

# Business Readiness event Spain

22 July 2021

# Readiness polls are running



**Please answer our short questions**

**Go to [www.sli.do](http://www.sli.do) on your browser or phone**

**Use the code [#BPDG](#)**

**10:00** Introductory remarks - **Nick White**, Agriculture and Environment Attaché, British Embassy

Presentations:

- **Flavia Munteanu**, Her Majesty's Revenue and Customs  
Customs controls
- **Anastasia Bernhardt**, Department for Environment, Food & Rural Affairs  
Movement of goods subject to Sanitary and Phytosanitary (SPS) controls
- **Mike Head**, Department for Transport  
Identity Cards
- **Margaret Whitby**, Border and Protocol Delivery Group  
Summary of UK presentations

**11:10**

**Emilio García Muro**, Subdirector General de Acuerdos Sanitarios y Control en Frontera, MAPA

Spanish certification required from 1 October / 1 January

**11:30 Round table question and answer session with presenters**

Moderator - Nick White

**12:00 Event closes**

# Question One

**Have you moved goods between GB and the EU since 1 January 2021?**

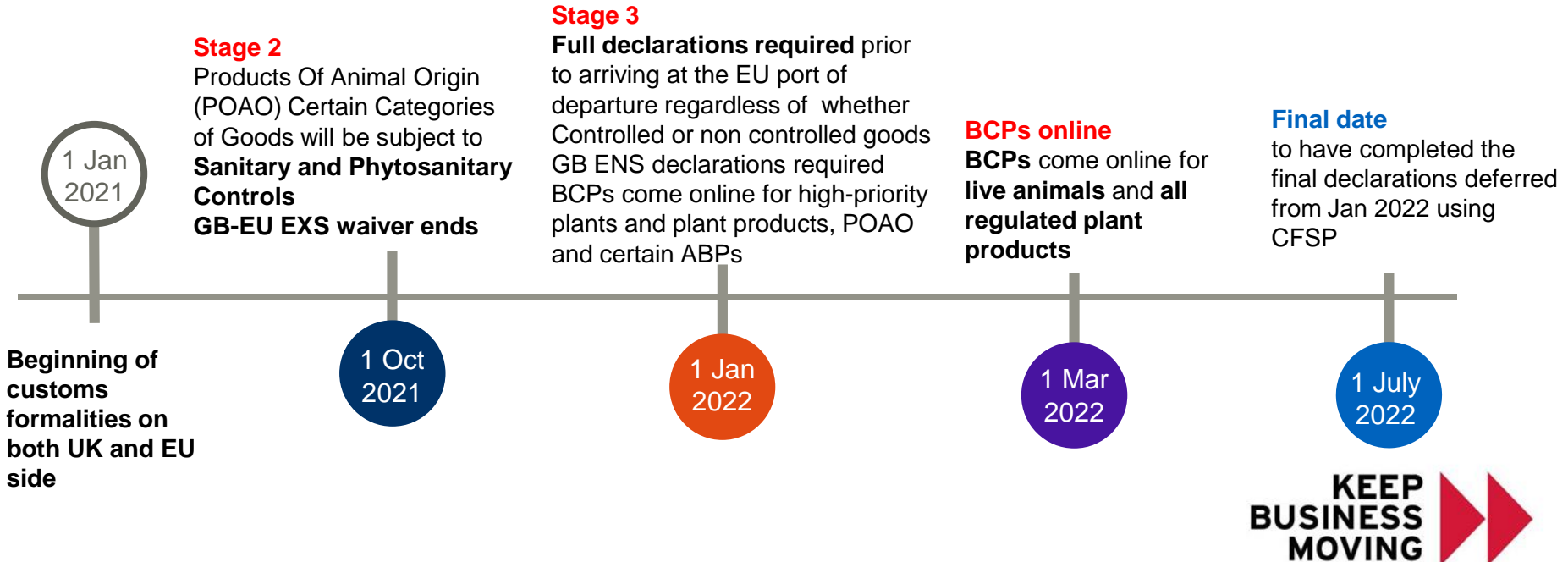
- a. Yes, I have successfully moved goods during that time
- b. Yes, but my goods were stopped at the border due to incomplete documentation
- c. No, I have not moved goods since 1 January because I am unclear on the processes
- d. No, I had no plans to move goods at this stage.



# EU to GB imports - new key dates

The Trade and Cooperation Agreement (TCA) does not offset the necessity of customs clearances

## Staged import controls - UK announcement 11/03/21



## Question Two

**Which of the following statements best applies to you/your business?**

- a. I know what procedures are required to move goods between GB and the EU
- b. I know some, but not all of the procedures required to move goods between GB and the EU
- c. I do not know what procedures are required to move goods between GB and the EU



# Customs controls

Flavia Munteanu

HMRC

# Customs overview

- The UK has introduced border controls in stages - starting with some controls from **1 January 2021** and moving to full customs controls for all goods from **1 January 2022**
- Traders importing controlled goods (such as excise goods) have been following full customs requirements from **January 2021**
- Traders importing non-controlled goods can use the deferred declaration process until **January 2022**. A supplementary declaration is due within 175 days from the date of import
- We will not be requiring carriers to submit Entry Summary Declarations (ENS) for safety and security until **January 2022**
- The UK has acceded the Common Transit Convention (CTC) in its own right from **1 January 2021**. The UK is now a separate customs territory and CTC requirements apply



- Goods must be pre-lodged in advance of crossing if moving through a listed Roll On Roll Off (RoRo) port or a location (without existing systems, or use Common Transit Convention [CTC] - we will touch on this later in the slides.)
- To facilitate readiness, traders moving **non-controlled** goods to GB will be allowed to declare their goods by making an entry into their own records. Information on what is required as part of that record can be found in the Border Operating Model - 1.1.3
- Businesses can choose to make the declaration in their records for non-controlled goods and submit information to HMRC, via a supplementary declaration within 175 days of the date of import and pay the required duty via an approved duty deferment account.
- Traders moving **controlled goods** (e.g. excise goods) will need to make a frontier declaration. This declaration can be full, or a simplified declaration depending on the trader's authorisation.

# Deferred declarations

- When a trader decides to use Staged Customs Controls 'deferred declarations' for the goods they wish to import, they need a **GB EORI** to start recording the movements in their own records in accordance with the deferred declarations process.
- This only applies to non-controlled goods. Traders will need to understand what data is required for a Customs declaration and ensure they retain the information in their own records (EIDR - Entry in Declarants Record)
- **175 days from date of import, a supplementary declaration is due. Traders can apply for relevant authorisations or use a UK Customs Agent. This must be in place at point of supplementary declaration**
- From January 2022, all goods (both controlled and non-controlled) will require declarations on import and safety and security (ENS) declarations will also be required

- Traders will have to make full customs declarations...
- ...or use simplified procedures if they are authorised to do so

**At the point of importation on all goods and pay relevant tariffs**

- Safety and Security (ENS) declarations will be required



HMG have introduced a new IT platform called the Goods Vehicle Movement Service (GVMS) to support the Pre-Lodgement model (where goods arriving at ports will have already made a customs declaration) for both imports and exports and to facilitate Transit movements. The GVMS Service allows:

- Declaration references to be linked together into one single “Goods Movement Reference” (GMR), This means the person moving goods only needs to present one reference at the frontier to prove that their goods have pre-lodged declarations
- Linking movement of goods to declarations so that goods can be processed on route
- From 1 January 2021, the GVMS is being used to facilitate Common Transit Convention (CTC) transit movements arriving in the UK.
- Notifying the risking outcome of declarations to the person in control of the goods
- From 1 January 2022, the GVMS will also support GB locations using the Pre-Lodgement model to achieve full customs control on goods for both imports and exports.

# Common Transit Convention (CTC)

- Common Transit Convention (CTC) allows the suspension of customs checks and payments of duties until the goods reach their destination.
- The UK has joined the CTC in its own right from 1 January 2021 and will be subject to the requirements of the Convention. Moving to these requirements in stages will therefore not be applicable.
- In order to move goods under CTC there are 3 distinct customs functions:
  - Office of Departure
  - Office of Transit
  - Office of Destination
- The Office of Departure and Destination functions can be completed at a customs office or an approved location (known as authorised Consignor/Consignee).
- The Office of Transit functions are a requirement placed on CTC members that must be performed when goods arrive in a new customs territory and must be completed at a customs office upon entry. This could be at or near the Border.

When moving goods using the Common Transit Convention, traders should remember the following:

- If you are an authorised consignor, then you start the transit movement on NCTS with a Local Reference Number (LRN). Using NCTS, you then produce the Transit Accompanying Document (TAD) which includes the MRN (Movement Reference Number). **Please note that the LRN is NOT a TAD.** The haulier will need to have a physical copy of the TAD including the MRN to accompany the assignment for presentation / scanning at the border.
- Officials in both the UK and across the EU have encountered numerous incidents of TADs not being discharged upon arrival at the end destination. This means that guarantees are not released and the goods should not legally enter free circulation. The risk to the trader is that guarantees will reach their limit and they will not be able to open any further movements.



# Hauliers - to note

- **Inland Border Facilities (IBFs) – reminder on the IBF App.** Details can be found on gov.uk <https://www.gov.uk/guidance/tell-hmrc-that-youre-going-to-be-attending-an-inland-border-facility>. This is the best way for hauliers to avoid delays/pre-book at IBFs.
- A reminder that you need to make sure all Local References Numbers (LRNs) are presented at IBFs for outbound transit movements, and a transit accompanying document received for each LRN.
- The best way to ensure this is to enter the LRNs into the “Attend an Inland Border Facility” app, where they can be associated with a vehicle registration number when booking a vehicle into an IBF for Office of Departure.



- The Government announced at Budget that from 1 January 2021, postponed VAT accounting will be available to VAT registered businesses for imports of goods from all countries, including from the EU
- UK VAT registered traders who delay their supplementary customs declarations must use postponed VAT accounting
- Non-VAT registered traders who delay their supplementary declarations will follow the same process as they do for customs duties
- UK VAT registered traders who do not delay their supplementary customs declarations will be able to use postponed VAT accounting when importing controlled or non-controlled goods, but are not compelled to
- UK VAT registered traders who import non-controlled goods and use the Simplified Customs Declaration process (if authorised to do so) and make an Entry in Declarant's records must use postponed VAT accounting
- Non-VAT registered traders who do not delay their supplementary customs declarations will have the same options available to report and pay import VAT through the customs processes

- From the 1 January 2021, the Rest of World rules have applied to imports and exports of excise goods moving between GB and the EU. Businesses need to complete customs import and export declarations using the relevant codes for duty paid or suspended goods
- If businesses move duty suspended excise goods to and from a tax warehouse to the place they enter or exit GB they must use the UK version of Excise Movement and Control System (UK EMCS).
- UK EMCS must also be used to move duty suspended excise goods from UK warehouse to UK warehouse
- The EU's EMCS will end at the EU border
- UK EMCS is not linked to EMCS in the EU

# Being registered in the UK or the EU

A person or business needs to be established in the UK or EU to meet a number of customs rules.

This includes being able to apply for a wide range of customs authorisations and simplifications such as Special procedures, AEO authorisation or making simplified declarations.

- In the UK, the evidence you may need to provide includes:
  - a certificate of registration issued by the Registrar of Companies
  - details of where staff are employed and the work that they carry out
  - physical premises owned or leased by the business
  - details of contracts, orders or invoices held or issued by the business
  - proof that the business has its own accounts

Further details on being UK established can be found [here](#).

# Movement of SPS products

Anastasia Bernhardt  
DEFRA

# Introduction to approach

**Overview:** Import controls for GB are being introduced in a phased approach in order to give businesses impacted by COVID-19 time to adjust whilst maintaining effective biosecurity controls.

These stages include:

## **Sanitary and phytosanitary (SPS) controls, including the requirements for:**

- Importer pre-notifications (GB importer action)
- Health certification (such as an Export Health Certificate or Phytosanitary Certificate)
- Documentary, identity and physical checks at the border or inland
- Entry via a point of entry with an appropriate Border Control Post (BCP) with relevant checking facilities

## **Processes and procedures for the export of:**

- Live animals
- Animal products
- Fish and shellfish and their products
- Plants and plant products
- High-risk food and feed not of animal origin

## Export of Products of Animal Origin (POAO) under safeguard measures

- **The GB importer must:** Pre-notify in advance of arrival using **IPAFFS** and provide the EU exporter with the unique notification number (UNN).
- **You must:** Add the **UNN onto the health certificate** and provide the GB importer with an electronic copy of the health certificate
- **The GB importer must:** Upload an electronic copy of the health certificate on to **IPAFFS**.
- **You must:** Ensure the original health certificate travels with the consignment.
- **Safeguard measures:** Action can be taken at **very short notice** to prohibit or restrict imports of certain products from certain countries following an outbreak of disease or a public health issue.

If measures are introduced because of a new or emerging disease, there may be additional steps you will need to follow to pre-notify - **outlined on [Gov.uk](https://www.gov.uk)**

## Export of live animals

- **The GB importer must:** Pre-notify arrival using **IPAFFS** at least one day in advance and supply the EU exporter/Official Veterinarian (OV) with the Unique Notification Number (UNN)
- **You must:** Add the **UNN onto the health certificate** and provide the GB importer with an electronic copy of the health certificate
- **The GB importer must:** Upload an electronic copy of the health certificate on to **IPAFFS**
- **You must:** Ensure the original health certificate travels with the consignment
- **Physical checks:** Will be carried out at destination

## Export of high priority plants

- **Phytosanitary certificates** are required for imports of high-priority plants and plant products.
- **You must:** Ensure the phytosanitary certificate, where possible, travels with the consignment
- **Documentary, identity and physical checks** of high-priority plants and plant products are carried out at places of destination.
- The list of high-priority plants and plant products can be found on [Gov.uk](https://www.gov.uk).

## 1 October 2021

- **POAO and (ABP):** Requirement for Export Health Certificates, documentary checks and pre-notifications using IPAFFS introduced
- You must provide an electronic copy of the Export Health Certificate to the GB importer, to upload onto the notification in IPAFFS
- **HRFNAO:** Requirement for pre-notifications using IPAFFS introduced

## 1 January 2022

- **POAO and ABP:** Goods required to enter via a point of entry with an authorised BCP in order to undergo documentary, identity and physical checks as required
- **HRFNAO:** Goods required to enter via an established point of entry with an authorised BCP in order to undergo documentary, identity and physical checks as required
- **High-priority plants and plant products:** Identity and physical checks move to BCPs
- **Regulated plants and plant products:** Pre-notifications required, requirement for phytosanitary certificates and documentary checks introduced

## 1 March 2022

- **Live animals:** Live animal BCPs will be operational by this point
- **All regulated plants and plant products:** Identity and physical checks conducted at BCPs

What are the new phases for delivery of SPS import controls on POAO?

## October 2021:

- POAO (animal products for human consumption) must be accompanied by an export health certificates (issued by the competent authority in the EU country) and pre-notified using IPAFFS before arrival at the border
- Certain composite products are exempt from SPS controls at the border under Article 6 of Regulation 2007/275.
- The EU exporter must:
  - Ensure that a copy of the health certificate accompanies the consignment.
  - Provide a copy of the health certificate to the GB importer to upload a copy onto IPAFFS.
- The requirements already in place for POAO under safeguard measures will continue.

## January 2022:

- POAO will require pre-notification using IPAFFS and must be accompanied by an export health certificate unless an exempt composite product under Article 6 of Regulation 2007/275.
- POAO must arrive at an established point of entry with an appropriate Border Control Post (BCP).

# Composite Products

**Overview:** Composite products are food containing both **processed** Products of Animal Origin (POAO) and products of plant origin.

[Composite products](#) must follow the phased requirements of POAO and these goods must be pre-notified and accompanied by a Export Health Certificate from October 2021 unless otherwise exempt.

## Some goods are exempt if they:

- contain <50% processed animal product;
- contain no meat product; and
- meet the requirements in Article 6 of Decision 2007/275.

## What are the new phases for delivery of SPS import controls on ABPs?

### October 2021:

- ABP not for human consumption must be accompanied by a Export Health Certificate, official declaration or other official documentation depending on the commodity being imported.
- For ABP, pre-notification using IPAFFS before arrival at the border will be required.
- The EU exporter must:
  - Ensure that a copy of the Export Health Certificate accompanies the consignment.
  - Provide a copy of the Export Health Certificate to the GB importer to upload a copy onto IPAFFS.
- The requirements already in place for high-risk ABP under safeguard measures will continue.

### January 2022:

- ABP must be accompanied by a GB health certificate or other official documentation, depending on the ABP commodity being imported.
- Further guidance on commodity-specific requirements can be found in the Import Information Notes ([INNs](#))
- ABP will need to arrive at an established point of entry with an appropriate Border Control Post (BCP).
- For ABP products, pre-notification will be required.

What are the new phases for delivery of SPS import controls on ABPs?

## January 2022:

- Importers will need to check if the CN (Combined Nomenclature) code for their product is listed in Regulation 2019/2007 in order to determine whether their commodity must be imported via a point of entry with an appropriate BCP.
- Goods will be subject to documentary, ID and physical checks on a risk basis.

## What are the new phases for delivery of SPS import controls on live animals and germinal products?

### October 2021:

- The requirements already in place for live animals and germinal products (including semen, embryos or egg cells) will continue.

### January 2022:

- Germinal products must continue to be accompanied by a GB health certificate and pre-notified in IPAFFS before arrival at the border.
- There are new requirements for germinal products to enter via an established point of entry with an appropriate Border Control Post (BCP).

### March 2022:

- Live animals must also enter via an established point of entry with an appropriate BCP for documentary, identity and physical checks.
- High-risk live animals imported from the EU to GB will continue to be checked at 100%.

## What are the new phases for delivery of SPS import controls on plants?

### From 1 January 2022:

- Physical and identity checks of high-priority plants and plant products will move from Places of Destination to Border Control Posts.
- The requirement for pre-notification and phytosanitary certificates will be extended to all regulated plants and plant products (i.e. not just those which are ‘high-priority’).

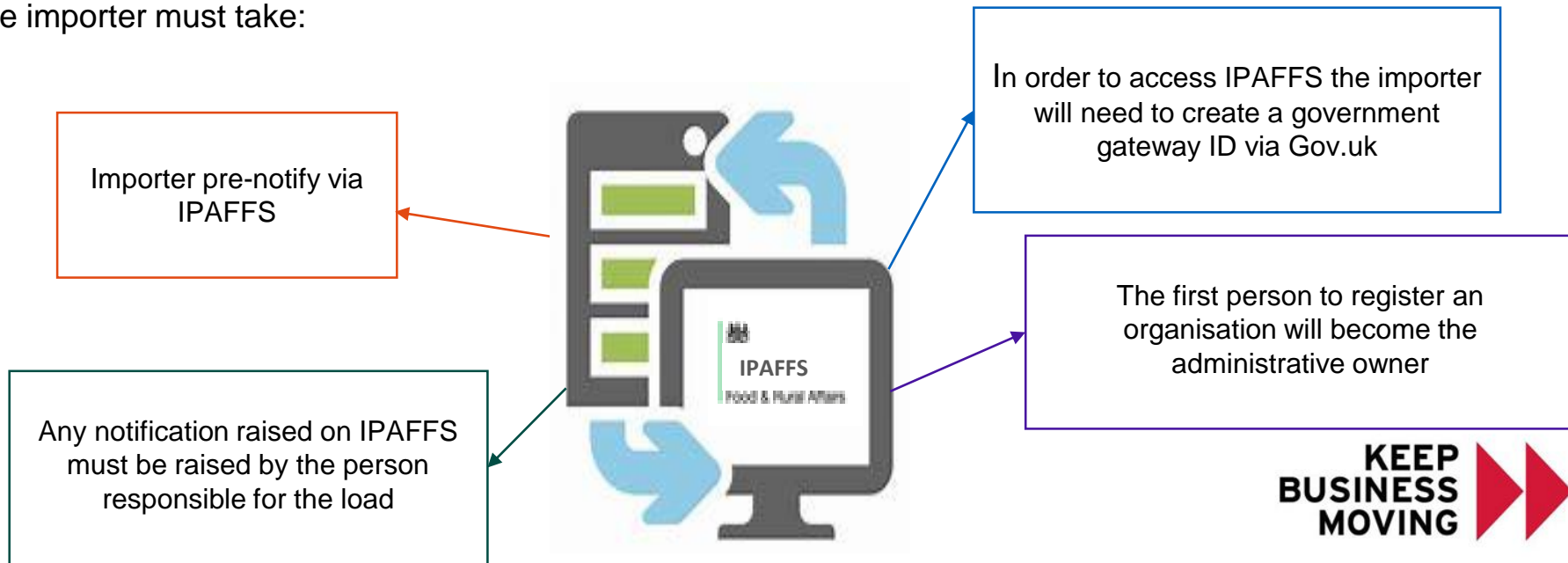
### From March 2022:

- The UK’s Border Operating Model will be fully operationalised with physical and identity checks on all regulated plants and plant products being carried out at Border Control Posts.

# UK Government **Importer pre-notification process - IPAFFS**

**Overview:** From October 2021, POAO for human consumption and some ABP arriving from the EU or EEA countries will need to be pre notified via The Import of Products, Animals, Food and Feed System (IPAFFS)

**IPAFFS:** GB national system for notification of the arrival of SPS goods into Great Britain. Below is the process the importer must take:



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# Pre-notification times

- For movements of live animals, importers need to submit import pre-notifications via the domestic notification system (IPAFFS) at least one working day in advance of the goods' arrival at the point of entry.
- For plants and plant products, importers need to submit import notifications at least four working hours prior to arrival for Roll-On Roll-Off and air movements, or at least one working day prior to arrival by all other modes of transport – along with the phytosanitary certificate.
- Pre-authorisation by Defra/APHA of ABP prior to any imports taking place may also be required.

# Export Health certificates



## General Overview

**From January 2021:** POAO under safeguard measures must be accompanied by an Export Health Certificate.

**From October 2021:** POAO for human consumption and ABP not for human consumption must be accompanied by an Export Health Certificate.

## Certification Steps

1. The **Export Health Certificate** is issued by the competent authority in the EU country.
2. The **EU exporter** is responsible for obtaining the health certificate.
3. The **EU exporter** must provide the importer with an electronic copy of the export health certificate for it to be uploaded to IPAFFS.
4. The **EU exporter** must ensure a physical copy travels with the consignment.

## Links to further information:

- Model Export Health Certificates are available [here](#)
- **If there is no GB health certificate for your commodity visit [Gov.uk](https://www.gov.uk) for an import licence**
- If there is no import licence, you should complete an [IV58 form](#) on gov.uk and email a completed version to [imports@apha.gov.uk](mailto:imports@apha.gov.uk)

## Changes for phasing of marketing standards & organics

### 1 January 2022:

- EU hop imports into GB - the end of the period during which EU certificates will be accepted for release into UK free circulation has been extended from 1 July 2021 to **1 January 2022**.
- EU organic imports into GB - the end of the period during which a certificate of inspection (COI) will not be required has been extended from 1 July 2021 until **1 January 2022**.
- From **1 January 2022**, EU organic products imported into GB will require a COI (Certificate of Inspection).

### 1 March 2022:

- EU fruit and vegetables imports into GB - the end of the period during which there will be no specific certification requirements for the release into UK free circulation has been brought forward from 1 January 2023 to **1 March 2022**.

**The GB organic import system is currently paper-based. Exporters will need to contact the GB port directly to inform them of the consignment so that the COI can be endorsed speedily.**

## Arrangements for importing wine into Great Britain from 1 January 2021.

Currently, wine products imported to GB from the EU (including wine from origins outside the EU) can travel without having to produce a TCA certificate or a VI-1 certificate. The UK government have [pledged to remove the requirement](#) for VI-1 certificates on all imports of wine into Great Britain.

More information on this will follow in due course.

- Olive Oil is exempt from SPS import checks.
- PCs are not required for plant products such as fruit and vegetables that have been processed and packaged to the point that they no longer pose a biosecurity risk.
- Processed products such as olive oil, do not require a phytosanitary certificate and aren't subject to import checks as part of the new phased import controls for plants and plant products.

# Be prepared...

Actions to take 1<sup>st</sup> October 2021

For POAO and ABP not for human consumption:  
Make sure you provide the importer with an electronic copy of the **health certificate**.  
Make certain the **health certificate travels with** the consignment.

Actions to take 1<sup>st</sup> January 2022  
(Plants)

- Make sure you the **phytosanitary certificate** and where possible travels with the consignment.
- Make sure the importer submits a pre-notification.

For all information and guidance please visit [Gov.uk](https://www.gov.uk)

# Identity cards

## What's changing

From **1 October 2021** it will not be possible to enter the UK using an EU, EEA or Swiss ID card, except where the holder has **applied to the EU Settlement Scheme by 30 June 2021** or otherwise has **protected rights under the Citizens' Rights Agreements**.

This means most EU, EEA or Swiss nationals will need to use a passport, rather than an ID card, to enter the UK from 1 October. People who arrive at the UK border with incorrect documents may be refused entry.

EU, EEA and Swiss citizens may use their national ID card to enter the UK until at least 31 December 2025 if they have:

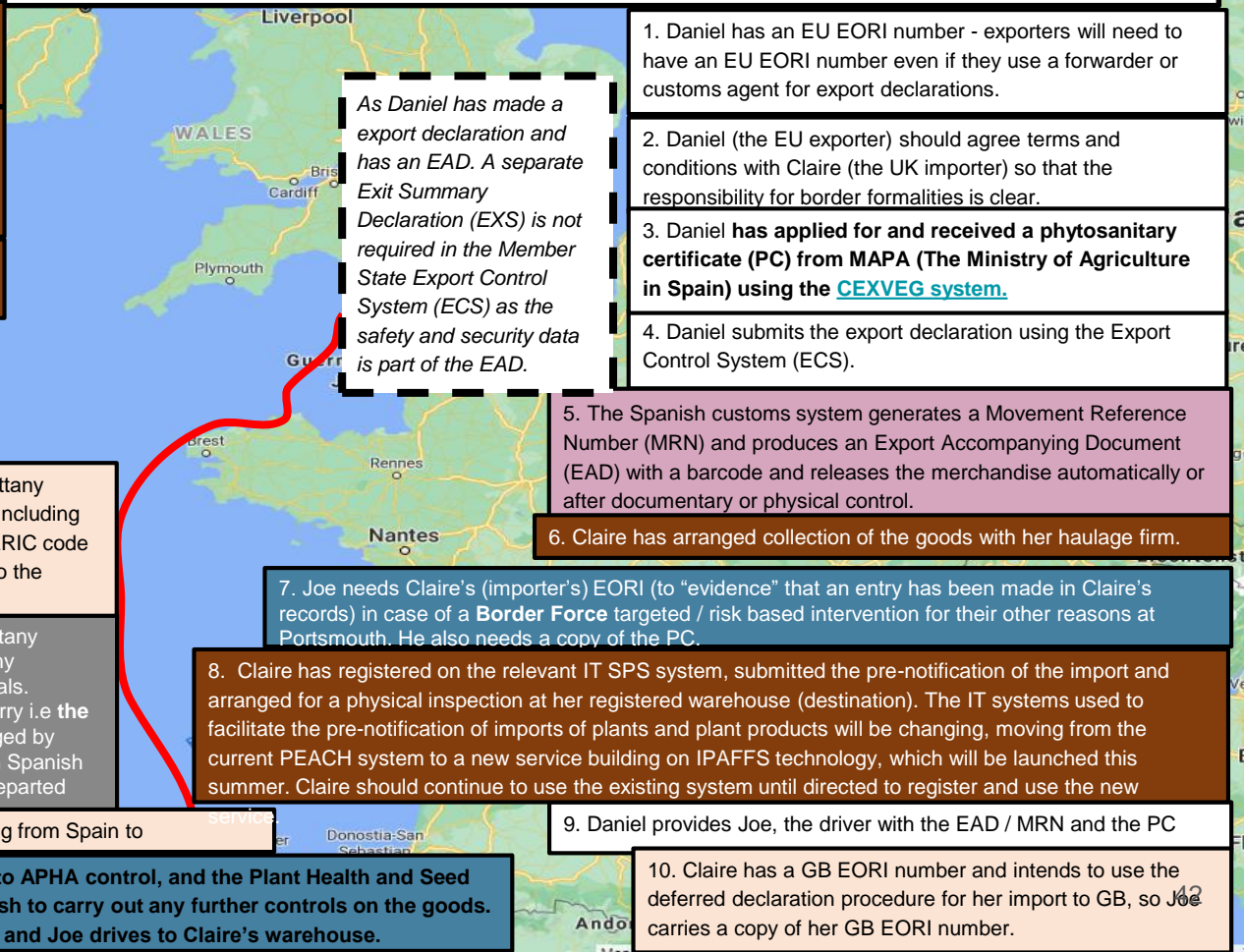
- settled or pre-settled status under the [EU Settlement Scheme](#)
- an [EU Settlement Scheme family permit](#)
- a [frontier worker permit](#)
- a visa as a [S2 Healthcare Visitor](#)
- Swiss nationals may also travel using an ID card if they have a visa as a [Service Provider from Switzerland](#).

Gibraltar identity cards held by British citizens and Irish passport cards may continue to be used for travel to the UK

# In summary Margaret Whitby BPDG

**Case study**  
Exporting tomato  
seeds to the UK  
*1st November 2021*

**EU Export / GB Import example: Daniel is based in Spain and he exports tomato seeds to the UK. The goods are exported on 1 November 2021.**



15. Claire has checked the tariff rates, and once her goods arrive she updates the entry into her own records with detail from the import including the date and time of entry.

16 Claire is VAT registered and so can use postponed VAT accounting to account for import VAT. This is paid quarterly and cannot be delayed six months.

17 Within 6 months of 1 November 2021, Claire will need to have applied and be authorised for simplified declarations (CFSP) for imports. She will need this to submit her supplementary declaration within 175 days of the date of import.

18. Claire submits the supplementary declaration before 1st May 2022 (175 days after the import date).

19. Claire has registered for a duty deferment account, which is debited after she has submitted the supplementary declaration.

**No GB ENS data input is required by Joe's firm, because the import is before 1 January 2022.**

- Daniel - EU Exporter**
- ES administration**
- Claire - UK Importer**
- Joe - Driver**
- HMG administration**
- Brittany Ferries (carrier)**

11. Joe's firm completes a form for Brittany Ferries to provide details of the goods including the first 4 digits of the Commodity / TARIC code and Joe transports the consignments to the Spanish port

12. The MRN (EAD) is scanned by Brittany Ferries and the driver must answer any questions from Spanish Customs officials. Only when the truck embarks on the ferry i.e the **point of no return** is the EAD discharged by Brittany Ferries IT communicating with Spanish systems to confirm that the ferry has departed

13. Joe and the truck make the crossing from Spain to

14. **The consignment is now subject to APHA control, and the Plant Health and Seed Inspectorate (PHSI) decide if they wish to carry out any further controls on the goods. They decide not to check the goods and Joe drives to Claire's warehouse.**

As Daniel has made a export declaration and has an EAD. A separate Exit Summary Declaration (EXS) is not required in the Member State Export Control System (ECS) as the safety and security data is part of the EAD.

1. Daniel has an EU EORI number - exporters will need to have an EU EORI number even if they use a forwarder or customs agent for export declarations.

2. Daniel (the EU exporter) should agree terms and conditions with Claire (the UK importer) so that the responsibility for border formalities is clear.

3. Daniel **has applied for and received a phytosanitary certificate (PC) from MAPA (The Ministry of Agriculture in Spain) using the CEXVEG system.**

4. Daniel submits the export declaration using the Export Control System (ECS).

5. The Spanish customs system generates a Movement Reference Number (MRN) and produces an Export Accompanying Document (EAD) with a barcode and releases the merchandise automatically or after documentary or physical control.

6. Claire has arranged collection of the goods with her haulage firm.

7. Joe needs Claire's (importer's) EORI (to "evidence" that an entry has been made in Claire's records) in case of a **Border Force** targeted / risk based intervention for their other reasons at Portsmouth. He also needs a copy of the PC.

8. Claire has registered on the relevant IT SPS system, submitted the pre-notification of the import and arranged for a physical inspection at her registered warehouse (destination). The IT systems used to facilitate the pre-notification of imports of plants and plant products will be changing, moving from the current PEACH system to a new service building on IPAFFS technology, which will be launched this summer. Claire should continue to use the existing system until directed to register and use the new

9. Daniel provides Joe, the driver with the EAD / MRN and the PC

10. Claire has a GB EORI number and intends to use the deferred declaration procedure for her import to GB, so Joe carries a copy of her GB EORI number.

# EU to GB imports - new key dates

## 1 October 2021

- EXS waiver ends
- Health certificates and pre-notification of all:
  - Products of animal origin (POAO) and certain animal by-products (ABPs)
  - High-risk food & feed not of animal origin

## 1 January 2022

- ENS Safety and security declarations requirements required
- Import declarations, or use of simplified procedures (CFSP) if authorised to do so and the payment of relevant tariffs at import
- Goods required to enter via BCPs in order to undergo documentary, identity and physical checks as required
- Phytosanitary certificates for regulated plants and plant products
- High-priority plants and plant products - physical and identity checks move from Places of Destination to BCPs. Remote documentary checks.

## 1 March 2022

- BCPs come online for live animals and all regulated plant products

# Guidance and support

- The [Border Operating Model \(BOM\)](#) is available on gov.uk and was updated on 20 July
- There are also step by step [import](#) and [export](#) guides available on gov.uk
- The haulier handbook is available. This is a [Guidance for hauliers](#). Further updates have been scheduled for Summer 2021
- HMRC help and support can be found [here](#)
- DEFRA help and support can be found [here](#)
- You can send follow up questions about UK procedures to the Border and Protocol Delivery Group (BPDG) at [bpdg.enquiries@cabinetoffice.gov.uk](mailto:bpdg.enquiries@cabinetoffice.gov.uk)
- BPDG's EU Technical and Operational team can be contacted at [eu-ms-engagement@cabinetoffice.gov.uk](mailto:eu-ms-engagement@cabinetoffice.gov.uk)

# Q&A session

## Question Three

**Following the webinar, I understand what I need to do to move goods between GB and the EU**

- a. Yes
- b. No



**CHECK.  
PREPARE.  
KEEP MOVING.**

**KEEP  
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