

# Joint Market Surveillance Action on Harmonised Products **JAHARP18**

On Small Recreational Craft and Portable Room Heaters

## Layman's Report



Co-funded by  
the European Union



**PROSAFE**  
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### **Disclaimer**

This report arises from the Joint Market Surveillance Action on Harmonised Products - JAHARP18, which receives funding from the European Union for the action 'Joint enforcement actions for market surveillance of products in the EU'.

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## List of abbreviations

Adco	Administrative Cooperation Group
CE	European Conformity (Conformité Européenne)
DG GROW	Directorate-General for Internal Market, Industry, Entrepreneurship and SMEs
EEA	European Economic Area
EN	European Standards
EU	European Union
GA	Grant Agreement
ICSMS	Information and Communication System for Market Surveillance
ISO	International Organization for Standardization
LVD	Low Voltage Directive
MSA	Market Surveillance Authority
OJ	Official Journal of the European Union
RAPEX	The Rapid Alert System for Non-Food Products
RCD	Recreational Craft Directive
WP	Work Package

# Executive summary

## Objectives of the action and product scope

[The Joint Market Surveillance Action on Harmonised Products - JAHARP18](#) is a Joint Action co-funded by the European Union to support the market surveillance of **Recreational Craft** and **Portable Room Heaters**.

The activity ran between November 2019 and August 2022 with the involvement of 11 Market Surveillance Authorities (MSAs) from 9 EU Member States: Bulgaria, Croatia, Cyprus, Finland, France, Latvia, Malta, Portugal and Sweden. [PROSAFE](#) was the Project Coordinator.

The objectives of the JAHARP18 product-specific activities were:

To survey the state of compliance and safety in the internal market	To identify and deal with non-compliant products, so that either they are brought into conformity or withdrawn	To reduce unfair competition created by free-riders	Reduce the risks of accidents, thereby improving the protection of the health and safety of European consumers
To raise awareness among manufacturers, importers, distributors about the problems identified on the market for a durable improvement	To strengthen cross-border cooperation among MSAs and built capacity	To raise the profile of EU market surveillance in general	Give policy-related feedback

The project focused on two product categories: **small inflatable and open rigid hull recreational craft of less than 6m** under the Recreational Craft Directive 2015/53/EU (RCD) and **portable room heaters (fan, convector, oil-filled and radiant)** within the scope of the Low Voltage Directive 2014/35/EU (LVD).



Figure 1 - Product types tested by JAHARP18

## Snapshot of Test Results

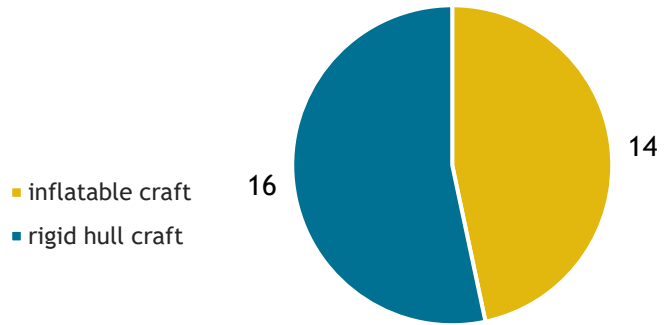
### Recreational craft

A total of 30 models of inflatable and rigid hull recreational craft were sampled from manufacturers, importers, distributors and web shops, applying -for the most part- a risk-based approach.

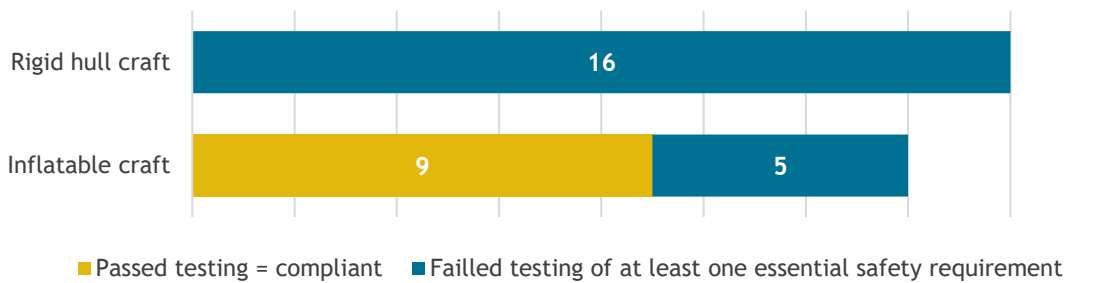
All 30 models were tested in two selected accredited laboratories to verify compliance with the essential requirements of Annex I.A of the Recreational Craft Directive (RCD).

The test results showed that a total of 21 models were non-compliant to at least one essential requirement.

Number of tested recreational craft



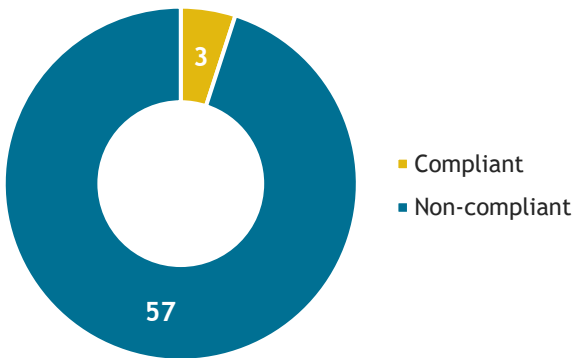
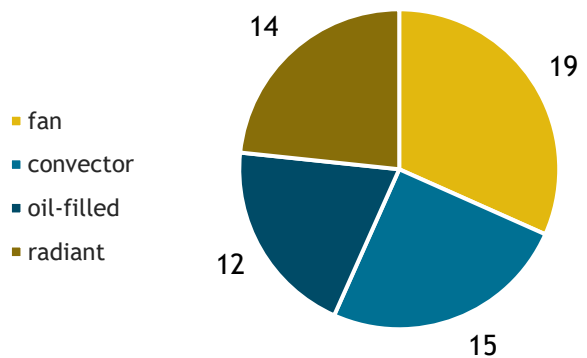
Overall test results



### Portable room heaters

60 portable room heater types were sampled from physical shops including 19 fan, 15 convector, 12 oil-filled, and 14 radiant.

Number of tested portable room heaters



Only 3 of the 60 models examined and tested in an accredited laboratory were fully compliant with the test programme, which was based on the latest edition of harmonised standard EN 60335-2-30. Over 55% of the tested models had multiple non-conformities.

Post testing risk analyses by the MSAS showed that 28 models presented a low risk, 10 a medium risk, and 1 a serious risk.

**CAUTION !**

These results are based on samples of products collected from the markets in the participating countries. As in most market surveillance activities, the results represent **the targeted efforts that authorities undertook to identify non-compliant products**. Because of that, **the results of this joint action do not present a statistically valid picture of the situation of the entire market of recreational craft and portable room heaters.**

## Key recommendations

### 01. For Consumers

- > Before buying a portable room heater or a small recreation craft, pay attention to the markings and any safety warnings. After purchasing, read the safety instructions or the user manual.
- > Buy from trusted retail channels. Check for registered dangerous products in the European Commission's **Safety Gate**. **If listed, don't buy!**



- > Choose a room heater with a thermostat and overheat protection
- > Place the heater on a solid, flat surface
- > Always unplug space heaters when you leave the room or when not in use
- > Keep space heaters at least 1 meter away from flammable items, objects, and from water
- > If you're unsure if a product is suitable for your intended use, ask!

> Communicate quickly and reliably in case of product recalls



### 02. For Economic Operators

- > Ensure the accuracy and completeness of the markings, warnings, and instructions of the products

> Improve the level of cooperation when approached by a market surveillance authority

- > Control the quality of your products. Only trade products that meet all the legal requirements as set out in Directive 2013/53/EU on recreational craft and personal watercraft and in Low Voltage Directive 2014/35/EU and in the relevant harmonised standards.



**Safety Gate** is the EU's rapid alert system for dangerous products. Every week, national authorities across the EU send alerts on products found to pose a serious safety or health risk to consumers. Visit the [Safety Gate](#) to learn more about unsafe products. And remember—if a product is listed in Safety Gate, don't buy it!

# 1. Overview of the activities

**Participating EU Market Surveillance Authorities in JAHARP18**



Coordinated by **PROSAFE**  
Joint Actions Best Practice

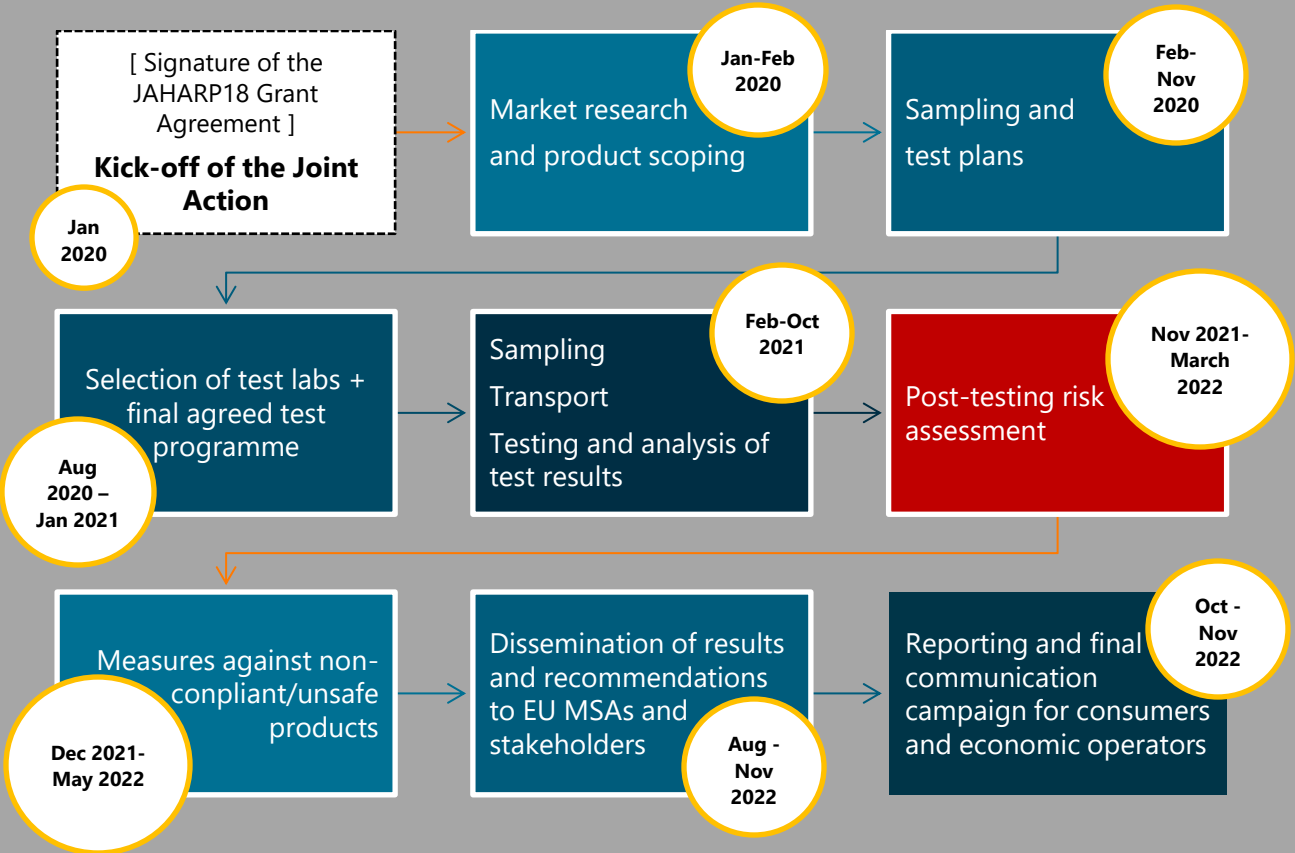
## Two product-specific Working Groups

The JAHARP18 project included two product-specific activities relating to **Recreational Craft** (Work Package 2) and **Low Voltage electrical appliances - Portable Room Heaters** (Work Package 3).

The Recreational Craft activity involved the **Market Surveillance Authorities (MSAs)** from **7 EU Member States**: Bulgaria, Finland, France, Latvia, Malta, Portugal, and Sweden. The Portable Room Heaters activity was carried out by the authorities of **6 EU Member States**: Bulgaria, Croatia, Cyprus, Finland, Malta and Sweden.



# The JAHARP18 process



## 2. Inspection and test results

### 2.1 Recreational craft

#### Product Scope

The participating MSAs set the scope of the activity based on a market analysis, with feedback from stakeholders. The project group decided to focus on small inflatable craft and open rigid hull craft with a hull length of less than 6m intended for use with an outboard engine that can easily be purchased by inexperienced consumers.







Figure 2 - Examples of small inflatable and rigid hull craft

## Inspections and test results

**21 of the 30 models of small recreational craft tested did not meet at least one of the essential requirements of the Recreational Craft Directive.**

The MSAs sampled in total 30 models of recreation craft, 14 inflatable and 16 rigid hull. Most of the inflatable craft sampled (10/14) came from manufacturers located outside the EU (China, Ukraine and Russia). In contrast, most of the rigid hull craft sampled (13/16) were manufactured in the European Economic Area (EEA); the remaining came from China.

Each of the seven participating MSAs sampled 4 or 5 models of inflatable or rigid hull craft or in some cases of both from their national market considering the structure of the market in each country.

Before sent for laboratory testing, all sampled models were checked with respect to the marking and documentary requirements of the RCD. All the inflatable craft examined by the MSAs had one or more non-conformities regarding markings and documents. For the rigid hull craft checked, only 2 out of 16 had no non-conformities relating to markings and documents.

Checks on markings and documents on inflatable craft

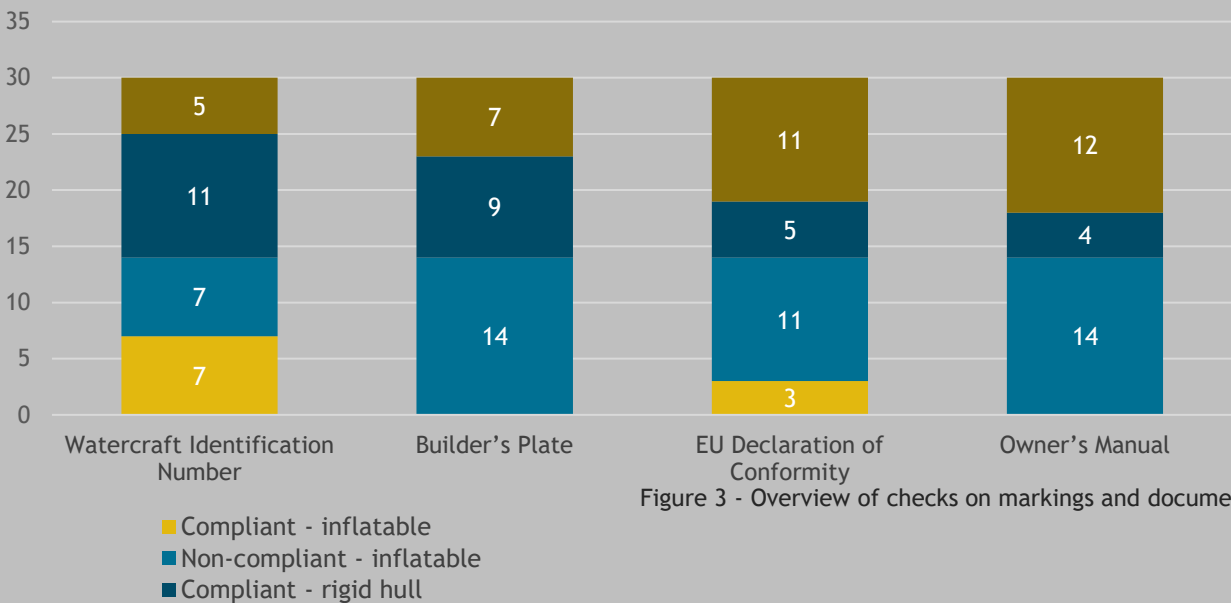


Figure 3 - Overview of checks on markings and documents

All 30 models of recreational craft sampled by the participating MSAs were sent for testing to two test laboratories that were accredited according to the applicable harmonised standards. The test labs were selected via two open calls for tender.

The test results showed that 5 out of 14 of the inflatable craft tested failed one or more of the tests relating to the essential safety requirements of Annex I.A of the RCD. Most of the non-conformities detected on these craft were of a minor character. Conversely, all the 16 rigid hull craft tested did not meet one or more of the requirements.

**Out of 14 inflatable craft models tested, the number of models that failed tests on the following essential requirements of the RCD was:**

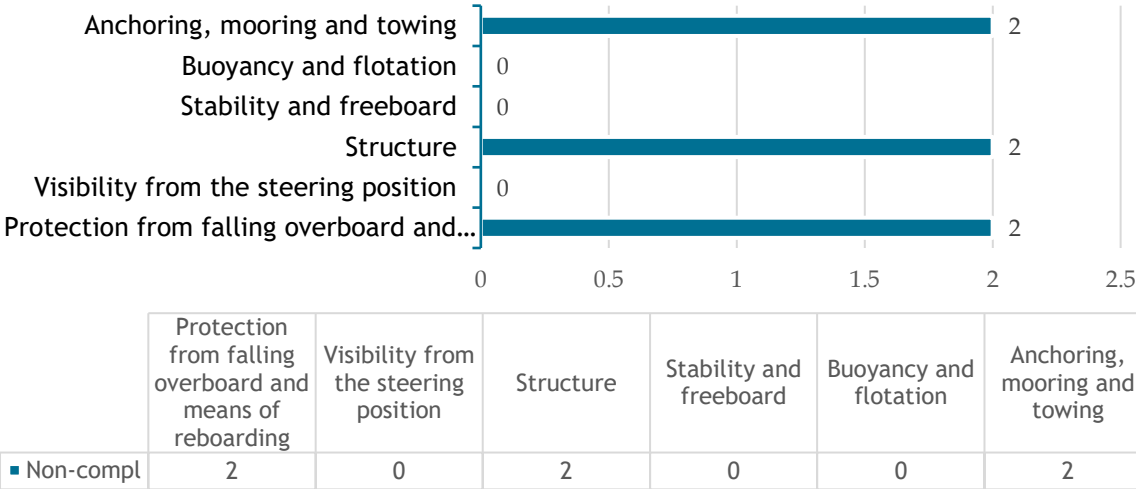


Figure 4a - Overview of test results for inflatable craft models

**Out of 16 rigid hull craft models tested the number of models that failed tests on the following essential requirements of the RCD was:**

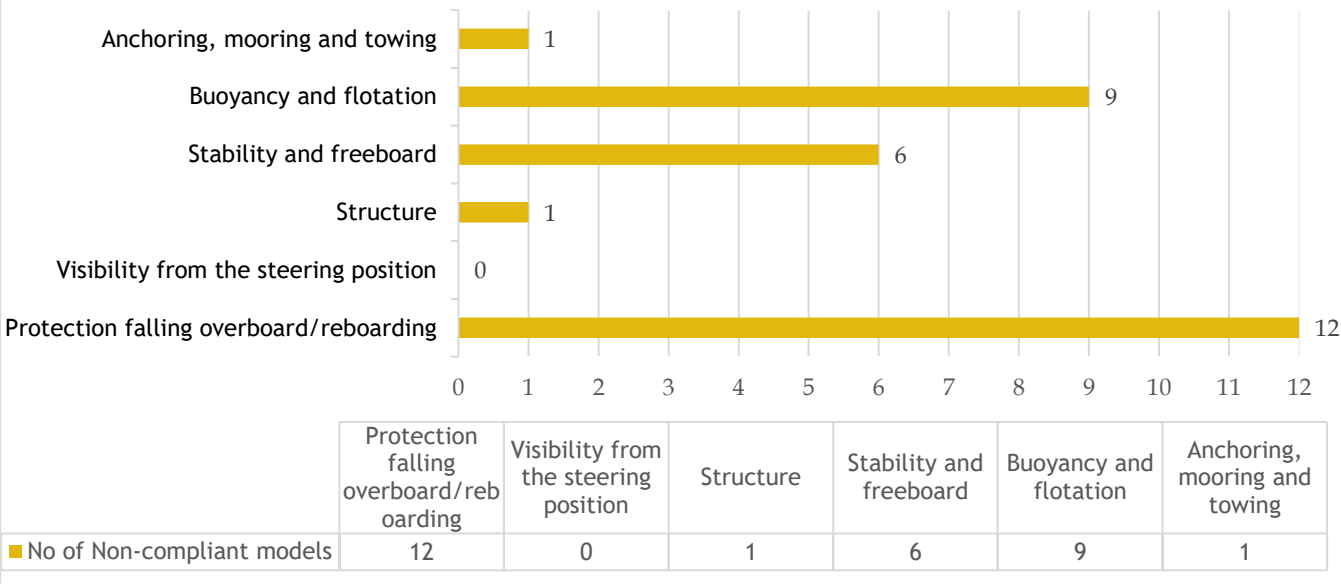


Figure 4b - Overview of test results for rigid hull craft models

## Conclusions on identified risks and safety issues

To determine the corrective measures to be taken against non-compliant and unsafe products, the MSAs carried out a risk assessment with respect to the aspects of non-compliance detected during the checks and testing that were liable to jeopardise the safety of users.

To analyse risks, the MSAs used two methods:

- (1) The European Commission's Risk Assessment Guidelines (RAG) tool<sup>1</sup>, and
- (2) The risk assessment method developed by the RCD ADCO Group that is based on a previous version of the RAPEX RAG, now adapted to take account of specific risk factors for recreational craft.

There were non-conformities detected in connection to the Owner's Manual.

These are perceived to increase the probability of the use of recreational craft in a manner that is unsafe. The group assessed the risk to be generally low.

Risk level of sampled models relating to key detected non-conformities

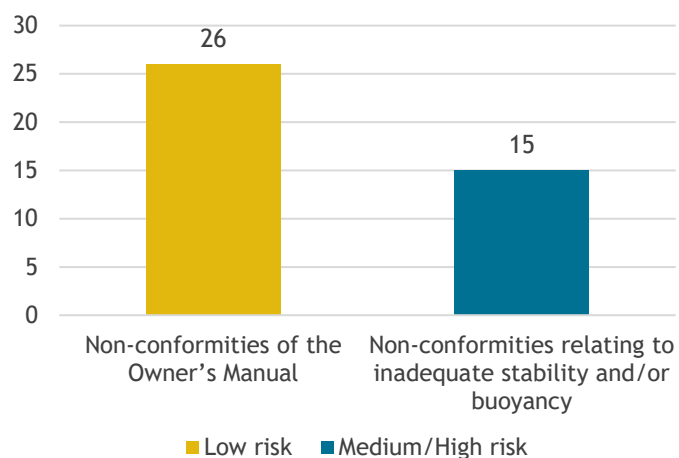


Figure 5 - Risk assessment - key results

With respect to the non-conformities relating to inadequate stability and/or buoyancy, the possible injuries are fatal due to exposure or drowning.

However, the probability of an accident scenario leading to such an outcome was generally assessed as low. This combination of severe consequences and low probability generally resulted in a medium or high-risk level.

## Measures taken against non-compliant products

Based on the risk assessments that were carried out and after consulting the economic operators concerned, the MSAs determined what corrective action to take with regards to recreational craft that do not comply to the RCD requirements and the applicable standards.

A total of 27 voluntary and mandatory corrective measures were taken against products that did not meet the requirements. The resolution of 6 additional cases is pending.

<sup>1</sup> <https://ec.europa.eu/rag/#/screen/home> (accessed Nov 2022)

**Corrective measures taken against non-compliant recreational craft tested by JAHARP18**

- No measures needed
- Brought into conformity - VOLUNTARY
- Withdrawn from the market - VOLUNTARY
- Recalled - VOLUNTARY
- Brought into conformity - MANDATORY
- Withdrawn from the market - MANDATORY
- Recalled - MANDATORY
- Pending cases



Figure 6 - Overview of corrective measures

In addition, products that pose a serious/high risk to consumers should be flagged and registered in [the European Commission’s Safety Gate](#), the EU’s rapid alert system for dangerous non-food products<sup>2</sup>.

So far, the concerned MSAs notified via the Safety Gate the measures taken with respect to 12 non-compliant and unsafe products. Several other notifications are pending.

<sup>2</sup> <https://ec.europa.eu/safety-gate/#/screen/home> (accessed Nov 2022)

## 2.2 Portable room heaters

### Product Scope

Based on a preparatory risk and market analysis, the 6 involved MSAs decided to sample four portable room heater types subject to the safety requirements for electrical equipment, including household portable room heaters, set out in Annex I of the Low Voltage Directive 2014/35/EU (LVD). Each MSA agreed to sample and test 10 models across all four categories.



Figure 7 - Examples of portable room heater types checked by JAHARP18

There is a number of ways that room heaters can pose a safety hazard to users/consumers, including electric shock and burn hazards. Each year portable room heaters are responsible for thousands of residential fires, accidents, injuries and deaths worldwide.

### Inspections and testing results

**Only 3 of the 60 models examined were fully compliant, with 60% having multiple non-conformities.**

The total number of portable room heater models tested by the project group was 60. The MSAs decided to target cheaper products with less established brand names.

Each MSA screened first products online to obtain product information and then proceeded with buying from a physical shop or directly from the high street shops.

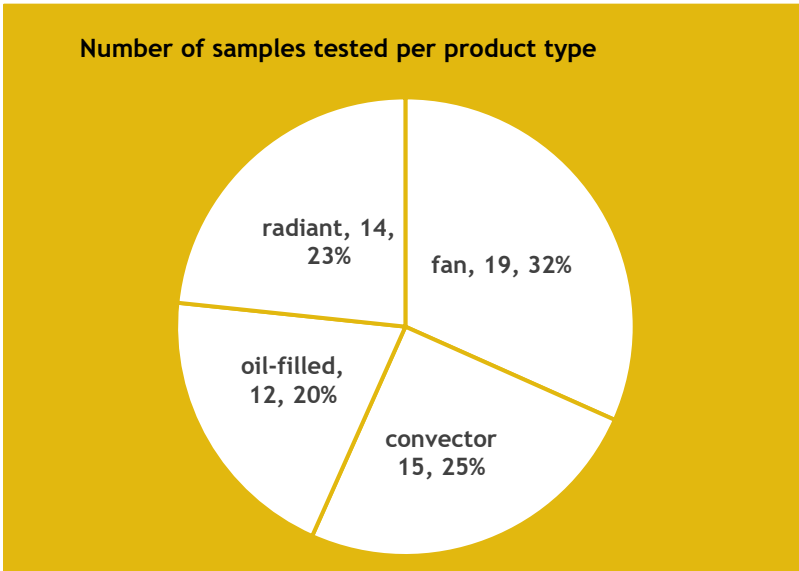


Figure 8 - Samples tested per type of portable room heater

‘Manufacturer’, as defined in the Low Voltage Directive, means “any natural or legal person who manufactures electrical equipment or has electrical equipment designed or manufactured, and markets that equipment under his name or trademark”. 80% of the products sampled indicated the country of origin.

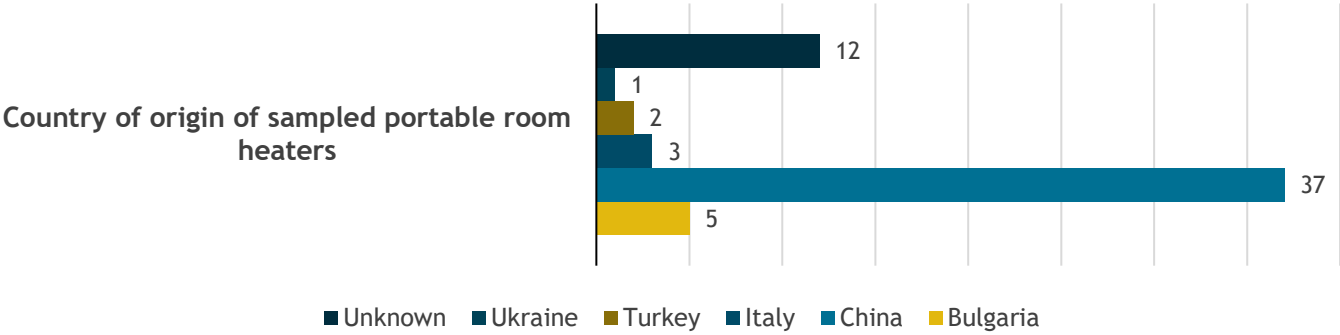


Figure 9 - Country of origin of the tested portable heaters

All 60 sampled portable room heater models were tested to 16 safety-critical clauses of the latest valid editions of harmonised standards: (i) EN 60335-1:2012 + A11:2014 + A13:2017 +A1:2009 +A14:2019 +A2:2019 – Household and similar electrical appliances - Safety - Part 1: General requirements; and (ii) EN 60335-2-30:2009 + A1:2008 + A11:2012 + A1:2020 +A12:2020 – Household and similar electrical appliances - Safety - Part 2-30: Particular requirements for room heaters.

Overall, 77% of the 60 models sampled by the MSAs had non-conformities with regards to markings and instructions. This non-compliance trend was consistent across all four heater types with 84% of fan, 67% of convector, 75% of oil-filled, and 78% of radiant heater products having such non-conformities.

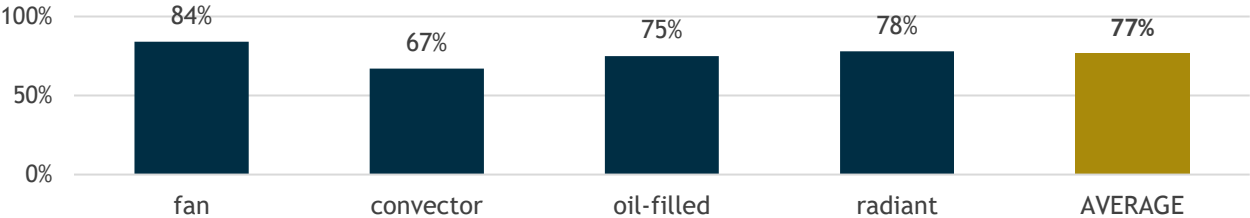
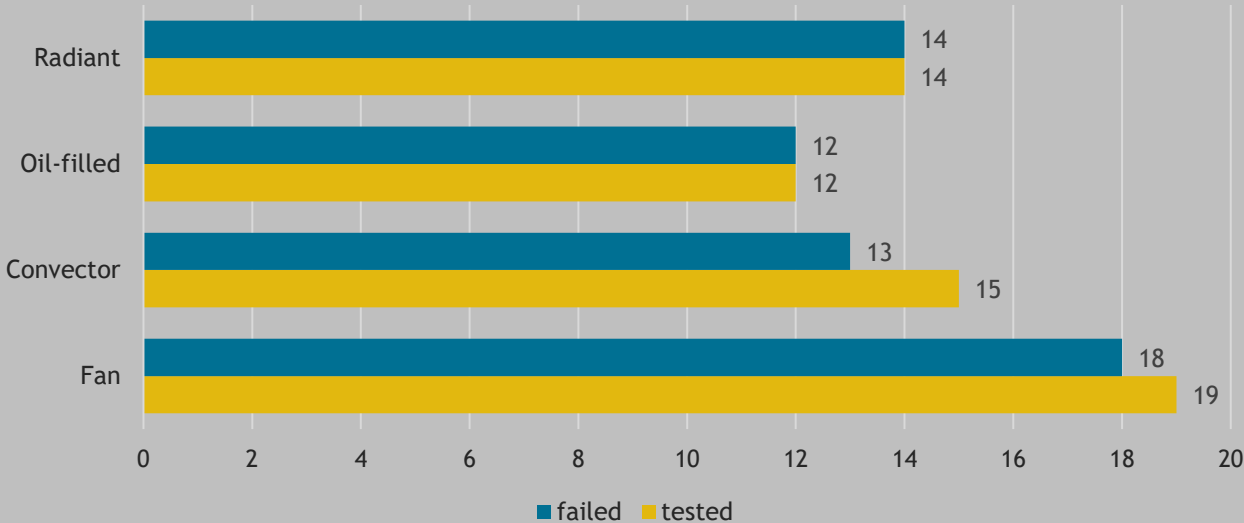


Figure 10 - Results of checks on markings and documentation

Test results showed that only 3 of the 60 models of portable heaters met all the requirements of the harmonised standards as defined in the final test programme.

Overall test results per product type

Figure 11 - Overview of test results



## Conclusions on identified risks and safety issues

Similarly, to the recreational craft activity, the MSAs involved in the portable room heaters action also utilised the European Commission’s RAG tool for carrying out risk assessments to evaluate the risk posed by all the identified non-conformities. 11 out of 57 non-compliant products were found to present a medium or serious risk.

Risk level associated with the detected non-compliant models

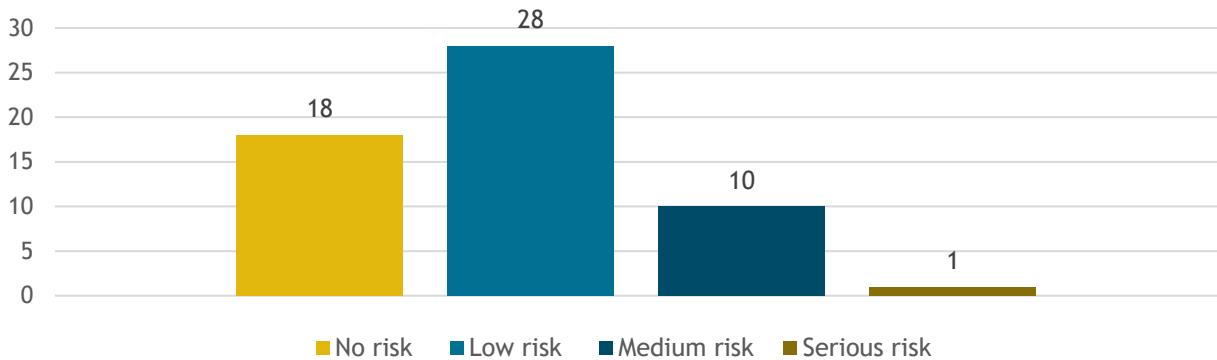


Figure 12 - Risk assessment



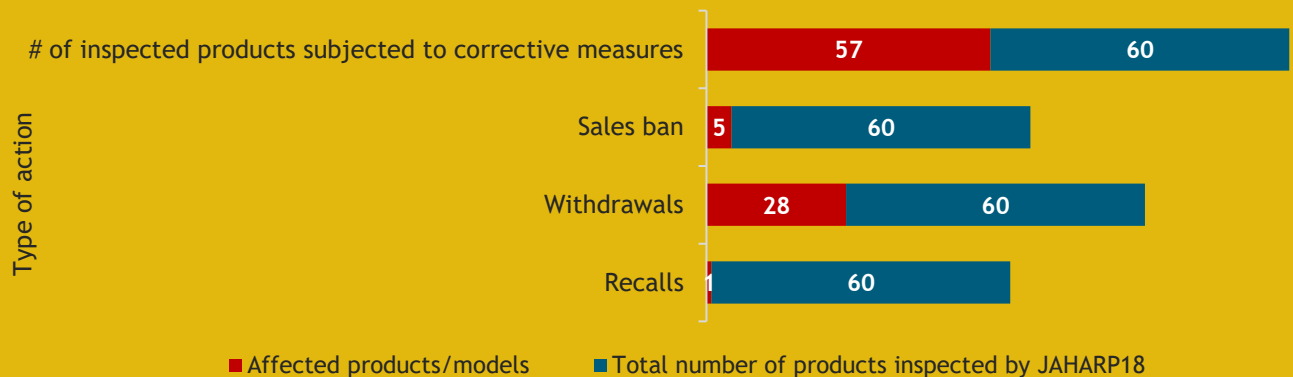
- ! ELECTRIC SHOCK HAZARD
- ! BURN HAZARD
- ! KEEP CHILDREN AND PETS AWAY

## Measures taken against non-compliant products

Based on the results of the laboratory testing and the risk analyses, the MSAs concerned took various corrective measures to ensure that products which do not meet the relevant legal requirements are either brought into conformity or removed from the market. Overall, no corrective action was required for only 3 of the 60 samples tested.

### Corrective measures taken against non-compliant room heaters

Figure 13 - Corrective measures





# Conclusions and recommendations

14 inflatable boats and 16 rigid hull craft were tested to verify compliance with the essential requirements of Annex I.A of the Recreational Craft Directive (RCD). 5 of the 14 inflatable boats and 16 models of rigid hull craft that were sampled failed the testing of at least one essential requirement.

57 (95%) of the 60 portable room heater models tested failed the test programme that verified compliance with the Low Voltage Directive (LVD) and the applicable standards. More than 30 samples had multiple types of non-conformity against the clauses of the harmonised standard applied and the test criteria.

Overall, the product risks revealed by the two activities were consistent with the risks identified at the beginning of the joint action based on the prior field experience of the participating MSAs. By October 2022 the inspection and testing activities had led to 12 Safety Gate notifications with respect to non-compliant recreation craft. One notification was made for a fan heater posing a serious risk to the health and safety of consumers.



Figure 14 - Failure of a rigid hull craft during the level (swamped) flotation test: the aft of the boat is supported by the bottom of the test basin (left); Failure of a grab handle during strength test (right)

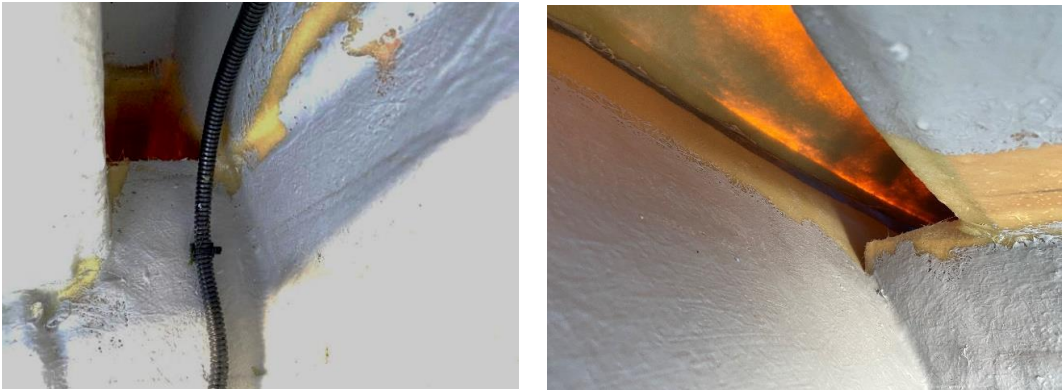


Figure 15 - Openings in the fore and aft bulkheads allow water to flood the craft



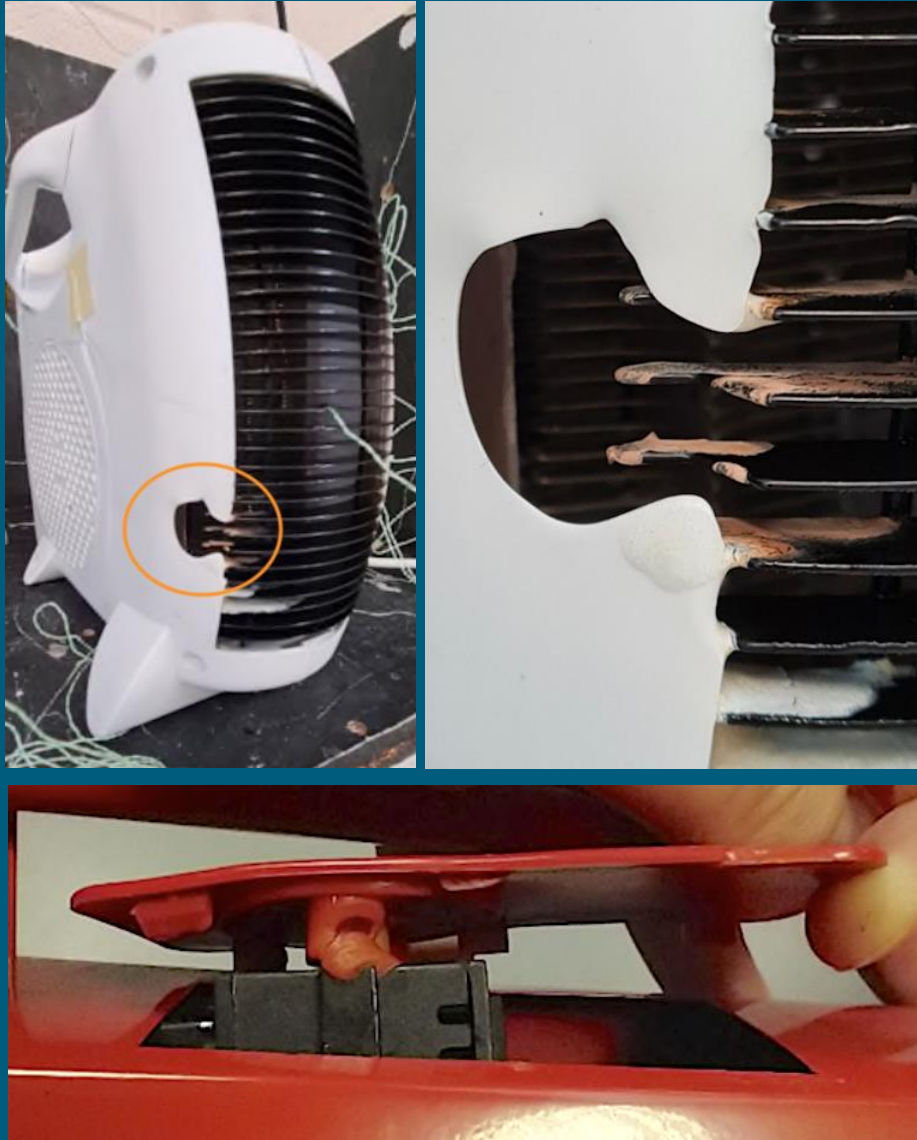


Figure 16 - Melted enclosure revealing accessible live parts in two tested portable room heater models

Based on the results of the JAHARP18 inspection and testing activities and the subsequent analysis of the risks associated with the non-compliant products, these are some key recommendations to stakeholders:

# Tips for consumers ✦

**01**

**Pay attention**

to markings and safety warnings. Read the safety instructions/ manual before use.

**03**

**Be aware**

of the safety risks for you and your family when using a portable room heater or a recreational craft.

**02**

**Know who you're buying from**

Always buy products from trustworthy retailers.

**04**

**Check before you buy**

Visit the EU's Safety Gate website to find all detected dangerous products

# Tips for MSAs ✦

**01**

**Continue market surveillance**

on recreational craft and portable room heaters, considering the findings of JAHARP18

**02**

**Share the JAHARP18 results and lessons learned with all EU/EEA MSAs**

**01**

**Place products on the market**

with complete and accurate markings and instructions

**03**

**Improve**

your communication and accessibility of information in case of recalls

**02**

**Ensure**

that your products comply with all applicable EU legislations

**04**

**Enhance**

your cooperation with MSAs

# Tips for economic operators ✦

**“ YOUR SAFETY IS OUR  
PRIORITY**

PROTECT YOURSELF AND YOUR  
FAMILY.

DON'T BUY DANGEROUS  
PRODUCTS.

#SAFETYGATE ”

