

Document Control	
Document:	G1
Date:	2 December 2013
Version:	2.5
Do you have the latest version? Check the MIS website.	

Guidance on the mandatory child safety requirements for internal blinds

1.0 INTRODUCTION

This document has been prepared to help BBSA members and Make it Safe dealers to understand the requirements of the revised EN 13120 and the two test method standards. The BBSA strongly recommends that you read the standards fully to ensure their production, selling and installation processes are fully compliant.

1.1 Definitions

EN 13120 has a range of definitions detailed on pages 7-9 but to avoid any confusion when reading this guide two specific definitions are highlighted here:

- “cord(s)” are used throughout the standards to mean cord(s), chain(s), ball-chain(s), tape(s) and similar
- A “curtain” is part of the product which is set in motion by the operating mechanism and ensures its function, so in effect it is the moving part of the blind and not a curtain as in a drapery product

1.2 Implementation

The requirements of the standard are not retrospective. (“This standard is not applicable to internal blinds which are manufactured before the date of publication of this standard”) So ensuring product is date stamped/coded will be important.

1.3 Key

Any text on the succeeding pages shown in speech marks is a verbatim quote from the standards.

1.4 Derivation of the Standards

The EU Decision of 28th July 2011 mandated CEN to incorporate the requirements of the Decision into EN 13120. In interpreting the requirements into this product standard, wholesale changes were made to the standard in particular clauses 8 and 15 plus an additional clause 16.1. Note that the standards were only changed to reflect the new requirements of child safety so other clauses are unaffected.

This work also required the writing of test method standards, one for testing the safety devices within the product (EN 16433) and an additional test method (EN 16434) to deal with the requirements of retrofit in particular and the aspects affecting the supply chain for safety devices.

The child safety elements of EN 13120 will be mandated under the General Product Safety Regulations (GPSR). These regulations define a safe product and are a legal requirement on all businesses. If you comply with EN 13120 then there will be a “presumption of conformity” to the GPSR. See document L1 for more information.

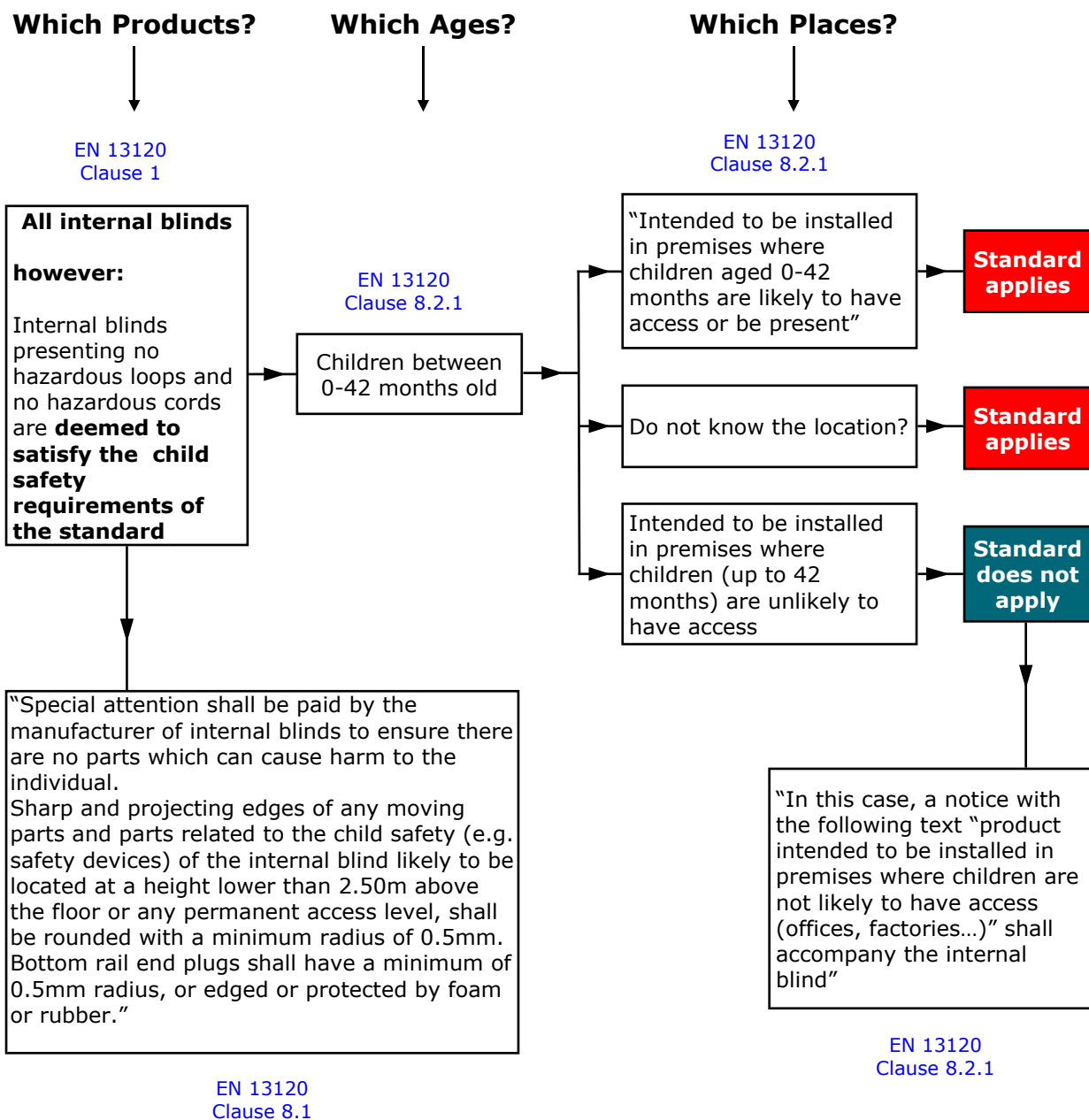
The information in this document is only intended to give general and preliminary guidance to the reader on the General Product Safety Regulations.

The information should not form the basis upon which the reader makes any decisions or conclusions concerning their own rights or their obligations under the General Product Safety Regulations. The BBSA strongly recommend that the reader obtains detailed and specific legal advice from their own legal counsel concerning their position.

No warranty of any kind, whether express or implied, is given by the BBSA in respect of the information or as to the fitness and suitability of the information for any purpose whatsoever. The BBSA cannot guarantee that the standards or regulations will not be changed before coming into force, or after having come into force will be subject to change, or how the regulations will be interpreted. The BBSA are not responsible for any errors, omissions, or statements made.

The BBSA are not responsible for any loss, howsoever caused, and whether arising directly or indirectly from reliance upon the information and any recommendations provided by the BBSA to any member of the BBSA or any reader of this material.

2.0 OVERVIEW



Key Interpretation Points

Blinds which are “safe by design” (no operating cords or chains and no hazardous inner cords) comply with the requirements. Basically every other internal blind needs to meet the child safety standards of EN 13120 if used where children between 0-42 months are likely to have access or be present

If you do not know where the blinds are going to be installed you have to assume they will be used where young children will be present and so have to be compliant

Publicly accessible buildings will require full compliance (or at least the areas in those buildings that are publicly accessible)

Homes will require full compliance irrespective if children are present or not

Commercial buildings unlikely to require full compliance but need notice to say products are not suitable for locations where children may be present - this can be detailed in the product instructions or other paperwork. Advisable to put label in headrail etc to same effect

3.0 OPERATING METHODS

Installation Height	Cord Length	Test	
3.1 Operating loop - Breakaway System - (EN 13120 - 8.2.3.2.2)			
Known	Distance from floor to bottom of pull cords shall be at least 0.6m	"In either instance the hazardous loop shall be eliminated when a mass of 6 kg is applied to the pull cord(s) gradually or within 5 s of application"	
Not Known	Less than or equal to 2/3 drop of blind		
3.2 Operating loop - Fixed Tensioning System (EN 13120 - 8.2.3.2.3)			
Known	Distance from floor to bottom of pull cords shall be at least 1.5m	"The distance between the two strands of the loop shall not be more than 50mm at the point of exit from the fixed tensioning device. In addition, no part of the fixed tensioning system shall crack or fracture under the application of a load of 60 N to the pull cord(s). The fixed tensioning system shall continue to function as intended."	
Not Known Drop ≤ 2.5m	Length of pull cords shall be less than or equal to 1m		
Not Known Drop > 2.5m	Shall be less than or equal to drop of blind less 1.5m		
Installation Height	Cord Length	Test	Accumulation Device
3.3 Pull Cord(s) (EN 13120 - 8.2.3.3)			
Known	Distance from floor to bottom of pull cords shall be at least 1.5m	2 Pull cords: "Pull cords shall not tangle, or if they tangle the hazardous loop shall be eliminated under the application of a mass of 6 kg within 5 seconds of application OR Pull cords shall be connected together using a breakaway system. The hazardous loop shall then be eliminated under the application of a mass of 6 kg or within 5 s of application." More than 2 Pull cords: Pull cords connected to breakaway system which eliminates hazardous loop under 6 kg within 5 seconds More than 4 Pull cords: In absence of a suitable breakaway connector it is accepted that the cords may be connected to a single pull cord on condition that the connector is positioned at less than 50 mm from the headrail when the internal blind is in fully extended position	Unless at all positions of the blind the cords are as described in the cord length column of this table (which is highly unlikely) "An accumulation system shall be supplied so that pull cords can be stored out of reach of children. The accumulation system shall be designed so that: 1. The complete length of pull cord(s) can be accumulated and maintained when the internal blind is in the fully retracted position 2. No more than 100mm of cord(s) is released after a force of 60 N is applied to any of the cord(s) on either side of the accumulation device, the curtain being in the fully retracted position."
Not Known Drop ≤ 2.5m	Length of pull cords shall be less than of equal to 1m		
Not Known Drop > 2.5m	Shall be less than or equal to the drop of blind less 1.5m		

Key Interpretation Points

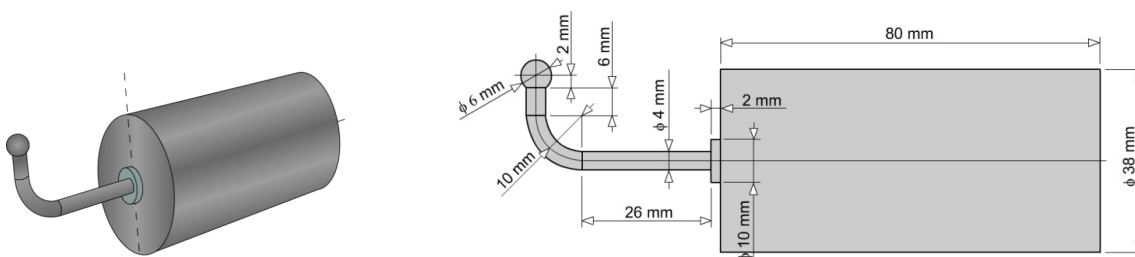
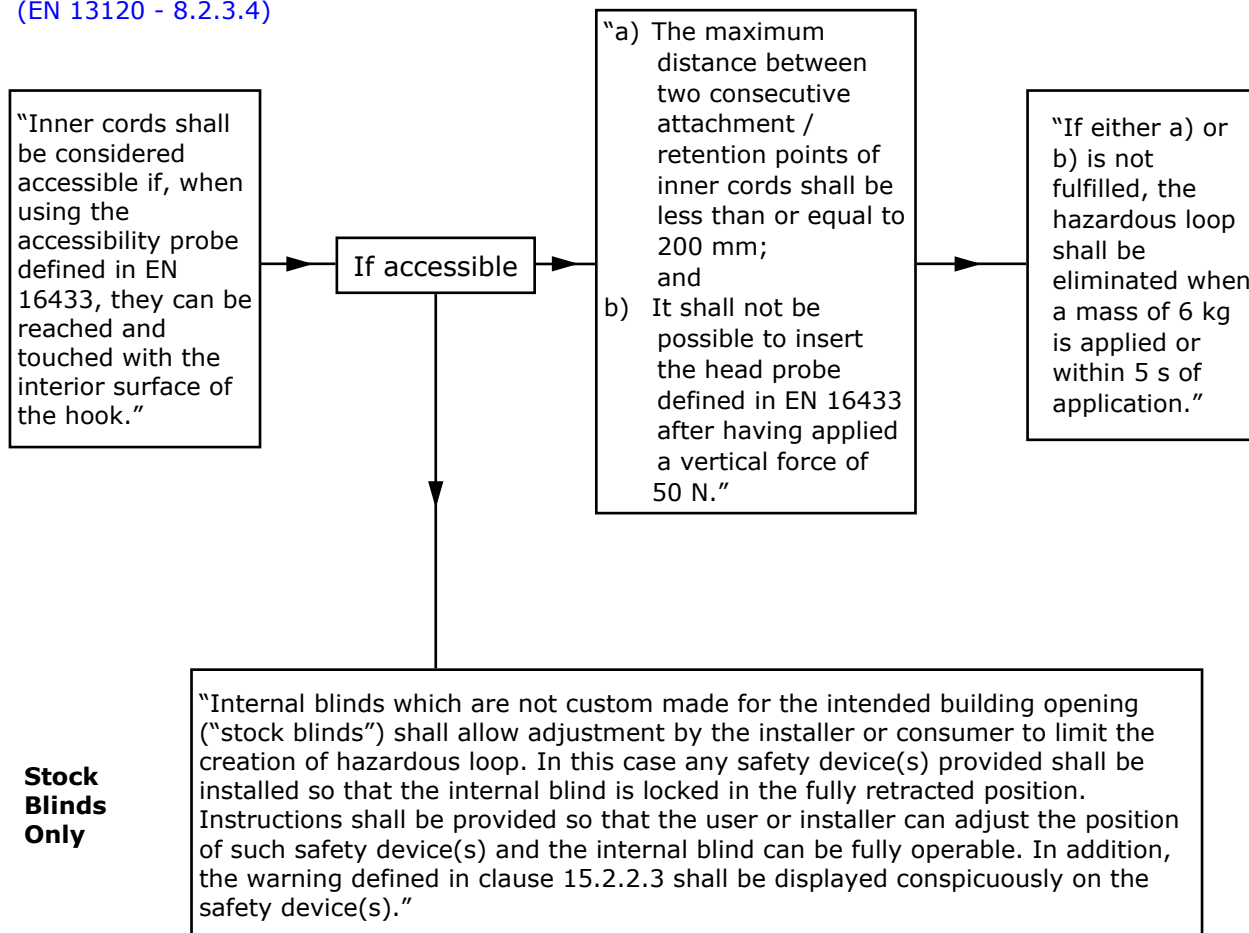
Highly likely that an accumulation device, such as a cleat, will be required when pull cords are used

Cleat must be able to hold all of the cord when the blind is fully retracted

Blinds with pull cord(s) cannot be fitted at a height of less than 1.5m from the floor. See [8.2.3.3](#)

4.0 INTERNAL BLINDS WITH ACCESSIBLE INNER CORDS

(EN 13120 - 8.2.3.4)



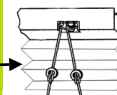
Accessibility probe as defined in EN 16433

Key Interpretation Points

Affects many blind styles such as Venetian and Pleated as well as rear cords on Roman blinds

One way to prevent an inner cord loop from forming is to fix cord stops to each pull cord "as close to the headrail as possible and not more than 50mm away, the blind being in the fully extended position"

Note: on Roman blinds if the panel is under 200mm then a breakaway device is not necessarily required

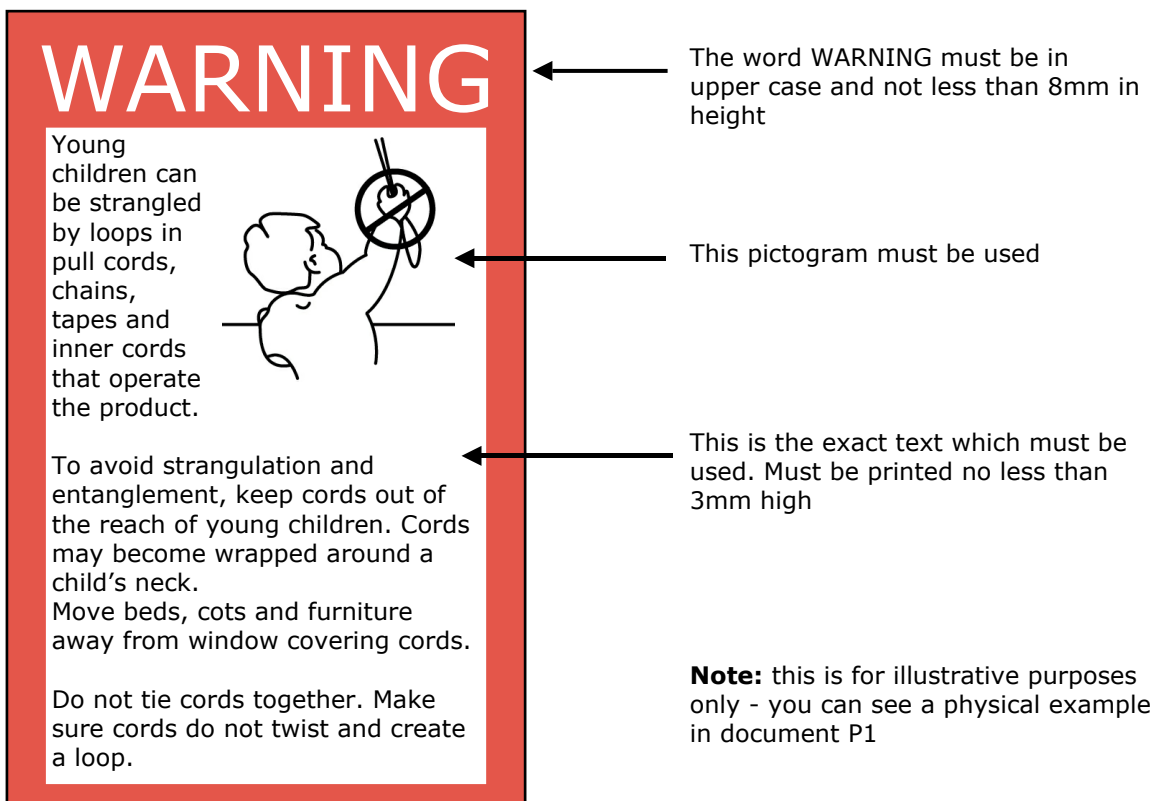


5.0 WARNINGS, INSTRUCTIONS & MARKINGS (EN 13120 - 15.2.2)

5.1 General Warning (EN 13120 - 15.2.2.2)

5.1.1 Mandatory Requirements - On Product

Warning notice must be attached to the product and in a conspicuous position.



WARNING

Young children can be strangled by loops in pull cords, chains, tapes and inner cords that operate the product.

To avoid strangulation and entanglement, keep cords out of the reach of young children. Cords may become wrapped around a child's neck. Move beds, cots and furniture away from window covering cords. Do not tie cords together. Make sure cords do not twist and create a loop.

The word WARNING must be in upper case and not less than 8mm in height

This pictogram must be used

This is the exact text which must be used. Must be printed no less than 3mm high

Note: this is for illustrative purposes only - you can see a physical example in document P1

5.1.2 Mandatory Requirements - On Packaging and Instructions

"The text on the warning notice shall be repeated in the instruction for use and on the packaging directed to the user. The warning to be applied on the packaging may not fulfil the requirements on the dimensions of the text specified in 15.2.2.1 but shall still be clearly legible."

Key Interpretation Points
Three mandatory requirements are detailed above - colours, shape etc is discretionary
You can add additional safety wording after the mandated wording if you wish
The BBSA can provide compliant swing tickets to members along with a label with the mandatory warning for packaging "aimed at the consumer" See document P1
The BBSA can provide members with the artwork of the pictogram in jpeg and eps formats
"Packaging directed to the consumer" is interpreted by the BBSA as POS packaging not transit cartons for mail order etc.

5.2 Specific Warning Notices (EN 13120 - 15.2.2.3)

5.2.1 Mandatory Requirements for non-integral devices as determined in clause 8.2.3.1

"Safety systems which are non-integral to internal blinds (e.g. fixed tensioning system, accumulation system) shall be delivered attached to the cord(s) [of the product] for which it is intended and in the position of intended use. In addition, the warning defined in clause 15.2.2.3 shall be conspicuously displayed on the safety system."

Children can strangle if this safety device is not installed. Always use this device to keep cords or chains out of reach of children.

This is the exact text which must be used. Text must be 3mm in height

5.2.2 Mandatory Requirements for accessible inner cords as determined in clause 8.2.3.4

Children can strangle if this safety device is not installed and adjusted. Read carefully the instructions and install accordingly.

This is the exact text which must be used. Text must be 3mm in height. This is for **stock blinds only**

Key Interpretation Points

Mandatory requirements are detailed above - colours, shape etc is discretionary

Can add additional safety wording after the mandated wording

Note the requirement for the warning notice to be applied to the device in its position of intended use - so a cleat, for example, would have to have the cord wrapped around in a figure of 8 and the appropriate warning notice applied to this

The accessible cord warning notice is only for stock blinds (not made-to-measure)

5.3 General Instructions (EN 13120 - 15.3.2.1)

"If safety devices are provided (see clause 8.2), accurate instructions shall be included to ensure their proper installation. For fixed tensioning systems, instructions shall specify that the fixed retaining device shall be installed at the maximum distance possible from the control mechanism to prevent the looped pull cord(s) becoming slack.

In the case of internal blinds with pull cord(s) as referred to in clause 8.2.3.3, the installation instructions shall state that:

- headrails shall not be installed less than 1.5m from the floor, and
- the accumulation system shall be installed as close to the headrail as possible and, in all cases, not less than 1.5m from the floor."

5.4 Point of sale information (EN 13120 - 15.3.4)

"Information suitable for display at the point of sale regarding protection from strangulation shall be provided. This information shall contain at least the warning notice defined in 15.2.2. The supplier shall recommend that this information be displayed by the retailer at the point of sale.

NOTE: The manufacturers of the blinds are responsible for supplying point of sale information highlighting the child safety features of the products to those companies offering the product for sale to the consumer. Once it has been achieved it is the retailers' responsibility to ensure such items are available for the consumer at the point of sale."

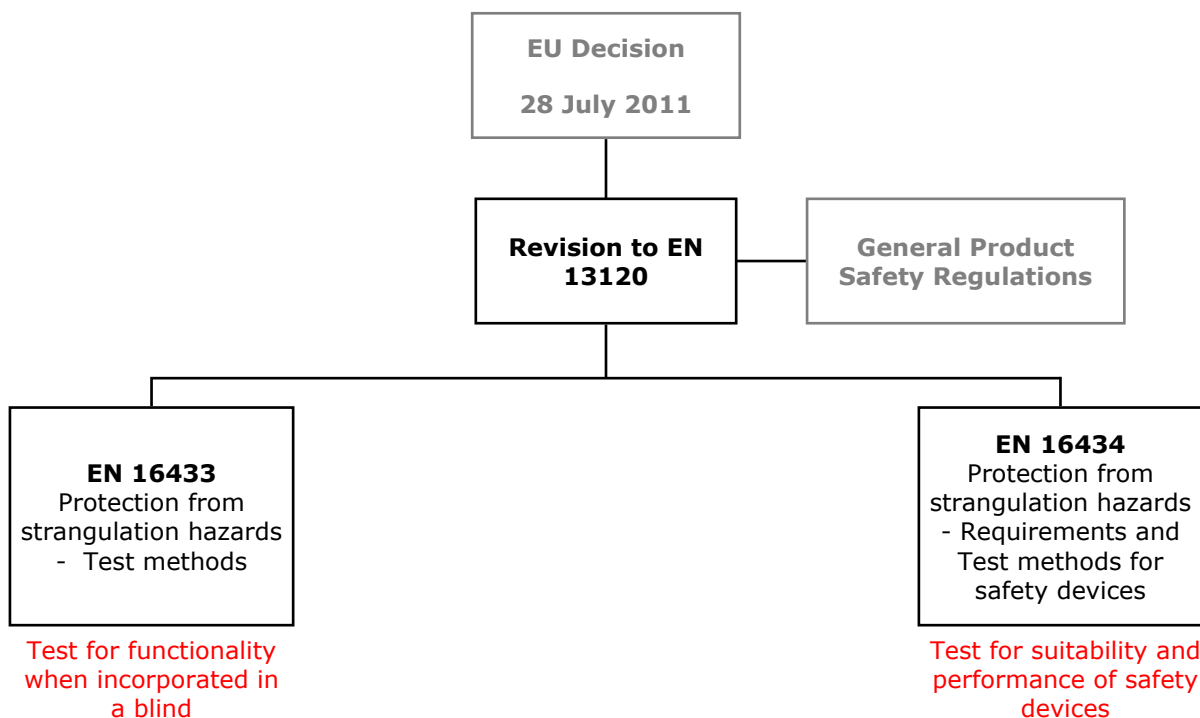
5.5 Marking (EN 13120 - 16.1)

"The name or trademark of the manufacturer or importer or distributor shall be displayed on the internal blind."

NB - This is all to do with traceability. "Distributor" is a very wide term and intended to cover those in the distribution chain such as retailers and professional installers. The BBSA believes "displayed **on** the product" could be interpreted as "displayed **in** the product" - so a label in the headrail or on the roller tube should meet the requirements.

Key Interpretation Points
Instructions need to be carefully considered
Professional installers must leave instructions with customer after fitting the blind(s)
Manufacturers are responsible for providing point of sale information for retailers
Retailers are responsible for displaying child safety information
Products need to be marked with manufacturer name/trademark etc.

6.0 TEST METHOD STANDARDS



Tests for:

- Breakaway systems (Clause 6)
 - Operating system consisting of free hanging cord(s) connected together (6.2.1)
 - Inner cord(s) forming a hazardous loop (6.2.3)
- Tensioning system (7)
- Accumulation system (8)
- Tangling test (9)
- Inner cords test (10)

Tests for:

- Artificial aging (Clause 5)
 - Exposure to UV (5.1)
 - Mechanical endurance (5.2)
 - Effect of temperature (5.3)
- Tensioning device (6)
- Breakaway device (7)
- Accumulation device (8)
- Non-tangling device (9)
- Inner cord stop (10)
- Additional requirements (11)
 - Release of small components (11.1)
 - Impact resistance (11.2)
- Information requirements (12.2)
- Instructions for retrofitting (12.3)

Key Interpretation Points

Compliance is proved by testing
All tests can be completed by self-testing although it is advisable to get any test equipment checked and calibrated as a minimum
Sample size is determined by the standards
Need to document test results and store appropriately
Whoever puts the product on the market is responsible for ensuring the product is compliant

6.1 Test Method Requirements

6.1.1 EN 16433 Protection from strangulation hazards - Test methods

Key Interpretation Points
This is a test for functionality within a blind
Test sample shall be representative
Test records must be kept
Testing can be carried out by self-testing
See Annex A in the standard for a good summary on the flowchart of testing
"Although at the time this standard has been published, no standard exists for draperies, test methods specified in the present standard may be used for this product"

6.1.2 EN 16434 Protection from strangulation hazards - Requirements and Test methods for safety devices

Key Interpretation Points
This is a test to prove the suitability of a safety device
6 kg and 5 second test is standard to test the efficacy of systems
Test sample shall be representative but sample sizes are detailed by ISO standard
Test records must be kept
Testing can be carried out by self-testing

6.1.3 EN 16434 Instructions & Information

"The following information shall be given:

- the name or trademark of the manufacturer or importer,
- the type of internal blind for which the safety device is designed and tested,
- information on the use, purpose and possible limitations of the safety device,
- a warning that the release of small parts could result in the internal asphyxiation of the child.

In addition, the following specific information shall be given depending on the safety device concerned:

- tensioning device: the suitability of the device for either a single cord loop, a single ball-chain loop, dual or any other combination,
- breakaway device: the limits, if any, of the cord or ball-chain properties and characteristics (e.g. diameter) to be used in conjunction with a connector and the limits, if any, of the fabric properties and characteristics (e.g. thickness) which may affect the efficiency of the device,
- accumulation device: the length of cord that can be accumulated by the device depending on the cord properties,
- non tangling device: the limits, if any, of the cord properties and characteristics to be used in conjunction with the device,
- inner cord stops: the limits, if any, of the cord properties and characteristics (e.g. diameter) to be used in conjunction with the device."