

CERTIFICATES AND RULES OF ORIGIN: THE EXPERIENCE OF UK FIRMS

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PETER HOLMES AND NICK JACOB
UK TRADE POLICY OBSERVATORY

KEY POINTS

- Exporters are generally required to prove the origin of goods — as defined by agreed Rules of Origin — to customs authorities. This is likely to become a far bigger issue after Brexit.
- While most academic studies have generally found high costs of compliance associated with Rules of Origin, our study suggests compliance is not as costly for firms as previously thought.
- The current option of Certificates of Origin supplied by Chambers of Commerce is tried and tested and offers a private-sector solution for firms to show compliance with Rules of Origin. Certificates could be used for goods trade under a possible EU-UK Free Trade Agreement post-Brexit, as well as for FTAs with other countries.
- Post-Brexit, a pre-approval system via a scheme operated by the UK and European Union customs authorities offers scope for streamlining the process of proving origin but might not be easily scalable, as it would require additional HMRC resources.
- Our research reveals issues around compliance with Rules of Origin, finding that a substantial minority of firms are unsure of how RoOs work and the options available to firms for compliance.

INTRODUCTION

The traditional economics literature on Rules of Origin (see online Appendix: blogs.sussex.ac.uk/uktpo/publications) has identified compliance as creating serious problems for traders. These problems can be at several levels. There is a cost, not always financial, of understanding the rules, and then the cost of setting up systems to ensure compliance. Our study largely covers firms who have overcome these problems, though we have identified some issues regarding whether firms always understood RoOs correctly. Finally, there is the actual ongoing operational cost of compliance. We find that the cash outlays involved in the last stage appear small but there are doubts about the ability (a) of firms not currently using origin declaration for trade within the EU dealing with the need for proof of origin, and (b) of existing users to cope with a new situation post-Brexit.

Proving origin will be a far bigger issue than it is now for UK business exporting to the EU after Brexit. About half of UK exports go to the EU, and hence face minimal customs procedures at the moment. As a Customs Union which collects import duties at the external border, all goods produced in the EU or imports from third countries that have cleared customs are in “free circulation” and need no proof of where they originated. Before complete unification of the EU’s common commercial policy there were some anomalies leading to the need to demonstrate the origin of goods within the Common Market, notably where Member states had different quota regimes. But since 1993 there has been no need for UK firms selling in the EU to prove the origin of their goods.

However, in any form of Free Trade Area, as opposed to a Customs Union, there is a need to prove origin.

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Goods coming from non-EU European Economic Area (EEA) states (Norway, Liechtenstein and Iceland) need to prove their origin to determine whether they are exempt from tariffs under the terms of the EEA, or subject to EU tariffs as non-EEA products. This is important for goods involved in global value chains whose origin may not be easy to measure. After Brexit, the UK and EU may sign a Free Trade Agreement (FTA) and hence be subject to the same sort of procedure. Rules of Origin (RoOs) which spell out how sellers must demonstrate the origin of goods are likely to be complex and differ between products. UK firms will have to prove the UK origin of their goods in order to benefit from a UK-EU FTA — as well as for any potential FTAs with third (non-EU) countries.

As with many other forms of non-tariff barriers, the issue of the substance of RoOs is distinct from the process under which firms prove that they actually comply. This process is not up to the UK alone. The EU or other new FTA partners will discuss in negotiations the conditions under which they will give preferential access to UK products, and vice-versa, as well as the options for demonstrating origin.

The purpose of this paper is to explore, in particular, the experience of UK firms with using Certificates of Origin, how well they understand the process, and why they choose this or any other option to declare origin. We discuss below the several different options for proving the origin of goods.

RULES OF ORIGIN: A PRIMER

Rules of Origin (RoOs) are used in the international trading system to determine if a product is considered as sufficiently linked to the exporting country to count as originating there. The importance of RoOs is due to the fact that duties and restrictions in many cases depend upon the source of imports.¹

Under a Free Trade Agreement, RoOs are used to establish whether a product can receive the preferential rate of duty. In cases where there is no FTA in place, importing countries sometimes, but not always, require origin to be proved for reasons of national trade policy.

Rules for determining preferential origin (origin that is eligible for preferential tariff rates) are made at the product level by FTA partners. Non-preferential RoOs are set by importing countries for purposes including statistical requirements and anti-dumping².

RoOs usually fall into one of four types:

1. That the product is fully originating from that country.
2. That at least a certain percentage of value-added parts or components is derived from the FTA area, or that the product contains a maximum share of non-originating materials.
3. That a change of classification has taken place within the FTA area because of a change in the nature of goods — imported inputs are transformed to a new commodity product code under the Harmonised System classification that is used in international trade.
4. That a specific process has been carried out, or a particular input obtained, within the FTA area.

UK exporters can currently find the exact rule that applies to their product for each importer country by using the EU's Market Access Database³.

Origin can be declared in several ways. Usually the exporting producer supplies documents — Certificates of Origin (COs) — to the importer for the importing country's customs authorities:

1. Preferential Certificates of Origin: the EUR1

Preferential COs certify that goods qualify for reduced tariffs or exemptions when they are exported to countries that are members of a Free Trade Agreement. In the EU, this type of CO is known as an EUR1 Movement Certificate. In the UK, they can be obtained from a Chamber of Commerce⁴. In addition, the "A.TR" certificate entitles goods, which are in 'free circulation' in the EU, to receive preferential import duty treatment when shipped to Turkey⁵.

The UK Chambers of Commerce check that applications are completed correctly, advise of any errors on the form, inform the exporter of their responsibilities, then stamp the document with a customs stamp. Chambers of Commerce certify COs on behalf of Her Majesty's Revenue and Customs.

The exporter does not have to provide evidence that the goods meet the relevant rule of origin in order to obtain an EUR1, but must declare that they do meet the rules and the exporter has a responsibility to keep evidence of compliance. Declarations of origin that are challenged by customs authorities in importing countries can lead to HMRC inspections.

1 https://www.wto.org/english/tratop_e/roi_e/roi_info_e.htm

2 See https://ec.europa.eu/taxation_customs/business/calculation-customs-duties/rules-origin/nonpreferential-origin/introduction_en. WTO rules leave importers broad discretion although there is a longstanding attempt to harmonise, see Hoekman and Inama (2017).

3 See: <http://madb.europa.eu/madb/indexPubli.htm>

4 As an example, the London Chamber charges £20.70 to members and £41.70 to non-members for an EUR1 certificate.

5 See <https://www.gov.uk/government/publications/notice-812-european-community-preferences-trade-with-turkey/notice-812-european-community-preferences-trade-with-turkey>

2. Low-value invoice declaration

For low value consignments, companies can make an invoice declaration —a specially worded and signed statement on the export invoice or other commercial document relating to the consignment⁶. Low value typically means under €6,000 (£5,700).

3. Approved exporter invoice declaration

EU firms can apply for Approved Exporter⁷ (AE) status from their national customs authorities, allowing them to make statements of preferential origin using an invoice declaration⁸ (with no upper limit on value) instead of using an EUR1 form. There is no fee for getting AE status but the application involves submitting documents to HMRC which might be time-consuming.

In the UK, HMRC states⁹ that a firm may be authorised as such if HMRC is satisfied that 1) the firm exports or intends to export on a regular basis; 2) the goods to be exported satisfy the relevant origin rules and; 3) the firm will correctly complete the documents and take proper care of them. Authorised Exporter approval pertains only to specified goods and is not a general authorisation of the exporter.

Approved Exporter status is the only option, except for the low value-exemption described above, under which a company can claim preference under the EU-South Korea agreement (so an exporter to South Korea cannot use a Preferential CO to claim preferential tariff rates).

Once a firm has Approved Exporter status it continues to have a responsibility to keep the documentation required to prove origin. Customs authorities can conduct random checks, and origin can be challenged in the importing country, as with preferential COs (see above), triggering exporter-country authorities to conduct checks. We were unable to find data on the incidence of checks.

4. Registered exporter system (REX)

REX is an online database of registered exporters that was launched by the European Union at the start of 2017 with a focus on trade with countries under its

⁶ See: <https://www.gov.uk/government/publications/notice-827-european-union-preferences-export-procedures/notice-827-european-union-preferences-export-procedures>.

⁷ Approved Exporter status needs to be distinguished from 'Authorised Economic Operator' status, which helps with guaranteeing the authenticity of paperwork accompanying exports, as well as helping companies go through customs checks more quickly, but does not itself provide a way to establish origin. See <https://www.gov.uk/guidance/authorised-economic-operator-certification>.

⁸ See: https://ec.europa.eu/taxation_customs/business/calculation-customs-duties/rules-origin/general-aspects-preferential-origin/common-provisions_en#value_limits.

⁹ See: <https://www.gov.uk/government/publications/notice-827-european-union-preferences-export-procedures/notice-827-european-union-preferences-export-procedures>

Generalised System of Preferences (GSP). At present, REX mostly concerns imports from GSP countries. However, we understand the EU wants to roll out REX to all its future trade agreements, starting with the EU-Canada Comprehensive Economic and Trade Agreement (CETA)¹⁰.

With REX, a statement on origin by the firm replaces a Certificate of Origin, making it a similar system to Approved Exporter¹¹.

ORIGIN AFTER BREXIT

Assuming that there will be an FTA with the EU-27, firms will be required to prove origin using one of the methods detailed above.

We understand that the EU's ambition is to use the REX system for all of its future trade agreements. If the UK agreed to sign up to this system, all firms selling to the EU 27 would have to apply to HMRC for registration. But we do not know what final decision will be taken. The current preferential certificate of origin could also be used, possibly alongside REX or Approved Exporter mechanisms, and would involve the least change in current processes.

Finally, in a no-deal scenario, UK firms may be required to obtain non-preferential Certificates of Origin to export to the EU-27 as is the case for non FTA partners now (and also to export to current EU FTA partners with whom the UK does not put an FTA in place by the leaving date)¹².

INTERVIEWS WITH UK FIRMS

The academic and policy literature (see online Appendix: blogs.sussex.ac.uk/uktpo/publications) tends to conclude that certifying origin often represents a large cost for business, and that firms will not claim eligible preferences if the cost exceeds the saving on duty.

In order to better understand this issue, we conducted a series of interviews with small and medium-sized UK exporters, and conducted a shorter online survey with a larger group.

¹⁰ Under CETA, Canadian exporters to the EU will be registered in Canada. See: https://ec.europa.eu/taxation_customs/sites/taxation/files/registered_exporter_system_rex_-_guidance_document_v1_en.pdf

¹¹ See https://ec.europa.eu/taxation_customs/sites/taxation/files/registered_exporter_system_rex_-_guidance_document_v1_en.pdf

¹² See https://ec.europa.eu/taxation_customs/business/calculation-customs-duties/rules-origin/nonpreferential-origin/introduction_en.

The sample of interviewed firms should not be thought of as a random or representative sample: it was composed of firms that were proposed by BCC member Chambers as known users of COs. As such, these firms are all using the current CO system but there might perhaps be other firms who are not exporting at all, precisely because of the difficulty they experience using that system. While we cannot draw strong conclusions from such a sample, it provides valuable information as a fact-finding exercise and a series of case studies.

We conducted twelve interviews by telephone in late August-early September 2017, with participants including Chief Executive Officers, Chief Financial Officers and Export Managers. The interviews were based around a template asking about firms' use of certificates, the costs and benefits of the ways they prove origin, the rules they face and the documentation they keep, but allowed respondents to discuss aspects relevant to their role and the firm's activity in trade.

Firms ranged in size from 10 to 500 UK employees. They represented a range of manufacturing sectors such as machinery, textiles and medical devices. Exports made up at least 30% and up to 95% of firms' sales with all exporting to the EU and at least some non-EU countries. Frequency of export shipments ranged from multiple times per day, to once a fortnight.

We would like to take this opportunity to thank all the participants.

WHY DO FIRMS USE PREFERENTIAL COs?

The correlation — or lack of it — of preference utilisation rates with the level of preference margins is a key theme of the academic literature on Certificates of Origin. From the point of view of the UK firms we spoke to, however, the take-up of preferences appears almost entirely driven by the demands of the foreign customer and market conditions, and we do not know whether preference margins given the size of the shipment or the restrictiveness of the RoO are the reasons behind the importer seeking a CO.

Asked whether the firm always uses preference certificates whenever they are available, only half of interviewees said 'yes'. The remainder obtained an EUR1 certificate only if a customer requested one. This is understandable since the requirement of obtaining the certificate falls on the exporter. However, the customs duty is payable by the importer at the point of entry — so it is possible that importers in EU FTA partners are not always aware of potential duty savings. Indeed, in the mirror image situation we spoke to one UK-based import-export business that was not aware of the procedure required to save them duty on their imported inputs arriving from FTA partners.

“We operate in such a competitive market that we always get an EUR1 [preferential Certificate of Origin] if it's available.”

WHAT ARE THE (ADDITIONAL) BENEFITS OF PREFERENTIAL COs?

In discussions, some firms cited benefits to the EUR1 system over and above the duty saved. For two respondents, the declaration of EU origin was seen by customers as a mark of quality, one of which also said that it “probably” helped to clear importing customs. However, the overriding benefits, as expected, were the duty savings for the customer.

“Duty savings are a big commercial driver for the business so we always get an EUR1 [preferential Certificate of Origin] form where possible.”

WHY DO FIRMS USE NON-PREFERENTIAL COs?

Some countries require some imports to have a CO even if it does not grant preferences. These non-preferential COs have their own rules – determined by the importing country, or if this does not have its own rules, then by the country of the exporter. Many firms we talked to did not understand the system and, among those that did, customer requirements were the main reason for use. One firm cited banking requirements for letters of credit. Two firms making products classified as medical devices provide COs as part of broader regulatory requirements.

A non-preferential CO does not help the goods qualify for any reduction in duty rates. Not all non-preferential trade requires a CO, and sometimes it is a commercial requirement rather than a customs requirement. COs may, for instance, be needed at a buyer's request, or to prove that goods do not originate in countries that face sanctions in the importing country, or for antidumping enforcement, or for regulatory or statistical purposes.

A non-preferential CO can be obtained from a Chamber of Commerce.¹³ Costs vary, depending on the Chamber and whether the firm is a member but is around £20-£50¹⁴ per certificate. A CO can be obtained online. The process is electronic, and the document is ultimately produced as a paper document as is stipulated by the World Customs

¹³ See: <https://iccwbo.org/resources-for-business/certificates-of-origin/international-certificate-origin-council/>

¹⁴ For instance, the London Chamber of Commerce charges £24.30 for members and £48.60 for non-members. See http://www.londonchamber.co.uk/lcc_public/article.asp?aid=103

Organisation.

APPROVED EXPORTERS

Four of our interviewees said they were Approved Exporters but there was not wide awareness of the existence of the system among the others. The Approved Exporters were unanimous in describing the benefits as savings in time and cost of applying for EUR1 preferential certificates, with the most frequent exporter explaining that the 20-30 minutes per shipment saved is the equivalent to two employee-hours per day, in addition to the certificate and courier charges.

WHAT ARE THE COSTS AND CHALLENGES OF CLAIMING ORIGIN?

None of the twelve exporters we spoke to at length — eight of which were not Approved Exporters and therefore relied on the Certificates of Origin system — considered the origin certification process to be excessively costly. Typically, interviewees — all firms that regularly used the system — cited a time cost of approximately 20-30 minutes per shipment to request, fill in and return a certificate. Usual charges cited for a certificate are around £30 from a Chamber of Commerce, with some firms facing additional courier costs.

Firms also face an administrative cost to ensure a product meets the relevant RoO before claiming preferences on an EUR1 certificate, and then managing and tracking the relevant documentation in case the status of the product is questioned by importing-country customs authorities, as is requested under the terms of a Free Trade Agreements.

This was a topic with widely varying responses and it was not always clear that the individuals we interviewed knew the specific rules that they are required to meet, or whether the firm itself did.

One trade consultant summed up the situation.

“I would say the majority of manufacturing businesses do not understand RoOs. Others don’t do it at all, or do it only when they are asked by their customer.”

Some firms appeared to be unclear on even what type of RoOs they need to comply with. We asked ten of the firms whether they knew the type of RoO which they faced (for instance, transformation, minimum content or specific process) and only five said they were sure. This points to a need to support companies over this issue in the future.

Only two out of twelve firms mentioned obtaining supplier declarations as part of the origin-documentation process, while others keep track of the origin of inputs through ERP (Enterprise Resource Planning) business management systems. This appears often to be for non-origin related reasons: businesses might for instance offer guarantees or warranties and therefore need to ensure they know where particular components were sourced. Among those which had processes in place, the set-up was the most time-consuming element.

“Putting in place a full customs compliance system has taken time and involved getting long term supplier declarations, but once that is done for a product it is relatively easy to manage.”

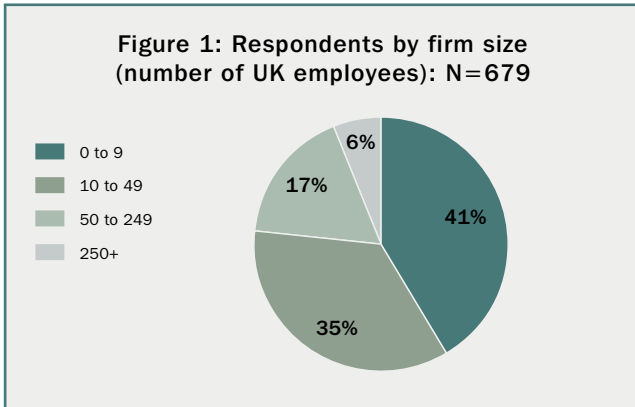
FIRM INTERVIEWS: CONCLUSIONS

The businesses that we spoke to tended to be very focused on customer requirements, seeing RoOs as a relatively minor bureaucratic process to go through when exporting but not generally a particularly time-consuming or costly one. However, these interviews have also revealed that firms are not always entirely sure of the rules they face and thus there may be errors in compliance. For example, one respondent assumed that all intermediates bought from sellers in the UK automatically counted as ‘originating’ for the purposes of calculating the origin of the final product. The introduction of post-Brexit origin requirements might therefore require a push to better inform firms about what constitutes compliance.

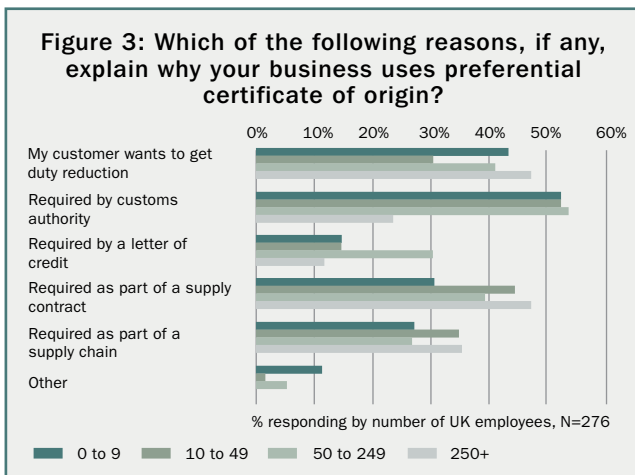
INTERNATIONAL TRADE SURVEY

In order to further investigate firms’ use of COs, we turned to a larger sample of firms available through the British Chambers of Commerce annual International Trade Survey (ITS). The ITS is an annual survey of members of the UK Chambers of Commerce which, in 2017, was carried out online in late September to early October. Respondents were primarily at senior management level. In 2017 it had over 1,600 respondents. Respondents were filtered for those that said they exported to non-EU countries, giving a sample of 679 firms¹⁵. Small firms (0-49 UK-based employees) represent 76% of the sample.

¹⁵ There was a substantial non-response rate among these firms to the detailed questions which follow. Sample counts are given in each figure.

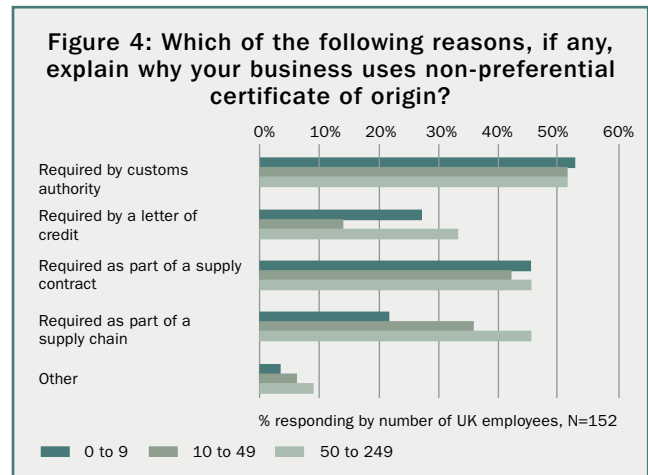


Even among this sample of firms that export to non-EU countries, a substantial fraction claim not to use any type of CO (Figure 2). There could be several reasons for this. For instance, these firms might not be exporting to preference-granting countries (i.e. to EU FTA partners) and they might be exporting products for which the importing country does not require a non-preferential CO. Firms could also be making shipments below the €6,000 maximum size for certificate-free exports or be part of the Approved Exporter scheme (see Figure 5).



Our interviews indicated that customer requirements were the key determinant of whether firms use COs, either preferential or non-preferential. This is supported by the larger sample of firms in the survey. This question allowed firms to select multiple reasons for using a preferential CO. 'Duty reduction', 'Supply contract' and 'Supply chain' were all heavily selected. However, the most commonly cited reason was a 'customs authority requirement'. While some countries explicitly require non-preferential COs, in many cases, it is only a customs requirement if the firm wants to claim the preferential rate of duty, so we interpret this as firms, or their customers, seeking the lower duty rate. Finally, for a smaller fraction of firms, the demands of financial institutions for a letter of credit are also cited as a reason for using a CO.

For non-preferential COs, a 'Letter of Credit' is a more common reason than for preferential COs. 'Supply contract' / 'Supply chain' reasons also appear frequently.



Note: Large firms (UK employees > 250) not shown due to low number of responses (4)

Question 4 asked exporters to non-EU countries that do not use any type of CO why not. The largest category of response was 'Don't know'. This may be related to the functional role of respondents, i.e. they were not in a position to know the reason for a company's policy but analysis of the other responses provides some useful information about the behaviour of UK firms.

For example, over 30% of the smallest firms admitted to lacking understanding of COs, so if there is an expansion of the system under a future trade agreement with the EU, providing these firms with more information might be helpful in export promotion for small businesses.

The Approved Exporter scheme appears more popular with larger exporters while, as could be expected, smaller firms are more likely to ship small consignments and so not require a CO.

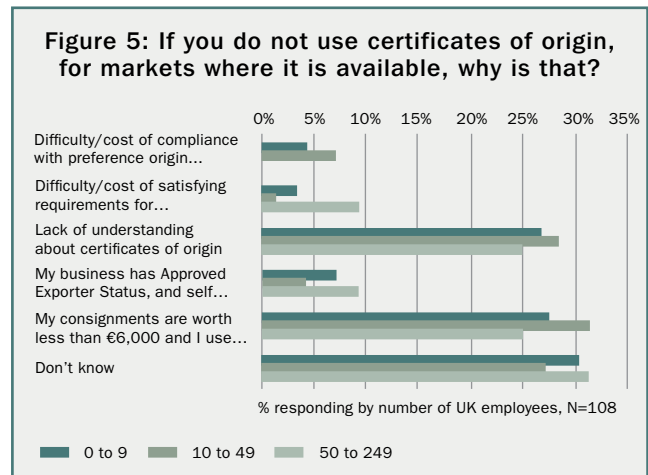
Notably, though, no category of firm highly cited the difficulties of actually complying with RoOs, whether

in terms of sourcing inputs or dealing with the rules themselves, as a reason for not using COs.

This lends weight to the argument that, for most firms, it does not appear to be the details of the rules in place that are greatest barrier to trade but that firms often lack the knowledge of how to use COs to obtain preferential market access.

SURVEY: KEY FINDINGS

The International Trade Survey supported the case study evidence that the use of Certificates of Origin is largely driven by importing-customer requirements and not by the RoOs themselves. There also appears to be a substantial minority of firms that lack understanding and information about the options to prove origin.



Note: Large firms (UK employees > 250) not shown due to low number of responses (4)

CONCLUSION

As we noted earlier, the traditional economics literature on Rules of Origin has identified compliance as creating serious problems for traders. Our work suggests that the problems must be unpacked. There is a cost, not always financial, of understanding the rules. Our study largely covers firms who think they have overcome this problem, though they may not always understand the rules correctly. There is then the cost of setting up systems to ensure compliance, and finally the actual ongoing operational cost of compliance. We find that the cash outlays involved appear small.

This paper has presented new evidence on UK firms' approach to Certificates of Origin, through one-on-one interview case studies and an online survey. The current system appears to work well in practice, with the tried-and-tested use of COs to prove origin not seeming to be unduly onerous, especially when combined with the Approved Exporter scheme for frequent shippers.

The CO system overseen by the Chambers of Commerce is also scalable to a large post-Brexit expansion and offers a private sector solution to proving origin. Approved Exporter offers the possibility of streamlining individual shipments for firms, but at the cost of large numbers of exporters requiring approval from HMRC. HMRC would thus need the staff to monitor the initial approval of every firm, without necessarily reducing inspection costs later, even though firms' compliance costs would be lower.

However, all businesses are likely to have to rethink their RoO compliance post-Brexit as previously 'originating' inputs change status¹⁶. Those firms already comfortable with RoOs would have to extend their activity to trade with the EU-27 and they might also have to adjust to a new system, such as REX. Firms currently only trading with the EU, and therefore not having to meet or show compliance with RoOs, would have to learn how to do so. Continuity of process for declaring origin would clearly have advantages.

Our evidence shows that there is weak understanding of the current rules. This could potentially present problems if the system is expanded, leading many more firms to require COs in the future. Problems relating to RoOs could become more of an issue if the atmosphere surrounding UK-EU trade deteriorates. It therefore appears to be important that small and medium sized firms are provided with adequate support to navigate RoOs. This would allow them to take advantage of any preferential tariff rates that might be negotiated, as well as to maintain continuity in the means by which firms declare origin.

An Online Appendix available at: blogs.sussex.ac.uk/uktpo/publications contains a literature review and a full bibliography for this document.

¹⁶ Firms that currently only export to the EU would be drawn into the RoO process under an FTA and would need to keep records proving the origin of their goods, whereas as now they do not require a CO

ABOUT THE AUTHORS

Peter Holmes Peter Holmes did his BA and PhD in Economics at the University of Cambridge. He is a Reader in Economics at the University of Sussex where he has taught since 1974, and a fellow of the UKTPO. He is also a visiting Professor in the College of Europe and a director of InterAnalysis, a University spinoff company, which provides software and capacity building courses on trade and trade policy all over the world. He is a specialist in Economic Integration and the WTO. He is interested in the relationship among the complex of policies on trade, competition, regulation, and technology; he has collaborated with lawyers and political scientists. He has written reports for the European Commission and the World Bank. Other work covers: anti-dumping, trade and competition negotiations and dispute settlement at the WTO; the patentability of software; regionalism and development. He has given evidence to the House of Lords.

Nick Jacob is a PhD Candidate in Economics at the University of Sussex. He has a BA in History from the University of Cambridge, and an MSc in Economics from Sussex. He was previously a financial journalist, and was editor of capital markets publication EuroWeek (now GlobalCapital), where he is a contributing editor. His research interests are in productivity, international trade and agglomeration.

FURTHER INFORMATION

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The UK Trade Policy observatory (UKTPO), a partnership between the University of Sussex and Chatham House, is an independent expert group that:

- 1) initiates, comments on and analyses trade policy proposals for the UK; and
- 2) trains British policy makers, negotiators and other interested parties through tailored training packages.

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For further information on this theme or the work of the UK Trade Observatory, please contact:

Professor L Alan Winters

Director

UK Trade Policy Observatory

University of Sussex, Room 280, Jubilee Building,
Falmer, BN1 9SL

Email: uktpo@sussex.ac.uk

Website: blogs.sussex.ac.uk/uktpo

 Twitter: [@uk_tpo](https://twitter.com/uk_tpo)

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