



What to expect on day one of a no deal scenario: Businesses trading in civil explosives [▲]

Currently anyone importing civil explosives into the EU, or transferring them through the EU, requires an approval from the EU country where the transfer ends. This is called an Intra Community Transfer approval and each EU country through which the civil explosives transfer must also add their authorisation for the transfer to the Intra Community Transfer.

Civil explosives manufactured in, or imported to, the EU must be marked with a unique site code provided by an EU country to the manufacturer or EU-based importer. This code is recognised by all EU countries. An accompanying record must be held to enable traceability of the civil explosives through the supply chain.

How processes will change

If the UK leaves the EU without an exit deal, we will not be an EU country for the purposes of transfers of civil explosives through the EU internal market, so will not be able to issue an Intra Community Transfer.

This means that if you transfer (import) civil explosives to the UK you will need a standalone approval from a UK competent authority (Great Britain or Northern Ireland depending on where the transfer ends in the UK) before the civil explosives are imported. Intra Community Transfer approvals issued by UK competent authorities prior to exit for multiple transfers will continue to be recognised until they expire.

The UK will recognise existing site codes on civil explosive products imported to the UK where the site code has been issued by another EU country. The UK will not require you as an importer to add a new code. However, to continue effective traceability through the supply chain, you will need to contact a UK competent authority (Great Britain or Northern Ireland depending on the place of import) to notify them of any existing site code on the civil explosives being imported. The competent authority will then link this existing code to you as the UK-based importer.

The UK government will continue to work with the Northern Ireland Civil Service to ensure that a coherent civil explosives regime continues to operate across the UK.

What this means for your business

If you have previously obtained an Intra Community Transfer approval from a UK competent authority (Great Britain or Northern Ireland depending on where the transfer ended) for a transfer across the EU internal market, you will now need to obtain an Intra Community Transfer from the final EU country where the transfer ends.

You will then need a new UK approval for the transfer (now import) to the UK from the relevant UK competent authority (Great Britain or Northern Ireland depending on where the transfer ends in the UK). If you import civil explosives into the UK, you will need to contact the relevant UK competent authority (Great Britain or Northern Ireland depending on where the civil explosives are imported to) to provide them with details of any existing site code on the civil explosive product.

Making importing easier from the EU

HMRC is introducing new [Transitional Simplified Procedures \(TSP\)](#), to make importing through roll-on, roll-off ports and the Channel Tunnel easier for the initial period after the UK leaves the EU, should there be no deal. We anticipate TSP will remain in place until traders are ready to use rest of the world processes and permanent arrangements are in place, which will take at least a year.

Sign up for HMRC's new [Transitional Simplified Procedures \(TSP\)](#), online from 7 February, to make importing easier for you until at least April 2020.

Once you are registered for TSP you will be able to:

- transport most goods into the UK without having to make a full customs declaration at the port
- postpone paying your customs duties.

However, for controlled goods, such as animal products and most plants, or excise goods like alcohol or tobacco, you will have to provide some customs information before import.

We have published further [guidance on TSP](#) on GOV.UK, including the locations TSP applies to.

Actions you should take now

1. Plan to put in place internal processes for your business to ensure compliance.
2. Read the UK government's technical notice on [Trading goods regulated under the 'New Approach' in the event of a no deal scenario](#).
3. Read the UK government's technical notice on [exporting controlled goods](#)
4. Sign up for [Transitional Simplified Procedures \(TSP\)](#), online from 7 February, if it's suitable for your business but you should note that:
 - you will need to use your EORI number to register
 - if you are importing controlled goods such as animal products and most plants, or excise goods like alcohol or tobacco, you will have to provide some customs information before you import
 - read further guidance on [TSP](#) on GOV.UK, including the locations TSP applies to.
5. Stay up-to-date with these changes by [registering for email alerts](#). Follow the link, add your email address, select 'Submit', select 'Add subscription' and choose 'EU Exit' then select 'Submit'.