



# CASP2021

Coordinated Activities  
on the Safety of Products



Reclined cradles  
and baby swings



Final  
Report

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## List of abbreviations

ABBREVIATION	DESCRIPTION
CASP	Coordinated Activities on the Safety of Products
DG JUST	Directorate-General for Justice and Consumers of the European Commission
EEA	European Economic Area
EISMEA	European Innovation Council and SMEs Executive Agency
EN	European Standard
EO	Economic operator
EU	European Union
GPSD	General Product Safety Directive (2001/95/EC)
MS	Member State
MSA	Market surveillance authority
PSA	Product-specific activity
RAG	Risk Assessment Guidelines
RAPEX Guidelines	Decision (EU) 2019/417
Safety Gate	Rapid alert system for dangerous non-food products

# Executive summary

## Objectives of the activity

The Coordinated Activities on the Safety of Products (CASP) projects enable all the market surveillance authorities (MSAs) from European Union (EU)/European Economic Area (EEA) countries to cooperate in reinforcing the safety of products placed on the European Single Market. This activity focused on two categories of childcare articles, which were identified by the MSAs as a priority for a targeted safety investigation. The products were sampled and tested following commonly agreed criteria in a European laboratory selected by the participating MSAs.

### Product scope

1. Reclined cradles
2. Baby swings

### Main testing criteria

A selection of clauses from the following two European Standards (ENs) were included in the testing plans:

- EN 12790:2009 – Child use and care articles – Reclined cradles;
- EN 16232:2013 + A1:2018 – Child use and care articles – Infant swings.

Both chemical and mechanical tests were performed by the laboratory. The MSAs performed checks on warnings, markings and instructions in their national languages.

## Key recommendations

### For consumers

Pay particular attention to warnings and markings and carefully follow the instructions.

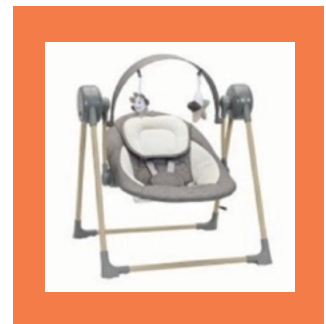
Report any safety problems that arise when using a product and keep yourself informed about recall actions.

Properly dispose of the packaging and keep it away from children. It presents suffocation risks if it is not disposed of correctly.

### For economic operators (EOs)

Be aware of your obligations under the applicable legislation.

Clearly communicate with consumers about recalls. participation in recalls.



## Results

- Number of products tested – 105:
  - 68 reclined cradles
  - 37 baby swings.
- A total of 51% of the samples (54) met the requirements of the testing plan.
- A total of 49% of the samples (51) did not meet at least one of the requirements of the testing plan.
- The mechanical tests revealed a considerably larger number of failures (48%) than the chemical tests (2%).
- The baby swing product category had a much higher failure rate (68%) than the reclined cradles (38%).
- A total of 46% of the samples did not meet the requirements on warnings, markings and instructions.

## Conclusions

Almost half of the tested samples did not meet the relevant requirements.

The results of the tests suggest that even though only a small number of products present chemical risks, the risks revealed by the mechanical tests are quite serious. Further efforts are needed to protect EU consumers and stop dangerous childcare articles appearing on the Single Market.

Risk assessments performed by the MSAs showed that 5 samples presented a serious risk, 5 a high risk and 9 a medium risk.

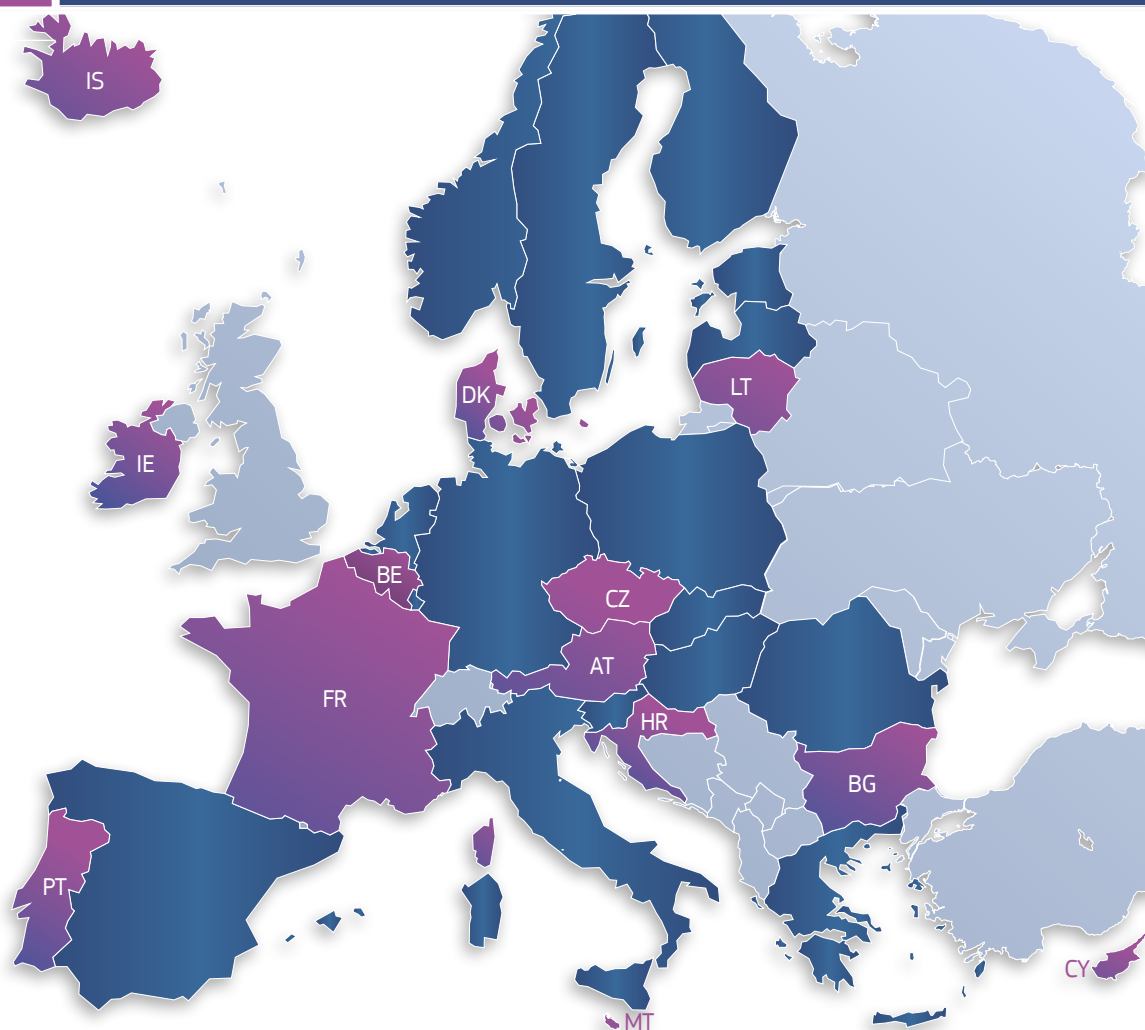
1 product was recalled from the market and 12 were withdrawn.

# 1. Overview of the activity

## 1.1 Participating MSAs

A total of 14 MSAs from 12 EU Member States (MS) and 1 EEA country participated in the Reclined cradles and baby swings product-specific activity (PSA), as illustrated in the image below.



COUNTRY	MSA
Austria	Federal Ministry of Social Affairs, Health, Care and Consumer Protection, Unit III/A/2 - product safety
Belgium	Federal Public Service Economy - Directorate General Quality and Safety
Bulgaria	Commission for Consumer Protection
Croatia	State Inspectorate
Cyprus	Consumer Protection Service
Czechia	Czech Trade Inspection Authority
Denmark	Danish Safety Technology Authority
France	Directorate-General for Consumer Competition and Fraud Enforcement Directorate-General of Customs and Indirect Taxes
Iceland	The Housing and Construction Authority
Ireland	Competition and Consumer Protection Commission
Lithuania	State Consumer Rights Protection Authority
Malta	Malta Competition and Consumer Affairs Authority
Portugal	Consumer Directorate-General



## 1.2 Product scope and testing criteria

### 1.2.1 Product scope

Table 1 - Product scope

RECLINED CRADLES	BABY SWINGS
<p>Fixed or folding chairs for infants designed to accommodate a child in a reclined position; intended for children weighing up to 9 kg who are unable to sit up unaided.</p>	<p>Similar to reclined cradles, but they allow the chair to swing; intended for children weighing up to 9 kg who are unable to sit up unaided.</p>
	

### 1.2.2 Testing criteria

The testing plans included both chemical and mechanical tests (based on the requirements of EN 12790:2009 for reclined cradles and EN 16232:2013 + A1:2018 for infant swings). Electrical safety was excluded from the scope of the activity.

In addition to the laboratory tests, the MSAs also checked the accompanying warnings, markings and instructions in their own languages. A checklist with the main requirements was prepared by the technical expert to provide additional guidance to the MSAs.



## 2. Sampling and testing

### 2.1 Sampling distribution

The sampling was carried out on the basis of a pre-selection by each of the MSAs, in line with the peculiarities of each market.

Each MSA was invited to sample a total of 10 products. However, the total number of samples was eventually adjusted to accommodate the capacity of each MSA and the availability of the products in their market. This meant that some MSAs sampled more products than others. The MSAs chose how to distribute the total number of samples they assessed between

the two product categories and whether to sample products from both product categories or from only one.

A total number of 104 samples was collected. In agreement with the MSAs, one product was tested both as a reclined cradle and as baby swing. Thus, in total, 105 samples (68 reclined cradles and 37 baby swings) were tested by the laboratory. The table below illustrates the number of samples collected by the MSAs.

Table 2 - Number of samples collected by participating MSAs

COUNTRY	MSA	Samples collected	
		Reclined cradles	Baby swings
Austria	Federal Ministry of Social Affairs, Health, Care and Consumer Protection, Unit III/A/2 - product safety	6	1
Belgium	Federal Public Service Economy - Directorate General Quality and Safety	5	5
Bulgaria	Commission for Consumer Protection	6 <sup>1</sup>	5
Croatia	State Inspectorate	3	3
Cyprus	Consumer Protection Service	6	2
Czechia	Czech Trade Inspection Authority	5	5
Denmark	Danish Safety Technology Authority	15	/
France	Directorate-General for Consumer Competition and Fraud Enforcement	/	6
	Directorate-General of Customs and Indirect Taxes	/	2
Iceland	The Housing and Construction Authority	6	2
Ireland	Competition and Consumer Protection Commission	3	/
Lithuania	State Consumer Rights Protection Authority	2	3
Malta	Malta Competition and Consumer Affairs Authority	3	3
Portugal	Consumer Directorate-General	8	/
<b>TOTAL</b>		<b>68</b>	<b>37</b>

MSAs could decide on their preferred sampling channels and collect the products both online and in physical stores. The majority of samples (64%) were collected in physical stores.

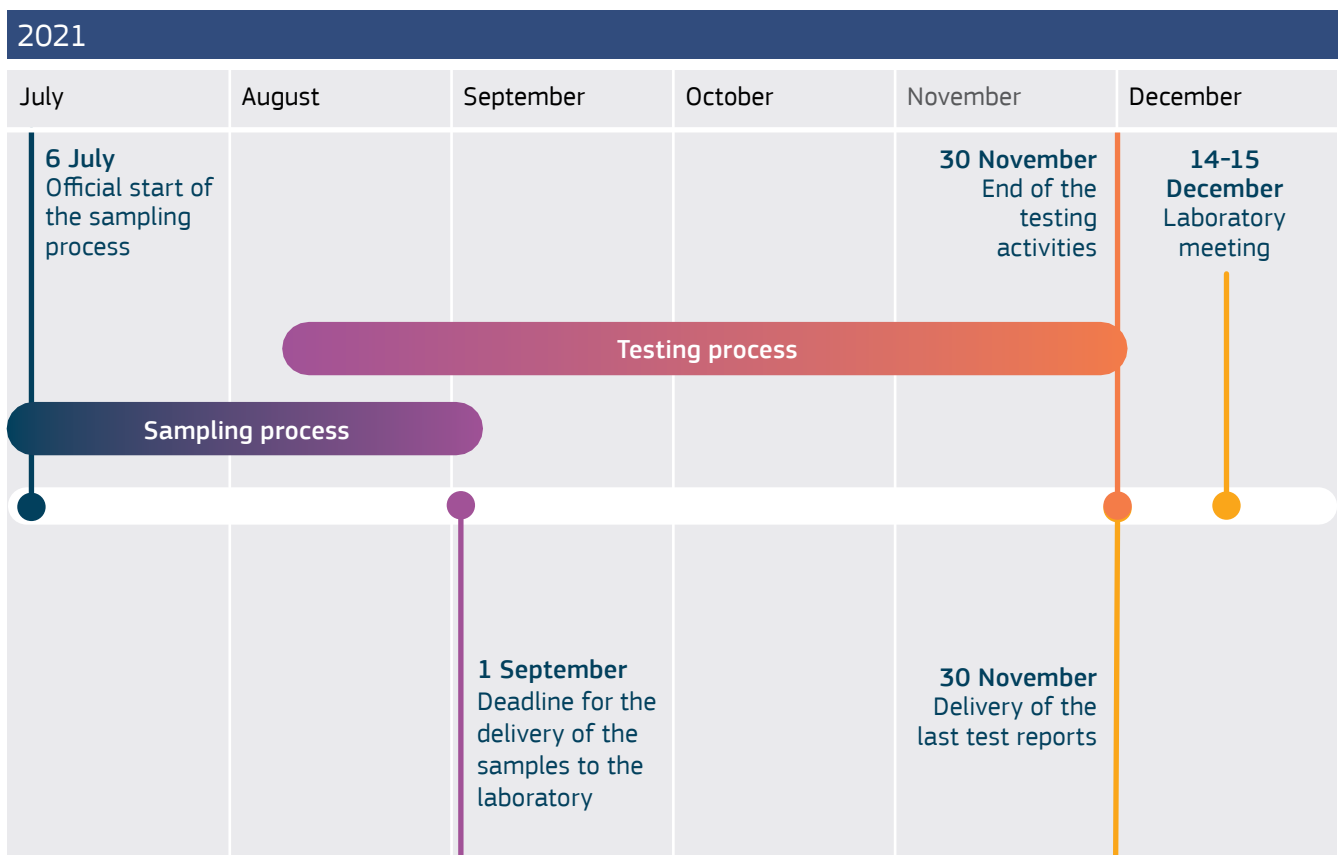
<sup>1</sup> One sample from Bulgaria was registered in the codification file as a baby swing, but it was also tested as a reclined cradle. Therefore, it is counted in both columns.

## 2.2 Testing process

Based on extensive desk research, 22 accredited laboratories located in the EU/EEA were identified. The project team prepared tender specifications and invited the identified laboratories to submit their offers. MSAs were presented with the comparative analysis of the technical suitability and financial offers of the three laboratories that answered the project team's invitation. The MSAs selected the laboratory that received the highest points in terms of technical quality; it had the accreditation and capacity to perform all the requested tests and the pricing it offered was competitive.

The MSAs had two months to collect the samples and send them to the laboratory. The testing process encountered no delays and was completed on 30 November. The laboratory meeting took place on 14 and 15 December 2021 (in a hybrid format<sup>2</sup>).

Figure 1 - Timeline of the sampling and testing process



<sup>2</sup> Members of the Contractor's team and representatives from the Directorate-General for Justice and Consumers of the European Commission (DG JUST) were at the laboratory with the audiovisual team; the MSAs joined the meeting via Zoom.

# 3. Test results

## 3.1 Overview of the test results and main findings

A total of 54 out of the 105 samples tested by the laboratory met the requirements defined in the final testing plans, as shown in the chart below. The remaining 51 samples did not meet at least one of the requirements.

Figure 2  
Overall test results (N=105)

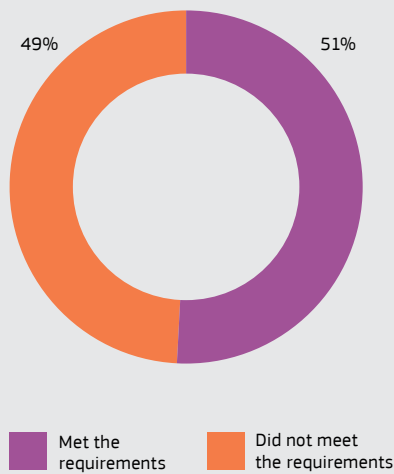
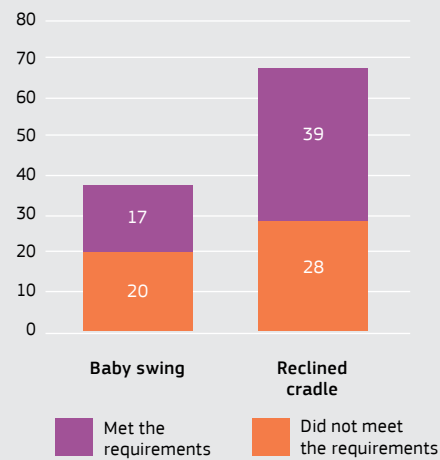


Figure 3  
Results of warnings, markings and instructions checks – Reclined cradles and baby swings (N=104)



The mechanical tests revealed a much higher number of failures (48%) than the chemical tests (2%). Only two baby swings did not meet the requirements on the chemical tests: one baby swing did not meet the requirements of clause 6.2 on the migration of certain elements and one baby swing did not meet the requirements of clause 6.3 on formaldehyde.

The MSAs performed checks on warnings, markings and instructions in their national languages: 46% of the samples did not meet the requirements. A large number of warnings and instructions were either not in the language, absent or illegible.





### 3.2 Results per product type

The baby swing product category had a much higher failure rate (68%) than the reclined cradles (38%). The test results per clause for each product category are illustrated in the graphs below<sup>3</sup>.

Figure 4 - Test results per clause, EN 12790:2009 – Reclined cradles (N=68)



Figure 5 - Test results per clause, EN 16232:2013 + A1:2018 – Baby swings (N=37)



<sup>3</sup> The clauses marked 'inconclusive' refer to tests that revealed values that were too close to the limits established by the relevant standard to establish a pass or a fail.

### 3.3 Results per retail channel

The majority of samples (64%) came from physical stores.

There was no difference in the test results based on the retail channel: 54% of the samples that were collected online met all the requirements, as did 54% of those collected from physical stores.

### 3.4 Conclusions on the test results

Both mechanical and chemical risks were identified in the tested samples. However, the chemical risk was substantially lower than the mechanical risk.

#### Mechanical risks

Regarding the reclined cradles, the highest failure rate (16%) was related to clause 5.10 on the angle and height of the seat, followed by clause 5.16 on slippage (10%). Clause 5.10 is related to ergonomics: if the product is designed incorrectly, a child can sustain irreversible spine damage. Risks related to clause 5.16 are linked to the reclined cradle falling (if it is not placed on the ground) and the injuries this may cause to an infant.

Regarding the baby swings, the highest failure rate (49%) was related to clause 8.4 on hazards due to a child falling, followed by clause 8.4.1 on angles (46%) and 8.4.2 on restraint systems (8%). The concern is that a child may slip out of the baby swing and sustain an injury (bruises and/or fractures). However, if the baby swing is placed on a table, the injury could be more severe; even fatal if the child has been left unattended.

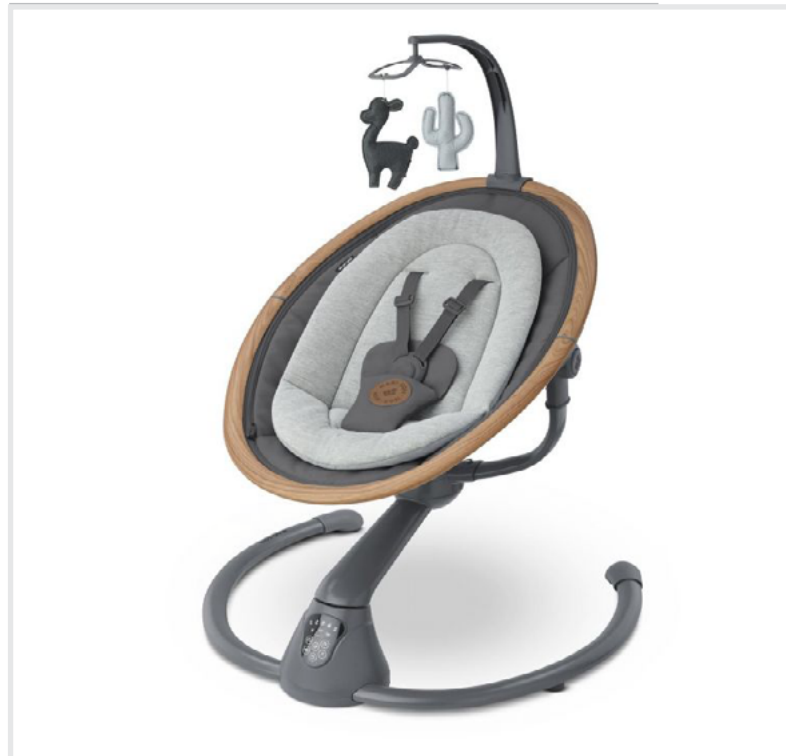
#### Chemical risks

Chemical risks were identified only in 2% of the childcare articles tested; and only in baby swings, the reclined cradles passed all the tests related to chemical risks. It is worth mentioning that the standard applicable to baby swings requires more extensive chemical testing (and includes tests for formaldehyde, colourants, primary aromatic amines and aniline), than the standard for reclined cradles.

#### Packaging, warnings, markings and instructions

Almost half of the samples (46%) did not meet the requirements on warnings, markings and instructions. Many products were supplied with incomplete information or were not in the correct languages, and some were sold with no safety guidance (e.g. the 'Never leave a child unattended' pictogram was missing). The safety guidance is essential for the safe use of any product.

Furthermore, a number of samples (four baby swings and five reclined cradles) did not pass the laboratory tests on the packaging material. If the PVC packaging is big enough to cover a child's head and thin enough to cling to their mouth and nose, it presents a serious risk of suffocation. However, if it is accompanied by the correct warnings (as was the case with one reclined cradle and one baby swing), this risk decreases.

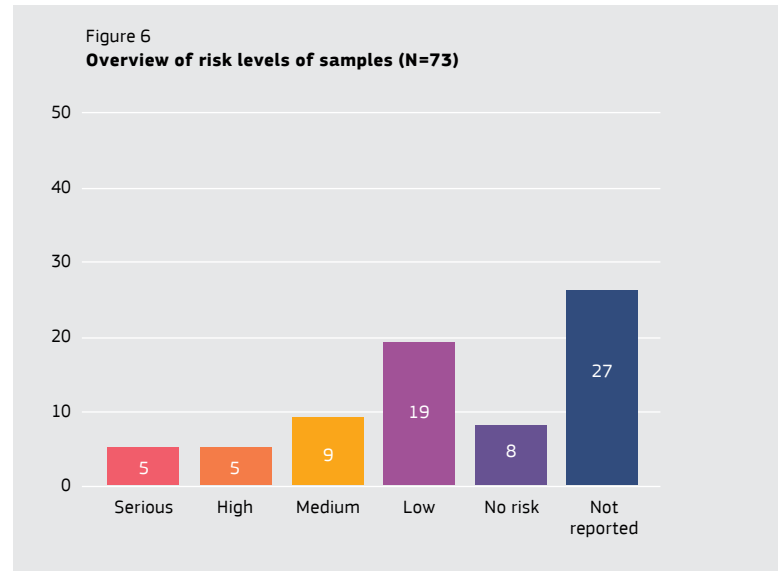


# 4. Risk assessment and measures

## 4.1 Risk assessment results

According to the GPSD<sup>4</sup>, a product has to be safe during its foreseeable use throughout its whole life. Therefore, when assessing whether a product poses a risk, the approach must be based on the common and reproducible risk assessment principles laid down in Decision (EU) 2019/417<sup>5</sup> (the RAPEX Guidelines). To develop the risk assessments, the MSAs used the RAG tool<sup>6</sup> managed by the EC.

Figure 6 shows the risk levels (based on the risk assessments performed by the MSAs) of the samples that did not meet the requirements.

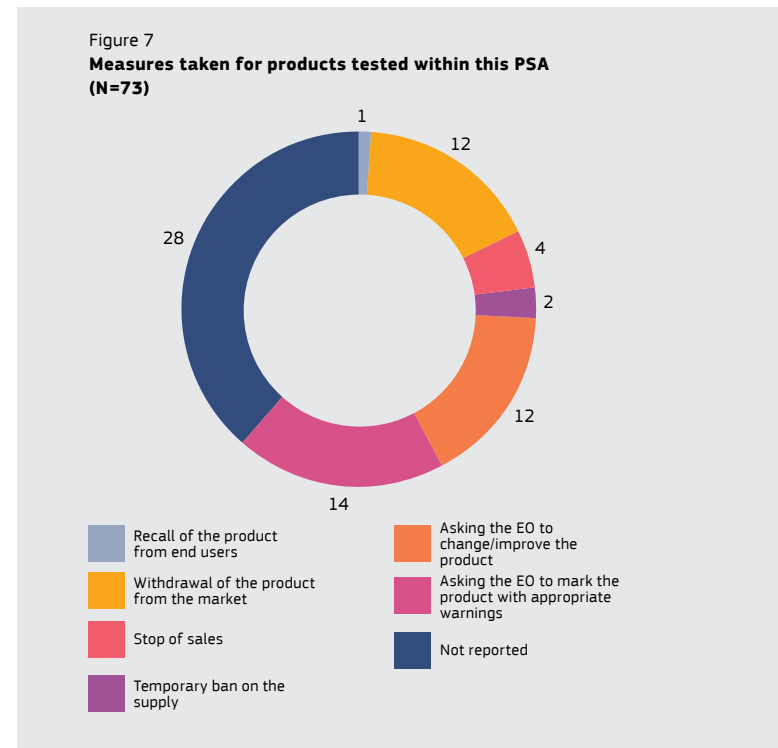


## 4.2 Corrective measures taken on tested products

Based on the test results and the risk assessments performed, the MSAs decide which corrective measure has to be taken regarding the products that do not comply with EU legislation and/or the applicable standards to stop dangerous products from appearing on the Single Market. Figure 7 illustrates the main measures taken.

Furthermore, when a serious risk is identified, MSAs are legally obliged to submit a notification in Safety Gate (pursuant to article 12.1 of the GPSD<sup>7</sup>). The RAPEX Guidelines<sup>8</sup> also recommend submitting notifications on measures taken against products posing a less than serious risk.

Following the actions triggered by the joint testing campaign, 9 products were subject to Safety Gate notifications and notifications for another 5 products are pending.



<sup>4</sup> <https://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=CELEX:32001L0095&from=EN>

<sup>5</sup> <https://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=CELEX:32019D0417&from=EN>

<sup>6</sup> <https://ec.europa.eu/rag/#/screen/home>

<sup>7</sup> <https://eur-lex.europa.eu/legal-content/EN/ALL/?uri=CELEX%3A32001L0095>

<sup>8</sup> <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=LEGISSUM%3A4390682>

# 5. Conclusions and recommendations

## 5.1 Conclusions

A total of 49% of the samples tested did not meet the requirements of the applicable standards. The baby swing product category had a much higher failure rate (68%) than the reclined cradles (38%).

The results of the tests suggest that even though only a small number of products present chemical risks, the risks revealed by the mechanical tests are quite serious, and further efforts are needed to protect EU consumers and stop dangerous childcare articles appearing on the Single Market.

Furthermore, almost half of the samples (49%) did not meet the requirements on warnings, markings and instructions. These are an important part of the risk profile of any product as they provide parents/caregivers with crucial information on a product's assembly and correct use.

MSAs issued 9 Safety Gate notifications based on the outcome of this PSA (another 5 notifications are pending) and requested the economic operators to recall or withdraw the products from the market or stop sales when they were assessed as posing serious, high or medium risk.



## 5.2 Recommendations for stakeholders

The following recommendations are based on the outcome of the testing process and discussions among MSAs during the project.

### For consumers

**Warnings, markings and instructions.** Pay particular attention to the warnings and markings that accompany the products. These should be available in the national languages of the country of sale.

**Use of products.** Read the instructions carefully for a safe use of the product. The following elements are very important when using a reclined cradle or baby swing:

- pay attention to how to correctly use the restraint system, shoulder straps and locking mechanism;
- never leave the child unattended in a reclined cradle or baby swing;
- never use these products on an elevated surface (e.g. a table);
- these products are not designed for prolonged periods of sleeping, so do not use them for this purpose.

**Recalls and reporting safety problems.** Be aware of where information about recalled products can be found and react when you are contacted on a recall. Monitor the Safety Gate system, which contains information on recalled or banned products. Any safety issue that is identified should be always reported to the competent MSA.

**Disposing of packaging.** Pay attention to the plastic packaging, and keep it away from children. It presents suffocation risks if it is not disposed of correctly.

### For EOs

**Be aware of your obligations under applicable legislation.** Take all necessary precautions to ensure that the products fully comply with the requirements of the GPSD. EN 12790 for reclined cradles and EN 16232 for infant swings provide reliable technical solutions that manufacturers can follow during the design and production of a product to demonstrate their compliance with the mandatory legal requirements. The instructions provided with the products should be correct, clearly illustrated and translated into the national languages of the country of sale.

**Recalls.** Clearly communicate with consumers on how they should register the products they purchase so they will receive information on possible recall actions. Make recall notices clear and accessible, and always indicate the hazards posed by the product. Regularly monitor the impact of a recall and adjust the strategy accordingly.

### For standardisation organisations

**Chemical testing.** All the reclined cradles met the requirements of the chemical tests, but two baby swings did not. However, EN 16232:2013 + A1:2018 on infant swings entails much more extensive chemical testing (and includes tests for formaldehyde, colourants, primary aromatic amines and aniline) than EN 12790:2009 (for reclined cradles). EN 12790:2009 should be revised to include also the chemical tests foreseen in EN 16232:2013.

#### **Distinction between reclined cradles and baby swings.**

The applicable standards should include a definition, which allows for a clear distinction between the two product types. Several products tested in this PSA were clearly marketed and sold as swings even though they were manufactured based on the reclined cradle standard. In the definition included in EN 12790:2009, there is no reference to the movement of the product nor to the fact that the movement is created by the child.

### For European and national authorities

#### **Keep reclined cradles and baby swings under surveillance.**

Considering that almost half of the products sampled and tested in this activity did not meet at least one of the requirements included in the testing plans, these product categories should be kept under surveillance (perform tests, check the warnings, markings and instructions, and engage with the EOs).

**Engage with standardisation organisations.** The MSAs and the European Commission should engage with the relevant committees from the European standardisation organisations in order to improve the safety of these products (and also use the results of tests conducted by individual MSAs or during coordinated activities). Monitor the publication of new versions of relevant standards. The European Committee for Standardization is currently working on EN 12790-1:2020, its publication is expected in the second half of 2022.

# 1. What is CASP?

The Coordinated Activities on the Safety of Products (CASP) enable Market Surveillance Authorities (MSAs) from EU/EEA countries to cooperate and to reinforce the safety of products placed on the Single Market.

**Product-specific activities (PSAs)** test different types of products that may pose a risk to consumers. The products are selected and collected by the MSAs involved and are examined using a commonly agreed testing plan.

**Horizontal activities (HAs)** provide a forum for MSAs to exchange ideas and best practices. Under the guidance of a technical expert, they develop common approaches, procedures and practical tools for market surveillance.

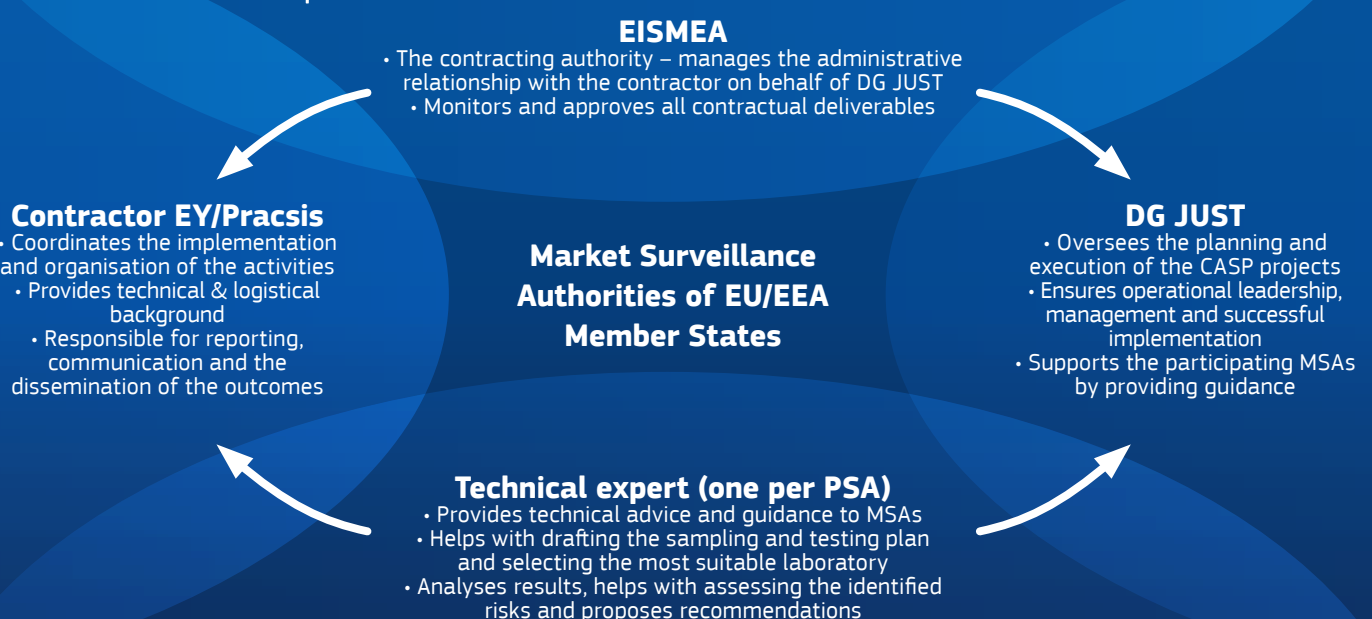
**Hybrid activities** facilitate horizontal discussions and conduct testing campaigns. The results are used to develop common approaches and methodologies.

**CASP 2021 includes five PSAs, three HAs and one hybrid activity. They were pre-selected by the participating MSAs through a consultation organised by DG JUST.**

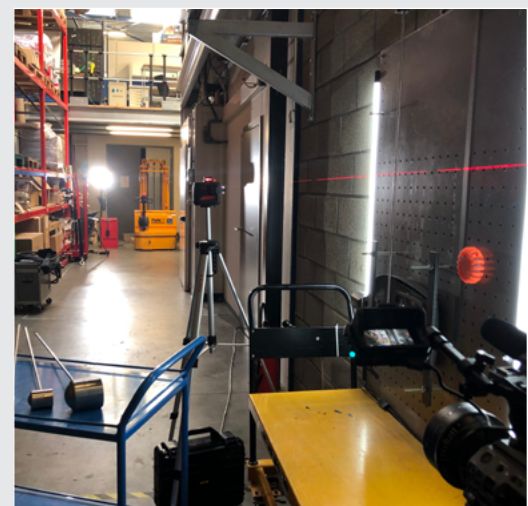
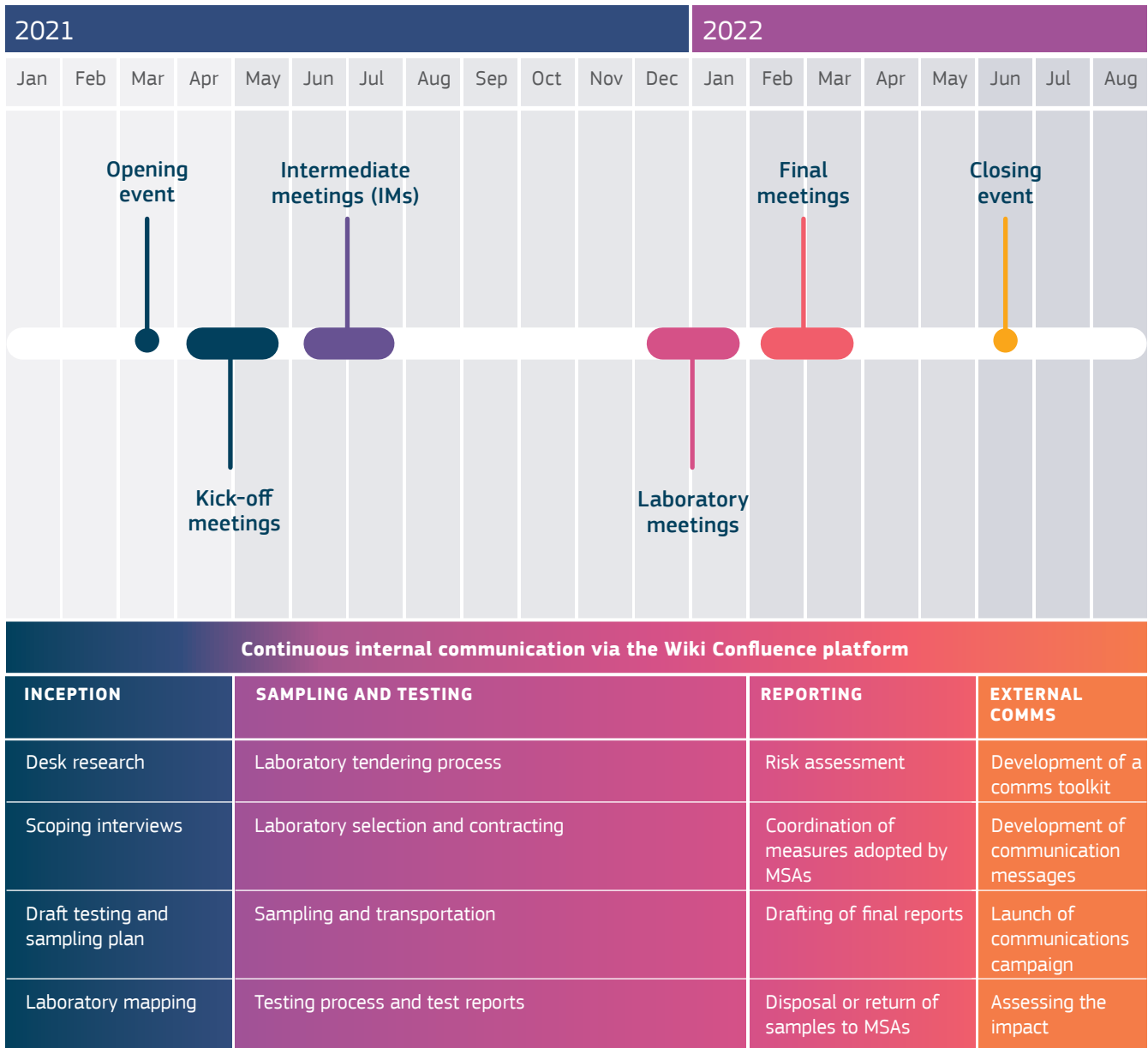
## Product-specific activities (PSAs)



## Roles and responsibilities



# 2. PSA work plan



# 3. PSA Tools & processes





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