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The UK–EU SPS agreement: a deep dive for Northern Ireland

What the UK–EU food and farming deal of 20 November 2026 changes for Northern Ireland and Great Britain, who gains and who loses, and the official numbers on what NI farms and food firms make, emit, buy and sell.

IN NUMBERS

1 Mar 2028
date the SPS deal is aimed to apply; not yet law

49%
of NI processed food sales went to GB in 2022 (£3.16bn)

26%
went to Ireland and the rest of the EU (£1.71bn)

£886m
of inputs NI processors bought from GB; £969m from the EU

⅔
of NI farm emissions come from cattle, beef and dairy (2024)

2.0%
of NI GVA from farming (2024), against 0.6% for the UK; processing adds 2.2%

Read online: **robertjpark.co.uk/go/sps/**

The short version

On 20 November 2026 the United Kingdom (UK) and European Union (EU) concluded a Sanitary and Phytosanitary (SPS) Agreement: Great Britain will follow EU food, animal and plant rules as they change, in return for dropping most certificates and border checks. It is aimed to apply from 1 March 2028 and is not yet law.

For Northern Ireland, five things matter:

1. **Great Britain (GB) to Northern Ireland (NI) gets easier.** Most food, plants and farm machinery moving from GB to NI will need no export health, phytosanitary or animal health certificates and no routine checks. The NI Retail Movement Scheme and the NI Plant Health Label Scheme fall away for most goods.
2. **Little changes on NI farms.** NI already follows EU SPS rules under the Windsor Framework. The rule changes land on GB farms, not NI ones.
3. **NI's edge narrows.** NI is currently the only part of the UK with frictionless agri-food access to the EU. GB producers lose most SPS checks into the EU from 2028 and compete more directly with NI processors, though, unlike NI, they still face customs.
4. **GB takes EU rules without a vote.** The UK gets an early role in shaping EU rules, but not a vote on them. Brexit-era GB-only choices on pesticides, novel foods and gene editing are wound back, with transition periods.
5. **It stands or falls with the rest.** The SPS deal, the carbon market link and the youth scheme are to enter into force together.

General information, not legal advice. Status as at 21 November 2026; the treaty text is not published.

Terms used. CBAM: carbon border adjustment mechanism, a charge on the carbon in imported goods. CFP: Common Fisheries Policy. CHED-P: common health entry document for products. CJEU or EU Court: Court of Justice of the European Union. CO2e: carbon dioxide equivalent; kt is kilotonnes. CPTPP: Comprehensive and Progressive Agreement

for Trans-Pacific Partnership. DAERA: Department of Agriculture, Environment and Rural Affairs (NI). DBT: Department for Business and Trade. Defra: Department for Environment, Food and Rural Affairs. DESNZ: Department for Energy Security and Net Zero. ECHA: European Chemicals Agency. EEA: European Economic Area. EEC: European Economic Community. EFRA: the Commons Environment, Food and Rural Affairs Committee. EFSA: European Food Safety Authority. EHC: export health certificate. EPRS: European Parliamentary Research Service. ETS: emissions trading system. EU: European Union. FSA: Food Standards Agency. GB: Great Britain. GDP: gross domestic product. GHG: greenhouse gas. GTAP: Global Trade Analysis Project. GVA: gross value added. IUU: illegal, unreported and unregulated (fishing). NAEI: National Atmospheric Emissions Inventory. NI: Northern Ireland. NIRMS: Northern Ireland Retail Movement Scheme. QMV: qualified majority voting. SHA: support health attestation. SPS: sanitary and phytosanitary, meaning food safety, animal health and plant health. TAC: Trade and Agriculture Commission. TCA: the UK–EU Trade and Cooperation Agreement. TRACES: the EU's Trade Control and Expert System. WTO: World Trade Organization.

What was agreed, and its status

Negotiations concluded on 20 November 2026; both sides "aim to apply this agreement from 1 March 2028" (Joint Statement, paragraph 48). Nothing has changed in law yet.

Step	Status at 21 November 2026	Source
Negotiations concluded	Done, 20 November 2026	Joint Statement, para 48
Treaty text published	Not yet	Joint Statement; SPS explainer
UK legislation	A European Partnership Bill plus secondary legislation, not yet introduced	SPS explainer
Entry into force	Jointly with the carbon market link and the Youth Experience Scheme, "subject to each party's legal procedures"	Joint Statement, para 50
Application date	1 March 2028, with targeted transitions	Joint Statement, para 48; SPS explainer
Detailed business guidance	"Throughout 2027"	Defra Farming blog, 20 November 2026

Until 1 March 2028, Defra's advice is to "continue to follow current UK requirements". Earlier government guidance (summer 2026, read from a search extract) spoke of "mid-2027", which would mean a slip of about eight months.

How it works

GB joins a "Common SPS Area" and applies the same EU rules at the same time, as they change ("dynamic alignment"). In return, most certificates and routine checks on GB–EU agri-food trade go.

What it covers (SPS explainer):

- animal health, breeding and antimicrobial resistance in animals;
- plant health and plant reproductive material (seeds);
- food and feed safety, and animal welfare;
- fishery products;
- nutrition rules, food labelling, organics, marketing and compositional standards;
- pesticides and biocides.

What it leaves out: wine and spirits; the Common Fisheries Policy and fisheries management; tariffs, customs and trade policy. It applies to Great Britain and the Crown Dependencies. Northern Ireland stays under the Windsor Framework.

UK exceptions:

- the ban on exporting livestock and horses for fattening or slaughter stays;
- the UK sets its own stricter rules on pet smuggling, reviewed after five years;
- gene-edited (precision bred) plants: England's regime runs until July 2028, when the EU's new framework starts, with marketing allowed until October 2029.

Transitions: pesticides 9 to 21 months for final use; three named actives (cinmethylin, pydiflumetofen, isoflucypram) pending an EU decision; GB-only novel foods (cell-cultivated, precision fermentation, cannabidiol) to October 2029; biocides up to 42 months; organic poultry and eggs 12 months; goods already on the GB market can still be sold there.

Governance. The 20 November papers do not set this out. The May 2025 Common Understanding said the deal would have an independent arbitration panel "that ensures the Court of Justice of the European Union is the ultimate authority for all questions of European Union law", a UK financial contribution to EU costs, "decision-shaping" for the UK, and the right to take targeted action on biosecurity (Common Understanding, paras 28–32). The explainer confirms an "early role in shaping EU rules" and access to European Food Safety Authority (EFSA), the Community Plant Variety Office and parts of European Chemicals Agency (ECHA). **Not yet published:** the size of the payment, the exit terms, and the final dispute clause.

What changes for Northern Ireland

The deal changes NI mainly by changing GB: once GB follows the same rules NI already follows, most of the controls on GB-to-NI agri-food movements lose their reason to exist.

	Now (Windsor Framework)	From 1 March 2028 (if implemented)
Rules on NI farms and processors	EU SPS rules, since 2021	Unchanged: still EU rules
GB retail food to NI shops	NI Retail Movement Scheme; "Not for EU" labels; identity checks cut from 10% to 8% in December 2025 (search extract)	NIRMS "no longer required for most goods"; kept only for goods under GB transitions
GB plants, seeds, used machinery to NI	Phytosanitary certificates; NI Plant Health Label Scheme	No certificates or routine checks for most; Plant Health Label Scheme no longer required
GB meat, dairy, fish to NI businesses	Export health certificates and checks at NI ports	No certificates or routine checks for most
Where GB stays out of line (wine marketing, illegal fishing rules)	Windsor Framework flexibilities	Those flexibilities extended
NI goods to GB	Unfettered access	Unchanged
NI goods to the EU	Free, as part of the EU SPS area	Unchanged, but GB now competes on the same terms

Sources: SPS explainer, Northern Ireland section; Government response to the Independent Review of the Windsor Framework (identity checks); NI Assembly Windsor Framework timeline (labels).

Before 2028, enforcement tightens, not loosens. On 10 November 2026 the UK and EU agreed "to strengthen efforts in the implementation of the sanitary and phytosanitary (SPS) measures, with a view to ensuring that all agri-foods are moved to Northern Ireland in accordance with the Windsor Framework rules" (Withdrawal Agreement Joint Committee statement). Traders should expect closer checks for the next 15 months, not fewer.

Stormont's view. Department of Agriculture, Environment and Rural Affairs (DAERA) Minister Andrew Muir called the deal "a massive step in the right direction" that "will not fix everything", and named NI's dual market access as its competitive advantage (DAERA, 20 November 2026).

Not yet known: what happens to the border control posts built at NI ports and their staff; which goods stay under Northern Ireland Retail Movement Scheme (NIRMS) during the transitions; and how parcels to NI consumers will be handled.

What changes for Great Britain

From 1 March 2028 most food and feed sold in GB must meet EU rules, "even for businesses that don't currently trade with the EU" (FSA, 20 November 2026). The Food Standards Agency (FSA) alone has about 80 of the roughly 500 pieces of legislation affected (FSA growth goals).

Exports to the EU

- No export health certificates (up to £200 each) or phytosanitary certificates (about £25 each, plus at least £127.60 a load in inspection fees).
- No routine border checks for most goods; checks stay on live animals and germinal products.
- Markets reopen for fresh sausages, burgers, seed potatoes and molluscs.
- Organic goods no longer need certificates of inspection.

Imports from the EU

- Routine checks by port health authorities on EU dairy, fish, eggs and red meat stop (Information for businesses).
- Import checks on EU plants stop, but some post-import checks and a notification system for high-risk plants remain (horticulture guidance).
- EU plant passports replace UK ones.

Imports from the rest of the world get tougher. Inspections of some non-EU imports rise to EU levels, "including some goods that are not currently subject to routine inspection" (food production guidance). GB becomes part of the EU's outer border for food.

The starting point. The SPS explainer says UK agri-food exports to the EU have fallen 32.5% since 2019. Defra's April 2026 blog gave 22% since 2018, about £4 billion. The two figures use different base years and are not reconciled in either source.

By type of business

Business	In Northern Ireland	In Great Britain
Livestock farmers	Little change: already on EU rules. More GB beef, lamb and dairy competing in EU markets	Changes to animal ID, holding registration, movements, disease control; vet medicine rules change. Live export ban stays
Arable and horticulture	Cheaper GB seed, plants and used machinery: no certificates or plant health labels	Pesticides and treated-seed rules change: 9–21 months to use up products; EU plant passports
Food processors	Easier GB inputs. Lose the edge of being the only UK region with frictionless EU access	All products must meet EU rules from 1 March 2028; may need to change "ingredients, recipes or labels"
Retailers	NIRMS and "Not for EU" labels largely go; one supply chain from GB depots	Simpler sourcing from the EU
Hauliers	Fewer documents and checks at Belfast, Larne and Warrenpoint for most loads	No export health certificates or routine checks on EU routes
Vets	Less export certification on GB-to-NI flows	Less certification work; checks stay on live animals and germinal products
Seed and plant nurseries	Easier GB supply	EU market reopens, including seed potatoes
Fishing and seafood	Fish trade under SPS rules eases; fisheries management untouched	Molluscs reopen; illegal-fishing (IUU) rules still apply; CFP not included
Novel food and gene-editing firms	NI already on EU rules	GB-only authorisations end: cell-cultivated, precision fermentation and CBD foods to October 2029; precision-bred plants: England's framework ends July 2028, marketing allowed to October 2029

Sources: SPS explainer; Defra Farming blog; FSA; fish and shellfish guidance. The NI column is my reading of the Windsor Framework interplay, not a government statement.

Trade deals and third countries

The deal does not change tariffs or the UK's trade agreements, but it fixes GB's food standards to the EU's, which narrows what the UK can offer other partners on agriculture.

- **Comprehensive and Progressive Agreement for Trans-Pacific Partnership (CPTPP).** The Trade and Agriculture Commission advised in 2023 that CPTPP's SPS chapter does not limit a member's rights under the World Trade Organization (WTO) SPS Agreement (Article 7.4.2), so CPTPP does not stop the UK setting its own standards (TAC advice). The objection, raised in the Lords on 4 September 2025, is that CPTPP works by recognising equivalence, not by aligning with one bloc's rules (Hansard; I could not open the full debate). No CPTPP member has formally challenged the deal that I have found.
- **United States.** The Commons Business and Trade Committee found that prioritising the EU SPS deal "creates limited room for further agri-food deals with the United States (US)" (The UK-US economic relationship).
- **Hormone beef and chlorine-washed chicken.** Already banned under current GB law. The deal locks those bans in; a future government could lift them only by breaking alignment.
- **Australia, New Zealand, Canada.** Their deals with the UK cut tariffs but do not oblige the UK to accept their standards. Exporters already meet EU-style rules to sell into GB.
- **Pesticide residues and new approvals.** GB follows EU decisions on maximum residue levels, so imports treated with products the EU does not approve may be blocked. Assam tea has 12 extra months under GB limits, which shows

where friction may come.

Contested. Groups such as Competere argue dynamic alignment will "provoke retaliation" from the US, Canada, Australia and others, citing their WTO challenges to the EU regime (written evidence). That is a submission to a committee, not a finding; I have found no government assessment of third-country reactions.

Costs and benefits

The government's headline is up to £5.1 billion a year by 2040, or up to 0.14% of gross domestic product (GDP), about 10 to 15 years after the deal starts. That figure is a model result, not a full cost-benefit analysis.

	What the government's model says	Source
Method	GTAP trade model (Purdue University), 2017 base year; compares with and without the deal, not the path between	DBT methodology note
Key assumption	Agri-food trade costs fall 5.9 percentage points on EU imports into the UK and 3.0 points on UK exports to the EU (trade-weighted)	Same; drawn from an unpublished Andersons Centre study for Defra
Result	Up to +0.14% GDP; up to £5.1bn against projected 2040 GDP, or £3.6bn against 2023 GDP	Same
Where most of the gain comes from	Cheaper imports from the EU; an exports-only gain would be "significantly lower"	Same
Per-shipment savings	Up to £200 per export health certificate; about £25 per phytosanitary certificate plus at least £127.60 a load	SPS explainer

What the figures leave out: short-term adjustment costs (the note says so); the cost to GB firms of changing products, labels and pesticides; the UK financial contribution, not yet published; the cost of tougher checks on non-EU imports; and any effect on trade with third countries. The note does not quantify any of these.

No Northern Ireland figure. I have found no published estimate of the gain or loss for NI. The NI benefit is mainly lower costs on GB-to-NI supply, which retailers and DAERA expect to ease shelf availability; no saving has been costed.

What is bad for Northern Ireland, and the case for and against

For NI the deal mostly removes a cost it never chose, the Irish Sea checks on GB food, but it also gives away NI's one agri-food advantage.

What is bad for NI

- **The edge goes.** NI is the only part of the UK with frictionless access to the EU for food. From 2028 GB processors lose most SPS checks too, though they still face customs, and compete for the same customers in Ireland and the EU.
- **More competition at home and abroad.** GB beef, lamb and dairy can move into EU markets more cheaply, against NI's biggest exporters.
- **No new say.** NI has followed EU SPS rules since 2021 with only a limited say: the Stormont Brake, applicability motions and the periodic consent vote. The deal extends rule-taking to GB, without even those, rather than giving NI more voice.
- **Tighter checks first.** The Joint Committee's 10 November 2026 statement points to stricter enforcement of current rules until 2028.
- **The tail runs long.** NIRMS stays for goods under GB transitions: novel foods to October 2029, biocides up to 42 months (about September 2031).
- **Linked fate.** The SPS deal enters into force only with the carbon market link and the youth scheme. A problem in either delays the GB-to-NI gains.

What is good for NI: one set of food rules across the UK again; cheaper GB supply for shops, farms and nurseries; fewer certificates and checks at NI ports; and an end to "Not for EU" labels on most products.

The case for (the government's)

- Faster, cheaper trade with the UK's biggest food market, worth up to £5.1 billion a year by 2040.
- An end to most of the Irish Sea checks, without moving NI out of the EU's SPS area.
- Shared biosecurity: access to EFSA and EU early-warning systems.

The case against (critics')

- "Dynamic alignment": GB takes future EU rules it cannot vote on, with the EU Court as final word on EU law in disputes. In the Commons on 8 May 2025 an opposition Member of Parliament (MP) called the talks a "surrender summit" (Hansard).
- Less room for trade deals with the US and others on agriculture.
- GB-only innovations, such as gene-edited crops and novel foods, are wound back.
- The £5.1 billion figure rests on an unpublished study and leaves out the costs.

Is GB now a rule-taker? In SPS and carbon trading, yes: it applies EU rules with an early say but no vote. It keeps its own tariffs, trade deals, fisheries management and most other law. The deal is not a customs union or single market membership. Whether that amounts to a loss of sovereignty or a sensible trade-off, as Switzerland makes (Norway goes further, through the European Economic Area), is the political argument.

NI's SPS industries: then, now and next

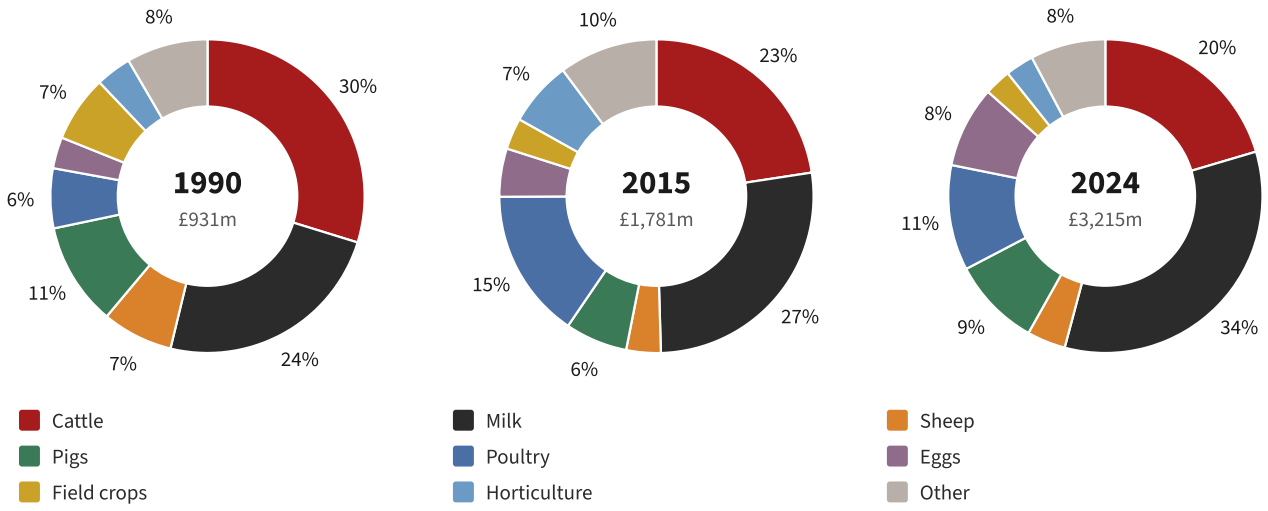
NI's food chain has more than tripled in cash terms since 1990, mostly through inflation, and shifted towards milk, poultry and eggs, while beef stays its biggest emitter by far.

These are the industries the SPS deal governs: farming, and the processing of meat, milk, eggs, fish, fruit and vegetables, bakery goods and drinks. Years are 1990, 2015 (the last full year before the referendum) and the latest official figures: 2024 for farming and emissions, 2022 for processing. Farm output figures now run to 2025 (provisional, DAERA, 19 August 2026), but emissions stop at 2024, so I use 2024 for farming, with DAERA's August 2026 revisions; processing figures stop at 2022.

Farming

Milk has overtaken cattle as the biggest earner on NI farms

Share of NI gross agricultural output; centre = total, current prices; 2024 as revised August 2026



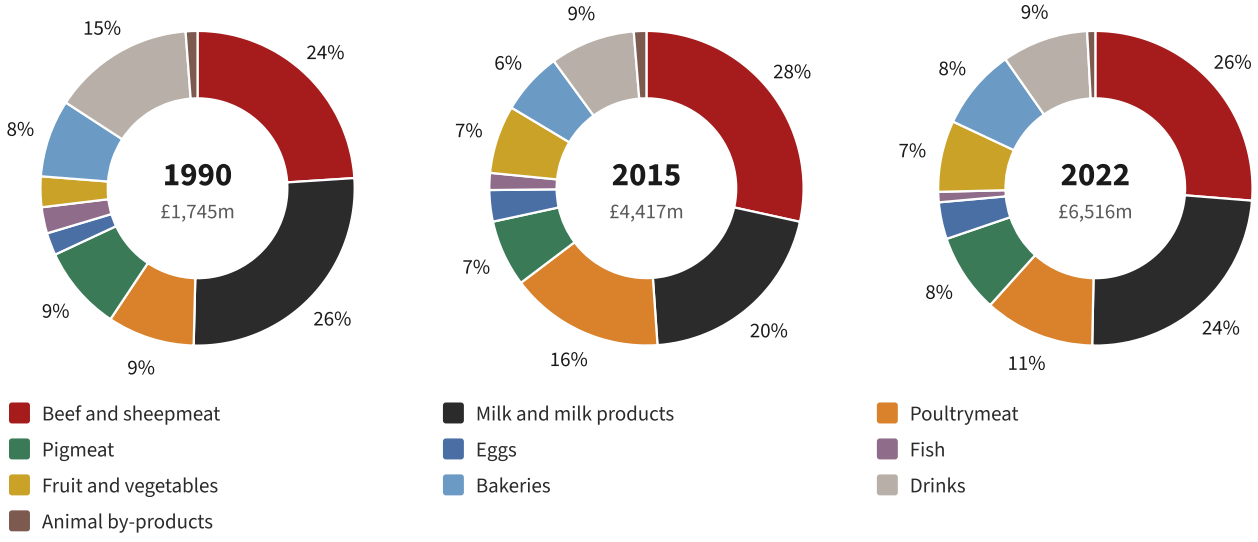
Source: DAERA, Aggregate Agricultural Account (Table 2.1), January 2026; 2024 revised in the 2025 account, August 2026.

Milk's share of farm output rose from 24% to 34%, and poultry and eggs from 9% to 19%. Cattle fell from 30% to 20%, sheep from 7% to 4%. In 2025 cattle output rose 37% on higher prices (provisional).

Food and drink processing

Beef and dairy are half of NI food processing, as in 1990

Share of NI food and drink processing turnover; centre = total, current prices



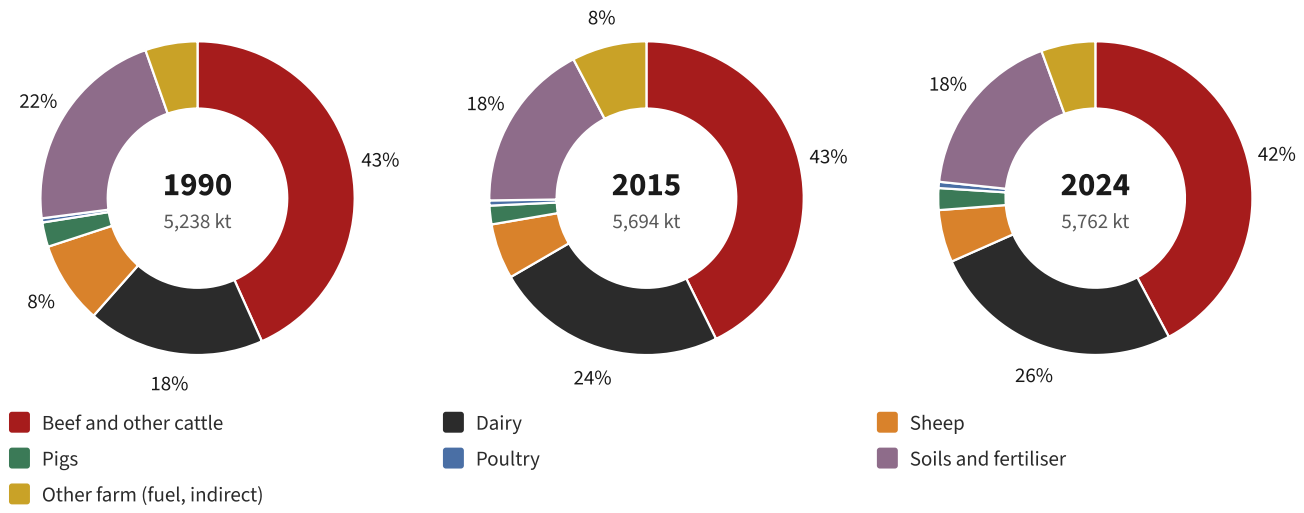
Source: DAERA, NI Food and Drinks Processing Report 2022, time series (April 2025). Firms over £250,000 turnover.

In real terms (2015 prices) processing turnover grew from £3.0 billion in 1990 to £4.4 billion in 2015 and £5.4 billion in 2022. Poultry's share peaked before the referendum; drinks fell from 15% to 9%; fruit and vegetables and bakeries grew.

Carbon emissions and carbon intensity

Cattle make two thirds of NI farm emissions; dairy is the part still growing

Share of NI agricultural greenhouse gas emissions by source; centre = total, kt CO2e



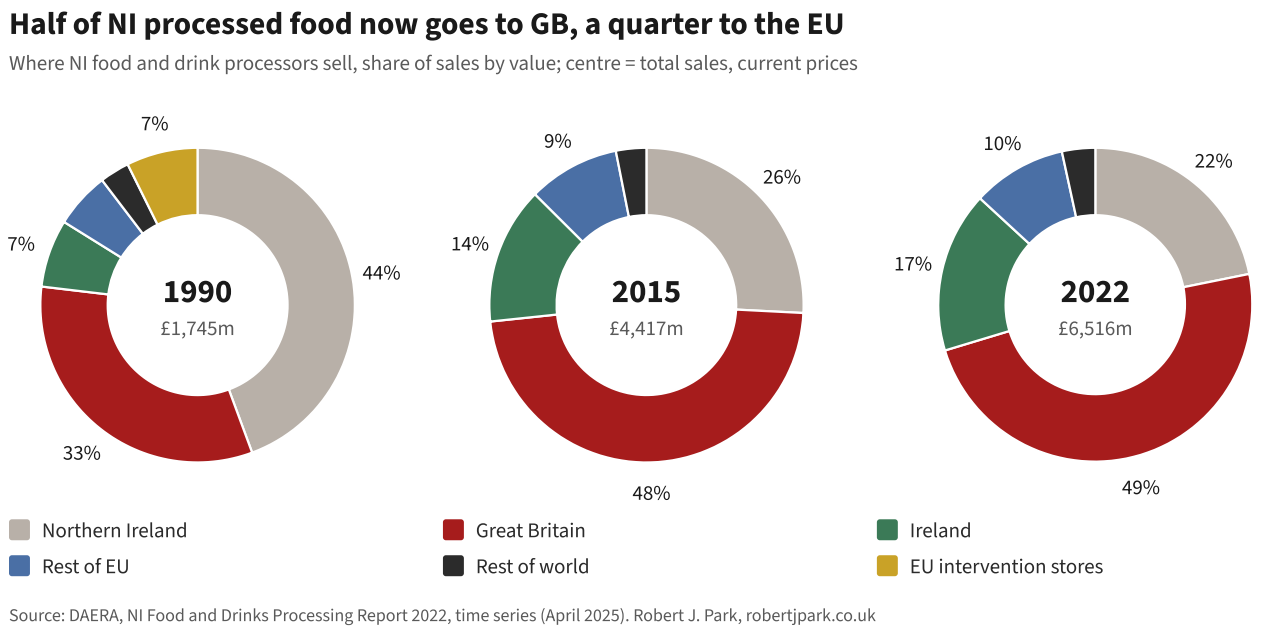
Source: NAEI, devolved administration GHG inventories 1990–2024 (June 2026). Livestock = enteric plus manure.

Farm emissions rose 10% between 1990 and 2024 while output more than tripled in cash terms, mostly through inflation. Emissions by industry:

Industry	Direct emissions 1990 (kt CO2e)	2015	2024	kg CO2e per £ of farm output, 2024
Beef and other cattle	2,267	2,432	2,435	3.71 (2.71 on 2025 prices)
Sheep	444	326	312	2.45
Dairy	955	1,361	1,505	1.39 (1.25 on 2025 prices; DAERA: 1,927 g per kg of milk in 1990, 1,155 g in 2022, not re-checked)
Pigs	132	109	129	0.44
Poultry, meat and eggs	22	30	37	0.06
Food and drink processing (fuel use)	575	181	140 (2022)	0.02 per £ of turnover, 2022, current prices (0.03 in 2015 prices; 0.19 in 1990). Direct fuel use only, excluding electricity

How to read this. These are NI territorial emissions from the animals and their manure. Soils and fertiliser (1,023 kt in 2024) and farm fuel are shared across all farming and not split by industry. "Beef and other cattle" includes dairy replacement heifers, and DAERA's cattle output includes dairy culls and calves, so the split between beef and dairy is approximate and leans against beef. Pigs and poultry look low mainly because they are not ruminants and produce little methane; their imported feed is also counted where it is grown, not in NI. On a full life-cycle basis they would be higher; I have found no official NI figure. Intensity per £ is in current prices (DAERA's revised 2024 output, August 2026) and moves with farm-gate prices: on 2025 prices beef falls to about 2.7 because cattle prices rose, not because emissions fell. Compare industries within a year, not one year against another. Milk's per-kilogram fall comes from DAERA's carbon intensity indicators (9 December 2025).

Where NI food goes, and where its inputs come from



Source: DAERA, NI Food and Drinks Processing Report 2022, time series (April 2025). Robert J. Park, robertjpark.co.uk

In 1990 NI processors sold 44% of their output at home and a third to GB. By 2022 GB took 48.5% (£3.16 billion), Ireland 16.5% (£1.08 billion) and the rest of the EU 9.7% (£631 million): about £1.71 billion, or 26%, went to the EU.

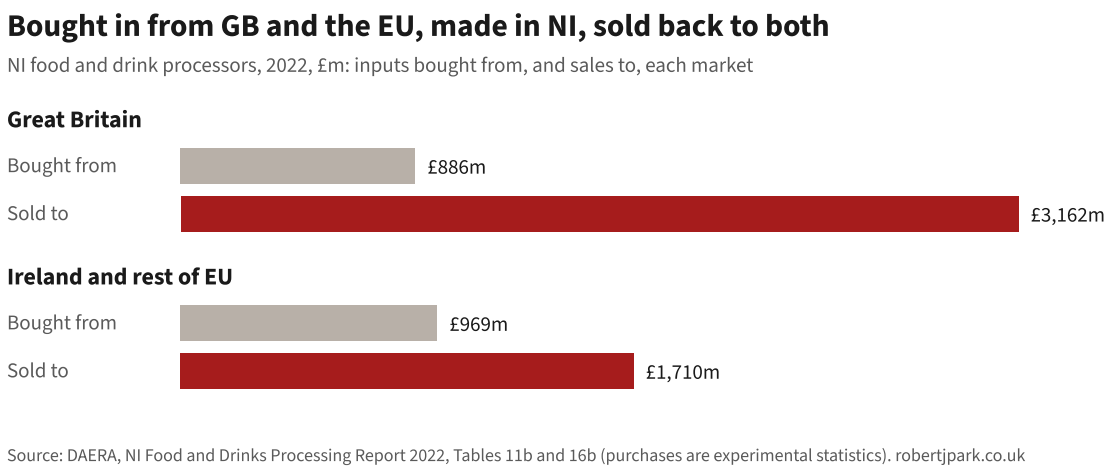
What were "EU intervention stores"?

Under the old Common Agricultural Policy, when market prices fell below a set floor, each member state's intervention agency had to buy beef, butter, skimmed milk powder and cereals at a guaranteed price. The produce went into cold store until prices recovered, then was sold off, often for export, for processing or through free food schemes. In the UK the buyer was the Intervention Board for Agricultural Produce, with the Department of Agriculture for Northern Ireland, and from August 1990 the Livestock Marketing Commission for Northern Ireland, supervising work here as its agents (Hansard, 6 June 1991).

Northern Ireland in 1990. NI processors sold £128 million to intervention that year. That was 7% of their sales, more than they sold to Ireland (£122 million) or to the rest of the EU (£100 million). Beef was the main product. In March 1990 a Northern Ireland minister told the Commons that the government had "sought to optimise beef intervention in Northern Ireland" to lift prices for winter-finished cattle (Hansard, 16 March 1990). DAERA's series does not split the £128 million by product. Some of the stock came back as free food: the UK gave about 3,000 tonnes of intervention beef to people in need in 1990 (Hansard, 3 April 1996), and 50 organisations handed out beef and butter in NI (Hansard, 22 October 1990).

Who else held it. Every member state had an intervention agency, run nationally and funded by the Community (the EU did not exist until 1993). Commission regulations in 1990 put up for sale beef held by the UK, Irish, German, French and Spanish agencies (Regulation (EEC) No 1166/90; No 2722/90). By June 1991 the Community held about 760,000 tonnes of beef, 235,000 tonnes of it in Ireland (Dáil Éireann, 4 July 1991). In February 1985 beef stocks were 606,000 tonnes across the ten member states: France 188,000, Italy 153,000, Ireland 85,000, Germany 79,000 and the UK 50,000 (Hansard, 26 April 1985). Intervention mattered on both sides of the border: 7% of NI processors' sales in 1990, and almost a third of Community beef stocks held in Ireland in 1991.

Why it is zero now. The 1992 MacSharry reforms and later changes cut support prices and limited what could be sold into intervention. Public intervention survives in EU law as a safety net, mainly for butter and skimmed milk powder; the EU bought large amounts of milk powder this way in 2016–17. By 2015 DAERA records no NI processing sales to it.



Inputs: what NI processors buy, and from where (2022)

Origin	Purchases	Share
Northern Ireland	£3,247m	63%
Great Britain	£886m	17%
Ireland	£782m	15%
Rest of EU	£187m	4%
Rest of world	£40m	1%

Bought in, made here, sold on: the subsectors where it shows (2022, £m)

Subsector	Bought from GB	Bought from Ireland and rest of EU	Sold to GB	Sold to Ireland and rest of EU
Beef and sheepmeat	426	128	1,114	292
Bakeries	91	63	149	125
Pigmeat	82	13 (rest of EU only; Ireland suppressed)	suppressed	56
Fruit and vegetables	30	62	223	92
Drinks	51	19 (rest of EU only; Ireland suppressed)	59	238 (Ireland only)
Milk and milk products	suppressed	40 (rest of EU only)	475	328 (Ireland only)

Source: DAERA, NI Food and Drinks Processing Report 2022, Tables 11b and 16b (experimental statistics on purchases). "Suppressed" means DAERA withheld the figure to protect individual firms. Purchases include raw materials such as livestock and milk as well as packaging and other goods.

Why this matters for the SPS deal. NI processing works across both markets: it buys £886 million a year from GB and £969 million from the EU, and sells £3.2 billion to GB and £1.7 billion to the EU. Today the GB inputs that are animals, meat, plants or seeds cross the Irish Sea under EU SPS controls, which is what lets the finished product go on into the EU. From 2028 most of those controls fall away, so GB inputs get cheaper for NI processors; live animals from GB are still checked, so beef and lamb gain less than the headline suggests. The same change removes most SPS checks on GB processors selling into the EU, though, unlike NI firms, they still face customs declarations and rules-of-origin paperwork.

Share of the economy

	2015/16	Latest
Agriculture, % of NI GVA (UK)	1.2% (2016, provisional)	2.0% (2024, provisional; UK 0.6%)
Food and drink processing, % of NI GVA (UK)	not found for 2015	2.2% (2022; UK 1.5%)
Food and drink processing, % of NI manufacturing GVA	not found for 2015	19.3% (2022, not re-checked)

Farming is about 2.0% of NI's economy, against 0.6% across the UK; food and drink processing adds 2.2%, against 1.5% (DAERA Statistical Review 2024, November 2025). Together that is about twice the UK share. A comparable 1990 share is not published in the current regional accounts, which start in 1998. Sources: DAERA Statistical Review of NI Agriculture 2016 and 2024; NI Food and Drinks Processing Report 2022.

Projection: where the trend points

If each subsector keeps its 2015 to 2022 real growth rate, NI food processing would reach about £6.9–7.2 billion by 2030 and £8.0–8.7 billion by 2035, in 2015 prices, against £5.4 billion in 2022. The lower figure grows the total at its own 3.0% a year; the higher compounds each subsector separately, as in the table.

Subsector	2015	2022	Real growth a year, 2015–22	2030 trend	2035 trend
Beef and sheepmeat	1,255	1,429	1.9%	1,656	1,817
Milk and milk products	903	1,310	5.4%	2,002	2,610
Poultrymeat	701	618	−1.8%	535	489
Pigmeat	302	441	5.6%	680	891
Eggs	143	206	5.4%	315	410
Fruit and vegetables	309	398	3.7%	532	638
Bakeries	283	455	7.0%	780	1,094
Drinks	386	482	3.2%	621	727
Fish	77	58	−3.9%	42	35
Animal by-products	57	45	−3.1%	35	30
Total	**4,417**	**5,442**	**3.0%**	**7,198**	**8,741**

£ million, 2015 prices, deflated with the GDP deflator DAERA uses. My arithmetic.

This is a trend, not a forecast. It assumes the next decade looks like 2015 to 2022. Four things argue against that. 2022 was a price spike for milk, so dairy's trend is overstated. The GDP deflator lagged food prices in 2022, which overstates real growth in every subsector. From 2028 GB processors lose most SPS checks into the EU, which bears hardest on beef and dairy, the largest sellers to Ireland and the EU (pigmeat's Ireland figure is withheld). And if farm emissions are to fall in line with NI's carbon budgets, cattle numbers are the main lever, which would cap beef and dairy throughput. I have not modelled emissions forward; DAERA publishes its own greenhouse gas projections.

Rule-taker or vassal state?

On the test Jacob Rees-Mogg set out in January 2018, the SPS deal and the carbon link meet all three conditions in their two policy areas: EU Court authority over EU law, new EU rules taken without a vote, and payments to the EU.

Where the phrase comes from. It entered the Brexit argument in late 2017 over the transition period. In the Lords in January 2018 it was said that Lord Kerr "was the first to coin the phrase, which has now been echoed by Jacob Rees-Mogg" (Hansard, 30 January 2018). Rees-Mogg set out his test to David Davis on 24 January 2018: if the UK "is subject to the European Court of Justice, takes new rules relating to the single market and is paying into the European budget, are we not a vassal state?" (Exiting the EU Committee, oral evidence). Davis replied: "I do not accept your description of vassal state."

The three tests applied (SPS and ETS only):

Rees-Mogg's test	SPS deal	Carbon market link
Subject to the EU Court	The Court is "the ultimate authority for all questions of European Union law" inside an arbitration system (May 2025 Common Understanding)	Same principle agreed in May 2025; the November explainer mentions only an "independent arbitration panel"
Takes new EU rules	Yes: dynamic alignment, early role in shaping, no vote	Yes: GB aligns to EU monitoring, verification and benchmark rules from 2028
Pays the EU	A financial contribution to EU costs; amount not published	A "financial contribution framework"; no figure

What the tests do not cover. The 2018 test was about the whole single market. Here the rule-taking is limited to two sectors; the UK keeps its own tariffs, trade deals, fisheries management, tax and most other law, and the carbon link can be ended by notice.

My position. In these two areas GB is a rule-taker, and NI has been one across most goods rules since 2021, though its Assembly has a limited brake that GB will not have. On Rees-Mogg's three tests, all are arguably met within these two sectors, though the Court's role is by referral from an arbitration panel and the payment is towards agency costs, not the EU budget. Whether that makes GB a "vassal state" is a political judgement. The counter-argument, that this is a limited and reversible sectoral trade-off like Switzerland's, is set out in the case for and against above.

Who writes the rules GB will follow

The UK will be consulted while EU rules are drafted, but the decisions are taken in rooms it is not in.

How an EU food or carbon rule is made:

1. **The Commission drafts.** This is where the UK's "early decision-shaping role on EU rules in development" applies (SPS explainer): UK experts can comment on drafts.
2. **Major laws** are adopted by the European Parliament and the Council of the EU (ministers of the 27). The UK has no seat or vote in either.
3. **Most technical SPS detail** (residue limits, approvals of pesticides and additives, disease controls) comes in Commission implementing acts voted on by committees of member-state experts. The UK does not vote there either.
4. **Votes in the Council and those committees are usually by qualified majority**: at least 55% of member states (15 of 27) representing 65% of the EU population.

What "decision-shaping" means in practice. It is consultation, not co-decision. The UK can argue its case early; it cannot block, amend or vote. That is the same model the EEA states (Norway, Iceland, Liechtenstein) have.

My view: consultation, not a vote. UK input is likely to carry least weight where it cuts against large member states' farm interests. Under qualified majority voting no single state can block alone; a blocking minority needs at least four states holding over 35% of the EU's population.

One check the UK keeps. New EU acts are added to the agreements by the UK–EU Joint Committee, "by mutual consent" (DESNZ ETS explainer). The UK could refuse to add a rule. Refusal could lead to suspension or, under the EU's proposed mandate, "cross-retaliation" across agreements including the Trade and Cooperation Agreement (TCA); the SPS text itself is not yet published. In practice the UK's choice is to take the rule or put the deal at risk.

Points 2 to 4 describe the EU's standard procedures and are not drawn from the summit papers.

Dynamic alignment versus mutual recognition

The EU would remove border checks only if GB copies its rules, not if GB proves its own rules are as good; that is why the deal is alignment, not recognition.

	Mutual recognition (equivalence)	Dynamic alignment
What it means	Each side accepts the other's rules as achieving the same outcome	GB applies the EU's rules, and changes them when the EU does
EU example	New Zealand veterinary agreement	Switzerland
Border checks	Reduced, not removed	Mostly removed
Who decides	Each side keeps its own law	The EU writes the law; the UK is consulted

The Lords Library summarises it: the New Zealand model "reduces some checks, while the Swiss model is based on closer regulatory alignment and removes most border controls".

Why the EU refuses mutual recognition

- **Its stated position.** Maroš Šefčovič told the BBC in January 2025 that an SPS deal would require the UK to keep its rules aligned and "to upgrade them at the same time" (Commons Library CBP-10312). In 2018 Michel Barnier rejected mutual recognition outside the single market's "common discipline" (Commons Library CBP-8384).
- **Size and closeness.** Evidence to Parliament noted the New Zealand model "is considered unsuitable given the proximity of the UK and volume of trade flows" (UK in a Changing Europe).
- **Enforcement.** Without the same rules and the Court above them, the EU has fewer ways to police what it accepts.
- **The Irish border.** NI sits inside the EU's SPS area. If GB goods were accepted as "equivalent" while following different rules, the EU would see GB-to-NI flows as a route into its market. Alignment closes that route; recognition would not.

Are GB standards higher than the EU's? In some places, yes; overall, it is mixed.

- **Higher in GB:** the ban on live exports for slaughter and fattening, and tougher pet-smuggling rules. Both are kept as exceptions to alignment, which shows the EU accepted that GB went further.
- **More permissive in GB:** gene-edited plants and some novel foods (cell-cultivated, precision fermentation, CBD), all being wound back.
- **Pesticides:** different lists both ways; I have found no official like-for-like comparison.

Under the May 2025 terms, an exception can be agreed only if "it does not lead to lower standards" (Common Understanding, para 28). So GB can keep a higher standard only by negotiating it as an exception, and any new GB standard above the EU's would need EU agreement or fall under the UK's right to "targeted action" on biosecurity.

So why did the UK accept alignment? The government's case: only alignment removes most checks, and only alignment ends most GB-to-NI checks without moving NI out of the EU's SPS area. The cost is that GB gives up setting its own food rules, including higher ones, except by agreement.

The EU Court of Justice: already on paper

The Court's role is not an assumption: the UK signed up to it in principle in May 2025, though the 20 November explainers leave it out.

- **SPS:** "The SPS Agreement should be subject to a dispute resolution mechanism with an independent arbitration panel that ensures the Court of Justice of the European Union is the ultimate authority for all questions of European Union law" (Common Understanding, para 29, May 2025).
- **Carbon link:** the same wording (Common Understanding, para 43).
- **The EU's mandate** goes further: "uniform interpretation", a tribunal "with a role for the Court of Justice of the European Union as the ultimate authority for all questions of Union law", and "the possibility of cross-retaliation between the new agreements" and the TCA (COM(2025) 804; read from an extract only).
- **The UK's framing:** disputes go to independent arbitration, and "any role for the Court of Justice would be limited to the interpretation of EU law for an arbitration panel" (as reported in the Lords, Hansard, 26 February 2026).

- **20 November papers:** the ETS explainer says only that "disputes are decided by an independent arbitration panel" (DESNZ); the SPS explainer does not mention disputes.

What it means. The panel decides, but on any question of what EU law means it must follow the Court. Since almost every SPS or ETS dispute turns on EU law, the Court will in practice decide the substance. The summit papers do not mention it; the treaty text should be checked when published.

The carbon market link, and the right to leave

From 2028 GB runs its carbon market on EU rules, and leaving the link takes 18 to 30 months' notice, three to five times the six months Switzerland has.

What GB follows from 2028 (DESNZ explainer):

- EU monitoring, reporting, accreditation and verification rules, dynamically;
- EU benchmark values for free allocation, with transitional rules for 2028 to 2030;
- a UK Market Stability Reserve tied to the EU's (6.7% of the EU reserve's intake and release);
- removal of the UK Auction Reserve Price, the UK's price floor;
- new EU acts added through a Joint Committee "by mutual consent".

What it means for GB. One carbon price in practice, set by a market the EU regulates. GB industry gets EU benchmarks and a higher price and, once the EU makes the planned exemption law, UK goods would no longer pay the EU carbon border adjustment mechanism (CBAM).

What it means for NI. The link covers GB and NI, except that NI's electricity generators and energy-from-waste plants stay in the EU ETS under the Windsor Framework. NI industry is in the UK ETS. The split stays; the price gap between the two closes. Detail is in the carbon deal paper.

The exit clause

- Either side can end the link by written notice; the notice period "will be between 18 and 30 months depending on when notice is given".
- Either side can suspend recognition of allowances or the CBAM exemption, if "temporary, necessary and proportionate to the gravity of the breach".
- If the TCA is terminated, the link ends too, on the same notice.

Compared with Switzerland: the EU–Swiss link "may be terminated at any time subject to a six-month notice period" (Swiss Federal Office for the Environment).

Why would the EU agree an exit clause? The EU's only other link, with Switzerland, has one; a link between two markets cannot be permanent law for a third country. But this one works in the EU's favour:

1. **It is long.** 18 to 30 months keeps a future UK government in the system for most of a Parliament after it decides to leave.
2. **The timing is set by the clock, not the UK.** "Depending on when notice is given" suggests exit is tied to trading periods, so the date of departure is not the UK's to choose.
3. **It is tied to the TCA.** Leaving the TCA ends the link; and the EU's mandate allows "cross-retaliation" across agreements. Leaving the link could be met with action elsewhere.
4. **It protects the EU market.** A long notice stops a sudden UK exit flooding or draining the shared market.

Not yet known: exactly how the 18 to 30 months is calculated, and whether the SPS agreement has its own exit clause. Neither is in the published papers.

CBAM and the Windsor Framework: still outside

Nothing in the 20 November papers brings the EU CBAM into the Windsor Framework; the deal makes the question matter less rather than answering it.

Where things stand

- **The UK position:** "The EU CBAM does not apply in Northern Ireland" (written answer HL12132, 3 December 2025).
- **How it could change:** applying the EU CBAM to NI would need a decision of the UK–EU Joint Committee under Article 13(4) of the Windsor Framework (Commons Library CBP-9935, April 2026), and, on the UK side, an Assembly applicability motion with cross-community support (Schedule 6B, Northern Ireland Act 1998).
- **Has the EU asked?** In April 2024 a minister said the EU had not approached the UK about adding CBAM to the Framework (NI Assembly, Brexit and Beyond, 29 April 2024). I have found nothing since.
- **The UK CBAM** applies UK-wide, NI included, from 1 January 2027 (Finance Act 2026, Part 5; status as at 21 November 2026).

What the deal changes

- The UK intends to exempt EU-origin goods from the UK CBAM from 1 January 2027, and the EU expects to exempt UK-origin goods from 1 January 2028 (DESNZ explainer).
- If and when both exemptions are made law, UK goods, from NI or GB, are outside the EU CBAM anyway, so NI's special position stops mattering for UK-made goods.

What it leaves open

- **Third-country goods.** The European Parliament's research service warned in 2023 that without CBAM in NI, goods could "cross into the EU single market via Northern Ireland, without paying the CBAM tariff" (EPRS). From 2027 they pay the UK CBAM on entry to NI instead. Whether the EU accepts that as enough is not addressed.
- **2027.** NI firms buying CBAM goods across the border are UK CBAM importers until the EU-origin exemption is in law.
- **Steel.** The Joint Statement (para 72) promises "a long-term sustainable solution for movement of UK originating steel to Northern Ireland", not yet agreed.

Answer to the question. CBAM is still outside the Windsor Framework. The deal manages the CBAM problem through mutual exemptions by origin, not by moving CBAM inside the Framework. That avoids an applicability-motion fight in the Assembly, but leaves NI inside the UK CBAM and outside the EU CBAM, with the third-country route unresolved.

Room for trade deals: CPTPP, the US, Mercosur

The UK keeps the legal right to make its own trade deals, but on food it can no longer offer anything that differs from EU rules, which is what most agricultural exporters want.

Partner	What they want from the UK	Effect of SPS alignment
CPTPP (incl. Australia, Canada, NZ, Japan, Mexico, Vietnam)	Acceptance of their standards as equivalent	CPTPP does not stop alignment (TAC, 2023), but GB can no longer recognise standards the EU does not
United States	Wider access for US farm goods, including hormone beef and chlorine-washed chicken	Committee found "limited room for further agri-food deals with the US"
Mercosur	Beef, poultry, soy and sugar access	No UK–Mercosur deal exists; any future one is limited to EU-compliant product

Mercosur, as an example. The EU's own agreement with Argentina, Brazil, Paraguay and Uruguay has applied provisionally since 1 May 2026 (European Commission). So Mercosur produce meeting EU rules can now reach the EU at lower tariffs, and from 2028 the same produce meets GB rules too. The UK could still cut its own tariffs, but it cannot offer Mercosur any easing of food standards beyond the EU's.

My view. This chips away at the "global Britain" trade case. The UK keeps the right to negotiate, but has given away the main concession farm exporters ask for. The government's answer is that it was never going to lower food standards anyway; critics reply that the point was the option to set its own.

Sources: TAC advice; Business and Trade Committee; see also the trade deals section above.

Fisheries: access to 2038, and where an NI boat lands

No new fishing access was given away on 20 November; it was given in May 2025, when EU boats' access to UK waters was fixed until 30 June 2038.

Access. The TCA moved 25% of the EU's pre-Brexit quota in UK waters back to the UK between 2021 and 2026, after which access was to be negotiated each year. In May 2025 the UK instead agreed to keep existing EU access for 12 more years, to 30 June 2038 (Commons Library), formalised by the TCA Specialised Committee on Fisheries on 19 June 2025 (Decision No 1/2025). The 2026 Joint Statement adds that both sides "will fully respect" it (para 47). The Commons Environment, Food and Rural Affairs (EFRA) Committee heard that "many fishers told us that the 12 year reciprocal access deal with the EU will not benefit the UK fishing sector" (EFRA report).

What the SPS deal adds. Fisheries management and the Common Fisheries Policy are excluded, so the UK still sets its own quotas and licences. Fish trade comes under SPS rules, and EU-caught fish landed outside UK waters can be sold in GB under EU minimum marketing sizes (SPS explainer).

My view on "take back control". The 2025 extension gave up the annual negotiation that was the UK's main lever on access. The SPS deal does not hand over more water, but it ties fish trade to EU rules while access stays locked until 2038.

An NI boat: Belfast or Warrenpoint versus Ardrossan

Where it lands	Sell in GB	Sell in Ireland and the EU	After 1 March 2028
NI port (Belfast, Warrenpoint, Kilkeel)	Yes, freely: "qualifying Northern Ireland goods have unfettered access" to GB, if dispatched from a registered or approved NI establishment	Yes, freely: NI is inside the EU's SPS area, no export health certificate	Unchanged
GB port (Ardrossan)	Yes, freely: it is GB produce	Now: export health certificate plus a catch certificate	Export health certificate goes; illegal-fishing (IUU) catch certificate stays
Landed in GB, then sent to NI	Not applicable	As above	Now: certificates and a CHED-P entry on TRACES; after 2028 most go, with IUU flexibilities extended

Sources: GOV.UK, moving fish to the UK; DAERA, moving fish and fishery products; fish and shellfish guidance.

Correction to the premise. Fish landed in NI can be sold into GB as well as the EU. Landing in NI is currently the better choice for an NI boat selling into both markets. From 2028 the gap narrows, because GB-landed fish loses its export health certificate, but the catch certificate stays.

Pork and the GB land bridge: one-way traffic?

Today it is one-way: NI pork moves freely to GB and to the EU, while GB pork faces certificates and checks going to NI or the EU. From 2028 most of that asymmetry goes for SPS purposes; customs remains separate.

Case 1: NI pork going out

Route	Now	From 1 March 2028
NI to Ireland or the EU, direct	No export health certificate	Unchanged
NI to GB, to stay in GB	Unfettered access	Unchanged
NI to the EU through GB, sealed, not unloaded (the land bridge)	No export health certificate or support attestation, though documents may be needed to show it is NI product	Unchanged in substance
NI to GB for processing or storage, then on to the EU	Needs a support health attestation from NI and an export health certificate in GB: it leaves as a GB export	GB–EU certificates go for most goods, so the distinction largely falls away

Source: DAERA, products of animal origin NI to GB FAQs and support health attestations.

Is NI pork "contaminated" by passing through GB? Not if it stays sealed in transit. It is if it is unloaded, stored or processed in GB: from then the EU treats it as a GB export and requires the GB paperwork. After 2028 that matters much less, because GB and the EU share the same SPS rules.

Case 2: pork from outside the UK and EU (say, Brazil) coming in

Route	Now	From 1 March 2028
Into GB	GB import controls	EU-level import controls in GB; inspections of some non-EU goods rise
Into NI via an EU port (Dublin)	EU border checks in Dublin, then free to move into NI	Unchanged
Into NI direct	EU border checks at an NI port	Unchanged
Into GB, then on to NI	GB goods to NI: certificates and checks at NI ports	Not confirmed. If GB applies EU import controls, cleared goods should move like GB goods; the papers do not say

Customs is a separate question. The SPS deal does not touch tariffs. Brazilian pork entering NI "at risk" of moving into the EU pays the EU tariff; pork moving from GB to NI is not TCA trade: it moves duty-free under the UK Internal Market Scheme, or claims the TCA preference only if it is "at risk" of entering the EU and meets the rules of origin.

Answer. For SPS, the traffic is one-way now and two-way after 2028. For customs and origin it stays as it is. The open question is third-country food cleared in GB and then sent to NI, which the published papers do not answer.

Open questions and what to do now

Open questions (none answered in the 20 November papers):

- How big is the UK's financial contribution, and what are the exit terms?
- What exactly does the dispute clause say about the EU Court?
- What happens to the border control posts at NI ports, and their staff?
- Which goods stay under NIRMS during the transitions, and for how long?
- Is there any NI-specific assessment of gains and losses?
- Will the European Partnership Bill give Parliament a vote on each new EU rule, or only on the treaty?

What NI businesses can do now

1. **Keep to current rules.** Nothing changes before 1 March 2028; expect stricter enforcement in the meantime.
2. **Map GB supply.** List what you bring from GB under NIRMS, plant health labels or certificates. That is where the savings will show.
3. **Check for GB-only inputs.** Pesticides, biocides, feed additives or novel ingredients approved only in GB will be phased out. Ask suppliers now.
4. **Watch the competition.** If you export to Ireland or the EU, assume GB rivals will be there with lower costs from 2028.
5. **Sign up for Defra and DAERA updates.** Sector guidance is due "throughout 2027".

6. **Price the carbon side too.** The SPS deal and the carbon market link come together; see The carbon deal: who pays, who gains, and what Northern Ireland loses.

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All opened 21 November 2026 unless stated.

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- DAERA, guidance on moving goods via the GB land bridge (SHA and EHC rules)
- House of Lords written answer HL12132 (EU CBAM does not apply in NI)
- Commons Exiting the EU Committee, oral evidence of Jacob Rees-Mogg MP, 24 January 2018 (the vassal-state test)

Items marked "search extract" were read from search results, not opened in full. The treaty text is not yet published; check against it when it is.

Robert J. Park is an independent environment, carbon and public affairs consultant based in Larne, Northern Ireland. robert@robertjpark.co.uk · 07450 349480 · robertjpark.co.uk · Status as at 21 November 2026. General information, not legal advice. Created with assistive technology including AI and re-checked against the official sources listed.