Leaving the EU: implications for UK policy makers

Written submission from **AMDEA** (Association of Manufacturers of Domestic Appliances)

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AMDEA (the Association of Manufacturers of Domestic Appliances) is the UK trade association for manufacturers of all large and small domestic appliances, from large white goods to electric showers, vacuum cleaners and hairdryers. We represent manufacturers at UK, European and International level; with government and EU political institutions; in standards and approvals; with non-governmental organisations; with consumers and in the media. AMDEA protects and promotes its members' interests in all these fields.

Introduction

The domestic appliance sector wishes to make it clear to the UK Government that it is extremely important to minimise technical and tariff barriers to trade with the EU and other parts of the world.

The world is a radically different place now compared with 1973 when the UK joined the EEC. Countries that were of minor significance for the sale of domestic appliances are now major players; the technical and other barriers to trade are now radically different; and the extent of what is technically regulated has increased significantly with a much greater emphasis on environmental protection. Manufacturing has also evolved, so that products previously manufactured in the UK from components themselves produced in the UK are now often made elsewhere from components sourced globally.

Many domestic appliances are designed and manufactured to meet world-wide requirements and the vast majority, if not all, are designed to meet EU requirements. Therefore, it is in the interests of our industry for the UK to align its technical requirements for products, post-Brexit, to be as close as possible to those applicable in the EU.

Hence AMDEA is adamant that preventing tariff and non-technical barriers to trade, with both the EU and other countries, must be at the forefront of the UK government’s priorities in their forthcoming negotiations.

The technical regulatory landscape for domestic appliances within the EU

Back in the mid-1980s it was agreed to eliminate technical barriers to trade within the EEC for a wide range of goods. This resulted in the so-called ‘New Approach’ whereby legislation

affecting the free movement of goods would contain only essential requirements, with detailed requirements being defined in standards. In this way the protection offered by the law could evolve to be 'state of the art' without constantly revising the black-letter legislation. This was then followed by the adoption of the CE marking symbol, where one symbol signified compliance with all applicable EU legislation.

We mention the above in particular to bring to people's attention that the CE marking is a sign of compliance with EU requirements – so assuming that the UK leaves the EU, does this mean that we could continue to use the CE marking because we would be a member of the EEA (as per Norway) or would the UK invent their own equivalent marking? Certainty is very important to industry, so if we are unable to signify compliance with a whole range of laws by affixing the CE marking then new UK laws will be required defining how manufacturers can signify compliance with UK domestic requirements. It is also important for consumers – are they to be offered the same level of protection as is available in the EU? Finally, it may be necessary to reinforce market surveillance to prevent the UK from becoming a dumping ground for products that do not meet EU requirements.

When the first single market measures affecting domestic appliances were initially introduced in the early 1990s the technical provisions focused on product safety and electromagnetic compatibility (EMC). But since then we have seen the introduction of many environmental protection measures, as global warming etc. has hit the public consciousness. Consequently, not only do domestic appliances need to comply with the previous legislation on product safety and EMC but there is a wide range of laws (EU Regulations and Directives) covering chemical usage (RoHS, REACH, materials in contact with food, F-gases, etc.) energy usage and other environmental attributes (Ecodesign, Energy Labelling).

The EU has a regulated system for declaring the energy efficiency of a wide range of products – the energy label with green to red scales. Like CE marking, this is an EU system with countries such as Australia and the USA having similar, but different systems. So, like CE marking, it is important for the UK to make clear if, and how, it wishes products to signify energy efficiency etc. If the UK were not able to negotiate the ability to use the EU energy labelling this could require many new UK laws to be introduced and the longer-term impact would be an increase in costs for UK consumers.

Particular implications for UK energy policy

A successful energy policy needs to be concerned with both supply and demand. As a body representing the domestic appliance sector we feel that it is essential to point out the advances made by our sector in increasing the energy efficiency of our products, and thereby the reduction in energy demand. These reductions have been made possible by technology advances encouraged by EU legislation as mentioned above. Post Brexit, it is essential that the UK does not relax its focus on energy usage but instead remains consistent with such provisions being adopted in the EU.

The UK, as with many other Member States, has been looking at reducing energy usage by enabling the provision to consumers of smart meters. Much of the standardisation activity essential to smart meter roll out has been, and is still being, undertaken at EU level, in part to support EU Directives. In order to maximise the possibilities for matching supply and demand it is necessary to facilitate direct communication between products using energy and those that supply it, e.g. enabling smart appliances to communicate directly with electrical suppliers without the need for human intervention (but with the consumer able to over-ride this where desired). Unfortunately, the UK roll-out of so-called smart meters has not required that degree of communication to be incorporated in the meter. Nevertheless, our sector continues to develop appliances having the capability to communicate with the electricity network while providing the flexibility of operation demanded by our customers.