

Consumer Product Safety in Europe: Results of the 2012-2014 market studies

December 2014



Sponsored
By

IFIA

(International Federation of
Inspection Agencies)

and by

CEOC

(International Confederation of
Inspection and Certification
Organizations)

AGENDA

✓ DATA

(Purpose, Method, Numbers)

✓ CONSIDERATIONS

(So what? What does this mean?)

✓ TAKEAWAYS

(Where can we go from here)

WHAT was the purpose?

| | |
|--------------------------------------|--|
| Objective | <i>To gauge the effectiveness of securing safety of consumer products, comparing self declaration system and 3rd party testing and certification</i> |
| The Surveys: 2012 2013 2014 | <p>Testing products purchased on the open EU market that are subject to CE marking via the '<i>Self Declaration Of Conformity</i>' route</p> <p>Comparing the results versus:</p> <p>Products that are <i>Certified</i> by an independent third-party entity</p> <p>Added in 2014: products purchased in the USA (also <i>Certified</i> by an independent third-party entity)</p> |

HOW the studies were executed

➤ The following product categories were chosen as being representative of imported electrical goods that have:

- *wide market distribution,*
- *established safety standards*
- *relevant potential of causing harm to consumers*

- a) **Battery Chargers/Adapters**
- b) **Luminaires (LEDs, classic)**
- c) **Hair dryers/curlers**
- d) **Room heaters**
- e) **Electric Fans**
- f) **Toasters, grills and similar**

➤ In 2014 we added **irons** to the list



METHODOLOGY (2 of 2)

➤ Samples were purchased from regular stores, in:

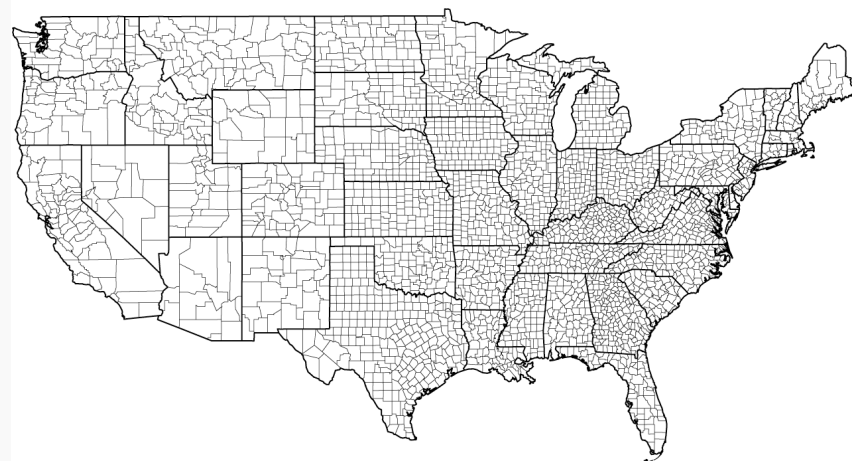
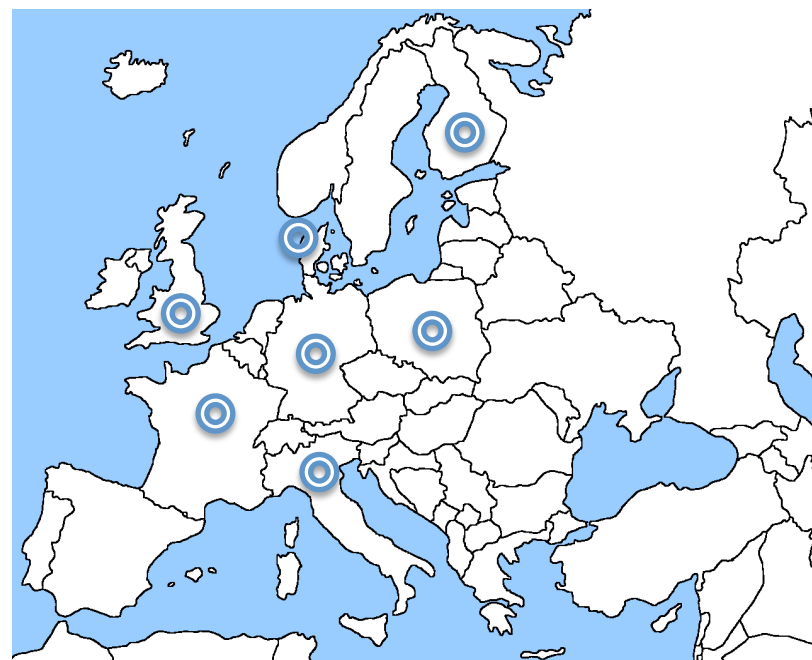
- ✓ **Denmark**
- ✓ **Poland**
- ✓ **Germany**
- ✓ **France**
- ✓ **UK**
- ✓ **Italy**
- ✓ **Finland**

And, new in 2014, from retailers in:

- ✓ **USA**

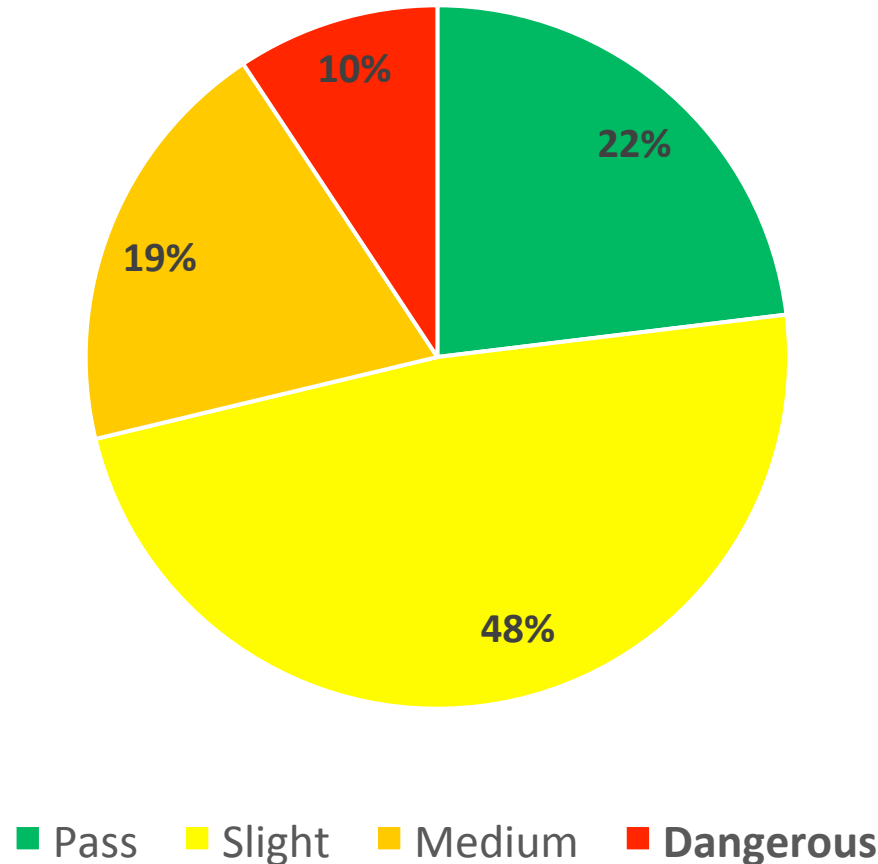
➤ An independent laboratory was selected, with the following characteristics:

- ✓ Not connected to any IFIA member
- ✓ Notified Body for Low Voltage Directive
- ✓ Familiar with the product categories
- ✓ Familiar with market surveillance protocols



DATA POINT No. 1

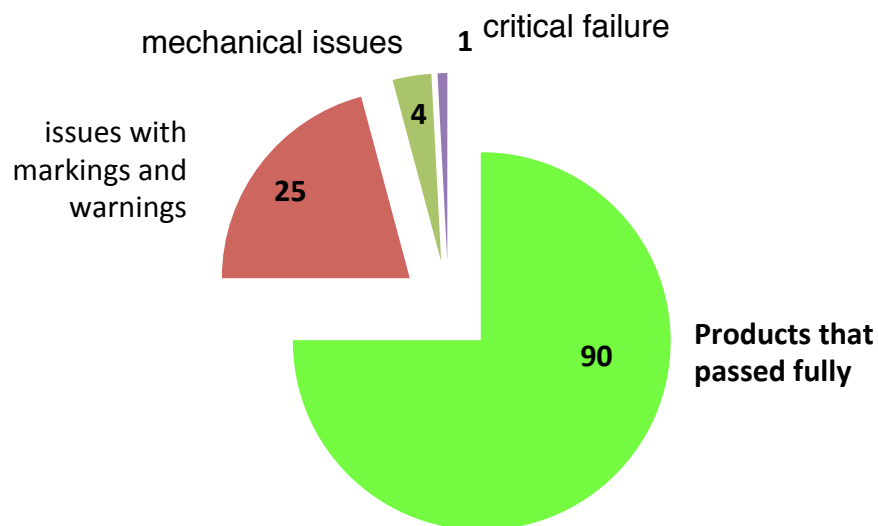
EU products with CE Markings only (self-declaration)



- Of the 247 samples submitted, **78%** were **NOT** in compliance with EU standards and regulations
- There were **38 instances of safety critical failures** which were reported to the local authorities
- Simpler requirements (marking labels and safety instructions) were not met by more than 50% of products evaluated

DATA POINT No. 2

EU products certified by accredited, independent third-party bodies

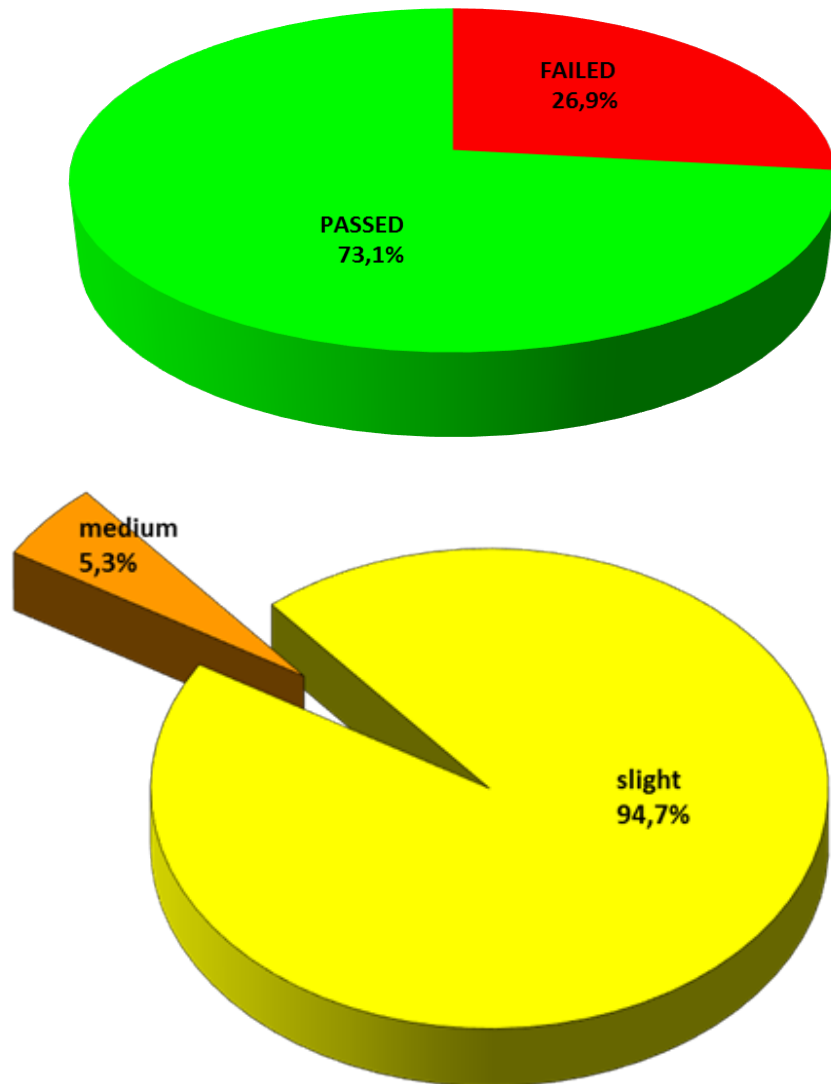


- Of the 120 samples submitted, there was only **1 instance** of a safety critical failure, which was reported to the certifier, and then to the manufacturer
- **25%** were not in full compliance with EU standards and regulations: marking labels and safety instructions accounted for the vast majority of the issues



DATA POINT No. 3

Added in 2014 – USA products
(certified by accredited, independent third-party bodies)



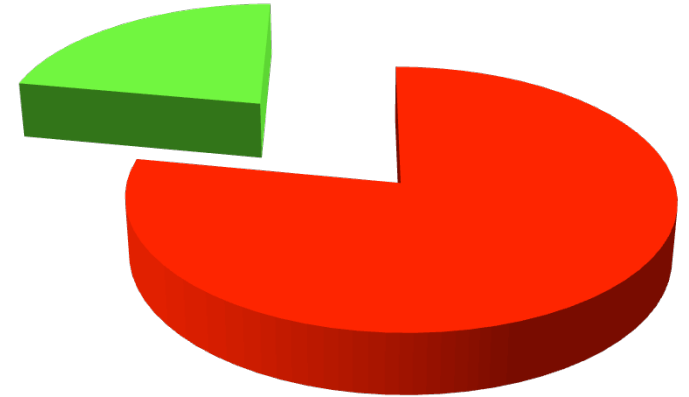
- There was NOT a single instance of safety critical failures
- Of the 119 samples submitted, only 2 showed 'medium' (mechanical nature) non-conformities
- Again, simpler requirements (marking labels and safety instructions) accounted for the vast majority of the issues

Summary (1 of 2)

Products where compliance is 'self-declared'
(i.e. NOT reviewed by an independent third-party):

- **Non-compliant/faulty products 78%**

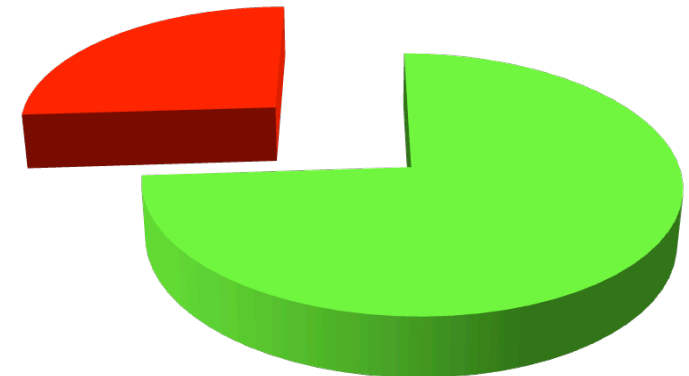
*Note: These products are on the market today,
and can be purchased and used by any EU consumer*



**Products where compliance is assessed
by an accredited, independent third-party:**

- **Non-compliant/faulty products 26%**

*Note: the vast majority were issues
related to warnings and labels*



2012-2014 Cumulative Study Data

Products where compliance with safety standards is 'self-declared' (i.e. NOT reviewed by a third-party):

- > Number of test failures deemed 'dangerous' (i.e. Risk of electric shock, fire, relevant physical damage) = 38
- Percentage of products tested that bear 'dangerous' issues = 13 %



Products where compliance with safety standards is assessed by an accredited, independent third-party:

- > Number of test failures deemed 'dangerous' (i.e. Risk of electric shock, fire, relevant physical damage) = 1
- Percentage of products tested that bear 'dangerous' issues = 0,5 %



Consideration: Why the difference?

Safety is not a subject to be taken lightly

Our industry takes this very seriously:

- ✓ Technical competence
- ✓ Accreditation and competence of laboratories
- ✓ Research and Development
- ✓ State of the Art safety science
- ✓ Independence and Objectivity
- ✓ Consistency and Dedication
- ✓ Value of full-product-cycle certification



Other data points...

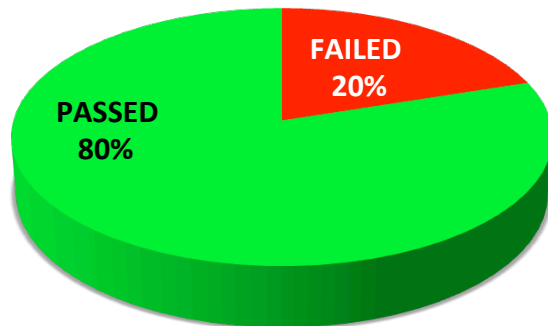
- TUKES (Finnish market inspection authority): in 2011, out of 790 samples surveyed from market, 78% found not in compliance
- ProSafe (EU professional organization for market surveillance authorities and officers) – Joint Actions 2012 results:
 - Lighting Chains: 70,6% not in compliance
 - Sunbeds: 64% with too high radiation (plus other documented defects)
 - Bicycle helmets: 63% not in compliance
- Of 3,962 items that were surveyed in Switzerland, and subjected to rigorous measurements, a high proportion of the devices were found defective (976 altogether) and none met the EMC requirements.
- Two other Member States also revealed similarly unacceptable percentages, when testing products that fell under the Machinery and the EMC Directives:
 - 47% did not meet the Machinery Directive prescriptions, and
 - 89% had technical non-conformities
 - 33% failed the EMC tests
- A survey conducted in 2012 amongst the major testing and certification institutes indicated that:
 - Rate of success for first-time product submittals: 50%
 - Percentage of periodic factory inspections that yield non-compliant findings: 15%
 - Percentage of periodic factory inspections that yield 'dangerous' non conformities: 10%

Other data points... Electro Magnetic Compatibility

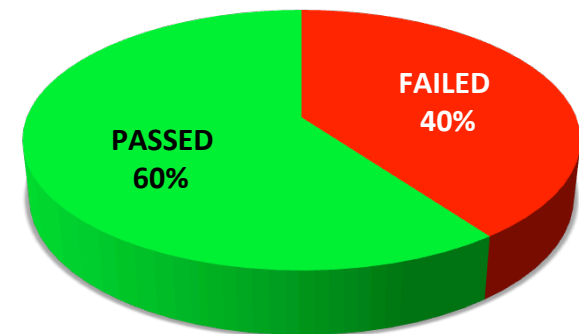
- In 2014 we expanded the scope of our studies to include limited testing on EMC compliance
- The category chosen for this first exercise was 'Radio Controlled Toy Cars'
- Certification for EMC testing for these devices is not mandatory in the US
- 15 samples were purchased in Europe, 15 in the US
- Self declaration in the US appears to lead to a decline in pass rates



| SAMPLES TESTED | 15 |
|----------------|----|
| PASSED | 12 |
| FAILED | 3 |



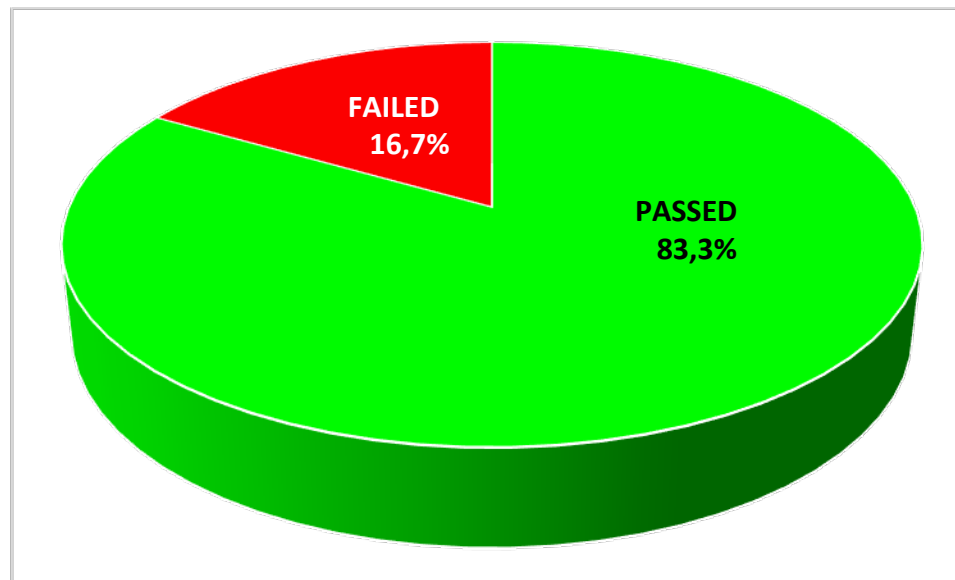
| SAMPLES TESTED | 15 |
|----------------|----|
| PASSED | 9 |
| FAILED | 6 |



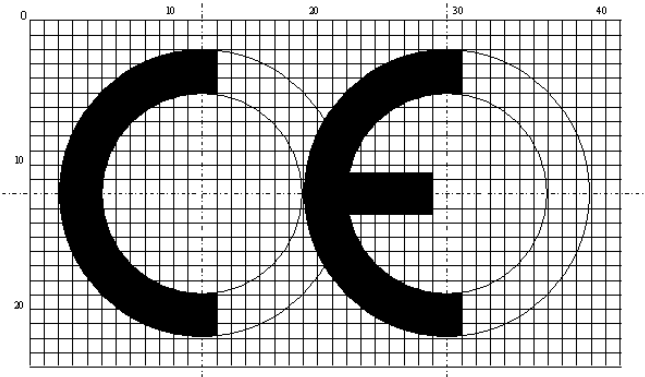
Other data points... Sound Pressure measurements

- In 2014 we also expanded the scope of our studies to include limited testing on the sound pressure exercised by listening devices (such as earphones, headphones, etc) on the human ear
- 30 samples were subjected to the relevant tests
- There is no mandatory third party testing for these devices

| | |
|-----------------------|-----------|
| SAMPLES TESTED | 30 |
| PASSED | 25 |
| FAILED | 5 |



Considerations on CE Marking (for Consumer Products)



- **Confuses consumers into thinking that products are 'safe' (let alone 'compliant' with all applicable directives and regulations)**
- **Misunderstood by most operators**
- **Mandatory, ergo not distinguishing**
- **Counterfeited and misused over 78% of the time (with very few penalties)**
- **More confusion: it is applicable to *some* consumer products, but to others not (ref. GPSD > CPSR)**
- **No pride of ownership, direct responsibility**

Considerations on counterfeit products



Internet

Retail
Stores

Flea
Markets

Survey was run with samples purchased from Retail Stores: data suggests that we need to pay further attention to what is sold over Internet, Flea markets, etc.

**LEVERAGING
DATA
TO
ENABLE THE
RIGHT POLICY
SOLUTIONS**

**Consumer
Associations,
NGOs**



**Manufacturers
and Industry
Associations**



**Regulators,
Inspection
Authorities**



Thank you

International Federation of Inspection Agencies

1 Paternoster Square

London EC4M 7DX

United Kingdom

T: +44 20 7653 1604

F: + 44 20 7236 1977

www.ifia-federation.org