



Position Paper

Safety of household appliances for all

ANEC comments on draft revised Parts 2 of EN 60335

Annex 1 to ANEC-ML-2008-0173

ANEC comments on draft revised Parts 2 of EN 60335

For many years now, ANEC and other consumer organizations have been expressing concerns about the restrictive scope of the standards EN 60335 on the safety of household and similar electrical appliances. The standards exclude the use of appliances by both children and “infirm persons”. We believe this to be wrong as research commissioned by ANEC, the UK government, and by consumer representatives in the British and German standards organisations has shown that children, and older and disabled people, do use these electrical appliances for their intended purposes, often without supervision.

Hence the needs of children, elderly and disabled people, must be recognised in the EN 60335 series of standards to ensure that electrical appliances in the home are safe for use by all consumers.

Consumer representatives have asked for the revision of these standards since 2005 and it was an ANEC proposal that led to the creation of a specific group dedicated to the issue, CENELEC TC 61 WG 4. In 2006, the European Commission issued Mandate M/392 to support the work of WG 4.

As a result of the work in WG 4, the following revised Parts 2 of EN 60335 are now submitted to the national delegations of CENELEC TC 61 for comment/approval with 21 November 2008 as deadline:

- 60335-2-2: Vacuum cleaners and water-suction cleaning appliances
- 60335-2-3: Electric irons
- 60335-2-6: Cooking ranges, hobs, ovens and similar appliances
- 60335-2-7: Washing machines
- 60335-2-23: Appliances for skin or hair care
- 60335-2-52: Oral hygiene appliances

Although ANEC is pleased with the proposals for revision of Parts 2 of EN 60335 on the grounds that the essence of the proposed Part 2 standards represents a step in the right direction of making household appliances safer for consumers of all ages and abilities, ANEC reiterates its disappointment at the rejection of surface temperature limits for handles and knobs and their exclusion from the revisions of the Part 2 standards. Hot handles and knobs pose a serious safety risk to children and elderly people. As a consequence of their exclusion, we think the proposed Part 2 standards only partially meet the requirements of Mandate M/392 as far as the safety of vulnerable consumers is concerned.

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We are aware of the proposal to have further tests carried out in order to determine the risks posed and the request made to the Commission to support the tests. However, we must stress that a balanced exchange of views was not possible during the September 2008 WG 4 meeting due to the very late submission from the industry representatives. The document was submitted - and allowed to be submitted - on the final day of WG 4 meeting, so upsetting the delicate balance of the discussions that had been achieved during the duration of the meeting.

We now urge National Committees to request WG 4 to start working on surface temperature limits for handles and knobs without further delay, according to CENELEC Guide 29 "Temperatures of hot surfaces" which provides guidance on how to perform the risk assessment related to hot surface temperature.

ANEC believes that although CENELEC Guide 29 only applies to non-functional surfaces and some plastic materials, the temperature limits can be used as an indication of which temperatures are acceptable for children and elderly people to touch especially when these temperatures correspond to handles and knobs.

Acknowledgements

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APPENDIX – About ANEC and other documentation

A.1 About ANEC

ANEC is the European Consumer voice in standardisation, representing and defending consumer interests in standardisation and certification, and in policy and legislation related to standardisation. Our aim is a high level of consumer protection. ANEC was set up in 1995 as an international non-profit association under Belgian law. It represents consumer organisations from the European Union Member States and the European Free Trade Association (EFTA) countries. Our General Assembly is composed of one national member per country, nominated jointly by the national consumer organisations in their country.

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