

# Brexit - No Deal Checklist from the RHA

07 February 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.**



More Information: [www.rha.uk.net](http://www.rha.uk.net)

Issue	When	Action	Notes
Register for Government Updates	<b>Now</b>	hauliers can register to receive updates from the various dept eg DVSA, HMRC	<a href="https://www.gov.uk/help/update-email-notifications">https://www.gov.uk/help/update-email-notifications</a>
<b>Government Guidance</b>	<b>Now</b>	<b>A co-ordination page for importers / exporters and operators is available. Ensure importers and exporters know this link as it is starting to flesh out the obligations traders and operators will have to fulfil in the event of a no deal.</b>	<a href="https://www.gov.uk/guidance/importing-exporting-and-transporting-products-or-goods-after-brexit?utm_source=0471a3f0-4d0f-4668-ae15-ff83ece803c9&amp;utm_medium=email&amp;utm_campaign=govuk-notifications&amp;utm_content=daily">https://www.gov.uk/guidance/importing-exporting-and-transporting-products-or-goods-after-brexit?utm_source=0471a3f0-4d0f-4668-ae15-ff83ece803c9&amp;utm_medium=email&amp;utm_campaign=govuk-notifications&amp;utm_content=daily</a>
International Permits (ECMT Annual) 2019 only	<b>Watch</b>	Application process has closed. Initial allocation to be announced. <b>THERE IS A POSSIBILITY THAT THE APPLICATION PROCESS MAY REOPEN - IF THIS HAPPENS THE PERIOD WILL BE VERY SHORT.</b>	Allocation of permits is expected on 7th or 8th February. <b>Alternatives to ECMT permits may become available for UK &lt;&gt; EU movements. If the UK and EU agree an alternative many ECMT permits may not be needed by operators and could be recycled to those needing transit or cross-trade.</b>
International Permits (ECMT Monthly) 2019 only	<b>Watch</b>	Application process has closed. Initial allocation to be announced. <b>THERE IS A POSSIBILITY THAT THE APPLICATION PROCESS MAY REOPEN</b>	Allocation of monthly permits may happen after the annual permits are distributed. The monthly permits will be given to operators who have been unsuccessful in obtaining annual permits.
Transit Permits (for movements between the UK and non-EU States where road haulage across the EU is needed). 2019 only.	<b>Watch</b>	ECMT Application process has closed. Initial allocation to be announced. <b>THERE IS A POSSIBILITY THAT THE APPLICATION PROCESS MAY REOPEN</b>	It may be the case that ECMT permits will be required for movements between the UK and non-EU States.

<b>Cross Trade (carriage of international between 2 EU States). 2019 only.</b>	<b>Watch</b>	ECMT Application process has closed. Initial allocation to be announced. <b>THERE IS A POSSIBILITY THAT THE APPLICATION PROCESS MAY REOPEN</b>	ECMT permits allow limited cross-trade. Operators need to follow developments with alternative proposals in coming days and weeks.
CMR Notes	<b>Now</b>	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 <a href="https://www.gov.uk/guidance/moving-goods-by-road">https://www.gov.uk/guidance/moving-goods-by-road</a> CMR notes can be obtained from the RHA Shop <a href="http://www.rhaonline.co.uk/shop.php">http://www.rhaonline.co.uk/shop.php</a>
EORI - UK (Economic Operator Registration and Identification number)	<b>Now</b>	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 if it becomes applicable.	Check here to establish if you have a number <a href="http://www.ec.europa.eu/taxation_customs/dds2/eos/eori_validation.jsp?Lang=en">www.ec.europa.eu/taxation_customs/dds2/eos/eori_validation.jsp?Lang=en</a> To apply for one visit <a href="https://www.gov.uk/eori">https://www.gov.uk/eori</a>
Employer Toolkit (EU Settlement Scheme)	<b>Now</b>	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.	<a href="https://www.gov.uk/government/publications/eu-settlement-scheme-employer-toolkit?utm_source=7057ffdc-5bae-4f45-8db1-a4b98b87fc26&amp;utm_medium=email&amp;utm_campaign=govuk-notifications&amp;utm_content=daily">https://www.gov.uk/government/publications/eu-settlement-scheme-employer-toolkit?utm_source=7057ffdc-5bae-4f45-8db1-a4b98b87fc26&amp;utm_medium=email&amp;utm_campaign=govuk-notifications&amp;utm_content=daily</a>
Import/Export Declarations (Exporters and Importers)	<b>Now</b>	<b>Exporters and Importer</b> need to be preparing for using customs codes for their commodities and ensure that paperwork such as invoicing is of sufficient standard for processing in customs.	Exporters and Importers should consider how they plan to do customs declarations after Brexit (using an agent?). They will need to obtain EORI numbers too from HMRC. Review the link on the Government Guidance entry above.
<b>Drivers - UK Passport holders</b>	<b>Now</b>	All drivers should check and make sure there is 6 months validity on passports from March 2019	<b>Given the limited time until a potential no deal - it is recommended that drivers act now to avoid potential backlog in late March.</b>

<b>Driving Licences (Lorries) in the EU</b>	<b>Now</b>	International Driving Permits will be needed by drivers holding UK licences for most of EU.	<b>2 permits are available. 1 yr for Ireland, Spain, Malta &amp; Cyprus, 3 yr - all other EU countries, plus Norway &amp; Switzerland. Depending on which countries drivers go to, many drivers will need both permit types. These can be obtained from selected Post Offices. More information at: <a href="https://www.postoffice.co.uk/international-driving-permit">https://www.postoffice.co.uk/international-driving-permit</a></b>
Common Transit Convention	<b>Now</b>	This has been agreed by the UK & EU States. It allows inland clearance at authorised facilities.	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.
<b>UK Transport Manager CPC - working in the EU</b>	<b>Now</b>	<b>For those working in the EU, routine recognition of UK held CPC qualifications will end.</b>	<b>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.</b>
<b>Driver CPC - UK drivers working for EU operators</b>	<b>Now</b>	<b>For those working in the EU, routine recognition of UK held CPC qualifications will end.</b>	<b>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.</b>
EU Transport Manager CPC in the UK	OK	UK recognising EU qualifications	
Driver CPC - for drivers working for UK operators	OK	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.
<b>ECMT Certificates of Conformity</b>	<b>Feb-19</b>	<b>Operators who obtain ECMT permits will need to obtain certificates of conformity for the vehicles they will be using.</b>	<b>An ECMT 'certificate of compliance' must be in a vehicle, these confirm the vehicle meets the Euro VI standard and the trailer meets the technical safety requirements. More information will be given to those who obtain permits.</b>
<b>Trailer Registration</b>	<b>Feb-19</b>	<b>Applications now expected to open in February 2019.</b>	<b>3 months late for the application process to open.</b>

International REMOVAL Permits (ECMT Annual)	<b>Feb-19</b>	ECMT available permit for REMOVALS ONLY	The system is in place - removal companies will be able to use ECMT removal permits post Brexit. No action needed until Jan 19.
<b>EORI - EU</b>	<b>Feb-19</b>	Operators will also require an EU EORI number to undertake haulage between the EU and the UK for Safety & Security Declaration.	<b>HMRC to advise when / how this should be done. Until then UK operators should take no action. EU operators will need to obtain a UK EORI number</b>
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.
<b>Cabotage in the EU for UK operators</b>	Wait	Not likely to be possible	The Commission proposes to ban all UK operators from undertaking cabotage in the EU. <b>The RHA will advise if this changes</b>
<b>Cabotage in the UK for EU operators</b>	Wait	Not likely to be possible - or heavily restricted	<b>The UK Government has indicated it is willing to consider allowing Cabotage if the EU allows UK operators to cabotage in the EU.</b>
Trailer Permits	Wait	Unknown if trailers moving separately from the tractor unit in the EU will require any form of permit.	RHA investigating
<b>Import into UK Safety &amp; Security Declaration</b>	Wait	<b>All operators (EU and UK) will be responsible for making Safety and Security declarations for each consignment on a vehicle. (This will apply to vans too, not just lorries)</b>	<b>HMRC to advise details of this complex and onerous task. New legislation confirms that fines will be upto £1,000 per failed S&amp;S Declaration. When known the the RHA will alert the sector about what will need to be done, how and when.</b>
<b>Export from UK Safety &amp; Security Declaration</b>	Wait	<b>This declaration is combined with the exporters export customs declaration. Operators will need to ensure this has been done by the exporter or their agent.</b>	<b>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.</b>
<b>EU side Safety &amp; Security declarations</b>	Wait	<b>All operators (EU and UK) will be responsible for making or ensuring that Safety and Security declarations for each consignment on a vehicle. (This will apply to vans too, not just lorries)</b>	<b>Further information will be provided when known.</b>

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.
Restricted Operator Licences in the EU	Wait	To be clarified	Will update when known.
<b>Vans</b>	Wait	<b>National Standards are expected to apply across the EU.</b>	<b>It appears international haulage in vans will be come difficult in some EU States for UK operators. Each State will have different rules. Information will be made available when known.</b>
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	
<b>Fuel - cross border limits</b>	Wait	<b>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</b>	<b>More information will be obtained and shared as known.</b>
TIR	Wait	To be clarified	
Fines	Wait	To be clarified	
Tolls	Wait	To be clarified	
Euro rating evidence	Wait	To be clarified	
<b>Vehicle Insurance</b>	<b>Watch</b>	<b>Green cards likely to be needed</b>	<b>Watch for further advice</b>
<b>Number Plates &amp; National Identifiers</b>	<b>Watch</b>	<b>You may need a GB sticker even if your vehicle has a Euro-plate (a number plate displaying both the EU flag and a GB sign).</b>	<b>You will not need a GB sticker to drive outside the UK if you replace a Euro-plate with a number plate that features the GB sign without the EU flag.</b>
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](mailto:h.wallace@rha.uk.net)*