



Mr. R. Chantry-Price  
Secretary to CEN/TC 252 WG4

ANEC2002/0553/TVA

Brussels, 29 November 2002

### **Issues for next CEN/TC 252 WG 4 meeting - 9th and 10th of December**

Dear Mr. Chantry-Price,

Our ANEC representative on CEN/TC 252 WG4, Anne Smith, was unable to attend the meeting of CEN/TC 252/WG4 that was held in Stockholm on 17th and 18th of October 2002. Additionally, she will not be able to attend the next meeting to be held on the 9th and 10th of December.

There are three issues that ANEC considers should be discussed at the forthcoming meeting:

On reading the minutes of the Stockholm meeting, there are two issues related to prEN 13209-2 - Soft carriers that ANEC would like to draw to the attention of the Working Group, details are attached in Annex 1 and Annex 2 to this letter.

Additionally, ANEC would like to draw the attention of the Working Group to the accident that was reported to them earlier this year, details are attached in Annex 3 to this letter.

We would be grateful if these three issues could be discussed at the forthcoming meeting.

Yours sincerely,

Tania Vandenberghe  
Programme Manager

cc. Mrs. A. Smith, ANEC representative CEN/TC 252 WG4

## Annex 1

### **prEN 13209-2 – Soft carriers**

In your minutes of the meeting of CEN/TC 252/WG4 held in Stockholm on 17<sup>th</sup> and 18<sup>th</sup> October 2002, a decision was taken to delete Clause 6.5 – Head Support from the draft.

I appreciate the difficulty Working Group 4 faced when the French Laboratory did not produce a test method for this clause. However, by deleting the clause, you have made it possible for a soft carrier to be produced which can comply with the standard but does not have a support for the head of a baby from birth. This is clearly unacceptable as a carrier could be designed according to the standard that was little more than a shopping bag with holes in the bottom for the legs of the child.

My suggestion is that you re-instate Clause 6.5 giving a requirement for a soft carrier that is used from birth to have a head support for the child. In the foreword you could indicate that when a test becomes available the standard would be amended to include a test that would ensure its effectiveness.

I appreciate that this is a subjective requirement and would leave a test house to decide whether the carrier was fitted with a head support or not. However, this situation is preferable to a standard which would allow a carrier to comply with the standard but would not provide the necessary support for the head of a very young child.

I trust you will be able to discuss this at your next meeting of CEN/TC 252/WG4

Anne Smith – ANEC representative on CEN/TC 252/WG4

## Annex 2

### **prEN 13209: 2 – Soft carriers**

In your minutes of the meeting of CEN/TC 252/WG4 held in Stockholm on 17<sup>th</sup> and 18<sup>th</sup> October 2002 you state that the bite test as defined in Clause 6.6 will be deleted from the draft. If I had been able to attend this meeting, I would together with Mr Hale and Mrs Rainer, disagreed with this decision.

The rationale for deleting the bite test included a statement that the movement of a child's head in a soft carrier is very limited (rationale point 2). However, if the soft carrier is designed for older children then this is unlikely to apply. Additionally, if the child is transported on the carer's back, then the child could be biting into the product without the carer being aware that this is happening.

As currently drafted, soft carriers can be used for children over the age of 6 months, the age at which they start biting into products.

prEN 13209: 1- Framed back carriers has a requirement for a bite test. If the hazard is being addressed in a framed carrier, then it should be addressed in a soft carrier.

I would find it acceptable to exclude the requirement for a bite test for soft carriers that are designed for children up to the age of 6 months. This would enable manufacturers to use soft fabrics (rationale point 4) for the very young child.

I trust you will be able to discuss this at your next meeting of CEN/TC 252/WG4

Anne Smith – ANEC representative on CEN/TC 252/WG4

### **Annex 3**

#### **Accident relating to Child Carrier**

At a previous meeting of CEN/TC 252/WG4 an accident which occurred in the Netherlands was reported to the members of the WG.

Apparently the carrier was attached to the care's torso by one strap only. The fastening clip became unfastened in use.

I believe that CSI sent a sample of the product to Laboratoires Pourquery for testing to see whether the sample would pass or fail during the dynamic test.

Has Working Group 4 received the results from this test?

Query? Should there be a requirement that a minimum of two shoulder straps should be required to attach the carrier to the carer's torso?

Anne Smith – ANEC representative on CEN/TC 252/WG4