Written evidence submitted by Hleb Buziuk, independent public policy and governance researcher, to the House of Commons Business and Trade Committee inquiry on UK trade with the EU.

1) One-page briefing

1.1. I submit this evidence in a personal capacity as an independent public policy and governance researcher, with no commercial interest in any UK-EU negotiating outcome.

1.2. Three key messages:

- The reset is most credible where political commitments have moved into formal negotiation tracks, notably SPS, ETS and electricity, but published delivery architecture remains thinner than the implementation task [1][3][4][7][8].
- The Committee should test trader-facing outcomes, not only diplomatic progress: HMRC recorded 362,992 businesses named on customs declarations in 2025, while the EU-only trader population fell and the non-EU-only population rose [5].
- Selective alignment is more evidence-led than blanket alignment or blanket divergence. The clearest published cases are agri-food, electricity and chemicals, where market access, duplicate compliance or safety regulation create specific reasons to consider alignment [1][4][9][10][13].

1.3. Key findings:

- The reset has moved furthest where both sides have accepted a defined negotiation route. SPS and ETS talks were authorised by the Council in November 2025, and electricity talks in March 2026 [3][4].
- The gap between non-EU-only and EU-only customs traders widened from 23,185 businesses in 2024 to 37,761 in 2025, a 63% increase using the 2024 gap as denominator [5].
- Taken together, Defra's estimate of approximately 500,000 affected businesses and HMRC's 362,992 customs-declaration businesses suggest that SPS readiness should be tested beyond direct border traders [5][8].
- The NAO reports that the new border model's estimated annual trader cost rises from £469 million to £537 million if trusted trader schemes are not introduced on time, a £68 million or 14.5% premium using £469 million as denominator [7].

1.4. Key recommendations:

- Cabinet Office, DBT, Defra, HMRC and DESNZ should publish, within three months, a single UK-EU reset delivery tracker with owners, milestones, sector impacts and guidance dates. Check: quarterly public update.
- Defra and DBT should publish, within six months, the method behind the "approximately 500,000 businesses" SPS estimate. Check: denominator, sector split and trader-status split [8].
- HMRC should publish annual EU-only, non-EU-only and both-market trader counts by firm size and sector. Check: same fields as HMRC's 2025 customs population table [5].
- The Committee should ask for a cross-government border dependency map covering SPS, the Single Trade Window, trusted trader schemes and guidance. Check: owner, RAG status and next decision point [7].

1.5. What is new versus official sources:

- It combines negotiation status with delivery readiness.
- It turns business engagement into a denominator test.
- It uses derived metrics to identify where follow-up data are needed.
- It proposes a Selective Alignment Test for sector-by-sector scrutiny.

1.6. Methods and limitations: this submission uses origin-first public evidence; inferred impacts are labelled and paired with tests. See section 3, Annex A, section 7 and section 9.

2) About the submitter

2.1. Hleb Buziuk is an independent public policy and governance researcher. This evidence is submitted in a personal capacity. The submission is intended to help the Committee test implementation, accountability and evidence quality in the UK-EU reset.

3) Methods, sources and limitations

3.1. I used an origin-first source ladder: official statistics, formal UK and EU documents, audit reports and government consultation outcomes are prioritised. Committee evidence and public statements are treated as secondary unless they originate the relevant fact.

3.2. No secondary-only headline claims are relied on. Where this submission draws implications from anchored inputs, it labels them as inference or pairs them with a test in section 7 or section 9.

3.3. Synthesis insights require at least two visible anchors. In particular, the alignment analysis uses UK-EU reset texts, EU Council authorisations and sector-specific UK evidence on SPS and UK REACH [1][3][4][8][9][13].

4) Context and background

4.1. The Committee's Call for Evidence asks whether the reset has the right framework, what benefits it can deliver without returning to the single market, customs union or freedom of movement, which sectors are most affected by divergence, and how business engagement and preparedness should be judged.

4.2. Commons guidance says written evidence should be relevant, concise, in Word or another editable format, and not exceed 3,000 words. This submission therefore focuses on the reset as a delivery system: who owns what, what can be measured, and what the Committee can ask for.

5) Evidence mapped to the Committee's themes

5.1. Wider context and the UK-EU reset so far

5.1.1. The reset has established formal routes for targeted gains, not yet evidence of realised gains. The clearest formal movement is from the Common Understanding and Joint Statement into negotiation authorisations on SPS, ETS and electricity [1][2][3][4]. The key gap is public delivery architecture: who owns each file, what must be delivered by when, and how business-facing benefits will be measured. This is why the Committee should request delivery and dependency data.

5.1.2. Observations: SPS and ETS talks were authorised in November 2025; electricity talks were authorised in March 2026; Defra is working toward a mid-2027 SPS start date [3][4][8].

5.1.3. Added value: this submission tests reset credibility by comparing political intent, formal mandates and implementation dependencies.

- The reset should be measured by dated delivery, not only by summit language.
- Near-term economic benefits are likely to be sector-specific.
- The Committee should request one owner map covering Cabinet Office, DBT, Defra, HMRC and DESNZ.

5.1.4. Counterpoint: formal negotiation mandates are not signed agreements. Option A: keep separate departmental updates. Option B: publish one delivery tracker. Preferred: B, because the risks are cross-departmental.

5.2. Alignment, divergence, customs and digital trade

5.2.1. Published evidence is clearest where goods cross borders with certification, checks or duplicate regulatory systems. Agri-food faces SPS scope and readiness questions; chemicals face duplicate compliance and regulatory decision-making questions; electricity access is tied to rule alignment and a level playing field [1][4][8][9][10][13]. This supports a sector-selective approach rather than a single answer for all alignment questions.

5.2.2. Observations: Defra says SPS alignment may affect approximately 500,000 businesses, including businesses operating entirely within Great Britain [8]. UK REACH states that the UK should take trusted jurisdictions, especially the EU, as the starting point, and align unless there are compelling reasons to diverge [13].

5.2.3. Added value: the Committee can require Government to publish a sector-by-sector Selective Alignment Test.

- Alignment should be justified by measurable access gains, duplicate-cost reduction or safety and network effects.
- Dynamic alignment should not be treated as one uniform question.
- Border digitalisation should be assessed by trader burden, not system launch dates.

5.2.4. Counterpoint: some sectors may value domestic flexibility more than alignment. Option A: align only within current negotiations. Option B: publish criteria for future alignment or divergence. Preferred: B.

5.3. Future cooperation frameworks and FTA compatibility

5.3.1. Comparator models such as EFTA, EEA, Switzerland, sectoral single markets or a customs union should be treated as constraint maps, not templates. They differ on market access, governance, mobility, financial contribution and compatibility with existing trade agreements. EFTA states that a new member must apply to become party to EFTA's existing FTAs, with terms agreed by existing parties [13].

5.3.2. Evidence gap: the reviewed public sources do not provide a single cross-government note setting out the compatibility of EFTA, EEA, customs union or defined-sector market options with UK trade agreements signed since EU exit. The Committee should request this through section 7.

5.3.3. Added value: the immediate Committee lever is not to choose a model, but to request a compatibility note.

- Comparator models should be assessed against legal process, speed, EU demands and FTA adjustments.

- Defined-sector markets may be faster than whole-economy models, but can still require dynamic alignment and contributions.
- Reining back cooperation would preserve flexibility but increase frictions where rules diverge.

5.3.4. Option A: continue only current reset files. Option B: request a published legal and trade-compatibility matrix. Preferred: B.

5.4. Defence and economic security

5.4.1. UK-EU defence cooperation is most relevant to this inquiry where security and economic resilience overlap: defence industrial base, sanctions, critical infrastructure, military mobility, cyber and external economic security. The UK-EU Security and Defence Partnership provides for regular dialogues, defence-industry exchanges and exploration of economic-security cooperation [12].

5.4.2. Observation: the partnership sets structures for dialogue and monitoring, but published trade-facing metrics are limited [12].

5.4.3. Added value: economic security should be tested through joint mechanisms and deliverables, not only general cooperation language.

- Defence industrial cooperation should avoid fragmentation where joint procurement or standards can help.
- Economic coercion, sanctions and critical-infrastructure resilience require shared risk assessment.
- Bilateral NATO-partner routes may be faster for some capabilities.

5.4.4. Option A: use existing dialogues. Option B: publish a joint workplan for economic-security trade measures. Preferred: B.

5.5. Business and stakeholder engagement

5.5.1. Public evidence shows Government has issued SPS readiness messages and a call for information, but this does not yet prove sufficient engagement. Defra says detailed sector-specific guidance will be published once negotiations conclude, expected later in 2026 [8].

5.5.2. Observation: the 500,000 affected-business estimate is the right starting point for testing engagement coverage, but the underlying denominator and sector split are not yet public [8].

5.5.3. Added value: we infer from the gap between the SPS estimate and HMRC customs-trader count that engagement should be audited across domestic supply chains as well as direct importers and exporters [5][8].

- Engagement should be measured by who was reached, not only whether guidance exists.
- Domestic supply chains need attention, not only direct exporters and importers.
- Devolved and local delivery bodies should be visible in the owner map.

5.5.4. Option A: rely on trade bodies and email alerts. Option B: publish an engagement coverage pack. Preferred: B.

6) Recommendations

6.1. Quick win, Committee lever: ask Cabinet Office to deposit a reset delivery tracker within three months. It should list owner, milestone, sector, dependency, guidance output and RAG status. Check: quarterly public update.

6.2. Quick win, delivery action: Defra and DBT should publish the SPS affected-business methodology within six months. Check: sector, firm size, geography, domestic-only and trader-status breakdowns.

6.3. Quick win, Committee lever: ask HMRC to extend the customs trader population release with sector and size cross-tabs from the next annual release. Check: annual EU-only, non-EU-only and both-market counts.

6.4. Structural, delivery action: Government should adopt a Selective Alignment Test within six months, and before any new sector file is agreed. Check: each sector note states access gain, compliance cost, domestic flexibility value, legal mechanism and lead time.

6.5. Structural, Committee lever: ask NAO or departments for a short reset-border dependency note within three months of the Committee's request, and before final report drafting where possible. Check: SPS, Single Trade Window, trusted trader schemes and guidance are linked to named owners.

7) Quant-lite results and Minimum Data Request Pack

7.1. Metric 1, trader-composition divergence: non-EU-only minus EU-only customs traders widened by 14,576 businesses, from 23,185 in 2024 to 37,761 in 2025. Formula: `(144,381 - 106,620) - (132,148 - 108,963)`. Percentage: 63%, denominator n=23,185. Caveat: counts are not trade values [5].

7.2. Metric 2, SPS implementation reach factor: Defra's approximately 500,000 affected businesses divided by HMRC's 362,992 customs-declaration businesses gives 1.38x, rounded to 1.4x. Denominator note: these are not identical populations; this is a reach proxy, not a rate [5][8].

7.3. Metric 3, border delivery premium: £537 million minus £469 million gives £68 million, or 14.5%, rounded to 15%. Denominator: £469 million. Caveat: modelled annual trader cost, not observed outturn [7].

7.4. Minimum Data Request Pack:

Field	Definition	Owner	Cadence	Enables test
Affected SPS businesses	Count and denominator by sector, size, geography, trader status	Defra/DBT	Quarterly until launch	Engagement coverage
EU-only traders	Businesses moving goods only with EU	HMRC	Annual	Trader participation

Border dependency RAG	STW, trusted trader, SPS and guidance status	Cabinet Office/HMRC/Defra	Quarterly	Delivery risk
Guidance issued	Sector guidance date and audience	Defra/DBT	Monthly pre-launch	Readiness
Alignment rationale	Access gain, cost, flexibility, legal route	Lead department	Per sector	Selective alignment
Business unresolved asks	Issues raised but not resolved	DBT/Defra	Quarterly	Engagement quality
FTA compatibility matrix	Compatibility of EFTA, EEA, customs union and sectoral market options with existing UK FTAs, including required renegotiation steps	DBT/Cabinet Office	One-off	Model feasibility

8) Impact, performance and value-for-money artefact

8.1. The Committee could request a one-page performance return for each reset file:

- objective and legal route;
- owner and delivery dependencies;
- affected businesses and sectors;
- baseline cost or friction;
- expected benefit and timing;
- implementation risk;
- evidence gaps;
- next public reporting date.

8.2. Candidate reporting metrics, not all computed here: EU-only trader count; both-market trader count; SPS affected-business coverage; guidance issuance by sector; trusted trader delivery status; Single Trade Window delivery status; border trader-cost assumption; sector alignment rationale published.

9) Committee may wish to ask

9.1. Cabinet Office: who owns the overall UK-EU reset delivery tracker, and when will it be published?

9.2. DBT: what is the single cross-government test for choosing alignment, divergence or cooperation in a sector?

9.3. Defra: what is the method behind the approximately 500,000 affected SPS businesses?

9.4. HMRC: will the customs trader population release be expanded by sector, size and continuing versus new trader status?

9.5. DESNZ: what conditions would attach to participation in EU electricity market arrangements?

9.6. Cabinet Office and HMRC: what are the current RAG ratings for Single Trade Window and trusted trader dependencies?

9.7. FCDO/MOD/DBT: which economic-security deliverables will be reported under the UK-EU Security and Defence Partnership?

10) Risks, further work, references and Annex A

10.1. Risks and further work:

- Do not treat mandates as completed agreements.
- Do not treat business counts as trade-value change.
- Do not reuse old cost estimates without updating denominators.
- Separate Great Britain, Northern Ireland and UK-wide effects.
- Keep press releases as policy-announcement evidence, not outcome evidence.
- Request missing denominators before concluding engagement is sufficient.

10.2. References:

[1] Cabinet Office, *UK-EU Summit: Common Understanding*, GOV.UK.
[2] Cabinet Office, *UK-EU Joint Statement*, GOV.UK, updated 22 December 2025.
[3] Council of the EU, *Council greenlights negotiations on agri-food deal and linking emissions trading systems*, 13 November 2025.
[4] Council of the EU, *Council greenlights talks on electricity and cohesion deals, as well as UK's participation in Erasmus+ for 2027*, 30 March 2026.
[5] HMRC, *Customs importer and exporter population 2025*, GOV.UK.
[6] ONS, *UK trade: February 2026*, 16 April 2026.
[7] National Audit Office, *The UK border: Implementing an effective trade border*, 20 May 2024.
[8] Defra/DBT, *Businesses urged to take simple steps for smoother trade with the EU*, GOV.UK, 9 March 2026.
[9] Defra, *UK-EU SPS Agreement: Legislation in scope*, GOV.UK, 9 March 2026.
[10] Defra, *UK trade in Food, Feed and Drink, 2024 updated*, GOV.UK.
[13] Defra, *Alternative transitional registration model for UK REACH: summary of responses and government response*, updated 30 March 2026.
[12] FCDO/MOD, *Security and defence partnership between the EU and the UK*, GOV.UK, 19 May 2025.
[13] EFTA, *FAQs, accession to EFTA FTAs*.

10.3. Annex list: Annex A, evidence ledger.

Annex A: Evidence Ledger

Claim	Type	Source A	Source B and role	Status	Confidence	Change-my-mind test	Owner

Reset progress is clearest where formal negotiation routes exist	SYNTHESIS	[1]	[3][4], independent EU corroboration	INPUTS-ANCHORED	Medium, because mandates are not agreements	Signed agreements slip or narrow materially	Cabinet Office
Trader-composition gap widened by 63%	RESTATEMENT	[5]	[6], context only	ORIGIN-ANCHORED	High for arithmetic, medium for interpretation	Sector split shows temporary concentration	HMRC
SPS implementation should be tested beyond direct customs traders	SYNTHESIS	[8]	[5], cross-source contrast	INPUTS-ANCHORED	Medium, because denominators are not like-for-like	Defra denominator mostly direct traders	Defra/DBT
Border delay has a measurable cost premium	RESTATEMENT	[7]	No Source B, single-source	SINGLE-SOURCE	High, because NAO model and arithmetic are explicit	Live cost model materially revised	Cabinet Office/HMRC