

REACH GUIDANCE FOR TOYS

Toys manufactured, imported or sold within the EU are subject to complex chemical testing requirements. Consumer protection is paramount. As a manufacturer, importer or retailer it is your responsibility to make sure that the goods in your supply chain are compliant.



REACH – the European Union regulation concerning the Registration, Evaluation, Authorization and Restriction of Chemicals. It places responsibility on industry to manage the risks that chemicals may pose to public health and to the environment. It applies to all chemicals - not only those used in industrial processes but also those found in products which we use in our daily lives, including toys.

Setting up a REACH compliance programme will help guide you through the process.

UNDERSTAND HOW REACH APPLIES TO TOYS

Toys can be classified as:

- Substance on its own e.g. chemistry sets
- Substance in a mixture e.g. slime, toy cosmetics, bubble solutions and inks in felt-tip pens

- Substance in an article e.g. teddy bears, toy bags, wooden blocks, bath toy sets, ride-on toys, inflatable toys and toy houses

It is essential to understand how REACH impacts your products. To achieve compliance you must first know the chemical composition of a toy and the quantities of each substance present. This will enable you to:

- Restrict the use of dangerous substances (REACH Annex XVII)
- Reduce the use of SVHC (Substances of Very High Concern)
- Communicate SVHC information through the supply chain

WHEN THE QUANTITY OF A SVHC ON THE CANDIDATE LIST IS > 0.1% IN THE ARTICLE

If requested, EU companies are required to provide information on SVHC in

their articles to consumers within 45 days (free of charge). To obtain this information you should first check data from your suppliers. If the chemical composition data is not available you can obtain this information by conducting SVHC testing.

For each SVHC identified in a quantity greater than 0.1% you can also prepare a technical data sheet for your communications with consumers. This should include:

- Identification of the manufacturer/importer
- Identification of the substance (e.g. name, trade name)
- Manufacture and use of substance
- Classification and labelling
- Exposure and safe use information

WHEN THE QUANTITY OF A SVHC ON THE CANDIDATE LIST IS > 0.1% AND > 1 TONNE PER YEAR

EU companies must notify a SVHC present on the Candidate List when the following conditions are met:

- The SVHC constitutes > 0.1% in the article AND
- The total quantity of the SVHC in the articles is > 1 tonne per year per manufacturer or importer

IMPORTANT: Notification is not required if the SVHC has already been registered for that use, or the risk of exposure to humans and the environment can be excluded.

In the event that you need to notify the SVHC you need to prepare an SVHC Notification Dossier. This should include:

- Identification of the producer/importer
- Registration number(s) if available
- Substance identification
- Substance classification

- A description of the substance's use in the article
- Tonnage range of the substance (e.g. 1-10 tonnes)

You should also arrange an assessment of the effect of exposure of each substance on human health and the environment.

IS SVHC AUTHORISATION REQUIRED?

EU producers who manufacture products containing an SVHC on the Authorisation List (REACH Annex XIV) must apply for the usage. Articles imported into the EU are not affected. Products containing SVHC on the Authorisation List can be placed on the market or used after the 'Sunset Date' only if authorisation has been granted for a specific use OR if the use is under exemption.

IMPORTANT: if authorisation is granted you must:

- Update the Safety Data Sheets (SDSs)
- Include the authorisation number on labels before placing substance or a mixture containing the substance on the market

SVHC testing can identify the presence and quantity of SVHC in your product. You should devise a substitution plan to identify safer alternatives to SVHC and check whether you can use substances that are non hazardous/more environmentally friendly while providing similar functions.

ASSESS COMPLIANCE WITH REACH ANNEX XVII (RESTRICTED SUBSTANCES)

Restricted substances testing can check REACH's Annex XVII requirements for toys and perform relevant tests for restricted substances. These may include:

- Phthalates
- Azo dyes
- Cadmium content and many more

ACHIEVE ONGOING COMPLIANCE

Whether you are a manufacturer, importer or retailer, it is essential to have a strategy in place that allows you to feel confident in achieving REACH SVHC compliance. SGS offers a comprehensive suite of services to help customers comply with their obligations under REACH, from initial REACH registration to consulting, testing, auditing and verification services to support ongoing compliance.

For further information, please contact reach@sgs.com or your local SGS sales representative.

The substances in toys also come under the scope of the EU Toy Directive. To know more about new chemical requirements that will apply from 21st July 2013, see our article "[EU Toy Directive Counts Down to Chemicals Compliance](#)" p.14.

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