GPSR Document Suite

Risk Assessment and Management Plan



This document has been prepared for Oathsworn Miniatures by HFG Services

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# Risk Management Plan

## Introduction

This is a risk management plan. It identifies risks and introduces strategies that you can use to reduce or mitigate those risks. It is a part of a set of documents that can be used to demonstrate efforts to comply with the General Product Safety Regulations (EU) if requested. This document is version controlled and will be updated to reflect changes to the GPSR as they occur.

It contains several sections. They are:

1. Analysis of the overall approach
2. Risk Analysis
3. Mitigation Strategies, including
   1. Supply Chain Requirements
   2. Point of sale documentation
   3. Online documentation

# Approach

The general approach adopted in this strategy is one of simplicity and general approaches, rather than drilling into endless detail. These products are inherently not risky, and unlikely to cause serious death or injury. Thus, a light touch to compliance is both reasonable and cost effective.

For this reason, the following advice assumes that all the company product offerings can be grouped into general products, which share similar characteristics and benefit from the same level of compliance.

This ‘big box’ approach can provide a reasonable level of compliance with minimum effort, while still offering good protection for the end user. However, it does require some effort to be expended on preparing safety warning material and making it readily available online.

The approach taken in generating this report was to examine the types of material used in producing products for the wargaming market, then to undertake a risk analysis of those materials, including their potential for use and misuse. Some risks, for example ‘paper cuts’ are so obviously trivial as to be ignored completely in this analysis.

Having analysed the risk, with its likelihood and possible impact, mitigation strategies were developed and documented. These have been condensed in the section following the risk analysis and further extrapolated into practical steps that can be taken during the supply process, at physical point of sale and in delivery of an online presence.

# Risk Analysis

When considering **wargaming materials**, there are several potential risks that we should be aware of. These risks can impact both the safety of the product during its use and its handling during manufacturing, sale, and transport. Below are the primary risks associated with wargaming materials, which can include such materials as:

* Metal alloys,
* Cured resin,
* MDF,
* Paper and Cardboard,
* Hard Plastic (as used in miniature bases or moulded sprues), and
* Soft plastic used for packing.

## Identified Risks and Mitigations

### 1. Choking Hazards (for Small Parts)

* **Risk**: Small parts of miniatures, such as weapons, shields, or accessories, could be a choking hazard, particularly if the miniatures are small enough to be swallowed by children.
* **Risk Likelihood**: Moderate
* **Risk Impact:** Death or serious illness
* **Mitigation**: Ensure that miniatures are appropriately labelled for age restrictions, such as "Not suitable for children under 14 years" or similar warnings. Manufacturers and retailers should check the size of small parts against guidelines on choking hazards.

### 2. Sharp Edges and Points

* **Risk**: Some metal miniatures may have sharp edges or points (e.g., spear tips, swords, or parts of the base) that can cause cuts or puncture wounds if handled carelessly.
* **Risk Likelihood**: Moderate
* **Risk Impact**: Low. Risk of minor injury**.**
* **Mitigation**: Provide clear instructions on how to handle miniatures safely, emphasizing the risk of cuts. Manufacturers should ensure that sharp parts are designed with safety in mind (e.g., avoiding excessively sharp tips) or provide clear labelling on potential hazards.

### 3. Toxicity of Materials (Lead or Other Hazardous Substances)

* **Risk**: Our miniatures are made from an alloy which contains a proportion of lead, which can be hazardous if the miniature is handled improperly.
* **Risk Likelihood**: Low
* **Risk Impact:** Death or serious illness
* **Mitigation**: We will document and emphasise the risks, as well as appropriate safety precautions.
* **Consumer Education**: Advise customers to wash their hands after handling miniatures, especially before eating or touching their face. Instructions should be provided for the safe handling and painting of miniatures.

### 4. Chemical Exposure (Paints and Solvents)

* **Risk**: When painting miniatures, users may expose themselves to harmful **paint fumes, solvents, and chemicals** (e.g., acrylic or enamel paints, thinners, or varnishes) used in the process. These chemicals can cause respiratory problems, skin irritation, or long-term health effects if inhaled or ingested.
* **Risk Likelihood**: Low
* **Risk Impact:** Serious illness
* **Mitigation**: While this is not our risk as such, it is a risk that will be encountered by customers when using our products. We should encourage the use of **non-toxic paints** and **safe solvents**. Provide clear instructions or warnings about ventilation requirements when painting miniatures and handling solvents.

### 5. Inhalation of Dust

* **Risk**: When sanding or filing metal or resin miniatures, as well as MDF; fine dust can be released into the air, which may pose a risk to the lungs if inhaled.
* **Risk Likelihood**: Moderate
* **Risk Impact:** Potential for lung disease.
* **Mitigation**: Advise users to wear **masks** (preferably respirators) and work in well-ventilated areas when sanding or filing. Provide instructions for safe handling and cleaning of miniatures, as well as the use of appropriate safety gear.

### 6. Heavy weight

* **Risk**: Metal miniatures can be **heavier** than plastic miniatures, and if dropped, they may cause injury or damage to surfaces (e.g., breaking fragile items like glass or ceramics).
* **Risk Likelihood**: Very low
* **Risk Impact:** Minor property damage
* **Mitigation**: Provide instructions on how to store and handle miniatures safely to prevent accidental drops. Ensure packaging is sturdy to prevent damage during transportation.

### 7. Potential for Lead Poisoning (especially Older Miniatures)

* **Risk**: Older metal miniatures may contain **lead** (commonly used in alloy casting). Lead exposure can cause serious health issues, particularly for children or pregnant women.
* **Risk Likelihood**: Low
* **Risk Impact:** Serious illness
* **Mitigation**: If selling older miniatures (e.g., second-hand or vintage items), make it clear that they may contain lead and advise consumers to handle them with care, ideally wearing gloves, and to avoid licking or ingesting any paint or dust. For new miniatures, ensure they are **lead-free**.

### 8. Handling of Paint (when painting miniatures)

* **Risk**: When painting miniatures, users may accidentally ingest or inhale **paint** or **paint thinner** if not careful. The **lead-based paints** used in the past can still be a concern for older miniatures or leftover paints.
* **Risk Likelihood**: Very low
* **Risk Impact:** Potential for illness
* **Mitigation**: While this is not our risk as such, it is a risk that will be encountered by customers when using our products. We should provide clear guidance on the use of safe, **non-toxic paints** and painting supplies. Advise users to wear gloves and masks when painting, and to ensure proper ventilation. Paints supplied should be marked with safety labels (e.g., "Non-toxic" or "For adult use only").

### 9. Risks Associated with Small Components and Assembly

* **Risk**: Wargaming miniatures often require assembly, which may involve gluing small parts, using metal pins, or other attachment methods. This process can introduce risks like glue fumes or pin injuries if not handled properly.
* **Risk Likelihood**: Moderate
* **Risk Impact:** Low. Chance of minor injury.
* **Mitigation**: Provide consumers with safety instructions on assembly, including recommendations for using non-toxic glues and handling small components carefully. Include advice on how to avoid injury when attaching metal parts (e.g., using pliers and protective gloves).

### 10. Risks associated with packaging

* **Risk**: Packing material may contain hazardous material, such as plastic bags (choking hazard). Other materials might be toxic if disposed of incorrectly – such as by burning.
* **Risk Likelihood**: Moderate
* **Risk Impact:** Low. Chance of minor injury.
* **Mitigation**: Provide consumers with safety instructions disposal and storage of packing materials. Where possible, use biodegradable or recyclable packaging.

## Mitigation Strategies:

* **Clear Instructions**: Ensure all products are accompanied by clear handling, safety, and usage instructions.
* **Age Recommendations**: Label miniatures with age restrictions, especially if they contain small parts or sharp edges.
* **Non-toxic Materials**: Make sure all miniatures are made from non-toxic materials and lead-free alloys. This may involve a shift in material use from lead alloys to cleaner material such as pewter.
* **Safe Packaging**: Package miniatures securely to avoid damage during transportation, reducing risks from sharp edges or heavy weight.
* **Consumer Education**: Provide educational materials or guidelines on safe handling, painting, and storage of miniatures to reduce risks to customers.

By being aware of these risks and implementing appropriate safety measures, we can help minimize potential hazards for both consumers and manufacturers, ensuring the safe use and enjoyment of metal wargaming miniatures.

## Supply Chain Requirements

The GPSR has specific requirements for your supply chain. The supply chain is best described as the process by which you create products, from sourcing raw materials to shipping out finished products to the retailer or customer.

Most businesses already have processes in place to do all these things, but for clarity, they are:

1. Identify the product, with clear safety and warning labelling
2. Provide manufacturer (and importer information where necessary)
3. Keep Records of your supply chain
4. Retain important safety documents, such as test certificates, safety cards and defect logs.
5. Plan for recalls, and work with authorities and distributors to enact the plan

This last part is important enough to represent a separate document. (See Product Recall Plan.)

In this section we will explore the remainder and identify ways to meet those requirements.

**1. Identification of the Product**

*Requirement*

* Products must bear clear markings to identify them. These include:
  + **Product Type**: Model number or name.
  + **Batch or Serial Number**: To identify specific production lots.
* Clear and legible labelling is mandatory, which must:
  + Withstand the lifespan of the product (e.g., not fade or peel).
  + Be accessible to users without special tools or disassembly.

*Mitigation*

You probably already do this. If your products are custom ordered, or don’t have specific production batches, then you need to treat the order number as a batch number for tracking purposes.

**2. Manufacturer and Importer Information**

*Requirement*

* Products must include:
  + **Manufacturer's Name and Address**: Ensures accountability.
  + **Importer's Name and Address**: For products brought in from outside the jurisdiction.
* This information must be:
  + On the product itself, where feasible.
  + On the packaging or accompanying documentation if not feasible on the product.

*Mitigation*

You probably already do this. Every document is a sales document, including packaging!

**3. Supply Chain Record-Keeping**

*Requirement*

* Businesses must maintain records to trace the product through the supply chain. These records should include:
  + **Suppliers**: Details of the entities from whom the product or its components were purchased.
  + **Distributors and Retailers**: Information on whom the product was sold to.

*Mitigation*

You certainly already do this.

1. **Documentation and Product Tracking**

*Requirement*

* Essential documents include:
  + **Design and Production Records**: Demonstrating safety compliance.
  + **Test Reports and Certificates**: Proving adherence to safety standards.
  + **Recall and Incident Logs**: Documenting any safety issues or product recalls.

*Mitigation*

Make a set of documents with the titles as above. Keep them somewhere safe and update them as necessary.

This doesn’t have to be hard. When you make or order a new batch of product, add a line to the Design & Product Record saying you did it and recording any safety issues… usually “nil.””

Ask your suppliers for test reports on a periodic basis. Even if they don’t or can’t supply one, make sure you record that you asked.

If there’s an incident, fill n the recall and incident log. Use it as your complaints folder, if nothing else.

## Point of Sale

Under the GPSR, several specific requirements pertain to information that must be provided at the **point of sale** to ensure product safety. This includes both physical and online sales. Here's what needs to be announced:

### Mandatory Information at the Point of Sale

The logical extension of customer warnings is to promote awareness of the risk before the customer actually buys the product. This section outlines the measures we will take to help that occur.

#### Labelling

##### Identification of the Manufacturer/Distributor:

As noted above, the product must clearly identify the name, address, and contact details of the manufacturer or the entity responsible for its safety within the EU.

##### Product Identification:

As noted above, information that uniquely identifies the product, such as a model number, batch number, or serial number, must be visible and legible.

##### Safety Information:

As noted above, any warnings or instructions necessary for the safe use of the product must be clearly provided. For example:

* Specific risks (e.g., small parts posing a choking hazard for children).
* Recommended age ranges if relevant (e.g., “Not suitable for children under 36 months”).
* Instructions for safe handling, use, and disposal.

##### Material Composition:

Information about the materials or substances used in the product, particularly if they could pose risks (e.g., specific metals in alloys that users may need to be aware of for allergen or chemical exposure reasons).

##### Digital Information (if applicable):

It may be worth considering using a digital label or QR code to provide safety or compliance information, this must be easily accessible at the point of sale. This should include links to online databases or product pages containing further safety details.

##### Energy Efficiency or Environmental Impact (if applicable):

If your packaging can be easily recycled, then your label should announce this.

## For Online Sales

If you sell products online, GPSR imposes additional requirements:

###### Display of All Mandatory Information:

The same product identification, manufacturer details, and safety instructions must be visible to customers before they make a purchase. You should consider making this a permanent part of your ordering process, requiring customers to accept the risk using a check box before completing the sale.

###### Pictures and Descriptions:

Images and text descriptions must accurately reflect the product’s characteristics, especially any safety warnings. This is obviously a major headache for web retailers. To avoid cluttering up your page, the following approach may be viable:

* Build a page on your website that contains all the safety warnings as linkable sections.
* Use short codes with clickable hyperlinks to avoid major visual impact.

*OR*

* Include the blanket safety warnings in the footer of your site.

###### Access to Documentation:

It is worthwhile to include a page on your website where users can view safety data sheets.

#### Additional Requirements

##### Traceability Information:

Provide any relevant information that enables authorities or customers to trace the product back to its source if necessary. This is covered by:

* Including your name and address details;
* including a section with the details of your EU Representative; and
* having a part, model or order number.

##### Languages:

All information must be provided in the official language(s) of the EU member state where the product is sold. In terms of physical retail, this means wither having multi-lingual packaging or including an information sheet with the relevant languages within the packing. It is important to note that some member states have multiple official languages. For your convenience, a list of member states and their respective languages is appended to this document.

# Summary

This Risk Management Plan identifies and mitigate risks associated with products used in the wargaming market. It aims to ensure compliance with the General Product Safety Regulations (GPSR) in the EU. The plan includes an analysis of the overall approach, risk analysis, and mitigation strategies.

The approach emphasizes simplicity and general strategies, considering the products to be inherently low-risk. The plan outlines various risks such as choking hazards, sharp edges, toxicity of materials, chemical exposure, inhalation of dust, and handling of small components. Each risk is assessed for its likelihood and impact, and corresponding mitigation strategies are provided.

Additionally, the document covers supply chain requirements, including product identification, manufacturer and importer information, record-keeping, and point of sale requirements. It also highlights the importance of clear instructions, age recommendations, non-toxic materials, safe packaging, and consumer education to minimize potential.

The best way to become and stay compliant with the GPSR is to continually consider the importance of providing clear instructions, age recommendations, safe packaging, and consumer education to minimize potential hazards. It’s also worth seriously considering a shift to non-toxic materials, where possible and cost-effective to do so.

## Annex A: List of EU member states along with their official languages:

|  |  |
| --- | --- |
| EU Member State | Official Language(s) |
| Austria | German |
| Belgium | Dutch, French, German |
| Bulgaria | Bulgarian |
| Croatia | Croatian |
| Cyprus | Greek, Turkish |
| Czech Republic | Czech |
| Denmark | Danish |
| Estonia | Estonian |
| Finland | Finnish, Swedish |
| France | French |
| Germany | German |
| Greece | Greek |
| Hungary | Hungarian |
| Ireland | Irish, English |
| Italy | Italian |
| Latvia | Latvian |
| Lithuania | Lithuanian |
| Luxembourg | Luxembourgish, French, German |
| Malta | Maltese, English |
| Netherlands | Dutch |
| Poland | Polish |
| Portugal | Portuguese |
| Romania | Romanian |
| Slovakia | Slovak |
| Slovenia | Slovene |
| Spain | Spanish |
| Sweden | Swedish |

## Annex B: Example wording for safety warning, covering metal, plastic, resin, MDF and paper products.

### General Warning

These products may contain small, sharp pieces that, if swallowed, could be a choking hazard.

If any product, including metal, resin, plastic, wood or paper is eaten seek immediate medical attention.

Care should be taken when handling metal and resin products, to ensure that sharp edges or points do not cause puncture wounds.

You should always wash your hands after handling unpainted products.

If miniature requires assembly ensure a non-toxic glue is used, wear gloves and use pliers to hold pieces while drying.

A mask should be worn when filing any of our products, and the activity should be undertaken in a well-ventilated area to reduce the risk of inhaling dust.

### Material Warnings

Metal products are cast from <<metal alloy>> <<Safety considerations>> Do not lick or ingest the metal.

Resin products are cast from <<material>>. Resin products occasionally may include areas of uncured resin that may cause skin irritation. If there are signs of skin irritation, consult a medical specialist.

Ensure that heavy metal miniatures are not dropped on any surface that they may damage.

MDF products are made from <<material>>. This product conforms <<statement of conformity>>.

MDF and paper products should not be placed on or near a naked flame or heat source as they may combust.

Rare earth magnets are extremely dangerous if ingested. The ingestion of two or more rare earth magnets can cause a potentially fatal blockage of the intestine. If you ingest rare earth magnets emergency medical attention is needed immediately.

### Packaging Warning

Where possible, our products are packaged using recyclable or biodegradable materials. Please dispose of all packaging according to your local authority’s regulations.

Some products are delivered in small plastic bags which might constitute a choking hazard. These bags are not toys and should not be given to small children.