The UK and its Neighbours: views across Europe













Foreword

Hussein Kassim and Cleo Davies

It has been just over eight years since the UK voted to leave the European Union. With the approach of the third general election in the UK since the referendum, and the developments that have taken place on both sides of the Channel since the UK's departure from the EU, a reflection on relations between the UK and its neighbours is timely.

The relationship between the UK and the EU, and relations between the UK and European states that are members of the EU, the European Economic Area (EEA), or the European Free Trade Association (EFTA) are often considered distinct and separate, but as John Erik Fossum, Christopher Lord and Merethe Dotterud Leiren have reminded us, they are in fact tightly interlinked. The UK's bilateral relations with European states are influenced to a large degree, first, by the terms of the Withdrawal Agreement and the EU-UK Trade and Cooperation Agreement, and second, by the obligations of EU, EEA and EFTA countries as signatory states to the respective treaties.

The contributions from our colleagues, all members of our Living with the Neighbours Observatory, underline the importance of these triangular relations. We are grateful to them for offering their reflections on how the outcome of the UK referendum was perceived in their country, how relations have developed since then, politically and diplomatically, in trade, and in security and defence, and what they see as the prospects for relations with the UK after the elections and beyond. In our own contributions to the report, we consider the UK and the EU perspectives, and examine the significance of the bilateral agreements that the UK has signed with European states since its departure from the EU in 2020.

This report is the first output from our Living with the Neighbours Observatory, which brings together experts from several EU member states, one EFTA member state (Norway), and Switzerland. The selection of country studies aims to give a sense of the range of perspectives from different parts of the European continent. It is not intended to imply that the UK's bilateral relations with European states that have not been included are less significant or important.

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The United Kingdom



Cleo Davies and Hussein Kassim

Background

Despite calling an 'in'/'out' referendum, the UK was unprepared for a 'Leave' victory. Theresa May, who succeeded David Cameron as UK prime minister three weeks after the vote, elaborated on her leadership campaign mantra — 'Brexit means Brexit' — at the <u>Conservative Party conference</u>. She pledged an end to freedom of movement and to the jurisdiction of the EU Court of Justice in the UK, and announced that she would formally notify the EU of the UK's decision to withdraw from the EU in the first quarter of 2017. The 'red lines', notably the UK's departure from the single market and the customs union, were reaffirmed by the prime minister in <u>her Lancaster House speech</u> in January 2017 and the UK officially notified the EU of its decision to leave the EU on 29 March 2017, triggering a two-year withdrawal process. However, the negotiations only started in July 2017, after the delay caused by May's surprise decision to call a general election. Contrary to expectations, May's Conservative Party's lost its parliamentary majority, leaving her government dependent on a 'confidence and supply' arrangement with the hard-line Brexiter Democratic Unionist Party (DUP) in Northern Ireland.

Over the course of the next two years, May tried to mitigate some of the practical implications of her 'red lines', culminating in her Chequers package for the future relationship. But the EU rejected the proposal as 'cherry-picking' and several Brexiter members of her government resigned. Meanwhile, May and her negotiating team grappled with the implications of Brexit for Northern Ireland. The DUP's insistence that any future settlement should not result in differing treatment of Northern Ireland from any other part of the UK, as well as May's own deep commitment to the Union, were influential in May's solution of a 'backstop' to resolve the 'Irish trilemma', whereby if a future trade agreement did not obviate the need for customs controls within the UK – that is, between GB and Northern Ireland – the whole UK would remain in a customs union with the EU. However, it was not acceptable to hardline Brexiteers and the 'backstop' ended up crystallising opposition to May's EU withdrawal negotiations across the political spectrum. Parliament repeatedly rejected the Withdrawal Agreement that May had negotiated with the EU, leading to her resignation in May 2019.

Having become prime minister following months of domestic political turmoil, Boris Johnson set aside May's solution to the 'Irish trilemma' and brokered <u>a new deal</u> with the EU that included a 'frontstop'. Irrespective of any future trade agreement with the EU, he agreed a solution where some checks on goods are carried out in the Irish Sea between Northern Ireland and GB. Johnson secured the support he needed for his 'oven-ready deal' with the EU and was able to celebrate the UK's official and orderly departure of the EU on 31 January 2020. However, in a matter of weeks, <u>Johnson denied to businessmen</u> that the Protocol would involve these customs checks and less than a year after endorsing the 'oven ready deal', his government introduced legislation (<u>the Internal Market Bill</u>) in Parliament to override aspects of the Protocol on Northern Ireland. Meanwhile, he pursued the thinnest possible relation with the EU – <u>a Canada-style free trade agreement</u>.

UK government policy towards the EU after January 2021 was initially marked by a continuation of the same sovereigntist ideology that had marked London's approach to the negotiations. The Johnson government rejoiced in the country's new-found freedoms and welcomed the opportunity for the nation to recover its global status. It also sought to distance itself from the EU. The Integrated Review 2021, for example, made only minimal reference to 'Europe'. And instead of closer relations with the EU, the UK favoured bilateral agreements with EU member states.

Crucially, in this post-negotiation phase, the UK refused to recognise obligations under the Northern Ireland Protocol, which chief negotiator, Lord Frost, would later call a <u>'temporary fix'</u>. The UK made none of the infrastructural investments required to implement the terms of the Protocol, and unilaterally extended grace periods without informing the EU in March 2021. In July, the UK called for a renegotiation of the Protocol, by which time it had entirely lost the trust of the EU, who deliberately slowed progress in the committees under the Trade and Cooperation Agreement (TCA).

Despite the stand-off over the Protocol, Russia's invasion of Ukraine led to UK-EU cooperation in imposing economic sanctions on Moscow and on military support. Coordination between the two sides takes place in G7, NATO and various other forums. Although the Johnson government had rejected the more formalised cooperation on foreign policy and security initially envisaged in the Political Declaration on the future relationship, the UK applied to join PESCO in 2022. Unsurprisingly, Johnson and his government did not publicise the move.

The UK's preparedness to cooperate within the EU in discussions of foreign policy issues, while rejecting a more institutionalised relationship with the EU, did not prevent the UK, under new prime minister Liz Truss, from agreeing to participate in the European Political Community – a loose pan-European forum, not formally aligned with the EU.

Relations between the UK and the EU only began to improve when the impasse over the Northern Ireland Protocol was broken by the Sunak government, with the adoption of the <u>Windsor Framework</u> in February 2023. Since he became prime minister in October 2022, Rishi Sunak adopted a pragmatic approach to the EU, in marked contrast to his predecessors.

Current relations with the EU

Following its exit, the UK interacts with the EU mainly through <u>committees</u> created under the Withdrawal Agreement and the TCA to implement the two agreements.

The Windsor Framework remains the most sensitive part of the Withdrawal Agreement. It eases customs checks on goods intended for Northern Ireland, and introduces a new labelling system for these goods, which are now stamped 'not for EU'. The Agreement also gives the UK government more control over the VAT rates that apply in Northern Ireland, and it underlines that medicines in the market in Northern Ireland will be regulated by the UK. The Framework also introduces mechanisms for the newly restored Northern Ireland Assembly to vote to pause and even disapply new or updated EU regulations on goods (respectively via the 'Stormont Brake' and 'applicability motions').

Yet, the UK and the Unionist parties in Northern Ireland are alert to what they might perceive as overzealous interpretation by the EU. Some Unionists continue to challenge the principle of checks in the Irish Sea on the grounds that Northern Ireland is treated differently from other parts of the UK.

Another area of the Withdrawal Agreement is citizens' rights. The UK <u>has raised</u> concerns about equal treatment of UK citizens between EU member states and the challenges faced by UK nationals who are unable to exercise their rights because they cannot evidence their status in some member countries. London has also <u>suggested</u> that the data on the residency schemes in some member states could be made more consistent and more readily accessible.

Meanwhile, although the TCA specialised committees met in 2021 and 2022, the strains in the UK-EU relationship froze cooperation. When the Windsor Framework was announced, both parties committed to 'exploit fully the potential' of the TCA. The UK decided to participate in the EU's Horizon and Copernicus programmes (for cooperation on scientific research and development and earth observation), though it had reservations about the size of the UK's financial contribution, and it decided against joining Euratom (the EU's atomic energy programme) on financial grounds. Furthermore, it took extensive debate before the Partnership Council agreed to extend existing 'rules of origin' for electric vehicles beyond December

2023 – although carmakers on both sides had lobbied heavily for an extension to avoid tariffs of 10 per cent on exports between the UK and EU.

Discussions continue on energy security continue, where the UK has a strong interest. Finalising electricity trading arrangements to facilitate the flow of energy between the UK and EU is proving more difficult than anticipated. Recognition agreements on professional qualifications are also moving slowly. An arrangement for architects is the only one currently under discussion. Meanwhile, the annual negotiation on fish quotas works well, but fisheries continues to be a sensitive area for the EU. The UK has legislated on measures for conservation and management of certain species, which it could not have done as an EU member state. Civil society organizations and conservation groups on both sides <a href="https://www.nichentendendows.nichentendendows.nichendendows.nichentendendows.nichentendendows.nichentendendows.nichentendendows.nichentendendows.nichentendo

Some technical cooperation agreements have been signed, though their provisions are generally quite thin. The parties signed a Memorandum of Understanding (MoU) on financial services in June 2023, which provides for regular meetings to discuss <u>regulatory cooperation</u> – though this is not a forum for agreeing new 'equivalence' decisions (to facilitate market access), which lies outside the TCA and <u>remains</u> a unilateral matter for the two parties. Given the proximity of the two markets and the expertise on both sides, the parties are also <u>negotiating</u> a supplementary agreement to the TCA on competition policy, which will cover cooperation and information exchanges. On air transport, the UK <u>has agreed</u> bilateral arrangements on additional all-cargo services with more than 20 EU member states. But the EU has been <u>reluctant</u> to deepen cooperation in other areas that would reduce the bureaucratic burden for UK businesses and professionals in particular.

In other areas, forums foreseen in the TCA have met for the first time. They include the dialogues on <u>cyber</u> issues (14 December 2023) and <u>counterterrorism</u> (2 February 2024), where useful exchanges have taken place – the only foreign policy aspects that are included under the TCA. Three working groups (Organic Products, Motor Vehicles and Medicinal Products) under the trade Specialised Committee on Technical Barriers to Trade (TBT) are convening for the first time in 2024.

Finally, the parties exchange on the development of regulation on each side and discuss the impact of potential divergence on TCA provisions on <u>level playing field</u>. The UK is concerned about of the EU's Green Deal Industrial Plan, which is underpinned by a major relaxation of EU state aid rules.

Although both the EU and the UK have expressed satisfaction with the TCA framework, and spoken of a desire to exploit its full potential, there are significant constraints on how far this can go. The EU has <u>insisted</u> that the scheduled review will be limited to implementation.

Beyond the two Agreements, the UK continues to cooperate with the EU in a number of EU and non-EU forums on security, defence, and military matters. In a move that took many on both sides by surprise, UK prime minister Rishi Sunak and Commission President Ursula von der Leyen announced cooperation between the UK authorities and Frontex, the EU's European Border and Coast Guard Agency, on border management and security. The agreement signed in February 2024, foresees 'joint activities designed to tackle challenges such as illegal migration and cross-border crime efficiently'.

Future relations

Although a succession of polls has shown that a majority of the public are sceptical about the success of Brexit, the terms of debate about the future of the UK's relationship with the EU remain limited. Hardline Brexiters remain a strong, if diminished, force in the Conservative Party, and have been critical of Rishi Sunak's pragmatic approach. Some, including former chief negotiator Lord Frost, continue to argue that Brexit has not been fully realised and <u>called recently</u> for the Windsor Framework to be scrapped.

The Labour Party, meanwhile, though far ahead in the polls, has adopted a cautious approach to relations with Europe, at least partly in an effort to win back <u>'red wall' seats</u> – those traditional Labour seats lost to Johnson's Conservatives in 2019 and who voted a majority to leave in 2016. Having ruled out membership of either the single market or the customs union, the UK's 'red lines' first outlined by Theresa May, remain the same, effectively cementing a cross-party consensus on 'making Brexit work'. The response of some Brexiters to Labour's thoughts on future cooperation with the EU on international and foreign policy matters give an illustration of the kinds of arguments with which a Labour government that seeks to move the UK closer to the EU will have to engage. It also illustrates the hostile reaction that even a move towards Sanitary and Phytosanitary (SPS) alignment – a practical way of reducing the friction on UK exports – is likely to provoke.

On defence and security, however, the Labour Party has been much more forthright in its intentions to seek a more structured dialogue with the EU, which contrasts with the current government's preference for informal cooperation on an ad hoc basis, when issues arise.

Whatever the complexion of the next government, it will continue to face challenges linked to the UK's departure from the EU. As well as leftovers from the current government, such as the introduction of full checks on imports from the EU, which follows the repeated postponements of border checks since 1 January 2021, there are fundamental questions that Brexit poses about the shape, capacity, and the future of the UK state, including its territorial governance. It also remains to be seen whether a future government will be able to mitigate the impact of actions on the EU side, such as the introduction of an entry-and-exist system at the external border of the EU for all non-EU citizens or the spill-over effects of future EU regulatory development for UK trade with EU member states.

The European Union



Cleo Davies and Hussein Kassim

Background

For all the regret felt in Brussels and across national capitals in the wake of the UK referendum, the EU found instant unity in addressing the challenges presented by the departure of a large, internationally influential member state that had contributed significantly to its development and growth, and that was also (with France) one of Europe's leading military powers. At least three of the four principles, or 'red lines', that the <u>EU outlined</u> within days of the 'Leave' vote – the indivisibility of the four freedoms, no 'cherry picking', negotiation of the terms of withdrawal before opening discussions on trade – guided it through the negotiations and continue to inform its approach to the UK. Information-sharing and transparency, including the reporting of bilateral contacts with the UK to the EU institutions and other member states, also persist from the negotiations phase.

For the EU, the <u>Withdrawal Agreement</u>, covering citizens' rights, the payment by the UK of its liabilities, and three Protocols including the Northern Ireland Protocol, has been foundational. Suspicion on the EU side that the UK had little intention of implementing the Protocol coloured the EU's approach to Trade and Cooperation (TCA) negotiations, leading to its insistence on the inclusion of failsafe mechanisms and safeguards. For the EU, the Protocol protects the integrity of the single market by limiting the possibility that exports from GB destined for Northern Ireland find their way into Ireland and other EU member states. It also represents a preparedness to accommodate the special circumstances of Northern Ireland.

Operationalisation of the terms of the Protocol requires close cooperation between authorities on the UK and EU side, as well as significant investment in infrastructure. So when the UK showed little sign of adopting the measures needed to operationalise the terms of the Protocol, and then introduced the Internal Market Bill, which threatened to override key provisions of the Protocol, the EU responded by freezing discussions with the UK on trade matters. At the same time, the European Commission looked for ways of overcoming the practical difficulties reported by stakeholders in Northern Ireland.

Only when the Sunak administration made it clear that it wanted to end the <u>stand-off</u> over the Protocol that had marked the Johnson and Truss premierships, which led ultimately to the February 2023 <u>Windsor Framework</u>, did relations thaw. However, the experience over the negotiation and then the non-implementation of the Protocol has cast a long shadow so far as the EU is concerned and enduring political trust will take time and effort to rebuild.

EU relations with the UK

The formal relationship with the UK mainly takes place in the system of <u>committees</u> established under the Withdrawal Agreement and TCA. The Windsor Framework altered how the Northern Ireland Protocol <u>operates</u>. It eases customs checks on goods intended for Northern Ireland, which are to be labelled 'not for EU', gives the UK government more control over the VAT rates that apply in Northern Ireland, and it underlines that medicines in the market in Northern Ireland will be regulated by the UK. It also introduces mechanisms for the newly restored Northern Ireland Assembly to vote to pause and even disapply new or updated EU regulations on goods (respectively via the 'Stormont Brake' and 'applicability motions').

Yet, despite a normalisation of relations, the EU remains cautious about UK compliance, for example, in regard to the number and quality of inspections made by UK authorities of goods entering the Northern Ireland market.

Citizens' rights has also proved a contentious area. The EU has expressed concern about how the UK plans to ensure EU nationals can transfer from 'pre-settled' to 'settled status' under the UK's EU Settlement Scheme, delays in updating the digital status of EU citizens, and the lack of legal clarity for EU citizens with UK residence status as to whether their rights are guaranteed by the Withdrawal Agreement or solely by domestic law.

Following agreement on the Windsor Framework, both sides <u>committed</u> to 'exploit fully the potential' of the TCA where cooperation had been frozen. They <u>finally</u> reached an <u>agreement</u> in September 2023 on the UK's participation in the EU's Horizon and Copernicus programmes (or cooperation on scientific research and development and earth observation). And, after extensive debate, the Partnership Council agreed in December 2023 to extend by three years the existing 'rules of origin' for electric vehicles and batteries – carmakers on both sides had lobbied heavily for an extension to avoid tariffs of 10 per cent on exports between the UK and EU being applied form 1 January 2024.

Cooperation on energy security continues. Discussion over electricity trading arrangements (to facilitate the flow of energy between the UK and EU) is proving more difficult than anticipated, while the possibility of coupling their respective Emissions Trading Regimes has not been addressed, even though it had been envisaged in the TCA. Recognition agreements on professional qualifications are also moving slowly. And although the annual negotiation on fish quotas works well, fisheries continues to be a sensitive area. Some member states are concerned that the unilateral UK measures for conservation and management of certain species are eroding fishing and access rights for EU fishers. For this reason, the EU has requested consultations under the TCA dispute settlement over the UK's permanent closure of the sand eel fishery.

Some technical cooperation agreements have been signed with the UK, though their provisions are generally quite thin. The parties signed a Memorandum of Understanding (MoU) on financial services in June 2023, which provides for regular meetings to discuss <u>regulatory cooperation</u>, but the meetings are not a forum for agreeing new 'equivalence' decisions (to facilitate market access), which lies outside the TCA and <u>remains</u> a unilateral matter for both the EU and the UK. The parties are also <u>negotiating</u> a supplementary agreement to the TCA on competition policy, which will cover cooperation and information exchanges.

In other areas, forums foreseen in the TCA have met for the first time. They include the dialogues on <u>cyber</u> issues (14 December 2023) and <u>counterterrorism</u> (2 February 2024), where useful exchanges have taken place – the only foreign policy aspects that are included under the TCA. Three working groups (Organic Products, Motor Vehicles and Medicinal Products) under the trade specialised committee on Technical Barriers to Trade (TBT) are convening for the first time in 2024.

Finally, the parties exchange on the development of regulation on each side and discuss the impact of potential divergence on TCA provisions on <u>level playing field</u>. The EU has expressed some <u>concerns</u> over the possible watering down of workers' rights.

Although both the EU and the UK have expressed satisfaction with the TCA framework, there are important constraints on what can be achieved in terms of easing barriers to trade. The EU has <u>underlined</u> that the planned review of the TCA will consider implementation and will not be the occasion for renegotiation.

More broadly, and independently of the formal committee structures of the Withdrawal Agreement and the TCA, the EU cooperates very closely with the UK across a wide range of actions in response to Russia's February 2022 invasion of Ukraine. As well as the imposition of sanctions on Russia, the EU and the UK have worked together on military and security matters. Cooperation has taken place within the G7 and NATO, but also bilaterally including at the highest levels. The UK has been an important partner for the EU, and in contrast to the relationship elsewhere, the two sides have a shared understanding of the threat posed by Russian aggression and have been able to coordinate effectively. Indeed, cooperation on Ukraine began at a time when relations between the UK (under the Johnson government) and the EU were at a low due to the non-implementation by the UK of the Northern Ireland Protocol. The ability of

the two sides to work alongside each other played an important part in contributing to better relations and also highlighted the extent to which, despite other differences, the EU and the UK share similar geopolitical views and can achieve more when they cooperate.

Future relations

Although the relationship could be closer, the prospects are limited on the economic or commercial side, which is a source of frustration for some on both sides. Memory of the negotiations, when the UK tried to divide the member states, has only strengthened the unity of the EU27 and given justification to the Commission's insistence on a multilateral approach to management and policing of relations with the EU, while the non-implementation of the Northern Ireland Protocol continues to cast a long shadow.

The UK remains a demandeur in the EU's eyes, but unless the UK changes its 'red lines' – for example, by proposing to join the customs union or the single market – it will not be able to move up the steps of the 'Barnier staircase', which presents the balance between levels of access to the single market and the corresponding obligations of third countries in relation to the EU. Even should there eventually be concrete proposals to negotiate or renegotiate TCA provisions, the EU's approach will be transactional. This plays out in relation to increasing mobility for touring musicians. Having rejected the EU's proposal during the TCA negotiations, the UK is now seeking an agreement on this issue. But the EU approach is to ask: is there equal benefit on the EU side?

Prospects for cooperation in foreign, defence, and security more broadly at a time of geopolitical change and challenge – Russia's war in Ukraine, the threat posed by China, the US' faltering global leadership – are somewhat different. Since they share a similar outlook on global problems and challenges, and due to the UK's military strength and international reach, the EU would likely welcome closer relations. However, since it was the UK that rejected any institutionalised form of foreign policy cooperation with the EU, it would be up to a future UK government to take the first steps.

Many observers view a move towards an institutionalised form of UK-EU cooperation in foreign policy and security as offering the most likely avenue for strengthening political trust between the two. However, on the UK side, a new government would need not only to have the courage to make the case for such a relationship, but also be prepared to fend off claims from some quarters domestically that such a move sets the UK on the path to rejoining the EU, or that the government is acting against the 'will of the people' as expressed by the 2016 UK referendum.

On the EU side, the concern to demarcate security and defence, an area which is relatively open for developing stronger relations with the UK, from access to the single market, could hamper deeper cooperation. The challenge arises since a key element of the EU's defence policy involves common procurement, but participation would only be open to members of the single market, from which the UK excludes itself. Should developments proceed to that point, resolving this question will demand creativity.

Bilateralism between the UK and EU member states

Cleo Davies and Hussein Kassim

The UK's decision to leave the EU unsurprisingly raised concerns about the impact on the bilateral relations between the UK and EU member states. Supported by a network of embassies across European capitals, the UK had maintained strong bilateral relations across the EU. For many member states, the bilateral relationship with the UK is central to their security and defence. When Theresa May announced her 'red lines' on Brexit in October 2016, she was quick to emphasise in the same speech that the UK was 'leaving the EU but not the continent of Europe' and that it would 'not abandon friends and allies'.

Nevertheless, Brexit did mean many areas would now require more purposeful bilateral cooperation, even as the opportunities and arenas for interaction between UK government officials and civil servants and their counterparts in European member states changed considerably.

Under May's premiership, there was a first effort at putting in place structured dialogues for bilateral cooperation with EU member states. However, as a result of the reduced bandwidth in London and the increasingly tense negotiations between the UK and the EU, serious consideration of the future of bilateral relations with EU member states could not take place until a later phase.

The UK-EU relations soured under Johnson's premiership, so did bilateral cooperation with EU member states. The bilateral relations with the UK's closest neighbours, and arguably most important partners, suffered the most. UK-Ireland relations reached a very low point, not least because of the very difficult negotiations surrounding the implications of Brexit for Northern Ireland, whilst relations with France were very fraught up until Johnson's departure.

Following the end of the negotiations on the future relationship, the UK turned its attention to developing a more systematic way of liaising and engaging with member states at a bilateral level post EU-membership. However, despite the strong political and functional pressures from all sides for pursuing bilateral ties following the UK's departure from the EU, cooperation got caught up in the politics of Brexit. As the fallout over the UK's non-implementation of the Withdrawal Agreement unfolded almost immediately after the end of the transition period, there was a concerted effort amongst member states to hold back on deepening bilateral cooperation.

Once tensions in UK-EU relations eased following the change of personnel in Downing Street mid-2022, a flurry of bilateral agreements has since been agreed between the UK and EU member states. Meanwhile, Russia's aggression of Ukraine has been a major driver in strengthening and deepening bilateral cooperation with EU member states on security and defence.

Bilateral relations

The UK has now established strategic dialogues with 24 of the 27 EU member states (see Table 1). Naturally, bilateral relationships have their own specific characteristics and historical legacies - Cyprus and Malta are Commonwealth members for instance — which are reflected in the substance of agreements signed and the celebrations of key bilateral landmarks. There are also geographical determinants with the neighbouring countries of Belgium, France, the Netherlands and Denmark, which all refer to maritime affairs and to developing strong agreements on energy infrastructure. But all the strategic dialogues established since Brexit are broad in scope. Cooperation extends well beyond foreign policy and security and defence, to include law enforcement and (criminal) justice cooperation, economic and

trade cooperation, climate change, energy (the latter mainly with neighbouring countries), research, science and education, and people to people links, which sometimes includes culture. Migration also features prominently, especially in the more recent initiative for bilateral cooperation.

Table 1. Joint bilateral statement/declarations establishing strategic dialogues

Austria	Joint Vision Statement on Strategic Dialogue	20 November 2023 (Cameron)		
Belgium	Joint Declaration on Bilateral Cooperation	30 November 2021 (Johnson)		
Bulgaria	Joint declaration on Strategic Dialogue	24 October (Cameron)		
Croatia	Joint Declaration on Bilateral Cooperation	28 April 2023 (Cleverly)		
Cyprus	Memorandum of Understanding establishing a strategic cooperation	15 November 2022 (Cleverly)		
Czech Republic	Joint Statement of Intent	27 May 2022 (Truss)		
Denmark	Joint Statement	20 June 2023 (Cleverly)		
Estonia	Joint Leaders Statement	6 June 2022 (Johnson)		
Finland	Joint Declaration on the Strategic Partnership	21 May 2024 (Cameron)		
France	Joint Leaders Declaration	10 March 2023 (Sunak)		
Germany	UK-Germany Joint Declaration	30 June 2021 (Raab)		
Greece	Memorandum of Understanding on: strategic bilateral framework	24 November 2021 (Truss)		
Italy	Memorandum of Understanding on Bilateral Cooperation	27 April 2023 (Sunak)		
Latvia	Joint Declaration of cooperation	6 December 2021 (Truss)		
Lithuania	Joint Declaration on bilateral cooperation	30 May 2022 (Truss)		
Luxemburg	Joint Statement on bilateral cooperation	12 May 2023 (Cleverly)		
Malta	Bilateral Cooperation Framework	10 February 2023 (Cleverly)		
Netherlands	Joint Statement on foreign, development and security bilateral cooperation	16 November 2022 (Cleverly)		
Poland	2030 Strategic Partnership on foreign policy, security and defence cooperation	5 July 2023 (Cleverly and Wallace)		
Portugal	Joint Declaration on Bilateral Cooperation	15 June 2022 (Johnson)		
Romania	Joint Statement	23 March 2023 (Cleverly)		
Slovakia	Joint Declaration	21 February 2023 (Cleverly)		
Slovenia	Statement of Intent	23 February 2022 (Truss)		
Sweden	Joint Declaration on <u>Strategic partnership</u>	13 October 2023 (Sunak)		

The favoured instruments for establishing bilateral dialogues and deepening cooperation are non-binding memorandum of understandings (MoUs) and statements, that do not give rise to any obligation for either party under international law. Deepening cooperation in specific areas foreseen in the more general agreements usually also takes the form of a non-binding MoUs or declarations of intent. So called soft-law instruments are flexible but they do require good and enduring working relations to add flesh to the bone.

However the institutional arrangements of the UK bilateral relations with EU member states are for the most part looser than when the UK was a member state and often in their infancy. The strategic dialogues are annualised and overseen by the Secretary of States for Foreign Affairs or senior diplomats. Practical cooperation also takes the form of a combination of reviving pre-exit forums that had become redundant by virtue of EU membership and creating new venues to respond to the functional needs for cooperation in areas such as trade or policing. Embedding these forms of cooperation will take time and commitment. In this respect, the UK does have the benefit of its network of embassies across EU capitals and bulked up its local presence to foster bilateral cooperation on matters such as trade and investment.

Future relations

Both the UK and Individual member states have been very keen to strengthen and deepen bilateral cooperation in the wake of the UK's departure from the EU. The number of agreements and range of areas covered in statements of intent for cooperation are testimony not only to the UK's enduring centrality as a partner for EU member states, especially in security and defence, but also to the close ties between people and businesses. Nevertheless, bilateralism will remain circumscribed by the legal provisions of the existing formal agreements between the UK and the EU and the obligations of member states.

Moreover, even in areas where there are no legal constraints, member states may decide that they prefer an EU-wide approach have committed to share information about bilateral negotiations with the UK with their counterparts in the UK Working Party in the Council. Cooperation between the EU27 is also exemplified by the close-knit collaboration between the ambassadors in London, largely coordinated by Europe House.

Meanwhile, the Labour Party's shadow foreign secretary, David Lammy, <u>has indicated</u> that Labour would focus on key bilateral relationships, singling out France, Germany, Ireland, and Poland. This suggests that if Labour were to form the next government in the UK, there may be a shift away from a blanket coverage and investment of resources in all bilateral relations with EU member states, to a more focused approach that combines closest neighbours and strategic partners, notably for security and defence.

In any case, bilateral relations with EU member states will no doubt continue to be an important element of the UK's efforts to ensure it leverages the opportunities of its agreements with the EU. In what can be characterised as a two-pronged approach, the UK uses non-binding agreements at a bilateral level to support the implementation of provisions in UK-EU agreements or to complement such agreements. For instance, following formal association to EU research programmes Horizon and Copernicus in late 2023, the UK has focused its efforts on cementing collaboration at a bilateral level with EU member states. Similarly, after finalising a working arrangement with Frontex on reinforcing operational cooperation in areas including irregular migration and cross-border crime, the UK has also made agreements with member states to cooperate in these areas, including a forthcoming Law Enforcement Cooperation Agreement with Belgium.

Cyprus



Adonis Pegasiou

Background

The Republic of Cyprus (RoC) has long and distinctive historical and political ties with the UK, which continue to shape the relationship between the two countries since Brexit. Since gaining independence from British colonial rule in 1960, the country is a member of the Commonwealth. Upon the establishment of the Republic of Cyprus (RoC), the UK was designated as a 'Guarantor Power' of the country's Constitution, along with Greece and Turkey. These three countries possess the authority to intervene, even unilaterally if required, to prevent any alteration to the Constitution or to reinstate it in case of violation.

Since 1960, the UK has maintained two Sovereign Base Areas (SBAs) on the island under the Treaty of Establishment, an international agreement involving the three Guarantor Powers and the newly formed RoC. The SBAs serve a military purpose and fall under the responsibility of the UK Ministry of Defence. Although the SBAs and the RoC are distinct legal entities, there is no hard border on the island, allowing for unrestricted travel and for goods to pass without undergoing checks. Moreover, the Treaty of Establishment prohibits the creation of customs checks or any other frontier barriers on the island.

Importantly, the historical ties between the two countries have expanded beyond legal and political obligations, to facilitate a multifaceted relationship. This relationship covers commercial, cultural, educational, societal, financial aspects and more. Over 300,000 Cypriots reside in the UK and over one million British tourists visit Cyprus every year, while tens of thousands of Cypriots have opted to study in the UK. These figures are noteworthy, given Cyprus has a population of approximately one million. Furthermore, as EU member states, the two countries developed a collaborative relationship, with closely aligned voting patterns in the Council of the EU, regarding notably financial services and tax harmonisation.

However, there is a key difference regarding their stance on the European project. The political elite in Cyprus is strongly pro-European, and EU membership has never been questioned. As a committed EU Member State, Cyprus respected the process of the Brexit negotiations as well as their outcome. At the same time, Cyprus was concerned to maintain its bilateral ties with the UK.

Bilateral relations

Initially, there were concerns over the legal and political implications of Brexit for Cyprus, because of the possibility that the UK's departure from the single market and customs union would require the introduction of a customs border for the SBAs. Such a development would not only have risked sparking economic, social, and political tensions, but would violate the UK's obligation under the Treaty of Establishment not to establish customs posts on the island. The challenge for all parties involved, whether the EU, the UK, or the RoC, was to find a mutually acceptable solution without causing political disruption.

The <u>Protocol</u> relating to the SABs, which is part of the Withdrawal Agreement, <u>does ensure</u> the continuation of the 1960 arrangements, and maintains the status quo prior to Brexit. It provides for the application of certain areas of Union law in the SBAs, enforced through Union institutions and bodies, while safeguarding UK rights under the Treaty of Establishment, especially concerning its military bases.

A Joint Committee, established under the Withdrawal Agreement and co-chaired by officials from the European Commission and the UK Government, facilitates the implementation and application of the Protocol. To date, the Committee has met five times, which demonstrates both sides' commitment to achieving a smooth implementation and to resolving any technical or legal issues.

Furthermore, as a Guarantor Power of the RoC Constitution, the UK post-Brexit continues to have an obligation to promote a peaceful resolution to the 'Cyprus Problem'. The current situation – the de facto division of the island and the Turkish military occupation of the country's northern part – violates the Constitution of the RoC. As there are ongoing efforts between the island's two communities to find an amicable solution, the UK's obligation carries even greater weight. Indeed, the role of the UK in the process may prove pivotal as a possible facilitator and because it will have to give its consent for any agreed solution.

Brexit has not affected the long-term commitment of the UK government to contribute to resolving this problem. On the contrary, chief UK government officials have <u>publicly reaffirmed</u> their commitment on numerous occasions. This unique aspect of UK-Cyprus relations underpins the depth of their ties and their enduring connection.

Following the UK's departure from the EU, both countries have sought to preserve a close and cooperative relation. Cyprus and the UK signed a comprehensive Memorandum of Understanding (MoU) establishing a strategic cooperation in November 2022, which includes an annual review of implementation progress. The key provisions of the MoU covered the following areas: foreign and regional policy; defence and security; education, culture, science, and innovation; trade and prosperity; maritime affairs; and climate.

In the <u>annual review</u> of December 2023, both parties reaffirmed their commitment to 'identify future initiatives to build on their close and historic relations and their joint ambition to work even closer in the pursuit of new opportunities, based on mutual respect, as part of the process of establishing a strategic cooperation'. Particular reference was made on the breadth of shared foreign policy objectives and cooperation in bilateral and multilateral fora as well as the alignment of both countries on key international issues, such as the war in Ukraine and developments in the Middle East.

Regarding defence and security, Cyprus and the UK signed a <u>Bilateral Defence Cooperation Plan</u> during the Ministry of Defence staff talks in September 2023, delivering on provisions in the the comprehensive MoU agreement. They had already signed an <u>MoU for Defence and Military Cooperation</u> in April 2019, allowing for significant progress in enhancing their bilateral cooperation.

The December 2023 review of the comprehensive MoU on bilateral relations highlights the high-level defence engagement, which focuses on training, education, and interoperability. For instance, the Defence and Security Academy of the Cypriot Ministry of Defence in collaboration with the High Commission of the UK in Cyprus, the UK Defence Academy and Cranfield University organized a 'Strategic Leadership Programme' in early 2024. This involved training to strengthen leadership and management at a strategic level in defence and the wider security sector, as well as to prepare future senior defence officials and operatives with the necessary tools and skills for strategic decision-making.

Furthermore, both parties have signed additional agreements to deepen cooperation in specific areas. In February 2023, the Cypriot Deputy Ministry for Shipping and the UK Department of Transport <u>signed</u> an MoU for enhanced cooperation in the shipping sector. Previously, in February 2022, both countries <u>adopted</u> an MoU on the Protection and Promotion of the rights of LGBTI+ People in Europe and the Commonwealth. Meanwhile, an MoU is in place between the Central Bank of Cyprus and the UK banking supervisory authorities, the Bank of England and Financial Conduct Authority.

Undoubtedly, the intention on both sides to maintain strong ties since the UK's departure from the EU is evident and sincere, and efforts are made to make sure commitments are implemented. However, Brexit has nevertheless had an adverse effect on some aspects of the relationship. For instance, the high number of Cypriot students attending UK universities was traditionally considered a cornerstone of bilateral relations. Since the end of the transition period, Cypriot students now have the same status

as other international students regarding fees and admission to UK universities. They face much higher costs have lost access to student loans at a time when fees in the UK have increased significantly for international students.

As a result, there has been a significant decline in the number of Cypriot students choosing the UK for tertiary education. According to data released by UCAS on the number of international applicants to UK undergraduate courses, there had been a 50 per cent drop for Cyprus in January 2023 compared to the same point in the 2020 entry cycle. Cypriot students are now opting for more affordable alternatives, something that is expected to have a long-term impact on the affiliation many Cypriots feel towards the UK, the presence of the Cypriot community in the UK, and overall people-to-people relations between the two countries.

This development has been a point of major concern for Cypriot officials, who repeatedly raise the issue in bilateral meetings. The adverse impact has also been acknowledged by the UK, with the UK High Commissioner in Cyprus even noting that the single most important consequence of Brexit for UK-Cyprus relations is the impact on higher education. In February 2024, the High Commissioner added that with fewer and fewer Cypriot students choosing to study in the UK, new generations lose the benefit of having lived and studied in the UK, and the connection between the two peoples will fade.

Even so, no arrangement that could potentially alleviate this issue has yet been agreed between the two countries, and the situation, if left as it is, is bound to lead to even fewer Cypriots studying in the UK in the coming years.

Brexit has also had an impact on trade between the two countries. For Cyprus, the UK has traditionally been one of its main trading partners, both for imports and exports. Following Brexit, imports from the UK, as a percentage of total imports, have decreased to approximately half the value, as Cypriot importers seek alternative suppliers within the single market. On the other hand, the importance of the UK as a key export destination for Cyprus has been less affected following Brexit. Despite a slight decrease in exports to the UK as a percentage of total exports, in absolute numbers, exports to the UK have continued to grow.

Table 1. Cyprus trade with the UK and with the world since the 2016 UK referendum

Flow	Total Imports		Total Exports			
Year \ Partner	GB:United Kingdom	WORLD (Total)	GB:United Kingdom	WORLD (Total)	Imports as %age	Exports as %age
2017	503,070,028	8,216,208,477	168,193,169	2,968,382,278	6%	6%
2018	604,549,664	9,199,954,136	171,109,246	4,309,883,194	7%	4%
2019	577,421,590	8,200,052,561	187,200,166	3,136,969,096	7%	6%
2020	644,789,360	7,642,096,045	178,532,114	2,746,551,386	8%	7%
2021	319,442,131	8,726,273,731	211,661,753	3,387,707,710	4%	6%
2022	352,797,300	11,470,010,035	230,902,703	4,208,766,393	3%	5%

Source: Cyprus Statistical Service

Future relations

Overall, while the political elite in Cyprus seriously regretted the referendum result, the stance towards the UK never became hostile or vindictive. Given the particular historic and political background of bilateral relations, the RoC would never risk causing turmoil in its relationship with the UK, a Guarantor Power of its constitution.

On the contrary, both countries have pursued a positive agenda in an attempt to further enhance their bilateral relations. The comprehensive MoU signed in 2022 covers all areas of potential cooperation and provides the basis for further, more focused, agreements on specific areas of interest. The effectiveness and value of this non-binding agreement has not yet been tested over time. Nevertheless, in the period leading to the first annual review certain promising developments have taken place and lay the foundations for a continued enrichment of bilateral relations.

With Cypriot exports growing in absolute numbers and the number of tourist arrivals from the UK standing out relative to other countries, the only adverse effect that remains a thorny and unresolved issue, with little prospect of a solution, relates to Cypriots' access to UK universities. The number of Cypriot students is falling significantly, and this is bound to have both short- and long-term effects in the people-to-people relations between the two countries.

Monika Brusenbauch Meislová and Petr Kaniok

Background

The outcome of the 2016 referendum was initially met with dismay, disappointment, and a significant degree of bewilderment among the Czech political elite and population. Brexit was neither politicized not a particularly salient an issue in Czech politics. Nevertheless, the negotiations, characterized by their slow and exhausting nature, frustrated the Czechs. The UK, which had been one the countries most respected by Czechs, saw a slight drop in approval ratings in opinion polls after the referendum. Fundamentally though, perceptions of the UK are largely unchanged and the Czechs' positive view of the British has recovered its pre-Brexit level, buoyed by long-held affection for the UK.

Owing to Brexit, both sides emphasise the importance of bilateral ties more frequently, making strong efforts to publicly praise the relationship. The UK, in particular, often underlines that UK-Czech ties are deeply rooted in shared values and historical links that pre-date and extend beyond EU membership. Since the UK's departure from the EU, Czechia considers the UK to be a close partner, with which it shares similar perspectives on many geostrategic, political and economic issues.

As a result of Brexit, the Czech Republic has had to shift its strategic approach at EU level and in its bilateral relations. Since the Czech Republic joined the EU in 2004, the UK has been an important and like-minded partner at European level, strategically and ideologically aligned. The two countries shared a similar outlook on a range of EU policy areas, including deepening the single market, the further liberalisation of global trade, attitudes towards the Eurozone, nuclear power or the transatlantic link in the EU's foreign and security policy. With Brexit, many aspects that were previously dealt with under the EU framework now necessitate direct bilateral negotiations. Paradoxically, this has led to a rapid development of closer bilateral relations with the UK. This shift has not only increased the complexity and speed of Czech diplomacy, but also heightened its reliance on coalition-building within the EU.

Bilateral relations

While relations with the UK are good, they do not have the same level of importance for the Czech Republic as its relations with Germany. Nor are relations with the Czech Republic as important for the UK as its ties with France or Poland. The relationship also lacks the great historical symbolism and high-level institutionalisation that characterise the London-Paris axis, the Czech-German and Czech-Slovak relationships. Relations between the countries run wide rather than deep and are relatively uncontroversial. The general picture is one of successful but quiet and periodic interactions, driven by practical and pragmatic cooperation in various areas of mutual interest.

Despite the exasperation associated with the Brexit negotiations, bilateral relations have become stronger compared to the period of UK membership. It is one of the Czech Republic's most intensive relationships with a third country outside of EU. This intensity is evident across various levels of government – from the frequency and depth of engagements between prime ministers, foreign ministers, interior ministers, and national security advisors, to an increased frequency of mutual visits and phone calls.

This increased intensity results from the UK's move to reinforce its ties with individual EU member states after Brexit. Indeed, a somewhat unintended consequence of Brexit is that it has diluted the acute historical asymmetry of power that had defined the relationship. The UK has always been the larger and strategically, politically and economically much more powerful partner out of the two. The two countries' diplomatic networks and military and other capabilities differ vastly in size. Since Brexit, the UK now relies much more on bilateral ties with individual EU member states that are intended to offset at least some of the loss of contacts, networks and accesses to the EU, and to have influence across

European areas of strategic interest. This shift has transformed the dynamics of Czech-UK bilateral relations, with the UK now taking a highly proactive stance and being the primary driver of initiatives aimed at strengthening bilateral ties.

Support for Ukraine is a key area of bilateral collaboration and reflects a shared commitment to stability and security in Europe and worldwide. Indeed, the Russian invasion of Ukraine has further aligned both countries, as they are both at the forefront of supporting Ukraine. Security and defence more generally is key, and both countries work together to address cyber threats, and hybrid warfare, and to enhance their intelligence capabilities. The British Military Advisory and Training Team for Central and Eastern Europe programme, established in 2000 in Vyškov, continues to be one of the cornerstones of bilateral cooperation in this area. Energy security is another crucial area of cooperation.

Meanwhile, tensions between Czechia and the UK are minimal. Issues such as misuse of the British social system by some Czech nationals and challenges related to the EU Settlement Scheme for Czech residents in the UK do occasionally come up. But they are considered isolated incidents rather than systemic irritants.

The Czech Republic and the UK have concluded two sectoral agreements. The first was signed in May 2022 by Czech Foreign Minister and his British counterpart and addresses future strategic foreign policy and security cooperation. The Statement of Intent covers various areas and current foreign policy issues, including approaches towards Russia (including sanctions against Russia and their UK-EU coordination), China, Indo-Pacific and the Western Balkans, security issues, NATO enlargement and human rights. The Statement of Intent was followed by the declaration to deepen police cooperation in March 2023. This agreement specifically aims to enhance collaborative efforts in combating terrorism, criminal activities, and unauthorized immigration. Another joint declaration was signed in September 2023 by the Czech Minister of Industry and Trade and the British Minister for Energy Security and Net Zero. This declaration centres on cooperation in the development and deployment of small and medium-sized nuclear reactors (SMRs), marking the UK as the first country with which Czechia has such an agreement. In the same month, the Czech and British transport ministries concluded a Memorandum of Understanding (MoU) aimed at enhancing bilateral relations specifically within the rail sector. The MoU aims to enhance both the efficiency and the scope of railway services and infrastructure. There are signs that other Czech ministries in the Czech government are keen to strike similar kinds of agreements.

It is too early for a conclusive assessment of the efficacy and significance of these bilateral agreements and how much they influence practical cooperation and policy alignment in the designated areas. Generally speaking, the bilaterals do no give rise to any legally binding obligations, are not strongly institutionalized, and lack firm enforcement mechanisms. Yet, their flexibility could allow for adaptive and responsive cooperation as issues arise. The Czech government considers these MoUs to be effective instruments. Moreover, it has moved quickly to sign them. The detailed 'Delivery Plan' included in the 2022 Statement of Intent on bilateral cooperation was completed in only one and a half years instead of the three originally envisaged.

Future relations

The Czech Republic's general approach towards the UK tends to reflect a pragmatic, de-politicized perspective, largely independent of the specific composition of the UK government. Given the importance of the UK as a partner, the Czech government strives for strong bilateral relations regardless of which political party holds power in the UK.

Nevertheless, even if not publicly voiced, there is a perception within Czech policy circles that a Labour government in the UK could potentially serve as a more amenable partner, particularly in fostering closer UK-EU ties, which are seen as beneficial for Czechia. However, this expectation is moderated by a cautious recognition that political stances might often shift once in office. The bigger shift could come after the 2025 Czech parliamentary election, which may lead to a more isolationist cabinet, with the populist Babić-led ANO relying on the support of the far-right SPD or even entering into a coalition with far-right parties.

Meanwhile, there are several key issues that the Czech government would like to address with the UK. These are also the main areas where Prague would hope to see enhanced cooperation between the UK and the EU at large. First and foremost, reducing barriers to trade in goods and services remains a central concern. While the Trade and Cooperation Agreement (TCA) has laid a foundation for post-Brexit economic interactions, the Czech government believes there is room for further simplification.

Czechia is particularly keen on streamlining processes for businesses operating across borders, which includes reducing administrative burdens and clarifying regulatory standards. This is particularly true for the car industry, a key sector of the Czech economy with significant exports to the UK. The upcoming TCA review may see Czech engagement in this area to minimize cross-border disruption in TCA provisions. Overall, though, the Czech government considers the implementation of the TCA as generally successful. Czechia is expected to maintain a low profile in TCA review discussions and to support the overall EU position, consistent with its approach throughout the Brexit process.

The Czech government is also keen to intensify collaboration in science, research, and innovation, building on the UK's association with Horizon Europe and Copernicus programmes, announced in September 2023. This is an area in which Czechia considers there is substantial potential for further collaboration.

Last but not least, academic mobility is a key concern. The UK was formerly one of the Erasmus+ destinations most favoured for Czech students and teachers. The UK's decision to stop its participation in the programme has sparked concerns about the future of academic collaboration and exchange. The Czech government would warmly welcome the UK's reintegration into the programme.

Denmark



Sara Hagemann

Background

As the UK electoral contest approaches, the EU is in turmoil after elections to the European Parliament and the ensuing disruption in national politics in several member states. France will have parliamentary elections, and time may be running out for the Chancellor of Germany, Olaf Scholz. Combined with the war in Ukraine, the Israel-Palestine conflict, and the US possibly heading towards a second Trump administration, there is a lot at stake in Europe. At EU level and in national politics, centre parties face challenges across the continent with a shift to the right and in some countries to the far-right.

It is in this light that the Danish government watches the UK election campaign and keenly awaits the result. Historically, Denmark has been a <u>close ally</u> of the UK on EU and global matters, and Denmark hopes that a change of the UK government on 4 July will result in a new phase for EU-UK relations post-Brexit and a re-connection of London to the European continent. Such an approach would build on the pragmatic path taken by Rishi Sunak, as compared his predecessors, which was illustrated by his push to resolve the impasse over the Protocol on Northern Ireland in 2023.

Still, no one in Denmark will be holding their breath on 4 July. There is little optimism following the experience of the last five UK premierships and especially of the Brexit negotiations, which have left relations bruised and expectations low among both diplomats and stakeholders in the private sector. The 2024 elections in the UK will not draw nearly the same level of public attention in Denmark as it did in 2017 and 2019 when political and economic post-Brexit interests of significance for several Danish industries were still being worked out. While figures are currently improving, import and export markets have taken a significant hit due to the new border and rules governing trade (see Figure 1), and many companies in Denmark chose to redirect their sales to continental Europe as a result of the Brexit outcome (Statistics Denmark, 2022)

Figure 1 Denmark: Trade with the UK 2011-2022

Source: Danish Trade Council, 2024

Yet, the bottom line is that, while Brexit was a significant set-back to Danish interests, the economic impact of Britain's decision to leave the EU were concentrated in a few industries. Agricultural and agribusiness producers and the Danish fishing industry suffered, as did the large logistics sector. But the Danish government made a considerable effort to prepare and cushion the blow to the industries most affected by managing expectations and providing compensation from Brexit.

The most significant effect of Brexit for Denmark is therefore not the economic consequences it has had for Danish trade, but rather the political and longer-term impact of UK's absence from an EU at a time of upheaval. Denmark must now navigate a very difficult political reality. Danish politicians and diplomats often have to direct their attention to several capitals in order to have influence EU affairs. The connection to Berlin is particularly important. But coalitions and alignments in the EU are never permanent, with decisions formed on an ad hoc basis rather than more permanent alliances in the European Council as well as in the Council of the European Union.

Relationship with the EU

Denmark entered the EU at the same time as the UK in 1973 and, similarly to the UK's previous position within the EU, its core interests as a member state have been the single market and geopolitical developments in Europe. These priorities are amplified by the economic and geopolitical challenges of recent years.

Denmark is highly dependent on its European neighbours. Trade with the EU accounts today for 55.5 per cent of Danish exports (87 billion pounds in goods, 51 billion pounds in services) and 66.4 per cent of imports. Britain, by contrast, is Denmark's fourth largest trading partner with six per cent of goods exports and seven per cent of services, mainly in the areas of agriculture/agribusiness, renewable energy technologies, and chemicals (including pharmaceuticals). UK exports to Denmark amounted to 8.6 billion pounds in 2023, with imports at 8.9 billion pounds.

Despite its dependence on the EU economically and politically, Denmark like the UK has historically voiced reservations over the EU's direction of travel. After the rejection of the Maastricht Treaty in a 1992 referendum, Denmark negotiated opt-outs in the core areas of security and defence policy, the Eurozone, and justice and home affairs. However, Eurosceptic voices in Denmark have faded in recent years. In a referendum in 2022 in the aftermath of the Russian invasion of Ukraine, the opt-out in security and defence was overturned, and after Covid and with the current geopolitical challenges that Europe faces, support for EU membership is at a record 88 per cent. Brexit further served to sharpen a common understanding of what actually is at stake if EU membership is denounced. Neither the Danish public or even Denmark's Eurosceptic parties entertain the idea of leaving the EU.

Future relations

Denmark continues to share many interests with the UK, both on the global front and in European matters, and it liaises bilaterally with the UK in various international bodies. Denmark is an active NATO and UN member, with newly minted temporary membership of the UN Security Council, and is militarily present in several international conflict zones at a scale which some consider disproportionate to its population size and geopolitical role in international affairs.

The Danish prime minister, Mette Frederiksen, <u>said recently</u> at an event in Copenhagen that it was her great hope that Britain would move closer again to its European partners after the July elections. As Frederiksen's social democratic party suffered a historical blow in elections to the European Parliament, and public opinion is critical of their performance in national politics, the prime minister would personally welcome an incoming Labour government in an otherwise centre-right/right-wing dominated Europe. Her diplomats also expressed a hope for a next British prime minister to start a new chapter and restore the UK's reputation for reliability and commitment to Europe.

The Danish government will closely monitor any early signals from the next prime minister on whether further steps can be expected and if the UK will change its position to engage with the EU as a bloc rather than insist on a continuation of the bilateral system, which has been in place since the Johnson government. For Denmark it matters greatly for the EU to act as a bloc, and for the UK to acknowledge and engage with Brussels. Nevertheless, Copenhagen knows that it will have to take things as they come, and even in the best scenario both Denmark and the UK will have to take things step-by-step in order to ascertain commitments along the way.

Certainly, the political agenda ahead is packed with issues where interests of the two countries are closely aligned, and where Denmark would greatly welcome the UK's voice and closer collaboration. To name but a few: sustained military and political support to Ukraine, wider defence and security (including on cyber security and new types of warfare, energy security, food, water, environment), internal security and terrorism, climate change and environment, migration, refugees, dealing with Turkey, handling the Middle East, science and technology, and potentially even diplomatic engagement with illiberal politicians and governments in Europe itself. In June 2023 then Foreign Secretary James Cleverly and Danish Foreign Minister Lars Løkke Rasmussen signed a Joint Statement which sets out some of these shared interests and the intention to work closely together to find common solutions – with an emphasis that this must be done '... with full respect for Denmark's obligations as an EU Member State'.

Based on this, the Danish government is already looking for details from the UK shadow secretary of state for foreign affairs, David Lammy, on what a future Labour government's positions might be, with a number of scenarios being considered. An immediate concern for Denmark is the growing pressure for the EU to find financial mechanisms to strengthen its engagement in Ukraine. For the first time, Denmark is considering its position on common defence bonds and loans based on frozen Russian assets — a significant change in the EU financial and budgetary system and a dramatic change in Denmark's position on the use of EU bonds, since Denmark is one of the so-called frugal countries that include Germany, the Netherlands and the Nordic members worried about the EU federalising its finances. The move reflects the gravity of the situation in Ukraine and Danish foreign minister Lars Løkke Rasmussen's cautious rhetoric around the issue shows how difficult a dilemma this poses for Denmark. The UK's views on how the EU decides to approach these issues, as well as its own actions on advancing efforts in Ukraine, will be closely observed and considered in any new policy approaches in Copenhagen.

Trade relations with the UK of course also remain important for Danish industries and the Danish government. Agriculture, agribusiness, renewable energy technology, logistics sector, pharmaceuticals, and other large Danish businesses have continued to find ways to trade and collaborate with UK partners post-Brexit, and Denmark hopes that conditions can be further improved with a new Labour government in place.

But to Denmark there is no question about what can be offered to the UK when it comes to trade and the UK's formal association with the EU. Despite its great reliance on, and alignment of interests with the UK both in the past and today, Denmark was an <u>unwavering hardliner</u> during the Brexit negotiations and can be expected to similarly keep a stern line in any renewed agreements with the UK. In short, Denmark wants the EU to keep the UK as close as possible, but vocally insists that single market access requires a 'level playing field' with no exceptions for Britain which could result in unfavourable competition or risk the unity of the EU27. From Denmark's point of view, the risk of undermining the European social and economic model is simply too high, since its own market position and advanced welfare model could be put under threat.

Yet, Denmark is very much in favour of finding solutions and getting the UK closer to its neighbours, and a new government in the UK may find their smaller and diplomatically savvy ally to be a useful player in reestablishing connections with Brussels. Danish prime minister Frederiksen has suggested that Denmark may support furthering the status and actual work of the European Political Community (EPC), where the EU27 member states meet with 20 external countries, including the UK, around strategic interests in an informal, unrelated setting to the EU.

From a Danish perspective, there is no question that there is an urgent need for the UK to re-engage in politics in Europe. The question in Copenhagen is: will the next British prime minister step up to the task?

France



Pauline Schnapper and Cleo Davies

Background

The UK's decision to leave the EU was a shock to France, in spite of the two countries' sometimes divergent views about European integration. Britain and France are not only close neighbours linked by the Channel Tunnel, but they have developed strong bilateral links at all levels. As well as important trading relations – France is the UK's fifth trading partner and the UK is France's seventh – about 300, 000 citizens of each country reside in the other. They have also increased political and military links in the last few decades. In particular, the Lancaster House agreements signed in 2010 institutionalised defence cooperation, covering both the conventional (in procurement and with the creation of a combined joint force) and nuclear fields.

The French governments under presidents François Hollande and Emmanuel Macron regretted the decision of the UK to leave the EU and choose a different geostrategic path. Yet they were also keen to protect the interests of the EU and France in the process. They supported the Commission's strong stance on 'cherry-picking' in the single market and on the Irish border, while attempting to attract jobs in financial services to Paris and protect French fishers affected by Brexit.

The immediate consequences of Brexit on trade between France and the UK are difficult to disentangle from the effects of the Covid 19 pandemic, but trade fell by 14 per cent between 2018 and 2021 according to the French office for statistics, then picked up in 2022 and 2023 (+18 per cent). Small and medium companies have been more affected by the new paperwork needed to export goods than larger ones, who can afford to dedicate staff to the task. The end of free movement, meanwhile, has become a major impediment to citizen mobility and rights, and also means additional paperwork and border checks for businesses .

Defence cooperation was always intended to be bilateral. The planned combined joint expeditionary force (CJEF) reached full operating capability in 2020 and defence industries continued to cooperate on missile programmes. But the political will lapsed for a while and France turned to Germany for new procurement programmes after 2017, including next generation or SCAF aircraft and Main Ground Combat System (MGSC) tanks and drones. Unlike the UK, France views its sovereignty as enhanced, not diminished, by EU membership. Brexit was one element among others – the unreliability of US security guarantees under Trump, the changing broader geopolitical landscape and the industrial weaknesses revealed by Covid – which encouraged France to seek to develop more European 'strategic autonomy', a term used in the EU's 2016 global strategy document but ubiquitous in the French president's rhetoric since his <u>Sorbonne speech</u> in 2017.

Bilateral relations

The current bilateral relations between France and the UK are strong again today after a deterioration between 2017 and 2022. The difficulties were linked to the tensions throughout negotiations between the EU and the UK, problems around licences for French fishers in UK waters and small boats, the fallout over the AUKUS deal (an agreement between Australia, the UK, and the US, which ended a deal between Australia and France on submarines), as well as a breakdown in personal relations between president Macron and prime minister Johnson. The change of prime minister in the UK in 2022 and the Windsor framework agreed with the European Commission on behalf of the EU paved the way for a reset in the relations and the first UK-France bilateral summit in March 2023 after five years. At a ceremonial level,

the strong relations were also symbolised by the state visit of King Charles III to France in September 2023, which he initially chose as his first, the <u>celebration</u> of the military relationship at the Trooping of the Colour for the King's birthday and, most recently, the <u>series of events</u> around the 120 years anniversary of the Entente Cordiale.

Again, following the post-Windsor Framework thaw in EU-UK relations, prime minister Rishi Sunak and president Emmanuel Macron signed a lengthy joint declaration at the March 2013 bilateral summit. The text envisages cooperation in a wide range of areas: Ukraine, the European Political Community, defence and security, fight against organised crime, cyber and hybrid threats, terrorism, foreign policy, decarbonisation and energy, illegal migration, and social and economic ties. Following the summit, the UK and France have worked on implementing these pledges. They have signed a number of sectoral joint statements to deepen cooperation, which create opportunities for meetings at ministerial level (Climate and Nature Finance Mobilisation; Energy cooperation; Cooperation on Civil Nuclear Energy; Science, Innovation and Technology) and eased rules for school visits. France and the UK have also signed treaties on Maritime Security and on the operation of the Channel Tunnel Link.

Moreover, building on previous bilateral <u>agreements</u> such as the <u>Sandhurst Treaty</u> of 2018, the March 2023 declaration makes provisions for tackling and managing migration in the English Channel through a multi-annual operational plan and joint-funding arrangements. The UK committed 541 million euros for the 2023-2026 period to fund further deployments of 'law enforcement' personnel in France and surveillance aircraft, and a new retention centre. UK liaison officers are permanently based in the North of France. Both parties have since <u>committed</u> to deepening and accelerating cooperation to tackle migration crime, including through the work of the <u>Groupe de Calais</u>, which gathers neighbouring countries and the European Commission. It includes France and the UK <u>leading</u> on a 'customs' partnership' to disrupt the supply of small boats. But, since leaving the EU, the UK can no longer use the EU framework to send migrants who arrived illegally in the UK back to France.

More broadly, despite their breadth and depth, bilateral relations cannot entirely compensate for the friction in mobility or in trade that have occurred as a result of Brexit.

Finally, and in line with the March 2023 declaration, the two countries work together to promote multilateral cooperation. They co-hosted an international conference that launched the <u>Pall Mall Process</u> to fight commercial cyber crime, and cooperate through the European Political Community summits. Both France and the UK have been steadfast in their calls to support Ukraine's fight against Russia, recently reiterating their unwavering support to Ukraine and the need to defeat Russia in a <u>joint op-ed</u> by their respective foreign ministers.

Future relations

The current French government would expect to build on the improved bilateral relation established under Rishi Sunak with a possible future Labour government. Keir Starmer met president Macron in Paris in September 2023 and informal contacts have been established between the Labour foreign policy team and the French embassy in London. Paris looks forward to David Lammy's aim to return to a more pragmatic and less ideological posture towards Britain's European allies, a process that was already started under Rishi Sunak. What Labour's pledge to 'reconnect' would imply practically remains somewhat unclear in the French eyes.

The government would welcome a more formal security agreement and structured dialogue between the UK and the EU, as mentioned by Labour, especially in the context of the Ukraine war. But there are limits to what can be achieved, even in this consensual area. French officials stress that the UK post-Brexit is less of a priority than developing European strategic autonomy, from which the UK as a non-member state would be excluded. Similarly, the French government has been one of the strongest advocates of EU defence procurement to be limited to EU member states and EEA states, thereby leaving the UK out.

The Labour party signalled its intention to revise the TCA to reduce friction in trade and strengthen mutual recognition of qualifications and standards while staying out of the single market and customs union. This is not something that the French government would necessarily support, not just because it has other priorities within the EU – such as the next round of enlargement – but because it remains wary of British 'cherry-picking' and the divide-to-rule strategie that the UK attempted during the Brexit negotiations. Post-Brexit mistrust between the two countries, whilst much lower than under Boris Johnson, has not been completely eliminated.

However, with parliamentary elections now taking place in France, political instability is a strong probability. Following president Macron's surprise dissolution of the French National Assembly, the centre-ground coalition government, already in a minority in the previous legislature, may be further weakened or even replaced by a government led by the extreme right or the left. Whatever the outcome of the elections on 7 July 2024, the consequences are likely to make bilateral relations with the UK even less of a focus for France.

Germany



Eva Heidbreder and Nicolai von Ondarza

Background

Germany reacted with scepticism and regret to the 2016 UK referendum. For Berlin, Brexit was a 'lose-lose' situation. Initially, the German government regarded a 'cliff-edge' or no deal Brexit as a real possibility and it prepared for such an eventuality. Negotiations were handled as a kind of reverse accession process, with strong emphasis on an orderly, legally sound exit that protected the single market. These general lines – prioritisation of the EU's shared interests, and no 'cherry picking' – remain preeminent. The legal uncertainty concerning the Northern Ireland Protocol was perceived very negatively in Berlin. The adoption of the Windsor Framework (2023) came as a great relief both to politicians and business in Germany, since it finally settled the formal relationship with the UK.

Notwithstanding its firm approach to the Brexit negotiations, <u>Germany considers the UK</u> an important partner, and wants enduring cultural, societal and economic relations, especially in the G7 and NATO. Germany has a strong preference for multilateral, institutionalised relationships and has made it explicit that any bilateral understandings with the UK should not conflict with any EU objectives. Whilst a number of line ministries have established bilateral arrangements, the so-called structured dialogue format is the exemplar for relations between Germany and the UK relations. The <u>Joint Declaration of Intent</u> on UK-German foreign policy cooperation (2021) spells out a detailed shared agenda, and the meeting in Berlin in March 2024 centred exclusively on the question of German arms deliveries to Ukraine, a highly politicised issue in Germany at the time.

Following Brexit, there has been a significant decline in bilateral trade and cultural and societal exchange, leading to the rather bleak assessment that 'among Berlin's political class, <u>Britain has simply fallen off the mental map</u> of countries that matter for Germany'. Soon after taking office, German chancellor Scholz made inaugural visits to Paris, Brussels, and Warsaw, first, then Rome, Madrid and Washington, and only after did he travel to London. On the UK side, Rishi Sunak travelled to Berlin a year and a half after taking office.

Meanwhile, the leader of the UK opposition Labour Party, Keir Starmer, has met the German Chancellor several times, but without attracting the same level of publicity as the meetings between Starmer and Macron. The state visit of King Charles III in 2023 was symbolic and successful, but has not led to any deepening of the political relationship between the two countries.

Bilateral relations

Four years after Brexit, there has been a gradual normalisation of bilateral relations. The relationship between the two countries appears to have stabilised, albeit at a lower level of intensity. The normalisation has taken the form of a series of bilateral understandings between the two governments. Typically led by individual ministries, however, they do not yet amount to a comprehensive strategy towards the UK on Germany's part.

The first Brexit-related bilateral was signed in 2018 in the form of a <u>Joint Vision Statement</u> on defence cooperation by the then German defence minister Ursula von der Leyen. The follow-up has been limited so far, although Germany and the UK continue to work well together on defence issues within NATO. The UK, unlike France and Poland, also joined the German-led <u>European Sky Shield Initiative</u>. This echoes the long-standing shared preference between the two countries for <u>NATO over EU defence capacity development</u>, which contrasts to <u>diverging German-French security</u> approaches.

On broader foreign and security policy cooperation, Germany was amongst the first European countries to sign a bilateral understanding with the UK after Brexit, in the form of <u>Joint Declaration on Foreign and Security Policy</u> in June 2021. The document stresses the common interests, values and priorities of the two countries. At the same time Germany pressed for inclusion of a statement that the envisaged cooperation would not undermine the EU. In addition to long existing bilateral formats, such as the yearly <u>Königswinter Conferences</u>, an annual 'Strategic Dialogue' 'on all matters of foreign policy and international affairs' was agreed. Two of these have taken place so far: the first in January 2023, the second in March 2024.

Even though concrete outcomes of the strategic dialogues are hard to measure, the first two meetings did not result in discernible initiatives. More noteworthy was a joint op-ed by foreign ministers, David Cameron and Annalena Baerbock, on the conflict between Israel and Hamas calling for a 'sustainable ceasefire in Gaza'. This was particularly remarkable as Germany's position at the time was closer to the UK than to many EU countries, which were deeply split on the issue. The British foreign secretary is still one of the regular contacts of the German Foreign Minister.

Most recently, the German minister for economy and climate, Robert Habeck, has signed a <u>Joint Declaration of Intent</u> on establishing a UK-Germany hydrogen partnership with his British counterpart, to deepen cooperation in energy transformation. In the same vein, Germany has pushed for re-admitting the UK to an <u>MoU on Off-Shore Wind</u> as part of North Sea Energy Cooperation. Despite these examples, normalisation has taken place at a relatively low level and does not appear to be a priority in the overall framework of German bilateral relations. For example, in its first ever <u>National Security Strategy</u>, adopted in 2023, the German government names France and the United States as its two essential partners. The UK – and Poland, the Netherlands and other allies – are left out altogether. By contrast, the <u>UK Integrated Review</u> Refresh refers to Germany as an 'essential ally'.

Even though Germany consistently emphasizes its preference for multilateral over bilateral relations, there is limited enthusiasm in Berlin for the European Political Community (EPC). Viewed essentially as a French project, the German government was keen to ensure that the EPC would not develop into an alternative to EU enlargement. Although the first meetings (2022, 2023) were seen as useful for informal exchanges, the EPC is not considered to be an essential part of any future European security architecture. Berlin is also sceptical of the UK's push to make migration a large topic at the EPC, in particular when the UK hosts the summit in July 2024. As the EPC summit now takes place after the UK election, it might be used by Germany – amongst others – for an early bilateral meeting with the next UK prime minister.

In trade, the UK remains a <u>significant partner</u> for Germany and is still the third largest recipient country for German net exports. However, trade between the two countries fell continuously between 2015 and 2023. From its position as Germany's fifth most important trading partner in 2017, the UK dropped out of the <u>top 10</u> trading countries in 2022, but had slightly by 2024 – with the important caveat that 2023 saw an unprecedented increase of non-monetary gold to the UK, a gold-trading centre. Gold <u>accounted</u> for 5 per cent of German-UK exports, but is not linked to the real economy.

German business interests are directed towards growing off-shore wind energy, the private health care market and infrastructure projects. The UK market remains highly relevant to the export-dependent German economy. Export gains, especially with the automotive sector picking up again, also account primarily for the bounce-back of German-UK trade. Business does still regard Brexit as a problem, however, especially due to strict UK emigration legislation that impedes dispatching employees and services to the UK. During the Brexit negotiations, supported the EU's approach to put the single market first and opposed special rules for the UK.

The Windsor Agreement was extremely important for the economic relationship between the two countries. German politics often views EU and international relations through a rules-based prism. The willingness of the UK government to unilaterally break its commitments under the Withdrawal Agreement was viewed with outrage in Berlin and greatly damaged trust. That trust has now largely

(but not completely) been restored by the Windsor Agreement. A change of government in the UK could further deepen confidence, even if it will not subvert Germany's 'red lines' about EU-UK cooperation, notably, concerning the single market.

Links between British and German civil society remain strong, in particular at person-to-person level, such as youth exchanges. A <u>UK-German Cultural Commission</u> issued a joint statement in 2023 underlying the relevance of multidimensional links. Yet, overall there has been a decline in interest in the UK. A <u>significant drop</u> was recorded in the number of German students enrolling in UK universities – <u>almost</u> 14,000 in 2017-18 and fewer than 10,000 in 2021-22. <u>UK students</u>, meanwhile, are not substantially present in the increasing number of foreign students in Germany.

Although a survey commissioned by the German Embassy to the UK in September 2023 reflects predominantly positive views of UK citizens towards Germans, and even though Germany continues to be seen as an important international partner, one third of the respondents <u>believe</u> that the countries' relationship has deteriorated due to Brexit. There is no comparative study polling current German perceptions, but media reporting in 2023 referred to a considerable decline in tourism from Germany, explained in particular by less favourable views held on the UK, according to the <u>Anholt-Ipsos National Brands Index</u>. For Germans, the UK dropped from seventh place as a destination in 2016 to eighteenth in 2023, with a remarkable decline from twelfth to thirty seventh place concerning the perception of being 'welcomed'.

Similarly, immigration <u>has decreased</u> after a Brexit-related higher mobility phase, especially between 2017 and 2020. Immigration from the UK to Germany increased over this period, peaking in 2019 at 21,460, while emigration from Germany to the UK dropped to a low of 13,886 in 2020. In 2021 and 2022, the number of emigrants to the UK (15,000-16,000) was higher than the number of immigrants from the UK (13,000-14,000) for the first time since 2014 (19,234). In sum, the movement of people appears to have stabilised at lower levels than before Brexit.

Future relations

Looking ahead, Berlin is cautiously optimistic that, after the UK general election, the two countries will be able to build upon recent improvements in the bilateral relations. Noticeably, there is not much public discussion in Germany about the UK election and its possible outcome, the US presidential elections and the potential return of Donald Trump is a regular feature of German media discussion – like the 'parliamentary wars' over Brexit in 2018-2019. Equally, the French snap elections in summer 2024 and their potential outcome are a much greater concern.

Even though if there are tentative hopes for closer cooperation with a Labour government, for example, in <u>defence</u>, the German position on the future UK-EU relationship remains the same as over the course of the Brexit negotiations: the UK is an important partner, but also a third country. The 'red lines' defined during the Brexit negotiations are unchanged. The upcoming review of the EU-UK Trade and Cooperation Agreement (TCA) is viewed as more of a technical exercise, unless a new government in Westminster were to significantly shift UK 'red lines' on entry to the single market or membership of the customs union. Equally, Germany will continue to address EU-related issues, such as mobility, at EU level.

A major exception is the area of foreign, security and defence policy. In particular in light of the potential return of Donald Trump as US president, Germany is open to deeper cooperation with the UK in this field, at both EU-UK level and bilaterally. Here a potential change of government might also make a difference. MPs from the SPD and Labour have already spoken about deepening security cooperation, and Labour — and the Tories too — have included a Lancaster House-style treaty with Germany in their manifesto. A far-right victory in the French parliamentary elections could also increase the importance of stronger relations between Berlin and London.

It also remains an open question whether normalisation of relations at a low level will be enough to improve relations, whether they are destined to become politicised at some stage, or whether follow-up will be limited. Education and labour mobility have become more difficult, the regularity of political exchanges has decreased, and newly institutionalised meetings, such as the Strategic Dialogue, have not really taken root. As the links between the societies are so deep, there are many possibilities for strengthening the relationship in the future. But deepening will require a conscious and concerted effort from both sides.

Greece



Spyros Blavoukos¹

Background

Greece and the UK have long historical ties that stretch back to the early nineteenth century when the Hellenic Kingdom was first established. The British Empire was one of the great powers which came to support the Hellenic revolution against the Ottoman Empire. In the twentieth century, Greece and Great Britain further cemented their ties when they fought together in both World Wars. However, UK interference in the Greek civil war, and its objection to the union of Cyprus with the Hellenic Republic in the 1950s and 1960s, caused negative sentiment towards the UK in Greek society. Since 1974 and the restoration of democracy in Greece after the seven-year dictatorship, relations between the two countries have been stable and amicable.

When a potential UK exit from the EU first appeared in the British public debate in the early 2010s, it was framed in Greece through the prism of the country's own very fraught relations with the EU. At the time and throughout the period up to the June 2016 British referendum, harsh fiscal consolidation measures were still causing major political turbulence and societal turmoil in Greece. Even though the UK had failed to support Greece in bailout negotiations, Brexit was framed more as a consequence of EU power politics, coupled with anti-German sentiment and dissatisfaction with EU policies, than as an outcome of British politics.

In policy terms, three areas were of primary concern for Greece regarding Brexit and its impact: tourism, tertiary education and migration.

Tourism is a vital industry for the Greek economy, accounting for nearly one-fifth of the country's GDP and employing over 900,000 people in 2023. In 2016, Greece was one of the most popular destinations for British citizens who accounted for almost 10 per cent of the total number of visitors. The UK's departure from the EU was expected to create obstacles to travel because of border controls and possibly visa requirements. Although the Greek authorities were worried that the country's tourist industry would have to compete with other destinations outside the EU, such as Turkey or Egypt, the threat did not materialise. Setting aside the Covid-19 interlude, more British tourists have visited Greece since Brexit (Figure 1) and their share of the total number of tourists travelling to Greece has increased too (Figure 2).

Figure 1

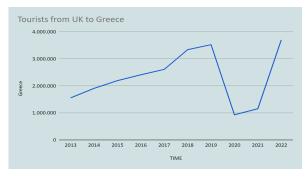
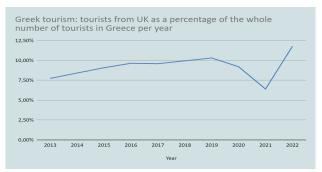


Figure 2



Source: Eurostat Source: Eurostat

The second issue was the situation of Greek students in the UK. Before Brexit, UK universities were the first destination for Greek students. In 2015 Greeks were the <u>eleventh largest national group</u> with

^{1.} I would like to thank Stamatis Stasinos for his research assistance and diligence in finding the data that support this contribution.

9,790 students. There were concerns that uncertainty in the status of these students in the interim period post-referendum would lead to an exodus if they were suddenly liable to pay international tuition fees. However, the number remained relatively stable between 2016-21. This trend was reversed in the 2021-2022 academic period, the first under the new system, in which a big drop was noted. Given the Covid pandemic effect, it is difficult to fully account for this approximately 30 per cent drop by sole reference to Brexit. In any case, it is important to note that in the same year there was an almost 60 per cent decrease in the number of first-year students enrolled in British universities compared to the 2019-20 (pre-Covid) and 2020-21 academic years. This figure is higher than that of almost all other EU member-states.

Greek students in the UK and their growth rate per year Greek students in the UK Growth Rate 12.500 10,00% 10.000 0.00% 7.500 -10,00% 5.000 -20,00% 2.500 -30,00% 2016-2017 2019-2020 2020:2021 -40.00% 2017-2018 2018-2019

Figure 3

Source: Universities UK & British Council

The third area of concern for Greece was the <u>residency status</u> of Greek citizens in the UK – approximately 54,000 in 2015 – in case of no agreement. This number substantially grew with more than <u>135,000</u> applying for settled status by September 2021, according to data from the EU Settlement Scheme. <u>Estimates by the Hellenic Ministry of Foreign Affairs</u> were even higher, raising the number to more than 170,000 Greek citizens residing in the UK at the beginning of the new period in EU-UK relations. This increase is a direct administrative and bureaucratic corollary of Brexit. Before Brexit, Greek citizens moved and worked freely in the UK, mostly without any need to acquire residence status taking advantage of their status as EU citizens. After Brexit, they have to claim settled status under the EU-UK Withdrawal Agreement, thus becoming visible and officially registered and counted.

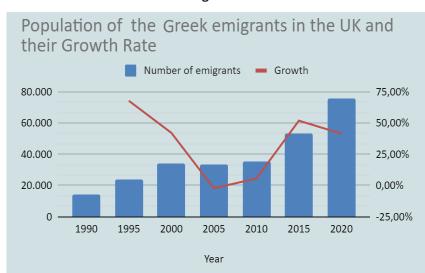


Figure 4

Source: Our World in Data

During the negotiations, the Hellenic government prepared for Brexit by incorporating the EU-UK Withdrawal Agreement into the Hellenic legal system, covering such areas as citizens' rights and custom procedures. The ministry of foreign affairs (MFA) organized a campaign to raise awareness across all ministries to prepare the public administration and set out to inform civil stakeholders affected by the UK's departure from the EU.

Bilateral relations

In November 2021, Greece and the UK <u>signed</u> a comprehensive Memorandum of Understanding (MoU) that covers digitalisation, education, trade, maritime affairs and other sectoral issues, as well as foreign policy, security and defence. The MoU includes a common approach to Cyprus, the Eastern Mediterranean, the Western Balkans and the Middle East. It reaffirms the two countries shared perspective on, and interest in the stability in the Eastern Mediterranean, grounded in international law, including the Law of the Sea (UNCLOS). This is especially important for Greece, given the country's long-standing advocacy of the use of international law to counter Turkish expansionism in the Aegean Sea and beyond. In addition, the UK committed its support for Greece's candidacy for a seat on the UN Security Council, a campaign that ended successfully in June 2024 with Greece's election as a non-permanent member for 2025-26.

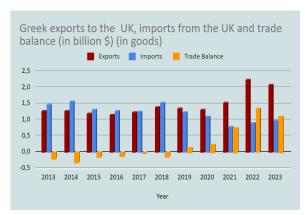
Beyond the MoU, Greece and the UK have adopted a common stance on the Russian invasion of Ukraine, condemning Russia and providing Ukraine with military and financial aid. Both also <u>strongly supported</u> Israel in the early stages of its response to the terrorist attack on 7 October 2023, although Greece has become more critical of more recent phases in the military operation.

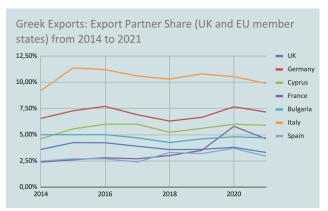
In security and defence policy, the two governments signed a <u>Joint Vision Statement</u> (JVS) early 2023. They agreed to develop an annual 'roadmap', outlining their priorities and ways to strengthen collaboration on defence industry and to increase cooperation on issues such as hybrid warfare and cybersecurity. Based on the provisions of the JVS, British and Greek armed forces have completed several joint exercises and training courses. Whilst this bilateral agreement is not comparable to the depth of collaboration on defence and security between Greece and France, it is nonetheless a significant development.

In education, and in response to the declining trend of Greek students enrolled at British universities, the Hellenic Ministry of Education and Religious Affairs and the British Embassy in Athens signed a <u>Strategic Partnership in Education</u> in April 2021. The partnership aims to increase collaboration at the tertiary level, particularly in the fields of research, as well as in joint and dual study programs.

In terms of trade and investment, bilateral trade flows have increased post-Brexit, notwithstanding the pandemic. In 2018, the UK was eighth for Greek exports and the thirteenth biggest exporter to the Hellenic economy. By 2023, Greek exports to the UK had surged in value and Greece has had a positive trade balance with the UK since 2019 (Figure 6). Compared with its other main European trade partners, Brexit does not seem to have upset UK trade relations with Greece (Figure 7). Greek exports to, and imports from the UK remain constant percentage wise at approximately 3.5 per cent and 2.4 per cent of the total Greek trade flows respectively.

Figure 6 Figure 7



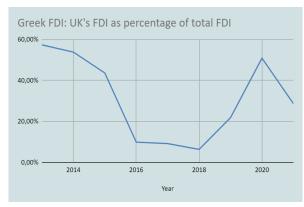


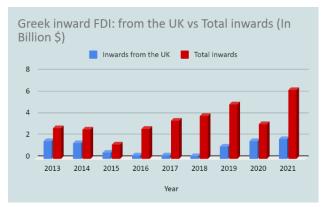
Source: Trade in Economics

Source: World Integrated Trade Solution

British Foreign Direct Investment (FDI) to Greece plummeted during the Greek economic crisis but has <u>recovered</u> since 2018 (Figures 8 and 9). In general, British investors have a preference for Greek government bonds, with a <u>21 per cent stake</u> in these bonds at the end of 2023.

Figure 8 Figure 9





Source: UK Department for Business and Trade & Statistics

Future relations

No major changes are expected in the event of a change of government in the UK. In trade and economic relations as well as in the field of foreign and security policy, the two sides have shared views and approaches to the main issues on the regional and international agenda. On security, both countries are keen to deepen bilateral defence cooperation. Moreover, the Greek government is seeking to push forward on signing two MoUs with the UK on tourism and education respectively. Hence, there are clear prospects for a closer and deeper bilateral relationship.

The only point of friction that could affect the bilateral relations following a change in government in the UK is the future of the Parthenon sculptures, currently exhibited in the British Museum. The claims that the British diplomat Lord Elgin had been authorised by the then-ruling Ottoman Empire to remove the sculptures from the Parthenon are widely contested and all Greek governments have called for their return. As an illustration of its continued sensitivity, the Greek prime minister and the British prime minister had an open dispute on the issue in November 2023, leading to the cancellation of their bilateral meeting only hours before it was due to take place in Downing Street.

Ireland



Brigid Laffan

Background

Ireland and the United Kingdom are near neighbours that share a long, complicated and contested history. The establishment of the Irish state in 1922 was the result of repeated rebellions against Britain's presence on the island of Ireland. Independence came at the cost of the partition of the island into the new Irish state and Northern Ireland that remained part of the United Kingdom. That partition left a sizeable nationalist minority trapped in Northern Ireland, with the result that the border between the two parts of the island remained contested. At the end of the 1960s communal conflict broke out in Northern Ireland. This conflict, known as The Troubles, was violent and involved the stationing of British troops in Northern Ireland. The UK's and Ireland's joint membership of the EU in 1973 offered both states an arena to forge a new and more cooperative relationship, notwithstanding the conflict in Northern Ireland, and it weakened the asymmetric relationship between the larger UK and Ireland as a small state.

From the end of the 1960s onwards there were repeated attempts involving both governments to end the conflict in Northern Ireland. This was achieved in 1997 with a negotiated settlement known as the Good Friday Agreement (GFA) that provided for new political and policy institutions involving devolved authority within Northern Ireland, North-South bodies between the two parts of Ireland, and East-West bodies to represent the totality of relations across all of the various jurisdictions engaged in the governance of the two islands. The Agreement brought the violent phase of the conflict to an end and moved it into the political arena. Joint membership of the EU facilitated the improvement of relations between London and Dublin and the Good Friday Agreement together with the European internal market rendered the border in Ireland largely invisible. There were different currencies used on either side of the border and the road signs were slightly different, but to the communities living on the border, life returned to peaceful coexistence and normality.

The decision by David Cameron to put the question of EU membership to the UK electorate in 2016 was met with dismay in Ireland. It was understood that if the UK opted to exit the EU, the consequences for the island of Ireland were serious and potentially destabilising. Since it is the only EU member state to share a land border with the UK, Ireland was inevitably going to experience the consequences of Brexit in a far more acute manner than any other remaining member states. When the result of the referendum became clear on 24 June 2016, the Irish system swung into action and published the first Brexit contingency plan. For Dublin, Brexit was existential and hence the government adopted a 'whole of government' approach in response to the decision. This involved thorough assessment of the likely impact of Brexit on Ireland, engaging with economic actors and wider civil society, and ensuring that Brussels and the other member states were fully cognisant of the consequences of Brexit for Ireland, especially in relation to the border on the island of Ireland.

The signing of the Good Friday Agreement and the landmark visit by Queen Elizabeth to Ireland in 2011, had led to a normalisation of British-Irish relations and the prospect of warm and close relations for the foreseeable future. Brexit was a major shock to the relationship as it disturbed territorial relations within the UK – Northern Ireland together with Scotland voted to remain in the EU. The degree of strain in the relationship from the referendum onwards should not be underestimated because the most difficult issue for the EU and UK in the Withdrawal Agreement negotiations was how to handle the Irish border. The shared aim of the UK and the EU was to ensure that there was no return to the borders of the past, but that was incompatible with the UK's desire to 'take back control' and leave the single market and the customs union. The response to this incompatibility was the development of a Protocol on Northern

Ireland that would effectively keep Northern Ireland within the EU single market and de facto in the customs union. This solution almost derailed the Withdrawal Agreement negotiations in December 2017 and the Protocol was the most contested issue in the failed ratification of the Withdrawal Agreement negotiated by Theresa May.

During his bid for the leadership of the Conservative Party in 2019, Boris Johnson campaigned on a platform to abolish the Protocol. The EU was however insistent on a legally operational system for its external border but agreed to substitute the backstop with a frontstop, which essentially created a sea border between Northern Ireland and the remainder of the UK. This was anathema to the Unionists for whom Northern Ireland's place in the UK is an essential marker of identity and legitimacy. The Irish border continued to bedevil the relationship between London and Dublin and also between Brussels and London right through the completion of the Withdrawal Agreement and the negotiation of the Trade and Cooperation (TCA).

Bilateral relations

The UK left the EU on 31 January 2020 which brough the implementation of the special arrangements for Northern Ireland into sharp relief. As long as the Protocol and its implementation remained contested and problematic, relations between London and Dublin would be difficult and tense. The implementation of the Protocol led to direct and vocal opposition from the Democratic and Unionist Party (DUP), the largest Unionist party in Northern Ireland. It became a matter of high politics when the DUP issued a Statement on 2 February 2021 entitled 'Free us from the Protocol'. In addition, the day-to-day effects of the protocol on exchange between Northern Ireland and the rest of the UK were major irritants for people living in Northern Ireland.

The Dublin government was vigilant during this early period but left the challenge of implementation to the European Commission and the EU-UK Joint Committee set up under the Withdrawal Agreement. During this phase, the UK was represented by Michael Gove MP and the EU by Commission Vice President Maroš Šefčovič. The EU was deeply concerned by what they saw as the wilful non-implementation of the Protocol by the UK whilst London was irritated by the insistence of the EU on the implementation of the treaty provisions given the problems on the ground in Northern Ireland. Political relations within Northern Ireland continued to deteriorate with the DUP's departure from government on 3 February 2022 when the First Minister Paul Givan of the DUP resigned, thereby bringing down the devolved government. Continuous efforts between London and Brussels failed to deliver a stable framework for the operation of the Protocol until a further agreement was announced in February 2023, known as the Windsor Framework.

The purpose of the Windsor Framework, which came into operation in October 2023, was to iron out the difficulties with the Protocol on Ireland/Northern Ireland that had bedevilled implementation for the previous two years. In essence, the new Framework was designed to reduce controls, checks and formalities but not abolish them on the sea border. This was intended to make the Protocol more workable and protect the place of Northern Ireland within the UK single market. The key innovation was the introduction of a green lane for goods intended only for consumption in Northern Ireland and an easing of formalities on food products destined for the supermarkets in Northern Ireland. The EU would be given real time access to data on all shipments between Great Britain (GB) and Northern Ireland so that it could assess risks to the EU single market.

This pragmatic solution was a result of a problem-solving approach from both London and the EU, with the full backing of Dublin. Agreement on the Windsor Framework took away one of the most conflictual issues off the EU-UK-Ireland agenda and facilitated the DUP's return to Stormont and the power sharing institutions on February 2024 after a two-year hiatus. It brought to a close one of the most difficult political periods in Northern Ireland since the GFA in 1997 and took the heat out of relations between Ireland and the UK – and between the EU and the UK – and began to repair the deterioration of relations between the two countries as a result of Brexit.

Since the two countries are no longer both members of the EU, the East-West institutions under the GFA are more important than ever. Relations have not regained the warmth and closeness of the pre-Brexit period but are significantly better than the period between 2016 and 2022. If the devolved government in Northern Ireland remains in place and the Windsor Framework operates in a way that fulfils the needs of the two sides, the prospects for a closer and more stable relationship are good. The outcome of the UK elections is eagerly awaited in Dublin.

Future relations

A change of government in London is anticipated in Dublin given the polls and the lengthy period of Conservative power since 2010. Although the government in Dublin will clearly stay out of the election debate in the UK, it would perhaps welcome a change given the instability of UK politics, characterised by the succession of no less than five prime ministers since 2016.

From a Dublin perspective, Rishi Sunak's pragmatic turn on the Protocol was welcome as was the return of power sharing in Northern Ireland. Dublin will work with whatever government emerges in London and there will be considerable interest in the evolving EU policies and approach of a possible incoming government led by Keir Starmer. Dublin has an interest in the closest possible relations between the EU and UK and will support the UK in its search for better relations. It will not, however, be a spokesperson for the UK within the EU, rather an available friend. Moreover, it would not support special treatment of the UK that would disturb the balance between rights and obligations. The new UK government has an opportunity to improve EU-UK relations but the thinness of the TCA would not make possible a transformation, which only a major renegotiation could achieve. However, there is no sign that such an option is on the table.





Gianfranco Baldini and Justin Frosini²

Background

Italy and the UK have long enjoyed good relations, both in political and economic terms. Despite the uncertainties following the 2016 referendum in the UK, these relations have endured.

Italy is one of the European countries where Eurosceptic parties rejoiced after Leave's victory. Over the past decade, the country which was historically a strongly Europhile country has become a distinctively Eurosceptic member state. Since 2016, all the main Eurosceptic parties have served in government. The Five-Star Movement and the League first formed an all-Eurosceptic coalition in 2018-19. Then Georgia Meloni's Brothers of Italy (FdI, Fratelli d'Italia) became the main party of government in 2022, with the League and Forza Italia (which was once mildly Eurosceptic).

Despite the presence of Eurosceptic parties in power, however, none has given any serious consideration to follow the UK out of the EU. Government has had a moderating effect on the Euroscepticism of Italy's Eurosceptic parties, with the League the most vocal against Brussels. Anti-immigration has replaced the EU as the central focus of these parties. In the 2022 campaign, as it prepared to make the transition from opposition to leading a centre-right government, Meloni's party softened its Eurosceptic stance. Indeed, since becoming prime minister, Meloni has developed a friendly relationship with European Commission President Ursula von der Leyen.

In terms of how the public views Brexit, a <u>2021 report</u> found opinion split: 43 per cent thought that the UK made the right decision and 39 per cent that it was wrong. In the same year, another <u>poll</u> showed that Italians were among the least worried by the crisis triggered by Brexit as compared to other EU-related crises. Moreover, Italian support for remaining in the EU jumped 12 percentage points between August 2016 and December 2022, from 56 per cent to 68 per cent.

Since Brexit, the <u>rights of Italian citizens</u> in the UK has become one of the country's major concerns. At the same time, the number of Italians moving to the UK continues to grow despite Brexit. According to the UK <u>Office of National Statistics</u>, the number of Italians living in the UK has grown by 40 per cent since 2016. Although this data might be slightly misleading due to the fact that Italian citizens living in the UK have had to register in order to obtain settled status under the Withdrawal Agreement, the British labour market continues to be attractive for Italians. However, in <u>higher education</u>, the number of Italian students domiciled in the UK for their first year of study decreased from 6,425 in the year 2017-2018 to 3,105 in the year 2021-2022 – roughly a 50 per cent decline.

At leadership level, there have been ebbs and flows in the relations between Italy and the UK for reasons linked both to ideology and personality. The Italian governments led by centre-left prime ministers in the 2013-18 legislature were closer to UK governments than those in the legislature that followed. Most recently, the ideological affinity between UK prime minister Rishi Sunak and Italian prime minister Giorgia Meloni has gone some way in compensating for post-Brexit uncertainty. Since 2020, Meloni has been the President of the European Conservatives and Reformist (ECR) European political group, founded by David Cameron in 2009, which has significantly helped to foster the relations between the parties led by Meloni and Sunak.

^{2.} The authors would like to thank Alessandra Cassisi, Hanna Gesang, Massimo Guglietta, Meya Lee and Sophia Schmidt, who are part of the CCSDD Post-Brexit Observatory, for their valuable research assistance with this report.

Bilateral Relations

On 25 October 2022, while Meloni was giving her first speech as head of government to the Italian Parliament, Rishi Sunak stood outside 10 Downing Street delivering his first speech as the UK PM. Since then they have developed a close personal relationship, which they have been keen to acknowledge and display. No doubt, this privileged relationship is driven by each leader's circumstances. The perception that she is close to Sunak makes Meloni appear less radical and more traditionally conservative, a key element of legitimation, given the post-fascist roots of her party. Meanwhile, Sunak has gained a 'key political ally amongst the larger member states' in the EU.

In April 2023, Meloni and Sunak signed a comprehensive Memorandum of Understanding on Bilateral Cooperation (MoU) in which both countries acknowledge their long-lasting friendship, common European heritage, and alignment on global issues. On security and defence, the MoU builds on existing bilateral agreements. The UK announced it will involve Italian F35Bs in future deployments of its Carrier Strike Group. Both parties affirmed their support for strengthening and modernizing NATO. The parties reiterated their commitment to supporting Ukraine by providing military aid and cooperating on issues related to the western Balkans. They also recognized the growing strategic relevance of Africa and the Middle East. The MoU also has a China-oriented dimension. It calls for peace across the Taiwan Strait and the autonomy of Hong Kong. At the same time, Italy and the UK remain ready to work with China on climate change, biodiversity, global health, and gender equality. The two countries condemned the use of weapons of mass destruction and agreed to maintain intelligence cooperation. They also committed to preserve their industrial bases and to enhance their technology sectors.

Both countries consider 'illegal migration' an urgent challenge. To assess the common challenges posed by illegal migration, Italy and the UK agreed to establish a Strategic Migration Partnership and a Joint Strategic Security Committee. However, twelve months on, these two objectives have not yet materialised.

There is significant policy convergence between the UK and Italy on externalization of the management of asylum seekers. In April 2022, under the Johnson government, the UK adopted its Rwanda policy, according to which the UK considers Rwanda as a 'safe third country' for people seeking asylum and would therefore send them to Rwanda rather than allowing them to seek asylum in the UK. In Italy, the Meloni government announced in November 2023 that it had reached an agreement with Albania for the construction of two centres on Albanian territory to hold migrants rescued at sea by Italian ships. The fate of these two plans is currently hanging in the balance, due to a series of legal challenges as well as uncertainty as to whether they can actually be implemented. Whether they are realised or not, these policies underscore a common trend towards an 'externalization' to third countries of the management of migrants seeking asylum.

In February 2023 the two governments signed a non-binding trade partnership agreement. However, trade relations between Italy and the UK are regulated by the <u>EU-UK Trade and Cooperation Agreement</u>. The figures for trade in goods show a decline in UK exports to Italy and an increase in Italian exports to the UK. As a result, in the twelve months from July 2022 to June 2023, Italy recorded <u>a trade surplus</u> with UK of 18.4 billion euros, 64 per cent higher than the twelve-month surplus immediately before the Brexit referendum, between July 2015 and June 2016 (11.3 billion euros). Over the same period, trade surpluses with the UK fell by 12 per cent in Germany and by 6 per cent in France.

For trade in services, the value data for 2021 shows a sharp decline both for British exports to Italy and for Italian exports to the UK, in line with the trend between the UK and the other countries in the EU. Finally, with regards to foreign direct investment (FDI), Italian FDI into the UK and British FDI into Italy grew more than that to and from other EU countries.

Future relations

Unlike the governments of other European countries, the 2024 European Elections went well for Giorgia Meloni and her governing coalition, with gains for her party and her junior partner Forza Italia and a slight, but not emphatic decline, for the League. The prime minister has come out of the election reinforced domestically and internationally, and was able to immediately show her leadership credentials during the G7 summit which she hosted in Puglia. Although the friendship between Sunak and Meloni was once again on display, polls in the UK suggest this was probably the last time the two will meet as peers. In all likelihood, relations between the two governments will remain good, albeit with a less ideologically aligned tenant at 10 Downing Street. Meanwhile, the UK shadow secretary of state for foreign affairs, David Lammy, has singled out Germany, France, Poland and Ireland as key European countries for bilateral relations, omitting Italy from the list.

The extent to which a less purposeful political commitment to the UK-Italy bilateral relationship at leadership level will impact cooperation at a policy level remains to be seen. Given the recent agreements on defence, cooperation in this area will likely remain strong. While in terms of economic cooperation, there is no major threat on the horizon, maintaining strong ties may be less of a priority. Finally, Meloni is likely to lose an important ally when it comes to pushing a common political approach on the management of immigration in international forums such as the European Political Community (EPC). It is unlikely that Keir Starmer, a human rights lawyer and former director of public prosecutions (DPP) and head of the Crown Prosecution Service, will have much to share with Meloni.

Lithuania



Ramūnas Vilpišauskas

Background

In Lithuania, the UK's departure from the EU was regarded with regret and disappointment. The UK was one of the supporters of Lithuania's aspiration to EU accession and since 2004, Lithuania has considered the UK a like-minded member state in many respects. Both countries supported the consolidation of the common market, further EU enlargement and stronger transatlantic relations. For Lithuania, the UK also provided a welcome counterbalance to France and Germany. Moreover, it became an important destination for Lithuania's citizens, eager to benefit from the free movement of labour inside the EU. In the decade after the 'big bang' EU enlargement in 2004, the Lithuanian diaspora in the UK grew to a significant size.

In addition, EU membership had brought about a consolidation and strengthening of Lithuania's recently regained national sovereignty. Brexit risked fragmentation and the weakening of a club that empowers and amplifies the voice of small European countries. For Lithuania, Brexit represented both a loss of a like-minded partner inside the EU and a weakening of the Union.

Concern that Brexit might lead to the disintegration of the EU did not result, however, in any desire on the part of Lithuania to <u>further deepen</u> integration. Although Lithuania <u>supported</u> EU unity in negotiations with the UK after 2016, it has been reluctant about the proposals advocated by France and Germany for the reform of EU decision-making rules and institutional representation. Lithuania maintained its preference for the status quo of EU institutions and procedures even when Hungary abused the principle of unanimity in discussions over support for Ukraine and EU sanctions on Russian individuals and entities violating international norms, which are issues of particular importance for Lithuania.

Bilateral relations

In the negotiations over the withdrawal of the UK from the EU, Lithuania <u>prioritised</u> the rights of its citizens living in the UK and maintaining economic and security cooperation between the UK in the EU. Since Brexit, an estimated 150,000 Lithuanian citizens have gained settled status and a further 50,000 have pre-settled status in the UK.

In terms of trade and the wider commercial relationship between Lithuania and the UK, Brexit was viewed as a risk but in practice it did not result in a major shock. In 2022, the UK was still among Lithuania's ten most important trade partners, but remained behind geographically closer EU member states such as Latvia, Estonia, Poland or Germany. It also continued to be an important source of foreign direct investment (FDI), ranking fifth, and tourism, which remains high – sixth by country of origin.

Since Brexit, Lithuania has been developing its bilateral relationship with the UK, but continues to emphasize the importance of EU unity and prefers to discuss future relations with the UK from the perspective of an EU member state, not least because it reduces the asymmetry of bargaining power in regard to the UK. This ranking of preferences is reflected in the Joint Declaration on Bilateral Cooperation, which was signed by the minister of foreign affairs of Lithuania and the secretary of state for foreign, Commonwealth and development affairs of the UK on 23 May 2022, against the backdrop of Russia's war against Ukraine.

The Joint Declaration stresses that Lithuania, as an EU member state, views the UK as a key strategic ally and seeks to contribute to further cooperation between the EU and the UK. It notes that bilateral

cooperation is consistent with the EU-UK framework, and benefits from it. During the six months of bilateral negotiations that led to the Joint Declaration, Lithuanian officials coordinated with the European Commission on multiple amendments to the draft.

The Joint Declaration opens with the statement that Lithuania and the UK are bound by a shared strategic vision and universal values and commit to working together as part of a wider global network of liberty to defend peace, freedom, democracy, human rights, the rule of law, gender equality, rules-based international order, free trade and economic security. It also refers to 'values-based foreign policy', a term frequently used by the current conservative-liberal coalition government of Lithuania as the foundational principle of its foreign policy. And it is consistent with the programme (in power since late 2020) on foreign affairs, which positions Lithuania as a centre for the development of freedom and democracy, and supporter of democratic reforms in its Eastern neighbourhood.

The government's programme includes a section on Lithuania's 'closer cooperation with the UK' in the passages dedicated to the country's defence and security, which immediately follows the provisions for developing transatlantic relations and for an effective strategic partnership with Poland. The document outlines aspirations for strengthening bilateral cooperation in security, Eastern policy, economic and technological relations and over the concerns of Lithuania's diaspora in the UK. It also commits to a focus on the 'UK-NB8' cooperation format – the Nordic-Baltic 8 or NB8 are Finland, Sweden, Norway, Iceland, Denmark, Estonia, Latvia and Lithuania. This provision reflects Lithuania's preference for a multilateral format for cooperation with the UK, an approach that reduces an asymmetry of bilateral bargaining power that would otherwise favour the UK. Meanwhile, the three Baltic states have already held common meetings with the UK to discuss matters of common interest.

The Joint Declaration on Bilateral Cooperation also aims on strengthening transatlantic solidarity, countering Russia's aggression, supporting Ukraine, cooperating on issues related to the Indo-Pacific region and China, collaborating to tackle global challenges and advance freedom, as well as supporting other principles and values of democratic societies. It has separate sections dedicated to the formats of regional cooperation mentioned above, in particular those aimed at advancing reforms in Ukraine, Moldova and Georgia, and to strengthen defence and security. Provisions on cooperation in other areas such as international criminality, economic relations, technology and bilateral trade, education, science and culture make frequent references to the EU-UK Trade and Cooperation Agreement and to NATO-EU cooperation.

In practice, however, bilateral cooperation has mainly focused on security issues, in particular support for Ukraine and Lithuania's relations with other Eastern neighbours. Lithuanian policy makers appreciate the UK's leading role in the Joint Expeditionary Forces (JEF), which brings together ten Northern European countries with high military readiness and conducts regular exercises. Lithuania has also been strengthening its bilateral relations with major EU member states. Bilateral defence cooperation with Germany has increased in the wake of the latter's commitment to station a brigade in Lithuania by 2027, while France's recent shift in approach to the threat posed by an aggressive Russia has led to a more intense relationship between the two countries.

Since Brexit, the UK has strengthened its diplomatic presence in Lithuania, partly as a result of the transfer of some of its diplomats from Moscow and Minsk to its embassy in Vilnius. The UK has also taken a keen interest in Lithuania's decision to allow Taiwan to open a representation office in Vilnius, with all the implications that this move carries for relations with China. In Vilnius, however, it has been noted that the UK government's pragmatic foreign policy approach contrasts with Lithuania's current values-based foreign policy.

In respect to migration, the two countries have similar approaches to irregular migration from third countries, especially when it is orchestrated by authoritarian regimes. For example, Belarus has organised illegal migration flows across its border with Lithuania since mid-2021.

Future relations

Lithuania's bilateral relations with the UK should be seen in the context of high geopolitical tension. Russia's large-scale war against Ukraine added urgency to the need for military and security cooperation. Defence and security, transatlantic solidarity as well as support for Ukraine are important priorities for both Lithuania and the UK in the implementation of the Joint Declaration for 2024.

Like the EU-UK relationship, the bilateral relationship became more constructive under the government of Rishi Sunak. There were discussions in autumn 2023 over whether to upgrade the seniority of the ministries involved in delivering the Joint Declaration to make it more ambitious, in particular for cooperation on security and defence and on youth mobility. Since both countries are going to the polls in 2024, taking these actions forward was left to after the elections.

The current thinking in Vilnius is that Europe is witnessing epochal geopolitical shifts, which make bilateral cooperation with the UK and cooperation between the EU and the UK more important. There is an expectation that a new UK government will be more open to cooperation and that there will be greater opportunities for joint initiatives in security and defence and support for Ukraine.

Malta



Mark Harwood

Background

Malta was a British colony for 160 years, before becoming independent in 1964. Although the relationship with its former colonial power could sometimes be fraught, especially in the 1970s when Malta moved towards neutrality – the last British military bases closed in 1979 – the relationship has remained close. After Brexit, Britons still make up the largest group of tourists visiting the islands and the UK is second only to Italy – Malta's nearest neighbour – as a destination for the Maltese. English remains an official language, British media still has a presence on the islands, and UK citizens are the most numerous 'foreign residents', though they fall to second place if we discount those with dual citizenship.

While the Maltese government was dismayed by the Brexit vote in 2016, the then prime minister stated that he wanted Malta to be the 'most English-friendly country in the EU'. Malta sought to create a framework that would enable UK citizens and businesses to remain on the islands, building on the bilateral agreements that were in place with the UK before Malta joined the EU in 2004, in particular in the area of healthcare. Politicians referred to these pre-membership agreements as the bedrock for future cooperation, with the proviso that these would continue to run as long as they did not undermine Malta's obligations as an EU member state.

Malta was one of the countries that stood to be most affected following the referendum, given the close economic and social ties between the two countries. In 2016, the UK was Malta's sixth most important trading partner for exports and the ninth most important for imports. Several hundreds of Malta-registered companies had British shareholders (1,149), with twenty manufacturing and service companies wholly or partially British owned, employing just under 2 per cent of the active workforce (3,000 people). The UK was also the most popular destination for Maltese students studying abroad. Healthcare was an especially important area of bilateral cooperation. The Maltese and British National Health Services (NHS) cooperated closely to provide reciprocal free medical care and specialised training.

Beyond the bilateral dimension, Brexit also affected Malta's position in the EU, where it would be losing a major ally. The two countries sat side by side at the Council. The UK had always been a like-minded partner for Malta in areas such as financial services and tax harmonisation. This affinity also extended to areas such as military cooperation, where the UK's reluctance about an independent EU military capability suited Malta, whose lack of enthusiasm for military cooperation derived from its neutrality and the possibility that it would be excluded from financial instruments geared towards defence spending. When the Union launched Permanent Structured Cooperation (PESCO) in 2017, Malta and the UK, along with Denmark, opted out.

In the wake of the UK referendum, Brexit was a major concern for the Maltese government, which made preparation for all scenarios, including a 'no-deal Brexit', and focused on negotiating on bilateral cooperation against the backdrop of the withdrawal negotiations within the EU. While planning for a post-Brexit relationship, Malta also invested in selling itself as a destination for UK companies seeking a foothold in the EU.

Since Brexit, the UK's economic importance as a trading partner has declined. The UK has dropped from sixth to seventh in terms of exports and from ninth to eleventh for imports. One prominent business group called Brexit a 'horrendous experience' pointing to its impact, especially on the imports of medicines, foodstuffs, second-hand cars and education. Several British high-street retailers which operate in Malta, also faced supply-chain problems and shelves were empty for months in the immediate aftermath of the UK exit.

In a long-term study of around one hundred Maltese firms in 2022, more than half stated that they had not been impacted by Brexit. Those that were impacted were primarily manufacturing, wholesale and retail firms, which cited an increase in regulations, longer 'lead times', lower availability of inputs as well as higher costs, including transport – which could have been because of the Covid pandemic – as the main impacts of Brexit. Ten per cent of the companies in the study noted that they had to close parts of their business, which reduced the volume of exports.

Nevertheless, the picture is not as bleak as may have seemed at first. The number of British tourists has remained robust, and is still the largest group in terms of number of tourists and money spent. And although the number of Maltese studying in the UK has declined, the number of those studying at British universities with an overseas presence has doubled. Several universities have set up campuses in Malta. Malta has also become a destination for UK iGaming companies, an industry that now employs over 7,000 people locally. The impact of Brexit on bilateral relations has therefore been more complex than might have been anticipated.

At EU level, Malta has tried to compensate for Brexit by seeking new strategic partnerships, most notably with France. Malta's view on European cooperation has also shifted as Brexit remains a topic of discussion in Maltese political and academic circles. UK rhetoric that 'Europe is not just the EU' has also entered Maltese politics – a development that could reflect how closely attuned Maltese politics is to British politics and the influence of UK press and media, which is widely available in Malta, or the broadening of Malta's foreign policy goals that has been evident over the last few years. Since 2023, Malta has had a seat at the UN Security Council and in 2024 is the chair of the Organization for Security and Co-operation in Europe (OSCE). These are both organisations where links with the UK remain important. At the same time, there is a consensus that Brexit was an economic disaster for the UK, and there is little traction around the idea of a Maltese exit. Euroscepticism remains weak in Malta.

Bilateral relations

In February 2023, Malta and UK signed a bilateral cooperation framework agreement, which covers foreign policy, security and defence, as well as trade, investment, research and innovation. It also extends to: energy, climate change and sustainability; public administration and the rule of law; and 'people and culture'.

The agreement can be broken down into four main commitments. The first reiterates common aims – Commonwealth values, support for Ukraine, and support for LGBT+ equality. The second relates to developing and enhancing areas of cooperation, such as joint efforts to promote stability in the Mediterranean, resume the UK-Malta migration dialogue, share intelligence on security threats, and strengthen commercial ties. The third includes targeted action, such as sharing best practice on processing passenger data, workshops on the digitalisation of health services, the development of certificates of innovative technologies, or reviewing the Reciprocal Healthcare Agreement. Finally, the agreement provides for support to Malta in supporting SMEs, enhancing cyber security, ensuring Maltese access to UK Tier 1 Defence Training, and support for judicial reforms and the Centre for Financial Integrity among others.

The agreement ends with a commitment to an annual dialogue alternating between Valletta and London. When the Maltese Foreign Minister met the UK's Minister for Europe in January 2024, the main themes were OSCE and the UN, the UK's relations with the EU, cooperation on Gaza and other conflicts, the Commonwealth, and immigration. They also agreed to take stock of the follow-up meetings on the implementation of the bilateral agreement. Thus, eighteen months after the bilateral agreement was signed, a certain stability has materialised.

Malta's focus on working though multilateral forums and organisations outside of the EU, is a shared interest for both countries, giving a new, international dimension to bilateral relations, instead of the pre-Brexit emphasis on cooperation within the EU.

Future relations

Brexit has clearly had economic impact on bilateral relations, and, with the loss of EU-level cooperation, it has also diminished the UK's strategic importance for Malta. Nevertheless, the UK remains one of Malta's most important external partners and relations with the UK are strong. While interaction between the two countries has diminished since Brexit, Malta still cooperates closely with the UK, the embassy staff in both countries has stayed consistent and bilateral cooperation remains a priority for both sides. For the UK government, Malta is a useful and sympathetic voice in the EU.

The forthcoming UK elections have not generated much discussion or attention in Malta. Maltese news has been primarily occupied by the war in Gaza, continuing migration issues in central Mediterranean, Malta's role in the UN and OSCE and the 2024 European elections. Nevertheless, there is optimism that a new government in the UK might offer a chance for enhanced relations between the two countries, driven by the close relations between British Labour and the governing Maltese Social Democrats. Malta has only two parties represented in Parliament. The opposition Christian Democrats have historical links with the Italian Christian Democrats and with their scattered successors since their implosion in the 1990s, while the Maltese Social Democrats, in power since 2013, have strong and continuing links with the British Labour Party. Should the British Labour Party win the 2024 elections, the Maltese Labour Party could develop closer relations and further enhance cooperation between the two countries.

The Netherlands

Rem Korteweg

Background

Prior to the UK's departure from the EU, the Netherlands primarily focused its diplomatic attention in Europe on relations with three countries: Germany, France and the UK. The 'big three' member states were its main European trading partners, helped by their geographical proximity. The Hague also developed good access to the EU's key decisionmakers and Dutch diplomats often played a useful role in helping make sense of the Germans to the British, and the British to the French, and vice versa.

The Hague had always been a strong supporter of the UK's EU membership. In the early 1970s, the Netherlands worked hard to bring the UK into the European Community, not only because UK membership would increase the EEC's clout, but also because The Hague believed the UK could provide a counterweight to the Franco-German axis and help push back against the overly centralizing ambitions of the European Commission.

With Brexit, the balance of power inside the European Union shifted. Following UK accession, the North Sea had become an EU lake. Brexit turned that lake into the EU's western maritime frontier. The Netherlands, once at the heart of the decision-making triangle between Paris, Bonn and London, now found itself on the bloc's western periphery. Traditionally oriented toward the west and with a strong maritime and mercantile tradition, the Netherlands now found itself in a European Union that was becoming gradually more continental. Britain's departure shifted the demographic, economic and political centre of gravity in the European Union towards the south and the east – in other words, away from the Netherlands. The Franco-German tandem became more important, as did the influence of southern European states, at the expense of the Netherlands. It was a challenge that the Netherlands found difficult to address, particularly as founding member of the EU, and Dutch diplomacy had to adapt.

The Netherlands has sought to develop new political alliances in Europe and invested in diversifying its European diplomacy. It invested in ramping up its diplomatic presence and explored new ties. Its initial post-Brexit reflex was to focus on northern European countries. Thus, prime minister Mark Rutte organised a series of mini-summits with the Baltic states, Denmark, Ireland and the Visegrad-4 (Czechia, Hungary, Poland, Slovakia), either with the other Benelux countries (Belgium and Luxembourg), or alone. The Dutch ministry of finance flirted with the development of a euro-hawkish Hanseatic League including the eight frugal northern European countries to counter some of the centralizing ideas of French president Emmanuel Macron, though the League never became more than a coalition of convenience. The Hague also invested in bilateral ties with Berlin and Paris, of course.

The blossoming relationship with Madrid is of particular interest, not least because the Dutch and the Spanish prime ministers come from different political families. Despite differences over their preferred conception of the EU, the two countries share common interests on the EU's external policy as well as on trade, climate policy and EU reform. This new bilateral relationship has resulted in at least two important policy initiatives: one on open strategic autonomy, the other on the future of the stability and growth Pact.

More generally, the Netherlands has sought to cultivate its new position as the fifth-largest economy inside the EU, claiming at times that it was the smallest of the large countries, or the largest of the small. The Hague has not committed itself to fixed coalitions but instead seeks like-minded partners ad hoc on particular issues.

Brexit has had a significant impact on Dutch trade with the UK. The UK had been one of the Netherlands' top four trading partners. Businesses now seem to have mitigated most of the trade disruption associated with Brexit, including through trade substitution. Dutch firms have reoriented towards the EU market at the expense of exporting to the UK. Difficulties with time-sensitive trade – for instance, in fresh produce, fish, or flowers - is perhaps the most visible sign of how Dutch firms are affected by the new frictions in trade between the EU and the UK.

Throughout the negotiations, the Netherlands aimed to protect the integrity of the single market, based on the fairness principle that non-members should not be able to access the same benefits as member states. This approach also arose in part from a domestic anxiety that, if the UK could 'get a good deal' while outside the EU, it would support those arguing for a Nexit. This view was shared by most political parties in the Netherlands – with the exception of the Eurosceptic right. Given the UK's proximity to the Netherlands, its size, and comparable economic composition, the Dutch were particularly worried about state aid and level playing field guarantees during the talks. They expected the Commission not to water down any commitments in the negotiations over the future trading relationship, which culminated in the EU-UK Trade and Cooperation Agreement (TCA).

While the Netherlands was disappointed to see the UK leave the EU, Brexit also brought a number of benefits. The UK's decision to leave the Erasmus education exchange policy, and the Dutch decision to offer a wide range of English-language Bachelor's and Master's programmes, led to a major upswing in the number of European students enrolled at Dutch universities. The Netherlands also became an attractive alternative for foreign firms that sought access to the EU market, and had previously used the UK as their European base. Similarly, the Netherlands became a distribution hub for UK firms that needed a footprint inside the EU to continue trading.

Bilateral relations

Initially, the Dutch political class was shocked that the UK had voted to leave. Dutch political leaders voiced their concerns that Britain's decision would have economic, political and social consequences. There was also a degree of *schadenfreude* among Dutch politicians and media as political turbulence swept through Westminster in the period between 2017 and 2020. As the talks progressed, the Netherlands kept its diplomatic distance, but worked through the Article 50 Task Force.

Since the TCA was concluded, however, relations with the UK have intensified. The Netherland seems to have turned a page. Alongside its renewed focus on diplomacy in the EU, there was also a strong willingness to engage with the UK on a variety of issues. In November 2022, the two countries signed a 'joint statement on foreign, development and security bilateral cooperation' in the context of their annual bilateral 'North Sea Neighbours' conference. The agreement focuses on defence and security cooperation, as well as on other topics that the TCA does not cover. For example, the UK and the Netherlands have developed close cooperation on sanctions policies. They joined forces to make F16 fighter jets available to Ukraine and to train Ukrainian pilots, and the Netherlands actively aims to keep the UK 'in the loop' on working level EU conversations regarding support for Ukraine.

Beyond foreign policy, the UK and the Netherlands signed a Memorandum of Understanding (MoU) on quantum cooperation in late 2023. And as neighbours, there are a number of practical issues where the UK and the Netherlands have started to discuss closer collaboration, including wind farms, fishing stocks, sustainability of the North Sea, and the security of underwater critical infrastructure. Energy cooperation in particular has received increased attention, driven by the deteriorating geopolitical environment and concerns about energy inflation and security of supply. The Hague was pleased that the UK decided to join the North Seas Energy Cooperation initiative at the inaugural meeting of the European Political Community in 2022. The two countries are now working on the roll-out of windfarms in the North Sea alongside other littoral states. And yet, the Hague remains aware that any practical steps it undertakes will have to conform to the overarching agreements struck by the EU and the UK.

Future relations

All in all, relations with the UK are no longer a major topic in the Dutch foreign policy debate. Brexit is no longer front-page news in the Dutch media. Though some hope that a new British government might reconsider Brexit, the Dutch government is likely to take a pragmatic approach. If anything, the Hague will hope that the new occupant of Downing Street is similarly pragmatic, and that the souvreignist Brexiter ideology of the past few years will no longer be dominant in Westminster.

Regarding a common agenda, there are some trade irritants which the Netherlands would be keen to discuss, but which will require an EU-wide agreement. This includes a sanitary-phytosanitary agreement for trade in agricultural goods. At a bilateral level, the new Dutch government will be primarily focused on security cooperation, including cooperation on pushing back against illegal migration and learning from UK experiences to externalise parts of its migration policy to third countries. In the military domain, the Netherlands will aim to continue to work with London to sustain the necessary support for Ukraine and increase the prospects for European-wide defence cooperation. It is worth recalling that a Netherlands Royal Navy frigate accompanied HMS Queen Elizabeth on its maiden voyage to the Indo-Pacific in 2021. The Netherlands earlier lobbied to make PESCO projects open to third parties, including the UK, and can be expected to do the same when it comes to new defence projects commissioned through the European Defence Fund. Here, the UK will find a helpful friend in the Netherlands.

Finally, economic security is an area where the Netherlands would like to see closer UK-EU cooperation. The EU's economic security strategy will play a prominent role in the new Commission agenda. One element of this strategy is to build stronger partnerships with third countries to reduce unwanted dependencies on China, Russia and others. In this light, closer cooperation between the UK, the Netherlands and other EU members, makes sense. In return, this could help the Netherlands to get a closer read on G7 discussions on these issues, and allow it to join so-called G7-plus formats where relevant. Given the intertwined nature of European supply chains and investment flows, the UK and the EU have an interest to develop a better understanding of the security dimension of outbound and inbound investment flows and to share information on export controls.

In short, the Netherlands hopes that stronger (economic) security cooperation will be an easy win and enable the EU and the UK to move their relationship forward. Not only would such a move make sense from a policy perspective, but Europe's current geopolitical circumstances appear to demand it.





John Erik Fossum

Background

Norway's strong relationship with the UK is rooted in history, notably shared experience in World War II. London was home to the King of Norway and Norway's government-in-exile, and the Norwegian merchant marines played an important role as a supplier of strategic goods to the UK. The memory of the UK's war effort and its assistance to Norway endures among the Norwegian population, which is also very sympathetic to strong Anglo-American relations, not least because the US is home to a large Norwegian diaspora.

As a major player in NATO, the UK is an essential partner for Norway's security and defence, in particular due to the threat posed by Russia, with whom Norway shares a border. Trade relations between the two countries are also <u>significant</u>. The UK is Norway's most important single trading partner, while Norway ranks as the UK's twelfth largest. No less than <u>three quarters of UK goods</u> imports from Norway are accounted for by oil and gas commodities, reflecting Norway's centrality to the supply of oil and gas not only for the UK but for Europe in general.

Brexit has not affected the bond between the two countries. Both sides have sought to maintain close ties following the UK's altered status in Europe. However, the UK's vote to leave the EU in 2016 did raise two sets of issues, first in relation to each country's affiliation to the EU, with the possibility that the UK's post-Brexit EU affiliation serve as a model for Norway or, inversely, the so-called 'Norway model' be the template for the UK's future relationship with the EU. Second, both countries have had to define their own formal-legal arrangements for the bilateral relationship.

As Brexit unfolded, Norway faced the prospect of a squeeze between the UK and the EU. As a non-EU member, Norway was not a party to the negotiations but has close relations with both sides. Changes in the EU-UK relations would result in spillover effects on the Norway-EU relations and Norway-UK relations, leading to a new trilateral dynamic. Brexit also raised the question of which relationship Norway was to prioritize, precisely because Norway has such close relations to both the EU and the UK.

At the time of Brexit, the government underlined the need to sustain as close a relationship to the EU as possible given the volatility of the UK's position and on account of Norway's obligations to the EU and its members. Norway's closest neighbours, the Nordic states Denmark, Finland and Sweden, are all EU members. Norway's border with Sweden is 1,630 kilometers long, and to keep it open requires Norwegian affiliation with Schengen. There is also an institutionalized system of Nordic cooperation, including a passport union and open labour market, which would suffer if border controls were introduced between the countries.

Since the Norwegian government wanted to maintain a close relationship with the UK, the question was: how? Immediately following the Brexit vote, Norwegian Eurosceptics pointed to the UK as a possible model to emulate. However, these voices were quickly silenced as the tortuous process of withdrawal unfolded, and the libertarian political drivers of Brexit emerged. Although the Norwegian political landscape is overall to the left of the UK, much of Norwegian opposition to the EU comes from the left including from within the current governing Labour party (AP).

Moreover, governing coalitions in Norway operate on the basis of 'gag rules', which involve a commitment not to change the status quo of Norway's EU affiliation. Since every coalition government includes a pro-EU/EEA party and a junior partner that is Eurosceptic, such a commitment is important to prevent the governing coalition from unravelling over the question of Norway's relationship to the EU affiliation.

Following recent assessments of the UK's post-Brexit affiliation with the EU, there is little to suggest this will change, or that there is a strong desire to emulate the more distant form of relationship that the UK has with the EU.

Indeed, scepticism towards adopting the UK model is reflected in a recent government-commissioned report on the experience of Norway in the European Economic Area (EEA). Put together by academics and practitioners (former government officials and representatives from different interest groups), it concludes that the EEA has lived up to its purpose. The report also assessed the Swiss, UK and Canadian models, and concludes that none offers the same level of access to the internal market as the EEA. It comments on how Brexit has affected the EU's attitude towards countries that, like the UK, do not want to be members, observing that the EU has hardened its position on 'cherry-picking' aspects of the single market. The EU will not allow exceptions or special arrangements that undermine the internal market and will require the creation of bodies that ensure surveillance and compliance with agreed-upon obligations.

While the report was well received by the governing Labour Party, most of whose members and voters support the EEA, the junior coalition partner, the Centre Party which opposes the EEA Agreement, has remained silent.

The Norwegian Trade Union, which is divided on the appropriate model of affiliation for Norway, but has a majority in support for the EEA, undertook its <u>own assessment</u> of Brexit. It refers to the UK's economically liberal direction as a result of leaving the EU, which it considers undesirable.

Meanwhile, Norway keeps a close eye on the debates in the UK around the pros and cons of the so-called 'Norway model', in particular as a means to <u>maintain access</u> to the single market. The European Economic Area (EEA) is the core of Norway's affiliation to the EU and ensures equal rights and participation in the EU's internal market (agriculture and fisheries exempted). Moreover, Norway's EU affiliation is very comprehensive. It covers all aspects of EU integration and is currently made up of around one hundred agreements, which is a far cry from the EU-UK Trade and Cooperation Agreement (TCA). For the UK, an EEA-type arrangement is the only affiliation mode that would ensure full access to, and participation in the EU's internal market, not least because this is the EU's preferred mode for non-member affiliation. Norway, however, is not a part of the EU's Custom's Union. This is far less of an issue for Norway than it is for the UK because the UK imports many more non-EU originated inputs than Norway. Thus, were the UK to opt for the EEA, it would need an 'EEA plus' agreement.

However, for Norway and the other EEA-EFTA members Iceland and Lichtenstein, UK membership of the EEA would represent a major challenge. And although Norway was keen to see the UK remain in the internal market, it did not want it to so through the EEA. The EEA Agreement requires unanimity for incorporation of new EU provisions and does not give much scope for two-way negotiations. Essentially, it is a vehicle for EU rule incorporation in affiliated non-members. Given the UK's size and distinct interests, UK membership of the EEA could upset these working arrangements.

Bilateral relations

Norway and the UK have adopted several formal agreements. Some are bilateral, such as the agreement on the rights of citizens post-Brexit, and some are multilateral. For example, a UK-EEA-EFTA social benefit agreement came into force in January 2024. A central agreement to the new relationship is the <u>trade agreement</u> between the three EEA-EFTA countries (Iceland, Lichtenstein and Norway) and the UK. There are clear parallels between this agreement and the TCA. A clear priority was that Norwegian companies enjoy access to the British market that is at least as good as EU's companies through the TCA. The Norwegian government is <u>satisfied</u> that it achieved this result and even obtained better terms that the TCA in some respects.

These agreements reflect how UK-Norway relations are difficult to consider in strictly bilateral terms because both countries are embedded in agreements with other significant partners that have spillover

effects and therefore need to be managed. Such a perspective can be observed in the case of triangular relations between the UK, Norway, and the EU, where there has been a dynamic unfolding mainly in relation to the single market and flanking policies. These dynamics cannot easily be separated from security more broadly speaking. The European Defence Fund (EDF) is 'intimately connected to the operation of the single market' and that, in turn, is relevant for the EEA Agreement.

Security is relevant to many of Norway's bilateral and multilateral relationships. The UK is an essential contributor to Norway's military security, and both are bound up in NATO. They are therefore embedded in a transatlantic UK – Norway – US triangular dynamic. In May 2022, the UK and Norway signed a comprehensive Joint Declaration to promote bilateral strategic cooperation. With a strong focus on security and defence, the document also includes commitments to tackle global challenges, to promote ambitious climate and environmental policies, to cooperation on energy, economic and investment, as well as on culture and education. The government notes that 'Great Britain is Norway's most important European ally. Great Britain's importance for Norwegian Security is increasing and has accelerated further in connection with the increased importance Great Britian contributes to the North Atlantic, Northern Europe.'

In May 2023, the UK and Norway signed an <u>agreement</u> to enhance cooperation on undersea capabilities to counter the threat to undersea pipelines. This is especially important to Norway, since it supplies oil and gas to the rest of Europe via 8000 kilometers of pipelines that are highly vulnerable to attack. Security in the Arctic is also part of <u>shared concern of both countries</u>, with the UK's stance on Arctic policy having expanded in the post-Brexit period to include military security in the face of Russian militarization. The UK is an observer at the <u>Arctic Security Forces Roundtable</u>, which brings together high-ranking military leaders from the Arctic states.

One area where there are ongoing negotiations is fisheries. Fishing quotas must be agreed on an annual basis. So far, there have not been any profound differences and nothing suggests that divergences would lead to major disagreements.

However, the Norwegian government has refused to build a NorthConnect interconnector that would link Norway and Scotland. The main reason is resource nationalism, a key plank in the platform of the junior coalition partner. The Carbon Border Adjustment Mechanism (CBAM) is also potentially a triangular issue. The Norwegian government has thus far considered it irrelevant to the EEA Agreement, but the UK is planning to introduce its own CBAM. If the UK and EU's CBAMs are not aligned, the consequences for Norway would be unclear if it decides to sign up to the EU version.

Future relations

Norway would welcome a UK government that wanted closer relations to the EU, that offered stability, and that did not threaten to break international law. The Norwegian government wants predictable EU-UK relations that carry over to, and do not disrupt, Norway-UK and Norway-EU relations. Moreover, given that Norway's political establishment tends to the left of the UK, and a current coalition government led by social democrats, most of Norway at least would welcome a Labour government in the UK.

For Norway, the UK's support is important for addressing challenges in an uncertain world. Cooperation on military security remains a priority as does predictable EU-UK relations for broader security issues. In an increasingly securitized world, the relationship between military security strictly speaking, and broader security has become increasingly important. Here, a division of labour has developed between NATO and the EU.

Before Russia's invasion of Ukraine, Norway-UK economic issues were subject to the agreements and regulations that marked trilateral UK-EU (TCA), Norway-EU (EEA), and UK-EEA-EFTA relations. In an environment that has become highly securitized, these relations can no longer be confined to economic interaction but have expanded to embrace economic security, including investment regulations, and cybersecurity and hybrid warfare, as well as military security, which has worked its way into the EU's

internal market through the EDF. That will affect the economic dynamics of the Norway-UK-EU trilateral relationship and the security dynamics of relations between Norway, the UK and the US.

Moreover, should the US become a less reliable ally following the US election, Europeans would be compelled to take an even more active role in their own defence. Under those circumstances, the current division of security work between the EU and NATO is likely to come under threat.

Finally, Norway would be keen to gain an ally in addressing concerns over the ongoing Russian militarization of the Arctic. Norway has historically sought to involve the EU as a counterweight to Russia but also China's increased interest in the Arctic. Whilst the UK is not a major Arctic player, its large naval presence makes it relevant for Arctic matters. The High North was central to the UK's post-Brexit Global Britain approach, with a stronger focus on security in recent years, following the 2018 UK Arctic Policy Framework to advance prosperity and security in the region. The UK and Norway already cooperate in multilateral groupings such as the Northern Group and the Joint Expeditionary Force. There is also the status of Spitzbergen, which is currently under Norwegian suzerainty, but which could become politicized. Norway would be interested in support from friendly powers in this area, and there are voices in the UK that urge the government to take a more active role in the Arctic.

Poland



Natasza Styczyńska and Volodymyr Posviatenko

Background

Brexit was as unexpected as it was shocking for Poland both in terms of its implications for bilateral relations and the future of the EU. Relations between Poland and the UK have always been strong due to historical ties, an important trade relationship, and a shared outlook on the EU's neighbourhood policy. Following the 2004 EU enlargement, economic and cultural exchanges increased substantially, driven by a large Polish diaspora in the UK. The practical implications of Brexit for more than a million Polish citizens living in the UK was a major concern and focus for Poland post-referendum. It is estimated that around 250,000 Polish citizens left the UK after the referendum.

The UK's decision to leave the EU caused considerable unease in Poland because of its anticipated effects on the Common Security and Defence Policy (CSDP). However, Brexit has not impeded military cooperation between the two countries. Indeed, collaboration on security matters continues to grow and serves as a basis for cooperation in other areas. By contrast, trade between the two countries has fallen. Data from 2021 shows that Polish exports of goods to the UK decreased by 28.7 per cent and imports by as much as 59.7 per cent compared to 2019. Since the entry into force of the EU-UK Trade and Cooperation Agreement (TCA), there has been a slow but positive change in bilateral trade, although the UK has not regained its pre-Brexit position. It is now the fourth largest recipient of Polish goods after Germany, the Czech Republic and France.

With the departure of the UK Conservatives, the Polish Law and Justice party also lost its main ally in the European Conservatives and Reformists (ECR) Group in the European Parliament. More broadly, bilateral platforms for political cooperation post-Brexit are lacking.

Bilateral relations

Security cooperation is a cornerstone of bilateral relations between Poland and the UK and has been strengthening against the backdrop of changing geopolitics since Russia's invasion of Ukraine. Security cooperation has traditionally been one of the priority areas for relations between the two countries, with a shared vision of Euro-Atlantic security. For Poland, the UK is as an indispensable NATO ally, with whom Poland has a common strategic perspective on the security environment in the Baltic and the Black Sea regions, NATO's eastern flank. Unlike other Western European partners, the UK has consistently treated Russian aggression in the region as a threat to Euro-Atlantic security and stability, thereby echoing Poland long-standing concerns.

Against the backdrop of worsening security in Central and Eastern Europe, notably after Russia's full-scale invasion of Ukraine in February 2022, cooperation in security has assumed even greater significance in the bilateral relationship between the UK and Poland. The invasion dramatically changed the geopolitical landscape in Europe and beyond, pushing security cooperation to the forefront of foreign policy.

A week before the invasion, in the face of the growing threat posed by Russia to Euro-Atlantic space, the UK and Poland established a <u>trilateral partnership</u> with Ukraine, underlining their long-term commitment to Euro-Atlantic security and anchoring UK military and political engagement on NATO's eastern flank. Following February 2022, the UK and Poland have been key proponents of Euro-Atlantic military support to Ukraine. Within weeks, on 7 April 2022, they had established a Joint Commission to coordinate the transfer of arms, which was later superseded by the Ukraine Defence Contact Group (UDCG).

The presence of <u>British soldiers in Poland</u> has notably expanded since the start of the full-scale Russian aggression. The number of British troops stationed in Poland has increased by 450 to around <u>600 troops</u>. The British military contingent is engaged in various activities, such as training Ukrainian soldiers on the territory of Poland and providing engineering support on the border with Belarus. British soldiers are also stationed in Poland as part of the enhanced Forward Presence (eFP) multinational battle group. In March 2022, the UK pledged to deploy the Sky Sabre mobile air defence system in Poland, and two years later, the UK Secretary of state for Defence, Grant Shapps, <u>declared</u> that the Sky Sabre system would stay in Poland until the end of 2024, reaffirming British commitment to the defence of NATO's eastern frontier. The closely coordinated provision of military assistance to Ukraine has strengthened military-industrial cooperation between the UK and Poland, as exemplified by the construction of <u>Mała Narew</u> air-defence system for the Polish Army and the <u>Miecznik</u> multirole frigates for the Polish Navy.

The effects of security cooperation extend beyond the strictly military. Through their leadership in providing military, political and economic support to Ukraine, the two countries have been instrumental in facilitating Ukraine's progress towards Euro-Atlantic integration, a longstanding priority of Polish foreign policy. By spearheading support to Ukraine through Poland, the UK can assert itself as a key force behind European security, thereby enhancing its international standing. Collaboration with the UK also enhances Poland's geopolitical position in Europe.

In London on 5 July 2023, the foreign and defence ministers of the two countries signed the <u>UK-Poland 2030 Strategic Partnership Joint Declaration</u> on foreign policy, security and defence. The new strategic partnership builds on the 2017 Treaty on Defence and Security Cooperation between the UK and Poland, which covers training, military exercises, information sharing and defence industry cooperation. The new declaration envisages an enhanced commitment to building shared capability across five operational domains – air, sea, land, space and cyber – and increased collaboration in training, military education, and industrial capabilities. <u>Former foreign minister James Cleverly</u> emphasised that the new partnership should be seen as a continuation of the strong relationship between the two countries, and a deepening commitment to mutual cooperation and security.

The joint declaration has reaffirmed the UK's long-term military commitment to NATO's eastern flank, as well as the willingness of the two countries to cooperate in resisting Russian aggression. Crucially, the declaration was adopted during a political turbulence in the US, characterised by the Biden administration's indecisive foreign policy and the potential return to power of increasingly isolationist Trump. The diminished credibility of the US and mounting doubts about its commitment to defending its allies underscore the significance of the declaration as a political and security manoeuvre.

The UK-Poland 2030 strategic partnership joint declaration has reaffirmed the alignment of their foreign policy objectives. Beyond their backing for Ukraine's NATO membership, the two countries take a common view of the Western Balkans and the South Caucasus. They have pledged to bolster the defence capabilities and to counteract Russia's influence in both regions.

More broadly, the new strategic partnership declaration extends beyond defence issues to other domains, including trade. This is particularly pertinent to economic assistance for Ukraine, where the UK and Poland have agreed to cooperate in assisting Ukraine with post-war recovery and reform of its economic model, including a transition to greater sustainability. The Declaration also emphasises the parties' commitment to uphold cooperation with the EU and NATO allies in supporting sustainable economic growth in the Euro-Atlantic region and to promote high-level dialogue on pressing issues of energy and migration within the European Political Community. The two countries also stressed their aim to work towards an UK-EU cooperation agreement on migration.

Future relations

After the full-scale Russian invasion of Ukraine, cooperation in security matters assumed even greater significance for bilateral relations between the UK and Poland and will remain the most important area of cooperation as long as the Russian war in Ukraine continues. Poland appreciates the presence of British troops as well as the Sky Sabre system and hopes to keep the latter operating in 2025. The 2023 strategic partnership declaration underlined the main areas of cooperation, which includes not only the eastern Neighbourhood but also the western Balkans and trade relations. However, it remains to be seen what concrete measures will be implemented to facilitate trade between the two countries going forward or how much a future UK government will put the emphasis on gaining support for policies on the management of migration in its bilateral conversations.

In regard to economic relations, trade between Poland and Great Britain is changing. Trade has decreased significantly in some sectors, such as food products, so efforts on the part of the Polish government and producers to rebuild their position on the British market can be expected. The requirement for a S&S (Safety and Security) declaration for goods imported from the EU to the UK and the Single Trade Window system, effective from October 2024, will have impact on Polish producers. Imports are expected to bounce back from their collapse in 2020-2021, including Scottish whisky. Poland was among the top ten countries importers of the spirit in 2023.

Beyond security and trade, Poland would welcome closer cooperation between the EU and the UK in education and research, including student and researcher access to funds for joint research programmes, notably Erasmus +.

Spain



Ignacio Molina and Enrique Feás

Background

Over the thirty-five years of shared EU membership, Spain and the UK forged close ties. The strength of the relationship in business and people-to-people links did not, however, fully translate to the political level first because the countries had very different views about the EU and second on account of the occasional tensions over Gibraltar. However, they were close allies in many key internal EU debates, working to counterbalance the weight of Germany and France. Spain has always been a firm believer in the benefits of free trade, for example. Unfortunately, the result of the 2016 UK referendum put an end to this alliance.

Once negotiations on the UK's withdrawal began, Spain adopted a pragmatic approach to ensure an orderly withdrawal and avoid a no deal. It also defended the integrity of the internal market, the European Commission's role in the negotiations, and the unity of the EU27, resisting any attempt by London at 'divide and conquer'. Aside from these general principles, Spain was focused on three major concerns: avoiding tariffs and minimize frictions in trade; protecting citizens' rights both for UK nationals living or spending part of the year in Spain and Spaniards studying or working in the UK; and the future of Gibraltar.

Most of Spain's concerns were satisfactorily covered by the Withdrawal Agreement and later the Trade and Cooperation Agreement (TCA). However, there was a moment of tension after the initial Withdrawal Agreement was signed with the government of Theresa May in November 2018. The text included an ambiguity in regard to territorial scope from which it could have been inferred that future agreements between the EU and the UK would not need approval from Spain to be applied to Gibraltar, which contradicted the European Council's initial mandate for the negotiations. The ambiguity was ultimately resolved by a <u>protocol</u> attached to the Withdrawal Agreement and a common declaration of the UK and the EU that was acceptable to Spain.

To be sure, Gibraltar is important, but Spain wanted to preserve the strong economic and social relations it had with the UK. For many years, the UK has been the second biggest foreign investor (after the US), and Spain was in the top five most important countries for UK investment abroad. The UK also comes second to the US as a destination for investment by Spanish companies. Trade between the two countries has boomed over recent decades, reaching a value of 30 billion euros on the eve of Brexit.

An illustration of the closeness of the commercial relationship in the 1990s and 2000s was the decision to merge their respective flag carriers, Iberia and British Airways, under a new holding company, International Airlines Group (IAG), with the social headquarters located in Madrid and the financial headquarters in London. However, the merger of the two companies posed a threat at the time of the Brexit negotiations, since the requirement that EU airlines are 'majority owned and effectively controlled by EU nationals' led to a fear that Iberia would lose its right to serve routes within the EU.

For Spain, the UK is the main source of foreign tourists with <u>around 18 million Britons visiting</u> the country each year over the past decade, apart from the years of the Covid 19 pandemic. Spain is also home to the largest group of British expatriates in Europe. There are around <u>295,000 officially registered as residents</u> in Spain (down from 400,000 ten years ago), which makes a significant contribution to the Spanish economy. Estimates of the actual number of Britons in Spain, including those who are not registered or who own property and spend part of the year in the country, amount to around 800,000. On the UK side, the <u>2021 census</u> recorded almost 220,000 Spanish passport-holders resident in England and Wales.

Bilateral relations

Despite the frictions in the movement of goods and limited provisions concerning services that result from the TCA, Spain was the <u>UK's seventh largest trading partner</u> (after US, Germany, Netherlands, France, China and Ireland) in 2023, and the UK was Spain's fifth (after France, Germany, Portugal and Italy).

The food, beverage, and tobacco sector – one of the most important to trade between the two countries – has scarcely been affected. If high tariffs and quotas had been applied, fresh fruits and vegetables might have been sourced from other markets with which the UK has concluded free trade agreements, such as Morocco.

The automobile sector is also strategic in the bilateral relations between the two countries. The UK is the third destination for Spanish exports of vehicles (after Germany and France). Some 250,000 vehicles go annually to the UK, while about 130,000 are imported, in a highly integrated value chain with parts constantly crossing the border. Avoiding tariff barriers was a success, but non-tariff barriers may pose a threat in the long term on account of the just-in-time character of the industry and the fact that it is undergoing structural transformation. Unsurprisingly, perhaps, the volume of exports and imports have dropped since Brexit.

Fishing was also a big issue for the EU during the negotiations. However, the presence of Spanish fishers in the UK maritime zone is less important than that of France, Ireland, Belgium, Denmark and the Netherlands. It barely represents 100 ships, 1,700 direct jobs and another 6,800 indirect jobs — less than 1 per cent of total catch per year. Although the TCA maintained the access of EU vessels to UK waters until 2026, but with a progressive decreasing of 25 per cent of the value of their catches, the effect on Spanish fishing activity has been limited as the species of greatest interest to Spain, such as hake, monkfish and rooster fish, were largely excluded.

In the field of air transport, a <u>solution</u> was found under the TCA to the problem mentioned above that stems from joint ownership of Iberia and British Airways. However, should the issue arise in the future, Spain would argue for a relaxation of the definition of majority ownership and control by EU nationals in the criteria that are related to the concentration of operations, which features, for example, in the EU-Canada Comprehensive Economic and Trade Agreement (CETA). Such a move would be likely to encounter opposition from France and Germany.

The tourist industry, more generally, is already suffering from the end to the free movement of people. Although no tourist visas are required for a stay of less than three months, Schengen rules mean that stays of more than 90 days within any 180-day period require residency or work visas, which deals a serious blow to the long-term stays many UK nationals were used to.

Furthermore, working visas have become highly complex and threaten to reduce flows of qualified workers between the two counties. Under the UK points system that was introduced after the UK's departure, Spaniards wanting to work in Britain require a job offer with a salary threshold of more than 30,000 euros (25,000 pounds). The impact has already been felt on the hospitality sector, agriculture, and the public health system in the UK, where thousands of workers are of Spanish origin. Unless a more flexible approach for the long-term hiring of foreigners is devised, these areas may face levels of shortage similar to that of lorry drivers in 2021.

In terms of residence for citizens post-Brexit, Spain has been more generous than the UK. Britons who already lived and worked in Spain did not have to prove their status in Spain. Residence cards or equivalent permits issued before the end of 2020 remain valid. EU citizens in the UK, by contrast, had to submit an application under the Settlement Scheme if they wanted to continue to live in the UK after 30 June 2021. Restrictions on residence may, however, affect the housing market on the Spanish coast, where British homes are concentrated in Alicante and the Andalusian coast.

Such restrictions add to other inconveniences in daily life, such as the increase in roaming and credit card costs now that mobile and credit card companies are no longer bound by EU directives that limited these charges. Other examples include the end of the validity of UK car insurance policies and veterinary restrictions on the movement of pets between the UK and the EU.

The Withdrawal Agreement did, however, maintain reciprocal access to emergency healthcare, if only for short stays. Although it also provided for the coordination of some elements of social security, including pensions and benefits, such as sickness, disability, and unemployment, the Withdrawal Agreement does not extend to child benefits and other non-contributory benefits.

In March 2023, Spain and the UK agreed <u>a reciprocal recognition of driving licences</u>. This was an issue of particular concern to the hundreds of thousands of Britons living in Spain. After several extensions of the transition period, both parties agreed to a permanent system that allows nationals of the two countries to apply to exchange their licence for its equivalent in the country where they live without the need to take an additional test. The agreement also includes an exchange of information on traffic offences.

On education, the UK's decision to withdraw from the Erasmus student exchange programme was a big blow to Spain. Almost 4,500 Spanish students (the third biggest EU contingent) participated in Erasmus in the UK in 2018-19 and 4,300 British students (the fourth highest number) in Spain. In July 2023, the two governments signed an <u>agreement on educational cooperation</u> which allows students in the British education system entry to universities in Spain. There are also 129 accredited British schools in Spain, with a capacity for 70,000 students. For their part, students from Spain can enter UK universities without having to take a general entrance exam.

Finally, no account of the relationship between Spain and the UK would be complete without a discussion of Gibraltar. In December 2020, shortly after the TCA was signed, which excludes Gibraltar from its territorial scope, London and Madrid reached <u>a bilateral understanding</u>, on the basis of which the European Commission prepared a <u>negotiating mandate which was adopted in 2021</u>. The negotiation of this Protocol, which would incorporate Gibraltar into the Schengen area, has been very intense from 2023. Significant progress has been made, but in June 2024 talks were suspended until after the UK elections.

In parallel, however, the two countries signed a package of Memorandums of Understanding (MoU) on several specific issues affecting Gibraltar in 2020. They cover citizens' rights, tobacco, the environment, and police and customs cooperation. The MoU on citizens' rights guarantees social benefits for cross-border workers living on the Spanish side, without discrimination vis-à-vis British workers. The MoU on tobacco establishes obligations to align prices in the Gibraltarian market as a means of reducing the smuggling that currently takes place, and which causes security and tax revenue problems for Spain. Finally, MoUs on the environment and on police and customs co-operation aim to improve co-ordination between the authorities on both sides. Cooperation on taxation has also been increased, to reduce money laundering and tax evasion.

Future relations

Spain expects the new British government will be more concerned than recent administrations to improve relations with the EU. The peculiarity of Gibraltar makes this the <u>issue of most concern</u> in the short term and the one where Madrid has invested the most political capital in both London and Brussels.

The negotiations, discussed above, that started in 2022, have involved the Vice-President of the European Commission, Maroš Šefčovič, the Foreign Ministers of both countries, José Manuel Albares and, most recently, David Cameron, and the Chief Minister of Gibraltar, Fabian Picardo. The ambition is to remove all physical checks and controls at the land border between Spain and Gibraltar, while ensuring the integrity of the Schengen area and the single market. They include rules establishing responsibility for asylum, returns, visas, residence permits, and operational police cooperation and information exchange,

as well as regulations on land, sea and air transport, the rights of cross border workers, the environment, financial support, and a level playing field.

The narrative that the various governments wish to propagate, especially the local authorities of Gibraltar and the eight Spanish municipalities of the border region of Campo de Gibraltar, is of an 'Area of Shared Prosperity'. The two main elements would be the freedom of movement of goods and people, and the shared use of the airport. There are around 15,000 workers, two thirds of whom are Spaniards, who live in Spain but work in the British colony. The particular challenge concerning the airport, which would be directly accessible from the Spanish side, is that Gibraltar must accept that the Spanish police would be responsible for Schengen access control, perhaps with assistance from Frontex, the European Border Agency. A pragmatic approach has prevailed as the parties decided to leave aside the questions of sovereignty and jurisdiction to focus on cooperative measures.

The expectation in Madrid and Gibraltar is that an incoming Labour majority government would be able to finalise the agreement. However, it will also have to be ratified by the new European Parliament and, depending on whether the final text affects shared competences, perhaps by the national parliaments of the EU27 as well.

After Gibraltar, mobility is the most important policy area for Spain in the UK-EU relationship, especially for young people and education. Madrid has supported the UK's return to the Horizon Europe programme and would like to see this extended to Erasmus, enabling researchers and university students to participate in scientific and academic exchanges. The EU has recently proposed negotiating an agreement that would allow people between 18 and 30 years old to spend up to four years travelling, studying or working without having to set a specific purpose or be subject to quotas. An EU-wide agreement would also prevent the UK from trying to strike bilateral agreements with some member states, but not others.

Another pending issue is the volume of paperwork for the recognition of work and residence rights in the UK for tens of thousands of Europeans who were in the country before Brexit came into force. In autumn 2023, some 140,000 applications were still to be reviewed, including those of more than 5,700 Spaniards.

The renegotiation of a fisheries agreement at EU level in 2026 is less of a concern than in other member states with large fleets since the current agreement has little impact on Spain. But circumstances may change after 2026 as the UK can now dictate its own fishing rules and could decide to completely withdraw access for EU vessels to British waters, even if such a move is unlikely, since such it would inevitably provoke retaliatory action by the EU.

A final, speculative but politically relevant, question for the future concerns the attitude that Spain might take in the event that Scotland becomes independent and applies to join the EU. Although some voices in the UK have argued that Madrid would oppose Scotland's accession, the Spanish government has repeatedly stated that <u>it would accept Scotland's application</u> provided that the process by which Scotland becomes an independent nation is lawful.

Sweden



Nicholas Aylott

Background

Britain is a familiar country to many Swedes. Partly due to their proficiency in English, news about politics in Britain probably receives more attention in the Swedish media than that of any other country, perhaps even America. Many Swedes have spent time in Britain for leisure or work or both. Nordic popular culture, meanwhile, is often appreciated by Britons. At government level, the two countries have, historically, often had quite different views of their national interests. Yet these have rarely come into conflict. The two countries have also shared certain basic political assumptions, such as faith in the capacity of the nation state and a general preference for free trade. Geographically, they are sufficiently far from each other to preclude any disputes about borders or natural resources. Thus, relations between Britain and Sweden have long been excellent.

Swedes, perhaps more than most member states, were shocked by the result of the UK referendum on EU membership in June 2016. They became increasingly aware, moreover, that Sweden would be losing an ally in the Union. As research has consistently shown, Britain and Sweden, alongside Denmark, Ireland and the Netherlands, frequently held similar positions in the Council of Ministers on legislative and regulatory issues.

Still, Sweden stuck loyally to the collective EU position in the negotiations with Britain on the terms of Brexit. Since then, Sweden has been drawn more deeply into the structures and practices of the EU. At the same time, relations with the UK are now also more tightly bound together.

Bilateral relations

Sweden, like the UK, has not always been keen on European integration. Both countries have imperial histories, although Sweden's peaked much earlier. Another historical similarity is that the world wars of the twentieth century seemed to confirm to both Britons and Swedes the utility of the nation state. Although the former look back positively on victory in the conflicts, the latter's sense of success was founded on managing to stay out of them. Indeed, while Swedish neutrality was never enshrined in any international treaty, it became firmly entrenched in national security doctrine after 1945. This was partly due to ideological development in the Social Democratic Party, which governed Sweden continuously (albeit mostly as a minority government or with coalition partners) for four decades until the mid-1970s and then frequently afterwards, too. Social Democrats often saw Swedish neutrality between the superpowers as part of a sort of global mission for the party and the country. That mission was regarded as incompatible with membership of the nascent EU.

Much changed when the cold war ended. Sweden joined the EU in 1995, after which the country's security strategy was defined as nonalignment (*alliansfrihet*) rather than neutrality. Opponents of EU accession, which was only narrowly approved in an advisory referendum, were mostly on the political left, often driven by wariness of the Union's supposed free-market economic policies and closeness to an allegedly militaristic America. That opposition to the EU abated steadily after accession. Yet it was somewhat revived in 2003, when a Social Democratic government sought to win approval in another referendum of Swedish entry to European Monetary Union. Swedish voters chose, by a comfortable margin, to reject the advice of its political elite and retain the krona. This created an informal bloc of three EU countries – Britain, Denmark and Sweden – that had chosen not to adopt the euro.

Sweden-UK relations became warmer still in the following years, as Europe slowly recovered from the recession sparked by the financial crisis of 2008. Between 2011 and 2018, a 'Northern Future Forum' brought together heads of government from Britain, the Nordic and Baltic countries to discuss common matters of interest. This rather intermittent gathering was sometimes seen as an alignment of member states that were orientated towards a more open and Atlanticist view of the EU's development. In 2010-14, relations between the British and Swedish prime ministers, David Cameron and Fredrik Reinfeldt, both of whom led centre-right liberal-conservative parties, were seen as particularly close.

Brexit upset some parts of the relationship. The legal status of tens of thousands of Swedes who were living in the UK, and a smaller but significant number of Britons in Sweden, was of immediate concern. It is worth noting that, while migration has become a very sensitive political issue in both countries, migration between the UK and Sweden, two relatively rich West European countries, had never been remotely controversial in either. These problems were subsequently resolved in the Withdrawal Agreement, which involved the possibility of Swedes (like other EU citizens) in the UK applying for 'settled status' and Britons in Sweden applying for a permanent-residence permit by the end of 2021. Inevitably, however, information about the need to apply did not reach all affected people. Apparently, hundreds of British citizens were deported from Sweden in the years that followed Brexit – perhaps an example of rather typically excessive Swedish bureaucratic zeal.

Overall, however, ties between the UK and Sweden remained firm and friendly. Despite the added complications of trading with a non-EU state, the UK is still Sweden's <u>seventh-biggest export market</u>.

Moreover, close bilateral ties were not only focused on the EU. An area in which co-operation has been steadily enhanced was that of security, in which the EU is still only weakly involved. In 2010, Britain initiated the Northern European Defence Policy Forum (the 'Northern Group'), which includes the eight Nordic and Baltic countries, Germany, the Netherlands and Poland. In 2012, Britain proposed a Joint Expeditionary Force, a military partnership that provides forces for rapid-reaction and expeditionary missions and which also enrolled smaller North European countries. Sweden signed up to the force in 2017. In 2019, the two countries <u>agreed</u> jointly to develop warplanes.

In 2022, Britain and Sweden were suddenly pulled even more closely together by the shock of Russia's invasion of Ukraine. The Swedish prime minister, Magdalenda Andersson, a Social Democrat, initially sounded wary of taking any steps that might, as she put it, destabilise the situation further, such as applying for NATO membership. But she soon changed her tune. Swedish public opinion, which was universally horrified by the invasion, shifted suddenly strongly in favour of joining the alliance. Still, the main cause of the Swedish government's about-turn on NATO was almost certainly the realisation that Finland was going to seek membership whatever Sweden did. Once the Swedish decision was made, anti-NATO sentiment among Social Democrats melted away.

The UK and Sweden thus became aligned. In May 2022, the British prime minister, Boris Johnson, travelled to Stockholm to <u>sign</u> a 'Political Declaration of Solidarity' with Sweden, which was seen as a reassuring stop gap during the time in which Sweden's application to NATO was being processed.

As it happened, Swedish accession to the alliance was obstructed by its tense relations with Turkey, an existing member state – Turkey had previously complained that Sweden was indulgent of Kurdish activism on its territory and Andersson's government had also become dependent on a maverick parliamentarian, whose pet cause was support for Kurdish militia in Syria. Accession was completed only in spring 2024, long after Finland had joined. Yet this delay prompted little domestic political dissent about the process, despite the concessions that Swedish governments were forced to make to what many regarded as an authoritarian Turkish president. After the Swedish parliamentary election of September 2022, a centre-right coalition took office. All three of its parties had long supported NATO membership. In October 2023, the British and Swedish prime ministers, Rishi Sunak and Ulf Kristersson, signed a 'Strategic Partnership', which, according to the Swedish Ministry of Foreign Affairs, 'builds on the two countries' common interests and values, and aims to deepen and broaden their cooperation.

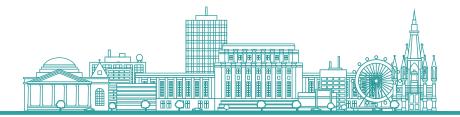
Future relations

For many decades, domestic politics in the UK and Sweden have worked very differently. Swedish coalition and minority governments have tended to be left-oriented while British single-party majority governments have more often been anchored on the right. Yet such political differences have not caused difficulty in relations between the countries. There is no reason to expect that to change in the event of a Labour victory in the British election in July 2024. The same assumption would apply in the event of a Swedish change of government in 2026, after the next scheduled election. The UK and Sweden look set to remain close allies and partners.

For a while, Brexit did complicate the relationship, and not only because of the practical matters of residency and trade. Some Swedes feared that the contagion of Euroscepticism might spread from Britain after 2016. A few, particularly among the radical-right Sweden Democrats, hoped that it might do so. In fact, though, the reverse seems to have occurred. Swedish voters and most parties are still cautious about commitment to further integration, such as adopting the euro. But voters who want Sweden to emulate Britain and leave the EU now comprise a very small minority. They number fewer than one in ten, according to an exit poll undertaken during the 2024 election to the European Parliament. The UK's status outside the Union, and Sweden's status within it, seem settled; and the political elites in each country recognise that. A potential cause of political conflict within and between the two countries is thus obviated. Any future policy differences between the two countries on policy issues that are subject to EU competence, such as enlargement or environmental protection, will no longer require conciliation within the EU framework. The UK will simply have nothing to say about them.

For many years, different but non-conflicting orientations also characterised Sweden-UK relations in the field of security. Now, the two countries have NATO membership in common. They also now share very similar outlooks on geopolitical issues. In the Strategic Partnership of 2023, the UK and Sweden agreed, for example, to 'continue to cooperate closely on responding to China as a systemic challenge'. More urgently, a strong, shared commitment to support Ukraine in its war with Russia is emphasised repeatedly in the joint declaration. Moreover, that support is subject to near consensus in the domestic politics of each country – which cannot be said of the EU's three biggest states, France, Germany and Italy. This suggests that any difficult decisions about security – in light of, say, developments in the war in Ukraine or, for that matter, the result of the American presidential election in November – are likely to be interpreted and addressed similarly in the UK and Sweden.

Switzerland



René Schwok

Background

In the years following the UK referendum, many in Switzerland hoped that Theresa May would succeed in negotiating a soft Brexit, and that the UK would obtain some form of integration into the EU's internal market, albeit without continued EU membership. There were hopes that the UK would leverage its economic and political power to secure a superior institutional framework to the one the EU has been trying to impose on Switzerland for the last twenty years.

In Switzerland, this was known as the 'snowplough' theory; the UK's negotiations would ease the way for Switzerland and <u>strengthen</u> Switzerland's hand in its own negotiations with the EU. Instead, following Theresa May's failed attempts at negotiating a soft Brexit, her successors opted for minimal formal relations with the EU. The EU-UK Trade and Cooperation Agreement (TCA) is <u>very modest</u> compared to the <u>bilateral agreements</u> between Switzerland and the EU.

At a bilateral level, the Swiss government views a good relationship with the UK post-Brexit as an opportunity to work with a close European partner outside the EU framework. Moreover, an enhanced free trade agreement (FTA) with the UK post-Brexit would also allow for closer cooperation on common interests and global challenges.

Bilateral relations

A champion of free trade and pragmatism, Switzerland shares many values with the UK and considers the UK a like-minded partner in many areas. Both countries have advanced economies with high standards, boast large financial sectors, are world leaders in research and innovation, and share a strong engagement on sustainable development.

Switzerland is one of the UK's most important trading partners. Total trade between the UK and Switzerland was worth 55.2 billion pounds in 2023. Total UK imports from Switzerland <u>amounted to</u> 19.3 billion pounds. Total UK exports to Switzerland in 2023 <u>amounted to</u> 35.9 billion pounds. To put these numbers in perspective, <u>total UK exports</u> to China amounted to 37.5 billion pounds, to Japan, 13.7 billion pounds and to India 14.9 billion pounds. The volume of trade has also increased since 2021 (see Figure 1).

Figure 1

Source: ONS, UK trade in goods and services, Q4 2023

Switzerland is also the UK's third largest services trading partner. In 2023, Switzerland was the eighth largest direct investor in the UK, with the total stock of Swiss foreign direct investment (FDI) worth 74 billion pounds. Switzerland was also the <u>ninth largest destination</u> for UK outward FDI in 2021 (52 billion pounds).

Bilateral relations

Since the Switzerland-EU bilateral agreements ceased to apply to the UK at the end of the Brexit transition period, both countries have negotiated a series of follow-up agreements. These were negotiated as part of Switzerland's so-called 'Mind the Gap' strategy (including 'Mind the Gap+').

• The Agreement on Trade (signed on 11 February 2019) transferred several existing trade and economic agreements with the EU to the relationship between Switzerland and the UK. This includes the 1972 Free Trade Agreement, the 1999 Agreement on Government Procurement, the 1999 Agreement on Mutual Recognition in relation to Conformity Assessment (MRA), the 1999 Agreement on Agriculture, the 2004 Agreement on Combating Fraud, and the 2009 Agreement on Customs Facilitation and Security. The Trade Agreement came into force on 1 January 2021.

However, some of the aforementioned agreements, or parts thereof, are predicated on an alignment of rules between Switzerland and the EU. As a result, they do not apply to the relationship between Switzerland and the UK for the time being. They will only apply once the EU and the UK agree equivalent terms based on harmonised standards. This applies to the Customs Facilitation and Security Agreement, certain sectors under the Agricultural Agreement (e.g. veterinary standards), and most sectors under the MRA agreement, excluding motor vehicles, good laboratory practice, and good manufacturing practice for medicines (which account for two-thirds of trading volume). The diagonal cumulation of origin of goods is not guaranteed either, as the EU and the UK have agreed on a strictly bilateral system; this system has negative repercussions on certain existing value creation chains in which Switzerland participates.

- The <u>Agreement relating to Scheduled Air Services</u> signed on 17 December 2018 ensures that existing air transport rules continued to apply in full, allowing air carriers to retain their current traffic rights. The agreement came into force on 1 January 2021.
- The Agreement on the International Carriage of Passengers and Goods by Road allows carriers to continue transporting goods without requiring an authorisation and ensures the continued transportation of people and goods between the two countries. The agreement came into force on 1 January 2021.
- The Agreement on Direct Insurance other than Life Insurance signed on 25 January 2019 allows Swiss insurance companies active in direct insurance, to operate and establish branches in the UK and conversely for British insurance companies. The agreement came into force on 1 January 2021.
- Switzerland and the UK signed a Citizens' Rights Agreement on 25 February 2019 that protects the rights of Swiss citizens living in the UK which they acquired under the Agreement on the Free Movement of Persons (AFMP) such as residency rights, social security entitlements and the recognition of professional qualifications. Reciprocal conditions apply to UK citizens in Switzerland. As the approval process is still ongoing in Switzerland, the Citizens' Rights Agreement has applied on a provisional basis since 1 January 2021. In relation to social security, the agreement provides for a decision by the Swiss–EU Joint Committee under the AFMP, which extends the protection of rights to citizens of EU member states.

Regarding the mutual recognition of professional qualifications, individuals who have not yet submitted an application or who have started training towards, but not yet obtained, the relevant qualification may apply for recognition of their qualifications by 31 December 2024. Applications will be reviewed in accordance with the criteria laid down in the AFMP. In this respect, nothing will change in the short term for Swiss and British nationals compared to the pre-Brexit situation.

- The Services Mobility Agreement (signed on 14 December 2020) sets out the terms of mutual access and temporary stays for Swiss and British service providers, i.e. natural persons, such as IT specialists and engineers, supplying services in the other country. British service providers have access to the Swiss market for periods not exceeding 90 days per calendar year, while Swiss service providers have access to the UK market for periods not exceeding 12 months in any 24-month period through market access commitments for over 30 services sectors and other preferential terms. The agreement also contains provisions on the mutual recognition of professional qualifications. The agreement applies on a provisional basis from 1 January 2021.
- On 14 April 2021, Switzerland adopted the agreement on the mutual recognition of authorised economic operators (AEOs) with the UK. The agreement is designed to make it easier for Swiss companies with AEO status to trade with the UK and vice versa, and to reduce technical barriers to trade. Companies with AEO status are considered particularly trustworthy, which is why they enjoy privileges in security-related customs controls and are entitled to simplified customs clearance. The agreement entered into force on 1 September 2021.
- An agreement on Police Cooperation was signed on 15 December 2020 to strengthen and develop cooperation with the British police authorities, particularly in the fight against organised crime and terrorism. The agreement enhances public security in both countries and further expands Switzerland's relationship with the UK (Mind the Gap+, see below). The agreement entered into force on 14 October 2021.
- The agreement on coordination of social security ensures largely equal treatment for insured people and facilitates access to social security benefits. It also aims to avoid over insurance and insurance gaps for people who come into contact with the Swiss and UK social security systems. The agreement has been provisionally applied since 1 November 2021.

On 30 June 2020 the two countries issued a joint statement regarding closer cooperation on financial services. They confirmed their willingness to sign an agreement to open up cross-border market access to a wide range of financial services in the areas of insurance, banking, asset management and financial market infrastructure. But despite <u>announcing</u> the signature of the Berne Financial Services Agreement in December 2023, the agreement has not been ratified by the Swiss and UK Parliament as there are a few difficulties.

Switzerland and the UK issued another statement on 21 December 2020, which sets out their intentions to explore ways to enhance cooperation on migration following the signature of a <u>Memorandum of Understanding</u> on 18 December 2020 to strengthen bilateral cooperation on mobility and migration.

Future relations

Switzerland's 'Mind the Gap+' strategy provides for possible further developments in the relationship with the UK. Discussions are currently ongoing regarding possible areas for enhanced cooperation where the two countries have common interests.

Meanwhile, the fourth round of negotiations on a UK-Switzerland enhanced FTA took place from fourth to eighth of March 2024. The fifth hybrid round of negotiations is expected to take place early summer 2024, possibly under a new government in the UK.

Both countries are focusing on achieving a modern and comprehensive agreement with ambitious outcomes, including in areas such as services and investment, mobility, digital and the environment, which are not covered by the existing FTA. Currently, trade in services and investment between the UK and Switzerland takes place on World Trade Organization (WTO), a minimum baseline.

With services <u>representing</u> over 70 per cent of GDP for both economies, there are significant opportunities to increase trade. Moreover, a new FTA also provides an opportunity to strengthen collaboration and drive innovation in areas of future economic growth, such as digital trade and data, green growth and emerging technology.

The current FTA agreement fully liberalises 79 per cent of import tariffs into Switzerland - Switzerland would be happy to remove all tariffs on goods and decided in January 2024 to eliminate tariffs on all goods coming from all over the world, except agricultural goods and some processed agricultural products. A new FTA would be an opportunity to pursue further trade liberalisation and reduce or remove tariffs and quotas on agricultural goods as well as work together to raise global standards. Swiss tariffs on some products, such as red meat, chocolate and baked goods, are currently very high, with businesses describing them as a key barrier to trade. It would also an opportunity to modernise trading rules, simplify bureaucracy and digitalise customs procedures to make it easier for businesses, particularly small and medium enterprises (SMEs), to trade with Switzerland.

Beyond negotiations on the enhanced FTA, Switzerland would look forward to improved cooperation between the UK and EU under a new UK government. More specifically, it would prefer the UK to regain a level of integration with the EU's internal market comparable to that enjoyed by Switzerland.

However, Switzerland has never supported a customs union, nor the idea of a common external tariff. Consequently, although the Federal Council would never say so officially, it is not in favour of the UK negotiating a customs union with the EU as advocated by some, but not all, members of the Labour Party.

'Living with the Neighbours' explores relations between the UK and its European neighbours. As part of the project, a cross-national Observatory brings together distinguished experts from across Europe to provide commentary on how the UK and its relations with its neighbours are viewed. 'Living with the Neighbours' is led by Professor Hussein Kassim, ESRC Senior Fellow under the 'UK in a Changing Europe' initiative, with Dr Cleo Davies, Senior Research Fellow and Dr Pippa Lacey, Administrative Assistant, at the University of Warwick.









