

# Brexit

## 68 EU Notes to Stakeholders

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Category	If no agreement is reached:	Consequence	EU Document
Agriculture Animal Breeding	<b>As of the withdrawal date</b> , the EU rules in the field of Regulation (EU) 2016/1012 on zootechnical and genealogical conditions for the breeding, trade in and entry into the Union of purebred breeding animals of the bovine, ovine, caprine, porcine and equine species, hybrid breeding pigs and the germinal products thereof no longer apply to the United Kingdom.	Trade of Connemara Ponies bred in the UK will be impacted.	WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF BREEDING OF ANIMALS
Agriculture Animal Breeding	<b>As of the withdrawal date</b> , breed societies and breeding operations in the United Kingdom will no longer be listed in accordance with Article 7 of Regulation (EU) 2016/1012.	Trade on Connemara Ponies bred in the UK will be impacted.	WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF BREEDING OF ANIMALS
Agriculture Animal Breeding	As of the withdrawal date, purebred breeding animals and hybrid breeding pigs, or the offspring of germinal products of those animals, may only be entered in breeding books or registered in breeding registers established in Member States of EU 27, if they were accompanied by a zootechnical certificate in accordance with Commission Implementing Regulation (EU) 2017/717, issued by a breeding body in the United Kingdom if listed in accordance with Article 34 of Regulation (EU) 2016/1012.	Trade on Connemara Ponies bred in the UK will be impacted.	WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF BREEDING OF ANIMALS
Agriculture Animal Breeding	Breeders who have their breeding animals entered in breeding books established by breed societies or registered in breeding registers established by breeding operations recognised in the United Kingdom may consider to enter or register those animals before the withdrawal date (also) in the appropriate breeding books and registers established for the same breed or cross in a Member State of EU 27.	Trade on Connemara Ponies bred in the UK will be impacted.	WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF BREEDING OF ANIMALS
Agriculture Animal Breeding	As of the withdrawal date Equidae imported into a Member State of EU 27 from the United Kingdom after the withdrawal date shall be identified, as any equidae imported from other third countries, in accordance with Articles 14 and 15 of Regulation (EU) 2015/262.	<i>Equidae is the taxonomic family of horses and related animals, including the extant horses, donkeys, and zebras etc. see: FAQ <a href="https://www.agriculture.gov.ie/.../FAQsAboutHorsePassportsMicrochips150716.doc">https://www.agriculture.gov.ie/.../FAQsAboutHorsePassportsMicrochips150716.doc</a></i>	WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF BREEDING OF ANIMALS

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Agriculture Animal Feed	As of the withdrawal date, the EU rules in the field of animal nutrition no longer apply to the United Kingdom.	<b>After the withdrawal date UK animals fed with Non EU compliant feedstuffs (those containing EU unapproved hormones, antibiotics, additives etc.) would not be allowed to enter the EU market.</b>	WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES ON ANIMAL FEED
Agriculture Animal Feed	Applicants (natural or legal persons) for authorisation of feed additives: must be established within the EU or the European Economic Area (EEA) or designate a representative established within the EU and communicate its relevant contact details to the European Commission		WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES ON ANIMAL FEED
Agriculture Animal Feed	UK Holders of authorisations of feed additives / Applicants of feed additives: for which the authorisation has not yet been granted to an authorisation holder by an implementing Regulation, because it is in process of evaluation or authorisation, have to designate a representative established within the EU or the EEA. The relevant contact details of the representative have to be communicated to the European Commission;		WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES ON ANIMAL FEED
Agriculture Animal Feed	UK FBOs intending to export to the EU must designate a representative within the EU or the EEA for the establishments involved in that activity.		WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES ON ANIMAL FEED
Agriculture Animal transport	<b>As of the withdrawal date</b> , the EU public and animal health rules of intra-Union trade in live animals, the placing on the market of aquaculture animals, the controls carried out on such movements and EU law on animal transport no longer apply to the United Kingdom. It is also relevant for the movement of live animals and hatching eggs from and to the Channel Islands and the Isle of Man.		WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES ON ANIMAL HEALTH AND WELFARE AND PUBLIC HEALTH RELATED TO THE MOVEMENT OF LIVE ANIMALS

Category	If no agreement is reached:	Consequence	EU Document
Agriculture Animal transport	<b>ENTRY OF LIVE ANIMALS INTO THE EU:</b> As of the withdrawal date, the entry of live animals <sup>16 17</sup> from the United Kingdom into the EU 27 is prohibited for public and animal health reasons, unless: 1) The United Kingdom is "listed" as a third country by the Commission for animal health <sup>18</sup> purposes. 2) The specific animal health requirements and veterinary certification conditions set out with the "listing" for the species or categories of animals from the United Kingdom are fulfilled, 3) The United Kingdom is "listed" by the Commission as a third country having a residue control plan approved in accordance with Directive 96/23/EC <sup>19</sup> for the animals and animal products specified therein.		WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES ON ANIMAL HEALTH AND WELFARE AND PUBLIC HEALTH RELATED TO THE MOVEMENT OF LIVE ANIMALS
Agriculture Animal transport	<b>As of the withdrawal date</b> The "Tripartite Agreement" concluded in accordance with Article 6 of Directive 2009/156/EC between France, Ireland and the United Kingdom no longer applies to the United Kingdom		WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES ON ANIMAL HEALTH AND WELFARE AND PUBLIC HEALTH RELATED TO THE MOVEMENT OF LIVE ANIMALS
Agriculture Animal transport	As of the withdrawal date, these substantial requirements are controlled upon entry into the EU 27 by applying mandatory border checks, including veterinary checks, at the first point of entry into the Union territory: 1) Live animals can only enter the EU 27 through "border inspection posts" <sup>20</sup> approved for the species and categories of animals concerned; 2) Each consignment has to be accompanied by a duly completed health certificate in compliance with EU animal health import legislation; 3) Each consignment undergoes documentary, identity and physical checks; 4) Live animals are only allowed to enter the EU 27 with the official document (Common Veterinary Entry Document) attesting that the border checks were satisfactorily carried out in compliance with the applicable animal and, public health rules.		WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES ON ANIMAL HEALTH AND WELFARE AND PUBLIC HEALTH RELATED TO THE MOVEMENT OF LIVE ANIMALS

Category	If no agreement is reached:	Consequence	EU Document
<b>Agriculture Animal transport</b>	As of the withdrawal date these conditions also apply to the entry into the EU 27 of live animals from the United Kingdom for the purpose of transit from the United Kingdom to another third country or to another part of the United Kingdom. The consignment has to pass through border inspection posts both at entry into and exit from the Union, including the respective notifications in the EU Trade Control and Expert System (TRACES).		WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES ON ANIMAL HEALTH AND WELFARE AND PUBLIC HEALTH RELATED TO THE MOVEMENT OF LIVE ANIMALS
<b>Agriculture Animal transport</b>	As of the withdrawal date in case of transit from the EU 27 through the United Kingdom to the EU 27, live animals have to be accompanied by an intra-Union trade certificate and pass through a border inspection post at entry into the EU 27, including the respective notifications in TRACES		WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES ON ANIMAL HEALTH AND WELFARE AND PUBLIC HEALTH RELATED TO THE MOVEMENT OF LIVE ANIMALS
<b>Agriculture Animal transport</b>	Animal welfare: As of the withdrawal date Live animals admitted to enter the EU 27 from the UK will have to be transported according to all the animal welfare rules laid down in Council Regulation (EC) No 1/200528, and will be submitted to checks at border inspection posts by the competent authorities as laid down in Article 21 of that Regulation.		WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES ON ANIMAL HEALTH AND WELFARE AND PUBLIC HEALTH RELATED TO THE MOVEMENT OF LIVE ANIMALS

Category	If no agreement is reached:	Consequence	EU Document
Agriculture Animal transport	EXIT OF LIVE ANIMALS FROM THE EU: As of the withdrawal date, the exit of live animals <sup>30</sup> from a Member State to the United Kingdom through the territory of another Member State is subject to the following conditions: 1) The transport operation must ensure that in accordance with Decision 93/444/EEC <sup>31</sup> the consignment remains under customs supervision up to the point of exit from Union territory; 2) Each consignment of animals is accompanied by veterinary documents or veterinary certificates meeting relevant veterinary requirements of the United Kingdom and health certificates for intra-Union trade, which contain, where necessary and applicable, the additional guarantees provided for by Union legislation for animals intended for slaughter; 3) A message must be addressed in TRACES to the place of destination, which is the border inspection post of exit or the local authority of the place in which the point of exit is situated, and to the central authorities of the place of destination and of the Member State(s) of transit.		WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES ON ANIMAL HEALTH AND WELFARE AND PUBLIC HEALTH RELATED TO THE MOVEMENT OF LIVE ANIMALS
Agriculture Animal transport	Animal welfare: As of the withdrawal date The transport of live animals exiting the EU to the United Kingdom will have to comply with Council Regulation (EC) No 1/2005 up to the final place of destination and will be submitted to checks at the exit point by the competent authorities as laid down in Article 21 of that Regulation.		WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES ON ANIMAL HEALTH AND WELFARE AND PUBLIC HEALTH RELATED TO THE MOVEMENT OF LIVE ANIMALS
Agriculture Animal Transport authorisations	<b>As of the withdrawal date</b> , Council Regulation (EC) No 1/2005 on the protection of animals during transport no longer applies to the United Kingdom,		WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES FOR AUTHORISATIONS AND CERTIFICATES FOR TRANSPORTERS OF LIVE ANIMALS, DRIVERS AND ATTENDANTS

Category	If no agreement is reached:	Consequence	EU Document
Agriculture Animal Transport authorisations	<b>Transporter authorisations: As of the withdrawal date</b> Transporter authorisations granted by the competent authorities of the United Kingdom pursuant to Articles 10 or 11 of the Regulation will no longer be valid in the European Union from the moment the United Kingdom becomes a third country.		WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES FOR AUTHORISATIONS AND CERTIFICATES FOR TRANSPORTERS OF LIVE ANIMALS, DRIVERS AND ATTENDANTS
Agriculture Animal Transport authorisations	As of the withdrawal date Transporters who hold such an authorisation and want to continue their professional activities in the European Union will have to apply for a new authorisation with an EU 27 Member State.		WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES FOR AUTHORISATIONS AND CERTIFICATES FOR TRANSPORTERS OF LIVE ANIMALS, DRIVERS AND ATTENDANTS
Agriculture Animal Transport authorisations	<b>Certificates of approval of means of transport: As of the withdrawal date</b> Certificates of approval <sup>6</sup> granted by the competent authorities of the United Kingdom pursuant to Articles 18 or 19 of the Regulation will no longer be valid in the European Union from the moment the United Kingdom becomes a third country.		WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES FOR AUTHORISATIONS AND CERTIFICATES FOR TRANSPORTERS OF LIVE ANIMALS, DRIVERS AND ATTENDANTS
Agriculture Animal Transport authorisations	As of the withdrawal date Transporters who want to continue their professional activities in the European Union will have to apply for the relevant certificate of approval with an EU 27 Member State.		WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES FOR AUTHORISATIONS AND CERTIFICATES FOR TRANSPORTERS OF LIVE ANIMALS, DRIVERS AND ATTENDANTS



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Agriculture Animal Transport authorisations	<b>Certificates of competence for drivers and attendants: As of the withdrawal date</b> Certificates of competence <sup>7</sup> granted by the competent authorities of the United Kingdom pursuant to Article 17(2) of the Regulation will no longer be valid from the moment the United Kingdom becomes a third country.		WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES FOR AUTHORISATIONS AND CERTIFICATES FOR TRANSPORTERS OF LIVE ANIMALS, DRIVERS AND ATTENDANTS
Agriculture Animal Transport authorisations	As of the withdrawal date Persons who hold such a certificate of competence and want to continue their professional activities in the European Union will have to apply for a new certificate with an EU 27 Member State.		WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES FOR AUTHORISATIONS AND CERTIFICATES FOR TRANSPORTERS OF LIVE ANIMALS, DRIVERS AND ATTENDANTS
Agriculture Biocides	<b>As of the withdrawal date</b> , the EU rules in the field of biocidal products no longer apply to the United Kingdom.		WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES ON BIOCIDAL PRODUCTS
Agriculture Biocides	<b>As of the withdrawal date</b> business operators should consider that, according to Union law, third countries cannot act as evaluating Member States or reference Member States.		WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES ON BIOCIDAL PRODUCTS
Agriculture Biocides	<b>Before the withdrawal date Concerning</b> submissions of any new applications, business operators should take into account the expected timelines of the different regulatory procedures in which the United Kingdom would be acting as, for example, evaluating Member State or reference Member State. Where there is a risk that those procedures are not concluded by the date that the United Kingdom leaves the Union, applicants may choose by preference another evaluating Member State or reference Member State to carry out the evaluation.		WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES ON BIOCIDAL PRODUCTS

Category	If no agreement is reached:	Consequence	EU Document
Agriculture Biocides	<b>Before the withdrawal date</b> Concerning those on-going procedures for which the United Kingdom is currently carrying out an evaluation, business operators should carefully monitor their progress. Where there are clear indications that the procedure will not be concluded by the withdrawal date, taking account of the uncertainties as well as the regulatory framework, business operators should consider taking the relevant actions.		WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES ON BIOCIDAL PRODUCTS
Agriculture Biocides	<b>Before the withdrawal date</b> <b>Business</b> operators should also consider that, according to Union law: 1) holders of product authorisations must be established within the Union (or EEA countries or Switzerland); 2) active substance or product suppliers included in the list referred to in Article 95 of the Biocidal Products Regulation (EU) No 528/2012 must be established or have a representative established within the Union (or EEA countries or Switzerland).		WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES ON BIOCIDAL PRODUCTS
Agriculture Fisheries	Third country vessels may only engage in fishing activities in Union waters if in possession of an authorisation issued by the European Commission. As of the withdrawal date, these rules will apply to United Kingdom fishing vessels wishing to engage in fishing activities in Union waters.	UK Fishing activities may be restricted. <b>New licences may be required by Irish boats. The UK may impose similar restrictions and relicensing requirements on Irish vessels.</b>	WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES ON FISHERIES AND AQUACULTURE
Agriculture Fisheries	Access to ports of UK, including port services and first-stage marketing installations, and the landing of catches in such ports by vessels flying the flag of an EU Member State are subject to the rules in the UK.	<b>Irish boats landing catch in the UK will be subject to UK not EU law</b>	WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES ON FISHERIES AND AQUACULTURE
Agriculture Fisheries	Access to ports of EU Member States, including port services and the use of first-stage marketing installations, as well as the conduct of landing and transhipment operations in such ports shall be prohibited for vessels flying the flag of a third country unless they meet EU requirements.	UK boats will have to continue to comply with EU laws	WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES ON FISHERIES AND AQUACULTURE

Category	If no agreement is reached:	Consequence	EU Document
Agriculture Fisheries	UK fish exports will now have to be certified. in accordance with applicable laws, regulations and international conservation and management measures. The catch certificate must have been validated by the United Kingdom competent authority and, when required, accompanied by other documents envisaged by the certification scheme in the event of an indirect import after transshipment, transit or processing of the products in another third country		WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES ON FISHERIES AND AQUACULTURE
Agriculture Fisheries	Export of catches made by Union fishing vessels to the United Kingdom will also be subject to the catch certification scheme if the United Kingdom certifies to the European Commission by way of notification that it has in place relevant implementation, control and enforcement arrangements and public authorities empowered to verify certificates	<b>Irish boats landing catch in the UK will be subject to UK certification rules.</b>	WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES ON FISHERIES AND AQUACULTURE
Agriculture Fisheries	Fishery and aquaculture products placed on the EU market are subject to specific market requirements which include the specific consumer information requirements and marketing standards on fishery and aquaculture products	UK Fishery and aquaculture products must continue to comply with EU regulations in order to be acceptable for import to the EU market. <b>UK regulations may diverge from these over time and Irish Fishery and aquaculture products will have to comply with these to export and sell product in the UK.</b>	WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES ON FISHERIES AND AQUACULTURE
Agriculture Fisheries	For organic aquaculture, for products placed on the EU 27 market as of the withdrawal date, new certificates issued by control authorities and bodies in the United Kingdom are no longer valid.	UK exports will be required to certify products in each of the EU 27 countries. <b>Irish Organic aquaculture products may need recertification after Brexit.</b>	WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES ON FISHERIES AND AQUACULTURE
Agriculture Fisheries	As of the withdrawal date, producer organisations and inter-branch organisations recognised in the United Kingdom will no longer be considered professional organisations under EU law.	<b>Irish fisheries producer organisations and inter-branch organisations may no longer be recognised as professional organisations in the UK</b>	WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES ON FISHERIES AND AQUACULTURE

Category	If no agreement is reached:	Consequence	EU Document
Agriculture Genetically Modified Organisms (GMO)	As of the withdrawal date, the EU rules in the field of genetically modified food and feed and the deliberate release of genetically modified organisms into the environment no longer apply in the United Kingdom.		EU RULES ON GENETICALLY MODIFIED FOOD AND FEED AND THE DELIBERATE RELEASE OF GENETICALLY MODIFIED ORGANISMS INTO THE ENVIRONMENT
Agriculture Genetically Modified Organisms (GMO)	Under Regulation (EC) No 1829/2003, authorisation holders or their representatives must be established in the European Union (or in one of the contracting states of the European Economic Area);		EU RULES ON GENETICALLY MODIFIED FOOD AND FEED AND THE DELIBERATE RELEASE OF GENETICALLY MODIFIED ORGANISMS INTO THE ENVIRONMENT
Agriculture Genetically Modified Organisms (GMO)	applications for the placing on the market of genetically-modified organisms under Directive 2001/18/EC must designate a person responsible for the placing on the market which must be established in the European Union (or in one of the contracting states of the European Economic Area).		EU RULES ON GENETICALLY MODIFIED FOOD AND FEED AND THE DELIBERATE RELEASE OF GENETICALLY MODIFIED ORGANISMS INTO THE ENVIRONMENT
Agriculture Genetically Modified Organisms (GMO)	Business operators should consider that applications and notifications pursuant to Regulation (EC) No 1829/2003 and Directive 2001/18/EC can only be submitted to the competent authorities of EU Member States (or of contracting states of the European Economic Area). In particular, business operators should carefully take into account the expected timelines before the submission of any new application in which the United Kingdom would be acting as rapporteur Member State under Directive 2001/18/EC.		EU RULES ON GENETICALLY MODIFIED FOOD AND FEED AND THE DELIBERATE RELEASE OF GENETICALLY MODIFIED ORGANISMS INTO THE ENVIRONMENT
Agriculture Pesticides	<b>As of the withdrawal date</b> , the EU rules in the field of plant protection products and pesticides no longer apply to the United Kingdom.	<i>Where there is a risk that approval procedures are not concluded by the date when the United Kingdom will leave the Union, applicants may choose by preference another Member State to carry out the evaluation or assessment.</i>	WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES ON PLANT PROTECTION PRODUCTS

Category	If no agreement is reached:	Consequence	EU Document
<b>Agriculture Pesticides</b>	As of the withdrawal date the UK cannot act as a rapporteur Member States, zonal rapporteur Member States or evaluating Member States for MRLs (maximum residue levels of pesticides).		WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES ON PLANT PROTECTION PRODUCTS
<b>Agriculture Pesticides</b>	Where there are clear indications that the procedure will not be concluded by the withdrawal date, taking account of the uncertainties as well as the regulatory framework, business operators should consider taking the necessary actions. For example, a change of rapporteur or evaluating Member State may be required.		WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES ON PLANT PROTECTION PRODUCTS
<b>Agriculture Plant Health</b>	As of the withdrawal date, the EU plant health legislation in the field of intra-Union trade in plants, plant products and other objects no longer apply to the United Kingdom. This is also relevant for plants, plant products or other objects coming from the Channel Islands and the Isle of Man.		WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES ON PLANT HEALTH
<b>Agriculture Plant Health</b>	INTRODUCTION OF PLANTS, PLANT PRODUCTS OR OTHER OBJECTS INTO THE EU: the introduction into the Union of certain plants, plant products and other objects listed in Parts A and B of Annex III to Directive 2000/29/EC into the Union is prohibited.		WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES ON PLANT HEALTH
<b>Agriculture Plant Health</b>	Certain plants, plant products and other objects listed in Part A of Annex IV to Directive 2000/29/EC may only be introduced into the Union if they comply with the special requirements set out in that Part.		WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES ON PLANT HEALTH
<b>Agriculture Plant Health</b>	As of the withdrawal date, the introduction of plants, plant products and other objects from the United Kingdom into the EU 27 will be governed by this Directive 2000/29/EC. This is in particular relevant for the introduction into the EU of wood packaging material: such wood packaging, whether or not actually in use for the transport of objects of all kinds, has to be compliant with a treatment and mark as specified in the FAO International Standard for Phytosanitary Measures No 15 ('ISPM 15').		WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES ON PLANT HEALTH

Category	If no agreement is reached:	Consequence	EU Document
Agriculture Plant Health	<b>OFFICIAL CONTROLS FOR IMPORTS OF PLANTS, PLANT PRODUCTS OR OTHER OBJECTS:</b> As of the <b>withdrawal date</b> the plants, plant products or other objects listed in Part B of Annex V to that Directive, introduced into the EU from the UK shall be accompanied by a phytosanitary certificate. According to Article 13a, each of those commodities shall be subject to a meticulous documentary, identity and physical check.		WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES ON PLANT HEALTH
Agriculture Plant Health	After 14 December 2019, those products shall be subject to the import controls of Articles 44 to 64 of Regulation (EU) 2017/625 on official controls, which will replace the respective rules of Directive 2000/29/EC.		WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES ON PLANT HEALTH
Agriculture Plant reproductive material	<b>As of the withdrawal date</b> , the EU rules in the field of marketing of plant reproductive material no longer apply to the United Kingdom.		EU RULES IN THE FIELD OF MARKETING OF SEEDS AND OTHER PLANT REPRODUCTIVE PROPAGATING MATERIAL
Agriculture Plant reproductive material	<b>Inclusion in Common Catalogues or national registry (catalogue, register or list):</b> Varieties of agricultural and vegetable species have to be maintained in an EU27-Member State in order for their seed to be allowed to be marketed within the Union.		EU RULES IN THE FIELD OF MARKETING OF SEEDS AND OTHER PLANT REPRODUCTIVE PROPAGATING MATERIAL
Agriculture Plant reproductive material	According to EU legislation, varieties of fodder plant seed, cereal seed, beet seed, vegetable seed, vegetable propagating material, seed potatoes and seed of oil and fibre plants (agricultural and vegetable species) must be examined and accepted by at least one Member State and listed in the Common Catalogues of Directive 2002/53/EC or Directive 2002/55/EC to be allowed to be marketed throughout the Union.		EU RULES IN THE FIELD OF MARKETING OF SEEDS AND OTHER PLANT REPRODUCTIVE PROPAGATING MATERIAL
Agriculture Plant reproductive material	As of the withdrawal date varieties that have been included in the Common Catalogues by the United Kingdom only must be accepted by an EU 27 Member State in order for the varieties to remain in those Common Catalogues in order to continue to be allowed to be marketed in the EU after the withdrawal date.		EU RULES IN THE FIELD OF MARKETING OF SEEDS AND OTHER PLANT REPRODUCTIVE PROPAGATING MATERIAL

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Agriculture Plant reproductive material	Interested UK parties should submit the respective applications to the responsible official body of an EU 27 Member State in a timely manner before that date, in order to ensure that those varieties are also inserted in a timely manner in the respective Common Catalogues.		EU RULES IN THE FIELD OF MARKETING OF SEEDS AND OTHER PLANT REPRODUCTIVE PROPAGATING MATERIAL
Agriculture Plant reproductive material	Varieties or basic material of forest plants included in the registry of United Kingdom only must be accepted by another Member State or supplier in another Member States in order for those varieties or material to continue to be allowed to be marketed in the EU after the withdrawal date.		EU RULES IN THE FIELD OF MARKETING OF SEEDS AND OTHER PLANT REPRODUCTIVE PROPAGATING MATERIAL
Agriculture Plant reproductive material	Vine propagating material, Fruit propagating material, varieties or forest basic material may only be marketed throughout the Union once they are included in the national registry in one Member State or - in the case of ornamental propagating material – at least in a suppliers list of an EU 27 Member State.		EU RULES IN THE FIELD OF MARKETING OF SEEDS AND OTHER PLANT REPRODUCTIVE PROPAGATING MATERIAL
Agriculture Plant reproductive material	Breeders should be aware that after the withdrawal date, the examination results have to stem from examinations in an EU 27 Member State for the variety to be included in the Common Catalogues or national registry. UK testing results received after the withdrawal date will not meet this criterion and be invalid.		EU RULES IN THE FIELD OF MARKETING OF SEEDS AND OTHER PLANT REPRODUCTIVE PROPAGATING MATERIAL
Agriculture Plant reproductive material	Marketing of seed and propagating material: As of the withdrawal date imports of seed and propagating material from the UK are subject to the respective provisions of each Directive concerning recognition of equivalent requirements of third countries.		EU RULES IN THE FIELD OF MARKETING OF SEEDS AND OTHER PLANT REPRODUCTIVE PROPAGATING MATERIAL
Agriculture Plant variety rights	As of the withdrawal date, the EU rules in the field of Plant Variety Rights no longer apply to the United Kingdom		WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF UNION PLANT VARIETY RIGHTS
Agriculture Plant variety rights	<b>As of the withdrawal date</b> the Examination Offices in the United Kingdom will no longer have the possibility to participate in the technical verification of the maintenance of the protected varieties.		WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF UNION PLANT VARIETY RIGHTS



Category	If no agreement is reached:	Consequence	EU Document
Agriculture Plant variety rights	According to Article 82 of the Basic Regulation, persons who are not domiciled or do not have a seat or an establishment within the EU territory may participate as party to proceedings before the Office only if they have designated a procedural representative who is domiciled or has his seat or an establishment within the EU territory. All interested breeders who are currently domiciled or have a seat in the United Kingdom only should consider the need to designate in a timely manner a procedural representative in an EU 27 member state to comply with the provisions of that Article.		WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF UNION PLANT VARIETY RIGHTS
Agriculture Plant variety rights	Actions to be taken by the Community Plant Variety Office (CPVO): The Examination Offices in the United Kingdom are entrusted for 864 botanical taxa. Out of those, there are 678 botanical taxa for which no other Examination Office is entrusted in the Union. The CPVO is managing the transfer of responsibilities to Examination offices in the EU 27 countries.		WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF UNION PLANT VARIETY RIGHTS
Agriculture Slaughterhouse operators	As of the withdrawal date, Council Regulation (EC) No 1099/2009 on the protection of animals at the time of killing no longer applies to the United Kingdom.		THE PROTECTION OF ANIMALS AT THE TIME OF KILLING, TO SLAUGHTERHOUSE OPERATORS
Agriculture Slaughterhouse operators	<b>Certificate of competence: As of the withdrawal date</b> Certificates of competence delivered in the United Kingdom pursuant to Article 21 of the Regulation will no longer be valid in the European Union from the moment the United Kingdom becomes a third country.		THE PROTECTION OF ANIMALS AT THE TIME OF KILLING, TO SLAUGHTERHOUSE OPERATORS
Agriculture Slaughterhouse operators	As of the withdrawal date Persons who hold such a certificate of competence and want to continue their professional activities in the European Union will have to apply for a new certificate in an EU 27 Member State.		THE PROTECTION OF ANIMALS AT THE TIME OF KILLING, TO SLAUGHTERHOUSE OPERATORS



Category	If no agreement is reached:	Consequence	EU Document
Agriculture Slaughterhouse operators	Slaughterhouse operators: As of the withdrawal date Slaughterhouse operators shall ensure that some operations are only carried out by persons holding a certificate of competence (cf. Article 7(2) of the Regulation). This requirement also applies to animal welfare officers who are working in a slaughterhouse (cf. Article 17(4) of the Regulation). Slaughterhouse operators are therefore invited to inform the persons concerned of the need to apply for a new certificate in an EU 27 Member State.		THE PROTECTION OF ANIMALS AT THE TIME OF KILLING, TO SLAUGHTERHOUSE OPERATORS
Agriculture Timber	As of the withdrawal date, the EU rules in the field of timber trade, in particular Regulation (EU) No 995/2010, Council Regulation (EC) No 2173/2005 establishing a Forest Law Enforcement, Governance and Trade (FLEGT) licencing scheme <sup>6</sup> and any related FLEGT Voluntary Partnership Agreements that the EU has concluded with third countries <sup>7</sup> , no longer apply to the United Kingdom.		WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF FIGHT AGAINST ILLEGAL LOGGING AND ASSOCIATED TRADE
Agriculture Timber	Operators have a due diligence obligation when placing timber or timber products on the market. As of the withdrawal date, this obligation applies to EU 27 operators who import timber and timber products from the United Kingdom – no matter where the timber was initially logged.		WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF FIGHT AGAINST ILLEGAL LOGGING AND ASSOCIATED TRADE
Agriculture Timber	<b>As of the withdrawal date</b> , the recognition as monitoring organisations of organisations established in the United Kingdom is no longer valid. They will not be in a position to carry out the tasks set out in Regulation (EU) No 995/2010.		WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF FIGHT AGAINST ILLEGAL LOGGING AND ASSOCIATED TRADE
Agriculture Timber	As of the withdrawal date, this scheme, including the FLEGT VPAs no longer applies to the United Kingdom.	<i>Council Regulation (EC) No 2173/2005 sets up the FLEGT licencing scheme. It allows for the control of the entry of timber to the EU from countries entering into bilateral FLEGT Voluntary Partnership Agreements (VPA) with the EU.</i>	WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF FIGHT AGAINST ILLEGAL LOGGING AND ASSOCIATED TRADE

Category	If no agreement is reached:	Consequence	EU Document
Agriculture Veterinary medicines	As of the withdrawal date, the EU rules in the field of medicinal products for human and veterinary use no longer apply to the United Kingdom.		Notice to marketing authorisation holders of centrally authorised medicinal products for human and veterinary use
Agriculture Veterinary medicines	EU law requires that marketing authorisation holders are established in the EU (or EEA); Some activities must be performed in the EU (or EEA), related for example to pharmacovigilance, batch release etc.		Notice to marketing authorisation holders of centrally authorised medicinal products for human and veterinary use
Agriculture Veterinary medicines	Marketing authorisation holders may be required to adapt processes and to consider changes to the terms of the marketing authorisation in order to ensure its continuous validity and exploitation, once the United Kingdom has left the Union.		Notice to marketing authorisation holders of centrally authorised medicinal products for human and veterinary use
Citizen Rights	As of the withdrawal date, the EU rules on the European citizens' initiative ("ECI Regulation") will no longer apply to the United Kingdom. <b><i>(This is the ability OF EU citizens to petition the EU to take certain actions. One million signatures are needed for a request to be considered)</i></b>	United Kingdom citizens can no longer be organisers of citizens' initiatives under the ECI Regulation which are ongoing on the withdrawal date or which have been launched on or after the withdrawal date.	WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF THE EUROPEAN CITIZENS' INITIATIVE
Citizen Rights	ECI Regulation (This is the ability OF EU citizens to petition the EU to take certain actions. One million signatures are needed for a request to be considered)	United Kingdom citizens or residents among the seven registered initiative organisers, <b>must be replaced by other EU national individuals as of the withdrawal date</b>	WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF THE EUROPEAN CITIZENS' INITIATIVE

Category	If no agreement is reached:	Consequence	EU Document
Citizen Rights	ECI Regulation (This is the ability OF EU citizens to petition the EU to take certain actions. One million signatures are needed for a request to be considered)	Statements of support submitted on the United Kingdom form will no longer be considered by the Commission unless they have been verified and certified under Article 8(1) of the ECI Regulation before the withdrawal date. <b>Applies to UK Citizens and EU citizens residing in the UK.</b>	WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF THE EUROPEAN CITIZENS' INITIATIVE
Citizen Rights	ECI Regulation (This is the ability OF EU citizens to petition the EU to take certain actions. One million signatures are needed for a request to be considered)	Statements of support submitted by the United Kingdom citizens residing in those Member States, which accept statements of support from their residents, will only be considered if collected before the withdrawal date. They can be verified and certified after the withdrawal date.	WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF THE EUROPEAN CITIZENS' INITIATIVE
Citizen Rights	ECI Regulation (This is the ability OF EU citizens to petition the EU to take certain actions. One million signatures are needed for a request to be considered)	As of the withdrawal date, any online collection system certified by the United Kingdom authorities in accordance with Article 6 of the ECI Regulation can no longer be used.	WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF THE EUROPEAN CITIZENS' INITIATIVE
Civil Justice	<b>International jurisdiction:</b> the rules on international jurisdiction in EU instruments in the area of civil and commercial law as well as family law no longer apply to judicial proceedings in the United Kingdom. International jurisdiction will be governed by the national rules of the State in which a court has been seized.	UK laws will apply in the UK.	WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF CIVIL JUSTICE AND PRIVATE INTERNATIONAL LAW

Category	If no agreement is reached:	Consequence	EU Document
Civil Justice	<b>Recognition and enforcement:</b> judgments issued in the United Kingdom are no longer recognised and enforced in EU Member States under the rules of the EU instruments in the area of civil and commercial law as well as family law, and vice versa.	<b>UK rulings will no longer be recognised and enforced in Ireland after the withdrawal date. Applies to Civil, commercial and family law. Irish rulings will no longer be recognised and enforced in the UK after the withdrawal date. Applies to Civil, commercial and family law.</b>	WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF CIVIL JUSTICE AND PRIVATE INTERNATIONAL LAW
Civil Justice	<b>Judicial cooperation procedures:</b> EU instruments facilitating judicial cooperation (e.g. in relation to the service of documents, taking of evidence or within the context of the European Judicial Network in Civil and Commercial Matters) no longer apply between EU Member States and the United Kingdom.	<b>Cooperation between the UK courts (and Northern Ireland) will become slower.</b>	WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF CIVIL JUSTICE AND PRIVATE INTERNATIONAL LAW
Civil Justice	<b>Specific EU procedures:</b> EU instruments making available specific procedures, in particular the European Payment Order Procedure or the European Procedure for Small Claims, will no longer be available in courts of the United Kingdom and will not be available in the courts of EU Member States where one or more parties are domiciled in the United Kingdom.	<b>UK small claims legislation will apply in the UK. UK residents cannot avail of EU procedures in courts in the EU 27.</b>	WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF CIVIL JUSTICE AND PRIVATE INTERNATIONAL LAW
Company Law	UK incorporated companies will be third country companies and therefore not automatically be recognised under Article 54 of the Treaty on the Functioning of the European Union by the Member States.	Depending on the applicable national or international law rules, <b>such companies might not have a legal standing in the EU and shareholders might be personally liable for the debts of the company.</b>	WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES ON COMPANY LAW

Category	If no agreement is reached:	Consequence	EU Document
Company Law	Member States will not be obliged to recognise the legal personality and limited liability of companies, which are incorporated in the United Kingdom, but have the central administration or the principal place of business in the EU 27.	Depending on the applicable national or international law rules, such companies might not have a legal standing in the EU and shareholders might be personally liable for the debts of the company.	WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES ON COMPANY LAW
Company Law	UK incorporated companies may be recognised in accordance with each Member State's national law (private international law rules concerning companies and the subsequently applicable substantive company law), or international law treaties.	Depending on the applicable national or international law rules, such companies might not have a legal standing in the EU and shareholders might be personally liable for the debts of the company.	WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES ON COMPANY LAW
Company Law	Branches in EU 27 Member States of United Kingdom incorporated companies will be branches of third country companies and rules relevant to branches of third country companies will apply.	<b>Irish company law will apply to these branches</b>	WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES ON COMPANY LAW
Company Law	EU law on disclosure, incorporation, capital maintenance and alteration, and cross-border mergers will no longer apply to the United Kingdom.	<b>UK law will apply to stakeholders, including employees, creditors and investors dealing with UK companies</b>	WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES ON COMPANY LAW
Company Law	EU rules on compulsory disclosure of certain company information in the business registers (such as documents and particulars related to instruments of constitution, appointment, termination of office and particulars of persons representing a company, the winding-up of a company or a change of the registered office) will no longer apply.	<b>UK law will apply to stakeholders, including employees, creditors and investors dealing with UK companies</b>	WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES ON COMPANY LAW
Company Law	EU law on access, including cross-border, to company information available in the EU business registers, no longer applies to the United Kingdom. This means that the United Kingdom business register will no longer be connected to the business registers interconnection system (BRIS); information about United Kingdom companies will no longer be available through the e-justice portal.	<b>EU business registers will no longer be notified about certain changes in relation to UK companies (changes to UK companies with a branch in EU 27; cross-border mergers involving at least one EU company and one UK company).</b>	WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES ON COMPANY LAW

Category	If no agreement is reached:	Consequence	EU Document
Company Law	The company law form of a European Company (SE) will no longer be available in the United Kingdom.	<b>UK form will apply</b>	WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES ON COMPANY LAW
Consumer Protection / Rights	EU courts will continue to apply the EU rules on consumer protection even though the trader is in the United Kingdom.	EU laws and rules on consumer protection will be enforced on UK traders selling to / in the EU.	WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES ON CONSUMER PROTECTION AND PASSENGER RIGHTS
Consumer Protection / Rights	According to EU law, where a consumer concludes a contract with a professional in another country who, by any means, directs his commercial activities to the consumer's country of residence, the contract is generally governed by the law of the country where the consumer has his or her habitual residence.	Irish consumers who trade with the UK will continue to be covered by Irish law.	WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES ON CONSUMER PROTECTION AND PASSENGER RIGHTS
Consumer Protection / Rights	EU jurisdictional rules which allow the consumer to sue the trader in the EU 27 Member State where the consumer is domiciled apply, irrespective of whether the trader is domiciled in the EU or in a third country	Irish consumers can still sue a UK trader in Ireland	WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES ON CONSUMER PROTECTION AND PASSENGER RIGHTS
Consumer Protection / Rights	the recognition and enforcement of an EU judgement in the United Kingdom and vice versa will be governed, as of the withdrawal date by national rules in the EU 27 and in the United Kingdom.	<b>After withdrawal any judgement made in favour of an Irish Consumer will now be enforceable under UK - Irish agreements not EU legislation.</b>	WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES ON CONSUMER PROTECTION AND PASSENGER RIGHTS
Consumer Protection / Rights	As of the withdrawal date, EU law ensuring the availability of out-of-court dispute resolution and facilitating access to alternative dispute resolution no longer applies to the United Kingdom and the EU online dispute resolution platform is no longer available in relation to traders established in the United Kingdom.	<b>New ways of dispute resolution will be required where an Irish consumer does not seek to sue the UK trader.</b>	WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES ON CONSUMER PROTECTION AND PASSENGER RIGHTS

Category	If no agreement is reached:	Consequence	EU Document
Consumer Protection / Rights	From the withdrawal date, United Kingdom authorities will not be obliged under EU law to cooperate in the case of cross-border claims.	<b>UK laws on cross border cooperation to resolve claims will apply.</b>	WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES ON CONSUMER PROTECTION AND PASSENGER RIGHTS
Consumer Protection / Rights	As of the withdrawal date, EU law giving to certain "qualified entities", designated by EU Member States, legal standing for bringing injunction actions in another Member State no longer applies to the United Kingdom.	<b>UK laws apply</b>	WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES ON CONSUMER PROTECTION AND PASSENGER RIGHTS
Consumer Protection / Rights	Package travel Organisers not established in the EU which sell or offer travel packages to consumers in the EU, or which by any means direct such activities to the EU, also must provide such insolvency protection in each of the Member States they are selling to.	<b>UK package travel suppliers must provide insolvency protection if the intent to continue to operate in the EU. Irish package travel organizers will now be covered by UK national law on insolvency protection.</b>	WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES ON CONSUMER PROTECTION AND PASSENGER RIGHTS
Consumer Protection / Rights	As of the withdrawal date, insolvency protection taken out in the United Kingdom no longer serves to comply with the requirements for insolvency protection of package travel organisers in the EU.	<b>Irish purchasers of UK established package travel products will not be covered by EU insolvency protection legislation.</b>	WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES ON CONSUMER PROTECTION AND PASSENGER RIGHTS
Consumer Protection / Rights	As of the withdrawal date, EU law on air passenger rights no longer applies to passengers departing from an airport located in the United Kingdom to an airport situated in the territory of a EU 27 Member State, unless the operating air carrier of the flight concerned is a Union carrier.eg Has an operating licence issued by an EU 27 country)	<b>To retain their EU rights when traveling from or through the UK after withdrawal an Irish citizen must travel with a community carrier.</b>	WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES ON CONSUMER PROTECTION AND PASSENGER RIGHTS
Consumer Protection / Rights	EU <b>Disability rights</b> will no longer apply to travel to, from or through the UK after the withdrawal date unless travel is provided by a community carrier.	<b>To retain their EU disability rights when traveling from or through the UK after withdrawal an Irish citizen must travel with a community carrier.</b>	WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES ON CONSUMER PROTECTION AND PASSENGER RIGHTS



Category	If no agreement is reached:	Consequence	EU Document
Consumer Protection / Rights	EU law on ship passenger rights continues to apply on and after the withdrawal date to passengers where the port of embarkation is in the EU 27 or in the United Kingdom, provided that the port of disembarkation is in the EU 27 and the service is operated by a carrier established within the territory of a Member State or offering passenger transport services to or from a Member State ("Union carrier").	<b>To retain their EU rights when traveling by ship from or through the UK after withdrawal an Irish citizen must travel with a community carrier (shipping / Ferry line).</b>	WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES ON CONSUMER PROTECTION AND PASSENGER RIGHTS
Consumer Protection / Rights	EU law on rights of passengers in bus and coach transport continues to apply on and after the withdrawal date to passengers travelling with regular services to or from the United Kingdom where the boarding or the alighting point of the passenger is situated in the EU 27, and the scheduled distance of the service is 250km or more.	<b>It is unclear if ad hoc (e.g.: unscheduled coach travel) coach travel for commercial or leisure purposes is covered by this provision.</b>	WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES ON CONSUMER PROTECTION AND PASSENGER RIGHTS
Consumer Protection / Rights	EU law on <b>rail passengers' rights</b> continues to apply on and after the withdrawal date to rail passenger services in the territory of the Union, provided that the railway undertaking is licensed in the EU.	<b>Eurostar and any other Chunnel rail travel supplier is covered by this provision.</b>	WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES ON CONSUMER PROTECTION AND PASSENGER RIGHTS
Eco Management / Audits	As of the withdrawal date, Regulation (EC) No 1221/2009 on the voluntary participation by organisations in a Community eco-management and audit scheme ("the EMAS Regulation") will no longer apply to the United Kingdom.	<i>The Eco-Management and Audit Scheme (EMAS) is a voluntary environmental management instrument, which was developed in 1993 by the European Commission. It enables organizations to assess, manage and continuously improve their environmental performance. The scheme is globally applicable and open to all types of private and public organizations.</i>	WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF THE COMMUNITY ECO-MANAGEMENT AND AUDIT SCHEME (EMAS)



Category	If no agreement is reached:	Consequence	EU Document
Eco Management / Audits	<b>EMAS REGISTRATIONS:</b> As from the withdrawal date, the EMAS Competent Body designated by the United Kingdom will lose its status. It will not be in the position to carry out the tasks described in the EMAS Regulation. It will be removed from the list of EMAS Competent Bodies on the EU EMAS website and its right to access the EMAS register database will be removed.		WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF THE COMMUNITY ECO-MANAGEMENT AND AUDIT SCHEME (EMAS)
Eco Management / Audits	<b>EMAS registrations:</b> As of the withdrawal date EMAS registrations awarded by the EMAS Competent Body designated by the United Kingdom are no longer valid and the EMAS logo can no longer be used by UK organisations.		WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF THE COMMUNITY ECO-MANAGEMENT AND AUDIT SCHEME (EMAS)
Eco Management / Audits	EMAS Post Brexit: As of the withdrawal date Organisations based in the United Kingdom can, as from the withdrawal date, apply for a new EMAS-global registration with an EU 27 EMAS Competent Body		WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF THE COMMUNITY ECO-MANAGEMENT AND AUDIT SCHEME (EMAS)
Eco Management / Audits	EMAS Post Brexit: As of the withdrawal date Organisations based in the United Kingdom can arrange for a transfer of the registration from the UK EMAS Competent Body to an EU 27 EMAS Competent Body.		WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF THE COMMUNITY ECO-MANAGEMENT AND AUDIT SCHEME (EMAS)
Eco Management / Audits	EMAS Regulation establishes the possibility for organisations established in the EU 27 to include sites located in third countries into one single corporate registration. <sup>7</sup>		WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF THE COMMUNITY ECO-MANAGEMENT AND AUDIT SCHEME (EMAS)

Category	If no agreement is reached:	Consequence	EU Document
Eco Management / Audits	<b>Accreditation Body: EMAS ENVIRONMENTAL VERIFIERS: As from the withdrawal date</b> , the EMAS Accreditation Body appointed by the United Kingdom will lose its status. It will not be in the position to carry out the tasks described in the EMAS Regulation. It will therefore be removed from the list of EMAS Accreditation and Licensing Bodies on the EU EMAS website.		WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF THE COMMUNITY ECO-MANAGEMENT AND AUDIT SCHEME (EMAS)
Eco Management / Audits	<b>Environmental Verifiers: EMAS ENVIRONMENTAL VERIFIERS: As from the withdrawal date</b> , EMAS environmental verifiers accredited by the United Kingdom's Accreditation Body will lose their status and will not be the position to carry out the tasks described in the EMAS Regulation.	Irish verifiers accredited by the UK accreditation body need to be recredited with an EU 27 EMAS accreditation body	WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF THE COMMUNITY ECO-MANAGEMENT AND AUDIT SCHEME (EMAS)
Ecommerce	Companies established in the United Kingdom providing information society services into the EU will fall under the jurisdiction of each individual EU 27 Member State.	Irish Ecommerce laws can be applied to UK based ecommerce companies selling to Irish Consumers. <b>UK ecommerce laws will apply to Irish ecommerce sites selling into the UK.</b>	WITHDRAWAL OF THE UNITED KINGDOM AND EU LEGISLATION IN THE FIELD OF ELECTRONIC COMMERCE AND NET NEUTRALITY
Ecommerce	The limitations of liability set out in the Directive on electronic commerce no longer apply to intermediary service providers established in the United Kingdom.	Liability limits no longer apply. Irish liability limitations can be applied. <b>Liability on Irish Ecommerce activities will be subject to UK laws.</b>	WITHDRAWAL OF THE UNITED KINGDOM AND EU LEGISLATION IN THE FIELD OF ELECTRONIC COMMERCE AND NET NEUTRALITY
Environment Waste	<b>As of the withdrawal date</b> , EU waste law no longer applies to the United Kingdom.		WITHDRAWAL OF THE UNITED KINGDOM AND EU WASTE LAW

Category	If no agreement is reached:	Consequence	EU Document
Environment Waste	TRANSBOUNDARY SHIPMENTS OF WASTE: EXPORTS as of the withdrawal date all exports of waste for disposal and the export of mixed municipal waste for recovery from the EU 27 to the United Kingdom will be prohibited.		WITHDRAWAL OF THE UNITED KINGDOM AND EU WASTE LAW
Environment Waste	<b>TRANSBOUNDARY SHIPMENTS OF WASTE: IMPORTS</b> as of the withdrawal date imports of waste from a third country party to the Basel Convention remains allowed, subject to the requirements set out in that Regulation (EC) No 1013/2006		WITHDRAWAL OF THE UNITED KINGDOM AND EU WASTE LAW
Environment Waste	<b>EU WASTE MANAGEMENT TARGETS AND RECOVERY OPERATIONS IN THIRD COUNTRIES:</b> Exports of waste electrical and electronic equipment for treatment in the United Kingdom will be counted towards the waste management targets		WITHDRAWAL OF THE UNITED KINGDOM AND EU WASTE LAW
Environment Waste	<b>EU WASTE MANAGEMENT TARGETS AND RECOVERY OPERATIONS IN THIRD COUNTRIES:</b> Exports of waste batteries and accumulators for treatment in the United Kingdom will be counted towards the waste management targets		WITHDRAWAL OF THE UNITED KINGDOM AND EU WASTE LAW
Environment Waste	<b>EU WASTE MANAGEMENT TARGETS AND RECOVERY OPERATIONS IN THIRD COUNTRIES:</b> Exports of municipal waste for preparation for reuse and recycling, and exports of construction and demolition waste for preparation for reuse, recycling and other material recovery in the United Kingdom will be counted towards the waste management targets		WITHDRAWAL OF THE UNITED KINGDOM AND EU WASTE LAW
Environment Waste	<b>EU WASTE MANAGEMENT TARGETS AND RECOVERY OPERATIONS IN THIRD COUNTRIES:</b> Exports of packaging and packaging waste can be counted towards the waste management targets		WITHDRAWAL OF THE UNITED KINGDOM AND EU WASTE LAW
Environment Waste	<b>EU WASTE MANAGEMENT TARGETS AND RECOVERY OPERATIONS IN THIRD COUNTRIES:</b> Exports of end-of life vehicles can be counted towards the waste management targets.	Old vehicles at the end of their life can be exported	WITHDRAWAL OF THE UNITED KINGDOM AND EU WASTE LAW

Category	If no agreement is reached:	Consequence	EU Document
Environment Waste	All exports are only permitted if there is sound evidence that the recovery and/or recycling in the United Kingdom takes place under conditions that are broadly equivalent to those prescribed by the Union legislation.		WITHDRAWAL OF THE UNITED KINGDOM AND EU WASTE LAW
Finance Banking services	As of the withdrawal date, the EU rules in the field of banking and payment services, in the internal market (PSD) will no longer apply to the United Kingdom.		WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF BANKING AND PAYMENT SERVICES
Finance Banking services	<b>AUTHORISATIONS: As of the withdrawal date</b> UK entities providing banking and payment services, as well as e-money issuing, will no longer benefit from the authorisation to provide those services and activities in the Union (they will lose the so-called "EU passport"). UK entities will no longer be allowed to provide services in the EU on the basis of their current authorisations.		WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF BANKING AND PAYMENT SERVICES
Finance Banking services	<b>Authorisations: Branches. As of the withdrawal date</b> UK entities authorised by United Kingdom competent authorities which have established branches in other Member States will have to comply with the rules of the host Member State applicable to branches of entities having their head office in a third country including the requirement to be validly authorised by the relevant competent authority of the host Member State in accordance with these rules. The services provided by these branches will as well be subject to the relevant requirements which are set out in the EU legal framework.	In Ireland, branches of banks established in the UK will have to comply with Irish and EU laws	WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF BANKING AND PAYMENT SERVICES
Finance Banking services	<b>Authorisations: Payment institutions: As of the withdrawal date</b> Payment institutions authorised by United Kingdom competent authorities, as of the withdrawal date, will not be allowed to provide payment services in the territory of the Union cross-border or through the use of branches located in the Member States. The services provided by these branches will as well be subject to the relevant requirements which are set out in the EU legal framework.		WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF BANKING AND PAYMENT SERVICES

Category	If no agreement is reached:	Consequence	EU Document
Finance Banking services	<b>Authorisations: Continued compliance: As of the withdrawal date</b> Entities authorised by the competent authorities in the Union, including their branches, have to comply with the conditions of their authorisation on a continued basis. The services provided by these branches will as well be subject to the relevant requirements which are set out in the EU legal framework.		WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF BANKING AND PAYMENT SERVICES
Finance Banking services	<b>Authorisations: UK Branches: As of the withdrawal date</b> where entities authorised by a competent authority in the EU have established branches in the United Kingdom, these branches will have to comply with the scope of the authorisation granted to the entities of which they are an integral legal part. This includes compliance with regard to their programme of operations and structural organisation and the requirement that the effective exercise of supervisory functions is not prevented by difficulties involved in the enforcement of the laws, regulations or administrative provisions of the third country. The services provided by these branches will as well be subject to the relevant requirements which are set out in the EU legal framework.		WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF BANKING AND PAYMENT SERVICES
Finance Banking services	<b>ARRANGEMENTS AND EXPOSURES: As of the withdrawal date</b> arrangements which may affect the ability of entities authorised in the EU to have an autonomous risk management and control framework, and sufficient operational resilience, including trading and hedging capabilities, in crisis will have to be assessed by the competent authority which has granted the authorisation.		WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF BANKING AND PAYMENT SERVICES
Finance Banking services	<b>ARRANGEMENTS AND EXPOSURES: As of the withdrawal date</b> the prudential treatment of exposures to third parties established in the United Kingdom will be affected.		WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF BANKING AND PAYMENT SERVICES

Category	If no agreement is reached:	Consequence	EU Document
Finance Banking services	<b>CONTRACTS: As of the withdrawal date</b> , the EU rules on conflicts of laws and jurisdictions will no longer apply to the United Kingdom. Where contracts are governed by the law of the United Kingdom, or contain a choice of law or an agreement in favour of the jurisdiction of a court in the United Kingdom, parties to those contracts should carefully assess the impact of the withdrawal of the United Kingdom on the validity and enforceability of those contracts and mitigate any risks, including any risks to their clients.	Irish residents with banking contracts with UK established banks should examine their contracts to ensure they are compliant with EU law after the UK withdraws from the EU.	WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF BANKING AND PAYMENT SERVICES
Finance Insurance	<b>As of the withdrawal date</b> , the EU rules in the field of insurance / reinsurance, setting out the framework governing the activities of insurance / reinsurance undertakings across the EU, the protection of policyholders and the distribution of insurance products no longer apply to the United Kingdom.	Check where insurance policies are issued from because people or businesses with Insurance contracts issued by UK established companies will no longer enjoy the same protection rights as contracts issues in Ireland or the EU.	WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF INSURANCE / REINSURANCE
Finance Insurance	<b>Service Provision: As of the withdrawal date</b> UK insurance undertakings will no longer benefit from the Solvency II authorisation to provide services in the Union (they will lose the so-called "EU passport") and will be third-country insurance undertakings.	<b>This means that those insurance undertakings will no longer be allowed to provide services in the EU, including through online sales, on the basis of their current authorisations.</b>	WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF INSURANCE / REINSURANCE
Finance Insurance	<b>Insurance Branches: As of the withdrawal date</b> , Branches of UK insurance undertakings in the EU will be branches of third country insurance undertakings. They will need an authorisation in the Member State of their activity to be able to continue to do business and have to comply with the EU conditions.	<b>Authorisation of a branch however does not grant the right to conduct business across the EU Member States, but only in the Member States that has granted the authorisation.</b>	WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF INSURANCE / REINSURANCE

Category	If no agreement is reached:	Consequence	EU Document
Finance Insurance	EU 27 Subsidiaries: As of the withdrawal date, EU 27 subsidiaries (legally independent companies established in EU 27 and controlled by or affiliated to insurance undertakings established in the United Kingdom) can continue to operate as EU insurance undertakings on the basis of their authorisation in the EU Member State of their establishment and subject to their compliance with the EU rules, including in terms of governance, risk management, and outsourcing.		WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF INSURANCE / REINSURANCE
Finance Insurance	<b>Reinsurance: As of the withdrawal date</b> , UK reinsurance undertakings will have to comply, for their EU business, with the conditions set by the EU Member State in which they carry out their activity. These conditions cannot be more favourable than those applying to reinsurance companies from the EU, but they may be less favourable and may well differ between EU Member States.		WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF INSURANCE / REINSURANCE
Finance Insurance	<b>INSURANCE CONTRACTS: As of the withdrawal date</b> , the loss of EU authorisation may affect the ability of UK insurance undertakings to continue performing certain obligations and activities and ensure service continuity with regard to contracts concluded before the withdrawal date.	<b>firms should assess the impact of the withdrawal of the United Kingdom from the European Union on their operations and contract portfolios and, also in cooperation with the relevant national supervisors, identify and mitigate risks.</b>	WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF INSURANCE / REINSURANCE
Finance Insurance	Information disclosure: <b>BEFORE the withdrawal date</b> , policyholders/customers should be informed about the impact on their rights and on the provision of insurance services that may emerge from the withdrawal of the United Kingdom from the EU, including the upcoming loss by the relevant insurance undertaking/intermediary of its EU authorisation.	<b>Before the UK withdraws from the EU policy holders and customers have to be informed of the risks and impacts of the withdrawal on them.</b>	WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF INSURANCE / REINSURANCE

Category	If no agreement is reached:	Consequence	EU Document
Finance Insurance	<b>Group Supervision:</b> Insurance / reinsurance undertakings operating in the EU but part of a group with the parent undertaking registered in the United Kingdom will be subject, in the absence of equivalence supervision, to the Solvency II provisions empowering EU supervisory authorities to require a worldwide group solvency or to apply other methods aiming to ensure appropriate group level supervision including the establishment of a holding company with head office in the Union.		WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF INSURANCE / REINSURANCE
Finance Insurance	Group-level internal model: As of the withdrawal date, any group-level internal model covering a UK group operating in the EU, approved by the UK Prudential Regulatory Authority before the withdrawal date will no longer be recognised in the EU as of the withdrawal date, and will require a new application and approval by an EU 27 supervisor.		WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF INSURANCE / REINSURANCE
Finance Insurance	Entity-level internal model: As of the withdrawal date, any entity-level internal model for a subsidiary of an UK insurance undertaking established in one of the EU 27 Member States and approved by the supervisor of that Member State will remain valid.		WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF INSURANCE / REINSURANCE
Finance Insurance	EU registration rights: As of the withdrawal date, Insurance / reinsurance intermediaries registered in the United Kingdom will no longer benefit from their EU registration rights and will therefore no longer be able to conduct business in the European Union on the basis of their UK registration.		WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF INSURANCE / REINSURANCE
Finance VAT	As of the withdrawal date Goods which enter the VAT territory of the EU from the United Kingdom or are dispatched or transported from the VAT territory of the EU to the United Kingdom will respectively be treated as importation or exportation of goods	<b>This implies charging VAT at importation, while exports are exempt from VAT.</b>	WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF CUSTOMS AND INDIRECT TAXATION



Category	If no agreement is reached:	Consequence	EU Document
Finance VAT	<b>As of the withdrawal date</b> , UK Taxable persons wishing to use one of the special schemes of the so-called Mini One-Stop Shop or MOSS), who supply telecommunications services, broadcasting services or electronic services to non-taxable persons in the EU, will have to be registered for the MOSS in a Member State of the EU.		WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF CUSTOMS AND INDIRECT TAXATION
Finance VAT	<b>As of the withdrawal date</b> , Taxable persons established in the United Kingdom purchasing goods and services or importing goods subject to VAT in a Member State of the EU who wish to claim a refund of that VAT may no longer file electronically.		WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF CUSTOMS AND INDIRECT TAXATION
Finance VAT	<b>As of the withdrawal date</b> a company established in the United Kingdom carrying out taxable transactions in a Member State of the EU may be required by that Member State to designate a tax representative as the person liable for payment of the VAT in accordance with the EU VAT Directive.		WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF CUSTOMS AND INDIRECT TAXATION
Finance Asset management	<b>As of the withdrawal date</b> , the EU rules in the field of asset management, in particular Directive 2009/65/EC on Undertakings for Collective Investment in Transferable Securities <sup>4</sup> and Directive 2011/61/EU on Alternative Investment Funds Managers <sup>5</sup> no longer apply to the United Kingdom.		WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF ASSET MANAGEMENT
Finance Asset management	<b>UK ASSET MANAGEMENT ACTIVITY: As of the withdrawal date</b> UK UCITS management companies and UK AIF managers will no longer benefit from authorisation <sup>7</sup> (they will lose the so-called "EU passport") and will be treated as third-country AIF managers. This means that those UK entities will no longer be able to manage funds and market funds in the EU on the basis of their current authorisations		WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF ASSET MANAGEMENT

Category	If no agreement is reached:	Consequence	EU Document
Finance Asset management	<b>As of the withdrawal date:</b> 1) For UCITS, EuVECA, EuSEF and ELTIF, both the investment funds and their managers must be established and registered or authorised in the EU to manage and market funds to retail and professional investors across the Union. 2) AIF managers need to be established and authorised in the EU to be allowed to manage and market AIFs to professional investors across the EU.		WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF ASSET MANAGEMENT
Finance Asset management	<b>As of the withdrawal date</b> all collective investment undertakings registered or authorised in the United Kingdom will be non-EU alternative investment funds (non-EU AIFs). This applies to: Undertakings for Collective Investment in Transferable Securities (UCITS), Alternative investment funds (AIFs); European Venture Capital Funds (EuVECA); European Social Entrepreneurship Funds (EuSEF); European Long Term Investment Funds (ELTIF); and Money Market Funds (MMF).		WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF ASSET MANAGEMENT
Finance Asset management	<b>As of the withdrawal date</b> Member States may allow AIF managers who are not established and authorised in the EU to market AIFs (EU AIFs and non-EU AIFs) only in their territory under the so-called National Private Placement regimes <sup>13</sup> (hereafter "NPPR"). Directive 2011/61/EU provides Member States with discretion as to whether to activate NPPR and allow for stricter rules in addition to the minimum requirements in that Directive. Some Member States do not allow for the NPPR, while other Member States only allow marketing to professional investors.		WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF ASSET MANAGEMENT
Finance Asset management	As of the withdrawal date UCITS management companies or AIF managers authorised by EU 27 competent authorities in accordance with Article 6 of Directive 2009/65/EC or Article 6 of Directive 2011/61/EU which are subsidiaries of entities established in the United Kingdom (legally independent companies established in EU 27 controlled by or affiliated to entities established in the United Kingdom) can continue to operate on the basis of their authorisation as UCITS management companies or AIF managers in the EU 27.		WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF ASSET MANAGEMENT

Category	If no agreement is reached:	Consequence	EU Document
Finance Asset management	<b>As of the withdrawal date</b> Branches of UK managers (permanent presences which are not legally independent from the AIF manager) in the EU will be treated as branches of a non-EU AIF managers as of the withdrawal date. These branches will be subject to the requirements of NPPRs, where available.		WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF ASSET MANAGEMENT
Finance Asset management	<b>EU ASSET MANAGEMENT ACTIVITY:</b> As of the withdrawal date, UCITS and AIFs authorised or registered in the United Kingdom in accordance with the Directive 2009/65/EC or Directive 2011/61/EU will be non-EU AIFs (see above). EU 27 UCITS management companies managing those (former) UCITS authorised in the UK will need to obtain an authorisation according to Article 6 of Directive 2011/61/EU to manage non-EU AIFs.		WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF ASSET MANAGEMENT
Finance Asset management	<b>EU ASSET MANAGEMENT ACTIVITY: As of the withdrawal date</b> , the management, by AIF managers established and authorised or registered in the EU, of non-EU AIFs that are not marketed in the EU must comply with Directive 2011/61/EU (except depositary and annual report rules) and cooperation agreements for exchange of information between EU competent authorities and the relevant third country authorities (Article 34 of Directive 2011/61/EU).		WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF ASSET MANAGEMENT
Finance Asset management	<b>EU ASSET MANAGEMENT ACTIVITY: As of the withdrawal date</b> According to Article 36 of Directive 2011/61/EU, the marketing of non-EU AIFs managed by an AIF manager established and authorised or registered in the EU is subject to the NPPR, which is an option for Member States. Stricter rules may be imposed on this category of AIF managers by Member States.		WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF ASSET MANAGEMENT
Finance Asset management	<b>EU ASSET MANAGEMENT ACTIVITY: Before of the withdrawal date</b> According to the rules on disclosure to investors in Directive 2009/65/EC and Directive 2011/61/EU, UCITS management companies and AIF managers must take a number of steps to inform investors of the consequences of the withdrawal of the United Kingdom from the EU		WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF ASSET MANAGEMENT

Category	If no agreement is reached:	Consequence	EU Document
Finance Asset management	<b>EU ASSET MANAGEMENT ACTIVITY as of the withdrawal date</b> UCITS depositaries need to demonstrate objective reasons for delegation and to ensure that in the event of an insolvency of that third party, the assets held in custody are unavailable for distribution among, or realisation for the benefit of, its creditors.		WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF ASSET MANAGEMENT
Finance Asset management	<b>EU ASSET MANAGEMENT ACTIVITY as of the withdrawal date</b> Non-EU AIF managed by an AIF manager established and authorised in the EU can appoint a depositary in the third country of the non-EU AIF subject to specific requirements		WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF ASSET MANAGEMENT
Finance Asset management	<b>EU ASSET MANAGEMENT ACTIVITY: Before of the withdrawal date</b> According to Article 22 of Directive 2011/61/EU, AIF managers must include in the annual report any material change to the information to be disclosed to investors, which includes, but is not limited to, the legal implications of the contractual relationship.		WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF ASSET MANAGEMENT
Finance Asset management	<b>EU ASSET MANAGEMENT ACTIVITY: Before of the withdrawal date</b> According to Article 78 of Directive 2009/65/EC, UCITS management companies must prepare a key investor information document whose essential elements must be kept up to date. This includes information on Member States in which the management company is authorised, where the UCITS is managed or marketed cross-border.		WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF ASSET MANAGEMENT
Finance Asset management	<b>EU ASSET MANAGEMENT ACTIVITY: Before of the withdrawal date</b> <b>UCITS</b> management companies and AIF managers must assess whether the change of the legal status of the investment fund would still be compliant with the investment strategy of the fund as communicated earlier to investors.		WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF ASSET MANAGEMENT
Finance Asset management	EU ASSET MANAGEMENT ACTIVITY: As of the withdrawal date as regards the assets in which EU funds invest, Directive 2009/65/EC and Directive 2011/61/EU do not prohibit investment in eligible assets located outside the EU. Nevertheless, there will be restrictions to fund-of-funds structures; in particular, UCITS authorised in the EU 27 must assess the eligibility of (former) UCITS authorised in the United Kingdom		WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF ASSET MANAGEMENT

Category	If no agreement is reached:	Consequence	EU Document
Finance Asset management	<b>EU ASSET MANAGEMENT ACTIVITY: Before the withdrawal date</b> EU investors should review their investment criteria to assess compliance with the change in the legal status of the funds they invested into (e.g. non-EU AIF instead of UCITS).		WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF ASSET MANAGEMENT
Finance Asset management	<b>EU ASSET MANAGEMENT ACTIVITY as of the withdrawal date</b> The delegation of certain operational functions to providers established in the United Kingdom may be undertaken provided that the relevant requirements in Directive 2009/65/EC and Directive 2011/61/EU are complied with.		WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF ASSET MANAGEMENT
Finance credit rating agencies	<b>As of the withdrawal date</b> , the EU rules in the field of the Credit Ratings Agencies (CRAs) and in particular Regulation (EC) No 1060/2009 of the European Parliament and of the Council of 16 September 2009 on credit rating agencies <sup>4</sup> ("CRA Regulation") no longer apply to the United Kingdom.		WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF CREDIT RATING AGENCIES
Finance credit rating agencies	<b>Deregistration. As of the withdrawal date</b> in accordance with Article 4(1) of the CRA Regulation, CRAs established in the EU need to be registered and supervised by the European Securities and Markets Authority (ESMA), in order for their ratings to be recognised for regulatory purposes in the EU. As CRAs established in the United Kingdom will no longer be considered established in the EU, ESMA will have to withdraw their registrations, in accordance with Articles 14 and 20 of the CRA Regulation.		WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF CREDIT RATING AGENCIES
Finance credit rating agencies	Use of ratings for regulatory purposes. As of the withdrawal date and as a consequence of UK established CRAs' deregistration, credit institutions, investment firms, insurance undertakings, reinsurance undertakings, institutions for occupational retirement provision, management companies, investment companies, alternative investment fund managers and central counterparties in the EU 27 will no longer be able to use ratings issued by these UK CRAs for regulatory purposes (e.g. Solvency II for insurance undertaking, Capital Requirements Regulation for credit institutions).		WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF CREDIT RATING AGENCIES

Category	If no agreement is reached:	Consequence	EU Document
Finance credit rating agencies	<b>Endorsement. As of the withdrawal date</b> Ratings issued by a CRA established in a third country which is part of a group to which a CRA established in the EU and registered by ESMA belongs can be "endorsed" provided that certain conditions are met in accordance with Article 4(3) CRA Regulation. <b>When "endorsed", ratings may be used for regulatory purposes.</b>		WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF CREDIT RATING AGENCIES
Finance credit rating agencies	<b>Prospectus. As of the withdrawal date</b> in accordance with Article 4(1) of the CRA Regulation where a prospectus contains a reference to a credit rating or credit ratings issued by a CRA established in the United Kingdom, it will need to include clear and prominent information stating that those credit ratings are not issued by a credit rating agency established in the EU and registered under the CRA Regulation.		WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF CREDIT RATING AGENCIES
Finance Excise duties	<b>As of the withdrawal date</b> The movement of goods which enter the excise territory of the EU from the United Kingdom or are dispatched or transported from the excise territory of the EU to the United Kingdom will respectively be treated as importation or exportation of excise goods	The importation or export of excise goods will require additional documentation and may be subject to additional taxes and duties.	WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF CUSTOMS AND INDIRECT TAXATION
Finance Excise duties	<b>As of the withdrawal date</b> The Excise Movement and Control System (EMCS) on its own will no longer be applicable to excise duty suspended movements of excise goods from the EU into the United Kingdom, but those movements will be treated as exports, where excise supervision ends at the place of exit from the EU. Movements of excise goods to the United Kingdom will therefore require an export declaration as well as an electronic administrative document (e-AD).	<b>This applies to all alcohol products and other excisable products</b>	WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF CUSTOMS AND INDIRECT TAXATION
Finance Excise duties	<b>As of the withdrawal date</b> Movements of excise goods from the United Kingdom to the EU will have to be released from customs formalities before a movement under EMCS can begin.	<b>This applies to all alcohol products and other excisable products</b>	WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF CUSTOMS AND INDIRECT TAXATION

Category	If no agreement is reached:	Consequence	EU Document
Finance financial instruments	<b>As of the withdrawal date</b> , the EU rules in the field of MiFID investment services and activities no longer apply to the United Kingdom.		WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF MARKETS IN FINANCIAL INSTRUMENTS
Finance financial instruments	<b>As of the withdrawal date</b> UK investment firms will no longer benefit from the MiFID authorisation <sup>6</sup> to provide MiFID investment services and activities in the Union (they will lose the so-called "EU passport") and will be third-country firms. This means that those investment firms will no longer be allowed to provide services in the EU on the basis of their current authorisations.		WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF MARKETS IN FINANCIAL INSTRUMENTS
Finance financial instruments	EU 27 subsidiaries: As of the withdrawal date (legally independent companies established in EU 27 and controlled by or affiliated to investment firms established in the United Kingdom) can continue to operate as EU investment firms if they have a MiFID authorisation in one of the EU Member States.		WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF MARKETS IN FINANCIAL INSTRUMENTS
Finance financial instruments	Branches: As of the withdrawal date Branches in the EU 27 of UK established investment firms will be branches of third country investment firms and will need to comply with national requirements applicable in the Member State where the branch is established or with the regime set in Article 39-41 MiFID II where applicable. The provision of services / activities is limited to that Member State's territory.		WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF MARKETS IN FINANCIAL INSTRUMENTS
Finance financial instruments	<b>As of the withdrawal date</b> UK market operators / investment firms operating a trading venue or execution venue will no longer benefit from the MiFID authorisation/licence. UK based regulated markets (RMs), multilateral trading facilities (MTFs) or systematic internalisers (SI) will thus cease to be eligible venues for trading shares subject to the MiFIR share trading obligation; EU counterparts can no longer undertake trades in shares subject to the trading obligation on such platforms.		WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF MARKETS IN FINANCIAL INSTRUMENTS
Finance financial instruments	<b>As of the withdrawal date</b> UK based RMs, MTFs or organised trading facilities (OTFs) will cease to be eligible venues for the purposes of the MiFIR derivatives trading obligation <sup>12</sup> and EU counterparts will no longer be able to undertake trades on these platforms. In both cases, EU counterparts would need to reassess their trading arrangements to		WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF MARKETS IN FINANCIAL INSTRUMENTS



Category	If no agreement is reached:	Consequence	EU Document
	ensure continued compliance with their obligations under the MiFID framework.		
Finance financial instruments	<b>As of the withdrawal date</b> Where previously available, UK based trading venues and CCPs <sup>13</sup> will no longer benefit from the open and non-discriminatory access to EU trading venues and EU central counterparties (CCPs) and to EU benchmarks respectively.		WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF MARKETS IN FINANCIAL INSTRUMENTS
Finance financial instruments	<b>CONTRACTS: As of the withdrawal date</b> The loss of MiFID authorisations may also impact relationships with EU clients/counterparts and may affect the ability of UK established firms to continue performing certain obligations and activities deriving from existing contracts. Under MiFID firms are required to take measures to ensure continuity in the performance of investment services and activities. To this end, firms should assess the impact of the withdrawal of the United Kingdom from the EU on their operations and identify and mitigate compliance risks.		WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF MARKETS IN FINANCIAL INSTRUMENTS
Finance financial instruments	<b>CONTRACTS: As of the withdrawal date</b> EU established firms dealing in financial instruments subject to the MiFID trading obligation would no longer be able to use certain UK established firms/venues.		WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF MARKETS IN FINANCIAL INSTRUMENTS
Finance financial instruments	<b>CONTRACTS: As of the withdrawal date</b> clients can no longer have direct electronic access to EU established trading venues via UK established firms.		WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF MARKETS IN FINANCIAL INSTRUMENTS



Category	If no agreement is reached:	Consequence	EU Document
Finance financial instruments	<b>CONTRACTS: As of the withdrawal date</b> UK established UCITS will become non-EU AIFs and EU established investment firms may be no longer able to distribute them to their clients, unless the relevant AIFMD provisions are complied with.		WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF MARKETS IN FINANCIAL INSTRUMENTS
Finance financial instruments	<b>As of the withdrawal date</b> The outsourcing of certain operational functions to UK providers may be undertaken only when in compliance with relevant MiFID requirements. In particular, the outsourcing of functions related to portfolio management to UK entities will only be permitted where the conditions under Article 32 of the MiFID Delegated Regulation 2017/565 are met, including the requirement that cooperation arrangements between National Competent Authorities and UK competent authorities are in place.	<i>The European Securities and Markets Authority (ESMA) has issued opinions with specific clarifications on these matters, in particular on the risks of letter-box entities which may arise from the use of outsourcing arrangements or from the use of non-EU branches for the performance of functions/services with respect to EU clients</i>	WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF MARKETS IN FINANCIAL INSTRUMENTS
Finance financial instruments	<b>As of the withdrawal date</b> According to Article 59 MiFID II, the provision of data reporting services requires an authorisation by the home Member State competent authority. UK based data reporting service providers which have not obtained a MiFID authorisation by a competent authority established in the EU will have to cease to serve EU markets		WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF MARKETS IN FINANCIAL INSTRUMENTS
Finance post trade services	<b>As of the withdrawal date</b> , EU rules on financial markets, in particular Regulation (EU) No 648/2012 of the European Parliament and of the Council of 4 July 2012 on OTC derivatives, central counterparties and trade repositories (EMIR), Regulation (EU) No 600/2014 of the European Parliament and of the Council of 15 May 2014 on markets in financial instruments and amending Regulation (EU) No 648/20126 (MIFIR), Regulation (EU) 2015/2365 of the European Parliament and of the Council of 25 November 2015 on transparency of securities financing transactions and of reuse and amending Regulation (EU) No 648/20127 (SFTR), Directive 98/26/EC of the European Parliament and of the Council of 19 May 1998 on settlement finality in payment and securities settlement systems (SFD), no longer apply to the United Kingdom.		WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF POST-TRADE FINANCIAL SERVICES

Category	If no agreement is reached:	Consequence	EU Document
Finance post trade services	<b>DERIVATIVES: As of the withdrawal date</b> , derivatives traded on a UK regulated market will no longer fulfil the definition of exchange traded derivatives (ETDs) under EU law. According to Article 2(32) of MIFIR, ETDs are derivatives traded on an EU regulated market, or on a third-country market considered to be equivalent. Thus, under EU law, as of the withdrawal date, ETDs traded on a UK regulated market will be over-the-counter (OTC) derivative contracts.		WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF POST-TRADE FINANCIAL SERVICES
Finance post trade services	<b>DERIVATIVES: As of the withdrawal date</b> , An ETD that becomes an OTC derivative will thus become subject to all EMIR requirements applicable to OTC derivatives transactions: all OTC derivatives transactions count towards the calculation of the clearing threshold in accordance with the provisions of EMIR11, and will be subject to the EMIR clearing obligation where one has been adopted as well as certain risk mitigation techniques (notably the exchange of margins).		WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF POST-TRADE FINANCIAL SERVICES
Finance post trade services	<b>DERIVATIVES: As of the withdrawal date</b> CCPs established in the United Kingdom will be third-country CCPs which would need to be recognised under EMIR before they could be used to fulfil the clearing obligation. Counterparties will not be able to fulfil their clearing obligation under EMIR in CCPs established in the United Kingdom as long as those CCPs are not recognised by ESMA under EMIR.		WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF POST-TRADE FINANCIAL SERVICES
Finance post trade services	<b>DERIVATIVES: As of the withdrawal date</b> The obligation to clear transactions through an authorised CCP established in the EU or a recognised CCP established in a third country also applies to counterparties established in third countries, where the contract has a direct, substantial and foreseeable effect within the EU or where such an obligation is necessary or appropriate to prevent the evasion of any provisions of EMIR.		WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF POST-TRADE FINANCIAL SERVICES

Category	If no agreement is reached:	Consequence	EU Document
Finance post trade services	<b>DERIVATIVES: As of the withdrawal date</b> The loss of EU authorisation of CCPs established in the United Kingdom will affect their ability to continue performing certain activities (e.g. compression) and fulfilling certain obligations (e.g. default management) with regard to contracts concluded before the withdrawal date.		WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF POST-TRADE FINANCIAL SERVICES
Finance post trade services	<b>DERIVATIVES: As of the withdrawal date</b> A higher capital charge will apply to exposures resulting from positions in derivatives held by credit institutions and investment firms established in the EU in non-recognised CCPs established in third countries. This is because only authorised CCPs established in the EU and recognised CCPs established in a third country are qualifying CCPs (QCCPs) which have a favourable treatment under CRR.		WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF POST-TRADE FINANCIAL SERVICES
Finance post trade services	<b>DERIVATIVES: Before the withdrawal date</b> Counterparties in the EU and counterparties in third countries to which the clearing obligation applies should therefore examine their derivatives portfolios. All counterparties (including counterparties established in third countries), be they financial institution or a non-financial company above the clearing threshold, should ensure that they fulfil the clearing requirements. Where derivatives are concluded via an intermediary or cleared via an intermediary (i.e. clearing member, client of a clearing member or an indirect client), counterparties should ensure that their contract with that intermediary duly complies with the applicable legal requirements.		WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF POST-TRADE FINANCIAL SERVICES
Finance post trade services	<b>TRADE REPOSITORIES AND REPORTING: As of the withdrawal date,</b> trade repositories established in the United Kingdom will be third-country trade repositories.		WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF POST-TRADE FINANCIAL SERVICES

Category	If no agreement is reached:	Consequence	EU Document
Finance post trade services	<b>TRADE REPOSITORIES AND REPORTING: As of the withdrawal date</b> , the obligation to report a derivative contract to a duly registered or recognised trade repository is addressed to the counterparties. All counterparties, be they financial or non-financial, must ensure that this requirement is fulfilled. Where reporting to a trade repository is delegated to a third party, counterparties should ensure that their contract guarantees compliance with all applicable legal requirements in EMIR and/or SFTR.		WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF POST-TRADE FINANCIAL SERVICES
Finance post trade services	<b>TRADE REPOSITORIES AND REPORTING: As of the withdrawal date</b> , the requirement for counterparties to keep a record of any derivative contract that has been concluded and of any modification thereto must continue to be fulfilled by counterparties for at least five years following the termination of the contract.		WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF POST-TRADE FINANCIAL SERVICES
Finance post trade services	<b>TRADE REPOSITORIES AND REPORTING: As of the withdrawal date</b> , systems currently designated by the United Kingdom will lose their designation under the Settlement Finality Directive along with the rights and benefits that entails for them and their participants. This is without prejudice to any specific provisions in national law of Member States.		WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF POST-TRADE FINANCIAL SERVICES
Finance statutory audits	<b>As of the withdrawal date</b> , the EU rules in the field of statutory audit (in particular the Statutory Audit Directive <sup>5</sup> ) no longer apply to the United Kingdom.		WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF STATUTORY AUDIT
Finance statutory audits	<b>ENTITLEMENT TO CARRY OUT STATUTORY AUDITS IN THE EU: As of the withdrawal date</b> , natural persons approved as auditors by the United Kingdom (United Kingdom auditors) will be considered third country auditors and they will no longer be considered statutory auditors for the purpose of the Statutory Audit Directive.		WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF STATUTORY AUDIT

Category	If no agreement is reached:	Consequence	EU Document
Finance statutory audits	<b>ENTITLEMENT TO CARRY OUT STATUTORY AUDITS IN THE EU: As of the withdrawal date, Audit</b> entities approved by the United Kingdom (United Kingdom audit entities) will be considered third country audit entities and will no longer be considered audit firms for the purpose of the Statutory Audit Directive.		WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF STATUTORY AUDIT
Finance statutory audits	<b>ENTITLEMENT TO CARRY OUT STATUTORY AUDITS IN THE EU: As of the withdrawal date, Neither</b> United Kingdom auditors nor United Kingdom audit entities will be entitled to carry out statutory audits required by the law of a Member State in accordance with the Statutory Audit Directive.		WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF STATUTORY AUDIT
Finance statutory audits	ENTITLEMENT TO CARRY OUT STATUTORY AUDITS IN THE EU: before the withdrawal date an audit firm approved in a Member State (EU 27) should carefully examine whether it will continue, as of the withdrawal date, complying with the conditions set out in Article 3(4) of the Statutory Audit Directive, in particular in relation to voting rights and members of the administrative or management body of the audit firm.		WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF STATUTORY AUDIT
Finance statutory audits	<b>REGISTRATION OF THIRD-COUNTRY AUDITORS AND AUDIT ENTITIES: As of the withdrawal date,</b> a United Kingdom auditor or United Kingdom audit entity providing an audit report concerning the annual or consolidated accounts of a company incorporated outside the EU whose transferable securities are admitted to trading on a regulated market of an EU Member State will have to be registered in that Member State as third country auditor or third country audit firm, in accordance with Article 45 of the Statutory Audit Directive. <b>Failing such registration, any such audit report will have no legal effect in the Member State concerned.</b>		WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF STATUTORY AUDIT

Category	If no agreement is reached:	Consequence	EU Document
Finance statutory audits	<p><b>REGISTRATION OF THIRD-COUNTRY AUDITORS AND AUDIT ENTITIES:</b>  <b>As of the withdrawal date,</b> United Kingdom auditors or United Kingdom audit entities registered in accordance with Article 45 of the Statutory Audit Directive will in principle be subject to the systems of public oversight, quality assurance and investigation and penalties of the Member State of registration (cf. Article 45(3) of the Statutory Audit Directive).</p>		WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF STATUTORY AUDIT
Finance statutory audits	<p><b>As of the withdrawal date</b> Statutory audit of consolidated accounts of undertakings in the EU that have subsidiaries in the United Kingdom: In accordance with Article 27 (on statutory audits of consolidated financial statements) of the Statutory Audit Directive, the statutory auditor or audit firm approved in a Member State acting as group auditor of an undertaking in the EU will need to take into account, in respect of the audit of that undertaking's subsidiaries in the United Kingdom, that the relevant United Kingdom auditor or United Kingdom audit entity will be considered as third-country auditor or third-country audit entity for the purpose of the requirements of that Article (e.g. the audit work of the United Kingdom auditor or United Kingdom audit entity will be subject to evaluation and review by the group auditor).</p>		WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF STATUTORY AUDIT

Category	If no agreement is reached:	Consequence	EU Document
Finance statutory audits	<p><b>Cooperation of EU statutory auditors and audit firms with competent authorities of the United Kingdom: As of the withdrawal date,</b> In accordance with Article 23(5), second subparagraph (on confidentiality and professional secrecy) of the Statutory Audit Directive, the statutory auditor or audit firm approved in a Member State that carries out the statutory audit of an undertaking in the EU which forms part of a group of undertakings whose parent undertaking is in the United Kingdom or of an undertaking in the EU which has issued securities in the United Kingdom may only transfer audit working papers or other documents related to the audit of the audited undertaking in the EU to the competent authorities of the United Kingdom under the conditions set out in Article 47 of the Statutory Audit Directive. In particular, this requires the agreement of the Member State concerned and the existence of reciprocity arrangements between the competent authorities.</p>		WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF STATUTORY AUDIT
Food Animal Feed	<p><b>UK applicants (natural or legal persons) requesting to update the list of PARNUTs (<i>general provisions for the following limited number of well-established and defined categories of food that are considered as essential for certain vulnerable groups of the population: infant formula and follow-on formula, processed cereal based food and baby food, food for special medical purposes; and total diet replacement for weight control</i>)</b> for which the authorisation is not yet granted, because it is in process of evaluation or authorisation, have to designate a representative established within the EU or the EEA and communicate its contact details to the European Commission.</p>		WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES ON ANIMAL FEED
Food Ecolabel	<p>As from the withdrawal date the EU Ecolabel Competent Body designated by the United Kingdom will not be in the position to carry out the tasks described in the EU Ecolabel Regulation.</p>	<p><b>Eco labelling of new Irish products for the UK market will have to be done in the UK and comply with UK not EU standards</b></p>	WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES FOR THE USE OF THE EU ECOLABEL

Category	If no agreement is reached:	Consequence	EU Document
Food Ecolabel	After withdrawal EU Ecolabels awarded by the EU Ecolabel Competent Body designated by the United Kingdom can no longer be used on products placed on the EU 27 market as of the withdrawal date, and on associated promotional material.	UK products entering the EU must comply with all EU Eco labelling requirements and regulations.	WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES FOR THE USE OF THE EU ECOLABEL
Food Ecolabel	Irish economic operators hold an EU Ecolabel contract issued by the UK Ecolabel Competent Body prior to the withdrawal date and plan to continue using the EU Ecolabel when placing the product concerned on the EU 27 market	<i><b>Two Options (1) apply for a new licence, (2) Arranging for a transfer – on the basis of a contractual arrangement between the holder of the EU Ecolabel, the UK Ecolabel Competent Body, and the EU 27 Ecolabel Competent Body - of the file and the corresponding contract from the UK Ecolabel Competent Body to an EU 27 Ecolabel Competent Body.</b></i>	WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES FOR THE USE OF THE EU ECOLABEL
Food Law	As of the withdrawal date, EU food law no longer applies to the United Kingdom.	<b>UK law will apply to all imports of food to the UK. EU food regulations and laws will apply to all food products exported from the UK and NI.</b>	WITHDRAWAL OF THE UNITED KINGDOM AND EU FOOD LAW
Food Law	<b>Food Labelling:</b> EU food labelling rules apply to all food placed on the EU market, independently of the place of production of the food.	<b>EU food labelling laws apply to all food products being imported to the EU from the UK. UK food labelling laws apply to all Irish food products being exported to the UK.</b>	WITHDRAWAL OF THE UNITED KINGDOM AND EU FOOD LAW
Food Law	Changes to UK food product labels for import to the EU: Mandatory presentation of the origin of a food product, where the presentation refers to EU or non-EU; Mandatory labelling of the name or business name and address of the EU 27 importer of food from the United Kingdom; Mandatory health or identification marks including the name of the country (in full or with the ISO two-letter code) where the establishment is located.	<b>As of the withdrawal date any Imports of food products or ingredients from the UK to Ireland will have to comply to EU labelling laws.</b>	WITHDRAWAL OF THE UNITED KINGDOM AND EU FOOD LAW



Category	If no agreement is reached:	Consequence	EU Document
Food Law	<b>Ingredients, Composition, Contaminants, Residues, Packaging:</b> EU law on food ingredients and food composition, as well as EU law setting limits for contaminants and residues in food, applies to all food placed on the EU market, independently of the place of production of the food. The same applies for food contact material (wrapping, packaging etc.).	<b>As of the withdrawal date any Imports of food products or ingredients from the UK to Ireland will have to comply to EU labelling laws.</b>	WITHDRAWAL OF THE UNITED KINGDOM AND EU FOOD LAW
Food Law	According to EU food law, in some instances the food business operators, authorisation holders, or their representatives have to be established in the EU. As of the withdrawal date, establishment in the United Kingdom no longer complies with this requirement.	UK food business operators may have to register in each of the EU 27 in order to operate in that country. <b>Irish food business operators may have to register to operate in the UK.</b>	WITHDRAWAL OF THE UNITED KINGDOM AND EU FOOD LAW
Food Law	Food of animal origin: As of the withdrawal date, the importation of food of animal origin from the United Kingdom into the EU 27 is prohibited, unless certain requirements are met: The United Kingdom is "listed" by the Commission for public and animal health purposes, The establishment in the United Kingdom from which the food is dispatched, and obtained or prepared in, is "listed" by the Commission for public health purposes, The United Kingdom is "listed" by the Commission as having a residue control plan approved, The imported food satisfies all food hygiene requirements.	<b>Food of animal origin exported from Ireland for processing in the UK will have to comply with UK rules when needing exported and if then reimported to Ireland will have to comply to all EU third country food import regulations.</b>	WITHDRAWAL OF THE UNITED KINGDOM AND EU FOOD LAW
Food Law	Importing food from the UK: As of the withdrawal date, these substantial requirements are controlled upon entry into the EU 27 by applying mandatory border checks at the first point of entry into the Union territory: This food can only enter the EU 27 through approved "border inspection posts, Each consignment undergoes documentary and identity checks, as well as at an appropriate frequency physical checks, Each consignment has to be accompanied by a certificate in compliance with EU food legislation.	<b>Food of animal origin exported from Ireland for processing in the UK will have to comply with UK rules when being exported and if then reimported to Ireland, only at designated entry points, and will have to comply to all EU third country food import regulations.</b>	WITHDRAWAL OF THE UNITED KINGDOM AND EU FOOD LAW

Category	If no agreement is reached:	Consequence	EU Document
Food Law	<p><b>Food of non-animal origin:</b> The importation of food of non-animal origin is not subject to listing requirements of third countries and establishments. Member States must carry out regular official controls on imported food of non-animal origin. Those controls are organised on the basis of the multi-annual national control plan and in the light of potential risks. The controls must cover all aspects of the food legislation.</p>	<p><b>Importation of non-animal food products and ingredients is easier but the import of certain fruits and vegetables is subject to specific requirements. The import of food listed in Annex V to Directive 2000/29/EC (some of them subject to the import requirements mentioned in the previous point) requires a phytosanitary certificate. They are also subject to identity and physical controls, though at specified minimum frequencies depending on the risk that they present.</b></p>	<p>WITHDRAWAL OF THE UNITED KINGDOM AND EU FOOD LAW</p>
Food Law	<p>Irradiated food: Food treated with ionising radiation is regulated by EU law.<sup>52</sup> As of the withdrawal date, the import of irradiated food from the United Kingdom into the EU 27 is prohibited, unless the irradiation facilities in the United Kingdom are "listed" by the Commission.</p>	<p><b>Irish importers of irradiated foods can only import from suppliers who are listed with the EU Commission.</b></p>	<p>WITHDRAWAL OF THE UNITED KINGDOM AND EU FOOD LAW</p>
Food Law	<p><b>Recycled Plastics and materials that come in contact with food:</b> authorisation holders shall notify to the Commission manufacturing or recycling sites in third countries in which the authorised recycling process of plastic materials and articles takes place.</p>	<p><b>Materials that come in contact with food that is to be imported to the EU must comply with EU regulations especially if it contains recycled plastic.</b></p>	<p>WITHDRAWAL OF THE UNITED KINGDOM AND EU FOOD LAW</p>

Category	If no agreement is reached:	Consequence	EU Document
Food Law	<b>Certificates for organic production:</b> As of the withdrawal date the certificates issued by control authorities and bodies in the United Kingdom are no longer valid. The import of organic products from the United Kingdom will be subject to the listing rules of the EU.	<b>Irish organic products may need to be certified / approved in the UK.</b> Only products satisfying the requirements of EU Regulations can bear terms referring to the organic production method (e.g. organic, bio, eco, etc.) or the EU organic logo. <b>UK organic certificates will no longer be valid after the withdrawal date. They will not be able to be labelled with the EU organic logo.</b>	WITHDRAWAL OF THE UNITED KINGDOM AND EU FOOD LAW
Food Mineral Waters	As of the withdrawal date, the EU rules in the field of the exploitation and marketing of natural mineral waters apply to the United Kingdom as third country.		WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF THE EXPLOITATION AND MARKETING OF NATURAL MINERAL WATERS.
Food Mineral Waters	UK Waters may only be marketed as natural mineral waters in the European Union if they comply with where waters are extracted from the ground of a Member State, the responsible authority of that Member State has recognised the waters as natural mineral waters	UK mineral waters will have to be certified in Ireland as being mineral waters if they wish to be sold in Ireland	WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF THE EXPLOITATION AND MARKETING OF NATURAL MINERAL WATERS.

Category	If no agreement is reached:	Consequence	EU Document
Food Mineral Waters	As of the withdrawal date Waters currently extracted from the ground of, and recognised by the United Kingdom as natural mineral waters shall be considered as extracted from the ground of a third country and should no longer be authorised for import into the European Union, unless they are recognised as such by the responsible authority of another Member State.	UK mineral waters will have to be certified in Ireland as being mineral waters if they wish to be sold in Ireland	WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF THE EXPLOITATION AND MARKETING OF NATURAL MINERAL WATERS.
Food Mineral Waters	As of the withdrawal date Waters currently extracted from the ground of a third country and recognised as natural mineral waters by the responsible authority of the United Kingdom should no longer be authorised for import into the European Union, unless they are recognised as such by the responsible authority of another Member State.	Mineral waters imported to the UK from a third country and then destined to be exported to the EU will have to be certified in Ireland as being mineral waters if they wish to be sold in Ireland	WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF THE EXPLOITATION AND MARKETING OF NATURAL MINERAL WATERS.
Internet Net Neutrality	Regulation (EU) 2015/2120 on open internet provides for common rules on equal and non-discriminatory treatment of traffic in the provision of internet access services and related end-users' rights.	Present rules will continue to govern the provision of UK supplied internet access services into the EU 27 market. UK laws will apply the provision of internet access services and related end-users' rights.	WITHDRAWAL OF THE UNITED KINGDOM AND EU LEGISLATION IN THE FIELD OF ELECTRONIC COMMERCE AND NET NEUTRALITY
Internet Data Protection	<b>Personal Data Transfer:</b> As of the withdrawal date, the EU rules for transfer of personal data to third countries apply. These are the same as for transferring any personal data to a non EU 27 country.		WITHDRAWAL OF THE UNITED KINGDOM FROM THE UNION AND EU RULES IN THE FIELD OF DATA PROTECTION
Internet Data Protection	In the absence of an “adequacy decision” or of “appropriate safeguards” a transfer or a set of transfers may take place on the basis of so-called “derogations”: they allow transfers in specific cases, such as based on consent, for the performance of a contract, for the exercise of legal claims or for important reasons of public interest.		WITHDRAWAL OF THE UNITED KINGDOM FROM THE UNION AND EU RULES IN THE FIELD OF DATA PROTECTION

Category	If no agreement is reached:	Consequence	EU Document
Internet Data Protection	Safeguards may be provided for by: * <b>Standard data protection clauses:</b> the Commission has adopted three sets of model clauses which are available on the Commission's website; * <b>Binding corporate rules:</b> legally binding data protection rules approved by the competent data protection authority which apply within a corporate group; * <b>Approved Codes of Conduct</b> together with binding and enforceable commitments of the controller or processor in the third country; * <b>Approved certification mechanisms</b> together with binding and enforceable commitments of the controller or processor in the third country.		WITHDRAWAL OF THE UNITED KINGDOM FROM THE UNION AND EU RULES IN THE FIELD OF DATA PROTECTION
Internet Domain Names	<b>As of the withdrawal date</b> the EU regulatory framework for the .eu Top Level Domain will no longer apply to the United Kingdom		WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES ON .EU DOMAIN NAMES
Internet Domain Names	<b>REGISTRATION AND RENEWAL OF DOMAIN NAMES: As of the withdrawal date</b> , undertakings and organisations that are established in the United Kingdom but not in the EU and natural persons who reside in the United Kingdom will no longer be eligible to register .eu domain names or, if they are .eu registrants, to renew .eu domain names registered before the withdrawal date.	UK businesses, people and residents will no longer be able to register or renew a .EU domain.	WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES ON .EU DOMAIN NAMES
Internet Domain Names	<b>Registrars: As of the withdrawal date</b> Accredited .eu Registrars will not be entitled to process any request for the registration of or for renewing registrations of .eu domain names by those UK undertakings, organisations and persons.	Registrars will have to ignore all new or renewal requests from UK businesses, people and residents	WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES ON .EU DOMAIN NAMES
Internet Domain Names	<b>REVOCATION OF REGISTERED DOMAIN NAMES: As of the withdrawal date</b> and as a result of the withdrawal of the United Kingdom, a holder of a domain name who no longer fulfil the general EU eligibility criteria, the Registry for .eu will be entitled to revoke such domain name on its own initiative and without submitting the dispute to any extrajudicial settlement of conflicts.	.EU domains presently owned by UK businesses, people and residents who no longer are compliant with EU regulations can have their domain rescinded without notice	WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES ON .EU DOMAIN NAMES

Category	If no agreement is reached:	Consequence	EU Document
Internet Domain Names	RIGHTS THAT CAN BE INVOKED IN PROCEDURES FOR THE REVOCATION OF SPECULATIVE AND ABUSIVE REGISTRATIONS: As of the withdrawal date, rights recognised or established by the United Kingdom, but not by EU 27 Member States or by the Union, can no longer be invoked in procedures. By contrast, rights recognised by the Member States or by the Union, arising from international instruments, are not affected.		WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES ON .EU DOMAIN NAMES
Internet Domain Names	<b>RIGHTS THAT CAN BE INVOKED IN PROCEDURES FOR THE REVOCATION OF SPECULATIVE AND ABUSIVE REGISTRATIONS:</b> A registered domain name shall be subject to revocation, using an appropriate extra-judicial or judicial procedure, where that name is identical or confusingly similar to a name in respect of which a right is recognised or established by national and/or Union law and where the registered domain name was the subject of speculative and abusive registration		WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES ON .EU DOMAIN NAMES
Internet Domain Names	<b>APPLICABLE LAW IN AGREEMENTS BETWEEN ACCREDITED .EU REGISTRARS AND .EU REGISTRANTS:</b> agreements between the Registrar and the registrant of a .eu domain name cannot designate, as applicable law, a law other than the law of a EU Member State, nor can they designate a dispute-resolution body, unless selected by the .eu Top Level Domain Registry, nor an arbitration court or a court located outside the EU.	Only EU 27 jurisdictions can be used in .EU domain dispute procedures	WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES ON .EU DOMAIN NAMES
Internet Domain Names	<b>APPLICABLE LAW IN AGREEMENTS BETWEEN ACCREDITED .EU REGISTRARS AND .EU REGISTRANTS:</b> Should any such agreement designate as applicable law the law of the United Kingdom, the Registrar and registrant concerned are advised to amend the relevant agreement accordingly so that it complies with Article 5, first subparagraph, of Regulation (EC) No 874/2004 as of the withdrawal date.	Any .EU domain holder in the EU 27 member states that has the UK as the applicable Jurisdiction will need to change the jurisdiction to comply to EU regulations before the withdrawal date.	WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES ON .EU DOMAIN NAMES

Category	If no agreement is reached:	Consequence	EU Document
Internet E signatures	<b>As of the withdrawal date</b> , Regulation (EU) No 910/2014 on electronic identification and trust services for electronic transactions in the internal market no longer applies to the United Kingdom		WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF ELECTRONIC IDENTIFICATION AND TRUST SERVICES FOR ELECTRONIC TRANSACTIONS
Internet E signatures	<b>TRUST SERVICES:</b> "Qualified trust services" can only be provided by EU-based trust service providers or by trust service providers established in a third country which has an international agreement with the EU on the recognition of trust services	Unapproved UK trust services cannot be provided in the EU 27 after the withdrawal date	WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF ELECTRONIC IDENTIFICATION AND TRUST SERVICES FOR ELECTRONIC TRANSACTIONS
Internet E signatures	As of the withdrawal date, trust service providers established in the United Kingdom will be third country trust service providers. Trust services provided by trust service providers established in the United Kingdom will not be considered as "qualified trust services" in the EU.	UK suppliers are not to be considered as qualified trust services in the EU	WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF ELECTRONIC IDENTIFICATION AND TRUST SERVICES FOR ELECTRONIC TRANSACTIONS
Internet E signatures	<b>ELECTRONIC IDENTIFICATION SCHEMES:</b> As of the withdrawal date, electronic identification schemes which may have been notified by the United Kingdom before the withdrawal date will no longer be recognised by EU 27 Member States.	When an electronic identification means and authentication is required under national law or by administrative practice to access a service provided by a public sector body online in one Member State, the electronic identification means issued in another Member State shall be recognised in the first Member State for the purposes of cross-border authentication for that service online, provided that certain conditions are met	WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF ELECTRONIC IDENTIFICATION AND TRUST SERVICES FOR ELECTRONIC TRANSACTIONS

Category	If no agreement is reached:	Consequence	EU Document
Internet Security	<b>As of the withdrawal date</b> the EU rules in the field of security of network and information systems no longer apply to the United Kingdom.		WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF SECURITY OF NETWORK AND INFORMATION SYSTEMS
Internet Security	Where a digital service provider is established in the Union, it will be, subject to the jurisdiction of the Member State where it has its main establishment, which in principle corresponds to the place where the provider has its head office in the Union.		WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF SECURITY OF NETWORK AND INFORMATION SYSTEMS
Internet Security	Where a digital service provider, is not established in the Union but offers digital services into the Union, it must, in accordance with Article 18(2) of Directive (EU) 2016/1148, designate a representative in the Union. A representative means any natural or legal person established in the Union explicitly designated to act on behalf of a digital service provider not established in the Union.		WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF SECURITY OF NETWORK AND INFORMATION SYSTEMS
Internet Security	<b>As of the withdrawal date</b> , a digital service provider subject to the jurisdiction of the United Kingdom before the withdrawal date because its main establishment in the EU was in the United Kingdom may be subject to the following: <b>If the digital service provider maintains one or several establishments in the EU27 Member States, it will be deemed to be under the jurisdiction of the EU27 Member State where it has its main establishment in the EU27, thus effectively resulting in a change of competent authority.</b>		WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF SECURITY OF NETWORK AND INFORMATION SYSTEMS
Internet Security	<b>As of the withdrawal date</b> , a digital service provider subject to the jurisdiction of the United Kingdom before the withdrawal date because its main establishment in the EU was in the United Kingdom may be subject to the following: <b>If the digital service provider is no longer established in the EU27 but offers digital services into the EU27, it will be subject to the obligation to designate a representative in an EU27 Member State</b>		WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF SECURITY OF NETWORK AND INFORMATION SYSTEMS



Category	If no agreement is reached:	Consequence	EU Document
<b>Internet Security</b>	A digital service provider neither established in the EU27 nor in the United Kingdom but subject to the jurisdiction of the United Kingdom before the withdrawal date because it had designated a representative in the United Kingdom in accordance with Article 18(2) will, as of the withdrawal date, be subject to the obligation to designate a representative in an EU27 Member State.		WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF SECURITY OF NETWORK AND INFORMATION SYSTEMS
<b>Internet Security</b>	The national competent authority, as understood under Article 8 of Directive (EU) 2016/1148, of that Member State where the digital service provider concerned has either its main establishment or has designated a representative, will receive notifications of incidents taking place within the Union and will exercise ex post supervisory control.		WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF SECURITY OF NETWORK AND INFORMATION SYSTEMS
<b>Media Audio-visual</b>	As of the withdrawal date, the EU rules in the field of audio-visual media services will no longer apply to the United Kingdom		WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF AUDIOVISUAL MEDIA SERVICES
<b>Media Audio-visual</b>	COUNTRY OF ORIGIN AND JURISDICTION: "Country-of-Origin" principle, according to which media service providers shall, as a "Country-of-Origin" principle, according to which media service providers shall, as a general rule, be subject only to the law and the jurisdiction of their EU Member State of origin (as determined in the Directive 2010/13/EU4), including when their programmes are received and/or re-transmitted in other EU Member States.		WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF AUDIOVISUAL MEDIA SERVICES
<b>Media Audio-visual</b>	As of the withdrawal date, audio-visual media services providers currently under the jurisdiction of United Kingdom authorities (for example because they are established in the United Kingdom within the meaning of the Directive), may fall under the jurisdiction of one of the EU 27 Member States if the criteria laid down in Article 2 of the Audio-visual Media Services Directive are fulfilled.		WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF AUDIOVISUAL MEDIA SERVICES

Category	If no agreement is reached:	Consequence	EU Document
Media Audio-visual	As of the withdrawal date EU 27 Member States will be free to take whatever measures they will deem appropriate with regard to audio-visual media services coming from the United Kingdom as a third country and not satisfying the conditions laid down in Article 2 of the Audio-visual Media Services Directive, provided they comply with Union law and the international obligations of the Union		WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF AUDIOVISUAL MEDIA SERVICES
Media Audio-visual	<b>COUNTRY OF ORIGIN AND FREEDOM OF TRANSMISSION / RECEPTION:</b> As of the withdrawal date, audio-visual media services of United Kingdom media service providers received or retransmitted in the EU will no longer benefit from the freedom of reception and retransmission laid down in Article 3 of the Audio-visual Media Services Directive.		WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF AUDIOVISUAL MEDIA SERVICES
Media Audio-visual	As of the withdrawal date EU 27 Member States will be entitled, based on their own national law and, where applicable, within the limits of the European Convention on Transfrontier Television, to restrict reception and retransmission of audio-visual media services originating from the United Kingdom.		WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF AUDIOVISUAL MEDIA SERVICES
Media Audio-visual	Under its Articles 13, 16 and 17, the Audio-visual Media Services Directive lays down specific rules for the promotion of distribution and production of European works, such as minimum quota reserved for European works. Article 1(1)(n) of the current Audio-visual Media Services Directive considers as “European” works originating in European Third States party to the European Convention on Transfrontier Television of the Council of Europe and fulfilling the conditions of paragraph 3 of the above mentioned Article. <b>Therefore, pursuant to the current version of the Directive and without prejudice to any change to the legal framework, works originating in United Kingdom are considered European works even after the withdrawal date for the purpose of fulfilling the quotas under Article 13, 16 and 17 of the Directive.</b>		WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF AUDIOVISUAL MEDIA SERVICES
Media Copyright	As of the withdrawal date, the EU rules in the field of copyright will no longer apply to the United Kingdom.		WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF COPYRIGHT

Category	If no agreement is reached:	Consequence	EU Document
Media Copyright	THE MAIN INTERNATIONAL (MULTILATERAL) COPYRIGHT TREATIES WILL GOVERN THE EU-UNITED KINGDOM RELATIONSHIP IN THE FIELD OF COPYRIGHT: In accordance with the obligations under these agreements and in particular the principles of 'national treatment' and 'most favoured nation' of nationals and legal persons that meet the criteria of eligibility for protection within the scope of the TRIPS Agreement, the international framework will govern as of the withdrawal date:	<i>The Agreement on Trade-Related Aspects of Intellectual Property Rights is an international legal agreement between all the member nations of the World Trade Organization.</i>	WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF COPYRIGHT
Media Copyright	<b>Broadcasting from the UK: As of the withdrawal date,</b> broadcasters in the United Kingdom will no longer benefit from the mechanism provided for by the Directive 93/83/EEC when providing cross-border satellite broadcasting services to EU customers and they will have to clear rights in all Member States where the signal reaches.		WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF COPYRIGHT
Media Copyright	<b>Broadcasting to the UK: As of the withdrawal date</b> Broadcasters in the EU will no longer be able to benefit from the mechanism provided for by the Directive when providing cross-border satellite broadcasting services to customers in the United Kingdom and they will have to secure clearance of the rights of all relevant right holders if they wish to broadcast to the United Kingdom.		WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF COPYRIGHT
Media Copyright	<b>Collective Rights Management (online rights in musical works): As of the withdrawal date,</b> EU collective management organisations will not be subject to the obligation to represent collective management organisations based in the United Kingdom for multi-territorial licensing in accordance with Article 30 of Directive 2014/26/EU and vice versa.		WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF COPYRIGHT

Category	If no agreement is reached:	Consequence	EU Document
Media Copyright	<p><b>Orphan Works: As of the withdrawal date</b>, the mechanism of mutual recognition provided for by Directive 2012/28/EU will no longer apply between the United Kingdom and the EU. Consequently, orphan works which have been recognised in the United Kingdom by the withdrawal date will no longer be recognised in the EU under Directive 2012/28/EU and the same will apply for orphan works recognised in the EU, as the system of mutual recognition under Directive 2012/28/EU will no longer be available in the United Kingdom. As a consequence, this means that the uses of orphan works from the United Kingdom allowed under the Directive, notably as regards making them available online, will no longer be allowed for cultural institutions in the EU and vice versa.</p>		WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF COPYRIGHT
Media Copyright	<p><b>Access to published works for persons who are blind, visually impaired or otherwise print-disabled: As of the withdrawal date</b>, persons in the United Kingdom will no longer be able to obtain accessible format copies from authorised entities in the EU under the framework provided for by Directive (EU) 2017/1564. Conversely, authorised entities and beneficiary persons in the EU will not be able to obtain accessible format copies from authorised entities in the United Kingdom either. It is important to note, that the United Kingdom is currently not a party to the Marrakesh Treaty which governs transfers of materials between the EU and third countries.</p>		WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF COPYRIGHT
Media Copyright	<p><b>Online content Portability: As of the withdrawal date</b>, persons residing in the United Kingdom will no longer benefit from their digital content subscriptions (internet) when travelling to the EU; and a provider of online content services established in the United Kingdom will need to comply with the rules of the relevant EU Member State or States where it wishes to offer services to its subscribers – including the need to clear all relevant rights for that or those Member States.</p>		WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF COPYRIGHT

Category	If no agreement is reached:	Consequence	EU Document
Media Copyright	<b>Sui generis database right: As of the withdrawal date</b> , United Kingdom nationals (unless they have their habitual residence in the EU) and companies/firms formed in accordance with the law of the United Kingdom will no longer be entitled to maintain or obtain a sui generis database right in respect of databases in the EU. Conversely, EU Member States nationals and companies/firms will not be entitled to maintain or obtain a sui generis database right in respect of databases in the United Kingdom.	<i>A sui generis database right is considered to be a property right, comparable to but distinct from copyright, that exists to recognise the investment that is made in compiling a database, even when this does not involve the "creative" aspect that is reflected by copyright.</i>	WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF COPYRIGHT
Media Geoblocking	<b>As of the withdrawal date</b> , Regulation (EU) 2018/3024 on addressing unjustified geo-blocking and other forms of discrimination based on customers' nationality, place of residence or place of establishment within the internal market will no longer apply to the United Kingdom.		WITHDRAWAL OF THE UNITED KINGDOM AND EU LEGISLATION IN THE FIELD OF GEO-BLOCKING
Media Geoblocking	<b>CUSTOMERS: As of the withdrawal date</b> , natural persons residing in the United Kingdom (unless they have a nationality of a Member State) or undertakings established in the United Kingdom will not be able to benefit from Regulation (EU) 2018/302. Internet ecommerce		WITHDRAWAL OF THE UNITED KINGDOM AND EU LEGISLATION IN THE FIELD OF GEO-BLOCKING
Media Geoblocking ecommerce	<b>CUSTOMERS: As of the withdrawal date</b> natural persons residing in the United Kingdom (unless they have a nationality of a Member State) or undertakings established in the United Kingdom who wish to access websites in the EU will not benefit from the aforementioned ban related to access to traders' online interfaces. This means that a trader could block, limit or redirect those customers to specific versions of his/her internet website which might be different from the one that the customers initially sought to access. Internet ecommerce		WITHDRAWAL OF THE UNITED KINGDOM AND EU LEGISLATION IN THE FIELD OF GEO-BLOCKING

Category	If no agreement is reached:	Consequence	EU Document
Media Geoblocking ecommerce	<b>CUSTOMERS: As of the withdrawal date</b> natural persons residing in the United Kingdom (unless they have a nationality of a Member State) or undertakings established in the United Kingdom will not have the guarantee to be able to "shop like a local" in the EU in the situations covered by Article 4 of the Regulation, including benefitting from the same prices and conditions relating to the delivery of goods and services as the locals (i.e. the customers of the trader's home Member State). Internet ecommerce		WITHDRAWAL OF THE UNITED KINGDOM AND EU LEGISLATION IN THE FIELD OF GEO-BLOCKING
Media Geoblocking ecommerce	<b>CUSTOMERS: As of the withdrawal date</b> natural persons residing in the United Kingdom (unless they have a nationality of a Member State) or undertakings established in the United Kingdom using payment means from the United Kingdom will not be protected against traders applying different conditions for a payment transaction from the ones offered to EU customers, or refused to complete the purchase for reasons related to payment, when (wanting to) pay electronically for goods or services. Internet ecommerce		WITHDRAWAL OF THE UNITED KINGDOM AND EU LEGISLATION IN THE FIELD OF GEO-BLOCKING
Media Geoblocking ecommerce	<b>TRADERS: As of the withdrawal date</b> traders who are established in the United Kingdom and offer their goods or services to customers in the EU will continue to be bound by the rules established by the Regulation (EU) 2018/302 in respect of those activities. Internet ecommerce		WITHDRAWAL OF THE UNITED KINGDOM AND EU LEGISLATION IN THE FIELD OF GEO-BLOCKING
Media Telecoms	<b>As of the withdrawal date</b> , the EU rules in the field of electronic communications no longer apply to the United Kingdom		WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF ELECTRONIC COMMUNICATIONS
Media Telecoms	GENERAL AUTHORISATION: As of the withdrawal date, providers of electronic communications networks and/or services established in the United Kingdom will cease to benefit from the general authorisation regime within the EU 27 Member States. Hence, EU 27 Member States may impose additional authorisation requirements on providers established in the United Kingdom. Furthermore, providers established in the United Kingdom will cease to have the right to request providers authorised in the EU 27 Member States which are not 'major suppliers' to negotiate access and interconnection.	Moreover, they will not have the right to request or be subject to the dispute resolution procedure within the EU, neither for disputes within a Member State nor for cross-border access disputes.	WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF ELECTRONIC COMMUNICATIONS

Category	If no agreement is reached:	Consequence	EU Document
Media Telecoms	<b>FIXED AND MOBILE TERMINATION RATES:</b> As of the withdrawal date, the EU's regulatory framework leading to low wholesale voice termination rates will no longer apply to EU service providers as regards calls between the EU and the United Kingdom. This may lead to increases in the wholesale termination rates for calls from the EU to the United Kingdom and ultimately to increased retail tariffs for such calls. Mobile phone		WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF ELECTRONIC COMMUNICATIONS
Media Telecoms Roaming	<b>ROAMING Providers: As of the withdrawal date</b> the United Kingdom becomes a third country for the purposes of EU rules on roaming. Providers of roaming services to roaming customers operating in the EU: 1) will no longer benefit, when requesting wholesale roaming access, from the obligation of mobile network operators operating in the United Kingdom to meet all reasonable requests for providing wholesale roaming access. 2) will no longer benefit from the EU rules on maximum wholesale roaming charges that visited network operators operating in the United Kingdom may charge for the provision of wholesale roaming services within the EU. Mobile phone		WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF ELECTRONIC COMMUNICATIONS
Media Telecoms Roaming	<b>Roaming Customers: As of the withdrawal date</b> roaming customers of roaming providers operating in the EU: 1) will no longer benefit from the retail obligation of their roaming provider not to levy any surcharge in addition to the domestic retail price on them for the use in the United Kingdom of roaming services (calls made or received, SMS messages sent and data services), subject to fair use. 2) will continue to benefit from the transparency obligations laid down in Article 14 of Regulation (EU) 531/2012 (voice and SMS) and Article 15 of Regulation (EU) 531/2012 (data services) when travelling to the United Kingdom. Mobile phone		WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF ELECTRONIC COMMUNICATIONS



Category	If no agreement is reached:	Consequence	EU Document
<b>Media Telecoms Roaming</b>	<b>Roaming providers operating in the United Kingdom:</b> As of the withdrawal date 1) will no longer benefit, when requesting wholesale roaming access, from the obligation of mobile network operators operating in the EU to meet all reasonable requests for providing wholesale roaming access. 2) will no longer benefit from the EU rules on maximum wholesale roaming charges that visited network operators operating in the EU may charge for the provision of wholesale roaming services within the EU. Mobile phone		WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF ELECTRONIC COMMUNICATIONS
<b>Media Telecoms Roaming</b>	<b>Roaming customers of roaming providers operating in the United Kingdom: As of the withdrawal date</b> 1) will no longer benefit from the EU rules on the retail obligation of their roaming provider not to levy any surcharge in addition to the domestic retail price on them for the use within the EU of roaming services (calls made or received, SMS messages sent and data services), subject to fair use. 2) will no longer benefit from the EU rules on the transparency obligations laid down in Article 14 of Regulation (EU) 531/2012 (voice and SMS) and Article 15 of Regulation (EU) 531/2012 (data services) when travelling to the EU. Mobile phone		WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF ELECTRONIC COMMUNICATIONS
<b>Media Trademarks and Design</b>	As of the withdrawal date, EU rules on EU trade marks and Community designs will no longer apply to the United Kingdom.		WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES FOR TRADEMARKS AND COMMUNITY DESIGNS
<b>Media Trademarks and Design</b>	As of the withdrawal date As a result, EU trademarks and registered Community designs registered in accordance with Union law (Regulation (EU) 2017/1001 on the European Union trade mark <sup>4</sup> and Regulation (EC) No 6/2002 on the Community designs <sup>5</sup> ) as well as unregistered Community designs made available to the public in the manner provided for in Union law (Regulation (EC) No 6/2002) before the withdrawal date will continue to be valid in the EU27 Member States but will have no longer effect in the United Kingdom as from the withdrawal date. Any application for an EU trade mark or for a registered Community design pending before the withdrawal date will no longer cover the United Kingdom as from that date.		WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES FOR TRADEMARKS AND COMMUNITY DESIGNS



Category	If no agreement is reached:	Consequence	EU Document
Media Trademarks and Design	Any right granted by the European Union Intellectual Property Office on or after the withdrawal date will only cover the EU27 Member States. All existing seniority claims in EU trade marks based on national trade mark rights in the United Kingdom will cease to have an effect in the EU as from the withdrawal date.		WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES FOR TRADEMARKS AND COMMUNITY DESIGNS
Media Trademarks and Design	The holders of international registrations of trademarks and designs having designated the European Union before the withdrawal date pursuant to the Madrid system for the international registration of marks and The Hague system for the international deposit of industrial designs, should consider that, as from that date, those international registrations will continue to be valid in the EU27 Member States only and thus will no longer have effect in the United Kingdom.		WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES FOR TRADEMARKS AND COMMUNITY DESIGNS
Media Trademarks and Design	In particular, the following should be considered by right-holders and applicants: Natural or legal persons that are domiciled or have a seat in the United Kingdom only will have to be represented before the European Union Intellectual Property Office in accordance with Article 120(1) of Regulation (EU) 2017/1001 (on the European Union trade mark) and Article 78(1) of the Regulation (EC) No 6/2002 (on Community designs) in all proceedings provided for in those two Regulations, other than the filing of an application for an EU trade mark or an application for a registered Community design.		WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES FOR TRADEMARKS AND COMMUNITY DESIGNS
Medical Products	<b>As of the withdrawal date</b> the EU rules in the field of medicinal products for human and veterinary use no longer apply to the United Kingdom.		Questions and Answers related to the United Kingdom's withdrawal from the European Union with regard to the medicinal products for human and veterinary use within the EU

Category	If no agreement is reached:	Consequence	EU Document
Medical Products	<b>Impact:</b> EU law requires that marketing authorisation holders are established in the EU (or EEA); Some activities must be performed in the EU (or EEA), related for example to pharmacovigilance, batch release etc.	<i>Marketing authorisation holders may be required to adapt processes and to consider changes to the terms of the marketing authorisation in order to ensure its continuous validity and exploitation, once the United Kingdom has left the Union. Marketing authorisation holders will need to act sufficiently in advance to avoid any impact on the continuous supply of medicines for human and veterinary use within the European Union.</i>	Questions and Answers related to the United Kingdom's withdrawal from the European Union with regard to the medicinal products for human and veterinary use within the EU
Medical Products	An authorisation to place the product on the market granted by a United Kingdom competent authority before the withdrawal date is to be considered as the first authorisation to place the product on the market in the European Union		WITHDRAWAL OF THE UNITED KINGDOM AND EU LEGISLATION IN THE FIELD OF SUPPLEMENTARY PROTECTION CERTIFICATES FOR MEDICINAL PRODUCTS AND PLANT PROTECTION PRODUCTS
Medical Products	APPLICATIONS FOR SUPPLEMENTARY PROTECTION CERTIFICATES AS OF THE WITHDRAWAL DATE IN THE UNITED KINGDOM: As of the withdrawal date, Regulation (EC) No 469/2009 and Regulation (EC) No 1610/96 no longer apply to the United Kingdom.		WITHDRAWAL OF THE UNITED KINGDOM AND EU LEGISLATION IN THE FIELD OF SUPPLEMENTARY PROTECTION CERTIFICATES FOR MEDICINAL PRODUCTS AND PLANT PROTECTION PRODUCTS

Category	If no agreement is reached:	Consequence	EU Document
Medical Products	<b>As of the withdrawal date</b> , Regulation (EC) No 469/2009 of the European Parliament and of the Council of 6 May 2009 concerning the supplementary protection certificate for medicinal products <sup>4</sup> and Regulation (EC) No 1610/96 of the European Parliament and of the Council of 23 July 1996 concerning the creation of a supplementary protection certificate for plant protection products <sup>5</sup> will no longer apply to the United Kingdom.		WITHDRAWAL OF THE UNITED KINGDOM AND EU LEGISLATION IN THE FIELD OF SUPPLEMENTARY PROTECTION CERTIFICATES FOR MEDICINAL PRODUCTS AND PLANT PROTECTION PRODUCTS
Medical Products	CALCULATION OF DURATION OF SUPPLEMENTARY PROTECTION CERTIFICATES IN THE EU 27: As of the withdrawal date an authorisation to place the product on the market granted by a United Kingdom competent authority will not be considered a first authorisation to place the product on the market in the European Union.		WITHDRAWAL OF THE UNITED KINGDOM AND EU LEGISLATION IN THE FIELD OF SUPPLEMENTARY PROTECTION CERTIFICATES FOR MEDICINAL PRODUCTS AND PLANT PROTECTION PRODUCTS
Medicine Human Materials	<b>Blood and blood components:</b> imports of blood and blood components from the United Kingdom will need to be tested in conformity with the Union testing requirements. They will also need to meet equivalent standards of quality and safety	EU standards and regulations remain in force for items of this type being imported to the EU.	WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF SUBSTANCES OF HUMAN ORIGIN (BLOOD, TISSUES AND CELLS, AND ORGANS)
Medicine Human Materials	<b>Tissues and cells:</b> Imports of tissues and cells from the United Kingdom will have to be undertaken by authorised importing tissue establishments and meet standards of quality and safety equivalent rules for export of tissues or cells to third countries.	EU standards and regulations remain in force for items of this type being imported to the EU.	WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF SUBSTANCES OF HUMAN ORIGIN (BLOOD, TISSUES AND CELLS, AND ORGANS)

Category	If no agreement is reached:	Consequence	EU Document
Medicine Human Materials	Organs: exchange of organs with the United Kingdom will need to be supervised by a EU 27 competent authority or European organ exchange organisations (where the Member State delegates the supervision to them) and meet quality and safety requirements equivalent to those laid down in the Union legislation.	EU standards and regulations remain in force for items of this type being imported to the EU.	WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF SUBSTANCES OF HUMAN ORIGIN (BLOOD, TISSUES AND CELLS, AND ORGANS)
Medicine Human Materials	Traceability: In accordance with the EU legislation, in all cases, blood, tissues and cells, and organs will need to be traceable from donor to recipient and vice versa.	EU traceability standards and regulations remain in force.	WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF SUBSTANCES OF HUMAN ORIGIN (BLOOD, TISSUES AND CELLS, AND ORGANS)
Pensions	<b>As of the withdrawal date</b> , the EU rules for IORPs, and in particular Directive (EU) 2016/2341 of the European Parliament and of the Council of 14 December 2016 on the activities and supervision of institutions for occupational retirement provision no longer apply to the United Kingdom.	<i>Occupational pension funds or Institutions for Occupational Retirement Provision (IORPs) are financial institutions which manage collective retirement schemes for employers, in order to provide retirement benefits to their employees (the scheme members and beneficiaries).</i>	WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF INSTITUTIONS FOR OCCUPATIONAL RETIREMENT PROVISION
Pensions	As of the withdrawal date, this means that those UK IORPs will no longer be allowed to operate, on the basis of their current registration/authorisation as IORPs for members or beneficiaries whose relationship with the sponsoring undertaking is governed by the social and labour law relevant to the field of occupational pension schemes of an EU 27 Member State (hereafter "EU 27 members and beneficiaries").	The assets will be in the United Kingdom and members and beneficiaries will have to rely on UK national law to have access to their assets.	WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF INSTITUTIONS FOR OCCUPATIONAL RETIREMENT PROVISION

Category	If no agreement is reached:	Consequence	EU Document
<b>Pensions</b>	As of the withdrawal date, IORPs registered or authorised in the United Kingdom will have to comply, with regard to activities related to EU 27 members and beneficiaries, with the rules of the host Member State applicable to activities of IORPs registered or authorised in a third country. These rules may require a registration or authorisation by the relevant competent authority of the host Member State in accordance with the applicable national rules.		WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF INSTITUTIONS FOR OCCUPATIONAL RETIREMENT PROVISION
<b>Pensions</b>	IORP registration or authorisation does not grant the right to conduct business across the EU Member States, but is limited to the Member State that has granted the registration or authorisation.		WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF INSTITUTIONS FOR OCCUPATIONAL RETIREMENT PROVISION
<b>Pensions</b>	Before the withdrawal date, IORPs registered or authorised in the UK which are active cross-border in the EU 27 should contact the competent authorities of the relevant host EU 27 Member States to determine whether and under which conditions they might be allowed to continue their activities pursuant to national law in this Member State. If the Member State allows continued cross-border activities under its national law, the IORPs would have to decide whether to rely on these rules or to transfer the portfolio.	People and businesses whose pensions / schemes are vested in a UK established IORP should enquire as to the impact on their rights, entitlements and protection before and after the withdrawal date	WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF INSTITUTIONS FOR OCCUPATIONAL RETIREMENT PROVISION
<b>Pensions</b>	Transfer to and EU IORP: If it is not possible to continue the cross-border operations into an EU 27 Member State, UK IORPs may decide to transfer their portfolio related to EU 27 members and beneficiaries to a receiving IORP registered or authorised in EU 27, in order to keep such members and beneficiaries under the EU IORP framework.		WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF INSTITUTIONS FOR OCCUPATIONAL RETIREMENT PROVISION
<b>Pensions</b>	NO Transfer to an EU IORP: If a transfer is not performed, the UK IORP will no longer be able to continue to operate the pension schemes of its EU 27 members and beneficiaries, and the consequences for its EU 27 members and beneficiaries		WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF INSTITUTIONS FOR OCCUPATIONAL RETIREMENT PROVISION

Category	If no agreement is reached:	Consequence	EU Document
Pensions	Sponsoring undertakings established in the EU 27 that pay contributions to an IORP registered or authorised in the United Kingdom should assess the conditions for the continuation of the relevant schemes on the basis of the national law of the Member State in which they are established.		WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF INSTITUTIONS FOR OCCUPATIONAL RETIREMENT PROVISION
Pensions	As of the withdrawal date, such pension schemes will no longer benefit from the legal framework provided by Directive (EU) 2016/2341. If the host Member State does not allow the continued cross-border activities of the UK IORP, sponsoring undertakings will have to make sure that the IORP in question is either transferred or that they find an alternative IORP.		WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF INSTITUTIONS FOR OCCUPATIONAL RETIREMENT PROVISION
Pensions	Sponsoring undertakings established in the United Kingdom that pay contributions to an IORP registered or authorised in the EU 27 with regard to a pension scheme for members or beneficiaries whose relationship with the sponsoring undertaking is governed by EU 27 social and labour law will be able to continue doing so.		WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF INSTITUTIONS FOR OCCUPATIONAL RETIREMENT PROVISION
Pensions	As of the withdrawal date, members and beneficiaries whose relationship with the sponsoring undertaking of an EU 27 IORP is governed by the social and labour law of the United Kingdom relevant to the field of occupational pension schemes ("UK members and beneficiaries") will no longer benefit from the EU legal framework even if the IORP is registered or authorised in the EU 27.		WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF INSTITUTIONS FOR OCCUPATIONAL RETIREMENT PROVISION
Pensions	<b>Contract continuity:</b> The loss of EU registration/authorisation may also affect the ability of IORPs registered or authorised in the United Kingdom to continue performing certain obligations and activities and ensure service continuity with regard to contracts concluded before the withdrawal date.		WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF INSTITUTIONS FOR OCCUPATIONAL RETIREMENT PROVISION

Category	If no agreement is reached:	Consequence	EU Document
Pensions	<b>Before the withdrawal date</b> , IORP members and beneficiaries have to receive, within a reasonable time, any relevant information regarding changes to the pension scheme rules. This includes information on the impact on their rights and the provision of IORP services emerging from the withdrawal of the United Kingdom from the EU, since the withdrawal may trigger changes to their pension scheme rules.		WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF INSTITUTIONS FOR OCCUPATIONAL RETIREMENT PROVISION
Product Approvals Automotive Cars	<b>As of the withdrawal date</b> the framework for the approval of motor vehicles and their trailers and of systems, components and separate technical units intended for such vehicles will no longer apply to the United Kingdom.		WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF TYPE-APPROVAL OF MOTOR VEHICLES
Product Approvals Automotive Cars	<b>CONSEQUENCES FOR THE IDENTIFICATION OF ECONOMIC OPERATORS:</b> Manufacturers established outside the Union must appoint a representative established in the Union to represent them before the Member State type-approval authorities. Manufacturers' representatives established in the United Kingdom will not, as from the withdrawal date, be considered as established in the Union.	Manufacturers established outside the Union, including the UK, are advised to take the necessary steps to ensure that, as from the withdrawal date, their appointed representatives are established in the EU 27.	WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF TYPE-APPROVAL OF MOTOR VEHICLES
Product Approvals Automotive Cars	<b>CONSEQUENCES FOR TYPE-APPROVALS AND TYPE-APPROVAL AUTHORITIES:</b> Motor vehicles within the scope of Directive 2007/46/EC may only be registered, sold and enter into service if they are accompanied by a valid certificate of conformity issued by the manufacturer attesting that the vehicles have been manufactured in conformity with the EU type-approval granted by a Member State authority.		WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF TYPE-APPROVAL OF MOTOR VEHICLES
Product Approvals Automotive Cars	<b>As from the withdrawal date</b> , Directive 2007/46/EC will cease to apply to the United Kingdom. This means that, as from that date, the United Kingdom approval authority will cease to be an EU type-approval authority under Directive 2007/46/EC.		WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF TYPE-APPROVAL OF MOTOR VEHICLES
Product Approvals Automotive Cars	<b>As of the withdrawal date</b> it will not be possible for a manufacturer to place on the Union market motor vehicles accompanied by a certificate of conformity referring to a type-approval granted by the United Kingdom approval authority formerly competent under EU law.		WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF TYPE-APPROVAL OF MOTOR VEHICLES



Category	If no agreement is reached:	Consequence	EU Document
Product Approvals Automotive Cars	<b>As of the withdrawal date</b> the United Kingdom approval authority will no longer be in a position to perform any of the functions and activities of an approval authority for the purposes of Directive 2007/46/EC with respect to type-approvals it granted prior to the withdrawal date.		WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF TYPE-APPROVAL OF MOTOR VEHICLES
Product Approvals Automotive Cars	<b>As of the withdrawal date</b> the United Kingdom approval authority will no longer be able to issue revisions or extensions to previous approvals.		WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF TYPE-APPROVAL OF MOTOR VEHICLES
Product Approvals Automotive Cars	<b>Post Brexit:</b> With respect to vehicle type-approvals granted by the United Kingdom authority prior to the withdrawal date, the Commission is considering the necessary and appropriate steps to ensure and facilitate continued compliance with EU law.		WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF TYPE-APPROVAL OF MOTOR VEHICLES
Product Approvals Industrial	As of the withdrawal date, the EU rules in the field of non-food and non-agricultural products, whether for use by consumers or professionals no longer apply to the United Kingdom. This has, in particular, the consequences presented below for products placed on the EU 27 market as from the withdrawal date.		WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF INDUSTRIAL PRODUCTS
Product Approvals Industrial	<b>CONSEQUENCES FOR THE IDENTIFICATION OF ECONOMIC OPERATORS:</b> <b>As from the withdrawal date,</b> a manufacturer or importer established in the United Kingdom will no longer be considered as an economic operator established in the Union. The importer is the economic operator established in the Union who places a product from a third country on the Union market. These operators will have to comply with the specific obligations relevant to an importer, which are different from those of a distributor.		WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF INDUSTRIAL PRODUCTS
Product Approvals Industrial	<b>As of the withdrawal date</b> Authorised representatives or responsible persons established in the United Kingdom will not, as from the withdrawal date, be recognised as authorised representatives or responsible persons for the purposes of the applicable Union product legislation.	Manufacturers are advised to take the necessary steps to ensure that, as from the withdrawal date, their designated authorised representatives or responsible persons are established in the EU 27.	WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF INDUSTRIAL PRODUCTS



Category	If no agreement is reached:	Consequence	EU Document
Product Approvals Industrial	<p><b>CONSEQUENCES FOR CONFORMITY ASSESSMENT PROCEDURES AND NOTIFIED BODIES:</b> In some product areas, Union legislation requires the intervention of a qualified third party, known as Notified Body, in the conformity assessment procedure. As of the withdrawal date UK Notified Bodies will lose their status as EU Notified Bodies and will be removed from the Commission's information system on notified organisations (NANDO database). As such, UK bodies will not be in a position to perform conformity assessment tasks pursuant to Union product legislation.</p>	<p><i><b>Nando (New Approach Notified and Designated Organisations) Information System).</b></i>  <i>Notification is an act whereby a Member State informs the Commission and the other Member States that a body, which fulfils the relevant requirements, has been designated to carry out conformity assessment according to a directive. Notification of Notified Bodies and their withdrawal are the responsibility of the notifying Member State.</i></p>	WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF INDUSTRIAL PRODUCTS
Product Approvals Industrial	<p><b>As of the withdrawal date</b> When the applicable conformity assessment procedure requires or provides for the possibility of third party intervention, a certificate delivered by a body recognised as an EU Notified Body at the time of the placing of that product on the market will be required for products placed on the market as</p>	Economic operators are advised to take the necessary steps to ensure that, where the applicable conformity assessment procedures require the intervention of a Notified Body, they will hold certificates issued by an EU 27 Notified Body	WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF INDUSTRIAL PRODUCTS
Product Approvals Industrial	<p>Where economic operators hold certificates issued by a UK Notified Body prior to the withdrawal date and plan to continue placing the product concerned on the EU 27 market as from the withdrawal date, they are advised to consider either applying for a new certificate issued by an EU 27 Notified Body or arranging for a transfer – on the basis of a contractual arrangement between the manufacturer, the UK Notified Body, and the EU- 27 Notified Body - of the file and the corresponding certificate from the UK Notified Body to an EU 27 Notified Body, which would then take over the responsibility for that certificate.</p>		WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF INDUSTRIAL PRODUCTS

Category	If no agreement is reached:	Consequence	EU Document
Product Approvals Non Automotive	<b>As of the withdrawal date</b> the approval and market surveillance of agricultural and forestry vehicles, the approval and market surveillance of two- or three-wheel vehicles and quadricycles, and requirements relating to gaseous and particulate pollutant emission limits and type-approval for internal combustion engines for non-road mobile machinery will no longer apply to the United Kingdom.		WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF TYPE-APPROVAL OF CERTAIN VEHICLES AND ENGINES
Product Approvals Non Automotive	<b>As of the withdrawal date</b> manufacturers established outside the Union, including the UK, must appoint a single representative established in the Union to represent them before the Member State type-approval authorities and for the purposes of market surveillance.		WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF TYPE-APPROVAL OF CERTAIN VEHICLES AND ENGINES
Product Approvals Non Automotive	<b>As of the withdrawal date</b> Manufacturers' representatives established in the United Kingdom will not be considered as established in the Union.		WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF TYPE-APPROVAL OF CERTAIN VEHICLES AND ENGINES
Product Approvals Non Automotive	<b>CONSEQUENCES FOR TYPE-APPROVALS AND TYPE-APPROVAL AUTHORITIES:</b> Vehicles within the scope of Regulations (EU) No 167/2013 and (EU) No 168/2013 may only be placed on the market, registered or entered into service if they are accompanied by a valid certificate of conformity issued by the manufacturer attesting that the vehicles have been manufactured in conformity with the EU type-approval granted by a Member State authority.	<i>"approval authority" as "the authority of a Member State established or appointed by the Member State and notified to the Commission by the Member State with competence for all aspects of the approval of a type of vehicle, system, component or separate technical unit, for the authorisation process, for issuing and, if appropriate, withdrawing or refusing approval certificates, for acting as the contact point for the approval authorities of other Member States, for designating the technical services and for ensuring that the manufacturer meets his obligations regarding the conformity of production"</i>	WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF TYPE-APPROVAL OF CERTAIN VEHICLES AND ENGINES

Category	If no agreement is reached:	Consequence	EU Document
Product Approvals Non Automotive	<b>As from the withdrawal date</b> , the Regulations will cease to apply to the United Kingdom. As from that date, the United Kingdom approval authority will cease to be an EU type-approval authority.		WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF TYPE-APPROVAL OF CERTAIN VEHICLES AND ENGINES
Product Approvals Non Automotive	<b>As of the withdrawal date</b> The United Kingdom approval authority will no longer be in a position to perform any of the functions and activities of an approval authority for the purposes of the Regulations with respect to type-approvals it granted prior to the withdrawal date. In addition, the United Kingdom approval authority will no longer be able to issue revisions or extensions to such approvals.		WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF TYPE-APPROVAL OF CERTAIN VEHICLES AND ENGINES
Professional Qualifications	The withdrawal of the United Kingdom does not affect decisions on the recognition of professional qualifications obtained in the United Kingdom taken before the withdrawal date	Recognition by the UK of pre withdrawal professional qualifications are likely to continue	WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF REGULATED PROFESSIONS AND THE RECOGNITION OF PROFESSIONAL QUALIFICATIONS
Professional Qualifications	After withdrawal The recognition of professional qualifications of United Kingdom nationals in an EU 27 Member State will be governed by the national policies and rules of that Member State, irrespective of whether the qualifications of the United Kingdom national were obtained in the United Kingdom, in another third country or in an EU 27 Member State.	<b>The UK may introduce new recognition criteria or processes. This could impact new registrations for recognition.</b>	WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF REGULATED PROFESSIONS AND THE RECOGNITION OF PROFESSIONAL QUALIFICATIONS

Category	If no agreement is reached:	Consequence	EU Document
Professional Qualifications	The temporary or occasional provision of services by United Kingdom nationals in an EU 27 Member State, even if they are already legally established in an EU 27 Member State will be governed by the national policies and rules of that Member State.	<b>The temporary or occasional provision of services by Irish nationals in the UK will now be governed by UK policies and rules</b>	WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF REGULATED PROFESSIONS AND THE RECOGNITION OF PROFESSIONAL QUALIFICATIONS
Professional Qualifications	Concerning EU 27 nationals, qualifications obtained in the United Kingdom (hereafter "UK professional qualifications") as of the withdrawal date are third country qualifications for the purpose of EU law.	<b>Irish citizens qualifying professionally in the UK after withdrawal will be treated as Third Country Certified by the EU and in Ireland. Recognition of the UK gained qualifications will be governed by the national policies and rules of each of the EU 27 Member States. (Recognition needed in each of the 27 countries separately)</b>	WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF REGULATED PROFESSIONS AND THE RECOGNITION OF PROFESSIONAL QUALIFICATIONS
Professional Qualifications	EU 27 nationals holding UK professional qualifications obtained before the withdrawal date should consult the relevant national authorities to assess whether it is advisable to obtain, before the withdrawal date, the recognition of those UK professional qualifications in an EU 27 Member State.	<b>Irish holders of UK Professional qualifications should check if these need to be recognised before the withdrawal date.</b>	WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF REGULATED PROFESSIONS AND THE RECOGNITION OF PROFESSIONAL QUALIFICATIONS
Professional Qualifications Seafarers	As of the withdrawal date, recognition by an EU 27 Member State of certificates issued to seafarers by the United Kingdom will be subject to the conditions set out in Article 19 of Directive 2008/106/EC6, in line with the new status of the United Kingdom as a third country.		WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES ON THE MINIMUM LEVEL OF TRAINING OF SEAFARERS AND THE MUTUAL RECOGNITION OF SEAFARERS' CERTIFICATES

Category	If no agreement is reached:	Consequence	EU Document
Professional Qualifications Seafarers	Seafarers serving on board a vessel flying the flag of an EU Member State have to hold the requisite certificate of competency or certificate of proficiency issued by that Member State, by another EU Member State or by one of the EU approved third countries. The Member State of the vessel recognises the certificates issued to seafarers by the other Member States or the recognised third countries, for such certificates to be valid in that Member State. As of the withdrawal date, the certificates issued to seafarers by the United Kingdom can no longer be presented for an 'endorsement attesting recognition' by an EU 27 Member State.	Irish seafarers who hold a UK certificate (competency / Proficiency) will need to be recertified in an EU 27 country.	WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES ON THE MINIMUM LEVEL OF TRAINING OF SEAFARERS AND THE MUTUAL RECOGNITION OF SEAFARERS' CERTIFICATES
Professional Qualifications Seafarers	Existing Certificates: The 'endorsement[s] attesting recognition' issued prior to the withdrawal date by EU 27 Member States under Directive 2005/45/EC of certificates issued to seafarers by the United Kingdom will continue to be valid until their expiry.	Irish seafarers who hold a UK certificate (competency / Proficiency) will need to be recertified in an EU 27 country.	WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES ON THE MINIMUM LEVEL OF TRAINING OF SEAFARERS AND THE MUTUAL RECOGNITION OF SEAFARERS' CERTIFICATES
Professional Qualifications Seafarers	A master or an officer holding an 'endorsement attesting recognition' issued by a Member State will be able to continue working on board vessels flying the flag of that Member State. <b>Restrictions: As of the withdrawal date</b> they will not be able to change and work on board a vessel flying the flag of another Member State on the basis of their existing UK-issued certificates, given that the basis for the recognition of their certificates by that Member State would no longer be applicable.	Irish seafarers who hold a UK certificate (competency / Proficiency) cannot change their vessel of employment after the withdrawal date.	WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES ON THE MINIMUM LEVEL OF TRAINING OF SEAFARERS AND THE MUTUAL RECOGNITION OF SEAFARERS' CERTIFICATES
Professional Qualifications Boat masters	<b>As of the withdrawal date</b> , boat masters' certificates issued by the UK in conformity with Directive 96/50 will no longer be valid for any waterway within the Union.		WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF INLAND WATERWAYS
Professional Qualifications Councils	<b>As of the withdrawal date</b> , for the purpose of determining whether there is a Community scale undertaking or a Community-scale group of undertakings to which Directive 2009/38/EC applies, the United Kingdom will no longer be counted as a Member State and employees in the United Kingdom will no longer count as employees within the Member States.		WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF INFORMATION AND CONSULTATION OF WORKERS AT TRANSNATIONAL LEVEL

Category	If no agreement is reached:	Consequence	EU Document
Professional Qualifications Train Drivers	TRAIN DRIVER CERTIFICATION: As of the withdrawal date, licenses and certificates for train drivers issued in the United Kingdom will no longer be valid in the EU 27.		WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF RAIL TRANSPORT
Public Procurement	<b>As of the withdrawal date</b> the EU rules in the field of public procurement no longer apply to the United Kingdom		WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF PUBLIC PROCUREMENT
Public Procurement	<b>As of the withdrawal date</b> Economic operators from the United Kingdom will have the same status as all other economic operators based in a third country with which the EU does not have any agreement providing for the opening of the EU procurement market. They shall therefore be subject to the same rules as any third country tenderer.		WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF PUBLIC PROCUREMENT
Public Procurement	<b>As of the withdrawal date</b> tenders in this type of EU procurements offering more than 50% of products originating from the United Kingdom and other third countries may be rejected or may not be awarded a contract.	<i>Procurement procedures for the purchase of supplies by entities operating in the water, energy, transport and postal services sectors, sets forth that tenders submitted in the EU may be rejected if the proportion of the products originating in third countries with which the EU has not concluded an agreement ensuring comparable and effective access for EU undertakings to the markets of those third countries, exceeds 50%.</i>	WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF PUBLIC PROCUREMENT
Public Procurement	<b>As of the withdrawal date</b> Economic operators from the United Kingdom may therefore be excluded from bidding for defence and security contracts in the EU.		WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF PUBLIC PROCUREMENT

Category	If no agreement is reached:	Consequence	EU Document
Public Procurement	<b>As of the withdrawal date</b> , the United Kingdom ceases to be a member of the Union, EU Member States will no longer be under the obligation to recognise security clearances obtained by an economic operator in the United Kingdom, even where they could consider them as equivalent to their national security clearances.	<i>This may lead to the exclusion of operators relying on a United Kingdom security clearance in EU defence and security public procurement procedures.</i>	WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF PUBLIC PROCUREMENT
Ship Recycling	As of the withdrawal date the EU rules on ship recycling on ship recycling <sup>4</sup> no longer apply to the United Kingdom.	<b>Irish vessels to be recycled must find an alternative recycling facility approved by the EU.</b>	WITHDRAWAL OF THE UNITED KINGDOM AND THE EU SHIP RECYCLING REGULATION
Ship Recycling	Owners of ships flying the flag of a Member State shall ensure that ships destined to be recycled are only recycled at ship recycling facilities that are included in the European List of ship recycling facilities ('the European List').	<b>Irish registered vessels cannot be recycled in UK facilities</b>	WITHDRAWAL OF THE UNITED KINGDOM AND THE EU SHIP RECYCLING REGULATION
Ship Recycling	As of the withdrawal date, the entries in the European List of ship recycling facilities for facilities located in the United Kingdom will become void. Ships flying the flag of a Member State of the Union may no longer be recycled at these ship recycling facilities.	<b>This applies to all Irish registered vessels including trawlers and other transport / leisure vessels.</b>	WITHDRAWAL OF THE UNITED KINGDOM AND THE EU SHIP RECYCLING REGULATION
Trade Industrial security	<b>FACILITY SECURITY CLEARANCE (FSC):</b> As of the withdrawal date, facility security clearances issued by the United Kingdom NSA, DSA or other competent security authority are no longer valid for the purposes of Commission Decision (EU, Euratom) 2015/444. This could, under the terms of the classified contract/grant agreement that was signed, constitute a ground for termination, unless the contractor/beneficiary has taken appropriate remedial measures,		WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF INDUSTRIAL SECURITY
Trade Industrial security	<b>Withdrawal date ongoing procedures Tenders and Applications:</b> Where an award procedure is ongoing on the withdrawal date, tenderers or applicants that cannot comply with their security obligations will be rejected.	Where applications or tenders for EU funded work include applicants who are not security certified the bids will be automatically rejected as invalid.	WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF INDUSTRIAL SECURITY



Category	If no agreement is reached:	Consequence	EU Document
Trade Industrial security	<p><b>PERSONNEL SECURITY CLEARANCE (PSC):</b> EU classified contracts or classified grant agreements shall include provisions indicating that staff of a contractor, subcontractor or beneficiary who, for the performance of the classified contract, subcontract or grant agreement, require access to EU classified information, shall be security cleared at the relevant level by the NSA, DSA or any other competent authority of the Member State in which the contractor, subcontractor, or beneficiary is registered. <b>As of the withdrawal date</b>, the personnel security clearances issued by the United Kingdom NSA, DSA or other competent security authority are no longer valid for the purposes of Commission Decision (EU, Euratom) 2015/444. This could, under the terms of the classified contract/grant agreement that was signed, constitute a ground for termination, unless the contractor/ beneficiary has taken appropriate remedial measures.</p>	<p>Irish citizens with a PSC issued in the UK will have to apply for a PSC in one of the EU 27 countries.</p>	<p>WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF INDUSTRIAL SECURITY</p>
Trade Industrial security	<p><b>SUBCONTRACTS:</b> No subcontract involving access to EU classified information may be awarded to subcontractors registered in a third country, unless there is a particular regulatory framework for the security of information. Non-compliance with this obligation could, under the terms of the classified contract/grant agreement that was signed, constitute a ground for termination, unless the contractor/beneficiary has taken appropriate remedial measures (such as ensuring that the subcontract is changed to a subcontractor with security clearance issued by an EU 27 Member State or third country with a security agreement).</p>	<p>UK subcontractors will not be allowed access to EU classified information unless there is a third country agreement between the UK and the EU.</p>	<p>WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF INDUSTRIAL SECURITY</p>
Trade Industrial security	<p><b>Withdrawal date ongoing procedures Subcontracts:</b> Where an award procedure is ongoing on the withdrawal date, tenderers or applicants with subcontracts that do not comply with the security requirements will be rejected.</p>	<p>Where applications or tenders for EU funded work include subcontractors who are not security certified the bids will be automatically rejected as invalid.</p>	<p>WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF INDUSTRIAL SECURITY</p>



Category	If no agreement is reached:	Consequence	EU Document
Trade Customs	<b>As of the withdrawal date</b> , the EU preferential trade arrangements with third countries in the field of the common commercial policy and customs no longer apply to the United Kingdom.	<b>As of the withdrawal date UK products, goods, components, ingredients etc. are no longer considered of EU origin for preferential trade situations (import and export).</b>	WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF CUSTOMS AND EXTERNAL TRADE
Trade Customs	<b>Goods exported from the EU:</b> These may benefit from preferential tariff treatment in an EU FTA partner country when they have EU preferential origin. As of the withdrawal date, an EU FTA partner country may consider that goods having an EU preferential origin before the withdrawal date no longer qualify at the moment of their importation in that third country, due to United Kingdom inputs not being considered as 'EU content'. As of the withdrawal date, in case of verification of the origin of goods exported to a third country under preferential treatment, the exporters in the EU 27 may, upon request from that third country, have to prove the EU origin of the goods taking into account that United Kingdom inputs no longer account as 'EU content'.	<b>Irish goods or products with UK sourced or produced content or ingredients that have not left the EU for their destination by the withdrawal date will have to provide additional proof of origin for the UK content which is no longer covered by preferential origin agreements.</b>	WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF CUSTOMS AND EXTERNAL TRADE
Trade Customs	<b>Goods imported into the EU from third countries</b> with which the EU has preferential trade arrangements receive preferential tariff treatment if they comply with preferential rules of origin. The origin of the goods is certified either by governmental authorities ('certificates of origin') or by the exporters themselves (subject to prior authorisation or registration), through 'declarations' or 'statements' on origin made out on commercial documents. The origin of goods may be subject to verification by the exporting party, upon request from the importing party. To provide evidence of compliance with origin requirements, the exporter obtains from its suppliers supporting documentation (such as 'supplier's declarations') that allow for the traceability within the EU of the production processes and supplies of materials until the export of the final product. <b>As of the withdrawal date</b> United Kingdom inputs incorporated in goods obtained in third countries with which the EU has preferential trade arrangements and imported into the EU will be 'non-originating', in particular in a context of cumulation of origin with the	<b>Non EU Goods or products with UK sourced or produced content or ingredients that have not left for the EU by the withdrawal date will have to provide additional proof of origin for the UK content which is no longer covered by preferential origin agreements.</b>	WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF CUSTOMS AND EXTERNAL TRADE

Category	If no agreement is reached:	Consequence	EU Document
	EU. As of the withdrawal date, in case of verification of the origin of goods imported into the EU, exporters in third countries may have to prove the EU preferential origin of the imported goods. As of the withdrawal date EU 27 importers are advised to ensure that the exporter is able to prove the EU preferential origin of the imported goods, taking account of the consequences of the withdrawal of the United Kingdom.		
Trade Customs	<b>As of the withdrawal date</b> , the EU rules in the field of customs and indirect taxation (VAT and excise duties) no longer apply to the United Kingdom.	EU VAT laws as applied to third countries will apply to imports or exports involving the UK.	WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF CUSTOMS AND INDIRECT TAXATION
Trade Customs	<b>Customs Formalities: As of the withdrawal date</b> , Goods which are brought into the customs territory of the EU from the United Kingdom or are to be taken out of that territory for transport to the United Kingdom, are subject to customs supervision and may be subject to customs controls. This implies that customs formalities apply, declarations have to be lodged and customs authorities may require guarantees for potential or existing customs debts.	Imports and exports involving the UK will have new customs processes to be completed before goods can enter or leave the EU. This includes VAT payments and provisions for duties.	WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF CUSTOMS AND INDIRECT TAXATION
Trade Customs	<b>Customs Duties:</b> As of the withdrawal date, Goods which are brought into the customs territory of the EU from the United Kingdom are subject to the application of the relevant customs duties.	Duties must be paid before the goods are permitted to enter the EU market	WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF CUSTOMS AND INDIRECT TAXATION
Trade Customs	<b>Restricted goods: As of the withdrawal date</b> , Certain goods which enter the EU from the United Kingdom or are leaving the EU to the United Kingdom are subject to prohibitions or restrictions on grounds of public policy or public security, the protection of health and life of humans, animals or plants, or the protection of national treasures	Such goods will have to conform to EU legislation and entry / exit requirements	WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF CUSTOMS AND INDIRECT TAXATION

Category	If no agreement is reached:	Consequence	EU Document
Trade Customs	<b>Authorisation: As of the withdrawal date</b> , Authorisations granting the status of Authorised Economic Operator (AEO) and other authorisations for customs simplifications, issued by the customs authorities of the United Kingdom will no longer be valid in the customs territory of the Union.	Irish people or businesses who hold UK authorisations as an Authorised Economic Operator (AEO) and other authorisations for customs simplifications will need to be re Authorised in an EU 27 member state	WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF CUSTOMS AND INDIRECT TAXATION
Trade Customs	<b>UK Contents of Goods: As of the withdrawal date</b> , Goods originating in the United Kingdom that are incorporated in goods exported from the EU to third countries will no longer qualify as "EU content" for the purpose of the EU's Common Commercial Policy.	<b>This affects the ability of EU exporters to cumulate with goods originating in the United Kingdom and may affect the applicability of preferential tariffs agreed by the Union with third countries.</b>	WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF CUSTOMS AND INDIRECT TAXATION
Trade Customs	<b>Submission of Union applications:</b> An applicant can submit to the competent customs department a Union application requesting the customs authorities of that Member State and of one or more other Member States to take action with respect to goods suspected of infringing an intellectual property right. <b>As of the withdrawal date</b> , Union applications can no longer be submitted to the competent customs department of the United Kingdom		WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF CUSTOMS ENFORCEMENT OF INTELLECTUAL PROPERTY RIGHTS
Trade Customs	Decisions concerning granted Union applications: As of the withdrawal date, decisions granting Union applications adopted by the competent customs department of the United Kingdom as a Member State on the basis of Union law are no longer valid in the EU 27.		WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF CUSTOMS ENFORCEMENT OF INTELLECTUAL PROPERTY RIGHTS

Category	If no agreement is reached:	Consequence	EU Document
Trade Energy Market	<p><b>COMPENSATION BETWEEN TRANSMISSION SYSTEM OPERATORS (TSOS):</b> EU TSOs receive compensation for hosting cross-border flows of electricity on their networks. This compensation replaces explicit charges for the use of interconnectors. For Third country (e.g. the UK after the withdrawal date) imports and exports of electricity, EU law provides that a transmission system use fee is to be paid on all scheduled imports and exports of electricity from all third countries which have not adopted an agreement whereby it is applying Union law. <b>As of the withdrawal date</b> this provision will apply to imports of electricity from and exports of electricity to the United Kingdom.</p>		WITHDRAWAL OF THE UNITED KINGDOM AND THE INTERNAL ENERGY MARKET
Trade Energy Market	<p><b>INTERCONNECTIVITY:</b> EU gas and electricity market legislation sets out rules on the allocation of interconnection capacity and provides for mechanisms to facilitate their implementation. <b>As of the withdrawal date,</b> United Kingdom based operators will cease to participate in the single allocation platform for forward interconnection capacity, the European balancing platforms and the single day-ahead and intraday coupling. United Kingdom based NEMOs will become third country operators and will no longer be entitled to carry out market coupling services in the EU.</p>		WITHDRAWAL OF THE UNITED KINGDOM AND THE INTERNAL ENERGY MARKET
Trade Energy Market	<p><b>ELECTRICITY AND GAS TRADING:</b> EU based market participants must register with their national energy regulatory authority. Market participants from third countries are required to register with the national energy regulatory authority of a Member State where they are active. <b>As of the withdrawal date,</b> market participants based in the United Kingdom will become third country participants. <b>As of the withdrawal date, participants</b> based in the United Kingdom who wish to continue trading EU wholesale energy products will need to register with each national energy regulatory authority of a Member State where they are active.</p>		WITHDRAWAL OF THE UNITED KINGDOM AND THE INTERNAL ENERGY MARKET

Category	If no agreement is reached:	Consequence	EU Document
Trade Energy Market	<b>Applications and Enforcement:</b> The registration form has to be submitted prior to entering into a transaction which is required to be reported. The national regulatory authority registering market participants from the United Kingdom is responsible for ensuring that the enforcement provisions		WITHDRAWAL OF THE UNITED KINGDOM AND THE INTERNAL ENERGY MARKET
Trade Energy Market	<b>INVESTMENTS IN TRANSMISSION SYSTEM OPERATORS:</b> On the date of withdrawal TSOs controlled by investors from the United Kingdom are TSOs controlled by persons from a third country. For these TSOs to continue their activity in the EU, they require a new EU certification. Member States may refuse certification where granting certification poses a threat to security of supply of the Member State.		WITHDRAWAL OF THE UNITED KINGDOM AND THE INTERNAL ENERGY MARKET
Trade Energy Market	<b>CONDITIONS FOR GRANTING AND USING AUTHORISATIONS FOR THE PROSPECTION, EXPLORATION AND PRODUCTION OF HYDROCARBONS:</b> <b>As of the withdrawal date</b> According to the second sub-paragraph of Article 2(2) of Directive (EU) 94/22/EC, Member States may refuse on grounds of national security to allow access to and exercise of these activities to any UK entity as they will then be defined as being effectively controlled by third countries / third country nationals.		WITHDRAWAL OF THE UNITED KINGDOM AND THE INTERNAL ENERGY MARKET
Trade Energy Origin	<b>GUARANTEES OF ORIGIN:</b> Member States must ensure that a guarantee of origin is issued in response to a request from a producer of electricity from renewable energy sources. The guarantees of origin are issued for the purposes of proving to the final customers the share or quantity of energy from renewable energy sources in an energy supplier's energy mix. As of the withdrawal date Guarantees of origin that have been issued by designated bodies in the United Kingdom will no longer be recognised by the EU 27 Member States.		WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF GUARANTEES OF ORIGIN OF ELECTRICITY FROM RENEWABLE ENERGY SOURCES

Category	If no agreement is reached:	Consequence	EU Document
Trade Energy Origin	CERTIFICATION OF INSTALLERS: Member States shall ensure that certification schemes or equivalent qualification schemes are available for installers of small-scale biomass boilers and stoves, solar photovoltaic and solar thermal systems, shallow geothermal systems and heat pumps. As of the withdrawal date Certifications of installers awarded by the United Kingdom will no longer be recognised by the EU 27 Member States.	<b>UK certified installers will not be able to operate in any of the EU 27 member states. Irish based installers with UK certifications will have to recertify in one of the EU 27 member states.</b>	WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF GUARANTEES OF ORIGIN OF ELECTRICITY FROM RENEWABLE ENERGY SOURCES
Trade Import and Export licences	IMPORT/EXPORT LICENCES REQUIRED UNDER UNION LAW: Different areas of Union law provide, for certain goods, a mandatory authorisation/approval/notification of shipments from a third country to the European Union or vice versa ("import/export licences"). As of the withdrawal date, where the import/export of goods is subject to a licensing requirement under Union law, shipments from the EU 27 to the United Kingdom and vice versa will require such an import/export licence.	<b>UK Imports and exports to and from the EU 27 will required import / export licences for certain types of goods as defined by the EU.</b>	WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF IMPORT/EXPORT LICENCES FOR CERTAIN GOODS
Trade Import and Export licences	IMPORT/EXPORT LICENCES ISSUED BY THE UNITED KINGDOM AS AN EU MEMBER STATE ON THE BASIS OF UNION LAW: As of the withdrawal date, import/export licences issued by the United Kingdom as an EU Member State on the basis of Union law are no long valid for shipments to the EU 27 from third countries or vice versa.	<b>UK import and export licences issued before the Withdrawal date will no longer be valid for the import / export of goods into the EU 27.</b>	WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF IMPORT/EXPORT LICENCES FOR CERTAIN GOODS
Trade Import and Export licences	<b>Import and Export Licences: Goods Covered.</b> Import/export licences exist in a wide range of policy areas and for a wide variety of goods, including the following: Waste; Certain hazardous chemicals; Ozone-depleting substances; Mercury and certain mixtures of mercury; Drug precursors; Genetically-modified organisms; Specimens of endangered species; Cultural goods; Rough diamonds; Dual use goods; Firearms and ammunition; Military technology and equipment; Certain goods which could be used for capital punishments/torture.	<b>The cultural goods aspect of this may impact arts and crafts etc.</b>	WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF IMPORT/EXPORT LICENCES FOR CERTAIN GOODS

Category	If no agreement is reached:	Consequence	EU Document
Trade Intellectual Property	As of the withdrawal date, the EU rules on customs enforcement of intellectual property rights no longer apply to the United Kingdom.	EU rights and enforcement of intellectual property rights will be replaced by those in the UK.	WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF CUSTOMS ENFORCEMENT OF INTELLECTUAL PROPERTY RIGHTS
Trade Intellectual Property	Post withdrawal treatment of active Submission of Union applications: Union applications submitted in one of the EU 27 Member States remain valid in the EU 27 as of the withdrawal date even if the customs authorities of the United Kingdom are amongst the customs authorities requested to take action. Where a Union application was submitted in a Member State other than the United Kingdom, only requesting the customs authorities of that Member States and the customs authorities of the United Kingdom to take action, that application remains valid as a national application for the Member State in which it was submitted.		WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF CUSTOMS ENFORCEMENT OF INTELLECTUAL PROPERTY RIGHTS
Trade Intellectual Property	Post withdrawal treatment of active Decisions concerning granted Union applications: Decisions granting Union applications adopted in one of the EU 27 Member States remain valid in the EU 27 as of the withdrawal date even if the customs authorities of the United Kingdom are amongst the customs authorities required to take action. Where a Member State other than the United Kingdom adopted a decision granting a Union application, requiring only the customs authorities of that Member State and the customs authorities of the United Kingdom to take action, that decision remains valid for the Member State in which it was submitted.		WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF CUSTOMS ENFORCEMENT OF INTELLECTUAL PROPERTY RIGHTS
Trade Customs Backstop	As of the withdrawal date, unless another solution is found, the backstop agreement allows for: An Open border between Ireland and Northern Ireland, Access of Northern Ireland to Single Market for goods, EU tariffs and rules of origin apply to non-EU goods (e.g. UK made goods), EU VAT and excise rules apply, EU product safety and quality standards (e.g. food, chemicals and consumer goods) apply, EU rules on animal health and welfare apply.	<b>Under the back stop agreement customs clearance would take place at points of entry to Ireland or Northern Ireland <i>BUT NOT</i> at the Northern Ireland / republic border.</b>	THE EU'S 'BACKSTOP' PROPOSAL



Category	If no agreement is reached:	Consequence	EU Document
Trade Euratom	<b>As of the withdrawal date</b> , the overall set of Euratom provisions (i.e. the Euratom acquis) no longer applies to the United Kingdom		WITHDRAWAL OF THE UNITED KINGDOM AND THE EURATOM ACQUIS
Trade Euratom	<b>COMMON SUPPLY POLICY: As from the withdrawal date</b> , ESA and, where relevant, the Commission, will have to take account of the fact that materials transferred to the United Kingdom will no longer contribute to the Community's security of supply and reach an assessment of the United Kingdom's safeguards regime before its co-signature and, where relevant, authorisation can be given in relation to the aforementioned contracts.		WITHDRAWAL OF THE UNITED KINGDOM AND THE EURATOM ACQUIS
Trade Euratom Exports	<b>EXPORTS:</b> As from the withdrawal date, the requirement below will apply to exports from the EU 27 to the United Kingdom. Authorisation to dispose production outside the Community: In accordance with Article 59 of the Euratom Treaty, the "conclusion" (co-signature by ESA) of contracts pertaining to the export of EU-produced nuclear materials towards a third country needs to be authorised by the Commission. Such authorisation may not be granted if the recipients of the supplies fail to satisfy the requirement that the general interests of the Community are safeguarded or in the event the terms and conditions of the contracts in question are contrary to the Euratom Treaty.		WITHDRAWAL OF THE UNITED KINGDOM AND THE EURATOM ACQUIS
Trade Euratom Exports	<b>Exports: Consent of third parties and other special procedures: As of the withdrawal date</b> , the United Kingdom will be neither part of the common nuclear market, nor will it be covered by these agreements. As a consequence, exports and imports of nuclear items, to and from the United Kingdom, may require a special procedure and/or the prior consent of the Third Country concerned.	<i>Euratom has concluded several Nuclear Cooperation Agreements with third countries. Currently, under these agreements nuclear items (including nuclear materials, equipment and other items usually foreseen in such agreements) can be transferred within the nuclear common market on the territory of the Euratom Community (including to and from UK) without being submitted to a special procedure and/or the prior consent of the Third Country concerned.</i>	WITHDRAWAL OF THE UNITED KINGDOM AND THE EURATOM ACQUIS



Category	If no agreement is reached:	Consequence	EU Document
<b>Trade Euratom free movement</b>	As of the withdrawal date, the freedoms guaranteed under the Euratom Treaty, including the free movement of goods and products <sup>15</sup> , of skilled staff, or of natural or legal persons wishing to participate in the construction of nuclear installations, will cease to apply in the relations between the United Kingdom and the EU 27.		WITHDRAWAL OF THE UNITED KINGDOM AND THE EURATOM ACQUIS
<b>Trade Euratom safety</b>	<b>BASIC SAFETY STANDARDS DIRECTIVE: As of the withdrawal date,</b> specific requirements will apply on undertakings intending to import from the UK a consumer product; Article 21 lists products for which import and export are prohibited. In addition, the import of consumer products from third countries is subject to regulatory control and requires notification and licensing (Articles 25 and 28). Article 75 of Council Directive 2013/59/Euratom contains specific provisions on building materials which need to be complied with before such materials can be placed on the market in the Community. Article 93 of Council Directive 2013/59/Euratom obliges Member States to encourage the establishment of systems to detect the presence of radioactive contamination in metal products imported from third countries. Sellafield		WITHDRAWAL OF THE UNITED KINGDOM AND THE EURATOM ACQUIS
<b>Trade Euratom Supply</b>	<b>COMMON SUPPLY POLICY: As from the withdrawal date,</b> the United Kingdom will cease to participate in the common supply policy. Consequently, as from the withdrawal date, the co-signature by ESA of contracts pertaining to the supply of nuclear materials (and, where applicable, the Commission authorisation for such contracts) in connection with the United Kingdom, will cease to have effect.		WITHDRAWAL OF THE UNITED KINGDOM AND THE EURATOM ACQUIS

Category	If no agreement is reached:	Consequence	EU Document
<b>Trade Euratom waste</b>	RADIOACTIVE WASTE DIRECTIVE: Council Directive 2011/70/Euratom establishing a Community framework for the responsible and safe management of spent fuel and radioactive waste sets rules for shipments of radioactive waste from a Member State to a third country with the aim of disposal. As of the withdrawal date, these rules apply for shipments from the EU 27 to the United Kingdom. According to Article 4(4), second subparagraph of Council Directive 2011/70/Euratom these rules include: an obligation to inform the Commission prior to shipment to a third country; the obligation that the Member States in question needs to have in place an agreement with the third country to use a disposal facility; the requirement that the disposal facility needs to be authorised and operating. Sellafield		WITHDRAWAL OF THE UNITED KINGDOM AND THE EURATOM ACQUIS
<b>Trade Euratom safety</b>	<b>BASIC SAFETY STANDARDS DIRECTIVE: As of the withdrawal date</b> , any import of radioactive material from the United Kingdom to the Community and any export of radioactive material from the Community to the United Kingdom will need to comply with the requirements in Council Directive 2013/59/Euratom – the Euratom Basic Safety Standards Directive – applies, inter alia, to the import to and export from the Community of radioactive material (see Article 2(2) an of Council Directive 2013/59/Euratom).		WITHDRAWAL OF THE UNITED KINGDOM AND THE EURATOM ACQUIS
<b>Trade protected species</b>	As of the withdrawal date, Council Regulation (EC) No 338/97 of 9 December 1996 on the protection of species of wild fauna and flora by regulating trade therein no longer applies to the United Kingdom.		WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES ON TRADE IN PROTECTED SPECIES OF WILD FAUNA AND FLORA
<b>Trade protected species</b>	As of the withdrawal date, Articles 4 and 5 of Council Regulation 338/97 apply to the introduction and (re-) export of specimens of protected species between the United Kingdom and the EU 27. For the cross-border movement of protected species for non-commercial purposes specific derogations to these rules are in place, especially for personal and household effects and scientific institutions, pursuant to Article 7(3) and 7(4) of Council Regulation 338/97.		WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES ON TRADE IN PROTECTED SPECIES OF WILD FAUNA AND FLORA

Category	If no agreement is reached:	Consequence	EU Document
Trade protected species Export	<b>Export or Re export: As of the withdrawal date</b> the export or re-export from the EU to a third country <b>(including the United Kingdom)</b> of specimens of protected species are subject to the prior presentation, at the customs office at which the export formalities are completed, of an export permit or re-export certificate issued by a management authority of the EU Member State in which the specimens are located. Article 5 of Council Regulation 338/97		WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES ON TRADE IN PROTECTED SPECIES OF WILD FAUNA AND FLORA
Trade protected species Import	<b>Imports to EU: As of the withdrawal date</b> , the introduction into the EU of UK origin or transit specimens of species included in Annexes A and B is subject to the prior presentation, at the customs office of entry, of an import permit issued by a management authority of the Member State of destination. Article 4 of Council Regulation 338/97		WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES ON TRADE IN PROTECTED SPECIES OF WILD FAUNA AND FLORA
Transport Air	<b>Air carriers holding EU operating licences:</b> To obtain and keep an EU operating licence and benefit from the intra-EU air traffic rights, air carriers must comply at all times with EU conditions. An air carrier must have its principal place of business within an EU Member State, and to be majority owned and effectively controlled by EU Member States and/or nationals of EU Member States. <b>If the conditions are no longer fulfilled as a consequence of the United Kingdom becoming a third country, the operating licence at issue will no longer be valid.</b>	Some UK air operators may not be able to operate into and out of the EU 27 member states	WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF AIR TRANSPORT
Transport Air	<b>Air carriers holding an operating licence delivered by the UK authorities:</b> As of the withdrawal date, the operating licences granted to airlines by the United Kingdom Civil Aviation Authority will no longer be valid EU operating licences.	UK air carriers will require an operating licence from each of the EU 27 member states	WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF AIR TRANSPORT
Transport Air	As of the withdrawal date, the United Kingdom will automatically cease to be covered by air transport agreements of the Union, whether these have been entered into by the Union alone (e.g. the Air Transport Agreement with Switzerland) or by the Union and its Member States acting jointly (e.g. the Air Transport Agreement with the USA).	UK will have to negotiate bi lateral rights with countries that the UK relies on EU rights to operate into and out of.	WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF AIR TRANSPORT

Category	If no agreement is reached:	Consequence	EU Document
Transport Air	<p><b>Air carriers of the United Kingdom:</b> Air carriers of the United Kingdom will no longer enjoy traffic rights under any air transport agreement to which the Union is a party, be it to or from the territory of the United Kingdom, be it to or from the territory of any of the EU Member States. Air carriers of the United Kingdom will no longer have access to designation/traffic rights so far available under the bilateral air transport agreements between EU Member States and a third country on account of the principle of EU designation accepted by the third country concerned.</p>	<p>UK will have to negotiate bilateral rights with countries that the UK relies on EU rights to operate into and out of.</p>	<p>WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF AIR TRANSPORT</p>
Transport Air	<p><b>Air carriers of any of the EU Member States:</b> Air carriers of the EU Member States will no longer enjoy traffic rights to or from the territory of the United Kingdom granted to Union carriers by a third country under any air transport agreement to which the Union is a party. Rights under the said agreements as regards, inter alia, cooperative market arrangements including leasing, intermodal service or operational flexibility may be affected if, and to the extent to which, they are exercised in the territory of the United Kingdom or in connection with carriers of the United Kingdom. Air carriers of the EU Member States may no longer have access to designation / traffic rights so far available under the bilateral air transport agreements between the United Kingdom and a third country on account of the principle of EU designation accepted by the third country concerned.</p>	<p>Where the UK has bilateral air carrier rights with a third country EU air carriers will not have the right to operate under those UK bilateral agreements.</p>	<p>WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF AIR TRANSPORT</p>
Transport Air	<p><b>Air carriers of countries which are not Member States of the EU:</b> Air carriers of countries which are not Member States of the EU will no longer benefit from access to traffic rights to or from the territory of the United Kingdom, or any other rights where these have been granted to their country under any air transport agreement to which the Union is a party.</p>	<p>Non EU air carriers will lose their UK traffic rights as of the withdrawal date. New UK bilateral agreements will be necessary to continue to serve the UK Market</p>	<p>WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF AIR TRANSPORT</p>
Transport Air Safety	<p><b>Air safety:</b> After the withdrawal date the UK will cease to participate in the activities of EASA and consequently the UK Civil Aviation Authority will no longer need to ensure compliance by UK-based companies with the EU aviation safety legislation.</p>	<p>UK air safety laws will apply. These may differ and not comply with EU ones.</p>	<p>WITHDRAWAL OF THE UNITED KINGDOM AND EU AVIATION SAFETY RULES</p>

Category	If no agreement is reached:	Consequence	EU Document
Transport Air Safety	<b>CERTIFICATES ISSUED BY THE EUROPEAN AVIATION SAFETY AGENCY TO HOLDERS LOCATED IN THE UNITED KINGDOM: type Certificates for products, certificates for parts and appliances, and certificates for design organisations.</b> As of the withdrawal date certificates issued by EASA to persons and organisations located in the United Kingdom will no longer be valid in the EU. The products, parts and appliances concerned will no longer be considered as certified	products, parts and appliances concerned will no longer be considered as certified if they only hold a UK certificate. Recertification in an EU 27-member state is required for them to enter the EU market or air fleet.	WITHDRAWAL OF THE UNITED KINGDOM AND EU AVIATION SAFETY RULES
Transport Air Safety	<b>CERTIFICATES ISSUED BY THE COMPETENT AUTHORITIES OF THE UNITED KINGDOM:</b> Certificates issued <b>before</b> the withdrawal date by the competent authorities of the United Kingdom will no longer be valid in the EU.	All certificates issued before the withdrawal date will be invalid and recertification in an EU 27 member state is required.	WITHDRAWAL OF THE UNITED KINGDOM AND EU AVIATION SAFETY RULES
Transport Air Safety	<b>As of the withdrawal date</b> the following UK certifications or licenses will no longer be valid in the EU: Pilot licences, pilot medical certificates, certificates for pilot training organisations, certificates for aero-medical centres, certificates for flight simulation training devices, certificates for persons responsible for providing flight training, flight simulation training or assessing pilots' skill, and certificates for aero medical examiners,	Irish people who are certified in one or more of these occupations will be required to be recertified in one of the EU 27 member states in order to continue in employment or participate in the EU labour market.	WITHDRAWAL OF THE UNITED KINGDOM AND EU AVIATION SAFETY RULES
Transport Air Safety	As of the withdrawal date the following UK certifications or licenses will no longer be valid in the EU: Certificates for air operators and attestations for the cabin crew,	Irish people who are certified in one or more of these occupations will be required to be recertified in one of the EU 27 member states in order to continue in employment or participate in the EU labour market.	WITHDRAWAL OF THE UNITED KINGDOM AND EU AVIATION SAFETY RULES

Category	If no agreement is reached:	Consequence	EU Document
Transport Air Safety	As of the withdrawal date the following UK certifications or licenses will no longer be valid in the EU: Certificates for aerodromes, certificates for ATM/ANS providers, licences and medical certificates for air traffic controllers, certificates for air traffic controller training organisations, certificates for aero medical centres and aero medical examiners responsible for air traffic controllers, certificates for persons responsible for providing practical training or assessing the skills of air traffic controllers.	Irish people who are certified in one or more of these occupations will be required to be recertified in one of the EU 27 member states in order to continue in employment or participate in the EU labour market.	WITHDRAWAL OF THE UNITED KINGDOM AND EU AVIATION SAFETY RULES
Transport Air Safety	CERTIFICATES ISSUED BY THE LEGAL AND NATURAL PERSONS CERTIFIED BY THE COMPETENT AUTHORITIES OF THE UNITED KINGDOM: Certificates will be valid after the withdrawal date for parts or appliances which were installed prior to the withdrawal date and in compliance with the applicable EU airworthiness requirements, in an aircraft covered by a valid certificate of airworthiness issued prior to the withdrawal date by an EU 27 national authority	UK certified components that are in stock but not yet installed can no longer be installed after the withdrawal date. To be installed they need to be recertified in an EU 27 member state.	WITHDRAWAL OF THE UNITED KINGDOM AND EU AVIATION SAFETY RULES
Transport Air Safety	<b>As of the withdrawal date</b> , aircraft operators from the United Kingdom will be considered as ‘third country’ operators.		WITHDRAWAL OF THE UNITED KINGDOM AND EU AVIATION SAFETY RULES
Transport Air Safety	AIRCRAFT REGISTERED IN THE UNITED KINGDOM: As of the withdrawal date aircraft registered in the United Kingdom will be considered as ‘third country’ registered aircraft. EU aircraft operators using such aircraft will need to comply with the provisions concerning the use of ‘third country’ registered aircraft. EU 27 air carriers intending to wet lease aircraft registered in the United Kingdom will be bound by the corresponding provisions relating to such third country aircraft. They will thus have to demonstrate that safety standards equivalent to those imposed by Union or member state law are met.		WITHDRAWAL OF THE UNITED KINGDOM AND EU AVIATION SAFETY RULES
Transport Air Safety	<b>As of the withdrawal date</b> , in case persons, including aviation personnel, as well as organisations located in the United Kingdom, holding UK certificates which cease to be valid as of the withdrawal date, would like to continue their activities in the EU as of that date, they would need to ensure, as of that date, compliance with certification requirements according to the EU legislation on aviation safety.	UK certified personnel and operators must recertify in one of the EU 27 member states.	WITHDRAWAL OF THE UNITED KINGDOM AND EU AVIATION SAFETY RULES

Category	If no agreement is reached:	Consequence	EU Document
Transport Air Safety	<b>As of the withdrawal date</b> , the EU aviation security rules and standards with regard to passengers, baggage, and freight arriving from a third country, particularly on transfer onto a connecting flight, will apply to passengers, baggage and freight arriving from the United Kingdom.	Additional security and customs checks will apply to traffic to and from the UK	WITHDRAWAL OF THE UNITED KINGDOM AND EU AVIATION SAFETY RULES
Transport Air Safety	As of the withdrawal date UK Certificates of airworthiness, restricted certificates of airworthiness, permits to fly, approvals of organisations responsible for the maintenance of products, parts and appliances, approvals for organisations responsible for the manufacture of products, parts and appliances, approvals for maintenance training organisations, and certificates for personnel responsible for the release of a product, part or appliance after maintenance will no longer be valid in the EU.	Irish people or entities who are certified in one or more of these occupations will be required to be recertified in one of the EU 27 member states in order to continue in employment or participate in the EU labour market.	WITHDRAWAL OF THE UNITED KINGDOM AND EU AVIATION SAFETY RULES
Transport Air Safety	<b>Aircraft search:</b> As of the withdrawal date an aircraft arriving into a critical part from the United Kingdom will be subjected to an aircraft security search any time after passenger disembarkation from the area to be searched and/or the unloading of the hold.	Additional security and customs checks will apply to traffic to and from the UK	WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF AVIATION SECURITY AND MARITIME SECURITY
Transport Air Safety	<b>Hold baggage:</b> As of the withdrawal date hold baggage of an inbound flight from the United Kingdom will be subject to security screening procedure when transferring onto a connecting flight. This means that before the hold baggage is loaded into an aircraft for the next flight, it has to undergo rescreening to the EU standard.	Transfers in the UK will take longer. Additional security and customs checks will apply to traffic to and from the UK. Passengers and their hand baggage will have to be rescreened before they can board a connecting flight to / from the UK to an EU 27 member state.	WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF AVIATION SECURITY AND MARITIME SECURITY
Transport Air Safety	<b>Passengers and their cabin baggage:</b> As of the withdrawal date passengers of a flight originating from the United Kingdom will have to undergo another set of security screening procedure when transferring onto a connecting flight.	Transfers in the UK will take longer. Additional security and customs checks will apply to traffic to and from the UK. Passengers and their hand baggage will have to be rescreened before they can board a connecting flight to / from the UK to an EU 27 member state.	WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF AVIATION SECURITY AND MARITIME SECURITY



Category	If no agreement is reached:	Consequence	EU Document
Transport Air Safety	<b>Cargo and mail – Approval of Regulated Agents and Known Consignors in the EU:</b> EU-based entities approved as Regulated Agents or Known Consignors by an EU Member State shall be recognised in all EU Member States. <b>As of the withdrawal date</b> the recognition in all Member States of approvals by the appropriate authority of the United Kingdom will lapse. Regulated Agents and Known consignors approved by the appropriate authority of the United Kingdom will no longer be part of the EU secure supply chain.	Regulated Agents and Known consignors approved by the appropriate authority of the United Kingdom will have to be certified by a competent authority in one of the EU 27 member states	WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF AVIATION SECURITY AND MARITIME SECURITY
Transport Air Safety	As of the withdrawal date Regulated Agents and Known consignors approved by the appropriate authority of the United Kingdom will no longer be part of the EU secure supply chain.	Regulated Agents and Known consignors approved by the appropriate authority of the United Kingdom will have to be certified by a competent authority in one of the EU 27 member states	WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF AVIATION SECURITY AND MARITIME SECURITY
Transport Air Safety	Cargo and mail - Designation of air carriers: As of the withdrawal date air carriers - no matter if established in the EU, in the United Kingdom, or in another third country - that transport air cargo and mail from an airport located in the United Kingdom into the EU will have to be designated by the appropriate authority of an EU 27 Member State as "Air Cargo or Mail Carrier operating into the European Union from a Third Country Airport" (ACC3) and ensure implementation of certain security measures.	Additional notifications and security checks will be imposed on UK inbound and out bound air cargo and mail. This will cause longer transit times and raise costs to consumers.	WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF AVIATION SECURITY AND MARITIME SECURITY
Transport Air Safety	Cargo and mail - Designation of the entities and operators part of the supply chain of the ACC3 air carrier: As of the withdrawal date entities and operators part of the supply chain of the ACC3 air carrier mentioned above will have to be designated as "Third Country Known Consignors" (KC3) or "Third Country Regulated Agent" (RA3) by the appropriate authority of an EU 27 Member State.	Additional certifications are needed from an EU 27 member state	WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF AVIATION SECURITY AND MARITIME SECURITY



Category	If no agreement is reached:	Consequence	EU Document
Transport Air Safety	<b>Cargo and mail - Recognition of ACC3/KC3/RA3 designations:</b> designations by the appropriate authority of an EU Member State shall be recognised in all EU Member States. As of the withdrawal date the recognition in all Member States of designations by the appropriate authority of the United Kingdom will lapse.	UK designations will no longer be valid in the EU. New designations from one of the EU 27 member states will be required.	WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF AVIATION SECURITY AND MARITIME SECURITY
Transport Air Safety	As of the withdrawal date all carriers and cargo operators in third countries that have been designated by the authority of the United Kingdom will be required to hold, as of the withdrawal date, the ACC3/KC3/RA3 status accorded by the appropriate authority of an EU 27 Member State.	UK designations will no longer be valid in the EU. New designations from one of the EU 27 member states will be required.	WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF AVIATION SECURITY AND MARITIME SECURITY
Transport Air Safety	As of the withdrawal date the recognition in all Member States of approvals for regulated suppliers by the appropriate authority of the United Kingdom. As a result, regulated suppliers approved by the appropriate authority of the United Kingdom will be required to hold, as of the withdrawal date, the approval of an appropriate authority of an EU 27 Member State.	Additional certifications are needed from an EU 27 member state	WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF AVIATION SECURITY AND MARITIME SECURITY
Transport Air Security	In respect of products, parts and appliances certified before the withdrawal date and put in use in the EU before the withdrawal date and/or relevant organisations or persons requiring certification, the EU Commission is considering whether any steps are needed to facilitate continued compliance with EU law.		WITHDRAWAL OF THE UNITED KINGDOM AND EU AVIATION SAFETY RULES
Transport Inland waterways	As of the withdrawal date, the EU rules in the field of inland waterway transport no longer apply to the United Kingdom.		WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF INLAND WATERWAYS
Transport Inland waterways	<b>As of the withdrawal date,</b> operators that have their establishment in the United Kingdom and/or vessels registered in the United Kingdom will no longer fulfil these requirements and will therefore no longer have access to the internal inland waterway transport market of the Union.		WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF INLAND WATERWAYS

Category	If no agreement is reached:	Consequence	EU Document
Transport Inland waterways	<b>As of the withdrawal date</b> , carriers established in the United Kingdom and vessels' owners who are United Kingdom nationals or legal persons that have their registered place of business in the United Kingdom will no longer fulfil these requirements and will therefore no longer be entitled to carry out cabotage activities within the Union.		WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF INLAND WATERWAYS
Transport Inland waterways	<b>As of the withdrawal date</b> , boat masters' certificates issued by the UK in conformity with Directive 96/50 will no longer be valid for any waterway within the Union.		WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF INLAND WATERWAYS
Transport Maritime Safety	As of the withdrawal date, all scheduled maritime services such as ferry links between the United Kingdom and EU Member States, will be subjected to the mandatory provision of security information.	Additional notifications and security checks will be imposed on UK inbound and out bound maritime trade and passenger traffic. This will cause longer transit times and raise costs to consumers.	WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF AVIATION SECURITY AND MARITIME SECURITY
Transport Maritime Safety	As of the withdrawal date United Kingdom personnel (thus holding a security clearance from the United Kingdom) can no longer carry out the security inspections because personnel carrying out security inspections or handling confidential information requires a security vetting of the EU Member State of which the person concerned is a national.	New certification in an EU 27 member state will be required.	WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF AVIATION SECURITY AND MARITIME SECURITY
Transport Maritime Transport	<b>Intra-Union shipping services and third-country traffic:</b> As of the withdrawal date UK established companies will no longer benefit from the EU freedom to provide maritime transport services between Member States, as well as between Member States and third countries, in respect of: "nationals of Member States who are established in a Member State other than that of the person for whom the services are intended"; "nationals of the Member States established outside the EU", or "shipping companies established outside the EU and controlled by nationals of a Member State, if their vessels are registered in that Member State in accordance with its legislation."	UK shipping companies will lose traffic rights they enjoy under EU negotiated agreements.	WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF MARITIME TRANSPORT

Category	If no agreement is reached:	Consequence	EU Document
Transport Maritime Transport	<b>Cabotage:</b> As of the withdrawal date it will no longer be possible for UK established companies to provide maritime transport services in accordance with EU Regulations if the conditions for constituting a Community ship owner are no longer fulfilled, unless EU 27 national legislation allows access to Cabotage to vessels flying the flag of a third country.		WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF MARITIME TRANSPORT
Transport Maritime Transport	<b>Recognition of organisations:</b> As of the withdrawal date, the United Kingdom will no longer be in a position to participate in the assessments carried out in accordance with Article 8 of Regulation (EC) No 391/2009 of organisations initially recognised by the UK. The withdrawal of the United Kingdom does not as such affect the recognitions by the Commission Recognised Organisations are to be assessed on a regular basis (at least every two years) by the Commission, together with the Member State that initially submitted the request for recognition for the organisation in question.		WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF MARITIME TRANSPORT
Transport Maritime Transport	Port State Control: EU 27 Member States will continue to verify United Kingdom ships calling to EU ports, as of the withdrawal date, the Port State Control inspection system set out in Directive 2009/16/EC no longer applies in the United Kingdom. Relations between the United Kingdom and the EU in respect of Port State Control will be governed by the Paris Memorandum of Understanding on Port State Control.	Additional notifications and security checks will be imposed on UK inbound and out bound maritime trade and passenger traffic. This will cause longer transit times and raise costs to consumers.	WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF MARITIME TRANSPORT
Transport Maritime Transport	<b>Operations of passenger ships:</b> As of the withdrawal date, the UK will no longer to carry out mandatory inspections to provide for assurance of safe operation of regular ro-ro ferry and high-speed passenger craft services to or from ports of the EU in accordance with Directive 1999/35/EC.	UK maritime law and safety law applies	WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF MARITIME TRANSPORT

Category	If no agreement is reached:	Consequence	EU Document
Transport Maritime Transport	<b>Safety of fishing vessels:</b> UK fishing vessels shall be subject to control by a Member State when in its ports. According to Article 3(5) of Directive 97/70/EC, 17 Member States shall prohibit fishing vessels flying the flag of a third country <b>(including the UK after the withdrawal date)</b> from operating in their internal waters or territorial sea or landing their catch in their ports unless they are certified by their flag State administration to comply with the requirements referred to in Article 3(1)-(4) and Article 5 of Directive 97/70/EC, namely the technical provisions of that Directive.	Additional certification is required for UK fishing vessels looking to enter or land catch at Irish ports.	WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF MARITIME TRANSPORT
Transport rail	<b>As of the withdrawal date,</b> the EU rules in the field of rail transport no longer apply to the United Kingdom.		WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF RAIL TRANSPORT
Transport rail	<b>MANAGEMENT AND USE OF RAILWAY INFRASTRUCTURE: As of the withdrawal date,</b> licences issued by the United Kingdom will no longer be valid in the EU 27. Railway undertakings holding such a licence and wishing to continue operating in the EU 27 as of the withdrawal date will have to apply for a new licence in an EU 27 Member State in accordance with Chapter III of Directive 2012/34/EU.		WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF RAIL TRANSPORT
Transport rail	<b>MANAGEMENT AND USE OF RAILWAY INFRASTRUCTURE: As of the withdrawal date,</b> Railway undertakings providing cross-border services between the United Kingdom and the EU 27 and wishing to continue after the withdrawal date, will have to comply with the legal requirements applicable both in the EU 27 and the United Kingdom. These undertakings will therefore have to ensure that they have a licence valid in the EU 27 for the sections of the cross-border services located in the territory of the EU 27. It follows from Article 17(1) of Directive 2012/34/EU that establishment in one of the EU 27 Member States is a precondition for acquiring an EU 27 licence.		WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF RAIL TRANSPORT

Category	If no agreement is reached:	Consequence	EU Document
Transport rail	<b>RAILWAY SAFETY: As of the withdrawal date</b> , safety certificates delivered in the United Kingdom pursuant to Article 10 of the Directive will no longer be valid in the EU 27. Railway undertakings holding such a certificate and wanting to continue operating in the EU- 27 as of the withdrawal date will have to apply for a new certificate in an EU 27 Member State <sup>6</sup> in accordance with Article 10 of Directive 2004/49/EC.		WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF RAIL TRANSPORT
Transport rail	<b>RAILWAY SAFETY: ECMs: As of the withdrawal date</b> , certificates issued by the United Kingdom will no longer be valid in the EU 27. ECMs holding a certificate delivered by the United Kingdom and wishing to continue their professional activities in the European Union will have to apply for a certificate in an EU 27 Member State. According to Article 14a (4) of Directive 2004/49/EC, each entity in charge of maintenance (ECM) of freight wagons is subject to a certification requirement		WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF RAIL TRANSPORT
Transport rail	<b>RAILWAY SAFETY: ECMs:</b> As of the withdrawal date, ECMs may apply for a certificate according to the legal framework of the Convention concerning international carriage by rail (COTIF), to which the 26 EU Member States with a railway system are parties.		WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF RAIL TRANSPORT
Transport rail	<b>RAILWAY INTEROPERABILITY:</b> Placing on the market and use of interoperability constituents: According to Articles 10 and 13(2) of Directive 2008/57/EC on the interoperability of the rail system within the Community, the placing on the market of an interoperability constituent may require an assessment of conformity/suitability for use established by a Notified Body. Where an assessment established by a Notified Body is required, the consequences of the withdrawal of the United Kingdom from the EU set out in the generic notice on industrial products referred to in the preceding paragraph fully apply.		WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF RAIL TRANSPORT
Transport rail	<b>RAILWAY INTEROPERABILITY:</b> An interoperability constituent placed on the market before the withdrawal date with a certificate of conformity/suitability for use issued by a Notified Body in the United Kingdom can be used, during the duration of validity of the certificates of conformity/suitability for use, in subsystems or vehicles the placing in service of which has been authorised before the withdrawal date.		WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF RAIL TRANSPORT

Category	If no agreement is reached:	Consequence	EU Document
Transport rail	<p><b>RAILWAY INTEROPERABILITY:</b> Placing in service of vehicles and subsystems: According to Article 21 of Directive 2008/57/EC, before being used on a network, a railway vehicle has to be authorised to be placed in service by the national safety authority which is competent for this network in accordance with that Directive. Authorisations for placing in service of vehicles pursuant to Article 21 of Directive 2008/57/EC delivered in the EU 27 before the withdrawal date will retain their validity after the withdrawal date even if they have been authorised based on certificates of verification issued by Notified Bodies / Designated Bodies in the United Kingdom. The same applies to authorisations for placing in service of subsystems according to Articles 15 and 20 of Directive 2008/57/EC. As of the withdrawal date, however, authorisations for placing in service pursuant to Articles 15, 20 and 21 of Directive 2008/57/EC shall be based on certificates of verification issued by Notified Bodies/Designated Bodies in the EU 27.</p>		WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF RAIL TRANSPORT
Transport rail	<p><b>RAILWAY INTEROPERABILITY:</b> As of the withdrawal date, the use of railway material authorised in the United Kingdom in international traffic in the EU will be governed by COTIF, and in particular the Appendices G and F thereto.</p>	<p><i>Convention concerning International Carriage by Rail (COTIF) The aim of the Organisation is to promote, improve and facilitate, in all respects, international traffic by rail. OTIF will have to be capable of dealing with all aspects of international rail traffic, with a view to promoting, improving and facilitating it.</i></p>	WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF RAIL TRANSPORT
Transport rail	<p><b>TRAIN DRIVER CERTIFICATION:</b> As of the withdrawal date, licenses and certificates for train drivers issued in the United Kingdom will no longer be valid in the EU 27.</p>		WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF RAIL TRANSPORT

Category	If no agreement is reached:	Consequence	EU Document
Transport rail	<p>TRAIN DRIVER CERTIFICATION: Before the withdrawal date Train drivers with a licence/certificate issued in the United Kingdom and working in another Member State should take the necessary steps in order to obtain certification documents valid in the EU 27 as of the withdrawal date. railway undertakings or infrastructure managers in the EU employing train drivers with certification documents issued in the United Kingdom are advised to inform these persons of the need to obtain new certification documents valid in the EU 27 as of the withdrawal date.</p>		<p>WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF RAIL TRANSPORT</p>
Transport rail	<p>TRAIN DRIVER CERTIFICATION: As of the withdrawal date Railway undertakings providing cross-border services between the United Kingdom and the EU 27 and wishing to continue after the withdrawal date, will have to ensure that the drivers on the sections of such cross-border services which are located in the EU 27 territory have required licences/certificates issued in the EU 27.</p>		<p>WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF RAIL TRANSPORT</p>
Transport Road	<p>Certificate of professional competence for road transport operators / transport managers: natural persons engaged in the occupation of road transport operator in the EU and transport managers employed by an undertaking engaged in the occupation of road transport operator have to hold a certificate of professional competence issued by authorities of a EU Member State. As of the withdrawal date, certificates of professional competence issued by an authority of the United Kingdom or a body authorised by the United Kingdom will no longer be valid in the EU 27.</p>	<p><b>UK Certificates of professional competence will have to be sought to operate as a new road transport operator or transport manager.</b></p>	<p>WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF ROAD TRANSPORT</p>



Category	If no agreement is reached:	Consequence	EU Document
Transport Road	As of the withdrawal date, drivers who are United Kingdom nationals and do not constitute long-term residents in the Union, and who work for a Union haulier holding a Community licence require a driver attestation. This driver attestation shall be issued by the competent authorities of the Member State of establishment of the haulier holding a Community licence for each driver who is neither an EU national nor a long-term EU resident whom that haulier lawfully employs or who is put at his disposal.	UK transport drivers in the EU will require additional attestations (permission / certificate). <b>Irish transport drivers operating in or transiting the UK may have to have additional permissions / licences / certificates.</b>	WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF ROAD TRANSPORT
Transport Road	Drivers in the European Union of a vehicle intended for the carriage of goods or for the carriage of passengers need to hold a certificate of professional competence certifying the initial qualification or periodic training and issued by competent authorities of an EU Member State or by an approved training centre in an EU Member State. As of the withdrawal date, certificates of professional competence issued by the United Kingdom or by an approved training centre in the United Kingdom will no longer be valid in the EU 27.	UK transport drivers driving in the EU will require a certificate of professional competence from the member state in which his employers business is established. <b>Irish transport drivers operating in or transiting the UK may have to have additional permissions / licences / certificates.</b>	WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF ROAD TRANSPORT
Transport Road	As of the withdrawal date, drivers who are nationals of the United Kingdom but employed by an undertaking established in the Union or Union nationals resident in the United Kingdom but employed by an undertaking established in the Union will have to follow the professional drivers training in the EU 27 Member State where the undertaking employing them is established.	UK transport drivers driving in the EU will require training in the member state in which his employers business is established. <b>Irish transport drivers operating in or transiting the UK may have to have additional UK based training</b>	WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF ROAD TRANSPORT
Transport Road	Driving licence: As of the withdrawal date, a driving licence issued by the United Kingdom will no longer be recognised by the Member States on the basis of EU legislation. <b>However, the recognition of driving licences issued by third countries is not addressed in Union law but regulated at Member States level.</b>	Present Irish legislation allows a UK license holder to drive in Ireland for one year after entering the country. Similar recognition is given to Irish driving licenses in the UK.	WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF ROAD TRANSPORT



Category	If no agreement is reached:	Consequence	EU Document
Transport Road	Undertakings engaged in the occupation of road transport operator in the European Union must have an effective and stable establishment in an EU Member State. As of the withdrawal date, undertakings that have their establishment in the United Kingdom will no longer fulfil this requirement.	<b>UK established road transport companies will not be EU compliant.</b>	WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF ROAD TRANSPORT
Transport Road	An undertaking which engages in the occupation of road transport operator must designate a transport manager who must also be resident in an EU member state. . As of the withdrawal date, transport managers resident in the United Kingdom working for a Union road transport operator will no longer fulfil this requirement. Undertakings established in the Union that only have a transport manager resident in the United Kingdom can no longer engage in the occupation of road transport operator within the EU 27.	<b>UK established road transport companies must have a transport manager based in one of the EU 27 countries.</b>	WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF ROAD TRANSPORT
Transport Road	As of the withdrawal date, a Community licence issued by the competent authorities of the United Kingdom will no longer be valid in the EU 27. Hauliers established in the United Kingdom will no longer have access to the internal road haulage market in the Union.	<b>Irish hauliers with UK certification will have to apply for a new EU certificate</b>	WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF ROAD TRANSPORT
Transport Road	United Kingdom hauliers will no longer be able to perform Cabotage operations within any of the EU 27 Member States.	<b>Irish hauliers ma, if the UK adopts the same rules, will not be able to pick up cargo in the UK</b>	WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF ROAD TRANSPORT
Transport Road	The multilateral quota system managed by the European Conference of Ministers of Transport (now International Transport Forum) would apply at that point. Hence, cross-trade operations (i.e. the carriage of goods from country A to country B by a haulier established in country C) by United Kingdom hauliers in the Union and by Union hauliers from or to the United Kingdom could be carried out under that system and within the limits thereof.	<b>A new legal regime will apply to the UK</b>	WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF ROAD TRANSPORT

Category	If no agreement is reached:	Consequence	EU Document
<b>Transport Road</b>	The international carriage of passengers by coach and bus is subject to the possession of a Community licence issued by the competent authorities of the Member State of establishment (e.g. where the business is based). As of the withdrawal date, Community licences issued by the United Kingdom will no longer be valid in the EU 27.	<b>Holders of EU licenses issued by the UK authorities will have to get replacement ones issued by an EU 27 member state</b>	WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF ROAD TRANSPORT
<b>Transport Road</b>	Regular international services between Member States are subject to an authorisation. As of the withdrawal date, authorisations involving the United Kingdom (for pick up or set down of passengers) are no longer valid in the EU 27.	<b>Additional authorizations may be necessary for scheduled bus and coach services transiting the UK for / to and from the EU.</b>	WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF ROAD TRANSPORT
<b>Transport Road</b>	As of the withdrawal date, the United Kingdom is no longer within the scope of the Interbus Agreement on the international occasional carriage of passengers by coach and bus, the very similar ASOR Agreement of 1982, as well as the Agreement between the European Community and the Swiss Confederation on the Carriage of Goods and Passengers by Rail and Road.	<b>The cost and administrative complexity of Coach and bus travel from Ireland to the UK or via the UK to European destinations may rise.</b>	WITHDRAWAL OF THE UNITED KINGDOM AND EU RULES IN THE FIELD OF ROAD TRANSPORT