



Fire Industry Association



Paul Scully
Minister for Small Business, Consumers and Labour Markets
House of Commons
London
SW1A 0AA

24th November 2020

RE: UK Product regulation change – UKCA Mark

Dear Minister,

Thank you for your response to our letter regarding the UKCA mark and proposed changes to product regulation. I am writing on behalf of the Fire Industry Association and the British Security Industry Association as we still have serious concerns on the implementation and impact of the UKCA mark on our industry.

It is good to hear that you do understand the challenges that thousands of businesses are facing with the UKCA mark which as you note have been compounded by COVID-19.

We are glad to see that the Government has proposed a Mutual Recognition Agreement as part of negotiations with EU. Although this proposal is, as you say, 'subject to ongoing discussions' and as such is not sufficient enough reassurance for thousands of businesses who work in the fire safety and security industry and play a vital part in the safety of UK citizens from residential, commercial, industrial and critical infrastructure and government institutions.

Thus far, special rules have already been made by the Government for other sectors such as medical devices which shares its main priority of saving lives with the fire industry and for the construction industry that we work hand in hand with to make all buildings across the country as safe as possible.

As a result, we request a meeting to discuss:

- Should a reciprocal agreement not be acceptable, we must insist that the specified 12 months' timeline to be extended to a minimum of 36 months to allow sufficient time for manufacturers to prepare and apply the UKCA mark.

The impact of not extending the 12-month timeline to 36 months (or more*) will cause considerable damage, through the time spent and additional costs (in the region of £20 million for re-certification alone) related to transitioning to the UKCA mark, with no added value or quality to the products – simply increased costs to companies that are fighting to stay in business.

May I also take this opportunity to emphasise that while the list of UK approved standards matches Harmonised standards listed in the EUOJ there is no technical justification to apply the UKCA mark and it is therefore logical that the transition period (for CE marked products to continue to circulate in the UK) should only come to an end when the underlying standards diverge.



Fire Industry Association



Chief Executive, Fire Industry Association

Chief Executive, BSIA

About the FIA

The largest fire protection trade association in Europe with 900+ members. For more information about the FIA please visit www.fia.uk.com

About the BSIA

The British Security Industry Association (BSIA) is the trade association for the professional security industry in the UK. For more information about the BSIA please visit www.bsia.co.uk