

CASP 2024 Standardisation

Final activity report

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List of abbreviations

CASP	Coordinated Activities on the Safety of Products
CEN	European Committee for Standardisation
CENELEC	European Committee for Electrotechnical Standardisation
CSN	Consumer Safety Network
DG JUST	Directorate-General for Justice and Consumers
EN	European Standard
EU	European Union
GPSD	General Product Safety Directive
GPSR	General Product Safety Regulation
HA	Horizontal activity
IM	Intermediate meeting
MSA	Market surveillance authority

Executive summary

Objectives

The Coordinated Activities on the Safety of Products (CASP) projects are designed to facilitate collaboration between market surveillance authorities (MSAs) from the European Union (EU) and European Economic Area to enhance the safety of products in the European single market. The CASP 2024 horizontal activity (HA) on standardisation seeks to fill existing gaps in the use of standards for assessing the risk of products covered

by the General Product Safety Regulation (GPSR). This activity followed two core objectives: first, to create a platform for MSAs to exchange insights and develop a strategy for the use of standards by analogy when products are not covered by existing standards; and second, to identify GPSR products that are currently not covered by a specific European standard cited in the Official Journal of the EU.

Outcomes

- ▶ **Handbook on the use of standards by analogy:** with guidance drawing from MSAs' practice and experience to cultivate a more streamlined approach to handling scenarios where standards are not available.
- ▶ **Compilation of ten case studies:** each built around a specific product or product area where a technical standard does not exist specifically for this product

and outlining the strategy MSAs participating in this activity have developed to assess the safety of these products.

- ▶ **List of GPSR products that are currently not covered by a specific European standard cited in the Official Journal of the EU:** identifying over 15 different products for which addressing the gaps in standardisation should be prioritised.

Conclusions

MSAs face challenges in identifying the right approach to assessing the safety of products for which no specific technical standards exist. A coherent and clear set of guidelines is crucial to facilitate the process of applying standards by analogy when these situations arise, and to ensure that the approach followed by MSAs is consistent such that potential risks can be reliably identified. Throughout the activity, these guidelines were developed in the form of a handbook that outlines a comprehensive methodology. To further support this, ten specific case studies were developed to illustrate the application of the methodology to real-life examples. These case studies are specifically designed to guide MSAs through applying

standards by analogy. While the primary audience for both deliverables is the MSAs, the handbook may also serve as a valuable resource for economic operators seeking to understand how the safety of their products may be assessed.

Additionally, participating MSAs and the relevant partners identified certain product categories for which no specific standards currently exists, and which should be treated with priority for future standardisation exercises. The identified priority categories can also be found in the handbook with specific information related to the products.

Activity overview

Introduction and main objectives

The GPSR ensures a high level of consumer protection across the EU by setting out that consumer products need to be safe before being placed or made available on the single market. MSAs play a crucial role in enforcing these rules, identifying unsafe products and taking appropriate measures to mitigate risks. However, when specific European standards are not available for a given product, MSAs face challenges in assessing its safety and need to rely on alternative approaches.

In such cases, MSAs can refer to the standards of similar or related products to ensure the safety of the product under assessment. However, there are currently no specific guidelines for MSAs to follow when assessing a product's risk based on a standard developed for another similar or related product or product category. The absence of harmonised procedures for using standards by analogy can create uncertainty for both the MSAs and the economic operators involved. When applying a standard for a similar product to the one in question, MSAs may apply the interpretations differently, resulting in different safety outcomes for similar products across Member States, or they may steer away from assessing these products altogether due to the high degree of uncertainty.

To address these challenges, the CASP 2024 standardisation horizontal activity aimed to establish a structured platform for MSAs to collaborate and share best practices and experiences related to this challenge. By bringing together

MSAs from different Member States, the activity facilitated the exchange of best practices and methodologies for the use of standards by analogy, which were gathered and compiled into general guidelines for MSAs in the *CASP 2024 Standardisation Handbook*. This handbook serves as a comprehensive guide for MSAs offering practical insights into existing practices, challenges and methodologies for risk assessment and testing, thereby fostering common approaches among MSAs. Additionally, a compilation of ten case studies was developed to demonstrate the handbook's methodology and guidelines for applying standards by analogy in practice for ten product categories. These categories include air fryers, remote control devices and other devices using coin-cell batteries, ozone/UV air purifiers, learning towers, coffee machines, wireless chargers, electronic cigarettes, soda water machines, hygiene products and handcarts.

The activity also focused on outlining future standardisation priorities under the GPSR. Through a consultative process, MSAs aimed to identify current gaps and provide a list of certain product categories for which no standards currently exist, and which should be treated with priority.

Participating market surveillance authorities

		Country	Name of the authority
1		Austria	Federal Ministry of Social Affairs, Health, Care and Consumer Protection Unit III/A/3 Product Safety
			Austrian Agency for Health and Food Safety (AGES)
2		Cyprus	Department of Labour Inspection
3		Germany	State Directory of Saxony
4		Sweden	Swedish National Electrical Safety Board
5		Italy	Torino Chamber of Commerce

Main activities and outcomes

Scope of the activity

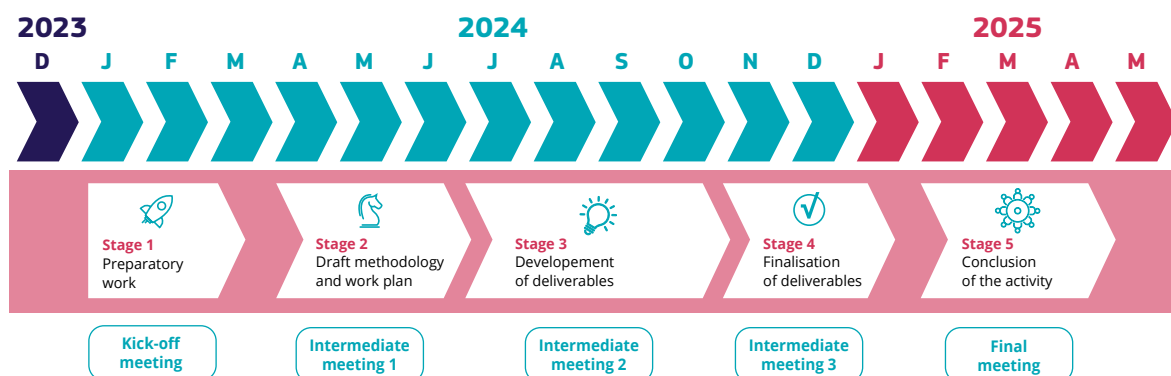
The scope of the HA on standardisation CASP 2024 project was to develop a clear and coordinated methodology for MSAs to refer to when applying standards by analogy to similar products lacking specific technical standards. To achieve this, the activity provided participating MSAs with

a platform to exchange their experiences, challenges and best practices in these situations. The collaboration between MSAs was facilitated by a technical expert, who was invited to contribute expertise and insights to the project and steer the development of the deliverables.

Work approach

The work approach for this activity followed a five-stage process as outlined in Figure 1.

Figure 1. Timeline of the standardisation activity



The first stage consisted of conducting preparatory work to identify the needs and expectations of each of the parties involved, and to define the scope of the activity. This included first a scoping interview with the technical expert and desk officers from the Directorate-General for Justice and Consumers (DG JUST) at the European Commission to identify the expectations and deliverables of the activity. This was followed by a survey conducted among some of the participating MSAs to collect information on their experiences, preferences and the challenges they face when applying standards by analogy. Further preparatory work included contacting standards organisations — The European consumer voice in standardisation (ANEC), the European Consumer Organisation (BEUC), and the European Committee for Standardization together with the European Committee for Electrotechnical Standardization (CEN-CENELEC) — to gather their knowledge and insights on standardisation, and to gather recommendations for the case studies of products not covered by specific technical European standards.

The first stage concluded with a kick-off meeting (KoM) in March 2024, when the project team presented the activity's scope, objectives and planned deliverables, and the outcome of the survey. During the KoM, the technical expert and MSAs were invited to a group discussion to share their insights on applying standards by analogy. Participants engaged in a first brainstorming session on the selection of case studies and the list of future priorities for standardisation under GPSR.

The second stage of the activity focused on drafting the methodology and work plan of the activity. Through interactive in-person and online consultations, the participants decided on the selection of ten products for the case studies. The MSAs further collaborated online through consultations on the project's wiki to co-develop a first draft of the methodology to be applied for the handbook.

At the first intermediate meeting (IM1), the draft methodology and outline of the handbook were presented, and an interactive session using a collaborative online tool took

place to evaluate how to optimise the methodology. Further, some of the selected case studies were examined in group sessions to begin developing risk assessment templates and identifying the standards to be applied by analogy.

The third stage of the activity focused on the development of the deliverables. This consisted of MSAs regular consultation on wiki to contribute to their assigned case studies. The methodology was revised based on feedback from the IM1 and was uploaded on wiki for MSAs for review and comment on.

The aim of the second intermediate meeting (IM2) was to further co-develop the case studies and risk assessment templates. Further, a feedback session was held to discuss the outline of the handbook and the main contents to be included.

The fourth stage of the activity consisted of MSAs continuing their group work on the case studies through wiki, drafting a first version of the handbook, and finalising the list of future priorities for standardisation development.

This stage concluded with the third intermediate meeting (IM3) at which the MSAs collaborated in an interactive session using the online tool to continue the work on case studies and applying the five-step methodology. They also provided feedback on the draft of the handbook.

The fifth and final stage of the activity consisted of completing the deliverables and gathering MSAs' feedback and approval. At the final meeting, additional feedback and comments were discussed to finalise the development of the deliverables.

Development of the deliverables

Handbook

A handbook was developed as a guiding document for MSAs when assessing a product for which no specific standards exist. The handbook is based on a methodology developed by the technical expert and fine-tuned with feedback from participating MSAs throughout the activity. The handbook includes a chapter on the legal framework, including the GPSR, obligations for economic operators to ensure the general safety requirement, and the use

of standards under the GPSR. It also includes a chapter on the proposed methodology for the risk assessment of products not covered by existing specific standards. The handbook describes the steps to be taken when applying standards by analogy and also addresses some of the challenges that may occur in these situations and how these can be tackled.

Figure 2. The five-step methodology



* Note: manufacturers should identify and list all potential hazards related to their products before placing them on the market.

The five-step methodology in the handbook is the core of this activity's deliverables and can be summarised as follows.

1. Start by assessing the product's labels, certifications and safety warnings, including those in the instruction manual. If the product's markings are absent, unclear or incomplete, compare the product with other compliant products of the same category in the market.

2. Define the product's characteristics and risks, including physical attributes, functionality, manufacturing process, purpose, and target consumers. Identify the potential risks associated with the product's characteristics, intended use and target consumers.

3. Identify products which share similarities with the one under consideration and establish criteria for determining when a product can be considered similar enough. There may be more than one similar product and therefore more than one standard that can be used by analogy. The factors for consideration are technology, function, materials, associated risks, intended use, consumer group, etc.

4. Analyse the standards applicable to the identified similar products. If more than one standard is applicable, choose the closest match in terms of relevance and applicability. Conduct a comprehensive analysis of the standard to determine if it fits the product's context and characteristics and evaluate whether the standard adequately covers the relevant risks associated with the product.

Case studies

The compilation of case studies aims to provide MSAs with real-life examples of the application of standards by analogy when a specific standard for a product category does not exist. In the case studies, the five-step methodology from the handbook is applied thoroughly and can be complementary references to the handbook to guide MSAs when a specific standard for a product does not exist.

5. Address the identified gaps and over-assessment.

If the selected standards do not adequately cover all the risks or characteristics of a product, supplementary risk assessments or best practices from related standards might be considered. At the same time, it is important that product safety standards applied by analogy do not impose excessive requirements on a specific product. If over-assessment is identified, MSAs should consider adjusting or tailoring certain requirements to better fit the specific product while still ensuring safety.

Horizontal tasks

- ▶ **Consultation with colleagues, experts, and stakeholders:** initiatives like the CASP projects or the Consumer Safety Network (CSN) help build a network across Europe on which MSAs can rely to engage with other MSAs on topics related to product safety, including reviewing a chosen standard by analogy or risk assessment approach. Involving stakeholders like industry specialists, manufacturers and standardisation organisations can provide valuable technical knowledge to fine-tune the approach.
- ▶ **Documentation and record-keeping:** it is important to maintain thorough records of all steps taken, including product characteristics, risk assessments, standard selection and any modifications made. This documentation is crucial for transparency and accountability.

Over the course of the activity and the three intermediate meetings, the MSAs collaborated to apply the five-step methodology in practice to ten products for which no specific standards exist. Following agreement on the ten product categories (see Figure 3), the specific products evaluated for the case studies were examples chosen from the Safety Gate, the EU rapid alert system for dangerous non-food products¹.

¹ [Safety Gate: the EU rapid alert system for dangerous non-food products.](#)

Figure 3. The ten product categories for the case studies



For two of the product categories, handcarts and hygiene products, no example had been alerted on Safety Gate until March 2025. In those two cases,

fictional products based on real-life risks were selected for the case studies. The finalised case studies can be found in the handbook's annex.

List of GPSR products that are currently not covered by a European standard cited in the Official Journal of the EU

As part of the second core objective of the activity the participants discussed at each of the five stages the list of products for which no specific standards currently exist. This list is intended as a starting point to begin addressing the current gaps in standardisation under the GPSR. The technical expert, MSAs and ANEC jointly selected the products to include in this list based on either risks which they identified or based on complaints they received about the products. The consultation took into consideration both the type of risk and the target consumers. Based on these criteria many of the products in this list are nursery and young children's products, considering the high vulnerability of the users.

The list contains the following products:

- ▶ soda machines;
- ▶ baby bean bags and baby sleep positioners;
- ▶ nursery pillows;
- ▶ sensory swings;
- ▶ combination strollers;
- ▶ children's tables;
- ▶ sports and playground equipment, incl. ziplines;
- ▶ elastic straps with hooks at the ends for fastening (octopus);
- ▶ hot-water bags;
- ▶ button batteries;
- ▶ decorative products or hygiene or cleaning products with a misleading appearance (food);
- ▶ products worn by children².

A more detailed product description and the potential risks they pose to consumers can be found in the *CASP 2024 Standardisation Handbook*.

² It should be noted that some of the products listed, such as baby neck rings, are not automatically considered by MSAs and ANEC as items for which a standard should be established, as they believe that some of these products should not be available on the market at all.

Conclusions

Assessing product safety when a specific standard does not exist for a given product can pose a significant challenge for MSAs, as the procedures to follow in such situations are not clearly defined. One way to mitigate this difficulty is to use standards by analogy. However, in order to do so, it is important for MSAs to adopt a well-structured and consistent approach, and to assess the product's potential risks as comprehensively as possible.

By developing a thorough methodology for the use of standards by analogy and applying it in practice to ten different case studies, this activity was able to set the groundwork for conducting risk assessments where specific standards for products are absent. The deliverables can help ensure that products placed or made available on the European market that are currently not covered by a specific standard are adequately evaluated for safety.

The handbook serves to ensure that MSAs applying standards by analogy, when necessary, can follow a clear set of guidelines and an aligned approach to increase the consistency, replicability and reliability of their assessments.

Furthermore, the second pillar of this activity intended to identify the current priorities for standardisation under the GPSR which should be addressed by the European Commission and standardisation organisations. Many of the product categories identified as a priority are related to childcare items, as the target consumer group of young children is especially vulnerable. Therefore, the safety of these products must be carefully assessed.

What is CASP?

The Coordinated Activities on the Safety of Products (CASP) project enables close cooperation between market surveillance authorities from European Union /

European Free Trade Agreement countries to ensure the safety of products on the Single Market.

CASP 2024 includes seven product-specific testing activities and two horizontal activities

Participants in the product-specific activities test the jointly selected products sampled on their respective national markets. The products are tested in accredited laboratories in the EU/EFTA according to the commonly agreed testing criteria.

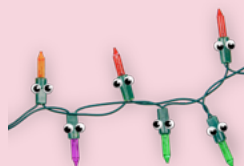
CASP 2024 also includes one re-testing activity. Based on the same testing plan as in the previous testing campaign of the given product category, the re-testing initiative involves repeating large-scale market surveillance activities for those product categories to verify the compliance level after a certain period of time.



PSA 1
Baby soothers



PSA 2
High chairs



PSA 3
Lighting chains



PSA 4
Mini electric heaters



PSA 5
Disposable electronic
cigarettes

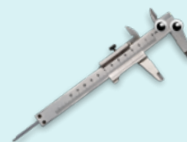


PSA 6
Bicycles for children



PSA 7
Slime toys (re-testing)

Horizontal activities provide a knowledge-exchange forum for market surveillance authorities. With the guidance of technical experts in the relevant fields, the participants develop common approaches, procedures, and practical tools for market surveillance.

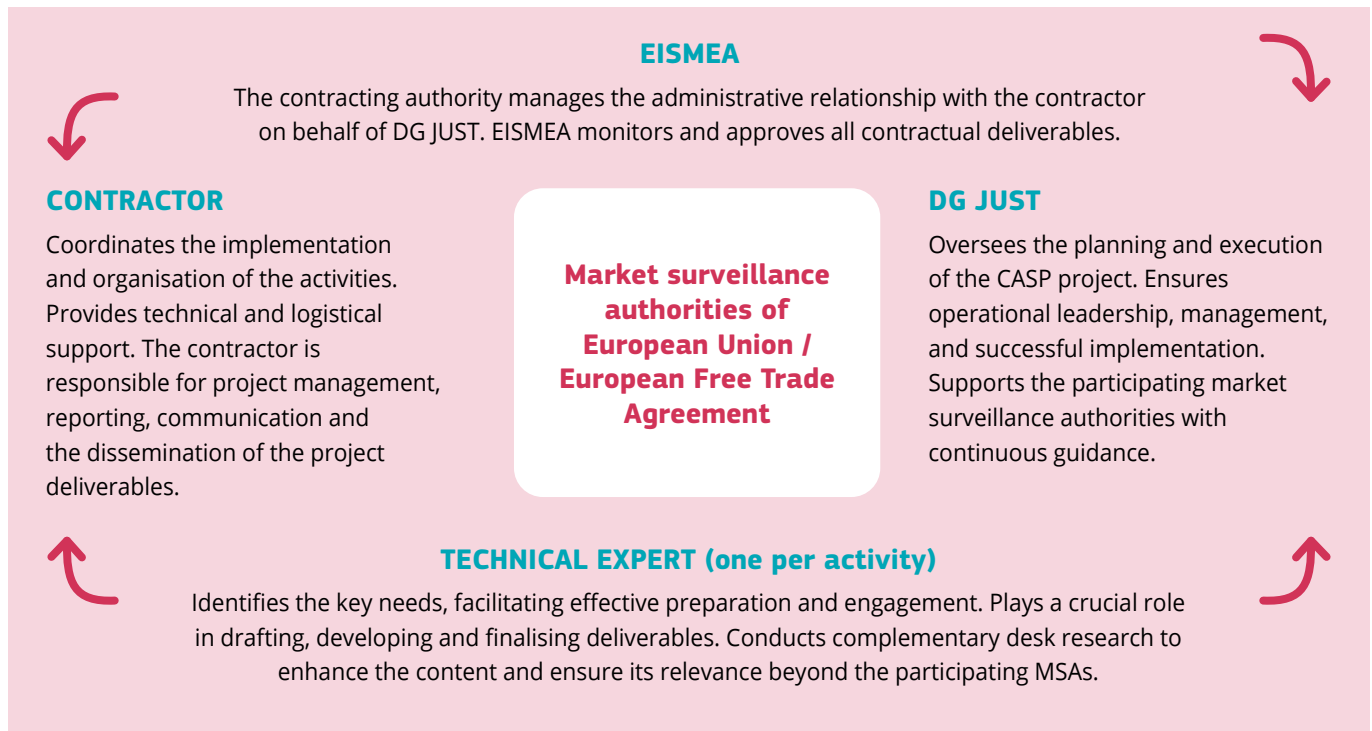


HA 1
Standardisation – use of
standards by analogy

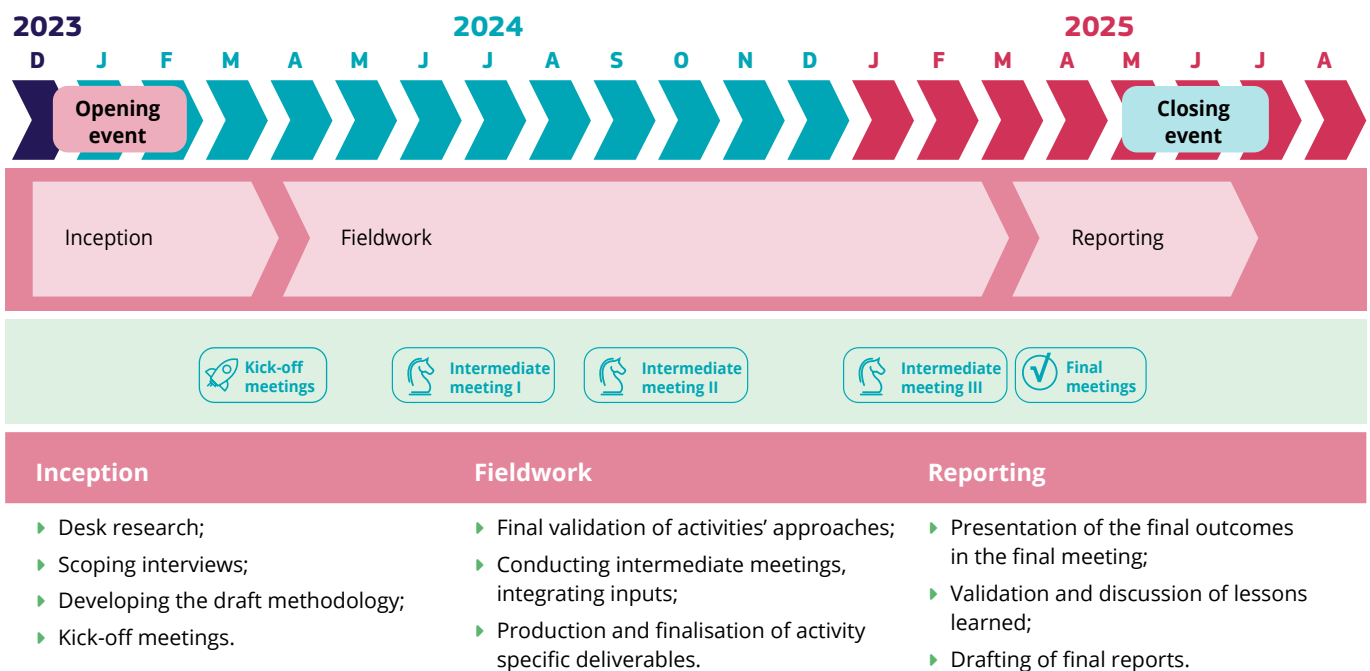


HA 2
Starter kit for
newcomers

Roles and responsibilities



Horizontal activities work plan



Horizontal activities' processes and tools

0 Pre-CASP process

DG JUST conducts a priority-setting exercise with market surveillance authorities to select topics of common interest prior to the launch of each CASP project.

The CASP 2024 horizontal activities reflect the interest of market surveillance authorities in training and onboarding materials for new officers and addressing risk assessment challenges for products not covered by any standards.

1 Fine-tuning of activity objectives

The fine-tuning of activity objectives involves a comprehensive process to ensure alignment with the needs and expectations of market surveillance authorities. This process begins with conducting surveys, desk research and a thorough needs assessment to gather insights from market surveillance authorities about their specific needs, challenges and priorities, and identifying key areas of focus for each activity.

Kick-off meetings provide a platform for open dialogue and a refinement of objectives. Throughout this process, close collaboration with market surveillance authorities through wiki consultations ensures that the refined objectives are realistic, achievable and aligned with their operational goals.

2 Development of methodology

The development of the methodology begins with an initial draft, which is built upon and refined through a series of three intermediate meetings and ongoing wiki consultations with market surveillance authorities.

The draft is continuously refined and adjusted based on feedback from participants, ensuring that it is practical and tailored to their specific needs. This iterative process ensures that the final outcome is comprehensive and well-aligned with the objectives and needs of the market surveillance authorities.

3 Development of deliverables

While the deliverables are already outlined in the project's terms of reference, they are co-developed by the market surveillance authorities to ensure relevance. Incorporating input from market surveillance authorities, the deliverables — such as a handbook, case studies, infographics, videos and graphs — are based on the agreed methodology and developed with the guidance of the technical expert.

This collaborative approach ensures that the deliverables are tailored to the specific needs and challenges identified by the market surveillance authorities, enhancing their effectiveness and impact.

4 Finalisation of the outcome, lessons learned and recommendations

The final step involves validating the outcome for each activity, discussing lessons learned and formulating recommendations. This process ensures that the project delivers valuable insights and actionable guidance for future activities. Presenting the outcome in the final meeting ensures they meet the objectives and expectations set during the project.

Finally, drafting final reports that include recommendations and lessons learned provides a roadmap for future improvements and initiatives.

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