

PROVIDING GUIDANCE TO MANUFACTURERS AND USER COMMUNITIES

GUIDANCE ON CE AND CA MARKING UPDATE



CE or CA or both – what should you do?

Introduction

The transition period following BREXIT ended on December 31st 2020.

It was agreed that the UK will retain EU legislation currently in force in the UK and it will become domestic law. Should any EMC Directives change subsequently, the position is that the UK will not automatically adopt any change. In addition, the UK has adopted a number of EN standards which have been approved as UK designated standards.

With regard to CE marking – EU standards will henceforth be identified as EN ****

With regard to CA marking – UK adopted designated standards will be identified as BS EN **

UK only standards will continue to be identified as BS ***

UKCA marking will apply only in England, Scotland and Wales and not Northern Ireland.

By January 2022 CA marking **must be used** for products placed on the UK market, but this will not be recognised in the EU market and will not be accepted in NI without the additional CE Mark.

Northern Ireland will have UK or EU27 for the Northern Ireland market.

CE or CA until 31st December 2021

The UK will still accept CE marking until 31st December 2021. In addition, it will accept a combination of both CE and CA marking if this is necessary as per the table below. This is particularly relevant where manufacturers are reliant on components from the EU which require CE marking in order to be sold. A component built in the EU will at some point require to be CA marked for the UK market, but until the end of 2021 it can still be accepted into the UK with a CE mark only. This means for manufacturers using a CA mark for the final product, they will have a combination of the two.

However, you should speak with your supply chain to ascertain whether they will be arranging for CA marking for those components since you may have to source elsewhere from January 2022 for products not deemed to have been manufactured and placed on the market before that date.

The table below illustrates the accepted markings on each relevant market.

	Type of good (see list of product areas at the end of this guidance)	Accepted markings or combination of markings
Placing goods on the market in Great Britain	Manufactured goods being placed on the GB market until the end of 2021	UKCA or CE
	Manufactured goods placed on the GB market from 1 Jan 2022	UKCA
Placing qualifying Northern Ireland goods on the market in Great Britain (unfettered access)	Qualifying Northern Ireland goods being placed on the GB market under unfettered access	CE or CE and UKNI

[Placing manufactured goods on the market in Great Britain - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/placing-manufactured-goods-on-the-market-in-great-britain) (extracted 6/4/21)

CE Marking for manufacturers who wish to supply in Europe from the UK

We are now manufacturers outside of the EU since 1st January 2021 and we will therefore need to ensure we have an authorised representative for importing into the EU.

Self-declaration (not the same as self-test) is required and submitted to a third party notified body from EU27 to obtain a CE Mark. It will not be provided by a UK certified body unless they have an EU identified division which is listed as being able to provide this.

Existing CE marked products can be made available on the UK market after 1st January and there is no current time limit. Current stock will still be able to be placed on the market.

Requirements for marking will remain the same for CA as they are for CE – legibility, size, proportion, indelible and location. Until 2023 it can be shown either on the product or on accompanying documents.

The Northern Ireland position

This is subject to The NI Protocol. Products placed on the NI market are subject to EU law and CE Marking.

Notified bodies in NI are required to identify UK(NI) Mark rather than UKCA. Approved bodies in the rest of the UK can certify products for Northern Ireland as CE and UK(NI). The UKCA mark will have no relevance in Northern Ireland.

Trade negotiations will not affect this. The rest of the UK will have UKCA marking and it is intended that this will remain. If you are selling to two separate markets via import/export you will require details of UK and EU importers for validation.

Manufacturers placing products on the Northern Ireland market should note:

Products must meet EU harmonised European standards, and bear either the CE marking or the CE marking & UK(NI) indication to be placed on the Northern Ireland market.

Goods with the UKCA (UK Conformity Assessed) mark alone are not accepted on the Northern Ireland market.

Where third-party conformity assessment has been carried out by a UK approved body, the economic operator must affix the UK(NI) indication in addition to CE marking. Where the

conformity assessment has been carried out by an EU-approved body, only the CE marking is required.

Products meeting Northern Ireland requirements and bearing the CE marking or CE marking with UK(NI) indication, and which are qualifying Northern Ireland goods, can be placed on the entire UK market on an ongoing basis from 1 January 2022. We intend to legislate for this in 2021. In the meantime, all such products, whether qualifying Northern Ireland goods or not, can be placed on the entire UK market until 1 January 2022.

The upshot is that you will require two DoCs but not two technical files. Best practice when listing standards is to list UK SI and EU directives.

Terminology for the UK

CE Marking

UKCA Marking

EU Declaration

CE UK(NI)

EU Directives

UK Declaration

Harmonised EU Standard

UK Statutory Instrument

EU Notified Body

UK Designated Standard

UK Approved Body

FAQ

Will we need two sets of documents to get CA and CE mark?

It is the Declaration of Conformity that is relevant so you will need two of those and they should both be referenced in your technical file.

Are current tests still valid? Yes.

Is my DoC valid? Since changes of standards are not reflected in Declarations and therefore in product compliance the question you should ask should be “Is the product still the same as the DoC currently in existence?”

If not you may well need to update your DoC.

NOTE TO PROCURERS: You must satisfy yourselves that the CE marking identified on any product is for the express standards required in UK law. CE marking of itself does not prove conformity of any product. The Declaration of Compliance identifies which standards have been applied for the CE Marking. It is a requirement of your due diligence to check that the correct CE marking is applied (see below).

Current EU Directives and UK Statutory Instruments

EMC Directive (2014/30/EU) – Electromagnetic Compatibility Regulations 2016 (SI 2016 No 1091)

[Electromagnetic Compatibility Regulations 2016: Great Britain \(publishing.service.gov.uk\)](https://www.gov.uk/publishing-service/gov-uk/emc-regulations-2016-great-britain)

[Electromagnetic Compatibility Regulations 2016: Northern Ireland \(publishing.service.gov.uk\)](https://www.gov.uk/publishing-service/gov-uk/emc-regulations-2016-northern-ireland)

Construction Products Directive (2011/305/EU)– Construction Products Regulations 2013 (SI 2013 No 1387)

[CPR \(Amendment\) \(EU Exit\) Regulations 2020.pdf](#)

Low Voltage Directive – (2014/35/EU) – Electrical Equipment Safety Regulations 2016 (SI 2016 No 1101)

[Electrical Equipment \(Safety\) Regulations 2016: Great Britain \(publishing.service.gov.uk\)](https://www.gov.uk/publishing-service/gov-uk/electrical-equipment-safety-regulations-2016-great-britain)

[Electrical Equipment \(Safety\) Regulations 2016: Northern Ireland \(publishing.service.gov.uk\)](https://www.gov.uk/publishing-service/gov-uk/electrical-equipment-safety-regulations-2016-northern-ireland)

Radio Emissions Directive – (2014/53/EU) – Radio Equipment Regulations 2017 (SI 2017 No 1206)

[Radio Equipment Regulations 2017: Great Britain \(publishing.service.gov.uk\)](https://www.gov.uk/publishing-service/gov-uk/radio-equipment-regulations-2017-great-britain)

[Radio Equipment Regulations 2017: Northern Ireland \(publishing.service.gov.uk\)](https://www.gov.uk/publishing-service/gov-uk/radio-equipment-regulations-2017-northern-ireland)

General Product Safety Regulations 2005 (SI 2005 No 1803)

[General Product Safety Regulations 2005: Great Britain \(publishing.service.gov.uk\)](https://www.gov.uk/publishing-service/gov-uk/general-product-safety-regulations-2005-great-britain)

Current Designated Standards

NOTE : This list is not exhaustive, and you are required to check which standards are relevant to the specific products

BS EN 12966:2005 (however UK requires compliance to BS EN 12966:2014)

BS EN 50293 – Road Traffic Signal Systems - EMC

BS EN 12899 – Fixed, Vertical road traffic signs

BS 8442 – Miscellaneous road traffic signs and devices – requirements and test methods

BS EN 60529 – Degrees of protection provided by enclosures (IP code)

BS EN 50556 – Road traffic signal systems

BS EN 12352 – Traffic control equipment – warning and safety light devices

BS EN 12368 – Traffic control equipment - Signal Heads

BS EN 12767 – Passive safety support structures for road equipment

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