An annotated agenda on EU – UK trade and investment negotiations

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Tariffs

Introduction

The EU – UK negotiations are entering the phase of substantive negotiations on the type of trade and investment relationship there should on a UK exit from the EU. This series of papers seeks to promote an informed debate on the practical choices available to the EU and the UK in the negotiations. In other words, it provides an annotated agenda on the detailed substance of any agreement.

The chapters/topics covered range from customs procedures and rules of origin to dispute settlement and regulatory cooperation. These are easy to identify because they are common to all trade and investment agreements. What differs between agreements, from the Single European Market through the wide spectrum of free trade and investment agreements to the various WTO agreements, is generally not their structure but the level of ambition in terms of market integration. All entail a balance between reduced costs of trade and investment and thus economic welfare and regulatory sovereignty, however the latter is defined.

This is an annotated agenda not an attempt to provide a definitive analysis of costs and benefits of different choices. But the papers draw on existing quantitative studies where these are available and give an indication of the relative importance of one chapter/topic compared to another. For example, what is the importance in terms of the costs of doing business of tariffs compared to customs procedures?

Each paper seeks to provide an objective analysis of the political economy of the EU – UK negotiations. In other words, which interests and which party stands to gain and which to lose from any particular outcome? This assessment is based on an analysis of existing economic and political interests or preferences and policy statements where these provide a clear articulation of policy preferences. The aim here is to identify where agreement appears most likely. Needless to say any final outcome will be the result of issue linkage, in other words trade-offs both within and between the various chapters of an agreement.

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What follows is the analysis of the topic of tariffs.

Tariffs

As the second phase of Brexit is approaching, the UK and the EU will negotiate a prospective trade deal, which is expected to enter into force after the transition period ending in December 2020. One of the important issues to be negotiated in a trade deal is tariffs. Given the highly integrated supply chains between the UK and the EU, the continuation of zero-tariffs is the best scenario for both parties whether as an EEA member, in a customs union or as part of a comprehensive free trade agreement (FTA). The interests in both parties are very well aware of this fact, so they have made clear their intention to maintain the status-quo of zero-tariffs in the future. However, tariffs are just one part of the wider agreement and are usually an important component in bargaining on market access..

Tariffs, or customs duties, are the most widely known and easiest barriers to trade to identify and measure. Tariff rate quotas, which usually apply to agricultural products, provide for zero or reduced import tariffs only up to a certain quantity. Once this limit is exceeded the product concerned draws a higher tariff and often a much higher tariff.

Tariffs are important because of the complex value chains between the EU and the UK. This means multiple imports and exports of goods between these two parties throughout the production process. Tariffs on intermediate goods would therefore have a cumulative effect on final costs to the disadvantage of both producers and consumers. Failing any agreement between the EU and UK the now well known default would be WTO tariffs. While the EU (and thus the current UK) average WTO bound tariffs are very low, there are significant for some products (WTO 2017). Tariffs are therefore probably one of the easier topics to deal with in the negotiations, but need to be addressed to limit the trade costs associated with existing pan-EU wide supply chains.

Current Situation and Sectoral Interests of Both Parties

The UK is currently a member of the EU's Single Market and Customs Union so there are no tariffs applied in its bilateral trade with the EU. This has enabled both parties to develop supply chains and fragment their production processes across the Single Market. The UK applies the Common External Tariff (CET) on the imports coming from countries outside the Single Market and has preferential market access to currently 67 countries under EU's 38 different free trade agreements (Gasiorek 2018).

The negotiations that must now take place on an EU – UK trade and investment agreement that will apply after the end of the transition period in 2020 will have to address tariffs. The most important sectors for EU – UK trade and thus the most affected by tariffs are motor vehicles, chemicals, pharmaceuticals, machinery, electronics, as well as food and drinks, because these are the most important sectors in EU – UK trade. What follows is a summary of the positions of these industries in the EU and the UK that indicates the relative importance and effects of tariffs on specific sectors.

Motor vehicles:

The representatives of the UK motor vehicles sector would like to remain in the Single Market because almost 60% of the material used in production (that is non-originating material, i.e. not sourced in the UK) comes from the EU (UK Parliament 2016). Therefore, according to the British Society of Motor Manufacturers and Traders (SMMT), the introduction of UK-EU tariffs "would be hugely damaging to the UK automotive sector". Tariffs on vehicles and parts would put the UK at an immediate competitive disadvantage" (UK Parliament 2016). As well, this sector is one of the most sensitive and important sectors of the UK in all EU exit scenarios as shown by the preliminary results of the official study (UK Parliament 2018a).

The sector is also crucial for the EU. For example, over 25% of new vehicles produced in Germany are exported to the UK (ACEA 2016). A recent Deloitte Germany study (2017) has shown that the introduction of WTO tariffs of 10% on vehicles and 4.5% on car parts would have a severe impact on the German as well as British car industry. The total revenue from vehicles in the UK would fall by approximately €12.4bn (-18%), and profits by €900m. While producers from outside the EU would benefit, the revenue of car sector in the EU excluding Germany would fall by €8.3bn and that of German producers by €6.7bn (Deloitte 2017). As a result, both negotiating sides have strong economic interests in concluding an agreement on zero tariffs.

Chemicals and Pharmaceuticals:

UK sector representatives of chemicals and pharmaceuticals also seek the continuation of zero tariffs (UK Parliament 2016). While WTO tariffs for chemicals and pharmaceuticals are low (for example, 4.5% for chemicals in the EU) (WTO 2017), the SEM has also facilitated a pan EU supply chain in this sector. But it is not just tariffs that add to trade costs along the supply chain. The Institute of Directors (2018) representing British businesses as a whole, warns that the costs associated with rules of origin and other customs procedures at the border can outweigh the benefits coming from a possible tariff-free trade deal for chemical industry. This is also true for pharmaceuticals in which intermediate pharmaceutical products are exchanged (UK Parliament 2016). The complexity of the supply chain flows can also be seen from the figures of Organisation for Economic Cooperation and Development (OECD) for 2011, "…16 per cent of the value embodied in UK chemical sector exports comes from EU-27 inputs" (UK Parliament 2018b). The major EU members -Germany, France, Spain, Ireland, Belgium, the Netherlands and Italy- account for 13 per cent of all foreign value-added in UK exports in this sector (OECD 2018). According to another study prepared by UK Government, ranking the importance of a number of sectors in terms of UK/EU market access, pharmaceuticals and chemicals are listed in the top-two most important and vulnerable sectors for the UK in all EU exit scenarios (UK Parliament 2018a). In other words, low or zero tariffs in this sector have a high priority. The introduction of WTO tariffs is expected "…to increase first order export costs by around £500 million, which would be additional to non-tariffs barriers" (UK Parliament 2018a).

The chemicals industry is at the heart of the EU's manufacturing industry that supplies two-thirds of its production to other sectors within the manufacturing industry

(European Commission 2018a). The industry is also highly regulated and therefore subject to cumulative cost effects more than other sectors. Therefore, for the EU, the final decision on tariffs of these products is linked to the agreement between both sides regarding the continuation of the status quo, namely, the alignment of the UK to the EU's REACH legislation and other technical regulations. Prime Minister Theresa May's support for the idea of the UK remaining part of certain EU regulatory agencies including those for chemicals and medicines (BBC 2018) appears to be a recognition that removing tariffs only will not provide the best possible access to the SEM.

Machinery and Electronic Products:

For machinery and electronic products, the UK industry would like to continue with zero tariffs, rather than the 2.8% on electrical machinery and 1.9% on non-electrical machinery that would apply, (WTO 2017) again because of the integrated supply chains between the UK and the EU (UK Parliament 2016). "…Around 45% of machine tools exports from the UK went to other EU countries, and 25–30% of the cost of a UK-manufactured machine tools consisted of materials and components imported from within the EU" (UK Parliament 2016). These supply chains mean the UK production is part of the wider EU industry, which is the world's largest producer and exporter of machinery with an estimated 36% share of the world market employing almost 3 million people in the EU (European Commission 2018 b). The sector faces challenges from East Asian competition (European Commission 2018 c) so the remaining EU industry will wish to ensure that the UK does not become a route into the EU market for Chinese and other competitors.

Food and Beverages:

The food and agricultural sector in the UK favour continued tariff-free access to the EU under a customs union. Again there are highly integrated supply chains across the EU in this sector (UK Parliament 2016), which also benefits from the EU's FTAs with third countries. Although the average EU MFN tariffs can be low, for cotton and oilseeds (0% and 5.6% for example), they are very high for dairy products and confectionery (35.4% and 23.6% respectively) (WTO 2017). Many agricultural products are perishable so redirecting exports from the UK to third markets will increase costs. Consumer tastes also differ so UK exporters might have difficulty finding similar markets to the EU elsewhere. Finally, the UK has significant ties with Ireland with respect to trade in agricultural goods. Therefore, sector representatives have cautioned Parliament about the danger of a hard-Brexit by saying that "…23.8% of the UK's food and non-alcoholic drink exports went to Ireland in 2015 and 10.9% of imports came from there. In some agricultural sectors this percentage could be much higher: in 2015, 68% of the UK's beef imports came from Ireland" (UK Parliament 2016). Food and agriculture are therefore central to the issue of the trade and the border between Northern Ireland and the Republic of Ireland.

From the EU perspective, it has a significant competitive advantage in agriculture compared to the UK and has enjoyed an export surplus with the UK for many years. The food and beverages sector represents the biggest manufacturing industry in the EU in terms of employment and value added (European Commission 2018 d). The SEM has also brought about common sanitary and phytosanitary and removed technical barriers to trade resulting from different food safety provisions.

The EU food and drink industry also supports continued access to the UK market (FoodDrinkEurope 2017). "For example, the implementation of WTO MFN tariffs would increase the cost of French and Irish cheeses exported to the UK by 58% and 56% respectively. Export of Italian pasta and processed vegetables would also see their costs increased by 20 and 17%. A one percent increase in price of food exported to the UK reduces quantity of exports by 4.85%." (FoodDrinkEurope 2017).

The options for a Future Deal between the EU and the UK

As is well known the UK seeks best possible access to the Single Market while safeguarding its 'red-lines' of an independent trade policy, control of borders (labour movement) and no European Court of Justice jurisdiction. The EU position is not to allow 'cherry-picking' in which the UK is able to choose where it wants the benefits of the SEM and where it does not (Miller 2017). The President of the Council, Donald Tusk, appeared to narrow the options available in an EU – UK agreement by stating that given the UK's current red lines, the only realistic option seems to be a FTA and proposed a comprehensive and zero-tariff FTA covering all sectors (European Council 2018).

The Single Market/EEA:

As mentioned above, almost all industries, and particularly the automobile sector, in the UK would like the government to continue with zero-tariffs. This is also true for many industries in the EU. Theresa May has said that the UK government does not want to have tariffs and quotas after leaving the EU (BBC 2018). For the period after Brexit, one option for frictionless trade between the UK and the EU is being a non-EU member of the SEM under an European Economic Area (EEA) type agreement. This option would maintain the current status quo of duty-free access and frictionless trade in goods covered by EEA.

However, this option would mean the UK would come under (effective) ECJ jurisdiction and lose control over the movement of labour so would fall foul of two of the UK redlines. It is worth noting that agricultural goods and fisheries are excluded from the SEM for EEA countries (Owen et al. 2017).

All in all, Theresa May ruled out this option alongside the alternative of a continued membership of the customs union (UK Government 2017) and in her speech on 2nd of March (2018), she reiterated that copying Norway's EEA model is not an option for the UK (BBC 2018). As indicated above, the EU does not envisage a future with this option and regards a comprehensive FTA as the only choice. Therefore, for the moment, this option seems to have a very low possibility.

Customs Union:

Staying in the customs union is another option, but it has been ruled out by the UK and implicitly by the EU (UK Government 2017, EU Council 2018). Although this is the case, it is in theory still on the table and there is growing support for a customs union in sections of UK opinion, so it is worth analyse. The customs union option enables tariff-free market access and no requirements to be fulfilled to meet formalities of rules of origin for the products within the customs union (Gasiorek 2018). The latter is important to maintain the status quo between the EU and the UK on tariffs and rules of origin requirements.

However, a customs union requires parties to have CET for the imports coming from outside of customs union. So the application of a CET is in conflict with the UK's red line on maintaining an independent policy in order to determine tariffs on its own. In the event of the UK being in a customs union if the EU signs an agreement with a third country after Brexit, then the UK will have to apply the lower tariffs envisaged in the agreement, whereas, the third country in the agreement does not have the same obligation (Gasiorek 2018). Therefore, the burden will be on the UK to negotiate a separate deal with the country concerned in order to have equivalent market access. This is the situation that Turkey has been experiencing because it is in a customs union with the EU.

Another important issue is the *scope* of the customs union or whether it would cover all or set zero tariffs for specific goods, such as industrial goods and processed agricultural products, as in the Turkey-EU Customs Union (European Commission 1995). A recent study for the Institute of Directors (2018), argues the latter would be the best option for the UK and the EU. However, it is highly likely that this will be perceived as a 'cherry-picking' by the EU. The Turkey – EU customs union has also not been without its difficulties for the EU, which does not favour this as an option for the UK (EU Council 2018). Indeed, Turkey and the EU have experienced a number of systemic problems because of the asymmetries and flaws within the Customs Union such as Turkey's absence from the EU's decision-making bodies pertaining to the Customs Union, Turkey's difficulties in adopting the EU's FTAs and the lack of an effective and enforceable dispute settlement mechanism. The Turkey-EU Customs Union does not cover trade in services, agriculture, government procurement and e-commerce, so in this sense, it lags behind the existing comprehensive trade and investment agreements like EU-Korea and EU-Japan FTAs. This all suggests that the Turkish model also fails to offer a favourable option.

The CETA + Option:

The EU's general approach in FTAs is to eliminate all tariffs for industrial goods either immediately or gradually, according to set schedules in the agreements. The elimination of tariffs for agricultural goods is less ambitious in most of the EU FTAs, which excludes a significant number of agricultural products. "Even EEA states' and other close neighbours of the EU, such as Switzerland, face tariffs on some agricultural products" (Owen et al. 2017).

The most advanced FTA negotiated by the EU is the EU-Canada Comprehensive Economic and Trade Agreement (CETA). CETA will eliminate almost all tariffs (99%) excluding some agricultural products (92% of which will be tariff free access at the end of a transition period) (European Commission 2017). However, "(T) here will be tariff-free quotas for a few sensitive products such as beef, pork and sweet corn granted for the EU and cheese for Canada. CETA will not open up the market for poultry or eggs in the EU or Canada, and will respect the EU's entry-price system for fruit and vegetables" (European Commission 2017).

Therefore, another option for the EU and the UK is a 'bespoke' deal beyond CETA, or CETA plus. This would almost eliminate all tariffs on manufactured products but does not quite match the EU's and the UK's current tariff-free access for all goods. The UK has therefore suggested a CETA+, which would be more ambitious and could aim to go a bit further than the CETA. As mentioned above many industries in the UK and the EU support a tariff-free trade deal. The EU position is also one that supports zero-tariffs for all sectors after Brexit (European Council 2018).

In this context, a UK-based think tank, Institute for Government, interestingly notes that such a CETA+ deal is more advantageous to the EU than to the UK in terms of commercial interests (Owen et al. 2017). The EU has a trade surplus in terms of goods whereas the UK has a trade surplus in terms of services; therefore, with a limited services coverage, a possible CETA+ option cannot satisfy the UK even if it provides a full tariff-free access to the EU (Owen et al. 2017). This is a striking argument that the CETA+ option lagging behind the current situation between the EU and the UK.

The WTO-No Deal:

The final option is returning to WTO rules and applying MFN rates. The UK's MFN bound tariffs need to be determined and thus negotiated with WTO members for the period after Brexit. Although the current average MFN rates are low for the EU (and thus the UK), there are some goods with tariff peaks, so introducing tariffs to the bilateral trade will inevitably increase the costs associated for both the importers and the consumers in general. The costs of tariffs multiplies given the existing integrated supply chains between the EU and the UK.

According to a study conducted by UK Government, if both parties revert to WTO rules, an 8% decline in GDP growth in the UK is expected to occur over the next 15 years; whereas, other, softer, options like an FTA and being a member of EEA result in a GDP decline of 5% and 2% respectively (UK Parliament 2018a). Theresa May pointed out that the UK does not want to return to WTO rules (BBC 2018). The reversion to the WTO MFN tariffs in a hard-Brexit is contrary to the preferences of industries in the UK and the EU. Therefore, the EU sees the WTO option as a remote possibility (European Parliament 2017, EU Council 2018). In addition, "(U)under WTO rules, the EU would also lose out economically, but nowhere near the same proportion as the UK — about 0.7 per cent of its overall GDP, which is $97 billion" (Ries et al. 2017), whereas it is $140 billion for the UK (Ries et al. 2017).

Assessment of Different Options:

It is easier to measure the total costs of imposing tariffs on the bilateral trade between the EU and the UK than it is for non-tariff or regulatory measures. Given that both parties are developed economies and have low average levels of MFN tariffs (WTO 2017) other trade costs associated with non-tariff barriers and customs procedures are likely to create more hurdles in the upcoming EU – UK negotiations. However, this does not mean that tariffs do not have a significant impact. On the contrary, tariffs may be an important bargaining tool, especially to get concessions in other areas.

The continuation of zero tariffs seems to be the best scenario for both parties whether as an EEA member, in a customs union or through a comprehensive FTA such as a CETA+ agreement. However, each of these models has a number of difficulties for one or other of the parties. Nevertheless, taking into account the stated positions of both sides, the most probable option would be signing an FTA with zero (or near zero) -tariffs for all sectors.

Reverting to WTO rules and MFN rates is the worst-case scenario and the least efficient in welfare terms. Obviously, given that the starting point of the negotiations is no-tariffs at all, introducing MFN rates to the bilateral trade will be a serious setback. In addition, under WTO rules the UK will lose its competitive advantage in the EU vis-à-vis the other 67 FTA partners of the EU. This poses a significant threat, at least in the short to medium term before the UK can conclude its own FTAs with these countries, and a major reason for the UK to avoid this option.

It is clear that from the economic point of view, continuing the status quo is the best option for tariffs, but political factors seem to preclude this. First, the EU may want to discourage its remaining 27 members from toying with the idea of leaving the EU in the future. Thus, the EU may decide to impose some tariffs, although, it is not meaningful and desirable for both parties in economic terms. Second, as mentioned before, the EU may want to use tariffs as a bargaining chip for the rest of the agreement. In other words in exchange for allowing zero-tariffs, the EU may limit the market access in trade in services or introduce some restrictive measures for customs procedures or other non-tariff barriers. The scope and content of FTAs are shaped by precedent. The EU will therefore be aware that offering more to the UK is also likely to be followed for demands from its other trading partners for equivalent access. Finally, the EU may have difficulties in terms of satisfying the - sometimes-conflicting - demands of individual member states. While, member states having a close trade relationship with the UK would like to be close to the status quo, others may favour more EU tariffs on UK exports.

Overall, after assessing the preferences of both sides, a CETA + seems to be the most likely outcome. Although the picture is more or less clear on tariffs, *which* scenario and *which* outcome will be the result of the negotiations remains to be seen.

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