



Mike Hedges MS  
Chair – Legislation, Justice and Constitution Committee

13 October 2025

Dear Mike,

In July, the Deputy First Minister and Minister for Climate Change and Rural Affairs issued a Written Statement and wrote to you regarding the UK Government's review of the UK Internal Market Act 2020 ('the Act'). Further to that letter, I am writing to confirm the Welsh Government's approach to legislation in Wales in light of the outcome of the review.

As you will be aware, the Welsh Government has been consistent in its opposition to the Act as introduced by the previous UK Government. In the context of our concerns on the Act, and it having been rejected by the Senedd, we made a Programme for Government commitment to "*challenge the UK Internal Market Act and its attack on devolution and champion the rights of the Senedd to legislate without interference in areas devolved to Wales*".

It remains our view that the Act should be repealed and replaced with a system, underpinned by legislation, which is designed around the Common Frameworks, and which maintains the safeguards necessary to support the Windsor Framework. While the UK Government has ruled out this approach, they have agreed to a new approach which aims to move the Act into the background and Common Frameworks to the foreground.

The outcome of the UK Government's recent review of the Act has therefore partially addressed our calls for a system built around Common Frameworks, rather than relying solely on the blunt tool of the Act. As such, it is a welcome step in the right direction. In particular, the UK Government has made commitments to change how the Act operates, as well as to implement all exclusions agreed through the Common Frameworks. Preventing the Act from undermining the integrity of the Common Frameworks would mitigate its threat to devolved policy objectives. As a priority, we are therefore working closely with the UK Government and other devolved governments to turn those commitments into objective and proportionate mechanisms and thereby seek to secure tangible beneficial changes to the practical operation of the Act in the context of devolution.

Canolfan Cyswllt Cyntaf / First Point of Contact Centre:  
0300 0604400

Bae Caerdydd • Cardiff Bay  
Caerdydd • Cardiff  
CF99 1SN

[Gohebiaeth.Cwnsler.Cyffredinol@llyw.cymru](mailto:Gohebiaeth.Cwnsler.Cyffredinol@llyw.cymru)  
[correspondence.Counsel.General@gov.wales](mailto:correspondence.Counsel.General@gov.wales)

Rydym yn croesawu derbyn gohebiaeth yn Gymraeg. Byddwn yn ateb gohebiaeth a dderbynnir yn Gymraeg yn Gymraeg ac ni fydd gohebu yn Gymraeg yn arwain at oedi.

We welcome receiving correspondence in Welsh. Any correspondence received in Welsh will be answered in Welsh and corresponding in Welsh will not lead to a delay in responding.

We have always accepted that the Act will apply in full to any subordinate legislation made by the Welsh Ministers under powers conferred by Acts of the UK Parliament or retained EU law. In seeking to challenge the Act, however, a legal argument was put forward that the Act did not apply to primary legislation passed by the Senedd, or to subordinate legislation made by the Welsh Ministers in reliance on powers conferred via Senedd Acts. As your Committee will know, certain legal proceedings have taken place, but that underlying legal argument has not been definitively tested in court.

In light of the UK Government's review of the Act and its commitments to enact decisions made in Common Frameworks, our immediate priority is to work collaboratively with the UK Government and the other devolved governments as outlined above. This means that when developing all relevant legislative proposals – including in the context of primary legislation in the Senedd, or subordinate legislation made by the Welsh Ministers in reliance on powers conferred via Senedd Acts – engagement will take place on a four nations basis through the relevant Common Frameworks to explore interoperability and whether any exclusions from requirements of the Act are necessary. We expect this to be the principal mechanism to discuss and secure agreements for exclusions, based on the commonly agreed principles for Common Frameworks and an objective and proportionate set of criteria.

As outlined previously, we will continue to make the case for more fundamental legislative reform of the Act. In the near term, however, the outcome of the review of the Act offers an important opportunity to demonstrate how Common Frameworks can work effectively to support the functioning of the UK Internal Market and to work with the grain of devolution. In this context, I hope that this letter is useful in confirming the Welsh Government's approach and the focus of our work.

Yours sincerely,



**Julie James AS/MS**

Y Cwnsler Cyffredinol a'r Gweinidog Cyflawni  
Counsel General and Minister for Delivery