



UKCA, UKNI, CE, and the UK RER

Michael Derby – Element – 16 March 2023

Welcome



MICHAEL DERBY

Technical Director

M: +44 (0)7435 930 187

O: +44 (0)2035 401 820

Michael.Derby@element.com

MIC MRA Agenda

Explanation of UK, GB, EU, NI

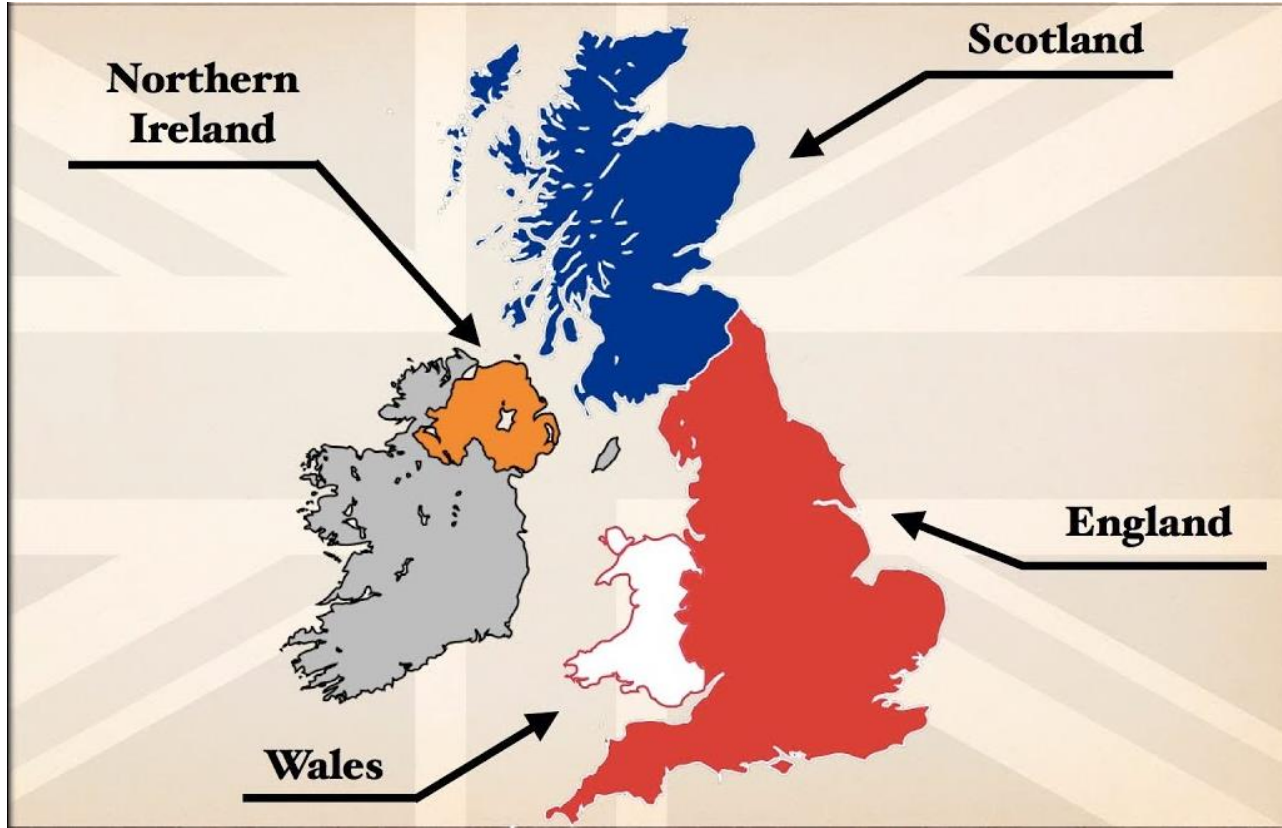
Regulatory Approvals for UK, GB, NI

Contrast to the EU RED

Use of CE mark for Britain “easements”

Q&A

Which Countries are Involved



What is the UK, Great Britain, Ireland



Compliance Marks for UK, GB, NI



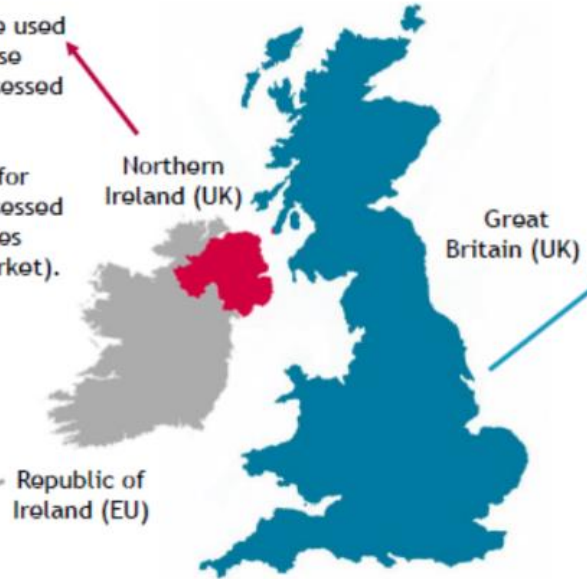
CE
OR
CE UK NI

Northern Ireland (UK)
The CE marking continues to be used for self-assessed goods and those goods which are conformity assessed by an EU Notified Body.

The CE plus UKNI mark is used for goods which are conformity assessed by a UK Notified Body (UK bodies retain this status for the NI market).

CE

Rep. Ireland and rest of the European Union
In the Republic of Ireland and the wider European Union the CE mark (or reverse epsilon marking where required) continues to be used.



UK CA

Great Britain (UK)
The UKCA mark will be mandatory in Great Britain for goods placed on the market for the first time on and after 1 Jan 2025

It also replaces the reverse epsilon marking for goods placed on the market in Great Britain.

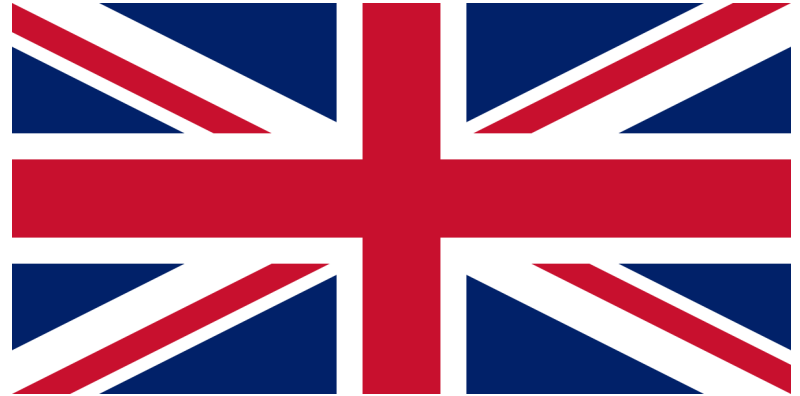
Radio Equipment Regulation

- UK Radio Equipment Regulation
 - UKCA mark
- Applies for Great Britain (GB)
 - From 1 January 2021
- NI uses CE mark (for EU)
 - or UKNI and CE marks if equipment is only for NI and a UK Approved Body was used

**UK
CA**

When does UK RER apply to a product?

- Radio Communication and Radio Determination
 - Same scope as the RED
- May be different radio spectrum
 - Don't assume

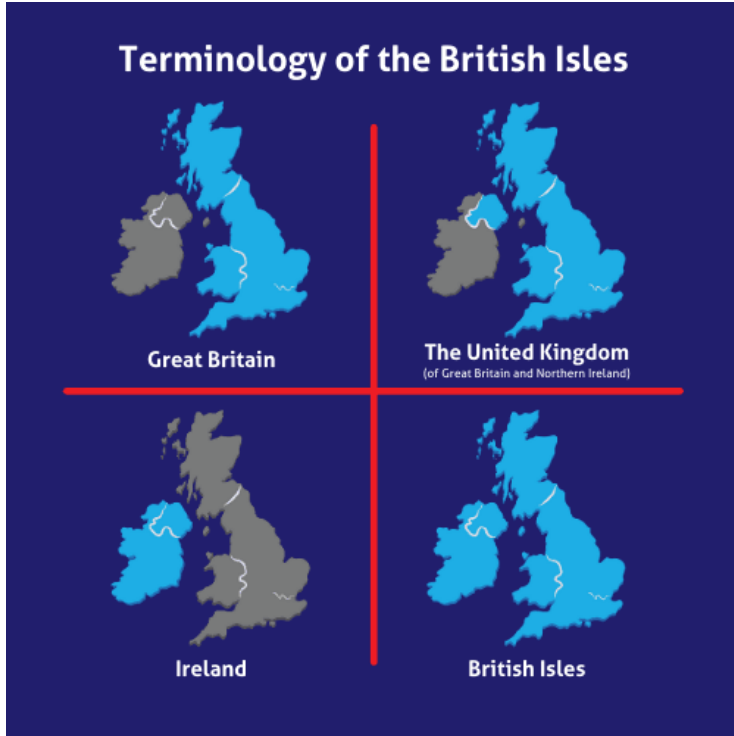


Assessment Requirements

- Essential requirements
 - Section 6(1a): Safety
 - Section 6(1b): EMC
 - Section 6(2): Radio
- DoC when placed on the market
 - Applicable per unit, like EU RED
- Based on Designated Standards
 - <https://www.gov.uk/government/publications/designated-standards-radio-equipment>



Which Compliance Marks?



- **Great Britain**
 - UKCA mark (not in EU)
- **Ireland**
 - CE mark (EU)
- **The UK and NI**
 - UKCA and CE marks
 - (Maybe UKNI)
- **Whole of British Isles**
(UK and Ireland)
 - UKCA and CE marks

RER DoC

1

**One DoC applies
to the final product**

All aspects of a device
are covered by one DoC,
tested separately

X

There is no
“Certification”

Approved Body TEC
RER Section 6(2)

RER Assessment Scope

Product Safety

**EMC
Performance**

**Radio
Performance**

RER Compliance

Do I need to **test it**?

As with RED CE

Does not mandate testing
...but most do test to standards

Safety, EMC, Radio

Choice of test lab

Can be same testing as EU CE
in most cases

UKCA for UK RER Compliance Planning

Will I need a UK
Approved Body TEC?

Yes, UK or UK MRA Partner

Labelling and
documentation?

EU Notified Body cannot issue UK TEC

How can I control
compliance going
forward?

UKCA mark and GB contact information

UK based importer details with product

Track changes, sample and quality control

Two regions and lists of standards now!

UK RER Technical Documentation

Manufacturer's Technical Documentation



Describe product and compliance

Keep for 10 years

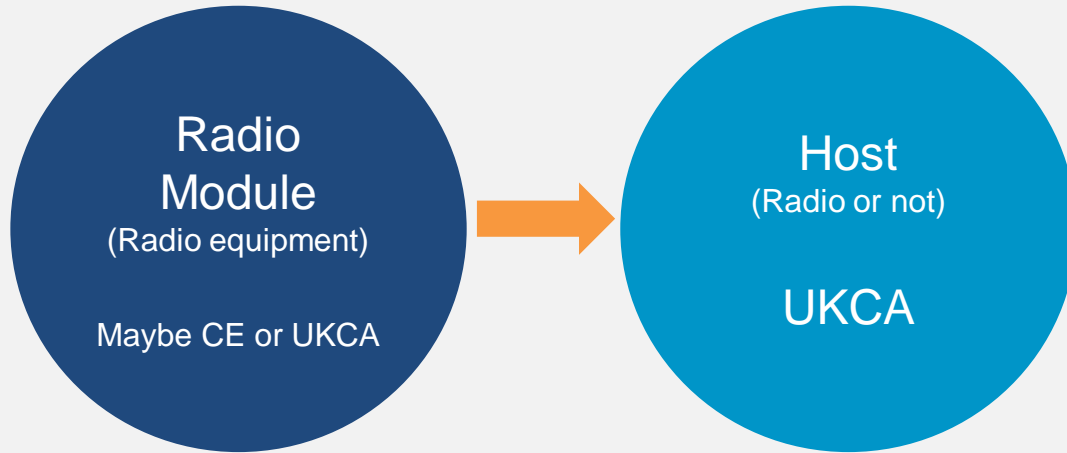
For manufacturer's records

For MSA

For Approved Body

UK RER Radio Modules

Module and Host separate



Module in the Host



Changes

When something changes

Re-Assess

Re-assess
based on
changes

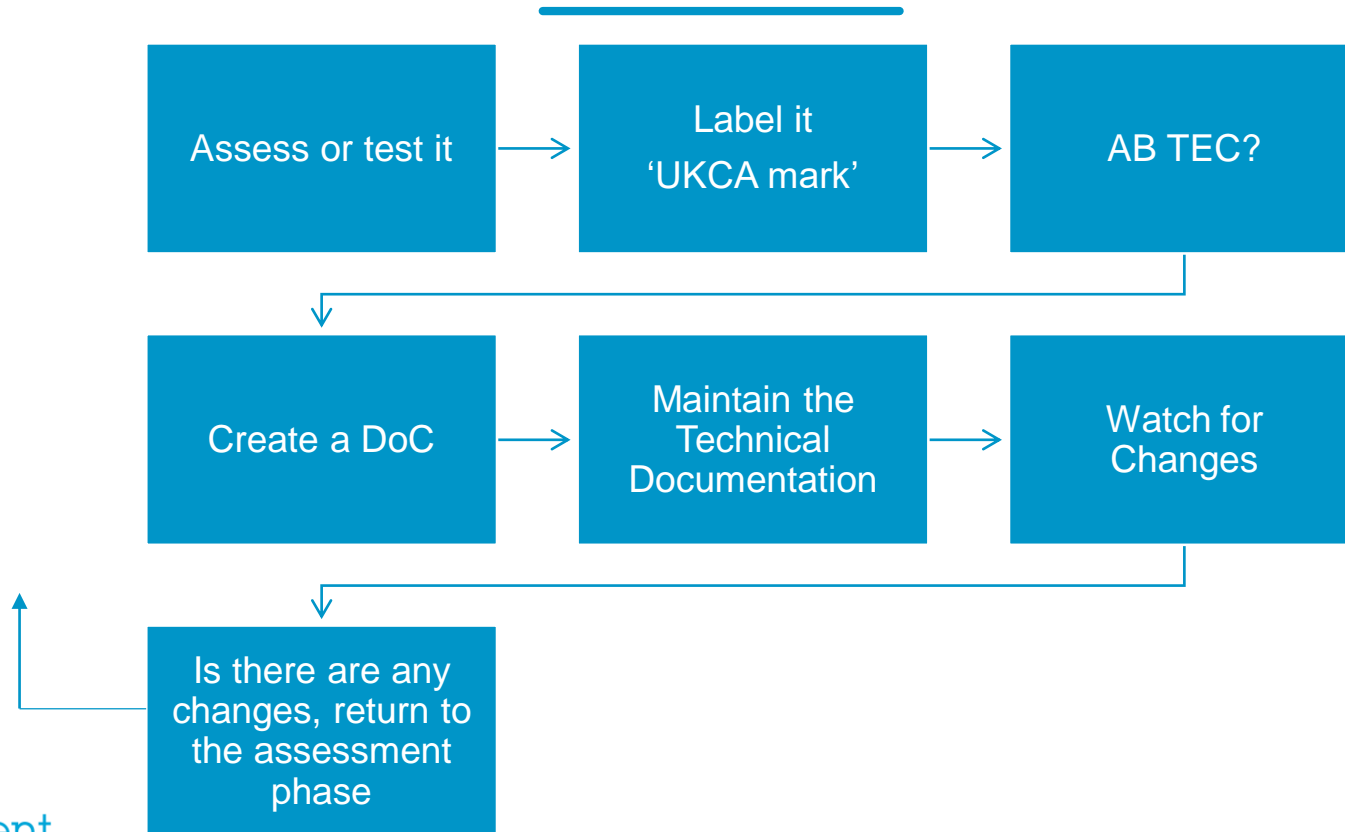
Full Re-Test?

Only assess
things that
change

Update documents

TD, DoC
AB TEC

RER Compliance Process



EU and Great Britain Comparison



UK RER vs EU RED – Assessment

**Product
Safety**

**EMC
Performance**

**Radio
Performance**

May differ

**Other
Categories**

**Not on the
UK DoC**

UK RER vs EU RED – Assessment

Assessment

EU Harmonised Standards
UK Designated Standards

EU Notified Body
UK Approved Body

Article 3.3(g) for phones

Future deviations
RED Articles 3.3(d), (e), (f)
RED Article 3.4
EU CRA and UK Cyber

UK RER vs EU RED – Labelling

Labelling and
Documents

CE mark

UKCA mark

(UKNI CE mark possible)

EU DoC

UK DoC

EU Importer details

UK Importer details

...both, can be on packaging

UK RER vs EU RED – Tracking

Tracking Changes
for the life of
placing products
on the market

Two sets of regulations to track

Two regions of spectrum planning

Two lists of standards

CE or UKCA?



CE

OR

**UK
CA**

Now to the temporary “easements”?

What can we do, right now?

Temporary Allowances

Easements
to access
GB market

- CE marked radio equipment permitted into Great Britain
 - CE mark accepted until 31 December 2024
 - If product is permitted in the GB market
 - If no difference in technical requirements
- UKCA mark for Great Britain from 1 January 2025
 - (Two-year extension from previous easement)
 - Unless they extend it again!
- Other Regulations have different dates
 - (Medical equipment, until 30 June 2024)
 - My focus today is on radio equipment

Temporary Allowances

Easements
to access
GB market

- UKCA mark and importer details
 - On temporary label or accompanying document
 - Accompanying document with the UKCA mark must remain with the product
 - Such as the user manual
 - Not just the packaging, which is thrown away
 - Applies to Radio Equipment from all countries
 - “New for EEA countries” confusion
- Until 31 December 2027
 - Permanent labelling from 1 January 2028

Temporary Allowances

Easements
to access
GB market

- UKCA marking based on EU Notified Body EU-TEC
 - If the EU-TEC was issued before 31 December 2024
 - EU-TEC may be used until 31 December 2027, or until expiry of EU-TEC
- UK Approved Body TEC from 1 January 2028
- EU-TEC re-issued or expired after 31 December 2024, UK Approved Body TEC is needed, even before 1 January 2028
 - e.g. Change in standards or equipment

Temporary Allowances

Easements
to access
GB market

- Spare parts for replace or repair into Great Britain
 - Can be sent to Britain
 - To repair CE marked equipment, in UKCA world
- Documentation needed to justify it

Compliance and Label in Great Britain

Great Britain	2023	2024	2025	2026	2027
	Yes (CE accepted)	Yes (CE accepted)	No	No	No
	Yes (transitional marking)*	Yes (transitional marking)*	Yes (transitional marking)*	Yes (transitional marking)*	Yes (transitional marking)*

*** Until 1 January 2028**

UKCA mark and importer details
can be on paperwork or temporary label

Questions



WE MAKE
CERTAIN

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