



Department for
Business & Trade



Office for Product
Safety & Standards

Consultation on the UK's new product safety framework:

Response form

Summary

We are seeking views on a new, modernised and enhanced core product safety framework.

Please return to: ProductSafetyReform@businessandtrade.gov.uk

Closing: 23.59 on 23 June

Introduction

The existing product safety framework needs an upgrade. It is based on the General Product Safety Regulations 2005, introduced two decades ago, and overlaid with specific regulations for certain product sectors. We live in a world vastly different from the turn of the century, and the way people buy products has evolved. There are simply too many instances of dangerous products being sold to UK consumers, often online, resulting in serious harm.

The need for a new core framework was identified by the [Product Safety Review](#) and endorsed by Parliament in passing the Product Regulation and Metrology Act 2025. In this consultation we propose a new, modernised and enhanced framework giving people confidence that what they buy will be safe, thereby supporting growth and giving businesses incentives to invest by providing a level playing field, with clearer responsibilities and a more consistent and streamlined set of regulations.

Our proposals are grouped into the following themes:

1. Getting the basics right
2. Accountability throughout the supply chain
3. A new approach to product information
4. Supporting enforcement activity

The new core product safety framework will:

- require proactive action from everyone in the supply chain to protect consumers;
- reflect modern products and supply chains;
- capitalise on the opportunities new technology has provided for both businesses and consumers; and
- support delivery of the government's [Regulation Action Plan](#).

This consultation should be read together with its companion consultation on the market surveillance and enforcement aspects of the new framework. The proposals and questions in this document are in the format 'A1, A2' and in the other document are in the format 'B1, B2' Please ensure your answers reference the proposal and questions numbers with the correct letter and number.

[Read and respond to the consultation on market surveillance and enforcement.](#)

Confidentiality and data protection

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Your Details	
1. Your name	Siobhan Toland
2. Your email address	tolands@belfastcity.gov.uk
3. Are you responding:	
As an individual? Please go to 'Consultation Questions'	
On behalf of an organisation? Please continue	X
4. Name of organisation	Belfast City Council
5. Number of employees	
1 to 9	
10 to 49	
50 to 249	
250 or more	X
6. Type of organisation	
Business	
Trade Association	
Test House or Laboratory	
Consumer Body	
Local Authority	X
Fire and Rescue Service	
Government Body	
Other (Please specify)	

Consultation Questions			
Getting the basics right			
Question A1: Do you agree or disagree with the proposed scope of the regulations, including the exemptions from scope?			
Agree	<input type="checkbox"/>	Neither agree nor disagree	<input checked="" type="checkbox"/>
Disagree	<input type="checkbox"/>	Don't know	<input type="checkbox"/>
Please explain your answer			
<p>We would highlight that products intended for business or workplace use are already subject to enforcement under existing directives for which HSENI is the competent authority, for example the Machinery Safety Directive.</p> <p>While we recognise that the framework seeks to address identified gaps in product safety enforcement, there must be clear guidance and explicit consideration of HSENI's enforcement role in relation to business products.</p> <p>Without clear statutory boundaries or joint guidance between OPSS, local authorities and HSENI, there is a risk of inconsistent enforcement and duplication, particularly for products that may be used both by consumers and within the workplace.</p>			
Question A2: Do you agree or disagree with the proposed definition of a safe product?			
Agree	<input type="checkbox"/>	Neither agree nor disagree	<input checked="" type="checkbox"/>
Disagree	<input type="checkbox"/>	Don't know	<input type="checkbox"/>
Please explain your answer			
<p>The extension of the scope to include maintenance requirements introduces additional variables that may affect whether the product considered safe. This will require suppliers to provide clear, reasonable instructions for maintenance supported by enforceable regulations.</p> <p>The proposed definition creates divergence with the definitions used in 2023/988 General Product Safety Regulation, which may create difficulties for NI businesses and District Councils operating within a dual regulatory framework. In this context, detailed and consistent guidance will be essential to support enforcement.</p> <p>The inclusion of additional risks to property, domestic animals or the environment will allow more appropriate standards in relation to these products to be applied and enforced.</p>			
Question A3: Do you agree or disagree with the new list of considerations when assessing safety?			
Agree	<input checked="" type="checkbox"/>	Neither agree nor disagree	<input type="checkbox"/>
Disagree	<input type="checkbox"/>	Don't know	<input type="checkbox"/>
Please explain your answer			

Agree as it broadly mirrors the considerations for assessing safety in 2023/988 General Product Safety Regulation.			
Question A4: Do you agree or disagree with our proposal to revoke the Food Imitations (Safety) Regulations 1989?			
Agree	X	Neither agree nor disagree	
Disagree		Don't know	
Please explain your answer			
EU has repealed the equivalent EU law for food imitating products, so revoking these regulations will also ensure a consistent position across the UK.			
Question A5: Do you agree or disagree that essential safety requirements, testing or conformity assessment may be useful in the new framework?			
Agree	X	Neither agree nor disagree	
Disagree		Don't know	
Please explain your answer			
<p>Agree in principle there needs to be clear guidance, and consideration should be given to mirroring the approach set out in 2023/988 GPSR to avoid divergence.</p> <p>The unique situation of NI which requires alignment with both UK and EU markets and legislative requirements, must be fully taken into consideration as this is key to enforcement, the achievement of business compliance and avoiding any potential divergence issues.</p>			
Question A6: Do you agree or disagree with introducing the 'designation' mechanism for products covered by the framework?			
Agree	X	Neither agree nor disagree	
Disagree		Don't know	
Please explain your answer			
The unique position of NI requiring alignment with both EU and UK markets and legislative requirements need to be taken into consideration as this is key to enforcement, the achievement of business compliance and avoiding potential divergence issues.			
Question A7: In what circumstances, if any, might it be appropriate to designate a standard from a competent standards body other than BSI, European standards bodies, or international standards bodies?			
<p>It may be appropriate to designate a standard from another competent standards body only where there is a clear, objective justification, such as:</p> <ul style="list-style-type: none"> • Absence of suitable recognised standards • Sector-specific expertise not reflected in BS/EN/ISO standards 			

- Urgent or emerging risks
- Legal or international requirements
- Demonstrable equivalence or superiority

Such designations should be exceptional, transparent, proportionate, and avoid unnecessary barriers to compliance or competition.

Question A8: Are there any further actions you believe we should be taking to ensure lithium-ion batteries within consumer products are safe?

Overall, the aim should be to ensure lithium-ion batteries remain safe throughout their entire life cycle, not merely at the point of manufacture or sale.

This should include controls relating to replacement batteries, compatibility of chargers, and risks arising from repair, refurbishment and second-hand sales.

Accountability throughout the supply chain

Question A9: Do you agree or disagree with the requirement that producers must only place safe products on the market?

Agree	X	Neither agree nor disagree	
Disagree		Don't know	

Please explain your answer

Links should be made to the definitions set out in 2023/988 GPSR to ensure consistency and avoid any divergence issues. There needs to be a more responsive attitude to the market and guidance for the different types of markets and their obligations.

In 2023/988 GPSR the definition of “Producer” has been changed to “manufacturer” causing the roles of an economic operator to be defined differently in GPSR 2005 2023/988 GPSR thus causing divergence issues within Northern Ireland.

Question A10: Do you agree or disagree with the requirement that onward suppliers should act with due care and not supply a product unless it is compliant?

Agree	X	Neither agree nor disagree	
Disagree		Don't know	

Please explain your answer

Links should be made with 2023/988 GPSR definitions to ensure consistency and avoid any divergence issues. There needs to be a more responsive attitude to the market and guidance for the different types of markets and their obligations.

Question A11: Do you agree or disagree that online marketplaces should be required to act with due care to prevent, identify and remove non-compliant products from their sites?

Agree	X	Neither agree nor disagree	
Disagree		Don't know	

Please explain your answer

From previous experience, sites remove a single product on request however do not follow up with same product being sold by multiple other suppliers. We agree in principle that online marketplaces should be required to identify and remove all non-compliant product from their sites, however this needs to be supported by clear guidance and adequate enforcement powers provided to MS authorities.

From an Environmental Health and product safety enforcement perspective, we support the proposed requirement that onward suppliers must act with due care and should not supply a product unless it is compliant.

The proposal appropriately reflects that product safety is a shared responsibility across the supply chain, rather than resting solely with producers. To ensure the requirement can be implemented effectively and consistently, it will be important that:

- Clear and practical guidance is published illustrating what “due care” means for different types of onward supplier
- Guidance is aligned with enforcement practice and supported by appropriate training where necessary
- Expectations are clearly communicated to small and medium-sized enterprises

Question A12: Do you agree or disagree with the introduction of a requirement that online marketplaces should practice due diligence to identify and take action against non-compliant sellers and sellers that provide non-compliant goods?

Agree	X	Neither agree nor disagree	
Disagree		Don't know	

Please explain your answer

This will help promote consistency across enforcing authorities and provide businesses with greater confidence in how to meet their obligations.

From enforcement experience, non-compliant or dangerous products are frequently encountered at the retail, wholesale or fulfilment stage, including cases where producers are based overseas or are difficult to identify or engage. Introducing a clear duty on onward suppliers to remain alert to product safety alerts, recalls and known hazards; maintain proportionate checks and internal procedures and refrain from supplying products where compliance is uncertain would enable earlier intervention before harm occurs, reduce reliance on reactive enforcement once products have reached consumers, and improve the effectiveness of corrective actions such as product withdrawals and recalls.

This approach is particularly important in the context of e commerce and fulfilment-based supply models, where onward suppliers may represent the only UK based economic operator with meaningful control over products entering the market.

As officers we do not have the tools to trace, trace and take enforcement action against rogue online sellers / carry out online forensic investigation.

The proposed requirement for online marketplaces to verify seller contact details is essential, particularly in NI where Councils are experiencing an increase in businesses registering in vacant premises or addresses with multiple businesses registered to it in an attempt to hold both UK and EU registered addresses to comply with legislative requirements.

Question A13: In which situations or for which products do you think additional verification requirements or local presence requirements would be useful?

We are of the opinion that all products require additional verification and local presence requirements. If a responsible person will not be a legal requirement for all products this causes a divergence issue for NI under a number of different regulations i.e. 2023/988 GPSR and products in scope of Article 4 of the market surveillance regulation.

To differentiate between high and low risk products would require a risk assessment for each product type and cause further confusion for consumers and business.

Question A14: Do you agree or disagree that we should give all supply chain actors a duty to participate in monitoring of products already supplied and to cooperate in corrective action?

Agree	X	Neither agree nor disagree	
Disagree		Don't know	

Please explain your answer

Agree as this places an onus on businesses to notify MS authorities and take corrective action in line with 2023/988 GPSR requirements.

Question A15: Do you agree that all supply chain actors should have a duty to cooperate with relevant authorities and others in the supply chain?

Agree	X	Neither agree nor disagree	
Disagree		Don't know	

Please explain your answer

Effective cooperation is fundamental to protecting consumers and other users from unsafe products. In practice, enforcement action is often delayed or undermined by difficulties obtaining timely, accurate or complete information from businesses within the supply chain. A clear, consistent duty to cooperate would help address these issues and support more effective and proportionate enforcement.

Question A16: Do you agree or disagree with the proposal for online marketplaces and producers to have a single point of contact?

Agree	X	Neither agree nor disagree	
Disagree		Don't know	

Please explain your answer

This is beneficial however there needs to be an onus on businesses to update contact details, understand the responsibilities associated with this role and for MS authorities to have adequate enforcement powers.

We consider the proposal especially important for online marketplaces, given their central role in modern supply chains and the volume and speed at which products are made available to consumers. Clear and reliable contact arrangements would support more effective cooperation, particularly where rapid action is required to mitigate risk.

Overall, a requirement for a single point of contact would be a practical and proportionate measure that strengthens communication between businesses and relevant authorities and supports a more effective product safety framework.

A new approach to product information

Question A17: Do you agree or disagree with the proposal for information that must be provided on or with the product?

Agree	X	Neither agree nor disagree	
Disagree		Don't know	

Please explain your answer

Should this progress, the information needs to be provided in a consistent format, that is easy for the consumer to read and understand. This information must also contain, in a standard consistent format, information for MS authorities to suitably assess compliance.

The proposed information requirements reflect the core purposes of product information, namely:

- Enabling products to be used and handled safely
- Supporting traceability and accountability within the supply chain
- Allowing enforcement authorities to identify responsible economic operators and take timely action where risks arise.

However, the acceptance of digital labelling again will cause divergence for NI businesses and MS authorities who will be required to continue with printed information.

Question A18: Do you agree or disagree with the proposed types of information that can be provided digitally?

Agree		Neither agree nor disagree	X
Disagree		Don't know	

Please explain your answer

We are of the opinion that the proposed information including safety warnings should remain present on the product or its packaging so it is clearly visible, and can easily be seen on purchase, particularly by vulnerable consumers on purchase.

Question A19: What, if any, protections would be necessary to ensure that consumers with limited digital access or low digital confidence online are not disadvantaged?

From an Environmental Health perspective, consumer protection frameworks must remain inclusive and proportionate. While digital labelling can improve efficiency and access to information, it is essential that critical product information remains accessible to all consumers.

A combined approach is therefore necessary to ensure that no consumer is placed at increased risk due to limited digital access or low confidence.

Question A20: Are there any further actions you believe we should take beyond the existing and proposed requirements to ensure period products are safe?			
We agree with the introduction of safety standards, and as MS authorities rely on the provision of standards to inform enforcement decisions and support consistent enforcement action.			
Question A21: Do you agree or disagree with the proposed information that producers and onward suppliers selling products online should provide on an online listing?			
Agree	X	Neither agree nor disagree	
Disagree		Don't know	
Please explain your answer			
We agree, however, this may present practical challenges in relation to the identification of businesses, access to closed or private online platforms (including those requiring registration), and the effective enforcement of such legislative requirements.			
Question A22: Do you agree or disagree that online marketplaces should be required to design their interface to allow sellers to provide customer information?			
Agree	X	Neither agree nor disagree	
Disagree		Don't know	
Please explain your answer			
Agree however this will present difficulties in the identification of businesses, accessing closed sites and the enforcement of such legislation. The measures must be supported by robust enforcement powers and appropriate penalties to ensure compliance.			
Question A23: Should online marketplaces introduce additional steps, such as verifying certain product information or making some information mandatory, before listings are published?			
Yes	X	No	Not sure
Please explain your answer			
Online marketplaces should have a verified presence in the UK or Northern Ireland, including a confirmed name, physical address and (where applicable) a Companies House registration, with an identifiable person responsible for product safety, essential to enable effective enforcement. Such businesses should also be able to verify key product safety information and making specified details mandatory before listings go live. Requiring information such as producer or importer details, compliance declarations, traceability information, and relevant safety warnings at the point of listing would help prevent unsafe or non-compliant products entering the market, particularly via third-party sellers and overseas suppliers.			

Building on the new foundations				
Question A24: Do any of the provisions in existing sector regulations fit these categories?				
Yes	X	No		Not sure
If you responded 'Yes', please provide details of the provisions and your reasons. If you consider that any of the additional tools in proposals A5 or A9 may be helpful for the relevant products, you may include this in your response.				
<p>We would suggest that a review of children's nightwear and children's dress up costumes should fall under the new framework with product specific standards.</p> <p>Inclusion of food packaging which might cause physical harm and is not included under the Materials and Articles in Contact with Food Regulations – i.e. sharp bottle tops / cans which District Councils have received complaints of following injury however no specific guidance / standard exists.</p> <p>Motor vehicle tyres and the pedal bicycles regulation could be incorporated with an additional standard.</p> <p>Jewellery products are considered under REACH however additional requirements under GPSR would assist enforcement.</p>				
Question A25: Are you aware of any data or evidence on the types of AI-enabled products that are likely to be manufactured in the future?				
Yes		No	X	Not sure
If you responded 'Yes', please detail the data or evidence you are aware of.				
Belfast City Council has no experience enforcing AI-enabled products are therefore unable to respond to this question.				
Question A26: What do you think are the current or potential harms associated with AI-enabled products?				
Belfast City Council has no experience enforcing AI-enabled products are therefore unable to respond to this question.				

Question A27: How can we ensure that the reformed product safety framework effectively addresses the unique challenges posed by AI-enabled products and digital innovations, while supporting innovation?

When responding to the question, please consider:

- Is the framework proposed in this consultation sufficient?
- Are any additional sector-specific provisions required?
- What new approaches might be needed to safeguard consumers while supporting innovation, and how could measures such as consumer information, standards, quality assurance, data governance, documentation requirements or human oversight improve the safety of AI-enabled products?

Belfast City Council has no experience enforcing AI-enabled products are therefore unable to respond to this question.

Question A28: Considering that the role of AI can adapt and evolve across a product's entire life cycle, how can regulation best account for this?

Regulation should be flexible, risk-based and take account of a product throughout its lifecycle subject to reasonable use, recognising that such products can evolve through updates and learning after being placed on the market.

Safety requirements should therefore include ongoing monitoring, clear responsibility across supply chains (including software providers and marketplaces), be proportionate, transparent to support enforcement and accountability.

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