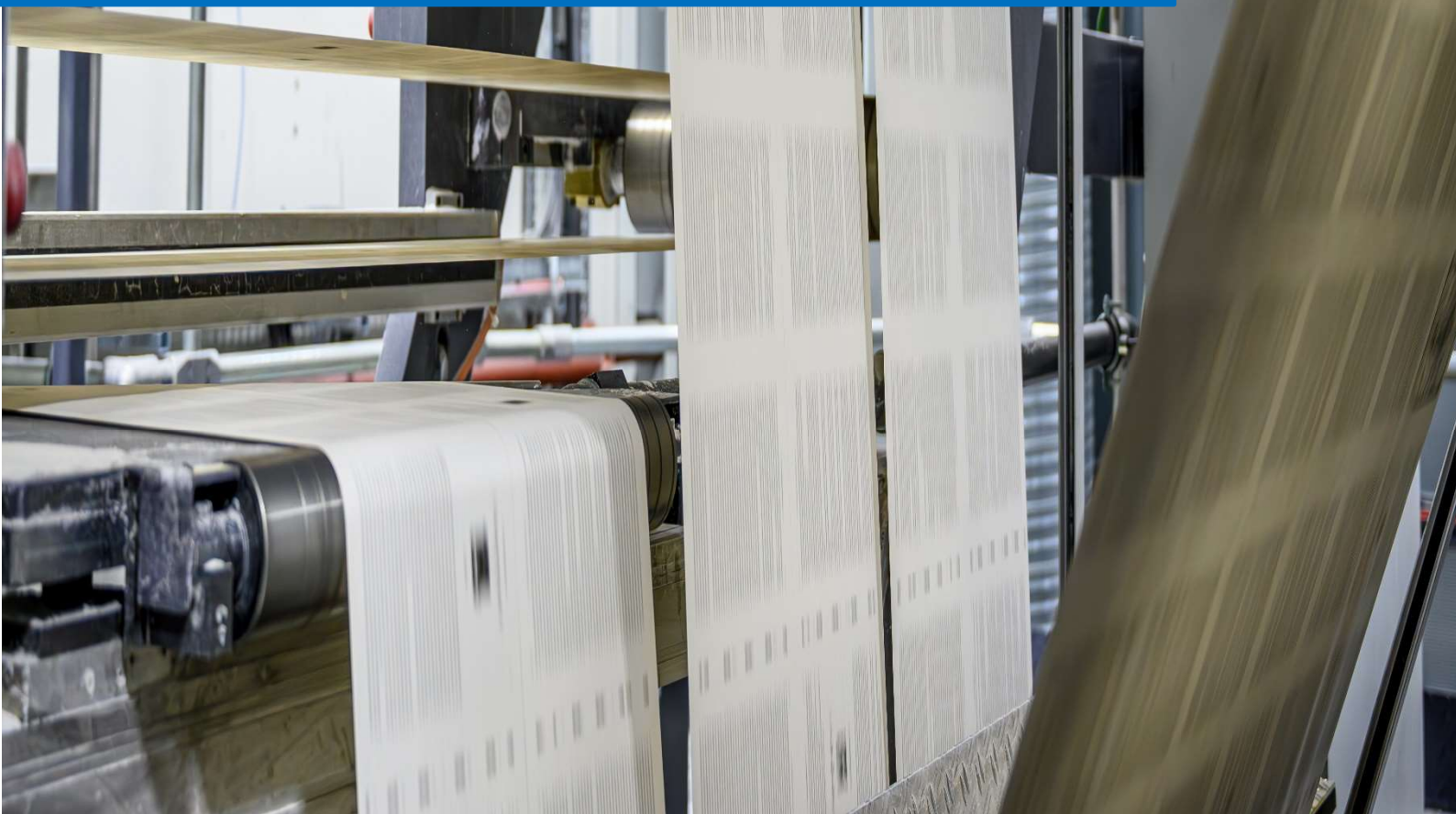




# GENERAL PRODUCT SAFETY REGULATION (GPSR)

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Clays  
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## Introduction

This document is designed to provide a simple explanation of how GPSR might affect the books you print at Clays.

The information is our interpretation of the regulations. However, please note that we are not experts in this subject and, to ensure compliance, recommend that publishers seek independent advice. As such, we are unable to provide recommendations for independent advisers, nor can we offer advice on the legal implications of the legislation for your business.

## What is GPSR?

General Product Safety Regulations (GPSR) is legislation within the European Union (EU) that ensures consumer safety for a wide range of products including books. The definition of books is a general one, with no further subdivision into product categories such as monochrome, colour or board.

From 13<sup>th</sup> December 2024 all products will be affected by this legislation. You can view the full GPSR document here - <https://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=CELEX:32023R0988>

We would suggest “Article 3, subsections 2 and 8” are particularly relevant as they further define what is considered to be a safe product and who is responsible for adherence to the regulations.

Within this document “manufacturers” of products are defined as:

*“Any natural or legal person who manufactures a product or has a product designed or manufactured and markets that product under that person’s name or trademark”.*

Therefore, the book publisher is the “manufacturer” and has an obligation to ensure that their product is a “safe product”, defined as:

*“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”.*

We would suggest that Article 9 “Obligations of Manufacturers” is looked at in further detail as this helps explain what internal steps you might wish to follow.

## What Information might be needed?

If books are not to be sold in the EU, there is no obligation to comply with this legislation. Should books be destined for sale within the EU, compliance may be required and specific information applied to the imprint pages. For example:

- Publisher name and address
- ISBN
- Year of publication or Impression number
- Printer location details
- Any relevant safety information - If applicable, provide any relevant safety warnings or information, especially if the content could pose a risk (e.g., for children).
- An EU Conformity Declaration - such as a statement of your choosing regarding the product and how it relates to the GPSR regulations
- An EU authorised representative statement - both physical and electronic

Much of this may already be on your imprint page however some of the information may not be.

In addition, if the books are to be sold in an EU market by a publisher who is not based in an EU member state e.g. a UK publisher wanting to sell books in France or Germany, then you must appoint an authorised EU representative who will act on your behalf in matters of compliance and communication with the regulatory authorities.

Unfortunately, Clays are unable to assist publishers with recommendations or advice on appointing an authorised EU representative.

Further information for publishers and what they should consider internally is detailed within the full GPSR documentation linked above; Section 1 Article 9.



## Next Steps

If you already have an EU address or an EU Authorised Representative

- Check there is a postal address
- Check there is an email or website address
- Review if you want to include a statement on EU product safety and how consumers can find out more information (for example via your website)
- Speak to us about updating imprint pages and how we can make this as efficient as possible

If you use a UK address or have no EU Authorized Representative

- Review if you want to appoint an EU Authorized Representative
- Review if you have alternative options such as the “importer” or sister companies within your group
- Speak to us about updating imprint pages and how we can make this as efficient as possible

## How can we help?

Having made your own assessment of these regulations and if you decide that you do want to make amendments to your imprint page, then we would suggest the following workflow could be adopted.

### New Titles

- Imprint pages should be supplied with any amendments already incorporated

### Reprints

- We can introduce an automated instruction for our pre-press team to update the imprint page with a pre-agreed statement which we hold as a “patch”
- The “patch” and standard positional information is supplied by publishers and then held as a PDF to ensure that consistency is achieved and reduces the need for interpretation which might lead to an error
- Charges will apply as per your scale or estimated cost



## Summary

We hope this document has been useful and goes a little way to helping navigate through this new piece of legislation.

Once again, the information in this document is our interpretation of the regulations. However, please note that we are not experts in this subject and, to ensure compliance, recommend that publishers seek independent advice.

As ever we would love to speak to you if you have any questions or would like to move forward. Our sales team look forward to hearing from you.

## Further Information

If you require further assistance, please contact your sales representative. Alternatively, we can be contacted at [sales@clays.co.uk](mailto:sales@clays.co.uk) and on 01986-893-211.

For further information on GPSR please visit:

- [https://commission.europa.eu/business-economy-euro/doing-business-eu/eu-product-safety-and-labelling/product-safety/general-product-safety-regulation\\_en](https://commission.europa.eu/business-economy-euro/doing-business-eu/eu-product-safety-and-labelling/product-safety/general-product-safety-regulation_en)

