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Consultation Response

Which? response to the OPSS' consultation on The UK's new core product regulation market surveillance and enforcement framework

Submission date: 23/06/2026

Summary

Which? welcomes this opportunity to respond to the OPSS' consultation on The UK's new core product regulation market surveillance and enforcement framework.

We strongly support the government's proposal to modernise the UK's fragmented product enforcement landscape into a single, cohesive toolkit. For too long, systemic regulatory failures and glaring loopholes, particularly within complex online supply chains, have exposed shoppers to staggering quantities of non-compliant and dangerous goods. While a unified set of powers applicable from the border to the digital storefront is a common-sense reform, a framework is only as strong as its ability to deter bad actors. To genuinely protect consumers and rebuild trust, this modernised regime must be backed by heavy penalties, strict accountability, and an empowered, independent regulator.

Closing the Online Marketplace loophole and ensuring accountability The vast regulatory gap between traditional high street retailers and online marketplaces must be closed. Which? is calling for explicit statutory duties of care for online platforms, requiring them to rigorously verify seller compliance before products are ever listed. Furthermore, any business selling into the UK must be legally mandated to appoint a UK-based representative to serve as a physical, legally actionable point of contact for safety authorities. Crucially, we strongly welcome the introduction of bespoke online interface orders. These are a vital mechanism that will provide enforcers with the explicit power to definitively block non-compliant businesses and online marketplaces from selling unsafe goods to UK consumers.

Sanctions that serve as a genuine deterrent

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For penalties to successfully alter corporate behaviour, the government must move away from rigid, pre-set fines that multinational e-commerce giants can simply treat as a cost of doing business. Which? advocates for variable monetary penalties and daily escalating sanctions calculated as a percentage of a company's global turnover. While low-friction civil penalties are appropriate for minor administrative breaches, criminal penalties and director disqualification must be retained for high-harm, systemic, or fraudulent non-compliance, such as platforms repeatedly ignoring mandatory product takedown orders.

Resourcing frontline enforcement via 'Polluter Pays'

The UK's enforcement ecosystem is under pressure and inadequately resourced with a lot of responsibility still falling to local authority Trading Standards services (TSS), Which? strongly supports a robust cost recovery framework that forces non-compliant businesses, including sellers or the online marketplaces that facilitated the sale of unsafe products to fully reimburse authorities for the substantial costs of complex investigations, laboratory testing, and safe hazardous waste disposal.

Shifting the focus to direct consumer redress

Historically, product safety enforcement has penalised rogue businesses without offering direct resolution to the affected public. The modernised regime must introduce fairer redress mechanisms, including collective actions and mandatory communication orders that compel platforms to use their proprietary customer data to contact affected buyers directly with high-visibility safety warnings. Additionally, while Which? supports enforcement undertakings where a business formally agrees to corrective action in lieu of prosecution, these must directly benefit harmed consumers through mandated compensation or replacement programmes, and they must be strictly barred for repeat offenders or severe safety breaches.

Establishing an independent statutory regulator

To turn the tide on systemic safety failures and drive wider economic growth by boosting consumer confidence, the enforcement infrastructure itself must evolve. Advanced powers like online interface orders will only reach their full potential if wielded by an empowered and autonomous body. Therefore, the government should establish the Office for Product Safety and Standards (OPSS) as a fully independent, consumer-focused statutory regulator. Free from competing departmental priorities, this independent body must be supported by legal frameworks that mandate real-time, seamless intelligence-sharing networks between national regulators, frontline Trading Standards services, Border Force, and emergency services to intercept high-risk products before they cause domestic harm.

As part of the review that DBT is undertaking into Trading Standards duties, it also needs to ensure that enforcement responsibilities, for both product safety and metrology, reflect the complexity of the business and the scale of the harm. This will require a redistribution of responsibilities for larger and more complex businesses to the OPSS in a similar way to the approach that the Food Standards Agency is adopting for larger, national businesses as part of its work on National Level Regulation. It also needs to be ensured that there is appropriate expertise within the

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system at the most appropriate level, including reviewing the role of national and regional teams rather than the current approach which relies on local authority prioritisation to ensure sufficient expertise, skills and resources exist within the system.

Full response

Question B1a: Do you agree that the UK product regulation market surveillance and enforcement legislation should be reformed to establish a single, coherent set of enforcement powers available regardless of where it might be utilised within the product journey (e.g. at the border)?

Response options:

- Strongly agree

Question B1b: Please explain your answer.

We strongly support the proposal to modernise the UK's fragmented enforcement landscape into a single, coherent toolkit. Creating a common enforcement framework and a consolidated set of powers, available at every stage of the product journey, from the border to the digital storefront is a common-sense reform. An outcomes-focused enforcement regime, supported by specific provisions and guidance where needed, has the potential to provide much-needed oversight and enable a rapid and more effective response to new risks without weakening existing and proposed protections or creating gaps that unscrupulous sellers could exploit.

However, for this single toolkit to be effective, it must have real teeth. A unified framework is only as strong as its ability to deter bad actors. We believe the following elements are non-negotiable for a successful reform:

- **Meaningful enforcement powers that include financial penalties and stronger intervention powers:** Regulators must be equipped an appropriate suite of powers to hold businesses to account, including the power to issue financial penalties that are able to serve as a genuine deterrent, especially for manufacturers, large-scale online marketplaces, retailers and other 'onward suppliers', for example fines must be significant enough to outweigh the profits made from non-compliance. This also includes appropriate intervention powers for all businesses across the supply chain.
- **UK-based accountability:** The rise of complex online supply chains has made enforcement increasingly difficult. We believe it is imperative that any business selling into the UK, particularly online marketplaces, must appoint a **UK-based legal representative**. However, this requirement must be rigorously enforced so it does not lead to the provision of merely tokenistic contacts or become a loophole for businesses to circumvent their responsibilities. While this UK representative must serve as an empowered, physical point of contact for safety authorities and a dedicated channel to facilitate consumer redress when products cause harm, we

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must be clear: the ultimate legal accountability and responsibility remain entirely with the leadership of the organisation operating the business. The representative ensures enforcement powers are practically actionable on UK soil rather than largely theoretical, but they do not absolve the parent company of its core duties.

- **Effective investigation powers:** We agree that relevant authorities must have the powers and tools to take early steps to address potential risks, including effective monitoring and surveillance as well as information gathering powers.
- **Rapid response at the border:** Strengthening powers at the border provides a critical safety net. A coherent toolkit should allow for the immediate seizure and destruction of products that fail to meet safety standards. However, because it is impossible to intercept every unsafe item upon arrival, these powers must operate alongside strong legislative requirements and enforcement penalties that incentivise and deter businesses to ensure compliance and take a preventative approach. Effective deterrence, ensuring businesses face severe consequences for attempting to supply non-compliant goods, is essential to stop these products from ever reaching UK ports and consumers homes.
- **The enforcement regime must take account of the precautionary principle**: We also agree with the proposed process for the Secretary of State to be able to implement a 'temporary precautionary measure', in circumstances where there is insufficient evidence to determine if the product is harmful. This would be an inherently sensible backstop to help ensure the safety of consumers, and would be in keeping with the outcomes-based approach.

A single set of enforcement powers is a positive step toward a safer UK market, but it must be supported by a powerful deterrent and clear lines of accountability. We must ensure this proposed modernisation leads to a more stringent safety regime where consumers are protected regardless of where or how they choose to shop.

Question B2a: Do you agree this new enforcement 'toolkit' should apply to product regulation more widely, beyond product safety? For example, should apply to measuring instruments and non-automatic weighing instruments (but not to other metrology legislation e.g. specified quantities).

Response options:

- Strongly agree

Question B2b: Please explain your answer.

Which? supports the consolidation and alignment of enforcement legislation. A fragmented regulatory regime creates confusion for businesses as well as loopholes that bad actors can easily exploit. Consumers rightly expect robust and appropriate safeguards across the entire product spectrum, ranging from the critical safety standards required for high-risk electrical appliances to the reliable accuracy expected of everyday measuring instruments.

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Applying a unified, comprehensive enforcement 'toolkit' across the broader product regulation landscape, including metrology, will allow authorities and regulators to act more promptly and proactively. Our investigations have repeatedly shown systemic regulatory failures exacerbated by the proliferation of online business models, which expose shoppers to staggering quantities of potentially non-compliant and dangerous goods. A universally applicable framework ensures a level playing field and is a necessary step toward closing the dangerous gap in protections that currently exists.

Question B3: What challenges might there be in having fewer, more flexible, consolidated, enforcement powers for product regulations?

While we agree that an agile enforcement regime is better able to adapt to changing consumer purchasing habits, consolidated powers must not create bottlenecks in communication or enforcement. For instance, if a central body such as the OPSS operates as a single point of contact for notifications of non-compliance, product recalls, or serious incidents, it is vital that this information flows directly and simultaneously to other enforcement bodies, particularly local Trading Standards services (TSS), who play an essential role in responding to enforcement interventions and executing follow-up corrective actions. The framework must also be kept under review to ensure that it continues to provide relevant authorities with the toolkit they need to deal with new and emerging risks.

Question B4: What additional reforms to existing powers would improve enforcement of metrology legislation?

Reforms to metrology and wider product legislation must account for profound changes in the retail landscape and emerging technological developments, including the security and accuracy of software, apps, and automated systems. To improve enforcement, regulators need explicit powers to tackle systemic failures driven by new e-commerce supply chains.

Crucially, reforms should introduce clear duties of care for online marketplaces, ensuring they are held to the same standards as traditional high street retailers. Additionally, we urge the inclusion of better and fairer redress mechanisms for consumers. This means introducing reforms that address the clarity of liability, shift the burden of proof where appropriate, and implement collective redress procedures for cases where non-compliant products cause widespread consumer detriment.

Question B5a: Which provisions in product regulation legislation create unnecessary administrative process? Please describe and explain any administrative burdens you are aware of.

Which? recognises that making it easier for businesses to understand safety and compliance requirements is likely to promote innovation, choice, and ultimately lead to safer products for consumers. However, severe administrative burdens currently arise from the stark regulatory inconsistencies between high-street retailers and online marketplaces. Legitimate

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businesses face unnecessary hurdles navigating a fragmented enforcement landscape, while rogue overseas sellers often evade accountability entirely. This fragmented approach inevitably slows down the removal of dangerous or non-compliant goods from the market, leaving consumers at risk.

Question B5b: Please provide what you think could be an alternative.

An effective alternative requires modernising the UK's product safety regime to make it inherently agile and fit for future challenges. We advocate for a streamlined, centralised reporting infrastructure, provided that intelligence is shared instantly and seamlessly with frontline enforcers like TSS.

Additionally, we recommend a stronger regulatory focus on prevention. By introducing clear, statutory obligations for online marketplaces, specifically, wider duty of care provisions alongside robust requirements to verify seller compliance before products are listed, we can stop unsafe goods at the source. This preventative approach will ultimately result in significantly fewer non-compliant products entering the market, which in turn will drastically reduce the downstream enforcement burden on regulatory authorities. Shifting from fragmented rules to a cohesive, risk-based system supported by modern traceability and digital solutions that remain accessible to all consumers would reduce unnecessary administrative processes while actively closing the regulatory gaps that currently fail consumers. This would also help ensure that enforcement authorities were able to identify any gaps in expertise and skills and address them sufficiently early in order to be able to more effectively respond to market developments.

Question B6: How could we simplify enforcement provisions (including for market surveillance) across the UK to establish a coherent and consistent UK-wide framework that supports effective enforcement in both Great Britain and Northern Ireland, in line with the government's Windsor Framework obligations?

Establishing a coherent and consistent UK-wide framework requires robust, real-time intelligence-sharing networks between the OPSS, TSS, and border enforcement agencies to ensure a rapid, coordinated response to emerging risks. As consumer purchasing habits evolve and e-commerce accelerates by modernising the regime and equipping authorities across all UK nations with the same agile enforcement toolkit, the government can finally turn the tide on systemic failures and ensure all UK consumers are adequately protected from harm, regardless of where they live or how they shop.

Crucially, Which? strongly welcomes the proposed provisions for a strengthened enforcement toolkit, encompassing variable financial penalties, cost recovery mechanisms, and bespoke online interface orders.

These **interface orders** are a vital mechanism, providing the explicit power to definitively stop non-compliant businesses and online marketplaces from selling unsafe goods to UK

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consumers. However, these powers will only reach their full potential if wielded by an empowered and autonomous regulator.

Trading standards reform and regulator responsibilities

More fundamentally, as part of the review that DBT is undertaking into Trading Standards duties, it needs to be ensured that enforcement responsibilities, for both product safety and metrology, reflect the complexity of the business and the scale of the harm. This will require a redistribution of responsibilities for larger and more complex businesses to the OPSS in a similar way to the approach that the Food Standards Agency is adopting for larger, national businesses as part of its work on National Level Regulation. It also needs to be ensured that there is appropriate expertise within the system at the most appropriate level, including reviewing the role of national and regional teams rather than the current approach which relies on local authority prioritisation to ensure sufficient expertise, skills and resources exist within the system. Our analysis through a comprehensive freedom of information (FOI) request (has shown that this results in a postcode lottery with many important aspects of consumer protection, including weights and measures, being deprioritised. With no national system for reporting on activity it is difficult to have a clear understanding of where enforcement activity is still able to take place. The new enforcement framework therefore has to go hand in hand with reform of the enforcement system and responsibilities within it.

An independent, consumer-focused regulator

To truly establish a coherent, UK-wide framework and rebuild public trust, it is also now time for the government to take the necessary step of establishing the OPSS as a fully independent, consumer-focused statutory regulator. Ensuring the OPSS has this clear, dedicated focus, free from competing departmental priorities, is essential not just for public protection, but as a driver for the economy. A consistent, robust enforcement framework enhances consumer confidence, which is foundational to a thriving marketplace. When consumers trust the safety of the products they buy, it stimulates market participation, increases consumer confidence and ultimately contributes directly to wider economic growth. We think that the Food Standards Agency is a model for how an independent OPSS with a clear consumer focus should be developed.

Proposal B2: Addressing the enforcement challenges of global and online supply chains

Question B7: What bespoke powers are required to enforce against online and overseas supply chain actors, in addition to the broad powers outlined under Proposal B1?

We strongly support the proposal that Online Interface Orders, similar to those set out in the Digital Markets, Competition and Consumers Act 2025 should also be available to the OPSS and relevant authorities, including Trading Standards to enforce compliance with product safety requirements. Lessons should be learned from how effectively these have been used for wider consumer protection to ensure that they can be used if necessary and so that they can act as a deterrent for businesses who know that this is ultimately an option for

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regulators. If a business is putting consumers at significant risk or repeatedly fails to comply with product safety legislation with significant consequences for safety, then there should be the ultimate threat that they can be prevented from having access to the UK market.

As a supporting model, we note the EU's incoming 2028 customs penalties for third-country e-commerce platforms. This framework introduces a mechanism for systematic non-compliance, including fines of 1% to 4% of EU import volume, escalating to 3% to 6% after six months. If the non-compliance persists, authorities can temporarily restrict access to the operator's online interface or website and take additional enforcement measures. We also agree with the suggestion to require online marketplaces to have a presence in the UK. Please see our response to question B1b above- we see this as important to enable enforcement action to be taken domestically, and believe that this would be an effective option to improve accountability.

<u>Proposal B3: Proportionate and effective penalties</u>

Question B8a: To what extent do you agree with this approach of categorising offences?

Response options:

- Strongly agree

Question B8b: Please explain your answer.

Which? agrees that categorising offences is a pragmatic approach to regulation. A modern product safety framework must distinguish between administrative oversights by legitimate businesses and the deliberate or grossly negligent facilitation of dangerous goods reaching consumers and the many aspects of non-compliance that fall in-between.

Our investigations have repeatedly exposed systemic product safety failures, This has more recently been particularly the case for online marketplaces, where shoppers are exposed to staggering quantities of potentially dangerous goods. Categorising offences allows regulators to deploy rapid, low-friction resolutions for minor technical breaches while reserving the most severe, punitive powers for high-harm and repeat offences, such as knowingly selling unsafe electronics or toys, or systemic failures by platforms to vet rogue overseas sellers.

We would argue that criminal penalties should be retained in the toolkit as well, as there will still be situations where these remain appropriate.

Question B9a: To what extent do you agree that this approach enables the application of proportionate penalties?

Response options:

- Somewhat agree

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Question B9b Please explain your answer.

While a categorised approach *enables* proportionate penalties, its success depends entirely on what the government deems proportionate. For penalties to be truly effective, they must act as a robust deterrent.

Currently, the gap between protections for products bought on online marketplaces versus traditional high street retailers is vast. If a multinational online marketplace facilitates the sale of thousands of non-compliant products due to a failure in their 'Know Your Business Customer' (KYBC) processes, a small, fixed penalty is profoundly inadequate. To be proportionate, penalties for major systemic failures must scale with the size and turnover of the business to ensure corporate behaviour is genuinely altered.

We also note that it could be argued that, within a particular category, non-compliance with some requirements could be seen as more 'serious' than others. For example, within the category of 'on-market requirements', not reporting appropriately to the relevant authorities is obviously a serious matter, but not taking corrective action where it is known that a product presents a risk is arguably even more egregious. So the available penalties should reflect these differences within categories.

Question B10a: Should enforcement undertakings be available across all product regulations?

Response options:

- Yes with reservation

Question B10b: If no, what products, regulatory obligations or types of non-compliance should be excluded and why?

Whilst we agree that enforcement undertakings (where a business formally agrees to take corrective action in lieu of prosecution) can be a useful means to achieve business compliance by looking at future business practices, we feel that this should *not* be available for the most serious safety breaches or for repeat offenders. In particular, we believe that exclusions must apply to instances involving:

1. Products that present a serious or imminent risk of death, severe injury, or fire (e.g., highly non-compliant lithium-ion batteries or unsafe electrical appliances). 2. Intentional evasion of regulatory obligations, such as overseas sellers repeatedly shutting down and reopening marketplace accounts to avoid detection. 3. Persistent failures by supply chain actors, including online marketplaces, to act on takedown notices or share intelligence with regulators. In these high-harm scenarios, immediate punitive action and product withdrawal are necessary to protect the public; a negotiated undertaking is insufficiently robust.

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Question B11a: Should we consider whether to accept undertakings that seek to benefit those affected by the non-compliance?

Response options:

- Yes

Question B11b: Please explain your answer.

Which? strongly advocates for the inclusion of better and fairer redress mechanisms for consumers. Historically, product safety enforcement has focused on the state penalising the business, leaving the harmed consumer without adequate resolution.

If an enforcement undertaking is deemed appropriate for a specific offence, it is entirely right that the undertaking includes a direct benefit to those affected. This could involve mandated compensation schemes, proactive and fully funded repair/replacement programmes, or contributions to consumer safety awareness campaigns. By ensuring undertakings directly address consumer detriment, the regime shifts toward a fairer system that actively remedies the harm caused by non-compliance.

Proposal B4: Civil monetary penalties

Question B12: Which instances of product regulation non-compliance would you consider FIXED monetary penalties a useful, proportionate and effective response?

Fixed monetary penalties are most effective for clear-cut, lower-level, or administrative breaches where the product itself does not pose an immediate danger. This includes:

- Minor metrology infractions or incorrect labelling.
- Failure to display required compliance markings (e.g., UKCA/CE marks) on otherwise safe goods.
- Delayed submission of compliance documentation to regulators. In these instances, fixed penalties provide a swift, efficient enforcement mechanism that reduces the administrative burden on Trading Standards services (TSS) while nudging legitimate businesses back into compliance.

Question B13: For which instances of product regulation non-compliance would you consider VARIABLE monetary penalties a useful, proportionate and effective response?

Variable penalties are essential for severe, systemic, or highly profitable non-compliance, where a fixed fine would be treated as negligible. Only by scaling penalties against a company's global turnover will they serve as a meaningful deterrent to multinational corporations. Which? considers variable monetary penalties a useful, proportionate, and effective response in the following instances:

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- Online marketplaces: Failing in their statutory duties, or failing to prevent suspended rogue sellers from re-entering the platform.
- Manufacturers: Systemic design or production failures, particularly where safety risks are ignored during manufacturing or where there is a failure to implement proper quality control.
- Onward suppliers: The systemic import, storage, or distribution of unsafe goods across the supply chain.
- Connected products: Widespread consumer detriment resulting from software or automated system failures in smart devices.

Question B14: In which circumstances would you consider an escalating monetary penalty system a useful, proportionate and effective response?

Escalating monetary penalties are a vital tool for driving immediate action and tackling deliberate delays. They should also help provide an effective deterrence for non-compliance and should for example be applied when:

- A platform or onward supplier fails to comply with a mandatory takedown order for a dangerous product within a specified timeframe.
- A business fails to execute a product recall or execute it appropriately and fails to directly notify consumers using the proprietary data at their disposal and take the necessary measures to reach affected consumers.
- Supply chain actors refuse to provide required traceability information or cooperate with an ongoing OPSS or TSS investigation. The threat of daily escalating fines is highly effective in focusing corporate minds and accelerating the removal of consumer risk.

Question B15a: To what extent do you agree / disagree that monetary penalties should be escalated by a pre-set amount, or by a percentage of the original penalty?

Response options:

- Somewhat agree

Question B15b: Please explain and give examples to illustrate your answer.

While we agree with the principle of escalation, a rigid pre-set amount is inherently flawed in a modern, digitised economy. A pre-set daily escalation of £1,000 might bankrupt a small independent importer but would be completely unnoticed by a global online marketplace generating billions in revenue.

To be effective, escalation must be calculated as a percentage of the company's turnover (like in the CMA new fining powers under the DMCC Act) or an appropriately scaled percentage of a variable original penalty. This ensures that the escalating pressure applies

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equally to massive e-commerce platforms and smaller high street retailers, incentivising compliance and ensuring all actors respond with the necessary urgency.

Question B16: Please list any other form of civil sanction that may be appropriate for either product safety, or broader product regulations?

To establish a cohesive framework that provides true consumer protection and redress, we recommend the following additional sanctions:

- Mandatory Communication Orders: The power to compel online marketplaces and retailers to use their customer data to directly contact consumers with highly visible, mandated safety warnings or recall notices, rather than relying on ineffective public notices.
- Collective Redress Mechanisms: Allowing consumer bodies or regulators to initiate collective civil sanctions or compensation claims on behalf of large groups of consumers who have purchased dangerous or severely non-compliant goods.
- Director Disqualification: For the most egregious or repeated safety failures, regulators should have the power to pursue the disqualification of company directors to ensure personal accountability for systemic corporate negligence.

Proposal B5: Cost recovery framework

Question B17b: Please explain and give examples to illustrate your answer.

Which? has long warned that the UK's product safety enforcement ecosystem is not fit for purpose or appropriately resourced. Implementing a robust cost recovery framework would embed the 'polluter pays' principle directly into UK product regulation. It would allow enforcement authorities to recoup the substantial costs associated with complex investigations, laboratory testing, and the safe storage and destruction of non-compliant goods, which is one of the issues that local authority TSS face when seizing goods under consumer protection legislation. For example, if a local authority has to seize and safely destroy a large consignment of highly dangerous, non-compliant lithium-ion e-bike batteries, the sheer cost of hazardous waste disposal and independent laboratory testing can severely deplete their annual enforcement budget. A cost recovery feature ensures the financial liability for these necessary interventions falls squarely on the non-compliant seller or the online marketplace that negligently facilitated the sale rather than starving vital public services of funds, including the OPSS if they move to undertaking more direct enforcement.

Proposal B6: Information sharing

Question B19a: To what extent would you agree / disagree that greater powers are needed, beyond establishing a legal framework, to facilitate sharing information

between relevant authorities, emergency services, and specified persons for product regulation, safety, and compliance?

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Response options:

- Strongly agree

Question B19b: Please explain and give examples to illustrate your answer.

Establishing a legal framework is a necessary first step, but a framework alone is insufficient if enforcement bodies lack the operational powers and practical mechanisms to demand, extract, and seamlessly share product safety intelligence. As we have set out, a more fundamental review of the enforcement system to ensure a more coherent, intelligence-led system with more appropriate allocation of responsibilities.

Our investigations continually highlight that fragmented enforcement allows dangerous goods to slip through the cracks. In a digital economy characterised by complex, cross-border supply chains, information must flow promptly. For example, if Fire and Rescue Services identify a specific brand of lithium-ion e-bike battery causing domestic fires, they must be able to share this intelligence seamlessly with the OPSS, local TSS, and Border Force. In addition, we see this as an opportunity to hold a greater role internationally, exercised by engaging in and developing robust cross border cooperation. For example through on-going proactive participation at the OECD and UNCTAD.

Question B20b: Please list which bodies or persons such information should be shared between to ensure effective market surveillance and enforcement.

To establish a coherent, UK-wide framework that supports rapid market intervention, intelligence must be seamlessly shared between:

- National Regulators: The OPSS and other relevant national regulators.
- Frontline enforcers: Local Trading Standards services and Environmental Health Officers across all four nations of the UK.
- Border Control: UK Border Force and HMRC, to intercept dangerous goods before they enter the domestic market.
- Emergency Services: Fire and Rescue Services, the NHS A&Es, and the Police.

It is also essential that the system facilitates easy and rapid intelligence sharing from businesses and from public interest groups, such as ourselves.

About Which?

Which? is the UK's consumer champion, here to make life simpler, fairer and safer for everyone. Our research gets to the heart of consumer issues, our advice is impartial, and our rigorous product tests lead to expert recommendations. We're the independent consumer voice that works with politicians and lawmakers, investigates, holds businesses

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to account and makes change happen. As an organisation we're not for profit and all for making consumers more powerful.

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