EN

European Commission

CASP2022

Coordinated Activities on the Safety of Products

Baby strollers Final Report

Justice and Consumers

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List of abbreviations

ABBREVIATION	DESCRIPTION
DG JUST	Directorate-General for Justice and Consumers
EN	European Standard
EU	European Union
GPSD	General Product Safety Directive (2001/95/EC)
MSA	Market surveillance authority
PSA	Product-specific activity
RAG	Risk Assessment Guidelines
The RAPEX Guidelines	Decision (EU) 2019/417

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 baby strollers. The products were sampled and tested following the commonly agreed criteria in a European laboratory selected by participating MSAs.

Product scope

Pushchairs and prams up to 15 kg each including any integrated platform on which a child (up to 20 kg) can stand, as covered by EN 1888-1.

Main testing criteria

The testing plan included a selection of clauses from the European Standard (EN) 1888-1:2018 focusing on mechanical hazards and the durability of markings.

Additional tests under EN 1466:2014 were used to assess features such as a harness system or carrying handle(s) for strollers that can be converted from seats to pram bodies.

Results

- Out of 73 strollers, 29 met all the technical requirements of the testing plan, with 44 samples not having met at least one of the technical requirements of the testing plan.
- A considerable number of strollers did not meet the requirements of Clauses 8.1 Protective function (15 samples), 8.3 Hazards from moving parts (14 samples) and 8.10 Structural integrity (29 samples).
- In total, 44 of the samples did not meet the requirements on warnings, markings and instructions.

Key recommendations

For consumers

- Read the warnings and safety instructions, which must be in the correct national language(s).
- Before using a stroller, ensure that the restraint system is secure and attached effectively.
- Whenever possible, register a stroller and sign up to receive recall information. Stop using a recalled product immediately and follow recall instructions.

For economic operators

- Ensure that strollers are designed and manufactured in compliance with the provisions of the General Product Safety Directive (2001/95/EC) and the appropriate safety standards.

For national authorities

- Be aware of the different testing requirements for convertible strollers with several configuration options.

For standardisation organisations

- To facilitate safety checks of convertible strollers, EN 1888-1 should include tests for features such as a harness system or carrying handle(s).

Conclusions

- The test performed on strollers for this activity aimed at assessing the safety of both simple and convertible strollers, taking into account the additional testing requirements where necessary.
- Despite the large number of samples that did not meet the requirements of the applicable standards, the failures detected regarding the strollers point predominantly to quality issues, however not resulting in serious safety risks.
- Small design changes and a revision of the markings, warnings and instructions, in addition to internal structural integrity and stability testing, are recommended to ensure that products meet the testing requirements.
- Risk assessments performed by the MSAs showed that 10 samples presented a serious risk, three a high risk, six a medium risk and 22 a low risk. Among the main measures taken in relation to the products that did not meet the requirements, 15 products were withdrawn from the market, one product was recalled from the end user and a stop of sales was imposed on two products. Measures are still pending for several samples that did not meet the requirements.

1. Overview of the activity

1.1. Participating MSAs

Ten MSAs from ten EU Member States / EEA countries participated in the baby strollers product-specific activity (PSA).

Table 1 - **List of participating MSAs**

COUNTRY	MSA
Austria	Federal Ministry of Social Affairs, Health, Care and Consumer Protection
Belgium	Federal Public Service Economy - Directorate General Quality and Safety
Bulgaria	Commission for Consumer Protection
Croatia	State Inspectorate
Czechia	Czech Trade Inspection Authority
Germany	District Government of Cologne
Iceland	Housing and Construction Authority
Latvia	Consumer Rights Protection Centre
Malta	Malta Competition and Consumer Affairs Authority
Portugal	Consumer Directorate-General

1.2. Product scope and testing criteria

1.2.1. Product scope

The MSAs agreed to limit the scope of this activity to pushchairs and prams for children up to 15 kg (including any integrated platform on which a child of up to 20 kg can stand) covered by EN 1888-1.
The MSAs where free to decide whether to sample simple strollers or strollers that allowed for several configurations of the seat. Four categories were identified and sampled: fixed seat strollers; duo or reversible seat strollers; system (trio or more configurations) strollers; strollers with more than nine configurations.

FIXED SEAT STROLLER

DUO OR REVERSIBLE STROLLER

SYSTEM STROLLER (TRIO OR MORE CONFIGURATIONS)

MORE THAN 9 CONFIGURATIONS

1.2.2. Testing criteria

The testing plan included both mechanical (Clause 8-8.10) and durability of markings tests (Clause 9) based on the requirements of EN 1888-1:2018 Child use and care articles – wheeled child conveyances; Part I pushchairs and prams.

Though EN 1888-1:2018 has been revised, and in 2022 an amended version (EN 1888-1:2018+A1:2022) was published, the MSAs agreed to use the 2018 version as the 2022 version only came into effect after 31 October 2022 and most of the strollers sampled were expected to be placed on the market before and marked as being in compliance with the 2018 version.

Moreover, the laboratory found that some of the sampled strollers can be converted from seats to pram bodies. As this function is not properly addressed in EN 1888-1, for 11 strollers the MSAs decided to complement the original testing plan with additional tests, using EN 1466:2014, on carry cots and stands to assess features like the presence of a harness system or carrying handle(s) for convertible strollers.

In addition to the laboratory tests, the MSAs also checked the accompanying warnings, markings and instructions in their national language(s). A checklist with the main requirements was prepared by the technical expert to provide additional guidance for the MSAs.

2. Sampling and testing

2.1. Sampling distribution and sampling channels

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.

In total, 73 samples were collected by the MSAs and sent to the laboratory for testing. The samples included 54 fixed seat strollers, 14 duo or reversible seat strollers, four system strollers with three or more configurations and one stroller that allowed for 9 or more different configurations.

The MSAs could choose their preferred sampling channels and collect the products both online and in physical shops. In total, 52 strollers were sampled from physical shops while 21 strollers were purchased online.

Table 2 - **Number of samples collected by participating MSAs**

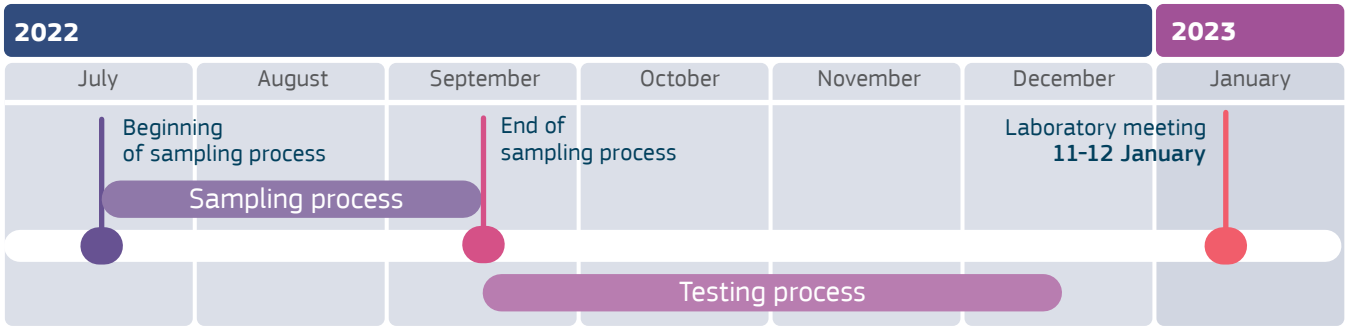
COUNTRY	MSA	FIXED SEAT STROLLERS	DUO OR REVERSIBLE SEAT STROLLERS	SYSTEM (TRIO OR MORE CONFIGURATION) STROLLERS	STROLLERS WITH 9 OR MORE CONFIGURATIONS
Austria	Federal Ministry of Social Affairs, Health, Care and Consumer Protection	3	1	-	1
Belgium	Federal Public Service Economy – Directorate General Quality and Safety	6	4	-	-
Bulgaria	Commission for Consumer Protection	7	2	2	-
Croatia	State Inspectorate	4	-	-	-
Czechia	Czech Trade Inspection Authority	2	5	-	-
Germany	District Government of Cologne	5	1	2	-
Iceland	Housing and Construction Authority	8	-	-	-
Latvia	Consumer Rights Protection Centre	5	1	-	-
Malta	Malta Competition and Consumer Affairs Authority	8	-	-	-
Portugal	Consumer Directorate-General	6	-	-	-
	TOTAL	54	14	4	1

2.2. Testing process

The testing laboratory for this activity was selected through a tender procedure, launched in June 2022. The tender specifications were sent to 73 laboratories in the EU/EEA that had been identified following the project's laboratory engagement strategy.
Each laboratory was asked to submit an offer including the elements mentioned in the tendering document, such as detailed information on pricing and supporting documents supplying evidence of certification, the relevant experience of the experts and test reports.
Six laboratories submitted an offer within the given timeframe.
Based on the completeness and competitiveness of the offer, four laboratories were pre-selected and invited to an interview to further discuss their offer. During the intermediate meeting the MSAs were presented with comparative analyses of the technical quality and financial aspects of the offers received from the laboratories.
The MSAs selected the laboratory that was awarded the highest number of final points based on the quality and financial competitiveness of their offer.

Following the selection of the laboratory, the MSAs were given two months to collect the samples and send them to the laboratory. The sampling process was extended to allow the MSAs to sample additional products. The testing process encountered no delays and was completed on 21 December 2022. The Laboratory meeting took place on 11 and 12 January 2023.

Figure 1 - **Timeline of the sampling and testing process**



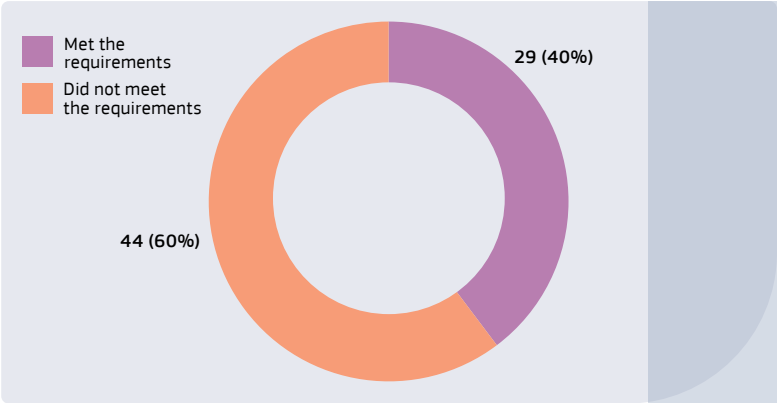
3. Test results

3.1. Overview of the test results and main findings

A total of 29 (40%) of the 73 samples tested by the laboratory met the requirements defined in the final testing plan, as shown in *Figure 2*. The remaining 44 samples (60%) did not meet the requirements of EN 1888-1:2018 and EN 1466:2014.

In addition to EN 1888-1:2018, 11 samples were tested according to EN 1466. In total, four out of the 11 samples were tested only in relation to the clause on the protective function (restraint system) as they were out of the scope of EN 1466:2014 but presented the same hazard. Out of the 11 products tested, five (45%) did not meet the relevant requirements.

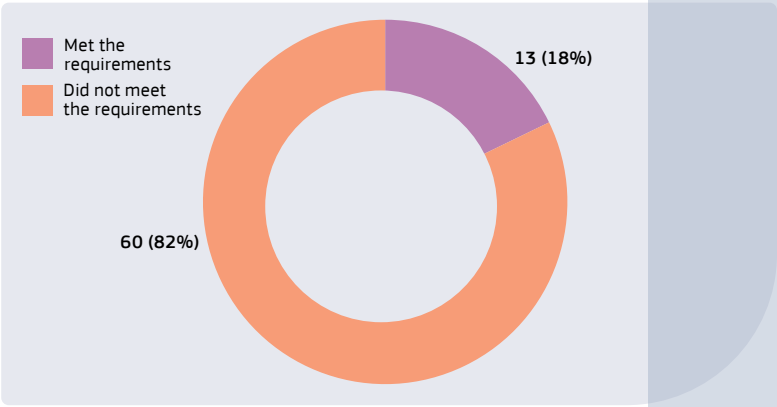
Figure 2 - **Overall test results (excluding warnings, markings and instructions) (N=73)**



The MSAs' checks on the warnings, markings and instructions showed that 44 (60%) of the samples did not meet the requirements. The main reasons included missing warnings and information as well as the product information not being provided in the official language(s) of the Member State.

If we consider both the tests performed by the laboratory and the warnings, markings and instruction checks performed by the MSAs, a total of 60 samples did not meet at least one of the requirements.

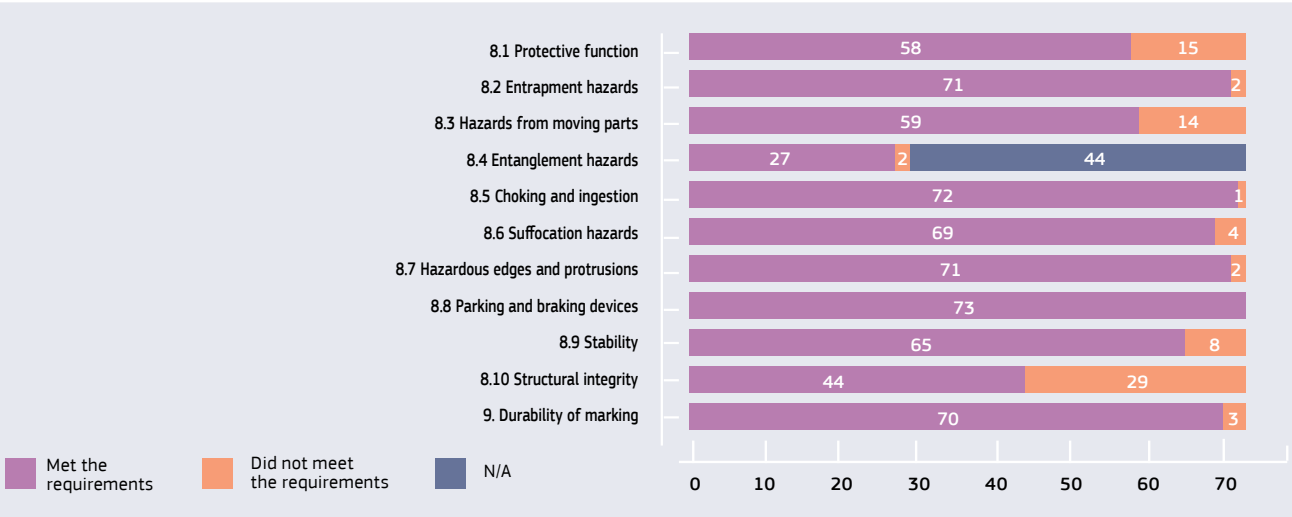
Figure 3 - **Overall tests results (including warnings, markings and instructions) (N=73)**



3.2. Results per clause

Looking at the results per clause of EN 1888-1:2018, clauses with a particularly large number of samples that did not meet the requirements included Clause 8.10 (Structural integrity) as well as Clauses 8.1 (Protective function) and 8.3 (Hazards from moving parts). *Figure 4* provides an overview of the results per clause of EN 1888-1:2018.

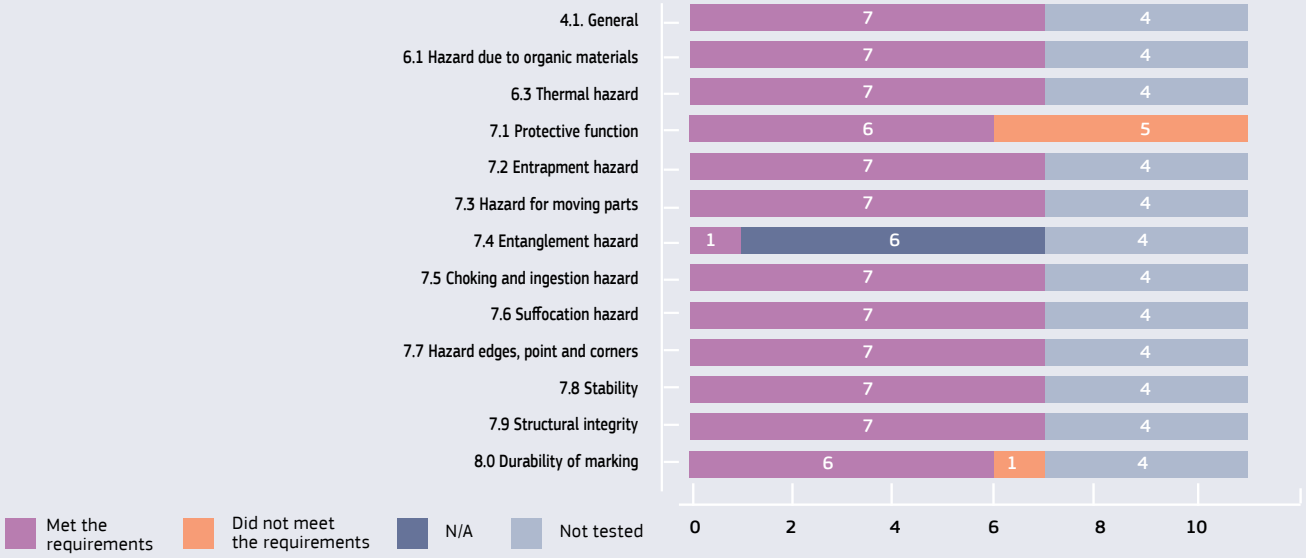
Figure 4 - **Test results per clause of EN 1888-1:2018 (N=73)**



Looking at the results per clause of EN 1466:2014, Clause 7.1 (Protective function) was the main reason that samples did not meet the requirements. Only one sample did not meet the requirements of Clause 8.0 (Durability of marking).

An examination of the failure rates of strollers from different sampling channels showed that strollers sampled from physical shops had a slightly higher failure rate than those sampled online (58% compared to 50%), keeping in mind that only 21 products were sampled online overall.

Figure 5 - **Test results per clause of EN 1466:2014 (N=11)**



3.3. Conclusions on the test results

Mechanical tests

Overall, the test results showed that a large number of strollers did not meet the requirements of the applicable standards. With regard to the mechanical failures, nearly 40% of the strollers did not meet the requirements of Clause 8.10 on structural integrity, as key parts, such as the front and rivet support, broke during the endurance test. Other clauses that revealed high failure rates include Clause 8.1 assessing the protective function (strollers not being suitable from birth as advertised, inadequate restraint systems for the advertised child weight, waist restraint being torn and adjustable straps slipping too much) and Clause 8.3 assessing hazards on moving parts (inadequate locking mechanisms, compression point on joints of leg rest and having only two operation devices instead of the required three).

Despite the large number of samples not meeting the requirements, the detected failures point predominantly to quality issues, however not resulting in serious safety risks. Only a few hazards related to choking and ingestion (Clause 8.5) and suffocation (Clause 8.6) were detected, and all strollers met the requirements of Clause 8.8 on parking and braking devices.

Warnings, markings and instructions

In addition to the mechanical test, the MSAs' checks on the warnings, markings and instructions indicated common shortcomings related to missing warnings and information as well as the product information not being provided in the official language(s) of the Member State.

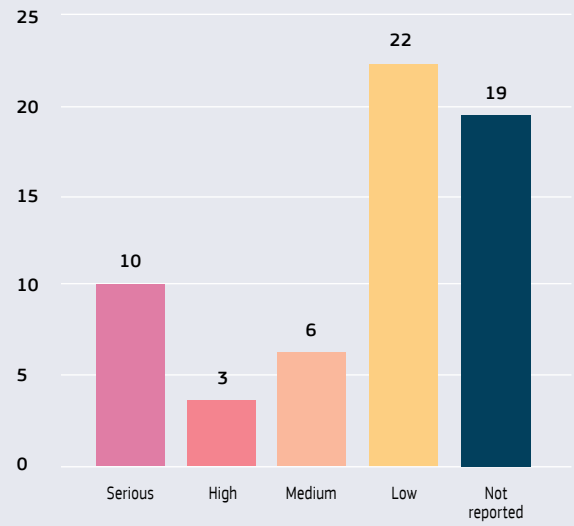
Some of the products were not marked in compliance with EN 1888-1:2018 or EN 1466:2014, or included compliance claims regarding previous versions of the standards.

4. Risk assessments and measures

4.1. Risk assessments results

According to the GPSD[1], a product has to be safe during its foreseeable use throughout its whole life[2]. 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 (the RAPEX Guidelines)[3]. To develop the risk assessments, the MSAs used the Risk Assessment Guidelines (RAG) tool[4] managed by the European Commission. *Figure 6* shows the risk levels (based on the risk assessments performed by the MSAs) of the 60 samples that did not meet at least one of the requirements (laboratory testing or checks performed by the MSAs on warnings, markings and instructions).

Figure 6- **Overview of risk levels of samples that did not meet the requirements (N=60)**



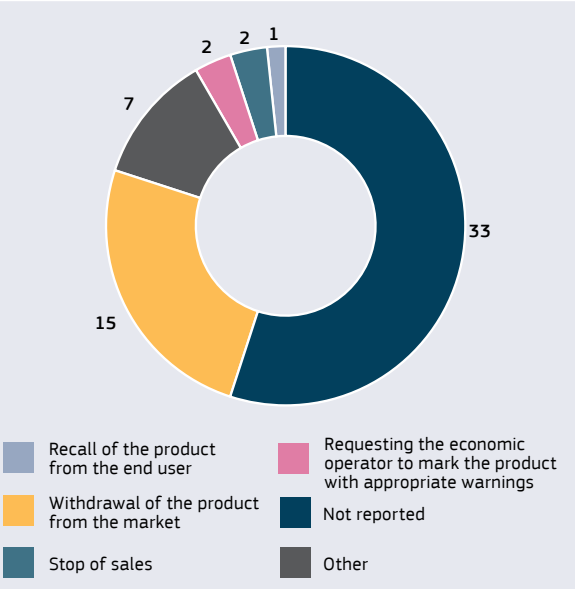
4.2. Corrective measures

Based on the test results and the risk assessments performed, the MSAs decide which measures have to be taken regarding the products that did not meet the requirements of the applicable standards designed to stop dangerous products from appearing on the Single Market.

Figure 7 displays the corrective measures taken for the products that did not meet the requirements.

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). The RAPEX Guidelines also recommend submitting notifications on measures taken against products posing a less than serious risk. Following the actions triggered by the joint testing campaign (up to 14 April 2023), nine products were subject to Safety Gate notifications (notification for one product is still pending).

Figure 7 - **Measures adopted for samples that did not meet the requirements (N=60)**



[1] EUR-Lex - 32001L0095 - EN - EUR-Lex (europa.eu)
[2] The Regulation (EU) 2023/988 on general product safety has been published in the Official Journal on 23 May 2023: EUR-Lex - 32023R0988 - EN - EUR-Lex (europa.eu). It enters into force on 12 June 2023 and into application on 13 December 2024.
[3] https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=LEGISSUM%3A4390682
[4] RAG ECL V10 (europa.eu)

5. Conclusions and recommendations

5.1. Conclusions

In the absence of any sector-specific legislation for baby strollers, manufacturers can voluntarily mark their products as being in compliance with the existing standards. The test performed on strollers for this activity aimed at assessing the safety in general of the different configurations of the strollers based on both mechanical tests and on the checks on warnings, markings and instructions.

Despite the large number of samples that did not meet the requirements of the applicable standards, the failures detected point predominantly to quality issues, however not resulting in serious safety risks. Certain features, such as long straps, loops or non-compliant locking mechanisms, can be corrected by small design changes. Revisions in the warnings, markings and instructions, including the age grading, are also recommended to ensure strollers meet the requirements of the relevant standards.

Consumers are advised to always check conformity labels and read warnings and safety instructions for strollers, while economic operators are encouraged to conduct safety tests for stability and strength.

The activity has also highlighted areas for improvements in the standardisation of safety requirements for strollers. In order to facilitate the risk assessment of convertible strollers according to EN 1888-1, the standard should cover features like the presence of a harness system or carrying handle(s), which can currently only be tested using EN 1466.

MSAs issued nine Safety Gate notifications based on the outcome of this PSA (one notification is still pending) and asked the economic operators to withdraw or recall the products from the market, or stop the sale when the products were assessed as posing serious, high or medium risk.

5.2. Recommendations for stakeholders

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

For consumers

- **Read warnings and safety instructions - which must be in your own national language(s).** Also, check for information on the name, trademark or other means of identification of the manufacturer and/or importer responsible for the product's sale. Assess important information on age-appropriate strollers before the product is purchased.
- Before using a stroller, **ensure that the restraint system is secure and attached effectively.** Check that the child is and remains effectively secured. Also check the operating devices/locking mechanism.
- Check strollers for labels that state their conformity to the safety standard **EN 1888**. Labels can usually be found on the frame or on the seat pad.
- Where available, **register your stroller** and sign up to receive product recall information. Stop using a recalled product immediately and follow recall instructions.
- Check the **EU's Safety Gate system** (https://ec.europa.eu/safety-gate-alerts/screen/webReport) for any strollers that may have been recalled on safety grounds.

For European and national authorities

- Be aware of the different testing requirements of convertible strollers with several configuration options.

For economic operators

- Before placing strollers on the market, ensure that they are designed and manufactured in compliance with the **GPSD**, and with the appropriate **safety standard (EN 1888).** Safety obligations are also imposed on **economic operators** in the supply chain.
- Be aware of **legislation changes** in light of the publication of the General Product Safety Regulation (EU) 2023/988 to replace the GPSD.
- **Conduct significant internal tests for stability and strength.** Engage with accredited testing laboratories to ensure the safety of strollers.
- **Traceability of products is a mandatory requirement.** Such requirements are important in case strollers need to be recalled. All strollers should be marked with a type, batch, serial or model number or other marking allowing their identification. Clearly communicate how consumers should participate in **recalls.**
- Strollers have particular identified hazards and should have warnings specific to these e.g. **"WARNING Always use the restraint system" and "WARNING Ensure that all the locking devices are engaged before use."**
- If a stroller presents a safety risk, economic operators have a legal duty to immediately **inform the competent authority** of the Member State(s) in which the stroller has been made available. One way to do this is to use the Product Safety Business Alert Gateway.

For standardisation organisations

- The **convertible functions of strollers are not properly addressed in EN 1888-1** and some requirements, like the presence of a harness system or carrying handle(s) can be assessed only using EN 1466. To facilitate safety checks of convertible strollers, EN1888-1 should include these **requirements**.
- Interpretation of testing of the restraint system (Clause 8.1.3.2.4. Effectiveness of the adjustment system) and of the locking mechanism (Clause 8.3.5.1.1.3 Unintentional release of locking mechanism) is unclear and requires further clarification.

1. What is CASP?

The Coordinated Activities on the Safety of Products (CASP) enable market surveillance authorities from European Union / European Economic Area countries to cooperate and to reinforce the safety of products placed on the Single Market.

CASP 2022 includes six product-specific activities and four horizontal activities

Product-specific activities test different types of products that may pose a risk to consumers. The products are selected and collected by the market surveillance authorities involved and are examined using a commonly agreed testing plan.

Toys with magnets | **Chemicals in toys** | **Baby strollers** | **Ozone air purifiers and sterilisers** | **Travel adaptors** | **Hygiene products**

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

Communication booster | **Risk assessment and management** | **Online market surveillance** | **Goods and products sold at street markets**

Roles and responsibilities

EISMEA
- The contracting authority – manages the administrative relationship with the contractor on behalf of DG JUST
- Monitors and approves all contractual deliverables

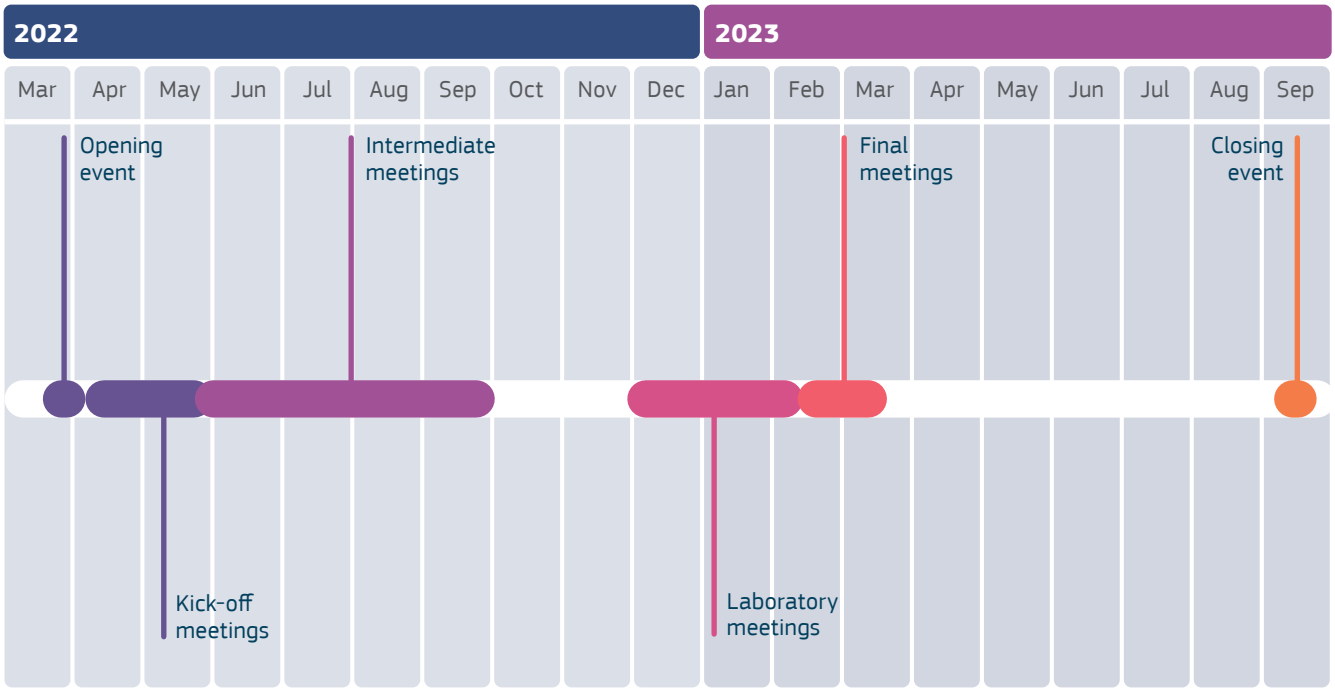
Contractor EY/Pracsis
- Coordinates the implementation and organisation of the activities
- Provides technical & logistical background
- Responsible for reporting, communication and the dissemination of the outcomes

Market Surveillance Authorities of European Union / European Economic Area Member States

DG JUST
- Oversees the planning and execution of the CASP projects
- Ensures operational leadership, management and successful implementation
- Supports the participating market surveillance authorities by providing guidance

Technical expert (one per product-specific activity)
- Provides technical advice and guidance to market surveillance authorities
- Helps with drafting the sampling and testing plan and selecting the most suitable laboratory
- Analyses results, helps with assessing the identified risks and proposes recommendations

2. Product-specific activities work plan



Continuous internal communication via the Wiki Confluence platform

INCEPTION	SAMPLING AND TESTING	REPORTING	EXTERNAL COMMS
Desk research	Laboratory tendering process	Risk assessment	Development of a comms toolkit
Scoping interviews	Laboratory selection and contracting	Coordination of measures adopted by market surveillance authorities	Development of communication messages
Draft testing and sampling plan	Sampling and transportation	Drafting of final reports	Launch of communications campaign
Laboratory mapping	Testing process and test reports	Disposal or return of samples to market surveillance authorities	Assessing the impact

3. Product-specific activities tools & processes

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Pre-CASP process
DG JUST conducts a priority-setting exercise to select the product categories.
The six CASP 2022 product categories were selected by the participating market surveillance authorities through a consultation organised by DG JUST.

1

Validation of the testing and sampling plans
The technical experts draft the plans based on market surveillance authority feedback and the available budget. The drafts are presented at the kick off meeting, then finetuned and validated by the market surveillance authorities via the Wiki.

2

Laboratory selection
The contractor's team maps the laboratories and contacts them to collect prices and other information.
The tendering process is launched after the kick off meeting, and the offers are evaluated.
During the intermediate meetings, the participating market surveillance authorities decide which laboratory to select.

3

Collection and transportation of samples
The market surveillance authorities collect the relevant samples from their national markets and register them in a codification file. After performing preliminary checks, the market surveillance authorities send the samples to the laboratory.

4

Testing and delivery of test reports
The laboratory tests the samples according to the agreed testing plan and uploads the test reports to the Wiki. The market surveillance authorities ask for clarification if necessary, and approve the reports.

5

Risk assessment
The technical expert and the market surveillance authorities develop scenarios based on selected samples during the laboratory meeting and analyse the risks. Market surveillance authorities perform risk assessments on all samples that do not meet legal requirements.

6

Upload scenarios to the Risk Assessment Guidelines tool
The scenarios developed during the project are uploaded to the Risk Assessment Guidelines tool.

7

Measures adopted by the market surveillance authorities
The market surveillance authorities take appropriate measures on the products in question and report them on Safety Gate.

8

External communications
The external communication activities are launched at the closing event. This will be followed by a 2–3-week pan-European communications campaign.

Tools

Audio-visual clips addressed to consumers and a general audience are produced for each product-specific activity and the overall CASP 2022 project.
Infographics addressed to economic operators are developed for the CASP 2022 project, for each product-specific activity.
Final reports are produced for each activity and for the CASP 2022 project. They are translated into all official EU languages plus Norwegian and Icelandic.

Channels

The communication material is disseminated using:

- The EC CASP website
- Market surveillance authorities national communication channels
- Relevant press and other stakeholders

EUROPEAN COMMISSION
Directorate-General for Justice and Consumers
Directorate Consumers
Unit E.4 Product Safety and Rapid Alert System
Email: *JUST-RAPEX@ec.europa.eu*

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