



**SLOVENSKI STANDARD**  
**SIST-TP CEN/TR 16411:2012**  
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**Izdelki za otroke - Leta 2012 zbrane interpretacije in razlaga standardov CEN/TC 252**

Child use and care articles - 2012 compiled interpretations of CEN/TC 252 standards

Artikel für Säuglinge und Kleinkinder - Gesammelte Interpretationen der CEN/TC 252-Normen 2012

Articles de puériculture - Compilation des interprétations des normes du CEN/TC 252 en 2012

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TECHNICAL REPORT  
RAPPORT TECHNIQUE  
TECHNISCHER BERICHT

**CEN/TR 16411**

September 2012

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ICS 97.190

English Version

## Child use and care articles - 2012 compiled interpretations of CEN/TC 252 standards

Articles de puériculture - Compilation des interprétations  
des normes du CEN/TC 252 en 2012

Artikel für Säuglinge und Kleinkinder - Gesammelte  
Interpretationen der CEN/TC 252-Normen 2012

This Technical Report was approved by CEN on 6 August 2012. It has been drawn up by the Technical Committee CEN/TC 252.

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## Foreword

This document (CEN/TR 16411:2012) has been prepared by Technical Committee CEN/TC 252 “Child use and care articles”, the secretariat of which is held by AFNOR.

## Introduction

Interpretations and no-action decisions

This Technical Report contains replies to requests for interpretation and clarifications with regard to the understanding of clauses in the standards elaborated within the CEN/TC 252. 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 and clarifications have been derived by expert groups of CEN/TC 252. 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 252 liaison (but not directly by an individual or a company) - in accordance with the interpretation protocols agreed by CEN/TC 252. The requests are then channelled to the relevant CEN/TC 252 working group which will 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 child care article shall be assessed.

**CEN/TR 16411:2012 (E)**

- 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 16411, 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.

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## 1 Scope

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

- EN 1888:2003, Child care articles - Wheeled child conveyances - Safety requirements and test methods
- EN 1888:2003/A1:2005, Child care articles - Wheeled child conveyances - Safety requirements and test methods
- EN 1888:2003/A2:2005, Child care articles - Wheeled child conveyances - Safety requirements and test methods
- EN 1888:2003/A3:2005, Child care articles - Wheeled child conveyances - Safety requirements and test methods
- EN 12586:2007, Child use and care articles – Soother holder – Safety requirements and methods
- EN 12790:2009, Child use and care articles - Reclined cradles
- EN 12221-1:2008, Child use and care articles - Changing units for domestic use – Part 1: Safety requirements
- EN 12221-2:2008, Child use and care articles - Changing units for domestic use - Part 2: Test methods
- EN 1466:2004+A1:2007, Child use and care articles - Carry cots and stands — Safety requirements and test methods

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**2 00252009 – EN 1888:2003, Child care articles - Wheeled child conveyances - Safety requirements and test methods**

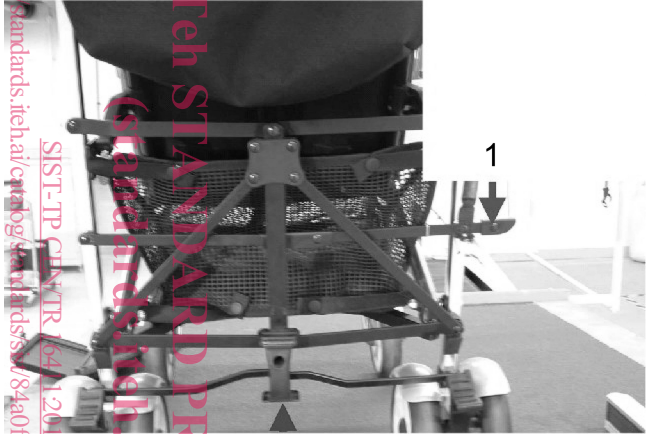
**Table 1 — Summary table of the request for interpretations classified in the order of the clauses/subclauses of the EN 1888:2003**

Clause/Subclause	Title	Interpretation n°
6.1.5	Attachment of mechanical parts	6
6.1.7	Pram body or seat unit internal lining	4
11	Locking devices for the folding mechanism	2
11.2	Test for locking devices	1
18	Dynamic strength	3
21.1	General (Product information)	5

**Table 2 — Interpretations**

N°	Clause/ Subclause/ Annex	Paragraph/ Figure/ Table/Note	Question	Reply
1	11.2		<p>After performing some comparative tests in different laboratories on the same item (a stroller), we found that test method for test 11.2 is not completely defined in EN 1888:2003; as a matter of fact, different methods applied by different laboratories lead to completely different results (failure or approval). In particular, the sentence "Restrain the vehicle without impeding its folding" can be interpreted in different ways, leading to these extreme testing situations:</p> <ul style="list-style-type: none"> <li>— put the stroller with the front wheels against some stops and restrain the vehicle to avoid its tipping over, for example by attaching a cord under the stroller to fix it to the floor. Pull then the handle with a force of 200N. In case of separate</li> </ul>	



N°	Clause/ Subclause/ Annex	Paragraph/ Figure/ Table/Note	Question	Reply
			handles pull each handle separately with 200N.	
1	11.2		<p>— put the stroller on the floor without stopping the front wheels and restrain the vehicle to avoid its movement and tipping over by fixing one of the rear wheels to the floor. Pull then the handle with a force of 200N. In case of separate handles pull each handle separately with 200N.</p> <p>The two test methods distribute the force on the frame of the stroller in a very different way and this may lead to different results for the “same” test. It is necessary to amend the current test method in order to clearly define the testing conditions in such a way that every laboratory will get the same results when testing the same item with the same method.</p>	<p>This test is supposed to assess the strength of the locking devices during use. Therefore "without impeding its folding" means that during test, the vehicle is still able to absorb the force applied.</p> <p>The requirement of subclause 11.1 ("when tested in accordance with 11.2, any subsequent folding travel shall comply with the requirements of 6.1.1, 6.1.2 and 6.1.3. The vehicle shall not fold and the locking device(s) shall not be released") shall be checked after the force has been applied and the product being erected for use again (all locking devices locked), in order to control if any effect such as strain may create entrapment hazards, crushing hazards, and dangerous edges or corners due to failure of any locking device.</p>
2	11		 <p><b>Key</b></p> <p>1 Push up to unlock with left foot</p> <p>2 Push down with right foot, to release and enable folding</p>	<p>a) NO, it is not the intention of the committee to fail this kind of product.</p> <p>b) Development</p> <p>Locking devices are required to prevent a vehicle folding whilst a child is in the vehicle, and also during the process of the child being put in and taken out of the vehicle. Any locking device(s) for the folding mechanism shall be positioned so that it is not possible to operate more than one device in a single action.</p> <p>To avoid the hazards due to inadvertent operation by the adult or operations by a child, there shall be at least two locking devices, to be released, one of them shall require:</p> <ol style="list-style-type: none"> <li>1) two separate operations acting on two separate parts of the vehicle; or</li> <li>2) two consecutive actions, the first being maintained while the second is carried out.</li> </ol> <p>To avoid the hazards due to incomplete</p>

N°	Clause/ Subclause/ Annex	Paragraph/ Figure/ Table/Note	Question	Reply
			<p><b>Figure 1 — Stroller with a standard folding lock</b></p> <p>Illustrated above is a picture of a stroller with a standard folding lock arrangement of a type that has been supplied for many years, without adverse safety comments.</p>	<p>deployment at least one of the locking devices shall engage automatically.</p> <p>c) Proposal for interpretation</p> <p>Release: if (when the product is fully erected and ready for use) any of the locking devices considered has to be maintained operated, it shall not be considered as being released.</p>
			<p>The design of the folding mechanism lock complies with the requirements of the UK standard BS 7409: 1996. A UK test laboratory has failed folding mechanisms of this type to EN 1888:2003 clause 11 (Locking devices for the folding mechanism), in their opinion neither one of the 2 locking devices satisfies 11.1a) or b).</p> <p>As mentioned strollers with this type locking device have been supplied in large quantities by many different manufacturers for more that a decade without any adverse reports of inadvertent operation of the locking devices etc.</p> <p>Is it the intention of the committee that this type of design should fail EN 1888?</p>	<p>In that case check if the system complies with b), considering that the second operation or action may be operated on the second device.</p> <p><input checked="" type="checkbox"/> Clause 11 of the consolidated version of EN 1888 shall be amended.</p>
3	18		<p>After test in accordance with 18.2, the vehicle shall not be damaged such as its safety is impaired. .This is verified following order of tests given in clause 4.2.</p> <p>The prambody or seat unit shall not be displaced by more than 10 mm on the chassis after testing in accordance with 18.2 in every direction.</p> <p>Lets consider a carrycot attached to a pushchair by the mean of straps fitted with clips. requirements of clause 14 being met.</p> <p>NOTE Carrycots fitted on a pushchair are considered as seat units in accordance with the definition given in clause 3.3.</p> <p>a) What is the rationale of the requirement 18.1 (no displacement greater than 10 mm) ?</p> <p>b) Is this requirement applicable to soft carrycots?</p>	<p>a) The aim of the requirement is to check the strength of the attachment devices for the seat unit or pram body to the chassis.</p> <p>b) Soft carry cots attached to the chassis shall comply with this requirement.</p> <p><input checked="" type="checkbox"/> Risks linked to the use of soft carry cots fitted to a pram body or seat unit shall be addressed by revision of EN1888.</p>

N°	Clause/ Subclause/ Annex	Paragraph/ Figure/ Table/Note	Question	Reply
4	6.1.7		<p>We need clarification on the meaning of tension of internal lining of the pram body or seat unit.</p> <p>Which risk should be covered?</p>	<p>The risk to be covered is the risk of suffocation due to loose fabric parts.</p> <p>The standard is clear enough to cover the risk.</p>
5	21.1		<p>Product information – General : the standard precises: "The warning sentences shall be written in letters at least 10 points in height. The word "WARNING" shall be written in upper case."</p> <p>a) What is the measurement to assess this requirement? b) Are all letters concerned?</p>	<p>An European standard, the CEI/TR 62017-1:2001 dealing with product information gives details.</p> <p>A typographic ruler (normograph) can be used to directly check that the height of letters is 10 points.</p> <p>☒ The wording will be changed in the revision of the standard to be in line with CEN/CENELEC Guidelines 11.</p>
6	6.1.5		<p>We need precision on the type of parts for which this clause applies and how.</p> <p>As the 90 N force corresponds to the force that a child is able to apply on parts and in line with relevant risk analysis we decide to apply this requirement within the access zone, as described within previous clauses of the standard.</p>	<p>The proposal is not an interpretation, but changes the standard..</p> <p>This clause is applicable to the whole product.</p> <p>☒ Wording will be improved during the revision work.</p>

### 3 00252039 – EN 1888:2003/A1:2005, Child care articles - Wheeled child conveyances - Safety requirements and test methods

Table 3 — Summary table of the request for interpretations classified in the order of the clauses/subclauses of the EN 1888:2003/A1:2005

Clause/Subclause	Title	Interpretation n°
15.1.2	Harness anchorage points	1

Table 4 — Interpretations

N°	Clause/ Subclause/ Annex	Paragraph/ Figure/ Table/Note	Question	Reply
1	15.1.2		<p>The amendment A1 requires in subclause 15.1.2:</p> <p>"Seat units and pram bodies with an internal length greater than 800 mm (see 6.2.1) shall be fitted with two harness anchorage points for each position that a child can occupy"</p> <p>As a seat unit shall be equipped with a child restraint system conforming to the requirements of the standard and its amendment, shall we ask for additional anchoring points ?</p> <p>What does "for each position that a child can occupy" mean ?</p>	<p>The 800 mm internal length refers to prambodies.</p> <p>The aim of these attachment points is to allow a carer to use a separate harness.</p> <p>Even a seat unit fitted with a child restraint system shall be fitted with two anchorage points.</p>

### 4 00252040 – EN 1888:2003/A2:2005, Child care articles - Wheeled child conveyances - Safety requirements and test methods

Table 5 — Summary table of the request for interpretations classified in the order of the clauses/subclauses of the EN 1888:2003/A2:2005

Clause/Subclause	Title	Interpretation n°
4.5.2.8	Test mass F	1

Table 6 — Interpretations

N°	Clause/ Subclause/ Annex	Paragraph/ Figure/ Table/Note	Question	Reply
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	Subclause/ Annex	Figure/ Table/Note		
1	4.5.2.8		<p>The amendment A2 requires in subclause 4.5.2.8 a test mass F, initially designed to be used for tests of combinations pushchair / group 0+ car seat.</p> <p>The use of this test mass has not been described in some clauses for relevant tests. As the limit of use of such products is 13 kg in weight, is it possible to use this test mass F where it is relevant? (i.e. stability, parking device as irregular surface tests ...)</p>	<p>The standard as it is cannot be changed and until the revision the 15 kg test mass shall be used.</p> <p>☒ This shall be addressed during a revision.</p>

## 5 00252041 – EN 1888:2003/A3:2005, Child care articles - Wheeled child conveyances - Safety requirements and test methods

Table 7 — Summary table of the request for interpretations classified in the order of the clauses/subclauses of the EN 1888:2003/A3:2005

Clause/Subclause	Title	Interpretation n°
6.1.8	Attachment of textile parts with child retention purpose	1

Table 8 — Interpretations

N°	Clause/ Subclause/ Annex	Paragraph/ Figure/ Table/Note	Question	Reply
1	6.1.8		<p>As it is written, the text may be applicable to any existing product, as soon as a textile part is provided, where it gives the impression that a retention purpose is met.</p> <ul style="list-style-type: none"> <li>— This wording shall be clarified and improved.</li> <li>— It shall be clearly determined, when the test is applicable.</li> </ul>	<p>This requirement is only applicable to seat units convertible into a prambody by adding textile parts and which are not equipped with a restraint system adjustable to the child's size from birth and complying with clause 15.</p>