

Brexit hvad nu! og særligt hvornår ?



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Hvad er Brexit og hvornår startede det?

Den 29. marts 2017 meddelte Storbritannien officielt, at Storbritannien ønsker at forlade **EU**. Erklæringen til **EU** blev indgivet under artikel 50 i traktaten om Den Europæiske Union. Den proces giver som udgangspunkt to år til at gennemføre Storbritanniens udtrædelse.



Brexit krav - geografi

What marking applies?



**UK
NI** CE / CE

For the Northern Ireland market, the CE marking continues to be used for self assessed goods and those goods which are conformity assessed by an EU notified body.

The UKNI plus CE mark is used for goods which are conformity assessed by a UK approved body.

The United Kingdom of Great Britain and Northern Ireland



Northern
Ireland

Great
Britain

**UK
CA**

The UKCA mark will mandatory in Great Britain for goods placed on the market for the first time on and after 1 Jan 2023.

It applies to goods which used the CE and reverse epsilon markings.

Brexit krav i overskrifter 1

Hvis du sælger produkter der skal CE-mærkes i Storbritannien i dag, skal du være opmærksom på:

- Fra x/x 20xx kan CE-mærket ikke bruges som bevis for overensstemmelse, i stedet skal man bruge UKCA mærkning.
- Der er en overgangsperiode indtil x/x-20xx hvor UKCA mærket ikke behøver at være på produktet, men kan være på medfølgende dokumentation.
- Der skal udfærdiges en UKCA "declaration of conformity" med referencer til GB lovgivning. Der skal henvises til "designated standards" – svarende til harmoniserede standarder i EU



Brexit krav i overskrifter 2

Hvis dit produkt er omfattet af en lovpligtig 3. parts godkendelse, skal produktet godkendes af en "Conformity Assessment Bodies (CABs)" i Storbritanien.

Hvis dit produkt har en 3. parts godkendelse fra en "Conformity Assessment Bodies (CABs)" i GB, kan produktet ikke sælges i EU før det er godkendt af en NoBo i EU.

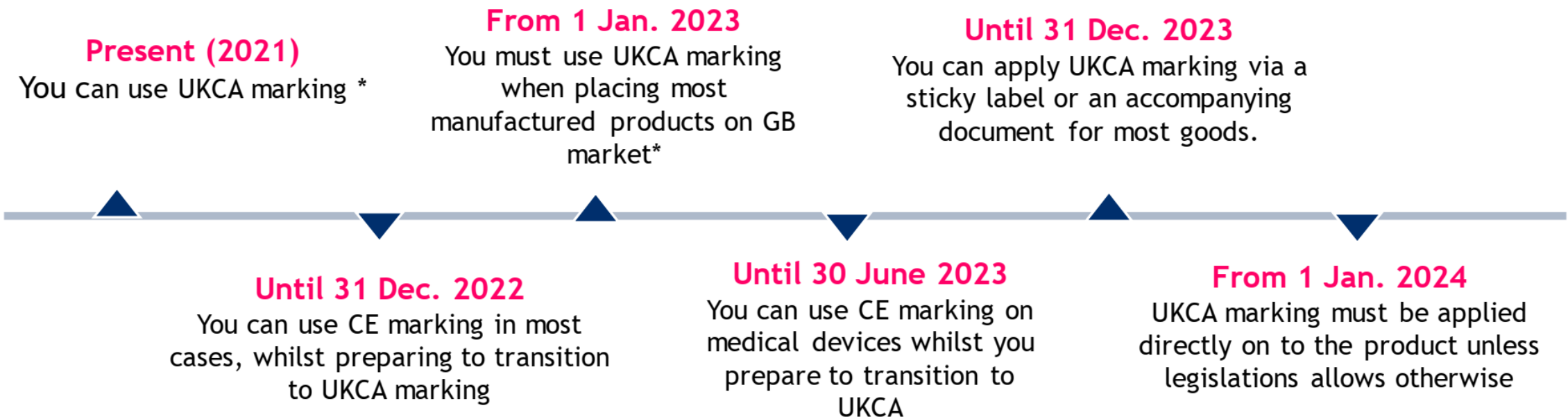
Fra x/x-20xx skal der være en GB firmaadresse på produktet.



Brexit krav – tidslinie 1



Timeline to implement UKCA Marking



Brexit krav – tidslinie 2

Timeline to Implement UKCA Marking

**UK
CA**

Present (2021)
You can use UKCA marking *

After 31 Dec. 2022
You must use UKCA marking
when placing most
manufactured products on GB
market*

After 31 Dec. 2025
UKCA marking and importer details
must be applied directly on to the
product unless legislations allows
otherwise

Until 31 Dec. 2022
You can use CE marking in most
cases, whilst preparing to transition
to UKCA marking

Until 31 Dec. 2025
You can apply UKCA marking and
importer details via a sticky label or an
accompanying document for most
goods.

Brexit krav – tidslinie ???

UK
CA

New Measures



Allowing the **UKCA marking and importer details** for goods from EEA countries, to be placed on the product via a sticky label or on an accompanying document until 31 December 2025.



Continuing to accept spares onto the GB market to **repair, replace and maintain** products.



Making clear that there is no need to re-test and re-mark **existing imported stock** brought into the UK before 31 December 2022.



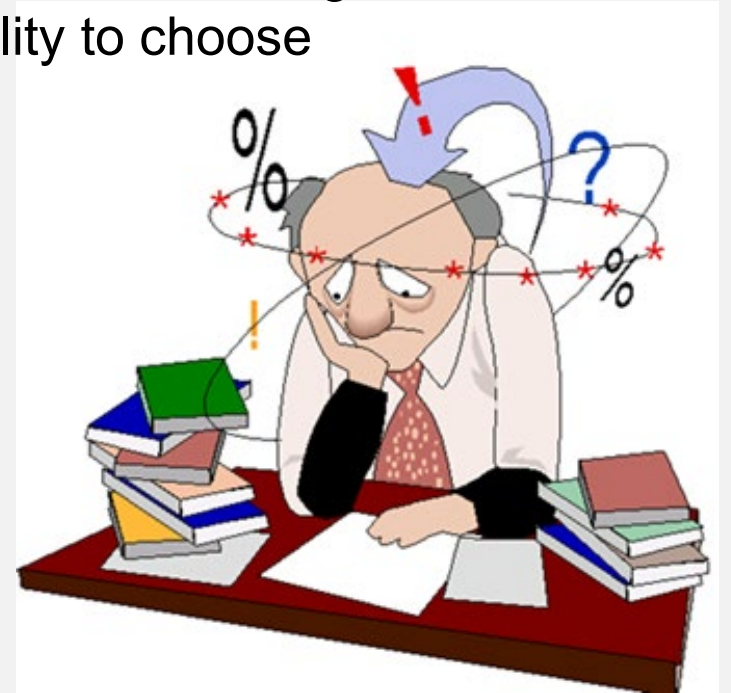
Reducing re-testing costs, by allowing certificates provided by non-UK conformity assessment bodies (CABs) testing to EU requirements, issued before the end of this year to be used as a basis for UKCA marking certification.

Businesses to be given UK product marking flexibility

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Businesses given 2 additional years to apply new product safety marking.

The government will continue to recognise the CE marking for 2 years, therefore allowing businesses until 31 December 2024 to prepare for the UKCA marking. Businesses can also use the UKCA marking, giving them flexibility to choose which marking to apply.



Brexit krav – hvad er dækket?

What is covered by the UKCA marking

**UK
CA**

- ✓ Toy safety
- ✓ Pyrotechnics
- ✓ Recreational craft and personal watercraft
- ✓ Simple pressure vessels
- ✓ Electromagnetic compatibility
- ✓ Non-automatic weighing instruments
- ✓ Measuring instruments
- ✓ Lifts
- ✓ ATEX
- ✓ Radio equipment
- ✓ Pressure equipment
- ✓ Personal protective equipment
- ✓ Gas appliances
- ✓ Machinery
- ✓ Equipment for use outdoors
- ✓ Eco-design
- ✓ Aerosols
- ✓ Low voltage electrical equipment
- ✓ Restriction of hazardous substances

Products covered by the UKCA marking but have some special rules

- Medical devices
- Rail products
- Construction products
- Cableways
- Transportable pressure equipment
- Unmanned aircraft systems
- Marine equipment

Brexit krav – hvor finder jeg det!



Finding and understanding regulations



To understand the route to conformity assessment for your goods as well as other specific requirements will need to check industry guidance.

Guidance is available on GOV.UK in an A-Z of industry guidance from the Office for Product Safety and Standards.

GOV.UK has sets of regulations for each product type for the GB market and for NI market.

Product regulations note whether you can self-declare for your good, how to place the marking and any specific requirements



Brexit krav – hvor finder vi det

På denne side vil der senere blive listet en række hjemmesider med interessante artikler mm. angående Brexit

