

SLOVENSKI STANDARD

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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 - 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

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ICS:

97.200.50 Igrače Toys

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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 19 April 2021. It has been drawn up by the Technical Committee CEN/TC 52.

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EUROPÄISCHES KOMITEE FÜR NORMUNG

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

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European foreword

This document (CEN/TR 15371-1:2021) 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 shall not be held responsible for identifying any or all such patent rights.

This document supersedes CEN/TR 15371-1:2017.

Some of the previous interpretations and no action decisions have been deleted or modified, as due to amendments to the corresponding EN 71 standards, answers have become obsolete.

CEN/TR 15371, *Safety of toys — Interpretations*, is currently composed of 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 document contains replies to requests for interpretations concerning the understanding of clauses in EN 71-1:2014+A1:2018, EN 71-2:2020, EN 71-8:2018 and EN 71-14:2018. 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 document is to provide replies to requests for interpretations of EN 71-1:2014+A1:2018, *Safety of toys — Part 1: Mechanical and physical properties*, EN 71-2:2020, *Safety of toys — Part 2: Flammability*, EN 71-8:2018, *Safety of toys — Part 8: Activity toys for domestic use* and EN 71-14:2018 and *Safety of toys — Part 14: Trampolines for domestic use*.

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 <https://www.iso.org/obp>

4 EN 71-1:2014+A1:2018, *Safety of toys — Part 1: Mechanical and physical properties*

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4.1 3.6 Ball (interpretation)

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Question

<https://standards.iteh.ai/catalog/standards/sist/a0481b74-b0a0-4e9d-a47d-5c827a2eb85a/sist-tp-cen-tr-15371-1-2021>

The definition of a ball according to 3.6 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?

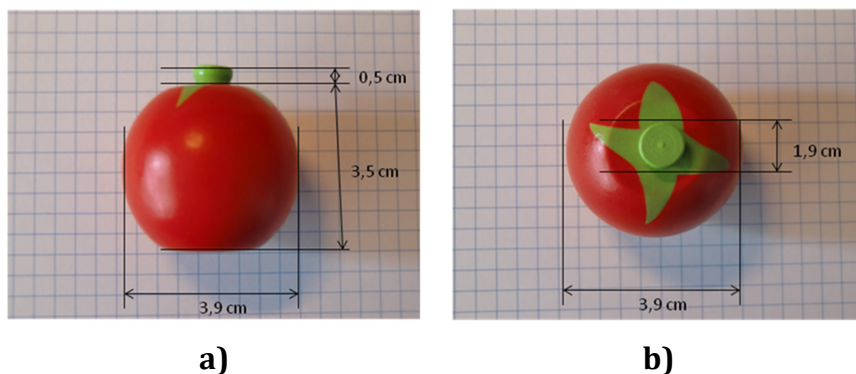


Figure 1

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

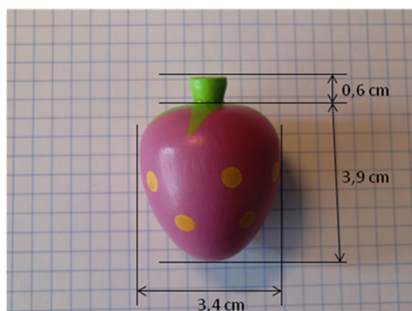


Figure 2

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



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Figure 3

<https://standards.iteh.ai/catalog/standards/sist/a0481b74-b0a0-4e9d-a47d-5c827a2eb85a/sist-tp-cen-tr-15371-1-2021>

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)

4.2 3.13 Cord (no action decision)

Question

The question relates to 3.13 “cord” of EN 71-1:2014+A1:2018.

The standard defines cord as:

“narrow piece of flexible textile or non-textile material of which the length is significantly greater than its thickness and width

EXAMPLES Examples of *cords* include *elastic material*, monofilament polymeric material, *tape*, *ribbon*, *rope*, *strap*, woven and twisted material and string as well as certain weak and long *springs*”

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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 4 and the toy of Figure 6 are soft filled, while the tail of Figure 5 is not soft filled, therefore 5.4 is applicable only to the tail of Figure 5. 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 5 is considered a cord because there is not stuffing material inside.

REQ 104-12 (UNI, Italy)

4.3 3.36 Fuzz (no action decision)**Question**

The question relates to 3.36 “fuzz” of EN 71-1:2014+A1:2018.

Some soft filled toys may have fur with long hair, even longer than 50 mm. We do not know if such hair is considered as monofilament fibre.

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



Figure 7

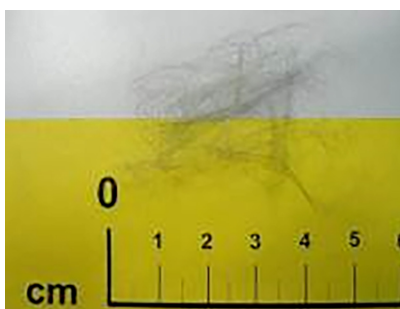


Figure 8

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)

4.4 3.38 Hinge line and 4.10.3 Hinges (no action decision)**Question**

A toy truck has a hinged container. The container opens and closes similar to a lid or door. The weight of the container is more than 250 g. There is a gap along the hinge line where a 5 mm rod can be inserted, but it does not allow the 12 mm rod to be inserted when closing the container.

Is the gap shown in the red rectangle a hinge line as defined in 3.38?

Is 4.10.3 applicable?



Figure 9



Figure 10

The location of the hinge is indicated below with red dots:



Figure 11

[SIST-TP CEN/TR 15371-1:2021](https://standards.itech.ai/catalog/standards/sist/a0481b74-b0a0-4e9d-a47d-5c827a2eb85a/sist-tp-cen-tr-15371-1-2021)

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Reply

Standard is clear. 3.38 of EN 71-1:2014+A1:2018 defines a hinge line as:

“line along or parallel to the line projected through the axis of rotation...”

The line in the red rectangle as described in the above pictures is parallel to the line projected through the axis of rotation and is therefore considered as a hinge line. 4.10.3 of EN 71-1:2014+A1:2018 applies.

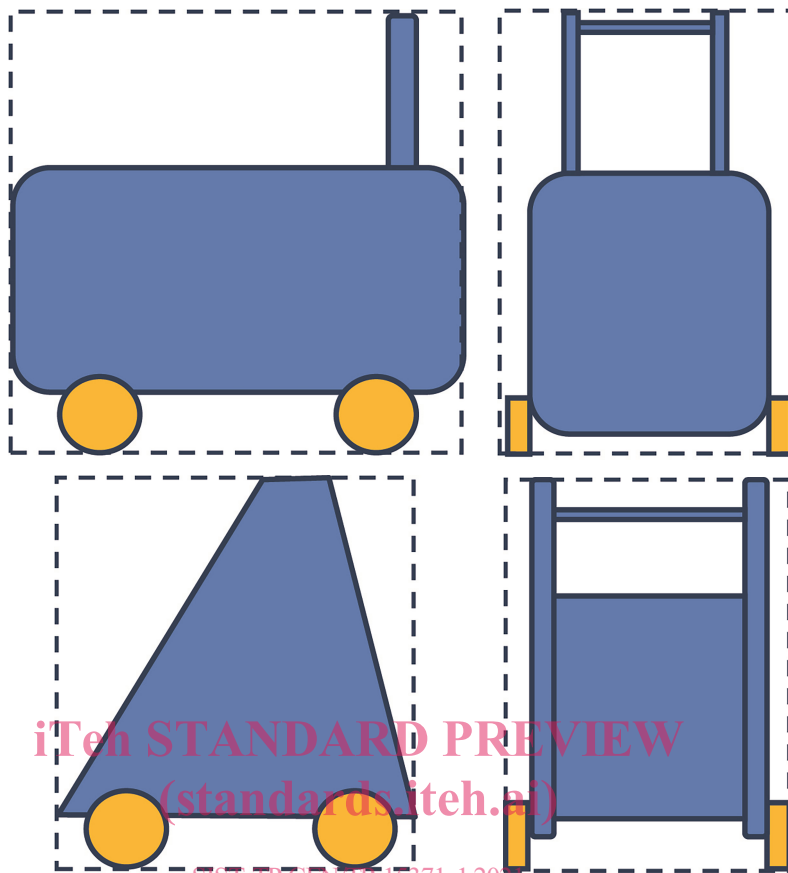
REQ 160-18 (NEN - Netherlands)

4.5 3.39 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+A1:2018?

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

Option A: global volume calculation

Option B: follow the shape to calculate volume

