

Brexit - No Deal Checklist from the RHA

06 August 2019

Version 10

This checklist applies to a no deal and no transition Brexit only. As things stand at the time of writing, that is 23:00 on the 31 October 2019. **It is vital that Importers, Exporters and transport businesses prepare in advance. Failure to do so will result in lorries being prevented from crossing the border. Government requirements are that ALL lorries must have complete documentation for ALL shipments BEFORE lorries will be permitted to board ferries or trains.** If a withdrawal agreement is put in place the information and actions will no longer apply. **New text highlighted in red.**



More Information: www.rha.uk.net

| Issue | When | Action | Notes |
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| Register for Government Updates | Now | hauliers can register to receive updates from the various dept e.g. DVSA, HMRC | https://www.gov.uk/help/update-email-notifications |
| International Haulage Operators. Get a <u>UK</u> EORI Number (Economic Operator Registration and Identification number) | Now | International operators MUST obtain a UK EORI number to trade across UK - EU border - this will be needed for customs. Application for a VAT registered business is almost instant. If you have a VAT number, you can check to see if it has EORI status. This will be a requirement for the Safety & Security Declaration when it becomes applicable. | This costs nothing to do - and will be needed under all Brexit outcomes - ACT NOW. Check here to establish if you have an EORI number. To apply for EORI visit:- Get EORI |
| UK International Haulage Operators. Get an <u>EU</u> EORI Number (Economic Operator Registration and Identification number) | Wait | Operators will need to obtain an EU EORI number but we are waiting for confirmation how this can be obtained before Brexit and action to take. | |

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| <p>Hauliers must tell Customers (Importers and Exporters) you deal with that THEY must do these 2 things, or they will not be able to trade with the EU by road.</p> | <p><u>Now</u></p> | <p>Hauliers must ensure customers KNOW that traders need to:-</p> <ol style="list-style-type: none"> 1. <u>Obtain an EORI number</u> (it is easy & free), 2. <u>Arrange for an agent to undertake customs formalities</u> (difficult, but essential). <p>In addition, advise importers that they need to consider registering for Transitional Simplified Process once they have an EORI</p> | <p>Many traders have not taken the basic actions to prepare for no deal Brexit. <u>Exporters and Importers need to do their bit – they will need to provide complete documentation for all customs processes. Lorries with incomplete documentation will be prevented from crossing the EU<>UK border.</u></p> <p>It is essential that all traders prepare now.</p> <p>There is no list of minimum documents - when available will share with members.</p> |
| <p>Trailer Registration - Trailers used in EU (except Ireland)</p> | <p><u>Now</u></p> | <p>ACT NOW. Regardless of Brexit, all UK trailers <u>in international commercial road haulage (except Ireland)</u> above 750kgs need to be registered from 28 March 2019.</p> | <p>The website is now live for applications</p> <p><u>Access the trailer registration website - here.</u></p> |
| <p>CMR Notes</p> | <p><u>Now</u></p> | <p>CMR notes will form part of pre-checking processes before lorries pass through ports. Incomplete CMR's may result in refusal to board. Operators need to ensure that CMR Notes are routinely completed to a high standard - with correct goods descriptions and other details.</p> | <p>CMR notes also form part of a hauliers trading conditions - <u>there is an obligation on the customer to fulfil formal processes that may assist operators establishing liabilities for delays at ports.</u> Further information is available <u>here</u>.</p> <p>CMR notes can be obtained from the <u>RHA Shop</u>.</p> |

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| Driving Licences (Lorries) in the EU - International Drivers Permits | <u>Now</u> | New agreements mean that UK Driving Licence holders will only need International Driving Permits when entering SOME EU countries. At 10 June UK licence holder WILL need IDP's to drive in Bulgaria, Croatia, Cyprus, the Czech Republic, France, Italy, Malta, the Netherlands, Romania, Slovakia and Sweden. UK photo licence holders will NOT need IDP's to enter Austria, Belgium, Denmark, Estonia, Finland, Germany, Greece, Hungary, Ireland, Iceland, Latvia, Lithuania, Luxembourg, Malta, Norway, Poland, Portugal, Slovenia, Spain or Switzerland. Further information:- here. | Given the limited time until a potential no deal - it is recommended that drivers act over coming months to avoid potential backlog in October. Drivers should note that France, the Netherlands and Italy will require 1968 IDP's. Access the Post Office information on obtaining an International Drivers Permit – here. |
| Employer Toolkit (EU Settlement Scheme) | <u>Now</u> | The Government has produced guidance for employers on the new "Settled Status" scheme for employers who have staff from the EU. Employers with EU Staff should review the documentation provided. | Click here to access the toolkit. |
| Import/Export Declaration Data (Exporters and Importers) | <u>Now</u> | <u>Exporters and Importers</u> will be responsible for ensuring customs declarations are made. They need to decide how and who will submit declarations to customs. | This is CRITICAL - Traders need to be preparing for using customs codes for all commodities, producing commercial invoices and packing lists for all shipments , and ensuring that paperwork is of sufficient standard for processing customs. |
| Common Transit Convention | <u>Now</u> | CTC is strongly favoured by EU/UK authorities as the preferred method of customs control for post Brexit road haulage. Operators should investigate the requirements for setting up to use CTC if they have not already done so. This may involve working with partners in the EU. | There is uncertainty from HMRC over processes. It will be complex for operators. Information is available – here . We are expecting further information from HMRC on potential locations for "Offices of Transit" that will be needed to make any systems work. |

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| TIR | Now | TIR will be available for transport between the UK and the EU. The RHA will provide further information for members in August as we seek to clarify further details with HMRC. | All TIR rules will apply for EU TIR movements in the event of a no-deal Brexit. For some operators this will be a practical option, especially for groupage operations, given the "per lorry" guarantees rather than the "Per shipment" guarantees under CTC. |
| UK Transport Manager CPC - working in the EU | August | For those working in the EU, routine recognition of UK held CPC qualifications will end upon Brexit. | UK transport managers working in the EU need to contact authorities in the State they are working in to have the CPC qualification transferred to the EU State. |
| Driver CPC - UK drivers working for EU operators | August | For those working in the EU, routine recognition of UK held CPC qualifications will end upon Brexit. | UK Drivers working in the EU for EU based operators need to contact authorities in the State they are working in to have the CPC qualification transferred to the EU State. More information is available here. |
| Drivers - UK Passport holders | Now | All drivers should check and make sure there is 6 months validity on passports from October 2019 | |
| Export Safety & Security Declaration (also known as the Entry Summary Declaration) | September | All operators (EU and UK) will be responsible for making Safety and Security declarations. | Clear guidance is not in place. French processes were well developed and appeared practical, but guidance has been retracted. When possible, detailed advice will be provided to operators. |
| Import Safety & Security Declaration (also known as Entry Summary Declaration) | September | The inbound Safety & Security declaration requirement has been suspended until September 2019 | The requirement has not 'Gone Away', but HMRC have accepted the industry is not in a situation to be able to comply with it. More information will be provided when known. |
| Customs and Road Network Management | Wait | Customs processes WILL need to take place before export movements take place. Detailed traffic management will be put in place for transport via Dover Straits and other major ro-ro routes. | Locations where scanning for Common Transit Convention movements and any other processes are yet to be finalised. BUT - it is expected that ALL lorries will be checked at check-in for compliance with customs rules before being able to cross the channel. Any lorries without correct paperwork WILL be refused boarding. |
| International Permits (Community Licence alternative) | Wait | Current Community Licences will still be used in 2019 for UK <> EU trade under no deal. | Limited cabotage and cross-trade between UK States by UK operators will be allowed in 2019. |
| International Permits (ECMT Annual) | Wait | ECMT permits may be needed to move goods to and from non-EU countries. | ECMT will only be needed in the event of a a no deal. If there is a 31 October no deal it is expected that there will be sufficient ECMT to meet demand in 2019. 2020 is uncertain. |

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| ECMT Certificates of Conformity | Action only if ECMT needed | Operators who use ECMT permits will need to obtain certificates of conformity for the vehicles they will be using. These should be obtained from manufacturers. | An ECMT 'certificate of compliance' must be in a vehicle, these confirm the vehicle and trailer any technical requirements. More information will be given to those who obtain permits. |
| Irish / UK Border – Transit Requirements | Wait | To be clarified | Shipments - Republic of Ireland to/from EU via UK landbridge and Northern Ireland to/from GB via Republic of Ireland may require Customs transit formalities to effect shipments. |
| New non-EU Visa requirements. e.g. Visas for entering Serbia | Wait | To be clarified | Some countries may require visas for UK drivers entering to undertake international haulage. Not likely but RHA will be checking for V11 of this document. |
| International Permits (Bilateral) | Wait | There are no bilateral permits to apply for at this time. | No action on this will be possible until any new bilateral permits are introduced. Unlikely to be required in 2019. |
| AEO (Authorised Economic Operator) | Wait | It may be advantageous for some hauliers to obtain AEO status. However, the advantages may be limited. | Some shippers and/or consignees may wish operators to obtain AEO status. |
| Carry on board paperwork | Wait | To be clarified | Will update when known. |
| VE103 Certificates (Vehicles on hire or lease) | Wait | To be clarified as soon as possible | Possible problem if these are no longer recognised after Brexit |
| Fuel - cross border limits | Wait | Current EU rules will end. Many States impose limits on fuel allowed in without being subject to duty. This can be as low as 200 litres, but does vary State to State | More information will be obtained and shared as known. |
| Driver 3rd Country attestation forms | Wait | To be clarified | |
| VAT - Fuel rebate claims | Wait | To be clarified | |
| Medicines - Government ferry capacity for Category 1 goods | Wait | Processes agreed with sector. Further information will be provided in V11. | |
| Insurance - Green Card for Tractors & Trailer | Wait | If the UK leaves on 31 October it is currently expected that Green Cards will be needed. | https://www.gov.uk/guidance/prepare-to-drive-in-the-eu-after-brexit |
| Restricted Operator Licences in the EU – 2019 only | No Action | The EU legislation covering permits will also authorise restricted operators to carry goods between the EU and the UK in 2019. | There are no clear arrangements for 2020 or beyond. |

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| Vans – 2019 only | No Action | The proposed EU legislation covering permits will also authorise vans to carry goods between the EU and the UK in 2019. | There are no clear arrangements for 2020 or beyond. |
| International REMOVAL Permits (ECMT Annual) | No Action | ECMT will not be needed for most UK <> EU removal operations as it will be covered by the new "Community Licence" replacement in 2019. ECMT will be needed for NON-EU removals in 2020 as things stand. (No action possible now). | The system is in place - removal companies will be able to use ECMT removal permits post Brexit. |
| Cabotage in the UK for EU operators | No Action | UK Government has agreed to allow EU Operators to continue to undertake cabotage in the UK | The Government has said this may change if the EU does not reciprocate. |
| EU Transport Manager CPC in the UK | No Action | UK recognising EU qualifications | |
| Driver CPC - for drivers working for UK operators | No Action | No action needed | UK drivers working for UK operators will still be able to drive in the EU - the UK CPC remains valid when working for UK Operators. (Drivers will require an International Driving Permit). EU Driver CPC's will still be recognised in the UK. |
| Further topics will added in updates | | | |

***If there are topics that should be added to this check list please email
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