Pergamon

Your Roadmap to Selling in Europe — Without Compliance Headaches

A seven-step blueprint to enter Europe confidently, meet every regulatory requirement, and protect your brand from customs delays and marketplace bans.

Why You Need a Roadmap

Pergamon®

Europe offers access to over 450 million consumers, but it's also the world's most complex compliance landscape. Every product sold must meet EU safety, labeling, and environmental regulations. One missing document can halt sales across all EU countries.

31%
of EU recalls = paperwork issues

(Source: Safety Gate 2024)

In 2023, 31% of EU product recalls were caused not by defects, but by incomplete documentation, missing CE marks, or language violations (EU Safety Gate Annual Report 2024).

Prototype

Market

Idea

Test
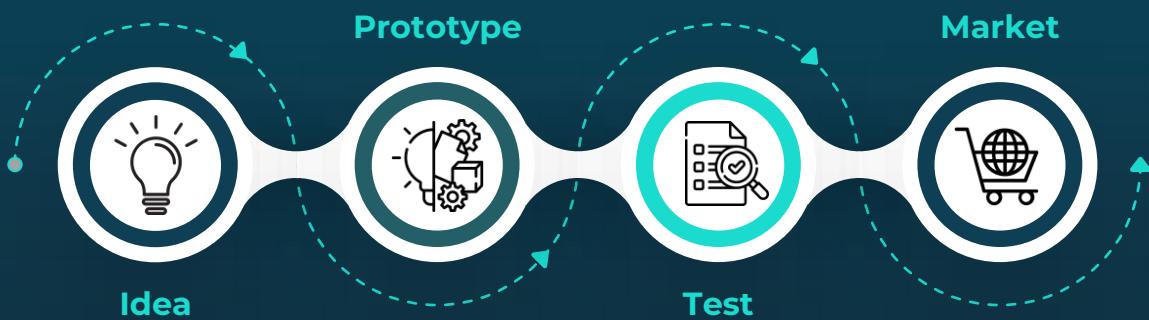
Platforms such as Amazon and OTTO now act as regulators, requiring Declarations of Conformity, EPR registration numbers, and Responsible Person details before products can be listed.

A roadmap gives manufacturers a clear process to follow — reducing uncertainty, avoiding repeated mistakes, and enabling faster expansion across EU markets.

Step 1: Define Your Regulatory Scope

Start by identifying which EU laws apply to your product category. Each has its own safety and documentation requirements:

Product Type	Directive	Example Requirement
Electronics	Low Voltage Directive (2014/35/EU), EMC Directive (2014/30/EU), RoHS (2011/65/EU).	Must include CE marking, test reports, and safety documentation
Toys	Toy Safety Directive (2009/48/EC).	Include age warnings and CE mark
Wireless devices	Radio Equipment Directive (2014/53/EU).	Must support frequency compliance and documentation
Household appliances	Ecodesign and Energy Labelling Regulations.	Must display energy efficiency label
General goods	General Product Safety Regulation (EU 2023/988).	Proof of safe design and labeling

Safety Gate reference A12/02157/23

Country nuances also matter:

🇫🇷 France enforces French-only manuals

🇩🇪 Germany enforces packaging registration via LUCID

🇪🇸 Spain's authorities inspect importer labels for traceability.

Real Case :

Spanish consumer protection authorities actively enforce labeling requirements in Spanish. Vacuum cleaners and household appliances must display safety warnings, energy consumption data, and operation instructions in Spanish. Non-compliance can result in customs holds, product withdrawal, and significant penalties for importers and distributors.

Step 2: Design for Compliance

Integrate compliance into your design phase. Fixing issues after production is costly and delays launch.

Apply harmonized **EN standards** early — e.g. EN 60335 for electrical safety, EN 71 for toys, EN 55014 for EMC. Compliance with these standards gives a "presumption of conformity," recognized by EU authorities.

Ensure materials meet chemical safety rules under **REACH** and **RoHS**. Avoid restricted substances such as lead, cadmium, or certain phthalates.

Real Case :

German Federal Institute for Risk Assessment (BfR) regularly tests kitchen utensils for REACH compliance. Phthalate violations in food-contact materials are a frequent cause for product withdrawal. Even products claiming compliance can face recall if post-market testing reveals non-conformity with harmonized standards.

Source : Safety Gate Alert A12/00411/24

Tip :

Document design decisions that reduce risk (e.g. heat-resistant materials, safe shapes, insulation choices). These records belong in your Technical File later.

Step 3:
Appoint Your EU Responsible Person

Under the **General Product Safety Regulation**, every product sold in the EU must list an **EU-based Responsible Person** on packaging. This person acts as your official compliance contact and must provide documentation within 10 days if requested by authorities.

Choose between :

Source : Safety Gate Alert A12/00845/24

- o **Importer:** If you sell through a distributor who takes legal ownership.

- o **Authorized Representative:** If you sell D2C via marketplaces or fulfillment centers (e.g., Amazon FBA).

The Responsible Person's name and address must appear on product packaging or user instructions.

If this is missing, product is blocked ❌

MANUFACTURER (CN) → **EU RESPONSIBLE PERSON** → **CUSTOMS / AUTHORITIES**

Nederlandse Voedsel- en Warenautoriteit
Ministerie van Landbouw, Natuur en Voedselkwaliteit

Real Case :

Netherlands Food and Consumer Product Safety Authority (NVWA) enforces GPSR requirements for EU Responsible Person labeling. LED lighting products are frequently targeted for compliance checks, with particular attention to products from online marketplaces lacking proper EU contact information on packaging.

Step 4: Testing and Certification

Testing verifies compliance and protects you from costly recalls. Use **accredited EU-recognized labs** such as TÜV, DEKRA, SGS, or Bureau Veritas.

Key tests by product:

- Electrical safety (EN 60335, EN 61010)
- EMC interference (EN 55014, EN 55032)
- Chemical content (REACH, RoHS)
- Mechanical and stability tests (for toys or furniture)

Store all certificates and test reports in your Technical File.

Prototype

Test

Certification

Launch

Real Case :

Poland's UOKiK (Office of Competition and Consumer Protection) has documented authority to test electronic products for EMC compliance. Portable chargers frequently fail electromagnetic compatibility requirements, with testing revealing safety risks including electrical leakage. Missing or invalid test reports result in immediate market withdrawal.

Step 5: Labeling and Manuals

Before shipping, review all packaging and manuals for EU conformity:

o CE mark (≥5 mm) and correct directives.

o Manufacturer/importer name and address.

o Model number and batch ID.

o Safety warnings and pictograms.

o User manual in every sales country language.
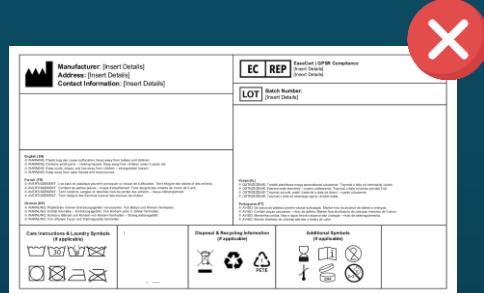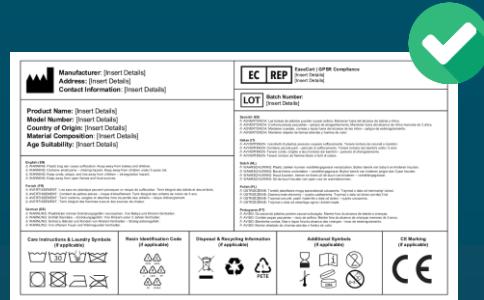
Country-Specific Manual Requirements:

Germany: Must reference DIN standards in technical sections

France: Safety warnings require specific French legal language ("DANGER" not "ATTENTION")

Belgium: All three languages (Dutch/French/German) required on packaging

Finland: Finnish AND Swedish legally mandated for electrical products

Italy: Courts limit translation scope but full localization safer approach

Real Impact :

A kitchen appliance manual that works in Germany will violate French law without proper localization. One importer spent €15,000 re-translating 3,000 manuals after French customs rejection. This complexity explains why generic "EU translations" fail compliance — and why professional localization prevents costly corrections.

Step 6: Register for EPR and EPREL

Two EU databases determine whether your products can legally stay on marketplaces:

○ **EPR (Extended Producer Responsibility):** Covers packaging (LUCID in Germany), electronics (WEEE), and batteries (BattG).

○ **EPREL (Energy Labelling):** Required for lighting, displays, and white goods since 2021.

EPR IDs (Packaging, WEEE, Batt)

↓

amazon

EPREL QR label

↓

Consumer

Sources: ZSVR Annual Report 2023; Safety Gate A12/01954/23.

Real Case :

Germany's ZSVR (Central Packaging Register) documented over 4,000 Amazon account suspensions in 2023 for missing LUCID registration. Italy's Ministry for Economic Development (MiSE, now MiMIT) enforces EPREL registration requirements for lighting products, with non-registered products facing marketplace removal and potential penalties.

Action :

Register before listing. Provide IDs to marketplaces. Renew annually.

Country Enforcement Patterns You Need to Know

EU enforcement varies dramatically by country and timing — smart manufacturers prepare for known patterns:

Jan Feb Mar Apr May Jun Jul Aug Sep Oct Nov Dec

Germany: LUCID registration checks occur quarterly with immediate marketplace suspensions. Battery law enforcement peaks in January during annual reporting season.

France: DGCCRF conducts surprise market surveillance year-round, with intensified campaigns during back-to-school and holiday seasons. €3,750 fines issued on-site.

Spain: Regional authorities coordinate differently — Catalonia and Madrid show highest enforcement activity. Vacuum cleaners face frequent labeling inspections.

Netherlands: NVWA runs annual testing campaigns targeting specific product categories. 2024 focused on LED lighting and small appliances.

Poland: UOKiK responds fastest to consumer complaints, often within 48-72 hours of first report.

Cross-border: Safety Gate alerts trigger multi-country enforcement within 48 hours, but follow-up actions vary significantly by national authority capability.

Smart manufacturers monitor enforcement calendars and prepare documentation before inspection periods, not after violations occur.

"Know the patterns, avoid the traps."

From Roadmap to System:
Pergamon Solution

Following this roadmap ensures safe, compliant products — but maintaining it manually is hard. Each SKU, language, and directive update multiplies workload.

That's where **Pergamon** transforms the process.

Create User Manuals that Meet EU Market Requirements — in Minutes, Not Weeks

Get to market faster. Pergamon provides smart templates, built-in safety content, and EU regulation based AI-powered content creation – at a fraction of agency cost.
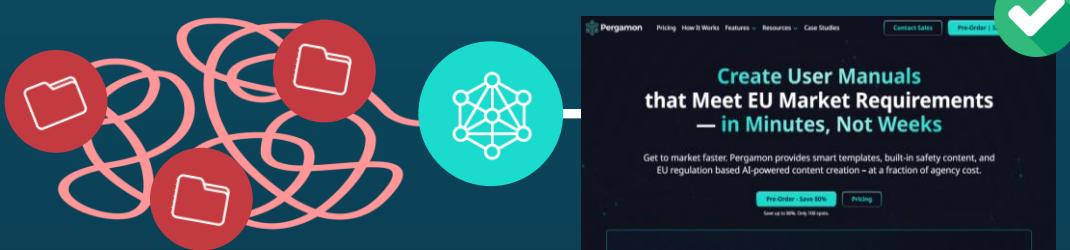
o Centralizes all manuals, DoCs, and test reports.

o Auto-generates multilingual instructions compliant with EN 82079-1.

o Tracks EPR renewals and EPREL updates.

o Alerts you to upcoming directive changes.

For SMEs selling on Amazon or OTTO.de, Pergamon acts as a compliance command center. Instead of reacting to platform alerts, you operate proactively with always-up-to-date documentation.

"Pergamon turns your compliance roadmap into an automated workflow — so nothing slips through the cracks."

Pergamon® | **See how Pergamon keeps your EU listings always compliant.**