



SLOVENSKI STANDARD
SIST-TP CEN/TR 15371:2009

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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

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

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

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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 13 November 2008. It has been drawn up by the Technical Committee CEN/TC 52.

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Foreword

This document (CEN/TR 15371:2008) has been prepared by Technical Committee CEN/TC 52 "Safety of toys", the secretariat of which is held by DS.

This document supersedes CEN/TR 15371:2006.

Introduction

Interpretations and no-action decisions

This Technical Report contains replies to requests for interpretations concerning the understanding of clauses in EN 71-1:2005, EN 71-2:2006 and EN 71-8:2003. The replies concern those requests that have resulted in an interpretation or a decision that no action is required as the standard is sufficiently clear.

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 should only be regarded as a clarification of the meaning of the standard.

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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.

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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 then deal with the request.

A request for an interpretation may lead to

a) *An interpretation of the standard*

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.

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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 (including amendments A1, A3, A4, A5 and A6:2008)*

EN 71-2:2006, *Safety of toys – Part 2: Flammability (including amendment A1:2007)*

EN 71-8:2003, *Safety of toys – Part 8: Swings, slides and similar activity toys for indoor and outdoor family domestic use (including amendment A1:2006)*

2 EN 71-1:2005 - Safety of toys – Part 1: Mechanical and physical properties (including amendments A1, A3, A4, A5 and A6:2008)**2.1 3.30 and 3.31 Projectile toys (no action decision)****Question**

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EN 71-1 has the below definitions of projectiles with or without stored energy:

3.30**projectile toy with stored energy**

toy with a projectile propelled by means of a discharge mechanism capable of storing and releasing energy

3.31**projectile toy without stored energy**

toy with a projectile discharged by the energy imparted by a child

An example - a toy where the energy is imparted by e.g. a spring or an elastic band and the launching is entirely controlled by the child, as the toy has no mechanism for holding back the projectile and storing the energy for a prolonged time. Such a toy could be interpreted not to be included in 3.31. However, the toy is obviously also not within 3.30 because we interpret 3.30 so that the toy must be capable to accumulate and store the energy for a prolonged period of time without involvement of a child.

We would like to have a confirmation that a projectile toy, which cannot accumulate and store energy is within 3.31 even if a spring is used in launching the projectile.

We suggest rewording 3.31 to make this clear.



Reply

Standard is clear. In this case, the energy is not stored and released by a discharge mechanism but the energy is imparted by the user. In consequence, this toy is regarded as a "projectile toy without stored energy"

REQ 064-06 (DS, Denmark)

2.2 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 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 candle making set as functional?
<https://standards.itech.ai/catalog/standards/sist/deadcfa4-622c-4ed8-bcf8-9f11e99d733e/15371-2009-15371-2009-15371-2009>
- 2 What about a glass painting set intended to decorate glass objects?



Reply

The nature and use of this product (involving candles) means that EN 71-1 cannot address the safety. If this product were 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, France)

2.3 4.14.2 Masks and helmets (no action decision)

Question

- 1) Subclause 4.14.2 of EN 71-1 states about masks the following:

CEN/TR 15371:2009 (E)*“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 mm² 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 requirement apply to all types of masks.

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

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). 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).

Masks that only enclose the face.

The last ones have several designs, ones 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 below type of masks, which enclose only the face, because it is likely that not all the mentioned masks could present the risk of asphyxia.

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Therefore, there could be masks like the below ones that could not need to fulfil the requirements on 4.14.2 a)



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 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 been fulfilled.

REQ 048-04 (AENOR, Spain)

2.4 4.15.1.4 Stability (interpretation)

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 toy where the feet of the child can provide sideways stability and therefore excluded from the 4.15.1.4 requirements.

REQ 046-04 (AENOR, Spain)

2.5 4.15.1.4; 8.23.1 Stability (interpretation)

Question (UNI, Italy)

EN 71-1 requires, for the stability test, to "load the toy in the most onerous position with a mass [...] on its standing or sitting surface".

Our interpretation of this requirement is "Load the toy in the most onerous position on the standing or sitting surface, in such a way the mass is perpendicular to the standing or sitting surface and that the vertical projection of the base of the test mass is fully enclosed in the sitting surface. If the standing or sitting surface is narrower than the test mass, the centre of the test mass shall be positioned along the axis of the seat."

Applying this interpretation, a correct position to place the test mass for the front stability is shown in the following pictures (please, do not consider the position of the toy on the inclined plane, it is just an example).

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If we do not apply this interpretation every laboratory can try to find any improbable sitting surface like in the following examples:



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We consider that all the above examples represent a not correct way to perform the test: in the first row example, the mass is not perpendicular to the sitting surface, in the second and in the third rows, the mass base is outside the sitting surface.

In the third row, someone can argue that the ring allows the placing of the mass without any external support, but if we consider applying this interpretation, we will again have problems. Actually, EN 71-1 Figure 21 does not define the sides of the test mass. Since the test mass does not need to be a perfect cylinder, also the test mass for the dynamic test defined in Figure 23 may be used. Since the position of the test mass on ride on toys with armrest may be significantly influenced (if we agree with this interpretation) by the sides of the test mass, we will have for sure different test results, depending on the kind of the test mass used.

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We can also have even more improbable test conditions like the following:



According to our opinion, the correct interpretation is "load the toy in the most onerous position on the standing or sitting surface, in such a way the mass is perpendicular to the standing or sitting surface and that the vertical projection of the base of the test mass is fully enclosed in the sitting surface. If the standing or

sitting surface is narrower than the test mass, the centre of the test mass shall be positioned along the axis of the seat". Thus between the two positions shown in the following examples, in case we are considering the frontal stability, it is the second (the one with the test mass with its base in contact with the front edge of the seat) to be considered as the most onerous condition (in the other one, the test mass is just centred on the seat, and thus this is not the most onerous position). Nevertheless, allowing laboratories to place the mass with its base outside the sitting surface would lead to have no more repeatable tests.



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We also consider that a stability test for ride on toys with child rings or armrests should be developed, like the test method to test ride on toys with backrest, which is currently being developed by TG 6 (We suggest that for armrest, the test mass should be further decreased to 9 kg).

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Question (BSI, United Kingdom)

The clause states "Load the toy in the most onerous position" Can this be clarified as to whether the weight/mass is loaded in the most onerous position or the toy is placed in the most onerous position with the test mass located in the "normal" position of use?

Comments/proposal for an answer: Believed that the test mass should be placed on the seat (or standing position) to the extremity of the seat, but within the confines of the seat, i.e. not overhanging the seat.

Also, the test mass should remain perpendicular to the plane of the seat, when placed on the 10° slope.

Interpretation

Before placing the toy on the slope, the mass shall be placed on the sitting or standing surface so that the main axis of the mass remains as close as vertical as possible without any additional support between the mass and the sitting or standing surface. If the sitting or standing surface is larger than the base of the test mass, the test shall be performed placing the mass on the sitting or standing surface in the most onerous position(s) with regards to stability and shall remain within the sitting or standing surface. It is allowed to use e.g. tape, straps, etc. to maintain the mass in position when the toy is placed on the slope.

REQ 070-06 (UNI, Italy); REQ 074-07 (BSI, United Kingdom)