



**SLOVENSKI STANDARD**  
**kSIST-TP FprCEN/TR 16411:2019**  
**01-januar-2019**

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**Izdelki za otroke - Zbrane interpretacije standardov CEN/TC 252**

Child care articles - Compiled interpretations of CEN/TC 252 standards

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

**Ta slovenski standard je istoveten z: FprCEN/TR 16411**

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Equipment for children

**kSIST-TP FprCEN/TR 16411:2019**

**en**



TECHNICAL REPORT  
RAPPORT TECHNIQUE  
TECHNISCHER BERICHT

**FINAL DRAFT**  
**FprCEN/TR 16411**

November 2018

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Will supersede CEN/TR 16411:2014

English Version

**Child care articles - Compiled interpretations of CEN/TC  
252 standards**

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

This draft Technical Report is submitted to CEN members for Vote. 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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EUROPEAN COMMITTEE FOR STANDARDIZATION  
COMITÉ EUROPÉEN DE NORMALISATION  
EUROPÄISCHES KOMITEE FÜR NORMUNG

**CEN-CENELEC Management Centre: Rue de la Science 23, B-1040 Brussels**

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## European foreword

This document (FprCEN/TR 16411:2018) has been prepared by Technical Committee CEN/TC 252 “Child care articles”, the secretariat of which is held by AFNOR.

This document is currently submitted to the Vote on TR.

This document will supersede CEN/TR 16411:2014.

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## 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 should 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 Interpretations 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.

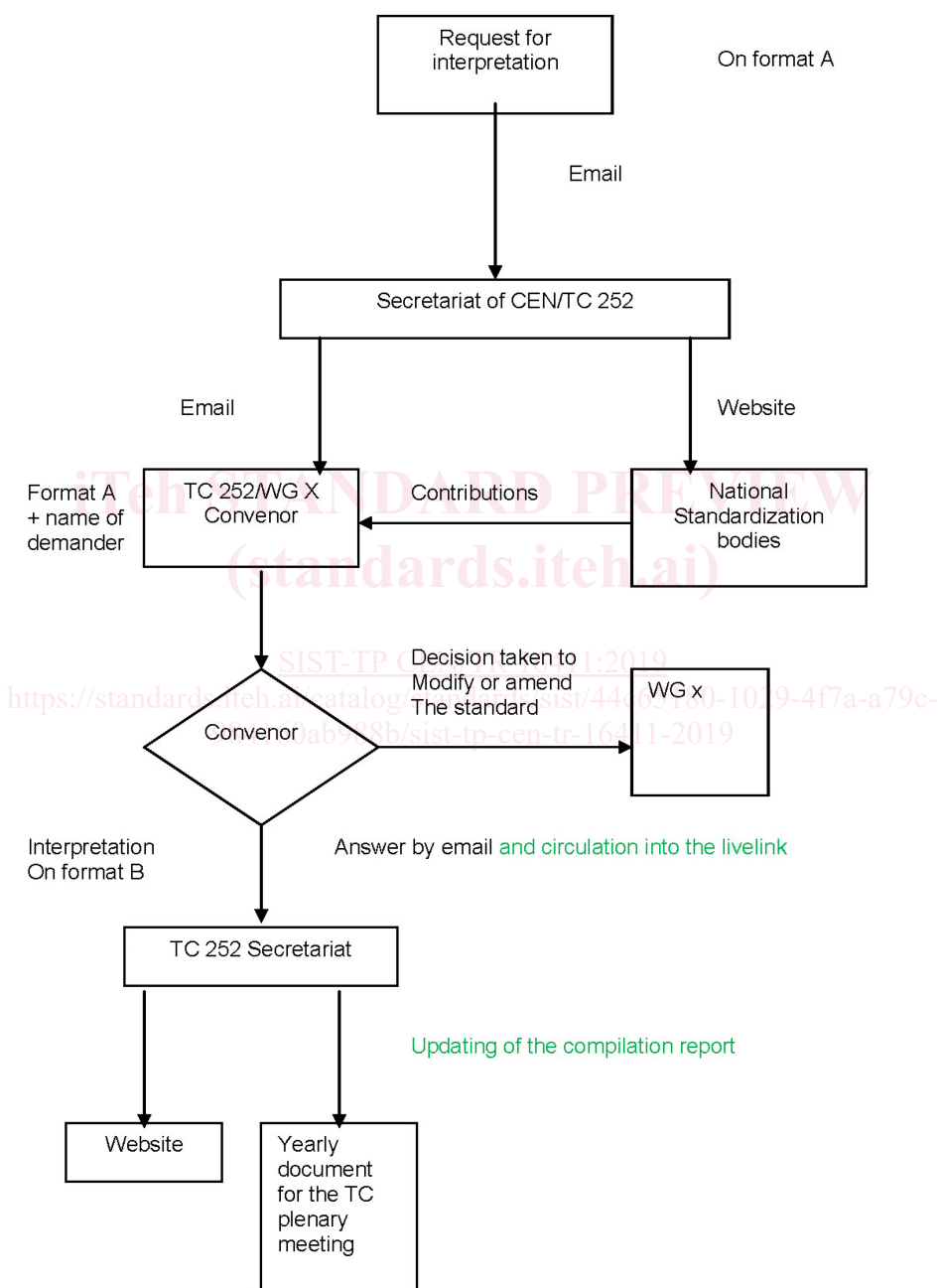
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## FLOW CHART



## 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 1888:2012, *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 1400:2013+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 16120:2012, *Child use and care articles — Chair mounted seat*;
- EN 14350-1:2004, *Child use and care articles — Drinking equipment - Part 1: General and mechanical requirements and tests*;
- EN 16232:2013, *Child use and care articles — Infant swings*.

## 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.	

## FprCEN/TR 16411:2018 (E)

N°	Clause/ Subclause / Annex	Paragraph/ Figure/ Table/Note	Question	Reply
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 so that both the front and the rear wheels on one side are always off the platform?</p>	<p>As neither in 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 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>

### 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°
1	Scope	6/2015
3.3 & 3.4	Definitions	12/2015
4.5.1	Protected volume	8/2015
4.5.3	Various requests	2
8.3.1		4/2015
8.3.3	Folding mechanism	13/2016
8.3.3.1.2.4	Locking mechanisms	9, 10 & 11/2015
8.4		17/2018
8.5	Choking and ingestion hazards	14/2017
8.5.2.3	Bite test	16/2017
8;8.1	Parking and braking	15/2017
8.9.1.2.1	Uses of “stop” for parking	3
10.2.6	Marking	7/2015
10.4	Instructions for use	5/2014

**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 for that? Is this requirement mentioned in some other required source?	Yes phthalates as other hazardous substances 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

N°	Clause/ Subclause / Annex	Question	Reply
		<p><a href="https://standards.iteh.ai">https://standards.iteh.ai</a></p>	<p><del>straps or</del> strings/ narrow fabrics, but the length which is likely to exceed the acceptable measure inside the <del>protected volume</del>. Seat unit or pram body.</p>
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 below)</p> <p>Figure A</p> <p>Example 2:</p> <p>There are seat units having a strip, intended 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>