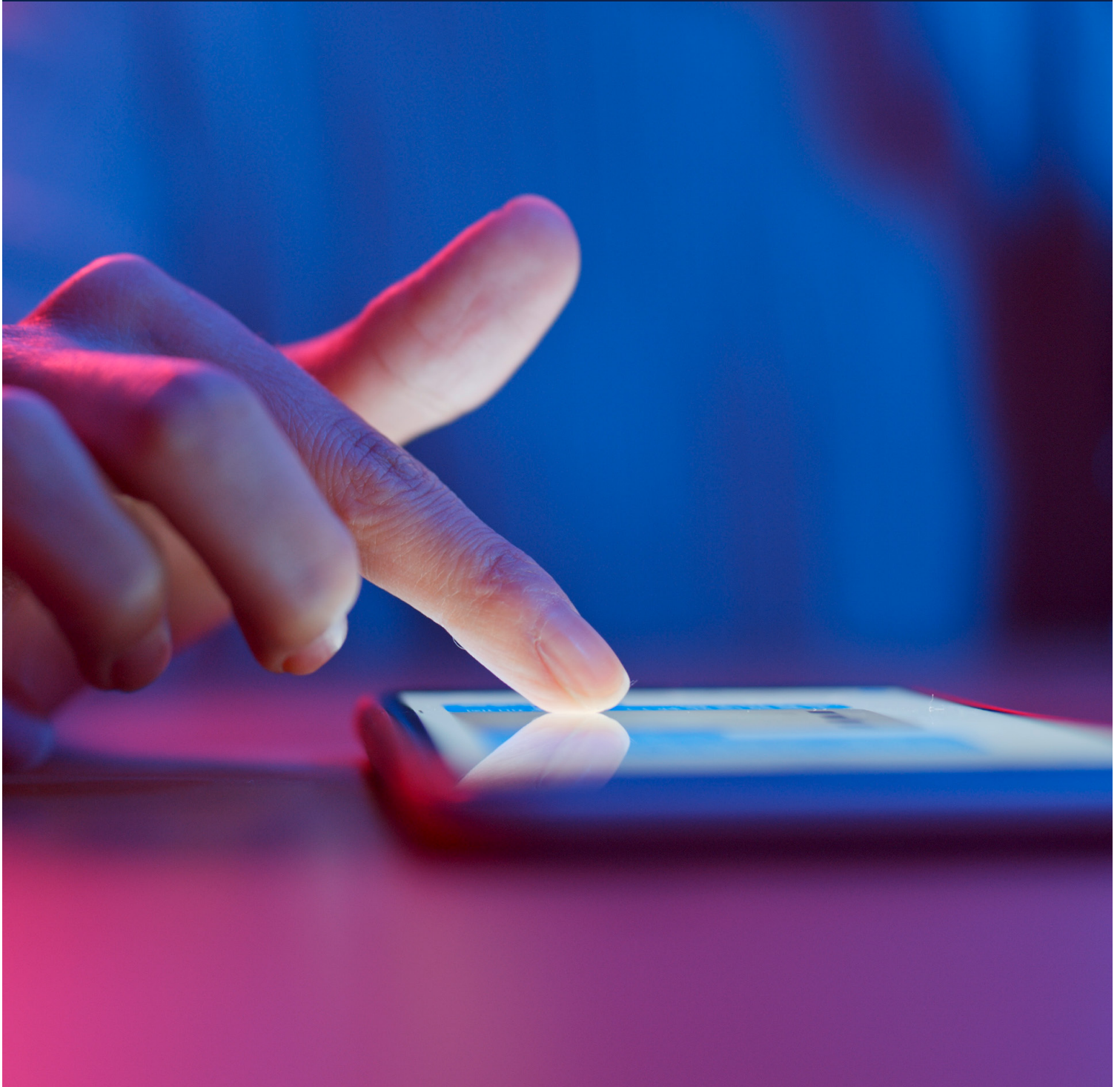


Second Life, First Class Compliance: EU Market Access for Refurbished Consumer Electronics under GPSR, WEEE & Waste Law



Who is concerned?

Global brands, refurbishers, and resellers of consumer electronic devices – smartphones, laptops, tab-lets, wearables, household appliances, etc. – face major regulatory demands when selling refurbished goods in the EU.

Whether you operate e-commerce, recommerce, take-back schemes, or third-party repair networks: the new EU General Product Safety Regulation (GPSR), WEEE Directive, and waste laws directly affect your business model.

What's new – and what's at stake:

Since 13 December 2024, the GPSR has brought refurbished products fully under the umbrella of EU safety and traceability obligations. In addition, WEEE (Directive 2012/19/EU) and the Waste Framework Directive (2008/98/EC) pose complex compliance challenges across the product–waste interface.

Key compliance issues for refurbished electronics:

- Product or waste? Ensure legal status as a “product” throughout transport, storage, and resale – or risk classification as “waste”
- GPSR obligations: Safety assessments, technical documentation, user info, CE marking (if applicable), and traceability

- EU Responsible Person: Required for all non-EU entities placing refurbished electronics on the EU market
- WEEE compliance: Registration, take-back systems, financing obligations, and labeling must also cover refurbished and reintroduced products
- Consumer transparency: Mandatory disclosures that the product is refurbished, with details on the nature and scope of refurbishment
- Cross-border movement: Risk of waste shipment classification under EU Waste Shipment Regulation if documentation is lacking
- Marketing claims: Refurbished product messaging must comply with upcoming Green Claims Directive rules

What's the risk of non-compliance?

- Sales bans, border seizures, or product recalls
- Heavy fines and joint liability for EU distributors and platforms
- Waste law violations leading to criminal or administrative enforcement
- Platform delisting (Amazon, eBay, etc.) and disrupted B2B relationships
- Damage to brand reputation in sensitive sustainability and compliance markets

How we help – legal solutions for refurbished consumer electronics:

As a top-tier international law firm with a unique focus on product compliance, circular economy, and electronics regulation, we support clients globally with:

- “Non-Waste” Status Strategy and legal documentation for refurbished goods
- GPSR & CE Compliance Advisory for refurbished consumer electronics
- WEEE Compliance Solutions: Registration, take-back structures, labeling
- EU Responsible Person Structuring and import chain design
- Cross-border logistics risk mitigation under waste shipment rules
- Refurbishment chain contract design and liability allocation
- Green Marketing & Sustainability Claims Review
- Online Marketplace & Platform Compliance Toolkit

Refurbished. Responsible. Ready for the EU.

Contact us to accompany your compliance journey. Your tech law firm with electronic product law experts, combining commercial, IP and product compliance expertise!



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