



Study on the promotion of the use of RAPEX information by importers, distributors and retailers in the field of consumer product safety, with a particular focus on SMEs

Final report

Written by Civic Consulting of the Consumer Policy Evaluation Consortium
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ABSTRACT

The study on the promotion of the use of RAPEX information by importers, distributors and retailers has the objective to provide an overview of the way how a target group of economic operators purchases goods, with a particular focus on if and how they use product safety information available on the RAPEX website to monitor whether the products they sell or import are safe. Based on data collected amongst importers, distributors and retailers in five target sectors (toys, clothing/fashion, cosmetics, electrical appliances, childcare articles) the study analyses (i) purchasing strategies of companies, (ii) their approaches to ensure product safety, (iii) their awareness of the RAPEX website, and (iv) their suggestions for promoting the use of RAPEX information. The analysis reveals that for increasing the uptake of the RAPEX website by economic operators three different target audiences need to be considered: regular users, unaware non-users, and reluctant non-users. Targeted actions and key messages addressing the distinct needs and expectations of each target audience are developed. The study concludes with two broad recommendations for promoting the use of RAPEX information. The first set of recommendations relates to the improvement and re-design of the RAPEX website. The second set of recommendations refers to awareness raising activities and the involvement of stakeholders.

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1. EXECUTIVE SUMMARY

The EU Rapid Alert System for dangerous non-food products (RAPEX) is generally considered as one of the success stories of the EU. Its 10-year anniversary gave impetus for the European Commission to examine opportunities for broadening its use with a view to further increasing the health and safety of European consumers. One action identified was to promote the use of the publicly available RAPEX information amongst economic operators as a business tool to ensure product safety.

It is against this background that the study on the promotion of the use of RAPEX information by importers, distributors and retailers in the field of consumer product safety, with a particular focus on SMEs was commissioned to Civic Consulting of the Consumer Policy Evaluation Consortium (CPEC). The objective of this study is to provide an overview of the way how a target group of economic operators (importers, distributors, retailers) purchases goods, with a particular focus on if and how they use product safety information to monitor whether the products they sell or import are safe.

For the research, three methodological tools were employed. First, a structured mapping exercise identified a balanced sample of targeted economic operators across countries and sectors. Second, by means of a survey evidence on the use of RAPEX information by economic operators was collected. And third, in interviews a more detailed perspective of this use was gathered. Research took place between December 2014 and July 2015. Data was collected amongst importers, distributors and retailers in five target sectors (toys, clothing, electrical appliances, cosmetics and childcare articles), and focused specifically on small and medium sized enterprises (SMEs). It covered 14 EU Member States representing all geographic regions of the EU and more than two thirds of the EU population.

RESULTS OF THE RESEARCH

Based on the data collected amongst a total of 94 survey respondent and 49 interviewees, the study analysed the purchasing strategies of companies, their approaches to ensure product safety, the awareness of the RAPEX website and suggestions for promoting its use. It concluded with the following key findings.

PURCHASING STRATEGIES OF COMPANIES

For the *identification* of new products, companies preferably use three strategies: the identification of products at trade fairs, through manufacturers and through sales agents. Internet-based tools, such as researching blogs, competitor's websites and B2B online platforms, seem to be less relevant. For the *purchase* of products, personal business relationships are particularly important. Companies buy products directly from the manufacturer, through sales agents and from wholesalers. Again, internet-based approaches are rather of minor importance.

APPROACHES OF COMPANIES TO ENSURE PRODUCT SAFETY

Large and medium size companies invest a considerable amount of resources in product safety and quality management processes. On the contrary, micro-sized and small businesses tend to rely on their business partners to ensure product safety. These companies often only buy products from "trusted suppliers" e.g. well-known brands, which are expected to already have sufficient internal quality procedures in place.

Internet-based approaches for ensuring product safety, such as researching the websites of national authorities or business associations are of minor importance. However, amongst these resources the RAPEX website is the most relevant one.

AWARENESS OF RAPEX

In the survey, 66% of the respondents are well aware of RAPEX, as they visit the RAPEX website sometimes, once a month, or once a week. 34% of the survey respondents are less aware of RAPEX, as prior to the study they did not know about RAPEX at all or had heard about RAPEX but had never or only once visited the website before. Amongst small and micro size companies the share of companies less aware of RAPEX increases to 49%. Awareness amongst interviewees is very mixed. Some use the RAPEX website regularly many others have never heard of it before.

In terms of purposes to use the RAPEX website, differences in the perception can be noted between companies well aware and companies less aware of the RAPEX website. Companies well aware of the RAPEX website use it to monitor product safety developments in the sector, i.e. to systematically review RAPEX information regarding the types of products and the types of hazards often notified. Companies less aware of the RAPEX website understand the website (when introduced to it) rather as a tool to check individual products which either are already included or considered to be added to their product range.

UPTAKE OF THE RAPEX WEBSITE

According to economic operators, the main limitations to currently using the RAPEX website are that it is too time-consuming/not practical to use, the data base is too broad making it cumbersome to identify relevant information, the information is difficult to comprehend or not relevant for the company's operations, and that national authorities appear to be more trustworthy than European initiatives. A variety of improvements relating to the content and functionality of the RAPEX website would overcome these limitations. Furthermore, research revealed that for the effective promotion of the RAPEX website, general awareness regarding product safety needs to be increased, in particular among micro-sized and small companies.

TARGET AUDIENCES TO CONSIDER WHEN PROMOTING THE RAPEX WEBSITE

Among companies, there exists a considerable difference in the level of awareness of product safety in general and RAPEX in particular, resulting in different needs and expectations towards the RAPEX website. Three distinct target audiences worth considering when promoting RAPEX information can be identified: regular users, unaware non-users, and reluctant non-users.

Regular users visit the RAPEX website routinely in order to get informed about new product safety developments in their sector. Typically, large or medium-sized companies as well as business associations belong to this target audience. They have the capacity and willingness to dedicate a considerable amount of time to product safety and quality management and use the RAPEX website as an important source for monitoring their sector.

Unaware non-users claim that they never heard of RAPEX before. In particular small and micro-size companies belong to this target audience. One reason for this lack of awareness seemingly coincides with the companies' trust of their business partners in terms of product safety. Another critical factor relates to the lack of awareness of product

safety in general terms. However, unaware non-users were open to learn about the RAPEX website and appreciate assistance in product safety issues. They have a considerable potential to develop into regular RAPEX users.

Reluctant non-users are aware of the RAPEX website but do not use it. Businesses belonging to this target audience can be found amongst small as well as medium-sized and large companies. Reasons for the reluctance to use the RAPEX website include limited resources, lack of knowledge on product safety in general and reliance on business partners. In addition, this group encompasses companies that do not have a proper understanding of the RAPEX website, that prefer to rely on national authorities, or that are dissatisfied after having used the RAPEX website.

STRATEGIES FOR ADDRESSING TARGET AUDIENCES

Given the difference in knowledge about and expectations towards the RAPEX website, strategies to reach out to individual target audiences may differ.

Even though *regular users* consider the RAPEX website useful as a one-stop system for unsafe products on the European market, they stressed that it has not yet reached its full potential. To be a genuinely valuable tool of quality management and for monitoring the market, further improvements to the website are required. Actions to address this target audience, therefore, should focus on the one hand on improving the RAPEX website and on the other hand on continued monitoring of user satisfaction.

Given that *unaware non-users* are to a large extent micro-size and small companies that explicitly delegate the responsibility for product safety to business partners, a two-step approach is recommended. First, awareness-raising measures focussing on the importance of product safety in general is needed in order to alert unaware non-users of their duties. Second, specific information on the RAPEX website, its potential and how to use it can be provided. For the successful implementation of this approach it is crucial to involve business associations and other stakeholders.

Reluctant non-users may be the most difficult target audience to reach due to the diverging reasons leading them to neglect the RAPEX website. Those with misperceptions might be resistant to learn about the RAPEX website. Nonetheless, providing specific information on the RAPEX website, its potential and how to use it is indispensable for convincing this group of companies of the usefulness of RAPEX information. For greater outreach a variety of communication channels should be used and different stakeholders need to be involved. The needs of reluctant non-users dissatisfied with the functioning of the RAPEX website are addressed through improvements which distinctively reflect the users' feedback. Companies have to be reassured that their suggestions and feedback are taken into account. Finally, actions should focus on close collaboration with national authorities, given the trust many businesses in this target audience have in them. Information distributed by these trusted stakeholders may convince companies that the RAPEX website is a helpful tool for identifying unsafe products.

RECOMMENDATIONS FOR PROMOTING THE USE OF RAPEX INFORMATION

Two broad recommendations for the European Commission derive from the analysis of the target audiences, their needs and expectations. The implementation of these recommendations depends on available resources and may be limited by stipulations of the legal framework.

SET OF RECOMMENDATIONS 1: IMPROVING THE RAPEX WEBSITE

The first set of recommendations relates to improvements to the RAPEX website. Optimising the RAPEX website is of paramount importance for improving the use of RAPEX information by regular users. Enhanced usability, furthermore, reduces the barriers for unaware and reluctant non-users, as it helps these companies to immediately grasp the purpose and value of the RAPEX website, when visiting it.

The research revealed that a useful RAPEX website should be conceptualised as a *platform for businesses on product safety information* in general. Whilst the publication of RAPEX notifications is appreciated, the RAPEX website could, furthermore, offer guidance on product safety such as step-by-step guides on the legal obligations of economic operators. Hence, it is recommended to consider broadening the scope of the website and to optimise it in a wider perspective not limited to mere changes of its current features. While the development of a new website concept goes beyond the purposes of this study, the following suggestions may serve as a basis for the reorganisation:

- *Improvements in the design of the website*, including amongst others the provision of more focused information on the start page as well as the use of business oriented language and graphic clues;
- *Allowing clustering notifications by sector*, for example through an optimised search function;
- *More targeted email alerts*, for example by providing options to select topics of interest and the frequency of the alerts;
- *More information on the reason for notification, risk levels and risk assessment*, including the provision of a clear definition of the risk categories, comprehensive information on the reason for a notification and how the risk assessment has been conducted;
- Provision of *information for the identification of responsible manufacturers*; and
- Provision of *higher resolution photos*.

In addition to these suggestions, a reorganisation of the RAPEX website could include regular micro-surveys and a permanent online suggestion box with the view of monitoring user satisfaction and receiving constant user feedback.

SET OF RECOMMENDATIONS 2: AWARENESS-RAISING AND STAKEHOLDER INVOLVEMENT

The second set of recommendations for the promotion of the use of RAPEX information relates to awareness raising and stakeholder involvement activities. The research revealed knowledge gaps and misperceptions on product safety and the RAPEX website, in particular among unaware and reluctant non-users. To address these gaps a variety of information activities can be useful, which draw on communication channels that are embedded in the professional environment of companies. In this regard, close collaboration with stakeholders such as business associations is highly recommended. As a first step, a dialogue with relevant stakeholder organisations could be initiated *to discuss appropriate measures for improving awareness on product safety among small and micro-size businesses*. Such a dialogue would serve on the one hand to promote the possible use of the RAPEX website as a business tool amongst stakeholders and on the other hand to establish relationships with organisations that have the capacity to undertake further awareness raising actions among companies. The European Commission could support stakeholders in conducting awareness raising activities in a

variety of ways, including possibly through providing financial support. The following activities have been identified as potential tools for awareness raising:

- *Workshops*: Workshops on product safety and the use of the RAPEX website provide a platform for interested companies to engage in and learn about the topic. Stakeholders best placed for facilitating these workshops are business associations as they can draw on their members for participation. National authorities as well as the European Commission could contribute for example through presentations and the provision of educational materials.
- *Webinars*: In order to reach companies who are willing to actively engage but have limited resources, webinars are a good alternative. Economic operators can choose to watch webinars according to their own schedule and receive information they are interested in.
- *Newsletters*: Newsletters have the advantage to reach a much larger number of companies than workshops and webinars including also those who would not actively engage in the topic. The distribution of information materials, ready-made articles or press releases on product safety to organisations disseminating business newsletters could be considered.
- *Information at trade fairs*: In particular the event or workshop programme that accompanies trade fairs can provide a forum to reach out to a large number of businesses not actively involved in product safety. For this purpose, the European Commission could cooperate with business associations and other stakeholders already present at trade fairs or explore partnerships with the fair organisers.

Effective awareness raising needs to rely on a mix of communication tools. The above discussed activities are complementary in nature. Which activities are most suitable for the promotion of the RAPEX website depends on the identification of suitable partners for their implementation, and therefore on the outcome of the stakeholder dialogue suggested above.

2. SYNTHÈSE

Le Système européen d'alerte rapide pour les produits de consommation non alimentaires dangereux (RAPEX) est généralement considéré comme un exemple de réussite au sein de l'UE. À l'occasion de son 10ème anniversaire, la Commission européenne s'est penchée sur les perspectives d'élargissement de son utilisation, avec pour objectif d'améliorer encore la santé et la sécurité des consommateurs européens. Parmi les actions identifiées, l'une portait sur l'encouragement à utiliser les informations publiques RAPEX auprès des opérateurs économiques comme outil opérationnel assurant la sécurité des produits.

C'est dans ce contexte qu'a été commanditée, auprès de Civic Consulting, membre du Consumer Policy Evaluation Consortium (CPEC), l'étude sur la promotion de l'utilisation des informations RAPEX par les importateurs, distributeurs et détaillants dans le domaine de la sécurité des produits de consommation, en mettant un accent particulier sur les PME. Cette étude a pour objectif de fournir une vue d'ensemble sur la manière dont un groupe cible d'opérateurs économiques (importateurs, distributeurs, détaillants) procède à l'achat de marchandises, en s'intéressant en particulier au fait de savoir si ceux-ci utilisent les informations de sécurité des produits pour surveiller le caractère sûr des produits qu'ils vendent ou importent, et de quelle manière ils procèdent pour cela.

Ces recherches ont fait appel à trois outils méthodologiques. Tout d'abord, un exercice de mappage structuré a identifié un échantillon équilibré d'opérateurs économiques cibles sur l'ensemble des pays et secteurs. Ensuite, une enquête a permis de collecter des données quant à l'utilisation des informations RAPEX par les opérateurs économiques. Enfin, des entretiens ont débouché sur une mise en perspective plus détaillée de cette utilisation. Les recherches ont eu lieu entre décembre 2014 et juillet 2015. Les données ont été recueillies auprès d'importateurs, de distributeurs et de détaillants dans cinq secteurs cibles (jouets, habillement, appareillages électriques, produits cosmétiques, articles de puériculture), et ont porté spécifiquement sur les petites et moyennes entreprises (PME). Elles couvraient 14 États membres de l'UE représentant toutes les régions géographiques de l'UE et plus des deux-tiers de la population de l'UE.

RÉSULTATS DES RECHERCHES

Sur la base des données recueillies auprès de 94 répondants d'enquête et de 49 interviewés, l'étude a analysé les stratégies d'achat de sociétés, leur approche pour s'assurer de la sécurité des produits, leur sensibilisation quant au site Web RAPEX et les suggestions en vue d'encourager l'utilisation de ce dernier. Elle a abouti aux conclusions clés suivantes.

STRATÉGIES D'ACHAT DES SOCIÉTÉS

Concernant l'*identification* de nouveaux produits, les sociétés s'appuient de préférence sur trois stratégies : l'identification de produits dans des salons professionnels, par le biais de fabricants et par le biais de représentants de commerce. Les outils de l'Internet tels que la recherche dans des blogs, les sites Web de concurrents et des plateformes de commerce interentreprises en ligne, semblent moins pertinents. Pour l'*achat* de produits, les contacts commerciaux personnalisés revêtent une importance particulière. Les sociétés achètent les produits directement auprès du fabricant, par l'intermédiaire de représentants de commerce et de grossistes. Là encore, les approches reposant sur Internet revêtent relativement peu d'importance.

APPROCHES DES SOCIÉTÉS POUR ASSURER LA SÉCURITÉ DES PRODUITS

Les entreprises de grande et de moyenne tailles investissent une quantité considérable de ressources dans la sécurité des produits et les processus de gestion de la qualité. Les petites entreprises et les micro-entreprises ont quant à elles plutôt tendance à se fier à leurs partenaires commerciaux pour assurer la sécurité des produits. Ces sociétés achètent souvent uniquement des produits auprès de « fournisseurs de confiance », comme par exemple des marques reconnues, lesquels sont supposés avoir déjà mis en place des procédures de qualité internes suffisantes. Les approches reposant sur Internet pour assurer la sécurité des produits, telles que la recherche des sites Web des autorités nationales ou associations professionnelles, revêtent peu d'importance. Toutefois, parmi ces ressources, le site Web RAPEX s'avère être le plus pertinent.

SENSIBILISATION ENVERS LE SYSTÈME RAPEX

D'après l'enquête, 66 % des répondants s'avèrent bien sensibilisés quant au système RAPEX, puisqu'ils consultent son site Web parfois, une fois par mois, ou une fois par semaine. En revanche, 34 % des répondants de l'enquête sont moins sensibilisés au système RAPEX, puisqu'ils ne savaient rien à son sujet avant l'étude, ou ils avaient entendu parler du système RAPEX mais n'avaient jamais consulté le site auparavant, ou ne l'avaient consulté qu'une fois. Parmi les petites entreprises et micro-entreprises, la part des sociétés moins sensibilisées au système RAPEX passe à 49 %. Le niveau de sensibilisation au sein des interviewés diverge donc beaucoup. Certaines recourent au site Web RAPEX régulièrement, tandis que d'autres n'en avaient jamais entendu parler auparavant.

En termes de besoins d'utilisation du site Web RAPEX, des différences de perception peuvent être notées entre les sociétés affichant une sensibilisation élevée au système RAPEX et celles affichant une sensibilisation moindre. Les sociétés affichant une sensibilisation élevée au site Web RAPEX recourent à celui-ci pour surveiller les évolutions en matière de sécurité des produits dans le secteur, c'est-à-dire pour vérifier systématiquement les informations RAPEX concernant les types de produits et les types de dangers souvent notifiés. Les sociétés affichant une sensibilisation moindre au site Web RAPEX voient dans celui-ci (après qu'il leur a été présenté) plutôt un outil permettant de vérifier des produits individuels, soit déjà inclus dans leur gamme de produits, soit dont l'ajout est envisagé.

ACCEPTATION DU SITE WEB RAPEX

Selon les opérateurs économiques, les raisons limitant l'utilisation actuelle du site Web RAPEX sont liées au temps nécessaire à son utilisation et au manque de convivialité, au fait que la base de données s'avère trop générale, compliquant l'identification des informations pertinentes, que les informations sont difficiles à comprendre et inappropriées pour les activités commerciales, et enfin au fait que les autorités nationales semblent plus fiables que les initiatives européennes. Un certain nombre d'améliorations concernant le contenu et le fonctionnement du site Web RAPEX permettraient de surmonter ces limitations. Par ailleurs, les recherches ont révélé qu'en matière de promotion efficace du site Web RAPEX, il est nécessaire d'accroître la sensibilisation générale à la sécurité des produits, notamment parmi les petites entreprises et micro-entreprises.

PUBLICS CIBLES À ENVISAGER POUR LA PROMOTION DU SITE WEB RAPEX

Au sein des sociétés, il existe des différences considérables quant au niveau de sensibilisation à la sécurité des produits, en règle générale et en particulier quant au Web RAPEX, ceci débouchant sur des besoins et attentes divergents quant au site du RAPEX. En matière de promotion des informations RAPEX, il est possible d'identifier trois publics cibles principaux : les utilisateurs réguliers, les non-utilisateurs non sensibilisés, et les non-utilisateurs réticents.

Les *utilisateurs réguliers* consultent le site Web RAPEX fréquemment afin de suivre l'évolution en matière de sécurité des produits dans leur secteur. Les sociétés de moyenne à grande tailles ainsi que les associations professionnelles appartiennent à ce public cible. Elles ont la capacité et la volonté pour affecter une quantité considérable de temps à la sécurité des produits et à la gestion de la qualité, et recourent au site Web RAPEX comme source importante pour surveiller leur secteur.

Les *non-utilisateurs non sensibilisés* affirment n'avoir jamais entendu parler du système RAPEX auparavant. Les petites entreprises et micro-entreprises appartiennent particulièrement à ce public cible. Une raison de ce manque de sensibilisation semble être liée au niveau de confiance élevé qu'affichent ces sociétés envers leurs partenaires commerciaux en termes de sécurité des produits. Le manque de sensibilisation à la sécurité des produits dans son ensemble constitue un autre facteur critique. Toutefois, les non-utilisateurs non sensibilisés sont disposés à s'informer sur le site Web RAPEX et apprécient l'assistance proposée en matière de sécurité des produits. Leur passage dans le groupe des utilisateurs réguliers du système RAPEX est donc potentiellement considérable.

Les *non-utilisateurs réticents* sont sensibilisés au site Web RAPEX mais ne l'utilisent pas. Les sociétés appartenant à ce public cible peuvent autant faire partie des petites et moyennes entreprises que de grosses entreprises. Parmi les raisons expliquant cette réticence à utiliser le site Web RAPEX, on trouve des ressources limitées, un manque de connaissances sur la sécurité des produits en général, et la confiance envers les partenaires commerciaux. En outre, ce groupe comprend les sociétés n'ayant pas une compréhension correcte du site Web RAPEX, et qui préfèrent donc se fier aux autorités nationales, ou qui n'ont pas été satisfaites suite à l'utilisation du site.

STRATÉGIES D'APPROCHE DES PUBLICS CIBLES

Étant donné les divergences de connaissances et d'attentes envers le site Web RAPEX, les stratégies pour toucher des publics cibles distincts peuvent varier.

Bien que les *utilisateurs réguliers* considèrent le site Web RAPEX utile comme un système à guichet unique pour les produits dangereux sur le marché européen, ils soulignent que ce dernier n'a pas encore atteint son plein potentiel. Pour devenir un outil véritablement de valeur en matière de gestion de la qualité et de surveillance du marché, il est nécessaire d'apporter des améliorations au site Web. Les actions s'adressant à ce public cible devraient donc porter d'une part sur l'amélioration du site Web RAPEX et d'autre part sur une surveillance permanente de la satisfaction des utilisateurs.

Dans la mesure où les *non-utilisateurs non sensibilisés* se trouvent majoritairement dans des petites entreprises et micro-entreprises qui délèguent explicitement la responsabilité en matière de sécurité des produits à leurs partenaires commerciaux, il est recommandé de procéder en deux étapes. En premier lieu, il est nécessaire de prendre des mesures de sensibilisation axées sur l'importance de la sécurité des produits dans son ensemble, afin

de mettre en garde les non-utilisateurs non sensibilisés sur leurs obligations. En second lieu, des informations spécifiques sur le site Web RAPEX, son potentiel et mode d'utilisation peuvent être fournies. Pour une mise en œuvre réussie de cette approche, l'implication des associations professionnelles et autres acteurs constitue un point crucial.

Les *non-utilisateurs réticents* pourraient constituer le public cible le plus difficile à atteindre, ceux-ci négligeant le site Web RAPEX pour des raisons divergentes. Les acteurs ayant une perception erronée pourraient être plus réfractaires à un apprentissage concernant le site Web RAPEX. Il est néanmoins indispensable de fournir des informations spécifiques sur le site Web RAPEX, son potentiel et mode d'utilisation afin de convaincre ce groupe de sociétés de l'utilité des informations RAPEX. Pour étendre ce rayonnement, il convient de recourir à des modes de communication diversifiés et d'impliquer des acteurs différents. Des améliorations reflétant de manière distincte le retour d'information fourni par les utilisateurs viennent pour cela répondre aux besoins des non-utilisateurs réticents qui n'étaient pas satisfaits du fonctionnement du site Web RAPEX. Les sociétés doivent recevoir l'assurance que leurs suggestions et retour d'information sont pris en compte. Enfin, les actions devraient se concentrer sur une collaboration étroite avec les autorités nationales, au vu de la confiance que de nombreuses sociétés de ce public cible leur accordent. Les informations distribuées par des acteurs de confiance peuvent convaincre les entreprises que le site Web RAPEX constitue un outil utile pour identifier des produits dangereux.

RECOMMANDATIONS DESTINÉES À ENCOURAGER L'UTILISATION DES INFORMATIONS RAPEX

Deux recommandations au sens large destinées à la Commission européenne découlent de l'analyse des publics cibles ainsi que de leurs besoins et attentes. La mise en œuvre de ces recommandations dépend des ressources disponibles et peut être restreinte par le cadre légal.

ENSEMBLE DE RECOMMANDATIONS 1: AMÉLIORATION DU SITE WEB RAPEX

Le premier ensemble de recommandations concerne les améliorations du site Web RAPEX. L'optimisation du site Web RAPEX revêt une importance capitale dans l'amélioration de l'utilisation des informations RAPEX par des utilisateurs réguliers. Une convivialité accrue réduit en outre les barrières pour des non-utilisateurs non sensibilisés et/ou réticents en ce qu'elle permet à ceux-ci de comprendre immédiatement le but et la valeur du site Web RAPEX lorsqu'ils le consultent.

Les recherches ont révélé qu'un site Web RAPEX utile devrait être conçu de manière générale comme une *plateforme sur les informations de sécurité des produits destinée aux entreprises*. Quoique la publication de notifications RAPEX soit appréciée, le site Web RAPEX devrait en outre proposer un accompagnement en matière de sécurité des produits, tel que des guides pas à pas sur les obligations légales des opérateurs économiques. Il est donc recommandé d'envisager un élargissement de la portée du site Web et de l'optimiser dans une perspective ne se limitant pas à de simples changements des fonctionnalités actuelles. La présente étude n'a pas pour objectif de développer un nouveau concept de site Web mais les suggestions suivantes peuvent servir de point de départ à cette réorganisation:

- *Améliorations au niveau de la conception du site Web*, incluant la publication d'informations plus précises sur la page d'accueil ainsi que l'utilisation d'un langage axé sur le commerce et d'illustrations graphiques;

- *Possibilité de regrouper les notifications par secteur, par exemple par le biais d'une fonction de recherche optimisée;*
- *Des avertissements par courriel plus ciblés, par exemple en fournissant des options permettant de sélectionner des sujets d'intérêt et la fréquence des avertissements;*
- *Plus d'informations sur la raison ayant motivé la notification, sur les niveaux de risque et l'évaluation des risques, dont la définition claire des catégories de risque, des informations exhaustives sur la raison motivant la notification et la manière dont l'évaluation des risques a été réalisée;*
- *Des informations pour l'identification des fabricants responsables, et*
- *Des photos de meilleure résolution.*

En complément de ces suggestions, une réorganisation du site Web RAPEX pourrait comprendre des micro-enquêtes régulières et une boîte à idées en ligne permanente dans le but de surveiller la satisfaction des utilisateurs et de recevoir un retour d'information régulier de leur part.

ENSEMBLE DE RECOMMANDATIONS 2: MEILLEURE SENSIBILISATION ET IMPLICATION DES ACTEURS

Le second ensemble de recommandations destiné à encourager l'utilisation des informations RAPEX concerne des activités de sensibilisation et d'implication des acteurs. Les recherches ont révélé des lacunes en termes de connaissances et des perceptions erronées concernant la sécurité des produits et le site Web RAPEX, en particulier au sein des non-utilisateurs non sensibilisés et réticents. Afin de combler ces lacunes, diverses activités à but d'information peuvent s'avérer utiles, lesquelles s'appuient sur des moyens de communication intégrés dans l'environnement professionnel des entreprises. A ce titre, il est hautement recommandé d'établir une collaboration étroite avec les acteurs tels que les associations professionnelles. Lors d'une première phase, un dialogue avec les organisations d'acteurs pertinentes pourrait être institué afin de *débattre des mesures appropriées permettant de mieux sensibiliser les petites entreprises et micro-entreprises en matière de sécurité des produits*. Un tel dialogue servirait, d'une part, à encourager l'utilisation possible du site Web RAPEX en tant qu'outil commercial auprès des acteurs et, d'autre part, à établir des relations avec des organisations en mesure de poursuivre ces actions de sensibilisation auprès des sociétés. La Commission européenne pourrait soutenir ces acteurs en prenant en charge des activités de sensibilisation de diverses manières, dont un éventuel financement. Les activités suivantes ont été identifiées comme des outils potentiellement pertinents pour la sensibilisation:

- *Séminaires*: Des séminaires concernant la sécurité des produits et l'utilisation du site Web RAPEX fournissent une plateforme aux entreprises intéressées afin de se familiariser et de se former sur le sujet. Les associations professionnelles sont les acteurs les mieux placés pour proposer ces séminaires dans la mesure où elles peuvent s'appuyer sur leurs membres pour la participation. Les autorités nationales ainsi que la Commission européenne pourraient pour leur part contribuer par le biais, par exemple, de présentations et supports éducatifs.
- *Webinaires*: Afin de toucher les entreprises souhaitant s'engager activement mais limitées en termes de ressources, les webinaires constituent une bonne solution. Les opérateurs économiques peuvent décider de visionner les webinaires en fonction de leur propre calendrier et reçoivent les informations qui les intéressent.
- *Bulletins d'information*: Les bulletins d'information ont pour avantage de toucher un nombre de sociétés bien plus grand que les séminaires et webinaires, y

compris celles qui ne s'intéresseraient pas activement au sujet. Il pourrait également être envisagé de distribuer des contenus informatifs, articles et communiqués de presse prêts à l'emploi relatifs à la sécurité des produits auprès d'organisations envoyant elles-mêmes des bulletins d'information.

- *Information au sein des salons professionnels*: Le programme d'événements ou de séminaires accompagnant les salons professionnels peut notamment fournir une tribune pour toucher un grand nombre de sociétés qui ne sont pas impliquées activement dans la sécurité des produits. A cette fin, la Commission européenne pourrait collaborer avec les associations professionnelles et autres acteurs déjà présents sur ces salons, ou explorer des partenariats avec les organisateurs de salons.

Pour que cette sensibilisation s'avère efficace, il est nécessaire de faire intervenir ces outils de communication de manière combinée. Les activités décrites plus haut sont de nature complémentaire. La détermination des activités convenant le mieux à la promotion du site Web RAPEX passe par l'identification de partenaires appropriés pour leur mise en œuvre et dépend, par conséquent, des conclusions issues du dialogue avec les acteurs suggéré plus haut.

3. INTRODUCTION

The European Commission's Directorate General for Justice and Consumers (DG JUST) has commissioned Civic Consulting of the Consumer Policy Evaluation Consortium (CPEC) to conduct a study on the promotion of the use of RAPEX information by importers, distributors and retailers in the field of consumer product safety, with a particular focus on SMEs. This report presents the findings of this research.

The EU Rapid Alert System for dangerous non-food products (RAPEX) established in accordance with Article 12 of the Directive 2001/95/EC (The General Product Safety Directive – GPSD) is generally considered as one of the success stories of the EU. The 10-year anniversary of RAPEX gave impetus for the European Commission to assess its current status and to examine opportunities for broadening its use with a view to further increasing the health and safety of European consumers. One action identified was to promote the use of publicly available RAPEX information amongst economic operators as a business tool to ensure product safety.

It is against this background that the study on the promotion of the use of RAPEX information by importers, distributors and retailers in the field of consumer product safety, with a particular focus on SMEs, was commissioned to Civic Consulting of the CPEC. The objective of this study is to provide an overview of the way how a target group of economic operators (importers, distributors, retailers) purchases goods, with a particular focus on if and how they use product safety information to monitor whether the products they sell or import are safe. The main focus of the study is to understand whether importers, distributors and retailers of consumer products currently use the information available on the RAPEX website and how the use of such information can be improved.

To this end, the study examines first the extent to which targeted economic operators are aware of the product safety information available on the RAPEX website, and second the extent to which they use this information in their business practice as an instrument of product safety. Different target audiences of the RAPEX website are identified by clustering economic operators according to their level of knowledge and use of the website. Taking into consideration the needs and expectations of the different target audiences, recommendations and communication messages are developed with a view to increasing the uptake of RAPEX information throughout the EU so that notified unsafe products are not sold or purchased.

In fulfilment of the objective of the study, for the research, three methodological tools were employed. First, a structured mapping exercise was conducted to identify a balanced sample of targeted economic operators across countries and sectors. Second, a survey was implemented to collect evidence from a broad range of importers, distributors and retailers. Third, interviews were conducted with a view to complementing survey results by gathering a more detailed perspective of economic operators on the RAPEX website. Research took place between December 2014 and July 2015. Data was collected in five target sectors (toys, clothing/fashion, electrical appliances/housewares, cosmetics, and childcare articles), covering 14 EU Member States. Target countries represented all geographic regions of the EU and more than two thirds of the EU population.

Presenting the findings of this research, this report is structured as follows:

- *Section 4* describes the methodology employed to conduct the research;
- *Section 5* elaborates on the background of the study, including a characterisation of target sectors and economic operators;
- *Section 6* outlines the results of the survey and the interviews; and
- *Section 7* presents the conclusions of the analysis and the recommendations.

4. METHODOLOGY OF THE STUDY

This section presents the methodology of this study. It outlines the steps undertaken and the methodological tools employed to conduct the research.

Three main tasks were to be conducted in the framework of this study:

- Illustrate the representativeness of the potential targeted economic operators, by way of a 'map';
- Conduct a survey and a number of interviews with selected economic operators; and
- Elaborate recommendations on possible channels and tools to promote RAPEX and improve the use of the RAPEX information by the targeted categories of economic operators.

The following sub-sections describe the scope of these tasks and the research tools employed to conduct them. For the full description of the methodology, please see Annex I.

4.1. MAPPING ECONOMIC OPERATORS

The main purpose of mapping economic operators was the establishment of a sectorally and geographically balanced sample of companies and business associations, which in the subsequent research process were targeted as participants for the survey and taken into consideration as potential interviewees.

The following table outlines the criteria used for the compilation of the map.

Table 1: Criteria of the map of economic operators

Overall criteria	Specification of the criteria
Balanced representation of economic operators regarding size	A minimum of 200 economic operators including: - A minimum of 5 large multinational companies - A minimum of 70% [i.e. 140] of SMEs
Balanced representation of economic operators regarding type	A minimum of 5 sectoral business organizations at national and EU level Representative distribution of types of economic operators among importers, distributors and retailers reflecting the characteristics of the market
Sector relevance	Economic operators have to operate in at least one of the following five key RAPEX sectors of consumer products: toys, clothing, cosmetics, electrical appliances, and childcare articles
Geographical balance	Operators based in at least half of the EU Member States [i.e. 14] Representation of all geographical regions in the EU and coverage of at least 2/3 of the EU population

Source: Civic Consulting.

In order to comply with these criteria, the following steps were employed:

- Selection of target countries;
- Definition of sample size by country and sector;
- Identification of economic operators; and
- Compiling the map of economic operators.

In fulfilment of the overall criteria presented in the table above the following specific criteria were applied for the selection of target countries covered by this study:

- Coverage of at least half of the EU Member States;
- Coverage of at least two thirds of the European population;
- Coverage of the various geographical areas of Europe;
- Countries with different population and market sizes; and
- Differences in the number of notifications of RAPEX per capita.

On the basis of these specific criteria a list of 14 EU Member States was compiled, covering more than two thirds of the EU population and constituting a balanced mix of large, medium and small markets; countries from northern, westerns, eastern and southern Europe; and countries with high, medium or low number of RAPEX notifications per capita. The following Member States were chosen for the sample:

- Belgium
- Czech Republic
- Denmark
- France
- Germany
- Italy
- The Netherlands
- Poland
- Greece
- Romania
- Slovenia
- Spain
- Sweden
- United Kingdom

Following the selection of target countries, the sample size for the map was defined. Taking into consideration that economic operators in the map were targeted as participants in the survey and that response rates for online surveys of economic operators in general and for small and medium sized companies in particular tend to be low, the overall sample size of the map was set at to a minimum of 1000 economic operators. This sample was then split per country and sector.

Sample sizes per country were determined on basis of the market size of the country. Countries with big markets and large populations/number of operators were covered with a larger sample size, while countries with a small market and small populations/number of operators were covered with a smaller sample size.

Country samples were then split taking into consideration the market size of each sector as well as the share of RAPEX notifications. Comparably large sample sizes for operators in the clothing and the toy sector were based upon the exceptionally high percentages of RAPEX notifications for these two sectors. The smaller sample sizes for operators in the sectors of cosmetics, electrical appliances and childcare articles were based on the lower number of notifications and other considerations, such as market size.

Based on this approach, sample sizes per country and sector were defined. As the following table displays, 1010 economic operators were included in the map.

Table 2: Composition of country samples for map of operators

Country	Toys	Clothing/ fashion	Cosmetics	Electrical Appliances	Childcare Articles	Total
France	30	30	15	15	10	100
Germany	30	30	15	15	10	100
Italy	30	30	15	15	10	100
United Kingdom	30	30	15	15	10	100
Spain	30	30	15	15	10	100
Poland	21	21	10	10	8	70
The Netherlands	21	21	10	10	8	70
Belgium	21	21	10	10	8	70
Czech Republic	15	15	7	7	6	50
Denmark	15	15	7	7	6	50
Greece	15	15	7	7	6	50
Romania	15	15	7	7	6	50
Slovenia	15	15	7	7	6	50
Sweden	15	15	7	7	6	50
<i>Total</i>	<i>303</i>	<i>303</i>	<i>147</i>	<i>147</i>	<i>110</i>	<i>1010</i>

Source: Civic Consulting. Note: As importers, distributors and retailers may cover several sectors, the distribution is indicative.

For the identification of these 1010 economic operators to be included in the map, a two-step research approach was employed for all countries covered. First members of national business associations in the relevant sectors were identified. Second, structured internet research was conducted to complement the sample also with economic operators that are not necessarily members of business associations. Using both approaches the required number of economic operators split according to the samples per country and sector were identified.

Following their identification, the websites of all economic operators was visited in order to collect and complete the following information on the operator for the compilation of the map:

- Name and contact details;
- Target sector(s) the company operates in;
- Type of economic operator (importer, distributor, retailer);
- Size of operators (SME or a large multinational company).

Information was compiled in an excel data base, ensuring that all criteria listed in the previous steps were adhered to.

4.2. SURVEY AND INTERVIEWS

The objective of the survey and the interview was to collect evidence in particular from importers, distributors and retailers as well as from business associations in the target sectors on:

- Purchasing strategies of companies of consumer products for resale;
- Approaches to ensure product safety;
- Awareness and use of RAPEX;
- Suggestions for improving the RAPEX website; and
- Potential communication channels and messages to reach out to economic operators.

SURVEY

The following steps were undertaken for conducting the survey:

- Definition of survey approach;
- Survey design;
- Test of the questionnaire;
- Launch of the survey;
- Validation of survey data; and
- Synthesis and analysis of survey results.

A questionnaire with a total of 13 questions, including drop-down menus, multiple choice and free text questions, was developed and tested amongst a small group of companies (see Annex II). The questionnaire was translated into all official languages of the target countries and implemented in Qualtrics, a dedicated online platform. All companies and business associations identified during the mapping exercise received an invitation to participate in the survey by email. Follow-up emails to remind economic operators to participate in the survey were sent out three times. Furthermore, a number of follow-up phone calls were conducted focusing on countries and sectors, which had a low response rate. Data was collected between 22 April 2015 and 1 June 2015 and subsequently validated, analysed and synthesised. In total 94 valid responses were received. Survey results are presented in Section 6 of this report.

INTERVIEWS

For conducting the interviews, the following steps were undertaken:

- Designing the approach for interviews;
- Developing the interview instruments;
- Conducting interviews;
- Validation of data; and
- Synthesis and analysis of results.

Interviews were conducted with the intention to complement the data collected in the survey, by targeting in particular operators in countries with low survey response rates, namely Spain, Italy, the Netherlands, Czech Republic, Romania, Greece and Poland. Furthermore each one interview was conducted with a company from Belgium and from Denmark.

Two sets of guiding questions were established: one for companies and one for business associations (see Annex III). These guiding questions as well as detailed introduction to the topic were provided to interviewers in preparation of their task.

Sending out invitations by email turned out to be an inefficient way of convincing the targeted economic operators to participate in interviews (only 3 interviews could be scheduled). Therefore, interviewers with native language skills of the seven countries with a low response rate in the survey called potential interviewees and conducted interviews immediately.

A total of 49 interviews with companies and business associations were conducted during the main field work.¹ The data collected was validated, synthesised and analysed. Complementing the analysis from the survey, interview results are also included in Section 6 of this report.

4.3. DEVELOPING RECOMMENDATIONS

Based on an analysis of the data collected from the survey and the interviews, recommendations were developed with the view to increasing the uptake of the RAPEX website as a business tool for economic operators to ensure product safety.

In a first step, different target audiences and their expectations towards the RAPEX website were defined. In a second step, specific actions were elaborated tailored to the target audiences, including communication channels, relevant stakeholders and key messages. The feasibility and effectiveness of these strategies were discussed with companies in three follow-up interviews. Finally, based on the analysis above recommendations are presented.

¹ In addition, during the exploratory phase 10 interviews were conducted. Together with the 3 follow-up interviews to test feasibility of recommendations, this brings the total number of interviews to 62.

5. BACKGROUND OF THE STUDY

This section outlines the context of this study as the basis for further analysis and describes the main characteristics of economic operators and sectors considered in the research.

Protecting the health and safety of European consumers is a major priority for the EU. In order to ensure that only safe products are placed on the market, the General Product Safety Directive (2001/95/EC) (GPSD) establishes a general safety requirement for all non-food consumer products. According to the GPSD, a safe product is defined as one that “under normal or reasonably foreseeable conditions of use [...], does not present any risk or only the minimum risks compatible with the product's use [...] for the safety and health of persons” (2001/95/EC, Article 2). The GPSD complements sector specific product safety legislation such that products falling under sector specific legislation are also subject to the GPSD with regard to those aspects, risks or risk categories not covered sectorally.²

In order to facilitate a rapid exchange of information between Member States and the European Commission on products, which do not comply with EU safety regulations, Article 12 of the GPSD establishes the Rapid Alert System for non-food dangerous products (RAPEX).³ While RAPEX primarily is a tool of information exchange for competent authorities of Member States and the EU to facilitate market surveillance, it also serves through its website as a source of information for the wider public on products found unsafe.

On the RAPEX website, the European Commission publishes information on notified unsafe products on a weekly basis. The website describes in detail the products subject to RAPEX notifications as well as their non-compliance or hazard using the categories displayed in the following text box. The purpose of making this information publically available is to enable consumers as well as business operators and other interested stakeholders to identify unsafe products in the market.

² European Commission - DG Health and Consumers, Guidance Document on the Relationship Between the General Product Safety Directive (GPSD) and Certain Sector Directives with Provisions on Product Safety, November 2003, p.5; and Directive (2001/95/EC), Article 1.

³ Directive (2001/95/EC), Article 12.

Information provided on the RAPEX website

Products subject to RAPEX notifications are described using the following classification:

- *Product category;*
- *Brand and name of the product;*
- *Type or number of the model;*
- *Batch number or barcode;*
- *OECD portal category;*
- *Country of origin; and*
- *A detailed description of the product with a picture.*

Furthermore, information on the reason for the notification is provided, specifying:

- *The type and severity of the risk notified;*
- *The measures taken;*
- *The notifying country; and*
- *All countries taking actions in the follow-up.*

According to a user survey undertaken by the European Commission, information on the RAPEX website is regularly consulted by consumers, public authorities, retailers, importers and other interested stakeholders in order to obtain information on the safety of certain products. Whether, how and to what extent in particular importers, distributors and retailers use the information available on the RAPEX website for ensuring product safety and how the uptake of such information can be increased is the objective of this study. The following sub-sections provide an overview of the context relating to this objective.

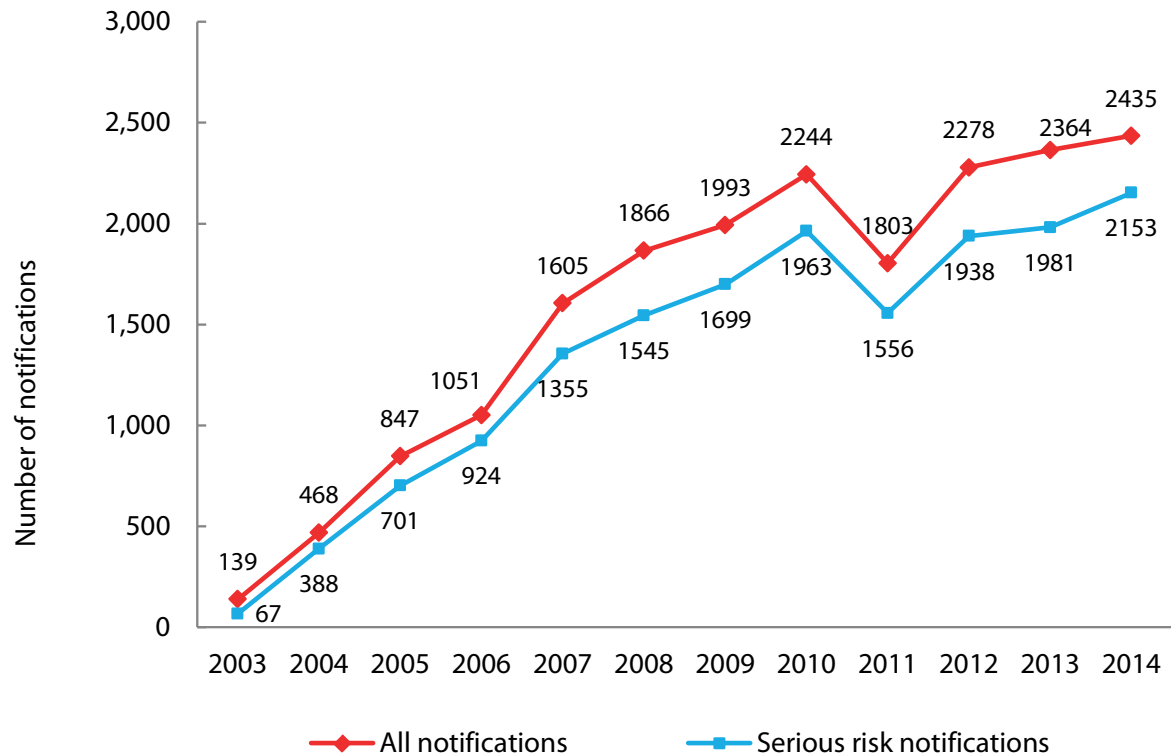
- Sub-section 5.1 discusses the trends of RAPEX notifications;
- Subsection 5.2 describes the economic operators targeted in this study; and
- Sub-section 5.3 characterises the target sectors.

5.1. TRENDS OF RAPEX NOTIFICATIONS

During its 11 years of existence, the number of notifications through RAPEX has steadily increased, with the exception of 2011. While in 2004, 468 notifications had been received, in 2014 the system registered 2435 notifications. The following figure depicts the trend of RAPEX notifications between 2003 and 2014.⁴

⁴ European Commission- DG Justice and Consumers, Keeping European Consumers safe - Rapid Alert System for dangerous non-food products: 2014 - Complete Statistics, 2014, p.9.

Figure 1: Ten-year trend of RAPEX notifications (total and serious).

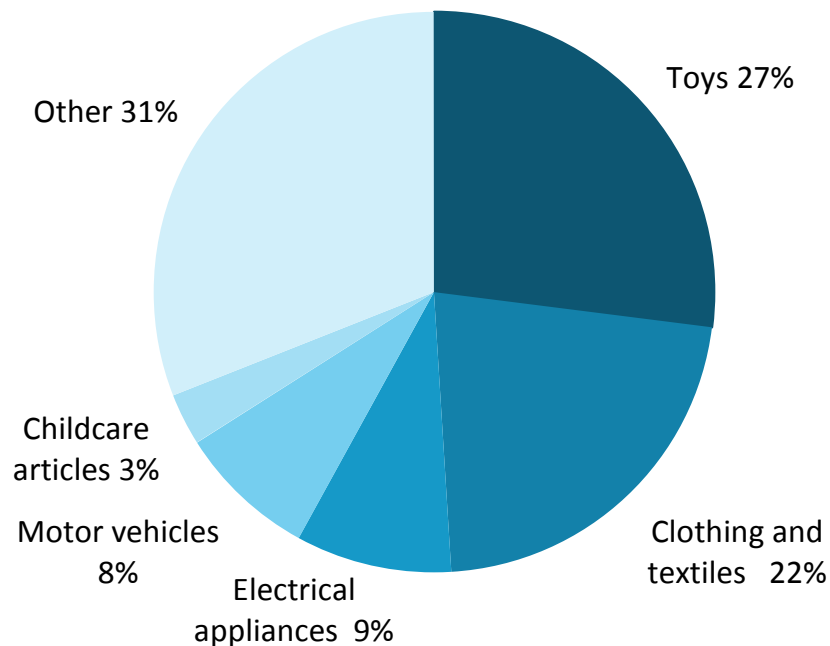


Source: Civic Consulting on the basis of “Keeping European Consumers safe - Rapid Alert System for dangerous non-food products: 2014 - Complete Statistics”.

In terms of notifications per sector, the five most notified product categories in 2014 were: toys (650 or 27%) clothing and textiles (530 or 22%), electrical appliances (217 or 9%), motor vehicles (194 or 8%), and childcare articles (81 or 3%).⁵ Other relevant sectors included cosmetics (74) and jewellery (63). The figure below illustrates the top five product categories for which RAPEX notifications were made in 2014.

⁵ European Commission- DG Justice and Consumers, Keeping European Consumers safe - Rapid Alert System for dangerous non-food products: 2014 - Complete Statistics, 2014, p.15.

Figure 2: Top five product categories for RAPEX notifications, 2014.



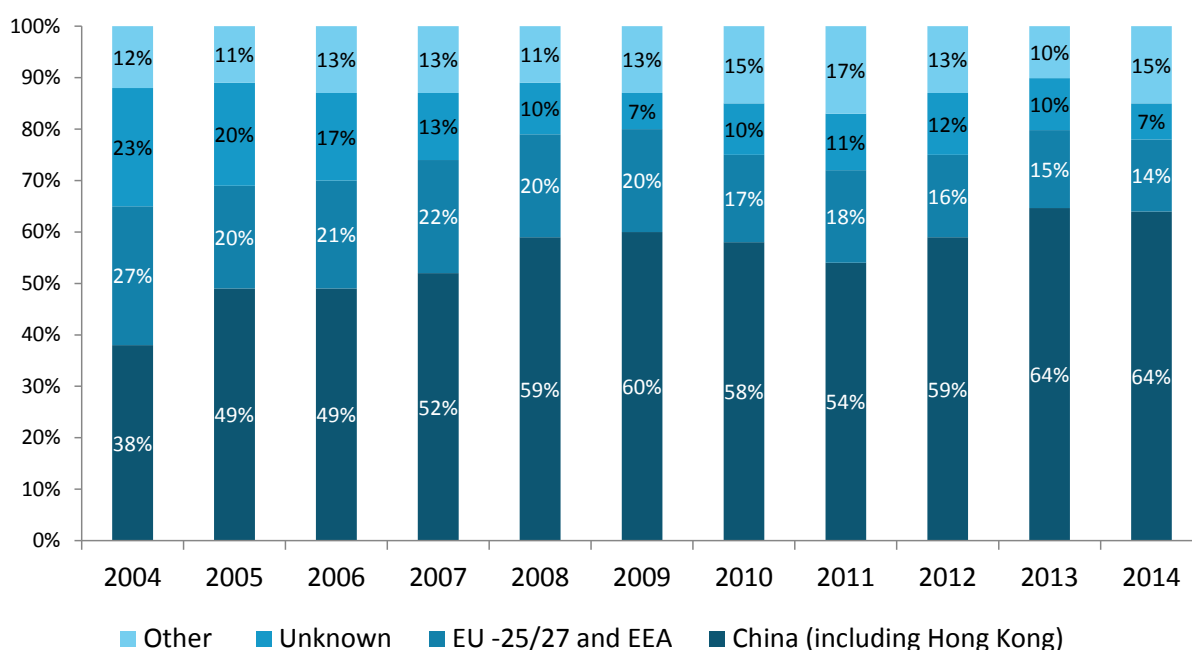
Source: Keeping European Consumers safe - Rapid Alert System for dangerous non-food products: 2014 - Complete Statistics.

The share of notifications for products originating from an EU/EEA country⁶ has decreased from 27% in 2003 to 14% in 2014, indicating that the majority of products posing a risk to the health and safety of consumers are imported.⁷ Products imported from China represent a particularly large share of RAPEX notifications, followed by Turkey. Despite all efforts undertaken by the European Commission, including an agreement with Chinese authorities on a toy safety action plan and agreements with US and Chinese authorities on international co-operation on product safety, the share of notifications of products imported from China has again risen from 54% in 2011 to 64% in 2014. The figure below depicts the ten year trend of RAPEX notifications according to the country of origin of the notified product.⁸

⁶ EU/EEA countries include all Member States of the EU plus Iceland, Liechtenstein and Norway.

⁷ European Commission- DG Justice and Consumers, Keeping European Consumers safe - Rapid Alert System for dangerous non-food products: 2014 - Complete Statistics, 2014, p.19.

⁸ European Commission- DG Justice and Consumers, Keeping European Consumers safe - Rapid Alert System for dangerous non-food products: 2014 - Complete Statistics, 2014, p.19.

Figure 3: Top five product categories for RAPEX notifications, 2014.

Source: Keeping European Consumers safe - Rapid Alert System for dangerous non-food products: 2014 - Complete Statistics

To conclude, these trends of RAPEX notifications describe the background for selecting the five sectors (i.e. clothing/fashion, toys, cosmetics, electrical appliances, and childcare articles) and economic operators (i.e. importers, distributors, and retailers) for the purpose of this study.

5.2. ECONOMIC OPERATORS

Three types of economic operators are targeted in this study: importers, distributors, and retailers. For the purposes of the research, they are characterized as follows:

- An *importer* is understood as any natural or legal person established within the EU who imports consumer products from manufacturers or distributors not established in the EU.
- A *distributor* is any person or legal entity that makes large quantities of consumer products available to other businesses for resale. Products can be both distributed on behalf of a manufacturer or purchased as a wholesale from another distributor. Therefore, distribution and wholesale have been grouped into one category for this study, namely distribution/wholesale.
- A *retailer* refers to any person or legal entity that purchases consumer products in large quantities and sells it directly to the consumers, i.e. the retailer is the final point of sale.

An economic operator carries product safety responsibilities for all products included in its product range. The scope of these responsibilities depends on the business approach of an economic operator (e.g. import or wholesale) and the specific legislation the product falls under. For example, cosmetic products and toys each fall under sector

specific legislation defining distinct product safety responsibilities for different types of economic operators.⁹ For products not falling under a sector specific legislation, such as clothing and fashion items, the General Product Safety Directive (GPSD) sets out product safety duties for economic operators.¹⁰

For example, the GPSD obliges producers to only place safe products on the EU market¹¹ and to inform consumers about the “risks inherent in a product”¹². Distributors are required “to act with due care to help to ensure compliance with the applicable safety requirements” and “to participate in monitoring the safety of products placed on the market”.¹³ Both producers and distributors are obliged to notify and cooperate with competent authorities in case they have knowledge of an unsafe product on the market.¹⁴

Overall, it is the obligation of any economic operator to be informed about and comply with relevant product safety legislation. Depending on the product range and the role of the economic operator, different responsibilities may apply.

5.3. CHARACTERISTICS OF TARGET SECTORS

The five sectors selected for the purpose of this study, namely toys, clothing, electrical appliances, cosmetics and childcare articles are significant product groups for RAPEX in terms of their number of notifications per year. In the following paragraphs the scope of products considered in each sector is characterised.

TOYS

In 2014, toys were the product category most frequently notified in RAPEX, with 650 notifications. The toys sector saw the biggest rise in notifications between 2012 and 2014, increasing from 19% of all notifications in 2012 to 27% in 2014.¹⁵ For the purpose of this study, toys are defined as traditional toys and games, excluding products that are not regulated by the Toy Safety Directive. Hence, toys refer to items such as dolls, infant and pre-school toys, construction toys, outdoor and sports toys, board games and puzzles, but do not include video games, for instance.

In the toy sector, a sector specific Directive on product safety applies. In addition to the Toys Safety Directive, the European Commission addressed toy safety repeatedly in previous years, particularly since 2007 in reaction to the large number of product recalls in Europe. In 2008, a voluntary agreement was signed with the European toy industry, making a commitment to ensuring better safety in the toy supply chain. In 2009, the new Toy Safety Directive (Directive 2009/48/EC) was published, amending the previous directive, and improving existing rules. The Directive entered into force in July 2011, although the application of its part relating to chemical content had been delayed until July 2013.¹⁶

⁹ Directive (2009/48/EC) and Regulation (EC) No 1223/2009.

¹⁰ Directive (2001/95/EC).

¹¹ Directive (2001/95/EC), Article 3.

¹² Directive (2001/95/EC), Article 5.

¹³ Directive (2001/95/EC), Article 5.

¹⁴ Directive (2001/95/EC), Article 5.

¹⁵ European Commission- DG JUST, Keeping European Consumers safe - Rapid Alert System for dangerous non-food products: 2014 - Complete Statistics, 2014, p.13ff.

¹⁶ Directive (2009/48/EC).

CLOTHING/FASHION

In 2014, the second highest number of RAPEX notifications concerned clothing and fashion items, with 530 notifications recorded and accounting for 22% of all notifications.¹⁷ The clothing sector is a highly fragmented sector, with production including many steps from the individual fibre to the final clothing item. For the purposes of this study only final products having the purpose of covering or accessorising the body are considered. Items such as fabrics or household textiles are excluded.

In terms of product safety, clothing and fashion products mainly fall under the GPSD. Additional requirements are specified in Regulation (EC) No 1007/2011 *on textile fibre names and related labelling and marking of the fibre composition of textile products*. Furthermore, harmonized standards such as EN 14682:2007 *on Safety of children's clothing - Cords and drawstrings on children's clothing - Specifications apply*.¹⁸

ELECTRICAL APPLIANCES

Electrical appliances and equipment are the third most frequent cause for notifications in RAPEX, with a total of 217 notifications (9%) in 2014.¹⁹ Electrical goods should be conceptually distinguished from electronic goods, as these categories differ from each other in terms of product life cycles and replacement rates. This study focuses on the former category, which includes domestic appliances such as refrigerators, washing machines, microwave ovens, vacuum cleaners, coffee makers and irons.

In terms of legal requirements for product safety, the Directive 2006/95/EC on the harmonisation of the laws of Member States relating to electrical equipment designed for use within certain voltage limits is the main sector specific piece of legislation. This directive will be updated and replaced by Directive 2014/35/EU, which will be applicable as of 20 April 2016. In addition, a variety of other sector specific legislation applies, for example relating to energy labelling of household appliances.²⁰

COSMETICS

In 2014, cosmetics accounted for 3% of RAPEX notifications, a share remaining stable since the previous year.²¹ For the purposes of this study all products falling under Regulation (EC) No 1223/2009 are considered. Hence, a cosmetic product is defined as "any substance or mixture intended to be placed in contact with the external parts of the human body (epidermis, hair system, nails, lips and external genital organs) or with the teeth and the mucous membranes of the oral cavity with a view exclusively or mainly to cleaning them, perfuming them, changing their appearance, protecting them, keeping them in good condition or correcting body odours."²²

¹⁷ European Commission- DG Justice and Consumers, Keeping European Consumers safe - Rapid Alert System for dangerous non-food products: 2014 - Complete Statistics, 2014, p.13ff.

¹⁸ Commission Decision (2011/196/EU).

¹⁹ European Commission- DG Justice and Consumers, Keeping European Consumers safe - Rapid Alert System for dangerous non-food products: 2014 - Complete Statistics, 2014, p.13ff.

²⁰ Directive 2006/95/EC, Directive (2014/35/EU), and European Commission - Directorate General Enterprises and Industry, Additional European Union legislation affecting electrical products, 2015.

²¹ European Commission- DG Justice and Consumers, Keeping European Consumers safe - Rapid Alert System for dangerous non-food products: 2014 - Complete Statistics, 2014, p.13ff.

²² Regulation ((EC) No 1223/2009), Article 2.

The main legislation on product safety relevant for the cosmetics sector is Regulation (EC) No 1223/2009 on cosmetic products. The regulation specifies all obligations of economic operators and establishes a centralised notification system for all cosmetic products in the EU, the Cosmetic Products Notification Portal (CPNP). Cosmetic products need to be notified in the CPNP before being placed on the EU market by providing detailed information on the product, such as the composition of substances. The information is accessible only to competent authorities, including national poison centres. Despite the sectoral legislation and the ex-ante notification system, cosmetic products need to be notified in RAPEX if ex-post a non-compliance and a risk occur.²³

CHILDCARE ARTICLES

The number of RAPEX notifications related to childcare articles and children's equipment almost doubled from 43 to 81 between 2012 and 2014, accounting for 3% of total notifications in 2014.²⁴ According to the European Nursery Products Confederation, childcare articles can be defined as "products designed or intended to safely facilitate seating, bathing, changing and general body care, feeding, sleeping; transportation, and protection for children"²⁵.

In terms of product safety, the GPSD is the main legislation for childcare articles. A sector specific legislation does not exist. However, there are several European standards defining product safety for specific childcare articles and providing guidance for economic operators in the sector. Examples of recent guidelines for economic operators are CEN/TR 13387-1:2015 - CEN/TR 13387- 5:2015 on *Child use and care articles - General safety guidelines part 1 to 5*.

²³ Regulation ((EC) No 1223/2009).

²⁴ European Commission- DG JUST, Keeping European Consumers safe - Rapid Alert System for dangerous non-food products: 2014 - Complete Statistics, 2014, p.13ff.

²⁵ European Nursery Products confederation, Product safety standards, n.a.

6. RESULTS OF THE RESEARCH

On the basis of the data collected through the survey and interviews, this section examines the purchasing strategies and approaches of companies to ensure product safety. Furthermore, it describes the awareness of RAPEX amongst study participants and their suggestions for promoting the use of RAPEX information.

A total of 94 of the invited survey participants responded to the online questionnaire. In addition 49 interviewees provided insights in phone interviews. This section presents the compiled results of the survey and the interviews.

Sub-section 6.1 provides an overview of the characteristics of the survey participants. Subsection 6.2 describes the interviewees. Sub-section 6.3 assesses strategies of companies to identify and purchase products, followed by sub-section 6.4, which examines approaches of companies to ensure product safety. The last two sub-sections elaborate on the use of RAPEX in business practices by economic operators. Sub-section 6.5 analyses the awareness of RAPEX amongst survey respondents and sub-section 6.6 describes suggestions for promoting RAPEX.

Overall, this analysis serves as a basis for developing the recommendations presented in Section 7 of this study.

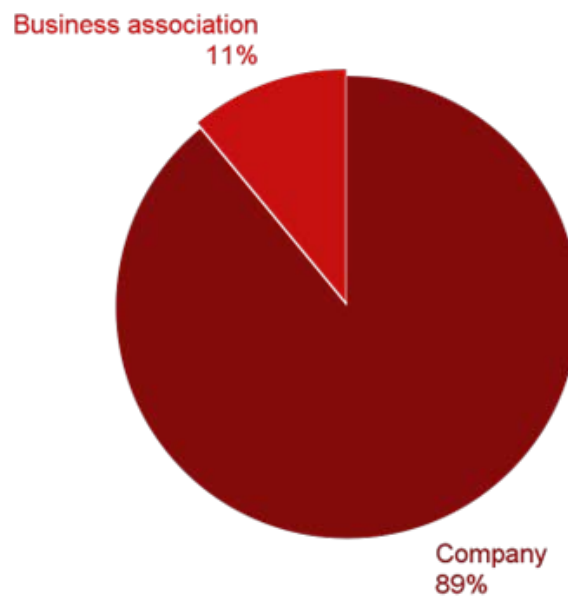
6.1. OVERVIEW OF SURVEY PARTICIPANTS

Key findings are:

1. Of the 94 respondents to the survey, 89% are companies and 11% represent business associations.
2. The majority (60%) of respondents belong to the toy sector. 53% of respondents operate in multiple sectors.
3. 80% of the companies participating in the survey are SMEs (i.e. 30% micro and 33% small companies as well as 17% medium-sized enterprises).
4. The two most frequent business models amongst survey respondents are distribution/wholesale (45%) and import (38%). Companies involved in these two business models are likely to use multiple business models at the same time (e.g. retail and import).

Two groups of respondents were targeted in the survey, companies and business associations. Of the 94 respondents to the survey, 89% or 84 are companies and 11% or 10 are business associations (see the following figure).

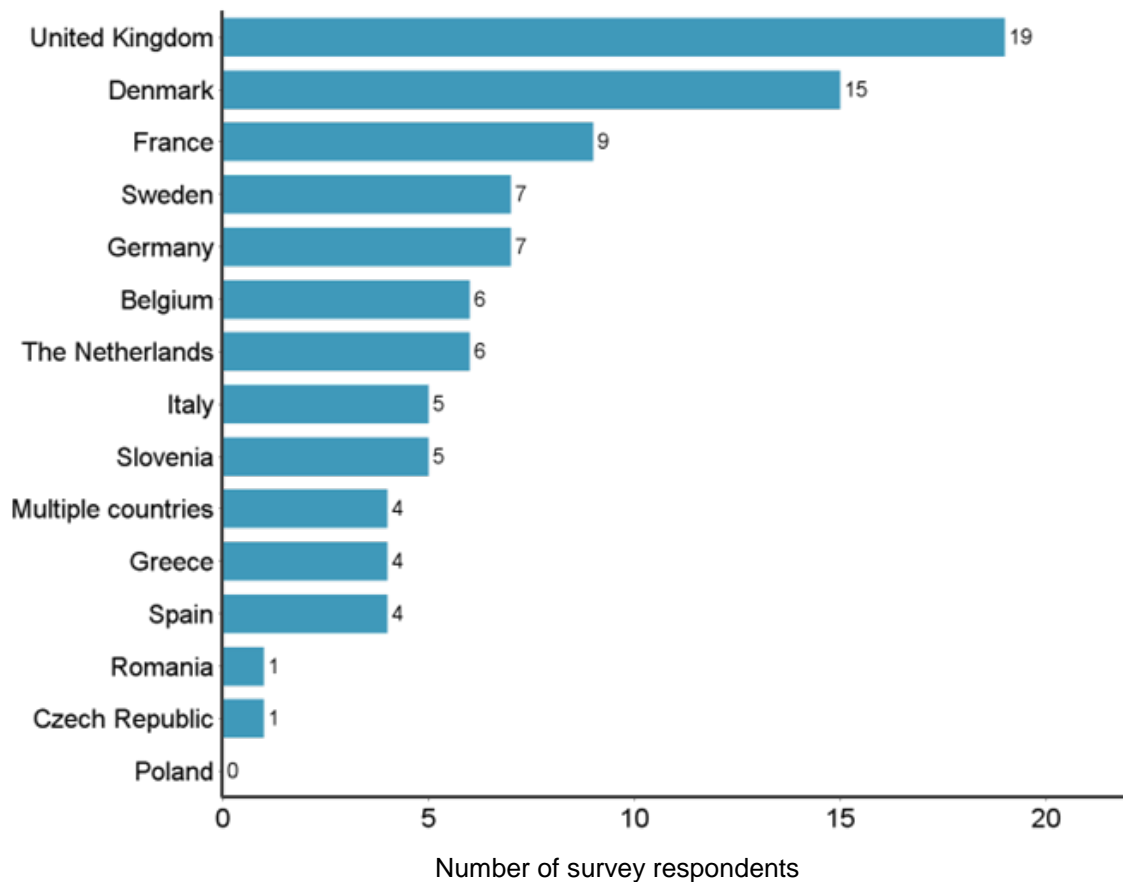
Figure 4: Survey respondents by type of organisation.



Source: Civic Consulting survey of economic operators on RAPEX, N=94.

As described in Section 4, 14 countries have been selected as target countries for this study. The following figure shows the distribution of survey responses among these 14 countries.

Figure 5: Survey respondents by country.

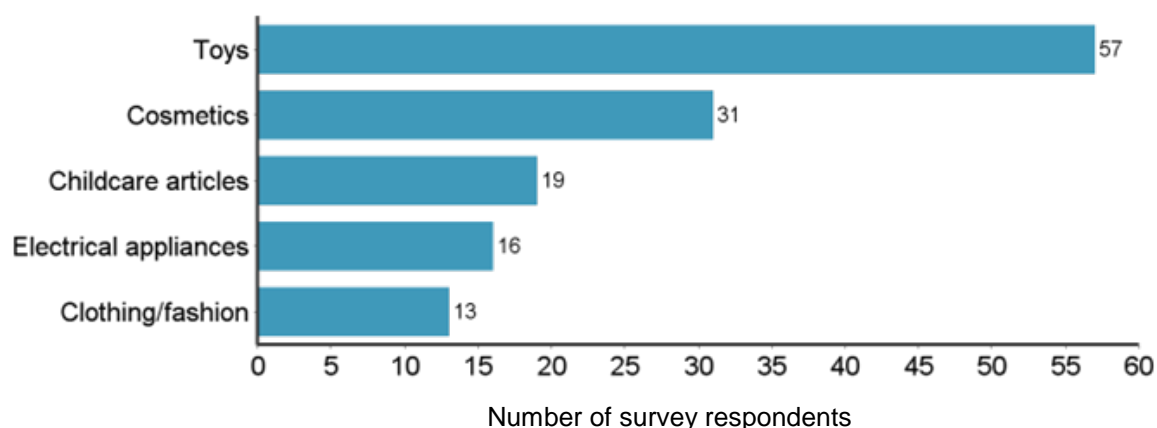


Source: Civic Consulting survey of economic operators on RAPEX, N=93. Note: N indicates the number of respondents providing an answer to a particular question. Since responses were not forced, N can differ from the total number of 94 survey respondents.

The largest share of survey respondents were registered in the United Kingdom (19), followed by Denmark (15), and France (9). Seven respondents came each from Sweden and Germany. Countries with the lowest response rates were Romania (1), Czech Republic (1) and Poland (0). Among the five countries with the biggest markets for consumer goods in the above-mentioned sectors, namely United Kingdom, France, Germany, Spain and Italy, Spain had the lowest response rate with only 4 responses followed by Italy with 5 responses. Four companies indicated that they are registered in multiple countries and specified amongst others the following countries: Luxembourg, France, the United Kingdom, the Netherlands, Germany, Slovakia and Sweden. Overall, geographic imbalances in the sample have to be duly noted.

The following figure displays the distribution of participants according to sectors.

Figure 6: Survey respondents by sector.



Source: Civic Consulting survey of economic operators on RAPEX, N=93. Note: Multiple answers possible.

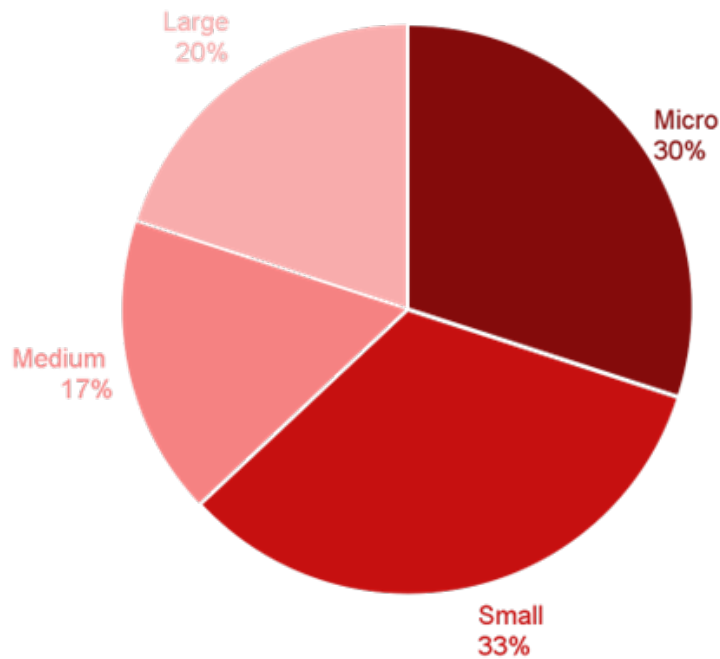
In total, 57 of 93 survey respondents indicated that they operate in the toy sector, 31 are active in the cosmetics sector, followed by the childcare article sector (19) and the electrical appliance sector (16). Clothing/fashion had the lowest representation with only 13 responses.

Survey respondents were able to select several sectors. Overall, in each sector, more than 50% of the respondents reported to operate in at least one additional sector.²⁶ For example, 30 out of the 57 respondents of the toy sector also operate in at least one additional sector e.g. childcare articles (selected by 11 respondents in addition to the toy sector). One company involved in the cosmetics and the electrical appliance sector, stated to also deal with products such as sunglasses, reading glasses, mobile phone accessories, and christmas gifts, which all fall under different sectors. Hence, complexity in terms of product safety increases for these types of companies due to their large variety of products.

As described in the introduction, the study puts a particular focus on SMEs. The following graph illustrates the distribution of companies responding to the survey by size (not including business associations).

²⁶ When respondents were asked to specify in which sector they operate, 27 out of 57 respondents selecting toys indicated to only operate in the toy sector, 8 out of 31 respondents selecting cosmetics indicated to only operate in the cosmetics sector; 4 out of 19 respondents selecting childcare articles indicated to only operate in the childcare article sector; 2 out of 16 respondents selecting electrical appliances indicated to only operate in the electrical appliances sector; 3 out of 13 respondents selecting clothing/fashion indicated to only operate in the clothing/fashion sector.

Figure 7: Companies responding to the survey by size.

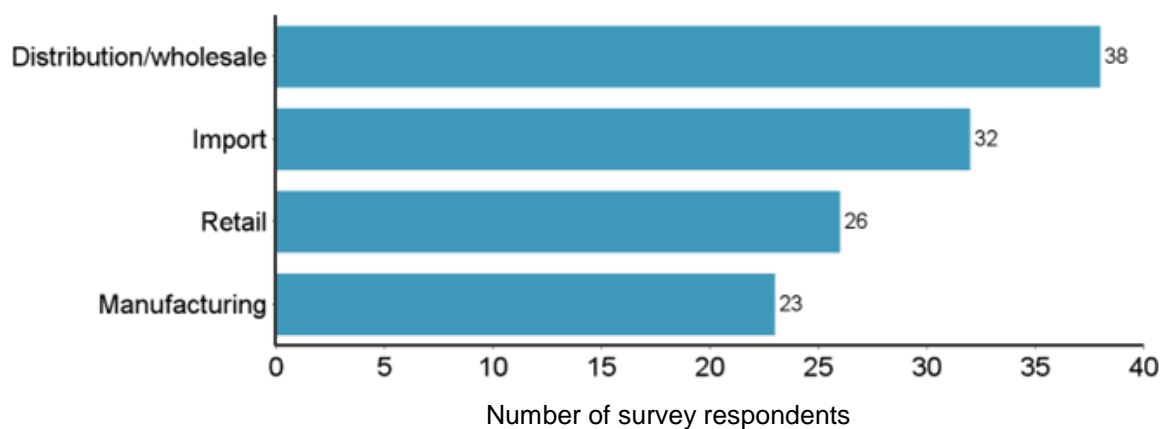


Source: Civic Consulting survey of economic operators on RAPEX, N=83.

The biggest share of the companies (33%) in the sample is of small size, followed by companies of micro size (30%) and companies of medium size (17%). Only 20% defined themselves as large/multinational companies, which in turn means that 80% of the companies are SMEs.

Companies participating in the survey had been asked to specify their main business model, i.e. retailer, distributor/wholesaler, importer, manufacturer. The following graph depicts the results.

Figure 8: Main business models of all companies.

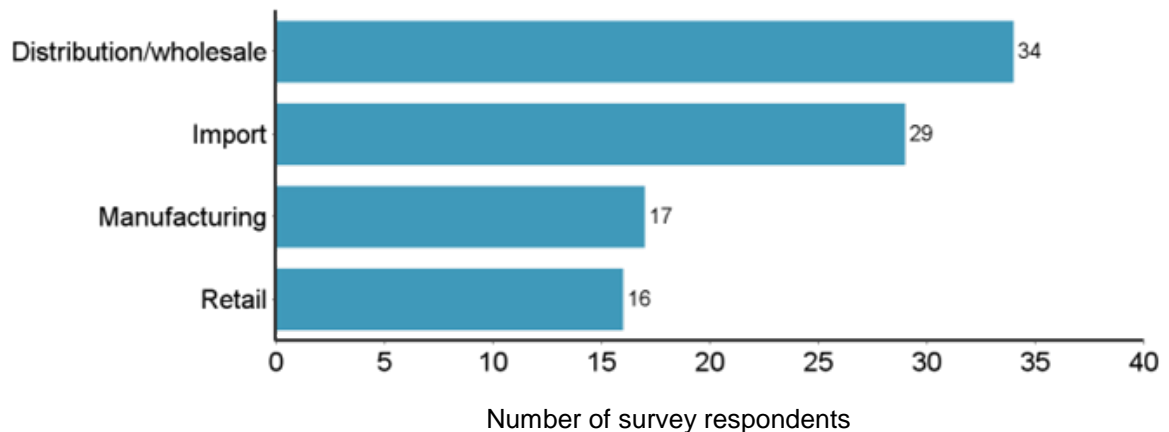


Source: Civic Consulting survey of economic operators on RAPEX, N=83. Note: Multiple answers possible.

As the figure above illustrates, the two categories most frequently selected are distribution/wholesale (38) and import (32). Furthermore, 26 companies are retailers and 23 companies are manufacturers.

The following graph illustrates the answers to the same question, taking into consideration only the responses of SMEs.

Figure 9: Main business models of SMEs.

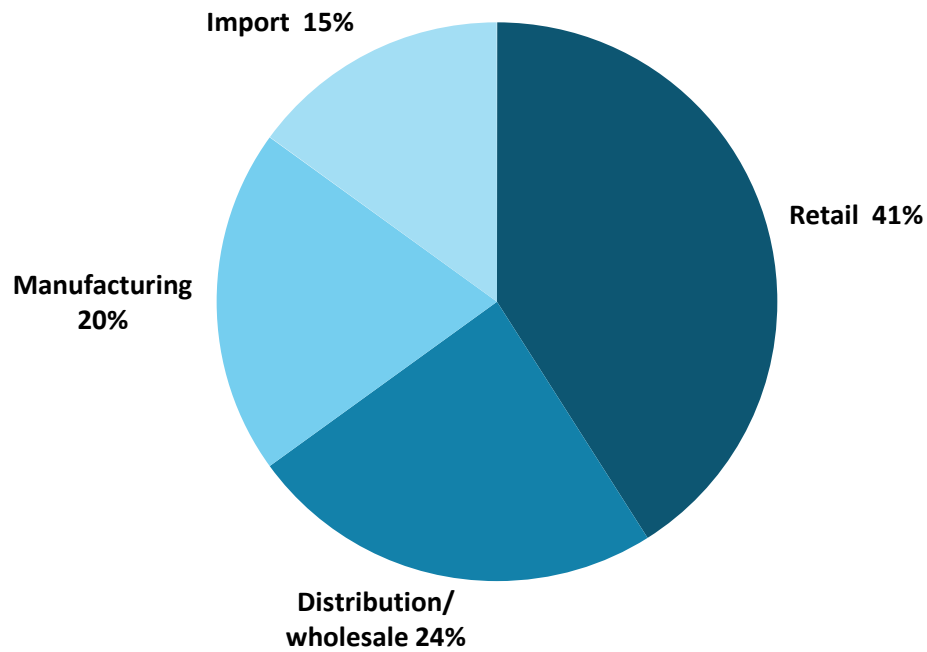


Source: Civic Consulting survey of economic operators on RAPEX, N=66. Note: Multiple answers possible.

Compared to the overall sample, manufacturing and retail seem considerably less important for SMEs than distribution/wholesale and import.

Out of the 84 companies participating in the survey almost half (41) follow only one main business model. The following figure illustrates the distribution of companies applying a single business strategy.

Figure 10: Companies with a single business model.

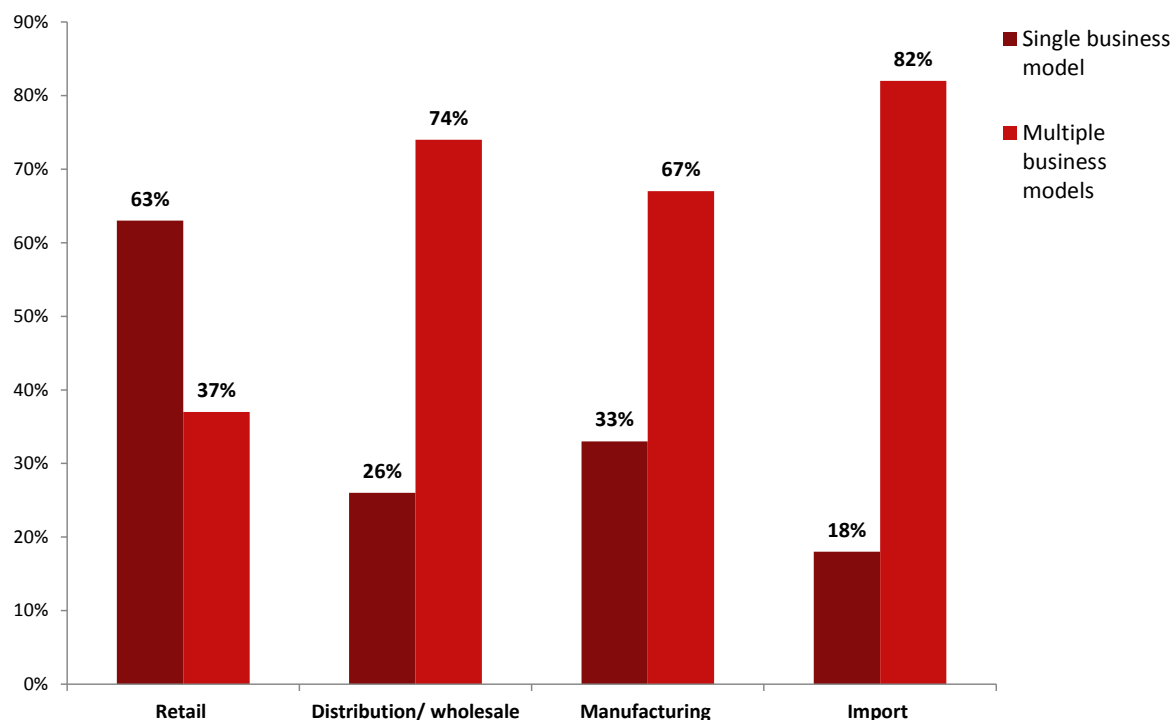


Source: Civic Consulting survey of economic operators on RAPEX, N=41.

From all companies in the sample employing a single business model, retailers provide for the largest share (41%), followed by distributors/wholesalers (24%), manufacturers (20%) and importers (15%).

The following figure compares companies involved in a single business model to companies using multiple business models.

Figure 11: Use of single or multiple business models.



Source: Civic Consulting survey of economic operators on RAPEX, N=83.

As the figure above illustrates, overall, companies are likely to use multiple business models. More than two thirds of the manufacturers, distributors/wholesalers and importers use at least one additional business model. Only for retailers it seems to be more likely to employ a single business model.

6.2. OVERVIEW OF INTERVIEWEES

The key findings are:

1. Compared to all other sectors, interviewed companies in the toy sector seem more likely to recognize product safety as an important issue to deal with.
2. Interviewed companies often operate in multiple sectors (e.g. toys and childcare) and use multiple business models (e.g. wholesale and retail) at the same time.
3. The choice of business models (i.e. retail, import, distribution) likely depends on the type and the availability of a product.

Out of the 49 interviews conducted, 33 interviewees represented micro-sized or small companies, 8 medium-sized companies, 2 large companies and 6 business associations.

Interviews focussed on those countries with a low response rate in the survey. Hence, Poland, Romania, Czech Republic, Greece, Spain, Italy and the Netherlands were particularly targeted and complemented by interviews with one Belgian and one Danish

company. Therewith, a geographic balance of the overall data sample was improved (i.e. data collected through the survey and the interviews).

Interviewees operate in all five target sectors of this study. The aim of the interviews was to focus on those sectors least represented in the survey, which has been achieved for the clothing/fashion sector. Furthermore, a larger proportion of the interviewees belong to the toy sector. Considering the spontaneous reactions to the interview request by phone, businesses in the toy sector seem to pay particular attention to product safety. This might also be the reason why companies operating in the toy sector have been more willing to engage in an interview on the topic.

In general, the interviews confirmed the conclusion from the survey that companies often involve in multiple sectors. A company's philosophy is not necessarily congruent with the scope of one sector. For example, one interviewee explained that her company specialises only in health care products, including items such as wet wipes and special sports clothes. Hence, the company is involved in both the cosmetics and the clothing/fashion sector. Another interviewee stated to focus on fair organic baby products, ranging from cosmetic products, such as baby lotions, to toys and baby clothes. Hence, while being very specialised, the company operates in at least three different sectors. Furthermore, businesses, such as gift shops, need to offer a wide range of products from different sectors. Therefore, as for the survey, analysing responses by sector provides only limited additional insights.

When elaborating on their business model, interviewees mainly indicated to follow multiple business models. Some retailers mentioned to also import products whereas some distributors/wholesalers specified to be also involved in retail etc.. In many cases, the chosen business model seems to depend on the type and the availability of the product. For instance, if a retailer is not able to directly import a product from a manufacturer due to the small quantities, he or she would consider purchasing the product from another retailer. Following the definition provided in Section 5.2, this other retailer is then also a distributor/wholesaler.

In conclusion, the choice of business models is linked to the company's philosophy and product range.

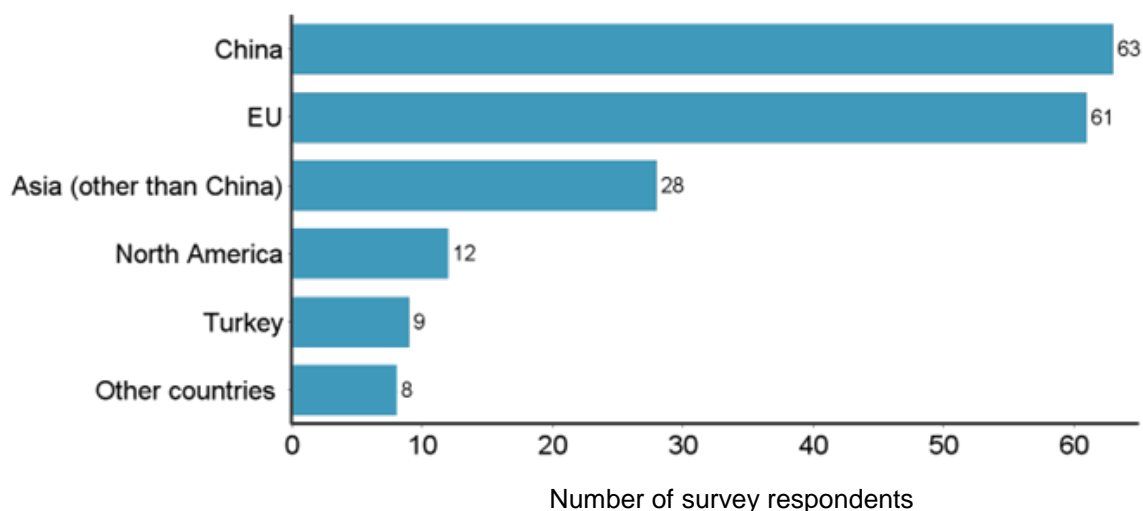
6.3. PURCHASING STRATEGIES OF COMPANIES

Key findings are:

1. 77% of the companies participating in the survey sell products that are manufactured in China, 74% of the companies market products produced in the EU. However, not all companies have a full overview of their supply chain.
2. 89% of the companies participating in the survey use English for purchasing products.
3. Companies prefer to rely on direct business relationships and are hesitant of internet-based strategies when identifying and purchasing products.

One objective of this study is to gain a better understanding of companies as a target audience for RAPEX. Given that the majority of products notified in RAPEX originate from abroad, survey respondents identifying themselves as companies had been asked to specify the countries/regions where their products had been manufactured (see the following figure).

Figure 12: Country/region of origin of products.



Source: Civic Consulting survey of economic operators on RAPEX, N=82. Note: Multiple answers possible.

The country most frequently selected was China (63) closely followed by the EU (61). Overall, more than 70% of the companies stated to sell products manufactured in China or the EU while Asian countries other than China came third, followed by far by North America (12) and Turkey (9). Other countries of origin include Switzerland, Norway, Ukraine, Mexico, Australia and Sri Lanka.

Assessing the responses by sector provides the following results: The results for the clothing/fashion sector and for the childcare article sector corresponds to the figure above. For the toy sector, China also comes first, followed by the EU. However, compared to the overall ranking, the EU is less important. In the cosmetics and the electrical appliances sector the EU ranked first and China ranked second. In the cosmetics sector, the EU led the ranking by wide distance.

Interviewees listed the same countries of origin for their products as those listed in the survey, with both China and the EU mentioned most often. Some interviewees pointed out that their products may have originated from China, but had been purchased from business partners located in the EU. Other businesses were not able to provide information about the country of production. They only knew the location of their supplier.

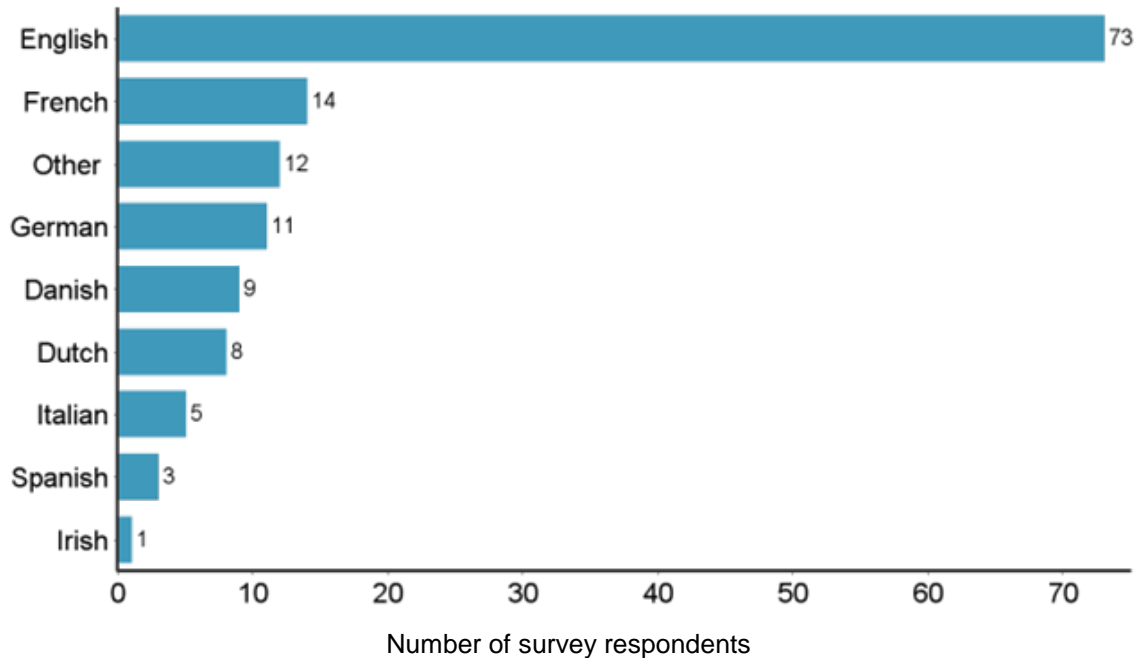
Overall, responses illustrated that not all companies have a full overview of their supply chain, which may lead to limited traceability of products and product safety issues subsequently. Given these inherent problems, one company had stopped buying products from non-European manufacturers all together due to liability issues.

Interviewees indicated that to a certain extent, the lack of knowledge regarding the supply chain stems from limited knowledge of foreign languages. While most of the companies use English, micro or small businesses often just have native language capacities and therefore rely only on business partners located in their own country.

The following figure gives an overview on the languages typically used by survey respondents for purchasing products. It is interesting to note that an overwhelming

majority, namely 89% or 73 out of 82 companies responding to this question mentioned English.

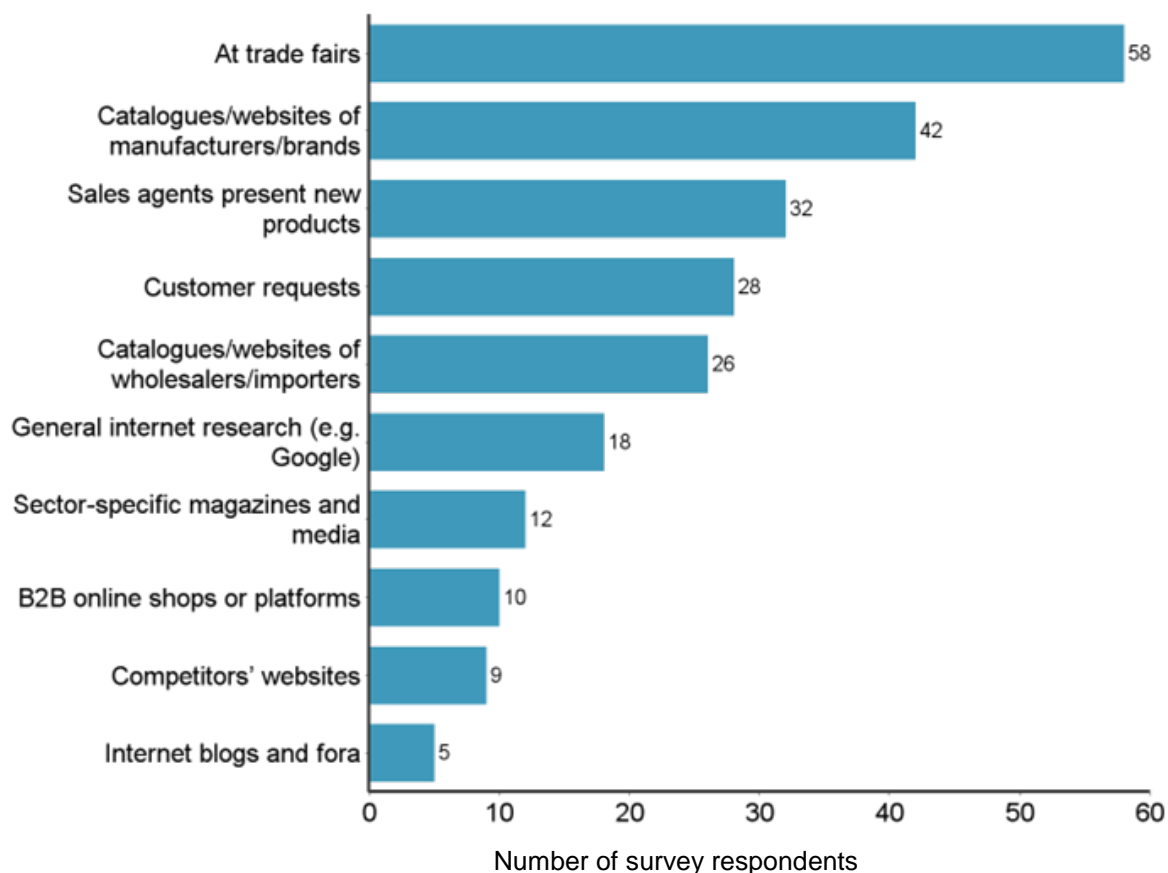
Figure 13: Main languages used to purchase products.



Source: Civic Consulting survey of economic operators on RAPEX, N=82. Note: Multiple answers possible.

PRODUCT IDENTIFICATION

With a view of gathering further insight into relevant business practices, companies participating in the survey had been asked how they identified new products. Respondents could select multiple answers out of 10 alternatives. The following figure ranks the approach from most frequently to least frequently selected.

Figure 14: Strategies to identify products for resale.

Source: Civic Consulting survey of economic operators on RAPEX, N=82. Note: Multiple answers possible.

The dominant strategy for identifying new products are trade fairs (58), followed by the search in catalogues and at websites of manufacturers and brands (42) as well as sales agents presenting new products to the company (32). Less than one third of the companies identify new products through customer requests or catalogues and websites of importers and wholesalers (28 and 26, respectively). Some companies furthermore reported to use other strategies such as the design and development of products in-house or the purchase of products from the parent group.

Overall, the survey responses highlight the preference of companies for relying on direct business relationships, either already existing, e.g. with manufactures, or to be established, e.g. at trade fairs. Strategies relating to internet-based tools seem to be less relevant when identifying new products. This is a general trend irrespective of the company size and sector. Compared to the overall ranking illustrated above, the ranking of strategies did not change when responses were assessed only for SMEs. Looking at the data by sector, minor changes appeared. For example, compared to the overall sample, in the clothing/fashion sector sales agents were ranked above manufacturers.

When elaborating on their strategies to identify products, interviewees mentioned very similar approaches to those assessed in the survey, namely:

- Based on customer requests and market demand;
- Trade fairs, exhibitions or show rooms;
- Information and samples provided by the manufacturer;
- Sales agents, wholesalers/distributors or importers;
- General market screening and assessing the product range of competitors;
- Targeted internet research, e.g. browsing relevant blogs and fora.

Interviewees emphasized that they typically draw upon multiple approaches simultaneously. Medium-sized and large companies also mentioned to employ dedicated sales and marketing teams using a mix of strategies.

A number of companies pointed towards specialized trade fairs such as *Cosmoprof* Bologna or the *Spielwarenmesse* (toy fair) Nuremberg as one of the most effective approaches to identify new products. Representatives of the entire supply chain attend trade fairs regardless of the size of their company. Hence, trade fairs are important for establishing and maintaining direct contact with business partners.

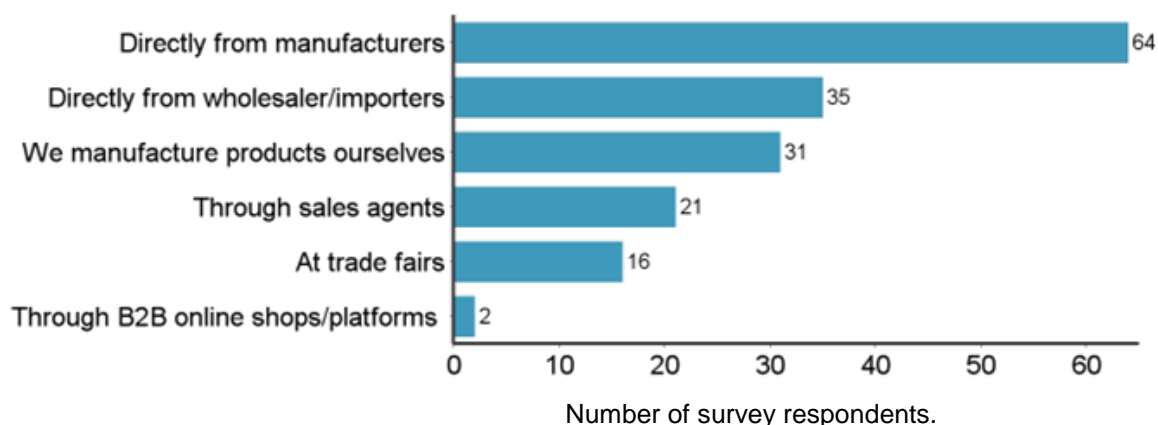
Like in the survey, companies stressed the importance of direct relationships with their business partners. Some companies added that they regularly visit their suppliers in order to see new products. Others pointed out that good working relationships with sales agents and buyers as well as wholesalers and importers ensure reliable access to products manufactured, for example, in China or India. Also direct customer relations were mentioned as an important source for the identification of products, in particular for small companies.

In contrast to the survey results, several interviewees mentioned internet research and the use of specialized digital media, for instance browsing catalogues of known manufacturers or wholesalers. Researching in online blogs and fora, however, is a rarely adopted strategy. Therefore, the impression from the survey persists that internet-based tools are less likely to be used.

To conclude, three strategies for identifying new products are popular across all sectors, namely identification of products at trade fairs, through manufacturers and through sales agents. Internet-based tools, such as blogs, competitor's websites and B2B online platforms, seem to be the least relevant in all sectors.

PRODUCT PURCHASE

Companies were furthermore asked to specify where they purchase their products. While interviewees elaborated freely, survey respondents could select multiple answers amongst the options provided. The following figure provides a ranking of purchasing strategies according to their frequency selected in the survey.

Figure 15: Approaches to purchase products.

Source: Civic Consulting survey of economic operators on RAPEX, N=82 Note: Multiple answers possible.

A majority of companies (64 or 78%) acquire their products directly from the manufacturer. Purchase from wholesalers/importers or manufacturing products themselves rank second and third (35 and 31), followed by sales agents and trade fairs (21 and 16). B2B online shops/platforms, such as Alibaba, seem to be of marginal importance as this option had been selected by only two companies. Responses confirmed the identified preference of companies for direct business relationships and a hesitation to rely on internet-based approaches. Assessing responses separately for SMEs and by sector did not considerably change the ranking described above.

Interviewees referred to strategies similar to those listed in the survey, namely:

- Direct purchase from the manufacturer;
- Direct purchase from wholesalers;
- Placing orders at trade fairs;
- Purchase through commercial agents or sales representatives; and
- Purchase through the internet.

Confirming once again the importance of personal relationships, direct purchases from manufacturers or from wholesalers and importers represent the dominant approaches to buy products. In contrast to the survey, a number of interviewees also mentioned to place orders at trade fairs.

When purchasing goods produced outside the EU, commercial agents or sales representatives seem to be the first choice. Several interviewees mentioned that their company works closely together with sales agents representing, for example, the Chinese toy industry.

Even though several companies did refer to purchasing online, a uniform approach of how the internet is used for acquiring products cannot be identified. Some interviewees mentioned to use the internet for placing an order to a known supplier. Others stated to visit the websites of wholesalers. None of the interviewees, however, mentioned B2B online platforms, such as Alibaba. On the contrary, one interviewee explicitly underlined that he would not consider using such platforms.

To conclude, as for the identification of products, also for their purchase personal relationships are particularly important. The internet seems to be only a technical tool used for placing orders to well-known suppliers rather than a strategy to diversify business approaches.

6.4. APPROACHES TO PRODUCT SAFETY

Key findings are:

1. In order to ensure product safety, companies mainly rely on legally required documentation from the manufacturer or the importer, respectively.
2. Careful selection of suppliers is more important than researching additional product safety information.
3. Internet-based approaches for ensuring product safety were selected only by 24% of the companies responding to the survey or less. Amongst internet-based sources RAPEX is the most important website to look at.

The following figure gives an overview of the sources of information companies participating in the survey indicated to consult in order to ensure the safety of their products.

Figure 16: Sources of information consulted to ensure product safety.



Source: Civic Consulting survey of economic operators on RAPEX, N=79. Note: Multiple answers possible.

The main source of information for companies are manufacturer (62) followed by certification/labels from independent testing organisations (48). With 43 responses,

information acquired from the wholesaler or importer ranked third. All three approaches were selected by a majority of respondents (i.e. 50% or more). The RAPEX website is ranked fourth, selected only by one fifth (19 or 24%) of the companies as a source of information. Nonetheless, it was still used by considerably more companies than all other internet-based sources (i.e. websites of national authorities, OECD Global Recalls, newsletters from business associations or consumer organisations), which were chosen by one tenth or less of the companies. One company indicated that it did not consult any source of information reasoning that it relies on business partners to ensure product safety. Other strategies mentioned in the free text field related to in-house testing, commissioning product tests, the control of production sites, and in-house quality assurance processes.

Looking at survey responses by sector confirms the overall assessment, that companies rely on information of business partners or trusted third parties. Manufacturers, labels from independent testing organisations and importers/wholesalers ranked among the first three sources of information across all sectors. In contrast, results for RAPEX vary across sectors. The toy sector, the cosmetics sector and the electrical appliance sector ranked RAPEX fourth. In the clothing/fashion sector and in the childcare articles sectors, RAPEX ranked sixth and seventh, respectively.

In order to gain further insights on the approaches to product safety, also interviewees had been asked to elaborate on their company's strategy. Whilst the results mainly reiterate those of the survey, some additional insights were collected. The following key points summarise the input provided by the companies interviewed:

- Product safety information is provided by the manufacturer;
- Labels/certificates relating to product safety are checked;
- Products are purchased from "trusted suppliers";
- Competent authorities/customs are trusted to check for product safety;
- Attention is paid to the packaging, information provided on the product and the translation of warnings;
- Commissioning or undertaking risk assessments/tests;
- Visits to the manufacturing sites;
- Customer feedback; and
- Internet research, including websites such as RAPEX or Product IP.

Many interviewees seem to be aware of the legal requirements of manufacturers to ensure and document product safety. Hence, their main approach to product safety consists in requesting this type of documentation from the manufacturer or importer, respectively. In addition, companies check labels certifying compliance with these legal obligations.

In the cosmetics sector companies seem to be well aware of the requirement to register all cosmetic products in the Cosmetics Product Notification Portal (CPNP) prior to their placement on the market. Some of the interviewees mentioned to check the CPNP registration of products systematically, whereas others indicated to only check it occasionally. Overall, information by trusted third parties (including customs authorities, certifying bodies but also known suppliers) seems to be the predominant approach of interviewees to ensure product safety.

Again the importance of direct business relationships was stressed. Often companies only buy products from "trusted suppliers". These suppliers (e.g. well-known brands) are

expected to have internal quality procedures in place such that their products do not need to be rechecked. In the view of companies, a careful selection of business partners is the best approach to ensure product safety. Some interviewees assumed that products from suppliers located in the EU would be safe in any case due to market surveillance and therefore considered additional measures unnecessary. Two interviewees from the clothing/fashion sector even felt that the issue of product safety did not apply to their business at all.

In terms of direct business relationships, several interviewees pointed out to also rely on customer feedback as an approach to product safety. If customers repeatedly complained about problems with a specific product, it would be excluded from the product range.

Only a small number of interviewees employ approaches to product safety in addition to those mentioned above. Some small companies wish to take a personal look at each product and pay attention to the packaging, the information provided on the product, and the translation of warnings. One micro company researches how products are presented on the manufacturer's website and which overall impression suppliers make on the internet. Particularly bigger companies (medium-sized and large) visit the manufacturing sites of the products they intend to purchase. More importantly, they also commission or undertake product safety tests and risk assessments. Only three interviewees mentioned the use of the RAPEX website as a strategy to ensure product safety.

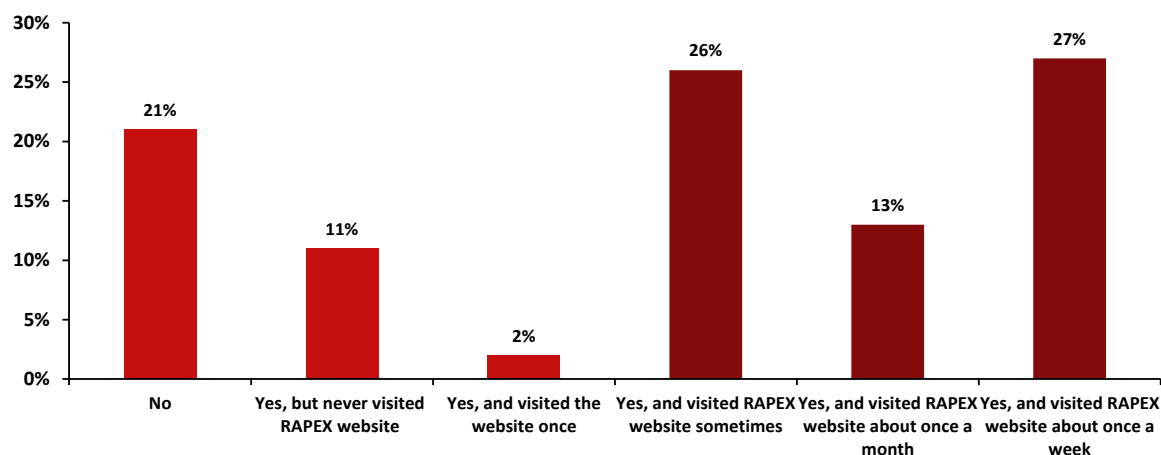
6.5. AWARENESS OF RAPEX

The key findings are:

1. 66% of the survey respondents are well aware of RAPEX, while 34% of the respondents are less aware of RAPEX. Awareness amongst interviewees regarding RAPEX is very mixed. Some interviewees use it regularly many others have never heard of the system before.
2. Almost half of the micro and small companies surveyed are less aware of RAPEX. 30% had never heard of the system before.
3. Respondents well aware of the RAPEX website use it as a monitoring tool, while respondents less aware of the RAPEX website see it as a tool to check individual products. Both groups consider the amount of information provided to be overwhelming.
4. Smaller companies do not have the capacity to regularly consult the RAPEX website and considered it a responsibility of their supplier to do so.

In order to examine the awareness of RAPEX, companies and business associations responding to the survey were asked whether they knew RAPEX before participating and if so how often they had visited the website. The following figure illustrates the results.

Figure 17: Knowledge of respondents about RAPEX before participating in the survey.

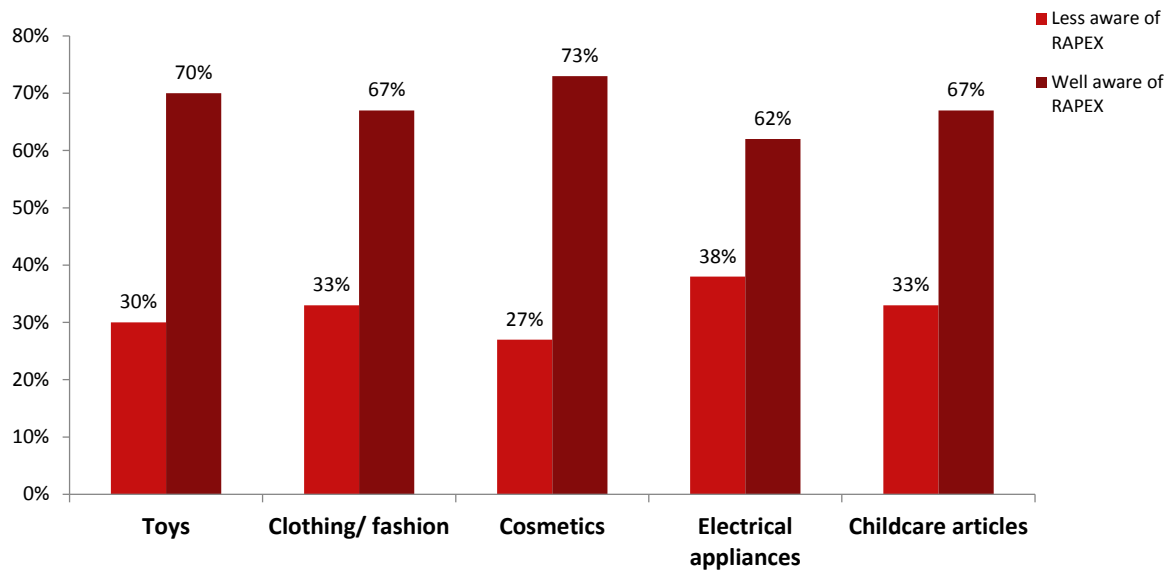


Source: Civic Consulting survey of economic operators on RAPEX, N=90.

Overall, 21% of the survey respondents had never heard of RAPEX, while 79% already knew about RAPEX before participating in the survey. 13% of the respondents had heard about RAPEX but had never (11%) or only once (2%) visited the website before. All others had regularly visited the website, though with differing frequencies: 26% of the respondents had visited the website sometimes, 13% once a month, and 27% once a week. Hence, 66% of respondents were well aware of RAPEX as they had visited the website more than once, while 34% of respondents were less aware of RAPEX as they had never heard of RAPEX or visited the website never or only once.

The following graph illustrates the awareness of RAPEX in the target sectors.

Figure 18: Knowledge about RAPEX by sector.

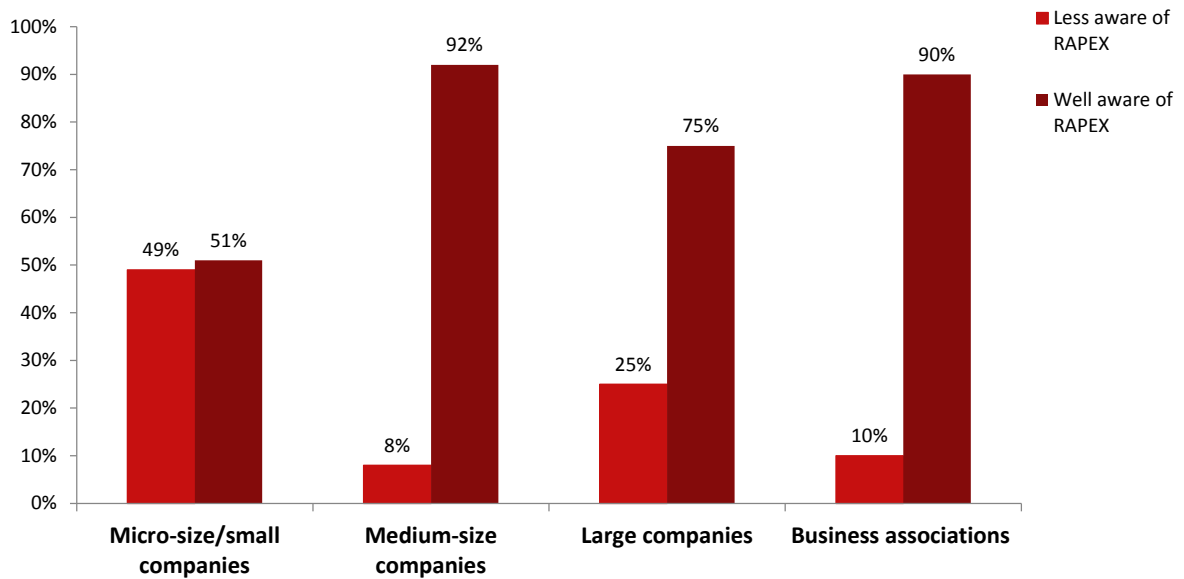


Source: Civic Consulting survey of economic operators on RAPEX, N=90. Note: Well aware of RAPEX are respondents who have visited the RAPEX website more than once, less well aware of RAPEX are all other respondents to the question.

As the graph shows, respondents in the cosmetics sector and the toy sector are most aware of RAPEX with 73% and 70% of respondents having consulted the website more than once. 67% of participants from the childcare article sector and from the clothing/fashion sector were well aware of RAPEX while only 62% of participants from the electrical appliances sector had visited the RAPEX website more than once before.

Assessing the awareness of RAPEX by company size reveals that 49% of micro and small companies were less aware of RAPEX. 30% had never even heard of the system before this study. Amongst medium-sized companies, only 8% of the participants were less aware of RAPEX, while this was the case for 25% of the large companies participating in the survey. Notably, also one survey participant of a business association had never visited the RAPEX website before. The following figure illustrates these results.

Figure 19: Knowledge about RAPEX by type of organisation/company size.



Source: Civic Consulting survey of economic operators on RAPEX, N=90. Note: Well aware of RAPEX are respondents who have visited the RAPEX website more than once, less well aware of RAPEX are all other respondents to the question.

It has to be noted that sample sizes for medium-sized and large companies as well as for business associations are rather small, with 14, 17 and 10 survey responses, respectively. The sample size of the group of micro/small companies is considerably bigger with 52 responses received in this group.

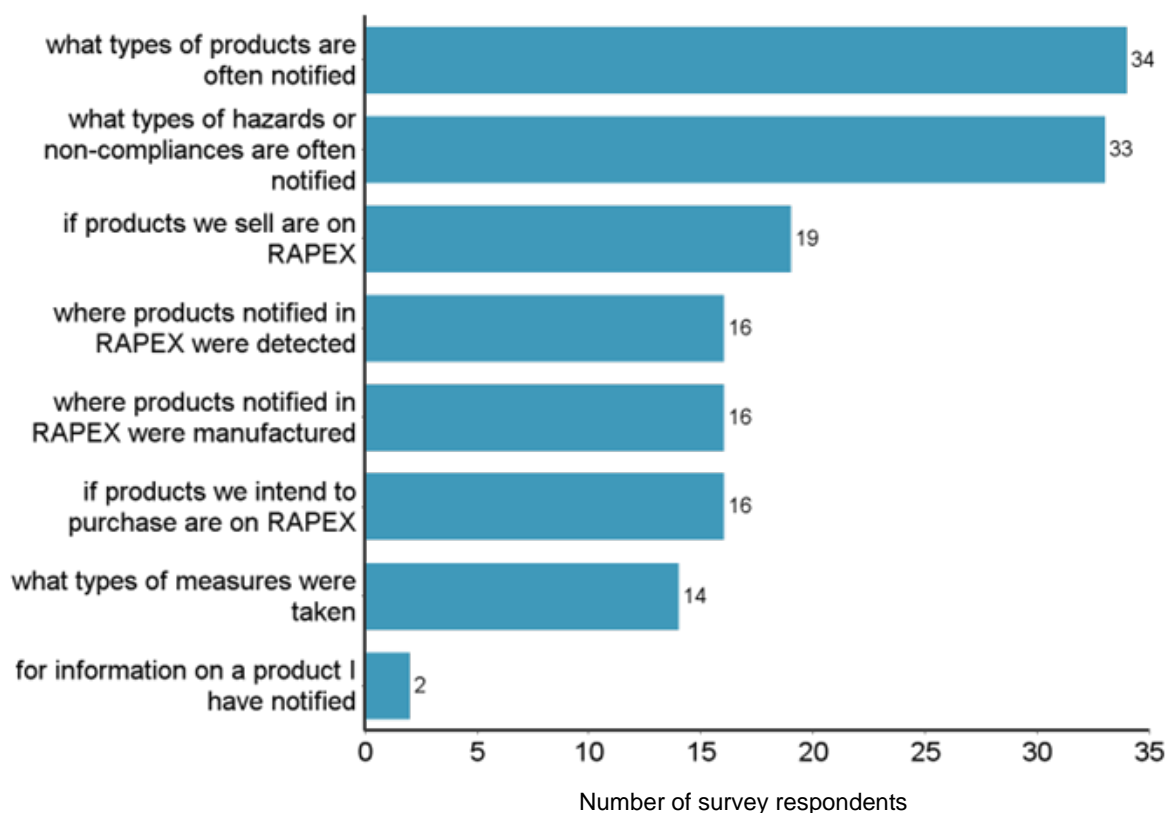
Contrary to the survey, knowledge about RAPEX amongst interviewees was very mixed. While some interviewees were familiar with the system and would use it on a regular basis, many others had never heard of the system before.

With the view of analysing the use of RAPEX information, the survey as well as the interviews inquired about the potential purposes of visiting the RAPEX website. To this end, respondents who were familiar with RAPEX (i.e. visiting the website sometimes, once a month or on a weekly basis) and those who were less aware of RAPEX (i.e. had visited the website only once, never or had never heard about RAPEX), had to answer different survey questions.

PURPOSES TO VISIT THE RAPEX WEBSITE OF WELL AWARE ECONOMIC OPERATORS

Respondents who had specified in the survey to be well aware of the RAPEX website were asked to elaborate on the reason why they had visited the website regularly in the past. Multiple answers were possible. The following figure depicts the results.

Figure 20: Purpose of operators for using the RAPEX website - operators well aware of RAPEX.



Source: Civic Consulting survey of economic operators on RAPEX, N=61. Note: Respondents were considered to be well aware of RAPEX if they had visited the RAPEX website more than once prior to participating in this study. Multiple answers possible.

The two main purposes to visit the RAPEX website consist in monitoring what types of products and in identifying what types of hazards or non-compliances are often notified. More than half of the respondents answering this question mentioned these two reasons (34 and 33, respectively). One third to one fourth of the respondents listed the following reasons: to check whether products, which the respondent sold were notified in RAPEX (19), where notified products were detected and where they were manufactured (both 16), if products, which were intended to be purchased were notified in RAPEX (16), and what types of measure were taken (14). Checking the RAPEX website for information on a product the respondent had notified is of minor importance.

Overall, survey responses indicate that the RAPEX website is more likely to be used to monitor product safety issues than to check on a particular product. The ranking did not change considerably when data was analysed by sector or by size of company. The two main purposes to visit the RAPEX website (i.e. to monitor the type of product and the type of hazard notified) remained the same, with one exception in the electrical appliances sector. Here checking in which country a product was notified ranked second, while monitoring the type of hazards notified came third. Participants providing responses as free text reported to visit the website for inquiring about competitors.

Interviewees who were well aware of RAPEX provided more detailed insights on the use of the RAPEX website. They discussed both reasons for using the website and reasons for considering the website impractical. The following points summarize the reasons for using RAPEX:

- RAPEX is a useful tool of monitoring developments in the sector;
- RAPEX helps to understand how legislation and standards are applied;
- RAPEX helps to manage relationships with suppliers and customers;
- RAPEX helps to ensure if a particular product is safe;
- RAPEX is a good reminder that checking product safety is important.

The following issues were reported regarding the impracticality of RAPEX:

- RAPEX is too time-consuming/not practical to use;
- The RAPEX data base is too broad making it impossible to identify relevant information;
- RAPEX information is not relevant for the company's operations; and
- National authorities are more trustworthy than European initiatives.

Those companies who consider RAPEX as a beneficial monitoring tool also use it as a valuable source of information about product safety developments relevant for their business. For example, if the same type of product is repeatedly notified with similar hazards it gives rise to check whether these issues could also occur in their own company. Furthermore, interviewees appreciate that the RAPEX website offers practical examples on the application and implementation of products safety regulations and standards and helps to stay up-to-date with legal requirements and developments.

Several interviewees stated that RAPEX information was also very helpful in terms of managing business relationships. On the one hand, companies use the RAPEX website as an instrument to monitor the performance of suppliers. One interviewee explained that if products included in his supplier's assortment were repeatedly subject to RAPEX notifications, he would put the credibility of this supplier into question and take measures accordingly.

On the other hand, keeping up-to-date with RAPEX notifications might be an important preparation with respect to customer requests. One interviewee mentioned to sometimes receive questions from customers on very specific issues of their products, e.g. ingredients. Often these types of requests relate to a notification published on the RAPEX website, for example on the violation of the maximum legal level of the ingredient. The awareness of the notification helps the company to adequately respond to the customer's request.

Whilst interviewees regularly using the RAPEX website appreciate its potential as a monitoring tool, they also mentioned several drawbacks of the website. First and foremost, the amount of information provided on the website appears to be a major concern. Finding the relevant information seems difficult because many notifications relate to minor non-compliances and not to those hazards posing serious threats to the health and safety of consumers. Many companies described the website as impractical, unclear and too time-consuming to use. Nonetheless, for some interviewees the benefits of the RAPEX website outweigh its drawbacks.

In particular smaller companies do not have the capacity to regularly consult the website. They consider the information more relevant for bigger companies or manufactures and importers. Interviewees even argued that it was the obligation of their suppliers to check the RAPEX website. In addition, some interviewees doubt a European approach in the first place. For them national authorities are more trustworthy.

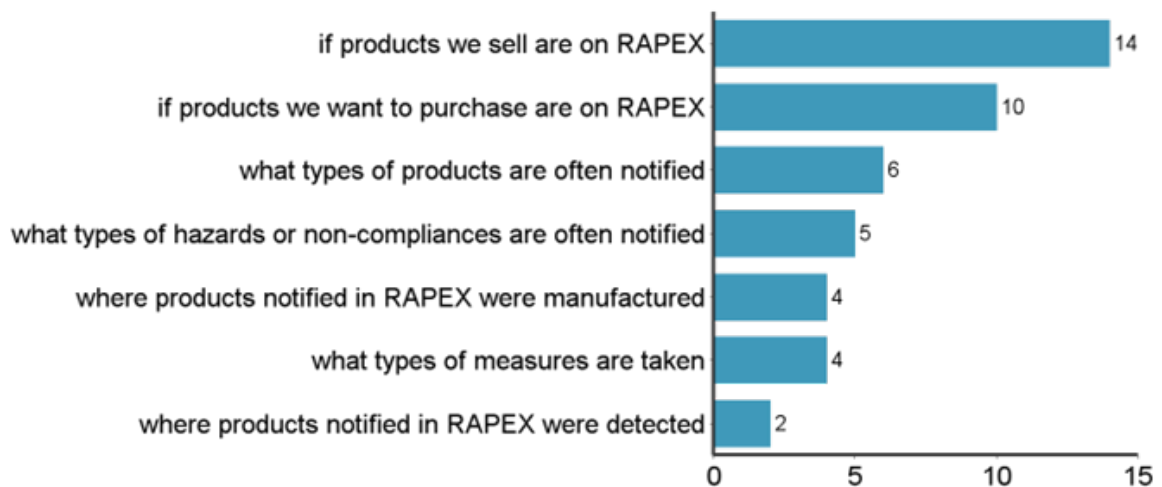
It is worthwhile mentioning that most companies do not use the RAPEX website as a tool to systematically check the safety of individual products. Only a few interviewees consult RAPEX in this regard should they receive a complaint on a safety issue. The perception of RAPEX as a monitoring tool prevails.

PURPOSES TO VISIT THE RAPEX WEBSITE OF LESS AWARE ECONOMIC OPERATORS

Survey respondents less aware of RAPEX were invited to briefly browse through the RAPEX website after having received the respective internet link. Interviewees less aware of RAPEX could either take a look at the website or received further explanations from the interviewer.

Both survey respondents and interviewees were then asked why they would consider revisiting the RAPEX website in the future. The following figure illustrates the results of survey participants.

Figure 21: Purposes for revisiting the RAPEX website of less aware operators.



Source: Civic Consulting survey of economic operators on RAPEX, N=23. Note: Respondents were considered to be less aware of RAPEX if they had visited the RAPEX only once or less. Multiple answers possible.

This time, the most frequent reason to revisit the RAPEX website was to check whether products respondents sold had been notified (14). Furthermore, respondents are likely to check if products they plan to sell are notified (10). In contrast, only one fourth or less of the respondents mentioned the types of products, hazards/non-compliances or countries of origin often notified in RAPEX as a reason for revisiting the RAPEX website. These results show that, contrary to survey respondents well aware of RAPEX, respondents less aware of RAPEX considered the website rather a tool to check for individual products than to monitor product safety issues systematically. When evaluating responses by sector, for the toy sector and the electrical appliances sector it seems to be more important to

verify the type of hazards often notified than if products intended to be purchased are safe. Hence, in these two sectors monitoring hazards and non-compliances was ranked second. In any case, respondents of all sectors ranked the reason to check if products sold by them are notified first.

Feedback from interviewees less aware of RAPEX related to the following points:

- RAPEX could be useful to check the quality of particular products;
- The website seems too complex and time consuming to use; and
- Information is not relevant for the company.

Several interviewees, who had never heard of RAPEX before, indicated after they had received an explanation by the interviewer that it sounded like a useful tool to check if a particular product was safe. Interviewees declared that they would take a look at the website after the interview to see whether it was useful to them. It has to be noted that one interviewee, who had actually taken the opportunity to visit the website before the interview, had been overwhelmed by the complexity of the website and would not know what to do with it.

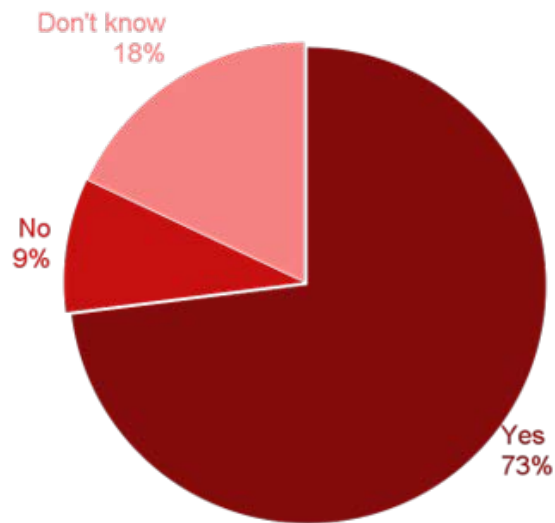
Some interviewees were concerned that regardless of the usefulness of the website, time constrains in small companies would not allow the use of such tools. One interviewee pointed out that a systematic check is not feasible due to the large number of products included in his product range. Several interviewees are satisfied with their current approach to product safety and regard information provided on the RAPEX website as not relevant for their business. They admitted, however, that it could be relevant for their suppliers.

To conclude, there is a considerable difference in perception between companies well aware of RAPEX and companies less of RAPEX. While companies regularly using the RAPEX website emphasize its benefit as a monitoring tool, companies learning about RAPEX for the first time perceived the website rather as a tool to check individual products.

USEFULNESS OF THE RAPEX WEBSITE

While interviewees had already provided some indications, in the survey, the usefulness of the RAPEX website to respondents was examined separately. Results are illustrated in the following figure.

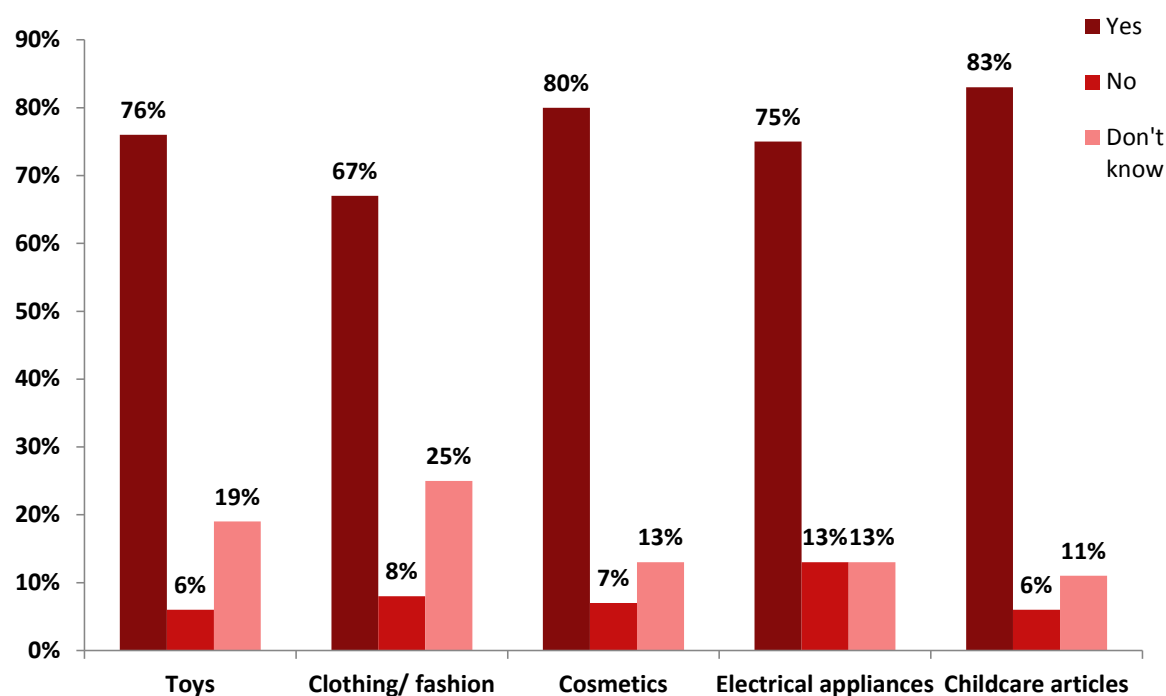
Figure 22: Usefulness of the RAPEX website.



Source: Civic Consulting survey of economic operators on RAPEX, N=88.

Of the 88 respondents providing an answer to this question, an impressive majority of 73% or 64 respondents considered the RAPEX website useful. 18% or 16 respondents did not have an opinion and only 9% or 8 respondents indicated that the RAPEX website would not be valuable to them.

This result was replicated when looking at the data by sectors or company sizes. As the following figure illustrates, RAPEX is considered beneficial particularly in the toy sector, the cosmetics sector, and the childcare article sector. The website seems to be slightly less useful for the electrical appliances sector as well as for the clothing/fashion sector.

Figure 23: Usefulness of the RAPEX website by sectors.

Source: Civic Consulting survey of economic operators on RAPEX, N=88.

Amongst micro-size and small companies, 70% of respondents appreciate the RAPEX website, which is slightly less than the average of 73% of all respondents. 81% of large companies and 75% of medium-sized companies consider the website to be helpful. Amongst business associations, 70% of the respondents regard the RAPEX website as of value to them.

The 8 survey respondents considering the RAPEX website not useful indicated a variety of reasons for their assessment. Half of the respondents considered the website not to be relevant for their business. The RAPEX website was furthermore assessed as too time-consuming to use, not user friendly, not understandable due to the language, not comprehensible due to the formal wording, or the information provided did not help to identify unsafe products.

6.6. UPTAKE OF THE RAPEX WEBSITE

The key findings are:

1. A variety of improvements relating to the content and functionality of the RAPEX website would increase the use of the website by economic operators.
2. Improving general awareness regarding product safety is indispensable for successfully promoting RAPEX.
3. Companies consider national authorities and business associations the most effective communication channels to promote RAPEX.
4. Regardless of the communication channel, the information and message provided needs to be targeted, concise, and comprehensible.

SUGGESTIONS FOR IMPROVING THE RAPEX WEBSITES

Respondents of the survey had the opportunity to provide suggestions to improve the RAPEX website in a free text format. Overall, proposals related to four basic categories (see also Annex IV):

- The operation of the RAPEX website;
- The content provided on the RAPEX website;
- The weekly RAPEX alerts; and
- Suggestions related to the risks of products notified.

As to the operation and functionality of the website, survey respondents stated it would be helpful if the website was translated into their native language. Information displayed on the website should be presented in a more clustered form, e.g. according to different categories such as product types or sectors. Furthermore, a number of suggestions requested to improve the search function, for example implementing the possibility to filter notifications by categories. Some respondents complained about the amount of information provided on the website.

Regarding the content of the RAPEX website, survey participants pointed out that the information provided to identify a product was often insufficient and incomplete. Moreover, respondents argued that the information displayed was difficult to comprehend. For example, definitions of categories describing a product (e.g. toys, cosmetic) or the hazard/risk seem to be unclear and cannot be found on the website. In addition, the information provided on the risk of a product was not considered helpful for understanding the root cause of the alert. Therefore, respondents made suggestions for additional categories of information, including the number of products affected, supplier information or the link to the legal document, on which the alert has been based.

Regarding the weekly email alerts, respondents experienced difficulties with the registration.

Several suggestions related to the risks categorization of products. A number of respondents pointed out, that the information provided on the website did not make apparent why a product was considered a "serious risk". This provided ground for misinterpretation. Respondents suggested that notifications should be filtered better prior to their publishing on the website. Only products with high risks were recommended to be included in the weekly reports. Related to the misinterpretation of information, respondents furthermore suggested providing more information on the implications of the risk including for example the risk assessment of the notified product on the website.

Interviewees provided further details on the proposals for improving the RAPEX website made by survey participants and added a number of suggestions. The following key points summarise the discussion with interviewees:

- Notifications should be filtered better;
- More information on the reason for a notification should be provided;
- Descriptions of products needs to be improved;
- Information provided should be more clustered;
- The website design should be improved;
- Similar websites should be established at the national level;
- Information provided on the RAPEX main page could be improved; and
- Weekly email alerts could be improved.

More filtering of notifications prior to their publication on the RAPEX website would help to contain an overflow of information. Interviewees felt that published product notifications increasingly related to very minor non-compliances of EU regulations or even only to national standards not applicable in all Member States. While interviewees did not question the need to act upon these violations, they raised the concern that the overflow of information provided on minor issues distracts from the important information on products which pose direct and very serious health and safety risks for consumers. Hence, it would be more beneficial to publish a careful selection of serious and relevant notifications instead of publishing all alerts. At the same time, interviewees felt that more information should be provided on the reason for a notification. According to a number of interviewees, explanations provided on the website are often vague making it difficult to understand the risk and to learn from it. One interviewee requested that a clear definition of risk levels should be provided on the website. Furthermore, risk assessments could be added to the notification. Another interviewee asked for links to the legal standards referred to in a notification as well as other relevant documents, e.g. opinions of the Scientific Committee of Consumer Safety (SCCS). According to the interviewee, currently it is very time consuming to interpret the information provided on the risk of a product. A lot of additional research has to be undertaken by companies to make sense of the information. The interviewee felt that the European Commission would have easily access to this kind of information and could provide a lot of assistance to companies if they would link it on the RAPEX website.

Another suggestion related to the description of products. In principle, the categories describing the product as foreseen on the website are sufficient. Practically, however, the information seems to be often incomplete. One interviewee pointed out that as a minimum the European Commission could provide a high resolution picture of the product.

With regard to the overflow of information, more clustered information would be beneficial, in particular according to sectors, types of products, or standards violated.

In terms of the functionality of the website, some interviewees proposed improving the visual structure of the RAPEX website with the help of shorter texts and more targeted information. As one interviewee explained, visitors of the website should not be overwhelmed or even deterred by the complexity of the main page. The interviewee also mentioned that it was important to publish information mindful of search terms. Otherwise the search function would stay ineffective.

Some interviewees suggested establishing websites on the Member State level or at least strengthening the link to national authorities.

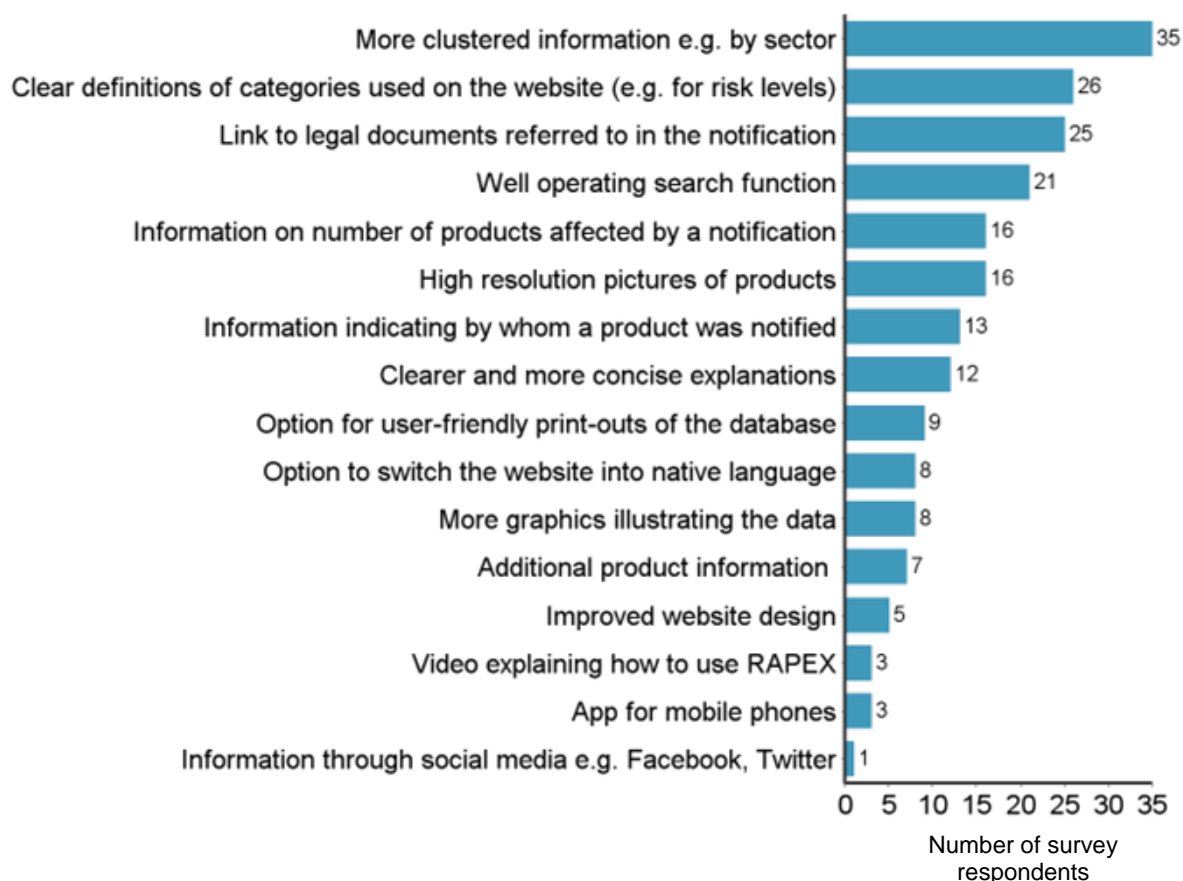
Several suggestions referred to the information provided on the main page. One interviewee felt that the section “related documents” could link also to more sector

specific information, such as the Cosmetics Directive. Another interviewee mentioned that the contact information to the RAPEX team of the European Commission should be provided in a more prominent spot on the website. Finally, some interviewees considered it would be useful to publish guidelines for companies on various aspects of product safety, including on the obligations of companies and the use of RAPEX. One interviewee suggested providing instructions on the website how to proceed if a company had identified a dangerous product.

Finally, several interviewees requested to have more targeted email alerts. Some considered it helpful to be able to choose for which sector they receive notifications. Others would prefer a summarised monthly notification instead of weekly alerts.

Survey respondents were asked (after they had made proposals in a free text field) to select from a list of options their top three items which would increase their use of the RAPEX website. The following figure illustrates the ranking of the provided options.

Figure 24: Components increasing the use of RAPEX.



Source: Civic Consulting survey of economic operators on RAPEX, N=79. Note: Up to 3 answers possible.

More clustered information, clearer definitions of the categories used on the website, and the link to legislation and standards referred to in the notification are the top three items, as a means of increasing the use of the RAPEX website (selected by 35, 26 and 25 respondents, respectively). In line with companies' reluctance to use internet-based

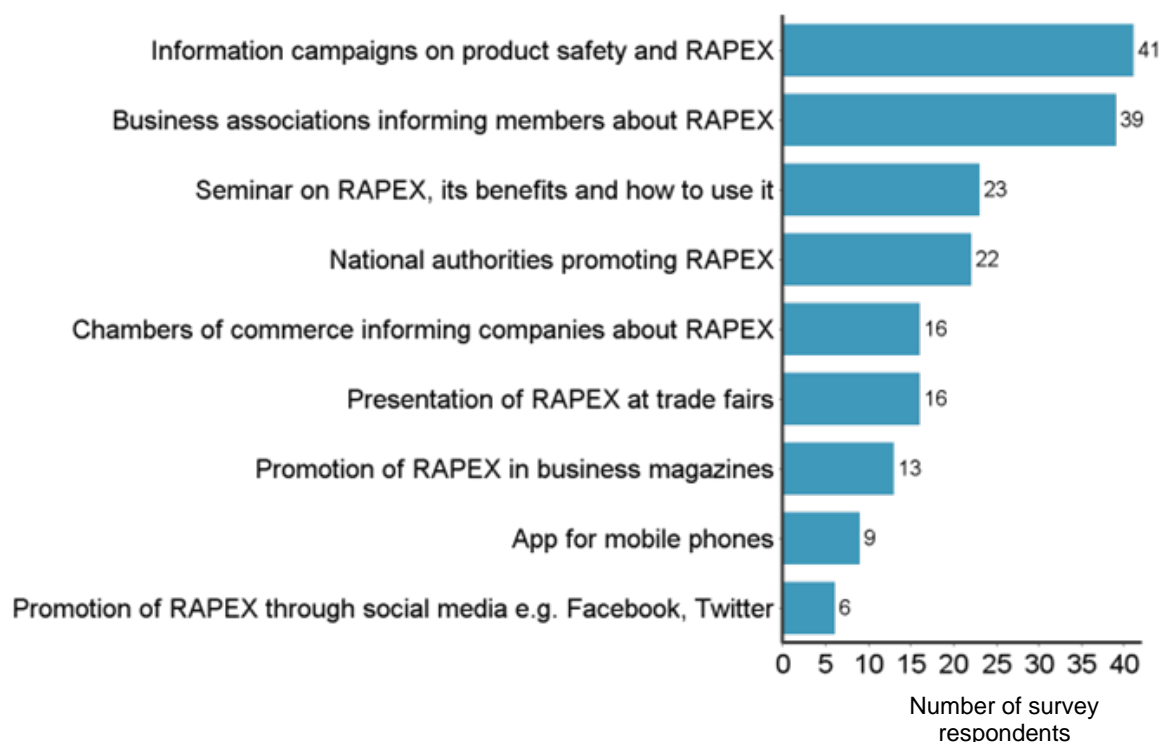
technologies, the least popular measures to promote RAPEX information are social media (1), an app for mobile phones (3) and a video explaining how to use RAPEX (3). Overall, none of the options was selected by a majority (i.e. 50% and more) of the respondents to this question.

Assessing the responses by sector or by company size did not profoundly change the ranking displayed above. None of the components was supported by the majority of respondents in a sub-group. Frequencies of selection did not differ considerably between the different items. The only clear trend was that internet-based suggestions (i.e. social media or an app for mobile phones) always ranked amongst least frequently selected items. In conclusion, a variety of improvements relating to the content and functionality of the RAPEX website could potentially increase its use.

SUGGESTIONS FOR PROMOTING THE RAPEX WEBSITES

The survey participants were able to select up to three answers from a predefined list. The following figure presents the strategies ranked according to the frequency of their selection.

Figure 25: Strategies to promote RAPEX.



Source: Civic Consulting survey of economic operators on RAPEX, N=79. Note: Up to 3 answers possible.

Information campaigns on product safety, including on RAPEX, are considered the most effective strategy to promote the use of RAPEX information, with the majority of the respondents selecting this strategy (41 out of 79), followed by business associations informing members about RAPEX (39). Seminars on RAPEX, national authorities promoting RAPEX, the presentation of RAPEX at trade fairs, chambers of commerce informing on RAPEX, and the promotion of RAPEX in business magazines ranked third to

seventh. An app for mobile devices and the promotion of the RAPEX website through social media were regarded as least effective.

Evaluating survey responses by sector or by size of companies confirmed the above-mentioned results. Information campaigns on product safety and the promotion of the RAPEX website through business association are always amongst the three most effective strategies whilst apps for mobile devices and social media have hardly been endorsed.

When discussing potential strategies to promote the RAPEX website with interviewees, a large number of respondents stressed the importance to first improve general awareness on product safety. Several interviewees felt that in particular small and micro-size companies were not aware of the importance of product safety and had little to no knowledge on their legal obligations. One interviewee mentioned the example of small beach shops that would not even realise that they sell products falling under the Toy Safety Directive. These types of businesses are very difficult to reach and hardly concerned about product safety. Therefore, many interviewees felt that a general campaign on product safety involving all relevant stakeholders such as national authorities, business association etc. would be necessary. In this regard, one interviewee suggested establishing regular meetings between national authorities and businesses as a good approach to promoting product safety.

Information on the obligations of companies regarding product safety should be presented more targeted and in easily accessible step-by-step guides. Many companies felt that it was too difficult to collect all relevant information on their legal obligations themselves as the information was scattered across too many documents. As one interviewee suggested, such information could be collected on one dedicated website or in leaflets and brochures provided for example by business associations.

In terms of potential channels to promote RAPEX, interviewees made the following suggestions:

- National authorities;
- Business associations;
- Trade fairs; and
- Promotion through customers.

A large number of interviewees consider national authorities as an effective way to increase the awareness about the RAPEX website. In addition to the promotion of the website itself, several interviewees also considered it to be the duty of national authorities to process RAPEX information and to provide a summary of this information to companies directly.

A second channel of communication frequently mentioned in the interviews was business associations and in particular their regular newsletters and magazines. Some interviewees pointed out that they had regularly received information on RAPEX from their business association. However, other interviewees claimed that product safety, including information on RAPEX, had not been a frequent topic in the newsletters or magazines of their business association. Hence, mobilizing business associations to distribute information on RAPEX through in their communications to members might be a successful strategy for promoting the RAPEX website.

Some companies discussed the potential of promoting the use of RAPEX information at trade fairs. Interviewees were of different opinions with respect to the effectiveness of this approach. One interviewee from a medium size company expressed his doubts about

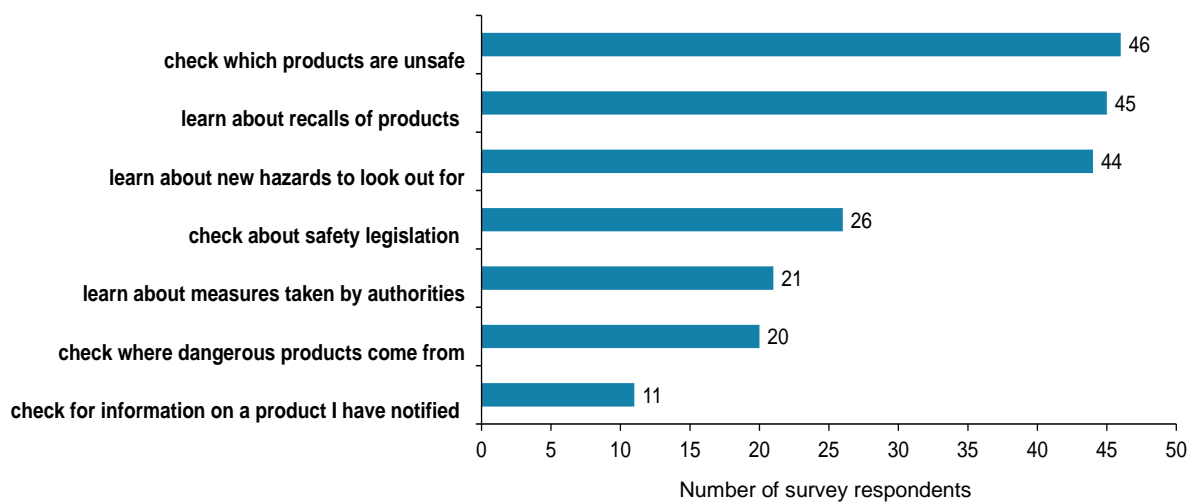
trade fairs as an effective channel to promote the RAPEX website because allegedly product quality managers would not attend. In his point of view a more promising strategy to promote RAPEX would always have to be targeted at quality managers. In stark contrast some interviewees from smaller companies, stated that trade fairs would indeed be a very effective platform to promote the use of RAPEX information since they gather many companies of the same sector. Taking into consideration that in small companies sales and product quality assurance is often the responsibility of the same person, the relevant audience would be present at trade fairs.

Overall, all interviewees emphasized that regardless of the communication channel, the information provided would need to be targeted, concise, and comprehensible.

KEY BENEFITS OF THE RAPEX WEBSITE

With the view of identifying potential messages to promote the use of RAPEX information survey respondents were finally asked to prioritise important features of the RAPEX website. The aim was to gain insight on its perceived benefits. The following figure illustrates the results.

Figure 26: Most important features of RAPEX.



Source: Civic Consulting survey of economic operators on RAPEX, N=82. Note: Up to 3 answers possible.

The three most important benefits of the RAPEX website are to check, which products are unsafe, to learn about recalls of products, and to get information about new hazards. All three items have been selected by more than half of the respondents (i.e. 46, 45 and 44 out of a total of 82, respectively). To check about product safety legislation, to learn about measures taken by authorities and to check where dangerous products come from were each selected by around one fourth of the respondents. Only 11 respondents considered the RAPEX website to be valuable for checking information on products they had notified.

Analysing responses by sectors confirmed the average ranking shown above. Notably, micro-size and small companies considered the first four (not only the first three) features almost equally important. Hence, in comparison to the overall ranking these companies also value the possibility to learn about product safety legislations they have

to comply with. Overall, responses supported the results discussed above namely that the RAPEX website is a useful tool to broadly monitor product safety issues.

7. CONCLUSIONS: TARGET GROUPS, ACTIONS AND RECOMMENDATIONS

This section presents the main results of the analysis and sets out recommendations. Three distinct target audiences of the RAPEX website are identified, which leads to a number of specific possible actions and key messages to reach out to them.

Key conclusions:

1. Amongst economic operators, there exists a considerable difference in the level of awareness of product safety in general and of RAPEX in particular, resulting in different needs and expectations towards the RAPEX website.
2. Based on the differences in the awareness of the RAPEX website, economic operators can be clustered into three target audiences: Regular users, unaware non-users, and reluctant non-users.
3. Depending on their needs and expectations, each of the three target audiences has to be addressed on the basis of distinct suggested actions and key messages.
4. For regular users, improving the RAPEX website is of paramount importance in order to make use of the website's full potential as a tool for quality management.
5. Amongst unaware non-users efforts should be directed towards both awareness raising on product safety in general and on RAPEX in particular.
6. Reluctant non-users can be convinced of the usability of the RAPEX website by means of awareness raising and the improvement of the website itself.
7. From the analysis, two general sets of recommendations for promoting the use of RAPEX information emerge: (1) improving the RAPEX website and (2) running awareness-raising and stakeholder involvement activities.

7.1. IDENTIFICATION OF TARGET AUDIENCES

This sub-section elaborates on three different target audiences worth considering for promoting the use of RAPEX information. Based on the differences in the knowledge and awareness of the RAPEX website, economic operators are grouped into target audiences and subsequently described with respect to their main characteristics.

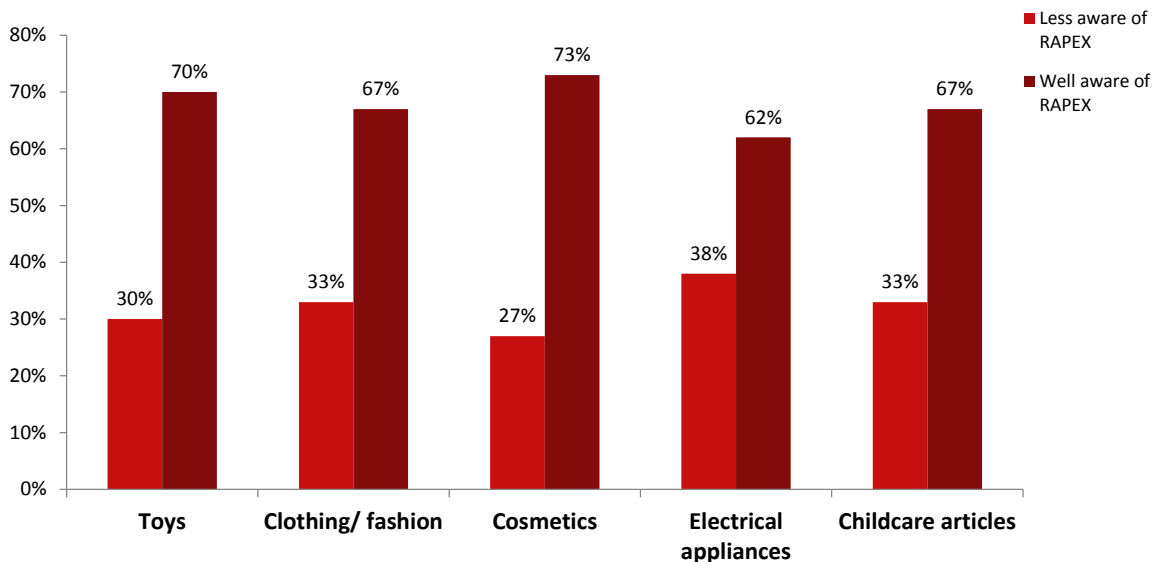
AWARENESS AND KNOWLEDGE ABOUT RAPEX

In general, the study showed that companies and business associations consider the RAPEX website as an additional source of information on product safety whilst they indicate manufacturers, labels from independent certifying bodies as well as importers and wholesalers as their primary sources of product safety information (see Section 6.4).

Nonetheless, the majority of survey participants stated that they are familiar with the RAPEX website. As discussed in Section 5.5, 66% of the respondents consulted the website more than once prior to this study, compared to 34% who either visited the website only once (2%), who never visited but were aware of the RAPEX website (11%) or who had never heard of RAPEX before (21%).

When comparing the level of knowledge of RAPEX across sectors (see Section 6.5), it becomes clear that a solid majority of businesses operating in the toys sector (70%) and in cosmetics (73%) seems familiar with the RAPEX website, using it as an instrument to systematically monitor notifications of unsafe products.

Figure 27: Knowledge about RAPEX by sector.

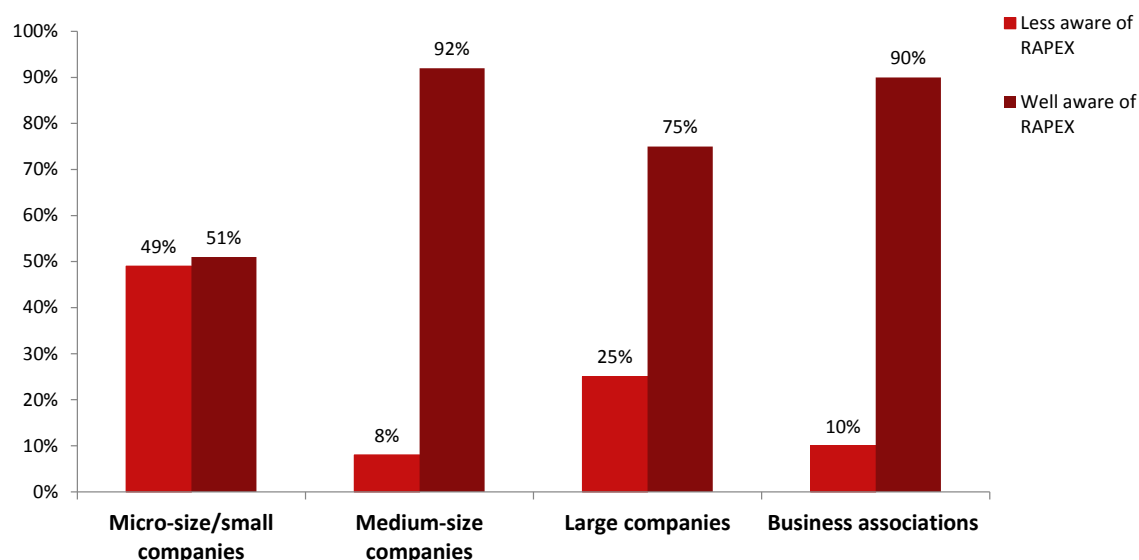


Source: Civic Consulting survey of economic operators on RAPEX, N=90. Note: This figure is also displayed as Figure 18 (Section 6.5.) of this report.

For these two sectors, the percentage of businesses being less aware of the RAPEX website amounts to no more than 30%. Surprisingly, in the electrical appliances sector 38% of businesses are less aware of the RAPEX website even though respective European product safety legislation is in place for decades. As to the sectors of childcare articles and clothing/fashion, the percentage of non-users drops to 33% with 67% consulting the RAPEX website on a regular basis.

When matching the level of knowledge with the type of organisation and the company size, as discussed in Section 6.5, the result is a striking difference in the level of knowledge about the RAPEX website between micro- sized and small businesses on the one hand and medium-sized and large companies as well as business associations on the other hand.

92% of medium-sized companies (i.e. companies with not more than 250 employees and 50 million € annual turnover) and 90% of business associations are acquainted with the RAPEX website. The findings for large companies are less compelling but there is still a solid majority of 75% using the website on a regular basis.

Figure 28: Knowledge about RAPEX by type of organisation/company size.

Source: Civic Consulting survey of economic operators on RAPEX, N=90. Note: This figure is also displayed as Figure 19 (Section 6.5.) of this report.

While there is an outright awareness of RAPEX information amongst medium-sized companies and business associations, the share of small and micro-sized enterprises not knowing about the RAPEX website amounts to 49%. Also a large number of the interviewed companies, who identified themselves as micro and small businesses, stated that they neither had visited the RAPEX website nor received the weekly email alert nor the RSS service. Only a small number of the small and medium size economic operators interact with the RAPEX website on a regular basis.

Nevertheless, a number of study participants are familiar with the RAPEX website and can be considered *regular users*. For the purpose of this study it seems, however, useful to examine in more detail those who are not using the RAPEX website.

Economic operators stated two types of reasons for not consulting the RAPEX website. One reason was unawareness of the RAPEX website. Companies indicated that they had never heard of the RAPEX website before, admitting however, after a short explanation by the interviewer, that it could provide useful information to them. Companies belonging to this group can be characterised as *unaware non-users*. Another reason to not visit the RAPEX website was reluctance.

A number of companies knowing the RAPEX website stated to be reluctant to use it. Reasons were various: The mistrust towards European initiatives, a shortage in available resources at the companies end and the complexity of the RAPEX website, and the alleged irrelevance of the information provided on the website to their business. These companies can be described as *reluctant non-users*.

TARGET AUDIENCES

Three types of target audiences emerge from the analysis of the awareness of the RAPEX website: first, regular users of the RAPEX website, second, non-users who are unaware of the RAPEX website and third non-users who are reluctant to use the website. In the following, the three target audiences are characterised in further detail.

Regular users

Regular users visit the RAPEX website routinely in order to inform themselves about new developments in product safety. As discussed in Section 6.5, reasons to visit the RAPEX website are diverse. They include:

- Monitoring the types of products and types of risks and non-compliances often notified;
- Checking whether products, which the respondent sells, are notified in RAPEX;
- Observing where notified products were detected and where they were manufactured;
- Ensuring that products, which are intended to be purchased, are not notified in RAPEX; and
- Monitoring what types of measure were taken by authorities.

The analysis shows that regular users perceive the RAPEX website as a tool for monitoring product safety developments in a sector and managing business relationships with suppliers as well as customers.

Typically, large and medium-sized companies as well as business associations are regular users of the RAPEX website. These economic operators emphasised that they have the capacity and willingness to dedicate a considerable amount of time to product safety and quality management. They use the RAPEX website as an important source to monitor their sector.

Some smaller companies also report to be regular users of the RAPEX website. They indicated in their responses, however, that their use is less frequent compared to large companies. While one large toy retailer for example consults the RAPEX website on a weekly basis, a small cosmetics wholesaler is browsing the website only once every month or every two months. Other companies rely on the RAPEX information provided through their business associations.

Unaware non-users

The second target audience includes companies who tend to be unaware of the existence of the RAPEX website and claim that they had never heard of RAPEX. In particular small and micro-size companies across all sectors belong to this target audience.

One reason for the lack of awareness seemingly coincides with the general finding of the study that companies trust their business partners when it comes to product safety, in particular when the manufacturer is located in Europe and/or is a well-known brand (see Section 6.3). Companies reported that proactively researching product safety information is not part of their business approach. Hence, sources of such information, including the RAPEX website, are unknown.

As far as micro and small business are concerned, the analysis revealed another critical factor. Unaware non-users often lack awareness of product safety and of related legal obligations in general terms. Hence, they do not even see the need to look into product safety issues or to consult additional sources on unsafe products. For instance, one interviewee explicitly stated that he would only sell the products and that safety and health issues were a problem to be handled by the manufacturer.

Along the same line, business associations and large companies argued that micro and small companies often do not have the capacities – neither in terms of staff nor in terms

of time and money – to cover all regulations relevant for their businesses. Hence, they tend to expect their suppliers to take care of product safety.

Several companies belonging to the category of unaware non-users expressed considerable interest in the RAPEX website once introduced to it. For example, a wholesaler in the toy sector stated that in principle the concept of the system caught his interest and that some of the information on the RAPEX website would be useful for his company. Similarly, another wholesaler in the cosmetics sector concluded that RAPEX could be a quick and easy way to learn about products on the market that do not comply with safety regulations. Overall, a number of companies was open to learn about the RAPEX website and stated that they would appreciate assistance in product safety issues. Hence, the group of unaware non-users has a considerable potential to develop into regular RAPEX users. This is also supported by the survey results with 73% of the survey participants considering RAPEX useful either based on their own experiences as regular RAPEX users or after having visited the website in the course of this study (see Section 6.5).

Reluctant non-users

The third target audience is the group of reluctant non-users. It consists of companies who are aware of the RAPEX website but do not use it for various reasons. Since this group is particularly heterogeneous, these companies are difficult to characterise in terms of size or sectors. Businesses belonging to this target audience can be found amongst small as well as medium-sized and large companies.

Reasons for the reluctance to use the RAPEX website vary. For some companies the same arguments apply as those listed for the group of unaware non-users, such as limited resources, lack of knowledge on product safety in general and reliance on business partners.

In addition, this group encompasses:

- *Companies that do not have a proper understanding of the RAPEX website, its objectives, functions and features:* For example, several companies were convinced that product safety and the use of the RAPEX website was not their responsibility but rather the duty of their suppliers. A few companies believed that the RAPEX website is meant for national authorities and not for businesses. Finally, some companies claimed that the RAPEX website was harmful to their business and referred to negative media coverage on the topic as a reason for not using the RAPEX website.
- *Businesses that prefer to rely on national authorities:* For instance, a number of companies mentioned that they trust the authorities in their home country more than European authorities when it comes to compliance with legal obligations. Hence, they had no interest in the RAPEX website.
- *Businesses that are reluctant and dissatisfied after having used the RAPEX website:* Several companies stated that searching the RAPEX website is too time consuming and too complex, in particular when trying to identify relevant information. Furthermore, some businesses considered the information provided on the RAPEX website as incomprehensible and therefore its use as a waste of their resources.

7.2. TARGETED ACTIONS AND MESSAGES

This section elaborates on effective targeted actions and key messages to address the three target audiences. It takes into account their respective needs and expectations towards the RAPEX website as well as appropriate communication channels and the involvement of relevant stakeholders.

EXPECTATIONS OF TARGET AUDIENCES

The group of companies that use RAPEX information on a regular basis (i.e. regular users) has concrete expectations towards the website and how to improve it based on their practical experiences. These suggestions are discussed below.

In contrast, expectations for the group of unaware non-users are more difficult to identify. Businesses falling in this category are less concerned and less informed about product safety in general and thus not aware of the existence of the RAPEX website. They tend to delegate the responsibility and expect their business partners to take appropriate measures in order to ensure product safety and compliance with legal obligations. Almost half of the interviewed micro-sized and small businesses belong to this category. Unaware non-users hold a considerable potential as future RAPEX users. Companies of this category are generally open to learn about the RAPEX website, as they appreciate easy and comprehensible guidance on product safety issues. Many companies when having learned about RAPEX in the course of this study considered it a useful tool of information on unsafe products.

In terms of needs and expectations, the category of reluctant non-users is yet again the most heterogeneous group. These companies know about the RAPEX website or have even used it in the past but are either dissatisfied with its current features or do not have a proper understanding of the purpose and functioning of the RAPEX website. In addition, some of the companies prefer to rely on the information provided by national authorities. They tend to expect national authorities to distribute RAPEX information rather than collecting the information themselves through a European website. To a certain extent, this target audience might not be open to learn about the use of RAPEX information. However, optimising the RAPEX website might help convincing reluctant non-users to work with it (again).

The following table provides a summary of the three target audiences and their expectations towards the RAPEX website.

Table 3: Expectations of target audiences.

Target audiences	Description	Expectations towards RAPEX
1. Regular users	<ul style="list-style-type: none"> - Have practical experiences in using the RAPEX website and the weekly email alert - Have concrete suggestions for improving the RAPEX website 	<ul style="list-style-type: none"> - Expect specific improvements of the RAPEX website in order to exploit its full potential
2. Unaware non-users	<ul style="list-style-type: none"> - Are in the majority micro and small businesses with limited resources - Are not concerned or informed about product safety in general - Expect their business partners, in particular manufacturers, to provide for compliance with product safety regulation 	<ul style="list-style-type: none"> - Do not have particular expectations towards the RAPEX website but show interest to learn about it. When introduced they consider the RAPEX website to be a useful tool.
3. Reluctant non-users	<ul style="list-style-type: none"> - Do not have a proper understanding of the RAPEX website - Prefer to rely on national authorities - Are dissatisfied with current features of the RAPEX website 	<ul style="list-style-type: none"> - Due to misperceptions might not be open to learn about the use of the RAPEX website - Demand concerted actions between national authorities and the European Commission rather than their own involvement in the RAPEX website - Expect specific modifications enhancing user-friendliness of the RAPEX website

Source: Civic Consulting.

SUGGESTED MESSAGES BY TARGET AUDIENCES

Distinct strategies to reach out to target audiences derive from the difference in knowledge and expectations towards the RAPEX website. Specific actions and key messages addressing the needs of each target audience are discussed. It has to be noted that while actions and messages are tailored to address a particular target audience, their impact is not limited to this audience. Where relevant, benefits for other target audiences are pointed out.

Targeting regular users

Even though regular users consider the RAPEX website useful as a one-stop system for unsafe products on the European market, economic operators belonging to this group stressed that it has not yet reached its full potential. To be a genuinely valuable tool for quality management and monitoring the market, further improvements to the RAPEX website are required and additional information has to be provided. Respondents emphasised that optimising the RAPEX website will increase their use of RAPEX information. A strategy addressing this target audience therefore should focus on the one hand on optimising the RAPEX website and on the other hand on continued monitoring of user satisfaction. The following table characterises this approach.

Table 4: Actions and key message for regular users.

Target audience	Actions	Channel	Stakeholders involved/ Collaboration with	Key message
Regular users	<ul style="list-style-type: none"> - Improving the RAPEX website based on feedback from users - Monitoring user satisfaction through pop-up surveys and a permanent online suggestion box 	- RAPEX website and email alert	- Users of the RAPEX website	- Your feedback is essential for improving the RAPEX website to its full potential as a tool for quality management and for systematically monitoring the market

Source: Civic Consulting.

As shown in the table above, in order to address the group of regular users it is recommended to improve the RAPEX website taking into account the recommendations provided by participants of this study (see Section 6.6). In addition to these suggestions, it would be beneficial to continuously monitor user satisfaction through pop-up micro-surveys or a permanent online suggestion box on the RAPEX website inviting users to submit suggestions for improvements. This would give regular users an opportunity to provide ideas for optimising the RAPEX website on a continuous basis.

The key message to regular users should be that their continuous feedback and input helps improving the RAPEX website according to their needs. It is a basis for exploiting the websites full potential as a tool of quality management and for systematically monitoring the market.

Optimising the RAPEX website, also benefits the two other target audiences as discussed in the following paragraphs.

Targeting unaware non-users

In contrast to economic operators that regularly interact with the RAPEX website the group of companies that are unaware of the existence of RAPEX have to be addressed in an entirely different way. As mentioned before, this group represents a considerable potential as future RAPEX users.

Given that unaware non-users are to a large extent micro-size and small companies that explicitly delegate the responsibility for product safety to manufacturers and importers, a two-step approach is recommended. First, awareness-raising measures focussing on the importance of product safety in general and respective legal requirements needs to alert unaware non-users of their duties. In a second step, specific information on the RAPEX website, its potential and how to use it can be provided. The following table gives an overview of this approach.

Table 5: Actions and key message for unaware non-users.

Target audience	Actions	Channel	Stakeholders involved/ Collaboration with	Key message
Unaware non-users	<ul style="list-style-type: none"> - Step 1: General awareness-raising campaigns on product safety and legal obligations - Step 2: Specific information on the RAPEX website, its potential and how to use it 	<ul style="list-style-type: none"> - Business journals - Trade fairs - Workshops 	<ul style="list-style-type: none"> - Business associations - Test labs - National authorities - Consumer organisations 	<ul style="list-style-type: none"> -Your responsibilities in product safety - The RAPEX website as a tool for quality management and for systematically monitoring the market

Source: Civic Consulting.

In order to reach out to unaware non-users and in particular to micro-size and small business, a number of different channels are proposed ranging from articles in business journals to raising awareness at trade fairs and in workshops. Awareness-raising campaigns both for product safety in general and RAPEX in particular would ideally be organized in collaboration with relevant stakeholders. Involving business associations, chambers of commerce, test laboratories and national authorities increases the likelihood to reach micro-size and small business.

Key messages for unaware non-users first need to focus on the responsibilities of individual companies in product safety and second on the potential of the RAPEX website as a tool for quality management and for systematically monitoring the market.

As indicated below, also reluctant non-users can be addressed through awareness raising measures.

Targeting reluctant non-users

Due to its heterogeneity and inherent scepticism, reluctant non-users may be the most difficult target audience to reach out to. Based on their varying reasons for neglecting the RAPEX website three types of reluctant non-users can be identified, which need to be addressed differently. The following table provides an overview of the approach, corresponding to the needs of each subgroup.

Table 6: Actions and key message for reluctant non-users.

Target audience	Actions	Channel	Stakeholders involved/ Collaboration with	Key message
Reluctant non-users with misperceptions	- Specific information on RAPEX, its potential and how to use it	- Business journals - Trade fairs - Seminars	- Business associations - Test labs - National authorities	- Your responsibilities in product safety
Reluctant non-users who were dissatisfied with the RAPEX website	- Improving the RAPEX website based on feedback from users	RAPEX website and email alert	- Users of RAPEX	- Your feedback is essential for improving the RAPEX website to its full potential as a tool for quality management and for systematically monitoring the market
Reluctant non-users who trust national authorities	- Specific information on RAPEX, its potential and how to use it	- Business journals - Professional networks, such as LinkedIn - Trade fairs - Seminars	- National authorities	- The RAPEX website as a tool for quality management and for systematically monitoring the market

Source: Civic Consulting.

To a certain extent the group of reluctant non-users with misperceptions might be resistant to learn about the RAPEX website. Nonetheless, providing specific information on the website's potential and how to use it may convince this group of companies of the practicality of RAPEX information for their business. For greater outreach a variety of communication channels should be used and different stakeholders need to be involved.

The needs of reluctant non-users who are dissatisfied with the RAPEX website are addressed through an improvement of the RAPEX website according to user feedback. Companies belonging to this group have to be reassured that their suggestions and feedback are taken into account. The key message should focus on the fact that the RAPEX website is improved based on user feedback with the aim to increase its potential for businesses as a tool of quality management and for systematically monitoring the market.

Finally, there should be a focus on increasing collaboration with national authorities, where relevant. Information distributed through these trusted stakeholders may convince companies, that the RAPEX website is a helpful tool for identifying unsafe products.

7.3. RECOMMENDATIONS FOR PROMOTING RAPEX

This sub-section presents recommendations for the promotion of the use of RAPEX information by economic operators deriving from the discussion of the targeted actions and key messages above.²⁷ Implementation of the recommendations by the European Commission depends on available resources and may be limited by stipulations of the legal framework.

SET OF RECOMMENDATIONS 1: IMPROVING THE RAPEX WEBSITE

The first set of recommendations relates to improvements to the RAPEX website. As discussed above, optimising the RAPEX website is of paramount importance for improving the use of RAPEX information by regular users. Enhanced usability of the website, furthermore, reduces the barriers for unaware and reluctant non-users, as it helps this group of companies to immediately grasp the purpose and value of the RAPEX website, when visiting it.

Respondents have been asked for changes or additional features that would increase the use of product safety information provided by RAPEX in their business. The answers provided indicate that a useful RAPEX website should be conceptualised as a *platform for businesses on product safety information* in general. Whilst the publication of RAPEX notifications is appreciated, interviewees proposed that the RAPEX website could offer further guidance on product safety, such as step-by-step guides on the legal obligations of economic operators or on procedures to follow in the event of the detection of an unsafe product. Hence, it is recommended to consider broadening the scope of the RAPEX website and to optimise the RAPEX website in a wider perspective not limited to mere changes of its current features.

While the development of a new concept of the website goes beyond the purposes of this study, the following suggestions may serve as a basis for the reorganisation of the RAPEX website.

Improving the design of the website

From an operational perspective, the RAPEX website seems to be well functioning. However, study participants tend to be overwhelmed by the complexity of the website. For instance, one company considered the RAPEX website a great learning tool and source of information about dangerous products but added that it is nonetheless too time-consuming to find the relevant information. Companies suggested reducing the information on the start page to three or four categories using more business oriented language and graphic clues. It is therefore recommended to revise the design of the RAPEX website taking into account best practices for user friendly website design.

Clustering notifications by sector

Equally important and along the same line of argument, it should be easily possible to group notifications by sector and product families. This would allow for a simplified search and companies would be in the position to quickly find the relevant information for

²⁷ Recommendations and communication strategies were developed on basis of the results of the field work conducted. A draft was discussed in three follow up interviews with companies focusing on the feasibility of implementation and the effectiveness of the suggestions. Draft recommendations and communication strategies were then revised based on the outcomes of the discussions, and are presented in this section.

their sector and business. As study participants outlined, the interest in RAPEX information highly correlates with its relevance to a business. If information cannot be filtered by sector, companies tend to lose interest. A first step for improved clustering of information could be to optimise the search function in this respect.

More targeted email alerts

Study participants emphasised the need for receiving more targeted email alerts. Such targeted email alerts are likely to require introducing user accounts for RAPEX. For example, a user could conduct specific searches (e.g. toys that pose a serious risk from China) and save this query. Weekly or monthly updates related to this query (depending on the preference of the company) could then be automatically sent to the user's email address. This would allow for the provision of targeted information to companies and considerably reduce search time for them. Similar systems are commonly in use, an example on the EU website is the tendering platform TED.²⁸

A further benefit of introducing RAPEX user accounts would be that additional information on product safety (e.g. regarding important legislative changes etc.) could be sent directly to all those recipients of email notifications that have agreed to receive relevant updates. This would not only be a very efficient communication channel, but at the same time safeguard that timely information reaches those in a company that are responsible for product safety and have the relevant language skills.

More information on the reason for notification, risk levels and risk assessment

A clear definition of the categories used on the RAPEX website, in particular of risk levels, would be important as it seems sometimes difficult to understand why a product defect qualifies as serious or minor risk. Study participants looking at the website for the first time during interviews asked how to interpret the term "serious risk" or where to find a definition. Regular users of RAPEX emphasised that despite their frequent interaction with the website they still did not understand on which grounds a risk is classified as serious risk. The provision of a definition of the different risk levels could solve this issue to some degree. Furthermore, these definitions could be used for clustering notifications on the RAPEX website according to risk levels. Users of the website could for example select the risk levels of the notifications displayed through drop down menus or a check box.

Equally important, according to respondents, would be comprehensive information on the reason for a notification and how the risk assessment has been conducted. Both in the survey and in the interviews, study participants mentioned that their motivation for consulting RAPEX notifications was to understand the types of hazards and risks currently affecting products in their sector. Some even mentioned that they would use RAPEX notifications as practical examples in internal trainings. However, in order to exploit the full potential of RAPEX information in this regard, a better understanding of the reason for notification, the risk assessment and its results is required. Study participants expressed their concerns about time consuming research for additional information and corresponding documents when trying to understand (if possible at all) the hazard or risk. Hence, publishing additional information on the reason for notification and risk assessment would save time and increase the understanding of relevant types of hazards and risks in a sector.

²⁸ TED (Tenders Electronic Daily) is the online version of the 'Supplement to the Official Journal of the EU, dedicated to European public procurement. See ted.europa.eu.

Identification of responsible manufacturer

According to several comments, the name of the responsible manufacturer or importer of notified products posing a serious health and safety risk for consumers ought to be published. Interviewees considered this as of particular importance for the management of their business relationships. If suppliers would repeatedly be notified on the RAPEX website, this would be a significant indicator for companies to question their trustworthiness, all the more if suppliers had not informed business partners about being listed on RAPEX. Assessing the legal implications of this recommendation goes beyond the realm of this study.

Higher resolution of photos

According to respondents, the description of a product is often not sufficient for identifying it on the market. Although in theory, the categories mentioned on the website seem adequate to describe the product, the information actually provided is often incomplete and underreported. Therefore, it would be important to ensure that at least a clear high-resolution picture of the product is made available.

In addition to these suggestions, a reorganisation of the RAPEX website also could include a set-up of regular micro-surveys popping up on the RAPEX website and a permanent online suggestion box with the view of monitoring user satisfaction and receiving user feedback (see also Section 7.2 above).

SET OF RECOMMENDATIONS 2: AWARENESS-RAISING AND STAKEHOLDER INVOLVEMENT

The second set of recommendation for the promotion of the use of RAPEX information relates to awareness raising and stakeholder involvement. Both survey and interview results revealed knowledge gaps and misperceptions on product safety and the RAPEX website, in particular among the group of unaware and reluctant non-users. To address these gaps and increase awareness on product safety especially among small and micro-size businesses, a variety of information activities can be useful. Study participants emphasised that a successful awareness raising strategy should draw on communication channels that are embedded in the professional environment of companies. Close collaboration with stakeholders such as business associations is therefore highly recommended.

As a first step, therefore, a dialogue with relevant stakeholder organisations could be initiated. European and national business associations as well as national authorities and chambers of commerce (where relevant) could be invited to participate in a *dialogue to discuss appropriate measures for improving awareness on product safety among small and micro-size businesses*. Such a dialogue would serve on the one hand to advocate the RAPEX website as a business tool amongst participating stakeholders and on the other hand to establish and enhance relationships with organisations that have the capacity for awareness raising among relevant companies, as well as discussing possible (joint) activities. The European Commission could support stakeholders in conducting awareness raising activities focusing on product safety in general and on RAPEX, both through its participation and possibly through providing financial support. A similar approach was taken by the European Commission in the framework of the European Toy Safety Campaign, where a specific toy safety information campaign targeting economic

operators involved in toy manufacturing and marketing was conducted, among other measures.²⁹

The following activities have been identified as possible tools for awareness raising based on the results of our field work:

Workshops

Workshops on product safety and the use of the RAPEX website provide a platform for interested companies to engage in and learn about the topic. While a workshop reaches only a limited number of companies, namely those willing to participate, it is a useful tool to actively involve businesses and to directly respond to their needs. As one respondent stated, workshops are a valuable opportunity in particular for professionals new to a business or sector to quickly engage with peers and to receive up-to-date information on product safety. Another respondent mentioned the success of workshops in the form of dialogue meetings between companies and local authorities which are conducted regularly in his country. According to this respondent the meetings are valuable also for receiving first-hand information on authorities' priorities on product safety. Stakeholders best placed for facilitating these workshops are business associations as they can draw on their members for participation. National authorities as well as the European Commission could contribute for example through presentations and the provision of educational materials.

Webinars

While workshops are a good platform for direct exchange, they only reach those companies that can afford the time and resources to participate. In order to reach companies who are willing to actively engage but have limited resources, webinars are a good alternative. They can educate companies about a variety of topics such as legal obligations of economic operators, technical product safety requirements and standards, the use of the RAPEX website etc. Economic operators can choose to watch webinars according to their own schedule and receive targeted and in-depth information on those topics they are interested in. Webinars can also be a tool for disseminating workshop results by providing records of a workshop online, e.g. through a universal platform such as YouTube or other streaming websites. The European Commission could directly commission the production of relevant webinars, or financially support the participation of suitable experts in relevant workshops under the condition that workshops are documented by video and uploaded to a relevant streaming website. Again, the support of business associations could be helpful in developing and providing a suitable webinar format, as well as in distributing the information concerning the webinar(s) to members.

Newsletters

In order to reach those companies that are rather inactive on product safety, newsletters can be an appropriate tool. Even though newsletters may not transmit the same depth of information as webinars and workshops, they have the advantage to reach a much larger number of companies including also those who would not actively engage in the topic. As respondents pointed out, almost all companies receive newsletters, especially from business associations but also from other sector relevant organisations such as chambers of commerce. However, these newsletters do not always cover the issue of product safety on a regular basis. Encouraging organisations disseminating business newsletters

²⁹ See e.g. http://europa.eu/rapid/press-release_MEMO-12-608_en.htm

to cover product safety more regularly is therefore a promising strategy to promote product safety and the RAPEX website. The distribution of information materials, ready-made articles or relevant press releases on product safety to respective organisations could be commissioned, or directly be undertaken by the European Commission.

Information at trade fairs

Another activity to reach out to a large number of businesses not actively involved in product safety is the provision of information at trade fairs. Usually large numbers of companies of a sector are present independent of their size and type of operation. While trade fairs are mainly attended by sales managers, in small companies often sales and quality managers are the same person, so that the relevant target audience can be reached. Examples for international trade fairs which may be a useful platform include *Cosmoprof* Bologna for cosmetics³⁰ or the *Spielwarenmesse* (toy fair) Nuremberg.³¹ Furthermore, sectoral and cross-sectoral trade fairs at the national level can be relevant. In particular the event or workshop programme that accompanies these trade fairs can provide a forum to organise for example a panel discussion or workshop on product safety and RAPEX. For this purpose, the European Commission could cooperate with business associations and other stakeholders already present at trade fairs or explore partnerships with the fair organisers.

Effective awareness raising on product safety and the promotion of the RAPEX website needs to rely on a *mix of communication tools*. The above discussed activities are therefore complementary in nature. Which activities are most suitable for the promotion of the RAPEX website depends on the identification of suitable partners for their implementation, and therefore on the outcome of the stakeholder dialogue suggested above.

ADVANTAGES AND DISADVANTAGES, COSTS AND TIME FRAME OF RECOMMENDATIONS

The following table assesses the advantages and disadvantages of the two sets of recommendations for promoting the RAPEX website, their potential costs and time frame.

³⁰ <http://www.cosmoprof.com/>

³¹ <http://www.spielwarenmesse.de>

Table 7: Overview of recommendations for promoting RAPEX.

Recommendations	Advantage	Disadvantage	Costs	Timeframe
1. Improving the RAPEX website	<ul style="list-style-type: none"> - Enhances user satisfaction - Can be implemented without major stakeholder involvement 	<ul style="list-style-type: none"> - Reliant on input from users 	<ul style="list-style-type: none"> - One-off costs: Investment in website design and content restructuring (minor to significant) - Recurring costs: Maintenance of website (minor) 	<ul style="list-style-type: none"> - Permanent task
2. Awareness-raising and stakeholder involvement	<ul style="list-style-type: none"> - Reaching-out to non-users and enlarging the group of users 	<ul style="list-style-type: none"> - Effect difficult to measure - Requires cooperation agreements with stakeholders 	<ul style="list-style-type: none"> - Depending on activities (significant to very significant) 	<ul style="list-style-type: none"> - Regular

Source: Civic Consulting.

8. ANNEXES

ANNEX I - DETAILED METHODOLOGY

This annex is an extract and adaptation of the detailed methodology submitted as an intermediate deliverable of this study.

INTRODUCTION

This document presents the detailed methodology for the study on the promotion of the use of RAPEX information by importers, distributors and retailers in the field of consumer product safety, with a particular focus on SMEs.

The study on “the promotion of the use of RAPEX information by importers, distributors and retailers in the field of consumer product safety, with a particular focus on SMEs” has the objective to provide an overview of the way how a target group of economic operators (importers, distributors, retailers) purchases goods, with a particular focus on if and how they use product safety information to monitor if their products sold or imported are safe.

The main focus of the study is to understand whether, how and to what extent importers, distributors and retailers of consumer products use the information available on the RAPEX website and how the use of such information can be improved. In particular, the study aims to set out recommendations on channels and tools helping to promote the use of RAPEX information, with a view to further enhancing product safety in the EU. Furthermore, the study aims to set out communication messages for boosting the uptake of RAPEX information by targeted economic operators throughout the EU, with the objective to promote the use of the information in business practice for checking that products notified as unsafe in RAPEX are not sold or purchased.

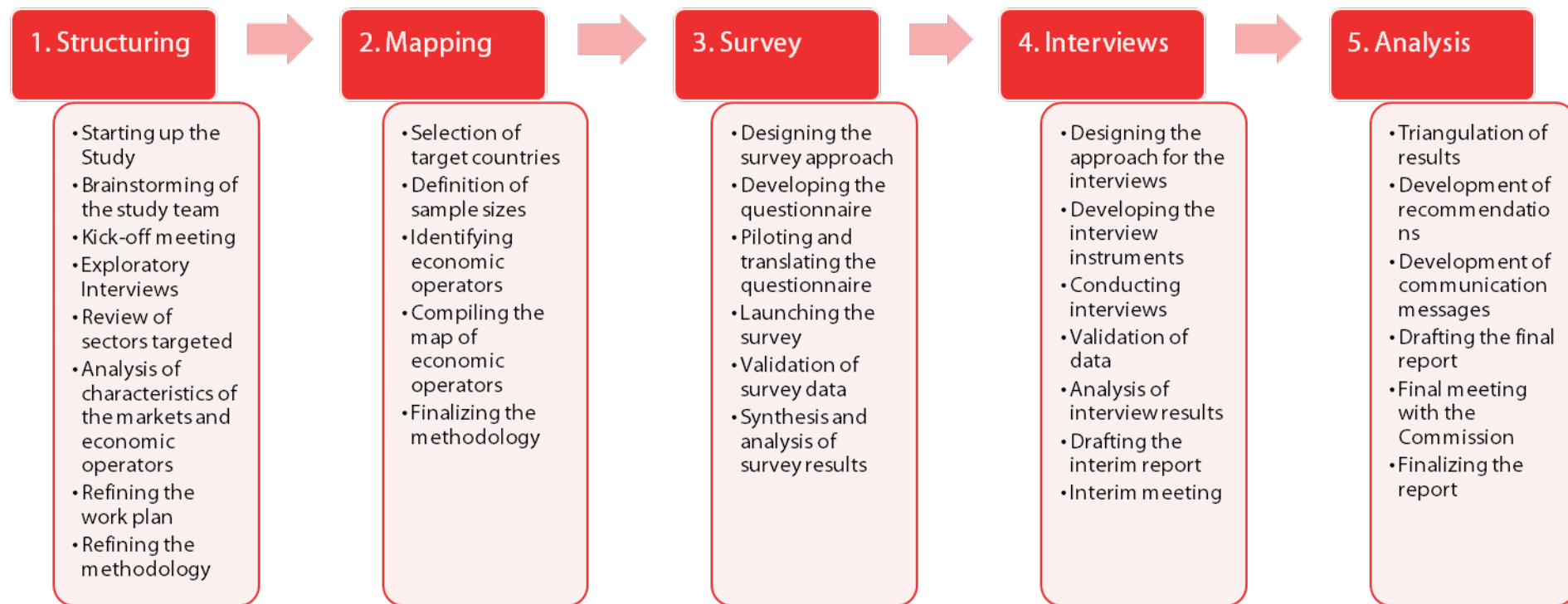
Research focuses on the current use of RAPEX information by targeted economic operators in the following five sectors: Toys, clothing/ fashion, cosmetics, electrical appliances/ housewares and childcare articles. It covers 14 EU Member States representing all geographic regions of the EU and more than two thirds of the EU population.

In order to fulfil the objective of the study, the research process is structured according to the following tasks:

- Task 1: Structuring
- Task 2: Mapping economic operators
- Task 3: Survey
- Task 4: Interviews
- Task 5: Analysis and recommendations

The figure on the following page presents an overview of the methodological approach for this study, and lists the methodological steps for each task.

Table 1. Methodological Approach



Source: Civic Consulting.

METHODOLOGICAL APPROACH

This section presents the overall methodological approach of the study and the research tools employed. The research is structured according to five major tasks: Structuring, mapping of economic operators, survey, interviews, and analysis and recommendations. Each task is characterized by steps that are to be undertaken in its fulfilment.

TASK 1: STRUCTURING

The first task of the research process is the structuring, which has the purpose to start up the study and to build up a broad understanding of the topic and context. A number of interrelated activities are undertaken in order to obtain a broad overview on the topic and to gather initial insights for the subsequent research process. The main methodological tools employed are a review of relevant documents and background information and the conduct of exploratory interviews.

STEP 1.1. STARTING UP THE STUDY

To start up the study, a number of interrelated activities to organize the research process and to obtain initial insights for the subsequent research process are conducted.

Document management and related procedures

An important initial step is setting up document management and related procedures for the large number of documents reviewed for the study, including statistics and market research regarding the selected market sectors, policy documents and legislation pertaining to product safety, stakeholder documents and examples of communication brochures and booklets targeted at economic operators to inform them of RAPEX and their responsibilities under the EU legislative framework for product safety. This documentary evidence is collected and catalogued throughout the research process using dedicated software, *Mendeley*, which is well suited for cataloguing, annotating, citing, and linking documents, inter alia. An appropriate tagging system to start up the document review and to be used over the course of the study is developed.

Review of documents and background information

While the collection and review of documents proceeds throughout the study, at this first stage of the research process attention is focused on reviewing selected key documents, in order to build up a thorough contextual understanding.

STEP 1.2. BRAINSTORMING OF THE STUDY TEAM

The structuring phase to start up the study includes an internal brainstorming within the study team, to reach a common understanding of the matter at hand and to compile a full list of relevant issues that need clarification.

STEP 1.3. KICK-OFF MEETING

The kick-off meeting is an important step during structuring in order to discuss the methodological approach proposed for this study and to reach an agreement and common understanding on all important points.

STEP 1.4. EXPLORATORY INTERVIEWS

Exploratory interviews are conducted (mainly by phone) with key stakeholders and experts at EU and Member States level, with a view to fill information gaps of the review of key documents (Step 1.1.) and to obtain initial insights on the perspectives of stakeholders of the study. Insights from exploratory interviews are particularly relevant for the implementation of the methodological tools in the subsequent research process including the survey and in-depth interviews. In the following a list of stakeholders which are relevant to the study and suitable to conduct exploratory interviews with is provided:

- Toy Industries Europe
- European Nursery Product Confederation
- HASBRO
- Fédération du Commerce et de la Distribution (France)
- European Apparel and Textile Confederation
- MODINT - Trade organisation (The Netherlands)
- European Committee of Domestic Equipment Manufacturers
- Cosmetic Toiletry & Perfumery Association (United Kingdom)
- Cosmetics Europe

Guiding questions which are used to conduct these exploratory interviews are presented in the following text box.

Guiding questions for exploratory interviews

A. INTRODUCTION

0. Please, shortly introduce yourself and your organisation/ company.

B. DESCRIPTION OF THE SECTOR

1. Please, shortly describe the sector you are operating in (e.g. in terms of retail size, imports, type of companies operating in the sector).

2. How is the supply chain in the sector organized? Are there different types of supply chains?

3. What is your role in the supply chain? (e.g. manufacturer, importer, distributor, retailer)

C. PURCHASING PRODUCTS

4. Which channels or platforms do you use to purchase your products? (e.g. catalogues, websites) Do you use particular search engines?

5. What are your sources to get information on the quality, compliance and reliability of the products you purchase?

6. In what language do you operate and purchase products?

D. PRODUCT SAFETY AND THE USE OF RAPEX

7. How do you ensure product safety and safety compliance in your product range? In particular, what types of information do you consult?

8. Do you know RAPEX? What do you know in particular?

9. Do you use the RAPEX website? What do you use the RAPEX website for?

10. Do you know or consult other platforms/registers similar to RAPEX?

11. Do you have any suggestions regarding RAPEX to make it useful for companies?

- Suggestions to the information displayed
- Suggestions to the website design
- Suggestions for communication messages to promote RAPEX
- Suggestions for communication channels
- Other suggestions

E. SUGGESTIONS REGARDING THE STUDY

12. Do you have suggestions how and where we can best reach out to companies regarding their participation in a survey for the study?

13. Do you have suggestions for other stakeholders, we should include in the study?

STEP 1.5. REVIEW OF SECTORS TARGETED

The study targets the following five sectors: Toys, clothing, cosmetics, electrical appliances, and childcare articles, which have been identified as most relevant in terms of RAPEX notifications. A short review of these target sectors is undertaken, which aims at briefly characterizing the sectors in order to build up a contextual basis for the subsequent research process. It is based on the information gathered during the initial review of documents (Step 1.1.) and the exploratory interviews (Step 1.4.).

STEP 1.6. ANALYSIS OF CHARACTERISTICS OF THE MARKETS AND ECONOMIC OPERATORS

Based on data collected in the literature review and the exploratory interviews, an analysis of characteristics of the markets in the selected target sectors of this study is undertaken. In particular the respective roles of importers, distributors and retailers, which are defined as the specific target categories of economic operators for the study come under scrutiny. A definition of these economic operators is provided in the following box.

Definition of the terms importer, distributor and retailer

Three types of economic operators are targeted in this study: importers, distributors, and retailers. For the purposes of the research, they are characterized as follows:

- An importer is understood as any natural or legal person established within the EU who imports consumer products from manufacturers or distributors not established in the EU.
- A distributor is any person or legal entity that makes large quantities of consumer products available to other businesses for resale. Products can be both distributed on behalf of a manufacturer or purchased as a wholesale from another distributor. Therefore, distribution and wholesale have been grouped into one category for this study, namely distribution/wholesale.
- A retailer refers to any person or legal entity that purchases consumer products in large quantities and sells it directly to the consumers, i.e. the retailer is the final point of sale.

In addition to the categorisation of economic operators, the analysis focuses on the characteristics of the market in the five target sectors. In particular, the types of supply chains existing in each target sector are assessed. Broad characterizations of different types of supply chains are presented in the following table.

Definition of different types of supply chains as suggested in the CPEC offer

Manufacturer-driven supply chains: In these supply chains manufacturers (often large multinationals), while not necessarily manufacturing their brand products themselves, typically exert a large amount of control over the development and production process as well as the manufacturing in third countries (e.g. in China), and the import and distribution in the EU. Procedures undertaken by manufacturers for product safety along the supply chain include risk assessments in the development phase, regularly auditing suppliers in the manufacturing phase, and establishing recall policies and consumer feedback systems in the distribution phase.

Retailer-driven supply chains: In these supply chains, retailers commission the production of specific products in third countries such as China (but typically at smaller sized plants) and therefore only have control from the manufacturing phase onwards, where they can undertake supplier audits and product testing. Furthermore, as retailers are directly involved in product sale to final consumers, they can also operate a consumer feedback system to increase product safety.

Trader-driven supply chains: In these supply chains traders or importers (located in the EU) buy products off the shelf from the manufacturer or a distributor in the production country outside the EU. The importer has hardly any control over the supply chain and therefore product safety. Since this type of economic operator is only involved in the import and distribution of products, its activities regarding product safety are often limited to the inquiry about test results and safety compliance reports from suppliers (in spite of the fact that they may be the main responsible entities for corrective action in case a product they have imported is found to be dangerous).

Overall, the purpose of this methodological step is to refine the understanding of the target sectors and the role of different economic operators in the respective supply chains. Specifically, the analysis is aimed at understanding the following issues in each sector:

- Market size and relevance of imports for the sector;
- Structure of the supply chain, with the aim to determine which types of supply chains (manufacturer-, retailer-, or trader-driven) are dominant in a given sector (or their respective proportions in case all three types are relevant);
- Types and sizes of economic operators in the sector (and the proportions to which importers, distributors and retailers are relevant).

STEP 1.7. REFINING THE WORK PLAN

During the structuring phase, it is crucial to implement the work plan, which sets out each step of the research process, into a dedicated project management software for the effective management of the study. Each step and related sub-steps are included to define how specific sub-steps are linked and which activities contribute to the 'critical path' of the study (i.e. which activities are time-dependent and define the overall length of the work).

STEP 1.8. REFINING THE METHODOLOGY

As a final step to the structuring phase, the methodological approach to the study is refined based on suggestions from the kick-off meeting, internal brainstorming, and preliminary results from the document review and the exploratory interviews. The refined methodology specifies the approach to:

- The analysis of the research results;
- The elaboration of the recommendations;
- The recommendations' indicative feasibility check; and
- The consolidation and validation of recommendations.

Furthermore it presents in more detail:

- Selection criteria for the map of economic operators (see below Task 2);
- A grid of questions for the interviews (see Step 4.2);
- A list of companies targeted in the map (see below Step 2.4);
- An approach to conducting the interviews and implementing the survey (see below Tasks 3 and 4)

TASK 2: MAPPING ECONOMIC OPERATORS

The mapping exercise is a key element of the methodological approach. It provides a basis for the subsequent research process, particularly for the survey. Economic operators included in the map will be invited to participate in the survey and will furthermore be considered for the in-depth interviews.

The following table presents the criteria which are applied in the mapping exercise. These criteria ensure that economic operators included in the map are appropriate with regards to the fulfilment of the objective of the study.

Table 2. Criteria for creation of the map of economic operators

Overall criteria	Specification of the criteria
Balanced representation of economic operators regarding size	A minimum of 200 economic operators including: - A minimum of 5 large multinational companies - A minimum of 70% [i.e. 140] of the companies included are SMEs
Balanced representation of economic operators regarding type	A minimum of 5 sectoral business organizations at national and EU level included Representative distribution of types of economic operators among importers, distributors and retailers reflecting the characteristics of the market
Sector relevance	Economic operators have to operate in at least the following five key RAPEX sectors of consumer products: toys, clothing, cosmetics, electrical appliances, and childcare articles
Geographical balance	Operators based in at least half of the EU Member States [i.e. 14] Representation of all geographical regions in the EU In sum selected Member States cover at least 2/3 of the EU population

Source: Civic Consulting.

The following approach to the mapping of economic operators will be implemented:

- Step 2.1: Selection of target countries;
- Step 2.2: Definition of sample size by country and sector;
- Step 2.3: Identification of economic operators;
- Step 2.4: Compiling the map of economic operators;
- Step 2.5: Finalizing the methodology.

Following these steps we will ensure that the map of economic operators compiled at the end of this process will fulfil the above defined selection criteria.

STEP 2.1. SELECTION OF TARGET COUNTRIES

For the selection of Member States, covered by the study, the following criteria are applied:

- Coverage of at least half of the EU Member States;
- Coverage of at least two thirds of the European population;
- Coverage of the various geographical areas of Europe;
- Countries with different population and market sizes;
- Differences in the number of notifications of RAPEX per capita.

On the basis of these criteria a list of 14 Member States is compiled. The final list of target countries covered by the study is presented in the following table. As required, the sample covers more than two thirds of the EU population (88%), and constitutes a balanced mix of:

- Large, medium and small markets;

- Countries from northern, westerns, eastern and southern Europe; and
- Countries with high, medium or low number of RAPEX notifications per capita.

Table 3. Selected target countries.

Country	Market size ^a	Population size ^b	Geographical area ^c	RAPEX notifications per capita ^d
Belgium	Medium	Medium	Western	Medium
Czech Republic	Small/Medium	Medium	Eastern	Medium
Denmark	Medium	Small	Northern	High
France	Large	Large	Western	Low
Germany	Large	Large	Western	Medium
Italy	Large	Large	Southern	Low
The Netherlands	Large	Medium	Western	Medium
Poland	Medium	Large	Eastern	Low
Greece	Medium	Medium	Southern	Medium
Romania	Small/Medium	Medium	Eastern	Low
Slovenia	Small	Small	Southern	High
Spain	Large	Large	Southern	Medium
Sweden	Medium	Small	Northern	Medium
United Kingdom	Large	Large	Northern	Low
<i>Total (as share of EU)</i>	<i>87%</i>	<i>88%</i>	<i>All regions represented</i>	<i>All categories represented</i>

Source: Civic Consulting, based Eurostat and others. ^aSource: Eurostat; countries with a GDP < 150,000 million are considered small, countries with a GDP < 500,000 million are considered medium. Romania and Czech Republic are categories as Small/medium, because they are close to the higher category. ^bSource: Eurostat; countries with a population size < 10,000,000 are considered small, countries with a population size < 30,000,000 are considered medium. ^cClassification of countries is according to the United Nations Statistics Division. ^dSum of notifications and reactions (follow-up) divided by population size; < 0.4 notification per 100,000 people is considered low, between 0.4 and 2.5 notifications per 100,000 people is considered medium, above 2.5 notifications per 100,000 is considered high.

STEP 2.2. DEFINITION OF SAMPLE SIZES

Subsequent to the final selection of target sectors and target countries, the overall sample size and the sample sizes per country and sector for the map is defined based on the following approach: A sample size per country is defined. These samples are then split between the sectors according to their relevance (see below).

Overall sample size of operators for mapping exercise

Taking into consideration that economic operators in the map are targeted as participants in the survey and that response rates for online surveys of economic operators in general and for small and medium sized companies in particular tend to be low, the overall sample size of operators is set to approximately 1000 operators for the map. The operators are identified through different channels (see below), and contact details and criteria for selection are provided based on a review of the operators' websites.

Sample sizes per country

Sample sizes per country are determined on basis of the market size of the country (which is related to the number of operators in this country). Countries with big markets and large populations/number of operators are covered with a larger sample size, while countries with a small market and small populations/number of operators are covered with a smaller sample size. Taking into consideration the final selection of countries, the sample sizes in target countries is set as follows:

Table 4. Sample sizes of operators in target countries

Country	Number of operators
France	100
Germany	100
Italy	100
United Kingdom	100
Spain	100
Poland	70
The Netherlands	70
Belgium	70
Czech Republic	50
Denmark	50
Greece	50
Romania	50
Slovenia	50
Sweden	50
Total	1010
France	100
Germany	100
Italy	100
United Kingdom	100
<i>Total</i>	<i>1010</i>

Source: Civic Consulting.

As the table displays, in total the sample comprises 1010 operators across the 14 countries, consisting of operators that import, distribute and sell products in the five target sectors.

Sample sizes per sector

Taking into consideration the market size of each sector as well as the share of RAPEX notifications the overall sample of economic operators in the map is split according to the following shares between the five sectors:

Table 5. Share of economic operators from different sectors in overall sample

	Toys	Clothing/ fashion	Cosmetics	Electrical Appliances	Childcare Articles
Share	30%	30%	15%	15%	10%

Source: Civic Consulting.

The comparably large sample sizes for operators in the clothing and the toy sector are based upon the exceptionally high percentages of RAPEX notifications for these two sectors. The smaller sample sizes for operators in the sectors of cosmetics, electrical appliances and childcare articles are based on the lower number of notifications and other considerations, such as market size.

Using these proposed shares, the country samples for the map of operators are displayed in the following table.

Table 5. Share of economic operators from different sectors in overall sample

Country	Toys	Clothing/ fashion	Cosmetics	Electrical Appliances	Childcare Articles	Total
France	30	30	15	15	10	100
Germany	30	30	15	15	10	100
Italy	30	30	15	15	10	100
United Kingdom	30	30	15	15	10	100
Spain	30	30	15	15	10	100
Poland	21	21	10	10	8	70
The Netherlands	21	21	10	10	8	70
Belgium	21	21	10	10	8	70
Czech Republic	15	15	7	7	6	50
Denmark	15	15	7	7	6	50
Greece	15	15	7	7	6	50
Romania	15	15	7	7	6	50
Slovenia	15	15	7	7	6	50
Sweden	15	15	7	7	6	50
<i>Total</i>	<i>303</i>	<i>303</i>	<i>147</i>	<i>147</i>	<i>110</i>	<i>1010</i>

Source: Civic Consulting.

STEP 2.3. IDENTIFYING ECONOMIC OPERATORS

For the identification of companies to be included in the map, a two-step research approach is employed for all countries covered, consisting of:

1. Identification of economic operators that are members of national business associations in the relevant sectors;
2. Complementary identification of economic operators through structured internet research.

1. Identification of economic operators that are members of business associations

In a first step, the names of member companies of business associations in targeted countries/sectors from the associations' websites is retrieved, or, where they are not published on the website, business association are approached to request this information. In this process, the associations are provided with details on the aims of the study and are also invited to forward this information to their members. It is expected that business associations are cooperative, as a better use of RAPEX by businesses could be beneficial for the sector, increase consumer confidence and reduce the number of instances in which corrective actions including recalls are necessary. In this process, the interest of business associations to participate in the process through in-depth interviews is also established. Respective business associations are included in the map.

Identification of economic operators through structured internet research

In a second, complementary step economic operators which are not members of an association (e.g. because they are very small in size) are identified. As mentioned above, small sized operators are of great relevance for the study. Therefore, a structured internet research approach is employed in order to identify additional economic operators. The following approach is taken:

- First a variety of web indices and directories are used, including national registers of importers and other relevant registers (where available), as well as national yellow pages and DMOZ to identify target companies;
- Then relevant search engines such as Google are used to directly identify company websites. For this approach, for each target country, combinations of the search terms "importer"/"import", or "distributor"/"warehouse"/ "wholesale" or "retailer"/"sale"/"shop" are applied to each of the five target sectors (e.g. "toys"), translated to the national language. The search is limited to the websites of respective countries by using relevant search functions. For example, to identify websites of toy importers in the United Kingdom the search query "toys import site:.uk" is entered in the Google search engine;
- Finally, the search is complemented by searching popular intermediaries such as Amazon market place and eBay, where a large number of entries from small and medium-size companies is expected to be found.

Through this approach a broad database of economic operators for inclusion in the map is established.

STEP 2.4. COMPILING THE MAP OF ECONOMIC OPERATORS

The websites of all economic operators identified is visited in order to collect and complete the following information on the operator for the compilation of the map:

- Name and contact details;
- Target sector(s) the company operates in;

- Type of economic operator (importer, distributor, retailer);
- Size of operators (SME or a large multinational company).

When compiling the final map, all criteria listed in the previous steps are adhered to. Hence, the map includes:

- A minimum of 1000 economic operators, of which a minimum of 70% are SMEs;
- Representative distribution of types of economic operators among importers, distributors and retailers reflecting the characteristics of the market;
- Economic operators operate in at least one of the following five key RAPEX sectors of consumer products: toys, clothing, cosmetics, electrical appliances, and childcare articles;
- Operators are based in 14 of the EU Member States which represent all geographical regions in the EU and 88% of the EU population.

Furthermore, it is ensured that the map of economic operators includes the suggested number of large multinational companies and business associations. The map has the format displayed on the following page. The final map is delivered as an excel file.

Table 5. Share of economic operators from different sectors in overall sample

Country	Company	Address	Phone	Email	Sector					Type of operator			Size		Comments
					Toys	Clothing	Cosmetics	Electrical	Childcare	Importer	Wholesale/ Distributor	Retail	Large Multinational	SME	
Belgium	Company 1	YX Street	0032-...	info@company.be	X			X		X				X	
	Company 2											
	...														
<i>Country total</i>															
Poland	Company 1														
	Company 2														
	...														
<i>Country total</i>															
Business associations (EU and national)	Assoc 1														
	Assoc 1														
	...														
<i>Total</i>															

Source:

Civic

Consulting.

TASK 3: SURVEY

The objective of the survey is to gather evidence from economic operators. The survey results will provide indications on purchasing channels and procedures for safeguarding product safety, in particular the use of the RAPEX website and the usefulness of the information displayed. The following steps are undertaken:

- Step 3.1: Designing the survey approach;
- Step 3.2: Developing the questionnaire;
- Step 3.3: Piloting the questionnaire;
- Step 3.4: Launching the survey;
- Step 3.4: Validation of survey data;
- Step 3.5: Synthesis and analysis of survey results.

STEP 3.1. DESIGNING THE SURVEY APPROACH

An online survey with the following features will be conducted:

- *Target participants:* Target participants are economic operators in the toy, clothing, cosmetics, electrical appliance and childcare article sectors, which operate as importers, distributors and/or retailers of consumer products in at least one of the target countries;
- *Sampling:* Sampling is based on the structured mapping approach outlined above in Task 2, illustrating the representativeness of the targeted 1000 economic operators according to market characteristics;
- *Geographical coverage:* The survey is conducted in all 14 EU Member States selected, which cover more than 88% of the EU population and all geographic areas of Europe (see Task 2 for more details).

The online survey is implemented on the platform *Qualtrics*.

STEP 3.2. DEVELOPING THE QUESTIONNAIRE

The questions for the survey are developed on the basis of the review of background information, the preliminary findings of the exploratory interviews, and the analysis of the target sectors. The questionnaire is targeted at collecting evidence in light of the objective of the study. The survey questionnaire, indicating also the format of the questions is provided in the text box below. To encourage a high participation rate, the questionnaire is designed as simple as possible and limited to 12 questions. Additional study questions, especially those requesting more time from the participants to answer, are discussed with economic operators during the in-depth interviews.

STEP 3.3. PILOTING AND TRANSLATING THE QUESTIONNAIRE

The survey questionnaire is implemented in *Qualtrics* and tested on a small sample of economic operators (in English language). The pilot survey aims to check for factual consistency, verify general comprehension of the questions and answer options for closed questions. Piloting of the questionnaire is an essential step to avoid inconsistent or questionable results due to ambiguous or incomplete wording of questions.

After the piloting phase has been completed, the survey questions are refined where needed. The finally accepted English master version of the questionnaire³² will be translated into the main languages spoken in all countries of the sample, namely:

- French
- Dutch
- Czech
- Danish
- German
- Greek
- Italian
- Polish
- Romanian
- Slovenian
- Spanish
- Swedish

The translation of the questionnaire is considered essential to safeguard a sufficient number of high quality answers, and enables the participation of economic operators that are not fluent in English.

STEP 3.4. LAUNCHING THE SURVEY

The survey is launched through the online platform *Qualtrics* referred to above. All economic operators included in the map are invited to participate in the survey. For this purpose the following process is implemented:

1. All target operators are invited individually by email, including the link to the survey and a letter of support from the European Commission;
2. Response rates are monitored and, wherever necessary, operators that have not responded to the invitation in countries/sectors with low response rates are contacted through follow-up phone calls by a team of researchers with native language capacities in all the countries covered by the study. The phone calls will help to directly inform the responsible person for imports/purchases in the targeted companies about the project and the importance of responding to the

³² Please note that any changes to the questionnaire after final approval of the master questionnaire will not be possible once the translation process has started.

survey, which will help to provide a better service to them (through an improved RAPEX) in the future.

Through this approach the minimum of 90 questionnaire responses from the contacted economic operators is expected to be reached.

STEP 3.5. VALIDATION OF SURVEY DATA

In this step, the accuracy and consistency of the data collected is verified. Data is checked for completeness and if necessary a protocol to handle missing values is established, depending on the severity of the issue. Usually, a well prepared survey questionnaire, which has been refined after a piloting phase, largely prevents incomplete survey data due to missing values. However, if incomplete responses or responses that are contradictory or seem to be significantly distorted or untruthful (e.g. by referring to non-existing portals or trade channels) are identified, they will be excluded from the sample and replaced through a response from a similar type of operator.

STEP 3.6. SYNTHESIS AND ANALYSIS OF SURVEY RESULTS

Survey results will be synthesised and analysed with respect to the objectives of the study. Detailed result tables are provided and key outcomes per question described. Results are compared across sectors, countries, and types of economic operators. The synthesised and analysed results inform the subsequent research process and help to identify key areas which need to be further explored in the following phase of in-depth interviews.

TASK 4: IN-DEPTH INTERVIEWS

The objective of the in-depth interviews is to confirm the results from the survey and to complement them wherever information gaps are detected, factual inconsistencies are identified or survey results indicate that an in-depth interview could reveal further relevant information. In-depth interviews will focus on providing operators' perspectives on the use of the RAPEX website, the usefulness of the information displayed and suggestions regarding the promotion of RAPEX. The following steps are undertaken:

- Step 4.1: Designing the approach for in-depth interviews;
- Step 4.2: Developing the interview instruments;
- Step 4.3: Conducting interviews;
- Step 4.4: Validation of data;
- Step 4.5: Synthesis and analysis of results.

STEP 4.1. DESIGNING THE APPROACH FOR THE INTERVIEWS

The design of the approach for the interviews is based on the outcomes of the mapping exercise and the survey with the purpose to fill gaps in the evidence base and to complement results with more detailed information. A minimum of 30 semi-structured interviews are conducted. Since participants have the opportunity to provide answers in detail, semi-structured interviews will provide an opportunity to gather in-depth evidence, especially regarding the improvement of RAPEX and its promotion. Target interviewees are selected according to the same criteria that are used for creating the

map: Interviewees are economic operators (importers, distributors or retailers) in the five target sectors across the countries covered by the research comprising:

- At least 21 interviewees (70%) from a small or medium size company;
- At least 3 business associations;
- At least 2 large multinational enterprises.

The precise composition of the sample is agreed with the Commission. Potential interviewees are identified during the mapping exercise, also taking into account recommendations of Member States business associations. Furthermore, participants of the online survey are included, if their response suggests that an interview could reveal important information.

STEP 4.2. DEVELOPING THE INTERVIEW PROTOCOL AND GUIDELINE

In this step, an interview protocol to guide the administration and implementation of the interviews and an interview guideline with a list of open-ended questions to explore the topic is developed. The interview protocol is a tool to standardize interviews and increase comparability of results. It is used by interviewers as a guide for preparing and conducting the interview and covers the following aspects:

- The purpose of the interview;
- Terms of confidentiality;
- The format of the interview;
- A reminder to allow the interviewee to clarify questions and doubts.

Interviews are targeted at collecting complementary evidence for the research and have the purpose of providing more detailed answers and background information than is possible to collect through the survey. Special emphasis is given to questions requiring explanations and detailed reasoning, especially those concerning potential recommendations and communication messages. The interview guideline is therefore clustered around the same topics as the survey but features more open-ended questions to encourage the interviewees to elaborate on their thoughts. Interview guidelines are adapted according to the operator type and the interviewee's background.

STEP 4.3. CONDUCTING INTERVIEWS

Experienced researchers, who are native speakers in all official EU languages, conduct the interview in the native language of the interviewee, wherever this is preferred by the interviewee. Interviewers are trained before conducting the interview in order to ensure a good level of background knowledge on the topic and understanding of their role and potential to influence results. The aim is to decrease interviewer bias and increase consistency of results across interviews. All interviews are recorded to allow for a detailed analysis of the results.

STEP 4.4 VALIDATION OF DATA

In order to validate the evidence gathered in the interviews, a summary note of each interview is prepared in English. Factual information that has been provided by interviewees is verified via desk research and where necessary by follow-up emails or phone calls.

STEP 4.5 ANALYSIS OF INTERVIEW RESULTS

Interview results are analysed with respect to the objectives of the study as presented in the introduction, based on the summary notes prepared for each interview. In a summary interview report, key outcomes by thematic clusters of the interview are described and results across sectors, countries, and types of economic operators differentiated, where relevant. The synthesised and analysed results are used for triangulation with data obtained from the online survey.

STEP 4.6. DRAFTING THE INTERIM REPORT

An interim report is submitted to the Commission presenting the interim results of the survey and the in-depth interviews. It outlines proposed solutions to possible difficulties encountered and the remaining steps to be completed before the end of the study. The box below presents an indicative structure of the report.

Indicative structure of the interim report

1. Introduction and progress update

- Work conducted thus far, including mapping of economic operators, survey and in-depth interviews

2. Interim results of survey

- List of participants that responded to surveys (interim status)
- Presentation of interim results according to issues

3. Interim results of interviews

- List of interviewees (interim status)
- Presentation of interim results according to thematic clusters of the interview guideline

4. Next steps

5. Annexes

STEP 4.7. INTERIM MEETING

The interim meeting with the Commission serves to discuss the contents of the interim report.

TASK 5: ANALYSIS AND RECOMMENDATIONS

The objective of this final phase of the research process is to analyse and synthesise the information collected in preparation for the delivery of the final report. The key aims are to triangulate data across different data sets and to develop recommendations and communication messages for the promotion of RAPEX in fulfilment of the objective of the study.

STEP 5.1. TRIANGULATION AND ANALYSIS OF RESULTS

Before using the data obtained in the survey and in-depth interviews for answering the key questions of the study, an important step is to triangulate the results. The purpose of the triangulation is to establish, that both methodological tools employed for data

collection (survey and interviews) provide similar results that can be synthesized for the analysis.

The data sets obtained from each methodological tool are validated immediately after they have been collected (Step 3.5. and 4.4.), such that at this stage validated evidence from these two main data collection tools is already established. In order to validate results across data sets, results are compared for each key thematic cluster including: purchasing strategies, current knowledge on RAPEX, current use of RAPEX information, suggestions and recommendations that would increase such use, suggestions for the promotion of RAPEX. The comparison will differentiate between types of economic operators, sectors and countries. It is expected that on many issues, the data from the surveys and the in-depth interviews reach very similar conclusions. However, in other aspects, views and data are likely to be divergent or inconsistent and thus require further evidence to substantiate conclusions made. After having identified any inconsistencies, we will follow up with the relevant stakeholders and employ further desk research. Subsequent to the triangulation a validated and consistent dataset across methodological tools is obtained, which provides synthesized results regarding the key thematic clusters.

Synthesised results from the triangulation are then used to derive conclusions on the key issues of the study including: the current purchasing strategies and platforms of economic operators, the knowledge about RAPEX, the current use of RAPEX information in business practice, reasons for not using RAPEX, changes which would increase the use of RAPEX, platforms and channels through which RAPEX could be promoted. Here, the initial analysis of markets and economic operators undertaken in the structuring phase (Step 1.6.) will be taken into due consideration. Results of key issues are presented according to types of economic operators and their role in the supply chain, differences between sectors and countries. Based on this analysis, recommendations and communication messages are subsequently developed.

STEP 5.2. DEVELOPMENT OF RECOMMENDATIONS

Recommendations for the promotion of RAPEX are developed based on the validated and triangulated results. These recommendations take into account the legal framework on product safety in the EU and provide specific and practical suggestions and activities regarding:

- Improvements and changes on the RAPEX website in an economic operator's perspective;
- Other IT tools which may be useful to promote RAPEX (e.g. Apps);
- Additional and innovative communication channels through which a larger number of economic operators can be reached.

All recommendations build on the results of the surveys and interviews, as well as possible additional suggestions by the team of experts. A feasibility check for all recommendations is conducted and provides indications regarding the following aspects:

Table 7: Overview of recommendations for promoting RAPEX.

Recommendations	Advantages	Disadvantages	Cost effectiveness	Potential pay-off	Timeframe
Recommendation 1:
Recommendation 2:
...					

Source: Civic Consulting.

Draft recommendations are consolidated in an internal brainstorming with expert involvement and validated through communication with selected business representatives and operators identified in the course of the study.

For this purpose a part of the in-depth interviews (e.g. 5-10) are conducted after draft recommendations have been developed. These interviews focus on a detailed discussion, to provide additional feedback and validation by the targeted community of operators.

Subsequently, the research process will proceed with developing concrete communication messages targeted at promoting the use of RAPEX amongst economic operators.

STEP 5.3. DEVELOPMENT OF COMMUNICATION MESSAGES

This step serves to develop communication messages for the promotion of RAPEX amongst relevant economic operators. It can be expected that depending on the size of an economic operator and its functions in the supply chain, different levels of knowledge regarding RAPEX and different expectation towards RAPEX information exist, leading to different communication needs. Taking these differences into account, communication messages are developed as follows:

- *Identifying and characterizing the target audience(s):* As set out in the objective of the study, the target audience is mainly small and medium sized companies operating as importers, distributors and retailers in RAPEX relevant sectors. Based on the analysis of the results of survey and interviews, relevant groups of economic operators are characterized, evaluating the feasibility of communicating to economic operators as a group or clustering economic operators according to their level of knowledge and their expectations and needs towards RAPEX into separate target audiences;
- *Matching the needs of the target audience with RAPEX features:* Based on the analysis of the results of survey and interviews, a list of needs and concerns of each target audience regarding RAPEX is drafted. Needs and concerns are matched individually with the main features of RAPEX and thereby derive a limited number of main points that need to be communicated (and, where necessary, improved upon);

- *Translating main points into key messages:* In a final step, these main points are translated into relevant and comprehensible key messages. Key messages are developed separately for the target audiences identified.

STEP 5.4. DRAFTING THE FINAL REPORT

The final report will describe the research process and results of the study. It will contain a summary of the main results obtained. All conclusions are based on evidence generated throughout the study using the main methodological tools (mapping economic operators, surveys and interviews), as well as the complementary evidence collected. Evidence is checked and validated in the steps above in order to yield clear, consistent and coherent results. Any remaining gaps or limitations identified are rendered explicit, with a discussion of the possible impact of those limitations. On the basis of the information gathered recommendations for improvements to the RAPEX website and strategies for the Commission to promote RAPEX are presented. In this regard, communication channels and platforms as well as communication messages are suggested.

An indicative outline of the final report is provided in the box below.

Indicative outline of the final report

Summary of the key messages

Executive summary (in English and in French)

- Synthesis of methodology followed
- Key results of mapping exercise, survey and in-depth interviews
- Key conclusions/recommendations

Main report

- Introduction
- Methodology of the study
- Background of the study
- Results of the survey-
- Results of the in-depth interviews
- Conclusion including recommendations and communication messages regarding the promotion of RAPEX

Annexes

- Terms of Reference
- List of interviewees
- Bibliography

STEP 5.6. FINAL MEETING WITH THE COMMISSION

The final meeting serves to present the draft final report to the Commission. Comments and feedback for the finalization of the report will be discussed.

STEP 5.7. FINALISING THE REPORT

On the basis of assessments and discussions with the Commission, and taking into account comments received during the review stage the report will be finalised. After final acceptance by the Commission the file is optimised for publication on the internet.

ANNEX II - SURVEY QUESTIONNAIRE

The survey questionnaire is displayed in English in this Annex. It has to be noted that this text has been translated into the 12 languages of the targeted countries.

This questionnaire was implemented on an online platform. The types of questions are indicated as follows:

TF=Text field

DD=Dropdown menu

CB=Check box

[I. IDENTIFICATION DATA] [Headings will be removed in final questionnaire]

The European Commission has commissioned Civic Consulting to conduct a survey of companies importing, distributing/ wholesaling and retailing toys, clothing/fashion items, cosmetics, electrical appliances/ houseware, and/or childcare articles.

The survey aims to investigate if and how you use RAPEX - the EU's Rapid alert system on non-food dangerous products - in your current business practices for product safety and how such use can be further promoted.

If you have any questions regarding the survey, please contact:

Katharina Schmidt

rapex@civic-consulting.de

Phone: +49 30 2196 2287

1. Please identify yourself

Note: Your personal information will be kept strictly confidential, will not be used by third parties or for other purposes. Survey results will only be presented in an aggregated form.

- a) Name of your company/ organisation [TF]
- b) Address [TF]
- c) Email address [TF]
- d) Phone number [TF]
- e) Contact person [TF]

2. Please provide information on your organisation

- a) Type of organisation [DD]
 - Company
 - Business association
- b) [If response to a) is 'Company'] How big is your company? [DD]

- Micro (not more than 10 employees, not more than € 2 million annual turnover)
- Small (not more than 50 employees, not more than € 10 million annual turnover)
- Medium (not more than 250 employees, not more than € 50 million annual turnover)
- Large (more than 250 employees, more than € 50 million annual turnover)

c) [If response to a) is 'Business association'] How big are the companies you mainly represent? (Multiple answers are possible) [CB]

- Micro (not more than 10 employees, not more than € 2 million annual turnover)
- Small (not more than 50 employees, not more than € 10 million annual turnover)
- Medium (not more than 250 employees, not more than € 50 million annual turnover)
- Large (more than 250 employees, more than € 50 million annual turnover)

d) [If response to a) is 'Company'] What is your main business? (Multiple answers are possible) [CB]

- Retail
- Distribution/wholesale
- Import
- Manufacturing
- Other [TF: Please specify]

e) [If response to a) is 'Business association'] Which type of companies do you mainly represent? (Multiple answers are possible) [CB]

- Retailers
- Distributors/wholesalers
- Importers
- Manufacturers
- Other [TF: Please specify]

f) In which of the following sectors do you operate? (Multiple answers are possible) [CB]

- Toys
- Clothing/fashion
- Cosmetics
- Electrical appliances/housewares
- Childcare articles
- Other [TF: Please specify]

g) In which country are you registered? [DD]

- Austria
- Belgium
- Bulgaria
- Croatia
- Cyprus
- Czech Republic
- Denmark
- Estonia
- Finland
- France
- Germany
- Greece
- Hungary
- Ireland
- Italy
- Latvia
- Lithuania
- Luxembourg
- Malta
- The Netherlands
- Poland
- Portugal
- Romania
- Slovakia
- Slovenia
- Spain
- Sweden
- United Kingdom
- Company is registered in multiple countries [TF: please specify]
- Other country [TF: please specify]

[If 'business association, go to question 8]

[II. PURCHASING STRATEGIES]

3. How do you typically identify products that you purchase? (Multiple answers are possible) [CB]

- Sales agents present new products
- At trade fairs
- Catalogues/websites of manufacturers/brands
- Catalogues/websites of wholesalers/importers
- Sector-specific magazines and media
- B2B online shops or platforms
- Competitors' websites
- Internet blogs and fora
- General internet research (e.g. Google)
- Customer requests
- Other [TF: Please specify]

4. How do you mainly purchase your products? (Multiple answers are possible) [CB]

- Through sales agents
- At trade fairs
- Directly from manufacturers
- Directly from wholesaler/importers
- Through B2B online shops or B2B online platforms (e.g. Alibaba) [TF: Please specify]
- We manufacture products ourselves
- Other [TF: Please specify]

5. Where do the products you purchase originate from? (Multiple answers are possible) [CB]

- EU
- Turkey
- North America
- China
- Asia (other than China)
- Other countries [TF: Please specify]
- Don't know

6. Which language do you use to purchase products? (Multiple answers are possible) [CB]

- Bulgarian
- Croatian
- Czech
- Danish
- Dutch
- English

- Estonian
- Finish
- French
- German
- Greek
- Hungarian
- Irish
- Italian
- Latvian
- Lithuanian
- Maltese
- Polish
- Portuguese
- Romanian
- Slovak
- Slovene
- Spanish
- Swedish
- Other [TF: Please specify]

7. Which sources of information do you use to check if the products you import or sell comply with safety rules? (Multiple answers are possible) [CB]

- Information from the manufacturer (e.g. declaration of conformity)
- Information from importer/wholesaler (e.g. test reports)
- Information from consumer organisations
- Certification/labels from independent testing organisations
- Newsletters from business associations
- RAPEX website
- OECD Global Recalls
- Websites of national authorities [TF: Please specify]
- Other [TF: Please specify]
- None

7.a [If answer to 7 is 'None'] Please indicate your main reason(s) for not consulting any source of information? (Multiple answers are possible) [CB]

- I trust authorities to check for product safety
- I trust my business partners to only provide safe products to me
- I don't have time to check for such information
- I don't think there is a need to check for such information

- I was not aware of such information
- Other [TF: Please specify]

[III. RAPEX]

8. Before participating in this survey, had you ever heard about RAPEX, the EU Rapid alert system on dangerous non-food consumer products? [DD]

- No
- Yes, but never visited RAPEX website
- Yes, and visited the website once
- Yes, and visited RAPEX website sometimes
- Yes, and visited RAPEX website about once a month
- Yes, and visited RAPEX website about once a week
- Yes, and visited RAPEX website daily

8.a [If answer to 8 is Yes]: Do you receive the RAPEX weekly email alerts or RSS feeds? [DD]

- Yes
- No

9aa. [If answer to 8 is 'Yes, and visited RAPEX website'] For what purposes did you visit the RAPEX website? (Multiple answers possible) [CB]

I checked . . .

- [only if response to 2a is 'company'] if products we sell are on RAPEX
- [only if response to 2a is 'company'] if products we intend to purchase are on RAPEX
- where products notified in RAPEX were manufactured
- where products notified in RAPEX were detected
- what types of products are often notified
- what types of hazards or non-compliances are often notified
- what types of measures were taken
- [only if response to 2a is 'company'] for information on a product I have notified
- Other [TF: please specify]

9ab. [If answer to 8 is 'No' or 'Yes but never visited RAPEX website'] Please have a brief look at the RAPEX website

<http://ec.europa.eu/consumers/safety/rapex/alerts/main/index.cfm?event=main.listNotifications>

9ac. [If answer to 9b is Yes] After having a brief look at the RAPEX website, for which purposes would you use it? (Multiple answers possible) [CB]

To check . . .

- [only if response to 2a is 'company'] if products we sell are on RAPEX
- [only if response to 2a is 'company'] if products we want to purchase are on RAPEX
- where products notified in RAPEX were manufactured
- where products notified in RAPEX were detected
- what types of products are often notified
- what types of hazards or non-compliances are often notified
- what types of measures are taken
- Other [TF: please specify]

9b. Do you find the RAPEX website useful for you? [DD: Yes, No, DK]

9cb. [If answer to 9b is No] Why do you think the RAPEX website is not useful for you? (Multiple answers) [CB]

- It is too time consuming
- Information does not help identify unsafe products
- Website is not user-friendly
- Wording of the text is too formal or confusing
- Information is not up-to-date
- I don't understand the language of the website
- Information is not relevant for my business
- Other reason(s) [TF: please specify]

10. Are there any changes or additional components which would increase your use of RAPEX? [TF]

10a. In addition to the suggestions you made, which of the following items would increase your use of RAPEX? Please select your top three items [CB]

- Improved website design
- Clearer and more concise explanations
- More graph illustrating the data
- Video explaining how to use RAPEX
- Well operating search function
- Option for user-friendly print-outs of the database
- More clustered information e.g. by sector
- Clear definitions of categories used on the website (e.g. for risk levels)
- High resolution pictures of products

- Link to legal documents referred to in the notification
- Information on number of products affected by a notification
- Information indicating by whom a product was notified
- Option to switch the website into native language
- App for mobile phones
- Information through social media e.g. Facebook, Twitter
- Additional product information [TF: Please specify]

11. In your view, how could RAPEX be effectively promoted among companies in your sector? Please select your top three items [CB]

- Information campaigns on product safety and RAPEX
- Seminar on RAPEX, its benefits and how to use it
- Presentation of RAPEX at trade fairs
- Promotion of RAPEX through social media e.g. Facebook, Twitter
- App for mobile phones
- Promotion of RAPEX in business magazines
- Business associations informing members about RAPEX
- Chambers of commerce informing companies about RAPEX
- National authorities promoting RAPEX
- Other communication tools [TF: Please specify]

12. To sum up: What are the most important features of RAPEX for you? Please select your top three items [CB]

I can . . .

- check which products are unsafe
- check where dangerous products come from
- [only if response to 2a is 'company'] inform myself about new hazards to look out for when purchasing products
- [only if response to 2a is 'business association'] inform myself about new hazards my member companies have to look out for
- [only if response to 2a is 'company'] check what safety legislation I have to comply with
- [only if response to 2a is 'business association'] check what safety legislation my member companies have to comply with
- learn about the measures taken by authorities
- learn about recalls of products
- [only if response to 2a is 'company'] check for information on a product I have notified
- Other [TF: Please specify]

13. If you have additional comments or suggestions, please include them here. [TF]

ANNEX III - QUESTIONNAIRE FOR INTERVIEWS

GUIDING QUESTIONS FOR COMPANIES

1. Please shortly introduce yourself.
2. Please shortly provide information on your company e.g. in terms of the size of the company, the sector and country your company operates in, your main business model (retail, distribution, import).
3. How do you typically identify the products that you want to purchase and resell?
4. Through which channels do you mainly purchase the products that you sell?
5. Which language do you use to purchase products?
6. Which sources of information do you use to check if the products imported or sold by you are safe/ comply with existing safety rules?
 - 6.a What is your reason for not consulting any source of information to check if the products imported or sold by you are safe/ comply with existing safety rules?
7. Before participating in this study, have you ever heard about RAPEX, the EU Rapid alert system on dangerous non-food consumer products?
 - 7.a Do you receive the RAPEX weekly email alerts?
8. Would you think the RAPEX website is useful for you? For what purposes do you use the RAPEX website?
 - 8.a Why do you think the website of RAPEX is not useful for you?
9. Are there any changes or additional components which would increase the use of product safety information provided by RAPEX in your business?
 - 9.a Do you have suggestions for improving RAPEX?
10. In your view, how could RAPEX be effectively promoted among companies in your sector?
 - 10.a. Do you have suggestions for communication channels?
 - 10.b. Do you have suggestions for communication messages?
11. To sum up: What are the most important features of RAPEX for you?
12. Do you have additional comments or suggestions that you would like to share?

GUIDING QUESTIONS FOR BUSINESS ASSOCIATIONS

1. Please shortly introduce yourself.
2. Please shortly provide information on your organisation and the members of your organization e.g. in terms of the size of the companies you represent, the sectors and countries you cover, the main business model of your members (retail, distribution, import).
3. How do your member companies typically identify the products that they want to purchase and resell?
4. Through which channels do your member companies mainly purchase the products that they sell?
5. Which language do your member companies use to purchase products?
6. Which sources of information do your member companies use to check if the products imported or sold by them are safe/ comply with existing safety rules?
 - 6.a In your opinion, what is the reason of your member companies for not consulting any source of information to check if the products imported or sold by you are safe/ comply with existing safety rules?
7. Before participating in this study, have you ever heard about RAPEX, the EU Rapid alert system on dangerous non-food consumer products?
 - 7.a Do you receive the RAPEX weekly email alerts? Do you know if your members receive the RAPEX weekly email alerts?
8. Would you think the RAPEX website is useful for your member companies? For what purposes would your member companies use the website of RAPEX?
 - 8a. Why do you think the website of RAPEX is not useful for your member companies?
9. Are there any changes or additional components which would increase the use of RAPEX information by your member companies in their business practice?
 - 9.a Do you have suggestions for improving RAPEX to make it more useful to your member companies?
10. In your view, how could RAPEX be effectively promoted among your member companies and amongst companies not members of any business association but operating in the same sector as your member companies?
 - 10.a. Do you have suggestions for communication channels?
 - 10.b. Do you have suggestions for communication messages?
11. To sum up: In your view, what are the most important features of RAPEX for your member companies?
12. Do you have additional comments or suggestions that you would like to share with us?

ANNEX IV – SUGGESTIONS FOR THE IMPROVEMENT OF THE RAPEX WEBSITE BY SURVEY PARTICIPANTS

Table 8: Overview of recommendations for promoting RAPEX.

Key issues	Comments/suggestions by participants
Operation of the RAPEX website	
Amount of information provided	Too much information is provided, which makes it too tiring to look through.
	You get tired already on the front page of the website. Too much info! Where to start?
	The website is too complicated to use for a retail store because there are too many product categories to look through.
Translation	Translation of the RAPEX website into native language.
	It would be nice if the website had been translated into Dutch.
	Translation of the website into French and redesign of the website. I used the websites, in English, but I had no idea where to find my information, so I gave up.
	Translation in Greek.
User-friendliness of the website and clustering of information	The website layout is not very user-friendly.
	If the user interface were redone to make it more friendly.
	The layout is not very user-friendly.
	It would be helpful if you could make sector specific (so for example a sub-section just for toys).
	I would like to see the product categories listed together.
Search function	It would be helpful if it were possible to filter recalls to specific market sectors, for example, recalls relevant to the toy industry (this means all toys, and associated products, such as child seats for cars, cribs, etc.)
	Would be useful if filtering by product family (High Chair, Carry Cot, Stroller, etc.) would be possible. It would also be helpful if the database could be queried for categories of hazard and the measures taken by the authorities.
	It is not possible to select the country that issued the warning.
	What would be helpful to add in RAPEX search function would be: 1) an entry on regulation - so you can tick if you want to monitor product compliance with e.g. REACH 2) a link under

	<p>product category explaining what is meant by each category, what the relevant legislation is and which products fall under the category.</p> <p>Search by product.</p>
Content provided on the RAPEX website	
Information on the notified product	More specific information on the product notified.
	Better photos of the products being recalled.
	Product information is provided incomplete or improperly, which makes it difficult to identify a product.
	Improved documentation.
	The website does not clearly identify the responsible product or your brand or your data. It is important that, if this information is given, it is given correctly and completely.
	Specify EAN numbers of products.
Additional categories of information	Reference to the legal clause or standard which has been applied for the notification.
	Reference to the clause of the standard which has been disapproved. - More information about the risk (risk, probability).
	It would also be helpful if the numbers of product affected by the notice were included & by whom it was notified, with the manufacturer identified.
	Supplier information.
	Where counterfeit items have been found, more information relating to the brand or company supplying them would be useful.
	A category of products removed from the market for safety reasons not EMC, RoHS, etc.
	If there was information about raw material/packaging suppliers.
Comprehensibility of information provided	It is not clear whether the notified product also is for sale in the Netherlands through physical stores.
	There are some misunderstandings about definitions used and these need to be well established.
	Greater clarity about why the products are registered and why they constitute a "serious risk".

	<p>We find it difficult to identify the root cause for the product defect using RAPEX. It is the root cause that can help other companies to look up and prevent similar defects on their own products. It is also difficult to get a clear understanding why a product defect has been given serious risk or other risk level. Also wish to be able to identify in what step of the supply chain the product defect was detected, for example during import, at sales floor etc. A link from the RAPEX site to either the notifying market surveillance authority's website and/or the concerned company's website would be useful in order to get more info.</p>
<p>Weekly alerts</p>	
<p>Failure of registration to weekly alerts</p>	<p>I have been unable to register for the automatic updates and when I asked directly to RAPEX no-one could help me to resolve this. I therefore do not use it as often as I can.</p>
	<p>RAPEX weekly alerts are not sent anymore.</p>
<p>Awareness about weekly alerts</p>	<p>I will wish to receive alerts weekly to systematically be informed.</p>
	<p>Ongoing information about the products by email.</p>
	<p>Weekly reminder by the local business association about RAPEX.</p>
	<p>Mailing alerts to be updated.</p>
<p>Risk of products notified</p>	
<p>Type of risks to be published</p>	<p>Product notifications published on the RAPEX website should be assessed more carefully. The selection of notifications published seems to be arbitrary and not related to the actual risk of products.</p>
	<p>The control to notify/publish products must be fundamentally reconsidered. Alerts notified in RAPEX are dependent on the mercy of individual state testing laboratories and market supervisors, which unfortunately have no idea of the actual circumstances. It is important to organize another independent institution which checks and monitors products again.</p>
	<p>Notifications that are serious and immediate are the main concern. Minor notifications are distracting. Recalls made when the reason is incorrect should be filtered out by the Commission.</p>
	<p>RAPEX data is too easily misinterpreted. It contains a mixture of voluntary and mandatory withdrawals. The distinction between these might not be understood by the casual user of the data. In addition, it is quite obvious that many EU Member States do not apply any form of risk assessment before making notifications. This means that many of the notifications deal</p>

	<p>with minor matters that do not represent serious risks to the consumer. RAPEX data should in some way be filtered either to remove those for which the rules have not been applied or to make a clear distinction between less serious matters and those which are serious.</p>
<p>Understanding of risk assessment and risk categories</p>	<p>Improved information as to how risk has been evaluated. All too often relies simply on a failure against a standard.</p>
	<p>Adding the actual risk assessment to be able to gain a better understanding of the actual hazard & risk.</p>
	<p>Greater clarity about why the products are registered and why they pose a "serious risk".</p>
	<p>More information about the risk (probability etc.).</p>
	<p>It would be useful to know whether the company has filed a clarification and defence before the competent national authority and its result.</p>

Source: Civic Consulting.

ANNEX V - REFERENCES

Legal documents

- Commission Decision (2009/18/EC) of 22 December 2008 on the compliance of standard EN 1273:2005 on baby walking frames with the general safety requirement of Directive 2001/95/EC of the European Parliament and of the Council and publication of the reference of the standard in the Official Journal, 2009, OJ L8/29.
- Commission Decision (2010/15/EU) of 16 December 2009 laying down guidelines for the management of the Community Rapid Information System 'RAPEX' established under Article 12 and of the notification procedure established under Article 11 of Directive 2001/95/EC (the General Product Safety Directive), 2010, OJ L22/1.
- Commission Decision (2011/196/EU) of 29 March 2011 on the compliance of standard EN 14682:2007 on cords and drawstrings on children's clothing with the general safety requirement of Directive 2001/95/EC of the European Parliament and of the Council and publication of the reference of the standard in the Official Journal, 2011, OJ L82/8.
- Directive (2001/95/EC) of the Parliament and the European Council of 3 December 2001 on general product safety, 2002, OJ L11/4.
- Directive (2006/95/EC) of the Parliament and the European Council of 12 December 2006 on the harmonisation of the laws of Member States relating to electrical equipment designed for use within certain voltage limits, 2006, OJ L374/10.
- Directive (2009/48/EC) of the Parliament and the European Council of 18 June 2009 on the safety of toys, 2009, OJ L170/1.
- Directive (2014/35/EU) of the Parliament and the European Council of 26 February 2014 on the harmonisation of the laws of the Member States relating to the making available on the market of electrical equipment designed for use within certain voltage limits, 2014, OJ L96/357.
- Proposal for a Regulation of the Parliament and the European Council (2013/0048 (COD)) on market surveillance of products and amending Council Directives 89/686/EEC and 93/15/EEC, and Directives 94/9/EC, 94/25/EC, 95/16/EC, 97/23/EC, 1999/5/EC, 2000/9/EC, 2000/14/EC, 2001/95/EC, 2004/108/EC, 2006/42/EC, 2006/95/EC, 2007/23/EC, 2008/57/EC, 2009/48/EC, 2009/105/EC, 2009/142/EC, 2011/65/EU, Regulation (EU) No 305/2011, Regulation (EC) No 764/2008 and Regulation (EC) No 765/2008 of the European Parliament and of the Council, 2013, retrieved 29 April 2015 from http://ec.europa.eu/consumers/consumers_safety/product_safety_legislation/product_safety_and_market_surveillance_package/docs/psmsp-surveillance_en.pdf
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