



Brexit update

1st March 2018

UK Weighing Federation

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EU –Notice to stakeholders

Notice to stakeholders : Withdrawal of the United Kingdom and EU rules in the field of industrial products- 10th January 2018

Economic operators are advised to take the necessary steps to ensure that, where the applicable conformity assessment procedures require the intervention of a Notified Body, they will hold certificates issued by an EU-27 Notified Body to demonstrate compliance for their products placed on the market as from the withdrawal date.

Where economic operators hold certificates issued by a UK Notified Body prior to the withdrawal date and plan to continue placing the product concerned on the EU-27 market as from the withdrawal date, they are advised to consider either applying for a new certificate issued by an EU-27 Notified Body or arranging for a transfer



EU –Notice to stakeholders

Worse case situation:

The module B (type examination certificates) issued by the NMO will need to be transitioned to an EU27 notified body by March 29th 2019 if it is to be continued to used in the EU.

Module D (self-verification certificates) issued by the NMO will need to be transitioned to an EU27 notified body from **March 29th 2018** if it is continued to be used in the EU.

Major concern will be operation in the Republic of Ireland

MAY have 24 months longer **IF** there is a transition period and the EU decide to continue to accept these approval from a UK notified body for the period of the transition



EU (Module B) Type Approvals for use in the EU

- Likely that we will need to have these re-issued by an EU27 notified body
- Talking to Force (Delta) and the NMI
- Gauge if they can complete the work in time ?
- What testing would they need to do ?
- How much would they charge ?
- Visiting NMI and Force to investigate
- These organisations also offer module D
- Hope to offer UKWF members a “preferred supplier”



EU (Module B) Type Approvals for use in the UK

- Likely that we will need to have these re-issued as UK S12 approvals to use in the UK in the long term
- Worst case: March 29th 2019
- IF there is a transition period may be longer
- Must know expected cost ? (early discussions indicate a wide gap between the NMO and the UKWF)
- Must know expected time schedules – may hundreds of type approvals (Not just weighing)
- This would effect all EU type approvals used in the UK and will become a broader problem for all EU businesses
- Risk- NMO are not sufficiently resourced



EU (Module B) Type Approvals for use in the UK- Transition Period

- EU Withdrawal bill put all legislation on to the UK statute
- The legislation will probably include the concept of a “designated approval” and a “designated mark” which can be defined by the UK
- Probable that a “designated approval” will include an EU type approval
- Probable that a “designated mark” will include a CE mark
- This will revert to just UK allowed marks in the medium term
- Must lobby for the “medium term” being as long as possible
- At least six years suggested
- UKWF suggested and should lobby for the period of the type approval



EU (Module D) (self-verification) for use in the EU

- Likely that we will need to have these re-issued by an EU27 notified body
- In the process of talking to the NSAI with the intention of a new notified body operating from Dublin
- Possibly hope to start around October 2018- is this soon enough?
- Risk: The certificates issued by the NMO last for one year so any certificate issued after **March 29th 2018** will not necessarily last for the full 12 months if it is to be used in the EU27
- Will effect all module D certificates issued by the NMO
- NMO will NOT be notifying their customers of this risk- **should we do this?**
- Must decide if we wish to pursue the route of the NSAI



EU (Module D) (self-verification) for use in the UK

- Separate certificate to the EU certificate
- If there is a transition- likely to be able to use the EU certificate whilst it is a “designated approval”
- This would include certificates issued by the NMO and EU27 notified bodies
- Would need to transition to a UK approval in medium term
- Problem of cost?
- Problem of resources- This will effect all weighing and measuring companies so the NMO will need to continue to audit all of the companies that want to self-verify in the UK across the globe



Re-qualification in the UK

The NAWI Regulations 2016 link a manufacturer's right to re-qualify to an approval from a UK notified body

March 29th 2019 there will not be a notified body in the UK

Hopefully the NMO will be a designated body and the cliff edge will not appear



The next steps- UK to EU

Decide which Module B Notified Body we should advise UKWF members to move to

Decide if we should move module D certificates to the NSAI

Date that UK should know if we will have a transition deal: 23rd March 2018



The next steps- Supply in the UK

Lobby MP's that the "designated marks",
"designated approvals" should be a CE mark for
as long as possible

Type approvals to last until their expiration

We are urging all UKWF Members to issue a
Letter to their MP's

