routing?

| 13 | 3 | 2 |

13 Member States reported that the Blue Belt reports provided assurances to the custom authorities with regards to the participating ships’ voyages and that the report was on time and accurate.

Three Member States reported that assurances were not always provided as some of the Blue Belt reports indicated that the previous port of call was unidentified (LOCODE ZZUKN).

i - Please indicate the type of information you would suggest for improving the concept?

The majority of the responses from the Member States indicated that they would be interested in fully utilising the Blue Belt notification reports if the following could be implemented:

i) The integration of information with other electronic systems and linking ships to cargo information:
   • Integration with the national customs systems
   • Integration with the IMO FAL documents

ii) To enlarge the scope of the service by providing reports concerning all ships trading in EU waters;

iii) To enrich the information on vessel’s voyage with more details such as abnormal behavior and third country port calls.

A detailed breakdown of the suggestions made by the Member States is available in section 3 below.
Summary of responses - Operational questionnaire:

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All but 1 Member State who responded used the Blue Belt notification reports and of these, 10 Member States found new information in the reports, the others found confirmation of other information obtained from existing sources.

12 Member States replied that the reports provided information that was used in the risk assessment process, either directly or when used in combination with other sources.

With regard to facilitation of customs processing and clearance, including confirming proof of Community status, eight Member States stated that the reports did not facilitate current Customs procedures, however five Member States indicated that the Blue Belt reports facilitated certain aspects of customs procedures.

Concerning the Blue Belt notification reports providing assurances to customs about the correctness of the vessel’s declared routing, most Member States indicated that the reports provided assurances and only one Member State stated that the reports did not provide any assurances.

Finally, the following suggestions were made on how to improve the Blue Belt service:

- To improve the automated information integration with other existing (national or other) systems and to include cargo information;
- To extend the service to include all vessels trading in the EU;
- To enhance the information about vessel voyages.
1.3. Monitoring results of the technical implementation by EMSA

1.3.1. Technical developments of the project

The technical implementation of the project was carried out in a number of different phases that progressively introduced functionalities and information into the Blue Belt service. The main service of the Blue Belt pilot project is the Blue Belt notification report, which is delivered to the customs authorities in ports via e-mail, two hours before the expected arrival of the vessel in the port of call. These reports are composed of two attachments: the voyage report and a screen shot indicating the Blue Belt ship track.

In order to compile and retrieve the voyage report there was a need to retrieve and compile the ship information and the voyage related details into the Blue Belt service from SSN. Customs specific data (such as Regular Shipping Services’ certificates, Authorised Economic Operator status, Authorised Consignor Status and details on shipping companies) was added to the SSN database.

![Image of Blue Belt notification report]

Figure 1. The Blue Belt notification report

Technically, the report generation to the port of destination is triggered by the receipt of a pre-arrival notification entered in SSN\(^7\) for a specific blue ship which is input by the Member States’ port authority in the ship’s port of origin. However, it was noticed that the pre-arrival notifications, although lodged, are not always uploaded to SSN, and that not all arrivals, despite being reported at local or national level, are shared through SSN.

To remedy this, and to ensure that the customs authorities would always receive a voyage report for any Blue Ship calling at their port, EMSA developed a back-up functionality. This feature “senses” the ship’s arrival in or departure from a port by using AIS position information, and tracks the ship when a

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\(^7\) Pursuant to article 4 of Directive 2002/59/EC of 27 June 2002, establishing a Community vessel traffic monitoring and information system and repealing Council Directive 93/75/EEC, the operator, agent or master of a ship bound for a port of a Member State shall notify the arrival of the ship at least 24 hours in advance. This information is shared among Member States through SafeSeaNet.
ship enters or departs a port. If a ship is detected entering a port, a Blue Belt report is sent to the customs authorities, even if a pre-arrival notification was not provided to SSN by the Member State maritime administration.

A nautical chart is included in the notification report, which shows the ship track toward the port of destination. Both smaller images representing terrestrial-AIS-based tracks, as well as larger drawings showing ocean-going vessels tracked through satellite AIS technologies can be displayed, and comprehensive passage charts are now being automatically generated for the participating Blue Ships.

Finally, a new category of users was created during the project implementation phase. For the first time, SafeSeaNet was made accessible to users not involved in maritime safety: the customs authorities. This led to the revision of some rules affecting the creation of regular users working outside the field of maritime safety in the system, though this did not affect the normal system operations by the maritime community in the Member States.

1.3.2. **Technical issues and problems noted during the project**

The Blue Belt notification reports have provided vessel particulars, customs relevant data and voyage information to the Member State customs authorities for Blue Ships. For waters outside the EU, the use of satellite-AIS has provided additional coverage. Though the Blue Belt reporting service was designed, developed, tested and deployed over five months, very few technical problems were encountered at the level of the central system.

Of the technical failures reported by the Member States with regards the reports’ contents and delivery, fewer than 100 incidents were recorded from the 45,700 reports sent during the period under evaluation. Most interaction with Member States was in order to answer questions related to the practical exploitation of the reports and to ensure data quality. The service has been running at more than 99% availability. Despite an overall appreciation of the Blue Belt service, some operational issues were reported.

*Identifying the relevant customs authority*

i) There were a few cases where a Blue Ship called a port where no custom authority had been assigned to receive the Blue Belt report for that port.

ii) In some cases, the infrastructure and terminals of different ports under the customs jurisdiction of a single authority given was incorrect and resulted in the wrong configuration in the Blue Belt service, which led to data loss.

*Timeliness of the reports*

i) The main comment regarding the timing of the report being received by the custom authorities was that occasionally the vessel in question had left the harbour before the report was seen or checked by customs. The reason for this was that the reports were generated for ships that arrived at night and thus out of regular working hours.

ii) There were other cases where the delivery time of the reports (two hours before expected arrival of the participating vessel) was not respected, meaning that the report was received by
the local customs authority slightly before the ship’s arrival (e.g. 15 minutes) or sometimes even after the ship’s arrival. In these cases, the reason for the difference in the arrival time of a ship is due to Member States’ definition of a ship’s arrivals and departure time, which may be different depending whether they were using national or port regulations. This led to different expectations with regards receiving Blue Belt notification reports. For example, a ship arriving at a river or channel port may, pursuant to the local regulations, be considered to have arrived at the moment she enters the fairway to the port. If the Blue Belt report is generated only two hours before arrival in the actual port (but after the entry into the fairway), this may result in the report being received after the legal ‘arrival’ of the vessel.

iii) In the case of one Member State, there was a systematic error concerning the arrival times. This was because the difference between the time zones and seasonal variations were not taken into account (summer time/winter time) as the ship reporting systems operate on UTC. However, it was requested that in future the reports be sent according to local time.

**Multiple reporting**

The Blue Belt report was generated and sent once a pre-arrival notification was registered in SafeSeaNet. When a change occurred to the ETA for the same ship’s voyage, a new message was generated and sent to the relevant customs authority. As the pilot project sends e-mail reports, multiple reports received for one vessel were considered to be inconvenient by the local authorities involved. The reporting solution should be rationalised in order to avoid burdening to the receiving user.

Based on these comments, a better alignment of technical implementation to operational procedures would improve the reliability and precision of the service.

**1.4. Monitoring results from the shipping industry**

The shipowners’ representatives were invited to provide feedback and comments throughout the project. This was collected by the European Community Shipowners Association (ECSA) and the World Shipping Council (WSC) on a monthly basis from the shipowners, the ship’s masters and their agents. The shipping industry identified the 253 ships that are participating in the Blue Belt pilot project. Their feedback gave indications of the impact of the project by monitoring the way these participating ships were treated at port level by the customs authorities during the project as compared to the situation before the project.

In terms of awareness of the project, the shipowners noted a lack of awareness from local customs of the Blue Belt pilot project and of the “Blue Ship” status in a large number of ports in EU Member States. Despite noticing the political interest at EU and central customs level for the Blue Belt project, there was a perceived lack of engagement at local/port level. Thus no change in procedures was experienced by the participating ships and no improved customs processes were offered. The shipping industry also noted that no benefits had been felt by participating Blue ships, regardless of their status or type of service.
Despite this, some benefits of the project as a whole were recorded. From the industry perspective, there was an interest in finding out how customs used the Blue Belt notification reports and whether these reports create any added value for customs. Furthermore, the industry felt that the information provided to the customs authority through the pilot project provided them with data that they did not have access to previously, and that the Blue Belt reports could better inform customs officials about ships particulars, status and voyage. The industry felt that the information provided during the Blue Belt pilot project demonstrated to customs that the movements of the participating vessels can be verified, and provides evidence that the vast majority of ships have normal behaviour; the information provided to customs should give them confidence about the movements of the ship (and the cargo on board the ship) which in turn creates an incentive to simplify customs procedures, especially regarding proof of Community status.

1.5. Monitoring results from the ports

The European Sea Ports Organisation (ESPO) collected data from a selected number of ports that most frequently handle vessels engaged in intra-EU trade. ESPO requested port authorities where Blue Ships called to examine and report on:

i) Whether there was awareness and understanding of the pilot project at local level, in particular by the local customs administration;
ii) Whether the project has gained support at local level from customs authorities, and;
iii) If any benefits have been noticed in practice (either by customs authorities or by Blue ships) for operational procedures for the participating vessels.

The Port authorities responded that awareness of the project at local level by customs authorities had improved in the latter part of the pilot project in comparison to the beginning of the project. In some Member States however the port authorities stated that the local customs authorities had not been properly informed by the national customs authorities about the Blue Belt project and its objectives. The ESPO members also stated that the project has provided some positive benefits, and had provided the opportunity for communication between the customs authorities at local level and the port and shipping representatives.

Concerning the operational aspects of customs clearance procedures, the port authorities reported that the information sent to the customs authorities through the Blue Belt reports was very occasionally inaccurate (e.g. reports sent for vessels that did not arrive at the port) and in some cases the email was not received in advance of the arrival of the vessel.

Despite this, from discussions at port level, the ports reported that the customs administrations have now more certainty about the voyage and itinerary of the participating Blue Ships. This is because the information coming from the EU maritime monitoring and information system SafeSeaNet is considered to be reliable. Unfortunately, the advantage of this information has been limited to the 'Blue Ships’ during the pilot project, and it was felt that information on all ship arrivals would be
useful. It was expected that ship captains and ship agents would benefit from the fact that if customs officials can use this accurate information for carrying out the risk assessment, this would normally lead to a quicker handling of formalities concerning the ship cargo by customs. However, in general, no tangible benefits were perceived by the actors involved. In this regard, there is still insufficient information about the goods (in particular for intra-EU cargo). The ports called for:

- improvements of the information sent via the Blue Belt service, and
- changes to the customs procedures in order to speed up processes at port level.

In summary, the ports stated that the Blue Belt report did not lead to simplifications of existing customs formalities and procedures that the shipping agent and ship’s master must follow.

Finally, the type of information provided by the Blue Belt report is already available to some ports. In future developments, attention should be paid to existing information systems, such as port community systems (PCS) which are available in a number of ports and already provide comprehensive information to customs (e.g. ports of call, vessel information), in order to avoid duplication of systems.
2. Analysis of the results

2.1. Operational and technical considerations

This section presents an analysis of the findings of the questionnaires from the Member States and industry, and interprets them within the context of the project aims. The project aims are the specific goals that were defined in the project implementation plan (PIP) and agreed to by the European Commission and EU Member States customs authorities. The technical implementation of the Blue Belt pilot project allowed the testing and measurement of these aims in an operational environment, albeit on a reduced scale which was limited to the participating vessels.

The following analysis will help to identify any additional actions required in order to achieve the broader objectives of the Blue Belt concept.

2.1.1 Project aim 1: A ship can be effectively tracked when sailing between two EU ports, even when it sails outside Member States’ territorial waters

The Blue Belt pilot project successfully demonstrated that it is possible to provide information about a ship which is useful and relevant to customs authorities: the information provided relates to the ship’s particulars, whether the vessel is authorised for a Regular Shipping Service and voyage information. These were generated automatically. The source of the information included: information from the EU Member States maritime authorities, commercial register of vessels, the shipping industry, and customs registers. The attachment with the nautical chart enclosed which shows the plot of the ship’s voyage was particularly appreciated.

Vessel positioning information was also included, which came from AIS (and, as of November 2011, satellite AIS for voyages outside EU waters). The constant monitoring of vessels provides a complete voyage track and ensures that the ships and their cargoes remain under customs supervision.

Furthermore, from February 2012, unusual vessel behaviour monitoring is included in the notification reports, in order to help the customs authorities with their risk assessment.

The inclusion of these two information elements (satellite AIS and unusual behaviour monitoring) needed a special approach in order to obtain the data, process it, and deliver it to the customs authority in a meaningful way. In the case of satellite AIS for the participating vessels, an agreement was concluded with the European Space Agency whereby they provided the data stream to SSN. With regards to the ship behaviour alert information, an algorithm was developed to automatically detect unusual behaviour as defined by the Blue Belt correspondence group and advisory group.

The project also demonstrated that the notification reports could be delivered within the agreed timescale requested by the customs authorities.

Outstanding issues

The Member States also mentioned that the itinerary of ships and their next port of call was not included in the notification report. Although these elements were not foreseen in the Blue Belt reports,
this additional information is regarded as useful and should be taken into account for any further development of the service.

On some occasions, a report was generated for a participating vessel and sent to the customs authority, but the vessel did not arrive at the port.

In terms of vessel voyages under the RSS, at the beginning of the pilot project two vessels that were voyaging under RSS status were detected travelling between EU and Norway (a non-EU State), which is not permitted in the RSS scheme.

2.1.2 Project aim 2: Information about a vessel’s voyage given to customs authorities can be of assistance for implementing existing legal provisions with more confidence

From the results of the questionnaires, it can be stated that the reports have provided additional information on vessels that was not previously available to the customs authorities, and that the reports have helped with quality assurance when cross-checking against data received from other sources. This information can be used in future to support the implementation of existing legal provisions where the aim is to simplify operational procedures by customs for ships trading in EU waters.

The type of information that was reported of benefit to the customs authorities is clustered according to following categories of usage:

Data comparison
The Blue Belt reports allowed the customs authorities to compare with data provided by agents or with data found in tools supporting the national system customs system. For example, the Blue Belt reports were used as a reliable source of information with which to compare IMO declarations which were received on paper. In some Member States, all the information contained in the Blue Belt report was new.

Receiving and using the Blue Belt information enabled the detection of irregularities and exceptions with regards to declarations made by ships, which allowed for appropriate action to be taken by the customs authorities.

Support to risk analysis
The Blue Belt reports were frequently used for carrying out risk assessments as the information contained in them was compared with information received through other sources. When information contained in the Blue Belt report confirmed information received through other channels and no risks were detected, customs clearance procedures were carried out with a greater degree of assurance.

The information concerning the routing of ships is a basic criterion for risk assessment; as such the voyage information was particularly appreciated by the customs authorities.

The information was also useful to help identify vessels of interest to the Customs authorities.
The Blue Belt reports were sent to other maritime authorities (Port State Control; immigration services) to coordinate joint inspections of vessels.

**Voyage information**

The Blue Belt notification reports provided information about a ship’s last voyage, the previous ten ports of call and the estimated time of arrival (ETA) and actual time of arrival (ATA) of a given vessel. This was compared with the information available in the national system, especially the charts, and helped to check the accuracy of the national systems.

The Blue belt voyage information allowed the customs authorities to confirm the ship routing and check if Entry Summary Declaration (ENS) obligations were fulfilled. It was also indicated that the Blue Belt reports provided an earlier warning of ship arrivals than existing national systems. Furthermore, the notification reports were a point of reference to establish vessel itineraries and previous port(s) of call, as well as to obtain information about transfer routes and ports which was previously unavailable.

It was suggested that the information provided in the Blue Belt reports could be used more effectively in the future if it is integrated into existing customs databases.

**Outstanding Issues**

Currently customs officers in some Member States see only a limited advantage in the information received from notification reports as targeting for risk assessment is based on other sources of information. It was also felt that there is not enough information available provided in the Blue Belt notification reports to carry out a complete risk assessment of ships which were not on scheduled voyages. However, ships travelling on unscheduled voyages were outside the scope of the pilot project, but this comment will be retained in future discussions.

Moreover, some customs authorities were not able to fully use the notification reports as these were delivered at central level, and not sent regularly to local customs offices. In one case, the reports were not used at all because the information provided was already available through the existing national system (e.g. the national SSN system).

Finally, the MS clearly stated that the operational procedures used by customs were not changed or simplified, despite the Blue Belt pilot service, as they stated that the current customs legislation does not allow this.

**2.1.3 Project aim 3: Receiving more accurate scheduling information on a ship’s arrival and departure can contribute to improve efficiency in allocating resources for carrying out customs procedures.**

This project aim was included to assess whether the blue belt notification reports, especially the advance warning of actual ship arrivals, could help Member States with the management of resources for carrying out customs operations. The Blue Belt reports improvements in scheduling information
could help with planning of customs procedures and help vetting of vessels whereby physical checks of ships could be avoided if sufficient information is available.

**Accessible Ship information**

Most Member States customs authorities stated that the Blue Belt reports helped to monitor the participating ships as information about vessel voyages was not previously available to them; this also gave insights regarding how a vessel’s voyage could be tracked.

The notification reports were also said to be very convenient as they regroup information that had previously been available from many sources into one report and were easy to interpret and use. In some cases the information delivered by the pilot project was already available but needed to be extracted from other databases, on other sites, etc.

The information available through Blue Belt also complemented and validated information available from other sources in order to check and confirm reported itineraries and provided confirmation of the ETA. It was suggested that in order to facilitate the work of shipping agents when updating the ETA of a given vessel, sending them the Blue Belt report would also be useful.

Overall, the reports helped to reduce the workload of customs officers at port level by delivering collated information in useful manner (i.e. by providing consolidated information in one document).

**Support to operations**

In some Member States, when the customs authorities planned checks of a vessel, the Blue Belt notification reports were used for additional information gathering. This was done by comparing the information provided by the Blue Belt reports with the items on a standard customs checklist:

- Did the information arrive on time, two hours before ETA?
- Compare and control the ETA with the ATA.
- Is it a RSS or not?
- Check the route followed, especially when it’s a RSS
- Is it operated by an AEO or not? If so, check the AEO licence number.
- Is the travel time reasonable\(^8\) between the port of departure and arrival?
- What was the previous port of call as indicated by the notification report, how does this compare with other information provided such as data (general declaration, licence, electronic FAL message, ISPS).

\(^8\) The term “reasonable” in this context is not defined according to fixed criteria and subject to the judgement of the officer carrying out the risk assessment and the relevant guidelines in the MS, where available. Using Blue Belt reports as a supporting tool, Custom authorities can accurately estimate the expected voyage time of a ship between two ports, barring any unforeseen event, and thus request clarifications from a ship’s master if the journey took substantially longer than the estimate.
When a discrepancy was noticed, customs gave the order for the vessel to be checked. With regards to improving efficiency in allocating resources for operations, the Blue Belt reports helped to confirm data from other sources, leading to fewer inspections of RSS and AEO ships, and help to target which vessels (and cargo) should be checked.

Quality assurance

It was also reported that the Blue Belt notification reports have helped with internal quality assurance of current customs systems and procedures. This was done by comparing the data contained in the reports received about a Blue ship and benchmarking this against sets of ship arrival information in the national customs system. If irregularities were noticed, then appropriate action was taken.

The Blue Belt reports were also useful in providing ISPS-information about the participating vessels which was not available in many of the national customs systems. It is anticipated that this information will become available following the implementation of the EU Regulation (2010/65) that deals with reporting formalities for ships (FAL). 9

According to the Member States, an unexpected consequence of the project was the opportunity provided to the customs authorities to update their RSS lists, as the RSS information provided via Blue Belt was updated and distributed on a more frequent basis than via the existing channels.

Outstanding Issues

Despite an overall appreciation of the Blue Belt service, some issues were reported.

Many Member States indicated that other sources are used as a complementary tool to obtain information about location of vessels, their arrival/departure from/to ports globally, and as such the Blue Belt reports did not contain sufficient information on vessels sailing from ports outside the EU. In one Member State, all information about vessels, including the time of their arrival, is received by Customs from an existing port skipper service through a port information system.

With regards to timeliness, occasionally the vessel had already left the harbour before the report had been read by customs. The reasons for this were either because the notification report arrived too late or because the vessel and the report arrived in the middle of the night and thus out of working hours of the service. In some cases, the ETA and ATA reported by the system for some of the vessels was not always accurate.

In the case of one Member State, a systematic error concerning the arrival times of vessels was noticed. This was because the difference between the time zones and seasonal variations are not taken into account (summer time/winter time) as the ship reporting systems operate in UTC. However, it was requested that in future the reports are sent according to local time.

9 DIRECTIVE 2010/65/EU OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 20 October 2010 on reporting formalities for ships arriving in and/or departing from ports of the Member States and repealing Directive 2002/6/EC
2.1.4 Project aim 4: To demonstrate the economic importance of the project for maritime trade between EU ports and the effect on the modal split of transport between ship, rail and truck.

It was reported by the Member States and by industry that the Blue Belt pilot project did not have an impact on maritime trade or lead to the simplification of customs procedures at port level. The reason stated for this is due to the existing legislation and procedures in place have not changed.

2.1.5 Summary of findings

- The majority of Member States indicated that the reports provided assurances about the correctness of the vessel’s declared routing.
- The project has however demonstrated that the information provided by the notification reports can be used to support customs operations and may be a component offering assurances to customs authorities that can support risk assessments.
- Finally, further improvements to strengthen the Blue Belt service have also been suggested by the Member States and are described in the next section.

2.2. Legal gap analysis

A small group composed of Member States customs authorities and the shipping industry volunteered to carry out an analysis of the current legal framework in order to see what measure can be proposed to meet the objectives of the Blue Belt concept.

The work of the group was to identify the current rules and obstacles that prevent offering facilitations to vessels carrying goods between EU ports and then report their findings to the Blue Belt pilot project stakeholders (Commission and Member States).

The legal gap analysis contains some recommendations to amend the legislation so that Member States can carry out simplified custom procedures for intra-EU shipping additionally to existing provisions.

The findings of the report will be presented separately.

2.3. Analysis of the Blue Belt pilot project from the shipping industry’s perspective

The representatives of the shipping industry were invited to make comments on the impact of the Blue Belt pilot project. Their statements aim to reflect the experiences of the vessels participating in the project and also take into account the responses of the Member States. This approach contributes
to providing a balanced view of the project and helps to ensure that the views of the relevant stakeholders are taken into account in the evaluation.

**Question D:** *Did the information included in the Blue Belt report effectively complement other information that was already available locally?*

When noting the majority of positive responses to this question from the Member States, the industry representatives agreed that the Blue Belt project succeeded in providing confirmation of the information available from existing sources used by the Member States. The shipping industry was encouraged that several Member States also came to this conclusion, and believes that the Blue Belt service has, by filling the information gap about vessels and their voyage, reinforced the level of trust felt towards the industry by the Member States.

**Questions F and G:** *Did the report help with the risk assessment tools at national level, and consequently help target shipments carried on ‘Blue Ships’ for inspection? Did the reports facilitate customs processing and clearance, including confirming proof of Community status of the goods?*

The section below contains an edited version of the responses provided by the industry representatives.

Regarding questions (F) and (G), it was noted that one of the aims of the Blue Belt pilot project was to provide additional certainties to the customs authorities by improving the quality of information available to them by complementing existing sources of information used for risk assessment and for customs procedures. This was confirmed by the answers provided by the Member States to both questions. It can be stated that the project has demonstrated that information about ships and their voyages is useful to customs authorities.

A similar argument is used in response to question (F) which stated that the Blue Belt notification reports do not contain “enough information” to carry out a risk assessment: the intention of the Blue Belt project was not to use these reports as the sole element of a risk assessment, but to confirm other available information on the itinerary of a ship and its cargo when sailing between two EU ports.

Using the Blue Belt pilot project’s evaluation results as a starting point, discussions should begin with the customs authorities of the EU Member States that should aim to find an acceptable way in which to further facilitate the processes for ships carrying goods between EU ports and to create a level playing field for the shipping industry when trading within, to or from the EU. This was an objective of the Blue Belt concept and the pilot project was able to demonstrate that this could be achieved. In this regard, the outcome of the trial can be perceived as successful.

### 2.4 Findings from the analysis
Drawing from the questionnaire responses of the Member States, comments received during the meetings of the Electronic Custom Group (ECG), the discussions held during the Correspondence Group & Advisory group meetings, and the comments received from the shipping industry, a number of findings can be highlighted.

The pilot project achieved most of the project aims. For project aim 1, the Blue Belt notification reports have provided vessel voyage information to the Member States for their voyages. For waters outside the EU, the use of satellite-AIS has provided additional coverage.

For project aim 2, the extent of the information provided about vessels and their voyages has been useful, timely and relevant for the customs authorities. To this extent the pilot project has helped to improve efficiency and to give sufficient reassurances to customs about a ship’s voyage.

Furthermore, nearly all Member States used the Blue Belt notification reports regularly and the quality of the reports was sufficiently high for these to be relied upon to support their risk assessments.

With regards to project aim 3, where receiving more accurate scheduling information on a ship’s arrival and departure can contribute to improve efficiency in allocating resources for carrying out customs procedures, the Blue Belt reports have provided new information to the Member States’ customs authorities and helped to confirm information provided through other sources. This has strengthened the information available and supported the tools available to them to carry out their tasks. The information provided via the Blue Belt service has also helped to improve efficiencies by enabling more accurate ship targeting which has allowed a better use and allocation of staff resources.

And finally, project aim 4 which was to demonstrate the economic importance of the project for maritime trade between EU ports could not be achieved.

Following the analysis of the results within context of the project aims, the tables below present the responses by the Member States to the project monitoring questionnaires.

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<tr>
<th>Question</th>
<th>Answers that show the project aims were met</th>
<th>Answers that show the project aims were not met</th>
<th>Inconclusive responses about meeting the project aims</th>
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### 2.5 Summary of the evaluation

The pilot project has demonstrated that it is possible to deliver accurate and timely information about vessel voyages to customs and that indeed this information is useful and that can support customs procedures.

The pilot project did not lead to simplifications in customs procedures for ships sailing between EU ports as the current legal framework has remained unchanged and, for similar reasons, it did not lead to any improvements for ships trading in the EU as called for by the EU Council.

At the request of the Member States, the services delivered by the Blue Belt pilot project should continue whilst the legislative issues are addressed.

Further enhancements of the service are desired by the customs authorities, such as the integration of the Blue Belt service into the existing customs systems as well extending the scope of the Blue Belt service to provide additional information about all ships trading in the EU (See Annex 1 for a more detailed set of suggestions or “Additional Considerations”).

Any technical developments of the Blue Belt service which help the Member States carry out customs procedures should be supported by legislation which simplifies procedures and offers facilitations for the shipping industry whose vessels are engaged in trade in the EU by keeping the Community Goods status when sailing between EU ports.
Annex 1 - Additional considerations

1. Technical considerations

Additional suggestions were made by the Member States which were not part of the questionnaire on how to improve the Blue Belt service with regards to the contents and access to the Blue Belt notification reports. These are:

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| Integration with other systems     | - To incorporate the electronic information of the Blue Belt messages based on the WCO-data model\(^{10}\), into existing the customs systems;  
- To obtain the type of information provided via the Blue Belt service through one of the existing systems, either the national customs system (where this exists), or other available applications at EU level (e.g. SSN; customs data warehouses, etc.);  
- To ensure that the information would be provided only electronically and processed automatically, in order to allow updates and to avoid multiple notifications;  
- To take into account the work of related issues such as the eMS Customs Subgroup created in the frame of the reporting formalities for ships arriving and departing (Directive 2010/65/EU) when deciding possible future improvements of the Blue Belt service;  
- To consider to take steps at EU level to establish one system;  
- To make the system available to all relevant agencies which would use the data (Maritime Authority, Customs, Border Police etc).  
- To integrate ISPS into SSN and BB with a short signal frequency ISPS; |

The following two points stood out:

- The customs users want to receive the Blue Belt information through a system-to-system connection, in order to gather ship and voyage information from traffic monitoring systems and display this information on their own customs applications;
- It is advisable to keep the capability to deliver such information in email reports, either as an alternative solution or as an option to be exploited by those countries which choose to not develop a system-to-system connection.

Any development would need to take into account exiting tools or those in development at local, national and European level that will need to be taken into account.

\(^{10}\) See the “WCO Data Model, Single Window Data Harmonisation” (Ref: http://www.wcoomd.org/files/6.SW_Files/Data_Harmonisation.pdf.)
2. Operational considerations

From the responses to the questionnaire and comments received from the Member States (ECG and CG) as well as from the comments made by industry, the Blue Belt service did provide information to the customs authorities that supported operational procedures. The Blue Belt service, by providing ship information in advance, helped customs authorities with their planning and targeting of ships for customs processing. In some cases, these efficiency gains created synergies with other port authorities, enabling coordinated customs, port state and other inspections.

Furthermore, albeit outside the scope of the Blue Belt pilot project, it was realised that a Blue Belt service could improve operational procedures by providing information that would help coordinate customs operations between different Member States in order to avoid missing inspections or duplicating them. Additional suggestions were made by the Member States, but not part of the questionnaire, on how to improve the Blue Belt service with regards to the notification report contents and delivery. These are:

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| Cargo information | - To include consignee/consignor and goods item level data in the reports by linking the notification reports to the ENS, where available;  
- To link/include cargo manifests and customs status of goods;  
- To provide information on the licences of operators. |
| Vessel information | - To extend the scope of the service to all ships calling at EU ports;  
- To include the previous port(s) and the entire route of the vessel in the report including the last non-EU port of call;  
- To include reports of the blacklisted Ships;  
- To include information of the unexpected ship behaviour;  
- To offer an indication of serious differences between ETA & ATA when they arise\(^\text{11}\);  
- To have access about the ships voyage and behaviour outside of the European Maritime Space and the continued use of satellite AIS information;  
- The access to and the use of satellite images for targeted ships for customs inspections;  
- To include information about the vessels declared next port of call, this could be checked against the actual next port of call of the ship upon its arrival;  
- To include an alert and information about vessels that switch off their AIS transponders;  
- To include the IMO FAL documents. |

\(^{11}\) As footnote 7. If this is to be included in the BB notification report, criteria defining “serious difference” will need to be agreed to.