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THE EUROPEAN UNION (WITHDRAWAL) BILL IN THE HOUSE OF LORDS

— THOUGHT LEADERSHIP

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The House of Lords' amendments to the European Union (Withdrawal) Bill can be categorised into five types: political; Parliamentary control over the Brexit process; Parliamentary control over the initial amendments to retained EU law needed to correct deficiencies; Parliamentary control over subsequent amendment to that law; and devolution. Many of the amendments are laudable in their aims, but it is important not to lose sight of the practical necessity of ensuring that UK law works effectively on Brexit and can then be kept up to date.

Key issues

- The House of Lords wants to take back control of Brexit from the Government
- This would challenge the capacity of Parliament to make the changes to UK law necessary for Brexit
- The Government will want to reverse many of the Lords' amendments – if it can

The European Union (Withdrawal) Bill as passed by the House of Commons had its detractors, but at least it was a relatively simple instrument. It repealed the European Communities Act 1972, imported most EU law back into UK law as "retained EU law", and granted the Government wide powers to correct deficiencies in retained EU law caused by the UK's withdrawal from the EU. Job done.

The Bill that will leave the House of Lords to go back to the House of Commons is anything but simple. The House of Lords (an unelected chamber in which the Government has no majority) has added hugely to the Bill, the additions ranging from the politically provocative to the pursuit of Parliamentary purism. These latter amendments seek to impose stringent Parliamentary control on the changes to retained EU law that the Government can make. It is understandable, even proper, that a Parliamentary chamber should wish to take back control of the legislative process, but questionable whether a Bill in the form passed by the House of Lords will in practice enable the Government to make the amendments to retained EU law that are necessary for that law work effectively after Brexit. Principle may have triumphed over practicality in the House of Lords.

In this briefing, we will look at the changes to the Bill made by the House of Lords, but first we discuss Parliamentary procedure.

Parliamentary ping pong

UK primary legislation must generally be passed by both Houses of Parliament in the same terms and must then receive the Royal Assent (no monarch has refused the Royal Assent to a Bill passed by Parliament since 1708). Only if all three stages are passed does legislation reach the UK statute book as an Act of Parliament.

The European Union (Withdrawal) Bill started life in the House of Commons, where the Government's Bill was passed with only a small number of relatively minor amendments. The Bill then went to the House of Lords, which has amended the Bill substantially. Because the Bill has been amended, it must now revert to the House of Commons so that the Commons can decide whether it agrees with each of the Lords' amendments. If the Commons were to do so, the Bill could then be sent for the Royal Assent.

In reality, the Government will press the House of Commons to reverse a large number of the amendments to the Bill made in the House of Lords. The House of Commons may, indeed, seek to add new amendments (an amendment allowing for a second referendum has already been tabled in the Commons). If the Commons changes the Lords' Bill, it will need to go back to the House of Lords, for a second time, so that the House of Lords can decide whether to accept each of the Commons' amendments. If the House of Lords accepts all the Commons' amendments,

the Bill can go for the Royal Assent, but if the House of Lords rejects any of the Commons' amendments, the Bill must go to the House of Commons for a third time. This process can be repeated any number of times until the text of the Bill is finally agreed (assuming that ever happens) - hence the usual description of the process of a Bill passing repeatedly back and forth between the two legislative Houses as "Parliamentary ping pong" (Parliament's website even described the "next event" for the Bill as passed by the Lords as "Ping Pong | Date to be announced").

In normal circumstances, there is a legal constraint on the ability of unelected House of Lords to frustrate the elected House of Commons. If the House of Lords refuses to approve a Bill passed by the House of Commons, the Parliament Acts 1911 and 1949 allow the elected chamber to override the House of Lords (this has only been done seven times in more than a century, and one of those then fell due to the outbreak of the First World War).

Under section 2 of these Acts, legislation will become law even though it has not been passed by the House of Lords provided that: it has been passed by the House of Commons in two successive sessions of Parliament; it has been sent to the House of Lords at least one month before the end of each of those sessions and rejected by the House of Lords; and at least one year has elapsed between the second reading in the House of Commons in the first of those sessions and the date on which the legislation is passed by the House of Commons in the second of those sessions.

The requirement that a Bill be passed in two sessions of Parliament and that there be an interval of 12 months may make it difficult for the Government to use the Parliament Acts in this instance. The current session of Parliament is intended to run for at least another year (though a change of mind is possible). With the added 12 month gap, it may be that the Parliament Acts could not be invoked until well into 2020, which is almost certainly too late as the UK will leave the EU on 29 March 2019.

That leaves politics. The Parliament Acts 1911 and 1949 have been little used because the House of Lords customarily concedes to the elected chamber. The House of Lords often asks the House of Commons to think again about an aspect of legislation but, if the Commons does so and abides by its original view, the House of Lords seldom pushes the point. This is likely to be the case with the European Union (Withdrawal) Bill, but the subject matter, its constitutional significance and the strength of feelings on Brexit may encourage some peers to be more assertive (particularly as the distance in time from the referendum grows).

If the House of Lords does choose to push any of its points, the Government may need to consider what concessions it can offer in order to secure the Lords' swift approval to the Bill give that time is tight. The Government would like to get the Bill on to the statute book in or around June or July so that it can start the formal processes required to put in place the secondary legislation allowed by the Bill (see below) in time for the UK's withdrawal from the EU on 29 March 2019 just in case there is no transitional period. The longer it takes for the Bill to pass through Parliament, the more difficult this will become.

Politically provocative amendments

The single market and the customs union

The Government's Brexit policy is that the UK should leave the EU's single market and its customs union (though the Government is as yet unclear on what, if anything, should replace these in the longer term in order to minimise impediments to trade between the UK and the EU).

Some of the amendments passed by the House of Lords go to the heart of the Government's policy. For example:

- An amendment to clause 1 provides that the European Communities Act 1972 will not be repealed unless the Government has laid before both Houses of Parliament "a statement"

outlining the steps taken to negotiate… an arrangement which enables the United Kingdom to continue participating in a customs union with the European Union". This refers to a customs union, not the customs union, but it is clearly a challenge to Government policy.

- At the other end of the Bill, clause 24(5) provides that some of the main aspects of the Bill (including clause 1) will not come into force "until it is a negotiating objective of the Government to ensure that an international agreement has been made which enables the United Kingdom to continue to participate in the European Economic Area after exit day." Remaining in the EEA means staying in the single market.

Both these amendments are legally obscure (for example, could the Government comply with clause 1 by laying a statement before Parliament saying "none"?) but, since they are an attack on the core of the Government's Brexit policy, the Government will surely seek to reverse them in the House of Commons. Assuming that the Commons does reverse them, it may be unlikely that the House of Lords would insist upon them for a second time.

The Government cannot necessarily take for granted that its wishes will prevail in the House of Commons. If the opposition Labour Party is united and decides to vote against an amendment, whether on principle or for the sheer joy of defeating the Government, it would take only a small number of Conservative backbench MPs to rebel in order to defeat the Government. And certain Conservative backbenchers are very strongly opposed to Brexit and/or to leaving the single market and the customs union. But whether the opposition is sufficiently united to defeat the Government is also unclear. Its official policy is, like the Government's, against remaining in the single market (and therefore joining the EEA), though its position on the customs union is more fuzzy. There are also a significant number of Labour MPs with constituencies that voted heavily for Brexit who might not want to risk being perceived to have defied their constituents' wishes.

Ireland

Another heavily political amendment is the new clause 13. This provides that in exercising its powers provided by the Bill, the Government must not act in a way that is incompatible with the Northern Ireland Act 1998, must have due regard to the joint EU/UK report on the first phase of the Brexit negotiations, and, in particular, must not erect border posts or impose customs checks between Northern Ireland and the Republic of Ireland.

The Northern Ireland Act 1998 implemented the Belfast (or Good Friday) Agreement, under which the Assembly and the power sharing executive in Northern Ireland were established (though they are currently in abeyance as the Unionists and Republicans are unable to agree on, for example, use of the Irish language). The joint UK/EU report on phase 1 of the Brexit negotiations provided that "[i]n the absence of agreed solutions, the United Kingdom will maintain full alignment with those rules of the Internal Market and the Customs Union which, now or in future, support North-South cooperation, the all-island economy and the protection of the 1998 Agreement".

Many are concerned that the imposition of customs and similar checks within the island of Ireland could destabilise the position. But if there is no provision for customs checks of any nature, that would imply that Northern Ireland is part of the EU's customs union, possibly even the single market, which in turn would imply that the current land border between Northern Ireland and the Republic had, for some purposes at least, been replaced by a border in the Irish Sea, thereby dividing Northern Ireland from Great Britain (ie England, Scotland and Wales).

Even putting to one aside the problems that this would cause for the EU, the Government has ruled out this kind of internal division within the UK, doubtless reinforced in this by the stern views of the Democratic Unionist Party on which the Government relies for a majority in the House of Commons. The DUP, as its name suggests, is primarily focused on ensuring the continuation of the union between Great Britain and Northern Ireland, and views with concern anything

that might be perceived to shift Northern Ireland closer to the Republic's orbit.

Clause 13 is itself complex and uncertain. For example, it is not clear how the exercise of the powers under the Act would lead to the erection of border posts or customs checks in Northern Ireland. Customs are to be covered in due course by separate legislation, which will be needed when the UK ceases to be subject to EU trade law. Be that as it may, it seems likely that the Government will want to reverse this amendment, but any issue relating to the future of Northern Ireland raises deep concerns given its history. The Troubles still lie within the experience or recollection of many, and no politician would wish to risk responsibility for their revival. What solution the Government may be able to offer is not yet clear (recent hints are that the UK might seek, as a "temporary backstop" to remain in the EU's customs union for a short time after the end of the currently planned transition period, if only to allow more time to find a solution).

Controlling the Brexit process

Another set of amendments aims to give Parliament greater control over the UK's departure from the EU. These include the following.

- Clause 10(1) provides that the Government may only "conclude" a withdrawal agreement with the EU if a draft is first approved by a resolution in the House of Commons and is subject to consideration of a motion in the House of Lords. The Government has already pledged to give Parliament a "meaningful vote" on the withdrawal agreement; this amendment puts that pledge into statutory form (this is in addition to the Constitutional Reform and Governance Act 2010, which already requires the Government to obtain the House of Commons' approval before it ratifies any treaty, including the withdrawal agreement).
- Clause 10(2) requires the Government to try to ensure that the UK Parliament debates the draft withdrawal agreement before the European Parliament does so. The consent of the European Parliament is required under article 50 of the Treaty on European Union before the EU can conclude the withdrawal agreement. This amendment is aimed at giving the UK Parliament greater scope to reject the withdrawal agreement and send the Government back into negotiations (assuming, of course, that the EU is prepared to talk further). If the European Parliament had already given its consent, there would be a feeling that the UK Parliament's only options would be to take it or to leave it. Clause 10(2) is reinforced by clause 10(5), which requires the Government to follow Parliamentary directions in relation to negotiations with the EU if, amongst other circumstances, the House of Commons has not approved the withdrawal agreement by 30 November 2018.
- Clause 10(3) provides that any withdrawal agreement, including any transitional measures, can only be implemented if the agreement is approved by an Act of Parliament, ie not only must the Government achieve the Parliamentary resolutions required by clause 10(1) but it must then secure the passage through Parliament of primary legislation, which is a more complex process (clause 11(1)(b) covers similar territory).
- Clause 11(1)(a) provides that the Government can only implement the withdrawal agreement if Parliament has approved a mandate for negotiations about the UK's future relationship with the EU. A withdrawal agreement will only cover matters such as citizens' rights and the UK's payments to the EU on withdrawal. The EU insists that serious negotiations on the UK's long-term relationship with the EU will only take place after the UK has left the EU on 29 March 2019. This clause aims to assert a degree of Parliamentary control over these later negotiations.

Since the Government has already committed to giving Parliament a meaningful vote on any withdrawal agreement, it may be that the Government will not fight too hard on the amendments in clause 10(1) if it fears defeat. But the Government is likely to resist strongly any attempt by Parliament to tell it what it can and can't agree with the EU. It has repeatedly argued that this would undermine its negotiating position (though the EU has a published negotiation mandate).

Enemies of the people

The English judiciary was scarred by the *Daily Mail*'s front page of 4 November 2016. This had large pictures of the three judges, dressed in judicial ermine and wigs, who gave the first instance judgment in *R (Miller) v Secretary of State for Exiting the EU*, which decided that primary legislation was required to enable the Government to give notice of the UK's intended withdrawal from the EU under article 50 of the TEU. Immediately under the pictures was the headline *Enemies of the People*. The newspaper accused the judges of being out of touch and having declared war on democracy. (The primary legislation passed quickly and without political incident.)

The newspaper's attack on the judiciary was misguided and inappropriate, but that does not mean that the judiciary wishes to face anything similar again. For that reason, they have expressed concern over clause 7(2) of the Bill. As passed by the House of Commons, this provided that a UK court need not have regard to any decisions of the CJEU given after Brexit, but could do so if the court considered it appropriate to do so. The judicial concern was that if a court were to decide to follow a CJEU decision on a piece of EU law that was the same as retained EU law, judges concerned could face a similar attack.

The House of Lords has reversed the emphasis of this clause, taking it from the negative to the positive. Under the Lords' amendment, a court may have regard to a post-Brexit decision of the CJEU so far as it is relevant to any matter before the court. The clause is therefore expressly permissive, rather than grudgingly tolerant, and might go at least some way to allaying judicial concerns.

In practice, the amendment is cosmetic and will make no difference to the outcome of any case. If the CJEU has given a relevant decision after Brexit, a UK court will be referred to it and will have to decide whether or not to it agrees. But in the light of the "enemies of the people" incident, judgments might be framed to explain why the particular answer has been reached, with a footnote to the effect that, coincidentally, the same result was reached in the CJEU, rather than giving any semblance of following the CJEU's decision. A departure from the CJEU might be trumpeted rather more loudly.

Amending deficiencies in retained EU law

The House of Lords has not changed the Bill's provisions that import EU law into UK domestic law. But the House of Lords has changed the extent to which the Government can fix problems in this retained EU law without needing to revert to Parliament. Whilst it is in principle right that Parliament should be involved in legislative change, the scale of the changes required and the limitations on Parliamentary capacity may make the Government's task unnecessarily difficult if the House of Lords' amendments remain.

Necessary or appropriate?

The basic rule in clause 9 of the Bill is that the Government can amend retained EU law if two main conditions are met: first, there is a deficiency in retained EU law (eg where the Government considers that it contains reciprocal arrangements that no longer exist or are no longer appropriate, or it confers functions on EU entities); and, secondly, that deficiency arises from the UK's withdrawal from the EU (ie the Government can't amend retained EU law just because it doesn't like it). If the Government considers that these two conditions are met, the Bill passed by the House of Commons allowed the Government to make such amendments to the relevant retained EU law that it considered "appropriate" in order to prevent, remedy or mitigate the deficiency.

The House of Lords has changed "appropriate" to "necessary". This amendment is at best ambiguous and at worst could limit significantly the scope for proper amendment. The two main tests for an amendment to retained EU law remain the same, but if they are met, the changes that can be made to remedy that deficiency are only those that are "necessary" for this purpose. If the choice of amendment to retained EU law were between a narrow and a wide amendment, "necessity" would require the narrower. But in many cases it will not be that simple. There may be a range of parallel policy choices available to remedy a particular deficiency, any of which might be appropriate but none or all of which might be necessary.

Whether, for example, reciprocity in particular circumstances should be retained will still depend upon the Government's view of its appropriateness after Brexit, but the remedy for any lack of appropriateness would then turn on what is necessary. What is necessary to remedy a deficiency could turn upon how, for example, the deficiency is characterised, which remains a matter for the Government's consideration. The full implications of a change from appropriateness to necessity are not clear, but it will unquestionably make the task of correcting UK law more complex, especially given the shortage of time, as well as increasing uncertainty and the risk of legal challenge.

Other constraints

The Bill as approved by the House of Commons allowed regulations made to remedy a deficiency in retained EU law to create new public bodies to take on what were previously EU functions. The House of Lords has removed this ability, with the result that new public bodies can only be created by statute.

If Parliament had the time to consider and, where appropriate, to create new public bodies to do things currently done by the EU or its agencies, that would be the best solution. The danger is that Parliament does not have the time to do so before the UK withdraws from the EU. In some cases, this will not matter. EU functions might fall within the powers of current public bodies, or the Government could use clause 9(1) to expand incrementally the functions of a current public body (subject to its being "necessary" to do so to remedy a deficiency in retained EU law). But there is a risk that this would lead to public bodies carrying out a variety of functions that would be best carried out by distinct bodies and, again, to challenges the legality of implementing rules.

The House of Lords has amended the Bill to prevent the Government from imposing any fees in the subordinate legislation correcting deficiencies in retained EU law (new taxes were already banned). It has also removed the clause that allowed the Government to make rules to prevent or remedy any breach, arising from withdrawal from the EU, of any

international obligations. If the Government wants to do either, it must secure the passage of primary legislation.

Subordinate legislation under the Bill will be prepared by the Government, but must still be laid before Parliament and, depending on the procedure required, approved or at least not disapproved by Parliament. The procedures are far less onerous than for primary legislation (eg Parliament cannot amend subordinate legislation). The House of Lords has added a sifting procedure, under which a committee in each House will decide whether it is sufficient for the negative procedure to apply to a particular piece of subordinate legislation (ie it will become law unless Parliament objects) or whether the affirmative procedure is required (ie it will only become law if Parliament votes in favour).

Future control over retained EU law

Clause 9 of the Bill is concerned with amending retained EU law so that it works on exit day. But what happens to retained EU law then? Clause 8 and Schedule 8, as amended by the House of Lords, are confusingly complex, but are aimed at limiting the Government's ability to make any further changes to retained EU law without Parliamentary approval through the use of pre-Brexit powers.

Existing primary legislation already contains a wide variety of delegated rule-making powers, though those powers are necessarily constrained by the UK's membership of the EU. So far as, for example, the EU has legislated in a particular area, the domestic rule-making are in abeyance. The removal of that EU fetter will potentially reopen these rule-making powers, including (under the Bill as passed by the House of Commons) the ability to amend retained EU law so far as that retained EU law falls within an existing rule-making power.

The Bill as passed by the House of Lords is highly restrictive so far as the use of prior powers is concerned. It allows prior powers to be used to amend "retained direct minor EU legislation" (ie directly applicable EU law ranking below EU Regulations), provided that this is consistent with "retained direct principal EU legislation" (ie Regulations). But prior powers cannot be used to modify retained direct principal EU legislation unless the power is a Henry VIII power (ie the power can already be used to amend primary legislation) or the "modification is supplementary, incidental or consequential in connection with any modification of any retained direct minor EU legislation" (Schedule 8, paragraph 5(3)).

The meaning of this is not clear, but it appears to be that the EU equivalent of secondary legislation can in general be amended by UK secondary legislation made under powers in pre-Brexit legislation covering the same territory, but the EU equivalent of primary legislation can in general only be amended by UK secondary legislation to the extent that the amendment is consequential upon an amendment to EU secondary legislation.

A key problem with this approach is that EU legislative practices do not match UK legislative practices. The sort of detail that would be included in secondary legislation in the UK is frequently found in primary legislation in the EU. An example is Regulation (EU) No 575/2013 on prudential requirements for credit institutions and investment firms (commonly called the CRR). It contains 337 pages of complex technical details on the capital requirements for banks. The sort of detail found in this Regulation would, in a UK context, be found in rules made by the PRA or FCA under, for example, section 64A of the Financial Services and Markets Act 2000, not in the Act itself.

Restricting the ability of secondary legislation to keep this kind of retained EU law up to date risks putting some aspects of UK law into a form of sclerosis because Parliament lacks the capacity to address the quantity of primary legislation that could be required. Over the last decade, Parliament has passed an average of about 31 Acts per year, but, according to the House of Commons Library, there are over 5000 EU Commission, EU Council or EU Council/ Parliament Regulations in force in force in the UK (leaving aside over 2000 delegated or implementing regulations). Is it realistic to require primary legislation to amend all these laws?

Enhanced protection

Clause 4 of the House of Lords' Bill provides enhanced protection for five specific areas of retained EU law: employment rights, equality rights, health and safety, consumer standards, and environmental protection. None of these areas is defined, which could cause problems.

Retained EU law that covers any of these areas can only be amended by primary legislation or by secondary legislation provided that, amongst other conditions, there has been a period of consultation with relevant stakeholders and the Government certifies that the secondary legislation only makes technical changes to retained EU law in order for it to work following exit.

The House of Lords also added a clause to the Bill providing that the Government must take steps to ensure that the UK's withdrawal from the EU does not result in the removal or diminution of anything that contributes to the protection and improvement of the environment, including a requirement to publish proposals for primary legislation to impose environmental obligations on public authorities.

The sclerosis might not end with EU Regulations that are imported into UK law on exit day. Retained EU law that will continue to apply after exit day also includes the numerous statutory instruments made under section 2(2) of the European Communities Act 1972 in order to implement EU directives. There is no provision allowing for these to be amended (unless, again, they fall within existing powers). Amendment will, again, require primary legislation, challenging the capacity of Parliament to keep UK law up to date.

Devolution

The Bill that left the House of Commons contained a lot about devolution. The Bill passed by the House of Lords contains even more.

The core battle between the UK and the Scottish Governments is about who gets the powers that are repatriated from the EU on Brexit. For example, agriculture in general falls within the Scottish Government's devolved powers. As part of the UK, Scotland's ability to exercise of those powers is subject to overriding EU rules, which limit significantly what Scotland can do. The UK Government wants, initially at least, the bulk of repatriated EU powers to come to it in order to maintain the UK's single market. The Scottish Government sees this as a power grab by Whitehall, depriving it of existing devolved powers. The UK Government's response is that Scotland has never had power over the relevant areas because they fall within the EU's jurisdiction. (Wales originally sided with Scotland, but its administration has now reached a settlement with the UK Government.)

The solution to this spat is largely political. The Scottish Parliament and Government were established by UK legislation (the Scotland Act 1998), and the terms of devolution can similarly be amended by further UK legislation. However, the Sewel Convention, now embodied in section 28(8) of the Scotland Act 1998, provides that the Westminster Parliament will not "normally" legislate on devolved matters without the Scottish Parliament's consent. The European Union (Withdrawal) Bill does affect devolved matters, and the Scottish Parliament has refused its consent to the Bill.

In *R (Miller) v Secretary of State for Exiting the European Union* [2017] UKSC 5, the Supreme Court decided that the Sewel Convention is a political declaration that does not place any legal fetter on the Westminster Parliament's ability to legislate for Scotland. The Government can therefore press on with the Bill through the Westminster Parliament notwithstanding the Scottish Parliament's refusal of consent.

The Government will, however, have to weigh the political cost of doing so, both in Scotland and the UK more generally. There are 35 Scottish National Party MPs in the Westminster Parliament. Their support could be valuable to the Government in order to get its business through Parliament, and their continued opposition will make the Government's life more difficult. The Conservative Party more than doubled its share of the vote in Scotland at the last general election (going from one MP to thirteen), and it may not want to put that gain at risk, but whether a deal is really possible with an SNP-led Scottish Government is questionable.

Conclusion

The European Union (Withdrawal) Bill – indeed, Brexit as a whole – continues to stir passion, at least amongst the politically-interested classes (there may be growing ennui amongst others). It is these passions that have led the House of Lords to make numerous amendments to the Bill as passed by the House of Commons. Many of these are laudably democratic in their aims, but those aims must be tempered by practicality. The 7000 or so pieces of substantive EU law in force in the UK must each be considered, and amendments made to ensure that they work effectively for a post-Brexit UK. The danger of at least some of the Lords' amendments is that they will make that process very difficult.

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