The General Product Safety Regulations 2005

Notification guidance for local authorities

CONTENTS

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1. Introduction

These summary guidelines have been produced by the DTI to help enforcement officers determine when they need to inform the Department about unsafe consumer products in line with the various notification requirements set out in Directive 2001/95/EC on general product safety, and implemented by the General Product Safety Regulations 2005.

The guidelines are simplified ready reference desk notes intended as an aid to enforcement officers who already have some understanding of the notification process and should be read in conjunction with the Regulations guidance. They do not replace the notification references in the 2005 Regulations, nor the much more extensive European Commission Guidelines for notifying safety risks with consumer products, which may still need to be referred to from time to time. The Commission guidelines can be found at the following address:
http://europa.eu.int/comm/dgs/health_consumer/dyna/RAPEX/RAPEX_en.cfm

The notification procedures covered are those identified under the following Regulations in the General Product Safety Regulations 2005:

***Regulation 9(1)-(3)*:** the new procedure introduced to support the obligation on producers and distributors to notify problems with the products they supply, and what they have done to remove the risk to consumers;

***Regulation 33(2)*:** the exchange of information on products where action has been taken to restrict their supply, but which are not deemed to present a serious risk (see Risk Assessment annex);

***Regulation 33(4)*:** the RAPEX procedure for notifying products that are found to present a serious risk to consumers and which require urgent action to be taken (see Risk Assessment annex). This will include notifications received under Regulation 9 where these are considered to pose a serious risk.

The RAPEX requirements also apply to products covered by other vertical directives which lack a similar notification requirement – **e.g. Toys, Low Voltage, Personal Protective Equipment, Cosmetics, Machinery, Motor Vehicles, Construction Products etc**.

Where a RAPEX notification obligation is seen to co-exist with the need to make a Safeguard notification, only the RAPEX notification needs to be made. This information will then be passed on to the relevant Safeguard contact by the central RAPEX contact (indicated on the RAPEX notification form at Annex II). Otherwise, Safeguard notifications should be made directly to the Safeguard contact for the product in question. A list of Safeguard contacts will be made available on the DTI website.

With all notifications it is important that the correct forms are used and that the information is as complete as possible. The forms for Regulations 9 and 33 notifications are annexed to this guidance.

Additionally, the responsible enforcement authority should inform the home authority (where they are not one and the same). Where the responsible Local Authority embraces a Trading Standards function it would also be good practice to notify the TS Interlink mechanism.

The specific requirements of the each of the notification procedures are explained further in the following sections.

2. Regulation 33(4) (RAPEX) notifications

A RAPEX notification should be prepared and submitted to the DTI when it is learned that a product on the UK market (or elsewhere on the European market if the manufacturer is based in the UK) presents a serious risk to consumers and urgent action is required to remove that risk. Enforcement officers should try to assess the severity of the situation making some use of the Commission's risk assessment criteria set out in Annex I. Although this approach to risk assessment is not mandatory it is expected that the Commission's guidance will be used increasingly by enforcement authorities in other Member States as a basis for notifications (including RAPEX), which UK enforcement officers will need to reconcile with their own assessment of risk when the same product is found on the UK market. There is nothing to prevent parallel or exclusive use of one of the many other methodologies (e.g. nomograph) where this is seen to be more helpful.

The Commission's guidance also advises that a RAPEX notification may be made based on information relating to a serious risk before a decision on appropriate action has been taken on the assumption that measures will be adopted. Since the formal legal notification requirements do not make such reference, if information contained in such a partial notification were made public by an authority and subsequent action were not taken promptly where it was justified under the Regulations publication might be held to be contrary to the judgement in the case of R v Liverpool Council ex parte Baby Products Association (the 'Babywalker Judgement'). Since the Secretary of State is duty bound to forward all notifications to the European Commission this does not constitute publication. However, enforcement authorities might, if they submit any such advance notifications, wish to make it clear that these are for information only and not for publication prior to a measure in the UK having been taken.

Measures and actions related to risks where the effects cannot go beyond the UK are excluded from the scope of RAPEX (though may still require some Safeguard action). However, notifications can still be made in such cases where the local authority feels strongly that the information would be of value to the Commission and other Member States.

Content of RAPEX Notifications

RAPEX notification should be made using the form at Annex II.

The information provided should be as complete as possible and should be submitted electronically to the DTI (electronic forms will be available alongside this guidance on TS Interlink and on the DTI website). Gaps in available information should not prevent a notification being made but it should be indicated when the missing information is expected to be available.

Notifications should include:

- A detailed description of the product (including photographs, if possible). The description should be sufficient to avoid confusion with a similar product;

- The risk assessment, including electronic copies (if possible) of tests carried out;

- The scope and nature of the measures taken to avoid the risk, their duration and follow-up. The authority should also inform (by means of a follow-up notification) of any amendment to these measures and of the final decision on the product. It should be indicated whether the measure is definitive, or could be/is subject to appeal;

- The information needed to identify the product's distribution channels and its origin, in particular its producer, importer or exporter, as well as other information related to traceability.

The following is an indicative list of the measures and actions which may require a RAPEX notification:

- Imposing conditions prior to the marketing of a product;

- Requiring a product to be marked with warnings concerning any risk;

- Alerting consumers about a risk related to a product;

- Banning temporarily or definitively the supply, offer to supply or the display of a product;

- Organising the withdrawal or the recall of a product;

- Ordering producers and distributors to withdraw a product, recall it from consumers, and destroy it, or agreeing with producers/distributors to do the same;

- Agreeing with producers and distributors to take actions to avoid the risks.

Enforcement authorities should notify all such measures, even if an appeal against them is likely.

Timetable

A RAPEX notification must be communicated to DTI within 10 calendar days of the Local Authority decision to take measures to remove the risk (whether or not this is in agreement with the producer/distributor), or of appropriate voluntary action being taken in agreement with the Local Authority (whichever is sooner).

In the case of notification requiring emergency action from Member States the notification should be made as soon as possible and within 3 calendar days of the measure being adopted.

Other Actions

Member states may inform the European Commission of the existence of serious risks before deciding to adopt measures or take action, of serious risks relating to specific batches of products that have been withdrawn from the market and of decisions by Customs Authorities to block the import of products presenting a serious risk at the EU border. Such notifications should be made as soon as possible and no later than 10 calendar days after the identification of the risk/event as appropriate.

Reactions

The General Product Safety Directive requires Member States to notify the Commission when they find products on their home market that have been the subject of RAPEX notifications submitted by other Member States. RAPEX notifications are posted on TS Interlink in the UK (summarised RAPEX alert information is also to be found on the Commission's website - http://europa.eu.int/comm/dgs/health_consumer/dyna/rapex/create_rapex.cfm ?rx_id=33). On becoming aware of a RAPEX notification (particularly if it indicates that the product could have been marketed in the UK) local authorities are asked to investigate whether the product is on their local market, and to notify the central DTI contact if it is found. These 'reaction' notifications should be made using the Reaction form provided at Annex III, and should indicate whether the local authority agrees with the original risk assessment and what action it proposes to take to remove the risk.

The Commission requires Member States to submit 'reactions' as soon as possible and in any event no later than 20 calendar days after the RAPEX notification is communicated to the competent authorities (the local authorities) if this relates to a notification requiring emergency action from Member States, or no later than 45 days in respect of a serious risk. Local authorities should aim to comply with these deadlines whenever possible. Additionally, if the product is manufactured in the UK the Home Authority should contact the producer to ensure the problem is resolved at source and submit a reaction within 15 Calendar days.

3. Regulation 33(2) (Non-serious risk) notifications

Where measures are taken to restrict the placing on the market of products, or require their withdrawal or recall, but the risk is not considered to be serious, there is a requirement to notify the measures and the reasons for adopting them to DTI. These notifications should be made using the form provided at Annex II, and within 15 calendar days of taking a decision to adopt such measures.

If the enforcement authority considers that the effects of the risk do not, or cannot, go beyond the UK a notification need not be made, though an authority may still feel that some information on the case would be of value to the Commission and to other Member States. **Notifications made under Regulation 33(2) should be considered as additional to any Safeguard obligations.**

4. Regulation 9 (Producer/Distributor) notifications

This is a new obligation on producers and distributors to notify Local Authorities when they become aware that a product they have placed on the market is unsafe, and it is likely that initially many producers and distributors will be unaware of this obligation.

A separate guide for producers and distributors is being produced for this purpose and will be available on the DTI website at this address http://www.dti.gov.uk/ccp/topics1/safety.htm#gpsr Local Authorities are advised to also make this available on their websites.

Who should notify

Producers and distributors should be advised that they are both under an obligation to notify and as soon as a safety issue has been identified. However to avoid a proliferation of duplicate notifications and in any case as part of their role of monitoring the safety of the products they sell, distributors should make their concerns known to producers. Where they are both in the UK, discussions should include who is to make the notification. Distributors should however be prepared to notify where they believe a problem exists even if the producer claims otherwise or does not make a notification himself.

In general, it is expected that the local authority first contacted will be the one to assist with and process the notification (ultimately forwarding this, and possibly also a RAPEX notification, on to the DTI central contact), though there will be times when it is sensible for another local authority to do this. In any event the Home Authority should always be informed when another local authority is approached in respect of a Regulation 9 notification (which is more likely to happen with distributors, particularly small retailers).

A notification must be made even if the problem is only thought to exist in another Member State. In such cases, the Local Authority must be informed if a distributor in the other country has also been instructed to make a

notification there, and this must be made clear to the DTI when sending the notification on to the national contact point.

It should be noted, however, that the DTI has undertaken to fulfil the obligation placed by the Directive on producers/distributors to notify the enforcement authorities in all the Member States in which the product has been marketed (as indicated in the Directive). Businesses therefore only have to notify their Local Authority, or VOSA, MHRA etc where these are the most appropriate enforcement authorities for the product concerned.

What information is needed

Local Authorities will probably find that they often have to work with the business to ensure the form at Annex IV is properly completed, before submitting it to the DTI on the business's behalf. The producer/distributor should be strongly encouraged to prepare an electronic notification.

The information provided on the form should include details on the following:

- The enforcement authority receiving the notification;
- The producer/distributor;
- The product involved, including electronic photograph;
- The hazard presented by the product, including risk assessment and any reported accidents;
- The corrective action taken or planned;
- Other companies in the supply chain.

Commission guidance on producer/distributor notifications can be found at - http://europa.eu.int/comm/consumers/cons_safe/prod_safe/gpsd/guidelines_en.htm These guidelines should be used by enforcement authorities to guide producers and distributors through the notification process.

When an enforcement authority believes that a producer/distributor notification represents a serious risk and requires urgent action it should also submit a RAPEX notification to DTI along with the original producer/distributor notification.

Timetable

Whenever possible, businesses should be reminded that they must inform their local authority of a safety problem without delay. Notifications are required to be made to the national contact point within 10 calendar days of notifiable information becoming available. Sections 1 to 5 of the form should be filled in immediately and Section 6 submitted when the missing information has been collected. A timetable for collecting the missing information should be transmitted at the same time the first notification is made.

5. Notifications concerning chemicals

With a measure notified pursuant to regulation 33(2) or regulation 33(4) in respect of a chemical substance or preparation, the enforcement authority should provide as soon as possible either a summary or the references of the relevant data relating to the substance or preparation considered and to known and available substitutes, where such information is available.

They should also communicate the anticipated effects of the measure on consumer health and safety together with the assessment of the risk carried out in accordance with the general principles for the risk evaluation of chemical substances as referred to in Article 10(4) of Regulation (EEC) No 793/93 in the case of an existing substance, or in Article 3(2) of Directive 67/548/EEC in the case of a new substance.

6. Decisions to Revoke, Vary or Amend the Measures Adopted

All such decisions must be notified to the national contact point within 5 calendar days.

7. Confidentiality

Confidentiality could be requested if disclosure of information would undermine court proceedings, monitoring and investigation activities or professional secrecy, unless there were an overriding public interest in disclosure of information to protect the health and safety of consumers. Confidentiality can also be required for annexes to the notification, such as legal proceedings, that do not contain information relevant for consumer protection and need to be protected.

8. Products excluded from RAPEX

Certain products are excluded from RAPEX because they are covered by equivalent notification mechanisms, for example pharmaceuticals (covered by Directives 75/319/EC and 81/851/EEC) and food and feed (Regulations EC No. 178/2002). Further information on the relationship between different notification procedures established by Community law can be found in the Commission's "Guidance document on the Relationship between the GPSD and Certain Sectoral Directives" which can be found at: http://europa.eu.int/comm/consumers/cons_safe/prod_safe/gpsd/guidance_gpsd_en.pdf

ANNEX I - METHODOLOGICAL FRAMEWORK FOR FACILITATING CONSISTENT RISK ESTIMATION AND EVALUATION

The following text is based on the framework developed for the RAPEX Guidelines and is presented here in order to assist companies in assessing the level of a risk and deciding whether a notification to the authorities is necessary. The guidelines in this Annex II are not exhaustive and do not attempt to take into account all possible factors. The companies should judge each individual case on its merits taking into account the criteria set out in these guidelines as well as their own experience and practice, other relevant considerations and appropriate methods.

A consumer product may present one or more intrinsic hazards. The hazard may be of various types (chemical, mechanical, electrical, heat, radiation, etc.). The hazard represents the intrinsic potential of the product to damage the health and safety of users under certain conditions.

The severity of each type of hazard may be given a rating, based on qualitative and sometimes quantitative criteria related to the type of damage that it is liable to produce.

It may happen that not all individual products present the hazard in question, but only some of the items placed on the market. The hazard may in particular be related to a defect that appears only in some of the products of a certain type (brand, model, etc.) placed on the market. In such cases the probability of the defect/hazard being present in the product should be considered.

The potential of a hazard to materialise as an actual negative effect on health/safety will depend on the degree to which the consumer is exposed to it when using the product as intended or as could reasonably be expected during its lifetime. In addition the exposure to certain hazards may in some cases involve more than one person at a time. Finally when determining the level of the risk presented by a product by combining the severity of the hazard with the exposure, consideration should be given also to the ability of the exposed consumer to prevent or react to the hazardous situation. This will depend on the evidence of the hazard, the warnings given and the vulnerability of the consumer who may be exposed to it.

Taking into account the above considerations, the following conceptual approach may assist businesses when deciding whether a specific hazardous situation caused by a consumer product requires a notification to the competent authorities.

It is recommended that assessments be carried out by a small team who have knowledge and experience of the product and its hazards. Assessors may have to make subjective judgements if objective data is not available and it is hoped this procedure will help them to make consistent and reasoned judgements about actual or potential risks.

The assessor should analyse the information collected and use the risk assessment table as follows:

1. As a first step, use Table A to determine the gravity of the outcome of a hazard, depending on both its severity and the probability of it occurring under the conditions of use considered, and of the possible health/safety effect related to the intrinsic hazardous characteristics of the product.

2. As a second step, use Table B to further assess the gravity of the outcome depending on the type of consumer and, for non-vulnerable adults, whether the product has adequate warnings and safeguards and whether the hazard is sufficiently obvious to make it possible to grade the risk level qualitatively.

Table A - Risk estimation: severity and probability of health/safety damage

In Table A the two main factors affecting the risk estimation, namely the severity and probability of health/safety damage, are combined. The following definitions of severity and probability have been drawn up to assist in the selection of appropriate values.

Severity of injury

The assessment of severity is based on consideration of the potential health/safety consequences of the hazards presented by the product considered. A grading should be established specifically for each type of hazard[1].

The assessment of severity should also take into account the number of people who could be affected by a dangerous product. This means that the risk from a product which could pose a risk to more than one person at a time (e.g. fire or gas poisoning from a gas appliance) should be classified as more severe than a hazard which can only affect one person.

The initial risk estimation should refer to the risk to any person exposed to the product and should not be influenced by the size of the population at risk. However, it may be legitimate for the companies to take account of the total

[1] As an example, for certain mechanical risks the following definitions of the severity classifications may be proposed, with typical corresponding injuries:

Slight	Serious	Very Serious
<2% incapacity usually reversible and not requiring hospital treatment.	2 – 15% incapacity usually irreversible requiring hospital treatment	>15% incapacity usually irreversible
Minor cuts	Serious cuts	Serious injury to internal organs
	Fractures	Loss of limbs
	Loss of finger or toe	Loss of sight
	Damage to sight	Loss of hearing
	Damage to hearing	

number of people exposed to a product in deciding on the type of action to be taken.

For many hazards it is possible to envisage unlikely circumstances that could lead to very serious injury, e.g. tripping over a cable, falling and banging one's head, leading to death, although a less serious outcome is more likely. The assessment of the severity of the hazard should be based on reasonable evidence that the effects selected for characterizing the hazard could occur during foreseeable use. This could be the worst-case experience involving similar products.

Overall Probability

This refers to the probability of negative health/safety effects to a person exposed to the hazard. It does not take into account the total number of people at risk. Where the guide refers to the probability of a product being defective, this should not be applied if it is possible to identify each one of the defective samples. In this situation, the users of the defective products are exposed to the full risk and the users of the other products to no risk.

The overall probability is the combination of all the contributing probabilities such as:

- the probability of the product being or becoming defective (if all products carry the defect then this probability would be 100%);

- the probability of the negative effect materialising for a normal user who has an exposure corresponding to the intended or reasonably expected use of the defective product.

These two probabilities are combined in the following table to give an overall probability which is entered into Table A.

Overall Probability of Health/Safety Damage		Probability of hazardous product		
		1%	10%	100% (All)
Probability of health/safety damage from regular exposure to hazardous product	Hazard is always present and health/safety damage is likely to occur in foreseeable use	Medium	High	Very High
	Hazard may occur under one improbable or two possible conditions	Low	Medium	High
	Hazard only occurs if several improbable conditions are met	Very Low	Low	Medium

Combining the severity and overall probability in Table A gives an estimation of the gravity of the risk. The accuracy of this assessment will depend upon the quality of the information available to the company. However, this

assessment needs to be modified to take account of society's perception of the acceptability of the risk.

Society accepts much higher risks in some circumstances such as motoring, than in others, such as children's toys. Table B is used to input this factor.

Table B – Grading of Risk: type of person, knowledge of the risk and precautions

Society accepts higher risks in some circumstances than in others. It is considered that the main factors affecting the level of risk are the vulnerability of the type of person affected and for non-vulnerable adults, the knowledge of the risk and the possibility of taking precautions against it.

Vulnerable people

The type of person using a product should be taken into account. If the product is likely to be used by vulnerable people, the level of risk which should be notified should be set at a lower level. Two categories of vulnerable people are proposed below, with examples:

Very vulnerable	Vulnerable
Blind	Partially sighted
Severely Disabled	Partially disabled
Very old	Elderly
Very young (<3 years)	Young (3-11 years)

Normal adults

The adjustment of the seriousness of risk for non-vulnerable adults should only apply if the hazard is obvious and necessary for the function of the product. For non-vulnerable adults the level of risk should be dependent on whether the hazard is obvious and whether the manufacturer has taken adequate care to make the product safe and to provide safeguards and warnings, especially if the hazard is not obvious. For example, if a product has adequate warnings and safeguards and the hazard is obvious, a high gravity of outcome may not be serious in terms of grading the risk (Table B), although some action may be needed to improve the safety of the product. Conversely, if the product does not have adequate safeguards and warnings, and the hazard is not obvious, a moderate gravity of outcome is serious in terms of grading the risk (Table B).

Risk Assessment of consumer products for the GPSD

This procedure is proposed to assist companies when deciding whether a specific hazardous situation caused by a consumer product requires notification to the authorities

Table A - Risk Estimation

Probability of Health/Safety Damage	Severity of Health/Safety Damage: Slight	Serious	Very Serious	Overall Gravity of Outcome
		Very High	High	Very High
Very High		High	Medium	High
High		Medium	Low	Moderate
Medium		Low	Very Low	Low
Low		Very Low		Very low

Table B – Grading of Risk

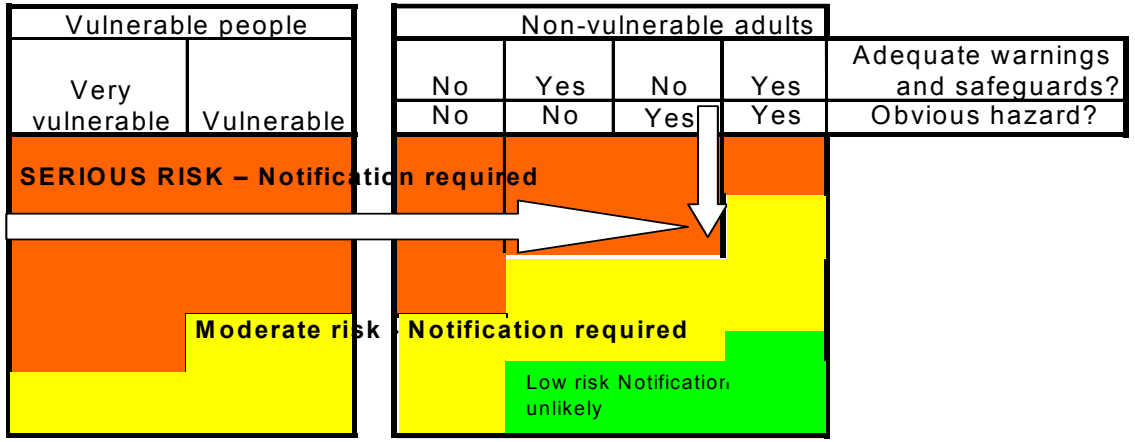

Table A is used to determine the gravity of the outcome of a hazard, depending on the severity and probability of the possible health/safety damage (see tables in notes)

Table B is used to determine the rating of the gravity of risk depending on the type of user and, for non-vulnerable adults, whether the product has adequate warnings and safeguards and whether the hazard is sufficiently obvious

<u>Example</u> (indicated by the arrows above)

A chain saw user has suffered a badly cut hand and it is found that the chain saw has an inadequately designed guard which allowed the user's hand to slip forward and touch the chain. The company's assessor makes the following risk assessment.

Table A - The assessment of probability is **High** because the hazard is present on all products and may occur under certain conditions. The assessment of severity is **Serious** so the overall gravity rating is **High.**

Table B – The chain saw is for use by non-vulnerable adults, presents an obvious hazard but with inadequate guards.

The **High** gravity is therefore intolerable so a **serious risk** exists.

ANNEX II – NOTIFICATION FORM

☐ **Regulation 33(2) notification (Article 11 of Directive 2001/95/EC)**

☐ **Regulation 33(4) RAPEX notification (Article 12 of Directive 2001/95/EC)**

☐ **Requiring emergency action from Member States**

GENERAL INFORMATION

1. Notifying country:	United Kingdom
2. Date of notification:	

PRODUCT

3. Category:	
4. Product Name:	
5. Brand:	
6. Type/number of model:	
7. Type of energy used:	
8. Standards or regulations applicable:	
9. Proof of conformity:	
10. Description and dimensions of product and packaging:	
11. Photograph or drawing of product (Please provide electronically wherever possible as separate attachment - Max 2MB):	

MANUFACTURER

12. Name and address of the manufacturer:	
13. Name and address of exporter:	
14. Country of origin of product:	

IMPORTERS AND OTHERS

15. Importers or authorised representatives:	
16. Retailers or authorised representatives:	

DANGER

17. Nature of danger/risk (please explain fully):	
18. Significant results of tests (please summarise the findings of the test report, and provide an electronic copy of the report):	
19. Accidents which have happened:	

MEASURES ADOPTED

20. Voluntary measures:	
21. Compulsory measures:	
22. Justification for the adoption of measures:	
23. Scope:	
24: Date of entry into force:	
25. Duration:	
26. Principal organisation which above action was taken against or which withdrew product from sale:	Name: Address:

OTHER INFORMATION

27. Other information:	
28. National contact point:	Ms Yeshim Halil General Product and Services Safety Consumer and Competition Policy Directorate Department of Trade and Industry 1 Victoria Street London SW1H 0ET Tel: 020 7215 0362 Fax: 020 7215 0339 Email: RAPEX.unit@dti.gsi.gov.uk Alternative contact if above is not available: Kehinde Macauley Tel: 020 7215 0033 Fax: 020 7215 0339

29. Is the information confidential?	
30. Justification of request:	

The details below will not be included on notification sent to Commission

Details of Enforcement Authority:	Authority/Area office: Address: Name of contact: Tel: Fax: Email:

ANNEX III – REACTION NOTIFICATION FORM

Reaction to RAPEX notification submitted by other Member States

(To be completed by Local Authorities if product RAPEX notified by other Member States is found on the UK market)

Reacting country:	United Kingdom
Date of reaction:	
Identification:	
Notification number:	
Name of dangerous product:	
Voluntary measures taken:	
Obligatory measures taken:	
Scope:	
Date of entry into force:	
Duration:	
Other information:	
National contact point:	Miss Yeshim Halil General Product and Services Safety Consumer and Competition Policy Directorate Department of Trade and Industry 1 Victoria Street London SW1H 0ET United Kingdom Tel: + 44 20 7215 0362 Fax:+ 44 20 7215 0339 Email: RAPEX.unit@dti.gsi.gov.uk Alternative contact if above is not available: Kehinde Macauley Tel: + 44 20 7215 0033 Fax:+ 44 20 7215 0339

The details below will not be included on notification sent to Commission

Details of Enforcement Authority:	Authority/Area office: Address: Name of contact: Tel: Fax: Email:

ANNEX IV – PRODUCER/DISTRIBUTOR NOTIFICATION FORM

Form for use by producers and distributors in making a Regulation 9 notification of dangerous products to the Local Authorities

Section 1: Details of AUTHORITY(IES)/COMPANY(IES) receiving the notification form	
Authority/Contact name/Address/Telephone/Fax/E-mail/Website	
Other companies notified	
Section 2: Details of BODY/PERSON completing the notification form	
Organisation	
Contact name, responsibility, Address/Telephone/Fax/E-mail/Website	
Section 3: Details of PRODUCER (if different from above)	
Producer or Producer 's representative Name/Address/ Tel/Fax/E-mail/Website	
Section 4: Details of PRODUCTS involved	
Category. Brand or trademark. Model Name(s)or N°/ Bar code. Country of origin	
Description/Photograph	
Section 5: Details of HAZARD	
Description of the hazard and possible health/safety damages and analysis carried out	
Record of accident(s)	
Section 6: Details of corrective ACTIONS already taken	
Types/Scope/Duration of action(s) and precautions taken	

COMPANIES SHOULD COMPLETE AND SEND SECTION 7 ONLY IN CASE OF A SERIOUS RISK

Section 7: Details of other COMPANY(IES) in the supply chain which hold affected products	
Manufacturer/Importer or Authorised representative: Name/Address/ Tel/Fax/E-mail/Website.	
Distributors/Retailers: Name/Address/ Tel/Fax/E-mail/Website	
Number of products (serial numbers or date codes) held by producer/importer/distributor/retailer/consumers	

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