



Position Paper

Safety of household appliances for all

ANEC comments on draft revised Parts 2 of EN 60335

Annex 1 to ANEC-ML-2009-0105

ANEC comments on draft revised Parts 2 of EN 60335 EN

Background

For many years, ANEC and other consumer organizations have expressed concerns about the restrictive scope of the EN 60335 series of standards 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 children and older and disabled people, do use these electrical appliances for their intended purposes, often without supervision.

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

In September 2008, several Parts 2 of EN 60335 were submitted for comments/approval to the national delegations of CLC TC 61. ANEC supported them and submitted several comments¹.

In April 2009, the following revised Parts 2 of EN 60335 are submitted again for a two months enquiry to the national delegations of CLC TC 61 for comment/approval:

- 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
- 60335-2-9: Grills, toasters and similar portable cooking appliances
- 60335-2-23: Appliances for skin or hair care
- 60335-2-25: Microwave ovens, including combination microwave ovens
- 60335-2-52: Oral hygiene appliances

¹ ANEC-ML-2008-0173

ANEC specific comments

General

Although ANEC is pleased with the proposals for revision of Parts 2 of EN 60335² 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 that the surface temperature limits of handles and knobs are still to be considered in the revisions of the Part 2 standards.

We therefore 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.

Foreword

Consumers have been asking for more than 10 years for the standards to be changed to cover use by vulnerable people, including children. Therefore we should not delay them any further. The period of introduction should be 36 not 60 months.

Document CLC/TC61(SEC)1683. Secretariat note against clauses 20.101 and 20.102.

We are surprised and disappointed to see the Secretariat note against these clauses. The wording of the proposed A2 amendment was known and fully understood when WG4 discussed and agreed these changes. In WG4, we are covering vulnerable people, including children, which the A2 amendment does not specifically address. We should retain the changes as in the proposal. What we are concerned about is that NCs will not be aware of the background of the WG4 discussions as above and are therefore at risk of making the wrong decision.

² Documents CLC/TC61(SEC)1681 to CLC/TC 61(SEC)1688

ANEC position on surface temperatures values

In addition to the enquiry on the revised Parts 2 of EN 60335, due to lack of consensus between CLC TC 61 members on the issue of surface temperature limits values for each of the above Parts 2 of EN 60335, a separate questionnaire is put forward to national delegations for reply by 8 June 2009³.

The questionnaire proposes two options of temperature values: "Option A" and "Option B".

ANEC is strongly in favour of **option B** because temperatures of touchable surfaces have been discussed over several meetings of CLC TC 61 WG4, with strong ANEC representation. The outcome of those discussions resulted in the values as given in option B. This in itself was a significant compromise for consumers as they represent temperatures just below the burn threshold. Moreover we should respect that the preparation of CENELEC Guide 29 was carried out under mandate M/346 with all parties involved and therefore we should not deviate from it. Furthermore, following the adoption of CENELEC Guide 29, all Technical Committees have been asked in writing "to assess (and to revise where needed) the relevant standards under the Low Voltage Directive with regards to ensuring compliance with the provisions of the Guide".

³ Questionnaire on the values concerning the temperatures to be established for Clause 11 of proposals prepared by CENELEC TC 61/WG 4 (Document CLC/TC61(SEC)1680)

Acknowledgements

This position paper has been prepared in consultation with the ANEC membership. ANEC wishes to thank those who have actively contributed to the drafting of this position paper and in particular the Exclusion Clause Project Team members.

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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More information about ANEC and its activities is available at www.anec.eu

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