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The complete guide  
to UKCA marking

# E-book: The complete guide to UKCA marking



## Background

UKCA marking replaces the European CE-marking as part of Brexit. Since 2021, this marking has been the product conformity marking in the United Kingdom (England, Wales and Scotland).

To allow companies time to adjust, a transition period has been agreed in which products with CE-marking have still been accepted in the United Kingdom (UK). However, on 1 January 2025, this transition period comes to an end, and companies that wish to maintain their market access to England, Wales and Scotland after 31 December 2024 need to start adopting the UKCA marking.

This guide will provide you with:

- An overview of the requirements associated with UKCA marking
- Differences between UKCA marking and CE-marking
- Important details regarding the UK market access requirements for electrical products.



## What should manufacturers/ importers be aware of?

If manufacturers are placing a product on the UK market from another market, they need to ensure they comply with new UK importer responsibilities.

One key requirement for the UK is that the importer information must be provided on the equipment if the product is being placed on the market in Great Britain from another country.

The requirement that is presently in force requires identification of the importer's name, registered trade name or mark as well as a postal address to be indicated either on the equipment, packaging or accompanying documentation.

However, from 1 January 2025, the importer identification shall need to be on the equipment, unless this is not possible, for example due to the size of the equipment or other acceptable rationale.

For UK, the Economic operators under the relevant legislation can be either a **manufacturer**, an **importer**, an **authorized representative** or a **distributor** (see box for definition).

### **Manufacturers**

A manufacturer is normally an individual or business who manufactures a product, or has a product designed or manufactured and markets that product under their own name or trademark.

For instance, an importer who markets a good under their name and trademark is usually considered to be the manufacturer and assumes the responsibilities of a manufacturer.

### **Importers**

An importer is anybody (individual or business) established in the UK who supplies a product from outside the UK for distribution, consumption or use on the Great Britain (GB) market during a commercial activity.

### **Authorised representatives**

An authorised representative (AR) is anybody (an individual or company) who is appointed by a manufacturer to carry out certain agreed specified tasks (for example, drawing up a UK Declaration of Conformity for a manufacturer) on their behalf, as defined in the relevant product legislation.

If an AR is importing a product, then they also adopt the obligations of the importer too. There is a limit as to what the authorised representative can do. They are not responsible for safety and compliance, for example. An AR cannot act as a manufacturer. If used, ARs must be established in the UK.

### **Distributor**

A distributor is a person in the supply chain, other than the manufacturer or importer, who makes products available on the GB market. If a person is bringing in a product from outside of the UK and placing it on the market, they will be considered an importer under the legislation and therefore these persons cannot be distributors.

Source: [GOV.UK, Guidance, UKCA marking: roles and responsibilities](#)

## Key differences between UKCA marking and CE-marking

The UKCA marking has some differences in labelling and regulations compared to the CE-marking:

### Labelling

- The Label will indicate the UKCA mark for the UK market, while the CE mark is indicated for the EU and Northern Ireland\*. Both may be placed on the same label. In Northern Ireland, the UKCA marking is not recognised as proof of conformity and has no validity there
- The UK government will introduce legislation so that the UKCA marking can be placed on a label affixed to the product OR on a document accompanying the product until **31 December 2027**.
- The CE and UKCA mark need to be visible, legible, be at least 5mm in height and can be solid or hollow for example, as long as it remains visible and legible.

*\* Products which are subjected to certification and are sold in Northern Ireland, will need either UKNI or CE marking dependent on where the Approved Body or Notified Body is based – see below image for an overall guideline. CE is not permitted for use on product for Northern Ireland if a UK-based Approved Body is involved in the conformity assessment procedure.*

### User Manual

- For radio transmitter products, the user manual for EU and UK shall need to include the transmit frequency and output power information
- If a full Declaration of Conformity (DoC) is not provided with the product, the user manual for UK purposes needs to include a reference similar to the following where the user can obtain the full Declaration of Conformity document together with the following text:

*Hereby, <<Company Name>> declares that this <<type of equipment>> is in compliance with the essential requirements and other relevant provisions of <<insert UK Regulation name>>. The declaration of conformity may be consulted at [www.address.com/DoC.pdf](http://www.address.com/DoC.pdf).*

|                                                                                                                                              | EU                                                                                  | UK                                                                                   | NI                                                                                    |
|----------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------|
| If a UK-based Approved Body issues a UK Certification for a product, then the product is required to indicate "UK(NI)" for Northern Ireland. |  |  |  |
| If an Approved Body based outside of the UK issues a UK Certification for a product, then the product does not need the UKNI mark.           |  |  |  |

## Declaration of Conformity (DoC)

- Manufacturer or his authorized representative must draw up a **UK Declaration of Conformity (DoC)** with respect to UK legislation, whereas for EU, the manufacturer or his authorized representative must draw up an **EU Declaration of Conformity (DoC)** with respect to applicable EU directives.

The information required on the UK Declaration of Conformity is largely the same as what was required on an EU Declaration of Conformity. This can vary depending on the applicable legislation but generally should include:

- Your (the manufacturer's) name and full business address and that of your authorised representative (if applicable)
- The product's serial number, model or type identification
- A statement, stating you take full responsibility for the product's compliance
- The details of the approved body which carried out the conformity assessment procedure (if applicable)
- The relevant legislation with which the product complies
- The name and signature of the person authorised to sign on behalf of the manufacturer or their authorised representative
- The date the declaration was issued
- Supplementary information (if applicable)

The EU declaration of conformity must be translated into the language or languages required by the Member State in which the product is placed or made available on the market. If a translation of the EU declaration of conformity has been produced by another economic operator and is not signed by the manufacturer, a copy of the original EU declaration of conformity signed by the manufacturer must also be provided together with the translated version.

Source: [GOV.UK](#), [Guidance](#), [UKCA marking: conformity assessment and documentation](#)





## Technical documentation

### Record keeping

You, or your authorised representative (where allowed for in the relevant legislation), must keep documentation to demonstrate that your product conforms with the regulatory requirements.

This must generally be kept for 10 years after the product is placed on the market.

You must keep general records of:

- How the product is designed and manufactured
- How the product has been shown to conform to the relevant requirements
- The address of the manufacturer and any storage facilities

In addition: The importer must ensure that equipment is accompanied by instructions which are in easily understandable English.

### Regulations

For the UK, Approved Bodies are responsible for issuing a separate UK Radio Equipment Regulation Type Examination Certification (TEC).

For the EU, Notified Bodies are responsible for issuing an EU Radio Equipment Regulation Type Examination Certification (TEC).

If UK designated standards or EU harmonized standards are not available/used for radio spectrum requirements or not applied in full as relevant to the product, then a Type Examination Certification is **mandatory** for evaluation of the product for portions (or all, if desired) of the radio spectrum essential requirements.

In addition, if compliance with EU Radio Equipment Directive Articles 3.3 (d, e, f, or g) is desired to be established, an EU Radio Equipment Directive Type Examination Certification is **mandatory** for evaluation of certain products for essential requirements such as Cyber security, Personal Data Privacy, Fraud and Access to Emergency Services.

## Designated standards

The lists of designated standards are frequently modified and updated.

The links below leads to pages where you'll always find the current and previous versions of the lists.

- [Designated standards: Radio equipment](#)
- [Designated standards: EMC](#)
- [Standards: General product safety](#)
- [Designated standards: RoHS](#)
- [Designated standards: Energy Efficiency](#)
- [Designated standards: Machinery](#)
- [Designated standards: low voltage](#)

## Current regulations

Below is a list of the regulations that apply for the EU market and the UK market:

| EU legislation                                                                                                                                           | UK legislation                                                                                                                                                                                      |
|----------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Toy Safety – Directive 2009/48/EC                                                                                                                        | Toys (Safety) Regulations 2011                                                                                                                                                                      |
| Recreational craft and personal watercraft - Directive 2013/53/EU                                                                                        | Recreational Craft Regulations 2017                                                                                                                                                                 |
| Simple Pressure Vessels – Directive 2014/29/EU                                                                                                           | Simple Pressure Vessels (Safety) Regulations 2016                                                                                                                                                   |
| Electromagnetic Compatibility – Directive 2014/30/EU                                                                                                     | <a href="#">Electromagnetic Compatibility Regulations 2016</a>                                                                                                                                      |
| Low Voltage Directive 2014/35                                                                                                                            | <a href="#">Electrical Equipment (Safety) Regulations 2016</a>                                                                                                                                      |
| Non-automatic Weighing Instruments – Directive 2014/31/EU                                                                                                | Non-automatic Weighing Instruments Regulations 2016                                                                                                                                                 |
| Measuring Instruments – Directive 2014/32/EU                                                                                                             | Measuring Instruments Regulations 2016                                                                                                                                                              |
| Lifts – Directive 2014/33/EU                                                                                                                             | Lifts Regulations 2016                                                                                                                                                                              |
| ATEX – Directive 2014/34/EU                                                                                                                              | <a href="#">Equipment and Protective Systems Intended for use in Potentially Explosive Atmospheres Regulations 2016</a>                                                                             |
| Radio equipment – Directive 2014/53/EU                                                                                                                   | <a href="#">Radio Equipment Regulations 2017</a>                                                                                                                                                    |
| Pressure equipment –Directive 2014/68/EU                                                                                                                 | Pressure Equipment (Safety) Regulations 2016                                                                                                                                                        |
| Personal protective equipment – Regulation (EU) 2016/425                                                                                                 | Regulation 2016/425 on personal protective equipment as brought into UK law and amended                                                                                                             |
| Gas appliances – Regulation (EU) 2016/426                                                                                                                | Regulation 2016/426 on gas appliances as brought into UK law and amended                                                                                                                            |
| Machinery Directive 2006/42/EC                                                                                                                           | <a href="#">Supply of Machinery (Safety) Regulations 2008</a>                                                                                                                                       |
| Outdoor Noise Directive 2000/14/EC                                                                                                                       | Noise Emission in the Environment by Equipment for use Outdoors Regulations 2001                                                                                                                    |
| All Ecodesign implementing measures made under Ecodesign Directive 2009/125/EC (and Directive 92/42/EEC as far as this is relevant to hot-water boilers) | See Schedule 1 to The Ecodesign for Energy-related Products Regulations 2010 (as amended) for the applicable implementing measures which apply in Great Britain and Northern Ireland, respectively. |
| Restriction of the Use of certain Hazardous Substances in Electrical and Electronic Equipment (RoHS) - Directive 2011/65/EU                              | <a href="#">The Restriction of the Use of Certain Hazardous Substances in Electrical and Electronic Equipment Regulations 2012</a>                                                                  |

## Other common questions on UKCA marking

### UKCA in other territories

The UKCA marking does not apply in the Crown Dependencies: The Isle of Man, Guernsey and Jersey.

The UKCA marking does not apply in the British Overseas Territories.

Requirements in these territories need to be checked with the relevant governing authorities.

Source: [GOV.UK, Guidance, Placing manufactured products on the market in Great Britain](#)

### Spare parts

Products which are repaired, refurbished or exchanged without changing their original performance, purpose, or type, are not considered 'new' and therefore do not need to be recertified and remarked.

If the product has been subject to important changes, substantially changing its original performance, purpose, or type, it will be considered as a 'new' product.

Source: [GOV.UK, Guidance, Placing manufactured products on the market in Great Britain](#)

### Products sold online

If fully manufactured products are made available online and targeted at GB market end users, such that an offer for the transfer of ownership, possession, or any other property right in those products are made, they are considered placed on the GB market. If this happens after 11pm on 31 December 2024, such products will require the UKCA marking.

Source: [GOV.UK, Guidance, Placing manufactured products on the market in Great Britain](#)

### Existing imported CE-marked stock

Fully manufactured and conformity assessed CE-marked products which have been imported into GB under contract before 11pm on 31 December 2024 are considered as 'placed on the GB market'.

Therefore, these products do not need to undergo any re-testing and re-certification or re-labelling to meet UKCA requirements.

Source: [GOV.UK, Guidance, Placing manufactured products on the market in Great Britain](#)

### Penalties

A person committing an offence under the 2016 Regulations is liable to a penalty. Penalties can include:

- a fine or prison sentence of up to three months or to both on summary conviction, or
- a fine or prison sentence of up to two years or both on conviction on indictment

While it is a matter for the enforcement authority to decide whether prosecution is appropriate in each case, should a prosecution take place, it is at the discretion of the court to decide the penalties imposed on the offender.

Source: [Statutory guidance, Electrical Equipment \(Safety\) Regulations 2016: Great Britain](#)



## How can Nemko help?

Nemko is listed as an Approved Body for Radio Equipment in the UK (UK Approved Body 1622). This means that Nemko can issue type examination certificates covering Health and Safety, Electromagnetic Compatibility, Radio Equipment if needed for UKCA marking in accordance with UK radio regulations.

Nemko provides comprehensive test services worldwide for the UK and EU markets and can also help with advisory and test plan development for your product. Nemko can also advise you on labelling and offer letters of opinion regarding compliance with UK and EU regulations.

Using a certification body outside of the UK is an advantage as UK based certification bodies most likely will be overloaded with work when the deadline quickly approaches, and they are not presently approved as Notified Bodies for the EU.

*The information in this document is provided by Nemko as general guidance and is offering general information. We have made an effort to ensure that the information is accurate and reliable. Regulatory changes are however updated frequently and we can therefore not guarantee that the information provided is always up to date. Nemko shall not be liable for any direct, indirect or consequential loss or damage arising from the use of the information in the document. For the most up to date information or detailed application guidelines, please contact us.*



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