



Northern Ireland  
Chamber of Commerce  
and Industry

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# Timeline so far...

- June 2016: UK votes to leave the EU in Brexit referendum
- UK Government commit to departure from the EU Single Market and Customs Union
- EU and Irish Government redline – no hard border on island of Ireland
- NI Protocol, January 2021 - an attempt to deliver retaining NI's access and interdependence on two markets (EU and UK) whilst exiting the EU customs union and single market
- Windsor Framework 2023 – a liberalisation on prohibitions and restrictions under the NI Protocol subject to additional EU safeguards. Key aspect – grounds for building trust for the future relationship

# Windsor Framework Recap

- Formally adopted by both parties on 24 March 2023
- UK – “fundamental amendments to the legal text”
- EU – “Within the Framework of the Withdrawal Agreement” within the powers of the Joint Committee
- Changes to the Protocol included customs, movement of goods, VAT & excise, medicines and governance

# Key dates 2025...

**1<sup>st</sup> May – new arrangements for movement of goods from GB to NI by parcels or freight**

**1<sup>st</sup> July - Expansion of 'not for EU' labelling... stage 3 comes into effect**

**Additional food and retail goods must be individually labelled incl. composite products (not shelf stable) or require sanitary or phytosanitary controls**

**31<sup>st</sup> December – End of Veterinary Medicines Grace Period**

**By this date, the UK must ensure that supplies of veterinary medicines to NI conform with EU law and provisions of the WF**

# New Arrangements for GB-NI Parcel Movements

- If you're moving parcels from a business in Great Britain to a business in Northern Ireland, you should be ready by **1 May 2025** for **new parcels arrangements** under the Windsor Framework to take effect.
- The **new arrangements will differ depending on the sender and recipient** with **different processes for business and consumer routes**.
- There will be a **new consumer route** and UK businesses sending parcels to consumers for personal use in Northern Ireland do not need to be registered for the UKIMS to use the consumer route arrangements.
- There will be **weight limits in effect for the consumer route** (up to 100kg per package for a single item or 31.5kg per package if the consignment is made up of multiple items).

## B2C/C2B

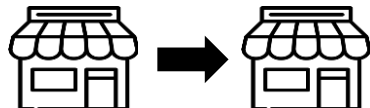


No individual customs declarations, Safety and Security (S&S) requirements or duty.

UK businesses do not need to sign up for the UKIMS  
UK businesses should provide standard commercial information to their carrier.

- **Business-to-business (B2B) parcels movements will be eligible to use the simplified processes for internal market movements (SPIMM)** where the sending or receiving business for the movement holds a UK Internal Market Scheme (UKIMS) authorisation and the goods meet the criteria to move as "not at risk" under UKIMS.

## B2B



Eligible goods moved in B2B parcels can move under the UK Internal Market Scheme (UKIMS) with a reduced dataset and no duty.

Credit: HMCR

# Expansion of 'not for EU' labelling

- 30-day transition period – Goods already on the market will not need to be re-labelled and can be sold during transition period. Phase 3 products that were moved into NI before 1 July 2025 do not need an individual product label until 31 July 2025

## Products that require individual labels:

- Pet food
  - All pre-packed and sealed fruit and vegetables
  - All fresh, frozen and processed fish
  - Other POAO – eggs and honey
  - All chilled or frozen composite products and some chilled plant products
  - All shelf-stable composite products
  - High risk food of non-animal origin
- 
- Exemptions available at gov.uk website [here](#)

# Analysis

- Impact “Longer term/ big picture” as opposed to “day to day”
- Manufacturing movements likely to remain “red lane” heavy
- Access to GB Products
- The Labelling Conundrum
- Stormont Brake v Dual Market Access
- Macro picture – relatively positive on exports and growth, but GB's external challenge is our internal market challenge
- Longer term impact – regulatory divergence, global trade war, and impact of final implementation phases
- Direction of travel in the reset key

# Now... UK-EU Reset

New actors in the process – New look European Parliament, Commission, UK government and member states

First meeting VDL Starmer Meeting, 2 October 2024

Key takeaways from joint statement

- Full and faithful implementation of existing agreements
- Agreed the UK and European Union would *“continue to work closely to address wider global challenges including economic headwinds, geopolitical competition, irregular migration, climate change and energy prices, which pose fundamental challenges to the shared values of the United Kingdom and the European Union and provide the strategic driver for stronger cooperation”*
- Stable, positive and forward looking

# Windsor Framework and the Reset..

Murphy Review underway – reporting in July on

*“on the functioning of the Windsor Framework arrangements and its implications on social, economic and political life in Northern Ireland”*

*“Where the Review identifies issues or challenges attributable to the current arrangements, it shall also provide practical recommendations to the Government on how these issues may be addressed.*

*Recommendations should reflect the context that the Windsor Framework is an international commitment to which the Government has committed to implement in good faith.*

*In making recommendations to the Government in its report, the Review must give consideration to and set out how any recommendations: that account for the wider UK-EU trade relationship, and relevant or prospective developments within it, to the extent it is relevant.”*

# US Tariffs - Windsor Framework implications...

Keep a close eye on both UK and EU responses. If EU response includes safeguarding measures, imports into NI are “automatically at risk” insofar as they apply to the same goods entering the EU

- What we know so far....both open to negotiate but prepared for all eventualities, EU likely to move first on 1 May package (retaliation on steel and aluminium on next slide)
- *“Our intention remains to secure a deal. But nothing is off the table”,*
- UK Prime Minister, Sir Keir Starmer, 3<sup>rd</sup> April
- *“...we have offered zero-for-zero tariffs for industrial goods as we have successfully done with many other trading partners. Because Europe is always ready for a good deal. So we keep it on the table. But we are also prepared to respond through countermeasures and defend our interests”*
- EU Commission President, von der Leyen, 7 April
- Limited Options – Duty Reimbursement Scheme and Customs Duty Waiver

# EU Retaliatory Response

- EU final package of tariffs
- What we do know –
  - EU 90-day pause on retaliatory tariffs
  - More hesitation to publish product list given volatility of situation
  - EU still assessing how to respond to automotive and other levies
- If EU countermeasures kick in, it is expected -
  - U.S imports to be tariffed will include, maize, wheat, barely, rice, motorcycles, poultry, fruit, wood, clothing, dental floss, almonds and soy beans
  - Tariffs will enter into force in 3 stages – a few months apart (previously expected April – May - December)
  - Pharma sector urged to prepare for duties

# Duty Reimbursement Scheme..

NI Chamber is well informed of the limitation of this scheme and has been pressing HMG to make the case that it is inadequate, unduly bureaucratic and disadvantages SMEs

At present, the importer for the original 'at risk' movement into NI or an authorised agent or representative acting on behalf of the importer can make the claim

Grounds for a claim:

1. Physical retail sale or goods intended to be sold by physical retail sale in Northern Ireland.
2. Onward movement from Northern Ireland to Great Britain.
3. Export from Northern Ireland to a location outside of the UK or the EU.
4. Final consumption in Northern Ireland.
5. Permanent installation in Northern Ireland.
6. Destruction in Northern Ireland.

Additional bureaucracy for claims relating to goods subject to a defence measure

# What it means in practice today..

- De-escalates country of origin question, circumvention of differentials country to country unlikely
- For 90 days – but if in doubt, use the next 90 days wisely!
  - Map supply chains
  - Clarify origin
  - Assess exposure to non-EU imports and monitor global oversupply
  - Consider limitations of available mitigations



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# Thank you.

