# **Ireland and UK Links**

People, History, Trade, Laws, Politics

Unique Common Border Ireland the only country in the EU with a UK land border.

Joint commercial contracts Ireland and the UK as treated as one market organizationally and contractually by companies

UK land bridge 66% of Irish goods exporters transit goods to EU and other international markets via the UK's roads. **Common language** Ireland and the UK are both English speaking countries

Same consumer taste Ireland and the UK are considered as one market with identical products being offered in both.

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**Common-law legal system** Ireland and the UK have a common-law legal system unlike other EU countries. All Island economy There are fully integrated commuting patterns, shopping habits, and value chains across the Island

UK exports and imports Many Irish SMEs, who export or import, only trade with the UK market.

**Common Travel Area** Common travel area CTA) agreements have operated between Ireland and the UK since the 1923.

## **Brexit: Emerging Impacts?**

People, History, Trade, Laws, Politics

**Unique Common Border** The land border becomes "hard". Higher business costs, increased political and community tensions

Joint commercial contracts Ireland and the UK can no longer be managed as one market by companies. Higher business costs.

**UK land bridge** 4 costly new customs checks slow the transit goods via the UK's roads. **Higher cost of business** 

**Common language** 

Ireland becomes the sole English speaking country in the UK. More Irish job opportunities in the EU

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Same consumer taste Product contents, safety standards, labelling and packaging standards all diverge. Higher Prices

**Common-law legal system** EU laws only apply in Ireland. New costs of legal compliance. Higher costs to business and consumers

All Island economy Workers cannot move freely, shopping patterns change, value and supply chains are disrupted

**UK exports and imports** Irish SMEs uncompetitive due to added trading costs, duties and regulations. SMEs go out of business.

**Common Travel Area** Common travel area CTA) continues. EU law changes situations in Ireland. **Citizen rights diverge** 

# **Brexit: The Border Issue**

Keeping Ireland a single Integrated free movement market

Today goods, services and people can freely move in and out between the Republic of Ireland and Northern Ireland.

In a Hard Brexit, customs and other formalities would be required at all the points of entry and also on the Border with Northern Ireland.

The EU Backstop looks to retain free movement by just having checks at the points of entry.





#### DEFAULT AFTER BREXIT UK OUTSIDE OF CUSTOMS UNION AND SINGLE MARKET

Border checks required between Ireland and Northern Ireland:

Custom duties

Rules of origin

VAT and excise duties

- Product safety and quality standards
- Sanitary requirements for live animals

and products of animal origin

Impact on North-South cooperation

#### EU'S 'BACKSTOP' PROPOSAL TO APPLY UNLESS AND UNTIL ANOTHER SOLUTION IS FOUND

Open border between Ireland and Northern Ireland

Access of Northern Ireland to Single Market for goods:

- EU tariffs and rules of origin apply to non-EU goods
- EU VAT and excise rules
- EU product safety and quality standards (e.g. food, chemicals and consumer goods)
- EU rules on animal health and welfare



# **Citizen Rights**

#### Common Travel Area (CTA)

The CTA is not a Brexit competency. Ireland and the UK have non legally binding agreements covering residency, working and social security since 1923. These are being maintained after Brexit. Neither Irish citizens in the UK nor UK citizens in Ireland will have to apply for residency or reapply for benefits covered under the CTA agreements.

Bi lateral agreements under CTA

Residency and work rights

Health, Pension Soc Sec rights

## **Irish Consumers and Brexit**

Buying goods and services after Brexit

#### **Added Cost**

The ERSI calculates that Brexit will cost the average household between € 892 and € 1360 per annum

### **Alternative Suppliers**



UK suppliers are already the cheapest. Alternative suppliers will be more expensive to import / sell

Delays and Food Customs and transport delays will impact the choice of fresh produce imported from the UK

#### **Higher prices**

The UK is the main or sole source of items like make up, breakfast cereals and many inputs to Irish goods

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#### **No Irish production**

Many products on Irish shelves are not and cannot, in the short term, be produced in Ireland

Exchange rates will help A bit. The Central bank found only 10% of rate benefits are passed on to Irish consumers

#### Less Choice

UK brands and suppliers will have significantly higher costs and some are likely to leave the market

#### **Quality and safety**

Changes in UK quality and monitoring may mean UK products cannot be imported to Ireland

#### **E-Commerce**

The cost of buying good online sourced from the UK will rise. Opportunity for Irish Ecommerce sites

## **Imports and Exports**

Duties, Taxes, VAT

EU VAT rules will cease. Irish traders may have to VAT register in the UK. Costs for products and services will rise due to new Tariffs (duties), taxes and process changes. Exchange rate changes will impact the costs of imports and exports.

VAT payable on imports / exports

New Duties and Taxes

Higher Transport costs

New Rules and paperwork

# Single Administrative Document (SAD)

The post Brexit customs form used for imports and exports to the UK

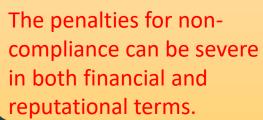
What is the SAD? SAD is used for trade with non-EU countries and for the movement of non-EU goods within the EU.

### What does it do?



SAD has all the data for customs to process post Brexit trade in and out of Ireland for / from the UK

#### **Penalties**



#### Who has to use it?

Any trader importing or exporting physical goods to / from the EU and after Brexit, trade with the UK

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Who creates the SAD? Completing the SAD document is the responsibility of the trader shipping the goods.

#### **Retaining Copies**

SAD is an 8 ply form. One of these must be retained by the trader for their records and audits.

When is it used? Each consignment of one or more packages will need a SAD to be completed when trading with the UK.

**Tariffs / Import Duties** The importer gives the tariff code for the goods for duty calculations. Duty errors are non refundable.

**Border Delays** SAD will take time to process at export and import points. This will add time to the transit.

## **Importing €1000 of UK Goods**

Cost and Cashflow impact on €1000 of UK imports to Ireland

VAT levied at 23%. Duties are set at a low 5%. Additional costs also include customs clearance. Changes in Transport, Insurance and Exchange rates are not factored in the example. (For exports to the UK change the VAT rate to 20%)

> **October October** 2018 2019 Cost of Goods € 1000 1000 100 **Transport + Insurance** 100 **Customs Duty 5%** 50 0 **Customs Clearance** 0 100 Import VAT 23% 0 265 Total 1100 1515 **Cost Increase** 32% **Cash Flow Increase** 23%

# Labels and Packaging

#### Product Labelling and Packaging

The EU has a set of standards for the labelling and packaging of products. This means any compliant product can be sold in EU to consumers and businesses. The UK will likely change their standards in the period after Brexit. This will mean costly changes for Irish Exporters.

Standards mutually recognised ?

2 label types: EU and UK

New labels have to be UK approved

New Rules on plastic packaging

## **Exchange rates**

Impact on Imports and Exports

The exchange rate between the Euro and Sterling will impact the cost of imports and exports between Ireland and the UK. New duties and taxes must also be taken into account in post Brexit pricing scenarios.

> Imports Exports More Expensive Less Expensive

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Imports Exports Less Expensive More Expensive

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## **Financial Payments and Brexit**

Moving money to and from the UK

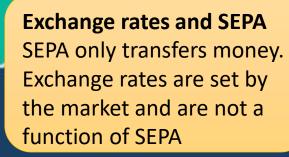
### SEPA and the UK

The UK and Ireland are in SEPA (Single Euro Payments Area) The UK can stay in SEPA after Brexit

### **SEPA Services**



Inside the SEPA area direct debits, single debit card, one bank account, cheaper transparent transfers.



What does SEPA do? It makes it easier to send money and electronic payments between the countries in the SEPA area.

#### If the UK stays in SEPA

Businesses and consumers will see no difference in they move money to and from the UK.

SEPA changes after Brexit The UK will have to adopt or have processes approved to implement changes in SEPA rules.

### Who uses SEPA

Businesses and consumers use SEPA to transfer money between the countries in the SEPA area.

#### If the UK leaves SEPA

Transferring money to and from the UK will become more difficult, expensive and take longer.

### **Credit Card costs** EU legislation forbids extra charges for using a credit card. UK credit card users will loose this protection.

### **Ecommerce**

ORDER

#### Buying or returning online Goods: Where is the Stock?

Many UK brands have .IE web sites that transfer orders to UK based management systems and stock is then sent to Ireland. Any such ecommerce orders (eg from Amazon) may have additional customs costs, duties and taxes. Products being returned to the UK may also be more costly. Return to store or an Irish location is a likely future option.

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Product is shipped from / to the UK

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# **Tourism and Brexit**

What are the likely impacts of Brexit on Tourism?

UK Tourism Market Over 40% of tourists to Ireland are from the UK. This is a mix of business and leisure tourism.

### Loss of Irish Tourists?

A weaker sterling post Brexit will make the UK a cheaper destination for Irish tourists.

#### **Driving Licenses?**

Unlike other EU countries a UK visitor to Ireland can drive with a current valid UK licence for up to a year. What will Brexit Impact? Revenue from UK tourists in the west was 12% in 2017. Northern Irish Tourists accounted for 6%

### **Retail Export Scheme**

UK visitors will be able to purchase goods in Ireland for personal consumption and have the VAT refunded

### More Conferences

As the only EU English speaking country Ireland is well positioned to gain more conference business Loss of UK Tourists? Since the Brexit fewer UK tourists arrived due to a bad exchange rate and a weaker UK economy

#### Medical Issues on holiday?

Access to the Irish health system will likely be maintained under the CTA agreements.

Alternative Markets Generating additional or new business in alternative markets will be a long and costly process

## **Retail Export Scheme**

VAT free personal purchases for non EU visitors

#### **Retail Export Scheme**

This allows non EU resident visitors to purchase goods for personal use outside the EU , VAT free.

### **Duties and Taxes**

Other duties and taxes on the items purchased are not refunded.

**Business to Business** All goods purchased under the scheme are for personal not commercial purposes.

**Businesses must register** Retailers wanting to offer this service must register for it. Official Agents are commonly used.

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Taking or sending Goods Goods purchased under the scheme can be taken immediately or shipped within 3 months.

### **Value Limits**

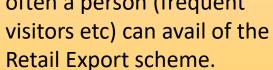
There is no upper value limit. Items over € 2000 (VAT inc) must be certified individually.

#### **After Brexit**

UK citizens visiting Ireland will be able to purchase goods VAT free for personal consumption.

**Person Present only** VAT free purchased are only offered in face to face transactions. Ecommerce is **NOT** part of the scheme.

### **Frequency Limits** There are no limits on how often a person (frequent



# **Agri-Food and Brexit**

What are the likely impacts of Brexit on Agri-Food ?

UK – Ireland market
Ireland exports over €4.25
billion of food products to
UK. It imports €3.47 billion
of UK food products.

### Low Business Readiness

61% No market Strategy, 83% no tariff research ,46% poor customs process knowledge

Banned products EG: Clorinated chicken from US in UK products or ingredients would not be allowed into Ireland. What would be impacted? All products or ingredients sourced or sent to the UK are likely to have tariffs imposed in a Hard Brexit

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Packaging and Labelling UK is likely to change the standard for food labelling. EU only is planning to ban a biodegradable plastic

**Alternative Scenario** 

UK maintains existing trading terms with EU countries, Customs done inland not at borders. Tariff Levels? The WTO tariff for1 KG of Dressed Lamb is €3.8. Honey has a EU tariff of 17%. Fish 0 – 24%

### **Quality and safety?**

Changes in UK standards, certification , QA and monitoring will increase business costs.

### **Be Different/ Innovate**

Trust, Credentials: Carbon, Social, Ethical, Health, Environment, quality standards, Irish, Vegan etc

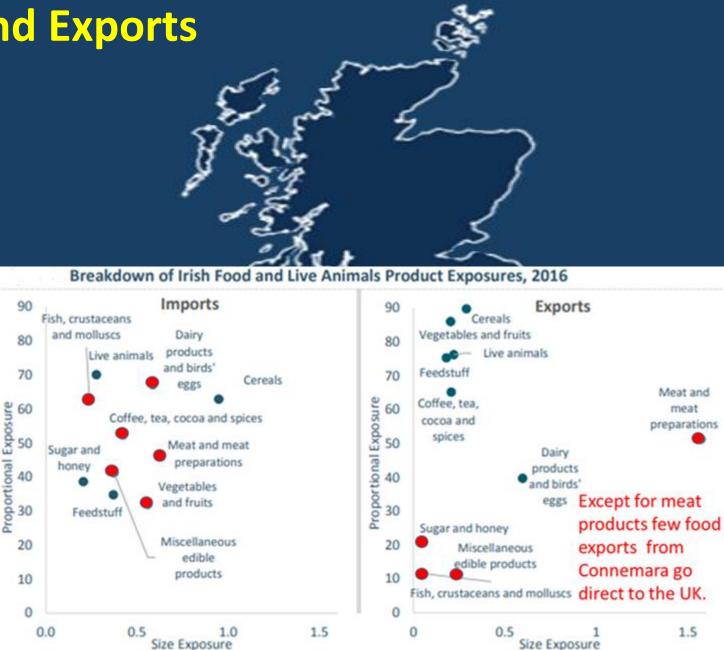
## **Brexit: Food Imports and Exports**

#### Ireland –UK trade in food stuffs

Connemara has a relatively small exposure to the UK food stuffs market. Sheep meat could have  $\notin 3 + a$  kilo tariff added.

However Irelands food supply is heavily exposed due to the amount of ingredients and prepared food items that are imported from or transit through the UK. EG All Nestle products are imported via the UK.





Source: UNCTAD Statistics External Trade goods data. Department of Finance analysis.

# Pharma / Personal care and Brexit

#### Medicines, remedies and personal care products

For health and safety reasons pharmaceuticals, medicines and cosmetics are tested and licensed for sale. In the EU products licensed in one country are recognised as suitable for sale in all 28 EU countries. After Brexit the UK will not be part of this regime. Separate UK licenses will have to be obtained to sell new Pharma products in the UK. Existing ones do not need relicensing.



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Today	After Brexit
Centralized EU licensing procedure	UK Licensing required to sell there
Mutual License recognition	No Mutual License recognition
Product can distribute freely to EU from UK	Product cannot distribute freely to EU
Shared reviews for clinical trials	UK specific clinical trials needed
Standard labelling and information	Divergent UK labelling and information
Same VAT and Tariffs regime	UK outside EU VAT and Tariff regime

# **Media: Television and Content**

Hard Brexit may benefit Irish media and Content creators

### **TV without frontiers**

Since 1989 a media or TV company registered in one EU country could operate in all 28 EU Countries

### **Alternative Content**



UK content (soaps, dramas, sports etc) will not count in the 51%. Replacing this is an Irish opportunity.

#### More EU Funds Available

UK media companies will no longer get EU funds. (€57 million of EU funds between 2014 and 2016)

### **Broadcasting post Brexit** Media companies based in the UK will need to be licenced in each of the EU 27 countries to broadcast

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#### **New Partners?**

Ireland can be come the leading European base for English language media content production.

#### Loss of Tax Breaks

UK media companies will no longer be able to get the section 48 Irish tax break after Brexit.

#### **TV content post Brexit**

EU regulations require 51% of all TV content to have been produced in the EU.

Location and resources Ireland as a production location will become more attractive. There are local opportunities in this.

### Broadband is more Critical High speed broadband is a key requirement for being able to realise local media and content opportunities

### Land Bridge: Hard Brexit

**CUSTOMS** 

#### Moving Goods through the UK

66% of all Irish exporters transport their products through the UK for export to EU and non EU countries. This is managed using the EU Customs Transit System. It is hoped that this system can continue to be used to facilitate Irish transit goods. If not then alternative routes or 4 costly customs clearances will be required.

Applies to Imports and Exports

**CUSTOMS** 

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## **Brexit Preparation Papers**

EU and UK information notices on Brexit and its impacts

The EU and the UK have prepared and released a series of papers illustrating the impact of and preparations that should be taken in relation to a hard Brexit.

These are sector papers and useful information for preparing for Brexit



EU Notices to Stakeholders The various sections of the European Commission and other EU bodies have made over 68 position papers for businesses to understand the impact of Brexit. The link to them is below

UK No Deal Notices The UK has released the first 24 papers for business sectors and administrators on what will happen in the case of a "No Deal" / Hard Brexit. The link to them is below

### **Pre Brexit Business Audit**

How well is your business positioned for Brexit?

Pre Brexit Business Audit A set of questions that help business managers quantify their exposure to UK markets and suppliers

What is the best Format? Your answers should be documented. In tests the EXCEL format sheet was found to be the easiest

Are there priority areas? Each business is different. The audit will help you identify priority change areas for your business. Why do an Audit? The information will be needed for discussions with lawyers, accountants, transporters and suppliers

Is there a Grade? No. Information is gained

to help with discussions you have to have when preparing for Brexit.

When should it be done? As soon as possible. Some changes will take months to do and require scarce professional help resources Who does the Audit? The audit can be done by the business owner. Input from other staff and managers is very useful.

Sharing the Results Your accountant, lawyer, tax advisor, transporters, suppliers etc will find the information very useful.

After the Audit

Monitor progress closely. Schedule regular meetings with your professional help resources.