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

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National foreword

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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 Technical Report was approved by CEN on 8 March 2019. It has been drawn up by the Technical Committee CEN/TC 252.

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Full document details: PD CEN/TR 16411:2019

Contents

Page

Contents

European foreword 4

Introduction 5

1 Scope 8

2 00252033 – EN 1273:2005, *Child use and care articles — Baby walking frames — Safety requirements and test methods* 9

3 00252059 – EN 1888:2012, Child care articles — Wheeled child conveyances — Safety requirements and test methods 11

4 00252051 – EN 1930:2011, Child use and care articles — Safety barriers — Safety requirements and test methods 27

5 00252046 – EN 12586:2007, *Child use and care articles – Soother holder – Safety requirements and test methods* 45

6 00252048 – EN 12790:2009, Child use and care articles — Reclined cradles 63

7 00252049 – EN 12221-1:2008 , Changing units for domestic use — Part 1: Safety requirements 68

8 00252050 – EN 12221-2:2008, *Changing units for domestic use — Part 2: Test methods* 71

9 00252054 – EN 1466:2004+A1:2007, *Child care articles — Carry cots and stands — Safety requirements and test methods* 72

10 00252032 – EN 14350-2:2004, *Child use and care articles — Drinking equipment — Part 2: Chemical requirements and tests* 75

11 00252089 – EN 1400:2013+A1:2014, Child use and care articles – Soothers for babies and young children – Safety requirements and test methods 77

12 00252024 - EN 14372:2004, *Child use and care articles — Cutlery and feeding utensils — Safety requirements and tests* 99

13 00252065 – EN 16120:2012, Child use and care articles - Chair mounted seat 102

14 00252023 – EN 14350-1:2004, Child use and care articles - Drinking equipment - Part 1: General and mechanical requirements and tests 104

15 00252058 – EN 16232:2013, Child use and care articles – Infant swings 108

Annex A (informative) Interpretation 3 on 3.9 and 5.1.4.2 in EN 12586:2007, *Child use and care articles — Soother holder — Safety requirements and test methods* (WI 00252046) 111

A.1 Introduction 111

A.2 Examples of possible ventilation holes in more recent models of soother holders 112

Documents
Document Sharing Hub

Full document details: PD CEN/TR 16411:2019

Annex B (informative) Reply to interpretation 3 on 3.9 and 5.1.4.2 in EN 12586:2007, *Child use and care articles — Soother holder — Safety requirements and test methods* (WI 00252046) **114**

Annex C (informative) Reply to interpretation 1 on 5.1.10 in EN 12586:2007 *Child use and care articles — Soother holder — Safety requirements and test methods* (WI 00252046) **116**

C.1 Ventilation holes in fastener (5.1.10) **116**

C.2 Discussion **116**

C.3 Final Interpretation **121**

Bibliography **122**

Documents
Document Sharing Hub

Full document details: PD CEN/TR 16411:2019

European foreword

This document (CEN/TR 16411:2019) has been prepared by Technical Committee CEN/TC 252 “Child care articles”, the secretariat of which is held by AFNOR.

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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.

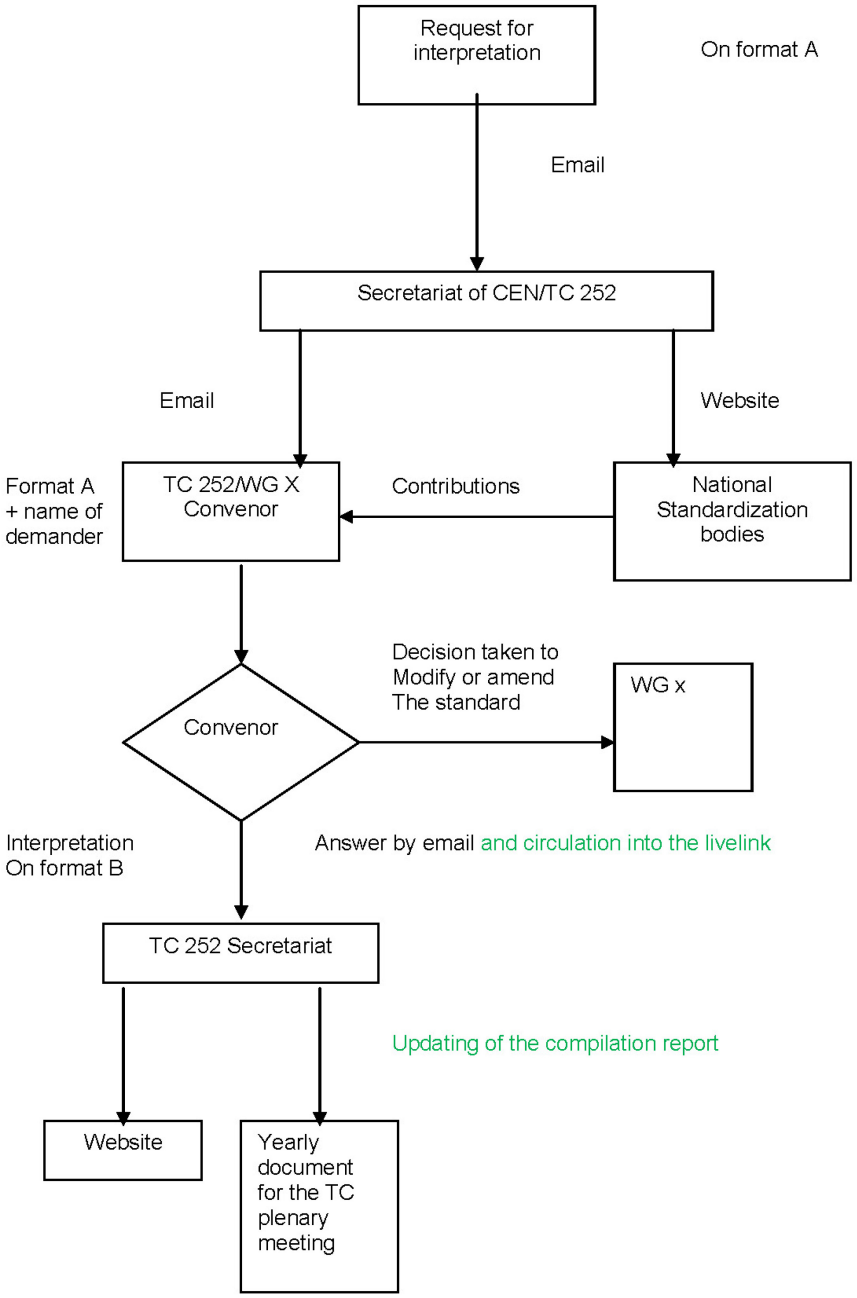
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c) Answers to requests for interpretations:

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.

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31/05/2012

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1 Scope

The purpose of this CEN Technical Report 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 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 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.*

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Full document details: PD CEN/TR 16411:2019

2 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		1/2014 (2)

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.	

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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.

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Full document details: PD CEN/TR 16411:2019

3 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°
1	Scope	6/2015
3.3 & 3.4	Definitions	12/2015
4.5.1	Protected volume	8/2015
4.5.3	Various requests	2
8.3.1		4/2015
8.3.3	Folding mechanism	13/2016
8.3.3.1.2.4	Locking mechanisms	9, 10 & 11/2015
8.4		17/2018
8.5	Choking and ingestion hazards	14/2017
8.5.2.3	Bite test	16/2017
8;8.1	Parking and braking	15/2017
8.9.1.2.1	Uses of “stop” for parking	3
10.2.6	Marking	7/2015
10.4	Instructions for use	5/2014

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

N°	Clause/ Subclause / Annex	Question	Reply
2	4.5.3	1. There is a difference between the structure of this clause and Clauses 4.5.1 (paragraph 1) and Clauses 4.5.2 (paragraph 1) that begin with the words, "The protected volume…". Is there a reason for the difference?	No there is no reason for the difference. It's just a different wording. The standard makes a clear distinction on the protected volume for pram bodies designed for children less than 6 months (less than 800 mm length) and pram bodies designed for older children (over 800 mm internal length)
2	4.5.3	2. Is the clause applicable for pram bodies having a maximum internal length of 800 mm combined with a vehicle child conveyance for children older than 6 months?	No we considered that a pram body with an internal length less than 800 mm is designed for children less than 6 month. Of course the vehicle may be used for older children, but not in pram use (suitability and requirements of the seat unit)
2	4.5.3	3. The Experts Committee recommends that the word "only" be deleted from the first sentence. Will there be any implications by this change? Are there wheeled child conveyances designed only for children up to 6 months?	Yes the word "only" can be deleted without modifying the purpose of this clause. The protected volume described here concerns pram bodies less than 800 mm long and group 0/0+ car seats mounted on a vehicle
2	6	This clause does not mention nonmetals such as phthalates. Is there a reason for that? Is this requirement mentioned in some other required source?	Yes phthalates as other hazardous substances are already covered by a regulation (REACH) therefore there is no need to have it into the standard.
2	8.4	Is there any significance to the location of the connection point of the cord/string/narrow fabric?	The purpose of the requirement is to avoid free length inside the protected volume that will cause a strangulation hazard. We don't consider the attachment point of such cords

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N°	Clause/ Subclause / Annex	Question	Reply
			~~straps or~~/ strings/ narrow fabrics, but the length which is likely to exceed the acceptable measure inside the ~~protected volume.~~ Seat unit or pram body.
2	8.4	Does the requirement apply to a connection located outside of the seat unit or pram body that can be pulled into the inside of the seat unit or pram body with the force of 25 N? Example 1: There are seat units having a strip, for adjustment of the backrest, located at the rear of the backrest. When pulled into the inside of the seat unit with a force of 25 N, the length of the strip (the part of it that is now located inside the seat unit) exceeds 220 mm. Is it considered to be a failure? (see Figure A bellow) Figure A Example 2: There are seat units having a strip, attended to be attached to the carrier's hand, connected to the vehicle's handle. If a part of that strip penetrates to the inside of the seat unit or pram body, does the requirement apply to that part of the strip?	Yes it does Example 1: yes it is considered as a failure.It is a loop exceeding 360 mm and there is no detail in the standard on the location of the loop. Example 2: In English the word “located” means “attached”. The intention of the working group was to take into account the part of any cord/string/narrow fabric that can be found inside the pram body or seat unit, without being necessarily attached inside the pram body or seat unit. An amendment is needed and will be drafted to clarify this requirement.

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N°	Clause/ Subclause / Annex	Question	Reply
		   Figure A Example 2: There are seat units having a strip, attended to be attached to the carrier's hand, connected to the vehicle's handle. If a part of that strip penetrates to the inside of the seat unit or pram body, does the requirement apply to	

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N°	Clause/ Subclause / Annex	Question	Reply
		that part of the strip?	
3	8.9.1.2.1	To our experience there are different interpretations between different laboratories on this point of the standard. And the confusion seems to be regarding the way the wheels should be turned after putting on the brakes, before placing the stroller against the stop. Leading to different results on same product from different laboratories.	The principle of the test method is to ensure the use of a stop has the lowest effect on the test (possibly no effect) Parking devices shall be engaged first, and then the vehicle is placed on the slope. The most onerous condition shall be met (in accordance with § 4) when allowing the vehicle to rest against the stop. The test method shall be amended.
4	8.3.1	When used in relation to a removable accessory (rain hood) that is adjusted by the user and has no moving parts while is normal use. To clearly define and clarify the meaning of the terms 1) “potentially hazardous” 2) “rigid part” Taken from the present std: 1) No test method is specified 2) The situation on a moving frame is likely to be unrepeatable 3) In particular relation to where hood links are fitted on the outside of an approved accessory ie rain hood, any threat is only possible while the user is making an open / closing adjustment. No movement is present when in use. 4) The fabric / textile shields entry into the potential location from the inside of the hood.	The draft amendment to the clause is aimed so avoid such questions. An addition to the draft has been decided as follows: For hoods and any similar items such as canopies, sunshades …etc, the requirement is applicable to the space between the frame components; and between any hood tensionner attached to them and the frame components, within a distance of 100 mm measured from the primary pivot point of the hood. The working group agrees this space is within the protected volume and shall be considered.

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N°	Clause/ Subclause / Annex	Question	Reply
		5) All plastic parts have corner edge radii As this clarification will impact approx. 50% of branded products offered in EU under cover of the EN1888:2012, other UK brands may wish to add further comment or opinion to the above before presentation at the CEN/TC252 meeting   	
5	10.4	EN 1888 '10.4 Instructions for use' reads: "...in the form of instruction sheet, instruction manual, leaflet or other similar physical support." Is a USB stick considered 'similar physical support'? Would providing such a stick mean you meet the requirement?	No this is not an acceptable support. Consumers are not supposed to all have a computer.

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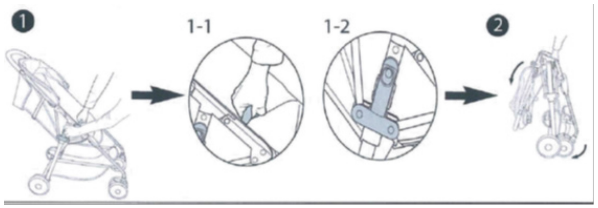
N°	Clause/ Subclause / Annex	Question	Reply
6	1	The mirror committee has been made aware of the product (a skateboard stroller) shown in the pictures below.   Does this kind of product/design fall under the scope of EN 1888?	One of the function of the product (transportation of a child) falls into the scope of EN1888: 2012, but further study and risk assessment shall be conducted to assess its safety in accordance with General Products Safety Directive 2001/95/EC. The product should not claim compliance with the EN1888 standard.
7	10.2.6	10.2.6 Seat units shall be marked with the following warning: "WARNING Always use the restraint system" For seat units complying with 8.1.1.1.1 b) the warning shall be visible only when the vehicle is used as a pushchair. As the warning needs to be translated in several languages many companies used to put the label into the shopping basket: it is visible when the product is in position for use; and there is enough room to have all languages This position has been accepted by laboratories, but others refuse this. Is this position acceptable?	The requirement is clearly applicable to seat units Clarification: YES Amendment of clause 10.2.6 is needed to replace the word "seat unit" by "pushchair" Modify 10.2.6 to read Pushchairs shall be marked with the following warning: "WARNING Always use the restraint system" This will be introduced in the draft amendment 1.
8	4.5.1	In the clause 4.5.1 Protected volume of seat units, if the product has lateral protections (e.g. handrails or side fabrics on the both sides of the seat), is the access zone (the out of the seat) measured from the upper surface of lateral protections like the picture below? Or, whether lateral protections exist or not, is measured according to Fig 1 of the clause 4.5.1.?	No, the protected volume shall be measured in accordance with the figure 1 in the standard. Lateral protections are not considered for defining the protected volume unless for the area located underneath the seat. The reclining backrest shall be adjusted to all

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N°	Clause/ Subclause / Annex	Question	Reply
		And, when determining the protected volume, is the adjustable backrest positioned to fully reclined? Or fully upright?  	possible positions.
9	8.3.3.1.2.4	According to the **ii) where both operating devices are intended to be operated by hand(s) (e.g. for their position, shape, according to the manufacturer's instructions for use, etc.) they shall both automatically return to their original status and the locking devices shall reengage when tested in accordance with 8.3.3.1.2.3. of the b) of clause 8.3.3.1.1.3 Unintentional release of locking mechanism(s),** I think two operating devices in the picture 2	Yes, both operating devices 1-1 and 1-2 shall reengage automatically.

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N°	Clause/ Subclause / Annex	Question	Reply
		(1-1. the operating device is located at the center of the seat and it is activated by the carer through pulling action, 1-2. side latch type operating device) shall be reengaged automatically, am I right?	
10	8.3.3.1.2.4	During testing in accordance with the clause **8.3.3.1.2.4 Effectiveness of locking mechanism(s) on vehicles where the chassis can fold with the pram body or seat unit or car seat installed**, applied force raises the frame of the handle, so a gap is occurred between the frame of the handle and the frame of the rear wheel (picture 1). When remove the force, a gap is disappeared. Is it applied to **c) the application of an external force by the carer of clause 8.3.1?** So, is it hazard from moving part? If you determine it is hazard, actually I guess this gap is too hard to be accessed child's finger when the child is seated, so could you tell me why? If you determine it is not hazard, could you tell me why?	Clauses of the standard shall be considered independently unless otherwise stated. The requirement of 8.3.3.1.2.4 is clearly explained in 8.3.3.1.1.3 as follows: *During testing in accordance with 8.3.3.1.2.4 the vehicle shall not fold. After testing in accordance with 8.3.3.1.2.4 the vehicle and the locking mechanisms shall not be damaged and the vehicle shall still comply with the requirements of 8.2* (entrapment) *and 8.7*(hazardous edges and protrusions). Therefore, the gap recorded on picture 1 cannot be considered as a hazard from moving parts (8.3.1) using the method of 8.3.3.1.2.4. We cannot on a picture assess if this would pass or fail 8.3.1 further physical assessment needs to be done.

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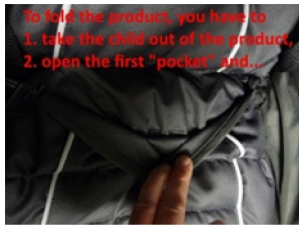
N°	Clause/ Subclause / Annex	Question	Reply
		 picture 1 (a gap is occurred in the red circle during testing in accordance with 8.3.3.1.2.4)	
11	8.3.3.1.2.4	The 9th paragraph of the clause **8.3.3.1.2.4 Effectiveness of locking mechanism(s) on vehicles where the chassis can fold with the pram body or seat unit or car seat installed. For vehicles with 2 or more separate and independent operating devices operate each operating devices such as to disengage each locking devices in turn and apply force F in the same manner as in (a) and (b) above.** I understood the above paragraph means testing twice.	Yes when possible each locking device has to be tested separately.

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N°	Clause/ Subclause / Annex	Question	Reply
		First, test with one operating device is operated. And then test with the other operating device is operated. Am I right ?	
12	3.3 & 3.4	3.4 defines a car seat as follows: group 0/0+ child restraint system complying with ECE44 An i-size car seat is therefore not a car seat according to EN1888. An i-size car seat does fit the definition of a seat unit in 3.3, as follows: structure which may or may not be adjustable to achieve a reclining or recumbent position designed to support one or more children The above definitions are unchanged in prEN1888: 2014 Is it the intention that i-size car seats are tested as seat units with a 15kg test mass when the manufacturer has designated a maximum weight of say, 12kg and ECE44 group 0+ car seats are tested with 13kg?	The definition of a car seat in the revision of EN1888 (to be published as EN1888-1) will be modified to take into account this new regulation. For the application of the current standard an i-size child restraint system intended for children up to 15 months (83 cm) is to be considered as a group 0+ car seat referring to ECE44; therefore, test mass F shall be used for testing.
13	8.3.3	There are many products on the market, which have a folding strap "under the buttocks of the child", which claim to be "not to be to be able to be operated without taking the child off the seat". → Generally "Safe". Nevertheless, these straps are more or less directly, "free accessible" "directly" under the child and could, in certain circumstances, be pulled by the child, which could cause an non-intentional folding of the pushchair. As discussed within the TC252/WG3, these products do not comply with the European standard, even if sold in the US Millions of times and without any reported incidents. Question to CEN TC252/WG3:	There is no interpretation and no clarification possible on this subject; the product clearly fails the requirement of the standard. The working group cannot say the product is safe unless a proper risk assessment is carried out. An amendment to the EN1888-1 has to be developed.

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N°	Clause/ Subclause / Annex	Question	Reply
		Are the below shown “improvements” of the above mentioned folding mechanisms SAFE, even if they do not comply with the wording the current EN1888:2012? 1.    Or 2.:   	

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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" 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." 	The current standard (as well as the draft EN1888-1) 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.
15	8.8.1	In case of a stroller having more than 2 rear wheels/sets of wheels, and	The standard is clear: the parking device has to

Documents
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Full document details: PD CEN/TR 16411:2019

N°	Clause/ Subclause / Annex	Question	Reply
		the parking device engages simultaneously (with a single action) only on the two outermost wheels\ sets of wheels, does this configuration comply with the requirement of clause 8.8.1 in the standard? A specific example which we came across with is as follows: The parking device of the stroller in the following picture engages simultaneously (with a single action) only on the two outermost sets of wheels, but not on the middle set of wheels. Does this parking device comply with the above requirement of the standard? 	engage simultaneously on ALL wheels/sets of wheels. This product shown on the picture does not meet the requirement of 8.8.1
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	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.

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N°	Clause/ Subclause / Annex	Question	Reply
		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.	
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. Draft EN1888-1 is modified to clearly exclude those handles

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N°	Clause/ Subclause / Annex	Question	Reply
		 	

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4 00252051 – EN 1930:2011, Child use and care articles — Safety barriers — Safety requirements and test methods

Table 5 — Summary table of the request for interpretations classified in the order of the clauses/subclauses of EN 1930:2011

Clause/Subclause	Title	Interpretation n°
6.2.2.3 & 6.2.2.6		2/2017
6.2.2.3 & 6.5.1.2		10/2017
6.3.1		4/2017
6.4.1.1		5/2017
6.4.1.3.		1/2012
6.4.1.3 & 6.4.2.2		9/2017
6.5.1.1		3/2017
6.6.1 & 6.6.2		11/2017
6.7		8/2017
6.12.1		6/2017
6.12.2		7/2017

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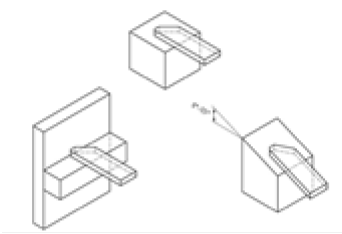
Table 6 — Table of the request for interpretation/clarification for EN 1930:2011

N°	Clause/ Subclause / Annex	Question	Reply
1	6.4.1.3.	The standard specifies in the test for barriers with a closing system with a mechanism that closes the system without the intervention of the user that the tester shall operate the opening and closing system 10 times from the maximum and minimum opening positions. The question was how the maximum and minimum opening positions are determined.	WG4 experts have discussed 6.4.1.3. and make the following clarification: The automatic mechanism shall always close and lock throughout the whole range of opening (from 0° and above) without the intervention of the user. Minimum and maximum openings may not be the most onerous condition therefore intermediate positions shall be checked.
2	6.2.2.3 & 6.2.2.6	A foothold exists on a continuous structure if four triangles marked on the template are completely obscured by the structure being checked. Using either the left or right hand template, place the template with its marked face on any continuous structure inclined at an angle of less than 55° to the horizontal. Orientate either template, Figure 2, to check whether any four triangles are obscured indication a foothold; see figure 16 for examples. Question: We have a lower catch on a gate with a curved top see below image:	It was the intention of the Committee that the four triangles on the template should be in direct contact with the structure being measured in order for it to be considered a foothold. During the revision of the standard, this will be addressed.

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N°	Clause/ Subclause / Annex	Question	Reply
			

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N°	Clause/ Subclause / Annex	Question	Reply
		Is this top surface considered a foothold? This is being interpreted differently across laboratories. The requirements of this clause are as shown in Figure 16 intended for flat surfaces.  When the template is placed on top of a curved surface such as this the triangles cannot be filled.	
3	6.5.1.1	Please could you clarify clause 6.5.1 Finger entrapment. A lab has applied toe test of clause 6.5.1.2 to a gap between a plastic handle located on the barrier and plastic on the frame of the gate shown in the figure below. The lab has failed the product to this clause.	By 'opening', the Committee intended to describe a completely bounded circular opening, in line with work being done in TC 252/WG6 and other Working Groups in other revisions.

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N°	Clause/ Subclause / Annex	Question	Reply
		 7 mm diameter probe inserted between handle and frame Please confirm if the gap depicted above is covered by the requirement of clause 6.5.1.	
4	6.3.1	1) Finger entrapment (DIN EN 1930:2012 clause 6.5.1.1) There shall be no openings between 7 mm and 12 mm unless the depth of penetration is less than 10 mm when tested in accordance with DIN EN 1930:2012 clause 6.5.1.2. Issue: A test lab performed the test as follows: At the bars lying one after the other there is an opening at which the penetration depth of 7 and 12 mm of finger is greater	1) The intention of the Committee was to refer to bounded openings that could stop the supply of blood to the finger in line with the rationale of TR 13387-3:2015. Figure 15 specifically excludes gaps and openings of the dimensions given in this example. 2) The test should be conducted in accordance with the test method in the standard. The force applied should be 30N applied only once. The Committee did not view this as an interpretation as the standard is clear, it just has not been followed.

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N°	Clause/ Subclause / Annex	Question	Reply
		10 mm. In the upper area of Strength to the penetration (12 mm of finger) 27. 6 N measured In the middle area of Strength to the penetration (12 mm of finger) 3. 4 N measured Durchdringung bei 3,4 N im mittleren Bereich 	

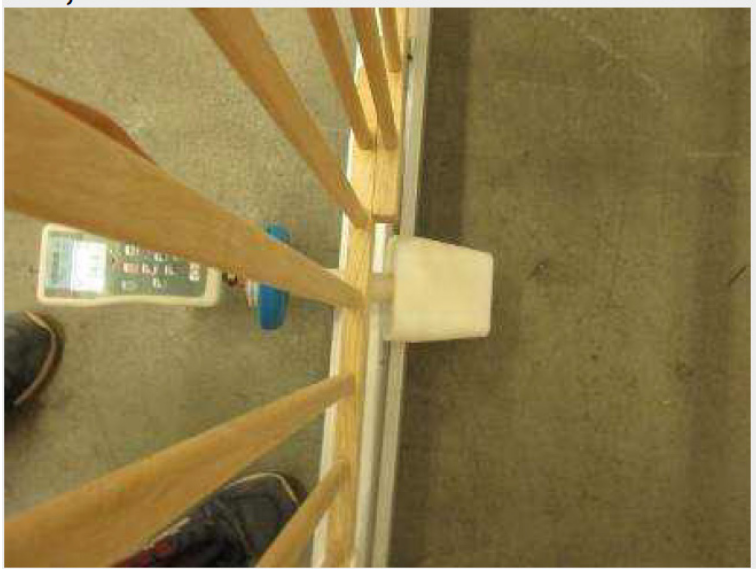
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N°	Clause/ Subclause / Annex	Question	Reply
		Durchdringung bei 27,6 N im oberen Bereich  Question: Should such gap have been tested as one of the dimensions is larger than 12 mm (CEN TR 13387-3:201). If such gap is to be tested, the force below 5N in the middle should allow the child to remove his finger, thus not being an issue. 2) When tested in accordance with DIN EN 1930:2012 clause 6.3.2 there shall be no gap within the safety barrier or between the safety barrier and the side of the test frame or between the safety barrier and the floor/base of the test frame that allows the hip probe to pass through from either side of the safety Barrier Requirement: 30 N	

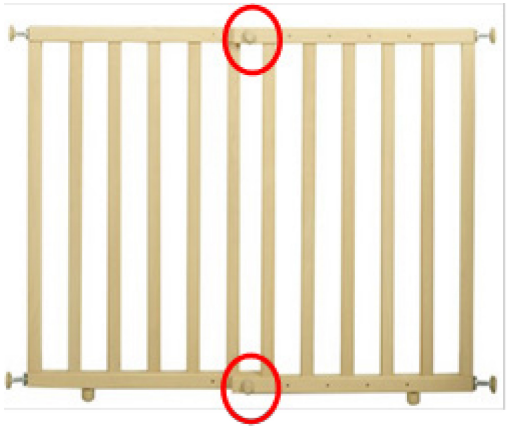
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N°	Clause/ Subclause / Annex	Question	Reply
		Issue: A test lab performed the test as follows: the hip probe can be pushed through at 58 N between the frame of the safety gate (bottom) and the test rack (aluminium). - After the test the whole safety gate lift about 6 mm 	

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N°	Clause/ Subclause / Annex	Question	Reply
		Zweitversuch zeigt Kraftniveau von 24,4 N  - If a second test is carried out, the hip probe can be pushed through the safety gate with a force of 24.4 N Question: Is this test correctly done?	
5	6.4.1.1	1) Please could you clarify clause 6.4.1.1. Unintentional opening. A non-opening safety barrier contains two plastic buttons that fix the two wooden elements of a gate. These buttons can be screwed/unscrewed manually. If unscrewed, the two wooden elements still hold together but can be removed with push/pull movements, as shown on the video.	1) Clause 6.4.1.1 refers to the opening and closing of the barrier and does not apply to non-opening barriers. This mechanism is for assembly of the barrier only. 2) It is the view of the Committee that this barrier technically meets the requirements of the standard due to there being two consecutive actions required to unlock it.

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N°	Clause/ Subclause / Annex	Question	Reply
		 Does clause 6.4.1.1. apply for this gate, meaning that it shall conform to one of the following conditions: - at least two consecutive actions are required to release the opening system, the operation of the second being dependent on the first having been carried out and maintained; or - at least two separate but simultaneous actions are required to release the opening system operating on different principles. If this is the case, do you consider unscrewing and shaking the	

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