

Dear Sir or Madam,

**REF: 2020 Border Strategy Consultation**

I am writing to you as Chief Executive of MCIA, the UK trade association for the supply side of powered two, three and light four-wheeled vehicles that make up the Powered Light Vehicle (PLV) sector. This is an circa £7billion industry, which registers around 100,000 vehicles per annum. The large majority of these are imported from various countries around the world.

MCIA welcomes the opportunity to respond to the consultation. We note that the ideas put forward are to an extent aspirational, though the PLV industry welcomes the overall strategic objectives and outcomes which have been put forward for comment.

At this stage, we have consulted internally on some of the questions raised and we are able to make the following general comments, which we feel represent how Government should be considering its overall approach to a range of matters in relation to the UK border.

As an industry which relies fundamentally on import and export, we are keen to work with Government as policy in this area moves forward. We look forward to further contact with officials as policy processes are developed and in taking an active part in this.

With regard to questions three and four, it is generally felt that the UK handles volume well, particularly on the key Dover to Calais route. However, borders are not well supported in terms of efficient IT and this gives rise to issues which could lead to notable disruption, if border operations have additional barriers after the EU exit transition ends in December. In order to have a world-leading border, lessons will need to be learned from RoW (Rest of World) operations in certain countries, as well as some of the systems used by individual EU Member States, with best practices adopted or adapted for UK use.

Government will need to work far more closely with traders if the ambitions set out in the consultation are to be realised. Particularly, as mentioned above, in the area of IT development, plus simpler and more straightforward access to 'simplifications' (questions 5 and 25). Simplifications and facilitations are not always easy to apply for and the lack of local customs officers has led to a culture where form filling to prescribed procedures, coupled with a lack of longer term experience among customs officers, has replaced trust and local relationships. This was not the case when the UK had a full local network of customs officers prior to the mid 1990s.



Ideally, the border for commercial goods will need to be largely virtual, with seamless IT declarations at each end, a simple checking process via ANPR and associated technology at the ports themselves.

Best practice in IT needs to be adopted where possible from the experiences of other countries. There are systems such as those used in France which can be adopted and new IT systems should be developed after much wider commercial tendering, instead of reliance on bespoke systems designed via the 'usual' suppliers. In other words, creativity, a new dynamic, joined up thinking and involvement from the sectors affected, needs to be a key feature of border design technology going forward.

In terms of key drivers of cost (Q7), this can be simply expressed in terms of flow volumes – the better the flow, the lower the overall cost. Conversely, the non financial barriers (Q8) relate to bureaucracy and process – which of course adds to cost when this is too burdensome.

Question 10 relates to adaptation. Traders are adaptable and have provisional plans in place to deal with certain situations such as those outlined, But the key issue here is that in the absence of clear policy and guidance post December 31st 2020, investment decisions are not easy to make to meet potential challenges. Clarity is needed urgently and with regard to the potential 2025 border, it is essential that Government include traders and their representative bodies in policy design and implementation plans.

The adaptation of supply chains is best assisted by a more holistic and hands on approach from Government, which is responsive at both macro and micro level to traders' needs. This again implies a need for more localised support from customs officers and more streamlined accessibility to simplifications and facilitations.

MCIA looks forward to working with officials on this matter as policy continues to develop.

Yours



Tony Campbell  
Chief Executive