

**UK INTERPRETATIONS GROUP**

(To be sent to CW/15 for information only)

<b>INTERPRETATION GROUP # 008</b>	<b>REQUEST FOR INTERPRETATION/METHODS</b>	
<b>Standard:</b> EN 62115  <b>Edition:</b> 2005	<b>Clause:</b> 14.7	<b>Date of Request:</b> 07.03.07
	<b>Clause heading:</b> Construction	<b>Source:</b> UK Toys Interpretation Group
<b>Keywords:</b>		
<b>Question:</b> In clause 14.7, batteries for a child under 3 years must not be accessible without the aid of a tool unless “the cover can only be opened after at least 2 independent movements have been simultaneously applied”.  It is unclear as to what is viewed as two independent movements, there has been an occasion where pressing on a tab of the battery has released the batteries but was interpreted by the lab as being compliant.		
<b>Proposer’s Comments for an answer:</b> Discussion on “two independent movements that have to be simultaneously applied”. Agreed that, in order to comply, the operator has to apply two actions to open the cover. The second action must be dependent on the first having been carried out. The test should be carried out with the toy in the most onerous position (e.g. upside down, if necessary).  Note : In the 13138-1 Buoyant aids for swimming instruction standard covering PPE, two independent movements do not include push down and pull out.		
<b>Interpretation Group Comments/Action:</b> Comments: Keith Lister will pass on to the EN 62115 committee for discussion (and will inform CW/15). There have been RAPEX notices. Maybe some useful information in Nursery standards (to be confirmed).		
<b>Status:</b> <b>Forward to BSI:</b> <b>Interpretation Methods</b> <b>Amendment</b> <b>No Further Action</b>		
<p style="color: red;">To be discussed at next CPL 61/21 Committee.</p> <p style="color: red;">Keith Lister to draft a proposal to define 2 independent movements and then forward to Bob Stratton at CPL61/21 BSI Secretariat.</p> <p style="text-align: right; color: red;">/continued</p>		

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4.11.2009 Draft Proposal

4.12.2009 Press or push battery cover access catch, whilst this action is maintained pull battery cover to open.

As an example: One press and push action with the battery cover falling off under its own weight is not considered two simultaneous actions.

19.7.2010 : Issue not raised at BSI meeting in November (KL). In FDIS A2. 62115, the short circuit test is not relevant if you need a tool to open the compartment.

23.7.2010 : It was agreed at the Rationale meeting the following : The actions that constitute two independent simultaneous movements applied by the user do not constitute actions due to gravity or weight of the toy. An example of acceptable independent simultaneous movement would be push and twist movements.

1.8.2011 : EN62115 Fpr AB gives a definition of '2 independent movements'. Close.