STEEL CONSTRUCTION
UKCA Marking

UKCA Arrivals

<table>
<thead>
<tr>
<th>Marking</th>
<th>Date</th>
<th>Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>UKCA MARKING</td>
<td>01 JANUARY 2021</td>
<td>ARRIVED</td>
</tr>
<tr>
<td>CE MARKING</td>
<td>30 JUNE 2025</td>
<td>DEPARTING</td>
</tr>
</tbody>
</table>
Steel for Life and the British Constructional Steelwork Association (BCSA) are working closely together to promote the effective use of structural steelwork. This collaborative effort ensures that advances in the knowledge of the constructional use of steel are shared with construction professionals.

Steel is, by a considerable margin, the most popular framing material for multi-storey buildings in the UK and has a long track record of delivering high quality and cost-effective structures with proven sustainability benefits. Steel can be naturally recycled and reused continuously, and offers a wide range of additional advantages such as health and safety benefits, speed of construction, quality, efficiency, innovation, offsite manufacture and service and support.

The steel sector is renowned for keeping specifiers abreast of the latest advances in areas such as fire protection of structural steelwork, UKCA marking and achieving buildings with the highest sustainability ratings. The ‘Steel Construction’ series of publications has provided detailed guidance on a range of key topics and market sectors. Guidance is provided on all relevant technical developments as quickly as is possible.

The sector’s go to resource website – www.steelconstruction.info – is a free online encyclopedia for UK construction that shares a wealth of up-to-date, reliable information with the construction industry in one easily accessible place.

This publication has been funded by Steel for Life and would not be possible without the support of our sponsors.

Steel for Life is a wholly owned subsidiary of BCSA

For further information about steel construction and Steel for Life please visit www.steelconstruction.info or www.steelforlife.org

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From 1 January 2021, construction products placed on the GB market should be UKCA marked (or CE marked until 30 June 2025).

From 1 July 2025, construction products placed on the GB market must be UKCA marked from a UK Approved Body.
UK Conformity Assessed marking (UKCA marking) demonstrates compliance with the appropriate manufacturing standard for a product placed on the UK market of Great Britain (GB), comprising England, Scotland and Wales. For the UK market of Northern Ireland (NI) the equivalent is CE and UKNI. Introduced on 1 January 2021 it covers goods that previously required CE marking for products sold in the European Union, of which the UK was formerly a member.

Under the Construction Products Regulation (CPR)\(^1\), legal obligations are placed on manufacturers, distributors and importers of construction products used within the UK market of GB to UKCA mark their products where they are covered by a UK Designated Standard. This applies not only to constituent products (such as steel beams and bolts etc) but also to fabricated elements and systems made from both UKCA marked and non-UKCA marked products. Similar obligations apply in NI where such products should be CE and UKNI marked.

CE marking will continue to be recognised in both the UK markets of GB and NI until 30 June 2025, but from 1 July 2025 CE marking will no longer be acceptable in GB.

In the UK, Trading Standards is the enforcement agency for non-compliance. Penalties for non-compliance include suspension notices, prohibition notices, notices to warn and application for forfeiture. For certain offences the penalties may include a fine, imprisonment or both.

The CPR describes the legal obligations it places on the construction supply chain in terms of ‘manufacturers’, ‘distributors’ and ‘importers’. However, the construction supply chain in the UK would normally be described in terms of clients, designers, specifiers, contractors and specialist subcontractors. The purpose of this publication is to provide some guidance to the UK supply chain on the implications of the CPR on steel construction.

The requirements of the CPR and UKCA marking (and NI equivalent) apply to construction products used on a project irrespective of the design standard adopted for that project, i.e. BS 5950 or BS EN 1993 for example.

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\(^1\) For the purposes of this publication CPR refers to The Construction Products (Amendment etc.) (EU Exit) Regulations 2019 (S.I. 2019/465) and provisions in the European Union (Withdrawal Agreement) Act 2020 (Commencement No. 1) Regulations 2020 (S.I. 2020/75)
UKCA marking is the UK product marking that is now used for goods being placed on the market in GB. It covers goods which previously required CE marking. Goods can carry both the CE and UKCA markings so long as they are fully compliant with both UK and EU regulations.

The UKCA marking demonstrates compliance with the appropriate UK designated standard for a product. All mainstream construction products are covered by UK designated standards and must therefore be UKCA marked, although CE marking can still be used in GB until 30 June 2025.

A list of the relevant European harmonised standards and their equivalent UK designated standards is provided in the table (right). Initially, the European harmonised standards and the UK designated standards will be the same. However, in the future, there may be the need to supplement the UK designated standards in some way so they continue to meet the requirements of the UK.

For UKCA marking, manufacturers must publish UK declarations of performance for their products. In due course it is likely that:

- British Steel’s UK DoPs will be available at: www.britishsteel.co.uk/who-we-are/approvals-certifications/declarations-of-performance/
- Tata Steel’s UK DoPs will be available at: www.tatasteeleurope.com/construction/download-centre/declarations-of-performance

### Product standards for UKCA and CE marking

<table>
<thead>
<tr>
<th>Product Type</th>
<th>European Harmonised Standards</th>
<th>UK Designated Standards</th>
</tr>
</thead>
<tbody>
<tr>
<td>Open sections</td>
<td>BS EN 10025-1</td>
<td>BS EN 10025-1</td>
</tr>
<tr>
<td>Hollow sections</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Hot finished</td>
<td>BS EN 10210-1</td>
<td>BS EN 10210-1</td>
</tr>
<tr>
<td>Cold formed welded</td>
<td>BS EN 10219-1</td>
<td>BS EN 10219-1</td>
</tr>
<tr>
<td>Plates</td>
<td>BS EN 10025-1</td>
<td>BS EN 10025-1</td>
</tr>
<tr>
<td>Structural bolts</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Non-preloaded structural bolting assemblies</td>
<td>BS EN 15048-1</td>
<td>BS EN 15048-1</td>
</tr>
<tr>
<td>High strength structural bolting assemblies for preloading</td>
<td>BS EN 14399-1</td>
<td>BS EN 14399-1</td>
</tr>
<tr>
<td>Fabricated structural steelwork</td>
<td>BS EN 1090-1</td>
<td>BS EN 1090-1</td>
</tr>
</tbody>
</table>

**Note:**
1. A full list of harmonised standards can be found on the EU’s Nando website: www.ec.europa.eu/growth/tools-databases/nando/
UKCA marking of fabricated structural steelwork

For fabricated structural steelwork, engineers, contractors and steelwork contractors should have amended their specifications to require that only UKCA marked (or CE marked until 30 June 2025) products are used on their projects in GB.

The UK designated standard covering fabricated structural steelwork is BS EN 1090-1, which is the same as the current European harmonised standard. All fabricated structural steelwork delivered to a site in GB must be UKCA marked (or CE marked until 30 June 2025) against BS EN 1090-1.

BS EN 1090-1 gives Requirements for Conformity Assessment of Structural Components. It describes how manufacturers can demonstrate that the components they produce meet the declared performance characteristics (the structural characteristics which make them fit for their particular use and function).

BS EN 1090-2 gives Technical Requirements for Steel Structures. It specifies the requirements for the execution (fabrication and erection) of steel structures to ensure adequate levels of mechanical resistance and stability, serviceability and durability. It determines the performance characteristics for components that the manufacturer must achieve and declare through the requirements of BS EN 1090-1.

Specifications

Contracts for fabricated structural steelwork for buildings should include the National Structural Steelwork Specification (NSSS) for Building Construction (7th Edition), which incorporate the obligations of BS EN 1090-1 and BS EN 1090-2 on the steelwork contractor.

CE marking compliance became a condition of membership of the BCSA from 1 July 2014. BCSA will now require members to be compliant with the marking schemes in GB, NI and Ireland as appropriate (see table on page 19). This means that selection of any BCSA Member company will guarantee that the steelwork contractor will have the necessary certification to comply with BS EN 1090-1.

Clients and main contractors will therefore continue to have confidence in the complete supply chain for steel construction from manufacture of the steel sections through distribution to fabrication and erection on site.

Northern Ireland

Special arrangements apply in Northern Ireland where goods placed on the market still need to meet EU rules, as demonstrated by mandatory third-party conformity assessments. If the assessment is carried out by an EU Notified Body, then the products will be CE marked. If it is carried out by a UK Approved Body/Notified Body (NI), then the products will carry both a CE mark and a UKNI mark. This applies equally to construction products and fabricated steelwork. See page 19 for further details.
Engineer’s responsibility

For any project, the required quality of fabrication or Execution Class must be specified. The procedure to determine the Execution Class is set out in Annex C of BS EN 1993-1-1 and its associated UK National Annex. The Execution Class should be specified for:

• The works as a whole
• An individual component
• A detail of a component

The engineer is responsible for specifying the Execution Class for the structure (the works as a whole) and for components and details where it is appropriate to specify an Execution Class different to that specified for the structure. Where different, the Execution Class for a component or detail should not be lower than that specified for the works as a whole. The Execution Class for a component or detail should be clearly identified in the execution specification if it is different to the Execution Class for the structure.

The procedure for determining the Execution Class for buildings is a straightforward two step process:

1. Determine the Consequences Class
2. Select the Execution Class

Whilst each building needs to be considered on its own merits, Execution Class 2 (EXC2) will be appropriate for the majority of buildings constructed in the UK. If the Consequences Class is not specified, clause NA 2.27.2 of the National Annex to BS EN 1993-1-1: 2005+A1: 2014 states that it should be assumed that the design rules in BS EN 1993 are safe for classes up to and including Consequence Class 2.

It should also be noted that the body of the NSSS for Building Construction has been written for the steelwork contractor to deliver the requirements of EXC2. The 7th edition includes specific requirements for EXC3 in annexes for static and fatigue designs of structures.
1. Determine the Consequences Class

The purpose of categorising the Consequences Class is to ensure that buildings are constructed with the appropriate level of quality control within the fabrication process.

The Consequences Class for a building is derived on the basis of building type, building height (number of storeys), floor plan area per storey (for retail) and occupancy. A structure, or a part of it, could also contain components with different Consequences Classes.

Table 11 of Approved Document A may be used to determine the Consequences Class for a range of building types and occupancy. In Table 11, CC2a and CC2b are sub-divisions of CC2 when determining the Execution Class required for a structure.

### Table 11 Building Consequences Classes

<table>
<thead>
<tr>
<th>Consequence Class</th>
<th>Building type and occupancy</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Houses not exceeding 4 storeys. Agricultural buildings. Buildings into which people rarely go, provided no part of the building is closer to another building, or area where people do go, than a distance 1½ times the building height.</td>
</tr>
<tr>
<td>2a Lower Risk Group</td>
<td>5 storey single occupancy houses. Hotels not exceeding 4 storeys. Flats, apartments and other residential buildings not exceeding 4 storeys. Offices not exceeding 4 storeys. Industrial buildings not exceeding 3 storeys. Retailing premises not exceeding 3 storeys of less than 2,000m² floor area in each storey. Single storey educational buildings. All buildings not exceeding 2 storeys to which the public are admitted and which contain floor areas not exceeding 2,000m² at each storey.</td>
</tr>
<tr>
<td>2b Upper Risk Group</td>
<td>Hotels, blocks of flats, apartments and other residential buildings greater than 4 storeys but not exceeding 15 storeys. Educational buildings greater than 1 storey but not exceeding 15 storeys. Retailing premises greater than 3 storeys but not exceeding 15 storeys. Hospitals not exceeding 3 storeys. Offices greater than 4 storeys but not exceeding 15 storeys. All buildings to which the public are admitted and which contain floor areas exceeding 2,000m² but less than 5,000m² at each storey. Car parking not exceeding 6 storeys.</td>
</tr>
<tr>
<td>3</td>
<td>All buildings defined above as Consequence Class 2a and 2b that exceed the limits on area and/or number of storeys. Grandstands accommodating more than 5,000 spectators. Buildings containing hazardous substances and/or processes.</td>
</tr>
</tbody>
</table>

**Notes:**

1. For buildings intended for more than one type of use the Consequences Class should be that pertaining to the most onerous type.
2. In determining the number of storeys, basement storeys may be excluded provided such basement storeys fulfil the robustness requirements of Consequences Class 2b buildings.
3. BS EN 1991-1-7:2006+A1:2014 with its UK National Annex also provides guidance that is comparable to Table 11.

As note 1 of Table 11 states, the Consequences Class for a mixed-use building will be that pertaining to the most onerous occupancy type.

Table 11 presents the Consequences Classes for the buildings it considers in a helpful but generic way. Where a building falls just outside the threshold of CC2 in Table 11, designers may wish to determine the Consequences Class from first principles to see if CC2 can still be applied. Section 5.4 of Approved Document A sets out the alternative approach.
2. Selection of Execution Class

Having determined the Consequences Class for a building, the required Execution Class is simply derived from Table NA.4 of the National Annex to BS EN 1993-1-1:2005+A1:2014.

<table>
<thead>
<tr>
<th>Parts of BS EN 1993 which are applicable to the design of the structure¹</th>
<th>All relevant Parts except Part 1-9 or Part 1-12</th>
<th>All relevant Parts including Part 1-9 and/or Part 1-12²</th>
<th>Notes</th>
</tr>
</thead>
<tbody>
<tr>
<td>Other Eurocodes applicable to the design of the structure¹ (in addition to BS EN 1990 and BS EN 1991)</td>
<td>Required</td>
<td>–</td>
<td>–</td>
</tr>
<tr>
<td>Optional</td>
<td>BS EN 1994</td>
<td>BS EN 1994</td>
<td>BS EN 1994</td>
</tr>
<tr>
<td>Execution Classes</td>
<td>RC1, CC1</td>
<td>Minimum EXC2</td>
<td>Generally EXC3</td>
</tr>
<tr>
<td>RC2, CC2</td>
<td>Minimum EXC2</td>
<td>Generally EXC3</td>
<td>Generally EXC3</td>
</tr>
<tr>
<td>RC3, CC3</td>
<td>EXC3</td>
<td>Minimum EXC3</td>
<td>Minimum EXC3</td>
</tr>
</tbody>
</table>

Note: ¹ or a distinct, clearly identifiable zone of a structure

For the majority of buildings constructed in the UK, EXC2 will be the appropriate requirement. Where the Consequences Class is not specified clause NA 2.27.2 of the National Annex to BS EN 1993-1-1:2005+A1:2014 states that it should be assumed that the design rules in BS EN 1993 are safe for Consequences Classes up to and including CC2.

The engineer should always derive the Execution Class based on the design parameters appropriate to each project. The requirements to each Execution Class are listed in Table A3 of BS EN 1090-2 and can be reviewed by the engineer if desired.

However, the engineer should avoid overspecification of the Execution Class wherever possible to avoid unnecessary costs being introduced. For example, EXC2 is the Execution Class derived for a project but the engineer requires full traceability (an EXC3 requirement) instead of the partial/batch traceability requirement of EXC2. Rather than specifying EXC3 on the basis of achieving this single clause requirement, it is suggested that EXC2 is still specified but with the higher level of traceability added to the specification.
Steelwork contractor requirements for UKCA marking

If steelwork contractors are already CE marked and their Notified Body has become a UK Approved Body, they do not have to be recertified until their next scheduled audit.

In order to be able to UKCA mark the fabricated structural steelwork that they produce, steelwork contractors are required to declare performance to the System 2+ system of Assessment and Verification of Constancy of Performance (as described in Annex V of the CPR). This requires them to undertake:

- Initial type-testing of the product
- Factory Production Control (FPC), which includes
  - Implementation of FPC system procedures
  - Appointment of a responsible welding coordinator (RWC)
  - Implementation of welding quality management system (WQMS) procedures
- Further testing of samples taken at the factory in accordance with the prescribed test plan

They must also have been assessed by a UK Approved Body that will carry out:

- Initial inspection of the manufacturing plant
- Initial inspection of the FPC
- Continuous surveillance, assessment and approval of the FPC, which will typically include:
  - An annual audit to ensure continued competence to the declared Execution Class (Table B.3 of BS EN 1090-1 sets out minimum levels for the routine surveillance intervals)

The UK Approved Body will then issue an FPC certificate and Welding Certificate identifying the Execution Class that the steelwork contractor has achieved.
Client and/or main contractor’s responsibility

For all fabricated structural steelwork delivered to site in GB there is a legal requirement under the CPR that it is UKCA marked (or CE marked until 30 June 2025).

In order to achieve this, the client or main contractor should appoint a steelwork contractor with an Execution Class equal to that required for the project. It should be noted that steelwork contractors with EXC3 capability can be used for EXC1, 2, & 3; and a steelwork contractor with EXC2 capability can only be used for EXC1 & 2.

The BCSA has made compliance with the marking schemes in GB, NI and Ireland (as appropriate) a condition of membership of the Association, so selection of a BCSA Member company ensures that the steelwork contractor has the necessary accreditation to comply with the CPR requirements.

ABC Engineering Ltd
Guide Contract Value: above £6,000,000
Accredited Certification: WQMS-C, EM, HSM, QM, FPC-EXC4
SCSC: Gold Member
Membership: SCCS | SCSC | BCSA

The directories for buildings and bridgeworks on BCSA’s website include details of accredited certification levels achieved by each member. Clients and main contractors can use this to find steelwork contractors with an Execution Class equal to that required for their project.

Contract documentation should also be updated to incorporate the NSSS 7th Edition, which incorporates the obligations of BS EN 1090-1 and BS EN 1090-2 on the steelwork contractor.

It should be noted that if an EU steelwork contractor is used on a project, the CPR puts liability on clients and/or main contractors. In that instance, the party engaging the steelwork contractor would be classed as an importer under the CPR and must comply with ‘Obligations of Importers’ given in Article 13 of the regulations.

Northern Ireland

Special arrangements apply in Northern Ireland where goods placed on the market still need to meet EU rules, as demonstrated by mandatory third-party conformity assessments. If the assessment is carried out by an EU Notified Body, then the products will be CE marked. If it is carried out by a UK Approved Body/Notified Body (NI), then the products will carry both a CE mark and a UKNI mark. This applies equally to construction products and fabricated steelwork. See page 19 for further details.
UKCA marked fabricated steelwork must be supported by a Factory Production Control (FPC) Certificate, a Welding Certificate and a UK Declaration of Performance.

How to check compliance with the CPR and UKCA marking

In order for a steelwork contractor to demonstrate their right to UKCA mark their products, they must provide the following three documents:

1. Factory Production Control (FPC) Certificate – issued by a UK Approved Body
2. Welding Certificate, as required by BS EN 1090-1
3. UK Declaration of Performance (UK DoP) – issued by the steelwork contractor

The client or main contractor engaging the steelwork contractor should carry out due diligence before appointing them.

Likewise, insurers should complete a similar due diligence process before giving Professional Indemnity insurance to a steelwork contractor who must UKCA mark their products.

Selecting a BCSA Member will ensure compliance with the relevant legislation. The client, main contractor or insurer would not need to carry out due diligence of the steelwork contractor in this case since it has already been undertaken by the BCSA as part of their membership audit.
There will be a transition period, before the steelwork contractor’s next audit, where they may continue to hold a Factory Production Control (FPC) Certificate and a Welding Certificate issued by their certification body before 1 January 2021 (ie: when they were an EU Notified Body).

However, their previous Declaration of Performance will need to be updated to a UK Declaration of Performance against BS EN 1090-1 immediately.

The UK Approved Body will issue a new Factory Production Control (FPC) Certificate and a new Welding Certificate at the next re-certification audit.

What to check – Factory Production Control and Welding Certificates

1. Declared performance – ensure that the steelwork contractor meets or exceeds the Execution Class requirements for the project.
2. Base materials – the steelwork contractor is covered for welding with material strength and subgrades up to and including those declared on the Welding Certificate. Ensure that these are consistent with the requirements of the project.
3. Date of expiry – check that the certificate is still current and covers the period of the contract.
4. Certification Body:
   a. Notified Body number – check on the EU’s Nando website to ensure that it is a valid and current number associated with the notified body named on each certificate.
   b. UK Approved Body number – check the database on www.gov.uk/uk-market-conformity-assessment-bodies to ensure that it is a valid and current number associated with the UK Approved Body named on each certificate. The UK Approved Body numbers will be the same for those Notified Bodies transferred to UK Approved Bodies at the end of 2020.

What to check – UK Declaration of Performance

The UK Declaration of Performance (UK DoP) is very similar to the Declaration of Performance (DoP) and must be made available with products that are UKCA Marked.

The content of the UK DoP should include:

A. Reference number for the UK DoP
   Unique identification code of the product type
   Type, batch or serial number or any other element allowing identification of the construction product

B. Intended use or uses in accordance with the UK designated standard (e.g. BS EN 1090-1)

C. Name, registered trade name or registered trademark and contact address of the manufacturer

D. System or systems of assessment and verification of constancy of performance (e.g. 2+)

E. Name and identification number of the UK Approved Body

F. A table listing the essential characteristics given in the UK designated standard together with the declared performance and the reference number for the UK designated standard

G. A declaration signed for on behalf of the manufacturer.

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UK Declaration of Performance
No. 1234

Type
ABC

Intended Use
ABCD

Manufacturer
ABC Engineering Ltd, Thrimpson Road, Grillnik, Pondington, West Plumshire PM15 7TL

Verification of constancy
System 2+

UK Approved Body
Steel Construction Certification Scheme 4, Whitehall Court, Westminster, London SW1A 2ES

UK Approved Body No
2773

SCCS has performed (i) initial inspection of the manufacturing plant and factory product control and (ii) continuous surveillance, assessment and evaluation of factory production control and issued Factory Production Control Certificate 2273-CPR-001 and Welding Certificate 2273-CPR-001-WC.

Essential characteristics

<table>
<thead>
<tr>
<th>Performance</th>
<th>UK Designated Standard</th>
</tr>
</thead>
<tbody>
<tr>
<td>Tolerances on dimensions and shape</td>
<td>BS EN 1090-2, tolerance class 1</td>
</tr>
<tr>
<td>Workability</td>
<td>BS EN 1090-2, T275</td>
</tr>
<tr>
<td>Fatigue strength</td>
<td>BS EN 280-1</td>
</tr>
<tr>
<td>Resistance to fire</td>
<td>BS EN 1090-1</td>
</tr>
<tr>
<td>Reactivity of galvanised and its compounds</td>
<td>BS EN 1090-1</td>
</tr>
<tr>
<td>Durability</td>
<td>BS EN 1090-1</td>
</tr>
<tr>
<td>Surface preparation according to BS EN 1090-2, Preparation grade P3, Surface painted according to BS EN 62-1244</td>
<td></td>
</tr>
</tbody>
</table>

The performance of the product identified above is in conformity with the declared performance identified in the table.

Signed for and on behalf of ABC Engineering Ltd by:

John Smith, Director
Pondington, Plumshire
4 January 2021
Summary

Overview

It is a legal requirement to use UKCA marked construction products in GB (or CE marked until 30 June 2025). For UKCA marking, manufacturers must publish UK declarations of performance for their products. In due course it is likely that:

- British Steel's UK DoPs will be available: [www.britishsteel.co.uk/who-we-are/approvals-certifications/declarations-of-performance/](http://www.britishsteel.co.uk/who-we-are/approvals-certifications/declarations-of-performance/)
- Tata Steel’s UK DoPs will be available: [www.tatasteeleurope.com/construction/download-centre/declarations-of-performance](http://www.tatasteeleurope.com/construction/download-centre/declarations-of-performance)

It is also a legal requirement for all fabricated structural steelwork delivered to sites in GB to be UKCA marked (or CE marked until 30 June 2025). In order to comply with the regulations, only steelwork contractors with an Execution Class equal to that required for a project should be considered.

Contracts for fabricated structural steelwork delivered to site should include the NSSS for Building Construction 7th Edition. This specification incorporates the obligations of the CPR and UKCA (or CE marking until 30 June 2025) on the steelwork contractor.

Engineer’s responsibility

The engineer is responsible for specifying the Execution Class for the structure as a whole, the components and the details that they have designed.

Procedure for specification of Execution Class for a building:

1. Determine Consequences Class – Table 11 of Approved Document A
   [Usually 2a or 2b]
   [Will typically result in EXC2]

Whilst each building needs to be considered on its own merits, EXC2 will be appropriate for the majority of buildings constructed in the UK.

If the Consequences Class is not specified clause NA 2.27.2 of the National Annex to BS EN 1993-1-1:2005+A1:2014 states that it should be assumed that the design rules in BS EN 1993 are safe for Consequences Classes up to and including CC2.
Client and/or main contractor’s responsibility

For all fabricated structural steelwork delivered to site in GB, there is a legal requirement under the CPR that it is UKCA marked (or CE marked until 30 June 2025).

To achieve this, the client or main contractor should appoint a steelwork contractor with an Execution Class equal to that required for the project, as determined by Annex C of BS EN 1993-1-1 and its associated National Annex. It should be noted that steelwork contractors with EXC3 capability can be used for EXC1, 2, & 3; and a steelwork contractor with EXC2 capability can only be used for EXC1 & 2.

Selection of a BCSA Member company will guarantee that the steelwork contractor will have the necessary accreditation to comply with the relevant legislation. The directories for buildings and bridgeworks on BCSA's website (www.steelconstruction.org) include details of accredited certification levels achieved by each member.

It should be noted that if an EU steelwork contractor is used on a project, the CPR puts liability on clients and/or main contractors. In that instance, the party engaging the steelwork contractor would be classed as an importer under the CPR and must comply with ‘Obligations of Importers’ given in Article 13 of the regulations.

Check compliance with the CPR and UKCA marking

In order for a steelwork contractor to demonstrate their right to UKCA mark their products, they must provide the following documents:

1. Factory Production Control Certificate
2. Welding Certificate
3. UK Declaration of Performance

The client or main contractor engaging the steelwork contractor should carry out due diligence before appointing any steelwork contractor who will be delivering fabricated structural steelwork to site. Likewise, insurers should complete a similar due diligence process before giving Professional Indemnity insurance to a steelwork contractor who must UKCA mark their products.

Selecting a BCSA Member will ensure compliance with the relevant legislation. The client, main contractor or insurer would not need to carry out due diligence of the steelwork contractor in this case since it has already been undertaken by the BCSA as part of their membership audit.
From 1 January 2021, construction products placed on the NI market should be marked with CE marking from a EU Notified Body or CE and UKNI marked from a UK Approved Body/Notified Body (NI)

UKCA marking by a UK Approved Body is not valid in NI

CE and UKNI marking by a UK Approved Body/Notified Body (NI) is not valid in the EU
Arrangements for Northern Ireland

Conformity assessment

The Northern Ireland Protocol came into force on 1 January 2021 and for as long as it applies, manufactured goods placed on the market in Northern Ireland will need to meet EU rules. EU conformity markings will continue to be used to show such goods meet the EU rules, and for construction products this will continue to be CE marking, i.e. all construction products placed on the market in NI must comply with the EU CPR, as demonstrated by a mandatory third-party conformity assessment.

If that conformity assessment is carried out by an EU Notified Body, then the products would carry a CE mark and can be placed on the EU as well as the NI market.

If the conformity assessment is carried out by a UK Approved Body/Notified Body (NI), then the products would carry both a CE mark and a UKNI mark. The CE and UKNI marks resulting from the conformity assessment by the UK Approved Body/Notified Body (NI) allow the products to be placed on the NI market. The UKNI mark cannot be used in isolation, it must be carried alongside the CE mark.

Note that the UKNI mark is not recognised by the EU, so if goods are to be placed on the EU market, they must use the CE mark only, without the UKNI mark, and the conformity assessment must be carried out by an EU Notified Body.

For products manufactured in GB and also traded in the GB market, any CE or CE and UKNI marking that may be required for NI will be in addition to UKCA marking (the UKCA marking alone cannot be used for goods placed on the market in NI; it needs to be accompanied by either the CE mark from an EU Notified Body or the CE and UKNI marks from a UK Approved Body/Notified Body (NI).

Moving goods from Northern Ireland to Great Britain

The UK government has guaranteed unfettered access for Northern Ireland’s businesses to the whole of the UK market, without the need for additional approvals before placing goods on the market in the rest of the UK. Qualifying Northern Ireland goods, including construction products, may be placed on the market in Great Britain based on the conformity markings used in Northern Ireland.

<table>
<thead>
<tr>
<th>Market</th>
<th>Appropriate marking schemes Until 30 June 2025</th>
<th>From 1 July 2025</th>
</tr>
</thead>
<tbody>
<tr>
<td>Great Britain (GB)</td>
<td>UKCA or CE and UKNI or CE</td>
<td>UKCA or CE and UKNI or CE*</td>
</tr>
<tr>
<td>Northern Ireland (NI)</td>
<td>CE and UKNI or CE</td>
<td>CE and UKNI or CE</td>
</tr>
<tr>
<td>Republic of Ireland</td>
<td>CE</td>
<td>CE</td>
</tr>
</tbody>
</table>

Notes:
CE* - CE marking from an EU Notified Body is only recognised in GB from 1 July 2025 for qualifying Northern Ireland goods under unfettered access.
Steel for Life
Steel for Life is a wholly owned subsidiary of BCSA, created in 2016, with funding provided by sponsors from the whole steel supply chain. The main purpose of Steel for Life is to communicate the advantages that steel offers to the construction sector. By working together as an integrated supply chain for the delivery of steel-framed solutions, the constructional steelwork sector will continue to innovate, educate specifiers and clients on the efficient use of steel, and market the significant benefits of steel in construction.

British Constructional Steelwork Association
BCSA is the national organisation for the steel construction industry: its Member companies undertake the design, fabrication and erection of steelwork for all forms of construction in building and civil engineering. Industry Members are those principal companies involved in the direct supply to all or some Members of components, materials or products. Corporate Members are clients, professional offices, educational establishments etc which support the development of national specifications, quality, fabrication and erection techniques, overall industry efficiency and good practice.

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