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Federal Department of Finance FDF

**Federal Office for Customs and Border  
Security FOCBS**  
Policy



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## **AEO explanatory notes**

on the application and self-assessment  
questionnaire

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## **1 General explanatory notes on the application procedure**

All required documentation and information on the AEO application procedure can be found on the Customs website: [www.aeo.admin.ch](http://www.aeo.admin.ch).

Each applicant must first complete the self-assessment questionnaire. Only one questionnaire needs to be completed per applicant.

To complete the questionnaire, you need to analyse and assess various areas of your company. It is therefore important to forward the various sections of the questionnaire to the competent units within your company so that the relevant information can be included in the document. The time required to complete the questionnaire depends on the size and activity of your company.

For the completion of the self-assessment questionnaire, one person in your company should be designated as the AEO officer, who is responsible for coordinating the entire questionnaire. Another person should be designated as the deputy AEO officer. These people assess the information received and, where necessary, check back with those who provided it before the responses are included in the questionnaire. They are also the first contacts for the Federal Office for Customs and Border Security (FOCBS) in the event of any queries.

Your company will undergo an initial assessment by the FOCBS on the basis of the responses in the questionnaire. **The clearer and more detailed the responses are, the faster the certification procedure can be carried out.** Relevant documentation, diagrams, flow charts, etc., can improve the meaningfulness of the responses.

## **2 Submitting the documentation**

Once the questionnaire has been answered truthfully, the application form needs to be completed. The original of the application must be signed by the authorised signatory(ies) in accordance with the commercial register and then be submitted. When submitting the documentation to the relevant regional level (see section 4), please note the following:

- It is mandatory to submit the application form in hard copy.
- Please submit the self-assessment questionnaire, the other associated documentation and the mandatory application enclosures electronically. You can do this via email or File Transfer Service ([www.filetransfer.admin.ch](http://www.filetransfer.admin.ch)).

To enable swift processing, please use the subject "Application for AEO status – company..." when sending documents electronically and by post. Once we have received the complete documentation (questionnaire, application with enclosures), we will acknowledge receipt in writing.

The documentation submitted will be formally reviewed by the relevant regional level. Following any clarifications or a preliminary audit, an audit appointment will be arranged with you. The information you provided will be checked on site and discussed with you.

The final result of the audit will be communicated to you in writing at a later date. You may be required to take certain measures to meet the approval criteria and complete the certification process.

Please note that we will process the submitted applications in the order in which they are received and in accordance with our available staff resources.

### 3 Instructions for completing the questionnaire

#### 3.1 General

The questionnaire is based on the Agreement on Customs Facilitation and Security<sup>1</sup>, the Customs Act<sup>2</sup>, the Customs Ordinance<sup>3</sup> and the Swiss guidelines<sup>4</sup> and EU guidelines<sup>5</sup> for authorised economic operators. It gives the FOCBS the opportunity to gain an insight into the company and to carry out a risk assessment. When assessing a criterion, all of the questions concerning the corresponding criterion are taken into account. This means that insufficient fulfilment of an individual criterion may not necessarily lead to rejection of the application if the criterion is nonetheless fulfilled when all factors are considered. This applies in particular to subsection 5.02, "Access to company premises" and subsection 5.03, "Physical security".

The AEO guidelines published on the Customs website [www.aeo.admin.ch](http://www.aeo.admin.ch) contain basic information on the structure and content of the questionnaire and specifically on the topic of AEOs. Further information can be found in the EU's [Explanatory notes for AEO self-assessment questionnaire](#)<sup>6</sup> (from page 136).

The questionnaire is divided into six sections:

- General company information
- (Customs)Compliance record
- Applicant's accounting and logistics system
- Financial solvency
- Safety and security requirements
- Contacts

In addition to the questionnaire, the enclosed "[List of business partners and service providers](#)" must also be completed, as well as the "[Location overview](#)" in the event of more than one location.

The questionnaire is electronic (Excel file) and contains filter questions. Depending on the response, irrelevant questions are automatically hidden. This makes it easier to check/read the questionnaire. We therefore recommend that you fill in the sections in chronological order, starting with tab 1 and finishing with tab 6.

In the event that you wish to make use of existing certifications, note these directly in the comments field for the corresponding question. Substantiate your information with relevant documents and send them to us as well. Points that are clearly substantiated and covered by certifications may not need to be verified again on site.

If no selection field applies or if you have no response or several responses to a question, please explain your response in the comments field of the questionnaire.

If you still have any uncertainties after completing the questionnaire, please contact the relevant regional level (see section 4).

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<sup>1</sup> Agreement on Customs Facilitation and Security [SR 0.631.242.05](#)

<sup>2</sup> Customs Act [SR 631.0](#)

<sup>3</sup> Customs Ordinance [SR 631.01](#)

<sup>4</sup> [Swiss guidelines](#)

<sup>5</sup> [EU guidelines](#)

<sup>6</sup> [AEO legislation and management instruments | Taxation and Customs Union \(europa.eu\)](#)

It is important that you complete the questionnaire as fully as possible to ensure that the consultation goes as smoothly as possible.

### **3.2 Additional explanations concerning selected sections of the questionnaire**

#### **3.2.1 Section 1.01.3 a) Locations**

Here you indicate the number of locations where your company operates. All branches (including pure office or warehouse locations) are considered locations. If you have more than one location, please list them individually on the additional "Location overview" form. In addition to the name of the location, please also state the exact address and the main activity carried out there. The registered office must be indicated separately. For companies with several locations, the questionnaire refers to the "Location overview" list, which indicates which question in the questionnaire the row refers to. If you have several locations, please note your responses directly in the overview list. If you already have your own overview list of your locations, you may also use this. If necessary, consult the relevant regional level (see section 4) and ensure that you provide all of the required information in the list of locations.

#### **3.2.2 Section 2.01.1 Which steps in the customs clearance process do you carry out yourself?**

The auditors will examine the entire customs clearance process as part of the audit. Therefore, pay sufficient attention to this question by describing the processes in as much detail as possible.

#### **3.2.3 Section 3.07.2 a) Has intrusion testing been carried out?**

Intrusion testing is generally required for all companies and also helps to raise awareness in order to counter the growing cyber-risks. As an applicant, you must have appropriate information technology measures (firewalls, antivirus programs, etc.) in place to protect your computer system against unauthorised intrusion and to secure your documentation. An intrusion test or the resulting test report is a very practical means of proving this protection.

If you have not yet carried out an intrusion test, we recommend that you arrange this as soon as possible and submit the proof of the mandate to the relevant regional level. This can have a positive effect on the certification decision.

#### **3.2.4 Section 5.02.1 a) What transport vehicles have the right to access the premises?**

##### **3.2.4.1 Description of the premises/company premises**

To prevent tampering with the goods, the applicant should have taken appropriate measures in accordance with [Article 112g letter c of the CustO](#) to prevent unauthorised access to **shipping areas, loading docks, cargo holds and other relevant places**. The term "premises/company premises" refers to all areas associated with the supply chain.

##### **3.2.4.2 Why is this information important?**

The criterion concerning access to company premises must always be seen in the context of physical security (see subsection 5.03) and cargo security (see subsection 5.04). Security measures must generally be designed as an overall package: if the applicant wants to protect its property (goods, data, buildings), it cannot strictly separate physical security and access control from the measures to secure its cargo.

In order to secure access to the premises and prevent tampering with the goods, the applicant must ensure that appropriate access control measures are in place to prevent unauthorised access to the premises, offices, shipping areas, loading docks, cargo holds and other relevant places.

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All areas in connection with the supply chain must be secured against unauthorised access. This applies not only to third parties, but also to the company's own employees who are not authorised to access these areas. Access controls apply to unauthorised persons and **vehicles**.

The aim of the measures to secure the company premises is to prevent unlawful intrusion or, in the event of intrusion or tampering, to ensure that appropriate measures are taken.

For example, it may pose a risk if a transport vehicle belonging to the AEO applicant is parked in an area that is fenced off, but to which unrestricted access is granted in principle to all visitors.

### **3.2.4.3 Special features of SMEs**

When examining this criterion, due consideration must also be given to the special features of small and medium-sized enterprises (SMEs). For SMEs, for example, more proportionate access control solutions may be available: instead of having employees monitor access to the company premises, a fence with an intercom system could be an option, for instance, so that access to the premises can be controlled remotely.

Measures such as instructions to employees to keep the doors to shipping areas locked and agreements with drivers to announce their arrival before entering the shipping area should also prevent unauthorised access to the cargo holds.

### **3.2.5 Section 5.03.5 Opening and operating hours**

Specify on which days and at what times customers and suppliers are received (opening hours) and when work is carried out on the company premises (operating hours).

### **3.2.6 Section 5.11.1 b) Key positions**

After certification, an AEO must obtain official extracts from the register of convictions when filling key positions within the company (in addition to the existing checks).

As a rule, examples of key positions within the meaning of the questionnaire include members of management, finance manager, warehouse manager, production manager, compliance manager, HR manager and customs manager. Depending on the security situation and supply chain connection, other positions may also be considered key positions by the FOCBS.

### **3.2.7 Section A6 Persons required to be entered in the commercial register (other than the applicants)**

Particularly in the case of larger companies, the list of people obliged to be entered in the commercial register can be very long. This is taken into account and you do not have to list everyone who is entered in the commercial register in the questionnaire (persons in charge of the applicant company or exercising control over its management). In the event of any uncertainties, please get in touch with your contact person in accordance with section 4.

## **4 Contact points and persons**

For assistance with the application, please contact the relevant regional level:

Cantons AG, BL, BS:  
Basel South Customs  
Tel. 058 466 14 00  
[zoll.basel\\_sued\\_up@bazg.admin.ch](mailto:zoll.basel_sued_up@bazg.admin.ch)

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Principality of Liechtenstein and cantons AI, AR, GR, SG:  
St Gallen/Liechtenstein Customs  
Tel. 058 481 23 23  
[zoll.sgfl\\_up@bazg.admin.ch](mailto:zoll.sgfl_up@bazg.admin.ch)

Cantons GL, LU, NW, OW, SH, SZ, TG, ZH, ZG:  
Zurich Customs  
Tel. 058 481 30 80  
[zoll.zuerich\\_up@bazg.admin.ch](mailto:zoll.zuerich_up@bazg.admin.ch)

Cantons BE, FR, JU, NE, SO:  
Central Switzerland Customs  
Tel. 058 463 44 97  
[zoll.mittelland\\_up@bazg.admin.ch](mailto:zoll.mittelland_up@bazg.admin.ch)

Cantons GE, VD, VS:  
Vaud Customs  
Tel. 058 465 54 00  
[douane.vaud\\_ce@bazg.admin.ch](mailto:douane.vaud_ce@bazg.admin.ch)

Cantons TI, UR:  
Sopraceneri Customs  
Tel. 058 480 54 30  
[dogana.sopraceneri\\_ca@bazg.admin.ch](mailto:dogana.sopraceneri_ca@bazg.admin.ch)