



CE Marking Policy Statement

Imperial Ductwork Services checks the presence of CE marking when receiving any products or goods. This can be carried out by using the "Declaration of Conformity – CE Marking Checklist". Imperial Ductwork Services of the manufacture of bespoke ductwork are not required to form any CE Marking of our own products. When purchasing from suppliers the following details are checked, using the conformity of CE Marking checks.

Why do we need CE Marking?

The CE marking is required for many products. It:

- shows that the manufacturer has checked that these products meet EU safety, health or environmental requirements.
- is an indicator of a product's compliance with EU legislation.
- allows the free movement of products within the European market.

By placing the CE marking on a product a manufacturer is declaring, on their sole responsibility, conformity with all of the legal requirements to achieve CE marking. The manufacturer is thus ensuring validity for that product to be sold throughout the EEA. This also applies to products made in third countries which are sold in the EEA and Turkey.

Not all products must bear the CE marking. Only those product categories subject to specific directives that provide for the CE marking are required to be CE marked.

CE marking does not mean that a product was made in the EEA, but states that the product is assessed before being placed on the market. It means the product satisfies the legislative requirements to be sold there. It means that the manufacturer has checked that the product complies with all relevant essential requirements, for example health and safety requirements.

If you are a manufacturer, it is your responsibility to:

- carry out the conformity assessment.
- set up the technical file.
- issue the EC Declaration of Conformity (DoC)
- place CE marking on a product.

If you are a distributor, you must check the presence of both the CE marking and the necessary supporting documentation.

If you are importing a product that is from a third country, you have to check that the manufacturer outside the EU has undertaken the necessary steps. You must check that the documentation is available.



CE marking applies to products, ranging from electrical equipment to toys and from civil explosives to medical devices. The full list of these product categories is below:

- active implantable medical devices
- appliances burning gaseous fuels
- cableway installations designed to carry persons
- eco-design of energy related products
- electromagnetic compatibility
- equipment and protective systems intended for use in potentially explosive atmospheres
- explosives for civil uses
- hot-water boilers
- household refrigerators and freezers
- in vitro diagnostic medical devices
- lifts
- low voltage
- machinery
- measuring instruments
- medical devices
- noise emission in the environment
- non-automatic weighing instruments
- personal protective equipment
- pressure equipment
- pyrotechnics
- radio and telecommunications terminal equipment
- recreational craft
- safety of toys
- simple pressure vessels

How to place a CE marking on a product

Before you place a CE marking on a product, you need to establish which EU New Approach Directives apply to your product. You must not attach a CE marking to a product outside the scope of the directives. The process you follow depends on the directives that apply to your product.

1. Identify the directive(s) and harmonised standards applicable to the product

There are more than 20 directives setting out the product categories requiring CE marking. The essential requirements that products have to fulfil, for example safety, are created at EU level and are set out in general terms in these directives. Harmonised European standards are issued with reference to the applied directives and express the essential safety requirements in detailed technical terms.

2. Check the product-specific requirements

It is up to you to ensure that your product complies with the essential requirements of the relevant EU legislation. The use of harmonised standards remains voluntary. You may decide to choose other ways to fulfil these essential requirements. If you don't follow the safety requirements of a standard as it is written you will need to show that your product is as safe, by presenting the relevant documentation.

3. Identify whether an independent conformity assessment is required from a Notified Body

Each directive covering your product specifies whether an authorised third party (Notified Body) must be involved in the conformity assessment procedure necessary for CE marking. This is not obligatory for all products, so it is important to check whether the involvement of a Notified Body is required. These bodies are authorised by national authorities and officially 'notified' to the European Commission and listed on the [NANDO \(New Approach Notified and Designated Organisations\)](#) database.

4. Test the product and check its conformity

If you manufacture a product it is your responsibility to test the product and check its conformity to the EU legislation (conformity assessment procedure). One part of the procedure is, as a general rule, a risk assessment. By applying the relevant harmonised European standards, you will be able to fulfil the essential legislative requirements of the directives.

5. Draw up and keep available the required technical documentation

If you manufacture a product you need to establish the technical documentation required by the directive(s) for the assessment of the product's conformity to the relevant requirements, and for the risk assessment. You must be able to present the technical documentation and EC DoC to the relevant national authorities, if requested.

6. Placing the CE marking on your product and EC Declaration of Conformity

The CE marking must be placed on the product by the manufacturer, or by his authorised representative within the EEA or Turkey.

It must be placed according to its legal format to the product or its data plate. It must be visible, legible and impossible to remove. If a Notified Body was involved in the production control phase, its identification number must also be displayed. It is the manufacturer's responsibility to draw up and sign an 'EC DoC' proving that the product meets the requirements. That's it, your CE-marked product is ready for the market.

Using the CE marking

Once you have satisfied the conformity assessment requirements for CE marking you must attach the CE marking to your product or its packaging. There are specific rules for using the CE marking for your product, as well as rules for the reproduction of the CE marking logo.

In general you should attach the CE marking to the product itself but it may also be placed on the packaging, in manuals and on other supporting literature. Rules covering the use of the CE markings vary depending on the specific EU directive that applies to the product and it is advisable to study the applicable guidance. The following general rules all apply:

- CE markings must only be placed by you - as the manufacturer - or your authorised representative.
- the CE marking cannot be placed on products which are not covered by the relevant European directives.
- when attaching the CE marking, you take full responsibility for your product's conformity with the requirements of the relevant directives.
- you must only use the CE marking to show the product's conformity with the relevant directives.
- you must not place any marking or sign that may misconstrue the meaning or form of the CE marking to third parties.
- other markings placed on the product must not cover up the CE marking.



Member states will ensure they implement the regime governing the CE marking. They will take appropriate action in the event of improper use of the marking and provide for penalties for infringements, which may include criminal sanctions for serious infringements. Those penalties will be proportionate to the seriousness of the offence and constitute an effective deterrent against improper use.

CE marking image rules

Depending on the specifics of the directive that covers your product, you must make sure that:

- the initials 'CE' are in the standard, recognisable form.
- if you reduce or enlarge the size of your marking the letters CE must be in proportion to the standard version.
- the CE marking is at least 5 millimetres - unless a larger minimum dimension is specified in the relevant directive.
- the CE marking is placed onto the product or to its data plate - if this is not possible or not warranted because of the nature of the product, it must be placed onto the packaging and accompanying documents.
- the CE marking is easily visible, readable and permanent.

Keep documentation for CE marking

Please refer to the specific directives and/or regulations, and also our guidance documents.

You must keep certain documentation once you have placed the CE marking onto your product. This information can be requested at any time by the Market Surveillance Authorities to check that a CE marking has been legitimately placed on a product.

The information you must keep will vary depending on the specific directives relevant to your product. You must keep general records of:

- how the product is manufactured
- how the product conforms to the relevant national standards
- addresses of manufacture and storage places
- design and manufacture of the product
- which New Approach Directives apply to the product and how they have been met
- European Community type-examination certificates, if applicable

You should keep the information in the form of a technical file which can be supplied if requested by an enforcement authority.

The manufacturer's Declaration of Conformity

The EC DoC is a document which may be required to accompany a product. In the document the manufacturer, or his authorised representative within the EEA should:

- indicate that the product meets all the necessary requirements of the directives applicable to the specific product.
- make sure it has the name and address of the manufacturer together with information about the product, for example brand and serial number.



The DoC must be signed by an individual working for the manufacturer or his authorised representative, and indicate the employee's function.

CE marking enforcement

There are many bodies that enforce CE marking legislation to prevent misuse of the CE marking and to ensure that product safety is maintained to a high standard.

Enforcement, or market surveillance, is undertaken by nominated public authorities (Market Surveillance Authorities) in each member state, and each state has separate ways of enforcing the legislation once it has been implemented into national law.

Market Surveillance Authorities and processes will vary depending on which directives are applicable to your product. The following bodies, amongst others, are responsible for CE marking enforcement in the UK:

- Trading Standards Services
- the Health and Safety Executive
- the Medicines and Healthcare products Regulatory Agency
- the Vehicle Certification Agency
- the National Measurement Office

If an enforcement body finds your product does not meet CE marking requirements, they will often provide you with an opportunity to ensure it is correctly CE marked. If you fail to comply with this, you will be obliged to take your product off the market. You may also be liable for a fine and imprisonment.

Dean Barnes
Managing Director

A handwritten signature in black ink, appearing to read 'D. Barnes', is placed below the printed name and title.

August 2026