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EU market readiness checklist for manufacturers

A practical readiness checklist for UK manufacturers and hardware businesses placing products on the EU market — CE marking and conformity, EU representation, customs and origin, VAT and tax, and the legal and data obligations that come with it. Compiled by Dr Gareth Mills, fractional COO.

1. CE marking and product conformity

- ☐ Identify every EU directive and regulation that applies (EMC, RED, Low Voltage, Machinery, RoHS, REACH, GPSR, Ecodesign, Batteries Regulation).
- ☐ Confirm the conformity assessment route for each product — self-declaration or notified body — and hold the notified body certificate where required.
- ☐ Compile and maintain the technical file: design and test evidence, risk assessment, harmonised standards applied, and bill of materials.
- ☐ Issue a signed EU Declaration of Conformity per product, in the languages of the markets you place it on.
- ☐ Apply CE marking correctly on product, packaging and documentation, with notified body number where applicable.
- ☐ Hold RoHS and REACH substance declarations from every supplier, refreshed on a defined cycle.
- ☐ Meet GPSR traceability duties: manufacturer and importer details, batch or serial identification, and contact point on the product.
- ☐ Keep instructions, warnings and safety information translated for each member state where the product is sold.

2. EU market access and representation

- ☐ Appoint an EU Authorised Representative or Responsible Person where you have no EU establishment, named on the DoC and product information.
- ☐ Confirm who acts as importer of record and that importer labelling duties are met.
- ☐ Register for WEEE, packaging and batteries extended producer responsibility (EPR) in every member state you sell into.
- ☐ Check national deviations — EPR registration, language and labelling rules differ by member state.
- ☐ Confirm GB / EU divergence handling: UKCA for Great Britain, CE (and UKNI where relevant) for the EU and Northern Ireland.

3. Customs, origin and logistics

- ☐ Hold a GB EORI and an EU EORI, and register for any special procedures you use.
- ☐ Classify every product to the correct commodity code and validate it against binding tariff information.
- ☐ Evidence preferential origin under the UK–EU Trade and Cooperation Agreement, with supplier declarations on file for tariff preference.
- ☐ Confirm Incoterms in every customer and supplier contract, and that they match who actually clears the goods.
- ☐ Set up customs brokerage, duty deferment and, where useful, inward processing or customs warehousing.
- ☐ Prepare for CBAM reporting where in scope, and for the Digital Product Passport timelines in your category.

4. Tax and finance

- ☐ Determine VAT registration obligations per member state, including distance selling and the One Stop Shop where relevant.
- ☐ Confirm import VAT treatment, postponed accounting and reclaim routes.
- ☐ Check permanent establishment risk if you place staff, stock or agents in an EU member state.
- ☐ Align transfer pricing and intercompany agreements with any EU entity or distributor arrangement.
- ☐ Model landed cost — duty, VAT cash flow, EPR fees and compliance overhead — into product margin.

5. Legal, data and contracts

- ☐ GDPR: lawful basis, records of processing, DPAs with processors, and an EU representative under Article 27 if required.
- ☐ Confirm international data transfer mechanisms (adequacy or Standard Contractual Clauses) with a transfer risk assessment.
- ☐ Review distributor, agent and reseller agreements against EU competition and agency rules, including termination and compensation.
- ☐ Confirm product liability cover in EU markets and the recall / corrective action process under the new liability regime.
- ☐ Assess NIS2 and Cyber Resilience Act exposure for connected products and their software update obligations.
- ☐ Register trade marks and designs at EU level; confirm freedom to operate in your product category.

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