salling group

Nonfood Vendor Manual

September 2025
Version 4.1

Contents

Introduction

This manual provides essential information on product safety, chemical requirements, and other relevant guidelines to support our vendors in maintaining a high standard for product safety.

It outlines the most common safety and chemical requirements for our nonfood and nearfood product range. However, the regulations and requirements referenced are not exhaustive. Vendors should not rely on this manual as a comprehensive guide, as additional requirements may apply.

We encourage all vendors to regularly review this manual and comply with the outlined requirements and applicable standards. Please pay special attention to the section titled “General Requirements”. The remaining sections address specific legislation and requirements, which vendors must review and adhere to as applicable.

Vendors must stay informed about Danish and European legislation at all times. Products and packaging must comply with all relevant laws, directives, regulations, and the requirements and specifications agreed upon with Salling Group in the Trade Agreement. This manual refers to original regulations, and vendors must ensure compliance with all applicable regulations, including any subsequent amendments.

DK!

When the “DK!”* pictogram is displayed, it highlights special Salling Group requirements, Danish-specific conditions, or areas of increased attention in Denmark.

If you have any questions or need further clarification, please contact the relevant buying department or quality department at Salling Group.

Thank you for your cooperation.

salling group

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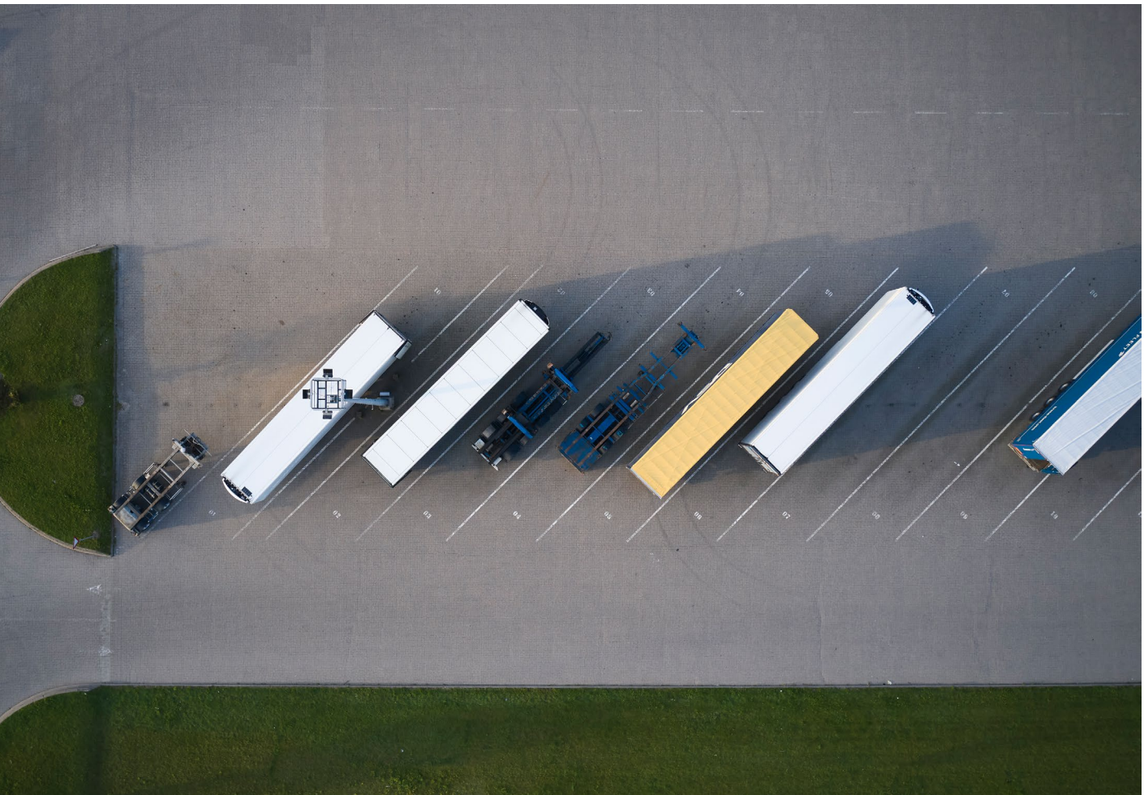
General Requirements

When entering into a trade agreement with Salling Group, vendors guarantee that all supplied products comply with applicable national and EU laws, regulatory requirements, standards, and other legal obligations. This ensures that products meet the highest safety and quality standards, safeguarding both consumers and the supply chain.

European consumer protection measures are designed to safeguard consumers' health, safety, and economic and legal interests. These measures significantly influence the requirements for placing consumer products on the market.

To ensure compliance, products must undergo a thorough risk analysis during the design phase. This process often includes testing to demonstrate that the products are safe for consumers and meet the general safety requirements set by legislation. The legislation provides the framework for conducting risk analyses, as well as the tests and documentation that must accompany the product.



Documentation Requirements

As a vendor to Salling Group, you are required to meet or exceed the legal requirements outlined in Salling Group's Trade Agreement or other agreements. A key obligation is ensuring product safety and maintaining the necessary documentation. Once an order has been placed, vendors must submit the applicable documentation to Salling Group.

Examples of required documentation include (see Table 1):

Declaration of Conformity	A formal statement by the manufacturer confirming that the product complies with relevant EU directives or regulations and standards.
Technical documentation	Comprehensive records detailing the design, manufacturing process, and operation of the product to demonstrate compliance.
Risk analysis	An evaluation identifying potential hazards associated with the product and measures taken to mitigate them.
Test reports	Official reports from testing procedures verifying that the product meets safety and performance standards.
Data sheets	Detailed specifications and technical information about the product's components and materials.
Art work	Visual representations, such as labels or packaging designs, ensuring compliance with EU labeling requirements.
Certificates	Official documents proving compliance with specific standards, such as CE marking, Oeko-Tex certifications, or other relevant certifications for safety or quality.

Table 1: Examples of required documentation.

We encourage vendors to prepare their declarations in compliance with legal requirements in the manner they find most suitable. For inspiration, standard templates are available for:

- **Risk analysis (see Appendix IV)**
- **Declaration of Conformity for CE-marked products (see Appendix I)**
- **Declaration of Compliance for food contact materials (see Appendix II)**

If a specific standard applies to a product, Salling Group expects the product to fully comply with the requirements of that standard.
All required documentation must be submitted to the relevant buying department unless otherwise agreed. This ensures that Salling Group can verify compliance and maintain the highest standards of product safety and quality.

Traceability

Traceability is a critical component of product safety and compliance. It enables the identification of unsafe or non-compliant products within the distribution chain and clarifies the roles and responsibilities of economic operators throughout the supply chain. Effective traceability ensures a clear link between products and their documentation, allowing for swift corrective actions, such as product withdrawal or recall, if necessary.

Traceability is essential as it ensures a clear link between documentation and products, while also enabling effective corrective actions, including withdrawal or recall, if an unsafe product is placed on the market.

Vendors must adhere to the following traceability requirements, as applicable (see Table 2):

Retention of Documentation	Retain the technical documentation and the EU Declaration of Conformity for ten years after the product has been placed on the market, or for the period specified in the relevant EU harmonization legislation.
Product Identification	Ensure that the product is marked with a type, batch, or serial number, or another form of identification that allows it to be traced.
Supply Chain Information	The manufacturer's name, registered trade name or trademark, and contact details. If the manufacturer is located outside the EU, the importer's name, registered trade name or trademark, and contact details must also be provided.
Link Between Documentation	Official documents proving compliance with specific standards, such as CE marking, Oeko-Tex certifications, or other relevant certifications for safety or quality.

Table 2: Examples of traceability requirements.

Labelling

Proper labelling and user instructions are essential to ensure compliance with EU legislation and to provide consumers with the necessary information for safe product use. The EU's "Blue Guide" outlines general labelling requirements, but additional or specific requirements may apply depending on the product type (e.g., medical equipment, electronics, toys, cosmetics, textiles ect.). Vendors are advised to verify the specific legislative labelling requirements for each product.

By adhering to these requirements (see below), vendors ensure that products are safe, compliant, and provide consumers with the necessary information for proper use.

Actors in the Product Supply Chain

To ensure compliance with EU legislation and maintain product safety, all parties in the supply chain—manufacturers, importers, and distributors—must fulfill specific responsibilities. These roles are critical in ensuring that products meet regulatory requirements and provide consumers with safe and reliable products.

By fulfilling these responsibilities, manufacturers, importers, and distributors collectively ensure that products on the market comply with EU legislation and are safe for consumers. This collaborative effort is essential for maintaining trust and upholding regulatory standards.

Responsibilities of the manufacturer

Manufacturers bear the primary responsibility for ensuring that products comply with applicable regulations and are safe for consumers. Their key obligations include (see Table 3):

Technical Documentation	Create and maintain technical documentation that supports the product's compliance with applicable regulations
Declaration of Conformity	Prepare and retain an EU Declaration of Conformity to confirm that the product meets relevant requirements (e.g., for food contact materials or CE-marked products).
Labelling	Ensure the product is correctly labelled as required by applicable legislation.
Identification	Label the product with the manufacturer's name, registered trade name or trademark, and contact details.
Instructions and Safety Information	Provide warnings on the labeling, user manuals, and safety information in the language(s) required in the country where the product is marketed.

Table 3: Examples of traceability requirements.

Responsibilities of the importer

Importers play a vital role in ensuring that products manufactured outside the EU comply with EU regulations. Their key obligations include (see Table 4):

Compliance Check	Verify that the manufacturer has conducted the necessary conformity assessment and that the product is correctly CE marked and/or labeled with the EU energy label, if required.
Identification	Add the importer's name, registered trade name or trademark, and contact details to the product or its packaging.
Safety	Ensure that the product does not pose a risk and that warnings on the labeling are accurate and complete.
Documentation	Ensure that a copy of the EU Declaration of Conformity and technical documentation is available and can be provided upon request.

Table 4: Examples of traceability requirements.

Responsibilities of the distributor

Distributors ensure that products are properly labeled and meet safety requirements before they reach consumers. Their key obligations include (see Table 5):

Labeling Check	Verify that the product is properly labeled and accompanied by the required product documentation
Safety	Ensure that the product does not pose a risk and that warnings and instructions are accurate and complete.
Cooperation with Authorities	Provide access to documentation and cooperate with authorities during investigations, if requested

Table 5: Example of key obligations of the distributor.

General Product Safety Regulation

The General Product Safety Regulation (EU) 2023/988 (GPSR), effective from 13 December 2024, replaces the Directive 2001/95/EC on general product safety. The GPSR regulation modernises the EU's general product safety framework, ensuring that all consumer products on the EU market are safe. It establishes specific obligations for businesses to ensure product safety, by clarifying the responsibilities of manufacturers, importers, and distributors.

Key Provisions of the GPSR

Designated responsible economic operators must ensure that technical documentation and safety information are readily available to authorities (see Table 6):

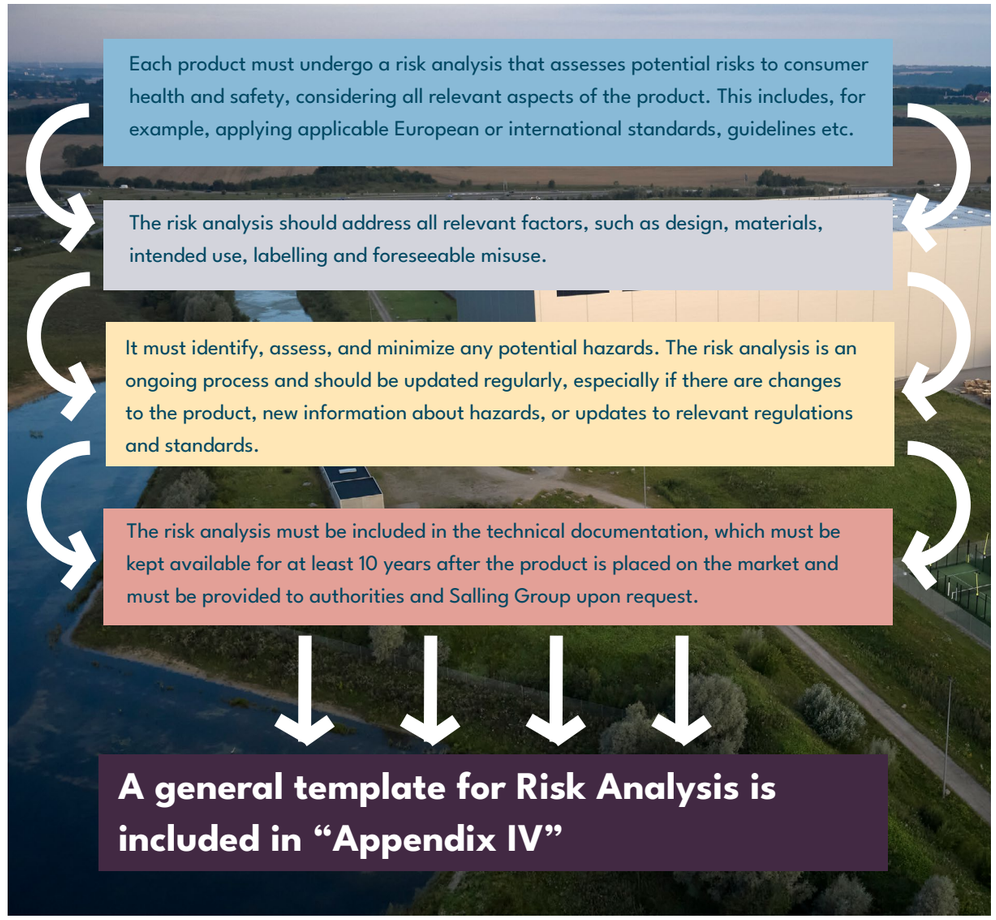
Manufacturers	Must compile technical documentation as part of their compliance with product safety requirements. Obligated to perform a comprehensive safety and risk analysis to identify potential hazards. Any identified risks must be mitigated through appropriate measures to ensure consumer safety.
Product Information	Additional product information must be provided, similar to requirements in harmonized areas. For instance, name, address and electronic address of the manufacturer and importer must be labeled on nonfood and nearfood products unless otherwise regulated by EU legislation.
Labels and Instructions	Manufacturers and importers are required to provide clear, precise, and accurate labels, along with comprehensive user instructions, including Danish safety warnings, to ensure the safe and proper use of the product
Documentation and Record-Keeping	Manufacturers and importers are required to maintain comprehensive records of safety assessments, testing outcomes, and compliance activities. These records must be retained for a minimum of 10 years, as mandated by the product regulation
Safety Business Gateway	Manufacturers, importers, and distributors must report dangerous products through the Safety Business Gateway
Recalls	The regulation establishes clear rules for managing product recalls, including the use of a mandatory recall notice template and specific provisions to ensure consumer remedies
Complaint and Recall Registers	Manufacturers and importers are required to maintain an internal register documenting complaints received, information on accidents related to product safety, as well as records of product recalls and any corrective actions implemented to ensure the product's compliance with safety standards

Table 6: Non-exhaustive list of key provisions of the GPSR.

We encourage all suppliers of products sold to Salling Groups, to keep updated with GPSR and all other relevant legislation.

Risk Analysis and Technical Documentation

To ensure the highest level of consumer safety, Regulation (EU) 2023/988 on General Product Safety (GPSR) requires all manufacturers to conduct an internal risk analysis and prepare technical documentation for all products within the scope of the regulation.



The technical documentation should include:

- General product description
- Internal risk analysis and mitigation measures
- Test reports and evidence of compliance
- List of applied standards and requirements
- Procedures for ongoing conformity
- Consideration of all relevant safety aspects
- Up-to-date records, retained for 10 years

Key Documentation Requirements:

1. **Risk Analysis**
   Assess all potential risks to consumer health and safety, considering the product's labelling, design, materials, intended use, and foreseeable misuse.
   Apply relevant European safety and product standards where possible.

2. **Technical Documentation**
   Prepare documentation with a general product description and essential safety characteristics.
   Include risk analysis, solutions to minimize risks, test results, and a list of applied standards ect.
   If only parts of standards are applied, specify which parts.

3. **Documentation Retention**
   Keep all documentation up to date and available for at least 10 years after the product is placed on the market.
   Provide documentation to authorities and Salling Group upon request.

Product safety documentation should address:

Product characteristics: Design, technical features, composition, packaging, instructions for assembly, installation, use, and maintenance.

Interaction with other products: Effects when used with or influenced by other products.

Presentation and labelling: Including age suitability, warnings, and instructions for safe use and disposal.

Consumer categories: Risks for vulnerable groups (children, elderly, persons with disabilities), and gender-related health and safety impacts.

Product appearance: Potential for misuse, especially if the product resembles food or items appealing to children.

Cybersecurity features: Where relevant, measures to protect against external influences that could impact safety.

Evolving functionalities: For products with learning or predictive features, document how these are managed for safety.

Chemical Requirements

Danish and European legislation impose restrictions on the use of specific chemical substances in various products.

Below is a non-exhaustive overview of key rules, regulations, and requirements (see Table 7):

Legal Basis	Examples of Restrictions
(EC) No 1907/2006 concerning the Registration, Evaluation, Authorisation and Restriction of CHemicals (REACH)	Annex XVII restrictions include: • Plasticizers (phthalates): e.g. DEHP, DBP, BBP and DIBP, DINP, DIDP and DNOP • Benzene • Organostannic compounds • Polycyclic aromatic hydrocarbons (PAHs) • Nickel release • Dimethyl fumarate • Azo dyes • Nonylphenol ethoxylates • Chromium (VI)
(EU) No 2019/1021 on Persistent Organic Pollutants (POP)	Restriction include: • Flame retardants: e.g. DecaBDE, HBCDD, PentaBDE and OctaBDE • Per- and polyfluoroalkyl substances: e.g. PFOA, PFOS and PFHxS and related substances • Short-chain chlorinated paraffins (SCCPs) • Pentachlorophenol (PCP) and its salts and esters
BEK no 464 of 02/05/2025 DK!	• Ban on PFAS in apparel and impregnating agents for clothing or footwear.
2011/65/EU on the Restriction of the use of certain Hazardous Substances in electrical and electronic equipment (RoHS).	Restrictions include: • Heavy metals: e.g. lead, mercury, cadmium, hexavalent chromium. • Flame retardants: e.g. PBBs and PBDEs. • Plasticizers (phthalates): e.g. DEHP, BBP, DBP and DIBP.

2009/48/EC on the safety of toys	**Restrictions include:** • Flame retardants and plasticizers: e.g. TCEP, TCPP and TDCP • Bisphenol A • Formamide • Preservatives/biocides: e.g. isothiazolinones • Phenol • Preservative and polymer precursor: e.g. formaldehyde
Bek no 947 of 20/06/2020 DK!	Restriction on all types of phthalates in toys and childcare articles for < 3 years.
Bek no 856 of 05/09/2009 DK!	Restriction on lead.
Bek no 858 of 05/09/2009 DK!	Restriction on cadmium.
Bek. no 73 of 25/01/2016 DK!	Restriction on mercury.
Salling Group Trade Agreement DK!	• **Salling Group private label products must be delivered in PVC-free packaging.** • **Salling Group private label food and products and materials for food contact must not contain PFAS.** • **Salling Group private label cosmetic products must not contain PFAS.** **Salling Group private label products and products, where Salling Group is regarded as importer:** • Ban on > 0.1 % **SVHC on the Candidate List**

Table 7: Non-exhaustive overview of key Danish and European regulations restricting the use of certain chemical substances in products.

Substances of Very High Concern

Substances of Very High Concern (SVHC) on the Candidate List are substances with hazardous properties, such as being carcinogenic, mutagenic, toxic for reproduction, endocrine-disrupting, persistent, or bioaccumulative.

The following applies for articles containing SVHC supplied to Salling Group (see Table 8):

Prohibition	Salling Group prohibits the presence of more than 0.1% of any SVHC on the Candidate List in private-label products, as well as in any products where Salling Group is considered the importer under Regulation (EC) No. 1907/2006 (REACH). The Candidate List is updated biannually, and vendors are required to stay informed about the latest version.
Vendor Obligations	Vendors must inform Salling Group of any SVHC present in an article or any individual component of an article supplied to Salling Group. Packaging is also considered a separate article and must be assessed accordingly.
Elimination of SVHC	If an article contains SVHC, the vendor must first investigate the possibility of eliminating the use of SVHC in the product. If elimination is not feasible, the vendor must: • Complete the declaration in **Appendix VI** and **Appendix VI** – and submit it to the relevant Salling Group buying department within 14 days of order confirmation. • Provide a detailed explanation of why elimination is not possible. • Submit information about such articles to the SCIP database (Substances of Concern In articles as such or in complex objects (Products)) maintained by the European Chemicals Agency (ECHA).

Table 8: SVHC requirements.

Salling Group reserves the right to conduct spot checks on products supplied to ensure compliance with SVHC requirements.

Claims for Product Features

Vendors are responsible for ensuring accurate and compliant product labeling, including any claims made about the product.

In accordance with Danish legislation, the following types of claims (see Table 9) must always be thoroughly documented:

DK!

Sustainability or green claims	• Sustainable • Green • eco-friendly • CO_2 neutral
Performance Claims	• Efficient • Strong • Waterproof • Windproof
Certification Claims	• Recycled • OEKO-TEX® • GRS • Organic

Table 9: Examples of claim types for product features.

Guidelines for Sustainable or Green Claims

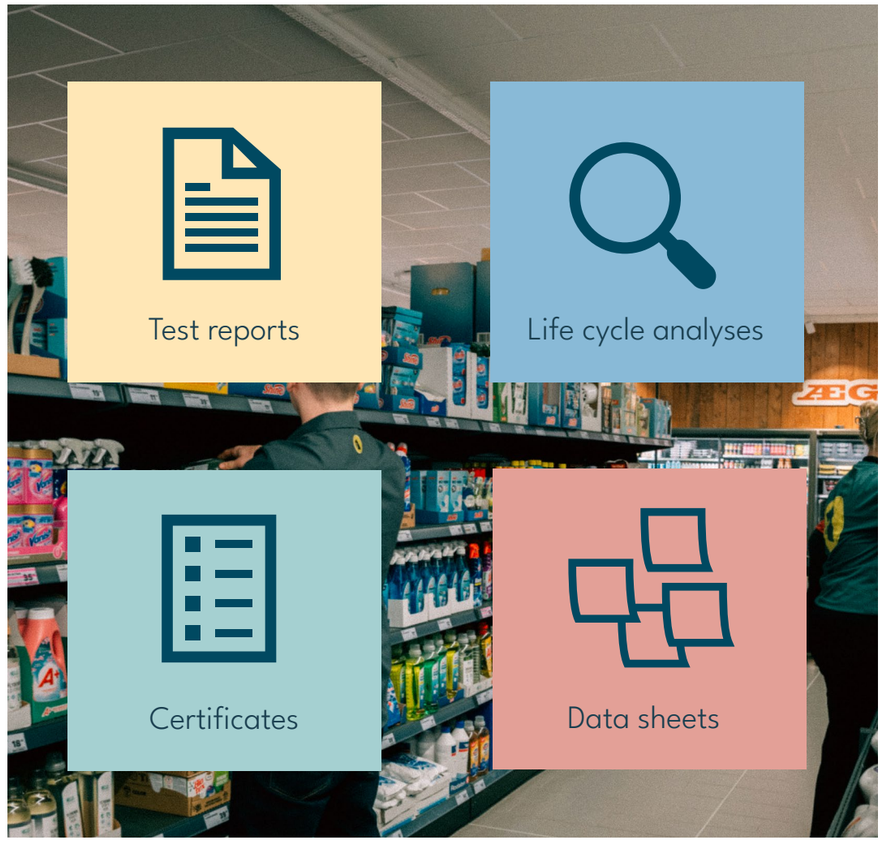
To use sustainability or green claims, the following principles must be adhered to (see Table 10):

Accuracy and Precision	Clearly specify whether the claim applies to the company, specific activities, the entire product, or only parts of the product.
Relevance	The claimed benefit must be significant and directly relevant compared to similar or alternative products
Balanced Claims	Do not omit essential information. Claimes benefit must not be common for similar products. Do not emphasize product qualities that are legally required.
Documentation	Must be available at the time the claim is first marketed. Must be supported by statements from independent, professionally competent bodies. Significant disagreement among experts must be disclosed in the marketing. Claims must be regularly updated to reflect new legislation, technical knowledge, or market developments. Claims must remain relevant and accurate at the time of marketing.

Table 10: Principles for sustainable or green claims.

All documentation must be submitted to the relevant buying department unless otherwise agreed. Without valid documentation, vendors are not permitted to use claims for the product.

Examples of documentation to be submitted include:



CE-Marked Products

General Requirements

Introduction

The CE mark serves as a key indicator of a product's compliance with EU legislation and facilitates the free movement of goods within the European market. By affixing the CE mark, the manufacturer declares, under their sole responsibility, that the product meets all legal requirements for CE marking. This also applies to products manufactured in third countries.

The CE mark must typically be affixed to the product, an attached label, or the packaging. It must be at least 5 mm in height, visible, and easily legible. The required placement of the CE mark may vary. Specific requirements for its placement can be found in the relevant regulation/directive. The CE mark can be downloaded **here**.

Not all products require CE marking. Only product categories covered by specific CE marking regulations or directives must bear the CE mark (see Table 12). The CE mark does not indicate that a product was manufactured within the European Economic Area (EEA) but rather confirms that the product has been assessed before being placed on the market and complies with the legal requirements for sale (e.g. harmonized safety standards). This means the manufacturer has ensured that the product meets all relevant essential requirements outlined in the applicable regulation(s)/directive(s) or that it has been assessed by a notified body for conformity, if required.

The manufacturer is responsible for conducting the conformity assessment, preparing the technical documentation, issuing the EU Declaration of Conformity, and affixing the CE mark to the product. For products imported from non-EU countries, the importer must ensure that the manufacturer has fulfilled all required obligations and that the necessary documentation can be provided upon request.

It is important to note that the CE mark signifies the manufacturer's declaration that the product meets all relevant essential requirements of the applicable regulation(s)/directive(s). Certain products must not bear the CE mark if they fall under a regulation or directive for which the EU has not established CE marking requirements (see Table 12 for example og specific regulations and directives).

Be aware that a product may fall under more than one regulation/directive. For instance, an electric kitchen machine could be subject to both the rules for machinery and low-voltage products as well as the requirements for hazardous substances and for products intended for direct contact with food and beverages.

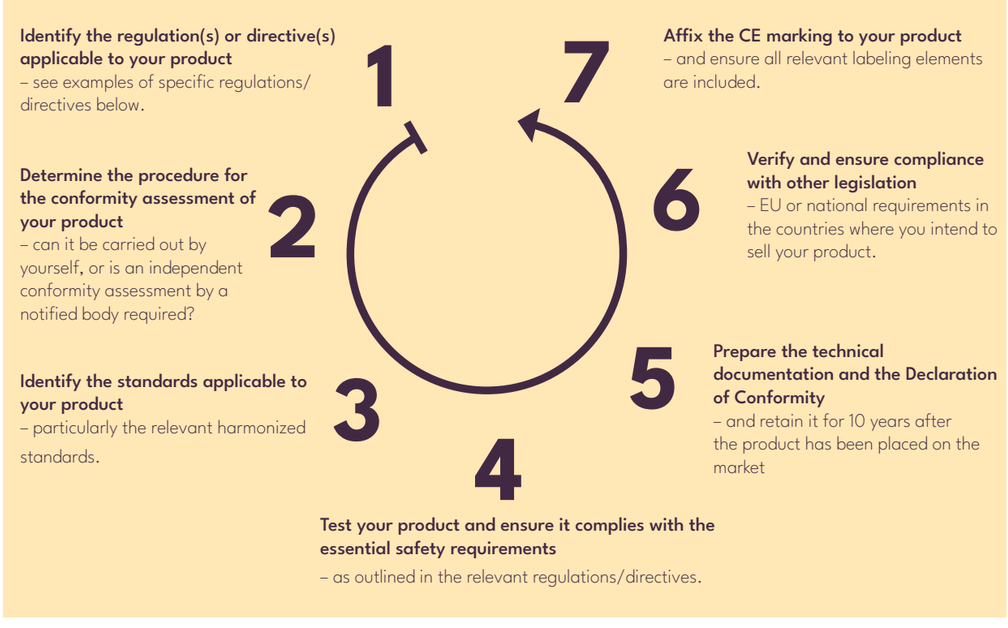
Documentation

As a general rule, the manufacturer must retain the technical documentation, test reports, and the EU Declaration of Conformity for at least 10 years from the last date the product was made available on the market. However, the required retention period for technical documentation may vary and is specified in the relevant regulation or directive.

Importers must ensure that the technical documentation is available for ten years after the product has been made available on the market. They must also retain a copy of the EU Declaration of Conformity for the same period.

Distributors are required to verify that the CE mark is present and that the necessary supporting documentation is available. As a general rule, Salling Group requires the EU Declaration of Conformity, test reports, and artwork to verify labeling requirements. Salling Group reserves the right to request additional information and documentation as needed.

Check List



Specific Regulations and Directives

Product types	Description
Appliances burning gaseous fuels (GAR)	(EU) 2016/426 on appliances burning gaseous fuels (GAR). • Products such as cooking appliances, storage water heaters, space heaters, weed burners and grills using gaseous fuels are covered by GAR.
Batteries	2006/66/EC on batteries and accumulators applies until 18 August 2025. (EU) 2023/1542 on batteries applies gradually from 18 August 2024. • Products such as build-in batteries and portable batteries like AA and coin cell batteries are covered by the battery regulation.
Chemicals in electrical and electronic equipment - RoHS	2011/65/EU on the Restriction of the use of certain Hazardous Substances in electrical and electronic equipment (RoHS). • All equipment which is dependent on electric currents or electromagnetic fields in order to work properly are covered by RoHS.
Construction products. Commonly products which are permanently affixed in the household.	(EU) No 305/2011 on construction products. • Products such as floorings, space heating appliances, fixings, doors and windows are construction products.
Drones	(EU) 2019/945 on on unmanned aircraft systems including drones.
Electric and electronic products	2014/30/EU on ElectroMagnetic Compatibility (EMC). • Appliance intended for the end-user and liable to generate electromagnetic disturbance, or the performance of which is liable to be affected by such disturbance are covered by EMC.
Electrical equipment designed for use within certain voltage limits.	2014/35/EU on electrical equipment designed for use within certain voltage limits (low voltage) .
Energy-using products	2009/125/EC on ecodesign requirements for energy-related products (ErP). • Products such as light sources, household appliances, eletronic displays, coffee makers and vacuum cleaners are considered energy-using products. • Some energy-using products also require energy labelling.
Fertlilzers	(EU) 2019/1009 on EU fertilising products.
Fireworks and similar pyrotechnical articles.	2013/29/EU on pyrotechnical articles including fireworks.
Machinery	2006/42/EC on machinery (EU) 2023/1230 on machinery apply from 20 January 2027 • Electrical products like gardening tools, gardening machines, beds, tables, chairs and bicycles are machinery.
Measuring instruments	2014/32/EU on measuring instruments (MID). • Measuring instruments primarily for professional and industrial use are covered by the MID.
Medical devices	(EU) 2017/745 on medical devices. • Products such as blood pressure meters, reading glasses, compression socks, plasters and bandages are medical devices.
Medical devices for in vitro diagnostic	(EU) 2017/746 on in vitro diagnostic medical devices. • Products such as home pregnancy tests and COVID-19 test medicinal devices for in vitro diagnostic.
Products designed to protect the user.	(EU) 2016/425 on personal protective equipment (PPE). • Products such as oven gloves, protective gloves and ear muffs are covered by PPE.
Radio equipment	2014/53/EU on radio equipment (RED). • Electrical or electronic product, which intentionally emits and/or receives radio waves are covered by RED.
Toys	2009/48/EC on the safety of toys (TSD). • Products designed or intended, whether or not exclusively, for use in play by children under 14 years of age.

Table 11: Non-exhaustive overview of specific regulations and directives covered by CE marking requirements.

Find relevant product specific European, international or national standard to determine applicable limits, testing and measurements techniques. If possible use **harmonized standards**.

Electrical and Electronic Equipment

Consumer electronics include electronic devices designed for everyday use, primarily in private households. This category covers a wide range of products such as televisions, audio systems, smartphones, tablets, laptops, wearable devices, small domestic appliances, lamps, string lights, electronic toys, kitchen gadgets, and personal care devices like electric toothbrushes or hairdryers. These products may be powered by mains electricity (plug-in) or batteries, including button cell batteries or rechargeable options. All such products must comply with various EU regulations/ directives and standards to ensure safety, electromagnetic compatibility, and environmental protection.

Documentation Requirements

To ensure compliance, vendors are required to provide the following documentation:

- EU Declaration of Conformity (DoC).
- CE marking on both the product and/or its packaging.
- Technical documentation, including test reports and risk analyses.
- User instructions and safety information in the official language(s) of the destination country.

Applicable Regulations and Directives

The following EU directives apply to the majority of electrical and electronic equipment:

- 2014/30/EU: Electromagnetic Compatibility (EMC) Directive.
- 2012/19/EU: Waste Electrical and Electronic Equipment (WEEE) Directive.
- 2011/65/EU: Restriction of Certain Hazardous Substances (RoHS) Directive.

Product-Specific Requirements

Additional requirements may apply depending on the specific type of electrical or electronic product.

Products	Legal Basis
Electrical equipment designed for use within certain voltage limits.	2014/35/EU on electrical equipment designed for use within certain voltage limits (low voltage)
Radio equipment	2014/53/EU on radio equipment
Ecodesign	2009/125/EC Framework for the setting of eco-design requirements for energy-related products Find relevant product specific regulations.
Energy label	(EU) No 2017/1369 Framework for energy labelling Find relevant product specific regulations.
Internet connected gadgets	Protection of personal sensitive data
Batteries	2006/66/EC on batteries and accumulators
Ingress Protection Rating	2014/35/EU on electrical equipment designed for use within certain voltage limits (low voltage)

Table 12: Non-exhaustive list of product-specific requirements for electrical and electronic equipment, detailing additional obligations based on product type.

Waste Electrical and Electronic Equipment (WEEE)

The WEEE Directive applies to most electrical and electronic equipment.
Products covered by this directive must be marked with the crossed-out wheeled bin symbol to indicate that they should not be disposed of with household waste.

In addition, the product packaging or instruction manual must include a statement equivalent to the following:
For at beskytte miljøet skal elektrisk udstyr bortskaffes særskilt fra husholdningsaffald. Kontakt kommunen for nærmeste indsamlingssted.

This translates to:
To protect the environment, electrical equipment must be disposed separately from household waste. Contact the municipality for the nearest collection point.

Batteries

Overview of EU Battery Regulation (EU) 2023/1542

The EU Battery Regulation (EU) 2023/1542 replaces the Battery Directive 2006/66/EC and introduces new requirements for sustainability, safety, and lifecycle of batteries and battery-operated products.
The regulation includes multiple provisions with staggered implementation timelines, impacting the entire battery supply chain.

Battery Categories

The regulation applies to various battery types, each with specific requirements (see Table 13):

Portable battery	Batteries which are sealed, weigh 5 kg or less. Portable batteries of general use are a portable batteries, whether or not rechargeable, that are specifically designed to be interoperable and which have one of the following common formats 4,5 Volts (3R12), button cell, D, C, AA, AAA, AAAA, A23, 9 Volts (PP3).
Light means of transport battery (LMT battery)	Batteries which are sealed, weigh 25 kg or less and are specifically designed to provide electric power for the traction of wheeled vehicles that can be powered by an electric motor alone or by a combination of motor and human power.
Starting, lighting and ignition battery (SLI battery)	Batteries which are specifically designed to supply electric power for starting, lighting, or ignition and that can also be used for auxiliary or backup purposes in vehicles, other means of transport or machinery.
Electric vehicle battery	Batterise which are specifically designed to provide electric power for traction in hybrid or electric vehicles of category L, that weigh more than 25 kg, or batteries which are specifically designed to provide electric power for traction in hybrid or electric vehicles of categories M, N or O.
Industrial battery	Batteries which are specifically designed for industrial uses, intended for industrial uses after having been subject to preparation for repurposing or repurposing.

Table 13: Battery types in (EU) 2023/1542.

Key Updates in the Regulation

Non-exhaustive list of examples of key updates in (EU) 2023/1542.

Energy Labels

Energy labeling provides consumers with essential information about a product's energy efficiency and performance and is mandatory for specific product categories. The labels use a standardized scale (A to G) with color codes to indicate energy efficiency, enabling consumers to make informed purchasing decisions while encouraging manufacturers to improve energy performance.

- Light sources and separate control devices.
- Dishwashers, washing machines, and dryers.
- Fridge-freezers, ovens, and extractors.
- Televisions and electronic displays.
- Smartphones and tablets

For Smartphones:

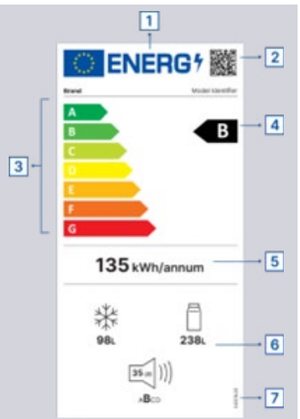
- Eco-design requirements apply from 20 June 2025
- Energy label include:
  - Energy efficiency.
  - Battery longevity.
  - Protection from dust and water.
  - Resistance to accidental drops and a reparability score.

Excerpt of an energy label for smartphones and tablets.

Understanding the Energy Label

Energy labels rank appliances on a scale from A (green, most energy-efficient) to G (red, least energy-efficient). Key elements of the label include (see Figure 3):

1. Language-neutral logo (e.g., “ENERG” with a bolt symbol).
2. QR code linking to the EPREL database.
3. Energy efficiency classes (A to G scale).
4. Energy efficiency class of the specific product model.
5. Energy consumption details.
6. Additional non-energy parameters (e.g., noise emissions, water consumption, capacity, repairability).
7. Reference to the applicable regulation.



Example of an energy label.

EPREL

The manufacturer or importer is required to register energy-labeled products in the European Product Registry for Energy Labelling (**EPREL**).

Where Salling Group is considered the manufacturer or importer of energy-labeled products, vendors are obligated to ensure timely registration of all required information in EPREL on behalf of Salling Group. Vendors must register as a Supplier User under Salling Group by contacting **kvalitetsafd_nf@sallinggroup.com**

Machinery

Machinery, as defined under EU legislation, includes a wide range of products designed to perform specific tasks using mechanical, electrical, or electronic components. Examples include gardening tools, machinery, electric beds, tables, chairs, and bicycles. These products are subject to strict safety and compliance requirements under the EU Machinery Directive and the upcoming Machinery Regulation.

On June 14, 2023, the new Machinery Regulation (EU) 2023/1230 was published, replacing the current Machinery Directive 2006/42/EC. The new regulation will take effect on January 20, 2027, across all EU countries. Manufacturers, importers, and distributors of machinery must adapt to the updated legislation to ensure compliance.

Key Points

Directive	The Machinery Directive 2006/42/EC applies to machinery such as gardening tools, electric beds, tables, chairs, and bicycles.
New regulation	The Machinery Regulation (EU) 2023/1230 expands the scope to include machinery and related products.
Transition period	After January 2027, machinery placed on the market under the Machinery Directive can continue to be sold. EC type examination certificates issued under the directive will remain valid until their expiration.
Digital documentation	A significant update in the new Machinery Regulation is the allowance for digital instructions for use and EU Declarations of Conformity, provided they meet specific requirements.
Language requirements	For consumer products, safety information and user manuals must still be provided in printed form and in Danish. Declaration of Conformity must also be available in Danish
Standards and testing	Applicable limits, testing methods, and measurement techniques must align with relevant European, international, or national standards, preferably **harmonized standards**.

Table 15: Examples of key point for regulatory requirements for machinery.

Toys

The Toy Safety Directive 2009/48/EC defines a toy as: "*Any product or material designed or intended, whether or not exclusively, for use in play by children under 14 years of age.*"

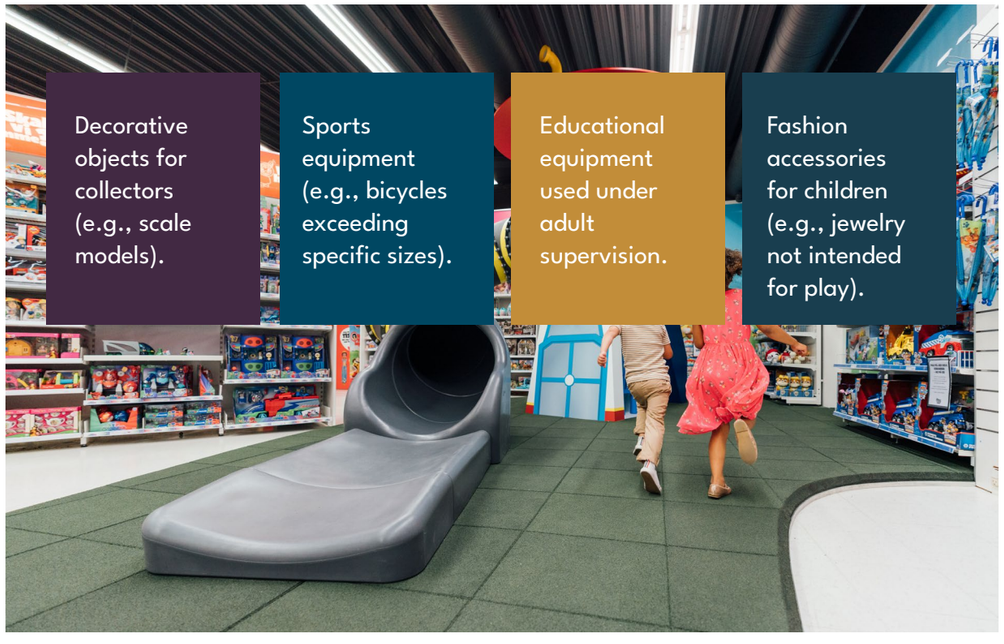
This definition encompasses a wide range of products, including traditional toys like dolls, puzzles, and building blocks, as well as modern items such as interactive electronic toys and educational kits, provided they are intended, whether exclusively or not,for play by children under 14.

Key point of the definition (see Table 16):

Intended Use	A product designed or intended, whether exclusively or not, for use in play.
Target Age	A product intended for play by children under the age of 14.
Broad Scope	Includes unconventional items marketed or presented as toys, even if they do not resemble traditional toys

Table 16: Non-exhaustive list of key point of the definition of toy in The Toy Safety Directiver 2009/48/EC.

Certain products are however not considered toys under the directive, including:



Applicable Standards

The following standards set the minimum safety requirements for the majority of toys. Additional testing may be required depending on the product:

- EN 71-1: Mechanical and physical properties.
- EN 71-2: Flammability.
- EN 71-3: Migration of certain elements.

Product-Specific Requirements

Additional requirements may apply depending on the specific type of toy (see Table 17)

Products	Description
All toys	Safety assessment including a chemical safety assessment.
Electrical toy	EN 62115 (electric toy safety) Read the section "Electrical and Electronic Equipment", as electrical toys are covered by other legislation as well.
Chemical mixtures	EN 71-4 (experimental sets for chemistry and related activities) EN 71-5 (chemical toys (sets) other than experimental sets) TRA (toxicological risk assessment)
Make-up set	EN 71-13 (safety of olfactory board games, cosmetic kits and gustative games) Cosmetic safety assessment report
Finger paint	EN 71-7 (finger paints) TRA (toxicological risk assessment)
Trampoline	EN 71-14 (trampolines for domestic use)
Activity toy	EN 71-8 (activity toy, e.g. swings, seesaws, jungle gyms, playhouse for domestic use)
Olfactory and gustative games	EN 71-13 (safety of olfactory board games, cosmetic kits and gustative games)
Toy w. high water content, e.g. slime, paint, modelling clay, soap bubble	Antimicrobial effectiveness test (acc. ECF-type approval protocol No. 2 Microbiological safety of toys containing aqueous media)
Toys w. characteristic smell	Emission test and risk assessment

Table 17: Non-exhaustive list of examples of additional toy-specific requirements.

Food Contact Materials

Products intended for or expected to be used in direct contact with food and beverages (food contact materials, FCM) are subject to specific regulations. These regulations aim to ensure that the products do not:

- Endanger human health.
- Cause an unacceptable change in the composition of the food.
- Lead to a deterioration in the organoleptic characteristics of the food.

All FCM must comply with the following regulations:

- Regulation (EC) No 1935/2004 on materials and articles intended to come into contact with food.
- Regulation (EC) No 2023/2006 on good manufacturing practice for materials and articles intended to come into contact with food.

FCM may also be subject to specific provisions that limit the migration of certain chemical substances into food or beverages. While several types of materials currently lack specific EU requirements, mutual recognition exists among EU member states. Therefore, guidelines such as the industry guideline, recommendations from German Federal Institute for Risk Assessment (BrF), or requirements from the U.S. Food and Drug Administration (FDA) may be relevant to consult depending on the material in question.

DK! In Denmark (BEK no 681 of 25/05/2020), all FCM must be accompanied by a declaration of compliance throughout the supply chain, from the manufacturer of raw materials to, for example, the producer of food or finished FCM. The declaration of compliance serves as a summary of the company's control measures and must demonstrate that the material complies with applicable regulations. Any limitations on the use of the material must be clearly specified, such as the types of food it can be used for and the time and/or temperatures at which it can be applied. Product-Specific Requirements

Material	Description
Plastic aterials and articles	Regulation (EU) No 10/2011 establishes requirements for plastic materials and articles intended to come into contact with food. This regulation ensures the safety and compliance of such materials within the EU market.
Polyamide and melamine plastic kitchenware	Regulation (EU) No 284/2011 outlines specific conditions and detailed procedures for the import of polyamide and melamine plastic kitchenware originating from or consigned by the People's Republic of China and the Hong Kong Special Administrative Region. These measures aim to ensure the safety and compliance of imported kitchenware.
Food-contact packaging	Regulation (EU) 2025/40 on packaging and packaging waste (PPWR) introduces restrictions on the use of per- and polyfluorinated alkyl substances (PFAS) in food-contact packaging. This regulation is part of the EU's efforts to reduce environmental and health risks associated with harmful substances in packaging materials.
Adhesives, rubbers, ion-exchange resins, plastics, printing inks, silicones, varnishes and coatings.	Regulation (EU) 2024/3190 prohibits the use of bisphenol A (BPA) and other hazardous bisphenols and their derivatives.

Table 18: Non-exhaustive list of examples of additional specific requirements for FCM.

Cosmetic Products

Cosmetic products are regulated under Regulation (EC) No 1223/2009, which defines a cosmetic product as:

"*any substance or mixture intended to be placed in contact with the external parts of the human body (epidermis, hair system, nails, lips and external genital organs) or with the teeth and the mucous membranes of the oral cavity with a view exclusively or mainly to cleaning them, perfuming them, changing their appearance, protecting them, keeping them in good condition or correcting body odours*".

Examples of products regarded as cosmetic products:

Regulatory Requirements

Cosmetic products must meet several regulatory requirements to ensure consumer safety and compliance (see Table 19):

Safety Assessment	All cosmetic products must undergo a comprehensive safety assessment. A Cosmetic Safety Report must be prepared as part of the Product Information File (PIF) before the product is placed on the market. This report includes details such as the product's quantitative and qualitative composition, intended and foreseeable use, exposure levels, and the toxicological profile of ingredients
Labelling	Products must be labeled with essential information, including the product's function, ingredients, content, and usage instructions. The label must also include the name of the responsible person, who ensures the product complies with the relevant regulations
Market Notification	Before being placed on the market, cosmetic products must be registered in the Cosmetic Products Notification Portal (CPNP).

Table 19: Non-exhaustive list of examples of regulatory requirements for cosmetic products.

Be aware that cosmetic products can also be covered by Regulated Precursors.

Detergents

Detergents must comply with the EU Detergent Regulation (EC) No. 648/2004, which sets requirements for permitted ingredients, labeling, and ingredient data sheets to ensure safety and transparency for consumers and authorities.

Key Requirements:

Permitted Surfactants	• All surfactants must undergo ultimate aerobic biodegradation according to harmonized test methods specified in the regulation. This includes amphoteric and cationic surfactants. • Phosphates are prohibited in consumer laundry detergents and automatic dishwasher detergents.
Ingredient Declaration	Packaging for detergents and cleaning products marketed to consumers must be labeled with the following information in legible, visible, and indelible characters: • Dosage instructions. • Address of a website providing free access to a list of all product ingredients. • Declaration of ingredients in weight percentage ranges as defined in the regulation. • Preservatives, enzymes, disinfectants, optical brighteners, and perfumes must be declared regardless of their concentration.
Ingredient Data Sheet	Manufacturers and importers must maintain an ingredient data sheet listing all ingredients, including CAS numbers and weight percentage ranges. This data sheet must be made immediately and freely available to medical professionals and national authorities upon request.

Table 20: Non-exhaustive list of requirements for detergents.

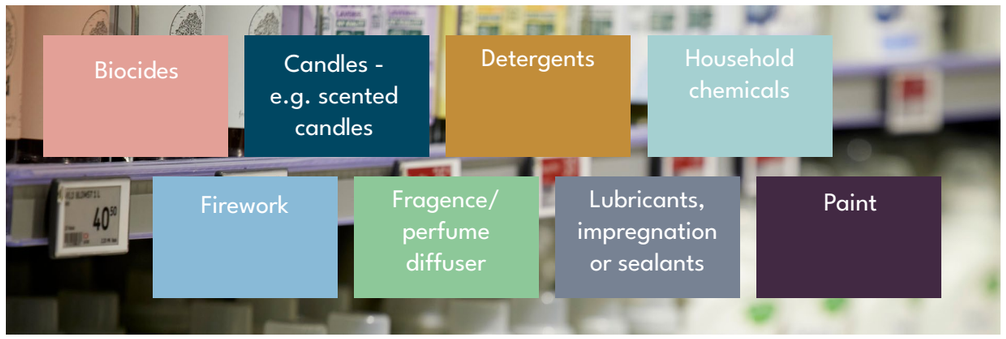
Detergents are also classified as chemical products, and vendors must ensure compliance with Classification, Labelling, and Packaging, Regulated Precursors and Safety Data Sheets.

Chemical Products

Chemical products are defined as substances or mixtures where the chemical composition plays a more significant role in the product's function than its form or design..

These products require special attention to ensure consumer safety. Measures must be taken to inform consumers about necessary precautions and actions to take in case of accidents. Additionally, chemical substances and mixtures may be subject to requirements for safety data sheets (SDS) or regulations concerning explosive precursors.

Examples of products regarded as chemical substances and mixtures:



Classification, Labelling and Packaging of Substances and Mixtures

Depending on the hazards associated with the product, chemical products must be labeled in accordance with Regulation (EC) No 1272/2008 on Classification, Labelling, and Packaging of Substances and Mixtures (CLP) to ensure consumers are informed about necessary precautions and actions to take in case of accidents.

CLP labels must be legible, visible, and indelible, and they must appear on the packaging in which the product is made available to consumers. The labeling includes essential elements such as pictograms, signal words, and hazard and precautionary statements, all determined by the classification of the substance or mixture for hazardous properties.

CLP Labelling Requirements

The following standards apply to CLP labeling:

- Text must be printed in black on a white background.
- A single, sans-serif font must be used for easy readability.
- Sufficient spacing between letters must be ensured for clarity.
- Line spacing must be at least 120% of the font size.
- Minimum dimensions for labels must be adhered to (see Table 21):

Volume	Dimensions (mm) for hazard label	Pictograms dimensions (mm)	Minimum font size (x-height in mm)
Not exceeding 0.5 L	If possible, at least 52 x 74	Not less than 10 x 10, if possible 16 x 16	1.2
Over 0.5 L, but not exceeding 3 L			1.4
Over 3 L, but not exceeding 50 L	At least 74 x 105	At least 23 x 23	1.8
Over 50 L, but not exceeding 500 L	At least 105 x 148	At least 32 x 32	2.0
Over 500 L	At least 148 x 210	At least 46 x 46	2.0

Table 21: Minimum dimensions and font size for CLP labels.

Safety Data Sheet

Safety Data Sheets (SDS) are essential tools used in the EU to communicate information about the safe use of substances and mixtures within the supply chain. The requirement to prepare safety data sheets is an integral part of REACH (Article 31).

SDS must be prepared by a technically competent person and must consist of 16 sections with several subsections as defined in Annex II of the REACH Regulation. It must be written in the national language of the country where the product is sold or marketed

Chemical substances and mixtures must be supplied with a SDS if they meet the following requirements:

- If the substance or mixture meets the criteria for classification as hazardous under the CLP
- If the substance is persistent, bioaccumulative and toxic (PBT) or very persistent and very bioaccumulative (vPvB)
- If the substance is on the Candidate list.

Additionally, SDSs must be prepared if a mixture does not meet the criteria for classification as hazardous but contains (see Table 22):

At least one substance posing a hazard to human health or environmental in an individual concentration of ≥ 1% by weight for non-gaseous preparations and ≥ 0.2% by volume for gaseous preparations.	
At least one substance in an individual concentration of ≥ 0.1% by weight for non-gaseous mixtures that is	• Carcinogenic category 2 • Toxic to reproduction category 1A, 1B, or 2 • A skin sensitiser category 1 • A respiratory sensitiser category 1 • Having effects on or via lactation • Persistent, bioaccumulative, and toxic (PBT) • Very persistent and very bioaccumulative (vPvB) • Included in the Candidate List
A substance for which there are Community workplace exposure limits.	

Table 22: Example og criteria for SDS for non-classified mixtures.

As a vendor to Salling Group, you must supply the safety data sheets in accordance with Annex II of Regulation (EC) No 1907/2006 in the national language of the countries where the product is marketed by Salling Group.

Regulated explosives precursor

Salling Group does not sell restricted explosive precursors. However, several common consumer products fall under the category of regulated explosives precursors.

When a regulated explosive precursor is made available by a vendor, Salling Group must be informed of the obligation to report suspicious transactions, significant losses, and thefts.

Vendors must, when delivering products meeting the criteria for explosive precursors or regulated explosive precursors as defined in Regulation (EU) 2019/1148 on the marketing and use of explosives precursors, inform Salling Group's Quality Department by email at **kvalitetsafd_nf@sallinggroup.com** no later than the date of shipment.

The following defines the criteria for regulated explosive precursors:

- Chemical mixtures containing more than 1% w/w of the substances listed in the regulation.
- Chemical mixtures with fewer than five ingredients containing one or more of the substances listed in the regulation at any concentration.

Textiles, Feathers & down

Textiles

Products wholly or partially consisting of textile materials are covered by labelling requirements in, Regulation (EU) No 1007/2011 on textile fibre names and related labelling and marking of the fibre composition of textile products.

The product must comply with the agreed quality requirements as outlined by the Buying Department.

Vendors of Private Label textiles must comply with the agreed quality requirements as outlined by the Buying Department and follow applicable requirements set out in the separate **Manual for Textile Suppliers**, **Safety in Children's Wear**, **Policy on Animal Welfare for Textile and Nonfood** as well as other applicable regulations, e.g. GPSR.

The Danish and European legislation also restricts chemical substances in various products.

Documentation requirements for certified fibres

For Private Label products claiming certified fibre content (e.g., recycled or organic fibres), Salling Group requires valid documentation. Any other claims made on products sold in Salling Group stores must also be supported by valid documentation.

OEKO-TEX®

Salling Group holds an advertising certificate (No. 776-12201 DTI) covering all products sold across its formats, including:

Key requirements for products claiming OEKO-TEX® certification

Requirement	Description
Testing of Components	Every component of the product (fabric, threads, zippers, buttons, etc.) must be tested for harmful substances to obtain a valid certificate.
Submission of Documentation	Vendors must email the following to Salling Group's Quality Team at **kvalitetsafd_nf@sallinggroup.com** before the first shipment: • A valid OEKO-TEX® certificate. • A list of specific products purchased under the certificate. • Exact compositions as per the care label of the certified articles.
Correct Use of OEKO-TEX® Labelling	Vendors are responsible for: • Using correct OEKO-TEX® logo on hangtags and care labels, following the latest OEKO-TEX® labelling guide. • Including traceability information in the care label (valid OEKO-TEX® certificate number and testing institute name). • Verifying that the OEKO-TEX® logo on shipment samples aligns with the valid certificate and making adjustments if necessary.
Monitoring and Renewal of Certificates	Vendors must: • Continuously monitor the status of all OEKO-TEX® certificates and provide updated certificates and information to the Quality Team. • Apply for certificate renewal at least two months before expiration if the certificate is still in use. Updated certificates must be sent to **kvalitetsafd_nf@sallinggroup.com**. • If renewal is delayed, a processing letter must be provided to inform the quality department of the expected timeline.

Table 23: Non-exhaustive list of requirements for products claiming OEKO-TEX® certification

Feathers & down

Vendors must label feathers and down as specified in EN 12934. Furthermore, vendors of products with feathers or down, must provide one of the following certificates per order:

The certificate must be E-mailed to the Salling Group Buying Department. The E-mail header must contain all Salling Group's order numbers which the certificate is valid for. The documents must be received by the buying department before products are departured to Salling Group.

Salling Group does not accept feathers for decorative purposes according to **Policy on Animal Welfare for Textile and Nonfood**.

Genuine Leather

Vendors supplying genuine and recycled leather must outline their supply chain in Salling Group's Responsible Sourcing system.
Final manufacturing and applied tanneries located in high-risk countries must hold a valid social- and environmental audit.

All production sites in scope must be audited annually and existing non-compliances must be resolved per the audit report's deadlines.

- Commonly applied social audits include: **amfori BSCI** and **Sedex SMETA**.
- Commonly applied environmental audits include: **Leather Working Group (LWG)** and **Sustainable Leather Foundation (SLF)**

Please contact **Responsible@sallinggroup.com** for more information on Salling Group's requirements for responsibly sourced leather.

Appendices

The following pages contain relevant appendices referenced in the Nonfood Vendor Manual. These documents serve as inspiration and guidance for vendors to ensure compliance with Salling Group's requirements and standards.

The documents can be found as templates through below link.

DOWNLOAD TEMPLATES HERE

Templates - Nonfood Vendor Manual

Appendix I

Declaration of Conformity

The declaration of conformity should include vendor logo, name and address as page header and footer

Varieties of the declaration of conformity

It is important to note that the format and specific content required in a Declaration of Conformity (DoC) can vary depending on the regulation/directive. For instance, the DoC for toys must include a color picture, while pyrotechnic articles require a unique registration number. In contrast, food contact materials demand a completely different format for the DoC. Refer to Appendix II for template regarding DoCs for food contact materials.
Vendors working with Salling Group must ensure that the DoCs they provide comply with the format and requirements specified in the relevant regulations/directives.

EU Declaration of Conformity	
Unique identification (product, type, batch, serial, registration number, appliance or fitting etc.):	
Name	
Model	
EAN	
Art. No.	
Lot No.	
Name and address of the manufacturer (or his authorized representative):	
Name	
Address	
Electronic address	
This declaration of conformity is issued under the sole responsibility of the manufacturer:	
Name	
Address	
Electronic address	
Object of the declaration (identification of the product allowing traceability):	
Color picture or identification	
The object of declaration is in conformity with the relevant EU harmonisation legislation:	
EU legislation	
Reference to the relevant harmonized standards used or references to the other technical specification in relation to which conformity is declared:	
Applied standards	
(If applicable) The notified body:	
The notified body performed and issued the certificate	
Name	
Adress	
Notified body number	
In addition to the above:	
Additional information	
Other relevant legislation	
Signature:	
_____ Name Title	Place and date

Appendix II

Declaration of Compliance

The declaration of conformity should include vendor logo, name and address as page header and footer.

Declaration of Compliance			
Unique identification (product, type, batch, serial, registration number, appliance or fitting etc.):			
Name			
Model			
EAN			
Art. No.			
Lot No.			
Name and address of the producer/manufacturer:			
Name			
Address			
Electronic address			
Object of the declaration (identification of the product allowing traceability):			
Color picture or identification			
Legal Provision:			
We as manufacturer declares the above mentioned products, comply with applicable regulations and requirements including (EC) No 1935/2004 with any later amendments, Danish act: BEK nr 681 af 25/05/2020 and the following material specific requirements:			
GMP:			
We as manufacturer declares that above mentioned products follow the requirements in EU regulation 2023/2006 with any later amendments in our production.			
The Product is suitable for direct contact with:			
Food types:			
Permissible time and temperature during contact with Food:			
The product is suitable for direct food contact under the following temperature:			
Time:		Temperature:	
Restrictions in Use:			
The product is not applicable for:			
Other information, as applicable:			
The products contain following substances with restrictions ((EU) 10/2011):			
The products contain following dual use additives:			
The highest food contact surface area to volume ration for which compliance has been verified:			
Bisphenols or bisphenol derivatives used in product ((EU) 2024/3190):			
Other relevant information:			
Signature:			
_____ Name, Title		Place and date	

Appendix III

Link between Documents Supplier Statement

Link between Documents Supplier Statement

We hereby declare the below mentioned product is identical to the specified items tested in below mentioned test reports.	
Date:	
Supplier, name and address:	
Name:	
Signature:	

Identity of Product	
Item number, at Salling Group:	
Item number, at supplier:	
Item name:	
EAN number:	
Order/batch number, if applicable:	

Test report	
Item number/Item name/ Sample description in test report:	
Report No.:	
Date of the test report:	
Conducted test(s)/Standard(s):	

Test report	
Item number/Item name/ Sample description in test report:	
Report No.:	
Date of the test report:	
Conducted test(s)/Standard(s):	

Test report	
Item number/Item name/ Sample description in test report:	
Report No.:	
Date of the test report:	
Conducted test(s)/Standard(s):	

Appendix IV

Risk Analysis EU 2023/988 (GPSR)

This risk analysis is a general template and should be adapted to the specific product and relevant risks. The declaration of conformity should include vendor logo, name and address as page header and footer.

Risk Assessment (EU) 2023/988	
Product Identification:	
Name/model	[Insert product name or model]
EAN/Art. No./Lot No.	[Insert relevant identification numbers]
Product Category	[Insert product category, e.g., toys, electronics, household appliances]
Description	[[Provide a brief description of the product]
Target Audience	[Specify the target audience, e.g., children, adults, elderly]
Name and address of the manufacturer (or his authorized representative):	
Name	[Insert manufacturer's name or authorized representative]
Address	[Insert manufacturer's address]
Electronic address	[Insert manufacturer's email or website]
Risk Identification:	
Physical Risks	[Risk of injuries due to sharp edges, small parts, or electrical faults]
Chemical Risks	[Risk of exposure to hazardous substances]
Usage Risks	[Risk of improper use leading to injuries]
Environmental Risks	[Risk of environmental damage during disposal]
Risk Severity Assessment:	
Likelihood	[How likely is the risk to occur? (Low, Medium, High)]
Consequence	[How severe is the consequence if the risk occurs? (Low, Medium, High)]
Overall Risk Level	[Combine likelihood and consequence to assess the risk as Low, Medium, or High]
Risk Mitigation Measures	
Design Changes	[Adjustments to eliminate or reduce risks]
Warnings and Labelling	[linstructions and warnings on the product to eliminate or reduce risks]
Reference to the relevant standards used or references to the other technical specification in relation to which conformity is declared:	
Applied standards	[List the relevant standards or technical specifications used to declare conformity]
In addition to the above:	
Additional information	[Insert any additional relevant information]
Other relevant legislation	| [List other applicable legislation]
Signature:	
_____ Name Title	Place and date

Guidance for Completing the Risk Analysis Template (GPSR Compliance)

When conducting a risk analysis in accordance with Regulation (EU) 2023/988 (GPSR), the following aspects should be addressed:

1. **Risk Identification**
   Identify potential hazards associated with the product, including foreseeable misuse.

   Examples of risks could be:
   - Choking hazard: Small parts that may detach and pose a choking risk for children
   - Cutting hazard: sharp edges that can cause cuts
   - Collapse or structural failure: Products designed to support a person's weight may be unstable and collapse during use.
   - Incorrect labeling or instructions:
     Missing or incorrect information that can lead to improper use and increase risk of injury
   - Environmental or chemical risks: Products may contain substances that are harm ful during use of disposal

2. **Risk Analysis**
   Evaluate the likelihood and severity of each identified risk as part of your risk analysis.

   a) Assess Likelihood
   Estimate how likely it is that the risk will occur:
   - Low
   - Medium
   - High

   b) Assess Severity
   Estimate how serious the consequences would be if the risk occurs:
   - Low
   - Medium
   - High

   c) Determine the Risk Level
   Use the table on the following page to determine the overall risk level by cross-referencing likelihood and severity.

3. **Risk Mitigation Measures**
   Consider and document measures to eliminate or minimize risks identified in the risk analysis.

Severity/ Likelihood	Low	Medium	High
Low	Low risk level	Low risk level	Medium risk level
Medium	Low risk level	Medium risk level	High risk level
High	Medium risk level	High risk level	High risk level

Color Legend:

- Low Risk – Acceptable, requires minimal follow-up.
- Medium Risk – Should be assessed and managed.
- High Risk – Requires immediate action and follow-up.

Actions Based on Risk Level in the Risk Analysis

Low Risk Level
- The risk is acceptable; no immediate action is required.
- Continue to monitor and document the risk analysis for future reference.

Medium Risk Level
- The risk may have consequences if not managed.
- Identify and implement preventive measures to reduce the risk.
- Reassess and document any actions taken in the risk analysis.

High Risk Level
- The risk is unacceptable and requires immediate corrective action.
- Implement measures to eliminate or minimize the risk.
- Verify the effectiveness of these measures and reassess the risk analysis.
- Ensure the product is safe for consumer use and document all actions in the risk analysis.

Risk analysis is an ongoing process. It must be reviewed and updated regularly, especially if there are changes to the product or new information about hazards becomes available.

Further Information

For more details on risk analysis requirements, refer to:
- Regulation (EU) 2023/988 on General Product Safety
- The European Commission's Guide (EU) 2019/417
- ISO 10377

Appendix V

Questionary - guideline for marketing batteries

EU POP Regulation (EU 2019/1021) and Amendments
EU POP Regulation (Regulation (EU) 2019/1021) and Amendments: Are the battery/batteries assessed to be compliant to the EU POP Regulation (Regulation (EU) 2019/1021) and any relevant amendments restricting the production and use of persistent organic pollutants?
Battery Directive 2006/66/EC and Amendment 2013/56 EU
Does the battery/batteries comply with the marking requirements and substance restriction limits set forth in the EU Battery Directive 2006/66 and Amendment 2013/56 EU ? Notice: The battery directive will be repealed with effect on 18 August 2025 by EU New Battery Regulation 2023/1542. Article 95 lists provision for this repeal, which includes information on articles that will keep applying for a longer time
Can you provide Test Reports of the battery/batteries according to EU 2006/66, amendment 2013/56 EU for the battery article number?
Battery Regulation EU 2023/1542
Can you provide a Declaration of Conformity (DoC) ? According to EU Regulations relevant for the battery/batteries
Can you provide Test Reports of the battery/batteries according to EU 2023/1542 for the battery article number ?
Does the battery/batteries comply with the marking requirements of 18. August 2024 set in the EU Battery Regulation EU 2023/1542 ?
- Including CE mark
Are you preparing all marking requirements which enter into force 18 August 2026 ? (Annex VI, part A+B + cap. III, Art.13)
Can you already provide information for the upcoming making requirements which enter into force 18 August 2026 ?
- information identifying the manufacturer in accordance with Article 38(7)
- the battery category and information identifying the battery in accordance with Article 38(6)
- the place of manufacture (geographical location of a battery manufacturing plant)
- the date of manufacture (month and year)
- the weight
- the capacity
- the chemistry
- the hazardous substances present in the battery, other than mercury, cadmium or lead
- usable extinguishing agent
- critical raw materials present in the battery in a concentration of more than 0,1 % weight by weight
- Symbol for separate collection of batteries
- not rechargeable (label requirement only for non-rechargeable batteries)
Working on the QR code (with link to a battery pass and EES) 18 February 2027 (Annex VI, part A+B+C + cap. III, Art.13)
Performance and durability requirements for rechargeable LMT batteries, requirements of 18. August 2024

Due Diligence EU 2023/1542
The regulation establishes comprehensive due diligence requirements for economic operators involved in the battery market, emphasizing risk management, transparency, and accountability in supply chain operations. Can you provide the necessary documentation pertaining to the due diligence requirements of regulation EU 2023/1542 (cf. art. 48, 49, & 50) on Aug. 18, 2025?:
- Due diligence policy
- Description *(trade name(s) and type(s))* and amount of mineral(s)
- Chain of Custody or Transparency system (incl. name and address of upstream suppliers to raw material
- Country of origin of the mineral(s), and documentation of the supply chain *(Upstream traceability to raw material extraction)*
- The volume of the mineral per battery type *(percentage and weight)*
- 3rd party verification reports confirming compliance
- If mineral(s) originate from high-risk areas, additional information must be available (mine of origin, consolidation, trade, processing location, taxes fees, and royalties paid (cf. article 49, 2(f))
- Grievance mechanism
- Annual reporting on the due diligence process
- Detailed information about environmental impact of the batteries
- Valid social audits for manufacturers located in high-risk countries
- Additional information
General Product Safety Regulation EU 2023/988
Can you provide the information required for marketing the battery/batteries on online marketplaces ?
Can you provide information required to a recall notice ?
Can you provide a risk assessment or material data safety sheet to the battery ?

Appendix VI

Substances of Very High Concern (list to be filled)

USE OF SVHC IN ARTICLES OR PACKAGING MATERIALS Even if the vendor assesses that exposure to health or the environment can be excluded under normal/foreseeable use, the use of Substances of Very High Concern (SVHC) must be disclosed. Please note that packaging is considered a separate article and must be evaluated independently.	
A. Does the article containing SVHC from the Candidate List issued by ECHA (European Chemicals Agency)?	No ☐ Yes ☐ above 0,1% (w/w) Comments:
B. Does the packaging containing SVHC? (Obligations are the same as for articles for any packaging (primary, secondary etc.).	No ☐ Yes ☐ above 0,1% (w/w) Comments:

If your answer is "yes" in part A, all SVHC in the article must be specified.

Chemical name/ INCI name	CAS No.	EC No.	In which part(s) are SVHC present?	Weight %	Weight of part in the article	State function (dye, pre-servative, softener etc.)

If your answer is "yes" in part B, all SVHC in the packing materials must be specified.

Chemical name/ INCI name	CAS No.	EC No.	In which part(s) are SVHC present?	Weight %	Weight of part in the article	State function (dye, pre-servative, softener etc.)

Information according to consumer about safe use on request [1]	
If any SVHC is present in the article or its packaging, the vendor assess whether safety information is required. If deemed necessary, the vendor must provide clear and adequate information to consumers to ensure the safe use. Is information to guide consumer about safe use necessary?	If yes, please state safety information: Examples could be: Contains substance X, which is harmful to environment or health. Keep out of reach of small children. Handle waste as hazardous waste. No ☐ Yes ☐
Registration and notifications on substances [2]	
Are the listed SVHC substances within the scope in Regulation (EC) No 1907/2006, Article 7 (3): "Exposure (health/environment) can be excluded during normal or reasonable foreseeable conditions of use"?	No ☐ Yes ☐ If yes, on request documentation for "no exposure" must always be completed and forwarded.

VENDOR'S SIGNATURE
The undersigned vendor to Salling Group guarantees that the information given in this Declaration is correct. Changes in the product data given in the Declaration must be agreed and approved by Salling Group in advance, and a new Declaration (included new documentation if possible) must then be completed and forwarded. Salling Group reserves the right to use the information in this Declaration as a basis for documentation towards the authorities, for product labelling, for consumers requirements according to article 33 and to demand further documentation. The undersigned vendor to Salling Group accepts this.
Vendor's full formal name: _____ REACH contact person: _____ E-mail of contact person: _____ Phone of contact person: _____ Signature: _____ _____ Date:_____

1) Regulation (EC) No 1907/2006, Article 33 (2)
2) Regulation (EC) No 1907/2006, Article 7 (3)