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English Version

## Playground equipment for children - Replies to requests for interpretation of EN 1176:2008 and its parts

Équipements d'aires de jeux pour enfants - Réponses aux demandes d'interprétation aux normes EN 1176:2008 et toutes ses parties

Kinderspielplatzgeräte - Antworten zu Interpretationsanfragen zur EN 1176:2008 und deren Teilen

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# Contents

Page

Foreword.....	3
Introduction .....	4
1 Scope .....	6
2 EN 1176-1:1998, Playground equipment — Part 1: General safety requirements and test method .....	6
2.1 General (interpretation request 2010-09 – SII) .....	6
2.2 Scope (interpretation request 2010-04 SFS) .....	7
2.3 3.5 (interpretation request 2010-02 SFS) .....	7
2.4 4.2 (interpretation request 2011-02 TSI) .....	9
2.5 4.2.4; 4.2.4.4 (interpretation request 2011-04 SNV) .....	10
2.6 4.2.4.4 (interpretation request 2010-01 SFS) .....	11
2.7 4.2.7.2 a) and b) and Annex D (interpretation request 2009-09 SN) .....	11
2.8 4.2.7.3 (interpretation request 2011-03 – SNV) .....	13
2.9 4.2.8.1 Table 2 (interpretation request 2009-04 AFNOR) .....	13
2.10 4.2.8.1 Figure 14 (interpretation request 2009-05 AFNOR) .....	14
2.11 4.2.8.4 (interpretation request 2009-06 DS) .....	15
2.12 4.2.8.5.2 (interpretation request 2010-07 DIN) .....	15
2.13 4.2.8.5.3 (interpretation request 2010-03 SFS) .....	16
3 EN 1176-2:2008 - Playground equipment - Part 2: Additional specific safety requirements and test methods for swings .....	17
3.1 4.2 (interpretation request 2010-06 DS) .....	17
3.2 4.10.1 (interpretation request 2010-05 DS) .....	18
3.3 Annex B (interpretation request 2011-06 DS) .....	18
4 EN 1176-3:2008 - Playground equipment - Part 3: Additional specific safety requirements and test methods for slides .....	20
4.1 4.2 (interpretation request 2011-05 SIS) .....	20
5 EN 1176-4:2008 - Playground equipment - Part 4: Additional specific safety requirements and test methods for cableways .....	20
5.1 4.5 (interpretation request 2009-01 DS) .....	20
6 EN 1176-6:2008 - Playground equipment - Part 6: Additional specific safety requirements and test methods for rocking equipment .....	21
6.1 4.6 (interpretation request 2009-07 DS) .....	21
6.2 4.10 (interpretation request 2009-08 DS) .....	21
6.3 Table 1 (interpretation request 2010-08 CEN/TC 136/SC 1/TG 1) .....	22
7 EN 1176-10:2008 - Playground equipment - Part 10: Additional specific safety requirements and test methods for fully enclosed play equipment .....	22
7.1 4.3.7 (interpretation request 2009-02 DS) .....	22
7.2 4.4.2.4 (interpretation request 2009-03 DS) .....	23
8 EN 1176-11:2008 - Playground equipment and surfacing - Part 11: Additional specific safety requirements and test methods for spatial network .....	23
8.1 Scope, signage (interpretation request 2011-01 – ASI) .....	23

## Foreword

This document (CEN/TR 16396:2012) has been prepared by Technical Committee CEN/TC 136 "Sports, playground and other recreational facilities and equipment", the secretariat of which is held by DIN.

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.

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## Introduction

### Interpretations and no-action decisions

This Technical Report contains replies to requests for interpretations concerning the understanding of clauses in EN 1176:2008 and its parts. 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. However, following an interpretation gives assurance that the relevant clause of the standard has been correctly applied. An interpretation is a clarification of the meaning of the standard.

### Disclaimer

**The interpretations have been derived by expert groups of CEN/TC 136/SC 1 and have been circulated to National Standards Bodies for approval. The information contained herein does not reflect the full 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.**

Requests for interpretations may be submitted by a CEN member body through its national committee or by a CEN/TC 136 liaison (but not directly by an individual or a company) – in accordance with the interpretation protocols agreed by CEN/TC 136/SC 1. The requests are then channelled to the CEN/TC 136/SC 1 interpretation panel, which will then deal with the request.

A request for an interpretation may lead to:

*a) an interpretation of the standard with no action to the standard (no revision and no amendment)*

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.

This is also applicable when it is agreed that the standard appropriately specifies how playground equipment shall be assessed.

*b) a proposal for an amendment of the standard*

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

**NOTE** Interpretation and no-action decisions are published in CEN/TR 16396, 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) a future revision*

This is applicable when the standard is not clear and a suitable amendment cannot be found to fully clarify the question. Further work is needed on existing requirements or new requirements may need to be drafted.

Proposals for a revision will be progressed as a new work item proposal in accordance with CEN rules.

## 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.

The following information requests have been included in this Technical Report:

### 2009

2009-01 DS - Part 4 - 4.5  
 2009-02 DS - Part 10 - 4.3.7  
 2009-03 DS - Part 10 - 4.4.2.4  
 2009-04 AFNOR - Part 1 - 4.2.8.1 Table 2  
 2009-05 AFNOR - Part 1 - 4.2.8.1 Figure 14  
 2009-06 DS - Part 1 - 4.2.8.4  
 2009-07 DS - Part 6 - 4.6  
 2009-08 DS - Part 6 - 4.10  
 2009-09 SN - Part 1 - 4.2.7.2 a) and b) and Annex D

### 2010

2010-01 SFS - Part 1 - 4.2.4.4  
 2010-02 SFS - Part 1 - 3.5  
 2010-03 SFS - Part 1 - 4.2.8.5.3  
 2010-04 SFS - Part 1 - Scope  
 2010-05 DS - Part 2 - 4.10.1  
 2010-06 DS - Part 2 - 4.2  
 2010-07 DIN - Part 1 - 4.2.8.5.2  
 2010-08 CEN/TC 136/SC 1/TG 1 - Part 6 - Table 1  
 2010-09 SII - Part 1 - gGeneral

### 2011

2011-01 ASI - Part 11 - Scope, signage  
 2011-02 TSI - Part 1 - 4.2  
 2011-03 SNV - Part 1 - 4.2.7.3  
 2011-04 SNV - Part 1 - 4.2.4; 4.2.4.4  
 2011-05 SIS - Part 3 - 4.2  
 2011-06 DS - Part 2 - Annex B

NOTE ASI – Austria, DS – Denmark, SFS – Finland, AFNOR – France, DIN – Germany, SII – Israel, SIS – Sweden, SN – Switzerland, TSI – Turkey,

## 1 Scope

The purpose of this CEN Technical Report is to provide replies to requests for interpretations of all parts to EN 1176.

## 2 EN 1176-1:1998, Playground equipment — Part 1: General safety requirements and test method

### 2.1 General (interpretation request 2010-09 – SII)

#### Question

- 1 We would appreciate a formal answer from the TC136/WG in relation to how to test the "rope carousel" and to provide an explanation for the rationale for testing them only according to EN 1176-1 and not according to EN 1176-5?
- 2 During that period our WG discussed the EN 1176-1:2008 standard, and now have a few questions:
  - a) We need to obtain the position regarding the criteria for fire resistance of playground equipment placed mainly in open areas.
  - b) We need to obtain an explanation as to why the instructions for tests of playground equipment in accordance with EN 1021 have been deleted.
  - c) Why are there no clear instructions besides the regulations of the countries as to where the equipment is assembled?
- 3 We are also involved with musical playground equipment (see attached photographs). Would the requirements of EN 1176 be applicable to some of them? Which types would be covered by EN 1176 and which would not? Is there any restriction to placing them in an area together with other playground equipment?

#### Reply

#### No action/interpretation

- 1) A picture of the specific product would be required to make a formal judgement.

EN 1176-1, 4.2.1 confirms; 'Equipment where the primary play function is augmented by a secondary motion, e.g. rocking and/or rotating, shall conform to the additional parts of EN 1176 relating to both play functions, as appropriate, unless the equipment is specifically covered in just one of the additional parts of EN 1176.'

EN 1176-5, scope confirms; 'This document is not applicable to equipment where the main play function is not rotating'.

- 2)

- d) Contained Playground Equipment has the greatest risk and these requirements are now covered in the new EN 1176-10. Other than this the greatest risk is from materials that produce a surface flash effect and would not give time for users to leave the area.
- e) EN 1021 was no longer thought to be necessary as a general requirement, but is still referred to in EN 1176-10.

- f) All countries have different National Regulations, from which no universal requirements could be identified.
- 3) There are no specific requirements in EN 1176 for 'Musical' Playground Equipment. However, EN 1176-1 provides a basis for assessing all types of Playground Equipment. The judgement of when and how much of this specification to apply not only relates to the type of product, but also to where it is provided. In an unsupervised/free access situation, together with other Playground Equipment items, then some assessment to EN 1176 may be helpful.

Comments:

Question 1: Future work required to determine what is relevant for this specific type of product. This would need to be determined by risk assessment.

Questions 2 & 3: No further action required.

## 2.2 Scope (interpretation request 2010-04 SFS)

### Question

**Question 1:** How high should the fence be, if it is used as the sole means of separating the playground from the exercise area?

**Question 2:** If distance alone is used as means of separating the playground from the exercise area, how long should this distance be?

**Question 3:** Can you give any other example of what other means of separating these areas there could be?

### Reply

#### No action/interpretation

The interpretation panel recommend work is started, as a priority, for exercise equipment of this type as it is now being specified in most European countries, in association with children's playground equipment.

The panel advises that when products of this type are installed in association with children's playground equipment it will get used by children, whether intentional or not, because segregating by fencing, for example, does not work as a solution. Therefore, this type of equipment should be designed and provided without unacceptable risks to these children, and comply with relevant requirements in EN 1176, e.g. according to test protocols from accredited test houses, until a new standard is developed.

## 2.3 3.5 (interpretation request 2010-02 SFS)

### Question

3.5 explains that forced movement is "e.g. sliding, swinging, rocking". Different rocking equipment provides different types of movement. This is expressed in the table below: