

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.	116
Date of publication	December 2016
Standard/Directive	EN 71-2 2011+A1 2014
Clause No	4.2.4
Clause Title	Full or partial moulded head masks

Question

Clause 4.2.4 applies to full or partial moulded head masks of which seems to apply to the example below.



The top of the mask is a moulded plastic and the bottom portion (around the mouth area) is a textile material.

The test method of 5.3 simply tells the user to apply the flame at point 20-30mm from the bottom of the toy. This could include the plastic or the fabric parts.

The standard tells us the following:

When a product incorporates several features, for example a hat with an attached mask and hair, each part shall be tested separately to the applicable clause relevant to that particular part of the toy.

Given this should the product be:

1. Addressed by 4.2.4 alone and the flame be applied to any component of the mask, or,
2. Addressed by 4.2.4 and 4.2.5 with the moulded portion being covered by 4.2.4 and the fabric portion being covered by 4.2.5?

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Interpretations Group Answer /Action

Option 2 is considered to be the correct interpretation.

The definition of a moulded head mask only covers parts that are moulded to the head or face. The fabric part does not meet this definition. The standard also tells us that different features of the product may be addressed using different clauses relevant for that part.

Given this clause 4.2.4 should apply to the plastic part and clause 4.2.5 should apply to the fabric part (although it is noted there is unlikely to be enough fabric for this clause to apply).

This is supported by several of the examples in 3.1 of TR 15371-1.

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

CEN Actions