

Brexit - No Deal Checklist from the RHA

10 June 2019

Version 9

This checklist applies to a no deal and no transition Brexit only. **As things stand at the time of writing, the likely timing is 23:00 on the 31 October 2019 - that is the assumed date for a Brexit no deal in this checklist. It is vital that businesses continue to prepare.** 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
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
Trailer Registration - Trailers used in EU (except Ireland)	Now	ACT NOW. Regardless of Brexit, all UK trailers in international commercial road haulage (except Ireland) above 750kgs need to be registered from 28 March 2019.	The website is now live for application https://www.gov.uk/register-trailer-to-take-abroad
Hauliers - Provide advice to customers	Now	Hauliers need to ensure their customers who have no customs experience at least do the following three things:- 1. Obtain an EORI number (it is easy & free), 2. Once they have an EORI, register for Transitional Simplified Processes, 3. Arrange for an agent to undertake customs formalities (difficult, but essential).	Many traders have not yet taken basic actions to prepare for no deal Brexit. If customers do not do their bit, operators will be held at borders. It is essential that all traders start to prepare. If they do not, their goods will not be able to move across borders and they will add to delays.
CMR Notes	Now	CMR notes will form part of the pre-checking processes at 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.	CMR notes also form part of a hauliers trading conditions - there is an obligation on the customer to fulfil formal processes that may assist operators establishing liabilities for delays at ports. 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

<p>Driving Licences (Lorries) in the EU - International Drivers Permits</p>	<p>Now</p>	<p>New agreements mean that UK Driving Licence holders will only need International Driving Permits when entering <u>SOME EU countries</u>. At 10 June UK licence holder <u>with photo licences</u> WILL need IDP's to drive in <u>Bulgaria, Croatia, Cyprus, the Czech Republic, France, Italy, Malta, the Netherlands, Romania, Slovakia and Sweden</u>. 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:- https://www.gov.uk/guidance/international-driving-permits-for-uk-drivers-from-28-march-2019 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. Click on link in notes for post office info.</p>	<p>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. Anyone using the post office system highlighted here needs to note that the Post Office system has not been updated with the exemptions at the time of writing. https://www.postoffice.co.uk/international-driving-permit</p>
<p>Employer Toolkit (EU Settlement Scheme)</p>	<p>Now</p>	<p>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.</p>	<p>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</p>
<p>Import/Export Declaration Data (Exporters and Importers)</p>	<p>Now</p>	<p>Exporters and Importers will be responsible for ensuring customs declarations are made. They need to decide how and who will submit daclarations to customs.</p>	<p>This is CRITICAL - Traders need to be preparing for using customs codes for their commodities and ensure that paperwork is of sufficient standard for processing customs.</p>

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. We tested this and 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 a number www.ec.europa.eu/taxation_customs/dds2/eos/eori_validation.jsp?Lang=en To apply for EORI visit https://www.gov.uk/eori
Common Transit Convention	Now	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 - https://www.gov.uk/government/publications/uk-trade-tariff-community-and-common-transit-outwards/uk-trade-tariff-community-and-common-transit-outwards We are expecting further information from HMRC on potential locations for "Offices of Transit" that will be needed to make any systems work.
TIR	Now	TIR will available for transport between the UK and the EU. The RHA will provide further information for members in July or 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	July	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	July	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 :- https://www.gov.uk/guidance/international-driving-permits-for-uk-drivers-from-28-march-2019
Drivers - UK Passport holders	July	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)	July	All operators (EU and UK) will be responsible for making Safety and Security declarations unless using Common Transit Processes.	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)	August	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.
EU EORI Numbers	August	Operators will also require an EU EORI number to undertake haulage between the EU and the UK for EU Safety & Security Declarations unless using Common Transit.	<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>
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.
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.
Medicines - Government ferry capacity for Category 1 goods	Wait	The current capacity is no longer required. No new alternative is in place.	
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	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.

Vans	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.
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
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.
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.
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