

6 May 2025

The Rt Hon Douglas Alexander MP
Minister of State (Minister for Trade Policy and Economic Security)
Department for Business and Trade

Sent by email to alexander.correspondence@businessandtrade.gov.uk

Dear Minister,

Safeguarding UK's leisure marine export industry

Further to my letter dated 12th April where I reiterated our request to safeguard UK's leisure marine industry as far as possible from the tariff wars and, in advance of the EU UK summit on 19th May, I am writing to update you on views recently expressed by British Marine member businesses who have significant trading interests in both the United States and in Europe.

Overall our members remain resolute in their view that the UK should avoid, as far as possible, imposing any retaliatory tariffs on US products in spite of the unwelcome US tariffs that have recently come into force. I would be grateful if you could take this viewpoint into consideration whilst assessing other comments following the recent 'request for input'. In regard to the indicative long list of US products published by DBT, British Marine was concerned to note it included a wide range of recreational craft, including inflatables, sailboats and motorboats, as well as other marine equipment. Whilst US marine products account for just around 7% of marine industry imports to the UK, which is of course considerably less than from European markets, such as France and Germany that together account for around 30% of marine imports to the UK, we would still want to see US marine products removed from any future US product list the UK might be compelled to use in the future. This is because we believe it would trigger higher tariffs on marine exports to the US which makes up around 20% of our industry's export market and is hugely important to UK's leading luxury boat manufacturers, such as Princess Yachts, as well as many other leading marine suppliers such as William Jet Tenders, Barton Marine, and Rooster.

British Marine recently hosted an online event for members to discuss their export strategies in the wake of the new additional US tariffs. We were pleased to be joined by officials from DBT as well as experts from the Chartered Institute of Export and International Trade. In addition to repeating opposition to any potential retaliatory tariffs and the challenges of making decisions during this uncertain period with insufficient clarity from the US on rules of origin etc, our discussion moved to assessing alternative priority markets, including Europe, Asia, the Far East and Canada. With so much uncertainty around trading with the US, our members need the UK Government to redouble its efforts to ease trade between the UK and the European Union as this remains our industry's most important export market - accounting for 44% share of all UK marine exports.

We are mindful that the EU UK Summit on 19th May provides an important opportunity for the UK and EU to lay foundations for a more collaborative future, not only in terms of defence and security but also in regard to reducing post-Brexit trade frictions which could enhance the competitiveness of British export companies. This includes UK marine companies, many of whom are SMEs whose export growth is currently being held back by complex bureaucracy caused by divergent standards and regulations, which impact the cost and speed at which goods can flow through customs to EU customers. In particular, we urge the UK Government to pursue the following matters:

Customs complexities - SMEs face disproportionate administrative burdens in terms of customs declarations and compliance. The commercial invoicing process requires extensive details, as well as the use of correct commodity codes. Even when all the paperwork has been completed correctly, UK exporters can still face delays due to failures with the border system and / or custom officers wanting to inspect

shipments. We believe there is an urgent need to expand simplified customs procedures across the UK EU trading area and, in order to help UK SME businesses, there should be more subsidies for trusted trader schemes such as the Authorised Economic Operator (AEO) scheme, as well as enhanced digitalization to reduce delays and administrative burdens

VAT processes - complex VAT rules across different EU jurisdictions have created challenges for many of our members with their EU customers left frustrated by surprise import VAT and charges on low-value B2C orders. As was recently noted by Parliament's EU Goods Sub-Committee, there is a pressing need to simplify the VAT procedures, provide clearer guidance, and ideally negotiate mutual recognition agreements to alleviate the current administrative burdens. It would also help our members if there was easier UK access to the EU's Import One Stop Shop (IOSS) scheme.

Cross border returns - these are complex, expensive and often not viable for small UK companies seeking to sell products to customers in Europe and can undermine brand reputation. It would be helpful if the UK Government could simplify and promote awareness of Returned Goods Relief (RGR) and mutual recognition of return policies.

Regulatory Divergence - diverging regulations on standards between the UK and EU have complicated compliance for UK marine manufactures exporters. British Marine members advocate mutual recognition of standards and certifications to minimize duplication and facilitate market access.

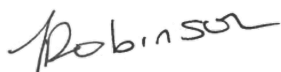
Carbon Border Adjustment Mechanism - with the EU's Carbon Border Adjustment Mechanism (CBAM) set to come into full operation with financial obligations applied from January 2026 and UK's own Carbon Border Adjustment Mechanism still under development but due to come into force from January 2027, the UK marine industry would welcome alignment of these mechanisms to harmonise carbon pricing and prevent additional costs on UK exporters.

Rules of Origin - many SMEs struggle with how to prove origin under the Trade and Cooperation Agreement which runs the risk of them incurring higher tariffs. We have members who would value clearer automated tools to help them determine and certify rules of origin compliance.

Digital integration with EU markets – it has been drawn to our attention that SMEs struggle to maintain parity with EU-based competitors on platforms such as Amazon and Shopify due to regulatory and fiscal constraints. We would like to see the Government offer digital export acceleration schemes that focus on compliance and integration with EU platforms.

Whilst I look forward to receiving your reply to my letter dated 12th April, I would also be grateful if you could ensure these additional points are considered by the Department, with our suggestions put into the mix to help inform trade discussions at, and following, the EU UK summit later this month.

Yours sincerely,



Lesley Robinson OBE
Chief Executive Officer

cc: Mike Kane MP, Minister for Maritime

About British Marine

British Marine (the trading name of British Marine Federation Limited) is the trade association for the UK leisure, superyacht and small commercial marine industry. It has some 1,300 members drawn from both seagoing and inland sectors and represents an industry which employs more than 38,000 people in the UK.

British Marine also owns and operates the Southampton International Boat Show (19th – 28th September 2025) For more information about the work of British Marine, please visit the website: www.britishmarine.co.uk, or follow British Marine on [Twitter](#), [LinkedIn](#) and [Facebook](#)