



# **BUSINESS PLAN**

**CEN/TC 252**

**TITLE: CHILD CARE ARTICLES**

**2021 version**

## **EXECUTIVE SUMMARY**

### **Scope**

Standardisation of horizontal requirements of any product designed or obviously intended to safely ensure and facilitate seating, bathing, changing and general body care, feeding, sleeping, transportation and protection for young children. Standardisation of all products related to child care for which no other Technical Committee exists. The main focus is for products intended for children up to 4 years old.

### **Business Environment**

- The parties involved are:
  - Manufacturers; retailers and importers;
  - Testing houses;
  - Public authorities (including some Consumers Agencies);
  - Consumer organisations.
- "Directive 2001/95/EC of the European Parliament and of the Council of 3 December 2001 on general product safety" regulates consumer product safety, in a horizontal way, at EU level. This directive, adopted in December 2001, is applicable since January 2004. Several European standards on child use and care articles have been listed in the OJEU as presumption of conformity with the GPSD.

### **Benefits**

- Since 1990, 29 European standards were adopted; 17 draft European standards are still under preparation.
- Increase of the safety of all the European citizens, and especially for babies and very young children (from 0 to 48 months old).
- Removal of technical barriers to trade and opening of markets throughout European market.
- Recognition in other countries than the European market.

## Priorities

- Prepare high quality standards to be referenced in the OJEU in the framework of the General Product Safety Directive.
- Ensure that the standards are applied in similar ways from one laboratory to another by developing reliable and repeatable and available interpretations on the adopted CEN/TC 252 standards in order to clarify any point so that it become unambiguous point.
- Ensure that the standards are aligned with European mandates and standardization requests.

## 1 BUSINESS ENVIRONMENT OF THE CEN/TC 252

### 1.1 Description of the Business Environment

The following factors describes the business environment of the industry sector, products, materials, disciplines or practices related to the scope of this CEN/TC.

These factors may significantly influence how the relevant standards development processes are conducted and the content of the resulting standards.

- *Economic factors:*

The preparation of European standards (EN) aims to reduce the costs resulting from the diversity of national provisions, which create an obligation for specific productions for different markets.

- *Social factors:*

The reduction of the risks, which can result from using child care articles, is of particular importance, because these products are used with young children, or intended for the latter.

These children are considered as a very vulnerable group within society, which requires a high level of protection, identical in all the CEN member countries.

- *Legal factors:*

Child care articles do not currently form the subject of a specific Community regulation. They therefore fall within the scope of the Council Directive 2001/95/EC of the European Parliament and of the Council of 3 December 2001 on general product safety.

This directive regulates consumer product safety, in a horizontal way, at EU level. A product shall be presumed safe (as far as risks and risks categories covered by relevant national standards are concerned) when it conforms to voluntary national standards transposing European standards, the references of which have been published by the Commission in the Official Journal of the European Union.

The lists of EN standards in the framework of the GPSD are regularly published.

Some EU countries have national regulations (e.g. France, Germany, United Kingdom, etc.). These national regulations can cover all child care articles, as does for example the French regulation, or only some of them, as does for example the British regulation.

In 1998, CEN received a mandate M/264 (consumer safety: child care) from the EC. This surely indicated recognition by the EC of a strong need of common safety requirements in this field.

A major revision of mandate M/264 is in progress and is likely to impact on the framework within which TC 252 operates during the period covered by this business plan.

This mandate is likely to replace the following current documents:

- Mandate M/497 (sleeping environment),
- Mandate M/052 (materials in contact with food),
- Mandate M/253 (consumer safety: baby walkers),
- Mandate M/527 (children's seats),
- Mandate M/464 (drowning risk).

Assessment of draft standards by a HAS contractor and consultants might impact on the work programme. In addition, a new Annex ZA, demonstrating the Relationship between the European Standard and the safety requirements of Directive 2001/95/EC, will add to the workload of the technical committee and WGs.

## 1.2 Quantitative Indicators of the Business Environment

The following list of quantitative indicators describes the business environment in order to provide adequate information to support actions of the CEN /TC 252.

Child care articles are diversified consumer products, for which there does not exist at Community level any production or trade statistics. Indeed, only a few EU member States have trade organisations specific to these said articles (Austria, Belgium, France, Germany, Italy, the Netherlands, Spain, United Kingdom) and the latter are not identified in the customs statistics (except prams and pushchairs and their accessories).

However, certain characteristics of the child care article market can be singled out:

- *Offer:*

The producers are SMBs ( $\leq 500$  employees), save two or three major companies ( $> 500$  employees).

However, extra-Community trade is important and in deficit. Indeed, the EU imports more of these articles than it does exports. These imports stem principally from Southeast Asia.

The study of ENPC shows that this market amounted to 2.8 billion Euros in 2011. The figure corresponds to wheeled equipment, car seats and feeding equipment. Per country this represents 768 million Euros in France, 707 million Euros in the UK, 539 million Euros in Germany, 444 million Euros in Italy and 351 million Euros in Spain. The market is currently rather decreasing, due to a sharp drop in birthrates and decrease of purchasing power. The only product category which appears to show some form of growth is babies and children's car seats<sup>1</sup>.

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<sup>1</sup> Car seat products are not included in the scope of the CEN/TC 252 but are part of the business environment of child care articles.

- *Demand:*

The demand for child care articles depends firstly on the birth rate. The latter has been stagnating, even decreasing for several years in the European Union. The EU counted 5,148 million babies born in the EU (Eurostat, 2016), and the total fertility rate in Central and Eastern Europe reaches 1.8 (The Lancet, 2017).

Other parameters, such as income, home space, new consumer behaviours (travelling with children, sharing the child between divorced parents and with grandparents), e-trade, and second-hand market, can change the demand.

Life-style changes by young parents generate a preference for the portability of childcare products, such as in France where 77% say that it is so much easier when you can carry all necessary products with you, when you move around. They find that the three most useful products for travelling with a baby are: a rigid car seat 93%, strollers 92%, and a baby changing bag 87% (FJP). Besides that, there is also often the factor of limited resources, when a government decides to reduce financial family support (France) or when the parents are divorcing, which leads them to buy or receive much cheaper second-hand nursery products, which are so easy to find and buy online.

## **2 BENEFITS EXPECTED FROM THE WORK OF THE CEN/TC 252**

CEN/TC 252 started its activity in 1990, following a request from the Industry. The prime aims were to harmonise existing requirements and to facilitate trade within Europe.

At the beginning, the standardisation work concerned the main articles such as wheeled child conveyances. Then, the field of standardisation was enlarged and many other articles were studied, such as:

- safety barriers,
- baby carriers,
- feeding and drinking equipment (including nitrosamine consideration and other chemicals),
- soothers (including soother holders),
- child seats for cycles,
- reclined cradles,
- carry cots and stands,
- bathing aids and seats,
- reins and harnesses,
- chair mounted seats,
- table mounted chairs,
- baby walking frames,
- baby bouncers,
- infant swings,
- general guidelines.

The whole standardisation work was not performed for the benefit of one industry but with a view to increase the safety of all the European citizens, and especially that of very young children (from 0 to 48 months old). There are indeed more than 20 million of young children in Europe, forming an important and vulnerable part of the society.

### **3 PARTICIPATION IN THE CEN/TC 252**

All the CEN national members are entitled to nominate delegates to CEN Technical Committees and experts to Working Groups, ensuring a balance of all interested parties. Participation as observers of recognized European or international organizations is also possible under certain conditions. To participate in the activities of this CEN/TC, please contact the national standards organization in your country.

### **4 OBJECTIVES OF THE CEN/TC 252 AND STRATEGIES FOR THEIR ACHIEVEMENT**

#### **4.1 Defined objectives of the CEN/TC 252**

The objectives of CEN/TC 252 are:

- to set up products' safety standards;
- to reduce the risks which can result from using child care articles using a hazard based approach;
- to provide consumers with appropriate information by harmonising the specifications relating to the marking of the articles, purchase information and instructions for use;
- to reduce the technical barriers to trade, thanks to the harmonisation of the technical requirements.

#### **4.2 Identified strategies to achieve the CEN/TC 252's defined objectives.**

At its creation in 1990, CEN/TC 252 decided to draw up safety standards for child care articles, by grouping the latter into product families defined according to the functions to be fulfilled.

These standards define safety requirements established according to the risks to be covered (obligation of results and not of means). For example, in order to cover the risk of finger entrapment, requirements are defined for the gaps and openings, on the basis of anthropometric data and risk assessment.

In order to check that these requirements are fulfilled, the standards define test methods, inspired as far as possible from those already used in other sectors (e.g. toys, furniture).

A CEN Report (CEN/TR 13387), based on new hazards approach, was drawn up in order to avoid restrictive design issues and to specify:

- horizontal safety requirements related to child care articles, excluding furniture ;
- common methods of measurement and test applicable to the products within the scope of CEN/TC 252.

The work is based on:

- existing data in legislation, rules, standards, guidelines or other commonly accepted documents ;
- hazard analysis.
- The CEN/TC 252 structure reflects the function approach. The Committee counts six “vertical” working groups, specialised in each function, which define a product family:
  - WG 1 "Seating and body care",
  - WG 2 "Sleeping, relaxation and lying down function",
  - WG 3 "Wheeled transportation",
  - WG 4 "Early learning and protection",
  - WG 5 "Feeding, drinking, sucking and similar functions",
  - WG 7 "Child seats for cycles".

Furthermore, a “horizontal” working group (WG 6) is in charge of defining safety principles and test methods common to the different articles, including anthropometric data from a study by another group, purchase information and instructions for use, in order to assist the “vertical” groups.

- CEN/TC 252 has set up joint working group with Technical Committee on textiles to work on Mandate M/497:
  - CEN/TC 248/JWG 34 “Joint Working Group between CEN/TC 248 and CEN/TC 252 - Risks in the sleeping environment”,
- CEN/TC 252 has set up liaisons with other European Technical Committees working on products for children:
  - CEN/TC 52 “Safety of toys”,
  - CEN/TC 136/SC 1 “Playground equipment for children”,
  - CEN/TC 207/WG 2 “Requirements for children’s and nursery furniture”,
  - CEN/TC 333 “Cycles”,
  - CEN/TC 33/WG 3 "Blinds and shutters",
  - CEN/TC 364 "High chairs",
  - CEN/TC 398 "Child Protective Products",
  - ISO/TC 136/WG 6 "Children's and nursery furniture",
  - ISO/PC 310 "Wheeled child conveyance".

ANEC, Partner Organisation of CEN, participates in the work of CEN TC 252 on behalf of European consumers. In addition, liaisons have been set up with manufacturers associations (Toys Industries of Europe (TIE)), European Children’s Fashion Association (ECFA), European Nursery Products Confederation (ENPC), Baby Carrier Industry Alliance (BCIA), World association of Manufacturers of Bottles and teats (WBT)) and with the European Commission (EC).

- CEN/TC 252 is run via a CEN livelink, thus enabling all members to have all the working documents available at one glance and to speed up the information transfer.
- CEN/TC 252 has set up a scheme for interpretation of the standards adopted on child care articles, in order to ensure, as far as possible, that EN standards are used in similar ways, from one laboratory to another and to reduce discrepancies in their application.

#### **4.3 Environmental aspects**

The need to reduce the potential impacts on the environment of a product that can occur during all stages of its life is recognized around the world.

The potential environmental impacts of products can be reduced by taking into account environmental issues in Product standards.

- CEN/TC 252 intends to consider environmental issues when drafting product standards in support of sustainable international trade.
- Furthermore, CEN/TC 252 undertakes to use CEN/GUIDE 4 to determine if it is possible to deal with an environmental issue through a product standard.

#### **5 FACTORS AFFECTING COMPLETION AND IMPLEMENTATION OF THE CEN/TC 252 WORK PROGRAMME**

The factors which influence the proper execution of the work programme are described hereunder:

- the absence of scientific information or data regarding certain very specific points ;
- the lack of validation by interlaboratory trials of the new test methods, through lack of financial resources ;
- the lack of statistical data on accidents which have occurred when using child care articles, and in particular the absence of information concerning the circumstances of these accidents. Now, only the latter would make it possible to draw objective lessons from the accidents ;
- due to different cultures and traditions within Europe sometimes long and time-consuming discussions regarding responsibilities of parents/carers and foreseeable use slows down the completion and implementation of the CEN/TC 252 work program. ;
- the child care articles field is a very sensitive one. Lifestyles are more and more European and household appliances become similar through Europe. However behaviour and education in the first months of life are still influenced by what the parents got when they were nursed. In some countries like France, most of the children are at school before the age of 3 whereas in other countries, children go to school at about 6 years old. People need time to change their mind;
- within certain working groups, the lack of professional standardization support to the Secretary;

- the work load for the experts is very important as most of them are part of several working groups (“fewer hands for more involvement”). As with many companies for which manufacture requires significant manpower, even the production of bulky products has moved towards the Far East. Experts from these companies are very busy and active in the follow up of remote production. Experts working in small and medium enterprises, as well as laboratories, whose activities are still in Europe, have to fight for their survival. They encounter more and more difficulties to participate actively to the standardisation work;
- the number of experts attending to the different meeting is decreasing and, by consequence, the knowledge and the “memory” of the groups is being lost;
- CEN/TC 252 active participating countries deeply regret the lack of participation and knowledge of market surveillance authorities which are active within the RAPEX-system. CEN/TC 252 believe that these authorities could have very valuable knowledge and input in the development of standards; during the last decade, a lot of changes occurred in this industry.
- the problem of the status of standards not referenced in OJEU, which creates differences in treatment by the administrations of the Member States and therefore these standards are not used in the same way in some countries.



## 6 CEN/TC 252: PROGRAMME OF WORK

Drafting body	WI number	Reference	Title	Status	Next step
CEN/TC 252/WG 1	00252117	prEN 12790-1 rev	Child care articles - Reclined cradles - Part 1: Reclined cradles for children up to when they try to sit up	Active	Formal vote
CEN/TC 252/WG 1	00252118	prEN 12790-2 rev	Child care articles - Reclined cradles - Part 2: Reclined cradles for children up to when they start to walk	Active	Formal vote
CEN/TC 252/WG 1	00252126	prEN 1273rev	Child care articles - Baby walking frames - Safety requirements and test methods	Not registered	Activation
CEN/TC 252/WG 2	00252110	prEN 1466	Child care articles - Carry cots and stands - Safety requirements and test methods	Active	Formal vote
CEN/TC 252/WG 3	00252128	EN 1888-1/prA1	Child care articles - Wheeled child conveyances - Part 1: Pushchairs and prams	Active	CEN enquiry from 2021-03-18 to 2021-06-10
CEN/TC 252/WG 3	00252135	EN 1888-2/prA1	Child care articles - Wheeled child conveyances - Part 2: Pushchairs for children above 15 kg up to 22 kg	Active	
CEN/TC 252/WG 3	00252131	EN 1888-3	Child care articles - Wheeled child conveyances - Part 3: Pushchairs intended for sport activities	Active	
CEN/TC 252/WG 3	00252136		Child care articles - Tricycles - Safety requirements and test methods	Active	
CEN/TC 252/WG 4	00252071	EN 13209-1	Child care articles - Baby carriers - Safety requirements and test methods - Part 1: Framed back carrier	Publication	
CEN/TC 252/WG 4	00252104	prEN 13209-3	Child care articles - Baby carriers - Safety requirements and test methods - Part 3: children's slings and other soft carriers	Waiting	Proposal of WI for approval
CEN/TC 252/WG 4	00252119	prEN 1930 rev	Child care articles - Safety barriers - Safety requirements and test methods	Withdrawn	out of delay/ need to create à NWI
CEN/TC 252/WG 5	00252130	prEN 12586 rev	Child care articles - Soother holder - Safety requirements and test methods	Active	CEN enquiry

<b>Drafting body</b>	<b>WI number</b>	<b>Reference</b>	<b>Title</b>	<b>Status</b>	<b>Next step</b>
CEN/TC 252/WG 6	00252xxx	CEN/TR 13387-5	Child care articles - General safety guidelines - Part 5: Product information	Active	
CEN/TC 252/WG 6	00252xxx	CEN/TR 13387-3	Child care articles - General safety guidelines - Part 3: Mechanical hazards	Active	
CEN/TC 252/WG 6	00252113		Child care articles – Chemical hazards – requirements and test methods	WI not accepted	Proposal of WI for approval
CEN/TC 252/WG 7	00252093	prEN 14344 rev	Child care articles - Child seats for cycles - Safety requirements and test methods	Active	Formal vote
CEN/TC 252	00252106	prCEN/TR 16411 rev	Child care articles - compiled interpretations of CEN/TC 252 standards	Active	

## 7 CEN/TC 252: PUBLICATION ROAD MAP 2021-2023

# CEN/TC 252 Publication Road Map 2021 – 2023 and later

Not registered (idea)

Waiting (Preliminary)

2021

2022

2023 or later

WG 1



FprEN 12790-1&2 rev



EN 1273/ prA1



EN 12072/ prA1



Rev of EN 12221



Rev of EN 16232

WG 2



FprEN 1466



Soft carry cots & Carry cots with 2 handles

WG 3



Amd to EN 1888-1:2018



Amd to EN 1888-2:2018



CEN/ TR tricycles



prEN 1888-3



CEN/TR 16411:2021



prCEN/TR 16411 rev



prCEN/TR 16411 rev

# CEN/TC 252 Publication Road Map 2021 – 2023 and later

Not registered (Idea)

Waiting (Preliminary)

2021

2022

2023 or later

WG 4



FprEN 13209-1



prEN 1930 rev



prEN 13209-2 rev



prEN 13209-3 rev

WG 5



prEN 12586 rev



prEN 14372 rev

WG 6



PWI : 00252113

WG 7



FprEN 14344 rev