

Latest information about the UKCA mark

The UK government has just released information about the UK domestic regime for manufactured goods, this information has been published on the UK government's website (links provided below).

In summary, any manufactured goods that are being placed on the market in Great Britain (England, Wales and Scotland), and that are currently subject to the European Union CE marking, are required to carry the UKCA mark from the 1st January 2021. There are different requirements for manufactured goods that are being placed on the market in Northern Ireland¹.

There will be a period of 12 months where CE marked goods will continue to be accepted, but there are limitations to this, as outlined below.

Eurofins CML and the UKCA mark

As a UK Notified Body, Eurofins CML will automatically become a UK Approved Body from the 1st January 2021. From this date, Eurofins CML will be able to provide the UKCA equivalent services to those currently provided as a Notified Body for the ATEX Directive.

CML B.V., our Dutch Notified Body, is unaffected by the changes and will continue to provide services as a Notified Body for the ATEX Directive within the EU.

For Eurofins CML (UK Notified Body) certificate holders, read the following section, for CML B.V. certificate holders, read the subsequent section. If you are unsure what type of certification you hold, please contact us.

Eurofins CML (UK Notified Body) certificate holders

If you currently have the following provided by Eurofins CML then please read this section²³:

- EU-Type Examination certificate
- Quality Assurance Notification (QAN)
- Storage of Technical File

EU-Type Examination certificates

For products with an EU-Type Examination certificate issued by a UK Notified Body such as Eurofins CML, and does not have an equivalent EU-Type Examination certificate issued by a non-UK Notified Body such as CML B.V., the UKCA mark is mandatory if being placed on the market in Great Britain (England, Wales and Scotland) from the 1st January 2021. A Quality Assurance Notification (QAN) issued by a UK Approved Body will also be required.

¹ Different requirements exist for Northern Ireland, they have not been included in this document but can be found at <https://www.gov.uk/government/publications/moving-goods-under-the-northern-ireland-protocol>

² "Type" Examination certificates, such as certification for Category 3 electrical equipment, are not included here as they are not certificates issued by a Notified Body.

³ Unit Verification certificates are intentionally not included in this list as the certification is generally issued in conjunction with the product being placed on the market.

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If the same product is to be placed on the EU market after the 1st January 2021 then you need to take action now as you will need an EU-Type Examination certificate and Quality Assurance Notification (QAN) issued by a non-UK Notified Body, such as CML B.V..

Quality Assurance Notification (QAN)

For manufacturers with a Quality Assurance Notification (QAN) issued by a UK Notified Body such as Eurofins CML, and do not have an equivalent Quality Assurance Notification (QAN) issued by a non-UK Notified Body such as CML B.V., any products manufactured under that Quality Assurance Notification (QAN) that are being placed on the market in Great Britain (England, Wales and Scotland) from the 1st January 2021 are required to have a UK Approved Body Type Examination certificate and carry the UKCA mark.

If the same product is to be placed on the EU market after the 1st January 2021 then you need to take action now as you will need an EU-Type Examination certificate and Quality Assurance Notification (QAN) issued by a non-UK Notified Body, such as CML B.V..

Storage of Technical Files

Technical files are typically submitted for storage to a Notified Body at the time of the product being placed on the market and the product is a single production item. In this case, no action is required to be taken.

If the product is subject to serial production, and a technical file has been submitted for storage at a Notified Body, the following considerations will have to be made with regards to any products placed on the market after the 1st January 2021.

Technical file storage of serial production products

For products with a technical file currently stored by a UK Notified Body, and do not have an equivalent storage at a non-UK Notified Body, the UKCA mark is mandatory if being placed on the market in Great Britain (England, Wales and Scotland) from the 1st January 2021.

If the same product is to be placed on the EU market after the 1st January 2021 then action needs to be taken now as a technical file will be required to be stored at a non-UK Notified Body, such as Eurofins CML B.V..

CML B.V. (Dutch Notified Body) certificate holders

If you currently have the following provided by CML B.V. then please read this section⁴⁵:

- EU-Type Examination certificate
- Quality Assurance Notification (QAN)
- Storage of Technical File

EU-Type Examination certificates

For products with an EU-Type Examination certificate issued by a non-UK Notified Body, the CE mark can continue to be applied until the 1st January 2022 if being placed on the market in Great Britain (England, Wales and Scotland). A Quality Assurance Notification (QAN) issued by a non-UK Notified

⁴ "Type" Examination certificates, such as certification for Category 3 electrical equipment, are not included here as they are not certificates issued by a Notified Body.

⁵ Unit Verification certificates are intentionally not included in this list as the certification is generally issued in conjunction with the product being placed on the market.

Body will be required. If the product is to continue to be placed on the market in Great Britain after the 1st January 2022 then certification from a UK Approved body such as Eurofins CML should be sought prior to this date.

There are no actions required if the same product is to be placed on the EU market after the 1st January 2021 so long as any applicable Quality Assurance Notification (QAN) is issued by a non-UK Notified Body, such as CML B.V..

Quality Assurance Notification (QAN)

For manufacturers with a Quality Assurance Notification (QAN) and products with an EU-Type Examination certificate issued by a non-UK Notified Body, the CE mark can continue to be applied until the 1st January 2022 to those products if they are being placed on the market in Great Britain (England, Wales and Scotland). If the manufacturer is to continue to place product on the market in Great Britain after the 1st January 2022 then a Quality Assurance Notification (QAN) and EU-Type Examination certificates from a UK Approved body such as Eurofins CML should be sought prior to this date.

There are no actions required if the same manufacturer is to place the same products on the EU market after the 1st January 2021 so long as any applicable Quality Assurance Notification (QAN) and EU -Type Examination certificates are issued by a non-UK Notified Body, such as CML B.V..

Storage of Technical Files

Technical files are typically submitted for storage to a Notified Body at the time of the product being placed on the market and the product is a single production item. In this case, no action is required to be taken.

If the product is subject to serial production, and a technical file has been submitted for storage at a Notified Body, the following considerations will have to be made with regards to any products placed on the market after the 1st January 2021.

Technical file storage of serial production products

For products with a technical file currently stored by a non-UK Notified Body such as CML B.V., and does not have an equivalent storage at a UK Notified Body such as Eurofins CML, the CE mark may continue to be applied to those products up to the 1st January 2022 if they are being placed on the market in Great Britain (England, Wales and Scotland). If the manufacturer is to continue to place product on the market in Great Britain after the 1st January 2022 then a technical file will be required to be lodged with a UK Approved body such as Eurofins CML.

There are no actions required if the same product is to be placed on the EU market after the 1st January 2021.

Declaration of Conformity

A Declaration of Conformity will be required for UKCA marked products. However, the Declaration of Conformity for UKCA differs to the EU Declaration of Conformity in the following ways:

- "EU" is removed from the title, so "Declaration of Conformity" only.
- Any references to Union harmonisation legislation is replaced with the UK statutory requirements. So, for ATEX, "Directive 2014/34/EU" is to be replaced with "SI 2016 No. 1107".
- Any reference to "harmonised" standards is to be reworded to reference "designated" standards.
- Any reference to "notified" bodies is to be reworded to reference "approved" bodies.
- Any UK Notified Body 4-digit numbers will remain the same when they become a UK Approved Body. So, for example, Eurofins CML is currently 2503, this will remain the same after the 1st January 2021 when Eurofins CML becomes a UK Approved Body.

Useful links

The following are links to the UK government website and provides more generic guidance on the UKCA mark:

1. Placing UKCA and CE marked goods on the GB market from 1st January 2021: www.gov.uk/guidance/placing-manufactured-goods-on-the-market-in-great-britain-from-1-january-2021
2. Placing manufactured goods on the EU market from 1st January 2021: www.gov.uk/guidance/placing-manufactured-goods-on-the-eu-market-from-1-january-2021
3. Prepare to use the UKCA marking from 1st January 2021: www.gov.uk/guidance/using-the-ukca-mark-from-1-january-2021
4. Conformity assessment bodies: status from 1st January 2021: www.gov.uk/guidance/conformity-assessment-bodies-change-of-status-from-1-january-2021