EXECUTIVE SUMMARY

Scope
Standardization of 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. Standardization of all products related to child use and care for which no other Technical Committee exists.

Comments: child care articles are intended to be used with children up to four years.

Business Environment
- The parties involved are:
  - Manufacturers; retailers and importers;
  - Testing houses;
  - Public authorities (including some Consumers Agencies);
  - Consumers.
- “Directive 2001/95/EC of the European Parliament and of the Council of 3 December 2001 on general product safety regulate 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 OJEC as presumption of conformity with the GPSD.

Benefits
- Since 1990, 28 European standards were adopted; 10 draft European standards are still under preparation.
- Increase of the safety of all the European citizens, and especially that of very young children (from 0 to 48 months old).
- Removal of technical barriers to trade and opening of markets throughout Europe.
Priorities

- Prepare high quality standards that can 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 understandable and available interpretations on the adopted CEN/TC 252 standards in order to clarify any point so that it become unambiguous point.

1 BUSINESS ENVIRONMENT OF THE CEN/TC 252

1.1 Description of the Business Environment

The following political, economic, technical, regulatory, legal, societal and/or international dynamics describe the business environment of the industry sector, products, materials, disciplines or practices related to the scope of this CEN/TC, and they may significantly influence how the relevant standards development processes are conducted and the content of the resulting standards:

- **Economical factors:**
  the preparation of European standards (EN) enable to reduce the costs currently generated by the diversity of the national provisions, which set an obligation for specific productions for such and such market.

- **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 latters.

  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:**

  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, Netherlands, Spain, Sweden, United Kingdom etc.). These national regulations can apply to child care articles as a whole, as do for example the French regulation, or only to some of them, as do for example the British regulation. As for Germany, the national regulation corresponds to 2001/95/EC.

In 1998, CEN received a mandate (M/264) from the EC. This surely indicated recognition by the EC of a strong need of common safety requirements in this field. However, it should be pointed out that this mandate caused some problems regarding the speed of the publication of the standards covered by this mandate.

- **Product bans:**
  - baby walking frames, by Canada (April 2004);
  - request from ANEC to ban bath seats (April 2004).

However, these products are widely sold on the market; many consumers found them of good help in their nursing activities and it seems important to define safety requirements as well as clear instructions for use for these products.

### 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 (France, Germany, Italy, 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 (≤ 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.

- **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 counts approximately 5 million of births per year (5.4 millions in 2008 – source INED) and the population age group 0 – 4 yo is projected on 1 January 2010 to 23,438 million (Eurostat – Population statistics – 2006 Edition).

  Other parameters such as income, homespace, new habits (travelling with children, share of the child between divorced parents, with grandparents) can change the demand.
2 BENEFITS EXPECTED FROM THE WORK OF THE CEN/TC 252

CEN/TC 252 has 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),
- cycle carriers,
- child seats for cycles,
- reclined cradles,
- changing units as well as
- 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 at least more than 20 000 000 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 reduce the risks which can result from using child care articles, thanks to the drawing up of safety standards;
- to offer the consumers the necessary information, thanks to the harmonisation, via standards of the specifications relating to the marking of the articles, to the 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) was drawn up in order to specify:
- horizontal safety requirements related to child care and use articles;
- 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 6 "General and common safety specifications",
  - WG 7 "Child carriers for cycles".
Furthermore, a "horizontal" working group (WG 6) is in charge of defining safety principles and test methods common to the different articles, as well as anthropometric data and markings, 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”.

In addition, liaisons have been set up with European consumers (ANEC, ECOSA) or manufacturers associations (Toys Industries of Europe (TIE), European Children’s Fashion Association (ECFA)) and with the European Commission (EC).

- CEN/TC 252 is runned via a CEN livelink, thus enabling all members to have all the working documents available at one glance and enabling to speed up the information transfer.

- CEN/TC 252 has set up a scheme for interpretation of the standards adopted on child use and 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 the discrepancies of 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.
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/cares 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”);
- the number of experts attending to the different meeting is decreasing and, by consequence, the knowledge and the “memory” of the groups;
- 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 whose authorizes could have very valuable knowledge and input in the development of standards; during the last decade, a lot of changes occurred in this industry. As for other industry requesting a lot of manpower, even production of bulky products 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.