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21. januar 2020

Høring vedrørende dansk interessevaretagelse i forhold til de kommende frihandelsforhandlinger mellem EU og Storbritannien.

Generelle bemærkninger

Med en tjenesteeksport til briterne på 60 mia. kr. og vareeksport på 46 mia. kr. i 2018 har Danmark indlysende tunge økonomiske interesser på spil i de kommende forhandlinger mellem EU og Storbritannien om en frihandelsaftale. Nationalbanken har tidligere skønnet, at over 50,000 danske arbejdspladser er knyttet op på vores eksport til briterne. Blandt Dansk Erhvervs medlemsvirksomheder er der både mange danske serviceeksportører i forhold til Storbritannien indenfor transport, turisme og rådgivning og vareeksportører især indenfor medicin, medicinsk udstyr, beklædning, forarbejdede fødevarer og velfærdsløsninger. Som det fremgår af tallene for vores eksport til Storbritannien, vil det ikke være acceptabelt at indgå en aftale, hvor tjenesteydelser ikke indgår. Selvom tidsplanen for handelsaftalen er stram, kan og må det ikke være en løsning, at hovedparten af vores eksport til Storbritannien ikke er omfattet, og at det derfor reelt ender i et no-deal scenarie for tjenesteydelser.

Dansk Erhverv opfordrer til, at Udenrigsministeriet løbende sikrer en tæt inddragelse af de relevante erhvervsorganisationer med henblik på, at mange forskellige brancheinteresser i dansk erhvervsliv i forhold til Storbritannien kan blive kanaliseret ind til forhandlingsbordet med briterne. Nedenstående specifikke bemærkninger er på engelsk som ønsket i høringen.

Specifikke bemærkninger

Offensiv interesse:

Tariffs

Continuation of zero tariffs horizontally across all sectors must be a central Danish priority as any introduction of even minor tariffs would be disruptive and likely have unintended, negative economic consequences for many Danish companies and in particular SMEs. It is important to bear in mind that the business model for hundreds of Danish exporters in various sectors vis-à-vis the UK has been the zero tariffs of the EU's Internal Market. Given the fierce competition within many product categories on the UK market, even small tariffs could reduce Danish market shares.

Offensiv interesse:

Pharmaceutical & medical equipment:

In money terms, the life science industry is the second most important component in Danish exports world-wide (only surpassed by shipping). Besides ensuring the closest possible alignment between EU-regulation and future national regulation in the UK governing this industry, it is essential also to ensure a smooth transitioning of the UK's exit from the EU-system of designated bodies that are authorized to pre-approve, approve and inspect medicine, medical equipment and medical production facilities in the EU. It is the understanding of the Danish Chamber of Commerce (Dansk Erhverv) that important and pragmatic deals have already been struck between UK national health authorities and the European Medical Agency about this specific issue. Hopefully, pragmatism and efficient business-friendly modalities for the future co-operation will prevail and be instituted.

Offensiv interesse

Services/Transportation:

For Danish exporters of road transport to the UK, it is of paramount importance that the future rules governing driving and rest periods, documentation, vehicle weights and cabotage remain as closely aligned as possible between the EU and the UK going forward. It would entail significant additional costs for Danish exporters in this sector and the economy as such, if national regulation in the EU post-Brexit suddenly began to diverge from current EU-rules.

Offensiv interesse

Services/Temporary posting of staff:

Today, regulation governing temporary service contractors within the EU remain to all extent and purposes within national competence, wherefore most Danish service exporters to the UK like e.g. financial advisers or doctors have had to obtain a work permit as well as an official approval of the quality of their specific service delivery in order to be allowed to operate on the UK market. The concern is now that the relatively light regulatory framework in the UK for EU service providers will be changed and substantially beefed up, thereby increasing the administrative and economic costs for Danish companies to post staff to the UK on a temporary basis. Consequently, it must become a central negotiating priority for the Danish government to obtain – as part of a free trade agreement or as a separate agreement - an understanding with British authorities that UK-regulation on temporary service providers from EU-countries will remain as lean, non-intrusive and business-friendly as possible.

Offensiv interesse

Regulatory alignment

Given the lack of clarity in terms of British views and priorities with regard to regulatory co-operation with EU- and Member State-authorities going forward, it is important that the EU insist on achieving a level of regulatory co-operation with the UK that will allow as much automaticity, mutual recognition and strict timetables for official approvals as possible. One of the crucial benefits of the EU's Internal Market is the principle that a product approved for sale in one Member State

is automatically approved for sale in all other Member States. When the UK likely will diverge from this important concept as part of Brexit, it is essential for the Danish Government to strive for the least possible divergence and a maximalist level of regulatory co-operation across all sectors.

Offensiv interesse

Competition and Competitiveness

It is a vital strategic objective for Danish companies that Brexit will not entail a loss of competitiveness for them vis-à-vis their British competitors, because the UK following Brexit will introduce discriminatory policies or in other ways tip the scales significantly for the benefit of local British companies on the UK market to the detriment of EU companies. This includes general competition rules, state aid rules, public procurement and to some extent regulatory alignment as mentioned above. Across all sectors and commercial areas, the EU must work to ensure a level playing field between EU and UK companies after Brexit.

Med venlig hilsen

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Dansk Erhverv