



UKWF Technical Officers Review

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What we have been working on

- Brexit
- Primary Authority
- New UKWF RoHS Guidance
- Apprenticeships
- UKWF Codes of Practice
- EU Market Surveillance Regulations
- Other EU Matters
 - Printing below minimum
 - Ticket printing
 - POS systems and modular approach



Brexit

With regard to businesses exporting to the EU

- Advice has not changed - to reduce your business risk you should have a type examination certificate from the EU27
- You should have a module D approval from the EU27
- If you have both of these you can place instruments on the market in both the EU and in the UK for a time limited period



Brexit-UKCA Mark

With regard to businesses not exporting to the EU

This will include

- UK type approval - EU27 module D
- EU 27 type approval - UK module D - This will include a large number of UK businesses who act as the legal manufacturer
- UK type approval - UK Module D
- It appears that after exit day these instruments will have to be marked with a UKCA mark to show compliance with the UK Regulations
- It appears at the moment that this could be a sticker that is added to the instrument
- Need to get further clarity on where the sticker should be affixed



Brexit - UKCA Mark

With regard to businesses not exporting to the EU

- Not clear as to whether it should be over the CE mark or next to the CE mark
- Easily visible , legible and permanent-difficult if it is just a sticker - clearly problems with space
- Must be at least 5mm in height - this will make each letter 2.5mm
- There will need to be a UK Declaration of Conformity
- This will need to reflect the UK requirements and will include the references to the relevant UK Regulations
- This will need to reflect the relevant designated standards - which will invariably be the harmonised standards under the Directive



Brexit

UK
CAP



Brexit – Requirements as to importer

UK Businesses importing in to the UK from an EU27 Country

- These businesses would have previously been a distributor for the purposes of EU Directives
- Will now become an importer for the UK Legislation
- Will need to mark with name and address
- Will need to maintain the technical files for market surveillance



Primary Authority

- Primary Authority appears to be bedding in well
- Regular contact with the Primary Authority and meetings with Board Members
- Some steps that have improved the way we work at the moment
- Are going to continue to work on the earned autonomy project to see if compliance with our Code of Practice will bring benefits to our customers
- Have met so far with a combination of resistance from some Trading Standards Officers and lack of interest from OPS&S - rather pre-occupied with other matters



Primary Authority

We will be seeking formal Primary Authority advice on

- When are instruments placed on the market ?
- Advice regarding the application of the UKCA mark after exit day
- Advice regarding the re-application of CE marks and supplementary metrology marks after they have become removed due to” fair-wear and tear”

Primary Authority will hopefully be able to issue advice on this that will be effective across the country



New UKWF RoHSII Guidance

- The UKWF Guidance on the RoHS has been updated
- Would like to use this opportunity to remind members of their obligations
- After 22nd July 2017 all new instruments must comply with the ROHS II
- Exemption for large scale fixed installations
- Cables and spare parts used for the repair, reuse, updating of its functionalities or upgrading of capacity must comply with the RoHS II at the time they are placed on the market (i.e the time they are used)



New UKWF RoHSII Guidance

- RoHS 3 (2015/863) increases the range of restricted substances for industrial monitoring and control instruments
- Will not have effect until 22nd July 2021
- We may have greater clarity by then



Apprenticeships

- We have been slowly progressing on the idea of a UKWF apprenticeship
- This has been done with the support of NPL
- There have been a number of interviews with UKWF members to canvass their views
- Planning to have a “workshop” with UKWF members to decide what the content and structure of an apprenticeship should be



Apprenticeships

- Outstanding problems
- Must produce a sufficiently robust business proposition that the Board of the NPL will fund it
- There is no funding structure in place for small businesses as yet (Government pre-occupied)
- It will not apply to Scotland, Wales and Northern Ireland
- Will have to be repeated for these countries



Apprenticeships

- Potential proposed structure
- The majority of the course will be traditional “ on the job” training
- A certain number of defined blocks will be taken at the local college
- These will be such things as Maths, English, and other agreed subjects
- There will be a block release element



UKWF Code of Practice

- We are updating the most recent Code of Practice
- This will include the requirements for ISO 9000-2015 membership
- Hoping to get this completed before the autumn
- If you have any changes you would like to see please let me know



UKWF Code of Practice

- There will be a new Code on Automatic Weighing
- There will be extra requirements with regard to the internal calibration of weights by the business
- Will be asking for members to contribute ideas to this new code



EU Changes

- New set of EU Regulations will come on the EU statute book
- Aimed at improving the effectiveness of EU Market Surveillance
- Most important part is that there must be an economic operator in the EU who is responsible for EU legislation
- For companies that export directly to the end user this will be an extra obligation
- Should be thinking of this now



Other EU developments

- The requirement to allow printing below minimum for instruments for direct sales to the public
- This will hopefully be incorporated in the next WG2
- The discussion of whether retail scales should need to print receipts has been raised again
- CECIP are reviewing the EPOS Guidance which is becoming too complicated
- Looking for a guiding set of principles rather than a piecemeal approach

