

UK INTERPRETATIONS GROUP

The BTHA's interpretations group consisting of BTHA members, test laboratories, manufacturers, importers and retailers has agreed upon the following interpretation.

Interpretation no.	118
Date of publication	December 2016
Standard/Directive	EN 71-2 2011+A1 2014
Clause No	5.5
Clause Title	Test for Soft Filled Toys

Question

The flammability test described in clause 5.5 of EN 71-2:2011+A1:2014, requires measurements to be made from the "top surface of the toy" or the "uppermost toy surface". Presumably these are the same thing in which case, I would like to seek clarification on the following question:

When testing a soft-filled doll with a polymeric rotomoulded head (picture 1) what is considered the top surface of the toy, the top of the polymeric head or the neck which is the top of the soft-filled part of the toy?



Interpretations Group Answer /Action

Since the testing concerns soft-filled toys and soft-filled parts of toys, the burn rate should be calculated over the soft-filled parts only and therefore the top surface of the toy should be understood to mean "top surface of the soft-filled part."

Option 2 is considered to be the correct interpretation.

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Matters to consider which favour this interpretation:

- When determining the orientation for the burn test, it would be anomalous to position the toy so that it offers “the maximum unhindered soft-filled vertical area” and then measure the burn rate inclusive of non-soft-filled parts like the polymeric head.
- The test seeks a most onerous situation i.e. testing with or without clothes, igniting the most flammable element. It would not be a most onerous situation if measurements were made to the top of the polymeric head.
- It is possible that a toy with a rapid burn rate on the soft filled body, self extinguishes when the flames reach the polymeric head. Such a toy would be deemed to self extinguish and so meet the requirements.
- If the top of the polymeric head was considered to be the top surface of the toy, on some designs of dolls, it would be possible to circumvent requirements by ensuring the most flammable material was deliberately positioned about 125 mm from the top of the head such that ignition occurs but the flames soon encounter the polymeric head and self-extinguish.

Note: This interpretation may be subject to amendment pending any related decisions made by CEN