



Rt Hon Hilary Benn MP
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Rt Hon Nick Thomas-Symonds MP
Minister for the Cabinet Office
HM Paymaster General
Cabinet Office
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21 November 2025

Dear Ministers,

Windsor Framework Independent Monitoring Panel: Report on the first reporting period for the UK Internal Market Guarantee (1 January - 30 June 2025)

We write in relation to the Windsor Framework Independent Monitoring Panel: Report on the first reporting period for the UK Internal Market Guarantee (1 January - 30 June 2025), which was presented to you on 5 November 2025. The House of Lords Northern Ireland Scrutiny Committee considered this report at its meeting on 19 November.

We note the finding "that 96% of the value of goods moved under freight did so within the Internal Market system" in the first six-month reporting period and that therefore the Government's Internal Market Guarantee of "more than 80% of all freight movements from Great Britain to Northern Ireland will be treated as 'not at risk' of moving onwards to the EU, and therefore moving within the UK internal market and customs territory" has been met.

We note that the Panel chose to base its assessment of the Guarantee on the value of the goods moved, rather than drawing on alternative measures, such as, the number of freight movements. Is the Government aware as to why the Panel chose to adopt this particular methodology? Can you tell us what proportion of overall freight movements were within the Internal Market System? What statistical data did the Government provide to the Panel to assist it in its deliberations? Will the Government share this data with the Committee and any headline statistics on which the IMP Report was based?

We also note the IMP's statement that "not all of the goods movements within the 96% are eligible for the new simplified processes introduced by the Windsor Framework" as a "proportion of the goods within the 96%, were deemed 'not at risk' on the basis that no



tariff was due on those goods regardless of their end destination.” What proportion of the 96% goods are unable to avail of the new simplified processes? Which goods or sectors are predominantly impacted? How many recipients of freight goods are affected? What is the impact of this on trade between Great Britain and Northern Ireland? What additional costs is this projected to present for businesses and consumers?

We note that there is overlap between the IMP’s report and recommendations, those in our most recent report, *Northern Ireland after Brexit: Strengthening Northern Ireland’s voice in the context of the Windsor Framework*, and the findings of Lord Murphy’s *Independent Review of the Windsor Framework*. By when will you provide responses to the three reports? What actions do you intend to take in response to the Independent Monitoring Panel’s report and recommendations, and on what timescale?

We would be grateful for a response before the House rises for Christmas recess.

I am copying this letter to Tonia Antoniazzi MP, Chair of the Commons Northern Ireland Affairs Committee and Ciara Ferguson MLA, Chair of the Northern Ireland Assembly Windsor Framework Democratic Scrutiny Committee.

Yours sincerely,

Lord Carlile of Berriew CBE KC,
Chair, Northern Ireland Scrutiny Committee