



Technical Officers Update  
Brexit roundtable  
3rd October 2019

UK Weighing Federation

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# Discussion

- This is a chance to try and understand from colleagues from Government and the Notified Body what the implications for the future are. I would like to introduce
- Mannie Panesar who is the manager of the UK notified body and what will probably become a UK approved body
- Michael Kearney who is the representative of BEIS today



# Brexit

- The story so far...
- If there is a deal there will be a two year transition
- If there is no deal there will be an overnight change
- Other possible outcomes difficult to predict
- Our customers will demand that our products meet the requirements of the legislation in force at the date they are enacted



# Brexit

- UK manufacturers that trade **only** in the UK **and** use a UK notified body.
- Immediately after exit day - at the moment this is October 31<sup>st</sup> 2019
- Must apply a UKCA mark when initially verifying an instrument and the number of the approved body
- Must continue to apply crown marks when undertaking re-qualification



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# The application of the UKCA mark

- This will go on after a verification along with the mark of the approved body
- This must be 5mm square and visible, legible and indelible
- The M mark must immediately follow the CE mark
- Still a number of very obvious questions as to this requirement



# The application of the UKCA mark

- Where will these marks be obtained from?
- Will it be a case of applying a sticker ?
- Instruments made up of a range of modules will be imported in to the UK bearing a CE mark which shows compliance with “other relevant directives”
- The UKCA mark will then have to go adjacent to the CE mark
- Obvious question of space if an instrument does need to bear a CE mark in conjunction with a UKCA mark
- Will continue to bear the EU notified body number



# UK Declaration of Conformity

- We have been lead to believe that all EU harmonised standards and OIML Normative Documents will continue to offer a presumption of conformity
- Can the existing EU standards be listed or will there be a list of BS harmonised standards to be published before exit day ?



# Importers in to the UK

- Economic operators that were previously distributors under 2014/31 and 2014/32 will now become importers
- This will necessitate the maintenance of relevant technical files and the need to mark their name and address on the instrument
- Need to understand the level of enforcement that could be applied to this across the market place
- Important to have a level playing field for all businesses that must comply with this obligation



# “The defined time period”

- If you are using a notified body from the EU27 you can continue to place instruments on the market using that notified body until the end of the defined time period
- After that it will not be possible to use an EU notified body for either module B type approvals or module D self-verification
- Will need to have UK approvals
- This will result in a fast and rapid increase in work for the UK approved body



# “The defined time period”

- All of the instrument placed on the market with any EU27 approval
- Any manufacturer using a module D approval from an EU27.
- Will have to have one for the UK
- Need to have some idea of the defined time period
- Type approval are ten years long and we do not want to have them become invalid before their expiration



# “The defined time period”

- Will the NMO approved body have sufficient resources to absorb the new business whatever shape that may take
- This will inevitably lead to an extra cost for the industry and this must be kept to a minimum
- Will the re-issuing of the type approvals be an administrative process or will the instruments need to be reapproved
- Will there be sufficient training for NMO staff to meet this demand



# The next steps

- Once we know if there will be departure with or without a deal we can make clarify our next steps
- We have been working with members for those businesses that trade in the EU27
- We must now begin the dialogue with the UK authorities to ensure the transition is as efficient and smooth as we can make it
- Should ensure that UK and EU businesses can continue to access the UK market
- Must not have one sector working at a disadvantage to others

