

PEM Call for Evidence: Survey Questions

Harmonisation of Rules of Origin

Currently, the UK has different rules of origin for trade with the EU and non-EU PEM members. If the UK were to join PEM, it would replace the rules of origin in all those agreements with a single set of rules of origin, effectively harmonising rules with our near neighbours.*

**The harmonised common ruleset would only apply between the UK and PEM members with which the UK has an existing FTA.*

Q8 To what extent would the harmonisation of rules of origin in UK agreements with near neighbours be important to you, your members, or those you advise in practice?

- Very important
- Somewhat important
- Not important
- Don't know

Q9 Please expand on your response to Q8 if you would like.

Rules of Origin in UK Agreements – EU and non-EU Rules of Origin

The PEM Convention ruleset updated with 'revised' rules due to be fully implemented between PEM members by 1 January 2026. The UK's agreements with most non-EU PEM members currently align with original PEM rules, not the 'revised' rules.

If the UK were to join PEM, rules in all the UK's agreements with PEM members (including the EU) would update to 'revised' rules.

Updating the UK-EU TCA and non-EU PEM FTAs to align with 'revised' rules would mean the rules of origin to export from the UK to the EU and other PEM members (and vice versa) will change for some goods. They might become easier or more difficult to meet depending on the product. The majority of rules are already similar to revised PEM rules so would not change.

Q10 If the UK were to join PEM, the rules of origin in all UK agreements with PEM members (including the EU) would be replaced with the 'revised' PEM rules.

To what extent would this change make it easier or more challenging for your good(s) to meet the rules of origin and benefit from preferential tariffs, compared to now?

Please answer for you, your members, or those you advise in practice.

- It would be much easier.
- It would be somewhat easier.
- It would be neither easier nor more challenging.
- It would be somewhat more challenging.
- It would be a lot more challenging.
- There would be no difference as the rules that I, my organisation or members use will not change.
- There are differences across members or organisations I advise
- Don't know

Q11 Please expand on your response to Q10 if you would like.

Cumulation

A key benefit of the PEM Convention is diagonal cumulation between the parties. Diagonal cumulation arrangements in the PEM zone mean materials from a PEM member can be incorporated in products manufactured by another member and used to meet the rules of origin when exporting to another PEM signatory (so long as they all have FTAs with each other).

At the moment, the UK is not a member of PEM and does not have diagonal cumulation arrangements with FTA partners in the PEM zone.

Example

A Swiss widget maker exports their widgets to the EU. The wheels from the widget come from Morocco. As Switzerland, Morocco and the EU all have FTAs with each other and are all members of PEM, the Swiss exporter can count the Moroccan widget wheels as 'originating content' in order to meet the rules of origin that determine whether the widget can enter the EU under a preferential tariff rate.

Non-EU PEM member inputs in UK exports

If the UK joined PEM, UK exporters could count materials or inputs from EU and non-EU PEM members as 'originating' to assist them in meeting the rules of origin when exporting to other PEM members (including the EU).

Q12 Considering potential and future supply chains, how helpful or unhelpful would diagonal cumulation of inputs from non-EU PEM members in UK exports be to you, your members or those you advise?

- Very helpful
- Moderately helpful
- Neither helpful nor unhelpful
- Moderately unhelpful
- Very unhelpful

- Don't know
- Not applicable

Q13 If diagonal cumulation of non-EU PEM inputs in UK exports would be helpful or unhelpful to you, your members or those you advise, what would be the impact on potential and future trade?

Tick all that apply.

13a to the EU:

- Increased ability to claim preference
- Greater supply chain flexibility
- Increased demand for my businesses' intermediate products
- No change
- Increased competition for my product
- Don't know
- Not applicable

13b to Non-EU PEM members:

- Increased ability to claim preference
- Greater supply chain flexibility
- Increased demand for my businesses' intermediate products
- No change
- Increased competition for my product
- Don't know
- Not applicable

UK inputs in PEM member exports

If the UK joined PEM, exporters in PEM countries could count materials or inputs from the UK as 'originating' to assist them in meeting the rules of origin when exporting to other PEM countries.

Q14 Considering potential and future supply chains, how helpful or unhelpful would diagonal cumulation of UK inputs in exports within the PEM zone be to you, your members or those you advise?

- Very helpful
- Moderately helpful
- Neither helpful nor unhelpful
- Moderately unhelpful
- Very unhelpful
- Don't know
- Not applicable

Q15 If diagonal cumulation of UK inputs in exports within the PEM zone would be helpful or unhelpful to you, your members or those you advise, what would be the impact on potential and future trade?

Tick all that apply.

- Increased ability to claim preference
- Greater supply chain flexibility

- Increased demand for my businesses' intermediate products
- No change
- Increased competition for my product
- Don't know
- Not applicable

Non-EU inputs in PEM member exports to the UK

If the UK joined PEM, exporters in EU and non-EU PEM countries could count materials or inputs from the other PEM countries as 'originating' to assist them in meeting the rules of origin when exporting to the UK.

Q16 Considering potential and future supply chains, how helpful or unhelpful would diagonal cumulation of non-EU PEM inputs in PEM member exports to the UK be to you, your members or those you advise?

- Very helpful
- Moderately helpful
- Neither helpful nor unhelpful
- Moderately unhelpful
- Very unhelpful
- Don't know
- Not applicable

Q17 If diagonal cumulation of non-EU PEM inputs in PEM member exports to the UK would be helpful or unhelpful to you, your members or those you advise, what would be the impact on potential and future trade?

Tick all that apply.

- Increased ability to claim preference
- Greater supply chain flexibility
- Increased demand for my businesses' intermediate products
- No change
- Increased competition for my product
- Don't know
- Not applicable

Q18 Is there anything else you would like to tell us about the impact on supply chains if the UK joined PEM?

Please include within this anything you wish to expand on for Q12 to Q17.

Q19 Since the UK's exit from the EU, how have your (or that of your members or those you advise) use of inputs or intermediate products changed?

Tick all that apply.

- Increase in UK inputs
- Decrease in UK inputs
- Increase in EU inputs
- Decrease in EU inputs

- Increase in inputs from the PEM region (not including EU)
- Decrease in inputs from the PEM region (not including EU)
- Increase in inputs from outside the PEM region
- Decrease in inputs from outside the PEM region
- No change
- Don't know

Q20 Please expand on your response to Q19 if you would like.

Transshipment

The PEM Convention allows goods originating in one PEM country to clear customs in an intermediate PEM country before being re-exported without further working or processing to a final PEM country where those goods will retain their originating status and receive preferential access.

This facilitation is not in place currently for UK exports since the UK is not a member of the PEM Convention.

Q21 In your assessment, how useful would this facilitation be in trade between the UK and PEM members (including the EU)?

- Very helpful
- Moderately helpful
- Somewhat helpful
- Not helpful at all
- Don't know
- Not applicable

Q22 Please expand on your response to Q21 if you would like.

Origin Procedures

PEM is not a customs union and therefore UK membership would not remove the need for paperwork to prove origin.

Currently, the UK has different origin procedures for trade with the EU and non-EU PEM members. If the UK joined PEM, there would be a single set of administrative arrangements across all the UK's agreements with PEM members. This could simplify the paperwork required to claim preference for UK exporters.

However, the UK-EU Trade and Cooperation Agreement is more facilitative on origin procedures - allowing any trader to submit a Statement on Origin or use importer's knowledge to prove origin rather than a certificate of origin. Under 'revised' PEM rules, there are more criteria for traders to meet in order to use a Statement on Origin. Harmonising rulesets could therefore increase the administrative burden for some traders who currently only trade with the EU.

Example

Currently a UK trader would fill out a Movement Certificate (EUR-MED) for an export to a non-EU PEM member (for example, Egypt) and a Statement on Origin or Importer's Knowledge for an export to the EU (for example, Germany).

If the UK were a member of PEM, the same Movement Certificate (EUR.1) would be required for Germany as for Egypt.

Q23 Which of these do you, your members or those you advise use if trading under preferential tariffs when using the UK-EU TCA?

Tick all that apply

- Statement on Origin
- Importer's Knowledge
- Neither
- Don't Know
- Not Applicable

Q24 If a movement certificate (for example an EUR.1) was required to prove origin to claim preference under the UK-EU TCA instead of a Statement on Origin, what would the impact be for you, your members or those you advise?

Please choose one option.

- Positive impact - harmonisation of origin documents across the region would be helpful overall, despite any increased administrative costs.
- No impact on administrative costs and would still claim or not claim preference as before.
- Increase administrative cost but would still claim preference.
- Increase administrative cost and reduce the likelihood of claiming preference as a result.
- Don't Know
- Not Applicable

Q25 Please expand on your response to Q24 if you would like.

General Sentiments

Q26 If the UK were to join PEM, what overall impact do you think this would have on you, your members or those you advise?

- Very positive impact
- Positive impact
- Neither positive nor negative impact
- Negative impact
- Very negative impact
- No impact
- Don't know

Q27 Optional - Please outline what you see as the main advantages and/or disadvantages of UK PEM membership. These can be, but are not limited to - more or less favourable Product Specific Rules (PSRs), the introduction of diagonal cumulation, changes to administrative arrangements etc.

Q28 What are the most important factors for you, your members, or those you advise?

Rank the following from 1 to 4, with 1 being the most important factor, and 4 the least.

- *Harmonised rules across FTAs with PEM members*
- *Impact of different rulesets (TCA vs 'revised' PEM vs original PEM) on your ability to access preferential tariffs*
- *Expanded and stable cumulation opportunities*
- *Value of other facilitations- such as those related to origin procedures and transshipment*

Q29 How supportive would you, your members or those you advise be towards UK accession to PEM?

- Very Supportive
- Supportive
- Neither Supportive nor Unsupportive
- Unsupportive
- Very Unsupportive
- Don't know
- Prefer not to say

Q30 Please use this space to add anything else on the potential impacts of UK accession to PEM that you have not had the opportunity to express so far

Stakeholder Information

When answering this section, please choose the option that best describes you or your organisation.

Type of Respondent

Q31 Who are you responding on behalf of?

Please tick one answer choice.

- An Individual – you are responding with your personal views, not as an official representative of any organisation.
- Business – You are responding in an official capacity with the views of an individual business, including if you are a sole trader.
- Business association – You are responding in an official capacity representing the views of a business organisation.
- Other – Please specify

Questions for Businesses

(Questions 32 to 35 will only be visible to those who answered b) to Q31)

Q32 What is the name of your business?

Q33 If registered in the UK, do you have a Companies House number?

- Yes
- No
- Don't Know
- Prefer not to say
- I am not registered in the UK

Q34 If yes, and you are willing to share your Companies House number, please do so. If you are content to enter this number, the government will be able to link your information to our records and ensure the relevant government officials will be made aware of your concerns and priorities.

Q.35 Approximately how many employees, excluding yourself are currently on your business' payroll across all sites?

Please include both part-time and full-time staff. Please do not include any unpaid workers or freelancers.

- Just yourself (no employees)
- 2 to 9
- 10 to 49
- 50 to 99
- 100 to 249
- 250 to 999
- 1,000 to 4,999
- 5,000 to 9,999
- More than 10,000
- Don't know
- Prefer not to say

Business Association

(Questions 36 to 39 will only be visible to those who answered c) to Q31.)

Q.36 What is the name of the trade association or business representative organisation you are responding on behalf of?

Q37 If registered in the UK, do you have a Companies House number?

- Yes
- No
- Don't Know
- Prefer not to say
- I am not registered in the UK

Q38 If yes, and you are willing to share your Companies House number, please do so. If you are content to enter this number, the government will be able to link your information to our records and ensure the relevant government officials will be made aware of your concerns and priorities.

Q.39 Please specify the number of organisations represented

- 0 to 9
- 10 to 100
- 101 to 250
- 251 to 1,000
- 1,001 to 5,000
- 5,001 to 10,000
- More than 10,000
- Don't know
- Prefer not to say

Geographical Presence

Q40 Which markets in the Pan-Euro Mediterranean region are you, your members or those you advise registered in?

Tick all that apply

- Albania
- Algeria
- Austria
- Belgium
- Bosnia and Herzegovina
- Bulgaria
- Croatia
- Cyprus
- Czechia
- Denmark
- Egypt
- Estonia
- The Faroe Islands
- Finland
- France
- Georgia
- Germany
- Greece
- Hungary
- Iceland
- Ireland
- Israel
- Italy
- Jordan
- Kosovo
- Latvia
- Lebanon
- Liechtenstein

- Lithuania
- Luxembourg
- Malta
- Moldova
- Montenegro
- Morocco
- Netherlands
- North Macedonia
- Norway
- Palestine
- Poland
- Portugal
- Romania
- Serbia
- Slovakia
- Slovenia
- Spain
- Sweden
- Switzerland
- Syria
- Tunisia
- Turkey
- Ukraine
- United Kingdom
- Turkey
- Ukraine
- All of the above
- None of the above
- Prefer not to say

Q41 If response to Q40 included UK: Which UK region are you, your members or those you advise registered in?

Tick all that apply

- East Midlands
- East of England
- Greater London
- North East England
- Northern Ireland
- North West England
- Scotland
- South East England

- South West England
- Wales
- West Midlands
- Yorkshire and the Humber
- All of the above
- Prefer not to say

Q42 Where are you based or where are you, your members or those you advise predominantly headquartered?

Please tick one answer choice.

- Albania
- Algeria
- Austria
- Belgium
- Bosnia and Herzegovina
- Bulgaria
- Croatia
- Cyprus
- Czechia
- Denmark
- Egypt
- Estonia
- The Faroe Islands
- Finland
- France
- Georgia
- Germany
- Greece
- Hungary
- Iceland
- Ireland
- Israel
- Italy
- Jordan
- Kosovo
- Latvia
- Lebanon
- Liechtenstein
- Lithuania
- Luxembourg
- Malta

- Moldova
- Montenegro
- Morocco
- Netherlands
- North Macedonia
- Norway
- Palestine
- Poland
- Portugal
- Romania
- Serbia
- Slovakia
- Slovenia
- Spain
- Sweden
- Switzerland
- Syria
- Tunisia
- Turkey
- Ukraine
- United Kingdom
- Turkey
- Ukraine
- All of the above
- None of the above
- Prefer not to say

Q43 If response to Q42 was UK: Which UK region are you, your members or those you advise predominantly headquartered in?

Please tick one answer choice.

- East Midlands
- East of England
- Greater London
- North East England
- Northern Ireland
- North West England
- Scotland
- South East England
- South West England
- Wales
- West Midlands

- Yorkshire and the Humber
- All of the above
- Prefer not to say

Sectoral Representation

Q44 Which sector(s) best represents your operations or the operations of members or those you advise?

Please tick all that apply.

- Meat & Meat Preparations
- Fish & Shellfish
- Dairy Products & Eggs
- Fruit and Vegetables (Including Prepared/Preserved/Juices)
- Sugar and Confectionary
- Coffee, Tea, Spices
- Cocoa, Chocolate and Confectionary
- Cereals, Grains, Flours
- Animal orVegetable Fats and Oils
- Prepared Foods
- Beverages
- Waste from the Food Industries (Including Animal Feed)
- Other Agriculture
- Mineral Fuels
- Chemicals
- Pharmaceuticals
- Plastics
- Rubber
- Hides, Fur, Leather and Articles
- Wood, Paper, Cork, Straw and Articles
- Textiles
- Clothing
- Footwear, Headwear and Clothing Accessories
- Ceramics
- Glass and Glassware
- Precious Metals, Stones and Jewellery
- Metals and Articles
- Electrical Equipment Manufacturing
- Clean Energy
- Other Manufacturing
- Automotive
- Aerospace
- Other Transport Equipment

- Medical Equipment
- Optical, Photographic, Measuring Apparatus
- Architecture
- Audit or Accountancy
- Broadcasting
- Construction Services
- Consulting and Advisory Services
- Creative Industry
- Customs Advisory or Brokerage
- Digital and Information Technology
- Distribution Services
- Education
- Financial Services and Insurance
- Health and Social Care
- Hotels and Restaurants
- Legal Services
- Logistics
- Real Estate
- Retail
- Storage and Warehousing
- Transportation (Land, Air, Sea)
- Other Services
- Don't Know
- Prefer not to say
- None of the above – please specify

Trading Experience

Q45 Do you trade internationally?

Please choose the answer that best describes your trading experience.

- I or my business trades internationally directly.
- I or my business trades internationally via the use of trade intermediaries such as fast parcel operators.
- I or my organisation represents member businesses who trade internationally
- I or my organisation advises businesses on importing and exporting, for example fast parcel operator, customs advisor or broker, tax advisor, consultant.
- I am not associated with a business that trades internationally.
- Don't know
- Prefer not to say

Q46 Do you, your members or those you advise use the UK-EU TCA to export or import between the UK and EU? If yes, please specify the value of the average annual UK-EU trade.

- Yes - over £50 million
- Yes - £10 million to £50 million
- Yes - £1 million to £10 million
- Yes - £50,000 to £1 million
- Yes - under £50,000
- No
- Don't know
- Prefer not to say

Q47 Which of the following best describe the international trade activities of you, your members or those you advise?

Tick all that apply.

- Export of goods to the EU
- Import of goods from the EU
- Export of goods to the UK
- Import of goods from the UK
- Export of goods to non-EU PEM members
- Import of goods from non-EU PEM members
- None of the above
- Don't know
- Prefer not to say

Rules of Origin Self Assessment

Q48 Do you, any of your members or any businesses you advise have experience using preferential tariffs under Trade Agreements?

- Yes
- No
- Don't know
- Prefer not to say

Q.49 How would you assess your understanding of preferential rules of origin?

1)= No to Minimal understanding, 5)= Excellent understanding or experience of rules of origin

If part of a business or organisation, please consider the understanding of the business or organisation as a whole.

1) 2) 3) 4) 5)

Feedback

Q50 How did you find out about this Call for Evidence?

Please tick one answer choice.

- GOV.UK
- Social Media
- Business Association
- Trade Union
- Word of Mouth
- Other (please specify)

Close

Thank you for taking the time to complete this call for evidence.