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## Impact of the 'EU Safety Tested' mark on the European market

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### Preamble:

EEPCA ([www.eepca.eu](http://www.eepca.eu)) has noted with great interest the initiative of the Committee on Internal Market and Consumer Protection (IMCO) to launch a study on the "impact assessment of the EU Safety Tested marking" and would like to take this opportunity to share some thoughts and some of its experience in the field of 3<sup>rd</sup> party voluntary certification.

### Why 3<sup>rd</sup> party voluntary certification?

EEPCA supports the principle that voluntary 3<sup>rd</sup> party certification is an important tool of demonstrating product safety compliance and this in particular for consumer products.

As a matter of fact voluntary 3<sup>rd</sup> party certification is the activity that EEPCA Members have been doing every day for decades by granting certification marks and in particular since 1992 (in relation to the Single European Market) with the ENEC Mark ([www.enec.com](http://www.enec.com)).

In essence, the ENEC certification process includes the following steps:

- Initial Type Testing of conformity to European Norms (standards) (EN's) of CENELEC.
- Initial Factory Production Control;
- Granting of the certification mark like for example ENEC mark.
- Surveillance tests and visits to production lines are conducted yearly to confirm that the conditions for using the certification mark are continuously satisfied.

### The EU Safety Tested mark:

EEPCA wishes to underline the common experience that a certification mark needs decades before it becomes sufficiently known and therefore accepted and welcome in particular by consumers and accordingly the ENEC mark that was developed in 1992 for consumer protection seems to be in a reputable position for matching the high expectations of the ambitious European consumer protection program that are behind the proposal of the "EU Safety Tested mark", a totally new European safety mark.

It seems also useful to underline that the technical features of the ENEC mark are fully in accordance with the principles laid down in the harmonized international standards ISO/IEC 17065:2012 “requirements for bodies certifying products, processes and services” and ISO/IEC 17025 “General requirements for the competence of testing and calibration laboratories” and this is another aspect of interest that can be further exploited when negotiating agreements of mutual recognition aiming at the removal of technical barriers to trade.

## Conclusion

EEPCA believe that creating a new 3<sup>rd</sup> party conformity mark such as “EU Safety Tested” is not necessarily the best way to improve the quality of the products that are on the European market. It will likely just add confusion.

EEPCA would rather welcome with great pleasure the commitment from the European Parliament that “European certification marks like the ENEC Mark, be recognized as an important means of demonstrating that products meet essential safety and health requirements laid down in EU Directives and Regulations”.

EEPCA sees the potential impacts on the different stakeholders as follows:

Concerned stakeholders	Expected impacts	EEPCA Vote
Consumers	More certainty with respect to objective safety of a product	Yes
	Less transparency regarding the objective safety of a product	No
	Better understanding of the meaning of marks and the difference between them	No
	Less unsafe products on the market	No
	Higher prices of marked products	No
Manufacturers of consumer products (general)	Increased credibility of acclaimed safety of products	Yes
	Less possibilities for unfair competition by rogue traders	No
	Duplication of requirements for obtaining marks for harmonised products	Yes
	Increased clarity on the possible ways for assessing the objective safety of a product	Yes
	More opportunities to differentiate product from non-marked competitor products	Yes
Manufacturers of consumer products (SMEs)	Increased possibilities to compete with well-established brands	Yes
	Higher competitive disadvantage vis-a-vis large enterprises due to lower economies of scale in obtaining the mark	Yes
Importers / Distributors	More certainty with respect to objective safety of a product	Yes
	More opportunities to differentiate product from non-marked competitor products	Yes
National authorities	Reduced need for controls due to reliance on the trustworthiness of products carrying the mark	Yes
	Increased workload due to surveillance of the proper use of the marking	Yes

EEPCA ([www.eepca.eu](http://www.eepca.eu)) , the European Electrical Products Certification Association, represents 26 Certification Bodies and 48 Testing Laboratories in the area of voluntary third party certification of electrical products. EEPCA is a Cooperating Partner of CENELEC and of EA, the European Cooperation for Accreditation. It administrates the CCA, ENEC, HAR, Keymark and EMC Schemes, as well as the LVD Notified Bodies Forum.