

Call-off and Consignment Stock

The Intrastat treatment of goods used for call-off stock and consignment stock in another EU Member State is often confused and is perhaps best explained by understanding the associated VAT procedures.

Call-off stock

Call-off stock is the description given to the transfer of goods (by a VAT registered business) from one EU Member State to another to create a stock of goods from which their customer can 'call-off' (use and pay for) the goods as and when they require them.

Call-off goods delivered to storage facilities operated by the supplier, rather than the customer, should be treated as consignment stocks (see below), unless the customer is aware of the details of deliveries into storage.

If the customer is aware of the details of deliveries into storage, the intra-EU movement can be treated as call-off stock. If stocks of goods are dispatched by an EU supplier direct to the UK for call-off by more than one customer, this does not qualify for treatment as call-off stock (see consignment stock).

Reporting requirements:

The supply of call-off stock from the UK to a VAT registered business in another EU Member State can be zero-rated (subject to the normal rules illustrated in Notice 725). Boxes 6 and 8 of the VAT return and the EC Sales list declaration should be completed using a value based on the 'cost of the goods' (see Notice 725). An Intrastat dispatch Supplementary Declaration (SD) should also be completed at the time the goods are dispatched from the UK, again using a value based on the cost of the goods.

When call-off stock is received in the UK from a VAT registered business in another EU Member State, the UK business calling off the goods must complete boxes 2 and 4 (subject to the normal rules illustrated in Notice 725) and boxes 7 and 9 of the VAT return based of the cost of the goods. The UK business declares the 'call-off' on an arrivals SD at the time the goods arrive in storage.

These arrangements only apply in the UK when the goods are intended for use by UK customers in their business or to make onward supplies to their own customers.

Consignment stock

Consignment stocks are created when a VAT registered business transfers its own goods to another EU Member State to create a stock over which it has control and from which it makes supplies, or supplies are made on its behalf in that Member State.

Because the business is effectively transferring its own goods to itself in another Member State it will be making an acquisition of goods in the other Member State. The business will be liable to account for acquisition tax in the other Member State and may be liable to register for VAT there.

Reporting requirements:

If a UK VAT registered business transfers goods to another Member State to create a 'consignment stock' it must complete boxes 6 and 8 on the VAT return and an EC Sales List declaration reporting a value based on the cost of the goods.

The supply must be reported on an Intrastat dispatch Supplementary Declaration (SD) at the time the goods are dispatched. As this is a supply of own goods, the value to be declared for Intrastat purposes is the amount that would have been realised in the event of a sale under normal market conditions. This means, the value to be used for Intrastat is the same that would have been applied if the supply was made to an unrelated party (that is, direct to the customer).

If the business is required to register for VAT in the partner Member State, it will have to comply with the VAT and Intrastat requirements in that Member State.

If a business in another Member State transfers goods to the UK to create a 'consignment stock', it will be required to account for acquisition VAT (on positive-rated goods) and may be liable to register for VAT in the UK. If it is required to register for VAT in the UK, the business must complete box 2 on the VAT return (for goods with a positive VAT rate), box 4 (subject to the normal rules for claiming input tax in Notice 725), and boxes 7 an 9 with a value based on the cost of the goods.

An arrivals SD must be completed at the time the goods arrive in the UK. The value to be declared for Intrastat purposes is the amount that would have been realised in the event of a purchase under normal market conditions. This means, the value to be used for Intrastat is the same that would have been applied if the transaction was purchased from an unrelated party.

If you have any questions about this Information Sheet, please email them to uktradeinfo@hmrc.gsi.gov.uk and quote 'Information Sheet, Call-off and Consignment Stock ' in the subject box.

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