

Opening Statement

Most exports have moved to direct route ferries due to the uncertainty of delivery times and travel through the UK.

The level of goods in Dublin Port is down to 30% of pre-Christmas volumes. This is a mixture of stock piling and the cumbersome nature of importing goods into Ireland as outlined in my below points.

Due to the move by hauliers and customers to direct ferries there has been a loss of connectivity from the UK to Ireland through Dublin & Rosslare Port.

Some ferry operators have removed services at weekends because of the direct ferries.

Dublin Port is suffering lack of space as the agencies, customs etc have taken a sizeable amount of land for their terminals therefore the Port is lacking room for bulk cargo, car transporters and drop trailers. Also, container depots have not opened for longer periods of time as requested, nor have the main ferries moved their times to help facilitate the issues.

1. The new systems set up by the Irish Revenue Commissioners for Pre-Boarding Notification (PBN), new requirements for safety and security declarations and import/export declarations are not working effectively. It is clear that neither the Irish authorities nor industry took an opportunity to trial the new systems before they came into effect. Consequently, the new systems have been overloaded and goods are being blocked and delayed. Licensed hauliers as carriers of the goods have borne the brunt of these disruptions.
2. The IT systems being employed by the Irish authorities are not working and require substantial revision to ensure that they can be effective at clearing the backlog of goods stuck in the system and preventing such problems occurring again.
3. Currently the system is being challenged at a time when import/export levels are lower than normal due to pre 31 December stockpiling. The systems will collapse entirely once trade volumes are restored to normal levels.
4. It is deeply frustrating that despite the long lead in to Brexit that the systems and approaches being operated by the Irish authorities to manage post Brexit trade are not fit for purpose and are actually frustrating rather than facilitating trade.
5. There are a number of specific measures that could be introduced to address the current crisis;
 - a. Co-ordination between the different systems being operated by the Irish authorities – there are alarming indications that the systems (ICT and otherwise) being operated by the Revenue Commissioners and the Department of Agriculture, Food and the Marine are not working in tandem.
 - b. New protocols and procedures should be applied at the Irish Ports to work with and support those involved in the transport of goods – at present there is very limited communication or information being provided and a distinct lack of engagement at all levels.
 - c. Review processes to address the imposition of unnecessary or repetitive checks on goods being imported to Ireland – a risk-based approach to inspections is badly needed to prevent unnecessary blockages to the trade in goods.
 - d. Lack of oversight – there is a distinct lack of oversight on the operations of the different Irish authorities in the Ports. There is no central entity or office that is assessing how each of the Irish agencies are responding to Brexit and consequently the current problems being experienced are not being diagnosed and addressed.

- e. Given the lack of preparedness of the Irish authorities for Brexit, some form of adjustment period will be required to allow them to get their systems and processes to work effectively.

Licensed hauliers have to meet a plethora of new protocols and requirements to keep goods moving including securing some or all of the following:

- A Master Reference Number (MRN)
- A Pre-Boarding Notification (PBN) ID
- An Entry Summary Declaration (ENS) Number
- A Transit Accompanying Document (TAD)
- An Export Safety and Security Declaration (EXS)
- Customs Checks
- DAFM Checks
- HSE Checks