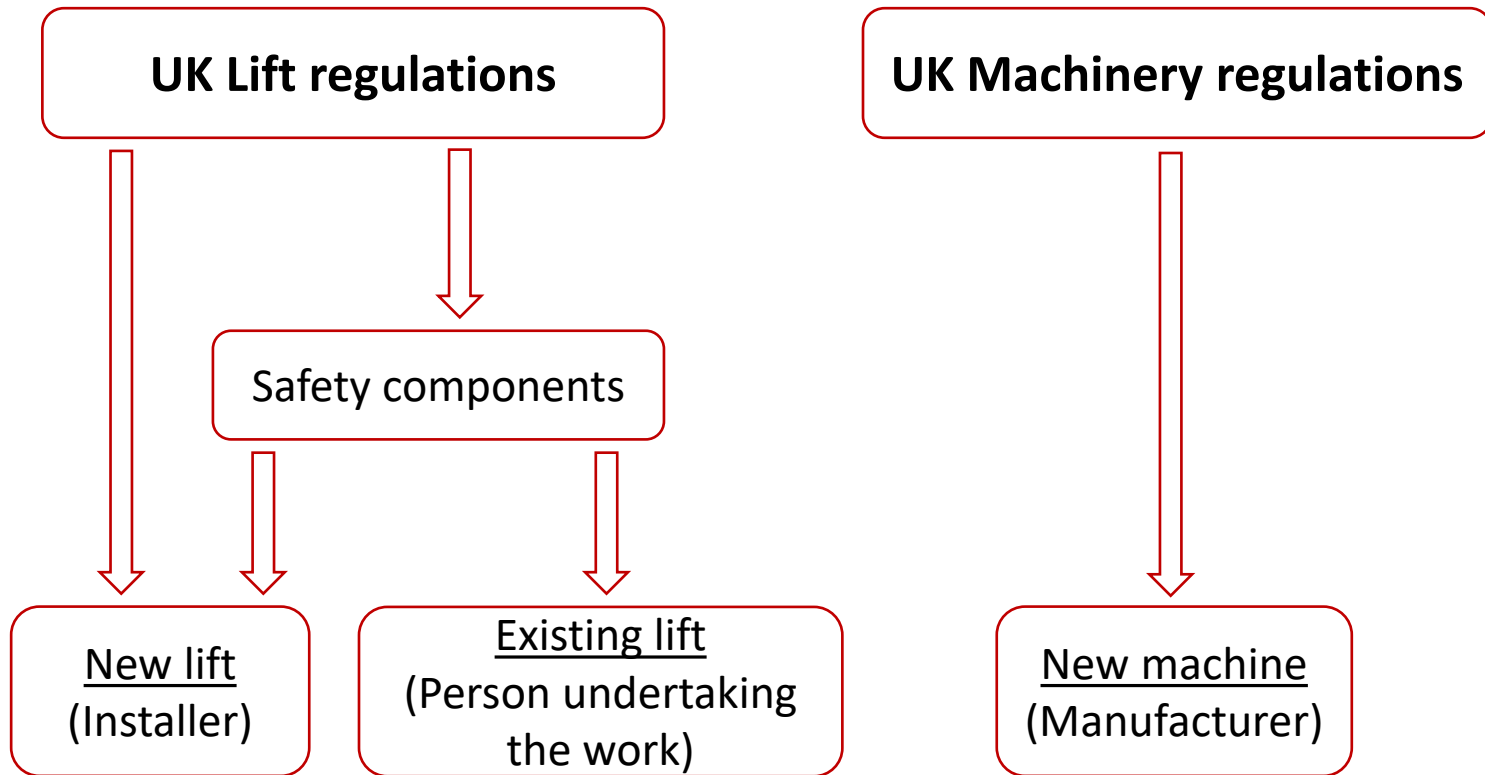




UKCA: Product compliance and marking post Brexit

Paul Clifton 13th 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 **UK CA**

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”

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

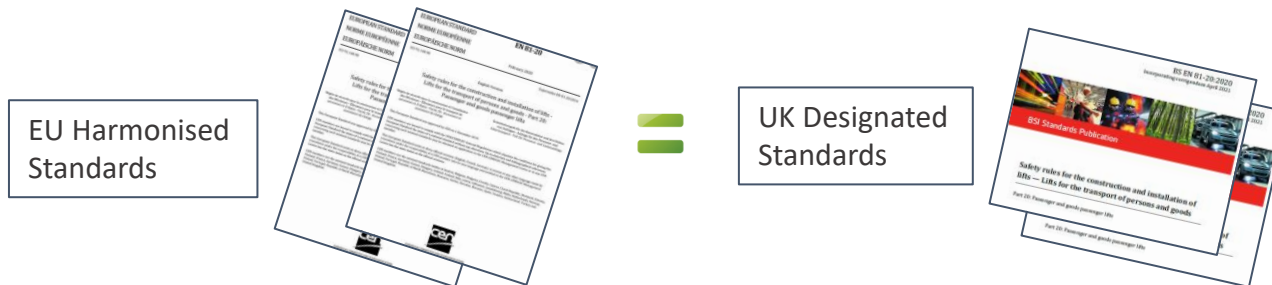
New UKCA mark to be used

“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?

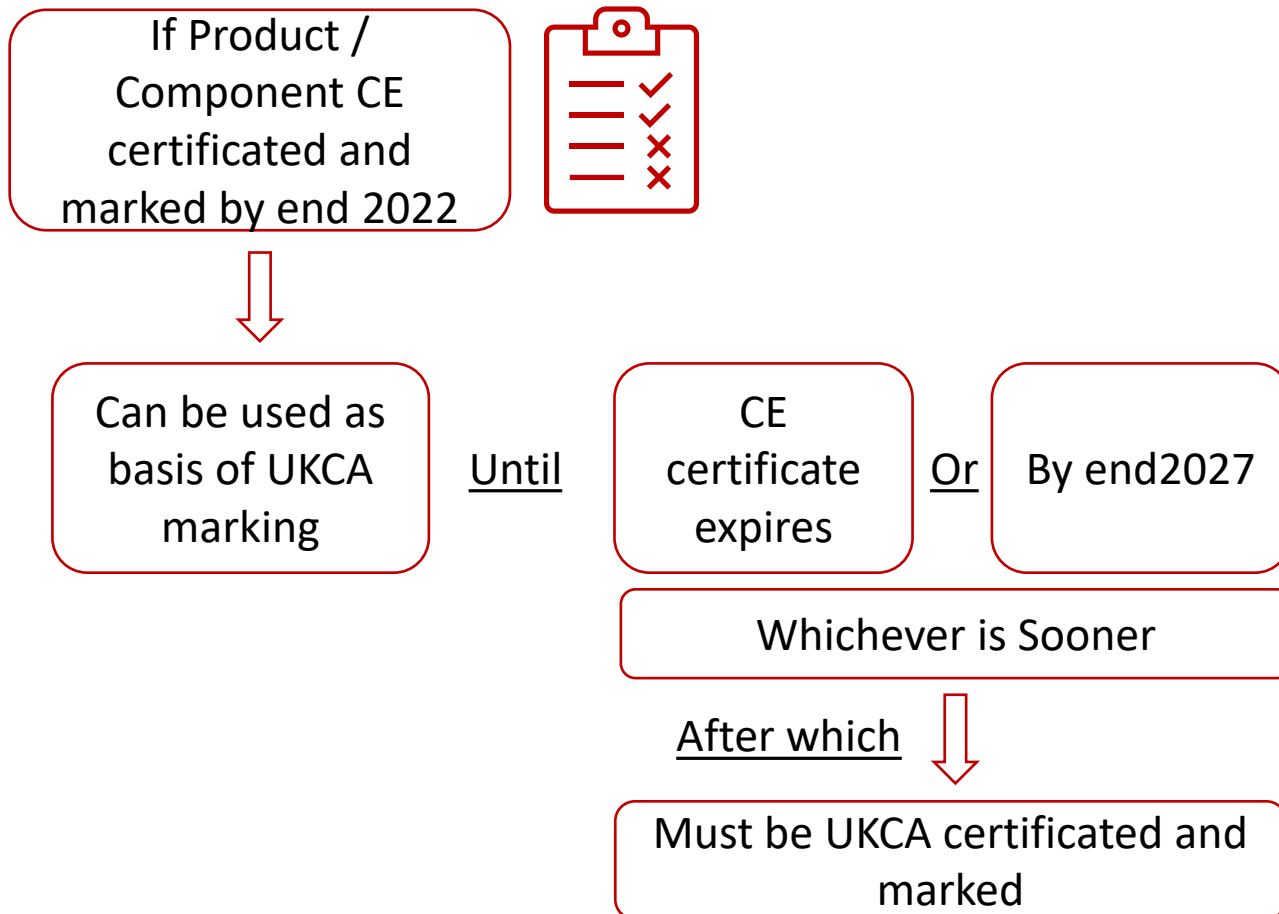
- Four easements were announced by BEIS 20th June 2022 
- A more pragmatic approach to implementing the UKCA regime to make the transition as easy as possible for businesses
- Designed to reduce costs and burdens for businesses moving to the UKCA regime, at a time when businesses and consumers face rising 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 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

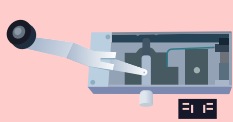


Easement 2 – Existing imported stock

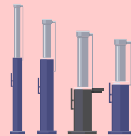


- Making it clear that there is no need to re-test and re-mark existing imported stock for goods that are manufactured, CE-marked and imported under contract into the UK by the end of 2022.
- Will allow CE marked products that are manufactured and imported into the UK by the end of 2022 to be sold, without 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



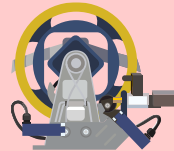
Landing locks



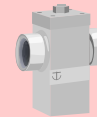
Buffers



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)

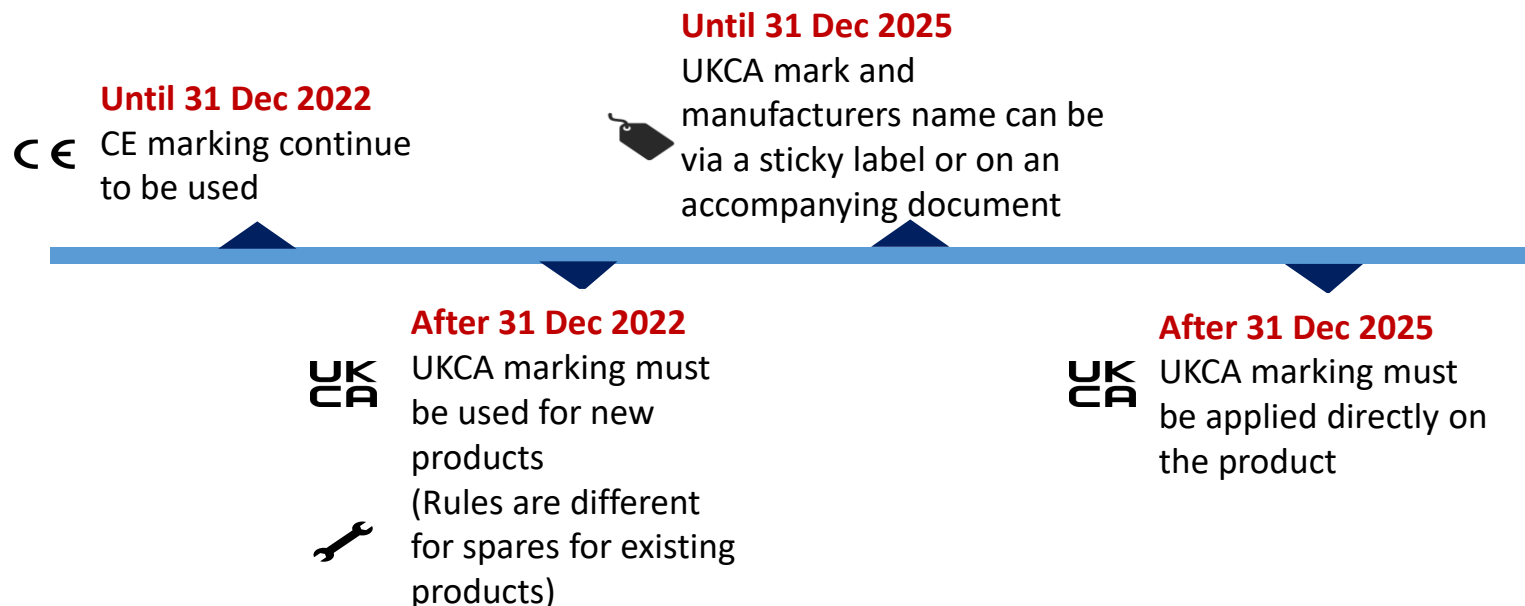


- No ~~mark~~ ✓
- CE mark ✓
- UKCA mark ✓

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**



- *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

