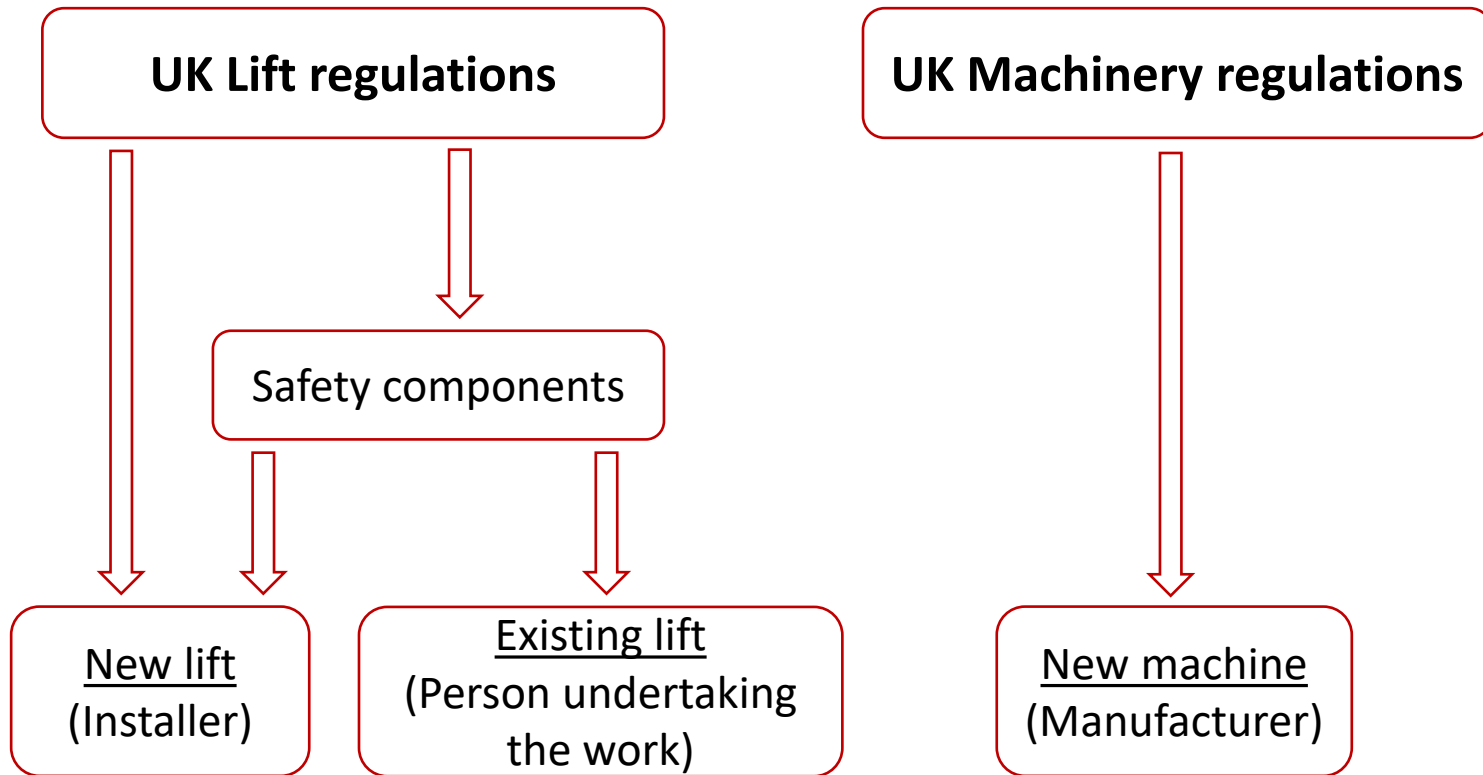




## UKCA: Product compliance and marking post Brexit

Paul Clifton 13<sup>th</sup> October 2023

## Reminder – The Persons responsible



# Reminder - Changes to key regulations

Following Brexit new UK product safety regulations were introduced from 1 January 2021



- No changes to technical requirements of EHSRs
- No changes to types of conformity assessment
- New requirements for conformity marking

From **CE** to **UKCA**

## Reminder - UK = GB + NI

Different arrangements are needed between NI and the rest of the UK which has left the single market

“UK” = “GB” + “NI”

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“GB” – Great Britain – England, Wales and Scotland

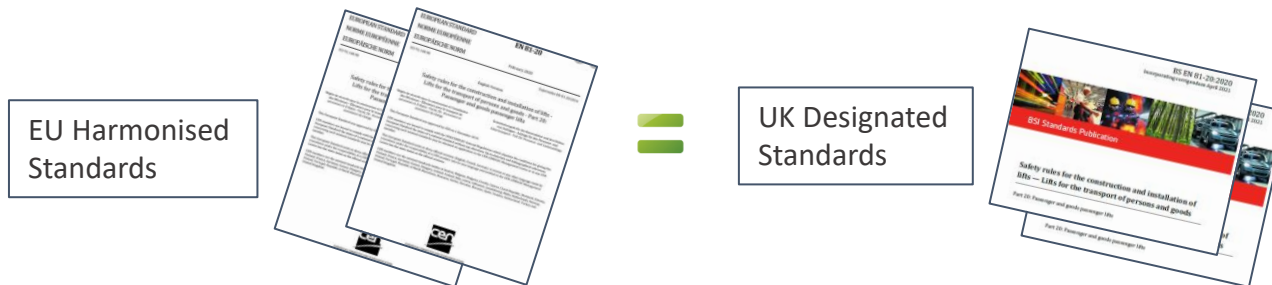
**New UKCA mark to be used**

“NI” – Northern Ireland

**CE mark + UKNI where UK Approved Body used**

# Reminder - Changes in terminology

- Harmonised standards -> “**Designated Standards**”



- UK Notified Bodies have become “**UK Approved Bodies**”
- Approved Bodies listed on new “UK-NANDO”  
<https://www.gov.uk/uk-market-conformity-assessment-bodies?keywords=lift>

# So what was the problem ?


Lack of UK Approved Body capacity

Cost and complication of recertification

Uncertainty and difficulties when supplying spares for existing lifts

Uncertainty over marking of products

## What is new?

- Four easements were announced by BEIS 20<sup>th</sup> June 2022 
- A more pragmatic approach to implementing the UKCA regime to make the transition as easy as possible for businesses
- Designed to reduce costs and burdens for businesses moving to the UKCA regime, at a time when businesses and consumers face rising prices
- *Note: UK regulations will be amended to reflect this new guidance*

# Easement 1 – Reduce re-testing costs for UKCA certification

- Allowing conformity assessment activities for CE marking completed by the 31 December ~~2022~~ 2024 to be used by manufactures as the basis for UKCA marking. This will reduce the immediate costs faced by manufacturers and will be valid until for the lifetime of the certificate issued, or until 31 December 2027 (whichever is sooner). Will enable manufacturers to apply the UKCA mark on these products without the need for any UK Approved Body involvement.
- Products must still bear UKCA marking and will need to undergo conformity assessment with a UK Approved Body at the expiry of the certificate or after 5 years (31 December 2027), whichever is sooner
- So complete lift will be UKCA marked but safety components on this complete lift can be CE marked with notified body no., + a UKCA mark





# Easement 1 – Reduce re-testing costs for UKCA certification

If Product / Component  
CE certificated and  
marked by end ~~2022~~ 2024



Can be used as  
basis of UKCA  
marking

Until

CE  
certificate  
expires

Or

By end2027

Whichever is Sooner

After which

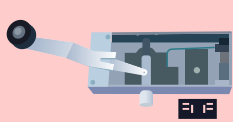
Must be UKCA certificated and  
marked

## Easement 2 – Existing imported stock

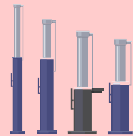


- Making it clear that there is no need to re-test and re-mark existing imported stock for goods that are manufactured, CE-marked and imported under contract into the UK by the end of ~~2022~~ 2024.
- Will allow CE marked products that are manufactured and imported into the UK by the end of ~~2022~~ 2024 to be sold, without the need to meet UKCA requirements.
- Note: A fully manufactured good is ‘placed on the market’ when a written or verbal agreement (or offer of an agreement) to transfer ownership or possession or other property rights in the product is exchanged

## Easement 3 – Safety Components - Spare Parts



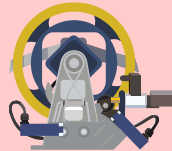
Landing locks



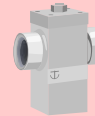
Buffers



Safety Gear



Overspeed  
Governor



Rupture  
Valve



Safety Circuits containing  
Electronic Components

- To accept spare parts onto the GB market which comply with the same conformity assessment requirements that were in place at the time the original product or system they are ultimately intended to repair, replace or maintain, was placed on the market.
- 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
- This will help to address concerns about the availability of spare parts and ensure businesses and organisations avoid disruption to their operations.

## Easement 3 – Safety Components - Spare Parts

Products which are repaired, refurbished or exchanged without changing their original performance, purpose, or type, can use the same conformity requirements that were in place at the time the original component was placed on the market

- Pre Lift Regulations
- (components with no CE mark)



- No mark ✓
- OR ✓
- CE mark ✓
- OR ✓
- UKCA mark ✓

- Lift Regulations (components with CE mark)



- No ~~mark~~ ✓
- CE mark ✓
- OR ✓
- UKCA mark ✓

- Lift Regulations (components with UKCA mark)

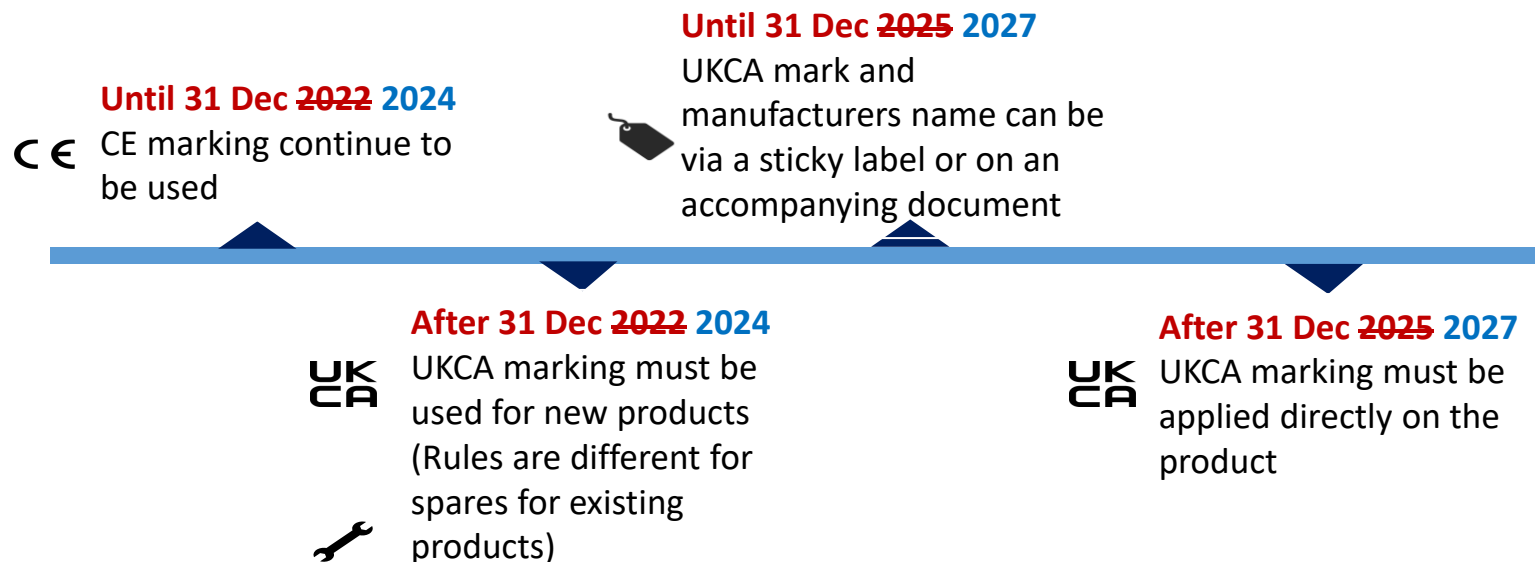


- No ~~mark~~ ✓
- CE ~~mark~~ ✓
- UKCA mark ✓

# Easement 4 – Product marking



To make it easier to label products, by continuing to allow businesses to affix the UKCA marking, and to include importer information for products from EEA countries (and in some cases, Switzerland), on an accompanying document or a sticky label **until 31 December 2025-2027**



- *Note: Both CE and UKCA mark can be placed on a product so long as neither impedes the visibility of the other and requirements of both the GB and EU legislation are met*

End of presentation

