UK IN A CHANGING EUROPE

TEN YEARS ON: WHAT NEXT FOR UK–EU RELATIONS?

FOREWORD

UK in a Changing Europe was formally launched in 2015. Since that time, we have been engaged in the debate about Brexit and its implications. To mark the 10th anniversary of the referendum, we have put together this report outlining some of the impacts of leaving the EU and the possible future forms of the UK–EU relationship.

My grateful thanks as ever to those in our team – John Curtice, Jonathan Portes, Joël Reland and Jannike Wachowiak – and those not formally linked to us (John Springford) for their work in putting this report together. I'd also like to acknowledge the partnership with Ipsos and the KCL Policy Institute, which provided the new public opinion data we draw on.

It's been an incredible ten years, in the literal sense of the term. During that time, I trust we've succeeded in explaining and clarifying the bewildering number of issues raised by that fateful vote. Our ambition has always been to produce clear, accessible and timely analysis, and I hope what follows is true to that ambition.

As ever, if you have comments or suggestions, do get in touch.

15 June 2026

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EXECUTIVE SUMMARY

WHERE WE ARE

- There is a broad consensus that Brexit has made the UK economy smaller than it otherwise would have been. This has not been a sudden collapse, but a gradual and cumulative drag on trade, investment and productivity.
- EU migration has fallen sharply as a result of Brexit but been more than offset by increased migration from outside the EU, with mixed economic impacts.
- Since late 2022, there has been a clear and consistent majority of voters in favour of rejoining the EU. On average, across polling this year, 60% are in favour of rejoining while 40% would choose to stay out.
- After several years where Brexit was barely discussed, UK political parties are starting to confront the issue again. Labour is arguing that closer EU relations are the "biggest prize" available to the UK economy, while Reform and the Conservatives have promised to tear up any new EU agreements signed by the Labour government.
- The Starmer government has sought to 'reset' relations with the EU by negotiating a handful of new agreements on economic, cultural and security cooperation. The only agreement so far completed is the UK's reassociation to Erasmus+.
- The estimated boost from the reset agreements, if completed, is, at best, half a percent of GDP. This far from offsets the damage which the government, and most economists, think Brexit has done to the UK economy.

WHAT DOES THE FUTURE HOLD?

- The Labour government wants deals to 'align' with the EU single market for goods while maintaining its 'red lines' of no single market, customs union or free movement. The EU has little appetite for giving the UK such preferential treatment.
- In order to unlock greater economic gains, Labour would have to choose from one of the EU's established 'models' for integration: 1) a customs union, 2) a Swiss-style deal, 3) EEA (single market) membership, or 4) rejoining the EU.
- Greater market access requires greater alignment and, in the case of 2, 3 and 4, will also involve significant payments to the budget and free movement of people.

- Only under rejoin would the UK have a real say over the EU rules it is signed up to.
- When presented with these four options, voters' clear preference is for rejoining the EU (with a referendum) over the other 'halfway house' options.
- There is no guarantee that the EU would accept a UK request for any of these four options - though it would be obliged to consider an application for EU membership.
- Reform and the Conservatives have both pledged to take the UK out of the European Convention on Human Rights (ECHR). This would likely lead to the suspension of the UK-EU Trade and Cooperation Agreement: adding major costs to UK trade with the EU and necessitating the renegotiation of the Belfast/Good Friday Agreement.

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INTRODUCTION

Brexit is back. From the Prime Minister's assertion that Britain should be "at the heart of Europe" to Wes Streeting's casual observation that Britain's future lies "one day back in the European Union", the UK's relationship with the EU is once again up for debate.

One reason is economic. The government has decided it can no longer ignore the economic damage caused by Brexit. In her recent Mais lecture, the Chancellor pointedly spoke of an 8% hit to GDP, a figure at the higher end of available estimates. Which is at least superficially strange, given that Labour continues to pursue a 'reset' with the EU that will do little to ease the pain: the government's own forecasts project a long-term boost to GDP of under half a percent. The contradiction between the "deep" economic damage Labour is lamenting and its timid attempts to paper over the cracks is increasingly difficult to maintain, particularly for a government that has declared economic growth its number one priority.

Another is political. For his first eighteen months in office, Keir Starmer seemed intent on turning Brexit into a non-issue. His government's focus was on retaining, and in some cases winning back, voters in Leave-voting 'red wall' constituencies in the Midlands and the north of England, where Nigel Farage's Reform is often the main party of opposition. This translated into a muted stance on the UK's relationship with the EU, apart from a firm repetition of core manifesto commitments (no single market, customs union or free movement) designed to demonstrate that Boris Johnson's Brexit deal was safe in Labour's hands.

This strategy is beginning to change. At the last two sets of local and devolved elections, Labour has lost more votes to the Greens, Lib Dems and nationalist parties than to Reform and the Conservatives, and the thinking in Labour circles seems to be that a bolder approach on the EU might be just the recipe to win them back. And with opinion polling showing the wider public to be increasingly supportive of closer EU relations, talking about Brexit is no longer the automatic vote-shredder Labour once assumed it to be (even if Reform's consistent lead in the polls continues to give pause for thought).

But the Prime Minister is not the only one trying to capitalise on Europe. Some challengers from inside the party have sensed an opportunity to outflank him, knowing full well that any leadership contest - if there is one - may be decided by the party's overwhelmingly pro-European membership. And for Labour members, it seems, the offer cannot be bold enough: almost two thirds would like to see the party commit to rejoining the EU at the next general election.

All this suggests a return to the heated discussions of the past on what type of relationship the UK should pursue. This has already started, with proposals ranging from the government's preference to selectively align with the single market, to the Liberal Democrats advocating a customs union, to backbench Labour MPs calling for a 'Swiss-style' agreement, to Wes Streeting expressing a desire to rejoin (one day), and Sadiq Khan calling for rejoin to be in the next Labour manifesto. At the other end of the spectrum sit Nigel Farage and Kemi Badenoch, with their intention not only to rip up Labour's reset but also leave the European Convention on Human Rights, which, by default, would collapse the Trade and Cooperation Agreement.

This leaves the government with much to ponder. Ten years after the vote to leave, Brexit is being debated again, and indeed the head of the Leave campaign has been moved to suggest that the next election will be a 'rerun' of that referendum. This report sets out in detail the latest data and analysis. It first considers the progress of the EU 'reset' to date, before considering how Brexit has impacted the UK economy, public opinion, and politics in the UK and EU. This is, by design, not an exhaustive assessment of all Brexit's impacts - important topics like devolution are left untouched, but can be read about in our Brexit ten years on blog series. We have chosen to focus on the issues likely to be paramount in the government's thinking about the future EU relationship.

Which is the topic to which the report finally turns, setting out the various options available to the UK should it seek a different 'model' of relationship with the EU. These range from undoing the reset and leaving the ECHR through to rejoining the EU. In each case, we assess the potential impact on the UK's economy, security and on net migration, while assessing the political and practical feasibility of each option.

The beauty of each model is in the eye of the beholder. Each carries clear trade-offs, particularly between the autonomy to set your own rules and integration with the EU market. Understanding these trade-offs should be the starting point of any discussion on future EU policy.

SECTION 1:
WHERE WE ARE

LABOUR'S EU 'RESET' SO FAR

Labour came to power in July 2024, promising to 'reset' relations with the European Union by 'rebuilding relationships' and 'tearing down barriers to trade'. Rishi Sunak had done much to rebuild relations by agreeing the Windsor Framework with the EU - demonstrating that both sides could work in good faith to address the troubled implementation of the Protocol on Ireland/Northern Ireland. But investing in warmer relations and trust was still a prerequisite for talks about trade barriers - and the government wasted little time in getting to work. Europe-facing ministers immediately jetted off to EU capitals, and within a fortnight Keir Starmer had met a panoply of European leaders at a NATO summit and hosted a European Political Community summit in Oxfordshire.

The EU welcomed the UK's warm overtures, but soon started to express impatience about the vagueness of the government's plans for the wider relationship. They had a clear sense of Labour's red lines - no single market, customs union, or freedom of movement - but were left guessing as to what the desired 'reset' should entail. It took over ten months to define a clear way forward, unveiled in the form of a 'Common Understanding' at the May 2025 UK-EU summit (the first high-level political summit between the two sides since Brexit).

The UK and EU committed to explore negotiations on three new agreements to deepen trade ties: on 'SPS' (animal and plant goods), 'ETS' (carbon pricing systems) and electricity. There was also a commitment to explore the UK's participation in the EU's €150bn 'Security Action for Europe' (SAFE) instrument for common defence borrowing; a 'youth experience scheme' allowing young EU nationals to live in the UK for a defined period of time (and vice-versa); and for the UK to reassociate to the Erasmus+ educational exchange programme.

Before agreeing to the Common Understanding, the EU insisted that the terms of cooperation on fisheries (and energy) be rolled over, to avoid regular renegotiations on quota shares. The 12-year extension of fishing rights, on the same terms agreed by Boris Johnson, was seen as a big concession in some quarters. A new 'Security and Defence Partnership' (SDP) was also agreed to enable strategic dialogue and consultation on a wide set of topics ranging from the war in Ukraine to global health to women's rights to climate security.

In some senses, these developments were quite profound: the SPS, ETS and electricity agreements all entail UK 'dynamic alignment' with EU law (systematically adopting relevant EU rules with very little say over them).

For the Conservatives, regulatory sovereignty was absolute, while for Labour it is fungible; something which can be traded off for economic gains. As Minister for European Union Relations, Nick Thomas-Symonds, subsequently put it: "as a sovereign country, we decide where it works for us. This government thinks that in some cases, like SPS, it is in our national interest to align with the EU." Yet the economic gains on offer from the dynamic alignment deals amount to a fraction of a percent of GDP - hardly the 'tearing down barriers to trade' which Labour's manifesto promised.

Another issue is that none of the commitments, bar Erasmus+, have yet been fulfilled. The Common Understanding did little more than point to future negotiations. One year later, the bulk of these are still ongoing. Partly, this is because negotiations were slow to start, with member states taking six months to authorise the mandates on SPS and ETS, and almost a year for electricity. But it is also because of seemingly unbridgeable disagreements, particularly on the level of university tuition fees which EU students should pay in the UK under the much-touted youth experience scheme.

The defence and security commitments are also yet to yield much fruit. The SDP is non-binding and does not include next steps or milestones, though it has led to the establishment of some new regular formats for dialogue. Most importantly, the SDP was supposed to open the door to UK participation in SAFE, but talks collapsed in November 2025 due to disagreement over the size of the UK's financial contribution. Both sides have recently indicated an interest in the UK's participation in the EU's Ukraine loan scheme, which could become a stepping stone to renewed talks on SAFE.

Ahead of the next summit, potentially set for this summer, the challenges are twofold. First, whether key negotiations on SPS, ETS and youth experience can be completed, allowing the two sides to demonstrate tangible progress. The EU has made clear that it will not sign off on key UK demands (like an SPS deal) until a youth experience agreement is also finalised. Unless a mutually agreeable landing zone can be found, the second summit could be postponed (as recent reporting has hinted).

The second challenge is whether the reset can be developed further, with new items brought onto the agenda. In April this year, Starmer stated that, at the next summit, "the UK will not just ratify existing commitments made at last year's summit. We want to be more ambitious. Closer economic cooperation. Closer security cooperation." The likely challenge to Starmer's leadership is not conducive to this aim, as the EU will see little point in embarking on new talks with the Prime Minister if his days appear numbered.

Nor have the Starmer administration's proposals seemingly gone down that well. The UK recently pitched the idea of a 'single market for goods' - entailing comprehensive alignment with EU goods law in exchange for single market access, but without free movement of people or services. The EU rejected the proposal on the grounds that the UK could not "get a better deal" than member states, or other third countries like Switzerland or Norway, by picking and choosing which bits of the single market it participates in. The EU is unlikely to be open to much more UK sectoral alignment with the single market unless it is willing to make the same compromises as the Swiss or Norwegians - accepting free movement and making major budget contributions. It is under no compulsion to do so even should the UK make these commitments, and much will depend on how member states view the potential economic impact on them of any new arrangement.

In sum, the Labour government has largely succeeded in its objective of improving relations with the EU. Interpersonal ties are strong and there is a genuine commitment from both sides to try and deepen cooperation where possible. But the government remains tightly boxed in by its own red lines and has learned the hard way about the complexity of negotiating even piecemeal changes with the Commission and member states. Warmer relations alone are not enough to prise economic concessions out of the EU.

SECTION 2:
HOW WE GOT HERE

BREXIT AND THE ECONOMY

Brexit has always implied trade-offs. It represented a move away from deep economic integration with the EU towards greater domestic policy autonomy, particularly over migration, regulation and trade policy. The Trade and Cooperation Agreement (TCA) largely preserved tariff-free trade in goods but introduced significant non-tariff barriers, limited services access, and ended free movement of people. In economic terms, this amounted to a substantial increase in trade costs with the UK's largest trading partner, alongside a fundamental restructuring of the migration system.

The question was never whether this would involve costs. It was how large those costs would be, how quickly they would appear, and whether the gains from autonomy would offset them.The outcome is now increasingly well evidenced. While estimates vary across methodologies, there is a broad consensus in the academic and policy literature that Brexit has made the UK economy smaller than it otherwise would have been. This has involved not a sudden collapse, but a gradual and cumulative drag on trade, investment and productivity.

GDP and overall performance

Pre-referendum modelling exercises, summarised by the Office for Budget Responsibility (OBR) and others, suggested that a free trade agreement-type outcome (broadly corresponding to the TCA) would reduce long-run UK GDP by around 2-6%, with larger estimates where the long-term impact of lower trade on broader economy-wide productivity is included.

Early estimates suggested that the impact of the referendum result on UK growth was negative, but relatively modest. However, as time has passed, and since the implementation of the TCA in January 2021, the consensus in the economic literature has converged on larger and more persistent effects, at least as large as those estimated by the OBR. A wide range of different modelling approaches now point in a similar direction.

In particular, synthetic control analyses, which try to estimate the impact of Brexit by comparing UK performance to a weighted basket of advanced economies that tracked UK GDP growth before 2016, typically find UK GDP around 4-5% below its no-Brexit path to date, although estimates vary depending on what time period is used and what countries are used as the comparison group.

More recent work, notably Bloom et al. (2025), extends this analysis by incorporating firm-level and sectoral evidence. Their 'slow burn' characterisation emphasises that Brexit operates not as a one-off hit to the level of GDP, but as a persistent drag on growth. They estimate that, by the mid-2020s, UK GDP per capita was around 6-8% lower than it would otherwise have been, reflecting cumulative effects on trade, investment, the labour market and productivity.

This interpretation is consistent with the conclusions of broader research on the impact of trade on the economy. This finds that reduced openness to trade impacts the economy not just directly, by making it harder and more expensive to import or export, but also indirectly, by reducing productivity in the economy as a whole. This is because trade increases competition and innovation, allows companies to access bigger markets and hence grow bigger, and leads to knowledge transfer across borders. The fact that these impacts are likely to grow slowly over time also helps explain why the UK avoided an immediate post-referendum recession, but has since experienced relatively weak productivity and real wage growth.

Three caveats remain. First, explaining the UK's poor economic performance is inherently difficult: the post-2016 period witnessed the pandemic, energy shocks and other idiosyncratic factors. While Brexit is unique to the UK, and the others are not, it is still of course possible that in some respects the UK was more adversely affected than other countries. Teasing out which factor accounts for which outcome is very difficult, although it seems intuitively convincing that Brexit is a major factor.

Second, synthetic counterfactuals look at a wide range of advanced economies, identifying a selection of countries whose pre-Brexit growth trajectory matches that of the UK - and who, as it turns out, have outperformed it since. However, against individual major European economies - especially Germany - is somewhat less negative. This implies that, absent Brexit, the UK would have substantially outperformed Germany - which to some may sound implausible. However, it need not be, given recent global developments: in particular fast growth in services trade (which benefits the UK) and the sharp fall in Chinese imports of goods like cars (which hurts Germany).

Finally, it is possible that the political turmoil that has afflicted the UK for much of the post-Brexit period has, directly or indirectly, had negative economic consequences, whether by increasing uncertainty and reducing business confidence, or by adversely impacting the capacity of government to make and implement good economic policy. Whether this is a 'Brexit impact' is a matter of interpretation.

Trade

Trade is both the most directly affected channel and the best understood analytically. The empirical trade literature – particularly gravity models, which relate trade volume to physical distance – provides robust evidence that deep integration arrangements like the EU single market significantly increase trade volumes.

The TCA, provided for tariff-free trade between the UK and the EU (at the cost of paperwork to prove goods qualified), but more importantly introduced a wide range of non-tariff barriers: customs checks, regulatory compliance costs and the loss of automatic mutual recognition. These frictions can be expected to reduce trade volumes, especially in modern economies where supply chains extend across borders and just-in-time production is common.

Empirical evidence broadly matches these predictions. UK goods trade has underperformed both pre-Brexit trends and comparator economies. Estimates using synthetic control methods suggest that UK goods exports are around 10-15% lower than they would otherwise have been, with similar or larger effects on imports. This is consistent with the OBR's long-run assumption that Brexit will reduce UK trade intensity by around 15%.

One apparent puzzle is that the aggregate data do not always show a simple collapse in UK-EU trade relative to trade with the rest of the world. But this is less reassuring than it looks. One explanation is that Brexit has disrupted the UK's role in global supply chains, which often involve both EU and non-EU countries, thus reducing trade with both the EU and the rest of the world.

Another possible reason is that intra-EU trade rose more than trade between the EU and the rest of the world after the pandemic, as consumers spent their lockdown savings and businesses upgraded their machinery and equipment. Had the UK remained a member, its EU trade might also have risen substantially.

Still another is compositional: larger firms, which dominate aggregate trade flows (and are probably better captured in trade data), have been better able to absorb new trade costs, while smaller firms have exited export markets altogether. The result is that aggregate trade flows can look relatively resilient while the number of firms exporting to the EU falls.

Firm-level evidence supports this interpretation. Studies using customs and VAT data find substantial declines in the number of UK firms exporting to the EU, particularly among small and medium-sized enterprises, alongside increased concentration of exports among larger firms. That matters, because exporting is one route through which smaller firms grow, innovate and become more productive.

Services trade presents a more mixed picture. Overall services exports, which include business services like legal services, accountancy and consultancy, have held up relatively well, reflecting the UK's strong position in high-value, digitally deliverable services and the reduced importance of physical borders. Trade in these sectors has grown rapidly at a global level, and the UK has taken advantage of that.

However, this masks sectoral variation: financial services and other regulated sectors have faced new constraints due to the loss of 'passporting', which allowed firms regulated in the UK to sell financial services directly to EU customers. This has not threatened London's position as the UK's leading financial centre, but some business and jobs have been lost, and growth has been slower than it would otherwise have been.

Investment, uncertainty and productivity

The impact of Brexit on investment is less directly observable but potentially more important for long-run performance. The relatively low level of business investment in the UK has long been recognised as one of the factors behind the UK's poor growth performance. There is substantial evidence that being both more open to trade and having a stable policy environment are important factors driving investment decisions, particularly for multinational firms.

Evidence from both macro and firm-level data suggests that Brexit has had a significant negative effect on UK investment. Bloom et al. estimate that business investment is around 12-18% lower than it would have been absent Brexit, attributing this to a combination of heightened uncertainty, reduced market access, and lower expected returns.

This is consistent with earlier work which found that firms more exposed to Brexit uncertainty reduced investment more sharply in the years following the referendum. The persistence of this effect reflects both the protracted nature of the Brexit process and ongoing uncertainty about the future UK-EU relationship.

This matters because productivity growth depends heavily on investment. If investment is lower for a sustained period, the economy's productive capacity suffers. Brexit has therefore compounded one of the UK's pre-existing weaknesses: poor productivity performance since the financial crisis.

Migration and labour markets

The end of free movement represents a second major structural change, although its economic effects are more complex and less clearly negative than those operating through trade.

As expected, EU migration has fallen sharply, from a pre-referendum peak of over 200,000 per year to negative net flows. This has reduced labour supply in sectors that previously relied heavily on EU workers, including hospitality, agriculture, logistics and parts of manufacturing.

However, this decline has been more than offset by increased migration from outside the EU, facilitated by a more liberal and skills-focused visa system. The result is a substantial shift in the origin of immigrants rather than a reduction in overall migration.

EU migration has fallen dramatically since Brexit, but been more than offset by non-EU migration

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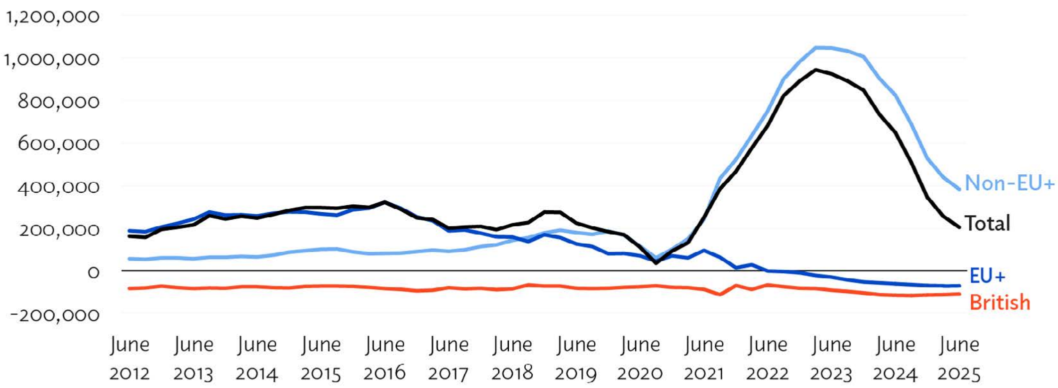
Long-term net migration of non-EU+, EU+, and British nationals in the UK, year ending June 2012 to year ending June 2025.



Source: Office for National Statistics, Long-term international migration, provisional: year ending June 2025.
**Estimates from Sep 2024 onwards are provisional. EU+ is all current EU countries plus Norway, Iceland, Liechtenstein and Switzerland.*

Recent research paints a detailed picture of this reallocation. Relative to a no-Brexit counterfactual, there are significantly fewer EU-born workers but substantially more non-EU workers, particularly in health and social care, as well as in high-skill sectors such as professional services and ICT. This reflects both policy design and post-pandemic labour demand.

The economic implications are mixed. The reduction in EU migration has reduced labour market flexibility and contributed to shortages in some sectors. As economists predicted, however, the result has not been sustained wage increases; companies have mostly adjusted through higher prices and reduced output.

At the same time, the increase in non-EU migration – often in higher-skilled occupations – may have supported productivity. Evidence on earnings trajectories suggests that recent non-EU migrants enter higher in the wage distribution and experience relatively rapid earnings progression, implying positive fiscal and productivity contributions.

Overall, the evidence suggests that migration changes have increased total GDP (since the rise in non-EU migration has more than offset lower EU inflows) but have relatively small and ambiguous effects on GDP per capita. This is consistent with the broader migration literature, which finds positive impacts on productivity overall, but ones which vary depending on the skill composition of new migrants.

Interactions with current economic challenges

The UK's current economic challenges – weak productivity growth, low investment, fiscal pressures and regional disparities – largely pre-date Brexit but have been exacerbated by it.

Reduced trade intensity and investment directly weaken productivity, the UK's central economic problem. The reduction of labour market 'flexibility' – the way in which the labour market responds to changes in demand, particularly in lower-wage sectors – can be a drag on growth and can contribute to inflationary pressures. At the same time, weaker growth reduces tax revenues, limiting its ability to respond to shocks.

Brexit has also altered the policy trade-offs facing the UK. The ability to set our own regulations for goods and services, rather than being tied to EU rules, offers potential benefits, because the regulations can be better attuned to UK needs, but these have so far proved limited and uncertain. And the downsides are very real – moving away from EU rules has increased trade frictions in a much wider range of areas.

Similarly, new trade agreements with non-EU partners are estimated to have relatively small economic effects – typically fractions of a percentage point of GDP – compared to the losses from reduced EU integration. The UK's new independent trade agreements have not led to greater openness than the EU to countries outside Europe, because the EU has negotiated its own agreements with India, Australia, Indonesia and the Mercosur bloc since Brexit.

The May 2025 'Common Understanding'

Against this backdrop, incremental improvements in the UK-EU relationship take on economic significance. The May 2025 'Common Understanding' can be seen as part of a gradual process of adjustment and partial rapprochement.

Its economic impact will depend on whether it delivers meaningful reductions in non-tariff barriers. Targeted agreements could reduce costs for firms, especially smaller exporters, and improve market access in specific sectors.

However, the academic literature – as well as the government's own official estimate – suggests that the gains from such measures are likely to be very modest relative to the overall impact of Brexit: adding less than half a percent to long-term GDP. The largest economic benefits to be derived from the EU require deep integration – particularly participation in the single market – which the TCA does not provide for and which the government continues to treat as a red line it will not cross.

BREXIT AND PUBLIC OPINION

On 23 June 2016, the UK public voted narrowly – by 52% to 48% – in favour of leaving the EU. Unsurprisingly, many politicians have felt obliged to respect that decision, even if they themselves had voted and campaigned to Remain. But how well has the original verdict withstood the test of time? Is there still majority support for being outside the EU – or has there been a change of heart? And even if many still back Brexit, is there support for making significant changes to the post-Brexit relationship that Boris Johnson's government negotiated with the EU?

People's response when, since June 2016, they have been asked whether they would vote to be inside or outside the EU is shown in the graph below. Support for Brexit has certainly ebbed and flowed during the last ten years. Initially, the narrow majority in favour of leaving the EU remained in place. However, the balance of opinion tilted in the opposite direction following the failure of Theresa May's attempt at the 2017 general election to increase her parliamentary majority with a view to being better placed to deliver Brexit. Thereafter, only during one relatively short period has there been consistent majority support for being outside the EU – the first eight months of 2021. This, of course, was immediately after the successful conclusion of the negotiations over Britain's future relationship with the EU, which were concluded in December 2020. Even at the time of the 2019 general election, when Boris Johnson won the parliamentary majority that enabled him to 'get Brexit done', only 47% were in favour of leaving, a mood that was reflected in the fact that only 47% of the votes were cast for parties backing Brexit.

Since late 2022 a clear majority of voters have been in favour of rejoining the EU

Vote intentions for a second EU referendum since June 2016.

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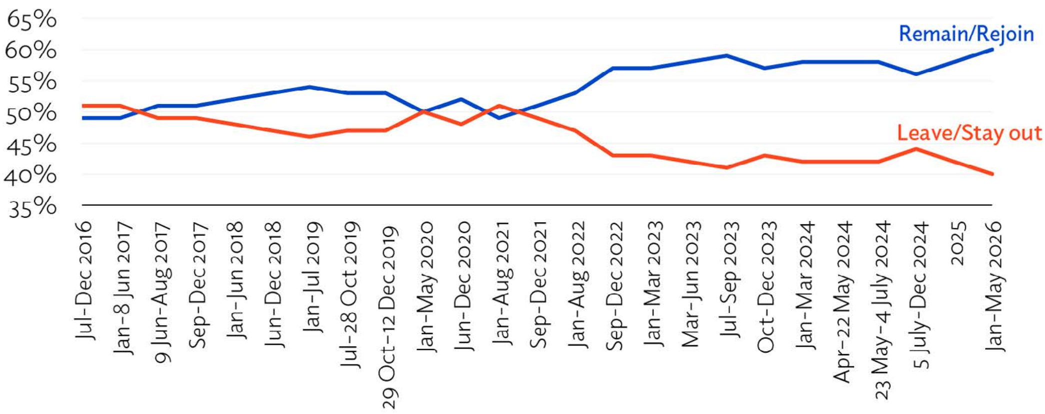


Source: based on all published polls of how people would vote in a second EU referendum as collated at whatukthinks.org/eu. Those saying 'Don't Know' etc. excluded . Until 2020 most polls offered as the response options, Remain vs. Leave, while thereafter they increasingly offered (Re-)Join vs. Stay out.

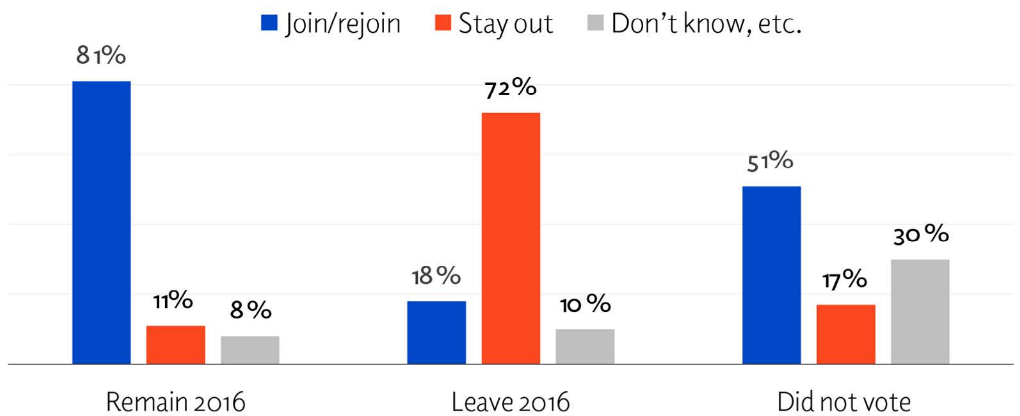
Moreover, the change of mood after Brexit was completed did not last long. In September 2021, there was a shortage of fuel at some petrol stations, while some supermarket shelves were unusually bare. It was argued these shortages had arisen because it was now more difficult for EU lorry drivers to work in the UK - and this episode appears to have put Brexit in a less favourable light for some. Then, a year later, Liz Truss succeeded Boris Johnson as Prime Minister. She immediately announced both cuts in taxes and increased spending to help people pay their energy bills, which had risen dramatically in the wake of the full-scale Russian invasion of Ukraine. The markets took fright, support for the Conservatives nosedived, and Truss soon resigned. At the same time, support for rejoining the EU rose by four points to 57%. Since then, only once, in the months immediately after the election of a new Labour government in 2024, has the average level of support for rejoining fallen below that figure. Most recently, support for rejoining the EU has stood at 60%, as high as it has ever been.

The decline in support for Brexit has not simply been occasioned by voters changing their minds. True, the chart below shows that, whereas 81% of those who voted Remain would now vote to rejoin the EU, only 72% of Leave supporters say they would vote to stay out of the EU. However, much of the change of outlook is to be found in the attitudes of those who did not vote in 2016 - they are three times more likely to say they would vote to join the EU as they are to say they would back staying out. Some of this group comprises those who chose not to exercise their vote in 2016. However, others will have been too young to do so, and they are especially opposed to Brexit. According to the polls used in the chart, two-thirds (67%) of those aged 18-24 are in favour of rejoining the EU, while just one in eight (13%) would vote to stay out.

Much of the increase in support for rejoin comes from those who did not vote in 2016

Current EU referendum vote intention, May 2026, by EU Referendum vote, June 2016.

UK IN A CHANGING EUROPE



Source: Average of polls by Lord Ashcroft, BMG, Deltapoll, and YouGov, May 2026. The YouGov poll asked people whether they supported or opposed the UK leaving the EU.

Crucial to this change of outlook have been perceptions of the economic consequences of Brexit. According to research undertaken via the NatCen Opinion Panel (see Curtice, 2026), by the autumn of 2024 nearly half (47%) of those who voted Leave in 2016 had concluded that the UK was worse off economically as a result of Brexit. Only two in five of those who had come to this view (40%) said they would now vote to stay out of the EU. Meanwhile, as many as 82% of those who did not vote in 2016 said that Brexit had made the economy worse off - and only one in five of them (20%) indicated that they would vote to stay out.

But if British voters might vote to rejoin the EU in another referendum, does this mean they are open to the prospect of changing the terms of the Brexit deal Boris Johnson made with the EU?

There is certainly plenty of evidence that, in principle at least, many would welcome a closer relationship. For example, YouGov have regularly asked whether people would support or oppose the UK joining the EU single market or its customs union. In April 2026, respondents backed the former by 48% to 26% and the latter by 50% to 22%. However, over one in four said 'don't know', suggesting that familiarity with the implications of these options is not widespread.

Seemingly even more popular is a closer relationship that does not involve joining either the single market or the customs union, a proposal supported by as many as 70% in May (though voters will not necessarily have a clear idea of what such a relationship looks like). However, only 26% said they 'strongly' supported this proposition, much less than the 36% who indicated they strongly favoured rejoining the EU. Much of the support for a halfway house is seemingly a tepid affair.

Certainly, when people are asked about specific proposals for changing the current relationship with the EU, much depends on how they are asked. Consider, for example, the government's proposal that the UK follow EU regulations on food and agricultural products so that foodstuffs being exported to the EU are no longer subject to checks at the border. BMG addressed this topic in January 2025 by asking:

> *To what extent do you support or oppose an UK-EU veterinary agreement to remove paperwork required on food and drink exports between both?*

51% said they were in favour, while just 13% were opposed - but around one in three did not express a view either way.

The response was a little less favourable when, in May this year, our polling with Ipsos asked:

Would you support, or oppose, if either, the UK government negotiating a deal with the EU that meant Britain was subject to EU law on plant and animal health, with little say in how rules were made, if it made trade in agricultural products easier? This might mean the UK signing up to EU rules on animal welfare standards or rules on the use of pesticides to make trade in meat, dairy and fresh produce easier.

Now just 38% were in favour, while 24% were opposed - but with again around one in three not choosing either option.

And it was even less favourable again when in January last year Redfield & Wilton asked:

Which of the following would be better for Britain?

The UK follows EU laws and regulations for food sold in Britain, and food made in Britain to be sold abroad DOES NOT go through border checks upon arrival in the EU

OR

the UK follows its own laws and regulations for food sold in Britain, and food made in Britain to be sold abroad DOES go through border checks upon arrival in the EU.

When posed in this way, rather more felt able to express a clear view, just 36% backed the UK aligning its regulations with those of the EU, while 45% were against.

Any proposal for 'resetting' Britain's post-Brexit relationship with the EU typically evinces much less in the way of a firm public reaction than the principle of being out of the EU. Consequently, how people respond to any particular proposal depends heavily on how it is put to them. If its reset strategy is to prove popular, the government might need to invest just as much in the arts of persuasion as it would in any attempt to reverse the Brexit decision.

THE POLITICS OF BREXIT IN THE UK

Brexit has had profound and lasting impacts on politics in the UK. The referendum impacted significantly on support for political parties as the public divided between 'Leavers' and 'Remainers'. These new identities split along Brexit-related lines rather than by class, which had previously been the driver of political contestation in the UK, to the point where, by the 2017 election, YouGov analyst (and subsequently Labour MP) Chris Curtis was able to assert that 'class would tell you little more about a person's voting intention than looking at their horoscope or reading their palms'.

Consequently, as the UK struggled to decide how to leave the European Union, Brexit came to dominate our politics and indeed our lives. Theresa May, having decisively shaped the UK's approach to leaving the EU by insisting that it would be outside the single market and customs union, ultimately failed to gain parliamentary approval for her deal.

Boris Johnson ultimately triumphed in the 2019 election partly on the basis that he was promising to 'get Brexit done' and put the country out of its misery. In the process, he undermined trust between the UK and EU, not least via his apparent willingness to break international law in his determination to secure a settlement for Northern Ireland that suited his political interests.

But just as the issue dominated everything between 2016 and that election, so too it featured remarkably little in political debate subsequently. There was the ongoing stand-off between the UK and EU over the workings of the Northern Ireland Protocol, which culminated in the signature of the Windsor Framework by Rishi Sunak. But Brexit as an issue of political contestation seemed to have become a thing of the past. Of course the pandemic focused attention elsewhere. But there also appeared to be an overwhelming sense of fatigue among the electorate. In April 2019, 72% of voters identified EU affairs as one of the top issues facing the country (the highest level on record), but concern slid dramatically after the agreement of the TCA in late 2020, falling below 10% in 2022 and reaching the lowest level in thirteen years (2%) in 2024.

The parties appeared alive to this. Even as businesses began to experience the practical implications of the decision to leave, what many observers described as a Brexit 'omertà' largely held. The staunchly pro-EU Liberal Democrats downplayed their policy of gradually moving closer to the EU with intention of eventually rejoining. Meanwhile the Labour Party signalled its cautious intentions by promising to 'improve our trade deal with the European Union' while sticking to all the core tenets of Boris Johnson's agreement.

Brexit was hardly mentioned during the election campaign of 2024. Labour's manifesto affirmed that it wanted to 'make Brexit work' and that 'Britain will stay outside of the EU'. And once elected, the Starmer government showed little inclination to reopen old wounds. While committed to a 'reset' of relations formally initiated at the inaugural post-Brexit UK-EU summit in May 2025, debate was kept to a minimum. The highly technical policy detail of the summit - new proposals on 'SPS', 'ETS' and the 'internally electricity market' - did not spark much public interest and discussion. And nor did the government want Parliament getting too involved: exemplified by the refusal to allow for a House of Commons committee to scrutinise EU policy and an insistence, under the terms of the Product Safety and Metrology Act, to allow the UK government to align with EU rules using secondary legislation (meaning virtually no scrutiny role for MPs).

A reset carried out without real parliamentary or public debate suited a government that was cognisant of the economic impact of leaving the EU, but anxious not to risk the ire of Brexit supporters within its voter coalition. Yet this approach did not long survive contact with reality. Since the turn of the year, the Prime Minister and Chancellor have become increasingly strident in their criticism of economic costs of Brexit and advocacy for closer EU relations.

What explains this shift? For one thing, the limits of the economic gains that even a successful conclusion to the 'reset' would imply led the government to set its sights on a more ambitious approach. For another, the second Trump Presidency and the attendant uncertainty and insecurity have strengthened the case for closer links with neighbours that largely share the UK's geopolitical interests. Public opinion polling also consistently indicates dissatisfaction with the Brexit status quo and support for a closer form of relationship with the EU.

The Labour Party has also increasingly come to see Brexit as a useful stick with which to beat its political opponents. This new approach had been apparent as early as the summer of 2025, when Nick Thomas-Symonds, in making the case for the 'reset', started speaking openly of the difficulties British firms had faced as a result of 'the first free trade agreement in history that made it harder to trade'. This line of argument was provided with further ballast following defeats in the Gorton and Denton by-election and the local and devolved elections of 2026, both of which underlined the potential utility of arguing in favour of closer economic and security ties with the EU in winning back the dissatisfied progressive voters who had abandoned the party in droves.

Finally, the prospect of a Labour leadership election - still in the balance as we go to press the week before the Makerfield by-election - has further catalysed the ongoing intra-Labour Party debate. Wes Streeting was quick to announce his desire to one day see the UK rejoin. While Andy Burnham has tried to stay well clear of Brexit during the by-election campaign, we can expect the pressure on candidates to display their pro-EU credentials to increase should a leadership contest be held. In parallel, the debate has started as to what should be included in the next Labour manifesto, with Labour MPs already happy to argue in private that rejoin should be an option, not least because of its potential to unite the progressive left.

At the same time, and relatively unnoticed, right wing parties are also hardening their positions. The Conservatives and Reform UK are both promising to tear up any agreements entered into by the Starmer government. Perhaps more significantly, both are also promising to take the UK out of the European Convention on Human Rights (ECHR), which would likely see the EU terminate or suspend the operation of the Trade and Cooperation Agreement. We seem to be inching back towards the Brexit polarisation we know so well from the period 2016-2019, with the two broad electoral blocs espousing very different futures for UK-EU relations.

THE POLITICS OF BREXIT IN THE EU

The outcome of the 2016 referendum took many in the EU by surprise. Shocked at first, member states quickly closed ranks. Within a week, EU leaders agreed that there would be 'no negotiations of any kind' with the UK until Article 50 had been triggered. This was to prevent the British side from attempting a strategy of 'divide and conquer' whilst giving the EU time to define its negotiating position. Leaders also made it clear that access to the single market required the acceptance of all 'four freedoms' (goods, services, capital and people) and that any future agreement would have to strike a balance between rights and obligations. This was to signal that the UK would not be allowed to pick and choose when it came to access to the single market.

This notion is not new. As early as 1987, the European Commission made it clear that any benefits enjoyed by the EFTA countries - Norway, Iceland, Liechtenstein and Switzerland - would have to be balanced with the corresponding financial and legal obligations. Brexit reinforced the view that a country outside the club could not enjoy the same benefits as a member. Not least, as European populist parties made increasingly eurosceptic pledges, the EU was determined to underline the value of membership lest more countries decide to follow in the UK's footsteps.

Ten years later, these principles still hold: the EU remains wary of offering the UK market access on conditions which could be interpreted as more lenient than those offered to other partners, let alone member states. In the autumn of 2024, in response to the Labour government's stated ambition to 'reset' the relationship, the EU organised a series of strategic discussions which _ the validity of the 2017 European Council guidelines, including the wish to have the UK as a close partner whilst being clear there can be no 'cherry picking'.

What has changed, however, is the level of attention being afforded to the UK. Back in 2016-2020, Brexit dominated one European Council summit after another. Today, relations with the UK no longer feature prominently on the EU's list of priorities. The war in Ukraine, relations with the US and China, and the competitiveness of the single market have long replaced Brexit at the top of their agenda.

None of which is to say that the EU is not interested in closer relations with the UK.

There is a recognition that times have changed since the TCA negotiations of 2020, and that the UK is an important partner in a more dangerous world.

The Commission's 2024-29 political guidelines make it clear that the EU wants to strengthen relations 'on issues of shared interest, such as energy, security, resilience and people-to-people contacts'. Conspicuously absent from this list is trade. More than five years into the application of the Trade and Cooperation Agreement, the Commission's most recent assessment maintains that it is a 'very good' agreement for the EU.

This matters more to some than others, as a function of geographical proximity and the importance accorded to bilateral relations. The German government, with its recently ratified British-German 'friendship treaty', has been an advocate of all-round closer relations. The Baltics and Nordics are interested in closer defence ties, and would have liked to see UK participation in SAFE. In other cases, it is more complicated. While Franco-British bilateral ties have gone from strength to strength in recent years, France has been fairly uncompromising when it comes to plugging the UK back into the EU. The French vision for a more self-reliant EU (often encapsulated in the phrase 'strategic autonomy') favours strengthening domestic industries (i.e. EU and, often, French) even if this means shutting out UK firms.

In other words, it is not just British red lines that are limiting the 'reset'. There are political, legal and institutional constraints on the EU side also. And these have implications beyond economic cooperation. The EU's Common Security and Defence Policy (CSDP) precludes any decision-making or planning role for third countries in CSDP missions and operations, imposes strict intellectual property rules in defence capability projects under the Permanent Structured Cooperation (PESCO), and largely limits input into defence industrial projects and supply chains to the EU, EEA countries and Ukraine.

The UK is not alone in wondering whether these limits undermine potential benefits to be had from participation, and two recent EU decisions have pushed the envelope in terms of allowing other countries to participate under certain conditions. Whilst previous EU defence industrial initiatives were mostly limited to single market members, SAFE allows procurement - of up to 35% of the value of a contract - from another country's defence industry under the condition that a Security and Defence Partnership has been signed first. Meanwhile, the Ukraine support loan will be open to purchases from third countries who either have a SAFE agreement or are 'providing significant financial and military support to Ukraine' and agree to share 'fair and proportionate financial contribution to the costs arising from borrowing'. This is a notable development but, if the aim is to build a common European defence market, more flexibility will be required.

The EU of today is a different organisation to the one the UK left. More deeply integrated in security and defence, more open to common borrowing (as evidenced during the pandemic), and increasingly shaped in the image of French preferences for

European autonomy. And further changes are afoot. Member states have just given the green light to start the drafting of Montenegro's accession treaty, a significant step towards the country's aim to join the EU by 2028. On top of this comes renewed interest in membership in the EU's nordic neighbourhood. Icelanders will be asked on 26 August whether the country should reopen negotiations on EU membership. A positive outcome could put this back on the political agenda in Norway too.

If the EU grows, it will likely have to be reformed, with the prospect of enlargement raising multiple institutional, policy, and financial dilemmas. Comprehensive reforms will be difficult to push through, but the EU might take incremental steps like a move away from the unanimity requirement in foreign policy. Moves towards closer integration might make the EU less appealing for a UK audience, but it is conceivable that other reforms might facilitate closer ties with the UK.

A more flexible form of relationship offering for Ukraine, devised to at least give the appearance of honouring pledges made, could open up some space for London. Meanwhile, some within the EU have suggested reforms that might ease participation by valued third country partners. Commissioner Andrius Kubilius recently revived the idea of a European Security Council. There are many shapes this could take, and its design (who is in, who is out), would be controversial, but it could be a way of allowing the UK to shape discussions, albeit without impacting on the decision-making autonomy of the EU.

There is also an open question about the future political direction of the EU project, with French presidential elections in April 2027, Polish parliamentary elections in November 2027, and German federal elections by early 2029. In France, the Rassemblement National is on track to reach the final run-off, and the Alternative für Deutschland and the Confederation of the Polish Crown are topping their respective polls. The paradox is that closer relations with the EU are seen as a distinctly 'progressive' project in the UK, whilst the organisation it wants to get closer to, or even rejoin, might come to be shaped by far-right governments.

All this to say that while the UK's political class is bickering over Brexit, the EU is not standing still. It might start to look quite different over the next five-to-ten years, and the UK, whether it stays on the EU's periphery, moves closer, or even rejoins, will have little say over the direction the EU is taking in its absence.

SECTION 3:
WHAT DOES THE FUTURE HOLD?

There is an increasingly stark divide between the government's analysis of the economic impacts of Brexit, and its proposed response. If it genuinely wants to unlock bigger economic gains from the EU, it is going to have to pursue a different model of relationship. This section considers the different potential options, ranging from the collapse of the TCA to an application to rejoin the EU.

In each case, we explain what the option looks like; what the likely impact would be for both the economy and security and defence cooperation; and the challenges the UK faces in pursuing such a relationship (in terms of voter attitudes, EU openness to the idea, and the practicalities of negotiation and implementation). Throughout, we draw on brand new polling which we commissioned with Ipsos and the KCL Policy Institute to try and better gauge public attitudes towards different types of EU relationship.

It is important to emphasise that the economic estimates in this section are only indicative. We have not undertaken any new modelling to forecast the potential GDP impact of different EU relationship models, and instead synthesised the best available evidence in relation to each. Not all sources agree with one another and they are, in some cases, close to a decade old (and so do not account for recent shifts in the global economy). This means we cannot be certain about the exact effect of, say, forming a customs union or joining the single market. However, we are able to form a sense of the relative economic benefits of different models, and contextualise this against the political and regulatory compromises required for each.

What emerges is an unambiguous trade-off between the ability to make your own rules and market access. As our 'UKICE staircase' (a more modern, improved version of the Barnier original) indicates, bigger economic gains are on offer if the UK is willing to accept, first, freedom of movement and, then, an ever wider degree of 'dynamic alignment' with EU law. The other clear lesson is that there is no 'easy' option for enhancing EU relations: any substantive shift in approach risks being a painful process for the government, both in terms of selling the agreement to voters and the effort required to negotiate with the EU and implement whatever is agreed.

Figure 1: The UKICE staircase

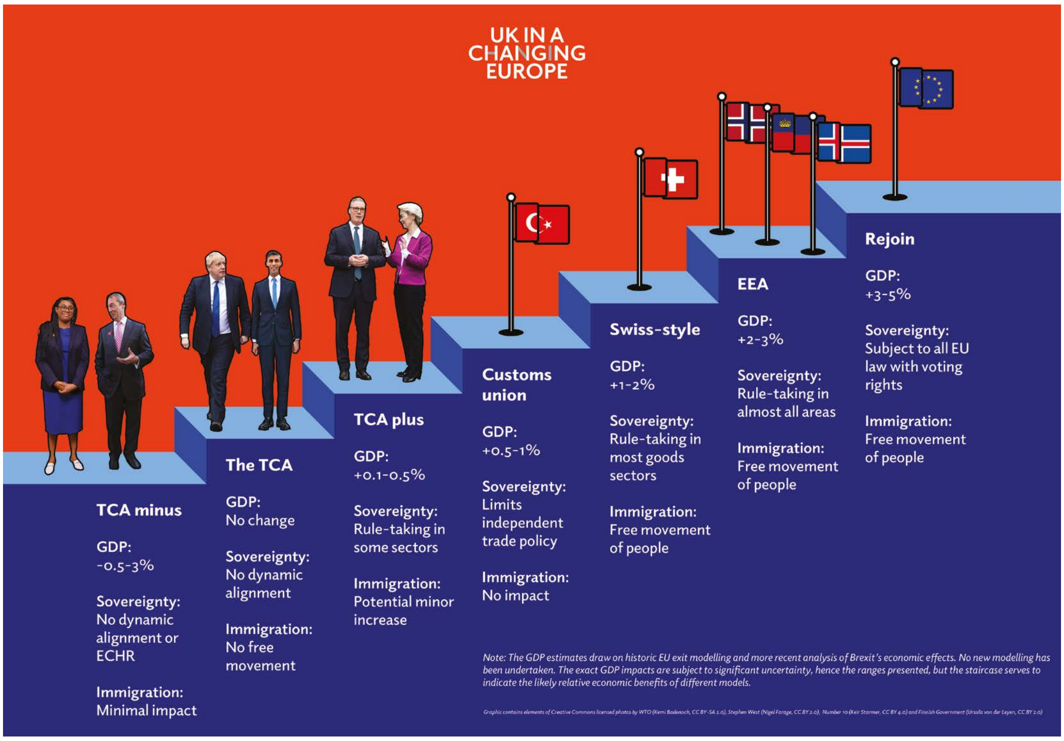


Figure 2: The future relationship matrix

	Economy & trade	Migration	Sovereignty	Northern Ireland	Security & defence	EU open to it?
TCA minus	GDP: -0.5%-3% New tariffs and non-tariff barriers	Minimal impact	No dynamic alignment or application of European Convention of Human Rights	Could require renegotiation of Good Friday Agreement	Unpicks Common Understanding commitments + could make informal cooperation harder	Cannot stop it, but would retaliate with trade measures and/or TCA suspension
TCA plus (Common Understanding)	GDP: +0.1-0.5% Some reduction in non-tariff barriers	Minimal impact: some potential increase from youth mobility scheme	Dynamic alignment on SPS, ETS, electricity + 'decision shaping' powers	Some reduction in GB-NI trade frictions but Windsor Framework still needed	Security and Defence Partnership + potential UK participation in SAFE	Yes
TCA plus (selective alignment)	GDP: +0.5-1% Some reduction in non-tariff barriers	Minimal impact: some potential increase from youth mobility scheme	Dynamic alignment on SPS, ETS, electricity + any other areas agreed to + 'decision shaping' powers	Further reduction in GB-NI trade frictions but Windsor Framework still needed	No additional effect compared to Common Understanding	Unlikely: if so, only in limited areas and in exchange for financial contributions
Customs union	GDP: +0.5-1% No more rules of origin paperwork or associated tariffs	No impact	Constrains UK trade policy + some potential regulatory harmonisation	Removal of customs-related barriers to GB-NI trade but Windsor Framework still needed	No additional effect compared to Common Understanding	Potentially: some officials have indicated openness
Swiss-style	GDP: +1-2% Significant reduction in non-tariff barriers	Free movement	Dynamic alignment on goods + 'decision shaping' powers	Significant reduction in GB-NI trade frictions but Windsor Framework still needed	No additional effect compared to Common Understanding	Potentially: but only if EU member states see it as in their own interests
EEA (single market)	GDP: +2-3% Removal of most non-tariff barriers	Free movement	Dynamic alignment with almost all EU law + 'decision shaping' powers	Significant reduction in GB-NI trade frictions but Windsor Framework still needed for customs	Full participation in SAFE and other defence industrial initiatives	Potentially: some member states have indicated support
Rejoin	GDP +3-5% Removal of all tariffs and non-tariff barriers	Free movement	Bound by EU treaties + full voting rights	Windsor Framework no longer needed	Back in the room and ability to shape CFSP and CSDP	Yes, but likely with commitment to join euro and no budget rebate

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TCA MINUS

What is it?

The policy of seeking to get closer to the European Union will not necessarily hold under future governments. Kemi Badenoch and Nigel Farage have both said that they would undo the agreements outlined in the Common Understanding, effectively taking the UK back to the original TCA as negotiated by Boris Johnson. Both have also said that they would leave the European Convention on Human Rights (ECHR). Doing so would likely be seen by the EU as a breach of an 'essential element' of the TCA, leading to its suspension wholly or in part. The Belfast/Good Friday Agreement would also have to be renegotiated, as it is underpinned by UK membership of the ECHR.

What would the economic impact be?

Repealing the Common Understanding (assuming it is implemented in full) would undo the economic gains it brings: of potentially up to half a percent increase in long-term GDP. It would create costs for businesses by reintroducing a range of checks and paperwork on agrifood trade, reducing the efficiency of electricity exchanges, and subjecting certain British exports to tariffs under the EU Carbon Border Adjustment Mechanism. It could also translate into higher food and energy prices for British consumers. Some reports suggest that the SPS agreement could include a 'termination clause' requiring the UK to pay a financial penalty should it exit the agreement.

Should the UK leave the ECHR and the EU subsequently suspend the entire TCA, the UK-EU trading relationship would in effect shift onto 'no deal' terms, meaning tariffs on goods trade. The UK would be suspended from EU programmes (like Horizon and Erasmus) and could also lose its data 'adequacy' decision, which reduces costs for services trade. During EU withdrawal negotiations, the government estimated that a no deal-type scenario would reduce UK GDP by 7-8% (compared to a 5% reduction under a TCA-type deal) and our own modelling estimated similar. In other words, that is a further reduction in GDP of about 3% compared to current arrangements. Given the rise in global tariffs since that analysis was produced, the negative impact of losing tariff-free access to the EU could be greater.

Is there any impact on migration?

The Conservatives and Reform argue that leaving the ECHR will enable the UK to 'secure our borders' and 'stop the boats', although they have not detailed how, beyond citing anecdotal evidence of migrants successfully appealing deportation decisions on human rights grounds. In reality, the ECHR does not dictate what a state's immigration policy should be, though in some exceptional cases individuals have successfully challenged deportation by appealing to aspects of the ECHR: such as Articles 3 and 8 which, respectively, prevent the deportation of individuals at serious risk of torture upon return, and those who have children entirely dependent upon them.

In practice, leaving the ECHR would likely have a minimal impact on net migration.European Court of Human Rights rulings against UK deportation and extradition decisions are exceptionally rare - occurring only 13 times since 1980. Between 2016 and 2021, an estimated 645 foreign national offenders successfully challenged their deportation by appealing to the Human Rights Act 1998 (which incorporates most of the ECHR into UK law) - equating to around 2.5% of total deportations over that period. A group of Conservative lawyers have argued that leaving the ECHR would make it harder for the UK to agree extraditions with other European countries, and to gain access to EU migration databases through which police forces share information. It would also make it harder to cooperate with EU member states on stopping small boat crossings.

Unwinding the Common Understanding would also lead to the suspension of any youth experience scheme. It is hard to say how significant that effect would be, as we do not yet know whether numbers will be capped under the scheme and how great uptake will be in either direction.

What would it mean for European security?

Unpicking the Common Understanding would likely lead to such a deterioration of relations that new formats for dialogue under the SDP would be either suspended or rendered meaningless. The exception might be Ukraine; an area where cooperation endured even at the height of tensions over the Northern Ireland Protocol Bill when EU officials were asked to restrict their contacts with the UK to 'legally mandatory' matters.

Leaving the ECHR would likely make the UK something of a pariah among other European states - the only other countries to have left are Russia, which did so in 2022, and Greece during its military junta (it has since returned) - likely rendering informal security cooperation, for example the formation of 'coalitions of the willing', more challenging. It would also necessitate a renegotiation of the 1998 Belfast/Good Friday Agreement - jeopardising political stability in Northern Ireland.

Political challenges

Leaving the ECHR is not popular with voters. YouGov polling from last year found that 46% of the public want to remain a part of it while 29% want to withdraw - though a larger proportion of Conservative (44%) and Reform (72%)

voters favour withdrawal. That said, many voters appear quite optimistic about the potential implications: only a quarter think it would have a negative impact on the UK economy or peace and stability in Northern Ireland, while the same proportion think it would have a 'major positive impact' on the number of migrant deportations.

The EU would not welcome UK withdrawal from the ECHR: both because it is a core commitment of the TCA but also because it signals UK retrenchment from the rules-based international order, and could encourage populist leaders in EU member states to try and follow suit. As well as leading to a partial or complete suspension of the TCA, UK ECHR withdrawal would also engender a significant cooling of wider relations with the EU, limiting opportunities for cooperation in other areas.

The process

The UK would have to formally notify the Council of Europe of its intention to withdraw from the ECHR, giving six months' notice. This would, most likely, first require the UK government to pass an Act of Parliament for that purpose. It could in theory use its prerogative powers (exercised without parliamentary consent) over foreign affairs to submit its notice to the Council of Europe, but this would run contra to the legal precedents set by Brexit. These have established that the government cannot use its prerogative powers over foreign affairs to change domestic law or to 'frustrate the purpose of any statute, suspend its operation, or remove statutory rights'.

The UK would in all probability have to leave the Council of Europe if it withdrew from the ECHR, as the ECHR is a Council of Europe treaty and adherence to it is a condition of membership.

THE COMMON UNDERSTANDING

What is it?

This approach focuses on delivering the commitments made in last year's UK-EU 'Common Understanding', while maintaining the TCA and Withdrawal Agreement as the core pillars of the relationship. It would not seek to deepen economic cooperation through any further sectoral alignment with the EU market, but it could entail some looser forms of additional cooperation. It is worth noting that any UK ambitions to pursue deeper economic integration with the EU (as per the other models discussed) would rest on the Common Understanding first being properly implemented.

In terms of delivering the Common Understanding, a first task is to finalise the negotiations which are closest to completion (on SPS, emissions trading and youth experience), before implementing and operationalising what is agreed to. In addition, negotiations will need to continue on other files which are far less advanced (e.g. the UK's participation in the internal electricity market) and the two sides could look to restart discussions on UK participation in SAFE.

The UK and EU will also need to deal with deadlines built into the TCA and associated treaties - such as the TCA review (scheduled for this year) and changes to rules of origin requirements for electric vehicles which take effect from January 2027. The UK's participation in EU programmes (Erasmus+, Horizon) will need to be renegotiated for 2028 onwards and the two sides could look to enhance cooperation through new, pragmatic measures - for example a 'resilience partnership' and UK access to EU schemes like the Scaleup Europe Fund for tech or 'Made in Europe' vehicle subsidies - which do not require formal regulatory alignment or treaty-based cooperation.

What would the economic impact be?

Any macroeconomic benefits will be marginal, with the best available evidence suggesting that the Common Understanding will, at most, boost long-term GDP by half a percent. The government's own estimate is that the SPS and emissions trading deals could add £9bn to the UK economy by 2040, which equates to a 0.3% boost to GDP over 15 years. The economist John Springford estimates that the gains will be closer to 0.1% over a decade, but that a youth mobility agreement could give a bigger boost (0.45% over a decade) due to the rise in net immigration (though that depends on whether and where numbers are capped under any scheme).

Energy UK reports that the UK's exit from the internal electricity market is costing £120-370 million a year, implying that the electricity agreement might add around £3bn to UK GDP by 2040 (so another 0.1% boost). It could lead to further gains down the line by enabling the UK and EU to upscale shared offshore renewable energy capacity - which would help to bring down energy costs and create further benefits around energy resilience and security of supply.

However, the UK is expected to 'pay to play': EU member states have stipulated that the UK should pay into EU 'cohesion funds' as part of any agreement on the internal electricity market. The UK will also pay around £570m to participate in Erasmus+ for 2027/28, and historically it has received less back than it puts in, due to more EU students coming to the UK than vice-versa. Future participation is subject to negotiation between the UK and EU, but the annual cost of participation will likely rise, given that the Commission has proposed a 50% increase in Erasmus funding for the 2028-34 EU budget cycle. Horizon Europe provides €96bn in funding for scientific research programmes, and there are also 'correction mechanisms' to ensure that UK contributions are not significantly higher or lower than the grants its researchers receive.

How much influence would the UK have?

The SPS, electricity and ETS deals would require the UK to 'dynamically align' with EU law. That means adopting all EU law agreed to be necessary for the functioning of the given agreement, and adopting relevant new and updated pieces of EU legislation over time.

The UK would be given 'decision-shaping' powers over the EU law to which it dynamically aligns. These are likely to be very similar to the powers which Switzerland has as part of its package of agreements with the EU. That means the right to be consulted in the very early stages of the legislative process if the matter at hand concerns the UK, but no voting rights over the legislation. The Commission would consult with UK 'experts' (typically civil servants or non-governmental specialists) during the preparatory phase of a legislative act. Effective influence here will require the UK to get ahead of upcoming EU policy proposals and identify the best experts to send in advance.

There would be some further consultation in the period between a proposal being submitted to the other EU institutions and its adoption. UK experts would also likely be allowed to participate in the 'comitology' phase, when discussions are held on 'implementing acts' which are sometimes necessary to ensure the consistent implementation of EU law across countries. They would be able to participate in discussions and gain access to information on adoption processes, but would again have no voting rights over the implementing acts.

Is there any impact on migration?

This approach would not see a return to free movement of people with the EU but the youth experience scheme could impact net migration figures. This will depend on the number of UK and EU nationals who participate, though it is likely that more EU nationals would be interested in coming to the UK than vice-versa, given the attractiveness of the UK (especially London) as a destination. UK negotiators have been pushing for a cap on overall participant numbers, while the EU insists there should be no limit. The UK's other youth mobility schemes are capped, with, for instance, 42,000 visas available to Australians in 2025/26 – though the EU's population is around 16 times bigger than Australia's and, of course, much closer to the UK.

The UK received just under 30,000 higher education students under the 2018 Erasmus call, while just over 18,000 UK students took up placements abroad. Because Erasmus placements last for under a year, they do not count towards net migration figures.

What would it mean for European security?

The UK-EU Security and Defence Partnership has led to the establishment of some regular, high-level dialogues, but the real impact will depend on whether the two sides can build sufficient confidence and trust to prepare the ground for practical actions: such as UK participation in SAFE, the Ukraine loan scheme or UK association to the European Defence Agency.

Political challenges

For the UK, this minimalist approach offers the path of least resistance when dealing with Brussels, as it entails working on files on which the EU has already agreed to engage. Negotiations will, nevertheless, not be straightforward – as the protracted disagreements over the youth experience scheme evidence. The EU is likely to refuse to sign off on the UK's key strategic interests (i.e. the SPS deal) until it secures its own (i.e. youth experience).

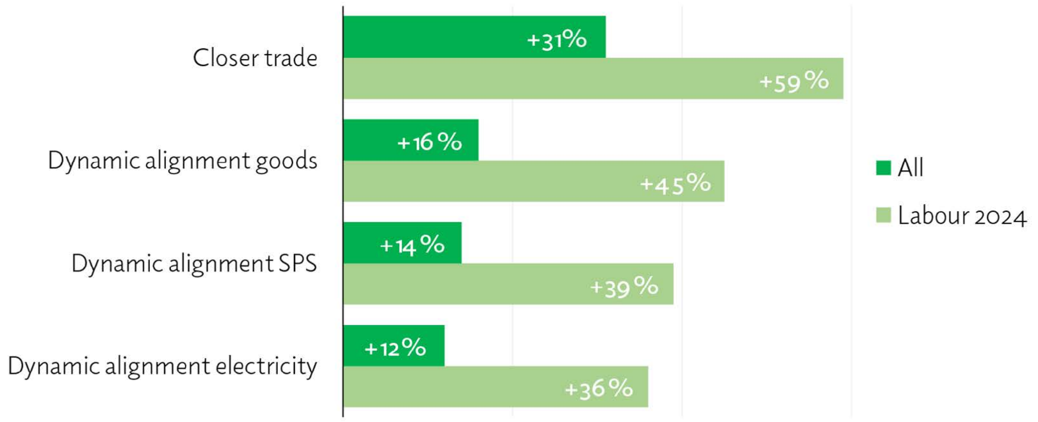
The government may also see this approach as the safest bet when it comes to domestic politics. Sticking with the Common Understanding leaves Labour's red lines intact and is unlikely to kick off any major new political arguments – even if the Conservatives and Reform have both said they will reverse any new agreements with the EU, and could launch attacks if and when the government starts implementing dynamic alignment with EU law using powers under the European Partnership Bill.

Polling by Best for Britain also shows that 'Britain having a closer relationship with the European Union, without rejoining the European Union, the Single Market, or the Customs Union' is the most popular of all future relationship options. But it is questionable whether voters in fact perceive that to mean the quite meagre measures currently under negotiation. They may be envisaging a form of über-'cakeism', where the UK gets all the privileges of EU market access with none of the obligations. Indeed, our recent polling finds that voters appear quite ambivalent about individual dynamic alignment agreements, when they are spelled out in detail. Net support for a closer economic relationship with the EU is around twice as high as for the SPS and electricity deals, and for a hypothetical agreement on goods.

Voters are not especially enthused by the EU reset deals which the government is negotiating

Net support for a closer overall trading relationship with the EU, and for particular types of new trading agreement with the EU.

UK IN A CHANGING EUROPE



Source: Ipsos polling for UK in a Changing Europe and the Policy Institute. 2026 base: 2,245 GB adults aged 18+, 15-20 May. 2026

Moreover, the majority of voters who are defecting from Labour are turning to parties of the liberal-left which advocate a closer relationship with the EU. Sticking with the Common Understanding is unlikely to help the party in winning them back.

The process

If and when the agreements on dynamic alignment are finalised, the UK will have to implement the relevant EU legislation and maintain alignment with new and updated pieces of EU law in future. This could prove a major task. The fact that the UK has taken barely any action to voluntarily replicate EU product rules - despite stating its intention to do so and passing an Act for the express purpose - speaks to the administrative difficulty of aligning with EU law on even a minor scale. Dynamic alignment will be a much greater job still: the SPS deal, for instance, will require the UK to adopt at least 76 items of EU law through domestic legislative processes - putting major demands on the officials in Whitehall and the devolved administrations. And, if the UK fails to maintain alignment, it risks reprisals from the Commission.

Dynamic alignment also raises democratic and constitutional issues. The majority of legislation is likely to be adopted using statutory instruments (SIs), which makes the process faster but means MPs have little opportunity for scrutiny. MPs cannot amend SIs and, though they can reject them, in practice this almost never happens and is extremely unlikely given the size of the government's majority. In future, however, there is a possibility that a less pro-EU Parliament could block alignment legislation.

There are major questions around the role of the devolved governments: both in terms of whether they will have the powers to implement alignment legislation themselves in their areas of competence (like SPS); and whether there will be any scope for Wales and Scotland to take a different approach to Westminster in aligning with EU law (for instance either by refusing to implement a specific piece of EU legislation which Westminster adopts, or by adopting a piece of EU law which Westminster refuses).

There could also be future disputes between the UK and EU over whether a new/updated piece of EU law is relevant to the UK and/or the UK thinks it should have an exemption from dynamic alignment (for example if a law change would pose a threat to the livelihoods of certain UK farmers). Issues could also arise if the UK is seen by Brussels to be adopting new legislation incorrectly or too slowly. Dispute resolution mechanisms will be built into any UK-EU agreements to deal with this, based on an independent arbitration panel with the Court of Justice of the European Union acting as the final authority on matters of interpretation of EU law. Non-compliance by one side with an arbitration panel ruling would allow the other to take retaliatory measures.

SELECTIVE ALIGNMENT

What is it?

Selective alignment involves the UK and EU agreeing to UK dynamic alignment with EU law in sectors beyond those currently under discussion. This is, in effect, the objective of the UK government. The Prime Minister's ambition is that the next UK-EU summit will "not just ratify existing commitments" but deliver new agreements, and he has stated his support for closer "alignment" with single market rules. The Chancellor has gone further in arguing that "alignment should be the default position unless there are reasons not to". She has separately stated that this could be either "negotiated" (i.e. dynamic alignment) or "unilateral" (where the UK voluntarily keeps pace with EU regulations in a given area, without any compulsion from the EU).

It is not clear which sectors the government might prioritise for dynamic alignment. Some potential candidates include goods, vehicles, chemicals or pharmaceuticals. It is hardly surprising that British politicians favour this approach, as it represents the best way of gaining market access while respecting the letter of its red lines of no single market or free movement – but the EU is not keen on a sector-by-sector approach. It was reported in May of this year that the UK had pitched the idea of a 'single market for goods' to the EU – implying dynamic alignment with all EU goods legislation – but that the Commission dismissed it, suggesting that the UK seek a customs union or EEA membership instead. That being said, there is nothing to stop the UK unilaterally replicating EU rules in any area it wishes to.

What would the economic impact be?

In theory, selective alignment in some key sectors could be extremely positive for the industries concerned. However, because the EU is unlikely to offer the UK many more sectoral alignment deals – if any – this approach would deliver only fractional economic gains beyond those implied by the Common Understanding, though the benefits might be more significant for the sectors covered.

EU member states have made clear that UK contributions into EU 'cohesion funds' will be a necessary price for 'any further agreement affording the UK access to the Union's internal market'. Recent reporting in the Times states that the EU is asking for UK contributions of around £1bn a year in return for further single market alignment. Switzerland, whose economy is around four times smaller than the UK's, pays €375m a year (roughly £325m/year at current exchange rates) as part of its agreement with the EU.

The UK has far more freedom to unilaterally align with aspects of EU law, but the gains from this are even more marginal. Voluntarily aligning with single market rules does not grant privileged access to it. UK exporters would still be subject to all the additional checks and paperwork which Brexit created. All it does is avoid new 'passive divergence' (where EU rules change over time away from the UK rulebook) which can add additional complexities to trade. This is because businesses end up having to meet different regulatory requirements depending on whether they are serving the GB or EU/N markets - adding time and cost to trade.

How much influence would the UK have?

As per the 'Common Understanding' model, the UK would have only limited 'decision-shaping' powers in relation to any additional EU law with which it dynamically aligns.

Is there any impact on migration?

Unilateral alignment with EU law would not have any discernible impact on migration. Nor, in principle, would selective dynamic alignment - given all of the policy areas in question (both those under negotiation and hypothetical future agreements) focus on the free movement of goods. In practice, it is highly unlikely that the EU would allow the UK to cherry pick the free circulation of goods without the free movement of people - which would move the UK towards a 'Swiss-style' position.

What would it mean for European security?

Further selective alignment would not have a direct impact on foreign, security and defence cooperation (though alignment on goods regulations might enable more integrated defence supply chains). The two sides would continue to rely on the SDP for formalised strategic dialogue, whilst working closely together to support Ukraine.

Political challenges

Selective dynamic alignment is seemingly popular with voters. As noted in the previous section, 'Britain having a closer relationship with the EU, without rejoining the EU, the Single Market, or the Customs Union' is the most popular of all future relationship options: precisely because it means getting the most popular bits of EU membership (economic integration) without most of the awkward parts (free movement, major financial contributions).

But, for the same reasons that selective alignment appeals to the UK, there is little appetite for it in the EU. The Commission will not allow a third country, and less still one which left the bloc, to 'cherry pick' its access to the single market.

There are populists aplenty within the bloc whom the Commission is keen to remind that membership implies obligations as well as benefits. The Commission is also mindful of Switzerland, which is in the process of approving its updated agreement with the EU. Were the UK seen to be getting similar levels of single market access to Switzerland, but without the same obligations, it might lead the Swiss to reject the updated agreement and call for 'UK-style' terms of association.

The process

Further dynamic alignment would also mean more work for Whitehall and the devolved governments in terms of adopting the relevant EU acquis and maintaining alignment over time. Under voluntary alignment, the Commission would not formally notify the UK of changes to its law - making it a much harder process to manage. The very limited use of the Product Regulation and Metrology Act (which enables unilateral alignment with EU product safety rules) suggests that the UK lacks the capacity (or appetite) to maintain anything close to systematic voluntary alignment with EU rules in even a single sector.

CUSTOMS UNION

What is it?

The UK cannot be part of the EU customs union without rejoining the EU, but it could seek to form a customs union. This would see the UK and EU charge the same tariffs on imported goods in some or all sectors (the scope would be subject to negotiation). That would limit the UK's ability to run an independent trade policy, as it would not be able to offer other countries lower tariffs than the EU's. And if the EU imposed major tariffs on, say, the US or China, the UK would have to do likewise.

But, due to setting common import tariffs, goods traded within the UK-EU customs union would always be tariff-free and no longer have to prove their national origin - because it would be guaranteed that, for instance, an imported Chinese electric vehicle had already paid the tariff rate necessary for circulation in both the UK and the EU. This would remove a significant source of trade friction under the TCA, where traders must complete complex 'rules of origin' paperwork to prove that a sufficient proportion of a good originates from the UK/EU, in order to qualify for tariff-free trade.

What would the economic impact be?

2018 government analysis estimated that leaving the customs union would reduce long-run GDP by about 1%, implying that joining one could reverse most or all of that loss. Against that, the UK would have to unwind or revise the free trade agreements (FTAs) it has signed post-Brexit, which are estimated to add around half a percent per year to UK GDP over the next two decades. So a very rough calculation is that the long-term net benefit of a customs union might be a 0.5% boost to GDP, or £15bn a year; though the benefits might be slightly greater because the EU has concluded FTAs with many of same countries as the UK post-Brexit (thus requiring less drastic revisions to the UK's FTAs). The pre-Brexit analysis will not have factored in the recent rise in global protectionism, such as the 50% steel tariff import rates imposed by the US, UK and EU. Around 80% of UK steel exports go to the EU, and these would be exempted from tariffs under a customs union (if it covered steel).

The economic gains could also be greater if a customs union entailed additional regulatory alignment. Turkey, for example, has a customs union covering manufactured goods and processed agricultural products, under which it has harmonised much of its technical goods regulation with the EU and secured mutual recognition on conformity assessments, removing most additional checks for industrial goods. It discussed extensions to cover services and procurement but talks were suspended in 2002. Theresa May's 2018 'single EU-UK customs territory', meanwhile, would have seen the UK follow EU trade defence policies. A customs union would also reduce trade friction between Great Britain and Northern Ireland, as there would no longer be any requirement to ensure goods have paid the correct tariff before crossing the Irish Sea.

The biggest winners would be manufacturing industries with complex supply chains, which have struggled most to navigate TCA rules of origin processes. Research by the UK Trade Policy Observatory found that, in 2022, while well over 90% of UK animal and vegetable exports to the EU proved their compliance with rules of origin, only 68% of transport equipment and 61% of machinery and electrical equipment exports were able to do the same – meaning around one third of EU exports in those sectors faced tariffs.

How much influence would the UK have?

As noted above, the UK's ability to maintain an independent trade policy would be significantly diminished (at best, it would be able to replicate the tariff rates which the EU has agreed with third countries under its own FTAs) while, in theory, it could also entail alignment with other areas of EU law such as goods regulations or trade defence measures.

The UK would also likely want to avoid ending up in the same position as Turkey, which, under its customs union with the EU, suffers from 'asymmetrical access': countries which have signed an FTA with the EU get preferential access to the Turkish market, but Turkey does not benefit from preferential access to their market in return. This makes it harder for Turkey to secure its own FTAs with those countries, because they already have preferential access to the Turkish market. One way to avoid this would be an agreement that the UK could jointly negotiate FTAs with the EU (or do so in parallel) as part of a customs union.

Is there any impact on migration?

Not in principle, although the EU could theoretically ask for free movement as a price for agreeing a customs union.

What would it mean for European security?

A customs union could in theory be beneficial to joint UK-EU efforts to develop shared defence industrial capacity, as the lack of rules of origin requirements would reduce manufacturers' administrative costs (and risk of tariff exposure) when using joint UK-EU supply chains.

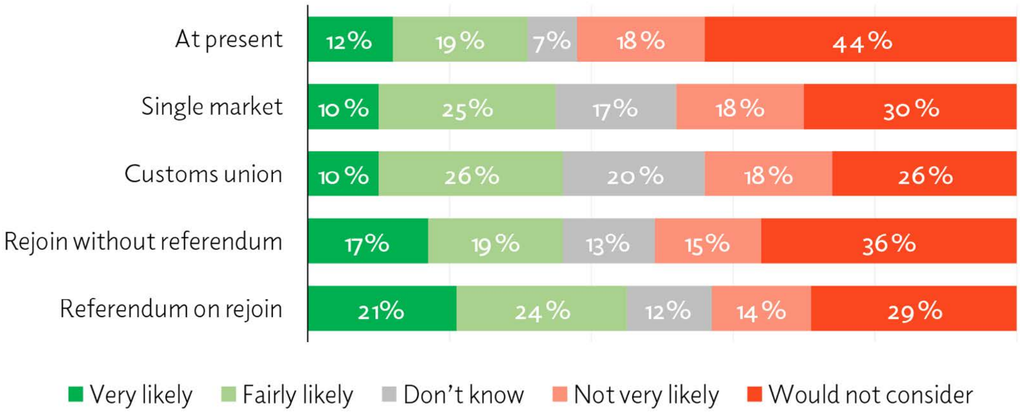
Political challenges

Opinion polling by Best for Britain shows that around half of voters would be in favour of 'rejoining the Customs Union', while around a fifth are opposed. Yet, aside from the fact that 'rejoining the Customs Union' is not a viable option (it would have to be a customs union), it is questionable whether respondents understand the trade-offs involved; it is at least plausible that 'customs union' is simply a handy way to express a desire for closer links with the EU. Indeed, the level of support for 'rejoining the Single Market' is near-identical, with both options polling better than the relationship remaining the same, but less well than rejoining the EU.

Our own polling corroborates this trend. When respondents were asked how likely they would be to vote for Labour based on different EU policy positions, the responses for the customs union and single market were almost exactly the same. Again, both policies were - marginally - more popular with voters than the status quo, but less popular than committing to a referendum on rejoining the EU.

Labour might find it easier to sell a second referendum than 'halfway house' options for EU relations

How likely would you be to consider voting for the Labour Party if they promised the following in their manifesto at the next General Election?



Source: Ipsos polling for UK in a Changing Europe and the Policy Institute. 2026 base: 2,245 GB adults aged 18+, 15-20 May.

Both the Green Party and Liberal Dempcrats are in favour of the/a customs union. The government might think that committing to a customs union could neutralise those parties' advantage with progressive voters on the EU issue. But there is a high likelihood that the Greens and Lib Dems would respond by switching their policy to ensure they continue to outflank the government (the Green Party already supports a return to free movement) - especially as rejoin appears a more popular option than 'halfway houses' like the customs union or single market.

The European Commissioner for Economy and Productivity, Vadis Dombrowskis, said in February this year that the EU is "open-minded" and "ready to engage" about the idea of a customs union. The EU is likely to be more amenable to UK proposals for closer ties which have a clear structure and precedent, such as a customs union, rather than 'bespoke' models which the UK seeks to tailor to its own best interests.

The process

Agreeing a customs union would require comprehensive negotiation to determine its scope, governance, and address any other associated issues such as potential UK regulatory alignment, questions of asymmetrical access, the sharing of customs revenues and the potential use of anti-dumping measures. Any regulatory alignment would, in turn, require additional UK efforts to implement the necessary legislation and maintain alignment over time.

Sinan Ülgen, Senior Fellow at Carnegie Europe, notes that the EU-Turkey customs union was committed to at a time when political dialogue was suspended, "with the hope of creating an anchor for an endangered relationship". This helped with "rejuvenating the European agenda in Turkey" and led to the EU granting Turkey accession status in 1999. Yet progress has, for wider political reasons, halted since then, and the customs union can be a point of irritation, with Turkey raising repeated complaints about trade asymmetry and a lack of influence over EU rules, while the EU has concerns about noncompliance by Turkey.

SWISS MODEL

What is it?

Switzerland enjoys partial access to the single market, including for industrial goods, agriculture and food safety, electricity, air and land transport. It also participates in the Dublin asylum system and the border-free Schengen zone and cooperates with the EU in numerous other areas. This is the result of many years of negotiations and over one hundred bilateral agreements, rather than being a 'model' by design.

Over the years, this led to a highly complex, and from the EU's perspective, 'inconsistent' arrangement. In particular, the EU felt it lacked the tools to ensure that Switzerland would keep up-to-date with changes in EU law and the mechanisms for enforcement and dispute settlement. The latest package, negotiated in 2025, addresses these grievances. First and foremost, if EU law changes in an area that affects Switzerland, this is integrated in the EU-Swiss agreement via a decision by the relevant joint committee (for example, the Joint Committee on Food Safety or the Joint Committee on Air Transport).

The package also introduces a dispute resolution mechanism that uses an independent arbitration panel, with the European Court of Justice as the ultimate arbiter in matters of the interpretation of EU law.

In addition, a new permanent mechanism replaces the ad-hoc system for setting Swiss financial contributions to reduce social and economic disparities in the EU. For the period 2030-2036, Switzerland will pay CHF 350m annually (around £330m at current exchange rates). Afterwards, this can be adjusted to inflation and increased or reduced by 10% if the relationship develops further. Rather than flowing into the EU budget, the funds will be used for jointly agreed bilateral programmes. In the past this has included a Swiss-Polish programme to support joint research, a vocational education programme in Bulgaria and environmental programmes in Czechia.

What would the economic impact be?

There is no modelling of what a Swiss-style deal would mean for the UK economy. However, the economic benefits are likely to be less than an EEA-style deal, as the UK would have only partial access to the single market, but more than the customs union - which does not entail any regulatory alignment with the single market. That implies a long-term GDP gain of around 1-2%, with the biggest gains being in relation to manufactured goods trade and labour mobility. Frontier Economics modelled the effects of deep regulatory alignment in goods and a more piecemeal approach on services, which would be similar in nature to the Swiss deal. They estimate a long term GDP boost of 1-1.5%.

How much influence would the UK have?

The Swiss-EU 2025 package introduces formal 'decision shaping' powers which can deliver influence to a certain extent during specific phases of the legislative process. Crucially, Switzerland does not get a vote.

The Commission consults Swiss experts during the preparatory phase of a legislative act in the same way that it does with experts from member states. Switzerland can also request a preliminary exchange of views in the relevant joint committee, which can involve a 'a continuous process of information and consultation' in the phase preceding the adoption of the legal act by the EU. In addition, the joint committee can make 'technical adaptations' to legal acts during their integration into the agreement, for example, to adapt them to Swiss specificities.

Compared to Norway (which is in the European Economic Area), Switzerland maintains regulatory autonomy in sectors such as AI and financial services.

Is there any impact on migration?

Yes. Switzerland accepts the free movement of people. This means EU nationals and their family members can live, work and study in Switzerland and vice versa. Switzerland also applies future EU law in this area, for example, if a new country joins the EU.

Switzerland has secured a few exceptions and safeguards, including the right to trigger a safeguarding clause 'in the event of serious economic or social problems' arising from free movement. In the first instance, this leads to a discussion in the Joint Committee of the Agreement on the Free Movement of Persons rather than an emergency brake. If no agreement is reached, the matter goes to an arbitration tribunal. Even if the tribunal does not rule in Switzerland's favour, it can take protective measures, like the introduction of temporary caps, or employment preferences for local residents. The EU can respond by initiating dispute settlement and taking rebalancing measures in the internal market agreements (with the exception of agriculture).

What would it mean for European security?

A Swiss-like arrangement for the UK would have little impact on European security. Switzerland has a long history of neutrality; it is not a member of NATO and the country's military non-alignment has deep roots. Switzerland is not taking part in the EU's efforts to strengthen its defence industrial base. While this is primarily a function of Swiss neutrality, the EU's current rules would, in any case, offer limited plug-in opportunities for a country outside the European Economic Area. This means pursuing a Swiss-like relationship would not, per se, open the way for more cooperation on defence.

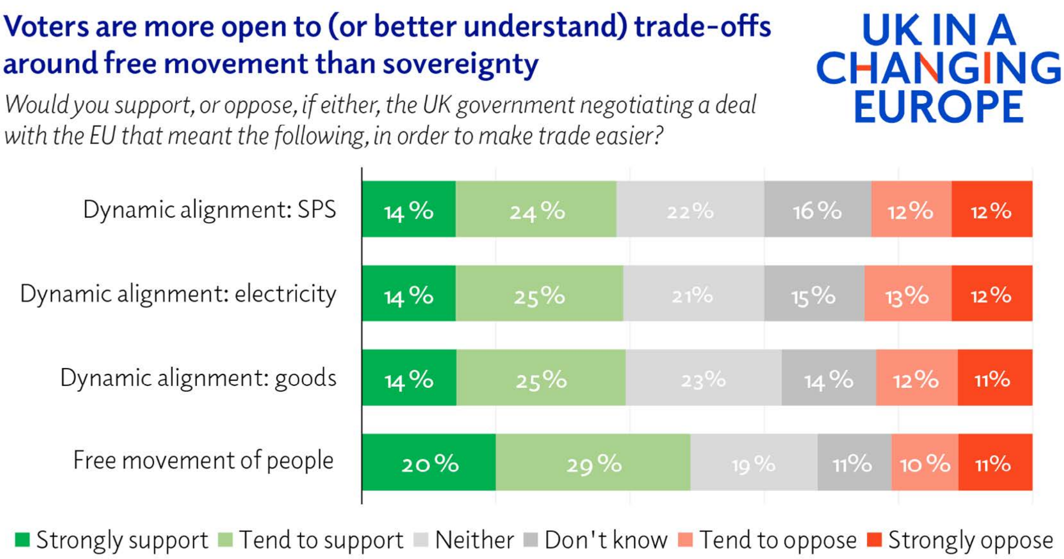
Political challenges

The latest EU-Swiss package makes it clear that partial access to the single market comes with clearly defined obligations. First and foremost, this includes the free movement of people, regular financial contributions, and the dynamic adoption of EU law.

There is currently no political party in the UK calling for a Swiss-style agreement. It is, however, the preferred model for parts of the Labour Party, who are willing to drop the red line on the free movement of people in exchange for better market access. While free movement is often assumed to be politically unpalatable, our new polling finds that voters are in fact more supportive of compromises around free movement than around sovereignty. That said, it is important to note the large proportion of people who answered 'neither' or 'don't know': suggesting that many lack a clear interest in or understanding of the detail around quite technical policy trade-offs.

Voters are more open to (or better understand) trade-offs around free movement than sovereignty

Would you support, or oppose, if either, the UK government negotiating a deal with the EU that meant the following, in order to make trade easier?



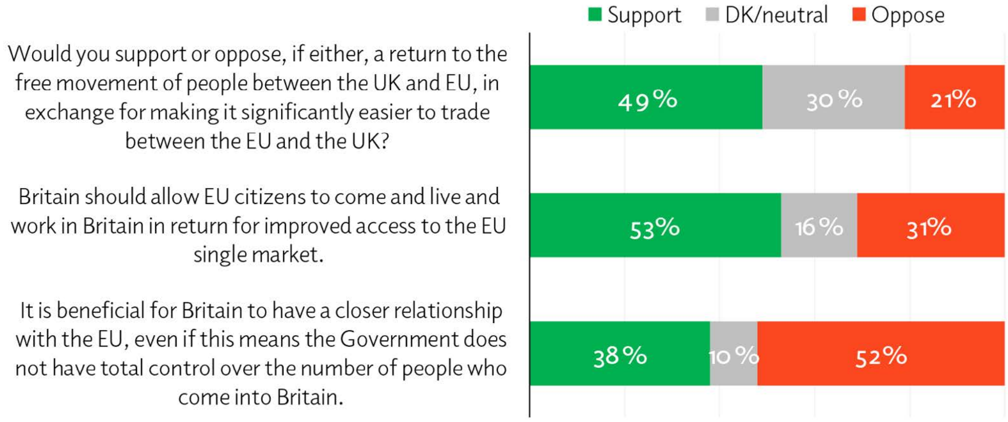
Source: Ipsos polling for UK in a Changing Europe and the Policy Institute. 2026 base: 2,245 GB adults aged 18+, 15-20 May.
The exact wording of the trade-off questions can be found on the UK in a Changing Europe website here.

Indeed, much seems to depend on how information is presented to voters. Recent polling by Best for Britain finds strong public support for reintroducing freedom of movement in principle. However, support drops below 50% as soon as it is framed as increasing migration to the UK. Previous surveys also paint a nuanced picture: while the public is supportive of EU citizens living, working and doing business in the UK, there is significant opposition to the right to access welfare resources. Our recent polling asked about free movement trade-offs in three different ways, producing contrasting results.

Attitudes towards EU free movement vary considerably depending on how the question is posed

Three differently expressed questions on the trade-off between free movement of people with the EU and EU market access.

UK IN A CHANGING EUROPE



Source: Ipsos polling for UK in a Changing Europe and the Policy Institute. 2026 base: 2,245 GB adults aged 18+, 15-20 May 2026.

The other unknown is the EU's position. Brussels' dislike for the Swiss patchwork of deals is well documented. Many of these grievances have been addressed by the introduction of new institutional elements in the 2025 package approach, but, nevertheless, the arrangement remains complex and was never designed to be emulated by others. Moreover, member states must all agree, including those who might stand to lose out economically if the UK were to gain this degree of single market access.

Crucially, the new Swiss package is yet to be ratified. In Switzerland this requires a referendum, likely in 2027; the outcome of which will decide whether there is indeed a 'model' to speak of.

The Commissioner with responsibility for the UK, Maroš Šefčovič, told the EU-UK Parliamentary Partnership Assembly: "Switzerland, of course, it's possible, but it takes time". Member states may not all share this sentiment, and will think long and hard about whether it is in their interest to let a big economy like the UK access the single market for goods only. Overall, it is far from certain that the EU would entertain this type of deal for the UK, and probably not until it has been ratified by the Swiss.

The process

Negotiating a Swiss-style deal would likely take several years. First, the two sides would have to agree on the parameters of their arrangement, for example, the internal market sectors that would be covered, what other areas of cooperation should be included, and the institutional elements. The European Commission would then propose a negotiating mandate to the Council which member states would have to unanimously agree.

Given that it took six months from the first UK-EU summit to formally open negotiations on the SPS deal and linking emissions trading schemes - which was seen as a quick turnaround by officials in Brussels - the mandate-setting process for a Swiss-style deal would take just as long, if not longer. This would then be followed by complex negotiations, including on the UK's financial contribution, exemptions from dynamic alignment, and safeguards for the free movement of people.

Once negotiations are concluded, implementing, maintaining and updating the deal would be just as time and resource intensive. As the Swiss Ambassador to the UK put it, "being outside of the EU is a painful process most of the time because you will be consumed every day by how you want to manage your relations with the EU. That is our experience."

The reality of any model shy of membership is that the UK would find itself in a near constant bargaining and negotiating process with the EU.

EEA (SINGLE MARKET)

What is it?

Rejoining the single market without rejoining the EU would mean seeking to join the European Economic Area (EEA). The EEA comprises the EU member states plus three European Free Trade Association (EFTA) states: Iceland, Liechtenstein and Norway (Switzerland is also an EFTA state but not in the EEA).

The three EEA/EFTA states are not EU members, but are guaranteed 'equal rights and obligations within the Internal Market': meaning that they dynamically align to all EU legislation necessary to benefit from the single market's 'four freedoms' - the free movement of goods, services, persons and capital. They also adhere to EU law on competition and state aid, consumer protection, company law, environment, social policy and statistics. Unlike EU member states, EEA/EFTA states have no voting rights over the EU legislation to which they are subject.

There are 'flanking' areas of cooperation, without dynamic legislative alignment, in areas including research and development, education, training, employment, civil protection, tourism and culture. There is no regulatory alignment on agriculture, fisheries, foreign and security policy, justice and home affairs or monetary union. There is also no customs union between the EU and the EEA - meaning these countries can pursue independent trade policies (constrained by the need to adhere to EU regulations) but goods traded between the two sides are subject to customs paperwork and clearance. The UK could in theory seek to join the EEA and also agree a customs union with the EU (though this would de facto mean full membership but without any political or decision-making power).

Beyond the formal confines of the EEA agreement, the EEA/EFTA states have opted into a range of other EU agreements, sometimes on a collective basis (e.g. Schengen) and sometimes bilaterally (e.g the EU-Norway Security and Defence Partnership).

What would the economic impact be?

In 2018, the UK government estimated that an 'EEA-type' deal between the UK and EU would reduce UK GDP by around 1.5% in the long-term (compared to remaining in the EU), while a TCA-style deal would reduce GDP by about 5%. That implies a potential long-term boost to GDP from rejoining the single market of around 3%, though several factors make the true figure uncertain: the estimate was produced eight years ago, for a country de-integrating rather than re-integrating; and we cannot be certain of the exact negative impact of Brexit on UK GDP. But it is likely to provide a bigger economic boost than rejoining the customs union or a 'Swiss-style' agreement based on partial integration into the single market.

Under an EEA-type deal, the return to free movement of people would see UK services sectors gain access to a more flexible labour market, while regulatory harmonisation would reduce technical barriers to trade for manufacturing sectors in particular. The 2018 government analysis highlights chemicals, motor vehicles and defence as some of the biggest winners - as well as food and drink, where the UK and EU are already in the process of negotiating an agreement based on dynamic alignment. The main economic loss from an EEA-type deal, compared to full EU membership, comes from customs-related barriers to trade.

The EEA states make an annual contribution to EU 'cohesion funds' to reduce economic disparities between countries and also pay to participate in other EU programmes and agencies. Norway's per-capita financial contribution to the EU was about two thirds of that of the UK during its final years of EU membership (though of course the UK benefited from a budget rebate).

How much influence would the UK have?

There is an established 'decision-shaping' process through which EEA/EFTA states can influence the EU law to which they will become subject - but they have no voting rights over the final legislation. After the Commission proposes new legislation, EEA/EFTA states participate in the 'preparatory and consultation' phase. They meet at working group level to prepare comments for the Commission, which are approved by a standing committee before submission by its secretariat-general. Comments are sometimes followed by bilateral discussions with the EU institutions. They also send 'experts' to participate in the Commission's preparatory work, with equal standing to EU experts, and EEA/EFTA state officials also participate in 'comitology committees' where subsidiary legislation is developed - allowing some further input to discussions while helping them to understand the shape of legislation and to prepare for its implementation.

A large amount of effort is also put into lobbying like-minded member states on particular issues, with some suggesting that this is more effective than formal decision-shaping powers. Similar efforts are made to influence EU law in areas, like climate, where some EEA/EFTA states voluntarily align with EU standards, even though they are not obliged to do so.

The EEA/EFTA states are also subject to the authority of the EFTA Surveillance Authority and the EFTA Court. The former monitors their compliance with EEA-relevant legislation and can bring infringement actions against them for failures of implementation, application or interpretation; while the latter rules on infringement proceedings and can issue advisory opinions to EEA/EFTA state courts on matters of legal interpretation. There is a procedure allowing EEA/EFTA states to veto pieces of legislation – but it has only ever been used once (Norway vetoed the EU postal directive in 2011 before the next government reversed this decision) and risks the EU cutting off single market access in response.

Is there any impact on migration?

Yes. Single market membership would mean a return to free movement of people with the EU/EEA states and Switzerland.

What would it mean for European security?

The EEA agreement does not cover foreign and security policy, though in theory the UK could seek to negotiate a form of association that did. EEA membership would see the UK become part of single market industrial policies such as SAFE. This would afford it an improved position in the scheme compared to the model of association on offer currently – as it would be considered one of the core states under the scheme, rather than a partner country which can only apply for a loan if it is alongside a core state (and for a limited proportion of the loan). Participation in the single market would facilitate trade in manufactured goods, which could help with joint efforts to build defence industrial capacity.

Historically, NATO membership has served as Norway's core security pillar, and there has seemingly been little to gain, from a security perspective, from EU membership. But, as US security guarantees become less reliable, and Commission competencies expand to cover a growing range of security and resilience policies, this assumption is beginning to be questioned. Professors Ulf Sverdrup and Nick Sitter write that 'as global volatility intensifies and the international order fragments, the Norwegian model increasingly looks like a strategic liability – expensive, constraining, and offering diminishing returns'. Security concerns have also accelerated discussions within Iceland on EU membership, with a referendum on whether to restart talks set for this August. An Icelandic decision to join the EU could prompt Norway to follow suit.

Political challenges

As with the customs union, around half of voters are supportive of rejoining the single market while around a quarter are opposed – but it is not clear whether they have a clear understanding of what the single market entails or are instead using it as a proxy to indicate support for closer EU relations in general. Single market membership could be very politically controversial were it put on the table. Not only would it mean breaking two manifesto red lines, it would see the UK become a 'rule-taker' in the vast majority of areas (adopting swathes of rules it has no meaningful say over) and having to make major financial contributions to the EU.

Indeed, our polling shows that rejoining the single market is markedly less popular a proposal - including among Leavers and Reform voters - than a referendum on rejoining the EU. The government may come to find that a 'halfway house' like single market membership is harder to sell to the public than a commitment to rejoin the EU: as both involve free movement and budget contributions but rejoining would see the UK exercise influence over EU lawmaking, whereas the EEA leaves it in the position of 'rule taker' in almost all sectors of the economy.

The process

Negotiations on UK EEA membership would be complex. The standard procedure would be for the UK to first seek to join EFTA (which also includes Switzerland) by presenting its candidacy and negotiating an accession agreement, before seeking to negotiate an EEA accession treaty with the EU and EEA/EFTA states. But a significant challenge is that the EFTA states may not want the UK to join in the first place. They have a long-established model of association and a strong, stable relationship with the other EEA states, resting on a high degree of mutual trust. This would be disrupted by the presence of a much larger member which has in the recent past had very antagonistic relations with the Commission and some member states - and could well again under a different government.

It is not clear whether the Commission would countenance the UK joining the EEA without first joining EFTA. It might be more open to it were both Iceland and Norway to seek and obtain EU membership - as that would leave Liechtenstein as the only remaining EEA/EFTA state, rendering the institution somewhat obsolete. However, seeking to join the EEA without first joining EFTA would likely lead to more complex negotiations, as the terms of association would be more ambiguous (would the UK seek alignment with the exact same areas of the single market?), and the UK would not be able to slot into the established institutions (the Surveillance Authority and Court) and processes available to EFTA states.

EEA membership entails continuous dynamic alignment with the majority of EU law. New EU legislation does not automatically apply to EEA/EFTA states - they have to individually transpose it into their respective legal systems. There is a clearly-defined process for managing this under the EEA Agreement.

Once the EU adopts a piece of EEA-relevant legislation, EFTA working/expert groups assess its relevance and whether it will need adaptation to national circumstances (there is a standard 16 week window to do this work). The EEA/EFTA states then issue a draft 'decision' to incorporate the act into the EEA agreement, which must be approved by the European Commission and (if any adaptations have been proposed) the Council. In some cases the Commission may request changes which are then subject to negotiation. Once agreement has been reached, the EEA Joint Committee adopts a decision to incorporate the act into the EEA agreement, and the EEA/EFTA states must then ensure its transposition into domestic law (for which they are monitored by the EFTA surveillance authority).

This is not always easy to deliver. The Joint Committee can take a long time to reach agreement on the relevance of a piece of legislation – especially as the EU is increasingly introducing cross-sectoral legislative agendas which stray beyond EEA-relevant areas – leading to a growing backlog of around 600 EU acts awaiting a decision. The process of transposition into domestic law can also be slow, especially as states may deliberately slow down the adoption of particularly controversial legislation in order to draw the political sting. This can all add friction to EU-EEA relations.

There are serious questions about whether the UK has the institutional capacity and political stability to make this process work effectively. On the institutional side, it would rapidly have to transpose large amounts of EU law to come into line with all relevant EEA law, and then maintain that alignment over time. Even EEA/EFTA states like Norway, which have been dynamically aligning for decades, can find this process difficult to manage – especially as EU competencies have expanded.

And when it comes to the politics, the EEA/EFTA states have broad cross-party support for EEA status, meaning any given government can be expected to uphold the principles of membership. In the UK, however, there is a significant possibility that a future Prime Minister might object to EEA status and repeatedly refuse to implement new EU law in domestic legislation – potentially leading to the suspension of the UK's participation in the EEA and/or trade retaliation.

REJOIN

What is it?

Rejoining would mean the UK applying to become an EU member state again. A successful application would entail being bound by EU treaties and accepting the rights and obligations that come with membership.

The UK would, likely, have to do without most of the opt-outs it enjoyed during its membership. As the Polish Foreign Minister put it, Poland would approve a UK bid to rejoin but it would "not get the same deal that it had before".

The UK had an opt out from adopting the euro. If it rejoined, it would in principle be obliged to introduce the common currency once it fulfils certain economic and legal criteria. While the UK might not be granted another legal opt-out, it is unlikely that the EU would be able to enforce a timetable. Currently, there are six member states that do not use the euro: Czechia, Denmark (which enjoys a legal opt-out), Hungary, Poland, Romania and Sweden. Some, like Poland, are in no rush and claim there is "no strong reason to abandon our own currency".

The UK was also exempt from parts of the Schengen acquis. It did not participate in the border-free travel zone but was able to benefit from related measures like the Schengen Information System (SIS) for cooperation on security and border management. Whether the EU would ask the UK to join all parts of Schengen, would likely depend on the Irish position. As Ireland and the UK share an open border under the Common Travel Area (CTA), both would have to join Schengen together.

The UK also enjoyed an opt-in/opt-out system for Justice and Home Affairs (JHA): it could choose whether to participate in matters relating to immigration and asylum, policing, civil and criminal law - a right it used in 2014 to opt out of 130 JHA measures while opting back in to those it considered in its national security interest, notably Europol, Eurojust and the European Arrest Warrant. It is unclear what incentive the EU would have to offer the UK a similarly flexible system the second time round.

Finally, the UK had a budget rebate, which lowered its contribution to the EU budget by reimbursing roughly 66% of the difference between what the UK contributed and what it received. In 2014, this amounted to almost €6.1billion, reducing its overall contribution by 35%, and making the UK the fourth largest contributor after Germany, France and Italy. If the ongoing reset negotiations are anything to go by, the UK's financial contribution would be a major sticking point in the accession process.

What would the economic impact be?

Economists typically estimate UK GDP to be around 4-5% lower, because of Brexit, than it otherwise would have been. It is reasonable to think that the majority of this would be recoverable over time, though the uncertainty and length of the accession process means there would probably be no immediate investment bump and it is not clear that all businesses that have left the UK or ceased trading with the EU would revisit those decisions.

How much influence would the UK have?

As a member state, the UK would have a formal say over all decisions taken at EU level. It would, once again, be represented across all EU institutions, and enjoy the same voting rights as other member states.

This means it would have a veto in areas which require unanimity, notably taxation; social security or social protection; the accession of new member states; foreign policy, security and defence; and operational police cooperation between member states.

In most cases, however, the Council decides by qualified majority. This is reached when 55% of member states vote in favour and these members represent at least 65% of the total EU population. Towards the end of its membership, the UK was outvoted more often than any other EU government: on 12% of votes in the legislative period 2009-15. Despite this, the UK was on the 'winning side' in 87% of cases in that period.

Beyond the day-to-day legislative process, the UK, as a member state, was able to shape the core tenets of EU policy: from the creation of the single market to enlargement and competition policy. In a similar vein, UK politicians and officials shaped the functioning of the EU institutions and research suggests the UK was a central player behind the scenes; according to data from 2006, 2009, and 2012 its officials were the most well connected among the EU28.

Is there any impact on migration?

All EU member states accept the free movement of people. It is highly likely the UK would have to do so without any special treatment.

What would it mean for European security?

Rejoining would put UK ministers back in the room when EU Foreign Ministers meet every month in the Foreign Affairs Council (FAC) to discuss the state of global affairs, from the situation in Ukraine and the Middle East to relations with China and the US. It would also allow the UK Prime Minister to be an integral part of strategic discussions in the European Council, rather than occasionally joining EU heads of state and government as a guest.

Foreign and security policy remains the exclusive prerogative of member states. This means EU membership would not prevent the UK from acting independently where it chooses to. However, the EU framework would allow the UK to coordinate policies and positions with 27 foreign ministers and heads of state and government.

The Balance of Competences report on EU foreign policy, commissioned by the Coalition government in 2012, concluded that it 'was generally strongly in the UK's interests to work through the EU in foreign policy'. It suggested the key benefits were 'strength in numbers'; an amplified influence internationally; the scale and weight of the single market; and the range and reach of EU tools, from financial instruments to military missions to development aid.

In the last few years, the EU has become a more significant defence actor, partially in response to Russia's war in Ukraine, partially to reduce its dependence on the US. This has meant a stronger role for the European Commission and the introduction of new financial instruments to encourage member states to invest together. The UK has watched these efforts mostly from the sidelines.

British governments, with their NATO-first preference, have historically been sceptical about a common EU defence policy, and large parts of the UK system are still wanting to hug the US as closely as possible. But there has been a reckoning, as outlined by Keir Starmer at the Munich Security Conference, that "as Europe, we must stand on our own two feet", and that the UK should play a pivotal role in this.

This has been borne out in 25 bilateral security agreements with 21 EU member states and the convening of Europeans and other like-minded partners in response to global events. The added value of EU membership would lie in the ability to shape EU discussions and efforts to develop a common European defence market, rather than lobbying from the outside in the hope the UK will be allowed to plug into new initiatives.

On the EU side, many would welcome (re)gaining a member with a permanent seat on the UN Security Council, a nuclear deterrent, and significant security and military intelligence capabilities. The UK's return would be seen as bolstering the EU's collective capabilities and international standing.

Political challenges

As section one showed, there has been a clear and consistent majority in favour of rejoining the EU since the middle of 2022, with opinion splitting 60:40 (excluding don't knows) on average across polling this year. However, support remains largely divided along 2016 leave-remain lines. While only 22% of leave voters think of Brexit as mostly a success, 71% of them still think it was the right decision. And while support for 'rejoin' is at 84% among remain voters, only 22% of leave voters agree.

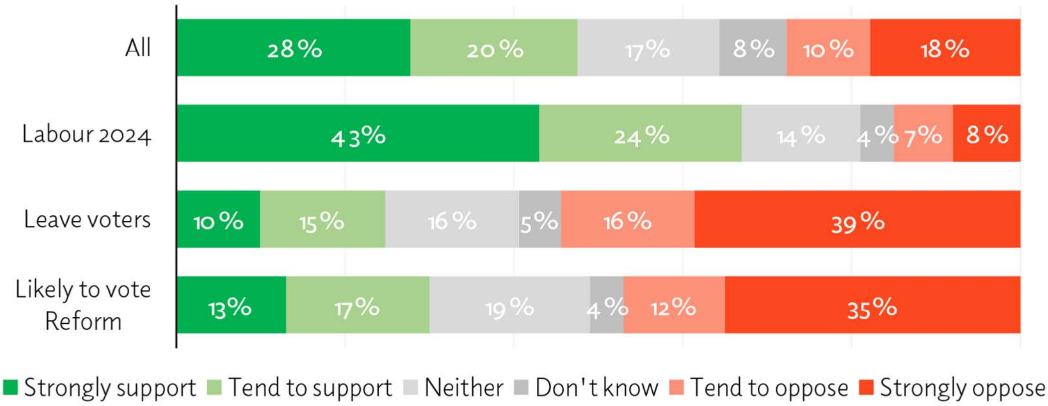
Nonetheless, public opinion is moving, and the UK political debate is slowly following suit. With the Prime Minister's future uncertain, one of the main contenders for his succession has come out in support of rejoining, even if only "one day". The Greens and Liberal Democrats have said similar.

It is often remarked that, while a majority may support rejoining in principle, most would rather avoid the 'psychodrama' of another referendum - reflected in EU affairs ranking as one of the lowest-priority issues for voters. Wider evidence does not necessarily bear that out. Our recent polling finds that 48% of voters would support a referendum on rejoining in the next five years, while 27% are opposed.

There is a clear partisan split in support for a referendum on rejoining the EU

UK IN A CHANGING EUROPE

To what extent, if at all, would you support or oppose a referendum on whether the UK should join the European Union taking place in the next five years?



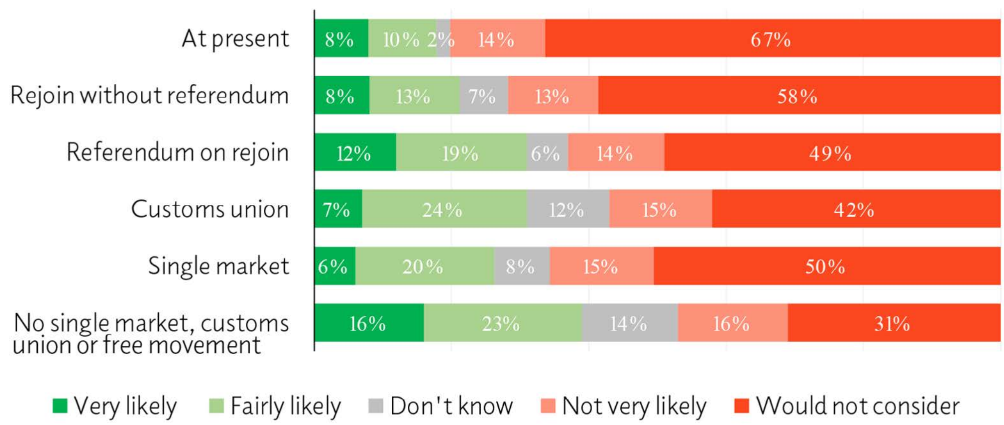
Source: Ipsos polling for UK in a Changing Europe and the Policy Institute. 2026 base: 2,245 GB adults aged 18+, 15-20 May 2026.

There is, again, a clear split along partisan lines, although Reform voters find the idea of Labour standing on a second referendum platform less off-putting than any of the other options for closer EU relations.

Rejoining without a referendum is by far the least popular EU policy for likely Reform voters

UK IN A CHANGING EUROPE

Likely Reform voters: how likely would you be to consider voting for the Labour Party if they promised the following in their manifesto at the next General Election?



Source: Ipsos polling for UK in a Changing Europe and the Policy Institute. 2026 base: 2,245 GB adults aged 18+, 15-20 May 2026.

On the other end of the spectrum, Reform and Conservatives want to 'undo' Labour's reset deal and leave the European Convention on Human Rights. The latter could collapse the Trade and Cooperation Agreement and leave the UK in 'no deal' territory. Against this backdrop, it is difficult to imagine an attempt to rejoin the EU that would not divide the country.

This will give pause for thought in the EU. Member states will be wary of negotiating and ratifying an accession treaty, only for it to be ripped up by a future government a few years later. EU member states might want to feel assured that there is a broad consensus for renewed membership in the UK.

Specifically, they will also want to feel confident that the UK understands and accepts the trade-offs of EU membership. The Polish Foreign Minister recently warned he did not think it made sense for the UK to apply unless it had internalised "the fundamental European deal that, you get more benefits in return for more pooling of some aspects of sovereignty". Without this realisation, it would never be a "happy member".

The UK would also have to accept that it is rejoining an organisation that is different from the one it left. More deeply integrated in security and defence, more open to common borrowing (as evidenced during the pandemic), and increasingly shaped in the image of French preferences for European autonomy. This might not be to the UK's liking but it would have to accept it regardless.

And of course public opinion might shift over the course of what promises to be lengthy, complex and potentially acrimonious negotiations. How these talks unfold, and how they are portrayed at home will shape the domestic debate. It is easy to see how pressure for another referendum might grow even as the terms of reentry are negotiated, while repeated evidence of what, to the UK, might seem like an overly demanding set of EU asks could lead to a public backlash. Briefly put, it is hard to know what impact the process of rejoining might have.

While EU leaders will be wary of political instability in the UK, they would likely welcome a UK application to rejoin. Partly, this is because of geopolitical pressures and the value of having a major economic and military power as part of the club. Added to which there is the political incentive that there could be no clearer admission of the failure of Brexit than a UK application to rejoin.

The process

In the UK, the path to rejoin would likely require another mandate from the public. There are different ways of going about this: the government could fight a general election on a promise to rejoin the EU without a referendum, or it could promise to put the matter back to the country via a referendum. Alternatively, it could promise to hold a confirmatory referendum once an accession treaty has been negotiated.

On the EU side, there is a clearly defined process. Article 49 of the Treaty on European Union (TEU) establishes who can join and how. Membership is open to European countries who respect and commit to promoting the EU's values in Article 2 (TEU), relating to democracy, the rule of law, human rights and equality. This is advantageous for the UK, as the EU would be bound to consider its application using formal processes - which is not the case should it seek other models of association such as EEA membership or a Swiss-style deal.

The European Council has defined additional criteria, the so-called Copenhagen Criteria, which countries need to meet before joining. These are political (stable institutions, rule of law, human rights and minority protections); economic (a functioning market economy which can cope with competition in the EU market); and institutional and administrative (the ability to implement the obligations of membership).

The accession process looks the same for every country. It is divided into four stages: application, candidate status, negotiations and, finally, accession. To move from one stage to another, it requires Commission and unanimous Council approval, as well as sign-off from EU heads of state and government.

First, the UK government would have to notify the Council of its intention to rejoin. The Council would then ask the European Commission to assess whether the UK meets the criteria for membership. The Commission's 'opinion' would likely consider the state of the relationship, including the UK's history as a former member state, the implementation of the Trade and Cooperation Agreement and Withdrawal Agreement, and the state of the 'reset' negotiations under Labour. It would also assess the state of the UK's political institutions and economy, and its ability to assume the obligations of membership. The Commission would surely comment on the risk that the UK might seek readmission only to leave a second time.

If the Commission's opinion is positive overall, and the European Parliament gives its consent, the General Affairs Council (composed of the 27 EU affairs ministers), acting unanimously, grants the UK candidate status.

Formal negotiations can begin once the Commission has been given a mandate, and a start date has been set. These are structured into six thematic clusters (fundamentals; internal market; competitiveness and inclusive growth; green agenda and sustainable connectivity; resources; agriculture and cohesion; external relations) and 35 chapters.

In truth, negotiations are less about a genuine give and take between the EU and a candidate country than determining how quickly a country can adopt and enforce the obligations of membership. The UK has rarely diverged from the EU since its exit, so that most chapters could be concluded quickly. However, history shows that even a 'quick' accession takes time. The fastest accession took just under three years: Finland submitted its formal membership application in March 1992 and formally joined in January 1995. The EU might not want to hurry the UK's accession talks to make sure the bid to come back is sustained and serious, possibly even extending it over two parliaments.

For the UK, there are obvious sticking points which could slow down progress. These range from the size of the UK's budgetary contribution to fishing quotas to whether the government would try to secure any of its previous opt-outs. Concessions would only be possible if all member states agreed. Unanimous Council approval is required at almost every step of the way: to adopt the Commission's screening reports for each chapter, to open a chapter, as well as to provisionally close one.

The final hurdle would be the ratification of the accession treaty. It must be approved not only by a majority in the European Parliament and unanimously in the Council, but also by the national parliaments of each EU member state 'in accordance with their respective constitutional requirements'. In most cases, this means a parliamentary vote. France would be required to hold a referendum, following its 2005 constitutional reform for the ratification of future accession treaties. There is an alternative route through the French parliament, however this would require both the National Assembly and the Senate to adopt, by a three-fifths majority respectively, a motion authorising parliamentary ratification of the accession treaty.

CONCLUSION

Ten years after the referendum, the UK's relationship with the EU is far from settled. The Labour government is facing a dilemma: whether to continue down the path of incremental tweaks to the current relationship, protecting the manifesto red lines but offering only marginal economic gains; or to take a political risk and break the red lines in the hope of greater economic returns.

Many variables could affect its future thinking: from a potential change of Prime Minister and the simultaneous electoral threat to Labour from the liberal-left and right, through to further exogenous shocks like surging global energy prices which amp up domestic economic pressures. But an often overlooked factor in UK debates is the EU itself. Brussels has established clear principles for integrating third countries into its market. These will not change just because the Brits want them to. And not all UK attempts to get closer to the bloc will necessarily be met with open arms.

The EU is broadly happy with the TCA which, from the perspective of Brussels, functions well and has brought some much-needed stability to UK relations after years of tempestuous negotiations. The EU has less to gain economically from a different form of relationship than the UK, and reopening the Brexit file risks unwelcome turbulence at a time when it has any number of other priorities - from the US, to Ukraine, to China. Moreover, there is a risk that within three years the UK will have a pro-Brexit Prime Minister who would rip up any new deal. For the EU even to countenance a different form of relationship, it would have to be convinced that the UK knows what it wants.

Which brings us to a question of what an alternative model of relationship might look like. We've devised a lovely 'staircase' spelling out the options: a customs union, a 'Swiss-style' deal, EEA (single market) membership, or rejoining the EU outright. This rests on a clear internal logic: each 'step' on the staircase necessitates a higher degree of alignment with EU law and, in return, is likely to lead to greater economic dividends. All but the customs union also require free movement of people. Labour figures may soon be poring over economic modelling and polling data to find the 'goldilocks' step which provides the best balance between economic benefits and electoral palatability.

But, in reality, there is no goldilocks option when it comes to EU relations. Each and every choice comes with significant challenges. Sticking with the Common Understanding might seem like the easy option but offers few economic gains and does not look politically tenable if Starmer is ousted. A customs union would offer only marginally greater gains while breaking a manifesto red line. The

Swiss and EEA options bring greater economic returns but mean accepting free movement of people, making major budget payments, and being a 'rule-taker' in a wide range of sectors.

Halfway houses are, after all, not designed for permanent dwelling, and the evidence in this report suggests that voters are not especially taken with them. Full EU membership is seemingly more popular: it brings the biggest economic wins and would give the UK much more influence over EU law - as well as greater geopolitical clout - but negotiations would be long and difficult, with the UK returning on less advantageous terms than those on which it left.

The problem with the last ten years of campaigning, 'getting Brexit done' and 'making Brexit work', is that successive governments have not been honest about these trade-offs. For any change to the status quo, the government will have to be honest: both to explain to voters why it is dropping its red lines, and to convince the EU it knows what it wants and accepts the fundamental compromise between autonomy and market access. That, more than anything else, would be the novelty in the UK's EU policy.

UK in a Changing Europe promotes rigorous, high-quality and independent research into the complex and ever changing relationship between the UK and the EU. It is based at King's College London.

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How to cite this publication:
UK in a Changing Europe (2026),
Ten years on: what next for UK-EU relations?.
https://ukandeu.ac.uk/reports/ten-years-on-what-next-for-UK-EU-relations/