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Moving Goods between the UK and Northern Ireland post Brexit

EORI NUMBERS

From 1 January 2021 all traders sending goods to Northern Ireland will need an EORI number that starts with XI to:

- move goods between Northern Ireland and non-EU countries.
- make a declaration in Northern Ireland.
- get a customs decision in Northern Ireland.

To get an EORI number that starts with XI, the trader must already have an EORI number that starts with GB. If they do not have one, they need to apply for an EORI Number that starts with GB as soon as possible.

If the trader already has an EORI number that starts with GB and HMRC believes that they need one that starts with XI, they will automatically send one in mid-December 2020.

To obtain advice on moving goods between Great Britain and Northern Ireland, the trader should sign up for the Trader Support Service (TSS). If the business signs up before 23 November, this will also ensure that the trader will be sent an EORI starting with XI.

From 1 January 2021 the trader will need an EORI number that starts with GB to move goods between the UK and other countries.

It is advisable to check the EORI number and ensure that it starts with GB.

UK to Northern Ireland: One Customs Territory

As the Protocol makes clear, and the Government set out in the HMRC Command Paper concerning the UK's approach to the Northern Ireland Protocol, there will be some changes for goods movements into Northern Ireland from Great Britain. The UK as a whole will leave the EU's customs union and Northern Ireland will remain unequivocally part of the UK's customs territory.

That means:

- no new Customs infrastructure required to be built in Northern Ireland (or in Great Britain ports facing Northern Ireland)
- no export or exit declarations for goods leaving Great Britain for Northern Ireland
- processes will be fully digital and eligible to be facilitated by the Trader Support Service
- the regime will be administered by UK authorities - meaning a minimal proportion of checks only as required by the levels of risk
- the UK Government position remains that there should be no tariffs payable on all internal UK trade, and in any case, full use will be made of waivers and reimbursements to minimise the impact on business in any scenario.
- an end-to-end Trader Support Service available at no costs to all businesses who wish to use it

UK to Northern Ireland: digital declarations

The Protocol entails some new administrative processes for traders, notably new digital import declaration requirements, and digital safety and security information, for goods entering Northern Ireland from the rest of the UK. These processes, which will be administered by UK authorities in the form of HMRC and Border Force, are needed to make sure that tariffs are not paid on trade within the UK, that Northern Ireland can benefit from UK FTAs, and that goods destined for Ireland and the EU (i.e. at a genuine and substantial risk of doing so) pay tariffs when they should.

The UK Government has stated that there should be no tariffs on internal UK trade; and that in any case, full use will be made of waivers and reimbursements to minimise the impact on business in any scenario. The Protocol requires a UK-EU Joint Committee decision on the application of tariffs on 'at risk' goods moving into Northern Ireland. Full details will be provided subsequent to that decision; but for these purposes, it is important to note that the ultimate destination of goods and whether, for example, traders will be selling them in Northern Ireland or moving them on to Ireland/the EU, will become relevant in the future.

These digital processes will be streamlined and simplified to the maximum extent, and will not require any export declaration, exit declaration, or customs and regulatory clearance for goods as they leave the rest of the UK for Northern Ireland. Furthermore, the new **Trader Support Service** will ensure that the process is straightforward even for businesses who have not previously engaged with customs, and that no direct costs are incurred.

UK to Northern Ireland: Trader Support Service

The UK Government will establish a new, free service, the **Trader Support Service (TSS)**, which will record electronic information on goods movements so that traders do not have to engage with new digital customs systems or processes. This service will deal with formalities (such as import declarations and safety and security information) on behalf of traders, providing unprecedented support for Northern Ireland business.

Initially traders will be able to register with the service and receive support and guidance on what the Protocol means for them. This will include the steps they need to take to comply with them (including getting an Economic Operators Registration and Identification (EORI) number). Traders will also be supported to understand the information they will need to collect about their goods, including their description, value and any supporting documentation required.

The service will then use this information to complete import and safety and security declarations on behalf of traders. Where a trader uses the TSS to complete these they will not need to access HMRC systems, such as CDS or ICS, themselves.

UK to Northern Ireland: Other requirements

Economic Operators Registration and Identification (EORI) number

An EORI number is required for all businesses who need to manage customs operations with HMRC. VAT registered businesses with EU trade were previously enrolled with an EORI number, so should check whether they already have a number before applying.

Tariffs

The UK Government has been clear that there should be no tariffs on internal UK trade; and that in any case, full use will be made of waivers and reimbursements to minimise the impact on business in any scenario. The Protocol sets out that there must be a UK-EU Joint Committee decision on the application of tariffs to 'at risk' goods moving into Northern Ireland, and that decision will inform the final regime that applies. Full details will therefore be provided subsequent to that decision.

Simplifications and facilitations

Where Customs procedures apply there are a number of facilitations available that will make processes smoother for traders choosing not to use the Trader Support Service, including simplified declarations for import and authorised economic operators.

Businesses can use Customs Special Procedures to suspend, reduce or claim relief on the payment of Customs duties and VAT under specified conditions. Special procedures include customs warehousing, inward processing, outward processing, temporary admission and authorised end use.

It is recognised that this system of facilitations will need to take account of the regime that will apply for the application of tariffs to 'at risk' goods moving from Great Britain to Northern Ireland. As such, further guidance may be provided following the UK-EU Joint Committee decision in that regard.

VAT and Excise

The Protocol means that Northern Ireland maintains alignment on some administrative processes included within the EU VAT and excise rules for goods. Northern Ireland is, and will remain, part of the UK's VAT and excise system, reflecting the fact that each jurisdiction across Europe already operates separate VAT and excise regimes. HMRC will continue to be responsible for the operation and collection of the revenues, which will not be passed on to the EU. The Protocol notes that implementation will take into account Northern Ireland's integral place in the UK's internal market. The Government is confident that we can use the flexibilities available, in the context of the wider commitments to Northern Ireland's place in the UK internal market, to implement these aspects of the Protocol in a way which minimises new costs and burdens on businesses in Northern Ireland. As this is subject to ongoing consultation and discussion, further guidance will be set out on the application of VAT and excise rules for goods in Northern Ireland in due course.

Transit

The UK has successfully negotiated membership of the Common Transit Convention after the end of the transition period. Common Transit allows the movement of goods under duty suspension until they reach their final destination. Traders will only have to make customs declarations and pay import duties on arrival at their final destination. Safety and security requirements will still need to be met.

The use of transit can provide benefits for traders in particular for movements that cross multiple territories, such as those movements which use the UK as a landbridge to move between continental Europe and the island of Ireland. Movement Guarantees will be required for these movements, given the use of the Community Transit Convention for these movements. Recognising the importance of that route for goods movements, specific discussions are ongoing as to the transit requirements for that trade.

There will be the use of the Common/Community Transit Convention System (NCTS), and this will require the use of a Movement Guarantee for all carriers. In addition, a hard copy of the Transit Accompanying Document (TAD) along with the Movement Reference Number (MRN) on the TAD. The guarantee for the movement will be discharged at the point of import of the consignment.

Hauliers/Carriers

The precise requirements for hauliers at locations will depend on the model used by locations through which goods are moved. Two options will be available, namely:

- A pre-lodgement model; or
- A temporary storage model.

Locations will be able to choose which model to operate depending on their circumstances. The UK Government will provide details specific requirements for traders, hauliers, carriers and port operators in due course. But there will be no change regarding the road haulage legislation or permit regimes which apply.

Carrier Responsibilities

Pre-Clearance

For traffic between the UK and Northern Ireland, Entry Summary Declarations for cargo pre-clearance will be required. Cargo pre-clearance will be required AT LEAST 2 hours before the trailer is loaded aboard the ferry. This also means that the carrier will also require access to the Brussels Import Clearance System (ICS).

UK Safety and Security Declarations will be required for imports from the EU as from 1 July 2021.

The pre-clearance declaration is made by the carrier, and the Goods Movement Reference Number (MRN) is provided to the agent/exporter and is then transferred to the Goods Vehicle Movement System (GVMS).

All Customs Declarations for goods moving from the UK to Northern Ireland must be pre-lodged and acknowledged by the Customs computer prior to loading of the trailer aboard ferry. These declarations must also contain the MRN in the appropriate box on the Entry.

Where the term DDP (Delivered Duty Paid) is used, the Seller (Exporter) must make the import declaration for the arrival of the goods in Northern Ireland. INCOTERMS such as FCA, DAP or DDP, will be required for all shipments between the UK and Northern Ireland and vice versa.

The Goods Vehicle Movement System (GVMS) will also be required, and it is due to become live at 11 pm UK time on 31 December 2020. The system is not mandatory at this stage but will be offered to the commercial sector. However, the appropriate computer software will be required for its use.

Because of the use of GVMS and the Movement Reference Number provided from the Entry Summary Declaration, a Transit Accompanying Document (TAD) must travel with the goods, along with the necessary commercial and transport documentation.

A Goods Movement Reference (GMR) must be completed before the movement of the consignment to the port of loading. This must be presented to the ferry operator/carrier prior to loading aboard vessel. The GMR will comprise an alphanumeric identifier, and it must also have the correct Vehicle Registration Number (VRN). GMRs can only be used for single crossings and must be applied for individually for every individual crossing between the UK and Northern Ireland.

Records

EIDR Import and Export Transaction records in Excel format will be required to be maintained and kept by all traders. For all cross-border shipments between Northern Ireland and the Republic of Ireland, INTRASTAT records and monthly Supplementary Declarations will continue to be used, as will conventionally VAT Numbers in invoices for all cross-border transactions.

There will be no need for any new procedures for the movement of goods between Northern Ireland and the UK mainland, other than for goods moving in transit across the UK bound for the European continent. There will therefore be no Customs checks or documentation required for these movements to the UK. However, Customs Declarations will be required at the point of UK import for movements from the Republic of Ireland to the UK via Northern Ireland. These can be submitted either in Northern Ireland or on the UK mainland.

UK to Northern Ireland: Sanitary and Phytosanitary (SPS) goods

There will be new requirements on sanitary and phytosanitary (SPS) goods moving from Great Britain to Northern Ireland. These requirements will uphold the longstanding status of the island of Ireland as a single epidemiological unit and will build on the existing checks on live animal movements arriving in Northern Ireland from Great Britain.

The Protocol obliges both the UK and EU to seek to streamline trade between Great Britain and Northern Ireland, and to avoid controls at Northern Ireland ports as far as possible. In line with that obligation, discussions are ongoing about the process by which controls are conducted, and their frequency. This guidance will be updated to take account of those discussions.

Specifically, the UK Government recognises the unique position of authorised traders, such as supermarkets, with stable supply chains, and comprehensive oversight of warehousing and distribution operations, moving pre-packaged products for retail sale solely in Northern Ireland. We are continuing to pursue specific solutions for this trade, and this guidance does not therefore apply to this trade.

The UK Government will also be engaging with businesses and other stakeholders on further Government support that could be provided to address the new requirements on sanitary and phytosanitary (SPS) goods moving from Great Britain to Northern Ireland. Further information on any support will be provided in the light of that engagement.

SPS goods: common requirements

There will be a series of common requirements that will apply to typical movements of agri-food products from Great Britain to Northern Ireland from 1 January 2021 (subject to the outcome of discussions about the process and frequency of controls). These are as follows:

- **Entry via a designated point of entry** - agri-food goods subject to controls will have to enter Northern Ireland via designated points of entry. The Government has submitted its designation applications to the EU and further information will be provided on specific port/airport designations once that application process has concluded. Designations will take into account existing patterns of movement and current commercial ferry routes.
- **Pre-notifications** - many agri-food movements will need to be pre-notified on [IPAFFS](#), an online system developed by the Government for processing movements of SPS goods. Further guidance will be provided. This will be a simple online notification procedure and is designed to support traceability of goods.
- **Health Certification (such as Export Health Certificates (EHCs) and Phytosanitary Certificates** - Export Health Certificates will be required for movements of animal products and live animals, and phytosanitary certificates will be required for movements of plants and plant products. The Government has introduced a new digital online application service, EHC Online (EHCO) to streamline the process.

SPS goods: specific products

Further requirements may also apply to movements of specific goods - many of which are already in place today, recognising the status of the island of Ireland as a single epidemiological unit. Further detail is provided on the following pages on:

- live animals
- animal products
- fish, shellfish and their products
- plants and plant products
- other agri-food requirements

UK to Northern Ireland: Sanitary and Phytosanitary (SPS) goods - Live Animals

Live animals being moved from Great Britain to Northern Ireland already undergo checks upon arrival in Northern Ireland. This is to ensure that the island of Ireland remains disease-free and respects its longstanding existing status as a single epidemiological unit.

Building on these existing processes, from 31 December 2020, those live animals subject to controls as stipulated in the relevant legislation, including cattle, sheep, pigs and poultry, that are moved from Great Britain to Northern Ireland will need to:

- be pre-notified via IPAFFS in advance of arrival.
- enter Northern Ireland via a designated point of entry.
- be accompanied by an Export Health Certificate

At the point of entry, all goods will be subject to documentary, ID checks and physical checks.

Businesses must follow welfare in transport rules when moving live animals. In particular, all journeys over eight hours will also need to be accompanied by a journey log.

An import licence from the Northern Ireland Department for Agriculture, Environment and Rural Affairs (DAERA) may be required, as is the case at present.

To obtain the appropriate EHC, the exporter will need to apply on EHC Online (EHCO). EHCO is a new digital online application service for EHCs that has been developed by Defra and APHA and will have replaced the current manual PDF process for applying for EHCs by the end of the transition period. The EHC will need to be completed and signed by an appropriately qualified Official Veterinarian (OV).

Additional requirements for specific purposes are:

UK to Northern Ireland: sanitary and phytosanitary (SPS) goods - animal products

All Products of Animal Origin (POAO), Germinal Products and those Animal By-Products (ABP) subject to SPS checks as set out in the relevant legislation will need to:

- be pre-notified via IPAFFS in advance of arrival.
- enter Northern Ireland via a designated point of entry.
- be accompanied by an Export Health Certificate

At the point of entry, all goods will be subject to documentary and ID checks and a small proportion of goods will be subject to physical checks.

To obtain the appropriate EHC, the exporter will need to apply on EHC Online (EHCO). EHCO is a new digital online application service for EHCs that has been developed by Defra and APHA and will have replaced the current manual PDF process for applying for EHCs by the end of the transition period. The EHC will need to be completed and signed by an appropriately qualified certifying officer. For products of animal origin (excluding fish) this is usually an Official Veterinarian (OV).

Products of Animal Origin (POAO)

Establishments moving POAO from Great Britain to Northern Ireland will additionally need to be approved in line with food hygiene regulations, either by the relevant local authority or by the Food Standards Agency (or Food Standards Scotland) depending on the nature of the production they are undertaking. These establishments will also need to be listed by the EU.

Animal by-products and derived products not intended for human consumption (ABP)

Establishments moving ABP from Great Britain to Northern Ireland must be on APHA's approved ABP List, unless they are nationally authorised (only possible for non-harmonised exports).

The establishment of destination in NI must also be approved or registered by DAERA and be listed on the EU ABP establishment list for NI.

ABPs may also require an import licence from the Northern Ireland Department of Agriculture, Environment and Rural Affairs (DAERA).

Most ABPs will require an EHC or declaration; for non-harmonised exports (where an EHC or declaration is not available) a DAERA authorisation will be required. Some certificates may require an official seal.

UK to Northern Ireland: Sanitary and Phytosanitary (SPS) goods - fish, shellfish and their products.

Northern Ireland registered vessels

There will be no new SPS requirements for UK-flagged vessels with their port of registration in Northern Ireland ('NI-registered vessels') when landing fishery products into Northern Ireland or EU ports. This will be the case regardless of the location from which those products are caught.

This means that NI-registered vessels will not be required to land at designated ports in the EU or in Northern Ireland for SPS purposes and no Captain's Certificate will be required for the landing of processed products from food approved vessels. Additionally, these vessels, if food-approved vessels, do not have to be listed by the EU as third country vessels approved for exports.

Other aspects of the treatment of NI-registered vessels, and in particular their exemptions from duties in line with the decision to be reached by the UK-EU Joint Committee, are subject to ongoing discussions between the UK and EU. Further guidance will be provided subsequent to their conclusion.

Movements of fish, shellfish and their products from Great Britain to Northern Ireland (excluding direct landings)

All fish, shellfish and their products being moved from Great Britain to Northern Ireland will need to:

- be pre-notified via IPAFFS in advance of arrival.
- enter Northern Ireland via a designated point of entry.
- be accompanied by an Export Health Certificate
- be accompanied by catch certificates (if applicable to the species being transported) for each consignment.

Export Health Certificates will need to be completed and signed by an appropriately qualified certifying officer. For fishery products, this can be a non-veterinary certifying officer, such as a food competent local authority Environmental Health Officer (EHO).

At the point of entry, all goods will be subject to documentary and ID checks and a small proportion of goods will be subject to physical checks.

While not SPS-specific, catch certificates are official documents that prove any marine-caught fish has been caught legally. These are issued by the Marine Management Organisation (MMO) and will need to be applied for and secured by the GB-based party. Traders can create a catch certificate online. Catch certificates checks will be conducted on a risk-led basis.

Goods will also need to be accompanied by a processing statement/storage document where applicable.

As with all movements of animal products, establishments will need to be approved in line with food hygiene regulations, either by the relevant local authority or by the Food Standards Agency (or Food Standards Scotland) depending on the nature of the production they are undertaking. These establishments will also need to be listed by the EU.

Live bivalve molluscs

In certain circumstances, live bivalve molluscs (LBM) will be deemed as products of animal origin for human consumption and follow the procedures set out here, as opposed to those for the movement of live animals.

8.4 Direct landings by GB-registered vessels into NI ports

Direct landings of fresh fishery products (or fish that has undergone primary production such as de-heading) by UK-flagged vessels with their port of registration in England, Wales or Scotland into ports in Northern Ireland will need to:

- land into a port designated in line with illegal, unreported and unregulated (IUU) fishing regulations.
- submit a prior notification form four hours in advance of landing.
- submit a landing declaration (and transshipment declaration if applicable) four hours in advance of landing (or the transshipment taking place)
- send a complete and validated catch certificate to the competent authority in Northern Ireland (if applicable to the species of fish being landed)

Live bivalve molluscs cannot be directly landed in this manner.

Direct landings (either the vessel or the catch) may be subject to risk-based checks at the designated port into which they land.

There is a separate process for freezer, factory or reefer vessels landing fish that has undergone secondary processing (e.g. freezing or wrapping). These vessels will need to enter via a designated point of entry in line with SPS regulations and provide a Captain's Certificate. To sign the certificate, the captain must have been authorised by the Animal and Plant Health Agency. The vessels will need to be approved in line with food hygiene regulations by the relevant local authority and listed by the EU.

8.5 The Convention on International Trade in Endangered Species (CITES)

Access guidance on endangered species subject to CITES requirements – such as caviar from the Sturgeon family or some live aquarium fish - below.

UK to Northern Ireland: sanitary and phytosanitary (SPS) goods - plants and plant products

All plants and plant products moved from Great Britain to Northern Ireland will need to:

- be pre-notified by the NI importer via IPAFFS in advance of arrival
- enter Northern Ireland via an appropriate point of entry
- be accompanied by a phytosanitary certificate (PC)

The GB operator intending to move regulated plants and plant products to NI, will need to secure a phytosanitary certificate prior to the goods departing GB with sufficient time to allow for inspections and any testing which may be required. A phytosanitary certificate is

an official document that certifies that the material has been inspected, is considered free from quarantine and other pests, and that it conforms to the plant health regulations of the place of destination.

In order to obtain a phytosanitary certificate, the operator will need to apply to the relevant plant health authority: The Animal and Plant Health Agency in England and Wales; the Scottish Government in Scotland; and for wood, wood products and bark only, the Forestry Commission in England, Wales and Scotland.

Physical inspections for the sake of securing a phytosanitary certificate can take place inland, prior to movement to NI.

Fruit and vegetables that have been processed, such as packaged salad, may not be subject to plant health control depending on the degree of processing. A selection of fruits (pineapple, coconut, durian, bananas and dates) are already exempt from specific phytosanitary controls, and do not therefore need to be accompanied by a phytosanitary certificate. These products will continue to not be subject to any phytosanitary requirements.

For movements of regulated plants and plant products, the GB operator will need to have registered with the appropriate plant health authority in GB to obtain a phytosanitary certificate. For England and Wales this will be through the EHC Online (EHCO) system, further information will be available shortly for Scotland.

Timber

Businesses moving timber from Great Britain to Northern Ireland must meet the requirements for timber as set out in applicable NI legislation (which will continue to be the same framework as in place today).

Plant Protection Products (PPPs)/Pesticides

If produce being moved from Great Britain to Northern Ireland has been treated by PPPs, the produce must meet the Maximum Residue Levels (MRLs) set out in the legislation made applicable in NI for each product-PPP combination.

UK to Northern Ireland - sanitary and phytosanitary (SPS) goods - other agri-food requirements

High-risk food and feed not of animal origin (HRFNAO)

HRFNAO must be accompanied by a health certificate issued by the country of origin where relevant, and a certificate of laboratory analysis signed by the relevant Competent Authority. Goods must be pre-notified on IPAFFS as is the case for other agri-food

movements. All goods will be subject to documentary checks, and a percentage will be subject to ID and physical checks.

Organics

Organic goods moving from Great Britain to Northern Ireland must meet the regulatory requirements that apply to Northern Ireland under the Protocol. Further guidance may be provided in due course to take account of discussions between the UK and the EU.

Marketing Standards

Products moving from Great Britain to Northern Ireland must continue to meet the regulatory requirements for the relevant marketing standards that apply to Northern Ireland under the Protocol. Existing marketing standards cover: fruit and vegetables, hops, wine, beef and veal, eggs, hatching eggs and chicks, poultry meat, spreadable fats and olive oil. Further updates will include additional detail on the specific processes that apply to movements to Northern Ireland.

Natural Mineral Waters

Further requirements may also be required for movements of natural mineral waters.

Food labelling requirements

Guidance on this can be found at the website [GOV.UK](https://www.gov.uk).

UK to Northern Ireland: manufactured goods

Placing Manufactured Goods on the market in Northern Ireland

At the end of the transition period, the effect of the Protocol is to maintain the existing requirements for placing manufactured goods on the market in Northern Ireland. Northern Ireland will align with all relevant EU rules relating to the placing on the market of manufactured goods. This means that, where a business already holds the relevant approvals that goods meet EU rules, and will continue to produce goods to those rules, this will continue to provide the basis for placing goods on the market in Northern Ireland.

There will however be new requirements for goods to be able to be placed on the market in the EU, including with respect to how approvals are sought. These requirements may necessitate changes for businesses, and the implications are considered in the guidance on the following pages.

Separate guidance for Northern Ireland businesses placing manufactured goods on the rest of the UK market is available in section one. In short, Northern Ireland businesses will have unfettered access to the whole of the UK market, without the need for additional approvals.

This means that Northern Ireland businesses, for goods which meet the relevant standards and have the relevant approvals for harmonised goods, will have full access to both the UK market and free access to EU markets without the need to produce two separate sets of requirements or hold two sets of approvals. This is a unique arrangement available only to Northern Ireland businesses in recognition of the unique circumstances of Northern Ireland.

11.5 Legal responsibilities

Manufacturers

Legal obligations will remain largely unchanged, including responsibility for compliance activities. Goods will need to continue to be manufactured to relevant rules in order to be placed on the Northern Ireland market. Such harmonised goods can generally also be placed on the EU market. If your goods require any mandatory third-party conformity assessment and this is undertaken by a UK body, the UK(NI) mark will need to be applied. Check the UK(NI) mark guidance, which will be published shortly, to find out what you need to do. Goods with the UKCA mark, or an EU conformity mark such as the CE mark accompanied by the UK(NI) mark, cannot be placed on the EU market. National rules (non-harmonised) goods will no longer automatically benefit from the EU mutual recognition principle for placing on the EU market.

Northern Ireland-based distributors and suppliers

The trader will need to confirm whether they or their supplier will take on the role of 'importer' described in the relevant rules after the end of the transition period. They will become an importer if they are the company bringing goods into Northern Ireland from either Great Britain or another non-EEA country and placing them on the Northern Ireland market, including if they are bringing them from somewhere else in the UK.

If the trader is an importer, they will need to make sure:

- goods are labelled with the details of the importer (or importer's authorised representative) who must be based in Northern Ireland, the EU or the EEA. These details include the company's name, or registered trademark, and a contact address or registered trademark.
- the correct conformity assessment procedures have been carried out and that goods have the correct conformity markings.
- the manufacturer has drawn up the correct technical documentation and complied with the labelling requirements.
- you maintain a copy of the declaration of conformity for a period of 10 years.
- goods conform with the relevant essential requirements.

If the trader is a fulfilment service provider, they may need to fulfil new compliance responsibilities from 16 July 2021.

Authorised representatives or responsible person

The rules for certain goods require the appointment of a named individual who has responsibility for safety. These roles have different names under rules for different types of goods. Authorised representatives and responsible persons can continue to be based in Northern Ireland, the EU or the EEA for placing goods on the Northern Ireland market. If you currently use a responsible person based in Great Britain, then the Northern Ireland or EU 'importer' of goods manufactured outside of Northern Ireland or the EU becomes the responsible person under EU law.

Authorised representatives, who can undertake specified tasks on behalf of the manufacturer, must be based in Northern Ireland or the EU after the transition period and must be appointed by the manufacturer, by written mandate.

From 16 July 2021, in most sectors an authorised representative must be appointed for certain compliance responsibilities where there is not a Northern Ireland or EU based manufacturer, importer or fulfilment service provider in the supply chain who fulfils these. Different rules apply to cosmetics and medical devices, on which guidance will follow soon.

Importing into Northern Ireland from non-EU/EEA countries

If the trader is placing goods on the Northern Ireland market from outside the UK or EU/EEA, they can self-declare that these goods meet relevant rules and apply the relevant EU conformity mark, usually the CE mark. If the goods require third-party conformity assessment, they can have their goods assessed:

- by an EU or EEA notified body, requiring the relevant EU conformity mark, usually the CE mark.
- against EU requirements, by a UK-recognised conformity assessment body, requiring the relevant EU conformity mark, usually the CE mark and UK(NI) marking
- against EU requirements by using an EU recognised conformity assessment body, listed on NANDO and based in Australia, New Zealand, Canada, USA, Japan, Switzerland, Turkey, South Korea or Israel (for the sectors covered by the relevant mutual recognition agreement)

UK to Northern Ireland: highly specialised goods or goods subject to specific international obligations

For some highly specialised goods, or for goods falling within the very limited number of procedures relating to specific international obligations binding on the UK and the EU, there will be further requirements for registrations or authorisations through relevant systems to be placed on the Northern Ireland market, as set out below.

Chemicals

Businesses seeking to export chemicals to Northern Ireland at or above 1 tonne per year will need to ensure that the importer in Northern Ireland or the EU holds a registration under EU REACH or appoint an Only Representative in Northern Ireland or the EU as registrant for the substance. Registration is a requirement on industry (manufacturers/importers) to collect and collate specified sets of information on the properties of those substances they manufacture or supply at or above 1 tonne per year. This information is used to perform an assessment of the hazards and risks that a substance may pose and how those risks can be managed.

This information, and its assessment, is submitted to the European Chemicals Agency (ECHA) in Helsinki. ECHA has also provided advice for companies on the implications of the UK's withdrawal from the EU.

Plant Protection Products (PPPs)/Pesticides

PPPs must be authorised in Northern Ireland in order to be moved from the UK to Northern Ireland. The Health and Safety Executive (HSE) is responsible for issuing authorisations. All existing PPP authorisations will remain valid in Northern Ireland following the end of the transition period.

Fluorinated Gases - HFCs

Any business moving HFCs (the main type of fluorinated gas) from the UK into Northern Ireland will need to be registered on the EU Hydrofluorocarbon (HFC) Registry and have sufficient quota allocated or authorisations to cover the quantities moved. Movements have to be notified online.

Ozone Depleting Substances (ODS)

Any business moving ODS from the UK to Northern Ireland will need to be registered on the EU ODS Licensing System and have sufficient quota to cover the quantities moved. For feedstock, lab or process agents, an EU import licence will be required. The GB-based exporter will require an export licence from the Environment Agency.

Medical devices

Devices will need to be compliant with the EU Medical Devices Regulation (MDR) from May 2021 and In Vitro Medical Devices Regulation (IVDR) from May 2022. The device must be registered in Eudamed (for MDR-compliant products) and be registered with the MHRA. If the manufacturer is based in the UK, the manufacturer will be required to have an Authorised Representative in NI or the EU.

Tobacco and e-cigarette products

These products will have to comply with the EU Tobacco Products Directive and packaging will need to feature the EU picture library.

To be sold in Northern Ireland, a notification will need to be made. Discussions with the EU are still on going on how this process will take place and further guidance will follow.

International trade in endangered species of wild fauna and flora (CITES)

The Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) will be implemented through the EU Wildlife Trade Regulations (EUWTR) in Northern Ireland and the UK Wildlife Trade Regulations (UKWTR) in Great Britain. Movements of endangered species from GB to NI will need to meet entry/exit requirements as stipulated in these regulations.

Species covered are listed under one of four Annexes to the Wildlife Trade Regulations. The controls applying to a particular species are dictated by the Annex in which the species is listed.

Most listed specimens will need to be accompanied by a valid CITES document.

You will need to import, or export CITES specimens through a CITES-designated Point of Entry/Exit (PoE).

Species listed under CITES may also be subject to SPS controls, such as those applying to live animals or plants and plant products.

12.8 Drugs Precursors

Import and export licenses will be required for Category 1 drug precursors chemicals. Licences will be required for every shipment. Importers and exporters must register for a National Drugs Control System (NDS) account to apply for the licenses. A Pre-Export Notification may need to be sent to the EU for Category 1 precursors being shipped from the UK to Northern Ireland. This may require up to 15 days for the relevant authority to consider the notification.

12.9 Waste

Green (non-notifiable) waste being moved from the UK to Northern Ireland will need to be transported by an authorised haulier.

Amber (notifiable) waste being moved from Great Britain to Northern Ireland will need to be transported by an authorised haulier and be accompanied by a handler licence. A notification must be submitted to the relevant competent authority in Great Britain, and prior informed consent (PIC) is required to undertake the movement.

12.10 Chemicals subject to the PIC Regulation

Companies wishing to move chemicals subject to the PIC Regulation from the UK to Northern Ireland will need to notify HSE, the Designated National Authority (DNA) for the UK, at least 35 days before they intend to ship any listed chemical, whether by itself or in a

mixture, for the first time in any calendar year. For those chemicals for which explicit consent is additionally required, the DNA will seek this on the company's behalf. Further information can be found on HSE's website.

12.11 Persistent Organic Pollutants (POPs)

Prior Informed Consent (PIC) will be required for movements of POPs from Great Britain to Northern Ireland.

12.12 Mercury

The movement of commodity (elemental) mercury from Great Britain to Northern Ireland will require the consent of the relevant competent authority. The movement between Great Britain and Northern Ireland of certain products containing mercury listed in the relevant legislation made applicable in NI will be prohibited. Mercury waste being moved from Great Britain to Northern Ireland will require consent from the regulators before the waste can be moved. A notification form must be submitted to the relevant competent authority in Great Britain in advance of the planned waste movement.

12.13 Other goods

Guidance will be set out in due course for cosmetics, fertilisers, medicines, veterinary medicines and a number of additional medical products and radioisotopes, and for relevant transport products (as required).