

Bridging the Channel

The UK's Post-Brexit Return to Europe



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BIGA, Euro Prospects

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Editor's Note:

The Post-Brexit EU–UK Partnership In an Unpredictable World

At the English Channel's narrowest point, 35 kilometres or a 1.5-hour ferry ride is all that separates the United Kingdom from continental Europe. From the Norman Invasion of 1066 to the Normandy landings of 1944, the Channel has become an emblem in the historical evolution of the Anglo-European political landscape.

Fast forward to today, and the Channel once more finds ascendancy in political metaphors. The fractures induced by the latest Trump administration on US policy towards Europe have fundamentally reframed post-Brexit British relations with the EU. While once considered a partnership untapped of its full potential because of EU membership, the US-UK 'special relationship' now contains few of the rewards that proponents of Brexit envisioned. Instead, or more likely because of it, rapprochement between the Union and its former member is accelerating, six years on from Brexit.

Under an increasingly fragmented world, a consolidation of middle powers united by their adherence to values of liberal democracy seems to be emerging; more often than we'd like to think, out of pure necessity. It is under this context that post-Brexit EU–UK relations find themselves confronting many of the same challenges: from Russian aggression and waning competitiveness to demographic decline, the approach to migration, and the emergence of China.

Against this background, Euro Prospects and the British Institute of Global Affairs present their inaugural collaborative policy compilation, compiling eight articles on UK-EU post-Brexit rapprochement, exploring some of the issues and considerations that will shape this new chapter of cross-channel geopolitics.

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EU–UK Sanctions on Russia Are Only as Strong as Political Trust

By *Alina Tratorova*

ANALYSIS

Russia Correspondent, Euro Prospects

Four years into Western sanctions on Russia, the EU and UK remain powerful but poorly connected allies. Without a formal coordination framework, their unity is one political shift away from fracture.

On 23 April 2026, the EU adopted its 20th package of sanctions against Russia, the largest set of individual listings in two years, targeting energy, shipping, crypto, and anti-circumvention. The UK, as has become standard practice since February 2022, is expected to follow with closely mirrored designations. The headline story is one of unity.

But beneath that surface alignment lies a structural vulnerability. The EU and UK coordinate through informal channels — bilateral diplomacy, shared political will — rather than any dedicated mechanism. Each side decides unilaterally what to impose and when. That is a fragile foundation for the most consequential sanctions regime in modern history.

“Cooperation has worked well, but it is built on goodwill, not governance.”

The Illusion of Alignment

Since Russia's war in Ukraine started, the UK has sanctioned 3,280 individuals, entities, and ships, while the EU has sanctioned over 2,700 individuals and entities, with significant overlap in targets. Joint announcements have punctuated the timeline, including coordinated packages in May 2025. The optics of solidarity have been strong. Yet the EU Council's own documentation is candid: each non-EU partner "decides unilaterally which sanctions it will impose." A House of Lords

About the Author

Alina Tratorova is a journalist and correspondent covering Russia for Euro Prospects, with a focus on digital authoritarianism, information control, and Kremlin foreign policy. Her work traces the intersection of geopolitics and civil society, with particular attention to the Russian opposition and the broader consequences of Western policy choices.

inquiry into UK-EU sanctions cooperation found the relationship to be, in the words of EU Ambassador Pedro Serrano, "more regular than structured." Cooperation has worked well, but it is built on goodwill, not governance.

The 20th package itself illustrates the point. A full maritime services ban on Russian crude oil was deferred pending coordination with the G7 and the Price Cap Coalition. When it comes to the most significant decisions, it is the G7 framework, not any EU–UK bilateral mechanism, that provides the coordination infrastructure.

What the G7 Has That the EU–UK Relationship Lacks

On the first anniversary of Russia's invasion, G7 leaders established a joint Enforcement Coordination Mechanism and the REPO Task Force — bodies with defined mandates, regular meetings, and formal decision-making processes. The EU–UK bilateral relationship has none of this. According to FCDO evidence submitted to Parliament, UK-EU coordination consists of "regular, informal



engagement" and participation in broader G7 forums. There is no dedicated EU–UK sanctions dialogue, no joint working group, and no mechanism for advance coordination on new packages.

This matters because the EU and UK share specific challenges the G7 does not address bilaterally: diverging legal definitions, different enforcement agencies, and the complexities of post-Brexit regulatory divergence. RUSI's Centre for Finance and Security has flagged persistent shortcomings in UK enforcement capacity. Without a formal bilateral structure, those gaps accumulate quietly.

The Cost of the Gap

The 20th package reveals how Russia exploits the seams between Western regimes. For the first time, the EU activated its anti-circumvention tool against Kyrgyzstan, designating it as a jurisdiction with systematic circumvention risk for re-routing EU goods to Russia. Transaction bans were imposed on banks in Kyrgyzstan, Laos, and Azerbaijan for connecting Russian institutions to the global financial system, as well as on the Indonesian port of Karimun for facilitating oil price cap evasion. Russia's shadow fleet now numbers 632 listed vessels, operating under obscure flags and moving oil through jurisdictions sitting just outside Western enforcement reach.

The UK, meanwhile, is reforming its own sanctions architecture independently, overhauling the Office of Trade Sanctions Implementation's enforcement powers and expanding its licensing remit on a separate national track. As both sides update their rules on diverging timelines, they risk creating ambiguities that evasion networks will exploit.

For Russian opposition figures and civil society activists who depend on sustained Western pressure, this is not abstract. Every gap in the sanctions architecture is ammunition for the Kremlin's narrative that the West is divided. The 20th package was itself held up for months by a dispute between Hungary, Slovakia, and Ukraine over pipeline flows — a delay that handed the Kremlin a months-long reprieve. The enforcement gap shows up on the water too: while France actively detained two shadow fleet tankers in 2025-2026 (the Boracay and the Grinch, the latter intercepted using British intelligence), the UK authorised Royal

Navy boarding operations in March 2026 but has yet to execute a single one.

Building the Bridge

The solution does not require new treaty negotiations. A dedicated Foreign Policy and Sanctions Coordination annex to the EU–UK Trade and Cooperation Agreement, with a standing working group, an early-warning mechanism for new package development, and a joint enforcement information-sharing protocol, would address the core vulnerability without new treaty negotiations.

Such a mechanism would allow the UK to engage in EU package development at an earlier stage, reducing the current pattern of post-hoc mirroring.

“Russia exploits the seams between Western regimes.”

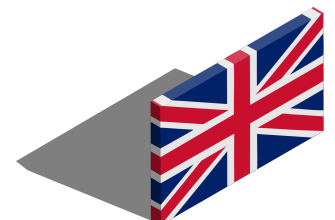
It would create a joint forum to address enforcement divergence before gaps open. And it would provide a dedicated channel

for tackling third-country circumvention — the fastest-growing challenge in the current sanctions environment, as the 20th package's unprecedented anti-circumvention measures make clear.

The Architecture of Resolve

The Western sanctions regime against Russia is, by historical standards, a remarkable achievement. But remarkable achievements can mask structural fragility. The EU and UK are allies without an alliance on sanctions, cooperating closely, but without the institutional backbone to make that cooperation durable.

The 20th package is both a milestone and a warning. Its most significant measure was deferred because unilateral action without G7 backing was deemed too risky. The same logic applies to the EU–UK relationship. Informal coordination is not enough when the adversary is this adaptive and the stakes are this high. For those inside Russia staking their hopes on Western resolve — the opposition activists, the journalists, the civil society figures operating under brutal repression — the question of whether the EU and UK have a formal coordination mechanism is not a bureaucratic detail. It is a question of whether the West means what it says.



Why Post-Brexit Britain Pushes the Balkans Towards the EU

By Valeriy Lukanov

ANALYSIS

*European Transformation and Integration,
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Britain may have left the European Union, but in the Balkans its interests still run parallel to Brussels', as both seek to consolidate a democratic and stable frontier for Europe.

On a sunny evening on Saint George's Day, I was invited to a reception at the British Ambassador's backyard in Tirana on the occasion of his birthday, bringing together Chevening scholarship alumni, defence industry stakeholders and Albanian interlocutors. In a relaxed atmosphere, infused with wine and polite conversation, H.E. Nicholas Abbott spoke about friendship, followed by the Ombudsman of Albania, Endrit Shabani (DPhil Oxon), who reminded us that the value of studying in the UK was to develop new skills, giving Albanians the ability to contribute to their country. Despite the friendly networking environment that British diplomacy facilitated (including the barbecue), it was an implicit demonstration of British ambitions for the region.

"Britain may have left the European Union, but in the Balkans its interests still run parallel to Brussels'."

The message was simple and digestible: we will give you the skills and the assistance, and you will stay home and look after your own backyard.

Historically speaking, the UK's interests in

the Balkans have been primarily about security and, in more recent years, about concerns over migration. On the regional level, the UK's security concerns have been twofold: over Greece and Turkey, specifically in Cyprus, and in the Western Balkans, which are still in a state of prolonged democratic transition, a legacy of the Yugoslav

About the Author

Valeriy Lukanov is a MA student at the College of Europe in Tirana where he is a full Scholarship Recipient of the Regional Cooperation Council. He is also a graduate of the University of Oxford in History and focuses on Policy and Public Affairs, with a penchant for all things Balkan.

Wars in the 1990s. The UK used to station troops in Bosnia under SFOR and EUFOR Althea until 2020 and still continues to station troops as part of KFOR in Kosovo. In recent years, British concerns over illegal migration have provided ground for bilateral diplomacy with states such as Albania to tackle the small-boat crossings in the English Channel, directly in the Western Balkans, by overseeing migration routes in the region.

This reveals an uncomfortable truth about the UK's broader relationship with the EU in the post-Brexit environment. It is that the UK is ruthlessly pursuing its own foreign policy interests in the EU's backyard; it just so happens that, incidentally, similar interests are also pursued by the EU. That foreign policy goal has been the long-term consolidation of democracy across the Balkans as a guarantor for future stability through the empowerment of free democratic societies. Since 2014, the so-called 'Enlargement Fatigue' and its corresponding 'Accession Fatigue' have stalled the European Membership prospect of the Western Balkans. In the decade since, the democratic transition has morphed into democratic backsliding, particularly in states such as Bosnia, Serbia, Albania, and Kosovo, where indicators such as the Reporters Without Borders World Press Freedom Index show a clear trend of media freedom regression, especially seen under Prime Minister Edi Rama of Albania and President Aleksandar Vučić of Serbia since they took





power in their respective countries. Given the reluctance of local political elites to democratise power, and given indicator trends that

suggest that democracy is on the back foot, European actors need to bolster the resilience of domestic actors such as Civil society organisations to organise better as an internal opposition to authoritarian tendencies. The democratisation of the 1990s never materialised a consolidated democratic society, which is necessary for a participatory democracy, and while efforts need to be home-grown, regional countries need help through initiatives such as Chevening to foster pro-democracy-thinking young people who could challenge current trends.

The main platform that has acted as a springboard for regional stability has been the German-launched Berlin Process in 2014, with a focus on fostering cooperation and reconciliation in the region. Yet, after the 2016 referendum, the UK's role as a participant in the Berlin Process has been seen as ironic by some because it promotes membership of an intra-governmental body that it was bound to leave. However, this ignores the UK's own position in the EU, as the UK was traditionally a strong advocate for enlargement policy because that would make the integration aspect of the EU more difficult, thus preventing the deepening of the European project, which the UK opposed. As such, UK foreign policy focus only increased in the Western Balkans post-Brexit as part of the Global Britain strategy to promote security through democratic values.

The UK has hosted two Berlin Process Summits, the 2018 London Summit and the 2025 London Summit, including the Hillsborough Castle Foreign Ministers' Meeting, issuing joint declarations that affirm regional cooperation. In 2018, the agenda focused on Pros-



perity and Connectivity, Regional Cooperation and Security; seven years later in 2025 the Summit Agenda followed a similar trajectory, Economic Growth and Prosperity, Security and Bilateral Issues and Good- Neighbourly Relations. This shows continuity of the focus of British diplomacy towards the Western Balkans, working together on the EU level, the regional level, and the bilateral level through the instrument of the Berlin Process to pursue its national interests.

Reflecting back on the reception soirée in Tirana, it was obvious that on the bilateral level, British diplomacy flexed its soft power through the provision of the Chevening scholarships, while implying that they were a long-term investment for democratic stability in Albania, thus bolstering broader regional security. Similarly, after having visited Europe Houses across the region in Belgrade, Sarajevo, and Tirana, it is equally evident that the EU has similar goals. The consolidation of democracy through the rule of law reforms and eventual EU accession would make the historic possibility of a new Balkan war a relic of the past. This would benefit both the EU and the UK by securing a historically unstable region in Europe, incorporating it firmly within the democratic governance framework in an integrated continent.



“The consolidation of democracy through rule-of-law reforms and eventual EU accession would make the historic possibility of a new Balkan war a relic of the past.”

This shows that when it boils down to core issues of joint interests, such as security in the Balkans, the UK and EU can work together through

joint instruments such as the Berlin Process to pursue their political interests. In a world where Russia and China are increasing their influence in the Balkans, it is crucial that the UK-EU relationship continues to collaborate to consolidate democracy in the region in the face of creeping authoritarianism. Failure to do so would not only undermine EU credibility, but it would also present the UK as a weak facilitator of security, further destabilising a region infamous for its instability.

Under the Sea: Scotland and the Hidden Frontline of European Security

By Henry Phelan

ANALYSIS

International Relations, University of St Andrews

Scotland generates a quarter of Europe's offshore wind and tidal energy, yet sits outside the EU's collective security framework. As Russia targets subsea infrastructure across the North Sea, the continent's most energy-rich corner has no seat at the table.

Below the Surface

If I were to ask you where the frontlines of European security lie, where would you say? Perhaps on the Eastern border of Ukraine? Maybe somewhere in the Middle East? What if I were to tell you that these frontlines are not determined by borders? They, in fact, lie underwater in European seas.

Russia is mapping out and, allegedly, attacking Europe's subsea infrastructure: In September 2022, three out of four Nord Stream pipelines in the Baltic Sea were sabotaged, rendering them inoperable. Since 2023, dozens more have been damaged. While it has long been assumed that Russia's "shadow fleet" existed primarily to evade sanctions, there is growing reason to see these ships as part of a deliberate sabotage campaign. The fleet's hazy registration and insurance documentation lend plausible deniability to what European authorities increasingly suspect are efforts to undermine net zero initiatives in Eastern Europe and force other countries to resume hydrocarbon imports from Moscow.

About the Author

Henry Phelan is a student of International Relations at the University of St Andrews, from Edinburgh, Scotland.

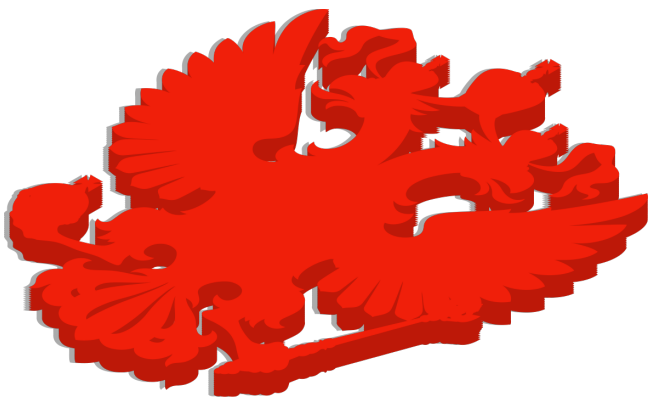
As the continent with the most subsea connections in the world, Europe is dangerously vulnerable. Two-thirds of Europe's international data flows pass through submarine cables, and its limited repair capacity leaves the continent open to damage that is long-lasting and devastating. The North Sea, dubbed the "battery of Europe", is gradually becoming the backdrop for this contest. Scottish wind farms, tidal power stations, and subsea cables that carry power and data across the continent are, as security analysts have warned, increasingly attractive targets for Russian sabotage.

The North Sea is not just a cold body of water; it is of huge geopolitical importance. Its protection is of paramount importance in increasing European energy security. The EU's collective security response must be swift. Yet on either side of the Norway-UK median line exist two countries, Norway and Scotland, which are not in the EU. This article examines what Scotland's position outside the EU, despite its desperate desire to be in, means for the continent's collective security response to the threat of Russia.

“Scotland generates 25% of Europe's offshore wind and tidal energy, yet has no seat at the table where European energy policy is decided.”

Power Without a Seat

No doubt, Scotland is a renewable energy superpower. Home to around 800 islands and 16,500km of coastline, Scotland is in a prime position to utilise wave and tidal resources for energy production. Currently, 25% of Europe's offshore wind power and tidal energy is generated by Scotland: one of the world's largest tidal turbine collections is in Scottish territorial waters, near the island of Stroma, and, in 2019, it generated enough energy to power 4,000 homes. With a legally binding net-zero target set for 2045, Scot-



land is harnessing the waves and the winds that have been indifferently flowing and blowing for long before anyone thought of turning them into electricity.

After Russia invaded Ukraine, the EU scrambled in its search for alternatives to Moscovian hydrocarbons. Europe's main strategic vulnerability has been this dependence, which Russia has consistently and successfully leveraged. Its main strategic vulnerability. Scotland, with its massive energy potential and position in the North Sea, serves as a natural solution to this weakness. Yet, through no fault of its own, it is not in the room where European energy policy is being decided and has not been since 31 January 2020.

The Structural Problem

The main structural awkwardness is that renewable energy infrastructure (current and future) is in Scotland, and Scotland has no direct voice in the EU. Diplomatic rewards such as Scotland House Brussels, while a step in the right direction for a closer Scot-European connection, mostly serve as consolation prizes for a country whose population voted 62% in favour of remaining in the EU yet was dragged out regardless.

Scotland in the EU, be it independent or not, would change this problem. Scotland's energy resources, territorial waters, and maritime security responsibilities would fall under the EU's collaborative framework. Initiatives by the EU, such as its 2025 Cable Security action plan, would cover the North Sea as well as the Baltic Sea and help to strengthen the European continent's strategic positioning. The complexity of maritime law means collective responses are more necessary than ever,

yet Scotland's existence outside of the EU makes security integration in the North Sea infinitely more difficult.

The feasibility of Scottish-EU energy cooperation is worth pausing on. Currently, Scotland exports its surplus electricity into the integrated GB grid, regulated by Ofgem under a single set of standards and network codes established by the 2005 British Electricity Trading and Transmission Arrangements. However, there is currently no direct connection between Scotland's electricity network and mainland Europe – it goes through England. Efforts to bridge this gap have so far been unsuccessful: in 2023, a proposed interconnector between Peterhead in Aberdeenshire and Norway's grid was rejected by the Norwegian government in 2023 due to domestic energy price concerns. For

Scotland to route power toward European markets at scale, it would need to maintain deep alignment with the rest of the UK or construct new interconnector infrastructure. Both options, unfortunately, involve complex negotiations.

However, EU initiatives, such as their Project of Common Interest framework and collective investment in infrastructure, mean that membership would significantly improve Scotland's options here.

A Two-Way Street

There is a commonly held notion that an independent Scotland would be a net negative for British security. Yet, the breakup of the Union would in fact yield mutual benefits for its constituent nations. Scotland has been a net exporter of energy for decades, and England has reaped the benefits from this due to the UK's deeply integrated energy markets. An independent Scotland inside the EU would attract investment that could fund infrastructure programmes such as hydrogen production, offshore grid connectors, and smart energy networks, subsequently generating increased energy security for the entirety of the British Isles.

But, for the rest of the UK to benefit, Scotland would have to maintain market integration post-independence. And, for an independent Scotland to maintain market integration, it would have to align its standards, regulations, and network codes with the rest of the UK. Westminster's response

“The Kremlin does not factor into its military tactics whether or not it is the right time for Scottish independence.”



has been to insist that the single market “just could not continue in its current form” and, according to English politicians, “split[ting] that up [would cause] all those benefits [to] go” – yet we have to take this with a grain of salt. Westminster governments time and time again framed Scottish Independence as economically and constitutionally impractical as part of a strategy dubbed ‘Project Fear’ by campaign officials – a strategy designed to preserve the Union by ensuring a ‘Yes’ vote in 2014 based on an apocalyptic scenario of Scottish Independence. The closest precedent is the Integrated Single Electricity Market on the Island of Ireland, where trade continues despite separate national energy policies. A comparable arrangement for Independent Scotland is feasible. Whether Westminster chooses to make it easy is a different question.

In terms of the EU, there is no “fast-track” to re-joining. Scotland would still need to face the legal realities of the acquis communautaire and fulfil the treaty requirements before being granted membership. The path is long – however, the direction that Scotland is taking is becoming increasingly clear. Just last year, First Minister John Swinney unveiled a renewed independence strategy following new polling that indicated significant support across Europe for Scotland rejoining the EU. Despite the UK as a whole voting for Brexit, Scotland might just be the willing partner that European policymakers are looking for to help them reach a collective energy security response.

Security Has No Borders

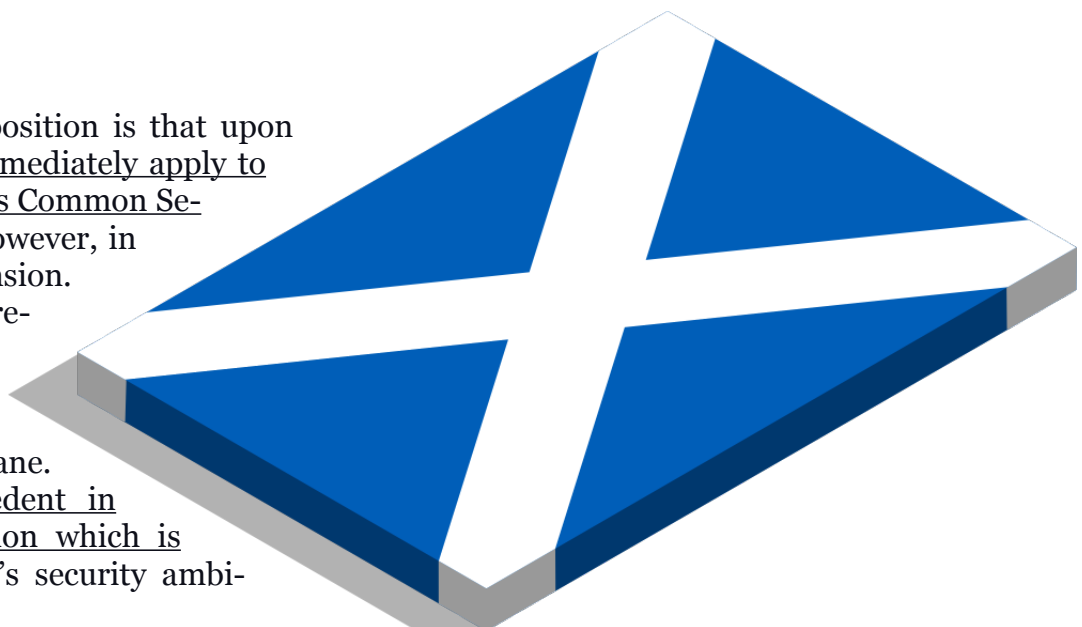
The Scottish Government’s position is that upon secession, Scotland would immediately apply to NATO and commit to the EU’s Common Security and Defence Policy. However, in practice, this runs into a tension. The SNP has committed to removing nuclear weapons from Scottish soil, requiring the UK to relocate its Trident submarines from Faslane. This demand has no precedent in NATO history, an organisation which is nuclear at its core. Scotland’s security ambi-

tions and constitutional commitments are, therefore, a little complicated.

However, none of this makes the case against independence on the grounds of energy security. The cables and turbines in the North Sea remain Scottish. Yet institutional arrangements remain vital to integrating and protecting Scottish renewable energy. Keeping the most energy-rich corner of the continent outside the EU’s collective security architecture is a peculiar choice, strategy-wise. Scotland may not get to vote on its constitutional

“Scotland might just be the willing partner that European policymakers are looking for to help them reach a collective energy security response.”

future soon, but the face of European security is changing fast, no matter what Wes Streeting or Kier Starmer says. The cables, the turbines, and the cold water they are submerged in are under threat, and the Kremlin does not factor into its military tactics whether or not it is the “right time” for Scottish independence.



Brexit and The Cost of Losing the European Investigation Order

By Michela Sinardi

ANALYSIS

Criminal Justice Correspondent, Euro Prospects

Brexit has cost the UK access to the European Investigation Order, and with it, the speed and precision that made cross-border criminal cooperation effective. The Mutual Legal Assistance framework that replaced it is slower, more bureaucratic, and harder to coordinate.

The United Kingdom's withdrawal from the European Union has fundamentally reshaped the architecture governing cross-border criminal investigations. Among the most consequential changes is the loss of access to the European Investigation Order (EIO), a mutual recognition instrument that enabled swift, standardised, and judicially driven evidence gathering across Member States. In its place, EU–UK cooperation now relies on Mutual Legal Assistance (MLA) under the Trade and Cooperation Agreement (TCA), a more formal and slower system.

“Slower cooperation can mean delayed justice for victims, giving organised criminals more time to move money, destroy evidence, or avoid prosecution.”

This shift matters beyond legal technicalities. Slower cooperation can mean delayed justice for victims, and it can give organised criminals more time to move money, destroy evidence, or avoid prosecution. In short, the efficiency of cross-border cooperation has real consequences for how effectively crime is investigated and prosecuted.

About the Author

Michela holds a Bachelor's degree in International Affairs and is completing her Master of Science in Crime and Criminal Justice. Her academic and professional interests focus on European criminal justice systems, cross-border crime, and the intersection of security policies with human rights protections.

This article argues that the replacement of the EIO with MLA represents not merely a procedural downgrade but a structural transformation with tangible operational consequences. Drawing on institutional reporting and practitioner-informed scenarios, it shows how the shift has introduced delays, increased formalism, and weakened direct judicial interaction. These effects are particularly visible in time-sensitive investigations such as financial crime and cyber-enabled offences. The article concludes by considering whether upcoming reforms under the TCA review could improve the current system.

Brexit and the Reconfiguration of Criminal Cooperation

Cross-border evidence gathering is no longer an exceptional feature of criminal investigations; it represents its defining operational baseline. Financial transactions move across countries in seconds, data is stored across multiple jurisdictions, and organised crime groups operate internationally by default. In this context, effective cooperation between countries is essential.

Prior to Brexit, the United Kingdom operated within an EU framework designed to minimise friction in precisely these scenarios. The European Investigation Order (EIO), established under Directive 2014/41/EU, was central to this system. It provided a single, standardised mechanism through which judicial authorities could request investigative measures across Member States, supported by binding

deadlines, limited grounds for refusal, and direct judicial communication.

Since 2021, this model has been replaced by Mutual Legal Assistance (MLA) under the Trade and Cooperation Agreement (TCA). While cooperation still exists, it now follows a different logic, one that prioritises national procedures and formal processes rather than speed and standardisation. Its real significance, however, lies in how it reshapes the day-to-day functioning of investigations. The move from EIO to MLA alters not only the legal basis of cooperation but also raises the key issue of whether it still works quickly enough to keep up with modern crime.

The EIO as an Operational Benchmark

The EIO was designed to simplify and accelerate cross-border evidence gathering. Requests followed a standard format, were transmitted directly between judicial authorities, and were subject to structured deadlines, typically 30 days to recognise and 90 days to execute. Just as important, authorities could communicate directly with each other instead of going through central government bodies. This not only accelerated procedures but also fostered professional trust and informal problem-solving between practitioners.

Operationally, this meant investigators could act fast. In a cross-border money laundering investigation, for example, UK authorities could issue

“The issue is not the absence of cooperation, but its reduced efficiency and predictability.”

parallel EIOs to multiple Member States to obtain banking information, trace assets, and coordinate freezing measures within relatively predictable timeframes. Similarly, in cybercrime cases, where digital evidence may be volatile, the ability to request rapid preservation and access to data significantly reduces the risk of it being deleted or moved.

The EIO was not frictionless by any means, but it provided a level of speed and coordination that reflected a broader framework built on trust between EU countries.

Post-Brexit Framework: The Operational Consequences of MLA Procedures

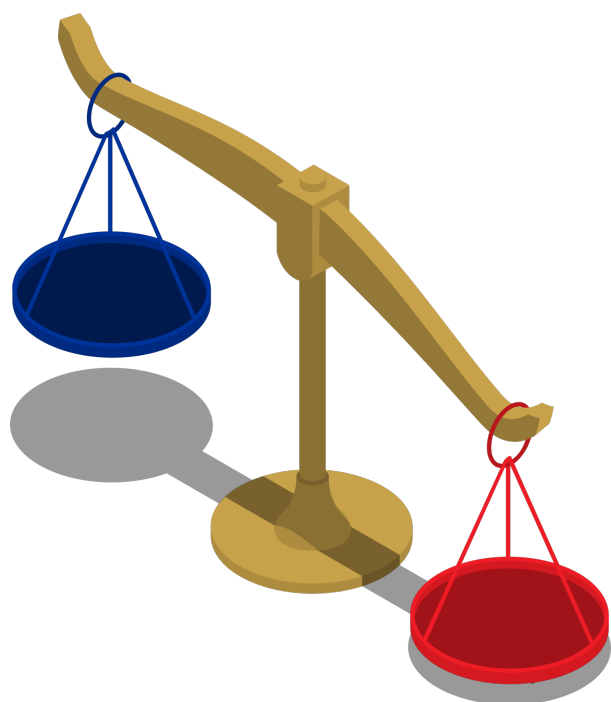
The post-Brexit framework marks a clear departure from this model. Cooperation on evidence gathering now relies primarily on MLA under the TCA. Requests now go through central authorities, require more detailed documentation, and must comply with each country’s legal system.

Unlike the EIO, MLA procedures are not governed by common deadlines. This means requests can take very different amounts of time depending on the country and the complexity of the case, often involving translation, certification, and detailed evidentiary thresholds.

This shift has several practical implications. First, timeframes become less predictable. Without structured deadlines, similar requests may take significantly different amounts of time depending on the jurisdiction and administrative workload. Second, procedural burdens increase. Requests must be tailored to national systems, raising the likelihood of incomplete applications and delays. Third, coordination becomes more complex. Parallel requests across multiple jurisdictions may progress at different speeds, complicating investigative strategy.

The impact of this shift becomes most visible in complex investigations and coercive measures (arrests, seizures, searches, travel bans) where timing is critical.

Financial Crime and Asset Tracing



In money laundering cases, delays can directly undermine enforcement. Illicit funds can be moved across jurisdictions in a matter of hours. Under the EIO, authorities could obtain banking information within predictable timeframes. Under MLA, delays in accessing account data, whether due to administrative backlog or procedural requirements, may allow funds to be dissipated before action is taken. Even modest delays can therefore have disproportionate consequences.

Cybercrime and Digital Evidence

Digital evidence presents a different but equally pressing challenge, as it is inherently fragile within its make-up. Data may be deleted, overwritten, or relocated quickly. In a scenario where UK investigators seek subscriber information or server logs from an EU Member State, the absence of rapid and standardised procedures increases the risk that evidence is no longer available by the time a request is executed.

Organised Crime Investigations

Complex investigations involving surveillance, coordinated searches, and witness hearings rely heavily on timing. Under the EIO, the ability to align investigative measures across jurisdictions supported more effective operational planning. Under MLA, divergent timelines and procedural hurdles can disrupt coordination, potentially compromising the effectiveness of operations.

Across these scenarios, the issue is not the absence of cooperation, but its reduced efficiency and predictability. Investigations become slower, more resource-intensive, and more difficult to coordinate. This reflects a broader trade-off. While politically significant, this shift carries operational costs that are now increasingly visible.

2026 TCA Review: Realistic Prospects for Reform

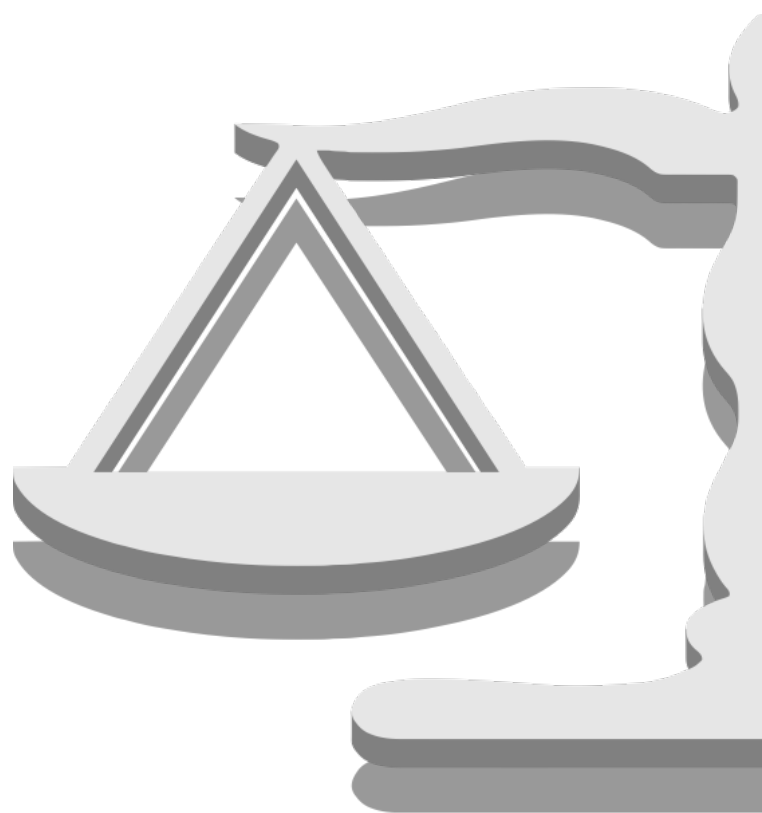
The upcoming review of the Trade and Cooperation Agreement provides an opportunity to address some of these challenges, but structural limits remain. Full reintegration into mutual recognition (and the previous EU framework) is unlikely.

Nevertheless, improvements are indeed feasible. One avenue is the introduction of more structured timelines for MLA requests to improve predictability. Another is the development of standardised procedures and better use of digital tools

to manage existing cooperation. Such measures would not entirely replicate the EIO, but they could reduce inefficiencies.

All in all, the loss of the European Investigation Order has reshaped EU–UK criminal cooperation in practical terms. Cooperation still exists, but it no longer operates with the same speed or efficiency. In cases where time matters, this can directly affect outcomes.

The challenge now is not to reverse Brexit, but to make the current system work better. As cross-border crime continues to evolve, the effectiveness of cooperation between the UK and the EU will depend on how well these gaps are addressed.



Erasmus+ Is Back. The Question Is Whether Britain Is.

By Mistral Zerbi

COMMENTARY

Philosophy, University of St Andrews

The UK's return to Erasmus+ from 2027 is a step forward, but only in one direction. European students still face international fees and a shortened post-study visa. A generation that didn't vote for Brexit continues to bear its consequences.

There is a certain sort of political announcement designed to feel like a resolution. In philosophy, we call it *sophistry*.

Recently, the UK confirmed its association with Erasmus+ from 2027. It is great news. British students will once again be able to study at European universities under domestic tuition rates, supported by living cost grants funded by a £570 million UK contribution. For a generation that grew up watching those doors close one by one after Brexit, this is definitely something.

But is it enough?

A Door Half Open

The UK was part of Erasmus+ from 2014 until it was shut out as a result of Brexit in 2020. For those six years—and through predecessor programmes prior—the scheme did what the best policies do: it served the country's youth. It funded international placements and partnership projects across education, training, and sport. It gave students—European and British—the chance to study, work, travel and build themselves in other countries. It was in the most straightforward sense an open door.

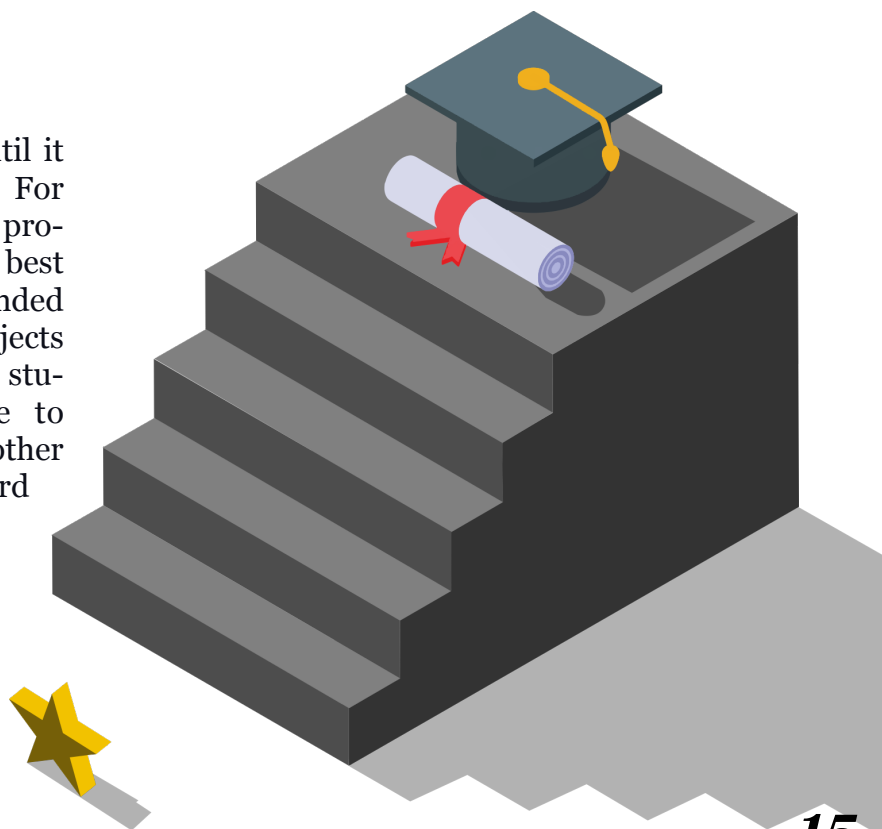
For years, this ran both ways. But since 2021, Britain has been steadily closing its half of the door.

Consider what was actually lost. Before Brexit, around 30,000 European stu-

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dents came to the UK each year—most of them on Erasmus placements, studying here for a semester or a year as part of their degree. Then, after the 2021 intake, European students were reclassified. Overnight, they became international students—the same category as applicants from the United States, Australia, or Asia. Visas became mandatory. Tuition fees, previously capped at home rates, roughly quadrupled for EU students. Add to this the UK's Graduate Route reduction: From January 2027, post-study visa duration for undergraduate and postgraduate taught students drops from two years to 18 months.



If the new fee structure left any doubts about Britain's waning appetite for international students, this latest change certainly eradicates them.

For an American student, UK tuition at £30,000 is a relative bargain. An average American university costs around \$50,000 a year; the elite ones approach \$100,000. Oxford, Cambridge, St Andrews—world-class institutions, at roughly a third of the American price. For a young American looking for an international experience, Britain remains an extremely attractive option.

But for a young European? The arithmetic runs the other way entirely. Why spend £30,000 a year in the UK when world-class education at home is either free or very near to free? In addition to fees, we have barely 18 months to find a job afterwards, possibly requiring one that sponsors our visas, too. In this economy? Thousands of young Europeans who might have studied here, built friendships here, and carried those connections into their professional lives simply stopped coming. Not because Britain stopped mattering, but because the price of mattering became far too high. Speaking as an Italian who grew up attending English summer programmes in Bournemouth and Cambridge—and spent years imagining a UK university and a London career—that path once felt incredibly desirable. Since 2024, the year the first post-Brexit European cohort graduated, it has become neither accessible nor worth the cost for most young Europeans.

And yet, despite the UK's attempt to cold-shoulder international students, they undeniably represent a massive portion of income for UK universities, generating about a quarter of their total revenue. Based on data leading up to the 2019/20 academic year, EU students made up a significant portion of the international student body in the UK, generally representing roughly 5–7% of the total student population (including domestic students) and a much higher share of non-UK students. More specifically, there were over 140,000 students from EU countries studying in UK higher education institutions that year.

Brexit changed the terms of an intellectual and scholarly partnership that had been building for

decades, one based on student exchange, research partnership, and shared campus friendships. That kind of accumulated trust is harder to quantify than a visa fee—and much harder to restore.

“The people bearing the cost of that decision are, with dispiriting consistency, those who had the least say in making it.”

Which is why the details buried inside the Erasmus+ announcement deserve more attention than they have received. The government has been clear about what British students going abroad will receive. It has said almost nothing about what European students coming

inward can expect. Will EU students on Erasmus placements pay domestic fees? Will there be new scholarship schemes for those pursuing full degrees in Britain? None of it has been confirmed or outlined. The deal as currently announced is generous in one direction and largely coy in the other.

If European students still face international fees for anything beyond a short placement, then what has actually changed? Erasmus+ becomes a programme that opens Britain to Europe without meaningfully reopening Europe to Britain. The 73% of 18 to 24 year olds who voted to Remain in 2016 were overruled by a generation that had itself benefited from decades of free movement and European integration, and then voted to remove that possibility for everyone who came after. The people bearing the cost of that decision are, with dispiriting consistency, those who had the least say in making it.

The Other Side of the Coin

By now, some of you might think: why should the UK worry about this? Did Europe not draw the short straw? Some Britons certainly think so, but this view is short-sighted. A lack of reciprocity rarely leads to any positive outcomes in the long run. In fact, recent developments already hint at some consequences.

At the other end of the policy spectrum, a British woman named Emma Hamilton was ordered to leave France last March. She had moved to the village of Pionnat in Creuse—joining her husband Andrew, who had already established a consulting business in the years prior—and set up a small jewellery and clothing enterprise of her own. When her business failed to generate sufficient income in its first year, French authorities issued

her an OQTF (*Obligation de Quitter le Territoire Français*): an obligation to leave French territory. Her husband, whose business met the income threshold, was not targeted.

The mayor of Pionnat, Laurent Piolé, accompanied her to the prefecture personally, organised a community information meeting, and launched a petition that gathered over 200 signatures in the two days preceding Emma's decision to depart. The prefecture's position was unambiguous: her visa was "very specific," and they could only account for the declared revenues from the business activity for which she had come to France. The household income did not count—only hers.

The mayor himself was baffled. "We found it surprising that only the wife was targeted," he said. He also noted what any small business owner already knows: that a new enterprise—particularly one selling handmade jewellery and clothing at local markets—takes time to establish. The chamber of commerce told him it could take up to three years to become profitable. The couple had sold everything in the UK. They owned their home in Pionnat. They attended local events, helped at New Year ceremonies, and came to the Monday language sessions every week.

None of it was enough.

Emma Hamilton left France and began the process of applying to return to England. Her village, for its part, is waiting for her.

While this might just be an isolated case to some, I can't help but wonder whether this is just one of the many instances of a much larger problem. Before Brexit, this would not have been a legal crisis. It would have been a difficult first year. Under free movement, income thresholds and visa categories did not govern whether a British citizen could remain in the French countryside with her husband. The bureaucratic machinery that expelled her is the same machinery that Brexit made inevitable for British people in Europe, just as it did for European people in Britain.

Is this the EU deciding to give the UK a taste of its own medicine? Perhaps. The symmetry is uncomfortable either way. A country that reclassified 130,000 European students as international strangers cannot be entirely sur-

prised when its own citizens start experiencing the consequences of that logic applied in reverse.

This is the world Brexit built. Not a dramatic overnight rupture of campaign rhetoric, but something slightly more insidious. A closed world. For a generation that didn't even vote for it.

Rejoining Erasmus+ is a step forward—nobody would deny that. But a step is only meaningful if it leads somewhere, and right now, the government has not explained where it intends to go. On one hand, we have Erasmus+ 2027; on the other, we have the 2027 18-month Graduate Visa.

Young people across Europe and Britain deserve a government willing to ask the harder questions. Not just how do we get our students into European universities, but how do we make Britain worth coming to again? That means answers to fees. It means clarity on scholarships. It means treating this not as a political win to be announced, but as an obligation to a generation that was promised a more open world. What does reciprocity actually look like? Reciprocity is the only mechanism that ensures what is built today will still be standing tomorrow.

“Reciprocity is the only mechanism that ensures what is built today will still be standing tomorrow.”



The Missing Link: The Case for EU–UK Critical Minerals Cooperation

By Vikrant Singh

ANALYSIS

Common Future Conversations, Chatham House

More than four years after the Russian invasion of Ukraine, Europe has undergone a structural shift in how it thinks about strategic dependency. Having successfully reduced its reliance on Russian energy, the continent now faces a more complex challenge: securing the critical minerals that underpin its renewable future. Both the European Union and the United Kingdom share this vulnerability, yet neither has fully recognized that the answer may lie in cooperation with the other.

From Moscow to Beijing

In 2021, Russia accounted for roughly 40 to 45 percent of the European Union's imported natural gas. It also supplied about 27 percent of crude oil imports and nearly 46 percent of coal. By 2023 to 2024, those figures had collapsed. Russian gas fell to around 8 percent of EU imports, while oil dropped to roughly 2 percent, with residual flows largely confined to more Russia-friendly member states such as Hungary and Slovakia.

To compensate, the European Union diversified its energy sourcing. Supplies from Qatar, Algeria, and the United States increased significantly. At the same time, Europe accelerated its transition toward renewable energy. By 2023, wind and solar together generated about 27 percent of EU electricity. By 2024, that figure rose to roughly 30 percent, overtaking fossil fuels in the power sector for the first time. Countries such as Denmark, where renewables account for more than 70 percent of electricity, and Germany, at around 45 percent, illustrate the pace of this transformation.

Yet this transition exposes an uncomfortable paradox. If Europe is moving away from Russian fossil fuels, it must source the materials needed for its renewable future, and that answer lies overwhelmingly in China. In shifting its energy dependence from Moscow to Beijing, Europe has not escaped strategic vulnerability. It has merely changed its landlord.

China supplies approximately 98 percent of the EU's rare earth imports and dominates the processing of critical minerals such as graphite and lithium, which are essential for wind turbines, solar panels, and battery storage. Between 80 and 90 percent of solar panels installed across the EU are manufactured by Chinese firms, and Beijing commands a significant share of the global wind turbine supply chain.

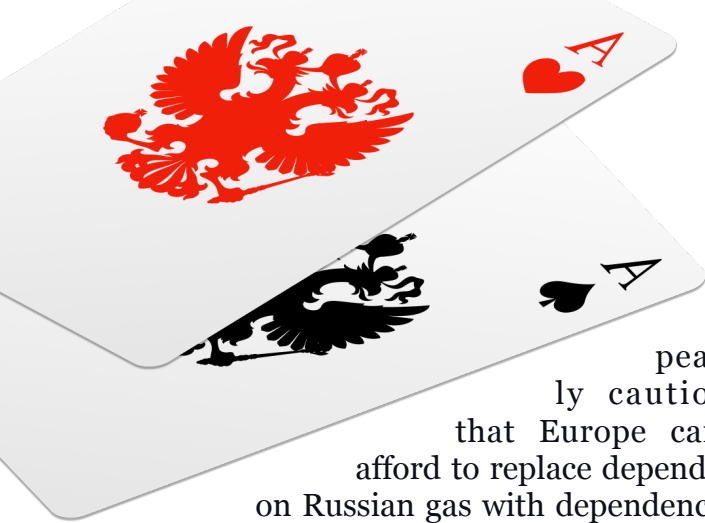
The result is a strategic substitution rather than full autonomy. Europe has swapped one form of external dependency for another, reducing its exposure to Russian hydrocarbons while deepening its reliance on Chinese-controlled supply chains for the technologies underpinning its energy transition. The distinction matters because China and Russia are not separate problems. Since the invasion of Ukraine, Beijing has deepened its economic and diplomatic support for Moscow, meaning that Europe's new dependency feeds, however indirectly, into the same geopolitical axis it sought to escape.

Europe Wakes Up

It is not as though Europe is unaware of its growing dependence on China. European leaders have, in effect, woken up to the risks. European Commission President Ursula von der Leyen has re-

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peatedly cautioned that Europe cannot afford to replace dependence on Russian gas with dependence on

Chinese solar panels and batteries. Emmanuel Macron has been equally blunt, warning that Beijing's economic posture runs counter to European interests and urging a rebalancing of trade. In recent months, he has sharpened his critique, highlighting Europe's excessive reliance on Chinese exports of rare earth elements and related technologies. Beyond trade, the risks are strategic. A China that can restrict rare earth exports at will holds genuine leverage over European defense manufacturing, clean energy deployment, and long-term industrial capacity.

“The missing piece is not mineral deposits—it is the industrial capacity to transform them.”

Events in 2025 reinforced these concerns. In April, China placed seven medium and heavy-rare-earth elements, including terbium, dysprosium, and samarium, under export controls. By October, a second round expanded restrictions to additional elements such as holmium, erbium, thulium, europium, and ytterbium, while also tightening oversight on rare earth-based products, equipment, and technical know-how. These materials are indispensable for the production of high-performance permanent magnets used in wind turbines, electric vehicles, and advanced defense systems. The message was clear. Supply chains could be weaponized.

Europe's response has been to pursue a strategy of de-risking rather than outright decoupling. The EU has moved to secure alternative sources of critical minerals through a network of strategic partnerships. Agreements and memoranda of understanding have been concluded or advanced with countries such as Australia, Canada, Chile, and Argentina, focusing on lithium, nickel, cobalt, and rare earth projects that are essential not only for clean energy technologies but also for semiconductors, advanced electronics, and defense manu-

facturing. Additional outreach has extended to Brazil, Kazakhstan, and Uzbekistan, reflecting a broad effort to diversify sourcing across multiple geographies.

Financial backing has followed strategy. The European Investment Bank Group has committed around €100 billion (£86.5) to support key priorities, including green energy, critical raw materials, defense, and digital infrastructure. Roughly 60 percent of its lending is directed toward climate and environmental projects such as wind, solar, grid expansion, and energy efficiency. In 2025 alone, approximately €33 billion was allocated to clean energy, while energy security-related investments, including grid resilience, storage, and supply diversification, accounted for about €11.6 billion.

Yet a structural vulnerability remains. Securing raw materials is only one part of the equation. Processing capacity, where the real value and strategic leverage lie, remains overwhelmingly concentrated in China. More than 90 percent of global rare earth processing still takes place there. The missing piece is not mineral deposits—it is the industrial capacity to transform them, and that capacity exists closer to Europe than Brussels has yet acknowledged.

Britain's Hidden Asset

A more complete answer to Europe's strategic dilemma lies closer to home. The European Union has a natural partner in the United Kingdom, a former member of the bloc whose industrial capabilities could help close critical gaps in the supply chain. Yet London's response to securing access to rare earth elements has, so far, been cautious and limited in scope.

The United Kingdom's Vision 2035, backed by a £50 million fund, reflects an awareness of the challenge but lacks the scale and institutional depth seen in Brussels. The absence of price support mechanisms and long-term industrial policy raises questions about whether the effort can match the urgency of the moment.

What the UK does possess, however, is something the European Union cannot easily replicate within its own borders. It has emerging midstream pro-

cessing capacity, particularly in Ellesmere Port and parts of Wales. This segment of the supply chain is critical. Midstream processing transforms raw rare earth concentrates into usable oxides, metals, and alloys, the essential inputs for advanced manufacturing.

These facilities serve three strategic functions. First, they convert imported concentrates into refined materials that can be used in high-performance applications. Second, they enable the recycling of end-of-life rare earth magnets, turning scrap into high-grade oxides that can re-enter the production cycle. Third, they create a non-Chinese processing node that can integrate supply from multiple partners, including Australia, Brazil, Canada, and resource-rich regions in Africa.

The development of such capacity has broader implications. By producing magnet-grade alloys and metals within Europe's wider economic orbit, the United Kingdom can support wind turbine manufacturers, electric vehicle producers, and defense industries without relying on Chinese-dominated processing chains. If aligned with the European Union's strategy, this emerging ecosystem could form the backbone of a more resilient and diversified rare earth supply network.

The Logic Is There. The Politics Are Not.

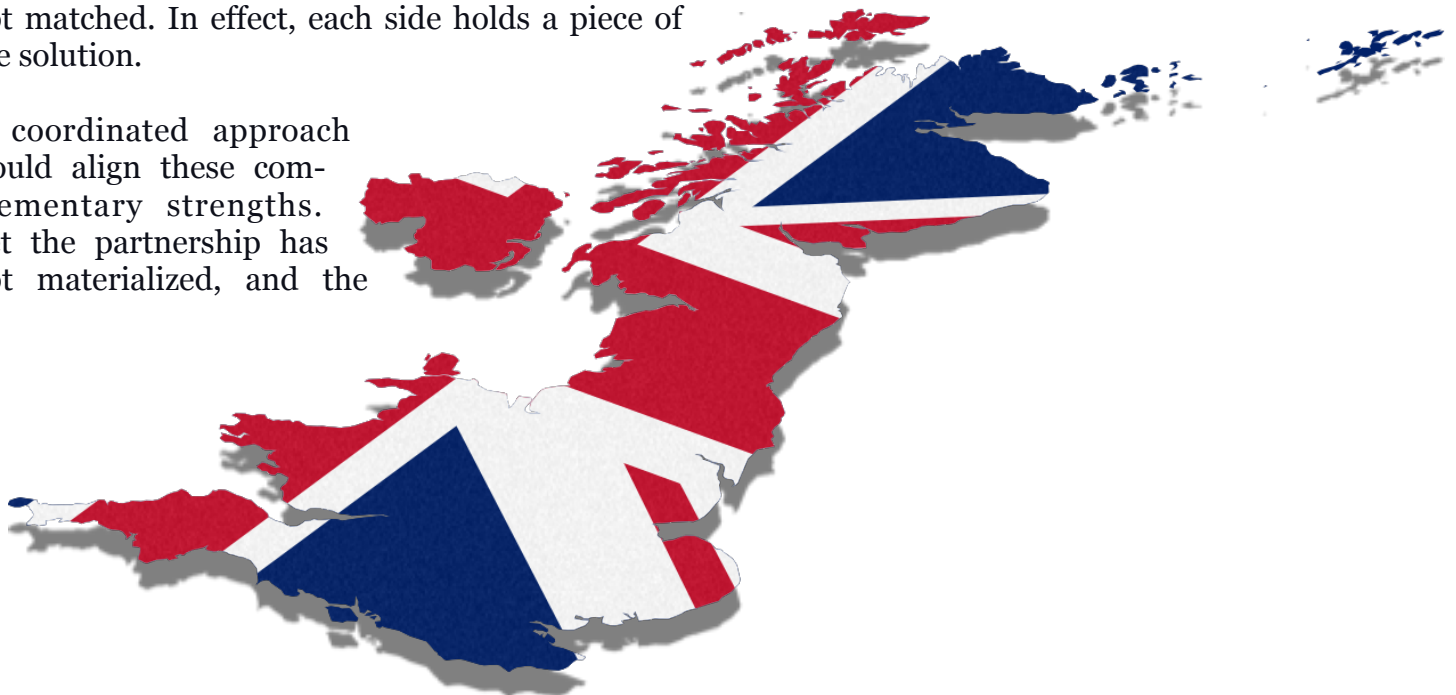
The United Kingdom possesses midstream processing capabilities that the European Union currently lacks, particularly in refining and recycling rare earth materials. At the same time, the European Union has committed capital and built upstream partnerships to secure access to critical minerals on a scale that the United Kingdom has not matched. In effect, each side holds a piece of the solution.

A coordinated approach would align these complementary strengths. Yet the partnership has not materialized, and the

reasons are not difficult to identify. Brexit created regulatory divergence and political friction that have made structured industrial cooperation between London and Brussels harder to initiate. Trade negotiations remain incomplete, mutual suspicion lingers at the institutional level, and neither side has yet framed critical minerals as a domain where post-Brexit pragmatism should override political grievance. By integrating European sourcing power with British processing capacity, a more resilient and autonomous supply chain could begin to take shape. Such cooperation would not eliminate dependence overnight, but it would mark a decisive step toward reducing Europe's exposure to Chinese dominance in critical technologies.

The logic is straightforward. The challenge lies in politics. Whether strategic necessity can overcome the lingering frictions of Brexit will determine if this opportunity is realized.

“The logic is straightforward. The challenge lies in politics.”



A Third Way? Lessons from the UK-EU Data Governance for the Global South

By Anant Mishra

ANALYSIS

*Marie Skłodowska-Curie Research Fellow,
University of South Wales*

As Washington and Beijing reshape global digital governance, the UK and EU are sitting on an untapped strategic opportunity. Their shared adequacy framework could become a third path for the Global South – if both sides stop treating it as a damage-limitation exercise.

A Fragile Foundation

Brexit did more than redraw borders, it put every data transfer between the UK and the EU on borrowed time. The mutual adequacy framework gave both the UK and the EU a shared data bridge, built with GDPR-compatible standards, representing a functional structure whose stability continues to face scrutiny. The Schrems II decision by the EU Court of Justice rewrote the rules: an adequacy framework (where the EU formally recognises that a third country's data protection standards are equivalent to its own) became conditional. The very moment a third country's national security framework (surveillance laws, intelligence collection legislation and intelligence sharing protocols) conflicts with the EU's fundamental rights framework (particularly Article 7 and Article 8 of the Charter), the adequacy can be withdrawn overnight. The UK's domestic surveillance and data retention legislation already sits in an uneasy tension with the EU's fundamental rights norms. The UK Data (Use and Access) Act 2025 has widened this gap, indicating that Westminster would prioritise domestic policy over regulatory convergence with the EU.

Before examining the adequacy framework, it is important to take a pause and reflect on the

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Anant Mishra is a Marie Skłodowska-Curie Research Fellow and doctoral researcher at the University of South Wales. His research interrogates the legal and institutional disarticulation of EU Justice and Home Affairs frameworks following Brexit, examining UK counterterrorism cooperation with France and Germany. Combining doctrinal legal analysis with strategic studies, he advances differentiated cooperation as a governance model for third-country security cooperation, addressing accountability, data governance, and operational coordination challenges within the post-Brexit European security architecture.

broader landscape of data governance and the contested political stakes around why it matters. Data governance, at its core, refers to the legal and institutional architecture governing how data flows, who owns it, who profits from it, and, more importantly, who is protected in case of misuse. Centered at the digital battlegrounds of twenty-first-century politics, it decides the future of a state's industrial policy, national security, individual sovereignty and economic security. Against this backdrop, the UK-EU adequacy arrangement must be understood, not simply in the context of technical enquiries but in the context of one single broader structural question: who wields power in this digital age?

That said, the EU's adequacy framework is not an instrument of bilateral partnership, but an oversight mechanism. Power to review and monitor adequacy rests exclusively with the Commission, along with the power to impose binding constraints of variable degrees on third countries such as the UK, thereby limiting its ability to achieve independent regulatory divergence. This is a borrowed status, a favour and not a right, primarily dependent on continued compliance and vulnerable to

shifting political conditions. Every adequacy review is an examination of the UK's domestic legal orders' compatibility against EU standards, and the prospect of judicial challenge poses a structural risk, capable of dismantling the data transfer framework in its entirety.

Damage Limitation, Not Strategy

Policymakers in Westminster and in Brussels approach UK-EU data transfer as a risk that requires mitigation, not mutual cooperation. For Westminster, this adequacy anxiety is primarily economic. For the Commission, excessive flexibility for the UK could dilute the GDPR's role in data protection. This is not statecraft: this is firefighting at best, on both sides of the Channel.

As both sides calculate risk, neither is looking at the strategic opportunity that the moment presents. Despite structural vulnerability, the current UK-EU data transfer system is a rare configuration within the fractured digital world of today. Two major economies, sharing rights-compatible regulatory frameworks with functional institutional cooperative mechanisms, underpinned by a shared goal of resisting domination by Silicon Valley or Beijing. The moment either side pursues this alignment with strategic intent rather than defensiveness, it could potentially unlock the internal order they have been searching for: a viable model.

The Binary Trap

Two models currently dominate global data governance, both of which are inadequately serving regulatory interests foremost of the world. Washington's model simply outsources data governance to the private sector, with Big Tech companies setting the rules on how personal data is mined, collected and monetised. Privacy is at best a footnote, secondary to the logic of innovation and commercial growth. For the Global South, this model does not reflect partnership but a pipeline: Silicon Valley harvests the data, and national sovereignty is perpetually lost as member states lose control over digital infrastructure, with terms and conditions replaced by rights of citizens.

Beijing offers a different path, an escape at best. Its model rests on three pillars: explicit state control over digital infrastructure, local data retention, and strategic export of digital influence via the Digital Silk Road. Beijing's platform may offer some respite from Silicon Valley's hegemony, but

replaces one dependency with another, exposing member states of the Global South to heightened surveillance, control and an implicit conditionality to align with Beijing's priorities.

For the Global South, what is needed is a framework that simultaneously pursues economic openness and ensures fundamental rights and sovereign control over digital infrastructure. Washington offers the first and ignores the rest, whereas Beijing offers the third, potentially undermining the two former, neither of which is the answer. The choice between Silicon Valley and Shenzhen appears inevitable for the Global South, but this article argues that a third door exists, far outside their strategic calculus.

A Third Way?

If positioned right and proactively pursued with strategic intent, the UK-EU could fill this gap, with pre-existing institutional infrastructure for such an ambition. The Trade and Cooperation Agreement already contains structured provisions for institutional cooperation and exchange of personal data, even going beyond an adequacy framework. The Council of Europe's Convention 108+ offers what the GDPR doesn't, with existing signatories from states in Africa, Latin America and Asia, offering a path oriented by rights-based governance without seeking full GDPR compliance.

The GDPR's adequacy mechanism is the EU's principal instrument for exporting its data protection regime, but it is simply blunt and binary: seeking total regulatory alignment with EU standards without offering any middle ground. The Convention 108+ offers an alternate pathway, offering step-by-step reform mechanisms, ensuring data protection without imposing operational rigidities, and giving them the opportunity to develop a framework, without borrowing (much less copying) European legal standards.

The argument is not about European colonisation of data governance; it is about developing collaborative data protection standards rooted in local sensitivities, operational realism, capacity constraints, and sovereignty. It's also about giving a chance to countries to safeguard citizen data without pledging allegiance to either Washington or Beijing.

The author's argument for UK-EU cooperation on digital governance is not about simply fixing a bilateral relationship; it is about navigating a world

where the digital global order is shaped by powers that do not share values. Both London and Brussels are witnessing the rules of the digital economy being written in forums they no longer shape. This shared interest has the potency to sow the seeds of a strategic partnership that could go well beyond adequacy reviews or bilateral cooperation. It would lay the foundation for a shared policy that neither side displays the strategic confidence to pursue.

What the Global South Needs

Today, states of the Global South face a dual-structured challenge: inadequate institutional and technical capability to develop robust data protection regimes and perpetual dependency on US tech and Chinese digital infrastructure that constrain regulatory autonomy. To the author, this reflects a classic behaviour of data colonialism, with Big Data companies eroding sovereignty and economic value. And for much of the Global South, data protection laws exist, albeit on paper, considering that regulatory institutions are either underfunded or enforcement mechanisms are perpetually absent or ineffective.

The EU has the legal and regulatory architecture, but it lacks the UK's diplomatic footprint. The UK's Commonwealth connection spans across jurisdictions in Africa, Asia and the Pacific, reaching deep into the Global South and outside the EU's sphere of influence. Furthermore, its technical expertise in cyber security and data infrastructure reinforces the EU's operational depth. To that end, a coordinated UK-EU approach has the potency to offer more than just setting standards: interoperable frameworks reinforced with technical support, regulatory training, and financial assistance for enforcement institutions, turning commitments into legislation. Even the best data protection law is meaningless without the necessary institutions to support it, relevant legislation to enforce it, or the political commitment to operationalise it. A coordinated UK-EU finance strategy could advance three mutually beneficial objectives: support local cloud infrastructure, drive regional legal harmonization initiatives, and reserve a seat for developing economies during negotiations with Silicon Valley platforms and Beijing-driven infrastructure providers.

The Instrument Exists

London and Brussels have all the tools they need. Convention 108+ accession pathways, GDPR adequacy assessments, TCA cooperation mechanisms, and development finance are all readily available and deployable instruments in their toolkit. The gap lies not in the toolkit but in the absence of a strategic vision to use it. But the irony lies in the impasse between the UK and the EU, which share more values than Beijing or Washington. Both are anchored in rights-based frameworks, face pressures from Washington and Beijing-led infrastructure providers, and both tend to lose out from the global digital order they once shaped.

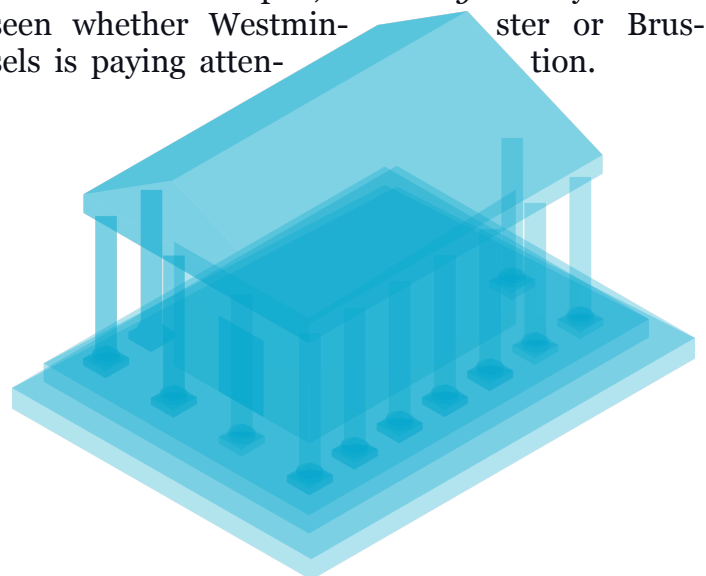
But the Window is Closing

“The instruments are available, but the strategic need is pressing, and the window remains open, narrowly.”

The opportunity is genuine and calls for strategic action *today*. Each year of inaction pushes the Global South one step closer towards signing away their digital futures (one data agreement or digital infrastructure agreement),

which will define the digital future for years to come. A UK-EU cooperation, if done proactively, holds the potency to rewrite the terms of the global digital debate, proving data governance does not necessarily mean making a hard choice between data exploitation and state control, demonstrating that rights, sovereignty and open markets can co-exist.

But this opportunity can only be realised if there is a change in mindset. The instruments are available, but the strategic need is pressing, and the window remains open, *narrowly*. It is yet to be seen whether Westminster or Brussels is paying attention.



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