

## **Addresses required for CE Marked Products**

### **1. Own-branded Products**

If the customer of a completed product chooses to own-brand it, in EU legal terms they have declared themselves to be the Manufacturer and so their address should be placed on the product or packaging. The company physically making the product has no Blue Guide responsibility for the Declaration of Conformity or Technical File and is legally a sub-contractor although the customer will almost certainly contractually require them to compile these documents. Further obligations with regard to market surveillance or with importers and distributors are for the customer to deal with.

### **2. Products sold directly to the end-customer**

If supplying directly to the end-customer, whether in the UK or EU27, your address should be placed on the product or packaging. This can be a UK address even where the customer is in the EU27. No Importer or Distributor responsibilities arise. You are responsible for compiling and holding the Declaration of Conformity and Technical File and making these available to any market surveillance authorities if required.

### **3. Products sold to a UK or EU27 distributor**

Your UK address should be placed on the product or packaging. If selling-on into the EU27 the Distributor may also become the Importer for Blue Guide purposes and have responsibility for putting his name, trade mark and address on the product or packaging as well as assuring that all requirements of the Declaration of Conformity, Technical File and associated compliance obligations have been met by the Manufacturer.

Some UK distributors who sell on into the Republic of Ireland or other EU27 member states have required UK manufacturers to place an EU27 name and address on products purchased. UK government have confirmed that although this would appear to meet one aspect of the Importer's obligations, the distributor involved would still have all the legal responsibilities placed by the Blue Guide on the Importer and/or Distributor.

The EU "Blue Guide" sets out the obligations on Manufacturers, Importers, Distributors and other economic operators for compliance with EU 'New Approach' directives for CE marking.

[https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:52016XC0726\(02\)&from=BG](https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:52016XC0726(02)&from=BG)

Please note that some EU Directives may impose specific obligations for compliance beyond the general Blue Guide requirements. In addition individual EU member state market surveillance authorities may make differing interpretations of regulation.

Compiled by Andrew Willman [andrew.willman@beama.org.uk](mailto:andrew.willman@beama.org.uk)