

# Compliance Briefing 2024-25

TRANSPORT MANAGER CALENDAR



This paper is designed to provide members with an insight into some of the changes we can expect to see throughout the remainder of 2024 and into 2025 and is correct at the time of writing.

Contact Logistics UK Member Advice Centre for further information:  
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Subjects covered include:

- Northern Ireland Central Licensing Office
- Northern Ireland Green Lane
- Northern Ireland Retail Movement Scheme 'Not for EU' labelling
- Direct Vision Standard (DVS)
- EU Entry and Exit System (EES)
- Alternatively fuelled vehicles
- EU drivers' hours records
- Smart tachograph 2 – retrofit
- Dangerous Goods ADR update
- Fleet Operator Recognition Scheme (FORS)
- Vehicle Certification Agency (VCA) implement Full GB Type Approval Scheme
- Vehicle Excise Duty
- Guide to Maintaining Roadworthiness (GTMR)
- Light commercial vehicles used for international transport

## 16 September 2024

### **Northern Ireland Central Licensing Office**

Administration of the Northern Ireland operator licensing system currently takes place at Hillcrest House, Harehills in Leeds. The Department for Infrastructure's (DfI) Transport Regulation Unit (TRU) notified that the Northern Ireland Licensing Team are moving to new premises, the new address is:

DfI Central Licensing Office,  
Quarry House,  
Quarry Hill,  
Leeds,  
LS2 7UE.

From 16 September 2024 any postal correspondence for the Northern Ireland licensing team should be directed to the new Quarry House address. Note that telephone numbers are not affected.

## 30 September 2024

### **Northern Ireland Green Lane – Freight and parcels**

From 30 September 2024, the virtual Green Lane under the Windsor Framework was due to be expanded to include qualifying freight and parcels moved into Northern Ireland. Logistics UK had been lobbying for a delay as readiness and compliance was made impossible, though no fault of the industry. The expected go live date is now 31 March 2025.

After this date, to move consumer parcels from GB to NI, a carrier must be registered with the new UK Carrier Scheme. To move business to business parcels, either the sending or receiving business must be registered with the UK Internal Market Scheme.

Freight and parcels at risk of moving into the EU, or intended for international destinations including the EU, passing through NI, will not be eligible for the Green Lane. Instead, these will qualify for the Red Lane where full international customs checks and duties will be applied.

It's important to note that goods will not travel down a physical green or red lane like you would see at passenger airport customs, they are virtual rules applied to goods depending on their destination.

## October 2024

### **'Not for EU' labelling expanded**

This introduces Phase 2 of the Northern Ireland Retail Movement Scheme and 'Not for EU' labelling requirements. Phase 1 requirements introduced labelling on prepacked meat and minimally processed dairy products like fresh milk and cream moving from GB to NI only. Phase 2 is to include all milk and dairy products; for example, butter and ice cream will now be included.

A previous consultation by government indicated that the geographical range of labelling would also be expanded on this date from products moving from GB to NI only, to being applied to all meat and dairy products retailing throughout the whole of the UK, ie England, Scotland and Wales. On 30 September the government announced they will not

proceed with labelling in GB and will continue monitoring to ensure supermarket supplies to NI are safeguarded.

## 28 October 2024

### **Direct Vision Standard – Phase 2**

Transport for London introduced the Direct Vision Standard in March 2021 which restricted vehicles exceeding 12t maximum authorised mass from operating in London without a HGV safety permit. To obtain a permit, vehicles are given a zero – five star rating depending on how much the driver can see out of the cab.

The required vision parameters escalate from 28 October 2024 to Phase 2 where the minimum standard to receive an HGV safety permit rises to a three star rating. For those zero, one and two star rated vehicles that don't meet this standard, they need to be fitted with systems designed to improve indirect vision (known as progressive safe systems) to obtain a permit. Systems include:

- Camera Monitoring Systems; to eliminate any remaining blind spots and provide visibility of vulnerable road users.
- Blind Spot Information System; to provide full coverage down the nearside of rigid vehicles to detect vulnerable road users. For articulated combinations, a system must be fitted to the tractor unit, and are recommended on the trailer.
- Moving Off Information System; sensors must be fitted to the front of a vehicle to prevent collisions at the frontal blind spot zone when a vehicle moves off from rest.
- Warning vulnerable road users of intended manoeuvres; audio warnings must be fitted to all vehicles.

Following lobbying from Logistics UK and other stakeholders around the challenges of component supply and fitment, a six month grace period has been confirmed with TfL to allow operators with eligible phase two vehicles to conform. To qualify for the exemption, operators must firstly register their eligible vehicles (existing zero, one and two star vehicles) with TfL, including supplying evidence that an equipment installation appointment has been made. The exemption ends on 4 May 2025.

## 10 November 2024

### **EU Entry and Exit System**

The EU Entry and Exit System (EES) is an IT system for registering travellers from non-EU countries each time they cross a border into or out of the EU. It is due to come into effect on 10 November and will include the UK.

Irish passport holders will not need to be processed through the EES, due to having EU citizenship, and will simply have to present their passport. UK passport holders will go through a digitised EES process with biometric scanning of passengers and scanning of their passport or other travel documents at the border prior to crossing.

According to the European Commission, EES applies when entering 25 member states (with the exception of Cyprus and Ireland) and four non-EU countries (Norway, Iceland, Switzerland and Lichtenstein) that are part of the border-free Schengen area along with most EU Member States. Note that

for travel from the UK to the Republic of Ireland there is a Common Travel Area, operating separately to Schengen, and Ireland will not be operating EES.

Irish passport holders can travel freely within the EU providing they have a valid in-date passport. For other travellers, EES will capture the date and place of entry/exit, traveller name, type of travel document and biometric data such as fingerprints and facial images. The data will be used for ensuring compliance with the rules of the Schengen area on entry and permitted length of stays for non-EU/non-Schengen nationals (90 days within a 180 day period).

For those that don't require a visa to enter the EU, fingerprints and facial images will be taken the first time they cross a border into the EU (visa holders will have already provided fingerprints as part of their visa application). For data protection, biometric data captured will be deleted three years after the last trip to a country using EES.

While Northern Irish hauliers who hold Irish passports will not have to be processed via EES when travelling to the European continent via the Short Straits in GB, they could be impacted by knock on delays to freight from the processing of passengers, particularly at peak passenger periods. Logistics UK continues to work with government and operators of services to minimise the impact.

## December 2024

### Alternatively fuelled vehicles (AFV)

The added weight of alternative fuel technology such as batteries puts these vehicles at a distinct disadvantage when it comes to useable payload. In January 2024 the Department for Infrastructure (DfI) consulted on amendments to the *Motor Vehicles (Authorised Weight) Regulations (Northern Ireland) 1999* with the intention to increase the maximum authorised mass (MAM) by up to one additional tonne for certain AFVs and up to two tonnes for certain zero emission vehicles (ZEV).

This would align with the GB position (which changed in July 2023) and provide additional weight capacity to offset the additional powertrain weight and allow AFVs payload to be more comparable to internal combustion engine (ICE) vehicles.

The table below shows the AFVs proposed to have the MAM increased by one additional tonne, and zero emission vehicle types proposed to have the MAM increased by up to two additional tonnes.

Type	Number of axles	ICE MAM (Tonnes)	One tonne additional allowance for AFVs	Two tonne additional allowance for ZEVs
Rigid goods vehicle*	2	18	Will be introduced	Will be introduced
Rigid goods vehicle	3	25-26	Will be introduced	Will be introduced
Articulated buses	3	28	Has already been permitted	Will be introduced
Articulated and drawbar combinations	4	26 or 38	Has already been permitted	Will be introduced
Articulated and drawbar combinations	5 or 6	40	Has already been permitted	Will be introduced

\*Buses have already been permitted a higher weight limit.

The proposal makes no changes to individual axle maximum authorised mass and there are also no extra weight allowances for either AFVs or ZEVs operating at the heaviest weights:

- 32 Tonnes; four axle rigid vehicles.
- 44 Tonnes; six axle articulated and drawbar combinations.

Legislation is expected to go through the Northern Ireland Assembly before the end of the year.

Note that if a 4.25t AFV is allowed to operate in Northern Ireland, category B (car) driving licence holders will still only be able to drive vehicles up to and including 3.5t. Logistics UK will continue lobbying for a derogation to allow category B licence holders to drive AFVs exceeding 3.5t up to and including 4.25t.

## 31 December 2024

### EU drivers' hours records

Currently, drivers must be able to produce driver hours record sheets, manual records and printouts evidencing the last 28 days of activity in the EU as they do in the UK. This period is due to be extended to 56 days in the EU from 31 December 2024 which will mean that UK drivers travelling on international journeys will have to comply.

As a result of lobbying in the EU, the EU drivers hours record keeping requirements were revisited in Q2 2024 with a proposal to remove the need for occasional drivers to provide the full 28 days of records, if away from the vehicle for more than one week. In such a case, the proposal was for the need to provide evidence of activity back to the last full weekly rest period. However, this process was paused for further consideration and at the time of writing there are no other proposals being put forward.

Note that UK legislation is unaffected by these events. Unless DfT propose a change to the requirements in the UK they will remain unchanged, requiring complete driver records for the last 28 days of activity to be available.

## 31 December 2024

### Smart tachograph 2 - retrofit

The requirements of *Regulation (EU) No 165/2014* provides a timeline for implementation of smart tachograph 2 and means that UK vehicles crossing borders will need to have the newer devices installed. As such, any vehicles currently equipped with analogue or digital 1b tachographs used for international journeys will need to be retrofitted with smart tachograph 2 devices from no later than 31 December 2024.

Vehicles fitted with smart tachograph 1 used for international journeys can continue in use until 21 August 2025, see below.

## 1 January 2025

### **Dangerous Goods ADR**

The international rules regarding the carriage of dangerous goods (ADR) are updated every two years, 2025 is a change year. Operators may operate under the outgoing or the incoming rules from January to June 2025, but from 1 July 2025 must adhere to the new rules.

## 2 January 2025

### **Fleet Operator Recognition Scheme (FORS) – Version 7**

FORS is a voluntary accreditation scheme designed for fleet operators to demonstrate they have reached a required standard, either bronze, silver or gold. The FORS standard promotes operators working safely, efficiently and in an environmentally sound manner. As such, FORS accreditation is frequently used by procurers of logistics services to provide assurance that the operator is managing its vehicles and drivers in line with the FORS standards and is often a requirement within contracts.

From 2 January 2025 the new version 7 becomes the required standard, building on the previous version 6 requirements. Included are changes such as:

- Emissions, fuel and air quality; this section is to be renamed 'Environmental impact'. Additional requirements include calculating well to wheel fleet emissions annually, diesel to AdBlue ratio and carrying out basic due diligence to ensure any low carbon fuels used are reputably sourced.
- Vehicle fleet; changes encourage transition to lower environmental impact vehicles.
- Serviceability and roadworthiness; aligning the standard with the Guide to Maintaining Roadworthiness on areas such as safety recalls and technician competence.
- Driver licensing; aligning with the Traffic Commissioner requirements advising checks every three months and increasing check frequency for high risk drivers.
- Professional development; requires driver elearning to be completed at induction and removal of the 10 per cent tolerance for the number of drivers that haven't undertaken FORS Professional Development.
- Working time and drivers' hours; addition of frequency for tacho downloads (vehicle unit and driver card) and managing missing mileage.

## 1 February 2025

### **Vehicle Certification Agency (VCA) – Full GB Type Approval Scheme**

All goods vehicles and trailers require 'Type Approval' to ensure they are built consistently and meet relevant legislation. After exiting the EU, EU type approval legislation was retained in the UK to create two approval regimes in the UK:

- The *UK (NI) Scheme* type approval follows EU law in line with the Windsor Framework.

- The *GB Scheme* type approval retained EU legislation as of 31st December 2020 and was called the *provisional GB type approval scheme*. A new GB law implemented the *full GB type approval scheme*. Goods vehicles, buses and cars were included in July 2023. This date affects:

- O3 box trailers (3.5t < 10t MAM).
- O4 box trailers (> 10t MAM).

It applies to new type approvals (beyond this date) and existing ones which have expired or do not have a provisional GB type approval. VCA are the UK type approval authority and can issue certificates under both schemes.

## 1 April 2025

### **Vehicle Excise Duty**

In the 2022, HM Treasury announced plans to introduce vehicle excise duty (VED) from April 2025 for electric vehicles, including cars, vans and motorcycles.

Guidance has been updated and from 1 April 2025 drivers of electric and low emission cars, vans and motorcycles will need to pay vehicle tax in the same way as drivers of internal combustion engine (ICE) vehicles.

This change will apply to both new and existing vehicles. Currently electric vehicles are exempt from VED if the electricity comes from:

- An external source, such as a private or public chargepoint.
- An electric storage battery not connected to any source of power when the vehicle is moving.
- Hydrogen fuel cells.

Most electric vans will move to the standard annual rate for light goods vehicles, which this year is set at £335 per annum (if paid in a single payment). Below is a summary of the main changes.

Vehicle type	Yearly VED from 1 April 2025 (subject to change)
Electric and low emission cars (registered on or after 1 April 17 – on)	£190
Electric and low emission cars (registered after 1 March 01 – 31 March 17)	£20
Hybrid and alternatively fuelled vehicles (registered on or after 1 April 17 – on)	£190
Hybrid and alternatively fuelled vehicles (registered before 1 April 17)	Depends on CO <sub>2</sub> emissions
Electric vans (Most vans, some exceptions for Euro 4/5)	£335

Note that electric buses and heavy goods vehicles (exceeding 3.5t maximum authorised mass) are not affected by this change. They continue to be exempt from paying vehicle tax and there are currently no plans to introduce this change for larger vehicles.

For more information on all the changes visit [www.nidirect.gov.uk](http://www.nidirect.gov.uk).

## May 2025

### **Guide to Maintaining Roadworthiness**

The Guide to Maintaining Roadworthiness (GTMR) is a Department for Infrastructure publication produced by the Driver and Vehicle Agency. It provides recommended systems and requirements for maintaining the roadworthiness of vehicles including advice on inspections, facilities, quality monitoring and responsibilities.

Seen as the industry benchmark, the last update was in May 2023 and DVA are planning to review the guide but can't give us a timescale because they have other competing priorities and resource pressures.

The most significant piece not currently included is information on maintaining Advanced Driver Assistance Systems (ADAS) which operators will be finding on their newer vehicles. DVA have said they will consider ADAS at the next update and Logistics UK will continue to work with DVA to support the next review.

## 21 May 2025

### **Light commercial vehicles used for international transport**

In May 2022, light commercial vehicles (LCVs) between 2.5t and 3.5t maximum authorised mass, used for hire and reward on international journeys fell into scope of operator licencing. To do this required a transport manager to be appointed and there were three options to fulfil this:

- Employ someone with a TM CPC qualification.
- Employ the services of a third party external transport manager.
- Have an existing member of staff temporarily recognised as a transport manager.

After 21 May next year the grace period for this third option to use an existing member of staff ends. This means they must have passed a transport manager CPC qualification by this date to continue being a recognised transport manager, or

operators must employ one of the other options to remain compliant.

## 1 July 2025

### **'Not for EU' labelling expanded**

From 1 July 2025, under the Northern Ireland Retail Movement Scheme (NIRMS), all retail goods (other than goods sold loose) should be individually labelled. Composite products like fruit, vegetables and fish moving to Northern Ireland under NIRMS will also need to be individually labelled.

Not all products moved under the Northern Ireland Retail Movement Scheme need to be individually labelled and there are exceptions. If products are individually labelled, you will not need to label the box, nor provide appropriate signage. Another exception are products not subjected to EU official controls such as confectionary, chocolate, pasta, biscuits, coffee etc.

Note also at this time, in line with requirements under the Windsor Framework, final Sanitary and Phytosanitary inspection/Border Control Post facilities are expected to be in place in Northern Ireland.

## 19 August 2025

### **Smart tachograph 2 – retrofit**

The requirements of *Regulation (EU) No 165/2014* provides a timeline for implementation of smart tachograph 2 and this is another milestone. UK vehicles currently equipped with smart tachograph 1 devices crossing borders on international journeys need to be retrofitted with smart tachograph 2 devices from no later than 19 August 2025.

This final step within these regulations confirms that all UK vehicles fitted with tachograph, carrying out international journeys, will have to be fitted with smart tachograph 2.

Please contact the Logistics UK Member Advice Centre for clarification on any of the topics summarised above:

0370 605 0000\* – [MAC@logistics.org.uk](mailto:MAC@logistics.org.uk)