			reads: "The principle is to determine the longest length of the soother holder, which might be a combination of the strap, soother fastener and a supplementary component where present. Therefore the tensile force of (25 ± 2) N shall be applied in such a way that the longest length is achieved. All configurations shall be measured in order to ascertain the longest length excluding the garment fastener." (Accentuation by WG 5 secretariat). It is obvious that the length of the soother holder was and still is the key safety point when the committee drafted the standard at the time. For the working group it was also foreseeable that a child might run around with a soother holder fixed to its clothes but without a soother fixed to the holder. New designs might come up which could be absolutely dangerous, because the open fastener extends the length of the soother holder. Therefore a test of a soother fastener only in the closed position is unsuitable. For testing a clamp may be used for applying the 25 N, but it has to be applied on those points where it has the biggest effect. The current standard does not describe further opportunities of clamping. Interpretation requests serve for clarification of existing standards, and if more test details seem appropriate, the working group has to deal with them in the upcoming revision of the standard.
15	4	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	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

		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? - 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.	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 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°
Scope & 3.1		2/2016
5.8.3	Unintentional release of locking mechanism(s)	1
5.16		3/2017

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	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":

		that the measurement of the 50 N is to be realized with the mass in the product.	
2	Scope & 3.1	En 12790 Reclined cradles defines a reclined cradle as an article intended to accommodate a child in a reclined position. Would the following product fall within scope/definition of a reclined cradle? Rock and play sleeper, the product is intended for overnight sleeping in an inclined position. It can also be used as a playtime seat. As the name indicates the product can rock, and has a 3-point harness. http://fisher-price.mattel.com/shop/en-us/fp/baby-sleepers/ Standard EN 12790– Reclined Cradles was developed in 2000 based on products that existed at that time. It does not address the sleeping function provided by the Fisher-Price Rock and Play sleeper as well as other inclined sleep products. The product complies with ASTM F3118-15 Infant inclined sleep products. This standard is developed taken all hazards into account related to inclined sleeping.	The definition of reclined cradle in EN 12790:2009 is “article intended to accommodate a child in a reclined position”. As the item is intended to accommodate a child in a reclined position, the item falls under the scope of EN 12790. Although at the moment the current scope and definition in the standard capture such a product, it was not the intention of this Committee to include them when it was published in 2009: as a consequence, current requirements of EN 12790 are not adequate to cover such items. Further discussion with TC252 is required to define whether these items shall be included in the revision of EN 12790 (by TC252/WG1) or in a new standard developed by TC252/WG2 (due to the sleeping function being under the scope of WG2).

			
3	5.16	During 2017 a new EN 14988 has been published. Differently from the past the new standard permits to have high chairs with more than two castors / wheels lockable by an adult positive action. Many high chairs on the market comply even with the reclined cradle standard. Clause §5.16 of the EN 12790:2009 requires a slippage test on a glass surface. In the test method there are no reference to the braking system of the wheels but in the general clause (§6.1) is	Clause 6.1, 1st paragraph states: If not otherwise stated, the test methods shall be applied to a reclined cradle assembled and erected in accordance with the manufacturer's instructions. If the instructions for use require the brakes to be activated when the product is used as a reclined cradle, then the most onerous position does not concern the brakes and the brakes shall be activated for the test. Whilst it is true that the slippage test is excluded for high chairs convertible into reclined cradles in the draft of

		required to test the reclined cradle in the most onerous configuration. The most onerous configuration for the slippage test is created positioning the product with all the wheels unlocked. In the prEN 12790 under draft, highchairs convertible in reclined cradle are excluded from the slippage test.	prEN 12790-1 currently under enquiry, the requirement cannot be excluded through a request of interpretation for the currently published standard.

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).	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.

N°	Clause/ Subclause / Annex	Paragraph/ Figure/ Table/Note	Question	Reply
			Was this considered?	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 edition). Is there a reason for this differentiation?	The graphic description is purely indicative (the same was in the previous edition). 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	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

N°	Clause/ Subclause / Annex	Paragraph/ Figure/ Table/Note	Question	Reply
			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).	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).
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.