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Study supporting the evaluation of Regulation 608/2013 on customs enforcement of IPRs - Targeted consultation

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Study supporting the evaluation of Regulation 608/2013 on customs enforcement of IPRs - Targeted consultation



NTT DATA, in consortium with Ecorys, is conducting a “*Study supporting the evaluation of Commission Regulation 608/2013 on customs enforcement of Intellectual Property Rights*” on behalf of the European Commission’s Directorate-General for Taxation and Customs Union (DG TAXUD).

Overall, the study is aimed at assisting the European Commission in evaluating Regulation 608/2013 by:

- **Collecting information to assess the implementation and functioning of the Regulation** and whether its legislative and IT framework remain fit-for-purpose. The study will assess how existing procedures, data management systems, and IT tools (such as central and national COPIS, national portals, the COPIS/IPEP interface for eAFAs) support customs authorities in identifying and controlling IPR risks efficiently.
- **Evaluating the Regulation across core criteria:** effectiveness, efficiency, relevance, coherence, and EU added value from 2014 to 2023, as well as updating the implementation status since the 2017 report to the European Parliament and the Council on the implementation of the Regulation.
- **Providing the European Commission with inputs to support the evaluation of the Regulation**, as well as the second report to the European Parliament and the Council on the implementation of the Regulation.

As part of the study, this EU-wide survey has been launched with the aim of:

- **Gathering views and experiences** from a range of stakeholders on how the Regulation is being implemented and functioning in practice.
- **Collecting evidence** on strengths, challenges, and potential areas for improvement, particularly in relation to procedures, tools, and cooperation mechanisms at both EU and national levels.

The survey is addressed to a **range of stakeholders** involved in or impacted by the implementation of the Regulation, including EU institutions, bodies and agencies, Member State customs authorities, other national authorities involved in IPR enforcement, right-holders, business associations, logistics actors, and consumer organisations.

This survey takes **around 10/15 minutes** to complete and is available in **English**. The survey questions consist of a combination of single choice, multiple choice and open-text questions.

The survey can be completed **over more than one session**, by clicking on **“Save as draft”** (top right of screen) and storing the link provided; however, you are encouraged to complete it in a single session, if possible. If you need to consult with others to complete the survey, you can **download a PDF** by clicking **“Save as draft”** (top right of screen) and following the instructions on the next screen.

The survey will be **open until the 20th of June 2025**. Thank you in advance for taking the time to complete this questionnaire, your support is very much appreciated.

Should you have any questions, please do not hesitate to contact us at study.ipr.evaluation@nttdata.com (<mailto:study.ipr.evaluation@nttdata.com>).

Your personal data shall be processed in compliance with the EU General Data Protection Regulation no. 679/2016 ("GDPR") and Regulation 2018/1725 setting the rules applicable to the processing of personal data by European Union institutions. For more information regarding the data collected and how it will be processed, please refer to the attached Privacy Statement.

Privacy_statement_Study_Reg_608_2013.pdf

Introduction

*Please indicate the name of the institution or organisation you represent:

APRAM - Association des Praticiens du Droit des Marques et des Modèles

*Please indicate your role within the institution/organisation you represent:

Secretary General

*Which stakeholder category do you represent?

- ☐ European institutions, bodies and agencies
- ☐ Member States customs authorities
- ☐ Other MS IPR infringement authorities
- ☐ Right-holders (businesses)
- ☒ Business associations
- ☐ Logistic actors
- ☐ Consumer associations

*Please indicate the country where your institution/the headquarter of your organisation is based.

France

Questionnaire for Business associations

The following sections will ask you to reflect on the implementation, effectiveness, efficiency, relevance, coherence and/or EU added value of Regulation 608/2013 on the enforcement of IPR at EU borders.

Implementation of Regulation No 608/2013

*Do you believe there is a need for training/guidance for right-holders and businesses on intellectual property rights and IP substantive law?

- ☒ Yes
☐ No
☐ I do not know

Effectiveness of Regulation No 608/2013

In your view, to what extent has the Regulation contributed to:

| | Not at all | To a limited extent | To some extent | To a significant extent | I do not know |
|--|-----------------------|----------------------------------|----------------------------------|-------------------------|-----------------------|
| *Protecting intellectual property at the EU external borders | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| *Reducing the number of infringing goods entering the EU | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| *Detecting and detaining goods suspected of infringing an IPR which may also endanger health and safety of consumers | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |

*What is your level of satisfaction with the effectiveness of IPR enforcement mechanisms under the Regulation?

- ☐ Very low
☐ Low
☒ Moderate
☐ High
☐ Very high
☐ I do not know

In your opinion, what are the main issues that hinder the effectiveness of the Regulation's IPR enforcement mechanisms?

The mechanisms are not immediate in their functioning and not simple to use/user-friendly.

The lack of harmonised rules and laws across Member States is also an important obstacle for the Regulation's IPR enforcement mechanisms. In some countries, the implementation of the Regulation by Customs can also be too strict, making it difficult for right-holders to use the enforcement mechanisms.

The explosion in e-commerce also added complexity, as rightly highlighted in the Commission's February 2025 Communication (A comprehensive EU toolbox for safe and sustainable e-commerce). Counterfeit goods are easily offered and sold online, and then delivered via platforms, social media, live messaging apps and other online intermediaries.

The effectiveness of the Regulation's IPR enforcement mechanisms is also seriously hindered because all the intermediaries involved in the relevant logistics supply chains do not share relevant pre-arrival data with customs, which would allow for better targeting and thus better controlling by customs—especially since the increase in small postal and courier shipments of counterfeit goods poses a significant challenge for enforcement. Due to the mismatch between volume, priorities and customs resources, we are concerned that the current mechanism is insufficient to adequately address the growth of e-commerce.

The lack of information sharing by the relevant actors also makes it difficult to identify who is liable/responsible of the infringement. It would also help to have more visibility on Customs' knowledge and training when rights-holders file applications for customs' actions, in order for the rights-holders to help customs in identifying illicit goods and in filling the gaps in terms of knowledge and training on the goods protected by IPR.

Costs related to notification management can be high for some right-holders and often disproportionate as to the number of goods seized, with very short deadlines for response, which are difficult to handle for small businesses without dedicated anti-counterfeiting teams.

We also noted the lack of clear guidelines on when and how customs authorities can intervene when goods transit through the EU on their way to a final destination outside the EU. This ambiguity creates legal uncertainty for businesses and right holders.

Also of note, EU Regulation 608/2013 provides that, to avoid the release of the goods, the IPR holder has to initiate "proceedings to determine whether an intellectual property right has been infringed" within the 10 day deadline (Article 23.5).

Therefore, according to EU Regulation 608/2013 (and contrary to the customs retention based on the French Intellectual Property Code) :

- it is not possible to perform probatory measures (like the « saisie-contrefaçon » of the French Law) as it is not a procedure "to determine whether an intellectual property right has been infringed";
- It is not possible to file a complaint before the Public Prosecutor (as, under French Law, a complaint is not a "proceeding" ; i.e, a complaint is deemed as a simple information provided to the Public Prosecutor, it does not submit the case to a Court).

In addition, it is unclear under French Law whether a « référé » proceeding (provisional enforcement measure) would be a "proceedings to determine whether

an intellectual property right has been infringed”.

This requirement represents a significant difficulty for IPR owner :

- The 10 days deadline is very short for drafting a writ of summons (in particular for cases involving technical issues, as patents). In some cases, it is not possible to draft a writ of summons in such a timeframe ;
- The 10 days deadline is also very short when it is necessary to serve the writ of summons abroad (in such a case, it is often necessary to translate the writ of summons).
- In some cases, it is not possible to serve a writ of summons because the information provided by Customs (and reproduced in the customs documents) are incomplete or false. For example, if the name and the address of the receiver of the goods is false, the IPR owner cannot serve a writ of summons.

For these reasons, it seems necessary to amend the EU Regulation in order to notably allow the IPR owner to perform probatory measures (like a « saisie-contrefaçon ») or to file a complaint within the 10 day deadline (as it is the case for customs retentions based on the French Intellectual Property Code).

In your view, to what extent is the Regulation effective in responding to the risks associated with devices circumventing IP protection measures?

**[IPR circumventing devices and techniques are tools, products and methods used to bypass or disable intellectual property protections in order to access, copy, use or sell goods without the right-holder's permission]*

- ☐ Not at all
- ☒ To a limited extent
- ☐ To some extent
- ☐ To a significant extent
- ☐ I do not know

In your experience, what hinders the Regulation's effectiveness to respond to the risks posed by circumventing devices and/or techniques?

Infringers are becoming increasingly creative and use ever more sophisticated IPR-circumventing techniques, making detection extremely difficult without specialized knowledge or technical tools (e.g. reproduction of fake QR codes redirecting to right-holder's website, products sent with fake cash receipts found to be sold on European marketplaces). New counterfeit production technologies are difficult to identify, mostly due to the lack of training.

Effectiveness of the Regulation is also hindered by the regulation's lack of flexibility: it is important to be open to the needs of the stakeholders when implementing the regulation, as public authorities may not be as aware of new techniques used by counterfeiters as right-holders are.

To your knowledge, to what extent has the Regulation achieved the following objectives regarding IPR enforcement needs?

| | Not at all | To a limited extent | To some extent | To a significant extent | I do not know |
|--|------------|---------------------|----------------|-------------------------|---------------|
| | | | | | |

| | | | | | |
|--|-----------------------|-----------------------|----------------------------------|-----------------------|----------------------------------|
| * To strengthen and further harmonise IPR protection by EU customs | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| * To provide simplified procedures and appropriate training for customs officials | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| * To centralise data in a central database (for AFA and detention data) and ensure interoperability between national system (if existing) and the central system | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| * To foster data collection, sharing and coordination between stakeholders | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| * To facilitate the sharing of information and data with relevant authorities in third countries | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> |

In your opinion, for what reasons have the objectives not been achieved?

Huge differences remain in the EU between the various Member States and their equally various national Customs law impacting the implementation of the Regulation : many customs rules and procedures remain national, with little harmonisation across the EU, creating uncertainty and different systems in the end (for management of AFAs, fiction of consent to destruction in the simplified procedure, provision of samples and pictures, mandated use of different forms and file formats and differing procedures and fees for storage and destruction, IPR infringement is not punished by national Customs law in all Member States, lack of clarity of certain provisions).

An example of the inconsistencies between the EU and national laws is the extension of the 10-day deadline. Article 23 explicitly provides for an extension only when there is an objection to the destruction of goods. However, in several Member States it is possible to request an extension after the infringing character of the goods is confirmed for the purpose of initiating legal action within the detention period, with the extension being automatically granted. This practical possibility should be included in the Regulation, and consideration also given to extensions to permit right holder expertise and authentication, e.g. when the holder of the decision needs to receive samples, conduct in-depth expertise, when there are multiple products thus multiple experts involved, when coordination of multiple parties is needed (lawyers, local brand protection teams, experts etc.) and when additional images are required. There can also be confusion as to when the 10 days start: is this working or calendar days?

Overall, we do not know what access customs officers have to any central database, containing information submitted by other agencies and/or right holders. IPEP has great potential but to date that potential is not realized. Based on our experience, public authorities and agents on the field do not really consult the IPEP Database. The Regulation is also not clear enough to permit secure communication of the data without potential violation of data protection laws, notably through IPEP. Too often the GDPR is used as an unjustified excuse for not sharing data and clear official guidelines of what can be shared under the GDPR are needed, especially as we are dealing with suspected infringements.

The Regulation has the potential to work well for trade marks (if the national law and procedures are also effective and coherent) but the Regulation is less understood and applied for other IPRs, such as designs.

***Which external factor(s) do you believe have the greatest impact on the achievement of the Regulation's objectives?**

- ☒ Global trade and supply chains
- ☒ Technological advancements
- ☐ International cooperation
- ☒ Changes in the modus operandi of the infringers
- ☐ Changes in trade policies and agreements
- ☒ Exponential increase of e-commerce
- ☐ Consumer demand
- ☒ Other, please specify
- ☐ I do not know

***If you selected "Other", please specify:**

There is a blatant lack of resources of public authorities and discrepancies between customs' resources and priorities, and the different national laws and procedures, in the IPR field. While it is not our place to comment on customs resources, we believe that a focus should be put on the efficiency of the use and exchange of data in general and pre-arrival data.

As counterfeiters take advantage of loopholes, it would help to have common practices at the ports of entry in the EU and to give customs officers enough time to properly inspect ships - instead of always compete to have the best "speed of handling".

*In your opinion, to what extent has the expanded scope to include additional rights (i.e. trade names, topographies of semiconductor products, and utility models) and types of infringements (i.e. trademark infringements, infringements via circumvention devices) enhanced the protection of IPRs at EU borders?

- ☐ Not at all
- ☐ To a limited extent
- ☒ To some extent
- ☐ To a significant extent
- ☐ I do not know

Efficiency of Regulation No 608/2013

*In your opinion, how efficient is the process of preparing and submitting an AFA for right-holders?

- ☐ Not efficient at all
- ☒ Somewhat efficient
- ☐ Very efficient
- ☐ I do not know

Please justify your answer

The process of preparing and submitting an AFA has been simplified and centralized but it remains time-consuming and overly repetitive. Right-holders are required to enter the same or similar product descriptions and supporting documents. For a major IPR owner there can be added difficulty of gathering relevant data from a complex structure while for an SME without a dedicated legal/IP department it may be simply impossible.

Difficulties also remain regarding practicalities relating to the inscription procedure with the IPEP Platform: indeed, a letter with a safety code is sent by postal service to the rights holder, to the registered address in the trade mark register. The procedure is not relevant for huge companies, notably when they have different counsels for different countries.

We would appreciate improvements such as faster notifications and acceptance of the registration. It is also challenging for those based outside the EU, especially for an ex officio action where the AFA should be filed within 4 days after the notification of the suspension of release of the goods.

Renewals can be even more complicated. Prior to the eAFA, a right holder simply completed and submitted a form to customs, attaching the updated Annex (if any). In addition, national AFAs must still be renewed separately, creating a double process - one for national AFAs and one for EU AFAs with IPEP.

In your opinion, how efficient are the following procedures of the Regulation for right-holders?

| | Not efficient at all | Somewhat efficient | Very efficient | I do not know |
|-------------------------------|-----------------------|----------------------------------|-----------------------|-----------------------|
| * Standard procedure | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| * Small consignment procedure | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| * Ex-officio | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> |

Please justify your answer

The customs have important powers and they are very efficient. Efficiency of customs enforcement of IPRs for right-holders improved. The AFA system, detention procedures, and information exchange mechanisms have proven to be working more efficiently to fight against illicit trade.

But the standard procedure is often not efficient due to the high administrative and legal costs it imposes, especially for smaller brands. These costs can outweigh the benefits of enforcement, particularly given the volume of infringements.

The small consignment procedure can be efficient for the destruction of small quantities of infringing goods, but it is not applied in all Member States, and where it is, it is applied very differently. The associated costs that right holders need to cover render it unattractive as budgets cannot be extended. The main problem, however, is the lack of information given to right holders or even recorded by customs under this procedure, creating a major loophole for repeat offenders to exploit, without being identified and tracked.

Regarding ex officio cases, timelines are too short and make it hard to use.

In your opinion, to what extent are the costs of storage and destruction of infringing goods sustainable for:

| | Not sustainable at all | Somewhat sustainable | Very sustainable | I do not know |
|----------------------------|----------------------------------|-----------------------|-----------------------|-----------------------|
| * Right-holders in general | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| * SMEs | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |

Please justify your answer:

A reminder seems essential here : right holders do not engage in the manufacturing, sale or distribution of counterfeit/infringing products. Right-holders are the victim while they are being liable for the costs of storing detained goods, even if the goods are ultimately found to be infringing, and for the costs of destruction - costs that are high and most of the time disproportionate with the number of goods seized.

This mechanism has no deterrent effect and is only beneficial to illicit traders, that can move illegal goods as they wish in and out of the EU knowing that they will not have to pay should customs act.

Right holders have no choice in the storage, transport or destruction providers appointed by customs, who are usually private commercial companies, with their own, frequently non-transparent, fees. These companies charge different amounts and invoice at different times, creating unpredictability. Due to the long lead times (customs processing, court proceeding,) in many cases, goods are held for months, or even years, which significantly increases costs to be borne.

Article 29 of the Regulation also conflicts with Article 76 of the Union Customs Code, that states: "The costs of the destruction shall be borne by the importer or the exporter". The Regulation refers to the "holder of the goods", which can differ from the importer/exporter. To ensure a harmonised approach with the UCC, both should clarify that "The costs of the destruction shall be borne by the importer, exporter or holder of the goods".

Stakeholders that are responsible for the import of illegal goods into the EU should be liable for these costs and have an identified point of contact for customs' matters.

Relevance of Regulation No 608/2013

*In your view, to what extent is EU-level action still needed to tackle the IPR enforcement needs and problems addressed by the Regulation?

- ☐ Not at all
- ☐ To a limited extent
- ☐ To some extent
- ☒ To a significant extent
- ☐ I do not know

*In what areas do you consider EU-level action is still needed?

- ☐ Legislative matters
- ☒ Implementation facilitation
- ☒ Procedure simplification
- ☒ Annual reporting
- ☒ Cooperation with right-holders
- ☒ Communication and information-sharing
- ☐ IT infrastructure
- ☒ Other, please specify
- ☐ I do not know

*If you selected "Other", please specify

EU-level action is needed on all of the above subjects. While much is in place already, development or evolution is essential to be fully effective (e.g. clarity on procedures, deadlines, etc) and accountability of rogue traders and involved intermediaries is crucial.

Clarity is also needed regarding EU customs authorities' powers regarding the enforcement of IPRs on goods that are not intended for the EU market.

In your view, to what extent are the Regulation mechanisms appropriate to respond/adapt to:

| | Not at all | To a limited extent | To some extent | To a significant extent | I do not know |
|--|-----------------------|----------------------------------|-----------------------|-------------------------|-----------------------|
| *The exponential quantitative growth of e-commerce | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| *New technological developments (e.g. AI models, blockchain, image recognition, digital tracking systems, data analytics for predictive risk analysis) | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |

*In your view, why is the small consignment procedure (SCP) relevant for customs IPR enforcement purposes?

- ☒ Faster and more efficient destruction of IPR-infringing goods
- ☒ Reduced storage and handling costs
- ☒ Better adaptation to e-commerce challenges
- ☒ Reduced burden for declarants and holders of goods
- ☒ Streamlined customs operations
- ☐ I do not believe it is relevant
- ☒ Other, please specify
- ☐ I do not know

*If you selected "Other", please specify

To increase its use, national practices should be harmonised, costs should be reduced and more data given to right holders.

Coherence of Regulation 608/2013

*To your knowledge, are the Regulation's provisions coherent with one another?

- ☐ Not at all
- ☒ They are partially coherent with one another
- ☐ They are fully coherent with one another
- ☐ Other, please specify
- ☐ I do not know

What are the main incoherences you have identified within the Regulation?

Balancing free trade with IPR protection remains a challenge. The main incoherence we can highlight remain the various implementations of the Regulation by the Member States. Beyond that, cooperation between customs and right-holders can face difficulties, insufficient exchange of information among the relevant authorities, and different communication channels with the right-holders also creates inconsistencies.

Certain provisions lack clarity:

- The Regulation expands the scope of IPRs but excludes parallel imports.
- For example, Article 2(5) provides that counterfeit goods are "goods which are the subject of an act infringing a trade mark in the Member State where they are found and bear without authorisation a sign which is identical to the trade mark validly registered in respect of the same type of goods, or which cannot be distinguished in its essential aspects from such a trade mark." This is ambiguous: a clarification could be to amend it to read "a sign that creates a likelihood of confusion."
- The wording of the French translation of Article 2.7 of the EU Regulation is unclear regarding the scope of the customs retentions.

Article 2.7 a) defines the «goods suspected of infringing an intellectual property right » (under which a customs retention may be performed) as « des marchandises qui font l'objet d'une action portant atteinte à un droit de propriété intellectuelle dans cet État membre. »

The word « action » is confusing because it means generally, in French, « legal action ».

We see that the English version of this Article 2.7 a) mentions « goods which are subject of an act infringing an intellectual property right in that Member State »

To clarify and to avoid any misunderstanding, we suggest to rewrite Article 2.7 a) and to mention « des marchandises qui font l'objet de tout acte portant atteinte à un droit de propriété intellectuelle dans cet État membre. »

*In your opinion, to what extent is the Regulation able to adapt to new technological developments and tools to better access information on goods entering the EU (e.g. Digital Product Passport)?

- ☐ Not at all
- ☒ To a limited extent
- ☐ To some extent
- ☐ To a significant extent
- ☐ I do not know

What are the main gaps you have identified so far regarding the Regulation's capacity to adapt to new technologies and tools to better access information on goods entering the EU?

The main gap we have identified relates to the resources of EU customs agencies, as no specific provision is contemplated and no practical solutions are offered regarding the adaptation to new technologies and tools.

Development of tools could be useful to monitor repeat infringers, new trends and techniques used by counterfeiters, and facilitate rapid exchanges of information, in order to close some of the gaps below :

- No general use of technical solutions across the Member States to scan and identify suspicious parcels.
- Communication of data: it would help to communicate any information related to parcels/shipments (container numbers, invoices, products and parties, etc) to right holders as these information are of great importance in infringement/counterfeit cases, and to also share these information between all Member States to effectively manage enforcement, investigation and data intelligence.

Do you consider the data protection provisions in the Regulation (Art. 33) still fit for purpose (especially, taking into consideration personal data included in AFAs or detention data)?

**[Main references to data protection within the Regulation: Regulation 45/2001, Supervision of European Data protection Supervisor, Directive 95/46/EC, Regulation 45/2001, Directive 95/46/EC]*

- ☐ Yes
- ☒ No
- ☐ Other, please specify
- ☐ I do not know

Please justify your answer

Article 33 relies on outdated references. In light of GDPR, clarification is needed on data sharing.

Relevant data and information are essential to both right holders and law enforcement to effectively tackle the growth of counterfeit goods entering the EU. Action is needed to prevent the use of falsified data in shipping and customs documentation.

Clear official guidance is needed for the processing and sharing of data for IP enforcement purposes. This uncertainty creates multiple issues with data sharing, including the inability to share data that customs obtained in the course of a seizure via IPEP. The GDPR does not apply to legal persons' data, and no privacy law is supposed to protect illegal traders.

EU added value of Regulation No 608/2013

*In your opinion, to what extent does information exchange between COPIS and IPEP contribute to IPR customs enforcement within the EU?

- ☐ Not at all
- ☒ To a limited extent
- ☐ To some extent
- ☐ To a significant extent
- ☐ I do not know

Please justify your answer

Generally speaking, greater information sharing is needed between all EU customs.

IPEP facilitates the exchange of information between customs authorities and right-holders but the system is not flexible enough.

Many core functionalities in IPEP still do not work, and most authorities and law officers do not use it at all as it is only accessible by restricted/limited personnel at certain ports of entry. IPEP undergoes many technical issues that hamper its use/relevance and affect its interoperability with other systems.

We do not have visibility into COPIS.

Final questions

*As part of this study, we may conduct further consultations, if necessary, to gather more in-depth insights.

Would you agree to be contacted for a follow-up discussion?

- ☒ Yes
☐ No

Please provide your contact details below:

| | Information |
|-----------------|------------------------------------|
| * Full name | Claire-Line Lallemand |
| * Email address | claireline.lallemand.ext@apram.com |

Which of the following topics would you be interested to contribute to?

- ☐ Use of the small consignment procedure: Exploring barriers to adoption
☒ Notifications and information exchange between right-holders and customs authorities
☒ IP rights in the scope of the Regulation: why are certain IP rights not enforced?

Contact

Contact Form (/eusurvey/runner/contactform/IPR_study_evaluation)
