

Guide to the GPSR (General Product Safety Regulation)

Strategic Guideline for Consumer Protection, Risk Assessment,
Traceability and Legally Compliant Market Conformity according to
Regulation (EU) 2023/988

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Important Information for International Manufacturers, Importers, Authorized Representatives and Online Economic Operators (E-Commerce)

1. What is the GPSR and why does it concern you?

The GPSR (General Product Safety Regulation – Regulation (EU) 2023/988) is the fundamental, union-wide law for ensuring the safety of consumer products in the European internal market. It replaces the old General Product Safety Directive (2001/95/EC) and transforms European product safety law into a regulation that applies directly in all EU Member States.

In contrast to specific CE directives, which only cover certain product classes (such as electronics or toys), the GPSR functions as a comprehensive legal safety net.

The iron core principle of the GPSR:

No economic operator may place a product on the market or make it available in the EU that is not safe.

This applies to all non-food consumer products (B2C), regardless of whether they carry CE marking or not.

The scope therefore includes:

Products without CE obligation:

For example conventional furniture, clothing, textiles, jewelry, sports goods, hand tools, household goods.

Products with CE obligation (supplementary):

For electronics, toys or machinery, the GPSR additionally applies in all areas not already covered by specific CE legislation (for example regarding extended obligations in online trade, traceability and recall management).

The critical reality for e-commerce:

The GPSR was specifically created for the digital age. It closes regulatory gaps in distance selling (online shops, marketplaces such as Amazon, eBay, Temu, Shein) and obliges traders to an unprecedented level of transparency and documentation even before the actual sale.

2. What consequences arise in case of non-compliance with the GPSR?

Market surveillance authorities of EU Member States have been equipped with far-reaching powers through the GPSR. Since the focus is extremely strong on online trade, monitoring takes place in a highly automated and digital manner. Violations trigger drastic sanctions:

Automated marketplace suspensions (immediate stop):

E-commerce platforms are legally obligated to immediately delete listings (ASINs) if mandatory GPSR information (such as the EU responsible person) is missing in the listing.

Official recall orders:

If a product is classified as unsafe or fundamental labeling errors exist, authorities order a sales stop as well as a recall directly from the end consumer. The trader bears all costs for return, replacement or refund.

Customs border blocks:

Customs checks shipments on a random basis for the presence of the EU responsible person and the clear product ID. If these are missing, import is refused.

Substantial fines:

National legislators have massively increased the fine frameworks. Violations of labeling or reporting obligations are penalized with high monetary fines.

Particularly critical:

A product that formally does not comply with GPSR labeling rules (for example missing address of the responsible person) is legally considered potentially unsafe and may neither be displayed, advertised nor sold in the EU internal market.

3. The 5 core requirements of the GPSR (what you must do)

To distribute your products legally under the GPSR in the EU, you must implement the following five core pillars:

Appointment of an EU responsible person:

Every consumer product manufactured outside the EU mandatorily requires an economic operator established in the EU (for example importer or an appointed authorized representative) who assumes compliance responsibility.

Carrying out an internal risk assessment:

Even for non-CE products, the manufacturer must create a systematic risk analysis. Aspects such as the target group (for example risk to children), cybersecurity (for connected products) and long-term durability must be assessed.

Ensuring traceability:

Products must have unique IDs (type, batch or serial numbers) in order to precisely isolate a faulty production batch in case of damage.

Fulfillment of extended labeling obligations:

Name and postal address of the manufacturer as well as the EU responsible person must be physically affixed to the product or packaging.

Establishment of a reporting and recall management system:

Economic operators must maintain channels for consumer complaints and are legally obligated to report accidents or safety risks immediately via the European Safety Gate (formerly RAPEX) to the authorities.

4. The roadmap to GPSR compliance: in 4 steps to legally compliant placement

As your strategic partner, we guide you efficiently and in a legally secure manner through the GPSR process:

Step 1: Status and actor analysis: We examine your supply chain and determine who in your setup assumes the role of manufacturer, importer or distributor. If you are located outside the EU, we provide the legally compliant EU responsible person.

Step 2: Risk assessment and labeling check: We create the necessary GPSR risk analysis for your products and check your physical labels, packaging layouts and instructions for use for compliance.

Step 3: Digital compliance for online marketplaces: We prepare the required data (manufacturer data, EU person, warnings, product images) in such a way that you can correctly store them in the backend systems of Amazon, eBay and others in order to prevent algorithmic blocks.

Step 4: After-sales and safety monitoring: We establish a system for recording customer complaints and set up the legally required process for official reporting and potential recall actions.

5. Your advantages through our professional support

Protection against loss of revenue:

No algorithmic listing removals or sudden suspensions of your top-selling products in online trade.

Legal certainty for non-CE goods:

Finally clarity and legal protection for product groups that previously seemed “unregulated” (for example clothing, decoration, furniture).

Customs and import security:

Smooth customs clearance at EU external borders through complete labeling of economic operators.

Everything from a single source:

Perfect integration of your existing CE processes with the new overarching requirements of the GPSR.

6. Important distinction: GPSR vs. CE, PPWR, EPR, ESPR and DPP

The GPSR must not be considered in isolation. It directly interacts with the existing compliance framework of the EU and must be strictly distinguished from other environmental and product regulations.

6.1 GPSR vs. CE marking

Focus: CE checks compliance with highly specific harmonized technical standards (for example frequencies, electrical voltages). The GPSR checks the general safety of the product in everyday use by the end consumer (for example sharp edges on furniture, strangulation risks in clothing).

Relationship: They do not exclude each other. A Bluetooth headphone requires CE marking (according to RED, EMC, RoHS) and must simultaneously meet GPSR requirements (indication of the responsible person in the online listing, recording of consumer complaints).

6.2 GPSR vs. PPWR and EPR

Focus: The GPSR protects the consumer from physical harm, injury or health risks caused by the product. PPWR and EPR protect the environment from waste and resource misuse through packaging or end-of-life.

Relationship: A GPSR-compliant product with perfectly visible manufacturer addresses can still be immediately removed from the market if EPR registration numbers (for example LUCID in Germany) are missing or if packaging violates PPWR volume restrictions.

6.3 GPSR vs. ESPR and Digital Product Passport (DPP)

Focus: While the GPSR focuses on safety at the time of placing on the market, ESPR and DPP regulate sustainability and circularity over the entire lifecycle (repairability, CO₂ footprint).

Relationship: The future Digital Product Passport (DPP) will revolutionize GPSR traceability. Product IDs, warnings and manufacturer data required under GPSR will be digitally stored and retrievable via the same QR code.

7. Product-specific GPSR requirements and practical examples

Since the GPSR does not prescribe specific technical standards, safety assessment is based on national standards, the state of the art and specific consumer risks.

Example 1: Textiles and clothing (for example children's hooded sweatshirt)

Relevant safety risks: strangulation risk due to cords, flammability of the material, chemical exposure from dyes (for example azo dyes).

Mandatory measures under GPSR:

- **Risk analysis:** verification of cord lengths according to EN 14682.
- **Traceability:** sewn-in textile label with batch number.
- **Online trade:** material composition and safety/washing instructions must be displayed in the local language.

Example 2: Furniture (for example wooden dining table or wall shelf)

Relevant safety risks: tipping stability, splintering, emissions of hazardous chemicals (for example formaldehyde), injury risk from sharp edges.

Mandatory measures:

- **Risk analysis:** load and stability testing (for example EN 12521).
- **Labeling:** manufacturer and importer address on the product
- **Assembly instructions:** clear instructions including mandatory wall-mount warning.

Example 3: Hand tools (for example hammer or screwdriver)

Relevant safety risks: material failure, handle loosening, insufficient insulation.

Measures:

- **Risk analysis:** testing according to DIN/EN standards.
- **Traceability:** engraving with model and year.
- **Warnings:** protective goggles symbol.

8. GPSR in e-commerce – fundamental obligations

Distance selling is at the absolute core of the GPSR. If you sell products online to European consumers, the following information must be clearly visible directly on the product page (detail page):

The manufacturer:

Name, registered trade name or registered trademark, as well as the full postal address and email/web address of the manufacturer.

The EU responsible person:

If the manufacturer is located outside the EU, the name, postal address, and electronic contact details (email or web address) of the responsible person must be included in the listing.

Product identification:

A high-resolution product image as well as information for clear identification (e.g. brand, model number, EAN/GTIN).

Warnings and safety information:

All warnings that are also physically affixed to the product or its packaging must be provided in the online shop in the respective language of the target market, either as text or as a clearly legible image.

9. Your liability as an economic operator under the GPSR

The GPSR defines liability and obligations very strictly along the entire supply chain:

- The manufacturer bears primary responsibility for the safety of the product and the preparation of the risk analysis.
- The importer must verify before import whether the manufacturer has fulfilled all obligations. They may not import a product if they believe it is unsafe. They must additionally affix their name and address to the product.
- The distributor (including resellers) may not simply pass on products unchecked. They must carry out spot checks to verify whether the required labeling is present.
- The operator of an online marketplace is not directly liable for the product, but must completely remove illegal and non-GPSR-compliant listings within 2 working days after notification by authorities.

The dropshipping and private label trap:

Anyone who distributes products under their own name/brand in the EU (private labeling / white labeling) or ships goods directly from outside the EU to end customers (dropshipping) automatically assumes the full legal liability of the manufacturer.

10. Why many GPSR projects fail

Missing EU address:

Many non-EU sellers use fake or mere mailbox addresses as the “responsible person.” Since authorities and marketplaces digitally verify this data, such sham arrangements are immediately exposed.

Language barriers for warnings:

Warnings are often provided only in English. However, the GPSR strictly requires the language of the respective EU country in which the product is sold.

Inadequate risk analyses for non-CE products:

Since there are no classic laboratory certificates for products such as clothing or decorations, documentation is often not created at all. In the event of an authority inquiry, the seller is then unable to provide a risk analysis.

11. Legal GPSR mandatory information for product and packaging

The same tiered principle as in CE law applies: labeling must primarily be affixed directly to the product. Only if this is impossible due to the size or nature of the product may it be placed on the packaging or an accompanying document.

- **The GPSR label checklist:** CE marking (only if the product is additionally subject to a CE directive).
- **Manufacturer details:** Official company name, legally valid postal address, email address or web URL.
- **EU responsible person:** Name of the person/company, full postal address within the EU, email address or web URL (mandatory for all non-EU manufacturers).
- **Product ID:** Model, type, batch, or serial number for clear identification.
- **Safety and warning information:** Specific, standards-compliant hazard symbols or text warnings in the respective official languages of the countries of sale.

12. Checklist – required documents for GPSR pre-audit

To legally assess the regulatory maturity of your products, the documentation must be collected in a structured manner. Please submit these documents bundled (one separate email per product line) to info@systemic-standards.com

Product & Actor Data

Product name, brand, high-resolution product images; contact details of the manufacturer and the designated EU responsible person.

Risk Assessment

Internal documentation on the identification of potential product risks (e.g. chemical, mechanical, sharp edges) and descriptions of the measures taken to eliminate them.

Test Reports (if available)

Laboratory reports on material testing, substance analyses (e.g. REACH, Oeko-Tex for textiles), or mechanical stress tests in accordance with national/EU standards.

Traceability Concept

Description of the numbering system (batch number, barcode, serialization) used to ensure that defective shipments can be traced back to the production facility.

Labeling Concept

Drafts and dimensional drawings of the product label, rating plate, and packaging design including all legally required information.

Instructions for Use & Safety Texts

Draft of the user manual, assembly instructions, as well as the exact wording of all safety and warning notices in the languages of the intended EU sales countries.

Complaint & Recall Plan

Proof of an internal system for recording customer complaints as well as a structured action plan in the event of a necessary product recall.

Product Liability Insurance

Proof of valid product liability insurance with EU-wide coverage. A minimum coverage amount of €1,000,000 is required; for higher-risk products (e.g. children's items), €2,000,000 to €3,000,000 is strongly recommended.

13. Next step toward legally compliant market approval

The GPSR has fundamentally tightened the rules of consumer protection in Europe. Anyone who neglects data provision and labeling loses visibility in e-commerce very quickly and risks severe account suspensions. A proactive and clean implementation protects your investments and secures a long-term competitive advantage in the largest internal market in the world.

We guide your company safely through GPSR regulation. Our approach is based on the seamless integration of technical product safety and digital data availability for e-commerce. We ensure that your physical labeling exactly matches your digital listings to guarantee permanent marketability and full legal compliance across the EU.

Why Systemic Standards?

We do not believe in rigid bureaucracy, but in smart systemic processes. We combine deep legal and technical know-how with practical, economically viable solutions for modern importers, manufacturers and traders. Whether consumer goods, complex electronics or industrial machines, we ensure that your products meet European safety standards not only on paper but in real practice. Systemic Standards – expertise in product safety. Excellence in compliance.

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