SLOVENSKI STANDARD
kSIST-TP FprCEN/TR 16411:2021

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Izdelki za otroke - Zbrane interpretacije standardov CEN/TC 252

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

Artikel für Säuglinge und Kleinkinder - Gesammelte Interpretationen der CEN/TC 252-Normen

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

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

Articles de puériculture ¿ compilation des interprétations des normes du CEN/TC 252

Artikel für Säuglinge und Kleinkinder - Gesammelte Interpretationen der CEN/TC 252-Normen

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

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European foreword

This document (FprCEN/TR 16411:2021) 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 16411:2019.

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.

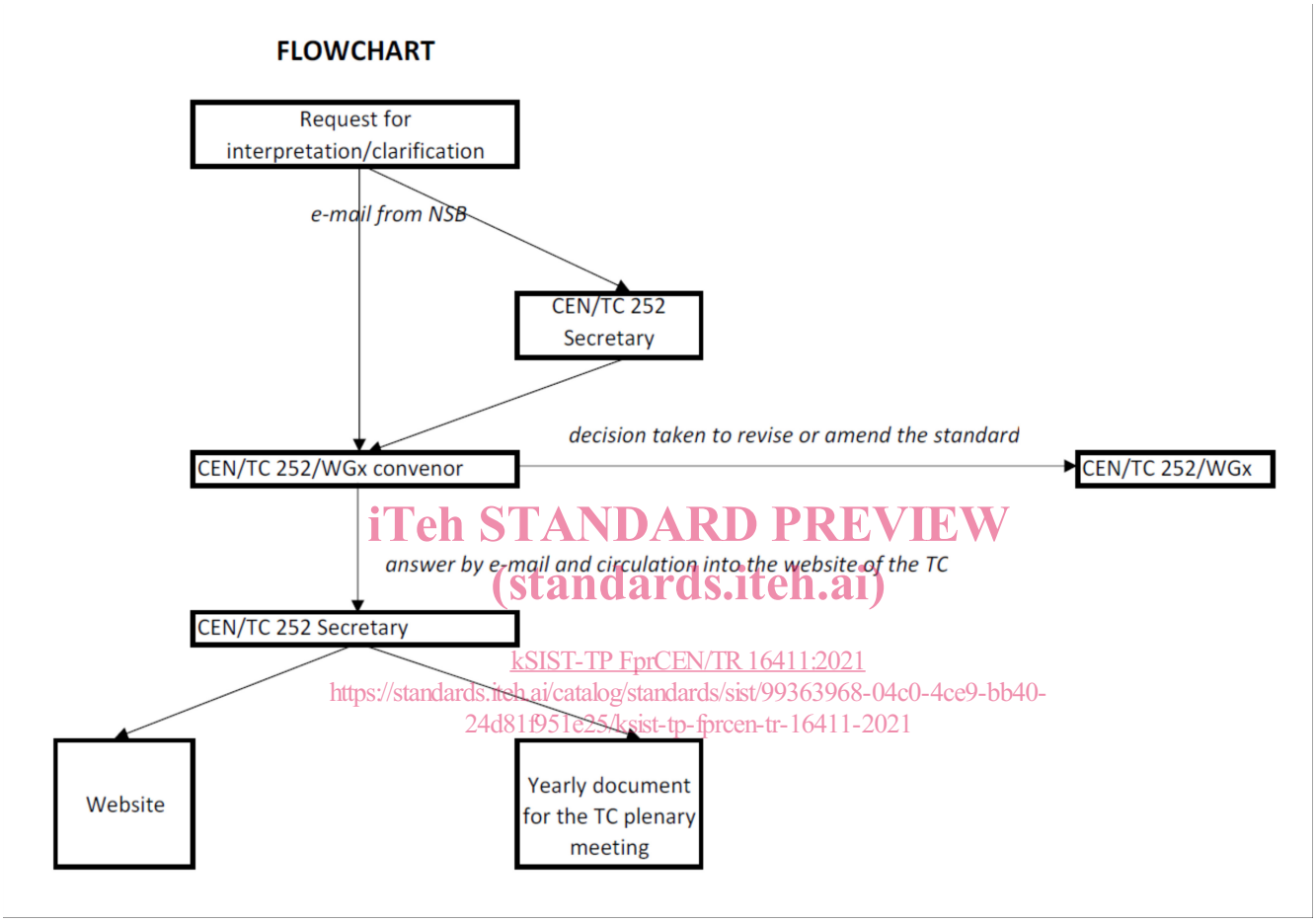

Figure 1

1 Scope

The purpose of this document 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 1888-1:2018, *Child care articles - Wheeled child conveyances - Part 1: Pushchairs and prams*;

— 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 16120:2012+A2:2016, *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.*

— EN 17022:2018, *Child care articles - Bathing aids - Safety requirements and test methods*;

— EN 17072:2018, *Child care articles - Bath tubs, stands and non-standalone bathing aids - Safety requirements and test methods*;

— EN 12586:2007+A1:2011, *Child care articles - Soother holder – Safety requirements and test methods*;

— EN 14350:2020, *Child care articles – Drinking equipment - Safety requirements and test methods*;

— EN 13209-1:2004, *Child use and care articles - Baby carriers - Safety requirements and test methods - Part 1: Framed back carriers*;

— EN 13209-1:2021, *Child care articles - Child carriers - Safety requirements and test methods - Part 1: Framed back carrier.*

2 Normative References

There are no normative references in this document.

3 Terms and definitions

No terms and definitions are listed in this document.

4 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		2/2014
8	Packaging	3/2019

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.	

N°	Clause/ Subclause/ Annex	Paragraph/ Figure/ Table/Note	Question	Reply
2	6.6.2.3		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).  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. 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?	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.

N°	Clause/ Subclause/ Annex	Paragraph/ Figure/ Table/Note	Question	Reply
3	8		The following wording (highlighted in red) has caused a problem with a laboratory which insists that all bags, including screw bags of 50mm, must be marked with the warning in all languages: ***8 Packaging*** *Bags made of flexible plastics which are used for packaging and which have an opening perimeter greater than 380 mm, shall have an average sheet thickness of not less than 0,038 mm, and their means of closing shall not be drawstring or cord. The average thickness shall be determined from measurements taken at 10 places on the diagonal of a sample sheet.* *The requirements for thickness does not apply to the following:* *a) shrunk-on film packaging, which is normally destroyed when the packaging is opened by the user;* *b) bags made of perforated film, which makes it possible for the child to breathe through the film, and which is unable to form a vacuum and stick to the face of the child. To comply with this requirement any area of maximum dimensions 30 mm x 30 mm shall have a minimum hole area of 1 %.* ***All bags** shall be conspicuously marked with:* ***WARNING — Keep covering away from children to avoid suffocation.***	The term All bags should be read as referring to all bags mentioned in the first paragraph of this clause, i.e. bags made of flexible plastics which are used for packaging and which have an opening perimeter greater than 380 mm. To avoid possible interpretation issues the clause has been revised in the draft of the revised standard currently in Enquiry stage to align with the most recent approach given in TR 13387-3.

5 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°
4.2	Principle of the most onerous condition	19/2018
8.4		17/2018
8.5	Choking and ingestion hazards	14/2017 18/2018
8.5.2.3	Bite test	16/2017
8.10.3 & 8.10.6	8.10.3 Irregular surface test 8.10.6 Handle strength	19/2018
10.3	Purchase information	20/2018

Table 4 — Table of the request for interpretation/clarification for EN 1888:2012

N°	Clause/ Subclause/ Annex	Question	Reply
14	8.5	Following label would be tested according to Torque test and Tensile test by some accredited labs, but according to others it's excepted from this requirement. Depending on material of the label, but criteria test or not test are not clear. Herewith the interpretations we received: 1. NO TEST because it's made of fabric: Quotation Lab A: "This kind of labels are usually made of fabric; we do not consider fabric as posing choking hazard (such as in EN71-1 on toys) and we do not test them. If your label is covered with plastic however, we will test it as a small part"	The current standard does not exclude any kind of material from the requirement. Therefore, all types of labels shall be tested, even if made of paper, fabric or any permeable material. The question will be raised to TC252/WG6 for a common approach on this issue which concerns all childcare articles standards.

N°	Clause/ Subclause/ Annex	Question	Reply
		2. TEST Depends on permeability Quotation Lab B: “we use test method for fabric permeability evaluation like defined in EK2 AK2.2 for toys (see below) « If a drop of water is not entirely soaked up after 10 seconds, the “fabric” is considered as not enough permeable and is considered as hazardous small part.” 	
16	8.5.2.3	How to interpret “pinch the materials of the bumper bar between finger and thumb and attach the bite tester…” Our understanding is that clause explicitly requires the tester to pinch the materials between the thumb and forefinger and then apply the bite tester. We have experience with labs that only use the bite tester to determine the “smallest amount” and they do this by opening the bite tester slightly and then pushing it into the material until a small amount of material is between the teeth after which they close the tester and perform the test. We believe that this method is both not realistic and in non-conformance with the test method. Additionally, we have experience with labs that do perform this method according to our interpretation which causes confusion and inconsistency. We would like to know what the commission says and how this method should be interpreted.	This interpretation is correct. The standard clearly says that the materials shall be pinched between thumb and forefinger. The method used by the laboratory is not correct. This method has been developed and validated by the TC252/WG6 and introduced in all relevant standards.

N°	Clause/ Subclause/ Annex	Question	Reply
17	8.4	We are asking in prEN 1888-1 to look also for cords and loops which originate outside of the occupant space but can be brought inside the occupant space by pulling them with a force of 25N. Is the intention of this requirement to fail stroller bags like these two represented below (imagine the first picture with the seat unit instead of the carry cot)? If we want to keep the measurement approach, shouldn't we define that if the strap is larger than xx mm than it is not to be considered a cord anymore? In fact we speak about narrow fabrics in 8.4.1, but we do not give any specification of what narrow means… Can we please discuss this during the next WG3 meeting in June?  	No it was not the intention of the working group to consider and fail such handles. The main reason is that they are not part of the product.