PD CEN/TR 16411:2022



BSI Standards Publication

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

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National foreword

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The UK participation in its preparation was entrusted to Technical Committee CW/1, Safety of child use and child care products.

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

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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 21 February 2022. It has been drawn up by the Technical Committee CEN/TC 252.

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European foreword

This document (CEN/TR 16411:2022) has been prepared by Technical Committee CEN/TC 252 “Child care articles”, the secretariat of which is held by AFNOR.

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 16411:2019.

Any feedback and questions on this document should be directed to the users’ national standards body. A complete listing of these bodies can be found on the CEN website.

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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.

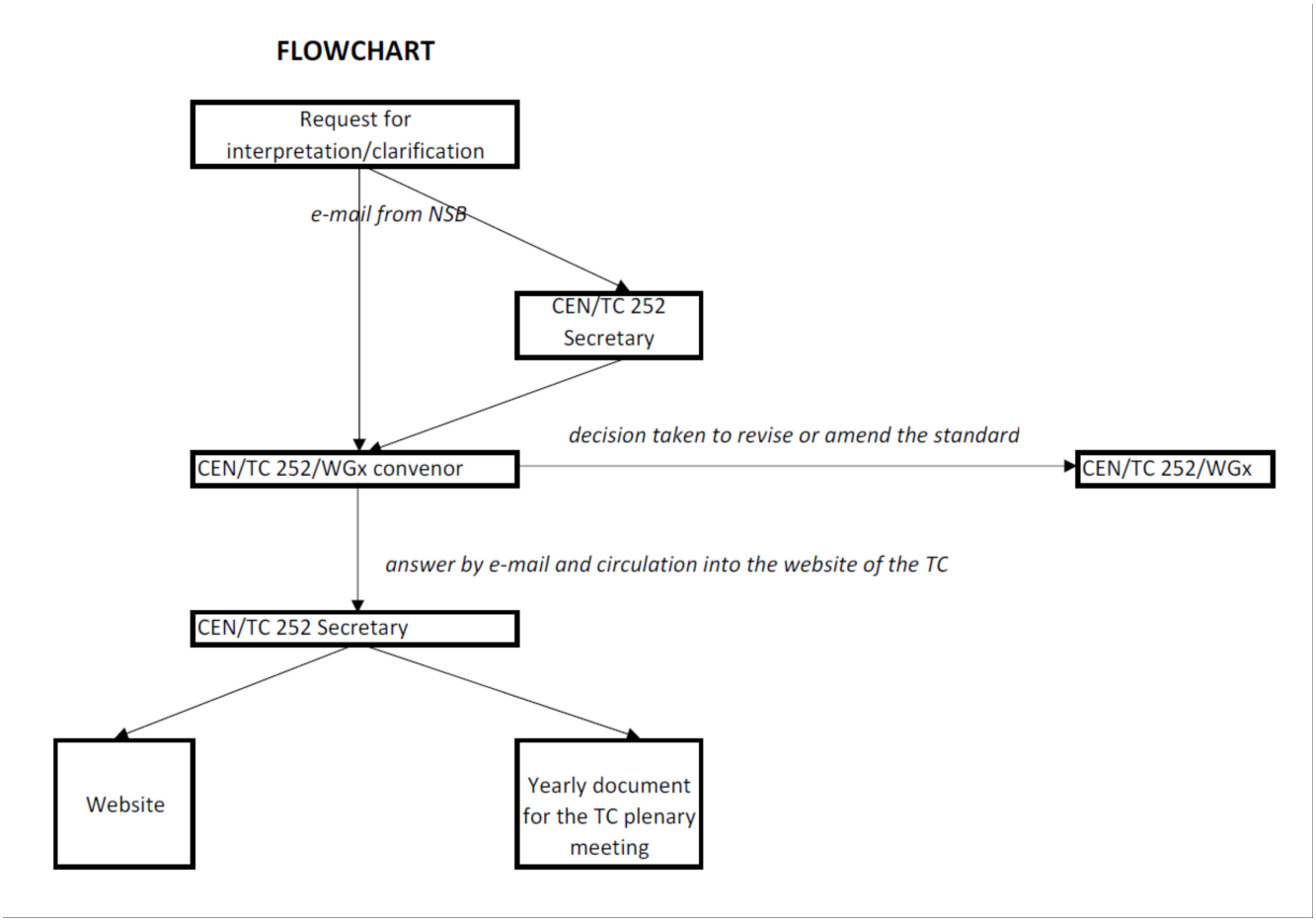


Figure 1

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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*;

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— 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.

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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.	

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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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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.

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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.

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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.

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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.

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N°	Clause/ Subclause/ Annex	Question	Reply
18	8.5.1	"When tested in accordance with 8.5.2.1 and 8.5.2.2 any component or part of a component within the protected volume that is removed, whether intended to be removed without the use of a tool or not, shall not fit entirely within the small parts cylinder (5.6) in any orientation without compression." "When tested in accordance with 8.5.2.3 no filling, rubber, plastic, foam, etc. shall be detached from the bumper bar. If components indicate signs of detachment carry out tests in accordance with 8.5.2.1 and 8.5.2.2 at the position where the components show signs of detachment." Regarding 8.5.2.3 (Bite Test) 1. How can "a cover that can be removed by the child during use" be assessed? 2. How shall foam of the bumper bar be assessed, when it is covered by a non-removable cover, but which is not fully closed at both ends? In the example below, where the bumper bar had 2 covers (one outer with zipper and an inner which enclosed the foam from one end to the other), the lab has 1. Opened the zipper of the outer cover 2. Pushed the inner cover back to reach the foam 3. => Failed Does this procedure correspond to the standard?	To assess if a cover can be removed by the child during use; relevant conditions can be found into the mattress standard, EN16890: 2017, clause 8.3.2.2.3 The bite test shall then be conducted in accordance with the procedure described, on the inner cover. The accessibility of the filling material through openings on both sides of the bumper bar (these openings can be more or less reduced by elastic straps or the like) is another concern that needs to be addressed by amendment to the current wording of the standard.

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N°	Clause/ Subclause/ Annex	Question	Reply
		 If the cover is not removable (no zipper) but not completely closed at both ends, shall the cover be partially removed to show direct access to the foam inside? (“Not completely closed” means in this case, that it is somehow possible to push/pull it back)	
19	4.2 8.10.3 8.10.6	*4.2 Principle of the most onerous condition* *Unless otherwise stated each test shall be conducted with the vehicle in the most onerous condition for that test in terms of:* - *[…]* - *the adjustment of seat units, pram bodies, handles, car seats, and any other adjustable features or accessories, or any other optional arrangement of the vehicle allowed in the manufacturer's instructions or otherwise approved by the manufacturer.* *8.10.3.2 Irregular surface test – Test method* *The vehicle shall be placed on the irregular surface test equipment (5.10) in a position so that the vehicle handle(s) can be attached to the independent articulating arms (5.10.2). The handle(s) shall be attached to the articulating arms initially positioned horizontally so that the free*	The working group agrees that the most onerous condition can only be determined by testing all different configuration, but we need to ensure the test is reproducible. It is reminded that in case of control of the market only one sample is tested. To ensure reproducibility the proposal is accepted: - telescopic handle shall be positioned in its highest position - adjustable (e.g. pivoting) part of the handle shall be aligned with the handle frame - in the pushchair configuration, the seat

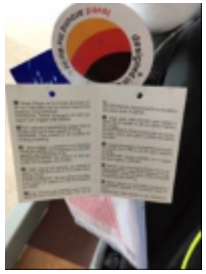
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N°	Clause/ Subclause/ Annex	Question	Reply
		movement of the handle(s) is not restricted *or controlled by the articulating arms. Where there are more than two handles the articulating arms shall be attached to the outer pair of handles.* *[…]* *For vehicles having alternative arrangements, the test shall be carried out for a total of 72 000 times, with a minimum of 48 000 cycles in the seat unit arrangement, and for the remaining 24 000 cycles, with an equal number of cycles for each arrangement.* *8.10.6.2.2 Handle strength – Durability test* *Position the vehicle on a horizontal surface without the parking device applied.* *[…]* *For vehicles having alternative arrangements the test shall be carried out a total of 10 000 cycles, with an equal number of cycles for each arrangement.* A vehicle may have different arrangements: • seat unit; • car seat or • pram body. Seat units, car seats and pram bodies can be placed in different directions:	unit is placed in the forward-facing direction (corresponding to the most current use) – where it is possible. In the case of a simple pushchair with reversible handle the number of cycles shall be divided to test the product in each direction of use.

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N°	Clause/ Subclause/ Annex	Question	Reply
		• facing road, or • facing mother The handle can also be adjusted in various positions: • reversible handle • telescopic handle • handle height adjustable What is the best way to test a vehicle offering such a range of different positions? How should the number of cycles be divided?	
20	10.3	**10.3 Purchase information (A.12)** *The manufacturer, importer or organization responsible for the sale of the vehicle shall provide the* *following information to be clearly visible at the point of sale.* *NOTE If the product is sold through internet, the point of sale is the web page where the product is sold.* **10.3.1** Information concerning the weight of the child for which the vehicle is suitable. **10.3.2** The warning "WARNING This product is not suitable for running or skating." Questions : 1. Is a hanger with the relevant EN 1888 information and warning (see	1. Yes a hanger visible at the point of sale is sufficient as purchase information 2. If the manufacturers web page is a point of sale this does not fulfil the requirement. Purchase information shall be available on the web page. 3. The manufacturer shall provide all required purchase information to the vendor or importer 4. No. The laboratory can only check the information which is delivered with the

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N°	Clause/ Subclause/ Annex	Question	Reply
		below) sufficient as purchase information ? A hanger is visible at the point of sale. Consumers can check the informations during their examination of the product in a shop.  2.Is it a fail which shall be mentioned in a test report when the purchase information is provided with such hanger only and not additionally on the importers web page which is maybe not a "sales web page " ? 3. How can an importer ensure that a vendors will provide the available information on their web pages ? 4. Is it the intention of the standard that an expert in a laboratory has to check the web pages of vendors to proof the compliance with the requirements in § 10.3 5. EN 1888 shall be a safety standard. Is the note : *"If the product is sold through internet, the point of sale is the web page where the product is sold "* a safety requirement or not? If not it should be cancelled	sample submitted for testing (this information can be given by a link to a web page). If this information is not submitted to the laboratory this is not a failure but it shall be recorded that this clause could not be verified. 5. No; the note is just a clarification of what is a point of sale. The requirement applies to web page as well.

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6 00252098 – EN 1888-1:2018, *Child care articles – Wheeled child conveyances – Part 1: Pushchairs and prams*

& 00252097 – EN1888-2: 2018, *Child care articles – Wheeled child conveyances – Part 2: Pushchairs for children above 15 kg up to 22 kg*

Table 5 — Summary table of the request for interpretations classified in the order of the clauses/subclauses of EN 1888-1 & 2:2018

Clause/Subclause	Title	Interpretation n°
	EN1888-1 – *Pushchairs and prams*	
1	Scope	6/2019
8.1.3.2.3	Strength of fastener	9/2020 Completed 2021
8.3.5.4	Locking mechanisms – Requirements for the attachment of pram body and seat unit and car seat to the chassis	3/2019 7/2020
8.4.1	Entanglement hazards – Requirements	2/2018 5/2019
8.9.1.2.1	Stability – Positioning of the vehicle	10/2021
8.9.3	Stability hazards due to the position of swivelling wheels	1/2017
10	Product information	4/2019
	EN1888-2 - *Pushchairs for children above 15 kg up to 22 kg*	
6.1.3 & 6.1.4	Attachment of restraint system Strength of fasteners	8/2020

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Table 6 — Table of the request for interpretation/clarification for EN 1888-1 & 2:2018

N°	Clause/ Subclause/ Annex	Question	Reply
1	EN1888-1 8.9.3	The requirement added in EN1888-1 says: *Stability hazards due to the position of swivelling wheels* *To avoid any hazards due to the swivelling wheels being in contact with each other impairing the proper run of the wheeled child conveyance, any swivelling wheel shall be able to rotate without blocking each other when orientated in the most onerous position.* *This requirement shall be checked with and without placing the test mass A, B or F respectively into the pram body, seat unit or car seat, and before and after testing in accordance with 8.10.* There is no way to assess if the wheels block each other, and this may cause discrepancies between labs. A test method should be proposed.	The test method proposed cannot be validated. The working group decides the change introduced in the irregular surface test method (EN1888: 2012 cl.8.10.3.2) that swiveling front wheels shall be unlocked during test will allow to assess whether the wheels are likely to block each other during use on uneven surfaces or when the vehicle is driven down curbs/steps etc … The blockage of the wheels will cause failure to the test and this is considered sufficient to assess the risk. This will be clarified in the rationale by amendment to the standard.
2	EN1888-1 8.4.1	Checking the prEN1888-1:2018 it seems that there is not any direct exclusion of the loop created by the restrain system in the entanglement evaluation. The exclusion refers only to the free length of restrain system (so for cord, strings and other narrow fabrics) In the EN 1888:2012 the loop exclusion instead is clearly present	The aim of the requirement was not to check loops formed by the straps of the restraint system as they are adjusted to the child when in use and therefore do not create entanglement hazards (as already considered in the previous EN1888: 2012) This is not an interpretation but the wording of the standard shall be amended to reflect that. This is mentioned in the draft A1 prepared by the working group.

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N°	Clause/ Subclause/ Annex	Question	Reply
3	EN1888-1 8.3.5.4	*[This shall be assessed with and without the test mass in the product. The pram body, the seat unit or the car seat shall not fall under their own weight when all the attachment devices are disengaged.]* As far as it is written (and it was the same in EN 1888:2012), this paragraph requires that, even when there are 2 locking mechanisms, eg on each side of the seat unit / pram body fulfilling point b or c, the seat unit / pram body shall not fall freely under its own weight when both mechanism are releases. To assess this, the mechanism must be blocked artificially. Apparently, laboratories are interpreting this requirement in different ways, as the same system is getting today opposite evaluations of pass and fail. Moreover, the rationale for this additional requirement is not clear as a system fulfilling this requirement would not make it clear to a consumer that both locking mechanism are broken, if ever this might happen.	The rationale behind this was to avoid products where the seat unit/car seat or pram body was literally suspended. The idea was to avoid, if the parent had both hands occupied to release the mechanism, falling of the seat unit / car seat or pram body; but not look for the most onerous condition (adjustment of a backrest, position of the test mass) that would lead to detachment or tipping over. The working group noted that this sentence was proposed during 2nd enquiry and rejected (doc N503) but for unknown reasons it was added into the draft sent out for formal vote (doc N501). This issue will be solved in the amendment currently drafted with the limiting the application of the sentence to pram bodies or car seat with a carrying function and therefore intended to be detached with the child inside.
4	EN1888-1 10	Since the publication of the EN 1888-1 standard we all noticed differences between the initials warnings in GB / French translation in the annex of the GB standard / Wrong translations in the French standard and also differences between annexes. (see table below). To summarize if a manufacturer follow the annex of the GB standard or even made a perfect translation in French of the warnings, those translations won't be in line with the current French version.	The proposal from the French Delegation is correct. Until the amendment is published, following sentences can be used as they convey the same meaning: IMPORTANT – A LIRE ATTENTIVEMENT ET A CONSERVER POUR REFERENCE ULTERIEURE

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N°	Clause/ Subclause/ Annex	Question	Reply
		In parallel, if a manufacturer follow the French standard, in order to complies with the NF EN 1888-1, these warnings should be changed in the next future because they will be aligned with the GB version. We all know that the administration for the control of the market does not accept deviation as soon as we are talking about warnings. The rule is simple: a warning shall be given exactly under the form given in the standard. Even if sometimes the differences are minors. ("a child", "your child" instead of "the child" for, example). We decided to introduce in the future draft of the EN 1888 these corrections. However, in the meantime, we must find a way and bring more flexibility during assessment, control and conformity of the products.	or IMPORTANT : A LIRE ATTENTIVEMENT ET A CONSERVER POUR CONSULTATION ULTERIEURE Ne jamais laisser l'enfant sans surveillance or Ne jamais laisser un enfant sans surveillance S'assurer que tous les dispositifs de verrouillage sont enclenchés avant utilisation Pour éviter toute blessure, maintenir l'enfant à l'écart lors du dépliage et du pliage du produit or Pour éviter toute blessure, maintenir votre enfant à l'écart lors du dépliage et du pliage du produit
5	EN1888-1 8.4.1	**8.4 Entanglement hazards (see A.5)** **8.4.1 Requirements** Free length of the *restraint system*, bags and carrying handles of *pram bodies* are excluded from this requirement Cords, strings and other narrow fabrics that originate within or extend into the *pram body*, *seat unit* or *car seat* shall not create a loop that has a peripheral dimension exceeding 360 mm nor have a free stretched length that exceeds a length of 220 mm, when measured in accordance with 8.4.2. Cords strings and other narrow fabrics that do not originate within the occupant space (4.7) but that can extend into the *pram body*, *seat unit* or *car seat* shall not create a loop that has a peripheral dimension exceeding 360 mm nor have a free stretched length that exceeds a length of 220 mm within *the pram body*, *seat unit* or *car seat*, when measured in accordance with 8.4.2 only on the portion of the component that can extend into *pram body*, *seat unit* or *car seat*.	The standard has to be applied as it is written, it is not possible to adapt a definition from another standard. In accordance with the current wording this kind of strap fails the requirement. The Experts however, agree there is no real hazard. A similar free length arising from the

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N°	Clause/ Subclause/ Annex	Question	Reply
		• New standard added the requirement for "cords, ribbons and other narrow fabrics" to be assessed, if they can extend into seat unit. • BUT the standard doesn't specify what "narrow fabric" is, i.e. dimension. • This opens the door for various interpretations. In the case below – SEE PHOTOS. • The straps have 25mm width, same as harness straps that are excluded from the same requirement. • The straps can only get into protective volume only on purpose by the parent – misuse, when canopy is removed and purposely routed above the seat backrest – this is not any potential use situation. • This construction has been sold over 2.000.000 pcs worldwide. No single incident. There is difference in interpretation of the standard between accredited labs: LAB A: considers backrest adjustment straps not as narrow fabrics, by definition used in the other child care standard EN 13209 Baby Carrier where narrow is defined <19mm, LAB B: applies the EN1888 without explanation what "narrow" is, considers no other standards.	restraint system would pass the requirement and this is not consistent. The issue can only be solved by amending the standard.

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N°	Clause/ Subclause/ Annex	Question	Reply
		  	
6	EN1888-1 1	There are tricycles on the market that, in addition to the toy function where the child can either propel the tricycle using the pedals or steer the tricycle when he is still not able to pedal, offer transportation features with high backrest, restraint system, bumper bar and including in some models a mom-facing position (see example below)	If the manufacturer claims the product is a pushchair the EN1888-1 applies. If the product is marketed as a tricycle with an additional function to transport young children for a short period (i.e 6 months) then it is excluded from the scope of the standard.

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N°	Clause/ Subclause/ Annex	Question	Reply
			In such a case, a risk assessment and type examination should be conducted to assess the safety of the product, and the relevant clauses of EN1888-1 can be used. Some criteria to decide whether a tricycle provides a transport function for young children are: - Marketing, age grade - Seat unit with a high backrest, reclinable or not - Restrain system - Ability to disengage child steering - .... The WG3 agrees safety requirements and test methods shall be drafted to cover these specific products. An adhoc group is created to discuss and propose a draft.

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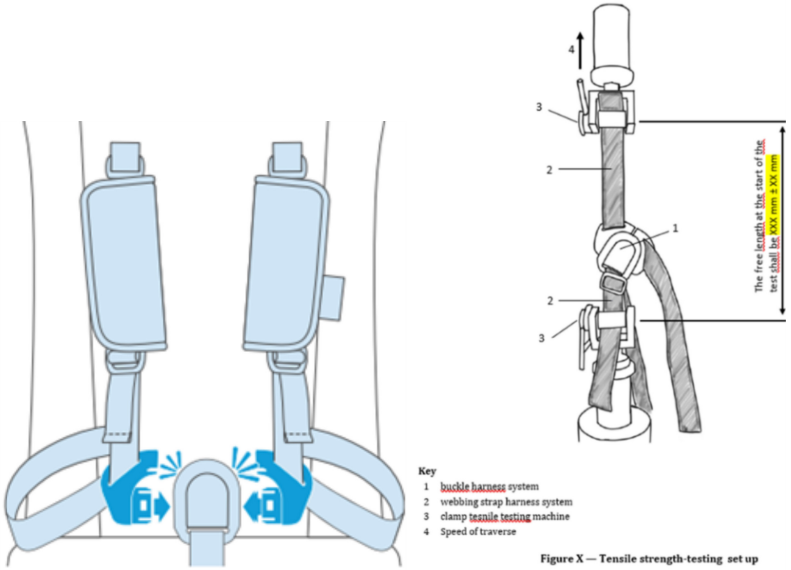
N°	Clause/ Subclause/ Annex	Question	Reply
			
7	EN1888-1 8.3.5.4	The Italian mirror committee requires a clarification about point d) of the clause 8.3.5.4 of EN 1888-1:2018. The point d) of the clause 8.3.5.4 requires more than two independent actions but it not specified that the action shall be on an operating device that acts on a locking device. On the market there are products where it is necessary act on a button on one side of the pram body or seat unit or car seat then act on another button on the other side of the pram body or seat unit or car seat and finally lift the pram body or seat unit or car seat. Both buttons require a force less than 50N to be activated and they do not reengage automatically.	In the condition d) the word “release” has been replaced by “detach”, to clearly explain this concerns the detachment of the seat unit/car seat or pram body. And the last sentence of the requirement clause applies to this condition. “Detach” means “separate”. Therefore, the case described by the Italian mirror committee would meet the condition d)

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N°	Clause/ Subclause/ Annex	Question	Reply
8	EN1888-2 6.1.3 6.1.4	In both clauses to test the strength of the attachment of the restraint system, and of the fasteners, the standard says **6.1.3 Attachment of restraint system** *Conduct the test in accordance with EN1888-1:2018, 8.1.3.2.2, applying a 220 N force.* **6.1.4 Strength of fasteners** *Conduct the test in accordance with EN1888-1:2018, 8.1.3.2.3, applying a 250 N force.* And clause 4.1 reads *To meet the requirements of this standard the vehicle shall be tested additionally, in accordance with the clauses listed below and in the order given in EN 1888-1 (see 4.2).* Therefore it is not clear, if the components have to be tested - First in accordance with EN1888-1 (with a lower force) - Then in accordance with EN1888-2 Or just once, applying the force given in EN1888-2	The intention of the wording of EN1888-2 is to replace the forces used in 8.1.3.2.2 and 8.1.3.2.3 by higher forces representing a heavier child. Therefore, the components must be tested just once, applying the forces given in EN1888-2
9	EN1888-1 8.1.3.2.3	*A tensile force of 200 N shall be gradually applied to the straps either side of the fastener. Maintain this force for 1 min.* The standard does not clearly describe how the test should be performed. We found different test methods and procedures with different results in the market.	This test shall be carried out on the sample, before other integrity tests, therefore, it is not intended in the current wording of the standard, to remove the restraint system to test it separately. The test method clearly says the tension force must be applied on either side of the fastener. The wording in the requirement “in any orientation” means waist strap and shoulder strap shall be tested separately in each of their direction of use.

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N°	Clause/ Subclause/ Annex	Question	Reply
		 Figure X — Tensile strength-testing set up	The principle of the direction of the force in the picture/figure (shoulder strap, crotch strap) proposed is correct. (but the straps should have been tested on the vehicle). Where the shoulder strap and waist strap are formed from one continuous strap (as shown in picture/figure) and the shoulder and waist strap cannot be independently adjusted, the respective shoulder and waist straps should be clamped together, and the force applied across one shoulder/waist strap and the crotch strap The working group agrees improvement is needed in the standard for consistency and proposes to amend the clause – future work
10	EN1888-1 8.9.1.2.1	The standard currently states: *'Position the vehicle on the test surface inclined at an angle of 12° without engaging the parking device',* however, some test houses are placing the vehicle on the test surface in a horizontal position and then inclining it with a hand-operated or motor-powered crank. This creates an element of momentum that leads to differing results dependent on the speed at which the surface is inclined.	The test method in the standard is clear. The test surface is inclined at 12°, then the vehicle is positioned on it. Obviously, the test houses cited in the request do not test as intended.

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7 00252051 – EN 1930:2011, *Child use and care articles — Safety barriers — Safety requirements and test methods*

Table 7 — 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
6.8.2.2	Tensile test	12/2021
6.12.1		6/2017
6.12.2		7/2017

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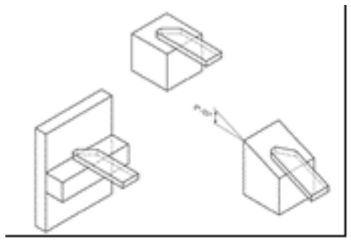
Table 8 — Table of the request for interpretation/clarification for EN 1930:2011

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
		 Is this top surface considered a foothold?	

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N°	Clause/ Subclause/ Annex	Question	Reply
		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	6.5.1.1	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 10 mm.	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
		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	

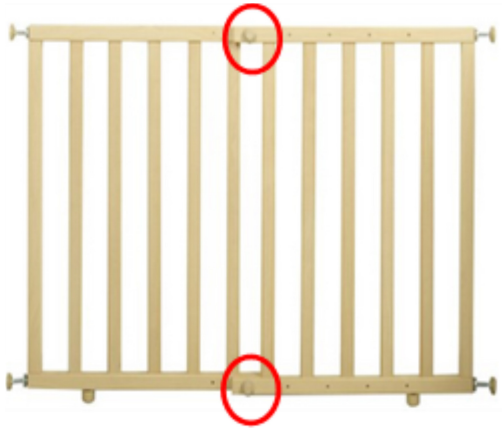
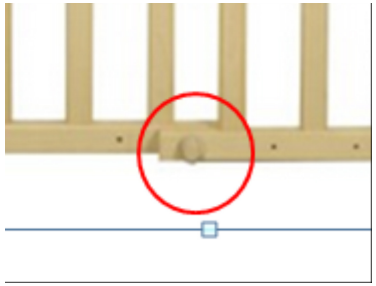
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N°	Clause/ Subclause/ Annex	Question	Reply
		Requirement: 30 N Issue: A test lab performed the test as follows: the hip probe can be pushed through at 58 N between the frame of the safety gate (bottom) and the test rack (aluminium). - After the test 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?	

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N°	Clause/ Subclause/ Annex	Question	Reply
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.   Does clause 6.4.1.1. apply for this gate, meaning that it shall conform to one of the following conditions:	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
		- 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 elements as shown in the video to be two consecutive movements. 2) Unintentional opening (EN 1930:2011 clause 6.4.1.1) Safety barriers shall conform to one of the following conditions: a) 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 b) at least two separate but simultaneous actions are required to release the opening system operating on different principles. Components for fitting the safety barrier into an opening that are not intended to be removed or released for allowing access are excluded from this requirement. Issue: A test lab performed the test as follows: The Safety barrier can be opened according to method a). 1. Press the release lever with the foot 2. Press the grid down from the top Then the door is unlocked and shall be lift to open.	

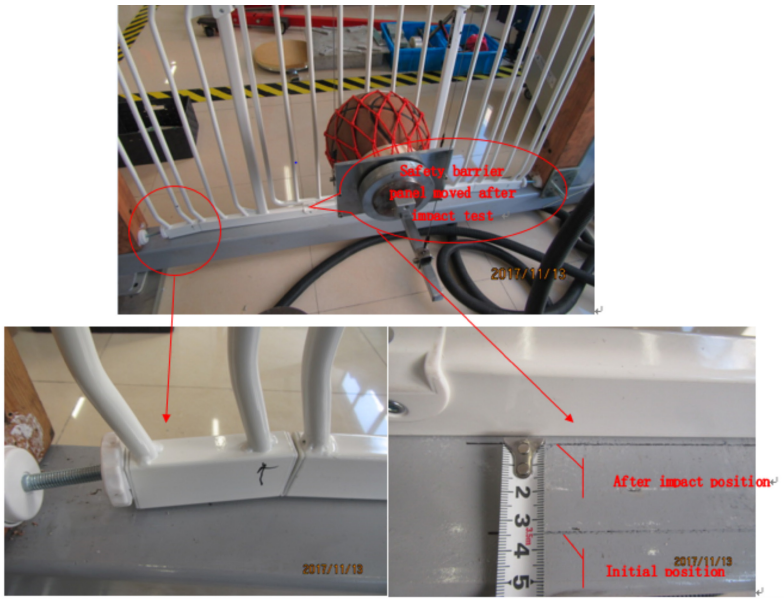
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N°	Clause/ Subclause/ Annex	Question	Reply
		When the release lever is actuated, only a very small force is needed to press down the safety barrier (24 N). If A child steps on the release lever and holds on to the top safety barrier, it is not unlikely that the barrier unlocks.  Question: The test lab described two consecutive movements. The norm does not state a minimum force required for any of these movements. Can a lab fail a gate because it estimates that the force needed is not sufficient? Moreover, as can been see in the video enclosed in the email sent to Julie, the opening of the gate needs in total 3 movements, not just 2.	

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N°	Clause/ Subclause/ Annex	Question	Reply
6	6.12.1	Regarding clause 6.12.1 and the requirement below: "When tested in accordance with 6.12.2 the maximum permissible movement of the safety barrier shall be 25 mm from its initial position". - During the impact test, the barrier panel moved more than 25mm, but it still functions as intended, should this be a FAIL? - For the maximum permissible movement measurement, which position should be concerned? a) The whole panel? b) The Four assembling cup positions? c) Both? See images below…	The wording of the standard is clear. If the barrier moves more than 25mm from its initial position, then it has FAILED this test, irrespective if it still functions as originally intended.

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N°	Clause/ Subclause/ Annex	Question	Reply
7	6.12.2	There is a requirement mentioned in 6.12.2 that states "Impactor do not contact with the impact surface" & "distance between the intended impact surface and the impactor cannot >10mm". However, using a basketball as the impactor, at point C for 3 times. The gate (especially when fitted with an extension) will be moved a few millimetres after the 1st impact at point C. It means that distance between impact surface and impactor is >10mm. How do we conduct the 2nd impact at point C? 1. Should we adjust the impactor to control the distance within 10mm? 2. Should we adjust the gate to original setup position on test frame to control the distance within 10mm? 3. Should we keep the impactor at the original setup position that we perform 1st impact test at point C, and keep the gate as is after 1st impact?	The Committee considered the 'real life' scenario and agreed that the barrier would not be adjusted between impacts at the same point. Therefore the barrier should not be adjusted and the remaining impacts performed with the impactor at the original position. For the impacts at point'd', the impactor would be adjusted to meet the 10mm distance requirement between the intended impact surface and the striking point of the impactor.

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N°	Clause/ Subclause/ Annex	Question	Reply
8	6.7	Please could you clarify clause 6.7. Protrusion hazards. The test method specifies that the spherical mass should be moved evenly along the top rail of the safety barrier so that the ball chain loop is draped and then dragged over and across any protruding part. If the loop is retained by a protruding part the spherical mass should be lowered until it is supported by the protruding part. The test shall be conducted starting at each end and on each side of the safety barrier. Most test labs move the spherical mass along the top rail from one side to the other and back as shown on the video but one lab tests only in one direction, not allowing to change the direction of the movement. Please confirm if the spherical mass should be moved back and forth or only from left to right or right to left, starting at each end and on each side of the safety barrier.	The test has been conducted correctly as illustrated in the video provided and in the opinion of the Committee. The tests shall be conducting starting at each end and on each side of the barrier.

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N°	Clause/ Subclause/ Annex	Question	Reply
9	6.4.1.3 & 6.4.2.2	Clause 6.4.1.3 reads Closing systems with a mechanism that closes the opening system without the intervention of the user shall also lock the opening system without the intervention of the user. After testing in accordance with 6.4.2.2 a closing system with a mechanism that closes the opening system without the intervention of the user shall continue to close and lock the opening system without the intervention of the user. Test 6.4.2.2 reads Operate the opening and closing system 10 times from the maximum opening position and 10 times from the minimum position. The requirement is not clear. The method given in 6.4.2.2 explains that the system shall be operated 10 times from the maximum and the minimum opening position but it is not defined, what the minimum opening position is. It is easy to find a default position of "self locking" barriers by placing them in the very minimum opening position, barrier will never reengage (see pictures 1 & 2. Below) Additionally, the requirement itself is not clear, as the wording does not precise in which condition the locking mechanism is verified. Using the wording of the test method would lead again, to a fail result for all products. 1) Was it the intention of the group to fail all products from the market?	WG 4 experts have discussed clause 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. See previous interpretation document N596. 1) No, it was not the intention of the group to fail all products from the market. 2) n/a. 3) Please see explanation above. If the product is marketed as an automatic close barrier then the requirements apply.

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N°	Clause/ Subclause/ Annex	Question	Reply
		2) If yes why not directly have a requirement saying that safety barriers shall not be able to lock without intervention of the user? 3) If not how shall the requirement be applied? 4) If the instructions for use clearly indicate how a gate (from which dimension of the opening) reengages is it acceptable to follow them for testing? Picture 1 & 2. Condition to fail "automatic locking" barriers  	

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N°	Clause/ Subclause/ Annex	Question	Reply
10	6.2.2.3 & 6.5.1.2	The standard states: 'A foothold exists on a continuous structure if four triangles marked on the template are completely obscured by the structure being checked. These four triangles shall have at least one side in common with another of the triangles' Test houses are interpreting the standard differently and some are projecting the shadow of the template onto the perceived foothold rather than placing the template in contact with it. If the shadow of four connected triangles is projected onto the perceived foothold, the product is deemed to have failed the test. The standard states that a 7 mm probe, as specified in 4.4 should be used to conduct this test with an applied force of up to 30 N. If this enters 10 mm or more into any accessible opening in any possible orientation then the 12 mm probe, specified in 4.4, shall also enter 10 mm or more with an applied force of up to 5 N. A test house has used a tapered probe and not as directed by the standard and has tested the gates adjusting system at distances from the minimum widths. As the handwheel adjuster is rotated away from the spindle the distance becomes 7mm and between 7-12mm and is a failure.	CEN Committee intended 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 revision of the standard this will be addressed. CEN Committee states that this clause should not be applied to the adjusting system. During revision of the standard this will be addressed. The probe should be exactly as specified in clause 4.4 and should not be applied to the adjusting system. During revision of the standard this will be addressed.

Documents
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