



SLOVENSKI STANDARD
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Izdelki za otroke - Leta 2013 zbrane interpretacije in razlaga standardov CEN/TC 252

Child use and care articles - 2013 compiled interpretations of CEN/TC 252 standards

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Articles de puériculture - Compilation des interprétations des normes du CEN/TC 252 en 2013

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Child use and care articles - 2013 compiled interpretations of CEN/TC 252 standards

Articles de puériculture - Compilation des interprétations
des normes du CEN/TC 252 en 2013

This draft Technical Report is submitted to CEN members for Technical Committee Approval. It has been drawn up by the Technical Committee CEN/TC 252.

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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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FprCEN/TR 16411:2013 (E)

Foreword

This document (FprCEN/TR 16411:2013) has been prepared by Technical Committee CEN/TC 252 "Child use and care articles", the secretariat of which is held by AFNOR.

This document is currently submitted to the Technical Committee Approval.

This document will supersede CEN/TR 16411:2012.

New interpretations have been added into this revised document:

Standard	Title	Subject
EN 14350-2:2004	Drinking equipment (Chemical)	4.4 Migration of certain elements Decoration: problem when coating done on glass
EN 14350-2:2004	Drinking equipment (Chemical)	5.2.2 Apparatus Type of container to be used: EN 71-3 or other
EN 1400-3:2002	Soothers for babies and young children (Chemical)	Type of container to be used: EN 71-3?
EN 12586:2007	Soother holder (safety and test)	5.1.4.2 Ventilation holes & B.10 "Guide tests and ventilation holes" Requirement for ventilation hole and effect on Guides 1 & 2
EN 12586:2007	Soother holder (safety and test)	5.1.4.2 Ventilation holes Requirement for specific holder (soother holder having additional function)
EN 1400-3:2002	Soothers for babies and young children (Chemical)	Migration of certain elements: analytical correction drafting to be aligned with EN 71-3
EN 14350-2:2004	Drinking equipment (Chemical)	
EN 14372:2004	Cutlery and feeding utensils (safety & test)	
EN 12586:2007	Soother holder (safety and test)	
EN 14372:2004	Cutlery and feeding utensils (safety and test)	5.3.1 Tensile strength Detachment for washing purpose
EN 12586:2007	Soother holder (safety and test)	5.1.4.2 Ventilation holes, 5.1.12.4 Supplementary components permanently attached to the strap or to the fasteners) Requirement for specific holder (soother holder having additional function)
EN 12221-1:2008	Changing units for domestic use (safety)	Applicability of the standard in case of additional changing table attached to the cot
EN 12221-2:2008	Changing units for domestic use (test)	
EN 1888:2003	Wheeled child conveyances	11.2 Operating device unlocking procedure
EN 1273:2005	Baby walking frames	6.6 Prevention of falls down steps test Confusion on requirements for test platform

Standard	Title	Subject
EN 1930:2011	Safety barriers — Safety requirements and test methods	6.4.1.3 Automatic closing system
EN 12221-1:2008	Changing units for domestic use (safety)	5.1.3 Entrapment of head, neck and torso
EN 12221-2:2008	Changing units for domestic use (test)	

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

a) 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.

b) 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:

1) an interpretation of the standard:

this should reflect a reasonable interpretation of how the standard should be used, while taking into account:

- i) the wording of the standard;
- ii) the rationale of the standard;
- iii) the history of the standard;

2) a no-action decision:

this is applicable when it is agreed that the standard appropriately specifies how a child care article shall be assessed;

3) 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.

c) 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 1273:2005, *Child use and care articles — Baby walking frames — Safety requirements and test methods*;
- 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 1888:2012, *Child care articles — Wheeled child conveyances — Safety requirements and test methods*;
- EN 1930:2011, *Child use and care articles — Safety barriers — Safety requirements and test methods*;
- EN 12586:2007, *Child use and care articles — Soother holder — Safety requirements and test methods*;
- EN 12790:2009, *Child use and care articles — Reclined cradles*;
- EN 12221-1:2008, *Changing units for domestic use — Part 1: Safety requirements*;
- EN 12221-2:2008, *Changing units for domestic use — Part 2: Test methods*;
- EN 1466:2004+A1:2007, *Child care articles — Carry cots and stands — Safety requirements and test methods*;
- EN 14350-2:2004, *Child use and care articles — Drinking equipment — Part 2: Chemical requirements and tests*;
- EN 1400-3:2002, *Child use and care articles — Soothers for babies and young children — Part 3: Chemical requirements and tests*;
- EN 14372:2004, *Child use and care articles — Cutlery and feeding utensils — Safety requirements and tests*.

2 00252033 - EN 1273:2005, *Child use and care articles — Baby walking frames — Safety requirements and test methods*

Table 1 — Summary table of the request for interpretations classified in the order of the clauses/subclauses of EN 1273:2005

Clause/Subclause	Title	Interpretation n°
6.1.1		1/2013

<https://standards.iteh.ai/catalog/standards/sist/54ef486c-3d87-46cd-ada4-dcc8da9aacaf/sist->

Table 2 — Table of the request for interpretation/clarification for EN 1273:2005

N°	Clause/ Subclause/ Annex	Paragraph/ Figure/ Table/Note	Question	Reply
1	6.1.1		For the tests order shall we follow 6.1.1. but what is the “test order of the standard” ? Is it the order of requirement §5 or order of tests methods §6 ? . In one case the §5.9 should be done after §5.14.	

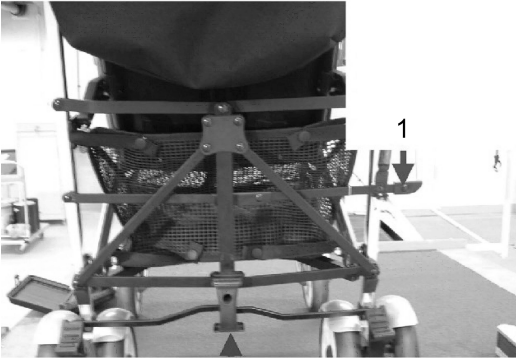
3 00252009 – EN 1888:2003, *Child care articles — Wheeled child conveyances — Safety requirements and test methods*

Table 3 — Summary table of the request for interpretations classified in the order of the clauses/subclauses of 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 4 — Table of the request for interpretation/clarification for EN 1888:2003

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"> — Put the stroller with the front wheels against some stops and restrain the vehicle to avoid its tipping over, for example by 	

N°	Clause/ Subclause/ Annex	Paragraph/ Figure/ Table/Note	Question	Reply
			<p>attaching a cord under the stroller to fix it to the floor. Pull then the handle with a force of 200 N. In case of separate handles pull each handle separately with 200 N.</p>	
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 200 N. In case of separate handles pull each handle separately with 200 N.</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>Key</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>Figure 1 — Stroller with a standard folding lock</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"> 1) two separate operations acting on two separate parts of the vehicle; or 2) two consecutive actions, the first being

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N°	Clause/ Subclause/ Annex	Paragraph/ Figure/ Table/Note	Question	Reply
			<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>http://standards.iteh.ai/catalog/standards/sist/54ef486c-3d87-46cd-ada4-dcc8da9aacaf/sist-tp-cen-tr-16411-2014</p>	<p>maintained while the second is carried out.</p> <p>To avoid the hazards due to incomplete deployment at least one of the locking devices shall engage automatically.</p> <p>c) Proposal for interpretation: 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 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 3.3.</p> <p>a) What is the rationale of the requirement 18.1 (no</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 EN 1888.</p>

N°	Clause/ Subclause/ Annex	Paragraph/ Figure/ Table/Note	Question	Reply
			displacement greater than 10 mm) ? b) Is this requirement applicable to soft carrycots?	
4	6.1.7		We need clarification on the meaning of tension of internal lining of the pram body or seat unit. Which risk should be covered?	The risk to be covered is the risk of suffocation due to loose fabric parts. The standard is clear enough to cover the risk.
5	21.1		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." a) What is the measurement to assess this requirement? b) Are all letters concerned?	An European standard, the CEI/TR 62017-1:2001 dealing with product information gives details. A typographic ruler (normograph) can be used to directly check that the height of letters is 10 points. <input checked="" type="checkbox"/> The wording will be changed in the revision of the standard to be in line with CEN/CENELEC Guidelines 11.
6	6.1.5		We need precision on the type of parts for which this clause applies and how. 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.	The proposal is not an interpretation, but changes the standard.. This clause is applicable to the whole product. <input checked="" type="checkbox"/> Wording will be improved during the revision work.