

Updates for Legal Metrology Webinar 26th February 2024

Introduction



- Recent Guidance on the use of the UKCA mark and the CE mark.
- New laws to introduce digital labelling for business and reduce costs.
- UK Carbon Border Adjustment Mechanism (UK-CBAM).
- Updates from Europe.



- Government still has the intention to extend indefinitely the use of the CE mark to demonstrate conformity assessment.
- Guidance issued on the 24th January but, significantly, we do not have the legislation.
- There is a web-page —"Using the UKCA mark".
- A more detailed document "Placing products on the market in Great Britain using UK or EU product".





- It appears that there is an intention to have two parallel systems.
- The UKCA system will be what is being called a "fast track provision".
- The manufacturer will need to draw up a UK Declaration of Conformity and affix a UKCA marking (in the permissible manner).
- The significant point is the UKCA mark can be applied after an instrument has been conformity assessed by an EU recognised conformity assessment body.



- What does this mean?
- You can continue to use the EU type examinations and the EU module D certificate for initially placing instruments on the market in the GB (Not the UK).
- The instrument can be 'stickered' with the UKCA mark.
- Can go on packaging or accompany documentation...
- Must be visible, legible and indelible.
- Each individual product will not need an accompanying document if moving through the supply chain as a batch.
- As soon as they batch is broken up- each new batch will need a UKCA mark.





- What does this mean?
- Alternatively, you can continue to use the CE mark.
- This will involve EU notified bodies and EU module D.
- This will be the status quo that existed before the departure from the EU.
- No need to use the "fast track" system for the UKCA mark.
- If you are importing the instrument, you must have the name and address of the importer.
- Must have a UK approved body for the purpose of re-qualification.
- This is obligatory if you wish to apply the crown mark after alteration, adjustment, addition repair or replacement.
- This does not apply to medical devices.





New laws to introduce digital labelling for businesses and reduce regulation costs



- Digital labelling will allow businesses to put important regulatory or manufacturing information online, rather than requiring them to physically print it on their products.
- The only available extra information can be found in the Product Safety Review-Consultation.
- Information can be available digitally via a screen rather than accompanying the instrument it will be limited to devices with integrated screen so not online.
- Not permitting to only have a QR Code.
- Not permitting high risk products with a screen to be able to rely on e-labelling.
- For any information required by product safety legislation (which is not a UKCA marking or manufacturers or importer details) the inscriptions must be marked

New laws to introduce digital labelling for businesses and reduce regulation costs

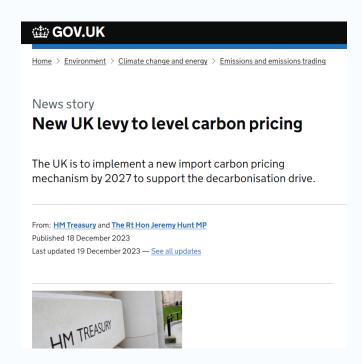


- Likely to have very little consequence.
- If you are to use a UKCA mark, it would be cheaper and quicker to apply a UKCA sticker than alter the indicator.
- This would inevitably mean altering the software of the instrument and possibly a new type-examination.
- Presumption that manufacturers and importers will continue to use the CE mark so these potential changes will have no influence.

UK Carbon Border Adjustment Mechanism (UK-CBAM)



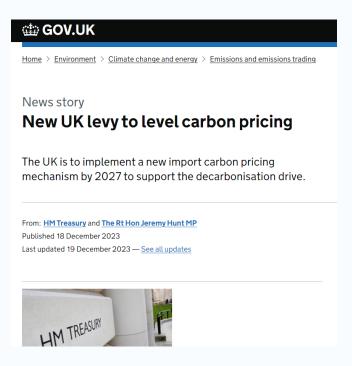
- This is part of the UK's strategy to minimise carbon leakage.
- It follows the implementation of such a mechanism in the EU in October 2026, which is threatening UK firms with an uneven playing field if there is no similar scheme in the UK.
- From 1 January 2026 as well as data reporting, the EU CBAM will impose an actual compliance cost on carbon-intensive imports into the EU from 1 January 2026.
- This will be very significant for businesses exporting iron and steel products to the EU.



UK Carbon Border Adjustment Mechanism (UK-CBAM)



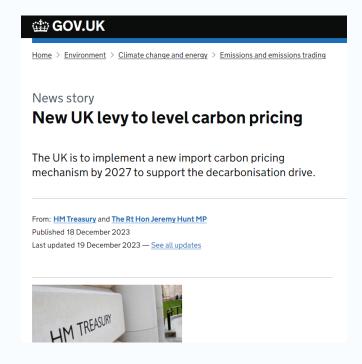
- The proposal is to apply a "carbon price" to imported goods for imported aluminium, iron and steel.
- Will apply directly to the importer of imported products within the scope of UK-CBAM.
- Appears it will apply to "Comprehensive coverage of iron and steel products (except for some ferro-alloys, scrap etc) and articles such as screws, bolts, nuts, coach screws, washers and similar articles.
- As the UK-CBAM is reciprocal with the EU likely to have limited financial costs.
- Will have a cost if outside of the EU.
- Will have a bureaucratic cost.



UK Carbon Border Adjustment Mechanism (UK-CBAM)



- Further guidance
- https://taxation-customs.ec.europa.eu/carbon-borderadjustment-mechanism en#resources
- https://customstaxation.learning.europa.eu/course/view.php?id=786§ion =1



Other updates for the Industry



- Review of the NAWI Directive and the Measuring Instruments Directive is taking place
- This may eventually feed into the GB legislation
- Looking to ensure some of the technical advances and AI are beginning to be incorporated into this-UKWF is taking an important role.
- Review of the R76 is taking place.
- Will eventually have an influence on the GB standards

