GETTING IRELAND BREXIT READY

Rialtas na hÉireann
Government of Ireland
Presentations

- Personal Protective Equipment (Satra)
- Electromagnetic Compatibility and Radio Equipment (Compliance Engineering Ireland)
- Supports for businesses impacted by Brexit (InterTradeIreland)
- Manufacturing Products, Construction and Green Procurement (NSAI)
Current PPE industry situation

- EU published PPE regulation (EU) 2016/425 on 31 March 2016
- Replaced PPE directive 89/686/EEC on 21 April 2018
- 21 April 2019 ends the transition period
- European Notified Bodies accredited against PPE Regulation (14 in the UK)
- PPE suppliers currently recertifying products
SATRA’s Certification Services

- SATRA opened SATRA Technology Europe Ltd in Bracetown, Dublin
- Certification scope all PPE including; footwear, gloves, fall arrest products, acoustic etc.
- On 21st May 2018 appointed by the government of the Republic of Ireland as a Notified Body for Personal Protective Equipment (PPE) Regulation (EU) 2016/425
- Issued Notified Body Number 2777
- Holders of existing certificates can now choose to transfer them to the Irish Notified Body
- New applications are processed through SATRA Technology Europe Limited.
SATRA’s PPE Testing Services

• UK’s decision to withdraw from the EU will not affect the validity of existing or future test reports issued from SATRA in the UK
• Test reports will be accepted for certification purposes by SATRA Technology Europe Limited and other PPE Notified Bodies
• Accredited to ISO/IEC 17025:2017 – ‘General requirements for the competence of testing and calibration laboratories’
• SATRA’s continued involvement with CEN standardization committee
Geoff Graham
Product Certification Manager
SATRA Technology Europe Limited
(Notified body number 2777)
Geoff.Graham@satra.com
Compliance Engineering

Notified Body
EMC
Radio Equipment Directive

Paul Reilly
CE Marking and European Harmonization

- The European Union (EU) developed CE marking to harmonize product safety and marking and health concerns in order to promote trade within the EU.
- Before CE marking, manufacturers had to comply with multiple, and often inconsistent, national product compliance systems.
- The days of the telecoms compliance engineer having to travel to every EU member State are long gone!!
- In the past each country used to have its own separate approvals, but with the CE mark, it provides companies with the chance to distribute their product freely throughout the EU.
The EU Commission Stance

- Majority of non medical electrical/electronic goods do not need a Notified Body TEC so those UK manufacturers should experience minimum impact of Brexit (from a regulatory point of view)

- In some product areas, the EU legislation requires the intervention of a qualified third party, known as Notified Body, in the conformity assessment procedure.
Therefore, from March 29th, UK Notified Bodies will lose their status as EU Notified Bodies and will be removed from the Commission's information system on notified organisations.

Economic operators are advised to take the necessary steps to ensure that, where the applicable conformity assessment procedures require the intervention of a Notified Body, they will hold certificates issued by an EU Notified Body.

As a consequence, a number of UK NBs applying to INAB HPiVS - UK Notified Body for PED and RCD now based at Compliance Engineering Ireland
Following a withdrawal on the 29th March, the UK intends all current UK notified body to be granted with new UK “Approved Body” Status

Approved Bodies will be able to assess products for the UK markets to UK requirements which from the date of withdrawal will be the same as the EU essential requirements

It is proposed that a new UK conformance mark will be adopted. Rules for the affixing the UK mark will mirror that of the CE marking process
Brexit - Irish Manufacturers

- Europe – Business as usual
- Exports to UK – business as usual, for the meantime
- Future UK national mark similar to CE mark?
HPiVS’ Journey

- Registered Irish company prior to referendum
  - First in queue for accreditation by INAB
    - Completed on 5th December 2018
  - Formed an alliance with CEI
    - the only Notified Body in Ireland pre-referendum
    - CEI’s electrical + HPiVS’ mechanical skills = complete service for some machines
  - HPiVS will have capability to issue certificates for both UK & CE marks
    - Few companies with such a capability
    - It is unique for RCD!
Experience with Turkey

- To imagine a worst case scenario, we could look at Turkey
- Turkey is not in the EU, but is in the customs union.
- Over the past number of years, huge delays have been reported at Turkish border with Bulgaria.
- Along with customs documentation, relevant information, imperative to have correct declaration of conformity (DOC) in place.
- Experience from one of our client companies:
  - “……We have until Monday to present an updated CE Declaration of Conformity to the Turkish customs authorities.”
  - “……We have a shipment that has been sitting at a Turkish customs authorities warehouse for three months pending the verification.”
  - “……We are paying warehouse fees”
EU Declaration of Conformity

Product model / product:
Product Radio Product
Model/type Super 77
Serial nos. 00120 - 01000

This declaration is issued under the sole responsibility of the manufacturer.

Object of the declaration:
Product Short Range Radio

The object of the declaration described above is conformity with the relevant Union harmonisation legislation:

2014/30/EU The Electromagnetic Compatibility Directive
2011/65/EU The Restriction of Hazardous Substances Directive

References to the relevant harmonised standards used or references to the other technical specifications in relation to which conformity is declared:

- EN 300 220-2 V3.1.1 2017 Short Range Devices (SRD) operating in the frequency range 25 MHz to 1 000 MHz
- EN 301 489-1 V2.2.0 2017 ElectroMagnetic Compatibility (EMC) standard for radio equipment and services; Part 1: Common technical requirements

Signed for and on behalf of:
Conclusions

- Regulatory requirements are a major hold up at customs posts
- It is critical that manufacturers have the correct directives and standards listed on the DoC
Thank you for your attention
Paul Reilly
North South Economic Co-operation

Funded by both governments
Supporting SMEs
Focus on trade and innovation

- 36,800 companies assisted
- 7,400 companies in programmes
- 12,400 jobs created & protected
- In excess of £974m in Business Development Value
Get Brexit Ready

Raise Funding

Grow Sales

Win Tenders

Build an Innovation Culture

Business Insights
WHAT WE OFFER

- Start to Plan Vouchers
- Brexit Events
- Brexit Planning
- Brexit Research
- Brexit Glossary
- Case Studies
- Tariff Checker
- Brexit and Beyond - NEW
Practical Help

Need help with Brexit? Here you can find some amazing advice/tools to help you with the transition.

**Brexit: Start to Plan Vouchers**
InterTradeIreland offers 100% financial support up to £2,000/$2,250 (inclusive of VAT) towards professional advice in relation to Brexit matters.

**Brexit Service Providers**
Need help with legal, supply chain, trade agreements, training or finance in the post-Brexit era? View a list of Brexit service providers.

**Tariff Checker**
View, filter and print the cross-border tariffs and charges related to your business.

**Brexit Events**
Attend our focused events for Brexit topics and outcomes, where you can meet our specialist advisors and industry experts.
TOPICS TO DISCUSS

Tariff Checker

Brexit Start to Plan Voucher
How would EU tariffs affect your business?

In the event of a no-deal Brexit the tariffs that the EU have registered with the World Trade Organisation would be applied to goods being traded between the UK and the EU. It is likely the UK will register similar tariffs in the first instance for goods entering the UK.

For a quick guide to the potential tariff for your product simply enter key words in the search box below. This will automatically generate the tariffs for products that match your search term.

For a more detailed tariff information which includes further details on any restrictions, quotas or special conditions relating to your product you may contact:

The Revenue Support:

Customs Overview: www.revenue.ie/en/customs-traders-and-agents


HMRC Support:

Goods classification service: www.gov.uk/government/organisations/hm-revenue-customs/contact/tariff-classification-service

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<tr>
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<td>Charge per weight/unit</td>
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<td>25.60%</td>
<td>€ 2.50</td>
<td>100kg</td>
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<td>200899</td>
<td>Foodstuffs</td>
<td>Fruit and other edible parts of plants, prepared or preserved, whether or not containing added sugar or other sweetening matter or spirit (excl. prepared or preserved with vinegar, preserved with sugar but not laid in syrup, jams, fruit jellies, marmalades, fruit purée and pastes, obtained by cooking, and nuts, groundnuts and other seeds, pineapples, citrus fruits, pears, apricots, cherries, peaches, strawberries, palm hearts and cranberries)</td>
<td>16.00%</td>
<td>€ 2.60</td>
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<td>200909</td>
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<td>Juice of fruit or vegetables, fermented, whether or not containing added sugar or other sweetening matter (excl. containing spirit, mustards, and juice of citrus fruit, pineapples, tomatoes, grapes, incl. grape must, apples and cranberries)</td>
<td>10.50%</td>
<td>€ 12.50</td>
<td>100kg</td>
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PLANNING FOR BREXIT?
Get €2,250 towards expert advice.
Start to Plan - advice and support worth £2000/€2250

Are you a business looking to navigate your way through Brexit and are unsure what to do next? InterTradeIreland offers 100% financial support up to £2000/€2250 (inclusive of VAT) towards professional advice in relation to Brexit matters. This support can help your business get advice on specific issues such as movement of labour, goods, services and currency management.

1. Are you eligible?
   - Applications must be from an SME (250 employees or less) and Turnover < £50M (€ equivalent);
   - The business must have a satisfactory trading record (we reserve the right to request submission of Financial Accounts for the business);
   - The assistance requested must relate to a Brexit issue;
   - Companies based in Ireland must submit a valid tax clearance access number along with this application form.

Note: There are certain exclusions in line with specific State Aid guidelines, such as primary agriculture – please contact the Brexit Team at InterTradeIreland for further information.

The Voucher is provided under the European Commission Regulation on De Minimis Aid as stated in the documentation for the Brexit Start to Plan. The business must provide InterTradeIreland with details of all other De Minimis aid which has been granted to the business within the past three years. It should be noted that a false declaration by a business resulting in the threshold of €200,000 being exceeded could later give rise to the aid being recovered with interest.
<table>
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<tr>
<th>Step</th>
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<tr>
<td>Online Application *</td>
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<td>Weekly Panel Review</td>
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<tr>
<td>Terms of Reference &amp; Service Provider Engagement (2mth to complete report)</td>
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<tr>
<td>Final Report Completed by Service Provider (payment by ITI)</td>
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<tr>
<td>Survey Monkey Complete</td>
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<tr>
<td>Voucher Stats :- since launch 819 applications</td>
</tr>
<tr>
<td>Feedback positive, It is a straightforward process</td>
</tr>
</tbody>
</table>

*Similar Criteria Leo*
These case studies will inform the development of our Brexit Advisory Service that helps businesses navigate the new cross-border trading relationship as it emerges from the negotiations.
Brexit and Beyond
Brexit and Beyond: Features

As part of ongoing efforts the Brexit Advisory Service within InterTradeIreland will be launching Brexit and Beyond in February 2019 offering online learning. Brexit and Beyond will:

- Provide impartial, independent and up-to-date Brexit-related information to SMEs
- Deliver information specific to your business to help you understand the impact of Brexit challenges and opportunities it may bring and the actions you need to take now
- Allow you to be better equipped to manage the potential impact of Brexit as a result of accurate information and support
- Monitor the outworking’s of Brexit and communicate any relevant implications to businesses in both jurisdictions
- Provide practical how to videos with step-by-step details on how to fill out forms etc.
- Address an information or skills deficit.
Brexit and Beyond: Initial Courses

- Customs
- People
- Data and Services
- Supply Chain / Logistics
Brexit and Beyond: Multi-device
Brexit Support for SME’s

www.intertradeireland.com/brexit/

brexit@intertradeireland.com
Getting Ireland Ready for Brexit
Standards & Certification

FERGAL O’BYRNE
HEAD NSAI BREXIT UNIT

www.dfa.ie/brexit
www.nsai.ie
Getting Ireland Ready for Brexit

- International Standards – ISO
- Certification
- ‘CE’ Mark
- Other marks
- Importers
- Exporters
Current Irish Notified Bodies

- NSAI
- Compliance Engineering Ireland
- SATRA Technology Europe
- Industrial Pressure Testing Ltd.

Additional Irish Notified Bodies are currently being accredited for Machinery, Personal Protective Equipment, Construction Products, Transportable Pressure Equipment, Pressure Equipment, Radio Equipment, Electromagnetic Capability and Marine Equipment.
‘CE marking’ within the EU
Economic Operators’ Duties

- Manufacturer
- Importer
- Distributor
- Authorised Representative
- End User
European Single Market

Single Market
Labour
Capital
Goods and Services

Customs Union
European Single Market

Goods and Services
Purpose of the European Single Market

European standards used to level the playing field

Free trade
Third party certification
Fair trade
Impact of Brexit on Standards

• International Standards – ISO
  * Example: I.S. EN ISO 9001:2015 Quality

• European Standards - ENs
  * Examples: I.S. EN 3 Fire Extinguishers,
  * EN 14081-1 Structural Timber
Impact of Brexit on Motor Vehicles

- EU type approval- draft regulations
- UK’s automotive industry operates complex supply chains
  - highly integrated with EU MS manufacturers inc. Ireland
- Role of manufacturers' representatives post Brexit
- Supply chain implications
Impact of Brexit on ‘CE’ marking

• If you currently ‘CE’ mark your product under existing EU rules, you will be required to continue to do so post Brexit

• Post-Brexit, UK Notified Bodies will lose their status as EU Notified Bodies

• If you or one of your product suppliers rely on a British Notified Body for certification of conformity for ‘CE’ marking purposes, you will need to obtain alternatives

• While ‘CE’ marking for products may no longer be a legal requirement in the UK post Brexit, it is likely that the UK market will still require evidence of conformity of products
Impact of Brexit on importers

- If the UK is designated a “third country”, importers of UK products may be required to fulfil the legal role of “authorised representatives”

- If you’re importing products via the UK, the UK supplier can no longer act as an “authorised representative” and you will need to put into place an alternative arrangement

- The ‘Blue Guide’ on the implementation of EU products rules 2016 provides further information on the implementation of the "New Legislative Framework" for the marketing of products
Impact of Brexit on exporters

• If you or one of your product suppliers rely on a British Notified Body for certification of conformity, you will need to obtain alternatives before you can export to any EU Member State.

• For further information, please consult The ‘Blue Guide’ on the implementation of EU products rules 2016

• Post-Brexit, you may be required to provide evidence of conformity to UK national standards for products exported to the UK market
Impact of Brexit on Management Systems Certifications

It is expected that Certification to any of the International Standards Organisations Management Systems Standards below will not be directly impacted by Brexit.

- ISO 90010 Quality
- ISO 14001 Environment
- ISO 45001 Occupational Health and Safety
- ISO 13485 Medical Devices
- ISO 22000 Food Safety
## Looking for further information?

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<tr>
<th>Organisation</th>
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<td>NSAI</td>
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<td>Department of Business, Enterprise and Innovation</td>
<td><a href="https://dbei.gov.ie/en/What-We-Do/EU-Internal-Market/Brexit/">https://dbei.gov.ie/en/What-We-Do/EU-Internal-Market/Brexit/</a></td>
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Looking for further supports?

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<td>Enterprise Ireland</td>
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Thank you

WWW.NSAI.IE