

Suggestions from ANEC for future Coordinated Enforcement Activities on Product Safety (CASP)

PRODUCT-SPECIFIC ACTIVITIES

TOYS

Toy guns

- There is evidence that the product poses a risk to the health and safety of consumers (high number of RAPEX notifications, accident data, consumer complaints, etc.)
- This product is addressed to vulnerable consumers.
- This product is of cross-border relevance.

Magnets in toys

The swallowing of toy magnets by young children is a continued concern.

CHILDCARE ARTICLES

Changing units

- There is evidence that the product poses a risk to the health and safety of consumers (high number of RAPEX notifications, accident data, consumer complaints, etc.)
- This product has a high market penetration.
- This product is addressed to vulnerable consumers.

High chairs

- There is evidence that the product poses a risk to the health and safety of consumers (high number of RAPEX notifications, accident data, consumer complaints, etc.)
- This product has a high market penetration.
- This product is addressed to vulnerable consumers.

Other child care articles suggested by ANEC members:

- **playpens**
- **safety barriers**
- **child bicycle seats**

HOUSEHOLD ELECTRICAL APPLIANCES

Refrigerators

- There is evidence that the product poses a risk to the health and safety of consumers (high number of RAPEX notifications, accident data, consumer complaints, etc.)
- This product has a high market penetration.
- This product is addressed to vulnerable consumers.
- Several fatalities after fridges catching fire (e.g. Grenfell Tower UK)

Sunbeds

Product related aspects (lamps) and service related aspects in tanning saloons; many sunbeds in the UK found not compliant with the standard.

Travel adapters – plugs

Products that seem to appear frequently in the Safety Gate (RAPEX) are travel adapters – plugs that allow the user to use electrical sockets in different countries.

Other household electrical appliances suggested by ANEC members:

- **Electric blankets**
- **TV (LED)**

NEW PRODUCT CATEGORIES

Connected Products

- There is evidence that the product poses a risk to the health and safety of consumers (high number of RAPEX notifications, accident data, consumer complaints, etc).
- This product has a high market penetration.
- This product is addressed to vulnerable consumers.
- Privacy & security aspects of toys, household appliances, ...
- Internet of Things
- Products with built-in RFID/NFC tags (labels, implants etc.) and with other wireless access features (WiFi, mobile communication protocols etc.)

Consumer laser products

OTHER PRODUCTS

Child protective products

Products covered by standards developed by CEN/TC 398 'Child protective products' should be considered: **window locking devices** (EN 16281), **finger protection devices** (EN 16654) and **cupboard and drawer locking devices** (EN 16948).

A manufacturer producing such products informed us that they are concerned about the absence of any market surveillance in this area and that many products are on the market which do not comply with the standards.

A failure of the protective function may put children at considerable risk. In case of window locking devices this could easily result in a fatality. But also not properly functioning of finger protection devices or cupboard and drawer locking devices may result in serious injuries.

Concerning window locking devices, we learnt from the ICPHSO conference in October 2020 that behaviour patterns and routine have changed because of the COVID pandemic (e.g. spending more time at home), which led to an increase in falls from windows because of longer exposure.

Decorative oil lamps

Most important aspect is that children are not able to access the oil. Similar to the child protective products mentioned above, a failure may put the child at considerable risk.

It would be very helpful to have some data when a revision of the standard EN 14059 'Decorative oil lamps' is initiated. A market surveillance activity could also check the

standard itself. Following a proposal from DIN, discussions on a possible revision of EN 14059 will start in a new WG of CEN TC 46.

Personal care items (suncreams, shampoo, ...)

- There is evidence that the product poses a risk to the health and safety of consumers (high number of RAPEX notifications, accident data, consumer complaints, etc.)
- This product has a high market penetration.
- Testing this product is expensive
- This product is of cross-border relevance.
- Questions from consumers about ingredients.

CROSS-CUTTING PRODUCT-SPECIFIC ACTIVITIES

Goods and products sold at street markets

These contain the highest proportion of dangerous and counterfeit goods.

Products from small, often home-based, manufacturers

Small, often home-based, manufacturers are sometimes unaware of standards and do not use test labs. They are probably not part of trade associations so don't know what their obligations may be. In the child area, products such as soother holders and teething rings might fall into this category.

HORIZONTAL & CROSS-CUTTING NON PRODUCT-SPECIFIC ACTIVITIES

Testing the labs

Some certificates for consumer products claim compliance with a standard and/or its parts, while the product is clearly not complying and even presents serious risks to users.

One of the reasons is that the notified body doesn't check the product against all clauses of the EN. These "partial" certificates may discredit the standards, are clearly misleading, make the work of market surveillance authorities more complex and should be outlawed.

We are aware of misleading certificates for playground equipment and bunk beds.

Parallel testing of identical products and development of guidance to address differences in interpretations and/or testing

Our recollection of past Joint Actions is that some of the problems that are identified are based on poorly drafted standards or variations in interpretations of standards. To understand whether there are issues that make a standard ambiguous, either because of poor drafting or other causes, we suggest that identical products should be submitted to different MSAs for review and to different test houses for testing.

If, as seems likely, there are differences in the results, workshops involving key players should be held to try to elicit why these differences result. Then a training package should be developed and delivered for MSAs, test houses and/or standards developers, including agencies responsible for translating standards, to address problems. If necessary, guidance documents should be drafted for future use.

What products should be used for such an exercise is open to debate.

Joint risk assessment

It has come to our attention that MSAs are doing risk assessment in a different way than manufacturers. It is very important for consumer protection to do the risk assessment of joint actions (partly) together in order to learn from each other. Such cooperation could result in less Formal Objections from MSAs against specific standards.

ENDS.