



Ask the Experts: a summary of questions asked and key point to remember

by

Philip LeShirley

Senior Trading Standards Specialist

Buckinghamshire and Surrey Trading Standards



Questions Asked

Outcomes/signposting

How do I find a testing house?

Visit United Kingdom Accreditations Service (UKAS) website. They are the UK national body responsible for assessing and accrediting organisations that provide testing, inspections, calibration services:

<https://www.ukas.com/find-an-organisation>

How do I find out about recalls of a product?

<https://www.gov.uk/product-safety-alerts-reports-recalls>

UK Importer Address Requirement labels of toys - safety-critical issue or administrative non-compliance? What level of checks are marketplaces legally required to perform for 3rd party seller product listings what counts as reasonable steps?

<https://www.businesscompanion.info/en/quick-guides/product-safety/toys>

<https://www.businesscompanion.info/en/quick-guides/product-safety/product-safety-due-diligence>

There are couple recalls of mirrors due to wall hanging adhesive may fail over time last two year. The confusing part is that the adhesion is pass loading test but still need to be recalled because "may result in failure over time". Does this mean that we can't use adhesive to fix mirror in furniture? This is a bit difficult for product designs if there is no standard here as most fixture would fail over time. Say if there is white list of adhesive that could be used?

Products must be safe for the duration of their expected lifespan. Where components such as adhesives are used, specific advice from test houses should be sought

Following a 2024 recall, OPSS scrutinised where design-risk comments in our PLM product approval system were viewed as insufficient. What does CTSI consider a proportionate but adequate pre-market risk assessment system for a high-street retailer under the General Product Safety Regulations 2005. Must every SKU have its own documented risk assessment, or can businesses comply through a structured risk-based framework with clear triggers for deeper assessment, and what records would you expect to see to evidence due diligence if that approach were challenged by OPSS or Trading Standards?

All products must be assessed individually for safety. Advice from local or primary authority should be sought.

I started originally selling Christmas tree decorations, but they are appealing to children what must I ensure I do to keep compliant?

Seek Specific advice form your local Trading Standards. Ensure that you have a sewn in tab and Permanent label sewn in. "THIS IS A DECORATION, NOT A TOY. KEEP OUT OF THE REACH OF CHILDREN AT ALL TIMES"

<https://www.rospa.com/home-safety/product-safety/christmas-novelties>

<https://onthewight.com/beware-of-novelty-items-that-look-like-toys-say-trading-standards/#:~:text=I...>

<https://www.tradingstandards.uk/consumer-help>

Do sellers in the UK need to undertake Digital Passports?

CTSI were recommended by a previous attendee a you tube video on this subject are:

https://youtu.be/AApDiVD_Lgg?si=50ksvQfPsr5bYEDE

I bought some suntan lotion, and the label is in Russan, what can I do to ensure it complies before I sell it?

If you are selling products in GB then these products must comply with GB legislation.

<https://www.businesscompanion.info/en/quick-guides/product-safety/cosmetic-products>



What are the most common issues that trading standards find when looking at products? And therefore, businesses must be mindful of?

Many businesses importing products from outside of GB are unaware that they are 'placing the product on the market' in GB (even though they are not the manufacturer).

I am about to start selling small toys what should I consider with the products I buy?

Ensure the products have CE / UKCA marks, age warnings and other labelling requirements. Where these are missing, then follow up with the retailer and further up the chain.

Selling goods supplied to you from within GB

- The seller to YOU is responsible for the product's safety unless you “own brand it” or add to it
- You should seek assurances from them that the product is safe (test reports etc)
- You should not sell products you are unsure about
- You must assist with any product recalls & keep records
- Notify supplier & trading standards of any issues

Selling goods supplied to you from outside GB

- YOU are responsible for the product's safety
- You are "placing the product on the market" in GB
- You should have tests carried out or ensure that tests have been carried out elsewhere that satisfy you & maintain technical file
- You must label the product correctly
- You must carry out product recalls & keep records & notify trading standards of any issues

Northern Ireland

For most products, the move from NI to GB is smooth, but you must ensure compliance with *GB* regulations when placing them on the GB market.

You may wish you seek specific advice on this point and about selling products into NI.

Selling goods you have manufactured

- YOU are responsible for the product's safety
- You are "placing the product on the market" in GB
- You should have tests carried out to ensure safety
- You must maintain the technical file
- You must label the product correctly
- You must carry out product recalls & keep records
- You must notify trading standards of any issues

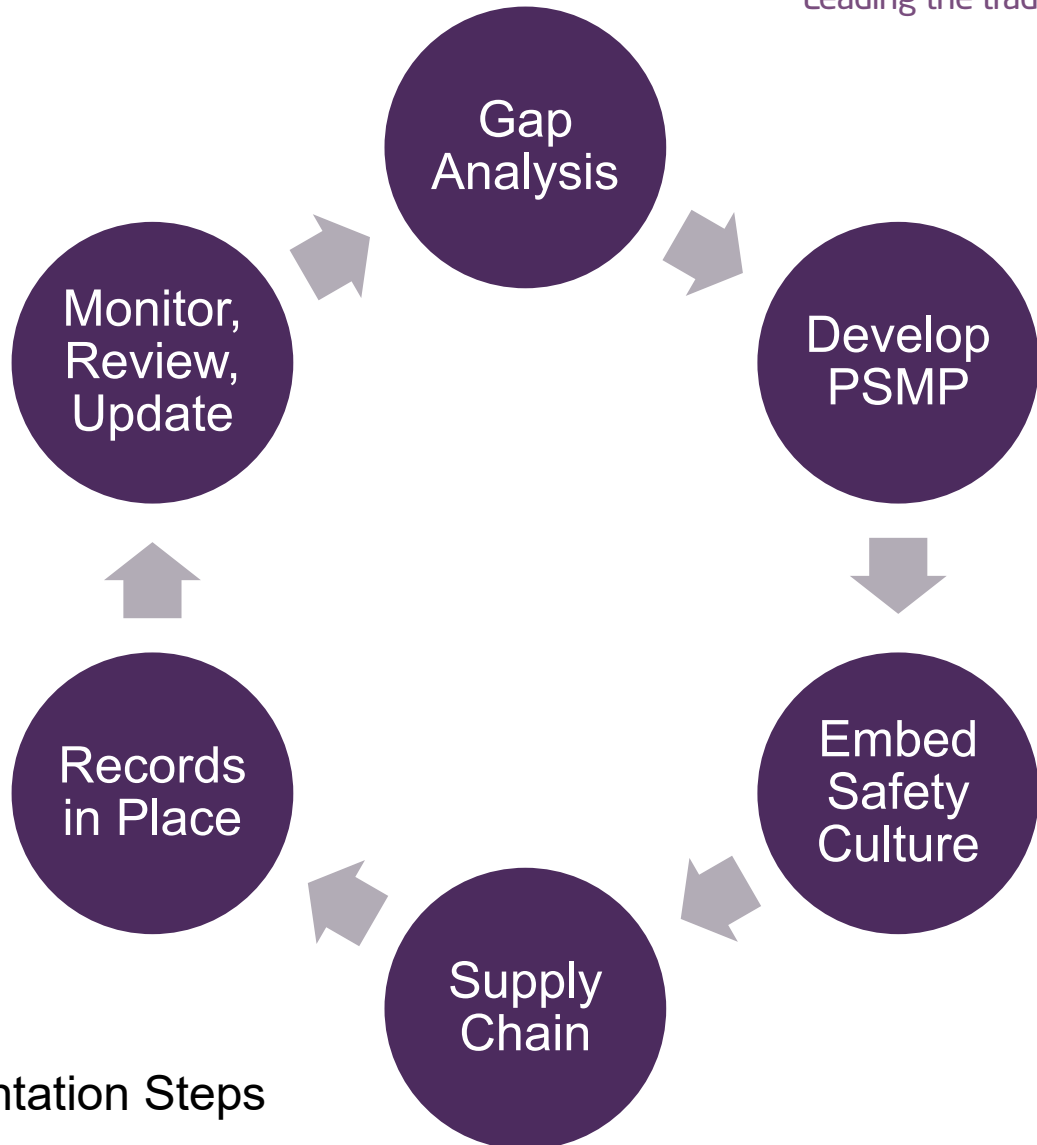
The Keys to Understanding

- The higher in the chain you are, the more you need to do.
- Everyone in the chain has to do **SOMETHING**
- Doing nothing is never an option

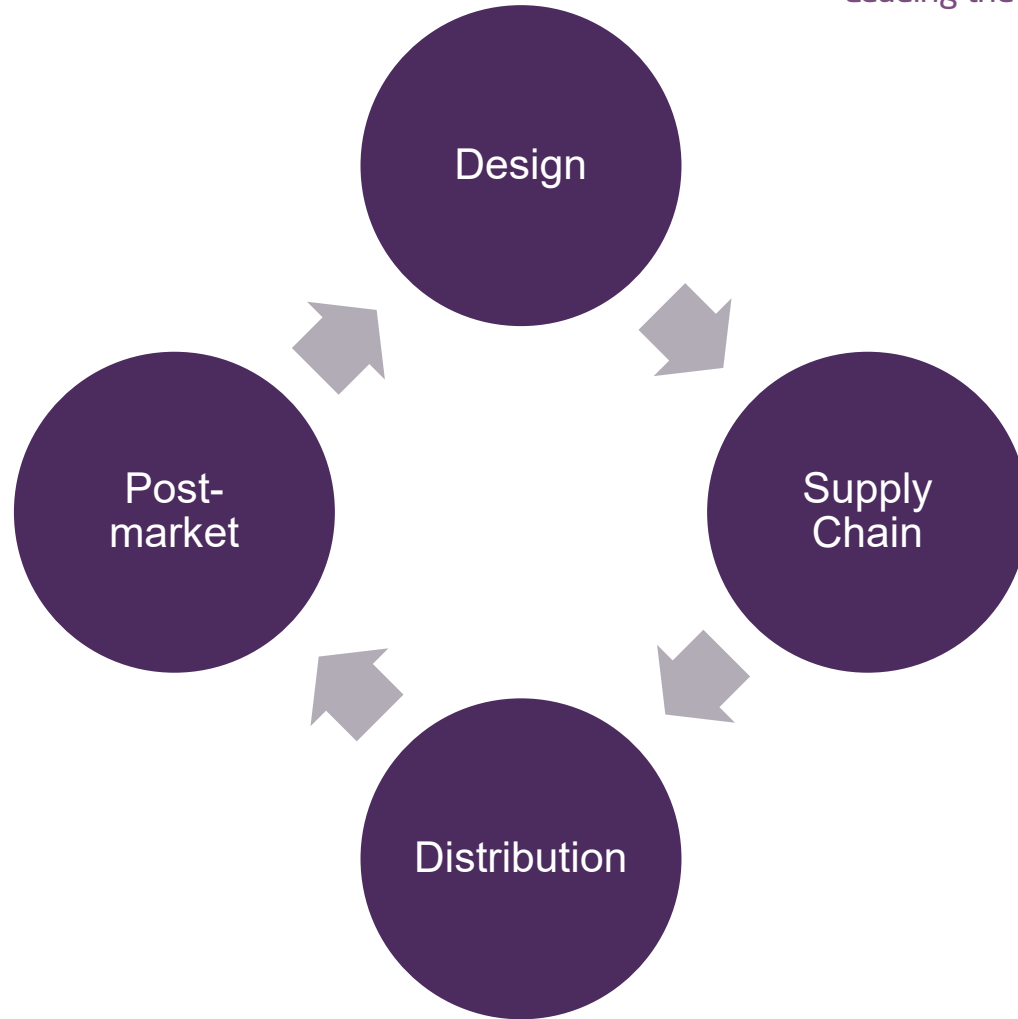


Product Regulation and Metrology Act 2025

- Consultation stage – enabling legislation
- Digital labelling + AI
- Review of GPSR
- Civil penalties
- Chemicals period products
- Batteries (button + coin)
- Product liability
- **Greater controls on online marketplaces**
 - **Implications for online sellers**



PAS 7050 Implementation Steps

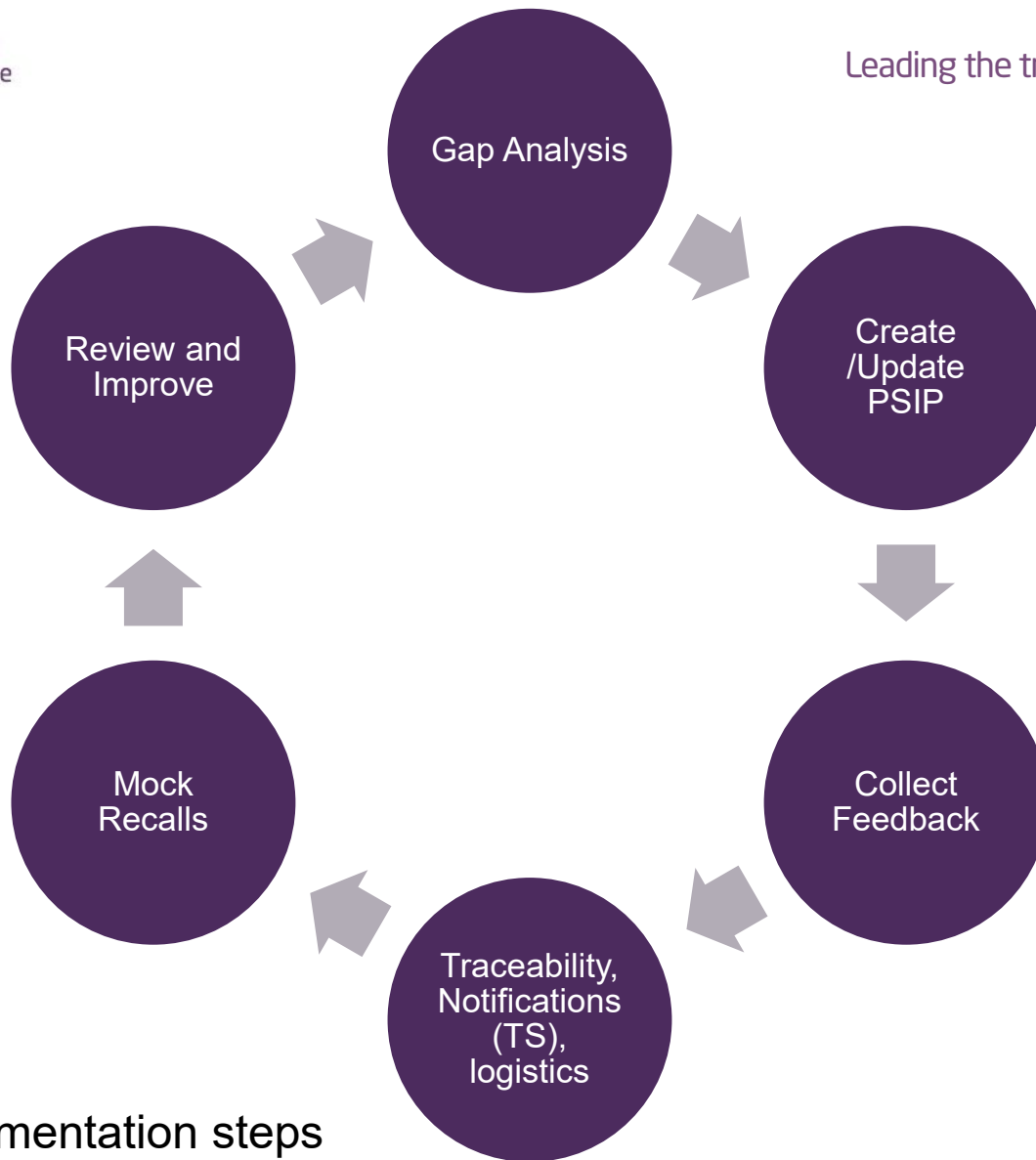


PAS 7050 Holistic Approach



Chartered Trading Standards Institute

Leading the trading standards profession

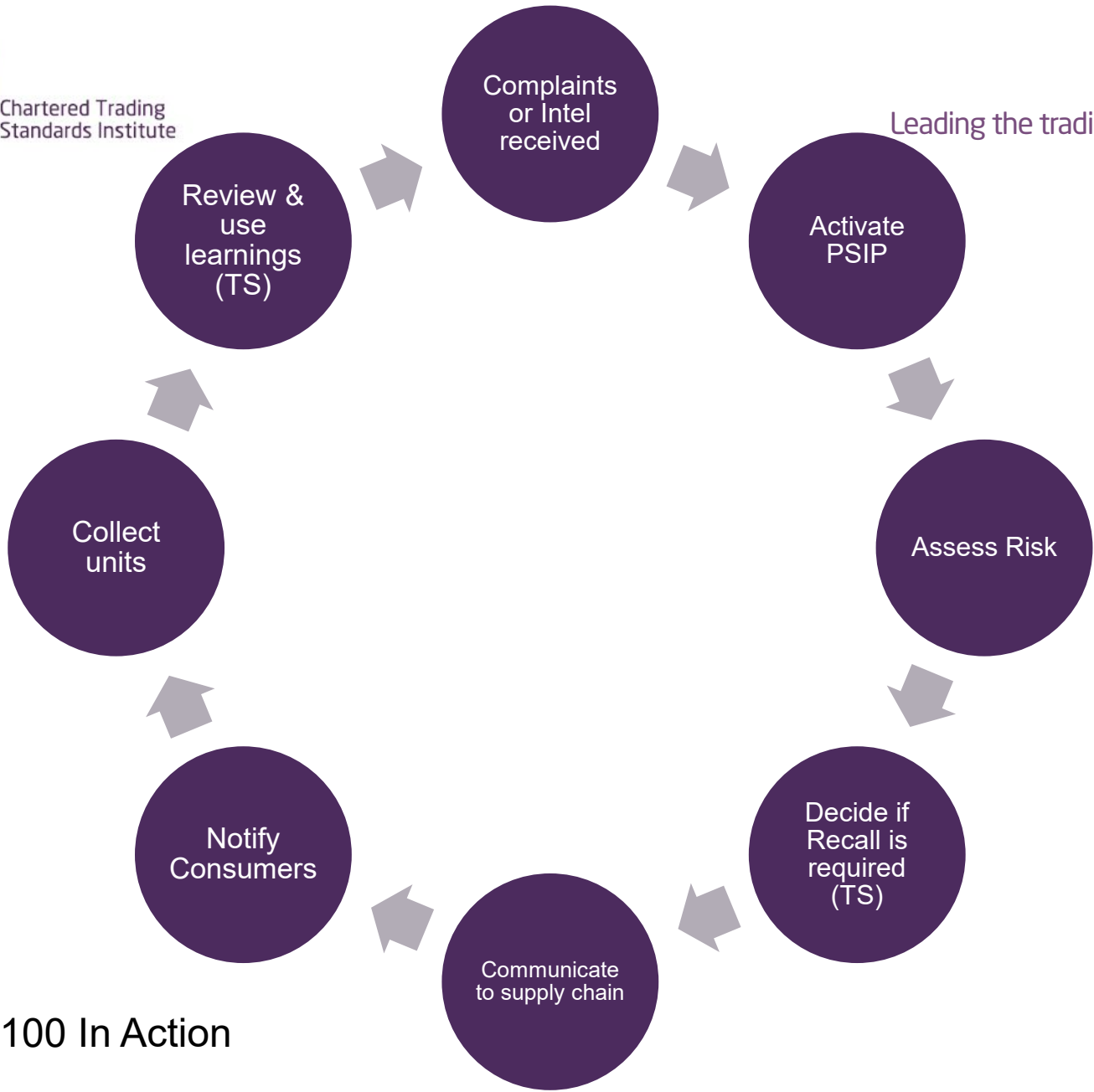


PAS 7100 Implementation steps



Chartered Trading Standards Institute

Leading the trading standards profession



PAS 7100 In Action