**Mr. Stéphane Séjourné**

**EU Commissioner for Internal Market**

**C.C.: Mr. Maroš Šefčovič**

**EU Commissioner for Taxation and Customs Union**

Brussels, 2nd of June 2025

**Subject: E-commerce imports in the internal market**

Dear Commissioner Séjourné,

On behalf of the European Footwear Confederation (CEC), we write to express our deep concern over the structural challenges posed by the unchecked growth of low-cost parcel imports from ultra-fast fashion e-commerce platforms such as Shein and Temu. While we welcome the recent proposal introducing a EUR 2 handling fee for small parcels valued below EUR 150 entering the EU, we strongly believe that this measure is wholly insufficient to address the magnitude and urgency of the problem.

As you may know, a recent joint report by EUIPO and DG TAXUD reveals that **152 million counterfeit articles were detained in 2023**, a 77% increase from 2022, representing a total value of **EUR 3.4 billion**. Particularly alarming is the surge in counterfeit footwear products entering the Union. Around **80% of footwear sold in the EU is imported**, many of which fail to comply with established EU health, safety, and environmental standards, placing consumers at risk and severely undermining the competitiveness of compliant European producers.

European footwear companies are held to rigorous standards of sustainability, labour rights, and product safety. The current enforcement gap effectively legalises unfair competition, allowing certain platforms to evade their responsibilities for a negligible cost. The proposed EUR 2 fee, without accompanying enforcement mechanisms, risks becoming a **token gesture** rather than a meaningful deterrent. Moreover, the majority of Shein’s and Temu’s deliveries will just be charged with the fee of 50 cent because their parcels are usually handled by their own warehouses in EU.

We believe that **robust and immediate action** is required, and we therefore urge the Commission to consider the following:

1. **Implement comprehensive customs controls** that do not differentiate between B2C and B2B shipments, ensuring all parcels, regardless of destination, are subject to inspection.
2. **Dramatically increase market surveillance capacity**, both in terms of the number of checks and the technical quality of controls.
3. **Introduce targeted enforcement mechanisms** for platforms with consistent records of non-compliance.
4. **Establish real-time monitoring and alert systems** for imports from high-risk regions or platforms, especially considering the recent shift of ultra-fast fashion exports from the US to the EU following new US tariffs.
5. **To use an alternative and faster implementation mechanism for fighting this practice instead of waiting for the reform of the customs code, which will not enter into force until end of 2026-2027, in view of the scale and immediacy of the urgency Accelerate the implementation timeline.**

As reported by Reuters based on Sensor Tower data, recent advertising trends confirm our fears. Shein and Temu increased their marketing spend in France and UK by **35%,** and significantly as well in other EU countries, while reducing their presence in the US. This underscores the urgent need for a proactive and unified EU response to prevent the Union from becoming the next dumping ground for low-cost, non-compliant imports.

The situation is deteriorating rapidly. We call on the Commission and Member States to act with **urgency, ambition, and strategic foresight** to safeguard EU industries, consumers, and the integrity of our internal market.

We remain at your disposal to provide further industry insights and look forward to meaningful engagement on this critical matter.

      Yours sincerely,

**Rosana Perán Carmen Arias**

 **President Secretary General**