



FAQ

EU GENERAL PRODUCT SAFETY REGULATION (GPSR)

SEPTEMBER 2025

Regulation (EU) 2023/988
on general product safety,
amending Regulation (EU)
No 1025/2012 and
Directive (EU) 2020/1828,
and repealing Directive
2001/95/EC and Directive
87/357/EEC



DISCLAIMER

This document reflects the view of EUROMOT and IMEC, with regards to the legal provisions of the Regulation (EU) 2023/988 on general product safety, amending Regulation (EU) No 1025/2012 and Directive (EU) 2020/1828, and repealing Directive 2001/95/EC and Directive 87/357/EEC

(EU General Product Safety Regulation (GPSR) Regulation) and it must not be considered or intended as a legally binding text for any reason whatsoever.

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Accordingly, in case of discrepancies between the content and interpretation of this FAQ and the text of the legislation 2023/988¹, the legislation must be applied.

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1 INTRODUCTION

The General Product Safety Regulation (GPSR), adopted on 10 May 2023, marks a significant update to the EU's consumer product safety framework. It replaces the General Product Safety Directive (2001/95/EC) and aims to modernize safety rules in response to evolving technologies, online marketplaces, and global supply chains. This regulation ensures that all consumer products placed on the EU market—whether sold online or offline, new or second hand—are safe for use. It introduces directly applicable rules across all Member States, eliminating inconsistencies in national transpositions. Key motivations for the GPSR include:

- Adapting to digital and online sales channels
- Strengthening market surveillance and enforcement
- Enhancing consumer protection and recall effectiveness
- Addressing cybersecurity and AI-related risks in products

The GPSR also introduces the “Safety Gate” (formerly RAPEX), a more robust EU-wide alert system for dangerous products, and places greater responsibility on economic operators (manufacturers, importers, and online platforms) to ensure product safety throughout the lifecycle.

ABOUT EUROMOT

EUROMOT, the European Association of Internal Combustion Engine and Alternative Powertrain Manufacturers, represents the key manufacturers of internal combustion engines and alternative powertrains installed in industrial non-road mobile machinery, marine and stationary applications that are operating in Europe and worldwide.

Founded in 1991, we provide an unparalleled heritage and hub of expertise for businesses, authorities, regulators, and public stakeholders worldwide. In partnership with major sector associations and institutions, it is our mission to drive smart regulation and sustainable innovation.

ABOUT INTERNATIONAL COUNCIL OF MARINE INDUSTRY ASSOCIATIONS (ICOMIA) AND THE ICOMIA MARINE ENGINE COMMITTEE (IMEC)

ICOMIA brings together a wide range of national marine industry associations into one global organisation and represents them at an international level, presenting a strong and united voice when dealing with issues challenging the industry. ICOMIA has been an active advocate for the international marine industry since 1966, working with authorities, regulatory bodies and related organisations to facilitate and encourage the growth of the worldwide recreational marine industry whilst keeping on top of policies and guidance to ensure the promotion, protection and growth of the industry. IMEC is a separate trade association formed in 1972 representing recreational marine engine and personal watercraft manufacturers worldwide.

2 QUESTIONS

2.1 Does the Recreational Craft Marine industry fall within the scope of the EU Regulation 2023/988 on General Product Safety (GPSR) and if so, are marine propulsion manufacturers required to comply with its accident reporting obligations?

Regulation (EU) 2023/988 on GPSR entered into force 12th June 2023 and applies from 13th December 2024. This regulation applies to consumer products, including equipment intended for recreational crafts. For products subject to specific safety requirements (by Union harmonised legislation), the GPSR applies to aspects and risks not covered by those specific safety requirements. The Recreational Craft Directive is listed in Reg (EU) 2019/1020, which focuses on market surveillance and compliance of products. Therefore, accident reporting to authorities by the manufacturer is an additional mandatory requirement that seems to apply to components and products installed on recreational craft.

Article 20 of the GPSR on Obligations of economic operators in the case of accidents related to safety of products is included in Chapter III Section 2, hence it applies also for recreational crafts. This is relevant to accidents involving personal injuries and/or death caused by the product. 'Distributors' are responsible to report accidents to the 'manufacturer'. Manufacturers need to report accidents involving injuries and death caused by our products through the Safety Business Gateway¹.

For components or vessel types not covered by the RCD, such as hydrofoiling vessels, which are explicitly excluded under Article 2.2 of the RCD, the full GPSR applies.

Under Article 27 of the GPSR, the Safety Business Gateway serves as the official portal for economic operators (e.g., manufacturers, importers) to provide required safety information to Market Surveillance Authorities (MSAs) in a streamlined and accessible manner. As clarified by the European Commission during the webinar held on 30 January 2025² and as per Recital 68, "if a business (...) is aware of an accident caused by one of its products, the business has to notify the responsible national authorities through the Safety Business Gateway and take action to prevent harm"³.

In accordance with Articles 25 and 26 of the GPSR, the Safety Gate Rapid Alert System is designated for use by Member State authorities to notify the European Commission of serious risk cases. These notifications must be submitted within four working days following the adoption of a corrective action. The Commission is then required to review the notification within the same four-day timeframe. Authorities must also inform the Commission of all other corrective measures, using the appropriate information tool of their choice.

For consumers, a separate Consumer Gateway is available to report safety concerns or incidents directly.

¹ European Commission. (n.d.). *Safety Business Gateway*. Retrieved June 19, 2025, from <https://webgate.ec.europa.eu/safety-business-gateway/screen/public/home>

² European Commission. (n.d.). *Obligations for businesses – Safety Gate*. Retrieved June 19, 2025, from <https://ec.europa.eu/safety-gate/#/screen/pages/obligationsForBusinesses>

³ European Commission. (n.d.). *Effective recalls – Safety Gate*. Retrieved June 19, 2025, from <https://ec.europa.eu/safety-gate/#/screen/pages/effectiveRecalls>

References: Recital 68, Art. 25 (Notification of a serious risk by the Member States), Art. 26 (Notification of other corrective measures by the Member States), Art.27 (Safety Business Gateway) of the GPSR and Article 2 (Definitions) of the RCD.

2.2 What constitutes an accident under the GPSR?

Under the scope of the General Product Safety Regulation (EU) 2023/988 (GPSR), an “accident” refers to incidents that result in death, serious adverse effects on a person’s health, or injury—whether permanent or temporary. This includes bodily harm, illness, and chronic health conditions linked to the use of a product. Damage to the craft alone, without any impact on human health or safety, does not qualify as an accident under the GPSR.

In cases where an individual falls overboard or disappears from a craft, the incident may suggest injury or fatality. However, if such an event is not attributable to a product safety issue, it is our understanding that the marine propulsion manufacturer is not responsible for reporting the incident⁴ under the GPSR framework.

Reference: U.S. Coast Guard

2.3 What does accidents ‘associated with the use of the product’ mean?

An accident is considered to be associated with the use of a product when it occurs on a recreational craft fitted with the product, and there is a reasonable possibility that the product caused or contributed to the incident. Importantly, it is not necessary to confirm that the product definitively caused or contributed to the accident before submitting a report. Such conclusions can only be drawn following a formal investigation. At the time of notification, the manufacturer is not expected to determine or declare the root cause of the accident. The obligation to report is triggered by the potential link between the product and the incident, not by confirmed causality.

2.4 What is an ‘injury’ with ‘serious adverse effects’?

In line with interpretations such as those used by the U.S. Coast Guard, an injury with serious adverse effects refers to any injury that requires medical treatment beyond basic first aid. This typically includes incidents that result in a person being hospitalised, undergoing surgical intervention, or receiving specialist medical care⁵. Such injuries go beyond minor cuts, bruises, or temporary discomfort and indicate a significant impact on a person’s health, whether short-term or long-term.

Reference: U.S. Coast Guard

⁴ U.S. Coast Guard. (n.d.). *Accident reporting*. Retrieved June 19, 2025, from <https://uscgboating.org/recreational-boaters/accident-reporting.php>

⁵ U.S. Coast Guard. (n.d.). *Accident reporting*. Retrieved June 19, 2025, from <https://uscgboating.org/recreational-boaters/accident-reporting.php>

2.5 Does the requirement for accident reporting apply only within the European Union?

The accident reporting obligations under Regulation (EU) 2023/988 (GPSR) apply only to incidents that occur within the territorial waters of the European Union. Accidents that take place outside EU jurisdiction are not subject to reporting requirements under this regulation. Furthermore, accident reporting is not applicable in cases where the vessel is being:

- Used outside its intended purpose, or
- Operated for illegal activities

Only accidents involving legitimate use of the product within the EU are within the scope of the GPSR reporting obligations.

2.6 When should the marine propulsion manufacturer report the accident?

Under Article 20 of Regulation (EU) 2023/988 (GPSR), a manufacturer must report an accident “without undue delay” from the moment they become aware of it. This means that once the manufacturer is informed, typically by an importer or distributor, they are expected to act promptly and proactively. In practical terms, this is generally understood to mean within the first working week after being notified of the incident. The regulation does not require confirmation of the product’s role in the accident before reporting. The obligation is triggered by the potential link between the product and the incident.

References: Article 20 (Obligations of providers of online marketplaces) of the GPSR

2.7 What should be the contents of the report?

When submitting a notification to the competent authorities under Regulation (EU) 2023/988 (GPSR), the manufacturer must include the following key information:

- Identification of the product, including type, model, and any relevant serial or batch numbers
- Description of the accident, including the circumstances under which it occurred, if known
- Any available evidence suggesting the product may have caused or contributed to the incident
- Details of corrective actions already taken or planned, if applicable

It is not necessary to confirm the cause of the accident at the time of reporting. The obligation is triggered by the potential link between the product and the incident. All reports must be submitted via the Safety Business Gateway⁶, the official EU portal for manufacturers and other economic operators to communicate with Market Surveillance Authorities.

⁶ European Commission. (n.d.). *Safety Business Gateway*. Retrieved June 19, 2025, from <https://webgate.ec.europa.eu/safety-business-gateway/>

See below screenshots of the European Commission Safety Business Gateway:

The screenshot shows the 'Notify a dangerous product to the authorities' form on the European Commission Safety Business Gateway. The form is titled 'FORM' and 'CASE LIST' on the left sidebar. The main content area is titled 'Notify a dangerous product to the authorities' and contains a list of eight steps: 1 | Countries concerned, 2 | Economic operator or provider of online marketplaces submitting the notification, 3 | Product involved, 4 | Description of the accident or of the safety issue, 5 | Risk assessment of the notifier, 6 | Corrective actions already taken or planned, 7 | Company(ies) in the supply chain which hold affected products, and 8 | Other.

The screenshot shows the '4 | Description of the accident or of the safety issue' form section. It includes a question 'Was an accident caused by the product?' with 'Yes' and 'No' radio buttons. Below this is a 'Description of the accident' section with an information icon and a note: 'If the accident concerns more than one person, please fill in the form for each person separately'. The form contains several input fields: 'What was the consequence of the accident?' (a dropdown menu), 'Describe the accident in detail, including any injury involved and how the product(s) was used. This information will help process your case' (a text area with a 2000 character limit), 'When did the accident happen?' (a date field with a calendar icon), 'Age of the affected person (in years)' (a text field with a hint 'Please insert a value between 0 and 130'), and 'Gender' (a dropdown menu). At the bottom, there is a button 'Add another injured person'.

2.8 Consumer products – accessories and online sale?

Any product sold directly to consumers, including through online platforms, falls under the scope of the General Product Safety Regulation (EU) 2023/988 (GPSR). This includes accessories and components such as fuel filters or fuel tanks that are intended for use in recreational craft.

If such a product:

- Has not undergone a proper risk assessment, and
- Can be installed incorrectly, leading to potential hazards (e.g. fuel leakage onto hot engine surfaces),

then the manufacturer has an obligation to:

- Conduct a thorough risk assessment,
- Provide clear installation instructions, and
- Inform consumers of any associated risks.

The GPSR introduces additional requirements for consumer products, particularly those sold online, to ensure that consumers are adequately informed and protected. This includes ensuring that installation guidance is clear and that potential misuse or incorrect installation does not result in serious safety risks.

Mandatory product information



New for harmonised products

PHYSICAL PRODUCT	PRODUCT OFFER in DISTANCE SALES
Type, batch or serial number or other element enabling product identification (e.g. barcode).	Information allowing the identification of the product , including a picture of it, its type and any other product identifier
Manufacturer: <ul style="list-style-type: none">- name, registered trade name or registered trade mark- postal and electronic address and, if different, the postal address or electronic address of the contact point through which consumers can contact manufacturer	Manufacturer: <ul style="list-style-type: none">- name, registered trade name or registered trade mark- postal and electronic address at which it can be contacted
Importer: <ul style="list-style-type: none">- name, registered trade name or trade mark- postal and electronic address and, if different, the postal address or electronic address of the contact point through which consumers can contact manufacturer	
Responsible person in the EU: <ul style="list-style-type: none">- name or registered trade mark- contact details, including the postal and electronic address	where the manufacturer is not established in the Union: Responsible person in the EU within the meaning of Article 16(1) of this Regulation or Article 4(1) of Regulation (EU) 2019/1020: <ul style="list-style-type: none">- name- postal and electronic address
clear instructions and safety information in a language which can be easily understood by consumers	any warning or safety information to be affixed to the product or to the packaging or included in an accompanying document in accordance with the GPSR or the applicable Union harmonisation legislation in a language which can be easily understood by consumers

Reference: European Commission. (n.d.). General Product Safety Regulation (GPSR) – Obligations for Businesses. Retrieved June 19, 2025, from https://webgate.ec.europa.eu/safety/consumers/consumers_safety_gate/obligationsForBusinesses/documents/GPSR-Presentation-website.pdf

3 BIBLIOGRAPHY

European Commission. (n.d.). Effective recalls – Safety Gate. Retrieved June 19, 2025, from <https://ec.europa.eu/safety-gate/#/screen/pages/effectiveRecalls>

European Commission. (n.d.). General Product Safety Regulation (GPSR) – Obligations for Businesses. Retrieved June 19, 2025, from https://webgate.ec.europa.eu/safety/consumers/consumers_safety_gate/obligationsForBusinesses/documents/GPSR-Presentation-website.pdf

European Commission. (n.d.). Obligations for businesses – Safety Gate. Retrieved June 19, 2025, from <https://ec.europa.eu/safety-gate/#/screen/pages/obligationsForBusinesses>

European Commission. (n.d.). Safety Business Gateway. Retrieved June 19, 2025, from <https://webgate.ec.europa.eu/safety-business-gateway/screen/public/home>

European Union. (2013) Directive 2013/53/EU of the European Parliament and of the Council of 20 November 2013 on recreational craft and personal watercraft and repealing Directive 94/25/EC. Official Journal of the European Union, L 354, 28 December, pp. 90–131. Available at: <https://eur-lex.europa.eu/eli/dir/2013/53/oj>

European Union. (2023) Regulation (EU) 2023/988 of the European Parliament and of the Council of 10 May 2023 on general product safety, amending Regulation (EU) No 1025/2012 and Directive (EU) 2020/1828, and repealing Directive 2001/95/EC and Directive 87/357/EEC. Official Journal of the European Union, L 135, 23 May, pp. 1–51. Available at: <https://eur-lex.europa.eu/eli/reg/2023/988/oj>
U.S. Coast Guard. (n.d.). Accident reporting. Retrieved June 19, 2025, from <https://uscgboating.org/recreational-boaters/accident-reporting.php>



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