

RCG FREQUENTLY ASKED QUESTIONS (FAQ's)

1. WHAT DOES RCG STAND FOR AND WHERE DOES IT FIT IN?

RCG is an acronym for Reporting of Conveyances and Goods and it is one of the three major projects (the other two being Registration, Licensing and Accreditation (RLA) and Declaration Processing (DPS)) being undertaken under the New Customs Act Programme (NCAP) which is charged with operationalising the Customs Control Act, 2014 and the Customs Duty Act, 2014.

2. WHAT DOES CPS STAND FOR?

CPS is an acronym for the "Cargo Processing System" that will be implemented under the RCG project.

3. UNDER WHAT LEGISLATION WILL THE FIRST PHASE OF THE RCG IMPLEMENTATION TAKE PLACE?

The rules to section 8 of the Customs and Excise Act No.91 of 1964 have been amended to form the legislative basis for the implementation of RCG. These rules were published on 20 April 2018 in Government Gazette No. 41577, Notice R.429.

4. WHAT IS THE RATIONALE FOR IMPLEMENTING RCG BEFORE THE REGISTRATION, LICENSING AND ACCREDITATION (RLA) COMPONENT OF THE NEW CUSTOMS ACT PROGRAMME (NCAP)?

SARS has reconsidered its initial approach of introducing Registration, Licensing and Accreditation (RLA) as a first step and will instead be focusing on Reporting of Conveyancing and Goods (RCG). This builds on the platform created by the new Manifest Processing System (MPR) which was introduced on 16 June 2016.

5. WHEN WAS RCG IMPLEMENTED?

SARS has implemented the first phase of RCG on 20 April 2018.

6. IS THERE ANY GUIDE THAT WILL ASSIST ME WITH UNDERSTANDING THE CONCEPT OF "RCG"?

Yes, click on link below and select "RCG User Implementation Guide"

<http://www.sars.gov.za/ClientSegments/Customs-Excise/AboutCustoms/Pages/Reporting-of-Conveyances-and-Goods.aspx>

7. MUST I ALSO SUBMIT REPORTS ON DOMESTIC CARGO MOVEMENTS?

No, reports are only required to be submitted in respect of cargo carried on foreign-going vessels and aircraft, cross-border trains and trucks crossing land border posts and all such cargo loaded, off-loaded, packed, unpacked, consolidated, de-grouped, received at or removed from temporary storage facilities (e.g. terminals, container depots, transit sheds and de-grouping depots).

8. MUST I REGISTER TO SUBMIT CARGO REPORTS TO SARS?

Yes, any person required in terms of these rules to submit a reporting document must, notwithstanding being registered or licensed under any other provision of the Act, apply for registration as a person submitting reports on the applicable form DA 8 and annexure.

9. WHERE CAN I DOWNLOAD THE NEW REGISTRATION FORMS FOR RCG?

The DA 8 Forms to be used for registration as a cargo reporter are divided per modality and reporter type and are available on the RCG webpage.

10. WHO MUST USE WHICH FORMS FOR REGISTRATION?

The RCG registration forms are divided into modality and reporter type.

Forms DA8, DA8A, DA8B and DA8C must be completed by an applicant together with the applicable Annexure.

Sea Cargo	
Form	Use
DA8	To be completed by applicant
DA 8.01	To be completed by Carriers / Registered Agents / Clearing Agents <ul style="list-style-type: none">• Local carriers; or• Registered agents on behalf of foreign Carriers not located in the Republic• Clearing agents / Agents on behalf of foreign Freight Forwarders / NVOCC's
DA 8.02	To be completed by Port Authorities.
DA 8.03	To be completed by Container Terminal Operators and Wharf Operators.
DA 8.04	To be completed by Container Depot Licensees

Air Cargo	
Form	Use
DA8A	To be completed by applicant
DA 8A.01	To be completed by Carriers / Registered Agents / Clearing Agents <ul style="list-style-type: none"> • Local carriers; or • Registered agents on behalf of foreign Carriers not located in the Republic • Clearing agents / Agents on behalf of foreign Freight Forwarders / NVOCC's
DA 8A.02	To be completed by Port Authorities.
DA 8A.03	To be completed by Transit Shed Operators
DA 8A.04	To be completed by De-grouping Depot Licensees

Rail Cargo	
Form	Use
DA8B	To be completed by applicant
DA 8B.01	To be completed by Carriers / Registered Agents / Clearing Agents <ul style="list-style-type: none"> • Local carriers; or • Registered agents on behalf of foreign Carriers not located in the Republic
DA 8B.02	To be completed by Railway Authorities.

Road Cargo	
Form	Use
DA8	To be completed by applicant
DA 8C.02	To be completed by Carriers / Registered Agents / Clearing Agents <ul style="list-style-type: none"> • Local carriers; or • Registered agents on behalf of foreign Carriers not located in the Republic

11. HOW DO I REGISTER AND SUBMIT REPORTS IF I AM A FOREIGN CARRIER NOT LOCATED IN THE REPUBLIC?

Foreign carriers must appoint a Registered Agent and provide him or her with a letter of appointment. That Registered Agent must then furnish that letter of appointment and register on the applicable forms DA 8 in order to be able to submit reports on behalf of the foreign carrier.

12. WHAT IS A REGISTERED AGENT?

A Registered Agent is a person located in the Republic that is registered in terms of section 59A of the Act to represent a foreign carrier not located in the Republic – i.e. on form DA 185.4A13.

A Registered Agent submitting a reporting document on behalf of a Carrier must also be registered as a person submitting reporting documents – i.e. on form DA 8.

13. HOW MUST I SUBMIT REPORTS TO SARS?

All prescribed reports must be submitted using Electronic Data Interchange (EDI). SARS currently uses UN/EDIFACT version UN D. 16A S4 for the communication of such messages.

Message Implementation Guidelines (MIG's) for all messages can be found on the RCG webpage.

14. MUST I REGISTER FOR PURPOSES OF ELECTRONIC COMMUNICATION?

Yes, registration is required to set up a user profile, to conclude an electronic user agreement and to create a digital signature. Details of the EDI registration process are available on the EDI webpage, see –

http://www.sars.gov.za/AllDocs/Documents/customsandexcise/SARS_EDI_User_Manual_v17_10_June_2016.pdf

15. I HAVE A TECHNICAL RELATED QUERY, WHO DO I CONTACT?

For EDI technical queries, please contact:

- **Carl Wilbers:**

E-mail Address- CWilbers@sars.gov.za

For EDI registration related queries, please contact:

- **Emelia Holtzhausen:**

E-mail Address- eholtzhausen@sars.gov.za

Telephone Number- 012 422 6981

16. WHAT IS THE PROCESS TO BE FOLLOWED TO REGISTER AS A CARGO REPORTER?

Registration is a two-step process:

- **First Registration:** must be registration as a Cargo Reporter on form DA 8 and applicable Annexure.
- **Second Registration:** must be registration for the purpose of electronic communication with SARS on form DA 185.4A6. This process is to be initiated **only after** having completed registration as a cargo reporter on a form DA8.

Persons with a current EDI profile (E.g. CUSDEC) must still apply for an EDI profile to submit cargo reports (E.g. CUSCAR, CALINF, COARRI, GOVGIO and COSTCO).

Note: Failure to adhere to the above may result in your cargo reports being rejected by the CPS system

All applications for registration as a Cargo Reporter must be:-

- Made in accordance with the requirements of the respective SARS policies, otherwise the applications will be rejected.
- Physically submitted or couriered for the attention to Mrs Nkhensane Legodi on the following address:

National Licensing and Registration – Customs and Excise Trader Registration (SARS Head Office)

Block D, Ground floor, Lehae La SARS,

299 Bronkhorst Street,

Nieuw Muckleneuk,

Pretoria

Telephone: (012) 422 8388

Email address: NLegodi@sars.gov.za

17. I HAVE A REGISTRATION RELATED QUERY, WHO DO I CONTACT?

For queries relating to registration as a cargo reporter on form DA 8, please contact:

Nkhensane Legodi:

E-mail Address- NLegodi@sars.gov.za

Telephone Number- 012 422 8388

For queries relating to EDI registration on form DA 185.4A6, please contact:

Emelia Holtzhausen:

E-mail Address- eholtzhausen@sars.gov.za

Telephone Number- 012 422 6981

18. WHAT OPTIONS DO I HAVE REGARDING THE SUBMISSION OF MY REPORT?

If you have the required technical capability, you can develop and submit your reports yourself using the relevant Message Implementation Guideline (MIG) published on the RCG webpage.

Alternatively you can –

- use commercially available products developed for this purpose by various Computer Bureau's (as intermediaries).
- If you are a foreign carrier: your cargo report can be submitted either by yourself or by your registered agent in the Republic on your behalf. Liability for submission remains with the registered agent in the Republic.
- If you are a freight forwarder (clearing agent): you must submit your cargo report directly to SARS, but in the case of an Advanced Loading Notice for Containerised goods (24 hour rule), this message may be sent directly from the overseas load port. Liability for submission remains with the local freight forwarder.
- If you are a local carrier or licensee of a temporary storage facility (e.g. terminal or depot), you must submit your reports either yourself, or make use of the services provided by an intermediary, as provided for in the rules for section 101A of the Customs and Excise Act, 1964.

19. ARE THE REPORTING REQUIREMENTS APPLICABLE TO ALL MODALITIES?

Yes, it covers the sea, air, road and rail modalities in respect of the movement of international cargo.

20. ARE THE REPORTING REQUIREMENTS FOR BOTH IMPORT AND EXPORT CARGO?

Yes, it applies to import cargo (including national transit, international transit and transshipment cargo movements) as well as cargo destined for export.

21. ARE THE REPORTING REQUIREMENTS APPLICABLE TO BOTH MASTER AND HOUSE BILL CARGO?

Yes, reports are required from both Carriers (master bills) and Freight Forwarders (house bills).

22. WHAT IS THE BASIC DIFFERENCE BETWEEN CARRIERS AND CLEARING AGENTS RELATING TO CARGO REPORTING?

Both Carriers and Clearing Agents are "Cargo Reporters". Carriers transport cargo (whether on their own vessels or under a slot-chartering or code-sharing arrangement), whilst Clearing Agents arrange for the transport of goods on behalf of other persons.

23. I SEE NO REFERENCES IN THE RULES TO FREIGHT FORWARDERS, NVOCC'S, GROUPAGE AGENTS, COURIERS, ETC?

Freight Forwarders, Non Vessel Owning/Operating Common Carriers (NVOCC's), Groupage Agents, Couriers, etc., are all parties who arrange the transport of goods for other persons for reward and, as such, predominantly fall within the definition of "Clearing Agent" in the Rules to Section 8 of the Act.

24. HOW AND WHEN MUST AMMENDMENTS TO REPORTS BE MADE?

Amendments to any report must be made if any information previously reported has subsequently changed, or any incorrect, incomplete or out-dated information was previously reported.

An amended reporting document must be submitted immediately when the person concerned becomes aware of the changed, incomplete, incorrect or out-dated information.

An amended reporting document must contain the original information as amended by the updated information and it replaces the original document.

25. IS THERE A DEADLINE FOR AMENDMENTS TO ADVANCED CONTAINERISED LOADING NOTICES (24 HOUR RULE)?

No deadline beyond what has been prescribed for amendments generally (see above) is currently imposed on Advanced Container Loading Notices.

26. CAN AN AIR CARRIER REPORT ON BEHALF OF A FREIGHT FORWARDER?

Yes, a Freight Forwarder can request a Carrier to submit his/her Advance Air Cargo Arrival Notices to SARS on a CUSCAR_HAB (House Air Waybill).

27. CAN A FREIGHT FORWARDER REPORT ON BEHALF OF AN AIR CARRIER?

No, it is not possible for any Freight Forwarder to submit the Carriers Advance Air Cargo Arrival Notices on a CUSCAR_FWB (Master Air Waybill) on behalf of a Carrier. Only a Registered Agent specifically appointed by a foreign Carrier for that purpose may do so.

28. MUST EXPORT AIR CARGO ALSO BE REPORTED?

Each cargo reporter responsible for cargo loaded on board a foreign-going aircraft for export must, within one working day after departure of the aircraft from a customs and excise airport to a destination outside the Republic, submit to the Commissioner an air cargo departure notice in respect of the cargo for which that cargo reporter is responsible.

29. HOW ARE COURIERS AFFECTED BY RCG REPORTS?

Couriers who have their own on-airport facilities are both Transit Shed Operators as well as Freight Forwarders (Clearing Agents) and, where they operate their own aircraft, also Carriers for RCG reporting purposes:

- As Transit Shed Operators they will be responsible to report the prescribed Outturn Reports in respect of that facility;
- As Freight Forwarders/Clearing Agents they will be responsible to report all their house air waybills;
- As Carriers they will be responsible to report the scheduled flights of their aircraft, as well as any master air waybills which they issue.

30. MUST A CARRIER ALSO REPORT THE ARRIVAL AND DEPARTURE OF HIS VESSEL OR AIRCRAFT?

No, whilst this has been the practice under MPR, the Rules under Section 8 now require Port Authorities in charge of sea ports and Customs and Excise airports to report the arrival and departure of foreign-going vessels and aircraft.

31. WHEN DOES A VESSEL, AIRCRAFT, CROSS-BORDER TRAIN AND TRUCK ARRIVE IN, OR DEPART FROM, THE REPUBLIC?

- A foreign-going vessel arrives at a port when the vessel, upon reaching the port, docks for the first time at that port, whether inside the port or at a docking facility outside the port. It departs from a port when the vessel undocks to move out of or away from the port.
- A foreign-going aircraft arrives at a customs and excise airport when the aircraft lands at the airport. It departs from a customs and excise airport when the aircraft takes off from the airport.
- A cross-border train or a railway carriage attached to a cross-border train arrives at a railway station when the train stops for the first time at a railway terminal at that railway station. It departs from a railway station when the train starts to move out of the railway station.
- A truck arrives in the Republic when the truck crosses the border into the Republic. It departs from the Republic when the truck crosses the border out of the Republic.

32. WHAT ARE OUTTURN REPORTS?

Outturn Reports is a collective term used to refer to a number of specific reports designed to track and control the movement of cargo throughout the supply chain. These range from discharge and

load reports to reports on the movement of cargo through terminal and depots gates, as well as reports of cargo unpacked or packed.

33. WHO MUST SUBMIT REPORTS TO SARS?

The detail of the reporting requirements can be found in the rules to section 8 of the Customs and Excise Act No.91 of 1964 and for a complete and accurate understanding of who must report what and by when; the legislation is the best and primary reference that should be consulted.

A basic breakdown is that Carriers, Registered Agents and Clearing Agents are responsible for Pre-loading or Pre-arrival Cargo Notices whilst a number of landside reports must be provided by Port Authorities, Container Terminal Operators, Wharf Operators, Licensees of Container Depots, Transit Shed Operators and Licensees of De-grouping Depots.

See table below for more detail –

Reports and reporting responsibility

Report Type	Name	Shipping Line (Carrier) / Registered Agent	Airline (Carrier) / Registered Agent	Road Carrier	Rail Carrier	Clearing Agent	Container Terminal / Transit Shed	Container Depot / De-grouping Depot	Port Authority	Airport Authority
CUSCAR – Customs Cargo Reports										
CUSCAR_ALM	Advance Loading Master (container)	X								
CUSCAR_ALH	Advance Loading House (container)	X				X				
CUSCAR_COM	Container Master	X								
CUSCAR_COH	Container House					X				
CUSCAR_BB	Bulk / Breakbulk	X								
CUSCAR_ECL	Empty Container List	X								

CUSCAR_FF M	Flight Forwarding Manifest		X							
CUSCAR_FW B	Air cargo reported on a Master Air Waybill		X							
CUSCAR_HA B	Air cargo reported on a House Air Waybill		X			X				
CUSCAR_RM A	Rail Manifest (Rail Consignme nt Note)				X					
CUSCAR_RF M	Road Freight Manifest			X						
CUSCAR_AN T	Advance Notice - Terminals						X			
CUSCAR_AN D	Advance Notice - Depots							X		
Report Type	Name	Shipping Line (Carrier) / Registere d Agent	Airline (Carrier) / Registere d Agent	Road Carrie r	Rail Carrie r	Clearin g Agent	Contain er Terminal / Transit Shed	Contain er Depot / De- grouping Depot	Port Authorit y	Airport Authorit y
CALINF - Schedule / Arrival Information										
CALINF_SCH	Sea Schedule	X								
CALINF_ARR	Sea Arrival								X	
CALINF_ASC	Air Schedule		X							
CALINF_ARR	Air Arrival									X
Report Type	Name	Shipping Line (Carrier) / Registered Agent	Airline (Carrier) / Registered Agent	Road Carrier	Rail Carrier	Clearing Agent	Container Terminal / Transit Shed	Container Depot / De- grouping Depot	Port Authority	Airport Authority

COARRI – Container Discharge / Loading Report

COARRI_98	Container Discharge						X			
COARRI_270	Container Load						X			
Report Type	Name	Shipping Line (Carrier) / Registered Agent	Airline (Carrier) / Registered Agent	Road Carrier	Rail Carrier	Clearing Agent	Container Terminal / Transit Shed	Container Depot / De-grouping Depot	Port Authority	Airport Authority

COSTCO – Outturn Report

COSTCO_DOR	Depot Cargo Outturn Report							X		
COSTCO_BBB	Bulk/Break Bulk/Cargo Outturn Report						X			
COSTCO_VOR	Vessel Outturn Report							X		
COSTCO_AOR	Air Cargo Outturn Report						X	X		
COSTCO_EOR	Air Excess Outturn Report						X	X		
COSTCO_ALD	Air Terminal Load / Discharge Report						X			
Report Type	Name	Shipping Line (Carrier) / Registered Agent	Airline (Carrier) / Registered Agent	Road Carrier	Rail Carrier	Clearing Agent	Container Terminal / Transit Shed	Container Depot / De-grouping Depot	Port Authority	Airport Authority

GOVGIO – Gate in / Gate out Report

GIO_TGO	Sea Gate Out Terminal						X			
GIO_TGI	Sea Gate In Terminal						X			
GIO_DGI	Sea Gate Out Depot							X		

GIO_DGO	Sea Gate In Depot							X		
GIO_DCI	Sea Depot Consignment Gate In							X		
GIO_ATI	Air Terminal Gate In						X			
GIO_ADI	Air Depot Gate In							X		
GIO_BGI	Sea Break / Bulk Terminal In						X			

34. WHAT IS A “FIRST-LEVEL” FREIGHT FORWARDER?

A “First-level Freight Forwarder” is the party who contracted directly with a Carrier for the transport of his/her cargo and is named as the “Consignee/Shipper” on the Ocean/Master bill of lading.

35. DOES THE CARRIER AND THE CLEARING AGENT REPORT ADVANCE CONTAINER LOADING NOTICES INDEPENDENTLY?

An Advance Loading Notice of Containerised Cargo submitted by a Carrier need not contain all the containerised cargo details of any specific consignment if the cargo reporter or other person who made the transport arrangements for that consignment with that carrier submits the excluded details in a separate notice to the Customs Authority.

This will give Clearing Agents two options:

- either to provide the house bill information to the Carrier to report, or
- To report this information on their own in a separate notice with permission from the Carrier.

Validation as to the permission referred to above will take place via relationships created in the Relationship Manager Module (RMM) to be delivered as part of the Registration, Licensing and Accreditation (RLA) project. As this module has not been delivered at the time of RCG phase one implementation, Freight Forwarders/Clearing Agents may send their Advance Loading Notices directly to SARS.

36. CAN A SEA CARRIER REPORT ON BEHALF OF A FREIGHT FORWARDER?

Yes, a first-level Freight Forwarder can request a Carrier to submit his/her Advance Containerised Loading Notice (CUSCAR_ALH) to SARS.

37. CAN A FREIGHT FORWARDER REPORT ON BEHALF OF A SEA CARRIER?

No, it is not possible for any Freight Forwarder to submit the Carriers Advance Containerised Loading Notice (CUSCAR_ALM) on behalf of a Carrier. Only a Registered Agent appointed by a foreign Carrier specifically for that purpose may do so.

38. MUST A SEA CARRIER (SHIPPING LINE) SUBMIT AN ADVANCE CONTAINERISED CARGO LOADING NOTICE, AS WELL AS AN ADVANCE SEA CARGO ARRIVAL NOTICE FOR THE SAME CONSIGNMENT?

No, only an Advance Containerised Loading Notice must be submitted.

39. MUST A FREIGHT FORWARDER SUBMIT AN ADVANCE CONTAINERISED CARGO LOADING NOTICE, AS WELL AS AN ADVANCE SEA CARGO ARRIVAL NOTICE FOR THE SAME CONSIGNMENT?

Freight Forwarders who contract directly with a Carrier for the transport of goods must submit an Advance Containerised Cargo Loading Notice. These Freight Forwarders are known as “first-level” freight forwarders.

Freight Forwarders who co-load with a NVOCC’s, another Freight Forwarder, or Groupage Agent need not submit an Advance Containerised Cargo Loading Notice but need only submit an Advance Sea Cargo Arrival Notice prior to arrival of the vessel at the first port where that vessel is scheduled to call after entering the Republic.

40. WHERE MUST AN ADVANCED CONTAINERISED LOADING NOTICE BE REPORTED IN RESPECT CARGO TRANSHIPPED AT A FOREIGN PORT?

Legislation requires an Advanced Containerised Loading Notice to be reported in respect of cargo loaded on board a vessel at a foreign port that will be on board that vessel when it enters the Republic.

For example: Container loaded on board vessel “A” at Port of Shanghai, transhipped at Singapore and placed on vessel “B” for a voyage to the Republic.

Container loading notice is required in respect of the container loaded on vessel “B”.

41. I AM A CARRIER THAT SLOT CHARTERS / CODE SHARE ON VESSELS AND AIRCRAFT TRANSPORTING CARGO TO THE REPUBLIC. MUST I SUBMIT ADVANCE VESSEL / AIRCRAFT ARRIVAL NOTICES TO SARS?

No, it is the responsibility of the Principal Carrier who operates the vessel or aircraft to submit that Advance Arrival notice to SARS.

42. ARE ADVANCE LOADING NOTICES REQUIRED FOR BREAK BULK AND BULK CARGO OR AIR CARGO?

No, it is only required in respect of containerised cargo

43. CAN A FREIGHT FORWARDER REPORT SEA BULK/ BREAK BULK CARGO?

For the first phase of RCG, only bulk/break bulk cargo reported by Carriers against Master Bills of Lading can be electronically processed.

House Bills of Lading in respect of bulk/break bulk cargo must be reported in paper format to local branch offices at this time.

44. IS THE REQUIREMENT FOR PRE-LOADING CONTAINERISED CARGO NOTICES APPLICABLE TO EMPTY CONTAINERS?

No, empty containers are reported on an Advance Sea Cargo Arrival Notice 96 hours (unless short sailing voyage) prior to the scheduled arrival of the vessel at the first port where the vessel is scheduled to call after entering the Republic.

45. HOW DOES SHORT VOYAGE DURATIONS INFLUENCE REPORTING TIMES?

If the duration of a voyage, calculated from the last place where cargo bound for the Republic were taken on board, is likely to be more than 96 hours – then the reporting period is 96 hours before the scheduled arrival of the vessel at the first port where the vessel is scheduled to call after entering the Republic.

If the duration of that voyage is likely to be less than 96 hours – then the reporting period is 6 hours before the arrival of the vessel at that port

46. ARE ADVANCED LOADING NOTICES APPLICABLE TO EXPORT CARGO?

No, Advanced Loading Notices are only applicable to containerised import cargo.

47. HOW IS EXPORT CARGO REPORTED IN THE SEA MODALITY?

Each cargo reporter responsible for cargo loaded on board a foreign-going vessel operated by a Carrier for export must, within three working days after the departure of the vessel from a port to a destination outside the Republic, submit to the Commissioner a Sea Cargo Departure Notice in respect of the cargo for which that Cargo Reporter is responsible.

48. WILL SARS SEND LOADING INSTRUCTIONS TO THE CARRIER?

For the first phase of RCG, SARS will not transmit “load/do not load” messages in respect of Advanced Loading Notices for Containerised goods (24 hour rule).

49. MUST FREIGHT REMAINING ON BOARD BE REPORTED?

Freight Remaining On Board (FROB) is not reportable in the first phase of RCG which currently deals with cargo off-loaded at sea ports in the Republic.

50. WHAT IS AN ADVANCE NOTICE TO DEPOTS?

It is an abbreviated message that is based on Advance Cargo Notices received by SARS, but stripped of all consignor/consignee data, which is sent to licensees of Container Depots and licensees of De-grouping Depots to enable those parties to timeously complete the Outturn Reports that they must submit to SARS in respect of the cargo received at their premises.

51. WHAT IS A ROAD CARRIER?

A Road Carrier is a person carrying on business by transporting goods by truck for reward.

52. I AM A FOREIGN ROAD CARRIER NOT BASED IN SOUTH AFRICA, WHAT MUST I DO?

You must appoint a Registered Agent in the Republic who must then register on form DA8 for the purpose of submitting electronic Road Freight Manifests on your behalf.

53. WHAT IS A ROAD WAYBILL?

A Road Waybill is a document issued by a Road Carrier to transport, or to arrange the transport of, goods to a particular destination on board a truck, and which serves as proof that the carrier or that person has received the goods and has undertaken to transport, or to arrange the transport of, the goods on the terms and conditions stated or referred to in the document.

54. WHAT IS THE IMPACT OF RCG ON ROAD CARRIERS?

All Road Carriers who are to cross a South African land border post with cargo on a truck must register as Road Carriers for purposes of reporting and must submit their Advance Truck, Crew and Cargo Notices electronically to SARS

55. HOW WILL ALL THESE CHANGES AFFECT THE ROAD MODALITY?

The road modality, with the exception of a few small changes to the electronic Advance Truck, Crew and Cargo Arrival Notice, remains largely untouched for compliant Road Carriers who currently submit electronic Road Freight Manifests to SARS, due to the fact that most of the changes required by the Customs Control Act, 2014 has already been introduced under the previous MPR implementation.

The changes that will be implemented are, an –

- increase from 5 to 10 repeats for Crew / Passenger / Driver details; and
- Increase from 10 to 35 characters for container seal number

56. IS THE SUBMISSION OF AN ADVANCE TRUCK, CREW AND CARGO NOTICE MANDATORY?

Yes, the only exemption provided is for own goods carriers who do not submit declarations electronically in terms of section 101A(2)(d) read with rule 101A.01A(2)(a)(v)(bb).

57. WHO MUST SUBMIT THE ROAD FREIGHT MANIFEST?

The Road Carrier whose truck is to cross a South African Land Border Post with cargo is liable for the submission of an Advance Truck, Crew and Cargo Notice in respect of that truck, its crew and all the cargo carried thereon.

58. WHAT IS THE IMPACT IF I HIRE ADDITIONAL TRUCKS OR DRIVERS?

The transport equipment (i.e. whether self-owned, hired, leased, etc.) utilised by a Road Carrier do not impact the reporting responsibility of that Road Carrier as explained above.

59. WHAT HAPPENS IF I USE A SUB-CONTRACTOR?

All Road Carriers who is to cross a Land Border Post, irrespective of whether acting in a principal or a sub-contractor role in respect of any particular haulage, is required to submit an Advance Truck, Crew and Cargo Notice to SARS prior to arriving at the Land Border Post.

60. WHAT ARE THE TIME PERIODS FOR SUBMITTING ADVANCE TRUCK, CREW AND CARGO NOTICES?

- Advance Truck, Crew and Cargo Arrival Notices must be submitted to SARS before the arrival of the truck at the Land Border Post where it will enter the Republic.
- Advance Truck, Crew and Cargo Departure Notices must be submitted to SARS at least one (1) hour before the truck reaches the Land Border Post where it will leave the Republic

61. CAN THERE BE MULTIPLE MANIFESTS IN RESPECT OF A SINGLE TRUCK (E.G. COMPILED BY TRANSPORT BROKERS OR CLEARING AGENTS)?

No. Irrespective of the underlying commercial arrangements, cargo type (e.g. straight or consolidated), contractual arrangements or broker activities, for cargo reporting purposes to SARS there shall be only one manifest for a truck which must be compiled by the Road Carrier who is to carry the goods across a Land Border Post on that truck.

62. WHAT HAPPENS IF SOME OF THE DATA ON AN ELECTRONIC ROAD MANIFEST CHANGES?

- Where a change occurs to any data on an Advance Truck, Crew and Cargo Notice previously submitted to the CPS system (e.g. truck registration number changes), the Road Carrier must amend the Notice and re-submit it to the CPS system prior to the arrival of the truck at the land border post.
- No amendments to the Advance Truck, Crew and Cargo Notice is allowed after the truck has been marked for arrival at the Land Border Post as it forms the declaration that SARS will hold the Road Carrier accountable to.
- The only exception to the above is in the case of transit cargo involving more than one Land Border Post (e.g. in at Beit Bridge, out at Lebombo) in which case amendments to the Advance Truck, Crew and Cargo Notice made from the time after it leaves the first Land Border Post to the time before it reaches the second Land Border Post will be possible.

63. WILL I BE REQUIRED TO REPORT PER PACKAGE TYPE AND PER TARIFF LINE?

- The rules require that the Advance Truck, Crew and Cargo Notice contain a “description of the goods” or the “six digit Harmonised Commodity Description and Coding System number under which the goods are classified” to be provided.
- For purposes of the first RCG implementation, considering that many different cargo types may be carried on a truck, SARS will not insist on multiple goods line reporting according to “package type” or “tariff description”.

•It will be acceptable for cargo reporters to report the total number of packages for a particular LRN against a single “description of the goods” and “package type” using the most appropriate package type available. For example –

- LRN 12345678/GOL/20120510/128 consists of 10 boxes soft drinks and 10 cartons of biscuits.

Table 1: Details on the LRN

LBN	Goods Line Number	Number of Packages	Types of Packages	Description
12345678/GOL/20120510/128	1	10	BX (Box)	soft drinks
	2	10	CT (Carton)	biscuits

Table 2: Acceptable reporting for the initial implementation

LBN	Goods Line Number	Number of Packages	Types of Packages	Description
12345678/GOL/20120510/128	1	20	CT (Carton)	Foodstuffs

Note: “Package Type” refers to the packages loaded onto the truck for carriage which is visible to the naked eye and not to any further packages contained therein.

64. ARE THERE DESCRIPTIONS OF GOODS THAT WILL NOT BE ACCEPTABLE?

- A plain language description of the goods will be acceptable if adequate to identify the goods and undertake risk analysis on the basis thereof.
- Vague descriptions and general terms such as “Freight All Kinds”, “Consolidated Cargo”, “General Cargo” etc. are not acceptable.
- Inserting meaningless characters or leaving the field blank is also totally unacceptable.
- The following non-exhaustive list of unacceptable and acceptable cargo descriptions will be applied in respect of the RCG implementation and is based on the “EU Guidelines on Acceptable and Unacceptable Terms for the Description of Goods”

UNACCEPTABLE	ACCEPTABLE
Agricultural products	Oranges, Fish, Rice, Bread
Aid consignments	Blankets, Medications

Animals	Horse, Poultry, Bovine
Apparel	Men's Shirts, Lingerie, Girls' Vests, Boys', Jackets
Appliances	Appliances Refrigerator, Stove, Microwave Oven, Coffee Machines
Auto Parts	Auto Parts Automobile Brakes, Windshield Glass for Automobiles
Caps	Plastic Caps
Chemicals, hazardous	Actual Chemical Name (not brand name)
Chemicals, non-hazardous	Actual Chemical Name (not brand name)
Cleaning products	Alcohol, Detergents
Consolidated	(See other specific examples in the table)
Didactic articles	Pencils, Smart boards, Books
Electronics	Computers, televisions, CD Players, Walkmans, Tape Recorders, Mobile phones, Monitors, Printers
Equipment	Oil Well Equipment, Poultry Equipment
FAK (Freight All Kinds)	(See other specific examples in the table)
Foodstuffs	Beverages, (See other examples for "Agricultural products")
General Cargo	(See other specific examples in the table)
Gifts	Dolls, Remote Control Cars
Household goods	Plates, Dishes, Tableware (See also examples for "appliances")
Industrial products	(See examples for "Electronics")
Iron and Steel	Iron Pipes, Steel Pipes, Iron Building Material, Steel Building Material
I.T. goods	(See examples for "Electronics")
Leather Articles	Saddles, Leather Handbags, Leather Jackets
Machine parts	Pumps, Seals, Engines
Machinery	Metal Working Machinery, Cigarette Making Machinery, Sewing Machines, Printing Machines
Machines	(See examples for "Machinery")
Oil	Mineral oil, Plant oil
Ore	Iron ore, Copper ore

Parts	(See examples for "Machine parts")
Personal effects	(See other specific examples in the table)
Pipes	Plastic Pipes, Steel Pipes, Copper Pipes
Plants	Tulips
Plastic Goods	Plastic Kitchenware, Plastic House ware
Polyurethane	Polyurethane Threads, Polyurethane Medical Gloves
Propellant	(See examples for "chemicals")
Rubber Articles	Rubber Hoses, Rubber Conveyor Belts
Rod	Welding Rod, Fuel rod, Copper rod
Said to Contain	(See other specific examples in the table)
Sanitary goods	Towels, Buckets, Detergents, Tooth brushes
Scrap	Plastic Scrap, Foam Scrap, Iron Scrap
Spare parts	(See examples for "Machine parts")
Textiles	Linen fabric, T-shirts, (See also examples for "Apparel")
Tools	Hand tools, Electric tools
Toys	(See examples for "gifts")
Various products	(See other specific examples in the table)
Vehicles	Boats, Cars, Bicycles
Weapons	Daggers, Machine guns
Wires	Iron and Steel Wire, Copper Wires
Wooden articles	Wooden furniture, Wooden kitchen utensils