

HANDMADE SELLERS · EU MARKET

GPSR Compliance Kit



A plain-English, step-by-step guide to the EU General Product Safety Regulation for Etsy, Amazon & Shopify sellers of candles, jewelry, cosmetics, toys & soap.

Worked examples · Copy-paste listing blocks · Fill-in templates
Warning-label library (EN / DE / FR) · Final checklist

Edition: October 2026

⚠ **NOT LEGAL ADVICE**

This kit is **general information for educational purposes only**. It is not legal advice, and reading it does not create any professional relationship. Product-safety law is detailed and fact-specific:

- Requirements **vary by product category** (candles, jewelry, cosmetics, toys and soap are each treated differently under EU law) and by **EU member state** (national authorities implement and enforce the rules).
- Higher-risk categories — especially products for children — face **stricter scrutiny** and additional sector-specific legislation.
- Guidance from marketplaces and authorities **changes over time**. Always verify current requirements in official sources before you act.

Consult a qualified legal or compliance professional about your specific products, supply chain and target markets. Where this kit is unsure, it says so plainly — look for “check current guidance”.

Official sources to bookmark

- **Regulation (EU) 2023/988** — the General Product Safety Regulation itself (EUR-Lex).
- **European Commission** product-safety pages and GPSR guidance for businesses.
- **Etsy Help Center** — product-safety articles for sellers shipping to Europe.
- **Amazon Seller Central** — EU compliance and Responsible Person requirements.
- **Your national market-surveillance authority** in each country you sell to.

A note on tone

This kit is written like a knowledgeable friend walking you through it: plain English, no jargon without explanation, and honest about what it doesn't know. Compliance feels overwhelming at first — but it's a finite list of jobs. Work through it once per product line, keep your paperwork, and you're done.

How to use this kit

If you're new to all of this, read straight through once. If you're already selling, jump to the part you need:

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What you'll need before you start

Gather these once and the whole process gets much easier: your business name and contact details, a list of every product (and variant) you sell to the EU, your ingredients/materials lists, any supplier certificates or test reports you already have, and photos of your current labels and packaging.

The 30-second version

The EU's **General Product Safety Regulation (GPSR)** — Regulation (EU) 2023/988 — has applied since **13 December 2024**. It says: if you sell consumer products to buyers in the EU (and EEA countries, plus Northern Ireland), those products must be safe, traceable and properly labelled, your listings must show manufacturer and safety information, and — if you're based outside the EU — you need an **EU-based Responsible Person** named on your products and listings. That's the whole shape of it. The rest of this kit is the detail.

1. Does GPSR apply to you?

GPSR covers **consumer products placed on the EU market** — that includes products sold at a distance, i.e. **online listings that target EU buyers**. It applies whether you sell on Etsy, Amazon, Shopify, eBay or your own site. Walk through the check below.

The scope check

1 Do you sell physical consumer products?

Candles, jewelry, soap, toys, home décor, accessories — if a consumer buys it and uses it, it's in scope. **Digital downloads** (patterns, printables, e-books, graphics) are **not** covered by GPSR: it applies to physical products, not digital content or pure services.

2 Do your buyers include people in the EU, EEA or Northern Ireland?

If your listings are visible to and shippable to buyers in EU member states (plus Iceland, Liechtenstein, Norway — the EEA — and **Northern Ireland**, which follows EU product rules), GPSR applies to those sales. A US or UK seller shipping to Germany is placing products on the EU market.

3 Are your products new, or made to order?

GPSR covers new products, including handmade and made-to-order items. Second-hand and vintage products are generally in scope too, with a narrow exception for antiques where buyers cannot reasonably expect modern safety standards — **if you sell vintage, check current guidance**.

✓ You're likely in scope if...

You hand-make candles, jewelry, soap, toys or similar physical goods and accept orders from EU/EEA/NI buyers through any online channel. That describes most Etsy, Amazon Handmade and Shopify sellers reading this kit.

X You're likely out of scope if...

You sell **only** digital downloads, or you **only** ship within your own non-EU country and block EU/EEA/NI buyers entirely. (Blocking means genuinely not offering shipment there — not just hoping they don't order.)

GPSR vs. sector-specific rules

GPSR is the **general safety net**: it applies to all consumer products. But some categories have their **own EU legislation** that takes precedence for the aspects it covers:

- **Toys** → EU Toy Safety Directive 2009/48/EC (stricter, includes CE marking).
- **Cosmetics** (lotions, lip balms, bath products with cosmetic claims) → EU Cosmetics Regulation (EC) 1223/2009, which has its own Responsible Person and notification system.

Where those laws don't cover something, GPSR fills the gap. The worked examples in Section 5 flag exactly where this matters for your category — **check your category requirements: higher-risk categories face stricter scrutiny.**

2. What's your role? Manufacturer, importer or distributor?

GPSR assigns obligations by **what you actually do**, not by what you call yourself. Most handmade sellers are **manufacturers** — and that carries the heaviest paperwork. Find yourself below.

Role	You are this if...	Your core GPSR duties
Manufacturer	You make the product yourself, or you have it made to your design, or you sell it under your own brand name.	Risk assessment, technical documentation, traceability labelling, safety information & warnings, corrective action and accident reporting.
Importer	You are based in the EU and bring products made outside the EU into the EU market.	Verify the manufacturer did its homework, keep documentation available, don't place unsafe products on the market.
Distributor	You resell products within the EU that someone else made/imported (e.g. a stockist of your goods).	Check markings and documents are present, act if you learn of a safety problem.
Authorised representative	An EU-based person/company formally appointed in writing by a non-EU manufacturer.	Carries out the tasks in the written mandate — commonly acts as the Responsible Person .

The private-label trap

If you design a product but have someone else produce it — a common Etsy/Amazon setup — you are still the **manufacturer** for GPSR purposes if it's sold under your brand. You inherit the full documentation duty, whatever your supplier contract says. Ask your producer for materials data and test reports, but the risk assessment and technical file are **yours**.

Marketplaces have duties too

Etsy, Amazon and similar platforms must provide a single point of contact for authorities, act on takedown orders and cooperate on tracing sellers. That's partly why they now **ask you** for Responsible Person and safety details — and why listings without them can be suppressed or removed.

Not legal advice. Role boundaries can be subtle (e.g. fulfilment service providers have their own duties). If your supply chain is complex, get professional advice.

3. The 7-step compliance process

Do these **in order**, once per product line. Steps 1–3 are paperwork you do yourself; step 4 usually means engaging a service; steps 5–7 are labelling, listings and record-keeping. Most sellers complete the cycle in a few focused evenings.

1 Confirm scope

Use the check in Section 1. Decide for each product line: in scope or out? Note any sector-specific legislation (toys, cosmetics) that applies *instead of or alongside* GPSR. Write the decision down — it becomes the first page of your technical file.

2 Risk assessment

Carry out an **internal risk analysis** proportionate to your product: identify who could be harmed (children? allergy sufferers?), how (burns? choking? skin reaction?), and what controls you've built in (warnings, design choices, materials). Even simple products need this — a candle's risk assessment is short, but it must exist. See the worked examples in Section 5 and the blank template in Section 9.

3 Technical file

Draw up **technical documentation**: product description and identifier, materials/ingredients list, your risk assessment, label and packaging artwork, instructions and warnings, supplier certificates or test reports (if any), and your scope decision. Keep it per product line. Details and a blank template in Sections 8–9.

4 Appoint an EU Responsible Person

If you are based **outside the EU**, your products need an **economic operator established in the EU** responsible for product-safety tasks — the “Responsible Person” (RP). This is usually an **authorised representative** you appoint in writing, or an EU-based importer/fulfilment partner if your setup includes one. EU-based sellers: you (or your EU importer) already fill this role. Section 4 explains it fully, with a factual provider comparison.

5 Product & packaging labels

Put on the product, its packaging or accompanying documents: a **type/batch/serial identifier**, **your name (or trade mark) and contact details** as manufacturer, the **Responsible Person's name and postal + electronic address**, and **warnings and instructions** in a language easily understood where you sell. Section 7 covers the detail; Section 10 gives you ready warnings in EN/DE/FR.

6 Listing text (Etsy / Amazon / Shopify)

Your **distance-sale offers** — product listings — must show the manufacturer and Responsible Person information, the product identifier, and safety information/warnings. Etsy added dedicated product-safety fields (including shop-level Responsible Person) in its April 2025 update; Amazon requires RP data in certain categories and suppresses non-compliant listings; on Shopify you add it to your product pages yourself. Copy-paste blocks in Section 6.

7 Keep records for 10 years

Keep your technical documentation available for **10 years after the last unit of that product is placed on the market**, and be ready to show it to market-surveillance authorities on request. Also keep a simple log of any safety complaints or incidents and what you did about them. Section 8 covers records and accident reporting.

Done is better than perfect

Authorities expect documentation **proportionate** to the product. A soy candle from a one-person studio doesn't need a corporate compliance department's file — it needs an honest risk assessment, correct labels, an RP, and a tidy folder of records. That's achievable.

Not legal advice. This is a general summary of the process; your category or member state may add requirements.

4. The EU Responsible Person, explained

The single biggest change GPSR brought for non-EU handmade sellers is this: **no product may be placed on the EU market without an economic operator established in the EU** who is responsible for product-safety tasks. In seller shorthand, that operator is the **Responsible Person (RP)**.

Who can be the Responsible Person?

It must be an economic operator **established in the EU** — one of:

- **The manufacturer**, if based in the EU;
- **The importer** (the EU-based business bringing the goods in);
- **An authorised representative** — an EU-based person or company formally appointed *in writing* by a non-EU manufacturer (this is the route most US/UK handmade sellers take); or
- **A fulfilment service provider** established in the EU, where the arrangement genuinely makes them the responsible operator.

(These roles are defined in the economic-operator provisions of Regulation (EU) 2023/988, Art. 4 context.) If you're a US or UK maker selling direct to EU consumers on Etsy or Shopify, in practice you **appoint an authorised representative service** to act as your RP.

What does the Responsible Person actually do?

In plain English, the RP is your EU-based safety contact. Their tasks include:

- Making sure the product meets the **technical documentation** requirements and that documentation exists;
- Making sure the product carries the required **labelling and information** (identifiers, manufacturer details, warnings);
- **Keeping documentation available** and providing evidence of checks if market-surveillance authorities ask;
- **Cooperating with authorities** on corrective action (withdrawals, recalls, safety notices);
- Ensuring **accidents and serious safety issues are reported** to the authorities where required;
- Having their **name, postal address and electronic address (email or phone)** shown on the product/packaging/documents **and** in your online listings.

What the RP is *not*

Appointing an RP does **not** transfer your responsibility for making a safe product. You remain the manufacturer: the risk assessment, safe design and honest warnings are yours. The RP is your EU contact and documentation-holder, not a certificate that makes everything automatically compliant. *Not legal advice.*

How to get one

1. **Shortlist providers** that act as authorised representative / Responsible Person for your product category (comparison table overleaf).
2. **Check current terms** — offerings and prices change; confirm what's included (number of products, documentation review, authority liaison) before you commit.
3. **Sign a written mandate** appointing them as your authorised representative for GPSR purposes.
4. **Send them your technical documentation** (or build it with their tools) so they hold what the law requires them to hold.
5. **Put their details on your labels and in your listings** (Sections 6–7).

Choosing: questions to ask any provider

- Will you act as my **authorised representative / Responsible Person** under a written mandate?
- How many products or variants are covered, and what does it cost to add more? (*Prices change — get a current quote.*)
- Do you review my technical documentation, or only store it?
- How do you handle an authority enquiry, and how quickly?
- What happens to my documentation if I cancel?

Factual provider comparison

Descriptions below summarise what each provider **publicly states it offers**, based on information available at the time of writing (October 2026). This is **not an endorsement** and not a ranking — offerings change, so verify current terms yourself. No affiliate links are included. *Not legal advice.*

Provider	What they state they offer	Notes for handmade sellers
Euverify Cloud-based compliance platform	GPSR compliance tools for non-EU manufacturers: document-creation tools (e.g. declarations, risk-assessment support), product registration workflows, secure technical-file storage described as meeting the 10-year retention duty. Also covers related EU/UK regimes (cosmetics, GDPR representation).	Platform-style service: you build documentation in their dashboard rather than handing everything to a consultant. Useful if you want guided DIY. Confirm whether RP appointment itself is included in the plan you choose.
EaseCert EaseCert GmbH, Trier, Germany	Describes itself as acting as EU Authorised Representative and Responsible Person under GPSR. Lists services including documentation review and storage, product risk assessments, labelling and traceability verification, and communication with EU authorities.	A Germany-based authorised-representative service, i.e. the classic “appoint us as your RP” model. Check how many products/variants are covered and what documentation they require from you.
Instilus Trading name of A Star Supply	Prepares GPSR document packs for (mainly UK) sellers from information the seller supplies. Explicitly states it is not a Responsible Person and does not certify products.	Covers the <i>paperwork</i> step, not the RP appointment. If you use Instilus for documents, you still need a separate authorised representative as your Responsible Person.
eugpsr.de Associated with Grüner Baum GmbH, Germany	GPSR support aimed at non-EU sellers and manufacturers, including Responsible Person services and practical guidance on product-listing information for Etsy, Shopify and Amazon sellers.	Positioned specifically at marketplace sellers. As with any provider, confirm the written mandate terms and what’s included before appointing.

Also worth knowing

Etsy’s own seller guidance names **Cert-Rep** and **International Associates** as third-party providers it has partnered with for GPSR compliance services including Authorised Representative support — and notes you’re welcome to choose any provider that fits your shop. That’s Etsy’s statement, repeated here factually, not a recommendation.

5. Worked examples by category

Five filled-in examples showing how a risk assessment actually looks for typical handmade products. **Copy the structure, not the content** — your materials, design and customers differ, so your hazards will too. Each example ends with the warning labels that category needs. *Not legal advice; check your category requirements — higher-risk categories face stricter scrutiny.*

EXAMPLE A

Scented soy candle in glass jar

Product: “Ember & Oak” scented soy-wax candle, 220 g, in glass jar with metal lid. Sold on Etsy & Shopify to EU buyers.

Intended users: Adults. **Reasonably foreseeable misuse:** left burning unattended; placed near curtains; used by older children; burned to the bottom of the jar.

Hazard	Who’s at risk	Controls in place	Residual risk
Open flame → fire if near flammables or left unattended	Household, neighbours	Warning label: never leave burning candle unattended; keep away from flammable materials, children & pets; burn on heat-resistant surface	Low — controlled by warnings + normal adult use
Burns from hot glass / liquid wax	User	Warning: jar becomes hot; do not touch when lit; keep wax pool free of debris	Low
Glass jar cracking from heat if burned too low	User	Warning: stop use when 1 cm of wax remains; design uses heat-rated container glass	Low
Fragrance sensitivity / soot from poor wick	Allergy sufferers	Fragrance used within supplier’s recommended load; wick trimmed to 5 mm before each burn (label instruction); ingredient list available on request	Low

Warning-label guidance — candles

- **Always include:** never leave a burning candle unattended; keep away from children and pets; keep away from flammable materials; burn on a heat-resistant surface; trim wick to 5 mm before each use; stop when 1 cm wax remains.
- **Language:** in the language(s) easily understood in each country you ship to (see Section 7); the EN/ DE/FR library in Section 10 covers the core warnings.
- **Placement:** on the jar or its box, plus repeated in the online listing.

EXAMPLE B**Handmade beaded bracelet (adult fashion jewelry)**

Product: Glass-bead stretch bracelet with metal-alloy spacer beads and charm. Sold on Etsy to EU buyers.

Intended users: Adults (fashion jewelry, not a toy). **Reasonably foreseeable misuse:** given to a small child to play with; worn during sleep; chewed by a toddler.

Hazard	Who's at risk	Controls in place	Residual risk
Small beads → choking if elastic breaks and beads scatter	Small children (foreseeable access)	Warning: not a toy; keep away from children under 3; strong elastic, knot secured and glued; beads inspected before stringing	Low for intended adult use
Nickel allergy from metal-alloy components	Nickel-sensitive wearers	Supplier confirms nickel-compliant components; listing states materials; "discontinue use if irritation occurs" note	Low
Lead/cadmium content in metal parts	All wearers	Supplier declarations requested for metal components; EU REACH restricts lead, cadmium and nickel in jewelry — verify your components against current REACH limits	Low (verified)
Elastic snapping → beads as projectiles	User, bystanders	Pre-stretched elastic, load-tested by maker; care card advises replacing if elastic loosens	Low

Warning-label guidance — jewelry

- **Always include:** not a toy — keep away from small children (choking hazard from small parts); materials disclosure (metals used); discontinue use if skin irritation occurs.
- **Children's jewelry** is higher-risk: stricter chemical and small-parts scrutiny applies — **check your category requirements** before selling jewelry marketed to children.
- Keep supplier declarations for metals on file (part of your technical file).

Not legal advice. Chemical restrictions (REACH) change; verify current limits for nickel, lead and cadmium in jewelry.

EXAMPLE C

Handmade lip balm

⚠ Category alert: cosmetics have their own EU regime

A lip balm — like lotions, soaps with cosmetic claims, bath bombs and similar — is a **cosmetic** under EU law, regulated by the **EU Cosmetics Regulation (EC) 1223/2009**, not just GPSR. That regime requires its own **EU Responsible Person**, a **cosmetic product safety report**, and **CPNP notification** before sale. The GPSR-style risk assessment below is a useful starting framework, but **it does not replace cosmetics compliance — check your category requirements**.

Product: Beeswax/olive-oil lip balm with peppermint essential oil, in twist tube. Sold on Etsy to EU buyers.

Intended users: Adults and older children. **Foreseeable misuse:** ingestion by small child; use on broken skin; use by someone with mint allergy.

Hazard	Who's at risk	Controls in place	Residual risk
Skin/lip irritation or allergy (peppermint oil, fragrance allergens)	Sensitive users	Essential oil within supplier's dermal limits; full ingredient list on label (INCI names); warning: discontinue use if irritation occurs	Low
Ingestion by small child	Toddlers	Warning: keep out of reach of children; non-toxic food-grade base oils; tube is not child-attractive packaging	Low
Microbial contamination (handmade, no preservative)	All users	Anhydrous (water-free) formula resists microbial growth; small-batch production with hygiene protocol; batch code + best-before date on label	Low
Eye contact	User	Warning: avoid contact with eyes; for external use only	Low

Warning-label guidance — cosmetics

- **Always include:** full ingredient list (INCI naming), net content, batch code, best-before or “period after opening” symbol, manufacturer + RP details, “for external use only”, keep out of reach of children, discontinue-use-on-irritation note. Certain **fragrance allergens must be individually named** above threshold levels — check current cosmetics labelling rules.

EXAMPLE D

Wooden stacking toy (toddler)

⚠ **Category alert: toys have their own EU directive**

Toys are covered by the **EU Toy Safety Directive 2009/48/EC**, which takes precedence over GPSR for the aspects it covers and is **stricter** (it generally requires **CE marking**, an EU declaration of conformity and specific chemical, physical and flammability requirements). GPSR acts as the safety net underneath. The example below follows GPSR risk-assessment structure, but **toys are the highest-scrutiny handmade category — check your category requirements and consider professional testing.**

Product: Beech-wood stacking rings with water-based paint, for ages 18 months+. Sold on Etsy to EU buyers.

Intended users: Toddlers (with adult supervision). **Foreseeable misuse:** mouthing/chewing; throwing; use by younger babies.

Hazard	Who's at risk	Controls in place	Residual risk
Choking on detached small parts (paint chips, broken ring)	Toddlers	Oversized components (no small-parts cylinder failures by design); smooth, splinter-free finish; drop-tested by maker; warning: adult supervision recommended	Low
Paint/chemical migration from mouthing	Toddlers	Water-based, toy-grade paints; supplier declarations requested; verify against current toy chemical limits — professional migration testing is the gold standard	Low (verify)
Splinters / sharp edges	Toddlers	Sanded to smooth finish, rounded edges, sealed; each piece inspected before packing	Low
Strangulation (cord, if any)	Small children	No cords/strings in design; age grade 18m+ marked on packaging	Negligible

Warning-label guidance — toys

- **Always include:** age grade (e.g. "18 months+"), "not suitable for children under 36 months" with the reason (e.g. small parts) where applicable, adult-supervision recommendation, manufacturer + RP details, batch identifier, CE marking per the Toy Safety Directive.
- Warnings for toys must be **clearly visible at the point of sale** — including in your online listing.

EXAMPLE E

Cold-process bar soap (lavender)

⚠ **Category note: most soap is a cosmetic in the EU**

Soap marketed with cleansing, moisturising or beautifying claims is treated as a **cosmetic** under the EU Cosmetics Regulation (EC) 1223/2009 — which is the case for most handmade soap sold to EU buyers. If yours is, follow the cosmetics regime (see Example C's alert). The GPSR-format assessment below is provided as requested for soap as a product, and as a starting framework — **check your category requirements**.

Product: Cold-process olive/coconut-oil bar soap with lavender essential oil, 100 g, paper wrap. Sold on Etsy & Shopify to EU buyers.

Intended users: Adults. **Foreseeable misuse:** use on face/eyes; ingestion by child; use on broken skin.

Hazard	Who's at risk	Controls in place	Residual risk
Skin irritation / sensitisation (lavender oil, fragrance)	Sensitive users	Essential oil at supplier-recommended dermal level; full 4–6 week cure to complete saponification; ingredient list on wrap; discontinue-use warning	Low
Residual lye (incomplete saponification)	All users	Recipe lye discount (superfat) built in; full cure period observed; pH spot-checked per batch; batch log kept	Low
Eye contact	User, children	Warning: avoid contact with eyes; for external use only; keep out of reach of children	Low
Slippery bar → dropped on foot / slip in shower	User	Care card: store on draining dish away from direct water stream	Low

Warning-label guidance — soap

- **Always include:** ingredient list, net weight, batch code, “for external use only”, avoid eye contact, keep out of reach of children, discontinue use if irritation occurs, manufacturer + RP details.
- If you make any **therapeutic or medical claims** (“heals eczema”), you enter medicinal-product territory — don't. Cosmetic claims only, and even those must be substantiated under EU rules.

Not legal advice. Category rules vary — verify against current official guidance for your exact product type.

6. Listing text: copy-paste blocks

Your online listings are “distance-sale offers” under GPSR: they must show the **manufacturer’s name and contact details**, the **Responsible Person’s name, postal and electronic address**, the **product identifier** (type/batch/SKU) and **safety information/warnings**. Fill in the [BRACKETED] parts, then paste. *Not legal advice.*

Etsy

Etsy added dedicated **product-safety fields** to listings (April 2025 update), including **shop-level Responsible Person** details — fill those in first (Shop Manager → product-safety settings), then add per-listing safety info. Use the block below in the listing’s safety/description area:

```
PRODUCT SAFETY INFORMATION
Manufacturer: [YOUR BUSINESS NAME], [STREET ADDRESS], [CITY, POSTCODE, COUNTRY] |
[EMAIL]
EU Responsible Person: [RP COMPANY NAME], [RP STREET ADDRESS], [CITY, POSTCODE, EU
COUNTRY] | [RP EMAIL/PHONE]
Product identifier: [SKU / BATCH CODE, e.g. EMBER-OAK-220]
Safety information: [PASTE YOUR WARNINGS HERE – see Section 10]
Age guidance (if any): [e.g. Not suitable for children under 3 years]
```

Amazon (including Amazon Handmade)

Amazon’s requirements **vary by category and change over time** — check Seller Central for your category’s current compliance attributes. Amazon **suppresses listings without valid Responsible Person information** in certain categories, so don’t skip this. Where free-text safety fields are available, use:

```
Manufacturer: [YOUR BUSINESS NAME], [FULL POSTAL ADDRESS], [EMAIL]
EU Responsible Person (Authorised Representative): [RP COMPANY NAME], [RP FULL EU
POSTAL ADDRESS], [RP EMAIL/PHONE]
Product ID: [ASIN / SKU / BATCH]
Warnings: [PASTE YOUR WARNINGS HERE – see Section 10]
Instructions for safe use: [1-2 LINES, e.g. “Trim wick to 5 mm before each burn.”]
```

Shopify (and your own website)

Shopify doesn't add GPSR fields for you — add a “**Product safety**” section to your product-page template (or paste the block into each product description). One setup, reused everywhere:

PRODUCT SAFETY

Made by: [YOUR BUSINESS NAME], [FULL POSTAL ADDRESS], [EMAIL]

EU Responsible Person: [RP COMPANY NAME], [RP FULL EU POSTAL ADDRESS], [RP EMAIL/PHONE]

Product identifier: [SKU / BATCH CODE]

Safety warnings: [PASTE YOUR WARNINGS HERE — see Section 10]

Questions about product safety? Contact us at [EMAIL] or our EU Responsible Person above.

Keep listings and labels consistent

The manufacturer name, RP details and warnings in your listings must **match** what's on the product and packaging. Authorities and marketplaces cross-check. When your RP or address changes, update **everywhere** — labels, listings, and your technical file — at the same time.

Photos count too

Your listing images should show the product clearly enough for identification, and any **on-pack warnings should be legible** in at least one photo where practical. It's a small trust signal that also helps if a listing is ever reviewed.

Not legal advice. Marketplace interfaces change — if a field name in this kit doesn't match what you see, use the closest current equivalent and check the platform's help centre.

7. Labelling: what goes on the product & packaging

On the **product itself, its packaging, or accompanying documents** (a hang tag or care card counts), show:

Element	Detail
Product identifier	Type, batch or serial number (or SKU) — enough to trace the exact product if there's ever a problem. Batch codes on handmade goods are ideal.
Your details (manufacturer)	Your name (or registered trade name/trade mark) and contact address — postal address plus email or phone.
Responsible Person details	The RP's name/company name, postal address and electronic address (email or phone). Required as a pre-condition of marketing the product.
Warnings & instructions	Safety information for safe use, in a language easily understood by consumers in the country of sale (see below).

The language question

Safety information must be in a **language easily understood by consumers** in the member state where the product is sold — in practice, that means the **local language** of each country you ship to. Common-sense approaches sellers use:

- **Multilingual labels** for your top markets (the EN/DE/FR warning library in Section 10 covers three of the biggest);
- A **QR code on the pack** linking to full safety info in multiple languages (a supplement to, not a replacement for, on-pack essentials — check current guidance on what must be physically printed);
- **Limiting ship-to countries** until you can label for more — a legitimate strategy while you scale.

Small products, big requirements

If the product itself is too small for all this text (a lip-balm tube, a single earring card), GPSR allows the information on the **packaging or accompanying documents** instead. Use a backing card, box or insert — don't just drop it.

Not legal advice. Member states can set their own language rules — verify for each country you sell to.

8. Records, technical files & accident reporting

The 10-year rule

Keep your **technical documentation for 10 years after the last unit** of a product is placed on the market, and make it available to market-surveillance authorities on request. A “technical file” per product line is simply a folder (digital is fine) containing:

- Product description, photos and identifier/SKU system;
- Your scope decision (Section 1) and role (Section 2);
- The **risk assessment** (Section 5 format);
- Materials/ingredients lists and supplier declarations or test reports;
- Label, packaging and insert artwork (showing warnings and RP details);
- Your RP’s written mandate and contact details;
- Listing screenshots or saved listing text showing safety information;
- A **complaints/incidents log** (date, what happened, what you did).

The complaints log matters more than you think

One line per event: *“2026-09-14 — buyer reported wick smoking heavily — advised trimming to 5 mm, replaced candle, noted batch.”* If an authority ever asks, a contemporaneous log shows you take safety seriously. No log looks like no process.

Accidents and serious safety issues

If you learn that one of your products has caused (or could cause) a **serious accident or safety risk**, GPSR expects **notification to the authorities** — normally via your Responsible Person and the EU’s Safety Business Gateway — plus **corrective action** (warning buyers, withdrawing or recalling the product). Don’t sit on it: tell your RP immediately and follow their process. **Check current guidance** for the exact notification route, which can change.

Not legal advice. “Serious” has a specific meaning in the Regulation — when in doubt, report and get advice rather than deciding alone.

9. Templates

Print or copy these for every product line. One filled risk assessment + one technical file per product line is the core of your compliance paperwork. *Not legal advice.*

Template A — Blank risk assessment

Product name / identifier: _____

Variant(s) covered: _____

Intended users: _____

Reasonably foreseeable misuse: _____

Assessed by / date: _____ Review date: _____

Hazard What could cause harm?	Who's at risk	Risk before controls High / Med / Low	Control measures Design, warnings, materials...	Residual risk High / Med / Low

Overall conclusion: _____

Warnings to carry on label + listing:

Tip: “Risk before controls” is your honest first guess; “residual risk” is what’s left after your warnings and design choices. If residual risk isn’t Low, redesign or add controls until it is — or don’t sell it.

Template B — Blank technical file (cover sheet)

Keep one file per product line. Tick off and file each item behind this sheet — digital folders are fine.

Product line: _____

File opened: _____

SKUs / batch-code system: _____

Manufacturer: _____

EU Responsible Person: _____

Mandate signed: _____

✓	Document	Location / filename
	Scope decision (why GPSR applies; any sector-specific legislation noted)	
	Product description + photographs	
	Risk assessment (Template A, filled)	
	Materials / ingredients list (INCI names for cosmetics)	
	Supplier declarations / test reports	
	Label, packaging & insert artwork (final versions)	
	Warnings & instructions (all languages used)	
	RP written mandate + RP contact details	
	Listing text / screenshots showing safety information	
	Complaints & incidents log	

Retention: keep this file for **10 years** after the last unit is placed on the market. **Review:** revisit the risk assessment whenever you change materials, suppliers, design or packaging.

Not legal advice. Higher-risk categories may need additional documents (e.g. declarations of conformity, lab test reports) — check your category requirements.

10. Warning-label library

Core warnings in **English, German and French** — the three biggest EU e-commerce languages. Pick the warnings that fit your product, print them on labels/packaging and repeat them in listings. **Have a native speaker verify** these before you print at scale, and add further languages for other ship-to countries. *Not legal advice.*

English	Deutsch	Français
Keep out of reach of children.	Außerhalb der Reichweite von Kindern aufbewahren.	Tenir hors de portée des enfants.
Not suitable for children under 3 years — choking hazard (small parts).	Nicht für Kinder unter 3 Jahren geeignet — Erstickungsgefahr durch Kleinteile.	Ne convient pas aux enfants de moins de 3 ans — risque d'étouffement (petites pièces).
Not a toy.	Kein Spielzeug.	Ceci n'est pas un jouet.
Never leave a burning candle unattended.	Eine brennende Kerze niemals unbeaufsichtigt lassen.	Ne jamais laisser une bougie allumée sans surveillance.
Keep away from flammable materials.	Von brennbaren Materialien fernhalten.	Tenir éloigné des matières inflammables.
Burn on a heat-resistant surface.	Auf einer hitzebeständigen Unterlage abbrennen.	Faire brûler sur une surface résistante à la chaleur.
Trim wick to 5 mm before each use.	Docht vor jedem Gebrauch auf 5 mm kürzen.	Couper la mèche à 5 mm avant chaque utilisation.
Container becomes hot — do not touch when lit.	Behälter wird heiß — nicht berühren, solange die Kerze brennt.	Le récipient devient chaud — ne pas toucher pendant la combustion.
For external use only.	Nur zur äußerlichen Anwendung.	Pour usage externe uniquement.
Avoid contact with eyes.	Kontakt mit den Augen vermeiden.	Éviter le contact avec les yeux.

English	Deutsch	Français
Discontinue use if skin irritation occurs.	Bei Hautreizungen die Anwendung abbrechen.	Cesser l'utilisation en cas d'irritation cutanée.
Do not ingest.	Nicht einnehmen / nicht verschlucken.	Ne pas ingérer.
Keep away from pets.	Von Haustieren fernhalten.	Tenir éloigné des animaux domestiques.
Adult supervision recommended.	Verwendung unter Aufsicht von Erwachsenen empfohlen.	Utilisation sous la surveillance d'un adulte recommandée.
Stop use when 1 cm of wax remains.	Nicht weiter abbrennen, wenn noch 1 cm Wachs vorhanden ist.	Cesser l'utilisation lorsqu'il reste 1 cm de cire.
Store in a cool, dry place away from direct sunlight.	Kühl, trocken und vor direkter Sonneneinstrahlung geschützt lagern.	Conserver dans un endroit frais et sec, à l'abri de la lumière directe du soleil.
Contains fragrance — may cause an allergic reaction.	Enthält Duftstoffe — kann allergische Reaktionen hervorrufen.	Contient du parfum — peut provoquer une réaction allergique.
Handle with care — breakable.	Vorsichtig behandeln — zerbrechlich.	Manipuler avec précaution — fragile.

Using this library

- You don't need *every* warning — only the ones matching your risk assessment (Section 5 shows which fit each category).
- Warnings must be **clearly legible**: mind font size on small packaging, and keep contrast high.
- For any country beyond EN/DE/FR, get the warnings **professionally translated** — machine translation of safety text is a risk in itself.

Not legal advice. Some categories require specific statutory warning phrases — check your category requirements.

11. FAQ — 10 questions sellers actually ask

General information only — not legal advice. When in doubt, check current official guidance or consult a professional.

1. I only sell on Etsy. Do I still need an EU Responsible Person?

Yes — if you're based outside the EU and sell to EU buyers. Etsy's product-safety fields are where you *declare* your Responsible Person; they don't replace having one. No RP, no compliant listing.

2. I'm in the US. Does an EU regulation really apply to me?

Yes, if you target EU consumers. GPSR applies to products *placed on the EU market*, including through distance sales — your location doesn't exempt you; it's exactly why the Responsible Person requirement exists.

3. What about Northern Ireland?

Northern Ireland follows EU product rules, so treat NI buyers like EU buyers for GPSR purposes. Great Britain (England, Scotland, Wales) has its own separate UK product-safety regime — GPSR as such doesn't apply there.

4. Do my digital downloads (patterns, printables) need GPSR compliance?

No. GPSR covers physical consumer products, not digital content or pure services. (If you sell both, the physical goods still need the full process.)

5. I only sell a few items a year. Is there a small-seller exemption?

No general de-minimis exemption exists in GPSR — the duties apply whether you sell ten units or ten thousand. The good news: your documentation can be *proportionate* to a simple product range, so the workload is small.

6. Can a friend in the EU be my Responsible Person?

Only if they genuinely take on the role: an economic operator established in the EU, formally appointed in writing, able to hold your technical documentation, cooperate with authorities and handle incident reporting. A casual favour without a proper mandate doesn't meet the requirement — **check current guidance** before going this route. Most sellers use a professional service (Section 4).

7. Do I really have to translate labels into every EU language?

Safety information must be in a language easily understood where the product is sold — in practice the local language of each ship-to country. Many sellers start with EN/DE/FR labels for their main markets and expand (or limit ship-to countries) from there. Member states can set their own language rules, so verify per country.

8. What happens if I don't comply?

Marketplaces can **suppress or remove listings** lacking required safety information (Amazon does this in certain categories today), and national market-surveillance authorities can order products withdrawn or recalled. **Penalties are set by individual member states** — this kit won't quote figures because they vary and change; check current guidance for your markets.

9. Is a risk assessment really needed for something simple like a candle?

Yes. GPSR requires an internal risk analysis proportionate to the product. For a candle it's a short table (see Example A) — but "it's obviously safe" isn't documentation. Write it down once, review when anything changes.

10. How do I prove compliance if an authority asks?

Show your **technical file**: risk assessment, materials data, label artwork, RP mandate, listing records and complaints log — kept for **10 years** after the last unit is placed on the market. That file *is* your proof. Keep it tidy and complete (Template B, Section 9).

12. Common mistakes to avoid

1 Appointing an RP but never sending them your documents

The RP must actually hold your technical documentation. A signed mandate with an empty file behind it fails the core duty — send the paperwork.

2 Listing info that doesn't match the label

Different RP name on Etsy vs. on the box, or warnings online that never made it to print. Authorities and marketplaces cross-check — update everywhere at once.

3 Treating cosmetics or toys as “just GPSR”

Lip balm needs the Cosmetics Regulation regime; wooden toys need the Toy Safety Directive. GPSR alone isn't enough there — **check your category requirements**.

4 No batch codes

Without a batch/identifier system you can't trace products if something goes wrong — and traceability is an explicit GPSR duty. Batch codes cost nothing on handmade goods.

5 English-only warnings for non-English markets

A warning the buyer can't read doesn't protect them — or you. Use Section 10's library and expand languages with your markets.

6 No complaints log

Even three lines in a notebook beats nothing. It's the cheapest credibility you'll ever buy.

Not legal advice.

The final checklist

Work top to bottom, one product line at a time. When every box is ticked, you're in good shape — then just maintain.

- ☐ **Scope confirmed** for this product line (GPSR applies; sector-specific rules noted).
- ☐ **My role identified** (manufacturer — most likely — and what that requires).
- ☐ **Risk assessment written** (Template A), proportionate to the product.
- ☐ **Technical file assembled** (Template B cover sheet + all documents).
- ☐ **EU Responsible Person appointed** in writing; mandate signed.
- ☐ **RP holds my technical documentation** (actually sent, not just promised).
- ☐ **Labels/packaging show:** identifier, my details, RP details, warnings.
- ☐ **Warnings in the right languages** for every ship-to country.
- ☐ **Etsy:** shop-level RP set + per-listing safety fields completed.
- ☐ **Amazon:** RP data in the required fields for my categories (check Seller Central).
- ☐ **Shopify/website:** product-safety section live on product pages.
- ☐ **Listing info matches label info** (names, addresses, warnings identical).
- ☐ **Complaints/incidents log** started (even if empty so far).
- ☐ **10-year retention** understood: files kept 10 years after last unit placed on the market.
- ☐ **Review trigger set:** revisit the file when materials, suppliers, design or packaging change.

You've got this

Compliance isn't a personality trait — it's a folder, a label and a listing. Build it once per product line, keep it current, and get back to the making. Good luck with your EU sales.

GPSR Compliance Kit — Edition October 2026. General information only; not legal advice. Verify current requirements in official sources (Regulation (EU) 2023/988, European Commission guidance, Etsy Help Center, Amazon Seller Central) before acting.