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(Information)

COUNCIL

COUNCIL RESOLUTION

of 17 December 1998

on operating instructions for technical consumer goods

(98/C 411/01)

THE COUNCIL OF THE EUROPEAN UNION,

Having regard to the Council resolution of 5 April 1993 on the labelling of products in the interest of the consumer ⁽¹⁾,

- (1) Whereas promoting the interests of consumers and ensuring a high level of consumer protection involves, *inter alia*, protecting their health and safety;
- (2) Whereas consumers are entitled to be provided with the information on safety issues which will enable them to assess the risks inherent in a product and to take precautions against those risks;
- (3) Whereas the protection of economic interests requires that consumers of technical goods have access to adequate user information to ensure proper and complete use of the product;
- (4) Whereas inadequate operating instructions may affect the presentation of products and may be a factor to be taken into account together with all other pertinent circumstances in considering whether goods are defective; whereas in this context, experience gained from Council Directive 85/374/EEC of 25 July 1985 on the approximation of the laws, regulations and administrative provisions of the Member States concerning liability for defective products ⁽²⁾ should be taken into account;
- (5) Whereas, in the light of the growing variety of items available on the market and the frequent innovations triggered by technical progress, operating instructions for technical consumer goods are often perceived by consumers as inadequate, both because they are unclear and present language difficulties, owing to faulty translations or to the use of terms which are too complex, and because they lack structure and have inadequate content; whereas the use of the appropriate language is crucial for clear, user-friendly operating instructions;
- (6) Whereas binding provisions of Community law address the problem of operating instructions in areas in which the protection of human health and safety appears particularly relevant, notably medicines, machinery, toys, low voltage equipment, gas appliances and protective equipment, in order to ensure compliance with the relevant essential requirements;
- (7) Whereas no Community legislation addresses the specific aspects of operating instructions for technical consumer goods in general;
- (8) Whereas in a market economy the general need for appropriate operating instructions is in principle to be met by producers and distributors, taking account of demand-side requirements and promoting implementation of best practice through dialogue and cooperation with consumer organisations; whereas consumers may benefit from the development of suitable methods of determining the quality of operating instructions before purchase;

⁽¹⁾ OJ C 110, 20.4.1993, p. 1.

⁽²⁾ OJ L 210, 7.8.1985, p. 29.

- (9) Whereas the provision of accessible operating instructions is closely associated with the 'Design for all' approach, which aims at having mainstream products and services designed to be usable by everyone, including the elderly and the disabled, and is at the core of the current terms of reference of the European Information and Communication Technologies Standards Bodies on 'Standards for disabled and elderly people' ⁽¹⁾; whereas it is also one of the activities being undertaken by the standardisation bodies CEN, Cenelec and ETSI on behalf of the Commission departments responsible for studies and programmes relating to consumer requirements in the field of telecommunications technologies; whereas user-friendly aspects and the total lifespan of a product, from production to recycling, should also be taken into account;
- (10) Whereas general ⁽²⁾ and specific ⁽³⁾ standards for operating instructions are available at international level and, in some instances, at national level;
- (11) Whereas a number of mandates relating to particular consumer concerns which need to be addressed through standardisation have been completed or are in progress, especially in the area of injury prevention, on the basis of framework terms of reference agreed by the Commission in 1995;
- (12) Whereas there is scope for improving the structure, content and usability of operating instructions for

⁽¹⁾ Sogits (Senior officials group on information technology) No 1032.

⁽²⁾ At international level, see ISO/IEC guide No 37, 1995; at national level, see, for example, DIN V 8418.

⁽³⁾ Child safety and standards — general guidelines; ref. No ISO/IEC guide 50, 1987, first edition 15 April.

technical consumer goods in order to facilitate optimum use by the consumer while guaranteeing a high level of safety;

NOTES that, with a view to helping identify the best possible methods and practices, the Commission intends to circulate to the Member States the findings of a survey conducted among national administrations in the European Union and the EFTA countries and the final report of a specialised study on operating instructions carried out by the Austrian authorities;

INVITES the Commission to address the issue of operating instructions for technical consumer goods within the scope of standardisation activities after due consideration of the cost-effectiveness of such activities and to give due attention to this issue in all relevant areas, particularly as regards incorporating consumer needs and furthering consumer representation within the standardisation process;

INVITES the Member States and economic operators:

- to pursue the objective of making information available to consumers, enabling them to make safe, easy, proper and complete use of technical goods, and to take the fullest possible account, where appropriate and in compliance with the Treaty establishing the European Community, of the indications contained in the Annex to this resolution for activities in this field,
- to consider, for example, the possibility of voluntary agreements between manufacturers and consumer associations on the design and content of operating instructions and product labelling and award schemes designed to foster the introduction of state-of-the-art, consumer-friendly operating instructions.

ANNEX

INDICATIONS FOR GOOD OPERATING INSTRUCTIONS FOR TECHNICAL CONSUMER GOODS ⁽¹⁾

Indications as enumerated under the different chapters below are to be considered as non-exhaustive and of an advisory nature:

1. Development of instructions for use

- (a) Guidelines, standards, laws etc. concerning operating instructions are taken into account.
- (b) In order to ensure that information supplied with products is of practical use, usability tests are carried out: in a usability test, the appliance, a list of the tasks to be performed with it and the draft operating instructions are given to a suitable group of consumers who are then observed performing the tasks; observations are reported on standardised record sheets.
- (c) The content is structured on the basis of typical everyday user actions: the content structure of a manual is based on the tasks which will have to be performed by product users (principle of task orientation).
- (d) A user manual provides only information which is not self-evident from the product itself (self-explanatory capacity) or from the user's knowledge and experience or from the characteristics of the task to be performed (principle of supplying the necessary missing information).

2. Content

Operating instructions are set out in a logical sequence reflecting safe and practical use.

Instructions on safety, cautions and warnings, instructions on installation and, finally, instructions on use are clearly separated from each other.

Typical components of such operating instructions are:

- list of product versions covered by the manual, including their distinguishing features,
- table of contents (for lengthy instructions),
- short description of the tasks that the product can perform,
- activity-oriented information for each task, including safety instructions and cautions, such as installation and start-up tips (task 1, task 2, etc.), any general information on safe handling not already included in the tasks, maintenance and care, and troubleshooting sections,
- technical data,
- customer service addresses and hotlines,
- index (for products that perform several tasks or for lengthy instructions),
- detachable quick reference instructions (for products that perform several tasks or tasks consisting of several separate steps),
- list of typical operating errors, their causes and possible solutions,
- information concerning the user-friendliness of the product and how it may be recycled,
- information on the availability of the instructions on media other than printed paper, such as videotape, CD-ROM, worldwide website, etc.

3. Separate operating instructions for different models of the same product

Operating instructions sometimes include information about different models or versions of the same product. It is advisable to have separate instructions for each individual model, particularly when confusion could constitute a safety hazard.

⁽¹⁾ Such as 'white' goods (i.e. kitchen and other household appliances usually covered with white enamel), do-it-yourself appliances, electric and electronic goods for home and portable entertainment, and telecommunication terminal equipment.

However, covering several products in a single manual may be acceptable when differences between product versions do not result in differences between activity steps (for example, when a fax machine has additional features on some models but the basic operations for sending a fax remain the same).

4. Safety instructions and cautions

Instructions, cautions and warnings in matters of safety are prominently displayed at the beginning of the operating instructions and use the pictograms which appear on the product itself. These instructions, cautions and warnings are repeated, if necessary, at the relevant points.

Besides, instructing users in the safe handling of the product is best achieved by linking clearly marked safety instructions and cautions to the sequence of steps in normal use.

Typical operating errors are set out in the sequence in which they may occur.

5. Language of manuals

Consumers have easy access to operating instructions at least in their own official Community language, in such a way that they are legible and easy for the consumer to understand.

For the sake of clarity and user-friendliness, language versions are set out separately from one another.

Translations are based on the original language only and take into account the distinctive cultural characteristics of the area where the relevant language is used; this requires that translations are done by suitably trained experts who share the language of the consumers that the product is aimed at, and that, ideally, they are tested on consumers for comprehension.

6. Communication of information

The communication of information ideally meets the following requirements:

- it is sufficiently clear and precise,
- it is correct in spelling and grammar,
- it uses comprehensible words,
- it uses active verb forms instead of passive forms wherever possible,
- it avoids unnecessary specialist terms,
- it uses everyday expressions,
- it is consistent in the use of words (i.e. the same term should be used throughout to refer to the same object or action),
- it uses typefaces which avoid any confusion between lower case, upper case and figures,
- it explains abbreviations and accompanies them with clear text,
- it ensures that any illustrations used correspond exactly to what the consumer sees, depict only the necessary information and represent only one new item of information per illustration,
- it ensures that any symbols used correspond to commonly used pictograms, are easily recognisable and always have the same meaning,
- when using a combination of text and illustrations, it chooses one of the two as the main medium throughout,
- it does not confine itself to pictures with no text since that does not ensure clarity as pictures alone may not always be sufficiently self-explanatory.

7. Storage of operating instructions for future reference

In order to facilitate home filing and future use, appropriate formats are recommended. Loose leaves are avoided and the layout reflects the order of the information. Fonts are legible for consumers, particularly the elderly.

Highlighting important information, such as safety advice, is useful.
