

BEST PRACTICE TECHNIQUES
IN MARKET SURVEILLANCE

REVISION OF RISK ASSESSMENT CHAPTERS
(Chapter 10 + Annex B, C and I)

10 RISK ASSESSMENT

10.1 Introduction

10.1.1 Contents of this chapter

The focus in this chapter is entirely on the risk assessment of specific products in the context of market surveillance. It is based on the RAPEX Guidelines containing a specific method for risk assessment. These Guidelines explain the practical arrangements an authority needs to make in order to do sound risk assessment.

The following parts are dedicated to:

- data collection; what data are needed for an evidence-based risk assessment and how can you get access to them? Data on product use, injury data, test results of products, etc.
- practical recommendations to perform assessments; advantages and disadvantages of different methods.
- reporting risk assessments.

10.1.2 What is risk assessment?

Risk assessment is the process that estimates the risk that a product with dangerous properties poses on people, animals or property. (Note that risk in the context of the GPSD and the RAPEX guidelines focuses on risk posed to people. Other directives, e.g. the low voltage directive have a broader definition that includes “animals and property” as potential victims. Directives that deal with chemical risks often also consider the risk posed on the environment. The broader definition has been adopted in the presentation to make the concept of risk assessment as generally applicable as possible.) The process includes identification of potential hazards associated in particular with the non-compliances against standards or legislation and estimation of the probability that the hazards will lead to an injury.

In general the following equation defines risk:

$$\text{Risk} = \text{Severity} \times \text{probability}$$

In practice, this equation is difficult to apply as the severity and the probability are seldom well-defined numbers:

- The severity is often given as a verbal qualitative description of an injury caused by a given dangerous property in the product.
- The probability is normally difficult to estimate. Often the market surveillance officer may find it difficult to decide on the most correct order of magnitude.

Risk assessment is carried out for a specific product (that is under investigation by the market surveillance authority) and the output is an estimate of the risk level that can go into the further steps of risk management and communication.

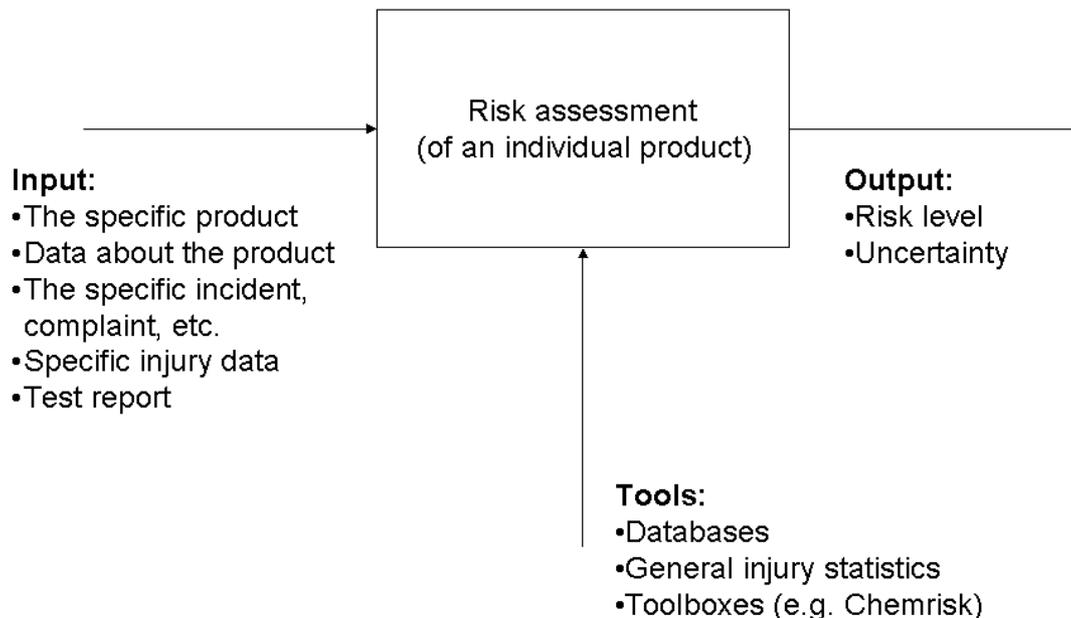


Figure 5 - Input, tools and output from risk assessment of a product

The process uses a number of data for input as indicated in the figure:

- The product itself.
- Data and further information about the product.
- Data about different possible injury scenarios and/or real accidents
- Injury data specific for the case.
- Test reports listing non-compliances that may indicate product hazards

A number of tools are identified in the figure

- Databases with e.g. anthropometric data, statistics on human behaviour, etc.
- General injury statistics

- Toolboxes like for instance the Chemrisks toolbox.

The output from the assessment will be

- The estimated risk level
- The estimated uncertainty in the risk level

10.1.3 Definition of essential terms in risk assessment of consumer products

In order to be sure that different organisations and Member States understand each other's risk assessments, all parties should use the same terminology with the same definitions. Several different frameworks of risk assessment are used, each with its own definitions. Some are common in engineering and accident prevention, in particular the framework adopted by ISO for the safety of machines (ISO 12100); others are common in food and feed, and in chemical safety. The ISO definitions are used in this book, as most RAPEX-notifications deal with mechanical risks. The differences between these two frameworks, including illustrative schemes are described in Annex B – Different frameworks of risk assessment.

Hazard

Source of danger involving the chance of being injured or harmed. A means of quantifying the hazard in a risk assessment is the severity of the possible injury or harm.

Product hazard

Hazard created by the properties of a product.

Risk

Balanced combination of a hazard and the probability that damage will occur. Risk describes neither the hazard, nor the probability, but both at the same time.

Risk assessment

Procedure for identifying and assessing hazards, consisting of three steps:

- identification of the seriousness of a hazard;
- determination of the probability that a consumer will be injured by that hazard;
- combination of the hazard with the probability.

Risk level

Degree of risk, which may be 'serious', 'high', 'medium' and 'low'. When the (highest) level of risk has been identified, the risk assessment is complete.

Risk management

Follow-up action, which is separate from risk assessment and aims to reduce or eliminate a risk.

(All definitions according to the RAPEX guidelines [23].)

10.1.4 Why should you use risk assessment?

Risk assessment is a core tool for market surveillance of product safety.

First, every market surveillance authority will have to set priorities for its market surveillance activities, because the number of products on the market is enormous and the resources are limited. The risk associated with a product group will obviously be an important criterion when setting priorities. Priority setting can take place on a strategic level (e.g. long-lasting focus on toys) and on a more tactic level (e.g. a project on wooden jig-saw puzzles for children in a particular year).

Secondly, it is necessary to determine the risk of specific products in the daily control actions. In particular, the effective operation of the system of rapid exchange of information on products presenting a serious risk (RAPEX) requires the authorities to use a fast, fact-based and consistent method of risk assessment.

Risk assessment is also an important tool for product safety work outside the market surveillance authorities. As an example, it should be used by designers, constructors and producers as part of the compliance assessment that ensures that only safe products are placed on the market.

10.1.5 How do you use the result of a risk assessment?

The result of a risk assessment is one important input in the risk management procedure. The purpose of the whole process is to control the risk. Examples of other inputs into risk management include the number of products on the market, the benefit of the product, the effort necessary to lower the risk, etc.

Risk management varies in different sectors, and low risk does not mean that no action is necessary. Technical progress may have led to a high safety level in certain sectors as defined and agreed upon in harmonised standards.

In general, the level of risks that society accepts is determined by culture, risk perception, technical development, etc.

10.1.6 Risk assessment, conformity assessment or compliance?

Risk assessment should not be confused with compliance to legislation or conformity assessment (please refer to the “Guide to the implementation of directives based on the New Approach and the Global Approach”, also known as the “Blue Guide” [ref]; the figure below aims to clarify the differences):

- The basis of the New Approach is that only products in compliance with legislation or harmonised standards should be placed on the market. Authorities will take measures if products are found not to be in compliance after consultation with the producer). This is referred to as ‘compliance assessment’ in the figure below.
- Conformity assessment is the process by which a producer verifies (or asks a third party to verify) the compliance in principle **before** the product is placed on the market; this verification process continues during production. Conformity assessment implies checking if a given product meets all essential requirements (normally set out in a Directive and specified in harmonised standards). Conformity assessment includes a risk assessment: according to the “Blue Guide”, manufacturers need to carry out risk assessment to determine the essential requirement applicable to the product. Risk assessment is also undertaken during the production stage whenever a non-conformity is revealed.
- Risk assessment implies assessing the risk presented to consumers, animals, or property by a given product. Risk assessment may also be carried out by an authority or a producer when a hazard is found in a product to assist deciding on adequate and proportionate measures. It can be a tool both before and after placing a product on the market.

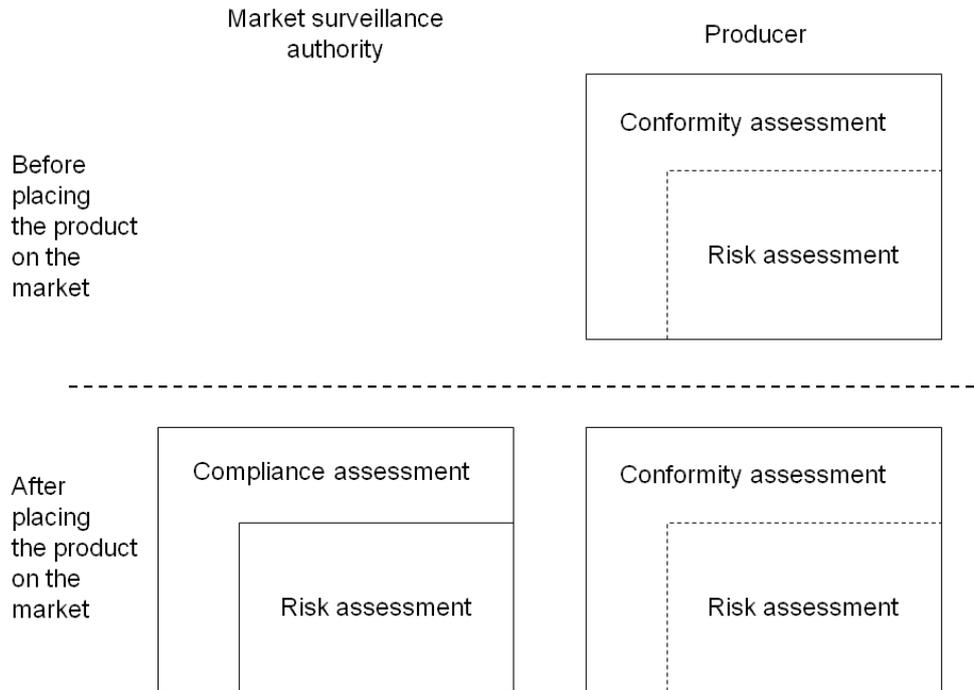


Figure 6 - Relations between conformity assessment, compliance assessment and risk assessment.

This follows the definition of “producer” that is given in the GPSD: A “producer” is to be understood as the manufacturer of the product, the manufacturer's representative, the importer into the EU of the product or other professionals in the supply chain, whose activities may affect the safety properties of a product. (The complete definition is found in the directive 2001/95/EC, article 2, item e.)

As can be seen from the figure, risk assessment is a step in conformity assessment and also plays a role if non-conformity is found. Thus, risk assessment is always carried out even if the user is not explicitly aware of it. Often conformity assessment is done using a harmonised standard. (This will be the case for a lot of products that are covered by New Approach Directives.) A harmonised standard can be expected to lay down all safety requirements, which means that the user can presume that the product conforms to the safety requirements if it complies with the standard. This implies that the risk assessment is taken care of by the standard, i.e. the requirements in the standard set out a safety level that has been assessed to represent a satisfactory level of risk to the consumer. The advantage of standards is that they present very detailed definitions of the requirements given in the directives. This eases the risk assessment for the producer by changing it from an open and broad analysis to a simpler checking of fulfilment of a number of requirements. Nevertheless, it has to be checked in all cases whether the product has features that are not covered by the standard and which may require a risk assessment on their own.

Conformity assessment is carried out by the producer before a product is placed on the market but it will also be a part of the production control that the producer must undertake after the product has been placed on the market. The purpose of the production control conformity assessment is to ensure that all batches of a production stay in conformity. Risk assessment would in general play an insignificant role in this phase of the production unless the producer discovers an unsafe non-conformity with the product. In that case the producer would use risk assessment to decide on the correct (proportionate) voluntary measures to be taken.

Market surveillance authorities may check if a given product (that is on the market) meets all requirements in a directive. This process includes among other things assessing a number of formal requirements as well as a number of safety related requirements. Again the assessment would often be done using a harmonised standard. The major difference to the conformity assessment carried out by the producer is that if the authority finds a non-conformity in the product then the authority would have to carry out a risk assessment (using (one of) the methods from this module) to decide on the risk level associated with the non-conformity. If the producer discovers a non-conformity during the conformity assessment the producer would have to modify the product to bring it in conformity. (If the product was already placed on the market then the producer would furthermore need to make a risk assessment to decide what measure should be taken against products already being on the market.)

It is important to realise that non-conformity does not necessarily imply a risk as is shown in the following two examples.

Example 1: A toy has been found by the market surveillance authorities to have sharp edges. A sharp edge in a toy presents a non-conformity because the toy does not comply with the requirements laid down in EN 71-1. The market surveillance authorities need to do a risk assessment to decide which measure is proportionate to the risk:

- What is the potential hazard? Most likely it has to do with cutting of fingers but it might be worse depending upon the accessibility of the sharp edge, the sharpness and other geometrical data.*
- How likely is it that the injury scenario will happen? This will also depend largely upon the accessibility of the edge but also on the exposure to the toy, the numbers it is sold in, the age of the users, etc.*
- Does this lead to a serious risk or another risk level requiring action?*

Based on the result of the risk assessment and the other elements mentioned in section 10.1.5 above it is decided what to do with the products on the market: Do nothing, inform the consumers, stop the sales, or recall the products from the consumers.

A producer who discovers a sharp edge as part of a quality control programme will have to go through the same analysis to decide on the correct voluntary measure. (He or she might want to adopt more restrictive measures than required by the authority to avoid negative impacts on the brand.)

Example 2: The CE-marking on a toy is 3 mm high. The Toys directive requires a minimum height of 5 mm. Therefore the product does not comply with the directive and it must not be placed on the market. If the producer discovers this non-conformity on a toy that is placed on the market he would carry out the risk analysis. In this case, it will show that there is no immediate injury risk associated with the non-conformity. A producer might therefore choose to change the printing of the CE-marking on future deliveries without taking further action.

10.2 Performing the risk assessment

10.2.1 When do you start a risk assessment?

The starting point for a risk assessment of a specific product can be an incident that happened with a product. A consumer may complain about it, a supplier may report a problem, or the media may signal safety problems. Another possibility is that your own organisation systematically monitors trade, gathers information about certain products on the market and takes samples; in this process, a product may be found that looks unsafe at first sight.

From each starting point the same approach can be followed: find more information about the product, request data from the supplier, possibly perform tests, and start a risk assessment.

The main difference is that in case of an incident or complaint the focus will usually be on one scenario: something has already happened and next step is to analyse whether it is likely to happen again. However, one should distinguish between risk assessment and accident investigation. The purpose of an accident investigation is to find out what happened and to clarify what the injury scenario was. Furthermore it usually includes an assessment of the product in question. The purpose of a risk assessment to decide what level of risk is associated with the hazards in a product. Accident data is used in this analysis to assist defining the injury scenarios and estimate the probabilities but in a general way.

10.2.2 A presentation of the risk assessment process from the data collection to the resulting risk assessment

Risk assessment always focuses on three basic questions [6]:

- 1) What can go wrong?
- 2) If it does happen, what are the consequences?
- 3) How likely is it that it will happen?

In consumer product risk assessment, these questions can be translated to formal steps, using the terms defined in 8.1 (please refer to the figure):

- identification of the hazards, hazardous situations and harmful events (output: One or more injury scenarios);
- characterisation of the hazard and the harm (output: Severity of consequence; measure of damage);
- estimation of the likelihood of the hazardous situations, harmful events and various types of harm (output: Likelihood; level of exposure; probability of injury scenario).

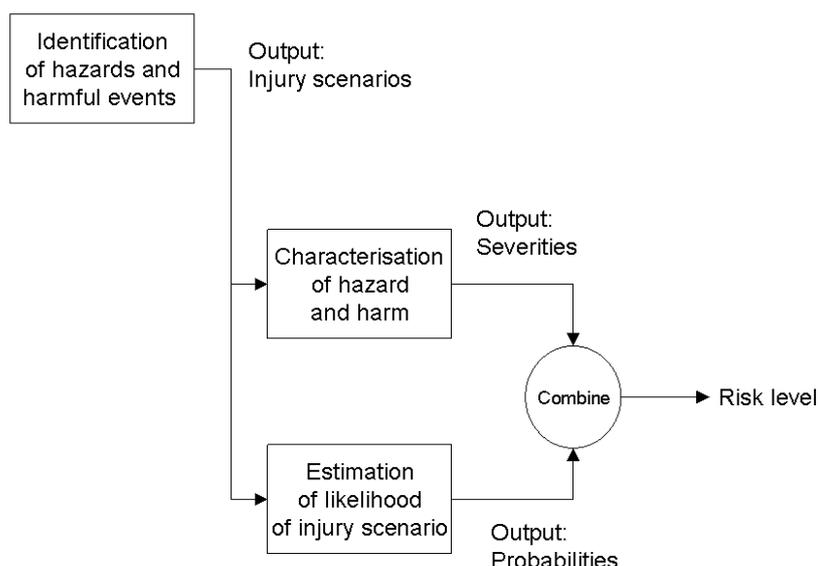


Figure 7 - The steps in risk assessment.

It is important to realise that risk is a combined measure of the likelihood and the severity. For example, all electric household appliances operate on 230 V. One injury scenario would be that the user touches a live wire and gets an electric shock, which can be fatal. However, the producer will normally work to make such a scenario very improbable by insulating the wires and keep all live parts inaccessible behind parts of insulating material. Therefore the probability of the harm and therefore the **risk** of the electrical equipment will be very low.

10.2.3 General procedure

The RAPEX Guidelines [23] constitute a harmonised procedure for supporting decisions on unsafe products. Its main features are:

- define the product under assessment;
- identify the hazard(s) under consideration;
- identify the type of consumer that is concerned;
- describe how the hazard inflicts on the consumer. This will usually result in several injury scenarios per product;
- use the combination of injury type and body part to estimate the severity of each injury scenario (table of examples);
- assess the likelihood each injury scenario by breaking it up into smaller steps that are essential for the injury. Find data on the likelihood of each small step;
- combine severity and probability in a matrix to determine the level of risk.

The procedure is illustrated in the next figure.

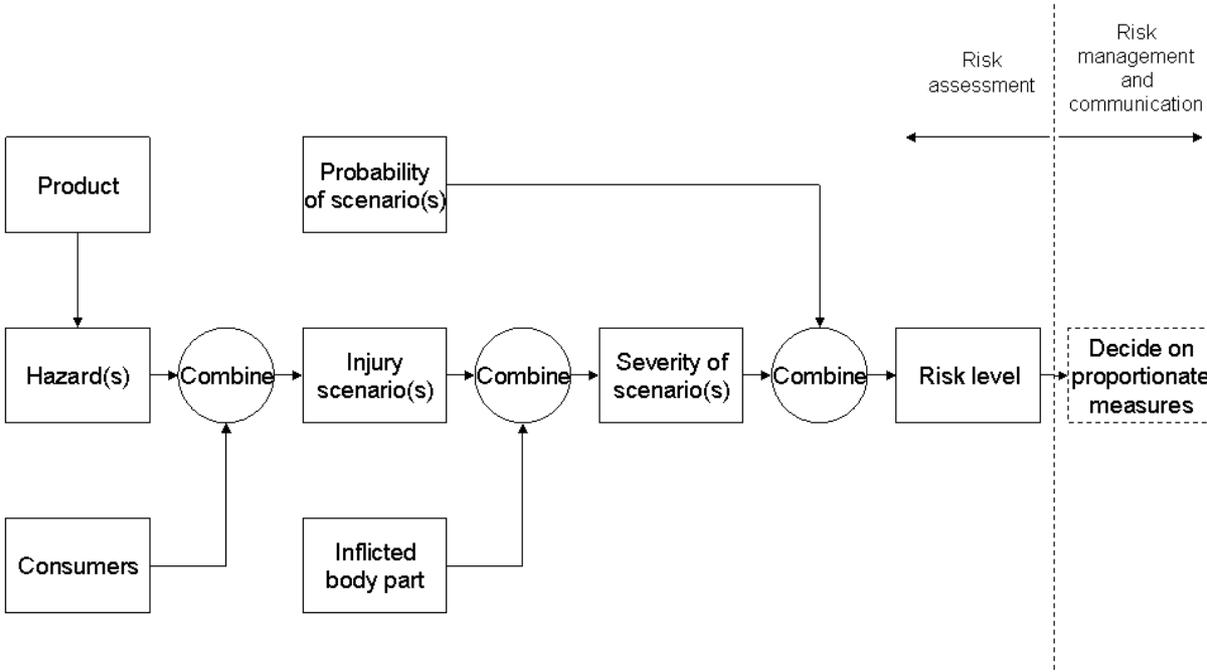


Figure 8 - Overview of the risk assessment procedure. (Please note that what is called "Risk management and communication" in the figure can also be referred to as "Risk Reduction" in other models for risk analysis. Please also see Annex B.)

The output from the risk assessment is an estimate of the risk level. The risk level is one of the inputs to the further risk management process and the decision on proportionate and adequate measures.

The European Commission has developed an IT tool that will guide and support the risk assessor. It is available on the Commission's website [24]. It is used in the following example to illustrate the risk assessment process. Other tools exist and can be used, but the IT tool from the Commission's website is the benchmark if two tools produce different results.

Example: RAPEX notification no. 0125/06 deals with a cross pane hammer with metal handle and black plastic grip. The hammer has three shortcomings:

1. The hammer head is insufficiently fastened on the handle.
2. The plastic grip breaks under normal strain.
3. The plastic grip is insufficiently fastened to the shaft of the hammer.



Figure 9 - RAPEX notification no. 0125/06 deals with a hammer where the handle breaks.

The steps in the risk assessment procedure for this example are as follows:

1. Define the product under assessment
Cross pane hammer with metal handle and black plastic grip.

This information is entered in the first two fields in the Risk Assessment Tool. In the 3rd field you can add a more detailed description of the case, the product or other relevant information. Please see figure 9a.

Risk Assessment for I	
General Information and Overview	
Product	Risk assessment
Product name: Cross pane hammer	Firs
Product category: Tools	Las
Description: The hammer has a metal handle and black plastic grip.	Organ
	A
Product risks - Overview	Scenario
Overall risk:	

Figure 9a – Fill in product name, product category and any additional description.

2. Identify the type of consumer that is concerned

The product is normally used by adults.

Children may want to stand nearby to watch the adult working.

This information is entered by creating a new scenario (click on the button "Create a scenario") and choosing from the drop box in the field Consumer type. Here "other consumers" has been selected (figure 9b).

The screenshot shows a web-based form titled "Risk Assessment for RAPEX". On the left, there is a vertical list of input fields, with the text "plastic grip." visible in one of them. To the right, under the heading "Risk assessor", there are four input fields: "First name", "Last name", "Organisation", and "Address". Below this is a "Scenario summary" section. At the bottom, there is a "Consumer type" dropdown menu that is open, displaying a list of options: "Other consumers" (highlighted in blue), "Select One", "Very young children", "Young children", "Older children", "Vulnerable consumers", and "Very vulnerable consumers". Above the dropdown menu, there is a link that says "Expand all / Collapse all". At the bottom right of the form, there is a button labeled "Send: Til".

Figure 9b – Select appropriate consumer type.

3. Identify the hazard(s) under consideration

The plastic grip has insufficient mechanical strength which means that it breaks under normal strain when the user hits a hard surface so that parts fall off and hit the user (only one hazard is considered in this example).

This is entered in the fields describing the product hazard. First the user must select the hazard group. It is selected from the drop box. Here "Kinetic energy" is selected as the hazard has to do with parts that fly around with dangerously high speed, see figure 9c.

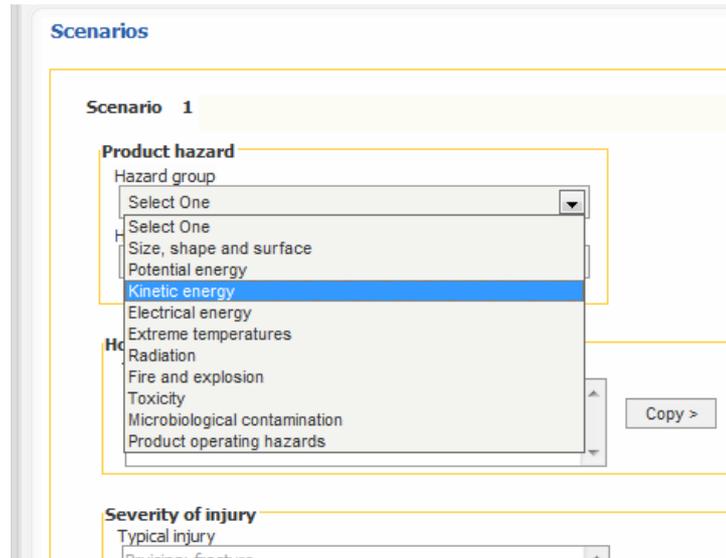


Figure 9c – Select the appropriate hazard group (describing the nature of the hazard).

Next the user must select the hazard. This is chosen from the drop box with the detailed description of the hazard. Here we choose "Flying parts". See figure 9d.

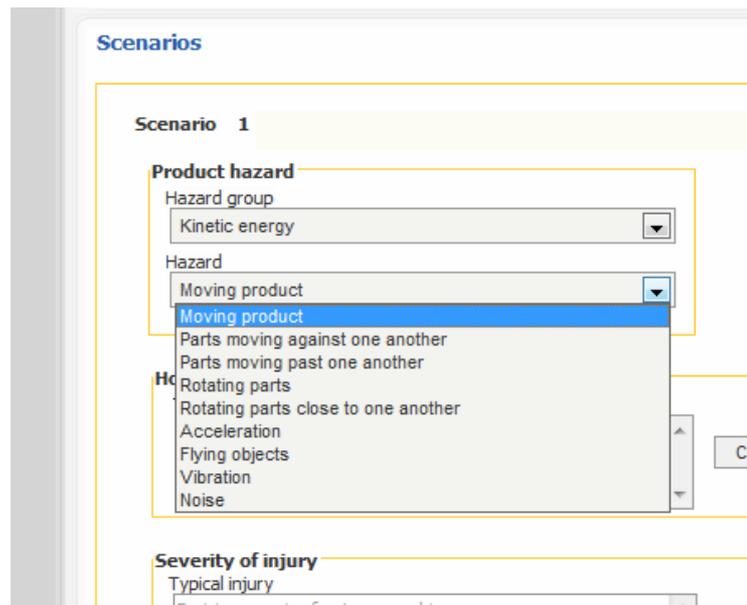


Figure 9d – Select the appropriate hazard for the chosen hazard group.

4. Describe how the hazard causes an injury to the consumer

The upper part of the hammer bounces back and hits the user's arm. This causes bruising of the arm. (Only one injury scenario is developed in this example.)

This information is entered in the field "Your injury scenario" as shown in figure 10:

Expand all / Collapse all

Product

Product category

Product description

Consumer type

Other consumers

Consumers other than vulnerable or very vulnerable consumers

Product causes an injury to the consumer

Injury scenario

The line of movement of the product is being hit, crushed or run over

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Your injury scenario: Describe.

The upper part of the hammer bounces back and hits the user's arm. This causes bruising of the arm.

Your injury

Fracture; bruising; crushing

Your injury

Select One

Figure 10 - The injury scenario parties described in the field "Your injury scenario".

- Use the combination of injury type and body part to estimate the severity of the injury scenario

This is done in the section "Severity of injury". The severity of the injury "Bruising of arm" is found in two steps. First you select the appropriate nature of the injury in the drop box in the field your injury as shown in figure 11. Here we select "Bruising (abrasion/contusion, swelling, oedema)".

Your injury scenario: Describe.

The upper part of the hammer bounces back and hits the user's arm. This causes bruising of the arm.

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Your injury

Select One

- Select One
- Allergic reaction or sensitisation
- Amputation
- Bruising (abrasion/ contusion, swelling, oedema)**
- Burn/ Scald (by heat, cold, or chemical substance)
- Concussion
- Crushing
- Dislocation
- Electric shock
- Entrapment/ pinching
- Eye injury, foreign body in eye
- Fracture
- Hearing injury, foreign body in ear
- Ingestion
- Internal airway obstruction
- Irritation, dermatitis, inflammation or corrosive effect of substance
- Laceration, cut
- Long-term damage from contact with substances or from exposure
- Microbiological infection
- Neurological disorders
- Piercing, puncturing
- Poisoning from substances (ingestion, inhalation, dermal)
- Sprain, strain, musculoskeletal disorder
- Submersion / Drowning
- Suffocation / Strangulation

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Figure 11 - The nature of the injury is selected in the field "Your injury".

The choice of "Bruising" means that the web tool provides four choices for the severity of the injury as shown in figure 12.

The bruising of the user's arm if hit by the hammer head seems to fit best with the category "< 50 cm² on body", which translates to a level 1 injury so the first option is chosen.

Figure 12 - The severity level is selected among the options offered.

6. Assess the likelihood of each injury scenario by breaking it up into smaller steps that are essential for the injury. Find data on the likelihood of each small step.

The selected injury scenario is quite simple, as it only breaks up into two steps:

Step 1: Handle breaking (with an estimated probability of $p = 0.5$ (50% probability): experts estimated that a large proportion of these products will break during their lifetime. Where possible, test reports should be taken into account to confirm such an estimate).

Step 2: The upper parts hits the arm (with an estimated probability of $p = 0.2$ (20% probability): as the handle will usually break while someone is holding it and hits a hard surface, the hammer head will bounce back more or less in the direction of the user, but if the blow with the hammer was not perpendicular to the surface, the hammer head may also miss the arm. See also comment to Step 1).

Probability factors can be determined in many ways, e.g. based on test data, based on accident statistics, selected from the PROSAFE databases with probability factors, etc.

The steps and their probability are entered in the fields under "Probability of an injury" as shown in figure 13. This scenario has 2 steps so one extra step has to be added by use of the button "Add a Step to Injury".

Spinal cord causi

Probability of injury

Step(s) to injury : Describe - 1 step per box

Handle breaks Probability > 50 %

The upper parts hits the arm. > 1/5

Add a Step to injury

Severity of injury level	Calculated probability	Overall probability
1	0.1	> 1/10

Scenario 2

Product hazard

Hazard group
Select One

Hazard
Select One

How the hazard causes an injury to the consumer

Typical injury scenario

Your injury scenario: Desc

Figure 13 - The steps and the probabilities of the steps in the injury scenario are entered under "Probability of the injury".

- Combine severity and probability to determine the level of risk.

The resulting probability is calculated by the programme and compared to a scale with indicative statistical values. The resulting overall probability is combined with the severity of the injury and the resulting risk of the scenario is found. The programme displays the result in the bottom line of the scenario as shown in figure 14.

Severity of injury level	Calculated probability	Overall probability	Risk of this scenario
1	0.1	> 1/10	Medium risk

Create a scenario

Figure 14 - The result of the risk assessment.

In this case the probabilities of each step in the injury scenario are multiplied to give >0.1. (Note that the programme only indicates the calculated probability as "0,1" even though it would be more correct to say ">0.1" as the result arises from multiplying the sub-probabilities ">50%" and ">1/5".)

This translates to an overall probability of ">1/10" as indicated.

The severity of the injury was level 1 (step 5).

The combination of ">1/10" and level 1 gives "medium risk" as can be seen in figure 15.

The combining of the severity and the probability is based on the table from the RAPEX guidelines [23]. The table is shown in figure 15.

Probability of damage during the foreseeable lifetime of the product		Severity of Injury			
		1	2	3	4
	> 50 %	H	S	S	S
	> 1/10	M	S	S	S
	> 1/100	M	S	S	S
	> 1/1,000	L	H	S	S
	> 1/10,000	L	M	H	S
	> 1/100,000	L	L	M	H
	> 1/1,000,000	L	L	L	M
	< 1/1,000,000	L	L	L	L

S –	Serious risk
H –	High risk
M –	Medium risk
L –	Low risk

Figure 15 - The matrix that is used for combining severity and probability

The above procedure considers a product that is unsafe in itself, e.g. a toy with small parts that can be swallowed, an electrical appliance that can cause fire or electric shock, a product with sharp edges, etc. The procedure can however also be used to assess the risk caused by protective equipment, i.e. products or equipment that is intended to protect the user against some risk even though such products are seldom unsafe in themselves. Such non-compliant products lead to a dangerous situation because the user relies on their protective properties and changes his behaviour accordingly. Many users will for instance not use a chain saw without protective trousers, glasses and helmet because they consider the risk for being injured too high. If they wear non-compliant protective trousers they will believe they are well protected and use the chain saw without further considerations.

When assessing the risks with such (non-compliant) products, the risk assessor should develop scenarios that presume that the user employs the protective equipment thereby exposing himself to a dangerous situation without knowing.

10.2.4 Getting the necessary data for the risk assessment

In the beginning of 10.2.2, the three questions that are relevant in risk assessment were presented. If an evidence-based risk assessment is to be carried out, data is needed for every question. The below text provides some suggestions for the type of data and how to access them.

What can go wrong?

A first impression of actual product use can be obtained from the instructions for use, but this includes only the use as intended by the producer. In order to get a more realistic picture, you could start with questions such as: will children or elderly people have access to this product and are they likely to use it for its purpose? How may a person be using a product in view of product functions and user goals? If there is a detailed description of an (almost-) accident this will obviously provide additional ideas of the use. In addition, it may be feasible to perform product use studies with the product, or information about such studies may be available in the scientific literature. It might also be relevant to search for information in databases with accident statistics such as the European injury database, IDB. (The public part of this database can be accessed on the website <https://webgate.ec.europa.eu/idbpa/>). A useful overview of questions that may help in finding relevant injury scenarios can be found on the EuroSafe website: <http://www.eurosafe.eu.com>; look under *Knowledge base* and then *Risk assessment*.

The answer to the question should be a list of injury scenarios. Often a product has several hazards that should all be analysed (unless it is immediately obvious that some of the hazards have very little risk associated with them). You will also normally find that one specific hazard may result in several likely injury scenarios. Again, one should analyse all scenarios unless it is obvious that some scenarios end up in an acceptable risk. However, one should be careful because it is usually complicated to anticipate the outcome of a scenario without doing the complete analysis.

Example: The cross pane hammer from the previous example (RAPEX notification no. 0125/06). Analysing the product and its shortcomings will produce a number of possible injury scenarios, e.g.:

- The hammer head breaks when a person uses the hammer and hits a hard surface. Parts of the head fly off and hit the user's eye.*
- The hammer head breaks when a person uses the hammer and hits a hard surface. Large parts of the head fly off and hit the user's head.*
- The hammer head breaks when a person uses the hammer and hits a hard surface. Parts of the head fly off and hit the user's hand, foot or other body part*
- The handle of the hammer slides off the shaft when a person swings the hammer. The upper part of the hammer flies off and hits the head of a nearby person (perhaps a child).*
- The handle of the hammer slides off the shaft when a person swings the hammer. The upper part of the hammer flies off and hits the body of the user or a nearby person (perhaps a child).*
- The handle of the hammer breaks when a person uses the hammer and hits a hard surface. The upper part of the hammer bounces back and hits the user's arm.*

Note that it is not immediately obvious which of these scenarios will lead to the highest risk.. If a part of the hammer hits the user in the eye (the first scenario), the result might be blindness on that eye. This is in general considered to be a more serious injury than getting a scar in the face, which might be the outcome of the second scenario. If, however, the probability of getting hit in the eye is sufficiently much lower than the probability of getting hit in the face, then the second scenario would turn out to have the highest risk level.

If it does happen, what are the consequences?

It is essential to evaluate the final outcome of each scenario that has been identified. This requires qualitative data such as the type of injury that may result from a mechanism, and quantitative data such as the severity, medical treatment need, etc. Preferably, a detailed injury mechanism should be given.

The result should be that the injury scenario is linked to one of the four levels of severity in the RAPEX guidelines.

How likely is it that it will happen?

The probability that a given hazard will lead to an injury is often very difficult to estimate. In case of a reported injury, reality show that it is possible, but could it happen again? Some Member States have a system for collecting accident and injury data; the authorities of those Members States should use these data wherever possible. However, you should take into account that the data rarely relate to the exact type, brand and model of product that you are interested in for your risk assessment. They usually refer to a complete class of products. Nevertheless, injury data may support the conclusion that a particular scenario is quite likely with this type of product.

In the approach of the RAPEX Guidelines, each scenario is broken up into smaller steps that are essential for the injury. Several considerations have to be made:

1. Product characteristics.

How likely is it that the hazard or shortcoming will occur during the lifetime of the product? (Example: What force is required for the hammer to break, and how does this compare to the forces that may occur when using the hammer? Do all products share the same characteristics, or is there a distribution of test outcomes?)

If the product has been tested according to a (harmonised) standard, the results may help the process. The threshold values in the standard define the benchmark that the product must meet to be presumed safe so the test result (and the magnitude of the deviance from the threshold value) will tell something the probability that accidents will happen. (Example: The standard EN 71-1 prescribes that a small part must withstand a pull of 90 N to be securely attached to the toy. If a small part becomes detached at a pull of 10 N, it is far below the threshold value from the standard. Therefore it is quite likely that a child can detach the part, so the probability gets close to 100 %.)

Some standards prescribe that a number of items must be tested to pass the test. Non-compliance will in these cases mean that a share of such a test batch doesn't meet the requirement in the standard. An estimate for the probability will be the proportion of non-conforming products relative to the total test batch. (Example: 50 lighters are tested. 5 fail. The probability is estimated to 10 %.)

2. Exposure to the hazard.

How likely is it that people will actually be exposed to the hazard, again during the lifetime of the product? (Example: How likely is it that someone will be hit by pieces of the hammer head flying off?) Does exposure depend on specific behaviour or is it sufficient if the victim is near?

3. Injury mechanism.

How likely is it that the injury occurs given that the product fails? (Example: How likely is it that the broken part of the hammer hitting the user will cause the injury?)

In the example with the breaking hammer, the probability that an object that hits an eye actually causes an eye injury will depend upon the energy and shape of the object, and information on this probability could be available in the medical literature.

It will be clear that data to estimate the probability of each step may come from different sources: *product tests* can be performed to get information about the critical product characteristics; *product use studies and ergonomics research* may provide information about frequency of actions, forces used, etc. To help market surveillance authorities, PROSAFE has established a database with examples of probability factors that can serve as inspiration with probabilities are determined for the specific case.

When building the scenarios and estimating the probabilities it may be helpful to recall the underlying principles as illustrated in the figure below. In principle, one should draw up an event tree as indicated in the figure. Each step in the tree must list all possible outcomes so that the complete tree would describe all possible events and consequences of the particular product. That is, in principle one should on the extreme right have listed all the outcomes that would be the result of placing the entire population of the specific product (or batch of products) on the market. Each scenario will be associated with a probability.

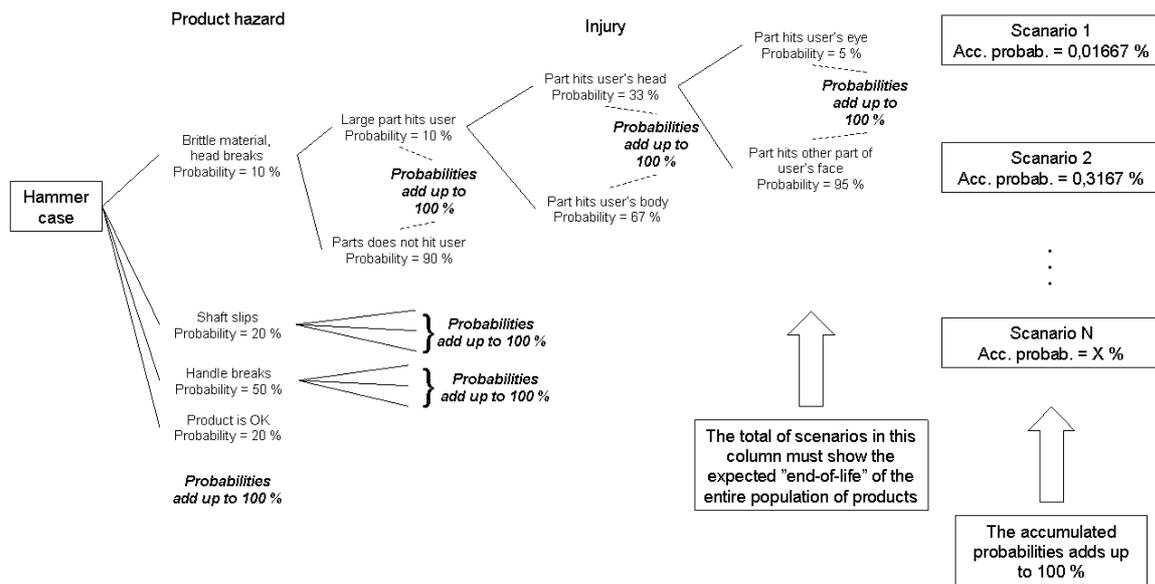


Figure 17 - The principle behind calculating the probabilities is that the sum of the probabilities for each event adds up to 100 %.

The result of this should be that the injury scenario is linked to one of the eight levels of probability in the RAPEX guidelines.

The entire process appears at first sight to be rather complicated but is still realistic. Risk assessment is more comprehensive than conformity assessment and it is found to be important to make the outcome as objective and correct as possible. Therefore, it seems necessary to spend the effort to gather the background data. An authority should however observe that the time to carry out a risk assessment would decrease as experience with using the method is built up and as examples of "standard risk assessments" are collected.

The risk assessor should be aware that the risk assessment method is neither perfect nor as scientific as it may suggest, but it is a plausible approach to assessing the risk of a product.

Is the risk assessment realistic?

The risk assessor should end all risk assessments by doing a final "reality check". This could for instance be done by use of accident statistics, the manufacturer's complaints register or other data from the manufacturer and the purpose would be to check that the overall probability of the total risk assessment seems valid. The risk assessor could for instance calculate the likely number of accidents per year if the probability was true.

Example: An electrical appliance has a non-compliant plug that will cause an electric shock to the user when then user grabs the plug to pull it out of the AC mains. The risk assessor has estimated the probability for a fatal electric shock to be 1/5. The manufacturer informs that the product is a bestseller that is sold in tens of thousands every year. If the probability and the number of items sold were correct, it would mean that the authority would see thousands of fatalities every year from that product alone. This is most likely not the case so the probability or the injury scenario has to be reviewed.

When reviewing the risk assessment – probably with the help from the manufacturer or the importer – it is worth keeping in mind that market surveillance people tend to be "worst case thinkers" whereas manufacturers tend to be too optimistic.

10.2.5 Sensitivity analysis

The estimate of the probability is often based on a number of assumptions and not only on exact numbers. Often it is difficult to make a more precise estimate than an indication of the order of magnitude. Therefore, it is also important to state the level of uncertainty on each of the factors in 10.2.2 because the influence of such uncertainty should be analysed in a sensitivity analysis. Also the uncertainty in the severity of injury should be included in such an analysis.

The purpose of the sensitivity analysis is to clarify how sensitive the result of the risk assessment is to variations in the estimated probabilities or in the severities.

A very practical way of doing the sensitivity analysis is to calculate how much higher or lower the probability should be to change the risk level. Then you evaluate if such a change in probability is realistic.

Another approach is to repeat the risk assessment as in 10.2.2 using the highest probabilities that one could estimate for each step (worst case approach). The resulting risk level will then be the highest level found in this assessment.

If it is the same as the originally estimated level, then the uncertainties on the probabilities or severities do not have an impact on the result (which of course is the ideal case).

If the highest possible risk level is higher than the originally estimated level, one has to go back into the risk assessment to see if anything can be done to improve the estimates of any of the individual factors. If this is not possible, one should at least note that one of the injury scenarios might have a more severe outcome than estimated. This should be taken into account when drawing the conclusion of the whole risk assessment. If for instance the analysis has revealed several injury scenarios each with a moderate risk and the sensitivity analysis has shown that most of the injury scenarios could result in serious risk when the uncertainty is taken into account, then the most correct conclusion of the whole case might be that the product carries a serious risk.

An alternative is to try to improve the estimates of the probabilities by consulting more experts. If the uncertainties on one or more of the probability factors (or on the outcome) is high, it is a clear sign that the risk assessor should consult more experts or undertake more testing (if feasible) to obtain better estimates of the uncertainties or an improved understanding of the scenario leading from the hazard to the injury. The authority could also ask the manufacturer to analyse and comment the risk assessment.

10.2.6 Reporting a risk assessment result

The result from the risk assessment must be reported to ensure that the considerations are registered and that they can be used in the proper context. (Normally risk assessment is done as part of a market surveillance case or perhaps even an investigation of an accident.) If the report has a suitable form, the market surveillance officer might be able to use it with little modification in the communication with the producer. On the other hand it is important that it has an appearance so that it can be produced in a court case should that be requested.

To ensure proper reporting it is recommended to use a reporting form that is simple, easy to use and that does not require the user to fill in unnecessary information. The advantage of using a form is also that it assures that all necessary information is included.

A risk assessment report should as a minimum include the following headings:

1. Identification of product and case, description of the context.
In most market surveillance cases most (or all) of this information is given if a reference is made to the case identification that the authority uses (e.g. a case number).

2. Description of the hazards.
This could be a list with (verbal) description of the identified hazards in the product. The hazards are sometimes identified from a test report with non-compliances.
3. Description of injury scenarios and sensitivity.
Each injury scenario should describe the injury type and location, the severity of the injury, the probability of the injury, the resulting probability of the total scenario and the risk level. Often it will also be relevant to describe the sensitivity of the scenario, i.e. the impact on the risk level when the input probabilities vary.
4. Conclusion
The conclusion should present the overall assessment of the product, e.g. “serious risk” (requiring rapid action).
The conclusion should be drawn up to reflect as transparently as possible how the resulting overall risk level is derived from the estimated levels in the table.

The web tool that has been developed by the European Commission [24] allows the user to print a report with the resulting risk assessment. The report from the tool has been used for the reporting of the model risk assessments in Annex C.

10.2.7 Quality assurance

One of the drawbacks of the risk assessment method is that it includes a lot of estimation and individual judgements. The aim of the method is to support the market surveillance officer as far as possible by replacing estimation by looking up values in a table and by forcing the estimates to be as transparent as possible. Still there is a risk for subjective judgements in the method.

The best way to handle this is by doing the risk assessment in pairs or groups where all participants in common carry out the risk assessment. To prepare the risk assessment it is recommended that all participants do individual risk assessments before the common assessment.

This might be difficult to achieve in practice. Often the authority would look for ways that take less time and are less resource demanding. Two methods are described here:

- The lowest recommendable level of quality assurance is to have one market surveillance officer to do the risk assessment and have another person to check the report afterwards. The second person should co-sign the risk assessment report or should file a note on the case with his or her comments to the report.
- In projects where many similar products are investigated, it might be possible to do the risk assessment of the first product in common in a group and use this as a base for the assessments of the other products. Again, it is recommendable to have another person to check all the final risk assessments.

10.3 Pitfalls that may occur in practice and advice to avoid them

This chapter addresses a number of practical problems that the EMARS Risk Assessment team has seen when performing the analysis for specific cases and suggests approaches to avoid these pitfalls.

10.3.1 Must I perform a risk assessment every time?

Often the risks are so obvious that it seems superfluous to do a risk assessment using the method from 10.2. If the user can touch live parts in an electrical appliance, then “everybody” immediately knows that it is dangerous, so why bother about the paperwork?

It is considered best practice always to carry out a risk assessment.

Firstly, non-conformities to harmonised standards are not sufficient for market surveillance authorities to take measures unless they make the product dangerous. The producer is not obliged to follow a harmonised standard and therefore non-compliance with such a standard may not necessarily mean non-conformity with the (safety) requirements of the directives. Therefore, the legal argument behind a measure against non-conformity must describe the associated risk.

Secondly, market surveillance cases end up in court now and then because the producer or importer may decide to challenge the opinion of the market surveillance authority. In such cases, the authority will have a stronger case if it can refer to a risk assessment that was carried out and documented when the proportionate risk management measure was decided.

Of course, many types of shortcomings are generally agreed to be dangerous (e.g. small parts in toys, accessible live parts in electrical appliances, etc.) and many market surveillance inspectors would feel it unnecessary to go through the complete procedure repeatedly for the same type of shortcomings. An alternative would be to develop a list of “standard risk assessments” for those common shortcomings, which the inspector could refer to. Such a “standard risk assessment” could also include a standard phrase that could go into the legal letter to the producer.

10.3.2 Serious injury = serious risk?

If an injury scenario leads to a serious injury, you might expect (or want?) to arrive at a serious risk.

As shown in 10.1.5 this will not necessarily be the case. Risk also depends on the probability of the scenario. If the scenario is virtually impossible then serious injuries might still lead to a moderate or even low risk.

10.3.3 Risk due to a product hazard versus risk due to inadequate functioning

A special case is the risk assessment of products that are supposed to have a kind of protective function, for example personal protective equipment, socket protectors, or fire extinguishers. These products do not necessarily have shortcomings that are dangerous in themselves (e.g. sharp edges where the user can get cut). Therefore the primary hazard is not a property of the product. Rather, the risks are associated with a failing or insufficient protective function.

The approach to risk assessment is not fundamentally different, but you will need to include injury scenarios in which the product does not provide the required protection (e.g. the fire extinguisher doesn't work). This means that the person is exposed to the hazard that the equipment was supposed to protect from.

10.3.4 Small probability but many products

Some products may have shortcomings that can cause serious injuries but the associated probability is very low. Then, a risk assessment will reveal that the risk level is low or acceptable, which may seem unacceptable. If the product is sold in very large numbers then the exposure for society as a whole would be high. This would imply that serious accidents might happen at regular intervals. If furthermore it is easy to make the product safer, the market surveillance authority would have a problem explaining its inactivity based on the low or acceptable risk level.

Such observations should be noted in the report and taken into account in the risk management phase, when the authority decides which measures would be appropriate to deal with the risk. But the risk assessment and the resulting risk level should not be modified. The problem lies in the society's perception of a given risk, which may be different from the objective result of the risk assessment. (In general, people will not accept fatalities related to

any consumer product – even though they live with several dozens of traffic fatalities per million per year.) One solution is to separate perception of risk from risk assessment and deal with the perception of the risk under risk communication and management (i.e. when deciding on adequate and proportionate measures). It could also prove helpful to check the total exposure of the product to the population.

Example: Milk was sold in a milk carton, which was closed with a lid that was small enough to fit into the small parts cylinder (defined in EN 71-1). Even though the risk level was estimated as very low, the producer and the authorities decided to take action by printing a warning on the milk carton.

10.3.5 How to avoid that the number of scenarios explodes?

A major question is what can go wrong. In the RAPEX Guidelines this is implemented by developing an overview of scenarios that can happen with the product. If you make enough assumptions, you may end up with a long list of scenarios that could happen. For example, in a risk analysis of a chain saw you may assume that the user is standing on a stepladder; and also that the person may be wearing unsuitable shoes and standing on a stepladder. Where do you stop?

Every extra step you add in a scenario will lead to another factor in the likelihood that is less than 100%. The most likely scenarios will be those that 1) lead to the injury that you have chosen for the scenario and 2) present the shortest way to the injury. More complicated scenarios may normally be disregarded, unless they lead to new types of injury.

10.3.6 Vulnerable groups

In the first version of the risk assessment method used for justifying RAPEX notifications, (very) vulnerable groups were given much attention. The matrix that was used to decide on the risk level contained specific columns for vulnerable and very vulnerable groups (defined as children, elderly, people with handicaps, etc.). The result of this approach was that even quite low risks could be labelled as unacceptable if the product could come into the hands of young children.

The RAPEX Guidelines [23] do not feature such a special place for vulnerable people, but it is still *possible and desirable* to pay specific attention to them.

How can that be done?

- first, take into account any (very) vulnerable groups when describing scenarios;
- second, analyse if (very) vulnerable people could suffer more serious injuries in those scenarios, or whether the probability of any step in the scenario will be influenced by the vulnerability. Use this information for determining the risk level.

Example: A small part can be broken off a whistle. An injury scenario is that the user breaks off this part while he or she is blowing the whistle and gets into the user's mouth. From here, two developments are possible:

1. *If the user is an adult then he or she would most likely spit out the part and nothing will happen.*
2. *If the user is a small child (i.e. a very vulnerable person), it is more likely that the child will swallow the part. This means that there is a risk that it ends up in the lungs, which in general is considered to be a serious injury.*

In this example the injury scenario worsens dramatically because the probability increases and the injury becomes much more serious. Both affect the risk level.

10.3.7 Subjectivity

If a single expert does an assessment, his or her personal experience may influence the estimation of injury severity and likelihood. The table of injury levels is intended to achieve more consistency and standardisation in this estimation.

To avoid subjectivity:

- use quantitative measures and data;
- work with colleagues from the start or have them review the result.

10.3.8 Non-compliance to a standard means risk?

A shortcoming that is commonly found in RAPEX notifications is that no risk assessment is reported, but just a list of non-compliances to harmonised standards. The market surveillance officer might find the faults so obvious or well-known that it seems superfluous to describe the risk. Risk assessments are probably carried out sometimes to back up the notification or in reaction to it, but this information is not available in the public domain.

As explained in 10.1.3, the pure fact that a product does not comply with a standard is not sufficient to decide on the level of risk. The risk level depends upon the exact requirement and possibly also on how much the measured value deviates from the requirement. A risk assessment is necessary to decide the risk level (which in turn is necessary to decide if a RAPEX notification is at all required). The risk assessment could however be fairly short if the hazard and the injury is well-known. Alternatively existing risk assessments of such well-known hazards could be re-used to quickly decide on measures (this is the basis for so-called failure code lists).

Example: Electrical lamps must meet the requirements of the Low Voltage Directive. The detailed safety requirements are given by standards in the EN 60598 series. One requirement is that the user must not be able to touch live conductors.

If it is possible to touch live conductors in a specific lamp, a sufficient risk assessment would be: “It is likely that a user can touch live wires thus risking a fatal electrical shock.”

10.3.9 Products causing damage to property

The risk assessment method in the RAPEX guidelines works on the assumption that products cause injuries to people. This is however not necessarily the case. If the product is a candle light, then the most likely scenarios have to do with candles putting fire to property.

One approach to handling this is to write injury scenarios that imply that a person is injured (e.g. gets burns, is poisoned by the smoke, dies, etc.). An example of such a scenario could be “Candle puts fire to a curtain, which ignites the room. A person is asleep and does not wake up. The person dies from smoke poisoning.”

The probability of this kind of scenarios can be checked with data from fire statistics. The scenarios include the probability that someone dies in case of a house fire. This probability can be estimated: dividing the number of victims by the number of fires. This estimate takes into account the probability of escaping in time.

Another approach to handling this is to categorise the fire (according to the extent and the resulting damage) in categories that fit with the scale from the RAPEX guidelines, for example:

Severity level	Description of fire
4	A whole building or several rooms are destroyed by the fire.
3	One room is destroyed by the fire or several rooms are affected e.g. by smoke.
2	Few pieces of furniture or curtains are destroyed or one room is affected e.g. by smoke or burn marks.
1	Few pieces of furniture are affected e.g. by smoke or burn marks.

Example of how severity levels can be adapted to incidents that don't involve people. The example concerns fires

Similar categorisations can be developed for damages to other kinds of property or injuries to animals.

10.4 Alternative methods

Several practical tools have been developed for performing risk assessment. A report compiled on behalf of the EU Commission lists six formal methods that were used recently in Europe, but probably more methods exist that had not been formally published (including the use of expert panels). The report further distinguishes between qualitative, semi-quantitative and quantitative methods. For example, a method that makes use of a nomograph is classified as semi-quantitative.

The EMARS Risk Assessment team has tried three methods for various cases to get an idea of the strengths and weaknesses:

- The first version of the risk assessment method used for justifying RAPEX notifications as developed in 2003 for the European Commission as modified and presented in 10.4.1
- The Nomograph method (see 10.4.2).
- The RAPEX procedure [23] (see 10.4.3).

10.4.1 The first version of the risk assessment method used for justifying RAPEX notifications

The first version of the risk assessment method used for justifying RAPEX notifications uses the red-yellow-green matrix that all market surveillance authorities should be familiar with:

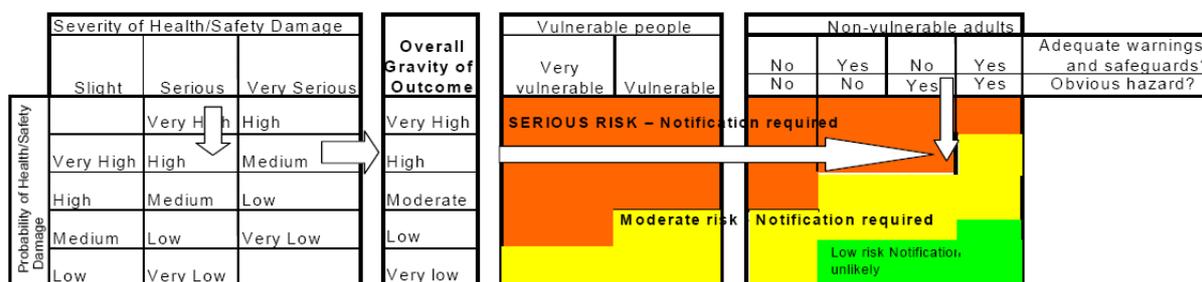


Figure 18 - The matrix from the first version of the risk assessment method used for justifying RAPEX notifications.

A couple of problems have been identified with this method [5]. The primary problem being that the method quite often yields the result "serious risk". This has led to modifications of the method. The method was found to provide less transparency in the background of the results and less diversified (and realistic) results. Finally the homogeneity in different experts' assessments of the same hazard seems to be lower than compared to the RAPEX procedure (chapter 10.4.3 and [23]).

10.4.2 The nomograph method

The Nomograph method uses maximum potential injury (6 levels), probability of hazard occurrence (6 levels) and hazard recognition (5 levels) to make an initial (individual, or single product) risk assessment; this can be combined with the availability of the product (from Rare to Widespread) to arrive at the final (collective, or market) risk assessment. The risk estimation is made using a graph.

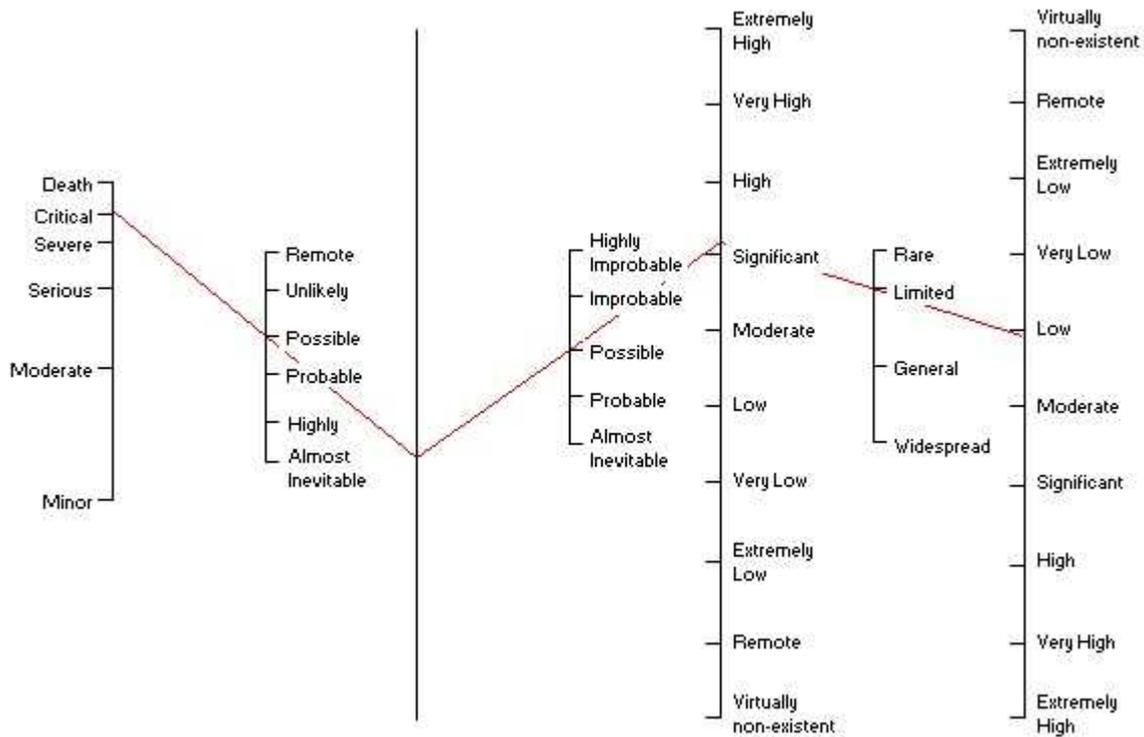


Figure 19 - The nomograph that is used for risk assessment in the nomograph method.

The nomograph method gave a wide range of outcomes in each of the cases and also large variation between experts.

In the RAPEX system, hazard occurrence and hazard recognition can both be included in the injury scenarios. The RAPEX guidelines are found to provide more guidance on selecting the injury level and the probability factors.

10.4.3 The method from the RAPEX guidelines

The method in the RAPEX guidelines is currently the most suitable tool for decisions about unsafe products. Its main features are highlighted above. The method was developed from the one described in chapter 10.4.1 by the Working Group for the Improvement of the Risk Assessment Guidelines WG IRAG (Working Group for the Improvement of the Risk Assessment Guidelines).

The basic instrument in the method is still a matrix but further guidance has been added to facilitate the choice of probabilities and severity of injury. Furthermore, risk for vulnerable consumers is dealt with in a different way: vulnerable consumers have to be taken into account when setting up the injury scenarios.

The method provides guidance on when to issue RAPEX notifications and serves as the preferred method when justifying RAPEX cases.

The method is described in detail in [23].

10.4.4 Why one common method?

Risk assessment can be done in numerous ways but the recommendation is to use the method from the RAPEX guidelines as the standard method for risk assessment in general in Europe.

The advantage of having one harmonised, commonly used method is that it introduces a common language to describe the phenomena associated with risk assessments. This means that problems can be more efficiently discussed and solved among experts in risk assessment. It also increases transparency so that it becomes more obvious why a specific product has been evaluated the way it has and so that differences can be tracked back to obvious reasons (like e.g. differences in the climate in which the product is used).

Furthermore, the method from the RAPEX guidelines is seen to decrease subjectivity as subjective judgements are replaced to the largest possible extent by factors that can be found in tables. As experience with this method grows, more and more exposure factors will be estimated and reported; these factors should be made accessible somehow to further assist in making risk assessments.

The method is harmonised, but it is not mandatory. Other methods can be applied if it can be justified that they give better, more reliable results. This could be the case for specific sectors, where other (and more complex) risk assessment tools exist. An example would be the FMEA method that is used to assess the risks associated with machinery; another example is the modelling and calculation of exposure to chemical substances emitted or migrating from consumer products.

10.5 Examples with model assessments

Six examples of risk assessments have been developed and are included in Annex C.

They cover the following type of products:

- A toy with small parts as an example of a product covered by a harmonised standard;
- Hammers as an example of an assessment that is initialised because of a sample by a Member State;
- A rubber luggage strap as an example of an assessment that is initialised by an accident with a product;
- A cord extension set as an example of an electrical product.
- Socket protectors as an example of an assessment of protective products;
- A candle as an example of a product that is not covered by a standard;
- Bathing mattresses as an example dealing with a chemical hazard;

All examples are presented using the reporting form provided by the web tool available from the Commission's website [24].

Annex B – Different frameworks of risk assessment

It may be confusing that at least two different risk assessment frameworks are used, each with its own definitions. One is common in engineering and accident prevention, in particular the framework adopted by ISO for the safety of machines (ISO 12100) and for product safety in general. Another is used for food and feed safety (adopted by the WHO and FAO), and for chemical safety (WHO IPCS, TGD). As RAPEX notifications may involve both physical hazards and chemical substances, market surveillance authorities may encounter both frameworks. In this annex, we briefly explain the differences between these two frameworks.

Schemes of the risk assessment process

A. ISO 12100, ISO/IEC Guide 51:1999 and ISO/IEC Guide 73:2002

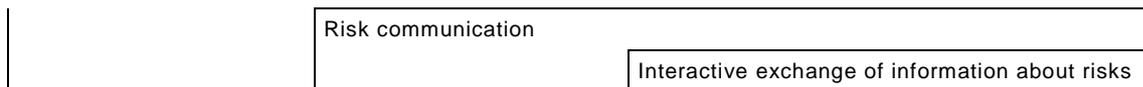
Risk management							
	Risk assessment	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="padding: 5px;">Risk analysis</td> </tr> <tr> <td style="padding: 5px;"> <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="padding: 5px;">Source¹ identification</td> </tr> <tr> <td style="padding: 5px;">Risk estimation</td> </tr> </table> </td> </tr> <tr> <td style="padding: 5px;">Risk evaluation</td> </tr> </table>	Risk analysis	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="padding: 5px;">Source¹ identification</td> </tr> <tr> <td style="padding: 5px;">Risk estimation</td> </tr> </table>	Source ¹ identification	Risk estimation	Risk evaluation
Risk analysis							
<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="padding: 5px;">Source¹ identification</td> </tr> <tr> <td style="padding: 5px;">Risk estimation</td> </tr> </table>	Source ¹ identification	Risk estimation					
Source ¹ identification							
Risk estimation							
Risk evaluation							
	Risk treatment	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="padding: 5px;">Risk avoidance</td> </tr> <tr> <td style="padding: 5px;">Risk optimization</td> </tr> <tr> <td style="padding: 5px;">Risk transfer</td> </tr> <tr> <td style="padding: 5px;">Risk retention</td> </tr> </table>	Risk avoidance	Risk optimization	Risk transfer	Risk retention	
Risk avoidance							
Risk optimization							
Risk transfer							
Risk retention							
	Risk acceptance						
	Risk communication						

¹ in Guide 51, the term 'hazard' is used, defined as a potential source of harm.

The most general term here is “Risk management”, which consists of the elements “Risk assessment”, “Risk treatment”, “Risk acceptance” and “Risk communication”. Within “Risk assessment” in turn two steps are distinguished: “Risk analysis” and “Risk evaluation”; etc.

B. IPCS Risk assessment Terminology, Key Generic Terms used in Chemical Hazard/Risk Assessment; WHO/FAO framework for risk analysis in food; EU Technical Guidance document on Risk Assessment (TGD)

Risk analysis						
	Risk assessment	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="padding: 5px;">Hazard identification</td> </tr> <tr> <td style="padding: 5px;">Hazard characterisation²</td> </tr> <tr> <td style="padding: 5px;">Exposure assessment</td> </tr> <tr> <td style="padding: 5px;">Risk characterisation</td> </tr> </table>	Hazard identification	Hazard characterisation ²	Exposure assessment	Risk characterisation
Hazard identification						
Hazard characterisation ²						
Exposure assessment						
Risk characterisation						
	Risk management ³	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="padding: 5px;">Risk evaluation</td> </tr> <tr> <td style="padding: 5px;">Emission and exposure control</td> </tr> <tr> <td style="padding: 5px;">Risk monitoring</td> </tr> </table>	Risk evaluation	Emission and exposure control	Risk monitoring	
Risk evaluation						
Emission and exposure control						
Risk monitoring						



² includes dose-response assessment; TGD uses 'effects assessment' as an overall term for hazard identification and dose-response assessment

³ WHO/FAO have four components here: preliminary risk management activities; evaluation of risk management options; implementation of risk management decision; monitoring and review.

Here, the general term is "Risk analysis" consisting of the activities "Risk assessment", "Risk management" and "Risk communication"; etc.

Due to the different ways of dividing the process, it is not possible to simply make a correlation table to translate terms. For example, the ISO/IEC term *risk estimation* is more or less a combination of *hazard characterisation* and *exposure assessment*. *Risk evaluation* in the ISO/IEC framework can be compared with *risk characterisation* combined with *risk evaluation* in the IPCS terminology.

The following definitions are used in the IPCS document:

Risk

The probability of an adverse effect in an organism caused under specified circumstances by exposure to an agent.

Agent

Chemical substance, which may cause adverse effects such as injury or damage to health.

NOTE: in this definition, we extend the meaning of 'agent' from chemical substance to include physical hazards]

Risk assessment

A process intended to calculate or estimate the risk to a given target organism, including the identification of attendant uncertainties, following exposure to a particular agent, taking into account the inherent characteristics of the agent of concern as well as the characteristics of the specific target organism.

The risk assessment process includes four steps: hazard identification, hazard characterization, exposure assessment, and risk characterization.

Hazard identification

The identification of the type and nature of adverse effects that an agent has an inherent capacity to cause in an organism, system, or (sub) population.

NOTE: the result of this step should be a number of scenarios that may occur including the health outcomes (endpoints).

Hazard characterisation

The qualitative and, wherever possible, quantitative description of the inherent property of an agent or situation having the potential to cause adverse effects. This should, where possible, include a dose–response assessment and its attendant uncertainties.

NOTE: the result of this step should be a justified conclusion about the severity of the adverse effects. The tool used for this in the RAPEX Guidelines is the injury table.

Exposure assessment

Evaluation of the exposure of an organism, system, or (sub)population to an agent.

NOTE: General relevant parameters are frequency of contact with the product, exposure pathways, behaviour of person and vulnerability of person.

For chemical substances, exposure is usually expressed as mg substance per kg body weight that is taken up by inhalation, dermal contact or ingestion; specific parameters include e.g. evaporation or diffusion.

For physical hazards, relevant parameters can be the probability that a scenario will occur, energy transferred to a body part, etc.

Risk characterisation

The qualitative and, wherever possible, quantitative determination, including attendant uncertainties, of the probability of occurrence of known and potential adverse effects of an agent in a given organism, system, or (sub)population, under defined exposure conditions.

NOTE: the result of this phase is a conclusion on the expected risk level in terms of severity and probability. It may include a quantitative probability distribution of adverse effects, and confidence intervals or sensitivity analysis.

Annex C Examples of risk assessment

C.1 Toy with small partsP

C.1.1 Identification of product and case, description of the context

This case deals with a push-along toy that was notified by Belgium in 2008 (RAPEX notification 0265/08).



Figure C.5 A toy with detachable small parts.

C.1.2 Description of the hazards

According to the RAPEX notification the toy poses a serious risk of choking because the duck's beak can be detached at a force of 19 N. (The requirement from EN 71-1 is 100 N.) The detached part fits into the small parts cylinder.

C.1.3 Description of injury scenarios and sensitivity

The risk assessment is reported on the following pages using the report from the Commissions web tool "Risk Assessment Guidelines" [24].

The outcome of the analyses is a scenario resulting in "high risk". The assumptions behind this calculation are:

- The beak is so poorly attached that it will sooner or later over the lifetime of the product become detached. This is expected to happen for all products in this batch;
- The child will be alone while playing with the toy in 50 % of the cases when the beak detaches;
- It is considered to be normal behaviour for small children to examine objects by putting them in the mouth;
- It is assumed that the beak is so small that it does not get stuck in the larynx; only if it is aspirated it will cause (partial) blocking of the airways.

The resulting probability 1/2.000 falls in the category "> 1/10.000" but it is close to the category "> 1.000". A sensitivity analysis revealed that using this category instead will change the outcome to "serious risk". Moreover, the severity could increase as well: depending on the shape, size and material of the beak, the part might cause complete blocking of the airways leading to permanent damage or death. Taking the uncertainties into account the result of the risk assessment is changed to "serious risk".

C.1.4 Conclusion

The overall outcome of the analysis is that the risk is serious, i.e. rapid action against the product should be taken.

RAPEX Risk Assessment

General Information

Product

Name: Push toy (duck) with small part

Category: Toys

Description: This case deals with a push-along toy that was notified by Belgium in 2008 (RAPEX notification 0265/08). According to the RAPEX notification the toy poses a serious risk of choking because the duck's beak can be detached at a force of 19 N. (The requirement from EN 71-1 is 100 N.) The detached part fits into the small parts cylinder.

Risk assessor

First Name: Torben

Last Name: Rahbek

Organisation: PROSAFE

Address:

Product risks - Overview

Scenario 1 : **High risk** - The child detaches the beak. The parents don't notice or don't react. The child puts the beak in its mouth. The small part goes into the child's airways and surgery is necessary.

Overall Risk : **High risk**

Scenario 1 : Very young children - Product is or contains small part

Product hazard

Hazard Group: Size, shape and surface
 Hazard Type: Product is or contains small part

Consumer

Consumer Type: Very young children - 0 to 36 months (Very vulnerable consumers)

How the hazard causes an injury to the consumer

Injury scenario: The child detaches the beak. The parents don't notice or don't react. The child puts the beak in its mouth. The small part goes into the child's airways and surgery is necessary.

Severity of Injury

Injury: Internal airway obstruction
 Level: 3 Oxygen flow to brain blocked without permanent consequences

Probability of the steps to injury

Step(s) to Injury	Probability
Step 1: The beak is detached	100 %
Step 2: The parents don't notice	> 50 %
Step 3: The child puts the beak in the mouth	100 %
Step 4: The beak gets in the child's airways	> 1/1,000

Calculated probability: 0.0005

Overall probability: > 1/10,000

Risk of this scenario: High risk

C.2 Hammer

C.2.1 Identification of product and case, description of the context

This case deals with a cross pane hammer with metal handle and black plastic grip where the hammer head can fly off. The hammer head is insufficiently fastened on the handle and the plastic grip breaks under normal strain.

The case is taken from the RAPEX notification number: 0125/06.

C.2.2 Description of the hazards

The hammer has three dangerous shortcomings:

- The hammer head is insufficiently fastened on the handle.
- The plastic grip breaks under normal strain.
- The hammer head is made of brittle material with insufficient dynamic impact strength.

All hazards may result in parts that break off the hammer hits the user or on a spectator standing nearby.

C.2.3 Description of injury scenarios and sensitivity

The risk assessment is reported on the following pages using the report from the Commissions web tool "Risk Assessment Guidelines" [24].

A sensitivity analysis has not been carried out. However, the probability of the first injury scenario (which has the highest risk level) can be a factor of 6 higher before the risk changes to "serious risk". None of the scenarios will reach the "serious risk" level with reasonable assumptions for the probability.

C.2.4 Conclusion

The risk assessment is reported on the following pages using the report from the Commissions web tool "Risk Assessment Guidelines" [24].

The result of this analysis is that two scenarios have the outcome "high risk" (which happens to be the most serious outcome). Four scenarios result in "low risk" and the last one ends in "significant risk".

The overall outcome of the analysis is that the risk is high, i.e. action against the product should be taken, but there is no need for a rapid intervention and RAPEX-notifications.

RAPEX Risk Assessment

General Information

Product

Name: Hammer case

Category: Tools

Description: This case deals with a cross pane hammer with metal handle and black plastic grip where the hammer head can fly of. The hammer head is insufficiently fastened on the handle and the plastic grip breaks under normal strain. The case is taken from the RAPEX notification number: 0125/06. The hammer has three dangerous shortcomings: - The hammer head is insufficiently fastened on the handle. - The plastic grip breaks under normal strain. - The hammer head is made of brittle material with insufficient dynamic impact strength. All hazards may result in parts that break of the hammer hits the user or on a spectator standing nearby.

Risk assessor

First Name: Torben

Last Name: Rahbek

Organisation: PROSAFE

Address:

Product risks - Overview

Scenario 1 : **High risk** - Parts of head fly off when person uses hammer and hits hard surface. Part flies into eye.

Scenario 2 : **High risk** - Parts of head fly off when person uses hammer and hits hard surface. Large part hits head.

Scenario 3 : **Low risk** - Parts of head fly off when person uses hammer and hits hard surface. Large part hits hand, foot or other body part.

Scenario 4 : **Low risk** - Handle grip of hammer slides off shaft. Hammer flies off when person swings hammer and hits head of other person (child/person must be nearby).

Scenario 5 : **Low risk** - Handle grip of hammer slides off shaft. Hammer flies off when person swings hammer and hits head of other person (child/person must be nearby)

Scenario 6 : **Low risk** - Handle grip of hammer slides off shaft. Hammer flies off when person swings hammer and hits body part of user or other person

Scenario 7 : **Medium risk** - Tha handle grip breaks because shaft is too short. Top part of hammer bounces back and hits user's arm.

Overall Risk : High risk

Scenario 1 : Other consumers - Flying objects

Product hazard

Hazard Group: Kinetic energy
Hazard Type: Flying objects

Consumer

Consumer Type: Other consumers - Consumers other than vulnerable or very vulnerable consumers

How the hazard causes an injury to the consumer

Injury scenario: Parts of head fly off when person uses hammer and hits hard surface. Part flies into eye.

Severity of Injury

Injury: Eye injury, foreign body in eye
Level: 3 Partial loss of sight
Permanent loss of sight (one eye)

Probability of the steps to injury

Step(s) to Injury	Probability
Step 1: Hammer head breaks	> 1/10
Step 2: The broken parts fly off and hits the user	> 1/10
Step 3: The flying parts hit the head of the user	> 1/3
Step 4: the flying parts hit the eye	> 1/20

Calculated probability: 0.00017

Overall probability: > 1/10,000

Risk of this scenario: High risk

Scenario 2 : Other consumers - Flying objects

Product hazard

Hazard Group: Kinetic energy
Hazard Type: Flying objects

Consumer

Consumer Type: Other consumers - Consumers other than vulnerable or very vulnerable consumers

How the hazard causes an injury to the consumer

Injury scenario: Parts of head fly off when person uses hammer and hits hard surface.
Large part hits head.

Severity of Injury

Injury: Fracture
Level: 2 Extremities (finger, toe, hand, foot)
 Wrist
 Arm
 Rib
 Sternum
 Nose
 Tooth
 Jaw
 Bones around eye

Probability of the steps to injury

Step(s) to Injury	Probability
Step 1: Hammer head breaks	> 1/10
Step 2: The broken parts fly off and hits the user	> 1/10
Step 3: The flying parts hit the head of the user	> 1/3

Calculated probability: 0.0033

Overall probability: > 1/1,000

Risk of this scenario: High risk

Scenario 3 : Other consumers - Flying objects

Product hazard

Hazard Group: Kinetic energy
Hazard Type: Flying objects

Consumer

Consumer Type: Other consumers - Consumers other than vulnerable or very vulnerable consumers

How the hazard causes an injury to the consumer

Injury scenario: Parts of head fly off when person uses hammer and hits hard surface.
Large part hits hand, foot or other body part.

Severity of Injury

Injury: Bruising (abrasion/ contusion, swelling, oedema)
Level: 1 Superficial
=25 cm² on face
=50 cm² on body

Probability of the steps to injury

Step(s) to Injury	Probability
Step 1: Hammer head breaks	> 1/10
Step 2: The broken parts fly off and hits the user	> 1/10
Step 3: The flying parts hit body parts of the user	> 70 %

Calculated probability: 0.007

Overall probability: $\geq 1/1,000$

Risk of this scenario: Low risk

Scenario 4 : Other consumers - Flying objects

Product hazard

Hazard Group: Kinetic energy
Hazard Type: Flying objects

Consumer

Consumer Type: Other consumers - Consumers other than vulnerable or very vulnerable consumers

How the hazard causes an injury to the consumer

Injury scenario: Handle grip of hammer slides off shaft. Hammer flies off when person swings hammer and hits head of other person (child/person must be nearby).

Severity of Injury

Injury: Concussion
Level: 2 Very short unconsciousness (minutes)

Probability of the steps to injury

Step(s) to Injury	Probability
Step 1: The grip slides off	> 1/5
Step 2: A person is nearby	> 1/10
Step 3: The flying part hits the spectator	> 1/100
Step 4: The part hits the spectator's head	> 1/10

Calculated probability: 0.00002

Overall probability: > 1/100,000

Risk of this scenario: Low risk

Scenario 5 : Other consumers - Flying objects

Product hazard

Hazard Group: Kinetic energy
Hazard Type: Flying objects

Consumer

Consumer Type: Other consumers - Consumers other than vulnerable or very vulnerable consumers

How the hazard causes an injury to the consumer

Injury scenario: Handle grip of hammer slides off shaft. Hammer flies off when person swings hammer and hits head of other person (child/person must be nearby)

Severity of Injury

Injury: Fracture
Level: 2 Extremities (finger, toe, hand, foot)
Wrist
Arm
Rib
Sternum
Nose
Tooth
Jaw
Bones around eye

Probability of the steps to injury

Step(s) to Injury	Probability
Step 1: The grip slides off	> 1/5
Step 2: A person is nearby	> 1/10
Step 3: The flying part hits the person	> 1/100
Step 4: The flying part hits the spectator's head	> 1/10

Calculated probability: 0.00002

Overall probability: > 1/100,000

Risk of this scenario: Low risk

Scenario 6 : Other consumers - Flying objects

Product hazard

Hazard Group: Kinetic energy
Hazard Type: Flying objects

Consumer

Consumer Type: Other consumers - Consumers other than vulnerable or very vulnerable consumers

How the hazard causes an injury to the consumer

Injury scenario: Handle grip of hammer slides off shaft. Hammer flies off when person swings hammer and hits body part of user or other person

Severity of Injury

Injury: Bruising (abrasion/ contusion, swelling, oedema)
Level: 1 Superficial
=25 cm² on face
=50 cm² on body

Probability of the steps to injury

Step(s) to Injury	Probability
Step 1: The grip slides off	> 1/5
Step 2: A person is nearby	> 1/10
Step 3: The flying part hits the person	> 1/100

Calculated probability: 0.0002

Overall probability: > 1/10,000

Risk of this scenario: Low risk

Scenario 7 : Other consumers - Moving product

Product hazard

Hazard Group: Kinetic energy
Hazard Type: Moving product

Consumer

Consumer Type: Other consumers - Consumers other than vulnerable or very vulnerable consumers

How the hazard causes an injury to the consumer

Injury scenario: The handle grip breaks because shaft is too short. Top part of hammer bounces back and hits user's arm.

Severity of Injury

Injury: Bruising (abrasion/ contusion, swelling, oedema)
Level: 1 Superficial
=25 cm² on face
=50 cm² on body

Probability of the steps to injury

Step(s) to Injury	Probability
Step 1: The handle breaks	> 50 %
Step 2: The top part of the hammer hits the arm	> 1/5

Calculated probability: 0.1

Overall probability: > 1/10

Risk of this scenario: Medium risk

C.3 Rubber luggage strap

C.3.1 Identification of product and case, description of the context.

This case deals with a rubber luggage strap with metal hooks in both ends. The strap is used for affixing luggage to bicycles, motorcycles or to the roof of a car.



Figure C2: Rubber strap used for affixing luggage to motorcycles or cars

The case is provided by VWA in the Netherlands. In the Netherlands some 30 accidents are reported each year. Half of them result in eye injuries of which 50 % result in permanent impairment. There are even a few cases of lost eyes and blindness on one eye.

C.3.2 Description of the hazards

The risk with this product comes from the hooks in the ends of the strap being of so poor quality that they bend open if the tension in the strap is too high. The result is that the hook hits the user quite hard. The most severe injury is supposed to occur if the hook in the opposite end of the strap opens.

Further to this, a number of accidents happen because the user attaches the hooks poorly, so that they loose their grip when the strap is tightened. These scenarios are not analysed here.

C.3.3 Description of injury scenarios and sensitivity

The risk assessment is reported on the following pages using the report from the Commissions web tool "Risk Assessment Guidelines" [24]. The scenario has been developed based on a case found in an article in a medical journal.

The estimate of the probability that a hook at the end of a strap will open carries the highest uncertainty in the calculation. If the resulting probability increases to 1/10,000 (a factor of 6) then the risk level increases to "high risk".

C.3.4 Conclusion

The result of the analysis is that the risk level is "medium risk".

A special problem arises because the probability of an accident might be low but the number of products is high. In the actual case, a low probability is "multiplied" by a serious consequence and the result is a medium risk. Still the fact is that the big number of products implies that there are quite a few injuries every year. These should be taken into account when deciding on the appropriate risk management measures.

RAPEX Risk Assessment

General Information

Product

Name: Rubber luggage straps

Category:

Description: This case deals with a rubber luggage strap with metal hooks in both ends. The strap is used for affixing luggage to bicycles, motorcycles or to the roof of a car. The case is provided by VWA in the Netherlands. In the Netherlands some 30 accidents are reported each year. Half of them result in eye injuries of which 50 % result in permanent impairment. There are even a few cases of lost eyes and blindness on one eye. The risk with this product comes from the hooks in the ends of the strap being of so poor quality that they bend open if the tension in the strap is too high. The result is that the hook hits the user quite hard. The most severe injury is supposed to occur if the hook in the opposite end of the strap opens. (Further to this scenario a number of accidents happen because the user attaches the hooks poorly, so that they loose their grip when the strap is tightened. These scenarios are not analysed here.)

Risk assessor

First Name: Torben

Last Name: Rahbek

Organisation: PROSAFE

Address:

Product risks - Overview

Scenario 1 : **Medium risk** - Person tries to fix luggage while standing in the line of the strap; hook on other end opens and hits person in the eye.

Overall Risk : **Medium risk**

Scenario 1 : Other consumers - Moving product

Product hazard

Hazard Group: Kinetic energy
Hazard Type: Moving product

Consumer

Consumer Type: Other consumers - Consumers other than vulnerable or very vulnerable consumers

How the hazard causes an injury to the consumer

Injury scenario: Person tries to fix luggage while standing in the line of the strap; hook on other end opens and hits person in the eye.

Severity of Injury

Injury: Eye injury, foreign body in eye
Level: 3 Partial loss of sight
Permanent loss of sight (one eye)

Probability of the steps to injury

Step(s) to Injury	Probability
Step 1: The person stands in line with the suspended strap.	> 50 %
Step 2: The hook opens	> 1/100
Step 3: The hook hits the head	> 1/3
Step 4: The hook hits the eye	> 1/20
Step 5: The hook causes an eye injury	> 1/5

Calculated probability: 0.000017

Overall probability: > 1/100,000

Risk of this scenario: Medium risk

C.4 Cord extension set with 3-way socket outlet

C.4.1 Identification of product and case, description of the context

Cord extension set with 3-way socket outlet and switch. Mains cable 2,90 m with moulded earthed plug. The product was rejected by the German custom authorities. The product was notified by Germany in 2010, RAPEX notification 1520/10.

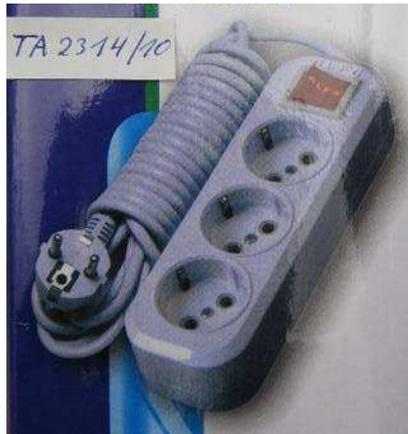


Figure C.6 Cord extension set with 3-way socket outlet.

C.4.2 Description of the hazards

The product poses a risk of electric shock because the contact surfaces are too weak and already deformed so there is no contact between the earth connector in the socket and the earth connector on the plug. If a defective electrical appliance is connected via the cord extension set, it will not be connected to protective earth. This means that a user will get an electrical shock when he touches the housing of the appliance.

Furthermore the cross-section of the conductors in the supply cord is too small and the live conductors are soldered to the contact surfaces, If an appliance with high power consumption is connected via the extension set and used for a longer time, the cords will overheat and may catch fire which may ignite surrounding objects.

C.4.3 Description of injury scenarios and sensitivity

The risk assessment is reported on the following pages using the report from the Commissions web tool "Risk Assessment Guidelines" [24].

Two scenarios have been considered. Both create a serious risk. A sensitivity analysis shows that this serious risk level remains valid, even if the probability would be a factor 10 lower.

The main uncertainty in this case is linked to the probability that a electric shock is fatal.

C.4.4 Conclusion

The overall outcome of the analysis is that the risk is serious.

RAPEX Risk Assessment

General Information

Product

Name: Cord extension set with 3 sockets and main switch

Category:

Description:

Risk assessor

First Name: Torben

Last Name: Rahbek

Organisation: PROSAFE

Address:

Product risks - Overview

Scenario 1 : **Serious risk** - The user connects a defect electrical appliance to the non-earthed cord extension set and gets an electric shock

Scenario 2 : **Serious risk** - An electrical appliance with high power consumption is connected to the cord extension set. It overheats the cord extension set that catches fire. The user gets injuries because of smoke and fire.

Overall Risk : **Serious risk**

Scenario 1 : Other consumers - High/low voltage

Product hazard

Hazard Group: Electrical energy
Hazard Type: High/low voltage

Consumer

Consumer Type: Other consumers - Consumers other than vulnerable or very vulnerable consumers

How the hazard causes an injury to the consumer

Injury scenario: The user connects a defect electrical appliance to the non-earthed cord extension set and gets an electric shock

Severity of Injury

Injury: Electric shock
Level: 4 Electrocutation

Probability of the steps to injury

Step(s) to Injury	Probability
Step 1: Use of a defective electrical appliance	> 1/20
Step 2: Appliance is not earthed	> 1/10
Step 3: Appliance has (touchable) live parts and is in use	100 %
Step 4: User gets an electric shock	100 %
Step 5: Electric shock is fatal	> 1/5

Calculated probability: 0.001

Overall probability: > 1/1,000

Risk of this scenario: Serious risk

Scenario 2 : Other consumers - Heat production

Product hazard

Hazard Group: Electrical energy
Hazard Type: Heat production

Consumer

Consumer Type: Other consumers - Consumers other than vulnerable or very vulnerable consumers

How the hazard causes an injury to the consumer

Injury scenario: An electrical appliance with high power consumption is connected to the cord extension set. It overheats the cord extension set that catches fire. The user gets injuries because of smoke and fire.

Severity of Injury

Injury: Burn/ Scald (by heat, cold, or chemical substance)
Level: 4 2° or 3°, >35% of body surface
Inhalation burn requiring respiratory assistance

Probability of the steps to injury

Step(s) to Injury	Probability
Step 1: Appliance with high power consumption is connected	> 1/20
Step 2: Appliance is used for a longer time	> 70 %
Step 3: Cord gets overheated	100 %
Step 4: Cord catches fire and ignites surrounding objects	> 70 %
Step 5: User gets injuries by smoke and fire	> 1/20

Calculated probability: 0.0012

Overall probability: > 1/1,000

Risk of this scenario: Serious risk

C.5 Socket protectors

C.5.1 Identification of product and case, description of the context

This case deals with socket protectors - devices that users (parents) put on the electrical socket outlets to avoid that small children access live parts by putting long metal object into one of the holes in the outlet and gets a (possibly fatal) electric shock.



Figure C.3 Socket protector that prevents children from putting pointy things into socket outlets.

C.5.2 Description of the hazards

The holes in this protector (where the pins of the plug go through) are so narrow that the pins might get stuck. This would most likely mean that the user will pull the protector off the outlet when the plug is pulled out.

If the user doesn't notice (or doesn't put back the protector) then the outlet is left unprotected for the children. Therefore the product will not provide the protection that the parents rely on.

C.5.3 Description of injury scenarios and sensitivity

The risk assessment is reported on the following pages using the report from the Commissions web tool "Risk Assessment Guidelines" [24].

The outcomes of the analyses were one scenario resulting in "serious risk" and one in "low". The calculations are based on an estimated probability that the protector can be removed unintended over the lifetime of the product of 90 %. A sensitivity analysis revealed that only if this probability is less than 0.1 % the outcome would change to "high risk".

Some homes have residual current breakers that will interrupt the power if a person touches the live wire. This is included in the analyses as an extra factor in the calculation of the probability in the three scenarios. It does not affect the outcome.

For comparison, we have made an analysis for an unprotected socket outlet. The risk assessment report is annexed immediately after the report from the protected outlet.

C.5.4 Conclusion

The product in itself is not dangerous. The risk arises because the product tempts the users to change their habits because they rely on the protective properties of the product.

The overall outcome of the analysis is that the risk is serious, i.e. rapid action against the product should be taken.

RAPEX Risk Assessment

General Information

Product

Name: Socket protectors

Category: Protective equipment

Description: This case deals with socket protectors - devices that users (parents) put on the electrical socket outlets to avoid that small children access live parts by putting long metal object into one of the holes in the outlet and gets a (possibly fatal) electric shock. The holes in this protector (where the pins of the plug go through) are so narrow that the pins might get stuck. This would most likely mean that the user will pull the protector off the outlet when the plug is pulled out.

Risk assessor

First Name: Torben

Last Name: Rahbek

Organisation: PROSAFE

Address:

Product risks - Overview

Scenario 1 : **Serious risk** - Protector is removed from the plug, which becomes unprotected.

Child is playing with thin conductible object which can be inserted into the socket, access high voltage and is electrocuted.

Scenario 2 : **Low risk** - Protector is removed from the plug, which becomes unprotected. Child is playing with thin conductible object which can be inserted into the socket, access high voltage and sustains shock.

Overall Risk : **Serious risk**

Scenario 1 : Young children - High/low voltage

Product hazard

Hazard Group: Electrical energy
Hazard Type: High/low voltage

Consumer

Consumer Type: Young children - Older than 36 months and younger than 8 years
(Vulnerable consumers)

How the hazard causes an injury to the consumer

Injury scenario: Protector is removed from the plug, which becomes unprotected. Child is playing with thin conductible object which can be inserted into the socket, access high voltage and is electrocuted.

Severity of Injury

Injury: Electric shock
Level: 4 Electrocution

Probability of the steps to injury

Step(s) to Injury	Probability
Step 1: The protector is removed from the socket	> 90 %
Step 2: The parent doesn't notice the removal of the protector	> 1/10
Step 3: The child is playing with a thin conductible object	> 1/10
Step 4: The child is unattended when playing	> 50 %
Step 5: The child inserts the object into the socket	> 1/3
Step 6: The object touches the phase wire	> 50 %
Step 7: The child is electrocuted due to voltage. (There is no residual current circuit interrupter in this scenario.)	> 1/5

Calculated probability: 0.00015

Overall probability: > 1/10,000

Risk of this scenario: Serious risk

Scenario 2 : Young children - High/low voltage

Product hazard

Hazard Group: Electrical energy
Hazard Type: High/low voltage

Consumer

Consumer Type: Young children - Older than 36 months and younger than 8 years
(Vulnerable consumers)

How the hazard causes an injury to the consumer

Injury scenario: Protector is removed from the plug, which becomes unprotected. Child is playing with thin conductible object which can be inserted into the socket, access high voltage and sustains shock.

Severity of Injury

Injury: Burn/ Scald (by heat, cold, or chemical substance)
Level: 1 1°, up to 100% of body surface
2°, <6% of body surface

Probability of the steps to injury

Step(s) to Injury	Probability
Step 1: The protector is removed from the socket	> 90 %
Step 2: The parent doesn't notice the removal of the protector	> 1/10
Step 3: The child is playing with a thin conductible object	> 1/10
Step 4: The child is unattended when playing	> 50 %
Step 5: The child inserts the object into the socket	> 1/3
Step 6: The object touches the phase wire	> 50 %
Step 7: The child is burned due to voltage. (There is no residual current circuit interrupter in this scenario.)	> 70 %

Calculated probability: 0.00053

Overall probability: > 1/10,000

Risk of this scenario: Low risk

RAPEX Risk Assessment

General Information

Product

Name: Socket protectors - REFERENCE SCENARIO

Category: Protective equipment

Description: THIS IS THE REFERENCE SCENARIO: For comparison, an analysis has been carried out for an unprotected socket outlet. In this case, the parent does not expect protection and therefore it seems less likely that the child will be left unattended near the outlet.

Risk assessor

First Name: Torben

Last Name: Rahbek

Organisation: PROSAFE

Address:

Product risks - Overview

Scenario 1 : **High risk** - Socket unprotected. Child is playing with thin conductible object which can be inserted into the socket, access high voltage and is electrocuted.

Overall Risk : **High risk**

Scenario 1 : Young children - High/low voltage

Product hazard

Hazard Group: Electrical energy
Hazard Type: High/low voltage

Consumer

Consumer Type: Young children - Older than 36 months and younger than 8 years
(Vulnerable consumers)

How the hazard causes an injury to the consumer

Injury scenario: Socket unprotected. Child is playing with thin conductible object which can be inserted into the socket, access high voltage and is electrocuted.

Severity of Injury

Injury: Electric shock
Level: 4 Electrocutation

Probability of the steps to injury

Step 1: The child is playing with a thin conductible object	> 1/10
Step 2: The child is unattended when playing	> 1/100
Step 3: The child inserts the object into the socket	> 1/3
Step 4: The object touches the phase wire	> 50 %
Step 5: The child is electrocuted due to voltage. (There is no residual current circuit interrupter in this scenario.)	> 1/5

Calculated probability: 0.000033

Overall probability: > 1/100,000

Risk of this scenario: High risk

C.6 Candle

C.6.1 Identification of product and case, description of the context

Candles containing plant parts, e.g. sunflower seeds or coffee beans, have been reported to burn intensely with high flames. There have been at least two RAPEX recalls for candles in 2006: 0351/06 and 0563/06.



Figure C.6 Candles containing plant parts may burn intensely with high flames and cause fires.

C.6.2 Description of the hazards

When the candle burns down and the wax melts, the plant parts begin to float in the melted wax. At this stage the plant parts will heat up or get stuck to the wick, which may cause the parts to catch fire. This fire will usually evolve rapidly, melt the rest of the candle and might put fire to the furniture where the candle is placed. If nobody is present at this stage this will most likely develop into a fire that can cause harm to people.

Another hazard is due to the fact that the plant parts may be easily detachable and fit into the small parts cylinder. This will make them dangerous if small children swallow them.

C.6.3 Description of injury scenarios and sensitivity

The risk assessment is reported on the following pages using the report from the Commissions web tool "Risk Assessment Guidelines" [24].

Several scenarios for these candles create a serious risk. A sensitivity analysis shows that this serious risk level remains valid, even if the probability would be a factor 10 lower.

The uncertainty in this case is rather high because several steps in the scenarios depend on behaviour rather than physical parameters.

It is noted that fires often result in considerable damage to property, even when there are no people injured. This risk cannot be estimated according to the standard RAPEX table. Instead, we have assumed for this assessment that a certain percentage of house fires leads to fatalities.

C.6.4 Conclusion

The overall outcome of the analysis is that the risk is serious.

RAPEX Risk Assessment

General Information

Product

Name: Candle containing small flammable parts

Category: Candle

Description: Candles containing plant parts, e.g. sunflower seeds or coffee beans, have been reported to burn intensely with high flames. There have been at least two RAPEX recalls for candles in 2006: 0351/06 and 0563/06. When the candle burns down and the wax melts, the plant parts begin to float in the melted wax. At this stage the plant parts will heat up or get stuck to the wick, which may cause the parts to catch fire. This fire will usually evolve rapidly, melt the rest of the candle and might put fire to the furniture where the candle is placed. If nobody is present at this stage this will most likely develop into a fire that can cause harm to people. Another hazard is due to the fact that the plant parts may be easily detachable and fit into the small parts cylinder. This will make them dangerous if small children swallow them.

Risk assessor

First Name: Torben

Last Name: Rahbek

Organisation: PROSAFE

Address:

Product risks - Overview

Scenario 1 : **Medium risk** - Seeds or beans catch fire and generates high flames. The person blows out the flames and tries to move the candle. Hot wax flows over then hands of the person.

Scenario 2 : **Medium risk** - Seeds or beans catch fire and generates high flames. The person tries to extinguish the flames by pouring liquid. The flames reaches the hands of the person.

Scenario 3 : **Serious risk** - Seeds or beans catches fire generating high flames. Furniture or curtains catch fire. The person is not in the room, but inhales toxic fumes.

Scenario 4 : **Serious risk** - Seeds or beans catches fire generating high flames. Furniture or curtains catch fire. The person is in the room and inhales toxic fumes.

Scenario 5 : **Low risk** - Seeds or beans catches fire generating high flames. The person sits close to the candle. The flames ignite hair or clothing of the person.

Scenario 6 : **Serious risk** - Seeds or beans are attractive to children. Children pick them out of the candle, put them in the mouth and it enters the trachea. The child is suffocated.

Overall Risk : **Serious risk**

Scenario 1 : Other consumers - Hot liquids

Product hazard

Hazard Group: Extreme temperatures
 Hazard Type: Hot liquids

Consumer

Consumer Type: Other consumers - Consumers other than vulnerable or very vulnerable consumers

How the hazard causes an injury to the consumer

Injury scenario: Seeds or beans catch fire and generates high flames. The person blows out the flames and tries to move the candle. Hot wax flows over then hands of the person.

Severity of Injury

Injury: Burn/ Scald (by heat, cold, or chemical substance)
 Level: 1 1°, up to 100% of body surface
 2°, <6% of body surface

Probability of the steps to injury

Step(s) to Injury	Probability
Step 1: Seeds or beans catch fire	> 90 %
Step 2: The person tries to move the candle	> 1/5
Step 3: Hot wax flows over then hands of hte person	> 70 %

Calculated probability: 0.13

Overall probability: > 1/10

Risk of this scenario: Medium risk

Scenario 2 : Other consumers - Open flames

Product hazard

Hazard Group: Extreme temperatures
Hazard Type: Open flames

Consumer

Consumer Type: Other consumers - Consumers other than vulnerable or very vulnerable consumers

How the hazard causes an injury to the consumer

Injury scenario: Seeds or beans catch fire and generates high flames. The person tries to extinguish the flames by pouring liquid. The flames reaches the hands of the person.

Severity of Injury

Injury: Burn/ Scald (by heat, cold, or chemical substance)
Level: 1 1°, up to 100% of body surface
2°, <6% of body surface

Probability of the steps to injury

Step(s) to Injury	Probability
Step 1: Seeds or beans catch fire	> 90 %
Step 2: The person tries to extinguish the flames	> 90 %
Step 3: The flames reaches the hands of the person.	> 50 %

Calculated probability: 0.41

Overall probability: > 1/10

Risk of this scenario: Medium risk

Scenario 3 : Other consumers - Toxic gas

Product hazard

Hazard Group: Toxicity
Hazard Type: Toxic gas

Consumer

Consumer Type: Other consumers - Consumers other than vulnerable or very vulnerable consumers

How the hazard causes an injury to the consumer

Injury scenario: Seeds or beans catches fire generating high flames. Furniture or curtains catch fire. The person is not in the room, but inhales toxic fumes.

Severity of Injury

Injury: Poisoning from substances (ingestion, inhalation, dermal)
Level: 4 Irreversible damage to nerve system
Fatality

Probability of the steps to injury

Step(s) to Injury	Probability
Step 1: Seeds or beans catches fire generating high flames	> 90 %
Step 2: Nobody in the room for some time.	> 1/3
Step 3: Furniture or curtains catch fire	> 50 %
Step 4: The person inhales toxic fumes.	> 1/20

Calculated probability: 0.0075

Overall probability: > 1/1,000

Risk of this scenario: Serious risk

Scenario 4 : Other consumers - Toxic gas

Product hazard

Hazard Group: Toxicity
Hazard Type: Toxic gas

Consumer

Consumer Type: Other consumers - Consumers other than vulnerable or very vulnerable consumers

How the hazard causes an injury to the consumer

Injury scenario: Seeds or beans catches fire generating high flames. Furniture or curtains catch fire. The person is in the room and inhales toxic fumes.

Severity of Injury

Injury: Poisoning from substances (ingestion, inhalation, dermal)
Level: 4 Irreversible damage to nerve system
Fatality

Probability of the steps to injury

Step(s) to Injury	Probability
Step 1: Seeds or beans catches fire generating high flames	> 90 %
Step 2: Furniture or curtains catch fire	> 50 %
Step 3: The person is in the room (e.g. sleeping)	> 1/100
Step 4: The person inhales toxic fumes.	100 %

Calculated probability: 0.0045

Overall probability: > 1/1,000

Risk of this scenario: Serious risk

Scenario 5 : Other consumers - Open flames

Product hazard

Hazard Group: Extreme temperatures
Hazard Type: Open flames

Consumer

Consumer Type: Other consumers - Consumers other than vulnerable or very vulnerable consumers

How the hazard causes an injury to the consumer

Injury scenario: Seeds or beans catches fire generating high flames. The person sits close to the candle. The flames ignite hair or clothing of the person.

Severity of Injury

Injury: Burn/ Scald (by heat, cold, or chemical substance)
Level: 3 2°, 16-35% of body surface, or 3°, up to 35% of body surface
Inhalation burn

Probability of the steps to injury

Step(s) to Injury	Probability
Step 1: Seeds or beans catches fire generating high flames	> 90 %
Step 2: The person sits close to the candle	> 1/1,000
Step 3: The flames ignite hair or clothing of the person.	> 1/1,000

Calculated probability: 9e-7

Overall probability: < 1/1,000,000

Risk of this scenario: Low risk

Scenario 6 : Other consumers - Possibility to bite off small part from product

Product hazard

Hazard Group: Size, shape and surface
 Hazard Type: Possibility to bite off small part from product

Consumer

Consumer Type: Other consumers - Consumers other than vulnerable or very vulnerable consumers

How the hazard causes an injury to the consumer

Injury scenario: Seeds or beans are attractive to children. Children pick them out of the candle, put them in the mouth and it enters the trachea. The child is suffocated.

Severity of Injury

Injury: Suffocation / Strangulation
 Level: 4 Fatal suffocation / strangulation

Probability of the steps to injury

Step(s) to Injury	Probability
Step 1: Children pick seeds out of the candle	> 1/10
Step 2: Children put them in the mouth	> 1/10
Step 3: The seed enters the trachea	> 1/100
Step 4: The child is suffocated	100 %

Calculated probability: 0.0001

Overall probability: > 1/10,000

Risk of this scenario: Serious risk

C.7 Bathing mattresses

C.7.1 Identification of product and case, description of the context

This case deals with a type of bathing mattress, an inflatable airbed for seaside and pools made from PVC.



Figure C.4 Bathing mattress that emits phthalates.

C.7.2 Description of the hazards

The PVC contains a plasticizer: a substance to make the plastic flexible. In this case, the substance is bis(2-ethylhexyl)phthalate (DEHP). DEHP and other phthalates are classified in Annex I to Directive 67/548/EEC as a dangerous substance because of reproductive toxicity - Category 2 "Suspected human reproductive toxicant"; the packaging of this substance needs to carry the warning sentences R60-61 "R60: May impair fertility" and "R61: May cause harm to the unborn child".

In order to assess the risk of this particular product, we need to know whether DEHP can migrate out of the plastic and how much human exposure would take place. The first part of such a risk assessment is similar to the physical examples: describing one or more scenarios. After that, the probability is dealt with in a different way. We do not estimate how probable the scenario is, but how much of the substance the person is likely to get into his body. This can be done using (measured or estimated) data on release, transfer and absorption.

C.7.3 Description of injury scenarios and sensitivity

Injury scenarios	Injury type and location	Severity of injuries	Exposure parameters (Probability of injuries)	Resulting exposure (probability)	Risk
<p>Use by a 5 year old boy. The DEHP present in the air mattress is released from the surface.</p> <p>The released amount of DEHP is transferred to the skin via direct physical contact and rubbing with the skin.</p> <p>The transferred amount of DEHP to the skin is absorbed.</p>	Effects on reproduction	4	<ul style="list-style-type: none"> - Body weight: 16 kg - Release of DEHP: 7.4 $\mu\text{g}/\text{cm}^2/\text{h}$ - Transfer to skin: all released DEHP gets on an area of skin of 1500 cm^2, during 2 h per day - Absorption of DEHP: 5% 	104.6 $\mu\text{g}/\text{kg}_{\text{BW}}/\text{day}$	Margin of safety insufficient, Serious risk

Table C.4: Table of injury scenarios and associated risk levels for the bathing mattress case.

The risk in chemical cases cannot be directly be derived from the risk table, because there is no probability class such as '>1/100.000'. Instead, we have a dose, which is usually expressed in an amount per kg of body weight.

We then compare this dose with data on the levels that have been reported to produce the effect we mentioned under 'injury type'.

In this case, there are data on the highest tested level that did **not** produce the effect in rats: 4800 µg/kg_{BW}/day. Higher doses did give the effect of developmental toxicity. Toxicologists then say that the *No Observed Adverse Effect Level* (NOAEL) is 4800 µg/kg_{BW}/day.

The ratio between the NOAEL and the value calculated for the mattress is $4800/104.6 = 45.8$. This ratio is called the Margin of Safety (MoS). A MoS of 45.8 68.8 is not considered sufficient by toxicologists. It should be more than 100, because we need to take account that there may be differences in metabolism between rats and humans as well as between different persons (inter- and intra-species variability).

C.7.4 Conclusion

The MoS is not sufficient, therefore the product poses a risk. Because the effect that may occur is in the highest category and the margin of safety is well below 100, we consider this as a serious risk.

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