

Brexit - No Deal Checklist from the RHA

14 December 2018

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

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 (ECMT Annual)	Now	Operators who wish to continue to do international must ensure they are on DVSA VOL system so they can apply for ECMT	Operators who intend to apply should review what information will be needed to make an application. Applications opened on 26 November and close on 21 December 2018 . Review RHA Guidance via web site above.
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 if 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 https://www.gov.uk/eori - to apply for one

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 Importer 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.
International Permits (ECMT Monthly)	Early '19	Applications open in February 2019. Operators must ensure they are on DVSA VOL system	
International REMOVAL Permits (ECMT Annual)	Jan-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.
Trailer Registration	Jan-19	Applications now expected to open in January 2019 .	All UK trailers working internationally (except Ireland) will require registration before 28 March 2019.
Drivers - UK Passport holders	Jan-19	In January 2019 all drivers should check and make sure there is 6 months validity on passports from March 2019	
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 will be provided in December (at time of publishing there had been no update) - the Government plan to introduce improved processes.

Comon Transit Convention	Jan-19	This is being negotiated by the UK & EU States. If agreed it may result in some simplified processes for groupage operations where inland clearance might be possible	If agreed, detailed guidance from HMRC will be needed.
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.
Transit Permits	Wait	No information is available if transit permits will be needed when using bilateral permits	
Cross Trade (carriage of international between 2 EU States)	Wait	Is allowed with restrictions using ECMT permits. No further information possible until bilateral permits become available.	
Cabotage in the EU for UK operators	Wait	Not likely to be possible	
Cabotage in the UK for EU operators	Wait	Not likely to be possible	There may be special circumstances where cabotage might be allowed for restricted period and certain goods only.
Trailer Permits	Wait	Unknown if trailers moving seperately 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	EU recognition of UK held CPC qualifications will cease	EU States may chose to continue to recognise UK issued CPCs in practice, but this cannot be guaranteed. Further clarity to be provided when known
Driver CPC - UK drivers working for EU operators	Wait	Automatic recognition by EU countries of UK issued qualifications will cease.	EU States may chose to continue to recognise UK issued CPCs in practice, 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.
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