

Preliminary Guidance on UKCA mark

This paper provides initial guidance on the introduction of the **UKCA mark** in the United Kingdom, and of the **UKNI mark** in Northern Ireland. These 2 new markings came into effect on 1st January 2021 for construction products as for many other products.

A transition period is foreseen until 31 December 2022. During 2021 and 2022, products placed on the Great Britain market can be marked with either the UKCA or the CE mark, or both. The recognition of CE marking in Great Britain will end on the 1st January 2022. As of this date, products placed on the Great Britain market must carry the UKCA mark. Businesses willing to sell their products in Great Britain and to affix the UKCA marking will have to use a UK-recognized “approved body” by 1st January 2023.

As legal basis, the UK Government has published an amendment to the Construction Product Regulation (CPR):

▶ **The Construction Products (Amendment etc.) (EU Exit) Regulations 2020**

Further guidance by the UK Government is available under to following links:

- ▶ <https://www.legislation.gov.uk/ukxi/2019/465/made>
- ▶ <https://www.gov.uk/guidance/construction-products-regulation-from-1-january-2021>
- ▶ <https://www.gov.uk/guidance/using-the-ukca-mark-from-1-january-2021>

While many details of the new procedure are still open, the framework is fixed:

- UK “notified bodies” will automatically become **UK “approved bodies”**
- All existing Harmonized European standards will become **Designated UK standards**, see <https://www.gov.uk/uk-market-conformity-assessment-bodies?page=3>
- **UK notified body CE certificates for type testing** can be used by the manufacturer to support UKCA marking (but must be maintained)
- **UK notified body certificates cannot be used to support CE marking** after the 1st January 2021
- CE marks affixed after the 1st January 2021 must be **supported by an EU27 notified body certificate** (AVCP 1, 1+ and 2+)
- **EU27 notified body certificates cannot be used to support UKCA marking**
- Products legitimately CE marked and circulating on the EU28 market **prior to 1st January 2021 can continue to circulate**, but the distributor or importer must be able to demonstrate that they were placed on the market prior to 1st January 2021.
- A UK distributor of an EU27 product will become an importer
- UK manufacturers that export to the EU27 will need to **appoint an importer in the EU27**
- In Northern Ireland, the **UKNI mark and the CE mark** need to be affixed.



The marking requirements and logos are given below:

Country	Relevant mark
England, Scotland, and Wales	UK CA
Northern Ireland	UK NI or UK NI and CE
Ireland	CE
Other EU member states	CE



For further information, please check the **Glass and Glazing Federation’s (GGF)** presentation below (link): [The future of CPR and CE marking](#)

Several questions remain unanswered:

- Will an abbreviated/simplified UK CA Mark and UK NI Mark be acceptable as we have seen for CE Marking (reference [Glass for Europe guide to CE Marking](#))?
- What happens if no UK Approved Bodies can carry out Type Testing? Will it be acceptable to continue to use an EU27 Notified Body provided the Type Tested referenced in the hEN and corresponding UK designated standard are the same?
- For a manufacturer supplying all countries in the UK as well as Ireland, is it acceptable to supply a product affixed with all three marks – UK CA, UK NI and CE? (We have heard that products affixed with UK CA Mark in addition to CE Marking may not be acceptable in EU27 – but there has been no formal confirmation of this from any of the EU institutions, e.g. European Commission).
- It is the Commission services’ view that the UK marking (as any third country marking) can be affixed to a product which bears the CE marking, provided that such marking does not create confusion with the CE marking. This confusion may either refer to the meaning or the form of CE marking (see Article 30(5) of Regulation 765/2008). Therefore, the UK marking as well as any other information concerning UK legislation must be separate from the CE marking and information concerning EU legislation. This applies also to the Declaration of Performance/Conformity. The DoP drawn for the purposes of compliance with EU legislation should not be used for the purposes of UK legislation.
- If the UK CA Mark in GB (and UK NI Mark in Northern Ireland) only needs to be affixed when the product is placed on the market, is it acceptable for a product imported into the UK from EU27 to have the CE Marking affixed at point of entry into the UK (i.e. customs) provided it is subsequently relabeled with UK CA or UK NI Mark in UK before being placed on the market?

More detailed guidance will be provided by Glass for Europe once more details are known.





Glass for Europe is the trade association for Europe's flat glass sector. Flat glass is the material that goes into a variety of end products, primarily in windows and facades for buildings, windscreens and windows for automotive and transport as well as solar energy equipment, furniture and appliances. Glass for Europe brings together multinational firms and thousands of SMEs across Europe, to represent the entire building glass value-chain. It is composed of flat glass manufacturers, AGC Glass Europe, Guardian, NSG-Group, Saint-Gobain Glass Industry, and works in association with national partners gathering thousands of building glass processors and transformers all over Europe.

