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# EU-UK relations

## Will 2026 be the year to reset the reset?

By Ian Bond

# EU-UK relations: Will 2026 be the year to reset the reset?

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- ★ The Labour government came into office in July 2024 promising to reset the UK's relationship with the EU. The May 2025 EU-UK summit seemed to presage a new era in relations. But does the reset go far enough?
- ★ The Labour government's red lines (no return to the customs union; no return to the single market; no return to freedom of movement) limit what the reset can achieve. There has been progress on some of the UK's initial objectives for the reset, but not all.
- ★ The EU-UK summit in May 2025 produced a 'Common Understanding' listing 20 areas of co-operation, and many more subsidiary topics. Some topics – such as co-operation on international development assistance, or health security – that ought to be easy wins have turned out not to be. There have been some successes: the UK is rejoining the Erasmus+ programme for educational and training exchanges, at least for a year.
- ★ In other areas, discussions are bogged down: the UK was slow even to agree to the principle of a 'youth experience scheme', to allow young Britons to live and work in EU countries and young EU citizens to live and work in the UK for a period. Both sides agree that UK integration into the European electricity market would be mutually beneficial. But the EU wants the UK to contribute to 'cohesion policy' (by providing funding to help poorer regions of the EU catch up economically with richer ones) as the price of partial integration into the single market, in this and other areas, and the UK is resisting.
- ★ The Security and Defence Partnership (SDP) was supposed to clear the way for the UK to negotiate a separate agreement with the EU, giving UK firms the ability to play a major part in defence procurement projects under the EU's Security Action for Europe (SAFE) programme. In a significant setback to the reset, however, negotiations broke down – largely because the EU demanded an up-front payment amounting to around 10 per cent of the UK's annual defence budget. This outcome may benefit some individual EU-based defence firms, but it will weaken European defence as a whole. Some in the EU seem to be having second thoughts about excluding the UK from the programme.
- ★ Overall, though there has been some progress in implementing what was agreed at the May summit, momentum has been lost. Both sides bear some responsibility. Both are transactional in their approach to the relationship, and miss the bigger picture. Both, in their different ways, have been scarred by the experience of Brexit, limiting their willingness to be more creative in strengthening their partnership.

- ★ The review of the implementation of the Trade and Co-operation Agreement (TCA) must take place this year, and there should be another EU-UK summit. Five things are likely to influence the further development of the relationship in 2026:
  - ★ The behaviour of Donald Trump. His support for far-right parties in Europe and his threats to Greenland are making the case for Europe, including the UK, to become less dependent on the US for defence. It may even increase the pressure on the UK government to seek a wider *rapprochement* with the EU.
  - ★ The evolution of Russia's assault on Ukraine. If Ukraine's situation deteriorates further, European leaders will have to grapple with a possible need to deploy their own forces in or over Ukraine to support it. The EU and the UK will need to work together to tighten sanctions on Russia.
  - ★ The state of the EU and UK economies. None of the UK's other trade deals can promote as much economic growth as closer integration with the EU's internal market; but the UK is also one of the EU's most important trading partners – the Union too would benefit from lower barriers, albeit less.
  - ★ UK domestic politics. Faced with the rise of Reform UK, the government can either double down on emphasising national sovereignty and refusing to restore some of the links broken by Brexit; or it can prioritise more integration with the EU as a way to generate growth. So far, there are signals pointing in both directions.
  - ★ The attitude towards the UK of the leaders of the EU and the member-states, including those like Germany that have good relations with London. If they can put the bad feelings and distrust of the Brexit negotiation period behind them, there will be more chance of progress in the areas identified at the EU-UK summit meeting in 2025. If they cannot, or if they give no clear instructions to their representatives in Brussels to change course, the relationship is likely to remain limited and sometimes tense. The UK's problem is that member-states may not want to offer the UK a better deal if they think a Reform UK government will tear it up in a few years; but the economic effect of the absence of such a deal may make a Reform victory more likely.
- ★ The world of 2026 is very different from the world of 2016, when the UK voted for Brexit. Neither the UK nor the EU seems to appreciate the scale of the changes. The UK-US special relationship has been severely damaged, and the rules-based international order has in many respects disintegrated. The EU and UK need a fundamental rethink of how they can enhance their security and prosperity by working together for European strategic autonomy.

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The UK Labour Party's manifesto, published in June 2024, promised to "reset the relationship" between the UK and the EU following Brexit and to "seek to deepen ties with our European friends, neighbours and allies".<sup>1</sup>

Since the Labour government came into office in July 2024, there have been new bilateral treaties with France and Germany; and at the EU-UK summit held in London in May 2025, the parties issued three documents on their future relationship:

- ★ a joint statement setting out a new strategic partnership between them – largely a recitation of international issues on which the two sides already agree;
- ★ a more operational 'Common Understanding', pointing to possible future co-operation in a wide range of areas;

- ★ a Security and Defence Partnership (SDP), which, among other things, was designed to open the way to UK participation in EU defence industrial projects.<sup>2</sup>

The summit seemed to presage a new era in post-Brexit relations. The question is whether the reset and the EU's response to it go far enough – bounded as they are by the Labour manifesto's red lines of no return to the single market, the customs union or freedom of movement, and the EU's mantra of 'no cherry-picking'.

1: 'Change. Labour Party manifesto 2024', June 13<sup>th</sup> 2024.

2: 'UK/EU Summit - Key documentation', gov.uk website, May 19<sup>th</sup> 2025.

The external threats to the EU and the UK have grown since the Trade and Co-operation Agreement (TCA) came into force in 2021. Russia is not only continuing its war of aggression against Ukraine; it is also mounting increasingly violent hybrid attacks against other European countries. China is using its economic muscle in ways that threaten the viability of many parts of European industry, in the EU and the UK.<sup>3</sup> And the US is becoming more protectionist, more erratic as an international actor, more hostile to mainstream European political parties and less willing to defend Europe. In his speech to the World Economic Forum in Davos in January 2026, Canadian Prime Minister Mark Carney described the global situation as “a rupture in the world order”<sup>4</sup>

## What has the reset achieved so far?

The reset was always destined to make more progress in some areas than others. The Labour government’s red lines ruled out a transformation in the trade and economic relationship with the EU. Still, the 2024 manifesto promised to tear down “unnecessary barriers to trade”, and made four specific pledges:

- ★ to “seek to negotiate a veterinary agreement to prevent unnecessary border checks and help tackle the cost of food”;
- ★ to help UK artists, for whom mounting a European tour had become a nightmare of customs documents and work permits;
- ★ to secure an agreement with the EU on mutual recognition of professional qualifications, to help open up markets for UK service exporters;
- ★ to “seek an ambitious new UK-EU security pact”.

**“The Labour government’s red lines ruled out a transformation in the trade and economic relationship with the EU.”**

The last of these goals could be said to have been achieved, with agreement on the SDP at the EU-UK summit – although in some areas implementation is already running into trouble (see below). The others are at various stages of negotiation, or none at all.

The ‘veterinary agreement’ – more accurately, a sanitary and phytosanitary (SPS) agreement to make trade in food

3: See for example Sander Tordoir, Nils Redeker and Lucas Guttenberg, ‘How buy-European rules can help save Europe’s car industry’, CER policy brief, October 2<sup>nd</sup> 2025.

4: ‘Davos 2026: Special address by Mark Carney, Prime Minister of Canada’, World Economic Forum, January 20<sup>th</sup> 2026.

5: ‘Our mission’, Cultural Exchange Coalition website.

The next EU-UK summit meeting and the scheduled 2026 review of TCA implementation offer the chance – if both sides want it – to establish a much closer partnership, in the interest of enhancing their security and prosperity; but they could also decide that there are fewer political risks in staying within current boundaries, even if that leaves them collectively weaker.

This policy brief examines what the UK-EU reset has achieved so far; looks at the prospects for 2026 – ten years after the UK voted to leave the EU; and sets out what more the EU and the UK could do to respond to the common challenges they face.

and agricultural products easier – required the EU to adopt a negotiating mandate, which it did in November 2025, enabling formal negotiations to start.

At the time of writing, musicians’ grievances about the barriers to touring in the EU have not been addressed. The Common Understanding recognised “the value of travel and cultural and artistic exchanges, including the activities of touring artists”, but the only commitment from the EU and UK was to “continue their efforts to support travel and cultural exchange”. The recently formed EU-UK umbrella group ‘Cultural Exchange Coalition’, which brings together more than 80 organisations representing artists, technical personnel and businesses involved in music, theatre and visual arts, says that post-Brexit arrangements are failing “audiences, artists and venues”, causing economic damage and weakening cultural connections between the EU and the UK.<sup>5</sup>

There has been no progress on mutual recognition of professional qualifications either, though the Common Understanding promises a dedicated EU-UK dialogue on some aspects of trade in services, which would cover this issue, among other things. Recognition of qualifications and “the regulatory environment for skills and professionals” were on the agenda for the meeting of the TCA’s Trade Specialised Committee on Services, Investment and Digital Trade in October 2025.<sup>6</sup> But only one proposal, on mutual recognition of architects’ qualifications, seems to have reached the stage of discussion between the EU and the UK, and the “dedicated dialogue” has not yet begun.<sup>7</sup>

The May summit agreements added many more areas of potential co-operation to the original four in the Labour manifesto. Follow-up discussions have been divided

6: ‘The fifth trade specialised committee on services, investment and digital trade under the UK-EU Trade and Co-operation Agreement (TCA), Thursday 23<sup>rd</sup> October 2025 – agenda’, European Commission, October 16<sup>th</sup> 2025.

7: ‘Trade and Co-operation Agreement implementation report, 2023-2024’, gov.uk website, September 2<sup>nd</sup> 2025.

among ten thematic ‘tables’. Some of these involve formal negotiations with a view to reaching legally binding agreements, and have already started work, such as those covering UK participation in the SAFE programme; youth mobility; and integration of the UK into the EU electricity market. Others are at a very early stage. In every case where the UK would like integration into or closer association with the EU’s internal market, there is a wide gap between what the EU wants the UK to pay in return for improved trading conditions, and what the UK regards as a reasonable contribution to EU administration costs.

There have been some concrete achievements since the May summit, and 2025 ended on a high note, with the announcement that the two sides had agreed that the UK would rejoin the Erasmus+ programme for educational and training exchanges from 2027, and that negotiations on UK participation in the EU’s internal electricity market would start shortly. Details of progress in implementing each point in the Common Understanding and the SDP are set out in the annex to this policy brief.

Overall, however, there has been a sense on both sides of lost momentum since May. Then, European Council President António Costa spoke of “a new chapter in the relationship between the UK and the EU – the start of a renewed and strengthened strategic partnership”.<sup>8</sup> European Commission President Ursula von der Leyen described the EU and UK as “historical and natural partners standing side by side on the global stage, facing the same challenges, pursuing the same objectives, like-minded, sharing the same values”<sup>9</sup>

**“Labour has been disappointingly willing to tolerate the continuing economic damage caused by being outside the EU.”**

Some of the reduced impetus was down to the British government’s continued reluctance for much of 2025 to confront eurosceptics in the media and the political opposition – even though the Office for Budget Responsibility estimates that Brexit will make the UK’s GDP 4 per cent smaller in the long term, and a recent study by the US National Bureau of Economic Research (NBER) put the figure even higher – showing that Brexit had already reduced GDP by 6-8 per cent.<sup>10</sup> For a government that came into office with “kickstart economic growth” as the first priority in its manifesto, Labour in 2025 was disappointingly willing to tolerate the continuing economic damage caused by being outside

8: ‘Remarks by President António Costa at the joint press conference following the EU-UK summit in London’, European Council/Council of the European Union, May 19<sup>th</sup> 2025.

9: ‘Statement by President von der Leyen at the joint press conference with President Costa and UK Prime Minister Starmer following the EU-UK Summit’, European Commission, May 19<sup>th</sup> 2025.

10: Nicholas Bloom and others, ‘The economic impact of Brexit’, National Bureau of Economic Research Working Paper, November 2025.

the EU, in the (vain) hope of avoiding accusations of betraying Brexit.

It was noticeable that at the post-summit press conference, Costa and von der Leyen stressed the benefits to both sides of increased co-operation, while Starmer focused exclusively on what the UK would get from what he described as a “new partnership between an independent Britain and our allies in Europe”, and stressed that the government would stick to the manifesto’s red lines.<sup>11</sup> When Thomas-Symonds spoke about the UK’s future relationship with the EU in August 2025, he continued to insist that “without rejoining the single market, or the customs union, and without reopening freedom of movement, we can still build a valuable relationship with the EU that genuinely benefits Britain”.<sup>12</sup> In reality, it will be a relationship that brings modest benefits, and is less valuable than it could be if the government were willing to be bolder.

But the EU also needs to take a share of the blame for failing to respond to the needs of the moment. The SDP states, correctly, that the UK and the EU share a responsibility for the security of Europe, and that “the UK is an essential partner for the EU in the area of peace, security and defence”. But in conversations with EU officials, there is still a hint that the UK should be made to pay a price for Brexit, or held up as an example of the negative consequences of voting to leave the Union. Member-states, and especially their permanent representations in Brussels, which sit on the EU working party for relations with the UK, are also inclined to insist that the UK should not be allowed to cherry-pick and participate in some parts of the internal market but not others – even as the EU debates partial integration of Ukraine and other candidate countries into the single market. The more favourable treatment the EU has sometimes given countries like Canada and South Korea is suggestive of a desire to keep punishing the UK for the 2016 referendum.

The handling of negotiations over SAFE epitomises the EU’s willingness to put narrow national or sectoral interests ahead of the common good. UK participation in SAFE would have allowed UK firms to play a major role in projects to improve Europe’s defence capabilities. Thereby it would have increased Europe’s strategic autonomy, at a time when the possibility of defending Europe without US help seems an increasingly realistic scenario. While some EU manufacturers, particularly in France, may profit from the UK’s exclusion, European defence and security overall is likely to suffer.

11: ‘PM’s remarks at press conference with EU leaders : 19 May 2025’, gov.uk website, May 19<sup>th</sup> 2025.

12: ‘Speech on the UK’s future relationship with the European Union: Minister for the Constitution and European Union Relations Nick Thomas-Symonds delivers a speech on the UK’s relationship with the EU, hosted by The Spectator’, gov.uk website, August 27<sup>th</sup> 2025.

There are hints of regret from the EU at the exclusion of the UK from at least the first phase of SAFE. Some officials admit privately that the initial demand that the UK pay €6.5 billion up front, though based on a calculation of how much the UK might benefit from participation in the programme, was not scrutinised closely enough because the negotiations were so hurried. If it had been, someone might have realised that the figure amounted to almost 10 per cent of the UK's defence budget. Starmer has indicated that he might be interested in trying to negotiate UK participation in a second phase of SAFE, though there is no funding for that in the current EU

budget. Some member-states, including Germany and Italy, would support the UK, though France remains firmly opposed.<sup>13</sup>

The EU accuses the UK of being transactional in its approach to the relationship, when London tries (for example) to ensure that rejoining Erasmus+ will not force it to bear the costs of large numbers of EU citizens paying domestic rather than overseas student fees, while smaller numbers of UK citizens go in the other direction. But the EU's approach to UK involvement in EU programmes is just as transactional.

## Prospects for 2026

The new year has begun with a bang. Trump attacked Venezuela and seized President Nicolás Maduro and his wife. He renewed US threats to annex Greenland and then announced that he would impose tariffs on EU countries and the UK as long as they continued to support for Denmark's sovereignty in Greenland, before reversing course on the basis of a vague agreement with NATO Secretary General Mark Rutte. On these issues, the UK position has been close to the European centre of gravity – trying to show support for international law and (in the case of Greenland) for Denmark, a European ally, without provoking Trump's wrath. The UK approach has only been partially successful: after Starmer supported the Danish position on Greenland, Trump threatened the UK with tariffs and attacked the treaty the UK had negotiated with Mauritius over the status of the US military base on Diego Garcia (which the US had previously approved), describing it as "an act of great stupidity".

***“The transition away from the US will be even harder for the UK than EU member-states.”***

Trump's behaviour is likely to be one of the forces shaping the EU-UK relationship in 2026. The vision of "Promoting European greatness" set out in the US National Security Strategy (NSS) published in November 2025 undermines decades of transatlantic solidarity and promises US support for "patriotic European parties" at the expense of mainstream democratic movements in Europe. If the administration takes the NSS as a blueprint for action, governments in France, Germany and the UK (at least) can expect to find the US government working for the victory of populist right-wing parties in future elections.<sup>14</sup> The UK seems to be in Washington's sights because of the number of immigrants and descendants of immigrants in its society, and the "elite-driven, anti-democratic

restrictions on core liberties in... the Anglosphere" – in other words, efforts to regulate the behaviour of US-based internet platforms and social media like Elon Musk's 'X', and to prevent hate-speech.

The Trump administration's actions, particularly its threats to seize Greenland by force – even if cancelled at present – are likely to keep making the case for Europe, including the UK, to reduce its defence dependency on the US. The US National Defense Strategy (NDS) is likely to increase the momentum towards European defence autonomy: it states that "Europe taking primary responsibility for its own conventional defense is the answer to the security threats it faces", and makes clear that the US will provide less support for Europe in future.<sup>15</sup>

As Friedrich Merz – previously a staunch Atlanticist – said on the night of his victory in the Bundestag elections in February 2025, "My absolute priority will be to strengthen Europe as quickly as possible so that, step by step, we can really achieve independence from the USA".<sup>16</sup> Psychologically, the transition away from the US will be even harder for the UK than EU member-states, after almost seven decades of reliance on the 'special relationship' with Washington. The EU and individual member-states would benefit from encouraging the UK to help Merz achieve his objective, rather than trying to extract a price for closer co-operation.

A second influence on the development of relations will be the evolution of Russia's assault on Ukraine. The UK, like the European Commission and most member-states, has been a strong supporter of Ukraine. The UK and France have led the 'coalition of the willing', working to put together security guarantees and a 'reassurance force' to deploy in Ukraine in the event of a ceasefire.

The US NSS implicitly rejects European efforts to support Ukraine's efforts to defend itself, however, stating "The

13: Sam Fleming and others, 'UK and EU to renew talks on defence fund access', *Financial Times*, January 23<sup>rd</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> 2025.

14: 'National Security Strategy of the United States', whitehouse.gov website, November 2025.

15: '2026 NDS: National Defense Strategy', US Department of War, January 23<sup>rd</sup> 2026.

16: Tim Ross and Nette Nöstlinger, 'Germany's Merz vows 'independence' from Trump's America, warning NATO may soon be dead', *Politico*, February 23<sup>rd</sup> 2025.

Trump Administration finds itself at odds with European officials who hold unrealistic expectations for the war perched in unstable minority governments, many of which trample on basic principles of democracy to suppress opposition. A large European majority wants peace, yet that desire is not translated into policy, in large measure because of those governments' subversion of democratic processes." In US-Ukrainian negotiations in Paris on January 6<sup>th</sup>-7<sup>th</sup> 2026, the US still appeared to be pressing Ukraine to concede territory that Russia has been unable to occupy in almost four years of fighting – contrary to the advice of European leaders.

***“European leaders cannot afford to stand aside as Trump tries to force Ukraine into capitulation.”***

If Ukraine's military and social situation deteriorates further, European leaders, including Starmer, will have to grapple with a possible need to deploy forces, or at least put aircraft in Ukrainian airspace, to reinforce Ukraine's own efforts. To increase the economic pressure on Russia, the EU will also need the UK to join in sanctions on providing maritime services for ships carrying Russian oil and gas, given London's central role in areas such as insurance and shipbroking. European leaders cannot afford to stand aside as Trump tries to force Ukraine into a capitulation that would increase the Russian threat to the rest of Europe – a threat downplayed in the NDS, which describes Russia as "a persistent but manageable threat to NATO's eastern members".

A third factor will be the state of the economy, especially in the UK but also in the EU. One of the reasons the UK government gives for sticking to its red lines is that rejoining the customs union or the single market would mean giving up the advantages it has gained from being able to sign free trade agreements independently. The reality, however, is that deals signed since Brexit with Australia, New Zealand, India and others will increase GDP by about 0.2 per cent, according to the government's own figures. That is not much compensation for the loss of 4-8 per cent of GDP as a result of leaving the EU single market and customs union.<sup>17</sup> Even a full free trade agreement with the US – if such a thing were on offer from the Trump administration, rather than a partial deal that increases tariffs on UK goods and is subject to unpredictable changes whenever Trump feels like it – would only increase GDP by a further 0.15 per cent.

The EU remains by far the UK's biggest trading partner, and its share in imports and exports is only slightly smaller than before Brexit. In 2024, UK exports of goods and services to EU member-states made up 41 per cent of total exports, compared with 42 per cent in 2019. For imports, the figures were 50 per cent in 2024, compared with 51.4 per cent in 2019. The UK's next most important partners in 2024 were the US (22.5 per cent of exports, 13.2 per cent of imports) and China (3.6 per cent of exports, 7.7 per cent of imports).<sup>18</sup> But the UK is also a significant partner for the EU – the third largest in goods, behind the US and China, and the second largest in services, behind the US. The EU as well as the UK would benefit from greater integration and the removal of as many as possible of the barriers to trade in goods and services created by Brexit. In that respect, the TCA regime was a better deal for exporters of goods (especially larger firms, for whom the cost of extra bureaucracy is more manageable) than for exporters of services.

A fourth factor will be UK domestic politics. On May 7<sup>th</sup> there will be elections to the Scottish Parliament, the Welsh Senedd and a number of English local authorities. Opinion polls suggest that Nigel Farage's anti-EU Reform UK party will do well, and that Labour will do very badly.

This will create conflicting pressures on the government. Reform's success could lead to the government doubling down on an approach to the EU which emphasises UK sovereignty and a refusal to integrate more closely with the single market, in an effort to persuade former Labour-voting Reform supporters to return to Labour; or it could lead the government to prioritise more integration as the way to ensure economic growth, ignoring criticism from the Conservatives and Reform UK, in the hope that growth will have more resonance than Brexit purity with voters in general, and will prevent Labour losing votes to more explicitly pro-EU parties including the Liberal Democrats, the Greens and nationalist parties in Scotland and Wales.

In his January 4<sup>th</sup> 2026 BBC interview with Laura Kuenssberg, Starmer hinted that he might take the latter approach, telling her "if it's in our national interest... to have even closer alignment with the single market then we should consider that", but stressing that he would rule out a customs union with the EU (since that would involve giving up the other trade agreements the UK has reached with non-EU countries) and any return to the free movement of labour. The government is reportedly planning to introduce a bill allowing for dynamic alignment with EU rules relevant to areas where it is negotiating for greater integration into the EU market, including food standards and emissions trading.<sup>19</sup>

17: Cited in John Springford, 'The economic impact of Brexit, nine years on: Was the consensus right?', The Constitution Society, June 23<sup>rd</sup> 2025.

18: 'Trade and investment core statistics book', gov.uk website, updated December 19<sup>th</sup> 2025.

19: Dan Bloom and Sophie Inge, 'UK readies bill to move closer to EU', Politico, January 6<sup>th</sup> 2026.

One of the considerations for Starmer will be how to position himself on the EU in the event of a challenge to his leadership of the Labour Party, if the May 2026 elections go as badly as predicted. Among his potential rivals for leadership of the Labour Party, health secretary Wes Streeting has hinted that the UK should have a customs union with the EU, while the mayor of Greater Manchester, Andy Burnham, has said that he hopes the UK will rejoin the EU in his lifetime.

Domestic UK politics as well as the global situation will also affect the final factor in the evolution of relations in 2026 – the EU's attitude. Berlin may have a special role to play in encouraging both the UK and the EU to cross their red lines and seek a more far-reaching *rapprochement*: the UK-Germany Kensington Treaty states that a positive development of the EU-UK relationship is in their shared interests; and Merz's remarks on strengthening Europe in order to achieve independence from the US could be read as including non-EU European countries like the UK. Other EU member-states with particularly close relations with the UK, such as the Nordic and Baltic countries, might also be in favour of putting the toxic experience of Brexit behind them. Then they could face threats from Russia and elsewhere as part of a wider European coalition (and perhaps an even larger grouping, including Canada and other democratic partners).

**“Berlin may have a special role to play in encouraging more far-reaching EU-UK rapprochement.”**

The conundrum for the EU is that while a recent opinion poll put UK voters' support for rejoining the EU at 58 per cent, it also showed that if an election were held now, Reform UK would probably be the largest party in the Commons.<sup>20</sup> Member-states may feel that this shows that the UK itself has not put Brexit behind it. In that case, it would be tempting to leave officials in Brussels to continue on their current course, turning every proposal for an improvement in relations into a fight, even when there are benefits to both sides from progress, thereby limiting the potential gains for both sides and ensuring that the EU-UK relationship remains tense and sub-optimal.

Member-states may also be reluctant to offer the UK a better deal, let alone start thinking about conditions for the UK to rejoin the EU, if there is a serious prospect of a future Reform UK government putting everything into reverse a few years later. There are already reports that the EU is demanding a 'Farage clause' in the negotiations

for an SPS agreement, obliging a future UK government to pay compensation to the EU if the UK withdrew from the agreement.<sup>21</sup> The UK government may end up in Catch-22: it needs a better trade relationship with the EU to drive growth and reduce Reform UK's chances of leading the next government, but the EU will only give it a significantly better deal once it is sure that Reform UK will not gain power.

There are two timetables for the EU and UK to keep in mind in 2026. First, the two sides agreed at their May 2025 summit to hold such meetings annually – and though no exact date has been agreed yet for the next summit, the expectation is that it will be held in May, after the UK local elections. Second, the TCA obliges the EU and UK to conduct a joint review of the implementation of the agreement itself, any supplementary agreements "and any matters related thereto" five years after its entry into force – in other words, starting around May 1<sup>st</sup> 2026.

Both the timing and content of the next summit are up to the EU and UK to decide, but such meetings always create pressure for 'deliverables' – something for leaders to point to show that the meeting was a success, and they did not meet just for the sake of it. So far, the message from both sides seems to be that by the time of the next summit they want to be able to show concrete progress – though probably not final agreement – on some of the key dossiers identified in the Common Understanding and the SDP. That is a reasonable minimum aim, but not a dramatic advance. As the analysis in the annex shows, the two documents between them lay out a very broad agenda, but in many areas not a very deep one; there is room to take implementation much further.

The timing of the TCA review is fixed, but its content is also up to the parties to decide. In evidence to the House of Lords European Affairs Committee after the EU-UK summit, Thomas-Symonds suggested that the review had been overtaken by the summit decisions, since some of these (for example, the UK rejoining the single market for electricity) would involve amendments to the TCA. But the review will still have to take place; the question is how substantive the two sides want it to be. It could be a cursory examination of implementation problems, or they could supplement the TCA with agreements on new areas of co-operation.<sup>22</sup>

For most of the period since it entered into force, the EU's position has been that the 2026 review should be a technical process, looking at issues that have arisen with implementation, not a major review of the substance of the TCA. Maroš Šefčovič, the commissioner responsible for negotiations with the UK, warned in 2023 that the

20: 'The Mirror end of year poll', Deltapoll, January 5<sup>th</sup> 2026.

21: Peter Foster, George Parker, Anna Gross and Andy Bounds, 'EU demands 'Farage clause' as part of Brexit reset talks with Britain', *Financial Times*, January 11<sup>th</sup> 2026.

22: Joël Reland and Jannike Wachowiak, 'Reviewing the Trade and Co-operation Agreement: Potential paths', *UK in a Changing Europe*, September 19<sup>th</sup> 2023.

TCA review clause did not “constitute a commitment to reopen the TCA or to renegotiate the supplementary agreements”.<sup>23</sup> Others, particularly on the pro-EU side in the UK, had greater ambitions. Starmer himself, while still leader of the opposition, said that he wanted to use the review to try to get “a much better deal”.<sup>24</sup> The May 2025 summit showed the Commission conceding that the review should be at least slightly more ambitious. The Common Understanding has launched negotiations on issues such as UK integration into the EU electricity market that will require amendments to the TCA. The SDP covers ground that the Johnson government refused to discuss with the EU, and some of the elements in it could also end up as amendments to the TCA.

In the end, however, if the UK sticks to its red lines and the EU views every change to the TCA as an item that

the UK must pay for, the best the review can achieve is incremental progress. Is that enough, given the pressures on both the EU and the UK? As US tariffs and Chinese overcapacity squeeze the EU and the UK alike, Europeans in general could benefit from reducing barriers to trade in goods and services throughout Europe, not just inside the EU. Agreements on SPS and electricity trading will improve things slightly, but they will not be game-changing.

In the security sphere also, Russia continues to arm itself, beyond even what it needs for its war in Ukraine, and the US has proclaimed its reduced interest in defending Europe. If the UK and EU both camp on their positions in relation to SAFE, both will be the losers in terms of their own security, at a time when they most need to work together.

## Conclusion

The world in 2026 is very different from that in 2016, when the UK voted to leave the EU, or even that in 2021, when the EU-UK Trade and Co-operation Agreement (TCA) entered into force. Progress in the EU-UK relationship since the May 2025 summit does not adequately reflect the scale of the changes. Though the relationship is closer than it was, advances have been gradual. Both sides (but especially the EU) often act as though every move towards closer partnership is zero-sum.

*“The next stage of the EU-UK reset cannot be a minor upgrade to individual elements of the relationship.”*

Neither side seems to have grasped the threats to them from this new world. The UK is clinging on to a special relationship with the US that has been gravely, perhaps irreparably, damaged, while Labour’s red lines on the single market, customs union and freedom of movement limit potential *rapprochement* with the EU and the consequent economic benefits. In the EU, there still seems to be a lingering desire to punish the UK for Brexit, and to extract a price for every step towards greater integration, even when both sides will benefit from it. But the rules-based international order on which both have relied for their security and prosperity – which has often looked threadbare in the past – has more or less disintegrated under attacks from Moscow and Washington.

Europe as a whole needs to work together more closely if it does not want to be reduced to a group of vassals of one or another great power. European strategic autonomy – long viewed in London as a French fantasy – has become a necessity. The wider the gap between US and European values and interests becomes, the harder it will be for the UK to stand aloof from the rest of Europe without damaging its own interests. For Europe too, there is more to be gained from a closer partnership with the UK than from keeping it at arm’s length. The next stage of the EU-UK reset cannot be a minor upgrade to individual elements of the relationship. It should instead be the moment for a fundamental rethink of how both sides can enhance their security and prosperity and Europe’s ability to stand up for its interests. This is the year to reset the reset.

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**February 2026**

This policy brief is the last of a three-paper CER/KAS project, ‘Navigating stormy waters: UK-EU co-operation in a shifting global landscape.’ The first policy brief was ‘Will EU enlargement create new models for the EU-UK relationship?’ by Luigi Saccoccia. The second was ‘China and Europe: Can the EU and the UK find a shared strategy?’ by Ian Bond.

23: Andy Bounds and Peter Foster, ‘Barriers to post-Brexit trade likely to ‘deepen’ further, warns EU’, *Financial Times*, June 12<sup>th</sup> 2023.

24: George Parker, ‘Keir Starmer pledges to seek major rewrite of Brexit deal’, *Financial Times*, September 17<sup>th</sup> 2023.

## 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.

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.

★ **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

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.

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.

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

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

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.

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.

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.

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.

★ **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

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

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.

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.

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.

## 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

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 Sorgi, ‘EU sets conditions for UK payments into SAFE defense 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.

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

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.

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

43: Iulian Romanyshyn 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.

★ **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

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.

<sup>49</sup>: 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.