

SLOVENSKI STANDARD

SIST-TP CEN/TR 15371-1:2017

01-julij-2017

Nadomešča:

SIST-TP CEN/TR 15371-1:2016

Varnost igráč - Razlaga - 1. del: Odgovori na zahteve po razlagi standardov EN 71-1, EN 71-2, EN 71-8 in EN 71-14

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 - Interpretationen - Teil 1: Antworten auf Anfragen zur Interpretation von EN 71-1, EN 71-2, EN 71-8 und EN 71-14

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

Ta slovenski standard je istoveten z: CEN/TR 15371-1:2017

ICS:

97.200.50 Igrače Toys

SIST-TP CEN/TR 15371-1:2017 en

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TECHNICAL REPORT

CEN/TR 15371-1

RAPPORT TECHNIQUE

TECHNISCHER BERICHT

May 2017

ICS 97.200.50

Supersedes CEN/TR 15371-1:2015

English Version

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

Sécurité des jouets - Interprétations - Partie 1:
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EN 71-2, EN 71-8 et EN 71-14

Sicherheit von Spielzeug - Interpretationen - Teil 1:
Antworten auf Anfragen zur Interpretation von EN 71-
1, EN 71-2, EN 71-8 und EN 71-14

This Technical Report was approved by CEN on 18 April 2017. It has been drawn up by the Technical Committee CEN/TC 52.

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European foreword

This document (CEN/TR 15371-1:2017) has been prepared by Technical Committee CEN/TC 52 “Safety of toys”, the secretariat of which is held by DS.

Attention is drawn to the possibility that some of the elements of this document may be the subject of patent rights. CEN [and/or CENELEC] shall not be held responsible for identifying any or all such patent rights.

This document supersedes CEN/TR 15371-1:2015.

CEN/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 such that stakeholders can apply it correctly in a conformity assessment. An interpretation is not an assessment of the requirement in the standard - it is only a strict interpretation of the meaning of the text.

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 the CEN/TR 15371 series, 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

2.13.5 Ball (interpretation)

Question

The definition of a ball according to Clause 3.5 is:

“Spherical, ovoid or ellipsoidal object, usually but not always designed or intended to be thrown, hit kicked, rolled, dropped or bounced”.

There is an additional note explaining the ball definition includes multisided objects formed by at least 48 connecting planes into a generally spherical, ovoid or ellipsoidal shape.

What about spherical, ovoid or ellipsoidal objects having small protrusions or projections?

See below some examples of toys intended for children under 3 years of age that have a generally spherical, ovoid or ellipsoidal shape but in addition have protrusions or projections.

Should they be considered as balls? (standards.iteh.ai)

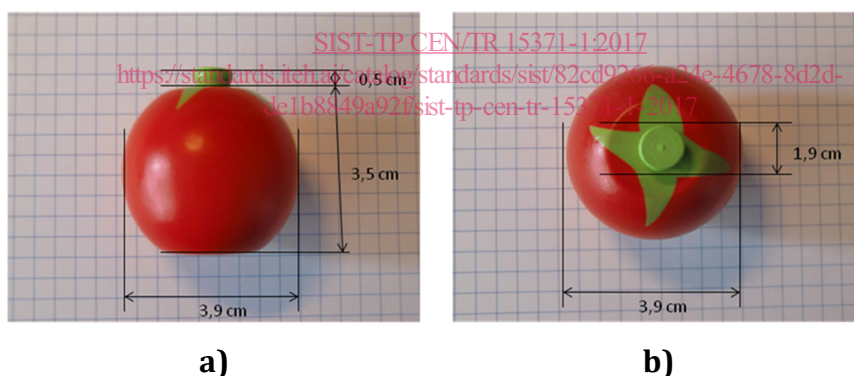
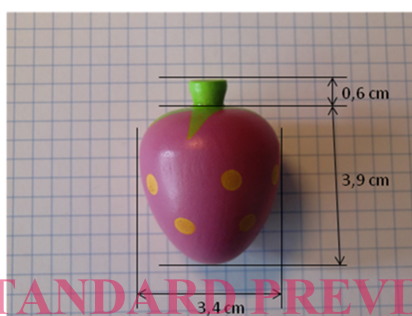
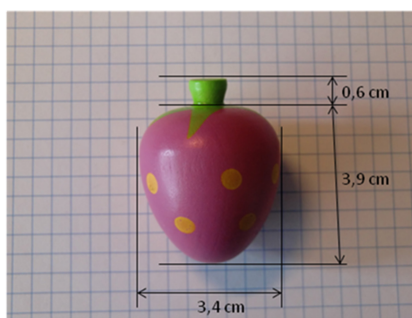


Figure 1

Ratio: minor/major axes = 90 % (green protrusion not counted) or 97,5 % (green protrusion counted)



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Figure 2

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Ratio: minor/major axes = 87 % (green protrusion not counted) or 75,5 % (green protrusion counted)

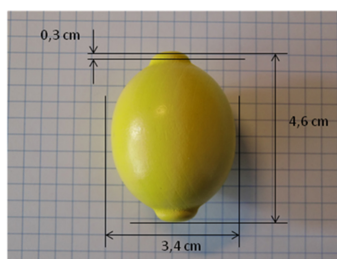


Figure 3

Ratio: minor/major axes = 74 % (yellow ends elements considered to be part of the whole shape)

Reply

The three toys as presented here would fall under the definition of balls and are subject to the requirements for small balls per EN 71-1. In the case of the tomato and purple strawberry the protrusions are on one side only and they are small. They appear to make no difference in the assessment of the ratio between minor and major dimensions mentioned in the informative annex. For the lemon shape the small end elements are considered to be part of the overall ellipsoidal shape. This interpretation is only valid for the toys evaluated under this request.

REQ 156-15 (NEN, Netherlands)

2.23.12 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 4

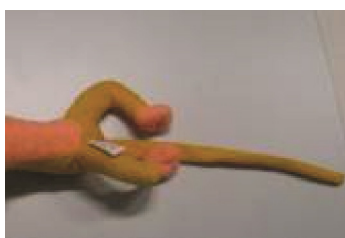


Figure 5



Figure 6

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)

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2.33.30 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 7



Figure 8

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)

2.43.33 Large and bulky toy (interpretation)**Question**

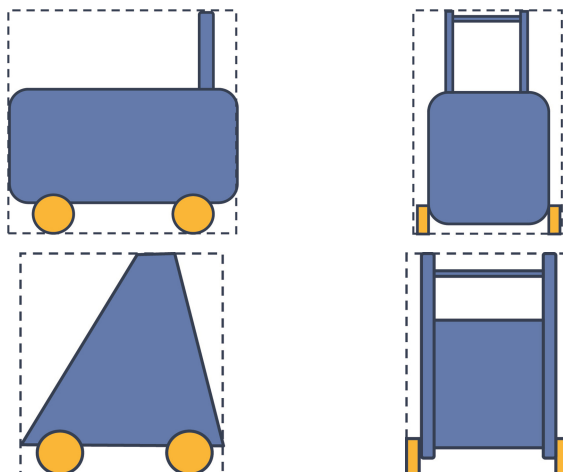
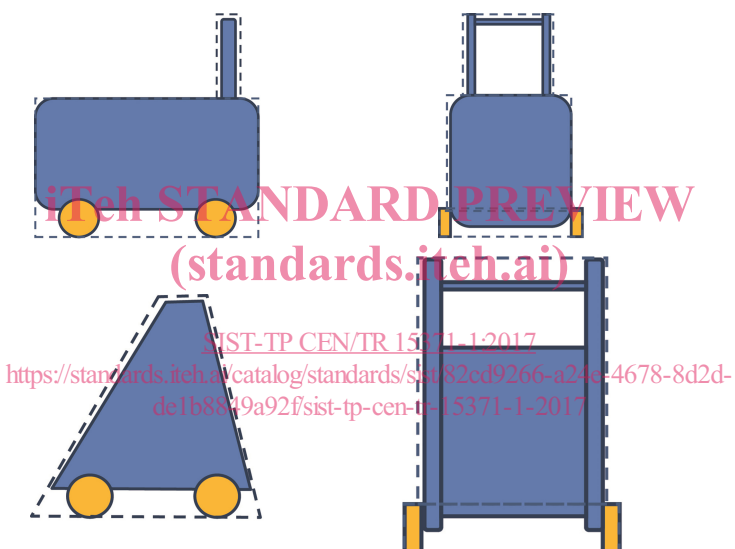
How do you measure the volume of large and bulky toys as defined in 3.33 of EN 71-1:2014?

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)

2.53.47 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.

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Figure 9

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)

2.63.47, 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.

- EN 71-1 defines as projectile an “object intended to be launched into free flight or a trajectory in the air”