



***Raising standards for consumers***



**The Consumer Voice in Europe**

# A New General Product Safety Regulation

## Recommendations for the trilogue negotiations

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Ref: BEUC-X-2022-092 - 13/09/2022  
ANEC-WP1-2022-G-055

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Funded by the European Union

## Why it matters to consumers

Consumers have a fundamental right to safe products, regardless of whether they purchase these online or on the high street. Safety checks performed by consumer groups show however that dangerous products continue to be available due to loopholes in both the EU's legal framework and enforcement mechanisms.

A stronger and better General Product Safety Regulation (GPSR) is part of a bigger regulatory set of rules which needs to address the obligations of economic operators in globalised supply chains, and regarding new technological developments such as cybersecurity.

While some progress has been made in negotiating a new legal text, important weaknesses and loopholes remain, depriving consumers from the safety net they urgently need to confidently purchase new products.

## Summary

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In autumn 2022, the European institutions will negotiate the final text for a new General Product Safety Regulation. Among the strong points in the Commission's proposal were more modern market surveillance rules, broader criteria for risk assessment, improved traceability along the supply chain, giving consumers new rights in case of product recalls and initiatives to improve international cooperation.

The amendments proposed by the co-legislators to the Commission's proposal so far can bring several improvements from a consumer perspective, for example better provisions on remedies in case of product recalls.

However, there are also aspects of concern, notably the fact that loopholes on regulating online marketplaces will continue to exist, which will significantly lower the level of protection.

As we enter the final legislative stage, BEUC calls on legislators to go the extra mile to ensure that consumers benefit from a truly high level of protection when shopping for products. To this end, we make a number of recommendations.

Most importantly we recommend keeping the precautionary principle in the scope of the regulation, getting obligations of economic operators including online marketplaces right and ensuring a strong enforcement system as well as a short transition time to the new Regulation.

We provide an overview table with comments per relevant article.

### Introduction

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With the [proposal for a new General Product Safety Regulation](#), the European Commission intends to update this important consumer legislation to respond to challenges of new technologies such as connected products and global trade.

There are some good suggestions from the [Council](#) and the [European Parliament](#) which can improve the text. However, overall, we are concerned that:

- Not enough is being done to close regulatory loopholes related to third party vendors on online marketplaces.
- Regulators have differentiating views on crucial points, such as the role of the precautionary principle – which may lead to undesirable outcomes.
- Several crucial points of importance to consumer safety have been neglected by all three regulators, such as the need to set up a pan-European accident and injury database, and to require mandatory independent third-party testing for specific product groups.

As of September 2022, there will be inter-institutional negotiations ('trilogues') with the goal to come to a final agreement by the end of 2022. In this paper we will give additional recommendations to policymakers on the Regulation.

## Summary table article by article

Article	BEUC recommendation
<b>Recitals</b>	<p>(6) support Parliament's approach to the safety net function of the GPSR</p> <p>(8a) support Council's reference to the Union's Customs code which clarifies that consumer products for free release must comply with this Regulation and in particular the general safety requirement.</p> <p>(10) Support Council's proposal to reinforce the precautionary principle</p>
<b>1- Subject matter</b>	<p>Support Parliament's idea to clarify the objective of the GPSR.</p> <p>Reject deleting references to the "placing on the market" (both in the introductory sentence of this article and throughout the text of the proposal).</p> <p>Support Council's proposal to extend the scope beyond consumer products.</p>
<b>2- Scope</b>	<p>reject Parliament's proposal to delete the precautionary principle and to limit it to market surveillance only</p> <p>reject Parliament's proposal to delete recital 11 which makes a broad reference to health and safety.</p>
<b>- Definitions</b>	<p>1) Product: Support Council's proposal</p> <p>2) Safe product: Support Commission's proposal</p> <p>3) Authorised representative: Support Council's proposal</p> <p>3) Economic operator: include online marketplaces</p> <p>4) Online marketplaces: see definition in Omnibus directive</p> <p>5b) Trader: Support Council's proposal</p> <p>reject EP's proposal in Amendment 10 to delete reference to the WHO definition of health which includes also mental health impacts that could stem from new technologies.</p>
<b>4- Distance contracts</b>	<p>(1) Support Council's proposal about products free of charge</p> <p>(2) Support Commission's proposal</p>
<b>5 - General safety requirement</b>	<p>Make sure that the general safety requirement also applies to online marketplaces</p>
<b>7 – Aspects for assessing the safety of products</b>	<p>Support Council's approach to this article overall and proposal to convert initial article 6 into new article 7a</p> <p>Support Parliament's proposal to include risks related to loss of connection</p>
<b>8- Obligations of manufacturers</b>	<p>(4) Technical documentation: Support Council's approach and clarify that it must be drafted 'before placing on the market'</p> <p>(5) Support Parliament's proposal to keep technical documentation up to date</p>
<b>9- Authorised representative</b>	<ul style="list-style-type: none"> <li>- Extend the mandate to sample testing and oblige this entity to provide information about any action taken or planned to eliminate certain risks</li> <li>- ensure legal representation in the EU for all obligations of this Regulation</li> </ul>

<p><b>14 – Cooperation of economic operators with authorities</b></p>	<ul style="list-style-type: none"> <li>- Support Council’s proposals to provide market surveillance authorities with all necessary information about a product, including number of items placed on the market, related complaints and known accidents, information about suppliers</li> </ul> <p>Reject Parliament’s proposal to delete possibility to request regular progress reports about corrective measures</p>
<p><b>15 – Responsible Person</b></p>	<p>Support Commission proposal</p> <p>Reject Parliament’s proposal to restrict sample testing to certain products, categories of products or group of products</p>
<p><b>17- Traceability of products</b></p>	<p>Support Commission’s proposal</p>
<p><b>18 – Obligations of economic operators in case of distance sales</b></p>	<p>(a) support Council’s proposal and make sure that phone number is also communicated</p>
<p><b>20 – Online marketplaces</b></p>	<p>Online marketplaces should be regulated in Chapters II and III as economic operator and be given an importer-like status.</p> <p>The following obligations should apply to them:</p> <ul style="list-style-type: none"> <li>- Require traders to provide key information about products which can be shared with authorities on request</li> <li>- Give appropriate answer to product safety notices within 3 working days (both Council and Parliament)</li> <li>- Remove offers referring to dangerous products and to identical content (Council)</li> <li>- Consult the EU safety gate in addition to other database of interfaces about dangerous products</li> <li>- carry out random checks on products from non-EU traders</li> <li>- Suspend traders that frequently offer non-compliant products (Council)</li> <li>- Provide information about safety recalls and directly notify affected consumers (Council)</li> <li>- Conduct recalls and offer remedies to consumers in case no other economic operator in the supply chain act or can be identified</li> <li>- Keep authorities and other economic operators informed about accident and safety issues, and notify them on the business safety gate (Parliament and Council)</li> </ul> <p>Reject Parliament’s proposal about Memoranda of understanding.</p> <p>We doubt that self-certification of traders in line with the DSA will contribute anything meaningful to raising the level of safety (Council).</p>

<b>31- Information between public authorities and consumers</b>	Support Commission's proposal to ensure that the protection of commercial interests doesn't prevent consumers' right to information and transparency
<b>35 - Right to remedy</b>	Support Council's approach to this article Support possibility for consumers to submit complaints to competent authorities in case of non-satisfactory remedy (proposal both from the Parliament and Council)
<b>40 - Penalties</b>	Support Commission's proposals to establish an EU catalogue of criteria and types of infringement that lead to penalties Reject Council's proposal to delete provisions on recurrent penalties
<b>44 - Standardisation</b>	Support Council's approach to this article to ensure coherence of terminology and concepts about standardisation as well as legal certainty in the references made.
<b>44 - Amendments</b>	Support Parliament's proposal to include the GPSR in the Representative Actions Directive.

## Getting the key principles right

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- **The precautionary principle must be included into the scope** (article 2) and its value be better explained in the reasoning. We support the Council's approach.
- **The safety net function must be retained in the GPSR as one of its fundamental pillars.** We support a clarification in recital 6 as outlined by the Parliament (amendment 1): *"There is therefore a need for a broad-based legislative framework of a horizontal nature to fill gaps and therefore to complement provisions in existing or forthcoming sector-specific Union harmonisation legislation and ensure consumer protection not otherwise ensured by that legislation, in particular with a view to achieving a high level of protection of safety and health of consumers, as required by Article 114 and Article 169 of the Treaty."*
- **The General Safety Requirement (article 5) must include online marketplaces** as, firstly, products must be safe irrespective of the sales channels and, secondly, everyone in the supply chain must be legally obliged to only place safe products on the market. As none of the regulators propose this, we urgently ask policy makers to reconsider and strengthen their approach. A failure to do so would fall short of a promise to consumers that everything which is illegal offline is also illegal online.
- The **relationship between the main elements of the Regulation**, i.e., the general safety requirement (article 5), the specific safety criteria (article 7) and standardisation (article 6) **need to be clarified and brought in the right order.** To this end, the sequence of articles 6 and 7 as initially proposed by the European Commission should be inversed. This will ensure that the safety criteria apply to all responsible persons which play a role in ensuring safety, including to experts who draft technical standards, guidance documents etc.  
The first half sentence of article 7 should be deleted and be replaced with *'When assessing whether a product is safe'* to clarify that the safety criteria apply to all actors in the supply chain and not only to market surveillance authorities.  
We support the Council's proposal who found a convincing solution to this structure.
- **Placing and making available on the market** are two crucial concepts which must be clearly mentioned in the Regulation as they refer to different roles and responsibilities of different economic actors in the supply chain. The [updated Blue Guide](#) of the European Commission clarifies that these concepts are neither the same nor interchangeable. Therefore, Amendment 61 of the European Parliament which calls for a deletion of should be dropped.

## Getting the scope right (article 2)

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- It should be stated clearly in the subject matter that the main objective of this Regulation is to maintain a high level of health, safety, and consumer protection (as proposed by the European Parliament in Amendment 60).
- We are not against extending the scope to all products (Council approach), rather than only consumer products. However, we underline that consumers are more vulnerable than professional users and therefore it must be ensured that enough focus of market surveillance authorities is on consumer products.

## Getting the definitions right (article 3)

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- The definition for a **product** should refer to any product placed or made available on the market (Council suggestion). Referencing to both, 'placing', and 'making available' on the market is relevant.
- The definition for a **'safe product'** should not take out a reference to 'misuse' from the definition because this may lower the level of intended protection proposed by the European Commission. Products do not only need to be safe if consumers use them differently than intended but also in case of unauthorised access through third parties such as cases of cybercrime (which is a form of misuse).
- The mandate of the **authorised representative** must cover all obligations of manufacturers under this Regulation (Council suggestion). The authorised representative must be more than just a point of contact and information for the authorities as otherwise EU legislation will never be fully enforceable against manufacturers and traders who are not located in the EU and who sell via online marketplaces directly to consumers. Authorised representatives should therefore be obliged to inform national authorities about any action to eliminate the risks posed by certain products, carry out recalls of dangerous products, offer remedies to consumers, and be liable and subject to penalties if products they represent are non-compliant.
- The term **'online marketplace'** should be brought in line with the wording of the Omnibus Directive for reasons of legal consistency and be phrased as follows: *'online marketplace means a service using software, including a website, part of a website or an application, operated by or on behalf of a trader which allows consumers to conclude distance contracts with other traders or consumers'*.
- As roles in modern supply chains have changed with the arrival of e-commerce and as the unreformed current law (GPSD) so far does not include a definition for the term **'trader'**, we agree it is important to add such a definition (Council suggestion).
- **Legislators must define online marketplaces as 'economic operators'** and give them importer-like obligations including for products from third-party vendors in case no other responsible actor in the supply chain acts and in case EU legislation cannot be enforced. Consumer groups have brought a [wealth of evidence](#) in the last two years related to illegal and dangerous activities on online marketplaces for which so far no one in the EU can be held liable.
- While a general reference to standards adopted under this Regulation is important, we think that it is equally important to keep such definitions as clear and specific as possible in order to avoid confusion in the years to come. We support the wording of the Council which makes a clear and specific reference to this Regulation (article 44 on standardisation).

## Getting the safety criteria right (article 7)

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- Cybersecurity aspects should be further strengthened as products also need to be safe in case of a interconnection and loss of connection. While the Council proposed to clarify some of these aspects in the recital (18), the European Parliament also made a suggestion in this regard which should be added to article 7.



- Consideration should also be given to the Council's suggestion for article 12.2 that a substantial modification of a product can concern physical or digital aspects of a product which may require reassessment for health and safety as a hazard can change or be newly created.

## Getting the obligations of economic operators right

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- GPSR rules should apply to products offered free of charge which are distributed via distance sales (Council proposal).
- To determine whether an offer is targeted at consumers on a case-by-case basis, some criteria should be stated unequivocally in the text and not only in recitals. We suggest keeping article 4 paragraph 2 as originally proposed by the European Commission.
- While the necessary product documentation should be drafted *before* placing a product on the market rather than only at the time when market surveillance authorities ask for this, it should not be up for the manufacturer to decide on the scope of the documentation which market surveillance officers need to inform themselves on product compliance. To this end, we suggest phrasing article 8 number 4 as outlined by the Council, while integrating a suggestion from the Parliament as follows: '**Before placing a product on the market (EP)**, manufacturers shall draw up technical documentation. The technical documentation shall contain....' As also proposed by the Parliament in amendment 93 about article 8.5, the technical document should be kept up to date.
- To close one of the major loopholes related to products sold by manufacturers and traders who are located outside the EU, the Commission proposes that there must always be a "responsible person" for products placed on the Union market (article 15). When there is no manufacturer, distributor or importer located in the EU to endorse this responsibility, it is then proposed to require an "authorised representative" (article 9). While this can improve the situation compared to the status quo, we insist that as the proposed tasks of the authorised representative are too limited as they concern mainly the provision of information regarding the product but someone in the EU must in the end be held liable for not complying with EU product safety legislation. All requirements such as financing and carrying out product recalls from consumers must be reliably put in place irrespective where a product comes from.
- Policy makers must urgently take a closer look at the whole system of who is and can become an authorised representative in the EU, and what the potential for consumer detriment is, before rolling this out at an ever-larger scale. Like the Digital Services Act, the GPSR should at least foresee that companies who are operating from outside the EU must establish a legal representative who can be held liable for non-compliance with obligations from this Regulation. The mandate of this person should require not only to check that products comply with the legislation by checking technical documents, but also to carry out regular sample testing in laboratories. Enforcement authorities, including customs, should systematically monitor fraud and malpractice related to product representatives and inform each other about this. We insist that liability in the supply chain needs to be organised differently in general by making online marketplaces ultimately liable, including for products from third-party vendors.

- The provision that economic operators shall ensure that corrective measures are effective in eliminating or mitigating the risk shall be maintained. Market surveillance authorities should also be able to ask for regular progress reports and decide whether or when the corrective measures can be considered as completed. Market surveillance authorities should for reasons of traceability also be entitled to ask economic operators from whom they received supplies including parts, components and software embedded into a product and to whom they have supplied products. Economic operators should also inform Market Surveillance authorities about how many items have been placed on the market, in which Member States, and indicate if there are related complaints or accidents. The Council has made meaningful proposals on those points which we recommend incorporating.
- Introducing a specific system of **traceability along the supply chain** is an important novelty in the GPSR which can help improve the safety of products considerably. To implement the new traceability system efficiently it should not be overly bureaucratic and long consultation procedures should be avoided. The Commission should have the power to decide for which products or economic operators such a traceability system must be adhered to in the supply chain, and we suggest keeping the original wording of article 17, as proposed by the Commission.
- Economic operators should for distance sales indicate clear contact details such as postal and electronic address as well as a phone number. A picture should be made available and a batch, type or serial number. Moreover, the communication channels that consumers can use to request information about a product or report about a complaint or incident must take into account accessibility needs for persons with a disability.

## Getting provisions on online marketplaces right

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Citizens have been reassured that whatever is illegal offline should be also illegal online. While this should be a matter of course, policy makers are still failing to give market surveillance authorities the right tools and powers to be able to enforce legislation properly against vendors from non-EU countries on online marketplaces which do not play according to the rules.

Obligations of online marketplaces must stretch over the whole sales and distribution process as well as the use phase of a product. Only demanding to take down products from a website once a problem is already known, or injuries and accidents have already happened, is far too little too late and violates a consumer's basic right to safety.

The Digital Services Act has put in place few benefits that can contribute to enhancing product safety in the supply chain. These are:

- A clarification that non-compliant and unsafe products are 'illegal content' on websites which needs to be deleted by providers of online marketplaces based on requests from authorities.
- A requirement for online marketplaces to establish legal representation in the EU.
- Increased transparency for consumers about who the sellers are and increased information and better redress in case a dangerous product has already been purchased.
- Improved communication channels between authorities and online marketplaces as well as with consumers and consumer groups to flag dangerous items to online marketplaces.

Yet, obligations on online marketplaces for identity checks of traders before they are allowed to sell on these marketplaces are weak, and providers of online marketplaces continue to benefit inappropriately from liability exemptions if they act expeditiously after having been made aware about the fact a dangerous product is listed on their online marketplace. This is a different treatment than for importers, which are fully liable for placing and making available dangerous products on the EU market.

Even though the DSA is without prejudice to rules of other consumer protection legislation such as product safety and market surveillance, the GPSR has neither in the initial drafting phase by the Commission nor in the first negotiation phase in Parliament and Council set the right level of ambition: The main focus is still on the phase after products have been made available and placed on the market rather than on preventing that such products go on sale and arrive in the European Union in the first place. This completely neglects the fact that post-market surveillance is a costly, ineffective, and inefficient approach, and it is also inadequate in today's digitalised supply chains.

The EU institutions aim to solve the issue of enforceability through requiring an authorised representative and person responsible for the product to be available in the EU. When compared to the policy option to ultimately hold online marketplaces liable, this concept is weak and inefficient.

We note that the Council's position on the GPSR is somewhat more demanding compared to the European Parliament's one and therefore beneficial for consumers as it allows to demand the removal of similar items and strengthens proactive reporting obligations to the Business Safety Gate. However, the promise to consumers that everything which is illegal offline should be illegal online will not be kept if positions are not being reconsidered, as many product safety provisions can still not be enforced against traders from non-EU countries.

What **could really be a game changer** is to require online marketplaces, as any other economic operator, to only place safe products on the market. That is, to bring them into the scope of the general safety clause of the GPSR (article 5). Moreover, they should also be defined as 'economic operators', since their primary purpose is to make revenues from the sale of goods to consumers. Finally, marketplaces must be held liable for the safety of products from non-EU based sellers in case no other responsible economic operator can be found, or in case such economic operators do not take appropriate action to avert danger for consumers.

To this end, online marketplaces should be regulated in chapter II and III as every other economic operator rather than in a specific chapter which describes their (insufficient and low-level) obligations. As online marketplaces are nowadays part of the supply chain like importers and distributors, a different treatment is not justified. This means also that online marketplaces must make sure adequate documents can be provided to the authorities which proof product compliance, cooperate with authorities in case of questions, proactively inform authorities about dangerous products, report in the Business Safety Gate accidents and injuries which they may discover in the course of their business operations, carry out random checks to verify if products from non-EU vendors are safe and compliant, carry out recalls, and offer remedies to consumers.

It must be possible for market surveillance authorities to fine online marketplaces for non-compliance with this Regulation, in view of keeping consumers safe and preventing unfair competition. Such fines must cover the aspects mentioned above and not only what is foreseen in the regulatory text now. It would also be important to make it possible to apply recurrent fines to online marketplaces for the time the non-compliance continues to exist.

One criterion to be able to apply such a recurrent fine should be if authorities observe in general a high level of non-compliant products. This has been one of the considerations of the French authorities when deciding on measures concerning the platform Wish.com.

Promoting further voluntary action of online marketplaces should not be part of the final Regulation (article 20a new; European Parliament suggestion). The Safety Pledge has so far not led to tangible results for consumers. Furthermore, we wonder why online marketplaces like Wish.com can continue to remain signatories of the current Pledge without sanctions while the French authorities observed a high level of dangerous products on their website.

We have made more detailed proposals on how the text should be worded in [our previous policy paper](#).

## **Getting the enforcement framework right – representative action, remedies, recalls, penalties, and transparency on infringements**

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### **Including the GPSR into the Representative Actions Directive (RAD)<sup>1</sup>**

Today, with globalisation and digitalisation ever more present, consumer rights infringements including on product safety can easily affect high numbers of consumers. Often, individual consumers do not go to court for low levels of compensation, as it would not be financially justified and therefore, when situations occur where many consumers are harmed, collective redress is a crucial tool for access to justice for consumers.

The European Parliament has considered this important point (amendment 238 about Article 44 a-new) and we strongly recommend amending annex I point 8 of Directive 2020/1828/EU to include the GPSR in general into the scope of the RAD.

### **Remedies for consumers: more options to chose from**

Council proposes that companies should offer consumers at least two different types of remedies instead of just one in case a product is being recalled. We support this approach which improves consumer's rights and convenience.

### **Recalls: everyone needs to contribute, also online marketplaces**

In case of product recalls, all players in the supply chain need to take efforts to remove an imminent danger from consumers as quickly and effectively as possible. Such actions need emergency preparedness and response in terms of logistics and strategy as well as financial effort. Large online marketplaces should also set up such capacities and procedures. We are not satisfied with the current state of the discussions where online marketplaces would only need to provide information about consumers who have purchased a recalled product, rather than obliging marketplaces to carry out a product recall themselves if the non-EU trader or its representative is not reachable and does not act.

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<sup>1</sup> Directive (EU) 2020/1828 of the European Parliament and of the Council of 25 November 2020 on representative actions for the protection of the collective interests of consumers and repealing Directive 2009/22/EC.

## Penalties

While the European Commission proposed a more harmonised approach for setting penalties across the EU, the co-legislators intend to delete all indicative criteria listed in the draft legislation which would lead to a penalty (such as the number being made available on the market, the duration of the infringement, the gravity, the level of risk etc.). This is unfeasible as we need a more pan-European approach to market surveillance. Why would the same dangerous product be less or more fined in country A than compared to country B?

Member States should not take two years before notifying the Commission about national rules on penalties. As rules on information exchange about penalty procedures is already in the legislation today it should be quick and easy to update such information. If some Member States would not have done it until now, it would mean they are even now behind in applying a more European-wide comparable approach to enforcement. We therefore recommend sticking to the 3-months deadline initially foreseen by the European Commission.

The indicative list of criteria for penalties and the list of possible infringements should not be deleted as this list is important to apply a more coherent approach to enforcement across the EU.

Precisions on periodic penalty payments and on transparency and reporting obligations about the fines imposed should be kept. Information about which companies have been fined for which non-compliance and at which level should regularly be disclosed as such information is in the public interest and cannot be claimed to be business secret.

## Business secrets must not protect those who infringe legislation

Transparency about who – sometimes on purpose and repeatedly – violates EU product safety rules is important. Consumers do not only have a right to be informed about the wrongdoing of noncompliant companies but can also vote with their feet to no longer purchase products for example from online marketplaces where the level of noncompliance is in general high and / or from untrustworthy producers and traders.

To enable consumers to make the right and safe choices and help fair competition in the single market, the rules on 'business secrets' must not be too far reaching and must not unilaterally protect businesses who violate legislation. For this reason, we strongly reject the European Parliament's amendment 222 (about article 40.8) and Council's addition to article 31.2.

## Ensuring consumers are adequately being informed

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High quality safety instructions are key for the safe installation, use and maintenance of products. We insist that consumers must be provided with written information in the language spoken in the country where products are sold. If digital information is provided on a voluntary basis by manufacturers, this can only be in addition to written information and not become a substitute. It is of utmost importance that the wording in the legislation will clearly state the information requirements accordingly.

## Important points missing so far

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We are disappointed that two important elements which consumer groups have recommended are so far absent from the negotiations.

First, we had proposed that the European Commission should be able to require independent third-party testing prior to placing and making available certain products on the market. We consider this important to allow the legislator, depending on the level of risk of a product, to go beyond a manufacturer's self-certification which is often neither trustworthy nor provides for an adequate level of protection. This is even more true for products which are sent to consumers directly from outside the EU and in cases where EU standards are not applied. The fact that no sector-specific legislation at the EU level has been adopted, and the product therefore falls into the scope of the General Product Safety Regulation, does not mean that it is per se of low risk. Examples of this are childcare articles for children such as highchairs which are often notified in Safety Gate as dangerous.

Second, even though a few new provisions are foreseen on accident and injury reporting in Safety Gate, an encompassing approach which would require medical staff to investigate, document and report accidents/injuries that occur in combination with a specific product is missing. This is a major shortcoming knowing that accidents and injuries place a high burden on individuals and society overall, and that insights into the underlying reasons could considerably improve safety legislation, technical standards, instructions to consumers about safe use, and enforcement measures.

We have made more detailed proposals on how the text should be worded in [our previous policy paper](#).

## Evaluation of the future rules

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An evaluation should cover challenges posed by new technologies and online marketplaces as well as the impact of traceability systems.

It will be beneficial to carry out such a proposal after three instead of five years and to accompany the evaluation report already potentially with a legislative proposal (Council suggestion).

We are however concerned that a transition period of two years for the new rules is too long and recommend an application date within six months after adoption.

ENDS.



*This publication is part of an activity which has received funding under an operating grant from the European Union's Consumer Programme (2014-2020).*

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