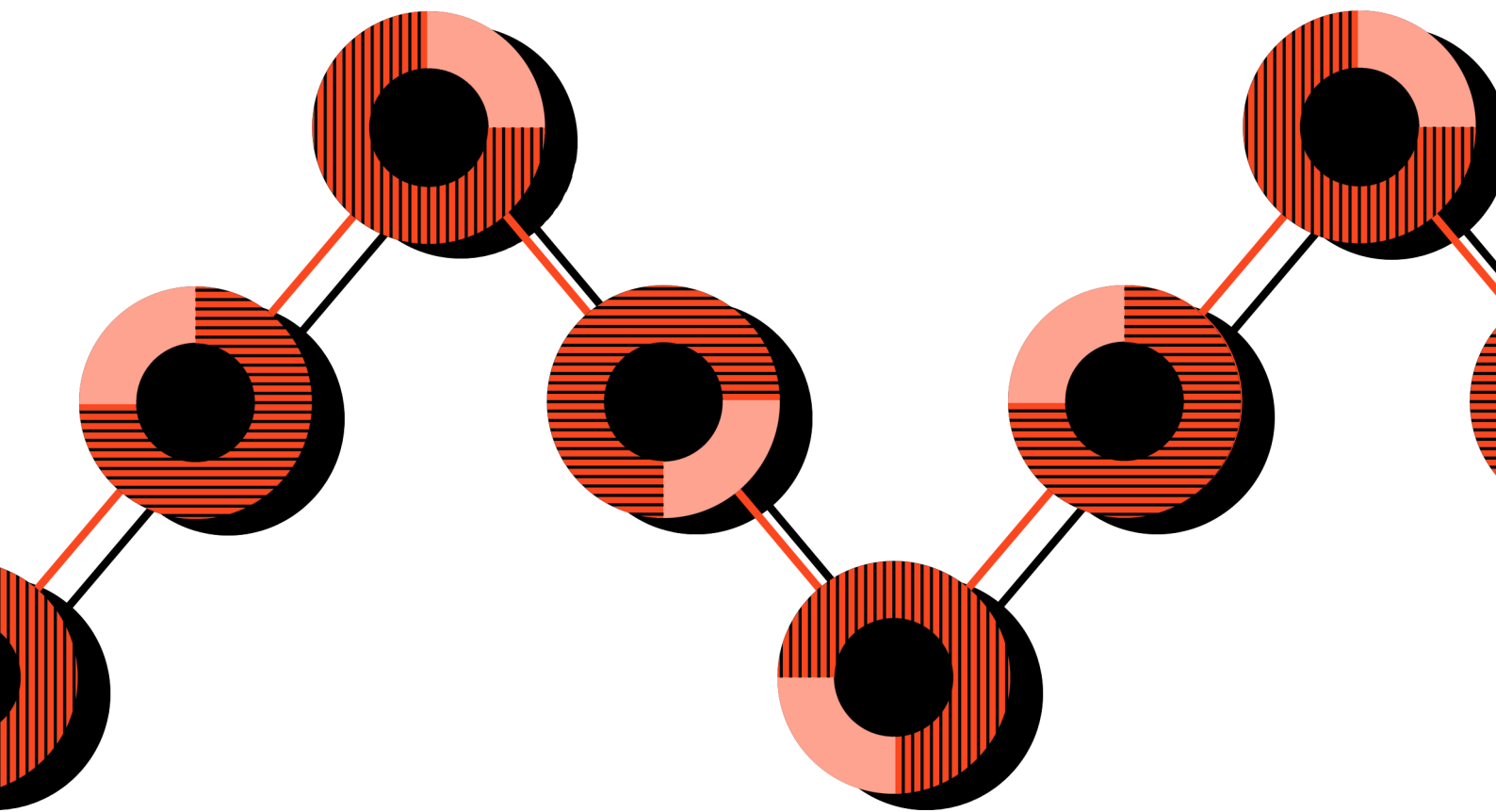


UK IN A
CHANGING
EUROPE

UK-EU RELATIONS
TRACKER
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INTRODUCTION

This edition of the UK in a Changing Europe UK-EU Relations Tracker covers developments from July to September 2023.

As a crucial step in implementing the Windsor Framework, the UK government on 1 October introduced the green-lane/red-lane system to ease the flow of goods between Great Britain and Northern Ireland. In the context of thawing relations post Windsor Framework, the UK and EU have reiterated their commitment to making the most of the Trade and Cooperation Agreement (TCA). The political agreement on the UK's association to the Horizon and Copernicus programmes was an important milestone. Moreover, the UK-EU financial services forum met for the first time on 19 October.

In other areas, discussions are ongoing. The two parties inched closer to a compromise on pausing the introduction of stricter rules of origin to avoid 10% tariffs for electric vehicles. Beyond the TCA, the UK's participation in an EU-led defence capability project to enable the swift movement of military personnel and equipment across borders has been held up by disagreements with Spain.

On the future of the relationship there is a growing mismatch between debates on the two sides. Within the UK, the Labour Party have set out plans for building on the TCA in pursuit of a closer trading relationship. The EU, on the other hand, shows little appetite for revisiting the terms of UK-EU trade. As EU leaders have welcomed the normalisation of relations with the UK, it has also slipped down their list of political priorities.

Bilaterally, the UK has now signed general statements or declarations (which typically cover several policy areas) with most EU member states. The focus is therefore shifting from formalising relations to maintaining and implementing them. This requires continued engagement, which can be difficult to sustain at the highest political level.

WITHDRAWAL AGREEMENT

The Withdrawal Agreement (WA) establishes the terms of the UK's withdrawal from the EU, including the status of citizens in both the UK and the EU and arrangements for Northern Ireland under the Protocol and Windsor Framework. It is underpinned by a comprehensive governance structure.

COMMITTEE MEETINGS

The Joint Committee, which supervises and facilitates the implementation of the WA, has met three times this year (24 March, 3 July, 28 September). It is convened at the request of the UK and EU **'at least once a year'**. The Specialised Committee on the Implementation of the Windsor Framework (one of six committees which oversee the implementation of specific parts of the WA) has held four meetings since the Windsor Framework was agreed. Observers **see** this as a 'revival and normal operation' of the WA's structures post-Windsor. Both committees had met only once in the previous 18 months.

The Joint Committee published its Annual Report (covering 2022) in July. It **describes** the WA's framework as a 'stable basis for dialogue and cooperation [...] to facilitate the implementation and application of the [WA] and to seek solutions to outstanding issues'.

NORTHERN IRELAND

In September, Commission Executive Vice-President Maroš Šefčovič, Northern Ireland Secretary Chris Heaton-Harris and the Irish Taoiseach Leo Varadkar, launched the **PEACE plus fund** for Northern Ireland and the border counties. This is a continuation of previous EU programmes to support peace and reconciliation in Northern Ireland. The £1 billion fund is co-financed by the EU's European Regional Development Fund and the UK government (as agreed in the WA), with contributions from Ireland and Northern Ireland.

On 1 October the **new green-lane/red-lane system** for agri-food products entering Northern Ireland from Great Britain became operational. It entails fewer checks and controls for products that are destined only for Northern Ireland. The full implementation of the Framework is happening in stages through to 2025.

The new arrangements have not resulted in a restoration of devolved government in Northern Ireland, with the Democratic Unionist Party (DUP) continuing to **express concerns** about what the Framework means for Northern Ireland's position in the United Kingdom. Whilst discussions between the party and government officials are ongoing, DUP leader Jeffrey Donaldson reiterated in his conference **speech** on 14 October that he would 'not be afraid to say no' to re-establishing power-sharing arrangements if Unionists' 'fundamental concerns' were not addressed.

CITIZENS' RIGHTS

As of March 2023, the UK government has processed more than 7 million applications under the **EU Settlement Scheme (EUSS)**. As part of the UK's obligations under the WA, the Independent Monitoring Authority for Citizens' Rights Agreements (IMA) was set up to ensure the rights of EU and European Economic Area/European Free Trade Area citizens.

In September, the IMA **launched** an inquiry into delays with EUSS applications. That same month, the Home Office **responded** to a previous inquiry into delays with the issuance of Certificates of Application. These are required to evidence rights, for example to work, whilst an application is pending. The Home Office accepted the IMA's recommendation to collect data to monitor processing times, however, rejected calls for a service standard of five working days for certificates to be issued.

This summer the Home Office **confirmed** that, from September 2023, pre-settled status holders will automatically have their status extended by two years before it expires. It will also conduct automated checks during 2024 to upgrade as many eligible people as possible from pre- to settled status. The announcement followed a 2022 High Court judgement that it was unlawful for pre-settled status holders to lose their rights if they failed to upgrade their status within five years of obtaining it.

The IMA, which had initiated legal proceedings against the Home Office, **welcomed** the announcement but said further detail is required. For example, it is **unclear** what happens if those that fall through the cracks of the automated upgrades (like those in precarious jobs and children without the required digital footprint) fail to re-apply after the two-year extension.

OPERATION OF THE TCA'S INSTITUTIONAL FRAMEWORK

The UK has continued to engage with the EU through the TCA's formal structures. The Partnership Council, the main body overseeing TCA implementation, is supported by a range of topic-specific committees which meet throughout the year.

PARTNERSHIP COUNCIL

On the EU side, Maroš Šefčovič, the Commission's Executive Vice-President, is responsible for co-chairing the Council and representing the EU on it. Following the resignation of Commission Vice-President Frans Timmermans to run in the Dutch elections, Šefčovič has been tasked with the implementation of the European Green Deal in addition to his existing duties. The considerable expansion of Šefčovič's **portfolio** suggests less bandwidth to think about UK-EU relations (at least at the highest level in the Commission).

SPECIALISED COMMITTEES

The Committee on Fisheries (SCF) held the seventh meeting since its inception on 22 September. This Committee meets much more frequently than the other seven Specialised Committees, which meet once or, more rarely, twice a year. This was agreed at the [first SCF meeting](#) to allow for discussions ahead of international negotiations on the management of stocks for the following year. Most of these take place annually in the autumn.

Several of the Trade Specialised Committees held the third round of meetings since their inception in September and October (Trade Specialised Committee on Customs Cooperation and Rules of Origin on 27 September, Trade Specialised Committee on Level Playing Field for Open and Fair Competition and Sustainable Development on 4 October, Investment and Digital Trade on 9 October, and Trade Specialised Committee on Sanitary and Phytosanitary Measures on 11 October).

In a [report](#) published at the end of April, the House of Lords European Affairs Committee emphasised that to date most TCA committees had met ‘infrequently and considered little substantive business’. It recommended a considerable increase in activity and closer involvement of UK ministers and EU Commissioners, particularly in key areas such as trade and energy. In its [response](#) from 28 June, the government described the institutional structure as functioning well, and whilst it noted the committees’ importance, it also pointed out that ‘the intensity of contact [...] with the EU should not be expected to be the same as when we were an EU Member State, nor a measure of the TCA’s success’.

PARLIAMENTARY PARTNERSHIP ASSEMBLY

The Parliamentary Partnership Assembly, made up of 35 members each from the European Parliament and the UK Parliament (21 MPs and 14 Peers), held its third meeting on 3-4 July in Brussels. The Assembly can request information and make recommendations to the Partnership Council. This time it issued a [recommendation](#) on Ukraine, calling for increased UK-EU cooperation on information-sharing, implementation and enforcement of sanctions. Assembly members also [discussed](#) the ‘huge potential’ for UK-EU cooperation on climate and energy and proposed a new specialised committee on net zero (which could be established by the Partnership Council).

ONGOING TCA IMPLEMENTATION

The **UK** and **EU** published reports on TCA implementation in 2022. Both confirmed their commitment to maximise the TCA's potential by acting on as-yet unfulfilled provisions.

EU PROGRAMMES

A major milestone was achieved on 7 September, with the EU and UK reaching a political **agreement** on the UK's participation in Horizon Europe, the EU's research and innovation programme, and Copernicus, the EU's Earth observation programme. The UK's association was foreseen in the TCA but had been on hold because of wider tensions in the relationship. Despite eagerness on both sides to advance discussions following the breakthrough on arrangements for Northern Ireland in February 2023, it took more than six months to agree the details of association.

RULES OF ORIGIN

The UK and EU also inched closer to a compromise on the tightening of rules of origin for electric vehicles foreseen in the TCA. These specify what proportion of an electric vehicle's content must originate from the UK or EU to qualify for tariff-free trade. The UK has requested a three-year delay to the introduction of stricter rules, which are scheduled to take effect from 2024.

After several months of gridlock, the Commission announced its intention to consider a one-year postponement by reviewing its definition of 'locally sourced from the EU'. This follows increased pressure from industry. The European Automobile Manufacturers' Association (ACEA) - which represents the 14 major Europe-based car makers - **argued** tariffs could cost car makers up to €4.3 billion over three years and drive-up consumer prices for European electric vehicles. UK manufacturer Stellantis **delivered** a similar message earlier this year, warning that it may have to close operations in the UK if stricter content requirements are imposed.

The EU's preference for a one-year delay reflects a strand of thinking within the Commission - supported by France and internal market Commissioner Thierry Breton - according to which a longer delay would be detrimental to the development of a European battery industry. However, internal debates were split. The German government and EU trade commissioner Valdis Dombrovskis **reportedly** supported a longer postponement. Given diverging interests on the EU side, its final position is likely to reflect the lowest common denominator between member states and the Commission.

TCA REVIEW

In a recent interview, Labour leader Keir Starmer **identified** the mandatory five-year review of the TCA as an opportunity to get 'a closer trading relationship' with the EU. Labour has compiled a

list of **proposals** to build on the agreement, ranging from a veterinary deal to mutual recognition of conformity assessments and professional qualifications, improved labour mobility arrangements, and a security pact.

Whilst Starmer wants to use the review to this end, the European Commission has been clear that it sees it as a light-touch stocktake of the TCA's implementation, not an opportunity to revisit the agreement. As our recent **report** argues, the EU is broadly satisfied with how the TCA is functioning. There is also significant Brexit fatigue in Brussels, trust in the UK remains low, and the EU has a long list of higher priorities. The onus will therefore be on the UK to persuade the EU to come back to the negotiating table.

UK ANNOUNCEMENTS ON POST-BREXIT RULES AND CONTROLS

Over the summer the UK government further delayed the introduction of new post-Brexit rules and systems. In July it **announced** an indefinite extension to the use of the CE (Conformité Européenne) mark. This is used in the European Economic Area (EEA) to confirm that products meet safety, health, and environmental protection requirements. The UKCA (UK Conformity Assessed) mark **was set to replace** the CE mark from December 2024. However, it would not have been recognised in the EEA, so UK based exporters would have had to absorb the cost of applying for both. The decision to accept the CE mark alongside the UKCA mark was made in response to pressure from businesses concerned about the additional red tape involved.

In August, the UK government decided to further delay post-Brexit border controls on animal and plant products coming from the EU. Rather than introducing checks from October, it will phase in its Border Target Operating Model in three stages from January 2024. This is the fifth time the UK government has delayed full border checks for imports from the EU (**March 2021, September 2021, December 2021, April 2022, and August 2023**). The latest postponement followed Treasury concerns about fuelling inflationary pressures. This has **caused** frustration amongst UK farmers who have had to deal with full checks when exporting to the EU since 1 January 2021. The industry says border controls would even the playing field with EU competitors as well as mitigate risks to UK biosecurity. Moreover, absent these checks, the EU has little incentive to negotiate the kinds of agreement on plant and animal health standards that Labour seems to favour.

UK-EU COOPERATION BEYOND THE TCA

FRONTEX

In May, the EU and UK **announced** they would ‘develop[...] a new working arrangement between UK agencies and Frontex’, the **European Border and Coast Guard Agency** responsible for coordinating the border security of the Schengen area. As a non-Schengen EU member, the UK never fully participated in Frontex. However, it attended Frontex Management Board meetings as an observer and participated in operations on a case-by-case basis following approval by an absolute majority of the Management Board. This included exchanges of border surveillance data. Prime Minister Rishi Sunak and European Commission President Ursula von der Leyen announced that the UK and the EU would try to negotiate a new arrangement after a bilateral meeting on the sidelines of the Council of Europe summit in Reykjavik in May.

There is precedent for a non-EU-country to coordinate with Frontex: eighteen other states have working arrangements enabling coordination on a range of areas from information exchange to participation in operations as observers. According to media **reports**, an agreement between the UK and EU is imminent.

FOREIGN AND SECURITY COOPERATION

The TCA does not include a chapter on foreign and security policy or defence. Whilst the 2019 Political Declaration on the future relationship between the UK and the EU did foresee ‘a broad, comprehensive and balanced security partnership’, the idea of a formalised relationship in this area was rejected by the Johnson government in early 2020. The treaty provides for regular dialogues in a limited number of areas, with the ones on cyber security and counter-terrorism expected to meet for the first time this autumn.

The Russian invasion of Ukraine has dramatically **changed** the security situation in Europe. The UK and EU closely coordinate both their respective programmes for the training of the Ukrainian armed forces and their sanctions on Russia. There is also coordinated outreach to middle ground countries, including joint **visits** by the EU Sanctions Envoy and the Director of the UK Sanctions Directorate.

However, the intensification of ad-hoc collaboration has apparently not increased the likelihood of a formalised relationship. The Financial Times **reported** in July that the UK government had turned down an offer for more formalised cooperation on global issues from European Council President Charles Michel.

The Conservative government’s rejection notwithstanding, an increasing number of voices

have advocated a formalised relationship, including **Michel Barnier** and members of the EU-UK Parliamentary Partnership Assembly. The Labour party has proposed a '**new security pact**', including structured dialogue on a biannual or quarterly basis.

DEFENCE COOPERATION

The UK has been seeking participation in the Dutch-led project to ensure cross-border mobility of troops and equipment within the framework of Permanent Structured Cooperation (PESCO). Norway, Canada and the US joined the project in 2021. The Council of the EU **authorised** the Netherlands (as the project coordinator) to formally invite the UK to participate in the project in November 2022. However, no agreement has been reached as yet. Whilst Armed Forces Minister James Heappey **told** the House of Commons in June 2023 that agreement was close, it seems to have been held up by disagreements between the UK and Spain over Gibraltar.

Addressing the UK-EU Parliamentary Assembly, Lord Mandelson, **urged** both sides to go further and the EU to look again at 'rules which preclude third countries' meaningful participation in defence projects supported by the EU budget', a policy which was driving the UK to focus on collaboration with the US, Japan, and Australia. Currently, the rules governing the European Defence Fund are drawn up to focus on strategy autonomy and the development of EU capacities, at the expense of cooperation with third countries.

BILATERAL RELATIONS

The UK has signed general non-binding agreements with almost all EU member states. Recently, the focus has shifted to sectoral agreements, particularly on security, energy, and on tackling irregular migration flows. In July, the UK [signed](#) a detailed security agreement with Poland which covers both regional and global policy objectives, and cooperation on military capability, training, and cyber and state threats. However, apart from efforts to secure member state support in stemming the flow of small boats crossing the Channel, Sunak and his government have taken less interest than in the first months of his premiership in deepening bilateral relations, leaving it to officials.

Table 1: Joint Statements/Declarations/Memoranda of Understanding/ International Treaties signed 2021 - present. The table is indicative and does not include all bilateral agreements signed between the UK and EU member states.

MEMBER STATE(S)	AGREEMENT TYPE	POLICY AREA	DATE SIGNED/ ISSUED	TEXT
2021				
Germany	Joint Declaration	Foreign And Security Policy	June 2021	GOV UK
Ireland	Memorandum Of Understanding	Education	July 2021	GOV UK
France	International Treaty	Maritime And Port Security	July 2021 (Entry Into Force May 2023)	GOV UK
Belgium	Joint Declaration	Bilateral Cooperation	November 2021	GOV UK
Greece	Memorandum Of Understanding	Strategic Bilateral Framework	November 2021	GOV UK
Latvia	Joint Declaration	Trade And Technology, Cyber Security, Democratic Values	December 2021	GOV UK
Denmark	Joint Declaration	Defence	December 2021	GOV UK
2022				
Slovenia	Joint Statement Of Intent	Bilateral Cooperation	February 2022	GOV UK
Belgium	Memorandum Of Understanding	Energy Cooperation	February 2022	GOV UK

Croatia	Strategic Partnership Commitment	Defence	February 2022	GOV UK
Uk-Visegrád Group (V4)	Joint Statement	Bilateral Cooperation	March 2022	GOV UK
Poland	Partnership	Defence And Missile System	April 2022	GOV UK
Poland	Joint Leaders Statement	Bilateral Cooperation	April 2022	GOV UK
Czech Republic	Joint Statement	Foreign And Security Policy	May 2022	GOV UK
Lithuania	Joint Declaration	Bilateral Cooperation	May 2022	GOV UK
Finland	Joint Declaration	Security	May 2022	GOV UK
Sweden	Declaration Of Solidarity	Security	May 2022	GOV UK
Sweden	Memorandum Of Understanding	Life Sciences	May 2022	GOV UK
Estonia	Joint Statement	Security And Defence	June 2022	GOV UK
Portugal	Joint Declaration	Bilateral Cooperation	June 2022	GOV UK
Poland	Statement Of Intent	Arrowhead-140	October 2022	GOV UK
Poland	Memorandum Of Understanding	Air Defence Complex Weapons	October 2022	GOV UK
Cyprus	Memorandum Of Understanding	Bilateral Cooperation	November 2022	GOV UK
Estonia	Joint Statement	Defence	November 2022	GOV UK
Netherlands	Joint Statement	Foreign Policy, Development And Security	November 2022	GOV UK
France	Joint Arrangement	Tackling Small Boat Crossings In The Channel	November 2022	GOV UK
Estonia	Joint Statement	Technology Partnership	December 2022	GOV UK
Italy	Partnership	Global Combat Air Programme, In Collaboration With Japan	December 2022	GOV UK

¹ The UK has agreements to ensure the least disruption possible for the recognition of driving licences with a number of European countries. The agreements vary from one country to the next (see [GOV.UK](#)).

2023				
Italy	International Treaty	Mutual Recognition Of Driving Licences	January 2023	GOV UK
Slovakia	Joint Declaration	Security And Trade	February 2023	GOV UK
Malta	Bilateral Cooperation Framework	Foreign Policy, Security, Rule Of Law, Trade And Investment, Energy And Climate, People And Culture	February 2023	GOV UK
Italy	Joint Statement Of Intent	Bilateral Defence Cooperation	February 2023	GOV UK
Italy	Memorandum Of Understanding	Policy Dialogue For Export And Investment Promotion	February 2023	GOV UK
Greece	Joint Vision Statement	Defence And Security	February 2023	GOV UK
Estonia, Poland, Latvia, Lithuania, Denmark, Czech Republic, Netherlands, Slovakia	Joint Statement	Ukraine	February 2023	GOV UK
France	Joint Leaders' Declaration	Ukraine, European Political Community, Defence And Security, Fight Against Organised Crime, Foreign Policy And Global Issues, Energy And Decarbonisation, Illegal Migration, Social And Economic Ties	March 2023	GOV UK
France	Statement Of Cooperation	Energy	March 2023	GOV UK
France	Statement Of Cooperation	Civil Nuclear Energy	March 2023	GOV UK
Romania	Joint Statement	Strategic Partnership	March 2023	GOV UK
Czech Republic	Joint Declaration Of Intent	Police Cooperation	March 2023	GOV UK

Spain	International Treaty	Reciprocal Recognition And Exchange Of Driving Licences	April 2023	GOV UK
Croatia	Joint Declaration	Bilateral Cooperation	April 2023	GOV UK
Italy	Memorandum Of Understanding	Bilateral Cooperation	April 2023	GOV UK
Denmark	Memorandum Of Understanding	Cooperation In The Energy Transition	April 2023	GOV UK
Luxembourg	Joint Statement	Bilateral Cooperation	May 2023	GOV UK
Denmark	Joint Statement	Bilateral Cooperation	June 2023	GOV UK
Sweden	Joint Leaders' Statement	Foreign Policy, Defence And Security Cooperation, Ukraine, Deepening And Broadening Bilateral Relations	June 2023	GOV UK
Poland	Strategic Partnership Joint Declaration	Foreign Policy, Security And Defence	July 2023	GOV UK
Spain	International Treaty	Education And Access To University And Other Higher Education Institutions	August 2023	GOV UK
Germany	Joint Declaration Of Intent	Hydrogen	September 2023	GOV UK
Ireland	Memorandum Of Understanding	Energy Transition, Offshore Renewables, And Electricity Interconnection Cooperation	September 2023	GOV UK
France	Joint Statement	Climate And Nature Finance Mobilisation	September 2023	GOV UK

STRATEGIC AREAS OF COOPERATION

The last few months have seen further evidence that cooperation on energy is a shared priority of the UK and neighbouring EU member states. The UK **signed** an agreement with Germany to help accelerate the development of an international hydrogen industry and a Memorandum of Understanding (MoU) with Ireland on energy transition in September. This follows recent MoUs with the Netherlands, France, Denmark and, in 2022, with Belgium (see table 1).

Over the course of the summer, Rishi Sunak has continued to use bilateral relations with EU member states to try to tackle uncontrolled migration flows. He is expending political capital on the matter, using conversations in the margins of international summits to raise it as an issue with European partners. In spring 2023, the PM made migration a priority of his bilateral meetings with the President of the European Commission, Ursula von der Leyen, and pushed for a UK-Frontex agreement.

Rishi Sunak is keen to make the European Political Community (EPC) a forum for discussing migration. Sunak co-chaired a small working group meeting with Italian PM Giorgia Meloni at the third EPC meeting in Granada on 5 October. A **joint statement** on tackling the challenges of irregular migration was adopted with Albania, France, Italy, the Netherlands and the European Commission. Sunak also **announced** agreements with Belgium, Serbia and Bulgaria on tackling organised crime and information sharing.

The UK's agenda on migration is reflected in all bilateral declarations signed with EU member states since April 2023 (Italy, Luxemburg, Sweden, Denmark and Poland). These include a reference to the need to tackle migration flows and most also refer to a UK-Frontex agreement. However, there is little prospect of bilateral deals with member states or between the UK and the EU on returning migrants to EU member states.

IMPLEMENTATION OF BILATERAL COOPERATION IN SPECIFIC MEMBER STATES

France

At a political level, the reset of the UK-France relations following the March 2023 Summit was epitomised by the highly publicised two-day state visit of King Charles III in September. Originally scheduled for spring, it was postponed due to the unrest caused by reforms to the French pension system. In his **opening statement**, the French President remarked that the 1904 Entente Cordiale 'had never ceased to grow and spread' and that 'despite Brexit... we will continue to write part of the future of our continent'. The King became the first member of the British Royal Family to address French parliamentarians from the Senate in a **speech** in which he called for a renewal of the Entente to promote sustainability.

In terms of the ambitions listed in the Joint Leaders' statement of March 2023, UK and French ministers signed a UK-France **joint statement** related to Climate Mobilisation during the Royal visit. This builds on the commitments made at the Summit on a New Global Financing Pact in

Paris in June 2023, at which they **launched a roadmap** to promote funding for nature protection and restoration.

The third UK-France Business Forum **took place** on 11-12 July 2023 in Paris. The Forum, which was launched in June 2022 and meets biannually, focused on mobility, technology, AI, energy, and clean growth. However, little progress has been made on the commitment to facilitating youth mobility, in particular for school trips, made at the March summit. At the end of June, the UK government **indicated** that ‘work is underway to operationalise the arrangements’ but discussions are still ongoing and changes to UK legislation will be required.

Spain and Gibraltar

The UK has not yet **signed** a comprehensive bilateral declaration with Spain. However, on 3 July 2023, the UK and Spain signed a bilateral agreement on cooperation in matters of education and access to university and other higher education institutions. This follows the long-awaited **agreement** on driving licences post-Brexit, signed in April 2023. Moreover, the UK and Spain have a reciprocal agreement on **voting rights** for their respective citizens in certain elections. The series of agreements reflect the major interest in strengthening bilateral relations between the UK and Spain, in particular in areas that concern people-to-people links.

Spain is also involved in the ongoing negotiations between the UK and the EU regarding Gibraltar. The 14th round of negotiations took place in June 2023. However, formal negotiations have been on hold since Spain’s inconclusive general election on 23 July and will not resume until there is a new government and Gibraltar concludes its own general election on 12 October 2023. In recent weeks, the authorities of both Spain and of Gibraltar have carried out ad hoc controls at the border, **causing** bottlenecks and delays. In September 2023, Spanish acting Prime Minister, Pedro Sanchez, **reiterated** Spain’s commitment to reaching a UK-EU deal for Gibraltar at his speech at the UN General Assembly.

BILATERAL FORUMS OF COOPERATION

In September 2023, the 73rd UK-Germany Königswinter conference and the UK-Italy **Pontignano conference** took place. These are forums for diplomats, academics and communities of experts from each country. Both previous editions were used as platforms to signal a reset of political relations with Secretary of State for Foreign Affairs, James Cleverly, and his counterparts also involved. The latest iterations have reverted back to less high-profile events. Though ministers were present, Foreign Affairs ministers did not attend.

The UK holds similar bilateral conferences with a handful of other EU member states (Spanish-British Tertulias, Belgo-British Conference, North Sea Neighbours Conference with the Netherlands, UK-Poland Belvedere Forum).

The Franco-British Council was held in March 2023 at the margins of the UK-France Summit, and was attended by Sunak and Macron. The British-Irish Council was held in June 2023. Rishi Sunak

did not attend, having been the first UK PM to do **so in fifteen years** in 2022. Sunak used these events to signal the UK's renewed political engagement at bilateral level.

SCOTLAND'S BILATERALISM

Scotland's **ambition** is to deepen relations with the EU and member states. It is establishing a network of overseas offices in European capitals (Berlin, Brussels, Copenhagen, Dublin, and Paris) to promote its international profile and has also signed non-binding agreements. On 3 August, the Scottish government and the Regional Council of Brittany signed a **Memorandum of understanding** that covers cultural exchanges, mobility, and renewable energies. This emulates the MoU **signed** by First Minister Humza Yousaf and Minister-President of Flanders Jan Jambon on 27 June 2023, covering areas such as trade, research, culture and the environment. In July 2023, External Affairs Secretary Angus Robertson **met** with the Irish Tánaiste Michael Martin 'to mark the two years of the **Ireland Scotland Joint Bilateral Review**', launched to consolidate existing ties and identify opportunities for cooperation between 2021-25.

CONCLUSION

Following the Windsor Framework, the EU and UK appear broadly aligned in their ambition to advance the implementation of the TCA. And indeed, progress has been made in some areas. In September, the two sides agreed the long-awaited deal on the UK's participation in Horizon and Copernicus. The UK-EU Financial Forum held its first meeting on 19 October, and the regular dialogues on cyber security and counter-terrorism (as foreseen by the TCA) are expected to meet for the first time this autumn.

Within the EU, the normalisation of relations frees up bandwidth to focus on more pressing issues. Maroš Šefčovič has taken on a much-expanded portfolio in addition to his existing duties, meaning it has been left to officials to implement what is already agreed.

Whilst these structures are running smoothly, discussions are technical in nature, and leave little room for deeper political conversations. Combined with a lower intensity of contact (compared to when the UK was a member), the committee structure is not designed to facilitate greater coordination on areas of strategic sensitivity which require political input. At political level, Sunak is relying on ad hoc bilateral and minilateral conversations in the margins of international summits to discuss issues such as migration, AI, and European security.

In the bilateral sphere, this quarter witnessed a shift away from the high profile signing of comprehensive - and largely non-binding - bilateral declarations. Cooperation is happening at sectoral level and with less high-profile political involvement. The overall picture is of a more fragmented approach to the UK's bilateral relations with EU member states. In practice, despite the political reset of relations, cooperation will be less intensive as the UK faces an overall capacity gap to maintain sustained relations across all member states equally.

Finally, now that EU member states no longer perceive Brexit as an existential threat, individual vested interests will become more prominent, in turn leading to a less cohesive EU position. As just witnessed with the rules of origin debate, a lack of consensus at the EU level - where trade competences lie - makes changing the TCA more difficult. Beyond the treaty, the prolonged discussions on sensitive areas like border controls or participation in defence projects - where member states' interests do not always align - show the difficulties inherent with substantially building on the relationship.

The EU's reluctance to amend the agreement contrasts with the ambitions of the Labour Party - which according to [current polling](#) is likely to form the next government - to get a closer trading relationship by building on the TCA. This means it will be much harder to negotiate Labour's proposals than the party currently seems to think.