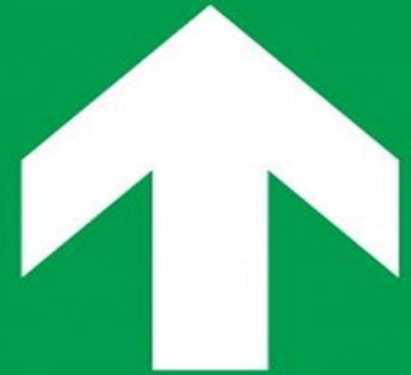


Brexit



The effects on the UK Fire Industry

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Content

Introduction to the issues, specifically: -

- The EU Construction Products Regulation (CPR)
- EU Notified Body role in CPR certification
- How the BREXIT outcome could affect the acceptance of products



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Introduction

As Britain prepares to leave the EU it has never been as important as it is today, to ensure that those involved in the manufacturing or distribution of Construction Products assess the risks to their businesses.

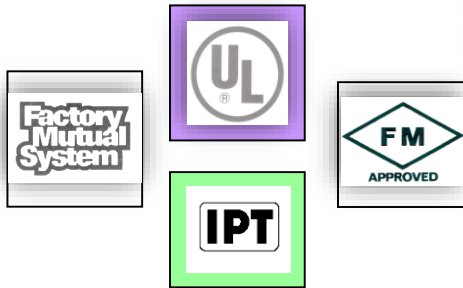
Why?

- Current EU product certification by a UK Notified Body is at risk
- Potential of recertification of construction products to a tight deadline
- High cost implications with disruption to business
- Lack of clarity in how BREXIT will affect our industry



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Fire Product Certification – Global



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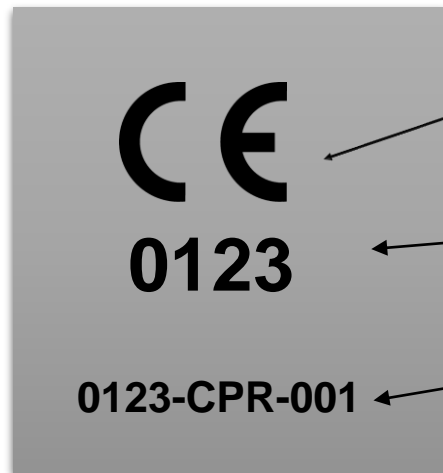
EU Construction Products Regulation (CPR)

- Construction Products Directive (CPD) was introduced in 1989
- Construction Products Regulation (CPR) replaced the CPD in 2011
- The CPR is intended to remove technical barriers to the trade of construction products in the European single market
- It places obligations on manufacturers, distributors and importers of construction products when placing them on the EU market
- CPR requires products to have CE marking with a Declaration of Performance (DoP) if it is to be placed on the market in the European Economic Area



CPR Product Marking requirements

Typical CE marking on EN54 heat and smoke detectors



CE logo

Number of the EU Notified Body

Reference of Declaration of Performance (DoP)

(i.e. number of an EU Notified Body-CPR-serial number)



This is additional to the marking required by the appropriate part of the standard
e.g. EN54-5, EN54-7



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What is an EU Notified Body?

- A Notified Body is an independent (non-governmental) third-party body, recognised by the EU/EEA
- A Notified Body is authorised to carry out conformity assessments for products that meet the requirements of a harmonised standard (hEN) or European Technical Assessment (ETA)
- The Notified Body can issue product certification, factory production control certificates and product type certification
- Currently there are 189 UK EU notified bodies, employing 4,500 people, with 20,000 customers and generating c. £2bn pa



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Brexit Outcome - No CPR Deal

Guidance from the UK Government – Manufacturers placing Fire products on the **UK** market:

1. Products that meet EU requirements can continue to be placed on the UK market providing that they have demonstrated compliance with EU requirements after exit day. This will apply for a time-limited period and sufficient notice will be given.
2. Products that meet UK requirements and bear a UK conformity marking can be placed on the UK market, as long as the third-party testing has been carried out by a UK Notified Body.

Does this mean a **new UK CPR mark** will be required?.

3. UK based notified bodies will become UK approved bodies after March the 29th 2019 and will be listed on a new UK database.



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Brexit Outcome - No CPR Deal

Guidance from the UK Government – Manufacturers placing Fire products on the **EU** market:

1. Products which were tested by a UK-based Notified Body will need to be retested and/or recertified by an EU Notified Body before placing on the EU market.
2. After March 2019 a UK based Notified Body will **no longer** be an EU Notified Body.
3. Manufacturers can arrange for their files and certificates to be transferred to an EU Notified Body.

In the scenarios above, the products and documentation would need to be re-marked with the **new** EU Notified Body four-digit number.



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Conclusions

Post-Brexit it is vitally important for UK businesses

- **149** days to go and we really do **NOT** know what BREXIT means today
- we cannot assume that the BREXIT negotiations will allow access to a UK based Notified Body, or other mutually recognised body, to provide conformity assessment required by EU legislation
- prepare in the absence of any transitional agreement, so that products can continue to be placed on the EU market
- prepare for the eventuality that conformity assessments carried out by a UK Notified Body will no longer be acceptable
- take 'Plan B' action now to prepare for business as normal in the EU

You cannot be prepared for BREXIT if you secretly believe it will not happen.



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Questions?



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