General Product Safety Regulation (GPSR) Checklist

The European Union's **General Product Safety Regulation** (Regulation (EU) 2023/988, or GPSR) fully replaced the General Product Safety Directive (GPSD) on **December 13, 2024**. It applies to **all consumer products placed on the EU market**, whether sold in physical retail or via digital platforms.

This regulation applies not only to EU-based companies but also to **non-EU manufacturers, brand owners, and importers**, including those based in the United States, Canada, UK, Switzerland, and Australia, if they sell directly to EU consumers or through marketplaces.

Key Changes Introduced Under the GPSR

1. Expanded Scope and Definitions

The **GPSR** introduces clarified definitions and expands legal obligations:

- **Manufacturer**: A company that produces a product or has one produced and markets it under its name or trademark.
- **Importer**: An EU-based business that places a product from a third country onto the EU market.
- **Distributor and Fulfilment Service Provider**: These parties now carry responsibility depending on how products move through the supply chain.
- A product is only "safe" if it poses **no risk under normal or foreseeable conditions**, taking into account:
  - Misuse scenarios
  - Digital components and updates
  - Vulnerable user groups (e.g., children, elderly)

2. Risk Assessment and Technical Documentation

All manufacturers must perform a **GPSR-compliant risk assessment** and compile supporting documentation in a **Technical File**, which must be retained for **10 years**. As outlined in **EaseCert's Technical Documentation Guide**, this file must include:

- Product details, specifications, and descriptions
- Risk analysis and mitigation measures
- Conformity declarations and testing reports
- Labeling proofs, manuals, and safety instructions
- Traceability data and surveillance processes
- Contact details for the manufacturer, importer, and EU Responsible Person

This documentation must be provided to EU authorities on request, without delay.

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3. Mandatory EU-Based Responsible Person

Non-EU manufacturers must appoint a **Responsible Person** (RP) within the EU.

As explained in **EaseCert's RP Guide**:

- The RP is legally responsible for storing compliance documentation, communicating with EU regulators, and coordinating any required corrective action.
- Acceptable roles include:
  - Authorised Representative
  - Importer
  - Fulfilment Service Provider
  - Distributor (if formally designated)
- The RP's full name, postal address, and email **must be printed** on the product, its packaging, or the enclosed documentation.
- An anonymous or non-EU RP is not permitted.

This is a **non-negotiable requirement** for listing products on EU marketplaces or placing goods in the EU market.
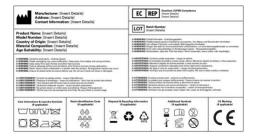
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4. Stronger Traceability and Labelling Requirements

Labeling now falls under stricter rules. According to **EaseCert's Labelling Guide**, the following must be included:

- Product identifier (type, model, serial/batch number)
- Name and contact information of the manufacturer or importer
- Responsible Person's name and address
- Required warning messages and safety instructions
- Translations for each language where the product is sold
- Durable, physical labels (QR codes alone are not accepted)

Missing or incorrect labels are among the top causes of enforcement action under GPSR.

For reference, download our **EaseCert Product Label Template**.

5. GPSR Risk Analysis Process

Following **EaseCert's Risk Assessment Framework,** each product must undergo a structured review for:

- Physical and Mechanical Hazards
- Flammability / Thermal Hazards
- Chemical Hazards
- Electrical Hazards
- Hygiene Hazards
- Radiation Hazards

All risks must be rated (Critical, Major, Minor) and documented in the technical file, along with preventive design measures and warnings.

Download our **GPSR Risk Analysis Template** for a structured approach to evaluating product safety risks.

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6. EU Safety Gate Registration Requirements

Under GPSR Article 25, online marketplace operators and sellers must register via the **EU Safety Gate – Online Marketplace Module**. This ensures streamlined communication between sellers and EU authorities for incident tracking, enforcement, and recall coordination.

According to **EaseCert's EU Safety Gate Registration Guide**:

- Registration is mandatory for sellers offering products via **their own online stores** (e.g., Shopify)
- The portal requires:
  - Business identification
  - Responsible Person details (if applicable)
  - Declaration that products comply with GPSR requirements
- Once registered, sellers must respond promptly to requests from **market surveillance authorities**

Failure to register may result in deactivation of listings, product bans, or marketplace restrictions.

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7. Compliance Checklist for Importers and Manufacturers

To comply with GPSR, businesses must:

1. Appoint an EU-Based Responsible Person
2. Perform and Document a Risk Assessment
3. Compile a Complete Technical File
4. Ensure Proper and Multilingual Labelling
5. Register with the EU Safety Gate (Online Sellers)
6. Update Online Listings to Include RP Details
7. Maintain Records for at Least 10 Years
8. Stay Current with EU Regulatory Guidance

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8. Penalties for Non-Compliance

GPSR enforcement includes:

- Product bans or market recalls, fines and legal sanctions
- Delisting from e-commerce platforms
- Public safety alerts (via RAPEX/Safety Gate)
- Reputational harm and blocked market access

EU authorities are now equipped for faster enforcement, including digital inspection and monitoring of online stores.

9. Final Thoughts

The GPSR is a sweeping regulatory shift. It places new burdens, but also clearer rules, on how companies can legally place products in the EU market. Non-EU businesses must now plan for:

- Documentation
- Risk transparency
- Accountability via a named Responsible Person
- Registration with digital safety platforms like the EU Safety Gate

EaseCert offers tailored, fixed-fee GPSR compliance services (EU Responsible Person representation, risk assessments, technical file documentation, labeling review, and Safety Gate support), ideal for importers, brands, and SMEs selling to the EU.

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10. Learn More

- EaseCert: EU Safety Gate Registration Guide
- EaseCert: GPSR Responsible Person – What EU Importers Must Know
- EaseCert: GPSR Labelling Requirements
- EaseCert: GPSR Technical File Documentation Guide
- EaseCert: The GPSR Risk Analysis Process
- EU Safety Gate – RAPEX Alerts
- Regulation (EU) 2023/988 – Official Journal