

## ANEC input to the

### Public consultation on the EC draft decision on the safety requirements to be met by European standards for certain children's products

(4000 characters limit)

ANEC overall welcomes the EC draft decision and the consideration the Commission and Member States have given to our previous comments.

We re-iterate our strong support for a hazard-based approach when developing safety requirements and welcome that all relevant hazards have been identified and listed in the draft.

We welcome the clarification in relation to existing mandates and to connected products.

In addition, we welcome in particular the following elements covered by the Annex:

- "Whenever possible, special needs of users with disabilities - both carers and children, shall be taken into account to ensure their safety".
- "Appropriate information to draw the attention of parents and carers shall be placed on the children's products - and/or packaging - ...", which excludes such information to be provided in a digital way only.

We suggest the following aspects to be included in the recitals of the draft Decision:

- Precautionary principle: While we agree that the "safety requirements should reflect the new scientific and technical knowledge and the market evolution", we call for the precautionary principle to be better reflected, so as to also guide the development of standards as well as the design and safety assessment of children products. It is a cornerstone of the General Product Safety Directive on which the present draft decision is based.
- Accident and injury data: accident and injury data must be taken into consideration in addition to "anthropometric data, medical research, known health advice (...) and state-of-the-art scientific and technical knowledge regarding children's safety and/or health". Absence of an accident history should not be taken as an automatic presumption of low or no risk.

**A N E C - The European Consumer Voice in Standardisation**  
Rue d'Arlon 80 - 4th Floor, B-1040 Bruxelles, Tel.: +32 (0)2 743.24.70  
[anec@anec.eu](mailto:anec@anec.eu) - [www.anec.eu](http://www.anec.eu)

***Raising standards for consumers***



ANEC is supported financially by the European Union & EFTA

- Severity of the risks: The safety requirements associated with each hazard (listed in the Annex) should reflect the severity of the risks resulting from the hazard. Where there is a high probability of a hazard resulting in death, or long term or disabling injury, the hazard should be 'eliminated'. In situations where the severity of injury is generally less, it may be sufficient to 'limit', but not necessarily eliminate, the hazard. This concept is reflected in the ANEC comments on the analysis of hazards presented in the Annex."

In Article 1:

- it is not clear from the scope whether sports, playground and recreational equipment are covered. If not, we re-iterate the need to set up a separate COM Decision on the safety requirements to be met by European standards for these products.
- (b): in relation to 'transportation': are car seats included?

Annex:

We submit some further comments on the Annex in order to ensure the text not only offers the fullest clarity to the regulators and enforcement authorities but offers the highest levels of safety practicable to children. See [link](#).

ENDS.