EN

European Commission

CASP 2020

Coordinated Activities on the Safety of Products

Final Report





PROTECTING

European consumers together

Justice and Consumers

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List of abbreviations

CASP	Coordinated Activities on the Safety of Products
Contractor	EY–PRACSIS
DG JUST	Directorate-General for Justice and Consumers of the European Commission
EC	European Commission
EEA	European Economic Area
EISMEA	European Innovation Council and SME Executive Agency
EO	Economic operator
EU	European Union
HA	Horizontal activity
I&ADCS	Injury and accident data collection system
MoU	Memorandum(s) of understanding
MS	Member State(s)
MSA	Market surveillance authority
PSA	Product-specific activity
RA	Risk assessment
RAG	Risk assessment guidelines

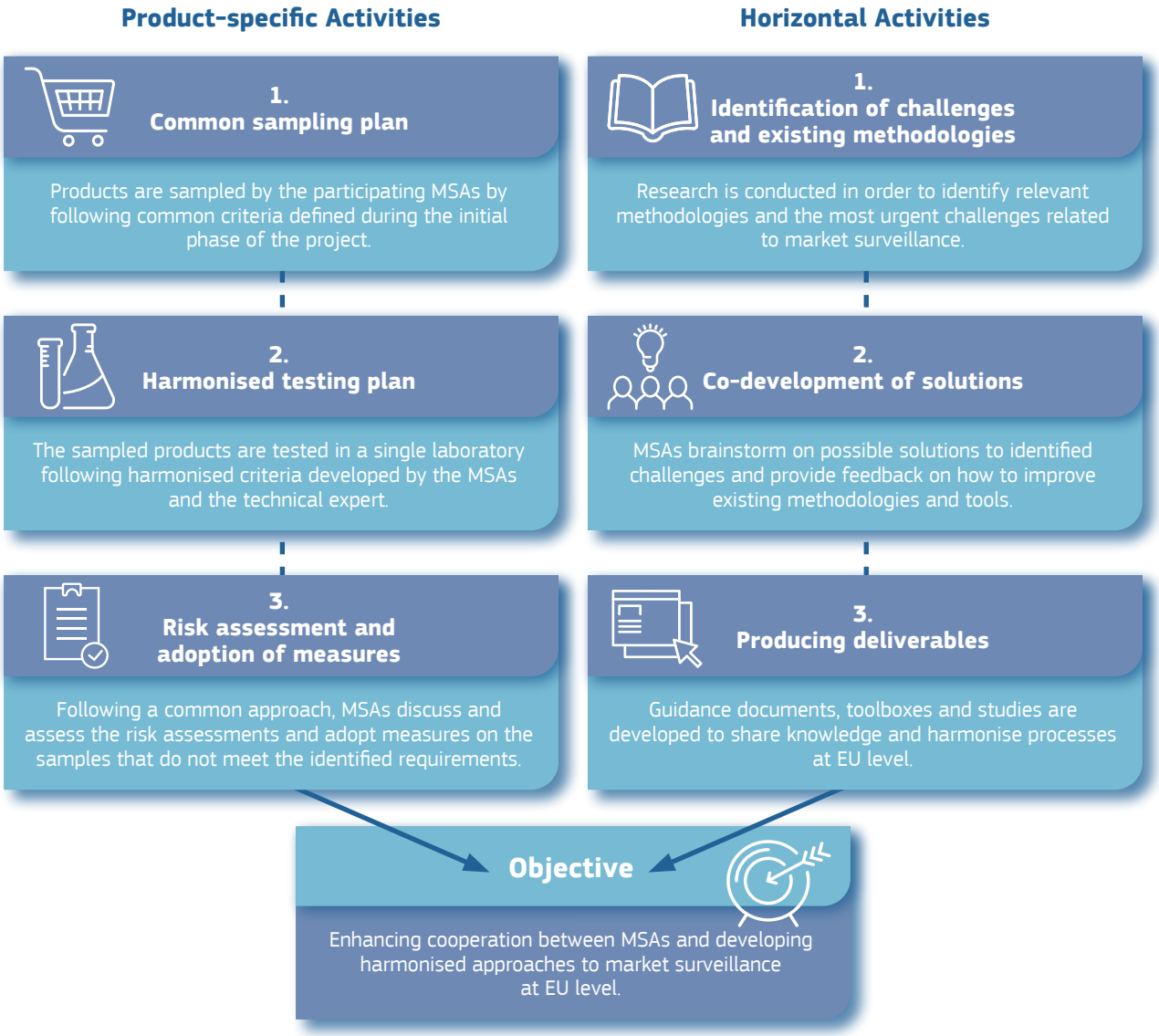
Executive summary

Please note that this report is complemented by the **CASP Online 2020 Final Report**. Together the two reports describe all the CASP 2020 activities and their outcomes in detail.

What is CASP?

The objective of the Coordinated Activities on the Safety of Products (CASP) project is to ensure a safe Single Market by providing market surveillance authorities (MSAs) from the European Union (EU) and the European Economic Area (EEA) with the necessary tools to jointly test products placed on the Single Market, determine their risks and establish common positions and procedures. Additionally, CASP aims at facilitating discussions and establishing a meaningful exchange of ideas to develop common approaches, methodologies, practical tools and guidelines.

The CASP projects bring MSAs together on a voluntary basis, according to their areas of special interest. They are carried out every year and consist of different types of activities, which can be grouped together as product-specific activities (PSAs) and horizontal activities (HAs). The tasks performed in the two different types of activities vary considerably. However, the goal of all the activities is to foster cooperation between MSAs, share knowledge and provide a forum for discussions in order to further harmonise MSAs' common approaches.

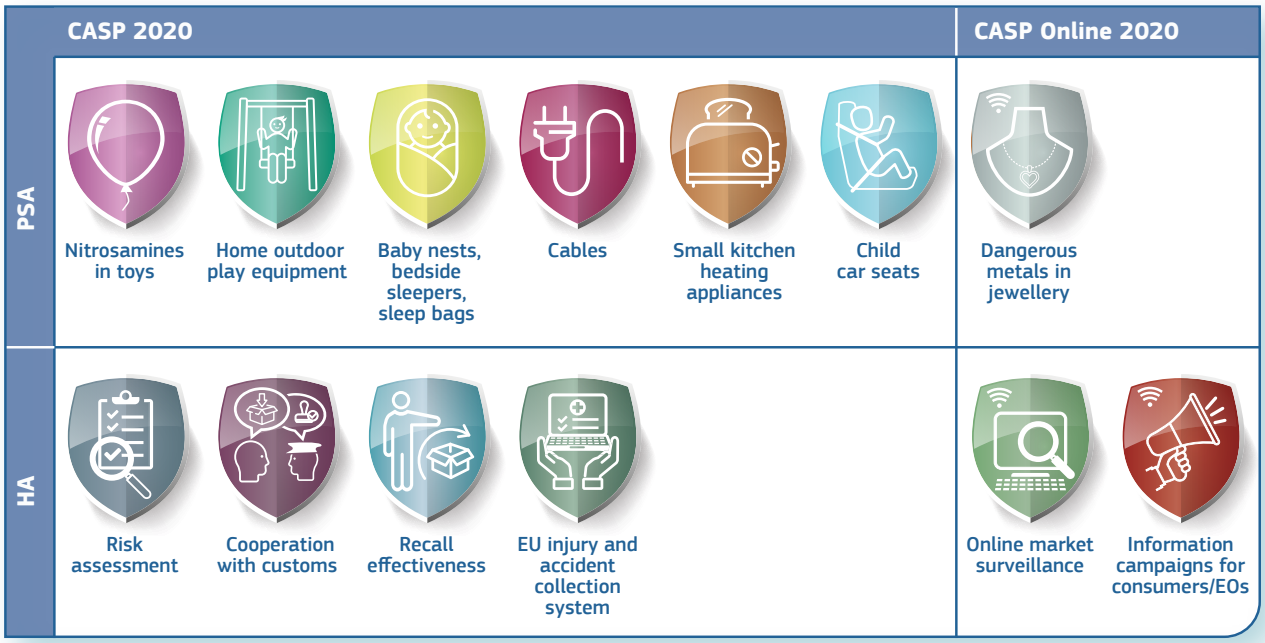


What is CASP 2020?

CASP 2020 entailed six PSAs and four HAs. The products and horizontal topics that were covered had been previously identified by the MSAs through a consultation launched by the European Commission (EC).

Due to the continuous increase of e-commerce in retail, several activities of the CASP 2020 project were dedicated to addressing online product safety. One PSA and two HAs were grouped under the CASP Online 2020 sub-project and are covered in the CASP Online 2020 Final Report.

Logos of all CASP activities

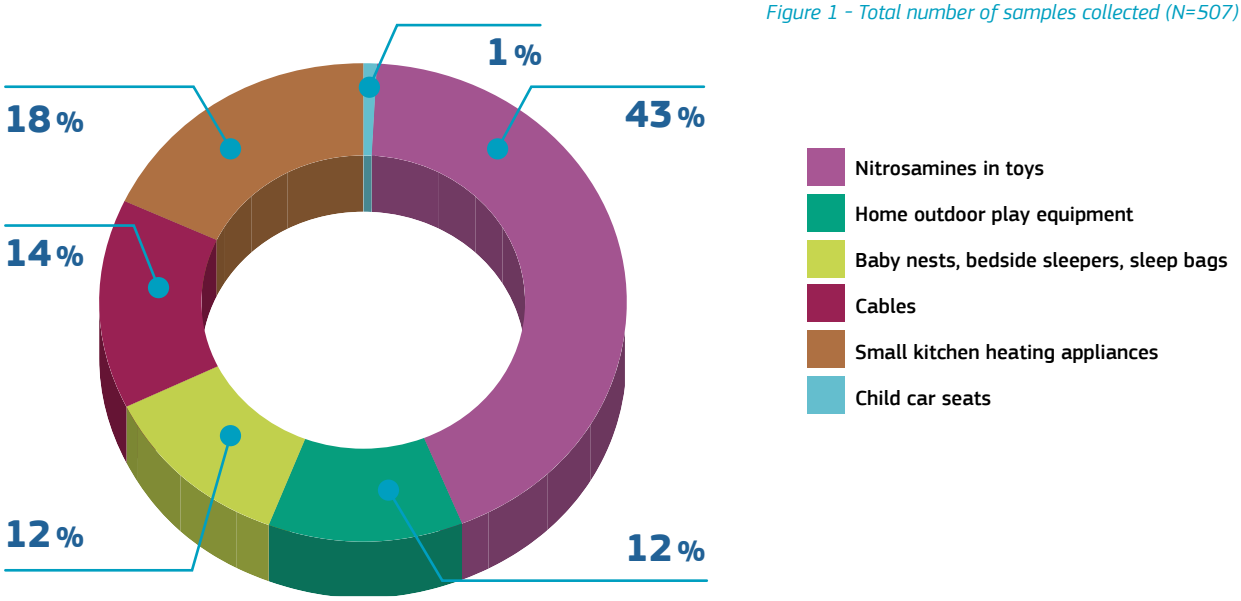


Main results and conclusions

Highlights and main results of the PSAs

Combining the six CASP 2020 PSAs, a total of 507 samples were collected by participating MSAs following a harmonised sampling methodology defined for each product category. For each PSA, the samples were tested in a single accredited laboratory using a common testing plan.

Figure 1 - Total number of samples collected (N=507)

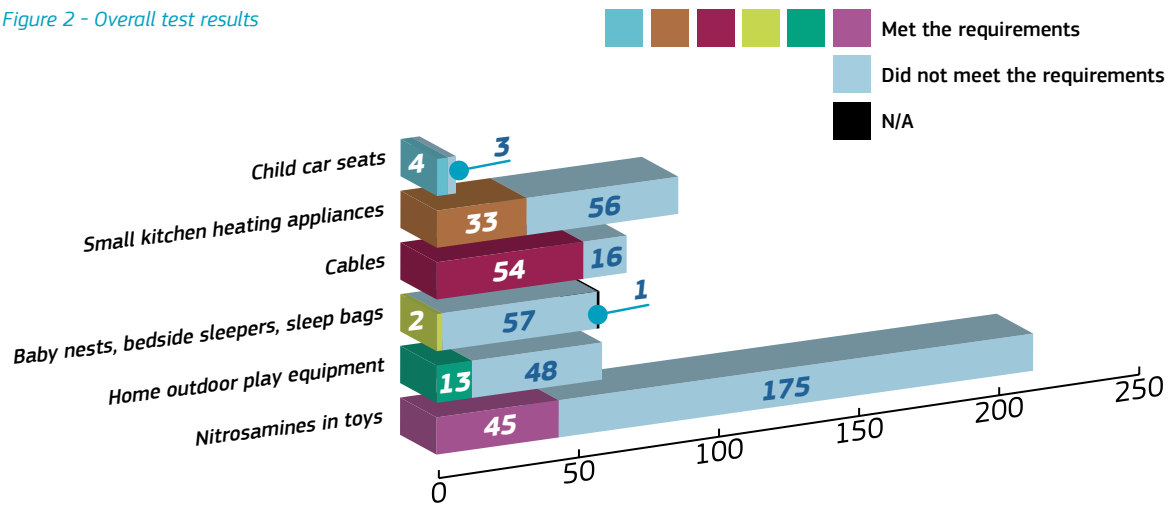


Nitrosamines in toys was the activity with the largest number of samples. On the other hand, in the Child car seats activity, the MSAs only tested one sample each, due to the very high number of specimens of the same sample required for the testing, the limited product types present in the markets of some of the participating MSAs and the high testing costs.

The test results of all the activities under CASP 2020 are based on the testing of the specific products sampled by experienced MSAs. Given that samples are usually taken following a risk-based approach, and that not all EU/EEA authorities participate in any given activity, the final results are focused on removing products that pose a risk to the health and safety of consumers. Although the results give a very good indication of the market situation, they do not provide a statistically solid picture of the European Single Market.

The graph below illustrates the overall test results for each PSA. It is important to note that 'not meeting the requirements' does not necessarily imply that the products pose a serious risk. The figures, for example, include the number of samples that did not meet the labelling and warning requirements. In general, in each PSA a significant number of samples were found with faulty or missing labelling/warnings/instructions. Labels, warnings and instructions always contain important information for consumers on how to use products correctly. If they are incorrect or missing this poses a risk. However, in general, risks linked to faulty or missing labelling/warnings/instructions have not been found to be serious.

Figure 2 - Overall test results



The Baby nests, bedside sleepers, sleep bags activity presented the highest rate of defective products, with only two samples fully meeting the requirements defined in the testing plan. On the other hand, the Cables category, and, more specifically, the Cable reels product category, had the lowest rate of defective products.

As mentioned above, the samples that did not meet the requirements defined in the testing plan do not necessarily represent a serious risk for consumers. MSAs performed risk assessments (RAs) for each sample that did not meet the defined requirements in order to identify and quantify the risks for consumers, including a determination of the severity of a potential injury that the user could suffer, and the probability of such injuries occurring. The MSAs adopted measures accordingly.

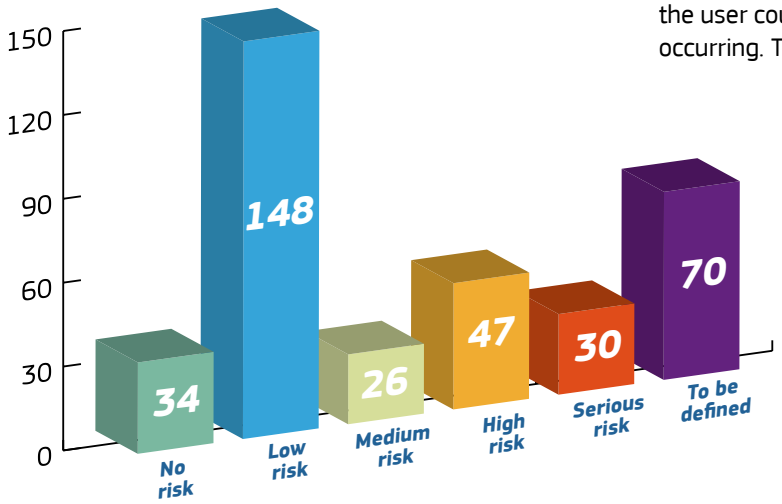


Figure 3 - Risk levels of samples that did not meet the testing requirements[1]

Table 1- Number of samples presenting a serious risk out of a total of 507 samples tested

Product category	Samples tested	Serious risk (# samples)	Serious risk (%)
Nitrosamines in toys	220	17	8
Home outdoor play equipment	61	1	2
Baby nests, bedside sleepers, sleep bags	60	7	12
Cables	70	4	6
Small kitchen heating appliances	89	0	0
Child car seats	7	1	14

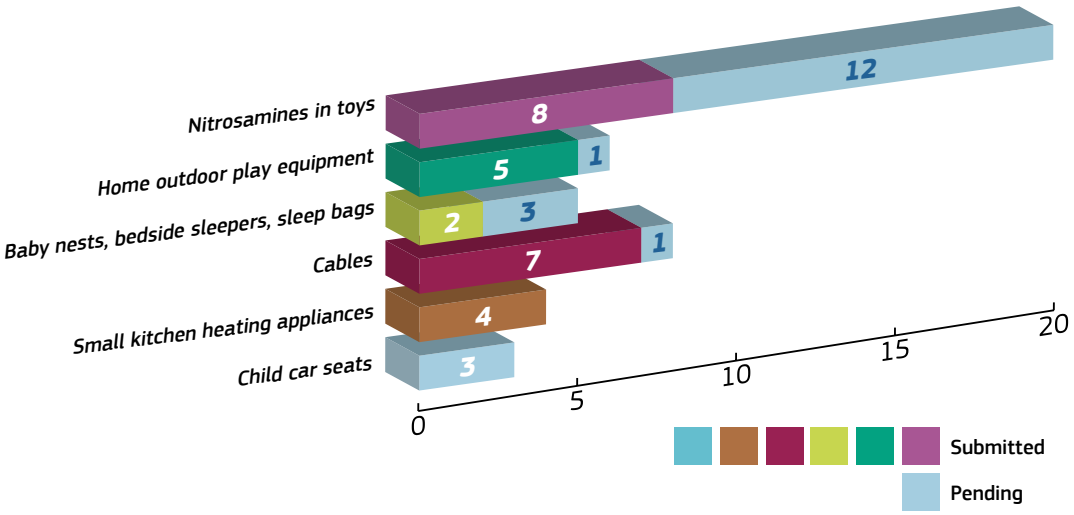
Table 2- Summary of corrective measures adopted by MSAs per PSA

	Nitrosamines in toys	Home outdoor play equip-ment	Baby nests, bedside sleepers, sleep bags	Cables	Small kitchen heating appliances	Child car seats
No action on tested product	51	16	5			
Informed responsible MSA[2]	28	12			5	
Informed economic operator (EO)	35	1	16	4	19	1
Sales ban				1	9	1
Improvements to the product or relabelling by EO	27	7	5	1		
Withdrawal	15	2	8	5	3	1
Recall	2	9	2	3	2	
Compulsory destruction of stock	1					
Punitive sanctions against the EO	1					
To be determined	15	1	21	2	18	

[1] Reported results are based on the information available on 1 May 2021. The category 'to be defined' refers to cases where measures have not yet been determined.

[2] When the responsible EO is based in another EU Member State (MS), the responsible MSA is informed through the Information and Communication System for Market Surveillance (ICSMS).

Figure 4 - Safety Gate notifications issued based on CASP 2020 test results[3]



Highlights and main results of the HAs

The HAs allowed MSAs to discuss the challenges associated with various market surveillance topics of common interest, to exchange views and best practices and to prepare workable solutions. The outcomes of these activities aim at increasing the effectiveness of the market surveillance operations of all EU/EEA MSAs, not only those who participated in the specific activities. The table below summarises the main outputs of the CASP 2020 HAs.

The outcomes of CASP 2020 were presented during the hybrid closing event on 14 June 2021. MSAs, stakeholders and EC representatives were invited to participate remotely. Taking Covid-related measures into account, a small group was invited to Brussels to join the event in person. During the event, the results of all the activities were presented, different stakeholders were invited to share their experiences of the project and a selection of samples was exhibited and shown in detail to attendees via live streaming. The event also marked the start of the EU-wide CASP 2020 communications campaign.

All specific PSA and HA reports, as well as the communications material that was developed, are available on the CASP website (*https://ec.europa.eu/safety-gate/#/screen/pages/casp*).

HAs	Outputs
Risk assessment	• Guidance document laying down the principles of sound risk management • Guidance document on the estimation of probabilities • RA templates for products in the scope of the CASP 2020 PSAs

Cooperation with customs	• Guidelines and good practices, including
	  • a section on needs, gaps and challenges
	  • a common memorandum of understanding (MoU) template
	  • three joint training plans
	• Tips and tools for collaboration with customs for standard use in the PSA in CASP 2020

Recall effectiveness	• A–Z Recall Guide with practical advice, including best practices for use by MSAs and EOs • A set of infographics to be used to inform consumers and motivate them to participate in recall processes
EU injury and accident data collection system	• 'Study on the feasibility and modalities of an EU Injury and Accident Data Collection System'

[3] Based on the publicly available data in Safety Gate and notifications (up to 1 May 2021).

Recommendations

The following recommendations are based on the outcomes of the activities and the discussions held among MSAs during the project. Specific recommendations for each activity can be found in the dedicated activity reports.

For consumers

- **Read the labelling, marking and instructions.** Labels and instructions always contain important information on how to use products correctly. Consumers should carefully read the warnings and follow the instructions, especially when using products that can get very hot, such as small kitchen heating appliances, or when assembling and installing products such as home outdoor play equipment or bedside sleepers, as injuries may occur if the products are not assembled or installed correctly. Consumers should always check if the product includes information on the manufacturer, as this may provide additional reassurance about its safety.
- **Regularly check Safety Gate.** Consumers should verify whether the products they are planning to purchase have been notified via Safety Gate. This could help to ensure that only safe products are bought. Additionally, consumers should report any safety incidents to the appropriate MSA(s).
- **Consumers should be aware of the importance of recalls.** It is advisable that consumers register their purchases so that they can check for any potential recalls and actively participate in recall actions (e.g. by returning products), to make sure their health and safety is not put at risk by dangerous products.

EOs

- **Meet all legal requirements.** EOs are responsible for the safety of the products they place on the European Single Market. EOs should ensure that their products meet the requirements set by the applicable European legislation. In order to make sure that only safe products are marketed to EU consumers, EOs should check new notifications on Safety Gate and ensure that any new products they place on the market are safe.
- **Meet requirements for labelling, marking and instructions.** EOs should not neglect these elements, which aim at providing essential information to consumers on how to correctly use/assemble the products. For certain products, such as the home outdoor play equipment and child car seats tested in CASP 2020, instructions are essential for proper assembly and use. The products should meet all the requirements on labelling, marking and instructions, which are expected to be clear, thorough and translated into the language of the country of sale.
- **Use the risk assessment guidelines (RAG) tool[4].** The RAG tool managed by the EC is available to all EU/EEA authorities, and any other parties interested in performing RAs. EOs should use it to assess the risks potentially posed by their products and to ensure that only safe products are marketed to EU consumers.
- **Cooperate with MSAs to organise recalls.** EOs and MSAs should work together to organise and manage effective recalls, starting by informing consumers (in a way that takes best practices based on behavioural insights into consideration). If necessary, MSAs can guide EOs throughout the recall process.

[4] *https://ec.europa.eu/rag/#/screen/home*

For national authorities

- **Keep the sectors under surveillance.** A considerable number of products examined under the CASP 2020 project presented risks to consumers. Additionally, four PSAs (Nitrosamines in toys; Home outdoor play equipment; Baby nests, bedside sleepers, sleep bags; Child car seats) focused on products intended for small children, a vulnerable consumer category that requires careful and continued monitoring.
- **Issue notifications on Safety Gate.** MSAs are legally obliged to issue notifications on measures taken against products posing a serious risk. In addition, the Safety Gate guidelines also recommend issuing notifications on measures taken against products posing a less than serious risk. This is to ensure that the information is properly exchanged among authorities and to enhance awareness among EOs and consumers through the public Safety Gate website.
- **Engage with standardisation organisations to improve standards.** The outcomes of CASP 2020 may provide valuable input to the work conducted by standardisation organisations. MSAs (and the EC) should maintain continued dialogue with the relevant standardisation committees to improve existing safety standards or develop new ones (for the Baby nest product category, for example).
- **Expand the RAG tool's library.** In order to help EU/EEA authorities and other interested parties assess the risks posed by various products, MSAs should continue developing RA templates and expand the RAG tool's library in future coordinated activities.
- **Encourage close collaboration between customs authorities and MSAs.** Both MSAs and customs authorities are invited to further implement the good practices identified. MSAs and customs could benefit from MoU to officialise their collaboration, set targets, organise their cooperation and launch joint trainings.
- **Make use of the deliverables from CASP 2020 activities.** MSAs are encouraged to make use of all the results and insights that have been collected during the CASP 2020 project. Specific deliverables, such as the communications toolkit on recalls, the A-Z Guide on recalls or the guidelines on the estimation of probabilities, have been made available to all MSAs for use in their daily work.
- **Disseminate CASP 2020 results.** MSAs are encouraged to further disseminate the results and deliverables of the CASP 2020 project. MSAs are particularly encouraged to disseminate the communications material that was developed to maximise the impact and outreach of the project. Customs authorities are encouraged to do the same.

For European authorities

- **Consider following up on an EU-wide injury and accident data collection system,** taking account the cost–benefit ratio resulting from the 'Study on the feasibility and modalities of an EU Injury and Accident Data Collection System' developed during the CASP 2020 HA, and the willingness and capacity of the MSAs to collect data at national level.

1. CASP 2020 project

1.1 Description of CASP 2020 and the activities

General description

The objective of the CASP project is to ensure a safe Single Market by providing MSAs from the EU and the EEA with the necessary tools to jointly test products placed on the Single Market, determine their risks and establish common positions and procedures. Additionally, CASP aims at facilitating discussions and establishing a meaningful exchange of ideas to develop common approaches, methodologies, practical tools and guidelines.

CASP 2020 represents the second edition of the CASP annual projects. The CASP 2020 project consists of two types of activities:

- Europe-wide enforcement activities, called product-specific activities or **PSAs,** which focus on testing samples of the identified product categories by adopting harmonised testing and sampling criteria;
- knowledge sharing and discussion fora to develop and improve existing methodologies and common approaches for different aspects of market surveillance, called horizontal activities or **HAs**.

Before the launch of the CASP 2020 project, the Directorate-General for Justice and Consumers (DG JUST) coordinated a priority setting exercise to gather input from the MS regarding the choice of products and areas to be included in the coordinated activities. Six PSAs and four HAs were selected for the CASP 2020 project based on this approach.

CASP 2020 - Product-specific activities (PSAs)
Nitrosamines in toys
Home outdoor play equipment
Baby nests, bedside sleepers, sleep bags
Cables
Small kitchen heating appliances
Child car seats[5]

CASP 2020 - Horizontal activities (HAs)
Risk assessment
Cooperation with customs
Recall effectiveness
EU injury and accident data collection system

Please note that this report is complemented by the **CASP Online 2020 Final Report.** Together the two reports describe all the CASP 2020 activities and their outcomes in detail.

MSAs also identified important challenges regarding the new online environment that has arisen due to the continuous increase of e-commerce in retail. A decision was made, therefore, to also organise a specific CASP Online 2020 sub-project. One PSA and two HAs were grouped under this CASP Online 2020 sub-project and are covered in another report.

Roles and responsibilities

- **Participating MSAs.** MSAs' active participation is essential for the success of the CASP project. They are the joint and final decision-makers for the PSAs when it comes to defining the sampling and testing plans, selecting the laboratories to perform the tests and approving the resulting test reports for the specific samples tested. MSAs conduct sampling in their national markets, perform RAs and adopt corrective actions when dangerous products are identified. In the HAs they are joint and final decision-makers when it comes to identifying the main needs and priorities. They provide input regarding the approaches and methodologies developed, in order to ensure that these are meaningful and also represent an added value to other authorities.
- **The European Innovation Council and SME Executive Agency (EISMEA).** EISMEA (the successor to CHAFEA – from 1 April 2021) acts as Contracting Authority. It manages the administrative relationship with EY–PRACSIS (the Contractor) on behalf of DG JUST, and monitors and approves all contractual deliverables.
- **DG JUST.** DG JUST oversees the planning and execution of the CASP projects and ensures their operational leadership, management and successful implementation. Additionally, DG JUST supports the participating MSAs by providing guidance and stimulating interactions.
- **Contractor.** The Contractor coordinates the implementation and logistical organisation of the activities, proposes and provides the technical experts for each of the activities and facilitates decision-making. The Contractor is responsible for reporting, communicating and disseminating the outcomes of the CASP 2020 project.
- **Technical experts.** The experts provide technical inputs throughout the project and offer guidance to the MSAs by developing the sampling and testing plans and assisting in the selection of the most suitable laboratories. They perform analyses of results, provide guidance in the assessment of the identified risks and propose recommendations.

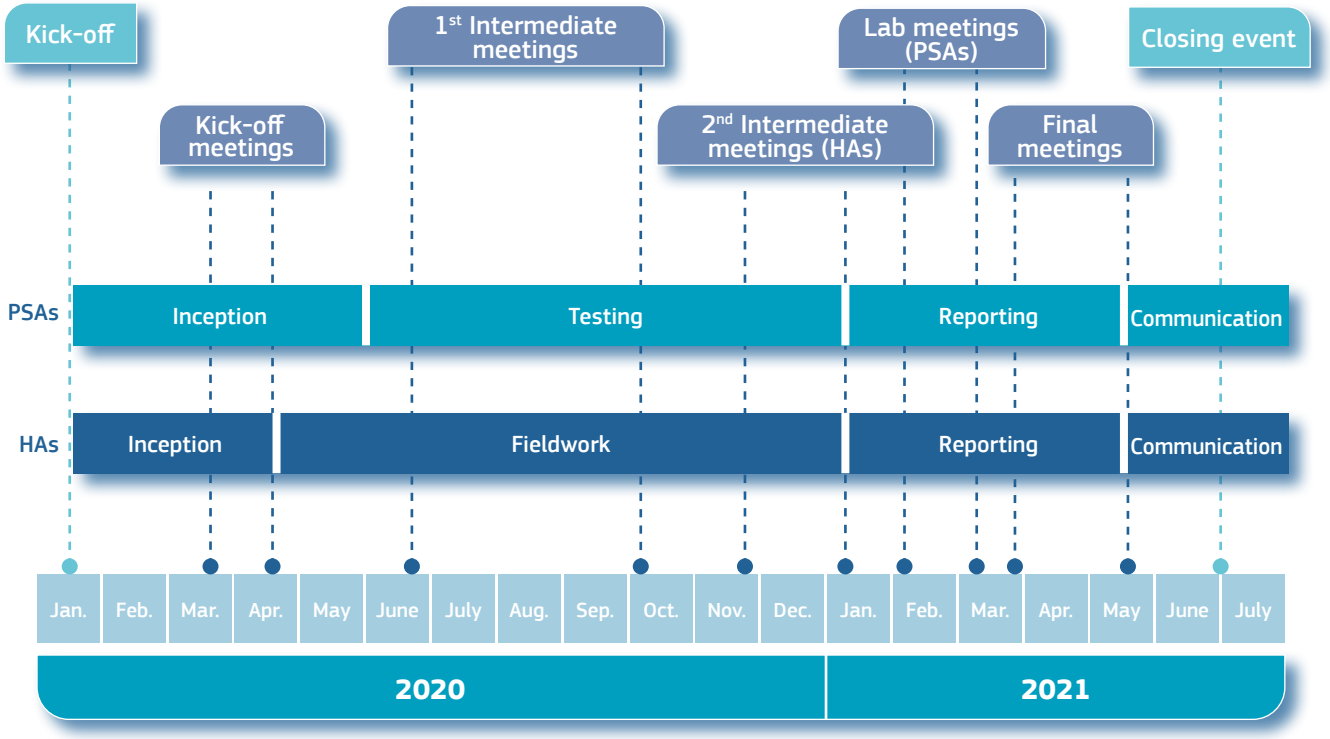
[5] In order to ensure consistency and relevance, the Child car seats PSA, which was launched as a separate project, was managed by the CASP 2020 project. As a result it is included in this CASP 2020 Final Report.

Timeline

PSAs were divided into four phases: inception, testing, reporting and communication. They all followed a harmonised approach and timeline.

Regarding the HAs, a specific approach was developed for each activity. However, all of them entailed four main phases: inception, fieldwork, reporting and communication.

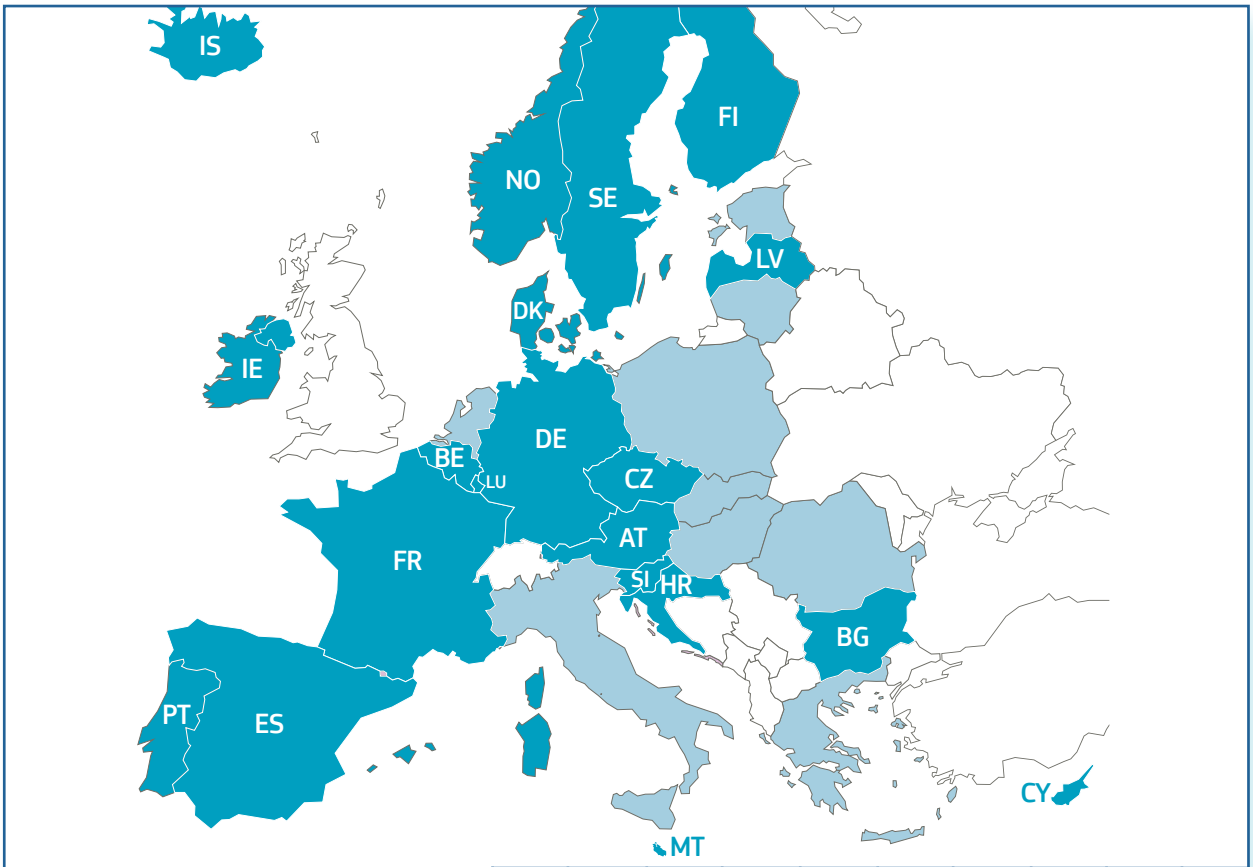
Figure 5 - PSAs and HAs, timeline



1.2 Participating MSAs

A total of 36 MSAs from 20 different EU/EEA MS participated in the CASP 2020 project.

Figure 6 - Map of participating MSAs



Country	MSA	Nitrosamines in toys	Home outdoor play equipment	Baby nests, bedside sleepers, sleep bags	Cables	Small kitchen heating appliances	Child car seats	Risk assessment	Cooperation with Customs	Recall effectiveness	EU injury and accident data collection system
Austria	Austrian Agency for Health and Food Safety (AGES)	X	X					X			
Austria	Federal Ministry of Social Affairs, Health, Care and Consumer Protection	X	X	X				X			X
Austria	Federal Ministry for Digital and Economic Affairs					X					
Belgium	Federal Public Service (FPS) Economy - Directorate-General for Quality and Security			X				X	X		X
Belgium	FPS Health, Food Chain Safety and Environment								X	X	
Belgium	FPS Finance – Customs and Excise								X		
Bulgaria	Commission for Consumer Protection			X			X				
Bulgaria	State Agency for Metrological and Technical Surveillance	X						X			
Bulgaria	National Customs Agency								X		
Croatia	State Inspectorate	X	X	X	X	X	X				
Cyprus	Consumer Protection Service, Ministry of Energy, Commerce and Industry	X	X								

Country	MSA	Nitrosamines in toys	Home outdoor play equipment	Baby nests, bedside sleepers, sleep bags	Cables	Small kitchen heating appliances	Child car seats	Risk assessment	Cooperation with Customs	Recall effectiveness	EU injury and accident data collection system
Cyprus	Department of Electrical and Mechanical Services – Ministry of Transport, Communication and Works				X	X					
Czech Republic	Czech Environmental Inspectorate								X		
Czech Republic	Czech Trade Inspection Authority	X				X		X	X	X	
Denmark	Danish Safety Technology Authority		X	X		X					
Finland	Finnish Safety and Chemicals Agency (Tukes)			X	X	X	X			X	
France	Directorate-General for Consumer Competition and Fraud Enforcement (DGCCRF)	X	X	X			X				
Germany	District Government of Arnsberg		X			X		X			
Germany	Ministry of the Environment, Climate Protection and the Energy Sector, Baden-Württemberg		X					X			
Germany	Bavarian Health and Food Safety Authority (LGL)	X									
Germany	State of Brandenburg (LAVG)				X						
Germany	District Government of Düsseldorf								X		
Germany	Department of Market Surveillance, Government of Upper Bavaria					X		X			
Iceland	The Consumer Agency – Neytendastofa	X	X	X			X	X	X	X	
Iceland	Iceland Revenue and Customs								X		
Ireland	Competition and Consumer Protection Commission (CCPC)			X				X	X		
Latvia	Consumer Rights Protection Centre								X	X	X
Luxembourg	Department of Market Surveillance (INLAS)			X			X	X	X		X
Malta	Malta Competition and Consumer Affairs Authority (MCCAA)	X		X	X	X	X	X	X	X	
Norway	Norwegian Environment Agency									X	
Norway	Norwegian Directorate for Civil Protection								X		
Portugal	Consumer Directorate-General (DGC)			X							
Slovenia	Market Inspectorate, Ministry of Economic Development and Technology				X						
Spain	Ministry of Consumer Affairs	X									
Sweden	Swedish Chemicals Agency	X									
Sweden	National Electrical Safety Board (Elsäkerhetsverket)				X	X					

2. PSAs: summaries of outcomes

2.1 Nitrosamines in toys

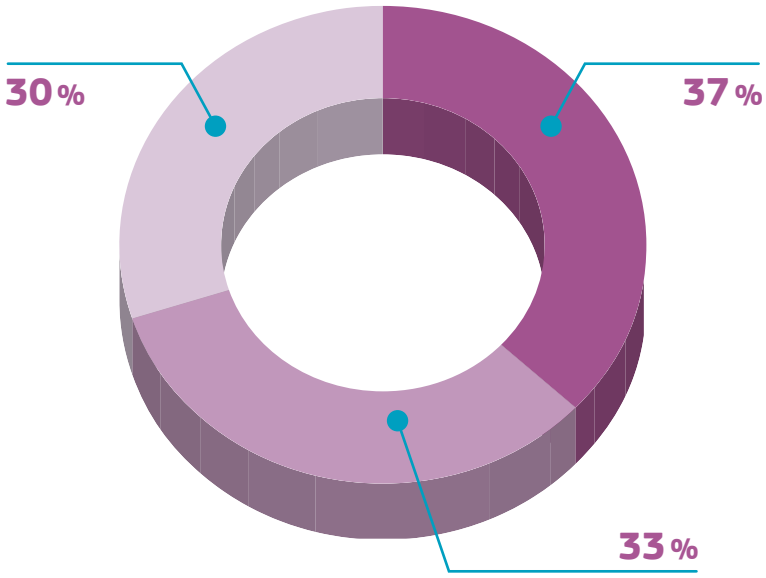
Nitrosamines and nitrosatable substances are a carcinogenic class of chemical compounds and, therefore, they are dangerous, especially if detected in toys for small children.

Product scope – Balloons, squeeze toys and finger paints





Total number of samples (N=220)

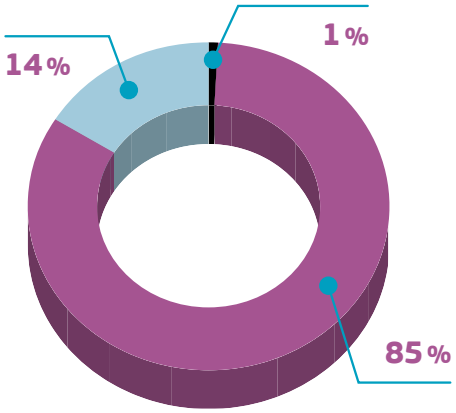


Summary of the testing results

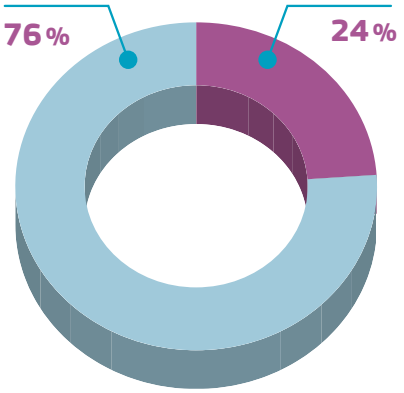
In total, 16% of the 220 products tested exceeded the limit values set in standard EN 71-12:2013 for nitrosamines and/or nitrosatable substances. Eight samples of balloons exceeded the limit values for both substances. Only 24% of the samples met the labelling and warnings requirements. The percentage of balloons that did not meet the chemical requirements (33%) was significantly higher than that of finger paints (9%) and squeeze toys (3%).

Overall test results and test results per product category

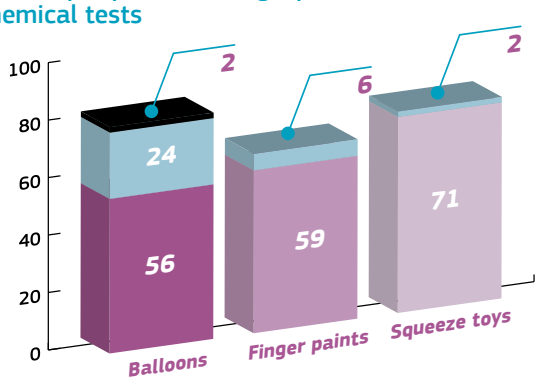
Results for chemical tests



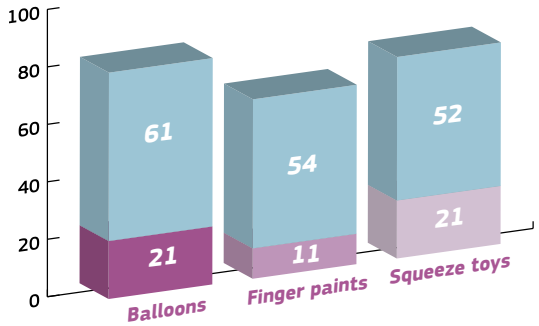
Results for labelling and warnings checks



Results per product category - chemical tests



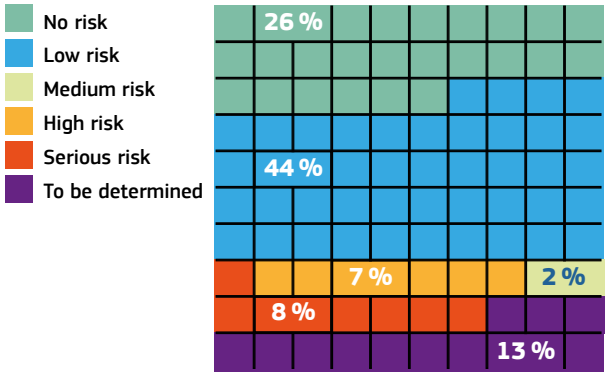
Results per product category - labelling and warnings checks



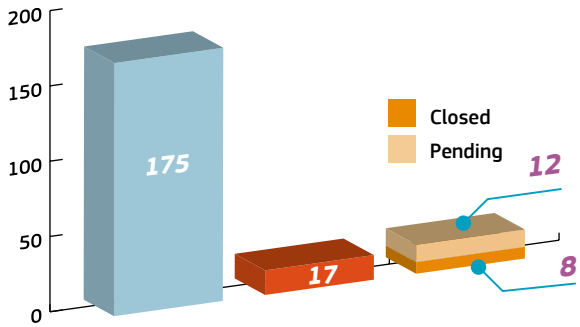
Met the requirements | Did not meet the requirements | Not homogeneous samples

Risks, measures and Safety Gate notifications[6]

Risk levels of products tested

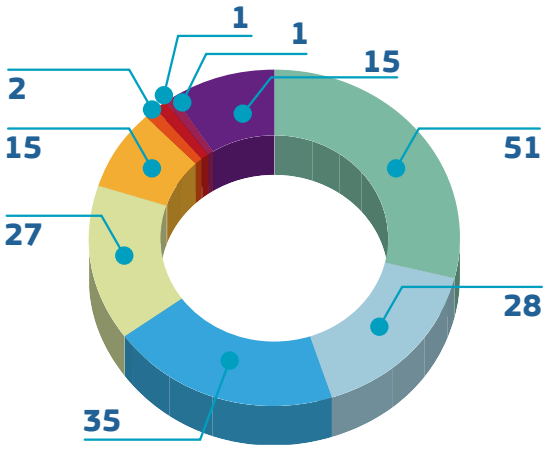


Impact of CASP 2020



No. of samples that did not meet the requirements
No. of serious risks
No. of Safety Gate notifications

Measures taken on samples that did not meet the testing requirements



No action on tested product
Informed responsible MSA
Informed EO
Improvements to the product or relabelling by EO
Withdrawal
Recall
Compulsory destruction of stock
Punitive sanctions against the EO
To be determined

[6] Based on the publicly available data in Safety Gate and notifications (up to 1 May 2021).

2.2 Home outdoor play equipment

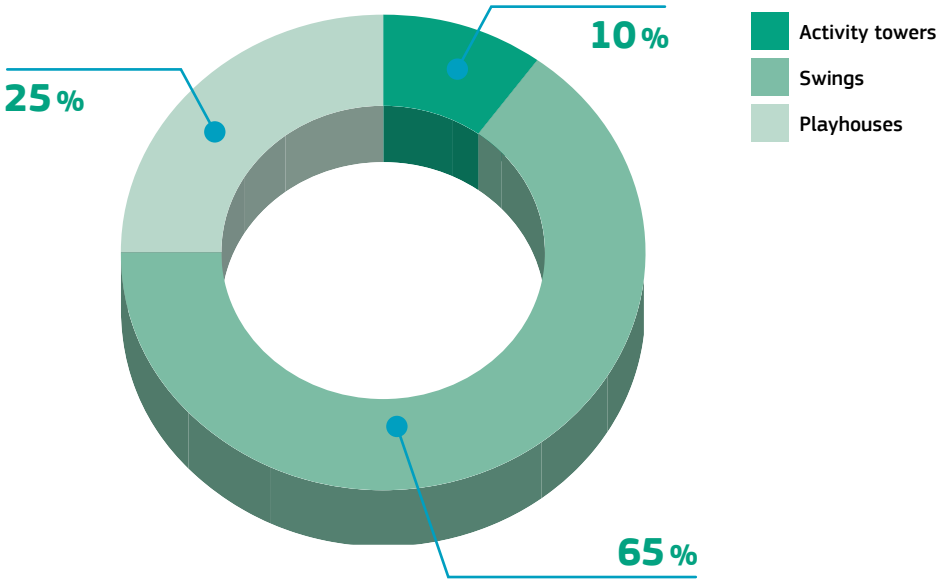
Activity toys are becoming increasingly popular on the European market. However, the use of such products and their incorrect assembly and installation present several risks for children when playing, such as entrapment, strangulation, dislocation, or falling from the equipment.

Product scope – Activity towers, swings and playhouses





Total number of samples (N=61)

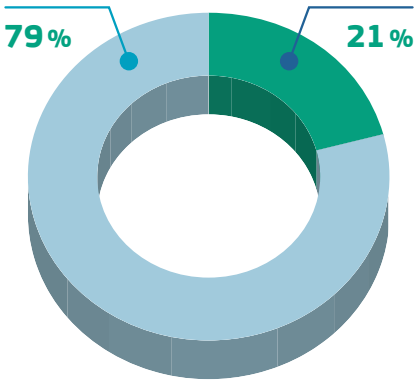


Summary of the testing results

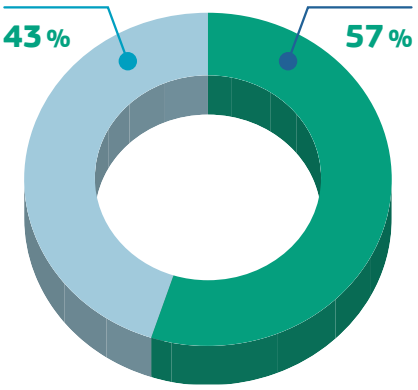
In total, 79% of the 61 products tested did not meet at least one of the requirements of the applicable standards as defined in the testing plan. However, if the requirements regarding labelling and instructions are excluded from the statistics, the percentage of samples that did not meet the requirements (for the mechanical, physical and flammability tests) decreases considerably (from 79% to 43%).

Overall test results and test results per product category

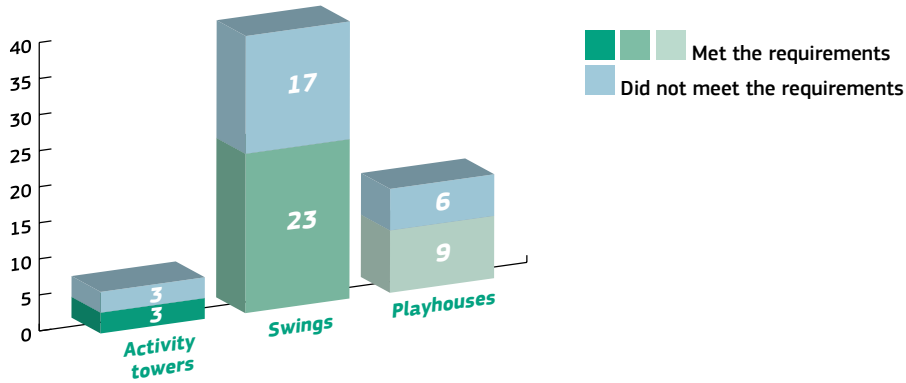
Overall test results



Overall test results excluding warnings, markings and instructions checks

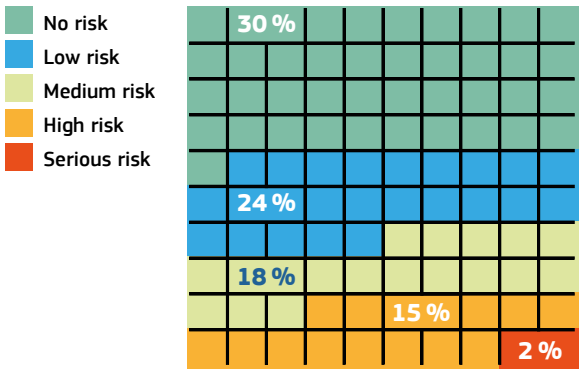


Results per product category excluding warnings, markings and instructions

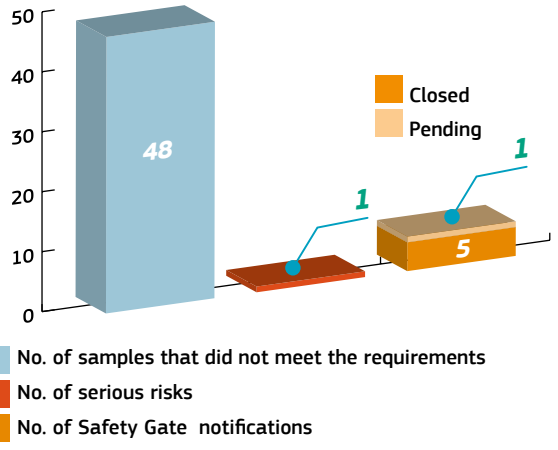


Risks, measures and Safety Gate notifications[7]

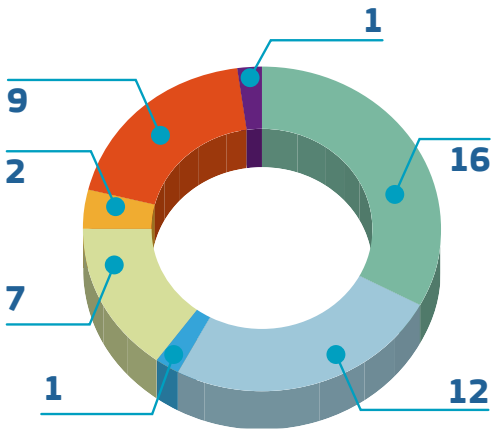
Risk levels of products tested



Impact of CASP 2020



Measures taken on samples that did not meet the testing requirements



[7] Based on the publicly available data in Safety Gate and notifications (up to 1 May 2021).

2.3 Baby nests, bedside sleepers, sleep bags

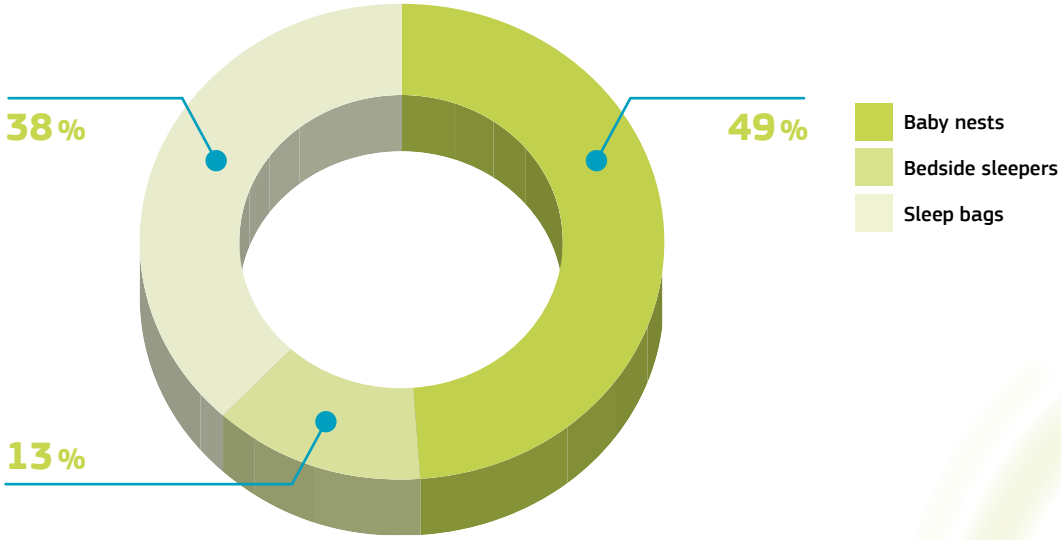
Baby nests, bedside sleepers and sleep bags are relatively new and very popular products that offer portable and flexible solutions not often provided by more traditional products. Considering the vulnerability of the end-users – children of a very young age – and the importance of ensuring safe sleep conditions, the MSAs expressed an interest in focusing on these products.

Product scope – Baby nests, bedside sleepers, sleep bags





Total number of samples (N=60)

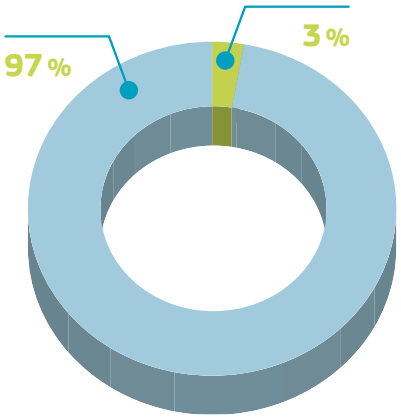


Summary of the testing results

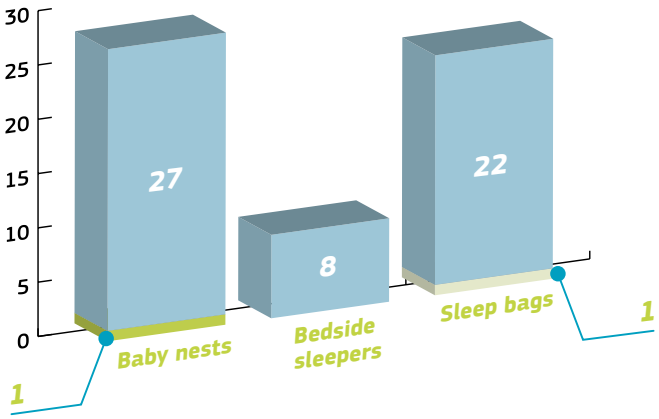
In total, 97% of the 60 samples tested did not meet at least one requirement of the relevant clauses of the applicable standards or, in the case of the Baby nest product category, of the standards identified as appropriate. Only one sleep bag and one baby nest met all the requirements identified in the testing plans. For baby nests, where no specifically designed safety standard exists, meeting the requirements does not necessarily imply that the safety of the product has been established.

Overall test results and test results per product category

Overall results



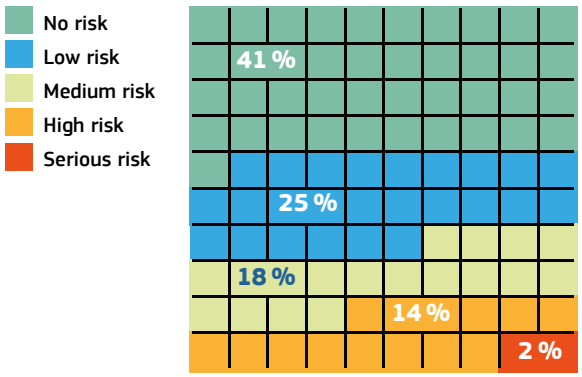
Results per product type



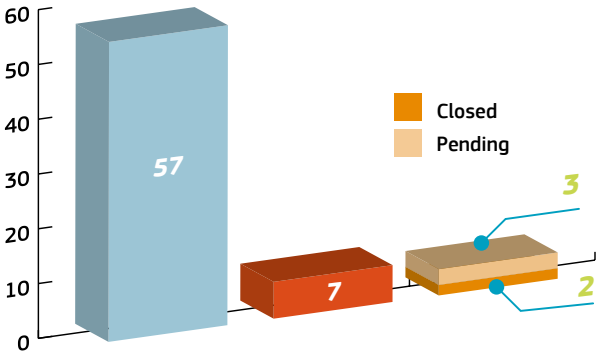
Met the requirements Did not meet the requirements

Risks, measures and Safety Gate notifications[8]

Risk levels of products tested

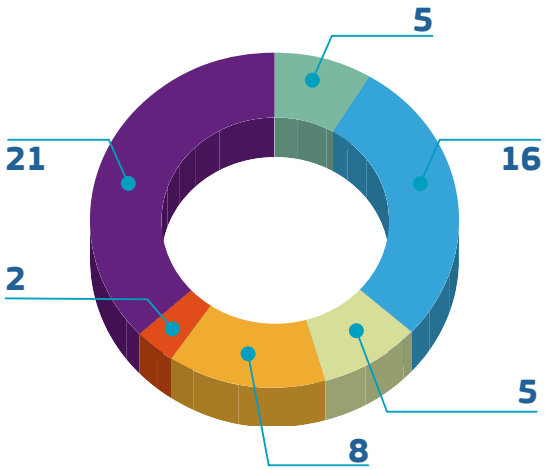


Impact of CASP 2020



No. of samples that did not meet the requirements
No. of serious risks
No. of Safety Gate notifications

Measures taken on samples that did not meet the testing requirements



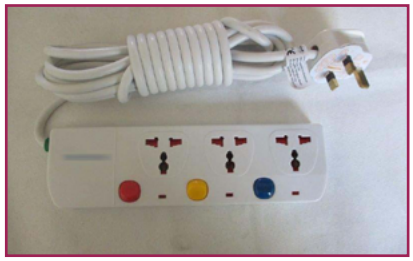
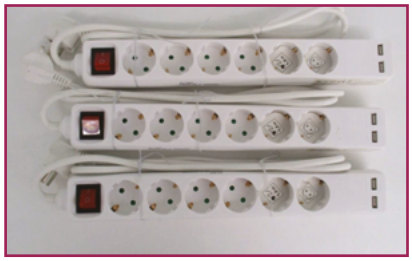
No action on tested product
Informed EO
Improvements to the product or relabelling by EO
Withdrawal
Recall
To be determined

[8] Based on the publicly available data in Safety Gate and notifications (up to 1 May 2021).

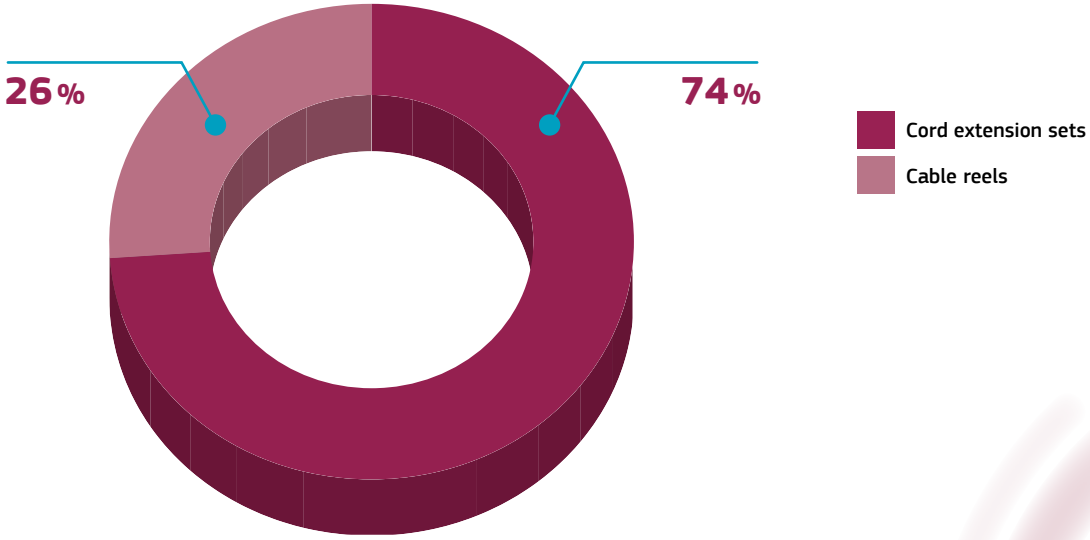
2.4 Cables

Extension cables are used to plug in different electrical appliances both indoors and outdoors when there are not enough fixed socket outlets, or if they are not conveniently located. The use of these cables has increased in recent years as consumers use more and more electrical appliances at home. Extension cables however carry risks related to overheating and electric shock.

Product scope – Extension cord sets and cable reels


Total number of samples (N=70)

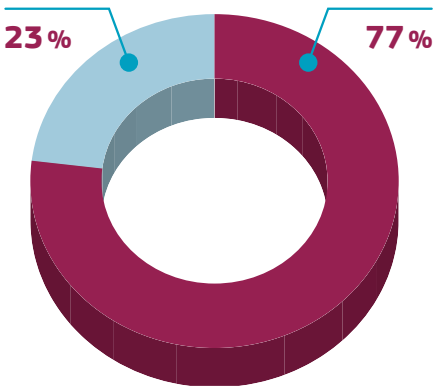


Summary of the testing results

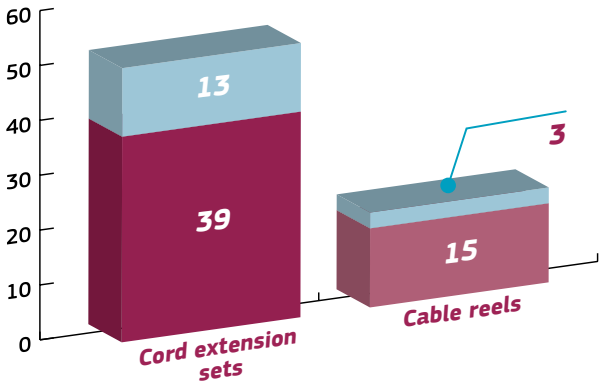
Out of the 70 samples tested, 23% did not meet the requirements of at least one of the clauses of the relevant standards. Cord extension sets presented a higher number of products that did not meet the requirements; the majority of defects were linked to the resistance of the insulating material to heat, fire and tracking.

Overall test results and test results per product category

Overall results



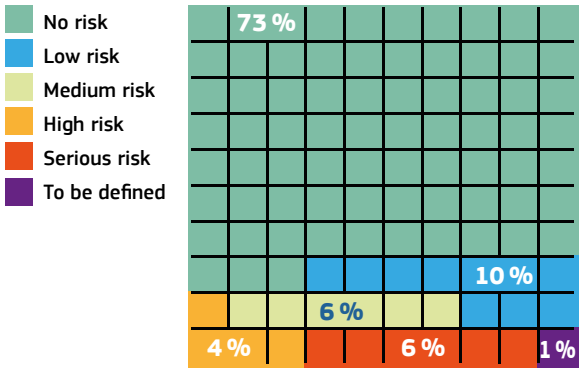
Results per product type



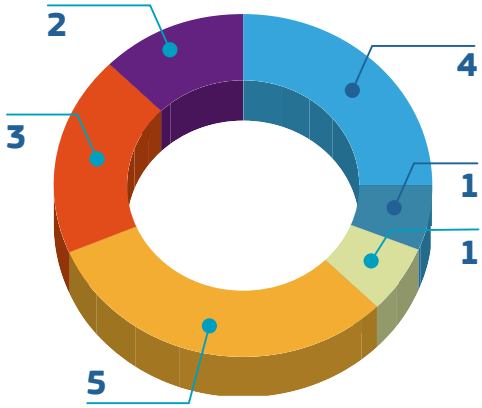
Met the requirements Did not meet the requirements

Risks, measures and Safety Gate notifications[9]

Risk levels of products tested

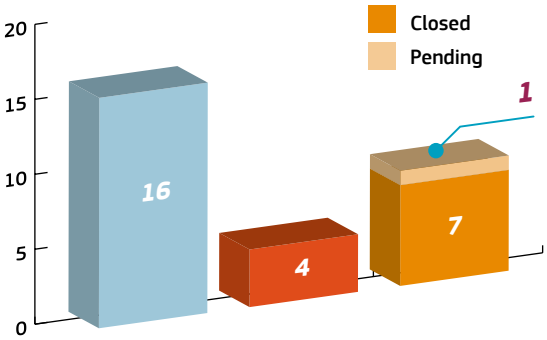


Measures taken on samples that did not meet the testing requirements



Informed EO
Sales ban
Improvements to the product or relabelling by EO
Withdrawal
Recall
To be determined

Impact of CASP 2020



No. of samples that did not meet the requirements
No. of serious risks
No. of Safety Gate notifications

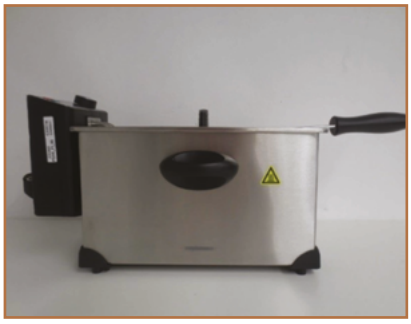
[9] Based on the publicly available data in Safety Gate and notifications (up to 1 May 2021).

2.5 Small kitchen heating appliances

Small kitchen heating appliances are used extensively by European consumers in their everyday lives. These appliances inevitably include at least some part that produces high temperatures in order to function, and if they are not used properly or if they are poorly manufactured, they can cause burns, fires and even electric shocks.

Product scope – Mini ovens, deep fat fryers, contact grills or waffle irons, and toasters

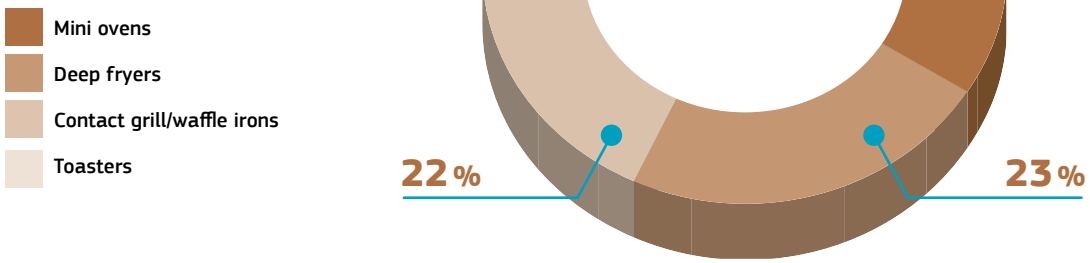








Total number of samples (N=89)

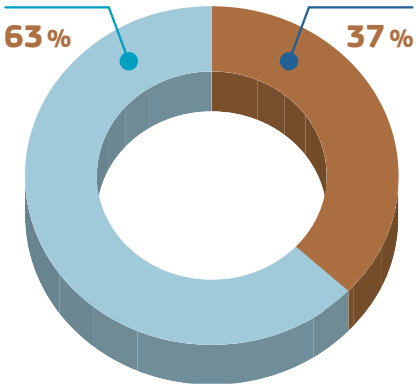


Summary of the testing results

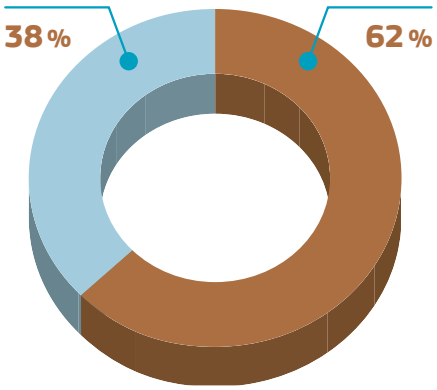
A total of 38% of the 89 products tested did not meet the requirements of the relevant clauses of the applicable standards (excluding markings and instructions). In addition, more than half of the products (56%) did not meet the requirements on markings and instructions. The defect rate for mini ovens is significantly higher than the defect rate for the other three product categories.

Overall test results and test results per product category

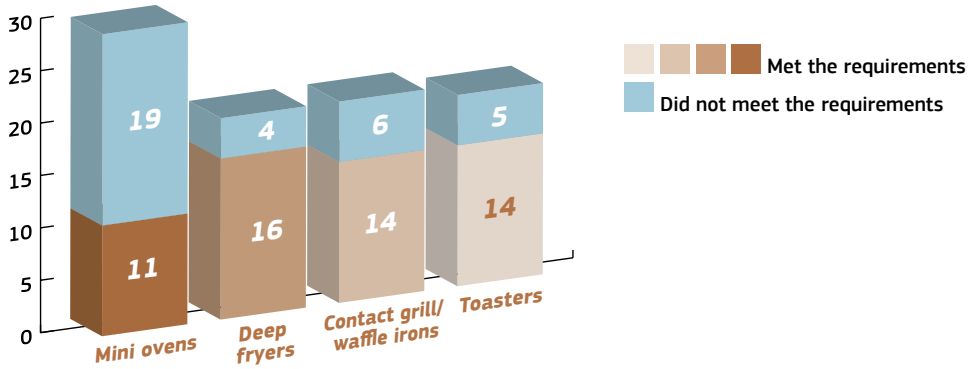
Overall results



Overall results excluding markings and instructions

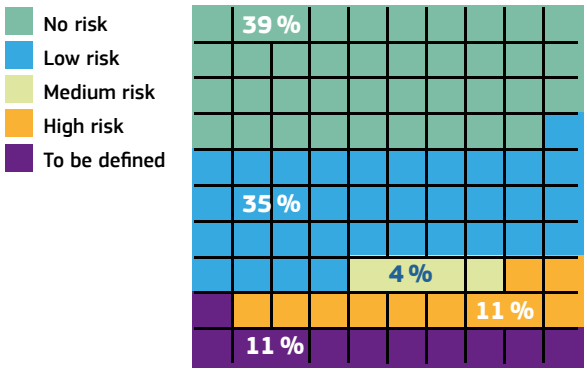


Results by product type excluding markings and instructions

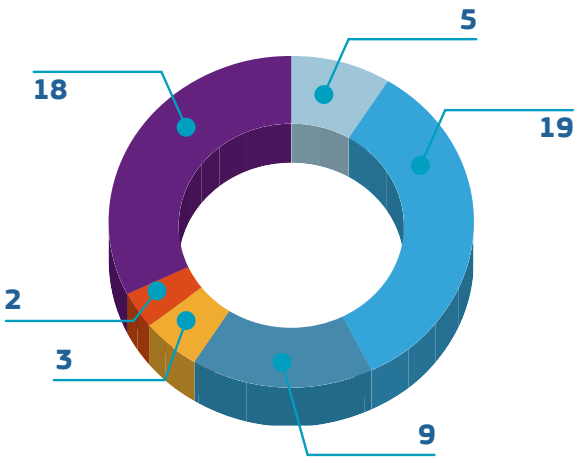


Risks, measures and Safety Gate notifications[10]

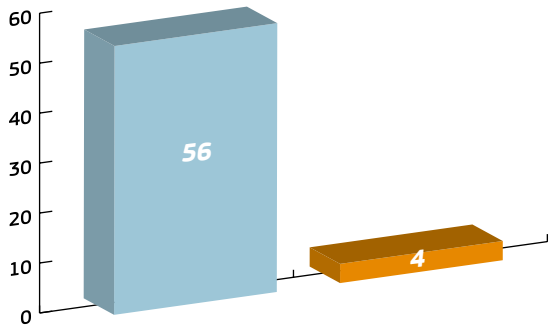
Risk levels of products tested



Measures taken on samples that did not meet the testing requirements



Impact of CASP 2020



[10] Based on the publicly available data in Safety Gate and notifications (up to 1 May 2021).

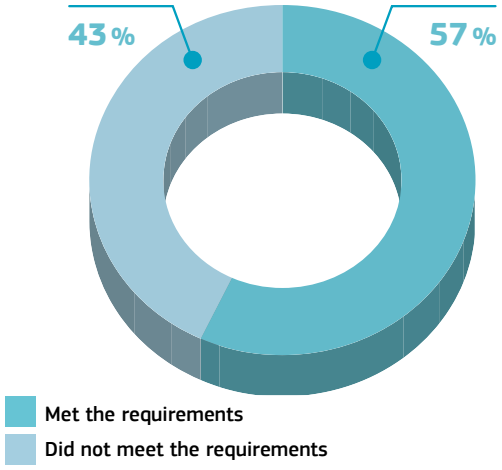
2.6 Child car seats

Child car seats increase the safety of children while they are travelling in a car. Thanks to their compulsory use in the EU, the number of children killed in road accidents has significantly decreased over the years. Despite this improved trend, road crashes are still the most common cause of death for children, that is why MSAs decided to focus on this product category in CASP 2020.

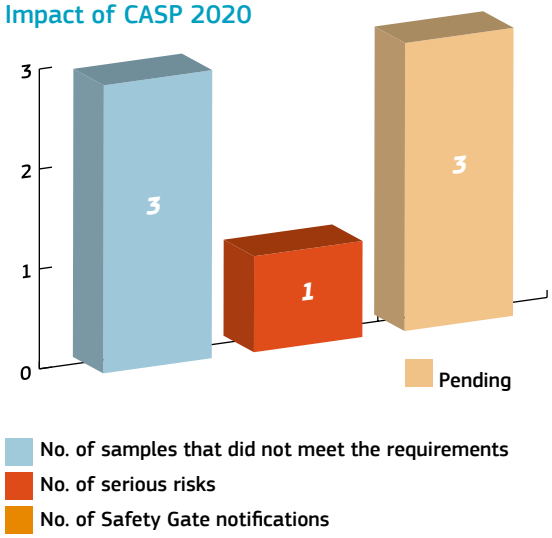
Product scope – Car seats for children aged 0 to 4 years



Overall test results (N=7)

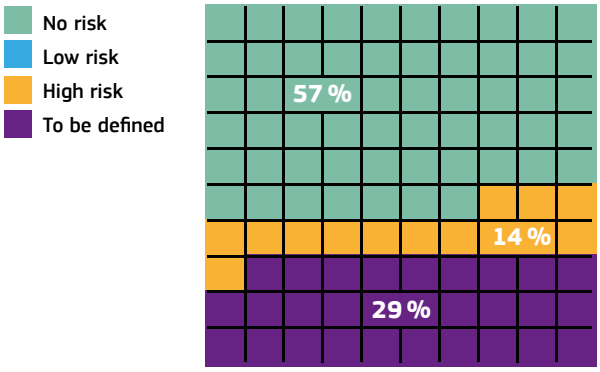


Impact of CASP 2020

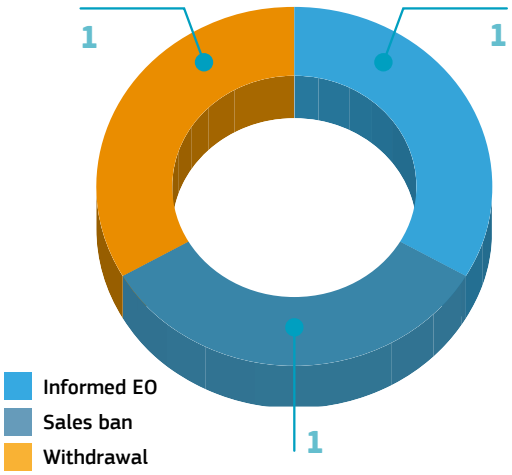


Risks, measures and Safety Gate notifications[11]

Overall test results



Measures taken on samples that did not meet the testing requirements



Summary of the testing results

Of the seven tested samples, three did not meet the requirements of the clauses of the relevant standards included in the testing plan. These clauses relate to dynamic tests and markings. The fact that three seats did not meet the requirements for dynamic tests means that they would not properly protect children from injury during impact. Moreover, insufficient markings may lead to the seats being fitted incorrectly, which significantly decreases the protection provided to the child.

[11] Based on the publicly available data in Safety Gate and notifications (up to 1 May 2021).

3. HAs: summaries of outcomes

3.1 Risk assessment

The RA activity in CASP 2020 focused on further harmonising RA and risk management across EU/EEA MSAs (as shown below).

Context

According to the General Product Safety Directive (2001/95/EC), a product has to be safe during its foreseeable use throughout its whole life. Therefore, when assessing whether a product poses a risk, the approach must be based on the harmonised and reproducible RA principles laid down in the Safety Gate guidelines.

Objectives

Increase consistency in the RA and risk management of non-food consumer products across EU/EEA MSAs by exchanging views and best practices. Create guidelines.

Process

- MSAs solved various cases and practical exercises related to the estimation of probabilities and risk management during the activity. The exercises allowed concrete challenges and best practices related to RA and risk management to be discussed. The discussions helped to explore those areas where more guidance was needed. Based on the outcomes, guidelines were drafted that could be used by all EU/EEA MSAs.
- MSAs prepared RA templates based on test reports and discussed difficulties together. By focusing on the products in the scope of CASP 2020, it allowed participants to develop scenarios on real cases and, as a consequence, to create synergies between the RA activity and the PSA. When the timelines allowed, RA templates developed within the RA activity were used during the RA sessions organised during the laboratory meetings of the PSA.

Outputs

- **RA templates for products in the scope of CASP 2020**

  Participating MSAs developed RA templates for the CASP 2020 PSAs based on the test reports that were made available during the project. The templates were uploaded to the RAG tool's library. These templates contribute to the harmonisation of RAs across the EU/EEA by allowing MSAs to access pre-drafted templates for various products.

- **Guidance document on the estimation of probabilities**

  Allocating probability values when developing injury scenarios is challenging due to the lack of directly applicable data on injuries associated with products and risks. The guidance document offers advice on which data sources to use when there is a lack of data on how to make reasonable assumptions about probabilities, and on how to verify these probabilities. The guidance also contains a number of examples for various product categories, helping MSAs to prepare estimations.

- **Guidance document laying down the principles of sound risk management**

  The guidance document provides decision-making advice to MSAs on which factors to take into consideration when deciding on corrective measures, on the different types of measures and their impact, and on how to determine the success and effectiveness of various corrective actions.

3.2 Cooperation with customs

The objective of the HA on cooperation with customs authorities was to enhance the cooperation between MSAs and customs authorities and the effectiveness of product safety controls for imported products. As well as MSAs, customs authorities were invited to participate in this activity, allowing for a valuable exchange of views and experiences from both sides.

Context

An effective and efficient collaboration between MSAs and customs is essential to guarantee that products entering the Single Market are safe. Collaboration procedures are numerous, and vary greatly across MS. For this reason, it is difficult to develop a single common process that would work for everyone. Nevertheless, good practices and tips and tools can be identified in order to draft some general guidelines that can be easily implemented to better structure the relationship between these authorities and improve cooperation.

Objectives

The objectives of this activity were: to assess the current situation in terms of cooperation between MSAs and customs; identify the outstanding needs, existing gaps and challenges as well as potential opportunities for synergies; and develop a general standard for collaboration as well as guidelines and good practices for fostering cooperation.

Process

The analysis on the needs, gaps and challenges was performed first and was then used to guide the development of the most appropriate tips and tools, as well as the guidelines and good practices for cooperation (which were developed in parallel). The analyses were further enriched with feedback from the MSAs.

Discussions with MSAs and customs authorities highlighted the importance of having a strong collaboration in place and the need to further structure, formalise and enhance this cooperation. The activity contributed to this goal by delivering a compilation of guidelines and good practices, as well as tips and tools for collaboration, that can be immediately implemented and put to use.

Outputs

- **Guidelines and good practices, which include:**
  - an overview of the key needs, gaps and challenges in the current framework of cooperation between MSAs and customs;
  - a common baseline MoU template detailing the key elements that should be included in any agreement for cooperation between MSAs and customs;
  - proposals for three joint training plans, to be delivered outside the framework of CASP 2020, to strengthen cooperation between the two authorities by focusing on: 1) visual inspection and documentation; 2) unsafe and counterfeit products; 3) customs codes and Safety Gate.
- **Tips and tools for collaboration**

  A general standard establishing common and generic quality and performance criteria for cooperation between MSAs and customs, including two ready-to-use electronic publications on hand sanitisers and face masks.

3.3 Recall effectiveness

When a product is identified as dangerous, businesses are obliged by EU law to take specific measures, depending on the risk level among other things. When other measures do not adequately reduce the risks involved, recalling products that have already been supplied or made available to consumers is necessary. The HA on recall effectiveness focused on solidifying product recall insights to be used by MSAs and EOs. It did so by developing a recall guide, and by producing infographics on recalls and registration and a generic recall template aimed at successfully reaching out to consumers.



Context

Organising a recall is a complex process that requires up-front, built-in procedural aspects, entails important communication and behavioural insights and requires multiple parties to work together. Some of the major challenges related to recall effectiveness include reaching consumers, increasing consumer response rates and motivating all parties to do their part.



Objectives

Elaborating the A–Z Recall Guide (both for MSAs and for EOs), gathering and sharing best practices on recalls, and developing 'tools' (infographics) to successfully reach out to consumers when recalling.



Process

In parallel, awareness-raising infographics, a generic recalls template and a recall guide were developed in an iterative process, allowing MSAs to contribute by providing feedback and input based on their own experience.

The activity and its deliverables also capitalised on behavioural insights, following scientific research commissioned by the EC.

The infographics are part of a larger communications toolkit that was developed during the HA on information campaigns (part of the CASP Online 2020 project).



Outputs

- **A–Z Recall Guide**

  The guide contains relevant background information and insights on recalls, as well as practical advice and best practices that can be used by MSAs and EOs.

- **Infographics on recalls**

  The infographics serve to inform consumers and motivate them to participate in the recall process. The infographics focus on the following topics:

  1) recalls of toys;

  2) encouraging registration of purchases;

  3) checking for product recalls.

  The infographic on recalls of toys was used during the activity itself, in an awareness-raising campaign over the 2020 Christmas/end-of-year period.

- **Template for recalls**

  - The EU recalls template. The template can be used to launch a product recall as it includes the relevant information fields that should be communicated. The content of the template was developed within the CASP 2020 Recall effectiveness HA and was further adapted so it could be included in the communications toolkit developed during the HA on information campaigns (part of CASP Online 2020).
  - Templates for social media posts for recall actions. These templates can increase the outreach of a product recall notification. Information on the specific product being recalled can be simply included in the template.

3.4 EU injury and accident data collection system

The HA on an EU injury and accident data collection system focused on exploring and assessing the feasibilities and modalities of establishing an EU-wide database regarding injuries and accidents.

Context

Data on injuries and accidents caused by unsafe products is currently collected in a fragmented and inconsistent manner across EU MS. Making this type of data available and easy to compare can benefit MSAs by helping them to develop RAs, prioritise activities, identify dangerous products, reduce the cost of injuries, and most importantly, prevent injuries and save the lives of European citizens.

Objectives

Explore the feasibility and possible modalities of an EU-wide injury and accident data collection system and identify a preferred option.

Process

Desk research and scoping interviews on existing databases led to insightful background information. In consultation with the MSAs, four possible scenarios were developed and investigated using a multi-criteria decision analysis. Based on this, conclusions were drawn on the ideal scenario and on the next steps for moving towards implementing this ideal scenario.

Outputs

'Study on the feasibility and modalities of an EU Injury and Accident Data Collection System'

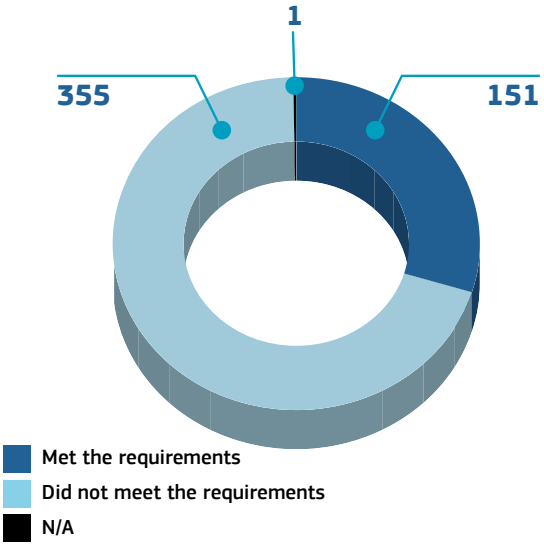
The study concludes that, when setting up an injury and accident database, combining already existing databases (leveraging past efforts) and, in addition, either building on an existing injury database or developing a new database would be the recommended option. Further investigation should mainly focus on the technicalities of such a database, on General Data Protection Regulation (EU) 2016/679 restrictions/implications and on the buy-in of stakeholders (e.g. hospitals) in order to guarantee the sustainability of the data collection system.

4. Conclusions

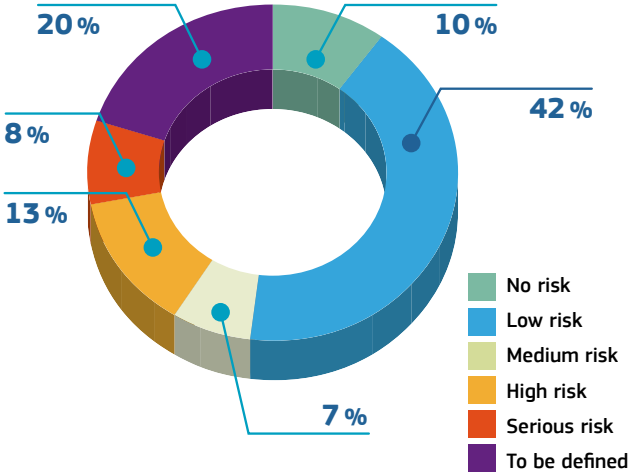
4.1 General conclusions

Concerning the PSAs, the overall results show that the priority setting exercise performed prior to the launch of the project was successful in identifying product categories that demand further attention in terms of market surveillance. As a matter of fact, 355 out of the 507 products tested did not meet at least one of the requirements identified in the testing plans. Among those, 30 products were assessed as posing serious risks, 47 were high risk, 26 medium risk and 148 low risk. The MSAs adopted the necessary measures based on the RAs performed and a total of 26 products were notified in the Safety Gate portal in order to share the relevant information with other MSAs, consumers and EOs[12].

Overall results across all PSAs (N=507)



Overview of risk levels of the samples that did not meet the requirements across all PSAs (N=355)



The HAs were successful at fostering stronger coordination in terms of developing specific tools and guidelines as well as increasing common knowledge on market surveillance-related topics. As a result of the RA HA, MSAs exchanged views on various RA and management topics and, together with the technical expert, prepared guidance documents that can be used by all EU/EEA MSAs. The Cooperation with customs HA allowed MSAs to explore their current forms of cooperation and identify areas that might enhance their collaboration in order to intercept more dangerous products at the border. The guidelines and tips and tools that were developed can contribute to the strengthening of the cooperation between MSAs and customs authorities, but can also encourage them to continue exploring challenges and solutions. The Recall effectiveness HA contributed to a better understanding of the challenges associated with product recalls and also to the preparation of a recall guide for EOs (which can serve as a reference point for all EU MS). The HA on an EU injury and accident data collection system focused on exploring and assessing the feasibilities and modalities of establishing an EU-wide database regarding injuries and accidents. Participating MSAs and the technical expert found that the benefits of setting up such a database would exceed the costs and recommended a roadmap for future actions.

The overall results of a CASP project are, however, not just a simple sum of the results of the individual activities. CASP projects allow different activities to be combined, and seek out complementary elements and synergies between the different activities. By combining different PSAs, the project benefits from economies of scale. The overall testing budget allocated to the full project can be distributed most efficiently across the different PSAs, allowing budgets to be adapted according to the actual testing costs of each product, while maintaining a large enough number of tested samples for each MSA in each PSA. The benefits of combining different PSAs also goes beyond the financial. In applying a timeline and an overall common methodology, MSAs can work together more closely across different sectors; findings from one PSA can be important when discussing the results of

[12] Reported results are based on the information available on 1 May 2021. The category 'to be defined' refers to cases where measures have not yet been determined.

another. A good example of this is the development of a common approach to RAs for products that do not meet labelling and marking requirements. While risks linked to faulty or missing labelling and markings might differ between products, exchanges during the different PSAs showed that some similarities in how to approach this can be applied.

The HA activities within CASP are important for expanding this meaningful exchange of ideas and best practices beyond the level of specific product categories. During the CASP 2020 project and the CASP Online 2020 sub-project, the HAs not only focused on developing common approaches, guidelines and practical tools, they also actively exploited synergies with all the other activities, setting the ground for further developments.

- The relevance of developing common RA methodologies is obvious. The results of the RA activity were applied to the RAs conducted within the framework of the PSAs.
- Also, the 'Study on the feasibility of an EU Injury and Accident Data Collection System' is valuable as it focuses on an important element that was generally identified within the PSAs: the need for accident data (currently missing) to conduct well established evidence-based RAs.
- Discussions on cooperation between MSAs and customs authorities allowed concrete needs and challenges to be identified and tools and best practices that can be deployed by all MSAs to be developed. The work done within this HA does not only answer concerns raised within the CASP 2020 PSA (such as how to work more closely with customs authorities to sample products before they enter the European Single Market), but has also provided some insights that can be built into the CASP 2021 project, where a dedicated activity on counterfeit products requires close cooperation between customs and MSAs.
- Finally, concrete synergies were also developed between the Recall effectiveness and Information campaigns HAs (part of CASP Online 2020), which allowed for the co-development of a full, ready-to-use communications toolkit for MSAs to use when a recall campaign needs to be deployed.

The CASP 2020 project brings together a wealth of data on product testing and insights on market surveillance, and includes them in guidelines, tools and reports. Insights collected through the CASP 2020 activities are not only useful for MSAs, they are also directly relevant to consumers and EOs.
This report provided an overview of all the activities and the results of each of the activities included in CASP 2020. Further detailed information is provided in separate activity reports. Furthermore, a comprehensive communications toolkit has been produced in all EU languages, it focuses most strongly on the PSAs but also covers the HAs. All materials and reports are available on the dedicated CASP website (*https://ec.europa.eu/safety-gate/#/screen/pages/casp*).

4.2 Lessons learnt and applied in the project

- **Fully digital CASP project.** Due to Covid-19, CASP 2020 project was the first CASP project that had to be fully organised via digital means (including the laboratory meetings). Using digital tools allowed MSAs to contribute to project documents. More representatives per MSA could get involved in project meetings and there was no risk of having fewer exchanges of view on important product safety issues. In addition, as shown by the number of Safety Gate notifications, a positive impact was made and the coordinated activities were effective, helping to keep the EU Single Market safe. However, whenever possible, physical meetings are still recommended for main events, such as kick-off meetings, lab meetings and the closing event. Even though virtual meetings present several advantages in terms of logistics, and allow more representatives from the MSAs to take part, physical meetings provide a fruitful forum for further discussions and networking activities among participants.
- **Early reach out to laboratories.** The early mapping of eligible testing laboratories enabled the Contractor to collect initial price quotations, which allowed a realistic division of the testing budget among the PSAs and the effective use of resources by maximising the number of product samples to be tested.
- **Assessing the technical excellence of the testing laboratories.** In order to ensure that the testing laboratories had the necessary skills to perform high quality testing services and the necessary expertise, the Contractor and the technical expert had evaluation calls with all the laboratories that submitted an offer to carry out the testing. The outcomes of these calls were reported to the MSAs so they could make an informed decision on which laboratory to select.

4.3 Recommendations

The following recommendations are based on the outcomes of the activities and the discussions held among MSAs during the project. Specific recommendations for each activity can be found in the dedicated activity reports.

For consumers

- **Read the labelling, marking and instructions.** Labels and instructions always contain important information on how to use products correctly. Consumers should carefully read the warnings and follow the instructions, especially when using products that can get very hot, such as small kitchen heating appliances, or when assembling and installing products such as home outdoor play equipment or bedside sleepers, as injuries may occur if the products are not assembled or installed correctly. Consumers should always check if the product includes information on the manufacturer, as this may provide additional reassurance about its safety.
- **Regularly check Safety Gate.** Consumers should verify whether the products they are planning to purchase have been notified via Safety Gate. This could help to ensure that only safe products are bought. Additionally, consumers should report any safety incidents to the appropriate MSA(s).
- **Consumers should be aware of the importance of recalls.** It is advisable that consumers register their purchases so that they can check for any potential recalls and actively participate in recall actions (e.g. by returning products), to make sure their health and safety is not put at risk by dangerous products.

EOs

- **Meet all legal requirements.** EOs are responsible for the safety of the products they place on the European Single Market. EOs should ensure that their products meet the requirements set by the applicable European legislation. In order to make sure that only safe products are marketed to EU consumers, EOs should check new notifications on Safety Gate and ensure that any new products they place on the market are safe.
- **Meet requirements for labelling, marking and instructions.** EOs should not neglect these elements, which aim at providing essential information to consumers on how to correctly use/assemble the products. For certain products, such as the home outdoor play equipment and child car seats tested in CASP 2020, instructions are essential for proper assembly and use. The products should meet all the requirements on labelling, marking and instructions, which are expected to be clear, thorough and translated into the language of the country of sale.
- **Use the RAG[13].** The RAG tool managed by the EC is available to all EU/EEA authorities, and any other parties interested in performing RAs. EOs should use it to assess the risks potentially posed by their products and to ensure that only safe products are marketed to EU consumers.
- **Cooperate with MSAs to organise recalls.** EOs and MSAs should work together to organise and manage effective recalls, starting by informing consumers (in a way that takes best practices based on behavioural insights into consideration). If necessary, MSAs can guide EOs throughout the recall process.

[13] *https://ec.europa.eu/rag/#/screen/home*

For national authorities

- **Keep the sectors under surveillance.** A considerable number of products examined under the CASP 2020 project presented risks to consumers. Additionally, four PSAs (Nitrosamines in toys; Home outdoor play equipment; Baby nests, bedside sleepers, sleep bags; Child car seats) focused on products intended for small children, a vulnerable consumer category that requires careful and continued monitoring.
- **Issue notifications on Safety Gate.** MSAs are legally obliged to issue notifications on measures taken against products posing a serious risk. In addition, the Safety Gate guidelines also recommend issuing notifications on measures taken against products posing a less than serious risk. This is to ensure that the information is properly exchanged among authorities and to enhance awareness among EOs and consumers through the public Safety Gate website.
- **Engage with standardisation organisations to improve standards.** The outcomes of CASP 2020 may provide valuable input to the work conducted by standardisation organisations. MSAs (and the EC) should maintain continued dialogue with the relevant standardisation committees to improve existing safety standards or develop new ones (for the Baby nest product category, for example).
- **Expand the RAG tool's library.** In order to help EU/EEA authorities and other interested parties assess the risks posed by various products, MSAs should continue developing RA templates and expand the RAG tool's library in future coordinated activities.
- **Encourage close collaboration between customs authorities and MSAs.** Both MSAs and customs authorities are invited to further implement the good practices identified. MSAs and customs could benefit from MoU to officialise their collaboration, set targets, organise their cooperation and launch joint trainings.
- **Make use of the deliverables from CASP 2020 activities.** MSAs are encouraged to make use of all the results and insights that have been collected during the CASP 2020 project. Specific deliverables, such as the communications toolkit on recalls, the A-Z Guide on recalls or the guidelines on the estimation of probabilities, have been made available to all MSAs for use in their daily work.
- **Disseminate CASP 2020 results.** MSAs are encouraged to further disseminate the results and deliverables of the CASP 2020 project. MSAs are particularly encouraged to disseminate the communications material that was developed to maximise the impact and outreach of the project. Customs authorities are encouraged to do the same.

For European authorities

- **Consider following up on an EU-wide injury and accident data collection system,** taking account the cost–benefit ratio resulting from the 'Study on the feasibility and modalities of an EU Injury and Accident Data Collection System' developed during the CASP 2020 HA, and the willingness and capacity of the MSAs to collect data at national level.

EUROPEAN COMMISSION
Directorate-General for Justice and Consumers
Directorate Consumers
Unit E.4 Product Safety and Rapid Alert System
Email: *JUST-RAPEX@ec.europa.eu*

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