
4th European Colloquium
User-friendly Product Information
*Statement on the guideline on
behalf of manufacturers*

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Introduction of CECED

- CECED: Conseil européen de la construction électrodomestique
- Founded in 1958 and located in Brussels.
- Direct members and national associations.
- 200,000 employees, directly, and about 500,000 overall.
- 280 companies manufacturing 50,000,000 large appliances per year.



Background

- Project was partly funded by the European Commission.
- Limited industry participation during preparation of this guideline.
- This new guideline was published 02/2004.
- At the moment not much practical experience is gained for its application.

Standardization - General

- Standardization in the area of „Usable and safe operating manuals“ shall avoid new grounds for certification.
- Mandatory third-party certification is inappropriate and contradicts the economic interests of users and manufacturers.
- The Supplier’s Declaration of Conformity (SDoC) is the preferred option to demonstrate compliance with relevant requirements.

International Level (1)

- WTO emphasized that all requirements in national or regional standards shall be based on international standards (ISO/IEC).
- Fully functioning and efficiently working international standardization system is in place.
- Legal and regulatory context of ISO/IEC standard is clear.
- Participation of many Stakeholders in the standardization process.

International Level (2)

- IEC Guide 104: “The preparation of safety publications and the use of basic safety publications and group safety publications“.
- IEC Guide 108: “The relationship between Technical Committees with horizontal function and product committees and the use of basic publications“.
- ISO/IEC Guide 51: “Safety aspects - Guidelines for their inclusion in standards“.
- And others e.g. ISO/IEC Guide 71.

European Level (1)

- The Dresden and Vienna Agreements as essential fundamentals of standardization state that the basic publications for standard writers shall be identical at international and European level.
- The newly presented guideline may lead to trade barriers unless presented to ISO/IEC for consideration and reviewing of existing documents and guidelines.

European Level (2)

- This new guideline covers the same scope as the mandate M 292 “Mandate for a guidance document in the field of safety of consumers and children – product information“ assigned to CEN/CENELEC and ETSI.
- Obviously this situation is not satisfactory and better coordination is required to prevent double work.

Industry Level (1)

1. Reduce as much as possible all identified and reasonably foreseeable risks to a tolerable risk.
 2. Identify the remaining risk.
 3. Those remaining risks that cannot be prevented within the design stage they shall be covered by the user's manual in detail.
- All the above is already part of all New Approach Directives.
 - We as manufacturer place only safe products on the market.
 - GOAL: Inherent Safety Design
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Industry Level (2)

- IEC Guide 104, section 5.3.1
In specifying requirements intended to eliminate hazards and reduce risks, the following principles should be applied:
 - equipment should be inherently safe by design and construction;
 - where the above cannot be achieved, additional protective measures in relation to hazards should be specified;
 - if there are any risks not reduced to a tolerable level by the above means, it should be specified that users need to be informed of such risks. If there is need for any training or for the use of any personal protective equipment to reduce risks to a tolerable level, it should be specified that users need to be informed of this.

“Three-level” concept

- A-Level: ISO/IEC Guide 51.
- B-Level: Application of ISO/IEC Technical Reports.
- C-Level: Implementation of guidelines of the A/B - Levels in product standards, as far as appropriate and after thorough review.

Industrie's remaining questions

- What is the benefit of TCeurope's publication?
- What is the legal context and what significance and impact does it have?
- Why do the law cases in the "Example" mostly reflect the American point of view?
- Who is the target group of this guideline?
- How and where does this guideline fit into the existing world taking into account existing ISO/IEC guides and standards?

Opportunities for improvement (1)

- Accessibility is also relevant for other chapters.
- Scope of this document must be very clear (e.g. user-machine interfaces).
- This guideline is very complex and certainly not easy to use.
- Internationally agreed and established vocabulary with reference to standards (ISO/IEC) should be followed.

Opportunities for improvement (2)

Page 45, section 2.2.1 “Product Description“ under “Action point“ reads: “Provide information on the following point e.g. Declaration of Conformity (DoC), weights and measures, emissions, product variants, performance.“

- Reference is the Machinery Directive but the Low Voltage Directive doesn't call for such information!
- ↪ Over-regulation for other product areas would be the consequence in case you follow this guideline.

Opportunities for improvement (3)

- Double request for DoC (Section 2.2.1 “Product Description“ and Section 2.2.2 “Safety“).
- The “Tip“ in Section 2.2.2 “Safety“ reads “Conduct a risk analysis to determine hazards arising from product use and misuse“.
- If a product standard is available responsible Technical Committees performed such risk assessments already.

Opportunities for improvement (4)

- **Hazard** is defined as:
 - Potential source of harm (ISO/IEC Guide 51)
 - A source of danger that may lead to personal injuries or death and/or damages to property.
Also known as risk (TCeurope Guideline)
- **Risk** is defined in ISO/IEC Guide 51 as combination of the probability of occurrence of harm and the severity of that harm.

Special national conditions

- Even having a fully functioning standardization system in place then some countries do not necessarily follow.
- It is the national government's responsibility to establish and enforce laws.
- Example: Turkey requests e.g. a reference to Third Party with address, tel., fax, email in user's manual.

Conclusion

- This guideline could be introduced as a study or a report and the findings could be submitted to international standardization bodies (ISO/IEC).
 - Further consideration of this guideline within standards shall be made only at international level.
 - Since globalization is reality a special European way must be prevented to avoid trade barriers but rather follow WTO recommendations.
 - Content of this new guideline reflects the “State of the Art“ in most companies.
 - Double work must be prevented.
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Thank you for you attention!

Please contact me for any questions:

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