PD CEN/TR 15371-1:2021



BSI Standards Publication

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

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National foreword

This Published Document is the UK implementation of CEN/TR 15371-1:2021. It supersedes PD CEN/TR 15371-1:2017, which is withdrawn.

The UK participation in its preparation was entrusted to Technical Committee CW/15, Safety of toys.

A list of organizations represented on this committee can be obtained on request to its committee manager.

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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

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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.

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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

4.1 3.6 Ball (interpretation)

Question

The definition of a ball according to 3.6 is:

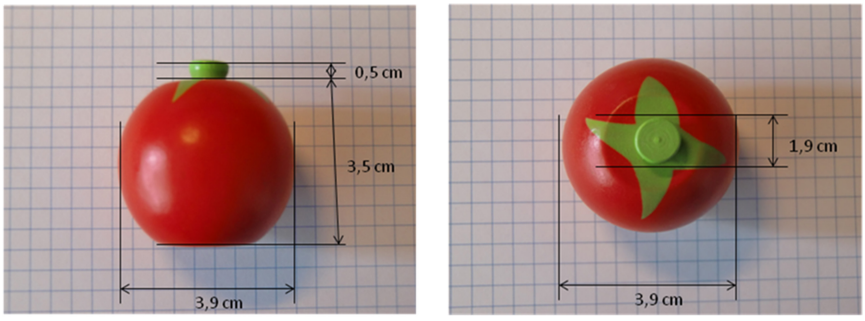
“Spherical, ovoid or ellipsoidal object, usually but not always designed or intended to be thrown, hit kicked, rolled, dropped or bounced”.

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?



a) **b)**

Figure 1

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

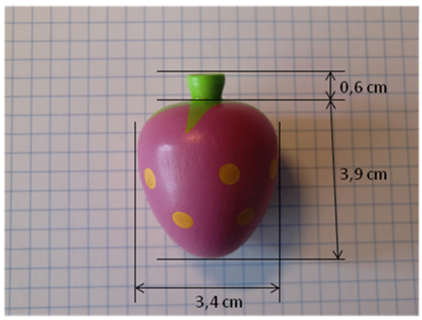


Figure 2

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

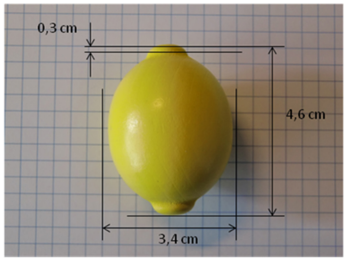


Figure 3

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)

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

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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

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



Figure 11

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)

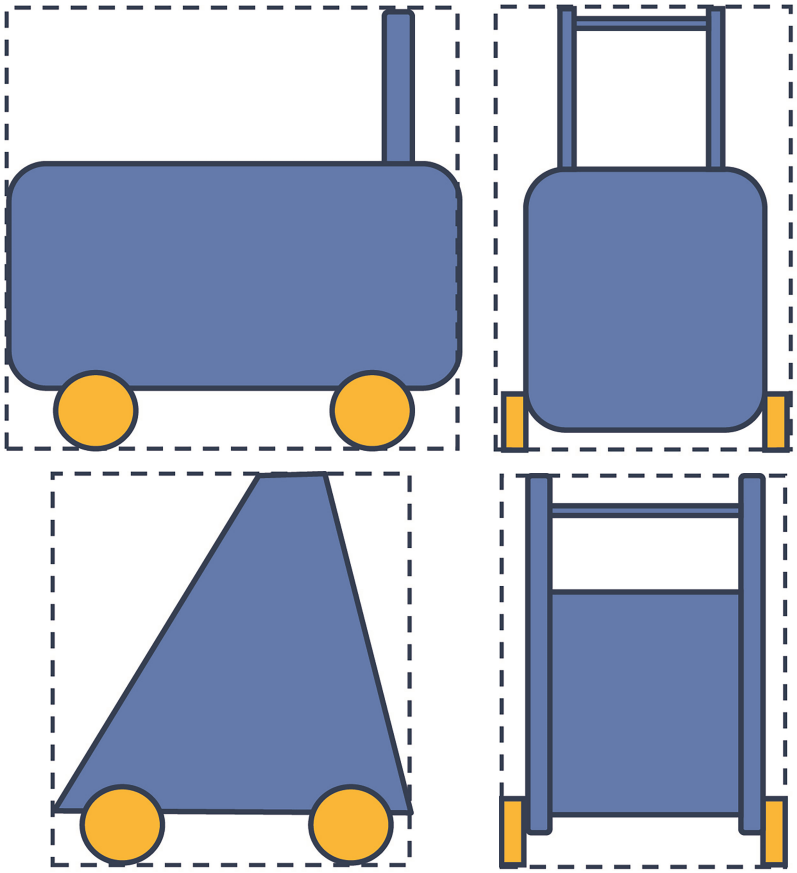
Question

How do you measure the volume of large and bulky toys as defined in 3.33 of EN 71-1:2014+A1:2018?

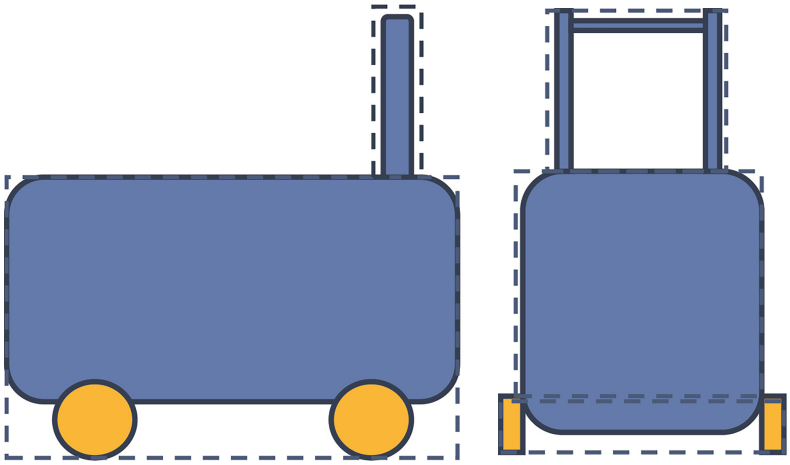
Here are two possible ways. Option A or Option B (see drawings below)?

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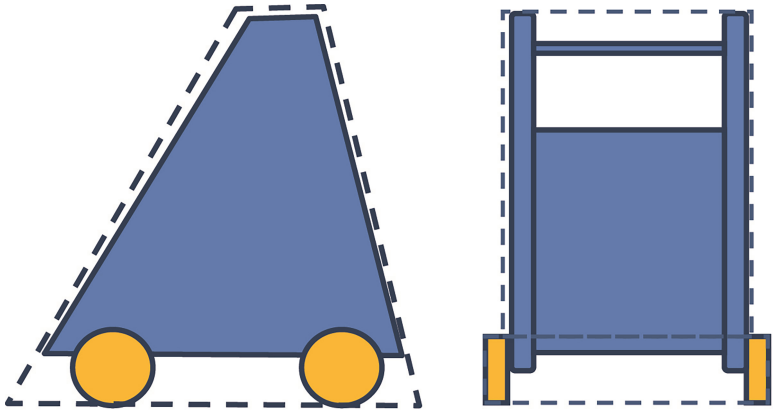
OptionA: global volume calculation



Option B : follow the shape to calculate volume



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Toy 1

Figure 12

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)

4.6 3.54 and 3.55 Projectile toys (no action decision)

Question

EN 71-1 has the below definitions of projectiles with or without stored energy:

3.54

projectile toy with stored energy

toy with a *projectile* launched by means of a *discharge mechanism* capable of storing energy independent from the user and incorporating a mechanism

3.55

projectile toy without stored energy

toy with a *projectile* launched by the energy imparted by the user or by any means of a *discharge mechanism* incapable of storing energy independent of the user

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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 3.55. However, the toy is obviously also not within 3.54 because we interpret 3.54 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 3.55 even if a spring is used in launching the projectile.



Figure 13

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)

4.7 3.54 and 3.55 Projectile toys (no action decision)

Question

a) EN 71-1 defines as projectile an "object intended to be launched, thrown or released into *free flight* or a trajectory in the air"

   1) does this include toys like boomerang or frisbee?

   2) does this include small toys designed in such a way that hitting their base, they make a little jump, rotating on themselves? (to figure them think about a spoon on a table: hitting its extremity you can have it make this kind of jump)

   3) does it include objects launched by catapult toys?

b) If a toy has a spring or an elastic band, but no mechanism to hold the projectile in the "charged" condition (this means that as soon as you release the projectile, it is launched, like in a bow), is it considered "projectile toy with stored energy" (the spring and elastic are considered as discharge mechanisms) or as a "projectile toy without stored energy" (the energy of the projectile depend upon how much the child put the projectile into the toy, like a bow, even if, differently form bows, in this case usually there is an "end of stroke" and the maximum projectile energy is defined)?

Reply

a) 1) Standard is clear those toys are covered by the projectile's definition.

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a) 2) Standard is clear those toys covered by the projectile's definition.

a) 3) Standard is clear those objects are covered by the projectile's definition (the catapults being themselves toys excluded from the scope of EN 71-1).

b) Standard is clear this is a “projectile toy without stored energy” (see 3.55 definition) provided the described item is not regarded as a catapult and therefore enters into the exclusion list as outlined into EN 71-1:2014+A1:2018, Scope.

REQ 076-07 Part 1 (UNI, Italy)

4.8 3.61 Definition of soft filled toys (no action decision)

Question

Is the definition of a soft-filled toy including for example a foam toy (e.g. a so-called squishy or other foam toys made out of one material), which is typically unclothed, with soft body surfaces and filled with a soft material and is compressible with a hand?



Figure 14



Figure 15

Reply

Standard is clear - EN 71-1+ A1 provides the following definitions:

“3.61 soft-filled toy

toy, clothed or unclothed, with soft body surfaces and filled with soft materials, readily allowing compression of the main part of the toy with the hand“

“3.26 filling

material intended to be wholly contained within a *soft-filled toy* or within *soft-filled* parts of a toy“

Since the definition from 3.61 requires a toy is filled with filling to be considered a soft-filled toy, and since the foam toys described in the above request are made of only one soft material, they are not regarded as soft-filled toys for the purpose of the EN 71-1:2014+A1:2018 standard.

REQ 166-19 (DS, Denmark)

4.9 4.9 Protruding parts (interpretation)

Question

An example is given below where wheel axles have been exposed when the wheel has come off. For guidance also some other reference information is given.

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Figure 16

For toys intended for children over 3 years:

Q1: Shall a wheel on a wheel axle (which, if exposed, can present a puncture hazard) be considered to be a protective component and thus subjected to 8.4.2.3 (tension test, protective components)?

Q2: If the answer to question 1 is "Yes", shall the potential puncture hazard of the axle be assessed after removing the axle from the toy and after placing the axle in a reasonably foreseeable position, or shall it be assessed when still in the toy and in a reasonably foreseeable position?

Q3: If the answer to question 1 is "No": Shall any force at all be applied in an effort to remove/detach a wheel from a wheel axle in order to thereafter check the potential puncture hazard presented by the remaining exposed axle?

Reply

Q1: No, it shall not be considered as a protective component since the presence of the wheel is not to protect the end of the axle. Protective components are those which are intended to protect from a potential hazardous protrusion.

Q3: No, according to the standard and for toys for children over the age of 3 years, there is no requirement asking for the application of such a force.

REQ 129-12 (SIS, Sweden)

4.10 4.10.1 c) folding and sliding mechanisms (no action decision)

Question

The below toy is an ironing board made of plastic material with a height of 25 cm. It is intended to be used on a table (child is then standing up) or can also be placed on the ground (the child is sitting in front of the table). The legs of the ironing board are folding ones and present a scissor like action.

Are the requirements from 4.10.1 c) required for this type of toy?

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Figure 17

Reply

Standard is clear, 4.10.1 c) applies since the legs of the ironing board are folding ones and present a scissor like action.

REQ 085-08 (AFNOR, France)

4.11 Mouth-actuated toys and other toys intended to be put in the mouth (interpretation)

Question

Which toys shall be considered as intended to be put in the mouth according to EN 71-1:2014+A1:2018, 4.11?

It is clear that mouth-actuated toys, whistles and peashooters are intended to be put in the mouth but what about other toys like toy cups, toy spoons, toy forks, toy toothbrushes and toy lipsticks as in the following images?

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Figure 18



Figure 19



Figure 20



Figure 21

And what about toys intended to be placed in the doll's mouth but that, for imitation, also the child may put in his mouth (like toy feeding bottle, toy soother, etc.)?



Figure 22



Figure 23



Figure 24

Reply

Toys which are miniatures of real products (e.g. cutlery, feeding bottles, soothers, toothbrush) and intended for use with dolls, etc. are not considered to be intended to be put in the mouth and are not covered by 4.11 requirements.

Toys which are copies of real products and which might be used by children for their real purpose during play are covered by 4.11 requirements if that leads to them being put in the mouth.

Toys which are copies of real products and which are just intended to be put to the lips (e.g. lipsticks, cups) should not be regarded as toys intended to be put in the mouth and are not covered by 4.11 requirements.

REQ 106-12 (UNI, Italy)

4.12 4.14.2 Masks and helmets (no action decision)

Question

1) 4.14.2 of EN 71-1:2014+A1:2018 states about masks the following:

"4.14.2 Masks and helmets

Mask and helmets shall conform to the following requirements:

a) Masks and helmets that fully enclose the head and which are made of impermeable material shall provide a total ventilation area of 1 300 mm^2 or more through at least two holes at least 150 mm apart or through any equivalent single ventilation area."

We understand reading this point that the requirement apply to all types of masks.

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Nevertheless, there are several types of masks in the market according to their design and their material:

Masks that fully enclose the head (generally the area of the face with polymeric flexible material and the rest with textile material with or without hair). Masks that enclose the head but not fully (generally the area of the face with polymeric flexible material and the rest with textile material with or without hair).

Masks that only enclose the face.

The last ones have several designs, ones fit in the form of the face and others are more or less flat and are made of flexible material, polymeric half-rigid material and even cardboard.

Taking into account that establishing the safety requirements to address risks is the target of the standard (in this specific case, the risk of asphyxiation that could happen to the children when using the masks), we have a doubt regarding the below type of masks, which enclose only the face, because it is likely that not all the mentioned masks could present the risk of asphyxiation.

Therefore, there could be masks like the below ones that could not need to fulfil the requirements on 4.14.2 a)



Figure 25



Figure 26



Figure 27

2) Regarding the ventilation area required, we have a doubt about what has to be included in the mentioned area, i.e. does the ventilation area only include the holes at the level of the nose and the mouth, or include the holes at the level of the eyes too?

Reply

1) Requirements in 4.14.2 a) only apply to masks that fully enclose the head and which are made of impermeable material therefore masks that cover the face and for which pictures are given are not covered by this requirement.

2) All holes are to be taken into consideration whatever their position knowing that if only eye, nose and mouth holes were considered the 150 mm requirement would conflict with the normal positioning of those holes for a correct use and should never been fulfilled.

REQ 048-04 (AENOR, Spain)

4.13 4.15.1.2 Warnings and instructions for use (no action decision)

Question

4.15.1.2 indicates:

"Electrically-driven ride-on toys and/or their *packaging*, and their instructions for use, shall carry a warning regarding protective equipment (see 7.10.3). This warning is not required on electrically-driven ride-on toys that are equipped with a seat, and are either covered by the requirement in 4.15.1.4

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or have a maximum design speed of less than 8,2 km/h when tested according to 8.29 (determination of maximum design speed of electrically-driven ride-on toys)."

7.10.3 applies when the electrically-driven ride-on toys are equipped with a seat but are not covered either by the requirement in 4.15.1.4 or have a maximum design speed of less than 8,2 km/h when tested according to 8.29 (determination of maximum design speed of electrically-driven ride-on toys).

Where a toy is not required by the requirement of this clause to bear the warning referenced in 7.10.3, do you remove the reference to protective equipment or the warning as a whole?

Reply

Standard is clear. When the labelling requirement related to protective equipment from 7.10.3 does not apply, the required labelling is:

"Warning. Not to be used in traffic".

REQ 124-12 (BSI, United Kingdom)

4.14 4.15.1.4 Stability (interpretation)

Question

Is the lateral stability test applicable to a two wheels toy motorbike intended for children over 3 years of age, for which removable stabilizers are provided, considering that the toy can be operated by the child when stabilizers are removed?

Reply

This toy shall be considered as toy where the feet of the child can provide sideways stability and therefore excluded from the 4.15.1.4 requirements. The fore and aft stability however remains applicable.

REQ 046-04 (AENOR, Spain)

4.15 4.15.1.4; 8.23.1 Stability (interpretation)

Question (UNI, Italy)

EN 71-1 requires, for the stability test, to "load the toy in the most onerous position with a mass [...] on its standing or sitting surface".

Our interpretation of this requirement is "Load the toy in the most onerous position on the standing or sitting surface, in such a way the mass is perpendicular to the standing or sitting surface and that the vertical projection of the base of the test mass is fully enclosed in the sitting surface. If the standing or sitting surface is narrower than the test mass, the centre of the test mass shall be positioned along the axis of the seat."

Applying this interpretation, a correct position to place the test mass for the front stability is shown in the following pictures (please, do not consider the position of the toy on the inclined plane, it is just an example).

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a) b) c)

Figure 28

If we do not apply this interpretation every laboratory can try to find any improbable sitting surface like in the following examples:



a) b) c)



d) e) f)



g) h) i)

Figure 29

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We consider that all the above examples represent a not correct way to perform the test: in the first row example, the mass is not perpendicular to the sitting surface, in the second and in the third rows, the mass base is outside the sitting surface.

In the third row, someone can argue that the ring allows the placing of the mass without any external support, but if we consider applying this interpretation, we will again have problems. Actually, EN 71-1:2014+A1:2018, Figure 29 does not define the sides of the test mass. Since the test mass does not need to be a perfect cylinder, also the test mass for the dynamic test defined in Figure 32 may be used. Since the position of the test mass on ride on toys with armrest may be significantly influenced (if we agree with this interpretation) by the sides of the test mass, we will have for sure different test results, depending on the kind of the test mass used.



a) **b)** **c)**

Figure 30

We can also have even more improbable test conditions like the following:



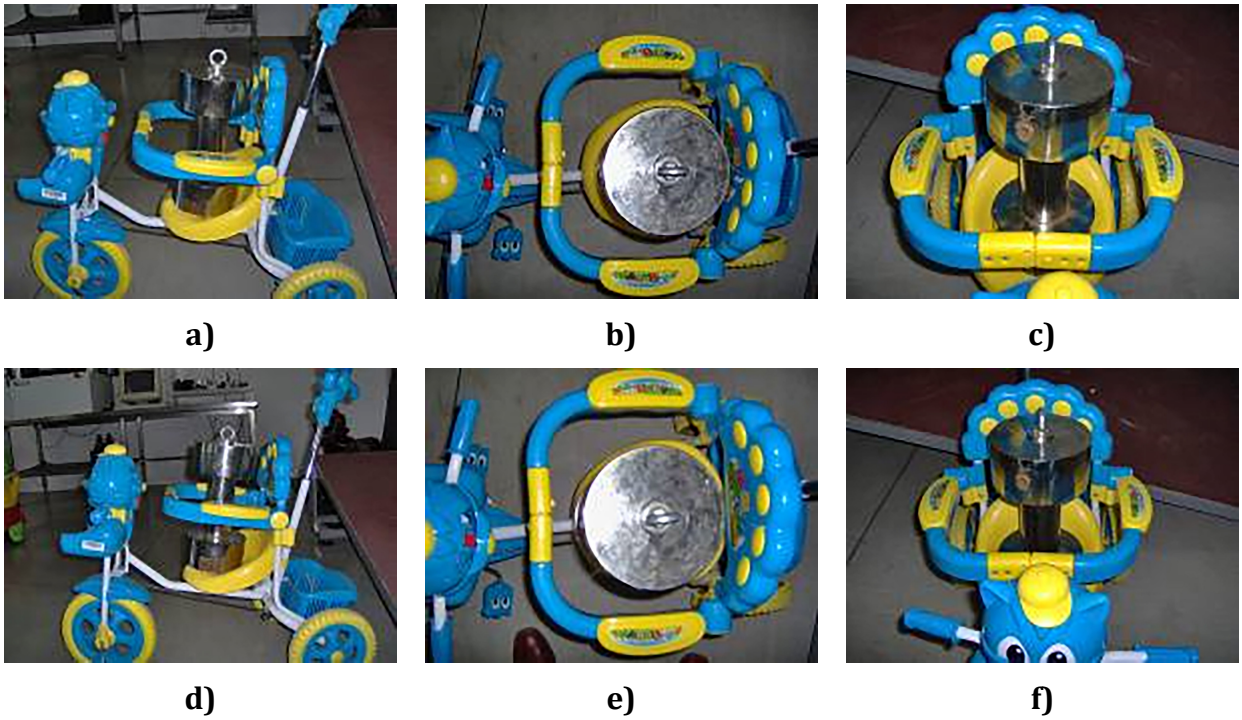
a) **b)** **c)**

Figure 31

According to our opinion, the correct interpretation is “load the toy in the most onerous position on the standing or sitting surface, in such a way the mass is perpendicular to the standing or sitting surface and that the vertical projection of the base of the test mass is fully enclosed in the sitting surface. If the standing or sitting surface is narrower than the test mass, the centre of the test mass shall be positioned along the axis of the seat”. Thus between the two positions shown in the following examples, in case we are considering the frontal stability, it is the second (the one with the test mass with its base in contact with the front edge of the seat) to be considered as the most onerous condition (in the other one, the test mass is just centred on the seat, and thus this is not the most onerous position). Nevertheless, allowing laboratories to place the mass with its base outside the sitting surface would lead to have no more repeatable tests.

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a) b) c)

d) e) f)

Figure 32

Question (BSI, United Kingdom)

The clause states "Load the toy in the most onerous position" Can this be clarified as to whether the weight/mass is loaded in the most onerous position or the toy is placed in the most onerous position with the test mass located in the "normal" position of use?

Comments/proposal for an answer: Believed that the test mass should be placed on the seat (or standing position) to the extremity of the seat, but within the confines of the seat, i.e. not overhanging the seat.

Also, the test mass should remain perpendicular to the plane of the seat, when placed on the 10° slope.

Reply to both the UNI and BSI questions

Before placing the toy on the slope, the mass shall be placed on the sitting or standing surface so that the main axis of the mass remains as close as vertical as possible without any additional support between the mass and the sitting or standing surface. If the sitting or standing surface is larger than the base of the test mass, the test shall be performed placing the mass on the sitting or standing surface in the most onerous position(s) with regards to stability and shall remain within the sitting or standing surface. It is allowed to use e.g. tape, straps, etc. to maintain the mass in position when the toy is placed on the slope.

REQ 070-06 (UNI, Italy); REQ 074-07 (BSI, United Kingdom)

4.16 4.15.1.4 Stability (no action decision)

Question

4.15.1.4 related to stability of toys propelled by a child or by other means indicates in its third indent that the stability requirement does not apply to:

"- toys intended for children of 36 months and over where the feet of the child can provide sideways stability (i.e. where the legs are unrestricted in their sideways motion) and where the height of the seat

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