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SPICe Briefing

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Intergovernmental activity update Q2 2025

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This update gives an overview of intergovernmental activity of relevance to the Scottish Parliament between the Scottish Government and the UK Government, the Welsh Government, and the Northern Ireland Executive during quarter two (April to June) of 2025.

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SB 25-27

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Introduction

SPICe publishes quarterly updates to give an overview of intergovernmental activity.

'Intergovernmental activity' refers to work between governments – in a Scottish context between the Scottish Government and the UK Government or other devolved Governments. It can include discussions on areas of mutual interest, policy development, and policy implementation.

Read more about what intergovernmental activity is and why awareness of it is an essential element of parliamentary scrutiny [on our SPICe blog](#). SPICe has also launched an [intergovernmental activity hub](#) that collates information on intergovernmental activity of relevance to the Scottish Parliament.

Updates are published on the last Thursday of the month following the end of the reporting period. This update reflects [information available at the time of publication](#).

Highlights

Interministerial meetings

Prime Minister and Heads of Devolved Government Council



Finance Interministerial Standing Committee meetings



Interministerial Group meetings

IMG Business and Industry



IMG Housing, Communities and Local Government



IMG Net Zero, Energy and Climate Change



Common frameworks

Finalised

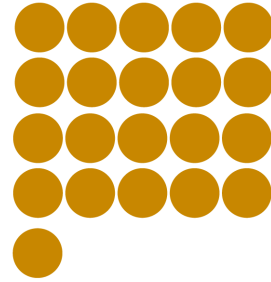
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Published provisionally

22

Scrutiny completed



Not yet published

3



Legislative consent

Legislative Consent granted



Partial Legislative Consent granted



Legislative consent memorandums lodged



UK Internal Market Act 2020 exclusions

Exclusions operating



Single use plastics



Heat networks

Exclusions under discussion



Glue traps

Intergovernmental activity

Formal intergovernmental interactions take place under the following structure, which was established in January 2022.

Intergovernmental relations structure

Top tier:

The Council

This is made up of the Prime Minister and heads of devolved governments.

Middle tier:

Standing committees

The Interministerial Standing Committee (IMSC)

Ministers responsible for intergovernmental relations consider issues that cut across different policy areas, and facilitate collaborative working between groups in the lowest tier.

The Finance Interministerial Standing Committee (F:ISC)

Finance Ministers consider finance and funding matters.

Additional interministerial committees

Portfolio Ministers discuss specific policy areas, such as net zero or education, in Interministerial Groups (IMGs)

Lowest tier:

Portfolio Ministers discuss specific policy areas, such as net zero or education, in Interministerial Groups (IMGs)

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See a [SPICe blog for more information](#) on how the new structure operates.

Interministerial meetings

Interministerial meetings

Prime Minister and Heads of Devolved Government Council



Finance Interministerial Standing Committee



Interministerial Group meetings

IMG Business and Industry



IMG Housing, Communities and Local Government



IMG Net Zero, Energy and Climate Change



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Prime Minister and Heads of Devolved Governments Council

The Prime Minister and Heads of Devolved Governments Council [met on 23 May 2025](#) in London. The meeting was chaired by the Prime Minister and was attended by the First Minister of Scotland, Rt Hon John Swinney MSP. It was also attended by the Chancellor of the Duchy of Lancaster and UK Government Minister for Intergovernmental Relations, Rt Hon Pat McFadden MP; the First Minister of Wales (Prif Weinidog Cymru), Rt Hon Eluned Morgan MS; and the First Minister and Deputy First Minister of Northern Ireland, Michelle O'Neill MLA and Emma Little-Pengelly MLA.

The [communiqué from the meeting](#) published on the UK Government website records that the attendees discussed "the current global context and its impact on domestic policy", "recent trade agreements with the European Union, the United States of America, and India", and "working together to grow the economy, including the importance of the upcoming UK Government Spending Review to support and drive economic growth". The communiqué also records that the "heads of devolved Governments raised a number of priority issues relevant to their own administrations".

Also on 23 May, there was the second meeting of the Council of the Nations and Regions, a body established by the UK Government in October 2024. The Council is attended by the mayors of England's combined authorities in addition to the Prime Minister and Heads of the devolved Governments. The [terms of reference](#) for the Council of the Nations and Regions were published in October 2024.

A communiqué from this second meeting is yet to be published. Speaking in the [House of Lords in July 2025](#), UK Government Minister Baroness Anderson of Stoke-on-Trent said in relation to the May 2025 meeting of the Council that "although a communiqué was not published on this occasion, Ministers will continue to update both Houses through the regular scrutiny mechanisms".

In addition, the Prime Minister and Scottish Government First Minister held a bilateral meeting on the same day (23 May 2025).

In a [letter](#) to the Convenors of the Constitution, Europe, External Affairs and Culture Committee and of the Economy and Fair Work Committee ahead of these meetings, the First Minister indicated that he intended to use the day's meetings to:

- "press for a more detailed account of the impact which the UK Government anticipates for key industries for Scotland" from the trade deal with the United States
- "welcome the steps to rebuild the UK's relationship with the EU", but also to express "disappointment at the lack of devolved Government involvement in the negotiations", and call on the UK Government to "involve devolved Governments properly in the next stages of negotiations"
- "set out the huge opportunities for innovation in Scotland" from artificial intelligence (AI) and "emphasise that we hope to engage closely on the UK Government's proposed AI Bill, to ensure this technology is used ethically and inclusively to support business and the public sector in Scotland"
- "highlight to the Prime Minister the need for tailored migration solutions for Scotland, to support our economy, communities, and public services".

In a [further letter](#) to the Convenors following the meetings, the First Minister indicated that there was discussion in the Prime Minister and Heads of devolved Governments meeting of "the current situation in Ukraine", and that he had "pressed the Prime Minister on what more could be done to end the conflict in Gaza and ensure humanitarian assistance". The First Minister also stated that there had been "a substantial discussion on growth, during which I called on the Prime Minister to use the forthcoming spending review to ease his fiscal rules and invest across the UK".

The First Minister also gave a short summary of his bilateral meeting with the Prime Minister, saying that they had discussed issues including "the recent US trade deal and EU reset agreement and the forthcoming [UK spending review](#) and [industrial strategy](#)". The First Minister said that he had also:

- raised "concerns" about the [UK Government's Immigration White Paper](#)
- "challenged" the Prime Minister on the UK Government's [proposed welfare reforms](#), and called for "urgent collaborative action to tackle child poverty"
- "pressed for urgent funding for the Acorn cluster"
- raised "concerns" over the UK Government's then-ongoing [review of the UK Internal Market Act 2020](#).

The First Minister also offered a brief overview of the meeting of the Council of the Nations and Regions, stating that discussion had focused on "trade and tariffs and how artificial intelligence can support our public services and stimulate economic growth".

Finance: Interministerial Standing Committee

The Finance: Interministerial Standing Committee (F:ISC) [met on 26 June 2025](#) in London. The meeting was chaired by the Chief Secretary to the Treasury, Rt Hon Darren Jones MP, and it was attended on behalf of the Scottish Government by the Cabinet Secretary for Finance and Local Government, Shona Robison MSP.

The other attendees were the Welsh Government Cabinet Secretary for Finance and Welsh Language, Rt Hon Mark Drakeford MS, and the Minister of Finance in the Northern Ireland Executive, John O'Dowd MLA.

According to the communiqué issued following the meeting, attendees discussed "the outcomes of the UK Government Spending Review and its impacts on Scotland, Wales, Northern Ireland and devolved government budgets", as well as "next steps following the UK Government Spending Review and the path to a budget in the autumn". There was also discussion of "the approach to devolved government fiscal flexibilities".

There was also discussion of the UK Government's recently published Industrial Strategy and 10 Year Infrastructure Strategy. The minutes of the meeting record that "all four Ministers agreed that continued collaboration across these strategies will be essential in their success and in ensuring the delivery of economic growth". The Scottish Government will chair the next meeting of the F:ISC, which is due to be held in the autumn.

In a [letter to the Convenor of the Finance and Public Administration Committee](#) in July 2025, the Cabinet Secretary for Finance and Local Government stated that she had "used this meeting to highlight the ways in which the UK Spending Review settlement for the Scottish Government has added to the challenges facing the Scottish Budget", and had "pushed for further collaboration in ensuring the delivery of economic growth".

Interministerial Group for Business and Industry

The Interministerial Group for Business and Industry [met on 6 May 2025](#). The meeting was attended by Ministers from the UK and Welsh Governments and the Northern Ireland Executive; the Scottish Government was represented by a senior official. The communiqué published on the UK Government records that the following points were discussed:

- the importance of continued partnership and collaboration in the implementation and delivery of the UK industrial strategy
- approaches to place-based policy and how the industrial strategy can promote a thriving UK global market
- the National Wealth Fund and strategic priorities.

Interministerial Group for Net Zero, Energy and Climate Change

The Interministerial Group for Net Zero, Energy and Climate Change also [met on 6 May 2025](#). Gillian Martin MSP, then Acting Cabinet Secretary for Net Zero and Energy, attended on behalf of the Scottish Government. The communiqué published on the UK Government website summarises the discussion as follows:

“ The Interministerial Group considered the future direction and objectives of the UK Emissions Trading Scheme. This involved discussions on the UK Government's EU relations activity, each administration's priorities, challenges, and areas for cross-UK action in meeting the ambitions of the Scheme, including energy from waste.”

Interministerial Group for Housing, Communities and Local Government

The Interministerial Group for Housing, Communities and Local Government [met on 4 June 2025](#). This was the Group's first meeting since the UK General Election in July 2024 (the last meeting having been held in December 2023). The meeting was chaired by Rt

Hon Angela Rayner MP, Deputy Prime Minister and Secretary of State for Housing, Communities and Local Government, and was attended on behalf of the Scottish Government by the Minister for Housing, Paul McLennan MSP.

The communiqué issued following the meeting records that attendees discussed the UK Government's response to the Phase 2 report from the Grenfell Tower Public Inquiry and acknowledged the forthcoming eighth anniversary of the tragedy. Ministers also discussed issues relating to capacity, competency and resilience of key professions in the building control and fire safety sectors, and construction product reform and regulation.

The minutes of the meeting also record that Ministers discussed ways of working between the UK Government and the devolved Governments on these issues, acknowledging the positive working relationship between officials, and agreed for this official level engagement to continue.ⁱ

Common Frameworks

Common Frameworks are intergovernmental agreements which set out how governments will work together to make decisions about policy in certain devolved policy areas, in particular decisions about policy divergence.

They were originally intended to be used to consider matters which were former EU competences, however, [some also state](#) that they may be used to consider related matters within the wider policy area. You can read more about what Common Frameworks are on SPICe's [intergovernmental activity hub](#).

One Common Framework, [Hazardous Substances \(Planning\)](#), has been finalised. Scrutiny of all currently provisionally published frameworks that apply to Scotland has been completed at the Scottish Parliament. Three more planned frameworks that apply to Scotland – the Zootechnics Framework, the Mutual Recognition of Professional Qualifications Framework, and the Services Directive Framework – remain unpublished.

No new framework agreements applicable to Scotland were published during the reporting period. The image below provides an update on frameworks relevant to Scotland and scrutiny of frameworks at the Scottish Parliament.

ⁱ Other interministerial meetings that took place during quarter two of 2025, but for which a communiqué has not yet been published on the UK Government website or where the communiqué was published too late for inclusion in this update, were a meeting of the [Interministerial Standing Committee](#) on 26 June 2025, a meeting of the [Interministerial Group for Health and Social Care](#) on 30 April 2025, a meeting of the [Interministerial Group for Trade](#) on 2 June 2025, a meeting of the [Interministerial Group for Environment, Food and Rural Affairs](#) on 23 June 2025, and the inaugural meeting of the Four Nations [Interministerial Group for Work and Pensions](#) on 26 June 2025.

Common frameworks

Finalised

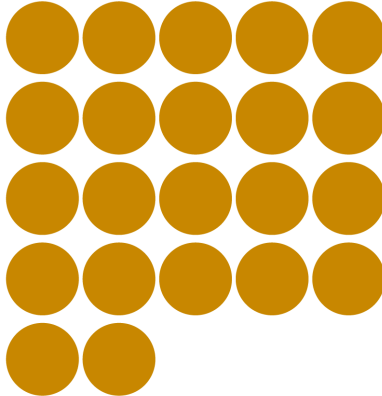
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The UK Government announced in a [written statement to the House of Commons](#) on 12 December 2024 that it was "committed to finishing the Common Frameworks programme as soon as possible" and was aiming to do so by Easter 2025. The statement also committed to "developing closer working relationships and increased transparency between the Government and the devolved Governments on UK internal market matters that impact significantly on devolved responsibilities within Common Frameworks".

The statement further noted that:

“ The [UK] Government considers Common Frameworks to be the key fora for supporting collaborative policy-making processes in the areas they cover, managing policy divergence between the UK's nations where it occurs, and maximising the benefits of taking different, innovative approaches in different parts of the UK.”

In a [position paper on the UK Internal Market Act 2020](#) (UKIMA) published on 3 April 2025, the Scottish Government welcomed the UK Government's commitment to using Common Frameworks as the key mechanism for managing policy divergence and ensuring regulatory co-operation in the areas they cover. However, it argued that UKIMA "does not allow Common Frameworks to perform this role", but instead "conditions and undermines" the Frameworks. It called for the UK Government, as part of [its then ongoing review of the Act](#), to "set out in detail how it proposes to remove the Act's effect from the operation of Common Frameworks".

In its [submission to the review of the Act](#), published on 1 May 2025, the Constitution, Europe, External Affairs and Culture (CEEAC) Committee recommended that the review should address what it concluded was a "lack of clarity" around "the purpose of Common Frameworks given there is little evidence that they are delivering common goals, maximum or minimum standards or harmonisation as initially intended". It also called for greater clarity on "stakeholder engagement in the frameworks process and the role of parliament(s) in holding Ministers to account".

UK internal market

The [UK Internal Market Act 2020](#) (UKIMA) is UK-wide legislation about the flow of goods and services. You can read more about the Act's provisions [in our SPICe briefing](#) and a [SPICe blog](#).

UK Government review of the Internal Market Act

UKIMA contains a statutory requirement for the UK Government to review some provisions of the Act by December 2025. The UK Government announced in a [written statement to the House of Commons on 12 December 2024](#) that it intended to launch this review in January 2025, and that it would aim to complete the review by summer 2025 - earlier than the statutory deadline. The statement set out further detail on the scope of the review:

“ As a statutory minimum, this review must cover use of the powers in Part 1 (Goods) and Part 2 (Services), including the powers to add, delete or amend exclusions from the scope of the Act, and the arrangements relating to the use of the Office of the Internal Market to perform the functions in Part 4 of the Act (covering independent advice and monitoring of the UK Internal Market) . However, the Government recognises the importance of fully considering the operation of the Act beyond the narrow statutory requirements. Therefore, the Government will broaden the scope of the review to include the practical operation of parts 1, 2 and 3 of the Act, including inviting views on the process for considering exclusions from the Act, and the role and functions carried out by the Office for the Internal Market as set out in Part 4.”

On 23 January 2025, the UK Government launched a [consultation seeking views on the operation of certain aspects of UKIMA](#). The consultation closed on 3 April 2025. The consultation confirmed areas which would not be covered by the review, including whether to repeal UKIMA or any part of it, as well as the Act's provisions in areas such as subsidy control and the UK Government's power to provide 'financial assistance' throughout the UK (which has underpinned UK Government spending in Scotland via mechanisms such as the Shared Prosperity Fund).

The Scottish Government published a [position paper on UKIMA](#) on 3 April 2025. This described UKIMA as "the single greatest impediment to more effective and respectful intergovernmental relations". It called for the UK Government to acknowledge the Act's "far-reaching and damaging impact on the devolution settlements", and for the Act to be "repealed and replaced with an equitable, co-designed system built around the Common Frameworks approach". It also criticised what it described as the "unilaterally determined" scope of the review, in particular the decision not to consider repeal of the Act.

On 1 May 2025, the Constitution, Europe, External Affairs and Culture (CEEAC) Committee published its [submission to the review](#) following a [short inquiry](#).ⁱⁱ The Committee recommended that the review "should address the chilling effect on devolved policy innovation" arising from UKIMA,ⁱⁱⁱ and called for more opportunities for parliamentary scrutiny and stakeholder engagement in the process for discussing potential exclusions from the Act's provisions.

ii The UK Government consultation closed on 3 April 2025; however, the Committee was granted an extension to provide its submission after the closing deadline.

iii This recommendation was agreed by division. See paragraph 40 of the submission.

The UK Government published its [response to the review](#) in July 2025. In a foreword to the response, the UK Government Minister Rt Hon Douglas Alexander MP wrote:

“ I recognise the very real concerns that have been raised about how the UK internal market has been managed to date. That is why this report describes how we plan to facilitate a more transparent, proportionate, and pragmatic framework, fostering open policy discussions between UK Government and devolved Governments, with greater clarity for and engagement with businesses and other stakeholders.”

The response stated that the consultation had found "general support" for UKIMA's market access principles and a recognition of "the important role they play in facilitating the smooth trade of goods and provision of services across the UK". However, it also noted that many respondents had wanted to see "improvements in the way that exclusions from the market access principles are considered and agreed". The response said that the UK Government would make the following changes in response to concerns raised in the consultation:

- implement exclusions that have been agreed by all Governments within a Common Framework
- consider environmental protection and public health factors when determining exclusions, alongside economic impacts
- establish a Minimum Economic Impact process for considering smaller exclusions, and implement them where all Governments agree the exclusion has an economic impact of less than £10 million a year
- implement a “reserve” exclusions process where it has not been possible for all four Governments to reach agreement on an exclusion
- work with the devolved Governments to agree processes for how all four Governments engage with businesses and other stakeholders on matters being discussed in Common Frameworks
- work with the devolved Governments to agree a process for all four Governments to jointly refer UK internal market matters for advice to the Office for the Internal Market.

Windsor Framework Review

In January 2025, the Secretary of State for Northern Ireland, Rt Hon Hilary Benn MP, commissioned an Independent Review of the Windsor Framework.

The Windsor Framework is an agreement between the UK Government and the European Commission which makes changes to the operation of the [Northern Ireland Protocol](#) (which set out Northern Ireland's post-Brexit relationship with the EU and Great Britain as part of the UK's exit from the EU). This [SPICe blog from March 2023](#) sets out more detail about the Framework and its implications for Scotland.

The Review was led by the Rt Hon Lord Murphy of Torfaen. According to the Review's [Terms of Reference](#), its purpose is:

“ To provide the Government with a report of its conclusions on the functioning of the Windsor Framework arrangements and its implications on social, economic and political life in Northern Ireland.”

Following the Secretary of State receiving the Review's final report, there is a statutory obligation (under Paragraph 21 of [Schedule 6A to the Northern Ireland Act 1998](#)) on the UK Government to: publish the report; lay a copy of the report before the UK Parliament; and transmit a copy of the report to the Speaker of the Northern Ireland Assembly. The Speaker of the Assembly must in turn lay a copy of the report before the Assembly.

In answer to a [written question](#) in the House of Commons in July 2025, the Secretary of State for Northern Ireland confirmed that the UK Government had received the final report from the Review on 9 July 2025 and would "publish it in full accordance with its existing obligations to do so". There is also a statutory obligation on the Secretary of State to publish a written response to any recommendations made in the report within six months of receiving it.

UK Internal Market Act exclusions

A [process has been established](#) by which the UK Government and devolved governments can consider exclusions to the UKIMA market access principles. Read more about the interaction between the exclusions process and Common Frameworks [in our SPICe blog](#) from March 2023.

UK Internal Market Act 2020 exclusions

Exclusions operating

Single use plastics Heat networks



Exclusions agreed but not yet operating

Rodent glue traps



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Deposit Return Scheme

Discussions about a UKIMA exclusion relating to a Scottish Deposit Return Scheme (DRS) for drinks containers took place during 2023. The UK Government [offered a temporary, narrower exclusion](#) than the one requested by the Scottish Government, which the Scottish Government [cited as the reason](#) for its delay of the scheme.

See SPICe blogs from 2023 for [background about the scheme](#) and [further information about intergovernmental discussions](#) regarding an exclusion.

Following the UK Government's exclusion decision, the Scottish Government said it would align its scheme with UK-wide DRS plans. The UK Government, Scottish Government, Welsh Government and Northern Ireland Department of Agriculture, Environment and Rural Affairs (DAERA) agreed in an April 2024 [joint policy statement](#) to launch interoperable deposit return schemes covering the whole of the UK in October 2027.

The Welsh Government [subsequently announced](#) in November 2024 that it would not proceed with the joint process and would instead pursue its own scheme that includes glass.^{iv}

In January 2025, the UK Parliament approved the [Draft Deposit Scheme for Drinks Containers \(England and Northern Ireland\) Regulations 2024](#), which establish a DRS for drinks containers in England and Northern Ireland.

On 2 May 2025, the Scottish Government laid two draft statutory instruments before the Scottish Parliament, the [Deposit and Return Scheme for Scotland Amendment Regulations 2025](#) and the [Deposit and Return Scheme for Scotland \(Designation of Scheme Administrator\) Order 2025](#).

These instruments amended the original legal framework for a Scottish DRS, as set out in the [Deposit and Return Scheme for Scotland Regulations 2020](#), to give effect to the policy positions set out in the April 2024 joint policy statement. Following [consideration by the Net Zero, Energy and Transport Committee](#), the instruments came into effect on 20 June 2025.

The Scottish Government has designated [UK Deposit Management Organisation Limited](#) as the scheme administrator for Scotland's DRS. The organisation was also [appointed as the deposit management organisation](#) for England and Northern Ireland in May 2025. The appointment followed an application process that was assessed by the UK Government, the Scottish Government and DAERA in Northern Ireland.

More information about progress towards establishing a DRS in Scotland can be found on the [Scottish Government's website](#).

Glue traps

The [Wildlife Management and Muirburn \(Scotland\) Act 2024](#) provides for bans on the purchase, sale, and use of rodent glue traps. The [Q1 2024](#) intergovernmental activity update and [SPICe briefing on the Bill ahead of Stage 3](#) debate summarise the discussions about glue traps and a potential UKIMA exclusion relating to the sale of glue traps during the then Bill's parliamentary process.

The previous UK Government did not agree to a UKIMA exclusion. In a [March 2024 letter to Rt Hon Steve Barclay MP](#) (then-Secretary of State for Environment, Food and Rural Affairs), Shona Robison MSP (then Deputy First Minister and Cabinet Secretary for Finance) noted the UK Government's view that:

“ The UK Government does not consider that the evidence presented demonstrates that a ban on the sale of glue traps would be substantially more effective than a ban focused on their use and possession. Therefore, the UK Government does not believe that an exclusion under the UKIM Act is necessary to achieve the policy aims of restricting the use of these traps in Scotland.”

In response, the Cabinet Secretary suggested that the UK Government was using UKIMA "to effectively overturn a policy approved by the Scottish Parliament", and argued that:

“ It is not credible to claim that this decision is intended to avoid trade barriers and unnecessary disruption of economic and trade flows, given that in this case, the trade and economic impact is negligible to non-existent.”

iv A subsequent [written statement](#) by the Welsh Government in July 2025 indicated that it would accelerate its timetable for implementation of a Welsh DRS to align with the rest of the UK, and would take a "phased approach" to the inclusion of glass in the scheme.

In a [written statement to the House of Commons on 12 December 2024](#) announcing the new UK Government's review of the UK Internal Market Act 2020, Rt Hon Douglas Alexander MP (Minister of State at the Cabinet Office) indicated that the UK Government would take forward “an initial package of measures to demonstrate a more pragmatic approach” to managing the UK internal market. The statement noted that this package would include:

“ Agreeing an exclusion from the UK Internal Market Act's market access principles regarding the sale of rodent glue traps, in response to the Scottish Government's previous proposal, as this Government recognises this proposal has a minimal economic impact on trade within the UK.”

However, at the time of publication, the necessary regulations have not yet been introduced by the UK Government to put the exclusion into law.

Non-surgical cosmetic procedures

The Scottish Government's [Programme for Government 2025-26](#), published on 6 May 2025, indicated that it would introduce a Bill to regulate the delivery of non-surgical cosmetic procedures. This followed a [consultation on the subject](#) held between December 2024 and February 2025. As part of its [analysis of and response to](#) that consultation, published on 25 June 2025, the Scottish Government noted the following in relation to the UK Internal Market Act:

“ The Scottish Government is considering if UKIMA presents a challenge to the intentions set out in section 3 of this paper, especially the proposals to require practitioners of non-surgical cosmetic procedures to meet specific training and qualification standards, and for certain procedures to be undertaken by certain healthcare professionals. The legislation that the Scottish Government introduces in the coming months will seek to implement the proposals as fully as possible. Where appropriate, this may lay the groundwork to implement some parts of the proposals at a future point, especially where UKIMA may make any aspects of the proposals unworkable or unenforceable. The Scottish Government intends to work with the UK Government and other devolved administrations on this issue.”

Regulatory developments

This section summarises other intergovernmental activity to help manage the UK internal market. The Office for the Internal Market (part of the Competition and Markets Authority) has published a [regulatory developments dashboard](#) showing potential regulatory differences that it is tracking.

Wet wipes containing plastic

The [United Kingdom Internal Market Act 2020 \(Exclusions from Market Access Principles: Single-Use Plastics\) Regulations 2022](#), which came into force in August 2022, provided for an exclusion from the UKIMA market access principles for many single-use plastic items (such as plastic cutlery, plastic drinking straws, and polystyrene food and drinks containers) that had previously been banned in Scotland (as of June 2022) under the [Environmental Protection \(Single-use Plastic Products\) \(Scotland\) Regulations 2021](#).^v

However, the 2022 Regulations did not provide for an exclusion from the market access principles for other single-use plastic products, such as disposable vapes (see below) or wet wipes containing plastic.

Between October 2023 and November 2023, the UK, Scottish and Welsh Governments and the Department of Agriculture, Environment and Rural Affairs for Northern Ireland conducted a [joint consultation](#) seeking views on a proposed ban on the manufacture, supply and sale of wet wipes containing plastic. A [joint response](#) in April 2024 stated that their supply and sale would be banned, with each administration introducing regulations separately.

In April 2025, the Acting Minister for Climate Action, Alasdair Allan MSP, [confirmed that the Scottish Government](#) was continuing to work "across the four nations to put an end to pollution caused by wet wipes containing plastic, with legislation forthcoming". In June 2025, [regulations were passed in Wales](#) implementing the ban there with effect from December 2026.

Disposable vapes

Following a [joint consultation](#) by the UK, Scottish and Welsh Governments launched in October 2023, the Scottish Government [announced in February 2024](#) that it planned to ban the sale and supply of disposable vapes in Scotland from April 2025. The Scottish Government laid the [draft Environmental Protection \(Single-use Vapes\) \(Scotland\) Regulations 2024](#) in June 2024, which were due to come into force on 1 April 2025.

However, following the separate introduction in each of England, Wales and Northern Ireland of regulations implementing an equivalent ban from 1 June 2025, the Scottish Government announced that it would [delay implementation of the ban in Scotland](#) to ensure it came into effect on the same date in all four nations. The necessary regulations to do this (the [Environmental Protection \(Injurious Articles\) \(Fixed Penalty Notices and Miscellaneous Amendments\) \(Scotland\) Regulations 2025](#)) came into force in March 2025. The ban on the sale and supply of single-use vapes subsequently [came into force in Scotland on 1 June 2025](#).

Chemicals

The UK Government has indicated its intention to consult on the possibility of adopting a consistent approach across the UK in relation to the classification, labelling and packaging regimes for chemicals. In January 2025, the Secretary of State for Northern Ireland, Rt Hon Hilary Benn MP, stated in a [written statement to the House of Commons](#) that the UK Government would:

“ take the steps necessary to avoid new barriers arising within the UK internal market through our classification, labelling and packaging regimes for chemicals. As part of this, the Government will explicitly consult on applying a consistent regime across the United Kingdom, should this be required to safeguard the UK internal market.”

On 23 June 2025, the Health and Safety Executive launched a [consultation on chemicals legislative reform](#), including in relation to classification, labelling and packaging (CLP). As part of this, it sought views on recent changes to the EU's CLP regime, their potential impact on the UK internal market, and the merits of applying a consistent regime across

v An [October 2022 SPICe blog](#) considers the UKIMA implications of Scotland's ban on single-use plastics in more detail.

the UK. It stated that this call for views was "distinct from but complements" the UK Government's commitment to explicitly consult on applying a consistent CLP regime across the UK, should this be required to safeguard the UK internal market. The HSE consultation is open until 18 August 2025.

Food labelling

Following a consultation carried out under the previous Conservative administration, the UK Government stated in September 2024 that it would not introduce mandatory 'not for EU' labelling for some food products in Great Britain (as is [required in Northern Ireland](#) following the UK's exit from the EU), but would seek to [take powers to do so](#) in the future "in a targeted way, if there is evidence of need" to ensure the continued supply of these goods into Northern Ireland.

On 5 June 2025, the UK Government laid the necessary regulations to give UK Ministers this power (the [Marking of Retail Goods Regulations 2025](#)), while [stating that](#), as food labelling is a devolved matter, the views of Scottish and Welsh Ministers "will be a key part of any decision to apply labelling in Great Britain", as set out in an [intergovernmental concordat](#).

The Cabinet Secretary for Constitution, External Affairs and Culture, Angus Robertson MSP, wrote to the Convenor of the Rural Affairs and Islands Committee [on 6 June 2025](#), in line with the [Statutory Instrument Protocol](#) agreed between the Scottish Government and the Scottish Parliament, setting out the reasons why the Scottish Government proposed to consent to UK Ministers making the regulations. The Committee [subsequently confirmed](#) it was content with the Scottish Ministers' decision to give consent.

However, giving evidence to the Constitution, Europe, External Affairs and Culture Committee on 19 June, the Cabinet Secretary [criticised the UK Government's engagement](#) with the Scottish Government on this issue, describing it as "another example of where the [intergovernmental] process is not working properly".

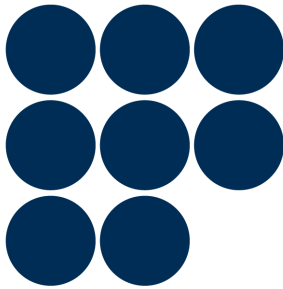
The UK Government [has also suggested](#) that its intention to agree a sanitary and phytosanitary (SPS) agreement with the EU, as provided for by the outcome of [the UK-EU Summit in May 2025](#), will "reduce the need for this labelling".

Legislative consent

Legislative consent Q2 2025

Legislative Consent

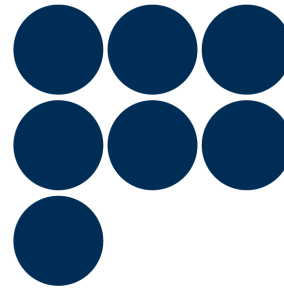
Legislative Consent
granted



Partial Legislative
Consent **granted**



Legislative consent
memorandums **lodged**



Scottish Parliament Information Centre

According to the Sewel Convention, the UK Parliament will not normally legislate on devolved matters without the consent of the Scottish Parliament. The Scottish Parliament's standing orders set down rules which apply where UK primary legislation requires the Parliament's consent under the Sewel Convention. They apply where UK primary legislation makes 'relevant provision', which means provision which applies to Scotland in any of the following ways:

- for any purpose within the legislative competence of the Scottish Parliament
- to alter the legislative competence of the Scottish Parliament
- to alter the executive competence of the Scottish Ministers.

When any of the criteria on relevant provision are fulfilled, the Scottish Government is obliged to lodge a legislative consent memorandum. A legislative consent memorandum, amongst other things, sets out the Scottish Government's view on whether the Parliament should grant legislative consent.

Following the lodging of the memorandum, Members of the Scottish Parliament may vote on a legislative consent motion to either grant or withhold consent for the Bill.

Find out more about legislative consent on the [Scottish Parliament's website](#), and in this [November 2024 SPICe blog](#). SPICe has also developed two tools that can be used to track legislative consent at the Scottish Parliament, which can be accessed on SPICe's [intergovernmental activity hub](#).

During quarter two of 2025, the Scottish Government lodged seven legislative consent memorandums in relation to six Bills (three of which were supplementary memorandums).

Legislative consent memorandums lodged during Q2 2025

Bill title	Date memorandum lodged	Consent recommendation by Scottish Government
Employment Rights Bill - supplementary memorandum	3 April 2025	Consent recommended
Crime and Policing Bill	16 May 2025	Partial consent recommended ^{vi}
Product Regulation and Metrology Bill - second supplementary memorandum	29 May 2025	Consent recommended
Animal Welfare (Import of Dogs, Cats and Ferrets) Bill	3 June 2025	Consent recommended
Crime and Policing Bill - supplementary memorandum	12 June 2025	Consent recommended ^{vii}
Absent Voting (Elections in Scotland and Wales) Bill	12 June 2025	Consent recommended
Children's Wellbeing and Schools Bill	12 June 2025	Consent recommended

Nine legislative consent motions were considered by the Parliament.

Legislative consent motions considered during Q2 2025

Bill title	Date motion considered	Consent decision
Data (Use and Access) Bill	1 April 2025	Consent granted
Tobacco and Vapes Bill	29 May 2025	Consent granted
Absent Voting (Elections in Scotland and Wales) Bill	25 June 2025	Consent granted
Animal Welfare (Import of Dogs, Cats and Ferrets) Bill	25 June 2025	Consent granted
Public Authorities (Fraud, Error and Recovery) Bill	25 June 2025	Partial consent granted ^{viii}
Employment Rights Bill	26 June 2025	Consent granted
Border Security, Asylum and Immigration Bill	26 June 2025	Consent granted
Product Regulation and Metrology Bill	26 June 2025	Consent granted
Children's Wellbeing and Schools Bill	26 June 2025	Consent granted

vi The memorandum recommends consent to some, but not all, relevant provisions.

vii While the supplementary memorandum recommends consent to relevant clauses added into the Bill at the Public Bill Committee stage in the House of Commons, it does not update the Scottish Government's position in relation to those provisions to which it did not recommend consent in the original memorandum.

viii The legislative consent motion agreed to by the Parliament did not cover certain provisions of the Bill relating to overpayment recovery. According to the Scottish Government's [legislative consent memorandum for the Bill](#), lodged in March 2025, these provisions "are subject to ongoing discussion and will be the subject of a supplementary legislative consent motion".

Further information

Information within this intergovernmental update is primarily based on the following sources:

- The UK Government [intergovernmental relations website](#) contains minutes of interministerial groups and standing committees. Minutes of other intergovernmental meetings are not currently published and hence are not reflected in this update.
- The UK Government [Common Frameworks website](#) contains Common Framework agreements.
- The Scottish Parliament [legislative consent website](#) lists legislative consent memorandums and associated motions.

Further information on intergovernmental activity can be found on our [intergovernmental activity hub](#) and:

- SPICe [briefing on intergovernmental relations](#)
- House of Commons Library [briefing on intergovernmental relations](#)
- UK Government [transparency reports on intergovernmental relations](#)
- Senedd [Legislation, Justice and Constitution Committee Monitoring reports](#)
- Northern Ireland Assembly [Brexit and Beyond newsletters](#).

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