#### **RIETI-CEPR Workshop**

# Brexit: On the future of the UK and the global economy

#### Handout

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http://www.rieti.go.jp/en/index.html

# Brexit: Trade & International Production Network Issues

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### Outline: British + EU exit = Brexit

- Introduction
- Background facts & economic logic
- The Divorce
- The Re-Marriage
- Conjectures about the future
- Some guesses

- Terminology:
  - "Leave" = vote to leave EU; "Remain" = vote to stay in EU.

## Introduction: It's messy

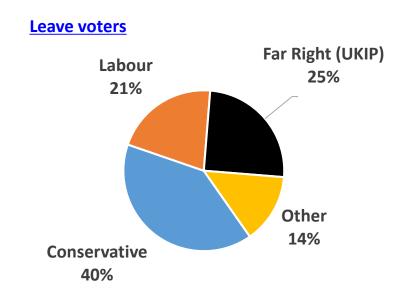
- Brexit would be easy if it meant just leaving the EU.
- Messy part is "what comes next".
- Basic source of uncertainty:
  - The "Leave" campaign was deeply divided over post-Brexit plans, and so did not present a clear vision for post-Brexit plans to voters.
    - Thus we know what voters were <u>against</u>, but not what they were <u>for</u>.
  - Hard choices are inevitable, but current government is deeply divided over post-Brexit plans.
    - Don't even know if UK will be in the EU Customs Union or not.

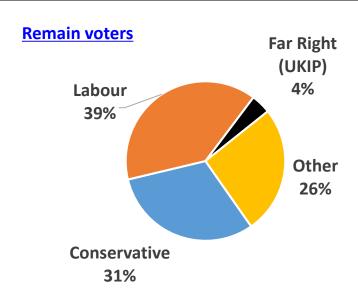
 RESULT is uncertainty: We still don't know what comes after UK leaves EU.

# The Vote results overall: 52% Leave; 48% Remain

| Who voted "Leave"?                         | Who voted "Remain"?                           |
|--|---|
| Majority of old people (over 45 years old) | Majority of young people (18 to 44 years old) |
| Majority of retired people                 | Majority of working people                    |
| Majority of people without jobs            | Majority of <b>u</b> niversity graduates      |

#### The vote was NOT primarily by political party (except far-right):

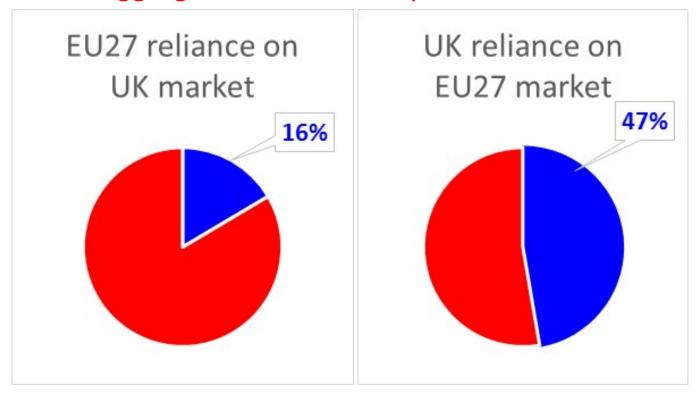




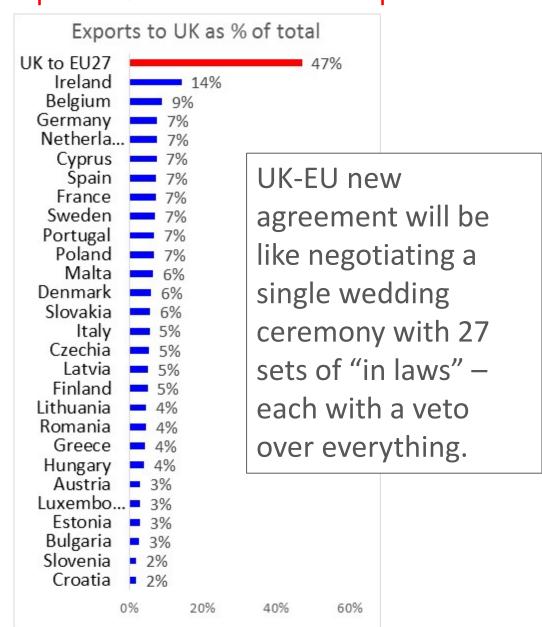
# Background facts & economic logic

Asymmetric export dependency → asymmetric bargaining power

#### #1: In aggregate UK in a weak position vs EU

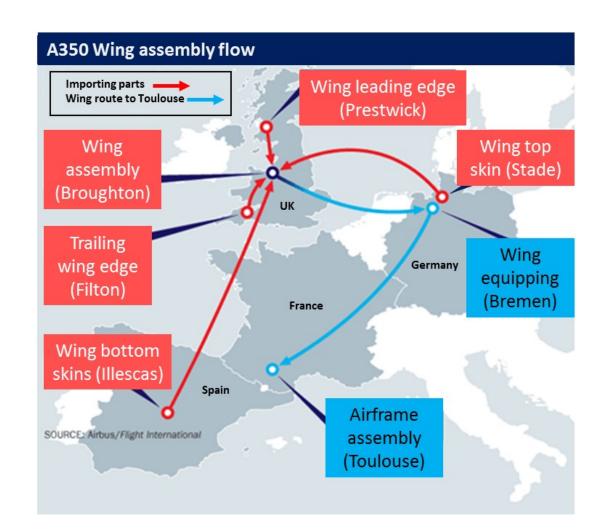


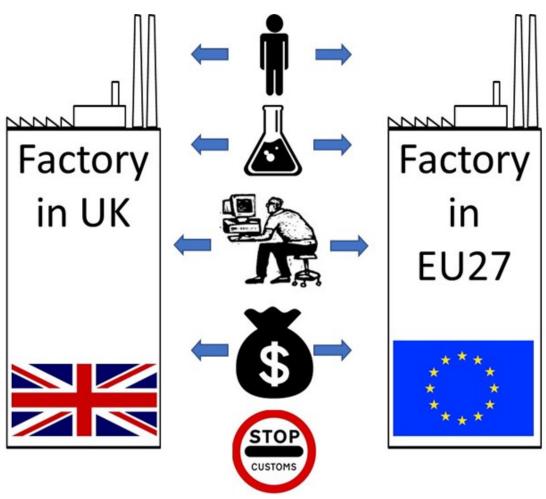
## #2: UK vs 27 EU members: 14 of 27 spend 5% or less of their exports to UK



### Brexit & production networks:

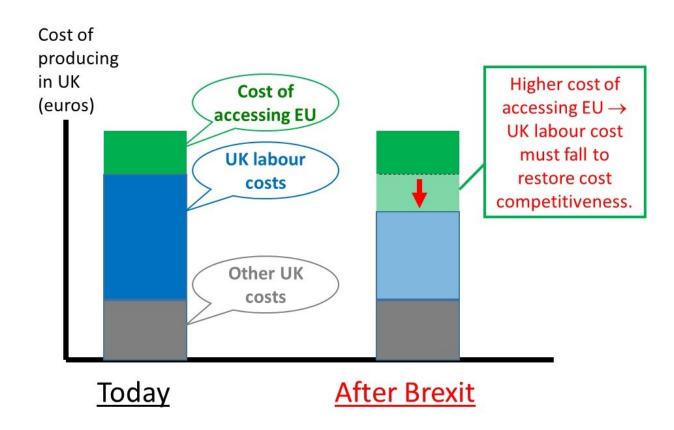
- Two-way flows of Goods, Services, Knowledge, Technicians, etc.
- Factory Europe relies on Single Market rules





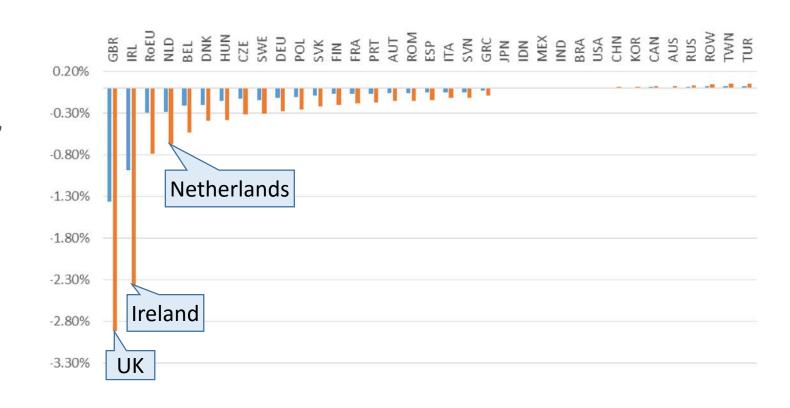
## Brexit & economic adjustment

- Brexit → make UK-based production more expensive.
- To restore competitiveness:
  - Some production leaves UK for EU;
  - UK wages fall somewhat relative to EU wages.
    - The 20% fall in £ has already done this.
- UK's adjustment will be much larger than EU27's adjustment.



### Economic impact estimates

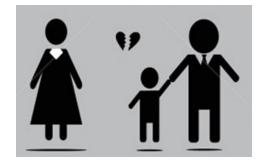
- UK loses much more then EU27 nations.
- For most EU27 nations, impact of UK crashing out of EU (Pessimistic Scenario), are very small (under 0.3% of GDP).
- UK's loss is ten times that.
  - NB: Ireland has very close ties to UK economy.



- Optimistic Scenario (Norway) trade costs 个 by 2%;
- Pessimistic Scenario (WTO) trade costs ↑ by +6%

## Legal aspects of Brexit

- Two parts of Brexit process
  - "Divorce"



• "Re-marriage"



- Exit governed by Article 50 of Lisbon Treaty.
- Key points:
  - UK chooses when to trigger beginning of exit talks.
  - Talks last 2 years (unless unanimous agree to extend – which might happen).
    - If no agreement, UK ceases to be a member; EU puts tariffs back up, etc.
  - EU decision on divorce issues is by majority voting (easy);
  - Vote on re-marriage probably requires unanimity (since 'mixed agreement').

## Divorce issues (relatively easy)

#### **Money**

- Amount UK must pay for continuing programmes it committed to in past.
  - e.g. Pensions of retired UK European Commission officials, unpaid bills for infrastructure projects in poor regions, etc
  - Current EU medium-term spending plan goes till end of 2020.

#### **People**

 Status of EU nationals in UK & British nationals in the EU

#### Administrative disengagement

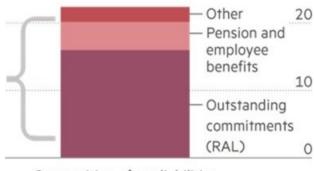
 For example, European Medicines Agency (now in London).

#### Special situations

 For example, Northern Ireland & Gibraltar.

#### Britain's exit bill?

UK's possible share of EU multi-year liabilities (€bn)

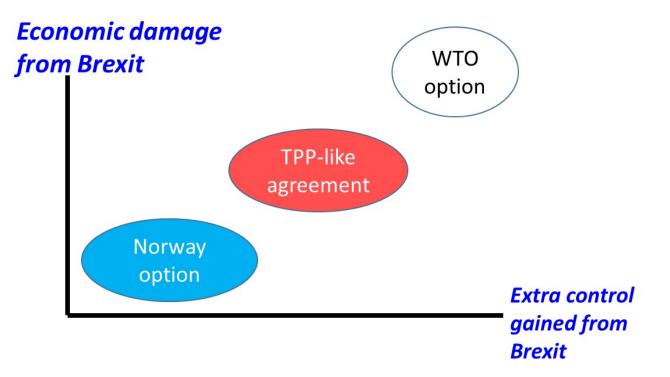


Composition of net liabilities

Source: EU data, FT research

## "Re-marriage" options (difficult)

- 1. Norway option:
  - "Stay in Single Market"
- 2. TPP-like agreement:
  - "No Single Market access"
- 3. WTO option:
  - "Crash out of EU"



## What is the EU's Single Market?

- Short Answer: Rules that support Factory Europe today
- Specifically: Free movement of goods, services, capital and people.
  - "Four Freedoms".
- Customs Union:
  - all EU members have same external tariffs.
- Regulatory harmonisation to ensure Four Freedoms:
  - "Approximation of laws".
- Democratic process to produce new EU laws on Single Market:
  - Complex process involving EU Members & EU Parliament.
- Adjudication of disputes:
  - EU Court is ultimate judge
  - European Court of Justice can over-rule national courts on Single Market matters.
- Cohesion payments:
  - Contribution to EU budget to pay for policies to help lagging regions.
- Dynamic arrangement:
  - All agree in advance to accept all new EU law on the Single Market.

# Option 1: 'UK stays in Single Market': <a href="Issues">Issues</a>

- Norway has this relationship with the EU.
- Note Norway is:
  - Not in EU Customs Union (can set different tariffs on imports from third nations)
  - Not in Single Market for agriculture & fishery (only for manufactured goods and all services).
  - Has no formal input into new EU laws, but is obliged to accept them regardless (= 'regulation without representation').
  - Does pay into EU budget.
  - Does accept EU Court as ultimate recourse for Single Market disputes that involve an EU member, or company.
    - There is also and EFTA Court for intra-EFTA issues.
- Norway participates via the "European Economic Area (EEA)" agreement.
- UK would have to re-join EFTA if it wanted EEA treatment.

# Option 1: 'UK stays in Single Market': <a href="Impact">Impact</a>

- This Brexit option would cause minimal disruption to trade & European production networks.
- Would allow UK financial sector to continue selling to EU27 as now.
- BUT would also reduce amount of control that UK wins back from Brexit.
- Would almost surely require unanimous approval of all 27 EU members and EU Parliament.

# Option 2: "Deep" trade arrangement (Comprehensive trade & production sharing deal)

- This would be trade agreement like NAFTA, or TPP, or Japanese "Economic Partnership Agreements" with big ASEAN nations.
  - <u>Would include</u>: duty-free trade in manufactured goods, some liberalisation of services trade, and rules to protect investors and intellectual property owners.
  - <u>Unlikely to include</u>: Customs Union, automatic Four Freedoms, automatic approximation of laws, Supremacy of EU Court, budget contribution.
    - EU-Canada agreement is often viewed as a model.

# Option 2: "Deep" trade arrangement (Comprehensive trade & production sharing deal)

- Would probably not allow UK financial sector to continue selling to EU27 as now.
  - So-called 'passporting' rights that mean UK regulation of banks has to be accepted as equivalent to national regulation in all EU27 nations.
  - Is important part of City of London's attraction as a hub for EU financial sector.
- This is <u>much less</u> economic integration than Single Market, and thus much more disruptive to Factory Europe, especially for the UK.
- BUT it would give UK much more control over its own policy.
- Factory North America, and Factory Asia work on the basis of such agreements.

# Option 3: WTO (no special deal with EU): "Crashing out of EU"

- If no UK-EU trade agreement, WTO rules require EU to charge usual tariffs.
  - MFN tariffs, rules of origin, no special cumulation of origin.
- This happens if UK leaves EU without a new trade deal
  - But, ongoing talks would probably be sufficient.
- This is the default option: UK treated as any other WTO member, like Japan.

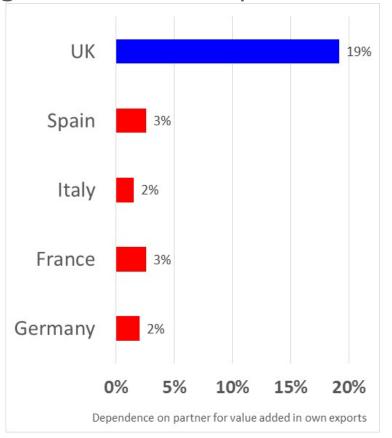
## Option 3: WTO (no special deal with EU):

### **Impact**

- This would be an economic train wreck.
- EU tariffs can be high, e.g. 4% on auto parts & 10% on autos.
- This would be very disruptive for Factory Europe, especially for UK.
- UK is attractive place to produce, but France, Italy, Germany, Poland are good substitutes and very nearby.
- Would hurt EU27 and UK, but UK much more.

#### Asymmetric dependence:

Value added in UK exports depends far more on parts & components from EU27 than the big EU carmakers depend on UK value added.



### Transitional issues

- Only WTO option would be "quick, easy and clean".
- Norway option & "Deep" trade agreement would take years to negotiate.
  - Complex trade agreements take 5 to 10 years to negotiate.
  - UK already in, so technically easier, but politics more complex due to need for EU27 to avoid a precedent.
  - Regardless, they can take another 2 years to implement (27 national parliaments and the EU Parliament).
    - Example of EU-Canada agreement (CETA)
- To avoid disruption, a transitional arrangement will be needed.
- But the transitional arrangement may turn into the permanent arrangement, so it will not be easy to agree.
  - Most natural would to be continue status quo, but that would require free movement of people.

## Non-EU trade issues facing UK

- 1. UK trade arrangements with non-EU nations.
- 2. Extracting UK from EU28 commitments in WTO.
- 3. Extracting UK from EU28 free trade agreements with third nations.

## Trade deals with non-EU nations:

Background

- EU28 is largest importer & exporter in world.
- Achieved strong position by acting together (not 28 separate trade strategies).
- EU28 has trade deals with most nations in the world.
- Brexit means UK would have to replicate these bilaterally.

#### Map of EU trade relations



- EU has trade agreements or is negotiating them with almost every nation in the world.
- Two-way agreements with about 70 nations.
- Unilateral tariff preferences granted to almost all the rest.

# Trade deals with non-EU nations: Problems

#### 1. Market power:

- UK is 5<sup>th</sup> largest economy in world, but much smaller than EU28.
- Other nations may demand more from UK than EU28 (leverage);
- They could also demand compensation from EU27 (smaller market).

#### 2. Sequencing:

- Until UK-EU trade deal is clear, other nations "cannot have a serious conversation about what an agreement with UK would look like" (USTR Mike Forman October 2016).
  - UK trade ties with 3<sup>rd</sup> nations, thus unlikely to start until transitional arrangement is agreed (in best of cases, this would be in 2018).

#### 3. Transitional issues:

- Even simple trade deals can take years to negotiate.
- Once UK leaves EU, EU28 deals cease to apply to UK.
- UK needs to make transitional arrangements to avoid sudden rupture of status quo trade arrangements.
- UK could probably agree a 'standstill' with most 3<sup>rd</sup> nations.

## Extracting UK from EU28 commitments in WTO: Background

- EU has negotiated as a block in GATT/WTO for over 40 years.
  - UK has been an important part of the EU block.
- Three sets of problems:
  - Changes to agreements that EU28 made.
  - New agreements that UK will have to make.
    - Probably have to be done simultaneously with EU28 renegotiation.
  - UK has to establish its own tariff schedule in the WTO.
- In principle, each WTO members has a veto on these changes.
- VERY lengthy process:
  - Took 15 years to agree similar issues arising from EU's 1995 enlargement from 12 to 15 members.
  - Talks on adjustments from 2004 are still underway.

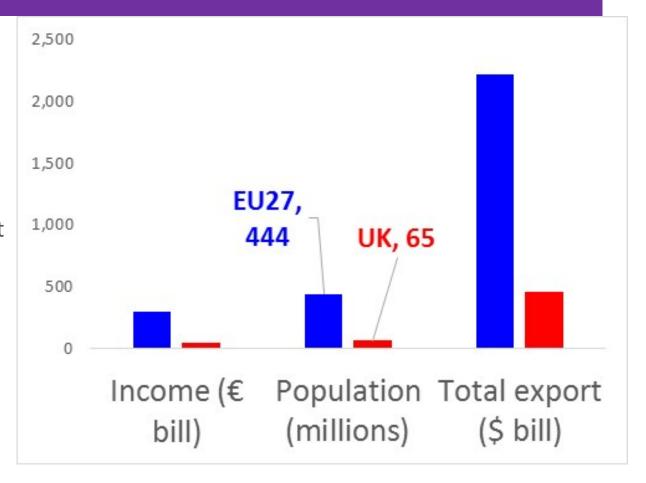
## Extracting UK from EU28 commitments in WTO: Issues

- When UK leaves EU, the deals made by EU28 have a different commercial value to non-EU nations.
- This will force a renegotiation of EU28 commitments among UK, EU27 and other 162 WTO members.
- For example, in the 1994 Uruguay Round deal, EU28 agreed to import 37,800 tonnes of high-quality beef.
- Dividing the 37,800 tonnes between UK and EU will involve difficult negotiations between UK & EU, and exporting nations.
  - Aggressive WTO members could, in principle, use the talks to renegotiate with EU27.
- Overall, probably a headache, but not a source of important disruptions (as long as everyone 'plays nice')

## Conjectures about the future

#### **Conditioning facts**

- EU27 is MUCH larger than the UK.
- EU27 national economies are deeply woven together by Single Market.
  - Politically & economically.
  - This was the plan from 1958; it worked.
  - Any threat to cohesion of the Single Market is threat to each EU27 economy.
- Asymmetric dependence:
  - EU27 market takes about 50% of UK exports;
  - UK takes only about 20% of EU27 exports.
- UK government (& voters) are deeply divided on correct UK-EU post-Brexit option.
- The 2 year deadline & cost to UK of WTO option gives EU27 strong hand in negotiations.



## High politics in EU

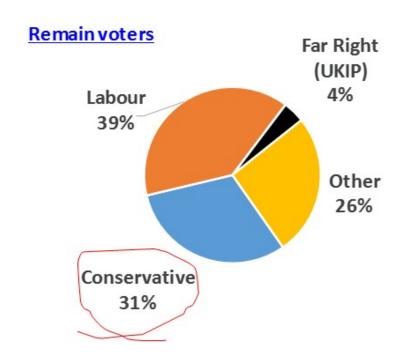
- Each EU27 members would like to pick & choose among Single Market measures.
  - They don't since the Single Market only works as a package deal, complex set of compromises agreed over decades.
- Allowing UK to pick & choose, would lead most EU27 members to ask for the same.
  - This would destroy cohesion of Single Market.
- Allowing Brexit to create an attractive alternative to EU membership would:
  - Encourage far-left & far-right anti-EU parties in many EU27 nations.
  - Encourage regional separatism in some EU27 nations (e.g. Catalonia in Spain).
- Germany & French elections:
  - Sitting governments will not want to be discussing clever, creative limits on migration with UK during campaigns.
  - Doing so would encourage demands by far-left and far-right parties.

## Low politics in EU

- Labour mobility is biggest issue in Brexit; also big issue in many EU27 nations, BUT
  - some EU27 are net 'exporters' of migrants; others net 'importers'.
  - Some welcome migrants, other not.
  - Some have a big problem with non-EU migrants, others not.
- Since new UK-EU deal will surely be a 'mixed agreement' (like EU-Canada), every EU nation and EU Parliament will have a veto.
- Unanimously agreeing a 'creative' deal with the UK is thus likely to be impossible.
  - Last reform effort (lead to 2009 Lisbon Treaty) took 10 years.
- CONCLUSION: Only solution EU27 can agree between now and March 2017 is status quo, i.e. the
  - Single Market: Take it or leave it (Norway Option).
  - OR
  - WTO option.
  - Deep agreement is possible, but will take many years.

## UK political situation: Brexit referendum issues

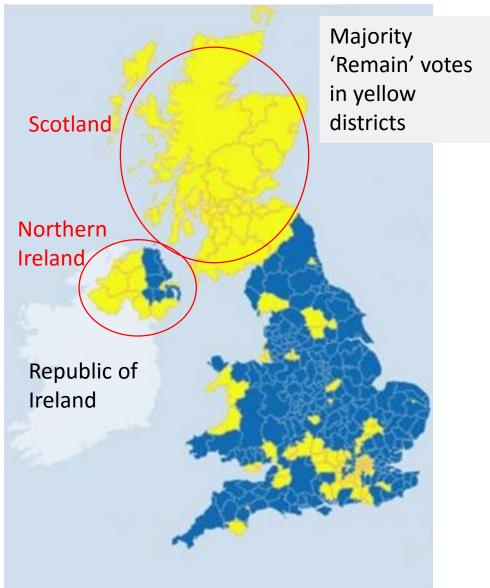
- Ruling Party (Conservatives) are deeply divided on Brexit (see charts).
  - <u>Idealists</u> concerned mostly with 19<sup>th</sup> century-style sovereignty; 'Hard Brexit'.
  - <u>Pragmatists</u> worried about protecting UK economy; **'Soft Brexit'**.
- The referendum was a political ploy by Conservative Party, not a grassroots movement.
  - PM Cameron called referendum in January 2013 to keep idealists & pragmatists united during last general election.
  - UK has not had such a referendum since 1970s.
- Referendum result provided no clear mandate on post-Brexit options.
  - We know what Brits voted against, but not what they voted for.
- Opposition party (Labour) is also divided over Brexit.
  - Leader (Corbyn is broadly anti free markets and thus broadly anti-EU), but many Labour voters like EU membership.



## UK political situation: Regional issues

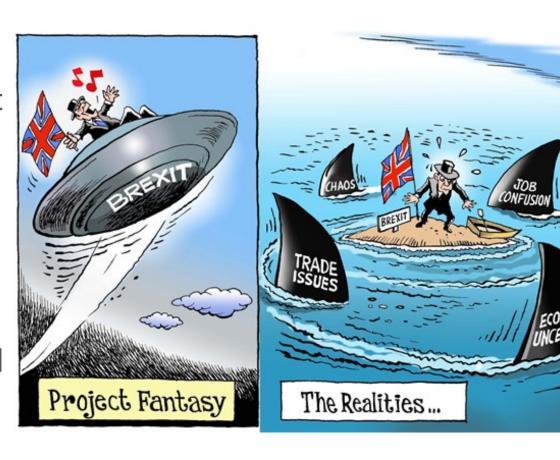
- Scots voted heavily to stay in EU.
- Scotland held referendum on leaving UK in 2014 (before Brexit)
  - Only 55% of Scots voted to stay part of UK.
  - Scotland might break away if 'Hard Brexit'
- Northern Ireland settled 'Irish unification' question by eliminating land borders with Republic of Ireland.
  - Brexit may reintroduce land border and thus spoil the political settlement.

## Scotland & Northern Ireland voted to stay in EU



## Current UK government's stance

- Current government is pretending that UK can have both 19<sup>th</sup> century-style sovereignty & protect economy.
  - PM May is trying to keep Idealists and Pragmatists together.
- Once talks start with EU27, the pretending will end;
  - Hard choices will have to be made.
  - Conservative Party will be split.
- General election in May 2020 could end up as a vote on Brexit options.
  - PM May might be ousted by own party in 2017 or 2018 if Brexit talks start to look like leading to WTO crashing out.



## Guess about likely outcomes

- Three scenarios with reasonably high probability of happening.
- 1. UK crashes out of EU without an new agreement with EU, and without a transitional arrangement.
  - Likely if UK takes a hard-line position on labour mobility.
  - Idealist win; Pragmatists lose.
- 2. Long negotiations but no disruption during transition.
  - Happens if UK accepts to Single Market conditions temporarily.
  - Idealist lose; Pragmatists win.
- 3. Long negotiations with disruptions during transition.
  - Happens if UK unilaterally imposes controls on EU workers;
  - Pragmatist win at first, but Idealists win later.



## Two possible scenario

#### Brexit talks start; EU27 insist that "Single Market means Single Market".

- UK government divides; pragmatist win.
  - Recent Nissan deal suggests this is not impossible.
- Talks are formally extended beyond two years, or a transitional arrangement agreed.
  - UK stays in Single Market

- UK government divides; idealists win.
- EU27 sticks to its position (since impossible to get 27 nations to agree changes).
- UK imposes migration controls unilaterally March 2019.
  - UK crashes out of EU without a transitional arrangement.

May 2020 General election becomes a vote on post-Brexit options.

## End

Thanks for listening

## Some key positions of EU27

Table 4 Positions on key issues

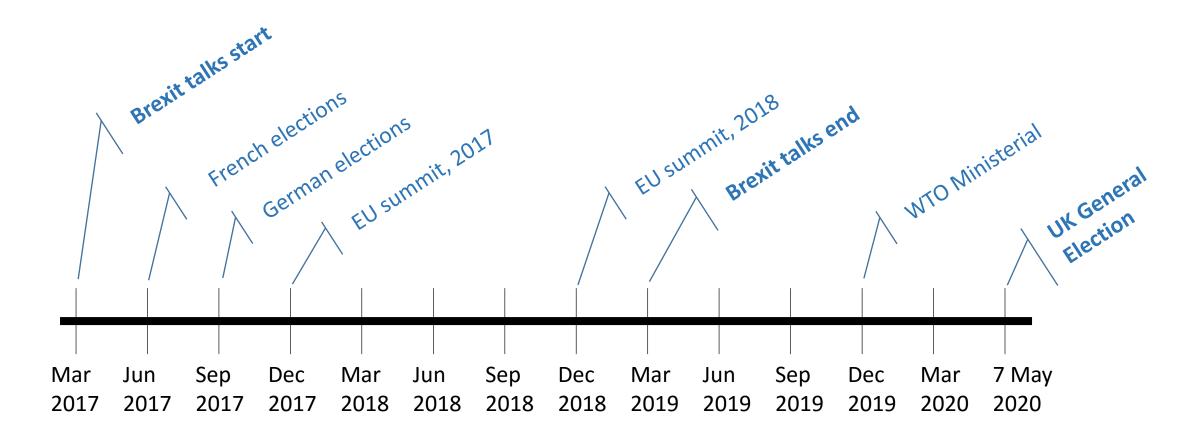
|             | Willingness to be flexible on: |                                  |                    |                             | G                                       |
|-------------|--------------------------------|----------------------------------|--------------------|-----------------------------|---|
|             | Trade                          | FDI and<br>financial<br>services | Labour<br>mobility | Kinship on<br>liberal views | Concern<br>about budget<br>contribution |
| Austria     | Yes                            | Yes                              | Some               |                             | Yes                                     |
| Belgium     | No                             | No                               | No                 |                             |   |
| Finland     | No                             | No                               | No                 | Yes                         |   |
| France      | No                             | No                               | Yes                |                             | Yes                                     |
| Germany     | No                             | No                               | No                 |                             |   |
| Greece      | Yes                            | Yes                              | Yes                |                             | Yes                                     |
| Hungary     | No                             | No                               | No                 |                             |   |
| Ireland     | No                             | Yes                              | No                 |                             |   |
| Italy       | No                             | Some                             | No                 | Some                        |   |
| Netherlands | No                             | Some                             | Yes                | Yes                         |   |
| Poland      | Yes                            | Yes                              | No                 | Yes                         | Yes                                     |
| Portugal    | No                             | Yes                              | No                 |                             | Yes                                     |
| Slovakia    | No                             | Yes                              | No                 | Yes                         | Yes                                     |
| Spain       | Yes                            | Yes                              | No                 |                             |   |
| Sweden      | No                             | No                               | Yes                | Yes                         |   |

- Taken from recent VoxEU eBook "What To Do With the UK? EU perspectives on Brexit", Edited by Charles Wyplosz
- Authors of 10 of 15 chapters think their nation would not be flexible on labour mobility.

Source: Author's own interpretation of contributions to this book

### Timeline

- UK is likely to trigger process in March 2017;
- "Divorce" part probably be completed; "Re-marriage" not.



## Estimated drop in UK exports

- Most of the estimates of 'pessimistic scenario' => double digit drop in UK exports.
- Drop with "Hard Brexit" (crash out of EU) is twice the impact of "Soft Brexit" (stay in Single Market).

