

As the American Song Goes: “Breaking Up Is Hard to Do”:A Comprehensive Review of Brexit, The Brexit “Deal,” And Europe

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ABSTRACT: This article is a comprehensive “look back” on key players, the issues, and events that first led to Great Britain joining the European Union (then the European Economic Community) in 1973, and which later compelled the British electorate to vote to leave the European Union in 2016. The article describes the chronology of events that transpired within the British political system (mainly in the Parliament) that resulted in the resignations of two British Prime Ministers (Cameron and May) and the ascendancy to power of Boris Johnson. The article concludes with a detailed analysis of “the deal” that was finally agreed to at the very end of 2020 and offers a “look forward” with some commentary about the future for Great Britain as it proceeds outside of the formal European Union system.

KEYWORDS: Brexit, immigration, level playing field, sovereignty, withdrawal agreement

I. INTRODUCTION

The European Union or EU is a political and economic union of 28 countries that trade with each other and which allows citizens of any EU nation to move freely between the countries in order to live and work. The EU is a “single market” in which imports and exports between member states are exempt from tariffs and are not subject other non-tariff barriers (Lozada & Hunter, 2014). Services, including financial services, can also be offered without restriction across the continent under EU rules.

II. AN HISTORICAL REVIEW (adapted from History Extra, 2020)

In 1973, after more than 10 years of continuing negotiations, the UK joined the European Economic Community (EEC) – also known as the Common Market (see Coricelli, 2015). The *Daily Mail* aptly described the EEC as “a free association of nations drawn together by a common will to bury the sword” (reported in History Extra, 2020). The UK joined the founding members of Belgium, France, Italy, Luxembourg, the Netherlands, and West Germany on January 1, 1973 along with Denmark and the Republic of Ireland.



Photo 1: January 1973: Londoners reading the newspapers headlining Britain's entry into the Common Market.

The EEC was created in 1957 to eliminate trade barriers and allow a common trade policy across its member states” (History Extra, 2020). There was also a clear political motivation: The EEC was also intended to eliminate the tensions that had led to the calamity of World War II and to avoid any further war on the European continent (see Di Nolfo, 1992). The UK had initially declined to join the EEC, “but, when it became apparent that members of the EEC were enjoying greater prosperity in the post-war years,” the UK changed its position and sought membership (see Ludlow, 1997). In fact, the UK had applied twice to join before in the 1960s before the UK gained membership under Prime Minister Edward Heath in 1973. Steinnes (2008, p. 61) noted that: “In mid-July 1961, the Conservative government in Britain, headed by Harold Macmillan, decided to apply for full membership of the European Economic Community (EEC). Successive British governments had persistently opted for intergovernmental co-operation instead of supranational integration as in the case of the European Coal and Steel Community (ECSC) and the EEC. Thus the application, which implied the intent to join a supranational structure and a customs union, marked an unexpected and somewhat surprising break with the well-established British post-war policy.”

However, both earlier attempts had been vetoed by French President Charles De Gaulle. De Gaulle objected to British membership on grounds that the “special relationship” between the United States and Great Britain meant that the UK “relied too heavily on the US,” to the detriment of the European continent (Davis, 1998; Moravcsik, 2006).

One year after the UK joined, Heath’s Conservative government was replaced by a Labour government, as Harold Wilson became Prime Minister. The Labour party was divided over the UK’s membership in the EEC and wanted the terms of British membership renegotiated. As a result, on June 5, 1975, the UK held a referendum on British membership in the EEC. British voters responded resoundingly, as more than two-thirds of the votes were cast on the “remaining” side.

The *Maastricht Treaty*, signed in 1992, renamed the EEC as the European Community (EC), which by then had risen to 12 member states with the inclusion of Greece, Spain, and Portugal. The name *European Community* would reflect that it was designed to encompass a wider range of issues than economic policy (Baun, 1995-1996). The *Maastricht Treaty* also founded the European Union (EU) into which the EC countries were incorporated. The EU would grow to 28 states with a single currency, the euro, eventually adopted by 19 of the member states (Potts, 1997).

III. GROWING BRITISH DISCONTENT WITH MEMBERSHIP IN THE EU

Over the years, however, discontent with membership in the EU, marked by doses of populism, misinformation, and “Euroskepticism,” began to develop (see Hooghe & Marks, 2007). The issue would be resolved through a vote by the British people. Arguments presented during the referendum campaign and afterwards related to legal and political issues (Heydarli, 2019), economic considerations (Chang, 2018), and perhaps more importantly, question surrounding the UK’s national identity and sovereignty (Brown, 2017).

Laitinen, Troitino, and Kerikmae (2020, p. 103) wrote that “Brexit ought to be viewed as a rational outcome of a long historical process, where Britain’s opposition to further integration anywhere other than the single market, its strong national identity characterized by exceptionalism, and the backlash against globalization, have shaped European integration since Churchill.” The stakes were clear: “Figures from the early 2000s suggest around three million jobs are linked to trade with the European Union.” Important questions would be raised by both proponents and opponents.

Would the UK’s status as one of the world’s biggest financial centers be diminished if London were no longer seen as a “gateway” to the EU for major international banking interests? Peterson (2018, p. 72) stated: “... Commentators questioned whether London would be able to maintain its title as the financial capital of Europe. Although historically the epicenter of financial services, the uncertain consequences of Brexit have made firms, financial institutions, and individuals question possible continental alternatives” (see Clarence-Smith, 2017; Sowels, 2017). Would financial firms based in the UK lose so-called “passporting” rights to work freely across the continent?

In determining whether the financial advantages of EU membership, such as free trade and inward investment, outweighed the costs and other considerations (see Steininger & Feibermayr, 2017; Kotlinski, 2018), the recitation of certain facts might be helpful:

- The UK was clearly a “contributing nation” to the EU. In 2016, the year of the referendum, the UK paid in £13.1bn (approximately \$17.89 billion), but it also received £4.5bn (approximately \$6.15 billion) in EU spending.
- It is also important to note that the UK would be required to pay as much as £39bn (approximately \$53.28 billion) in order to break the partnership. “Breaking up is [indeed] hard to do!”

- *Sky News*(2015) reported that “More than 50% of our exports go to EU countries.” Membership in the EU at least meant that British interests were at least considered in drawing up rules.

The website, *Debating Europe*(2020), underscored the argument in this way:

“Over half of Britain’s trade goes to the EU, bringing the country around £400 billion a year. That eclipses any savings from not contributing to the EU budget. Over one-in-ten British jobs are directly linked to EU membership and studies show Brexit could wipe up to 10 percent from UK GDP. International companies invest in Britain because it’s a gateway to the EU’s 500 million consumers. Even if a post-Brexit UK persuaded former partners to grant it Norway-style access to the EU market, it would have to accept EU rules without any say in shaping them. Enjoy a glass of Chianti or a slice of Camembert? Thinking of retiring to the Algarve or spending a weekend in Amsterdam? All of that could be harder or more expensive if Britain leaves the EU’s free trade zone and new tariffs and controls are introduced. Brits lose the freedom to travel, study, live and work in the other 27 EU countries. That’s bad news for anyone wanting a cheap, hassle-free European holiday, not to mention the over 2 million Brits currently residing elsewhere in the EU.”

Brexiteers, a term used to describe those who favored the “leave side” (see Ruzza&Pejovic, 2019), countered that the UK could compensate for these seeming negatives by negotiating its own individual trade agreements. In fact, Brexiteers argued that because the trading rules of the EU generally benefitted larger UK companies and financial service organizations, many small and medium-sized firms, which concentrated their trading strategies domestically, would be freed of the regulatory burden that had characterized EU membership.

In support of their “leave” position, Brexit campaigners proposed several different models for post-EU trade policy. Prime Minister Johnson favored an arrangement based on the UK’s free trade treaty with Canada. Johnson noted: “I think we can strike a deal as the Canadians have done based on trade and getting rid of tariffs” and have a “very, very bright future” (Mason, 2016). Nigel Farage suggested maintaining even closer economic links with the EU, replicating the positions advanced by Norway or Switzerland (*The Week*, 2020). Others suggested that Britain could cut links with Europe and reinvent itself as a Singapore-style economy, free from EU rules and regulations (Burdeau, 2019).

Publications such as *The Economist*, however, cast doubt as to the practicality of such an approach and noted that “if Britain were to join the Norwegian club, it would remain bound by virtually all EU regulations, including the working-time directive and almost everything dreamed up in Brussels in future” (reported in *The Week*, 2020). Henly and Rankin (2017) argued that “Pursuing trade pacts outside of Europe could mean [a] worse Brexit deal for UK.” Meanwhile Great Britain would no longer have any influence on what EU regulations dictated in terms on internal British trade policies.

3.1 Brexit and British Sovereignty

Interestingly, for many Brexiteers, issues relating to sovereignty were considered of paramount importance. Elliott and Tierney (2019) wrote:

“Membership in the EU has had a monumental impact not only upon the substantive law of the UK, but also upon the development of fundamental constitutional doctrines, principles and practices over more than four decades, affecting our understanding of parliamentary supremacy, the relationship between Parliament and Government, the constitutional authority of the courts and the creation and development of devolve government.”

Pro-Brexit Labor MP Kate Hoey may have summed up the view by stating that the EU was “an attempt to replace the democratic power of the people with a permanent administration in the interests of big business” (quoted by Bernanke, 2016). Many voiced the opinion that membership in EU institutions had “drained power from the UK parliament.” Some Brexiteers who were singularly influenced by the sovereignty argument frequently referred to the Parliament of the EU as “The Mother of All Parliaments” – and not in the same revered sense in as in the traditional description of Westminster (see *Debating Europe*, 2020):

“Britain is the birthplace of modern parliamentary democracy. It is time to free it from the murky decision-making of the EU where the un-elected Commission initiates legislation, national veto rights have been steadily undermined and lack of voter interest has eroded any claims to legitimacy by the European Parliament. Democracy needs a demos – a “people” or citizenry – and the European Union simply does not have that. People in the UK speak a common language and share a common politics, and they are united by bonds of nationhood. Democracy cannot function without those things, and so Britain is better off out.”

“Britain is a great nation with a proud history that has been forced into subservience to the unelected bureaucrats of Brussels. Outside the EU, Britain could resume its place as a powerful

independent power. It is the world’s 5th biggest economy and 5th most potent military force with its own nuclear deterrent. It is a permanent member of the U.N. Security Council. Freed from restraints in Europe, Britain could rebuild ties with natural English-speaking allies in the Commonwealth and strengthen the Special Relationship with the United States. As long as Britain leaves the EU Customs Union and Single Market, then it can forge free trade deals with countries around the world. Economic growth is fastest in the developing world, and Britain will be best-placed to benefit from that growth if it is independent, flexible, and outward-looking.”

Another issue became hotly debated. Britons had become convinced that “faceless and nameless bureaucrats” from Europe were dictating key elements of the British economy. Stated *Debating Europe* (2020):

“Over-regulation by the EU has cost the British economy over £125 billion. Freed from Brussels red tape, the UK economy would thrive like Norway or Switzerland – two of the most successful states in Europe. Britain could negotiate its own trade deals with the likes of China, the United States and Russia on terms tailor-made to suit the national interest. Trade with the EU countries would continue – it will be in their interests to maintain Britain’s access to the European free market. Taxpayers would get an immediate saving of over £20 million a day from Britain not having to pump money into the EU budget. British farmers, fishermen and small businesses would all be free from ruinous Brussels policies. If the UK leaves the EU without a deal, then it will have £39 billion to spend on supporting British companies and industries that trade with Europe, while lowering tariffs and barriers to the rest of the world.”

3.2 Brexit and Immigration

Immigration issues provided a “flash point” in the debate (Dennison & Geddes, 2018). Tilford (2016, p. 1) provided an insight:

“If Britain votes to leave the EU it will be because of hostility to immigration. It will not be because of the threat of eurozone caucusing, the role of national parliaments vis-a-vis the European Parliament, regulatory threats to the City of London or concerns over the competitiveness of the EU economy. Disillusionment with the EU has risen in the UK because membership has become synonymous in many voters’ minds with uncontrolled immigration. Why has immigration, in particular EU immigration, become so toxic an issue in the UK that it could cost the country its membership of the Union?”

The answer to the question posed by Tilford (2016) may lie in an analysis of EU law, under which Britain was not able to prevent a citizen of another member state from coming to live in the UK. As noted in *Debating Europe* (2020):

“Since Poland and the other eastern European nations joined the EU in 2004, migrants have used the Union’s free labour movement rules to flood the UK. Poles are now one of the biggest immigrant groups in Britain. Immigrants arriving in Britain from the EU outnumbered Brits heading the other way by 180,000 in 2016, placing unacceptable strains on housing, welfare and education. Lax border controls in other EU countries already make it easier for illegal migrants and terrorists to get into Britain, despite the UK staying outside Schengen” (see also Burrell, 2016).

The Week (2020) noted: “According to the Office for National Statistics, in 2016 there were 942,000 eastern Europeans, Romanians and Bulgarians working in the UK, along with 791,000 western Europeans and 2.93 million workers from outside the EU. China and India were the biggest source of foreign workers in the UK.”

David Frum (2016) provided insights into the immigration debate from the viewpoint of the Brexiteers:

“The force that turned Britain away from the European Union was the greatest mass migration since perhaps the Anglo-Saxon invasion. 630,000 foreign nationals settled in Britain in the single year 2015. Britain’s population has grown from 57 million in 1990 to 65 million in 2015, despite a native birth rate that’s now below replacement. On Britain’s present course, the population would top 70 million within another decade, half of that growth immigration-driven.

British population growth is not generally perceived to benefit British-born people. Migration stresses schools, hospitals, and above all, housing. The median house price in London already amounts to 12 times the median local salary. Rich migrants outbid British buyers for the best properties; poor migrants are willing to crowd more densely into a dwelling than British-born people are accustomed to tolerating.

“This migration has been driven both by British membership in the European Union and by Britain’s own policy: The flow of immigration to the U.K. is almost exactly evenly divided between EU and non-EU immigration. And more is to come, from both sources: Much of the huge surge of Middle Eastern and North African migrants to continental Europe since 2013 seems certain to arrive in Britain....”

Professor Adrian Favell, formerly of the London School of Economics, summed up the views of the “stay” voters and opined that limiting freedom of movement would deter the “brightest and the best” of the continent from coming to Britain (see, e.g., Favell & Barbulescu, 2018). Brexiteers, meanwhile, countered that Great Britain could tailor its post-Brexit immigration policies to meet discreet technical and sectoral employment needs.

IV. THE CHRONOLOGY OF EVENTS (ADAPTED FROM COWBURN, 2020): A REPRISE LEADING TO THE 2020 DEAL

It was obvious that both sides in the Brexit debate were passionate and could muster strong arguments in support of their positions. As might be expected, events would move quickly. A reprise of events leading to the 2016 referendum through the events of 2020 in finally arriving at a “deal” may be summarized as follows:

4.1 2016

On June 23, 2016, the British electorate would decide a question that had roiled UK politics for more than a generation: Should the United Kingdom remain within the European Union—or “leave,” ending its 40-year membership to “go it alone”?

The movement to “leave Europe” had become known as Brexit. In the end, just under 52% of British voters opted for Brexit, although, as Stevenson and Pepper (2017, p. 5) noted, “The British government, all the major political parties, and nearly every major business had campaigned to remain.” What was the background leading to the 2016 referendum?

Politics has always been a major component of the Brexit debate. In 2015, the victory of the Conservatives (Tories) in the general election triggered a pledge in its election manifesto to hold a referendum on the UK’s membership in the EU. Prime Minister David Cameron had made the promise at a time when he was under intense political pressure from “Eurosceptic” backbenchers and when the Tories were hemorrhaging votes to UKIP or the United Kingdom Independence Party, a populist political party that forcefully advocated for Britain’s separation from the European Union. Bale (2018) notes that “The UK Independence Party (UKIP) is not so much a populist party that became Eurosceptic as a Eurosceptic party that became populist. However, careful tracing of a sequence that began in the late 1990s reveals that it was not UKIP but the Conservative Party that first fused populism with Euroscepticism.” Its influence peaked under the leadership of Nigel Farage (Ewen, 2016). Farage became the most visible face in the ‘Leave’ campaign—literally becoming “Mr. Brexit” (D’Arcy, 2019). He later broke with UKIP in 2018 and formed the Brexit Party.

Having called for the national referendum, Cameron nevertheless vowed to campaign with his “heart and soul” to keep Britain in the European Union. At the same time, several members of his cabinet campaigned on the “leave” side (Lynch & Whitaker, 2017). To the surprise of many, apparently including Farage, the “leave campaign” won by a margin of 51.9% to 48.1%, with a gap of 1.3 million votes in its favor. In response to the vote, Prime Minister Cameron announced his resignation on the following day. On June 25, UK Commissioner Jonathan Hill likewise announced his intention to resign as well.



Photo 2 Cover Page of The Daily Mirror (left) and The Sun (right), 24 June 2016

Following Prime Minister Cameron’s resignation, which took effect on July 13, 2016, an intensely personal Conservative Party leadership battle saw Michael Gove and Boris Johnson literally destroy each others’ campaigns, which paved the way for former Home Secretary Theresa May to become Prime Minister. On the same day, Prime Minister May created a new cabinet-level position, Secretary of State for Exiting the European Union, to oversee withdrawal negotiations.

The resignation of David Cameron ushered in what may only be termed as one of the most tumultuous premierships in modern history, with the next three years dominated by a single issue: How to extricate the UK from Europe. Writing in *The Washington Post*, Booth, Adam, and Hughes (2019) commented: “Brexit consumed all. It dominated May’s headlines, debates, diplomacy, agenda.” On December 7, 2016, the House of Commons voted 461 to 89 in favor of the Prime Minister’s plan to trigger Article 50 of the Treaty on European Union by the end of March of 2017, which would result in the UK leaving the European Union.

4.2 2017

Ispas and Panc (2017, p. 10) noted that “The new situation created for the Union is a political, legal and economic challenge, with unpredictable and irreversible consequences, but it also represents an impetus to relaunch the European project.” On January 24, 2017, the UK Supreme Court ruled that Parliament was obligated to authorize the triggering of Article 50 (see *On the Application of Miller and another v. Secretary of State for Exiting the European Union*, 2017). In response, on January 26, the Government introduced a bill in Parliament to empower Prime Minister May to initiate Brexit by triggering Article 50.

The bill received the support of opposition Labor Party leader Jeremy Corbyn. After some delay, Prime Minister May invoked EU’s Article 50 in March of 2017 by sending a letter to President of the European Council Donald Tusk, formally beginning the two-year process which would see Great Britain leaving the EU on March 29, 2019.

Article 50 of the *Treaty on European Union*, enacted by the Treaty of Lisbon on 1 December 2009, introduced for the first time a procedure for a member state to withdraw voluntarily from the EU (see Circolo, Hamulak, & Blazo, 2018; Larik, 2020). In fact, as Hillion (2016, p. 1) noted “The Treaty on European Union (TEU) explicitly foresees that a Member State may leave the EU. According to Article 50 TEU, the withdrawal process begins when, having ‘decide[d] to withdraw from the Union in accordance with its own constitutional requirements,’ a member notifies the European Council ‘of its intention.’”

Article 50 Of the Treaty on European Union (TEU) states that:

1. Any Member State may decide to withdraw from the Union in accordance with its own constitutional requirements (see Heydarli, 2019).
2. A Member State which decides to withdraw shall notify the European Council of its intention. In the light of the guidelines provided by the European Council, the Union shall negotiate and conclude an agreement with that State, setting out the arrangements for its withdrawal, taking account of the framework for its future relationship with the Union. That agreement shall be negotiated in accordance with Article 218(3) of the Treaty on the Functioning of the European Union. It shall be concluded on behalf of the Union by the Council [of the European Union], acting by a qualified majority, after obtaining the consent of the European Parliament.
3. The Treaties shall cease to apply to the State in question from the date of entry into force of the withdrawal agreement or, failing that, two years after the notification referred to in paragraph 2, unless the European Council, in agreement with the Member State concerned, unanimously decides to extend this period.
4. For the purposes of paragraphs 2 and 3, the member of the European Council or of the Council representing the withdrawing Member State shall not participate in the discussions of the European Council or Council or in decisions concerning it.

A qualified majority shall be defined in accordance with Article 238(3)(b) of the Treaty on the Functioning of the European Union.

5. If a State which has withdrawn from the Union asks to rejoin, its request shall be subject to the procedure referred to in Article 49.

On April 18, 2017, Prime Minister May announced that a “snap” general election would be called for June 8. The election, however, rather than providing a clear political mandate, resulted in what is known as a “hung parliament” with the Conservative Party maintaining its status as the largest single party in the House of Parliament, but without a parliamentary majority (Syal & Travis, 2017). The Tories only remained in power as a minority government with the support of the Democratic Unionist Party of Northern Ireland. Brexit negotiations begin on June 19, 2017. Prime Minister May spent more than a year negotiating with her European counterparts for a withdrawal agreement.

4.3 2018

2018 can only be characterized as one of uncertainty. The “Chequers plan,” officially known as “*The future relationship between the United Kingdom and the European Union*,” was a “White Paper” based on a three-page cabinet agreement of July 6. The White Paper laid out the outlines of the future relationship between UK and European Union that the Prime Minister sought to achieve in the Brexit negotiations. Reflecting the deep divisions in the Conservative Party, Brexit Secretary David Davis, and Foreign Secretary Boris Johnson resigned on July 9 in opposition to the plan.

On July 12, 2018, Secretary of State for Exiting the European Union (Brexit Secretary), Dominic Raab, who had succeeded Davis, described it as a “detailed proposal for a principled, pragmatic and ambitious future partnership between the UK and the EU.” Raab also stated that “the white paper proposes a free trade area for goods to maintain frictionless trade, supported by a common rulebook and a new facilitated customs arrangement, but only for the rules that are necessary to provide frictionless trade at the border.” The Chequers plan was rejected by the EU on September 21, 2018. Partially in response, the government’s *Brexit Withdrawal Agreement* was published on November 14, 2018. Raab, however, resigned as his position on November 15, and was succeeded by Stephen Barclay, who would focus his attentions on “domestic preparations” rather than negotiations for Brexit, which would now be personally managed by Prime Minister May. On November 15, the twenty-seven member states of the EU endorsed the “Withdrawal Agreement.”

4.4 2019

As a sign of continued turmoil within the British political system, on January 15, 2019, Parliament overwhelmingly rejected the 585-page Withdrawal Agreement by a margin of 432 votes to 202. A further vote on essentially the same agreement on March 12 also saw May suffer a similar defeat by a margin of 391 to 242. On March 14, Parliament agreed to extend the Article 50 period. The Prime Minister requests that the EU extend the Article 50 period until June 30, 2019. In response, the European Council offered to extend the Article 50 period until May 22, but only if Parliament approved the Withdrawal Agreement by March 29. Should Parliament fail in this effort, the UK would have until April 12 to indicate its “way forward.”

March 29, the original end of the Article 50 period, saw the defeat of the agreement again by a vote of 344 to 286. *Was there a way forward?*

The Week (2020) reflected the raw political facts:

“The Tory backbenches loathed it. The Democratic Unionists hated it. The opposition Labour Party opposed it,” says the US newspaper. “Brexiters said it would keep Britain forever shackled to the EU, in vassalage, as Johnson put it. Remainers complained that it would introduce too much economic risk with too little reward.”

As a result of this third defeat in Parliament, Prime Minister May requested for a second time that the EU extend the Article 50 period to June 30, 2019. Just five days later, on April 10, the European Council granted another extension to the Article 50 period to October 31, 2019, or on the first day of the month after that “in which the Withdrawal Agreement is passed, whichever comes first.” The Council further reminded the UK that it was still obligated to hold elections to the European Parliament in May of 2019. In these elections, the Brexit Party (led by Nigel Farage) won 29 seats, but parties advocating a second vote on withdrawal received 55.5% of the vote and secured 37 seats (including anti-Brexit Liberal Democrats who won 16 seats and Labour who won 10 seats). The Conservatives fell to 4 seats, receiving 8.8% of the vote, representing the largest ever defeat for a governing party in a UK-wide election.

On May 24, 2019, Prime Minister May officially announced her resignation, stating that she had “done her best” to deliver Brexit and that it was a matter of “deep regret” that she had not succeeded. Her resignation became official on July 24. The subsequent leadership election saw former foreign secretary Boris Johnson become the new Prime Minister. Johnson had campaigned on the promise to leave the EU on October 31 and, once he became Prime Minister, Johnson insisted that he would rather “die in a ditch” than delay Brexit again.

Behind the scenes machinations took place in the summer and early fall of 2019 until Parliament was recalled on September 25. Events included Johnson’s decision to “prorogue” Parliament in September (meaning that parliament’s sitting is suspended, ending all current legislation under discussion), which was later ruled to be unlawful by the Supreme Court of the United Kingdom). To complicate matters even further, the government had lost its working majority in the Parliament after Tory MP Phillip Lee defected to the Liberal Democrats and 21 Tory MPs (including Nicholas Soames, the grandson of Winston Churchill) were temporarily suspended from party membership [the technical term is that these MPs had their “whips withdrawn”] for defying party orders. These MPs had backed a bill to block what was called a “no-deal” Brexit in which the UK would leave the European Union with no agreement in place relating to the future relationship between the UK and the EU.

Johnson suffered multiple defeats in the House of Commons on September 3 and 4, including the defeat of the Prime Minister’s motion to call an October general election—essentially by a vote of Conservative MP’s alone (298-56), with all Labour MP’s in abstention. After nearly two months of indecision and contradiction, on October 21, 2019, the government introduced “*A Bill to implement, and make other provision in connection with, the agreement between the United Kingdom and the EU under Article 50(2) of the Treaty on the European Union, which sets out the arrangement for the United Kingdom’s withdrawal from the EU.*” Peers (2020), writing in the *Yearbook of European Law*, commented that “The Brexit withdrawal agreement is full of tensions between EU and international law, and mixes together provisions winding down the UK’s membership and continuing the EU/UK relationship—culminating in the confused and incomplete provisions on Northern Ireland.”

On October 22, the “Withdrawal Agreement Bill” finally passed by 329 to 299. Nevertheless, Parliament rejected the Prime Minister’s fast-track timetable for a Halloween deadline, when MPs “rejected by 322-308 votes [Johnson’s] accelerated time table to push the 110-page bill through Parliament within three days” (Miller 2019), Johnson then opted for a pre-Christmas snap general election.

On October 28, Labour backed a Government bill calling for a general election, with opposition leader Jeremy Corbyn insisting that a “no-deal” Brexit must first be “off the table.” On this same date, the European Council agreed to extend the Brexit deadline until January 31, 2020—the third such extension granted. However, the Parliament balked and the government’s motion for a December 12 election failed 299-70, short of the required two-thirds majority required, with most of Labour’s PM once again abstaining. After considerable Parliamentary wrangling (relating to reducing the voting age from 18 to 16 and allowing resident EU nationals to vote were ruled out of order by the Deputy Speaker), MPs finally passed an unamended bill by 438 votes to 20, setting December 12 as the date for the general election. Parliament was subsequently dissolved on November 6.

On December 12, Johnson won an historic election victory—at least partly due to the ineptitude of the opposition Labour Party and the failure of its leader, Jeremy Corbyn, to convince Britons that he would be a suitable Prime Minister—with a majority of 80—securing the largest majority for a Conservative Prime Minister since Margaret Thatcher’s 1987 election victory.

In a victory speech the next morning, Johnson reaffirmed that Brexit had been the “irrefutable, irresistible, unarguable decision of the British people,” and vowed that “I will not let you down.” The election of Johnson’s Conservatives now assured that Brexit would be completed. But under what terms?

4.5 2020

On January 22, the “Withdrawal Agreement Bill” proposed by the Prime Minister was passed by the Parliament by a vote of 342-254. On January 23, 2020, the EU withdrawal bill received what is known as *Royal Assent* (Hockaday, 2020)—the process by which the Crown formally approves an act of Parliament.

Six days later, the European Parliament overwhelmingly approved the Brexit “divorce” deal by a vote of 621 to 49. This would mark the last time that representatives from the U.K. would sit in the European Parliament. On January 30, the Council of the European Union, based in Brussels, formally approved the deal. At 11pm GMT on January 31, the UK officially left the European Union after 47 years of membership. Transitional arrangements would now begin for the period ending on December 31, 2020 to deal with several contentious issues. Would there be a “deal”?

On February 3, the British government published its objectives for going forward. These objectives included:

- “Respect the sovereignty of both parties and the autonomy of their legal orders;
- No regulatory alignment, nor any jurisdiction of the Court of Justice of the European Union over the UK’s laws, nor any supranational control in any area, including the UK’s borders and immigration policy;
- A suite of agreements of which the main elements would be a comprehensive free trade agreement covering substantially all trade, an agreement on fisheries, and an agreement to cooperate in the area of internal security, together with a number of more technical agreements covering such areas as aviation or civil nuclear cooperation;
- Future cooperation in other areas does not need to be managed through an international Treaty;
- The UK government will be acting also on behalf of the UK Crown Dependencies and Overseas Territories: the whole UK family;
- The UK proposes to agree with similar arrangements with the EFTA (European Free Trade Association) states;
- A free trade agreement between the UK and EU should reflect, and develop where necessary, existing international best practices as set out, inter alia, in FTAs (Free Trade Agreements) already agreed by the EU.”

On March 18, the EU published its draft proposal for a “*New Partnership with the UK*,” which would reconcile the views of the European Union with the principles found in the Withdrawal Agreement. Articles 1, 3, and 4 are of special relevance:

Article 1: Purpose

1. This Agreement establishes a comprehensive partnership between the Parties.
2. The aim of this partnership is to maintain, between the Union and the United Kingdom, an area of prosperity and good neighbourliness, founded on common values and characterised by close and peaceful relations based on cooperation.

Article 3: Good faith

1. The Parties shall, in full mutual respect and good faith, assist each other in carrying out tasks that flow from this Agreement and any supplementing agreement.
2. They shall take all appropriate measures, whether general or particular, to ensure fulfillment of the obligations arising from this Agreement and any supplementing agreement and shall refrain from any measures which could jeopardise the attainment of the objectives of this Agreement and any supplementing agreement.

Article 4: Democracy, rule of law and human rights

1. The Parties shall continue to uphold the shared values and principles of democracy, the rule of law, respect for human rights, which underpin their domestic and international policies. In this regard, the Parties reaffirm their respect for the Universal Declaration of Human Rights and the international human rights treaties to which they are parties, as well as their continued commitment to respect the European Convention on Human Rights and Protocols 1, 6 and 13 thereto.
2. The Parties shall promote such shared values and principles in international fora. The Parties shall cooperate and coordinate in promoting those values and principles, including with or in third countries.

V. NOW, THE “HARD PART”: TRANSLATING THE “NEW PARTNERSHIP” INTO REALITY

The UK then entered an 11-month transition period in which to negotiate its future relationship with the European Union on a variety of specific issues, which was scheduled to end—barring any further extension—on December 31, 2020. Would there be a “Deal” or a “No Deal” Brexit?

Johnson remained adamant about sticking to the timetable. Britain’s top negotiator, David Frost, insisted bluntly: “We will not ask to extend [the negotiations]. If the EU asks we will say no.” In September, Johnson announced that the UK was entering the “final phase” of negotiations, and informed the EU that a free trade deal must be concluded by October 15, otherwise the UK will “move on.” No one—perhaps not even the Prime Minister—could articulate what that might mean.

Meanwhile, in order to provide *some* certainty, the Prime Minister introduced the *internal markets bill*, intended to protect barrier-free trade between the four home nations of England, Scotland, Wales, and Northern Ireland (Culbertson, 2020). Some commentators believed the bill was a “negotiating gambit,” but the EU refused to back down, launching legal action while simultaneously vowing to continue negotiating in the hope of a breakthrough.

VI. THE “DEAL”

Four and a half years after British voters elected to leave the EU, and mere days before the latest and presumably final deadline, UK and EU leaders announced a trade deal defining the terms of the breakup (Langfitt, 2020). Matthjis (2020), writing for the Council on Foreign Relations, notes:

“The EU-UK Trade and Cooperation Agreement was negotiated in nine months—much faster than the typical trade deal—and respects the major red lines of both parties. The EU avoids a hard border on the island of Ireland and preserved the ‘four freedoms’ of its cherished single market: free movement of goods, services, capital and people. The UK achieves ‘zero tariff, zero quota’ goods trade with its main trading partner and avoids any role for the European Court of Justice in settling disputes. On fisheries, the EU agreed to give up 25 percent of its existing quotas in UK waters over a transition period of five and a half years, after which there will be annual negotiations.”

Bloomberg News (2020) has undertaken an expensive analysis of the main points of the agreement and offered a cautionary note: “U.K. Prime Minister Boris Johnson’s post-Brexit trade deal is unique in that it will leave businesses facing more barriers to trade than they did while Britain was a member of the European Union.” The main points may be summarized as follows:

Trade in Goods: The agreement ensures that most goods traded between the EU and UK will not be subject to additional tariffs or quotas imposed by the EU. However, it is also possible that British exporters will face EU regulatory hurdles that will make it more costly and burdensome to do business in Europe.

The deal includes a re-balancing mechanism: "Either side will be able to retaliate with tariffs if they diverge too much." The parties announced that "Such measures shall be restricted with respect to their scope and duration to what is strictly necessary and proportionate in order to remedy the situation." Any retaliatory measures will also be subject to arbitration by an independent panel – and not the European Court of Justice.

Rules of origin: Reflecting unique difficulties with resolving this issue, MacLennan and Vermeeren (2020) report that "Business organizations and the European Parliament are calling strongly for an extension of the Transition Period to take account of ... special circumstances." UK firms will be required to certify the origin of their exports in order to qualify for tariff-free access to the EU. The agreement contains limitations relating to what proportion of goods that can be assembled from parts made outside of the UK which would qualify for tariff-free access.

Any parts produced by EU countries will automatically count as "local content." The agreement provides for special restrictions. Gasoline or diesel vehicles will need to be made with at least 55% local content to escape tariffs. Electric and hybrid vehicles will be allowed to contain 60% overseas content—but that will fall to 55% by 2026. Batteries will be allowed to contain 70% international content, but that will drop over the same period of time to 50%.

In the absence of a final "mutual recognition agreement," regulatory bodies within the UK will not be able to certify products for sale in the EU, setting up a potentially major barrier to trade.

Financial Services: The agreement provides no definitive decision on the issue of "equivalence," which would allow firms from the UK to sell their services into the EU's single market without restrictions. The agreement doesn't include commitments on market access for UK financial services.

The UK and EU, however, are committed to moving forward on specific equivalence decisions. The European Commission, which is responsible for promulgating rules providing for access to the EU's market, announced that it will require more information from the UK, and that it does not plan to adopt any additional equivalence decisions at this time.

However, both the UK and the Commission issued a joint declaration to support enhanced cooperation on financial oversight. The parties stated that they hoped to agree on a *Memorandum of Understanding* by March of 2021.

Level Playing Field: Negotiators from both the UK and the EU committed to upholding their individual standards relating to "environmental, social, labor and tax transparency" to assure that the standards do not undercut or undermine each other (see Morris, 2020). At the same time, Morris (2020) asks: "How closely aligned with the EU's economic structures will the UK be in the future?"

Subsidies: Both the UK and the EU will be prevented from providing an unlimited state guarantee to cover a failing company's debts or liabilities. In line with EU law dealing with subsidization, the UK will not be permitted to essentially rescue a failing firm without a restructuring plan. White (2020) notes that:

"State aid has become a key sticking point in the UK's protracted talks on shaping its future relationship with the European Union, which tightly controls state subsidies within its borders. With additional pressure from the pandemic forcing governments to mount huge rescue efforts for their economies, the fragile set of rules that aim to keep state support in check is under threat."

In addition, any state aid offered to a failing bank will have to be the minimum necessary to help it wind down. The UK and the EU will have to disclose any subsidies they may award in the future.

Both the UK and the European Commission issued a joint declaration to support enhanced cooperation on financial oversight. The parties stated that they hoped to agree on a *Memorandum of Understanding* by March of 2021.

Dispute Settlement: Any disputes arising from the deal must be negotiated between the EU and the UK and will be subject to arbitration by an independent panel, with no role for the EU courts (Fella, 2020). As Cross (2017) stated: "An independent dispute resolution mechanism will be a key part of the UK's 'deep and special partnership' with the EU even after 2019." The Institute for Government (2020) reports:

"The UK and the EU have implemented the Withdrawal Agreement which set out the terms of the UK's exit. Disputes arising under the agreement are to be resolved in the first place by consultations in

the UK–EU joint committee. If those consultations are unsuccessful after three months, the dispute goes to an arbitration panel.”

“The UK and EU must each nominate 10 legal experts to form the ‘pool’ of potential panelists. They must jointly nominate five legal experts to serve as potential chairs. When a dispute arises, the UK and EU each select two panelists from the pool. Those four panelists then elect a chair from that pool. The parties must comply with the panel’s ruling within a reasonable period of time. If the offending party fails to do so, it can be required to pay a financial penalty or to suffer the suspension of some other part of the agreement.”

“The ECJ retains its exclusive jurisdiction over issues of EU law. If a dispute arises concerning an issue of EU law, the panel is required to submit it to the ECJ for interpretation.”

Fishing Rules: Not altogether unsurprisingly, questions relating to fishing and control of British fishing grounds were some of the most contentious areas in the negotiations (Morris & Barnes, 2020; Warren & Wishart, 2020). UK fleets will be able to take 25% of the current EU catch in British waters, worth 146 million pounds (\$198 million), phased in over five years. Because Britain’s opening negotiating position called for an 80% increase, the final agreement represented a significant compromise. The agreement called for a transition period of five-and-a-half years during which reciprocal access rights to each other’s waters would remain unchanged. After that point, British officials stressed that the UK will be in full control of its own territorial waters—but the EU would be able to impose tariffs on fish entering into the EU if its access to British waters was limited by actions undertaken by the British parliament. The agreement has already been subjected to harsh criticism by Scottish First Minister Nicola Sturgeon, who stated that “promises made to the country’s fishing sector had been ‘broken’” (Bussey, 2020). On the other hand, Weston (2020) reported that “the deal could help create jobs for [Northern Ireland’s] fishing industry.”

Customs: The UK’s exit from the European single market on January 1 would inevitably lead to increased bureaucratic regulations from both sides whether the parties had been able to reach an agreement. Now that Britain is no longer a part of the EU, the agreement in principle commits the EU and Britain to follow “international practices and norms” aimed at minimizing regulatory costs for businesses doing business transnationally. To this aim, both the EU and their British counterparts pledged to limit unnecessary customs bureaucracy will initiate “trusted-trader programs” (see Owen, Shephard, & Stojanovic, 2020). The EU has pledged that there will be specific “facilitation arrangements” for wine, as well as organic, automotive, pharmaceutical and chemical products.

Aviation and Trucking: The agreement did not grant automatic recognition to British aerospace designs and products in the EU. Such recognition will be confined to accepting “minor changes” until the EU “gains confidence in the U.K.’s capability for overseeing design certification.” In relation to trucking, Longley (2020) had noted that “Europe’s largest truck owner warned it could turn away deliveries to the U.K. if Brexit triggers chaos at the border, a move that could threaten supermarkets’ supplies of fresh product.” Faced with the real prospect of “queues at the border that could stretch as far as 50 kilometers (231 miles),” both sides commit to “good and efficient management of visa and border arrangements for road haulers, in particular across the U.K.-Union border” and to “appropriately facilitate the entry and stay of truckers.”

Data Flows: The deal includes a temporary solution or “bridge period” to keep data flowing between the EU and U.K. until the bloc has adopted a comprehensive “data adequacy” agreement.

This bridge period starts on the date the new deal takes effect and will last a maximum of six months, or will end as soon as a data adequacy agreement has been finalized, which is expected to occur early in 2021. Personal data shipped to the UK during this interim period “shall not be considered as transfer to a third country” under the provisions of the *General Data Protection Regulation* or GDPR (see Wessing, 2020; Kon & Cumbley, 2020; EU 2016/679). The UK will suspend its own transfer mechanism. Both the UK and EU representatives committed to upholding high levels of protections of data protection and to ensure “cross-border data flows to facilitate trade in the digital economy” without imposing limits on where data can be stored or processed.

Energy: The UK will not have access to the EU’s internal energy market. New arrangements will be in place by April 2022 to assure that energy trading is smooth and efficient on interconnectors—huge power cables that run between the UK and Europe.

This area is especially important for the UK which is a net importer of electricity. The UK gets 8% of its power from Europe, and many analysts predict that “UK electricity bills could eventually soar due to Brexit” (Riaz, 2020). Making trading in energy “smooth and efficient” will “benefit U.K. consumers and help integrate renewables and other clean technologies onto the grid in line with our domestic commitment to net zero emissions.” The deal includes guarantees on security of energy supply. Because the UK will no longer be a part of the EU’s emissions trading system, both sides have agreed to cooperate on carbon pricing in the future and “consider linking their respective systems.” The agreement would be suspended if either side breaches their commitments to the 2015 *Paris*

Agreement on climate, to which the UK is a signatory nation. The development of sustainable energy sources will no doubt become an important policy perspective (Leal-Arcas, Kanakasis, & Fearnley, 2020).

Professional Services: The deal means that there will no longer be automatic mutual recognition of professional qualifications as there is throughout the EU (see Rodgers, 2016; Jacobsson, 2020). The agreement provides that “Doctors, nurses, dentists, pharmacists, vets, engineers or architects must have their qualifications recognized in each member state they wish to practice in.” The deal will have a major impact on Britain’s legal profession, as well (Miller, 2020). This part of the agreement is a loss for the UK, which had asked for “comprehensive coverage” to ensure there were no “unnecessary” barriers to regulated services.

Business Travel: The UK and EU agreed that *short-term* business visitors will not be required to hold work permits or undergo economic needs tests. “Managers and specialists” will be allowed to stay for up to three years and trainees for up to a year. People visiting to set up businesses will be permitted to remain for as long as 90 days during any six-month period, according to the deal (seeTravelPerk.com, 2018).

Taxation: According to the UK, “There are no provisions constraining our domestic tax regime or tax rates.” Both the UK and representatives of the EU pledged to “uphold global standards on tax transparency and fighting tax avoidance” (see KPMG, 2020; Saccardo, forthcoming, 2021)

Agriculture: Trade of agricultural products will benefit from the zero-tariff, and zero-quota terms of the agreement. But the lack of an equivalence agreement on phytosanitary rules means shippers may face new hurdles at the border. According to the website of EU Commission (2020):

“Sanitary and phytosanitary (SPS) measures are measures to protect humans, animals, and plants from diseases, pests, or contaminants. The European Union’s legislation lays down a detailed set of these rules to reduce or eliminate the possible risks of animal, plant and public health threats as well as animal and plant diseases being introduced into the EU by goods coming from non-EU countries. The legislation also foresees rules for co-operation between relevant competent authorities and customs services as well as provisions on targeting controls of goods based on the risks they represent.”

The issue of agricultural tariffs is of great importance to both sides. An agreement relating to tariffs is “especially important” for the agriculture and fishing sectors, as some meat and dairy products would have faced taxes topping 40% under WTO terms, according to the EU. However, there will be certain “extra checks”: UK agri-food consignments must be accompanied by health certificates and undergo sanitary and phytosanitary controls at member states’ border inspection posts. However, both sides will be able to maintain their own sanitary standards going forward. Interestingly, food and agri-products entering Northern Ireland from Great Britain will be subject to checks and phytosanitary controls.

Law Enforcement: Prior to the announcement of the deal, Tashea (2019) had noted, “With the focus of Brexit’s impact on trade, tariffs, and immigration, criminal justice has taken a notable backseat. In an era where crime happens, increasingly, across national boundaries, international cooperation has become a cornerstone to criminal investigations.” Davies (2020) added: “Only criminals stood to gain from no-deal.” The deal will allow cooperation between the UK and EU in two important areas: *terrorism and serious crime*, and will involve the automated exchange of DNA, fingerprint, vehicle registration, and airline passenger information, “subject to safeguards on the use and storage of the information” (Davies, 2020). Although there will be continued cooperation between UK and EU law-enforcement agencies, the UK will lose its membership in Europol and Eurojust. Extradition.

VII. CONCLUDING COMMENTS

As noted by Kerley (2020), “Many aspects of the UK and the European Union’s future relationship remain uncertain—but we already know some things will change from 1 January 2021.” Taylor (2021), writing for *The Washington Post*, raises an interesting point: “Is it actually over?” It is certainly true that Brexit was finally accomplished, providing a victory for Prime Minister Johnson. However, several unresolved issues still loom (Taylor, 2020):

One major change attenuated by Brexit will occur relating to immigration, which was a major “flashpoint” energizing the Brexiteers. A new UK immigration system will become operative from January of 2021. It will involve a new *points-based system* for foreign citizens (except Irish nationals) wanting to move to the UK. The government insists that it will treat both EU and non-EU citizens equally, but will aim at attracting people who can “contribute to the UK economy” (see Gov.UK, 2020; Paget, 2020)

Under the new system, people wishing to move to the UK to work, live, or study will have to apply, and pay for, a special visa. The visa will cost £348 (approximately \$474) to apply for a student visa from outside the UK, or £475 (approximately \$647) for a student who wishes to extend or switch a visa from inside the UK.

Applying for a visa for a skilled worker will cost between £610 and £1,408 per person (approximately \$831 to \$1917), unless an applicant can demonstrate that he or she has skills that the UK is lacking through the employment of British citizens. Applicants will be required to pay a health surcharge of £624 per person (approximately \$850) per year, unless they are healthcare workers, to augment the national health insurance system.

Citizens of the EU or the EEA (composed of the states of the European Union together with Iceland, Norway, and Liechtenstein) and Swiss citizens won't require a visa for tourist visits to the UK for stays up to six months.

Trade will certainly be different, both inside and outside the UK. In relation to England, Wales and Scotland, importers and exporters from outside the US will need to make customs declarations as if they were dealing with countries elsewhere in the world. Some products, including plants, live animals and some foods, will also need special licenses and certificates. Others will require specific labeling. However, in response to the Covid crisis, the government of the UK has chosen to delay by six months the imposition of full controls on goods entering Great Britain from the EU, although checks for certain controlled substances will continue.

Issues relating to borders will also require special attention. Northern Ireland presents a special case (see Edgington, 2020). The UK and EU have agreed to keep an all-but-invisible border, without checkpoints, between Northern Ireland and the Republic of Ireland, which remains in the EU. Northern Ireland will continue to follow many of the EU's rules, meaning that trucks (lorries) can continue to drive across the border without having to be inspected.

However, some new checks will be implemented on certain goods arriving into Northern Ireland from the rest of the UK (England, Scotland, and Wales) instead. Food products—such as meat, fish, and eggs—will be checked to ensure they comply with EU standards. However, in order to reduce any potential disruption in the supply of necessary foodstuffs, supermarkets will be granted an initial three-month "grace period" where the rules will not be enforced on the food brought into Northern Ireland. Certain meat products (such as sausages) will have a longer six-month grace period.

What will happen after this period is unclear, and will be the subject of future negotiations. Of note, the Irish government has reached out to students in Northern Ireland, offering funding for the *Erasmus Program*, allowing students to spend a year studying in another EU nation (Peltier, 2020).

In terms of Scotland, there are several interesting and perhaps unintended consequences (Brooks, 2020). Brexit may have significantly changed the nature of support for Scottish independence, since 62% of Scottish voters expressed their desire to remain in the EU in 2016 (see Morrice, 2020). Stated Ian Bickford, Scotland National Party representative for the Isle of Skye, “Scotland’s story is European. And that story does not end today” (quoted in Taylor, 2021). The question remains whether the conclusion of a post-Brexit trade and security deal will shift voter sentiment further towards independence. As Brooks (2020) wrote: "the only way to escape the disaster of Brexit is to leave the UK at the earliest opportunity."

Since 2016, an increase in support for independence has occurred among both “remain” and “leave” voters, and support for independence has reached as high as 58% in the polls. One of the reasons may be the belief that Scotland’s fishing fleets may face cuts to valuable catches such as cod and haddock under the deal negotiated by the UK (Bussey, 2020). A second factor may be that the Scottish Government has indicated GDP could be reduced by about 6.1%, compared to staying in the EU, with a bleeding of jobs to the Republic of Ireland as well.

The first test of who is “winning the battle” over the future of Scotland may occur in the May Scottish parliament elections, where the Scottish National Party (SNP) is poised to win a majority. One recent wrinkle, however, may be seen in the possibility that the government in London may be offering £1500 (approximately \$2038) to each Scottish citizen in Covid relief.

Another issue has largely escaped public attention is that of Gibraltar. The deal prevents the immediate imposition of a hard border between Spain and Gibraltar has been under British control since the 1713 *Treaty of Utrecht* but raises “longer-term questions about British sovereignty over Gibraltar,” which is home to about 32,000 people who largely consider themselves as British. As reported by Kassam and Boffey (2020): “A last minute deal between the UK and Spain—agreed just hours before Gibraltar was poised to become the only frontier marked by a hard Brexit—will allow for free movement between the British overseas territory and much of the EU.”

Finally, there is a larger question: Was the “breakup” necessary or even, in retrospect, a sound practical or policy decision? McGee (2020) reported that many in Britain were having serious “second” or perhaps even “third” thoughts. “Four years from the UK’s Brexit vote, a majority of British voters would now opt to remain inside the European Union, says new research.”

“According to the European Social Survey (ESS), a pan-European poll carried out every two years, 56.8% of respondents in the UK indicated that they would vote to remain inside the bloc, an

increase from 49.9% the last time the survey was published in 2018. The most recent survey shows that of those questioned in the UK, 34.9% said they would vote to leave and 8.3% said they would not vote at all” (McGee. 2020).

Taylor (2021) comments that “The Brexit deal has clauses for reviewing trade terms after five years — a timing that would bring the negotiations roughly in line with the next British election — so the terms of Britain’s relationship with the E.U. are likely to remain a political issue for some time.”

In the United States, it is not uncommon at all for persons who became divorced to remarry their original partners (see Fraser, 2019). Could Great Britain rescind their declaration of withdrawal? (see, e.g., Dammann, 2017; Thompson, 2019). We will have to wait to see! Again, as the song says” Breaking up is hard to do,” but it may be that “Instead of breaking up I wish we were making up again.”

Only time will tell.

ACKNOWLEDGEMENT

The authors thank the Stillman School Institute for International Business at Seton Hall University for its support of this project.

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