

## New UK Product regulations 2021

17<sup>th</sup> June 2020

Dear Prime Minister, Chancellor and Secretary of State,

The electrotechnical industry and its Trade Bodies BEAMA and GAMBICA are fully aware of the changes required in product regulations following the UK's departure from the EU. Over the last 4 years we have been in constant communication with Government officials on all aspects of the changing relationship with the EU. In addition, BEAMA and GAMBICA have led a pan-industry group, EURIS, working on establishing an FTA that works for mechanical and electrical equipment.

The COVID-19 pandemic has affected our industry severely, with very high reductions in business operations across the industry. Companies in the industry are thankfully seeing a slow return to pre-pandemic business levels, but it is not expected that a full return will happen this year.

As details of the Regulatory changes become clear, and the tight timescales for an immediate switchover in January 2021, significant concern has developed amongst our companies. This is exacerbated by the delay in adequate guidance from Government in how to comply to the new regulatory environment. Quite simply January 2021 is just about the worst time for these new regulations to be brought forward as business seek to recover from the impact of COVID-19. The industry is calling for a flexible approach in terms of timing, to allow markets to fully recover, and allow companies time to make the significant changes needed to be fully compliant with these new regulations. Implementation periods of between 12-18 months are needed, dependent on the size and speed of recovery, and degree of cost incurred for new regulatory compliance obligations.

Awareness of these Regulatory changes need to be disseminated through the relevant supply chains, and our industry through BEAMA and GAMBICA will do this. However, manufacturers cannot monitor the market to ensure all products placed on the market after these regulations become mandatory are compliant. It is predicted that a good proportion of products imported will be non-compliant. An enhanced market surveillance system is needed once the Regulations are mandatory.

Regulations of notable concern currently are:

- **The change of product compliance marking from the CE to UKCA** – the current advice from BEIS is this will be mandatory from the 1<sup>st</sup> January 2021. Without sufficient guidance on this available from Government our members are unable to make adequate preparations. This will come at a significant cost to business as it will affect world supply chains, in some cases require changes to moulding for products as well as package labelling. This is not feasible in under 6-months in normal situations, and impossible in the current economic and business environment.
- **REACH** – We are aware UK Government will not be negotiating some form of access to the EU REACH regulatory regime but will be introducing a UK REACH

regulatory framework very similar to that we currently follow in the EU. Again, while we have some idea of what this may look like, formal guidance from government is still not available and previous guidance for no-deal preparations has since been retracted from government and HSE websites. It is therefore impossible for our member companies to prepare.

In the current environment our members are operating in, and acknowledging the significant impact COVID 19 has had on business operations, we ask that UK Government seriously consider the impact of new regulatory requirements on UK business. Our members' priority now is getting their staff back to work and ensuring UK supply chains are running at normal capacity again. Some of the changes we have mentioned, and others we know are in the pipeline (e.g. UK Plastic Packaging Tax) will come at a significant cost and burden to manufacturing.

***We ask that UKCA marking is not made mandatory until 12-18 months after the end of the transition period, with CE marking accepted during this time as showing UK conformity, and all other significant product regulations changes given the same introductory period.***

All the companies co-signing this letter are committed to make the changes to their products and procedures, and through BEAMA and GAMBICA will continue to work with officials to ensure a smooth transition – if the suggested timescales flexibility is taken forward.

Yours sincerely

Dr Howard Porter



BEAMA CEO

Steve Brambley



GAMBICA Chief Executive

Co-Signatories:

David Hughes - CEO

ABB



Matthew Webber - Managing Director

Adey Innovation



Alan Siggins - Managing Director

Airflow



Garry Perry - Managing Director

Altecnic



Michael Bowers

Bowers Electrical



Mike Woodhall -CEO

Chameleon



Chris Burghardt - Managing Director

Chargepoint



Jon Holding- General Manager

CMD



Marcus Postings – General Manager

Danfoss UK/IE



Marc Gaunt - Manager

Eaton



Steve Bratt- CEO

ECA



Paul Taylor – Managing Director

EMLite



Andy Makin – Managing Director

Envirovent



Jon Hiscock - Managing Director

Fundamentals



Steven Rooney - Director

Gaia Climate Solutions



Patrick Caiger-Smith - CEO

GEO



Richard Shaw - Managing Director

Greenbrook



Bruce Davis - Managing Director      Hager



Patrick Testers - Managing Director      Iskraemeco



Nigel Hughes – VP N Europe      Itron



Tony Greig - CEO      Legrand



Giovanni Baccini -Managing Director      Lewden



John Griffiths - CEO      Lucy Electric



Deane Flint – Branch president      Mitsubishi



Phil Hurley - MD      Nibe



Wayne Glover - Managing Director      Nuaire



Marcello Del Brenna - CEO      Prysmian Group



Jonathan Hopkins- Director      S&C Electrical



Mike Hughes- CEO      Schneider Electric



Louis Kunzig- Managing Director      Sciaky Welding



Suket Singhal - CEO      Secure Group



Carl Ennis-CEO

Siemens



Johan Du Plessis

Tepeo



Keith Richie - Chair

Titon



Thomas Tipple – MD

Trilliant



Klaus Jesse – UK CEO

Vaillant

VAILLANT GROUP

John Foley – MD

Volution Group



Andrew Stimpson - CEO

Warmup



Paul Matthews - Managing Director

Winder Power



Tony Twohig- MD

Zehnder Group



Tracey Bamber - MD

ZIP



Graham McClean - Manager

ZIV automation



Richard Storey - Managing Director

Adam Equipment



Robert Vint - Managing Director

Alpha Laboratories Ltd



Mark Lewis - Director

Analox Limited



Huw Bevan - Managing Director	Anton Paar Ltd	
David Pennock - Chairman	Astell Scientific Ltd	
Olivier Lebreton Managing Director	BEKA associates Ltd.	
Frank Stifter – Managing Director	BioChrom Ltd	
Ben Sunderland - Managing Director	Camlab Limited	
Sean Codling - Managing Director	CTS Europe Ltd	
Jeff Clarke Deputy - Managing Director	Delta Mobrey Ltd	
Ian Smith - Group Strategic Development Director	Elemental Microanalysis Ltd	
Steve Ward - Director, Application Engineering EMEA	Emerson Automation Solutions	
Adrian Stander	Endecotts	
Chris Shelley - Managing Director	ENVEA UK Ltd	
John Paul De Beer - Managing Director	Expo Technologies Limited	

Jonathan Stanford – Managing Director

Finder



Desmond Ebenezer - Managing Director

GMC-I PROSYS Ltd



Mark Davison - CEO

Grant Instruments



Richard Jafrato - General Manager

Haier Biomedical



Phil Hadfield – UK country Director

Rockwell Automation



Matt Bryanton - Head of Business Process

HORIBA UK Limited



Graham Rogers - Managing Director

Instron Europe



Marco Koenen - Director

JSB



Edward Jukes - General Manager

KROHNE Limited



Suzanne Clubley – Managing Director

Labcold



John Lees - Managing Director

LTE Scientific



Graham Heritage - Managing Director

Megger Instruments Limited



Roger Payne - Divisional Manager

Mitsubishi Electric UK



Geoff Cheetham - General  
Manager

MOTOVARIO LTD



Adrian Ross - Operations Director

Nickel-Electro Ltd



Andrew Stephenson - Managing  
Director

Nord Gear Limited



Colin Green - General Manager

Phoenix Contact Ltd



Ian Stirling - Managing Director

Porvair Sciences  
Limited



Paul Dale - Technical Director

Powell UK Ltd



Mark Radley - Managing Director

Radleys



Peter Rank - Managing Director

Rank Brothers

**RANK BROTHERS LTD.**

Andrew Upton - Managing  
Director

Seaward Electronic



Trevor Sands

Servomex Group



Brian Holliday - Managing  
Director

Siemens Digital  
Industries



David Smith - Managing Director

Specac



Mark Brereton - Managing  
Director

Spectronic  
CamSpec



Denise Fane de salis - Managing  
Director

STARLAB (UK), Ltd





Ken Maclachlan  
UK Country Commercial Leader

ThermoFisher  
Scientific



Ian Clarke - Owner

Velocumen



Patrick O'Neill - Managing  
Director

WEG UK Ltd



Simon Goodwin - Managing  
Director

Weidmuller Ltd



Mike Wickham - Managing  
Director

Woodley  
Equipment  
Company Ltd



Carl Ramsden - Managing  
Director

Yokogawa United  
Kingdom Limited



Jenny O'Connell - Zone Director  
UK & Ireland

Eppendorf UK  
Limited



Tony Collins - Managing Director

Priorclave Ltd

