

GB <> EU Border - Operator Checklist from the RHA

22 October 2020

Version 2

The UK will come out of transition at 23:00hr 31 December 2020 (GMT). **Importers, Exporters and transport businesses must prepare in advance.** Failure to do so will result in lorries being prevented from crossing the border. ALL lorries must have complete documentation for ALL shipments BEFORE lorries will be permitted to board ferries or trains. **This will be the case with or without a "deal", customs controls will apply between GB and the EU from 1.1.21**



Anyone importing or exporting goods between Great Britain & the EU needs to understand who is responsible for deciding how goods will be moved, who will move the goods and who will submit paperwork on behalf of importers and exporters. This checklist is designed to point towards the basic decisions that need to be taken before 1.1.21. The detailed processes for handling shipments under Pre-Declaration, Transit, ATA Carnet or TIR will be dealt in future checklists. **New text in this version is highlighted in RED.**

No lorry should attempt to cross the GB - EU border without complete border paperwork

More Information: www.rha.uk.net

Issue	When	Action	Notes
All users of the Border need to understand what processes will apply to them after 1.1.21	Now	The RHA recommends that all importers, exporters and hauliers review the most recent Border Operating Model. It contains key information. It is not as clear as it should be in all areas, but it does contain key information. A Haulier Handbook will be made available in early November.	The full +260 page document can be accessed at :- https://www.gov.uk/government/publications/the-border-operating-model
Importers & Exporters in the UK and EU MUST know the INCO Terms for every shipment to be moved.	Now	This is a vital first step for all transactions. Every exporter and importer must be clear about who will complete their customs processes, who decides how the goods will move, transit insurance & who is paying freight charges BEFORE any shipment can be moved. These issues are defined by INCO terms.	<u>More information can be found here:-</u> https://en.wikipedia.org/wiki/Incoterms

Importers & Exporters in the UK and EU MUST know who will be undertaking all customs declarations.	<u>Now</u>	<u>Customs declarations are a traders responsibility.</u> Traders must make arrangements to have someone do export / import declarations. It is essential traders in the UK and EU know who will make declarations.	We recommend traders speak to their haulage company / logistics provider & investigate what services are available. Note, it is rare but some traders may wish to do their own customs work in house.
All users of the border need to register for Government Updates	<u>Now</u>	Traders & hauliers can register to receive updates from the various dept eg DVSA, HMRC	https://www.gov.uk/help/update-email-notifications
<u>International Road Haulage Operators</u> will need to decide what border / customs services they can offer to customers.	<u>Now</u>	Decide now what services will be offered. Ensure all border processes and obligations are understood for services offered.	Core models for moving road haulage will be CTC Transit, Pre-declaration, ATA Carnet or TIR. Each one has its own processes that MUST be understood.
UK Traders will need a UK EORI Number to be able to trade with the EU by road.	<u>Now</u>	Most VAT Registered businesses will have one already. Getting an EORI number for UK Traders that do not have one is easy & free.	To apply for EORI visit https://www.gov.uk/eori
Traders need to find the Commodity Codes for all goods they move.	<u>Now</u>	Commodity codes are needed for customs declaration. Commodity Codes have to be communicated to whoever is doing customs declarations	A link to the UK Govt website where commodity codes can be obtained. https://www.gov.uk/trade-tariff
EU and UK <u>exporters</u> must put in place systems to produce <u>Commercial Invoices</u> that contain all the data needed to produce customs and border documentation.	<u>Now</u>	Not all Commercial Invoices produced by company accounting systems produce invoices that contain the right data to complete customs or other border processes. Traders need to act now to ensure goods are properly identified.	Traders should discuss requirements with their primary customs agent or logistics company to work towards compliance.
<u>All International Haulage Operators.</u> Get a <u>UK</u> EORI Number (Economic Operator Registration and Identification number)	<u>Now</u>	UK International operators MUST have a UK EORI number to trade across UK - EU border - this will be needed for border formalities. Most will have this already. Application for a VAT registered business is almost instant.	<u>This costs nothing to do - ACT NOW.</u> To apply for EORI visit https://www.gov.uk/eori

UK International Haulage Operators will need to get an <u>EU EORI</u> Number (Economic Operator Registration and Identification number)	<u>Action in November</u>	It is compulsory for UK based international operators to have an <u>EU EORI</u> number from 1.1.21. This will be needed for EU customs and EU Safety & Security Declarations.	Belgium has opened up applications for this. Others will open shortly. Any new EU EORI number issued will not be valid until 1.1.21. Link to the Belgium information page and form: https://finance.belgium.be/en/customs_excises/enterprises/brexit/more-info/eori-gb The RHA will advise when other countries open applications. Only 1 EU EORI number is needed, it can be issued by any EU Member State.
UK International Operators, access for lorries to the EU market (International Operator Licences/Community Licence alternatives)	<u>Action in November</u>	ECMT permits will open for application on 2 November. Full arrangements for UK operator access to the EU after 1.1.21 is yet to be determined.	Further details on ECMT and replacement for the Community Licence will be provided through Brexit pages on www.rha.uk.net
Pallets and/or any wood used for packing purposes transported to the EU will need to conform to ISPM 15	<u>Now</u>	Pallets/wood need to have been heat treated to a temperature of 56C to comply with the ISPM 15 EC requirements	More information is available at :- https://www.gov.uk/wood-packaging-import-export
UK Trailer Registration	<u>Now</u>	This is a reminder that all UK trailers used in international commercial road haulage (except Ireland) above 750kgs must be registered, this rule has been in place since March 2019.	Link:- https://www.gov.uk/register-trailer-to-take-abroad
CMR Notes	<u>Now</u>	CMR notes for international haulage will still be required after 1.1.21	It's possible these will be checked against customs declarations.
EU Operator access to the UK market (International Operator Licences)	<u>Wait</u>	Arrangements for EU operator access to the UK after 1.1.21 is yet to be confirmed.	Fall back positions in event of no deal include quota limited ECMT Permits, however this is unlikely at least initially.
UK Operator Cabotage in the EU	<u>Wait</u>	There is no certainty that cabotage will be permitted from 1.1.21. Any cabotage arrangements will be defined by limits set in any Brexit Trade Agreement or contingency arrangement between the UK and EU.	<u>Businesses that use cabotage should consider how they will operate if cabotage is no longer permitted or is limited by any agreement made for haulage operations after 1.1.21.</u>

EU Operators Cabotage in the UK	Wait	There is no certainty that cabotage will be permitted from 1.1.21. Any cabotage arrangements will be defined by limits set in any Brexit Trade Agreement or contingency arrangement between the UK and EU.	<u>Businesses that use cabotage should consider how they will operate if cabotage is no longer permitted or is limited by any agreement made for haulage operations after 1.1.21.</u>
UK Operators Cross Trade (Carriage of loads between 2 EU States)	Wait	Arrangements for UK operators moving goods between EU States after 1.1.21 is yet to be determined. Arrangements will be defined by any Brexit Trade Agreement between the UK & EU.	Regardless of outcome, some cross trade will be possible using the ECMT Permit system.
UK Transport Manager CPC - working in the EU	Now	For those working in the EU, routine recognition of UK held CPC qualifications will end from 1.1.21.	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.
EU Transport Manager CPC - in the UK	No Action	Current plan is that at least initially the UK will recognise EU qualifications	
UK Drivers - Driving Licences in the EU - International Drivers Permits	Drivers CHECK NOW & Act if needed	It is likely that International Drivers Permits will be required to drive in the EU after 1.1.21. All lorry drivers should act now if they do not have International Drivers Permits for the countries that will be entered. If a driver already has one they need to check it is still in date and valid for countries being entered.	To obtain an IDP a driver will need to apply in person at selected post offices with photo ID eg passport/driving licence and a passport photo. Note: Different countries use different permits, there are 3 types in use. Click on link in notes for post office info. https://www.postoffice.co.uk/international-driving-permit
UK Driver CPC - UK drivers working for UK operators	No Action	UK Drivers UK obtained CPC will be valid in the EU when working for a UK haulier.	
UK Driver CPC - UK drivers working for EU operators	Now	For those working in the EU with EU operators 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 in which they are based.
UK Drivers - UK Passports	Now	All drivers should check and make sure they always have at least 6 months validity on passports from January 2021	<u>ACT NOW IF A DRIVER HAS A SHORT VALIDITY ON A PASSPORT.</u>
EU Driver CPC - for EU drivers working for UK operators	No Action	Current plan is that at least initially the UK will recognise EU qualifications	

<u>Van Operators & Drivers</u>	Now	All customs processes that apply for traders using Lorries to cross borders will apply to Van operations.	Van operators need to engage with traders and advise them of the need to comply with all paperwork requirements from 1.1.21.
Goods Vehicle Movement Service (GVMS)	Wait	From 1.1.21 GVMS will be used for CTC transit movements and GB>Northern Ireland movements. From July 2021 GVMS will be used for all international road haulage.	Further details will be provided when available. This system is in development so we will need to wait to see what will be live from 1 Jan 2021. GVMS is being tested now and will be compulsory when using CTC Transit processes.
Smart Freight / Check an HGV is Ready to Cross the Border	Wait	A "Smart Freight" System (now called "Check an HGV is Ready to Cross the Border") will control access to Kent from 1.1.21. All HGV's exiting the UK from Dover / Eurotunnel will only be permitted to enter Kent if the vehicle has been issued with a permit. To get a Kent Access Permit (KAP) basic data will need to be entered into a government web portal,	A test site can be viewed here:- https://check-an-hgv-is-ready-to-cross-the-border-demo.fbplatform.co.uk/
Safety & Security Declaration to enter the EU. (also known as the Entry Summary Declaration)	Now	All operators (EU and UK) will be responsible for making Safety and Security declarations when entering the EU from the UK. The rules and procedures vary according to the route being used.	Annexes in the latest Border Operating Model provide information on requirements. Separate detailed advice by RHA is in development, this will be provided to operators shortly.
Safety & Security Declarations to enter the UK (also known as Entry Summary Declaration)	Wait	The GB inbound Safety & Security declaration requirement has been suspended until July 2021	The requirement has not 'Gone Away'. More information will be provided when known.
Temporary Inland Customs processing sites	Wait	Customs processes WILL need to take place before export movements take place. Temporary Inland Border Facilities may be provided to complete essential paperwork.	Locations where scanning for Common Transit Convention movements and any other processes are yet to be finalised.
Insurance Green Card for Tractors & Trailer	Now	Green Cards will be needed from 1.1.21.	
Health Insurance	Wait		There are no clear arrangements for 2021 or beyond.

Restricted Operator Licences in the EU	Wait		There are no clear arrangements for 2021 or beyond.
VE103 Certificates (Vehicles on hire or lease)	Wait		There are no clear arrangements for 2021 or beyond.
VAT - Fuel rebate claims	Wait	To be clarified	
Fuel - cross border limits	Wait	Current EU rules will end. This could be impacted by any Free Trade Agreement	More information will be obtained and shared as known.
Removal Operations	Wait	HMRC to advise what, if any declaration will be required for loads to/from UK	ECMT Removal Permits are already available if required and no alternative access to EU
Vehicle (car) Recovery	Wait	HMRC to advise what, if any declaration will be required for loads to/from UK	
AOG Consignments (Aircraft on Ground)	Wait	HMRC to advise what, if any declaration will be required for loads to/from UK	
Further topics will added in updates			

If there are topics that should be added to this check list please email h.wallace@rha.uk.net