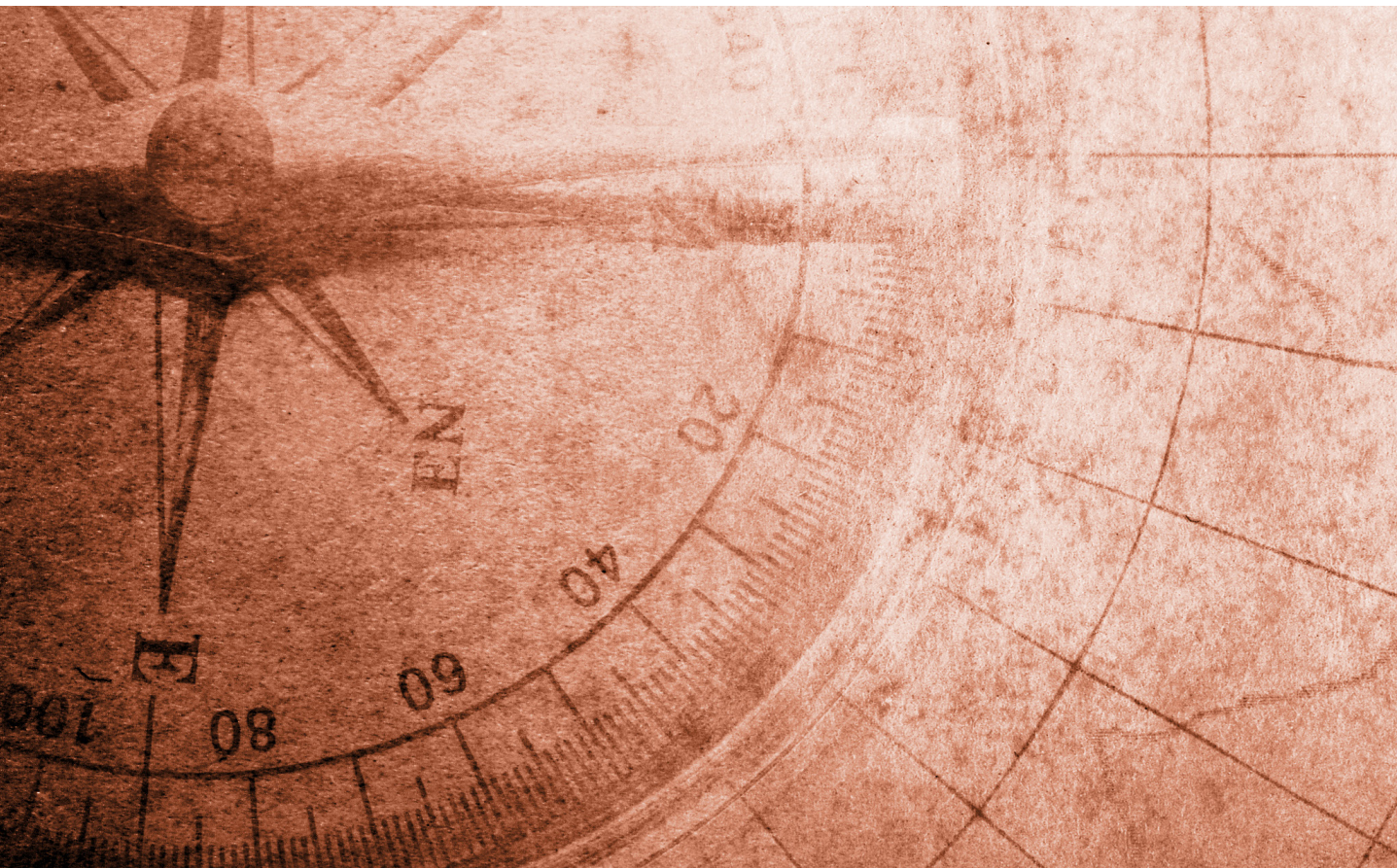




## Navigating the Road Ahead: Brexit, Trade and a White Paper

Second Quarterly UK Retail Brexit Trade Review – August 2018





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# Introduction: Second Quarterly UK Retail Brexit Trade Review

## Welcome to the Second Quarterly UK Retail Brexit Trade Review.

Since we launched the service in March, we have witnessed an ongoing trade war between the US and China; a visit from President Donald Trump; the recently launched White Paper following the Cabinet's deliberations at Chequers; the resignations of both the Brexit Secretary and the Foreign Secretary; and the tense debates regarding the Trade Bill and the Customs Bill, which demonstrated the finely balanced state of the UK's negotiating position.

As we look towards the summer recess in Parliament, the government is promising to publish detailed plans regarding how the UK should plan for no deal by 29 March 2019. At the same time, the EU is keen to finalise the negotiations over the Withdrawal Agreement.

In this report, we focus on the impact of Brexit, but also consider the ongoing trade wars, including:

- An executive summary of the latest state of play
- A summary of key Brexit developments since April
- An analysis of the White Paper and the impact on imports, as well as the practical legal and regulatory steps you should consider
- An explanation of the most likely Brexit trade models
- A summary of the Brexit timetable
- An updated analysis of the potential impact of Brexit on the retail sector

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**The Squire Patton Boggs and Retail Economics UK Retail Brexit Trade Service provides retailers and those involved in the retail supply chain with support to plan, prepare and effectively implement changes to be "Brexit ready".**

Our service provides crucial insight into Brexit's multi-staged policy implications. While focusing on key issues that affect you, we also understand the peripheral issues that impact the market as a whole.

**For retailers** – Risk levels are maximised for EU trade. Our service helps safeguard you against oversights in new costs and regulation arising from policy developments. We scenario plan and model for what the new trade deal could mean and highlight cost implications from customs duties on different products (e.g. sensitive products).

**For companies selling services into the retail industry** – Keeping abreast of how Brexit affects your core customer base is essential for sharpening your business strategy and recognising how best to foster key relationships during turbulent times ahead. Our service gives you this insight.

### Who Will Benefit From the Service?

- Board, senior-level executives and legal teams at UK-based retailers or international retailers with UK interest
- Suppliers to the retail sector
- Companies involved in the retail supply chain
- Advisers with significant interest in the retail sector, such as manufacturers, logistics and many others

A photograph showing several paper boats made from folded US dollar bills, floating on a light blue map. The map features a grid of latitude and longitude lines, with various geographical labels and elevation contours. The boats are arranged in a line, receding into the background. The lighting is soft, creating a professional and conceptual atmosphere.

# Executive Summary



# Executive Summary: Second Quarterly UK Retail Brexit Trade Review

## Key Points

In summary, the following points summarise the latest state of play:

### 1. White Paper and Imports

### 2. The Risk of New Tariffs and Costs on Imports From the EU Has Risen

Although this is not the most likely outcome, there is a growing chance of a hard Brexit as soon as 29 March 2019, by default, which would lead to substantial new costs and delays to delivery times for trade with the EU. This outcome would particularly affect food imports, which would be subject to the highest rates of duty and would become subject to onerous border checks for food safety and animal welfare.

### 3. A Customs Union Is Still an Option Despite the Government's Red Lines

There is still considerable support for this option within the UK Parliament (including the Labour Party) and the business community. A customs union also remains the best option to enable Good Friday Agreement terms to be met regarding the Irish land border.

### 4. The Withdrawal Bill Gives Retailers Legal Certainty Post-Brexit

Although the future trading relationship between the EU and the UK is far from settled, other areas of regulation now look more certain. The EU Withdrawal Bill has now passed into law, providing a legal basis for the UK to apply EU-originating legislation in areas as diverse as environmental protection, consumer law, general product safety, health and safety, and animal welfare.

### 5. Home Office's Statement of Intent Relating to Its Settlement Scheme for EU Citizens in the UK

In line with the agreement on citizens' rights outlined in the draft Withdrawal Agreement, the Home Office has provided further guidance on how EU citizens resident in the UK before 31 December 2020 will be able to obtain permission to stay in the UK in the form of settled or pre-settled status.

### 6. New Costs Are Emerging on Trade With the US

A long-running trade dispute on steel and aluminium has recently expanded to include consumer products. When fully implemented, these tariffs will cost UK retailers around £200 million per year. There is a significant possibility that this dispute will escalate further, as the US has now opened an investigation into EU car sales to the US.

### 7. In the Meantime, the EU Has Been Active in Trade Negotiations With Other Countries

The EU opened free trade agreement (FTA) negotiations with Australia and New Zealand in May and finalised agreement of a new FTA with Vietnam in June. Progress is being made to ratify the EU's FTAs with Japan and Singapore, which are expected to be in place later this year. However, only slow progress has been made in ongoing FTA negotiations with Mercosur (Brazil, Argentina and Uruguay).

## Summary of Retail Imports Into the UK in 2017

Retail Sector	Total Imports	Imports From EU (£million)	Imports from Non-EU (£million)	EU Share
Food and Drink	£41,618	£30,330	£11,288	73%
Electricals	£35,793	£17,645	£18,148	49%
Health and Beauty	£18,812	£12,801	£6,011	68%
Clothing and Footwear	£27,183	£10,176	£17,007	37%
DIY and Gardening	£11,005	£6,604	£4,401	60%
Furniture and Flooring	£10,121	£4,759	£5,362	47%
Sports, Toys and Leisure	£5,317	£1,396	£3,921	26%
Homewares	£4,680	£1,145	£3,535	24%
<b>Total</b>	<b>£154,529</b>	<b>£84,856</b>	<b>£69,673</b>	



# Executive Summary: Second Quarterly UK Retail Brexit Trade Review

## Key Recommendations

### 1. Continue to Prepare for All Three Possible Brexit Outcomes

- **World Trade Organization (WTO)/most favoured nation (MFN).** A failure to agree an FTA or customs union would mean that the UK's trading relationship with the EU would revert to MFN terms.
- **Free trade agreement.** An FTA could avoid tariffs on imports from the EU, but introduces some new costs in the form of customs declarations and compliance with rules of origin.
- **Customs union.** A customs union would ensure that import costs stay very much as they are for sourcing both from the EU and from the rest of the world.

### 2. People

Prepare for an increase in recruitment competition and salary costs.

### 3. Supply Chain

All existing contracts need to be reviewed with a focus on tariffs, VAT, intellectual property, customs delays, pricing commitments and possible regulatory changes. Make sure that all new contract negotiations are done so with an eye on Brexit.

### 4. Finance

Plan for the impact of potentially adverse cash flow issues on your business, whether this is through VAT, additional time required due to customs clearance, supply chain issues, etc.

### 5. Brexit Timetable

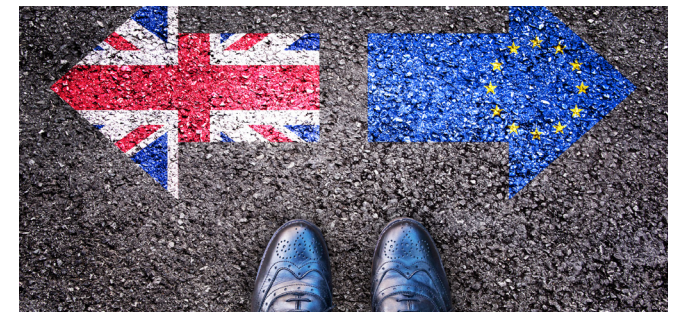
Keep an eye on the Brexit timetable and make sure that your key stakeholders report back to the board or Brexit Working Group to keep you ahead of the curve.



## Overview of the Key Brexit and Trade Developments in Quarter 2 (April – June 2018)

### 1. EU Withdrawal Bill

The EU Withdrawal Bill has now become law in the UK. It provides the legal basis for the UK to apply EU-originating legislation in the UK after Brexit and provides legal certainty for retailers and companies in areas like environmental protection, consumer rights and general product safety. The legislation was successfully amended to allow Parliament a “meaningful” say on any deal between the UK and the EU, although it is not clear how this will be expressed.





# Executive Summary: Second Quarterly UK Retail Brexit Trade Review

## 2. Negotiations With the EU – Legacy Issues

- Substantial progress has been made on settling the UK's future financial obligations to the EU and on most aspects of citizens' rights.
- Agreement has been reached that any future trade arrangements between the UK and the EU must respect the terms of the Good Friday Agreement, which requires absence of physical infrastructure or checks at the Irish land border, although there is not yet a common view as to how this will be achieved in the long term. Meanwhile, there is agreement on the need for a "backstop" that would retain Northern Ireland in the EU's Customs Union and relevant parts of the Single Market. Again, there are still significant differences of opinion as to how this would work.

## 3. Negotiations With the EU – Transitional Arrangements

Substantial agreement has been reached on the terms of a transition period that will run from 30 March 2018 to 31 December 2020. During the transition period, EU rules will continue to apply in the UK as they currently do. Retailers should not notice any differences in day-to-day activities, including the ability for UK firms to participate in EU projects and the free movement of people. However, final agreement on a transitional period is dependent upon agreement in other areas of negotiations (i.e. nothing is final until everything has been agreed).

## 4. Negotiations With the EU – Future Trading Relations

Despite agreement at the EU Summit in March to progress to trade discussions, very little progress has been accomplished regarding the future trading relationship with the EU. Principally, this is because of the government's inability to agree upon policy objectives in this area. Deep divisions remain within government between (1) those who are prepared to pay the price for a close economic partnership with the EU involving adherence to a wide range of EU rules extending beyond trade; and (2) those who are prepared to pay the price for regulatory freedom encompassing new costs and barriers to EU trade. Failure to resolve these disagreements has led to the government's White Paper on future trade relations with the EU being postponed until July.

## 5. Settlement Scheme for EU Citizens in the UK

- EU citizens and their families living in the UK on 31 December 2020 will have until 30 June 2021 to make an application for status.
- In most cases, those who have been continuously resident in the UK for five years will be allowed to stay indefinitely by obtaining settled status.

- EU citizens and their families who arrive by 31 December 2020 but have not been in the UK for five years will be eligible for pre-settled status, enabling them to stay in the UK until they have been here for five years, at which point they will be able to apply for settled status.
- EU citizens and their families with settled status or pre-settled status will have the same access as they currently do to public services such as healthcare, schools, public funds and pensions.

To obtain settled status, the Home Office will no longer require EU citizens to prove what they have been doing in the UK (e.g. working, studying, etc.) during the five-year qualifying period – they will merely have to show that they have been resident here for five years. This may encourage current EU workers to remain in the UK, although it is worth bearing in mind that the settled status process has not yet been set in stone – the Statement of Intent is still subject to parliamentary approval and consultation with relevant user groups and other stakeholders.

The government has also avoided giving any definitive answer as to what will happen to EU citizens in the UK if it leaves the EU without a deal. Whilst it would seem likely that the current plans for settled and pre-settled status (or something very similar) would remain in place whether the UK leaves the EU with or without a deal, the continuing uncertainty may mean that retailers lose valued employees in the meantime.

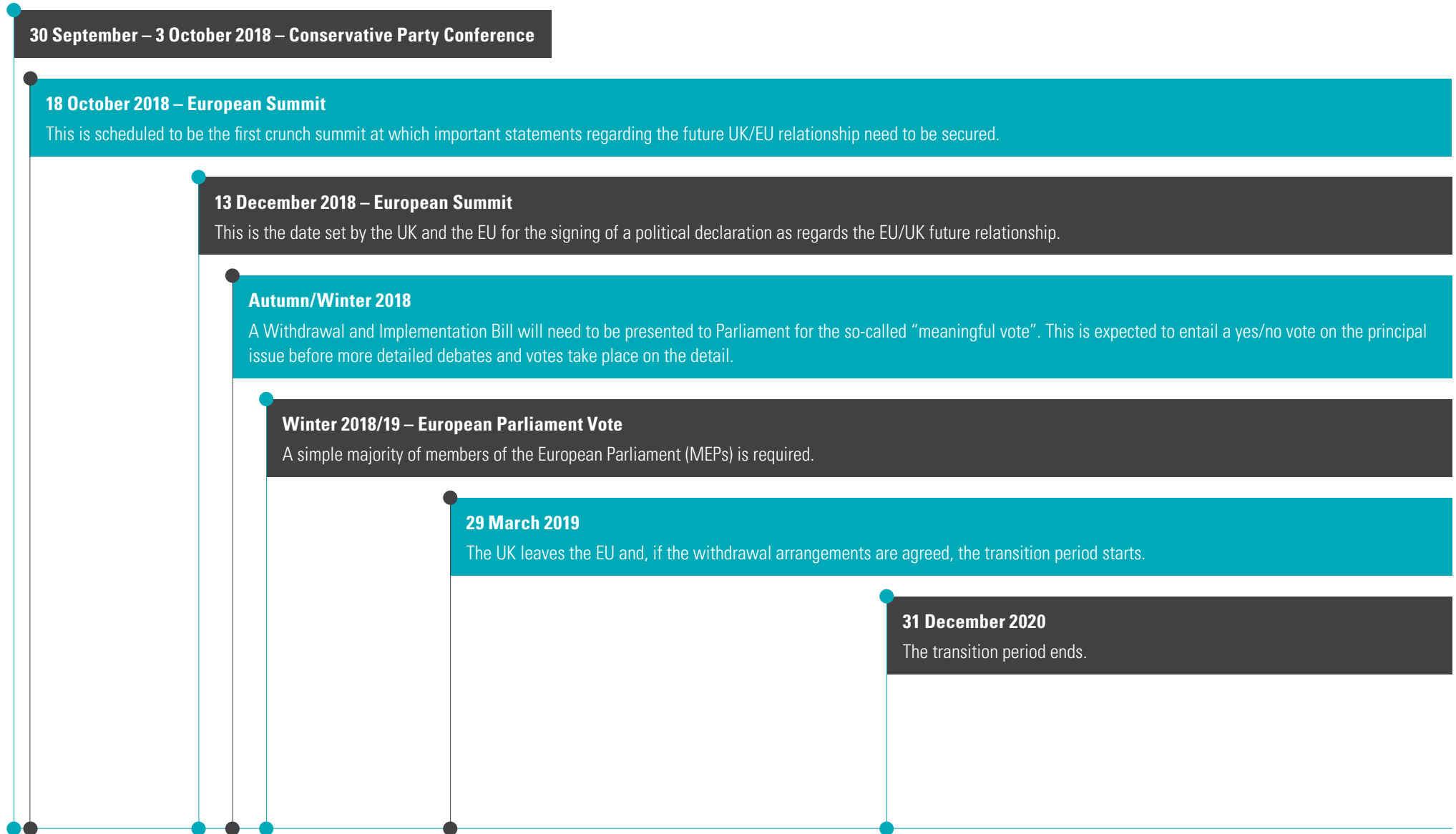
## 6. Trade Relations With Other Countries

- **EU trade relations with other countries.** The EU has agreed details of a new FTA with Japan (its largest FTA to date) and Vietnam and is finalising approval of a new FTA with Singapore. It has also made some progress in negotiations for an FTA with Mercosur (Brazil, Argentina and Uruguay). In May, the EU took a decision to open FTA negotiations with New Zealand and Australia. More widely, the new trade barriers have emerged as a result of the expansion and escalation of a trade dispute between the US and other countries. The dispute, initially restricted to the steel and aluminium sector, has now widened to include a range of consumer products with the EU – applying additional duties on US motorbikes, fruit juices, jeans and bourbon whiskey. Resulting costs from these duties could reach £200 million a year for UK retailers (based on existing trade levels).
- **UK trade relations with other countries.** Generally, the UK has received positive responses from other countries regarding the proposal for existing bilateral trade deals with the EU being extended to cover the UK after Brexit. However, solid progress is restricted until the UK and the EU have agreed their future trading relationship.



# Executive Summary: Second Quarterly UK Retail Brexit Trade Review

## Brexit Timetable: The Clock Is Ticking





A pair of scissors is shown cutting through a white paper strip that separates a Union Jack flag on the left from a European Union flag on the right. The scissors are positioned vertically, with the blades meeting at the center of the white strip. The Union Jack is on the left, and the EU flag is on the right. The white strip is being cut, and the two flags are being separated.

# White Paper



# White Paper

## Impact on Imports

The government's White Paper on future relations between the UK and the EU proposes a new model for trade in goods that attempts to combine elements of a customs union with elements of an FTA into what the government is calling a "free trade area", which encompasses the UK and the EU.

This free trade area will be enabled by a "facilitated customs arrangement", the aim of which is to allow trade in goods between the UK and the EU to continue as present (as if the UK and the EU were still in a customs union), whilst simultaneously allowing the UK to negotiate different terms for trading with other countries.

There are questions regarding whether the proposals will be acceptable to the UK Parliament, to the EU or, indeed, to other trading partners. Many elements of the proposals are vague and some are mutually contradictory. In addition, there is no explanation of how the plan would be compliant with the WTO's international trading rules. However, putting aside these concerns, if such an arrangement was to be agreed and put in place, the main implication for retailers and other importers of finished goods would be as follows:

### Imports From the EU

All manufactured goods sourced from the EU will be free of customs duties and there will be no need for traders to complete customs formalities (e.g. customs declarations and compliance with rules of origin). To facilitate this arrangement, the UK will commit to following all EU rules that would normally require border checks if goods had been imported from outside the EU. For manufactured goods, this would include all EU-wide product standards, testing requirements and authorisations (this is what is meant by the "common rule book"). As time goes on, the UK will adopt any new rules that the EU devises in these areas.

In addition to following EU rules on goods, the UK will participate in the relevant EU agencies and systems as before, including the RAPEX early warning system for dangerous goods and in the relevant technical committees for standards (although it would have no voting rights in these).

Trade in food and drink will also be free. The UK will make an upfront commitment to follow all EU agri-food rules that would otherwise require checks at the border. This means all "Sanitary and Phytosanitary" rules (plant and animal health). The UK also proposes that it should participate in the relevant technical groups and systems (e.g. RASFF) so as to alleviate the UK simply being seen as a rule taker. However, the UK will not be bound by EU rules on the marketing of foods (e.g. food information and labelling or the protection Geographical Indicators) and will be free to operate independently. In addition, the UK will not be bound by rules on agricultural production (CAP), leaving the UK free to operate a different system of subsidies and support for farming. In passing, the White Paper also excludes following any EU rules on unfair trading practices in the food supply chain.

Such an arrangement will allow the free flow of goods across the Irish land border (avoiding the need to implement the so-called "backstop" proposals for Northern Ireland), but even more significantly for UK retailers, it will allow goods to continue to be traded through the port of Dover, which currently has no infrastructure to deal with either customs or veterinary checks.





# White Paper

## Imports From Beyond the EU

The White Paper proposes a complicated and elaborate system for dealing with imports from the rest of the world.

When the UK leaves the EU, the UK will be free to set its own tariff rates. It can do this unilaterally by independently setting its MFN rates and its preferential rates for imports from developing countries. It can also offer preferential rates to individual countries through bilateral trade deals. The UK will also operate an independent trade defence (anti-dumping) regime. All of this is standard practice for a separate customs territory.

What is entirely unique in world trade is that the White Paper proposes that the UK operates its tariff rates alongside those of the EU (this is recognised in the White Paper as a “combined customs territory” – an entirely new term). Goods arriving from the rest of the world will be charged the UK tariff if they are destined for the UK market and the EU tariff if they are destined for the EU market. However, if the importer cannot prove where the goods are destined, they must pay whichever is the higher tariff and seek a refund of the difference when the final destination has become clear.

The White Paper proposes that this scheme should only apply to goods that arrive first in the UK and not to goods that arrive first in the EU. In other words, goods that are imported into the UK via the EU (e.g. Rotterdam) will always be charged the EU rate and will not be subject to refunds if the UK tariff rate is lower.

The White Paper acknowledges that the system it proposes could be vulnerable to circumvention of customs duties in instances where goods are cleared through UK customs at a lower rate of duty and then shipped on to the EU. It, therefore, suggests a number of tools to combat this (under the heading “market surveillance”), including the development of trusted trader schemes, use of artificial intelligence (AI) and machine learning, draconian sanctions for fraud and so on.

The White Paper acknowledges that it will take time to put these market surveillance arrangements in place and it envisages a “phased implementation” of the scheme. This means that although the UK will be free to set tariff rates that are different (lower) to the EU as soon as any implementation period finishes (i.e. at the end of 2020), in practice, traders are likely to have to pay the higher EU rates in the first instance and then seek refunds after proof of sale in the UK. As new “facilitation” measures are introduced, and the system of tracking goods becomes more sophisticated and robust, UK traders will be able to take advantage of lower duty rates at the point of importation into the UK.

Overall, if accepted, these proposals would mean that UK importers would face no new costs on sourcing goods from the EU or from the rest of the world. In addition, products including agri-food would continue to be regulated according to EU rules, where these exist (although rules on the marketing of products may change). Over time, there may be opportunities to reduce the cost of importing from outside the EU as a result of lower UK tariff rates, although in the short term, these cost savings may be outweighed by the administrative cost of applying for refunds.



# White Paper

## Broader Legal and Regulatory Impact

### People

The White Paper acknowledges the agreement already reached with the EU that freedom of movement will continue until the end of December 2020 and the right for EU citizens living in the UK and UK nationals living in the EU before that date to apply for residence in their host country.

The White Paper states that freedom of movement of people will end following this transition period and provides minimal detail on a "Framework for Mobility". This will be informed by the Migration Advisory Committee's report, due in September 2018, and ultimately determined by reference to trade agreement negotiations with the EU, hinting towards a preferential immigration system for EU citizens compared to non-EU citizens.

#### What Do Retailers Need to Do?

- Prepare for some form of restricted access to the EU workforce at all skill levels from 1 January 2021
- Continue to communicate with and support EU workers in the UK to stem the flow of those returning home
- Consider designing flexible working solutions that attract, retain and develop the best talent, with a focus on students, working families, pensioners and those seeking to return to work
- Recruit from other consumer-facing sectors
- Consider longer-term recruitment drives and skills development for apprenticeships and school leavers
- Look to further engage in corporate responsibility-supporting projects, such as the rehabilitation of offenders and encouraging the long-term unemployed back to work
- Optimise the use of the Apprenticeship Levy to upskill current workers
- Prepare for an increase in recruitment competition and salary costs
- Prepare for a shortage of labour in areas such as customs administration and warehousing – start training and recruiting now
- Any visa process for new EU arrivals will add additional cost and administration to recruitment processes





# White Paper

## Supply Chain

Brexit will have an impact on both existing and future supply chain contracts. This could lead to a potentially huge exercise to review existing agreements to understand how Brexit might affect their viability and whether it is possible to change or break them early. For new contracts entered into during Brexit negotiations, it means extra work assessing the likely impact of Brexit (despite all the unknowns) and building in enough flexibility to accommodate uncertainty.



## Reviewing Existing Contracts

Different contracts will be affected in different ways in terms of how they deal with tariffs, customs delays and other issues. For example, the following issues will all have an impact on what is achievable regarding existing contracts and what can be agreed as regards new contracts:

- Will either party be able to avoid any contractual obligations based upon arguments of frustration and force majeure?
- To what extent can relief be sought via any change control or material adverse change clauses?
- To what extent are delivery commitments fixed?
- To what extent does the contract deal with change in law?
- To what extent are pricing commitments fixed?
- Do prices include or exclude tariffs?
- Who is to pay for any customs compliance costs?

## What Do Retailers Need to Do?

If you have not done so already, all contracts need to be reviewed with a focus on:

- Flexibility
- Who pays tariffs
- Time for performance and impact regarding customs delays
- Who is responsible for customs clearance
- If staff need to travel between the UK and the EU in order to perform contractual obligations
- If there is a risk of staff/skills shortages
- If there are any risks regarding losses of skills accreditations
- VAT changes
- Data transfers
- Intellectual property issues
- Payment provisions and currency
- Any regulatory changes
- Any issues relating to the laws and regulations that apply to the contract
- Any hardship, relief or material adverse change provisions:
  - Is there a change control process?
  - Is force majeure an option?
- Termination options

# White Paper

## Negotiate New Contracts

All cross-border supply chain contracts in the retail sector need to be drafted with Brexit in mind. When negotiating new contracts, seek to mitigate against the key risks of the UK not reaching agreement with the EU on Brexit or on any deal being unfavourable to the UK retail sector.

### What Do Retailers Need to Do?

- Seek clarity on what is meant by geographic references to the EU and the UK
- Review the potential impact of tariffs, customs clearance and customs delays
- Understand the jurisdiction for resolving disputes and related resolution procedures and options

## VAT

The White Paper confirms the government's intention to leave the EU Single VAT area. This will mean that upon leaving the EU, cross-border trade in goods with the EU will be classed as imports. We will need new reporting obligations and movement of goods documentation. For retailers, this will mean additional VAT registration requirements and increased costs. We could also see the rerouting of supply chains.

Currently, intra-EU supplies of goods are generally subject to acquisition rather than import VAT, whereas after Brexit, imports from the EU27 are likely to be subject to import VAT. Import VAT results in a cash flow cost for a fully VATable EU importer. The importer pays the VAT on import and then recovers it on its VAT return. In contrast, there is no cash flow cost on an EU acquisition for a fully VATable EU acquirer. The EU acquirer simply makes a self-cancelling double entry in its VAT return: it charges itself to output tax that it then recovers as input tax.

### What Do Retailers Need to Do?

- An in-depth understanding of the impact of potentially adverse cash flow issues on your business is critical

## Customs

If the UK does not enter into a new customs union, customs declarations will be required each time goods cross the UK/EU border in much the same way as when goods are exported to or imported from non-EU countries. Other costs and delays are expected to affect supply chains as a result. Clearly, any changes to the UK's trading relationship with the EU may require extensive work to reconfigure all manner of systems and to handle more complexity in terms of information held, the frequency of data submission and for customs declarations.

### What Do Retailers Need to Do?

- Audit IT systems to deal with the change in status of the EU27 countries and all other countries with whom the EU has an FTA in place
- Develop IT systems and processes to deal with the potential of customs declarations (including rules of origin compliance), being required between the UK and the EU27, together with related excise and VAT systems
- Recruit more people to deal with customs declarations
- Consider obtaining Authorised Economic Operator (AEO) status, as this allows for faster customs clearance of goods if the procedures of a company are considered compliant by the customs authorities in both countries – but this is a complex process, which, in its own right, can take up to a year
- Build in the additional cost and time that is required for customs clearances and declarations into the process
- Consider what contingency plans can be put in place to deal with delays at borders – essentially, this will entail a degree of stock piling of goods so that existing just-in-time schedules can be maintained (but this adds cost)
- Consider additional warehousing sooner than later, given that demand is likely to push up prices
- Consider alternative shipping routes to avoid busy ports



# White Paper

## Rules of Origin

If the UK government manages to agree an FTA with the EU, it will be necessary to ensure that the content of those components that are sourced from any EU27 countries for inclusion in UK manufacture goods count as UK content. In these situations, it is necessary to consider the origin of any raw materials, the country in which final substantial production took place and the value of the processing of components in other countries. Here, if goods are to qualify for tariff-free trade, they must satisfy the applicable rules of origin tests.

### What Do Retailers Need to Do?

- Consider how this will work in relation to consumer goods going in and out of the UK several times; this will be a matter for detailed consideration
- Consider whether consumer goods that are currently imported from the EU can be sourced or manufactured in the UK at a sufficiently competitive price
- Prepare for the additional administrative burden of dealing with rules of origin in the context of the FTAs that are negotiated by the UK with the EU and other countries



# Services We Offer

The background of the slide is a blurred photograph of a meeting room. In the foreground, a glass table holds several sheets of paper and a black pen. In the background, there are several brown leather chairs arranged around the table. The overall scene is brightly lit, suggesting a professional and collaborative environment.



# Services We Offer – How You Can Benefit



## Retail Industry Analysis

We can provide tailored impact assessments based on robust economic and legal analysis and expert retail insight, relevant to your specific needs, that are actionable, reportable and support you in making sound business decisions.



## Monitoring

We can implement a monitoring service to ensure that all key retail industry-related legislative, regulatory and policy developments arising from Brexit, specifically tailored to your requirements, are captured in an easy-to-read report. Areas of focus could include:

- |   |  |   |  |
|---|--|---|--|
| <ul style="list-style-type: none"><li>• Immigration</li><li>• Labour and employment</li></ul> | <ul style="list-style-type: none"><li>• Commercial contracts</li><li>• Distribution arrangements</li></ul> | <ul style="list-style-type: none"><li>• Data privacy and cybersecurity</li><li>• Intellectual property rights</li></ul> | <ul style="list-style-type: none"><li>• Industry-specific issues</li><li>• Trade and customs</li></ul> |
|---|--|---|--|



## Planning and Preparation

- **Advisory** – Our retail Brexit specialists can advise on designing and implementing strategies for your UK and wider global operations, which help mitigate the risks and uncertainties that stem from Brexit by planning and preparing contingency measures on Brexit-specific strategies.
- **Economic evaluation** – Our independent research provides concise analysis of the need-to-know economic factors affecting your business. Understanding the dynamic macroeconomic environment will be critical in implementing your Brexit strategy.
- **Scenario planning** – Whether you are just starting your scenario planning, have already made strategic decisions (i.e. taken risks and invested in new manufacturing facilities in the EU) or are looking to invest in infrastructure or develop new supply chains, we can help by advising on:

- |   |  |
|---|--|
| <ul style="list-style-type: none"><li>• Cost changes from customs duties</li><li>• Impact of transitional arrangements or changes to existing practice</li><li>• Effect on commercial contracts and arrangements with suppliers</li></ul> | <ul style="list-style-type: none"><li>• Whether a transitional EU-UK customs union will require customs declarations</li><li>• Implications for your overseas sourcing costs</li></ul> |
|---|--|



## Engagement

We can support you when you need to engage with government. We can help to make the right introductions, influence policy and get the inside track on political conversations.

A close-up photograph showing the corner where the Union Jack (United Kingdom flag) and the European Union flag meet. The Union Jack's red and white stripes are visible on the left and bottom, while the EU flag's blue field with yellow stars is on the right and top. The text is overlaid on a white horizontal band across the middle.

## **Possible Brexit Trade Models**

Where Are We Now?



# Where Are We Now: Customs Union

A full customs union with the EU would result in the lowest cost option for businesses importing goods from the EU, avoiding tariffs, rules of origin and most (if not all) other customs formalities. It is the sole option that could help deliver genuine “frictionless trade”.

However, in a customs union, the UK would be bound by the EU’s trade policy and would probably be required to adhere to a wide range of non-trade EU regulations, both of which are anathema to committed Brexit supporters. Despite the government’s red line against a customs union, this is the option most favoured by businesses and it is gaining political support despite the fact that it faces very strong opposition from Brexit supporters.

More details on the customs union are in our [July Pulse Update](#).

## Current Status

- The government has agreed that any transitional period (currently planned for April 2019 to December 2020) should include continued participation in a customs union.
- For the longer term, the government has made leaving the customs union a red line in negotiations with the EU. However, there is still considerable support within Parliament and the business community for this option, as it avoids most (if not all) new trading costs.
- The government’s White Paper outlines the future relations between the UK and the EU. Key points involved agreeing to maintain a “common rulebook” for all goods and agricultural products and the establishment of a “combined customs territory”, under which the UK would apply its own, possibly lower, tariffs and policies for goods for the domestic market, and EU tariffs and policies for goods entering the EU.
- On jurisdiction, the UK would pay “due regard” to EU case law in respect of the common rulebook, but would not technically be bound by its decisions, nor would the European Court of Justice resolve disputes between the UK and the EU. Free movement would end and be replaced with a “mobility framework”.

## What Do Retailers Need to Do?

- Continued participation in a customs union would require little (if any) mitigation, as trading arrangements between the UK and the EU would remain substantially the same as they are now
- Retail exporters (including e-commerce) to non-EU countries should ensure that preferential access for UK exports to these markets will continue post-Brexit



# Where Are We Now: Most Favoured Nation (MFN)/Hard Brexit



This is alternatively described as “cliff-edge” or “WTO rules”. This is the arrangement that the two sides automatically fall back on if they fail to reach an agreement in the exit negotiations.

This model would result in the most disruption and highest cost outcome for businesses trading with the EU as a result of new tariffs and customs red tape, together with significant disruption to supply chains.

## Current Status

- The MFN/hard Brexit outcome is not the most probable, but it has become more likely. This is because the government has taken considerably longer to reach an agreement concerning its own objectives for EU trade relations and is vulnerable to the demands of the supporters within the Conservative Party for a more ideologically driven desire for a hard Brexit in which the UK is free from the EU. Subsequently, negotiations in Brussels are delayed, thus leaving less time for the two sides to reach an agreement that avoids a default hard Brexit.
- Little concrete progress has been made to extend the EU’s existing trade agreements with the UK after Brexit. If these trade deals are not extended to the UK, then in the event of a hard Brexit, new tariffs would also apply to imports from these countries.

## What Do Retailers Need to Do?

A default hard Brexit would have an instant effect on the cost of trading with EU countries as the result of new customs red tape and new tariffs (product dependent). These new costs would apply from the moment the UK leaves the EU on 29 March 2019. Additionally, goods arriving from the EU via Dover could face severe delays because there is no related customs infrastructure at that port to process trade at present.

To help mitigate these costs, retailers should:

- Review their EU imports to calculate the amount of applicable customs duty for an MFN outcome
- Talk to domestic suppliers to establish reliance on imported components from the EU and the effect an MFN outcome would have on their costs and on supply chain efficiencies
- Identify alternative non-EU sources for goods and relevant tariff rates
- Use existing tools to lower tariff costs; relief from tariffs can be obtained through Inward Processing Relief and Outward Processing Relief
- Be prepared to ask the government to unilaterally lower tariffs on products where there is no domestic/UK supply
- Traders can access simplified customs procedures through AEO status



# Where Are We Now: Free Trade Agreement (FTA)

Many Brexit supporters favour this option as it could deliver tariff-free trade with the EU and allow the UK to pursue an independent trade policy. This option also gives more freedom for the UK to independently regulate in other areas (e.g. environmental protection and consumer protection).

An FTA would involve new customs red tape (e.g. customs declarations and rules of origin) and customs checks on trade between the EU and the UK, which would inevitably lead to new costs on trade with the EU and increase delivery times.

## Current Status

- In March, the EU agreed that Brexit negotiations could progress to discuss trade and the European Commission currently has a mandate to negotiate an FTA with the UK. However, since March, progress has been slow.
- This option is at the heart of the recent White Paper in which the government seeks to combine elements of a customs union with elements of an FTA into what the government is calling a “free trade area”, which encompasses the UK and the EU. This free trade area will be enabled by a “facilitated customs arrangement”, the aim of which is to allow trade in goods between the UK and the EU to continue as present (as if the UK and the EU were still in a customs union), whilst simultaneously allowing the UK to negotiate different terms for trading with other countries.
- The White Paper proposals replace the UK government’s earlier proposals of either a “Customs Partnership” or a “Maximum Facilitation” solution. The main idea of “max-fac” is that the costs and delays (created by new customs red tape) could be reduced through a combination of new technology and simplified administrative procedures. However, it has been generally acknowledged that (1) not all the necessary technology exists yet; and (2) it would require a few years to devise, develop and implement new administrative systems.
- Severe concerns have been expressed regarding how an FTA could work for trade across the Irish land border without breaching Good Friday Agreement conditions.
- It is generally recognised that the earliest any FTA could be implemented will be after the expiry of the currently proposed transition period towards the end of 2020.

## What Do Retailers Need to Do?

- Review supply chains to establish whether imports from the EU would meet preferential rules of origin and, therefore, qualify for duty-free treatment
- Consider applying for trusted trader programmes, such as AEO















# Sector Analysis



# Sector Summary: Brexit and Trade Regulation on Retail Imports

## Characteristics, Risk and Opportunities Across All Possible Outcomes (by Importance of Size)

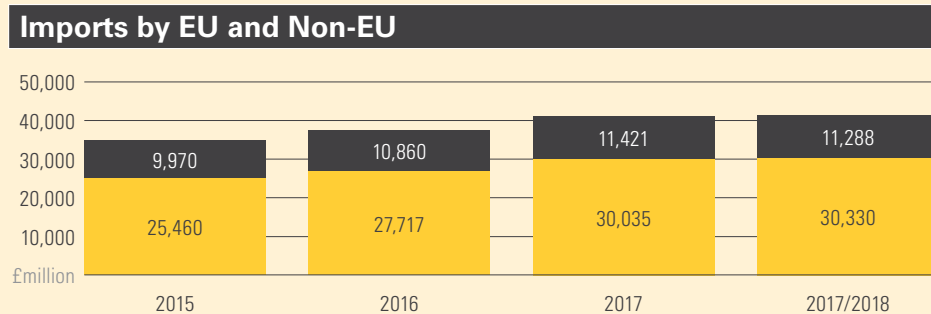
	Trade Characteristics	Risks or Threats	Key Opportunities
<b>Food and Drink</b> 	The EU accounts for 72% of UK imports. Imports from elsewhere face very high tariffs (sometimes in excess of 80%) and non-tariff barriers (e.g. veterinary controls). Some imports benefit from reduced rates through TRQs. Splitting TRQs between the UK and the EU is contentious.	<ul style="list-style-type: none"> <li>Tariffs on imports from the EU could total £6 billion</li> <li>Veterinary controls on imports from the EU</li> <li>Insufficient TRQ allocation for Thailand, Brazil and New Zealand</li> <li>Failure to replicate FTAs with South Africa and Chile</li> <li>New tariffs on imports from US</li> </ul>	<ul style="list-style-type: none"> <li>New TRQs/duty suspensions on food and drink not produced in the UK</li> <li>Improved GSP benefits mean lower tariffs on India</li> <li>New FTA with Vietnam</li> <li>Possible FTA with Brazil</li> <li>New FTA negotiations with New Zealand and Australia</li> </ul>
<b>Electricals</b> 	The EU is the main supplier, followed by China. Many products are already duty-free (especially IT-related). Average duty is only 3.14% (TVs 14%).	<ul style="list-style-type: none"> <li>Tariff on imports from the EU could total £220 million</li> <li>Rules of origin on imports from the EU</li> <li>Turkey loses duty-free access when the UK leaves the customs union</li> </ul>	<ul style="list-style-type: none"> <li>New FTAs with Singapore, Japan and Vietnam</li> </ul>
<b>Health and Beauty</b> 	The EU dominates supply. Most products are already duty-free. Only shaving and deodorants face duties (6.5%).	<ul style="list-style-type: none"> <li>Tariffs on imports from the EU could total £43 million</li> <li>Turkey loses duty-free access when the UK leaves the customs union</li> <li>Failure to replicate the FTA with Switzerland</li> <li>New tariffs on imports from US</li> </ul>	<ul style="list-style-type: none"> <li>New FTA with Japan</li> </ul>
<b>Clothing and Footwear</b> 	UK imports are dominated by developing countries, most of whom enjoy preferential access through GSP. MFN tariff rates are 11-17%.	<ul style="list-style-type: none"> <li>Tariffs on imports from the EU could total £1.1 billion</li> <li>Rules of origin on imports from the EU</li> <li>Turkey loses duty-free access when the UK leaves the customs union</li> </ul>	<ul style="list-style-type: none"> <li>Improved GSP benefits mean lower tariffs for India</li> <li>New FTA with Vietnam</li> </ul>
<b>DIY and Gardening</b> 	The EU dominates supply, followed by China. MFN duties up to 11%, but average only 3.32%.	<ul style="list-style-type: none"> <li>Tariffs on imports from the EU could total £251 million</li> <li>Turkey loses duty-free access when the UK leaves the customs union</li> <li>Failure to replicate the FTA with Norway</li> <li>New tariffs on imports from US</li> </ul>	<ul style="list-style-type: none"> <li>New FTA with Japan</li> <li>Removal of anti-dumping duties on ceramic tiles from China</li> </ul>
<b>Furniture and Flooring</b> 	The EU accounts for almost half of UK imports and China for one-third. Carpets and flooring duties of 8%. Duties on furniture are much lower.	<ul style="list-style-type: none"> <li>Tariffs on imports from the EU could total £133 million</li> <li>Turkey loses duty-free access when the UK leaves the customs union</li> </ul>	<ul style="list-style-type: none"> <li>New FTA with Vietnam</li> </ul>
<b>Sports, Toys and Leisure</b> 	China accounts for half of UK imports. Average duty rates are only 2.52%, but bicycles 15%.	<ul style="list-style-type: none"> <li>Tariffs on imports from the EU could total £28 million</li> <li>Removal of anti-dumping duties on bicycles</li> <li>New tariffs on imports from US</li> </ul>	<ul style="list-style-type: none"> <li>New FTA with Vietnam</li> <li>Removal of anti-dumping duties on bicycles from China and Indonesia</li> </ul>
<b>Homewares</b> 	China is the main supplier. Duty rates vary considerably from product to product. Rates of circa 12% for textiles and ceramics.	<ul style="list-style-type: none"> <li>Tariffs on imports from the EU could total £72 million</li> <li>Turkey loses duty-free access when the UK leaves the customs union</li> <li>New tariffs on imports from US</li> </ul>	<ul style="list-style-type: none"> <li>Removal of anti-dumping duties on ceramic tableware from China</li> <li>New FTA with Vietnam</li> </ul>

# Food and Drink: Key Statistics



<b>Outlook</b> ★★★★★ <ul style="list-style-type: none"> <li>Threat of significant new costs on imports from the EU outside customs union</li> <li>Limited scope for alternative sourcing</li> </ul>	<b>Opportunities</b> ★★★★★ <ul style="list-style-type: none"> <li>New FTAs with Canada and Vietnam</li> <li>Potential new FTA with Mercosur</li> </ul>
<b>Policy Progress</b> ★★★★★ <ul style="list-style-type: none"> <li>Negotiations with the EU have not yet started</li> <li>FTA with Canada now in place</li> <li>FTA with Vietnam to be implemented in 2018</li> <li>FTA with Mercosur (Brazil) in final stages of negotiation</li> </ul>	<b>Possible Outcomes</b> ★★★★★ <ul style="list-style-type: none"> <li>Full customs union</li> <li>Preferential trade agreement</li> <li>MFN rules</li> <li>Facilitated customs arrangement</li> </ul>

Import Statistics				
£million	2015	2016	2017	2017/2018
<b>Total Imports</b>	35,430	38,578	41,456	41,618
<b>EU</b>	25,460	27,717	30,035	30,330
<b>Non-EU</b>	9,970	10,860	11,421	11,288
<b>EU Share</b>	72%	72%	72%	73%

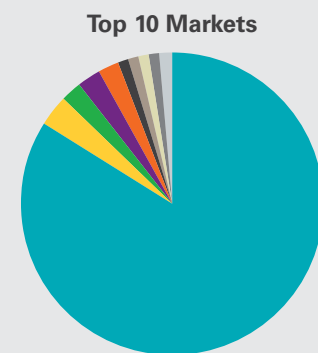


■ EU ■ Non-EU

2017/2018 covers May 2017 to April 2018

## Top 10 Markets

Top 10 Markets in 2017/2018	Imports (£millions)	% of Total Trade
<b>EU</b>	£30,330	73%
<b>US</b>	£1,098	3%
<b>South Africa</b>	£720	2%
<b>Thailand</b>	£676	2%
<b>New Zealand</b>	£624	1%
<b>China</b>	£590	1%
<b>Brazil</b>	£525	1%
<b>Chile</b>	£464	1%
<b>India</b>	£436	1%
<b>Vietnam</b>	£422	1%



\*Does not include the rest of the world

<b>73% EU</b>	<b>1% China</b>
<b>3% US</b>	<b>1% Brazil</b>
<b>2% South Africa</b>	<b>1% Chile</b>
<b>2% Thailand</b>	<b>1% India</b>
<b>2% New Zealand</b>	<b>1% Vietnam</b>

\* The top pie chart is for the top 10 countries. Percentages may not always sum to 100%, as "Rest of World" is treated as "one country". On some pie charts, "Rest of World" is not featured, leaving five under 100%.





Issues	Risk of New Costs	Mitigation	State of Play																																																																		
<p><b>Tariffs</b></p> <p>○ All existing trade in food and drink with the EU is duty-free. In the absence of a negotiated agreement with the EU, imports from the EU will revert to MFN terms as follows:</p> <table border="1"> <thead> <tr> <th>Product</th> <th>Tariff Range</th> <th>Average Weighted Tariff</th> </tr> </thead> <tbody> <tr> <td>Meat/offal</td> <td>0-80%+</td> <td>c.40%</td> </tr> <tr> <td>Fish/seafood</td> <td>0-23%</td> <td>11%</td> </tr> <tr> <td>Dairy, eggs, honey</td> <td>0-80%</td> <td>c.40%</td> </tr> <tr> <td>Vegetables</td> <td>0-15.2%</td> <td>8.7%</td> </tr> <tr> <td>Fruit and nuts</td> <td>0-20.8%</td> <td>6.7%</td> </tr> <tr> <td>Coffee, tea, spices</td> <td>0-12.5%</td> <td>2.8%</td> </tr> <tr> <td>Prepared meat/fish</td> <td>0-26%</td> <td>18.1%</td> </tr> <tr> <td>Sugar/confectionery</td> <td>0-13.4%</td> <td>6.8%</td> </tr> <tr> <td>Cocoa and chocolate</td> <td>0-40%</td> <td>c.30%</td> </tr> <tr> <td>Pasta, doughs, biscuits</td> <td>8.5-12.8%</td> <td>10.7%</td> </tr> </tbody> </table> <p>Even if the UK and the EU agree a new FTA or customs union, some tariffs on food and drink may remain.</p> <p>All the EU's existing FTAs maintain some tariffs on imports of some food and drink. This includes the EU's EEA Agreement with Norway. The EU's Customs Union Agreement with Turkey excludes agricultural products, to which tariffs apply.</p>	Product	Tariff Range	Average Weighted Tariff	Meat/offal	0-80%+	c.40%	Fish/seafood	0-23%	11%	Dairy, eggs, honey	0-80%	c.40%	Vegetables	0-15.2%	8.7%	Fruit and nuts	0-20.8%	6.7%	Coffee, tea, spices	0-12.5%	2.8%	Prepared meat/fish	0-26%	18.1%	Sugar/confectionery	0-13.4%	6.8%	Cocoa and chocolate	0-40%	c.30%	Pasta, doughs, biscuits	8.5-12.8%	10.7%	<p>○ All existing trade in food and drink with the EU is duty-free. In the absence of a negotiated agreement with the EU, imports from the EU will revert to MFN terms as follows:</p> <table border="1"> <thead> <tr> <th>Product</th> <th>Tariff Range</th> <th>Average Weighted Tariff</th> </tr> </thead> <tbody> <tr> <td>Meat/offal</td> <td>0-80%+</td> <td>c.40%</td> </tr> <tr> <td>Fish/seafood</td> <td>0-23%</td> <td>11%</td> </tr> <tr> <td>Dairy, eggs, honey</td> <td>0-80%</td> <td>c.40%</td> </tr> <tr> <td>Vegetables</td> <td>0-15.2%</td> <td>8.7%</td> </tr> <tr> <td>Fruit and nuts</td> <td>0-20.8%</td> <td>6.7%</td> </tr> <tr> <td>Coffee, tea, spices</td> <td>0-12.5%</td> <td>2.8%</td> </tr> <tr> <td>Prepared meat/fish</td> <td>0-26%</td> <td>18.1%</td> </tr> <tr> <td>Sugar/confectionery</td> <td>0-13.4%</td> <td>6.8%</td> </tr> <tr> <td>Cocoa and chocolate</td> <td>0-40%</td> <td>c.30%</td> </tr> <tr> <td>Pasta, doughs, biscuits</td> <td>8.5-12.8%</td> <td>10.7%</td> </tr> </tbody> </table> <p>Even if the UK and the EU agree a new FTA or customs union, some tariffs on food and drink may remain.</p> <p>All the EU's existing FTAs maintain some tariffs on imports of some food and drink. This includes the EU's EEA Agreement with Norway. The EU's Customs Union Agreement with Turkey excludes agricultural products, to which tariffs apply.</p>	Product	Tariff Range	Average Weighted Tariff	Meat/offal	0-80%+	c.40%	Fish/seafood	0-23%	11%	Dairy, eggs, honey	0-80%	c.40%	Vegetables	0-15.2%	8.7%	Fruit and nuts	0-20.8%	6.7%	Coffee, tea, spices	0-12.5%	2.8%	Prepared meat/fish	0-26%	18.1%	Sugar/confectionery	0-13.4%	6.8%	Cocoa and chocolate	0-40%	c.30%	Pasta, doughs, biscuits	8.5-12.8%	10.7%	<p>The UK would be free to lower, temporarily or permanently, its MFN rates of duty.</p> <p>A widespread device used for temporarily reducing tariff rates is a TRQ. TRQs are specified amounts of certain products that may be imported at lower/no duty during a specified time.</p> <p>TRQs normally apply for a calendar year, although some TRQs for seasonal products (e.g. cut flowers) are for shorter periods.</p> <p>Some TRQs are universal and can be used by any supplier; others are specific for certain countries.</p> <p>If a UK/EU trade agreement resulted in tariff restrictions on food and drink imports from the EU, the UK would still be able to use the mitigation mentioned above – suspension of duties/TRQs.</p>	<p>Taxation (Cross-border Trade) Bill due to return to Parliament for final reading in July. Establishes UK MFN regime. (Individual tariff rates established through SI.)</p> <p>The UK has announced that it will transfer, as far as possible, the EU's existing MFN rates. Therefore, permanent reductions to MFN rates are unlikely at least in the short/medium term.</p> <p>Taxation (Cross-border Trade) Bill contains provisions to allow the temporary suspension of MFN tariff rates, including through the establishment of TRQs.</p> <p>Agreement reached at EU Summit in March to open discussions on trade arrangements post-Brexit. However, little or no progress has been made in the last three months, as the UK has still not decided what type of trading arrangement to follow.</p>
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<p><b>Rules of Origin</b></p>	<p>Any FTA between the UK and the EU would be based upon preferential rules of origin. These rules might translate to processed food and drink being non-eligible for preferential tariff treatment.</p>	<p>Not applicable.</p>	<p>UK/EU trade negotiations have not yet started.</p>																																																																		
<p><b>Sanitary and Phytosanitary (SPS) Checks</b></p>	<p>○ Food and drink products from outside the EU must comply with non-trade regulations when they are imported. The most significant of these are veterinary certificates for all animal products.</p> <p>The average cost of complying with veterinary certification is around £350 per container. The bulk of the cost is the storage charge at port pending veterinary approval (£120 per day). The average time for a consignment to clear veterinary checks is two days at the port. Other food and drink products must also demonstrate compliance with other non-food regulations, including pesticide residues and GMOs.</p>	<p>Veterinary checks at ports may be avoided altogether if the UK and the EU agree for the UK to remain within the EU's existing system of veterinary controls. This will mean that enforcement of veterinary controls will take place along the supply chain (as is currently the case for all meat products within the EU), not at the border. This, in turn, will mean that consignments will not have to be held at port pending veterinary approval.</p>																																																																			



Country	Import Treatment	Risk of Tariff Increases	Opportunities for Tariff Reductions	State of Play
<b>US</b>	<ul style="list-style-type: none"> <li>Import regime: MFN</li> <li>White wine, other beverages, fruit and vegetables are the main categories. Average tariffs around 15%</li> <li>TRQs for some fruit</li> <li>Negligible meat and dairy trade</li> </ul>	<p>● High. New duties now in place against imports of some US food and drink. Further tariffs are likely if the US escalates trade dispute further by imposing new tariffs on EU automotive trade.</p> <p>Marginal increase in costs if existing TRQs for fruit are not replicated.</p>	<p>● Moderate. The Taxation (Cross-border Trade) Bill contains provisions to allow temporary suspension of MFN tariff rates.</p> <p>Significant US exports in categories where there is little UK production and where duty suspensions/TRQs may be possible.</p>	<ul style="list-style-type: none"> <li>Taxation (Cross-border Trade) Bill to return to Parliament for final reading in July. Establishes UK MFN regime. (Individual tariff rates established through SI.)</li> <li>26 September 2017: US and other WTO members wrote to the UK and the EU to object to proposals for splitting existing EU TRQs post-Brexit.</li> <li>New EU duties on imports of some food and drink from the US (imposed on 22 June 2018) in retaliation for US duties on steel and aluminium.</li> </ul>
<b>South Africa</b>	<ul style="list-style-type: none"> <li>Import regime: Economic Partnership Agreement (EPA) – an FTA between a group of Southern African states and the EU</li> <li>Fruit is a dominant category. Significant wine exports; EPA reduces tariffs on fruit and removes tariffs on wine</li> </ul>	<p>● Moderate. Failure to replicate the EU/SADC EPA would mean imports from South Africa revert to MFN terms.</p> <p>Renegotiating the SADC is complicated as it involves several countries.</p>	<p>● Moderate. Renegotiation of EPA may provide an opportunity to allow better access for South African wine and fruits.</p> <p>The Taxation (Cross-border Trade) Bill contains provisions to allow temporary suspension of MFN tariff rates.</p>	<ul style="list-style-type: none"> <li>Trade Bill at Committee Stage. Provides authority for the UK to renegotiate existing EU FTAs.</li> <li>Agreement in principle reached in May 2017 with members of the South African Customs Union for EPA to be extended to the UK post-Brexit.</li> </ul>
<b>Thailand</b>	<ul style="list-style-type: none"> <li>Import regime: MFN</li> <li>Prepared chicken accounts for more than half of food/drink imports from Thailand; TRQ for Thailand reduces tariff from €2.67/kg to 10.9%</li> </ul>	<p>● Moderate. Significant increase in tariffs on processed chicken if existing TRQ is not replicated.</p>	<p>● Moderate. The Taxation (Cross-border Trade) Bill contains provisions to allow temporary suspension of MFN tariff rates.</p>	<ul style="list-style-type: none"> <li>Taxation (Cross-border Trade) Bill at Committee Stage. Establishes UK MFN regime. (Individual tariff rates established through SI.)</li> <li>26 September 2017: Thailand and other WTO members wrote to the UK and the EU to object to proposals for splitting existing EU TRQs post-Brexit.</li> </ul>
<b>New Zealand</b>	<ul style="list-style-type: none"> <li>Import regime: MFN</li> <li>Wine and lamb account for the bulk of imports from New Zealand</li> <li>MFN rate for lamb is 12.8% plus €1.71/kg; duty-free TRQ for New Zealand lamb</li> </ul>	<p>● Moderate. Very significant increases in tariffs if existing TRQ on lamb is not replicated.</p>	<p>● Moderate. The Taxation (Cross-border Trade) Bill contains provisions to allow temporary suspension of MFN tariff rates.</p> <p>Significant New Zealand exports of wine where there is little UK production and where duty suspensions/TRQs are possible.</p> <p>Negotiations with the EU on an FTA could result in lower tariffs for NZ food and drink, but agreement would have to be extended to the UK in order for UK importers to benefit.</p>	<ul style="list-style-type: none"> <li>Taxation (Cross-border Trade) Bill at Committee Stage. Establishes UK MFN regime. (Individual tariff rates established through SI.)</li> <li>26 September 2017: New Zealand and other WTO members wrote to the UK and the EU to object to proposals for splitting existing EU TRQs post-Brexit.</li> <li>EU decision on 22 May 2018 to open negotiations with New Zealand for an FTA.</li> <li>New Zealand is one of three priority countries for a UK bilateral FTA. Joint Trade Working Group established.</li> </ul>



# Food and Drink: Non-EU



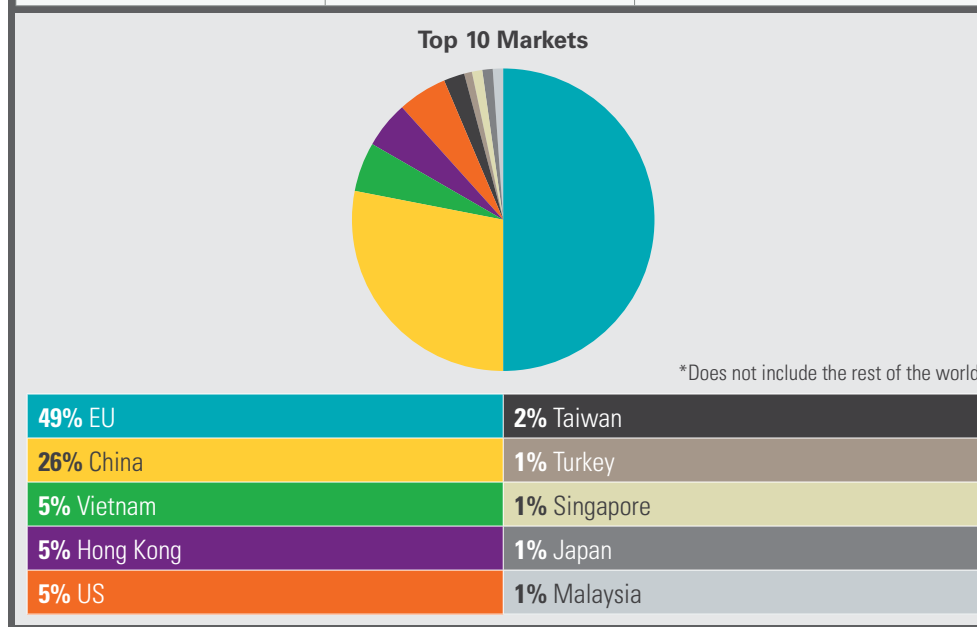
Country	Import Treatment	Risk of Tariff Increases	Opportunities for Tariff Reductions	State of Play
<b>China</b>	<ul style="list-style-type: none"> <li>Import regime: MFN</li> <li>Fish is the most significant category, accounting for more than a third of food and drink imports</li> <li>Tariffs on fish depend upon species; up to 22%, but typically around 15%</li> <li>Other imports spread across food categories; although, no meat imports because China does not have veterinary approval to sell beef, lamb or pork to the UK</li> </ul>	<p>Low. Government announced that UK MFN rates will stay the same post-Brexit.</p>	<p>● Moderate. The Taxation (Cross-border Trade) Bill contains provisions to allow temporary suspension of MFN tariff rates.</p>	<p>Taxation (Cross-border Trade) Bill at Committee Stage. Establishes UK MFN regime. (Individual tariff rates established through SI.)</p>
<b>Brazil</b>	<ul style="list-style-type: none"> <li>Import regime: MFN</li> <li>Meat and meat preparations account for more than half of food and drink imports from Brazil; significant imports of fruit (especially melons and papayas)</li> <li>Corned beef is subject to 16.6% tariff</li> <li>TRQ on prepared chicken reduces tariff from €2.67/kg to 10.9%</li> <li>Melons 8.8% tariff, papayas 0%</li> </ul>	<p>● Moderate. Significant increase in tariffs on processed chicken if existing TRQ is not replicated.</p>	<p>● Moderate to high. The Taxation (Cross-border Trade) Bill contains provisions to allow temporary suspension of MFN tariff rates.</p> <p>EU/Mercosur FTA would significantly reduce tariffs on imports of beef from Brazil, although negotiations between the two sides are stuck on a number of key issues (including access for Brazilian dairy products to EU market).</p>	<ul style="list-style-type: none"> <li>Taxation (Cross-border Trade) Bill at Committee Stage. Establishes UK MFN regime. (Individual tariff rates established through SI.)</li> <li>Mercosur (a trade bloc of Latin American countries, including Brazil) is close to concluding a new FTA with the EU. The main outstanding issue is access to the EU for South American beef.</li> <li>Latest round of EU/Mercosur negotiations in June failed to resolve outstanding differences on market access for dairy products.</li> </ul>
<b>Chile</b>	<ul style="list-style-type: none"> <li>Import regime: EU/Chile FTA</li> <li>Fruit and wine are the dominant categories</li> <li>FTA gives Chile partial reductions in duties on fruit and duty-free access for wine</li> </ul>	<p>● Moderate. Increases in tariffs on wine and fruit if FTA cannot be renegotiated.</p>	<p>Moderate. Renegotiation of FTA may provide an opportunity to allow better access for Chilean fruit.</p> <p>The Taxation (Cross-border Trade) Bill contains provisions to allow temporary suspension of MFN tariff rates.</p>	<p>Trade Bill at Committee Stage. Provides authority for the UK to renegotiate existing EU FTAs.</p>
<b>India</b>	<ul style="list-style-type: none"> <li>Import regime: MFN</li> <li>Wine and lamb account for the bulk of imports from New Zealand</li> <li>MFN rate for lamb is 12.8% plus €1.71/kg; duty-free TRQ for New Zealand lamb</li> </ul>	<p>Low. Government announced that it will seek to maintain at least the same amount of preferential access for developing countries.</p>	<p>● Moderate. Considerable scope to further reduce tariff rates on imports of rice and fish by removing them from the list of "sensitive products" to which duties apply.</p>	<ul style="list-style-type: none"> <li>Taxation (Cross-border Trade) Bill at Committee Stage. Establishes preference scheme for developing countries.</li> <li>Department for Trade and Industry (DTI) currently consulting on areas for improvement to operation of GSP.</li> <li>EU/India FTA negotiations opened in 2007. No progress since 2013.</li> </ul>
<b>Vietnam</b>	<ul style="list-style-type: none"> <li>GSP (transitioning to new FTA in 2018)</li> <li>Seafood, fruit, coffee and spices are the main categories</li> <li>MFN rates for seafood are 12-18%; GSP reduces rate to 5%; coffee is duty-free</li> </ul>	<p>Low. Government announced that it will seek to maintain at least the same amount of preferential access for developing countries.</p>	<p>● High. New EU/Vietnam FTA agreed, awaiting implementation. Tariffs on seafood are to be reduced to 0% over a period of up to six years. Most fruit will be duty-free as soon as the agreement enters into force.</p>	<ul style="list-style-type: none"> <li>Trade Bill at Committee Stage. Provides authority for the UK to renegotiate existing FTAs.</li> <li>Final agreement on text of FTA reached on 22 June 2018. Now awaiting formal approval of agreement from European Parliament and Council.</li> </ul>

# Electricals: Key Statistics

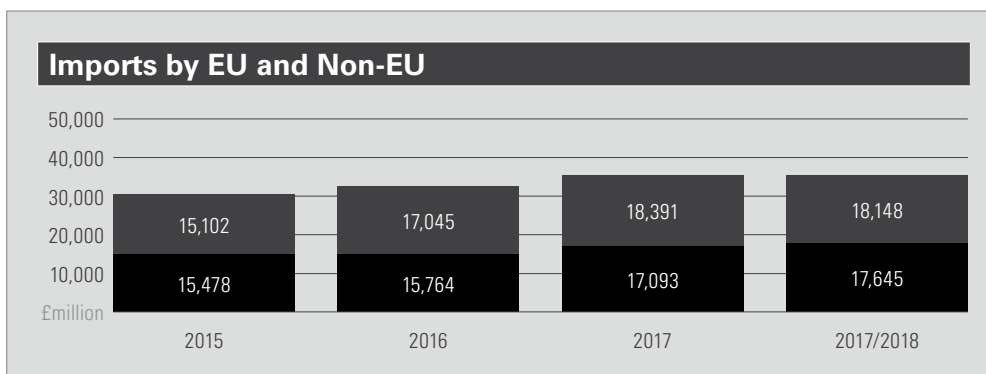


<b>Outlook</b> ★★★★★ <ul style="list-style-type: none"> <li>Risk of cost increases from Turkey</li> <li>Rules of origin on imports from EU increase some costs</li> </ul>	<b>Opportunities</b> ★★★★★ <ul style="list-style-type: none"> <li>Cost reductions on imports from Singapore, Japan and Vietnam</li> </ul>
<b>Policy Progress</b> ★★★★★ <ul style="list-style-type: none"> <li>Negotiations with the EU have not yet started</li> <li>FTAs with Singapore, Japan and Vietnam to be implemented 2018/19</li> </ul>	<b>Possible Outcomes</b> ★★★★★ <ul style="list-style-type: none"> <li>Full customs union</li> <li>Preferential trade agreement</li> <li>MFN rules</li> </ul>

Top 10 Markets		
Top 10 Markets in 2017/2018	Imports (£millions)	% of Total Trade
EU	£17,645	49%
China	£9,302	26%
Vietnam	£1,943	5%
Hong Kong	£1,786	5%
US	£1,655	5%
Taiwan	£813	2%
Turkey	£508	1%
Singapore	£343	1%
Japan	£317	1%
Malaysia	£311	1%



Import Statistics				
£million	2015	2016	2017	2017/2018
<b>Total Imports</b>	30,580	32,809	35,484	35,793
<b>EU</b>	15,478	15,764	17,093	17,645
<b>Non-EU</b>	15,102	17,045	18,391	18,148
<b>EU Share</b>	51%	48%	48%	49%



■ EU ■ Non-EU

2017/2018 covers May 2017 to April 2018





Country	Tariff Regime	Risk of Tariff Increases	Opportunities for Tariff Reductions	State of Play
<b>EU</b>	<ul style="list-style-type: none"> <li>• Customs union</li> <li>• All tariffs: 0%</li> </ul>	<p>○ High. Tariffs revert to MFN levels in the event of no deal. Preferential rules of origin would apply to any UK/EU FTA.</p>	None.	Agreement reached at EU Summit in March to open discussions on trade arrangements post-Brexit. However, little or no progress has been made in the last three months, as the UK has still not decided what type of trading arrangement to follow.
<b>China, Hong Kong, US, Taiwan, Malaysia</b>	<ul style="list-style-type: none"> <li>• MFN</li> <li>• Tariff range: 0-14%</li> <li>• Average tariff: 3.14%</li> </ul>	<p>Very low. Government announced that UK MFN tariff rates will stay the same post-Brexit.</p> <p>New duties of 25% on imports of cooking appliances, fans and air heaters from the US (applied from 22 June 2018).</p>	Low/moderate. The Taxation (Cross-border Trade) Bill contains provisions to allow temporary suspension of MFN tariff rates.	<ul style="list-style-type: none"> <li>• Taxation (Cross-border Trade) Bill at Committee Stage. Establishes UK MFN regime. (Individual tariff rates established through SI.)</li> <li>• The UK and the US held “scoping talks” on a new FTA in July and November 2017.</li> <li>• The UK and Hong Kong established strategic dialogue on a trade partnership in June 2017.</li> <li>• UK/Taiwan trade dialogue has been ongoing since 1991.</li> <li>• EU/Malaysia FTA negotiations opened in 2010, but were put on hold in 2012.</li> </ul>
<b>Vietnam</b>	<ul style="list-style-type: none"> <li>• GSP</li> <li>• Tariff range: 0-9.8%</li> <li>• Average tariff: 2%</li> </ul>	Low. Government announced that it will seek to maintain at least the same level of preferential access for developing countries.	● High. New EU/Vietnam FTA agreed, awaiting implementation. The agreement will reduce electricals tariffs over a period of six years, with many items gaining duty-free status as soon as the agreement is implemented.	<ul style="list-style-type: none"> <li>• Trade Bill at Committee Stage. Provides authority for the UK to renegotiate existing EU FTAs.</li> <li>• Final agreement reached on EU/Vietnam FTA on 22 June 2018. Implementation expected later in 2018.</li> </ul>
<b>Turkey</b>	<ul style="list-style-type: none"> <li>• Customs union</li> <li>• All non-agricultural tariffs: 0%</li> </ul>	<p>○ High. In the absence of a new FTA, imports from Turkey default to MFN terms when the UK leaves the customs union.</p> <p>In the event of a UK/Turkey FTA being agreed, preferential rules of origin would apply.</p>	None.	UK/Turkey Working Group was established in November 2017 to discuss a UK/Turkey FTA.
<b>Singapore</b>	<ul style="list-style-type: none"> <li>• MFN</li> <li>• Tariff range: 0-14%</li> <li>• Average tariff: 3.14%</li> </ul>	Very low. Government announced that UK MFN tariff rates will stay the same post-Brexit.	● High. New EU/Singapore FTA will reduce all electronics tariffs to 0%. Some tariffs will be subject to phased reduction. FTA also includes agreements on standards for electronics.	EU/Singapore FTA agreed in 2014, but has not yet been implemented. Finalised agreement has now been submitted to European Parliament and Council for ratification.
<b>Japan</b>	<ul style="list-style-type: none"> <li>• MFN</li> <li>• Tariff range: 0-14%</li> <li>• Average tariff: 3.14%</li> </ul>	Very low. Government announced that UK MFN tariff rates will stay the same post-Brexit.	● High. EU/Japan FTA will remove all tariffs on electricals; although, some (mainly TV equipment) will be phased out over six years.	<p>EU/Japan FTA agreed in December 2017 and has now been submitted to European Council and Parliament for ratification. Implementation is expected before the end of 2019.</p> <p>The UK and Japan made a joint commitment to replicate the EU/Japan FTA in August 2017.</p>

# Health and Beauty: Key Statistics



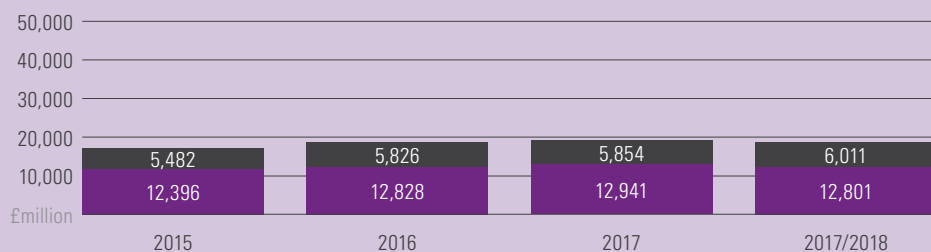
<b>Outlook</b> ★★★★★ <ul style="list-style-type: none"> <li>Sector least affected by Brexit because most products are already duty-free</li> </ul>	<b>Opportunities</b> ★★★★★ <ul style="list-style-type: none"> <li>EU/Japan FTA removes remaining duties on shaving/deodorants</li> </ul>
<b>Policy Progress</b> ★★★★★ <ul style="list-style-type: none"> <li>Negotiations with the EU have not yet started</li> <li>FTA with Japan to be implemented by 2019</li> </ul>	<b>Possible Outcomes</b> ★★★★★ <ul style="list-style-type: none"> <li>Full customs union</li> <li>Preferential trade agreement</li> <li>MFN rules</li> </ul>

Top 10 Markets		
Top 10 Markets in 2017/2018	Imports (£millions)	% of Total Trade
EU	£12,801	68%
Switzerland	£2,985	16%
US	£1,488	8%
China	£490	3%
India	£378	2%
Japan	£106	1%
Canada	£91	0.5%
Australia	£74	0.4%
Turkey	£61	0.3%
Thailand	£47	0.2%

## Import Statistics

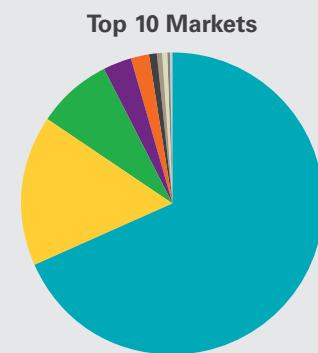
£million	2015	2016	2017	2017/2018
<b>Total Imports</b>	17,877	18,654	18,795	18,812
<b>EU</b>	12,396	12,828	12,941	12,801
<b>Non-EU</b>	5,482	5,826	5,854	6,011
<b>EU Share</b>	69%	69%	69%	68%

## Imports by EU and Non-EU



■ EU ■ Non-EU

2017/2018 covers May 2017 to April 2018



<b>68% EU</b>	<b>1% Japan</b>
<b>16% Switzerland</b>	<b>0.5% Canada</b>
<b>8% US</b>	<b>0.4% Australia</b>
<b>3% China</b>	<b>0.3% Turkey</b>
<b>2% India</b>	<b>0.2% Thailand</b>



# Health and Beauty



Country	Tariff Regime	Risk of Tariff Increases	Opportunities for Tariff Reductions	State of Play
<b>EU</b>	<ul style="list-style-type: none"> <li>• Customs union</li> <li>• All tariffs: 0%</li> </ul>	<p>○ High. Tariffs revert to MFN levels in the event of no deal. Preferential rules of origin would apply to any UK/EU FTA.</p>	None.	Agreement reached at EU Summit in March to open discussions on trade arrangements post-Brexit. However, little or no progress has been made in the last three months, as the UK has still not decided what type of trading arrangement to follow.
<b>Switzerland</b>	<ul style="list-style-type: none"> <li>• EU/Switzerland FTA</li> <li>• All non-agricultural tariffs: 0%</li> </ul>	<p>● Moderate. Failure to extend the existing EU/Switzerland deal post-Brexit would mean imports from Switzerland revert to MFN terms.</p>	None.	<ul style="list-style-type: none"> <li>• Trade Bill at Committee Stage. Provides authority for the UK to renegotiate existing EU FTAs.</li> <li>• Switzerland “wishes to ensure that the existing mutual rights and obligation in its relationship with the UK will continue to apply after the UK leaves the EU”.</li> </ul>
<b>US, China, Australia, Thailand</b>	<ul style="list-style-type: none"> <li>• MFN</li> <li>• Tariff range: 0-6.5%</li> <li>• Average tariff: 1.25%</li> <li>• Most health and beauty goods are duty-free; shaving and deodorants are 6.5%</li> </ul>	<p>Very low. Government announced that UK MFN rates will stay the same post-Brexit.</p> <p>25% additional duties on imports of certain cosmetic preparations from the US (imposed on 22 June 2018).</p>	Low/moderate. The Taxation (Cross-border Trade) Bill contains provisions to allow temporary suspension of MFN tariff rates.	<ul style="list-style-type: none"> <li>• Taxation (Cross-border Trade) Bill at Committee Stage. Establishes UK MFN regime. (Individual tariff rates established through SI.)</li> <li>• The EU and Australia agreed to open negotiations on a new FTA on 22 May 2018.</li> <li>• EU/Thailand FTA negotiations were suspended in 2013.</li> <li>• The UK and the US held “scoping talks” on a new FTA in July and November 2017.</li> </ul>
<b>India</b>	<ul style="list-style-type: none"> <li>• GSP</li> <li>• All health and beauty tariffs: 0%</li> </ul>	<p>Low. Government announced that it will seek to maintain at least the same level of preferential access for developing countries.</p>	None. India already enjoys duty-free access for health and beauty products.	Taxation (Cross-border Trade) Bill at Committee Stage. Establishes duty-free imports from LDCs.
<b>Japan</b>	<ul style="list-style-type: none"> <li>• MFN (transitioning to FTA)</li> <li>• Tariff range: 0-6.5%</li> <li>• Average tariff: 1.25%</li> </ul>	<p>Very low. Government announced that UK MFN rates will stay the same post-Brexit.</p>	● High. EU/Japan FTA will immediately remove all remaining tariffs on health and beauty.	<p>EU/Japan FTA was agreed in December 2017. Implementation is expected before the end of 2019.</p> <p>The UK and Japan made a joint commitment to replicate the EU/Japan FTA in August 2017.</p>
<b>Canada</b>	<ul style="list-style-type: none"> <li>• EU/Canada FTA</li> <li>• All health and beauty tariffs: 0%</li> </ul>	<p>● Moderate. Failure to replicate the EU/Canada deal will mean imports from Canada will revert to MFN rates.</p>	None.	Trade Bill at Committee Stage. Provides authority for the UK to renegotiate existing EU FTAs.
<b>Turkey</b>	<ul style="list-style-type: none"> <li>• Customs union</li> <li>• All non-agricultural tariffs: 0%</li> </ul>	<p>○ High. In the absence of a new FTA, imports from Turkey default to MFN terms when the UK leaves the customs union.</p> <p>In the event of a UK/Turkey FTA being agreed, preferential rules of origin would apply.</p>	None.	UK/Turkey Working Group was established in November 2017 to discuss a UK/Turkey FTA.

# Clothing and Footwear: Key Statistics

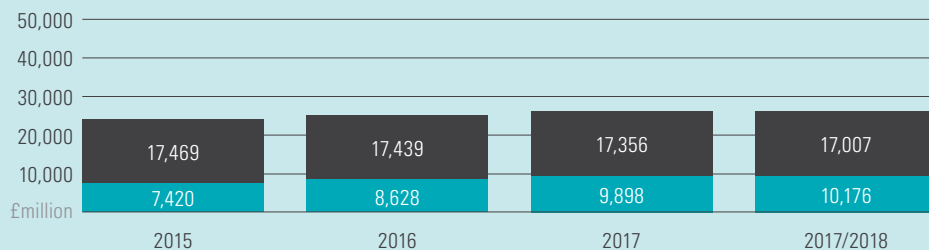


<b>Outlook</b> ★★★★★ <ul style="list-style-type: none"> <li>• Risk of cost increase from Turkey</li> <li>• Costs for other main non-EU suppliers unlikely to change</li> <li>• Rules of origin on imports from EU increase some costs</li> </ul>	<b>Opportunities</b> ★★★★★ <ul style="list-style-type: none"> <li>• Better access for larger developing countries (e.g. India)</li> </ul>
<b>Policy Progress</b> ★★★★★ <ul style="list-style-type: none"> <li>• Negotiations with EU have not yet started</li> <li>• Customs &amp; Trade Bills at Committee Stage</li> </ul>	<b>Possible Outcomes</b> ★★★★★ <ul style="list-style-type: none"> <li>• Full customs union</li> <li>• Preferential trade agreement</li> <li>• MFN rules</li> </ul>

## Import Statistics

£million	2015	2016	2017	2018
<b>Total Imports</b>	24,889	26,067	27,255	27,183
<b>EU</b>	7,420	8,628	9,898	10,176
<b>Non-EU</b>	17,469	17,439	17,356	17,007
<b>EU Share</b>	30%	33%	36%	37%

## Imports by EU and Non-EU



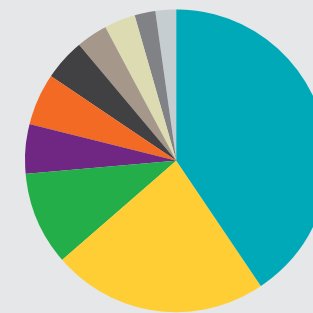
■ EU ■ Non-EU

2017/2018 covers May 2017 to April 2018

## Top 10 Markets

Top 10 Markets in 2017/2018	Imports (£millions)	% of Total Trade
<b>EU</b>	£10,176	37%
<b>China</b>	£5,761	21%
<b>Bangladesh</b>	£2,549	9%
<b>India</b>	£1,487	5%
<b>Turkey</b>	£1,411	5%
<b>Vietnam</b>	£1,005	4%
<b>Cambodia</b>	£861	3%
<b>Hong Kong</b>	£811	3%
<b>Pakistan</b>	£567	2%
<b>Sri Lanka</b>	£544	2%

## Top 10 Markets



\*Does not include the rest of the world

<b>37% EU</b>	<b>4% Vietnam</b>
<b>21% China</b>	<b>3% Cambodia</b>
<b>9% Bangladesh</b>	<b>3% Hong Kong</b>
<b>5% India</b>	<b>2% Pakistan</b>
<b>5% Turkey</b>	<b>2% Sri Lanka</b>

# Clothing and Footwear



Country	Tariff Regime	Risk of Tariff Increases	Opportunities for Tariff Reductions	State of Play
<b>EU</b>	<ul style="list-style-type: none"> <li>• Customs union</li> <li>• All tariffs: 0%</li> </ul>	○ High. Tariffs revert to MFN levels in the event of no deal. Preferential rules of origin would apply to any UK/EU FTA.	None.	Agreement reached at EU Summit in March to open discussions on trade arrangements post-Brexit. However, little or no progress has been made in the last three months, as the UK has still not decided what type of trading arrangement to follow.
<b>China and Hong Kong</b>	<ul style="list-style-type: none"> <li>• MFN</li> <li>• Tariff range: 3-17%</li> <li>• Average tariff: 11.28%</li> </ul>	Very low. Government announced that UK MFN tariff rates will stay the same post-Brexit.	Low to moderate. The Taxation (Cross-border Trade) Bill contains provisions to allow temporary suspension of MFN tariff rates.	<ul style="list-style-type: none"> <li>• Taxation (Cross-border Trade) Bill at Committee Stage. Establishes UK MFN regime. (Individual tariff rates established through SI.)</li> </ul>
<b>India</b>	<ul style="list-style-type: none"> <li>• GSP</li> <li>• Tariff range: 0-13.5%</li> <li>• Average tariff: 9.6%</li> </ul>	Low. Government announced that it will seek to maintain at least the same level of preferential access for developing countries.	● Moderate. Considerable scope to further reduce tariff rates on imports from India by removing clothing and footwear from the list of “sensitive products” to which duties apply.	<ul style="list-style-type: none"> <li>• Taxation (Cross-border Trade) Bill at Committee Stage. Establishes preference scheme for developing countries.</li> <li>• DTI is currently consulting on areas for improvement to operation of GSP.</li> <li>• EU/India FTA negotiations opened in 2007. No progress since 2013.</li> </ul>
<b>Bangladesh and Cambodia</b>	<ul style="list-style-type: none"> <li>• Everything But Arms (EBA)</li> <li>• All tariffs: 0%</li> </ul>	None. Government committed to duty-free imports from all least developed countries (LDCs).	None. Bangladesh and Cambodia already enjoy across-the-board duty-free access to the UK.	Taxation (Cross-border Trade) Bill at Committee Stage. Establishes duty-free imports from LDCs.
<b>Turkey</b>	<ul style="list-style-type: none"> <li>• Customs union</li> <li>• All non-agricultural tariffs: 0%</li> </ul>	○ High. In the absence of a new FTA, imports from Turkey default to MFN terms when the UK leaves the customs union. In the event of a UK/Turkey FTA being agreed, preferential rules of origin would apply.	None.	UK/Turkey Working Group was established in November 2017 to discuss a UK/Turkey FTA.
<b>Vietnam</b>	<ul style="list-style-type: none"> <li>• GSP (transitioning to new FTA in 2018)</li> <li>• Tariff range: 0-13.5%</li> <li>• Average tariff: 9.6%</li> </ul>	Low. Government announced that it will seek to maintain at least the same level of preferential access for developing countries.	● High. New EU/Vietnam FTA agreed, awaiting implementation. The agreement will reduce clothing and footwear tariffs over a period of eight years.	Trade Bill at Committee Stage. Provides authority for the UK to renegotiate existing EU FTAs.
<b>Sri Lanka and Pakistan</b>	<ul style="list-style-type: none"> <li>• GSP+</li> <li>• All clothing and footwear tariffs: 0%</li> </ul>	Low. Government announced that it will seek to maintain at least the same level of preferential access for developing countries.	Low. Sri Lanka and Pakistan already receive duty-free access for all clothing and footwear. Potential improvements to access through more relaxed rules of origin.	Taxation (Cross-border Trade) Bill at Committee Stage. Provides for differentiated treatment for developing countries based upon compliance with non-trade rules (i.e. similar criteria to existing GSP+ regime).



# DIY and Gardening: Key Statistics



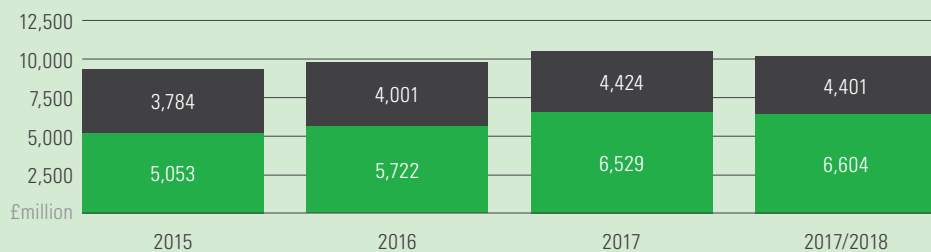
<b>Outlook</b> ★★★★★ <ul style="list-style-type: none"> <li>• Most non-EU sources likely to be unaffected by Brexit outcome</li> <li>• Most tariffs already quite low</li> </ul>	<b>Opportunities</b> ★★★★★ <ul style="list-style-type: none"> <li>• Removal of anti-dumping duties on ceramic tiles</li> </ul>
<b>Policy Progress</b> ★★★★★ <ul style="list-style-type: none"> <li>• Negotiations with EU have not yet started</li> <li>• DIT consulting on extension of existing anti-dumping measures</li> </ul>	<b>Possible Outcomes</b> ★★★★★ <ul style="list-style-type: none"> <li>• Full customs union</li> <li>• Preferential trade agreement</li> <li>• MFN rules</li> </ul>

Top 10 Markets		
Top 10 Markets in 2017/2018	Imports (£millions)	% of Total Trade
EU	£6,604	60%
China	£1,579	14%
US	£667	6%
India	£327	3%
Taiwan	£254	2%
Turkey	£215	2%
Japan	£167	2%
Hong Kong	£167	2%
Norway	£119	1%
Malaysia	£85	1%

## Import Statistics

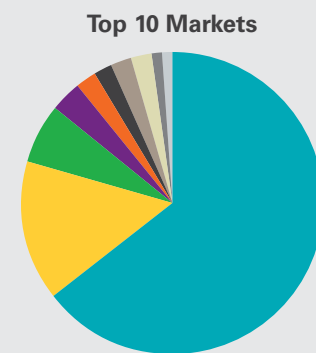
£million	2015	2016	2017	2017/2018
<b>Total Imports</b>	8,837	9,723	10,953	11,005
<b>EU</b>	5,053	5,722	6,529	6,604
<b>Non-EU</b>	3,784	4,001	4,424	4,401
<b>EU Share</b>	57%	59%	60%	60%

## Imports by EU and Non-EU



■ EU ■ Non-EU

2017/2018 covers May 2017 to April 2018



\*Does not include the rest of the world

<b>60% EU</b>	<b>2% Turkey</b>
<b>14% China</b>	<b>2% Japan</b>
<b>6% US</b>	<b>2% Hong Kong</b>
<b>3% India</b>	<b>1% Norway</b>
<b>2% Taiwan</b>	<b>1% Malaysia</b>

# DIY and Gardening



Country	Tariff Regime	Risk of Tariff Increases	Opportunities for Tariff Reductions	State of Play
<b>EU</b>	<ul style="list-style-type: none"> <li>• Customs union</li> <li>• No tariffs</li> </ul>	<p>○ High. Tariffs revert to MFN levels in the event of no deal. Preferential rules of origin would apply to any UK/EU FTA.</p>	None.	Agreement reached at EU Summit in March to open discussions on trade arrangements post-Brexit. However, little or no progress has been made in the last three months, as the UK has still not decided what type of trading arrangement to follow.
<b>China</b>	<ul style="list-style-type: none"> <li>• MFN</li> <li>• Tariff range: 0-10.9%</li> <li>• Average tariff: 3.32%</li> <li>• Anti-dumping duties on ceramic tiles: 30-69.7%</li> </ul>	Very low. Government announced that UK MFN rates will stay the same post-Brexit.	<p>● Moderate to high. The UK is to review all existing anti-dumping measures. This may lead to removal or reduction in duties on ceramic tiles.</p> <p>The Taxation (Cross-border Trade) Bill contains provisions to allow temporary suspension of MFN tariff rates.</p>	<ul style="list-style-type: none"> <li>• Taxation (Cross-border Trade) Bill at Committee Stage. Establishes UK MFN regime. (Individual tariff rates established through SI.)</li> <li>• The Trade Bill establishes Trade Remedies Authority responsible for anti-dumping measures.</li> <li>• Consultation on existing anti-dumping measures are not yet started.</li> </ul>
<b>US, Taiwan, Hong Kong, Malaysia</b>	<ul style="list-style-type: none"> <li>• MFN</li> <li>• Tariff range: 0-10.9%</li> <li>• Average tariff: 3.32%</li> </ul>	<p>Very low. Government announced that UK MFN rates will stay the same post-Brexit.</p> <p>Some DIY products (e.g. screws, ladders) from the US are subject to additional duties of 25% from 22 June 2018.</p>	Low to moderate. The Taxation (Cross-border Trade) Bill contains provisions to allow temporary suspension of MFN tariff rates.	<ul style="list-style-type: none"> <li>• Taxation (Cross-border Trade) Bill at Committee Stage. Establishes UK MFN regime. (Individual tariff rates established through SI.)</li> <li>• EU/Malaysia FTA negotiations opened in 2010. No progress since 2012.</li> <li>• The UK and the US held “scoping talks” on a new FTA in July and November 2017.</li> <li>• The UK and Hong Kong established strategic dialogue on a trade partnership in June 2017.</li> <li>• UK/Taiwan trade dialogue has been ongoing since 1991.</li> </ul>
<b>India</b>	<ul style="list-style-type: none"> <li>• GSP</li> <li>• Tariff range: 0-7.4%</li> <li>• Average tariff: 1.5%</li> </ul>	Low. Government announced that it will seek to maintain at least the same level of preferential access for developing countries.	Low to moderate. Many DIY and gardening products are already duty-free. Some scope for further reduction by removing DIY and gardening products from the list of “sensitive products” to which duties apply.	Taxation (Cross-border Trade) Bill at Committee Stage. Establishes preference scheme for developing countries.
<b>Turkey</b>	<ul style="list-style-type: none"> <li>• Customs union</li> <li>• All non-agricultural tariffs: 0%</li> <li>• 0% on horticultural and cut flowers</li> </ul>	<p>○ High. In the absence of a new FTA, imports from Turkey default to MFN terms when the UK leaves the customs union.</p> <p>In the event of a UK/Turkey FTA being agreed, preferential rules of origin would apply.</p>	None.	UK/Turkey Working Group was established in November 2017 to discuss a UK/Turkey FTA.
<b>Japan</b>	<ul style="list-style-type: none"> <li>• MFN (transitioning to FTA)</li> <li>• Tariff range: 0-10.9%</li> <li>• Average tariff: 3.32%</li> </ul>	Very low. Government announced that UK MFN rates will stay the same post-Brexit.	<p>● High. EU/Japan FTA will remove immediately all remaining tariffs on DIY and gardening products.</p>	<ul style="list-style-type: none"> <li>• EU/Japan FTA was agreed in December 2017. Implementation is expected before the end of 2019.</li> <li>• The UK and Japan made a joint commitment to replicate the EU/Japan FTA in August 2017.</li> </ul>
<b>Norway</b>	<ul style="list-style-type: none"> <li>• EEA (Single Market)</li> <li>• All non-agricultural tariffs: 0%</li> </ul>	<p>○ Moderate to high. Future free trade with Norway would require a new FTA or membership of EFTA.</p>	None.	

# Furniture and Flooring: Key Statistics



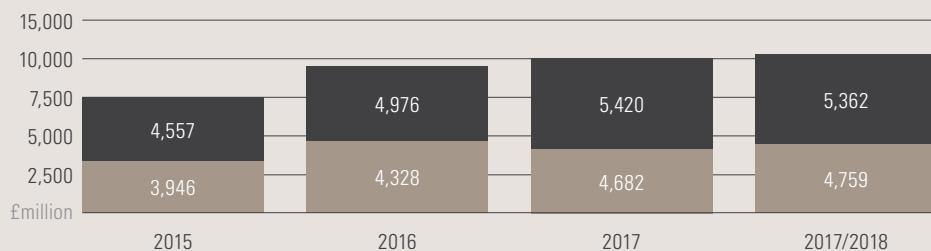
<b>Outlook</b> ★★★★★ <ul style="list-style-type: none"> <li>Furniture subject to low duties and unlikely to be significantly affected by Brexit</li> <li>Carpets/flooring more at risk</li> </ul>	<b>Opportunities</b> ★★★★★ <ul style="list-style-type: none"> <li>Lower duties on imports of carpets from Indonesia and India</li> <li>Lower duties from Vietnam as a result of new FTA</li> </ul>
<b>Policy Progress</b> ★★★★★ <ul style="list-style-type: none"> <li>Negotiations with EU have not yet started</li> <li>FTA with Vietnam to be implemented 2018</li> </ul>	<b>Possible Outcomes</b> ★★★★★ <ul style="list-style-type: none"> <li>Full customs union</li> <li>Preferential trade agreement</li> <li>MFN rules</li> </ul>

Top 10 Markets		
Top 10 Markets in 2017/2018	Imports (£millions)	% of Total Trade
EU	£4,759	47%
China	£3,252	32%
US	£430	4%
Vietnam	£279	3%
Turkey	£170	2%
India	£165	2%
Hong Kong	£121	1.2%
Malaysia	£117	1.2%
Taiwan	£71	0.7%
Canada	£65	0.6%

## Import Statistics

£million	2015	2016	2017	2017/2018
<b>Total Imports</b>	8,503	9,304	10,102	10,121
<b>EU</b>	3,946	4,328	4,682	4,759
<b>Non-EU</b>	4,557	4,976	5,420	5,362
<b>EU Share</b>	46%	47%	46%	47%

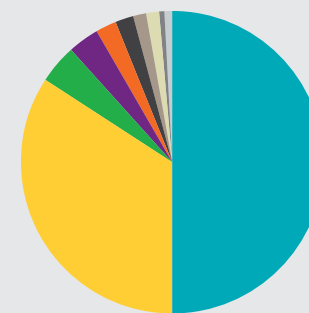
## Imports by EU and Non-EU



■ EU ■ Non-EU

2017/2018 covers May 2017 to April 2018

## Top 10 Markets



\*Does not include the rest of the world

<b>47% EU</b>	<b>2% India</b>
<b>32% China</b>	<b>1.2% Hong Kong</b>
<b>4% US</b>	<b>1.2% Malaysia</b>
<b>3% Vietnam</b>	<b>0.7% Taiwan</b>
<b>2% Turkey</b>	<b>0.6% Canada</b>



# Furniture and Flooring



Country	Tariff Regime	Risk of Tariff Increases	Opportunities for Tariff Reductions	State of Play
EU	<ul style="list-style-type: none"> <li>• Customs union</li> <li>• All tariffs: 0%</li> </ul>	<p>○ High. Tariffs revert to MFN levels in the event of no deal. Preferential rules of origin would apply to any UK/EU FTA.</p>	None.	Agreement reached at EU Summit in March to open discussions on trade arrangements post-Brexit. However, little or no progress has been made in the last three months, as the UK has still not decided what type of trading arrangement to follow.
China, Hong Kong, US, Taiwan, Malaysia	<ul style="list-style-type: none"> <li>• MFN</li> <li>• Tariff range: 0-8%</li> <li>• Average tariff: 4.13%</li> <li>• Carpets and flooring attract consistently higher tariff rates (8%) than other furniture</li> </ul>	Very low. Government announced that UK MFN tariff rates will stay the same post-Brexit.	Low to moderate. The Taxation (Cross-border Trade) Bill contains provisions to allow temporary suspension of MFN tariff rates.	<ul style="list-style-type: none"> <li>• Taxation (Cross-border Trade) Bill at Committee Stage. Establishes UK MFN regime. (Individual tariff rates established through SI.)</li> <li>• The UK and the US held “scoping talks” on a new FTA in July and November 2017.</li> <li>• The UK and Hong Kong established strategic dialogue on a trade partnership in June 2017.</li> <li>• UK/Taiwan trade dialogue has been ongoing since 1991.</li> <li>• EU/Malaysia FTA negotiations opened in 2010, but were put on hold in 2012.</li> </ul>
Vietnam	<ul style="list-style-type: none"> <li>• GSP</li> <li>• Tariff range: 0-6.4%</li> <li>• Average tariff: 3.5%</li> <li>• Most furniture is duty-free</li> </ul>	Low. Government announced that it will seek to maintain at least the same level of preferential access for developing countries.	● High. New EU/Vietnam FTA agreed, awaiting implementation. When implemented, the agreement will immediately remove almost all tariffs on carpets and furniture.	<ul style="list-style-type: none"> <li>• Implementation of an EU/Vietnam agreement is expected in 2018.</li> <li>• Trade Bill at Committee Stage. Provides authority for the UK to renegotiate existing EU FTAs.</li> </ul>
India and Indonesia	<ul style="list-style-type: none"> <li>• GSP</li> <li>• Tariff range: 0-6.4%</li> <li>• Average tariff: 3.5%</li> <li>• Most furniture is duty-free</li> </ul>	Low. Government announced that it will seek to maintain at least the same level of preferential access for developing countries.	● Moderate. India and Indonesia would benefit from any decision to remove carpets and flooring from the list of “sensitive” products to which tariffs apply.	<ul style="list-style-type: none"> <li>• Taxation (Cross-border Trade) Bill at Committee Stage. Establishes legal basis for granting tariff preferences to developing countries.</li> <li>• EU/India FTA negotiations opened in 2007, but have made little progress in the last five years.</li> <li>• EU/Indonesia FTA negotiations opened in July 2016. Relatively slow progress.</li> </ul>
Turkey	<ul style="list-style-type: none"> <li>• Customs union</li> <li>• All non-agricultural tariffs: 0%</li> </ul>	<p>○ High. In the absence of a new FTA, imports from Turkey default to MFN terms when the UK leaves the customs union. In the event of a UK/Turkey FTA being agreed, preferential rules of origin would apply.</p>	None.	UK/Turkey Working Group was established in November 2017 to discuss a UK/Turkey FTA.
Canada	<ul style="list-style-type: none"> <li>• FTA</li> <li>• Tariff rates for all furniture and flooring now: 0%</li> </ul>	High. In the absence of an agreement to extend EU/Canada FTA to the UK, tariffs would revert to MFN levels.		Canada replaces Indonesia as a top 10 supplier of furniture and flooring to the EU.

# Sports, Toys and Leisure: Key Statistics



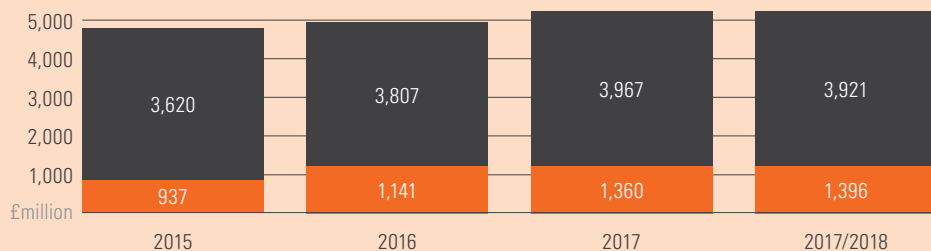
<b>Outlook</b> ★★★★★ <ul style="list-style-type: none"> <li>Impact of Brexit limited for most products because tariffs are already low</li> <li>Bicycles are the exception</li> </ul>	<b>Opportunities</b> ★★★★★ <ul style="list-style-type: none"> <li>Removal of anti-dumping duties on imports of bicycles from China and Indonesia</li> <li>Canada and Vietnam FTAs to progressively lower duties on sports toys and leisure</li> </ul>
<b>Policy Progress</b> ★★★★★ <ul style="list-style-type: none"> <li>Negotiations with EU have not yet started</li> <li>Canada FTA in place</li> <li>Vietnam FTA implemented in 2018</li> <li>DIT consulting on extension of existing EU anti-dumping measures</li> </ul>	<b>Possible Outcomes</b> ★★★★★ <ul style="list-style-type: none"> <li>Full customs union</li> <li>Preferential trade agreement</li> <li>MFN rules</li> </ul>

Top 10 Markets		
Top 10 Markets in 2017/2018	Imports (£millions)	% of Total Trade
EU	£1,396	26%
China	£2,620	49%
Hong Kong	£312	6%
US	£269	5%
Vietnam	£166	3%
Taiwan	£153	3%
India	£43	1%
Indonesia	£41	1%
Thailand	£38	1%
Canada	£33	1%

## Import Statistics

£million	2015	2016	2017	2017/2018
<b>Total Imports</b>	4,557	4,948	5,328	5,317
<b>EU</b>	937	1,141	1,360	1,396
<b>Non-EU</b>	3,620	3,807	3,967	3,921
<b>EU Share</b>	21%	23%	26%	26%

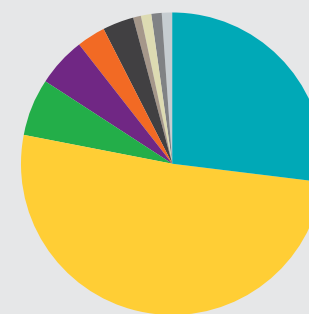
## Imports by EU and Non-EU



■ EU ■ Non-EU

2017/2018 covers May 2017 to April 2018

## Top 10 Markets



\*Does not include the rest of the world

<b>26% EU</b>	<b>3% Taiwan</b>
<b>49% China</b>	<b>1% India</b>
<b>6% Hong Kong</b>	<b>1% Indonesia</b>
<b>5% US</b>	<b>1% Thailand</b>
<b>3% Vietnam</b>	<b>1% Canada</b>

# Sports, Toys and Leisure



Country	Tariff Regime	Risk of Tariff Increases	Opportunities for Tariff Reductions	State of Play
<b>EU</b>	<ul style="list-style-type: none"> <li>• Customs union</li> <li>• No tariffs</li> </ul>	<p>⊖ High. Tariffs revert to MFN levels in the event of no deal. Preferential rules of origin would apply to any UK/EU FTA.</p>	None.	Agreement reached at EU Summit in March to open discussions on trade arrangements post-Brexit. However, little or no progress has been made in the last three months, as the UK has still not decided what type of trading arrangement to follow.
<b>China</b>	<ul style="list-style-type: none"> <li>• MFN</li> <li>• Tariff range: 0-15%</li> <li>• Average tariff: 2.52%</li> <li>• Anti-dumping duties on bicycles up to 48.5%</li> </ul>	Very low. Government announced that UK MFN tariff rates will stay the same post-Brexit.	<p>● Moderate to high. The UK is to review all existing EU anti-dumping measures. This may lead to removal of anti-dumping duties on bicycles. The Taxation (Cross-border Trade) Bill contains provisions to allow temporary suspension of MFN tariff rates.</p>	<ul style="list-style-type: none"> <li>• Taxation (Cross-border Trade) Bill at Committee Stage. Establishes UK MFN regime. (Individual tariff rates established through SI.) The Bill establishes Trade Remedies Authority responsible for anti-dumping measures.</li> <li>• Consultation on maintaining existing anti-dumping measures has not yet started.</li> </ul>
<b>Hong Kong, US, Taiwan, Thailand</b>	<ul style="list-style-type: none"> <li>• MFN</li> <li>• Tariff range: 0-15%</li> <li>• Average tariff: 2.52%</li> </ul>	<p>Very low. Government announced that UK MFN tariff rates will stay the same post-Brexit. Additional duties of 10% on imports of playing cards from the US from 22 June 2018.</p>	Low to moderate. The Taxation (Cross-border Trade) Bill contains provisions to allow temporary suspension of MFN tariff rates.	<ul style="list-style-type: none"> <li>• Taxation (Cross-border Trade) Bill at Committee Stage. Establishes UK MFN regime. (Individual tariff rates established through SI.)</li> <li>• EU/Thailand FTA negotiations were suspended in 2013.</li> <li>• The UK and the US held “scoping talks” on a new FTA in July and November 2017.</li> <li>• The UK and Hong Kong established strategic dialogue on a trade partnership in June 2017.</li> <li>• UK/Taiwan trade dialogue has been ongoing since 1991.</li> </ul>
<b>Vietnam</b>	<ul style="list-style-type: none"> <li>• GSP</li> <li>• Tariff range: 0-10.5%</li> <li>• Average tariff: 2%</li> </ul>	Low. Government announced that it will seek to maintain at least the same level of preferential access for developing countries.	<p>● High. New EU/Vietnam FTA agreed, awaiting implementation. This will reduce tariffs on bicycles over a period of six years. All other toys, sports and games will receive duty-free treatment immediately.</p>	<ul style="list-style-type: none"> <li>• Implementation of an EU/Vietnam agreement is expected in 2018.</li> <li>• Trade Bill at Committee Stage. Provides authority for the UK to renegotiate existing EU FTAs.</li> </ul>
<b>India and Indonesia</b>	<ul style="list-style-type: none"> <li>• GSP</li> <li>• Tariff range: 0-10.5%</li> <li>• Average tariff: 2%</li> <li>• Anti-dumping duties on bicycles from Indonesia up to 48.5%</li> </ul>	Low. Government announced that it will seek to maintain at least the same level of preferential access for developing countries.	<p>Moderate. Most toys, games and sports equipment are already duty-free under GSP regime. The UK is to review all existing EU anti-dumping measures. This may lead to removal of anti-dumping duties on bicycles from Indonesia. Scope for further reduction on tariff rates from India and Indonesia by removing bicycles from the list of sensitive products to which duties apply.</p>	Taxation (Cross-border Trade) Bill at Committee Stage. Establishes preference scheme for developing countries. The Bill establishes Trade Remedies Authority responsible for anti-dumping measures.
<b>Canada</b>	<ul style="list-style-type: none"> <li>• EU/Canada FTA</li> <li>• All sports and leisure tariffs: 0%</li> </ul>	<p>● Moderate. Failure to replicate the EU/Canada deal will mean imports from Canada will revert to MFN rates.</p>	None.	<ul style="list-style-type: none"> <li>• Trade Bill at Committee Stage. Provides authority for the UK to renegotiate existing EU FTAs.</li> <li>• UK Canada Trade Working Group established.</li> </ul>





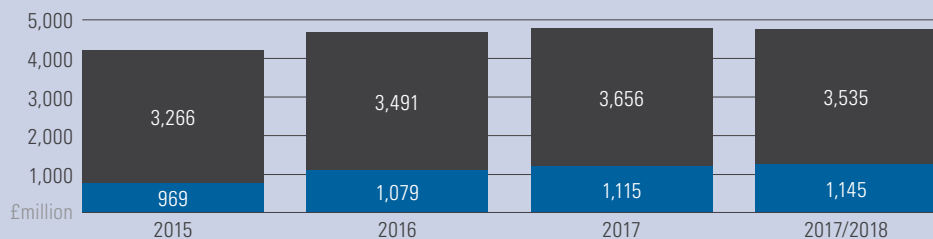
<b>Outlook</b> ★★★★★ <ul style="list-style-type: none"> <li>Impact will vary from product to product according to rate of duty</li> <li>Risk of cost increases from Turkey</li> </ul>	<b>Opportunities</b> ★★★★★ <ul style="list-style-type: none"> <li>Removal of anti-dumping duties on ceramic tableware</li> <li>Tariff reductions on household linens from India</li> </ul>
<b>Policy Progress</b> ★★★★★ <ul style="list-style-type: none"> <li>Negotiations with EU have not yet started</li> <li>Customs and Trade Bills at Committee Stage</li> <li>DIT consulting on extension of existing anti-dumping measures</li> </ul>	<b>Possible Outcomes</b> ★★★★★ <ul style="list-style-type: none"> <li>Full customs union</li> <li>Preferential trade agreement</li> <li>MFN rules</li> </ul>

Top 10 Markets		
Top 10 Markets in 2017/2018	Imports (£millions)	% of Total Trade
EU	£1,145	24%
China	£2,144	46%
Pakistan	£381	8%
India	£253	5%
US	£169	4%
Turkey	£118	3%
Hong Kong	£89	2%
Bangladesh	£55	1%
Vietnam	£49	1%
Taiwan	£42	1%

### Import Statistics

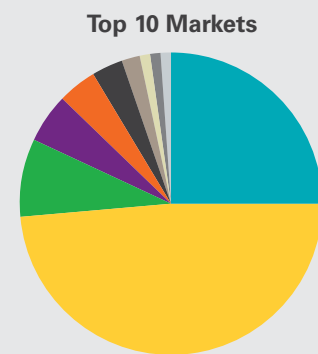
£million	2015	2016	2017	2017/2018
<b>Total Imports</b>	4,235	4,570	4,771	4,680
<b>EU</b>	969	1,079	1,115	1,145
<b>Non-EU</b>	3,266	3,491	3,656	3,535
<b>EU Share</b>	23%	24%	23%	24%

### Imports by EU and Non-EU



■ EU ■ Non-EU

2017/2018 covers May 2017 to April 2018



\*Does not include the rest of the world

24% EU	3% Turkey
46% China	2% Hong Kong
8% Pakistan	1% Bangladesh
5% India	1% Vietnam
4% US	1% Taiwan



Country	Tariff Regime	Risk of Tariff Increases	Opportunities for Tariff Reductions	State of Play
<b>EU</b>	<ul style="list-style-type: none"> <li>• Customs union</li> <li>• No tariffs</li> </ul>	<p>○ High. Tariffs revert to MFN levels in the event of no deal. Preferential rules of origin would apply to any UK/EU FTA.</p>	None.	Agreement reached at EU Summit in March to open discussions on trade arrangements post-Brexit. However, little or no progress has been made in the last three months, as the UK has still not decided what type of trading arrangement to follow.
<b>China</b>	<ul style="list-style-type: none"> <li>• MFN</li> <li>• Tariff range: 0-12%</li> <li>• Average tariff: 8.52%</li> <li>• Anti-dumping duties up to 36.1% on ceramic tableware</li> </ul>	Very low. Government announced that UK MFN tariff rates will stay the same post-Brexit.	<p>● Moderate to high. The UK is to review all existing EU anti-dumping measures. This may lead to removal or reduction in duties on ceramic tableware.</p> <p>The Taxation (Cross-border Trade) Bill contains provisions to allow temporary suspension of MFN tariff rates.</p>	<ul style="list-style-type: none"> <li>• Taxation (Cross-border Trade) Bill at Committee Stage. Establishes UK MFN regime. (Individual tariff rates established through SI.)</li> <li>• Trade Bill establishes Trade Remedies Authority responsible for anti-dumping measures.</li> <li>• Consultation on existing anti-dumping measures has not yet started.</li> </ul>
<b>Pakistan</b>	<ul style="list-style-type: none"> <li>• GSP+</li> <li>• All homeware tariffs: 0%</li> </ul>	Low. Government announced that it will seek to maintain at least the same level of preferential access for developing countries.	None.	<ul style="list-style-type: none"> <li>• Taxation (Cross-border Trade) Bill at Committee Stage. Establishes preference scheme for developing countries.</li> <li>• DTI is currently consulting on areas for improvement to operation of GSP.</li> </ul>
<b>India</b>	<ul style="list-style-type: none"> <li>• GSP</li> <li>• Tariff range: 0-9.6%</li> <li>• Average tariff: 6%</li> </ul>	Low. Government announced that it will seek to maintain at least the same level of preferential access for developing countries.	<p>● Moderate. Considerable scope to further reduce tariff rates by removing bed/table linen and ceramic tableware from the list of GSP “sensitive products” to which duties apply.</p>	<ul style="list-style-type: none"> <li>• Taxation (Cross-border Trade) Bill at Committee Stage. Establishes duty-free imports from LDCs.</li> <li>• EU/India FTA negotiations opened in 2007. No progress since 2013.</li> </ul>
<b>US, Hong Kong, Taiwan</b>	<ul style="list-style-type: none"> <li>• MFN</li> <li>• Tariff range: 0-12%</li> <li>• Average tariff: 8.52%</li> </ul>	<p>Very low. Government announced that UK MFN tariff rates will stay the same post-Brexit.</p> <p>25% additional duties on a wide range of homewares from the US (applied from 22 June 2018).</p>	Low to moderate. The Taxation (Cross-border Trade) Bill contains provisions to allow temporary suspension of MFN tariff rates.	<ul style="list-style-type: none"> <li>• Taxation (Cross-border Trade) Bill at Committee Stage. Establishes UK MFN regime. (Individual tariff rates established through SI.)</li> <li>• The US and the UK held “scoping talks” on a new FTA in July and November 2017.</li> <li>• The UK and Hong Kong established strategic dialogue on a trade partnership in June 2017.</li> <li>• UK/Taiwan trade dialogue has been ongoing since 1991.</li> </ul>
<b>Turkey</b>	<ul style="list-style-type: none"> <li>• Customs union</li> <li>• All non-agricultural tariffs: 0%</li> </ul>	<p>○ High. In the absence of a new FTA, imports from Turkey default to MFN terms when the UK leaves the customs union.</p> <p>In the event of a UK/Turkey FTA being agreed, preferential rules of origin would apply.</p>	None.	UK/Turkey Working Group was established in November 2017 to discuss a UK/Turkey FTA.
<b>Bangladesh</b>	<ul style="list-style-type: none"> <li>• Everything But Arms (EBA)</li> <li>• All tariff: 0</li> </ul>	None. Government committed to duty-free imports from all LDCs.	None.	Taxation (Cross-border Trade) Bill at Committee Stage. Establishes duty-free imports from LDCs.
<b>Vietnam</b>	<ul style="list-style-type: none"> <li>• GSP (transitioning to FTA)</li> <li>• Tariff range: 0-9.6%</li> <li>• Average tariff: 6%</li> </ul>	Low. Government announced that it will seek to maintain at least the same level of preferential access for developing countries.	<p>● High. New EU/Vietnam FTA agreed, awaiting implementation. The agreement will remove tariffs on homewares over a period of six years.</p>	<ul style="list-style-type: none"> <li>• Trade Bill at Committee Stage. Provides authority for the UK to renegotiate existing EU FTAs.</li> <li>• UK/Vietnam trade consultations were on 4 December 2017.</li> </ul>

# About Us: Report Authors

## About Squire Patton Boggs

With more than 1,500 lawyers and an industry-leading Public Policy team, we have decades of experience to support our clients through this legal and political uncertainty. Our global Retail and Brands & Consumer Products teams have a proven track record advising across the spectrum, including supermarkets, department stores, fashion houses, global health and beauty brands, manufacturers, distributors, logistics operators, technology businesses, property developers, landlords and investors.

Our Brexit and International Trade expert team includes former members of the UK Parliament, former Office of the US Trade Representative, members of the European Parliament and senior regulators, as well as European Free Trade Association officials, former ambassadors and national government ministers. They work collaboratively with our legal practitioners who master all relevant areas of law likely to be affected by Brexit, such as international trade, regulated industries (e.g. financial services), immigration, labour and employment, tax and competition.

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## About Retail Economics

Retail Economics is an independent economics research consultancy focused on the UK consumer and retail industry. Our subscription service provides unbiased research and analysis on the key economic and social drivers behind the UK retail sector, helping to inform critical business decisions and giving you a competitive edge through deeper insights.

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## Other UK Retail Brexit Trade Service Resources

- March 18 – [1st Quarterly UK Retail Brexit Trade Review](#)
- May 18 – [Pulse Update: Transition and What It Means for Retailers](#)
- June 18 – [How Do You, Your Suppliers and Customers Fare as Trade Tensions Escalate?](#)
- July 18 – [Pulse Update: Post Chequers Analysis](#)
- [Brexit Legal Blog](#)





