



Bridge over A63 at Swanland

# Leaving the Customs Union and the affect on traveling on the Hull road network

a report produced by

**Hull and East Yorkshire  
for Europe**



An independent voluntary organisation affiliated to the European Movement



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## Executive Summary

- The A63/Castle Street is the main route East/West through the City of Hull to the Port of Hull
- This route is badly in need of an upgrade and the Government have put back improvements over a considerable period of time – 47,000 vehicles per day
- Heavy traffic + accidents/breakdowns can rapidly can quickly create gridlock on both the A63 and surrounding roads
- The average number of trucks using the A63 per day is 184
- Leaving the Customs Union will create far greater “friction” and, therefore, far greater holdups inside the dock area
- Once the dock area is full of waiting lorry + containers and separate containers there is no where else to park them other than onto the road system around the dock
- Once full if the lorries waiting for Customs clearance are parked on the A63 (as per the M20 when Dover cannot move lorries) the potential queue will grow by 3.3kms per day
- It will take 4 days to reach David Davis's Parliamentary Constituency
- If this was to happen the traffic flow through and in the city would rapidly grind to a halt

## **Leaving the Customs Union and the affect on the Hull road network**

### **Report produced by Hull & East Yorkshire for Europe**

This Briefing Report addresses the potential consequences to Hull and the surrounding area of the UK leaving or having diminished access to the European Union Customs Union with particular emphasis on traffic and communications. The UK Government has stated that the vote to leave the EU should be “interpreted” as leaving both the Single Market and the Customs Union.

#### **The Current traffic situation on the main route through to the docks**

Hull Docks handle **66,264 lorries**, on average, every year <sup>i</sup>..

The vast majority approach the Docks via the **A63/Castle Street** running through the south side of Hull city centre.

“This busy road has approximately **47,000 vehicles traveling along it each day**. Delays at peak times cause problems for people and businesses.” <sup>ii</sup>

The road is a standard dual carriageway. If there is a breakdown of a car or lorry it is quite normal for the queue of traffic to quickly reach miles and seriously affect the surrounding road network.

#### **Live as A63 lane closed and heavy traffic heading out of Hull after crash**

Hull Daily Mail – 26 June 2017

#### **Updates as traffic chaos brings Hull to a standstill**

Hull Daily Mail – 1 September 2017

#### **How traffic moves quickly through Hull Docks onto ferries**

Lorry traffic through the city centre on the A63 are able, assuming no hold ups such as accidents, breakdowns or Castle St Bridge over the River Hull being raised, to travel straight through to the Docks.

- They then either drop their trailer in the parking area for it to be put onto either an ordinary ferry or a Lo-Lo Ferry (Lift on-Lift off) later or
- the lorry and trailer are driven straight onto the Ro-Ro (Roll on-Roll off) ferry to be driven straight off on arrival.

Currently, for EU registered vehicles (which include all UK vehicles) there is minimal paperwork for boarding and onward travel. There are very few “third country” (eg Ukrainian, or Turkish) vehicle transport through the port.

In a House Commons Report <sup>iii</sup> heard evidence “that goods vehicles entering the UK from the EU “undergo virtually no customs interventions at all” and generally simply drive straight through the border. While the UK is part of the Customs Union outward traffic is treated in the same way.

Associated British Ports (ABP) have recently invested £50m in Immingham and Hull Docks but these have been primarily in increasing Container traffic rather than facilities or space for Ro-Ro traffic.

## Changes to dockside Customs arrangements if the UK leaves the EU Customs Union

Planning for the potential changes to Customs checking (both inward and outward) have been discussed at Government level but, it appears that, they have not been acted upon.

“We would need to buy actual space in ports for immigration officers, customs facilities and sanitary checks to make sure imported food meets whatever standards we set. Dover should be humming - soon, at least - with bulldozers and cement mixers as we prepare for a new world with an independent customs policy.

There have been estimates of a need for 3,000 to 5,000 extra customs officers to cope with the extra traffic inherit in Brexit. Defra will also need to increase staffing and capacity at ports, to allow for the testing of agricultural products and livestock entering the country. We will need new border agents. All these people need recruiting and training.

The new customs computer system - CDS - is going to need to work. We will also need to replace the EU's Trade Control and Expert System (known as TRACES), the tool for tracking livestock and animal products - a new IT system. And you need both of these things to be in place in time before Brexit, so we can demonstrate it works.” Chris Cook (Policy Editor - Newsnight <sup>iv</sup>

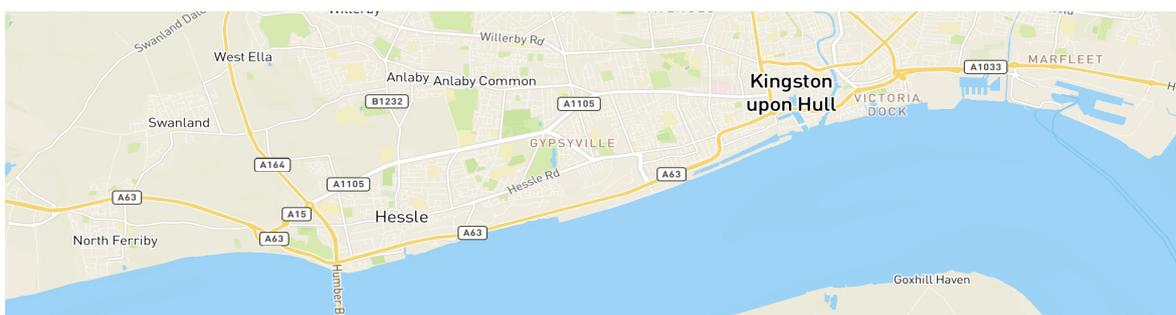
## The potential results if the UK were to leave the Customs Union

If, having left the Customs Union, lorries were being parked up within the area of the North Sea Ferries RO-RO docks while the awaited customs clearance this area would rapidly fill up. There is currently no substantial area outside the docks to be used as a holding area waiting for entry to the docks. (see satellite image on page 7)

The usual maximum length of an articulated lorry & trailer is 16.5m <sup>v</sup>

Allowing 1.5m for parking distances between lorries (making a total of 18m per lorry) if there was a need for the lorries to park outside the docks it would create a line of lorries 3.3km long per day once the dock area had no further space.

**Once this happened the first day of using one lane of the A63 as lorry parking would create a line of lorries stretching as far as the River Hull. On the second day the line would stretch as as St Andrew's Quay Shopping area and so on until Day 4 they would reach David Davis's Constituency just the west of the Humber Bridge on the outskirts of the City of Hull.**





Bridge over the A63 at Swanland – just 10 miles from Hull Docks and in the Parliamentary Constituency of David Davis (Sec of State for Exiting the EU)



A traffic jam on the way to Dover CREDIT: GFTTY

## **Additional Information and Resources**

### **Investment in Hull Docks mainly aimed at Container transport not Ro-Ro traffic**

Hull has a dedicated container terminal stretching over 30 acres. The terminal has benefited from over £15m of recent investment by ABP, which included two new Liebherr ship to shore cranes. It handles more than 9,000 containers per month. They can contain anything from IKEA furniture, food, electronics and even people's belongings.

(source HDM)

### **The Customs Union removes tariffs between member states**

The Customs Union prohibits member states from charging tariffs on, or restricting the quantity (through quotas) of, goods traded within the EU. It does this by establishing a 'common external tariff' – a common set of duties charged to goods coming from third countries (countries outside of the EU) while abolishing those same duties inside the union. This means that all intra-EU trade is tariff-free.

### **The Single Market removes many regulatory barriers between member states**

It is a 'regulatory union'. It removes regulatory barriers in three main ways, through harmonisation, mutual recognition and market surveillance.

### **Outside the Customs Union UK exporters would face a step change in the documentation required**

Currently, anyone who exports from the UK to the EU needs simply to register with HM Revenue & Customs and then attach a commodity code to their export. With no customs deal, all exporters would need to complete both a Single Administrative Document (SAD) and an Entry Summary Declaration (ENS), with additional specialist documentation required for highly regulated goods, transport permits and insurance certificates. The SAD alone consists of 54 boxes with eight parts, which must be completed and submitted for every declaration. These would all be additional burdens on exporters

### **The UK would lose access to import customs IT systems designed for cooperation between member states**

No deal would mean no access to current EU-wide e-customs systems that reduce the need for lengthy paper-based procedures for declaring goods. Of those e-customs systems, one of the most important is the New Computerised Transit System (NCTS). The UK would not be party to the agreement, which allows all EU member states and the signatories of the Common Transit Convention – member states of the European Free Trade Association (Iceland, Lichtenstein, Norway and Switzerland), Macedonia, Serbia and Turkey – to submit transit declarations and proof of guarantee (bond money) electronically, with the capability of tracking the consignment across member states.

The agreement allows a faster flow of goods, paperless customs clearance and shorter queues of trucks at border crossings and reduces the cost of customs procedures. One study on the NCTS in the EU showed that it had obtained a productivity gain of about 30 minutes per shipment.

At the moment, UK goods are assumed to meet EU regulatory standards, and checks by UK authorities are recognised by other EU authorities. With no deal this would no longer be the case. Exporters from the UK would have to be able to prove that goods meet EU standards – and this could involve border inspections.

### **Some goods would face additional regulatory controls**

The new regime would be particularly onerous for goods that are 'controlled', such as animal products, nuclear material and chemicals. At the moment, government authorities such as the Department for Environment, Food & Rural Affairs (Defra) or the Department for Business, Energy & Industrial Strategy (BEIS) certify manufacturers and exporters with licenses to trade in those goods domestically. These licenses and certificates are valid across the EU and an assumption of conformity means that they do not face checks at the border. However, once the UK leaves the EU they would no longer be valid because the rules for third-country goods laid down in the Union Customs Code mean that, without agreement, only EU licenses and certificates certifying conformity with EU regulations are valid.

### **The experience of Dover – much larger but with many of the road traffic problems that Hull has**

A lorry driver arriving at Dover or the Channel Tunnel en route to France will stop only briefly to show passports and boarding information, and on arrival can be on the French motorway in minutes. These crossings are designed for intra-community trade: they rely on fast-moving flows and as little 'dwell time' as possible. Less than 1% of lorries arriving in the UK through Dover or the Channel Tunnel require customs checks, but with no facilities at either terminal, that clearance is done six miles away – at a truck stop on the M20 with just 82 parking spaces.

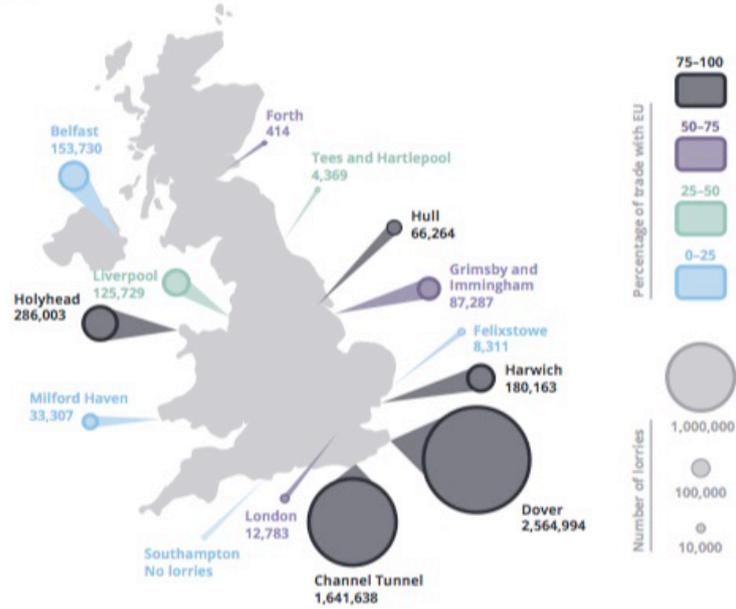
(Source: Institute for Government – various reports)

### **Trade being hampered on the Norwegian-Swedish Border**

In a report earlier this year based on a survey of 2,000 Swedish companies, the Swedish National Board of Trade said respondents identified **customs as the main problem hampering trade with Norway**. (source: National Board of Trade, Sweden)

Pat Maguire  
Chair – Hull and East Yorkshire for Europe  
February 2018

**Figure 2: Annual lorry traffic and EU share of trade for selected major UK ports in 2015**



Source: Department for Transport: Maritime and Shipping Statistics



- i [https://www.instituteforgovernment.org.uk/sites/default/files/publications/IfG\\_Brexit\\_customs\\_WEB\\_0.pdf](https://www.instituteforgovernment.org.uk/sites/default/files/publications/IfG_Brexit_customs_WEB_0.pdf)
- ii <http://roads.highways.gov.uk/projects/a63-castle-street-improvement/>
- iii <https://publications.parliament.uk/pa/cm201719/cmselect/cmhaff/540/540.pdf>
- iv <http://www.bbc.co.uk/news/uk-41271028>
- v Lorry Sizes [researchbriefings.files.parliament.uk/documents/SN00654/SN00654.pdf](https://researchbriefings.files.parliament.uk/documents/SN00654/SN00654.pdf)

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