



**Commissioner Thierry Breton
Directorate General for Internal Market
European Commission
Rue de la Loi 200
1049 Brussels
Belgium**

Paris, 11 September 2020

Re: Distance sales of alcoholic beverages and European Commission final report concerning the general arrangements for excise duty

Mr Commissioner,

The European Confederation of Independent Winegrowers (CEVI) represents and defends the interests of the European independent Winegrowers, which are at the head of family businesses, grow their own vine and produce themselves their wine. They directly sell the fruits of their labour to the consumers, and actively contribute to the development of the entrepreneurial fabric of the internal market.

The crisis we have been facing for the last months due to the COVID-19 pandemic has led to a necessary physical distancing as well as the closing of hotels, bars and restaurants in Europe, heavily impacting our sector, which is depending on these convenience stores to sell its products. To some extent, direct selling to consumers and via e-commerce has benefitted to several winegrowers and reduced income losses.

With this in mind, CEVI would like to remind the difficulties the Independent Winegrowers have been facing for many years when it comes to distance sales of excise goods from one EU country to another, and when the vendor is subject to excise duty in the EU country of destination. These direct sales to consumers are significant source of incomes for our SMEs yet forced to abandon exports of small volumes of their products to EU individuals, because of the disproportionate costs and administrative burdens. Their removal would undoubtedly open new prospects, contributing to the recovery of our businesses and local economies.

CEVI – European Confederation of Independent Winegrowers

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In June, the European Commission published a final report assessing articles 32 and 36 of Council Directive 2008/118/EC concerning the general arrangements for excise duty. This study stresses that Independent Winegrowers face several difficulties to market their products from one Member State to another, as well as administrative burdens and a lack of information with regard the different national systems in place, making this marketing impossible.

CEVI welcomes these observations that have been going on for some time: trade barriers on our products in the internal market have been criticised since 2015 by our Confederation, which has actively been participating to identify inconsistencies of the current system that are pointed out by the study.

Mister Commissioner, in your mission letter given by President Ursula von der Leyen in the very beginning of your mandate, the missions that have been assigned to you include, amongst others, «*to guarantee the smooth functioning of the single market*» and «*look at the remaining barriers relating to goods and services*» by «*help remove any artificial distinctions between new digital markets and more established markets*».

Therefore, we would like to reiterate, through you, our request to the European Commission to rapidly act by coherently reshaping articles 32 and 36 of the 2008/118/EC Directive, as well as by taking into consideration all our remarks that have been shared by CEVI with EU authorities for a long time, and that have also been identified in the final report published in June. Hence, in coordination with Directorate General for Taxation and Customs Union, we ask you to:

- Quickly build a « One-Stop-Shop » (OSS) for the payment of excise duty for alcoholic beverages;
- Create a web page on the European Commission's website identifying the different procedures in place in Member State, as well as giving a list of all tax representatives,
- Fix an exemption threshold at EU level for Business to Consumers distance sales under which the vendor would only be subject to excise duties in the country of residency.

Thank you in advance for considering this letter and for your answer.

Yours sincerely,



Thomas Montagne – Président
Confédération Européenne des Vignerons Indépendants

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Attachment: Study assessing articles 32 and 36 of Council Directive 2008/118/EC concerning the general arrangements for excise duty – Executive Summaries (English, French and German)

Cc: Ms Pauline Weinzierl, Member of Commissioner Breton's Cabinet, responsible for Internal Market for goods and services and for digitisation
Ms Tamara Mandras, Personal Assistant to the Commissioner
Ms Claire Saelens, Assistant of Ms Weinzierl
Mr Vicente Hurtado Roa, Head of Unit C2, indirect taxes, DG TAXUD

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