The EU Selling Compliance Kit (GPSR Edition)

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Start here

If you sell physical consumer products to customers in the EU from outside the EU, the General Product Safety Regulation (GPSR) already applies to you, and this kit gets you to a defensible position in 7 days.

Who this kit is for

- Shopify and other own-site stores that ship to EU addresses
- Dropshippers using suppliers or agents in China, the US, the UK or elsewhere
- Sellers on Amazon, eBay or Etsy who list in EU marketplaces
- Small brands that put their own name or logo on products made by someone else

How to use it

1. Read sections 1 to 3 once (about 30 minutes). They tell you which rules apply to you.
2. Work through the 7-day action plan in section 10. Each day takes 30 to 90 minutes.
3. Copy the templates in section 11 into your own documents and fill them in per product.

What this kit is not. It is an educational guide based on the official EU texts listed in section 12. It is not legal advice. For high-risk products (toys, cosmetics, electrical goods, children's products, food-contact items) other EU laws apply on top of GPSR; use this kit as a starting point and confirm the specific rules with a compliance professional.

1. GPSR in 10 minutes

Regulation (EU) 2023/988, the General Product Safety Regulation, has applied in every EU country since 13 December 2024 and covers almost every non-food consumer product sold to EU consumers, online or offline.

What changed for online sellers

- **An EU-based responsible person is required.** A product can only be placed on the EU market if an economic operator established in the EU is responsible for it. If your manufacturer is outside the EU, someone in the EU must take that role.

- **Your listing must show safety and traceability information.** Every online offer must clearly show the manufacturer, the responsible person, product identification with a picture, and any warnings.
- **Documentation must exist and be kept for 10 years.** The manufacturer must carry out a risk analysis and keep technical documentation for 10 years after the product is placed on the market.
- **Accidents must be reported.** Serious accidents are notified to the authorities through the EU Safety Business Gateway.
- **Recalls follow a set format.** A recall notice must start with the headline "Product safety recall", and consumers must be offered at least two remedies out of repair, replacement and refund.

It is a regulation, not a directive. It applies directly and in the same way in all EU countries; no national version needs to exist for it to bind you.

Penalties are set by each EU country. The regulation requires them to be effective, proportionate and dissuasive, so amounts vary. Germany, for example, sets fines of up to EUR 100,000. In practice the faster consequences for small sellers are blocked parcels at customs, listings removed by marketplaces, and payment or ad accounts flagged after complaints.

Products already on the market before 13 December 2024 that complied with the old rules may still be sold, but every new offer you publish today must meet the new information requirements.

2. What role you play

Your obligations depend on your role in the supply chain, and most small online sellers are either a distributor or, without realising it, a manufacturer.

Your situation	Your role under GPSR	What it means for you
You sell products under your own brand name or logo, even if a factory makes them	Manufacturer	Full duties: risk analysis, technical documentation, labelling, complaints register, accident reporting
You change a product in a way that affects its safety (new battery, new material, new intended use)	Manufacturer	As above, for the modified product

Your situation	Your role under GPSR	What it means for you
You are established in the EU and bring products in from outside the EU	Importer	Check the manufacturer did its job, add your own details, keep documents available, can act as responsible person
You resell someone else's branded product without changing it	Distributor	Check required information is on product and listing before selling, act on safety problems
You store, pack and ship products in the EU for other businesses	Fulfilment service provider	Can become the responsible person if no other EU operator exists
You dropship from a non-EU supplier straight to EU customers, under the supplier's brand	Usually distributor	You still need an EU responsible person for every product you list
You dropship generic products under your own store brand	Usually manufacturer	You carry the manufacturer duties for those products

The key question for dropshippers. When both the manufacturer and you are outside the EU, and the customer imports the parcel, there is no EU importer in the chain. Someone in the EU must still be the responsible person, so you need an authorised representative or an EU fulfilment provider who takes that role.

Check your own case. Write down, for each product, who manufactures it, whose brand is on it, where it ships from, and who in the EU is named on it. Section 10, day 1 walks you through this.

3. The EU responsible person

Every product you sell into the EU needs one named economic operator established in the EU who answers to the authorities for it.

Who can be the responsible person, in this order

1. A manufacturer established in the EU
2. An importer, if the manufacturer is outside the EU
3. An authorised representative, with a written mandate from the manufacturer to perform the tasks
4. A fulfilment service provider in the EU, if none of the above exists

What the responsible person must do

- Verify that the technical documentation exists and can be given to authorities
- Provide information and documents when an authority asks
- Inform authorities when a product presents a risk
- Cooperate on corrective action and risk reduction
- Check regularly that products match the documentation and labelling rules, and keep evidence of those checks
- Put their name and contact details on the product, its packaging or an accompanying document
- Report accidents through the Safety Business Gateway without undue delay

How to choose a provider. Many companies now offer "EU responsible person" or "authorised representative" services for a monthly or per-product fee. Before you sign, ask each one the questions below and keep the answers.

- [ ] Where are you established, and what is the exact legal name and address you will put on my products?
- [ ] Which product categories do you cover, and which do you refuse?
- [ ] Will you sign a written mandate with the manufacturer, or with me? (A mandate must come from the manufacturer; if you are the brand owner, you are the manufacturer.)
- [ ] What documentation do you need from me before you accept a product?
- [ ] How often will you check conformity, and what evidence do you keep?
- [ ] What happens, and what does it cost, if an authority contacts you about my product?
- [ ] What is your notice period, and what happens to my listings if the contract ends?

Red flags. A provider who only sells you an address label, never asks for documentation, or cannot explain the tasks above is not doing the job the regulation describes, and the risk stays with you.

4. Your online listing checklist

Every product page that EU customers can buy from must clearly and visibly show four things, and this is the part buyers, marketplaces and authorities check first.

- [ ] **Manufacturer:** name, registered trade name or trademark, plus a postal address and an email or web contact
- [ ] **EU responsible person:** name, postal address and electronic contact, if the manufacturer is not established in the EU
- [ ] **Product identification:** a picture of the product, its type, and any other identifier such as model, batch or SKU

- [ ] **Warnings and safety information:** in a language consumers in the country of sale can easily understand

On Shopify and other own-site stores. Add a section called "Product safety information" to every product page. The simplest way is a fixed block at the end of the product description; a cleaner way is a product metafield shown in a tab or collapsible row by your theme, so you fill it once per product. Make sure it is visible without logging in and before checkout.

On marketplaces. Amazon and eBay have dedicated fields for manufacturer and responsible person details; fill those rather than only typing them into the description. See section 9.

Example block (replace every detail with your own):

```
Product safety information
Manufacturer: Shenzhen Example Lighting Co., Ltd., 88 Example Road, Shenzhen,
China, sales@example-lighting.cn
EU responsible person: Example EU Compliance GmbH, Musterstrasse 1, 10115
Berlin, Germany, gpsr@example-eu.com
Product: LED desk lamp, model DL-200, item no. 42017
Warnings: Not a toy. Keep away from children under 3 years. Do not cover the
lamp while in use.
```

Language. Each EU country decides which language its consumers need. If you sell across the EU from one English store, translate the warnings for your main destination countries, and show them in the listing and in the parcel.

5. Product, packaging and traceability

The same details that appear in your listing must also travel with the physical product, so an authority or a customer can trace it without visiting your website.

- [ ] **A type, batch or serial number** (or another identifier) on the product, or on the packaging or an accompanying document if the product is too small
- [ ] **Manufacturer name and contact details:** postal and electronic address
- [ ] **EU responsible person name and contact details** on the product, packaging or accompanying document
- [ ] **Instructions and safety information** in the language of the country of sale, where the product needs them to be used safely
- [ ] **No extra labels that hide** mandatory information required by EU law

When instructions are not needed. Warnings and instructions are only required where the product cannot be used safely without them. A plain cotton T-shirt needs no warning text; a heater, a lamp or a children's product does.

For dropshippers. You do not touch the parcel, so the supplier must apply these details for you. Send the supplier information request in section 11 before you list a product, and ask for photos of the label and packaging as proof.

Keep evidence. Save the label photos and the supplier's written confirmation in a folder per product. That folder becomes part of your documentation in section 7.

6. Supplier due diligence

Before you list a product for EU customers, get six things from your supplier in writing; a supplier who cannot provide them is a compliance risk you inherit.

What to request	Why you need it	Acceptable proof
Legal manufacturer name, postal and email address	Required on listing and product	Business licence or official company page
Name and address of the EU responsible person, if they have one	Required on listing and product	Written confirmation plus a label photo
Model, type or batch identifier	Traceability	Label photo
Test reports or certificates for the product category	Supports the risk analysis	PDF reports from a named laboratory
Warnings and instructions, in English and EU languages	Safe use and language rules	The actual insert or manual
Confirmation that they will notify you of safety problems and recalls	You must act on them	Written statement in your chat or email

Red flags

- The supplier sends the same test report for unrelated products, or the report names another company or model
- No manufacturer name on the product or packaging at all
- "CE" marks or certificates for products that do not need them, or certificates without a laboratory name
- The supplier refuses to put any contact details on the parcel

If a supplier cannot provide it. Pause EU sales of that product, ask your dropshipping agent to source an alternative supplier, or block EU shipping for that product in your store settings until the gap is closed.

7. Risk analysis and technical documentation

If you are the manufacturer (including your own brand on a factory product), you must analyse each product model's risks before selling it and keep that file up to date for 10 years.

What the file contains, per product model

1. A general description of the product and its intended use
2. Its essential safety characteristics (materials, power source, small parts, heat, sharp edges, chemicals)
3. The risks you identified and how each one is addressed (design, warnings, instructions, testing)
4. The European standards or national requirements you applied, with the test reports that support them

How long and for whom. Keep it for 10 years after the product is placed on the market, and be ready to send it to an authority on request, directly or through your responsible person.

Distributors and dropshippers selling someone else's brand do not write this file, but should check that it exists. Ask the supplier or the responsible person to confirm it in writing.

Who the analysis must consider. Think about everyone who could reasonably use the product, especially children, older people and people with disabilities, and foreseeable misuse, not only the ideal user.

Use the risk analysis template in section 11. A simple product often fits on one page.

8. Complaints, accidents and recalls

When something goes wrong, GPSR expects a fast, documented response: log complaints, report serious accidents through the Safety Business Gateway, and run recalls in the official format.

Complaints register (manufacturers). Keep an internal register of safety-related complaints, recalls and corrective actions. Delete personal data from it five years after each entry. Fields are listed in section 11.

Accidents. An accident is an event linked to using the product that causes death or serious harm to someone's health, permanent or temporary.

1. Notify the authorities of the EU country where it happened through the Safety Business Gateway, as soon as possible.
2. Include the product type and identification number, and the circumstances if you know them.
3. If a distributor or importer tells you about an accident, report it yourself or instruct them to.

Distributors who find a problem must tell the manufacturer or importer, make sure corrective action happens (up to withdrawal or recall), and notify the authorities through the Safety Business Gateway.

Recall notices must begin with the headline "Product safety recall" and include:

- [ ] Product name, picture and identification details
- [ ] A clear description of the hazard
- [ ] What consumers should do, starting with "stop using the product" where relevant
- [ ] The remedies offered
- [ ] A free phone number or online service for questions

Remedies. Offer at least two out of repair, replacement and refund, free of charge and without shipping costs for the consumer. Offer only one if the others are impossible or disproportionately costly. If repair or replacement is not done in a reasonable time, the consumer is entitled to a refund.

Tell affected buyers directly. Where you have their contact details, notify them directly and without undue delay; otherwise publish the notice as widely as you can.

9. Marketplaces: Amazon, eBay, Etsy

Marketplaces now have their own GPSR duties, so they ask you for safety data up front and remove listings fast when it is missing.

What marketplaces must do, and what it means for you

Marketplace duty	What you will see
Show manufacturer, responsible person, product identification and warnings for every listing	Mandatory fields for manufacturer and EU responsible person; listings without them are blocked or suppressed

Marketplace duty	What you will see
Let traders submit safety and traceability information, and a self-certification that they only offer compliant products	A declaration you tick when listing or in account settings
Act on orders from national authorities within 2 working days	Listings taken down quickly after an authority request, often before you are contacted
Handle third-party safety notices within 3 working days	Listings removed after complaints from competitors or consumers
Larger marketplaces: suspend traders who often offer unsafe products, after a warning	Account warnings, then suspension

Practical tips

- On **eBay**, use the regulatory contacts section to add manufacturer and responsible person details, individually or in bulk.
- On **Amazon**, add the responsible person through the compliance tools in Seller Central and link it to your products, rather than typing it into the description.
- On **Etsy** and other marketplaces, look for the product safety or compliance fields in the listing editor, and keep the same block from section 4 in the description as a fallback.
- Keep the details identical everywhere: listing fields, description, label and packaging. Mismatches are a common reason for suppressed listings.

10. Your 7-day action plan

One focused task a day for a week takes a typical store with up to 30 products from exposed to documented.

Day 1: Map your products (60 minutes)

- [ ] List every product you sell to EU customers in a spreadsheet
- [ ] For each, note the manufacturer, whose brand is on it, where it ships from, and your role (section 2)
- [ ] Mark high-risk categories: toys, children's products, electrical, cosmetics, food-contact

Day 2: Send supplier requests (45 minutes)

- [ ] Send the supplier information request (section 11) for every product
- [ ] Set a 5-day deadline for answers

Day 3: Choose your EU responsible person (90 minutes)

- [ ] Check whether your suppliers already have one
- [ ] Shortlist 2 to 3 providers for the gaps and send them the questions in section 3

Day 4: Fix your listings (60 to 90 minutes)

- [ ] Add the product safety information block (section 4) to your top 10 products first
- [ ] Fill marketplace fields where you sell on Amazon, eBay or Etsy

Day 5: Labels and inserts (45 minutes)

- [ ] Ask suppliers for label and packaging photos
- [ ] Order translated warnings for your main EU countries where needed

Day 6: Documentation (60 minutes)

- [ ] For own-brand products, complete the risk analysis template per model
- [ ] Create one folder per product with reports, label photos and supplier confirmations

Day 7: Processes (45 minutes)

- [ ] Set up the complaints log (section 11)
- [ ] Save the Safety Business Gateway link and the recall notice skeleton
- [ ] Pause EU sales of any product still missing information

After week 1. Repeat days 4 to 6 for each new product before you list it for EU customers.

11. Templates

Copy each template into your own document or email and replace everything in square brackets.

Template 1: Supplier information request

```
Subject: EU product safety information for [product name / SKU]

Hello [supplier name],

We sell [product name, model] to consumers in the European Union. Under the
EU General Product Safety Regulation (EU) 2023/988 we need the following
before we can continue selling it there:

1. Legal manufacturer name, postal address and email address
2. Name, postal address and email of your EU responsible person, if you have
one
3. Model, type or batch number as printed on the product
4. Test reports or certificates for this product (laboratory name and date)
5. Warnings, instructions and safety information supplied with the product
6. Photos of the product label and the packaging showing items 1 to 3
7. Your confirmation that you will inform us of any safety issue or recall

Please reply by [date]. Without this information we will have to stop selling
this product in the EU.

Thank you,
[Your name], [store name], [email]
```

Template 2: Product safety information block for listings

```
Product safety information
Manufacturer: [legal name], [postal address], [email or website]
EU responsible person: [legal name], [postal address in the EU], [email]
Product: [product type], model [model], item no. [SKU or batch]
Warnings: [warnings in the customer's language, or "No special warnings
required for safe use"]
```

Template 3: Risk analysis, one per product model

Field	Your entry
Product and model	[ ]
Intended use and users	[ ]
Foreseeable misuse	[ ]
Vulnerable users (children, elderly, disabled)	[ ]
Materials and power source	[ ]

Field	Your entry
Identified hazards (e.g. small parts, heat, sharp edges, chemicals, electrical)	[ ]
How each hazard is controlled (design, warning, instruction, test)	[ ]
Standards or requirements applied	[ ]
Test reports attached (laboratory, date)	[ ]
Reviewed by and date	[ ]
Next review date	[ ]

Template 4: Complaints and incidents log

Date	Order or customer reference	Product and batch	What happened	Safety-related (yes/no)	Action taken	Reported to authority (yes/no, date)	Closed on
[]	[]	[]	[]	[]	[]	[]	[]

Template 5: Recall notice skeleton

```
Product safety recall

Product: [name], model [model], batch [batch numbers], sold [date range] via
[store/marketplace]
[product picture]

Hazard: [plain description of the risk, e.g. "the charger can overheat and
cause burns"]

What to do: Stop using the product immediately. [Further steps.]

Remedy: We offer [two of: free repair / free replacement / full refund], with
no shipping costs for you.

Contact: [free phone number or online form], [hours]
```

Template 6: Responsible person shortlist

Provider	Country	Categories covered	Monthly or per-product fee	Written mandate	Documentation they require	Notes
[ ]	[ ]	[ ]	[ ]	[ ]	[ ]	[ ]

12. Sources and disclaimer

This kit is based on the official EU texts below, reviewed in November 2026; only the legislation itself has legal force.

- Commission Notice: Guidelines for businesses on the General Product Safety Regulation (EU) 2023/988, C/2025/6233, Official Journal of the EU, 21 November 2025
- Regulation (EU) 2023/988 on general product safety, applicable from 13 December 2024
- Regulation (EU) 2019/1020 on market surveillance, Article 4 (responsible person)
- Taylor Wessing: Understanding the updated product safety regime, for national penalties
- eBay: How to comply with GPSR, for marketplace fields

Disclaimer. This guide is for general education. It is not legal advice and does not create a client relationship. Rules for specific product categories (toys, electrical equipment, cosmetics, medical devices, food-contact materials and others) add further requirements. Check your situation with a qualified compliance professional before relying on it for high-risk products.

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