PRIVATE LABEL FROM ZERO

CE Marking Checklist

For first-time importers placing products on the EU market

Most imported products do not need CE marking at all - but if yours does, the mark is a legal declaration you make about your own product, not something a factory grants you. The process in order, plus the red flags that mean stop.

THE SIX STEPS, IN ORDER

- [ ] **1. Identify EVERY applicable directive and regulation - not one, every one**
  A Bluetooth speaker can hit Radio Equipment, EMC, RoHS and battery rules at once. Get this wrong and you test for the wrong thing.
- [ ] **2. Verify product-specific requirements, then find the harmonised standards**
  Horizontal chemicals and environmental law can apply on top. Harmonised standards give you a presumption of conformity.
- [ ] **3. Work out whether a notified body is required**
  Higher-risk products cannot be self-assessed. Search the Commission's NANDO database. This determines your budget and your timeline.
- [ ] **4. Test with an accredited laboratory**
  Read any notified body certificate closely - what it verifies is often narrower than you assumed.
- [ ] **5. Draw up and keep the technical documentation**
  Design documents, test reports, risk assessment - in existence before the first unit is placed on the market, commonly kept ten years.
- [ ] **6. Affix the mark and draw up the EU Declaration of Conformity**
  Your name and address, the product's essential characteristics, the notified body number if any, and a binding signature.

GETTING THE MARK ITSELF RIGHT - ANNEX II, REG. (EC) 765/2008

- [ ] **7. Same vertical dimension for both components, never below 5 mm**
  Unless your specific directive says otherwise.
- [ ] **8. Scale uniformly - the graduated drawing's proportions are binding**
  Squashing it to fit a label is a compliance failure, not a design choice. Use the Commission's official artwork.
- [ ] **9. Visible, legible and indelible on the product**
  If impossible, it goes on the packaging and the accompanying documents.

RED FLAGS - STOP IF YOU SEE THESE

- [ ] **10. The factory certificate is in the factory's name, not yours**
  You cannot use it, and you lose it the day you change supplier. Ask at the point you commission the test.
- [ ] **11. The test report's scope does not match your product**
  Check: which standard, which exact model, what date (nothing over twelve months), lab accredited under ILAC/IAF, and does the tested sample match what you will sell.
- [ ] **12. The certificate number does not resolve in the registry**
  One email to the issuing body. They publish registries precisely so buyers can check.
- [ ] **13. Standards identified after sampling instead of before**
  The mistake that costs months. Find out while you can still change material, component or design.

Not sure which rules apply to your product?

Work through the free Import Compliance Navigator at privatelabelzero.com/tools/import-compliance/ - seven questions, then a checklist built for your specific product and market. The full compliance module, with templates and factory scripts, is part of Private Label from Zero. Join the waitlist at privatelabelzero.com

Scan to open the tool

This checklist is general information based on the author's professional experience, not legal advice. Your obligations depend on your product, its risk class and your role in the supply chain. Verify against the applicable directives and Regulation (EC) No 765/2008.