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Safety of toys — Replies to requests for interpretation of EN 71-1, EN 71-2, and EN 71-8

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National foreword

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

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

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**Safety of toys - Replies to requests for interpretation of EN 71-1,
EN 71-2, and EN 71-8**

Sécurité des jouets - Réponses aux demandes
d'interprétation de l'EN 71-1, l'EN 71-2 et l'EN 71-8

Sicherheit von Spielzeug - Antworten auf Anfragen zur
Interpretation von EN 71-1, EN 71-2 und EN 71-8

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Foreword

This document (CEN/TR 15371:2013) has been prepared by Technical Committee CEN/TC 52 “Safety of toys”, the secretariat of which is held by DS.

Attention is drawn to the possibility that some of the elements of this document may be the subject of patent rights. CEN [and/or CENELEC] shall not be held responsible for identifying any or all such patent rights.

This document supersedes CEN/TR 15371:2009.

Contents

Page

0	Introduction	5
0.1	Interpretations and no-action decisions	5
0.2	Requests for interpretation.....	5
0.3	Answers to requests for interpretations	5
1	Scope	6
2	EN 71-1:2011 - Safety of toys – Part 1: Mechanical and physical properties	6
2.1	3.41 and 3.42 Projectile toys (no action decision).....	6
2.2	3.41, 3.42 and 7.7 Projectile toys (no action decision)	6
2.3	4.3 Flexible plastic sheeting (no action decision)	8
2.4	4.4 Toy bags (no action decision)	9
2.5	4.5 Glass (no action decision)	9
2.6	4.10.1 c) folding and sliding mechanisms (no action decision)	9
2.7	4.14.2 Masks and helmets (no action decision).....	10
2.8	4.15.1.4 Stability (interpretation)	11
2.9	4.15.1.4; 8.23.1 Stability (interpretation).....	11
2.10	4.15.1.6 c) Transmission and wheel arrangement (no action decision).....	14
2.11	4.15.1.6 d) Transmission and wheel arrangement (no action decision)	15
2.12	4.17 Projectiles (no action decision).....	16
2.13	4.19 Percussion caps (no action decision)	18
2.14	4.20 Acoustics (Re: Squeeze toys) (no action decision)	18
2.15	5 Toys intended for children under 36 months (re: inflatable toys) (interpretation)	19
2.16	5.1 General requirements (re: small parts) (interpretation).....	19
2.17	5.1 General requirements (re: small parts) (interpretation).....	19
2.18	5.1 General requirements (re: fuzz) (no action decision)	19
2.19	5.1 General requirements (re: plastic whiskers) (interpretation).....	20
2.20	5.1 General requirements (no action decision)	20
2.21	5.1 e) General requirements (re: glued wooden toys) (no action decision)	21
2.22	5.1 e) General requirements (re: paper, varnish) (interpretation)	21
REQ 092-09 (PKN - Poland).....		22
2.23	5.7 Glass and porcelain (interpretation).....	22
2.24	5.8 Shape and size of certain toys (re: accessibility) (interpretation).....	22
2.25	5.8 Shape and size of certain toys (interpretation)	23
2.26	5.8 Shape and size of certain toys (re: squeeze toys) (no action decision)	23
2.27	5.10 Small balls (no action decision).....	23
2.28	6 Packaging (no action decision).....	27
2.29 7.2 Toys not intended for children under 36 months & 7.3 latex balloons (re: warning) (no action decision).....	27
2.30	8.4.2.2 Seams and materials (interpretation)	28
2.31	8.13 Flexibility of metallic wires (no action decision)	28
2.32	8.23.1 Stability – Toys intended to bear the mass of a child (no action decision)	29
2.33	8.25.1.1 Plastic sheeting - apparatus (interpretation)	29
2.34	8.28.1.3 Mounting (re: acoustics) (no action decision).....	31
2.35	8.28.1.4 Operating conditions (re: acoustics) (interpretation)	31
2.36	8.28.2.4.3 Measurement results (re: acoustics) (interpretation)	31
3	EN 71-2:2011 - Safety of toys – Part 2: Flammability	32
3.1	Applicability of clauses 4.1 to 4.2.5 (supporting document to the revised version of EN 71-2: 2011).....	32
3.2	4.2.2 Beards, moustaches, wigs etc., ... (interpretation)	37
3.3	4.2.5 Flowing elements of toys ... and 4.3 Toy disguise costumes ... (interpretation)	37

3.4	4.3 Toys disguise costumes and toys intended to be worn by a child in play (interpretation)	37
3.5	4.4 Toys intended to be entered by a child (interpretation)	38
3.6	5.4.1 Preparation of test sample (no action decision)	39
3.7	5.4.1 Preparation of test sample (interpretation)	40
3.8	5.4.1 Preparation of test sample (interpretation)	41
4	EN 71-8:2011 - Safety of toys – Part 8: Activity toys for domestic use	42
4.1	4.2.1 Barriers and handrails preventing the child from falling down (no action decision)	42
4.2	4.3.1 Head and neck entrapment	42
4.3	4.3.1 a) Head and neck entrapment (no action decision)	42
4.4	4.3.2 Entrapment of clothing and hair (no action decision)	43

0 Introduction

0.1 Interpretations and no-action decisions

This Technical Report contains replies to requests for interpretations concerning the understanding of clauses in EN 71-1:2011, EN 71-2:2011 and EN 71-8:2011. The replies concern those requests that have resulted in an interpretation or a decision that no action is required as the standard is sufficiently clear.

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

Disclaimer

The interpretations have been derived by expert groups of CEN/TC 52. The information contained herein is for guidance only and does not reflect the formal approval by CEN or CEN member bodies. It should be noted that the interpretations are neither part of any standard nor have been referenced in the Official Journal of the European Union.

0.2 Requests for interpretation

Requests for interpretations may be submitted by a CEN member body through its national committee or by a CEN/TC 52 liaison (but not directly by an individual or a company) - in accordance with the interpretation protocols agreed by CEN/TC 52. The requests are then channelled to the relevant TC 52 working party, which will then deal with the request.

A request for an interpretation may lead to

a) *An interpretation of the standard*

This should reflect a reasonable interpretation of how the standard should be used, taking into account

- the wording of the standard
- the rationale of the standard
- the history of the standard

b) *A no-action decision*

This is applicable when it is agreed that the standard appropriately specifies how a toy shall be assessed.

c) *A proposal for an amendment of the standard*

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

NOTE Interpretation and no-action decisions are published in CEN/TR 15371, which will be updated on a regular basis.

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

0.3 Answers to requests for interpretations

Since requests for interpretations are submitted through a CEN member body, 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.

1 Scope

The purpose of this Technical Report is to provide replies to requests for interpretations of EN 71-1:2011, *Safety of toys – Part 1: Mechanical and physical properties*, EN 71-2:2011, *Safety of toys – Part 2: Flammability* and EN 71-8:2003, *Safety of toys – Part 8: Activity toys for domestic use*.

2 EN 71-1:2011 – Safety of toys – Part 1: Mechanical and physical properties

2.1 3.41 and 3.42 Projectile toys (no action decision)

Question

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

3.41

projectile toy with stored energy

toy with a *projectile* propelled by means of a discharge mechanism capable of storing and releasing energy

3.42

projectile toy without stored energy

toy with a *projectile* discharged by the energy imparted by a child

An example - a toy where the energy is imparted by e.g. a spring or an elastic band and the launching is entirely controlled by the child, as the toy has no mechanism for holding back the projectile and storing the energy for a prolonged time. Such a toy could be interpreted not to be included in 3.42. However, the toy is obviously also not within 3.41 because we interpret 3.41 so that the toy must be capable to accumulate and store the energy for a prolonged period of time without involvement of a child.

We would like to have a confirmation that a projectile toy, which cannot accumulate and store energy is within 3.42 even if a spring is used in launching the projectile.

We suggest rewording 3.42 to make this clear.



Reply

Standard is clear. In this case, the energy is not stored and released by a discharge mechanism but the energy is imparted by the user. In consequence, this toy is regarded as a “projectile toy without stored energy”

REQ 064-06 (DS, Denmark)

2.2 3.41, 3.42 and 7.7 Projectile toys (no action decision)

Question