

Thinking of importing or selling new or reused cartridges in the EU?

Compliance should be at the top of your to-do list. EU and national rules are strict, and the consequences of getting it wrong can be severe. Depending on the regulation, non-compliance can mean heavy fines, product seizures, shipment delays, customer disputes and, for REACH breaches, even criminal penalties.

Use the checklist below to ensure every product you place on the market is fully compliant from day one. Protect your business, and yourself.

| REQUIREMENTS | WHAT TO DO & PENALTIES |
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| 1. EU PRESENCE & ACCOUNTABILITY | <p>What to do: Set up an EU legal entity or authorised representative and ensure they respond to compliance issues and official requests.</p> <p>Penalty: Sales bans, product seizure and heavy fines.</p> |
| 2. MANUFACTURER / IMPORTER IDENTIFICATION | <p>What to do: Print the manufacturer/importer name and address on each cartridge or, if too small, on the packaging.</p> <p>Penalty: Border detention, destruction of goods and fines.</p> |
| 3. REACH COMPLIANCE (Chemicals) | <p>What to do: Ensure all substances are REACH-compliant and obtain supplier declarations.</p> <p>Penalty: Severe fines, product seizure and possible imprisonment.</p> |
| 4. SAFETY DATA SHEET (SDS) | <p>What to do: Prepare an up-to-date SDS for each product type and include it in the packaging or provide a clear download link.</p> <p>Penalty: High fines and withdrawal orders; serious cases may lead to criminal charges.</p> |
| 5. EU DECLARATION OF CONFORMITY (DoC) | <p>What to do: Prepare a DoC listing all relevant directives and standards and ensure it is signed by an EU-based individual.</p> <p>Penalty: Sales bans, recalls, major fines and possible imprisonment.</p> |
| 6. WEEE & TAKE-BACK OBLIGATIONS | <p>What to do: Register with national WEEE systems in each country where you sell; provide take-back information; ensure proper recycling.</p> <p>Penalty: Fines, sales bans and enforced product withdrawal.</p> |
| 7. PACKAGING COMPLIANCE | <p>What to do: Ensure packaging meets EU and national rules on safety, labelling and recyclability.</p> <p>Penalty: Environmental fines and restrictions on market access.</p> |
| 8. CE MARK (Only if Permitted) | <p>What to do: Apply the CE mark only if all applicable directives are fully met; misuse is illegal.</p> <p>Penalty: Recalls, fines and possible criminal sanctions.</p> |
| 9. INTELLECTUAL PROPERTY (Patents) | <p>What to do: Only import remanufactured cartridges made from originals first sold in the EU/EEA.</p> <p>Penalty: Injunctions, seizure or destruction of infringing goods and large civil damages.</p> |
| 10. GPSR (General Product Safety Regulation 2024) | <p>What to do: Meet the new GPSR duties on safety, traceability and risk assessment for all consumer products, including those sold online.</p> <p>Penalty: Rapid withdrawal orders, sales bans, major fines and possible criminal liability.</p> |

Remember – You must comply with all these points