PRIVATE LABEL FROM ZERO

REACH Self-Check Checklist

For first-time importers of physical products into the EU

REACH (Regulation (EC) 1907/2006) governs the chemicals in your product. The obligations themselves cost nothing - the information is public and free. Testing costs money, but far less than most people assume. The cost that actually hurts is weeks, so put testing on your timeline next to tooling and samples.

KNOW WHAT YOU'RE ACTUALLY SELLING

- [ ] **1. List your materials - every component, by material and by weight**
  You cannot assess a product you have not broken down. This step is unglamorous and it is the one people skip.
- [ ] **2. Look up which restricted chemicals apply to your materials**
  Annex XVII of REACH is a public EU list of chemicals that are banned or capped in specific products. You do not read the whole list - you take each material from step 1 and look up what is restricted for it. Soft plastic points to phthalates. Textiles to azo dyes. Metal in skin contact to nickel release. Coatings and pigments to heavy metals such as lead and cadmium. Search ECHA's website for 'Annex XVII' plus your material, and note the substance and the limit - that is what you will ask the supplier to test against in step 3.

INTERROGATE WHAT THE SUPPLIER GIVES YOU

- [ ] **3. Ask for test reports covering your exact model and material**
  Dated within twelve months, from an accredited laboratory. Not a generic factory document.
- [ ] **4. Read the scope before you trust the report**
  Which substances, which model, which date, which lab. If the scope does not cover your question, the report is decoration. There is no such thing as a 'REACH certificate' for a finished product.

VERIFY WHAT MATTERS

- [ ] **5. Commission your own test for anything that matters**
  Accredited commercial lab, or your country's national public health institute - the route most people do not know exists. Expect roughly a one-month turnaround.
- [ ] **6. Get the certificate in your company's name, not the factory's**
  This makes it usable in your own marketing and portable if you change supplier. Pricing is quoted per testing batch, so testing several products or variants together lowers the cost per product.
- [ ] **7. Check whether any component exceeds 0.1% SVHC**
  If it does: supply-chain communication, the 45-day consumer response obligation, and SCIP notification.
- [ ] **8. Re-check the Candidate List at least once a year**
  It grows. What was compliant last year may not be this year.

Not sure which rules apply to your product?

Work through the free Import Compliance Navigator at privatelabelzero.com/tools/import-compliance/ - seven questions, then a checklist built for your specific product and market. The full compliance module, with templates and factory scripts, is part of Private Label from Zero. Join the waitlist at privatelabelzero.com

Scan to open the tool

This checklist is general information based on the author's professional experience, not legal advice. Regulations change and your obligations depend on your product, materials and role in the supply chain. Verify against the current text of Regulation (EC) 1907/2006 and the ECHA Candidate List.