

## **The Road Haulage Association (RHA)– Written evidence FUU0014**

The RHA would like to thank the EU Goods Sub-Committee for the opportunity to provide feedback on the “Future UK-EU Relations: Trade in Goods”.

This response from the RHA is focused on international road haulage between the UK and the EU, but we also touch on the relationship for road haulage between Great Britain and Northern Ireland as, from our perspective, that relationship is also a border with customs and other regulatory controls that have to be dealt with by operators and traders.

I will answer each question in turn using the numbers provided in the invitation to contribute.

### **1. As opposed to other possible outcomes, what does the presence of an EU-UK free trade agreement mean for trade in goods?**

No comment. Our focus is to deal with the agreement and the future rather than other possible outcomes.

### **2. What is your assessment of the relevant provisions in the TCA and their impact on your business or policy area?**

The RHA response is focussed on the road haulage market access provisions in the TCA.

Generally speaking, and for most purposes, the haulage market access provisions work reasonably well for UK and EU haulage operators. The provisions are more limiting than under previous Community Licence rules but meet most market needs. The rules allow UK operators to undertake two international journeys between EU member states, or one cabotage in an EU State and one international journey between two EU States. EU operators are permitted to do two cabotage journeys in the UK. Previously cabotage was limited to three journeys and international haulage between EU members states was unlimited.

The new limits suitable for most purposes.

However, there are markets where these limitations to cabotage and cross trade international work cause serious problems. The most visible of these will be the impact on cultural and entertainment haulage, the limits imposed do not allow for multi-site concert tours by orchestras, music artists, circuses, art exhibitions and multi sites sporting events. Even museum tours will be impacted.

This problem exists for both UK and EU based hauliers. EU companies face limitations in the UK when undertaking tours. In effect cabotage

rules limit any tour run with an EU operator to three sites in the UK, or limit a tour in the EU to two or three sites if run by a UK based operator.

These limitations will have a permanent effect on the ability to legally facilitate road haulage for major cultural multi-site events. We urge the UK and the EU to create a clear simple exemption from the trip limits imposed by the TCA for both UK and EU haulier's operating in each-others territory. If we fail to put in place adequate provisions to facilitate this we will find ourselves limiting the ability of artists and sports of all types in putting on multi-site events.

### **3. What do those provisions achieve?**

The current provisions of the TCA in terms of road haulage market access achieve a lot in that most goods transportation is adequately catered for. The limitation imposed by the TCA are tighter than the old EU rules, but broadly work.

### **4. What, if any, challenges arise because of those provisions? How should these challenges be addressed and what support is needed, if any?**

Please refer to the answer to question 2. We need to work on an agreement between the UK and EU that allows unlimited road haulage for goods used in cultural and sporting events that are imported on a temporary basis (under ATA Carnets).

If we fail to address this we will find many cultural events (orchestras, circuses, sports events, music festivals, art exhibitions, operas, ballet) will be limited severely.

At the moment because of COVID these events are not taking place the problem is hidden. But they will come back, and cultural events will be very important for the people of the UK and the EU. This is urgent as planning is under way for such events later in 2021.

### **5. What do you identify as the most important issues that the TCA leaves for further negotiation? What would represent a best-case resolution of these issues?**

A best-case solution for cultural goods would be to allow unrestricted market access for road haulage when carrying the equipment and material temporarily imported for cultural tours. Rules and limitations through customs ATA Carnet processes mean that the tours could continue for these goods without impacting wider market access limitations, but that will require agreement between the UK and the EU.

**6. Within the parameters of the TCA, what should the UK seek to accomplish with the EU in relation to your industry or policy area in the short, medium and long term?**

So far we have confined the answers to road haulage market access, but the reality is that there are many other areas that need to be addressed to improve the TCA.

The area with the largest problems encountered so far when crossing the border between the UK and the EU has been the movement of plant and animal products. Problems with Sanitary and Phytosanitary (SPS) checks & bureaucracy has become most apparent in recent weeks.

The relationship between Great Britain and Northern Ireland and the rules in place governing the movement of SPS goods are not fit for purpose for an internal border. The rules are designed to protect the EU single market, what they don't do effectively is allow a fully functional internal relationship between Great Britain and Northern Ireland.

Major simplification and rationalisation of the rules for the Great Britain – Northern Ireland transport of plant and animal goods should be an objective for all, for the UK, Northern Ireland and Irish Governments as well as the European Union.

Our view is that the benefits of the current restrictions are far outweighed by the costs imposed by the current rules.

We are seeing increasing evidence of issues arising from rules of origin, at this stage it is very difficult to be exact because so many people are dealing with new rules with which they are unfamiliar. It may be the case that this will bed-down over time as people become familiar with the complexities and limitations imposed by the rules, it is something that will need to be watched and assessed over coming months.

Finally, the RHA would just like to say that the logistics industry is focused on serving its customers to the best of its ability. In essence that means we have to work within the rules and laws provided to us. Where we see unnecessary and disproportionate problems we will raise the issues appropriately, but we also recognise that the relationship between the UK and the EU has changed and we as an industry, along with our customers, have to change and adapt to the new regulatory environment we find ourselves in.

We recognise that wholesale change to the TCA is an unrealistic aspiration, but that should not prevent us all seeking improvements. An evolution of the TCA should be possible. The TCA, and indeed the Northern Ireland protocol, should be viewed as living documents, adapting rules and regulations over time to deal with the practical problems we face for the benefit of all parties.

Thank you for this opportunity to comment should you require any further information will have any supplementary questions at all please do not hesitate to contact me and I will do my best to respond fully and quickly.