



Free trade agreement

The free trade agreement between Switzerland and the EU ceased to be applicable in dealings with the United Kingdom (UK) on 1 January 2021. The trade agreement between Switzerland and the UK provides for the existing mutual rights and obligations under the free trade agreement (FTA) between Switzerland and the EU to continue on a bilateral level. The provisions of the Switzerland-EU FTA (including Protocol No 2 on Trade in processed agricultural products) were thus incorporated into a bilateral agreement between Switzerland and the UK. This means that existing preferential customs tariffs continue to apply between the two countries. These include duty-free admission of manufactured products (products of origin in HS sections 25-97, excluding individual products in nomenclature sections 35 and 38) and preferential treatment for processed and unprocessed agricultural goods.

For information relating to Protocol No 3 of the FTA (regarding rules of origin) see information note on Preferential Rules of Origin (Protocol No 3 FTA Switzerland-EU).

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Preferential rules of origin (Protocol No 3 FTA)

Details can be found here: [EZV - Zirkular Handelsabkommen Schweiz-Vereinigtes Königreich](#) (in German).

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Trade in goods with Northern Ireland

The Protocol on Ireland and Northern Ireland (NI Protocol) concluded between the UK and the EU will apply unless otherwise agreed between the EU and the UK. Under the NI Protocol, Northern Ireland will still have to comply with some EU rules (in particular those relating to trade in goods). The Union Customs Code will apply to certain goods brought into Northern Ireland. For example, under Article 5 of the NI Protocol, goods which are brought into Northern Ireland from another part of the UK and which are likely to enter the EU at a later stage will have to comply with the Union Customs Code (EU Regulation 952/2013).

Under the NI Protocol, Northern Ireland is fully part of the UK customs territory. It is also subject to the trade agreement between Switzerland and the UK.

The NI Protocol can be found here: [New Protocol on Ireland/Northern Ireland and Political Declaration](#)

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Customs facilitation and customs security

As long as there is no agreement between the UK and the EU along the lines of the existing customs facilitation and security agreement¹ between Switzerland and the EU, the UK will no longer belong to the common security area between Switzerland, Norway and the EU, and has third-country status.

- Consignments by land or air from Switzerland into the UK must be registered in advance with the Federal Customs Administration (FCA) in the same way as consignments to other third countries in accordance with the terms of the existing customs facilitation and security agreement. Any security checks will be conducted before the goods enter Switzerland.
- From 1 January 2022, safety and security declarations are required for imports into the UK. Details can be found in the [Border Operating Model](#) (section 3.1.5).
- For consignments by land from the UK into Switzerland, the EU requires prior notification of consignments entering an EU country and conducts security checks as necessary, as is the case for consignments from other third countries. Since the goods then already are in the common security area, no further customs security measures have to be taken when they are imported into Switzerland.
- Consignments by air from the UK into Switzerland will have to be declared to the FCA prior to crossing the border, as is the case for consignments from other third countries under the terms of the existing customs facilitation and security agreement. Any security checks will take place after the arrival of the goods in Switzerland. However, further security controls will be waived if these goods are subsequently forwarded from an airport in Switzerland to the EU.
- Switzerland and the UK have concluded a bilateral agreement on mutual recognition of Authorised Economic Operator (AEO) status, which came into force on 1 September 2021. Information on AEO status can be found [here](#) (in German).

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¹ [SR 0.631.242.05](#)



Mutual administrative and legal assistance in customs matters

The following agreements between Switzerland and the UK will continue to apply on a bilateral level:

- The 2004 agreement between Switzerland and the EU on combating fraud;²
- The additional protocol between Switzerland and the EU on mutual assistance in customs matters;³
- Legal assistance in customs matters: the European Convention on Mutual Assistance in Criminal Matters⁴ and the second additional protocol on the European Convention on Mutual Assistance in Criminal Matters.⁵

This means that there are no changes to mutual administrative and legal assistance either for government administration, private individuals or for businesses.

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² [SR 0.351.926.81](#)

³ [SR 0.632.401.02](#)

⁴ [SR 0.351.1](#)

⁵ [SR 0.351.12](#)



Recognition in relation to conformity assessment

Mutual recognition

As the UK has left the EU, the agreement between Switzerland and the EU on mutual recognition in relation to conformity assessment (MRA Switzerland-EU)⁶ has ceased to apply in bilateral trade relations between Switzerland and the UK. Since then, Switzerland has been able to conclude two MRAs with the United Kingdom covering eight sectors out of the sectors covered by the Switzerland-EU MRA. Further information on this and in particular the sectors covered can be found under this [link](#).

Exports from Switzerland to the UK have to comply with [UK regulations](#). Exports from the UK to Switzerland must meet Swiss requirements.

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Unilateral measure by UK

In addition, the UK will continue to recognise current EU requirements and conformity assessment procedures, including the CE and reversed epsilon markings for 21 product regulations, which are listed on the [UK government website](#). Therefore, when products in these sectors have been assessed by Swiss bodies recognised by the Swiss-EU MRA they will continue to be recognised in Great Britain.

⁶ [SR 0.946.526.81](#)



Unilateral measure by Switzerland

In order to avoid, to the extent possible, disruption in import of goods from the UK, the Swiss authorities recognise proof of test reports and certificates of conformity issued by UK bodies. This measure applies to 9 industrial product sectors whose technical requirements between Switzerland and the EU are deemed equivalent according to Article 1 paragraph 2 of the MRA between Switzerland and the EU. For the sake of legal certainty, this measure was and is limited in time; however, it was reviewed and extended at irregular intervals. In order to increase the predictability of possible further extensions and the stability of the measure, Switzerland and the UK have agreed to set out the dates on which this measure will be reviewed and, if necessary, extended in the future.

The scope of this practice is limited exclusively to the import of products into Switzerland, which are not subject to an EU conformity assessment from the UK.

The Swiss authorities mentioned below will,

PROVIDED (1) the testing or conformity assessment procedures of the UK meet the Swiss requirements; (2) the UK bodies have qualifications equivalent to those required in Switzerland; and (3) the UK has taken certain measures in favour of Swiss operators,

RECOGNISE test reports or certificates of conformity drawn up by a UK conformity assessment body

- which was recognised under the Agreement on Mutual Recognition between Switzerland and the EU (MRA; SR 0.946.526.81) as of 31 December 2020,
- which operated at that date under the following legislations, recognised as equivalent to Swiss requirements in accordance with Article 1 paragraph 2 ARM, and
- was accredited at the time the test report or certificate of conformity was issued.

CONCLUDE that in the event of significant legal changes in these sectors in Switzerland or the UK, the measure in the affected sector is cancelled without preconditions,

REVIEW the measure on the dates listed below (so-called review date) to determine whether it can continue to be maintained, because at these dates legal changes in the EU may have an impact on Swiss and/or UK law:

REVIEW DATE	TRIGGER	SECTORS CONCERNED
31 March 2026	<ul style="list-style-type: none"> - EU Artificial Intelligence Act - EU Safety of Toys Regulation 	Toys, products with AI components
31 March 2027	<ul style="list-style-type: none"> - EU Machinery regulation - EU Ecodesign for Sustainable Products Regulation 	All sectors, in particular machinery



RESERVE the right to review the measure at other times if there are legal changes that affect the sectors covered by this measure or influence its implementation,

NOTIFY the cancellation of the measure and the sector(s) concerned three months before it ends.

Machines

According to Directive 2006/42/EC of the European Parliament and of the Council of 17 May 2006 on machinery, and amending Directive 95/16/EC (recast) (OJ L 157, 9.6.2006, p. 24), as last amended by Directive 2009/127/EC of the European Parliament and of the Council of 21 October 2009 amending Directive 2006/42/EC with regard to machinery for pesticide application (OJ L 310, 25.11.2009, p. 29)

Competent authority in Switzerland: State Secretariat for Economic Affairs, Product Safety Unit

Recognised British Conformity Assessment Bodies: please refer to the list below

Personal Protective Equipment

according to Regulation (EU) 2016/425 of the European Parliament and of the Council of 9 March 2016 on personal protective equipment and repealing Council Directive 89/686/EEC (OJ L 81, 31.3.2016, p. 51)

Competent authority in Switzerland: State Secretariat for Economic Affairs, Product Safety Unit

Recognised British Conformity Assessment Bodies: please refer to the list below



Toys

According to Directive 2009/48/EC of the European Parliament and of the Council of 18 June 2009 on the safety of toys (OJ L 170, 30.6.2009, p. 1), as last amended by Commission Directive (EU) 2018/725 (OJ L 122, 17.5.2018, p. 29).

Competent authority in Switzerland: Federal Office of Food Safety and Veterinary Affairs, Market Access Unit

Recognised British Conformity Assessment Bodies: please refer to the list below

Gas appliances

According to Regulation (EU) 2016/426 of the European Parliament and of the Council of 9 March 2016 on appliances burning gaseous fuels and repealing Directive 2009/142/EC (OJ L 81, 31.3.2016, p. 99).

Competent authority in Switzerland: State Secretariat for Economic Affairs, Product Safety Unit

Recognised British Conformity Assessment Bodies: please refer to the list below

Pressure Vessels and Pressure Equipment

According to Directive 2014/29/EU of the European Parliament and of the Council of 26 February 2014 on the harmonisation of the laws of the Member States relating to the placing on the market of simple pressure vessels (OJ L 96, 29.3.2014, p. 45) and Directive 2014/68/EU of the European Parliament and of the Council of 15 May 2014 on the harmonisation of the laws of the Member States relating to the placing on the market of pressure equipment (OJ L 189, 27.6.2014, p. 164)

Competent authority in Switzerland: State Secretariat for Economic Affairs, Product Safety Unit.

Recognised British Conformity Assessment Bodies: please refer to the list below

Equipment and protective systems intended for use in potentially explosive atmospheres

According to Directive 2014/34/EU of the European Parliament and of the Council of 26 February 2014 on the harmonisation of the laws of the Member States concerning equipment and protective systems intended for use in potentially explosive atmospheres (OJ L 96, 29.3.2014, p. 309)

Competent authority in Switzerland: Federal Office of Energy, Electricity, Pipelines and Water Law Unit

Recognised British Conformity Assessment Bodies: please refer to the list below



Agricultural or forestry tractors

According to Regulation (EU) No 167/2013 of the European Parliament and of the Council of 5 February 2013 on type-approval and market surveillance of agricultural and forestry vehicles (OJ L 60, 2.3.2013, p. 1)

Competent authority in Switzerland: Federal Roads Office, Road Traffic Division

Recognised British Conformity Assessment Bodies: please refer to the list below

Lifts

According to Directive 2014/33/EU of the European Parliament and of the Council of 26 February 2014 on the harmonisation of the laws of the Member States relating to lifts and safety components for lifts (OJ L 96, 29.3.2014, p. 251)

Competent authority in Switzerland: State Secretariat for Economic Affairs, Product Safety Unit

Recognised British Conformity Assessment Bodies: please refer to the list below

Cableway installations

According to Regulation (EU) 2016/424 of the European Parliament and of the Council of 9 March 2016 on cableway installations and repealing Directive 2000/9/EC (OJ L 81, 31.3.2016, p. 1)

Competent authority in Switzerland: Federal Office of Transport, Law Unit

Recognised British Conformity Assessment Bodies: please refer to the list below

[List of Recognised British Conformity Assessment Bodies](#)

The UK has extended its unilateral measure indefinitely in 21 product sectors, with the exception of agricultural and forestry tractors where the measure has also been extended but limited to 31 December 2027. The British requirements for placing goods on the UK market have not changed in the above mentioned 9 sectors since 1 January 2021, or have not changed in a way that differs from Swiss legislation. Switzerland is therefore also extending its measure until 31 March 2026, and extending annually thereafter in the absence of legal changes. Products placed on the Swiss market in accordance with this official practice may bear the UK marking ("UKCA") in accordance with UK legislation if they meet the British requirements.

The provisions in the MRA Switzerland-EU regarding the marketing of products from the EU to Switzerland remain unchanged.

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Trade in agricultural products

Since 1 January 2021, the Agreement on Agriculture between Switzerland and the EU⁷ no longer applies to the UK. Under the trade agreement between Switzerland and the UK, existing mutual rights and obligations in the Agreement on Agriculture between Switzerland and the EU still apply as far as possible.

This affects the various areas (annexes) of the Agreement on Agriculture in different ways:

Agreement on Agriculture Annexes 1–3, 7, 10, 12:

In the areas of the Agreement on Agriculture between Switzerland and the EU that are not based on harmonisation of legislation or recognition of regulations equivalence between Switzerland and the EU (customs quotas, free trade in cheese, geographical indications, wine and spirits, marketing standards for fresh fruit and vegetables), bilateral solutions have been agreed with the UK based on the Agreement on Agriculture between Switzerland and the EU. Trade relations in these areas can essentially be continued as prior to 1 January 2021.

A temporary solution could be found to Annex 9 of the CH-EU Agreement on Agriculture concerning agricultural products and foodstuffs from organic farming, thereby ensuring uninterrupted trade in such products up to the end of 2022. Since the UK has adopted EU legislation in this area, it continues to recognise corresponding Swiss regulations as equivalent and Switzerland recognises those UK bodies that continue to conduct checks and certify according to EU regulations. Both countries would like to agree a long-term solution for this area.

The rules of origin applicable to Annexes 1-3 of the Agreement on Agriculture refer to Protocol No 3 of the Free Trade Agreement (see note on Preferential Rules of Origin [Protocol No 3 Swiss-EU Free Trade Agreement]).

Agreement on Agriculture Annexes 4–6:

Since legislation or recognition of the equivalence of regulations between Switzerland and the EU is harmonised in these non-tariff areas, the status quo ante for the areas covered by these annexes (plant protection, feedstuffs, seeds) could be maintained. It is only possible to import feed from the UK if the corresponding Swiss regulations are met. Only feedstuffs marketable in Switzerland may be imported. The same is true for seeds. Plants and plant products listed in Annex 5 Part B of the Plant Protection Ordinance require a plant protection certificate, involving notification of the Federal Plant Protection Service prior to import and a phytosanitary inspection upon entry into Switzerland. For import consignments entering Switzerland by land, these controls are carried out at the point of entry into the Switzerland-EU common phytosanitary area (e.g. France, Belgium or the Netherlands depending on the route and means of transport used), as is the case for goods from other third countries.

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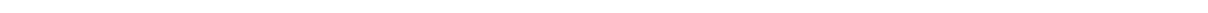
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⁷ [SR 916.026.81](#)



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Trade in live animals and products of animal origin

Now that the UK has left the EU, it is no longer part of the EU/Switzerland veterinary area. The Veterinary Agreement and Annex 11 of the Agreement on Agriculture⁸ are no longer applicable to the UK, which now has third-country status. This status applies to all countries other than EU member states, Iceland and Norway. Animals and products of animal origin from a third country can only be imported into Switzerland under specific conditions. Imports are subject to the EU's import regulations for third countries. Current legislation relating to the import, transit and export of animals and products of animal origin can be found on the [Federal Food Safety and Veterinary Office \(FSVO\) website](#).

Exporters should refer to the UK government's [guidance](#) on importing animals, animal products and high-risk food and feed not of animal origin.

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⁸ [SR 916.026.81](#)



Government procurement

Based on the trade agreement between Switzerland and the UK, existing mutual rights and obligations in the Switzerland-EU bilateral agreement on certain aspects of government procurement⁹ continue to apply bilaterally. The provisions of the existing bilateral agreement between Switzerland and the EU, or those of the WTO Agreement on Government Procurement, have been adopted in a bilateral agreement between Switzerland and the UK.

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⁹ [SR 0.172.052.68](#)



Service supplier mobility

The Agreement on the Free Movement of Persons (AFMP) between Switzerland and the EU no longer applies to the relations between Switzerland and the UK since 1 January 2021. In order to ensure mutual, facilitated market access for service suppliers after the AFMP no longer applies, Switzerland and the UK have concluded a Services Mobility Agreement (SMA). The SMA is applied provisionally since 1 January 2021.

The SMA regulates mutual access and temporary stay of service suppliers in Switzerland and the UK. Switzerland will continue the existing notification procedure for service suppliers from the UK seeking to work in the country for up to 90 days per year, with which businesses are familiar. On the side of the UK, there are sectoral market access commitments for contractual service suppliers and independent professionals (see list of sectors below), and the UK grants further preferential conditions to Swiss service suppliers. For example, the SMA does not only cover Swiss nationals but also service suppliers with permanent residency in Switzerland. Furthermore, Swiss service suppliers are not subject to an economic needs test for access in the covered sectors and are not required to provide evidence of English language skills. Swiss service suppliers may be granted access to the UK for 12 months within two calendar years.

With the SMA, Swiss service suppliers continue to have extensive access to the UK for the supply of contract-based services by natural persons. It also allows Swiss businesses to have timely access to short-term services from UK companies.

Market access to the UK under the SMA is currently limited to persons with a university degree or equivalent qualifications. However, in an exchange of letters the UK has committed to reassess the recognition of Swiss qualifications.

The SMA applies initially until 31.12.2022; however, the contracting parties may decide jointly to extend it.

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Market access in the UK for contractual service suppliers from Switzerland and for self-employed service providers from Switzerland (*in italics: sectors not open to self-employed service providers*):

- legal advisory services in respect of public international law and foreign law;
- *accounting and auditing services and bookkeeping services;*
- *taxation advisory services;*
- architectural services and urban planning and landscape architectural services;
- engineering services and integrated engineering services;
- computer and related services;
- research and development services;
- *advertising services;*
- market research and opinion polling services;
- management consulting services;
- services related to management consulting;
- *technical testing and analysis services;*
- *related scientific and technical consulting services;*
- mining;
- *maintenance and repair of vessels;*
- *maintenance and repair of rail transport equipment;*
- *maintenance and repair of motor vehicles, motorcycles, snowmobiles and road transport equipment;*
- *maintenance and repair of aircrafts and parts thereof;*
- *maintenance and repair of metal products, of (non-office) machinery, of (non-transport and non-office) equipment and of personal and household goods;*
- translation and interpretation services;
- telecommunication services;
- postal and courier services;
- *site investigation work;*
- *environmental services;*
- *insurance and insurance related services advisory and consulting services;*
- *other financial services advisory and consulting services;*
- transport advisory and consulting services;
- *travel agencies and tour operators services;*
- *tourist guides services;* and
- manufacturing advisory and consulting services.