



**BPDG / British Embassies in Southern Europe - 03.11.2021**

**Customs**

**1. How can an EU haulier have a GB EORI if it is not a GB company?**

You do not need to be a GB established company to apply for a GB EORI. Please find information including how to apply here [gov.uk/eori](https://www.gov.uk/eori)

**2. If you use a courier service for shipments, does the import declaration still need to be submitted through CHIEF?**

This depends entirely on the nature of the courier services - parcel operators will normally submit bulk customs declarations in which circumstances a second declaration is not required.

**3. For hazardous waste exports for further treatment, is there any difference or a special procedure?**

Further information on the import and export of waste can be found at [gov.uk/guidance/importing-and-exporting-waste](https://www.gov.uk/guidance/importing-and-exporting-waste)

**4. When the goods are exported from Portugal to GB, and FR is the country of exit, we need to do an Export Declaration in Portugal, and then it needs a Transit declaration in France, correct?**

Not necessarily. If you are using the Common Transit Convention to move your goods, then you will need to complete a transit declaration. If you are exporting goods from Portugal to GB without using the transit procedure, then you do not need a separate declaration at the French border. You will, however, need to specify on your export declaration that France is the office of exit from the EU.

**Pre-lodgement / GVMS**

**5. Does the pre-lodgment have to be created by the UK side or by the EU side?**

The pre-lodgement is done in UK customs systems. It can be done by the UK Importer or a UK agent. Please find more information here about pre-lodgement [gov.uk/guidance/moving-goods-to-and-from-the-eu-through-roll-on-roll-off-locations-including-eurotunnel](https://www.gov.uk/guidance/moving-goods-to-and-from-the-eu-through-roll-on-roll-off-locations-including-eurotunnel)

**6. Is GVMS needed for both the GB importer & EU exporter (in cases where we export goods to the UK)?**

If you are a haulier moving the goods to the UK then you will need access to GVMS. You need to register to create the goods movement reference for the journey. You can find out more here [gov.uk/guidance/register-for-the-goods-vehicle-movement-service](https://www.gov.uk/guidance/register-for-the-goods-vehicle-movement-service)  
GVMS is only required on EU - GB routes. GVMS does require action to be taken before goods leave the EU i.e declarations are needed for the GMR (Goods Movement Reference) but this is needed to facilitate the import into GB.



**7. If the haulier hires a Community Service Provider that secures the GVMS system, does he no longer need to register for this service and does he not need the GB-EORI either?**

The haulier will still need to apply for access to GVMS so that detail can be updated. The haulier should also register for a GB EORI number as they may need to interact with other GB systems such as S&S GB, CHIEF etc. You do not need to be a GB established company to apply for a GB EORI. Please find information including how to apply here [gov.uk/eori](https://www.gov.uk/eori)

**8. What is the difference between GMR and GVMS? Are both always needed after 01/01/2022?**

GMR is the Goods Movement Reference used on the Goods Vehicle Movement Service (GVMS) IT platform. The GMR is the actual goods reference created using the GVMS service. GVMS will be used for imports and exports from 2022 but is not required for all movements [gov.uk/guidance/register-for-the-goods-vehicle-movement-service](https://www.gov.uk/guidance/register-for-the-goods-vehicle-movement-service)

**9. The haulier does not have to complete SSD (safety and security declarations) until 1st July 2022 but must register for and use GVMS on 1st January?**

Even if you do not need to use GVMS yet you should still register for GVMS as soon as possible to be ready for the new requirements by 1 January 2022.

**10. Please can you advise how hauliers will communicate the UCN numbers when exporting goods ?**

Please refer to the following guidance which refers to providing the UCN: [gov.uk/guidance/transporting-goods-between-great-britain-and-the-eu-by-ro-ro-freight-guidance-for-hauliers](https://www.gov.uk/guidance/transporting-goods-between-great-britain-and-the-eu-by-ro-ro-freight-guidance-for-hauliers)

**Transit**

**11. Is it required to create a GMR if goods are under a transit declaration?**

Goods moving under Common Transit from the EU to GB will need a GMR in order to fulfil the office of transit function.

**12. Will ENS or EXS summaries be required for ATA Carnet movements using short straits?**

For imports into GB an ENS is required. [gov.uk/guidance/check-if-you-need-to-make-an-entry-summary-declaration](https://www.gov.uk/guidance/check-if-you-need-to-make-an-entry-summary-declaration)<https://www.gov.uk/guidance/check-if-you-need-to-make-an-entry-summary-declaration>, for exports from GB with an ATA Carnet an EXS is not required [gov.uk/guidance/find-out-when-to-make-an-exit-summary-declaration](https://www.gov.uk/guidance/find-out-when-to-make-an-exit-summary-declaration)



## Rules of Origin

### **13. Do GB companies need to register on the REX system or will their EORI be enough to prove preferential origin?**

GB entities do not need to register with REX; that is for EU entities only. The GB importer will need a statement of origin from the EU exporter, or, use their own 'origin knowledge'.

### **14. At the moment EU exporters are sending goods using their EU EORI number as the statement of origin. When will REX registration be mandatory to import EU goods as preferential goods?**

The use of the REX number is not a specific GB requirement, EU exporters should consult the customs authority in their individual EU member states to ensure compliance and consistency.

### **15. Concerning goods that are exported from the European Union into the UK : if goods value is over 6000 EUR and if goods are duty free according to the UK Tariff Schedule, is it still needed that the invoice has the Exporter REX number?**

It is a commercial decision whether or not to claim preferential origin if there is a zero GB tariff. The REX number will not be needed if not making any preferential origin claim on the GB import declaration.

### **16. Can you please be more specific about when a Supplier Declaration is needed from 1st January 2022?**

To find information on when and where to include a suppliers declaration please visit [gov.uk/guidance/using-a-suppliers-declaration-to-support-a-proof-of-origin](https://www.gov.uk/guidance/using-a-suppliers-declaration-to-support-a-proof-of-origin)

### **17. Will a certificate of origin issued by the producer be accepted (importing minerals from EU to GB) or is it mandatory to have a certificate issued by an official government authority?**

Under the GB/EU Trade and Cooperation Agreement (TCA) the exporter makes a statement of origin on their commercial document. A certificate is not required from the official authorities.

## SPS goods

### **18. What is the definition for HRFNAO?**

High Risk Foods Not of Animal Origin -

[food.gov.uk/business-guidance/high-risk-food-of-non-animal-origin](https://www.food.gov.uk/business-guidance/high-risk-food-of-non-animal-origin)

### **19. Are HRFNAO the products under Reg 2019/1793?**

Not all HRFNAO are in 2019/1793, there are other products that are listed in other legislation due to specific issues.



**20. Where can you access a definition and list of 'regulated' plants please?**

[planthealthportal.defra.gov.uk/eu-exit-guidance/imports/list-of-goods-that-will-be-regulated-from-1-january-2022/](https://planthealthportal.defra.gov.uk/eu-exit-guidance/imports/list-of-goods-that-will-be-regulated-from-1-january-2022/)

**21. What about honey and beekeeping products or products made from honey**

They are POAO and subject to certification accordingly if they are intended for human consumption.

There are specific additional provisions for products containing less than 50% honey - [gov.uk/guidance/import-or-move-composite-products-from-the-eu-and-northern-ireland-to-great-britain](https://gov.uk/guidance/import-or-move-composite-products-from-the-eu-and-northern-ireland-to-great-britain)

**22. One question concerning labelling and marking of table olives, will we have to change labels applied on the glass jars/plastic kegs/bags? We want to export organic table olives, you stated that a certificate of inspection is needed, please clarify**

For table olives in bulk packs intended for sale to caterers or for retail sale, changes will come into force from 31 September 2022. The pack will need to display the name and address of the food business operator in the British Islands (i.e. UK plus Crown Dependencies) or, if the FBO is not established within the British Islands, the name and address of the importer into the UK. Food placed onto the GB market before this time may continue with an EU address and such food can be sold through after 31/9/22 until stocks are exhausted.

Organic products imported from the EU to Great Britain will not require a certificate of inspection (COI) until 1 July 2022. However, the 'EU exporter' must be certified by a control body that is approved to operate in its territory and the 'GB importer' must be certified by a UK control body.

Organic products imported into GB from the EU must meet the requirements of the UK-EU Trade and Cooperation Agreement (TCA) – "Annex 14 Organic Products".

From 1 July 2022, the EU exporters control body will be required to approve the GB COI before the organic products leave the country of export and the GB Port will require to endorse the COI when the organic products reach GB.

We have produced a step-by-step guide to assist businesses and control bodies to complete the GB COI correctly and this guidance will be shared with the COI template in due course.

The COI can be signed electronically and sent to the receiving port as a PDF document.

**IPAFFS and pre-notification**

**23. Will IPAFFS be used for prenotification of plants as well?**

If traders are currently using PEACH, they should continue to use PEACH until they are notified to move over to IPAFFs. New trader will use IPAFFS for Plants imports into GB from January 22.



**24. Should pre-notification for regulated plants be done by IPAFFS and also by PEACH? Should Phytosanitary Certificates be attached to PEACH pre-notification?**

If traders are already using PEACH they should continue to use this system to pre-notify until directed to transition to IPAFFS. Phytosanitary Certificates will be required from July 22 for all regulated products. High Priority Plants (the requirements that came in from Jan 2021 this year) will continue to be checked at Place of Destination until July 22, and require prenotification and PCs as they do now.

**25. In groupage deliveries of goods of animal origin, at the time the official veterinarian issues the health certificate, it is impossible to know the details of the means of transport that will cross the border with the UK (in most cases, this will not have been defined, yet). How can HC be correctly filled? Should the details referring to the means of transport be left blank?**

No - never leave fields on a certificate blank. Options are to enter correct details - always if possible, If not required for the specific circumstances then the space or box may be closed by drawing a line in the box. However, specifically for means of transport, the container or vehicle identity should be entered. If this should change for a vehicle by the time the goods cross the border, the importer or exporter's agent may communicate with the BCP via IPAFFS and must upload the correct details at this stage as part of the pre-notification. A new certificate will not be required. Further advice may be provided on this situation in the future. Check with the BCP at the point of entry what they will expect or may allow.

**26. If a product has origin a country outside EU but it is exported from EU into UK, is the issuance of the health certificate by the MS obligatory or the consignment can be accompanied by the Health certificate from the country of origin?**

That would depend on whether it is an EU Transit or not. If it is imported into the EU then it needs an EU certificate to be exported again from EU to UK.

Note: clarify that it would need an export health certificate issued in the EU country of despatch for goods going to UK (not an EU import certificate) and it would be based on the UK import model certificate required for those goods.

**27. For Products of Animal Origin, if there is a percentage of animal product - egg, for example, in mayonnaise, do we have to pre-notify the product and get an Export Health Certificate? Is this considered a Product of Animal Origin?**

Yes, the product contains eggs, which are a POAO. However, mayonnaise is considered a composite product but mayonnaise with less than 50% pasteurised egg content is exempt from veterinary checks and therefore from pre-notification for veterinary (SPS) checks.

Please make sure you read and understand composite products requirements:

[gov.uk/guidance/import-or-move-composite-products-from-the-eu-and-northern-ireland-to-gr-eat-britain](https://www.gov.uk/guidance/import-or-move-composite-products-from-the-eu-and-northern-ireland-to-gr-eat-britain)



## **Infrastructure**

### **28. Are there gonna be special Control Points for perishable Products of Animal Origin with short shelf life (i.e. milk, fish)? Aiming to reduce time in control of consignments:**

No control points will be specially designated for products with short shelf life. However, document checks are going to be completed in advance and remotely from BCPs and only some vehicles will be routed for checks to BCPs, many will be allowed to travel on directly to their destination without stopping at BCPs.

### **29. Are there plans to open BCP's to service Tees/Humber/Forth ports?**

The current list of BCPs can be found here -

[gov.uk/government/publications/uk-border-control-posts-animal-and-animal-product-imports](https://www.gov.uk/government/publications/uk-border-control-posts-animal-and-animal-product-imports)

This list will continue to be updated.

## **UKCA Marking**

### **30. The UCA marking refers to what products?**

A variety of goods require UKCA marking to demonstrate conformity for the GB market. Manufacturers will need to check product specific legislation to see if their goods require UKCA marking. More info can be found here;

[gov.uk/guidance/using-the-ukca-marking#check-whether-you-need-to-use-the-new-ukca-marking](https://www.gov.uk/guidance/using-the-ukca-marking#check-whether-you-need-to-use-the-new-ukca-marking)

### **31. What does the CA part of UKCA stand for please?**

Conformity Assessed

### **32. Do I need a UKCA marking on raw cable for further processing?**

If the product is subject to CE marking then it will also require UKCA marking, but in the first instance you should check the product specific legislation.

### **33. What are the timelines for UKCA marking and medical devices?**

CE marking will continue to be recognised in Great Britain for medical devices until 30 June 2023. More information can be found via the following;

[gov.uk/guidance/regulating-medical-devices-in-the-uk](https://www.gov.uk/guidance/regulating-medical-devices-in-the-uk)

## **Single Trade Window**

### **Is there an ongoing user group for the UK STW?**

We very much value trader input as a critical part of the successful delivery of the Single Trade Window, and are in the early stages of developing industry focus groups to inform the service design. If you would like to become involved in the future, please contact

[bpdg.enquiries@cabinetoffice.gov.uk](mailto:bpdg.enquiries@cabinetoffice.gov.uk)