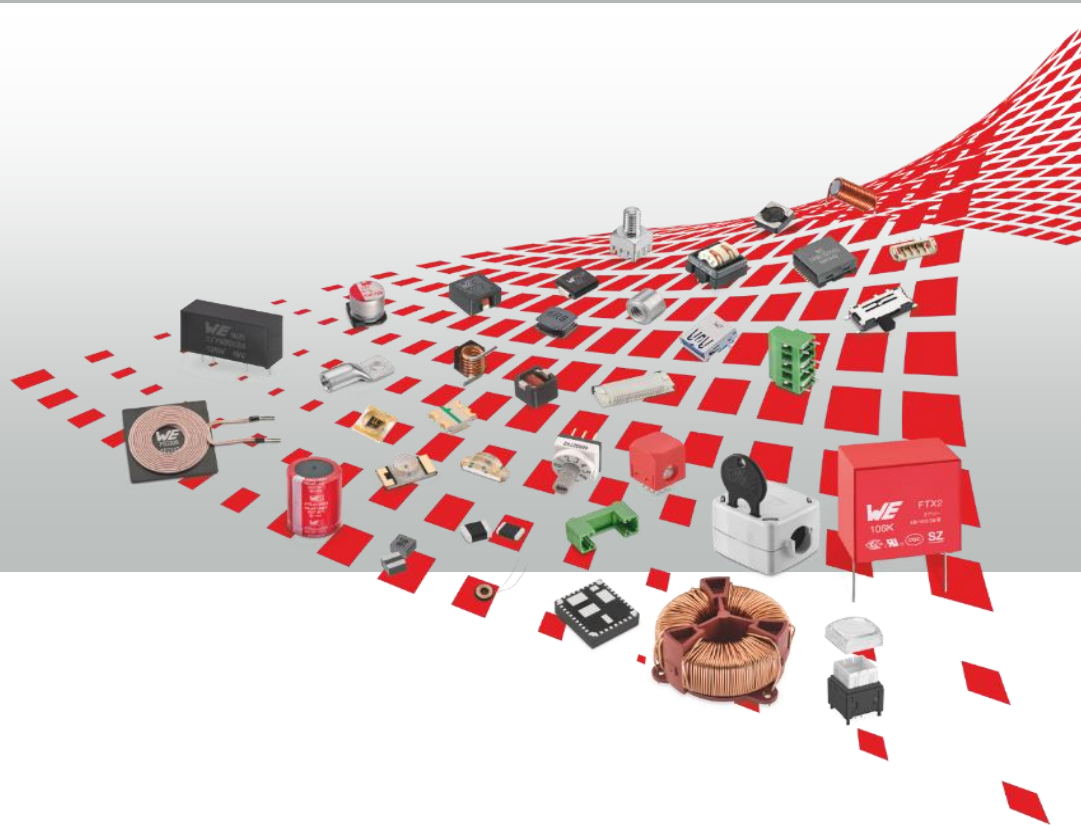


UKCA Mark

more
than you
expect



Glen Wallis
Technical Director
Würth Electronics UK

Version 2

DISCLAIMER



The contents of this presentation are **subject to change** without any notification from Wurth Elektronik eiSos. All the contents are based and aligned with the current legislation on both UK and EU on **24/08/2021**. Please always double check with the correspondent governments and authorities prior to making a decision.



Agenda



1. Brexit
2. UKCA
3. Harmonized Standards and Designated Standards
4. UKNI
5. Guidance
6. Opportunities / EMC Status Quo



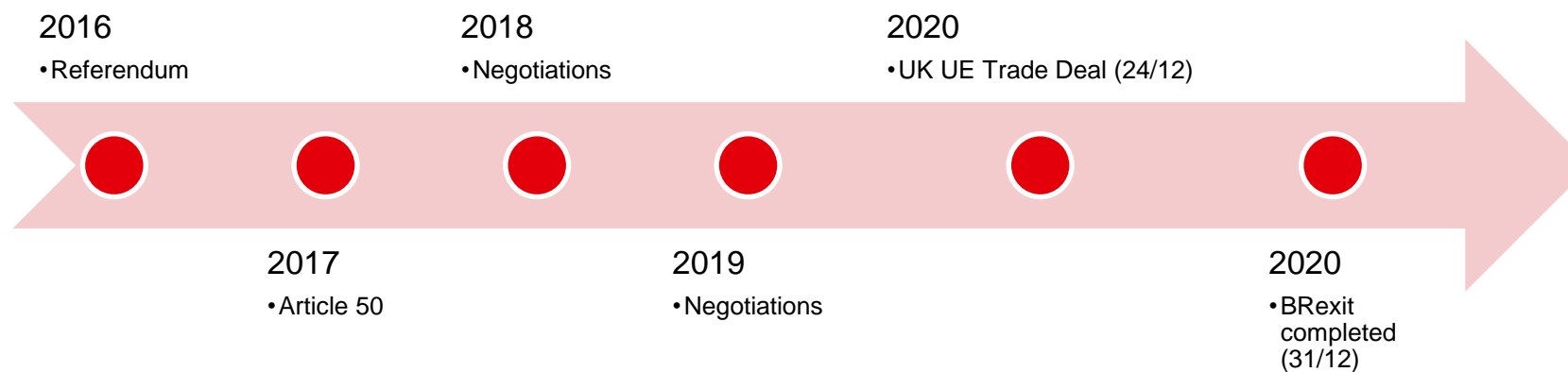


BRexit

Brexit



Brexit Timeline

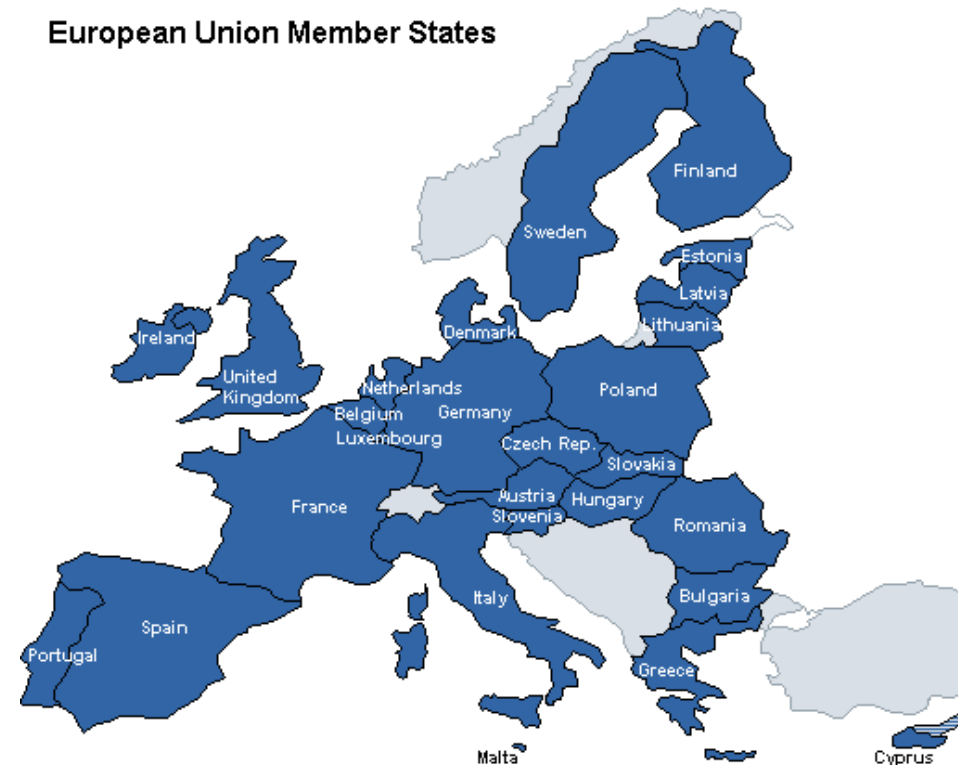


CE Marking



- With the formation of the single European market, standardization was required to remove technical barriers to trade.
- New Approach Directives were introduced to remove these barriers to trade

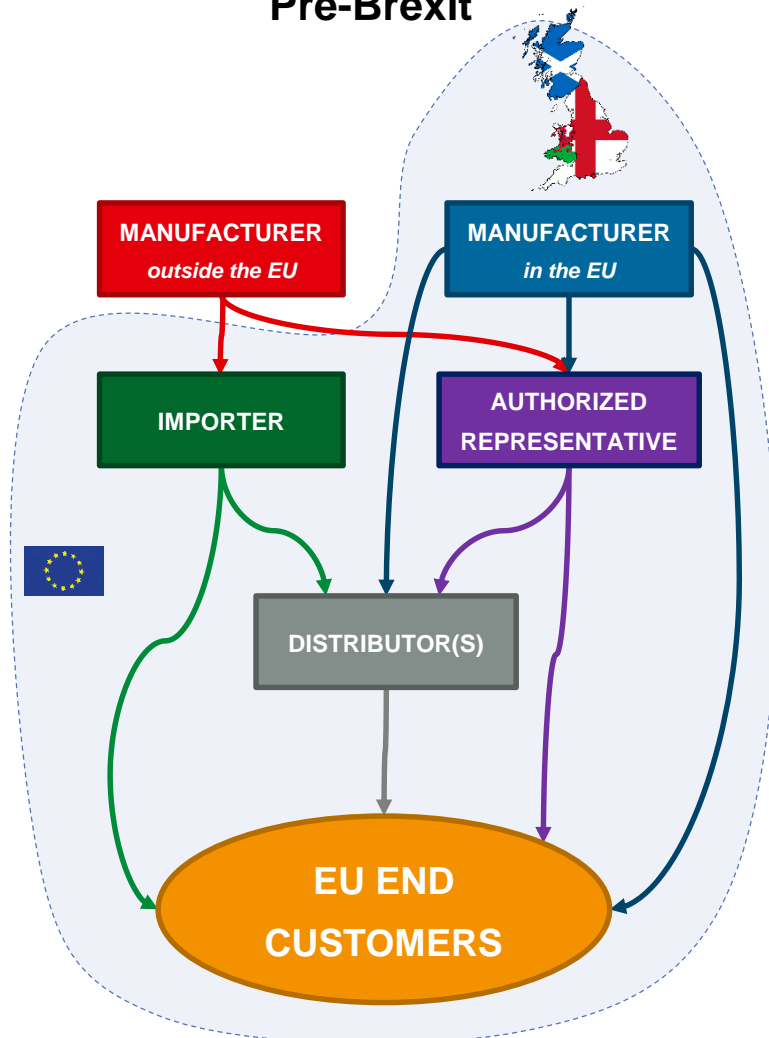
European Union Member States



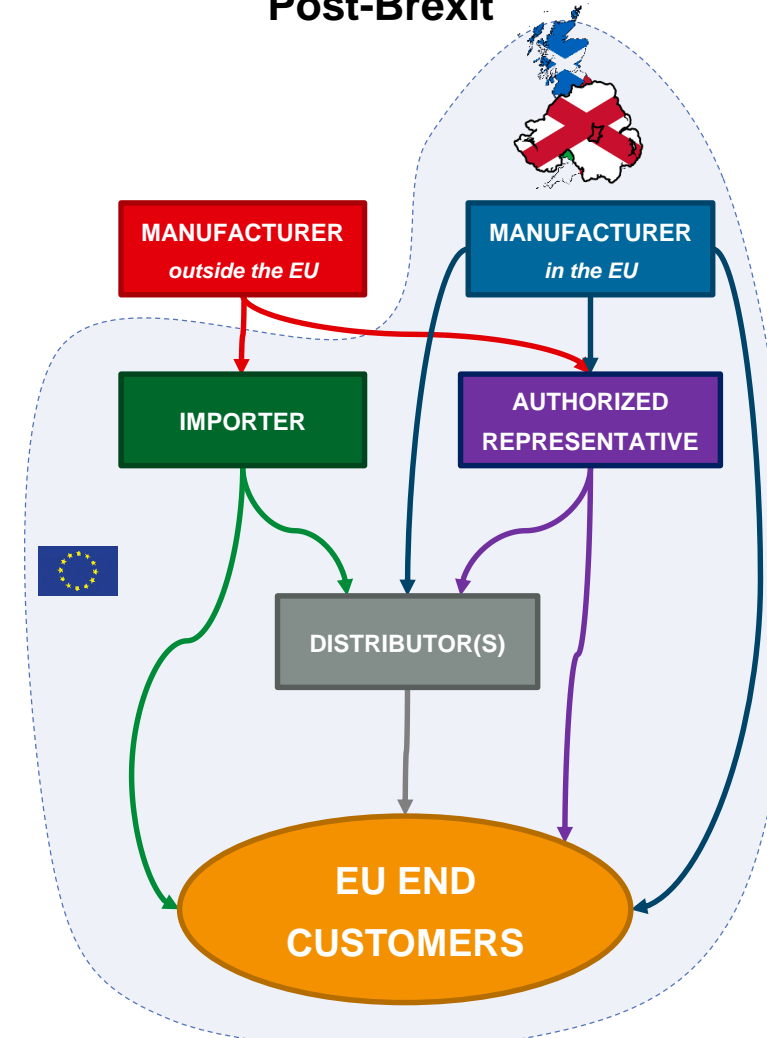
Economic Operators – GB Exporting to EU



Pre-Brexit



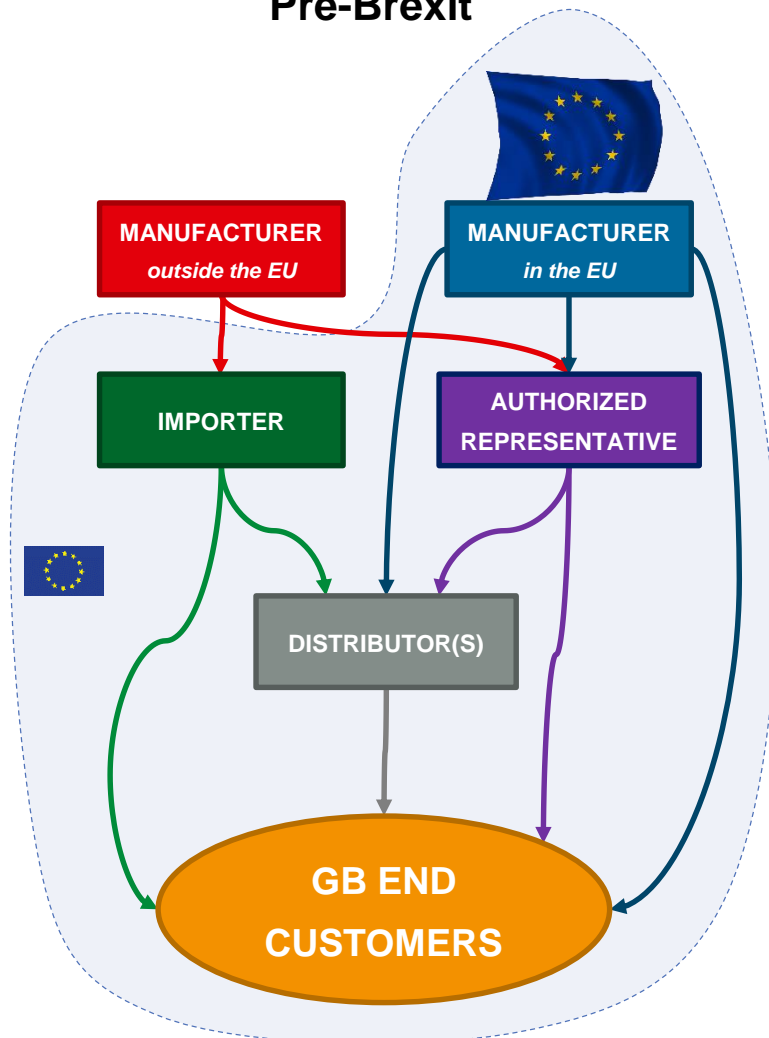
Post-Brexit



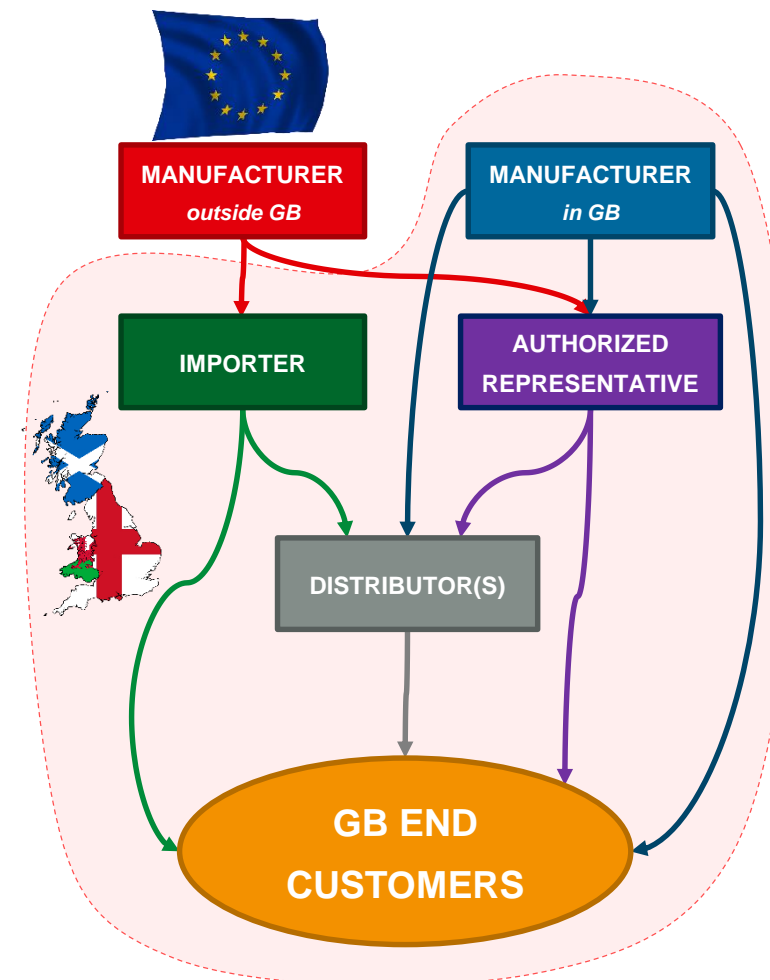
EEA (European Economic Area)


Economic Operators – EU Exporting to GB

Pre-Brexit



Post-Brexit



-  GB Area
-  EEA (European Economic Area)

Legal Implications

- **Legislation changes**

- UK no more compelled to follow EU laws locally



- **Local representative**

- As UK is outside EU, companies need local representatives on each country in order to trade



- **CE**

- Owned by EU
- Now UK cannot influence
- UKCA Creation





UKCA

UKCA



- **UK Conformity Assessed**
- Really similar to CE
 - Applicable from 2021
 - Inherited CE laws/standards
 - **Same technical requirements**
 - CE = EN 1 2 3 4 5
 - UKCA = BSEN 1 2 3 4 5
- **Nothing changes from an EMC/Electronics perspective... FOR NOW!**
 - In the future, GB Government can decide to depart from that = BIG CHALLENGES!
- Additional paperwork
 - Biggest change for customers
 - New Declarations of Conformity (DoC) “should” be made
 - Referencing UK laws (SI – Statutory Instruments)
 - Instead of EU Directives (from EUOJ)
 - More info: <https://www.gov.uk/guidance/using-the-ukca-marking>

UK
CA

EU DoC to UK DoC conversion



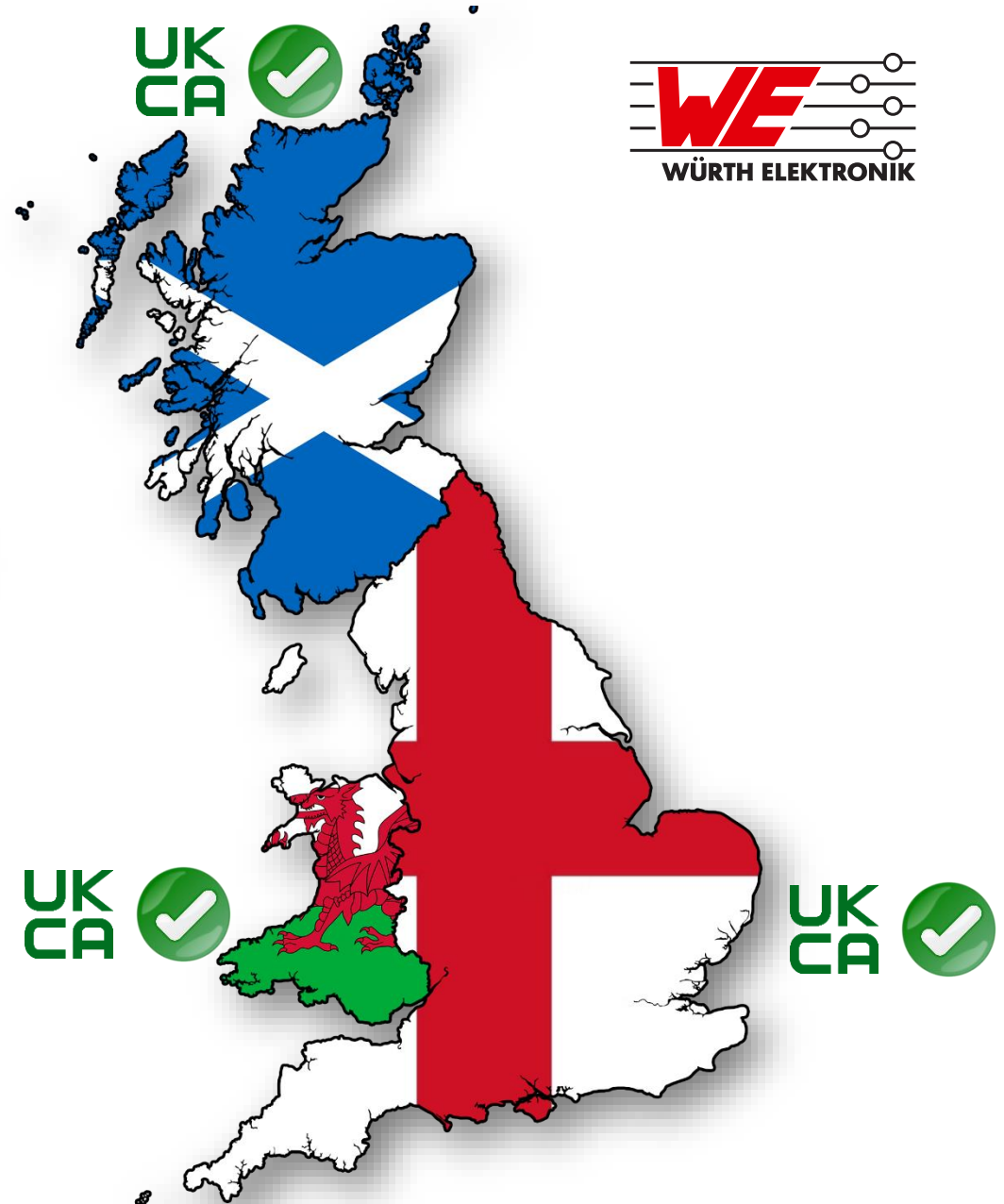
EU Directive	Directive Number		UK Regulation	Statutory Number
Restriction of the Use of certain Hazardous Substances in Electrical and Electronic Equipment (RoHS)	2011/65/EU		The Restriction of the Use of Certain Hazardous Substances in Electrical and Electronic Equipment Regulations 2012	2012 No. 3032
Radio equipment	2014/53/EU		Radio Equipment Regulations 2017	2017 No. 1206
Low Voltage Directive	2014/35/EU		Electrical Equipment (Safety) Regulations 2016	2016 No. 1101
Electromagnetic Compatibility	2014/30/EU		Electromagnetic Compatibility Regulations 2016	2016 No. 1091

- [EU to UK legislation conversion](#)

UKCA – Where is it valid and needed?

- Great Britain **only**

- England
- Scotland
- Wales



When Do I Need To Get UKCA?

- **2021: “Standstill Period”**
 - CE still valid in the UK up to 1st January 2023 (for commercial/industrial)
 - **Medical:** CE recognized until 30/06/2023
 - Products that didn't have CE marking will need to get UKCA straight off
- Products already “in the market”
 - A fully manufactured (individual) 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. This does not require physical transfer of the good.
 - These products will not need to be “removed” from the market to have the UKCA marking applied.





Harmonized Standards and Designated Standards

OJEU – Official Journal of the European Union



- Gazette of record
 - Notices
 - Tenders
 - Regulations
 - Directives
 - Decisions
 - Recommendations
 - Opinions
- <https://eur-lex.europa.eu/homepage.html>

		ISSN 1977-0677
Official Journal		L 81
of the European Union		
		
English edition	Legislation	Volume 64 9 March 2021
Contents	<i>II Non-legislative acts</i>	page
	REGULATIONS	
	* Council Regulation (EU) 2021/406 of 5 March 2021 amending Regulations (EU) 2021/91 and (EU) 2021/92 as regards certain provisional fishing opportunities for 2021 in Union waters and non-Union waters	1
	* Commission Delegated Regulation (EU) 2021/407 of 3 November 2020 amending Regulation (EU) No 528/2012 of the European Parliament and of the Council to include citric acid as an active substance in Annex I thereto ⁽¹⁾	15
	* Commission Regulation (EU) 2021/408 of 2 March 2021 establishing a fisheries closure for common sole in area 7a for vessels flying the flag of Belgium	18
	* Commission Regulation (EU) 2021/409 of 3 March 2021 establishing a fisheries closure for plaice in area 7a for vessels flying the flag of Belgium	21
	* Commission Regulation (EU) 2021/410 of 4 March 2021 establishing a fisheries closure for whiting in area 7a for vessels flying the flag of Belgium	24
	* Commission Regulation (EU) 2021/411 of 4 March 2021 establishing a fisheries closure for cod in area 7a for vessels flying the flag of Belgium	27
	* <u>Commission Implementing Regulation (EU) 2021/412 of 8 March 2021 amending Implementing Regulation (EU) 2017/962 as regards the review of the suspension of the</u>	30

EU Directives

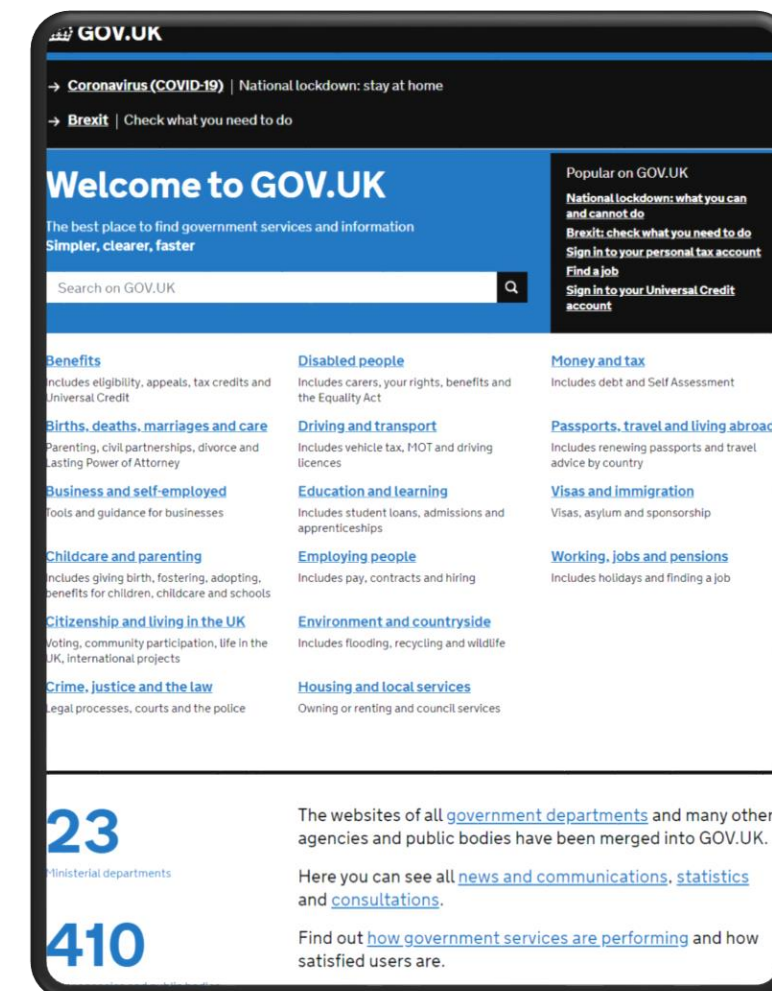
- Commonly seen directives on the Electronics Industry:
 - **EMC** (**E**lectromagnetic **C**ompatibility)
 - **LVD** (**L**ow **V**oltage **D**irective)
 - **RED** (**R**adio **E**quipment **D**irective)
 - **ATEX** (Appareils destinés à être utilisés en **A**tmosphères **E**xplosives)
 - **REACH** (**R**egistration, **E**valuation, **A**uthorisation and **R**estriction of **C**hemicals)
 - **RoHS** (**R**estriction of **H**azardous **S**ubstances)
- **All of these are EU directives!**
- And what about the UK (GB)?



GOV.UK



- This is the “equivalent” in the UK to the OJEU.
- www.gov.uk
- Unified portal with access to:
 - Benefits
 - Births, deaths, marriages and care
 - Business and self-employed
 - Childcare and parenting
 - Citizenship and living in the UK
 - Crime, justice and the law
 - Disabled people
 - Driving and transport
 - Education and learning
 - Employing people
 - Environment and countryside
 - Housing and local services
 - Money and tax
 - Passports, travel and living abroad
 - Visas and immigration
 - Working, jobs and pensions
 - How government works
 - Departments
 - Worldwide
 - Services
 - Guidance and regulation
 - News and communications
 - Research and statistics
 - Policy papers and consultations
 - Transparency and freedom of information releases
 - Publications
 - Business and Industry
- <https://www.gov.uk/business-and-industry>



Harmonized Standards



- Standards **recognized** by the **European Standard Organizations**

- **CEN** (*Comité Européen de Normalisation*)
- **CENELEC** (*Comité Européen de Normalisation Électrotechnique*)
- **ETSI** (**E**uropean **T**elecommunications **S**tandards **I**nstitute)



- Created by request of the European Commission



- Published on **OJEU** (Official Journal of the EU)

- Utilized by Economic Operators, Manufacturers and Conformities Assessment Bodies
 - To demonstrate that products or services comply with the relevant legislation

- More info: https://ec.europa.eu/growth/single-market/european-standards/harmonised-standards_en

Designated Standards



- “Designated Standard is a standard, developed by consensus, which is recognised by government in part or in full by publishing its reference on GOV.UK in a formal notice of publication”. – gov.uk
- UK (GB) has total autonomy defining its own standards.
- Harmonized Standards (from EU) became Designated Standards (in GB) from 01/01/2021.
 - No changes in regards to product compliance, for now.
- Change proposals will be published during 28 days for appreciation/challenge
 - In case of no objections, on day 29 the changes will become law
- Depending on the product, a Designated Standard can be:
 - Recognized standardising bodies
 - **BSI** (British Standards Institute)
 - **CEN**
 - **CENELEC**
 - **ETSI**
 - Or from international standardising bodies
 - **ISO** (International Organization for Standardization)
 - **IEC** (International Electrotechnical Commission)
 - **ITU** (International Telecommunication Union)
- More details and list of directives: <https://www.gov.uk/guidance/designated-standards>



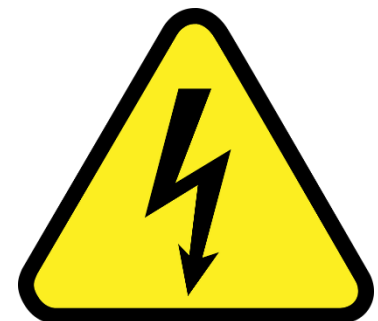
Designated Standards



- **Radio Equipment:** <https://www.gov.uk/government/publications/designated-standards-radio-equipment>
 - For any device that has wireless communication
 - WPT included

- **EMC:** <https://www.gov.uk/government/publications/designated-standards-emc>
 - Electromagnetic Compatibility
 - Applied to basically all electric/electronic devices

- **Low Voltage:** <https://www.gov.uk/government/publications/designated-standards-low-voltage>
 - Devices with input or output voltages between $50V_{AC}$ and $1000V_{AC}$ or $75V_{DC}$ and $1500V_{DC}$
 - Household appliances, PSUs, LASER, cables, etc.





UKNI

UKNI



- For products placed on the Northern Ireland market
- Has to go along CE
 - Cannot go on its own
- CE is also still valid for the NI market
- **Unfettered access:**
 - **NI businesses can use their “local” markings (CE or CE + UKNI) to place goods on the rest of the UK (Great Britain)**
- More info:
 - <https://www.gov.uk/guidance/moving-qualifying-goods-from-northern-ireland-to-the-rest-of-the-uk>

UK
NI



Guidance

Additional Costs?



- Self-Certification
 - Very low additional costs
 - Basically generation of additional documentation
- Conformity Assessment/Notified Bodies
 - For certain devices (some medical, some RF-based and other specific ones)
 - Potentially double the cost
 - Alternative: Certification Labs that have branches in both GB and EU.



Markings/Compliance: What do I do?

From ↓ To ↘	EU	GB	NI
EU	CE	UKCA	CE or CE+UKNI
GB	CE	UKCA	CE or CE+UKNI
NI	CE	UKCA*	CE or CE+UKNI



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

Thank You!

