

ARE UK SET BUILDERS MISSING THE MARK?

Gary Wilde, BPMA Technical Services Officer, believes that M&E consultants should be doing more for the safeguarding of the industry under CE, or the soon to be introduced UKCA, Marking requirements.

At the time of writing, it is unclear when the recently announced UKCA Marking, set to replace CE Marking for goods placed on the UK market, will come into effect. However, with the UK Government confirming that the rules for UKCA Marking will essentially mirror those for CE Marking, one requirement is unlikely to change – the need for any piece of machinery brought to market to carry the appropriate mark, even if all the component pieces of that machine have been assessed independently.

This means that any mechanical and electrical (M&E) consultants or end users specifying pumping equipment such as water booster sets, pressurisation, rainwater harvesting, heating systems, sewage tanks or any other bespoke units, should ensure that the complete set is CE, or in time UKCA, marked.

However, it seems that a significant number of UK set builders believe it is acceptable to bring together components from different suppliers and rely on the CE Marking placed on the individual items as compliance for their packaged set. My research has led me to believe that only a few set builders currently comply with the requirement to CE mark the packaged set.

CE Marking of a packaged set is a legal requirement, and consultants who fail to comply are breaking the law, putting themselves at risk of prosecution, hefty fines and possibly even imprisonment. They are also putting the final user at risk of breaching health and safety rules.

The British Pump Manufacturers Association (BPMA) is keen to ensure that all assembled equipment sets, especially those with pumps incorporated, are put into service correctly.

Original pump manufacturers incur tremendous costs to correctly implement the required legislative programmes so that the products they bring to market meet all appropriate certifications. The BPMA and its members are therefore calling on all consultants, M&E contractors, design and build specialists, distributors and installers to work together to use and install only CE marked equipment.

Many people are not aware that if assemblers, suppliers and installers market other manufacturers' products under their brand names,

they take over the original manufacturer's responsibilities, and they will be assuming the legal responsibility and CE marking obligations of the products they build.

A complete set needs to have its own identification label affixed with an appropriate CE mark and will need to comply with the legislation which applies to it. The label needs to carry a minimum amount of information along with contact details for the set builder and details of where the packaged set was manufactured.

Each assembled set will need to be supplied with a full and comprehensive instruction manual. The set will also need to be supplied with a Declaration of Conformity (DoC) referencing the appropriate legislation and EN standards where applicable. Most importantly, the set assembler will need to prepare a technical file that will include risk evaluation, product data, product features, production methodology and health & safety considerations.

So, what should you do if you come across a product in the supply chain that is not CE marked? You can ask your supplier at any time for full details of the CE Marking of their products. If they cannot give you these details, then you should contact Trading Standards.

Packaged pump set builders must play their part when placing products onto the UK market to comply with the law. It, therefore, makes sense only to specify, purchase and install CE marked, or when relevant, UKCA marked equipment. ➔



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