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Oprema otroških igrišč - Odgovori na zahteve za interpretacijo EN 1176:2008 in njegovih delov

Playground equipment for children - Replies to requests for interpretations to EN 1176:2008 and its parts

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**Playground equipment for children - Replies to requests for
interpretation of EN 1176:2008 and its parts**

Alle beschlossenen Interpretationen und Antworten
Spielplatzgeräte für Kinder betreffend

This draft Technical Report is submitted to CEN members for Technical Committee Approval. It has been drawn up by the Technical Committee CEN/TC 136.

CEN members are the national standards bodies of Austria, Belgium, Bulgaria, Croatia, Cyprus, Czech Republic, Denmark, Estonia, Finland, France, Germany, Greece, Hungary, Iceland, Ireland, Italy, Latvia, Lithuania, Luxembourg, Malta, Netherlands, Norway, Poland, Portugal, Romania, Slovakia, Slovenia, Spain, Sweden, Switzerland, Turkey and United Kingdom.

Recipients of this draft are invited to submit, with their comments, notification of any relevant patent rights of which they are aware and to provide supporting documentation.

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EUROPEAN COMMITTEE FOR STANDARDIZATION
COMITÉ EUROPÉEN DE NORMALISATION
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Foreword

This document (FprCEN/TR 16396:2012) has been prepared by Technical Committee CEN/TC 136 “Sports, playground and other recreational facilities and equipment”, the secretariat of which is held by DIN.

This document is currently submitted to the Technical Committee Approval.

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Introduction

Interpretations and no-action decisions

This Technical Report contains replies to requests for interpretations concerning the understanding of clauses in EN 1176:2008 and its parts. 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. However, following an interpretation gives assurance that the relevant clause of the standard has been correctly applied. An interpretation is a clarification of the meaning of the standard.

Disclaimer

The interpretations have been derived by expert groups of CEN/TC 136/SC 1 and have been circulated to National Standards Bodies for approval. The information contained herein does not reflect the full 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 interpretations may be submitted by a CEN member body through its national committee or by a CEN/TC 136 liaison (but not directly by an individual or a company) – in accordance with the interpretation protocols agreed by CEN/TC 136/SC 1. The requests are then channelled to the CEN/TC 136/SC 1 interpretation panel, which will then deal with the request.

A request for an interpretation may lead to

a) An interpretation of the standard with no-action to the standard (no revision and no amendment)

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

- 1) the wording of the standard
- 2) the rationale of the standard
- 3) the history of the standard

This is also applicable when it is agreed that the standard appropriately specifies how playground equipment shall be assessed.

b) 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 xxxxx, which will be updated on a regular basis

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

c) a future revision

This is applicable when the standard is not clear and a suitable amendment can not be found to fully clarify the question. Further work is needed on existing requirements or new requirements may need to be drafted.

Proposals for a revision will be progressed as a new work item proposal 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.

The following information requests have been included in this Technical Report:

2009

2009-01 DS - Part 4 - 4.5
 2009-02 DS - Part 10 - 4.3.7
 2009-03 DS - Part 10 - 4.4.2.4
 2009-04 AFNOR - Part 1 - 4.2.8.1 table 2
 2009-05 AFNOR - Part 1 - 4.2.8.1 figure 14
 2009-06 DS - Part 1 - 4.2.8.4
 2009-07 DS - Part 6 - 4.6
 2009-08 DS - Part 6 - 4.10
 2009-09 SN - Part 1 - 4.2.7.2 a) and b) and Annex D

2010

2010-01 SFS - Part 1 - 4.2.4.4
 2010-02 SFS - Part 1 - 3.5
 2010-03 SFS - Part 1 - 4.2.8.5.3
 2010-04 SFS - Part 1 - Scope
 2010-05 DS - Part 2 - 4.10.1
 2010-06 DS - Part 2 - 4.2
 2010-07 DIN - Part 1 - 4.2.8.5.2
 2010-08 CEN/TC 136/SC 1/TG 1 - Part 6 - Table 1
 2010-09 SII - Part 1 general

2011

2011-01 ASI - Part 11 - scope, signage
 2011-02 TSI - Part 1 - 4.2
 2011-03 SNV - Part 1 - 4.2.7.3
 2011-04 SNV - Part 1 - 4.2.4; 4.2.4.4 - *still being confirmed*
 2011-05 SIS - Part 3 - 4.2
 2011-06 DS - Part 2 - Annex B

NOTE

ASI – Austria, DS – Denmark, SFS – Finland, AFNOR – France, DIN – Germany, SII – Israel, SIS – Sweden, SN – Switzerland, TSI – Turkey,

1 Scope

The purpose of this CEN Technical Report is to provide replies to requests for interpretations of all parts to EN 1176.

2 EN 1176-1:1998, Playground equipment — Part 1: General safety requirements and test method

2.1 General (interpretation request 2010-09 – SII)

Question

- 1 Would appreciate and it is very important to get formal answer from the TC136 /WG in relation to how to test the "rope carousel" an explanation for the rationale for testing them only to EN 1176-1 and not with EN 1176-5?
- 2 During that period our w/g discuss on the EN 1176-1:2008 standards, so they have few questions-
 - A) obtain their position regarding the criteria for fire resistance of playground equipment placed mainly in open areas;
 - B) obtain from them an explanation why the instructions for tests of playground equipment in accordance with EN 1021 have been deleted;
 - C) why are there not clear instructions besides the regulations of the countries where the equipment is assembled?
- 3 We are also involved with musical playground equipment (see attached photographs). Would the requirements of EN 1176 be applicable to some of them? Which types would be covered by EN 1176 and which would not? Is there any restriction to placing them in an area together with other playground equipment?

Reply

No action/interpretation

1. A picture of the specific product would be required to make a formal judgement.

EN 1176-1, clause 4.2.1 confirms; 'Equipment where the primary play function is augmented by a secondary motion, e.g. rocking and/or rotating, shall conform to the additional parts of EN 1176 relating to both play functions, as appropriate, unless the equipment is specifically covered in just one of the additional parts of EN 1176.'

EN 1176-5, scope confirms; 'This document is not applicable to equipment where the main play function is not rotating'.

2. A) Contained Playground Equipment has the greatest risk and these requirements are now covered in the new EN 1176-10. Other than this the greatest risk is from materials that produce a surface flash effect and would not give time for users to leave the area.
- B) EN 1021 was no longer thought to be necessary as a general requirement, but is still referred to in EN 1176-10.
- C) All countries have different National Regulations, from which no universal requirements could be identified.

3. There are no specific requirements in EN 1176 for 'Musical' Playground Equipment. However EN 1176-1 provides a basis for assessing all types of Playground Equipment. The judgement of when and how much of this specification to apply not only relates to the type of product, but also to where it is provided. In an unsupervised/free access situation, together with other Playground Equipment items, then some assessment to EN 1176 may be helpful.

Comments:

Question 1: Future work required to determine what is relevant for this specific type of product. This would need to be determined by risk assessment.

Questions 2 & 3: No further action required.

2.2 Scope (interpretation request 2010-04 SFS)

Question

Question 1: How high should the fence be, if it is used as sole means of separating the playground from the exercise area?

Question 2: If distance alone is used as means of separating the playground from the exercise area, how long should this distance be?

Question 3: Can you give any other example on what other means of separating these areas there could be?

Reply

No action/interpretation

The interpretation panel recommend work is started, as a priority, for exercise equipment of this type as it is now being specified in most European countries, in association with children's playground equipment.

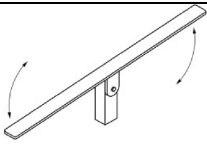
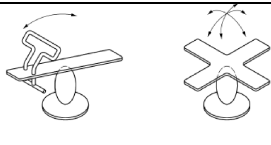
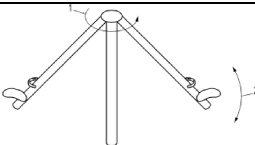
The panel advises that when products of this type are installed in association with children's playground equipment it will get use by children, whether intentional or not, as segregating by fencing, for example, does not work as a solution. Therefore this type of equipment should be designed and provided without unacceptable risks to these children, and comply with relevant requirements in EN 1176, e.g. according to test protocols from accredited test houses, until a new standard is developed.

2.3 3.5 (interpretation request 2010-02 SFS)

Question

Clause 3.5 tells that forced movement is "e.g. sliding, swinging, rocking". Different rocking equipment provide different types of movement. This is expressed in the table below:

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	Type 1 and 6	Type 2-4	Type 5
Product example			
Movement type	Up-down	Slow and short horizontal movement	Rotation with vertical movement
Length of movement	60 - 130 cm	20 - 40 cm	infinite
Movement speed	Free fall down is possible	Slow	Potentially fast

It's obvious that there is a distinction between different "rocking" movements.

Question 1: Are type 2 – 4 rocking equipment intended to require free space like in clause 3.5?

Clause 4.2.8.2.5, 3rd paragraph: "In most cases there may be overlapping of falling spaces including impact areas. Unless specified in other parts of this standard, overlapping of the *falling space where forced movement exists should not occur.*"

Question 2: Are type 2 – 4 rocking equipment intended to be installed without overlapping falling space like in clause 4.2.8.2.5?

Reply

No action/interpretation

Answer to the question 1)

The definition for Free Space in EN 1176-1:2008 point 3.5 refers to 'Rocking Equipment'.

Also, in 4.2.8.5.2, 1st paragraph there is a clear reference to rocking equipment as having forced movement (thus free space).

As no exceptions are given in EN 1176-6 it applies to all types of rocking items.

Additionally during the 2008 revision; changes were made to the requirements for a tested surface to be provided. Part of these discussions assumed that small rocking items, such as type 2a, had a forced movement/free space to ensure they were required to have an impact attenuating surface in accordance with EN 1176-1.

Answer to the question 2)

Yes, types 2 – 4 rocking equipment are intended to be installed without overlapping falling space according to EN1176-1 clause 4.2.8.2.5, 3rd paragraph, as there is no exception in part 6.

However, please also see EN 1176-6, clause 4.10; This allows the Falling Space for rocking equipment types 1, 2, 3 and 4, to be reduced to a minimum of 1m, from the general requirements in EN 1176-1

Comments:

Risks associated with a closer separation/proximity of single-user rockers, such as type 2a, are much less than for multiuser types as that single user has a far higher level of control. A closer separation distance for Rocking Equipment, of this type, could be considered, as an exemption, as future work. This would need to be carefully considered to the existing requirements of EN 1176-1, clauses 4.2.8.2.

We would recommend that specific types of Rocking Equipment complying with EN 1176-6 should be exempt from the restriction in EN 1176-1, not to overlap Falling Spaces. (Should be confirmed by risk assessment). This would still enforce that they include some forced movement, but acknowledges it to be of a small, lower risk, amplitude.

2.4 4.2 (interpretation request 2011-02 TSI)**Question**

Is the product seen in the photos suitable for Subclause 4.2 of EN 1176-1?

