



Feedback from British Marine on UKCA marking clarifications after engagement with the Department for Business and Trade (DBT)

A CE marked product (watercraft, Annex II component) can be placed upon the GB market (note that Northern Ireland is still in the EU for product safety, i.e. CE marking is still required) with an RCD DoC, referencing EU Harmonised Standards, and with an EU Notified Body verification, with documentation in English.

There is still a trade line between the EU and GB and as such all economic operators bringing products into GB are considered as importers and as such must meet the applicable responsibilities. Currently legislation for this is in place until 31st Dec 2024.

A product can be UKCA marked for GB product placement, to achieve UKCA marking (if chosen to be applied by the manufacturer) there are two different routes.

- 1) Traditional certification procedure **using an UK Approved body** (where required) and UK Designated Standards for presumption of conformity, with a UKCA DoC.
- 2) Certification procedure **using the EU type certificate** in place of using UK Approved Body, EU type certificate accepts EU Harmonised Standards for presumption of conformity, leading to a UKCA DoC (which will show the EU Harmonised Standards on the second page, not the UK Designated standards.)

For example: a CE DoC is required for CE mark product placement and a UKCA DoC is required for UKCA mark product placement. It's not possible to mix and match, you **can't** use EU Harmonised Standards with an UK Approved Body to achieve UKCA and then mark with CE..... etc.

Until 11pm on **31 December 2027**, the UKCA marking can be placed on a label affixed to the product or on a document accompanying the product. Find out more about using the UKCA marking - <https://www.gov.uk/guidance/using-the-ukca-marking>

DBT have advised to having separate DoC's if dual certification is used, in order to limit the risk of non-compliance and confusion regarding applicable presumption of conformity as there are gaps between harmonisation and designation of standards.

Note, there is a plan to extend CE acceptance indefinitely past December 2024, but this has not been signed off by the UK Parliament yet (this is a proposed law, not one currently in place.)