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Introduction to General Product Safety Regulations (GPSR)

Background

The General Product Safety Regulation (GPSR) is a key instrument in the EU product safety legal framework, and replaced the former General Product Safety Directive and the Food Imitating Product Directive from 13 December 2024. It modernises the framework and addresses new challenges posed to product safety by the digitalisation of our economies.

The GPSR requires that all consumer products on the EU market – or at least all those not covered by more specialist legislation – are safe for their intended use and users, and it establishes specific obligations for businesses to ensure this safety, and to provide warnings where there are hazards.

What does this mean for the book industry supply chain?

Under the Regulation, the *manufacturer* bears the responsibility to ensure any products placed on the market are safe by design. Manufacturers have an obligation to ensure that their products are safe by design under normal or foreseeable conditions. But this terminology may be misleading: the manufacturer is the brand owner who has a product designed or manufactured, and who places the product on the market under their name or trademark. In the case of books, the *publisher* would normally be seen as the manufacturer, as they are designing the product and placing it with a printer to have it physically made.

Manufacturers (that is, publishers) are required to:

1. Conduct a risk assessment,
2. Maintain comprehensive technical documentation, demonstrating product safety, and retain this information for 10 years,
3. Mark products with type (book), batch (for example, an impression number), and ISBN so products can be recalled if necessary. The batch number for POD and short run product is more likely to use a barcode inside the back of the book to identify when and where the book was printed,
4. Include the name and contact address (both postal and electronic) of the manufacturer and their in-EU authorised representative, in the product or on the packaging of the product in the EU. Contact details are also necessary in the metadata for online sales,
5. Provide clear instructions and safety information unless the safe use is guaranteed without these documents,
6. Maintain an internal register of complaints related to accidents concerning the safety of products, product recalls and any corrective measures taken to bring the product into conformity. Any personal data held to investigate the complaint should only be kept for the purpose of the investigation and in any event no longer than 5 years.

Publishers need to work out how they are going to manage the six points above, as the onus is on them to comply with the regulations. This will often require an update to the imprint page and the need to have a responsible representative in the EU.

With regard to a representative in the EU:

1. Some organisations that already have an EU subsidiary may feel able to appoint that subsidiary as the Responsible Person,
2. Many businesses are offering 'safety representation as a service', but the price point is wildly different and includes different options. Some, for example, offer assessments of product safety as part of having the product portfolio details on hand in case of issues. Publishers will need to conduct their own research and take independent advice,
3. Publishers should talk to their printers as they may well be offering a service to help,

4. E-commerce is an area of concern and publishers need to ensure a Declaration of Conformity for each product is loaded onto e-commerce sites such as Amazon, eBay and other retailers. Otherwise, there is a risk that their products could be delisted from European sites. UK sites should be unaffected, but it's worth noting that under GPSR, these rules affect sales to Northern Ireland so we should not assume UK sites will be unaffected indefinitely.

The good news is that books can generally be considered to be a 'safe product' under the definition in article 3 of the regulation which clarifies – “‘safe product’ means any product which under normal or reasonably foreseeable conditions of use, including the actual duration of use, does not present any risk or only the minimum risks compatible with the product’s use, considered acceptable and consistent with a high level of protection of the health and safety of consumers.” Books for very young children are subject to special requirements which may for example include rounded corners, and some novelty items may also be subject to the Toy Safety Regulation.

The section above has been adapted from the GPSR guide created by BIC member CPI. Documentation linked at the end of this BIC Bite gives CPI’s perspective.

How ONIX can help with GPSR

ONIX users can deliver the necessary contact details in one of three places in an ONIX Product record

- in <ProductContact> in Block 4 for the publisher or publisher’s representative (for contacts that apply everywhere the product is sold),
- in <ProductContact> in Block 6 for an in-EU ‘local publisher’/affiliate, sales agent or other publisher representative (for contacts that apply in a specific market, e.g. in the EU),
- or for an importer/EU distributor using the more-or-less identical <SupplyContact> in Block 6.

In ONIX 3.1, the above contact details can include postal addresses, for example like this, taken from EDItEUR’s [notes](#) on the changes introduced in revision 3.1.2 in 2024:

```
<ProductContact>
  <ProductContactRole>10</ProductContactRole>
  <ProductContactName>Mondadori Libri SPA</ProductContactName>
  <ContactName>Giacinta Zampa</ContactName>
  <EmailAddress>g.zampa@mondadorilibri.it</EmailAddress>
  <StreetAddress>Via Mondadori 1</StreetAddress>
  <LocationName>Segrate</LocationName>
  <PostalCode>MI 20090</PostalCode>
  <CountryCode>IT</CountryCode>
</ProductContact>
```

This does not apply to ONIX 3.0. However, there is a temporary workaround for those still using 3.0, using <SupportingResource> with <ResourceContentType> code [53](#), and linking to a simple text file (not a web page or PDF file) containing the necessary contact details. Note that this workaround is temporary, and not as effective as delivering address details in structured form using release 3.1. Not all recipients will accept the workaround.

Further product safety detail in ONIX

EDItEUR’s application note about the EU’s General Product Safety Regulation (GPSR) includes additional information about toy safety declarations (an updated Toy Safety Regulation replaced the older Toy Safety Directive in Jan 2026) and details for products that contain or include batteries. Read the updated application note at [https://www.editeur.org/files/ONIX 3/APPNOTE Product safety requirements in ONIX.pdf](https://www.editeur.org/files/ONIX%203/APPNOTE%20Product%20safety%20requirements%20in%20ONIX.pdf).

Important points to note:

1. Under the Regulation it is up to publishers to make sure their products are compliant, and to retain the relevant documentation
2. Publishers will need to appoint an in-EU representative for safety matters

Helpful websites:

https://commission.europa.eu/business-economy-euro/doing-business-eu/eu-product-safety-and-labelling/product-safety/general-product-safety-regulation_en

<https://www.productcompliancesupport.co.uk/general-product-safety-regulations-2024-an-overview/>

For ONIX: <https://www.editeur.org> and [https://www.editeur.org/files/ONIX 3/ APPNOTE Product safety requirements in ONIX.pdf](https://www.editeur.org/files/ONIX%203/APPNOTE%20Product%20safety%20requirements%20in%20ONIX.pdf)

From CPI: https://www.communicator.co.uk/login/Instances/cpicolourlz/Documents/generalproductsafetyregulationgpsr_1.pdf

The information contained within this document is not intended to be considered as legal advice. BIC recommends readers consult with their legal advisors to understand how the requirements of GPSR apply to their particular business.

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