



## Comments on a proposal for a new ISO committee on Consumer Product Safety Management

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At the end of October, the Standardization Administration of China (SAC) submitted a proposal to create a new ISO Technical Committee on Consumer Product Safety Management.

According to the proposal the scope of the future Technical Committee would include “Standardisation in the field of consumer product safety management to develop terminology, requirements, principles, framework, guidance, testing methods and supporting tools, for all relevant organizations, on and to support activities such as risk evaluation, safety early-warning and traceability, intelligent regulatory technology, safety control for emerging consumer products, safety management of the consumer products for specific population groups”.

Small Business Standards (SBS) does not support this proposal for the following reasons:

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### Unclear added value and overlap with existing work

The scope of the proposal is very general and does not bring any added value, especially from a European perspective. Most mentioned work items are already addressed by European product specific legislation and/or standards. Moreover, in the field of consumer product safety there is certainly not an added value for a general approach. On the contrary, enforcement reports highlight the need for a product specific approach.

SBS is also concerned that the proposal if accepted would lead to overlapping standards. Overlapping of scope with several other TCs, which are concerned with product safety, seems inevitable. The proposal fails to explain the interaction with the existing product specific standards, how the work differs from apparently similar activities, and how duplication and conflict will be minimised. If the new Committee is created there would surely be conflicts between different TCs and this could potentially lead to contradictory provisions in different standards. For SMEs this will certainly not help to deal with consumer product safety but on the contrary, make the situation even more complex.

The proposal excludes topics already covered by some existing Technical Committees such as food, automotive, consumers in vulnerable situations (ISO/PC 311), ageing societies (ISO/TC 314), which are directly related to the scope. This reduces a potentially reasonable scope of action of a new Consumer Product Safety Management Committee and further questions the added value of a new TC in this area.

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## **Proliferation of management standards**

SBS is concerned that the proposed work may lead to excessive proliferation of management system standards. Risk management for consumer products does not differ substantially from risk management for any other products. Therefore, we fail to see the added value of a general standard in this area.

## **Lack of consideration of SMEs**

The proposal does not take into consideration SMEs as a main stakeholder category, nor does it explain how they would benefit or be impacted by the proposal. No statement identifying and describing relevant affected stakeholder categories (including small and medium sized enterprises) and how they will each benefit from or be impacted by the proposed deliverable(s) as requested by the ISO/IEC Directives is included in the proposal. Moreover, the listing of relevant external international organisations to be engaged does not include any organisation representing SMEs. We would like to remind that the 'ISO Guidance for writing standards taking into account micro, small and medium-sized enterprises' needs' stresses that "It is important for standards to be market-relevant and reflect the needs of all stakeholders, including SMEs".