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Child use and care articles — 2014 compiled interpretations of CEN/TC 252 standards

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National foreword

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

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CEN/TC 252 standards

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des normes du CEN/TC 252 en 2014

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Foreword

This document (CEN/TR 16411:2014) has been prepared by Technical Committee CEN/TC 252 "Child use and 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 [and/or CENELEC] shall not be held responsible for identifying any or all such patent rights.

This document supersedes CEN/TR 16411:2014.

The list below shows the requests for clarification/interpretation approved since 2013 plenary meeting:

N°	Standard	Title	Subject	Doc N°
1	EN 12586:2007	Soother holder (safety and test)	Ventilation holes for clips (5.1.4.2 (B.11) 6.1.9.2 (Figures 16 and 17)	N 1228
2	EN 1273:2005	Baby walking frames – Safety requirements and test methods	6.6.2.3 "tip over test"	N 1266
3	EN 16120:2012	Chair mounted seat	8.1.2 "removal of the child: case of unintentional locking device"	N 1219
4	EN 1888:2012	Wheeled child conveyances – Safety requirements and test methods	4.5.3 "The protected volume for pram body", 6 "consideration of phthalates" 8.4 "connection point of the cord/string/narrow fabric and location of the connection" 8.9.1.2.1 "brakes"	N 1215
5	EN 14350:2002	Drinking equipment	Clause 8 "Clarify of the text" in Product information	N 1194
6	EN 1400:2013+A1: 2014	Soothers for babies and young children	Clause 6 "Clarify of the text" in Product information	N 1194
7	CEN/TR 16411:2012	2012 compiled interpretations of CEN/TC 252 standards	5.1.4.2 "ventilation holes"	N°1262
8	EN 12586:2007	Soother holder - Safety requirements and test methods	5.1.4.2 "ventilation holes"	N°1262
9	EN 1400:2013+A1: 2014	Soothers for babies and young children	8.3 "axis of shield"	1255
10	EN 1400:2013+A1: 2014	Soothers for babies and young children	Various requests on the use of "should"	

Introduction

This Technical Report contains replies to requests for interpretation and clarifications with regard to the understanding of clauses in the standards elaborated within the CEN/TC 252. The replies concern those requests which have resulted in an interpretation or the decision that no action is necessary.

An interpretation does not have the same status as the text of the standard, nor can it overrule the text of the standard. However, following an interpretation should give assurance that the relevant clause of the standard has been correctly applied. An interpretation will only be regarded as a clarification of the meaning of the standard.

a) Disclaimer:

The interpretations and clarifications have been derived by expert groups of CEN/TC 252. The information contained herein is for guidance only and does not reflect the formal approval by CEN or CEN member bodies. It should be noted that the interpretations are neither part of any standard nor have been referenced in the Official Journal of the European Union.

b) Requests for interpretation:

Requests for interpretations may be submitted by a CEN member body through its national committee or by a CEN/TC 252 liaison (but not directly by an individual or a company) - in accordance with the interpretation protocols agreed by CEN/TC 252. The requests are then channelled to the relevant CEN/TC 252 working group which will deal with the request.

A request for an interpretation may lead to:

1) an interpretation of the standard:

this should reflect a reasonable interpretation of how the standard should be used, while taking into account:

- i) the wording of the standard;
- ii) the rationale of the standard;
- iii) the history of the standard;

2) a no-action decision:

this is applicable when it is agreed that the standard appropriately specifies how a child care article should be assessed;

3) a proposal for an amendment of the standard:

this is applicable when it is agreed that the standard is deficient in some way.

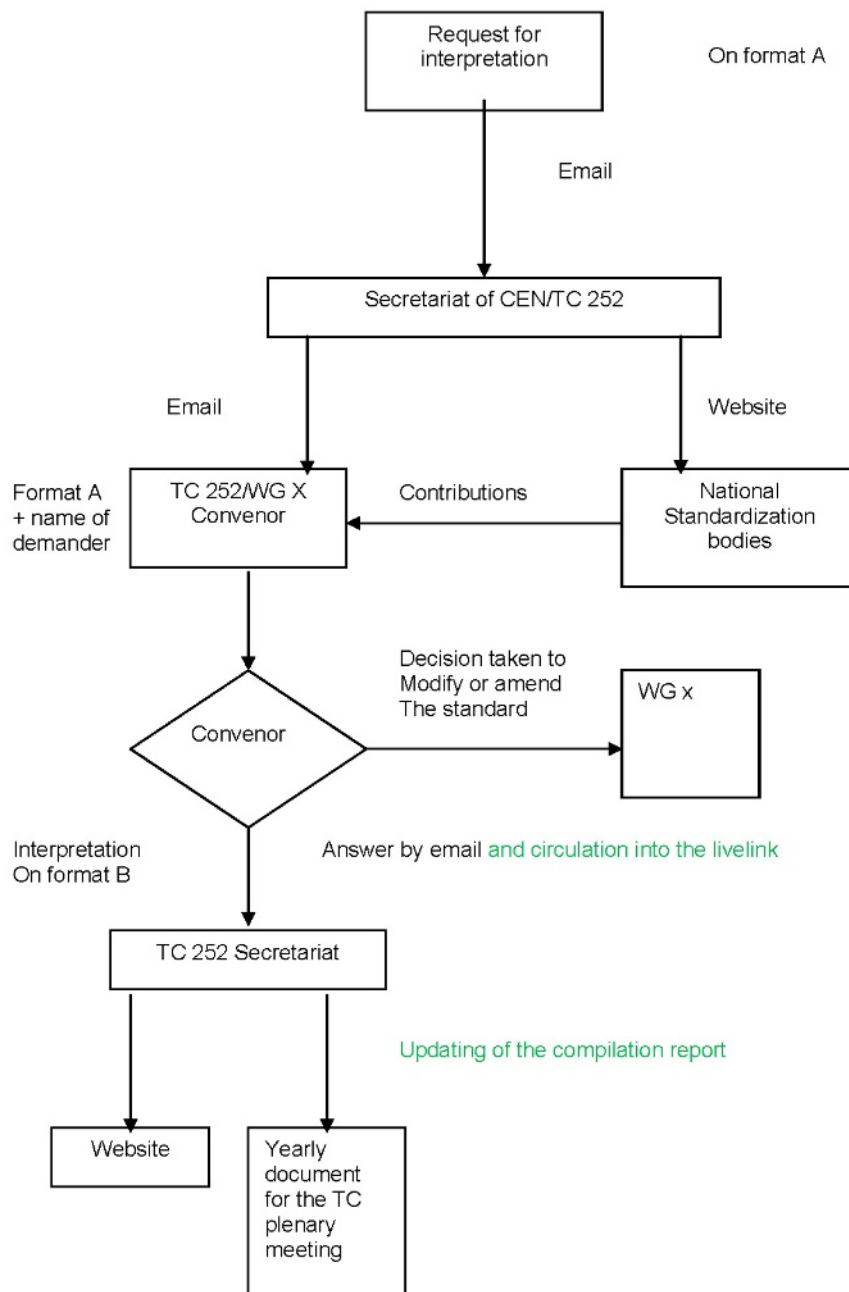
NOTE Interpretations are published in CEN/TR 16411, which will be updated on a regular basis.

Proposals for amendments will be progressed as new work item proposals in accordance with CEN rules.

c) Answers to requests for interpretations:

Since requests for interpretations are submitted through a CEN member body, it is assumed that the member body will keep itself informed about decisions concerning the request and its progress and will itself inform the originator of the request as appropriate.

FLOW CHART



31/05/2012

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 1400-3:2002, *Child use and care articles — Soothers for babies and young children — Part 3: 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*.
- CEN/TR 16411:2012, *Child use and care articles - 2012 compiled interpretations of CEN/TC 252 standards*

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.	

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-caster 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.

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°
4.5.3	Various requests	2
8.9.1.2.1	Uses of "stop" for parking	3

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	Yes phthalates as other hazardous substances

N°	Clause/ Subclause/ Annex	Question	Reply
		for that? Is this requirement mentioned in some other required source?	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 ~~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 below) 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.

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 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 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°
6.4.1.3.		1/2012

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.

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

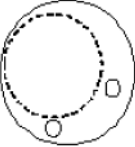
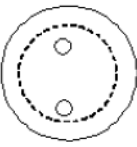
Table 7 — Summary table of the request for interpretations classified in the order of the clauses/subclauses of EN 12586:2007

Clause/Subclause	Title	Interpretation n°
5.1.10	Permanent fasteners	1
3.9	ventilation hole	3
5.1.4.2	Ventilation holes	3
5.1.4.2	Migration of certain elements	4
5.1.4.2 and B.10	Surface dimension and ventilation holes	5
5.1.4.2	Hole for soother older when dealing with toy functions	6
5.1.4.2	25 mm diameter circle for ventilation hole needs?	6
5.1.12.4 and 5.1.4.2	Hole for soother older when dealing with toy functions	7
5.1.4.2	Ventilation holes	8

Table 8 — Table of the request for interpretation/clarification for EN 12586:2007

N°	Clause/ Subclause/ Annex	Question	Reply
1	5.1.10	This subclause does not specify the checking condition of the product. If there is a movable part on the holder that can be placed over a hole of the fastener, over part of a hole of the fastener in a way to reduce the passage, shall the operator check this subclause with the movable part in all possible positions, in all possible positions when in use, in the positions given in the instruction for use, in the most onerous condition?	The final opinion of CEN/TC 252/WG 5 is reported in Annex C of the current document.
3	3.9 and 5.1.4.2	The main purpose of the clarification requested in Annex A is to seek guidance regarding ventilation holes in soother holder	There were no requirements in EN 12586:2007 which would suggest a failure of the examples given in the ASI

N°	Clause/ Subclause/ Annex	Question	Reply
		fasteners, which do not necessarily follow the examples provided in EN 12586:2007. In addition the question is posed whether it is possible for a ventilation hole, which entirely meets the dimension requirements of EN 12586:2007, to have another function – such as a facility to attach a strap. (see details in Annex B)	Interpretation request. The final opinion of WG 5 is reported in Annex B of the current document.
4	6.2.1	The application of the analytical correction of EN 71–3 is not clear for the EN 1400–3:2002, EN 12586:2007, EN 14350–2:2004 and EN 14372:2004. Do the analytical results shall be adjusted by subtracting the analytical correction in Table 2 of EN 71–3 standard?	TC 252 WG5 follows in all of its standards the principles of determination of certain elements as given in EN 71–3. Therefore we agree that the analytical results should be corrected as explained in EN 71–3:1995 (4.1 and 4.2) even though this maybe not stated specifically in some TC 252 WG5 standards.
5	5.1.4.2 and B.10	Subclause 5.1.4.2 states that any permanent fastener which protrudes past the base of guides 1 and 2 shall be provided with ventilation holes. Subclause 5.1.4.2 also states that any surface area encompassing a 25mm diameter circle shall include at least one ventilation hole. 1) Does it mean that if the surface on a fastener, which protrudes past the base of guides 1 and 2, does not encompass a 25mm diameter circle, and then no ventilation hole is required on this fastener? 2) If the reply is “yes”, then how to consider the following extract of B.10: “It is considered that if any fastener or supplementary component is bigger than guides 1 and 2, then the risk of stuck in mouth and stuck in throat is minimal. Therefore a provision for ventilation hole is not required. However, if these objects are smaller than guides 1 and 2, then ventilation holes need to be provided. ? This last sentence seems to indicate that ventilation holes are required provided the fastener protrudes past the base of guides 1 and 2, and without considering the presence or not of a surface of 25 mm diameter.	The answer to 1) is No. The first and primary requirement (5.1.4.2) is for ventilation holes when any permanent or detachable fastener or any permanent or detachable supplementary component protrudes past the base of guides 1 and 2. This is regardless of whether there is a surface encompassing a 25 mm diameter circle. The rest of the clause describes the requirements for these ventilation holes and includes: “Any surface area encompassing a 25 mm diameter circle shall include at least one ventilation hole.” If the permanent or detachable fastener or permanent or detachable supplementary component protrudes past the base of guides 1 and 2, and is less than 25 mm diameter it shall still have a minimum of two 4 mm ventilation holes or one 12 mm hole as described in 5.1.4.2. If the permanent or detachable fastener or permanent or detachable supplementary component protrudes past the base of guides 1 and 2, and is more than 25 mm diameter, then one of the ventilation holes shall be included in any 25 mm diameter circle. This is prevent manufacturers placing ventilation holes at the very edge of the fastener for

N°	Clause/ Subclause/ Annex	Question	Reply
		Note that B.10 does not explain the rationale for the surface of 25 mm diameter.	example as shown in Example 1:  Example 1 In Example 2, wherever the 25 (dotted) circle is drawn, at least one of the ventilation holes is included.  Example 2 The 25 mm diameter circle requirement appears in the original standard (EN 12586:1999) and in every subsequent revision. Therefore as there was no change in EN 12586:2007, a rationale was not outlined. However, the dimension was formulated by considering every soother holder on the market in the late 1990s.
6	5.1.4.2	This requirement is difficult to apply when assessing this kind of soother holder:	Question 1: We were interested to note the comment from AFNOR: “...was it the intention of WG5 to fail such products?” Although EN 12586:2007 makes several references and indeed requirements for soother holders with toy functions, we believe soother holders have a very utilitarian role and therefore do not feel comfortable with soother holders which are designed also to be used as a toy. We also feel that the statement: “there is no safety issue for such components” is not entirely correct when we consider