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Safety of toys - Interpretations - Part 1: Replies to requests for interpretation of EN 71-1, EN 71-2, EN 71-8 and EN 71-14

Sicherheit von Spielzeug - Antworten auf Anfragen zur Interpretation von EN 71-1, EN 71-2 und EN 71-8

Sécurité des jouets - Interprétations - Partie 1: Réponses aux demandes d'interprétation de EN 71-1, EN 71-2, EN 71-8 et EN 71-14

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Foreword

This document (FprCEN/TR 15371-1:2015) has been prepared by Technical Committee CEN/TC 52 “Safety of toys”, the secretariat of which is held by DS.

This document is currently submitted to the Technical Committee Approval.

This document will supersede CEN/TR 15371:2014.

FprCEN/TR 15371, *Safety of toys — Interpretations*, is currently composed with the following parts:

- *Part 1: Replies to requests for interpretation of EN 71-1, EN 71-2, EN 71-8 and EN 71-14;*
- *Part 2: Replies to requests for interpretation of the chemical standards in the EN 71-series.*

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0 Introduction

0.1 Interpretations and no-action decisions

This Technical Report contains replies to requests for interpretations concerning the understanding of clauses in EN 71-1:2014, EN 71-2:2011+A1:2014, EN 71-8:2011 and EN 71-14:2014. 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.

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.

0.2 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 CEN/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:

- 1) the wording of the standard;
- 2) the rationale of the standard;
- 3) 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.

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.

0.3 Answers to requests for interpretations

Since requests for interpretations are submitted through a CEN member body or a CEN/TC 52 liaison, it is assumed that they will keep themselves informed about decisions concerning the request and its progress and will themselves inform the originator of the request as appropriate.

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1 Scope

The purpose of this Technical Report is to provide replies to requests for interpretations of EN 71-1:2014, *Safety of toys — Part 1: Mechanical and physical properties*, EN 71-2:2011+A1:2014, *Safety of toys — Part 2: Flammability*, EN 71-8:2011, *Safety of toys — Part 8: Activity toys for domestic use* and EN 71-14:2014, *Safety of toys — Part 14: Trampolines for domestic use*.

2 EN 71-1:2014, Safety of toys – Part 1: Mechanical and physical properties

2.1 3.12 Cord (no action decision)

Question

The question relates to 3.12 “cord” of EN 71-1.

The standard defines *cord* as:

“length of flexible textile or non-textile material including *elastic material*, monofilament polymeric material, *tape, ribbon, rope, strap*, woven and twisted material and string as well as certain weak and long *springs*”

Soft filled parts of a soft filled toy are not included by the definition of *cord*. Therefore, the requirements of 5.4 shall not be applied to those parts.

In the example provided, the tail of Figure 1 and the toy of Figure 3 are soft filled, while the tail of Figure 2 is not soft filled, therefore 5.4 is applicable only to the tail of Figure 2. Is it correct?



Figure 1



Figure 2



Figure 3

Reply

Standard is clear. Soft-filled parts of toys are not cords as defined in the standard. The tail of the toy in Figure 2 is considered a cord because there is not stuffing material inside.

REQ 104-12 (UNI, Italy)

2.2 3.30 Fuzz (no action decision)

Question

The question relates to 3.30 “fuzz” of EN 71-1.

Some soft filled toys may have fur with long hairs, even longer than 50 mm. We do know that such hairs are not to be considered as monofilament fibres.

If the toy loses these hairs when pet (as per foreseeable use), as in the attached picture, even in great amount, is it correct to consider these hairs included in the definition of fuzz, therefore excluding them from the requirements of 5.1?



Figure 4



Figure 5

Reply

Standard is clear. It is correct to consider the described fibres as fuzz (which is excluded from 5.1 requirements).

REQ 105-12 (UNI, Italy)

2.3 3.33 Large and bulky toy (interpretation)

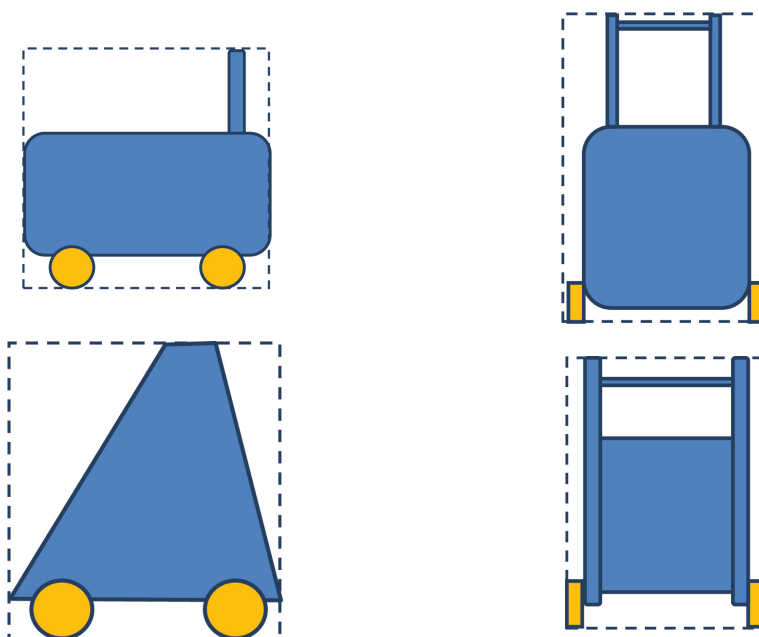
Question

How do you measure the volume of large and bulky toys as defined in 3.33 of EN 71-1:2014?

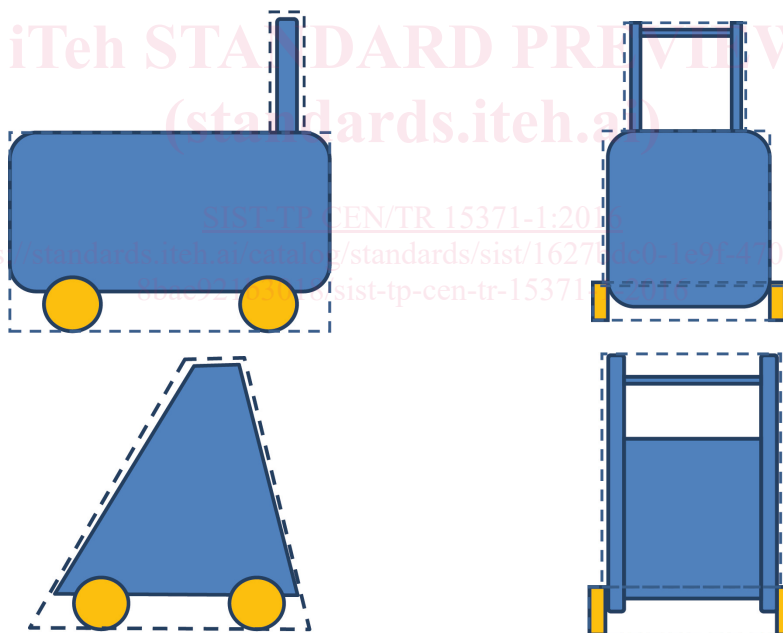
Here are two possible ways. Option A or Option B (see drawings below)?

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OPTION A: GLOBAL VOLUME CALCULATION



OPTION B : follow the shape to calculate volume



Toy 1

Interpretation

The volume is considered to be smallest imaginary box that would contain the toy after having removed minor appendages which actually is option A above.

Minor appendages would be the wooden elements on the sides of toy 1.

REQ 134-13 (BSI, United Kingdom)

2.4 3.47 and 3.48 Projectile toys (no action decision)

Question

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

3.47

projectile toy with stored energy

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

3.48

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 3.48. However, the toy is obviously also not within 3.47 because we interpret 3.47 so that the toy shall 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 3.48 even if a spring is used in launching the projectile.



Figure 6

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)

FprCEN/TR 15371-1:2015 (E)

2.5 3.47, 3.48 and 7.7 Projectile toys (no action decision)

Question

Even if we are aware of the ongoing discussion about the revision on projectiles requirements, we ask to give an official interpretation of the following issue to interpret correctly the current version of the standard.

- a) EN 71-1 defines as projectile an “object intended to be launched into free flight or a trajectory in the air”
- 3) does this include toys like boomerang or frisbee?
 - 2) does this include small toys designed in such a way that hitting their base, they make a little jump, rotating on themselves? (to figure them think about a spoon on a table: hitting its extremity you can have it make this kind of jump)
 - 1) does it include objects launched by catapult toys?
- b) If a toy has a spring or an elastic band, but no mechanism to hold the projectile in the “charged” condition (this means that as soon as you release the projectile, it is launched, like in a bow), is it considered “projectile toy with stored energy” (the spring and elastic are considered as discharge mechanisms) or as a “projectile toy without stored energy” (the energy of the projectile depend upon how much the child put the projectile into the toy, like a bow, even if, differently from bows, in this case usually there is an “end of stroke” and the maximum projectile energy is defined)?
- c) 7.7 defines two warnings: not to use different projectiles from the supplied ones and not to aim at eyes or face.

We consider the first one applicable to all the projectile toys from which a generic projectile may be launched (for example projectile toy with stored energy or bows), but not applicable for toys without stored energy like catapults (4.17.2 does not give any reference to 7.7).

Instead we consider the second warning (“Aim at face”) applicable only to projectiles toys with stored energy or bows with a kinetic energy greater than 0,08 J.

Is it correct?

Reply

- a) 1) Standard is clear those toys enter into the projectiles definition.
- a) 2) Standard is clear those toys enter into the projectiles definition.
- a) 3) Standard is clear those toys enter into the projectiles definition (provided those “catapults” do not enter into the exclusion list as outlined into EN 71-1 scope).
- b) Standard is clear this is a “projectile toy without stored energy” (see 3.48 definition) provided the described item is not regarded as a catapult and therefore enters into the exclusion list as outlined into EN 71-1 scope.
- c) Standard is clear for projectile toys with stored energy in 4.17.3 c). If a discharge mechanism is able to discharge an object other than that provided with the toy, then labelling according to 7.7.1 is required. If a toy is capable of discharging a projectile with a kinetic energy greater than 0,08 J, labelling according to 7.7.2 is required. If a toy meets both conditions then the two labelling are required.
- Bows and arrows shall only bear “Warning. Do not aim at eyes or face” under the conditions outlined in 4.17.4
- c)

REQ 076-07 Part 1 (UNI, Italy)

2.6 4.3 Flexible plastic sheeting (no action decision)

Question 1

4.3 applies only to plastic sheeting having dimensions greater than 100 mm X 100 mm. If a plastic bag has a dimension of 100 mm X 80 mm, as it is, does the requirement apply?

Question 2

If we consider the plastic bag, its dimension is less than 100 mm X 100 mm, but if we consider the plastic sheeting, cutting the plastic bag along two edges, we can get a 100 mm X 160 mm (80 mm X 2). But, especially if the toy is intended only for children over 36 months of age, it is not required to apply any cutting.

And, if the toy is intended for children under 36 months of age, and we apply the tension test to the bag, before to break it into a plastic sheet, it is foreseeable that the applied 90 N force will elongate the plastic sheeting and thus will also make it having a thinner thickness.

Moreover, the test method of 8.25.1.2 reads "For plastic bags, cut along the seams without stretching the bag so that two single sheets are produced."

But this test method is referred both by 4.3 and by Clause 6 (which does not apply to toy bags which have a play value in the toy).

In our opinion the need to cut the bag along the seams is referred to packaging bags, and not to plastic sheeting addressed by 4.3. The reason for this interpretation is that in case of bags with an opening perimeter greater than 380 mm (as required by Clause 6), the child can put his head inside the bag and so it can have on his nose and mouth just one sheet of the twos forming the bag.

But if 4.3 is not applicable to plastic bags, but to plastic sheeting only, we can have plastic bags with an opening perimeter less than 380 mm and with a thickness of less than 0,038 mm both for packaging and for bags having a play value (4.4 does not require a minimum thickness and Clause 6 defines a minimum thickness only for plastic bags with an opening perimeter greater than 380 mm).

The reason for this may be that bags (in which the child cannot put his head), having a double layer, are less foreseeable to become attached to a child's face in such a way to cause asphyxiation, differently from single layer plastic sheeting (this is just a supposition). Thus, one of the following should apply:

- 1) If the sheet is in a form of a plastic bag, its whole area shall be measured (not the area of the plastic bag, and thus the area which is the sum of the two layers area). The measurements are performed before any mechanical test.
- 2) For plastic bags only the area of the plastic bag (double layer) shall be taken into account. The measurements are performed before any mechanical test.
- 3) The area and the thickness of the plastic bags shall be measured after the mechanical tests (which ones, especially in the case of toys intended for children above 36 months of age?).

Which one is the correct one?

Reply

To question 1: The requirement does not apply

To question 2: Option 2 is the correct one

REQ 090-09 (UNI, Italy)