Safety and Security Declaration Requirements from the EU Q&A

Submission Requirements

Q 1. Does transit through the UK require a Safety and Security (S&S) declaration (e.g., EU - UK - IE)?

Yes, an entry summary declaration (ENS) is required for transit through the UK.

For outbound transit movements, no exit summary declaration (EXS) is required where goods are moved through Great Britain under transit and an entry summary declaration (ENS) has been made within 14 days of arrival

Q 2. Is a separate S&S declaration required for personal effects, vehicles, and specific regimes like ATA Carnet, TA, IP, or OP?

Generally, personal effects and vehicles are exempt if not being moved under transport contract.

You do not need an ENS declaration for goods moved under an ATA or CPD Carnet unless they are being moved under a transport contract.

A transport contract, or contract of carriage, is an agreement between a carrier and shipper or passenger, setting out each party's duties and rights. This can be a verbal or written agreement.

Q 3. Can amendments be made to data after submission?

Yes, amendments can be done up to the point of arrival at the GB border.
However, declarations cannot be cancelled - if the goods will no longer be shipped, it is not necessary to inform S&S GB. (https://www.gov.uk/guidance/safety-and-security-requirements-on-imports-and-exports)

Q 4. What are the time frames allowed for cross-channel services in ENS submissions?

For Ro-Ro, the time the ENS must be lodged is 2 hours before arrival at GB for ferry crossings, or 1 hour before arrival at the Eurotunnel terminal in Coquelles (France). (https://www.gov.uk/guidance/making-an-entry-summary-declaration)

Responsibility and Compliance

Q 5. Who is legally responsible for creating the S&S declaration (e.g., haulier, carrier, train operator)?

The legal requirement to submit a declaration lies with the carrier. This is the operator of the active means of transport on, or in, which the goods are brought into the UK.

However, the responsibility for ensuring that the information provided is accurate lies with the party submitting the entry summary declaration. (https://www.gov.uk/guidance/safety-and-security-requirements-on-imports-and-exports)

Q 6. Are import clearance agents required to ensure an ENS is raised?

It is the carrier's responsibility to make sure that the declaration is submitted within the legal time limits.

Commercial terms and conditions can be used when arranging for a third party to file on the carrier's behalf. This may involve amending an existing contract or creating a new one.

Q 7. Will liability work in the same way as Direct Representation does with regards to import declarations if an agent takes on the submission of the S&S declaration?

No, the customs direct representation framework is not applicable to Safety & Security declarations. The submission of the S&S declaration by a third party will be based on commercial decisions and agreement between the carrier and the declarant.

Q 8. How are carriers' compliance and completeness of declarations ensured (e.g., MRNs on GMR)?

The current compliance approach for Rest of World traffic will be extended to include EU traffic

Q 9. How are conflicts between GVMS and S&S handled?

It is currently optional for S&S movement reference numbers (MRNs) to be included in the Goods Movement Reference (GMR). S&S GB is a completely separate system that does not talk to the Goods Vehicle Movement Service (GVMS).

Q 10. Under what conditions can the S&S declaration requirement be waived, and how to apply?

The requirement to submit S&S security declarations from the EU is waived for all goods until 31 January 2025. No application is required

From 31 January certain goods will not require an entry summary declaration. See the below links for the list of goods:

https://www.gov.uk/guidance/making-an-entry-summary-declaration#goods-that-do-not-need-an-entry-summary-declaration:~:text=Vatican%20City%20State-,Goods%20that%20do%20not%20need%20an%20entry%20summary%20declaration,-You%20do%20not

https://www.legislation.gov.uk/eur/2015/2446/article/104

Q 11. What happens if S&S isn't updated before arrival?

The relevant authorities will engage with carriers when non-compliance has been identified to rectify that position.

Q 12. Will the release of S&S reduce customs stops?

Once implemented, Safety & Security declarations on EU imports will bring an important source of mandatory, pre-arrival data to assist Border Force in identification of the

highest risk traffic to detect high harm goods, and support the facilitation of legitimate traffic.

Q 13. Is there a system to ensure S&S data matches CDS entry data?

There isn't a direct automated system. Agents and carriers need to coordinate data accuracy manually.

Q 14. Is an individual ENS declaration required for the whole trailer or per individual consignment on a vehicle?

HMRC are aiming to provide clarity on whether/when multiple consignments can be included in one ENS declaration as soon as possible.

Q 15. Do Simplified Customs Declaration Procedure & EIDR allow post-arrival S&S submissions?

No, ENS declarations must be submitted before the goods arrive in the UK.

The Customs Declaration Service (CDS) has no role with ENS declarations, this is a separate system that does not talk to S&S GB, so information from the customs declaration can't be shared for the ENS declaration. Similarly, whilst it is optional for the S&S MRN to be included in the Goods Movement Reference (GMR), S&S GB is a separate system that does not talk to the Goods Vehicle Movement Service (GVMS)

Q 16. Will there be example entries or test environment available before the go-live date?

Traders can use the S&S declaration completion guidance to assist with the submissions.

Test environments may be available via the commercial software, please check with the software provider.

Q 17. Is there an email address for the ENS helpdesk?

In exceptional circumstances ('force majeure'), contact HMRC Import Control System helpdesk immediately for advice on next steps by email: ics.helpdesk@hmrc.gov.uk