



BSI Standards Publication

Safety of toys — Interpretations

Part 2: Replies to requests for
interpretation of the chemical
standards in the EN 71-series

National foreword

This Published Document is the UK implementation of CEN/TR 15371-2:2015.

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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Published by BSI Standards Limited 2015

ISBN 978 0 580 90654 1

ICS 97.200.50

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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
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TECHNICAL REPORT

CEN/TR 15371-2

RAPPORT TECHNIQUE

TECHNISCHER BERICHT

October 2015

ICS 97.200.50

English Version

Safety of toys - Interpretations - Part 2: Replies to requests for interpretation of the chemical standards in the EN 71-series

Sécurité des jouets - Interprétations - Partie 2:
Réponses aux demandes d'interprétation des normes
chimie de la série EN 71

Sicherheit von Spielzeug - Antworten auf Anfragen zur
Interpretation für Normen der EN 71 zu chemischen
Eigenschaften

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

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European foreword

This document (CEN/TR 13571-2:2015) has been prepared by Technical Committee CEN/TC 52 “Safety of toys”, the secretariat of which is held by DS.

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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.*

At the time of publication of this report, CEN/TC 52 had only received, and replied to, a few requests for interpretation to the chemical standards in the EN 71 series.

Even though they are few, CEN/TC 52 has decided to publish the replies to these requests for interpretation in CEN/TR 13571-2 to ensure they become publically available to all stakeholders.

0 Introduction

0.1 Interpretations and no-action decisions

This Technical Report contains replies to requests for interpretations concerning the understanding of clauses in the chemical standards in the EN 71 series:

- EN 71-3: Migration of certain elements;
- EN 71-4: Experimental sets for chemistry and related activities;
- EN 71-5: Chemical toys (sets) other than experimental sets;
- EN 71-7: Finger paints — Requirements and test methods;
- EN 71-9: Organic chemical compounds — Requirements;
- EN 71-10: Organic chemical compounds — Sample preparation and extraction;
- EN 71-11: Organic chemical compounds — Methods of analysis;
- EN 71-12: N-Nitrosamines and N-Nitrosatable substances;
- EN 71-13: Olfactory board games, cosmetic kits and gustative games.

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 15371-2, 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 actual chemical standards in the EN 71 series:

- EN 71-3: Migration of certain elements;
- EN 71-4: Experimental sets for chemistry and related activities;
- EN 71-5: Chemical toys (sets) other than experimental sets;
- EN 71-7: Finger paints — Requirements and test methods;
- EN 71-9: Organic chemical compounds — Requirements;
- EN 71-10: Organic chemical compounds — Sample preparation and extraction;
- EN 71-11: Organic chemical compounds — Methods of analysis;
- EN 71-12: N-Nitrosamines and N-Nitrosatable substances;
- EN 71-13: Olfactory board games, cosmetic kits and gustative games.

2 EN 71-3:2013, Safety of toys — Part 3: Migration of certain elements

2.1 4.1 Toy material categories - “stickers” (interpretation)

Question

The question relates to the categorization of “stickers” under 4.1 Toy material categories of EN 71-3.

Stickers are often composed of paper/plastic and glue. Sticky/liquid glue as such falls within category II of the EN 71-3 (liquid or sticky material), while paper/plastic falls within category III (scraped-off material). We have considered two situations:

- stickers already on the toy (glue is not accessible to children since the sticker is already on the toy);
- stickers provided as such to children (glue is accessible once the sticker is removed from its backing).

We would like to know whether the sticker materials in the two above cases shall be considered independently for their categorization (i.e. category II for the glue and category III for the paper) or whether the whole sticker should be considered for the categorization.

Reply

- Stickers which are already placed on the toy (glue is not accessible) should be tested as scraped-off material (polymer/paper: category III).
- Stickers provided as such to the child with possible exposure to the thin sticky part (including temporary tattoos), should also be evaluated according to category III as a whole.

REQ 001-13 (UNI, Italy)

2.2 4.1 Toy material categories - “erasers” (interpretation)

Question

The question relates to the categorization of “erasers” under 4.1 Toy material categories of EN 71-3.

Erasers classified as toys which are made of polymeric material releases some particles when used. In which toy material category should we classify erasers?

Reply

Erasers made of polymeric material and classified as toys (see commission guidance document 15) and their released particles are categorized as category III toy material.

REQ 002-13 (UNI, Italy)

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