

Brexit - No Deal Checklist from the RHA

04 March 2019

This checklist applies to a no deal and no transition Brexit only. If a withdrawal agreement is put in place the information and actions will no longer apply. However, it will not be known for some time if there will be a transition agreement, it is recommended that all actions suggested are undertaken if the circumstance described applies. **New text highlighted in red.** The top several items relate to permit and international access issues.



More Information: www.rha.uk.net

Issue	When	Action	Notes
Register for Government Updates	Now	hauliers can register to receive updates from the various dept eg DVSA, HMRC	https://www.gov.uk/help/update-email-notifications
International Permits (Community Licence alternative)	No Action	It is likely that UK operators will be allowed to continue to operate permit free between the UK and the EU in 2019. The legal regulation to allow this has been agreed in principal in the EU, but still needs to pass in Parliament and Council.	This is expected to be confirmed by Mid-March. ECMT permits will still be needed to access non-EU countries. The status of cross-trade and cabotage is uncertain. Follow news from the RHA web site for updates. https://www.rha.uk.net/policy-campaigning/brexit-and-the-uk-haulage-industry
International Permits (ECMT Annual)	Now	More EMCT permits have become available, a new application process will open soon. As noted above, a temporary arrangement for 2019 is likely to be in place. This will eliminate the need for ECMT permits for haulage between the UK and the EU.	Those who have already applied and were unsuccessful will automatically be included in future allocations. Those who did not apply earlier and those with Euro V will also be able to this week. While it is still a lottery, with the likelihood that UK <> EU traffic will not need ECMT permits, there should be enough permits to meet demand.
International Permits (ECMT Monthly)	No Action	DfT decided to delay issuance of any monthly permits .	Allocation of monthly permits will happen after the annual permits are distributed and it is clear

Cross Trade (carriage of international between 2 EU States)	WAIT	If an agreement does get signed, it may still be a requirement to have ECMT permits for cross-trade	The RHA recommends that anyone needing to do cross-trade that they should seek ECMT permits if not already applied.
ECMT Certificates of Conformity	Mar-19	Operators who use ECMT permits will need to obtain certificates of conformity for the vehicles they will be using.	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.
Drivers - UK Passport holders	Now	All drivers should check and make sure there is 6 months validity on passports from March 2019	Given the limited time until a potential no deal - it is recommended that drivers act now to avoid potential backlog in late March.
Driving Licences (Lorries) in the EU	Now	International Driving Permits will be needed by drivers holding UK licences. Drivers need to apply in person at selected post offices with photo ID eg passport/driving licence and a passport photo. Click on link for post office info.	https://www.postoffice.co.uk/international-driving-permit
CMR Notes	Now	Operators need to ensure that CMR Notes are routinely completed to a high standard with correct goods descriptions and other details.	Further information is available at https://www.gov.uk/guidance/moving-goods-by-road CMR notes can be obtained from the RHA Shop http://www.rhaonline.co.uk/shop.php
EORI - UK (Economic Operator Registration and Identification number)	Now	International operators MUST apply for Economic Operator Registration and Identification number - this will be needed for customs. If you have a UK 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.	Check here to establish if you have a number www.ec.europa.eu/taxation_customs/dds2/eos/eori_validation.jsp?Lang=en To apply for one visit https://www.gov.uk/eori

Employer Toolkit (EU Settlement Scheme)	Now	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.	https://www.gov.uk/government/publications/eu-settlement-scheme-employer-toolkit?utm_source=7057ffdc-5bae-4f45-8db1-a4b98b87fc26&utm_medium=email&utm_campaign=govuk-notifications&utm_content=daily
Import/Export Declarations (Exporters and Importers)	Now	Exporters and Importers need to be preparing for using customs codes for their commodities and ensure that paperwork is of sufficient standard for processing in customs.	Exporters and Importers should consider how they will to do customs declarations after Brexit (MOST will need to find use a customs agent). They will need to obtain EORI numbers too from HMRC.
Trailer Registration	Now	The website is now live for application https://www.gov.uk/register-trailer-to-take-abroad	Regardless of Brexit, all UK trailers in international commercial road haulage above 750kgs will need to be registered by 28 March. (Except Ireland)
Common Transit Convention	Now		We are awaiting further guidance from HMRC. Those with existing customs facilities for road freight should investigate what actions need to be taken with European partners.
UK Transport Manager CPC - working in the EU	Now	For those working in the EU, routine recognition of UK held CPC qualifications will end.	EU States may chose to continue to recognise UK issued CPCs, but this cannot be guaranteed. UK transport managers working in the EU need to contact authorities in the State they are working in.
Driver CPC - UK drivers working for EU operators	Now	For those working in the EU, routine recognition of UK held CPC qualifications will end.	EU States may chose to continue to recognise UK issued CPCs, but this cannot be guaranteed. UK transport managers working in the EU need to contact authorities in the State they are working in.
EU EORI Numbers	Mar-19	Operators will also require an EU EORI number to undertake haulage between the EU and the UK for EU Safety & Security Declaration.	<i>HMRC to advise when / how this should be done. Until then UK operators should take no action other than ensuring they have a UK EORI. EU operators will need to obtain a UK EORI number after Brexit.</i>

Insurance - Green Card	Mar-19	It's not been made clear yet as to whether Green Cards will be required for combination vehicles or separate for tractor and trailer.	DfT/MIB are seeking clarity from the EC.
Restricted Operator Licences in the EU	No Action	The proposed EU legislation covering permits will also authorise restricted operators to carry goods between the EU and the UK.	
Vans	No Action	The proposed EU legislation covering permits will also authorise vans to carry goods between the EU and the UK.	
International REMOVAL Permits (ECMT Annual)	No Action	ECMT available permit for REMOVALS ONLY	The system is in place - removal companies will be able to use ECMT removal permits post Brexit. Review Mid-March
Import Safety & Security Declaration	No Action	The inbound Safety & Security declaration (also known as Entry Summary) 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.
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.
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.
Cabotage in the EU for UK operators	Wait	Limited cabotage may become possible - but will not know until mid March.	

Export Safety & Security Declaration	Wait	All operators (EU and UK) will be responsible for making Safety and Security declarations.	HMRC to provide clear guidance on the UK responsibilities for operators. No information available regarding the EU requirements for EU bound freight. When known the the RHA will alert the sector about what will need to be done, how and when.
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
Driver 3rd Country attestation forms	Wait	To be clarified	
Driver Attestation of Activities (Tacho records)	Wait	To be clarified	
VAT - Fuel rebate claims	Wait	To be clarified	
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.
TIR	Wait	To be clarified	
Fines	Wait	To be clarified	
Tolls	Wait	To be clarified	
Euro rating evidence	Wait	To be clarified	
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