

PD CEN/TR 15371-1:2015



BSI Standards Publication

Safety of toys — Interpretations

Part 1: Replies to requests for interpretation
of EN 71-1, EN 71-2, EN 71-8 and EN 71-14

bsi.

...making excellence a habit.™

National foreword

This Published Document is the UK implementation of CEN/TR 15371-1:2015. It supersedes PD CEN/TR 15371:2013 which is withdrawn.

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

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

This publication does not purport to include all the necessary provisions of a contract. Users are responsible for its correct application.

© The British Standards Institution 2015.

Published by BSI Standards Limited 2015

ISBN 978 0 580 90655 8

ICS 97.200.50

Compliance with a British Standard cannot confer immunity from legal obligations.

This Published Document was published under the authority of the Standards Policy and Strategy Committee on 31 October 2015.

Amendments/corrigenda issued since publication

Date	Text affected
-------------	----------------------

TECHNICAL REPORT

CEN/TR 15371-1

RAPPORT TECHNIQUE

TECHNISCHER BERICHT

October 2015

ICS 97.200.50

Supersedes CEN/TR 15371:2014

English Version

Safety of toys - Interpretations - Part 1: Replies to requests for interpretation of EN 71-1, EN 71-2, EN 71-8 and EN 71- 14

Sécurité des jouets - Interprétations - Partie 1:
Réponses aux demandes d'interprétation de EN 71-1,
EN 71-2, EN 71-8 et EN 71-14

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

This Technical Report was approved by CEN on 12 October 2015. It has been drawn up by the Technical Committee CEN/TC 52.

CEN members are the national standards bodies of Austria, Belgium, Bulgaria, Croatia, Cyprus, Czech Republic, Denmark, Estonia, Finland, Former Yugoslav Republic of Macedonia, France, Germany, Greece, Hungary, Iceland, Ireland, Italy, Latvia, Lithuania, Luxembourg, Malta, Netherlands, Norway, Poland, Portugal, Romania, Slovakia, Slovenia, Spain, Sweden, Switzerland, Turkey and United Kingdom.



EUROPEAN COMMITTEE FOR STANDARDIZATION
COMITÉ EUROPÉEN DE NORMALISATION
EUROPÄISCHES KOMITEE FÜR NORMUNG

CEN-CENELEC Management Centre: Avenue Marnix 17, B-1000 Brussels

Contents

Page

European foreword.....	5
0 Introduction	6
0.1 Interpretations and no-action decisions	6
0.2 Requests for interpretation.....	6
0.3 Answers to requests for interpretations	7
1 Scope	8
2 EN 71-1:2014, Safety of toys – Part 1: Mechanical and physical properties	8
2.1 3.12 Cord (no action decision)	8
2.2 3.30 Fuzz (no action decision).....	8
2.3 3.33 Large and bulky toy (interpretation).....	9
2.4 3.47 and 3.48 Projectile toys (no action decision).....	11
2.5 3.47, 3.48 and 7.7 Projectile toys (no action decision).....	12
2.6 4.3 Flexible plastic sheeting (no action decision)	13
2.7 4.4 Toy bags (no action decision).....	14
2.8 4.5 Glass (no action decision)	14
2.9 4.9 Protruding parts (interpretation)	14
2.10 4.10.1 c) folding and sliding mechanisms (no action decision)	15
2.11 4.10.3 Hinges and rationale A.13 (interpretation)	16
2.12 4.11 Mouth-actuated toys and other toys intended to be put in the mouth (interpretation)	17
2.13 4.14.2 Masks and helmets (no action decision)	18
2.14 4.15.1.2 Warnings and instructions for use (no action decision).....	19
2.15 4.15.1.4 Stability (interpretation).....	20
2.16 4.15.1.4; 8.23.1 Stability (interpretation)	20
2.17 4.15.1.6 c) Transmission and wheel arrangement (no action decision).....	23
2.18 4.15.1.6 d) Transmission and wheel arrangement (no action decision)	24
2.19 4.15.5.7 Toy scooters – protruding parts (interpretation)	25
2.20 4.17 Projectiles (no action decision).....	25
2.21 4.18 Aquatic toys and inflatable toys (no action decision)	27
2.22 4.18 Aquatic toys and inflatable toys (interpretation).....	28
2.23 4.19 Percussion caps (no action decision).....	28
2.24 4.20 Acoustics (Re: percussion toys) (no action decision).....	28
2.25 4.20 Acoustics (interpretation)	29
2.26 4.20 Acoustics (interpretation)	30
2.27 4.20 Acoustics (interpretation)	31
2.28 4.20 Acoustics (no action decision)	32
2.29 4.20 Acoustics (interpretation)	33
2.30 4.20 Acoustics (interpretation)	33
2.31 4.20 Acoustics (interpretation)	34
2.32 4.20 Acoustics (interpretation)	34
2.33 4.20 Acoustics (interpretation)	36
2.34 4.20 Acoustics (interpretation)	36
2.35 4.20 Acoustics (interpretation)	37
2.36 4.20 Acoustics (interpretation)	38

2.37	Clause 5 Toys intended for children under 36 months (re: inflatable toys) (interpretation).....	39
2.38	5.1 General requirements (re: small parts) (interpretation).....	39
2.39	5.1 General requirements (re: small parts) (interpretation).....	40
2.40	5.1 General requirements (re: fuzz) (no action decision)	40
2.41	5.1 General requirements (re: plastic whiskers) (interpretation).....	40
2.42	5.1 General requirements (no action decision).....	41
2.43	5.1 General requirements (no action decision).....	42
2.44	5.1 General requirements (no action decision).....	43
2.45	5.1 e) General requirements (re: glued wooden toys) (no action decision)	43
2.46	5.1 e) General requirements (re: varnish) (interpretation).....	43
2.47	5.2 Soft-filled toys and soft-filled parts of a toy (no action decision)	43
2.48	5.4 Cords, chains and electrical cables in toys (no action decision)	44
2.49	5.4 Cords, chains and electrical cables in toys (interpretation).....	45
2.50	5.4 g) Cords, chains and electrical cables in toys (interpretation).....	46
2.51	5.7 Glass and porcelain (interpretation)	48
2.52	5.8 Shape and size of certain toys (re: accessibility) (interpretation)	49
2.53	5.8 Shape and size of certain toys (interpretation).....	49
2.54	5.8 Shape and size of certain toys (re: squeeze toys) (no action decision).....	49
2.55	5.8 Shape and size of certain toys (interpretation).....	50
2.56	5.8 Shape and size of certain toys (no action decision)	50
2.57	5.10 Small balls (no action decision).....	51
2.58	5.12 Hemispheric-shaped toys (no action decision).....	54
2.59	Clause 6 Packaging (no action decision)	55
2.60	7.1 Warnings, markings and instructions for use - General (no action decision)	55
2.61	7.1 Warnings, markings and instructions for use - General (no action decision)	56
2.62	7.2 Toys not intended for children under 36 months and 7.3 latex balloons (re: warning) (no action decision).....	56
2.63	8.4.2.2 Tension test - Seams and materials (interpretation).....	57
2.64	8.4.2.2 Tension test - Seams and materials (interpretation).....	57
2.65	8.5 Drop test and 8.7 Impact test (interpretation).....	58
2.66	8.13 Flexibility of metallic wires (no action decision)	59
2.67	8.23.1 Stability - Toys intended to bear the mass of a child (no action decision)	59
2.68	8.25.1.1 Plastic sheeting - apparatus (interpretation).....	60
2.69	8.28.2 Test procedures (re: acoustics) (no action decision).....	62
2.70	8.28.2.1.3, 8.28.2.2.3, 8.28.2.3.3, 8.28.2.11.3 Operating conditions and measurements (re: acoustics) (interpretation)	62
2.71	8.28.2.2.3, 8.28.2.5.3 Operating conditions and measurements (re: acoustics) (no action decision)	63
2.72	8.28.2.7.3 Operating conditions and measurements (re: acoustics) (interpretation).....	63
2.73	8.28.2.9.3 Operating conditions and measurements (re: acoustics) (no action decision).....	64
2.74	8.28.2.11 Voice toys (re: acoustics) (Interpretation)	64
2.75	8.28.2.11.4 Voice toys - measurement results (interpretation)	66
2.76	General interpretation and guidance document for the application of the acoustic requirements from EN 71-1:2014.....	66
2.76.1	Acoustic interpretations	66
2.76.2	Explanation of requirements for time-averaged sound	67
2.76.3	Explanation of requirements for peak sound.....	73
2.76.4	Particular cases	73
3	EN 71-2:2011+A1:2014 Safety of toys - Part 2: Flammability.....	73
3.1	Applicability of Subclauses 4.1 to 4.2.5.....	73

3.2	4.2.2 Beards, moustaches, wigs etc., ... (interpretation)	80
3.3	4.2.5 Flowing elements of toys ... and 4.3 Toy disguise costumes ... (interpretation)	80
3.4	4.3 Toys disguise costumes and toys intended to be worn by a child in play (interpretation)	81
3.5	4.4 Toys intended to be entered by a child (interpretation).....	81
3.6	5.4.1 Preparation of test sample (no action decision).....	83
3.7	5.4.1 Preparation of test sample (interpretation)	84
3.8	5.4.1 Preparation of test sample (interpretation)	85
4	EN 71-8:2011 Safety of toys - Part 8: Activity toys for domestic use.....	86
4.1	3.7 Forced movement (no action decision)	86
4.2	4.2.1 Barriers and handrails preventing the child from falling down (no action decision)	86
4.3	4.3.1 Head and neck entrapment	87
4.4	4.3.1 a) Head and neck entrapment (no action decision).....	87
4.5	4.3.2 Entrapment of clothing and hair (no action decision)	88
4.6	4.6.7 Suspension connectors and swing devices (no action decision).....	88
4.7	4.6.8.3 Geometry and design of swing elements (no action decision)	90

European foreword

This document (CEN/TR 15371-1:2015) 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 15371:2014.

CEN/TR 15371, *Safety of toys — Interpretations*, is currently composed with the following parts:

- *Part 1: Replies to requests for interpretation of EN 71-1, EN 71-2, EN 71-8 and EN 71-14;*
- *Part 2: Replies to requests for interpretation of the chemical standards in the EN 71-series.*

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 71-1:2014, EN 71-2:2011+A1:2014, EN 71-8:2011 and EN 71-14:2014. 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 CEN/TC 52 working party, which will then deal with the request.

A request for an interpretation may lead to:

a) An interpretation of the standard:

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

- 1) the wording of the standard;
- 2) the rationale of the standard;
- 3) the history of the standard.

b) A no-action decision:

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

c) A proposal for an amendment of the standard:

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

NOTE Interpretation and no-action decisions are published in 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 or a CEN/TC 52 liaison, it is assumed that they will keep themselves informed about decisions concerning the request and its progress and will themselves inform the originator of the request as appropriate.

1 Scope

The purpose of this Technical Report is to provide replies to requests for interpretations of EN 71-1:2014, *Safety of toys — Part 1: Mechanical and physical properties*, EN 71-2:2011+A1:2014, *Safety of toys — Part 2: Flammability*, EN 71-8:2011, *Safety of toys — Part 8: Activity toys for domestic use* and EN 71-14:2014, *Safety of toys — Part 14: Trampolines for domestic use*.

2 EN 71-1:2014, Safety of toys – Part 1: Mechanical and physical properties

2.1 3.12 Cord (no action decision)

Question

The question relates to 3.12 “cord” of EN 71-1.

The standard defines cord as:

“length of flexible textile or non-textile material including *elastic material*, monofilament polymeric material, *tape, ribbon*, rope, *strap*, woven and twisted material and string as well as certain weak and long *springs*”

Soft filled parts of a soft filled toy are not included by the definition of cord. Therefore, the requirements of 5.4 shall not be applied to those parts.

In the example provided, the tail of Figure 1 and the toy of Figure 3 are soft filled, while the tail of Figure 2 is not soft filled, therefore 5.4 is applicable only to the tail of Figure 2. Is it correct?



Figure 1

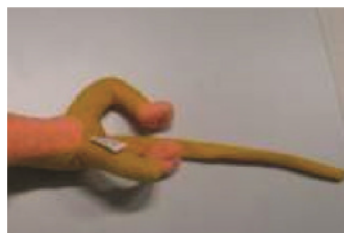


Figure 2



Figure 3

Reply

Standard is clear. Soft-filled parts of toys are not cords as defined in the standard. The tail of the toy in Figure 2 is considered a cord because there is not stuffing material inside.

REQ 104-12 (UNI, Italy)

2.2 3.30 Fuzz (no action decision)

Question

The question relates to 3.30 “fuzz” of EN 71-1.

Some soft filled toys may have fur with long hairs, even longer than 50 mm. We do know that such hairs are not to be considered as monofilament fibres.

If the toy loses these hairs when pet (as per foreseeable use), as in the attached picture, even in great amount, is it correct to consider these hairs included in the definition of fuzz, therefore excluding them from the requirements of 5.1?