



9 March 2021

## Dual labelling of reversed epsilon and UKCA marks Briefing paper

### Introduction

The United Kingdom is no more an EU Member State.

The Great Britain<sup>1</sup> (GB) and the EU markets are clearly distinct markets. Northern Ireland (NI) has a special regime.

The UKCA marking is the new compliance mark for the GB market.

The switch to the UKCA marking is initially voluntary but will become compulsory from 1 January 2022; it means that the reversed epsilon will be recognised until 31 December 2021.

Until 31 December 2022, the UKCA marking may be affixed to a label or a document accompanying the dispenser.

Aerosol dispensers for the NI market must be marked with the reversed epsilon.

#### Note 1:

- From 1 January 2021, for EU companies, aerosol dispensers exported to the GB must have the relevant contact details of the relevant GB importer on the product.
- From 1 January 2021 for GB companies, aerosol dispensers exported to the EU must have the relevant contact details of the relevant EU importer on the product.
- From 1 January 2021 for GB companies, aerosol dispensers exported to the NI must have the relevant contact details of the relevant NI importer on the product.

Note 2: The UK continues to recognise the voluntary use of the e-mark to denote compliance with the average system of quantity control for packaged goods.

Note 3: For EU companies, cosmetic products (also in aerosol dispensers) exported to the GB will be labelled with the country of origin based on the product-specific rules of origin laid down in the EU-UK Trade and Cooperation Agreement. The same rules apply to GB companies exporting cosmetic products to the EU.

### Dual labelling of reversed epsilon and UKCA marks

For companies placing the same product on both the EU and GB markets, it could become useful to label both the reversed epsilon and the UKCA marks.

This dual labelling is not prohibited, provided that the marks may not be confused by the consumer.

The reversed epsilon will become irrelevant on the GB market for enforcement authorities from 1 January 2022. It will simply have no meaning anymore for GB enforcement authorities as other marks/logos for example the “green dot”, a “2P” or “2Q” marks...

The UKCA is irrelevant on the EU market for enforcement authorities. It simply has no meaning for EU enforcement authorities as other marks/logo for example a “2P” or “2Q” mark...

Note 4: For companies placing the same product on both the EU and GB markets, the relevant contact details both in the EU and GB must also be on the product.

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<sup>1</sup> England, Scotland and Wales