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**REPORT FROM THE COMMISSION TO THE EUROPEAN PARLIAMENT AND
THE COUNCIL**

**pursuant to Article 14(3) of Regulation (EU) 2019/880 of the European Parliament and
of the Council of 17 April 2019 on the introduction and the import of cultural goods (28
June 2023 - 29 June 2024)**

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GLOSSARY

Business Case	The document that provides the IT project justification and defines its budgetary requirements.
Vision Document	The Vision Document elaborates on the assumptions made in the Business Case Document. It records the system owner/system supplier partnership and understanding of the system at the time of writing.
Project Charter	The Project Charter replaces the Vision Document as per the alignment with the Commission PM2/Agile methodology. It records the system owner/system supplier partnership and understanding of the system at the time of writing.
ICG system	Import of Cultural Goods system - the centralised electronic system for the import of cultural goods.
TRACES	Trade Control and Expert System - the European Commission's multilingual online platform for sanitary and phytosanitary certification. It will also host the ICG system.
EU CSW - CERTEX	EU Customs Single Window - Certificates Exchange.
MFF	Multiannual Financial Framework; the EU long-term budget, running from 2021 to 2027.
BPM	Business Process Model - the application-level Business Process Model describes the entirety of the business process and flow of information for an application, completing the System Business Process Model created during the “System Specification” phase, to take into account the application’s own needs.
BAC document	The Business Acceptance Criteria document
PQTM	Proximity Quoted Times and Means

1. INTRODUCTION

Regulation (EU) 2019/880 of the European Parliament and of the Council of 17 April 2019¹ on the introduction and the import of cultural goods (hereafter “the Regulation”) aims to prevent the illicit trade in cultural goods, in particular when it contributes to the financing of terrorist activities, and to prohibit the import into the customs territory of the Union of cultural goods exported illegally from third countries.

The Regulation subjects the import of certain cultural goods that are considered to be particularly endangered (namely, archaeological objects and parts of monuments that have been dismembered) to import licences and others, which are considered less endangered, to importer statements and ensures that they undergo uniform controls when imported into the Union. Certain imports of cultural goods that are intended for specific uses (educational, scientific or research-related) are exempted from these documentary requirements.

The obligation for importers to obtain an import licence or draw up and submit an importer statement to customs will only start to apply from the moment that a centralised electronic system (the ICG system) will become operational.

The ICG system will not only serve as a means for the accomplishment of formalities by operators, but also for the storage and the exchange of information between Member States administrations in charge of implementing the Regulation (customs and cultural authorities).

The functioning of the ICG system depends on the EU Single Window Environment for Customs established by Regulation (EU) 2022/2399², which provides a legal basis for the functioning of the EU CSW-CERTEX.

The EU CSW-CERTEX represents the central component of the EU Single Window and is developed by the Commission to link the national Single Window Environments for customs to Union systems or databases managing non-customs requirements so that all relevant authorities can access the relevant data and collaborate more easily on border checks.

Every 12 months from the entry into force of the Regulation and, until the ICG system becomes operational, the Commission is to present a report to the European Parliament and to the Council on the progress made with establishing this electronic system.

The first Commission annual progress report³ outlined the action taken by its services during the first year after the Regulation entered into force, namely: (a) the preparatory work for adopting the necessary implementing provisions, and (b) the consultations with the Member States via the Expert Group for customs issues related to cultural goods and the Project Group for the import of cultural goods.

The second Commission annual progress report⁴ presented the progress achieved with the adoption of the Commission Implementing Regulation (EU) 2021/1079⁵, as well as the roll-

¹ OJ L 151, 7.6.2019, p. 1–14

² Regulation (EU) 2022/2399 of the European Parliament and of the Council of 23 November 2022 establishing the European Union Single Window Environment for Customs and amending Regulation (EU) No 952/2013 OJ L 317, 9.12.2022, p. 1–23

³ [COM\(2020\) 342 final](#)

⁴ [COM \(2021\) 358 final](#)

out of Phase 1 – ‘Conceptualisation’ of the ICG project, the work carried out by the Project Group created for this purpose and the advancement of the Business Case and the Vision Document for the ICG project.

The third Commission annual progress report⁶ covered the finalisation of the first version of the package of Business Process Models for the ICG system; the finalisation of the Business Acceptance Criteria (BAC) document; and the creation of user stories and their alignment with the BAC, verifying the information needed for the developers to estimate and implement the functionalities necessary to meet the requirements.

The fourth Commission annual progress report⁷ covered

(a) the start of developing the ICG system, i.e. the first internal releases, encompassing the general functional infrastructure, as well as the core workflows.

(b) the extension of the core functionalities to the complete management capabilities and the definition of new functional concepts such as the simplified procedure to obtain an import licence for subsequent imports; applying for an import licence that covers multiple objects, splitting a licence application; or the ICG third countries law compendium feature (the Library).

(c) the launch of business activities for the EU CSW-CERTEX integration, so that import licences or importer statements are accessible to customs via the EU CSW-CERTEX.

The present fifth annual progress report covers the period from July 2023 to June 2024. **This will be the last report before the ICG system becomes operational in the 2nd quarter of 2025.** For the sake of completeness, the objectives to be met, the project architecture and the planning approach, which are detailed in previous progress reports, are also briefly mentioned here. The overall assessment of the progress made and the identified risks for delay are summarised in the conclusions section of this report.

2. OBJECTIVES TO BE MET

The ICG system is to become operational by 28 June 2025 at the latest, as on that date, it will become mandatory for all operators to obtain import licences or submit importer statements to customs through that electronic system, in order for them to be able to import⁸ legally specific categories of cultural goods into the Union.

The project is currently at its third phase, as most of the development has been completed and the interconnection of the ICG system to the EU-CSW CERTEX is well underway. In parallel, training sessions are organised to familiarise Member States administrations with the ICG system’s operational functionalities.

⁵ Commission Implementing Regulation (EU) 2021/1079 of 24 June 2021 laying down detailed rules for implementing certain provisions of Regulation (EU) 2019/880 of the European Parliament and of the Council on the introduction and the import of cultural goods; OJEU L 234 of 2.7.2021, p. 67.

⁶ [COM\(2022\) 580 final](#)

⁷ [COM\(2023\) 758 final](#)

⁸ The Regulation defines as ‘import’ the placement of goods under the following customs procedures: release for free circulation; storage in customs warehouses or free zones; temporary admission; and end-use, including inward processing.

The project on the import of cultural goods is also planned in detail through the Multi-Annual Strategic Plan for electronic Customs revision 2023⁹ (MASP-C Rev. 2023 v1.0). An excerpt of the planning of the project on the import of cultural goods from MASP-C rev. 2023 is provided in Annex I to this report (table 1 – Consolidated fiche 1.18 ‘Digitalisation of Cultural Goods’), as well as an excerpt of the planning of EU CSW-CERTEX rev. 2023 from MASP-C Consolidated Fiche 1.13 (table 2).

3. PROJECT ARCHITECTURE AND PLANNING APPROACH

As explained analytically in the first annual progress report, the Project Architecture is based on the methodology provided for in MASP-C rev. 2023 and its Annexes, including the Governance Scheme, the EU Customs Business Process Modelling Policy and the IT strategy. A comprehensive roadmap, with the main project phases and the critical milestones is detailed in Annex II.

Despite of the project progressing on several levels at the same time, it can be figuratively divided into three main phases:

Phase 1 – Conceptualisation Initially, a Business Case is prepared, providing the project justification and defining budgetary requirements. Further, the Level 3 (user requirements BPMs) and Level 4 (functional requirements BPMs) are produced, followed by a Vision Document, which provides more detailed information on the project definition in terms of architecture, cost, time, and risk, as well as information such as milestones, deliverables and project organisation.

Phase 2 – System development Based on the provisions of the implementing act, the user requirements and the functional specifications for the system, technical specifications on how the system will be constructed are developed.

Once the design of the system is ready from a conceptual perspective and the deliverables listed in Table 1, Milestones 1 and 3 (see Annex I) are produced, a more in-depth work begins and more technical aspects are taken into account in the Application & Service specifications and Technical System Specification documents (concretisation of the Business Case and the Vision Document). The ICG is to be integrated in the existing TRACES platform and therefore it will reuse to some extent the existing specifications, architecture, messages and interface.

Phase 3 – Deployment and Operation The actual IT development phase (Construction Phase) begins, which is followed by a Transition phase where the early versions of the ICG system will be gradually rolled out to the different groups of users and tests are performed to ensure that, by 28 June 2025, operators and competent authorities are capable and well trained in the use of the system. Then a 6 months after-care period will follow, during which the system will be fine-tuned to match any operational needs that may become evident only after the use of an IT system becomes mandatory, and to ensure that operations are running smoothly.

As the ICG system will be interconnected with Member States’ customs systems via the EU CSW-CERTEX, this activity will require Conformance Testing. While the date of interconnection was originally foreseen for 3 March 2025, the Commission has prepared an

⁹ https://taxation-customs.ec.europa.eu/customs-4/electronic-customs_en and MASP-C [Annex 2](#)

amendment to the EU SWE-C Regulation in order to align the applicability date with that of Regulation (EU) 2019/880, i.e. by 28 June 2025 at the latest.

4. PROGRESS OVERVIEW

Project development

During the reporting period there has been substantial progress in the development of the ICG system, as well as with regard to its integration with the EU CSW-CERTEX. Throughout the reporting period, collaboration with Member States has been a top priority. To ensure that their input and feedback would contribute to the system's continuous improvement and successful implementation, several work meetings were organised. Those have taken place both on a bilateral basis and within the Project Group on the Digitalisation of Cultural Goods.

Early feedback from Member States has been invaluable in refining the system, allowing the Commission to address concerns and incorporate suggestions effectively. Four live demonstrations of the ICG system have taken place throughout this reporting period, during which Member States played a pivotal role in providing feedback and insights. Early engagement with them facilitated the gathering of valuable feedback on prototypes and functionalities, allowing for iterative improvements based on real-world usage scenarios. This collaborative approach not only enhanced the usability of the system but also fostered ownership.

Progress continued on both business and technical fronts for the ICG system and specifications were adapted to meet the evolving needs. By keeping these specifications up-to-date, the project ensured that it remained agile and responsive to changing requirements. Strong focus was placed on testing the system in view of identifying and anticipating potential problems while enhancing the user experience and reducing the chances of critical issues that may occur post-deployment. Integration efforts with the EU CSW-CERTEX system continued to be a priority to ensure that the customs control objective would be operational as per the legal deadline of 28 June 2025.

During the reporting period the Commission has also been developing training modules on the new import rules and the ICG system, as well as a user manual for the ICG system. The design of the training materials and the development of the user manual underscore the project's commitment to ensuring that end-users are equipped with the knowledge and resources needed to leverage the system effectively. With regard to training materials, two modules are being developed: one for competent authorities and importers and the second for customs.

Notable progress was also made in the development of the ICG compendium comprising succinct profiles of third countries' legislation on export requirements. The so-called Library feature of the ICG system aims to assist competent authorities, importers and customs in informing themselves on the exact requirements for exporting cultural goods legally out of third countries. To this end, extensive efforts were dedicated to refining and fine-tuning the template to ensure that it accurately captures the relevant legal provisions and other key details of the third countries in question and the first 12 profiles were drafted. The exercise continues with the preparation of more country profiles, in close cooperation with the

International Council of Museums (ICOM), in particular regarding countries for which a Red List has been issued by that organisation.

In parallel, by embracing emerging technologies, the project aims to remain at the forefront of innovation by exploring the potential integration of AI-driven functionalities for the identification of cultural objects.

Methodology: approach used for the implementation of the ICG System

The methodological approach used for the implementation of the ICG represents a mix between different Commission services' methodologies and practices for conceptualisation, quality assurance, development and deployment. In this context, the regular internal meetings and demonstration sessions allow for discussing and implementing real functionalities, avoiding too elaborate mock-up screens. The adaptive planning allows for responding faster to expectations and changes in a flexible way.

To ensure effective feedback from future users and the successful implementation of the system, Member States will be invited to participate on a voluntary basis as soon as a test version is available. This collaborative approach aims to:

Engage stakeholders early: gathering diverse perspectives and insights that will be valuable for refining the system. At the same time, an extensive demo was organised for the art market, specifically tailored for them, highlighting the main workflows, while gathering relevant feedback.

Foster collaboration: contributing to a more robust and user-friendly system.

Early familiarisation: Member States will have the opportunity to become familiar with the system early in the development process, helping them understand its functionalities and benefits before the date of the full deployment.

High-level planning

The ICG features are classified under different categories as presented below:

- (a) "ICG core features with existing base in TRACES": essential features where existing functionality will be reused;
- (b) "ICG core features without existing base in TRACES": essential features to be built from scratch;
- (c) "ICG not core features": important but not essential features;
- (d) "External connections": features that rely on external inputs;
- (e) "Out of scope": features not for the first ICG system version (e.g. Artificial Intelligence);

High level overview of availability targets												
Category	2022				2023				2024			
	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4
A – Core, reuse TRACES												
B – Core, new development												
C – Not core features												
D – External connections												

Table 1: High-level overview of availability targets

Request for Changes (RfCs)

As per the Change Management Process, whenever a change is identified, this is registered in a Request for Change (RfC) list. While the development activities are progressing and internal discussions are ongoing, several changes are identified to be implemented at the Level 2-Level 4 ICG BPMs. Therefore, the BPMs and BAC document are updated to reflect the latest status considering the amendments. The Member States are informed about the changes, however so far the modifications do not have any impact on them. As part of the external review process, during the second quarter of 2024, Member States were asked to conduct a formal review of all changes implemented up to that point and provide feedback or comments as necessary. Member States approved the changes, having been informed in a timely manner about the modifications, thanks to the close cooperation established through various forums.

External synergies

During the reporting period, the Commission has been liaising closely with international organisations, such as UNESCO and ICOM in the context of populating the ICG Library with quality third country law profiles, in particular for Red List countries¹⁰).

Internal Cooperation

An extensive cooperation exists between the Commission's services responsible for customs and for health, who are responsible for a number of policies that are deeply intertwined. The operational framework of cooperation has been agreed between services and has been further enhanced during the reporting period through continuous monitoring.

Work with the Project Group on 'Digitalisation of Cultural Goods'

The Commission has created a Customs Project Group on the Digitalisation of Cultural Goods¹¹ which serves as a discussion forum for experts from Member States national customs administrations and competent (cultural) authorities with experience in carrying out licencing formalities in heritage matters, in particular digitally. The Group provided support in the preparation of the implementing act, and is assisting the Commission services with defining the parameters and elaborating the criteria for the functional specifications of the ICG system.

The Project Group¹² currently consists of delegates from 15 Member States (AT, BE, BG, DK, DE, EE, EL, ES, FR, HU, IT, LV, NL, PT and RO) and to-date it has met four times (during the reporting period 29 June 2023 – 28 June 2024).

During this reporting period, the Project Group mainly examined and provided their expertise and insight on the following subjects:

- Four demonstrations of the ICG system were conducted; during the last one (June 2024) Member States had the opportunity to test the ICG system in a training environment, and they were also informed about the pre-registration of operators (in order to avoid a large influx of registration requests just before the date when the system is expected to go live).

¹⁰ <https://icom.museum/en/resources/red-lists/>

¹¹ The Project Group on Digitalisation of Cultural Goods serves as a discussion platform, where experts from national customs administrations and competent (cultural) authorities with experience in carrying out licencing formalities in heritage matters, in particular digitally, come together to provide support with the activities related to the development of the ICG System.

¹² For more details on the Project Group's mandate and work, please see the Commission's first Progress Report [COM\(2020\) 342 final](#).

- Establish the functionality of the ICG system supporting the temporary import of cultural goods in exemption from licencing requirements in the context of commercial art fairs, including a mechanism for follow up controls of the exempted imports by the competent authorities and an alert mechanism in case the terms of the exemption were infringed.
- Define the template for the third countries law compendium, to help the ICG users identify the export laws in third countries.
- Finalise the Administrative Cooperation module, allowing Member States competent authorities to exchange information on documents managed in the ICG.
- Cooperation with the Member States regarding the services or departments they have designated as competent authorities in their territory (for inclusion in the ICG).
- Progress on the training materials for the ICG system, including the ICG user manual, to ensure users will be fully equipped with the necessary knowledge and skills to efficiently operate the system.
- Incorporation of the feedback from Member States with regards to concrete workflows such as : Split workflow, Partial rejection workflow, e-Seal, issuance of an importer statement for the purpose of a commercial art fair and the related period of time for the temporary admission, etc.
- Cooperation on the future translation activities for the ICG system, making it available in all EU languages, ensuring inclusivity and accessibility for all users.
- Member States were consulted regarding the future extension of the ICG to include the export domain¹³, ensuring an equal protection for European as well as for world cultural heritage. Some examples of consultation with the Member States on the export topic include : practice to issue open licences, the existence of digital solution to handle the export certificates in the area of cultural goods, workflows at national level, etc.

Additionally, during the reporting period and as new functionalities were created and added to the system, the ICG developers team made a demonstration to the Expert Group on customs issues related to cultural goods¹⁴ and to the Expert Group ‘Dialogue with the Art Market’¹⁵ to get feedback on the implementation of the new features. Three demonstrations were performed in the context of the Project Group of Digitilisation of Cultural Goods, and a fourth with the Customs Business Group (CBG), given the importance to familiarise all the Member States with the ICG testing environment and not only the Project Group members.

5. RISKS FOR DELAYS

Risk 1 – Staff allocation

The initial proposal from the Commission did not provide for the creation of an IT system. Thus, resources were not allocated accordingly. However, in the course of the negotiations and at the request of the co-legislators, the creation of the ICG system was included in the Regulation, which called for additional resources, unforeseen at that point. The needs for this six-year project in terms of IT development personnel were estimated, at the time of the final political trilogues in December 2018, to be two full time Administrator posts. To partly mitigate this risk, an internal PQTM consultant was assigned from Q4 2023 to support the

¹³ Council Regulation (EC) 116/2009 on the export of cultural goods.

¹⁴ A Commission group composed by representatives of Member States customs and cultural authorities.

¹⁵ A Commission group composed by representatives of art market associations, academia, international organisations and other stakeholders.

Administrator in charge. This is intended to provide additional support, given that both the AD and the PQTM consultant work only partially on the ICG project.

Despite the constraints, the Commission is committed to delivering the project within the stipulated timeframe, ensuring compliance with the regulatory requirements. The legal framework mandates that the system must be continuously maintained and operated once established. Therefore, ongoing resource allocation is essential for proper aftercare. Discontinuing support would negatively affect compliance with the legal requirements.

Sustaining a dedicated team will provide essential continuity, leveraging expertise for both immediate support and future enhancements, thereby ensuring long-term reliability and adaptability for the overall cultural goods domain, including import and, in the future, export.

Mitigation actions

The risk has been reported internally.

6. CONCLUSIONS

This progress report is the last one of the series as the ICG system will become operational and Regulation (EU) 2019/880 fully applicable on 28 June 2025.

The main actions to develop the ICG system that were undertaken during the period covered by the present 5th progress report can be summarised as follows:

- The reporting period saw significant advancements in the development of the ICG system and its integration with the EU CSW-CERTEX. Collaboration with Member States remained a priority, involving early participation for familiarisation with the ICG system and feedback, which played a crucial role in refining its functionalities. Four live demonstrations were conducted, allowing Member States to be actively involved in the process and provide valuable insights and feedback, which led to iterative improvements and enhanced usability.
- Several ICG functional concepts were agreed and completed, in close cooperation with the Member States, to ensure the readiness of the system within the legal deadline.
- A strong focus was placed on testing to identify potential issues and improve the user experience, reducing the likelihood of critical problems post-deployment.
- Additionally, progress was made on developing third country profiles for the ICG law compendium (the Library), with extensive efforts to refine the template to accurately capture export legal provisions and other key details for the targeted countries.
- The period also emphasised the development of comprehensive training materials, including a user manual, to ensure end-users are well-equipped. Two training modules are planned: one for competent authorities and importers, and another for customs.
- Planning the translations for the ICG system in close cooperation with the Member States, to ensure the relevant linguistic skills and cultural knowledge necessary to accurately translate technical terms.
- Integration with the EU CSW-CERTEX system remained a key priority in order to ensure that customs will have all the necessary access to information for control purposes within the legal deadline. Ongoing efforts are made to enhance system reliability and user satisfaction through rigorous testing, focusing on identifying and addressing potential issues pre-deployment.

- Finalisation of the mechanism for the Administrative Cooperation, enabling Member States' competent authorities to exchange information on documents managed within the ICG system.

ANNEX I: MULTIANNUAL STRATEGIC PLANNING

The MASP-C ensures an effective and coherent management of IT projects by setting out both a strategic framework and milestones within the legal deadlines established in legislation. It is ultimately endorsed by the Member States in the Customs Policy Group (CPG) based on advice provided by the Electronic Customs Coordination Group (ECCG) and consultations with trade at the Trade Contact Group (TCG).

The planning for the electronic system has been discussed and approved by the Member States and is described in detail in Fiche 1.18 of the MASP-C rev. 2023.

Table 1 below provides an excerpt of the planning of the project on the import of cultural goods from MASP-C rev. 2023 Fiche 1.18.

<i>Table 1 - Excerpt of MASP-C rev. 2023 Fiche 1.18</i>		
	<i>Milestones</i>	<i>Estimated completion date</i>
1	Business Analysis and Business Modelling	
	- Business Case Document	Q4 2020
	- Level 3 (User Requirements BPM)	Q3 2021
	- Level 4 (Functional Requirement detailed BPM)	Q3 2021
2	Legal Provisions	
	- Current provisions adopted*	Q2 2019
	- Future provisions adopted**	Q2 2021
3	Project Initiation Phase	
	- Vision Document	Q2 2021
	- GO decision	Q2 2021
4	IT Project	
	- Application & Service Specifications	Q2 2023
	- Technical System Specifications	Q2 2023
	Construction Phase	
	- Central services implementation	Q3 2024
	- Service integration in National Systems	N/A
	- National implementation	N/A
	Transition Phase	
	- Deploy and rollout	Q4 2024
	- Conformance tests	Q2 2025
5	Operation	
	- Commission, Member States administrations and Traders	Q2 2025
	- Non-EU Countries and non-EU traders (in case required)	N/A
6	Implementation support (training and communication)	
	- Centrally developed training and communication	Q4 2024
	- National training and communication	Q4 2024

*Current provisions refer to Regulation (EU) 2019/880

**Future provisions refer to the implementing provisions to be adopted according to Regulation (EU) 2019/880

Table 2 provides an excerpt of the EU CSW-CERTEX project, with a focus on Component 2 of the EU-CSW CERTEX project, interconnecting the ICG system.

<i>Table 2 - Excerpt of MASP-C rev. 2023 Fiche 1.13 – Component 2 “EU CSW- CERTEX”</i>		
	<i>Milestones</i>	<i>Estimated completion date</i>
1	Business Analysis and Business Modelling	
	- Business Case Document	Q1 2017
	- Business Case Annex	Q4 2023
	- Level 3 (User Requirements BPM)	Q1 2024
	- Level 4 (Functional Requirement detailed BPM)	Q1 2024
2	Legal Provisions	
	- Current provisions adopted*	In force
	- Future provisions adopted**	2022
3	Project Initiation Phase	
	- Vision Document	Q3 2017
	- Project Charter ¹⁶	Q4 2023
	- GO decision	Q4 2023
4	IT Project	
	- Application & Service Specifications	Q2 2024
	- Technical System Specifications	Q2 2024
	Construction Phase	
	- Central services implementation	Q3 2024
	- Service integration in National Systems	From Q4 2024 onwards
	- National implementation	From Q4 2024 onwards
	Transition Phase	
	- Deploy and rollout	Q4 2024
	- Conformance tests	From Q4 2024 onwards
5	Operation	
	- Commission, Member States administrations and Traders (NB: This is the Operations date for the Commission, MS will conformance test from Q2 2020)	Q1 2025
	- Non-EU Countries and non-EU traders (in case required)	N/A
6	Implementation support (training and communication)	
	- Centrally developed training and communication	N/A
	- National training and communication	N/A

*Current provisions refer to Regulation (EU) 2019/880

**Future provisions refer to the implementing provisions to be adopted according to Regulation (EU) 2019/880

¹⁶ To replace the Vision Document as per the alignment with the Commission PM2/Agile methodology.

ANNEX II: MAIN PROJECT PHASES AND CRITICAL MILESTONES TIMELINE

