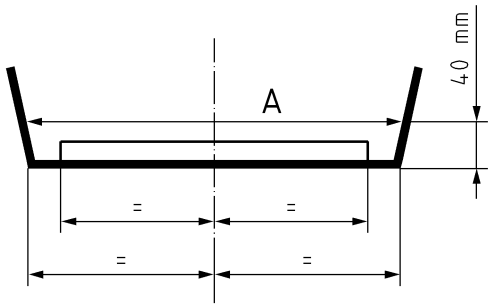
N°	Clause/ Subclause/ Annex	Question	Reply
6	5.2.1.2	There is no test method for measuring the internal length of the carry cot. Specify such test method in order to avoid possible interpretations. Proposal: "XXXX- Measurement of the internal length of the carry cot — Place the test plate subclause XXX 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.

13 00252032 – EN 14350-2:2004, *Child use and care articles — Drinking equipment — Part 2: Chemical requirements and tests*

Table 19 — 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
5.2	Certain elements in a glass bottle	8/2016

Table 20 —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.
8	5.2	We are not sure how to test migration of certain elements of glass milk bottle. In Clause 5.2.5,"Feeding teats shall be cut length-wise only once. All other components shall be cut, as far as is possible, into pieces of length 4 mm to 6 mm and width not exceeding 6 mm." It seems that glass should be smashed. But in Clause 5.2.1, "The analytical method specified in EN 71-3 has been applied in this document to drinking equipment." According to EN 71-3, glass milk bottle is exempted from migration of elements.	In EN 14350-2:2004 Clause 5.2 has the heading "Determination of the migration of certain elements" and the Principle (Clause 5.2.1) tends to suggest, particularly with the reference to EN 71-3, that migration and ingestion are the same thing, which is clearly not so. We also note that EN 71-3, which you rightly refer to, that glass components are only tested if they fit into the small parts cylinder – that is they can be swallowed and ingested. Clearly this is not the

N°	Clause/ Subclause/ Annex	Question	Reply
		So how to test glass milk bottle?	situation with a glass feeding bottle. Therefore, glass bottles and glass cups cannot be tested according to Clauses 5.2/5.2.5. No other method for chemically testing a glass container exists in EN 14350-2:2004. We are aware of this short coming and in the current revision of EN 14350 which we are working on, we are drafting separate test procedures for ingestible and non-ingestible components. In the case of a glass container, we are currently discussing utilizing ISO 7086-1:2000, Glass hollowware in contact with food — Release of lead and cadmium. In this ISO Standard glass surfaces are placed in contact with 4 % (V/V) acetic acid solution for 24 h at 22 °C to extract lead and/or cadmium, if present, from the surfaces of the articles or test specimens. Therefore we visualize measuring and limiting "true" migration from the surfaces of the glass container without reference to ingestible components.

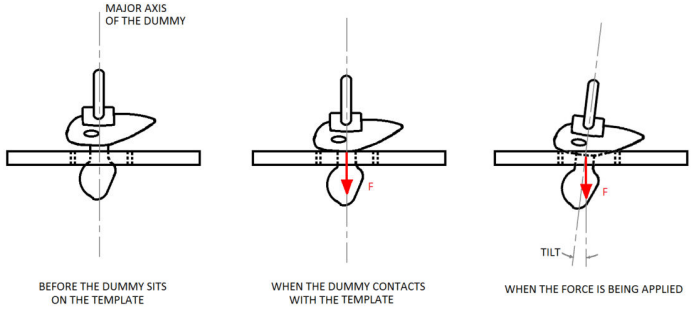
14 00252089 – EN 1400:2013+A1:2014, *Child use and care articles – Soothers for babies and young children – Safety requirements and test methods*

Table 21 — Summary table of the request for interpretations classified in the order of the clauses/subclauses of EN 1400:2013

Clause/Subclause	Title	Interpretation n°
5.2.1	Teat "smooth"	8/2015
6.3	Teat Protector – pre-treatment	9/2015
7	Printing on the shield	14/2016
8.3	Force to apply for the shield	1
8.3	Various requests	2
8.3	Shield template test	6/2014
8.5	Measurement of collapsed ring	11/2015
8.5.2.4 & 8.7.2	Measurement of knobs and rings	12/2016
8.7	Measurement of Knobs	4/2014
8.7.1 & 8.8.1	Knob dimensions	13/2016
8.7.2 & 8.8.2	Measurement of Knobs	5/2014
9.7	Breaks in Test 9.7.2.2. and 9.7.2.3	15/2018
11 & 8.9	Teat Protector and holes	7/2015
11.5	Finger Traps in teat protector	3/2014
13.21 & 14	Use of date of standard	10/2015

Table 22 — 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 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.

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)	
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**	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

N°	Clause/ Subclause/ Annex	Question	Reply
		there specific criteria defined? **8.1 General** 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**	some possibilities for innovation. 2. We also believe that a standard should not only be 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

N°	Clause/ Subclause/ Annex	Question	Reply
		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. **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	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). 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.

N°	Clause/ Subclause/ Annex	Question	Reply
			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 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

N°	Clause/ Subclause/ Annex	Question	Reply
			(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 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