



Q & A from Brexit – ‘Where now?’ webinar held on 11th June 2020

Q: Will the regulations in Seamus’ presentation for goods moving through ports apply to goods moved by post / couriers / air?

A: It Depends. It can be determined and comes down to the value of the consignment. It will come into effect from Jan 2021. What is at risk and what is not at risk needs to be decided by the Joint Committee. Worst case scenario is that everything is seen at risk and the NI consumer could become the importer in some circumstances for e.g.

Q: We hear about unfettered access for NI business and the requirements for an exit declaration for NI goods going to GB. Is there is a requirement for pre lodgement declarations and if so is there a list available? Does this refer to SPS etc

A: Nothing has been made public yet. Exit declarations will likely be put in place as it would be too problem some if not and would be for goods originating in NI travelling to the EU to continue under rules of transit. There would be a big impact however for companies working on all- Ireland/island basis.

Q: Is there a clear definition of "at risk" products.? Any insight into tariff recovery process?

A: No definition yet. At worst case scenario everything is at risk and at best case nothing would be at risk for NI. The technical detail is much needed on how that would work and what schemes would be put in place i.e trusted trader / AEO etc. The EU is very clear that they must protect the EU single market.

Q: Rules of destination. What tariff risks are there for NI business?

A: There is no formal guidance on this rule. It may become more important during the next stage of negotiations. The area is on the agenda for the specialised committee tomorrow. The added value part is very specialised in the food sector but where it stands on tariffs depends on where the product is going to be used.



Q: While FTA will be positive from a duty cost perspective, do they believe companies, especially in the manufacturing sector, understand the type of work that will be required if an FTA is implemented? Normally under an FTA not all goods crossing between the signatories to the FTA would qualify just because of where they are shipping from and to. Only products that meet the rules of origin can avail of reduced duty rates, and this needs to be proven by the companies involved in the transaction.

A: A Free Trade Agreement is good however it comes with compliance responsibilities. It can be hugely useful but it is only part of the jigsaw. Other compliance areas still need to take place for e.g. SPS checks / veterinary & health checks etc and these can be quite costly and resource intensive to adhere to.

Q: Is there a modelling on the anticipated additional indirect costs (of checks/customs) for the different FTA/Agreement scenarios for hauliers/logistics firms?

A: Business organisations have each completed some cost modelling on their industry. A European Health cert for example costs @£200 and when you add that with other costs it works out @£230 per product plus consignment costs. It all depends on what you are exporting but there is no doubt that companies, particular the bigger ones will need new software to run paperwork and the Man hours required just to administer paperwork for GB-NI goods can be enormous.

Q: What about wholesalers delivering to retailers in the ROI?

A: Presuming wholesaler takes goods from GB to NI warehouse then sells onto ROI, we would anticipate that they pay the tariffs on such consignments then claim percentage rebate by showing what was then sold onto ROI from that consignment.