

# Canada versus Chequers

How the two possible deals compare



**Let the people decide**



## Rules

Mrs May's Chequers plan	Canadian-style deal	Chequers and Canada
<p>The UK would sign up to “a <i>common rulebook</i>” whereby we would follow all the EU’s product rules, regulations and standards – including product safety, health and environmental rules.</p> <p>MPs could decide not to pass new legislation from Brussels, but would have to accept “<i>consequences from breaking the UK’s international obligations</i>”.</p> <p>The UK could not relax rules, regulations and standards – eg. to compete in markets which are not so stringent.</p>	<p>The UK and EU would agree a system of “mutual recognition” whereby we would trust each other to have the same standards and regulations.</p> <p>The UK could change its rules, but there would be an “<i>outcome equivalence</i>” agreement, whereby we would promise that end standards and rules would be the same or equal – even though we might use different ways of getting there.</p> <p>This would permit the UK to change its regulations more significantly.</p>	<p>Services would not be covered by either deal, even though the UK is an 80% service economy.</p>



## New Trade Deals

Mrs May's Chequers plan	Canadian-style deal	Chequers and Canada
<p>The UK would be entitled to strike trade deals with countries outside the EU.</p> <p>But the Government says the UK will follow EU product rules, regulations and standards, so this would limit the goods we could import from countries with lower standards – including food and agricultural products from the US.</p>	<p>There would be no restrictions on the UK negotiating free trade deals with other countries – including large countries such as the US, India, Saudi Arabia, China; and smaller ones such as Indonesia, Korea and smaller African countries.</p>	<p>The UK would operate an “<i>independent trade policy</i>” as part of the World Trade Organisation (WTO).</p>



## Irish border

Mrs May's Chequers plan	Canadian-style deal	Chequers and Canada
<p>The UK would avoid a hard border by following all EU rules <i>"necessary to provide for frictionless trade"</i>, - including measures such as a <i>"facilitated customs arrangement"</i> and a <i>"free trade area for goods"</i>.</p>	<p>The UK would use <i>"creative"</i> solutions to avoid a hard border and keep trade as <i>"frictionless/free flowing as possible"</i>.</p>	<p>The measures and solutions to avoid a hard border could include:</p> <ul style="list-style-type: none"><li>- Trusted trader schemes</li><li>- pre-registration arrangements</li><li>- technological solutions, such as number-plate recognition cameras</li></ul> <p>If talks on this fail between the UK and EU, the UK would be required to adopt the <i>"Irish backstop"</i> – this was agreed by the Government with the EU in December 2017.</p> <p>The Irish backstop means Northern Ireland would remain fully aligned with EU rules. This would prevent a hard border on the land and create a border down the Irish Sea - between the whole of Ireland/ Northern Ireland and Great Britain.</p>



## Immigration

Mrs May's Chequers plan	Canadian-style deal	Chequers and Canada
<p>EU citizens would keep their current rights to move to, live and work in the UK until the end of the transition period – ie. until December 2021.</p>	<p>A Canada style deal would not include freedom of movement, therefore EU citizens would lose the right to move to, live and work freely in the UK, and UK citizens would lose the right to move to, live and work freely in the EU.</p>	<p>The UK and EU would aim to agree after Brexit new movement of people and immigration rules – including in relation to the rights of EU citizens in the UK and UK expats living in the EU.</p>

## Judicial independence

Mrs May's Chequers plan	Canadian-style deal	Chequers and Canada
<p>The “<i>direct jurisdiction</i>” of the European Court of Justice (ECJ) would end - instead, British judges would have to pay “due regard” to the ECJ’s previous rulings on areas covered by the common rulebook.</p> <p>But in a formal dispute between the UK and EU, for example over trade, the matter would be resolved by an arbitration panel. This panel would be required to refer to the ECJ to interpret EU law - and be bound by the ECJ’s decision.</p> <p>The UK and EU could also choose to resolve disputes through the WTO – this is usually a slow process.</p>	<p>The ECJ would not be higher/ superior to UK courts.</p> <p>In a formal dispute between the UK and EU, for example over trade, the matter would be resolved by a Joint Committee.</p> <p>The Joint Committee would also carry out joint monitoring and supervisory functions to identify emerging issues.</p>	