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ANEC position on classification of buoyant aids and armbands for swimming

ANEC is concerned about the current debate on the classification of buoyant aids, swim seats and armbands. In particular, ANEC is disappointed about the decision to exclude armbands from the Personal Protective Equipment (PPE) Directive. Armbands are indispensable PPE (EN 13138-1) when young children learn to swim. This was never questioned during the standardization work.

In addition, armbands are explicitly mentioned in the PPE Directive, more in particular in Annex II, under point 3.4 "Additional requirements specific to particular risks, Prevention of drowning (lifejackets, armbands and lifesaving suits)".

Drowning is the second leading cause of injury death for children in Europe. When young children learn to get used to the water and learn to swim, armbands are the only PPE that is advised, because they are fixed to the body and because they are worn close to the neck and shoulders. This increases the chance that the head of the child is staying above the water. Therefore, ANEC does not understand why armbands should be excluded from the PPE Directive.

What was and still is under debate in the standardization field are swim rings. They are very questionable with regard to their function as PPE as they are not attached to the body in a reliable way. We agree that they should not be considered as PPE. It is certainly wise to move swim rings to part 3 of EN 13138 where the devices to be held (also held by the body) are dealt with.

Apart from the swim rings, ANEC considers it wrong to split up various swimming aids covered by the scope of EN 13138-1. They shall all be regarded as PPE. They are linked with the drowning risk, they are firmly attached to user's body and from a consumer point of view they need third party type testing due to their crucial importance.

ANEC is of the opinion that all swimming aids attached to the body should remain under the PPE Directive, subject to third party testing. The General Product Safety Directive would not provide the same level of consumer protection for armbands, as only third party testing is the adequate tool to ensure protection.

Excluding armbands from the PPE Directive will put child safety at stake and will increase the drowning risk.