



From OEM to OBM — The Ultimate Guide to EU-Compliant Manuals for Imports from China

How manufacturers and importers can move from contract production to full brand ownership — while meeting every EU requirement for user manuals, labeling, and documentation.

Compliance is your brand passport.

Introduction: Why OEMs Struggle in EU

Many Chinese OEMs already produce for European brands under private-label contracts. But once they decide to sell under their own brand (OBM), they suddenly face the full legal obligations of an **EU manufacturer or importer**.

The most common pitfall? **Incomplete or non-compliant user manuals**. EU authorities treat manuals as safety documents, not marketing material. If the content or language is wrong, the whole shipment can be refused entry.

Under EU law, the importer or brand owner is responsible for ensuring every product:



Has a CE mark based on valid testing and a signed Declaration of Conformity.



Includes a compliant manual following EN 82079-1.



Is labeled with an EU-based Responsible Person address.

OEM

OBM

“A product without a compliant manual is legally incomplete.”

Source: ExamineChina 2024.

Understanding Importer Obligations

Importers and OBM's carry the same liability as EU manufacturers.

The General Product Safety Regulation (EU 2023/988) and Market Surveillance Regulation (EU 2019/1020) make them responsible for:

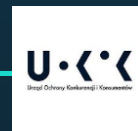
- Conformity with all relevant directives (LVD, EMC, Toy Safety, etc.)
- Keeping technical documentation and test reports on file for 10 years.
- Ensuring manuals and labeling are in the language of each destination country.

If customs or market authorities find a missing or incorrect manual, they can:

- Stop or seize shipments.
- Order a recall of products already sold.
- Impose financial penalties on both importer and manufacturer.



Source UOKiK 2024.



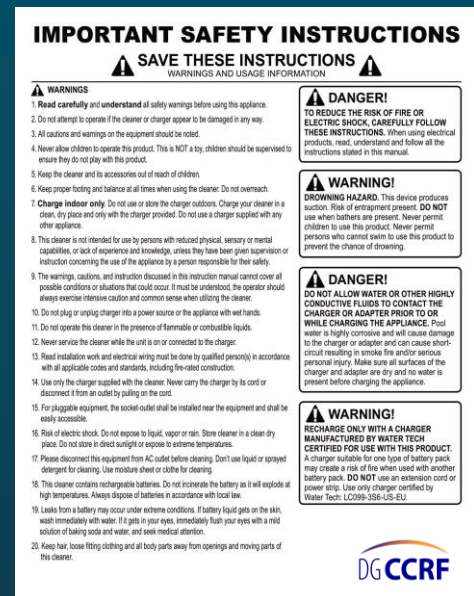
Real Case :

In 2023, Polish authorities (UOKiK) ordered withdrawal of a large batch of electric kettles imported from China after inspectors found that the safety instructions were available only in English. The importer was fined and faced return of non-compliant products. Polish law explicitly requires Polish-language manuals for all household appliances.

What a Compliant User Manual Must Include

According to **EN 82079-1**, an EU-compliant user manual must:

- Describe safe installation, operation, and maintenance.
- Contain clear safety warnings in each EU language of sale.
- Match the product configuration tested for CE marking.
- Include manufacturer/importer contact details and model identification.
- Be durable — printed, digital (QR code), or both.



Authorities often call the manual “part of the product.” If it is missing or incorrect, the product is considered unsafe.

Real Case :

French authorities recall USB chargers and other electronics yearly for incomplete or insufficient safety instructions. In 2023, DGCCRF announced the withdrawal of non-compliant USB chargers with missing French-language safety information—enforcement covered well-known e-commerce sellers and physical retailers alike.

Common Failures When Importing from China

Typical mistakes that block customs clearance or cause returns:

- ✓ Manuals written only in English.
- ✓ Copy-pasted warnings not matching test reports.
- ✓ Outdated directives listed (e.g., old 2014/30/EU references).
- ✓ Missing EU address or Responsible Person.
- ✓ Low-quality translations made by machine tools.



Real Case :

In 2022, Spanish customs authorities blocked entry of a shipment of electric heaters from Asia after the provided manual referenced outdated voltage ranges and obsolete EU directives. The shipment was refused and returned, with the importer required to supply updated documentation before entry.

Tip :


Prevention is always better than re-shipment. An importer should verify manuals before loading, not after arrival.


Language, Symbols & Labeling Rules

Each EU country requires the manual and product information in its official language.



 **France:** French only (Art. R221-3 Consumer Code).

 **Germany:** German only (ProdSG §6).

 **Spain / Italy:** respective national languages.

“Each country = its own language rule.”

Mandatory symbols include CE, WEEE (bin), battery recycling, and appropriate hazard pictograms.



Real Case :

In 2023, Italian customs detained and later destroyed a large consignment of LED lighting products imported from China because the safety instructions and warning labels were not provided in Italian, violating national product safety standards.

How to Audit Your Supplier's Manuals

Before shipping, perform a **documentation audit**:

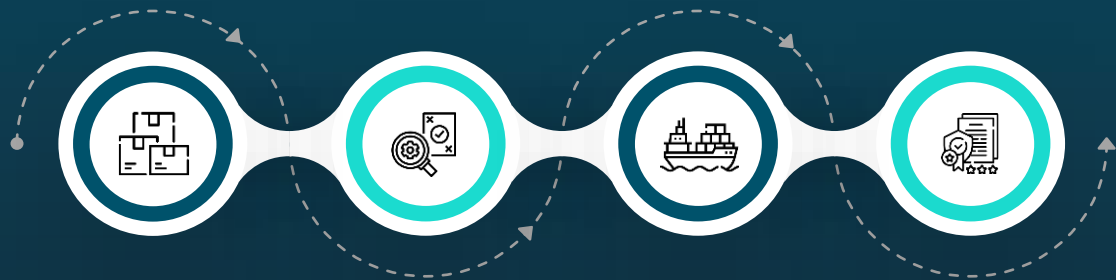
- Check that the manual references current directives and standards.
- Verify that the language list matches your target markets.
- Ensure safety warnings are consistent with test reports.
- Confirm the importer's EU address is printed clearly.
- Keep digital copies for each model and version.

Pre-shipment audit

Correction

Shipment

Compliance



Use third-party inspection services or internal auditors familiar with EN 82079-1. Request photos of the manual pages during the Final Random Inspection (FRI).

Real Case :

An Amazon.de seller avoided a costly product recall after their compliance team caught a translation error in the safety instructions during final inspection. Investing €300 to correct the manual prevented thousands in potential losses and withdrawal of product listings—a common risk for new entrants to EU markets.

Building Brand Value Through Documentation

Moving from OEM to OBM is not only about logos — it is about **trust**. European buyers view documentation quality as proof of brand maturity.

A professional, multilingual manual:

- o Builds confidence with distributors and marketplaces.
- o Reduces return rates and support costs.
- o Protects against liability claims.
- o Shows commitment to consumer safety.

Investing in compliant manuals signals that your brand operates at EU standards, not just production standards.

OEM	OBM
English-only 	Multilingual 
Low quality 	Branded 
Non-compliant 	Compliant 

“In Europe, your documentation is as important as your product.”


— EU Market Surveillance Inspector

The OEM → OBM

Compliance Checklist

Use this checklist to confirm your product is ready for EU sales.

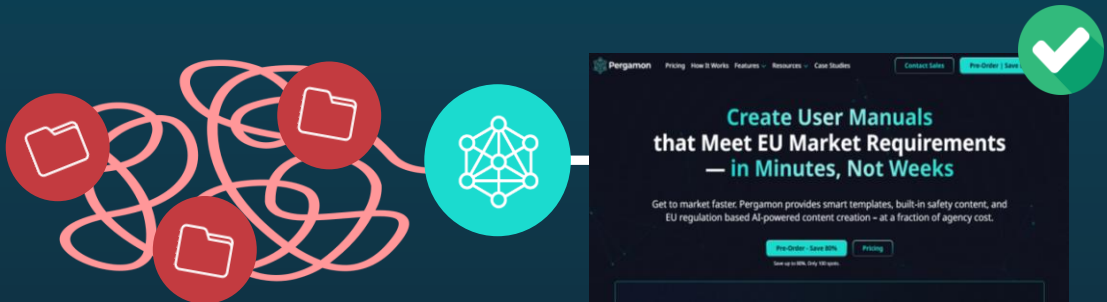
Model example — what 'ready for EU' looks like

	Item	Status
CE mark correctly applied		
DoC signed and up to date		
Manual follows EN 82079-1 structure		
Translations for DE / FR / ES / IT complete		
Importer / EU address on packaging		
EPR registrations (packaging / WEEE / batteries) active		
QR code / digital manual link works		
Product photo + manual filed in technical file		
Final inspection includes manual review		

Pergamon: The Ultimate Manual Solution for OEMs & Importers

Manual compliance no longer needs to slow your business. **Pergamon** automates the creation of multilingual, regulation-compliant manuals for all your imported products.

- o Built on EN 82079-1 and current EU directives.
- o Generates manuals in 25 + languages instantly.
- o Integrates CE marking, labeling, and safety icon templates.
- o Updates automatically when EU regulations change.
- o Produces printable PDFs and QR-based digital manuals.



Whether you are a Chinese OEM transforming into an OBM or an importer building your own brand, Pergamon eliminates the complexity of compliance and ensures every shipment arrives EU-ready.

“With Pergamon, one update corrects every manual — across languages, brands, and products.”



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