

Statement on the export of products to the UK after Brexit (UKCA)

Dear Business Partners

To the best of our current level of knowledge, labelled products exported from the EU to the UK (England, Wales, and Scotland with the exception of Northern Ireland) must comply with UK regulations and standards as of January 2021 and must therefore be labelled UKCA (United Kingdom Conformity Assessment). However, there is a transitional period for industrially manufactured products until the end of 2022, during which the CE marking will continue to be valid.

For ESCHA products, the «Electrical Equipment (Safety) Regulations 2016» are relevant, which are equivalent to the EU Low Voltage Directive.

As of 1 January 2023, the CE marking will no longer be recognized and a UKCA marking will become mandatory. By the end of 2022, it is sufficient to affix this UKCA marking to a label attached to the product or an accompanying document. From 1 January 2023, the label must be placed directly on the product. Only in exceptional cases can this continue to be done via a label or accompanying documents. Manufacturers are entitled to label their products with the UKCA marking if they certify in the form of a self-declaration that applicable UK guidelines are used and complied with.

Exceptions for Northern Ireland

The CE marking will continue to be sufficient for exports to Northern Ireland. Under certain conditions, a UK(NI) label (United Kingdom (Northern Ireland)) must be applied to the products. For example, in case of mandatory or voluntary conformity assessment by a third party (UK Approved Bodies). The UKCA marking alone is insufficient for placing products on the market in Northern Ireland.

For all relevant products, we will have implemented the UKCA label by the deadline at the latest. Within the scope of the implementation, mixed deliveries might occur, including products with UKCA markings as well as CE marking exclusively.

Should you have any further questions on this topic, please do not hesitate to contact us.

Best regards from Halver

Achim Rudack
Compliance Officer