



What to expect on day one of a no deal scenario: Ferry or Channel Tunnel operators moving goods between the UK and the EU[▲]

The trade that you carry out with the EU will broadly follow the customs controls that apply for the rest of the world. So you will need to adapt your business to comply with these new systems, processes and controls.

If you're a ferry or Channel Tunnel operator moving goods between the UK and the EU, the following will apply.

How the customs process will change

In a no deal scenario, you will be treated in the same way as operators transporting goods to and from the rest of the world, with the same filing requirements and consignments being subjected to the same scrutiny.

HMRC wants to ensure that traders have access to the right authorisations ahead of 29 March to ensure trade can keep flowing. We will be publishing further information specifically for importers, exporters, carriers, and port operators who trade with the EU through roll-on, roll-off locations. This will include new and temporary easements to support continued trade fluidity at these locations.

For accompanied roll-on, roll-off transport, the requirement is on the haulage company to file safety and security declarations for imports – but you must confirm with your customers that they've made the right customs declarations. You can do this through the terms and conditions that your customers use when booking their transport. You will need to show the booking as evidence to HMRC if we ask for it.

Goods that are accompanied: For goods that are accompanied (for example, where a haulier is used), the liability to submit an Entry Summary Declaration (also known as the Safety and Security Declaration) lies with the haulier in advance of the goods leaving the EU. There is no obligation for the ferry or Channel Tunnel operator to confirm that this declaration has been submitted.

Goods that are unaccompanied: Where goods are unaccompanied, for example goods on trailers or in containers, you as the ferry or Channel Tunnel operator are responsible for submitting the Entry Summary Declaration within the same time limits as accompanied goods. You must include the trailer or container number on the declaration.

You will need to file the Entry Summary Declaration for inbound goods to the UK online on the Import Control System. The filing deadline for roll-on, roll-off traffic is currently two hours before arrival.

You can find more information on what needs to be provided on an Entry Summary Declaration, and how they are submitted, on the [GOV.UK Starting to import or Exporting goods outside the EU](#) pages, as well as the guidance [Moving goods to and from the EU through roll-on and roll-off locations including Eurotunnel](#).

Transit of non-EU goods within the EU

The [Common Transit Convention](#) facilitates cross-border movements of goods between contracting parties to the Convention, by enabling any charges due on those goods to be paid only in their country of destination.

The UK is currently party to the CTC by virtue of its membership of the EU. Following a successful negotiation, the UK will remain in the CTC after the UK leaves the EU.

As well as retaining its benefits for current users, this will also help trade move freely to and from the UK after leaving the EU. It will provide cash flow benefits to traders and aid trade flow at key points of entry into the UK and exports, as traders will only have to make customs declarations and pay import duties when they arrive at their final destination.

Dealing with import VAT

If the UK leaves the EU without a deal, the government will introduce postponed accounting for import VAT on goods brought into the UK. This means that UK VAT registered businesses importing goods to the UK will be able to declare and recover import VAT on the same VAT return, subject to normal tax rules, rather than paying import VAT when the goods arrive at the UK border. You will need to provide your VAT registration number on your customs declaration.

This will apply to imports from the EU and non-EU countries.

To reach this decision, the government took into account the views of businesses and sought to mitigate any adverse cash-flow impacts and ensure that VAT processes are kept as close as possible to what they are now. To ensure equity of treatment, in a no deal scenario, businesses will be able to account for their import VAT from non-EU countries in the same way, which will help to make the most of trading opportunities around the world.

We'll issue more guidance setting out further detail on accounting and record-keeping requirements soon.

Changes to VAT IT systems

EU VIES VAT Number Validation: This service allows businesses to check whether a customer or supplier's VAT number is valid. You will still be able to use VIES to check the validity of EU business VAT registration numbers. UK VAT registration numbers will no longer be part of this service after 29 March. A UK-only online VAT number checker will be available on GOV.UK from 29 March. We know this is important for certain businesses, to carry out due diligence.

Actions you should take now

1. Consider any changes you may need to make if you have to follow the same or similar processes to carry goods between the UK and the EU as you do with the rest of the world.
2. Assess the impact of an increased demand for safety and security and customs declarations on your business, and consider recruiting and training additional staff.
3. The passport rules for travel to most countries in Europe will change if the UK leaves the EU on 29 March 2019 without a deal. Read the government's guidance on [Travelling to the EU with a UK passport if there's no Brexit deal](#) and, if relevant, ensure your employees and customers are aware of the potential changes.
4. 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'.