

To Whom it May Concern,

On October 3, 2018, under the authority of the *Canada Consumer Product Safety Act* (CCPSA), Health Canada published new *Playpens Regulations* in the *Canada Gazette*, Part II (<http://gazette.gc.ca/rp-pr/p2/2018/2018-10-03/html/sor-dors186-eng.html>).

The new *Playpens Regulations* (SOR/ 2018-0186) repeal and replace the *Playpens Regulations* (SOR 2016-0189). The objective of the new *Playpens Regulations* is to help increase playpen safety by aligning the majority of the Canadian requirements with the American mandatory rules, and aligning some others with the *Cribs, Cradles and Bassinets Regulations* (CCBR).

The new *Playpens Regulations* (the Regulations, hereafter) will come into force on April 3, 2019. On that date, products manufactured, sold, advertised or imported in Canada must comply with the new Regulations. Playpens that were manufactured prior to April 3, 2019 and are compliant with the old regulatory requirements may continue to be sold in Canada but only up to the coming into force date of April 3, 2019.

The bullets below outline some of the changes to the construction and performance requirements that have been introduced in the new Regulations. Full details of the new requirements are available in the regulatory impact analysis statement, which can be accessed using the *Canada Gazette* link that was provided above.

- Specifies requirements for openings which can pose an entrapment hazard by including a performance requirement and test method—aligned with that of the CCBR—to assess and limit the size of openings in playpens and sleep accessories;
- Includes a 30 mm limit for between floor pad and playpen's side or between the mattress pad and sleep accessory's sides;
- Includes a maximum angle of 7 degrees for the incline of the sleep surface. Please also see below for the angles of products that rock or swing;
- Includes bilingual warning statements relating to issues such as: blind and curtain cord proximity to playpens to reduce the risk of strangulation; the assembly and use of playpens and accessories, including the age and abilities range of children for whom the products are designed; supervision while a child is in the playpen; and keeping the playpen free of soft bedding to reduce the risk of suffocation;
- Stability test requires that the playpen must have at least three perimeter support points that remain in contact with the test plane. Additionally, one of the support points must not be in a straight line with the other two and must be of a sufficient distance from one another;
- Includes requirements relating to playpens' top rail latching and locking mechanisms by requiring that any latching or locking mechanism must engage automatically and have either a single-action mechanism that requires the application of a specified force to unlatch or unlock it, or a dual-action mechanism that requires separate deliberate and simultaneous actions to unlatch or unlock it;
- Includes requirements to prevent playpen sides from breaking or folding when subjected to static weights;
- Includes requirements that no top rail must give the appearance of being in the manufacturer's recommended use position unless the locking device is fully engaged;
- Includes a test to eliminate playpen designs incorporating a hinge or latch that is capable of creating a "V" or diamond shape when folded;

- Includes a test assessing whether corner brackets can withstand a single significant twisting action applied at a specific location near the midpoint of the top rails;
- Includes a requirement that a playpen must not have any projection, fastener, or mechanism that can entangle an occupant's clothing or other object worn by the occupant;
- Includes a requirement to limit the height of corner posts to 1.5 mm above the lowest point on the upper surface of the higher of the sides that adjoin the post. The measurement is taken from within 76 mm from the outermost surface of the post;
- Includes a maximum thickness of 38 mm for floor pads;
- Increases minimum side height of a playpen from 480 mm to 508 mm (measured from the top of the playing surface to the top of the upper surface of the lowest side) to safeguard against falls out of playpens;
- Includes requirements intended to prevent the possibility of children's fingers being caught in open holes in the product by specifying that if a hole admits a 5.33 mm diameter probe, it must also admit a 9.53 mm diameter probe;
- Includes a test which involves applying an upwards force to the floor pad to limit the amount of upwards displacement of the floor pad;
- Includes an improved static load test, requiring the application of two simultaneous forces, as well as a dynamic load test;
- Changes to the specifications for the mesh probe. Therefore, Canadian requirements will use the probe currently considered as an industry standard, which helps to safeguard against entrapment of fingers or toes in holes in the product. Furthermore, the test specified in the Regulations does not involve cutting a sample of mesh from the product;
- Includes a test which involves applying a force to a textile side to determine if it can become detached from the frame;
- Includes requirements relating to entrapment, strangulation, and warnings concerning the correct use of accessories;
- Removes the restriction on the number of playpen wheels or casters;
- Includes a side height requirement of 191 mm, (measured from the top of the mattress pad to the top of the upper surface of the lowest side, with no compression on the mattress pad) for sleep accessories to reduce the risk of the child falling out;
- Limits the thickness of mattress pads of sleep accessories to 38 mm;
- Requires a sleep accessory to withstand a static load of 24 kg, placed in succession in the centre of the sleep accessory and at all of its corners. The load approximates three times the weight of an infant that would be placed in the sleep accessory;
- Requires change table accessories withstand a static load of 45 kg applied to the centre of the surface that supports the child;
- Includes a maximum rock or swing angle and a maximum angle at rest, which are at 20 degrees and 7 degrees respectively;
- Allows the use of a pouch to store the assembly and use instructions, as long as it is accompanied by the relevant warnings.

It is your responsibility to ensure that all products that your firm manufactures, imports, advertises or sells in Canada meet all the applicable Canadian legislation.

If you have questions, please contact your Health Canada Regional Product Safety Office at 1 866 662 0666. Calls will be routed to the nearest Regional Product Safety Office. The regional offices can also be reached via email at hc.cps-spc.sc@canada.ca.