

From: Andrew Chapman
Subject: EC Certificate LRQ XXX
Date: 17 June 2019 at 17:48:21 BST
To: sales@XXX

Dear Sir/Madam,

I am writing about the UK's Brexit No Deal preparedness and am currently examining medical devices as an example of a New Approach (CE marked) product sector. Most recently I tried to ascertain to what extent BSI certificates have been transferred to the Netherlands ([Technical Barriers to Trade in the event of No Deal: Notified Bodies \(3/4\): Migration of BSI medical device certificates to the Netherlands \(3d\)](#)). I pointed out in an earlier post (<http://doortofreedom.uk/technical-barriers-trade-event-no-deal-notified-bodies-3-4-readiness-3a>) that Lloyds Register are in the process of establishing medical devices notified body services in the Netherlands, but have been advised that the completion date is likely to be in 2020, and have accordingly offered to help customers to transfer to an EU27 body.

I have also written two posts about the EU's current intention to make existing certificates invalid in the event of No Deal, arguing that both existing Commission guidance on Notified Bodies ([Technical Barriers to Trade in the event of No Deal: Notified Bodies \(3/4\): Is the Commission being consistent? \(3b\)](#)) and current specific medical device arrangements for a grace period to allow transfer of certificates from one Notified Body to another ([Technical Barriers to Trade in the event of No Deal: Notified Bodies \(3/4\): Current 'grace period' arrangements for medical devices \(3c\)](#)), suggest that it might be more consistent for them to allow products to continue to be marketed in the EU, under appropriate safeguards, while a transfer took place. This could allow a manufacturer like yourself to stay with Lloyds while their approval process in the Netherlands is completed.

This is just to say that I appreciate the difficulty that manufacturers with LRQA certificates may find themselves in. I have conducted a simple online search (EC + Certificate + Notified + Body + 0088 + 93/42/EEC) for manufacturers with Lloyds Register MDD EC Certificates, and found your certificate LRQ XXX. I would like to ask, if you don't mind, what approach you are taking to try to ensure continued market access in the event of No Deal on 31 October this year?

Yours sincerely,

Andrew Chapman