

# Uneven vulnerabilities: Challenges and opportunities for the UK and devolved agricultural sector

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### Key Points

- Over the last few years, the UK's agricultural sector has faced a 'perfect storm' of unprecedented uncertainty and volatility due in particular to shifting trading relationships internally (with the UK Internal Market Act) and externally (with new trade agreements and changes to market access) as well as profound modifications to agricultural policies and financial support.
- This perfect storm is leading to the end of the existing agricultural exceptionalism. This means that agriculture is gradually perceived by policymakers as just another economic sector not requiring extra support.
- The UK's trade agreements with Australia and New Zealand present risks to the sector that will be felt unevenly across the nations of the UK as well as over time.
- As the devolved nations have no formal constitutional role in trade policymaking, they are also the nations with the fewest formal opportunities to express their concerns.
- The first 'from scratch' post-Brexit trade agreements (UK-Australia and UK-New Zealand) risk forming the baseline standard for future UK trade concessions, potentially making these national-level vulnerabilities worsen with time.
- The UK's future trade agreements should minimise these risks and adopt positions that offset potential vulnerabilities. Projecting high standards of animal welfare and environmental protection, diversifying domestic production, and considering more 'joined up' institutional practices are among the options available.
- Considering the greyness or fuzzy (i.e. without clear distinction) nature of trade policy ownership as a policy domain, and its many components, a joined-up approach that focuses on people, networks, institutions and regions/nations should be advanced.

## Introduction

Clear risks exist for the UK's agriculture sector stemming from post-Brexit trade agreements.<sup>1</sup> A 'joined-up' and more 'holistic' approach could – at least in part – address these concerns, especially as the UK negotiates new agreements and faces potential trade challenges from the new administration across the Pond and an impending trade war<sup>2</sup> – compounded by a disrupted agricultural landscape.

## A perfect storm for farmers

Following the EU referendum vote, the UK's agricultural sector faces a 'perfect storm' unexperienced by any other sector of the UK economy. No other business activity has been faced with such uncertainty and volatility for four main reasons. First, global pressures on food systems and food security concerns have rapidly increased due to climate change – with increased frequency of extreme weather events, rising temperatures and shifting rain patterns – as well as supply chain disruption due to COVID-19<sup>3</sup> and the conflict in Ukraine in particular. Second, on the international scene, shifting trading relationships with the EU and beyond have directly affected agricultural imports and exports due to the modification of regulatory and border trade requirements (both in terms of sanitary and phytosanitary (SPS) and technical barriers to trade (TBT) coverage). The lack of market access protection previously offered by the EU through high tariffs for imports of agricultural products is disappearing for UK farmers. Third, within the UK, power and trading relationships across the four nations have evolved with the establishment of the UK internal market, underpinned mostly by the UK Internal Market Act 2020 (UKIMA) favouring 'Westminster rules'<sup>4</sup> and England as the lowest common denominator and 'first mover' that benefits from its central position.<sup>5</sup> Finally and crucially, the evolution in policies and laws around agriculture and its financial support (and more generally around agri-food for example with the Good Food Nation (Scotland) Act 2022) are rapidly causing the ground to shift underfoot.

For these reasons, an end to agricultural exceptionalism is clearly visible and is directly impacting how farmers work on a daily basis: in how they farm and produce food.<sup>6</sup> Agriculture is slowly becoming an economic sector

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<sup>1</sup> This briefing paper follows an event with ~150 civil servants at the European Union and International Trade Directorate of the Department for Environment, Food and Rural Affairs (DEFRA) in December 2024. The authors were invited to present ongoing CITP research at the event, and an open question and answer session.

<sup>2</sup> Grylls, Bethan, "UK trade in a Trump-tariff world," *Food Manufacture*, 5 December (2024). Available at: <https://www.foodmanufacture.co.uk/Article/2024/12/05/the-future-of-uk-trade-with-the-us-and-eu/>

<sup>3</sup> Petetin, Ludivine, "The COVID-19 crisis: An opportunity to integrate food democracy into post-pandemic food systems," *European Journal of Risk Regulation* 11, no.2 (2020): 326-336.

<sup>4</sup> Brown Swan Coree, Horsley, Thomas, McEwen, Nicola and Whitten Lisa Claire, "Westminster Rules? United Kingdom Internal Market Act and Devolution," 3 October 2024. Available at: [https://www.gla.ac.uk/media/Media\\_1114828\\_smx.pdf](https://www.gla.ac.uk/media/Media_1114828_smx.pdf).

<sup>5</sup> Petetin, Ludivine, "Setting the Path for UK and Devolved Agriculture," in Antonopoulos, Irene, Bell Matthew, Čavoški, Aleksandra, and Petetin, Ludivine (editors) *The Governance of Agriculture in Post-Brexit UK* (Oxon: Routledge, 2022) 40-62.

<sup>6</sup> Petetin, Ludivine, and Mary Dobbs, *Brexit and Agriculture* (Oxon: Routledge, 2022) 74 and 146.

similar to others. It is no longer perceived by the UK Government to need and deserve support and protection despite UK food security issues. Another example of this is the change to inheritance tax for farmers.<sup>7</sup>

## Imbalances over time and across nations

That trade agreements contribute to structural adjustments of economies (i.e. the potential for broader economy-wide restructuring) is no surprise, the merits and discontents of which have been widely discussed and debated. Looking at the UK's recent trade agreements with New Zealand and Australia, which are the first 'from scratch' trade agreements conducted by the UK post-Brexit, it becomes clear that the risks and vulnerabilities to the agricultural sector are likely to be regionally and temporally realised.

Of particular concern for the UK is the relative importance of *specific* agricultural products that are produced within *specific* regions/nations of the UK that are disproportionately exposed to the risks and costs of trade liberalisation (as further explained below). These most-at-risk regions/nations, namely Scotland and Wales,<sup>8</sup> also have no formal constitutional role in the negotiation of trade agreements with third countries, and thus are relatively excluded from the particulars of the process.<sup>9</sup> As a result, those nations of the UK with the most to lose regarding agricultural sector exposure are afforded the least opportunity to express their concerns via formal channels.

The risks of these imbalances are clear when one considers, for example, that 84% of all land in Wales is dedicated to agricultural production, and 75% of this is occupied by permanent pasture grassland.<sup>10</sup> Agriculture in Wales also accounts for a proportionately larger slice of employment, standing at more than double the proportion employed in the sector in England.<sup>11</sup> Research out of CITP at Queen's University Belfast has begun to shine a light on the difficulties posed by trade as a reserved function,<sup>12</sup> in particular with agriculture, and other domains that are increasingly incorporated in the negotiation of agreements presenting as a devolved competence. For agriculture, it appears that tensions over who 'owns' trade policy will negatively impact those most excluded from the process. As environmental concerns and treaty provisions progress with time, it is perhaps the case that these may become worse with time, forcing us to consider the temporal dimension of these risks.

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<sup>7</sup> HM Government, "What are the Changes to Agricultural Property Relief?," *HM Government*, 5 November (2024). Available at: <https://www.gov.uk/government/news/what-are-the-changes-to-agricultural-property-relief>.

<sup>8</sup> Although it is also important to note that Scottish whisky is greatly benefiting from tariff reductions.

<sup>9</sup> Petetin, Ludivine, Whitmore, Charles and Burmeister, Aileen, *Addressing Barriers for Welsh Institutions and Civil Society to Contribute to UK Trade Policy* (Sussex: Centre for Inclusive Trade Policy, 2023), Briefing Paper 6, <https://citp.ac.uk/publications/addressing-barriers-for-welsh-institutions-and-civil-society-to-contribute-to-uk-trade-policy>.

<sup>10</sup> Armstrong, Edward, "Welsh Farming Facts and Figures," *Senedd Research*, 16 December (2024). Available at: <https://research.senedd.wales/research-articles/welsh-farming-facts-and-figures/>.

<sup>11</sup> Armstrong, Edward, *Research briefing: The Farming Sector in Wales* (Cardiff: National Assembly for Wales Research Service, 2016), 16-053, <https://senedd.wales/media/aixbb5t4/16-053-web-english2.pdf>

<sup>12</sup> Whitten, Lisa Claire, *Trade and Devolution* (Sussex: Centre for Inclusive Trade Policy, 2024), Briefing Paper 18, <https://citp.ac.uk/publications/trade-and-devolution>.

By 2040 (when the trade agreements with New Zealand and Australia will have fully entered into force – see further below), the UK agricultural sector will have been significantly shaped by the interplay of trade agreements and domestic agricultural policies in several ways.

First, the questions of food sovereignty and security will remain central, with the potential for increased reliance on imports from New Zealand, Australia, and the Comprehensive and Progressive Agreement for Trans-Pacific Partnership (CPTPP), which will have further liberalised markets for agricultural products such as sheep meat, beef and eggs. These agreements, while enhancing trade opportunities, may pose challenges for domestic producers facing heightened competition.

Second, the implementation of the UK and devolved nations' four agricultural policies (each with distinct emphases, ambitions, and financial support mechanisms) will have had time to settle, potentially establishing new practices among farmers and producers. However, the sector's resilience is uncertain, as the 'perfect storm' of economic pressures, climate challenges, and policy shifts may have forced many farmers out of business.

Third, progress towards net zero in farming will likely vary, influenced by the effectiveness of sustainability initiatives and technological adoption. The long-term consequences of these structural changes, coupled with the temporality of trade agreements, will determine the UK's capacity to maintain a robust, self-sufficient agricultural system amidst evolving global and domestic pressures.

## Uneven vulnerabilities: The regionally defined risks of the UK's latest trade agreements

The UK's approach to trade mostly focuses its attention on exports. The slogan, '*Made in the UK, Sold to the World*,' renders this perspective clear.<sup>13</sup> This emphasis on facilitating exports to other countries led to major concessions, i.e. tariff reductions, in recent trade agreements, especially in agricultural products, indicating that the UK Government did not rate very highly the agricultural sector. Yet the sector can provide much-needed solutions to environmental challenges and food insecurity issues. It looks as if farmers were used as bargaining chips. These concessions have been largely concentrated in key economic sectors of the devolved nations.

While trade agreements have traditionally looked to liberalise sectors to 'sell more', the UK's post-Brexit agreements with Australia and New Zealand appear to have 'sold out' the agricultural sector of the devolved nations. Wales and Scotland could be particularly affected, for example, when we consider the future nation-level impacts of phased Tariff Rate Quotas (TRQs) on both beef and sheep meat products. Figure 1 highlights that over a 10-year period, the TRQs for imports of both products from Australia will increase steadily to a very large, albeit capped amount of 110,000 and 75,000 metric tonnes, respectively. The New Zealand agreement

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<sup>13</sup> Department for International Trade (now the Department for Business and Trade), "*Made in the UK, Sold to the World* (Web Version)," *Department for International Trade*, 17 November (2021). Available at: <https://www.gov.uk/government/publications/export-strategy-made-in-the-uk-sold-to-the-world/made-in-the-uk-sold-to-the-world-web-version>.

sees a 10-year schedule for beef and a 15-year schedule for sheep meat, at the end of which infinite amounts of non-tariffed imports are permitted.

Despite reservations by the Trade and Agriculture Commission (TAC),<sup>14</sup> over time, we expect to see increases in the imports of both beef and sheep meat products into the UK as a direct result of both the Australia and New Zealand agreements. Living in such a turbulent world, we simply cannot predict how Australia and New Zealand – both of which are agri-business, export-oriented economies – will react to such changes, or if their main current export destination – China – could decide to close its borders. Further, decisions from the US Administration to impose tariffs on, for example, Canadian, Mexican and Chinese goods (although some have been postponed)<sup>15</sup> create further unpredictability in the world trading system, making planning difficult, and could impact how and where some companies export.

Indeed, the effect of the liberalisation of sheep meat is already starting to be felt in the UK, with 2022-23 seeing a reported increase of 10% in the imports of New Zealand chilled lamb into the UK market.<sup>16</sup> This comes as 2024 is also cited as seeing record low numbers for the Welsh national flock, standing at approximately 8.75 million heads.<sup>17</sup>

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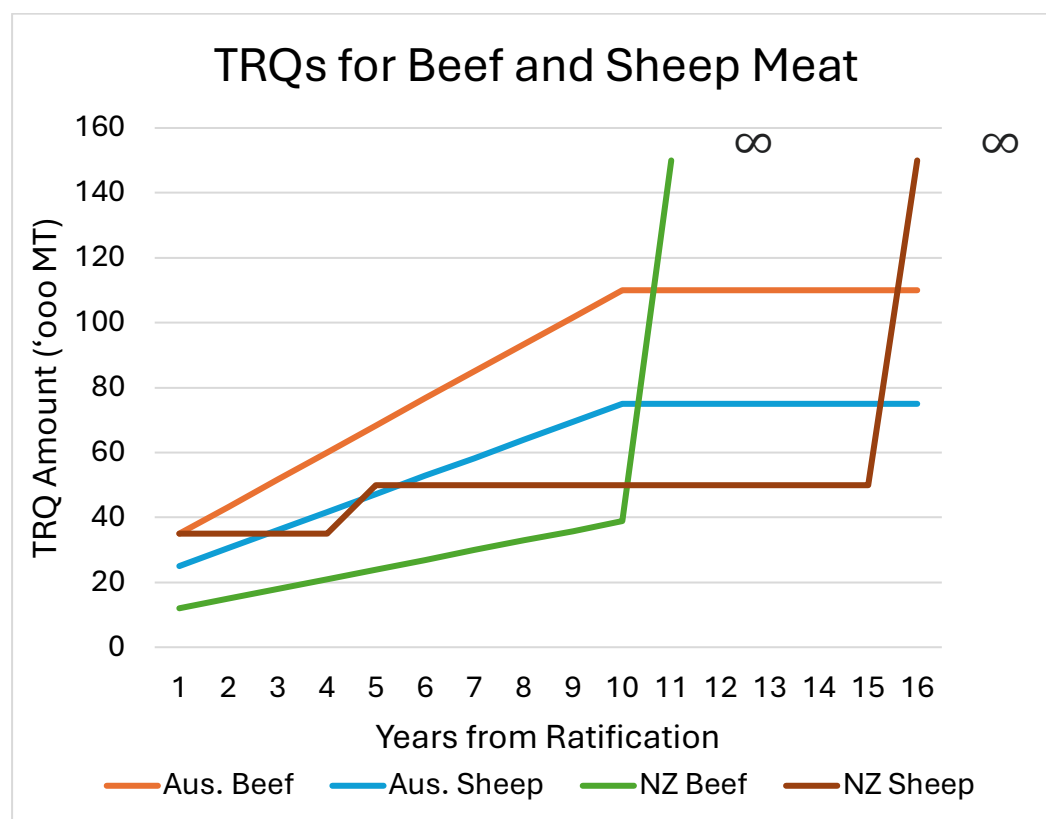
<sup>14</sup> Bartels, Lorand, et al., *Trade and Agriculture Commission: Advice to the Secretary of State for International Trade on the UK-Australia Free Trade Agreement* (London: Trade and Agriculture Commission, 2022), CP 663, <https://assets.publishing.service.gov.uk/media/625680a3e90e072a02602266/trade-and-agriculture-commission-advice-to-the-secretary-of-state-for-international-trade-on-the-uk-australia-free-trade-agreement.pdf>; Bartels, Lorand, et al., *Trade and Agriculture Commission: Advice to the Secretary of State for International Trade on the UK-New Zealand Free Trade Agreement* (London: Trade and Agriculture Commission, 2022), CP 709, <https://assets.publishing.service.gov.uk/media/62bdb0468fa8f535b735a582/trade-and-agriculture-commission-advice-to-the-secretary-of-state-for-international-trade-on-the-uk-nz-fta.pdf>.

<sup>15</sup> WhiteHouse.gov, "Fact Sheet: President Donald J. Trump Imposes Tariffs on Imports from Canada, Mexico and China," WhiteHouse.gov, 1 February 2025. Available at: <https://www.whitehouse.gov/fact-sheets/2025/02/fact-sheet-president-donald-j-trump-imposes-tariffs-on-imports-from-canada-mexico-and-china/>.

<sup>16</sup> National Farmers Union Cymru, "Challenges and Opportunities Facing the Lamb Sector," *NFU CYMRU*, 3 March 2023. Available at: <https://www.nfu-cymru.org.uk/news-and-information/challenges-and-opportunities-facing-the-lamb-sector>

<sup>17</sup> McCarthy, James, "Wool-d you believe Wales is losing sheep?" *BBC News*, 23 November (2024). Available at: <https://www.bbc.co.uk/news/articles/c206y40gke5o>

Figure 1: TRQs for beef and sheep meat imports to the UK from the Australia and New Zealand trade agreements. Data taken from the appendices of both agreements.



Greater amounts of imports *should* translate into more appealing prices for consumers – right? This is true. When scrutinising the impact statements of both agreements, both estimate that increased competition from imports could lower costs for both consumers and businesses alike. However, given Australia’s position as an exporter of around a tenth of global beef exports,<sup>18</sup> and a third of global sheep meat exports, and the dominant role of New Zealand in these product categories too,<sup>19</sup> the competitive advantage and relative size of the UK’s new trading relationships should be a concern for domestic producers. In fact, the impact assessments for the Australia and New Zealand Trade Agreements estimate that domestic production of these products could shrink as a direct result of increased imports, negatively impacting domestic producers and having wider concerns for

<sup>18</sup> Department for International Trade, *Impact assessment of the Free Trade Agreement between the United Kingdom of Great Britain and Northern Ireland and Australia* (London: Department for International Trade, 2022), <https://assets.publishing.service.gov.uk/media/6279355de90e074eeaa867e3/impact-assessment-of-the-free-trade-agreement-between-the-united-kingdom-of-great-britain-and-northern-ireland-and-australia.pdf>.

<sup>19</sup> Department for International Trade, *Impact assessment of the Free Trade Agreement between the United Kingdom of Great Britain and Northern Ireland and New Zealand* (London: Department for International Trade, 2022), <https://assets.publishing.service.gov.uk/media/621893a18fa8f54916f45f53/uk-new-zealand-free-trade-agreement-impact-assessment.pdf>.

rural affairs and employment policies.<sup>20</sup> Former Environment Secretary, George Eustice, even declared that the Australia Trade Agreement is “not actually a very good deal” for farmers.<sup>21</sup> As such, there is an expectation that the existing agreements will contribute to the production of policy incoherence over time and across the nations of the UK.

Potentially, the greatest risk presented by both the Australia and New Zealand agreements, is (beyond the damage that the contents of *these* agreements will democracy), that these agreements set the bar for future negotiations. As the first ‘from scratch’ agreements conducted by the UK Government post-Brexit, it is likely that these agreements will constitute a template for future agreements with other third countries.<sup>22</sup> As such, the risk of exposure for Scottish and Welsh agricultural producers is likely to increase with time if the UK adopts the framework of concessions made in the Australia and New Zealand Agreements as the new ‘norm’ of British trade policymaking. Although it should be acknowledged that the current UK Labour Government could adopt an approach that differs from their Conservative Party forebearers whom negotiated and signed both of the agreements discussed. Absent a clear UK trade policy, increased uncertainty surrounds these risks. Additionally, these agreements have ‘shown the UK’s hand’ and willingness to grant concessions in sectors that are defined by their importance to the devolved nations, exposing domestic producers of both beef and sheep meat to future liberalisation prospects especially when looking at future trade agreements with the Gulf Co-operation Council, Korea, or India and the varied and different way they farm.

## Policy tools to protect and promote the UK’s devolved agricultural sector

Despite the national-level and temporal risks posed to the UK’s agricultural sector by the Australia and New Zealand trade agreements, levers to protect domestic producers and the agricultural sector more broadly are available to lawmakers. Chief among these levers is the prospect that the UK Government maintains a high level of environmental protection and animal welfare standards in trade. Having these regulatory efforts reflected in future trade agreements would see the UK project a normative power through trade. Furthermore, this lever avoids the UK simply externalising environmental harms through trade relations, while also ensuring that if domestically-produced goods are replaced by imports, these substitutional goods are of an equal quality regarding environmental and animal welfare standards. This approach has been adopted in the past, for example, in promoting food safety and animal health standards regarding anti-microbial resistance and

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<sup>20</sup> Department for International Trade, *Impact assessment of the Free Trade Agreement between the United Kingdom of Great Britain and Northern Ireland and Australia* (London: Department for International Trade, 2022), <https://assets.publishing.service.gov.uk/media/6279355de90e074eeaa867e3/impact-assessment-of-the-free-trade-agreement-between-the-united-kingdom-of-great-britain-and-northern-ireland-and-australia.pdf> ; Department for International Trade, *Impact assessment of the Free Trade Agreement between the United Kingdom of Great Britain and Northern Ireland and New Zealand* (London: Department for International Trade, 2022), <https://assets.publishing.service.gov.uk/media/621893a18fa8f54916f45f53/uk-new-zealand-free-trade-agreement-impact-assessment.pdf>.

<sup>21</sup> Sustain, “Former Environment Secretary Blasts Australia Trade Deal as Bad for UK Farmers,” *Sustain*, 15 November (2022). Available at: <https://www.sustainweb.org/news/nov22-george-eustice-australia-trade-deal/>.

<sup>22</sup> Similarly, the CPTPP focuses on the expansion of UK exports whilst reducing tariffs for example on eggs, pork, chicken and beef from Canada and Mexico.

ractopamine<sup>23</sup> and could be reasonably expanded to include other aspects of the agricultural system that matter to the public and/or the state.

Moving forward, bearing in mind the possible reset of the UK's trading relationship with the EU, three other levers could be realised. Firstly, a sanitary and phytosanitary equivalence zone via an EU-UK SPS Agreement should be established to cover both animal and plant products.<sup>24</sup> Efforts should also be taken to restrict technical barriers to trade, such as labelling and traceability matters, via a TBT agreement. Such efforts would provide greater transparency to consumers when choosing between products, as well as hold the potential to leverage compliance with or a shift towards high normative UK standards on animal welfare and environmental protection matters. These impacts are likely to be effective given the high esteem with which the British public hold the Red Tractor Label or other such food standard branding efforts. Thirdly, as has been recently discussed in a CITP blog, the UK could join the Regional Convention on Pan-Euro-Mediterranean regarding preferential rules of origin, improving the export opportunities for the UK's domestic producers – although this would be minimal.<sup>25</sup> Addressing issues around customs more widely is paramount.

Looking beyond trade and thinking about agriculture in a holistic manner, schemes to transition towards low-emissions agricultural systems should be considered to a greater extent.<sup>26</sup> While there are concerns over the relative carbon intensity of beef and sheep meat imports, that will replace the relatively low intensity of domestically-produced products, for example, the UK and devolved nations should treat the turbulence created by the agreements as a critical juncture to seek opportunities that such restructuring can bring. Diversifying domestic agricultural production towards plant-based (especially horticulture) and lower levels of livestock farming could be beneficial for food security and the achievement of environmental and climate goals alike. Repurposing some land for the cultivation of fruits, vegetables, nuts, lentils, or pulses, for example, could lead to a more balanced food system, lowering the dependence on singular crops. This has the added benefit of reducing food security risks from environmental risks, such as poor weather adversely affecting one type of crop. Such undertakings could also potentially benefit producers by diversifying income streams and lowering their exposure to liberalisation risks as phased TRQs come into play.

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<sup>23</sup> It is a veterinary drug which belongs to beta-agonists and is a growth promoter used in animal feed. For more on the differences in EU and US regulation, see Centner, Terry J. and Petetin Ludivine, *Divergent Approaches Regulating Beta Agonists and Cloning of Food Animals: United States and European Union* (2020) 28(5-6) *Society and Animals* 613. Available at [https://brill.com/view/journals/soan/28/5-6/article-p613\\_9.xml?language=en](https://brill.com/view/journals/soan/28/5-6/article-p613_9.xml?language=en).

<sup>24</sup> Lydgate, Emily and Carson-Taylor, Alex, *An EU-UK SPS Agreement: The Perils and Possibilities of (Re)Alignment* (Sussex: Centre for Inclusive Trade Policy, 2024), Briefing Paper 17, <https://citp.ac.uk/publications/an-eu-uk-sps-agreement-the-perils-and-possibilities-of-realignment>.

<sup>25</sup> Tamberi, Nicolò, "Should the UK join the Pan-Euro Mediterranean Convention?" *Centre for Inclusive Trade Policy*, 28 June (2024). Available at: <https://citp.ac.uk/publications/should-the-uk-join-pem>.

<sup>26</sup> See Cardwell Michael, "The Environmental Land Management Scheme: Public goods and levels of ambition" (2024) 26(3) *Environmental Law Review* 223; and Busse, Christian, Mögele, Rudolph and Petetin, Ludivine, "Das Kolloquium "Public Money for Public Goods" im Rahmen des XXXI. Europäischen Agrarrechtskongresses des CEDR in Cardiff" (2024) 1 *Agrar- Und Umweltrecht* 2. Further, the main financial support scheme in England, the Sustainable Farming Incentive, has been paused until 2026 due to budget constraints and lack of forecasting by DEFRA. See HM Government, "An update on the Sustainable Farming Incentive", 11 March (2025). Available at: <https://defrafarming.blog.gov.uk/2025/03/11/an-update-on-the-sustainable-farming-incentive/>.



## Institutional considerations to promote a joined-up approach

Looking forward, to address the nation-level risk and temporal risks to the UK's agricultural sector, the UK should adopt a 'joined up' or coherent approach to designing its trade policy and negotiating trade agreements. To do this, the UK should focus on people, institutional relationships, and the 'ownership' of trade policy.

Looking first to people, the turnover within the European Union and International Trade Directorate of DEFRA is significant (similarly to much of the rest of Whitehall), contributing to a hollowing out of institutional knowledge, networks, and relationships.<sup>27</sup> For trade and policy coherence, reductions in the human capital of government mean that multi-institution relationships and opportunities for departments and units to collaborate are made more difficult. Attempts to maintain and retain staff should be made with respect to those looking to leave the public sector. Where movement is internal, with civil servants moving from one directorate or ministry to another, pairings or partnerships between relevant units (such as trade and agriculture, or agriculture and employment) should be considered so as to build upon relevant policy networks that can contribute directly to coherent joined-up approaches to tackle future trade policy issues and challenges. Such informal networks and human capacity have been noted to positively impact and contribute to effective law-making, negotiation, and policy outcomes.<sup>28</sup> Movement between the central government civil service and devolved administrations may also be opportunities to develop cross-government capacity and provide network-based opportunities for the devolved administrations to engage on trade where no such constitutional right exists.

Building on the potential for personal-level institutional relationships, the election of the Labour Government in Westminster which has expressed an interest in including the devolved nations in the policy-making process, shows promise for the development of institutional-level relationships to form and flourish. For Wales and Scotland, a history of non-Conservative leadership in these devolved nations means that the Westminster Labour Government may be more a partner that they are more willing to collaborate with as opposed to scapegoat against. The ongoing review of UKIMA serves as a prime opportunity to undertake a revision of the existing relationships.<sup>29</sup>

Looking at trade policy and the agricultural sectors of the UK nations, this institutional-level collaboration holds promise for a more open expression of concerns and worries over the impact of trade at the regional/national level. Given the lack of a formal role for the devolved nations in the trade negotiation process, but the importance of devolved nations in the implementation of many elements of trade policies which present as devolved competences (such as agriculture), meaningful institutional relationships could provide opportunities for the devolved nations to engage and express their concerns over new agreements. Such an approach would

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<sup>27</sup> For example, the event that the authors presented at is held twice a year. This is undertaken as turnover is large to introduce new staff and integrate them within the unit. More generally on Whitehall turnover, see Institute for Government, "Whitehall Monitor 2025", 16 January (2025). Available at: <https://www.instituteforgovernment.org.uk/publication/whitehall-monitor-2025>.

<sup>28</sup> See, for example, Garner-Knapp, Lindsey, Mason, Joanna, Mulherin, Tamara and Visser, E. Lianne (editors) *Informality in Policymaking: Weaving the Threads of Everyday Policy Work* (Leeds: Emerald Publishing Ltd., 2025).

<sup>29</sup> HM Government, "UK Internal Market Act 2020: Review and Consultation Relating to Parts 1, 2, 3 and 4", 6 February (2025). Available at <https://www.gov.uk/government/consultations/uk-internal-market-act-2020-review-and-consultation/uk-internal-market-act-2020-review-and-consultation-relating-to-parts-1-2-3-and-4#summary-of-questions>.

also help to address the concerns that emerge from the diverse nature of the agricultural sector across the UK, with the structure and focus of agriculture varying significantly from one UK nation to the next.<sup>30</sup> Such networks and relationships could reduce the risk of future trade agreements seeing risks and concessions concentrated in some nations or regions of the UK, whereby the devolved nations of Wales and Scotland appear to currently be the most exposed to future risks. Greater socialisation among the governments of the UK via meaningful communication, meetings, collaboration and networks would provide Westminster with an opportunity to learn about the positions of the devolved nations, and act in their interest when negotiating trade agreements, rather than preferring English positions or preferences to such a noticeable degree.

Finally, the 'ownership' of trade and the mixed nature of the many provisions of trade agreements is a clear concern for many policymakers. The grey or fuzzy nature of trade<sup>31</sup> is flagrant, given the central government's ownership of trade as a policy, but the devolved nations' responsibility for many of the policy areas addressed in contemporary trade agreements. The same can be said for the devolved nations who see that the policy areas they have responsibility for, such as agriculture, are specifically addressed in UK trade agreements, but they have no formal constitutional role in the process of negotiating and making the trade policies that contain these provisions.

Together, the ownership of trade negotiation by the Department of Business and Trade, and the ownership of many provisions by other ministries leave ample room for grey space to emerge, contributing to policy incoherence in both the process and outcomes of trade agreements. By developing personal and institutional-level networks, we expect that the ambiguities over who to include, when to do so, and on which aspects of policy, will be reduced. Together, these approaches could minimise the agricultural sector's future exposure to regionally-concentrated challenges brought about by future trade liberalisation measures. By developing clear and formal lines of communication, the positions of all governments of the UK can be expressed, enabling the costs and benefits from trade agreements to be more evenly felt across, nations, sectors, and time.

## Conclusion

The UK's recent trade agreements with Australia and New Zealand have exposed the agricultural sectors of the devolved nations to concentrated patterns of potential costs over time, largely as a result of sector-specific liberalisation for goods that are disproportionately economically important for the devolved nations. Increases in the TRQs of beef and sheep meat are likely to adversely affect the agricultural sector in both Wales and Scotland, relative to the more diversified agricultural sector of England and Northern Ireland. Some signs already indicate this change. The liberalisation of these specific agricultural products, that are produced in some nations of the UK, has exposed them to the risks of liberalisation more so than their contemporaries elsewhere

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<sup>30</sup> Petetin, Ludivine, and Dobbs, Mary, *Brexit and Agriculture* (Oxon: Routledge, 2022).

<sup>31</sup> CITP, "Being Local, Being Global: Regional Trade Policy Forum – Wales", 13 February (2025). Available at <https://citp.ac.uk/publications/being-local-being-global-regional-trade-policy-forum-wales>.

on these shores. To that end, while the UK negotiates trade agreements for the country, the risks of agricultural trade liberalisation are unevenly felt across its nations.

The exposure of Wales and Scotland to these risks is not accidental, and stems from the structure of trade policymaking in the UK. Trade as a policy is 'owned' by the UK government, despite many provisions of contemporary trade agreements containing specific reference to policy areas that are handled by the devolved administrations, such as agriculture. To that end, those with the most potential to lose have the fewest formal opportunities to engage and express their concerns. Further, the design of a trade policy/strategy that recognises the importance of both UK and devolved agriculture and its products is still needed.

In this Briefing Paper, we have highlighted several opportunities that the UK Government could – and should – undertake to minimise these nation-level risks becoming the norm as it negotiates future trade agreements. The promotion of UK animal welfare and environmental protection standards, in addition to reducing SPS and technical barriers to trade, would serve as protections to British producers. This could include consumer information on topics of public concern. Such actions would ensure that imports would match the high quality of domestically-produced goods, while also providing information to consumers to choose the products they wish to purchase. Joining the Pan-Euro-Mediterranean Convention, and more generally, minimising customs rules, would also provide opportunities for domestic producers that have been severed following Brexit.

At both the devolved and UK levels, we have also outlined ways in which the devolved nations could encourage their agricultural sectors to become more resilient through crop diversification. Building relationships via institutional partnerships with central government would also improve the role of the devolved nations in the trade policy process. This has the potential to be facilitated not only by the new Labour Government, but also through the ongoing review of UKIMA.

Given the fuzzy nature of trade policy 'ownership' and its many components, we advocate for a joined-up approach that focuses on people, networks, institutions and regions/nations. This would provide the capacity to create trade policy and agreements that consider the positions of all governments of the UK, whether they have a formal constitutional role in trade policymaking or not. This would see the costs and benefits of trade more evenly felt across the nations of the UK and would improve the balance of benefits relative to the potential costs currently being exposed by the agricultural sectors of Scotland and Wales. Moving forward, this approach would see trade agreements be 'British' in nature rather than just 'English'.