Small Presses and New EU Acts

Don't Panic - Some Pointers

What's this document about?

This is a very quick distillation of our understanding of the **main points and implications of new EU guidance and law** that will affect presses trading across borders. **We are not lawyers** – so please do your own research too, but this is aims to be a quick overview with resources, and **a call not to panic**, based on interpretations by presses in the Indie Press Network and by the Publishers Association and the IPG (no endorsement has been sought).

What are the new EU acts that everyone is worrying about?

- VAT/IOSS (Import One Stop Shop) now in place.
- GPSR (General Product Safety Regulation) now in place. Gov.uk information here.
- EUDR (EU Deforestation Regulation) in place for 'large companies' 30/12/25, 'micro and small companies' (fewer than 50 employees and a turnover or balance sheet total of up to €10 million) 30/06/2026. EU Commission information here. (Update (26/9/25): this one was deferred from December 2024 to 2025, and it's now looking quite possible that it will be deferred again. Shall update this when there's more information!)

We're not in the EU – does this apply to us?

In short, yes – because Northern Ireland is included in much of the new legislation; and because retailers like Waterstones are requiring presses to be compliant. But don't panic – it's not as scary as it sounds…

VAT/IOSS

This was the first to come in, when the Brexit agreements came into play. In short, as importers to the EU, publishers must collect and pay VAT for books in the territories they sell to, and then pay it to the relevant authority. Surely no one can be expected to submit VAT returns for every EU country, so the EU came up with the cheerily named Import One Stop Shop – so you pay one VAT return. The catch is you need to be an EU-based individual. If you have a philanthropic aunt in Madrid, maybe she will be happy to be the named individual; if not, you'll likely need a third party. Options range from Royal Mail (Delivered Duty Paid, pay as you go) to Deloitte's

£2000+ option. Renard uses <u>EAS Project</u> – no affiliation but happy customer. To set up was free – they installed a plugin on our Wordpress website which calculates taxes at the correct rate; they set us up as digital residents of Estonia (DIY option could be possible); when someone orders from, say, Finland, the plugin calculates the tax and adds it to the order, then declares it to EAS who send us an invoice at the end of the month and file the VAT return on our behalf. This feeds through to Royal Mail Click and Drop and labels bear an IOSS symbol, indicating to customs that duty has been paid. We're on a pay as you go legacy model which costs ~€1/2 a month, but the new offerings are still cheap.

NB Presses can choose not to act, and opt to send parcels Delivered Duty Unpaid – this means tax has not been paid, so customers will receive a bill from customs, likely with an extra admin charge in the region of €5–10. So long as you warn customers this is a valid approach, but many presses operating this way have spoken of high volumes of returns.

GPSR

This has caused the most recent stir – the idea is the EU thinks (rightly, of course) consumers should be able to ask a company if their product might explode, or cause illness. Books for some reason, despite being an ancient invention, are not exempt, nor are digital products, so ebooks are included.

What do you need to do? You can read all the guidance in full, sit in on a million webinars and still be a bit at sea; the salient points are, like in the IOSS step, you need an EU-based address, and this should be 'on your product' (specifically on it rather than on the packaging) – best practice guidelines say something like the following (again, I don't have a friendly Italian cousin, so we pay a small fee to <u>EAS</u> to be our 'authorised representative' – there are myriad other options available) on your copyright page:

EU Authorised Representative: Easy Access System Europe – Mustamäe tee 50, 10621 Tallinn, Estonia, gpsr.reguests@easproject.com.

You should also make it clear on your website that your books are GPSR compliant – our advice was to add a 'EU Safety Information/EU Authorised Representative Information here' link to book pages on our website, in case a bored customs agent went looking – see for instance here.

The Publishers Association and the printer CPI have been great sources of information on this front – see for example this CPI webinar. Bear in mind most of those presenting on GPSR are speaking to huge companies; it is unlikely 'small and micro entities' need to prepare huge risk assessments, and common sense must surely come into play – will a book cause a paper cut? Well, sure, because it's paper... but we mitigate this by gluing it in to the spine. If you are worried, you can likely find a ready-made risk assessment you just need to download and have on file, possibly accessible via your website.

The most important thing, we understand, is to demonstrate you're taking it seriously and trying to comply. Customs officers don't have enough time on their hands to be checking every single copyright page passing under their nose, and surely folks know what risks are involved in buying a book, but it's best to be pottering in the direction of compliance as soon as you can, more as a 'just in case'.

NB Ingram have confirmed that if your press solely prints and supplies books via them, they will be your GPSR contact.

EUDR

This one is yet to come – it was due to come into force in December 2024, but the European Commission realised they weren't as prepared as they needed to be. (Update (26/9/25): it's looking quite possible that it will be deferred again. More information as it happens!) In short, again, this is born of an important issue: let's make sure no illegally logged products or products supporting climate change come into the EU, because the planet (whatever my neighbour tries to convince me) is having a hard time, and needs the trees looking after. Again, this includes books.

Again, CPI have been brilliant on trying to understand this – <u>here</u>'s a webinar they ran in July 2024, and do get in touch with <u>Lisa Faratro</u>, Director of Environment and Sustainability, if you want to be on her newsletter.

The wording is slightly complicated on this one, and not everyone agrees on interpretation; but most agree UK publishers will be the 'operator', i.e. the party responsible. The onus, therefore, is on us to – and don't pre-emptively panic here, because this sounds scary, but isn't, really – know what species tree has been used for each print run, and to know triangulating coordinates of where it was cut down from. This information needs to pass from the logging company (often the same company as the mill) to the printer, to the European Commission, back to us, in the form of a Due Diligence Statement, which we will add to our ONIX feed (or Nielsen's Title Editor – NB Wild Hunt Books contacted Nielsen in July 2025 to ask for an update; the fields are not yet rolled out but no doubt will be soon; EDItEUR have prepared ONIX guidance here).

At this point, it's sounding a bit scary – but bear in mind that your books are almost certainly compliant. Unless you're printing with a shady company that's logging in the Amazon – highly unlikely, nigh on impossible if you're with a reputable UK printer, which I'd really recommend for sustainability reasons anyway – the trees cut down to grow your books are almost certainly from a well-managed FSC-certified forest in Scandinavia. It could be even better – if you're using Holmen paper, say, the mill owns the forest, and for each tree they cut down they replant at least two saplings. Huzzah!

You can now sign up to the EU portal for declaring statements, if you want to start testing things out and want to go the DIY route; if, like us, you're thinking this sounds a logistical headache you could do without, there are a few options.

First, I'm certain companies with technical know-how are currently working out how to be the middle man. Our pals at EAS are trailing a solution, which I have yet to explore. So this is one bit of light at the end of the tunnel – more money, yes, but if we're going to start collecting this data going ahead, as a part of production workflows, it's then in theory not too much of an extra headache. Some printers may offer to do the hard work for you – CPI, for instance, have sent over some early details on this (I haven't seen pricing).

There are some get-out-of-jail-free cards too – if you print on 100% recycled products, no trees are felled, so your products will be exempt. (Before you immediately switch paper, bear in mind that recycled papers can have a higher footprint, and can yellow quicker than virgin woodfree bookwoves. Speak to your print supplier(s) to explore options.)

Likewise, if you're using on-demand printing, the onus is too high to expect you to deal with this; so Ingram and co will do the work for you.

The takeaway

Please get in touch with updates/questions as it will help to improve this document. There's strength in working together! And do join the IPG/PA/Indie Press Net so we can support one another in turbulent times.