



**SLOVENSKI STANDARD**  
**SIST-TP CEN/TR 15371:2006**  
**01-oktober-2006**

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Safety of toys - Replies to requests for interpretation of EN 71-1, EN 71-2, and EN 71-8

Sicherheit von Spielzeug - Antworten auf Anfragen zur Interpretation von EN 71-1, EN 71-2 und EN 71-8

Sécurité des jouets - Réponses aux demandes d'interprétation de l'EN 71-1, EN 71-2 et EN 71-8

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**ICS:**

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ICS 97.200.50

English Version

## Safety of toys - Replies to requests for interpretation of EN 71-1, EN 71-2, and EN 71-8

Sécurité des jouets - Réponses aux demandes  
d'interprétation de l'EN 71-1, EN 71-2 et EN 71-8

Sicherheit von Spielzeug - Antworten auf Anfragen zur  
Interpretation von EN 71-1, EN 71-2 und EN 71-8

This Technical Report was approved by CEN on 16 April 2006. It has been drawn up by the Technical Committee CEN/TC 52.

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## Foreword

This Technical Report (CEN/TR 15371:2006) has been prepared by Technical Committee CEN/TC 52 “Safety of toys”, the secretariat of which is held by DS.

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## Introduction

### Interpretations and no-action decisions

This Technical Report contains replies to requests for interpretation with regard to the understanding of clauses in EN 71-1, EN 71-2 and EN 71-8. The replies concern those requests which have resulted in an interpretation or the decision that no action is necessary.

An interpretation does not have the same status as the text of the standard, nor can it overrule the text of the standard. However, following an interpretation should give assurance that the relevant clause of the standard has been correctly applied. An interpretation shall only be regarded as a clarification of the meaning of the standard.

#### Disclaimer

**The interpretations have been derived by expert groups of CEN/TC 52. The information contained herein is for guidance only and does not reflect the formal approval by CEN or CEN member bodies. It should be noted that the interpretations are neither part of any standard nor have been referenced in the Official Journal of the European Union.**

### Requests for interpretation

Requests for interpretations may be submitted by a CEN member body through its national committee or by a CEN/TC 52 liaison (but not directly by an individual or a company) - in accordance with the interpretation protocols agreed by CEN/TC 52. The requests are then channelled to the relevant TC 52 working party which will deal with the request.

A request for an interpretation may lead to

- a) *An interpretation of the standard*

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This should reflect a reasonable interpretation of how the standard should be used, taking into account

- the wording of the standard
- the rationale of the standard
- the history of the standard

- b) *A no-action decision*

This is applicable when it is agreed that the standard appropriately specifies how a toy shall be assessed.

- c) *A proposal for an amendment of the standard*

This is applicable when it is agreed that the standard is deficient in some way.

NOTE Interpretation and no-action decisions are published in CEN/TR 15371, which will be updated on a regular basis.

Proposals for amendments will be progressed as new work item proposals in accordance with CEN rules.

### Answers to requests for interpretations

Since requests for interpretations are submitted through a CEN member body, it is assumed that the member body will keep itself informed about decisions concerning the request and its progress and will itself inform the originator of the request as appropriate.

## 1 Scope

The purpose of this CEN Technical Report is to provide replies to requests for interpretations of

EN 71-1:2005, *Safety of toys – Part 1: Mechanical and physical properties* (under publication),  
 EN 71-2:2006, *Safety of toys – Part 2: Flammability*,  
 EN 71-8:2003, *Safety of toys – Part 8: Swings, slides and similar activity toys for indoor and outdoor family domestic use*.

NOTE The clause references to EN 71-1 are to the 2005-edition. If the clause number is different from the 1998-edition, the clause number of EN 71-1:1998 is also indicated.

The clause references to EN 71-2 are to the 2006-edition. If the clause number is different from the 2003-edition, the clause number of EN 71-2:2003 is also indicated.

## 2 EN 71-1:2005 - Safety of toys – Part 1: Mechanical and physical properties

### 2.1 4.5 Glass (no action decision)

Question: 4.5 states that accessible glass may only be used for toys for children over 36 months where it is necessary for the function of the toys (e.g. optical toys, glass light bulbs, glass in experimental sets).

Traditionally there are quite some creativity sets where glass is used, but where it is not clear whether the glass is functional or not.

1. Should we consider the glass used in a candle making set as functional?
2. What about a glass painting set intended to decorate glass objects?

<https://standards.iteh.ai/catalog/standards/sist/32051ec2-c316-42f9-991d-bd12efb3657>



Reply: The nature and use of this product (involving candles) means that EN 71 cannot address the safety. If this product was sold as a toy, it would need to be EC Type examined.

The same may apply to glass painting sets but much would depend on the nature of each product.

REQ 057-05 (AFNOR)

### 2.2 4.14.2 Masks and helmets (no action decision)

Question: 1) The standard EN 71-1:1998 – Safety of toys – Part 1 mechanical and physical properties, in the subclause 4.14.2 states the following about masks:

“4.14.2 *Masks and helmets*

Mask and helmets shall conform to the following requirements:

a) Masks and helmets that fully enclose the head and which are made of impermeable material shall provide a total ventilation area of 1300 mm<sup>2</sup> minimum through at least two holes at least 150 mm apart or through any equivalent single ventilation area.”

We understand reading this point that the requirements are for application to all types of masks.

Nevertheless, there are several types of masks in the market according to their design and their material:

- a) Masks that fully enclose the head (generally the area of the face with polymeric flexible material and the rest with textile material with or without hair.)
- b) Masks that enclose the head but not fully (generally the area of the face with polymeric flexible material and the rest with textile material with or without hair).
- c) Masks that only enclose the face.

The last ones have several designs, some fit in the form of the face and others are more or less flat and are made of flexible material, polymeric half-rigid material and even cardboard.

Taking into account that establishing the safety requirements to address risks is the target of the standard (in this specific case, the risk of asphyxia that could happen to the children when using the masks), we have a doubt regarding the last type of masks (mask c)), which enclose only the face, because it is likely that not all the mentioned masks could present the risk of asphyxia.

Therefore, there could be type c) masks that could not need to fulfil the requirements on 4.14.2 a)

Examples of type c) masks:





2) Regarding the ventilation area required, we have a doubt about what has to be included in the mentioned area, i.e. does the ventilation area only include the holes at the level of the nose and the mouth, or include the holes at the level of the eyes too?

Reply: 1) Requirements in clause 4.14.2 a) only apply to masks that fully enclose the head and which are made of impermeable material therefore masks that cover the face and for which pictures are given are not covered by this requirement.

2) All holes are to be taken into consideration whatever their position knowing that if only eye, nose and mouth holes were considered the 150 mm requirement would conflict with the normal positioning of those holes for a correct use and should never be fulfilled.

REQ 048-04 (AENOR)

## 2.3 4.15.1.4 Stability (interpretation)

(4.15.1.3 in EN 71-1:1998)

Question: Is the lateral stability test applicable to a two wheels toy motorbike intended for children over 3 years of age, for which removable stabilizers are provided, considering that the toy can be operated by the child when stabilizers are removed?

Interpretation: This toy shall be considered as a toy where the feet of the child can provide sideways stability and is therefore excluded from the 4.15.1.3 requirements.

REQ 046-04 (AENOR) – I EN 71-1 010

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## 2.4 4.15.1.6 c) Transmission and wheel arrangement (no action decision)

(4.15.1.5 c) in EN 71-1:1998)

Question: During testing of a battery operated ride on car (shown below) it was noted that there was a gap of approximately 6 mm between a wheel and the adjacent motor housing (see illustration).

It is clear from 4.15.1.5 c) of EN 71-1 that the product fails:

*Text of Standard*

*c) Spaces between the wheels and the body or parts of the body (e.g. mudguards) shall, if they allow a 5 mm diameter rod to be inserted, also allow a 12 mm diameter rod to be inserted.*

Is this an accurate understanding of the standard?