

# Annex: The state of play on implementation of the EU-UK Common Understanding and the EU-UK Security and Defence Partnership

## Follow up to the Common Understanding

The Common Understanding is organised under five headings and almost 20 sub-headings:

### ★ Security, defence and development co-operation.

This section of the Common Understanding refers to various elements of the SDP, discussed in detail below. It also covers 'development and disaster co-operation'.

Following the Trump administration's dismantling of the US Agency for International Development (USAID), there ought to be a shared EU and UK interest in ensuring that remaining Western aid programmes are well co-ordinated to deliver maximum effect, and that countries like China, Russia and Turkey cannot use their aid and investment to undermine Western interests in the global south. China in particular is leveraging its pre-eminence as a market for commodities and as an exporter of communications technology to promote techno-authoritarianism and the surveillance state in Africa, Asia and Latin America.<sup>1</sup>

So far, however, according to officials in Brussels and London, the two parties have not even agreed on the terms of reference for discussions on development and disaster co-operation. This is partly because the way that the UK delivers aid is changing. Overall spending will fall from 0.5 per cent of GNI, the level inherited from the previous government, to 0.3 per cent in the financial year 2027-28 in order to pay for increased defence spending; and in the first instance the cuts will target bilateral development assistance to all but a small number of priority countries, while contributions to major multilateral donor organisations will continue. At the same time, the UK will provide more 'seed money' to encourage private sector donors to invest in development projects.

The European Commission takes a more traditional view of how to use development assistance. It seems to view the UK's new approach with some suspicion, and to think that the UK's aim in any dialogue will be to tell the Union how to spend its money rather than increasing its own contribution as part of a European effort to compensate for the disappearance of USAID. The result is that, despite a shared interest in continuing to use development assistance as a soft power tool, and to promote good governance and Western models of development, the UK and EU have so far been unable to combine effectively to compete with the influence of authoritarian states.

★ **Putting people at the centre of the European Union-United Kingdom relationship.** Under this heading come four items: agreement to negotiate on a 'youth experience scheme'; UK participation in the EU's Erasmus+ programme for educational and training exchanges; support for cultural exchanges (see above); and use by UK citizens of e-gates at Schengen area borders, once the EU's Entry-Exit System (EES) has been introduced.

A youth mobility scheme (which the UK has insisted on calling a 'youth experience scheme', for fear that it might be portrayed as related to freedom of movement) has been a key EU demand since before the Labour government took office. Then prime minister Theresa May had herself proposed an EU-UK youth mobility scheme as part of the post-Brexit arrangements with the EU, but her successor, Boris Johnson, and later Conservative prime ministers opposed it, preferring to limit youth mobility to citizens of specific countries.<sup>2</sup>

In April 2024, not long before the UK general election campaign began, the Commission proposed the opening of negotiations on an agreement, prompting both the Conservative government and the Labour party to reject the idea.<sup>3</sup> Though the Commission's timing seemed clumsy, the initiative was probably motivated by the UK's efforts to negotiate bilateral youth mobility agreements with some member-states while excluding young people from others; the EU was keen to ensure that there was no discrimination between member-states.

The Labour government continued to resist discussing a youth mobility scheme for some months after it took office – perhaps just as a negotiating tactic, so that it would have something to concede to the EU in return for its own demands in other areas. It was only days before the May 2025 summit that the narrative changed and the UK agreed to the principle of a 'youth experience scheme'.

The two sides remain far apart, however. The UK wants to cap the numbers able to make use of the scheme each year, while the EU wants no cap; the EU wants European students to pay the same university fees as UK residents, while the UK wants them to pay the same (much higher) fees as overseas students; the UK wants any young person from the UK to be able to travel and work freely across the EU, while the EU wants to confine each person to working

1: Ian Bond, 'China and Europe: Can the EU and the UK find a shared strategy?', CER policy brief, October 14<sup>th</sup> 2025.

2: Charley Coleman, 'Youth mobility schemes', House of Lords Library, January 27<sup>th</sup> 2025.

3: Lisa O'Carroll, Aletha Adu and Rowena Mason, 'Sunak rejects offer of youth mobility scheme between EU and UK', *The Guardian*, April 19<sup>th</sup> 2024.

4: Max Kendix, 'Labour confirms it will pursue youth mobility scheme with EU', *The Times*, May 7<sup>th</sup> 2025.

or studying in one member-state, with the right to travel elsewhere in the Schengen area (but not to work) for 90 days in every 180. About the only compromise deal the two sides seem to have reached is that visas for the scheme will last for up to three years – up from the UK's initial offer of two years, and down from the EU's opening demand for four years.<sup>5</sup> Reportedly, UK ministers aim to finalise this scheme by the end of 2026.

There has been better news on the UK's participation in Erasmus+. On December 17<sup>th</sup> 2025, the EU and the UK announced agreement on UK participation in the programme for the 2027-28 academic year in return for a UK contribution of £570 million. The UK government was keen to highlight the opportunities that Erasmus+ would offer students in further and higher education, apprentices and adult learners, including those from disadvantaged backgrounds. But it also emphasised that it had driven a hard bargain on costs, securing a 30 per cent discount in its payment to the EU by comparison with the TCA's GDP-based formula for participation in EU programmes. Since 2027-28 is the final year of the EU's current seven-year budget, the terms for the UK's participation in the next iteration of Erasmus+, for 2028-34, will have to be negotiated once the new budget is fixed. The UK government insists that it will only decide whether to renew its involvement if the next deal offers value for money.

In the post-summit press conference, Prime Minister Keir Starmer played up the ability of British tourists to use e-gates to enter the Schengen area – “ending those huge queues at passport control” – as one of the benefits gained through the Common Understanding. The rollout has been patchy, however. It is up to individual member-states to decide when to make the change, and at which border crossings or airports to permit UK nationals to use e-gates. In theory, once the EES is fully operational in April 2026 UK nationals should find it easier to enter and leave the Schengen area, regardless of where they choose to cross the border.

★ **Strengthening our economies while protecting our planet and its resources.** Under this heading come sections on energy co-operation; continued dialogue on regulatory aspects of new energy technologies (already underway as part of the TCA); working towards a common sanitary and phytosanitary area (discussed above); working towards linking EU and UK emissions trading systems; provision of services through entry and temporary stay of natural persons for business purposes; and co-operation on mergers and other competition issues.

The UK's potential integration into the EU's internal electricity market would take advantage of existing and planned generating capacity in the EU and the UK, including off-shore wind in the North Sea, and of interconnectors between the EU and the UK. It would increase the resilience of the electricity grid and energy security for both the EU and the UK, and should reduce prices for consumers.

The TCA established a mechanism for the UK and EU to continue trading electricity. It quickly became clear, however, that this was not working well. Although work on improving it has continued, parallel discussions took place before the May 2025 summit, resulting in agreement to explore the possibility of the UK rejoining the single market for electricity. Subsequent exploratory talks resulted in a joint statement on December 17<sup>th</sup> 2025 that the EU and UK would start formal negotiations.<sup>6</sup>

The joint statement indicates that in the future electricity market agreement, as in the SPS agreement, the UK will dynamically align with EU rules – in other words, when EU legislation or regulations change, the UK will update its own rules to match. Although any disputes will be resolved by an independent arbitration panel, the panel will ensure that “the Court of Justice of the European Union is the ultimate authority for all questions of Union law”.<sup>7</sup>

Though both sides agree that UK participation in the EU's internal energy market “would bring real benefits to businesses and consumers across Europe, drive up investment in the North Seas and strengthen energy security”, there is a long way to go before they are likely to agree on the terms for the UK's involvement. In particular, they disagree on the financial terms of the UK's participation in the electricity market. The agreed statement on the outcome of the exploratory talks says that the UK should make “an appropriate financial contribution ... to support the relevant costs associated with the European Union's work in this policy area”. The negotiating mandate proposed by the Commission to the Council, however, shows that the EU is looking for considerably more.

In November 2025, the Commission and the Council agreed that “should any agreement be concluded that provides for the participation of the United Kingdom in parts of the Union's internal market, they will reflect on the appropriate level of financial contribution towards reducing economic and social disparities between the regions of the Union that would reflect the level of the United Kingdom's participation in the Union's internal

5: Peter Foster and Andy Bounds, ‘EU demands no cap on youth mobility scheme with UK’, *Financial Times*, December 5<sup>th</sup> 2025.

6: ‘Joint statement by Commissioner for Trade and Economic Security, Interinstitutional Relations and Transparency Maroš Šefčovič and HM Paymaster General and Minister for the Cabinet Office the Rt Hon Nick Thomas-Symonds MP’, European Commission, December 17<sup>th</sup> 2025.

7: ‘Outcome of the exploratory discussions on the possible participation of the United Kingdom in the European Union's internal electricity market’, European Commission and gov.uk website, updated December 22<sup>nd</sup> 2025.

market". In other words, once an agreement with the UK was reached, the EU would consider whether the UK should make a contribution to the EU's cohesion policy – its financial support for poorer regions, designed to enable them to catch up economically with richer parts of the EU – as the EEA countries and Switzerland do, and if so, how much.

Although the question of UK funding beyond "supporting the relevant costs" is not mentioned in the joint EU-UK statement, the Commission's proposal for the negotiating mandate, published on December 22<sup>nd</sup> 2025, already takes it for granted that the UK will contribute to cohesion policy. The Commission's explanatory memorandum states:

"The EU aims to establish a permanent, legally binding mechanism for the financial contribution of the United Kingdom towards reducing economic and social disparities between the regions of the Union, at an appropriate level.

The financial contribution of the United Kingdom should be calculated based on the Union financial contribution towards reducing the disparities between the regions of the Union, adjusted to reflect the relative size of the UK economy and the proportion of the internal market to which the United Kingdom participates."<sup>8</sup>

The draft mandate authorises the Commission to negotiate two agreements with the UK – the first on UK participation in the internal electricity market, and the second "on the financial contribution of the United Kingdom towards reducing economic and social disparities between the regions of the Union". The draft negotiating directive attached to the mandate proposes that negotiations on the two agreements should start at the same time, and that they should enter into force simultaneously.

The TCA already included provisions on UK payments in return for participation in EU programmes and activities. The UK would pay an "operational contribution", covering the UK's share of operational and support expenditure, based on the budget for the programme or activity and the UK's GDP as a proportion of EU GDP; and it would pay a "participation fee" of 4 per cent of the operational contribution.<sup>9</sup> Depending on how the Commission envisages calculating "the proportion of the internal market" in which the UK participates, the proposed

contributions to cohesion policy could go well beyond what was foreseen in the TCA.

The Commission's view is that the UK should not be put on a better footing than the EEA countries or Switzerland, which contribute to cohesion policy based on the extent of their participation in the single market. The UK view is that there must be "tangible benefits to the British public" in any agreements with the EU.<sup>10</sup> The British government has also made clear that while it is prepared to pay for its participation in specific programmes, it will not make a general contribution to the EU budget.<sup>11</sup>

The UK might be able to negotiate a scheme like that operated by the EEA and (additionally) by Norway, whereby the donor countries agree the scale of their contributions with the Commission, but then negotiate bilaterally with recipient EU member-states (primarily the countries that joined the EU from 2004 onwards) on which projects to fund. That would avoid paying into the EU budget directly. But even then, the government could expect to come in for criticism from the Conservatives and Reform UK. Even some who support closer ties with the EU think the Commission is asking for more than was envisaged in the Common Understanding: Lord Peter Ricketts, Chair of the House of Lords European Affairs Committee, has said that there is no case for the government to agree to what the EU is proposing.<sup>12</sup>

One of several time-sensitive elements in the Common Understanding was the agreement that UK and EU emissions trading systems (ETS) should be linked. The need to link the two systems was driven by the different timescales for implementation of the EU and UK Carbon Border Adjustment Mechanisms (CBAM). The CBAMs are designed to ensure that domestic manufacturers in certain carbon-intensive sectors such as steel or cement, which have to pay for their greenhouse gas emissions, do not face unfair competition from producers in countries without an ETS. The UK accepted in the Common Understanding that it would align dynamically with changes to the EU ETS, and that the independent arbitration panel for the agreement would ensure that the Court of Justice of the European Union was the ultimate authority on questions of EU law. The EU accepted that the Commission would consult the UK at an early stage in policy-making in areas in which the UK had agreed to align dynamically with EU rules, giving the UK a role in decision-shaping similar to that of the EEA countries.

8: 'Recommendation for a Council Decision authorising the opening of negotiations between the European Union and the United Kingdom of Great Britain and Northern Ireland on the participation of the United Kingdom in the internal electricity market of the Union and on the financial contribution of the United Kingdom towards reducing economic and social disparities between the regions of the Union', European Commission, December 22<sup>nd</sup> 2025.

9: 'Trade and Co-operation Agreement between the European Union and the European Atomic Energy Community, of the one part, and the United Kingdom of Great Britain and Northern Ireland, of the other part', Article 714, EUR-LEX website, consolidated version of January 4<sup>th</sup> 2025.

10: 'PM call with President of the European Commission Ursula von der Leyen: 12 November 2025', gov.uk website, November 12<sup>th</sup> 2025.

11: Nick Thomas-Symonds MP, oral evidence to the House of Lords European Affairs Committee, July 1<sup>st</sup> 2025.

12: Andy Bounds and Peter Foster, 'Dispute over money threatens EU-UK 'reset' talks', *Financial Times*, November 12<sup>th</sup> 2025.

As long as the UK and EU ETS are not linked, EU importers of iron and steel, aluminium, cement, fertilisers and hydrogen from the UK will have to pay for the 'embedded carbon' in the goods until the UK has its own CBAM. Full implementation of the EU CBAM began on January 1<sup>st</sup> 2026, while the UK's CBAM will only begin to operate on January 1<sup>st</sup> 2027, with full implementation only in 2029 at the earliest.<sup>13</sup> The EU has agreed to exempt electricity imports from the UK to the EU from CBAM, but that will still leave £7 billion of UK exports subject to EU charges. A 2024 estimate put the cost at between £200 million and £800 million for the 2026-30 period if the two ETS were not linked, depending on the difference in carbon prices in the two systems.<sup>14</sup>

The Commission started work on how to link the two ETS immediately after the EU-UK Summit, but the Council only authorised the start of negotiations with the UK in November 2025. As a result, the aim – set out in the December 17<sup>th</sup> joint statement by Cabinet Office minister Nick Thomas-Symonds and Maroš Šefčovič, the European Commissioner for trade and economic security – is to conclude the agreement on ETS linkage by the time of the next EU-UK summit. The summit's date has not yet been fixed, but should be around the middle of 2026 – leaving at least several months when some UK goods will be at a competitive disadvantage.

Co-operation between the UK's Competition and Markets Authority (CMA) on the one hand and the European Commission and member-states' competition authorities on the other was foreseen in the TCA. An agreement on co-operation would make it easier for all parties to work together to investigate mergers and other competition issues that affect the EU and the UK. The need for an agreement was highlighted in 2023 when the CMA and the Commission initially came to different conclusions about the acceptability of a merger between Microsoft and the video game company Activision. It took several months and minor changes to the terms of the merger to produce a deal that the UK and EU authorities could both accept.<sup>15</sup>

Negotiations on a competition co-operation agreement began in 2023 and were completed in October 2024. It took until November 4<sup>th</sup> 2025, however, for the Council to authorise signature. With the Council, the European Parliament and the UK yet to ratify the agreement, it may still take some time to enter into force.

★ **Internal security and judicial co-operation.** This section covers reinforced law enforcement and judicial co-operation in criminal matters; judicial co-operation in civil and commercial matters (on which it says little); and co-operation in relation to drugs risks and threats.

The TCA dealt with some aspects of law enforcement co-operation, but it fell well short of filling all the gaps left by Brexit. One could say that organised criminals were among the few groups in either the EU or the UK to benefit from Brexit: in becoming a third country, the UK made it harder for police and judicial authorities to co-operate with each other. The Common Understanding focusses on improving implementation of the law-enforcement and judicial co-operation provisions of the TCA, together with some updating to reflect changes in EU legislation or lessons learned from the four years of TCA implementation.

Despite the obvious value to both sides of more effective co-operation in combatting organised and other forms of crime, however, progress in this area has been slow. Anything touching on the rights of EU citizens is seen by the Commission as a sensitive area, requiring cautious technical work and sometimes legislation on the part of the EU, the UK or both.

There are steps the UK itself has yet to take that would simplify co-operation. The TCA provides, for example, that extradition depends on 'dual criminality' – that is, the state requesting extradition must prove that what the suspect allegedly did is legally regarded as a crime in the country where the suspect is located as well as the country where the act took place. That requirement can be waived, however, on a reciprocal basis for a specific list of serious offences. So far, 12 EU member-states have notified the Specialised Committee that they are willing to waive the requirement for dual criminality, but the UK has not – meaning that even for those 12 states, there has to be proof that an act is a crime in both jurisdictions before a suspect can be extradited. The UK government has said only that it is keeping its position under review.<sup>16</sup>

Another example of the UK not making full use of the opportunities offered by the TCA for law enforcement co-operation comes in Part Three, Title II of the agreement. This establishes a system for the EU and UK to exchange DNA, fingerprint and vehicle registration information, analogous to the Prüm Convention

13: 'Carbon Border Adjustment Mechanism (CBAM) Questions and Answers', European Commission (Taxation and Customs Union), updated December 17<sup>th</sup> 2024; 'Factsheet: Carbon border adjustment mechanism', gov.uk website, updated November 28<sup>th</sup> 2025.

14: 'Linking UK and EU carbon markets: Supporting efficient UK-EU trade and delivery of low-carbon goals', Frontier Economics, August 6<sup>th</sup> 2024.

15: Todd Davies and Marina Iskander, 'Co-ordination across the Channel: The EU and UK conclude technical negotiations on a competition co-operation agreement', Kluwer Competition Law Blog, November 25<sup>th</sup> 2024.

16: 'Priorities for the Scottish Criminal Justice System in the forthcoming review of the Trade and Co-operation Agreement between the United Kingdom and the European Union', letter from Dan Jarvis MP, Security Minister at the Home Office, to Audrey Nicoll, Convener of the Criminal Justice Committee of the Scottish Parliament, August 28<sup>th</sup> 2025.



operating within the EU. The UK is exchanging DNA and fingerprint information, but has not established a system to exchange registration data on vehicles (whether stolen or involved in crime).<sup>17</sup> In the Common Understanding, the two sides merely “acknowledge the requirement in the Trade and Co-operation Agreement to set up automated searching of vehicle registration data”, without indicating a process or a timetable for doing so, though the government has subsequently said (in its letter to the Scottish Parliament’s Criminal Justice Committee) that pre-connection evaluation procedures with the EU are underway.

There are also steps that the two sides could take together. The Common Understanding speaks of “quicker, better and deeper implementation” of the relevant TCA provisions, and especially intensifying the work of the TCA’s Specialised Committee on Law Enforcement and Judicial Co-operation to streamline co-operation on mutual legal assistance (the process by which the police or judicial authorities of one state can ask those of another to take testimony, obtain bank records, deliver a summons, freeze or confiscate assets and the like). The Specialised Committee only meets formally once a year, however; its first meeting after the EU-UK summit took place on December 4<sup>th</sup> 2025, and mutual legal assistance was not explicitly on the agenda.

With Brexit, the UK left the REITOX EU information network on drugs and drug addiction – a network to which not only EU member-states, candidate countries and EEA countries belong, but also third countries from Peru to Kyrgyzstan. The Common Understanding makes the reasonable point that an exchange of information would be mutually beneficial, and suggests that the EU Drugs Agency and its UK counterpart should make a working arrangement to this end. So far, however, no agreement has been reached.

★ **Irregular migration.** Perhaps because of its salience in UK domestic politics, irregular migration gets a section of its own in the Common Understanding, as well as appearing in the SDP, rather than being treated as one element of internal security and law enforcement. This section of the Common Understanding covers co-operation in tackling migration in source and transit countries; working on practical solutions to irregular migration and on returns; bolstering border security, including through enhanced law enforcement co-operation; and addressing abuses of visa policy (in other words, the use of legal routes to the UK and EU for potentially illicit purposes – such as entering the EU or UK on a student visa and then applying for asylum). The Common Understanding includes a commitment “to

deepen co-operation on challenges posed by irregular migration... while remaining committed to ensuring international protection for those who need it”.

The Commission recognises the UK’s political sensitivity to the issue of irregular migration, but its main priorities are different from the UK’s. They are first, to take responsibility for dealing with the UK over irregular migration, rather than leaving it to member-states to make bilateral deals with the UK (as France has already done); and second, to tackle irregular immigration, especially at the EU’s southern and eastern borders. Irregular emigration is not an explicit priority, though its relationship to organised crime may make it so.

The UK’s goal is to stop what it regards as illegal migration, and to prevent people gaining asylum in the UK if they have passed through another safe country first – which could increase the number of asylum seekers in EU member-states, if the UK can return them to those countries. The UK’s national asylum policy focusses on capping the numbers of refugees admitted to the country and taking steps to discourage arrivals, for example by making it harder for their families to join them.<sup>18</sup>

The EU and UK can at least agree on the need to tackle migration ‘upstream’ – as close to the source of migrants as possible. The Common Understanding speaks of sharing information and expertise, and of UK participation in various EU-led groupings. The UK attended the first two meetings of the EU’s Global Alliance to Counter Migrant Smuggling in November 2023 and December 2025. The Common Understanding also refers to the two sides “exploring United Kingdom participation in the Khartoum and Rabat Processes” – these being two groupings of EU and African countries (plus Switzerland and Norway), dealing respectively with migration to Europe from the Horn of Africa and from Western and Central Africa. When Theresa May was prime minister, the UK sought to remain part of the two processes, but the idea was later dropped in the negotiations on the TCA. Both sides now seem to have a renewed interest in UK involvement in the two processes – presumably with the UK contributing financially to projects designed to reduce irregular migration at source.

The sub-section on practical solutions and returns, with its commitment to “work together on practical and innovative approaches to reduce irregular migration” and in particular on preventing irregular Channel crossings, seems like the triumph of hope over experience. Climate change, conflict, and population growth in Africa, the Middle East and Asia act as push factors for all forms of migration; Europe’s relative prosperity acts as a pull factor.

17: Gemma Davies and Helen Carrapico, ‘Understanding the impact of Brexit on police and judicial co-operation: Can operational deficits be addressed in the future?’, in Gemma Davies and Helena Carrapico (editors), ‘UK-EU police and judicial co-operation post-Brexit’, Bloomsbury, 2025.

18: ‘Restoring order and control: A statement on the government’s asylum and returns policy’, gov.uk website, updated November 21<sup>st</sup> 2025.

As long as these push and pull factors exist, migration – regular or not – will continue. UK involvement in the European Migration Network – a network of experts from EU and other European countries, who provide statistics and other forms of research on migration and asylum – may help to ensure that policy-makers on both sides of the Channel have access to reliable data on the state of migration. But it will not reduce migration significantly.

UK co-operation with the European Border and Coastguard Agency (Frontex) may have somewhat more effect. It has been in place since the UK Border Force and Frontex signed a ‘working arrangement’ in February 2024. It covers areas such as capacity-building

in third countries, sharing best practice on returns of failed asylum seekers and other irregular migrants, and UK-EU co-operation in areas such as detecting forged documents. The arrangement also allows Frontex to deploy staff for operations in the UK, though without executive powers, and (with the permission of the state concerned) to permit UK personnel to be deployed, also without executive powers, for operations in an EU member-state. The existence of such operational co-operation with Frontex and with Europol’s European Migrant Smuggling Centre as an element in long-term EU-UK *rapprochement* is likely to outweigh its practical impact in cutting the numbers of migrants arriving in the UK, however.

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## Follow up to the Security and Defence Partnership

The Common Understanding for the most part builds on the TCA. The SDP, however, fills the gap in the TCA left by Boris Johnson’s decision to exclude foreign policy, defence and development issues from the agreement.<sup>19</sup>

Russia’s full-scale invasion of Ukraine in February 2022 led to increased informal co-operation, including then Foreign Secretary Liz Truss’s participation in an EU foreign ministers’ meeting in March 2022 – the first such EU-UK meeting since Brexit. There was still no institutional arrangement governing EU-UK co-operation on foreign, defence and development policy, however, and the next time a UK foreign secretary took part in an EU foreign ministers’ meeting was in October 2024, when the new foreign secretary, David Lammy, went to a Foreign Affairs Council meeting in Luxembourg.

In the margins of the meeting, Lammy agreed with then EU High Representative for Foreign Affairs and Security Policy and Vice-President of the Commission (HRVP) Josep Borrell that the foreign secretary and the HRVP should meet every six months; that there should be ‘strategic consultations’ at a lower level on Russia/Ukraine, the Indo-Pacific region, the Western Balkans, and hybrid threats; and that the two sides should work towards a security partnership.

Agreement on the SDP became more urgent in 2025, when the EU insisted that third countries could only take part in common procurement of defence equipment under the Security Action for Europe (SAFE) programme if they had an SDP. A number of other countries already had such agreements with the EU, and the UK did not want to be left out.

The SDP is not just an entry ticket to SAFE, however – a good thing, since negotiations on UK participation in the programme ultimately failed. It is a statement of common

interest in European security. As the second paragraph of the SDP says:

“The UK and the EU share a responsibility for the security of Europe. The security and prosperity of the UK and the EU are also closely interconnected and interdependent... The EU and the UK share the same challenging security environment and both have vital interests in the peace, security and stability of Europe and beyond.”<sup>20</sup>

After a preamble expanding on shared EU and UK interests and existing co-operation, the SDP consists of a ‘general framework’, setting out a schedule of meetings to guide the partnership, a list of 21 areas of co-operation, and a short ‘way forward’ providing for the areas of co-operation and the SDP itself to be reviewed from time to time:

★ **General framework.** First, this expands on the Lammy/Borrell agreement on six-monthly meetings: these will in future involve the HRVP and the UK foreign and defence secretaries, and will “conduct and enable strategic consultations” in the thematic and geographic areas identified by Lammy and Borrell. Then it provides for the HRVP to invite the UK to high-level meetings, including the Council, and for the UK to invite the HRVP to high-level meetings organised by the UK. Apart from the foreign and defence secretaries’ six-monthly meeting with the HRVP, junior ministers or the most senior officials from the Foreign, Commonwealth and Development Office and the Ministry of Defence will meet annually with the deputy secretary-general of the European External Action Service (EEAS) to monitor implementation of the SDP and provide further guidance, with working-level meetings preparing this dialogue and ensuring that any guidance it agrees is implemented. The SDP also recalls the provisions in the

19: Ian Bond, ‘Post-Brexit foreign, security and defence co-operation: We don’t want to talk about it’, CER policy brief, November 26<sup>th</sup> 2020.

20: ‘Security and defence partnership between the European Union and the United Kingdom of Great Britain and Northern Ireland’, gov.uk website, May 19<sup>th</sup> 2025.

TCA for dialogues on subjects such as counter-terrorism, countering the proliferation of weapons of mass destruction, and arms export control. Finally, it provides for the UK, like a number of other third countries, to take part in the EU's biannual Schuman Security and Defence Forum – a wide-ranging consultative meeting, though without any operational output.

★ **Exchanges on regional security issues.** The first of the 21 areas of co-operation. Building on the Lammy/Borrell agreement, in addition to Russia/Ukraine, the Western Balkans and the Indo-Pacific, the UK and EU will “explore opportunities to engage and collaborate further on other priority regions as appropriate”. Among the new areas covered are the wider Eastern European neighbourhood including the Black Sea, the Arctic, the Middle East, and Africa, in particular the Horn of Africa and the Sahel, as well as sanctions, and some discussions have already begun.

★ **Peace building and crisis management.** During the negotiations on the TCA, the EU put forward proposals that would have enabled the UK to take part in crisis management operations in the framework of the EU's Common Security and Defence Policy (CSDP).<sup>21</sup> The UK side was not interested at that time.

The SDP shows that the UK's approach is still very cautious. Rather than jumping straight to the UK signing a framework participation agreement (FPA) setting out the general terms for the UK to contribute personnel to CSDP missions and operations – something which 21 countries have already done – the UK and EU “will establish a dialogue on peace mediation, conflict prevention, stabilisation and resolution, and crisis management”. The UK “will consider its participation in the EU CSDP civilian and military crisis management... upon the invitation of the EU. The EU and the UK will explore the arrangements which could enable such participation”. The UK is willing to work alongside EU CSDP military operations, but not to have UK military personnel under EU command – perhaps because of the likely reaction from anti-EU opposition parties. Participation in civilian missions seems less sensitive.

More positively, the EU and UK will invite representatives of the other party to observe and/or participate in their crisis management exercises; the EEAS crisis response centre and the FCDO crisis management department will step up their co-operation; and there will be EU-UK consultations on consular issues, including consular crisis preparedness – presumably opening the way for the UK to benefit from collective European responses to crises affecting large numbers of European citizens in third countries. But for the moment the UK and EU will only “explore” co-operation in disaster response, including

21: ‘Foreign policy, security and defence part of the draft text of the agreement on the new partnership with the United Kingdom’, European Commission Task Force for relations with the United Kingdom, March 18<sup>th</sup> 2020.

UK involvement with the EU Civil Protection Mechanism (CPM) – a system for pooling resources (such as medical teams or firefighting aircraft) and expertise to respond to natural or manmade disasters. Apart from the member-states, the CPM already involves ten non-EU countries in Europe.

★ **Maritime security.** This is one of a cluster of issues, including health security, development co-operation and disaster response, dealt with by a negotiating table on wider security. On maritime security the SDP's tone is positive, speaking of “regular exchanges” and exploring “ways to deepen practical co-operation” on issues such as the “security and resilience of critical infrastructure”. The two parties agreed to enhance maritime security co-ordination, including in relation to operations such as those protecting shipping in the Red Sea, and to co-ordinate their responses to the environmental, safety and other risks posed by Russia's ‘shadow fleet’ of tankers carrying sanctioned oil. Discussions have reportedly been infrequent, however, and progress slow. The EU is seemingly reluctant to allow co-operation on maritime issues to touch on issues that the Commission regards as its purview, or where the Council would have to give the Commission a mandate to negotiate ‘non-binding instruments’ with the UK – agreements that both sides intend to honour, but which are not legally binding.

It is interesting to compare this section of the EU-UK SDP with the corresponding section of the June 2025 EU-Canada SDP, which goes into significantly more detail on co-operative activities. These include: “supporting the development of regional maritime security architectures in areas of mutual interest (e.g. Gulf of Guinea, Indo-Pacific) and of the capacities of coastal states to better address threats to maritime security and the sustainable development and exploitation of the maritime domain”; and “naval co-operation, also with the Canadian Coast Guard, including through joint exercises and port calls”.<sup>22</sup>

★ **Security and defence initiatives, policies and instruments.** This section, which speaks of “regular exchanges on the development of respective security and defence initiatives, including on defence readiness and defence industry”, does not refer explicitly to SAFE, though it clearly relates to it.

The SAFE regulation entered into force days after the EU-UK summit. Even before the summit it was clear that the British government was playing up the importance to UK industry of participation in the programme, and raising expectations that the SDP would lead to UK involvement. In the press conference after the EU-UK summit, Starmer referred to SAFE as “providing new opportunities for our defence industry, supporting British jobs and livelihoods”. The government's ‘explainer’ for the summit spoke

22: ‘Security and Defence Partnership between the European Union and Canada’, Council of the European Union, June 18<sup>th</sup> 2025.

of the UK and EU setting out “an ambition to explore possibilities for mutually beneficial co-operation created by the EU’s €150bn Security Action for Europe (SAFE) instrument which, once adopted, could lead to a more resilient and competitive UK and EU industrial base”.<sup>23</sup> A government press release claimed that the SDP would “pave the way for the UK defence industry to participate in the EU’s proposed new £150 billion Security Action for Europe (SAFE) defence fund – supporting thousands of British jobs and boosting growth”.<sup>24</sup> At this stage, the Commission also seems to have left the UK with the impression that it could be fully involved in SAFE – something which the text of the regulation made clear was not on offer.

The House of Commons Defence Committee said in a November 2025 report: “It is vital that British defence industry is not sidelined or excluded from working with their European counterparts – that will be the key measure (in relation to defence) of success when assessing the government’s relationship with the EU.”<sup>25</sup> Nick Thomas-Symonds, the UK minister for relations with the EU, told the EU-UK Parliamentary Partnership Assembly meeting on November 17<sup>th</sup>: “I cannot overstate the importance of the UK being a part of member-state procurements plans for the first round of loans”.

Days later, however, negotiations over UK participation in SAFE broke down, showing the limits of the EU-UK *rapprochement*. The fundamental problems were that the EU itself was pursuing a number of different objectives that were in tension with each other; and that the timescale for agreement, tied to the November 29<sup>th</sup> deadline for EU member-states to submit proposals for spending the loans they would receive from the programme, left no room to look for creative solutions when negotiations with the UK reached a dead end.

The EU knew that UK participation in SAFE would be seen as an important part of the ‘reset’ and of the follow up to the May 2025 summit – and it wanted the *rapprochement* with the UK to be a political success, at a time when Europe, not just the EU, felt its security at risk from Russian aggression and US indifference. The UK, with its large defence sector and history of collaborative projects with a variety of member-states, could make an important contribution to Europe’s rearmament and to European support for Ukraine.

On the other hand, the SAFE programme also presented a unique opportunity to develop the EU’s defence industrial

base and to reduce dependencies on non-EU countries – primarily the US, but also the UK. The bigger the share of work on defence projects that the UK took, the smaller the share available for EU firms.

Different member-states weighted these objectives differently, but ultimately the desire for an autonomous EU defence industrial base, promoted in particular by France, led the EU to adopt a negotiating position that was always going to be difficult for the UK to accept. The Commission put forward the concept that the ‘entry fee’ for the UK and Canada should be based on their estimated gains from taking part.<sup>26</sup> What this translated into, however, was a demand that the UK should pay €6.7 billion up front.<sup>27</sup> Canada, by contrast, was only required to pay €10 million up front, with further payments dependent on the actual gains for Canadian firms.<sup>28</sup>

The UK regarded the €6.7 billion figure as absurd: it would have amounted to almost 10 per cent of the UK’s 2025–2026 defence budget. With only a few weeks available for negotiations after the Council’s September 18<sup>th</sup> decision authorising the Commission to open talks, it proved impossible to bridge the gap, even though when talks ended the UK had increased its initial offer of €75 million to between €200 million and €300 million.<sup>29</sup>

Both sides have stressed that, even without an agreement, UK firms will be able to take part in SAFE-funded projects. Unlike Canadian firms, however, they will be subject to the restriction that a minimum of 65 per cent by value of the components in anything produced must come from EU sources, leaving a maximum of 35 per cent for third-country suppliers to compete for. Initially the government ruled out re-opening talks, arguing that it had plenty of bilateral collaboration opportunities. Starmer has subsequently said that he would look again “if it was in the national interest”.<sup>30</sup> There is also a possibility that the EU could decide to offer third countries, including the UK, easier terms for participation in the procurement of weapons and munitions for Ukraine, funded by the €90 billion EU bond agreed at the December 2025 European Council meeting.

Apart from SAFE, this section of the SDP also covers UK participation in the Permanent Structured Co-operation (PESCO) project on military mobility. The principle of UK participation was agreed by the EU in 2022, but detailed negotiations stalled over Spanish insistence that there should first be an EU-UK agreement on border control arrangements between Spain and Gibraltar. In June

23: ‘UK EU summit package explainer’, gov.uk website, May 19<sup>th</sup> 2025.

24: ‘PM secures new agreement with EU to benefit British people’, gov.uk website, May 19<sup>th</sup> 2025.

25: ‘The UK contribution to European security: Sixth report of session 2024–26’, House of Commons Defence Committee, November 19<sup>th</sup> 2025.

26: Gregorio Sorigi, ‘EU sets conditions for UK payments into SAFE defence fund’, *Politico*, August 22<sup>nd</sup> 2025.

27: Andy Bounds, George Parker and David Sheppard, ‘UK offers 1 per cent of Brussels’ €6.7bn demand to join EU defence fund’, *Financial Times*, November 19<sup>th</sup> 2025.

28: Dylan Robertson, ‘Europe says Canada must pay 10 million euros to join EU defence pact’, *The Canadian Press*, December 3<sup>rd</sup> 2025.

29: Esther Webber and Jacopo Barigazzi, ‘UK and EU hit impasse in defense deal talks’, *Politico*, November 20<sup>th</sup> 2025.

30: UK Foreign Secretary Yvette Cooper in oral evidence to the House of Commons Foreign Affairs Committee, December 16<sup>th</sup> 2025 and George Parker, Leila Abboud, Peter Foster and Sam Fleming, ‘UK to reconsider joining EU defence fund’, *Financial Times*, February 1<sup>st</sup> 2026.



2025 the UK, the EU and the government of Gibraltar announced “a conclusive political agreement on the core aspects” of the future EU-UK treaty, which should clear the way for the UK to take part in the military mobility project and perhaps in other PESCO projects.

Finally, this section of the SDP states that “possibilities for establishing an Administrative Arrangement between the UK and the European Defence Agency (EDA) will also be explored”. It is not clear why this is proving so difficult: the EDA already has administrative arrangements with five countries, including the US, and two international organisations, one of which – the Organisation for Joint Armament Co-operation (OCCAR) – the UK itself belongs to. On October 31<sup>st</sup>, however, the government could only say that “officials remain in discussions with the EU to identify practical ways to advance co-operation in these areas”.<sup>31</sup>

★ **Space security.** This is another area in which the two sides seem to be proceeding very cautiously. The only commitments are to “establish regular exchanges on space security to discuss inter alia threats and respective policy frameworks with a view to strengthening co-operation in areas of shared interest”, to develop co-operation on space-related security issues in various multilateral forums and to work together “to promote norms, rules and principles of responsible behaviour in outer space”.

Brexit led to the UK’s exclusion from various EU space programmes, including the Galileo satellite navigation system and the European Geostationary Navigation Overlay Service (EGNOS), a system that increases the accuracy of information from Galileo and other satellite navigation systems, such as the US-operated GPS. EGNOS is particularly useful for aircraft using smaller airports that are not equipped with systems to facilitate landings in poor visibility conditions. The UK also became an observer rather than a full participant in the Copernicus earth-observation satellite programme, so that (among other things) it only received low-resolution imagery, suitable for climate monitoring but not for defence and security purposes.<sup>32</sup>

The UK rejoined the Copernicus programme in January 2024, but it remains outside Galileo and EGNOS – even though it hosts two ground stations supporting EGNOS. One effect of this situation is to increase the UK’s dependence on the US for accurate and encrypted satellite navigation data for military operations, since it no

longer has access to the EU’s secure system. The previous government, having floated the idea of a UK-only satellite navigation system, eventually dropped the idea on cost grounds.<sup>33</sup> It nonetheless continued to explore the possibility of a UK-only replacement for EGNOS – a policy that the current government has maintained, although it would probably cost many times as much as negotiating association with the EU system.<sup>34</sup>

The EU and UK are also developing separate secure satellite communications programmes – IRIS<sup>2</sup> and Skynet6 respectively. There are good reasons for both parties to consider integrating their programmes in some way. The European Commissioner for Defence and Space, Andrius Kubilius, indicated in July that he would not be opposed to the UK (as well as Norway and Ukraine) joining IRIS<sup>2</sup>.<sup>35</sup>

The UK government already has a stake in Eutelsat, a French company that is one of the partners in the consortium of satellite operators chosen by the Commission to build and operate IRIS<sup>2</sup>. The UK’s 11 per cent share in Eutelsat results from the 2022 merger of Eutelsat with OneWeb, the operator of a low-earth orbit (LEO) constellation of communication satellites in which the UK government invested £400 million in 2020. OneWeb plans to extend its LEO constellation by using spare capacity in the IRIS<sup>2</sup> constellation.<sup>36</sup> Moreover, Eutelsat announced at the end of 2024 that it would add another 100 satellites to the OneWeb constellation, and that these would be compatible with IRIS<sup>2</sup>.<sup>37</sup> These satellites will be manufactured by Airbus, which is also one of two firms bidding to manufacture the satellites for IRIS<sup>2</sup>. Linking the two constellations would give the EU and UK access to a more resilient system and should be a more cost-effective solution for both parties.

★ **Emerging disruptive technologies.** It is unclear what progress, if any, has been made on this section, which refers to discussions “on security and resilience of emerging disruptive technologies, including the development of international governance efforts on the responsible use of Artificial Intelligence (AI) in security and defence” – an important topic, but one where EU and UK attitudes differ significantly. The EU is more cautious about the possible uses of AI; the UK is more positive.

★ **Cyber issues.** Although the SDP speaks of the EU and UK “further develop[ing] their co-operation on cyber issues”, there has been no change to the rhythm of annual meetings of the cyber dialogue established by the TCA (the most recent taking place in Brussels in

31: House of Commons Written Questions, ‘EU Defence Policy: Question for Ministry of Defence’, tabled by Helen Maguire on October 23<sup>rd</sup> 2025 and answered by Al Carns on October 31<sup>st</sup> 2025.

32: Marissa Martin, ‘Re-joining Copernicus: A look at UK-EU space relations’, UK in a Changing Europe, October 3<sup>rd</sup> 2023.

33: Cristina Gallardo, ‘UK scraps Brexit alternative to EU’s Galileo satellite system’, *Politico*, September 24<sup>th</sup> 2020.

34: ‘European Geostationary Navigation Overlay Service’, House of Lords debate, June 12<sup>th</sup> 2025.

35: Théophane Hartmann, ‘UK, Norway and Ukraine welcome to join EU’s IRIS<sup>2</sup> space programme, says commissioner’, Euractiv, July 28<sup>th</sup> 2025.

36: Joanna Darlington, Eutelsat, in oral evidence to the House of Lords UK Engagement with Space Committee, March 31<sup>st</sup> 2025.

37: Nick Wood, ‘Eutelsat to launch another 100 OneWeb satellites’, *telecoms.com*, December 18<sup>th</sup> 2024.

December 2025). The meetings seem to be confined to exchanges of information, rather than anything more operational – though the participation of Europol suggests that on the EU side at least it might be possible to take co-operation further.

★ **Countering hybrid threats and resilience of critical infrastructure.** This section of the SDP is more interesting than many, in that it commits the parties to something more than a dialogue. They will “co-operate on research on and analyses of hybrid threats, including by supporting close co-operation between academic institutions and think-tanks, as well as through the European Centre of Excellence for Countering Hybrid Threats”. The UK (like all EU and most NATO countries) is already a member of the Centre of Excellence for Countering Hybrid Threats, based in Helsinki. So far, however, neither the EU nor the UK seems to have published any tenders for academic or think-tank research, despite the increase in hybrid attacks on European countries.

The first round of strategic consultations on hybrid threats has taken place: the UK’s Minister for Europe, Stephen Doughty, met Charles Fries, the EEAS Deputy Secretary-General for Peace, Security and Defence, in September. Apart from an announcement that the meeting took place, neither side said anything publicly about it, but there has reportedly been substantive follow-up.

The SDP also refers to the EU and the UK seeking to co-operate “to enhance the resilience of critical infrastructure in Europe, including underwater infrastructure”. This is a particularly vital issue for an island nation, but hybrid attacks on sub-sea infrastructure in the Baltic Sea have shown that it is also important for EU member-states.

Improving the resilience of critical national infrastructure (CNI) is a complex issue, involving governments, security and law-enforcement bodies, military forces and the private sector. The EU’s approach, set out in the Critical Entities Resilience Directive of 2022 and subsequent guidance, focuses on ensuring that governments have strategies to enhance the resilience of critical entities (a wider category than infrastructure), and that critical entities assess the risks they face, take steps to mitigate them and report on incidents involving them. It recognises the importance of co-operation with third countries, particularly those near the EU.

The UK’s approach, set out in its July 2025 Resilience Action Plan, is more narrowly national, only

acknowledging the advantages of drawing on the examples of how other nations in Europe deal with issues of resilience.<sup>38</sup> The UK sees the protection of CNI as a military task, including in a NATO context. The UK’s Strategic Defence Review, published in June, spoke of the protection and defence of CNI being “rooted in partnership with private-sector and allied operators”.<sup>39</sup> It recommended that the Royal Navy should take the lead in co-ordinating efforts to secure sub-sea infrastructure and maritime traffic. The UK seems to see some role for the EU in establishing rules for entities within the EU, but perhaps not much more than that. Interestingly, a report by the British-Irish Parliamentary Assembly on post-Brexit EU-UK defence and security co-operation welcomed the inclusion of critical infrastructure in the SDP, describing it as “an area where evidence of effective co-operation is currently lacking”.<sup>40</sup>

★ **Countering foreign information manipulation and interference (FIMI).** Both the EU and the UK have been the targets of FIMI – efforts to undermine democratic systems through online and other campaigns spreading disinformation or narratives which are hostile to European values. The EU defines its foundational values in the Treaty on European Union as “respect for human dignity, freedom, democracy, equality, the rule of law and respect for human rights, including the rights of persons belonging to minorities”, and – despite leaving the EU – the UK subscribes to similar values. Like that on hybrid threats, this section of the SDP foresees practical co-operation rather than merely dialogue: the parties agreed to “co-ordinate approaches and systems to detect, analyse and respond to FIMI in order to raise the costs for malign actors and to strengthen resilience of their respective societies” and to strengthen co-operation in detecting and responding to FIMI.

Since the May summit, the British government has highlighted its co-operation with the EU in this area. In answer to a parliamentary question in September, Doughty wrote: “Alongside our EU counterparts, we are committed to expanding our counter FIMI capabilities and ensuring we have the resources, systems, and partnerships in place to address this threat. We ... will look to act jointly wherever possible with our likeminded partners, including the EU and European partners”, and noted that he had had regular discussions on the topic with the EEAS.<sup>41</sup> The EU Delegation to the UK has hosted five annual FIMI forums in London, with wide participation from UK civil society groups, though British government participation has generally been at working level rather than anything more senior.

38: ‘The UK government resilience action plan: The UK’s strategic approach to resilience’, gov.uk website, July 2025.

39: ‘Strategic Defence Review – Making Britain Safer: Secure at home, strong abroad’, gov.uk website, June 2025.

40: ‘UK-EU defence and security co-operation post-Brexit: Final report’, Committee B (European Affairs) of the British-Irish Parliamentary Assembly, October 2025.

41: House of Commons written questions, ‘UK relations with EU: Disinformation and subversion: Question for Foreign, Commonwealth and Development Office’, tabled by Anneliese Dodds on August 29<sup>th</sup> 2025 and answered by Stephen Doughty on September 9<sup>th</sup>.

In a December 2025 statement announcing sanctions against a number of individuals and entities associated with Russian FIMI campaigns, the government said that it was “stepping up co-operation with European partners on hybrid and information threats, including ... through deep co-operation between teams in the UK, in France, Germany, Poland and Brussels, to deliver a pan-European response to a pan-European threat”.<sup>42</sup> Ironically, however, the sanctions themselves were not fully aligned with those of the EU. In some cases, the UK was catching up, sanctioning individuals who had already been under EU sanctions for some time. On the other hand, it also sanctioned two Russian-controlled media outlets based in Belgium and responsible for distributing disinformation to European audiences, even though the EU has not so far acted against them – possibly a reflection of the different legal frameworks for EU and UK sanctions.

★ **Counter-terrorism, preventing/countering violent extremism.** The TCA established an annual dialogue on counter-terrorism, the most recent round being in February 2025. The SDP speaks of “developing” co-operation in this area, but without proposing any specific steps.

★ **Non-proliferation, disarmament and conventional arms, including small arms and light weapons (SALW).** The TCA also established dialogues on the non-proliferation of weapons of mass destruction and on small arms and light weapons and the trade in conventional weapons. The SDP’s provisions do not appear to go beyond what was agreed in the TCA.

★ **Capacity building for partners in security and defence.** The SDP does not make a specific reference to Ukraine in this section, but there has been significant EU-UK co-operation on capacity building for the Ukrainian armed forces since the start of Russia’s full-scale invasion in 2022. The UK was quicker than the EU to launch training for Ukrainian troops, and several EU member-states soon sent their own trainers to the UK to help to deliver the UK training programme. When the EU set up its own training programme, the EU Military Assistance Mission Ukraine, in November 2022, EEAS staff had already visited UK training facilities.<sup>43</sup> The EU’s course curriculums were based on those used by the UK.<sup>44</sup> There is clearly scope for further co-operation as the kind of training provided for Ukrainian forces evolves and increasingly takes place in EU member-states. It remains to be seen, however, whether the UK will respond to the hint in the SDP that it could make a voluntary contribution to the EU’s European Peace Facility to fund future training.

★ **Training, education in security and defence.** This section of the SDP focusses particularly on increasing co-operation between the European Security and Defence College (ESDC) – a network of national training establishments in EU member-states – and its counterparts in the UK.

Four UK institutions are already Associate Network Partners of the ESDC: three universities or university institutes and the UK Defence Academy (the umbrella organisation for joint services training, including the Joint Services Command and Staff College and the Royal College of Defence Studies). In the SDP, both parties say that they will seek to make it easier for the other to take part in their security and defence training activities – though the EU-UK SDP does not go as far as the EU-Norway SDP, signed in May 2024, or the EU-Canada SDP, both of which say that those countries are “welcome to send participants to ESDC activities”. The Council Decision setting out the terms of reference for the ESDC also provides for its activities to be made “open to participation ... , as appropriate, by nationals of other third states” – suggesting that it should be simple to implement this part of the SDP.

★ **Situational awareness.** This short section of the SDP foresees exchanges of information on “situational awareness and threat assessments in areas of common interest, including classified information”. An agreement on security of information, enabling such exchanges, entered into force in parallel with the TCA. That agreement provided for the UK to send all information via the General Secretariats of the Council and Commission or the registry of the EEAS, depending on the intended recipient, and for the EU to send all information via the UK Mission to the EU. The SDP’s pledge to “explore additional measures to ensure that classified information can be exchanged swiftly, safely and effectively” is an effort to shift from laboriously transferring classified information on paper to transmitting it electronically. The stumbling block may be the need to agree on an encrypted communications system that satisfies the security requirements of both parties.

★ **Co-operation in third countries and multilateral fora and institutional exchanges.** Most of this section of the SDP is concerned with routine co-operation between EU and UK diplomatic missions in third countries and international organisations in pursuit of shared aims in areas such as the promotion of human rights, democracy and the rule of law. In practice, this sort of activity has continued regardless of Brexit – the EU and other like-minded states including the UK

42: ‘New UK action against foreign information warfare’, gov.uk website, December 9<sup>th</sup> 2025.

43: Iulian Romanynshyn and Julian Bergmann, ‘Preference convergence, functional pressure and supranational entrepreneurship: Explaining the launch and design of the EU’s military assistance mission to Ukraine’, European Security, May 26<sup>th</sup> 2025.

44: Luigi Scazzieri, ‘How the UK and the EU can deepen defence co-operation’, CER policy brief, March 7<sup>th</sup> 2025.

have often taken action in parallel on subjects that they agree about. The more important point in this section is the agreement that the two parties “will explore the possibility of seconding staff from and to their respective institutions”. The EU has agreements on secondments with ten countries or international organisations, including the US, Argentina and the League of Arab States; there seems no good reason why the UK has not already negotiated such an arrangement.

★ **External aspects of economic security.** Even though aspects of economic security were among the topics identified in July 2024 by then foreign secretary David Lammy for inclusion in a security and defence agreement with the EU, this is an under-developed section of the SDP.<sup>45</sup> A recent analysis described it as “a missing element of EU-UK co-operation”.<sup>46</sup> The authors note that the EU’s engagement with the UK on economic security is less substantive than that with most other like-minded countries, such as Canada, Japan, Norway or South Korea. Only the US (since Donald Trump took office and the EU-US Trade and Technology Council fell into abeyance) has such thin contacts with the EU on issues like critical minerals, digital and tech governance, or export controls and investment screening. Canada, by contrast, has a dedicated Economic Security Dialogue with the EU covering these and other issues. Increased EU-UK engagement may be possible as the Commission implements its December 2025 communication on economic security, one element of which is stepped-up co-operation with trusted partners.<sup>47</sup>

★ **External aspects of the fight against corruption and illicit finance.** This section of the SDP is also insubstantial – referring only to “co-operation to tackle illicit finance and corruption in third countries”.

A whole title of the TCA is devoted to co-operation in fighting money-laundering and terrorist financing, and this touches on preventing the use of financial systems to launder the proceeds of crime, including corruption. A further title deals with co-operation in freezing and confiscating the proceeds of crime, so perhaps the EU and UK think there is nothing further they need to do.

The UK’s recently published anti-corruption strategy makes no mention of co-operation with the EU – even though it refers to corruption issues affecting some member-states or candidate countries.<sup>48</sup> As the UK will host an ‘Illicit Finance Summit’ in London in June 2026, it should reflect on whether there is more it could achieve through closer co-operation with EU bodies like Europol. Europol is involved in countering money-laundering

and helping EU member-states track and confiscate the proceeds of crime, and hosts the ‘Camden Asset Recovery Inter-agency Network’, of which the UK remains a member.

There may also be scope for the EU to engage with UK-led international anti-corruption efforts. Only two law enforcement bodies from EU member-states (the National Directorate of Judicial Police of the French National Police and the Netherlands Fiscal Information and Investigation Service) are full members of the International Anti-Corruption Co-ordination Centre (IACCC) hosted by the UK National Crime Agency. Interpol is an ‘operational partner’ of the IACCC, but Europol is not.

★ **Women, Peace and Security.** This section of the SDP largely mirrors that in the EU-Norway SDP, but is considerably less detailed than the corresponding section of the EU-Canada SDP – reflecting the priority that Canada attaches to the issue. There is certainly scope for the EU and UK to do more together on an issue which both regard as important. But in the UK’s 2024-25 annual report to Parliament on implementation of its ‘Women, Peace and Security National Action Plan’, co-operation with the EU was only mentioned once, in the context of work by the EU, UK and US to support Ukrainian investigations and prosecutions of atrocities committed during Russia’s war of aggression. One potential area of co-operation is in joint training on women, peace and security issues for those involved in crisis management operations and missions.

★ **External dimension of irregular migration.** This section adds nothing practical to the co-operation set out in the Common Understanding.

★ **Climate – security nexus.** This is another section of the SDP which is less detailed than its counterpart in the EU-Canada SDP, though in practical terms both documents only commit the parties to exploring exchanges on climate and security issues. The EU-UK SDP speaks vaguely of discussions on policy approaches and promoting joint action; the EU-Canada document suggests “addressing the security implications of climate-related impact on infrastructure, equipment, training and readiness, operations, policy, and planning...[and] ways to enhance the resilience of vulnerable regions, and shar[ing] knowledge and best practices on integrating climate considerations into their defence, security, and civil protection strategies, without compromising operational capabilities and effectiveness”. This is a concrete and important agenda for the UK and EU member-states also.

45: Patrick Wintour, ‘Labour to seek joint declaration with EU on wide-ranging security pact’, *The Guardian*, July 7<sup>th</sup> 2024.

46: Anton Spisak and Jake Benford, ‘Is economic security a missing element of EU-UK co-operation?’, UK in a Changing Europe blog, December 17<sup>th</sup> 2025.

47: ‘Joint communication to the European Parliament and the Council: Strengthening EU economic security’, December 3<sup>rd</sup> 2025.

48: ‘UK anti-corruption strategy 2025: Supporting growth, strengthening security, protecting democracy’, gov.uk website, December 2025.



★ **Global health security.** The SDP has little to say on this: the parties “will enhance co-operation and information exchange on global health security issues and on preparedness and response to global public-health security emergencies”. Even before the change of government in the UK, the UK Health Security Agency (UKHSA) signed a memorandum of understanding on co-operation with the European Centre for Disease Prevention and Control (ECDC). This covered areas such as rapid sharing of epidemic intelligence and combatting anti-microbial resistance. In the spring of 2024 the UK’s Department of Health and Social Care joined the EU-led Critical Medicines Alliance, which identifies vulnerabilities in supply chains and recommends ways to address them, including by diversifying the sources of critical medicines and boosting manufacturing.

The UK has some ideas on how to give health security co-operation more content, starting with a structured dialogue with the Commission. It is interested in issues such as pandemic preparedness, medical supply chain resilience and sharing information on new synthetic illicit drugs. It also sees a need for the UK and the EU to fill gaps left by cuts in US funding for global health programmes.

The Commission is so far unenthusiastic about another bilateral dialogue with the UK. In any case, a lot of co-operation on the issue goes on under the auspices of the World Health Organisation.

Some UK organisations have suggested going significantly further than the kind of co-operation envisaged by the SDP, and signing a ‘health protection treaty’ or ‘health security treaty’, covering issues such as harmonisation of standards for medicines and medical devices; rules to permit the results of clinical trials carried out in the UK to be accepted by the EU (the UK already allows the results of trials carried out in the EU to be accepted in the UK); and steps to ensure an adequate supply of medical professionals.<sup>49</sup> Some if not all of these topics are regarded by the EU as single market issues, and would require the Commission to obtain a mandate to negotiate an agreement with the UK. As part of any deal, the UK would have to accept dynamic alignment with EU rules; and – despite the fact that both sides would benefit from renewed integration – the EU might well seek to extract a price for the UK rejoining another element of the single market.

49: Jonathan Devereux, ‘Collaborating on the future health of Europe: Building an EU-UK Health Protection Agreement’, NHS Confederation, May 13<sup>th</sup> 2025; Mark Dayan, Tamara Hervey and Cyril Lobont, ‘How could Britain and the EU work together to improve health?’, Nuffield Trust, December 18<sup>th</sup> 2024.