GPSR Documentation Pack — SAMPLE

Expandable 2-Tier Cabinet Organizer · Model HO-2T-60

28 October 2026 · Version 1.0

> **SAMPLE — for demonstration only.** The product, the manufacturer and all identifiers in this pack are fictional. Text in [square brackets] is a placeholder that is completed for each real client.

Product: Expandable 2-Tier Cabinet Organizer with Sliding Baskets · **Model:** HO-2T-60 · **Brand:** EXAMPLE HOME

Prepared by: CertiGraph, Estonia (EU), on behalf of the manufacturer, on the basis of information supplied by the manufacturer. The manufacturer approves this documentation as its own (section 9).

Contents of the pack

#	Document	Purpose
1	Technical documentation	Article 9(2) GPSR: description and safety-relevant characteristics of the product
2	Risk assessment	Internal risk analysis: hazards, injury scenarios, risk levels, measures
3	Safety information and warnings	Consumer information in EN, DE, FR, IT, ES
4	Label	Print-ready product and packaging label
5	Listing text	Information required in online offers under Article 19 GPSR
6	Gap report	Evidence still missing and the actions to close it
7	Authority response template	Ready-to-send reply to a market surveillance authority
8	Marketplace upload files	What is uploaded where on Amazon and Temu
9	Statement and approval	Record of preparation and the manufacturer's approval

1. Technical documentation

Document no. TF-HO-2T-60 · Version 1.0 · Drawn up under Article 9(2) of Regulation (EU) 2023/988 (GPSR) · Retained for 10 years after the last unit is placed on the market.

1.1 Economic operators

Role	Name	Postal address	Electronic address
Manufacturer	Example Home Products Co., Ltd.	[No. 1 Sample Road, Foshan, Guangdong, China]	[compliance@example.com]
EU responsible person (Article 16 GPSR)	[EU responsible person]	[Registered address, EU]	[email]
Importer	None — goods sold by the manufacturer via online marketplaces and stored in EU fulfilment centres	—	—

1.2 Product identification

- **Name:** Expandable 2-Tier Cabinet Organizer with Sliding Baskets
- **Brand:** EXAMPLE HOME · **Model:** HO-2T-60 · **Variants:** black, white (identical construction; one file covers both)
- **EAN:** [EAN-13 per variant]
- **Batch code:** format YYMM-LLL (year, month, production line), engraved on the rear rail and printed on the packaging label
- **Photos (annex A):** front, side, baskets extended, fixings bag, packaging, label in position

1.3 Description

Characteristic	Value
Dimensions	Width 30–50 cm (telescopic), depth 40 cm, height 38 cm
Weight	3.2 kg
Construction	Steel wire frame, two pull-out wire baskets on plastic runners, telescopic width adjustment
Rated load	8 kg per basket
Fixings supplied	8 screws, 4 adjustable feet, 1 hex key, in a separate bag
Expected service life	5 years in normal household use

Component	Material	Safety-relevant note
Frame and baskets	Carbon steel wire, epoxy powder coating	Coating composition to be confirmed (gap G2)

Component	Material	Safety-relevant note
Runners	POM (polyoxymethylene)	Determines the strength of the sliding mechanism
Feet and end caps	PP / ABS	End caps cover cut wire ends
Screws	Zinc-plated steel	Small parts
Packaging	Corrugated carton, PE bag for fixings	Bag warning required

1.4 Intended use and users

- **Intended use:** storage of household items, cleaning products and packaged food inside kitchen and bathroom cabinets, indoors.
- **Not intended for:** direct contact with unpackaged food; outdoor use; use as a step or shelf for persons.
- **Users:** adults. Children may be present in the household and may access the cabinet, so their foreseeable contact is considered in the risk assessment.
- **Reasonably foreseeable misuse:** overloading; standing or leaning on the product; fully extending both loaded baskets; use in a damp under-sink cabinet; leaving fixings within reach of young children during assembly.

1.5 Applicable legislation and references

Legislation	Status
Regulation (EU) 2023/988 (GPSR)	Applies — the only product safety act applicable to this product
Regulation (EC) No 1907/2006 (REACH), Annex XVII restrictions and Article 33 information duty	Applies to the coating and plastics — supplier declaration and test required (gap G2)
Toy, electrical, machinery and food contact legislation	Not applicable — not a toy, no electrical parts, no machinery function, not intended for direct food contact
National packaging / EPR rules	Apply to the packaging — handled outside this pack

Standards used as references for test methods (numbers and titles only; current editions to be confirmed):

- EN 14749:2016 — Domestic and kitchen storage units and worktops — Safety requirements and test methods (by analogy, for load and durability)
- EN 16122:2012 — Domestic and non-domestic storage furniture — Test methods for the determination of strength, durability and stability (by analogy)
- ISO/IEC Guide 50:2014 — Safety aspects — Guidelines for child safety in standards and other specifications
- ISO/IEC Guide 51:2014 — Safety aspects — Guidelines for their inclusion in standards

1.6 Evidence held

Evidence	Status
Load test of baskets and runners	Outstanding (gap G1)

Evidence	Status
Heavy metals in coating, REACH declaration	Outstanding (gap G2)
Edge and burr inspection record	Outstanding (gap G3)
Assembly instructions with safety information	Draft in section 3; full instructions to be completed (gap G5)

1.7 Post-market obligations

- Complaints and incidents are recorded in a register held by the manufacturer and shared with the EU responsible person.
- Accidents caused by the product are notified through the Safety Business Gateway (Article 20 GPSR).
- Safety Gate alerts on similar products are reviewed weekly; this file is updated if a new hazard appears.

2. Risk assessment

Method: the risk assessment methodology of the EU Safety Gate guidelines (Commission Implementing Decision (EU) 2019/417). For each hazard an injury scenario is described, the severity of the injury is graded 1 (minor) to 4 (fatal or permanent), and the probability of the scenario over the product's lifetime is estimated by multiplying the probabilities of its steps. Severity and probability together give the risk level: low, medium, high or serious. Probability figures are reasoned estimates, stated so that they can be checked and revised when test results arrive.

Result: before measures, two hazards reach **medium** risk (H2 pinching, H3 collapse under overload). With the measures below, every assessed hazard is **low**. Hazard H6 (chemical) cannot be assessed until test evidence is available; until gaps G1 and G2 are closed, this assessment does not yet confirm that the product is safe.

ID	Hazard	Injury scenario	Severity	Probability (lifetime)	Risk before measures	Measures	Residual risk
H1	Sharp wire end or burr	Unfinished wire end (1/100 units) × hand contact with force (1/10) × cut (1/2) → superficial cut	1	1/2 000	Low	Deburring, end caps on all cut ends, 100% outgoing visual and touch check (G3), warning to check for damage	Low
H2	Pinch point in runners and telescopic frame	Finger caught when closing a basket (1/10) × bruise beyond trivial (1/5)	1	1/50	**Medium**	End stops on runners, closing speed limited by runner friction, warning "keep fingers clear"	Low (1/500)
H3	Collapse of a basket or runner under overload	Overloading above 8 kg (1/5) × runner failure (1/100) × falling glass item causes a cut needing stitches (1/10)	2	1/5 000	**Medium**	Load test at 1.5 × rated load (G1), rated load marked on label, warning against overloading	Low (1/50 000)
H4	Small parts (screws, feet)	Child under 3 present during assembly (1/5) × access to loose part (1/100) × aspiration (1/100) × severe outcome (1/10)	4	1/5 000 000	Low	Fixings in a separate closed bag, choking warning in all languages	Low
H5	Plastic bag	Child present (1/5) × access to bag (1/100) × bag over head (1/1 000) × fatal outcome (1/10)	4	1/5 000 000	Low	Suffocation warning printed on the bag and in the safety information	Low
H6	Restricted substances in coating or plastics	Long-term exposure through handling	2	Not assessable without test	Not assessed	Supplier declaration and test for lead and cadmium in the coating, REACH declaration (G2)	Pending G2
H7	Misuse as a step	Person stands on unit (1/1 000) × fall (1/10) × fracture (1/2)	2	1/20 000	Low	Warning "do not stand or climb"	Low
H8	Corrosion in damp cabinet	Coating damage leads to rust and weakened runners → see H3	2	Covered by H3	Low	Powder coating, care instructions, periodic check for damage	Low

ID	Hazard	Injury scenario	Severity	Probability (lifetime)	Risk before measures	Measures	Residual risk
H9	Instability when both loaded baskets are fully extended	Unit shifts or basket drops (1/100) × minor bruise (1/2)	1	1/200	Low	Runner stops, warning not to extend both loaded baskets fully	Low

Review: this assessment is reviewed when test results arrive, when the design or supplier changes, after any complaint involving injury, and when Safety Gate publishes alerts on similar products.

3. Safety information and warnings

Each measure in the risk assessment that relies on user behaviour appears below. The same text goes into the assembly instructions, the safety image for the listing and, in short form, on the label.

English (EN)

- Read the instructions before assembly and keep them for future reference.
- Maximum load: 8 kg per basket. Do not overload. Distribute weight evenly.
- Do not stand, sit or climb on the product.
- When loaded, do not fully extend both baskets at the same time.
- Keep fingers clear of sliding parts when opening and closing.
- Regularly check that screws are tight and the product is undamaged; stop using it if damaged.
- **WARNING:** Small parts. Keep fixings and packaging away from children under 3 years — choking hazard.
- **WARNING:** Keep the plastic bag away from babies and children to avoid danger of suffocation.
- For indoor household use only. Not for direct contact with food.
- Clean with a damp cloth; do not use abrasive cleaners.

Deutsch (DE)

- Lesen Sie die Anleitung vor der Montage und bewahren Sie sie zum späteren Nachschlagen auf.
- Maximale Belastung: 8 kg pro Korb. Nicht überladen. Gewicht gleichmäßig verteilen.
- Nicht auf das Produkt stellen, setzen oder klettern.
- Im beladenen Zustand nicht beide Körbe gleichzeitig vollständig ausziehen.
- Beim Öffnen und Schließen Finger von beweglichen Teilen fernhalten.
- Regelmäßig prüfen, ob die Schrauben fest sitzen und das Produkt unbeschädigt ist; bei Beschädigung nicht mehr verwenden.
- **WARNUNG:** Kleinteile. Befestigungsteile und Verpackung von Kindern unter 3 Jahren fernhalten – Erstickungsgefahr.
- **WARNUNG:** Plastikbeutel von Babys und Kindern fernhalten – Erstickungsgefahr.
- Nur für den Gebrauch im Haushalt in Innenräumen. Nicht für den direkten Kontakt mit Lebensmitteln.
- Mit einem feuchten Tuch reinigen; keine scheuernden Reinigungsmittel verwenden.

Français (FR)

- Lisez les instructions avant le montage et conservez-les pour pouvoir vous y référer ultérieurement.
- Charge maximale : 8 kg par panier. Ne pas surcharger. Répartir le poids uniformément.
- Ne pas se tenir debout, s'asseoir ou grimper sur le produit.
- Lorsque le produit est chargé, ne pas sortir complètement les deux paniers en même temps.
- Tenir les doigts éloignés des pièces coulissantes lors de l'ouverture et de la fermeture.
- Vérifier régulièrement que les vis sont bien serrées et que le produit n'est pas endommagé ; cesser de l'utiliser en cas de dommage.
- **AVERTISSEMENT :** Petites pièces. Tenir la visserie et l'emballage hors de portée des enfants de moins de 3 ans – risque d'étouffement.

- **AVERTISSEMENT :** Tenir le sachet plastique hors de portée des bébés et des enfants afin d'éviter tout risque de suffocation.
- Usage domestique en intérieur uniquement. Ne convient pas au contact direct avec les aliments.
- Nettoyer avec un chiffon humide ; ne pas utiliser de produits abrasifs.

Italiano (IT)

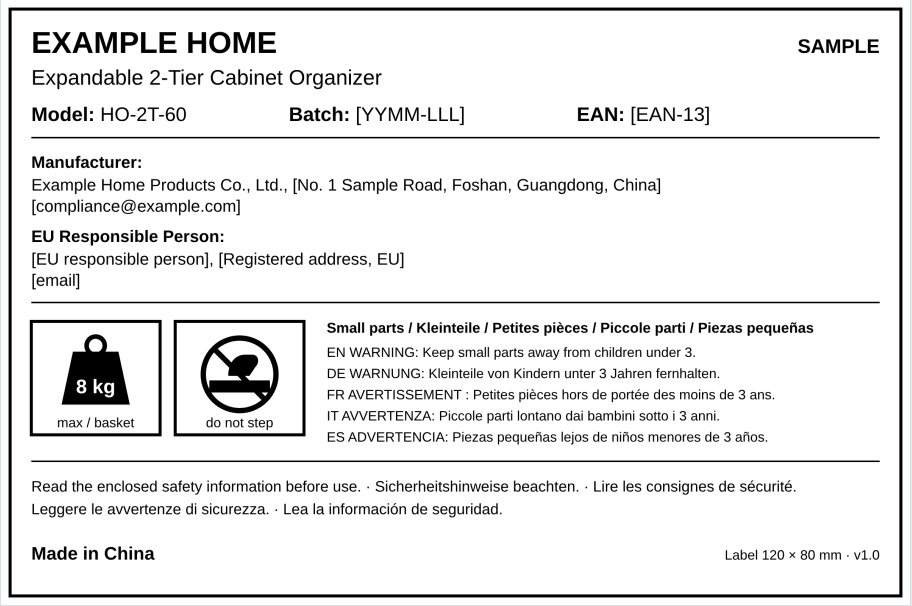
- Leggere le istruzioni prima del montaggio e conservarle per consultazioni future.
- Carico massimo: 8 kg per cestello. Non sovraccaricare. Distribuire il peso in modo uniforme.
- Non salire, sedersi o arrampicarsi sul prodotto.
- Quando il prodotto è carico, non estrarre completamente entrambi i cestelli contemporaneamente.
- Tenere le dita lontane dalle parti scorrevoli durante l'apertura e la chiusura.
- Controllare regolarmente che le viti siano serrate e che il prodotto non sia danneggiato; non utilizzarlo se danneggiato.
- **AVVERTENZA:** Piccole parti. Tenere la minuteria e l'imballaggio lontano dai bambini di età inferiore a 3 anni – pericolo di soffocamento.
- **AVVERTENZA:** Tenere il sacchetto di plastica lontano da neonati e bambini per evitare il pericolo di soffocamento.
- Solo per uso domestico in ambienti interni. Non adatto al contatto diretto con gli alimenti.
- Pulire con un panno umido; non utilizzare detergenti abrasivi.

Español (ES)

- Lea las instrucciones antes del montaje y consérvelas para futuras consultas.
- Carga máxima: 8 kg por cesta. No sobrecargar. Distribuya el peso de manera uniforme.
- No se suba, siente ni trepe sobre el producto.
- Cuando el producto esté cargado, no extienda completamente ambas cestas al mismo tiempo.
- Mantenga los dedos alejados de las piezas deslizantes al abrir y cerrar.
- Compruebe periódicamente que los tornillos estén apretados y que el producto no esté dañado; deje de usarlo si está dañado.
- **ADVERTENCIA:** Piezas pequeñas. Mantenga la tornillería y el embalaje fuera del alcance de los niños menores de 3 años – peligro de asfixia.
- **ADVERTENCIA:** Mantenga la bolsa de plástico fuera del alcance de bebés y niños para evitar el peligro de asfixia.
- Solo para uso doméstico en interiores. No apto para el contacto directo con alimentos.
- Limpie con un paño húmedo; no utilice productos abrasivos.

4. Product and packaging label

The print-ready label (120 × 80 mm, black on white) is delivered as SVG for the printer and as PDF and PNG for review. It goes on the outer carton; the model and batch code are also engraved on the rear rail of the product.



Element on the label	Requirement it meets
Brand, product name, model, batch code, EAN	Product identification (Article 9(5) GPSR)
Manufacturer name, postal and electronic address	Manufacturer information (Article 9(6) GPSR)
EU responsible person name, postal and electronic address	Responsible person information (Article 16(2) GPSR)
Pictogram: 8 kg max per basket	Measure for hazard H3
Pictogram: do not step	Measure for hazard H7
Small parts warning in EN, DE, FR, IT, ES	Measure for hazard H4
"Read the enclosed safety information" in five languages	Points to section 3

Fixings bag: the bag carries a separate printed warning (measures for H4 and H5): "WARNING: Small parts. Keep away from children under 3 years. Keep this bag away from babies and children to avoid danger of suffocation." — with the same text in DE, FR, IT, ES as in section 3.

Languages: the label covers the five largest markets. For every other country where the product is sold, a sticker or an insert with the safety information in that country's language is added.

5. Listing text (Article 19 GPSR)

Article 19 requires every online offer to show, before purchase: the manufacturer, the EU responsible person, information identifying the product (including a picture and type), and warnings and safety information in the language of the country. A link to an external page alone is not enough. The blocks below are copied into the product description or the marketplace's safety fields.

English (EN)

Product safety information
Manufacturer: Example Home Products Co., Ltd., [No. 1 Sample Road, Foshan, Guangdong, China], [compliance@example.com]
EU Responsible Person: [EU responsible person], [Registered address, EU], [email]
Product: EXAMPLE HOME Expandable 2-Tier Cabinet Organizer, model HO-2T-60
Safety: Max. 8 kg per basket. Do not stand or climb on the product. Keep fingers clear of sliding parts. WARNING: Small parts – keep away from children under 3. Keep the plastic bag away from children – danger of suffocation. Indoor household use only.

Deutsch (DE)

Produktsicherheitsinformationen
Hersteller: Example Home Products Co., Ltd., [No. 1 Sample Road, Foshan, Guangdong, China], [compliance@example.com]
Verantwortliche Person in der EU: [EU responsible person], [Registered address, EU], [email]
Produkt: EXAMPLE HOME Ausziehbarer Schrank-Organizer mit 2 Ebenen, Modell HO-2T-60
Sicherheit: Max. 8 kg pro Korb. Nicht auf das Produkt stellen oder klettern. Finger von beweglichen Teilen fernhalten. WARNUNG: Kleinteile – von Kindern unter 3 Jahren fernhalten. Plastikbeutel von Kindern fernhalten – Erstickungsgefahr. Nur für den Gebrauch im Haushalt in Innenräumen.

Français (FR)

Informations sur la sécurité du produit
Fabricant : Example Home Products Co., Ltd., [No. 1 Sample Road, Foshan, Guangdong, China], [compliance@example.com]
Personne responsable dans l'UE : [EU responsible person], [Registered address, EU], [email]
Produit : EXAMPLE HOME Organiseur de placard extensible à 2 niveaux, modèle HO-2T-60
Sécurité : 8 kg max. par panier. Ne pas monter ni grimper sur le produit. Tenir les doigts éloignés des pièces coulissantes. AVERTISSEMENT : Petites pièces – hors de portée des enfants de moins de 3 ans. Tenir le sachet plastique hors de portée des enfants – risque de suffocation. Usage domestique en intérieur uniquement.

Italiano (IT)

Informazioni sulla sicurezza del prodotto
Fabbricante: Example Home Products Co., Ltd., [No. 1 Sample Road, Foshan, Guangdong, China], [compliance@example.com]
Persona responsabile nell'UE: [EU responsible person], [Registered address, EU], [email]
Prodotto: EXAMPLE HOME Organizer per mobili estensibile a 2 ripiani, modello HO-2T-60
Sicurezza: Max. 8 kg per cestello. Non salire né arrampicarsi sul prodotto. Tenere le dita lontane dalle parti scorrevoli. AVVERTENZA: Piccole parti – tenere lontano dai bambini sotto i 3 anni. Tenere il sacchetto di plastica lontano dai bambini – pericolo di soffocamento. Solo per uso domestico in interni.

Español (ES)

Información de seguridad del producto
Fabricante: Example Home Products Co., Ltd., [No. 1 Sample Road, Foshan, Guangdong, China], [compliance@example.com]
Persona responsable en la UE: [EU responsible person], [Registered address, EU], [email]
Producto: EXAMPLE HOME Organizador de armario extensible de 2 niveles, modelo HO-2T-60
Seguridad: Máx. 8 kg por cesta. No se suba ni trepe sobre el producto. Mantenga los dedos alejados de las piezas deslizantes. ADVERTENCIA: Piezas pequeñas – mantener fuera del alcance de niños menores de 3 años. Mantenga la bolsa de plástico fuera del alcance de los niños – peligro de asfixia. Solo para uso doméstico en interiores.

6. Gap report

Five items are open. G1 and G2 must be closed before the risk assessment can conclude that the product is safe; G3–G5 are quick fixes on the manufacturer's side. Cost and time are indicative and confirmed by the laboratory's quote.

ID	Gap	Why it matters	Action	Owner	Indicative cost / time
G1	No load test for baskets and runners	Rated load of 8 kg is a claim without evidence (H3)	Static load test at 1.5 × rated load (12 kg per basket) and an open/close cycle test, by analogy with the storage furniture test methods in section 1.5	Manufacturer, via a laboratory	[Lab quote] · 1–2 weeks
G2	No evidence on restricted substances	Coating and plastics may contain lead, cadmium or other restricted substances (H6)	Supplier declaration on REACH Annex XVII and the Candidate List; XRF screening or lab test of the coating for heavy metals	Manufacturer and coating supplier	[Lab quote] · 1–2 weeks
G3	No record of edge inspection	Measure for H1 depends on 100% inspection	Add edge and end-cap check to the outgoing quality checklist; keep records per batch	Manufacturer	No cost · immediate
G4	Batch code format not yet applied	Traceability required by Article 9(5) GPSR	Engrave or label batch code (YYMM-LLL) on the rear rail and print it on the carton	Manufacturer	Low · next production run
G5	No full assembly instructions	Safety information must accompany the product	Insert the text of section 3 into the assembly leaflet in all sales languages	Manufacturer, text supplied in this pack	No cost · next print run

Status after closing G1–G5: the risk assessment is updated with the test results, and the product can be documented as low risk for all assessed hazards.

7. Authority request response template

Used when a market surveillance authority asks for documentation. Reply within the deadline the authority sets; if none is set, aim for 48 hours. Attach sections 1, 2, 3 and 6, the label and any test reports.

```
Subject: Your request [reference no.] — EXAMPLE HOME cabinet organizer, model HO-2T-60

Dear Sir or Madam,

Thank you for your request of [date], reference [no.], concerning the product EXAMPLE HOME
Expandable 2-Tier Cabinet Organizer, model HO-2T-60, batch [batch code].

[EU responsible person] acts as the EU responsible person for this product under Article 16 of
Regulation (EU) 2023/988, on the basis of a written mandate from the manufacturer, Example Home
Products Co., Ltd., [address], [email].

Please find attached:
1. Technical documentation TF-HO-2T-60, version [x], dated [date]
2. Risk assessment, version [x]
3. Safety information and warnings as supplied with the product
4. Label and packaging images
5. Test reports: [list, or "not yet available — see gap report, expected by (date)"]
6. Gap report and corrective action status
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The product is sold in [countries] via [marketplaces]. Estimated units placed on the EU market:
[number]. Complaints or incidents recorded: [none / details].

We remain at your disposal for any further information and will cooperate fully on any measure
you consider necessary.

Yours faithfully,
[Name], [Position]
[EU responsible person], [Registered address]
[email] · [phone]
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Internal rule: the manufacturer is informed the same day, and nothing is admitted or promised in the reply beyond facts and cooperation.

8. Marketplace upload files

Each file is named so that it can be uploaded without renaming. Marketplace menus change; the client checks the current path in its seller account before uploading.

File	Content	Amazon	Temu
HO-2T-60_RP_manufacturer.txt	Manufacturer and EU responsible person details	Account Health → Regulatory compliance → GPSR, at brand or ASIN level	Compliance Center (合规中心) → responsible person declaration
HO-2T-60_safety_[DE/FR/IT/ES/EN].pdf	Section 3 in one language per file	Product documents, one per marketplace language	Product safety documents
HO-2T-60_safety_[lang].jpg	Section 3 as an image, 2000 px wide	Warning and safety images (Image Manager)	Product images, safety slot
HO-2T-60_listing_[lang].txt	Section 5 text	Product description	Product description
HO-2T-60_label.pdf / .svg	Label, section 4	Kept on file; not uploaded unless requested	Label image upload where requested
HO-2T-60_bulk_upload.xlsx	Bulk template rows for document upload	Filled in after the client generates the template for this product type and store in Seller Central	—

Before upload: the client confirms that the RP details in its account match the label exactly, character for character. A mismatch between listing, label and documents is one of the most common triggers for an audit.

9. Statement of documentation preparation and manufacturer approval

Statement by the preparer

CertiGraph has prepared sections 1–8 of this pack for the product EXAMPLE HOME HO-2T-60 on [date], on the basis of the information, photographs and documents supplied by the manufacturer. The preparer has not tested the product. This statement is not a certificate of conformity and does not certify that the product is safe; the outstanding evidence is listed in the gap report (section 6).

Signed: ..... · Name: [name] · Date: [date]

Approval by the manufacturer

The manufacturer, Example Home Products Co., Ltd., confirms that:

- the information supplied for this documentation is true and complete;
- it has reviewed sections 1–8 and adopts them as its own technical documentation and internal risk analysis under Article 9(2) of Regulation (EU) 2023/988;
- it will close the gaps in section 6 by [date] and inform the EU responsible person of the results;
- it will inform the EU responsible person without delay of any change to the product, its materials or its supplier, and of any complaint or incident.

Signed: ..... · Name and position: [name] · Company seal: [seal] · Date: [date]

Version history

Version	Date	Change
1.0	28 Oct 2026	First issue (sample)