

UK INTERPRETATIONS GROUP

INTERPRETATION GROUP # 21	REQUEST FOR INTERPRETATION/METHODS	
Standard: EN71 Part 1	Clause 4.15.1.6 Part d	Date of Request: 24/7/8
Edition: 2005	Clause heading: Toys propelled by a child	Source: Toys R Us
Keywords: "while being pushed"		
Question: A steer and grow trike that has a parent handle which enables the product to be steered should be constructed to prevent entrapment of a child's feet in the pedals. It states while being pushed, but should this not be why being pulled as this is foreseeable use.		
Proposer's Comments for an answer: To include items being pulled.		
Interpretation Group/Action: The standard states "while being pushed". Being pulled is foreseeable use. The standard is clear – only pushing is to be considered. No need for interpretation. Committee considered the request has some validity and requested this is passed to CEN for a possible standard amendment. Recommended wording includes : Tricycles provided with an attachment handle whilst being used under the control of the parent, shall be constructed in such a way as to prevent entrapment of the child's feet in the pedals etc while being either pushed or pulled (e.g. free-wheels mechanism of foot rests.)		
Status:		
Forward to BSI:	Interpretation Methods	Amendment No Further Action
Agreed to forward to CW15 for consideration as amendment to the Standard to include items being pulled.		
TG 1 is of the opinion that this is not an interpretation request and has requested more information on the possible hazard to be sent to WG 3 to consider an amendment.		
7.10.09 Reference doc N500 087-06 (BSI) request from TG1 for BSI to submit detailed proposal for amendment to WG 3		
Feb 10 : Livelink N500 – BSI has been offered to submit a detailed proposal for amendment to WG3.		
		/continued over

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19.7.2010 This issue may have been driven by complaints and may be an amendment rather than interpretation. RS / MS to check for any complaints / injury data.

28.10.2011 The additional hazard of a toy being pulled was considered by TG1 but was not added to EN71-1: 2011. As accident data is limited and there is no technical solution, the issued should be closed. This was agreed by all. **(#021 to be closed.)**

CEN/TC 52/TG 1 N 81 Rev2

10/21

TG members

Comments:

Dominique Jan 08: I cannot disagree with this. Should we propose to amend the standard to replace “while being pushed” by “while being pushed or pulled”?

Clive Jan 09: Perhaps “whilst being pushed or pulled as appropriate” would be the best text.

Sanda Jan 13 I would be interested to know if there is an identified hazard related to this question.

Knowing the background may be needed to make a sensible amendment. If it is only a “theoretical” question we may decide not to amend the standard in order to limit the number of amendments.

Malcolm Jan 13, Is it possible that we can make an interpretation that being pulled is technically the same as being pushed? If not then an amendment would be needed.

Rolf Jan. 14 I think Malcolm is right. One important toy-vehicle manufacturer told me that pulled or pushed has to be technically the same, the pedals should have been moved by the child only in all directions and not by turning the wheels (no rigid drive).

Sanda, the manufacturer told me that the most accidents in the past arose by pulling backwards by adults.

Karina-Jan 15 : We have checked in the EU market there are some vehicles which are constructed to

prevent entrapment of the feet only while being pushed. It would be necessary to know the accidents data

before proposing and amendment.

Natale-Jan 21: It is not possible to amend this requirement without a deep discussion. EN 71-1 reads

“Tricycles provided with an attached handle used for pushing the child, shall be constructed in such a way

as to prevent entrapment of the child’s feet in the pedals etc. while being pushed (e.g. free-wheeling

mechanism or foot rests).”

Thus EN 71-1 says that an acceptable solution to meet the requirement is to have a free-wheeling

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mechanism. A free-wheeling mechanism is a mechanism which is widely used (all adults bicycles have it)

and which allows to transfer the motion from the pedals to the wheels if riding forward, and not to transfer

any motion between the pedals and the wheels (and vice versa) if riding backward.

On a bicycle or tricycle with such a feature, if the child rotates the pedals forward, the bicycle moves, if it

rotates the pedals backward, the bicycle does not move.

This also means that if the tricycle is pushed forward, if the child keeps its feet still the pedals do not rotate.

But if the tricycle is pulled backward, the pedals rotate.

Thus, if we change the requirement, EN 71-1 shall be deeply changed and what is now suggested by the

standard itself (free-wheeling mechanism) will become banned. And a huge amount of products currently

on the market having the free-wheeling feature, will be considered as dangerous.

Helen Jan 23

I agree that this needs further discussion in WG3. To me it is on the border line to call it an interpretation of the standard.

Christian Jan 23. I don't think anybody is suggesting that we make an interpretation – all seem to be in

favour of an amendment. I agree fully with Natale and think that an amendment would perhaps be a requirement for a warning on the handle intended for use on tricycles with free-wheeling mechanism, e.g

“Risk for feet entrapment: Do not use the handle to pull the tricycle backwards”

Dominique April 2009: to be further discussed during the next meeting in Milan.

Milan 09: TG 1 is of the opinion that this request is not a request for interpretation and recommends BSI to substantiate this request by providing more information on a possible hazard.

This information should then be directly sent out to WG 3 for consideration if an amendment is considered necessary.