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## Oprema otroških igrišč - Odgovori na zahteve za razlago EN 1176 in njegovih delov

Playground equipment for children - Replies to requests for interpretation of EN 1176 and its parts.

Spielplatzgeräte für Kinder - Antworten auf Interpretationsanfragen zu EN 1176 und dazugehörigen Teilen

Ta slovenski standard je istoveten z: **CEN/TR 16396:2020**

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**SIST-TP CEN/TR 16396:2020**      **en,fr,de**

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## Playground equipment for children - Replies to requests for interpretation of EN 1176 and its parts.

Spielplatzgeräte für Kinder - Antworten auf  
Interpretationsanfragen zu EN 1176 und  
dazugehörigen Teilen

This Technical Report was approved by CEN on 25 November 2019. It has been drawn up by the Technical Committee CEN/TC 136.

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<b>Contents</b>	<b>Page</b>
European foreword.....	4
Introduction .....	5
<b>1 Scope.....</b>	<b>8</b>
<b>2 Normative References .....</b>	<b>8</b>
<b>3 Terms and definitions .....</b>	<b>8</b>
<b>4 EN 1176-1:1 2008, <i>Playground equipment — Part 1: General safety requirements and test method</i> .....</b>	<b>8</b>
4.1 General (interpretation request 2010-09 — SII) .....	8
4.2 Scope (interpretation request 2010-04 SFS) .....	9
4.3 Clause 3.5 (interpretation request 2010-02 SFS).....	10
4.4 Clause 4.2 (interpretation request 2011-02 TSI) .....	11
4.5 Clauses 4.2.4; 4.2.4.4 (interpretation request 2011-04 SNV) .....	13
4.6 Clause 4.2.4.4 (interpretation request 2010-01 SFS).....	14
4.7 Clause 4.2.9.2 (Interpretation request 2011-07 — DS).....	14
4.8 Clause 3.1.9 Cluster (EN 1176-1), Clause 4.2.8.3 Free Space (EN 1176-1) and EN 1176-3, 4.7 (interpretation request 2011-10 ASI) .....	15
4.9 Clause 4.2.7.2 (interpretation request 2011-11 DS) .....	17
4.10 Clause 4.2.7.2 a) and b) and Annex D (interpretation request 2009-09 SN) .....	18
4.11 Clause 4.2.7.3 (interpretation request 2011-03 - SNV) .....	20
4.12 Clause 4.2.8.1 Table 2 (interpretation request 2009-04 AFNOR) .....	20
4.13 Clause 4.2.8.1 Figure 14 (interpretation request 2009-05 AFNOR) .....	21
4.14 Clause 4.2.8.4 (interpretation request 2009-06 DS) .....	22
4.15 Clause 4.2.8.5.2 (interpretation request 2011-12 DIN) .....	22
4.16 Clause 4.2.8.5.2 (interpretation request 2010-07 DIN) .....	24
4.17 Clause 4.2.8.5.3 (interpretation request 2010-03 SFS) .....	25
4.18 Clause 4.2.7.1 and 4.2.7.2 (interpretation request 2011-13 DS) .....	25
4.19 Clauses 3.29, 4.2.8.4 and 4.2.8.5.4 (interpretation request 2012-01 BSI).....	26
4.20 Clause 4.2.7.2 (interpretation request 2012-02 SFS).....	27
4.21 Clause 4.2.7.2 a) and b) and Annex D (interpretation request 2009-09 SN) .....	28
4.22 Part 1 Clause 4.2.7.2 and Part 2 Clause 4.5(interpretation request 2014-06 DS) .....	30
4.23 Clause 4.2.7.3 (interpretation request 2011-03 SNV) .....	32
4.24 Clause 4.2.8.1, Table 2 (interpretation request 2009-04 AFNOR) .....	32
4.25 Clause 4.2.8.1, Figure 14 (interpretation request 2009-05 AFNOR) .....	33
4.26 Clause 4.2.8.1 and 4.3 + EN 1176-11 (interpretation request 2014-03 NL) .....	34
4.27 Clause 4.2.8.4 (interpretation request 2009-06 DS) .....	38
4.28 Clause D.2.2 (interpretation request 2016-01 CEN/TC52).....	38
4.29 Clause 4.2.8.1, EN 1176-1 (interpretation request 2016-03 NEN) .....	41
4.30 Clause 4.2.4.4 (Interpretation request 2016-04 SK) .....	44
4.31 EN 1176-1 + EN 1176-2 (interpretation request 2016-07 DS) .....	47
4.32 Clause 4.2.3 (interpretation request 2016-08 DS).....	48
4.33 Clause 4.2.3 EN 1176-2 (interpretation request 2016-09 DS).....	48
4.34 Clause 4.2.7.2 (interpretation request 2017-01 BSI).....	49
4.35 Clause 4.2.6 and 4.2.7.4 (interpretation request 2017-03 SN) .....	50
4.36 Clause 4.2.8.1 (interpretation request 2017-05 SN) .....	53
4.37 Clause 4.2.7.2 and EN 1176-5, 4.4 (interpretation request 2017-07 LVS).....	55
4.38 Clause 4.2.2.8.2.5 (interpretation request 2017-08 NEN).....	56

4.39	Clause 4.2.3 s (interpretation request 2017-09 NEN) .....	57
5	<b>EN 1176-2:2008, <i>Playground equipment and surfacing — Part 2: Additional specific safety requirements and test methods for swings</i></b> .....	58
5.1	Clause 4.2 (interpretation request 2010-06 DS) .....	58
5.2	Clause 4.9 Framework (interpretation request 2011-08 DS) .....	59
5.3	Clause 4.10.1 (interpretation request 2010-05 DS) .....	60
5.4	Clause 4.10.2.1 (interpretation request 2011-09 DS) .....	60
5.5	Clause 4.10.2 (interpretation request 2017-02 BSI) .....	61
5.6	Clause 3.9 and Figure 6 (interpretation request 2017-06 CEN/TC/SC 1/TG 1 “Rationales Group”) .....	62
5.7	Annex B (interpretation request 2011-06 DS) .....	63
6	<b>EN 1176-3:2008, <i>Playground equipment — Part 3: Additional specific safety requirements and test methods for slides</i></b> .....	64
6.1	Clause 4.2 (interpretation request 2011-05 SIS) .....	64
6.2	Clause 4.2 and 4.3.4, Figure 1 (interpretation request 2014-04 SIST) .....	65
6.3	Clause 4.9.2 (interpretation request 2016-10 DS) .....	66
7	<b>EN 1176-4:2008, <i>Playground equipment — Part 4: Additional specific safety requirements and test methods for cableways</i></b> .....	68
7.1	Clause 4.5 (interpretation request 2009-01 DS) .....	68
8	<b>EN 1176-6:2008, <i>Playground equipment — Part 6: Additional specific safety requirements and test methods for rocking equipment</i></b> .....	68
8.1	Clause 4.9 (interpretation request 2014-05 NBN) .....	68
8.2	Clause 4.10 (interpretation request 2016-02 NEN) .....	69
8.3	Clause 4.6 (interpretation request 2009-07 DS) .....	70
8.4	Clause 4.10 (interpretation request 2009-08 DS) .....	71
8.5	Table 1 (interpretation request 2010-08 CEN/TC 136/SC 1/TG 1 “Rationales Group”) ....	71
9	<b>EN 1176-10:2008, <i>Playground equipment — Part 10: Additional specific safety requirements and test methods for fully enclosed play equipment</i></b> .....	71
9.1	Clause 4.3.7 (interpretation request 2009-02 DS) .....	71
9.2	Clause 4.3.7 (interpretation request 2014-01 NL) .....	72
9.3	Clause 4.4.2.4 (interpretation request 2009-03 DS) .....	73
9.4	Clause 7 + EN 1176-1 (interpretation request 2014-02 NL) .....	74
9.5	Clause 4.2.7.6 (interpretation request 2016-05 CYS) .....	75
10	<b>EN 1176-11:2008, <i>Playground equipment and surfacing — Part 11: Additional specific safety requirements and test methods for spatial network</i></b> .....	76
10.1	Scope, signage (interpretation request 2011-01 ASI) .....	76

**CEN/TR 16396:2020 (E)****European foreword**

This document (CEN/TR 16396:2020) has been prepared by Technical Committee CEN/TC 136 “Sports, playground and other recreational facilities and equipment”, the secretariat of which is held by DIN.

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

This document supersedes CEN/TR 16396:2012.

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## Introduction

### Interpretations and no-action decisions

This document contains all interpretation of TR 16396 to the end of 2017. It should bring a close to all interpretations made to the 2008 version of EN 1176 and all of its specific parts that were also revised in 2017. It contains replies to requests for interpretations concerning the understanding of clauses in the 2008 edition of EN 1176 series. 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. However, following an interpretation gives assurance that the relevant clause of the standard has been correctly applied. An interpretation is a clarification of the meaning of the standard. This TR covers requests from 2011 to the end of 2017.

### Disclaimer

The interpretations have been prepared by the interpretation panel of CEN/TC 136/SC1 committee according to agreed process and finally confirmed by the whole SC1 committee prior to responding back to the enquiring National Standard Body. The information contained herein should always be considered in association with the original 2008 edition of EN 1176 series published text.

Requests for interpretations may be submitted by a CEN member body through its national committee or by a CEN/TC 136 liaison (but not directly by an individual or a company) – in accordance with the interpretation protocols agreed by CEN/TC 136/SC 1. The requests are then channelled to the CEN/TC 136/SC 1 interpretation panel, which will then deal with the request.

A request for an interpretation may lead to:

- a) *an interpretation of the standard with no action to the standard (no revision and no amendment)*

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.

This is also applicable when it is agreed that the standard appropriately specifies how playground equipment shall be assessed.

- b) *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 16396 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) *a future revision*

It is not within the interpretation protocol to carry out new work that was not previously covered within the published EN 1176 series parts and clauses. Future work requests should always be raised by National Standard Bodies using the “Future work request template” to ensure full

**CEN/TR 16396:2020 (E)**

consideration is given to the necessity and possible consequences, before starting any new work on EN 1176 series.

**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.

The following information requests have been included in this Technical Report:

**2009**

2009-01 DS — Part 4 — 4.5

2009-02 DS — Part 10 — 4.3.7

2009-03 DS — Part 10 — 4.4.2.4

2009-04 AFNOR — Part 1 — 4.2.8.1 Table 2

2009-05 AFNOR — Part 1 — 4.2.8.1 Figure 14

2009-06 DS — Part 1 — 4.2.8.4

2009-07 DS — Part 6 — 4.6

2009-08 DS — Part 6 — 4.10

2009-09 SN — Part 1 — 4.2.7.2 a) and b) and Annex D

**2010**

2010-01 SFS — Part 1 — 4.2.4.4

2010-02 SFS — Part 1 — 3.5

2010-03 SFS — Part 1 — 4.2.8.5.3

2010-04 SFS — Part 1 — Scope

2010-05 DS — Part 2 — 4.10.1

2010-06 DS — Part 2 — 4.2

2010-07 DIN — Part 1 — 4.2.8.5.2

2010-08 CEN/TC 136/SC 1/TG 1 “Rationales group” — Part 6 — Table 1

2010-09 SII — Part 1 — General

**2011**

2011-01 ASI — Part 11 — Scope Signage

2011-02 TSI — Part 1 — 4.2

2011-03 SNV — Part 1 — 4.2.7.3

2011-04 SNV — Part 1 — 4.2.4 and 4.2.4.4

2011-05 SIS — Part 3 — 4.2

2011-06 DS — Part 2 — Annex B

2011-07 DS — Part 1 — 4.2.9.2

2011-08 DS — Part 2 — 4.9

2011-09 DS — Part 1 — 4.10.2.1

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2011-10 ASI — Part 1 — 3.19, 4.2.8.3 + Part 3 Clause 4.7

2011-11 DS — Part 1 — 4.2.7.2

2011-12 DIN — Part 1 — 4.2.8.5.2

2011-13 DS — Part 1 — 4.2.7.1, 4.2.7.2

2012

2012-01 GB — Part 1 — 3.29, 4.2.8.4, 4.2.8.5.4

2012-02 SFS — Part 1 — 4.2.7.2

2014

2014-02 — NEN — Part 1 7.1 + Part 10 Clause 7

2014-03 — NEN — Part 1-4.2.8.1 and Part 11 Clause 4.3

2014-04 — SIST — Part 3 -4.2, 4.3.4 Figure 1

2014-05 — NBN — Part 6, 4.9

2014-06 — DS — Part 1- 4.2.7.2 + Part 2 — 4.5

**2016**

2016-01 — CEN/TC52

2016-02 — NEN — Part 6

2016-03 — NEN — Part 1 and Part 3

2016-04 — SK — Part 1

2016-05 — CYS — Part 10

2016-06 — was cancelled and updated as 2016-09

2016-07 — DS — Part 1 and Part 2

2016-08 — DS — Part 1

2016-09 — DS — Part 1 and Part 2

2016-10 — DS Part 3

**2017**

2017-01 GB — Part 1

2017-02 GB — Part 2

2017-03 SN — Part 1

2017-04 SN — Part 1

2017-05 SN — Part 1

2017-06 CEN/TC 136/SC 1/ TG 1 “Rationales group” — Part 2

2017-07 LVS — Part 1

2017-08 NEN — Part 1

2017-09 NEN — Part 1

NOTE ASI - Austria, DS - Denmark, SFS - Finland, AFNOR - France, DIN - Germany, SII - Israel, LVS - Latvia, NBN - Belgium, NEN - Netherlands, SN - Norway, SIS - Sweden, SIST - Slovakia, SN - Switzerland, TSI - Turkey, GB - United Kingdom.

## CEN/TR 16396:2020 (E)

### 1 Scope

The purpose of this document is to publish replies to requests for interpretations, to all parts of EN 1176 series, which have been drafted by the interpretation panel and confirmed by CEN/TC 136/S C1 “Playground equipment for children”.

### 2 Normative References

There are no normative references in this document.

### 3 Terms and definitions

No terms and definitions are listed in this document.

ISO and IEC maintain terminological databases for use in standardization at the following addresses:

- IEC Electropedia: available at <http://www.electropedia.org/>
- ISO Online browsing platform: available at <http://www.iso.org/obp>

### 4 EN 1176-1:2008, *Playground equipment and surfacing* — Part 1: *General safety requirements and test method*

#### 4.1 General (interpretation request 2010-09 – SII)

##### Question

1. We would appreciate a formal answer from the TC 136/WG in relation to how to test the “rope carousel” and to provide an explanation for the rationale for testing them only according to EN 1176-1 and not according to EN 1176-5?
2. During that period our WG discussed the EN 1176-1:2008 standard and now have a few questions:
  - a) We need to obtain the position regarding the criteria for fire resistance of playground equipment placed mainly in open areas.
  - b) We need to obtain an explanation as to why the instructions for tests of playground equipment in accordance with EN 1021 series have been deleted.
  - c) Why are there no clear instructions besides the regulations of the countries as to where the equipment is assembled?
3. We are also involved with musical playground equipment (see attached photographs). Would the requirements of EN 1176-1 be applicable to some of them? Which types would be covered by EN 1176-1 and which would not? Is there any restriction to placing them in an area together with other playground equipment?

##### Reply

##### No action/interpretation

1. A picture of the specific product would be required to make a formal judgement.

EN 1176-1, 4.2.1 confirms; “Equipment where the primary play function is augmented by a secondary motion, e.g. rocking and/or rotating, shall conform to the additional parts of EN 1176

relating to both play functions, as appropriate, unless the equipment is specifically covered in just one of the additional parts of EN 1176.”

EN 1176-5, scope confirms; “This document is not applicable to equipment where the main play function is not rotating”.

2. Contained Playground Equipment has the greatest risk and these requirements are now covered in the new EN 1176-10. Other than this the greatest risk is from materials that produce a surface flash effect and would not give time for users to leave the area.
  - a) EN 1021 series was no longer thought to be necessary as a general requirement but is still referred to in EN 1176-10.
  - b) All countries have different National Regulations, from which no universal requirements could be identified.
3. There are no specific requirements in EN 1176 series for “Musical” Playground Equipment. However, EN 1176-1 provides a basis for assessing all types of Playground Equipment. The judgement of when and how much of this specification to apply not only relates to the type of product, but also to where it is provided. In an unsupervised/free access situation, together with other Playground Equipment items, then some assessment to EN 1176 series may be helpful.

#### **Comments:**

**Question 1:** Future work required to determine what is relevant for this specific type of product. This would need to be determined by risk assessment.

**Questions 2 and 3:** No further action required.

#### **4.2 Scope (interpretation request 2010-04 SFS)**

##### **Question**

**Question 1:** How high should the fence be, if it is used as the sole means of separating the playground from the exercise area?

**Question 2:** If distance alone is used as means of separating the playground from the exercise area, how long should this distance be?

**Question 3:** Can you give any other example of what other means of separating these areas there could be?

##### **Reply**

##### **No action/interpretation**

The interpretation panel recommend work is started, as a priority, for exercise equipment of this type as it is now being specified in most European countries, in association with children’s playground equipment.

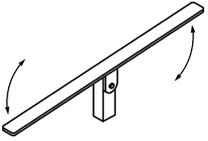
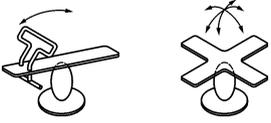
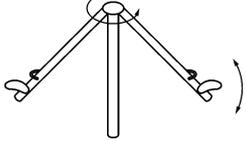
The panel advises that when products of this type are installed in association with children’s playground equipment it will get used by children, whether intentional or not, because segregating by fencing, for example, does not work as a solution. Therefore, this type of equipment should be designed and provided without unacceptable risks to these children, and comply with relevant requirements in EN 1176 series, e.g. according to test protocols from accredited test houses, until a new standard is developed.

## CEN/TR 16396:2020 (E)

## 4.3 Clause 3.5 (interpretation request 2010-02 SFS)

**Question**

3.5 explains that forced movement is “e.g. sliding, swinging, rocking”. Different rocking equipment provides different types of movement. This is expressed in the table below:

	Type 1 and 6	Type 2-4	Type
Product example			
Movement type	Up-down	Slow and short horizontal movement	Rotation with vertical movement
Length of movement	60 cm - 130 cm	20 cm - 40 cm	infinite
Movement speed	Free fall down is possible	Slow	Potentially fast

It is obvious that there is a distinction between different “rocking” movements.

**Question 1:** Are types 2-4 rocking equipment intended to require free space like in 3.5?

4.2.8.2.5, third paragraph: “In most cases there may be overlapping of falling spaces including impact areas. Unless specified in other parts of this standard, overlapping of the *falling space where forced movement exists should not occur.*”

**Question 2:** Are types 2-4 rocking equipment intended to be installed without overlapping falling space as in 4.2.8.2.5?

**Reply****No action/interpretation****Answer to the question 1:**

The definition for Free Space in EN 1176-1:2008 point 3.5 refers to “Rocking Equipment”.

In addition, in 4.2.8.5.2, first paragraph, there is a clear reference to rocking equipment as having forced movement (thus free space).

As no exceptions are given in EN 1176-6 it applies to all types of rocking items.

Additionally during the 2008 revision, changes were made to the requirements for a tested surface to be provided. Part of these discussions assumed that small rocking items, such as type 2a, had a forced movement/free space to ensure they were required to have an impact attenuating surface in accordance with EN 1176-1.

**Answer to the question 2:**

Yes, types 2 – 4 rocking equipment are intended to be installed without overlapping falling space according to EN 1176-1, 4.2.8.2.5, third paragraph, as there is no exception in Part 6.

However, please also see EN 1176-6, 4.10; This allows the Falling Space for rocking equipment types 1, 2, 3 and 4, to be reduced to a minimum of 1m, from the general requirements in EN 1176-1.

**Comments:**

Risks associated with a closer separation/proximity of single-user rockers, such as type 2a, are much less than for multiuser types as that single user has a far higher level of control. A closer separation

distance for Rocking Equipment, of this type, could be considered, as an exemption, as future work. This would need to be carefully considered to the existing requirements of EN 1176-1, 4.2.8.2.

We would recommend that specific types of Rocking Equipment complying with EN 1176-6 should be exempt from the restriction in EN 1176-1, not to overlap Falling Spaces (should be confirmed by risk assessment). This would still enforce that they include some forced movement, but acknowledges it to be of a small, lower risk, amplitude.

#### **4.4 Clause 4.2 (interpretation request 2011-02 TSI)**

##### **Question**

Is the product seen in the photos suitable for 4.2 of EN 1176-1?

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