



Is your business Brexit ready?

Since Ireland joined the EU Single Market, we have availed of the benefits that membership brings including the ease of trading in goods and services with our nearest neighbour- the United Kingdom (UK). The UK is scheduled to leave the EU. Post-Brexit, the UK will become a “third country” and trade in goods and service between the UK and the EU will be affected with impacts on both imported and exported goods. As the UK prepares to withdraw from the EU, we must prepare for this transition. Below you will find some useful information on the changes in trading standards that will likely take place to both products and services post-Brexit.

What are the Brexit impacts on automotive type approval?

This factsheet covers the following vehicles:

- Agriculture vehicles and their trailers
- Passenger vehicles and their trailers
- Commercial vehicles and their trailers
- Passenger cars and their trailers
- 2/3 wheel vehicles
- Motorcycles
- Non Road Mobile Machinery (NRMM)

All EU Member States recognise the activities of each other’s EU type approval authorities. These activities include the granting of EC whole vehicle type approval, assessments of conformity of production procedures and other associated activities. The type approval process ensures that motor vehicles, trailers and their systems, components and separate technical units meet the necessary technical, safety and environmental standards prior to placing on the EU market.



EU and EEA manufacturers are able to access the whole of the EU market by obtaining EU approval from any one of the national approval authorities. This ensures a level playing field for automotive products and services across the EU. Eligibility is met by tests carried out by technical services and approved by a Member State approval authority. It is not permissible for a manufacturer to hold approvals for the same type of motor vehicle from two or more separate authorities at the same time.

The European Commission has stated that when the UK leaves the European Single Market, the UK type approval authority, the Vehicle Certification Agency (VCA) will no longer be recognised as an authorised EU type-approval authority and will not be able to fulfil any of the powers and obligations of an EU type-approval authority. Consequently, manufacturers who have obtained EU approvals from the VCA will need these approvals transferred to an EU-27 issued type-approval. These include products already in production to ensure continued compliance with EU law.

Possible future regulatory alignment?

The Commission has prepared draft regulations setting out how manufacturers can transfer their UK issued type-approvals into an EU-27 issued type-approval. Once published it will be the only process available for the transfer of UK issued approvals into an EU-27 issued approval.



The European Commission have indicated that they are aware of the considerable administrative burden that the modification of the approval system will cause for manufacturers and the EU-27 Approval Authorities. Discretion will likely be provided for type-approval authorities in making their decision on whether to grant a new approval in respect of any previous UK approval.



The UK have indicated their willingness to engage constructively with their European counterparts post-Brexit including their continual participation in the UNECE World Forum for the harmonization of vehicle regulations, which underpins many of the EU regulatory standards.

What are the implications for certification/ verifications?

Post-Brexit, accreditation by British based Notified Bodies will no longer be valid for products within the EU. If you or one of your product suppliers rely on a UK Notified Body for certification of conformity to

support your product declaration for 'CE' marking purposes, you will need to obtain alternatives (EU Commission 2018).

Existing EU requirements will continue to apply in Ireland. The EU commission 'NANDO' website provides a listing of all current European wide Notified Bodies.

If you currently 'CE' mark your product under existing EU rules, you will be required to continue to do so post Brexit. 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 to existing agreed directives.

If you rely on a UK Notified Body for your product, it is recommended that you contact your respective Notified Body.

Post withdrawal, the UK will become a "third country" and manufacturers and importers currently operating from the UK will no longer be considered as being established in the EU. This could have possible impacts for supply chains and obligations being placed on economic operators. It is advised that economic operators examine their current supply chain.

Currently, manufacturers established outside the EU must appoint an authorised representative who is established in the EU. Their main function is to act as a representative of the manufacturer. As from the withdrawal date, manufacturers' representatives established in the UK will be deemed as being located outside the EU. Therefore, manufacturers established outside the EU whose representative is based in the UK, are advised to take appropriate action such as appoint a representative within the EU.

Exporting product into the UK post Brexit?

The UK's automotive industry is highly integrated with European industry and operates complex supply chains across the EU for the supply of automotive components. If you are exporting automotive parts to the UK market, it is likely that Brexit will have an impact on your supply chain.





Post-Brexit, exporters of automotive parts to the UK may have to adhere to different sets of regulations and to pay import duties. There is also the possibility of currency impacts particularly if sterling depreciates increasing the costs of exported products into the UK.

Management System Certification



It is expected that certification to any of the International Standards Organisations Management Systems Standards such as ISO 9001 Quality, ISO 14001 Environment or ISO 45001 Occupational Health and Safety will not be directly affected by Brexit. For Irish businesses under European Accreditation, the status of British based certification to international standards may in time be impacted

Looking for further information?

You can contact the NSAI Brexit Unit at BrexitUnit@NSAI.ie for any queries on standards and certifications and your business post-Brexit. The EU Commission has also produced a suite of official guidance on Brexit Preparedness for a wide range of sectors. Further information on Brexit and what it will mean to your business can also be found on the websites below.

Further Information	
NSAI	https://www.nsai.ie/about/news/is-your-business-ready-for-brexit/
Department of Business, Enterprise and Innovation	https://dbei.gov.ie/en/What-We-Do/EU-Internal-Market/Brexit/
Department of Foreign Affairs and Trade	https://www.dfa.ie/brexit/
Department of Agriculture, Food and the Marine	https://www.agriculture.gov.ie/brexit/
Department of Transport, Tourism and Sport	http://www.dttas.ie/corporate/publications/english/brexit
EU Commission NANDO website	http://ec.europa.eu/growth/tools-databases/nando/
EU Commission Information on Brexit	https://ec.europa.eu/info/brexit_en
Road Safety Authority (RSA)	http://rsa.ie/
'Blue Guide' on the implementation of EU product rules	https://ec.europa.eu/growth/content/%E2%80%98blue-guide%E2%80%99-implementation-eu-product-rules-0_en
Selling products in the EU	https://europa.eu/youreurope/business/selling-in-eu/selling-goods-services/selling-products-eu/index_en.htm
Environmental Protection Agency (EPA)	https://www.epa.ie/

