

CUSTOMS REGISTRATION, LICENSING AND ACCREDITATION FAQs – April 2020

1.	<p>Q: When will the new Customs Registration, Licensing and Accreditation (RLA) Release begin?</p> <p>A: The system was implemented on 20 April 2020 but will only be operationalised when the amended rules are published on 24 April 2020.</p>						
2.	<p>Q: What is the main focus of the rollout on 20 April 2020?</p> <p>A: The main focus of the rollout on 20 April will be the introduction of eFiling as a channel for submission of new registration and licensing applications. This ensures that services continue to be available during the lockdown period in order to minimise face-to-face contact.</p>						
3.	<p>Q: When can traders start to submit applications?</p> <p>A: Traders can submit applications as of 20 April, but your outcome will be held back until 24 April.</p>						
4.	<p>Q: Who would be allowed to register and license during the first phase of RLA?</p> <p>A: This first phase of implementation focuses on new applications for 45 client types only, which can be viewed below:</p>						
	Client Type		Client Type		Client Type		Client Type
1	Transit Shed Operator	12	Own Goods Carrier: Air Cargo	23	Exporter for SADC (local)	34	Exporter for GSP - Norway (local)
2	De-grouping Depot Operator	13	Own Goods Carrier: Rail Cargo	24	Exporter for SADC-EPA (local)	35	Exporter for GSP - Russia (local)
3	Container Depot	14	Own Goods Carrier: Road Cargo	25	Exporter for - SACU/EFTA (local)	36	Exporter for GSP - Turkey (local)
4	Air Cargo Carrier (local)	15	Own Goods Carrier: Sea Cargo	26	Exporter - SADC (non-local)	37	Exporter GSP - AGOA (non-local)
5	Air Cargo Carrier (non-local)	16	Sea Carrier (local)	27	Exporter - SADC EPA (non-local)	38	Exporter GSP - Norway (non-local)
6	Rail Cargo Carrier (local)	17	Sea Carrier (non-local)	28	Exporter for - SACU/EFTA (non-local)	39	Exporter GSP - Russia (non-local)
7	Rail Cargo Carrier (non-local)	18	Clearing Agent	29	Approved Exporter - SADC EPA (local)	40	Exporter GSP - Turkey (non-local)
8	Remover of goods in Bond by road (Local)	19	Importer (local)	30	Approved Exporter - SACU/EFTA (local)	41	Registered agent: Importers (non-local)

	9	Remover of goods in Bond by road (non-local)	20	Importer (non-local)	31	Approved Exporter - SADC EPA (Non-local)	42	Registered agent: Exporters (non-local)
	10	Road Cargo Carrier (local)	21	Exporter (local)	32	Approved Exporter - SACU/EFTA (non-local)	43	Registered agent: Carriers (non-local)
	11	Road Cargo Carrier (non-local)	22	Exporter (non-local)	33	Exporter for GSP - AGOA (local)	44	Exporter for - SACU/MERCOSUR (local)
							45	Exporter for - SACU/MERCOSUR (non-Local)

5.	Q: It appears that the new system only caters for Customs registrations/licensing? A: Yes, that is correct. Excise applications are not included in this Implementation.
6.	Q: Will the other client types still be able to register/ license? A: Remaining client types will be required to follow the current process of registration/licensing by visiting a Customs branch office (after the lockdown).
7.	Q: What is the process to be followed by client types that do not form part of Release 1? A: The client will need to hand in the required supporting documents depending on the client type applied for and DA 185 application with Annexures. <ul style="list-style-type: none"> Supporting documents requested must be consistent and requested accordingly, deviations from these delay licensing and registration processes. Further information regarding Registration and Licensing is available at:- https://www.sars.gov.za/ClientSegments/Customs-Excise/Registration-and-Licensing/Pages/default.aspx For the current Cargo Reporter application process that remains manual, the DA185/DA 8 will be mandatory, as it is today. However for applications made on the RLA system, the DA185/DA 8 are not mandatory. The clients can use the DA185/DA 8 as a guide for submission of information.
8.	Q: What is the process to be followed for Cargo Reporters that want to register under the current lockdown procedure? A: Customs clients who wish to register as a cargo reporter, instead of couriering their registration documents or handing them in at SARS head office in Pretoria, they are asked to scan them and mail them to NLegodi@sars.gov.za . For queries, you can call 012-422 8388.
9.	Q: Where is the application form DA 185 available? A: https://www.sars.gov.za/ClientSegments/Customs-Excise/Registration-and-Licensing/Pages/default.aspx
10.	Q: The initial plan was to roll out the RLA Release port by port? A: Yes this was the initial plan, now the system will be available to trade from both an eFiling online channel as well as a Branch Front And (BFE) walk in channel at all Customs branches where applications can be submitted.
11.	Q: What does SARS want to achieve through the new RLA process? A: The objectives of the new RLA system include the following: <ul style="list-style-type: none"> Facilitate and enable legitimate trade Streamline and shorten turnaround times Create multiple channels for clients to add to and manage their subscriptions Introduce case-based management and workflows to manual processes

	<ul style="list-style-type: none"> • Screening of applications in terms of identified risk criteria • Auto finalisation of cases • Automated notifications • Available dashboard statuses for client and contact centre feedback
12	<p>Q: What will the new RLA System be capable of?</p> <p>A: The following capabilities are present:-</p> <ul style="list-style-type: none"> • Web-based electronic channel via eFiling or Branch Front End (BFE); • Electronically captured applications and supporting documents uploaded to the application • No paper documents required in respect of the 45 client types identified within Release 1; • System validations to improve accuracy of data submitted; • Intuitive based application form generated based on the client type selected and information captured in the application; • Pre-population capability on subsequent applications or selection from the library; • Automated notifications for selected correspondence in the first releases and thereafter incrementally released; • Dashboard available to clients to view their registration profile and initiate new actions against their profile; • Configuration matrix allows for continual configuration against client type characteristics; • Partially automated tax compliance check across all tax products for outstanding returns and overdue debt; • Parallel verification process of bank details without impacting RLA application Turnaround Time (TAT); • Management Reporting Dashboard capability to view and manage application process, including TAT management; • Automated processing of applications based on available verified system information; and • Relationship Management - allowing clients with issued Customs codes to disclose relationships for transactional processing.
13	<p>Q: Will the BFE walk in channel be available at all Customs branches?</p> <p>A: Although it will be available in branches, traders have been urged to only use eFiling during the lockdown period. However, they can make an appointment under exceptional circumstances (as per lockdown rules).</p>
14	<p>Q: What is the process to be followed at BFE?</p> <p>A: Service agent at BFE will capture applications on RLA (including signature pad or confirmation of submission letter and scan to case)</p>
15	<p>Q: Under which circumstances would a new Bond be required?</p> <p>A: A new Bond from a financial institution is required in the following cases:-</p> <ul style="list-style-type: none"> • Change in the name of a company; • Change in legal identity of a company; • Mergers of companies; • Takeovers of companies. <p>Since there are regular policy amendments, it is advisable to consult the SARS website (www.sars.gov.za) for latest updates.</p>
16	<p>Q: Would I be able to check up on the status of my application?</p> <p>A: A client will receive an email or SMS notifying him/her to log in to the RLA system on eFiling to view the progress of their application on the RLA Dashboard.</p>
17	<p>Q: What should a representative provide to a Customs service agent?</p> <p>A: To enable the officer to authenticate the applicant / representative in person, the following documents must be provided:</p> <ul style="list-style-type: none"> • Original identity document, driver's licence or passport or a temporary identity document/ passport of the applicant/representative; or

	<ul style="list-style-type: none"> • Original resolution/authorisation specifying who is authorised to act on behalf of the applicant (Company, Trust, Close Corporation, etc.) if applicable (this is per incident as the system does not store the Letter of Authority for future submissions); • The representative must have the letter of authority signed by the Directors giving such authority and this is different to the resolution; • Furthermore, the representative must bring in a certified copy of their ID together with the letters from Directors.
18	<p>Q: What is Legal Entity Registration (LER)?</p> <p>A: For a first-time SARS client, a face-to-face validation needs to take place at a SARS office. All required supporting documents must be presented and validated.</p>
19	<p>Q: Where will LER take place?</p> <p>A: Legal entity registrations (LER) will take place at your local or nearest SARS Office.</p>
20	<p>Q: May I send a representative to submit my application to BFE?</p> <p>A: Clients wishing to submit applications at BFE using a representative (driver/runner) must ensure that he/she has a mandate duly authorising such actions and such representative will be authenticated and may need to perform legal entity registration.</p> <p>A letter of authority is required when the applicant sends a representative for the authentication process (representative to also bring in a certified copy of their identification document)</p>
21	<p>Q: What will the turnaround time be for applications to be approved?</p> <p>A: As this is a new system, processing time has not been established. TAT and compliance to the SARS Service Charter will be assessed after implementation.</p>
22	<p>Q: What is the impact on trade regarding the new RLA?</p> <p>A: For the first time, trade will have dual applications channels – the process allows for clients to make submissions either via the RLA system (eFiling or BFE) for pre-defined client types or via the current manual process for other client types</p>
23	<p>Q: It is believed that the manual process is much quicker.</p> <p>A: The impact on trade of the new system will be:-</p> <ul style="list-style-type: none"> • Longer queuing time for BFE applications; • Scheduled application submission times as deemed necessary by Branch Management; • Legal Entity Registration (LER) / authentication at BFE; • Service agent to capture applications on behalf of Trader on RLA instead of Trader merely handing in the application form as before; • Renewal of licences as per Schedule 8 to continue as is (submit DA185)
24	<p>Q: What documents are needed for a Customs client applying as a non-local exporter?</p> <p>A: The mandatory supporting documents relevant to the Customs client applying as a non-local Exporter are as follows:-</p> <p>Original or certified copies of the following documents:</p> <ul style="list-style-type: none"> • Agency contract between applicant and agent (with an established place of business in the RSA) • VAT letters from SARS to confirm revenue registration details (if applicable) • Proof of company registration from the relevant competent authority in the foreign country • Identity document or passport • Court order in the case of an emancipated minor • Any other information as the Commissioner for SARS may require
25	<p>Q: May foreign banks provide surety?</p> <p>A: Foreign registered banks are not allowed to stand surety.</p>
26	<p>Q: Is there a pre-condition for online registration and licensing?</p>

	A: Yes, clients wanting to submit RLA applications MUST as a pre-condition be registered for a SARS Tax product prior to making use of the online eFiling platform for such applications.
27	Q: Is there any channel available that will cater for urgent requests for importers and exporters? A: Yes, urgent applications to register as importers/exporters during the COVID-19 lockdown will continue to follow the OSC process: Clients to submit applications for import/export via email to BMvubu@sars.gov.za / NMotete@sars.gov.za / avandermescht@sars.gov.za
28	Q: Will the Customs Ops Support Centre (OSC) be available to address pertinent questions which cannot be addressed by the local Customs RLA Champions? A: Yes, The OSC's primary responsibility is to provide answers and resolutions that the local Customs RLA Champions cannot resolve. (osc@sars.gov.za).
29	Q: How will SARS communicate the approval of applications for RLA? A: Clients will receive notifications and SARS correspondence. If they applied via eFiling, this can be accessed by logging in on their eFiling platform.
30	Q May I apply via eFiling if I have not registered for any tax products? A: No. Only if the client is a legal entity can they apply by way of eFiling i.e. they need to be registered for a SARS Tax product e.g. Income Tax and authenticated prior to submission
31	Q: How do I access and register for eFiling? A: In order to access and register on the eFiling platform, the client will need to visit the SARS website www.sars.gov.za – <i>How to register for eFiling</i> The client is then able to register for eFiling and complete the required fields in accordance with the eFiling user guide: https://www.sars.gov.za/AllDocs/OpsDocs/Guides/GEN-ELEC-18-G01%20-%20How%20to%20Register%20for%20eFiling%20and%20Manage%20Your%20User%20Profile%20-%20External%20Guide.pdf
32	Q: What does a client do when he wants to make use of eFiling? A: Already an eFiler – log on using existing ID and Password Not yet an eFiler – register on eFiling as a new user.
33	Q: Must foreigners/non-locals have an SA bank account/3rd party SA Bank Account to declare? A: Non-Locals (foreigners) must have an SA bank account/ 3rd party SA Bank Account to declare (this was not mandatory previously)
34	Q: What do clients do that already have a customs code and are not on the RLA client type list? A: Submit the DA 185, annexures and required supporting documents as before.
35	Q: How big may supporting documents be that are submitted via eFiling? A: Supporting documents submitted via eFiling cannot exceed 5 MB.
36	Q: In what format should documents be uploaded? A: The uploading of supporting documents must be in a PDF format.
37	Q: When will the eFiling profile be activated? A: The eFiling profile will only be activated once the client has been authenticated.
38	Q: Will an application with supporting documents be processed immediately? A: An application with supporting documents will automatically be submitted to back office for processing
39	Q: May a client apply for multiple client types at once? A: A client will have to be registered as one client type first before applying for the next e.g. apply for importer and once approved they can apply for exporter and other client types concurrently.
40	Q: When do you have to submit supporting documents? A: Supporting documents will have to be submitted upon new applications and when existing information has changed.
41	Q: What is the criteria in relation to a client's bank details? A: Bank Account details:

	<ul style="list-style-type: none"> • The user must provide SARS with their banking details. This information enables both SARS and the client to effect payments due. • It is important to note that only a valid South African bank account is acceptable for both local and non-local applicants. • The user must click the “Add Bank Account” button in order to capture the banking details.
42	<p>Q: There are three (3) categories reflected on the RLA dashboard. What are these?</p> <p>A: Each category displays the following:</p> <ul style="list-style-type: none"> • <u>Application Grid</u> – displays all applications captured by the user with statuses such as: draft, in progress, etc. • <u>Product Details Grid</u> – displays the client’s Product information e.g. Customs. • <u>Registered Client Types Grid</u> – displays all the registered and /or licensed client types. These will also include previously active client types which are now cancelled.
43	<p>Q: What is the impact if the correct roles are not allocated for RLA via eFiling?</p> <p>A: If the correct role allocation is not executed by your internal eFiling administrator, it would impact the user’s ability to achieve the desired outcome e.g. If a user wants to submit an application on RLA for the first time and the user is allocated the “RLA Manage Client Type” and not the “RLA Manage Customs Product”, then the user will not be able to submit the first application on RLA, impacting on the client’s ability to trade across borders (no Customs code will be granted).</p> <p>Therefore the following must be noted:</p> <ul style="list-style-type: none"> • The user (your internal eFiling administrator) will be allowed to select only ONE of the following user roles: <ul style="list-style-type: none"> • RLA View Customs Product • RLA View Client Type • RLA Manage Customs Product (This role allows full submission rights) • RLA Manage Client Type • Note the description of each of the roles, as not all roles allow submission of applications on RLA: <ul style="list-style-type: none"> • RLA View role – only view access and no submission capabilities; • RLA Manage role allows submission capabilities.
44	<p>Q: What is the objective of Relationship Management?</p> <p>A: To provide the trader with a secure online solution to manage their trading relationships, allowing SARS to efficiently and effectively facilitate relationship management amongst traders without direct involvement in the management thereof. This includes the ability for traders to create Client Type to Client Type relationships via a secure platform.</p>
45	<p>Q: Will all registrants and licensees need to re-register and if so what are the timeframes?</p> <p>A: The intent for existing clients to re-register/update their current registration information for their respective client types under the provisions of the Customs and Excise Act of 1964 remains an Operational prerogative, ie. based on the operating environment, Customs Operations may within the provisions of the Act request existing clients to update their current registration information. However, there is currently no timeframe as to when this may transpire. When the new Customs Control Act (CCA) is operationalised, the intent still remains for all existing clients to register under the provisions of the CCA.</p>
46	<p>Q: As we also offer customs consulting as a service, will we be logging onto our own eFiling to register our new clients with SARS or will they have to register for eFiling for us to log into their profile so we can assist them with registration? I just need clarity on what process Customs Consultants will follow.</p> <p>A: 1. Only a duly authorised director or manager or the authorised officer of the company may apply for registration, if the entity is a company.</p> <p>2. A clearing agent or registered agent may not apply for registration on behalf of an applicant, in other words, the application must be that of the applicant, signed by the applicant.</p> <p>3. Any person, duly authorised, may however submit an application to customs, whether through eFiling or manually.</p>

	4. Only a person registered in terms of section 59A as an electronic user may submit applications electronically as a clearing agent, registered agent or other representative on behalf of another.
47	Q: Must clients be registered for EDI (electronic communication) with SARS Customs? A: RLA is not dependent on EDI registration for application submission, but the client is required to register for eFiling in order to submit applications.
48	Q: In order to amend any customs information of a client, can only the relevant new documents be uploaded on the system or must a new DA185 application with all the usual documents be uploaded (even if those specific details are not changing)? A: Any amendment once the client type is registered on RLA will only be done electronically and no DA 185 will be required for this submission.
49	Q: Kindly advise whether we should be registering for anything on RLA as normal suppliers to overseas customers. We do have a customs number and use eFiling for our VAT and PAYE returns. We make use of transport agents to do the transport so are not directly involved in the shipping of the actual goods. A: If you are currently registered and active for a specific client type under the Customs and Excise Act of 1964, there is no need for you to re-register for the same client type under the new system. However, SARS does reserve the right to call upon you to update your information as deemed necessary within the provisions of the Act. However, the onus is upon you to ensure that you are registered for the appropriate client type in order to transact with Customs and Excise.
50	Q: With the implementation of the new RLA system, what action must existing clients take? A: The intent of the rollout is for clients to submit registrations for client types they are not currently registered with SARS Customs. If a client is currently registered with Customs for a specific client type, there is no need to re-register this client type on RLA.
51	Q: Please advise whether the RLA rollout is for new registrations at customs? Not for existing customs number holders? A: This rollout allows for traders who wish to register for a Customs client type (in line with the list of 45 client types) that they are currently not registered for with a Customs code. This therefore applies to existing traders with Customs Codes and new Traders who do not have a Customs code. eg. If an existing trader (who has a Customs code/Customs number) is licensed as a Storage warehouse client type but does not have a registration as an Importer client type, then this client (who has a Customs code already) must then apply for the registration of the importer client type as a new application.
52	Q: What do I do when I receive the following message on RLA: "We are busy enrolling you into RLA"? A: In the event that this message is displayed, please consider the following: <ul style="list-style-type: none"> a. If you have registered on eFiling on the day that this message is displayed, kindly be advised that the enrolment is not real-time. You should then attempt accessing RLA via eFiling the following day. b. If you have registered on eFiling at least one day prior to this message being received, please call the SARS Contact Centre on 0800 00 7277.

For more FAQs, which were posted on the webpage after the RLA roadshows in 2019, click here:
<https://www.sars.gov.za/AllDocs/Documents/customsandexcise/RLA%20Trader%20questions%2020190805.pdf>

DISCLAIMER

The information contained in this document is intended as guidance only and is not considered to be a legal reference, nor is it a binding ruling. The information does not take the place of legislation and readers

who are in doubt regarding any aspect of the information displayed in the leaflet should refer to the relevant legislation, or seek a formal opinion from a suitably qualified individual.