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Attendees

First name	Surname	Company
Aaron	Turrall	FSi Ltd
Alastair	Gardner	DIT
Alison	Hill	Lomon Billions
Caroline	Simpson	Colourscapes
Clara	Ritch	3M
Clive	Foster	DCL
Colin	Pratt	Colin Pratt Consultant
Emily	Jones	Axchem
Janet	Greenwood	TT Environmental
John	Parkes	Barkwith Associates
Julian	Sarkar	Zanos
Karen	McAvoy	Amox Chemicals
Kevin	Moeyens	Lubrizol
Lee	Walker	Ralken Colours
Lydia	Moi	DIT
Marie	Keane	Lakeland Labs
Michael	Cooper	CBA
Mick	Goodwin	WSP
Neil	Hollis	BASF
Oliver	Pfefferkorn	Colourscapes
Peter	Godfrey	CEA Research Associates
Steve	Marks	Airedale Chemicals
Suzanne	Alecrim	Pricecheck.com
Stephen		Vickers Laboratories Ltd
Vicky	Oakes	Oleo Solutions Ltd
Vidyut	Mehta	Roha Group

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1 Introduction, reminder of group rules

Mick Goodwin

As always, just a reminder of the rules: it's a self help group for industry.

There's no such thing as a silly question we are all here to, to help support one another. We all come from different backgrounds, different perspectives have different experiences and we're here to share that and help each other learn and progress our businesses. Yeah, no such thing as a silly question.

We have a few guests today. Michael from the Chemical Business Association, Lydia from DIT and a few others as well. I've not written down everybody's names I do apologize. As always, please keep yourself on mute. If you want to contribute something to say, use the wave hands symbol thing, or just wave or put something in the chat, we'll try and pick it up. I'll try not to miss anybody. But if, if we're all here. We will start unless I've missed anything, Janet, we'll start with.

Janet Greenwood

No, we're fine, Alistair is just signing in from DIT as well so that's excellent.

2 Vicky Oakes issues

Mick Goodwin

Have we got Vicky Oakes, we have got Vicky. Do you want to start with your experiences Vicky.

Vicky Oakes

2.1 Removal of VAT triangulation

Yeah, We've had to, obviously find some workarounds for some of the challenges we faced this year and some things were a bit more complicated than we anticipated, and the first issue that we've had has been the removal of the VAT triangulation simplification which means as a distributor if we collect EU origin goods in Europe and we deliver them to another European country or the same European country, we have some VAT obligations now in that country and need a registered VAT office to claim any VAT payments back.

And that obviously makes things a little bit more difficult if you're not a EU registered entity which I'm sure is what a lot of people are familiar with.

2.2 Third party duty for goods sourced from South-East Asia

The second complexity we've had which has become more apparent due to all of the shipping issues we've been faced bringing goods from Southeast Asia, is that if we source material in Europe we bring to our UK warehouses, and then we need to supply European customers with our European origin goods, then they are liable for third party duty again which at the moment because supply and demand is so tricky.

I think these 3% 5% 4% they're not really business critical, but I'm sure once the market simmers down and the visibility on prices becomes a lot more apparent because at the moment we're faced with massive increases in raw material costs, massive increased in shipping costs, there's room to hide.

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Not that we're purposely trying to hide, but I don't think customers have visibility, they just need material and they need it quick. So I think that'll be something that probably affect us a bit a lot more longer term in terms of those additional costs.

2.3 Hauliers issues

And then the third thing from our side is the hauliers. We looked into take DDP bookings and the complexity of groupage movements to Europe, mainly because, as you can imagine it there's 26 pallets on a truck, and one of them is ours, there's a lot of possibility for document issues with the other 25 pallets or even our pallet maybe holding somebody else up.

I mean I think those things seem to be ironing themselves out in, in terms of document issues, but I think hauliers are trying to take control of the minimum number of contacts by refusing to use either our clearing agents or our customers clearing agents or wanting to look after that themselves. But then reinvoice those costs back to people.

So we're offering on DAP rather than DDP, which is actually just another thing that we seem to have come across. So that was the sort of challenges we've faced this quarter. And I think will continue to be challenges going forward.

Mick Goodwin

Has anyone else experienced similar issues? Go on Suzanne.

3 Suzanne Alecrim experiences

Suzanne Alecrim

Yeah, we've hit all those sorts of issues as well.

3.1 Using legal entity in Belgium to supply the EU as a whole

We do have an entity set up in Belgium. We started off merrily trying to ship from the UK out to European customers and we've returned probably about 20 consignments because we can't get through the Customs for regulatory reasons.

Although we've got EU alignment, each country, each member state, is asking for something above and beyond.

In particular, we've been levied with excise tax on our denatured alcohol, even though it is denatured, So we've had to bring things back to the UK.

We've now got probably 80% of our European shipments going by Belgium where we haven't got that issue.

3.2 Using a single trailer instead of sending individual consignments

And what we're doing is we're hiring a trailer and filling it with all the different consignments, sending it over to a warehouse in Belgium where it's going to do the customs clearance, and then we're shipping onward to those other countries now the goods are in free circulation, or we're making the goods available for customers to come and collect.

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We have factored all the costs of the duties in, but because we're only shipping everything with one trailer we've only got one entry on with having lots of combined entries.

3.3 Freight forwarders taking things into their own hands (with example)

And as Vicky just said, all the agents are at the forwarders are definitely taking (things) into their own hands. They don't want to use customers own customs agents, because they don't think they're going to clear it in time.

I have got an incident, which started at the end of January where we actually did an import from Spain, bringing it to the UK.

The supplier didn't want to do the export entry, he was insisting on ex works but we were trying to tell him it had to be FCA because we couldn't clear it out of Spain.

We ended up with two entries he, in the end did one, which we then closed ours off and got a fine from Spanish Customs for having a second entry raised.

We then found out that actually this export entry he raised never got closed when it got presented at Calais, and he is now liable for the VAT on that export to us to try the total of about 8000 euros.

We then found out that the import entry done by again another company, not related to the freight forwarder has done the import entry wrong.

So they've done it in the name of the warehouse that we've picked up from rather than the name of the consignor, so we're now working with them to speak to HMRC to get it amended so that he can hopefully present it back to Spanish Customs and actually get the VAT refunded, but it just shows the importance of making sure that we do understand exactly what is happening at each stage of the supply chain, that you do know who the agents are, who is doing the clearance, and that you do try to get that responsibility.

I think they started off when they first did the Brexit.

Oh, you can go on the training, you can learn how to do all the entries yourselves, but it does have a knock on effect because the export entry leads to the transit document, that then needs to be used on the other side to close off when they do the import and you're only raising the export entry, you're not involved in the transit document that's what the forwarder will do so they'd like to be able to do all of it all the way through.

So yeah, it's definitely been challenging and finding different ways of working and as I say for us, the only way we can work is to take the pain out of it for customers and route it into Belgium.

3.4 Costs increase because of changes

The goal to increase circulation so customers can buy from us, knowing that we're in compliance with the regulations, we've taken up the Customs for us, but it's probably increased the cost of our products by 15 to 20%. And so sales are currently down because we look way too expensive compared to European competitors.

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3.5 Vicky Oakes experiences with using EU legal entity

Vicky Oakes

We do actually have an EU entity in our group of companies and we've been encouraging our customers to set them up.

We're obviously then having to get our suppliers to set them up as a customer as well which isn't always as straightforward due to the complexity of distribution agreements and agency agreements and then commercial sensitivities and there's always overlap I find with our Principals agree yes you can find that customer because the buyers UK based and they have a factory in France and it's all part of you supply the French factory, you supply the UK factory and it's one negotiation, but it isn't as straightforward anymore.

At the moment as a distributor I feel like we're asking our customers to do a lot of work to help us spend time and money and our job has always been to take the pain away from them.

And it's not been easy this year, I think to rely on that goodwill and say, you know, this is in your best interest. I know it's extra work, it's difficult, we have to change the terms of our offers.

It's a nightmare really.

Mick Goodwin

Julian, did you want to come in.

4 Julian Sarkar experiences – double duty

Julian Sarkar

Um, It's all of the above, I think, basically what everybody's said so far is exactly the same as what we're experiencing.

On average, we're paying or we're charging an extra 75 euros additional documentation, which actually doesn't always cover the costs anyway, even for a small, less than five kilos shipment for an essential oil coming from France. It could be anywhere from 75 euros, 75 pounds.

The DAP issue's, a real pain because customers don't like to buy DAP they're used to buying DDP.

Alternative sources may have the options of DDP, which is going to be preferred on every occasion. Because it takes out the burden of extra responsibility away from them.

What we are doing is to try and avoid this double duty problem for certain goods that have been buying from China through Germany is bring, either straight in here, or just try and persuade our people to import them into Germany on an In-Bond basis and then bring them in and paid duty here, but again you're talking about an extra Customs clearance charge.

It's just an absolute pain to be honest, and we are routing things more and more through the Dutch company we set up, as we're having to, because that's just the way it's going to be and to be honest, it is a lot easier to do business through Holland than it is to the UK at the moment, even for general UK business it seems.

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I don't know what the best, because I'm not personally directly involved in doing the paperwork, thank goodness, and all the entries but it's crackers.

But we're experiencing exactly the same as everyone's already said, VAT, et cetera et cetera.

And depending on the nature of the transaction, we accept or don't accept it and we'll turn business away.

Mick Goodwin

Has anyone else similar experiences or different experiences they want to share anything they want to add.

I guess the follow up question kind of leads on to the next item on the agenda is Rules of Origin, how is that the change in determining Rules of Origin is, is how much of an impact is that as well. Anyone have anything on Rules of Origin.

5 Rules of Origin

Janet Greenwood

I'm going to hold my hand up here and say, we have had several people in the group, who've had specific rules of origin questions which then BEIS have very kindly answered and it's just a sort of mopping up.

Is everybody happy with their Rules of Origin, or do people still have problems?

Mick Goodwin

Go on Caroline, you're on mute,

5.1 Mechanical Processing offers a way forward on Rules of Origin

Caroline Simpson

I'm just trying to press the button! I think it's just for assurance from my point of view. We have determined that if there's some sort of mechanical process done to something in the UK, that we can claim UK origin.

Whereas previously it was done on the value of the goods put in the product so I just wanted to make sure that I've got the right end of the stick there: that if you're bringing something in, doing a mechanical process to it, even though chemically it's not changing, you can claim UK origin now. Is that correct?

Mick Goodwin

I believe so. My interpretation of it was that the processes that you could, you could do to substances were more stringent under the old regime and you had to do more than you do now. And so you kind of defaulted to the Value Add Rule.

Whereas now if you're mixing, blending that counts as UK, I think. That was that was my interpretation of it, I don't know if anyone else has seen that as a simplification?

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Lee Walker

Yeah we are one hundred percent now that that is the case from what we can. You see its in the very lower end of the wording but yeah "any mechanical processing". Yeah, yeah, pretty much.

Caroline Simpson

That's how I read it.

Clive Foster

Yeah, I was just gonna say that I thought you had to do something more than just mixing you had to have some special piece of equipment but a high shear mixer, for example would be a special piece of equipment, but I thought there had to be something.

(Lee) Yeah, that's correct,

(Clive) that's other than blending.

(Lee) Yeah, it has to be like milling, greasing, you know, It's not just a fork, I suppose.

Caroline Simpson

Mechanical dispersion. So, change of particle size, something will count as far as I understood it.

Lee Walker

Yeah, pH, anything like that I think rheology, viscosity, all these things combined together.

So yeah we for what we do, for certain, but I think you'd have to be doing something very simple for it not to count is how I read it with all the points that are included in the document

Caroline Simpson

I read it that if you were just adding water to something that wouldn't count,

Lee Walker

No, stirring water and a spoon, 2% water and stirred with a spoon, you might not get away with it but I think most people are doing more than that,

Caroline Simpson

Thank you.

Janet Greenwood

Right, is there (just not knowing anything about these kinds of rules), is there a specific bit, which defines what the processing is then, Lee, maybe could you send that document through to me.

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Lee Walker

Yeah, we've got several, I'll send some through.

Janet Greenwood

That's great, thanks.

Mick Goodwin

It is in the free trade agreement, I can't remember what annex or whereabouts but it is in there and it's more detailed than it used to be, I think, isn't it.

Lee Walker

Yeah. Well, originally we weren't too sure ourselves because, like, Caroline was saying we, we didn't know whether it was just down to percentages of powder in the final product, which it has been in the past, but again that was always loose that was never understood fully, if that makes sense.

But the new wording has so many things in there, we were ticking them off saying oh yeah we do that, we do that, we do that, and then at the very end, the mechanical thing was the final confirmation for us, because now we do definitely more than just the simple stick stir, if you know what I mean.

Mick Goodwin

Yeah, Lydia's put the extract into the chat there.

Lydia Moi

The list of simple processing beyond which any processing needs to go beyond the processes listed here. And then there's just a final, kind of, I don't think it's copied onto there but it says, an operation is considered simple if needed special skills nor machines or equipment are needed to carry out those operations. So there does need to be a level of skill and expertise to these kind of processing operations.

From chat:

List of simple processing beyond which any processing needs to go beyond the processes listed here

preserving operations such as drying, freezing, keeping in brine and other similar operations where their sole purpose is to ensure that the products remain in good condition during transport and storage;

- breaking-up or assembly of packages;
- washing, cleaning; removal of dust, oxide, oil, paint or other coverings;
- simple painting and polishing operations;
- sharpening, simple grinding or simple cutting;
- sifting, screening, sorting, classifying, grading, matching including the making-up of sets of articles;
- simple placing in bottles, cans, flasks, bags, cases, boxes, fixing on cards or boards and all other simple packaging operations;
- affixing or printing marks, labels, logos and other like distinguishing signs on products or their packaging;

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- simple mixing of products, whether or not of different kinds; mixing of sugar with any material;
- simple addition of water or dilution with water or another substance that does not materially alter the characteristics of the product, or dehydration

Mick Goodwin

Cool, thank you for that. Yeah. Does anyone else, anything on rules of origin or, or other trade experiences, before we move on?

5.2 Is the UK a member of the PEM Convention?

Kevin Moeyens

I do have a question.

Is the UK, also a member of the PEM convention, the Pan Europe Med convention?

I have many questions, I read somewhere that in the trade deal with Europe, that UK considers all European materials as UK materials. When we are doing business with other free trade agreement countries, for which the UK has a free trade deal signed.

That was for me consider that we are part of the, the PEM convention which is the old Barcelona Convention, but I can't find any information around it so I don't know if anybody here knows that.

(JG – PEM convention webpage is here:

https://ec.europa.eu/taxation_customs/news/pan-euro-mediterranean-convention_en

and its cumulation rules are here:

https://ec.europa.eu/taxation_customs/business/calculation-customs-duties/rules-origin/general-aspects-preferential-origin/arrangements-list/paneuromediterranean-cumulation-pem-convention_en).

Mick Goodwin

Can one of our guest experts comment on that or anyone else? Go on Suzanne.

Suzanne Alecrim

Yeah, that's something that we've looked into because we're shipping to countries like Norway or Sweden goods of EU origin.

We thought that there would be, especially with the wording in the statement on Origin, they did sort of say United Kingdom or the Union.

So we were at the beginning, shipping with both of those on, thinking we could use that.

But it isn't the case, we're only able to actually benefit if we are shipping goods of UK origin to those countries that have an agreement with the UK or if they've got some sort of pending agreement that's being worked on at the moment.

So going into Europe is writing the statement on origin but most of the other countries where we've got that agreement in place like Norway or Switzerland or South Korea and we have to issue a UK EUR1 document, but it is only for goods of UK origin, and if you had goods say of Vietnamese origin that you wanted to bring in where we may have had an agreement with Vietnam and then you ship to Europe.

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That is definitely not working, unless you're using it for the origin, where you're using cumulation, but not to sort of buy it outright and send it across, because they've got that agreement they can benefit

And again, that's something that's affected our customers. So they're asking us to use Returned Goods Relief.

But when you do that you have to submit your very original export documents out of Europe. So when our suppliers shipped to us from Europe, that document that they've submitted to Customs, is what we need to present to Customs for it to go back in.

So of course we can only do that really as a return back to a supplier because you're not going to give your pricing information to or supplier information to your customers.

But that seems to be the only other way to sort of zero rate anything going back, is if you have that evidence of it actually exporting out but at the moment, there definitely isn't any alignment or agreement with anyone who's got other arrangements from what we've found out,

Lydia Moi

I was just going to add that each Free Trade Agreement will have its own specific rules on cumulation.

And so obviously they'll be determined by what's written in that particular trade agreement and I think with the European DCA, and I don't know if this was part of the original question, but the rules on cumulation are that EU originating goods can be considered UK content, if part of the manufacturing process.

So if you're manufacturing something in the UK and using goods, raw material sourced from the European Union, they can be considered as if they were UK originating when we're exporting those goods.

I'm not sure if that was the original question actually, I don't believe we are part of the Pan European group anymore.

Kevin Moeyens

Okay, there's sort of two questions in detail. All right, no Perfect, thanks, thanks Lydia.

Mick Goodwin

Anything else on on Rules of Origin. Whilst we're here.

Okay so we move on to the next item, organic pigments from Colorscapes. Was this Oliver? Caroline?

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6 Tariff codes for organic pigments

6.1 Query from Coloursapes

Oliver Pfefferkorn

Both of us I think. And, yeah, we have the situation that a lot of our pigments fall under a certain commodity code, and I searched on the HMRC website like three weeks ago, again, and I found a footnote saying that basically all under this commodity code has zero duty because of autonomous (indecipherable) suspension, then a week later there was added another footnote, saying, only a specific pigment is duty free, and also preparations from it.

And the other footnote said this does not apply to preparations so there was a contradiction in it. That was something.

First of all, I don't know how often they are updating the website why before everything was duty free as I read it, all of a sudden it's only one pigment.

Is that something commonly happening that they updated within the year, I'm not familiar with that.

And then Julian made a comment on another question I had about in bond, bonded warehouse, where we bring in goods from India, China into Europe first, and then ship it always to UK and my question was if it then attracts another duty, based on the origin, which is yes, but if we bring it into Bonded Warehouse.

I guess if it's not Customs cleared so it would only attract the UK import duty. That was the two of my questions basically yeah.

Julian Sarkar

That's right, exactly right.

It does incur extra costs because you've Customs clearance potentially twice or additional storage, additional documentation, but it's either that or double duty.

And sometimes it's not clear what the duty rates are sometimes they're 0% in both cases, but not always.

Oliver Pfefferkorn

Yeah I know. And as I said three weeks ago I would have said everything is duty free until end of this year, according to the website, and then a week later there is another footnote saying, oh no it's it's only 4 the specific pigment which has changed the picture completely.

It's not a problem, we just want to make it right, just want to do it right, that's the thing.

And, of course base our calculations on these costs. Shipping, like you said maybe five kilos we're shipping a little bit more so another clearance of seventy five euros is not killing our business, it's still a cost, but you need to be aware of.

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Julian Sarkar

Yeah, these are some of the small businesses where the essential oils where it does really make a difference. Stuff, as you say it's, you absorb the charges.

Vicky Oakes

But we are actually bringing some goods from the States to Europe that we're keeping in Bonded Warehouse before we bring to the UK and we're finding it's not just the customs clearance charges as well.

The transport into the UK has to be under Bond so that's a specialist haulier provision service which it probably won't break the bank because the costs aren't huge, but it is an additional cost based on what you normally would attribute from like a Germany to UK.

And there is additional costs and the task to be specified and where they clear, where they break the Bond in the UK, you need a license to be able to do that in the whole year, so will obviously charge to cover those services that they're providing.

Oliver Pfefferkorn

Right, yes. It's,

Julian Sarkar

It's basically all cost. A little bit here, a little bit there. It all adds up.

Oliver Pfefferkorn

Sure. As always. I was actually emailing HMRC directly to get guidance from them. I was surprised to learn that their response was basically "Well, I'm support here but I'm not supporting you and I can't support you understanding the system, I can support you in finding the information". So that was no help whatsoever so I was hoping anyone here could help or give some comments.

Julian Sarkar

Unfortunately a lot of the HMRC people are new and don't know

Oliver Pfefferkorn

Well, I'm not blaming the individual person, but he was, he or she was speaking, you don't even know whom you're emailing with speaking for them so I don't blame the individual person never so

Janet Greenwood

I think, Oliver, what we might be able to do is to take your specific question which you emailed through to me and send that through to BEIS and see if we get you a response that way rather than going through HMRC because we have found they're (BEIS) very helpful on specific questions.

Oliver Pfefferkorn

Thank you. Thank you very much, they will appreciate that. Yeah. Good.

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Mick Goodwin

Thank you.

6.2 When will tariffs change?

Caroline Simpson

Can I just ask though, Oli's obviously been checking the tariff codes regularly and there seems to be changes, would that be normal, would we expect that the codes will change?

Is it something we need to keep an eye on, you would assume that once the UK tariffs have been announced that they'd be fixed for certainly six months if not 12 months.

We don't want to be having to check them every time we're making a delivery or checking to see if they've changed footnotes regularly.

Does anybody have any experience as to how often we would expect these things to be changed? (silence) I guess that's a no!

Suzanne Alecrim

So I'm shipping consumer products and we thought we had shower gel set down, we've actually since January changed the tariff code for that three times, because the description's changed every time we've gone in.

We also find that our counterparts in Europe, the descriptions are slightly different now so they're trying to put things under different tariff codes.

I'm trying to bring some simple facial wipes in at the moment, and they're putting it down, there's an essential oil tariff code, but I've actually got a soap and detergent type code that's zero rated.

But if they put their tariff code on their paperwork, and I bring it in here, I've got to have the same code, their code is six and a half percent of mine is zero rated so of course they're gonna think I'm trying to dodge.

So we now have to pay six and a half percent because in Europe they're refusing to take that code off. B

ut I also was really surprised because as you say, when they issued it last year the UK tariff I thought this is brilliant, it's nice and easy, we know what we're doing. And as I say, we are doing a double check as well just to make sure if there's any changes

Mick Goodwin

Michael come in there. Yeah,

6.3 Sign up for Tariff Code updates

Michael Cooper

I was just gonna say yes the tariff code can have changes on a fairly regular basis, but obviously the code is so vast that individuals might not see any changes to their own tariff code for a long period of time but you can sign up for an alert system with HMRC.

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JG note: "To stop getting the Tariff stop press notices, or to add recipients to the distribution list, email: tariff.management@hmrc.gov.uk."

They'll tell you fairly regularly when any number is changing within the code, might be worth looking into.

And, Suzanne, did you just mention there an issue of tariff codes that your supplier is using?

6.4 Binding Tariff Information

Suzanne Alecrim

Yeah, so we've got a Dutch supplier, that's trying to use an essential oil tariff code for for facial wipes.

But there is actually a tariff code attached to any nonwoven fabric that contains a soap or detergent for cleaning purposes, which fits the product.

So the only way to get them to use our tariff code would be to apply to HMRC for Binding Tariff Information so we've been looking into that for a number of our products to try and get them fixed.

Michael Cooper

Yes, that might be well worth doing because I was going to mention that it's the important, you know, UK that has the liability to make sure they're using the correct tariff code regardless of what your supplier abroad might choose to be using.

Suzanne Alecrim

Yeah, but we're finding that the agents will not not accept it, especially if our tariff code is zero rated, and the tariff code that the importer has put on their paperwork, means it does warrant duty when it comes in here, because it looks like we're avoiding duty, but the mismatch when...

Michael Cooper

If you're using the correct code. It is zero then obviously that's the correct thing to be doing. And so I guess it depends who's paying the clearing agent, and whose instruction, they are taking.

Suzanne Alecrim

Yeah. I think so i think so many of the customers agents are new and haven't got experience really.

So they're just literally taking it at face value and whatever they have been told to do.

So "all paperwork must match" for example. And then that's why they'll just say "no we can't do it, it doesn't match" as opposed to the real reasons why.

So we were told the only way to actually confirm it would be to have that BTI in place.

Michael Cooper

That does sound like a very useful approach. Yes, yes.

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6.5 Use CAS number to find a Duty Rate – EU facility

Mick Goodwin

Julian, you've got your hand up.

Julian Sarkar

Yeah, could I understand something on this because the EU used to have a very good search facility where you could put in a CAS number to find a duty rate for a forthcoming tariff heading and duty rate for a given country.

This seems to no longer be the case I don't know if anyone else has experienced that.

Secondly, I used it also to cross refer the tariff codes, EU onto the UK website, and generally I've found that the two sets of tariff codes, providing you've put in the full code, do agree.

The duty rates are obviously different but they do agree in terms of the tariff code, with very few exceptions in my experience.

But has anyone else use that CAS number for search facility recently?

Oliver Pfefferkorn

Not recently, no.

Michael Cooper

Yes, I've had a look at that system, it is a useful website.

Not every chemical is present in the website but if you put a CAS number in, it will tell you what the tariff code is within the EU, and obviously then that's a good starting point for looking at UK tariffs.

I think the website has changed recently which may be why any existing links are no longer working. But I can try sending the web site address for that.

Julian Sarkar

Yes you could send a new one, that'd be good because if you look on this database search it just gives a form to fill in.

Kevin Moeyens

I added it on the on the chat, maybe can try it, yeah.

https://ec.europa.eu/taxation_customs/dds2/ecics/chemicalsubstance_consultation.jsp?Lang=en

Alastair Gardner note: The ECICS site does change CAS number to HS Codes

Julian Sarkar

Oh yeah, yeah. Good. Yeah,

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Mick Goodwin

thank you for that.

Alastair Gardner

There's also a website called Pubchem. I'll try and find the link and post it, where it gives a much more detailed chemical search and links CAS numbers in it, it doesn't do HS codes but if you've got a chemical and you're not sure what the CAS number is, you can link it back onto that EU site that's been posted.

Mick Goodwin

Thank you. Yeah, that's useful.

Lydia Moi

Is that the UK, global tariff link or is it something else, I just posted a link.

HMRC UK Global Tariff - Search by CAS number: https://www.trade-tariff.service.gov.uk/chemical_search

Alastair Gardner

There's links into the EU site that we've been talking with a CAS number and then get an HS code from that, I haven't looked at that for a while I've just gone on it now. The appearance of it has certainly changed, but I imagine it still functions in the same way. But as I say I've, been using a thing called...

Janet Greenwood

Nope. We seem to have lost Alastair?

Mick Goodwin

disappeared.

Janet Greenwood

Certainly I know the Pubchem link. Yeah, I think most of the regulatory affairs people are familiar with Pubchem these days.

Julian Sarkar

Alistair appears to be muted on mine.

7 Grant funding for trade support

Janet Greenwood

Yeah. Lydia, can I just ask you about that grant funding link that you put in.

<https://www.customsintermediarygrant.co.uk/sme-brexite-support-fund>

Lydia Moi

Yeah, sure.

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Janet Greenwood

So is this to support people who are having difficulty trading this is for basically everybody in the room then.

Lydia Moi 51:33

Yeah, yeah, I mean obviously there are eligibility criteria.

If you click on the link, it will take you through the process and just check that the company is eligible.

And it can go towards I mean, we're probably past the point of companies wanting training I think. I'm guessing that most people want advice or consultation on a specific issue.

So you can potentially use that grant funding towards a private consultant, or tax specialists. Or I know lots of Chambers (of Commerce), and even the Institute of Export are doing bespoke packages that give you so much time of consultancy and it's linked in with an application for the grant, so it's all linked up together.

The grant's worth about £2000 in total, and different organisations are offering different types of packages: ready made packages, or you can go to your own private contacts and get consultancy from them as well and put a claim through the system but I'd just check your eligibility first.

Karen McAvoy

There's some things that have to be applied for by the end of this month. I'm sure there's a cut off date that I saw yesterday.

(Lydia) I'm not sure about grant

(Karen) but I thought it said the 29th of April.

Lydia Moi

It could be. One of them has already closed so there was another grant for training, and I can't see an expiry date but, I mean you might be right.

I think it has been used up fairly quickly, so it's a case of if you do, if you're interested, it seems to still be open at the moment but it's probably very likely that it will expire very soon.

So obviously do that as quickly as possible if it's something you might be interested in.

8 Pubchem as a source of CAS numbers

Mick Goodwin

Thank you. Alistair you're back, you've posted the Pubchem link.

<https://pubchem.ncbi.nlm.nih.gov/>

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Alastair Gardner

Yeah, I managed to paste the Pubchem pub link into my Zoom link which caught me off the wall. You would think that after over a year of doing this, we'd be used to it by now! (laughter)

Lydia Moi

The word "pub" must have got you in a tizzy!

Mick Goodwin

Thank you for that it's useful, it's very useful indeed. Karen you've asked a couple of questions in the chat.

9 Sending full and nominally empty tanks from GB back to Germany

Karen McAvoy

It's interesting talking about grants expiring, various things.

You never know when you need something, or when it's going to happen, the timing of, due to depending upon what's happening with your customer.

I can't go into too much detail other than to say, a set of circumstances has led that it's only just coming relevant for me suddenly to be moving tanks from here to Germany. So, one which is full, one which is part full.

Or, if I can persuade them to use what's in the part that (tank) would be nominally empty. If we can come up with another solution.

So the material is already been accounted for paid for, so it would be shipped back free of charge, but it's the vagaries of how do you deal with the quagmire of all the regulation, and what's gonna happen at the port, etc. Anybody got any idea?

Mick Goodwin

First question is, are these, these tanks or containers going to waste when they get here.

Karen McAvoy

No, they're going from here to Germany,

Mick Goodwin

are they going to

Karen McAvoy

go to, well one of them, the part (full) one, they would have to neutralize back neutralize when it got to site, and, and then dispose off to their (*waste disposal facility*)

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Mick Goodwin

I think you have to be very careful if you're shipping potentially hazardous, what could be called waste.

Karen McAvoy

It's very hazardous material.

The full one won't be, because it's remained sealed, unconnected to anything, so they will be able to reuse it.

The part one, they'll not take the risk, the full one they'll be able to (use it), it'll still be goods of value.

But we're not selling it to them. Just trying to move it from the UK back to Germany.

What's going to be involved really,

Janet Greenwood

I think Mick's right, the Transfrontier Shipment of Waste is going to come in for the part (*part full tank*).

You do have a choice though, because you could say to your supplier, because you bought this from Germany to sell on to somebody, "there's been a problem with their process" and therefore you've, ended up with what is otherwise usable material in a sealed container, and then you've got an unsealed container.

It may be more simple to say to your principals in Germany "just pay for the disposal of hazardous waste here in the UK on that part", if you can't sell it as usable goods over here.

Because the little bit I know about TFS is, it is a bleeding nightmare.

And that's before we get into customs and all the rest of it.

Karen McAvoy

Yeah, I mean the full one, the troubles gonna be the size of the containers its connections up to it and everything else, it could be difficult to resell here in the UK.

The containers have to go back anyway, they belong to Germany, because they're on a rental basis.

So this is not a simple situation regardless of any reference even if we dispose of the material, you'll still be sending shipping containers back nominally empty.

If you can get anybody to clean it.

My experience with this material, nobody wants to touch it, store it, or anything else.

So this is a hot potato that needs to be sorted.

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Janet Greenwood

I think maybe this is something we take to BEIS specifically.

So if you write all that out for me and we'll do it on email, we'll send it through to BEIS, and maybe DIT, we shall copy you in as well so both sides of the coin have got full sight of it. Yeah, I think that's the best way,

Karen McAvoy

It will go on dedicated transport won't be mixed with anything else so from that point of view that can simplify things down.

Janet Greenwood

Everything else is a nightmare, basically.

Karen McAvoy

Yeah, completely.

Mick Goodwin

Okay, thanks Karen Is that everything

Karen McAvoy

For me? Yeah.

10 Polymer Supply Chain Problems

Mick Goodwin

Yeah, cool I think that moves us on to the last main item: polymer supply chain problems FIS, Aaron?

Aaron Turrall

Thank you. Hi everyone. Yeah, we're having issues at the moment with raw material supply, and mainly polymer.

I think it's a number of different things at the moment. There's all sorts of reasons that are coming out of the woodwork from what I can tell.

I'm just wondering if anyone else is having the same kind of issues getting raw materials into the UK, just supply from Europe.

And I'm wondering if the DIT can do anything to help alleviate some of the issues UK manufacturers are having with raw materials.

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Lee Walker

Yeah, the problems are worldwide at the moment, and it's all down to the Force Majeures.

And as I can gather, we've got two orders that are on allocation and we've been told we're not going to get them till some time hopefully in May.

And we're talking 1000s and 1000s of kilos, I think from talking to the big suppliers in the UK this won't ease until July, August,

Aaron Turrall

Yeah that's that's what I'm getting, it's going to be at least two to three months.

Lee Walker

And between 30 and 50% price increases, if you can get raw materials.

Aaron Turrall

Yeah, yeah, we've seen that already.

Lee Walker

Yeah, and I would expect that to be the case now until at least July, looking at what people are telling me at the moment anyway. Same with mono propylene glycol, that's gone up, that's fourfold in price, it's now over four pounds a kilo.

Aaron Turrall

It's crazy.

Lee Walker

Yeah, all again down to the Force Majeures.

Aaron Turrall

It's just got a total knock on effect with everything. It's not just liquids, it's the solid material we're getting in as well. It's all across the board. I'm just wondering if anyone else is having the same issue, obviously it's everyone by the sounds of it.

Lee Walker

Yeah, I don't think any of the big companies that could possibly fill the gaps left by the Force Majeures were ready for this.

And obviously coinciding with this boom that we're now seeing on purchasing and customers coming on left, right and centre. I don't think anyone can cope with it, so those who have the orders on and are already in the supply chain have snapped up all the raw materials, and now it's just whoever can get what's left really.

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Alastair Gardner

I literally just yesterday got something sent through from the British Plastics Federation, and they've done a survey of the members and 97% of the responses said that they were having problems sourcing polymers, across the board.

I'm not sure what it's I'm not sure. think it was in Janet's email this morning said that it was possibly to do with the weather conditions in the States earlier in the year.

Lee Walker

Yeah, the Texas,

Alastair Gardner

the Texas one. Yeah,

Lee Walker

I think that was it.

Aaron Turrall

Yeah, there has been some closures of plants that I can remember.

Lee Walker

Yeah, and Lyondell was another one I think had a Force Majeure as well. Just difficult times, I think.

Aaron Turrall

It is, yeah, definitely.

Mick Goodwin

Anyone else had issues they want to share on that. Okay. Anyone else got any other questions that any issues, any things they want to share or bring up anything at all. Okay,

Janet Greenwood

We're good. Yeah.

Just if you've mentioned any links that need to go in that haven't gone in the chat, can you please send them through, or any information you promised me. Vicky had to go early for her second COVID jab but she says thanks very much to everybody. So, Yeah,

Date of next meeting

Janet Greenwood

In terms of maybe having another meeting.

Our next self help group meeting is going to be in June.

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Now we were looking at having a live one. But with all of the brouhaha with Sage playing bad cop and the Prime Minister playing good cop, there's no point even attempting that.

So we will have the next Self Help Group meeting, the original date was the 15th of June so we'll stick with that and we'll have it by Zoom.

We'll look at having a live meeting in September.

Obviously everybody's very welcome to the next meeting, and if you've got trade questions we can maybe deal with them in the main meeting, but this has been kind of an overspill meeting almost that we realized there were so many trade questions. So I think we just keep an eye on the situation.

And if we need to have another extra meeting like this, later on, then we can do. But ideally we'll be able to handle it within the main meeting going forward rather than calling people away from their desk for yet another bloody meeting. This is like a crisis response, isn't it.

Mick Goodwin

Okay, unless anyone else, anything else you want to contribute. I will say thank you very much. And we'll see you in June. Thank you everyone for, for attending, and we'll see you later. Thanks. Bye. Bye.

Meeting notes produced by

Janet Greenwood

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