Twitter Thread by Dr Anna Jerzewska

Dr Anna Jerzewska
@AnnaJerzewska

So on origin, it's getting a bit hard to keep up with all the rumours so here is where I think we are with this (correct me if I missed something)

/1 https://t.co/N5dDcbH7u7



> Brief rules of origin guidance now available - doesn't cover the easements or retrospective claims - just the basic information: the two ways of certifying origin under the UK-EU deal and how to put the claim through via CHIEF and CDS https://t.co/14Up1y44OI
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> — Dr Anna Jerzewska (@AnnaJerzewska) December 28, 2020

Claiming origin.
Two ways for traders to claim origin under the EU-UK deal:

1■ Self-certification by the exporter (standard) – normally requires an authorisation, I'm hearing that might not be needed for UK-EU trade – waiting for guidance or more info

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2■ Self-certification by the importer (new(ish), in the EU-Japan deal and some continuity deals). UK importers have little experience with this one, but helpful guidance available given initial uncertainty around using this form of certification

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Retrospective claims.
For up to 3 years under each side's domestic regulation – conditions, circumstances to be determined by both sides.

Careful here cause you might be required to have a good justification for why it wasn't submitted at the time of import.
Guidance needed
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Additional easements
On the UK side, this is part of the 6 months phase-in period– if you're deferring a customs declaration you're also deferring submitting an origin claim. If you're not deferring than origin documentation required at the time of import.

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Let's be clear, this will be an area of risk for many companies ■■

Advisors and customs practitioners will spend the next 6 months talking to companies about the need to meet rules of origin. Commercial risks here too.

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There is a question around the supplier's declaration.

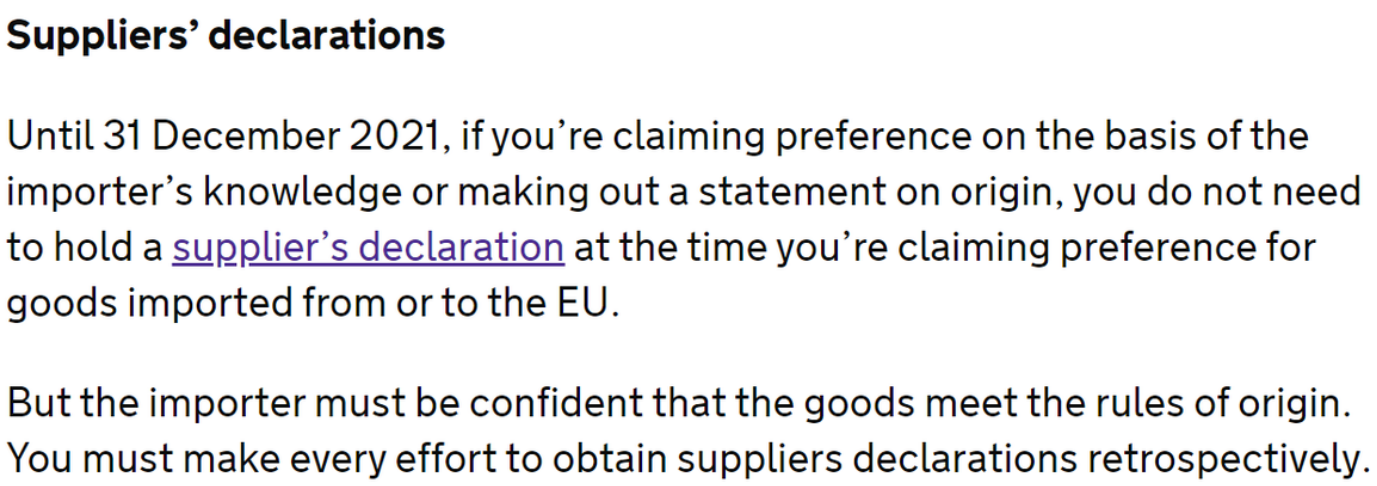
Normally this is a document that you use if you're not the manufacturer of the product or if you rely on the origin of the parts and components you're using.

It's a way to track origin throughout the supply chain

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You normally need them before claiming originating status. Now we have a derogation, a simplification. And while that means more time for businesses and suppliers to understand what is needed - it's a massive area of risk.

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Suppliers' declarations

Until 31 December 2021, if you're claiming preference on the basis of the importer's knowledge or making out a statement on origin, you do not need to hold a supplier's declaration at the time you're claiming preference for goods imported from or to the EU.

But the importer must be confident that the goods meet the rules of origin. You must make every effort to obtain suppliers declarations retrospectively.

And I do not want to sound ungrateful - I'll take all the simplifications I can get but just not sure how this is going to play out in terms of compliance... It's hard enough to get these on time as it is...

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Interestingly the UK guidance covers EU side too. Which brings me to my last point - further simplifications on the EU side...? ■■■■

As far as I can see this is where we are for now.

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I keep hearing things... so this might not be over.

We still have 3.5 days left so plenty of time before all this is implemented.

/end