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Child use and care articles - 2014 compiled interpretations of CEN/TC 252 standards

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Child use and care articles - 2014 compiled interpretations of CEN/TC 252 standards

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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EUROPEAN COMMITTEE FOR STANDARDIZATION
COMITÉ EUROPÉEN DE NORMALISATION
EUROPÄISCHES KOMITEE FÜR NORMUNG

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| Contents | | Page |
|---|--|-------------|
| Foreword..... | | 3 |
| Introduction | | 4 |
| 1 Scope | | 6 |
| 2 00252033 – EN 1273:2005, <i>Child use and care articles — Baby walking frames — Safety requirements and test methods</i> | | 7 |
| 3 00252059 – EN 1888:2012, <i>Child care articles — Wheeled child conveyances — Safety requirements and test methods</i> | | 9 |
| 4 00252051 - EN 1930:2011, <i>Child use and care articles — Safety barriers — Safety requirements and test methods</i> | | 12 |
| 5 00252046 - EN 12586:2007, <i>Child use and care articles – Soother holder – Safety requirements and test methods</i> | | 13 |
| 6 00252048 - EN 12790:2009, <i>Child use and care articles — Reclined cradles</i> | | 23 |
| 7 00252049 - EN 12221-1:2008, <i>Changing units for domestic use — Part 1: Safety requirements</i> | | 24 |
| 8 00252050 - EN 12221-2:2008, <i>Changing units for domestic use — Part 2: Test methods</i> | | 27 |
| 9 00252054 - EN 1466:2004+A1:2007, <i>Child care articles — Carry cots and stands — Safety requirements and test methods</i> | | 28 |
| 10 00252032 - EN 14350-2:2004, <i>Child use and care articles — Drinking equipment — Part 2: Chemical requirements and tests</i> | | 31 |
| 11 00252089 - EN 1400:2013+A1:2014, <i>Child use and care articles - Soothers for babies and young children - Safety requirements and test methods</i> | | 32 |
| 12 00252024 - EN 14372:2004, <i>Child use and care articles — Cutlery and feeding utensils — Safety requirements and tests</i> | | 39 |
| 13 EN 16120:2012, <i>Child use and care articles - Chair mounted seat</i> | | 40 |
| 14 00252067 – CEN/TR 16411:2012, <i>Child use and care articles - 2012 compiled interpretations of CEN/TC 252 standards</i> | | 42 |
| Annex A (informative) Interpretation 3 on 3.9 and 5.1.4.2 in EN 12586:2007, <i>Child use and care articles — Soother holder — Safety requirements and test methods (WI 00252046)</i> | | 44 |
| A.1 Introduction | | 44 |
| A.2 Examples of possible ventilation holes in more recent models of soother holders | | 45 |
| Annex B (informative) Reply to interpretation 3 on 3.9 and 5.1.4.2 in EN 12586:2007, <i>Child use and care articles — Soother holder — Safety requirements and test methods (WI 00252046)</i> | | 47 |
| Annex C (informative) Reply to interpretation 1 on 5.1.10 in EN 12586:2007, <i>Child use and care articles — Soother holder — Safety requirements and test methods (WI 00252046)</i> | | 49 |
| C.1 Ventilation holes in fastener (5.1.10) | | 49 |
| C.2 Discussion..... | | 49 |
| C.3 Final Interpretation | | 54 |
| Bibliography | | 55 |

Foreword

This document (FprCEN/TR 16411:2014) 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.

The list below shows the requests for clarification/interpretation approved since 2013 plenary meeting:

| N° | Standard | Title | Subject | Doc N° |
|----|----------------------|--|--|--------|
| 1 | EN 12586:2007 | Soother holder (safety & test) | Ventilation holes for clips (5.1.4.2 (B.11) 6.1.9.2 (Figure 16&17) | N 1228 |
| 2 | EN 1273:2005 | Baby walking frames – Safety requirements and test methods | 6.6.2.3 "tip over test" | N 1266 |
| 3 | EN 16120:2012 | Chair mounted seat | 8.1.2 "removal of the child : case of unintentional locking device" | N 1219 |
| 4 | EN 1888:2012 | Wheeled child conveyances – Safety requirements and test methods | 4.5.3 " The protected volume for pram body", 6 "consideration of phthalates" 8.4 " connection point of the cord/string/narrow fabric and location of the connection" 8.9.1.2.1 "brakes" | N 1215 |
| 5 | EN 14350-2:2004 | Drinking equipment | Clause 8 "Clarify of the text" in Product information | N 1194 |
| 6 | EN 1400:2013+A1:2014 | Soothers for babies and young children | Clause 6"Clarify of the text" in Product information | N 1194 |
| 7 | CEN/TR 16411:2012 | 2012 compiled interpretations of CEN/TC 252 standards | 5.1.4.2 "ventilation holes" | N°1262 |
| 8 | EN 12586:2007 | Soother holder - Safety requirements and test methods | 5.1.4.2 "ventilation holes" | N°1262 |
| 9 | EN 1400:2013+A1:2014 | Soothers for babies and young children | 8.3 "axis of shield" | 1255 |
| 10 | EN 1400:2013+A1:2014 | Soothers for babies and young children | Various requests on the use of "should" | |

Introduction

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 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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FprCEN/TR 16411:2014 (E)

1 Scope

The purpose of this 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 1888:2012, *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 1400:2013+A1:2014 *Child use and care articles — Soothers for babies and young children*;
- EN 14372:2004, *Child use and care articles — Cutlery and feeding utensils — Safety requirements and tests*;
- EN 12586:2007, *Child use and care articles — Soother holder — Safety requirements and test methods*;
- CEN/TR 16411:2012, *Child use and care articles — 2012 compiled interpretations of CEN/TC 252 standards*

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 |
| 6.6.2.3 | | 1/2014 (2) |

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. | |
| 2 | 6.6.2.3 | | <p>In certain designs of baby walking frames (e.g. non-castor wheels in the back), after the sideways step test in accordance with 6.6.2.3, the product stops with only one front wheel off the platform and with the rear wheels almost in the initial position (see picture).</p>  <p>The mirror committee has been made aware of a lab manually moving the product before performing the tip over test in 6.6.3.2 so that one front wheel and one back wheel will be off the platform.</p> <p>Is the intention of the standard to perform the tip over test starting from the position in which the product has stopped after the step test in 6.6.2.3 (see picture above) or is it correct to move the product between 6.6.2.3 and 6.6.3.2</p> | <p>As neither in clause 6.6.2.3 nor 6.6.3.2 there is an indication to change the position of the product from the position where it has stopped after the test in 6.6.2.3, the tip over test in clause 6.6.3.2 shall be performed starting from the position in which the product has stopped after the step test in 6.6.2.3 without changing the position of the product or of its wheels.</p> |

FprCEN/TR 16411:2014 (E)

| N° | Clause/ Subclause/ Annex | Paragraph/ Figure/ Table/Note | Question | Reply |
|----|--------------------------------|-------------------------------------|---|-------|
| | | | so that both the front and the rear wheels on one side are always off the platform? | |

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3 00252059 – EN 1888:2012, 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 1888:2012


| Clause/Subclause | Title | Interpretation n° |
|------------------|----------------------------|-------------------|
| 4.5.3 | Various requests | 2 |
| 8.9.1.2.1 | Uses of "stop" for parking | 3 |

Table 4 — Table of the request for interpretation/clarification for EN 1888:2012

| N° | Clause/ Subclause/ Annex | Question | Reply |
|----|--------------------------------|---|--|
| 2 | 4.5.3 | 1. There is a difference between the structure of this clause and clauses 4.5.1 (paragraph 1) and clauses 4.5.2 (paragraph 1) that begin with the words, "The protected volume...". Is there a reason for the difference? | No there is no reason for the difference. It's just a different wording. The standard makes a clear distinction on the protected volume for pram bodies designed for children less than 6 months (less than 800 mm length) and pram bodies designed for older children (over 800 mm internal length) |
| 2 | 4.5.3 | 2. Is the clause applicable for pram bodies having a maximum internal length of 800 mm combined with a vehicle child conveyance for children older than 6 months? | No we considered that a pram body with an internal length less than 800 mm is designed for children less than 6 month. Of course the vehicle may be used for older children, but not in pram use (suitability and requirements of the seat unit) |
| 2 | 4.5.3 | 3. The Experts Committee recommends that the word "only" be deleted from the first sentence. Will there be any implications by this change? Are there wheeled child conveyances designed only for children up to 6 months? | Yes the word "only" can be deleted without modifying the purpose of this clause. The protected volume described here concerns pram bodies less than 800 mm long and group 0/0+ car seats mounted on a vehicle |
| 2 | 6 | This clause does not mention nonmetals such as phthalates. Is there a reason | Yes phthalates as other hazardous substances |

FprCEN/TR 16411:2014 (E)

| N° | Clause/ Subclause/ Annex | Question | Reply |
|----|--------------------------------|--|---|
| | | for that? Is this requirement mentioned in some other required source? | are already covered by a regulation (REACH) therefore there is no need to have it into the standard. |
| 2 | 8.4 | Is there any significance to the location of the connection point of the cord/string/narrow fabric? | The purpose of the requirement is to avoid free length inside the protected volume that will cause a strangulation hazard. We don't consider the attachment point of such cords strings/ narrow fabrics, but the length which is likely to exceed the acceptable measure inside the seat unit or pram body. |
| 2 | 8.4 | <p>Does the requirement apply to a connection located outside of the seat unit or pram body that can be pulled into the inside of the seat unit or pram body with the force of 25 N?</p> <p>Example 1:</p> <p>There are seat units having a strip, for adjustment of the backrest, located at the rear of the backrest. When pulled into the inside of the seat unit with a force of 25 N, the length of the strip (the part of it that is now located inside the seat unit) exceeds 220 mm. Is it considered to be a failure? (see Figure A bellow)</p> <p>Figure A</p> <p>Example 2:</p> <p>There are seat units having a strip, attended to be attached to the carrier's hand, connected to the vehicle's handle. If a part of that strip penetrates to the inside of the seat unit or pram body, does the requirement apply to that part of the strip?</p> | <p>Yes it does</p> <p>Example 1: yes it is considered as a failure. It is a loop exceeding 360 mm and there is no detail in the standard on the location of the loop.</p> <p>Example 2:</p> <p>In English the word "located" means "attached".</p> <p>The intention of the working group was to take into account the part of any cord/string/narrow fabric that can be found inside the pram body or seat unit, without being necessarily attached inside the pram body or seat unit.</p> <p>An amendment is needed and will be drafted to clarify this requirement.</p> |

| N° | Clause/ Subclause/ Annex | Question | Reply |
|----|--------------------------------|---|--|
| | |  <p style="text-align: center;">Figure A</p> <p>Example 2: There are seat units having a strip, attended to be attached to the carrier's hand, connected to the vehicle's handle. If a part of that strip penetrates to the inside of the seat unit or pram body, does the requirement apply to that part of the strip?</p> | |
| 3 | 8.9.1.2.1 | <p>To our experience there are different interpretations between different labs on this point of the standard. And the confusion seems to be regarding the way the wheels should be turned after putting on the brakes, before placing the stroller against the stop. Leading to different results on same product from different labs.</p> | <p>The principle of the test method is to ensure the use of a stop has the lowest effect on the test (possibly no effect)</p> <p>Parking devices shall be engaged first, and then the vehicle is placed on the slope.</p> <p>The most onerous condition shall be met (in accordance with § 4) when allowing the vehicle to rest against the stop.</p> <p>The test method shall be amended.</p> |

4 00252051 - EN 1930:2011, Child use and care articles — Safety barriers — Safety requirements and test methods

Table 5 — Summary table of the request for interpretations classified in the order of the clauses/subclauses of EN 1930:2011

| Clause/Subclause | Title | Interpretation n° |
|------------------|-------|-------------------|
| 6.4.1.3. | | 1/2012 |

Table 6 — Table of the request for interpretation/clarification for EN 1930:2011

| N° | Clause/ Subclause/ Annex | Question | Reply |
|----|--------------------------------|--|--|
| 1 | 6.4.1.3. | The standard specifies in the test for barriers with a closing system with a mechanism that closes the system without the intervention of the user that the tester must operate the opening and closing system 10 times from the maximum and minimum opening positions. The question was how the maximum and minimum opening positions are determined. | <p>WG4 experts have discussed 6.4.1.3. and make the following clarification:</p> <p>The automatic mechanism shall always close and lock throughout the whole range of opening (from 0° and above) without the intervention of the user.</p> <p>Minimum and maximum openings may not be the most onerous condition therefore intermediate positions shall be checked.</p> |

5 00252046 - EN 12586:2007, *Child use and care articles – Soother holder – Safety requirements and test methods*

Table 7 — Summary table of the request for interpretations classified in the order of the clauses/subclauses of EN 12586:2007

| Clause/Subclause | Title | Interpretation n° |
|--------------------|--|-------------------|
| 5.1.10 | Permanent fasteners | 1 |
| 3.9 | Ventilation hole | 3 |
| 5.1.4.2 | Ventilation holes | 3 |
| 5.1.4.2 | Migration of certain elements | 4 |
| 5.1.4.2 & B.10 | Surface dimension and ventilation holes | 5 |
| 5.1.4.2 | Hole for soother older when dealing with toy functions | 6 |
| 5.1.4.2 | 25 mm diameter circle for ventilation hole needs? | 6 |
| 5.1.12.4 & 5.1.4.2 | Hole for soother older when dealing with toy functions | 7 |
| 5.1.4.2 | Ventilation holes | 8 |

Table 8 — Table of the request for interpretation/clarification for EN 12586:2007

| N° | Clause/ Subclause/ Annex | Question | Reply |
|----|--------------------------------|---|---|
| 1 | 5.1.10 | <p>This subclause does not specify the checking condition of the product.</p> <p>If there is a movable part on the holder that can be placed over a hole of the fastener, over part of a hole of the fastener in a way to reduce the passage, shall the operator check this subclause with the movable part in all possible positions, in all possible positions when in use, in the positions given in the instruction for use, in the most onerous condition?</p> | <p>The final opinion of CEN/TC 252/WG 5 is reported in Annex C of the current document.</p> |
| 3 | 3.9 & 5.1.4.2 | <p>The main purpose of the clarification requested in Annex A is to seek guidance regarding ventilation holes in soother holder fasteners, which do not necessarily follow the examples provided</p> | <p>There were no requirements in EN 12586:2007 which would suggest a failure of the examples given in the ASI Interpretation request. The final opinion of WG 5 is reported</p> |