

The 99% “not at risk” estimate

- 1. What analysis underpins the estimate that more than 99% of goods movements/sales into Northern Ireland will be classified as “not at risk”, with no duty payable?**
 - HMRC examined data available for movements into Northern Ireland from a 12-month period to reach this estimate that more than 99% of goods moving in parcels will be eligible to move ‘not at risk’ of entering the EU. This includes goods that are currently moving under the facilitations established under the Windsor Framework, including the UK Carrier Scheme (UKC) and UK Internal Market Scheme (UKIMS). This also includes movements of goods sent from a business outside of the UK and EU to a private individual in Northern Ireland, in line with the position confirmed with the EU.
 - This position confirms goods moving to consumers in Northern Ireland from outside the UK or EU can move without paying EU customs duty so long as they are cleared in free circulation in Great Britain before they enter Northern Ireland and meet the eligibility requirements. Movements that fall outside of these arrangements account for less than 1% of all goods moved into Northern Ireland annually.
- 2. How sensitive is the 99% estimate to changes in global trading conditions, particularly the introduction or escalation of tariffs, sanctions or other trade barriers involving the EU and major trading partners such as the US, China or EEA countries?**
 - Under the Windsor Framework, goods that are Category 1 goods (as set out in Annex IV of JCD 1/2023) are automatically ‘at risk’. This means that if goods were added to this definition, it could affect the 99% estimate. While it is not possible to anticipate all potential future scenarios, from what we know about the nature and type of goods that move in parcels and are valued < 150 euros/£135, we would expect the impact of such changes to be low.
- 3. Has HMRC undertaken any impact or scenario analysis of how such developments could affect the proportion of goods entering Northern Ireland classified as “at risk”, and the consequent impact on Northern Ireland businesses and consumers?**
 - We are confident that impacts to consumers in Northern Ireland will be minimal. We are unable to provide a detailed assessment for specific scenarios; however, we will continue to monitor any changes.
- 4. Can HMRC provide the underlying figures and methodology behind the 99% estimate, including the anticipated number and value of movements/items that would be classified as “at risk” and “not at risk”?**
 - The methodology has been set out in response to question 1. Further detail and figures have not yet been published.
 - HMRC intends to publish its *Summary of movements of goods into Northern Ireland from Great Britain 2025* publication later this year.

Low-value parcels and “at risk” goods

5. What types of low-value parcels could be classified as “at risk” under the relevant arrangements?

- In general, goods that are not eligible to move under the facilitations under the Windsor Framework, such as UKC and UKIMS, would be classified ‘at risk’
- This can include goods which are destined for the EU. As an example, a movement cleared into free circulation in Northern Ireland which is consigned for an Irish resident would be considered ‘at risk’.
- As per the response to Q2, Category 1 goods are not eligible to move under these schemes and are automatically ‘at risk’. For instance, ceramic tableware of Chinese origin that is subject to an EU trade defence measure being sent to a business or consumer in Northern Ireland, must be declared ‘at risk’. Goods destined for a business in Northern Ireland that are not eligible to move under UKIMS, such as goods subject to commercial processing, must also be considered ‘at risk’.

6. What criteria are used to determine whether a parcel is considered “at risk” or “not at risk”, and how will these criteria operate in practice for goods moving into Northern Ireland?

- The criteria for determining whether goods moving to businesses and consumers in Northern Ireland are eligible to move ‘not at risk’ under the Windsor Framework facilitations are set out in the Joint Committee Decisions 1/2023. As per the response to Q1, eligible goods moved in parcels to a private individual in Northern Ireland from a business outside the UK or EU can do so ‘not at risk’ under the UKC provided they are moved by a UKC authorised carrier and are cleared into free circulation in Great Britain before they enter Northern Ireland.

7. Can HMRC provide practical examples of the types of parcels that could fall into the “at risk” category and explain the resulting cost, customs and administrative implications for Northern Ireland consumers and businesses?

- A consignment including a single porcelain cup of Chinese origin (commodity code 6911100090) sent to a consumer in Northern Ireland that costs £50 and is subject to an EU anti-dumping duty would be considered ‘at risk’. It would therefore be subject to the €3 per item customs duty, introduced on 1 July 2026 under the previous regulation and the €2 per item handling fee, introduced under the regulation currently under consideration. Both of these are charged in pounds sterling.
- There are no additional administrative implications as these movements require a customs declaration currently and have done since the parcels arrangements came into effect under the Windsor Framework on 1 May 2025.

Union Customs Code changes and notification

8. Given the application of the Union Customs Code (UCC) in Northern Ireland, how will Northern Ireland departments, businesses and other affected stakeholders be informed of amendments to the UCC?

- HMRC will communicate relevant UCC changes through established stakeholder forums, including the Joint Customs Consultative Committee and its Northern Ireland sub-group, which meets monthly with trade associations. HMRC will also continue to engage directly with Northern Ireland departments and affected sectors where changes have specific operational impacts.
- This approach has already been used for the handling fee. HMRC discussed the measure with members of the Joint Customs Consultative Committee and its Northern Ireland sub-group and sought views on its practical impact.

9. Will notification be provided in advance of UCC changes taking effect, particularly where businesses may need to alter systems or processes quickly?

- HMRC will provide as much advance notice as possible to affected businesses, particularly where they may need to update their systems or processes. Relevant changes will be communicated through established stakeholder forums, supported by targeted engagement and guidance. HMRC will work with the European Commission and affected stakeholders to support smooth implementation.

10. What is the formal mechanism for communicating UCC changes to Northern Ireland, and who determines whether individual UCC reforms are relevant or applicable to Northern Ireland?

- The UK government engages with the EU regularly on the implementation of legislation under the Windsor Framework in a variety of fora and will continue to do so. Businesses and other affected stakeholders will be engaged at appropriate stages as the detailed provisions emerge, ensuring that operational impacts are understood and reflected in those discussions.

11. Where UCC reforms are subject to discussion before applying in Northern Ireland, who determines whether a particular reform is appropriate or applicable, and what opportunity is there for Northern Ireland interests or business impacts to be considered?

- As above, HMRC will communicate relevant UCC changes through established stakeholder forums, including the Joint Customs Consultative Committee and its Northern Ireland sub-group, which meets monthly with trade associations. HMRC will also continue to engage directly with Northern Ireland departments and affected sectors where changes have specific operational impacts.

Great Britain as a third country

12. Given that Great Britain is treated as a third country for the purposes of the UCC, what are the practical implications for movements of goods between Great Britain and Northern Ireland when EU customs rules or requirements change?

- The Windsor Framework arrangements are designed to protect the smooth flow of goods from Great Britain to Northern Ireland. While changes to EU customs rules may require some processes or systems to be updated, they do not automatically result in additional requirements for every movement. Under the UCC reform package, the schemes and facilitations established under the Windsor Framework, including those that allow eligible goods not destined for the EU to move as “not at risk”, will continue to support the smooth movement of goods into Northern Ireland.

13. Can HMRC clarify how future amendments to EU rules governing trade with third countries could affect GB to NI movements, including whether those changes would automatically alter customs requirements applying to such movements?

- Northern Ireland remains within the UK's customs territory. The Windsor Framework already provides mechanisms to accommodate changes in EU trade policy and to ensure that businesses do not pay duty, or can reclaim it, where goods moving from Great Britain to Northern Ireland remain in Northern Ireland. If, in exceptional circumstances, a particular provision was expected to have a specific impact on Northern Ireland, it would be considered on its individual merits and raised with the European Commission for discussion, in line with established practice.

From: DSC

Sent: 15 October 2026 17:08

To: TEO Democratic Scrutiny Committee

Subject: [RESPONSE BY 11AM ON 19 OCTOBER] - Regulation (EU) 2026/2108 establishing the Union Customs Code and the European Union Customs Authority, and repealing Regulation (EU) No 952/2013

Good afternoon,

Regulation (EU) 2026/2108 establishing the Union Customs Code and the European Union Customs Authority, and repealing Regulation (EU) No 952/2013

At its meeting on 15 October 2026, the Windsor Framework Democratic Scrutiny Committee (DSC) heard departmental oral evidence from an official in the Department for the Economy (DfE) on the abovementioned published replacement EU act.

During oral evidence, the DfE official agreed to provide further information to the DSC on a number of points raised by Members, including:

- HMRC's analysis of the likely impact of future global trade instability, sanctions, or trade disputes on the proportion of distance sales which UKG expects to be classified as 'not at risk' and therefore not subject to additional fees (as stated at paragraph 24 of the UK Government's [Explanatory Memorandum](#));
- Information on the actual volume/number, and types, of parcels moving into Northern Ireland that would be considered 'at risk'; and
- Information on how public bodies in Northern Ireland will be notified of relevant changes relating to the Union Customs Code;

As the Committee will agree its final inquiry report on Thursday 22 October, I would be grateful for this information to be provided by 11am on Monday 19 October.

In order to assist this, the Hansard of today's evidence will be on the [Committee's website](#) once available (which should be in the coming days). However, in light of the timeframes outlined above, you may wish to note that the video of the oral evidence session is already available [here](#).

Many thanks