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ALDONA ZAWOJSKA

Warsaw University of Life Sciences – SGGW, Poland

BREXIT IMPLICATIONS FOR AGRI-FOOD TRADE BETWEEN POLAND AND THE UK

Key words: agri-food sector, foreign trade, the EU, Brexit, the UK, Poland

ABSTRACT. The article is a contribution to the discussion on the anticipated consequences of the United Kingdom's withdrawal from the European Union for Poland's trade relations with this country, with particular emphasis on the likely impacts of a hard or no-deal Brexit on Polish exporters. Its aim is to provide readers with an understanding of how agri-food flows between Poland and the UK (especially Poland's exports) could be affected once the UK departs the EU. The question is important considering that, in recent years, the UK has been the second biggest importer and a net importer of agricultural and food products from Poland. The study is based on trade data from the UN Comtrade Database and Poland's Central Statistical Office, and on tariff data from the UK's Department for International Trade. Taking into account the possible imposition of customs duties announced thus far by the British government on the import of agri-food products from third countries in the event of a no-trade agreement with the EU, the introduction of additional non-tariff barriers, as well as increased transactional (friction) costs and complexity of doing business with foreign partners, a hard Brexit would have serious implications for Poland's fast growing agri-food exports to the UK. It would even lead to a collapse of some Polish supplies, particularly of meat and dairy commodities, to Great Britain. The loss of two-way preferences in trade now arising from participation in the EU single market will undermine the competitiveness of Polish producers on UK's market both against British producers and lower cost exporters from outside the EU.

INTRODUCTION

The neologism 'Brexit' (a blend of British and exit), coined in 2012, expresses the United Kingdom's (UK) withdrawal from the European Union (EU) which will shape the future of the country's relationship with its largest trade partner – the group of the 27 remaining member states, including Poland. Brexit is an outcome of a referendum which was held (on 23 June 2016) across the UK and Gibraltar about whether or not the UK should remain a member of the EU. The majority (17.41 million people; 51.9% of all voters) voted to leave the EU while 16.14 million people (48.1% of all voters) voted to remain in the EU [The Electoral Commission 2016]. The UK was originally scheduled to depart the EU on March 29, 2019, after 46 years of economic integration with the bloc. But, at the time of this paper's finalization (August 2019), the UK still remained an EU

member state since the British Parliament did not ratify the EU departure agreement¹ by the ultimate deadline (April 12, 2019) and was unable to finally decide on any option of Britain's split from the EU. The European Council decided (on 11 April 2019), in agreement with the UK, to further extend the two-year period provided for by article 50(3) of the Treaty on the EU, until 31 October 2019 at the latest. It means that the UK is expected to leave the EU on 1 November 2019 at 00:00 (CET).

The literature [Dhingra et al. 2016, Hubbard 2019, Irwin 2015, McCullagh 2017, PWC 2016, Swinbank 2018, Wieczorek 2017, Wusheng et al. 2017, Van Berkum et al. 2016] lists various post-Brexit scenarios for future economic relations between the UK and the EU, with different consequences for mutual trade flows: (1) the Norwegian model – joining the European Economic Area (EEA) by the UK and obtaining access to the EU single market, (2) the Swiss model – joining the European Free Trade Association (EFTA) and entering relations governed by bilateral agreements, (3) the Canadian model – free trade agreements with individual countries, (4) the Turkish model – joining the Customs Union, (5) trading on terms set out by World Trade Organization (WTO) rules² (a 'hard' Brexit). In the event of a 'no-deal' or hard withdrawal, EU international agreements will no longer apply to the UK.

Although it is uncertain what the UK's future will look like outside the EU, the aim of this paper is to provide readers with an understanding of how agri-food trade between Poland and the UK (especially Poland's exports destined to UK markets) could be affected upon the UK leaving the EU.

RESEARCH METHODS AND DATA SOURCES

This article is a contribution to the discussion on the likely impact of Brexit on agri-food trade relations between the UK and Poland after 31 October 2019. The following research questions were formulated: (1) How important is the UK for Poland as the trading partner country?, (2) How would UK's withdrawal from the EU affect bilateral trade in agri-food commodities between both countries, mainly Polish exports?

According to the Gravity Model of international trade proposed by Jan Tinbergen (the recipient of the 1969 Nobel Memorial Prize in Economic Sciences), the trade flow between any pair of countries is expected to increase as economic size (GDP) grows, and decrease with rising costs of trade between them caused by transport costs, import tariffs and other trade barriers [Tinbergen 1962].

The empirical work presented in this article is based on statistical data concerning the monetary value of imports and exports compiled by the UN Comtrade Database and Poland's Central Statistical Office – CSO (GUS in Polish), as well as statistical data about GDP from the World Bank database. Other sources of information include: the UK Government (the Department for International Trade and the Department for Environmental, Food & Rural Affairs), the Polish Government (the Ministry of Finance), and scientific and gray literature.

¹ The "divorce" agreement keeps customs and trade arrangements of the UK with the EU until at least the end of 2020.

² General Agreement on Tariffs and Trade (GATT), and the General Agreement on Trade in Services (GATS).

RESEARCH RESULTS

THE IMPORTANCE OF POLAND'S AGRI-FOOD TRADE WITH THE UK

Looking at overall bilateral trade in goods between the two countries, it does not seem, at first glance, particularly significant. In 2013-2017, the share of exports to the UK in Poland's total merchandise exports was relatively low, on average around 6.5%. The contribution of imports from the UK to total Polish imports was even lower – about 2.6%. Nevertheless, the UK should be considered a major trading partner because, in 2015-2017, it was the second (after Germany) main recipient of Polish goods³. It is particularly worthwhile noting that Poland has enjoyed a positive trade balance with the UK for years. This surplus amounted to ca 7.4 billion euro in 2014 and 8.3 billion euro in 2017 [GUS 2014, 2018]. According to the CSO, Polish exports to the UK (measured in PLN) in 2016 were dominated by (1) machinery, equipment and transport equipment (40.7%), (2) manufactured goods mainly classified by raw material (17.3%), and (3) food and live animals (15.8%).

As trade specifically concerns agricultural and food products exported from Poland, their large part has been supplied to EU markets (ca 81% in 2016). In 2016 the UK was the second biggest importer of these goods (after Germany, followed by the Czech Republic, the Netherlands and Italy). The UK has predominantly been a net importer of most agri-food products from Poland in recent years (Table 1). The British market is a particularly significant Polish export destination for meat and edible meat offal (31.8% of total agri-food exports to the UK in 2017), tobacco (19%), preparations of cereal, flour, starch or milk (13.2%), vegetables (8.6%) and dairy products (7.2%).

In the period from 2013 to 2017, bilateral agri-food trade turnover enlarged by almost 48% in case of Poland's exports (from ca 1.14 to ca 1.68 billion USD) and by 10% in case of its imports (from ca 0.32 to ca 0.35 billion USD). Polish trade surplus successively grew. It improved by 62% to reach 1.33 billion USD in 2017. These tendencies are consistent with Tinbergen's Gravity model; the growing export flows of agri-food products both from Poland to the UK and from the UK to Poland were associated with rising GDP values in real terms for both countries (Table 1).

From a British perspective, Poland is the UK's 8th most important source and 14th most significant market of agri-food products, in terms of value. In 2015-2017, their imports accounted for 15.9% of the UK's total goods imports from Poland with chocolate, poultry meat, beef, veal, cheese and pork as the most notable commodities. Agri-food products amounted to 7.6% of the UK's total export of goods to Poland with whisky (less than 80% alcohol by volume) being the most important commodity [Manning 2019].

In 2017, Poland was the 3rd biggest supplier both of beef (following Ireland and the Netherlands) and processed beef products (following Ireland and Brazil) to the UK market having around a 7% and 10% share, respectively. It was also the 5th largest supplier of pig products (after Denmark, Germany, the Netherlands and Ireland). Their imports from Poland have grown significantly over the past two decades [Market Intelligence 2019].

³ According to data provided by GUS [2018], only once in history dating back to 1928, was the UK the first major importer of commodities from Poland, namely in 1938, contributing then to 18.2% of Poland's exports.

Table 1. Agri-food trade between Poland and the United Kingdom in 2013-2017

HS code/Commodity groups		PL	2013	2014	2015	2016	2017	
		thous. USD						2013 = 100
01	Live animals	Ex	1,212	802	18	0,3	1	0.1
		Im	3,804	7,371	7,402	6,088	3,727	98.0
		B	-2,592	-6,568	-7,384	-6,087	-3,726	143.8
02	Meat and edible meat offal	Ex	403,713	479,713	487,006	467,544	531,573	131.7
		Im	123,603	131,195	108,721	101,051	104,748	84.7
		S	280,110	348,518	378,285	366,493	426,824	152.4
04	Dairy produce	Ex	97,250	99,736	97,131	112,871	121,252	124.7
		B	14,025	10,519	11,112	12,811	14,556	103.8
		S	83,225	89,217	86,019	100,060	106,696	128.2
07	Vegetables	Ex	131,360	134,828	133,289	131,523	145,403	110.7
		Im	4,248	7,979	5,800	5,043	6,299	148.3
		B	127,112	126,849	127,489	126,480	139,104	109.4
08	Fruit and nuts	Ex	67,684	76,903	72,123	66,207	70,738	104.5
		Im	7,371	9,905	14,062	14,638	17,325	235.0
		B	60,313	66,998	58,061	51,569	53,413	88.6
10	Cereal	Ex	30,376	18,157	10,484	9,144	31,955	105.2
		Im	206	133	62	432	48	23.3
		B	30,170	18,024	10,423	8,712	31,906	105.8
11	Products of the milling industry	Ex	13,398	15,039	14,320	14,652	14,026	104.7
		Im	9,054	10,118	7,816	8,953	8,129	89.8
		B	4,344	4,921	6,503	5,699	5,897	135.8
15	Animal or vegetable fat and oil and their cleavage products	Ex	11,286	15,143	23,522	26,222	26,264	232.7
		Im	12,756	24,735	18,746	13,612	16,824	131.9
		B	-1,470	-9,592	4,775	12,610	9,440	197.7
17	Sugars and sugar confectionery	Ex	33,044	33,081	38,033	34,581	41,678	126.1
		Im	5,925	6,948	6,305	7,164	17,448	294.5
		B	27,119	26,133	31,727	27,417	24,230	89.3
19	Preparations of cereal, flour, starch or milk	Ex	123,067	142,500	155,326	210,328	222,903	181.1
		Im	14,853	14,432	13,959	14,791	19,815	133.4
		B	108,214	128,068	141,367	195,537	203,088	187.7
20	Preparations of vegetables, fruit, nuts, other plant parts	Ex	136,926	100,144	82,165	87,311	99,258	72.5
		Im	6,124	6,481	6,927	8,332	7,829	127.8
		B	130,802	93,663	75,238	78,980	91,430	69.9
22	Beverages, spirits and vinegar	Ex	47,862	52,774	62,411	67,658	59,195	123.7
		Im	108,577	78,663	88,220	108,991	125,717	115.8
		B	-60,715	-25,888	-25,809	-41,332	-66,522	109.6
24	Tobacco and manufactured tobacco substitutes	Ex	44,514	55,872	98,943	131,671	319,292	717.3
		Im	9,112	7,682	26,958	32,447	8,713	95.6
		B	35,403	48,190	71,985	99,224	310,579	877.3
Total exports (Ex)			1,141,692	1,224,692	1,274,771	1,359,712	1,683,538	147.5
Total imports(Im)			319,658	316,161	316,090	334,353	351,178	109.9
Trade balance (B)			822,034	908,531	958,681	1,025,359	1,332,360	162.1
Poland's real GDP growth rate [%]			1.392	3.318	3.839	3.063	4.806	115.9
UK's real GDP growth rate [%]			2.052	3.054	2.346	1.936	1.787	109.4

■ 2017/2015

Source: own compilation based on [UN Comtrade Database, World Bank database]

BREXIT IMPACT ON POLAND'S AGRI-FOOD EXPORTS DESTINED TO UK MARKETS

Most of the previous studies on Brexit outcomes assume that the UK will impose external tariffs and physical controls at the border *vis-à-vis* all of the states with which the UK has no free trade agreement. As regards customs duties, in the case of a hard Brexit, WTO rules, in particular the Most-Favoured-Nation (MFN) principle, naturally apply. It means that after a 'no-deal' Brexit both EU-27 member states and the UK would have to charge each other the same tariff rate they would charge against all other WTO members (*inter alia* against China) – except for developing countries and those that have free trade agreements [see for example Felbermayr 2019].

It was assumed that both the EU-27 and the UK would apply tariffs previously notified to the WTO as the EU's Common External Tariff (CET) on trade with third countries. It is worth pointing out here that the EU has one of the most protected agricultural sectors among WTO members. For example, beef imports above quota into the EU are subject to an '*ad valorem*' tariff of 12.8% plus a specific tariff (an additional fixed amount). As shown in table 2 (effective *ad valorem* rate), some tariffs are very high – they could account for well over 100% of the price per unit. The UK would be obliged, under WTO rules, to impose MFN average import tariffs of 22% on food, 54% on dairy products, and 68% on beef.

However, the UK Government recently announced temporary rates at which import tariffs on agricultural goods will be imposed in the event of a 'no-deal' Brexit⁴ [UK Department for International Trade 2019]. This tariff rate schedule reflects a significant liberalization of foreign trade policy and a loss of tariff preferences for EU-27 products in the British market. These tariffs, in '*ad valorem*' terms, occurred to be much lower compared to the EU's CET (Table 2). Considering that, currently, British imports from the EU are duty free, tariffs on UK imports from Poland under a 'no-deal' Brexit would be high in many cases with beef being the most protected (the UK is a net importer of beef). Except for cereal, certain dairy products (and raw milk), vegetables, fruits, fats and oils (with tariffs at zero), the other products will be subject to import duty.

As the UK has a large deficit in agri-food trade with Poland (Table 1), the tariff burden on its demand side (UK imports) will be much higher than on the supply side (UK exports). This would have obvious implications on Poland's export opportunities. Moving from free trade (single market and a customs union) to the adoption of either EU CET tariffs or relatively lower tariffs, published by the UK government, would trigger a reduction of UK imports of these products from Poland as it accesses the British market as a third country. On the one hand, the reduction of current UK tariff protection against third countries (Table 2) would lower UK import prices from countries outside the EU meaning stronger price competition on the UK market for Polish exporters. On the other hand, given that agri-food trade between the UK and Poland is now free, tariffs imposed on trade flows between the two countries as well as higher trade costs (e.g. these of a formal customs declaration, checking rules of origin, new animal health certificates and commercial documents, regulatory divergence) would also make Polish exports of agri-food products less competitive, among others in relation to UK domestic production which would become more attractive (relatively cheaper).

⁴ Up to the time of writing this paper, they had not been approved by the UK House of Commons.

Table 2. EU's CET and UK's (under 'no-deal' Brexit) import tariff rates against third countries on a sample of agri-food products

Code	Product	Tariff rate		Effective <i>ad valorem</i> rate [%]*	
		EU	UK	EU	UK
201	Fresh or chilled beef/veal				
2011000	Carcasses or half-carcasses	12.8% + €176.8/100 kg	6.8% + €93.3/100 kg	70	37
2012020	Compensated quarters, bone-in	12.8% + €176.8/100 kg	6.8% + €93.3/100 kg	77	40
2022090	Other bone-in cuts	12.8% + €265.3/100 kg	6.8% + €160.5/100 kg	171	91
2023050	Boneless crop, chuck-and-blade and brisket cuts	12.8% + €221.1/100 kg	6.8% + €116.7/100 kg	67	36
2023090	Other boneless cuts	12.8% + €304.1/100 kg	6.8% + €160.5/100 kg	150	79
206	Edible offal				
2061095	Fresh/chilled thick skirt & thin skirt	12.8% + €303.4/100 kg	6.8% + €160.1/100 kg	114	60
2061098	Other fresh/chilled bovine offal	free	free		
2062991	Frozen thick skirt & thin skirt	12.8% + €304.1/100 kg	6.8% + €160.5/100 kg	142	75
2062999	Other frozen bovine offal	free	free		
1602	Prepared or preserved meat				
16025010	Uncooked or mixed cooked/uncooked bovine meat/offal	€303.4/100 kg	€160.1/100 kg	105	55
16029061	Other processed products containing uncooked or mixed cooked/uncooked bovine meat/offal	€303.4/100 kg	free	148	
203	Fresh/frozen pork				
2031110	Fresh/chilled carcasses and half-carcasses	€53.6/100 kg	€7.1/100 kg	30	4
2031211	Fresh/chilled bone-in hams and cuts	€77.8/100 kg	€10.2/100 kg	44	6
2031955	Fresh/chilled boneless pork	€86.9/100 kg	€11.4/100 kg	35	5
2032913	Frozen bone-in loins and cuts	€86.9/100 kg	€11.4/100 kg	35	5
2032955	Frozen boneless pork	€86.9/100 kg	€11.4/100 kg	42	6
1602	Prepared or preserved meat				
16024110	Prepared or preserved hams and cuts	€156.8/100 kg	€20.6/100 kg	38	5
16024911	Prepared or preserved loins and mixed loins/hams	€156.8/100 kg	€20.6/100 kg	42	5

Table 2. Cont.

Code	Product	Tariff rate		Effective <i>ad valorem</i> rate [%]*	
		EU	UK	EU	UK
402	Milk & cream, concentrated or sweetened				
4021019	In solid form, unsweetened, fat content ≤ 1.5%, in immediate packings > 2.5 kg	€118.8/100 kg	free	67	
403	Buttermilk, yoghurt and similar products				
4039093	Buttermilk and similar products, flavoured or with added fruit, nuts or cocoa, of milkfat content 3-6%	8.3% + €17.1/100 kg	free	23	
405	Butter, fat/oil and dairy spreads				
4051011	Natural butter, fat content ≤ 85%, in immediate packings of ≤ 1 kg	€189.6/100 kg	€60.5/100 kg	38	12
4051019	Natural butter, fat content ≤ 85%, in immediate packings > 1 kg	€189.6/100 kg	€60.5/100 kg	46	15
406	Cheese and curd				
4061030	Fresh Mozzarella, fat content ≤ 40%	€185.2/100 kg	free	61	
4063010	Processed Emmental, Gruyere and Appenzell cheese	€144.9/100 kg	€19.1/100 kg	36	5
7	Edible vegetables				
7108095	Frozen vegetables not elsewhere specified	14.4%	free		
8	Edible fruit and nuts, peel				
8081080	Fresh apples (exc. bulk cider apples)	Rate varies depending on price & date	free		
10	Cereal				
10019900	Wheat and meslin (exc. seed for sowing)	€95/tonne	free	47	
10039000	Barley (excluding seed for sowing)	€93/tonne	free	53	
10059000	Maize (excluding seed for sowing)	€94/tonne	free	52	
15	Fat and oil				
15141990	Low erucic Acid rape or colza oil (exc. crude or for technical/industrial use)	9.6%	free		

* Percentage increase in price that tariffs add to the cost of imported products (based on 2016-2018 average prices). If there is a Tariff-Rate Quota (TRQ) for a commodity, the in-quota rate of duty will be 0%.

Source: own compilation based on [AHDB 2019]

It is worth bearing in mind that post Brexit agri-food exports to the UK may have to overcome higher non-tariff barriers to trade (NTBs) than existing ones, such as sanitary and phytosanitary measures. Additionally, the potential devaluation of the pound would weaken the competitiveness of Polish producers (imported products in the UK will become more expensive).

The above predictions are supported by some empirical studies which attempt to estimate the potential impacts of a hard Brexit on UK imports of agri-food commodities. Julio Nogues [2019], relying on simple average MFN tariffs for agro industrial products (contained in the first 24 chapters of the HS), estimated that a ‘no deal’ Brexit will reduce UK imports of these products from the EU by around 50% in value terms⁵, i.e. by more than double the contraction in imports of manufactured goods (22%). The difference between Brexit trade impacts on both of these groups is, to a great extent, a consequence of an average MFN tariff for agri-food products (16%) that is much higher than for manufactured goods (4%).

In another research by Marco Springmann and Florian Freund [2018], it was found that under the hard Brexit scenario, UK simulated imports decline by about 2/3 for pork and poultry (64%) and dairy (66%), and by 1/3 for beef and lamb (36%), sugar (39%) and wheat (29%)⁶.

IMPORT/EXPORT FORMALITIES BETWEEN EU MEMBER STATES AND GREAT BRITAIN

Although there still is uncertainty about the aftermath-Brexit trading regime between the EU and the UK, both British EU-27 businesses should be aware of and prepared for potential changes.

With a hard Brexit, the EU will apply third (non-EU) country rules to the UK in relation to, for example, customs inspections and checks to make sure EU requirements on goods are met (e.g. veterinary control checks). The customs authorities of member states will apply EU rules on the movement of goods from and into the UK as are currently applied to third countries. Polish entrepreneurs will be obliged, *inter alia*, to complete standard customs formalities, including registering in the “e-Customer” (“e-Klient”) National Tax Administration service, applying for the EORI (Economic Operators’ Registration and Identification) number, submitting customs declarations as well as paying customs duties and tax fees (VAT and excise) [MF 2019].

The European Commission [EC 2019] asks EU traders to assess whether their businesses trade with the UK or move goods through the UK. If they do, the Commission advises:

⁵ These estimates did not take into account that several agri-food products (particularly meats and dairy products) enter the EU under Tariff-Rate-Quotas (TRQs) paying zero or low tariffs for in-quota imports.

⁶ Authors assume the following: UK-EU trade is governed by WTO conditions (MFN tariffs are levied on each other’s imports), non-tariff measures will rise due to leaving the single market, the UK loses its preferential access to third countries and does not take part in the EU’s Generalized System of Preferences, under which the EU unilaterally opens its markets for about 90 developing countries.

- to register the trader’s business with the national customs authority to trade with non-EU countries, if not done so thus far, and consider applying for Authorised Economic Operator (AEO) status from the national customs authority;
- to assess whether the trader’s business has the necessary resources and capacity (staff, access to IT etc.) and holds all necessary customs authorizations to export or import;
- to ask the trader’s national customs authority which existing customs simplifications and facilitations are available for business, such as guarantees and transit simplifications;
- to exchange information with business partners (suppliers, intermediaries, carriers etc.) as Brexit might also impact the trader’s supply chain.

SUMMARY

This paper provides an analysis of how Poland’s trade with the UK (particularly Polish exports) may be affected by the withdrawal of the latter state from the European Union. A ‘no-deal’ Brexit, at the end of October 2019, that is currently the most likely scenario, will bring a significant change in the UK-Poland trading relationship and will cause impacts that are hard to predict precisely. Considering today’s preferential access to the UK market, Polish agri-food producers, without a free-trade deal following Brexit, will face a heavy additional burden on their exports to the UK compared to the current situation. Although temporary tariffs on UK imports (so far published) to be imposed in the event of a ‘no-deal’ Brexit will generally be charged at lower levels than these of the EU bound tariff schedule, the UK market will become much less attractive for Polish exporters, especially in the case of bovine, pork and dairy products. Additionally, their ability to compete for access to the British market against both lower cost exporters from outside the EU and UK domestic producers will be lower.

The UK’s hard exit from the EU will have a disruptive effect on companies in Poland that trade in agri-food products with the UK or are affected by UK participation in the single market in other ways. Their imports from the UK will immediately be subject to EU tariffs and their exports (of certain products) into the UK will respectively be subject to UK tariffs. Additionally, border controls between Poland and the UK will be introduced. So, Polish exporters to the UK will have to optimally adapt new bilateral trading conditions and/or find new markets for their products.

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WPŁYW BREXITU NA HANDEL ROLNO-ŻYWNOŚCIOWY MIĘDZY POLSKĄ A WIELKĄ BRYTANIĄ

Słowa kluczowe: sektor rolno-spożywczy, handel zagraniczny, Unia Europejska, Brexit, Wielka Brytania, Polska

ABSTRAKT

Artykuł stanowi przyczynek do dyskusji na temat przewidywanych konsekwencji wystąpienia Zjednoczonego Królestwa z Unii Europejskiej w obszarze stosunków handlowych tego państwa z Polską. Jego celem jest ukazanie, jak twardy (tj. bez umowy pomiędzy UE a Wielką Brytanią) Brexit może odbić się na bilateralnej wymianie towarów rolno-żywnościowych (zwłaszcza na ich polskim eksporcie). Problem jest ważny, zważywszy, że w ostatnich latach Wielka Brytania była drugim pod względem wielkości importerem tych produktów z Polski, wykazując przy tym deficyt handlowy. Źródłem danych empirycznych jest m.in. baza Comtrade ONZ, GUS oraz brytyjski Departament Handlu Międzynarodowego. Zakładając wprowadzenie ogłoszonej przez rząd brytyjski taryfy celnej na import produktów rolno-spożywczych z krajów trzecich oraz dodatkowych barier pozataryfowych, a ponadto wzrost kosztów transakcyjnych związanych z wymianą handlową, twardy Brexit przyniesie poważne konsekwencje dla dotychczas szybko rosnącego polskiego eksportu rolno-spożywczego do Wielkiej Brytanii, prowadząc nawet do jego załamania w przypadku niektórych produktów (np. mięsnych i mleczarskich). Utrata swobody przepływu towarów pomiędzy oboma krajami pogorszy konkurencyjność polskich producentów na rynku brytyjskim zarówno wobec producentów brytyjskich, jak i eksporterów spoza UE.

AUTHOR

ALDONA ZAWOJSKA, PROF. WULS, DR HAB,
ORCID: 0000-0003-3668-0127

Warsaw University of Life Sciences – SGGW
Faculty of Economic Sciences

Department of Economics and Economic Policy
166 Nowoursynowska St., 02-787 Warsaw, Poland