

Who Is the EU Responsible Person for Goods Made in India?



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Under the EU General Product Safety Regulation (2023/988), a consumer product can't be placed on the EU market unless an economic operator established in the EU is responsible for it. For goods made in India, that is the EU importer if there is one. If there isn't, it is an authorised representative with a written mandate from the manufacturer, or, where no other operator is in the EU, the fulfilment service provider that handles the goods. An Indian supplier can only take the role through an EU establishment.

The Short Version

- GPSR Article 16 requires an EU-established economic operator for every consumer product placed on the EU market.
- If you import Indian goods into the EU in your own name, you are the importer and the responsible person.
- Sellers outside the EU need an authorised representative, appointed in writing by the manufacturer.
- A fulfilment provider becomes the operator by default only when nobody else is in the EU, which is why many refuse the work.
- The operator's name, postal and electronic address go on the product, its packaging, the parcel or an accompanying document.

If you import the goods into the EU yourself, it's you. The EU's General Product Safety Regulation says a consumer product can't be placed on the EU market unless an economic operator established in the EU is responsible for it, and the law lists who that can be. The EU importer comes first after an EU-based manufacturer. Only when nobody in the EU imports the goods does the choice fall to an authorised representative or, by default, the fulfilment service provider.

The question usually comes from sellers who don't import in the EU at all. A UK or US brand selling Indian-made goods to EU consumers, or an Indian maker shipping straight to EU customers, finds that its warehouse won't help. A logistics voice in our forum logs explained why EU 3PLs "typically do not want to be the local responsible party if there is a product safety issue, recall, or regulator enquiry later" (our forum signal FS-SHP-051, 2026). This page reads the rule at source and sorts out who can take the role for Indian-made goods. CE-marked products have a parallel rule, covered on [CE and UKCA marking](#), so we focus on the textiles, homeware, handicrafts and furniture that make up most of what readers buy from India.

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- 01 **No EU operator, no EU sale.** "A product covered by this Regulation shall not be placed on the market unless there is an economic operator established in the Union who is responsible for the tasks set out in Article 4(3) of Regulation (EU) 2019/1020." (*[Regulation \(EU\) 2023/988, Article 16\(1\), read 18 October 2026](#)*)
- 02 **The list of who can be it.** An EU manufacturer, the importer, an authorised representative with a written mandate, or a fulfilment service provider "where no other economic operator ... is established in the Union". (*[Regulation \(EU\) 2019/1020, Article 4\(2\), read 18 October 2026](#)*)
- 03 **EU warehouses decline the role.** Logistics voices say 3PLs avoid being the responsible party because of recalls and regulator enquiries. (*[Our forum signal FS-SHP-051, 2024 to 2026](#)*)

1. What Does the Law Actually Require?

One named EU business per product. GPSR Article 16(1) borrows the tasks from the EU's market surveillance law, Regulation 2019/1020. The responsible operator has to keep the technical documentation available, give it to market surveillance authorities on a reasoned request, tell them when it believes a product presents a risk, and cooperate on corrective action such as a recall (Regulation 2019/1020, Article 4(3)).

GPSR adds two duties on top. The operator must regularly check that the product matches its technical documentation and carries the required identification and safety information, and give the authorities evidence of those checks when asked (Article 16(2)). And its name, postal and electronic address must appear "on the product or on its packaging, the parcel or an accompanying document" (Article 16(3)). The regulation has applied since 13 December 2024.

2. Who Can Be the Responsible Person?

Article 4(2) of Regulation 2019/1020 gives four options, in this order:

1. **A manufacturer established in the EU.** For Indian-made goods, only if the maker has its own EU company.
2. **The importer, where the manufacturer isn't in the EU.** GPSR defines the importer as the EU-established person "who places a product from a third country on the Union market" (Article 3). If you buy from India and import in your own name, this is you.
3. **An authorised representative** with a written mandate from the manufacturer to do the tasks.
4. **A fulfilment service provider established in the EU, for the products it handles,** but only "where no other economic operator as mentioned in points (a), (b) and (c) is established in the Union".

That fourth line explains the forum complaint. A fulfilment service provider is anyone offering at least two of warehousing, packaging, addressing and dispatching without owning the goods (GPSR Article 3). If a non-EU seller ships stock into an EU warehouse that also picks and posts it, and there's no importer or representative in the EU, the warehouse can end up as the responsible operator by default. That's exactly the exposure 3PLs want to avoid, so many refuse clients who arrive without one.

3. Can My Indian Supplier Be the Responsible Person?

Only through an EU establishment. An Indian company without an EU branch or subsidiary isn't "established in the Union", so it can't fill the role, however good its paperwork. What the Indian maker can do, and should, is make the role workable for whoever takes it.

GPSR puts its own duties on the manufacturer. It must keep technical documentation with a risk analysis and the standards applied (Article 9(2)), put a type, batch or serial number on the product (Article 9(5)), show its own name and postal and electronic address (Article 9(6)), and supply instructions and safety information in the language of the member state of sale (Article 9(7)). Before placing a product on the market, the importer must make sure the manufacturer has done points 9(2), 9(5) and 9(6) (Article 11(1)). So your Indian supplier is part of compliance whether or not it holds the EU role. Write those items into the purchase order.

4. What If I Sell Into the EU From Outside It?

Then someone in the EU must take the role, and you have two clean routes.

Use an EU importer. Sell to an EU distributor or retailer that imports in its own name. It becomes the importer and the responsible operator, and you're a supplier to it.

Appoint an authorised representative. The manufacturer gives an EU-established company a written mandate to perform the tasks. Our forum logs show buyers paying a recurring fee per product for named-address services, and one reply warned some offer "only a name and address" (FS-SHP-051). We don't publish the fees. Before you sign, ask what the representative will actually do when an authority writes, whether it will hold your technical file, and how it will handle a recall. A name on a label that won't answer the phone fails Article 16 when it matters.

Note who signs. The law speaks of a mandate "from the manufacturer". If you're a brand that has Indian goods made to your design and sold under your name, you may count as the manufacturer yourself, so take advice on which party should give the mandate.

5. What Goes on the Label?

For an Indian-made product sold in the EU, you're usually looking at three sets of details. The Indian manufacturer's name and addresses (Article 9(6)), the importer's name and addresses (Article 11(3)), and the responsible operator's details if that is someone else (Article 16(3)), plus a batch or type number. Where the importer is also the responsible operator, one set covers both. Online listings must show the manufacturer's details and, where the manufacturer isn't in the EU, the responsible person's, along with product identification and warnings (GPSR Article 19).

Agree the label artwork with your supplier before production. Adding stickers in an EU warehouse is possible, but an importer's label must not cover what the manufacturer's label says (Article 11(3)).

6. What Should I Settle Before the First Order?

- Who imports, and so who is the responsible operator.

- If you have no EU importer, who your authorised representative is and what its mandate covers.
- The technical file from your Indian supplier, including its risk analysis and any test reports.
- Batch or type numbering on each product.
- Label text, in the language of each member state where you'll sell.

The other EU rules that hold Indian goods, from REACH to EUDR, are on [India to the EU](#). If you'd rather someone assembled the supplier's technical file and checked labels before shipment, [SourcingSync](#) does that for buyers sourcing from India.

Questions Buyers Ask

Does GPSR apply to handicrafts and textiles? ^

It applies to consumer products in general, so yes for most homeware, textiles and furniture. Products with their own EU safety law, like toys, follow that law where it covers the same risk.

Can my EU warehouse be the responsible person? v

Does the Indian exporter need to do anything? v

I'm a UK company selling to EU consumers. Who is it? v

7. The Short Version

The warehouse that won't be your responsible person isn't being difficult. Under the law it's the last resort, and it knows it. Decide the role on purpose

- you as importer, an EU buyer, or a representative with a real mandate - and get the Indian supplier's file and labels ready to back it up.