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AK Position Paper

# BAK Position Paper on BREXIT

## About us

**The Austrian Federal Chamber of Labour is by law representing the interests of about 3.6 million employees and consumers in Austria. It acts for the interests of its members in fields of social-, educational-, economical-, and consumer issues both on the national and on the EU-level in Brussels. Furthermore the Austrian Federal Chamber of Labour is a part of the Austrian social partnership. The Austrian Federal Chamber of Labour is registered at the EU Transparency Register under the number 23869471911-54.**

**The AK EUROPA office in Brussels was established in 1991 to bring forward the interests of all its members directly vis-à-vis the European Institutions.**

### **Organisation and Tasks of the Austrian Federal Chamber of Labour**

The Austrian Federal Chamber of Labour is the umbrella organisation of the nine regional Chambers of Labour in Austria, which have together the statutory mandate to represent the interests of their members.

The Chambers of Labour provide their members a broad range of services, including for instance advice on matters of labour law, consumer rights, social insurance and educational matters.

Renate Anderl  
President

More than three quarters of the 2 million member-consultations carried out each year concern labour-, social insurance- and insolvency law. Furthermore the Austrian Federal Chamber of Labour makes use of its vested right to state its opinion in the legislation process of the European Union and in Austria in order to shape the interests of the employees and consumers towards the legislator.

All Austrian employees are subject to compulsory membership. The member fee is determined by law and is amounting to 0.5% of the members' gross wages or salaries (up to the social security payroll tax cap maximum). 816.000 - amongst others unemployed, persons on maternity (paternity) leave, community and military service - of the 3.6 million members are exempt from subscription payment, but are entitled to all services provided by the Austrian Federal Chambers of Labour.

Christoph Klein  
Director

## Executive Summary

On 29 March 2017, the United Kingdom officially informed the EU of its intention to leave the EU. According to Article 50 of the EU Treaty, EU membership expires no later than two years after this communication. **The BAK regrets the decision of the United Kingdom to leave the EU and advocates keeping open the possibility of remaining in the EU.**

The Brexit vote was a warning signal. Many Britons did not see their expectations of European politics fulfilled. In recent years, many people have experienced a deterioration in their living and working conditions. Also, from the point of view of the BAK, the interests of workers and consumers in the EU are neglected. However, individual countries leaving the EU cannot be the solution to the problems in Europe. **Brexit should provide the impetus to put social and ecological goals at the centre of EU policy in the future.**

There is currently no indication that the Brexit decision will be reversed. The United Kingdom is expected to leave the EU on 30 March 2019. In order to avoid chaos and create legal certainty, the EU and the UK want to conclude a withdrawal agreement to regulate the immediate consequences of Brexit. **The BAK welcomes the progress made so far with regard to the withdrawal agreement.**

In particular, the BAK welcomes the fact that the rights of EU citizens residing in the UK and UK citizens living in the EU will be respected, as well as the agree-

ment of a transition period until 31 December 2020, during which the UK will continue to apply EU law, but without having a say in the EU. The BAK points out that the duration of the transition period may not be sufficient to determine future cooperation between the EU and the UK. **The BAK is in favour of keeping open the possibility of extending the transition period beyond 31 December 2020.**

With regard to **future relations**, the United Kingdom has announced its intention to remain neither in the European Single Market (EEA) nor in the European Customs Union. **The BAK is in favour of keeping open the possibility of the United Kingdom remaining in the European Single Market and/or in the European Customs Union.**

If the rules of the European Single Market do not apply to the UK in the future, there is a **danger of deregulation** in the UK in important areas such as labour law, social protection and environmental protection. In addition, in the struggle for competitiveness, the UK could rely on tax dumping. Such an agenda would not only be unacceptable to British workers but would lead to a **race to the bottom** and also put the rights of workers in the EU under pressure. **Such a development must be avoided from the point of view of the BAK.**

**The BAK is in favour of close future cooperation between the EU and the United Kingdom.** It should cover many areas, with particular attention to trade

and economic relations. The BAK demands that trade in goods and services be designed in such a way that **workers' and consumers' rights, as well as environmental and climate protection, are safeguarded**. The approach taken in existing EU free trade agreements would not be appropriate because it does not protect these rights sufficiently.

With regard to **future economic and trade relations** between the EU and the United Kingdom, the BAK demands: a future agreement must ...

- ... contain **binding provisions protecting workers, consumers and the environment**. The United Kingdom must be required to continue to apply EU standards in order to avoid unfair competition. Existing rights must be protected by a **non-regression clause**.
- ... create a **level playing field** for both contracting parties. Robust guarantees in terms of competition and state aid as well as tax, social, environmental and regulatory measures and practices are needed.
- ... with regard to **market access for services**, stipulate that the **rules** of the state in which the service is provided are to be complied with (**host country**).
- ... **ensure the financial stability of the EU**. The UK needs to continue to apply **EU standards** in regulating and supervising the financial market when seeking access to the European Single Market for financial services.

- ... with regard to the **temporary residence of workers** in connection with the **provision of services**, specify that the **terms and conditions of employment of the host Member State** are to be respected. The future agreement must contain provisions against wage and social dumping and provide for cross-border cooperation between authorities and administrative penalties in case of non-compliance.
- ... contain **effective enforcement mechanisms** for workers' and consumers' rights enshrined in the future agreement and provide for **effective sanction mechanisms** in case of infringement.
- **Privileges for investors** and investor-state arbitration are to be **rejected**.

From the point of view of the BAK, future **cooperation** between the EU and the UK should **not only include business and trade**. It requires, inter alia, agreements on the movement of persons, the coordination of social security, and the recognition of professional qualifications, as well as a regulation on air transport and other modes of transport.

The EU should also address issues in the negotiations with the UK that are not regulated by EU law: BAK demands the **ending of tax exemption in the British Overseas Territories** and a waiver of any tax dumping policy. The United Kingdom should also remain a contracting party to the **European Convention on Human Rights and the European Social Charter**.

# AK's position in detail

## 1. The Brexit referendum

Safe jobs with good working conditions and good public health care are basic needs of working people anywhere in Europe. On 23 June 2016, a narrow majority of Britons voted in favour of leaving the EU in the Brexit referendum. This was, not least of all, because the exit proponents promised improvements in these areas. One announcement was that by eliminating payments to the EU budget, the National Health Service (NHS) could finally be adequately funded. But first and foremost, the referendum was about immigration. For many British workers living with decades of neoliberal policies, de-industrialisation and brutal austerity, the benefits of leaving the EU seemed obvious. Between 2007 and 2015, real wages in the United Kingdom fell by more than a tenth.<sup>1</sup> Many people are employed in precarious jobs and barely make ends meet. The rigid austerity policies in many countries as a result of the economic and financial crisis from 2008 onwards were a major cause for the rise of right-wing populist and EU-sceptical currents across Europe. The anti-EU party, the United Kingdom Independence Party (UKIP) reached around 13% in the 2015 general election. The initiative for the Brexit referendum ultimately came from Prime Minister David Cameron, but campaigns against (EU) migrants had paved the way and contributed significantly to its outcome. Since 2013, there had been a strong increase in the immigration of EU migrants to the United Kingdom.<sup>2</sup> Although the economy grew from this time and unemployment fell<sup>3</sup>,

the positive development did not reach many people. The EU free movement of persons was a reason for many people to vote against remaining in the EU. Another buzzword of the Brexit campaign was "control". The EU withdrawal was promoted by its supporters by saying that the United Kingdom would regain control of its legislation and would no longer be "overruled" by legislation from Brussels and the European Court of Justice.

The Brexit referendum voted 52% for leaving the EU and around 48% for remaining in the EU. There is an allegation of misuse of data from Facebook users and vote manipulation against the Leave campaign, which had worked with the data analysis company "Aggregate IQ". In addition, the electoral authority is determining whether any breach of funding rules has occurred. If the allegations are confirmed, the majority for EU withdrawal would be questionable in view of the narrow outcome of the referendum. The Brexit referendum has revealed deep divisions in British society, along age, education and class, as well as regions. The "Leave" votes were not mere protest votes. The Euroscepticism of many people is also based on a legitimate criticism, which refers to the fact that, in the EU, the interests of the economy are in the foreground, compared to social concerns. The key question, however, is: will exit from the EU bring the hoped-for improvements?

## 2. Future perspectives for workers – better with or without EU?

While EU policy in the 1990s was still considered to be a source of hope for the consolidation and further development of the European welfare state, from the point of view of the BAK this is no longer the case today in the same way. The interests of workers and consumers as well as environmental and climate protection regularly fall short in EU legislation and EU trade agreements. The fact that EU policy is strongly geared towards economic interests does not mean, however, that individual states, after leaving the EU, would implement a policy in favour of workers, consumers and the environment. The Brexit vote was a warning signal. Many Britons did not see their expectations of European politics fulfilled. In recent years, many people have experienced a deterioration in their living and working conditions. However, individual countries leaving the EU cannot be the solution to the problems in Europe. **The BAK regrets the decision of the United Kingdom to leave the EU and advocates keeping open the possibility of remaining in the EU.**

There are doubts that the expectations of those Britons who voted for Brexit in the hope of improving their living and working conditions will be met. Politics in the United Kingdom is strongly neo-liberal. In the last forty years, improvements in employment law have often been implemented solely on the basis of EU regulations. An example is the EU Working Time Directive. Without the Working Time Directive there would be almost no legal protection against long hours of work and no legal requirements for rest or paid holiday in the United Kingdom<sup>4</sup>. Many other workers' rights were introduced solely on the basis of EU

legislative initiatives. In the future, such rules could be abolished if the United Kingdom is no longer bound by EU law. The British trade union movement, in the run-up to the Brexit referendum, therefore came out in favour of remaining in the EU, warning of job losses and a weakening of workers' rights. However, this message was only partially heeded, while for many people the need to cast a single vote "against the elite" through a single vote against the EU outweighed this. **Brexit should provide impetus to put social and ecological goals at the centre of EU policy in the future.**

## 3. Brexit is getting closer – the withdrawal agreement

On 29 March 2017, British Prime Minister Theresa May officially informed the European Council about the UK's intention to leave the EU. According to Article 50 of the EU Treaty, EU membership expires no later than two years after this communication. EU leaders Juncker and Tusk informed the United Kingdom that all doors remain open to stay in the EU. There is currently no evidence that the Brexit decision will be reversed. The United Kingdom is expected to leave the EU on 30 March 2019. In order to avoid chaos and create legal certainty, the EU and the United Kingdom want to conclude a withdrawal agreement to regulate the immediate consequences of Brexit. **The BAK welcomes the progress made so far with regard to the withdrawal agreement.**

The three main topics of exit are citizens' rights, the final bill, and the border between Ireland and Northern Ireland. On 8 December 2017, Juncker and May gave a basic statement on these topics. At the beginning of 2018, initial draft texts for the withdrawal agreement were submitted.<sup>5</sup> While concrete results

were achieved in the negotiations on the first two issues, there is still no solution for the border between Ireland and Northern Ireland. There is nothing less than peace at stake on the island of Ireland. Both the United Kingdom and the Republic of Ireland joined the European Economic Community on 1 January 1973. The two states are not members of the Schengen Agreement, but they have a "Common Travel Area". No border checks are carried out between Northern Ireland and the Republic of Ireland. In the future, however, it will be an external EU border and customs controls will be required.

There is a strong desire on all sides to avoid a hard border. The Joint Report of 8 December 2017 stated that, unless specific solutions are found, a hard border could be avoided by aligning with the rules of the internal market and the European Customs Union. As no specific solutions have been found so far, the EU proposes that Northern Ireland remain in the European Customs Union. Customs controls between Ireland and Northern Ireland would not be necessary in this case, but there would have to be controls between the island of Ireland and the rest of the United Kingdom. The agreement on a special status for Northern Ireland is a sensitive point, however, not least due to the domestic political situation – the governing party of Prime Minister Theresa May has been in a minority government supported by the Northern Irish Unionist party DUP since the general elections in June 2017. The withdrawal agreement must be negotiated and ready by autumn 2018 so that it can be signed and ratified in good time before the deadline of 30 March 2019. As long as there is no solution to the question of the border between Ireland and Northern Ireland, there is still the danger of a "hard Brexit". With

regard to the withdrawal agreement: **Nothing is agreed until everything is agreed.**

On many exit issues the EU and the United Kingdom have already reached an agreement. The BAK welcomes the agreement regarding the final bill. In particular, the BAK welcomes the safeguarding of the rights of EU citizens residing in the United Kingdom and UK citizens living in the EU and the agreement of a transition period until 31 December 2020, during which time the United Kingdom will continue to apply EU law, without however having a say in the EU. The BAK points out that the duration of the transition period may not be sufficient to define future cooperation between the EU and the United Kingdom. **The BAK is in favour of keeping open the possibility of extending the transition period beyond 31 December 2020.**

The Citizens' Rights Directive 2004/38/EC sets out the conditions under which EU citizens and their family members may exercise the right of free movement and residence within the territory of the EU Member States and the right of permanent residence. The Freedom of Movement of Workers Regulation (EU) 492/2011 regulates (among other things) the equal treatment of EU citizens in terms of working conditions and social and tax advantages. Regulation (EC) 883/2004 regulates the coordination of social security systems. These acts of EU legislation would no longer apply to the United Kingdom in the future. However, if the withdrawal agreement is concluded, it will ensure continuity for EU citizens living in the United Kingdom before 31 December 2020 and those UK citizens living in the EU. In the event of any ambiguity in the interpretation of citizens' rights enshrined in the

withdrawal agreement, UK courts may submit preliminary rulings to the CJEU for a maximum of eight years after the end of the transition period.

#### 4. The EU and its contradictions

The withdrawal agreement is intended to address the immediate consequences of Brexit. There is still uncertainty about what EU-UK cooperation will look like in the future. Both sides are striving for close cooperation. But how is cooperation within the EU different from cooperation outside the EU? Can a debate about leaving the EU leave aside the question of what the EU really is? This was the case during the Brexit referendum. Many EU regulations shape our lives and everyday existence in such a matter-of-course way that we are hardly aware they exist. Debates on the EU are often launched solely by negative headlines. Very few people, however, have an overall picture of the functioning of the EU. In the weeks and months after the Brexit referendum, the many spheres of life that are shaped by EU regulations and for which solutions have to be sought as a result of the withdrawal gradually came to light. Two examples: while within the EU goods pass through borders without customs controls, this is not the case with non-member countries. While banks established in one EU Member State are allowed to provide services in all other Member States with minimal additional approval requirements, this is not the case for banks established in non-member countries.

The EU was founded as an economic community in the aftermath of World War II. Later, more and more policies were added, and a very close cooperation developed between Member States. The creation of the European

Economic Community in 1957 introduced the free movement of goods between Member States. Tariffs and import and export restrictions (quotas) between Member States have been abolished. With regard to non-member countries, the creation of the European Customs Union established a common external tariff. The EU also pursues a common trade policy, with individual Member States not concluding trade agreements with third countries.

The **European Single Market** encompasses much more than the free movement of goods. It is a single market which guarantees the free movement of goods, services, capital and persons (the **“four market freedoms”**). Non-tariff barriers to trade (differences in national rules that hinder trade, apart from customs duties) have largely been eliminated through harmonisation and/or mutual recognition of national rules. The freedom to provide services allows a company established in one Member State to offer and provide services across borders in all other Member States under the same conditions as those imposed by a Member State on its own nationals. Furthermore, there is the right to set up and run a business in another Member State under the same rules that it has established for its own citizens (freedom of establishment). The free movement of capital makes it possible to invest capital in all Member States. Citizens of an EU member state may live and work in all Member States (free movement of persons). The Customs Union is the “protective outer shell” of the single market vis-à-vis third countries. **As a result of Brexit, the four market freedoms no longer apply in relation to the United Kingdom.**

From the point of view of the BAK, the single market brings advantages and disadvantages for workers and consumers. Positive effects are greater choice and falling prices for many goods and services. However, from the point of view of the BAK, a fundamental **design error of the EU** is that the four market freedoms of the internal market are superior to social concerns. In recent years, the CJEU has held in some judgments (“Viking” and “Laval”) that market freedoms take precedence over fundamental rights and trade union rights. The BAK therefore calls for an amendment of the EU treaties and a **social progress protocol**, so that in the future social rights take precedence over the market freedoms. The proclamation of the “European Pillar of Social Rights” at the EU Social Summit in Gothenburg in November 2017 does not bring fundamental improvement, because the “Pillar” is merely a non-binding principle. Ultimately, the EU’s social deficit was also one of the causes of Brexit.

The **economic and financial crisis**, which began in 2008, **exacerbated the EU’s social deficit** and pushed for the reduction of labour market and social standards. The costs of the crisis were not imposed on those responsible for the crisis, such as the financial sector, but had to be borne by workers and the unemployed. While the introduction of a financial transaction tax has failed, structural reforms have been implemented with painful interventions in social security and pension systems. A particularly rigid austerity policy was imposed on those Member States that received money from the bailouts. From the point of view of the BAK, the economic policy coordination instruments of the EU, newly introduced from 2011 (“European Semester”), also show serious shortcomings both in their eco-

nomic orientation and their democratic legitimacy (for example, the European Parliament only has rights of consultation).

The four market freedoms of the single market promote competition because suppliers of goods and services from all Member States compete with one another in a common market. The fact that companies take advantage of different pay levels and social standards within the EU (partly in legal, partly in illegal ways) is one of the downsides of the single market. There is potentially a risk of downward competition to the detriment of all workers. The BAK has been calling for better regulations and controls for years. However, certain “rules of the game” in the internal market are strictly controlled by the EU, such as the ban on cartels and the ban on state aid to businesses. **As a result of Brexit, the rules of the single market for the United Kingdom will cease to apply in the future. However, access to the internal market will also be lost or has yet to be renegotiated.**

If the EU’s “rules of the game” no longer apply to the United Kingdom in the future, there is a **danger of deregulation** in the UK in important areas such as labour law, social protection and environmental protection. In addition, in the struggle for competitiveness, the UK could rely on tax dumping. Such an agenda would not only be unacceptable to British workers but would lead to a race to the bottom and also put the rights of workers in the EU under pressure. **Such a development must be avoided from the point of view of the BAK.**

## 5. Future relations between the EU and the UK - Avoiding downward competition at the expense of workers

There is still much uncertainty about the future relationship between the EU and the UK. The withdrawal agreement will be accompanied by a political declaration which sets the framework for future relations. Specific negotiations can begin, at the earliest, from 30 March 2019 after leaving the EU.

Participation in the European Single Market is possible without EU membership or participation in the European Customs Union, as is the case with the EEA countries Norway, Iceland and Liechtenstein. The prerequisites are, however, the adoption of the relevant EU law, submission to the case law of the European Court of Justice (or the EFTA Court), and the payment of financial contributions. The United Kingdom has already announced that it will not participate in the European Single Market in the future. Furthermore, the United Kingdom has announced that it will not remain in the European Customs Union. Abiding by the EU external tariff would conflict with an independent trade policy: if the EU concludes a free trade agreement with a third country (such as CETA), the elimination of import duties into the EU, as agreed in the agreement, would automatically apply to the United Kingdom as well; however, as the UK as a future non-EU member would not be a party to EU free trade agreements, the third country should continue to collect import duties from the United Kingdom.

**The BAK is in favour of keeping open the possibility of the United Kingdom remaining in the European Single Market and/or in the European Customs Union.**

From the point of view of the BAK, the United Kingdom remaining in the single market (EEA model) would be the best option because the United Kingdom would continue to be bound by European labour law as well as social and environmental protection rules, and these important areas could not simply be deregulated. This concerns, for example, the participation rights of workers' representatives in companies. The Working Time Directive, as well as socio-political progress that has been achieved in many other areas in the last decades, such as the Part-time Work Directive, the Transfer of Undertakings Directive ("TUPE"), the Fixed-term Work Directive, and the Insolvency Protection Directive, would be maintained in the single market. Outside the single market there is a danger that standards will be lowered. A high level of protection in the United Kingdom is not only in the interest of British workers but is also of key importance for EU workers in terms of competitive pressure.

**The BAK is in favour of close future cooperation between the EU and the United Kingdom.** It should cover many areas, with particular attention to trade and economic relations. The European Parliament, in its motion for a resolution of 14 March 2018<sup>6</sup>, recommends an association agreement with four pillars of cooperation: 1.) Trade and economic relations, 2.) Internal security, 3.) Cooperation in foreign and defence policy; and 4.) Thematic cooperation (for example, research and innovation projects). These pillars are also largely reflected in the Guidelines of the European Council on the framework for future relations of 23 March 2018.<sup>7</sup> The BAK demands that trade in goods and services be designed in such a way that **workers' and consumers' rights, as well as environmental and climate protection,**

**are safeguarded.** The approach taken in existing EU free trade agreements would not be appropriate because it does not protect these rights sufficiently.

## 6. Demands of the BAK

With regard to **future economic and trade relations** between the EU and the United Kingdom, the BAK demands: that a future agreement must ...

- ... contain **binding provisions protecting workers, consumers and the environment.** The United Kingdom must be required to continue to apply EU standards to avoid unfair competition. Existing rights must be protected by a **non-regression clause.**
- ... create a **level playing field** for both contracting parties. Robust guarantees in terms of competition and state aid as well as tax, social, environmental and regulatory measures and practices are needed.
- ... with regard to **market access for services**, stipulate that the **rules** of the state in which the service is provided are to be complied with (**host country**).
- ... **ensure the financial stability of the EU.** The UK needs to continue to apply **EU standards** in regulating and supervising the financial market when seeking access to the European Single Market for financial services.

Due to the international importance of the City of London as a financial centre, financial services play an essential role in the Brexit negotiations. The EU has introduced a "passporting system"

for banks and financial service providers. Companies with an EU-passport that are authorised in one EU Member State may conduct their business with minimal additional approval requirements in all other Member States. For UK banks and financial service providers it will not be possible in the future to obtain "passporting" rights. Companies based in a third country may conduct their business on the basis of an EU equivalence decision. As a result of the economic and financial crisis, the EU introduced an EU-wide financial supervision system from 2008, which British companies will no longer be subject to in the future. If the UK were to severely deregulate the financial sector in the future, equivalency decisions would be ruled out.

- ... with regard to the **temporary residence of workers** in connection with the **provision of services**, specify that the **terms and conditions of employment of the host Member State** are to be respected. The future agreement must include provisions against wage and social dumping, cross-border cooperation between authorities, and administrative penalties in case of non-compliance.
- ... contain **effective enforcement mechanisms** for workers' and consumers' rights enshrined in the future agreement and provide for **effective sanction mechanisms** in case of infringement.

EU law is directly applicable and takes precedence over national law. In contrast, international treaties are not directly applicable in most states. Citizens have no opportunity to make claims based on an agreement and take legal action. Examples include the tooth-

less sustainability chapters in EU trade agreements (CETA, EU-South Korea). For the future agreement between the EU and the UK, such a model would not be sufficient in terms of the enforcement of the provisions protecting workers, consumers and the environment enshrined in the agreement.

- **Privileges for investors** and investor-state arbitration are to be **rejected**.

From the point of view of the BAK, the future agreement should not contain any special provisions for the protection of foreign investors. Both the EU and the UK are equipped with a legal system in which the right to property is adequately secured. Therefore no special provisions are required. In the event of dispute, investors in both the EU and UK have access to a fair trial under state jurisdiction. The BAK rejects a special investment arbitration court.

- From the point of view of the BAK, future **cooperation** between the EU and the UK should **not only include business and trade**. It requires, inter alia, agreements on the movement of persons, the coordination of social security, and the recognition of professional qualifications, as well as a regulation on air transport and other modes of transport.

The EU should also address issues in the negotiations with the UK that are not regulated by EU law: The BAK demands the **ending of tax exemption in the British Overseas Territories** as well as of any tax dumping policy. The United Kingdom should also remain a contracting party to the **European Convention on Human Rights and the European Social Charter**.

## Footnotes

<sup>1</sup> <https://www.tuc.org.uk/news/uk-workers-experienced-sharpest-wage-fall-any-leading-economy-tuc-analysis-finds>

<sup>2</sup> <https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/internationalmigration/bulletins/migrationstatisticsquarterlyreport/dec2016> (figure 2)

<sup>3</sup> <https://www.ons.gov.uk/employmentandlabourmarket/peopleinwork/employmentandemployeetypes/bulletins/uklabourmarket/dec2016> (figure 11)

<sup>4</sup> <https://www.tuc.org.uk/sites/default/files/Workers%20rights%20from%20Europe%20the%20impact%20of%20Brexit%20-%20Michael%20Ford%20QC.pdf>

<sup>5</sup> [https://ec.europa.eu/commission/publications/draft-agreement-withdrawal-uk-great-britain-and-northern-ireland-european-union-and-european-atomic-energy-community-0\\_de](https://ec.europa.eu/commission/publications/draft-agreement-withdrawal-uk-great-britain-and-northern-ireland-european-union-and-european-atomic-energy-community-0_de)

<sup>6</sup> <http://www.europarl.europa.eu/sides/getDoc.do?pubRef=-//EP//TEXT+TA+P8-TA-2018-0069+0+DOC+XML+V0//EN>

<sup>7</sup> <https://www.consilium.europa.eu/media/33458/23-euco-art50-guidelines.pdf>

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