

The Regulation prohibits the use of azo dyes that release one of the 22 aromatic amines. The prohibition applies to all textiles and that may come into direct and prolonged contact with the human skin or oral cavity. Examples of such products are

- clothing, bedding, towels, hairpieces, wigs, hats, nappies and other sanitary items
- sleeping bags
- footwear, gloves, wristwatch straps, handbags, purses/wallets, briefcases, chair covers
- purses worn around the neck
- textile or leather toys and toys which include textile or leather garments and
- yarn and fabrics intended for use by the final consumer.

Please note that this list is not exhaustive.

The threshold limit for the prohibited amines, allowed to be found in the article or in the dyed parts thereof is 30 ppm for each amine. This is the limit of detection, so basically the use of dyes releasing the dangerous amines is prohibited.

If you export to the EU, it is important to check that all parts of your product comply with the limit and that each present amine complies with the limit by itself. For example, a bow on a plush toy needs to comply with the limit of 30 ppm, as well as body of the toy. It is not allowed to take the average concentration of a certain amine in the complete product.

Eurofins services

With annual sales of US\$ 900 million and 8,000 employees across 150 sites in 30 countries, Eurofins is a leading international group of laboratories providing an unparalleled range of testing and support services to the pharmaceutical, food, environmental and consumer products industries and to governments.

Through our worldwide network of laboratories and experts we offer a variety of services to ensure you meet the challenges to ensure that your toy is compliant with international legislation. Eurofins is pleased to offer legal and regulatory advice, testing, and implementation programs for compliance to the new directive, enabling you to meet your business objectives with the minimum of fuss.

Compliance testing

Eurofins offers the necessary tests for all the mentioned legislation, and also a number of tests for additional national legislation.

These tests may require determination of hazardous ingredients, articles or materials that are in contact with food, migration from the material into human skin (sweat and skin fat), or saliva - or emission into surrounding air. Selection of appropriate migration simulants is decisive for a reliable test.

Within the European Toys Directive, Eurofins is operates two notified bodies for CE marking. Eurofins is in addition an approved testing lab for testing and issuing the Blue Angel ecolabel for wooden toys.

To meet the market demands for toy testing in Asia, Eurofins group have invested and established new laboratories in Shanghai and Shenzhen aimed at providing professional and efficient testing and certification services.

Consulting

Eurofins follows development of legislation on toys closely and are directly involved in international trade and standards committees. This enables us to support our clients with qualified guidance regarding legislation and how to comply, with assistance for defining specifications to suppliers, and much more.

Contacts

Eurofins Product Testing A/S

Galten, Denmark
Phone +45 70 224276
ProductTesting-GA@eurofins.com

Eurofins Consumer Product Testing GmbH

Hamburg, Germany
Phone +49 40 570104 100
ProductTesting-HH@eurofins.com

Eurofins Product Testing Services Ltd.

Manchester, United Kingdom
Phone +44 161 8687600
ProductTesting-MA@eurofins.com

Eurofins Modulo Uno S.p.A.

Torino, Italy
Phone +39 348 8054909
ProductTesting-TO@eurofins.com

Eurofins Scientific (USA), Inc.

Des Moines, Iowa, USA
Phone +1 858 568 7175
ProductTesting-US@eurofins.com

Eurofins Testing Technology (Shenzhen) Co. Ltd.

Shenzhen, China
Phone +86 755 8358 5700
ProductTesting-SZ@eurofins.com



Toys Safety

When you need confidence and a service you can trust

Safety and performance are fundamental concerns for consumers, particularly for parents, who buy toys and other products related to children.

Toy safety is a prominent issue globally with many countries establishing their own safety regulations such as in the European Union and its member states, the EU Toy Directive, CPSIA in the United States of America, Hazardous Products (Toys) Regulations in Canada, the International Standards Organisation in Australasia, Asia, Africa and the Middle East and the Mercosur Resolution 23/04 in Latin America.

An overview of the legislation that retailers, wholesalers, importers and manufacturers of toys you need to be aware of is given in this document.

Eurofins provides solutions for toy and juvenile products that includes specialised services, advice and consultancy and comprehensive testing. Our services ensure that your products and supply chain meet the required governmental and international regulations and industry standards. So let us care for your business with our worldwide network of laboratories.

European Toys Safety Directive (2009/48/EC)

The European Toys Safety Directive intends to guarantee that any toys (including their packaging) placed on the market will not have any negative impact on the safety and health of the users i.e. children less than 14 years of age. The Toy Directive (2009/48/EC) has been published in the Official Journal in June 2009, and is effective from July 2011 onwards with the European Toy Directive 88/378/EEC being repealed. The new chemical requirements will be effective from July 2013 onwards.

Revisions to the Directive include

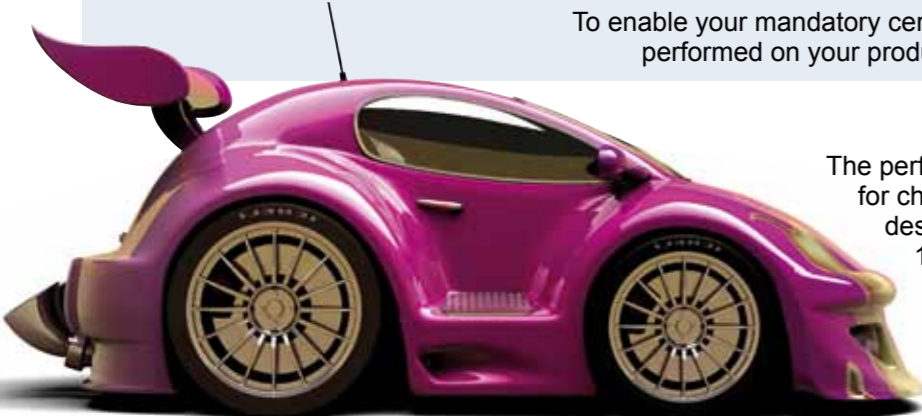
- new migration limits for 19 restricted elements
- toys shall comply with the EU REACH regulation
- ban on substances classified as CMR (carcinogenic, mutagenic or toxic for reproduction)
- 55 allergenic fragrances may not be used in toys, only technically unavoidable traces are allowed up to 100ppm
- cosmetic toys shall comply with Directive 76/768/EEC
- 11 allergenic fragrances in Annex II of 76/768/EEC shall be listed on toys at concentration exceeding 0.01% by weight
- toys contained in food must have their own packaging
- toys that are firmly attached to food are prohibited
- new provisions on sound-emitting toys
- new rules on warnings and labelling.
- nitrosamines and nitrosable substances banned in toys for children under 36 months or mouth-contact toys and
- a toy intended for use by children under 36 months must be designed and manufactured in such a way that it can be cleaned.

With our worldwide network of laboratories and experts we offer a variety of services to ensure you meet the challenges to ensure that your toy complies with the new directive. We are pleased to offer legal and regulatory advice, testing, and implementation programs for compliance to the new directive, enabling you to meet your business objectives.

Consumer Product Safety Improvement Act (CPSIA) Testing
 The Consumer Product Safety Improvement Act of 2008 (CPSIA) is a federal law that

- sets revised limits on lead and phthalates in children's products
- sets mandatory toy standards
- sets third party testing requirements by CPSC accredited laboratories
- sets standards for durable nursery products
- strengthens the enforcement authority of the Consumer Product Safety Commission (CPSC) to recall and provide notices and
- greatly increases potential penalties and fines. It broadens the scope of the CPSC's enforcement and gives the state attorneys general authority to enforce the legislation.

To enable your mandatory certification you must have 3rd party testing performed on your products by a CPSC accredited lab.



The performance requirements for products intended for children 12 years of age and younger are described in the American Standards 16 CFR1500, 16 CFR 1501, 16 CFR 1510, 16 CFR 1511 and ASTM F963 -07e1.

Generally, products do not meet the requirements of the CPSC's regulations if any of the following occur:

Where toys that are intended for children 3 years and under contain

- small parts
- parts with accessible sharp points
- accessible sharp edges (glass and metal parts only)
- accessible components with a lead content above 300 ppm

or fail

- to meet the pacifier or rattle requirements (where applicable).

Where toys that are intended for children over 3 years but not more than 96 months have

- accessible sharp edges (glass and metal parts only)
- hazardous projections and
- accessible components with a lead content above 300 ppm.

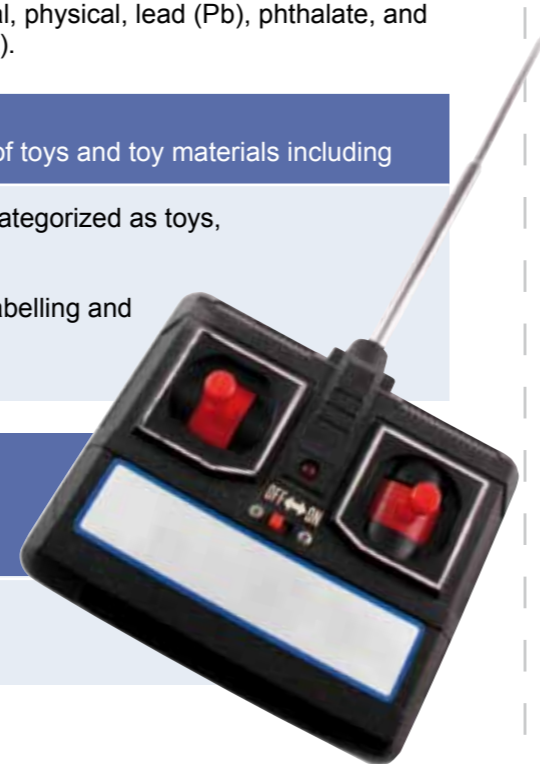
Where toys that are intended for Children who are 12 years and younger have

- accessible components with a lead content above 300 ppm.
- to meet the pacifier or rattle requirements (where applicable).

Eurofins provides essential support services to show compliance with mechanical, physical, lead (Pb), phthalate, and all other requirements of the Consumer Product Safety Improvement Act (CPSIA).

ISO 8124
 The requirements in ISO 8124 apply to the following toys and toy components of toys and toy materials including

- intended food and oral contact toys, cosmetic toys and writing instruments categorized as toys, irrespective of any age grading or recommended age labelling
- all toys intended for or suitable for children up to 72 months of age
- accessible coatings, irrespective of any age grading or recommended age labelling and
- accessible liquids, pastes, gels (e.g. liquid paints, modelling compounds) irrespective of any age grading or recommended age labelling.



In an ongoing effort to toughen toy safety, ISO technical committee ISO/TC 181 safety of toys, has updated and improved (in 2009 and 2007 respectively) the first two parts in ISO's toy safety series:

- Part 1:** Safety aspects related to mechanical and physical properties
- Part 2:** Flammability

These have further been added to in 2010 with two Toy Safety Standards intended to reduce the risk of injury to children from unsafe equipment and dangerous substances that may be present in toys.

- Part 3:** Migration of certain elements
- Part 4:** Swings, slides and similar activity toys for indoor and outdoor family domestic use

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The ISO 8124 series is expected to expand in the near future with the addition of three parts. These include

- total concentration of certain elements in toy material
- determination of phthalate plasticizers in plasticized material and

Eurofins has the technical expertise and experience to offer you a comprehensive range of services to assist you smoothly through the ISO safety testing process.



Additional Compliance Tests

REACH and carcinogenic, mutagenic or toxic for reproduction (CMR) substances

In order to protect children against recently discovered risks, the requirements on chemical substances in toys is being considerably strengthened. In particular toys must comply with REACH legislation and restrictions are in place that prohibits the inclusion of substances that are classified as a CMR. Safety and risk assessments according to the relevant Toy Safety Regulations and REACH are required before a toy can be placed on the market.

RoHS Directive on electrical and electronic devices

All elements of electrical and electronic devices must not exceed limit values for some metals and for two brominated flame retardants (RoHS Directive 2002/95/EC). This applies also to toys with electric or electronic equipment. For more details of declaration and testing - please see our special 'RoHS' flyer.

The Packaging Waste Directive

All packaging – including packaging for toys – is regulated by European Directive 94/62/EC. The Toy Safety Directive 2009/48/EC does not contain a definition of packaging, however annex II.1.4.(e), (f) and (g) state clear safety requirements on packaging of Toys.

European EMC Directive 2004/108/EC

Electromagnetic Compatibility (EMC) is the ability of systems, equipment and devices to utilize the electromagnetic spectrum to operate in their intended operational environments without suffering unacceptable degradation or causing unintentional degradation through electromagnetic radiation or response.

Regulations for wireless products

To avoid interference of wireless products there are regulations established in the worldwide markets. There is a distinction between compliance with international regulations (e.g. ETSI, FCC, IC etc.) and compliance with independent program requirements (e.g. Bluetooth, WLAN etc.)...

Electrical safety

Electric toys and other electrically operated products intended for use by children can be extremely hazardous if improperly used, used without supervision, or not properly designed and/or constructed. The possible dangers are many: electric shock and burns, especially if the product has a heating element; and a wide variety of mechanical hazards common to toys in general, such as sharp edges and points and dangerous moving parts.

Azo dyes

Azo dyes, extensively used for colouring a variety of consumer goods, such as leather, clothes, food, and toys, can under certain conditions be reduced to form confirmed or suspected carcinogenic aromatic amines. The prohibition on the use of certain azo dyes is laid down in Annex XVII to the EU Regulation (EC) 1907/2006 on the registration, evaluation and authorization of chemicals (REACH), which is directly applicable in all EU Member States.

