Kieran O' Donnell TD
Chairperson to the Joint Committee on Transport and Communications Networks

21 January 2021

Meeting Date:	**22 January 2021**
Meeting Time:	**1pm**
Meeting Subject:	**Customs Checks post-Brexit.**
Meeting Venue:	**Committee Room 4, LH2000, Leinster House**

Witness Opening Statement: - Eoin Gavin, Vice President, Shannon Chamber

Thank you, Chairperson and Committee, for giving me this opportunity to present here today, in my capacity as Vice President of Shannon Chamber, representing our 300 plus member companies and, also in my capacity as the operator of a long-established haulage company – Eoin Gavin Transport.

I am delighted to get this opportunity to further expand on the contents of letters submitted by Shannon Chamber to Government Ministers and our local elected representatives on 11 January in which we outlined issues being experienced in the movement of goods to and from the United Kingdom since 1 January 2021.

I will expand further here today.

Hauliers and freight forwarders expected that Brexit would result in some teething problems, as with any major change. We accept that some exporters and importers must take some blame for the current delays being experienced by hauliers in transporting goods from Ireland to the United Kingdom; some don't have the systems in place for trading with the UK as a third country.

However, there are inherent procedural flaws and systems' issues also.

We understand the requirement to complete an import and export declaration when trading with a 3rd Country and that a 3-step process is now required on import for hauliers trading with the UK:

1. They must prepare a customs declaration and get an MRN reference or pre-clearance to ship.
2. They then need to complete an Entry Summary Declaration (ENS) - safety and security declaration - duplicating most of the customs' entry detail.
3. They need to prepare a PBN or a permission to board a ship with the load; this must incorporate all the MRNs.

However, therein lies the problem. As these three layers are being completed, Revenues' systems try to tally and match them up in the background but, this is not working, resulting, in many cases, in one stage wiping out the other stage. Also, the more entries one has to make, the more likely there are going to be human errors.

My question is: Why aren't the customs declarations and the security declarations being combined for imports from the UK as is currently happening with Irish export declarations and, as exports from the UK to mainland Europe are also combined with one declaration.

I would also question why the obligations under Steps 2 & 3 above have shifted to the operator and not the carrier (the ship), which is the requirement under the Unions Customs Code, brought in after 9/11.

There are other issues causing delay. These relate to drivers getting notifications of the status of their goods - green or orange - before disembarkation from ferries at Irish ports. The only way they can currently check this is by logging onto the Revenue website for their green, orange, or red routing details.

There is an immediate need for routing status display screens on ferries to expediate the disembarkation process and, as has been promised by Revenue.

Let me give you an example:

A truck load going from **London to Paris** requires an export declaration which creates an MRN number and barcode. The driver arrives at ferry check-in at Dover and presents his papers with the MRN to check in. The ferry company uploads and he boards the ferry. On board the ferry the driver checks the display screen in the restaurant area to see which lane - green or orange - he or she needs to follow on disembarkation from Calais.

A truck load from **London to Dublin** requires an export declaration which recreates a MRN number and barcode. The driver's transport office needs to create a separate entry security declaration which has the same details as the export declaration; this creates another MRN number and barcode. The driver's transport office then needs to enter both MRN numbers in the Revenue.ie website to get a pre boarding notification. The driver's transport office then needs to upload this PBN number on the ferry company's website to confirm the booking. The driver can then drive to the port to check in on the ferry. Thirty (30) minutes out front Dublin Port, the driver's transport office needs to enter the PBN number on the Revenue.ie website to check which lane the driver needs to follow on disembarkation from the ferry at Dublin Port.

Quite a contrast, you will agree.

I am here today, Chairperson and Committee, to urgently request that these issues be followed up on and prioritised by Revenue as they are having a significant impact on the economy and will result in stifling trade and slowing down our export-led economy.

This requires urgent attention; the solution must be executed as a priority and we would ask for a timeline on this be given as a matter of urgency.

Thank you.