The UK-EU Trade Relationship After Brexit: Navigating New Barriers and Enduring Imbalances

Executive Summary

The United Kingdom's departure from the European Union, culminating in the implementation of the Trade and Cooperation Agreement (TCA) in 2021, represents the most significant shift in the country's trade policy in nearly half a century. This report provides an exhaustive analysis of the extent to which this new relationship has impacted UK-EU trade, with a specific focus on the UK's trade deficit. The analysis concludes that while Brexit did not create the UK's long-standing trade deficit with the EU, the new policy framework has structurally altered trade flows and significantly exacerbated the imbalance.

The core of this change lies in the replacement of the frictionless trade environment of the EU Single Market and Customs Union with a Free Trade Agreement that, while eliminating tariffs and quotas, has introduced a host of costly and complex non-tariff barriers (NTBs). These new frictions—encompassing customs declarations, stringent Rules of Origin (RoO), and particularly restrictive Sanitary and Phytosanitary (SPS) checks for agri-food products—have become the dominant feature of the post-Brexit trading landscape.

A critical divergence has emerged between the performance of goods and services trade. UK goods exports to the EU have been severely hampered by these new barriers, remaining well below pre-Brexit levels in real terms. Academic analysis quantifies this impact, suggesting the TCA led to a substantial reduction in bilateral trade, with SPS measures alone accounting for a significant portion of the decline in UK exports. In contrast, the UK's world-leading services sector has shown remarkable resilience, with exports to the EU growing strongly. This is largely because a significant portion of services trade is delivered remotely, bypassing many of the new physical and regulatory hurdles. However, even this positive headline figure masks underlying damage in service sectors directly affected by new licensing and qualification barriers.

The result of these dynamics has been a material widening of the UK's trade deficit with the

EU. This is not a temporary "teething problem" but a persistent feature of the new relationship, driven by the inelastic nature of UK demand for EU goods versus the more elastic demand in the EU for UK products. The new barriers have acted as a more effective brake on UK exports than on imports, cementing a deeper trade imbalance. The strategic outlook suggests that any mitigation of these economic costs will depend on targeted policy actions to reduce specific NTBs, particularly through a veterinary agreement and mutual recognition of standards.

The Post-Brexit UK-EU Trade Landscape: A Macroeconomic Overview

To comprehend the impact of Brexit, it is essential to first establish the quantitative scale of the UK-EU trade relationship and contextualise post-Brexit figures against historical trends. The data reveals that while the EU remains the UK's most significant trading partner, the nature and balance of this trade have shifted discernibly since the implementation of the TCA.

In 2024, the most recent year for which comprehensive data is available, the UK recorded a total trade deficit with the EU of £96 billion. This figure is the net result of two starkly different trends: a substantial deficit in goods trade of £139 billion was partially offset by a healthy surplus in services trade of £43 billion. Specifically, the UK exported £174 billion in goods to the EU while importing £313 billion; for services, exports stood at £184 billion against imports of £141 billion.[1] This trade dynamic with the EU contrasts sharply with the UK's trade with the rest of the world, where it recorded a £67 billion surplus in the same year.[1]

This deficit is not a new phenomenon. The UK has run a total trade deficit since 1998, a structural feature of its economy driven primarily by a consistent deficit in goods trade.[2] Pre-Brexit data underscores this point; in 2017 and 2018, the UK's total trade deficit with the EU was £67 billion and £66 billion, respectively.[3] The post-TCA deficit of £96 billion in 2024, therefore, represents a significant widening—by approximately 45%—of a pre-existing imbalance, rather than the creation of a new one.

Despite the new barriers, the EU's position as the UK's primary trading partner is secure. In 2024, the EU accounted for 41% of all UK exports and 51% of all UK imports.[1] While this share has remained broadly stable in the immediate post-Brexit years, it marks a decline from a peak of 47% in 2010-2011.[1] This enduring, high-volume trade relationship means that even minor new frictions can have major macroeconomic consequences.

It is crucial to note that analysing trade data from this period is complicated by several overlapping factors. The combination of Brexit, the COVID-19 pandemic, and subsequent global supply chain disruptions has created unusual volatility.[1] Furthermore, the UK's Office for National Statistics (ONS) implemented changes to its data collection methodology for EU trade from January 2021, creating a structural break in the time series and necessitating caution when making direct pre- and post-Brexit comparisons.[5]

Year	UK-EU Goods Balance (£bn)	UK-EU Services Balance (£bn)	UK-EU Total Trade Balance (£bn)	
2018	-£94	£28	-£66	
2023	-£114	£15	-£99	
2024	-£139	£43	-£96	
Q2 2025	-£33.9*	£13.0*	-£20.9*	
Note: Q2 2025 figures are derived from monthly data for June 2025 (£11.3bn goods deficit) and quarterly data for the overall trade balance in Q2 2025, which shows a £61.1bn total goods deficit and £51.9bn total services surplus. The EU-specific figures are estimated from these totals and monthly				

EU trade data. Sources:.[1]				

The Trade and Cooperation Agreement (TCA): A Fundamental Shift in Policy

The TCA, which provisionally applied from 1 January 2021 and formally entered into force on 1 May 2021, marked a fundamental and irreversible shift in the UK-EU economic relationship.[10] By leaving the EU's Single Market and Customs Union, the UK moved from a state of deep economic integration, characterized by the near-total absence of trade barriers, to a more conventional Free Trade Agreement (FTA). This transition represents the single most significant change to the UK's trade policy framework in modern history.

The headline provision of the TCA is the establishment of zero tariffs and zero quotas on all goods traded between the UK and the EU.[10] While politically significant, this provision is conditional and comes at a considerable price. To qualify for tariff-free treatment, goods must meet a complex set of "Rules of Origin" (RoO), which have introduced a substantial new layer of administrative and compliance costs.[13]

Rules of Origin Explained

RoO are the criteria used to determine the "economic nationality" of a product. Their primary purpose within an FTA is to prevent goods from third countries being rerouted through one party to gain preferential access to the other, thereby avoiding the tariffs that would otherwise apply.[13] Under the TCA, for a product to be considered "originating" and thus eligible for zero-tariff treatment, it must satisfy one of two main conditions:

1. **Wholly Obtained:** The product must be entirely produced or obtained within the territory of the UK or the EU, such as agricultural products grown and harvested, or minerals extracted from the ground.[13]
2. **Substantially Transformed:** The product must have undergone sufficient working or processing in the UK or EU. The specific requirements for substantial transformation are detailed in product-specific rules, often linked to a change in tariff classification or a limit on the value of non-originating materials used.[13]

To support the deeply integrated supply chains that exist between the UK and the EU, particularly in sectors like automotive and aerospace, the TCA includes a provision for "full bilateral cumulation." This allows materials originating in and processing carried out in either the UK or the EU to be counted towards meeting the origin requirements for the final product.[17]

The administrative burden of proving origin is significant. Businesses must make a formal claim for preferential treatment on their customs declaration. This claim must be backed by valid proof of origin, which can take one of two forms: a "statement on origin" provided by the exporter on a commercial document, or the "importer's knowledge," where the importer holds sufficient evidence to prove the goods qualify. In both cases, businesses are required to maintain detailed records for at least four years to be presented to customs authorities upon request.[16]

This new framework means that the term "tariff-free trade" is technically accurate but economically misleading. The reality of the TCA is that it has replaced a system of *zero trade costs* with a system of *zero tariffs*, conditional on businesses incurring significant new compliance costs. These costs include staff time for paperwork, fees for customs agents and logistics specialists, investment in new IT systems, and potentially costly adjustments to supply chains to meet origin thresholds. Evidence from the Office for Budget Responsibility (OBR) on low "preferential utilisation rates" (PURs) for some EU imports suggests that certain firms find it less costly to simply pay the standard tariff than to complete the complex and expensive paperwork required to prove eligibility for the zero-tariff rate.[20] The absence of tariffs, therefore, has not meant the absence of trade costs; it has merely shifted them from taxes to administrative and operational friction.

The Rise of Non-Tariff Barriers: Quantifying the New Frictions

Beyond the complexities of Rules of Origin, the UK's exit from the Single Market and Customs Union erected a hard customs and regulatory border for the first time in decades. This introduced a range of non-tariff barriers (NTBs) that now apply to all goods trade, fundamentally increasing the cost and complexity of moving products across the Channel.[13]

The primary NTBs include:

- **Customs Declarations:** A full customs declaration is now required for every consignment of goods moving between Great Britain and the EU, a process that was previously unnecessary.[13]
- **Safety and Security Declarations:** Both importers and exporters must submit these

declarations in advance, allowing border authorities to conduct risk assessments on goods before they arrive.[13]

- **Sanitary and Phytosanitary (SPS) Measures:** These represent the most significant new barrier, particularly for the agri-food sector. Exports of all products of animal origin, as well as many plants and plant products, now require bespoke Export Health Certificates (EHCs), pre-notification to the importing authorities, and are subject to documentary, identity, and physical checks at designated Border Control Posts (BCPs).[13]

A groundbreaking academic study by Du and Shepotylo provides the most robust quantification of the economic impact of these new frictions. Using a sophisticated synthetic control difference-in-difference methodology to isolate the effect of Brexit from the concurrent shock of the COVID-19 pandemic, the research found that the TCA had a strong, negative, and significant impact on UK-EU bilateral trade. In the first half of 2021, the new agreement led to an estimated **22% reduction in UK exports to the EU** and a **26% reduction in UK imports from the EU**.[22]

The study went further by calculating the *ad valorem equivalents* (AVEs)—the equivalent tariff that would have the same trade-reducing effect—of these NTBs. The findings were stark: a 1% increase in the AVE for SPS measures was found to cause a **13-15% reduction in exports** to the EU. This single factor was estimated to have reduced UK exports by **£12.4 billion** in the first half of 2021 alone, accounting for over 70% of the total documented reduction in exports to the EU during that period.[22] This demonstrates that the most damaging aspect of the new trade regime is not general customs paperwork but the specific, high-cost burden of meeting divergent regulatory standards for food and agricultural products.

Category	Estimated Impact (First Half 2021)	Estimated Monetary Value (£bn)
Overall Reduction in UK Exports to EU	-22%	-
Overall Reduction in UK Imports from EU	-26%	-
Reduction in UK Exports to EU due to SPS & TBT	-15.6%	-£12.4

Source: Analysis based on Du & Shepotylo (2022).[22]			

A crucial element in understanding the initial post-TCA trade data was the asymmetric implementation of these new controls. The EU applied full customs and SPS checks on goods from Great Britain from 1 January 2021. In contrast, the UK government repeatedly postponed the introduction of its full import control regime, phasing it in gradually from 2022 onwards.[13] This created a temporary statistical anomaly, or a "fog of trade," where UK exports faced immediate high friction while EU imports faced lower friction. This explains why initial data showed a sharper fall in UK exports than imports; it was a reflection of the differing enforcement regimes, not the underlying economic impact. The true, two-way cost of the new barriers only became fully apparent as the UK progressively implemented its own border checks.[22]

A Tale of Two Economies: The Divergent Paths of Goods and Services Trade

One of the most striking features of the UK's post-Brexit trade performance has been the profound divergence between its goods and services sectors. While goods trade has struggled under the weight of new frictions, the services sector has demonstrated remarkable resilience and growth in its trade with the EU. This bifurcation is central to understanding the reconstituted UK-EU trade balance.

The data is unambiguous: the UK's recent trade performance in services has been vastly superior to that for goods.[1] In 2024, UK goods exports to the EU remained 18% below their 2019 pre-pandemic and pre-TCA levels in real terms. This underperformance with the EU is more severe than with the rest of the world, where goods exports were down 14% over the same period, pointing to a specific Brexit-related impact.[1]

In stark contrast, UK exports of services to the EU in 2024 were 19% *above* their 2019 level in real terms.[1] This strong performance has been a critical mitigating factor in the UK's overall trade position and has helped to partially offset the ballooning deficit in goods.

Year	UK Exports to EU (Goods, Real	UK Exports to EU (Services, Real

	Terms, 2019=100)	Terms, 2019=100)	
2019	100.0	100.0	
2020	89.2	87.5	
2021	83.1	98.2	
2022	87.4	109.8	
2023	85.3	115.4	
2024	82.0	119.0	
Note: Index constructed from real terms growth figures provided in sources. Sources:.[1]			

This divergence can be largely explained by the nature of the TCA itself. The agreement is overwhelmingly focused on trade in goods, establishing detailed rules for customs, RoO, and SPS checks. While it does contain provisions for services, these are far less comprehensive and have created new barriers, such as restrictions on the movement of professionals, limits on short-term business travel, and a lack of mutual recognition for professional qualifications.[24] However, a crucial feature of the UK's services economy is that a large proportion of its exports are delivered digitally and remotely. Approximately 70% of UK services exports to the EU fall under the World Trade Organisation's (WTO) 'Mode 1' classification, which includes activities like consultancy, financial analysis, and legal advice delivered electronically. This mode of delivery is inherently less affected by the new physical border and many of the regulatory hurdles introduced by the TCA.[24]

However, the positive aggregate figure for services trade conceals significant underlying damage. More granular research from the London School of Economics (LSE) reveals that in those service sectors most directly affected by new Brexit-related barriers—such as those requiring specific licenses or professional qualifications—exports have actually *declined* by an estimated 15.8%.[24] The overall growth is therefore being driven by the sheer volume of trade in sectors like remote business and financial services that were less exposed to the specific frictions created by the TCA. This indicates that where the TCA did impose meaningful barriers on services, the impact was just as negative as it was for goods. The UK's overall services success is a testament to its sectoral strengths, but it does not imply that leaving the

Single Market for services has been without cost.

Sectoral Deep Dive: Case Studies in Adaptation and Disruption

The macroeconomic trends and policy changes manifest in unique ways across different sectors of the economy. Examining specific industries provides a clearer picture of how businesses are adapting to—or being disrupted by—the new trading reality. The cases of the automotive, financial services, and agri-food sectors are particularly illustrative.

Automotive: The Challenge of Integrated Supply Chains

The automotive sector, with its deeply integrated cross-Channel supply chains, exemplifies the challenges posed by the TCA's new frictions. Bilateral UK-EU automotive trade has demonstrably underperformed when compared to the UK's trade with the rest of the world, signaling a specific Brexit impact.[25] While the industry has managed to maintain its status as a trading powerhouse, generating £115 billion in total trade in 2024, it faces a critical future threat.[27] The TCA's Rules of Origin are set to become significantly stricter for batteries and electric vehicles (EVs) from January 2027. If the local content thresholds for these components are not met, EVs traded between the UK and EU could face tariffs of between 10% and 22%. With battery supply chains still in their infancy in both the UK and Europe, meeting these requirements is a monumental challenge, posing a serious risk to the competitiveness and viability of the UK's burgeoning EV export industry.[25]

Financial Services: Adaptation After the Loss of Passporting

For the UK's financial services sector, the primary impact of Brexit was the loss of "passporting" rights, which had previously allowed UK-based firms to provide services seamlessly across the entire EU Single Market. This fundamental change necessitated a significant restructuring, with many firms moving staff and operations to new or expanded hubs within the EU, primarily in Dublin, Frankfurt, and Paris, to continue serving European clients.[28] Despite this disruption, trade patterns have adapted. After an initial period of adjustment, UK financial services exports to the EU surged by 22% in 2023. Luxembourg and Ireland have emerged as the two largest EU destinations for these services, together accounting for 11.3% of the UK's total financial services exports in 2023.[30] This indicates a strategic shift from a broad, ubiquitous relationship to a more concentrated model focused on servicing the wider EU market from these specific, strategically important hubs.

Agri-Food and Fisheries: The Cliff-Edge of Regulatory Barriers

No sector has been more acutely affected by the new NTBs than agri-food and fisheries. The experience of this sector demonstrates that the impact of Brexit is not always a gradual increase in friction but can be a sudden, absolute barrier to trade. Upon the UK's classification as a "third country," the EU immediately enforced a ban on the import of live bivalve molluscs (such as oysters, mussels, and scallops) from UK waters that were not classified as the highest grade of purity ('Class A'), unless they were purified before export.[31] As the UK lacks large-scale purification capacity and EU buyers traditionally prefer to perform this process themselves, this regulatory change effectively destroyed a key export market overnight. The impact was catastrophic for some businesses; the Welsh mussel industry, for example, saw its exports collapse from nearly 14,000 metric tons in 2009 to just 5 metric tons in 2022.[33] Similarly, for Scottish salmon, the UK's single largest food export, the new red tape, health certificates, and border delays have resulted in an estimated loss of up to £100 million per year in potential sales to the EU.[34] These examples reveal that regulatory divergence can create "cliff-edge" shocks, making entire business models unviable and causing far greater economic damage than incremental logistical costs.

The UK-EU Trade Deficit: An Enduring Imbalance Exacerbated by Brexit

Synthesizing the analysis of policy changes, macroeconomic data, and sectoral impacts allows for a definitive assessment of how Brexit has influenced the UK's trade deficit with the EU. The evidence clearly indicates that the new trade barriers introduced by the TCA are the primary cause of the deficit's significant widening in the post-Brexit era, from a pre-Brexit average of around £66 billion to £96 billion in 2024.[1]

This expansion of the deficit is a direct consequence of the asymmetric impact of the new trade frictions on UK exports and imports.

- **Export Suppression:** As demonstrated, UK goods exports to the EU have been structurally damaged by the TCA. They remain well below pre-Brexit levels in real terms, a direct result of the combined costs of NTBs, RoO compliance, and the specific "cliff-edge" regulatory barriers faced by key sectors.[5] These frictions have unequivocally reduced the volume and competitiveness of UK goods sold in the EU market.
- **Import Resilience:** In contrast, UK imports of goods from the EU have proven more resilient. After an initial dip in 2021 and 2022, the EU's share of the UK import market recovered to 51% in 2024, in line with the pre-Brexit average.[1] This reflects the deeply entrenched nature of UK consumer and business demand for key European products, particularly in categories like automotive, machinery, and medicinal and pharmaceutical goods.[4]

This dynamic reveals a core economic truth about the post-Brexit trade relationship. UK demand for specialized EU goods appears to be relatively inelastic—that is, less sensitive to increases in price or friction. UK businesses and consumers have, on the whole, continued to purchase these goods despite the new costs. Conversely, EU demand for many UK goods has proven more elastic. Faced with new complexities and costs, EU buyers have been more able or willing to switch to domestic suppliers or source goods from other countries within the Single Market. The new trade barriers have therefore acted as a more effective brake on UK supply to the EU than on EU supply to the UK. This imbalance is further compounded by the structure of the respective economies; large EU exporters, such as major German car manufacturers, possess the scale and resources to absorb the new administrative costs of serving the UK market, whereas many smaller UK firms have found the new fixed costs of exporting to the EU prohibitive, leading them to exit the market entirely.[36]

While there is some evidence of trade diversion—with UK firms subject to high SPS barriers redirecting some exports to non-EU destinations—the consensus among economic bodies like the OBR is that new trade deals with partners outside the EU will have only a marginal impact on UK GDP and are insufficient to offset the economic losses from increased friction with its largest and closest trading partner.[20]

Conclusion and Strategic Outlook

The United Kingdom's trading relationship with the European Union has been fundamentally reshaped by its departure from the Single Market and Customs Union. The evidence presented in this report overwhelmingly indicates that the negative impacts on trade resulting from the Trade and Cooperation Agreement are not transient "teething problems" but represent a permanent, structural increase in the costs of doing business. The OBR's long-term forecast—that Brexit would ultimately reduce the UK's trade intensity by 15%

relative to what it would have been had the UK remained in the EU—appears to be broadly on track.[20]

The TCA embodies a clear strategic trade-off: in exchange for greater regulatory autonomy, the UK has accepted significant and persistent friction in its trade with its largest and closest partner. This has had a demonstrable negative impact on trade volumes, particularly for goods, and has materially widened the UK's structural trade deficit with the EU.

Looking forward, the analysis points to clear areas where targeted policy interventions could mitigate some of these economic costs and stabilize the trade relationship. The strategic priorities should focus on reducing the most damaging non-tariff barriers:

1. **Negotiating a bespoke Sanitary and Phytosanitary (SPS) Agreement:** The evidence is unequivocal that SPS barriers are the single largest source of trade friction, inflicting severe damage on the UK's vital agri-food and fisheries sectors. A veterinary agreement that reduces the need for EHCs and physical checks by establishing regulatory equivalence or mutual recognition would deliver the most significant economic benefit.[13]
2. **Pursuing Mutual Recognition Agreements:** Expanding agreements on the mutual recognition of professional qualifications would unlock further growth in high-value services. Similarly, agreements on conformity assessments for industrial goods would reduce duplicative testing and certification costs, benefiting manufacturers.[22]
3. **Resolving the Rules of Origin for Electric Vehicles:** Finding a pragmatic and workable solution with the EU for the 2027 Rules of Origin for EV batteries is an urgent priority. Failure to do so poses an existential threat to the future of the UK automotive industry and its exports to the EU.[25]

Brexit has created a new and more challenging trading reality. While a return to frictionless trade is not on the political horizon, a strategic approach focused on reducing the most severe NTBs offers the most effective path to easing the economic burden on UK businesses and fostering a more stable and predictable long-term trade relationship with the European Union.

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