

ARE YOU READY FOR →BREXIT?

Last updated: 01.09.2021

Following the transitional period, the United Kingdom (UK) has officially left the European Customs Union on January 1, 2021. This checklist is intended to help you as a Swiss exporter to check whether you and your shipments are prepared for the changes.

Origin

As of September 1, 2021, the revised rules list of the PEM Convention according to Annexes 1 and 2 in [Protocol No. 3 will apply](#).

Semi-finished goods from the EU and Turkey as well as other contracting parties to the PEM Convention (provided that Switzerland and the UK have concluded a free trade agreement) may be accumulated. This is provided that the origin has been confirmed based on rules of origin identical to those of the CH-UK agreement. Information regarding accumulation possibilities can be found [here](#).

- Check whether your goods comply with the current rules list and whether any semi-finished goods may be accumulated.**



Goods which are in transit at the time of the provisional application of the new rules of origin (September 1, 2021) will continue to be considered as preferential goods. In these cases, until August 31, 2023 (deadline of two years), it will be possible to submit a proof of origin that was issued after the date of the provisional application of the new rules of origin, as well as documents proving compliance with the transport regulations.

For most products, the CE marking will be accepted until January 1, 2023.

EU customs clearance

From January 1, 2021, the UK will no longer be part of the EU single market, which is why exports to the UK can no longer be processed via EU customs clearance.

- Check whether the procedures for exports to the UK need to be adapted.**



Shipments to Northern Ireland can still be cleared through EU customs as Northern Ireland will remain part of the EU Single Market.

UKCA / CE marking

After the end of the transitional period, the CE conformity marking will be replaced in the UK by the UKCA. For most products, the CE marking will continue to be accepted until January 1, 2022 and for medical devices until January 1, 2023.

- Check whether your CE marking is still accepted during the [transitional periods](#).**



For goods placed on the UK market before January 1, 2021, there is no need to replace the CE marking.

UK REACH

After the end of the transitional period, the EU REACH registration will no longer apply for sales of chemicals to the UK (with the exception of Northern Ireland). It will be replaced by UK REACH. Depending on the quantity and hazard profile of the substances, registration must be completed within 2, 4 or 6 years.

- Check with the UK importer whether UK REACH registration has already been completed or which transition periods you can benefit from.**



UK importers are obliged to ensure registration on import. For this purpose, a "Downstream User Import Notification (DUIN)" must be applied for from the competent authority, after which registration must take place.

Deliveries from the EU

Deliveries from your warehouses in the EU to the UK can no longer be handled as intra-Community deliveries. You will have to export from the EU and then import into the UK.

- Check whether you can export from the EU and whether you meet the requirements for a customs approved exporter ([EU domicile](#))**



Goods of Swiss origin that have been definitively imported into the EU and that are stored there, will lose their preferential origin as of January 1, 2021, in accordance with the CH-UK trade agreement. However, if unprocessed goods are returned to Switzerland, and then re-exported from there to the UK, they will still enjoy preferential status. Goods stored in a bonded warehouse in the EU, however, will retain their stated origin, and can be shipped directly to the UK.



The EU-UK agreement does not provide for a movement certificate (e.g. WVB EUR 1). The declaration of origin shall be made out on the invoice or the delivery note. For consignments with a value of more than EUR 6,000.00, the REX number of the customs exporter must also be indicated.

GB EORI number

As before, anyone in the UK involved in a customs declaration for import or export requires an EORI number. Since 1 January, 2021, it must start with GB; EORI numbers from EU member states will no longer be accepted.

- Do you have DDP deliveries to the UK or do you buy EXW in the UK? In such cases you will need a GB EORI number.**



Apply for a GB EORI number in good time. The EORI number can be applied for [here](#).

Secondment / business trips

From January 1, 2021, the UK will no longer be a party to the Agreement on the Free Movement of Persons. From this date, the [Agreement on the Mobility of Service Providers \(Services Mobility Agreement, SMA\)](#) between Switzerland and the UK will regulate the mutual access and temporary stay of service providers. There are a variety of visas for accessing the UK.

- Before departing on a business trip to the UK, check whether and which visa is required.



At gov.uk, a "[Check if you need a Visa](#)" tool is available for this purpose.

Delivery times / delayed customs clearance

After the transitional period, all deliveries from the EU to the UK must be cleared for import. It is likely that not all trucks will have the necessary customs documents. As a result, longer waiting times and delays at the relevant border posts will have to be expected despite the arrangements planned by the UK Government.

- Plan for longer delivery times / transport times for shipments to the UK.**



Consult your carrier about the current traffic situation for shipments to the UK.

Questions and further information

- ➔ Visit our regularly updated [Brexit dossier](#).
- ➔ The UK government's [website](#) provides detailed information on the changes that will take effect on January 1, 2021.
- ➔ If you require further information, please contact the ExportHelp team of Switzerland Global Enterprise at exporthelp@s-ge.com or call 0844 811 812.