



HOUSE OF LORDS

European Affairs Committee

House of Lords
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17 September 2025

The Rt Hon Nick Thomas-Symonds MP
Minister for the Cabinet Office, His Majesty's Paymaster General
Cabinet Office
1 Horse Guards Road
London
SW1A 2HQ

Dear Minister,

Com(2025)408 + Annex of 16 July 202: Recommendation for a Council Decision authorising the opening of negotiations between the European Union and the United Kingdom of Great Britain and Northern Ireland on a common sanitary and phytosanitary area between the European Union and the United Kingdom in respect of Great Britain and to link the United Kingdom and the Union's greenhouse emissions trading systems

Thank you for your Explanatory Memorandum (EM), dated 28 August 2025, which was considered by the House of Lords European Affairs Committee at its meeting of 16 September 2025.

We explored some of these issues in our report 'The future UK-EU relationship' (4th Report of Session 2022-23, HL Paper 184) and have continued to pay close attention to any developments related to the prospects of UK-EU cooperation on sanitary and phytosanitary issues (SPS) and greenhouse emissions trading systems (ETS).

We attach great importance to both areas of UK/EU cooperation covered by these proposed agreements and to the role we as a Parliamentary Committee play in constructive engagement with the Government, the future negotiations, and their possible outcomes.

We note that this recommendation has not yet been adopted by the Council of the EU. Nevertheless, the draft EU mandate and your EM have led to several questions, on which we seek clarification from the Government.

We note that in your EM you acknowledge that both the SPS and the ETS linking agreements will include dynamic alignment, but that due regard will be given to "the United Kingdom's constitutional and parliamentary procedures".

In light of these assurances, we would like to see more detail on the proposed role you foresee for Parliament in monitoring and scrutinising dynamic alignment on an ongoing basis, once the prospective agreements on an SPS area and an ETS link are in place. As noted above, the role of the Parliament is of central concern to the Committee.

We would also appreciate more information about the likely timetable for these negotiations; when will they start and by when you would like to see them concluded. We therefore ask that you update Parliament periodically on their progress.

Should negotiations conclude in agreements, when does the Government envisage that both the common SPS area and the ETS link will be operational.

We note that in your EM you acknowledge that both the SPS and the ETS linking agreements “will require the UK to provide an appropriate financial contribution to the costs of relevant European Union Agencies, systems and databases within these policy areas”. We understand that it is impossible to estimate these costs at this stage, but we would welcome your clarification as to the expected timescale as to when a clearer picture of the expected costs will emerge? It would also be helpful to know when the EU’s CBAM will enter into force. We understand that it is currently formally expected to begin full operation in January 2026 but, earlier this year, the European Commission brought forward a package of proposals which included a provision that would extend the date by which the full implementation of the CBAM would be required to January 2027 – we note that this is the same time when the UK’s own CBAM will begin. We would therefore ask you to clarify the respective timetables by which both Parties will introduce, in full, their respective CBAMs?

We would also ask you to outline, if the UK-EU ETS linkage agreement is not in place by January 2026 (when the EU’s CBAM is (currently planned) to be fully applied), whether you plan to ensure that the UK is nevertheless not subject to the EU CBAM; and, if so, how you envisage achieving this aim?

We retain our interest in this matter and look forward to considering your response within the usual 10-day deadline.

I am copying this letter to Lord Carlile of Berriew, and Liam McNulty, respectively Chair and Clerk of The Northern Ireland Scrutiny Committee.

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'Peter Ricketts'.

Lord Ricketts, Chair of the European Affairs Committee