

## Product Safety in E-Commerce: What steps should the EU take to protect consumers from unsafe imports while supporting innovation and fair competition in the digital marketplace?

As the European Parliament considers amendments to the draft report on Product safety and regulatory compliance in e-commerce and non-EU imports, ensuring a pragmatic, enforceable, and future-oriented framework for customs and market surveillance is more urgent than ever.

### Key Considerations for Reform:

We welcome the Parliament's efforts to strengthen enforcement and protect EU consumers. However, to ensure the effectiveness and sustainability of the reform, we believe several critical elements must be considered:

#### 1. Prioritise Product Safety – Protecting EU Consumers from Harmful Goods

The current system exposes EU consumers to potentially unsafe, non-compliant products that are difficult to trace or recall. Moving compliance checks upstream would:

- Prevent unsafe and substandard goods from entering the EU market.
- Support product recall effectiveness and traceability.
- Help MSAs act based on accurate, early-stage data linked to certified economic operators.

#### 2. Shift Compliance Upstream – Before Products Enter the EU

Compliance with product rules must occur before goods are offered or dispatched to EU customers. This proactive approach would:

- Reduce the burden on customs and MSAs.
- Limit unnecessary waste from rejected goods.
- Contribute to the EU's sustainability objectives.

#### 3. Enable Smart Risk-Based Supervision and Early Intervention

Goods are often automatically released by customs due to time constraints or limited data, which leads products enter the EU without being properly checked.

Implementing a 24-hour post-arrival supervision window for automatically released goods would:

- Allow targeted, risk-based inspections using AI and digital tools.
- Improve tracking and traceability of small parcel imports.
- Be limited to non-trusted traders, with exemptions for certified actors (e.g., AEOs).

#### 4. Preventing the Entry of Products Containing Hazardous Chemicals

The presence of restricted or hazardous substances in non-EU products sold online poses a growing threat to consumer safety in the EU. Introducing pre-market compliance checks for chemical safety would:

- Ensure that goods entering the EU comply with REACH, CLP, and other chemical safety regulations.
- Reduce consumer exposure to carcinogens, endocrine disruptors, and other harmful substances commonly found in low-cost imports.
- Enable authorities to identify and stop high-risk shipments based on chemical risk profiles before they reach EU consumers.

