



**BREXIT MAKES ITS MARK ON PRODUCTS:  
A HIGH-LEVEL GUIDE TO PRODUCT MARKINGS IN THE UK FROM 1 JANUARY 2021**

**EU HARMONISED GOODS CURRENTLY REQUIRING CE MARKING**

WHERE DO YOU WANT TO PLACE YOUR GOODS?	WHAT IS THE RELEVANT TIMEFRAME?	WHAT ARE THE RELEVANT CONDITIONS?	WHAT MARK MUST BE USED? <small>(N.B. PRODUCT MUST BE COMPLIANT WITH ASSOCIATED REGIME)</small>	ARE THERE ANY EXCEPTIONS?
Great Britain	From 01.01.2021	<ul style="list-style-type: none"> <li>Goods require CE marking; and</li> <li>Mandatory third party conformity assessment required and carried out by UK body</li> </ul>	<b>UK CA</b>	Not applicable to existing stock if: <ul style="list-style-type: none"> <li>Fully manufactured; and</li> <li>CE marked; and</li> <li>Ready to go on the market before 01.01.2021.</li> </ul> From 01.01.2022 - applicable to aerosol products previously requiring 'reverse epsilon' marking: <b>3</b>
Great Britain	From 01.01.2021 until 31.12.2022 <small>(CE no longer recognised after this date)</small>	<ul style="list-style-type: none"> <li>Marking required on basis of self-declaration; and</li> <li>Any mandatory third party conformity assessment carried out by EU body; and</li> <li>Certificate of conformity transferred to EU body prior to 01.01.21.</li> </ul>	<b>CE</b> or <b>CE</b> and <b>UK CA</b>	CE Marked goods can only be placed on the GB market during this time while GB and EU product requirements remain the same.
Great Britain	From 01.01.2023 until 31.12.2023	<ul style="list-style-type: none"> <li>Goods require CE marking; and</li> <li>Mandatory third party conformity assessment required and carried out by UK body.</li> </ul>	<b>UK CA</b>  <i>on product label or accompanying document (transitional provisions)</i>	Not applicable to construction products, medical devices, interoperability of the rail system and transportable pressure equipment.
Great Britain	From 01.01.2024	<ul style="list-style-type: none"> <li>Goods require CE marking; and</li> <li>Mandatory third party conformity assessment required and carried out by UK body.</li> </ul>	<b>UK CA</b>  <i>must now be permanently affixed to product</i>	
Northern Ireland	From 01.01.2021	<ul style="list-style-type: none"> <li>Compliance with EU rules; and</li> <li>Mandatory conformity assessment required and carried out by UK body.</li> </ul>	<b>CE</b> and <b>UK NI</b>  <i>(UKNI cannot be used alone)</i>	
Great Britain (goods originating from Northern Ireland)	From 01.01.2021	<ul style="list-style-type: none"> <li>Goods must be qualifying Northern Ireland goods under unfettered access; and</li> <li>Compliance with EU rules; and</li> <li>Mandatory conformity assessment required and carried out by UK body (if to use UKNI).</li> </ul>	<b>CE</b> or <b>CE</b> and <b>UK NI</b>	
EU	From 01.01.2021	<ul style="list-style-type: none"> <li>Compliance with EU rules; and</li> <li>Conformity assessment carried out by EU body.</li> </ul>	<b>CE</b> or <b>CE</b> and <b>UK CA</b>  <i>(UKNI is not recognised in the EU and can never be used)</i>	

**OTHER EXCLUSIONS**

**OLD APPROACH GOODS - SUBJECT TO SEPARATE REGIMES:**

- Chemicals;
- Medicines;
- Veterinary Medicines;
- Vehicles; and
- Aerospace (re Great Britain only)

**GOODS SUBJECT TO SECTOR SPECIFIC RULES:**

- Medical devices
- Rail interoperability constituents
- Construction products
- Civil explosives
- Products requiring eco-design and energy labelling
- Cosmetics
- Tobacco products
- Fertilisers

**NON-HARMONISED GOODS**

- if not subject to CE or UKCA marks must comply with UK national product safety legislation + (re Northern Ireland only) Northern Ireland specific rules.