

Message exchange customer status for import

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1 Definitions of the terms

Customer using message exchange for import

Message exchange customers for import are the message declarant and the technical sender.

Message declarant for import (formerly known as EDI sender)

A Customs customer with authorisation for deferment of payment, who has Customs' authorisation to send electronic customs declarations in message format from their own data system.

Technical sender

A company that sends import declarations through direct message exchange on behalf of another representative.

Representative

A private person or a company that completes and transmits the customs declaration on behalf of the party (importer) with obligation to declare. A forwarding agency often acts as a representative.

Software supplier

A company that sells software required for import declarations. The software solutions are built based on Customs' message specifications and tested with Customs.

Direct message exchange

Message transfer over the Internet to Customs. Companies can transmit messages to Customs over the so-called web service interface and retrieve response messages generated by Customs' systems.

Operator

A company authorised by Customs to provide message transmission services required for import declarations.

Service provider

A company that on behalf of another company builds and transmits messages to Customs' direct message interface.

Certificate

Customs identifies the message builder and the intermediary with certificates granted by the Population Register Centre.

The builder needs the certificate for the ML signature and the intermediary for the connections.

Holder of authorisation for deferment of payment

A customer, who has delivered to Customs a guarantee for customs debts and obligations.

Serial number

A unique five-digit code identifying a message declarant. The serial number is needed during both testing and production and it can be seen in the unique transaction identifier of the import transaction.

Direct representative

A representative who submits customs declarations in the name of and on behalf of their principal. The principal is responsible for the customs debt and post-clearance.

Direct representative with the liability of a guarantor

A direct representative who, on behalf of the cash customer, provides a guarantee for the payment of the customs debt within the prescribed period. The principal is responsible for the customs debt and post-clearance.

Indirect representative

A representative, who submits customs declarations on behalf of a principal, but in their own name.

The representative is responsible for the customs debt and post-clearance.

Customer testing

The stage preceding the authorisation to act as a message declarant, during which the customer submits messages to the testing environment of Customs. After successful testing, the customer will receive the authorisation decision and will be able to submit error-free messages to the Customs system without problems.

Technical testing

A part of the testing of traders applying for the message declarant status. The test will be completed using either the customer's own material or material prepared by Customs, the data communication links are checked as well as the accuracy of the message structures.

Parallel testing

The second part of customer testing, which is to be conducted successfully after the technical testing.

The applicant's own import declarations will serve as parallel testing material and the testing involves checking the accuracy of the message contents.

Message exchange testing service (IAT)

An interface, which allows Customs' customers to independently test documents attached to the customs declarations.

2 Message exchange customer status for import

Message exchange customer status can be applied for by holders of a Customs authorisation for deferment of payment, who import goods from outside the **EU**, i.e. from so-called third countries.

The Customs provision No 007/2016 on electronically submitted declarations and Customs' provision 008/2016, regulate the verification of electronically submitted declarations and documents.

2.1 Message declarant

A message declarant for import is the importer of the goods or a representative. Acting as a message declarant requires an authorisation for deferment of payment (if the company has several offices, each office has to have its own).

As a direct representative, the representative can send electronically the declarations of the holder of the authorisation for deferment of payment by using the holder's guarantees. In this way the forwarding costs decrease.

More on being a representative in section 2.3

2.2 Technical sender

A company approved by Customs may act as a technical sender, i.e. they can send the import declaration messages to Customs of behalf of the representative. Acting as a technical sender, always requires an authorisation from Customs.

To the application (form 934) for message declarant status, the technical sender must provide, as an attachment, a declaration drafted by the representative stating that they are authorised by each principal to use a technical sender. A company can apply for status as technical sender if it has authorisation for message exchange for import or if it will be applying for the authorisation in question.

When using a technical sender, the following must be considered:

- The number is the declarant's or the representative's serial number
- The declarant or the representative must have all authorisations required for import clearance
- The declarant and/or representative is responsible for the accuracy of declaration
- The guarantee is reserved from the declarant's or the representative's guarantee
- The name of the technical sender is not shown on Customs decisions
- Customs sends the periodic filing to the declarant or the representative
- Customs always sends the response messages to the technical sender, who is obliged to pass the messages on to the declarant or representative

Acting as a technical sender requires that changes be made to the import data system of the technical sender. The technical sender's information must be entered in the import declaration message.

2.3 The representatives impact on the import message declarant's status

Using a direct representative:

- the guarantee is reserved from the importer's (declarant's) credit, which means that the importer must hold a Customs authorisation for deferment of payment

Using an indirect representative:

- the declarant does not require a Customs authorisation for deferment of payment
- the guarantee is reserved from the representative's credit

Direct representative with the liability of a guarantor:

- the declarant does not require a Customs authorisation for deferment of payment
- the guarantee is reserved from the representative's credit

2.4 Transaction channels used in message exchange for import

Direct message exchange or operator-based transactions can be used for message exchange for import.

- In direct message exchange, the importer, i.e. the direct message declarant, sends messages in ML format to Customs via a public message interface by connecting to a public network (Internet).
- In operator-based message exchange, the company uses the services of data communications operators approved by Customs to transmit messages. Message exchange via an operator will remain as a supported service channel, but no new customers will be accepted.

3 Applying for message declarant status

3.1 Requirements regarding message exchange for import

- Customs requires that the company applying for message declarant status is competent regarding the import procedure and customs clearance, to ensure a smooth message exchange. When necessary, the company may request training by Customs business advisors regarding the import procedure before starting customer testing.
- The company must acquire customs clearance software that produces the required messages in accordance with the declaration standards provided by Customs. Customs does not provide the required software; companies should instead contact their own software

supplier. If a company has not selected a software supplier, a list of software companies is available at:

[Software companies providing systems for direct message exchange](#)

- To create a connection and to exchange messages in direct message exchange, the company must acquire a certificate granted by the Population Register Centre.
 - Customs identifies the message builder and the intermediary with the certificates. An ML format message created by the message builder is signed digitally using the certificate.
 - Customs identifies the business ID of the message builder by the certificate in the ML signature.
 - The intermediary needs a certificate for the connection. If the builder and the intermediary are one and the same, one certificate is enough.

More information about acquiring a certificate is available in the document “Message exchange with Finnish Customs: Technical guidebook” available here [Message exchange](#)

- In order to become approved as a message declarant for import, the company must test its customs clearance software and network connections with Customs. Customs also conducts testing with the software suppliers that provide customs clearance software. Testing is described in more detail in chapter 5.

3.2 Applying for import message declarant status

You can apply to become a Customs import message exchange declarant by completing customs form 934, which is available on the Customs website:

[Applying for an authorisation to use message exchange](#)

In direct message exchange, a company acting as message declarant and service provider must apply for authorisation to use direct message exchange.

When the application has been processed, the customer testing official at the Electronic Service Centre contacts the applicant company and arranges a time for testing.

3.3 Applying to become a technical sender

1. Applying for an authorisation:

You can apply to become a technical sender for import by completing customs form 934 for message exchange with Customs.

2. Testing:

After Customs has processed the application, the testing official at the Electronic Service Centre contacts the applicant in order to complete the testing. A message declarant applying to become a technical sender sends one test-message where the technical sender is provided. If the company is not yet a message declarant, its import customer testing must be approved.

3. Granting the authorisation:

When the testing has been done successfully, customs grants the company the right to act as a technical sender.

4 Business Information

When Customs has processed the company's application, a Customs business adviser will contact the company's contact person to arrange a consultation. One free consultation visit will be arranged before the testing. The business consultation can be provided over the phone or in person. It is recommended that both the import declaration expert and the message exchange expert of the company take part in the consultation meeting. The number of participants is not limited.

Matters concerning message declaration and electronic declaration in general are discussed during the consultation. More information and guidance on message declaration is available on Customs' website, where the company can check out the subject in advance. The consultation will cover issues such as:

- The Customs provision No 007/2016 on electronically submitted declarations and Customs' provision 008/2016 that regulate the verification of electronically submitted declarations and documents.
- Filing
- Message exchange: which messages the company must be able to send and receive
- message data-content: information that should be entered when filling in the application and when drafting ML messages: the message material is available on the tull.fi website: [Message descriptions](#)
- Procedures used by the company
- Topics related to the transaction channel
- The company's own questions

After the business consultation, the Customs testing official contacts the company's contact person, as indicated in the application, in order to set dates for the testing and for opening the connections.

5 Customer testing of message declarant for import

The aim of the testing is to ensure that the company sends messages that are as free of errors as possible once it has entered the production phase. During testing, the company submits import declaration messages with varying data content, to which Customs sends response messages (e.g. acceptance, error, request for additional information). The company sends appropriate responses to the response notifications; that is, corrects the errors or sends additional information.

The message declarant testing is carried out for each individual company (one business ID). There is no separate testing of individual offices (only the code extension of one office). The testing is undertaken separately for each data system. The company will have to undertake more than one testing only if it has several data systems in use at multiple offices. In the case of a group of companies, the testing will be carried out separately for each company (different business IDs).

Unless otherwise agreed, the applicant company's contact person for testing is the contact person for import message exchange mentioned in the application.

The software company's representative may assist the company in the testing, but the testing is always the responsibility of the importer or the representative. The company itself will cover the costs of testing.

If the company is planning to use, in production, such automated functionalities in its import software that were not mentioned during customer testing, these must be reported to the testing official at the Electronic Service Centre.

The testing official agrees with the company on the testing schedule, to which the company must commit.

The company should reserve enough resources for carrying out the customer testing within the agreed schedule. If the agreed schedule is not adhered to, the testing official can interrupt the testing and determine a possible new schedule for testing.

A company acting as a message declarant is responsible for ensuring that the personnel completing import declarations know how to transmit import declaration messages. Employees who lodge electronic import declarations must participate as much as possible in the testing.

5.1 Testing the connection for direct message exchange

The aim of the test cases for testing the direct message exchange connection (3+1 for the Message Notification Service) is to ensure that the customer's software and the Customs web service for direct message exchange are compatible. Since the web service acts as a transmission layer for import declarations, the aim is to ensure the technical functioning of the direct message exchange connection before the testing with import declaration messages is started.

The testing is optional if the company is already using direct message exchange with a Customs system, or if the company uses an intermediary that has already carried out the technical testing of the connections. When the time for testing is agreed on, Customs will send more specific instructions to the company on the testing of the direct message exchange connection. At this time, the company can also start using the message notification service for direct message exchange if it so wishes.

5.2 Technical testing

The purpose of the technical testing is to ensure that the data communication links are working and that the import messages sent by the customer comply with the message specifications.

The Customs testing official at the Electronic Service Centre carries out the technical testing in cooperation with the company who is applying for message declarant status. The testing is conducted in the customer testing environment of the import system ITU.

5.2.1 Material for technical testing

The testing official of the Electronic Service Centre will send to the company applying for message declarant status, the test cases draw up by Customs to be used for the technical testing. The Customs testing official chooses the test cases for the individual company according to its line of business and the nature of its transactions. The test cases are numbered. The number of the test case must be entered in the field 'Reference number'. In addition to the SAD form, some of the test cases also involve customs value declaration D.V.I. The test cases prepared by Customs contain only the particulars relating to the customs clearance transaction in question and which must be relayed unchanged in the message. Other necessary data must be complemented with the message description data.

Declarant details are the personal IDs or, if a representative is in question, the IDs of companies in their own customer base. The representative's own IDs are used as details of representative.

5.2.2 Passing the technical testing phase

The testing official of the Electronic Service Centre examines the transmission of the message in the communications network. The company's tester sends the customs declaration messages of the test cases to the testing official in the prescribed order and according to the agreed upon timetable. The testing official examines the clearance message to ensure that it corresponds with the message description. During the testing, the testing official and the company's representative together go through the structural errors regarding format and content, and the testing official informs the company's contact person of any errors that have occurred during testing. The company's tester corrects the errors that have occurred and the corrections are checked through re-testing.

The technical testing can be approved when all the declaration message test case examples have been carried out in a satisfactory manner, when the response messages sent by Customs have been tested, and when the errors and deficiencies that have emerged during testing have been rectified. The testing official informs the customer by email of the successful completion of the technical testing.

5.3 Parallel testing

The parallel testing phase can begin as soon as the technical testing has been successfully completed. The testing official agrees with the company on a date and time for the parallel testing and provides the company's contact person with the contact information of the parallel tester of Customs. During the parallel testing, the data declared in the documents are checked so that they match the message and the declaration, and that the company's declarations fill the requirements. The parallel testing can take two weeks at the most.

5.3.1 Material used in parallel testing

The materials used in the parallel testing are real declarations previously submitted by the company, therefore, the material consists of a customs declaration and attachments to the import declaration,

such as e.g. an invoice. The company's contact person should assemble the material so that it covers all the company's different customs clearance transactions.

The company's contact person sends to the parallel tester at the Electronic Service Centre copies of all documents relating to the declaration: the release decision, customs clearance decision as well as other clearance documents relating to the test cases. The parallel tester can present requirements regarding the test cases and accept/reject the transactions sent by the company. In the message, the company must enter the IDs of the parallel test cases in the field 'additional reference' in the declaration. The number is formed from the control reference determined for the company, e.g. HUOLI.

5.3.2 Approving the parallel testing

The parallel tester of the Electronic Service Centre will inform the company's contact person of any errors that have emerged during the testing, so that the errors are corrected while the testing is carried out. The company's tester corrects the errors that have occurred and the corrections are checked through re-testing.

The parallel testing can be approved when a sufficient number of test cases have been completed and the errors and deficiencies that have emerged have been rectified. The parallel tester of the Electronic Service Centre will inform the company's contact person by email of the successful completion of the parallel testing.

5.4 Changing from operator-based message exchange to direct message exchange

When the company changes from operator-based message exchange to direct message exchange, the company should send an application for direct message exchange with Customs (Customs form 934) and tick the box 'Amendment application'. Initiating direct message exchange requires approved customer testing with Customs.

The company must carry out a testing of the direct message exchange connection before doing the customer testing in the ITU system (chapters 5.1 and 5.2). The testing is optional if the company is already using direct message exchange with a Customs system or uses a service provider (intermediary) that has already carried out the testing of the technical connection.

Customer testing times with Customs:

- Testing the direct message exchange technical connection (only for new intermediaries): one week.
- Testing, either with Customs' testing material or the company's own material: no more than three weeks

Since messages in ML format are used in direct message exchange, all companies who previously used an operator for imports, must also carry out the technical testing. No separate parallel testing with the company's own material is required to ensure procedural competence. When the companies change over to direct message exchange they have plenty of own material to use, which

means that they can choose whether to use the customs test cases or their own material.

When a company's own material is used for testing, the company selects 5-15 import declarations already made in the production environment, and sends them in ML format to Customs' customer testing environment via direct message exchange. Before testing, the company must notify the Customs testing official of the customs clearance numbers of the import declarations, which it will be sending to the customer testing. When choosing test cases, the company must ensure that the data content of its own material covers the company's import operation (special procedure cases and product coverage cases required in the data content).

When choosing test cases, the company must observe the following:

- When a representative is used, the operator example provided by the Customs testing official is entered as declarant
- Sending a corrected, divided, advance and two-step customs declaration, also sending LCPs and periodic clearances, if needed

The test cases should contain:

- Declaring several goods items
- Declaring the office of unloading/entry
- Declaring goods in a customs warehouse and temporary warehouse
- Exceptional tax determination date
- Data connected to customs value declaration D.V.I; declaring different value data
- Declaring several currencies in the total price
- Additional statements on heading level (e.g. customs procedures with economic impact) as well as additional statements on the goods item
- Declaring several attachments both on heading level and goods item level
- Declaring several licensing authorities related to the attachment
- Terms of delivery, other than Incoterms
- Declaring several additional codes for the goods
- Declaring quantity and its qualifier as well as declaring repetition of other quantity (ACB, AAH, ACC, ABU)
- Declaring the IDs of containers
- Declaring the previous document for the goods item (previous, e.g. AREX and transit)

Detailed message content descriptions are available in the import data content guide on the Finnish Customs website

[Import message descriptions in the ITU system](#)

When importing it is possible to use both operator-based data connections and direct message exchange at the same time during the transitional period. Companies changing over from using an operator to direct message exchange have to make sure that, when necessary, any subsequent response messages to import declarations submitted via an operator can still be received via an operator. Customs always submits its response messages to the same transaction channel from where the customer's message has arrived. When a company no longer requires an operator-based message exchange connection, it should notify the Customs testing official about this. The

testing official and the customer agree on the date when the connections provided by an operator will be closed.

5.5 Testing the transmission of import attachments with the Message exchange testing service

The direct message exchange has an attachment message service, through which the company can send attachments for import declarations to Customs. Only **software companies** test this functionality and the testing is done in the testing service of the message exchange.

The testing is done with a test automation application, this means that Customs' customers can independently test direct message exchange regardless of time or place. The customers are able to test their own systems against the Customs interface and to verify that their systems can correctly produce the messages to be sent to Customs, and to handle the response messages from Customs.

The testing service will automatically perform the steps that the Customs testing official previously performed manually in real time. In problem situations, the customer can contact the testing official, but otherwise, the testing official does not participate in the testing.

The test cases for import declaration attachments created by Customs, are available in the testing service. Each test case contains instructions on the details to be declared in the test case and the measures to be taken. The testing official will set the testing time in the testing service, during which the company must successfully perform the testing.

The testing official will review the testing performed by the company via the testing service and will either approve the testing or ask the company to correct any errors found in it.

The user manual for the testing service is available on the tull.fi website:

[Customs message exchange testing service](#)

6 Starting message exchange for import

When the company has passed the customer testing, it will receive an authorisation decision on message exchange for import, and the company can start production at the time agreed on with Customs.

In direct message exchange, companies must make sure that messages are sent to the production environment.

The company will inform the testing official at the Electronic Service Centre of the time when the first customs declaration will be sent. If the start of the message exchange is postponed, the company must inform the testing official of the new start date.

The Electronic Service Centre may request that the company provide copies of the clearance papers in the beginning of the production phase.

6.1 Responsibility for message follow-up

The message declarant is responsible for message follow-up and transmission, and must make sure that a response is received for each message sent. A response message from Customs must be replied to as requested, for example with a corrected message, if Customs sends an error message.

6.2 Sending attachments

Based on their experience, the companies can predict to which import declarations the Customs testing official will be requesting additional information and attachments. The processing of the customs declaration will be considerably faster when the required attachments to the declarations are sent in advance, i.e. before they are requested by the testing official.

If attachments are sent upon Customs' request, the unfinished customs declaration will again end up in the processing queue at the Electronic Service Centre, which significantly delays the processing of the declaration, since it ends up twice in the processing queue.

6.3 Problem situations

In problem situations related to message exchange, the message declarant should resolve the problem by contacting the company's own Help Desk, operator or the service provider. If the problem causes an interruption in the message exchange, the instructions for the import fallback procedure defined on the tull.fi website should be followed.

7 Changes to the customs clearance software

If the company changes its customs clearance software, starts using a new version of it or changes their service provider or data communications operator, it must file an amendment application so that the need for testing can be determined. A new version, software or message exchange connection cannot be used prior to approval by Customs.

8 Cancellation of message declarant status

A message declarant status may be cancelled either for a period of time or permanently. Grounds for cancellation can be, for example:

- deliberate or negligent misuse;
- frequent mistakes which are left uncorrected;
- violation of the terms of the authorisation for message exchange;
- loss of authorisation for deferment of payment;
- the company's own notification;
- failure to comply with the archiving obligation

9 Rejection of the application

Customs will inform the applicant company of the rejection with a decision, which explains the reasons for the rejection, instructions for appeal and contact details for acquiring additional information.

10 More information

Further information is available in the guides on message exchange available on the Customs website:

“Message exchange with Finnish Customs: Technical guidebook” as well as

“Message exchange with Finnish Customs: Introduction to message exchange with Finnish Customs”.

The guides are available on the tull.fi website:

[Message exchange](#)

Questions on how to apply for message exchange for export customer status can be sent to [yritysneuvonta.lupa-asiakkaat\(at\)tulli.fi](mailto:yritysneuvonta.lupa-asiakkaat(at)tulli.fi)