



UK WEIGHING FEDERATION

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Mr. Alok Sharma
Secretary of State
Business, Energy and Industrial Strategy
1Victoria Street
London
SW1H 0ET

3rd July 2020

Dear Mr Sharma

I am President of the United Kingdom Weighing Federation (UKWF), which is the trade association for manufacturers and suppliers of weighing equipment in the UK. We have around 70 members with over 2800 employees and an annual combined turnover of £273 million representing about 75% of the industry. More information can be found at <https://www.ukwf.org.uk/>

We supply weighing equipment to a wide range of market sectors including heavy industry, food, pharmaceutical and medicine.

I am writing to you to outline our concern regarding what is referred to as the “time limited period” during which it will be possible to place on the market or put in to service weighing instruments lawfully bearing the CE mark where they have been assessed by an EU Notified Body

A weighing instrument (along with most other weighing and measuring equipment) must have both a type examination certificate and be verified by an authorised verifier or Inspector of Weights and Measured before it can be used.

The type examination certificate is the part of the conformity assessment procedure in which a notified body examines the technical design of the instrument and verifies and attests that the technical design of the instrument meets the requirements of the legislation that apply to it. The process is a very technical and expensive and can cost up to £40,000 for a complicated automatic weighing instrument. The type examination certificate lasts for ten years after which it must be renewed. They can be amended during the lifetime of the certificate

We are very concerned that the “time limited period” will not equate to the 10 year life of the type examination certificate and it will become necessary to change from an EU27 certificate to a UK one before it expires. If manufacturers are forced to change the certificates before they expire this will be a huge cost to the industry which will bring no benefit and extra cost to end users and consumers of the instrument.

This problem is amplified when we consider that the necessity to change from EU27 type examination certificates to UK certificates will apply to all types of weighing and measuring equipment that manufacturers or importers intend to place on the market in the UK. There are **several thousand** type examination certificates in use and many more test certificates, part certificates and evaluation

certificates that supplement these type examination certificates which will need to be transferred to UK certificates. This is an onerous task when the standards that underpin the type examination certificates remain aligned with EU harmonised standards, but when the standards diverge the instruments will need to be retested in a laboratory before a UK approval certificate can be issued.

We are very concerned that there must be sufficient resources to ensure manufacturers can transition their EU27 type examination certificates to UK ones before the end of the “time limited period”. If type examinations cannot be transitioned before the end of the “time limited period” it will leave manufacturers in the problematic position of not being able to supply compliant equipment to the wide range of market sectors in which they operate.

We would encourage you to enable EU27 type examination certificates to be converted to UK certificates upon their expiration. This would prevent unnecessary extra cost and allow compliant instruments to continue to be supplied to all users of weighing and measuring instrument and enable a smooth transition to the use of UK type examination certificates

We look forward to your comments on this matter. In the meantime, please do not hesitate to contact me or my colleague Ian Turner, the Technical Officer for the UKWF at the above address on this or any other matters.

Yours sincerely



Graham Spink
President
UK Weighing Federation