

Issue	BRC Action	Current Position	Status
Ensuring GB borders are ready to make full border checks	Asked for postponement of full checks until borders are ready to avoid supply chain disruption	UK Government will not introduce full GB border checks until July 2021	
Avoiding customs duties on goods crossing from GB-EU and EU-GB	Advocating a zero-tariffs, zero-quotas trading relationship.	Dependent upon agreement between UK-EU on fisheries, state aid and wider level playing field. UK Government may utilise Tariff Rate Quotas (TRQs) to dampen impact of high tariffs on agri-food imports	
Postponed VAT accounting and/or payment for imported products into GB	We sought this easement from January 2018 and again from December 2019. Now liaising with HMT on delivery thereof	UK Government to introduce this from January 2021. Will require accounting for import VAT on GB-NI goods supplies	
Detail of rules of origin (RoO) in the UK-EU agreement to ensure companies can secure maximum value	We are seeking generous rules of origin which provide for maximum flexibility in terms of qualifying content for preferential tariff treatment, particularly for clothing and textiles retailers	UK Government proposing cumulation model involving content from current EU and future UK FTAs. EU not prepared to agree this and has instead recommended RoO based on PEM Convention terms	
Ensuring workable new arrangements on VAT between GB and NI	We are advocating speedy and pragmatic actions from HMG to implement the terms of the Protocol on intra-UK VAT	Clarity still elusive from HMG and the Specialised Committee on what databases companies will need to use, and how these will link to EU VIES database	

Mutual recognition of conformity assessment (electrical and industrial goods)	We are advocating a mutual recognition for conformity assessment arrangement within the overall agreement	UK Government proposing this, but EU not supportive despite past precedents. Would add extra costs to marketing goods in the EU if not in place	
Safety and security declarations for goods	We advocated an agreement to remove need for safety and security declarations for goods moving between GB and EU	UK Government has not agreed to this. Safety and security declarations required from 2021	
Increased cost of registering pharmaceuticals and cosmetics for the UK market	We are advocating annexes within the final agreement to provide additional facilitations for these sectors supplementary to any Trade in Goods TBT chapter.	UK Government has proposed these. EU opposed at present. Time may be against inclusion in any agreed final text by October	
Increased burden of registering and demonstrating safety of chemicals for the UK market (REACH)	We are advocating a distinct chemicals annex in the final agreement to facilitate information sharing between the ECHA and the HSE in the UK to minimise burdens on retailers	UK Government has proposed this. EU opposed at present. Time may be against inclusion in any agreed final text by October	
Exporting food to the EU is extremely bureaucratic and not designed for JIT delivery	We have asked for a simplified system which reduces bureaucracy and checks at the borders with notice periods for export which reflect JIT delivery	Apart from two easements listed below, the UK Government is not pushing for major changes meaning significant barriers to export from GB to EU	
Process of exporting food, obtaining export health and phytosanitary certificates is very bureaucratic and slow	To ease the burden we asked the UK Government to change its certification process to help businesses cope	UK Government currently working on two processes, a group certificate scheme to help exports of complex products such as ready meals and a self-certification process for fruit, veg and plants. Details should be available Autumn	

Transporting food from GB to NI will require full paperwork and certification as if exports to the EU adding huge bureaucracy and cost	We have suggested a robust alternative based on a trusted trader approach to avoid daily paperwork and certification	UK Government has adopted our position and raised it in negotiations with the EU. It will present a detailed paper in September. Achieving this would require concession from the EU	
Food on the NI market will need to be compliant with EU regulations from 1/1/21 reducing scope of products and risking non compliance	We have asked UK Government to raise this as part of the negotiations to ensure UK consistency of product. We have also asked NI authorities to take a pragmatic approach to enforcement from day 1	UK Government unsure it will secure concessions as it committed NI would stay in EU food regs as part of the NI protocol. Pragmatic enforcement from day 1 more likely but will require intervention.	
UKCA marking for toys and other products on the GB market from 1/1/21 (and marketability of CE marked goods)	We have asked BEIS for realistic workable transition periods to implement the changes. 1 January 2021 is undeliverable without huge unnecessary relabelling costs without any benefits to the consumer.	UK Government guidance published on 1 September allows CE marked goods to circulate in GB market until 1 January 2022. Still new red tape for goods intended to circulate in GB/NI or GB/EU markets.	
The hygiene healthmark for products of animal origin needs to change from 1/1/21	We have asked FSA for time for suppliers to make the change, allowing existing and new mark to be used for a period. We have also asked for the changeover to be allowed before the end of the year to allow export products to be ready	FSA is preparing guidance which we expect will be published in September. It is likely to allow companies to begin the change in December and for products on the GB market to be able to use either mark until September 2022	
Import/export of food with marketing regs – organics, wine, free range, mineral water etc part of negotiations and if	We have asked Defra to ensure these are agreed in the final deal. If not we have asked for pragmatism on imports, to avoid tit for tat action and clear guidance on what is allowed on the EU market	Progress is slow and time is running out. There may be a fix for organic exports, more details in September but less clarity on others. Not clear if the	

not agreed could lead to  
retrictions both ways

UK Government will take action against  
EU imports.

