

## **Ulster Farmers' Union – Written Evidence (DYN0064)**

### **Ulster Farmers' Union – Dynamic Alignment Call for Evidence**

***This submission was prepared with the assistance of artificial intelligence tools. All content has been reviewed and approved by the Ulster Farmers' Union.***

#### **Questions**

***2. In developing its arrangements for dynamic alignment, are there lessons that the UK should draw from:  
b) the experience of a form of dynamic alignment with respect to Northern Ireland under the Withdrawal Agreement Protocol/Windsor Framework?***

The experience of Northern Ireland under the Withdrawal Agreement Protocol, as subsequently amended by the Windsor Framework, provides a unique and practical example of how dynamic alignment operates in reality.

For the agri-food sector, alignment with EU sanitary and phytosanitary (SPS) rules has been essential in maintaining access to the EU Single Market, which remains a critical outlet for Northern Ireland produce. This has provided a degree of stability and continuity for farm businesses and supply chains.

However, this has come alongside clear challenges. The operation of dynamic alignment has introduced additional processes and frictions for goods moving from Great Britain to Northern Ireland, increasing administrative burdens and costs for businesses. It has also required ongoing adaptation to evolving EU rules, often with limited opportunity into their development.

While it has at times been possible to communicate sector-specific concerns and influence the application of certain measures, it has also proved difficult to communicate and secure the flexibilities needed that reflect Northern Ireland's unique circumstances.

Overall, Northern Ireland's experience demonstrates that dynamic alignment can support market access and regulatory stability, but it is not a purely technical

exercise. It has real implications for internal UK trade, business costs and governance.

The operation of the Windsor Framework demonstrates that there are both positive and negative lessons to be learned. It is important that future UK–EU arrangements take full account of this experience, building on what has worked effectively while addressing areas where the system has proven burdensome or impractical.

The key lesson is that any future UK–EU arrangements based on dynamic alignment must strike a careful balance between facilitating trade and ensuring that sufficient flexibility, consultation and scrutiny are in place to reflect practical realities on the ground.

***3. Can formal 'decision-shaping' by non-EU states, under agreements with the EU, deliver real influence over the EU law to which it applies? If so, what institutional arrangements and resources should the UK Government have in place—in London, Brussels and national capitals around Europe—to ensure that it can participate in EU 'decision-shaping' as effectively as possible?***

Northern Ireland's experience indicates that decision-shaping can provide a degree of influence. Where dynamic alignment applies, however, there is no alternative but to engage fully and seek to influence outcomes as early and effectively as possible.

Effective decision-shaping depends on a coordinated UK-wide approach. This should involve close working between devolved administrations and Whitehall departments. For example, the Department of Agriculture, Environment and Rural Affairs feeding into the Department for Environment, Food and Rural Affairs, with positions then advanced through the UK Mission to the EU in Brussels. This process should be supported by the continued presence and engagement of the Northern Ireland Executive Office in Brussels.

The UK is likely to be most effective when it is able to present a clear and unified position, reflecting the interests of all parts of the United Kingdom. This strengthens engagement with EU institutions and improves the prospects of achieving practical outcomes, such as reducing administrative burdens, improving market access, and addressing frictions in east–west trade.

There is also an important role for industry. Farming organisations, including the Ulster Farmers' Union, maintain engagement in Brussels through the British Agriculture Bureau and membership of COPA-COGECA. This ongoing presence has enabled continued dialogue with EU stakeholders and highlights the importance of sustained engagement over time.

This engagement is complemented by the work of the Northern Ireland Executive Office in Brussels, which plays an important role in representing Northern Ireland's interests and facilitating engagement with EU institutions. Experience to date has shown that effective decision-shaping requires consistent effort over time and a clear understanding of what approaches are most effective in influencing outcomes.

To strengthen this approach, it is important that the UK Mission to the EU is appropriately resourced and able to draw on the best available expertise from across the United Kingdom. This includes building on existing capability within the Mission, while ensuring that specialist knowledge from devolved administrations, government departments and industry can be effectively coordinated and deployed to support UK objectives.

It is also important to recognise that many of the challenges faced by UK farmers are shared with their counterparts across EU Member States. While there will be areas of divergence, there is often significant common ground on issues affecting the agri-food sector. This creates opportunities to build relationships and align positions where interests coincide, strengthening the overall effectiveness of decision-shaping efforts.

To be effective, decision-shaping must be properly resourced at all levels, London, Belfast and Brussels and supported by strong technical expertise. It should also be recognised that this is an ongoing process: securing an agreement is only the starting point, and meaningful influence depends on continued engagement as EU rules evolve.

***4. Are current arrangements for parliamentary scrutiny of UK-EU relations adequate for scrutinising dynamic alignment? What would an ideal system for parliamentary scrutiny of UK dynamic alignment comprise?***

As a general principle, the Ulster Farmers' Union considers that the highest possible level of parliamentary scrutiny is both necessary and desirable in the context of dynamic alignment. This is not something to be avoided; rather, it should be embraced as a means of ensuring transparency, accountability and better policy outcomes. Previous scrutiny undertaken by committees of the House of Lords, particularly in relation to Northern Ireland and the operation of the Windsor Framework, has played an important role in highlighting practical challenges, representing business concerns, and holding the Government to account. This model of informed, evidence-based scrutiny should not be treated as exceptional, but instead embedded as a core feature of how dynamic alignment is overseen across the UK.

***9. What issues does prospective UK dynamic alignment raise for the UK's devolved administrations and legislatures? How should the UK***

## ***Government and Parliament engage with the devolved administrations and legislatures in a system of dynamic alignment?***

Dynamic alignment raises significant issues for devolved administrations, but it also presents opportunities to improve how regulatory policy is coordinated across the UK.

From a Northern Ireland perspective, experience under the Withdrawal Agreement Protocol and the Windsor Framework has placed considerable pressure on the Department of Agriculture, Environment and Rural Affairs (DAERA). The Department has been required to manage the application of evolving EU SPS rules under dynamic alignment, while simultaneously delivering its core domestic responsibilities. This dual burden is unique within the UK and has stretched resources significantly.

A UK-wide approach to dynamic alignment, particularly in the context of a future SPS agreement, has the potential to alleviate this imbalance. Bringing all parts of the UK under a broadly consistent regulatory framework would reduce divergence and create a more level playing field for farmers, which is a positive outcome for the agri-food sector.

In this context, the Ulster Farmers' Union considers that there should be a more coordinated and strategic approach across government. Whitehall departments should take a leading role in managing dynamic alignment at a UK level, while engaging closely with devolved administrations to ensure that regional perspectives are fully reflected.

This should enable the UK to engage with the EU more effectively, presenting a coherent and unified position when raising concerns or seeking flexibilities. A more joined-up approach would also help ensure that the practical realities facing farmers in different parts of the UK are properly understood and represented.

More broadly, if designed and implemented effectively, UK-wide dynamic alignment has the potential to support food security objectives by ensuring regulatory consistency and stability across the UK's agri-food sector, reinforcing the principle that food security is an integral component of national security.

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