Baby Walkers

Joint Market Surveillance Action supported by the Executive Agency for Health and Consumers (EAHC)

Agreement No: 2009 82 04

Final Implementation Report

Covering the period 1 December 2009 – 31 December 2010

PROSAFE
Joint Actions
Best Practice

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INTRODUCTION

This is the Final Implementation Report prepared for the Joint Market Surveillance Action on Baby Walkers. In accordance with the Grant Agreement, the report has been issued by 28th February 2011 and it provides a concise overview of the Joint Action.

In accordance with Annex III in the Grant Agreement [1], the report includes, in particular, the following information:

Activities undertaken in the Joint Action:

- All activities undertaken throughout the Joint Action are described in chapter 2.
- This report makes a distinction between coordinating activities and activities undertaken by participating Member States (participants). The activities undertaken by participants are described in chapter 2.3 and coordinating activities by the coordinating body are described in chapter 2.4.
- Explanations for any differences between the foreseen activities in the detailed work programme (Annex 1 in the Grant Agreement [1]) and those actually undertaken are given in chapter 2.7. This chapter also includes an overview of the activities carried out additionally and not foreseen in the agreement.

Participants in the Joint Action:

- A description of how the participants have been involved in the Joint Action and which activities were undertaken is presented in Chapter 3.1. The account of how a balanced participation between the different organisations was achieved is given in chapter 3.2.
- The report shall also present an overview of all organisation and persons (by organisation), who participated in the execution of the Joint Action, indicating days worked and their professional category. Chapter 3.1 contains details regarding this issue. Differences between the foreseen and the actually realised participation in the project are presented in chapter 3.3.

Results of the Joint Action:

- Chapter 4 presents a description of the results of the Joint Action and the way they contributed to the overall objectives, making a distinction between the results obtained by the participants and by a test laboratory. The differences between the expected results and the objectives of the Joint Action and those actually achieved are explained in chapter 4.6. This chapter also includes an overview of additional results not foreseen in the Grant Agreement.

The final report also contains a comparison of the original budget and the financial outcome of this action. The Joint Action has been executed under the 2009 call for tender. Thus, the current reporting requirements may differ from the ones pertaining to actions granted under the call for tender from other years.

1 Background Information

1.1. Summary of Project Description

The full project plan can be found in [1]; the part 'Detailed work programme' as it is described in chapter 1.1.8.

1.1.1. Title of the Joint Action

Joint Market Surveillance Action on Baby Walkers
The European Commission supported financially the Joint Action, under Grant Agreement No: 2009 82 04.

1.1.2. Participating Member States

Stichting PROSAFE and 12 Member States (Austria, Cyprus, The Czech Republic, Denmark, Germany, Greece, Latvia, Lithuania, Malta, The Netherlands, Portugal and Sweden) signed the application for the Joint Action. Annex A gives an overview of the organisations and the representatives who actually participated in the action.

Two market surveillance authorities participated from Portugal, namely the "Directorate General for Consumers" (DG Consumidor) and the "Authority for Food and Economic Safety" (ASAE). ASAE also represented DG Consumidor in one project meeting.

The applicant body that took overall responsibility for the Joint Action is Stichting PROSAFE, the legal body behind PROSAFE.

An (new) independent subcontracted consultant, Mr. Berend Kamerling, performed the coordination of this Joint Action. Torben Rahbek, a consultant who helped with issues related to the daily management of the project, assisted Mr. Kamerling. The Project Leader of the Joint Action Michael Cassar from Malta and Berend Kamerling discussed these aspects.

1.1.3. Budget

The total budget costs for this project was € 218.136,98, out of which the European Commission funded 69,83% of the total costs that is the equivalent to € 152.327,23.

1.1.4. Primary Objective

The primary objective of the Joint Action was to ensure that the baby walkers placed on the EU market are safe and carry the appropriate warnings and instructions.

1.1.5.Secondary Objective

The secondary objective of the Joint Action was to gain experience by applying the provisions of the standard EN 1273:2005 and to assess the level of compliance found on the market place.

1.1.6. Objectives and Stages of the Project

During the first and second stage of the project, the secondary objective - to gain experience by applying the provisions of the standard EN 1273:2005 - is highlighted. Participants carried out the monitoring of EN 1273:2005, chapter 7 'Product information' on baby walkers, while they simultaneously sampled the baby walkers for the joint testing in the laboratory according to EN 1273:2005, chapter 5 'Construction'.

The combined gained experience of monitoring and receiving test results on the baby walkers samples should be well applicable in the third stage of the project, where market surveillance in the area of the economic operators has been stressed.

1.1.7. Deliverables of the Joint Action

The primary objective of the Joint Action was to ensure that the baby walkers placed on the EU market are safe and carry the appropriate warnings and instructions. Thus, the deliverables

of the project intend to bring about a reduction of the amount of the baby walkers on the European market, which are unsafe and are missing warnings and instructions or have them incompletely stated. The secondary objective (1.1.5) serves this primary objective (1.1.4).
The deliverables, enumerated from *D1* until *D11* in the project description, form a separate Annex D to this Final Implementation Report. They are the following:

D1 Kick-off meeting: minutes (a), attendance list (b);
D2 First project meeting: minutes (a), attendance list (b);
D3 Implementation Planning (Gantt Chart);
D4 Terms of reference for testing laboratory;
D5 Selection of laboratory;
D6 Second project meeting: minutes(a), attendance list(b), v-calculations(c), d-calculations (d);
D7 Interim Report;
D8 Results monitoring(a), results testing (b), results mass effect (c), parameter data setting (e);
D9 Third project meeting: minutes (a), attendance list (b);
D10 Final workshop: minutes (a), attendance list (b), final meeting minutes (c), attendance list (d), minutes importer's visit (e);
D11 Final Implementation Report.

For this Final Implementation Report, which covers the whole Joint Action for the period 1st December 2009 – 31st December 2010, Annex D includes the deliverables from D1 until D10. However, D7 - 'Interim Report', which covers the first half of the project year, has already been published in August 2010.

1.1.8. The Joint Action Activities

The activities of the Joint Action were divided according to three stages. This Final Implementation Report covers all stages, it is separated into participants' activities, and coordinating activities, as defined in the detailed work programme:

First stage activities 1st December 2009 – 31st January 2010.	**First stage** activities 1st December 2009 – 31st January 2010.
Participating Member States	Coordinating body
• Check baby walkers on the market; • Possibly check border controls of consignments with baby walkers; • Exchange information on tested samples and results; • Participate in one project meeting.	• Organise, prepare and participate in one meeting; • Facilitate the discussion of a common sampling scheme; • Install and operate suitable means and procedures for exchange of information on baby walkers; • Study feasibility of baby walkers. If feasible, install a procedure for joint testing; • Answer questions on coordination issues; • Prepare progress reports.
Second stage activities 1st February 2010 – 30th June 2010	**Second stage** activities 1st February 2010 – 30th June 2010
Participating Member States	Coordinating body

• Check baby walkers in retail stores and at wholesalers, importers, and manufacturers, including, if possible, inspections of consignments with baby walkers at borders; • Laboratory testing of baby walkers; • Participate in two project meetings.	• Organise, prepare and participate in two meetings; • Operate means of exchange of information on tested baby walkers; • Update procedures, inventories and forms; • Answer questions on coordinating issues; • Prepare progress reports.

Third stage activities 1st July 2010 – 31st December 2010	**Third stage** activities 1st July 2010 – 31st December 2010
Participating Member States	Coordinating Body
• A final report is prepared; • Participate in the preparation of the final report; • Participate in one project meeting and in the final workshop.	• Organise, prepare and participate in one meeting; • Prepare final report; • Organise, prepare and participate in the final workshop.

Table 1: the three activity stages in the Joint Action on Baby Walkers

The First Stage of the Project

This stage comprised the start-up of the Joint Action, including a trial to establish the first initial overview of the market for baby walkers and the share of dangerous items. Procedures and reporting forms were developed and experiences from previous actions and RAPEX notifications in the Member States were collected.

The Grant Agreement and the administrative issues have been clarified and special attention was given to the general and specific objectives of the Joint Action. Each participant received a handout containing the standard EN 1273:2005, which was introduced in relation to the GPSD, as a recent harmonised standard, and the manner of sampling, test purpose and test items.

The playing field and obligations of the different economic operators were addressed in the kick-off meeting and following project meetings. Furthermore, participants agreed on joint testing, given the previous satisfactory experiences. They have also discussed the developed methods of monitoring and sampling and the procedure to prevent doubling up the samples sent to a laboratory for joint testing.

The coordinator asked the participants to send him the addresses and references of appropriate laboratories, in order to invite them to participate at a call for tender. The total number of the samples was established based on the relation between the available test budget and the negotiations of testing price per baby walker sample. Given the fixed test budget, the lower the laboratory unit price was, the more samples the participants could have been collected for testing.

The Second Stage of the Project

A call for tender was issued to assess the laboratories' 'capacity to test' in the Joint Action. A suitable laboratory was chosen out of seven received tenders. The selected laboratory and the Board of PROSAFE signed a contract for testing activities. Monitoring and sampling among the participating countries was completed at this second stage.

In this stage, an important part of the testing by the laboratory could was also carried out. After having had tested a received sample of a baby walker, the laboratory sent the signed

hardcopy of test report to the related participant within a week. An e-version of the test report was also sent to the coordinator. Following the coordinator uploaded all the test reports, which were made available throughout the action, on WebEx; the web platform used by PROSAFE members for disseminating information.

Moreover, within this Joint Action's second stage, the developments concerning the update of an American voluntary standard for baby walkers into product safety legislation, have been followed and discussed at the second project meeting in June. This meeting, held at the test laboratory, gave a perfect opportunity to explain all the test items from the standard EN1273:2005. The meeting attendees discussed the test results up to that date and related them to the US developments; two heavier baby walkers was tested at enlarged launching distance to check a well-known formula. Appointments were made concerning enforcement along the chain of relevant economic operators, or at least amongst those sampled brands which failed on crucial test items of the EN 1273:2005.

The Third Stage of the project

At the third meeting the completed programme for sampling, monitoring and testing was discussed. Member States had started enforcement activities to economic operators on sampled baby walker brands, which did not meet the standard requirements. The specific test report results served as a basis for those activities. The coordinator brought in experiences and some specific test results from the Joint Action during a CEN TC252 WG1 meeting in Amsterdam in October.

A half-day workshop was organised for participants and stakeholders on 15th November 2010, in Brussels, to present the results of the Joint Action. ANEC/ECSA (European Child Safety Alliance), the Baby Products Association (UK) and CEN participated in the programme by giving their views in presentations and discussions. Representatives of the University of Graz, Austria, delivered an accident analysis within Austria.

A final meeting was organised on 7th December 2010, where the participants presented and discussed 'country reports' regarding enforcement activities in Member States. Discussions regarding this Final Implementation Report in draft version took place and the remaining administrative matters and disseminating issues were dealt with. On 17th December, a visit was made to a Polish importer, in order to asses the importing process and the measures taken subsequently to RAPEX notifications of two participating Member States, who both found the importer's non-compliant samples on their national market.

A number of tools, methods and practices that have been described or developed in the context of the EMARS II project (and its predecessor EMARS I) were used in the Joint Action and experiences were reported back to the EMARS II project leaders of Task A, Task B, Task D and Task G in particular. Task A deals with further development of best practice; Task B develops best practices for Joint Actions. Task D provides market surveillance material for external stakeholders (e.g. customs). Task G concerns improvements and developments on Standards.

The Joint Action also included activities to liaise or share information with the European Commission and stakeholders, such as the ECSA (European Child Safety Association), ANEC, Baby Products Association (UK) and CEN.

1.2. Other Background information

1.2.1. The European Market

The participating Member States collected some rough information about the market situation in their territories at the start of the Joint Action. This information and a RAPEX survey over the last ten years formed the background overview of the European market that shaped the foundation for this report. Moreover, Sweden delivered very useful market surveillance information on recent test programmes on baby walker brands, data that is included in a report [8]. It is difficult to get an overview of the turnover of specific baby walkers. The reason for this is that the deliveries to the European market are statistically recorded under the figures for childcare articles and equipment. From a physical point of view, these deliveries of baby walkers are mixed up in the transport containers with products as toys, household appliances, etc. Many small (Internet) importers are not organised in a business organisation or nor in a relevant entity related to baby walkers.

The Customs Authorities in the Baltic Sea network have not been considering baby walkers a 'sensitive product' over the years, in order to pay special attention to them. However, one may roughly estimate that ninety percent of the baby walkers, found overall European market, are imported from outside the European Union. The main exporters to EEA (and USA) are China and Taiwan. Within the estimated 10% share of baby walkers, which are produced inside the EU, it is likely that also an important share of mounting parts are imported from the Far East. Chinese manufacturers/traders easily attract 'buyers' worldwide by 'electronic car shopping' via websites like www.made-in-china-com, www.alibaba.com, for minimum orders of 300-500 units with low unit prices varying between US $ 1-20.

1.2.2. Risks and Accidents

There is a general concern among experts in child safety about baby walkers because they present several serious risks for children. For that reason, one must say that keeping a lose watch on an infant is the best way to prevent hazards. Infants who propel baby walkers by themselves have no awareness at all of the risks. They simply discover the world, being unaware of its potential hazards. Therefore, it is important to realise that certain features on baby walkers cannot compensate for the attention and care, which a child should receive. In the category of risks, the hazards concerning baby walkers most likely to occur are:

- Children falling down the stairs when entering rooms, which contain downward leading stairs, or passing through open doors. A fall down the stairs often leads to severe (head) injuries, skull fractures, brain contusions, bone fractures and it can even be fatal. A downstairs fall means the upside down propelling of the baby walker caused by the lowering of the centre of mass in the child/walker combination.
- When scouting around in a baby walker, children show a free and rather un-coordinated movement of arms. They can have a large reach in an upright standing position, which exposes them to hazards whilst exploring the environment. Such hazards may be burns, scalds, poisoning or other injuries, for instance, as they pull down the hot water kettle by stumbling upon the hanging electric power cable/-cord or by being stimulated to reach for it by a (heavy) child appealing attribute. Another example is reaching for the household chemicals from the (kitchen) table (reach down risks).
- Infants in a baby walker who can easily reach speeds of 4,5 km/h can hit against walls and furniture, or bump and even 'tip over' at curves or uneven surfaces and seriously hurt themselves.
- Some baby walker folding mechanisms could collapse under the infant weight or by 'under table' (dislocating) movements/pushing, with the risk that fingers, arms or legs can become entrapped.
- A number of baby walkers have insufficient stability; a child could injure himself when turning over. This happens when the child hangs sideward outside the baby walker supported by leg pushing and a sudden uneven floor (e.g. carpet edge).
- Some baby walkers have narrow circular holes in the area easily accessible by the infant, in which he could entrap his fingers in a dangerous way.

- Certain baby walkers have sharply shaped material edges with risks of injury in the infant access zone.
- Baby walkers often have a (de-)mountable playing tray with different toys, which could pose a risk to the child by themselves, such as choking or swallowing by ingestion of un-fastened small parts.

Accident history shows that casualties caused by baby walkers can be very serious or even fatal. For example, the Austrian statistics, collected by the Paediatric Surgery Department of the Hospital of Graz/Medical University [11], revealed that in baby walker accidents (n=87 in 2008), the following body regions were most injured: 96% the head, 3% the upper limbs and 1% the trunk/chest. Within the same statistics, a classification according to the type of abrasion showed that 64% of the injuries were head contusions, 10% – head concussions, 4% – skull fractures and 23% – other injuries.

Concerning the circumstances in which baby walker accidents happened (n=110 in 2008): 81% of them were falls down the stairs, 16% – tip over's, and 3% – collisions with objects. The connection between "falls down the stairs" combined with "child's up side down's" with the baby walker and the (severe) head injuries seems to be evident.

1.2.3. Regulation and Standardisation

The safety of baby walkers falls under the General Product Safety Directive. It recommends that producers may only place safe products on the market. One may presume that, for a number of products, this may be the case if the respective product complies with a standard, whose reference is published in the Official Journal of the European Union.

For baby walkers, the European standard EN 1273:2005 [2] has issued safety provisions in "Child use and care articles – Baby walking frames – Safety requirements and test methods".

However, this 2005-version of the standard, referenced in the Official Journal [3], is more or less duplicated from the American standard ASTM F 977 – 07. After undergoing an improvement process in 2010 [4], this American voluntary standard has attained a legal status under the US – CPSIA (Consumer Product Safety Improvement Act), section 104, and comes into force in December 2010.

CEN/TC252 WG1 has followed these developments and decided on a revision of the EN 1273:2005 during their plenary meeting in London on 1st September 2010 (resolution 274). WG1 will carry out this revision work and, within this Joint Action period, it already had start-up meetings on 19th October in Amsterdam and 15th December in Milan.

1.2.4. The European Situation before the Joint Action

Some of the participating Member States had undertaken market surveillance activities on baby walkers before the Joint Action started.
In addition, testing activities have taken place earlier (see 1.2.1). A suggestion from one of the participants to conduct a search on RAPEX has been carried out by the coordinator.

RAPEX

The Rapid Exchange system between market surveillance authorities, created to exchange public information concerning enforcement actions as withdrawals from the market, has consequences throughout the whole EEA. The system delivers reports and continuous increasing notifications since 2005 [5]. Consumer products have been classified in to twenty product groups or categories (further: cat.). Baby walkers belong to the large variety of products in the product group "child care articles and children's equipment (CCAACE)". Each RAPEX monthly report defines a number of 'changing' categories, which, on monthly average, represents approximately 80% of the notifications done by Member States.
In the year before this Joint Action (2009), the RAPEX notifications presented the following picture. In four months of the year 2009, the category CCAACE joined the 80% notifications group:

- *February 2009:*
  Seven % out of 165 notifications belonging to the 14 cat., which forms 81%.
- *March 2009:*
  Six % out of 178 notifications belonging to the 16 cat., which forms 71%.
- *June 2009:*
  Six % out of 198 notifications belonging to the 20 cat., which forms 77%.
- *September 2009:*
  Nine % out of 105 notifications belonging to the 14 cat., which forms 83%.

However, only four baby walker cases (shown by the reports below) were found in 2009 among the CCAACE. The baby walker cases are described in the weekly reports:

2009/Week 40: Brand: baby Seat Mars, two accidents, origin China. Voluntary withdrawal in NO, non complying EN1273, Risk: choking of small parts on activity board.	
2009/Week37: Brand: unknown, model 3290 A15, origin China. Product ban + recall in BG, non complying EN1273, Risks: sharp edges, unsafe locking mechanism.	
2009/week37: Brand: unknown, model 3293-3, origin China. Inscription on baby Walker: ' Have a nice time' Product ban + recall in BG, non conforming EN1273, Risks: sharp edges, unsafe locking mechanism.	
2009/week17: Brand: Haberkorn, Funny Tom, land of origin China. Voluntary withdrawal in AT non complying EN 1273, When pushed over an edge, it does not come to a halt. Not equipped with any kind of device, which would prevent a fall downstairs.	

Table 2: RAPEX reports of baby walker cases in 2009

For previous years, dating back to 2005, it presents a comparable picture for baby walker notifications. For the year 2008:

2008/Week43: Brand: Maggiolini, model V249, origin Italy (2005). Ordered withdrawal in CZ, non complying EN1273, despite satisfying warning pictogram and EN mark  Collapsing risk, unsafe folding locking mechanism. The product poses a risk of injuries because : - It collapses when a force of less than 200 N is applied and maintained for two minutes, - When lifting the upper part of the baby walker, without using any control mechanism, at a force below 50 N, the baby walker may fold.	

Table 3: RAPEX reports baby walker cases in 2008

2007/No baby walker notifications	
2006/week44: Brand: unknown, importer model 819RN origin China Product ban + recall in BG, non complying EN1273, Risks: - The length and height of the seat are smaller than required; - There are sharp edges and the shape of the edges is not as required; - There is only one locking mechanism although two are required; - The folding mechanism executes without device and can be released with a power of less than 50 N and in one action; - The baby walker broke during the tests for stable strength, and for dynamic strength,	
2005/ No baby walker notifications.	

Table 4: RAPEX reports baby walker cases in 2005/2006

1.2.5. The International Situation

The safety of baby walkers is considered an issue in other territories. In 2000, the US Consumer Product Safety Commission (CPSC) issued a report on Nursery Products [6] including baby walkers.

For children under 15 months, the number of baby walker-related injuries dropped almost by 60%: from an estimated 20.100 injuries in 1995 to 8.800 in 1999. In the period 1995-1997, eight deaths were reported. During those years, CPSC worked with industry to revise the voluntary safety standard for baby walkers, which resulted in safer baby walkers on the market. In addition, stationary activity centres, an alternative product, came on the market.

Injury and death scenarios: primarily falls down stairs in baby walkers.

The CPSC staff worked closely with ASTM to revise the industry voluntary standard for walkers to include requirements to address falls down stairs. The revised standard was completed in 1997. Baby walkers that meet the 'new' stair-fall requirements must:

1. Have special features that stop the walker at the top step, or
2. Be wider than a 36-inch opening, the size of most US doorways.

The report looks positive. However, the industry was never willing to meet the 36-inch clause.

Nowadays, the common models of baby walkers on the world market can pass through a standard door easily. After two revisions of the ASTM standard, many recalls in the US illustrate that producers still do not accept this easy way to fulfil a clause, and the features used to stop the baby walker at a step often fail or were not present. A number of such recalls have occurred over the last years.

The recalls listed below illustrate these important shortcomings, which have appeared since 2000. In all these recalls, the baby walker will fit through a standard doorway and the producer had not designed them to stop at the edge of a step. They are mostly all imported and have originated from a country in the Far East.

Date	US Recall no.	BW Units	Country of origin
14-06-2000	R # 00-124	31.000	-
08-08-2000	R # 00-157	170.000	USA
01-02-2001	R # 01-076	3.356	USA
27-08-2001	R # 92-033	11.000	-
09-10-2002	R # 03-009	50.000	Far East
10-10-2002	R # 03-012	3.500	Far East
21-11-2002	R # 03-043	410.000	China
10-09-2003	R # 03-182	4.100	Taiwan
02-06-2004	R # 04-148	20.000	China
28-09-2004	R # 04-225	1600	Taiwan
11-02-2005	R # 05-103	12.000	Taiwan
01-02-2006	R # 06-077	600	China
01-02-2006	R # 06-079	2500	China
16-10-2008	R # 09-014	800	China
15-04-2010	R # 10-198	200	Taiwan
22-06-2010	R # 10-269	8400	China
Hazard:	The baby walker will fit through a standard doorway and is not designed to stop at the edge of a step		

Table 5: US recall reports baby walker since 2000

2 Activities undertaken in the Joint Action

2.1 Overview of Activities

This chapter presents all activities undertaken in the Joint Action. One may find detailed descriptions of the activities in the chapters 2.2 – 2.7.

- Project management activities:
  - Selection of the consultant:

    The first activity in the Joint Action was to select a consultant to manage and coordinate the Joint Action. Stichting PROSAFE appointed an individual by drawing from its pool of consultants. This consultant was then engaged and a contract drawn up for signature.
  - Management of the Joint Action:

    The consultant developed a couple of tools and documents to facilitate the follow up of the operational stages in the Joint Action. The several tools and documents were discussed at the meetings in the project group.
  - Planning and Progress:

    An implementation planning (Gantt Chart) which served as a planning instrument has been developed for coordination activities, preparation activities and the implementation phases.

    The timeline for the deliverables has been given. The Chart is used every meeting to present an overview. The planning is given under Annex D, deliverable D3 'Implementation of the Planning'.

    In an effort to raise transparency, a representative from the European Commission attended all project meetings, where the coordinator and the participants presented the progress made in the Joint Action. The invited stakeholders joined some of the meetings.
  - Tool for collecting time spent by the contributing participants:

    The coordinator developed an Excel sheet and distributed it to each of the participants, in order to present an ongoing overview of their total spent days in the Joint Action, accordingly to their delivered monthly time sheets.
  - Interim report:

    An interim implementation report was produced and published in August 2010. It covered the period 1 December 2009 – 30 June 2010.
  - Filing in documents:

    Under the button 'Baby Walkers' within the PROSAFE WebEx web service, a document depository has been created, where all documents produced by the Joint Action are stored e.g. regarding meetings, tender results for test laboratories, monitor- and sample results, tests results. The participants have also contributed with important documents, which have been uploaded onto WebEx as well.

    Examples are the Swedish Market Surveillance Report on Baby Walkers 2008-2009 [8] mentioned in chapter 2.3.1. and the Austrian study on baby walkers [11] mentioned in chapter 1.1.2.

- Project Meetings:

  The Joint Action is required to organise four project meetings and a final workshop over the course of the whole Joint Action. An extra final meeting was arranged to discuss this final report and finalise the administrative issues. In the June 2010 meeting, the workshop and the final meeting stakeholders were invited. The coordinator produced invitations, agenda's, and minutes, attendance lists of participants and documents / presentations for the meetings. The chapter 2.2 gives more information on this topic.

- Selection of test laboratories

  The participants decided among themselves to run jointly the laboratory tests. A call for tender was prepared and issued and quotations were received and assessed. The outcome of the call for tender resulted in selecting test laboratory "Instituto Italiano Sicurezza dei Giocattoli" (IISG). A contract was drawn up and signed. More information can be found in chapter 2.4.1.

- Monitoring and assessing the sampling of baby walkers

  The coordinator drafted a sample list with monitor items and a running list to be able to follow the progress among participants and to update regularly the situation during the sampling period. The participants have assessed both lists at the meetings. The sample list included also two photos of the baby walkers. The coordinator verified each baby walker before sending it to the laboratory for testing to prevent 'double sampling '. More information concerning this issue and a short description of the procedure are given in chapter 2.4.2 and 2.4.3.

- Preparation for testing

  A procedure for doing joint sampling and testing was set out. Instructions for the submission of baby walkers to the laboratory were developed. More information can be found in chapter 2.4.4.

- Testing

  The IISG has tested thirty-six baby walker samples. Test reports were uploaded to the document depository from WebEx. Moreover, two heavier baby walkers have also been examined regarding the effect of mass on speed. One may find detailed results in chapter 4.4.

- Drafting and updating of miscellaneous documents

  The coordinator has produced a number of documents to capture the monitor and test results up to date, but also in stages of different versions, in order to inform regularly the participants.

- Dissemination activities

  A contribution ("article") about the kick-off of the Joint Action was integrated in the PROSAFE newsletter. The stakeholders ECSA and ANEC were kept informed concerning the meetings and the meeting documents. An information exchange has taken place regularly with the relevant standardisation committee, with respect to the 'standard' developments on baby walkers in the US. All stakeholders were present at a half-day workshop in November, which was organised to discuss the monitor - and test results of the Joint Action (One may find a detailed description in chapter 2.5.1).

  The Joint Action has published two Press Releases: one concerning the tests and one at the end of the Joint Action. More information can be found in chapter 2.5.2.

- Awareness-Raising Activities

  Several activities were undertaken to involve the stakeholders ECSA, ANEC and the European Commission (DG Sanco) in the Joint Action (see 2.6.1). At a final workshop, the members of the Joint Action presented the results of the project to the stakeholders and the other interested parties.

Preparations for a future outreach to the Chinese Authorities and manufacturers are made. These are described in 2.6.2. In USA, during the running time of this Joint Action, the legislation on baby walkers was developed by improving and implementing a voluntary ASTM standard. In Europe, the relevant working group within CEN TC252 has followed and discussed this development, in order to stimulate the revision of EN 1273:2005 on certain important items (see further 2.6.3).

2.2. Meetings

2.2.1. Project meetings

The Joint Action has organised four project meetings as foreseen in the original project plan. Annex D, namely deliverables D1, D2, D6 and D9, comprise the minutes of these meetings. The meetings were as follows:

- 27th January 2010 in Brussels

Kick-off meeting (D1). The PROSAFE CEO introduced the new Joint Action coordinator, Berend Kamerling, and Mrs. Antonella Correra, who presented the views of DG Sanco Consumer Affairs in front to the participants.

A Project Leader, nominated from amongst participants, was not yet found. The CEO stressed the importance of nominating a willing participant, and he agreed to make an appeal during the next meeting. In the meantime, the coordinator took the role of Chairman.

The purpose of the meeting was, firstly, to present the Joint Action to the participants and to the European Commission and, secondly, to discuss the involvement of stakeholders and the interaction with the EMARS II project. Thirdly, the meeting also tackled project management issues like the Guide to 'Reimbursements and registration of working hours'. In addition, the coordinator introduced the WebEx document depository.

Fourthly, the meeting involved a presentation of a document concept project plan and a discussion on the Joint Action on Baby Walkers with respect to some background information, the objectives of the Joint Action, test purpose and test items and the three-implementation phase from the Grant Agreement. Together with this, the coordinator dealt with the expected deliverables and the delivery dates. The playing field and the eventual interventions, which took place later on in the Joint Action, were based on an expected non-compliance of the test results of the samples. The participants have also discussed this topic, including the obligations of the economic operators.

We decided, if possible, to record the 'point of sampling' in the market. It was agreed that sampling should take place as high up in the 'trading chain' as possible, to facilitate eventual enforcement actions later on (stage 3 of the Joint Action). The collaboration with customs could help (for more information see chapter 2.3.1).

The participants also discussed the prepared document 'Sampling and Testing'. They decided to organise a jointly laboratory testing to save money and to get full comparable results. The test budget raised a discussion about the number of tests and the representation needed for choosing the type and the size of a sample, which should be validly representative for the whole EEA market. It was noted that with an estimated unit price of €800 and a test-budget of €16,000, 20 samples would be an adequate minimum. We would certainly welcome any lower bids, in order to decrease the unit price by negotiating with the test laboratories down to €400. This manner we could carry out a more representative number of tests within the budget. Therefore, it was decided only to test the properties that were most critical to the safety of the baby walkers (see below in chapter 2.3.2).

Following up a suggestion coming from the participants, we embarked upon the idea that we would save money by charging the sampling inspectors with the task of monitoring the items of EN 1273, chapter 7 – 'Product information' – instead of asking the laboratory personnel to act on it. This chapter includes the obligations to mark the product and write down the required warnings, the purchase information around the product and the instructions for use belonging to the product supply (see below in chapter 2.3.3). Furthermore, the coordinator requested

the participants to deliver addresses for suitable test laboratories, while the coordinator prepared the call for tender.

- 25th February 2010, in Brussels

First project meeting (D2). A published PROSAFE newsletter (No. 11) with information concerning the kick-off of the Joint Actions 2009 was distributed. Participants were invited to use the letter to inform their own national (stakeholder) organisations. The Gantt Chart, attached to the minutes (see Annex D: D3), was consulted to discuss the next stage: selecting a test laboratory and sampling of the baby walkers on the market. On the 15th February 2010, the call for tender went to seven delivered laboratory addresses from Denmark, Portugal, the Czech Republic, the United Kingdom, Italy, Spain and Sweden. The call for tender ended on 15th March 2010.

PROSAFE made a selection based on the discussed items and by taking in consideration the experience with the previously employed laboratories. PROSAFE discussed the strict closing date of 15th March, the desired quality and the selection criteria. A choice was made in a restricted 'test content' of the standard (see chapter 2.3.2 below).

Concerning the sampling, a market surveillance code (MS code) was created to facilitate an easy internal information exchange. In addition to this, the coordinator and the participants dealt with a sample list, a sampling procedure and an order list, which would facilitate and regulate the exchange between the participants, the coordinator and the test laboratory.

- 30th June 2010 in Cabiate, Italy,

This second project meeting gave an occasion to the participants to discuss the first test reports, which the laboratory had sent in. The organisation of a meeting at the laboratory, in Cabiate, created the perfect opportunity for participants to visit the laboratory and to gain a good impression regarding the testing and the test procedures.

The second part of the morning was reserved for questions concerning the laboratory visit, test items, specific questions regarding the tested samples and a demonstration of how the tests are being carried out. An IISG expert, member of the standardisation working group that had dealt with the setting up of the first version of EN 1273 n in 2001, gave a short and clear presentation regarding the test items in chapter 5 'construction' illustrated by observations taken from the samples. WG1 is the working group who had dealt with the set up of standard EN 1273:2005 and this became 'more or less' a copy of the American voluntary standard ASTM F 977-07 on baby walkers. The importance for the WG of the US Consumer Product Safety Commission's (CPSC) decision from 26th May to give the voluntary standard a legal status under the Consumer Product Safety Improvement Act (CPSIA) was also discussed.

Notably, the improvements suggested in this final rule proposal should be addressed in a future revision of EN 1273:2005. Amongst other things, the coordinator mentioned the need for an improvement by calculating the launching distances in the step fall tests and the dynamic stability test, as opposed to the recent fixed distances for a 3,6 kg mass standard baby walkers. Nowadays, baby walkers can be considerably heavier. In Europe, for the heavy baby walkers it should not be easy to pass the step fall tests simply because the standard on this item had not been revised. The Project Leader and the coordinator agreed to continue this discussion after the participants had departed at 15.00 for their various flights. This expert discussion, prepared by the coordinator, has led to an agreement regarding deliverables D6c and D6d in Annex D.

After lunch, during the closed part of the meeting, attention was given to that current development in the US with regard to the ASTM standard, which is comparable to EN 1273. The document 'Suggestions for Next Standard Revision' written by the coordinator was handed over to CEN WG1. Some participants wanted a description and an analysis of the tests of the two heavier baby walkers, which IISG had in the test programme. This was agreed.

The preliminary collection of information from the available monitor/sample lists, filled in by the inspectors charged with the sampling, was discussed. However, a final analysis is planned after the completion of the information gathering of all samples.

After the consultation of the implementation plan (Gantt-Chart) participants agreed to schedule the next meeting later than the given date, which was prescribed for the end July. The next meeting day was fixed for 16th September in Brussels. The expectations were that the analysed test results and monitor results could be discussed and that the participants could present the first results concerning enforcement activities related to sample brands that failed in the test (non-complying to EN 1273). It was strongly stressed that enforcement should take place along the whole trading chain of economic operators to ban dangerous baby walkers or to recall them from the market. The importance of notifying the non-complying products that are posing a serious risk on RAPEX was also emphasized. It should also give a better and more extended view on the market by assessing the level of compliance of the standard in the market place. Furthermore, the participants began the planning of the final workshop.

- 16th September 2010 in Brussels

During the third project meeting, the participants and the coordinator discussed and presented the results of the completed programme of the Joint Action for monitoring and testing.

Based on the hard copy test reports received from the laboratory, some Member States had already embarked on enforcement activities with the economic operators, whose samples of non-compliant baby walkers were found on the market. This first session of feedback led to the agreement that participants would deliver a 'country report' concerning their enforcement actions at an 'extra' of the final meeting.

Between the end of June and the end of July, the participants had the opportunity to react on the Draft Interim Report of the Joint Action, which was released on 1st July 2010. The coordinator received some linguistic comments to improve the report's legibility. This meeting was in a good position to issue a press release regarding the results of the Joint Action. The Project Leader wrote a draft press release. The members of the Joint Action agreed to issue the press release to the stakeholders and the PROSAFE network. Participants promised to do the same in their national area, after translating it in their mother tongues.

- 7th December 2010, in Malta

At this extra planned meeting (final meeting); the participants presented their country reports based on the actions taken against the importers, whose non-compliant baby walkers were discovered on the EEA market and than sampled by the inspectors. With an average of three samples per Member State, all participating Member States, except Sweden, had among their tested samples, one or two non-compliant baby walkers. One Member State sampled and tested four brands, out of which all four were found to be non-compliant. In all cases, failing on the step fall test (clause 5.12 of EN 1273) has led to voluntary or obligatory withdrawal from the market. For some shortcomings pertaining to the warnings labels/stickers, marking or the instructions for use, the importers received the opportunity to arrange improvements or corrections.

A final news release has been drawn up for distribution among stakeholders.

Regarding the Draft Final Implementation Report, which was received beforehand, the coordinator collected comments and inserted them in the report, prior to its publishing at the end of 2010.

2.2.2 Other Meetings Attended within the Framework of the Joint Action

Representatives from the Joint Action attended the following meetings and events:

- The PROSAFE Project Core Group meeting, 28thApril 2010 Malta;
- The PROSAFE Spring meeting of the General Assembly, 29th-30th April 2010, Malta;
- A meeting with an expert of CEN TC 252 WG1 baby walkers, 30th June 2010, Cabiate,
- PROSAFE presented the Joint Action on Baby Walkers at the Consumer Safety Network Meeting on 18th June 2010, together with the other Joint Actions that had commenced in 2009.

- The coordinator attended the first CEN TC 252 WG1 Meeting in Amsterdam, where WG1 members started the revision process of EN 1273:2005. He gave a presentation on the results and experiences collected in the Joint Action. Furthermore, he handed over the respective results to serve improvement process of the standard. In addition, the coordinator distributed his document "Considerations for further analysis of EN 1273:2005" [7] to the workgroup members.
- The PROSAFE Risk Assessment Seminar, 3rd December 2010, Brussels.

Further to this, the Project Coordinator and Project Leader participated in several core group meetings organised under the EMARS II projects in Brussels.

2.3 Activities Undertaken by Participants

2.3.1. First Market Surveillance Overview

At the start up of the Joint Action, the participants were invited to collect market surveillance information from the recent and earlier past in order to deliver a first overview of the European market.

The Czech Republic reported an action on baby walkers in 2004. The market surveillance authority 199 inspections and they have found deficiencies in 23 cases. As an outcome, the authority removed fifteen different types of baby walkers from the market and none of them had met the requirements of standard EN 1273:2005. The selected samples failed to comply with the requirements on seat height, safe holes, round edges, instructions and warnings in the national language and labelling of the product standard. The inspectors found the following hazards: the risk of pinching fingers, cords on toys, easily removable stickers on the product, etc. However, no 'step fall tests' were executed to judge clause 5.12 'Prevention of falls down steps'. The ban was imposed to 159 baby walkers with a total value of €4400.

In Sweden, specific baby walker investigations on the requirement 5.12 'Prevention of falls down steps' of the standard EN 1273:2005 have been carried out in 2005 and later on in 2008/2009. From the Swedish Consumer Authority (SCA) Report 2009: (market surveillance 2008-2009), published by SCA [8], one can derive that, regarding the 'Falls down step tests' in 2005, only one out of 13 baby walkers (8%) passed the related test stages. This happened in spite of the fact that the market had been clearly informed that baby walkers had caused a large number of falls with cranial injuries, as the children push them down stairs.

In 2008, the SCA has carried out again a surveillance programme on how the safety requirements of the standard regarding stairs are being followed. However, the number of baby walkers which failed to pass this test increased to six (55%) out of the 11 baby walkers that were tested. This was a reason for the Swedish Consumer Authority to emphasize to the economic operators that the measures had proven to be insufficient. The SCA has been in touch with businesses that have supplied the relevant baby walkers recommending them to investigate further the individual products and offering them the opportunity of voluntarily taking suitable remedial measures. The large increase, which took place over those three years, is unlikely to be a national manufacturer's problem, but it seems to be an import problem.

Lithuania, one of the members of the 'Baltic Sea Market Surveillance Network', an associate of Market Surveillance Authorities from the Baltic Sea Area (EE, LV, LT, FI, DE, and SE) with the Custom Authorities, announced an interesting piece of information.

At the start of the Joint Action, the fifth report of cooperation with results and a progressive concept for the cooperation with customs has been published [9] in December 2009.

While in 2008, the efforts were addressed to product groups (travel adapters, extension cords, and bicycle helmets) and corresponding checklists, in 2009 the focus was on Custom Authorities' tools such as custom code, risk profiles, customs database checklists and the capabilities of market surveillance authorities. Although checklists had been reduced to only a few criteria, customs authorities from the Baltic Sea Area reported almost unanimously that the lists featuring technical details of a visual check are not practical for customs personnel. They usually do not have the technical training. Moreover, the variety of products makes it impossible for them to provide such an expertise. Trained market surveillance personnel

carried out the inspection. Although, the Baltic Sea States have such surveillance programmes on an annual basis, as it is reported in [9].

Our Lithuanian participant proposed that baby walkers are not yet regarded as a 'sensible' dangerous product. The reason behind this may well be revealed when the outcome of laboratory tests delivers the criteria for a 'simple' checklist for carrying out market surveillance activities in a next custom programme. To anticipate on such a programme, the participants will set up an 'easy to operate' checklist for baby walkers (see further 2.5.1.).

2.3.2. Market Representation

The participants noted that, with a test budget of €16000 and a unit price of €800 euro as mentioned in the project plan, 20 units would be a minimum number for samples. It would be welcomed if the coordinator manages to lower the unit price per test by negotiating down to €400 with the test laboratories, in order to get a more representative number of 40 units. This would mean approximately three samples per participant on average. For the prices to be realistic, the project has to decide to carry out tests for a limited part of the EN 1273:2005, nevertheless, the most important parts of the standard, namely, chapter 5 'Construction': clauses 5.11, 5.12, 5.13 and at least 5.12: 'Prevention of falls down steps'. This clause includes the tests, which (derived from literature and earlier experience) have a strong relationship with the most severe known accidents. The Swedish participant remembered that the Swedish test programme (see 2.3.1), had even been restricted to clause 5.12 from chapter 5: 'Prevention of falls down steps'. It will be a challenge for the coordinator to negotiate down to a reasonable unit price, in order to target the testing of all clauses of chapter 5 'Construction'.

2.3.3 Monitoring

In preparation for the joint testing of baby walkers from all over the 12 participating Member States, it has been appointed that participants would combine sampling of baby walkers and monitoring of product information from these samples in their territories. The main reason for monitoring was to save money, which otherwise had to be spent on laboratory personnel performing this task. A prepared list with all the clauses of standard EN 1273:2005 chapter 7 'Product Information' had to be filled in by the inspector carrying out the job. Besides the identification of the baby walker itself, the information refers to the marking and the warnings, which are to be found on the baby walker, the attached instruction for use in the language of the country, warnings included in the instruction for use and purchase information concerning the baby walker. The list was designed to be combined with the sample list and it will be discussed in chapter 2.3.4. The chapter 4.2. presents the monitor results.

2.3.4 Sampling

The combined list used for monitoring and sampling has room for two pictures, which the inspector had to take. One picture needed to be taken from a slant angle from above and the latter one from beneath the baby walker frame. The former picture shows the variety present in brands and models of baby walkers (besides the variety of importers who gave them fantasy names). The latter picture presents the variety in constructions for wheeling, braking and parking under the frame construction. The inspectors need both pictures to adequately illustrate and detect the unique differences for selecting a sample to test without doubling it. Choosing the procedure for sampling is described further in chapter 2.4.3. By the means of this procedure, the likelihood of duplicating the test of the same baby walker (with possible different 'names' at a later stage) effectively diminishes.

A disadvantage of the procedure is that another sampling action had to be organised at a later stage, if the coordinator noted duplication in a Member State. Within the given test budget and the agreed programme for sampling, every participant has to deliver a minimum of two samples. The fully contributing participants supplied more samples (three on average), up to a planned 36 samples for the twelve participants. The participants paid and organised the transport of the appointed samples from the participant Member State to the laboratory.

An additional aspect in the sampling procedure is the initiation of a unique recognizable code for each sample to facilitate the procedures from the sampling point via transport to the testing laboratory and all the information exchange between participants, coordinator and test laboratory (see for more information chapter 2.4.3.). The inspector had to fill in a code, which identifies the sample number, Member State, place of sampling and, most likely, the economic operator for placing the sample on the European market. This information could be useful in the case of enforcement actions afterwards as a consequence when eventual bad test results of non-compliances occur. The received total overview of these codes in the used template together with the derived information is given as a result in chapter 4.2.

2.4. Activities Undertaken by the Coordinating Body

2.4.1 Selection of the laboratory

The plan for the Joint Action has foreseen that a number of tests should be undertaken at a laboratory set up for joint testing. The idea was raised in a former Joint Action, which used a single laboratory for all the testing. (This setup has been implemented with success in all PROSAFE's Joint Actions). The potential benefits for the participants are primarily financial, as it should be possible to negotiate better prices when the total volume of tests in the Joint Action is negotiated.

After participants agreed with this principle, they were asked to provide the contact details of as many potential laboratories as possible. The result was that, on the 15th February, the call for tender was sent to seven European laboratories with the deadline set for 15th March 2010. The call mentioned that the selection would be based on eight criteria (experience with the testing of baby walkers and childcare articles, formal qualifications such as accreditation, price, delivery time, terms of delivery, ability to supply additional services to the Joint Action, ability to serve individual Member States with testing of baby walkers outside the Joint Action, and the general impression of the laboratory's ability to undertake the assignment).

Seven out of the seven laboratories (from the Member States DK, PT, CZ, UK, IT, ES, FR) responded by sending quotations in time. The coordinator examined the received quotations and selected the "Instituto Italiano Sicurezza dei Giocattoli" (IISG) to perform the testing. This testing house was one of the least expensive laboratories that were accredited to test using the criteria set out in the EN 17025. It was very experienced and specially accredited in the testing of baby walkers and, in negotiations with the coordinator, it had offered to test not only in sequence and respectively by 'passing' further clause 5.11, 5.12, 5.13 of EN 1273:2005 as described in the call for tender, but to test the entire chapter 5 'Construction'. This was a very attractive offer because of the broader test results, which would lead to more extensive test reports and would better facilitate the participants in assessing and inspecting baby walkers on their domestic market afterwards.

As an additional service, IISG offered participants the opportunity of holding a project meeting at the laboratory address, which could be combined with a visit to the laboratory test equipment for baby walkers and an explanation and demonstration of the relevant items in the standard on the spot. On the 9th April, the Project Leader and the coordinator made a visit to the Italian laboratory to assess present test equipment and the expertise. The institute was found to be able of carrying out tests according to the parameters stipulated by the standard and it was accredited to do so.

An extra advantage was the fact that one of the experts of the laboratory is a member of the WG1 group for baby walkers within the technical committee CEN TC252. He was willing to give useful information to participants with the occasion a future visit. PROSAFE signed the contract with the laboratory on 29th May 2010.

Deliverable D4 from Annex D contains the terms of reference of the call for tender and for testing the laboratory. For the process of assessing and selecting the quotes of the seven laboratories, the overview D5 is used. The negotiated unit price of €380 has been based on 30 to 40 sampled baby walkers delivered to a laboratory address in Italy.

2.4.2 The Monitoring Process

The Grant agreement [1] identifies as a specific objective of the Joint Action: to gain experience with applying the provisions of the standard EN 1273:2005.

During the first and second stage of the project this 'gaining experience by applying the provisions of the standard EN 1273:2005', was highlighted. Participants decided to let the carrying out of the monitoring of EN 1273:2005 Chapter 7 'Product information' on baby walkers be done by their inspectors while they are sampling simultaneously baby walkers for the joint testing in the Laboratory on standard chapter 5 'Construction'. By this decision, taken on the first meeting money could be saved that otherwise would be spent in addition to the laboratory personnel.

For this combination of tasks, the coordinator designed a combined template of two pages, the Monitor & Sample list. Page one with monitor information (please see the figure on next page) and page two for collecting some sample data. Page 2 begins with some explanatory remarks on page one, the monitor page (see below), and continues with the sampling part which is described further in chapter 2.4.3. The coordinator collected all monitor information together with the sample information by e-mail.

Explanatory remarks/instructions on the monitor & sample list:
Square space 1, picture to shoot: JPG picture BW 'slant above',
Square space 2, picture to shoot: JPG picture BW 'frame underneath'.
The monitor list data are obligatory following GPSD & EN 1273:2005 chapter 7, besides two extra's:
Max frame width **: widest measurement in cm (outer side until outer side).
MS code *: market surveillance value; see explanation beneath (=Table 11, chapter 4.3)

Monitor & sample list baby walkers (BW) **MS code *:** .....I.....I.....I.....I

BW model:			
Name or trade mark manufacturer or:			
importer or :			
organisation responsible for sale			
Ref. or serial nr:			
Max. frame width **		cm	
Marking on BW	yes	no	
EN1273:2005			
Warnings on BW	yes	no	
Warning sticker 'never leave the child unattended' &:			
Warning pictogram with same 'meaning'			
Instruction for use	yes	no	
Ifu in nat. language?			
if Ifu in nat.language:	yes	no	
W: 'never leave the child unattended' &:			
'child will be able to reach further and move rapidly in BW'			
Purchase info:	yes	no	
'never leave the child unattended'			
'prevent acces to stairs,steps, uneven surfaces'		-	

2.4.3. The Sampling Process

The coordinator prepared a template for the combined Monitor & Sample list mentioned in 2.4.2 and wrote a procedure on how to deal with it. His intention was to prevent eventual 'double sampling = double testing' of the same baby walkers (seen from the constructive side) out of the huge variety of names, brands, different names for the same model and even different models with a similar name. Just as the baby walkers 'Sunny baby' and 'Funny baby' could easily have the same structural framework, so could the baby walker with a 'motorcar' or an 'airplane' bear close resemblances. Given the fact that the 'falls down steps is estimated to be crucial in banning and recalling procedures in the enforcement stage later on, it is important to optimize the variety in the wheel- and friction plates setting underneath the baby walker framework within the sample programme.

The two pictures taken on page one of the combined Monitor & Sample list gave the coordinator enough relevant information to execute this part of the process resulting in the message to participants: 'Ready for Send off' to the laboratory.

To register the sampled number, the EEA country, the place of manufacturing, the place of sampling related to the economic operator, a so-called MS code was introduced to identify some data (MS for Member State or Market Surveillance). The five characters needed are explained in Chapter 4.3. in connection with the sample results.

2.4.4. The Testing Procedure

The communication with the test laboratory has been organised in advance and in a defined way following the stages in sequence. The coordinator received sample list pages with a "ready to send off" placed on a special prepared "running list". This gave 'in code' the status, starting from the moment: "ready for Send off (S) in the related Member State", "Send off and Received at the laboratory (SR)", "Send off", "Received and Tested (SRT)" and finally "Send off, Received, Tested and Reported (SRTR)". Every new sample has led to a coordinator 'e-mail update' of the 'running list' to participants. The exclusive (set up) communication between laboratory and coordinator used the same system. The participants were requested to not communicate directly with the laboratory. Any lack of communication and/or double communication was prevented by employing this system.

In addition, 'several nature' problems (e.g. transport delays) could be detected in time. The running list is shown below.

'Running list' received monitor & sample lists version xx-- xx-- 2010)

No	MS code	Brand / model name	Already sampled, etc. Yes (Y)	Chosen for sending off to laboratory on signal to give (=S); and at lab received (=SR), tested (=SRT) and reported (=SRTR).
01				
02				
03				
04				
05	3AT31	Rocking Walker	Y	S
06	3AT31	Rocking Walker	Y	SR
07	3AT31	Rocking Walker	Y	SRT
08	3AT31	Rocking Walker	Y	SRTR
09				
10				
11				
12				
-				
-				
-				
36				

2.4.5. Administration of Action

The coordinator applied an excel overview to facilitate the follow up of the financial situation represented by the contribution in time of Member States. Replying on each received timesheet an, through that delivery, updates overview was returned directly. The Individual and total 'statuses in % of the final goal were given to allow comparison of contributions.

2.4.6 The WebEx Document Depository

Under a newly created 'button baby walker' / groups documents at the WebEx PROSAFE homepage, a document depository was set up.

Relevant documents and all meeting documents and reports were uploaded to this depository. The documents are accessible for all participants in the Joint Action and to others with access to the PROSAFE WebEx system.

2.4.7 Synergies with other PROSAFE Activities

The Joint Action was coordinated with the EMARS II project, in particular Task B that works with cross-border material for Joint Actions [12]. In practice, this was done by running a number of training sessions for the consultants and the project leaders. During these sessions PROSAFE's approach to managing Joint Actions was presented and discussed. This included a discussion of organising kick-off meetings, organising the cooperation in the Joint Action as a whole, outreach to stakeholders, executing a call for tenders to test laboratories and research institutes, project administration, etc. This was done to ensure that the 2009 Joint Actions benefited as much as possible from the experiences gained previously by PROSAFE.

To collect best practices and for other feedback from the 2009 Joint Actions, PROSAFE identified a person to follow the Joint Actions and to run the training events. This person participated in some of the 2009 Joint Actions, kick-off meetings and organised regular meetings between the consultants. Furthermore, the consultants could contact him when needed to discuss emerging issues. The input received, via this channel, is used as input to Task B to adjust and fine-tune the procedures for running Joint Actions.

One example where the 2009 Joint Actions has fed back knowledge and best practices into the EMARS II project is this Joint Action. This contributed to the work with improvements and refinement in the call for tender template and the matrix for a laboratory quotes overview (See Annex D: D5).

Another example is a classic checklist, and a so-called check-page, for baby walkers, which customs and inspectors can use in a first stage on the imported or manufactured baby walkers regarding the likelihood of passing/failing on a severe safety requirement in the EN standard for this specific product testing. It tries to address the constraints that custom employees often have with over complicated checklists on the big variety of products that enter the internal market (see the fifth report of the 'Baltic Sea Network 2009' [9]). Hence, the developed check-page followed the 'suggestions' which custom employees introduced in their sixth report of thee 'Baltic Sea Network 2010' [10].

One of the participants (Latvia), member of the Baltic Sea Custom's network is asked to introduce checklist and this special check-page, named 'Baby Walker's Double Check Page' for future enforcement actions on baby walkers. For the checklist and the check-page, please see Annex C: C7 and C8. These tools are sent to EMARS II, Task A and Task D to be included in their work.

The coordinator has collaborated in an intensive way with CEN TC 252 WG1 and exchanged and discussed this year's developments regarding the new US legislation on baby walkers, as worked out by CPSC and came into force December 2010 (see for more information 2.6.3). This is considered as a contribution to EMARS II Task G.

2.5. Dissemination Activities

The Joint Action has undertaken some activities to inform and encourage Member States and stakeholders in- and outside the Joint Action.

2.5.1 Press Releases

After the Kick-off meeting on 25 January 2010, a PROSAFE Newsletter (no. 11) was distributed to announce the start up of the three 2009 Joint Actions Baby walkers, Helmets and Child Appealing Household Appliances (see Annex C: C1). Some participants have used the newsletter in a broader sense e.g. to inform their internal organisation and/or their externals.

Just after the testing stage a first press release was issued by PROSAFE and in all participating Member States. This press release and some examples of national translations are given in Annex C: C2, C3, C4, C5, and C6). At the finalisation of the Joint Action, just after the final meeting 7th December, where enforcement activities were reported by participants, a second press release has been issued (Annex C: C11). The European Child Safety Alliance (ECSA), ANEC and CEN have been informed by means of newsletter and press releases. Moreover, the coordinator had informed them in short reports.

2.5.2. Final Workshop

In November, a half-day workshop was organised in Brussels.

The stakeholders ANEC, ECSA, CEN, the Baby Products Association (UK), the French manufacturer "Dorel", laboratory representatives and the European Commission (DG SANCO) also attended the workshop.

ECSA/ANEC gave a presentation regarding the consumer's point of view on baby walkers; an Austrian Expert from the Graz University and member of the "Safe Kids Austria" organisation presented a study on baby walker accidents over a number of years. Chapter 1.2.2 mentions already some of the accident-data. The Project Leader and Project Coordinator presented the testing and monitoring results and their presentations gave rise to an interesting discussion.

In the second part of the workshop, specific non-conformities and the influence of certain parameters related to them were shared and discussed. Finally a CEN TC252 WG 1 representative gave a first view on the standard revision wich had their start-up meeting the month before.

All presentations from the workshop are available on WebEx.

2.6. Awareness raising Activities

2.6.1 Activities to Stakeholders

The Joint Action has undertaken some activities to enlarge Awareness to Member State Authorities and stakeholders outside the action.

- ECSA and ANEC are both kept informed by relevant agenda items and documents of the meetings. ECSA represents ANEC regarding this subject and the representative received an invitation for the laboratory visit in Cabiate Italy, the final workshop and the final meeting. ECSA is involved in the subject through their position statement on baby walkers sent to the European Commission, which express their regrets regarding baby walker safety. ECSA has highlighted the consumer view on baby walkers in a final workshop presentation.
- DG SANCO of the European Commission was the most important stakeholder for the Joint Action. Therefore, a representative of DG SANCO was invited to participate in every project group meeting and was kept informed by attending all the meetings.
- CEN Technical Committee 252 WG1 on baby walkers (childcare articles) was involved through a personnel expert associated with the chosen test laboratory IISG. The expert, technical director at IISG is, as agreed, directly involved in the Joint Action test and

has given a presentation on the final workshop concerning the standard history and the start-up of a standard revision recently.

- The CEN leader of the programme concerning has visited the first day of the EMARS autumn programme on 16 November in Brussels.
- The Project Leader and the Project Coordinator visited on 17 December 2010, accompanied by the Polish Market Authority, a Polish importer of baby walkers who had delivered non-compliant baby walkers toward two participating Member States.

  Besides enforcement actions as RAPEX notifications (see Annex B) and withdrawals, the visit had the aim of awareness rising to encourage economic operators to operate the safe import of products (see chapter 4.5.2 and visit report Annex D: D10e).

2.6.2. Outreach to China

PROSAFE recognised that products manufactured in China might comprise a significant proportion of the products to be tested within the framework of the Joint Action. Accordingly, some outreach to China was planned as part of the project.

The Grant agreement specifically makes provision for a mission to China and the budget includes provisions for two people to travel to China for a 5-day journey. At the time of drafting the proposal this seemed the most obvious form any outreach might take in respect of which some budget provision needed to be made. The primary purpose of the trip was to present the findings of the Joint Action and the safety requirements for the Chinese authorities and/or manufacturers. The secondary purpose was to gather experiences with surveillance activities in China in cooperation with the Chinese authorities. The agreement does not stipulate any formal deliverables linked to the China activities.

From the beginning, it was planned that these activities should be coordinated with the EC-China activities to benefit from their experiences and contacts. It was considered virtually impossible for PROSAFE to create contacts to the Chinese authorities within the short duration of the Joint Action. Therefore, the Joint Action contacted the European Commission in September to discuss how the outreach to China could be done. A couple of options were discussed and as a first step the PROSAFE Chairman, Mr. Jan Deconinck, presented PROSAFE and its activities during the Shanghai Summit in October 2010.

However, it was also decided that further activities were needed; hence PROSAFE submitted a proposal for a mission to the European Commission in the beginning of November. The proposal foresaw a combined trip to present the results from the Joint Action on Helmets, the Joint Action on Baby walkers and the Joint Action on Lighters in one mission. It was foreseen that the mission would go to several different regions in China where the major manufactures of the three products were located. The Chinese authorities were requested to help identifying these locations. This proposal was discussed and forwarded to the Commission's Chinese counterparts for them to examine whether such a mission could be organised within the few weeks left of 2010. Unfortunately the Chinese authorities replied back in the end of November that it was impossible due to the limited timeframe and the wide scope of the visit so PROSAFE had to consider other means.

The immediate lesson learned is that it takes quite long time – at least some months – to set up a mission to China. PROSAFE's preparations only involve a limited number of people, but the organisation in China is difficult and time-consuming. Typically, such activities would involve several units on the authorities' side. If the activities furthermore include workshops for manufacturers, they must be identified and invited, meeting rooms must be booked, etc. It is foreseeable that the preparations on the Chinese side can well take more than half a year. If the activities moreover are to be linked to scheduled events in the EC-China discussions, more time must be allocated to allow for the necessary synchronisation.

When the cancellation was a reality, PROSAFE decided to apply other means to make available some of the material that would have been presented to the Chinese during the missions as describe below. This material is forwarded to the European Commission so they can present it for their Chinese counterparts to demonstrate what could be put into a European-Chinese cooperation on market surveillance. (The material is translated versions of key deliverables from the Joint Actions on Helmets and Baby walkers; see also chapter 2.6.4). Any future China

strategy (or strategy aimed at other producer nations outside the EU) must consider a holistic approach seeking to communicate the results of the Joint Actions and the experience gained throughout the supply chain. This may certainly well involve visits to the producer nation but the need to undertake action closer to home, for example in collaborating more closely with customs and in addressing retailers and importers in Europe, must not be neglected and should be integrated within the strategy and work plan for PROSAFE's activities. The visit to the Polish importer (see 2.6.1) could serve as an example.

PROSAFE plans to carry out a study visit in 2011 as part of the Joint Action 2010 and the Joint Action on Lighters. This mission is envisaged to include workshops or training sessions for manufacturers and meetings with export authorities to discuss the result from the 2009 Joint Actions as well as preliminary findings and observations from the 2010 Joint Action. Thus, the results from the baby walkers' action and the helmets action will be addressed. This reflects how PROSAFE wants to co-ordinate the China activities across all the different Joint Actions into a coherent strategy. In practice, it means that any relevant issue from any Joint Action will be addressed whenever PROSAFE is in contact with the Chinese authorities or manufacturers. This must of course be coordinated with the European Commission's activities and activities carried out by individual Member States to maximise any arising synergies.

2.6.3. US Developments on Standards

The US CPSC (Consumer Product Safety Commission) gave the comparable current voluntary ASTM F 977-07 baby walker standard, after an improvement project that ended on 26 May 2010, a legal status [4] by implementation in 'the US Consumer Safety Product Improvement Act (CSPIA) under section 104(b)'.

These recent US developments (the 'final rule') have been discussed in relation to the European EN 1273:2005 at, and in connection with the 30 June meeting at IISG in Cabiate. At expert level, the Project Leader, the Coordinator and Technical Director of IISG, Dr. Matteo Longoni, WG1 member of Technical Committee TC252, tackled the likelihood of the necessity to make suggestions for the revision of the EN 1273. WG1 is responsible for the state of the art concerning EN 1273:2005.

The improvements of the American standard, within the 'new rule making', came into force in December 2010. The Joint Action results could deliver relevant input to WG1, 'Child use and Care Articles'. Amongst several modifications in ASTM F 977-07, the specific one with supposed direct influence on clause 5.12 (prevention of falls down steps) in EN1273 is considered important. Some concerns are expressed regarding the fact that the three tests related to that clause (facing forward-, sideward- and rearward tests) are based on fixed launching distances belonging to fixed baby walker masses of 3,6 kg (8 pound).

The masses of baby walkers, which are currently on the market, may easily exceed such a fixed mass and should be tested at an increased launching distance. Otherwise, they would pass the current tests too easily. Heavier baby walkers do not obtain the required critical step edge velocity of 1,21 m/s (4ft/s), on which amount the test is based. An infant is supposed to reach that velocity by self-propelling the baby walker. This velocity is based on Austrian studies and experiences carried out in 2000 under the mandate of the European Commission [11].

The coordinator presented his velocity and launching distance calculations for a range of masses. The calculations, already adapted to the EN standard situation, are based on the formula introduced in the American new 'final rule' as an application of the 'principle of work and energy' from dynamics in mechanics theory. Both calculations (v and d) can be found in Annex D: D6c and D6d.

The Laboratory was requested on 30 June 2010 to compare the American Standard and the European Standard on clause 5.12 in the old version and in the new version of calculated launching distances for two of the heaviest baby walkers (4,5 and 7 kg) among the collected samples. It is also noted that 'not obtaining' the critical step edge velocity at the collision stop in clause 5.13 has comparable consequences on the two related dynamic stability tests, caused by the influence of the square of the velocity in collision and/or turning over energy.

Studying the American 'final rule' proposals and the decision of the Consumer Product Safety Commission (CPSC), one may remarkably observe the trials to arrive at a global harmonisation. EN 1273:2005 clause 5.15 regarding the test of the (non-obligatory) parking device is adopted by CPSC as a useful extra clause. For adoption of the European clause 5.11 'Static stability' however, no support was found on US-manufacturer's side. The Commission's representative of DG Sanco, present at the IISG visit on 30th June, in Cabiate, supported this exchange of standardisers strongly.

The coordinator presented and handed over the Joint Action-document 'Considerations for further analysis on EN 1273:2005 [7]' at the TC 252 WG1 start-up meeting for the standard revision, which took place on 19th October 2010 in Amsterdam.

2.6.4. Other Awareness Activities

At the final meeting a check-page 'Baby walker's double check' and a 'usual checklist' were appointed which could support, in an easy way, customs and inspectors in future enforcement activities in either stopping non-conforming baby walkers to pass through the internal market (see also 2.4.7) or to withdrawal them from the market if found at an economic operator. The checklist (see Annex C: C7) gives in brief the content of clause 5 of standard EN 1273:2005.

Moreover, the 'Baby Walker's double check' -page is specific developed for and restricted to the most essential safety requirement to be fulfilled, and can be used for a quick first 'selecting view' in advance of further investigation (see Annex C: C8). Both, check-page and check-list are also intended to be handed over to the Chinese Authority for Quality, Supervision, Inspection and Quarantine (AQSIQ) charged with the quality of product export in China and will be included in a horizontal document in PROSAFE's next year programme (see chapter 2.6.2 'outreach to China'). In advance checklist and check-page are translated into Chinese (see Annex C: C9 and C10).

2.7. Difference between Work Programme and Activities Actually Undertaken

Table 5 and 6 below compares the activities foreseen in the work programme as stated in the Grant Agreement [1] to those actually undertaken in the Joint Action:

Planned Activity	**Activity Actually Undertaken**
By the participating Member States	
Participate in kick off meeting	Kick off meeting, Brussels, 27 January '10. Please also see chapter 2.2.1 and Annex D the deliverable D1a,b
Check BW in the market	Czech Republic and Sweden delivered recent and thoroughly based market surveillance reports. Sweden dealt with the EN 1273 testing. Other Member States, but not all of them, had restricted activities on market surveillance on baby walkers. Please also see chapter 2.3.1.
Possible check border of consignments with BW	No planned activities in this field have taken place. The Baltic Sea Market Surveillance Authority Network has not yet considered BW as a 'sensible' product which is worthy of attention at the borders. Please see chapter 2.3.1.
Participate in 3 project meetings	First project meeting, Brussels, 25th February '10, Second project meeting, Cabiate, 30th June '10, Third project meeting, Brussels, 16th September '10, An extra final meeting, Malta, 7th December '10, was organised to finish properly the project. Please also see chapter 2.2.1 and Annex D the deliverables D2a, b, D6a, b, D9a, b and D10c,d.
BW in retail stores and wholesalers, importers and manufacturers, possibly including inspections of consignments with BW at the border	Inspectors combined monitor and sampling activities to prepare for joint testing in the planned months March, April and May with another run in June '10. Place of sampling and the likely responsible economic operators are registered in relation to eventual enforcement actions in the third stage. Please also see 2.3.3 and 2.3.4.

Laboratory testing of BW	In total 36 samples are taken and 36 laboratory tests are carried out in the planned months April, May and June. Also in July '010 some samples are taken and remaining tests executed. Two special 'mass effects' tests are carried out. Please also see chapter 4.4 and Annex D: the deliverable D8b and D8c.
Exchange of information on tested samples and results	Exchange of information on tested samples and results has happened in the 2nd and 3rd project meeting and to stakeholders in the final workshop. Results are also available for Member States on WebEx. Please also see chapter 2.2.1 and Annex D: deliverables D8b and D10a.

Table 5: Overview of activities by the Member States foreseen in the working programme and activities actually carried out.

Planned Activity	**Activity Actually Undertaken**
By the Coordinator	
Organise, prepare and participate in kick off meeting	Brussels, 25 January '010, Please also see chapters 2.2.1 And Annex D: deliverable D1a,b.
Facilitate discussion of a common sample scheme	Discussion is facilitated in advance (kick-off meeting) by a document 'sampling and testing' written by the coordinator. Please also see chapter 2.2.1 and 2.4.3 en 2.4.4.
Install and operate suitable means and procedures for exchange of information on baby walkers	The coordinator drafted, discussed and installed several procedures and lists to facilitate the monitoring, sampling and testing procedures and the information exchange. Please also see chapter 2.4.2, 2.4.3 and 2.4.4.
Study feasibility of baby walker. If feasible install procedure for joint testing	Join testing proved feasible in earlier Joint Actions, which the participants agreed with. A procedure is drafted. Please also see chapter 2.2.1 and 2.4.4.
Answer questions on coordinating issues	The coordinator answered questions and solved coordinating issues at the meetings or by e-mail exchange, in the days between the meetings.
Organise, prepare and participate in 2 meetings	Two project meetings were organised on 25th February, in Brussels, and on 30th June 2010, in Cabiate Italy. Please also see chapter 2.2.1 and the deliverables D2a,b and D6a,b in Annex D.
Update procedures inventories and forms	The coordinator has drafted during the action the following documents, amongst others,: • Implementation plan (Gantt chart) for Joint Action BW, • Monitor and sample list baby walkers, • Monitoring, sampling and testing procedures Joint Action baby walkers, • Running list baby walkers, • Results sampling form, • Results monitoring form sampled baby walkers, • Listing test results sampled baby walkers.
Operate means of exchange of information on tested baby walkers	Procedures and lists were made operational by the coordinator, to facilitate exchange and update of the monitoring-, sampling and test information. Please also see chapter s 2.4.2, 2.4.3 and 2.4.4.
Prepare interim implementation report	The interim implementation report from the Joint Action on baby walkers was issued in August 2010.
Organise, prepare and participate in 1 meeting	The meeting was organised on 16th September in Brussels. Please see also chapter 2.2.1 and D 9a, b in Annex D.
Prepare final report	The coordinator finished writing this Final Implementation Report on 31st December and published it in January 2011.
Organise, prepare and participate in the final workshop	The final workshop was organised in Brussels on 15th November 2010. Please see also chapter 2.2.1 and D10a,b in Annex D.

Table 6: Overview of activities by the coordinator foreseen in the working programme and activities actually carried out.

Extra Activities not foreseen in the Original Work Programme	
Activity	**Detailed description**
Outreach to CEN	The Joint Action reached out to CEN and in particular to the IISG expert in the WG1 working group under TC252. The activities include: • The improved voluntary American standard ASTM F 977-07, original base of the EN 1273:2005, has received a legal status within the Consumer Product Safety Improvement Act Section 104(b) and , will come into force in December 2010. During the third meeting on 30th June 2010, in Cabiate, (see 2.2.1) and at the CEN meeting, in Amsterdam, (see 2.6.3) it is recommended to the CEN working group to follow up in the standard-revision those improvements on several important items. • After the meeting on 30th June, the coordinator gave a presentation to the WG1 expert regarding calculations and their possible effects in a future revision of EN 1273:2005. The calculations (for critical step point velocity, collision velocity and launching distances) give test setting corrections needed for baby walkers with a different mass than the recent fixed 3,6 kg. (Annex D: deliverable D6c, d). For the two heaviest baby walkers in the sample collection, the Joint Action requested the IISG to compare the European and American standard in the recent and revised test settings. The respective results and reports have been made available in the third stage of the Joint Action (see Annex D: D8c). • Results of the comparison under the last bullet and considerations for further analysis on EN 1273:2005 are presented by the coordinator to CEN TC 252 WG1, charged with the revision of this standard at their start up meeting in Amsterdam (see 2,6,3).
Finalising project meeting	• An extra final project meeting is organised on 7th December in Malta. The purpose is to finalize administrative issues carefully and to discuss enforcement country reports from participants and this Final Implementation Report. At the meeting a final press release was requested and issued to stakeholders (see Annex D: D10c, d).
EU Importer visit	• On 17th December, an outreach, by means of a company visit of the Project Leader and the Project Coordinator, accompanied by the Polish Market Authority, to a Polish importer, who brought in non-compliant Chinese baby walkers. These were distributed to the participant Member States, Malta and Germany, who sampled them for the Joint Action in their territories. The visit had an informational character on import responsibilities within the EEA (see chapter 4.5.2 and Annex D: D10e).

Table 7: Overview of extra activities not foreseen in the working programme and activities actually carried out.

3 Results of the Joint Action

3.1. Introduction

The combined gained experience of monitoring, sampling and test results appeared to be highly applicable in the third stage where enforcement actions, coupled with the chain of economic operators are carried out. The results will also give a more extended view regarding the safety of baby walkers and the quality of their marking and warnings on the recent market.

3.2 Results Monitoring by Participants

Inspectors have sampled 36 baby walker samples in their territories. However, only 33 baby walkers appeared monitored at arrival at the test laboratory. The monitor information regarded all the clauses of standard EN1273:2005 chapter 7 'Product information' and is listed in page one of the monitor & sample list template as illustrated in chapter 2.4.2 and 2.4.3. The same list is used to present the build up output from participant's monitor results. Please see Annex D: deliverable D8a and table 10 below.

Marking on BW	*Yes*	*%*	*No*	*%*	*Clause*
EN1273:2005	27	82	6	18	7.2
Warnings on BW	***Yes***		***No***		
Warning sticker 'never leave the child unattended' &:	27	82	6	18	7.2
Warning pictogram with same 'meaning'	10	30	23	70	7.2
Instruction for use (IFU)	Yes	%	No	%	
IFU in nat. language?	26	78	7	22	7.1
IFU in nat. language (26 =100%):	Yes	%	No	%	
W: 'never leave the child unattended' &	26	100	0	0	7.4
'child will be able to advance and move rapidly in BW' etc.	22	85	4	15	7.4
Purchase info:	***Yes***	***%***	***No***	***%***	
'never leave the child unattended' &	25	76	8	24	7.3.2
'prevent access to stairs, steps, uneven surfaces'	21	64	12	36	7.3.2
Found Range in max. BW width:	57 - 69 cm				

Table 10: monitor results on 33 baby walker samples.

Remark: Yes = compliant; No = not compliant

Conclusions:

1. The marking 'EN 1273:2005 and the warning sticker 'never leave the child unattended' is found on 82% of the baby walkers. This high marking percentage for the EN standard does not match however with the much lower standard compliance percentage found in the laboratory test of the samples (53 % comply; see chapter 4.4).
2. If the instruction for use is found in the national language of the country of sale, (78%) the compliant score for presence of the warnings: 'never leave the child unattended' and the child's ability to be able to 'reach further and move rapidly when in the baby walker' is rather high with 100% and 85%, respectively.
3. The maximum frame width of baby walkers is monitored, in addition, to verify that within the range measured of 57-69 cm, a common baby walker can easily pass through a US standard doorway (= 36" or 91,4 cm; one of the US criteria for a recall).
   N.B: In Europe, standard doorways vary between 85 and 90 cm.

3.3 Results Sampling by Participants

Inspectors sampled in their territories 36 baby walkers. The coordinator refused some samples, as he was concerned that they might be duplicating the samples collected from other Member States. To register the sampled number, the EEA country, the place of manufacturing, the place of sampling related to the economic operator, and a so-called MS code is introduced to identify some data. (MS for Member State or Market Surveillance). The sample list is listed as page two of the 'Monitor & Sample list template' (chapter 2.4.3) and asks for the filling in of five characters needed to define the MS code. The rows below build up, in sequence, relate for the number, country, manufacturer origin and place of sampling:

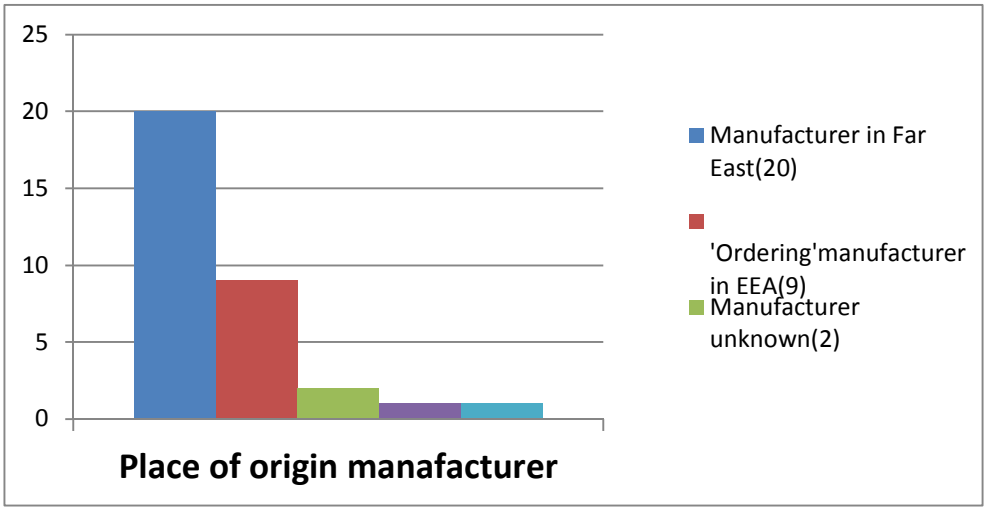
1	The sample number; participants should sample an average of 3 samples.	
1GR	Sampling participant e.g. Greece	
1NL0	0 means : manufacture in own country 1: manufacturer in other EEA country 2: 'ordering manufacturer** ' in EEA country 3: Far East manufacturer, 4: Other manufacturer outside EEA, 5: Manufacturer unknown.	01 01 09 20 -- 2
1LT34	0 means: sampled at 'own country manufacturer' (made in) 1: sampled at own importer=EU importer (for several MSs) 2: sampled at own importer=an EU distributor(in LT) 3: sampled at wholesaler/distributor 4: sampled at retailer/distributor 5: sampled at 1,2,3,4 but internet ordered from EEA 6: sampled at 1,2,3,4 but internet ordered from Far East 7: sampled at 1,2,3,4 but internet ordered from elsewhere	01 10 09 02 10 01 -- --

Table 11. The explanation of the used MS code to select the 33 samples,

*** An ordering manufacture is defined as an economic operator in EEA, who has decided to let manufacture the baby walkers outside of the EEA.*

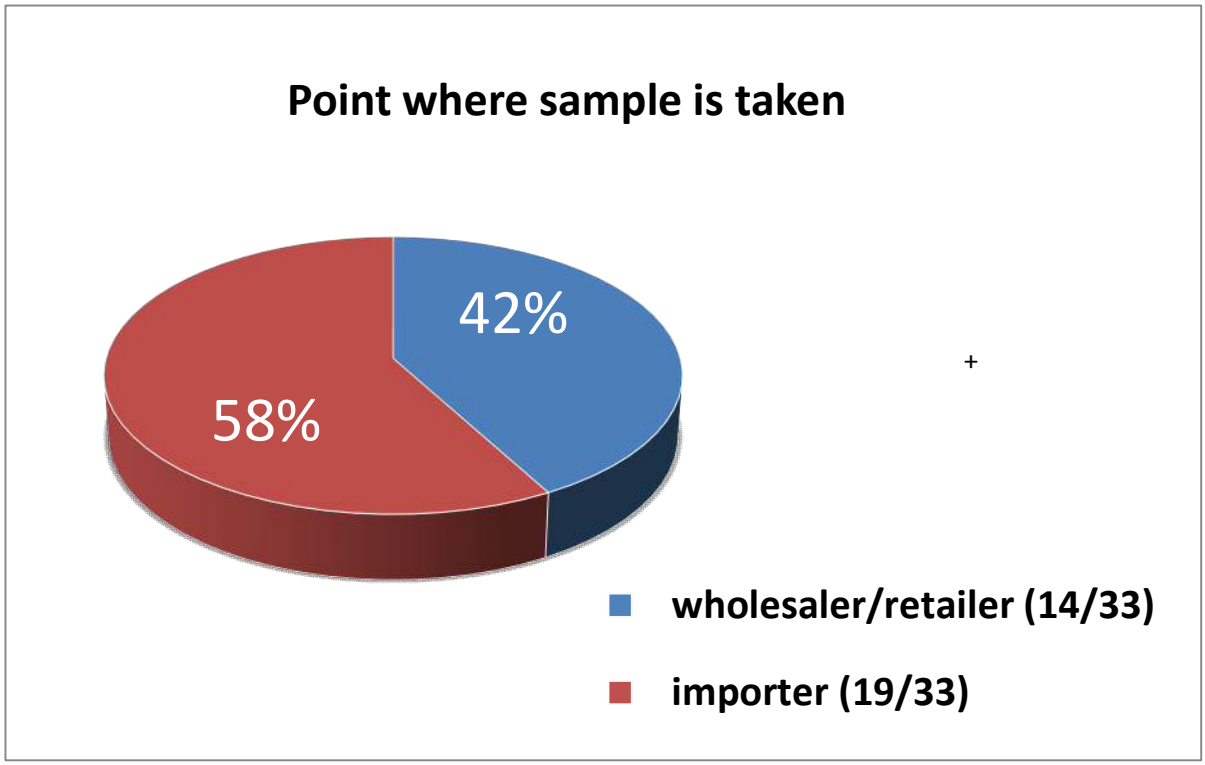
The MS code has been successfully proved in facilitating the communication between participants, the coordinator and the test laboratory and can be found as a simple identification of the baby walker concerned in obtained results such as test reports or results tables. It also gives an overview on the origin in the chain of economic operators or the place where it has been sampled.

In the right hand column of the Table 11, one can read the frequency of filling in by the sampling inspector. From sampling distribution in that column the following can be derived, visualized in the graphic below:



Twenty out of thirty-three (61%) of the samples had the Far East as manufacturing origin. 9/33 (=31%) samples come from 'ordering' manufacturers which mean: manufacturers or importers who ordered the manufacture of baby walkers most likely in the Far East.

Manufacturing in the same country were the product is sold or in another member state are monitored both 3%. When 'categories unknown' and 'ordering manufacturers' are considered most likely to have come from the Far East, the 'Far East share' in manufacturing the sampled baby walkers will come up to 94%. 58% (19/33) of the baby walkers are sampled at 'the importer'; 42% (14/33) at the 'wholesaler' and the 'retailer'.



3.4 Results of Testing by the Laboratory

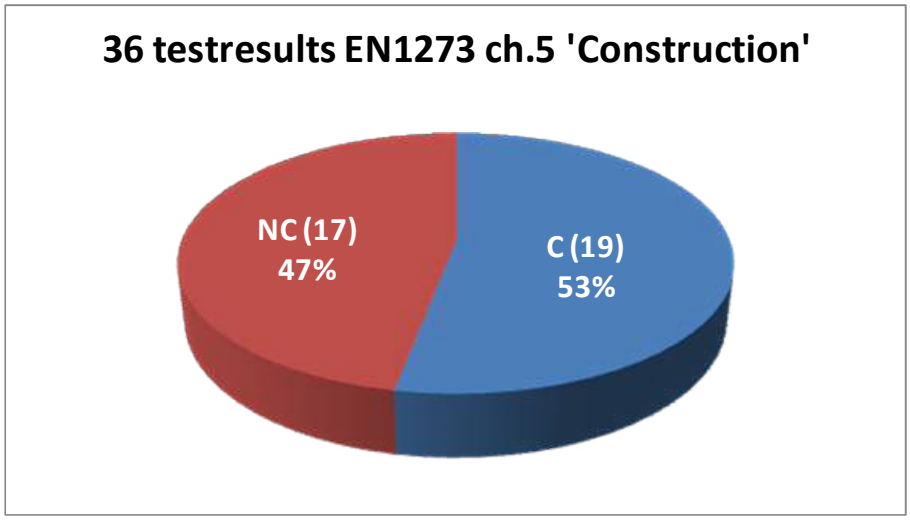
The laboratory IISG in Cabiate, Italy, tested 36 received samples for all the clauses of the standard EN1273:2005, Chapter 5.

The laboratory produced test reports, signed and sent them in a hard copy version to the relevant Member States, and in an electronic version to the coordinator. At the second meeting at IISG, on 30th June participants were able to obtain any explanation concerning their tested samples. A WG1 Expert, member of the staff, presented the results in a power point presentation and extensively explained them. The coordinator collated the results in a common test results 'overview table' that is given in Annex D delivery D8b.

The left column shows Complying (C) or Not Complying (NC) with chapter 5 of the standard. The same abbreviation C/NC is used in column C-N for clause 5.12 'Prevention of falls down steps' to stress on this severe non-compliant clause. In the column, on the right, the abbreviations C (China), T(Taiwan), F(Far East) or E(Europe) are used for the country of origin where the baby walkers 'de facto' are made. On the right-hand side of the table some characteristics of the baby walkers are also given, such as:

M Total mass of the baby walker [kg],
W (Maximum) Width of the baby walker [mm],
L (Maximum) Length of the baby walker [mm],
Y Distance at the tray top edge [mm]; see standard 6.6.3.1.

The 'Overview table 12' presents in detail the test results of chapter 5. The picture below collects all of them in 'one view'.



Nineteen out of thirty-six samples complied (53%), seventeenth did not (47%), regarding the complete chapter 5, EN 1273:2005 'Construction of baby walkers'.

Regarding the thirty-six tested samples, one may read the numbers and percentages of the found non-compliances relating to the different clauses from EN 1273:2005 in table 12:

5.2	OPENINGS	7	19 %
5.3	EDGES, CORNERS, PROJECTIONS	2	6 %
5.4	SMALL PARTS	4	11 %
5.7	RIGID MOVING PARTS	3	8 %
5.8.1	SEAT/CROTCH STRAP	1	3 %
5.8.3	SEAT HEIGHT	5	14 %
5.9	PERFORMANCE	2	6 %
5.10	FOLDING AND ADJUSTMENTS	5	14 %
5.12	**PREVENTION OF FALLS DOWN STEPS**	**15**	**42 %**
5.14.1	STATIC STRENGHT	1	3 %
5.14.2	DYNAMIC STRENGHT	1	3 %
5.16	DURABILITY DECALS AND MARKING	6	17 %

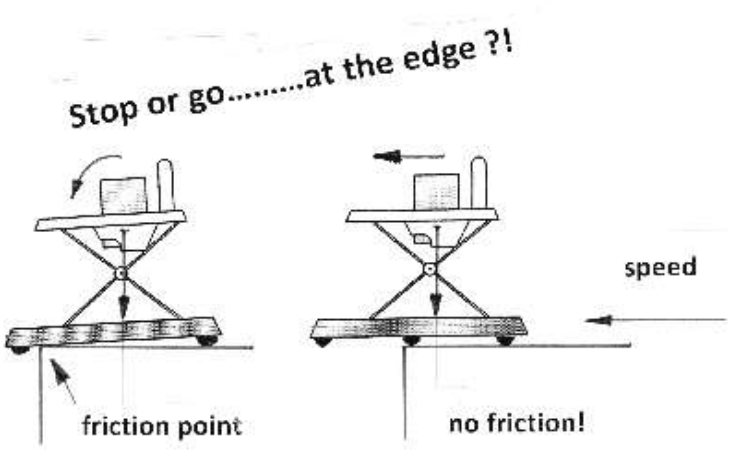
Table 12: Number and percentages of non-compliances found in the 36 samples

In the overview table of Annex D: D8b, one may find the non-conformities (as given in table 12) under the abbreviation (X), in various columns. For a complete description of these test items please see the standard EN 1273:2005 [2]. The most frequent non-compliance found in this project (42%) for clause 5.12 'Prevention of falls down steps' seems to correlate heavily with the most serious product-related hazard encountered by baby walkers: 'the fall downstairs'. The restriction in testing chapter 5 of the standard, seems to be a wise decision but was not selected as the first choice for financial reasons. The Swedish study [8] focussed fully on the 'hazardous' clause 5.12.

A fall down stairs is a hazardous accident with likely injuries as scull fracture, brain concussion and severe head contusions.

Clause 5.12 ‘Prevention of falls down steps’ refers to the so called ‘step fall tests’ for forward(F), sideward(S) and rearward(R) in 6.6 of the standard for each of the ‘step fall’ and ‘tip over’ stages in sequence. As previous mentioned, the comparable information concerning the test results of all tested samples, including the twelve different ‘non-compliances’ from table 12 above, can be found in the overview Annex D: delivery table D8b.

There is however a need for a more specific explanation and analysis of the important clause 5.12 given beneath. The picture of the test table below illustrates what, ‘after propulsion along a certain distance’, can happen with the baby walker: whether ‘stop at the edge of the test table to meet clause 5.12 or, go at the edge (and fall down steps/-stairs)!

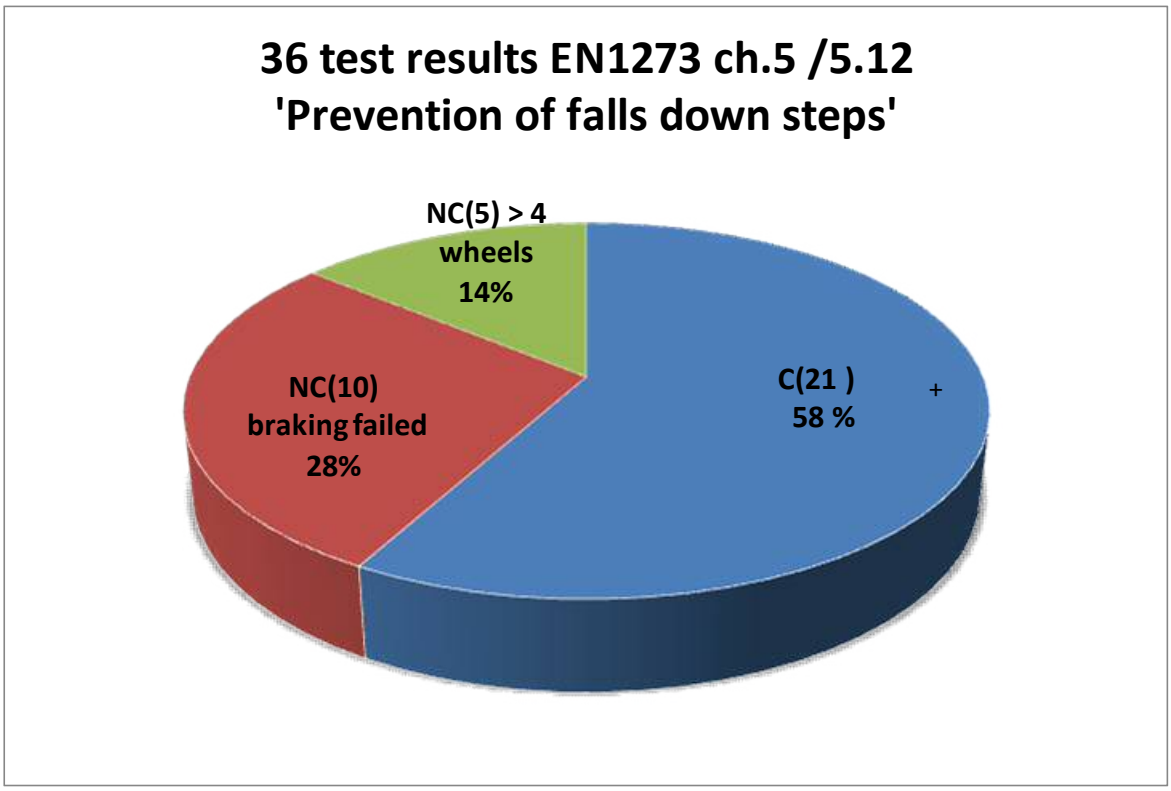


- In all the columns 5.12 F, 5.12 S, 5.12 R, where a blanc’ is seen it means that the baby walker, propelled to the edge of the test table, has stopped in forward, sideward and rearward direction due to the perfect functioning of the braking devices(design) underneath the baby walker frame. This is the case for the sample with the numbers 2, 3, 4, 5, 7, 9, 14, 15, 17, 18, 19, 21, 23, 29, 31, 33, 34, 35 and 36.

- The perfect stopping at the edge of the test table is also the case for the sample numbers 8 and 16, under the abbreviation (+) in the 5.12 F, 5.12 S, 5.12 R columns, however, there could not be attained an overall compliance (C)to chapter 5, due to failing on other (minor) test items (abbreviations X).
- In all the columns 5.12 F, 5.12 S, 5.12 R, where there is the abbreviation (--), the baby walker, propelled to the edge, failed to stop at the edge of the test table in forward-, sideward- and rearward directions due to an overall non-functioning of the braking devices under the baby walker frame (in three directions). This applies to the samples with the numbers 6, 22 and 26.
- In all the columns 5.12 F, 5.12 S, 5.12 R, where one can see a combination of the abbreviations (--) and (+), the baby walker, when propelled to the edge of the test table, failed to stop in one or two of the forward-, sideward- or rearward directions. The cause is the non-functioning of the braking devices, under the baby walker frame in one or two of these directions. This applies to samples with the numbers 11, 12, 20, 24, 25, 30 and 32.
- For the numbers 1,10,13,27 and 28 the abbreviation (--OO) is used in all 5.12 columns. These baby walkers failed in all 5.12 tests, they did not stop or brake at the edge of the test table. They shoot over the edge of the test table and fell to the floor. This result is not impressive; apparently, the manufacturer did not design the baby walker to stop at the edge at all. Braking devices are even missing on these samples. It is also remarkable that all these baby walkers have more than the usual four (castored- or normal) wheels, probably with the goal to strengthen the support of the rather weak frames. However, by mounting these extra wheels 'braking' becomes impossible because the frame cannot sink any longer towards the test table level at the edge (please see the picture on page before). For the given sample numbers the number of wheels and wheel position has been detected as follows for (front, rear, between):

Nr	NS code	Wheel position	Number of wheels/castors
1	1AT	(2,2,2)	6
10	1DE	(2,2,4)	8
13	4DE	(2,2,4)	8
27	8LV	(2,2,4)	8
28	1MT	(3,3,2)	8

- From the above found results, one can derive an important statement: baby walkers with more than four wheels (castored/normal) and/or no braking devices underneath the baby walker will give a strong indication for failing at the essential standard clause 5.12 'Prevention of falls down steps'. This statement is worked out in a 'Baby Walkers double check page' intended for use by inspectors and customs in future market surveillance projects (see chapter 2.5.1) and Annex C: C8).



Twenty-one out of thirty-six samples complied (58 %), fourteen did not (42%), with reference to clause 5.12.

- Finally, the 36 test results on clause 5.12 will provide a worthwhile data set regarding all parameters, which could influence the result and, in an indirect way, provide a safer design baby walker. This data set is made available to CEN TC252 WG1 for supporting their process of standard improvement that began end of 2010. The dataset in excel (see Annex D: D8d) also allows for a sensitivity analysis on these given parameters.

3.5 Results of Enforcement Activities

3.5.1. Enforcement Activities in Member States

Primary goal of the Joint Action is to ensure that baby walkers on the market will be safe.

Within the limited number of budgeted days, which remained after the sampling, and the testing stages of the Joint Action, participating Member States began with enforcement activities supported by and in line with results of the joint testing reports, which became available to the Member States. By uploading all sample- and test reports on WebEx by the coordinator, all participants could become aware of possible 'cross border' activities of EU importers and/or distributors within the internal market (the chain of economic operators). Regarding the construction of the baby walker, (standard requirements chapter 5) three categories could be recognized:

1. Operators who have put baby walkers on the market which fully met those requirements (19 out of 36 (=53%),
2. Operators who have put baby walkers on the market which did not fully met those requirements (2 out of 36 (=5%),
3. Operators who have put baby walkers on the market which did not met the one of those requirements which is supposed to be essential for preventing serious accidents, namely, passing all six stages of the step fall test, clause 5.12 'Prevention of falls down stairs' of the standard(15 out of 36(= 42 %).

For participating Market Authorities this has led to the following categories of activities:

Ad.1. Operators (19) which have been informed as regards passing the tests; Authorities delivered a copy of the test report on request,

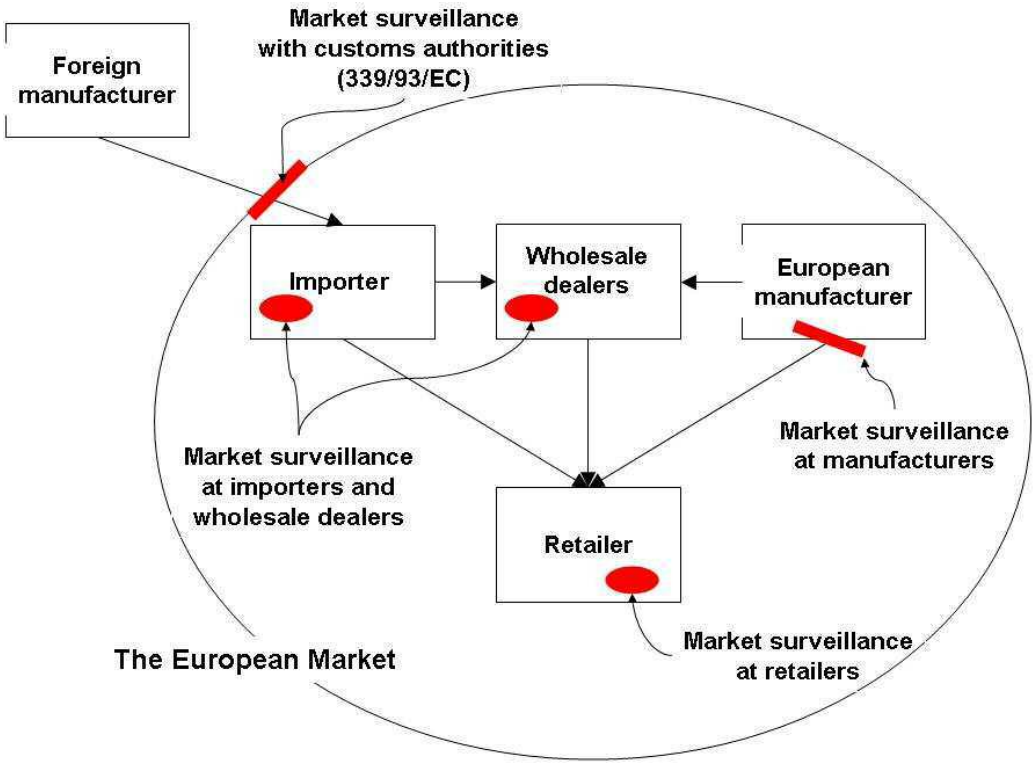
Ad.2. Operators (2) which have received written warnings concerning the non-compliance of items in order to take the necessary measurements for voluntary compliance. Authorities checked realisation. If it appears that it is not possible to reach standard quality, there was an obligatory cessation of selling,

Ad.3. Operators (15) which either voluntary have withdrawn the non-complying baby walker brand/model from the market, including the recall of those products and informing distributors/the consumers concerned, or were compelled to do so under the pressure of the local Market Surveillance Authority.

It is clear that the third category has made the most impact on economic operator, as well as on Market Surveillance Authorities. For economic operators it means a loss of products and turnover; for Market Surveillance it means the start of a careful procedure with risk assessments (please see begin Annex B for an example of 'Risk assessment' developed by one of the RAPEX teams) followed by the RAPEX notifications based on the outcome on 'severe injuries'. Ten RAPEX notifications came out of this category; these RAPEX notifications are published public by DG SANCO and can be found further on in Annex B of this report.

They correspond with to the MS codes 1AT, 3CY, 1DE, 3DE, 4DE, 4GR, 6GR, 4LV, 8LV, 1MT in the test results table Annex D:D8b and are marked in column 5.12 C-N as NR (abbreviation for Not complying and RAPEX notified). The remaining 5 out of the 15 of this third category were special cases:

Three importers (upon samples 1NL, 2LT, 3LT) stated that they fulfilled the obligations placed on them by the Authorities, because of the accompanied test reports of test laboratory Intertek in Shanghai for two of them(1NL, 2LT) and of a France test laboratory "Laboratoire Pourquerey Analyses Industrielles" for the third(3LT). It would deliver them a 'pass' on clause 5.12. However, both related authorities concluded that the identification of the baby walker brand/model, as said, was insufficient criteria for reliable recognition. The Dutch importer wants to verify this point of view but has, never the less, withdrawn voluntary all 300 baby walkers from the market .The Lithuanian distributor of (2LT) however, objected and a legal court procedure could results as a consequence. The importer of tested sample (3LT) is still in discussion about the used test methods and test features. For the remaining two other samples (2DE,1PT) which did not met clause 5.12, enforcement procedures have not yet been completed to date. Most probably, it will lead to two extra RAPEX notifications published in the first weeks of January 2011.



Enforcement entrances in the chain of economic operators

3.5.2. Cross-Border Enforcement Activities between Member States

From the collected information of the 36 sample lists, it has become apparent to Market Surveillance authorities that some EU importers delivered baby walker brands/models to distributors in different Member States. Also questions and remarks from EU importers and distributors, which discussed matters with their local authority led to that information being produced. Apparently, due to RAPEX notifications such important information became widely available cross-border. The Joint Action offered a platform to exchange addresses of relevant economic operators. Some Member States used the ICSMS system to alert other Member States for non-complying baby walker brands/models including the 'cross-border' addresses of related economic operators. This is important in the case of Member States, which do not participate in the Joint Action. However, not all Member States have been connected to ICSMS. Two specific tested samples found in Germany (1DE) and Malta (1MT) led to the same EU importer in 'not connected 'Poland'.

At the final meeting on 7 December 2010 in Malta, we decided to visit, as a single special case, the Polish EU importer accompanied by the Polish Market Surveillance authority to assess measures and import procedures taken on the said baby walker brands. Contacts were made via contact persons known from earlier PROSAFE Joint Actions. The visit at the company, named ALEXIS, in Piastow (near Warsaw) took place on17 December 2010.

Minutes of the visit can be found in Annex D: D10e. Results from this visit in short:

- Before this Joint Action, ALEXIS did not have knowledge of specific regulations on baby walkers, neither regarding the existence of the GPSD. As a trading company in toys and baby articles the knowledge has been concentrated on the Toys directive and related standards,
- All baby walkers of the non compliant brands are withdrawn from the internal market,
- In China previously ordered non-compliant baby walker brands have been cancelled and replaced by orders for compliant items, to be delivered under the condition that they pass a designated European test laboratory. At this time, such a sample is undergoing testing in the Polish Centre for Testing and Certification at Warsaw,

- Via the director of the import company, a member of the Polish Association of Toys and Baby Products, this Association will be informed regarding regulations upon baby walkers and the measures taken. The Association is said to have an informing role regarding relevant regulations such as GPSD, Toys Directive, RAPEX and relevant standards. RAPEX week reports were said to be discussed within the Association.
- The Polish Market Surveillance Authority will follow the developments of the importer. The coordinator will e-mail for information to the ICSMS documents upon sample(1DE) to the authority and the IISG test reports of tested samples(1DE) and (1MT) to the importer. The importer stated that the visit had been very useful to him and a good reason to adopt a new 'mindset' on safe baby products.

3.6 Analysis of Results – Lessons Learned

3.6.1. Technical Analysis

The expected primary objective of the Joint Action has been to ensure that baby walkers placed on the EU market are safe and carry the appropriate warnings and instructions. Within the restricted budget for testing and the allocated number of working days for monitoring, sampling and enforcement, 36 different brands/models of baby walkers were sampled at economic operators in the 12 participating Member States. Ten out of them proved to be non-compliant on a main feature that dealt with preventing 'falls down stairs', the credible most hazardous accident. These well- defined baby walkers were withdrawn from the market and recalls have taken place. RAPEX notifications have been issued for all of them and these are intended to mobilise all Member States to take suitable enforcement actions as done in the participating Member States.A first press release after testing and a second after finishing of the Joint Action have certainly increased the awareness of the risks connected to the use of non-complying baby walkers. Regarding bearing warnings as well as the obligatory marking EN 1273: 2005, a high percentage complied (82%), however for marking it, this did not match to the found lower percentage (53%)of complying in test results EN 1273:2005 (see chapter 4.2).

- The expected secondary objective of the Joint Action was to gain experience with applying the provisions of the standard EN 1273:2005 and assessing the level of compliance found in the market place. By monitoring chapter 7 'Product information' by the inspectors during sampling , guided by a monitor- and sample list, awareness of the product requirements in terms of warnings, marking and suitable instructions for use has been developed. The successful combination of a project meeting with a visit to the laboratory of joint testing has delivered to participants a good view on and comprehension of the standard clauses and the related test features. The presence of a WG 1 member in the laboratory staff has provided the answers on questions raised. Relevant data and considerations regarding the results of the joint testing could even be handed over to the CEN TC252 WG1 in charge of an improvement of EN 1273:2005. Within the sampled scale the level of compliance, related to the different clauses and as a whole, has been described extensively in chapter 4.
- The general objective of the Joint Action has been to achieve a higher level of coordination between market surveillance authorities involved in this project. The successful joint testing was an important step because it enabled to increase the levels of awareness and compliance in a planned same period. It facilitates, in an easy way, the exchange of 'same formatted' test information on baby walker brands/models found on the market. Several tools have been developed to support the joint action successful and even a checklist and 'double check-page have been developed during the Joint Action to assist inspectors and custom employees in future inspections.
- The immediate lesson learned from the cancelled plan to visit Chinese authorities and manufacturers (see 2.6.2) is that it takes quite long time – at least some months – to set up a mission to China. PROSAFE's preparations only involve a limited number of people, but the organisation in China is difficult and time-consuming. Typically such activities would involve several units on the authorities' side. If the activities furthermore include workshops for manufacturers, these must be identified and invited, meeting rooms must be organised, etc. It is foreseeable that the preparations on the Chinese side can well take more than half a year. If the activities moreover are

to be linked to scheduled events in the EC-China discussions, more time must be allocated to allow for the necessary synchronisation.

3.6.2. Methodological Analysis – lessons learned

- Joint testing has proved to be a suitable tool to serve cooperation between participating Member States. The uniform executions of the tests and presentation of test reports prevents time consuming discussions regarding possible different approaches and interpretations in case of several test laboratories. It also provides a professional impression to economic operators.
- The simple fact that market surveillance authorities show, in executing 'Joint Actions', to work together 'cross-border' gives a strong 'alert' signal to economic operators who are familiar with work in cross-border networks.
- If there is one weak point in the chain of economic operators than this causes all the links between the operators fail. If, during monitoring and sampling, addresses of economic operators are unreliable or not given, the chain fails. This is often not quite clear whether an economic operator is an EU importer or distributor; at economic operators, the proclivity exists to protect their source –addresses'. However, this knowledge forms the basis for a 'seamless' enforcement in market surveillance.
- To attempt to realise a Joint Action within the space of a single year, is rather short. It has been seen that at the end of the Joint Action some participating Member States continued the project locally in a larger composition of inspectors as promised in the agreement. This seems to be a good indication of its development in itself; however, the outcome of this inertness in the system cannot be claimed as a result of the Joint Action. A longer lasting Joint Action could be a solution; one must bear in mind also that some enforcement activities need a longer time than the planned time.
- If consumers, or the many small retailers, themselves act as an Internet importer of baby walkers, awareness of product risks through public product information probably will be the most successful approach.

3.7 Differences between Foreseen Results and those Actually Achieved

The table below (n. 13) compares the results in the work programme from the Grant Agreement [1], described as Deliverables D1 – D11, with those actually achieved in the Joint Action.

[1]	Foreseen Deliverable(D) or Result	Deliverable or Result Actually Achieved?	Deliverable Annex D:
D1	Kick-off meeting	Yes, minutes and attendance list (27-1-10)	D1a, D1b
D2	First project meeting	Yes, minutes and attendance list (25-2-10)	D2a, D2b
D3	Detailed implementation plan	Yes, detailed implementation plan in Gantt Chart format (2-10)	D3
D4	Terms of reference for testing laboratories	Yes, terms of reference in call for tender (closed 15-3-10)	D4
D5	Selection of testing laboratories	Yes, overview laboratory quotations (30-3-010)	D5
D6	Second project meeting	Yes, minutes and attendance list (30-6-10)	D6a, D6b, D6c, D6d
D7	Interim Report	Yes, submitted 1 July 010	
D8	Results of laboratory testing	Yes, IISG test reports received in June and July 010; originals direct to participants	D8a, D8b, D8c, D8d,
D9	Third project meeting	Yes, minutes and attendance list (16-9-10)	D9a, D9b
D10	Final workshop/final meeting	Yes, minutes and attendance lists workshop (15-11-10); final meeting (7-12-010), minutes importer visit (17-12-10)	D10a, D10b, D10c, D10d, D10e, D10f.
D11	Final Report	Yes, submitted 31 January 2011	

Table 13: Differences between Foreseen Results and those Actually Achieved

	Not-foreseen Deliverables or Results	Deliverable or Result Actually Achieved	Deliverable Annex:
1.	Two extra tests at IISG upon the influence of the baby walker mass	The test results confirmed the related US - CPSC study for standard improvement on new baby walker legislation (the CPSIA).	D8c, D6c, D6d, WebEx
2.	Visit to members CEN TC252 WG1	Coordinator presented the Joint Action and test results in Power Point on the start-up meeting of WG1 for the revision of EN 1273:2005 (19-10-2010 in Amsterdam)	D8b, WebEx
3.	Excel parameter sheet	Sheet allows parameter sensibility study on clause 5.12; handed over to TC 252 WG1	D8d
4.	Production of an expert paper to CEN TC252 WG1	Coordinator wrote an expert paper to stress the importance of US choice of a fixed step edge velocity to support the start-up of the EN1273:2005 standard revision.	D8c
5	Production checklist baby walker	Participants produced a checklist baby walkers for future projects and custom collaboration	C7, C9
6	Production 'baby walker double-check-page'	Coordinator produced a 'double-check-page, made for customs use, to detect in 'a first eye on' a failing on clause 5.12. A Chinese translation is made that will fit in an outreach - programme to China in 2011.	C8, C10
7	Production PowerPoint presentation results JA Baby Walkers for a China outreach	Coordinator produced a presentation for the Shanghai week in October 2010; the Chairman of the PROSAFE board was invited by the European Commission to join a visit with the Chinese Authorities. A BW-results presentation was made.	WebEx WebEx
8	Visit with Polish MS Authority to a Polish importer	Meeting minutes (17-12-2010)	D10e

Table 14: Deliverables achieved but not foreseen in the contract

4 Financial Result

	Original Budget (€)	Total Expenses (€)	Difference (€)
Direct costs			
Int/ext. Staff	112.667	122.376	- 9.709
Travel & subsistence	66.700	48.528	18.172
Equipment	0	0	0
Subcontracting	16.000	17.341	- 1.341
Miscellaneous	8.500	2.101	6.399
Total direct costs	203.866	190.346	13.520
Indirect costs			
Overhead 7%	14.271	13.324	947
Total expenditure	218.137	203.671	14.466
Revenue			
Resource of the participants	65.810	66.771	- 961
Other sources of funding	0	0	0
Revenue generated by the Joint Action	0	0	0
Amount of EU support requested	152.327	136.900	15.427
Total revenue	218.137	203.671	14.466

Table 12: The budget and the actual expenditures of the Joint Action.

(A negative difference means that the expenses exceeded the budget.)

Bibliography

All quotes and references in the text are stated with a number in brackets, e.g. [1]. The full list of references is given below.

1. The Grant Agreement for the Joint Action on baby walkers, Agreement number -2009 82 04-

2. EN 1273:2005 Child use care articles – baby walking frames – Safety requirements and test methods. The standard is available through CEN and the national standardisation organisations.

3. Commission communication in the framework of the implementation of the Directive 2001/95/EC of the European Parliament and of the Council on general product safety, (Publication of titles and references of European standards under the directive)", Official Journal of the European Union on 17/2/2009 (2009/C 38/08).

4. Decision meeting US Consumer Safety Product Safety Commission on 26 May 2010 to issue a final rule under section 104(b) of the Consumer Product Safety Act for Infant walkers coming into force December 2010, Internet address: www.cpsc.gov/library/foia/foia10/brief/walkers.pdf;

5. "Statistics over RAPEX Notifications". Published by the European Commission, DG SANCO, on the website http://ec.europa.eu/consumers/safety/rapex/stats_reports_en.htm;

6. Nursery Products Report, September 2009, US Consumer Product Safety Commission www.cpsc.gov

7. Document 'Considerations for further analysis on EN 1273:2005', on PROSAFE's WebEx, document depository, button baby walkers,

8. Baby Walkers – Market Surveillance 2008 – 2009 – Report 2009:12, Konsumentverket.KO/Swedish Consumer Agency, www.konsumentverket.se

9. Baltic Sea Market Surveillance Network 2009, Fifth report cooperation with customs.

10. Baltic Sea Market Surveillance Network 2010, Sixth report cooperation with customs.

11. Baby walkers Draft final report, Consumer Council Austrian Standards Institute in co-operation with the Association for Consumer Information, date 2000-10-15, European Commission Mandate M/253.

12. "Best Practices in Market Surveillance", PROSAFE, 2008. The book is one of the key deliverables from the project "Enhancing Market Surveillance through Best Practices (EMARS)". The book can be downloaded from www.prosafe.org.