

# Brexit - No Deal Checklist from the RHA

04 January 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 until at least January 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>International Permits (ECMT Annual)</b>	<b>Now</b>	Operators who wish to continue to do international must apply for ECMT <b>before the 18 January. Applications can be made via <a href="https://www.gov.uk/guidance/ecmt-international-road-haulage-permits">https://www.gov.uk/guidance/ecmt-international-road-haulage-permits</a></b> (It has been confirmed by DfT that if you will intend to replace non-Euro VI lorries with Euro VI you can apply as a Euro VI).	In late <b>December DfT changed the deadline for applications to 18 January.</b> The European Commission published a draft legal proposal that IF PASSED INTO LAW will allow UK operators to carry goods between the EU and the UK without an ECMT permit. <b>This is not law yet, and the RHA recommends that operators apply for ECMT permits.</b>
<b>International Permits (ECMT Monthly)</b>	<b>Now</b>	Operators who wish to continue to do international using monthly ECMT must now first apply for ECMT annual permits. <b>Applications must be made by the 18 January.</b>	<b>DfT have advised that there will be no separate application process for monthly ECMT permits.</b>
<b>Transit Permits (for movements between the UK and non-EU States where road haulage across the EU is needed).</b>	<b>Now</b>	There are no transit permits to apply for at this time. If needed apply for ECMT permits	<b>Further information will be provided when known.</b>

<b>Cross Trade (carriage of international between 2 EU States)</b>	<b>Now</b>	<b>Is allowed with restrictions using ECMT permits. If you undertake cross-trade you need to apply for ECMT permits</b>	
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.
<b>Drivers - UK Passport holders</b>	<b>Now</b>	<b>All drivers should check and make sure there is 6 months validity on passports from March 2019</b>	
Trailer Registration	<b>Jan-19</b>	Applications now expected to open in January 2019.	All UK trailers working internationally (except Ireland) will require registration before 28 March 2019. <b>There has been no announcement yet.</b>

Driving Licences (Lorries) in the EU	Jan-19	International Driving Permits will be needed by drivers holding UK licences.	2 permits will be available, depending on which countries drivers go to. Some drivers will need both permit types. More information should have been provided in December <b>(but there had been no update as yet)</b> - the Government plan to introduce improved processes.
Common Transit Convention	Jan-19	This has been agreed by the UK & EU States. It may allow 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.
International REMOVAL Permits (ECMT Annual)	Feb-19	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.
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 - this will not be until 2019 at least.
Cabotage in the EU for UK operators	Wait	Not likely to be possible	The Commission proposes to ban all UK operators from undertaking cabotage in the EU.
Cabotage in the UK for EU operators	Wait	Not likely to be possible - or heavily restricted	
Trailer Permits	Wait	Unknown if trailers moving separately from the tractor unit in the EU will require any form of permit.	RHA investigating
EORI - EU	Wait	Operators will also require an EU EORI number to undertake haulage between the EU and the UK for Safety & Security Declaration.	HMRC to advise when / how this should be done. Until then UK operators should take no action.
Import Safety & Security Declaration	Wait	All operators (EU and UK) will be responsible for making Safety and Security declarations.	HMRC to advise details of this complex and onerous task. When known the the RHA will alert the sector about what will need to be done, how and when.

Export Safety & Security Declaration	Wait	All operators (EU and UK) will be responsible for making Safety and Security declarations.	HMRC to advise details of this complex and onerous task. When known the the RHA will alert the sector about what will need to be done, how and when. EU member States requirements unclear
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.
Vans	Wait	To be clarified	Will update when known.
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
UK Transport Manager CPC - working in the EU	Wait	For those working in the EU, recognition of UK held CPC qualifications will end.	EU States may chose to continue to recognise UK issued CPCs, but this cannot be guaranteed. Further clarity to be provided when known
Driver CPC - UK drivers working for EU operators	Wait	For those working in the EU, recognition of UK held CPC qualifications will end.	EU States may chose to continue to recognise UK issued CPCs, but this cannot be guaranteed. Further clarity to be provided when known
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	
TIR	Wait	To be clarified	
Fines	Wait	To be clarified	
Tolls	Wait	To be clarified	
Euro rating evidence	Wait	To be clarified	
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>Further topics will added in updates</b>			

***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)***