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project 2023

Contents

Summary	3
1. Background	5
1.1 The Nordic Enforcement Group	5
1.2 Enforcement of e-commerce	5
1.3 Objectives of the project	6
2. Method	7
2.1 Chemical legislations in scope	7
2.2 Other relevant legislations	8
2.3 Relevant e-commerce actors and responsibility	10
2.4 Selection of companies, products and substances	12
2.5 Communication between member states	13
3. Results	15
3.1 Non-compliant products	15
3.2 Restricted substances and materials	18
3.3 Enforcement measures	19
4. Discussion	20
4.1 Dropshipping stores have the highest non-compliance rate	20
4.2 More non-compliant products from non-EU countries	21
References	22
Appendix I: Definitions in this project	23
Appendix II: Product types	25
About this publication	26

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Summary

The e-commerce is continuously growing and new ways to organise online trade has evolved. The enforcement authorities must keep pace with this development and continue to include control and monitoring of e-commerce as part of their enforcement activities.

This project was a joint enforcement project for the market surveillance authorities within the Nordic Enforcement Group. The goal was to check the compliance level of e-commerce in the Nordic countries as well as collecting best practices to enhance our work regarding enforcement of e-commerce of consumer goods. We focused on three types of business models: marketplaces, dropshipping stores and web shops. The products were bought from companies located nationally, in other EU member states and in countries outside the EU/EEA. A total of 412 products were checked for substances regulated in the REACH regulation, the RoHS directive, the Toys directive or the POPs regulation.

The overall results showed that 152 (37%) of the products inspected were found to be non-compliant due to content of regulated substances above the restriction limit. When comparing the different types of e-commerce stores (marketplaces, dropshipping stores and web shops), the non-compliance rate was highest for the dropshipping stores, with a non-compliance rate as high as 70%. When a non-compliant product was found, the responsible actor for the product was contacted. Several of the dropshipping stores did not remove the non-compliant products even though they received notice to do so from the participating authorities.

The national enforcement authorities in this project consider dropshipping stores as responsible for the product safety of the products they are selling, either in the capacity of being importer or distributor. Dropshipping stores seem however to be unaware of their responsibility. This way of organising the trade needs to be explored further by the authorities. The Nordic enforcement group will look specifically into this issue in more detail in an upcoming project next year.

The results in this project confirm that products bought from outside the EU has a higher risk of non-compliance, as compared with the products bought from within the EU. The non-compliance rate for the non-EU companies was 66%. Products from non-EU countries which are sent directly to the consumers are difficult for the national authorities to control. The national authorities lack powers to demand correction from actors outside the EU. The marketplaces and dropshipping stores need to strengthen their proactive work. The national authorities need to explore further the possibility for enforcement within the new Market Surveillance

Regulation ((EU) 2019/1020) and also, future requirements in the Digital Services Act ((EU) 2022/2065) and in the General Product Safety Regulation ((EU) 2023/988). These new regulations will hopefully put pressure on the actors and contribute to improved legal compliance.

1. Background

1.1 The Nordic Enforcement Group

The Nordic enforcement projects are run by the Nordic Enforcement Group, a subgroup of the Nordic Chemicals Group, under the Nordic Council of Ministers. The main purpose of the Nordic Enforcement Group is to exchange experience on control and enforcement of the European chemical legislations and to prepare and carry out common enforcement projects.

This project was launched early 2022 and was finalized in July 2023. The main responsibility for the project was allocated to the Norwegian Environment Agency and the project leaders were Loella Bakka and Ingvild Kvien. Participants from the other Nordic countries in the project group were Karin Rumar, Daniel Ahlström, Sofia Bejgarn, Amanda Rosen and Karina Zaluska from the Swedish Chemicals Agency (KEMI) and Markus Koponen and Helena Ritamäki from the Finnish Safety and Chemicals Agency (Tukes).

1.2 Enforcement of e-commerce

The e-commerce is continuously growing. According to a report by the trade association E-commerce Europe, it is expected that online sales will account for an average of 30% of the European retail turnover by 2030 (E-commerce Europe, 2022). In the Nordic countries, 87%^[1] of the internet users bought goods or services online in 2022, which is the highest share in Europe.

The enforcement authorities must keep pace with this development and continue to include control and monitoring of e-commerce as part of their enforcement activity. New IT-tools and programmes are developed, which can facilitate the monitoring and enforcement activities of surveillance authorities. One of the major challenges for the enforcement authorities is that companies can trade in a country without being within the jurisdiction of the national enforcement authorities. The companies can be located outside the EU/EEA or in another EU/EEA-countries. The latest requires a close cooperation between the national authorities.

In 2020 the Nordic enforcement group published the report "Nordic project on enforcement of internet trade" (Nordic Council of Ministers, 2020). The work from 2020 is continued in the current enforcement project. Since then, the number of

1. Calculated from graphics regarding Finland, Denmark, Iceland, Sweden and Norway in the EUROPEAN E-COMMERCE REPORT 2022

e-commerce actors are continuously growing and new ways to organise the trade has grown in importance (platforms, dropshipping, chatGPT^[2] etc.). Dropshipping is a rapidly increasing business model and is presented as a low-risk and easy way to start a business^[3]. This model, which was not part of the previous Nordic joint enforcement project, had a special attention in this project and in this report.

New EU legislations like the Digital Service Act ((EU) 2022/2065), the Market Surveillance Regulation (EU (2019/1020)) and the General Product Safety Regulation ((EU) 2323/988) give new provisions for the e-commerce actors and is looked into in this project.

1.3 Objectives of the project

The goal of this project was to do a check of the compliance level of e-commerce, explore and collect best practices of each country to enhance our work regarding enforcement of e-commerce of consumer goods and get a closer cooperation between the Nordic market surveillance authorities. We gathered experience on enforcement of different types of actors, explored the new legal framework as well as shared enforcement experiences, including the use of different IT-tools and enforcement strategies.

2. Ecommerce news: <https://ecommercenews.eu/zalando-launches-ai-fashion-assistant/>
3. <https://www.shopify.com>

2. Method

2.1 Chemical legislations in scope

2.1.1 Reach regulation ((EC) No 1907/2006)

The REACH regulation stands for Registration, Evaluation, Authorization and Restriction of Chemicals. The REACH regulation covers requirements for chemical products and articles. Annex XVII of the REACH regulation sets out restrictions for certain substances. There are also rules restricting certain uses of substances posing an unacceptable risk.

2.1.2 POPs regulation ((EU) No 2019/1021)

The Regulation on Persistent Organic Pollutants (POPs^[4]) prohibits the placing on the market and use of several substances that are persistent and that can harm the environment and humans at low concentrations. Examples of regulated substances are short-chain chlorinated paraffins (SCCP) in plastic products and PFOA in different materials.

2.1.3 RoHS directive (2011/65/EU)

RoHS stands for Restriction of the use of certain hazardous substances in electrical and electronic equipment. The RoHS directive is a product-specific directive for electrical and electronic equipment that restricts the use of certain metals, flame retardants and phthalates. Among other things, the directive requires products to be labelled. The CE mark indicates that the manufacturer certifies that the requirements of specific EU legislation are met, and the contact details indicates which companies are responsible for the product.

2.1.4 Toy Safety Directive (2009/48/EC)

The EU Toy Safety Directive contains several requirements for the chemical content of toys. Among other things, there are limit values for how much certain metals may leak out, restrictions on the content of CMR substances (substances that can cause cancer, genetic mutations or damages to the reproductive system) and perfume substances. As in the RoHS Directive, the Toy Safety Directive contains labelling requirements.

4. Regulation (EU) 2019/1021 of the European Parliament and of the Council on persistent organic pollutants.

2.2 Other relevant legislations

In addition to chemical legislations, there are other EU-wide legislations that are relevant to e-commerce. These are general rules for e-commerce and rules for the control of trade.

2.2.1 E-Commerce Directive (2000/31/EC)

E-commerce in the EU is regulated, among others, by the so-called e-Commerce Directive^[5], which came into force in July 2000. The e-Commerce Directive lays down certain obligations for information society service providers (e.g., intermediary marketplaces) established in the EEA (member states of the European Economic Area). Among other things, there are requirements for marketplaces to provide certain information, such as the name, place of establishment and e-mail address of the marketplace (Article 5). The directive has limited the liability of marketplaces. The basic idea is that marketplaces that only serve as an intermediary in sales should not have any proactive responsibility for products sold. However, they must remove offers for sale when illegal content is discovered, and thus they have a reactive responsibility (article 14).

The directive will be replaced in February 2024 by the Digital Services Act ((EU) 2022/2065). More responsibility will be placed on marketplaces, including requirements that it should be clear who the responsible economic operator is for each product (article 31). It will also be mandatory for marketplaces to give a single point of contact to enable communication with the market surveillance authorities, among others (article 11).

2.2.2 Market Surveillance Regulation (EU) 2019/1020

The Market Surveillance Regulation (EU) 2019/1020 gives harmonised rules on market surveillance^[6]. The regulation addresses problems with e-commerce and introduces new provisions on measures concerning e-commerce. At the time being, the regulation is under implementation in Norway.

5. Directive 2000/31/EC on certain legal aspects of information society services, in particular electronic commerce, in the Internal Market (Directive on electronic commerce) [EUR-Lex - 32000L0031 - EN - EUR-Lex \(europa.eu\)](#)

6. Regulation (EU) 2019/1020 of the European Parliament and of the Council of 20 June 2019 on market surveillance and compliance of products and amending Directive 2004/42/EC and Regulations (EC) No 765/2008 and (EU) No 305/2011.

Placing on the market (article 6)

Article 6 in the Market Surveillance Regulation ((EU) 2019/1020), states:

"Products offered for sale online or through other means of distance sales shall be deemed to be made available on the market if the offer is targeted at end users in the Union [...]" In the introduction to the market surveillance regulation, it is stated (in section 15): For the case-by-case analyses, relevant factors, such as the geographical areas to which dispatch is possible, the languages available, used for the offer or for ordering, or means of payment, need to be taken into consideration. In the case of online sales, the mere fact that the economic operators' or the intermediaries' website is accessible in the Member State in which the end user is established or domiciled is insufficient".

Responsible economic operator (article 4)

The requirement that, in certain cases, products may not be placed on the market without the existence of a responsible economic operator established in the Union (article 4) is new in the market surveillance regulation. However, this new requirement only applies to products covered by RoHS and the Toy Safety Directive. The requirement does not apply to other chemical legislations such as the REACH, CLP and POPs. If there are no other responsible economic operators (manufacturer, importer or authorised representative), a *fulfilment service provider* will be the responsible economic operator. This is a new role, and it is defined in Article 3(11):

any natural or legal person who, in the course of a commercial activity, offers at least two of the services of storage, packaging, addressing and dispatch, without having ownership rights in the articles concerned

Marketplaces can have several different roles. In cases where they only display products for the sellers, they are not covered by the new provision. If, on the other hand, they take greater responsibility for the products as defined above, they become the responsible economic operator. The European Commission has issued a Notice of Guidelines on Article 4 (EUROPEAN COMMISSION, 2021).

Powers of market surveillance authorities (article 14)

The market surveillance regulation also gives the authorities the possibility to restrict access to a web page if no other effective means are available to eliminate a serious risk from a product (article 14).

2.2.3 The General Product Safety Regulation (EU) 2023/988

The General Product Safety Regulation (GPSR)^[7] will from 13 December 2024 replace the current General Product Safety Directive and the Food Imitating Product Directive^[8]. It addresses the new challenges posed by the growth of online sales and in particular via online marketplaces.

2.3 Relevant e-commerce actors and responsibility

In this chapter, we are looking at the different e-commerce actors in light of their legal liability for the products they are selling. The following is based on the explanations in the report "Enforcement of e-commerce articles 2022" by KEMI (Swedish Chemicals Agency, 2023) and can be found in more detail there.

For the market surveillance authorities, it is crucial for the assessment of legal liability for a product to determine who owns the product and who does the buyer enter a purchase agreement with. This can often be challenging to determine, since there are several different business models and often limited information on contact details and company information given on the websites. In the different legislations, there are different obligations based on the role of the companies, and therefore important for the enforcement authorities to get this information.

2.3.1 Classic supply chain (web shops)

In the classic linear supply chain, ownership of a product passes from one actor to another in a chain. If such a company buys and sells online, we call them web shops as opposed to marketplaces and dropshipping stores. Ownership of the products (purchase and delivery) is transferred at each stage.

2.3.2 Marketplace

The marketplace provides a platform and, for example, payment solutions (mediate), while the seller in the marketplace is the one who sells the product to the buyer (consumer). Generally, the marketplaces have no responsibility in terms of, for example, product safety for the products. Product safety lies with each individual seller, who also sets the prices.

7. Regulation (EU) 2023/988 of the European parliament and of the council of 10 May 2023 on general product safety [..]: <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32023R0988>
8. https://commission.europa.eu/business-economy-euro/product-safety-and-requirements/product-safety/general-product-safety-regulation_en

2.3.3 Dropshipping store

The verb "to drop-ship" is not new in the retail world and is explained by most dictionaries as "provide (goods) by direct delivery from the manufacturer to the retailer or customer". Yet there seems to be a relatively new form of dropshipping operating in the e-commerce market, in the way of a dropshipping store. The term dropshipping store has no legal definition but usually refers to an e-commerce store selling products without having its own inventory. From here, the consumer orders a product, which the dropshipping store in turn orders in the consumer's name from the dropshipping supplier (this can be done automatically). The product is then sent directly from the dropshipping supplier to the consumer. Often the dropshipping stores focus on certain trendy products in few copies and the stores are quick to open and close. The same products are usually also available for sale at the marketplaces.

These stores are set up so that it looks like the dropshipping store sells their own products. The steps after are usually hidden from the consumer. The customer perceives that the products are the dropshipping store's "own" because information about the real seller is missing. The store controls promotions and is in charge of the customer service. Prices are determined by the dropshipping store, unlike the marketplace where the seller sets the price. Based on this, we consider that the dropshipping store is a responsible economic operator, and hence, responsible for product safety, and will be regarded as an importer or distributor, in line with other responsible economic operators within the EU/EEA.

2.3.4 Dropshipping suppliers

When a dropshipping store is establishing, it needs to be filled with products. Usually this is done through a dropshipping supplier. Here, the dropshipping store gets access to different suppliers against payment and can choose which products they want to offer in their store, without having to seek out suppliers and negotiate prices, supplier terms, shipping, etc. They can also quickly exchange the products available in the dropshipping store.

With the increase of dropshipping stores, many traditional marketplaces now also operate as a dropshipping supplier, like for example Oberlo, SaleHOO, AliExpress (Alidropship), Droschi, Printful, BigBuy, DHGate, and Yakkofu.

2.4 Selection of companies, products and substances

Selection of companies

The scope of the project was to inspect products sold from e-commerce companies. We chose to focus on the three types of business models; web shops, marketplaces and dropshipping stores, which were explained in section 2.3.

The geographical location of companies was of specific interest in this project. It was decided that the participating countries would inspect products sold from companies located in their own country, in other EU member states and from outside the EU.

Due to lack of information on the web sites, it was not always easy to know the business model of the e-commerce actor and where it was located before the product was purchased.

Selection of products

Each country decided which products to buy and analyse. The strategy for selecting products differed between the countries and between each national sub-project chosen to be a part of this joint project. Most of the products were chosen based on experience on where we often see deficiencies, such as short-chain chlorinated paraffins (SCCPs) and phthalates in soft plastic, and lead and cadmium in electronic devices. But also, some of the sub-projects included control of more recent restrictions, such as CMR-substances in textiles, tattoo-inks and PFOA and its precursors in textiles. In this project, the products were categorised in the following groups:

- Toy
- Electrical product
- Electrical toy
- Sports and leisure
- Jewellery
- Clothes, shoes and accessories
- Chemicals
- Interior articles
- Childcare article

In [appendix II](#), there is an overview with examples of products in each category.

Selection of substances

The products were sent to external laboratories and analysed for restricted substances. We checked compliance with the substances that are restricted in the REACH regulation, the RoHS directive, the Toys directive and the POPs regulation. The substances tested for are shown in table 1. In total, 412 products were analysed.

Table 1. Substances analysed for in different legislations.

Legislation	Substances
REACH annex 17	Phthalates, PAHs, azocolorants, CMR in textiles (post 72), CMR in tattoo inks (post 75), lead, cadmium and nickel.
POPs	Short chain chlorinated paraffins (SCCPs), PFOA and its precursors
Toys directive	Nitrosamines and heavy metals
RoHS directive	Phthalates and heavy metals

2.5 Communication between member states

The enforcement authorities use the database ICSMS^[9] to communicate with other member states and to the public information about non-compliant products. If a company located in a European country is not taking appropriate measures, the enforcement authority having found out about non-compliant products can use a function in the ICSMS-system (baton) to hand over the case to the responsible authority in the member state where the company is located. This function was used in four cases to pass the responsibility for enforcement to another member state due to lack of response from the company.

If the non-compliance is considered serious risk for human health and the environment, the product is also reported to Safety Gate^[10], which obliges the enforcement authorities throughout EEA to check if the product is available on their market and remove it. Products reported to the system are published to the public every week by the European Commission.

9. The Information and Communication System on Market Surveillance (ICSMS) is an IT platform to facilitate communication between market surveillance bodies in EU and EFTA countries: [Information and Communication System on Market Surveillance \(europa.eu\)](https://ec.europa.eu/information-communication-system-on-market-surveillance/)

10. Safety Gate: the EU rapid alert system for dangerous non-food products: <https://ec.europa.eu/safety-gate-alerts/screen/webReport>

To communicate non-compliant products to the public, there are also different national solutions. In Finland and Norway, products with serious risk are published on <https://vaarallisetuotteet.fi/etusivu> and <https://farligeprodukter.no/> respectively, which are webpages operated by several agencies to communicate to the public. All three countries also publish the tested products in their national market surveillance reports.

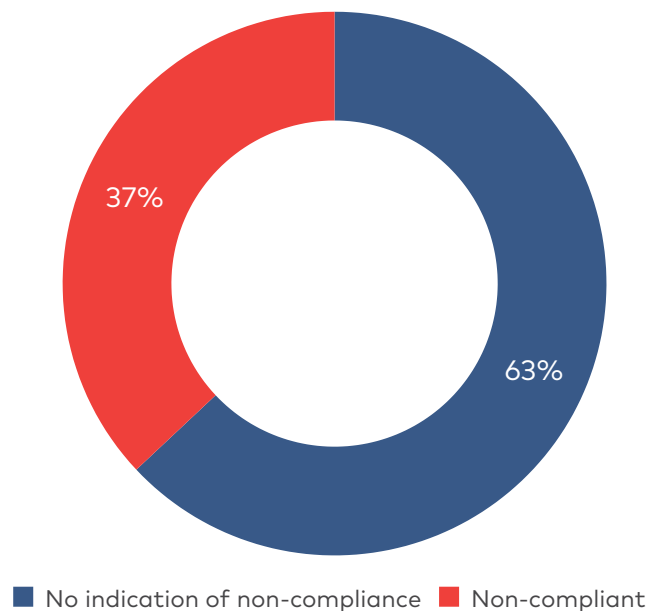
3. Results

In this chapter, the results from the non-compliant products are given. The non-compliance rate between the different product categories, between the types of e-commerce actors and between the location of the responsible actors is explored.

3.1 Non-compliant products

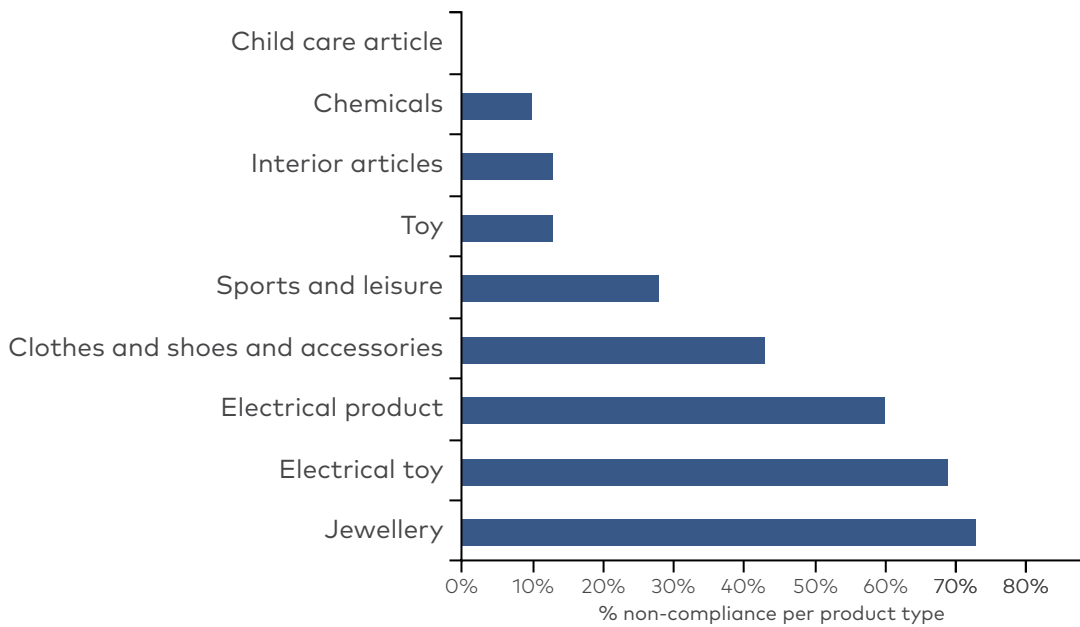
In this project a total of 412 products were checked for regulated substances. The products were bought from 146 different actors, distributed between marketplaces (17), dropshipping stores (37) and web shops (92). The overall results when it comes to compliance for all products reveals that 152 (37%) of the products inspected were found to be non-compliant, as shown in figure 1. All these non-compliances are related to products containing regulated substances above the restriction limit. The non-compliant products were bought in 74 different e-commerce stores.

Figure 1. Overview of compliance and non-compliance for all the products analysed in this project.



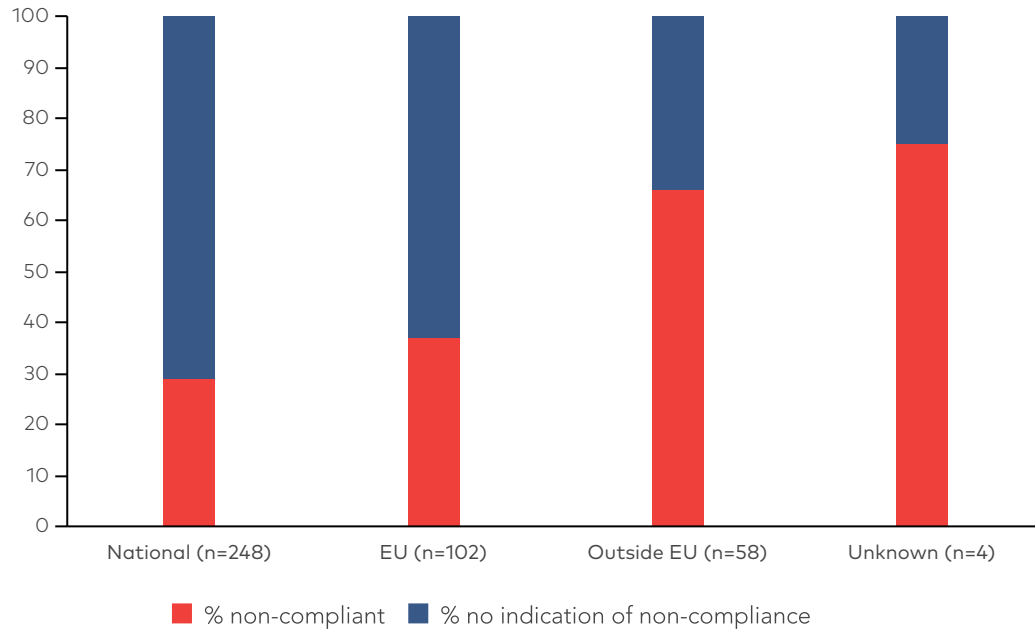
If we look closer at the non-compliances (figure 2), we see that jewellery has the highest rate of non-compliance (73%). Also, electrical products (60%) and especially electrical toys (69%) have a high rate of non-compliance. At the other end we find childcare articles (0%), chemicals (10%) and interior articles (13%).

Figure 2. Non-compliance rate for the different product types



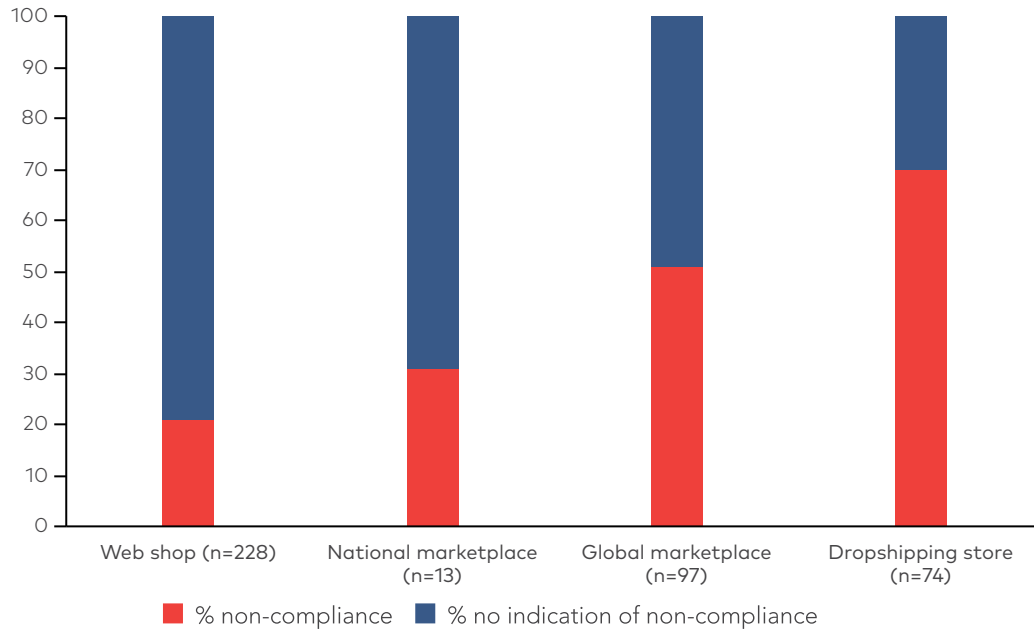
The result from the chemical analysis based on location of the companies is given in figure 3. 29% of the products bought from national companies were non-compliant. 37% of the products bought from EU based companies were non-compliant and 66% of the products bought from outside EU were non-compliant.

Figure 3. Overview of compliance and non-compliance per location of company (n= number of results).



In figure 4, an overview of the results per company type is shown. The results show that there is a non-compliance rate of 21% for the web shops, 31% for the national marketplaces, 51% for the global marketplaces and 70% for the dropshipping stores. There were 37 dropshipping stores in the project. 19 were located nationally, 15 within EU, 1 non-EU and 2 of unknown location.

Figure 4. Overview of compliance and non-compliance per company type (n= number of results).



3.2 Restricted substances and materials

In many cases, different materials in the same product were tested and each material was tested for several substances. For example, for an electrical product, both the soft plastic parts and also, the metal soldering point inside the product were tested. The restricted substances were predominantly found in metals and soft plastic. Lead, cadmium, phthalate (DEHP) and short chained chlorinated paraffins (SCCP) were the restricted substances most often found. The following substances were found above restriction limit in the project:

- **Lead:** in 85 of the products, predominantly in the soldering point of electronics
- **Boron:** in six slimes for children
- **Cadmium:** in 42 products: 22 jewellery, 14 electronics and 6 in PVC
- **Phthalates** (predominantly DEHP): in 54 products, mostly in PVC
- **SCCP:** in 38 products in PVC, mostly electronics (29)
- **PAHs:** in two tattoo inks
- **Formaldehyde:** in two fingerpaints

- **Nickel:** in two products: jewellery and PVC
- **Nitrosamines:** in five toys (rubber part)

3.3 Enforcement measures

Contact with e-commerce actors

When a non-compliant product was found, the responsible actor for the product was contacted. However, in five cases, we were not able to get in contact with the actor behind the dropshipping store.

Follow-up of non-compliance

The national authority notified the actors about the non-compliance in writing. Most of the actors voluntarily withdraw the product from the market. However, in 29 (19%) of the cases, the product was either never removed or it had reappeared when we controlled the webpage a month after the written notice. The 29 products were bought in 12 different stores. These were mainly global marketplaces (4) and dropshipping stores (7).

The policies and legislative possibilities for prosecution differ among the countries. The Swedish market surveillance authority reported 29 actors (44 products) to the prosecutor. The actors were almost all national based companies; dropshipping stores (16), web shops (12) and one national marketplace.

4. Discussion

The national authorities involved in this project had different focus areas for the products they included in the project. Many of the products are regarded "high-risk"-products, like cheap electronics and cheap soft plastic products. For other categories of products, there is less risk to find restricted substances above limit, such as in textiles from reputable stores. There are also differences in which substances that has been targeted. As we see from the results, lead, cadmium, phthalates and SCCP are the substances more often found above restriction limit, but in some of the sub-projects reported here, these substances were not tested for. This will influence the results and is important to bear in mind, when analysing the findings. Generally, it is also important to highlight that our selection of products is not randomly chosen, but based on a risk approach and the results regarding non-compliance will therefore not represent a general selection of all products available on the market.

4.1 Dropshipping stores have the highest non-compliance rate

When comparing the different types of e-commerce stores (marketplaces, dropshipping stores and web shops), the non-compliance rate was highest for the dropshipping stores, with a non-compliance rate as high as 70%. As shown under the results chapter, the dropshipping stores included in the project were mainly located in the EU. However, it seems that the products they sell, come from sellers outside the EU, often through marketplaces ("dropshipping suppliers"). The national authorities' impression is that the dropshipping stores believe that they are not responsible for the products they sell, and hence, also not for product safety. The majority of the actors not removing the products from the web page after written advice from the authorities, were dropshipping stores, which underlines this impression.

As explained in chapter 2 it is easy to set up a dropshipping store by using an e-commerce platform, and in many cases, it turned out that in some cases private individuals were behind the dropshipping stores. In other cases, it was not possible to find a responsible actor behind the websites at all. Some sites also disappeared/shut down by its own during the project. In this project, none of the authorities looked into the possibility of restricting access to the web page in accordance with article 14 in the market surveillance regulation ((EU) 2019/1020). Neither did we check the obligations to have an economic operator in the EU (article 4).

As highlighted in chapter 2.3.3, national enforcement authorities in this Nordic project, consider dropshipping store as the responsible economic operator, and therefore responsible for the product safety of the products they are selling either in their capacity of being importers or distributors. Dropshipping needs to be explored further by the authorities. The Nordic enforcement group will look specifically into this issue in more detail in an upcoming project next year.

4.2 More non-compliant products from non-EU countries

The results show clearly that products bought from outside the EU has a higher risk of non-compliance, as compared with the products bought from within the EU. The non-compliance rate for the non-EU companies was 66%. For EU-based companies, the non-compliance rate was 37%. This is comparable to the results in the Nordic e-commerce project in 2019/20 where the non-compliance rate was 78% and 32% for similar product categories for non-EU companies and EU-based companies, respectively (Nordic Council of Ministers, 2020).

Note that the dropshipping stores we included in this project are mainly situated in the EU, and the products bought from these stores are regarded as from within EU, although the products probably originate from non-EU sellers. Also, products bought from national marketplaces were accounted for as from within the EU, although the sellers may be from non-EU countries, and in this case, should have been regarded as non-EU products.

Products from non-EU countries which are directly sent to consumers are difficult for the national authorities to control. The national authorities have no jurisdiction against actors outside the EU. The marketplaces and dropshipping stores need to strengthen their proactive work.

The consumers need to be aware of these new developing business models and the risk they may pose to consumers. Consumers should take precautions in who they are buying from. In the report on this topic from KEMI, advice is given to companies and consumers (Swedish Chemicals Agency, 2023).

Market surveillance authorities need to explore further the possibility for enforcement within the new Market Surveillance Regulation and also, future requirements in the Digital Services Act and the General Product Safety Regulation. These new regulations will hopefully put pressure on the actors and contribute to improved legal compliance.

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Appendix I: Definitions in this project

Term	Explanation
Product	In this report, we use the word products as a collective term for all types of products investigated (chemical products and articles).
Article	The REACH definition of articles is: "an object which during production is given a special shape, surface or design which determines its function to a greater degree than does its chemical composition." Examples are dolls, clothes, electrical products, home styling products, sports equipment, bags, jewellery, gifts etc.
Chemical product	Chemical substances and mixtures for example tattoo ink.
National marketplace	<p>In this project a national marketplace is a marketplace with responsible economic operator in one of the Nordic countries.</p> <p>Examples are Fyndiq (Sweden), CDON (Sweden), Finn.no (Norway).</p>
Web shop	This is the traditional form of e-commerce. Unlike marketplaces and dropshipping stores, the company behind the online store owns the products that are sold. Most often they have their own inventory. In our report, we do not include marketplaces and dropshipping in the concept of web shops.
Non-compliance	Failure to comply with any requirement in legislation.
Withdrawal	Any measure aimed at preventing a product in the supply chain from being made available on the market.
Manufacturer	Any natural or legal person who manufactures a product or has a product designed or manufactured and markets that product under its name or trademark.
Importer	Any natural or legal person established within the Union who places a product from a third country on the Union market.
Distributor	Any natural or legal person in the supply chain, other than the manufacturer or the importer, who makes a product available on the market

End-user	Any natural or legal person residing or established in the Union, to whom a product has been made available either as a consumer outside of any trade, business, craft or profession or as a professional end user in the course of its industrial or professional activities.
Economic operator	The manufacturer, the authorized representative, the importer, the distributor, the fulfilment service provider or any other natural or legal person who is subject to obligations in relation to the manufacture of products, making them available on the market or putting them into service in accordance with the relevant Union harmonization legislation.
Responsible actor	Not a legal term. Used generally when an economic operator subject to obligations is not determined. It is used to refer to the company (or private person) behind the marketplaces, dropshipping stores and web shops.
ICSMS	The Information and Communication System on Market Surveillance (ICSMS) is an IT platform to facilitate communication between market surveillance bodies in EU and EFTA countries. It quickly and efficiently shares information on non-compliant products, avoids duplication of work and speeds up the removal of unsafe products from the market.

Appendix II: Product types

Product type	Examples of products in this project
Toy	Activity toys, Bath toys, Balloons, Fidget spinners, Finger paint, Costumes, Toy figure, Toy food, Dolls, Pen, Plastic toy, Putty, Puzzle mat, Rubber toy, Slime, Game, Squishy, Stretch toy, Inflatable toys, Water toys, Puzzles, Ttethers
Electrical product	3D pen, Lighting, Car, Portable vacuum cleaner, Wire, Camera, Camping shower, Charger, Drone, Headphones, Earphones, Electric tool, Epilator, Fan, Flashlight, Remote control, Magnifying glass, Gadgets, Gloves with lamps, Insect trap, Kitchen appliances, Watch, Lamp, Curling Iron, Head lamp, Personal protection, Power adapter, Decorative item, Radio, Sewing machine, Smart watch, Solar panel lamp, Speaker, Tablet, Tool, Washing machine, USB cable, USB charger, Vacuum cleaner, Skirt with LED-lightning
Electrical toy	Radio controlled car, flashing baby rattle, Activity toys with sound and light, Robots, Moving dolls
Sports and leisure	Grill cover, Gym band, Gym ball, Hammock, Massage ball, Mouse pad, Outdoor cushion, Outdoor heating pad, Parasol cover, Training equipment
Jewelry	Necklaces, Bracelets, Earrings
Clothes, shoes and accessories	Jacket, Jeans, Trousers, T-shirt, Shirt, Watch, Keyring, Rain poncho, Rubber boots, Sandal, Shoes, Slippers, Eyeglasses, Protective glasses, Sports glasses, Bags, Eye mask, Umbrella
Chemicals	Tattoo Ink, Micropigmentation ink
Interior articles	Bed sheet, Carpet, PVC-tile, Tape, Storage bag, Bathroom article, Kitchen article, Floor mat,
Childcare article	Pacifier, Bib

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Nordic Enforcement project 2023

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