



UAE Steel Regulation - Guidance

This document sets out the Guidance for the implementation of *Cabinet Decision No. 121/2023 on the UAE Scheme for Steel Bars for Concrete Reinforcement*.

Issue

1. The UAE federal government is committed to delivering on its priorities of supporting UAE businesses and industry and decarbonisation of the built environment. The UAE steel sector plays an important role in our economy, providing high quality steel products and helping to deliver our country's homes, villas, and infrastructure. The manufacturing of steel products supports thousands of high skilled, well-paid jobs in steel production and thousands of jobs in upstream supply chains across many important parts of the UAE economy. Government authorities are an important buyer of steel, procuring it to build critical infrastructure such as our railways, roads, buildings, defence equipment, schools and hospitals.

Aim

2. The aim of the Regulation is to ensure that all constructional steel products placed on the UAE market are safe, and that the public can be confident that products used to construct our built environment will perform as intended. The product information will be provided in digital form, be fully traceable to the product, and enable the application of the ECAS mark. The UAE Regulation will level the playing field and will be the first to require Digital Product Passports and enable a fully digitised supply chain.

Introduction

3. To ensure that in-scope constructional steel products placed on the UAE market are safe a rigorous conformity assessment process has been established which will result in certified products being identified by the application of the ECAS mark. This world-leading Regulation will also be the first to establish well-functioning information flows, via digital means, to ensure that coherent, reliable, and transparent information about steel construction products performances is available along the supply chain.
4. This will increase transparency and improve efficiency in terms of information transfer. Ensuring digital access to comprehensive information about construction products will contribute to the digitalisation of the construction sector altogether, making the supply chain fit for the digital age. Moreover, providing access to reliable product information will also mean that manufacturers and other actors in the steel supply chain will not contribute to each other's non-compliance with legal obligations.



5. Manufacturers will be required to complete a declaration of performance and issue a Digital Product Passport, which includes product performance and environmental performance data, for all in-scope steel products to be placed on the market, put in place factory production controls, and follow the specified system of assessment and verification of constancy of performance (AVCP) to ensure that the claimed performance is consistently met. The manufacturer will be required to prepare and make available the product test information for each batch of product placed on the market and an independently verified Environmental Product Declaration (EPD) to EN 15804 in the form of a Digital Product Passport. The Cloud-based platform to store the Digital Product Passports shall be maintained by the Notified Body.

Dissemination and scope

6. Cabinet Decision No. 121/2023 applies to all UAE, including free zones, and non-UAE based manufacturers of in-scope steel products.
7. This Guidance will be made available on the Ministry of Industry and Advanced Technology (MoIAT) website and updated from time to time.

Timing

8. Manufacturers of in-scope products should apply the provisions of the Cabinet Decision No. 121/2023 by 27 November 2024.

Action

9. Cabinet Decision No. 121/2023 supports the implementation of the following policy landscape:
 - a) Make it in the Emirates;
 - b) UAE Industry 4.0;
 - c) Green manufacturing;
 - d) Green public procurement.

Application, assessment and verification of constancy of performance (AVCP) and continuous surveillance

10. For a manufacturer to achieve approval to the Regulation the following main elements are to be followed:
 - a) Application to be submitted via the official MoIAT website.
 - b) The application will be assigned to a Notified Body.
 - c) Notified Body undertakes the assessment process, which includes Initial inspection of the manufacturing plant, the factory production control (FPC) system to ISO 9001, verification of the performance of the product and the use of the static and dynamic QR codes.



- d) Upon satisfactory completion of stage 3 a certificate of conformity will be issued by MoIAT on the basis of documented, permanent and internal control of production in the manufacturing plant, in accordance with the Regulation.
- e) Continuous surveillance, assessment and evaluation of the factory production control and periodic audit testing of product samples taken before placing the product on the market shall be performed by the Notified Body.
- f) A Certificate of Conformity is granted to the Applicant who satisfactorily fulfils the requirements, authorising the use of the Emirates Conformity Assessment Scheme (ECAS) mark on their certified products.
- g) Manufacturers of in-scope products will be required to submit a declaration of performance to the Notified Body and make available a Digital Product Passport on the Notified Body's Cloud based platform. The Digital Product ID, also known as the Digital Product Passport (DPP), encompasses the requisite details stipulated by the material test certificate. [Refer to Annex 4 of the Regulation]
- h) Each Notified Body shall periodically report to MoIAT a summary of all the Digital Product Passports maintained on their Cloud based platform via electronic means.

Frequently asked questions

- 1) **In-scope Reinforcing steel products** – The following standards are in-scope of the Regulation: BS 4449 2005, ASTM 615/615M, ASTM 706 and ISO 6935-1.
- 2) **Billets** - Where billets or semi-finished product are sourced externally the supplier shall provide a valid certificate of conformity. The billet shall be accompanied by a declaration of conformity to relevant standards and/or Customer specifications, including the chemical composition of the billet and a statement of radioactivity screening. The origin and chemical composition of the billets shall be available from the Notified Body's Cloud based platform. The procedures of the billet supplier shall maintain the traceability of the billets to a batch and how they are tracked.
- 3) **Fabric standards (welded wire mesh)** - Fabric standards (welded wire mesh) that use steel products listed in 1 above are also in-scope of the Regulation. The following standards are in-scope of the Regulation: BS 4483, ASTM 1064 and ISO 6935-2.
- 4) **Digital Product ID (Digital Product Passport (DPP))**: A digitised record of Product testing data, comprising Product specifications, grade, shape, diameter, cast/heat/batch/lot number, chemical analysis, and mechanical properties, as applicable, for each market-released Batch of the Product. Access to this information is facilitated through scanning a Dynamic Quick Response (QR) code. The Digital Product ID, also known as the Digital Product Passport (DPP), encompasses the requisite details stipulated by the material test certificate. Refer to Annex 4 of the Regulation for further information.
- 5) **Product traceability** – it is necessary to establish well-functioning information flows via digital means using the dynamic QR code to ensure that coherent and transparent information about the in-scope products performances is available along the supply chain. This will increase transparency and improve efficiency in terms of information transfer. Ensuring digital access to comprehensive information about the in-scope products will contribute to the digitalisation of the construction sector altogether, making the supply chain fit for the digital age. Moreover, providing access to reliable and durable information will also mean that economic operators and other actors



would not contribute to each other's non-compliance with the legal obligations of the Regulation.

6) Environmental Product Declarations (EPDs)

- a. General – the Environmental Product Declaration (EPD) shall be developed in accordance with the standard (EN 15804) and shall be certified by an independent entity. The independently certified EPD may be provided by the Notified Body or another entity.
- b. Applicability of EPDs:
 - i. Integrated mills – for finished product and billet only sales - manufacturers of carbon steel bars for concrete reinforcement and billets utilized in the production of rebar and coils for concrete reinforcement shall furnish an Environmental Product Declaration (EPD) in accordance with the standard (EN 15804), certified by an independent entity. The maximum period of validity of the EPD will be 3 years.
 - ii. Re-rollers – the re-roller shall provide the EPD from each billet supplier for each batch of finished product placed on the market by 1 July 2025. In addition, the re-roller will be required to have an Environmental Product Declaration (EPD) in accordance with the standard (EN 15804), for their own operations, certified by an independent entity. The period of validity of the EPD for a re-roller will be 3 years.
 - iii. Fabric (welded wire mesh) manufacturers will be required to maintain traceability of the finished product to the feedstock rod and each rod feedstock supplier shall have an Environmental Product Declaration (EPD) in accordance with the standard (EN 15804), certified by an independent entity by 1 July 2025. For clarity, the Fabric (welded wire mesh) manufacturer does not require an EPD for their own operations.

- 7) **Unannounced audits** – the Notified Body shall undertake unannounced audits when required. The approved company shall give representatives of the Notified Body access during normal working hours to sites in which work, the subject of the Certificate of Conformity, is being carried out for the purpose of examination of materials, processes, finished articles, methods of test, records, details of internal audits and systems.
- 8) **Customs clearance** - Customs authorities in each of the UAE Emirates shall have access to the relevant information from the MoIAT conformity hub to verify that the product presented for clearance can be evidenced that it satisfies the Regulation and the application of the ECAS mark.
- 9) **Product identification (Rolling Mark)** - The rolling mark shall be mutually agreed upon with the Designated Authority/Notified Body. The Notified Body is responsible for keeping a register of rolling mill marks issued to manufacturers. This mark shall be repeated at intervals not exceeding 1.5m. The Notified Body may agree a transition period with the approved manufacturer for the use of the rolling mark.
- 10) **Certificate of Conformity** - When the assessment has been successfully completed the Notified Body shall make a recommendation to MoIAT to issue a Certificate of Conformity in accordance with Cabinet Decision No. 121/2023 which entitles the manufacturer to affix the ECAS Mark.



- 11) **Affixing the ECAS Mark and labelling** - The manufacturer or his authorised representative established in the UAE is responsible for affixing the Emirates Conformity Assessment Scheme (ECAS) Mark.
- 12) **On-going projects using in-scope products** – The Regulation shall apply to in-scope products placed on the market with effect from 27 November 2024.
- 13) **Application process** – Refer to the flowchart in Annex 2 of this Guidance.

Implications

Importers and distributors

11. In the Regulation an assumption was made that manufacturers sell their products to the end user. In reality, a manufacturer will put their product into a supply chain, not knowing the product's destination or end use.
12. The Regulation adds responsibilities to importers and distributors who must assure themselves that the manufacturer has undertaken all that is required. The importers or distributor's name and contact details must appear on the product labelling or commercial documents when the product is first placed on the market (refer to Article 7 of the Regulation).
13. This responsibility may even extend to sample testing and working with enforcing authorities. Before making a construction product available on the market, distributors must ensure that the in-scope steel product bears the ECAS marking and is accompanied by the correct product information in digital form. Distributors must also ensure that the manufacturer and the importer have complied with their requirements.

Competent Authorities

14. Federal or local government agencies, vested with the authority necessary for the implementation of any provisions specified in the Regulation. Compliance with the Regulation should be adopted by these Government Authorities to ensure that the use of in-scope steel products bearing the ECAS marking properly used.
 - a. Dubai Municipality
 - b. Abu Dhabi Municipality
 - c. Al Ain Municipality
 - d. Sharjah Municipality
 - e. Fujairah Municipality
 - f. Ras Al Khaimah Municipality
 - g. Umm Al Quwain Municipality
 - h. Ajman Municipality
 - i. Customs authorities in each of the UAE emirates and free zones



Service providers

Notified Bodies

15. Notified bodies are the product certification bodies which are competent to carry out the conformity assessment tasks. Such bodies are first approved by an UAE based accreditation Body to ISO 17065 to carry out certain designated tasks, and then notified by MoIAT. Hence, they are called 'notified bodies'. They are referred to as 'notified bodies' in this guidance note.
16. Notified bodies are required to participate in the 'Group of Notified Bodies' (GNB), with MoIAT to discuss practical implementation matters to achieve a consistent approach to the tasks required by the Regulation.

Contact

17. Should you require any further assistance or clarification, please do not hesitate to contact us via email at customercare@moiat.gov.ae or call us on (600 565554) and one of our customer service representatives will be happy to assist you.



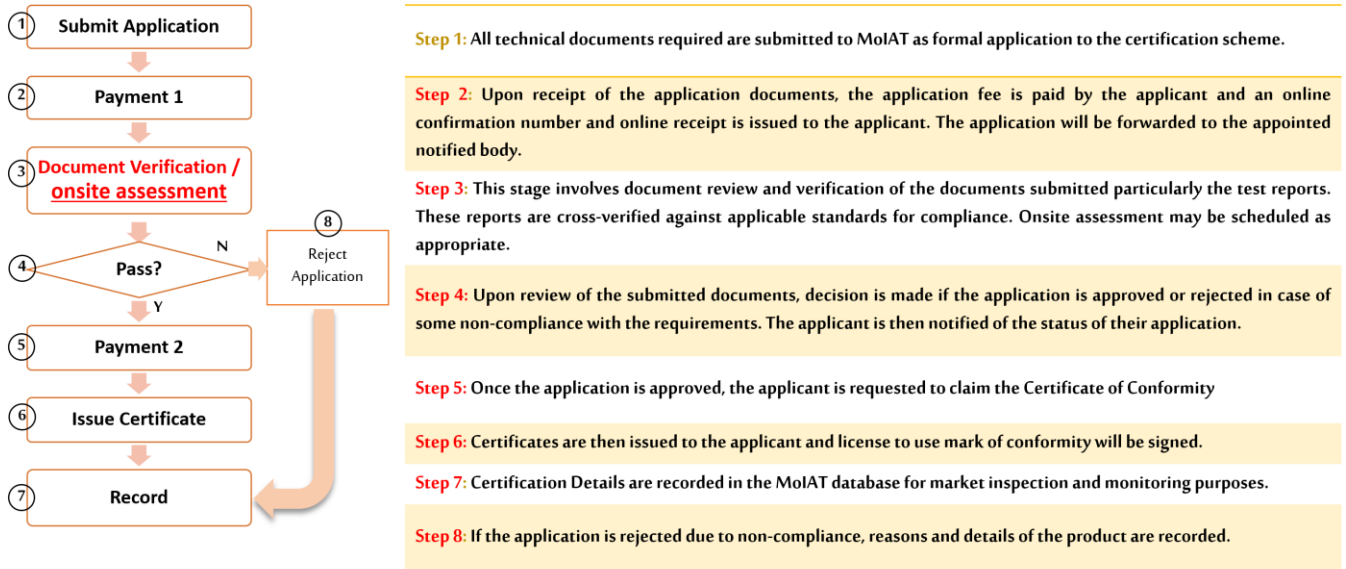
Annex 1: Key definitions

| Term | Meaning |
|--|--|
| Emirates Conformity Assessment Scheme (ECAS) | The scheme, issued by the Ministry, dedicated to verifying compliance of a Product with the prescribed standards as outlined in Approved Standard Specifications. This verification is achieved, directly or indirectly, through distinct procedures conducted by the Ministry, including but not limited to inspection, testing, examination, and auditing, with the aim of granting certificates of conformity. |
| Authority | The entity officially recognised by the Ministry to conduct conformity assessment procedures in specific domains outlined by the Ministry, in accordance with the prevailing legislation in this regard. The Designated Authority is a Notified Body. |
| Certificate of Conformity/Certificate: | The official document issued by the Ministry, attesting to the compliance of the Product or any specific Batch therewith, in accordance with the stipulated requirements of the Approved Standard Specifications or technical regulations, commonly referred to as the "Mandatory Standard Specification". |
| Manufacturer | Any natural or legal person who manufactures a construction product or who has such a product designed or manufactured and markets that product under their name or trademark. |
| Applicant | The producer, importer, agent, store, any major or sub-distributor whose activities affect the characteristics of the Product, or any commercial or legal representative responsible for importing the Products. |
| Digital Product ID | A digitised record of Product testing data, comprising Product specifications, grade, shape, diameter, lot number, chemical analysis, and mechanical properties, as applicable, for each market-released Batch of the Product. Access to this information is facilitated through scanning a Dynamic Quick Response (QR) code. The Digital Product ID, also known as the Digital Product Passport (DPP), encompasses the requisite details stipulated by the material test certificate. |
| Static Response Code (QR) | A Quick Response code designed to present Product data and validate the authenticity of the Certificate of Conformity. |
| Response Code (QR) | A Quick Response code designed to showcase Batch-specific data and facilitate verification of the Digital Product ID. |
| Integrated mill | A manufacturer of reinforcement bar, coil or rod that has primary steelmaking facilities to produce molten steel, continuously cast billets, and/or rolling of billets. |
| Re-roller | A re-roller is a company that processes steel billets (a semi-finished product) received from an external supplier and re-rolls the billets into reinforcing bars and/or coils. |
| Fabric (welded wire mesh) manufacturer | A fabric (welded wire mesh) manufacturer is a company that sources plain round wire rod externally for cold rolling into plain and/or ribbed bar or coil. |

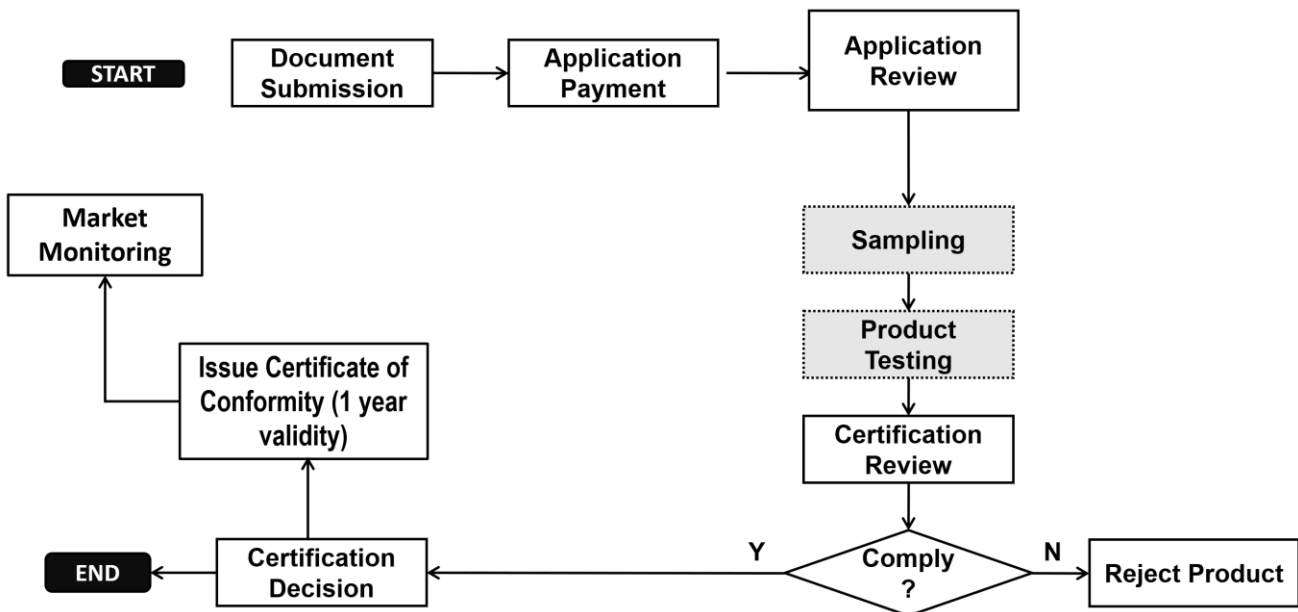


Annex 2: Application process flowchart

Conformity Assessment Schemes (Module B and Module H)



Procedure for ECAS Application





Procedure for EQM Application

