

Which?

Brexit no deal: a consumer catastrophe?

OCTOBER 2018

The potential for the UK to leave the EU on 29 March 2019 without an agreement in place (“no deal”) on future trade and wider cooperation with the EU has become a realistic possibility.

The government has published a series of technical notices setting out the implications of this scenario for businesses and, in some cases, consumers and what contingency planning is taking place or needs to happen.

These notices present a very stark picture of how exiting the EU with no deal could negatively affect consumers in multiple ways – increasing costs while decreasing both rights and choice.

The government’s intention is that if no UK-EU deal is secured, it may be possible for the UK and EU Member States to reach emergency or bare-bones agreements on some key areas to minimise the impact on both business and consumers and avoid the worst consequences. But it is clear that this cannot be guaranteed.

If the UK fell out of the EU without a deal, the immediate aftermath is likely to be chaotic, with many existing arrangements cut and no new agreements made to replace them. The disruptions and price hikes that government papers point to would have a direct and hard impact on consumers. It is difficult to determine how long it would take before deals would be put in place.

Which? has analysed the government’s no deal notices to see what that scenario would mean for consumers. The main impacts are set out in the body of this report in relation to travel, food, consumer products, energy and consumer rights. We have also drawn on information provided by relevant businesses and trade associations. These show clearly that a no deal situation would have severe consequences for consumers, even if comprehensive contingency planning could be achieved in time.

The success of Brexit will ultimately be defined by what it delivers for consumers and what matters to them most. Our four tests for a successful Brexit for consumers are whether it:

- Limits the potential for **price** rises and increases in the cost of living.
- Maintains or enhances the current high safety **standards**.
- Maintains or enhances consumer **choice** of a high-quality range of products and services.
- Supports consumers with a system that ensures their **rights** and access to redress.

The consumer response

Our latest consumer research shows that most people are unprepared for what “no deal” would mean in practice – and many do not understand how it would have multiple impacts across so many aspects of their daily lives.

When the everyday repercussions and government's plans on issues such as food and medical supplies were explained to people in our research, many people were shocked and questioned why they had not been made aware of the implications sooner.

“One thing that did stand out is that although they [friends and family] all watch the news and take a general interest in Brexit, they cannot believe that these possible [consumer rights] scenarios have passed them by... has the media even translated the jargon into real possible scenarios so the general population understand exactly what could happen and how it would affect their day-to-day lives?”

50 to 55-year-old female, East of England

“I think it will make life more difficult and expensive. If we land up with a no deal Brexit and have no deal or agreement on trade and borders with the EU, then it is easy to see how customs delays etc will cause problems.”

55 to 60-year-old male, South West

Once they had learned more about the potential realities of a no deal Brexit, participants felt those on low or fixed incomes would be particularly affected. While individual cost increases may be relatively small, the cumulative effect of these increases had the potential to be severe.

“Certainly, if no other effect [a no deal Brexit will create] a bigger divide between the haves and the have nots.”

60 to 65-year-old female, North West

“This is going to affect me greatly, as being a pensioner I have a fixed income and as prices rise I struggle to cope buying essentials and paying energy bills. I don't believe consumer interests are being considered at all.”

65 to 70-year-old female, North East

Prior to the release of the government's no deal notices, a Which? survey in early August 2018 found that only one in six (16%) UK consumers thought that the government had provided enough information about the potential impact of a no deal scenario – while 58% disagreed, with 32% strongly disagreeing. Only 14% agreed that the government is being open and transparent about how a no deal Brexit might affect consumers. More than half (58%) disagree and close to a third (31%) strongly disagree.¹

Our monitoring has shown that consumer concern about the impact of how we leave the EU has seen a significant increase since the referendum. The Which? Consumer Insight Tracker shows that 62% of people are now worried about Brexit – up from 39% in September 2016, shortly after the referendum.

From a range of scenarios in the event of a no deal Brexit, people were most concerned about the risk of higher energy prices (76%), increased cost of consumer goods (72%), medicine shortages (71%) and disruption to food supplies (70%). If the UK were to leave the EU without achieving a deal, it is likely that consumers would be affected by all of these issues and would have little time to prepare. This is why it is essential that it is avoided and a deal is reached.

Assessing no deal

Travel

The government has said that there could be significant disruption, which could mean increased costs and inconvenience for people travelling and going on holiday in the EU.

The government's papers outline that in the event of no deal, flights to the EU may no longer be able to operate. At the same time, coach travel, particularly regular coach services, such as National Express, may not be able to operate in the immediate aftermath. If travelling by car, people will need a driving permit for the country that they are going to. They will also need a green card from their insurer in case they are asked to show it. Passports with less than six months left will no longer be valid when travelling to the EU, potentially catching out many people going away for the Easter holidays.

Grounded flights

In the event of a no deal, UK and EU licensed airlines would lose the automatic right to fly between the UK and the EU, putting many flights at risk of being grounded.² Airlines would need to seek individual permission from EU countries. This would also require a safety authorisation from the European Aviation Safety Agency (EASA) because the UK regulator, the Civil Aviation Authority, would no longer be part of that agency. EU-licensed airlines would lose the ability to operate wholly within the UK (eg from Heathrow to Edinburgh) and UK-licensed airlines would lose the ability to operate intra-EU air services (eg from Milan to Paris).

The government has said that it envisages granting permission to EU airlines to continue to operate to the UK, and that it would expect EU countries to do the same, but it would prefer to agree a basic arrangement with the EU. The European Commission has previously acknowledged that a bare-bones agreement on air services would be desirable in the event of the UK leaving with no deal. However, flights would not operate on the same basis as they do at the moment, with more limited access to EU destinations. Without this agreement, the government has said that the UK could also try to reach arrangements with individual EU countries that would specify the conditions under which air services would be permitted.

The government has advised UK airlines that they should start consulting the national aviation authorities, within the relevant EU countries they operate to, for details of how they grant foreign airlines permission to operate.

It has also advised that people cannot expect any support from the government: “Passengers are responsible for ensuring that their insurance and ticket terms and conditions are sufficient to cover possible disruption; and should not expect government assistance in this situation.” Some travel operators and airlines are including clauses relating to the closure of airspace in their terms and conditions.

The UK also has air service agreements with 17 countries through its EU membership, including the United States and Canada. The government is working with these countries to agree replacement, bilateral arrangements that could come into force as soon as the UK exited. It has already agreed some of these and has said that it is “confident the remaining agreements will be agreed well in advance of the UK leaving the EU”. The UK also has separate agreements with 111 countries, including China, India and Brazil, which would not be affected by its change in EU membership.

The vast majority (84%) of consumers think it’s important that the government tries to maintain the same level of aviation access when negotiating the UK’s future relationship with the EU. More than half (54%) said this is very important, and only 9% thought it was not important.³

“I was surprised to realise that airlines have this agreement and it could stop abruptly on 29 March if there is no deal. I guess I had never really thought about all the consequences that a no deal really means and the impact this would have on quite literally everything – doing this survey has really opened my eyes to Brexit and all the implications. I think it’s fair to say I am worried about the impact no deal will have on flights that will affect getting goods into the country and about money coming into the country from tourism. I personally do not travel by plane so this will not affect me in that sense in the foreseeable future”.

50 to 55-year-old female, East of England

“The possible impact for me does not worry me to any large degree because common sense will prevail in the end. Should it happen I may miss the odd holiday, it’s no major deal to me.”

70 to 75-year-old male, East Midlands

“How will flights be possible if no agreement is reached?... Hopefully common sense will prevail and things will go smoothly.”

35 to 40-year-old male, South East

“If there isn’t any agreement, there would be an extension of existing rules. It’s common sense, I feel confident all will be fine short term... Long term there might be additional charges and delays in customs. I hope this can be avoided.”

45 to 50-year-old male, West Midlands

“It surprised me that an effect of a no deal could be grounded aircraft. Although this looks quite unlikely it has not been ruled out and is of great concern.”

70 to 75-year-old female, West Midlands

Airport security delays

At present, passengers flying from the UK and transferring at an EU airport for an onward flight do not have to be rescreened at that EU airport. If there is no deal, and the EU decides not to recognise the UK aviation security system (which it has indicated could be the case), then the government has outlined that passengers and their luggage will have to be rescreened when changing flights in EU hub airports.⁴ The government has warned that this “could have significant operational and cost implications for those EU airports, and passengers may have to factor increased time for rescreening into their travel schedule”.

Cancelled bus and coach services

The government has relayed that UK bus and coach operators may be unable to drive to the EU in a no deal scenario. The risk of this varies for regular services (eg National Express) and occasional ones (eg holiday tours). The UK is going to attempt to join an international agreement (“Interbus”) which would limit disruption for holiday tours, but this will not cover the regular services, so the government is hoping the agreement can be changed before March 2019 and that it will also be able to join Interbus time.

If these plans fail the government warns “it would be likely that no UK operators would be able to take coach services into the EU at least in the short term”. The government’s intention is that the UK would then try to put in place bilateral agreements with EU countries. Because of this potential halt in services if there is not a deal, the government has advised UK operators taking coach travel bookings in Europe (after 29 March 2019) to consider contractual terms with their customers. This would allow them to subcontract all or part of the coach travel to EU-based operators if necessary. This could mean people would have to switch coaches in order to continue with the EU part of their journey. The UK would permit EU buses and coaches to continue bringing passengers into and out of the UK.

Driving complications

The government’s papers also outline that people would no longer be able to freely drive from the UK to the EU. They would need an **International Driving Permit** (IDP) and the type needed would depend on where you were travelling to. If travelling to France and then on to Spain, two different types of permit will need to be bought in advance from an issuing post office. These permits would also be needed in advance when picking up a hire car in an EU country.

The type of IDP needed depends on which EU country you are visiting, and each type is valid for a different period. This is because EU countries belong to different international conventions, either the 1949 Geneva Convention on Road Traffic or the 1968 Vienna Convention on Road Traffic. The former lasts for 12 months and would cover Ireland, Spain, Malta and Cyprus. The latter is valid for three years, or for however long your driving licence is

valid, if that date is earlier. This type of IDP would be recognised in all other EU countries, as well as Norway and Switzerland. The IDPs will cost £5.50. From 1 February 2019, the government will begin providing IDPs at 2,500 post offices.

The government will aim for a comprehensive agreement with the EU to cover the continued recognition and exchange of UK licences after exit. If it cannot achieve this, it will also pursue agreements with individual EU countries. However, it says: “We cannot guarantee that we will have individual agreements with all EU states by exit day in the event of no deal.”

“While this will involve unnecessary complications, from the cost perspective it is not much to get the permit. The only thing is whether the permit would be available in time for my travel dates. Initially the demands would be higher, so the service might be delayed. That’s the only concern.”

35 to 40-year-old male, South East

“It is inconvenient and adds yet more cost to foreign travel. It is also something else to remember that you need to sort out some time before travel. The fact that there are two different types of IDP and that different countries require different IDPs and that the period of validity is different just adds to the problem. It is easy to imagine many people being caught out and not having the appropriate IDP.”

55 to 60-year-old male, South West

In the event of no deal, a **green card** would also need to be shown at the border. This is an international certificate of insurance issued by insurance providers to guarantee that the driver has the necessary third-party motor insurance cover for travel in the country being travelled to. It is not necessary to show a green card at the moment as this has been abolished for European Economic Area countries, as well as Andorra, Serbia and Switzerland.

The government has advised motorists the following: “You should expect documentation checks to be carried out when entering these countries. You can request a Green Card from your insurance provider free of charge, but insurers may decide to reflect production and handling costs in a small increase to their administration fees. If you have two insurance policies covering the duration of your trip (because the policy renews whilst you are away), you must ensure you have the correct documentation (1 or 2 Green Cards may be required).” It has also cautioned that in this event: “If you don’t have proof of third-party motor insurance cover, you may not be able to drive in that country. You may also be fined according to the law of that country.”

“I can see a potential for a mess if you have an accident abroad and then have to go back to that country to deal with your claim. It would be messy. I know it sounds complicated at the moment when contemplating getting a physical green card from your insurer, but as with all things, it wouldn’t take long to get used to it once implemented. But the cost should be made under £5 by law.”

35 to 40-year-old male, London

“Again the card can be provided, so one will be issued by companies, especially to all of us in Northern Ireland. The card will simply be an issued document with your insurance certificate.”

40 to 45-year-old male, Northern Ireland

“It’s potentially more paperwork or checks to be completed before you travel to make sure you’re covered in the event of an accident. Although it says costs are unknown it could be another penalty and a disincentive to drive in other countries. I would be concerned if I was in an accident in this country with an EU citizen that I would not be able to easily pursue a claim if another system is not in place.”

30 to 35-year-old male, North East

“Motorists will just have to make sure they obtain a green card if they are travelling to EU countries. I cannot see the cost of this being too high. But there could be problems in pursuing claims for a traffic accident in the case of a no deal.”

65 to 70-year-old male, Yorkshire & the Humber

Invalid passports

British passport holders would need to comply with different rules to enter EU countries that are part of the Schengen Agreement.⁵ The passport must have been issued within 10 years of arrival and have at least six months left on the date of arrival.

The government has advised: “If you plan to travel to the Schengen area after 29 March 2019, to avoid any possibility of your adult British passport not complying with the Schengen Border Code we suggest that you check the issue date and make sure your passport is no older than nine years and six months on the day of travel. For example, if you’re planning to travel to the Schengen area on 30 March 2019, your passport should have an issue date on or after 1 October 2009. If your passport does not meet these criteria, you may be denied entry to any of the Schengen area countries, and you should renew your passport before you travel.”

People going away for the Easter holidays could therefore be caught out if either of these apply – and would need to get a new passport in time. The government has suggested that: “If you are planning travel after 29 March 2019, and your passport will be affected by the new validity rules, we recommend you consider renewing your passport soon to avoid any delay, as the passport issuing service can get busy, especially in the spring.”

“These are tricky but fair enough points. While travelling to Europe, at least six months of passport validity is required. This has been the case with many other countries already while travelling from UK... But it might impact people who go to job in Europe. They might have to plan well in advance so this particular criteria is met. To me personally, it doesn’t impact much and also to my family members.”

35 to 40-year-old male, South East

“This will catch a lot of people out. Who renews their passport when there’s still six months left on it? Three months I can understand, but six? Also losing the extra months? What a rip off! Surely there must be some way around this? Come on government, sort it out.”

45 to 50-year-old female, South West

“I am very concerned that the Passport Office will be inundated with enquiries and having to issue more new passports than usual, and it has been known to struggle with high volumes in the past, backlogs could soon mount up, meaning that people may lose out on their travel arrangements.”

50 to 55-year-old female, East of England

“To this I say ‘well done UK government’ for making this easy to deal with before the event. I have always made sure my passport has plenty of time on it for travel because I do travel outside of the EU and these rules already apply. So this means nothing to me.”

70 to 75-year-old male, East Midlands

Leaving your pet behind

Under the EU Pet Travel Scheme, owners of dogs, cats and ferrets can travel with their animals to and from EU countries provided they hold a valid EU pet passport. This could change in the case of no deal.⁶

The government outlines that pets would continue to be able to travel from the UK to the EU, but the requirements for documents and health checks would differ depending on what category of country the EU designates the UK as we leave. There are three categories linked to a country’s animal health status – part 1 listed, part 2 listed and unlisted – which determine how onerous the conditions would be. The government is “seeking technical discussions with the European Commission to allow the UK to become a listed third country” as this would require only minor changes to the documentation needed to take your pet to the EU.

The government has however warned that: “Should the UK become an unlisted third country, pet owners intending to travel with their pet from the UK to EU countries would need to discuss preparations for their pet’s travel with an official veterinarian at least four months in advance of the date they wish to travel. This means pet owners intending to travel to the EU on 30 March 2019 would need to discuss requirements with their vet before the end of November 2018”.

On arrival in the EU, people travelling with their pets in this scenario would also be required to report to a designated Travellers’ Point of Entry. They would be asked to present proof of microchip, vaccination and blood test result (against rabies), as well as their pet’s health certificate.

Credit card surcharges

As of 13 January 2018, EU rules banned retailers from charging customers a fee to use Visa and Mastercard credit or debit cards.⁷ The UK passed its own legislation, meaning the surcharge ban will continue to apply for UK purchases after Brexit. But consumers buying goods from the EU, or from

EU-based companies, may no longer be protected. European companies – including airlines and travel providers that previously frequently levied card surcharges – could re-introduce them for UK customers. Prior to the rules being passed, consumers were hit by up to 3% surcharges for booking with credit cards on popular European airlines, such as Vueling and Eurowings.

The government has advised that “the cost of card payments between the UK and EU will likely increase, and these cross-border payments will no longer be covered by the surcharging ban (which prevents businesses from being able to charge consumers for using a specific payment method).”

“The use of credit cards would mean extra fees and surcharges in Europe. This will be unnecessary burden on my pocket.”

35 to 40-year-old male, South East

“It seems likely that there is potential for EU businesses to rip off customers from the UK if they are not bound by the surcharging ban. If the surcharges do happen and costs from buying something from a business in the EU increases, then yes, it may well change my purchasing behaviour, I am on a limited income and have to be careful what I spend and I already weigh up the best place to buy from.”

55 to 60-year-old male, South West

“Holidays abroad are already expensive without extra charges for using your card. It is very unfair that we are more likely to be ripped off as consumers. I certainly would not use my card abroad and would probably take cash or travellers cheques depending on currency rates. I think the government need to ensure that a no deal does not happen as there will be too many negative impacts on consumers in the UK.”

70 to 75-year-old female, West Midlands

“The government paper was very technical and boring, the average person certainly wouldn’t want to read it by choice but it is useful to show they are sensibly planning for a no deal... [News articles also seem] very negative but that’s because the consequences of a no deal would be exactly that and it highlights some of the main potential problems.”

30 to 35-year-old male, North East

Loss of healthcare cover

The European Health Insurance Card (EHIC) would no longer apply, without any reciprocal agreement in place. People would therefore need to rely on travel insurance and some people may find it difficult to get cover for certain conditions. People with long-term conditions would be most affected, as for example the EHIC covers the provision of oxygen therapy and renal dialysis as well as more routine medical care. Some 83% of consumers say it is important for the UK to uphold access to healthcare while travelling in the EU.⁸ Just under half (46%) said they would be very or extremely concerned if no agreement was reached to maintain access to the EHIC scheme.⁹

The cost of travel insurance would likely rise because it currently takes into account what is provided with EHIC. It has been estimated that costs could rise by 10-20%, but certain groups, such as older travellers, would be likely to bear a higher proportion of the increased costs.¹⁰

The scheme gives people the right to access state-provided healthcare during a temporary stay in another EU Member State, European Economic Area (EEA) country or Switzerland. It covers treatment that is medically necessary until their planned return home on the same basis as it is provided to people who live in the country – either free or subject to a contribution.¹¹ It also covers pre-existing medical conditions and routine maternity care.

“I got the EHIC card when they were first introduced and have always renewed them upon near expiry. I have been extremely lucky that I have never needed to use the card or go to a foreign hospital. I also have annual travel insurance, again which I have never used. Of course the insurance companies will be rubbing their hands with delight to increase the premiums. So yes I will grumble at price hikes.”

70 to 75-year-old male, East Midlands

“Travel insurance will rise in cost. Significantly. As with everything else this will [be] a bad thing for the consumer... I think more people will travel without insurance as a result.”

40 to 45-year-old male, Northern Ireland

“If the worst comes to the worst the cost of travel and health insurance is bound to rise significantly, meaning that some people will not be able to afford to travel or they will travel without taking out insurance. But at the end of the day I honestly cannot see travel deal not been struck as both sides have to much to lose.”

65 to 70 years old, Male, Yorkshire & the Humber

“I had not realised that travel insurance costs took into account treatment that would be available under the EHIC. I thought I was reasonably clued up on most aspects of a no deal – but this one completely passed me by.”

60 to 65-year-old female, North West

Roaming

People currently benefit from free mobile roaming when they are travelling in the EU. The EU Roaming regulation requires mobile operators to apply a default financial limit for mobile data usage of €50. Operators are also required to send an alert once a person’s device reaches 80% and then 100% of the agreed data roaming limit. These requirements apply across the world, not just in the EU.

The government has said that, in the event of a no deal, “surcharge-free roaming when you travel to the EU could no longer be guaranteed”¹² and that “the availability and pricing of mobile roaming in the EU would be a commercial question for the mobile operators. As a consequence, surcharge-free mobile roaming in the EU may not continue to be standard across every mobile phone package from that point”.

Such roaming provisions have been popular with people, with two thirds (65%) saying it is important to maintain this in the future, and 26% saying they had taken advantage of it in the past 12 months.¹³ Some companies have said they will not introduce roaming charges in the event of no deal, which is welcome. However, it should be noted that the continuation of this policy will be reliant on these companies' internal policies and could be subject to change in the future.¹⁴

The government has said that it would legislate to ensure that the requirements on mobile operators to apply a financial limit on mobile data usage while abroad is retained. The limit would be set at £45 per monthly billing period. It would also legislate to ensure the alerts at 80% and 100% data usage continue.

The government has set out the following advice:

- Check the roaming policies of your mobile operator before you go abroad.
- Consider what your operator is saying about surcharge-free roaming post-EU exit.
- Check your operator's terms and conditions in detail – particularly if you are a heavy user of mobile services in the EU.
- Be aware of your rights to change mobile operator (“switching”).
- Be aware that Ofcom rules allow cancellation of your contract free of charge if your operator makes certain price increases.
- Know how to turn off your mobile data roaming on your mobile device if you're worried about being charged for data usage in the EU.
- Ensure you understand the alternatives to using mobile networks when abroad. Wi-fi is widely available, which would allow you to make calls, send text messages and use data for free or with little charge.
- Understand which services might be expensive to use and which are likely to be cheap. For example, streaming live television or sending large video clips (MMS) could be expensive as they use large amounts of data.

It has also issued specific advice for consumers and businesses in Northern Ireland to be aware of “inadvertent roaming”. “This is when a mobile signal in a border region is stronger from the country across the border. In this case, someone from Northern Ireland in a border region of Northern Ireland would roam onto an Irish network as the mobile phone signal is stronger from a network in Ireland.”

**Where the government's no deal travel plans
are failing Which?'s consumer tests:**

Prices ✘	Rights ✘	Choice ✘	Standards
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Travel: what consumers need

To avoid such a scenario and achieve positive outcomes for consumers, Which? has asked the UK government to reach a deal with the EU that:

- Includes unlimited access to all EU destinations for all UK airlines, as under current arrangements.
- Ensures the same level of access to EU airlines flying to other destinations, such as the US, via the UK.
- Ensures that current arrangements for UK airlines with countries outside the EU are replicated, and look for opportunities to increase the choice for UK consumers.
- Secures reciprocal agreements between the UK and EU on continued access to free or reduced-cost healthcare for people while they are travelling.
- Includes the abolition of card surcharges.
- Achieves an agreement with the EU to retain the current cap on wholesale roaming charges and influence any further changes to this.
- Enables continued road travel abroad without having to physically show a green card or buy additional insurance, and ensures that victims of traffic accidents can pursue claims in their home country.

Domestically, the government should also:

- Put roaming on the agenda for future trade agreements with non-EU countries to expand the roam-like-at-home (RLAH) benefits for people travelling to a wider range of destinations.

Food

It is possible that food supplies could become disrupted and food prices could increase. There could be greater food safety and fraud risks.

No deal would mean that food would stop being freely traded between the UK and EU after 29 March. The government has warned that new customs rules and tariffs, as well as some border controls, would have to take effect immediately after exit. As around 30% of what we eat is imported from the EU, this would have an immediate impact on food supplies and people's food choices.

Shortages and higher prices

The government has asked businesses to prepare for the likely changes to customs and excise procedures and impacts on their supply chains. Trade would be on a World Trade Organisation (WTO) Most Favoured Nation (MFN) basis. It says: "The EU would apply its MFN rates to goods imported into the EU from the UK. The UK will apply its MFN rates to goods imported into the UK from the EU. The government will determine and publish these new UK duty rates before the UK leaves the EU, which may be different to the current EU rates."

This means that food prices could increase – particularly for products such as meat and dairy depending on how the UK decides to apply tariffs. The UK could choose to drop or remove tariffs, but it couldn't just do this for the EU, it would have to do it for all countries that exported to the UK (eg South American countries, the US and Australia as well) as these MFN rules mean that a WTO member country cannot apply different tariffs to different countries, unless there is a trade deal in place.

Assuming the UK stuck to the same tariffs that the EU applies to countries exporting to the EU, they would on average be 22%, rising to as much as 56% for beef. The British Retail Consortium (BRC) has calculated the likely increase in retail price attributable solely to tariffs to be in the ranges of 5-29% for beef, 6-32% for cheddar cheese, 9-18% for tomatoes and 5-10% for broccoli.¹⁵

Dropping or removing tariffs could lower prices, which might be good. But not if accompanied by a reduction in the food standards and quality that consumers say is important. And, by undercutting UK producers on price, it would be likely to reduce consumer choice, in particular of UK produced food.

"We have import restrictions on goods from outside the EU which travel further and still arrive in shops. It's all pure panic, but yes there would be a period of pain followed by increased UK production and cheaper supply from non EU countries"

45 to 50-year-old male, West Midlands

"While things may adjust over time, for a period it seems clear that there would be a shortage of certain foodstuffs. On a personal basis, as someone who enjoys a lot of the products mentioned and a varied diet, it could restrict what I am able to buy and lead to a more limited diet."

55 to 60-year-old male, South West

Which?'s Brexit Consumer Tracker found that 93% of people think it is important to maintain food standards after Brexit. It also found strong support for buying UK produced food: 81% of people think it is important that milk is produced in the UK, 80% in the case of dairy, 77% for poultry and 72% for red meat. Some 71% of people also said they wouldn't buy food if it was cheaper but produced to lower quality standards.¹⁶ This finding was consistent across socio-economic groups.

More immediately, leading supermarkets have told us that they would expect severe disruption to food supplies because of the introduction of customs and border controls. Modelling by Imperial College has suggested that if the current average paperwork clearance of two minutes at Dover was increased to just four, there would be a 20-mile tailback within 24 hours on the UK side, which would soon escalate.¹⁷ The Department for Transport is working on a contingency plan called "Project Brock", which would allow for the flow of traffic in both directions on the M20, using a contraflow on one carriageway while the other is used to queue lorries.

A lot of the food that comes from the EU is perishable, fresh food that arrives on a "just in time" basis. Foods that have a short shelf life coming from the EU, such as fruit, salads and dairy products, would be affected. One retailer told us: "Many of these are products that we pack and date code at source and so any delay would shorten the time to sell. If we were to revert to packing in the UK, this would require double-handling of products and the associated costs of doing this." If people also started to stockpile in preparation, it told us that it "would expect empty shelves across multiple products and categories and a huge impact on everyday consumers". Another retailer told us that perishable foods would be first hit, but if delays continued any EU imports could be affected.

"I did not realise that so much of our food supply is from the EU. I am very worried that prices will be too high and will greatly affect people in this country who are already struggling. And it sounds like we will be paying higher prices for a poorer quality and freshness of food".

70 to 75-year-old female West Midlands

Safety and fraud risks

The government has been clear that in the event of no deal it would not put in place any import controls for animals, animal products and animal feed products coming from the EU.¹⁸

It is developing a new import notification system (TRACES – the Trade Control and Expert System) in case it can no longer be part of the EU system, but imports coming from the EU would not need to be notified.¹⁹ It says: "There would be no change on the day the UK leaves the EU to current import controls or requirements for notifications of imports of live animals and animal products for imports direct from the EU. These imports do not need to be notified on TRACES at the moment and, in order to ensure a smooth transition, the government would not introduce new requirements at the point the UK leaves the EU".

Changes would apply to controls over imports of non-EU animal products and high-risk food and feed from countries outside the EU, but which move through the EU before arrival in the UK (in transit). Importers would need to notify the UK authorities using the new import notification system and would be directed to a UK border inspection post. These imports are currently checked at other EU ports (eg Rotterdam, Dublin), so once the UK is no longer in the EU this would not happen, and they would require additional health checks at ports. This also has implications for capacity and specialist staff at ports to do these checks.

At the moment UK and EU legal requirements and enforcement systems are aligned, but stating that there wouldn't be any checks could send a signal to fraudsters (such as those who decided to substitute beef in the 2013 horsemeat scare) that they are more likely to get away with it. If food prices rose and there were shortages of certain products, the incentives to cut corners or try to substitute ingredients for cheaper and potentially less safe ones could also be greater.

Our most recent consumer research looking at no deal scenarios found that 3 in 5 people (60%) would not be confident that the government would have adequate staff in place to deal with checking imported food standards. More than a quarter (28%) were not confident at all.²⁰

"I firmly believe that in the case of no deal, there will be free trade between both parties because both side will have to much to lose. But if I am wrong I would not be happy at all if standards were dropped on checking food that came into the UK."

65 to 70-year-old male, Yorkshire & the Humber

"Surely they can't reduce border checks, it's madness to even contemplate it. Yes it would cut the time for food getting to shops, but isn't safety paramount?"

65 to 70-year-old female, North East

"The only potential benefit that could come out of this is an increase in jobs for the agriculture and food industry, as the UK would be forced to compensate for the loss so, therefore, the farmers would be paid a lot more and more unused land would be used to try to grow as much food and animals as possible."

20 to 25-year-old female, South East

"This is extremely concerning as it leaves consumers wide open to being exploited by criminals. There is a huge worldwide problem of fraud around food – you only have to look at the horsemeat scandal a few years ago for one example."

55 to 60-year-old male, South West

"If a transition period is agreed, then everything can be sorted in a smooth measured way. If not, the UK doesn't have a great record with big projects so yes there will be a big 'blip'. But if I can't buy tomatoes on a few occasions I won't die."

45 to 50-year-old male, West Midlands

**Where the government's no deal food plans
are failing Which?'s consumer tests:**

Prices ✘	Rights	Choice ✘	Standards ✘
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Food: what consumers need

To avoid such a scenario and achieve positive outcomes for consumers, Which? has asked the UK government to reach a deal with the EU that:

- Avoids friction in the supplying of food goods to the UK.
- Secures cooperation with key EU networks and intelligence systems to ensure the continuation of the rapid exchange of information between the UK and EU countries about food safety risks and dangerous imports.

As well as domestically:

- Take the opportunity to replace the EU's Common Agricultural Policy (CAP) with a joined-up food and farming policy.
- Maintain current food safety, quality and welfare standards, ensuring a high level of protection.
- Ensure that food standards are not traded away as part of any trade deals with countries that have lower standards for food and safety.
- Enhance the UK's food enforcement system to ensure there is sufficient independent capacity, skills and intelligence sharing to deal with any new challenges for food safety and standards. This includes border controls and checks on high risk foods.

Consumer products

There could be wider disruption to supply chains for consumer goods, which would mean increased costs. The UK would need to have new systems in place ahead of exit to assure consumers that there would be no risk from unsafe products.

As with food, the end to free trade with the EU would mean potential for disruption to supply chains and rising costs as a result of customs and border controls. Although generally not as high as for food products, tariffs could also be an issue for non-food consumer goods, leading to price rises.

Disruption, delays and price rises

The government's technical notices advise that businesses²¹ "importing goods from the EU will be required to follow customs procedures in the same way they currently do when importing goods from a country outside the EU", and that "this means for goods entering the UK from the EU an import declaration will be required, customs checks may be carried out and any customs duties must be paid".

In the event that the UK and the EU does not have a Free Trade Agreement (FTA) in place in a no deal scenario, trade with the EU will be on non-preferential, World Trade Organisation terms. This means that Most Favoured Nation (MFN) tariffs and non-preferential rules of origin would apply to consignments between the UK and EU.²² As with food products, any additional costs or disruption to businesses and their supply chains will also impact on consumers.

Cars and medicines are examples of the diverse range of products that are currently freely traded between the UK and EU, often on a just-in-time basis. But a much wider range of consumer goods would also be affected. For example, the British Retail Consortium (BRC) has stated that disruption to just-in-time sourcing chains would affect products from the furniture and home improvement sector, where people are used to efficient delivery and click-and-collect.²³

Cars and parts

The Society of Motor Manufacturers and Traders (SMMT) has warned that no deal would have a negative impact for the car industry and consumers.²⁴ If WTO tariffs were applied, these could be up to 10% on cars and parts. Around 69% of UK cars are imported from the EU. The SMMT has stated that UK buyers of a car or van from the EU would be faced with £1,500 and £1,700 increases respectively if manufacturers and their dealer networks were unable to absorb these additional costs.

The SMMT has also raised concerns that: "Some seven out of every 10 cars registered by UK motorists come from factories in Europe, meanwhile UK car plants send more than 40% of their output to the Continent. In addition, the tens of thousands of parts making up a vehicle cross EU borders multiple times before final assembly, with the majority of components going into UK-built cars coming from EU suppliers."

The government's no deal notices have also highlighted that in the event of no deal, vehicle and (where relevant) component manufacturers would need to obtain a UK type-approval before placing their products on the UK market. EC type-approvals would no longer be valid.²⁵

The government plans to issue provisional UK type-approvals to manufacturers that already have EC type-approvals to ensure that products can continue to be sold and registered in the UK. This approval would be time-limited (eg two years), while manufacturers sought full UK type-approval from the Vehicle Certification Agency (VCA). If manufacturers are subject to extra costs, these are also likely to feed through to consumer prices.

Medicines

Almost three-quarters (73%) of pharmaceutical imports come from the EU²⁶ and so if there was a no deal, access to pharmaceutical products could become at risk. The rapid supply of medicines is also important because some can become unusable if delayed. They may need to be kept under temperature control, which requires the vehicles transporting them to keep their engines running while waiting at any border controls. The Chair of the Medicines and Healthcare products Regulatory Agency (MHRA) has expressed concern that all insulin used in the UK is currently imported – and that it has to be transported under temperature control.²⁷ As with food, the way that supply chains work has meant that there has been limited need for warehousing to store products.

Materials used for medical scans could also be in short supply. Outside of Euratom, which oversees trade in nuclear materials, access to radioisotopes used for nuclear medicine scans of vital organs and bones could be limited. The UK relies on importing nuclear radioisotopes and these come mainly from the Netherlands, France and Belgium. Approximately half a million scans are performed annually using imported radioisotopes. They could still be bought from some non-EU countries that are outside Euratom (China, South Africa, Australia, Egypt and Russia) but supplies may more expensive and not be as reliable. As isotopes have a short half-life, they cannot be stockpiled.

“I knew there would be some issues with food deliveries to supermarkets however I hadn’t even considered how medicines would be impacted. Although food issues can be inconvenient I’m very worried how people who need medicines, particularly nuclear medicines might be affected. Having had many family members with cancer before I feel especially worried about how the government might provide a stockpile for those medicines, or even if the UK will begin to produce them all itself”.

20 to 25-year-old female, Yorkshire & the Humber

“No this is not a problem I had heard about with regards to Brexit. It is very concerning for both myself, as I have regular repeat prescriptions, and also for many others... This is highly concerning, especially for those who need medicines stored in a certain way with a limited shelf life.”

70 to 75-year-old female, West Midlands

“I was shocked to read the article on medicines. It hadn’t crossed my mind that this could be affected. The amount of people who rely on these imported medicines to live is huge. Also the possibility that some scanning materials could become too expensive to use on the NHS is a worrying thought. All of the media coverage I’ve seen had been around food and factories/small businesses – why haven’t I heard anything about this? Genuinely worried about this.”

45 to 50-year-old female, South West

“If there is a no deal the thing that would worry me most is dodgy medicines and food getting into the country. But I am sure the government and agencies will get things put in place to counteract these fears.”

65 to 70-year-old male, Yorkshire & the Humber

NHS England chief executive Simon Stevens has stated that there is planning being undertaken “around securing medicine supply and equipment under different scenarios”.²⁸ The government has published a notice setting out how the UK’s Medicines and Healthcare Regulatory Authority (MHRA) would need to immediately take on responsibilities, including approvals undertaken by the EU for medicines on the UK market.²⁹

Assessing product safety

In the event of a no deal the UK would immediately fall out of all the EU agencies and regulatory bodies that are responsible for conducting safety assessments, meaning that UK bodies would have to take on these functions to ensure consumer safety.

As well as the European Medicines Agency (EMA), in the case of the MHRA, this includes the European Chemicals Agency (ECHA) and European Food Safety Authority (EFSA), as well as the European Aviation Safety Agency (EASA). It would also be outside the safety alert systems that the UK operates – including the Rapid Alert System for Food and Feed (RASFF) and the Rapid Alert System for Dangerous Non-Food Products (RAPEX) by which EU Member States alert each other to potential risks.

While the UK will need to build up national capacity in these areas in any case, this would be challenging to have a fully functioning system in such a short timescale, particularly as it requires specialist expertise. In the case of chemicals regulation, the government has set out that it would “ensure UK legislation replaces EU legislation via the EU Withdrawal Act, establish a UK regulatory framework and build domestic capacity to deliver the functions currently performed by ECHA.”³⁰

Consumers feel strongly on this issue, with 94% saying it is important that there are government checks in place to make sure consumer products comply with legal requirements before being put on sale.³¹

**Where the government's no deal consumer products plans
are failing Which?'s consumer tests:**

Prices ✘	Rights	Choice ✘	Standards ✘
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Consumer products: what consumers need

To avoid such a scenario and achieve positive outcomes for consumers, Which? has asked the UK government to reach a deal with the EU that:

- Avoids friction in the supply of consumer goods.
- Secures cooperation with key EU networks and intelligence systems to ensure continuation of the rapid exchange of information between the UK and EU countries about food safety risks and dangerous imports. The UK should lead in strengthening international networks with a wider range of countries for food safety and food fraud.

As well as domestically to:

- Overhaul the product safety regime, including the creation of a centralised, independent body to enhance consumer protection and prepare for risks that may be posed by a potentially more complex trading environment.

Consumer rights

Consumers could find it much more complicated to enforce many of the rights they expect when buying goods from EU companies, whether shopping online or when on holiday. It could also be much more difficult for people taking legal action against companies based in EU countries.

In the event of no deal, while existing consumer rights would continue in UK law, through the UK Withdrawal Act, consumers would see a dramatic loss of these rights in practice because it would be much more complicated to enforce them where goods or services originate in the EU. This includes consumer rights where they have been misled or sold faulty goods – but also for specific protections, including those relating to package travel or timeshares, for example.

Pursuing your consumer rights abroad

Reciprocal arrangements for enforcement and market surveillance between the UK and public authorities in EU countries – whether for product safety or issues relating to unfair trading and consumer rights – would immediately end in the event of a no deal.

At the moment, the UK authorities (eg the Competition and Markets Authority) can work with their counterparts in other Member States to ensure that consumer cases are investigated through the Consumer Protection Co-operation (CPC) Network. This would also apply to reciprocal arrangements for alternative dispute resolution (eg ombudsman schemes) that people can use where a business has failed to deal with their complaint. The EU's online dispute resolution (ODR) platform gives people access to the appropriate bodies to pursue cases in different member states, but would no longer apply.

The government has not published consumer advice on this yet. But the consequences would be that it would be harder to get issues resolved such as being ripped off by a hire car company, being mis-sold holiday accommodation, or getting a refund for goods bought online from a company originating in an EU country that were faulty, or did not fit with the way that they had been described. People would have to take these up with the authorities in the country the business was based in.

Complicated litigation

In more extreme cases, where people needed to take legal action against a company in an EU member state (for example for a faulty or unsafe good or misleading good or service they have been sold), current arrangements allowing them to issue their claim in their home courts and for judgments to be more easily enforced across the EU would no longer apply – or be much more limited.

The government has advised that: “Any party to a cross-border legal dispute, including businesses, consumers and families, would need to consider the effect that these changes would have on any existing or future cases involving parties in EU countries. Where appropriate you may wish to seek professional legal advice on the implications of these changes for your individual circumstances”.³²

“As for not being protected around purchases, I guess the sensible thing to do is use British intermediaries, who carry out their own checks for us, at an extra cost of course.”

45 to 50-year-old female, South West

“I would perhaps be less likely to purchase goods from abroad due to the lack of rights, plus probable pound’s devaluation. I feel I would need to update my limited legal knowledge due to changes in the law and so will legal firms.”

25 to 30-year-old male, London

Where the government's no deal consumer rights plans are failing Which?'s consumer tests:

Prices ✘	Rights ✘	Choice ✘	Standards
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Consumer rights: what consumers need

To avoid such a scenario and achieve positive outcomes for consumers, Which? has asked the UK government to reach a deal with the EU to:

- Secure cross-border cooperation on consumer rights.
- Secure reciprocal judicial arrangements so that consumers are in a position to privately enforce their rights through the UK courts for goods or services originating in an EU or EFTA country.

As well as domestically:

- Take the opportunity to maintain its world-leading consumer rights framework, deliver competitive markets, and put in place a system that better serves consumers by enforcing their rights.
- Ensure the CMA is fully equipped to take on new competition and enforcement responsibilities.
- Underpin the consumer rights regime with a more effective system of consumer enforcement.

Ensure effective scrutiny where regulatory and technical responsibilities are transferred from the EU to the UK so that people can have confidence that there are robust, consumer focused regulators in place post-Brexit. This includes where responsibilities are transferred from EU agencies to new or existing UK regulators.

Energy

Loss of (or additional costs for) energy inter-connection could put pressure on domestic supplies over time. There would likely be a significant impact for electricity supplies and prices for consumers living in Northern Ireland.

Our research shows that consumers would be the most concerned (76%) if a no deal Brexit resulted in higher energy costs because of disruption to supplies from the EU.³³

Currently, around 12% of the UK's gas and 5% of its electricity comes from the EU,³⁴ with additional gas coming from Norwegian pipelines. The UK has interconnectors with France, The Netherlands and Ireland, and three more are under development to Belgium, Norway and Denmark. These interconnectors may not be operational on day one if there is no agreement in place. While there may not be an immediate impact from day one for people in Great Britain if there was no deal, research commissioned by National Grid estimates that UK consumers could face £500 million a year of costs by the early 2020s as a result of being outside the EU's Internal Energy Market (IEM).

Northern Ireland (NI) would be in a different situation to the rest of the UK as it has a single electricity market (SEM) with Ireland. This relies on cross-border trading. NI has three interconnectors with the Republic and one with Scotland. The government has considered short-term electricity being provided by military generators on barges in case these interconnectors with Ireland no longer flow, which would be very costly. If interconnection remained unavailable in the long term, it would still take around 10 years for NI-GB interconnectors to be built, and even longer for new permanent power generation in NI.

“It’s really important that our energy supplies are secure and we can afford them. Vulnerable people already die every winter because they can’t afford to put their heating on; any increase in price would surely increase the number of deaths and illnesses from the cold. There must be an agreement in place before March.”

45 to 50-year-old female, South West

“If the interconnectors only account for 6% now it’s unclear how much our energy bills would rise by, and it doesn’t say when the number would rise to 20%. Although I can see that energy companies would use any excuse to raise bills again”.

30 to 35-year-old male, North East

“We are talking about a small percentage of energy being affected, 6% if I read correctly... if they put up tariffs we would be forced to come up with better energy plans at home. It might make prices go up a little in the short term, but it will be more beneficial for the UK in the long run to have a better energy policy.”

35 to 40-year-old male, London

“Although the no deal impacts on climate change are obviously important, the main issue that will affect me and my family is the potential increase in prices. Because it’s something that has to be paid and if we’re forced to pay more we will most definitely have to make cuts in our lives elsewhere to afford it.”

20 to 25 -year-old female, Yorkshire & the Humber

“This subject slightly baffles me. I thought Paris was a world-wide gathering, in order to fight global warming. Interconnectors also confuse me. What is clear is that bills will increase, and Northern Ireland will run on generators – how ridiculous. For our home we would have to cut back on heating and use of electricity.”

45 to 50-year-old female, South West

Where the government’s no deal energy plans are failing Which?’s consumer tests:

Prices X	Rights	Choice	Standards
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Energy: what consumers need

To avoid such a scenario and achieve positive outcomes for consumers, Which? has asked the UK government to reach a deal with the EU that:

- Maintains open energy trading arrangements between the UK and EU through the negotiations in order to ensure there is ongoing flexible access to gas and electricity to help avoid increased costs for consumers.
- Maintains the single electricity market for Ireland and Northern Ireland.
- Secures continued cooperation with the regulatory and standards bodies that govern the cross-border energy market, including Euratom.

As well as domestically:

- Carry out effective consumer engagement to shape a successful future energy policy which maximises benefit for consumers.

A Brexit that delivers for consumers

Which? wants the government to deliver a Brexit that puts consumers first. Launched in March 2018, our Consumer Charter for Brexit set out our vision for an economy where people are supported by high levels of rights and protection – and with greater access to quality, affordable products and services.

The success of Brexit will ultimately be defined by what it achieves for consumers and what matters to them most. Our four tests for a successful Brexit for consumers are whether it:

- Limits the potential for price rises and increases in the cost of living.
- Maintains or enhances the current high safety standards.
- Maintains or enhances consumer choice of a high-quality range of products and services.
- Supports consumers with a system that ensures their rights and access to redress.

Our Charter set out the priority issues to be addressed to reassure consumers that Brexit will avoid disruption, and achieve a better deal for them, including in relation to the choice and supply of food, how people travel, energy prices and security and the wider system for consumer rights and protection.

Which? has been championing the cause for consumers since 1957, asking probing questions of businesses and manufacturers and pursuing the answers that put consumers in the driving seat. Our advice helps people make informed decisions, our campaigns tackle consumer detriment to make everyone's lives fairer, more simple and safer, and our services and products put consumers' needs first to bring them better value.

Today, Which? has more than 1.3 million members and supporters, making us the largest independent consumer body in the UK. This year, tens of thousands of people have supported our Brexit Charter, pressuring government to achieve a Brexit that puts consumers first.

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