

Template for comments and secretariat observations

Date: 28 February 2012	Document: ISO/IEC CD Guide 51 "Safety aspects - Guidelines for their inclusion in standards"
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ANEC-GA-2012-G-005

1	2	(3)	4	5	(6)	(7)
MB ¹	Clause No./ Subclause No./ Annex (e.g. 3.1)	Paragraph/ Figure/Table/ Note (e.g. Table 1)	Type of comment ²	Comment (justification for change) by the MB	Proposed change by the MB	Secretariat observations on each comment submitted
ANEC	Introduction	1 st para	ed	The Introduction indicates that the Guide covers "safety aspects in product standards", while other parts of the Guide (e.g. clauses 6.1, 6.3.2, etc ...) refer to "products, processes and services".	Consistency should be checked throughout the document.	
ANEC	Introduction	3 rd para	ed	The first sentence does not make sense.	Replace with "This Guide adopts an approach aimed at reducing the risk, wherever the product, process or service is used, including use by children and other vulnerable consumers." (Note that in the 2 nd para and in 6.4.1, vulnerable consumers and children are listed separately, hence the proposed change.)	
ANEC	Introduction	3 rd para	ed	The Introduction indicates that the Guide covers "safety aspects in product standards", while other parts of the Guide (e.g. clauses 6.1, 6.3.2, etc ...) refer to "products, processes and services".	Consistency should be checked throughout the document.	
ANEC	1. Scope		ge	It is not clear from the scope whether the Guide is intended to also cover the safe production and disposal of the product.	Clarify scope better in order to encompass consumer safety but also producer and employee safety, and this all along supply, transformation, distribution and waste disposal chain.	
ANEC	1. Scope		ed	You cannot have a combination of "one" of these.	Replace "or a combination of one or more of these (e.g. people only; people and property; people, property and the environment)" with "or a combination of these (e.g. people and property; people, property and the environment)"	
ANEC	2 Normative references		te	The first part of the new ISO/IEC joint label standard for preparing structuring and presenting instructions for use, IEC/ISO 82079 is out for final vote and should be	Add to list of standards normatively referenced: 'IEC/ISO 82079 Preparation of instructions for use	

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2 **Type of comment:** **ge** = general **te** = technical **ed** = editorial

NOTE Columns 1, 2, 4, 5 are compulsory.

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				published during 2012. See also our comments below on 6.4.2.2 and 6.4.2.3.	– structuring, content and presentation (all parts) ⁷	
ANEC	3.7	Addition	te	A statement is missing that the absence of reported injury does not necessarily mean that there is no hazard. We suggest to use the statement from EN ISO 14121-1:2007, clause 4d.	Add to the note under 3.7: "The absence of an accident history, a small number of accidents or low severity of accidents should not be taken as a presumption of a low risk."	
ANEC	3.15		ed	The general public and consumers are the same thing. They do not need to be included separately	Delete "general public or"	
ANEC	3.8	Note 2	ed	The current Note is inaccurate.	Replace with "ISO/IEC Guide 50 gives guidance on the needs of children and ISO/IEC Guide 71 covers the needs of older persons and persons with disabilities"	
ANEC	5.1		ed	Elsewhere the phrase "product, process or service" is used.	Consistency should be checked throughout the document.	
ANEC	5.1		te	There is a need, noted elsewhere, to include disposal in the "supply chain"	Replace "goes through the supply chain from development to the user (consumer)" with "goes through the supply chain from development to the user (consumer) and – on to its eventual disposal -".	
ANEC	5.5.3		te	This paragraph gives no explanation of why the order of priority should be as advised in 5.5.2.	Add at the end of the paragraph: "However the greater the number of hazards left to safeguarding by user behaviour, the greater the opportunity for human errors leading to harm. In standards preference should therefore be given to reducing the most severe risks through requiring inherently safer design and built-in protective devices."	

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ANEC	6.1	Note 3	ed	The current Note is inaccurate	Replace with "ISO/IEC Guide 50 gives guidance on the needs of children and ISO/IEC Guide 71 covers the needs of older persons and persons with disabilities"	
ANEC	6.2	c)	te	How a standard should be written needs more explanation for example: Is the standard to be written using a hazard based approach? Use of informative annexes	More details needed	
ANEC	6.2	d)	te	This needs clarification, particularly in relation of how the record of decisions and metrology are kept	Clarification required	
ANEC	6.3	Addition	te	It would be helpful to give some guidance on experts who should be involved in the making of the standard for example, manufacturers, importers, retailers, enforcement bodies, test houses and consumer representatives	Guidance required	
ANEC	6.4.1	3 rd para	ed	Redundant quotation marks at the end of the paragraph.	Delete quotation marks.	
ANEC	6.4.1	Note	ed	One of the examples of performance based risk reduction requirements in this Note contains a subjective phrase which would, according the following paragraph, need to be defined.	Delete "be sufficient to" as the phrase is subjective (and redundant).	
ANEC	6.4.2.1	Addition	te	There is no reference to information a retailer needs to supply at the point of sale which would enable the purchaser to obtain a product that is suitable for their needs. There is also no information that a shipping or delivery company would need to transport the product without creating a safety defect in it and without risking injury in	In first paragraph of 6.4,2,1, after "e.g." insert: "goods transporters, retailers, "	

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				manually handling it.		
ANEC	6.4.2.1	3 rd bullet	te	To improve the readability and include the whole life cycle, amend as described.	Replace "for installation, for use and for maintenance" with "for example, for installation, use, maintenance and disposal".	
ANEC	6.4.2.2	New paragraph	te	Currently this requirement only applies to the languages used for Warning Notices (in 6.4.2.3). It should apply to all product information.	After 2nd para, insert new paragraph: "Safety instructions shall comply with IEC/ISO 82079, including being comprehensible to users in all intended countries of use".	
ANEC	6.4.2.3	Para after bullets		The new standard for instructions makes requirements for the minimum size of text and graphical symbols used in warning notices and instructions on a product, according to intended viewing distance.	After "ISO 7001", insert: "IEC/ISO 82079"	
ANEC	6.4.3		te	This paragraph appears to cover the potential harm to the handler of the product. E.g. plastic packaging can result in suffocation to children.	After "requirements for", insert: "the reduction of any potential risks posed by ..."	
ANEC	Bibliography		ed		Add EN ISO 14121-1:2007: "Safety of machinery – Risk assessment – Part 1: Principles"	

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