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ORIGINAL ARTICLE

Brexit and 'Global Britain': role adaptation and contestation in trade policy

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Abstract
Brexit has led to major changes in UK trade policy after decades of collective trade agreements and regulatory alignment with the European Union. Following the 2016 UK referendum on EU membership, the idea of 'Global Britain' was touted as the central goal in securing policy autonomy and regulatory independence with respect to trade, rooted in a strong sense of liberalization unencumbered by the perceived constraints of European membership. This article suggests that the UK's role conception as a global trading (and finance) state has been revived by Brexit. Yet the performance of this role has been mixed. Role adaptation is far from complete, and evidence from the postreferendum period suggests that the post-Brexit economy has failed to fulfil the optimistic expectations of the those who favoured Brexit. In trade, the UK has been buffeted by the post-Brexit relationship with the EU and the changing demands of the global political economy.

Keywords Brexit · Trade · Finance · Northern Ireland · Political economy

Introduction

In a high-profile speech in January 2017, then Prime Minister Theresa May (2017) indicated that the UK wanted to be 'a great, global trading nation that is respected around the world and strong, confident and united at home'. Three years later, May's successor Boris Johnson (2020) stressed that, in taking back control of its laws and

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destiny, the UK would 'be able to do our own free trade deals as one UK, whole and entire'. Both prime ministers advocated a vision of the UK in international politics, driven by a desire to deliver tangible benefits from the British withdrawal from the EU. Brexit, it was argued, would enhance the UK's status in the global arena, based on greater policy autonomy and regulatory sovereignty. Johnson's successors, Liz Truss and latterly Rishi Sunak, were committed to a similar position but have had to pursue it in an environment of geopolitical tensions, increased market volatility, energy crisis and supply chain vulnerability, all of which has meant greater attention to economic resilience and strategic engagement with like-minded partners in trade policy (HM Government 2023).

Brexit has, indeed, led to major changes in the scope and orientation of British trade policy, and UK role adaptation has meant a commercially driven foreign policy premised on economic openness and negotiated trade deals, coupled with a business strategy aimed at attracting investment in the technology sector. From this perspective, the UK's post-Brexit status has been underpinned by sovereignty practices unencumbered by European social protectionism and the masses of 'needless EU regulation', all of which had been viewed as damaging growth and incompatible with a neoliberal vision for Britain (Singham and Tylecote 2018). However, the difficulty is that the popular slogan 'taking back control' has required a learning (or relearning) of the dynamics of trade negotiations following the ending of decades' of British experience of European market integration and the delegation of trade competence to EU bodies. In negotiating complex trade arrangements with multiple partners, the UK has had to define and agree what role(s) it will pursue in different contexts, what sovereign powers are needed to further national goals, and what constraints arise when negotiating with other actors whose own interests may not align with those of the UK (Oppermann et al. 2020).

In embarking upon its own trade policy for the first time in over forty years, the UK has sought to increase its geopolitical influence beyond Europe. A readiness to take this course of action reflects the role orientation of the UK as a global power and an associated role conception as an internationally important trading and finance state. Status here, as in other issue areas covered in this special issue, is thus key to understanding Brexit. The emotional framing of the Brexit vote was not simply a matter of cold economic logic (as Prime Minister David Cameron hoped during the referendum) but embraced too an affective appeal to a vision of the UK as a significant 'unfettered' player in the global economy (Adler-Nissen et al. 2017; Siles-Brügge 2019).

In this sense, the initial post-Brexit narratives on trade policy were, as with much else about leaving the EU, framed by ideas of national identity. The economic rationale was secondary to more intuitive and appealing arguments about restoring the UK's past global role through, for instance, a prioritization of the Anglosphere as a potential trading bloc and a means to throw off the constraints of European economic integration (Melhuish 2022: 2; Saunders 2020). Brexit, by this view, would free the UK from the restraints of delegated sovereignty and so allow for an untrammelled trade policy, in which the legal and political requirements of collective European agreement would be replaced by independent, sovereign action. Such a position meant capitalizing on the UK's status as the preeminent financial hub in

Europe. This effort to protect the UK's privileged financial position (a long-standing objective of successive UK governments given the comparative advantages that the UK had enjoyed in the EU Single Market) reflected a consumption-based growth strategy. While an EU Member State, the UK had experienced a divergence from the other major European economies owing to its position outside of the Eurozone. But, pushed by successive global and regional financial crises as well as the integrationist logic of the Eurozone members, it had become clear that the UK could not remain insulated from Europe's economic dislocations (Rosamond 2019; Thompson 2017). Outside of the EU, the centrality of financial services to the British economy and the 'commercial dependence of EU corporates' on services from the City meant that there would need to be a distinct effort to address the risks associated with Brexit in this area (Kalaitzake 2021: 498). By contrast, no corresponding protections were envisaged for other business sectors including pharmaceuticals, automotive manufacturing, and professional and legal services (Egan 2020). The context of post-Brexit trade policy which affected these decisions was one of limited options. Despite the rhetoric, trade relations with the EU and states and regions beyond, was path dependent, tied to the UK's existing commitments as there were important principles and sunk costs that governed market activities. There was no *tabula rasa* for post-Brexit trade policy; it was shaped by internal domestic politics and by systemic constraints driven by the distribution of international economic power and the structure of international trade. Consequently, any consideration of post-Brexit trade policy must take on board the interplay between the domestic and international levels of analysis.

This article thus looks at the dynamics of role adaptation as a driver of British foreign policy, in which governments seek to 'maximize their own ability to satisfy domestic pressures, while minimizing the adverse consequences of foreign developments' (Putnam 1988: 434). Situating post-Brexit trade policy in this way allows us to appreciate the impact of often conflicting domestic considerations in shaping foreign policy choices, while also highlighting how different role conceptions in international trade deliberations can lead to different strategies and outcomes. The article's first section outlines European and British trade policy, and the initial trade effects of the UK's exit from the EU. The second section considers the different options open to the UK when negotiating trade relations with the EU. The article then focuses on the resulting political and institutional challenges to see how the UK has engaged in role adaptation in trade policy unencumbered by the constraints of EU membership. This is done across three issues (each with a dedicated section) which illustrate the challenges of role adaptation: the Northern Ireland Protocol, the fashioning of new trade agreements outside of Europe, and domestic institutional re-organization. The Conclusion offers some reflections on the UK's role adaptation against the backdrop of a changed global trade environment to explain why the British government has struggled to balance cross-cutting domestic and international pressures in developing its post-Brexit trade policy.

Trade policy

As the world's largest single and export-driven market, the EU has leveraged its market power to promote trade as a key foreign policy instrument of global influence. Trade policy is essentially concerned with managing the international exchange of goods and services between national or regional economies using a wide variety of policy instruments to facilitate growth and competitiveness (Velut 2015). For its Members States, trade is an exclusive competence of the EU. The 2007 Treaty of Lisbon addressed some of the constraints of constitutionally divided powers by transferring responsibility for trade negotiations from domestic governments to the European level (Garcia 2020). The European Commission manages trade negotiations while the Council sets out the mandate; the Council and Parliament must give their approval to any negotiated agreement. Member States are kept apprised of negotiations and approve any resulting agreements. As part of this process, the UK, when in the EU, aligned itself with more than fifty preferential trade agreements with a wide range of bilateral and multilateral partners.

Before the UK entered formal negotiations with the EU on the terms of exiting the Union, it was deemed possible that the UK could in some way continue to align itself with EU trade policy (De Ville and Siles Brügge 2019). However, this option soon disappeared from view as the UK sought to differentiate its trading relationship with Europe as part of a broader diplomatic strategy. As Brexit commenced, new trade agreements would, from the UK's perspective, became the standard medium to project international influence and leadership, even if the UK's post-Brexit role conception as a global trading (and finance) state was neither settled nor agreed—there being no consensus in country, parliament, or even government as to how trade policy would be conducted.

The international dimension of this strategy we consider below. Its corollary was a refashioning of trade with the EU. Many analysts calculated that post-Brexit there would be economic losses stemming from lower trade and foreign investment, leading to lower average UK incomes (Latorre et al 2019). The UK was, of course, highly reliant on trade with its EU partners, although even before Brexit that dependency had diminished. Between 1999 and 2007, the EU took between 50 and 55% of UK exports. This figure stood at 43.1% in 2016. It fell further to 41.7% in 2022 (Ward and Webb 2023, 4, 29). In its trade review of 2021, the Office for National Statistics (2022) noted the 'considerable volatility in trade statistics' owing to the '(COVID-19) pandemic, supply chain disruption, global recession and the […] surge in energy prices'. 'This volatility', it concluded, 'has made it more challenging to isolate EU exit-related effects'. With that caveat in mind, a Brexit effect was nonetheless discernible. UK trade with the EU fell noticeably with the commencement of pandemic-related lockdowns in the UK and across Europe in the spring of 2020, but 'fell sharply' again in the fourth quarter of 2020 and the first quarter of 2021 'following the end of the Brexit transition period and the additional disruptions this caused to UK-EU trade' (Ward 2021: 7). In January 2021, UK trade with the EU as a proportion of total UK trade was at its lowest level since data began to be collected in 1997 (Ward 2021: 7–8). COVID-19 and global conditions aside, it seems that Brexit had by itself resulted in a sharp drop in trade flows with the EU relative to the rest of the world owing to new border controls, decreased foreign direct investment inflows and reduced trade openness due to migration restrictions (Prime Minister's Office 2021). Trade flows have been hampered by the rise of non-tariff barriers with Europe including regulations and standards, as well as licensing and quotas (Du and Shepotylo 2023). Many British firms, meanwhile, simply stopped exporting to the EU owing to a sharp increase in costs resulting from new customs and export rules (Dhingra et al. 2022). New post-Brexit border checks on food imports from Europe were due to come into effect in 2024 further raising import prices and creating potential supply chain disruptions (Foster and Speed 2023).

Trade tensions have been heightened by the inconsistencies between the different roles Britain has adopted, as the UK's strained ties with the EU bloc have been in marked contrast to its constructive approach to trade elsewhere (Beattie 2022). As outlined below, the UK's trade role towards non-European members has been influenced by an internationalist, liberal market tradition along with a strong geostrategic foreign policy orientation. Its role towards the EU, by contrast, has been conditioned by a narrative that is not only conflictual and antagonistic but (under prime ministers Johnson and Truss) generated concerns from the USA that the UK had failed to grasp the importance of legal commitments in the Good Friday Agreement and the Northern Ireland Protocol.

Policy options: from Barnier's 'staircase' to the Trade and Cooperation Agreement

The future UK–EU economic relationship was hardly debated, let alone resolved, before the 2016 referendum. With no clear path ahead on what the future relationship with the EU might look like, the vote in favour of leave raised profound questions for UK policymakers. The political desire in the ruling Conservative Party to implement Brexit was intense. Hence, Prime Minister May (who, ironically, had backed remain) found herself in March 2017 invoking (on behalf of the British government) Article 50 of the Lisbon Treaty so triggering withdrawal negotiations. Some clear 'red lines' soon emerged including a post-Brexit independent trade policy that meant the British would either have to negotiate some form of free trade agreement (FTA) with the EU or opt for bilateral trade with EU on World Trade Organisation (WTO) 'most-favored-nation' (MFN) terms (May 2016; Singam and Treycote 2018). Nonetheless, it was assumed by those advocating Brexit that tangible benefits would accrue to the UK through the assertion of its position as a global trade leader. This would entail an ongoing effort to build autonomous institutional and policy structures to support an international rather than a European focus, all in pursuit of ambitious trade agreements in a 'post geographic trading world' (Fox 2016).

The UK could thus not countenance being part of the EU Single Market and Customs Union—as Theresa May explicitly stated in 2018—as this would mean a continuation of the *status quo*. Instead, the UK would pursue 'Global Britain', asserting a core economic identity that had been previously subsumed by EU membership (HM Government 2021). Global Britain would be open, inclusive, and outward facing in trade by prioritizing regulatory autonomy over market access. There was little regard here for the perceived negative economic consequences of withdrawal from the Single Market despite the prevalence of economic assessments and metrics of the ‘costs of non-Europe’ (Dhingra et al. 2017). Instead, there would be a ‘bonfire of regulations’ to remove regulatory obstacles to the corporate and financial sector as Britain adapted to the new economic environment (Dickson 2022). The expectation was that the UK would capitalize on its international role, centred around the belief that breaking away from EU rules would allow the UK to become more competitive by being able to set its own competition, technical and regulatory standards.

However, a lack of preparation to leave the trade bloc reflected domestic divisions with little consultation having occurred with the devolved regions of the UK or opposition parties. Heightened divisions were also evident in government. May’s inability to form a consensus inside her own cabinet and party signalled the difficult choices that lay ahead. Chancellor Philip Hammond argued for close economic alignment with the EU, while Brexit Secretary David Davis and Trade Secretary Liam Fox wanted to sever ties to maximize regulatory flexibility. Prime Minister May (cited in Dallison 2017), meanwhile, came out in December 2017 in favour of a ‘bespoke deal’ with the EU. Such a position was backed up with rhetoric on ‘red lines’ by which the British government wanted full control over immigration and law-making, the end of any role in its domestic affairs on the part of the European Court of Justice and no further British contributions to EU budgets (Hestermeyer and Ortino 2016). The EU side, for its part, opposed granting UK businesses any sort of favoured treatment and was against any arrangement that accorded the UK privileges over and above those enjoyed by other third countries (Oliver and Williams 2016).

As the UK had tried to push informal negotiations, it was no surprise that the EU insisted on a sequential negotiation, where the conditions and obligations of British exit were to be first settled in a Withdrawal Agreement (WA) before consideration was given to any future trade agreement. This meant that British policymakers were involved in simultaneous, distinct but interrelated bargaining processes at both international and domestic levels. Britain’s position was hampered by a lack of clear negotiating objectives and a hardline negotiating strategy. The suggestion from UK government that ‘no deal was better than a bad deal’ did nothing to build trust or facilitate a negotiated outcome with the EU (Martill 2021). The EU’s chief negotiator, Michel Barnier, laid out the possible options in a ‘staircase’ graphic to the European Council in December 2017, in which the trade-offs between rights and obligations went from full EU membership for the UK to a basic free trade agreement along similar lines to those with Canada and South Korea (Barnier 2017). Even then, different conceptions were in evidence, as Brexit Minister David Davis called for a ‘Canada Plus Plus Plus’ deal, implying the UK deserved better access than the Canadians.

Within the UK, there was considerable discussion about potential Brexit options. The government’s own analysis, published in November 2018, outlined four ‘analytical scenarios’. Three were rejected—‘a hypothetical free trade arrangement’, a model akin to the European Economic Area (EEA), and a ‘no-deal scenario’—on the grounds that these would either mean staying in the Single Market or ‘would not meet the Government’s commitment to ensure no hard border between Northern

Ireland and Ireland' (HM Government 2018a: 16). The favoured option was derived from the government's White Paper of July 2018 on the future relationship that foresaw 'frictionless' trade in goods between the UK and the EU along the lines of the Comprehensive Economic and Trade Agreement (CETA) with Canada (HM Government 2018b: 8, 85). The EU, for its part was unwilling to offer the British a sector-by sector approach, and viewed the 'four freedoms' of the Single Market (of goods, capital, services and people) as indivisible. There would thus be no 'cherry picking' by the UK. To allow it would have challenged prevailing EU legal norms and practices (European Council 2017: paragraph.1).

It was only with the publication of the UK draft text for a Free Trade Agreement (FTA) in May 2020 that the UK finally laid out its goals formally (HM Government 2020). In reference to trade, the draft was a departure from the earlier preferred model of the EU–Canada CETA. Rather than emulation, the British government sought more integration in some areas (notably financial services and professional qualifications), along with more favourable rules of origin, and mutual recognition of product standards and regulations that would enable UK goods to enter the EU without border checks. The government also requested equivalence for food and animal safety when dealing with the EU, favouring high standards in this area while rejecting prior commitments on the level playing field that covered state aid, social and employment standards, the environment, climate change, and relevant tax issues (Holmes et al. 2020). The UK government thus prioritized sovereignty over trade and, contra to the 2018 White Paper, seemed to accept that there would be trade 'friction' regarding goods. It also set up contestation over aspects of conditionality (on trade, fishing rights and the level playing field) it believed the EU was imposing on the UK relative to other FTAs.

With pressure to agree a trade deal before the Brexit transition period ended in December 2020, the tough stance taken by both sides meant the discussions continued right up to the deadline. So too did speculation on the consequences of a possible no-deal scenario. The eventual outcome—the Trade and Cooperation Agreement (TCA) signed between the EU and the UK in December 2020—was limited in scope. Its focus on removing tariffs on trade in goods, coupled with some additional provisions on transport, energy, police and judicial cooperation, along with the contentious issue of fisheries, meant that the UK had chosen to opt for a shallow trade agreement. In foregoing the inclusion of services along with recognition of professional qualifications, financial passporting, intellectual property, and sanitary and phytosanitary regulations, the UK rejected the sorts of provision included in other EU trade agreements in order to preserve its regulatory authority and independence. The TCA contained some substantive areas of agreement, but the British government's push for concessions was meant to address domestic concerns, signalling that the agreement would not be a continuation of the obligations of membership (Usherwood 2021: 119). However, the TCA did meet the domestic desire for greater autonomy in trade policy so that the UK could, as the British chief negotiator David Frost stressed, 'set rules for our own benefit' (Frost 2020).

Both Houses of Parliament passed in a single day the legislation necessary to implement the TCA into domestic law. The European Union [Future Relationship] Bill was passed on 20 December 2020. But this was only the beginning of an involved political and legislative process. The UK's new status as a non-EU member meant that it faced profound challenges of domestic adaptation, not least in relation to Northern Ireland (NI)**.**

Northern Ireland: reputation and dispute

The most intractable issue in the negotiations proved to be the need to maintain a 'frictionless border' between Northern Ireland (NI) and the Republic of Ireland (RoI) under the terms of the UK-RoI Good Friday Agreement of 1998. The solution initially agreed upon in late 2018 in negotiations over the WA was a 'backstop' whereby the whole of UK territory would potentially remain in a customs union with the EU in order to facilitate NI's alignment with the RoI in the Single Market. This arrangement was opposed by Unionists in NI and by a large section of the Conservative Party, which in turn, contributed to a parliamentary rejection of the WA on three occasions in 2019 (so precipitating May's resignation as Prime Minister in May 2019). Its replacement—the Northern Ireland Protocol—was agreed between the Johnson government and the EU in late 2019 as part of the revised (and final) WA. It removed the backstop element with a so-called 'frontstop', whereby 'Northern Ireland would follow EU rules and regulations on customs and goods while [the rest of the UK] would not' (McCall 2020).

The Protocol meant that goods crossing the border from NI into the RoI had to meet EU standards to enter the Single Market and were also subject to European rules on state aid and sales tax in order to maintain a level playing field. This, in effect, divided the UK in two. NI had a distinct and separate status from mainland UK and ended up in the unusual position of being part of two separate custom arrangements—one within the UK and one within the EU. The effect was to compromise the regulatory jurisdiction of the UK in its own territory. Such an unusual state of affairs complicated potential trade agreements between the UK and non-EU countries.

It should nonetheless be noted that the position of NI was agreed with the UK government. Whatever its later misgivings, London had signed up to an international agreement it was required to implement. Yet, the Protocol was always an expedient, a means by which the Johnson government could tidy away an issue in order to 'get Brexit done' (in Boris Johnson's words). The status of the Protocol proved controversial from the outset. The United Kingdom Internal Market Bill contained provisions to override the NI Protocol and, in the words, of the Northern Ireland Secretary, Brandon Lewis (cited in Parker et al. 2020) to 'break international law in a specific and limited way'. These provisions were subsequently removed but not before considerable damage had been done to the UK's international reputation (Hogarth 2020).

The application of the Protocol continued to cause controversy after the UK formally left the EU. In June and July 2022, the European Commission launched two separate rounds of infringement procedures, charging that the UK had failed to implement the Protocol and had proven 'unwilling[…] to engage in meaningful discussion' (European Commission 2022). The UK government, for its part, argued that the Protocol had been 'a huge compromise' and that the EU lacked flexibility in its application (Johnson cited in HM Government 2021: 3). The Northern Ireland Protocol Bill was passed by the House of Commons in July 2022. The government conceded the Bill's provisions could mean the 'non-performance of [the UK's] international obligations' but argued that the legal doctrine of necessity allowed for such action and that the European Commission had proven intransigent in negotiating amendments to the Protocol (Foreign, Commonwealth and Development Office 2022). The UK view was widely contested (Cormacain 2022). Thus, even former Prime Minister May voted against the Bill arguing it was not 'legal in international law' and would 'diminish the standing of the United Kingdom in the eyes of the world' (UK Parliament—Hansard 2022).

The head of the Confederation of British Industry, Tony Danker (cited in Partington 2022) noted that the EU side was being 'inflexible' but that UK 'unilateral action' had led global firms 'shorting' their investments in the British economy. While NI firms were adapting to the new customs and regulatory border as they become familiar with its requirements, the British government's position seemed uncompromising driven by a desire to protect its status as an autonomous actor by exercising discretion in the application of an agreement already signed with the EU. An emphasis on appeasing domestic Brexit supporters thus undermined Britain's status internationally as its actions were viewed as not only confrontational but also violating international treaty commitments (Freedland 2022). A further change of government did nothing to alter the British position. Liz Truss had defended the UK stance on the Northern Ireland Protocol while Foreign Secretary. During her brief tenure as Prime Minister (September–October 2022), she continued to do so, even in the face of suggestions from the Biden White House that her government's attitude on the matter was not conducive to a UK–US trade deal (Borger 2022).

The Northern Ireland issue had taken on the status of a 'wicked problem' with no obvious solution. Wherever blame lay, the UK's change of policy (from supporting the Protocol to challenging it) severely strained relations between London and European capitals and between London and Washington. It also generated concern among Northern Irish businesses (and public opinion in the province) that wanted to make the Protocol work. Under Johnson and Truss, British actions undermined patterns of expected appropriate behaviour by ignoring prior trade commitments and violating international legal norms. To rectify the situation, Rishi Sunak as Prime Minister, reached an agreement with the EU in February 2023 on the Windsor Framework. This amended the Northern Ireland Protocol with special arrangements that separated trade from the UK mainland to NI from that with an onward destination to the RoI or the EU. The Windsor Framework did not fully settle the NI issue, but it signalled a new political mood in UK–EU relations, was backed by the UK's main opposition parties (even if NI's Unionists were sceptical) and staunched internal dissension within the Conservative Party. Sunak's flexibility thus marked a seeming reorientation of the government towards Europe designed to take the sting out of the NI issue (Usherwood 2023). It also had ancillary benefits, improving the atmosphere between EU and UK officials in talks on unresolved issues such as cooperation in financial services (Fleming and Pickard 2023).

Despite the difficulties in implementing the Protocol, the north–south economic relationship in the island of Ireland has thrived. Exports from NI into the RoI grew rapidly, estimated at almost 3.35 billion pounds in 2021, reflecting an increase of 65 per cent compared to 2020 (Euractiv 2022). Goods traded across the Irish border incurred no new checks and controls due to NI remaining part of the Single Market. It was a different story in trade between the UK mainland and the RoI. According to the Irish Central Statistics Office, overall exports from mainland Britain to the RoI fell 13% in 2021 to 12.9 billion pounds as RoI firms found new suppliers in Europe and adjusted their supply chains (Barns-Graham 2022). It is too soon to tell how far the Windsor Framework will ameliorate this situation.

Signing trade agreements: role adaptation and role emulation

According to Liam Fox, following Brexit, trade would be central to achieving the UK's global ambitions, free from the heavy-handed and inflexible policies imposed by the EU (Koutrakos 2020). As already noted, as an EU Member State, the UK had been legally constrained in pursuing these ambitions because trade fell within the exclusive competence of the Union—including matters related to the Customs Union, the Single Market (i.e. competition rules), fisheries and the common commercial (or trade) policy.

Even before its formal withdrawal from the EU, the UK had initiated trade negotiations with third countries. Much was made here of the ability to conduct independent trade deals with the fastest growing export markets in the world (Lazowski 2020). The UK was initially oriented towards the Anglosphere where it would, according to Johnson (cited in Borger 2017), be 'first in line' for a trade deal with the USA. This, it was claimed, would provide an important Brexit 'dividend' given the size of the potential market. UK–US negotiations commenced in May 2020, but as a House of Commons report (Webb 2022: 2) pithily noted over two years later in August 2022, an agreement was 'not expected soon', with negotiations having been suspended in October 2020. Concerns held by President Joseph Biden and the US Congress on the UK's attitude to the Northern Ireland Protocol were widely reported as one reason for American reluctance to push for an agreement (Webb 2022: 8). Even though tensions over NI had been eased with the new UK–EU trading arrangements in the Windsor Framework, this had done little to facilitate progress on a deal with the US. Indeed, the UK seemed increasingly resigned to not achieving one, pursuing instead lower-tier trade talks with a handful of American states and conceding that a large volume of trade was already being transacted in the absence of a free trade agreement (Pickard and Williams 2023).

Overall, post-Brexit trade policy has sought to avoid the imposition of trade tariffs and barriers with countries that have FTAs with the EU. Keen to avoid putting British importers and exporters at a competitive disadvantage relative to European companies, Koutrakos notes (2020: 76), 'a lot of time and energy has been spent seeking to ensure continuity of the EU's trade agreements'. Some of the trade agreements under negotiation have aligned with those of the EU in terms of scope and content. Rollover agreements with Canada and Mexico, for instance, simply replicated the terms the UK once enjoyed by virtue of EU trade agreements with these two states. The UK has faced tough choices about its priorities, given that many existing European agreements governed different aspects of trade, as well as numerous sectoral agreements on issues such as energy, aviation, and data that were critical for the functioning of commerce. In seeking to rollover and emulate EU agreements, London could not simply dictate its wishes as many states saw trade talks as an opportunity to renegotiate terms given that the British market was smaller than that of the EU (Lazowski 2020). Negotiations with countries such as Canada and Japan, therefore, faced a common issue: why should these parties offer to the UK terms any more favourable than those that had already been concluded with the EU (Egan 2020). What emerged was an assortment of negotiations on the part of the UK: with countries with which the EU had free trade agreements; with third countries with which the volume of trade was marginal; and with substate entities as a substitute for higher-level agreement (as of mid-2022, twenty US states had agreed to trade memoranda with the UK) (Lazowski 2020).

While the UK has been active in the trade realm, some post-Brexit agreements (both agreed and under negotiation) could be ascribed to mimetic responses to the European trade agenda so preserving existing preferential trade agreements. Such role emulation reflects the contextual demands stemming from negotiations as well as behavioural role expectations, as the UK has attempted to change its trade role within the international system (Beasley et al. 2021). This has been the case in relation to the World Trade Organisation (WTO) Agreements, where the UK found that efforts to apportion tariff rate quotas on agricultural products in conjunction with the EU generated significant opposition from third countries (Koutrakas 2020; Messenger 2020). The UK had framed its decision to side with the EU as a way of minimizing trade disruption with third countries although these same states continued to call for an expansion of market access commitments to avoid any reduction in trade with the UK. This highlighted the significant challenges in developing an accepted post-Brexit international stance, as the UK faced simultaneous, interrelated demands at both the international and domestic level in terms of negotiations involving market access commitments (Strong 2018: 3).

By mid-2023, the UK had negotiated thirty-four 'rollover' or 'continuity' trade agreements. In parallel, the UK had expanded its trade priorities towards the Indo-Pacific, signing trade agreements with Australia (UKAFTA) in December 2021, New Zealand (UKNZA) in February 2022, and a digital agreement with Singapore that same month. The government's emphasis on pushing for accelerated trade agreements has led to criticism that the 'historic' Australian deal provides few economic benefits and only marginal effects on GDP (Dent 2023). Farmers' associations, meanwhile, complained that UKAFTA and UKNZA would have a detrimental impact on the British agricultural sector. When examined by the House of Commons International Trade Committee (2022, 7), UKAFTA was, however, seen as significant as a dress-rehearsal for UK negotiations on entry to the 11-nation Comprehensive and Progressive Agreement for Trans-Pacific Partnership (CPTPP). Opened in September 2021, these talks concluded two years later with a deal on UK membership. That agreement reflected the strategic priority of the region for British trade policy in which the government continued to pursue what Sunak labelled 'post-Brexit freedoms'. Not surprisingly, it was talked up by ministers as a 'post-Brexit win' (Bond 2023). Close analysis, however, suggested that 'the estimated gains for Britain overall' would be 'very small' as the UK already had free trade agreements with nine of CPTPP's eleven members (Edwards and Douch 2023).

Talks on a trade agreement with India opened in January 2022, and with the six countries of the Gulf Cooperation Council in June, coupled with revisions to the continuation agreements with Mexico and Canada. While none of these deals offset the trade losses incurred by Brexit, the belief persisted in government that a post-Brexit trade policy reorientation was necessary (Office for Budget Responsibility 2022). Dent (2023: 24) concludes that 'the UK's new FTAs […] nevertheless [meant] adopting US trade regulation and rules established by important, recently implemented and heavily US-influenced agreements'. Such role emulation without an FTA with the US suggested that post-Brexit trade policy might have been less about trade volumes than strategic regulatory alignment and values.

Domestic institutional reorganization and contestation

Brexit placed UK institutions under stress and created conflict over trade responsibilities among different government departments. The Foreign and Commonwealth Office was reluctant to cede its trade portfolio, while the Treasury during the Brexit negotiations pushed for continued UK participation in the Single Market. The new Department for International Trade (DIT) and the Department for Exiting the EU (DExEU) both sought to enlarge their portfolios. The UK also delegated new responsibilities to existing departments such as the Department for Environment, Food, and Rural Affairs (DEFRA) which took on subsidies payments to farmers as the UK left the EU's Common Agricultural Policy.

Agriculture, in fact, highlighted the internal constraints of the post-Brexit environment, as each of the four constituent parts of the UK pursued different legislative initiatives regarding a new agricultural policy framework. But these domestic differences remained subject to the external framing of the post-Brexit UK–EU relationship. Even though food is a big export industry for the UK, more than a third of the country's food supply is imported from EU Member States. Further, farming organizations after the Brexit referendum raised concerns that the British agricultural sector would be swamped by cheap food from new trade deals and that the UK government was not sufficiently committed to supporting British exports (Harvey 2021). DEFRA sought to assuage these concerns with the postponed lifting of many import controls from the EU (including sanitary and phytosanitary checks). But that, in turn, raised concerns over the cost and the reliability of supplies. The more general point was the difficulty of the UK's adaptation to its post-Brexit circumstances—extracting the UK from an EU where more than a quarter of European rules cover food and agricultural exports. Additional difficulties arose in trade negotiations with other parties. Agricultural standards became important aspects of the UK's trade talks with the CPTPP and the US, and emerged as complex, controversial and time-consuming to settle (Agriculture and Horticulture Development Board 2021). These issues, in turn, often led to cross-departmental tensions. Pressure to conclude trade deals was strongly felt in the DIT and it proved to be more accommodating on agricultural standards than DEFRA would have preferred, leading to subsequent criticisms that the rush to complete trade deals by then Prime Minister Johnson and Trade Secretary Truss undermined the government's own environmental goals (Alim 2023).

Issues of organizational restructuring also arose. As we have seen, the Brexit referendum led to the creation of two new departments—DExEU and the DTI. The latter had some organizational precedent, but the former was created completely 'from scratch' (Healy 2016). The goal was to divide up responsibilities so that DExEU would focus on planning exit negotiations with the EU and securing a future UK–EU relationship, while DIT would develop and coordinate UK trade policy, including preparing new free trade deals and dealing with trade promotion, foreign investment, and market access issues. Both sought to expand their resources through recruitment from existing departments. While DExEU drew on staff from the Foreign Office Directorate and the UK's Permanent Representation to the EU, DIT was formed from the merger of UK Trade and Investment, the Trade Policy Directorate within the former Department for Business, Innovation and Skills, and UK Export Finance. Yet DExEU had difficulty adapting to its role. It was responsible for overseeing negotiations with the EU and so became a lightning rod for the various domestic and intra-governmental controversies that Brexit occasioned. Policy disagreements resulted in the resignation of two secretaries of state before the conclusion of talks with the EU. Former minister David Lidington (2020) remarked that it was a mistake to create a separate department to deal with Brexit. Instead, it should have been 'an annex to the Cabinet Office and Number 10'. DExEU was soon considered superfluous and was dissolved in the aftermath of the signing of the TCA agreement in December 2020. By contrast, DIT was faced with building up its expertise and capabilities. It launched recruitment drives to attract trade negotiators from outside of government. DIT was able to navigate cuts to public spending, as it developed the UK's new trade policy and gained more experience in negotiating trade deals. Other regulatory agencies, meanwhile, faced shortfalls in recruiting skilled staff to implement post-Brexit regulatory equivalence regimes and requisite border checks (Economist 2022; Foster 2022).

The far-reaching consequences of Brexit enabled Theresa May and then Boris Johnson to reconstruct the machinery of government by separating out different trade related functions and implementing major changes in administrative function. However, performance was mixed across departments, so prompting a seeming return to more traditional foreign policy machinery as the FCO absorbed development policies to link aid and foreign policy—hence the transition to the Foreign, Commonwealth and Development Office (FCDO) in September 2020. The FCDO thus expanded its portfolio after initially being sidelined during the UK–EU negotiations when some FCDO officials were moved to other Whitehall departments in the aftermath of the referendum. Further, both the FCDO and Cabinet Office Brexit Unit absorbed DExEU functions with the latter being shifted to the department for Business, Energy, and Industrial Strategy (BEIS). In 2023, Sunak's government reorganized the trade and business portfolio by separating energy and business into two separate departments, and creating a business and trade ministry, where the business portfolio of BEIS was merged with DIT under Kemi Badenoch, the Secretary of State for Business, Energy and Industrial Strategy (Parker and Pickard 2023). This reorganization brought business, trade, and investment together in one portfolio, shifting the previous focus on industrial policy in BEIS towards one centred on export promotion and trade deals.

Conclusion

British trade policy post-Brexit has entailed role adaptation at a time when the rules-based international order has come under challenge, not just from illiberal trade practices undermining global rules and norms, but also from the populist turn in national politics (Jones 2021). Such populism had led to a marked shift towards economic nationalism and protectionist policies eroding support for globalization even in the United States, which had been long-standing supporter of openness. In this setting, the UK has eagerly promoted a trade policy that has sought to maximize economic competitiveness and secure international leadership. This position was initially reflected in the post-Brexit discourse on Global Britain and the operation of trade policy connected to a role conception of the UK as an international trade and finance state. This position entailed global economic engagement and the seeking of trade arrangements to compensate for the loss of preferential access to the EU, the UK's largest market.

However, the UK's trade policies have been constrained by the regulatory agenda at the centre of trade negotiations, the effort to roll over existing EU trade agreements with third countries, and the need to accept a certain set of rights and commitments as a party to existing multilateral WTO agreements. For the foreseeable future, the TCA will structure trade relations between the UK and the EU. So far, the need to respond to multiple competitive pressures through the loss of export markets has heavily taxed the British economy. Despite the continued poor performance of the British economy and the escalation of its dispute with the EU over specific provisions of the TCA as well as the Northern Ireland Protocol, the UK has remained set on its global market ambitions. In so doing, the UK has sought to preserve its long-standing identity as a global economic power, pushing trade liberalization on the assumption that new opportunities would eventually offset and ultimately outweigh the loss of EU membership.

Brexit was premised on the freedom to be able to regulate independently to advance British trade and financial interests, but economic constraints have limited the UK's options. Ridding the British economy of unnecessary European rules has generated much debate but not much substance. There has not been the degree of regulatory divergence that Brexit supporters had expected. The UK has increased its expertise and investment in building regulatory capacity in key sectors as it is now outside the European regulatory and legal framework. Though the pandemic delayed some of the consequences of the Brexit deal, adaptation to a new role has nonetheless been difficult with repeated postponement of deadlines for border controls and custom formalities coupled with firms having to adjust to new costs and delays when trading with the EU. This has been amplified by disagreements on the enforcement of the Northern Ireland Protocol which has led to increased tension between the EU and UK over the trade provisions that extend the Single Market to NI to protect the cross-border provisions in the Good Friday Agreement. The gap between the UK and the EU over the terms and implementation of the Northern Ireland Protocol has often been the consequence of UK efforts to defend British national sovereign identity and to give succour to Northern Irish unionism. This then led to threats to unilaterally alter the terms of the agreement through domestic legislation causing new sets of challenges. Under Prime Minister Sunak, the UK changed tack and the negotiation of the Windsor Framework marked a serious, if incomplete, attempt to resolve the UK–Ireland–EU conundrum.

In a post-Brexit environment, the UK has aspired to act as a global power able to maximize autonomy and leverage to negotiate trade deals, while also operating under the constraints of a global economy and the legal commitments associated with EU withdrawal. Brexit is less about a new role orientation (this remains rooted in the idea of the UK as a leading global actor and, by extension, long-held assumptions about market liberalization and trade openness), and more about role adaption in which UK strategies and instruments have had to adjust to changing power relations in global trade governance. Conceptions of its post-Brexit role have stretched the UK's trade capabilities. Post-Brexit foreign policy has entailed the British government promoting its 'market' ideals, responding to international and domestic pressures, and reshaping the structures of government.

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