



Fire Industry Association



James Brokenshire MP  
Minister of State for Security  
House of Commons, London  
SW1A 0AA

3<sup>rd</sup> September 2020

**RE: UK Product regulation change – UKCA Mark**

Dear Minister,

We are writing on behalf of the Fire Industry Association (FIA) and the British Security Industry Association (BSIA) regarding the proposed product regulation changes and the new UKCA mark, set to be implemented on 1<sup>st</sup> January 2021. Members of both Trade Associations have serious concerns about the proposed implementation of the mark and the major impact it will have on both our respective industry organisations.

The current implementation of the UKCA is estimated to cost our industry sectors in the region of £20m for product re-certification plus an estimated timeline of over 36 months to realistically carry out the process. These headline figures do not include for the costs associated for companies that have already transferred their certification to an EU Notified Body (at considerable cost), that will need to re-apply for a UKCA mark, in addition to the ongoing maintenance costs associated with duplication of certification in terms of audits, internal projects, product modifications and file maintenance.

The combined fire and security markets account for around £3 Billion and play a vital part in the safety and security of UK citizens from residential, commercial, industrial and critical infrastructure and government institutions.

The products manufactured, installed and maintained across these sectors are subject to insurance requirements and conformance to the Construction Products Regulations (CPR) and other current EU legislation requiring certification through Notified Bodies recognised by the EU.

The financial cost and resource time associated with re-certification can only be estimated as it is unclear what level of acceptance from both EU & UK Notified Bodies will be required. i.e. it is widely anticipated the paperwork alone will not be sufficient to register a new mark, and that the certification process will indeed require a level of product re-testing in part or in full. Additionally, companies will have to re-label products and product literature resulting in a significant increase in cost.

Dual product certification will cause major disruption to companies that make/sell products across the UK, EU and global markets, which, subject to any unknown divergence, will add significant costs to the process. This process does not add any value or quality to the product, just a means of national compliance.

The outbreak of COVID-19 from March this year has had a huge impact on our industry sectors over the last 6 months and this is likely to remain the case for many months to come. Many staff are still on furlough and companies are either making staff redundant or considering redundancies to allow them to continue to trade through these uncertain times. Again, the UKCA mark requirement adds no value/quality to companies desperately trying to keep their companies in business.



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Given the lack of clarity on Government detail behind the UKCA, and noting the recent release of updated guidance on the GOV.UK web site as of 1<sup>st</sup> September, the new timelines do not provide sufficient time or detail on the implementation of the UKCA mark.

In conclusion our respective trade associations request the following:

- A reciprocal agreement to accept the EU CPR certification alongside the UKCA mark
  - 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
- Agreement that the UKCA Notified Bodies will accept the product test reports from other EU Notified Bodies without the need to retest or certify
- Consider that the requirement for the UKCA mark is not relevant for existing fire and security systems and components needed to extend, maintain and service them. Consequently, manufacturers who decide that the UKCA mark is not a viable business decision, could leave sites such as hospitals, schools, etc, with fire and security systems unsupported and unserviceable.

As Minister with responsibility for fire and security industries, we would urge you to reconsider the detail and timelines to implement the UKCA mark to limit the further damage on UK businesses and we would welcome the opportunity to arrange a roundtable meeting between yourself, your officials, the FIA and the BSIA to discuss the matter in further detail and agree a pragmatic solution to this critical issue.

Yours sincerely,

Chief Executive FIA

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](http://www.fia.uk.com)

**About the BSIA**

The trade association for the professional security industry in the UK. For more information about BSIA please visit <https://www.bsia.co.uk/>