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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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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 secretary.

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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 16411:201 2	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.

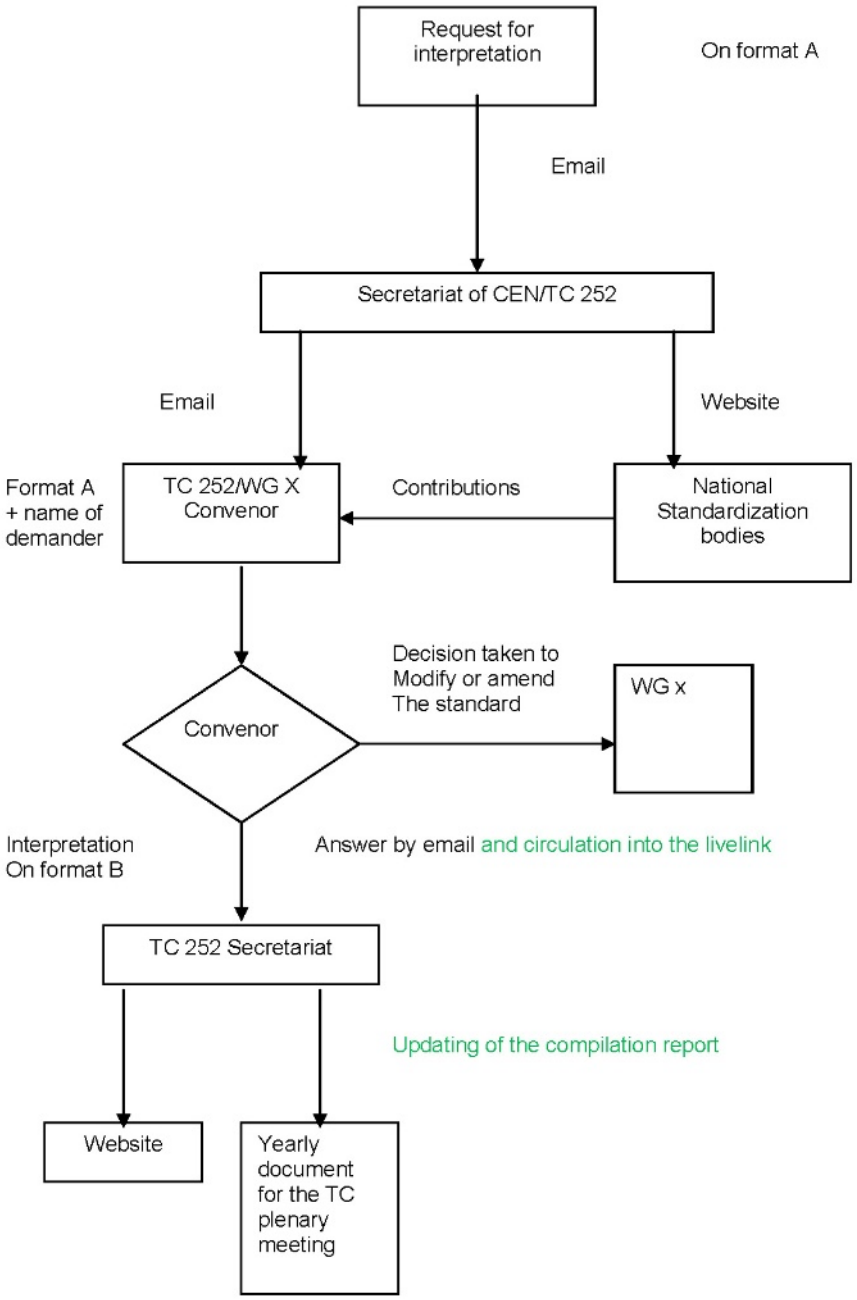
NOTE Interpretations are published in CEN/TR 16411, which will be updated on a regular basis.

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-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.

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 bellow) 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*

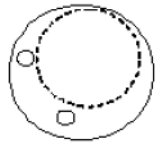
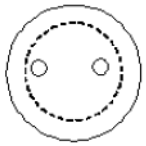
Table 7 — Summary table of the request for interpretations classified in the order of the clauses/subclauses of EN 12586:2007

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

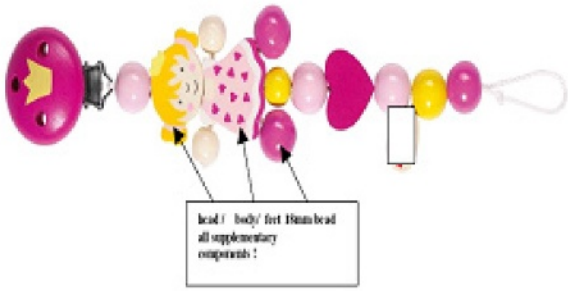
Table 8 — Table of the request for interpretation/clarification for EN 12586:2007

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

N°	Clause/ Subclause/ Annex	Question	Reply
		 **Question 1 :** What are the components of a soother holder concerned by this provision? Is this provision applicable to beads of different shape which form the strap of this soother holder?	the hazard of either permanently attached components or such components becoming detached, entering the child's throat. Specific to the example provided by AFNOR, we feel that such a chain with wooden or plastic parts would be quite heavy and would pull out the soother from the child's mouth quite easily. Although not a direct danger, it is opposite from what is intended for a “simple” soother holder” and perhaps would discourage the carer from using it. That being said, 5.1.4.2 (in summary) states means that every permanent or detachable supplementary component protruding past the base of guides 1 and 2 shall be provided with ventilation holes. A strict interpretation of this clause would mean that every bead and shape as shown in AFNOR's diagram would require ventilation holes which we feel is correct. However, we will reconsider this issue when the soother holder standard comes up for revision.
6	5.1.4.2	**Question 2:** How is the wording “any surface area encompassing a 25 mm diameter circle”? How is this provision applicable to the different shaped beads which form the strap of this soother holder? **Extract of** EN 12586 — **for reference.** *If any permanent or detachable fastener (see 5.1.10 and 5.1.11) or any permanent or detachable supplementary component (see 5.1.12.4 and 5.1.12.5) protrude past the base of guides 1 and 2 (see Figure 15 and Figure 16) when tested in accordance with 6.1.9 it shall be provided with ventilation*	**Question 2 (request of clarification):** We feel it is a relatively simple task to use a 25 cm diameter circle to judge which part of the component requires a ventilation hole. Although, AFNOR has used the term “……apply a 25 mm diameter disc to any component….” This can of course be an open circle (like a ring).

N°	Clause/ Subclause/ Annex	Question	Reply
7	5.1.12.4 and 5.1.4.2	European notified bodies have different requirements for ventilation holes in supplementary components. So we ask for the official and binding regulation for ventilation holes in the body and head of the figure (or other supplementary components) in following design:  **picture 1 – wooden soother holder** **5.1.12.4 Supplementary components permanently attached to the strap or to the fasteners (see B.12)** "…….All supplementary components permanently attached to either the strap or to a fastener shall be tested in accordance with 6.1.9 in combination with the component to which it is attached. When tested in accordance with 6.1.9 if the combined component protrudes past the base of guides 1 and 2, it **shall be provided with a ventilation hole or holes** (see 5.1.4.2)." **1. point of view:** the figure does not protrude past the base of the guides 1 and 2	We have recently answered an almost exact interpretation request from AFNOR. Therefore for conformity, the following answer is the same in all significant respects to that issued previously. 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: "No suffocate on hazard – ventilation holes not required." is not entirely correct when we consider the hazard of either permanently attached components or such components becoming detached, entering the child's throat. Specific to the example provided by DIN, we feel that such a chain with wooden or plastic parts would be quite heavy and would pull out the soother from the child's mouth quite easily. Although not a direct danger, it is opposite from what is intended for a "simple" soother holder" and perhaps would discourage the carer from using it. That being said, 5.1.4.2 (in summary) states means that every permanent or detachable supplementary component protruding past the base of guides 1 and 2 shall be provided with ventilation holes. A strict interpretation of this clause would mean that every bead and shape as shown in the example would require ventilation holes which we feel is correct. However, we will reconsider this issue when the soother holder standard comes up for revision.

N°	Clause/ Subclause/ Annex	Question	Reply
		 **Picture 2** except in the vertical direction: the figure passes through the base of the guides 1 and 2 **1.**  **Picture 3**	

N°	Clause/ Subclause/ Annex	Question	Reply
		 **Picture 4** Our opinion: The parts (supplementary component) of the figure cannot block airways. Conclusion: No suffocation hazard - ventilation holes not required. **2. Point of view:** **5.1.4.2 Ventilation holes (see 3.9 and B.11)** If any permanent or detachable fastener (see 5.1.10 and 5.1.11) or any permanent or detachable supplementary component (see 5.1.12.4 and 5.1.12.5) protrude past the base of guides 1 and 2 (see Figure 15 and Figure 16 when tested in accordance with 6.1.9 it shall be provided with ventilation holes as follows: at least 2 ventilation holes, having a combined total area of at least 40 mm2 and each allowing the .....thickness of the material or an area of at least 115 mm^2 shall be provided. **Any surface area encompassing a 25 mm diameter circle shall include at least one ventilation hole.** 5.1.4.2, sentence 2, will be considered without checking the condition of sentence 1 (protruding of the component): Body and head of the figure have a surface area which includes a	

N°	Clause/ Subclause/ Annex	Question	Reply
		circle with a 25 mm diameter.  **Picture 5** Conclusion of notified bodies: ventilation holes required. Consequence of this view: any supplementary component with a surface area > a circle diameter of 25 mm would require ventilation holes, even if it is so big that it will not fit into a mouth /protrude the guides. **Please explain application of 5.1.4.2, sentence 2, in this respect.**  **Picture 6** The supplementary component do not pass the guide 1 (A) or 2 . Please confirm our understanding of point 5.1.4.2 that each supplementary component from which no part will protrude past the base of guides 1 and 2 shall not have ventilation holes.	

N°	Clause/ Subclause/ Annex	Question	Reply
8	5.1.4.2	The interpretation of the requirements in EN 12586 concerning ventilation hole(s) in supplementary components is not clear. The guideline CEN/TR 16411:2012 provides guidance on the interpretation of this standard. This question refers to 5.1.4.2 of the standard EN 12586 'any surface area encompassing a 25 mm diameter circle shall include at least one ventilation hole.' Guideline CEN/TR 16411:2012 provides multiple replies on questions related to the same 5.1.42. Page 16 and 17 of CEN/TR 16411:2012 states that all components shall include at least one ventilation hole, irrespective of the size of the components. Problem in practice: some Notified Bodies/ AKIs disapprove all soother holders with components, even when the diameters of these components are less than 25 mm. - Does CEN/TC 252 realize that concerning CEN/TR 16411:2012 there shall no longer be any soother holder with components which encompass an area less than 25 mm and have no ventilation holes on the European market? - Does CEN/TC 252 intent to exile all soother holders with components which encompass an area less than 25 mm and have no ventilation holes from the European market? - If this is not the intention of CEN/TC 252, please explain the earlier replies by CEN on the related questions on page 16 and 17 in CEN/TR 16411. Some AKIs nowadays disapprove all soother holders because of literal meanings of the provided replies. **Request**: Write a correction on CEN/TR 16411:2012 to clarify the intention of the provided replies.	This was extensively discussed at a WG5 meeting in Bari on 9 May 2014. It was agreed that previous interpretations as given in Guideline CEN/TR 16411:2012 are correct. It was felt that the two relevant clauses in EN 12586:2007 are: 3.10 supplementary component part attached to the soother holder other than fasteners, press studs or touch-and-close devices 5.1.4.2 Ventilation holes (see 3.9 and B.11) If any permanent or detachable fastener (see 5.1.10 and 5.1.11) or any permanent or detachable supplementary component (see 5.1.12.4 and 5.1.12.5) protrude past the base of guides 1 and 2 (see Figure 16 and Figure 17) when tested in accordance with 6.1.9 it shall be provided with ventilation holes…….. Therefore if the supplementary component (such as a bead) is smaller than guide 1 and 2 (in reality 42,7 mm) it requires ventilation holes as per the requirements given in paragraphs 2–6 of Clause 5.1.4.2. The reference by NEN to: 'any surface area encompassing a 25 mm diameter circle shall include at least one ventilation hole' is only relevant after the first paragraph has been considered. Attention is also drawn to previous comments given in Guideline CEN/TR 16411:2012: 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

N°	Clause/ Subclause/ Annex	Question	Reply
			which are designed also to be used as a toy.

6 00252048 - EN 12790:2009, Child use and care articles — Reclined cradles

Table 9 — Summary table of the request for interpretations classified in the order of the clauses/subclauses of EN 12790:2009

Clause/Subclause	Title	Interpretation n°
5.8.3	Unintentional release of locking mechanism(s)	1

Table 10 — Table of the request for interpretation/clarification for EN 12790:2009

N°	Clause/ Subclause/ Annex	Question	Reply
1	5.8.3	Concerning the paragraph 5.8.3 a) measurement. shall it be realized with or without test mass? Indeed, a mass in the product during measurement can have an even negative positive effect on the mechanisms of locking? In parallel, the paragraph “5.8.1 - general information” can let believe that the test shall be carried out in the 2 configurations (with and without mass in the products). The French standardization committee estimates that paragraph 5.8.2 brings an answer to the 2nd subparagraph of subclause 5.8.1 – General.“Locking mechanism(s) is required to prevent a reclined cradle folding whilst the child is in the cradle and also during the process of a child being put in and taken out of the cradle”. In regard with Subclause 5.8.3 a), the commission estimates that the measurement of the 50 N is to be realized with the mass in the product.	The intention of CEN/TC 252/WG 1 experts was to use 6.6.2 to assess the fulfilment of requirements of 5.8.3 – Unintentional release of locking mechanism(s). The first sentence of 5.8.3 shall be read as: “To avoid the hazards due to unintentional release, when tested in accordance with 6.6.2, the reclined cradle shall not collapse and one of the following conditions shall be fulfilled”:

7 00252049 - EN 12221-1:2008 , Changing units for domestic use — Part 1: Safety requirements

Table 11 — Summary table of the request for interpretations classified in the order of the clauses/subclauses of the EN 12221–1:2008

Clause/Subclause	Title	Interpretation n°
1	Changing tables (additional unit attached to the cot)	7/2012
3.1	Type of “changing unit” covered by standard	2/2012
4.1	Dimensions: Definition of “length”	3/2012
5.11	Confusion in key for Figure 3	4/2012
5.1.3.1		8/2012
5.4	“Wall mounted” refer to ?	5/2012

Table 12 — Table of the request for interpretation/clarification for EN 12221–1:2008

N°	Clause/ Subclause/ Annex	Paragraph/ Figure/ Table/Note	Question	Reply
2	3.1		The 1999 edition covered two types of units which were defined in 3.1.1 and 3.1.2. Why was this distinction, depending on the age of the child, eliminated even though 4.1 in the new edition does refer to type 1 and type 2 ?	Clause 4.1 provides for the distinction of 2 types of changing units also, depending on the age of the child for which the product is intended. The EN 12221–1:2008 will be amended in order to take back the two definitions.
3	4.1		The previous edition defined the length as “the intended longitudinal position of the child”. The elimination of this definition leads to disagreements with manufacturers of some changing units. This also affects the location of the barrier (5.1.1). Was this considered?	The EN 12221–1:2008 will be amended in order to add the following text to 4.1: “The length of the changing area is the intended as the dimension measured along the longitudinal position of the child on the unit. The width of the changing area is the measurement perpendicular to the length.”
4	5.11	Figure 3	Subclause 5.11 Figure 3: “w” is an internal dimension while “l” is an external dimension (the same as in Figure 10 in the previous	The graphic description is purely indicative (the same was in the previous edition).

N°	Clause/ Subclause/ Annex	Paragraph/ Figure/ Table/Note	Question	Reply
			edition). Is there a reason for this differentiation?	Width and length are measured according to 5.2.1 and 5.2.2 of EN 12221–2:2008.
5	5.4		Regarding the last sentence of 5.4, Wall mounted changing units and changing board flaps are excluded from this requirement We understand that “wall mounted” refers to both “changing units” and “changing board flaps”. Is this correct?	No, “wall mounted” refers only to “changing units”. The EN 12221–1:2008 will be amended in order to replace the last sentence by: “Wall mounted changing units and all changing board flaps are excluded from this requirement”.
7	1	Figure 1	The reason of this enquiry is to clarify if the changing tables that are placed on travel cots (combined articles) are in the scope of standard EN 12221: 2008. See example below.  It is clear this product should complies with EN 716 as cot for domestic use, but when a additional changing table is attached to the cot would the standard EN 12221 be applicable to whole product ? We have the impression that the safety requirements and test methods described in EN 12221 would not cover the main hazards of the product taking into account the combined use of this kind of article (one child in the cot and close to changing table without supervision).	The changing units that are part for example of some folding cots are covered under the scope of EN 12221–1, that generally says that “*This part of* EN 12221 *specifies safety requirements for changing units for domestic use for children with a body weight no more than 15 kg.* EN 12221 *only covers the function of the item as a changing unit. If the changing unit can be converted or used as another function it shall comply with other relevant standards, e.g. cots, storage furniture, etc.”* According to the definition in 3.1, a changing unit is an “elevated structure designed to support a child in a lying position for the purpose of allowing a caregiver to change the child’s nappy”: the changing units that are part of folding cots can fit quite well under this definition. Of course the folding cot shall have to comply with any other standard that is applicable to that product due to its functionalities (EN 716 for cot function, EN 12227 if the product can be converted into a playpen, EN 1130 if the product can be converted into a crib, and so on, these are just examples).

N°	Clause/ Subclause/ Annex	Paragraph/ Figure/ Table/Note	Question	Reply
8	5.1.3.1		In the 5.1.3.1 of the EN 12221–1:2008 standard, there are requirements about the head entrapment EN 12221 **Part 1:** **5.1.3 Entrapment of head, neck and torso 5.1.3.1** Within the accessibility zone there shall be no hole, gap or opening larger than 65 mm and less than 223 mm when measured in accordance with 5.3.3.1 of EN 12221–2:2008. EN 12221 **Part 2:** **5.3.3 Entrapment of head, neck and torso 5.3.3.1** Check all holes, gaps and openings within the accessibility zone. Apply the measuring cone of diameter 65 mm (see 4.2) with a force of up to 30 N and if it enters then the head probe 2 (see 4.16.2)shall also enter with a force of up to 5 N. The question is: does the head probe type 2 shall enters completely through, the openings	Proposal: Modify the text as follow: **5.1.3.1** Within the accessibility zone there shall be no hole, gap or opening larger than 65 mm and less than 223 mm when measured in accordance with 5.3.3.1 of EN 12221–2:2008. **5.3.3.1** Check all holes, gaps and openings within the accessibility zone. Apply the measuring cone of diameter 65 mm (see 4.2) with a force of up to 30 N and if it enters then the head probe 2 (see 4.16.2)shall also enter **completely though the opening** with a force of up to 5 N.

8 00252050 - EN 12221-2:2008, *Changing units for domestic use — Part 2: Test methods*

Table 13 — Summary table of the request for interpretations classified in the order of the clauses/subclauses of EN 12221–2:2008

Clause/Subclause	Title	Interpretation n°
4.11	Test beam	1
5.2	Measurement of changing area	1

Table 14 — Table of the request for interpretation/clarification for EN 12221–2:2008

N°	Clause/ Subclause/ Annex	Question	Reply
1	5.2 and 4.11	We have a problem with the test method in EN 12221–2:2008, Changing units for domestic use: Test methods, 4.11 – Test beam, as follows: If we drill holes in the test beam with a diameter of 8 mm so that "the distances between their centre points are equal to the minimum length and width specified in 4.1 of EN 12221-1:2008", and we have a changing area (without sloping sides), where the changing width and / or length are exactly the minimum width and / or length, the two measuring rods will not be able to extend, at all, below the top of the changing surface, and the unit will fail the test and be rejected even though its dimensions are acceptable. We suggest that the words, "centre points" be replaced by "extreme diameter points" or similar wording to avoid this inconsistency. I hope that our explanation is clear.	The intention of the working group was to build the test beam as shown in Figure 7 (5.2.1) with the minimum width/length measured from the external sides of the two rods. The sentence in 4.11 shall be changed as follows: "There shall be pairs of holes with distances between their centre points equal to the minimum length and width specified in 4.1 of EN 12221-1:2008 minus 8 mm, in such a way that the distance between the furthest points of two holes is equal to the minimum length and width specified in 4.1 of EN 12221-1:2008. An additional hole is required at the centre point of the test beam" The wording of 4.11 will be corrected to be in line with the drawing through an amendment to the EN 12221–2:2008.

9 00252054 - EN 1466:2004+A1:2007, *Child care articles — Carry cots and stands — Safety requirements and test methods*

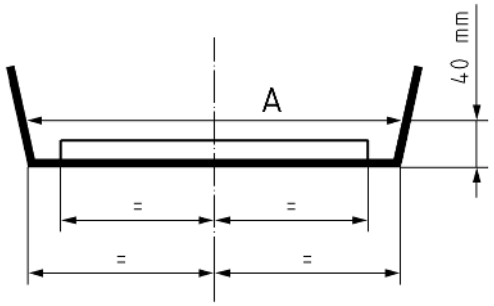
Table 15 — Summary table of the request for interpretations classified in the order of the clauses/subclauses of EN 1466:2004+A1:2007

Clause/Subclause	Title	Interpretation n°
5.1.4	Cords, straps ribbons and other narrow fabrics	1
5.2.1.2	Internal height of rigid carry cot	2 and 6
5.3.5	Castors/Wheels of stands	3
8.1	General	4
Annex A	Order of tests	5

Table 16 — Table of the request for interpretation/clarification for EN 1466:2004+A1:2007

N°	Clause/ Subclause/ Annex	Question	Reply
1	5.1.4	Are the requirements of this clause also applicable to flexible handles of carry cots (see 5.2.2)? If yes, this would limit the total height and make it difficult to carry the cot.	No, they aren't. While working on this standard, we considered that there were no risks concerning the handles. Currently, French laboratories don't apply these requirements on the flexible handles. Of course, this point may be discussed at the next amendment or revision of this standard.
2	5.2.1.2	For a carry cot with an adjustable bottom (to various angles), should the internal height be measured in the flat position or the highest inclined position?	If all the bottom is adjustable the internal height shall be measured at the highest position. If only one part is adjustable (at the head for example) the measurement is only taken from the flat position.
3	5.3.5	This clause does not allow a stand with wheels or castors. However, are wheels and castors allowed if they are used for other purposes and are inactive when used as a stand (such as not being on the bottom of the stand)?	All the products with wheels or castors are not in accordance with this standard even if they are inactive.
4	8.1	To what clause does the last sentence refer to since Clause 7	Yes there is a mistake in this clause . You have to refer to

N°	Clause/ Subclause/ Annex	Question	Reply
		refers to the Order of tests? Does it refer to Clause 8.4? If so, why doesn't the term, “IMPORTANT – Keep for future reference” also appear in Clause 8.4?	Clause 8.4. You can also find the term “IMPORTANT – keep for future reference” (§8.1) in clause § 8.4 but not exactly in the same form: ”IMPORTANT – Read the instructions carefully before use and keep them for future reference”. ⌦ This point will be corrected during the revision of this standard.
5	Annex A	If all the tests are performed on one test sample, are testing per 6.5.2 and 6.5.3 interchangeable since they are both listed under Order 4 in Clause A.1? Also, if several test samples are allowed (such as given in the Notes), what is the importance of the order of testing? In other words, can we test per 6.3, 6.4 and 6.5.1 on one sample but at the same time, perform the remaining tests on another sample without waiting for the results from the first sample?	The order of tests was discussed during the works. We have taken into account some factors: relevance, lead time, laboratory cost, etc . Moreover, It appeared during the discussion that the order of the tests can affect the results. So it’s very important to respect this annex. Concerning the notes, you can use another sample only for the § 4 (material test). The other clauses have to be done on one sample only.

N°	Clause/ Subclause/ Annex	Question	Reply
6	5.2.1.2	There is no test method for measuring the internal length of the carry cot. Specify such test method in order to avoid possible interpretations. Proposal: "XXXX- Measurement of the internal length of the carry cot — Place the test plate subclause XXX on the mattress inside the carry cot, the geometrical centre of the test plate on the geometrical centre of the mattress in the bottom of the carry cot; — Draw a plan at 40 mm above the test plate; — Measure the distance from one end of the carry cot to the other at the plan lengthways level."	The measurement of the internal length of the carry cot is realized as follows:  **Key** A Length **Figure 2 — Measurement of the internal length of the carry cot** If the test plate is sloped, the 40 mm are measured along the lowest point and parallel to the base. This issue will be inserted during the revision of this standard.

10 00252032 - EN 14350-2:2004, *Child use and care articles — Drinking equipment — Part 2: Chemical requirements and tests*

Table 17 — Summary table of the request for interpretations classified in the order of the clauses/subclauses of EN 14350–2:2004

Clause/Subclause	Title	Interpretation n°
4.4	Migration of certain elements	7

Table 18 —Table of the request for interpretation/clarification for EN 14350–2:2004

N°	Clause/ Subclause/ Annex	Question	Reply
7	4.4	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.

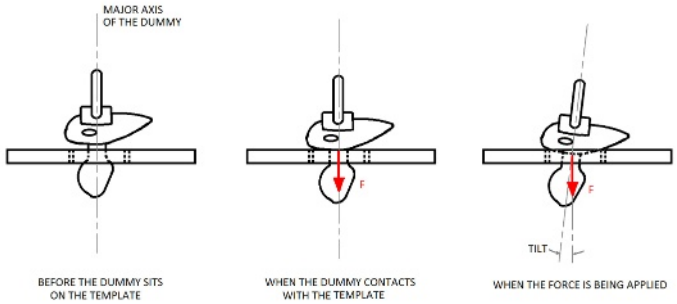
11 00252089 - EN 1400:2013+A1:2014, Child use and care articles - Soothers for babies and young children - Safety requirements and test methods

Table 19 — Summary table of the request for interpretations classified in the order of the clauses/subclauses of EN 1400:2013

Clause/Subclause	Title	Interpretation n°
8.3	Force to apply for the shield	1
8.3	Various requests	2

Table 20 — Table of the request for interpretation/clarification for EN 1400:2013

N°	Clause/ Subclause/ Annex	Question	Reply
1	8.3	Clause 8.3 Shield .....Apply a tensile force of (10 ± 0,5) N to the teat along the direction of the major axis of the soother ensuring that there is no lateral movement causing a pendulum effect. That is, the major axis of the soother shall always throughout the test, be aligned with the centre of the template. Maintain the load for (10 ± 0,5) s. Question: For a soother's shield is not flat (e.g. contour shape), the shield of the dummy will tilt to contact to the template when a tensile force was applied to the teat along the major axis of the soother (as below rightmost figure). When the shield was tilted and contact on the template, the major axis of the soother cannot align to the centre of the template and the direction of the force will also be off the major axis of the soother. Please see below figure or attached for better illustration.	Proposed answer from the requester: In our point of view, the intention of the alignment of the major axis of soother to the centre of the template throughout the test is to prevent the lateral/sideway movement of the shield on the template but not the vertical movement/tilting of the shield. Therefore, the shield should be allowed to tilt and settle on the template when the force is applied on the teat as long as the lateral movement of the shield is prevented on the template. In addition, the downward force should be kept perpendicular to the template throughout the test. **WG 5 reply:** We agree with the Intertek's proposed answer in that the intention of the alignment of the major axis of soother to the centre of the template throughout the test is to prevent the lateral/sideway movement of the shield on the template. This type of movement has in the past caused some false failures. We also agree that the shield should be allowed to tilt and

N°	Clause/ Subclause/ Annex	Question	Reply
		 THE THIRD FIGURE ILLUSTRATES HOW THE UNBALANCED CONTOUR OF THE SHIELD CREATES A NATURAL TENDENCY FOR THE SHIELD TO SETTLE ON THE TEMPLATE IN AN UNCONTROLLED MANNER. WHEN THE FORCE IS APPLIED, THE DIRECTION OF THE FORCE WOULD REMAIN VERTICAL WHICH IS NOT ALONG THE DIRECTION OF THE MAJOR AXIS OF THE DUMMY. Since the alignment of the major axis of soother to the centre of the template throughout the test is a modified test method in EN 1400:2013, we would like to know - if this alignment should also applied on this contour shape pacifier (as we find that it is difficult to keep the alignment when the force is applied on this kind of pacifier). - Also, should the force be adjusted to along the tilted angle of the major axis of soother or should we just keep the downward force perpendicular to the template (it is our finding that it is difficult to measure the tilted angle and adjust the force to align the tilted angle)	settle on the template when the force is applied on the teat as long as the lateral movement of the shield is prevented on the template. Where the design of the shield makes it impossible to apply a force exactly perpendicular along the soother major axis, the force shall be applied to the teat as near perpendicular as is practical.
2		**It is not usual, to have recommendations into a safety standard.** **Are these recommendations requirements?** **If yes, what are the means to assess compliance, are there specific criteria defined?** **8.1 General**	Before answering the queries in more detail we believe 4 important issues should be addressed: 1. EN 1400:2013 is not just a list of safety requirements, but we believe it should also contain recommendations where the manufacturers have some possibilities for innovation. 2. We also believe that a standard should not only be

N°	Clause/ Subclause/ Annex	Question	Reply
		Attention should therefore be made to the design of all soother components to allow the assembled soother to be gripped as easily as possible, thereby facilitating removal of the soother from the child's mouth. Attention should also be made to the design of the soother to ensure that it may be cleaned as easily and as efficiently as possible (see B.3). **8.4 Shield ventilation** Certain types of ventilation holes have given rise to finger injuries. Non-circular holes should avoid acute Vshaped angles or inward facing angles that are not well rounded, as both these features can lead to fingers becoming caught and injured. See also 8.9 **9.2.2.1 Puncture resistance of the teat** For solid teats there is only one wall and a piece of similar material to the teat should be placed under the teat **9.2.2.2 Puncture resistance of knob made of flexible material** Bisphenol A Migration should only be carried out on thermoplastics that use Bisphenol A in their manufacture, such as polycarbonates. Bisphenol A is not used in the production of other common thermoplastics, such as polypropylene and polyethylene. **10.8 Volatile compound content** 10.8.2.2 The Test report (see 14) should show both the analytical and the calculated analytical results **11.5 Openings** Circular holes not meeting this requirement present a risk of restricting circulation. Non-circular holes with acute V-shaped angles or inward facing angles, that are not well rounded, should be avoided.	there for (say) authorities to fail a product, it should also provide information on how to design a safe baby product. 3. It is also quite impossible to put everything into a clear requirement and find the right approved (and validated) test for it – it would increase the length of the standard to unmanageable proportions. 4. Many of the clauses were originally written into the draft for Final Enquiry as notes. But at the insistence of the standard writers these were incorporated as normal text. However, we would be delighted if more experts worked with us to help us develop even better tests and assist us with validation, so they can be included in future standards – not only EN 1400. **8.1 General** We think you have missed the really important sentence: Soothers have been known to become lodged in a child's mouth. Following from this statement the next part of the paragraph clearly forms a design recommendation/guideline. The committee carried out much research in defining and devising a test for “gripability”, but were not able to find anything suitable for all likely conditions; hence the recommendation. We believe the second part of this query is adequately explained in B.3: Attention should be made to the design of the soother to ensure that it may be cleaned easily and efficiently. There are no viable tests to compare one soother model with another in terms of whether one can be more easily cleaned than another. Therefore, the standard can at this stage merely highlight the problem and ensure that manufacturers include sufficient warnings and instructions about cleaning (see 13.3.5).

N°	Clause/ Subclause/ Annex	Question	Reply
		12 Consumer packaging It is recommended that consumer packaging should not contaminate the product in any way. Manufacturers when designing consumer packaging should consider environmental issues, such as disposal instructions and recycling. **13.2 Purchase information** It is recommended that more information relating to possible allergic reactions should be given **13.4 Supply chain information for products that contain vulcanised rubber** Text and symbols should be readily readab	We feel very comfortable with making this recommendation at this point in the standard. **8.4 Shield ventilation** The difficulty of measuring/quantifying V-shaped angles in non-circular holes is very great, as is defining what constitutes a pass or a failure. Therefore we decided to make this a guideline for designers, probably more for new manufacturers, so that they are aware of the likely problem, which is reiterated in 8.9.1. **9.2.2.1** Puncture resistance of the teat and 9.2.2.2 Puncture resistance of knob made of flexible material These phrases are part of the test procedure and therefore requirements. At an appropriate time the wording will be changed to: **9.2.2.1 -** For solid teats there is only one wall and a piece of similar material to the teat shall be placed under the teat. 9.2.2.2 - For solid knobs made of flexible materials there is only one wall and a piece of similar material to the flexible knob shall be placed under the flexible knob. **Table 4 re Bisphenol A** This is a note in a Table and therefore the recommendation is in our opinion, appropriate. There is nothing to stop a test house analysing for Bisphenol A in a non-polycarbonate thermoplastic. We are merely pointing out that BPA is not used to manufacture other plastics. **10.8 Volatile compound content** Actually 10.8.2.3 not 10.8.2.2

N°	Clause/ Subclause/ Annex	Question	Reply
			In 14 Test report it states (in part): Each test report shall include at least the following information, unless the laboratory has valid reasons for not doing so: h) test results with, where appropriate, the units of measurement and relevant clauses; On reflection it may be better to change the phrase to a requirement: The Test report (see 14) shall show both the analytical and the calculated analytical results. This text change will be made at an appropriate time. **11.5 Openings** Similar answer to that given in 8.4 Shield ventilation (above). **12 Consumer packaging** The first part of the query is a recommendation; the fundamental risk should be obvious to a designer. Testing of the packaging for microbiological and/or chemical contamination would put an unnecessary burden on manufacturers and also add a very large section to this standard. In addition many soother samples are sent to testing houses without consumer packaging. The second part is we feel a highly responsible recommendation to packaging designers. **13.2 Purchase information** This is clearly a recommendation. A study carried out by WG5 showed that teats made from

N°	Clause/ Subclause/ Annex	Question	Reply
			natural rubber latex do not cause sensitization, but a previously sensitized child might react to natural rubber. Therefore after several length discussions it was decided to only make one requirement: for products containing natural rubber latex, the following information shall be given: “Produced from natural rubber latex”. **13.4 Supply chain information for products that contain vulcanised rubber** The whole question of readability of instructions and warnings is currently being discussed in WG5 (as well as in many other committees). Text and Symbol size, colour, background etc. Currently we are reviewing visibility and readability in the latest revision of EN 14350 — Drinking Equipment standard. Hopefully, what is decided will be appropriate for a future revision of EN 1400. **7. Printing and Decals** We agree this is a requirement without any explanation of assessment: No form of decoration shall be removed during the boiling stage (see 6.3.2). This small phrase took up a disproportionate amount of time in our discussions. Basically, there are no validated appropriate test procedures. We could of course have added the words: ….when visually inspected. But this would also add a degree of subjectivity. We have to add that no test house or manufacturer have

N°	Clause/ Subclause/ Annex	Question	Reply
			reported a problem associated with the interpretation of this clause.

12 00252024 - EN 14372:2004, *Child use and care articles — Cutlery and feeding utensils — Safety requirements and tests*

Table 21 — Summary table of the request for interpretations classified in the order of the clauses/subclauses of the EN 14372:2004

Clause/Subclause	Title	Interpretation n°
5.1.4.2	Migration of certain elements	3

Table 22 — Table of the request for interpretation/clarification for EN 14372:2004

7	5.1.4.2	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.

13 EN 16120:2012, Child use and care articles - Chair mounted seat

Table 23 — Summary table of the request for interpretations classified in the order of the clauses/subclauses of the EN 16120:2012

Clause/Subclause	Title	Interpretation n°
8.1.2	Force to be measured when intentional removal from the child	1/2013
8.1.2	case of unintentional locking device	

Table 24 — Table of the request for interpretation/clarification for EN 16120:2012

1/2013	8.1.2	To avoid the hazards due to unintentional release of locking mechanisms, one of the following conditions shall be fulfilled before and after testing in accordance with 8.1.3: a) at least one locking mechanism requires an operating force greater than 50 N, or b) at least one locking mechanism is released by the use of a tool, or c) height adjustment requires at least two consecutive actions, the first of which shall be maintained while the second is carried out, or d) height adjustment requires at least two independent and simultaneous actions. Withdraw the child's weight could be considered as one action ? In the a) choice, should we measure the 50 N with a test mass in the product (with no child in the seat, there's no risk) ?	WG1 confirms that removal of the child cannot be considered as an action to release the locking mechanism. If case a) is considered, the measure of the 50N force to release the locking mechanism shall be performed in the most onerous condition (in this case it is recommended to test both without weight and with the maximum allowed weight for the product). In fact, while it is true that without a child in the seat the risk is very low, there might be conditions in which the child may be on the seat but temporarily releasing his/her own weight from the seat (e.g. raising with his/her feet on the adult chair) No. Yes, the 50 N test should be done with a 3 kg and 9 kg test masses.
1/2013	8.1.2	Products that in every position of use have to be removed from the adult chair to adjust the height or to fold the base for storage are excluded from the requirements of this clause. How do you consider a product shall be removed from the adult chair to adjust the height? In the case the instruction manual clearly states it shall be removed from the chair to adjust the height but it is technically possible to do it, what should we consider?	The aim of the last paragraph of 8.1.2 is to exclude only the products that shall be detached from the adult chair to adjust the height or fold the base (e.g. disassemble the product and re-assemble it in another configuration), no matter what the instructions for use say. The need to remove just the child from the product to adjust the height or fold the base is not enough to apply the exclusion.

		Are the unintentional locking device requirements are applicable in the case the child shall be removed from the booster to adjust the height?	Yes. No.

14 00252067 – CEN/TR 16411:2012, Child use and care articles - 2012 compiled interpretations of CEN/TC 252 standards

Table 25 — Summary table of the request for interpretations classified in the order of the clauses/subclauses of EN 12586:2007

Clause/Subclause	Title	Interpretation n°
5.1.4.2	Ventilation holes	1

Table 26 — Table of the request for interpretation/clarification for CEN/TR 16411:2012

N°	Clause/ Subclause/ Annex	Paragraph/ Figure/ Table/Note	Question	Reply
1	4	RI 2 and 3	The interpretation of the requirements in EN 12586 concerning ventilation hole(s) in supplementary components is not clear. The guideline CEN/TR 16411:2012 provides guidance on the interpretation of this standard. This question refers to Clause 5.1.4.2 of the standard EN 12586 'any surface area encompassing a 25 mm diameter circle shall include at least one ventilation hole.' Guideline CEN/TR 16411:2012 provides multiple replies on questions related to the same Clause 5.1.42. Page 16 and 17 of CEN/TR 16411:2012 states that all components shall include at least one ventilation hole, irrespective of the size of the components. Problem in practice: some Notified Bodies/ AKIs disapprove all soother holders with components, even when the diameters of these components are less than 25 mm. - Does CEN/TC 252 realize that concerning CEN/TR 16411:2012 there shall no longer be any soother holder with components which encompass an area less than 25 mm and have no ventilation holes on the European market? - Does CEN/TC 252 intent to exile all soother holders with components which encompass an area less than 25 mm and have no ventilation holes from the European market?	This was extensively discussed at a WG5 meeting in Bari on 9 May 2014. It was agreed that previous interpretations as given in Guideline CEN/TR 16411:2012 are correct. It was felt that the two relevant clauses in EN 12586:2007 are: 3.10 supplementary component part attached to the soother holder other than fasteners, press studs or touch-and-close devices 5.1.4.2 Ventilation holes (see 3.9 and B.11) If any permanent or detachable fastener (see 5.1.10 and 5.1.11) or any permanent or detachable supplementary component (see 5.1.12.4 and 5.1.12.5) protrude past the base of guides 1 and 2 (see Figure 16 and Figure 17) when tested in accordance with 6.1.9 it shall be provided with ventilation holes…….. Therefore if the supplementary component (such as a bead) is smaller than guide 1 and 2 (in reality 42.7 mm) it requires ventilation holes as per the requirements given in paragraphs 2–6 of Clause 5.1.4.2. The reference by NEN to: 'any surface area

N°	Clause/ Subclause/ Annex	Paragraph/ Figure/ Table/Note	Question	Reply
			- If this is not the intention of CEN/TC 252, please explain the earlier replies by CEN on the related questions on page 16 and 17 in CEN/TR 16411. Some AKIs nowadays disapprove all soother holders because of literal meanings of the provided replies. **Request**: Write a correction on CEN/TR 16411:2012 to clarify the intention of the provided replies.	encompassing a 25 mm diameter circle shall include at least one ventilation hole' is only relevant after the first paragraph has been considered. Attention is also drawn to previous comments given in Guideline CEN/TR 16411:2012: 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.

Annex A
(informative)

Interpretation 3 on 3.9 and 5.1.4.2 in EN 12586:2007, *Child use and care articles — Soother holder — Safety requirements and test methods* (WI 00252046)

A.1 Introduction

EN 12586:2007 states (in part):

"**3.9**
ventilation hole (see B.11)
hole of any shape that includes a circular area of at least 4 mm diameter"

"**5.1.4.2**
ventilation holes (see 3.9 and B.11)
If any permanent or detachable fastener (see 5.1.10 and 5.1.11) or any permanent or detachable supplementary component (see 5.1.12.4 and 5.1.12.5) protrude past the base of guides 1 and 2 (see Figure 15 and Figure 16 when tested in accordance with 6.1.9 it shall be provided with ventilation holes as follows:

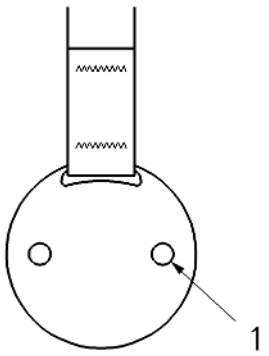
— at least 2 ventilation holes, having a combined total area of at least 40 mm2 and each allowing the unhindered passage of a 4 0 −0,1 mm diameter rod, through the whole thickness of the material shall be provided,

or

— one ventilation hole allowing the unhindered passage of a 12 0,1 + mm diameter rod, through the whole thickness of the material or an area of at least 115 mm2 shall be provided.

Any surface area encompassing a 25 mm diameter circle shall include at least one ventilation hole."

The examples provided as Figures in EN 12586 follow a general, rather simplistic theme, showing two holes in the garment fastener as in Figure A.1.



Key

1 ventilation hole

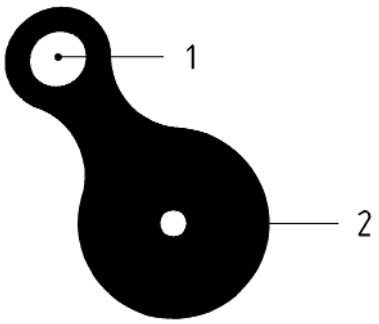
Figure A.1 — Example 1

However, recently soother holders have become more sophisticated and complicated and ventilation holes have been placed in positions not necessarily conforming to the examples given in EN 12586:2007. This has caused a degree of discussion between manufacturers and testing houses and this request seeks some clarification for this general technical issue.

A.2 Examples of possible ventilation holes in more recent models of soother holders

— The part in the garment fastener for connecting the strap has been increased in size to at least 4mm internally or even greater than 12 mm. Even though a strap might be passed through, the hole still accepts either a 4 mm rod or a 12 mm rod. The strap could be permanent or detachable.

Can the hole illustrated by key 1, Figure A.2 be classified as a ventilation hole?



Key

1 “hole” or circle to accept the strap.

2 garment Fastener, with one ventilation hole for example

Figure A.2 — Example 2

Some designs of garment fasteners are much thicker than the fairly “simple” discs shown in EN 12586:2007.

a) Top view **b) Side view**

Key

1 area

Figure A.3 — Example 3

Does the area in Figure A.3 b) constitute a ventilation hole ?

In this example the open area in the depth of the garment fastener may or may not have provision for attaching the strap, either permanently or detachable.

These examples do not necessarily form an exhaustive list. The main purpose of this request is to seek clarification regarding possible ventilation holes somewhat outside the apparent remit of the examples given in EN 12586:2007.

Annex B
(informative)

Reply to interpretation 3 on 3.9 and 5.1.4.2 in EN 12586:2007, *Child use and care articles — Soother holder — Safety requirements and test methods* (WI 00252046)

It is true to say that no standard can adequately describe all possible models of any product on the market.

However, specific to soother holders and ventilation holes the definition given in Definition 3.9 of EN 12586:2007 would seem to be more than adequate for all possible configurations:

"**3.9**

ventilation hole (see B.11)

hole of any shape that includes a circular area of at least 4 mm diameter"

In addition the test method for a ventilation hole (Clause 5.1.4.2) appears to beunequivocal:

……..allowing the unhindered passage of a 4 +0−0,1 mm diameter rod, through the whole thickness of the material……

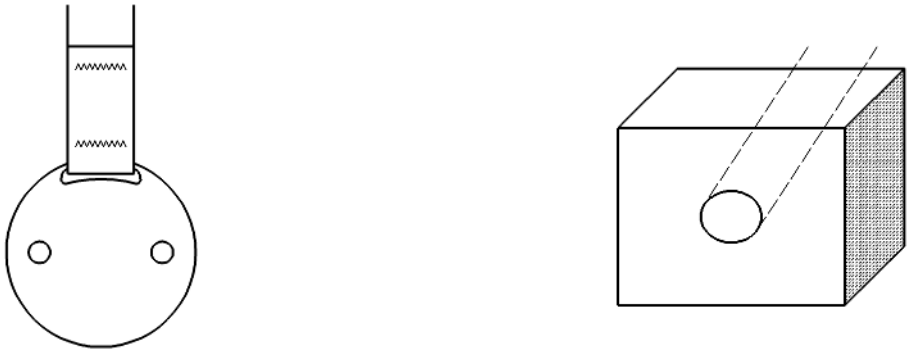
There is no reference in the standard regarding holes used for other purposes, such as for a strap.

Therefore as regards Example 1 of the clarification request (Figure A.1), if the 4 mm diameter rod is capable of an unhindered passage through the whole, even with a strap in place it would pass the requirements of Clause 5.1.4.2 (and therefore meet Definition 3.9).

It is further understood that Example 2 (Figure A.2) of the clarification request has been precipitated by some testers who are used to the common disc-like garment fasteners questioning whether a hole in a thicker structure was indeed a ventilation hole.

There is nothing in the standard that suggests that the thickness of the material may be a factor, only that (in 5.1.4.2) this hole should be: through the whole thickness of the material……

Therefore taking two extremes as illustrated in Figure B.1, t is therefore considered that in both of these cases the hole that goes through the whole thickness of the material (regardless of its thickness) may be considered to be a ventilation hole provided of course it allows the unhindered passage of a 4 mm diameter rod.



a) A simple disc **b) A square of plastic**

Figure B.1 — Illustration by two extremes

At the same time the requirement in 5.1.4.2 should also be met:

Any surface area encompassing a 25 mm diameter circle shall include at least one ventilation hole.

Therefore if the surface area is 25 mm diameter and has a ventilation hole it would meet this requirement. Similarly if the surface are is (for example) 24.9 mm diameter, but no ventilation hole, it would still meet the above requirement.

This implies that although by necessity absolute requirements have been set in EN 12586:2007 relative to, for example ventilation holes, this does not suggest that the closer a particular parameter of the product comes to the requirement, the less “safe” the product becomes. This is because safety margins have been considered and included in the setting of all of these requirements.

In conclusion there appears to be no requirements in EN 12586:2007 which would suggest a failure of the examples given in the ASI Interpretation request.

Annex C
(informative)

Reply to interpretation 1 on 5.1.10 in EN 12586:2007 *Child use and care articles — Soother holder — Safety requirements and test methods* (WI 00252046)

C.1 Ventilation holes in fastener (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 sub clause with the movable part in all possible positions, in all possible positions when in use, in the positions given in the instructions for use, in the most onerous condition?

C.2 Discussion

a) In EN 12586:1999, 5.1.10 Ventilation holes in fasteners states:

   If a fastener passes the “shape and size of certain toys” test in EN 71-1 (test template A and B) there shall be no requirement for ventilation holes to be provided.

   All other fasteners, except those based on press studs or touch-and-close or similar devices (see 5.1.7) shall be provided with a ventilation hole or holes.

   All ventilation holes shall allow the unhindered passage of a 4 mm diameter rod.

   At least 2 ventilation holes, having a total area of at least 40 mm^2 shall be provided, or 1 ventilation hole allowing the unhindered passage of a 12 mm diameter rod or an area of at least 115 mm^2 shall be provided.

   In all cases, any unventilated surface area encompassing of a 25 mm diameter circle shall include at least one ventilation hole.

   If the ventilation holes are less than 12 mm diameter the centres of a minimum of 2 of these holes shall be at least 15 mm apart and their edges shall be at least 5 mm from the edge of the fastener.

   Ventilation holes not allowing the unhindered passage of a 12 mm diameter rod shall comply with the requirements of 5.1.3.

b) Paragraphs 3 in the above clause (“All ventilation holes shall allow….) implies that the definition of a “Ventilation Hole” is a hole that is a minimum of 4 mm diameter. Indeed in the revision of this standard which is currently in the process of final voting the following definition is made:

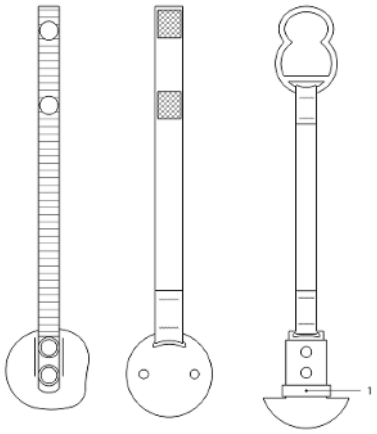
   “3.9 ventilation hole: any shape of hole which includes a circular area of at least 4 mm diameter”

c) Medical literature suggests that a hole of 3 – 3.5 mm diameter will sustain life if the mouth or throat of a young child is blocked. This hole also provides assistance for the extraction of the object with a surgical instrument and prevents negative pressure within the pharynx of the child. However, in case one hole gets blocked in the mouth, this standard requires where applicable, the provision of at least two

ventilation holes each with a circular area of at least 4 mm diameter, in case one gets blocked in the mouth, or at least a single hole of 12 mm diameter.

Therefore, the implication is that this requirement shall be met in whatever the position of any movable part.

d) It is considered that the movable part, such as that shown in the right hand drawing in Figure C.1 shall be moved by hand in all possible positions and all the holes checked for size using the 4 mm or 12 mm diameter rods.



Key

1 movable part

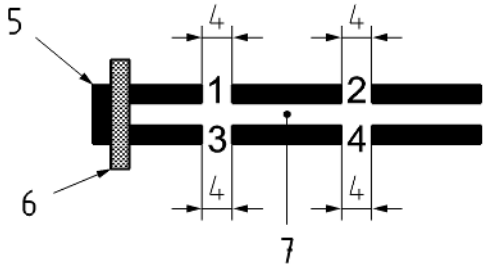
Figure C.1 — Illustration of the movable part

For example in the above Figure C.1 sliding the part upwards may obscure the lower or higher holes shown and thus may block or partly the insertion of the 4 mm diameter rod into one of these holes.

e) As has been stated, all holes have to be checked for size when the movable part is moved into all possible positions. In many cases where a movable part in the form of a slider shown in the above Figure C.1 is present the garment fastener is designed like a clip and the reverse side (not shown) has also to be checked for ventilation holes and any holes or air gaps present between the two arms of the garment fastener.

Such a configuration may be shown in side profile in the following Figure C.2:

Dimensions in millimetres



Key

1, 2, 3, 4	ventilation holes
5	hinge
6	movable part-slider
7	area 1

Figure C.2

This shows that in the fully retracted position the movable part does not obscure any of the 4 ventilation holes, numbered 1 to 4 and Area A extends virtually the whole length of the garment fastener.

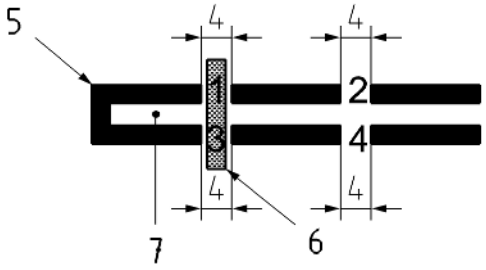
f) The 1999 version of this standard has caused some interpretation difficulties when a ventilation hole was adjacent to another part of the soother holder. In other words are holes 1 and 3, or 2 and 4, separate holes or part of the same (single) hole?

The Plenary Committee CEN/TC 252/WG 5 has decided during their discussions on the review stage of EN 12586 that provided there is an air gap between the holes in the two arms of the fastener, then they should be considered as two separate holes.

Therefore, the text of the latest revision has been amended to include the term: “through the whole thickness of the material”. This means that the testing probe does not have to penetrate further than the immediate hole being tested.

g) Given this interpretation by CEN/TC 252/WG 5 we may see the effect in the example shown in Figure C.3:

Dimensions in millimetres



Key

1, 2, 3, 4	ventilation holes
5	hinge
6	movable part-slider
7	area 1

Figure C.3

In this example the slider has been moved over holes 1 and 3 and this action may result in the 4 mm rod not being able to achieve unhindered passage.

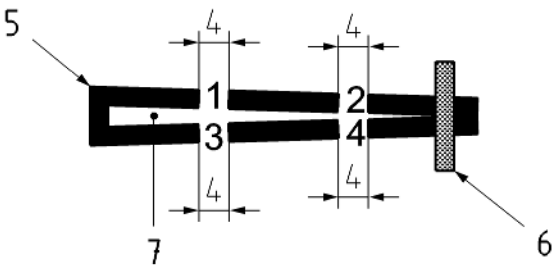
However the provision of at least 2 ventilation holes is still achieved via holes 2 and 4 and Area A, provided Area A allows the passage of a 4 mm rod. Thus holes 2 and 4, together with Area A should be considered when assessing the 40 mm^2 requirement and the " minimum of 2 of these holes shall be at least 15 mm apart and their edges shall be at least 5 mm from the edge of the fastener" requirement.

In other words, we can visualize what may happen if the garment fastener is taken into the mouth by the child. In the positions indicated in both Figures C.1 and C.2, at least 3 ventilation holes are available for breathing and to negate negative pressure.

A similar situation would result if the movable part is slid over holes 2 and 4, leaving holes 1 and 3 and Area A to provide the requirements of (a) all ventilation holes shall allow the unhindered passage of a 4 mm diameter rod and (b) At least 2 ventilation holes, having a total area of at least 40 mm^2 shall be provided.

h) There is one other consideration which can be discussed. In this example, if the movable part is slid to the position whereby the fastener is fully closed Area A still remains between the 2 arms of the fastener:

Dimensions in millimetres



Key

1, 2, 3, 4	ventilation holes
5	hinge
6	movable part-slider
7	area 1

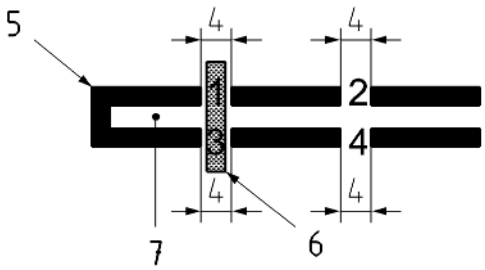
Figure C.4

Of course when assessing any of these holes, finger traps (5.1.3) shall also be considered.

i) As mentioned in C.2 g) above we can visualize what may happen if the garment fastener enters the child's mouth. However in doing that we can see that there is a problem with the way Subclause 5.1.10 in EN 12586:1999 is worded, particularly in respect of the requirement: "If the ventilation holes are less than 12 mm diameter the centres of a minimum of 2 of these holes shall be at least 15 mm apart and their edges shall be at least 5 mm from the edge of the fastener."

Comparing 2 scenarios:

Dimensions in millimetres



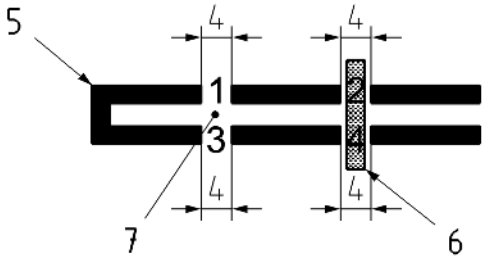
Key

1, 2, 3, 4	ventilation holes
5	hinge
6	movable part-slider
7	area 1

Figure C.5

This is the same as Figure C.3 above. Holes 2, 4 and Area A all permit the passage of a 4 mm rod, the total area is greater than 40 mm2, and for example the centres of Area A and hole 4 are 15 mm apart. Assuming the other provisions are met, this scenario clearly passes the requirements.

Dimensions in millimetres



Key

1, 2, 3, 4	ventilation holes
5	hinge
6	movable part-slider
7	area 1

Figure C.6

In Figure C.6 the slider has been moved over holes 2 and 4. Holes 1 and 3 and Area A permit the passage of a 4 mm rod, the total area is 40 mm^2, but because the size of Area A has increased none of the holes are 15 mm apart. This is despite the fact that the overall ventilation area available to the child if the garment fastener is put into the mouth is at least the same, if not greater than that given in Figure C.5.

Thus, it would seem that increasing the size of the air gap (Area A) could incorrectly cause a failure even though the apparent “safety factor” has not decreased.

It is therefore noted that in the revision of EN 12586, which is ready for final voting, the 15 mm provision has been deleted.

C.3 Final Interpretation

Where a soother holder fastener is provided with a movable part, this part shall be moved in all possible positions and all ventilation holes checked for compliance with 5.1.10. This means that where the movable part is a component of a double armed clip, holes in both arms and the air gaps or spaces between the arms shall be considered and tested.

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[2] P-IEC/TR 62017-1 ed1.0 (2001-04), *Documentation on design automation subjects — Part 1: EDA Industry standards roadmap*

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