CUSTOM LABEL REGULATION

USER GUIDE

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Version	Date	Comments	Editor	Approver
V1	05/03/2020	Compulsory elements for white labelling and label customization	Fabien Bibi	
V2	12/07/2023	Added: UKCA section Responsibilities	Fabien Bibi	
V3	29/11/2023	Ready for release.	Fanny WATERLOT	Frédéric CHARLIN

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1 RESPONSIBILITIES

Regarding the legislation the company applying its trademark on the label of the product is considered as the manufacturer and thus has the responsibility for conformity.
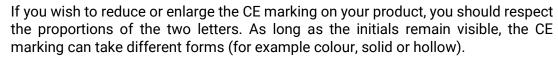
When affixing markings such as CE or UKCA, or affixing FCC or IC number, the company marketing the product takes full responsibility for conformity with the requirements of the relevant legislation. The company applying its trademark has to demonstrate that the product is compliant to technical and security requirements applicable to the product by performing tests or providing tests reports, specification reports, declaration of conformity and providing any other technical documents applicable to the product if any.

2 CE REQUIREMENTS

2.1 CE Marking

The CE marking must be visible, legible and indelible.

The CE marking must consist of the initials "CE", both letters should have the same vertical dimension and be no smaller than 5mm.

If you wish to reduce or enlarge the CE marking on your product, you should respect the proportions of the two letters. As long as the initials remain visible, the CE marking can take different forms (for example colour, solid or hollow).

If the CE marking cannot be affixed to the product itself, you can affix it to the packaging if there is any, or to any accompanying documents. If your product is subject to several EU directives/regulations which require a CE marking to be affixed, the accompanying documents must indicate that your product conforms to all applicable EU directives/regulations.

2.2 WEEE Label

2.2.1 *What is the WEEE label?*

The symbol indicates that the product should not be discarded as unsorted waste but must be sent to separate collection facilities for recovery and recycling. The WEEE marking must appear on any electrical and electronic equipment placed on the EU market.

2.2.2 *Is it mandatory?*

With a few exceptions, most electrical and electronic equipment sold in the EU must bear a specific marking. WEEE label is mandatory for ELA Innovation products found in the following category:

- Small IT and telecommunications equipment (no external dimension more than 50 cm).

2.2.3 *How do you affix the label?*

The beacon must bear:

The symbol of the crossed-out wheeled bin.

Your identification mark, such as brand name or trademark.

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These inscriptions must be printed on the product itself and should be permanent, clearly visible and readable. The label could be printed on the packaging, the instructions or the warranty leaflet and not on the product itself only if the product's size is too small or if its function is affected by the marking.

2.2.4 *What are the costs related to the WEEE label?*

Registration and reporting to the national register are free. However, there are financial obligations related to waste responsibilities, which may vary from one EU country to another.

2.2.5 *Waste responsibilities*

In addition to registering and affixing the WEEE label, your obligations also extend to the end-of-life phase of your products.

2.3 Summary

Label:

CE logo needs to be on the product labeling (must not be smaller than 5 mm).

Trademark and model name/number needs to be stated.

Manufacturer full address (or on packaging /manual if no place on device).

WEEE label mandatory.

Label needs to be in the same location on tag as affixed for ELA Innovation tags.

2.4 Example of Label for EU market

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3 UKCA REQUIREMENTS

The UKCA marking must be clearly visible, legible and indelible when you affix it to the product. It may sometimes be placed on the manuals or on other supporting literature, but this will depend on the specific regulations that apply to the product.

The rules on affixing the UKCA marking are currently the same as for affixing the CE marking.

UKCA markings must only be placed on a product by the manufacturer, an authorized representative (where permitted in the relevant legislation), or if a company is marketing the products under its name or trademark.

When affixing the UKCA marking, the company marketing the product takes full responsibility for conformity with the requirements of the relevant UK legislation.

A product may have additional markings and marks, like the CE marking, as long as they:

- fulfil a different function from that of the UKCA marking

- are not likely to cause confusion with the UKCA marking

- do not reduce the legibility and visibility of the UKCA marking

Both the CE and UKCA markings can be placed on a product so long as neither prevents the other being clearly seen and the requirements of both GB and EU legislation are met.

3.1 Rules for using the UKCA image

You must make sure that:

- if you reduce or enlarge the size of your marking, the letters forming the UKCA marking must be in proportion to the version set out below

- the UKCA marking is at least 5mm in height unless a different minimum dimension is specified in the relevant legislation

- the UKCA marking is easily visible, legible and indelible

The UKCA marking can take different forms (for example, the colour does not have to be solid), as long as it remains visible, legible and maintains the required proportions.

3.2 Summary

Label:

- UKCA logo needs to be on the product labeling (must not be smaller than 5 mm).

- Trademark and model name/number needs to be stated.

- Manufacturer full address (or on packaging /manual if no place on device).

- WEEE label mandatory.

- Label needs to be in the same location on tag as affixed for ELA Innovation tags.

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3.3   Example of Label for EU market

4   FCC REQUIREMENTS

4.1   FCC ID

For certification, the product shall bear a nameplate or label with the FCC Identifier (FCC ID). The FCC ID must always be accessible when using the product. The placement of the FCC ID must be a physical label on the product, unless an e-label is used.

Physical FCC ID labels must be located on the surface of the product, or within a user-accessible non-detachable compartment. The label shall be permanently affixed, permitting the device to be positively identified. The font needs to be readily legible, consistent with the dimensions of the equipment and its label area.

When the device is so small, or for such use that it is impracticable to label with a font size that is four-points or larger (and the device does not utilize electronic labeling), then the FCC ID shall be placed in the user manual, and the FCC ID shall also be placed either on the device packaging or on a removable label attached to the device.

4.2   FCC Logo

Devices authorized under the SDoC procedure have the option to use the FCC logo to indicate compliance with the FCC rules and the logo may be included in the instruction materials or as part of an e-label.

The FCC logo shall only be used on a product that has been tested, evaluated, and found to be compliant in accordance with the SDoC procedures. The use of the FCC logo on the device does not mitigate the requirement to provide a means to uniquely identify the product or to provide the required compliance information statement.

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4.3 Summary

Label:

- FCC ID.

- FCC logo.

- FCC ID also possible to be electronically shown in device.

- Label location on device needs to be shown.

- Label needs to be in the same location on tag as affixed for ELA Innovation tags.

4.4 Example label for US market

5 ISED REQUIREMENTS

5.1 General

In addition to complying with the applicable RSSs and RSP-100, each unit of a product model (i.e. of a radio apparatus) shall meet the labelling requirements set out in this section prior to being marketed in Canada or imported into Canada.

If the dimensions of the product are extremely small or it is not practical to place the label or marking on the product, and if electronic labelling cannot be implemented, the label shall be placed in a prominent location in the user manual supplied with the product, as agreed upon with ISED prior to the certification application. The user manual may be in an electronic format; if it is not supplied to the user, the user manual must be readily available.

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5.2 Labelling of certified products

Every unit of a certified product model, for marketing and use in Canada, shall be identified as per the following requirements:

1. The **HVIN** (Hardware Version Identification Number) and **ISED certification number (IC number)** shall be permanently indicated on the exterior of the product or displayed electronically according to e-labelling requirements as follows:

   1. The **HVIN** and **ISED certification number** may be placed on a label, which shall be permanently affixed to the product

   2. The **ISED certification number** shall be preceded by "**IC:**"

   3. The **HVIN** may be listed or placed with or without any prefix (HVIN:, Model#, M/N:, P/N:, etc.)

   4. The **HVIN** and **ISED certification number** are not required to be adjacent to each other.

2. The **PMN** (Product Marketing Name) must be displayed electronically, or indicated on the exterior of the product or on the product packaging, or in the product literature, which shall be supplied with the product or readily available online.

3. The **PMN**, **HVIN** and **ISED certification number** are permitted to be etched, engraved, stamped, printed on the product, or placed on a label permanently affixed to a permanently attached part of the product.

4. The **PMN**, **HVIN** and **ISED certification number** indicated on any product (including by electronic display) on the Canadian market must be listed in the REL.

5. When the **FVIN** (Firmware Version Identification Number) is the only differentiation between product versions (i.e. the PMN and HVIN remain the same for all versions) listed in the REL within a family certification, the **FVIN** shall be displayed electronically or stored electronically by the product and be easily retrievable.

6. In all cases, the **PMN**, **FVIN**, **HVIN** and **ISED certification number** text shall be clearly legible.

The **PMN**, **HVIN**, **ISED certification number** and applicable **FVIN** are not required to be adjacent to each other.

The certification number is made up of a Company Number (CN) assigned by ISED's CEB (Certification and Engineering Bureau), followed by the Unique Product Number (UPN) assigned by the applicant. The certification number format is:

IC: XXXXXX-YYYYYYYYYY

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The components of the certification number are explained as follows:

1. "IC:" indicates that this is an ISED certification number but is not part of the certification number. XXXXXX-YYYYYYYYYY is the ISED certification number.

2. XXXXXX is the CN assigned by ISED. Newly assigned CNs will be made up of five numeric characters (e.g. "20001") whereas existing CNs may consist of up to five numeric characters followed by an alphabetic character (e.g. "21A" or "15589J").

3. YYYYYYYYYY is the UPN assigned by the applicant, made up of a maximum of 11 alphanumeric characters.

4. The CN and UPN are limited to numeric (0-9) and capital alphabetic (A-Z) characters only. The use of punctuation marks or other symbols, including "wildcard" characters, is not permitted.

5. The HVIN may contain punctuation marks or symbols but they shall not represent any indeterminate ("wildcard") characters.

5.3   Summary

Label:

- ISED certification number need to be shown as –> IC: XXXXX-YYYYYYY.
- Product Marketing Name (PMN).
- Hardware Version Identification Number (HVIN) –> Model#, M/N:, P/N:.
- Can be shown electronically.
- FVIN displayed or stored electronically if applicable.
- Label needs to be in the same location on tag as affixed for ELA Innovation tags.

5.4   Example of Label for the Canadian market

- In the label below, one can find :
- IC number : 20429-BCOINPF1 which is ELA Innovation IC number.
- PMN: BLUE COIN.
- HVIN : IDF10XXX which represents a unique identification for the single product BLUE COIN.

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6 BLUETOOTH SPECIAL INTEREST GROUP (SIG)

6.1 General

To brand (or re-brand) and sell a *Bluetooth®* product, your company must join the Bluetooth Special Interest Group (SIG) and complete the Qualification process.

ALL Bluetooth® Products Must Be Qualified

- Product qualifications cannot be inherited from your supplier. You must complete the qualification of your product for yourself.
- You can only qualify your products under your member company's account and only by completing the Bluetooth Qualification Process.
- It may be possible to complete product qualification by adding the product as a new model to one of your existing qualifications. Or you may need to create a new qualification which may require testing to be completed.

Bluetooth products must be qualified on or before the date that you begin to sell or distribute the product. The details you provide for each Bluetooth product listing must exactly match the product, its packaging markings, and marketing materials. Products that appear to have not completed the Bluetooth Qualification Process may be impounded by customs authorities and will be subject to Bluetooth SIG enforcement actions.

If you are a retailer or supplier selling or distributing another organization's qualified Bluetooth product, and you are not adding any logos, branding, or representing the product as your own, you do not need to complete the Qualification Process for the product. However, you should ensure that the product has been properly qualified.

A member choosing not to use the Bluetooth trademarks must still be compliant with the Bluetooth Patent & Copyright License Agreement.

6.2 Bluetooth logo and trademarks

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6.3 Summary

Companies branding the product must:

- Be members of the Bluetooth SIG.

- List the product once for their own company/brand name.

Label:

- The Bluetooth logo needs to be present on the label once listing performed.

- Label needs to be in the same location on tag as affixed for ELA Innovation tags.

6.4 Example of Label containing the Bluetooth trademark

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