

Basic Information

Valves

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The new EU product law

Impact on Building valves I Sanitary products

Assistance

1. Background

The new EU Product Safety Regulation (GPSR) has been in force for all consumer products since December 13, 2024. This has implications not only for retailers and importers, but also for manufacturers of building valves and sanitary products. Since then, they have repeatedly asked themselves whether they are affected.

2. Key criterion: consumer product

Definition of "consumer product" according to Article 3 No. 1 of the EU Product Safety Regulation:

“‘Product’ means any item, whether or not it is interconnected to other items, supplied or made available, whether for consideration or not, including in the context of providing a service, which is intended for consumers or is likely, under reasonably foreseeable conditions, to be used by consumers even if not intended for them”

Key question for manufacturers: Is my product a consumer product?

The following are not consumer products:

- B2B products that are neither intended nor foreseeably used/operated by consumers
- Stand-alone software (*according to the European Commission's FAQ, however, this is again disputed; correctly, however, it is not an item within the meaning of Art. 3 No. 1 GPSR*)

In case of doubt regarding B2C products:

To answer this question, it is important to clarify the following:

Does the consumer have direct contact with the product, for example, the faucet? "Direct" means that, for example, a faucet can be turned on or off, thereby directly influencing the flow of water.

Answer NO:

- Product/faucet is not affected by EU product law (GPSR)

Answer YES:

- Product/valve is affected by EU product law (GPSR)

3. Specific products affected

Products where it can be assumed that the consumer has no direct contact with or influence on them and which are therefore not affected by EU product law:

- Products (e.g., technical building valves) that are installed behind the wall and cannot be directly influenced by the consumer, e.g.,
 - Pipes
 - Installation elements or mounting elements for washbasins, bidets, urinals, or fittings,
 - Hygiene flushing and leak protection systems, if these are only used in commercial areas (schools or administrative buildings),
 - Laboratory valves in the professional sector

Products where it can be assumed that the consumer has direct influence or contact with them and which are therefore subject to EU product law, for example:

- Kitchen and bathroom faucets | Single-lever mixers
- Shower and bathtub valves | Bathtubs with controls
- Radiator thermostatic valves
- Shut-off, safety, and (line) control valves with the option of manual opening/closing

4. Testing for applicability – checklist

Check Question: Is this a consumer product?

1. Where is the product/fitting installed?
 - Behind the wall, without the possibility of direct contact
 - In front of the wall, with the possibility of direct contact
2. Is there the possibility of direct influence on the valve, e.g., manual
 - opening and closing
 - control of water flow | heat
 - Regulating, e.g., setting temperatures

When assessing whether a product is affected, the question of how and from whom the product/valve is purchased and who installs it is irrelevant. In the case of distribution via wholesalers and installation by a professional installer (without the involvement of the consumer), it cannot therefore be automatically assumed that this is not a consumer product. Instead, the key criterion to consider is the extent to which the consumer has direct contact with the product and can operate it themselves (see above).

Conversely, however, the use of traditional B2C distribution channels (such as DIY stores) is always a (strong) argument for classifying a product as a consumer product (within the meaning of the GPSR).

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Note:

This document serves as a guide or aid for assessing whether a product is affected by the GPSR and for determining whether a given product is a "consumer product." The information is non-binding and does not replace a legal assessment. The manufacturer is responsible for assessing its own product.