

EU Product Compliance Gap Report — Q3 2026

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of scanned EU product listings had at least one compliance gap

Summary

Regonance scanned 40 consumer products listed for sale in the EU across multiple categories — apparel, electronics, cosmetics, toys, home goods, and accessories. Each product was assessed against the nine EU mandates the platform covers: GPSR, PPWR, EmpCo, DPP, EPR, CE marking, Right to Repair, REACH, and the EU Battery Regulation.

The results show a systematic compliance readiness gap across the EU ecommerce market.

Headline findings

92.5% of scanned products had at least one compliance gap.

Only 3 out of 40 products had all required compliance fields present and correctly structured.

The average product was missing 7.7 compliance fields.

Across all scans, products averaged 4.3 fields found and 7.7 fields missing — meaning the majority of required compliance data is absent from the typical EU product listing.

The average scan took 61.8 seconds. Compliance gaps are detectable almost instantly. The information isn't hidden — it's simply not there.

The top 10 compliance gaps

Rank	Missing field	% of products affected	Regulation
1	Manufacturer identity & EU postal address	62.5%	GPSR Article 9(2)
2	Country of origin	32.5%	Various / marketplace policy
3	Care instructions	25.0%	National laws / ISO 3758
4	Product identification (type, batch, serial)	20.0%	GPSR Article 9(5)
5	EU Responsible Person identity & postal address	20.0%	GPSR Article 16
6	Digital Product Passport data carrier	12.5%	ESPR framework
7	EU Responsible Person (name & contact)	10.0%	GPSR Article 16
8	CE marking (if applicable)	7.5%	Sector-specific directives
9	Certifications (sustainability, safety)	7.5%	Various
10	Materials composition	7.5%	Textile Labelling Reg / REACH

What these gaps mean

The manufacturer identity crisis

62.5% of products — nearly two-thirds — were missing the manufacturer's identity and EU postal address. Under GPSR Article 9(2), this information must appear on the product, its packaging, and its online listing. Amazon, bol.com, and other EU marketplaces are actively suppressing listings without this data.

This is the most fundamental compliance field, and it is absent from the majority of products.

Country of origin: present but not structured

32.5% of products lacked a clearly stated country of origin. While not universally mandated at EU level, country of origin is required for specific categories (food, cosmetics, agricultural products), expected by marketplaces, and will become mandatory for more categories under the ESPR Digital Product Passport framework.

Care instructions: the invisible gap

25% of products — predominantly textiles — had no care instructions. While not mandated by a single EU-wide regulation, care labelling is required by several Member States (notably France), expected by marketplaces, and will likely become mandatory under the forthcoming ESPR textile delegated act.

The EU Responsible Person gap

20% of products from non-EU manufacturers had no designated EU Responsible Person. Since GPSR became applicable on 13 December 2024, every non-EU manufacturer selling consumer products in the EU must designate an EU-based entity as the named contact for market-surveillance authorities. Products without an EU RP are subject to listing suppression and customs refusal.

Enforcement context

These findings arrive at a moment of accelerating enforcement:

- **4,671 Safety Gate alerts** were issued in 2025 — a 13% increase on 2024, with recalls, withdrawals, and marketplace delistings up 35%.
- **Amazon** is running automated GPSR compliance checks and suppressing non-compliant listings across all EU marketplaces.
- **bol.com** began removing non-compliant product listings in April 2026.
- **PPWR** became applicable on 12 August 2026, adding packaging compliance obligations.
- **EmpCo** becomes enforceable on 27 September 2026, making unsubstantiated green claims unlawful.

The gap between what regulators and marketplaces require and what product listings actually contain is large and closing fast — from the enforcement side.

The cost of these gaps

The economics of non-compliance are straightforward:

Risk	Estimated cost
Amazon listing suspension (7 days, €500/day product)	€3,500+ per incident
Customs refusal (one shipment)	€2,000–€20,000+
Market-surveillance fine (one infringement)	€1,000–€100,000+
Product recall	€50,000–€500,000+

For comparison, closing the most common compliance gaps — appointing an EU Responsible Person, updating product labelling, and structuring listing data — typically costs €2,000–€5,000/year for a small-to-medium brand.

Methodology

Products were scanned using the Regonance compliance platform, which checks product listings against nine EU mandates: GPSR, PPWR, EmpCo, DPP/ESPR, EPR, CE marking, Right to Repair, REACH/SVHC, and the EU Battery Regulation. Each scan extracts visible listing data and assesses it against the published requirements of each applicable regulation. Findings are evidence-traced — each gap is cited to the specific regulatory article that requires the missing information.

Sample size: 40 completed scans. Categories: apparel, electronics, cosmetics, toys, home goods, accessories. Markets: EU marketplaces and direct-to-consumer ecommerce.

This is a diagnostic sample, not a statistically representative survey. The findings indicate patterns, not population-level statistics. We will expand the sample and publish updated findings quarterly.

About Regonance

Regonance is an EU market access platform that scans product listings against nine EU compliance mandates in one workspace. The platform identifies which regulations apply, what compliance data is present, and what is missing — each finding traced to the regulatory article that requires it.

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