

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 - Interpretationen - Teil 1:
Antworten auf Anfragen zur Interpretation von EN 71-
1, EN 71-2, EN 71-8 und EN 71-14

This Technical Report was approved by CEN on 19 April 2021. 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, France, Germany, Greece, Hungary, Iceland, Ireland, Italy, Latvia, Lithuania, Luxembourg, Malta, Netherlands, Norway, Poland, Portugal, Republic of North Macedonia, Romania, Serbia, 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: Rue de la Science 23, B-1040 Brussels

Contents	Page
European foreword.....	5
0 Introduction	6
1 Scope	8
2 Normative references	8
3 Terms and definitions	8
4 EN 71-1:2014+A1:2018, Safety of toys – Part 1: Mechanical and physical properties.....	8
4.1 3.6 Ball (interpretation)	8
4.2 3.13 Cord (no action decision)	9
4.3 3.36 Fuzz (no action decision).....	10
4.4 3.38 Hinge line and 4.10.3 Hinges (no action decision)	11
4.5 3.39 Large and bulky toy (interpretation)	12
4.6 3.54 and 3.55 Projectile toys (no action decision).....	14
4.7 3.54 and 3.55 Projectile toys (no action decision).....	15
4.8 3.61 Definition of soft filled toys (no action decision).....	16
4.9 4.9 Protruding parts (interpretation)	16
4.10 4.10.1 c) folding and sliding mechanisms (no action decision)	17
4.11 Mouth-actuated toys and other toys intended to be put in the mouth (interpretation)....	18
4.12 4.14.2 Masks and helmets (no action decision)	19
4.13 4.15.1.2 Warnings and instructions for use (no action decision).....	20
4.14 4.15.1.4 Stability (interpretation).....	21
4.15 4.15.1.4; 8.23.1 Stability (interpretation)	21
4.16 4.15.1.4 Stability (no action decision)	24
4.17 4.15.1.6 c) Transmission and wheel arrangement (no action decision).....	26
4.18 4.15.5.7 Toy scooters – protruding parts (interpretation)	27
4.19 4.17 Projectile toys (no action decision)	27
4.20 4.19 Percussion caps (no action decision)	28
4.21 4.20 Acoustics (Re: percussion toys) (no action decision).....	28
4.22 Acoustics (interpretation)	29
4.23 4.20 Acoustics (interpretation)	30
4.24 4.20 Acoustics (interpretation)	30
4.25 4.20 Acoustics (no action decision)	31
4.26 Acoustics (interpretation)	32
4.27 Acoustics (interpretation)	33
4.28 4.20 Acoustics (interpretation)	33
4.29 4.20 Acoustics (interpretation)	34
4.30 4.20 Acoustics (interpretation)	35
4.31 4.20 Acoustics (interpretation)	35
4.32 4.20 Acoustics (interpretation)	36
4.33 4.20 Acoustics (interpretation)	37
4.34 Clause 5 Toys intended for children under 36 months (re: inflatable toys) (interpretation)	38
4.35 General requirements (re: small parts) (interpretation)	38
4.36 5.1 General requirements (re: small parts) (interpretation)	39
4.37 5.1 General requirements (re: fuzz) (no action decision).....	39

4.38	5.1 General requirements (re: plastic whiskers) (interpretation).....	39
4.39	5.1 General requirements (no action decision).....	40
4.40	5.1 General requirements (no action decision).....	41
4.41	5.1 General requirements (no action decision).....	42
4.42	5.1 General requirements (interpretation).....	42
4.43	5.1 e) General requirements (re: glued wooden toys) (no action decision).....	44
4.44	5.1 e) General requirements (re: varnish) (interpretation).....	44
4.45	5.2 Soft-filled toys and soft-filled parts of a toy (no action decision).....	45
4.46	5.4.2.1 Cords and chains with the potential to tangle and 5.4.4 Fixed loops, tangled loops and nooses (no action decision).....	45
4.47	5.7 Glass and porcelain (interpretation).....	47
4.48	5.8 Shape and size of certain toys (re: accessibility) (interpretation).....	47
4.49	5.8 Shape and size of certain toys (interpretation).....	47
4.50	5.8 Shape and size of certain toys (re: squeeze toys) (no action decision).....	48
4.51	Shape and size of certain toys (interpretation).....	48
4.52	5.8 Shape and size of certain toys (no action decision).....	49
4.53	5.10 Small balls (no action decision).....	50
4.54	5.12 Hemispheric-shaped toys (no action decision).....	53
4.55	Clause 6 Packaging (no action decision).....	54
4.56	7.1 Warnings, markings and instructions for use – General (no action decision).....	54
4.57	7.1 Warnings, markings and instructions for use – General (no action decision).....	55
4.58	7.1 and 7.2 Warnings, markings and instructions for use: general and toys not intended for children under 36 months (no action decision).....	56
4.59	7.2 Toys not intended for children under 36 months and 7.3 latex balloons (re: warning) (no action decision).....	56
4.60	7.12 Liquid-filled teethingers (interpretation).....	57
4.61	8.4.2.2 Tension test - Seams and materials (interpretation).....	57
4.62	8.4.2.2 Tension test - Seams and materials (interpretation).....	58
4.63	8.5 Drop test and 8.7 Impact test (interpretation).....	59
4.64	8.13 Flexibility of metallic wires (no action decision).....	59
4.65	8.18.2.b) Folding or sliding mechanisms – Toy pushchairs and perambulators (interpretation).....	59
4.66	8.23.1 Stability – Toys intended to bear the mass of a child (no action decision).....	60
4.67	8.25.1.1 Plastic sheeting - apparatus (interpretation).....	61
4.68	8.28.2 Test procedures (re: acoustics) (no action decision).....	63
4.69	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).....	63
4.70	8.28.2.2.3, 8.28.2.5.3 Operating conditions and measurements (re: acoustics) (no action decision).....	64
4.71	8.28.2.7.3 Operating conditions and measurements (re: acoustics) (interpretation).....	65
4.72	8.28.2.9.3 Operating conditions and measurements (re: acoustics) (no action decision).....	65
4.73	8.28.2.11 Voice toys (re: acoustics) (Interpretation).....	65
4.74	8.28.2.11.4 Voice toys – measurement results (interpretation).....	67
4.75	General interpretation and guidance document for the application of the acoustic requirements from EN 71-1:2014+A1:2018.....	67
4.76	8.40 Length of cords, chains and electrical cables (no action decision).....	74
5	EN 71-2:2020, Safety of toys — Part 2: Flammability.....	75
5.1	4.2.2 Beards, moustaches, wigs etc., ... (interpretation).....	75
5.2	4.2.5 Toys to be worn on the head ... and 4.3 Toy disguise costumes ... (no action decision).....	75
6	EN 71-8:2011, Safety of toys — Part 8: Activity toys for domestic use.....	76

6.1	3.1 Activity toy (no action decision).....	76
6.2	4.2.1 Barriers and handrails preventing the child from falling down (no action decision)	77
6.3	4.3.1 Head and neck entrapment (no action decision).....	78
6.4	4.3.1 a) Head and neck entrapment (no action decision).....	78
6.5	4.3.2 Entrapment of clothing and hair (no action decision).....	78
6.6	4.6.7 Suspension connectors and swing devices (no action decision).....	79
6.7	4.6.8.3 Geometry and design of swing elements (no action decision).....	81
	Bibliography.....	82

European foreword

This document (CEN/TR 15371-1:2021) 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 shall not be held responsible for identifying any or all such patent rights.

This document supersedes CEN/TR 15371-1:2017.

Some of the previous interpretations and no action decisions have been deleted or modified, as due to amendments to the corresponding EN 71 standards, answers have become obsolete.

CEN/TR 15371, *Safety of toys — Interpretations*, is currently composed of 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 document contains replies to requests for interpretations concerning the understanding of clauses in EN 71-1:2014+A1:2018, EN 71-2:2020, EN 71-8:2018 and EN 71-14:2018. 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 such that stakeholders can apply it correctly in a conformity assessment. An interpretation is not an assessment of the requirement in the standard - it is only a strict interpretation of the meaning of the text.

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 the CEN/TR 15371 series, 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 document is to provide replies to requests for interpretations of EN 71-1:2014+A1:2018, *Safety of toys — Part 1: Mechanical and physical properties*, EN 71-2:2020, *Safety of toys — Part 2: Flammability*, EN 71-8:2018, *Safety of toys — Part 8: Activity toys for domestic use* and EN 71-14:2018 and *Safety of toys — Part 14: Trampolines for domestic use*.

2 Normative references

There are no normative references in this document.

3 Terms and definitions

No terms and definitions are listed in this document.

ISO and IEC maintain terminological databases for use in standardization at the following addresses:

- IEC Electropedia: available at <http://www.electropedia.org/>
- ISO Online browsing platform: available at <https://www.iso.org/obp>

4 EN 71-1:2014+A1:2018, Safety of toys – Part 1: Mechanical and physical properties

4.1 3.6 Ball (interpretation)

Question

The definition of a ball according to 3.6 is:

“Spherical, ovoid or ellipsoidal object, usually but not always designed or intended to be thrown, hit kicked, rolled, dropped or bounced”.

There is an additional note explaining the ball definition includes multisided objects formed by at least 48 connecting planes into a generally spherical, ovoid or ellipsoidal shape.

What about spherical, ovoid or ellipsoidal objects having small protrusions or projections?

See below some examples of toys intended for children under 3 years of age that have a generally spherical, ovoid, or ellipsoidal shape but in addition have protrusions or projections.

Should they be considered as balls?

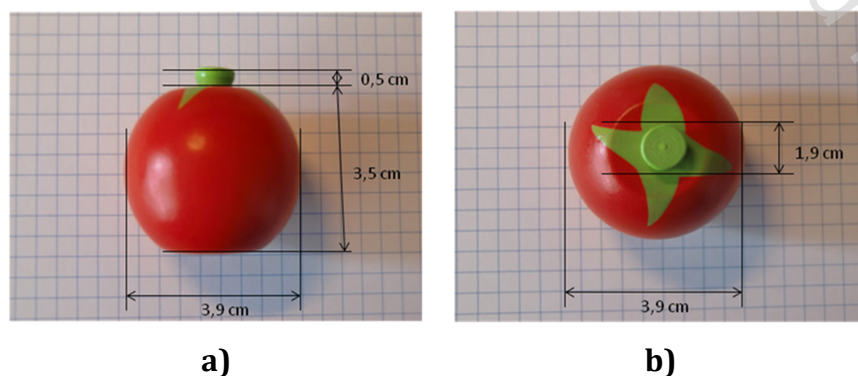


Figure 1