

Selling into the EU

A practical checklist for product brands

Got your eye on a new EU market? Let's work through what needs sorting before your next move.

For UK founders and teams selling non-food consumer products into the EU, through their own shop or retail partners. Let's work out what you know, what's missing and who can help. Your products, destination countries and way of selling determine the rules. This is a starting point, not legal advice or confirmation that you're compliant.

Make a start: Work through the ten checks with your team. Tick a box when you can point to the evidence. If something doesn't apply, jot down why. Then use page 4 to pick your next three actions. It's fine to have gaps: finding them is the point.

01 Start with what you sell

Pick one product range and one EU country to work through first. Where will you keep the stock? Will you sell through your website, a marketplace or a retail partner? Write it down, even if it feels obvious. You'll use this to find the rules for your particular setup. [1, 9]

Bring it together: Your products, destination countries, sales channels and planned launch dates, together in one place.

☐ Evidence ready ☐ Needs attention ☐ Does not apply (say why)

02 Find the rules that fit

A T-shirt and a table lamp need different checks. Find the safety, chemicals and labelling rules for your product and how it will be used. Conformity assessment means checking and showing that it meets the relevant requirements. CE marking is required only where the legislation says so. Ask a product specialist about anything you're unsure of. [1, 2]

Bring it together: The rules that apply, the tests or documents you need, and the questions still to answer.

☐ Evidence ready ☐ Needs attention ☐ Does not apply (say why)

A quick note on scope: this guide covers the EU. Other European markets need their own checks. Food, medicines, medical devices and industrial products need different starting points. You'll also need to look at the tax, privacy, accessibility and other rules that apply to your business.

Bring your people and paperwork together

03 Know who is doing what

For products covered by the General Product Safety Regulation (GPSR), someone established in the EU must hold the responsible economic operator role. That means carrying out specific product safety duties. Find out who it is and agree the responsibilities in writing. Your warehouse or marketplace may have a role, but don't assume they've taken care of everything. [3, 15]

Bring it together: Names, contact details and written arrangements. Look at product safety, customs and packaging roles separately.

☐ Evidence ready ☐ Needs attention ☐ Does not apply (say why)

04 Get the paperwork out of hiding

Can you find the specifications, supplier details, safety assessments, test reports and declarations your product needs? Make sure they match what you're selling. Then check the labels, warnings, product or batch identifiers, and languages required in each country. Give the team access to the approved versions. A document called 'final_FINAL_3' deserves a second look. [3, 14]

Bring it together: An up-to-date product file and approved labels, linked to the right model or batch.

☐ Evidence ready ☐ Needs attention ☐ Does not apply (say why)

05 Give your packaging some attention

Include every component, with its material and weight. Extended producer responsibility (EPR) makes producers responsible for aspects of packaging waste management, including funding. Check whether you're the producer in each country and which registrations, reports, fees or representatives you need. The Packaging and Packaging Waste Regulation (PPWR) began applying in phases on 12 August 2026. Some requirements have later dates. [4, 5]

Bring it together: Your packaging list and a country-by-country plan. A UK registration doesn't cover EU obligations.

☐ Evidence ready ☐ Needs attention ☐ Does not apply (say why)

06 Make sure your claims hold up

Read your packaging, product pages and adverts with the evidence beside you. Empowering Consumers rules began applying on 27 September 2026. Broad claims such as 'eco-friendly' face a specific test for legally recognised excellent environmental performance. Some supporting data won't automatically meet it. Review sustainability labels and climate claims based on offsets too, and check how each country has implemented the rules. [6, 7]

Bring it together: Each claim, what it refers to, its supporting evidence and who approved the wording.

☐ Evidence ready ☐ Needs attention ☐ Does not apply (say why)

Think through the sale and what comes next

07 Try shopping on your own website

Look at what a customer can see before paying: required product details, manufacturer and EU responsible person contacts, warnings, prices, delivery, returns and guarantees. Customers buying goods online generally have 14 days from delivery to change their mind, with exceptions. Include the new EU legal guarantee notice. Check whether GARAN, the label for qualifying longer durability guarantees, applies too. [3, 6, 8]

Bring it together: Reviewed product pages, checkout and returns information. Arrange separate checks for privacy and website accessibility.

☐ Evidence ready ☐ Needs attention ☐ Does not apply (say why)

08 Know what lands on the bill

Ask your customs and VAT advisers to confirm the commodity code (your product's customs classification), origin, importer, registrations and declarations. Agree how VAT works and who pays which charges. Sending something from the UK doesn't automatically make it UK-origin for reduced tariffs. Check current duty and parcel charges for your shipping route before setting prices. [9, 10]

Bring it together: The agreed import and VAT arrangements, plus your full costs, including compliance, delivery and returns.

☐ Evidence ready ☐ Needs attention ☐ Does not apply (say why)

09 Put the right dates in the diary

Digital Product Passports (DPPs) hold product information digitally. Requirements arrive through different product rules, so check your category before buying software. For textile apparel, Q4 2027 is when the detailed rules are planned for adoption. It isn't a deadline for every brand to have a passport. The final legislation will set the requirements and timing. [11, 12]

Bring it together: Relevant dates with their official sources, clearly marking provisional ones. Start bringing supplier and product records together now.

☐ Evidence ready ☐ Needs attention ☐ Does not apply (say why)

10 Keep it working when someone is away

Who updates the records when a supplier changes? Who handles a safety complaint? Agree the answers, including who covers holidays. Your team needs to know how to find affected products and deal with incidents or recalls. Take corrective action and notify authorities when the applicable safety rules require it. [13, 15]

Bring it together: An owner, a deputy, a review date and a process everyone involved can find and follow.

☐ Evidence ready ☐ Needs attention ☐ Does not apply (say why)

Your next three actions

Keep your first pass manageable: one product range, one country. Pick three things to sort and give each one a person, a date and a clear finish.

Product range

EU country and sales route

Review owner and date

Action 1

What needs sorting

Who and by when

How we will know it is done

Action 2

What needs sorting

Who and by when

How we will know it is done

Action 3

What needs sorting

Who and by when

How we will know it is done

What comes first: Deal with known safety concerns and unmet legal requirements. Then tackle the missing evidence and registrations for your launch. Give future preparation its own timetable. Keep every unresolved requirement on your list, even if it isn't one of today's three actions.

Let us work through the sustainability questions

I'm Rodica. I help brands get to grips with EU sustainability requirements and put them into practice, including packaging, environmental claims and DPP preparation. My specialist background is fashion and textiles. We'll work through what this means for your business together.

Talk to Rodica at rodicamurphy.com/contact

Tell me what you sell, where you want to sell it and what has you scratching your head. Product safety, customs, tax and legal questions may need their own specialist.

Official sources and scope

Want to check the detail? The numbers in the checklist point to these official sources, checked on 28 September 2026. Revisit them before a launch or a change to your products or sales arrangements.

1. EU product rules and compliance

Your Europe. Starting point for rules by product category.

2. CE marking

Your Europe. When the marking is required and when it must not be used.

3. General Product Safety Regulation

Regulation (EU) 2023/988, current consolidated text. Articles 9, 16 and 19.

4. Packaging and Packaging Waste Regulation

Regulation (EU) 2025/40. Articles 44 and 45 cover producer registration and responsibility.

5. Packaging rules begin to apply

European Commission, 11 August 2026. Explains phased application.

6. Empowering Consumers and guarantee information

European Commission. Directive (EU) 2024/825 and the EU guarantee notice and label.

7. Questions and answers on environmental claims

European Commission services, September 2026. Explanatory guidance, not a binding legal interpretation.

8. Online sales to consumers

Your Europe. Pre-contract information, cancellation and delivery.

9. Importing goods into the EU

Access2Markets, European Commission. Customs, origin and product requirements.

10. VAT One Stop Shop

European Commission. VAT schemes and eligibility for cross-border sales.

11. Digital Product Passports for businesses

European Commission. Product scope, responsibilities and staged introduction.

12. Digital Product Passports for textile apparel

European Commission. Planned adoption in Q4 2027; timing remains indicative.

13. Selling products safely

Your Europe, checked by publisher 19 August 2026. Corrective action and reporting.

14. Manufacturer importer and distributor duties

Your Europe, checked by publisher 13 July 2026. General product compliance.

15. Product safety guidance for businesses

Commission Notice C/2025/6233, November 2025. Practical guidance on the GPSR.

Use the sources to follow up the legal points. The evidence lists and worksheet are my suggestions for getting organised. This checklist can help you find questions to answer; it cannot confirm your business is compliant or replace checks for your products and countries.