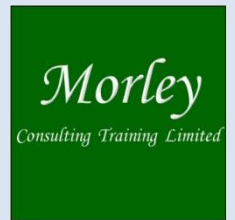


The Impact of BREXIT on Importers and Exporters



The 'Trade' part of the HMRC Joint Customs Consultative Committee (JCCC) is made up of around 20 members representing diverse trade sectors. Members have already begun the positive process of putting forward views on how BREXIT can be made to work for business. As should be expected members have differing views regarding what will benefit their individual organisations after the UK leaves the EU. However, there is general agreement around some high level requirements:

- No change to existing practices, processes and authorisations and no insistence on system changes until the new arrangements are clear and agreed.
- It is important to have sight of the long term view of HMRC and to understand what arrangements will apply in the meantime.
- What is important about the trade deal that is negotiated with the remaining 27 member states of the EU is that the infrastructure and systems must be in place for it to work from day one after leaving and that the deal should be as cost neutral to trade as possible.
- Trade facilitation should be a vital component of Government planning and Brexit negotiations.
- The reintroduction of customs declaration requirements and frontier controls between the UK and the EU could potentially cause major disruption at the border, particularly, at the UK's ferry/Ro-Ro ports and for trade using the Channel Tunnel.
- Now is an excellent opportunity to take a look at what we do and improve it dramatically to meet both the regulators' and trade needs.
- There needs to be a UK legal basis for trade to work with, creating an opportunity for legislative changes to be incorporated into a comprehensive UK Trade Legal Guide initially endorsing the UCC, incorporating it into British law and then changing elements of it that are unsuitable.
- Some examples of areas within the UCC that have been identified for reconsideration are:
 - Guarantees for potential debt to be removed.
 - Bill of discharge for End Use to be removed.
 - IP Authorisation by Declaration to be permitted significantly more than 3 times per annum to help small traders.
 - Self-Assessment / Traders entry in the Records to be brought in ASAP for all businesses holding AEOC
 - Continue with voluntary AEO registration scheme to facilitate reciprocity.
 - First Sale principal to be re-instated.
 - The definition of 'Exporter' will need to be agreed.
- Any (re)authorisations that are driven solely by UCC legislation where there is no obvious benefit to UK business should be stopped and an extended transitional period allowed.
- A UK AEO would need to be created.

- A UK version of the EORI scheme may still be required.
- Export controls, embargoes, sanctions and common security measures will need to be discussed; UGEAs will no longer be available to UK companies.

If you would like to be part of the conversation get in touch with your trade organisation e.g. Chartered Institute of Logistics and Transport and ensure your thoughts and comments are passed to your representative on the JCCC. The current composition of the JCCC can be seen at <https://www.gov.uk/government/groups/joint-customs-consultative-committee>

Need help? Contact us:

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