

Conformity Marking – how-to guidance

Introduction

Any products covered by a British standard with Designated status are mandated by the EU construction products regulation (CPR) and subsequent UK amendments to carry conformity marking and a declaration of performance (DOP) in order to be placed on the market.

The 2020 UK amendment to the CPR states:

4.— (1) A person who supplies a construction product in respect of Great Britain that is covered by a designated standard or conforms to a UK Technical Assessment that has been issued for it shall be guilty of an offence unless:

*(a) there is supplied with the product in accordance with Article 7 of the 2011 Regulation a declaration of performance for the product drawn up in accordance with Articles 4 and 6 of the 2011 Regulation; and
(b) the product has affixed to it the UK marking in accordance with Article 8(1) of the 2011 Regulation.*

Annex Z of any designated standard covers in detail all the requirements and methods for conformity marking, the associated AVCP systems and declarations of performance.

UKCA, UKNI and CE Marking

UK Government intends to end recognition of the CE mark by 1 January 2023 (the end of the transitional period). This means it will not be legal to place a CE Marked Product on the market in Great Britain (England, Scotland and Wales) with certain exceptions and simplifications detailed by government in June. The situation is distinct in Northern Ireland due to the Northern Ireland protocol.

The table below shows what conformity marking is and will be accepted between the UK, Northern Ireland and European Union member states.

		Manufacture in Great Britain * Assessed by UK Body	Manufacture in Northern Ireland * Assessed by UK Body	Manufacture in European Union ** Assessed by EU Body
Place on Market in Great Britain	Until 31/12/2022	UK CA or CE	UK CA or CE	UK CA or CE
	After 01/01/2023	UK CA	UK CA	UK CA
Place on Market in Northern Ireland		* CE and UK NI	* CE and UK NI	** CE
Place on Market in European Union		CE	CE	CE

NOTE: UK bodies are able to apply the CE marking only where it is accompanied by the UKNI marking, UK bodies are not recognised as competent to apply the CE marking alone.

Marking is usually applied either directly to products, but where this is not possible, it can instead be applied to labelling or packaging.

Declaration of Performance

A declaration of performance is document with specific utility that details compliance, or levels of performance against the required essential characteristics, and is used for record keeping. It should be provided as part of an O&M manual but should be available to view in advance for any product that has been placed on the market.

A comprehensive example of a declaration of performance and the necessary information is found on page 4 of the European Commission: CE marking step by step guide (see references).

AVCP Systems

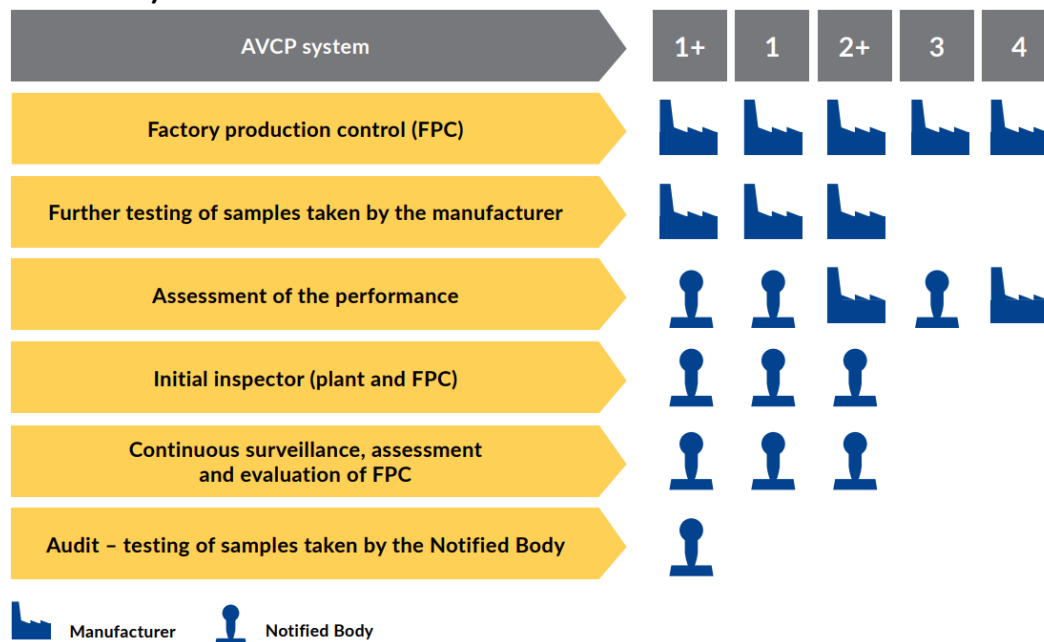
Depending on the intended uses of kits or components, the assessment and verification of constancy of performance (AVCP) system that needs to be used to declare the levels of performance of characteristics will vary.

The AVCP system dictates the level of involvement from a 3rd party approved body in assessing the following main elements:

- Factory production control (fpc) on the basis of documented, permanent and internal control of production in a factory, in accordance with the relevant harmonised technical specifications.
- Initial inspection of the manufacturing plant and of fpc.
- Continuous surveillance, assessment and evaluation of fpc.
- Determination of product type on the basis of type testing, type calculation, tabulated values or descriptive documentation of the product.
- Audit testing of samples taken before placing the product on the market.

The table below is a non-product specific overview of how responsibilities are split between the manufacturer and approved body for each AVCP System.

AVCP systems overview extracted from European Commission: CE marking step by step (see references).



Terminology Changes

A number of terms used in this guide are different from those used previously in the EU and are summarised below.

CE Marking (EU)	UKCA Marking
Construction Products Regulation (CPR)	UK Construction Products Regulation) UK CPR
Notified Body (NB)	UK Approved Body (AB or CAB)
Harmonised Standard	Designated Standard
Technical Assessment Body (TAB)	UK Technical Assessment Body (UK TAB)
European Technical Assessment (ETA)	UK Technical Assessment (UKTA)
AVCP Levels (No Change)	

References/Links

[FIS Brexit Risk Register](#)

[EU Construction Products Regulation](#)

[GOV.UK Construction Products Regulation \(Amendments to EU CPR\)](#)

[GOV.UK Register of UK Approved Bodies](#)

[GOV.UK Simplification of Product Safety Markings](#)

[Construction Products Association Guidance Note Construction Products Regulation \(CPR\)](#)

[European Commission: CE Marking Step by Step](#)