

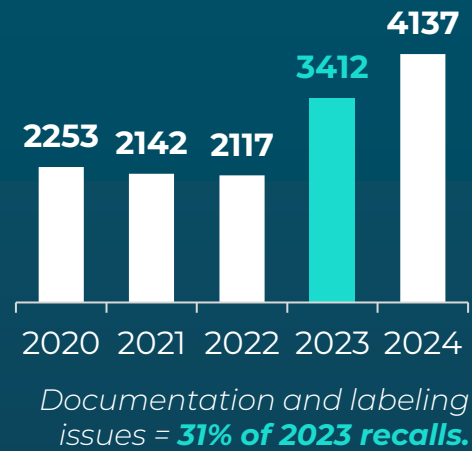
# The 6 Costly Compliance Mistakes That Block Your Products From the EU Market

What keeps thousands of shipments, listings, and contracts from reaching European consumers — and how to make sure yours isn't one of them.



# Why Compliance Failures Matter

Every week, EU customs and online marketplaces block shipments for missing documentation, incorrect labeling, or safety risks. In **2023**, the EU's Safety Gate reported **3,412 product alerts**, up 60% from 2022. Of these, nearly one-third were due to documentation or labeling non-compliance, not defective products.



For manufacturers selling D2C on Amazon, OTTO, or Temu, this means a simple oversight — like a missing EU address or wrong CE marking — can stop sales across all 27 member states overnight.

Platforms are under pressure: the General Product Safety Regulation (EU 2023/988) holds them accountable for ensuring only compliant goods reach consumers. That's why Amazon now demands DoCs, energy labels, and EPR IDs before allowing listings in Germany and France.

## THE GOOD NEWS

### **Nearly all these failures are avoidable.**

This guide summarizes the six mistakes that block EU entry most often, shows what real enforcement looks like, and provides clear actions to stay compliant.

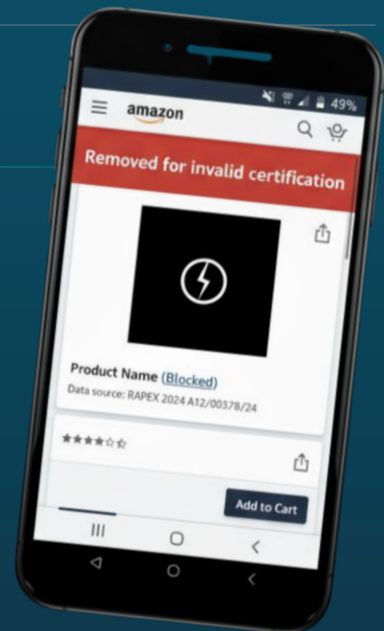
# Mistake #1: Missing or Invalid CE Marking



The CE mark is the passport for products entering Europe. Without it — or with an incorrect version — customs will detain your shipment immediately.

## A valid CE mark requires:

- o Correct application of all relevant EU directives (e.g., LVD, EMC, Toy Safety).
- o A signed Declaration of Conformity (DoC) naming those directives.
- o Use of the official CE logo (at least 5 mm high, proportional, legible).



## Real Case :

*Data source: RAPEX 2024 A12/00378/24.*

UK market surveillance documented multiple hair straightener recalls in 2022-2023 (OPSS cases 2208-0189, 2303-0098) for electrical safety failures. Products were sold via Amazon with apparent CE marking but lacked proper safety testing, resulting in account suspensions and product destruction.

## How to Avoid It :

Create one verified DoC per product family, keep harmonized standards up-to-date, and cross-check that all directives are cited correctly. Never reuse a competitor's document; authorities compare wording and signatures.

# Mistake #2:

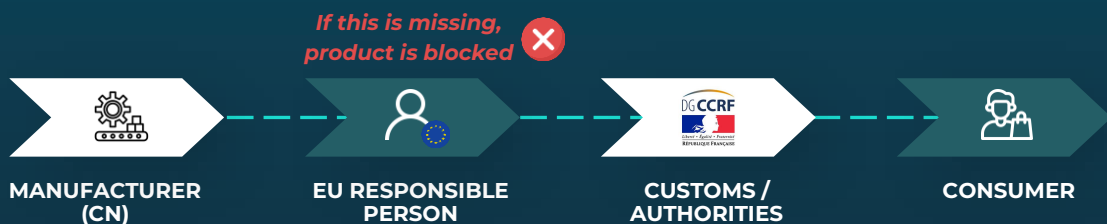
## No EU Responsible Person (GPSR)

Since December 2024, the General Product Safety Regulation requires every consumer product sold in the EU to have an EU-based Responsible Person listed on its packaging or accompanying documents.

Without this contact, customs or platforms can legally block sales.

### The Responsible Person must:

- Be established in the EU.
- Hold your technical documentation and test reports.
- Cooperate with market-surveillance authorities within 10 days.



Source : Safety Gate Alert A12/00605/24

### Real Case :

French authorities (DGCCRF) actively enforce the Toubon Law requiring French translations. GE Medical Systems was fined €500,000 for non-French documentation. GPSR enforcement since December 2024 has intensified checks for EU Responsible Person details on imported consumer goods.

### How to Avoid It :

Print an EU address on every product or instruction leaflet and sign a written mandate with your authorized representative. If you sell only through marketplaces, consider hiring a specialized compliance representative.

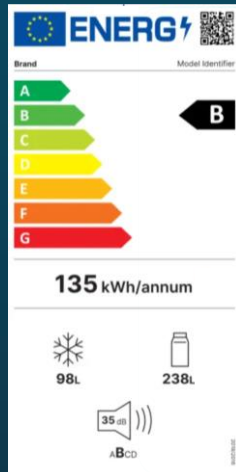
# Mistake #3: Wrong or Outdated Energy Label (EPREL)

Energy labels must use the new A–G scale introduced in 2021. Yet thousands of listings still show obsolete A+++ ratings, which are now illegal in the EU.

*Data source: European Commission – EPREL; Safety Gate Alert A12/01954/23.*

Old ❌

New ✅



Products in categories such as lighting, displays, and white goods must be registered in the EPREL database and carry:

- The QR code linking to EPREL.
- The label and product fiche in the correct format and language.

## Real Case :

The EU transition from A+++ to A-G energy labels created widespread compliance issues. Products with outdated labels faced market withdrawal across multiple EU countries. EPREL registration became mandatory for lighting products from September 2021, with non-compliant listings removed from major marketplaces.

## How to Avoid It :

Register every product model in EPREL, download the official label PDFs, and replace all old images in packaging and listings. Ensure distributors display both label and fiche to consumers online.

# Mistake #4: Incomplete Technical File or Test Reports

The Technical File proves that your product meets EU safety standards. Authorities can request it at any time — and you must deliver within 10 days. A complete file includes design drawings, risk assessments, test reports, and photos. Yet many manufacturers keep only the DoC, not the underlying evidence.



Source: Safety Gate Alert A12/00864/24 (UOKiK).

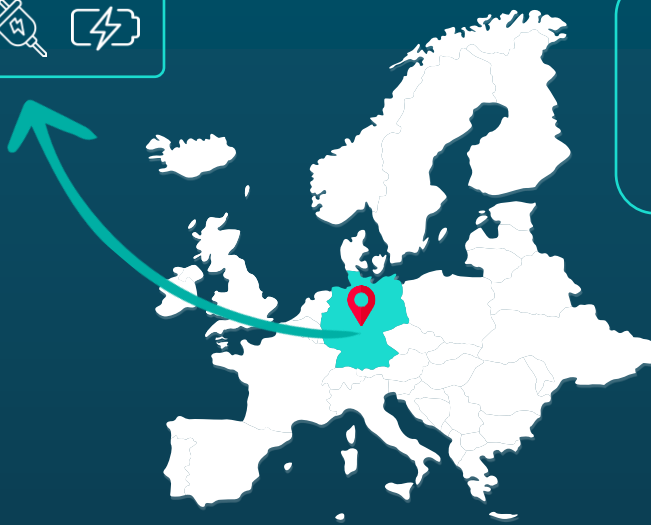
## Real Case :

EU market surveillance authorities can impose penalties up to 10% of annual turnover for serious compliance violations. Electric kitchen products frequently fail RoHS compliance checks, with documented cases showing withdrawal and destruction of non-compliant batches when technical documentation cannot be produced within the required 10-day window.

## How to Avoid It :

Keep all test reports from accredited labs (TÜV, SGS, DEKRA) in digital form. Name files by model and standard (e.g., “Model X – EN 60335-1”). If you update components, append addenda to the same file. Your EU Responsible Person must have immediate access.

# Mistake #5: Missing EPR Registration (Germany Focus)



**4000+**

Amazon accounts  
suspended (2023)



Extended Producer Responsibility (EPR) is mandatory for packaging, electronics (WEEE), and batteries (BattG). Germany enforces it aggressively through the **LUCID Register**. If you cannot provide registration numbers, marketplaces must block sales.

## Real Case :

In 2023, the German Packaging Register Foundation (ZSVR) reported over 4,000 account suspensions on Amazon.de for missing LUCID IDs. One electronics brand lost €180,000 in sales while waiting for approval.

## How to Avoid It :

Register for LUCID before listing products. Provide your WEEE and BattG numbers to Amazon via its Compliance Portal. Renew registrations annually and file volume reports each January. Include EPR icons on packaging and manuals to prove participation.

# Mistake #6: Missing or Wrong Languages (Manuals & Labels)



Source : Safety Gate Alert A12/01744/23.

EU law demands that all consumer information appear in the official language of each member state where the product is sold. This includes manuals, warnings, and labels. France and Spain are especially strict — their consumer authorities routinely fine non-French or non-Spanish instructions. Germany accepts German only.

## Real Case :

France's Toubon Law enforcement is documented and active. DGCCRF can impose fines up to €3,750 per violation for non-French consumer information. Electric heaters and other safety-critical appliances must provide French safety warnings and operating instructions, with non-compliance resulting in product withdrawal and retailer penalties.

## How to Avoid It :

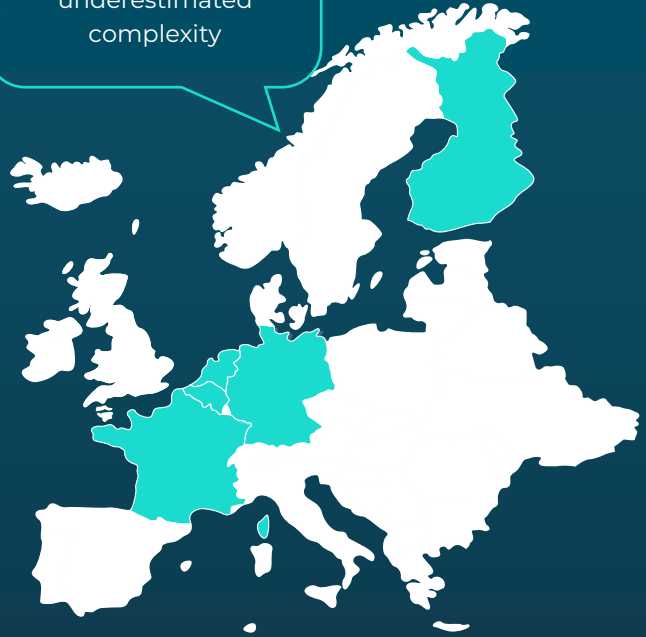
Translate manuals professionally into each required language and review for technical accuracy. Include multilingual safety icons and consistent terminology with test reports. Digital QR manuals are acceptable if authorities approve, but paper must be available on request.


# Why EU Isn't One-Size-Fits-All


Each EU country layers national complexity beyond basic EU directives:


# 73%


underestimated complexity




 **France:** Toubon Law creates criminal liability — up to €3,750 fines for non-French manuals. GE Medical Systems paid €500,000 for documentation violations. DGCCRF conducts surprise market surveillance with immediate penalties.

 **Germany:** DIN EN 82079-1 mandates specific manual structure and content. Generic translations fail compliance. ZSVR suspended 4,000+ Amazon accounts in 2023 for LUCID violations alone.

 **Belgium:** Three languages required (Dutch, French, German) with different regional enforcement authorities. Brussels, Flanders, and Wallonia each interpret requirements differently.

 **Finland:** Both Finnish AND Swedish legally required for electrical products. SFS 6002 electrical safety standard adds national requirements beyond EU directives.

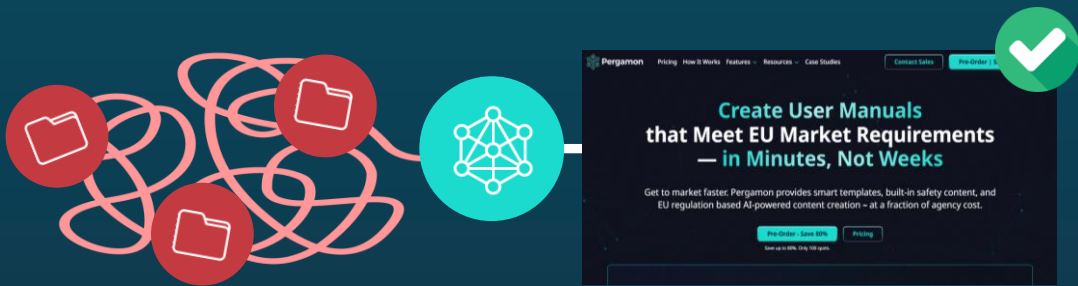
 **Netherlands:** Six EPR categories with different registration bodies and enforcement timelines.

This explains why **73% of manufacturers underestimate compliance complexity** — and why generic “EU solutions” fail in real markets.

# The Hidden Problem and Pergamon Solution

Avoiding one compliance mistake is easy; avoiding ten across multiple countries and SKUs is a constant battle. Regulations change annually, languages multiply, and one outdated DoC can bring down an entire listing.

The true challenge is not knowledge — it's maintenance. Most SMEs still store manuals, certificates, and labels in folders or emails. As teams grow, versions diverge, and critical updates get lost. When Amazon requests a DoC “within 48 hours,” panic sets in.



**Pergamon solves this structurally.** The platform centralizes documentation, tracks directive updates, and auto-generates multilingual manuals aligned with EN 82079-1. It even alerts you to EPR renewals and EPREL deadlines. You upload your product once; Pergamon keeps it compliant for you.

For SMEs, this means no missed audits and no lost sales due to admin errors — just automated compliance that lets you scale with confidence.

**“Pergamon turns compliance from a burden into a competitive advantage.”**



Pergamon®

Request Your Compliance Demo