

UKCA Marking for Current CE Marked Products in Great Britain Becomes Mandatory Soon

Background:

On 2022-06-20, the UK Government updated its latest Guidance for "Using the UKCA marking", confirming that the **UKCA (UK Conformity Assessed) marking** will indeed **become mandatory** for the "new approach" goods (which previously used the CE markings such as the children's toys) if they are first placed on the market in Great Britain (England, Wales and Scotland) after 2022-12-31.

It is important to note that, when affixing the UKCA marking (optional now and mandatory after 2022-12-31), the manufacturer or the authorized representative take full responsibility for the product's conformity with the requirements of the relevant UK legislations, not the EU Directives.

Transition Milestones:

Effective Date	UKCA Marking	CE Marking	Remarks
2021-01-01	Came into Effect	Still Allowed	In most cases, manufactured goods (including children's toys) that are lawfully CE marked will be accepted in the UK without UKCA marking until 2022-12-31. That is, either UKCA or CE markings can be used in this transition period (see Note).
2023-01-01	Mandatory	Not Allowed	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 2025-12-31.
2026-01-01	Mandatory	Not Allowed	UKCA marking must be indelibly displayed on the product itself.

Note: Unless in special cases that are covered by legislation which requires the UKCA marking and mandatory third-party conformity assessment by a UK conformity assessment body.

The UKCA Mark:



Amongst other requirements, the UKCA marking must be at least 5mm in height – unless a different minimum dimension is specified in the relevant legislation, and it must be easily visible and legible.

It can take different forms (for example, the color does not have to be solid), as long as it remains visible, legible and maintains the required proportions.

UKCA vs CE Markings:

For ordinary consumer products, such as children’s toys, **self-declaration of conformity** for UKCA marking is basically the same as for CE marking, and the **technical requirements** (“essential requirements”) are largely the same too.

Nevertheless, legally speaking, declaration of conformity with all essential requirements in connection with the UKCA marking is different with that declared via the CE Marking, as detailed in the following table.

Item	UKCA marking	CE marking	Note
Geographical Scope	For Use Only in Great Britain (England, Wales and Scotland)	For Use Only in the EU	The UKCA marking alone cannot be used for goods placed on the Northern Ireland market. See the UK Government's guidance on placing goods on the Northern Ireland market.
Self-declaration	UK Declaration of Conformity	EU Declaration of Conformity	A document which must be drawn up for most products lawfully bearing the UKCA or CE marking.
Legislation with which Conformity is Declared (Example: Toys)	Toy (Safety) Regulations 2011	Toy Safety Directive 2009/48/EC	See https://www.gov.uk/guidance/using-the-ukca-marking#self-declaration for the list of legislations.
Test Standards	UK Designated Standards	EN cited in EU's Official Journal	By compliance of which manufacturers can claim “presumption of conformity” with the corresponding essential requirements.
Conformity Assessment Process	Largely the Same Modular Approach		
Approval Body	UK Approved Body	EU Notified Body	Only for goods that previously required Notified Body's certification.

References:

<https://www.gov.uk/guidance/using-the-ukca-marking>

<https://www.gov.uk/guidance/placing-manufactured-goods-on-the-market-in-great-britain>

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