



UK Government

# Extended CE marking recognition for Ecodesign Regulations

Government response to the consultation on  
extended CE marking recognition for  
Ecodesign Regulations



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# Introduction

## Policy Context

Energy Related Products which have the Conformité Européenne (CE) Mark (the European Union's (EU) conformity mark) can currently be sold in Great Britain (GB) if they are compliant with GB's ecodesign standards. This means they can be placed on the GB market without the need to also affix a UK Conformity Assessment (UKCA) marking. This reduces costs for manufacturers by removing the need to go through two different conformity assessment processes for selling the same goods in the EU and GB.

On 18 July 2024, the EU brought into effect a new framework for setting ecodesign standards, the Ecodesign for Sustainable Products Regulation ('ESPR'). ESPR will replace the Ecodesign Directive (2009/125/EC). The first EU ecodesign regulations made under ESPR are expected to come into force from mid-2027.

The CE recognition provision in the 2010 Ecodesign Regulations refers exclusively to the EU's Ecodesign Directive. If we do not take action to extend this then products complying with new EU regulations, made under ESPR, will not qualify for CE recognition in GB and will need to go through an additional assessment in order to be sold in GB.

## Summary of Consultation Proposal

This consultation proposed to amend the Ecodesign for Energy Related Products Regulations 2010 to extend the CE marking recognition mechanism to ensure that it also applies to new measures made under ESPR, in the same way as measures made currently under the Ecodesign Directive. Amending the regulations to continue this recognition for products regulated under ESPR in the EU would future-proof the existing policy of CE recognition and provide businesses with long-term certainty.

## Government Response

Following the consultation we have carefully considered the responses. Stakeholders were unanimously supportive of the proposal. The evidence provided set out a number of strong arguments for continuing the arrangement of CE mark recognition by extending it to cover ESPR. Respondents highlighted the overwhelmingly positive impacts of the proposal, particularly the reduction in cost and administrative burden for businesses and associated

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benefits. Many respondents noted that not taking the proposed action would create unnecessary complexity and disruption.

We agree that the proposed measure delivers significant benefits for businesses by saving them the cost and administration burden of going through two conformity assessments as well as simplifying processes, providing choice and avoiding the disruption and complexity of changing arrangements on CE mark recognition. Extending CE mark recognition is a practical and proportionate approach in response to new EU regulation, to continue the current system of recognition and to avoid a complex and evolving system in which the CE mark is recognised for some products but not others. The measure is a technical change which allows a straightforward continuation of the current system where there is no policy reason for change. This matches the intention of indefinite recognition that [the Product Safety and Metrology etc. \(Amendment\) Regulations 2024](#) sought to create, before EU regulation changes were known.

As a result, the government will lay the Statutory Instrument in summer 2026.

As the CE mark is already recognised, the practical effect of this measure will begin in 2027, once EU regulations made under ESPR begin to come into force. However, the measure will have the immediate positive effect of giving businesses greater certainty by confirming that the existing arrangement of CE mark recognition is future-proofed and will continue to apply beyond 2027.

The measure will apply in Great Britain (England, Scotland and Wales) only, as NI follows EU rules on Ecodesign and requires the CE marking. Guidance is already available on the existing [UKCA and CE regimes](#) including [placing UKCA or CE marked products on the market in Great Britain](#). This guidance will continue to apply.

## Note on Alignment

One topic that came up several times in the consultation evidence was compatibility with EU regulation. It is important to reemphasise that the measure will not create alignment of product standards, rather it allows the CE mark to be recognised where products meet both EU and GB Ecodesign standards. As raised in some responses, recognising the CE mark can facilitate manufacturers in continuing to produce the same products for both markets and, where standards are higher in the EU, this could have the effect of also raising the standard of products in GB, as manufacturers choose to meet a single, higher specification. Without continued CE mark recognition, manufacturers wishing to sell in both GB and the EU would need to complete separate conformity assessment processes and may choose separate product lines as a result. In this scenario, manufacturers could be more likely to produce GB specific products that only meet the minimum GB requirements. This increases the likelihood that the GB market features some lower standard products. Continuing the arrangement of CE mark recognition encourages businesses to maintain a single product line which meets EU standards.

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# Consultation responses

## Outline of Respondents

The consultation was published on GOV.UK and ran for 6 weeks between 9 December 2025 and 20 January 2026. The consultation received 17 responses in total, 13 of which were received through Citizen Space.

We identified 17 organisations that responded to the consultation. All responses to this public consultation submitted by 20 January 2026 have been recorded and analysed.

Responses were received from a range of industry stakeholders including manufacturers, trade associations, supplier/ distributors, and online marketplaces.

The relatively low number of respondents is likely due to the specialist nature of the measure and the fact that the practical effect of the proposal is an extension of the current arrangement. Respondents indicated they became aware of the consultation through emails from the department, emails from others and through GOV.UK alerts.

Where respondents were invited to agree or disagree with the policy proposal in question 1, we have set out how many respondents agreed and disagreed. The consultation also sought feedback in the form of written evidence and views from stakeholders, which we have represented in qualitative terms.

## Question 1: Do you agree with the proposal to extend CE recognition to cover ErPs regulated under ESPR, so that it functions in the same way as it currently functions for ErPs regulated under the Ecodesign Directive?

This question included tick boxes for Yes or No. The question also included a text box for respondents to provide their evidence.

We received 17 responses to this question. Of these responses, 17 answered 'Yes' and 0 answered 'No'.

### **Q1. Do you agree with the proposal to extend CE recognition to cover ErPs regulated under ESPR, so that it functions in the same way as it currently functions for ErPs regulated under the Ecodesign Directive?**

Q1	Responses	Percentage
Yes	17	100%

<b>No</b>	0	0%
<b>No answer</b>	0	0%
<b>Comments</b>	17	100%

In the evidence provided, the majority of respondents (11) stated that by eliminating the need to go through two different conformity assessment processes the proposal would avoid unnecessary costs for businesses. The majority (11) also stated that the proposal would avoid administrative burden on businesses by reducing complexity and simplification of a duplicative process.

Other common themes in the evidence given included maintaining continuity with the current arrangement of CE mark recognition which was raised in 5 responses. Responses raised that there was simply no reason to move away from the current arrangement of recognition and that updating the recognition to include ESPR in the same way as the Ecodesign Directive is a logical and necessary action.

Consistency with EU requirements was raised in several responses for the reason that it enables products to be designed for multiple markets, simplifying processes such as stock holding and packaging design. Respondents also highlighted the importance of businesses being able to place the same products on both markets. In addition, respondents noted that EU Ecodesign requirements are higher for many products, so allowing recognition of CE marked products does not risk allowing lower-performing products onto the GB market.

Some responses raised various benefits including knock-on benefits of the cost savings and consistency with the EU including greater choice and lower costs for consumers.

Respondents expanded on their reasoning across Q1 and Q2 and themes relating to positive impacts are explored in more detail in the next section.

## Question 2: What impacts (positive or negative) do you foresee from extending CE marking recognition to cover products regulated under ESPR?

This question included a text box for respondents to provide their views. We received 17 responses to this question.

### **Q2. What impacts (positive or negative) do you foresee from extending CE marking recognition to cover products regulated under ESPR?**

Q2	Responses	Percentage
No answer	0	0%
Comments	17	100%

Respondents detailed a variety of expected impacts of extending CE mark recognition to cover ErPs regulated under ESPR. These were overwhelmingly positive, and many also highlighted the negative impacts of not proceeding with the proposed measure.

### Cost and Administrative Burdens

The most commonly mentioned impacts were lower costs and admin burdens to businesses and associated positive impacts, due to the fact that, under continued CE recognition, it would only be necessary to complete one conformity mark assessment. This would remove the need to begin completing an additional conformity assessment process in order to obtain the UKCA mark.

Respondents noted that, in addition to the direct savings associated with avoiding the process of completing an additional conformity assessment, further cost and administrative benefits would arise from maintaining recognition of the CE mark. They highlighted that being able to supply the same product to both markets without separate markings significantly simplifies workloads, reduces business costs (such as labelling/stock management costs) and administrative complexity for manufacturers and importers, and frees up capacity that businesses can redirect towards activities such as product development and innovation.

Many noted avoiding duplication and general efficiency as positive impacts of the policy. It was also raised that the policy provides manufacturers with flexibility and the choice of whether to pursue CE or UKCA marking.

Another additional knock-on benefit of the lower cost and admin burdens that was raised by some respondents was that the reduced cost could have a knock-on effect on price of the product leading to better value for customers.

### Reducing Barriers

Some respondents stated that maintaining CE mark recognition would reduce trade barriers between the EU and GB, with associated benefits for trade in Northern Ireland, which follows EU ecodesign and labelling requirements. Specific benefits highlighted included smoother movement of goods, and improved product availability, competitiveness and consumer choice. Respondents also noted that a single route to demonstrate compliance across GB and EU markets would simplify operations and avoid inefficiencies for manufacturers supplying UK, EU and global markets.

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## Continuity

Respondents also highlighted a further set of benefits associated with pursuing the policy, centred on the importance of continuity and the risks associated with not taking the proposed action.

Some respondents noted that the proposed measure would avoid the disruption of transition, noting that without the proposed action, there would effectively be a transition to a new system in which CE marking remained recognised for some products, while for others only UKCA would be recognised. They emphasised that such a mixed approach could create confusion for businesses and lead to unnecessary disruption.

Respondents highlighted the benefits of continuity of a system that is already well understood by both manufacturers and market surveillance authorities.

A related positive impact of taking this action now is that it provides regulatory certainty. This impact would have an immediate effect, as it allows manufacturers to plan without the risk of sudden changes or deadlines which provides stability for the market.

Respondents noted that delaying or not taking the proposed action could result in uncertainty for businesses, whereas proceeding now ensures ongoing recognition and provides clarity for beyond 2027.

## Impact on Consumers

In addition to comments noting that the proposed policy could avoid parallel product streams for GB and EU markets, some respondents raised concerns that if the proposed policy were not taken this could lead to potential impacts on customers. This included a concern raised about manufacturers prioritising EU markets over GB resulting in lower product availability.

One respondent raised a concern of potential “*dumping*” of the worst products. As new product regulation is made in the EU under ESPR, GB may at times have comparatively lower requirements. The concern raised expressed that this could cause “*two tier product regulation*” between the EU and the UK and that could lead to the potential “*dumping*” of the least efficient products onto the UK market.

Extending the CE recognition for ErPs mitigates against this, as most manufacturers would choose to supply products to both markets for reasons of efficiency and therefore would comply with the highest product standards.

Additionally, several responses expressed a preference for alignment with the EU and indicated that not taking the proposed action, and therefore requiring both conformity markings for certain products, would be perceived as creating a divergence from the EU.

The extension would not create alignment of product standards as it only allows the CE mark to continue to be recognised where products also meet GB Ecodesign standards. However, if not enacted it would lead to a divergence of conformity markings, from 2027, for new product

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regulation made under ESPR, where previously businesses had been using recognition allowed for product regulation made under the Ecodesign Directive.

### Need for guidance

One negative impact raised was that there may be different interpretations and approaches to enforcement of regulations for products with CE mark which could create confusion and therefore it would be necessary to have clear guidance. This is expanded on in the next section.

### Question 3: Do you foresee any compliance or enforcement challenges arising from the extension of CE recognition to products regulated under ESPR?

Q3	Responses	Percentage
Yes	1	6%
No	15	94%
No answer	1	6%
Comments	16	94%

The question included a text box for respondents to provide their views. We received 16 responses to this question. The majority of responses (15) noted no anticipated compliance or enforcement challenges that could arise from the proposal. Of these, one response one noted that not proceeding with the proposed measure would itself create compliance and enforcement challenges. Several commented that the proposal could lead to improvements in compliance and enforcement.

One response raised that there may be potential challenges if implementation is not supported by clear guidance and certainty on how the extended recognition will operate in practice. The same respondent also cited a risk of inconsistent application and confusion among enforcement authorities and highlighted the importance of enforcement being aligned across relevant bodies, including those in Europe, to maintain fairness and predictability.

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This publication is available from: <https://www.gov.uk/government/consultations/extended-ce-marking-recognition-for-ecodesign-regulations>

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