



# International safety standards reference guide for toys & premiums

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## Comparison of abuse test conditions for international toy safety requirements

TEST	AGE (MONTHS)	USA	EUROPE
		CPSC 16 CFR PART 1500/ ASTM F963	EN 71 PART 1
Drop test	0 to 18	4.5 ft. (1.37 m), 10 drops for all toys weighing less than 3 lb (1.4 kg)	0.85 m (2.8 ft.), 5 drops for all toys weighing less than 4.5 kg (10 lb)
	> 18 to 36	3 ft. (0.91 m), 4 drops for all toys weighing less than 4 lb (1.8 kg)	
	> 36 to 96	3 ft. (0.91 m), 4 drops for all toys weighing less than 10 lb (4.5 kg)	-
Impact test	0 to 36	For toys containing magnets: 1 kg mass from 100 mm	1 kg mass from 100 mm
Tip-over test	0 to 96	3 times*	3 times* up to 3 years
Torque test	0 to 18	2 in.-lb (0.23 N-m)	0.34 N-m (3 in.-lb)
	> 18 to 36	3 in.-lb (0.34 N-m)	
	> 36 to 96	4 in.-lb (0.45 N-m)	-
Tension test	0 to 18	10 lb (44.5 N)	<ul style="list-style-type: none"> <li>Tension test for EN 71 part 1 – Dimension ≤ 6 mm, 50 N (11.2 lb); Dimension &gt; 6 mm, 90 N (20.2 lb)</li> <li>Tension test for EN 71 part 1 – 60 N (13.5lb) for protective tip and foam shaft suction cups</li> <li>Tension test for EN 71 part 1 – 50 N (11.2 lb) or 90 N (20.2 lb) for suction cups on projectiles (excluded foam shaft suction cups)</li> <li>25 N (5.6 lb) for component made entirely of paperboard</li> </ul>
	> 18 to 36	15 lb (66.8 N)	
	> 36 to 96	15 lb (66.8 N)	
Compression test	0 to 18	20 lb (89 N)	110 N (24.7 lb)
	> 18 to 36	25 lb (111.3 N)	
	> 36 to 96	30 lb (133.5 N)	-
Flexure test	0 to 18	Bend 30 cycles of 120° at a rate of 1 cycle/2 sec., rest 60 sec. every 10 cycles, 10 lb (44.5 N) bending force	120° at a rate of 1 cycle/2 sec., rest 60 sec. every 10 cycles, 70 N (15.7 lb) bending force <ul style="list-style-type: none"> <li>For wires designed and intended to be bent: bend 30 cycles</li> <li>For wires not designed and intended to be bent but likely to occasionally or accidentally be bent: bend 1 cycle</li> </ul>
	> 18 to 96	Bend 30 cycles of 120° at a rate of 1 cycle/2 sec., rest 60 sec. every 10 cycles, 15 lb (67 N) bending force	

\* For large and bulk toys

CANADA	AUSTRALIA	JAPAN
CANADA CONSUMER PRODUCT SAFETY ACT TOYS REGULATIONS (SOR/2011-17)	AS/NZS ISO 8124 PART 1	ST PART 1
1.37 m (4.5 ft.), 4 drops	1.38 m (4.53 ft.), 10 drops for all toys weighing less than 1.4 kg (3 lb)	1.38 m (4.53 ft), 10 drops for all toys weighing less than 1.4 kg (3 lb)
1.37 m (4.5 ft.), 4 drops	0.93 m (3.1 ft.), 4 drops for all toys weighing less than 4.5 kg (10 lb)	0.93 m (3.1 ft), 4 drops for all toys weighing less than 4.5 kg (10 lb)
0.91 m (3 ft.), 4 drops		
For toys containing magnets: 1 kg mass from 100 mm	For toys containing magnets: 1 kg mass from 100mm	For toys containing magnets: 1 kg mass from 100 mm
For toys containing magnets: 3 times*	3 times*	3 times*
0.94 N-m for rattles	0.45 N-m (4 in.-lb)	0.45 N-m (4 in.-lb)
<ul style="list-style-type: none"> <li>42.5 N for all parts excluding eye/nose;</li> <li>8.95 kg, 5 minutes for eye/nose pull;</li> <li>48 N for rattle</li> </ul>	70 N (15.7 lb)	70 N (15.7 lb)
<ul style="list-style-type: none"> <li>42.5 N for all parts excluding eye/nose;</li> <li>8.95 kg, 5 minutes for eye/nose pull</li> </ul>		
42.5 N		
-	114 N (25.6 lb)	114 N (25.6 lb)
	136 N (30.5 lb)	
-	120° at a rate of 1 cycle/2 sec., rest 60 sec. every 10 cycles, 70 N (15.7 lb) bending force <ul style="list-style-type: none"> <li>For wires designed and intended to be bent: bend 30 cycles</li> <li>For wires not designed and intended to be bent but likely to occasionally or accidentally be bent: bend 1 cycle</li> </ul>	0 to 36 months: Bend 30 cycles of 120° at a rate of 1 cycle / 2 sec., rest 60 sec. every 10 cycles, 70 N (15.7 lb) bending force



## Summary of international toy safety requirements (1/2)

REQUIREMENT	USA	EUROPE	CANADA
Mechanical & physical	CPSC & ASTM F963	EN 71 Part 1	Canada Consumer Product Safety Act (CCPSA), Toys Regulations (SOR/2011-17)
Flammability (Textile materials/ pile fabrics/ pile materials)	<ul style="list-style-type: none"> <li>16 CFR Part 1610</li> <li>ASTM F963 Annex 6</li> </ul>	EN 71 Part 2	Canada Consumer Product Safety Act (CCPSA), Toys Regulations (SOR/2011-17)
Flammability (Solid materials/toy products)	<ul style="list-style-type: none"> <li>16 CFR Part 1500.44</li> <li>ASTM F963 Annex 5</li> </ul>	EN 71 Part 2	Canada Consumer Product Safety Act (CCPSA), Toys Regulations (SOR/2011-17)
Toxic elements (Heavy metal analysis)	<ul style="list-style-type: none"> <li>16 CFR Part 1303 Lead in paint</li> <li>ASTM F963 § 4.3.5 Soluble Heavy Metals (incl. A11.10)</li> <li>CPSIA</li> </ul>	EN 71 Part 3	Canada Consumer Product Safety Act (CCPSA), Toys Regulations (SOR/2011-17)
Cleanliness of stuffing materials	<ul style="list-style-type: none"> <li>ASTM F963</li> <li>Pennsylvania Stuffed Toys Act</li> <li>Massachusetts Law on Stuffed Toys</li> <li>Ohio Title 37 Health-Safety-Morals, Chapter 3713 'Bedding and Stuff Toys'</li> </ul>	EN 71 Part 1	Canada Consumer Product Safety Act (CCPSA), Toys Regulations (SOR/2011-17)
Phthalates	<ul style="list-style-type: none"> <li>CPSIA (BBP, DBP, DEHP, DCHP, DHEXP (DnHP), DIBP, DPENP and DINP)</li> <li>CA AB 1108 (2007) (BBP, DBP, DEHP, DIDP, DINP and DNOP)</li> <li>CA Prop 65 (BBP, DBP, DEHP, DIDP, DINP and DnHP)</li> </ul>	<ul style="list-style-type: none"> <li>REACH Annex XVII entries 51 and 52 (BBP, DBP, DEHP, DIBP, DIDP, DINP and DNOP)</li> <li>RoHS II (Directive 2011/65/EU - BBP, DBP, DEHP and DIBP)</li> </ul>	Canada Consumer Product Safety Act (CCPSA), Phthalates Regulations (SOR/2016-188) (BBP, DBP, DEHP, DIDP, DINP and DNOP)
Azo colourants and azo dyes	CA Prop 65	REACH Annex XVII	-
Cadmium	<ul style="list-style-type: none"> <li>200 µg extraction limit for small metallic parts</li> <li>CA Prop 65</li> </ul>	REACH Annex XVII	-
Nickel	CA Prop 65	REACH Annex XVII	-
Polycyclic aromatic hydrocarbons (PAHs)	CA Prop 65	<ul style="list-style-type: none"> <li>REACH Annex XVII</li> <li>German Product Safety Commission (AfPS) GS Specification</li> </ul>	-

\* Also prohibits mercury, asbestos, 1,4-butanediol, ammonium nitrate, strong acids and bases in toys visit [www.sgs.com/safeguards](http://www.sgs.com/safeguards)

\*\* According to the Consumer Product Safety Act, toys designed / intended for children under 36 months are mandatory to comply with ISO, EN, ASTM or ST standards for toys safety.

AUSTRALIA	INTERNATIONAL	JAPAN	CHINA	BRAZIL
AS/NZS ISO 8124 Part 1	ISO 8124 Part 1	ST Part 1 **	<ul style="list-style-type: none"> <li>GB 6675.2</li> <li>GB 5296.5 (labelling)</li> </ul>	NM 300-1
AS/NZS ISO 8124 Part 2	ISO 8124 Part 2	ST Part 2 **	GB 6675.3	NM 300-2
AS/NZS ISO 8124 Part 2	ISO 8124 Part 2	ST Part 2 **	GB 6675.3	NM 300-2
AS/NZS ISO 8124 Part 3	ISO 8124 Part 3	ST Part 3	<ul style="list-style-type: none"> <li>GB 6675.4</li> <li>GB 24613 (coatings on toy)</li> </ul>	NM 300-3
AS/NZS ISO 8124 Part 1	ISO 8124 Part 1	ST Part 1 **	GB 6675.2	NM 300-1
Competition and Consumer Act, 2010 Consumer Protection Notice No. 11 of 2011 (DEHP)	ISO 8124 Part 6	<ul style="list-style-type: none"> <li>ST Part 3</li> <li>Japan Food Sanitation Law (JFSL)</li> </ul>	<ul style="list-style-type: none"> <li>GB 6675.1</li> <li>GB 24613 (coatings on toy)</li> </ul>	Ordinance No. 302 of July 12, 2021 (BBP, DBP, DEHP, DIDP, DINP and DNOP)*
-	-	-	-	-
-	-	-	-	-
-	-	-	-	-
-	-	-	-	-



## Summary of international toy safety requirements (2/2)

REQUIREMENT	USA	EUROPE	CANADA
Battery-operated toy safety	ASTM F963 § 4.25	EN IEC 62115	Canadian Standards Association Standard C22.2 No. 149-1972
Electric toys	ASTM F963 16 CFR 1505	EN IEC 62115	Canadian Standards Association Standard C22.2 No. 149-1972
Hazardous substances in battery-operated/ electric toys	-	RoHS II (Directive 2011/65/EU)	-
Electromagnetic compatibility for battery-operated/ electric toys	-	EMC Directive 2014/30/EU	ICES Interference-causing Equipment Standard
Radio controlled frequency	FCC Part 15 Radio Frequency Devices	RED 2014/53/EU	RSS Radio Standards Specifications

AUSTRALIA	INTERNATIONAL	JAPAN	CHINA	BRAZIL
AS/NZS 62115 Consumer Goods (Products Containing Button/Coin Batteries) Safety Standard 2020	IEC 62115	ST Part 1	GB 19865	NM 300-6
AS/NZS 62115	IEC 62115	-	GB 19865	NM 300-6
-	-	-	-	-
Electromagnetic Compatibility (EMC) Regulations, C-Tick Mark, RCM	CISPR 14 Parts 1 & 2	Voluntary Control Council for Interference by Information Technology Equipment		-
Electromagnetic Compatibility (EMC) Regulations, C-Tick Mark, RCM	-	Voluntary Control Council for Interference by Information Technology Equipment	-	-





# Toy heavy metal requirements

## MAXIMUM ACCEPTABLE ELEMENT MIGRATION FROM TOY MATERIALS

STANDARDS	USA		EUROPE	
	CPSC (CPSIA)	ASTM F963	EN 71-3	
Lead in substrates in mg/kg (ppm)	100 T	–	–	–
MATERIALS	Coatings	Toy materials other than modelling clay	Modelling clay (toy)	Dry, brittle, powder-like or pliable toy material (Category I) <sup>1</sup>
REQUIREMENTS	mg/kg (ppm)	mg/kg (ppm)	mg/kg (ppm)	mg/kg (ppm)
Antimony (Sb)	–	60	60	45
Arsenic (As)	–	25	25	3.8
Barium (Ba)	–	1,000	250	1,500
Cadmium (Cd)	–	75	50	1.3
Chromium	–	60	25	–
Chromium Cr (III)	–	–	–	37.5
Chromium Cr (VI)	–	–	–	0.02
Lead (Pb)	90 T	90 T/90	90 T/90	2.0
Mercury (Hg)	–	60	25	7.5
Selenium (Se)	–	500	500	37.5
Aluminium (Al)	–	–	–	2,250
Boron (B)	–	–	–	1,200
Cobalt (Co)	–	–	–	10.5
Copper (Cu)	–	–	–	622.5
Manganese (Mn)	–	–	–	1,200
Nickel (Ni)	–	–	–	75
Strontium (Sr)	–	–	–	4,500
Tin (Sn)	–	–	–	15,000
Organotin (Organic tin)	–	–	–	0.9
Zinc (Zn)	–	–	–	3,750

All requirements are soluble content except those with T (total content)

<sup>1</sup> Scope applies to toys with applied stickers, films or surface coating materials. Common methods set out in ASTM F963, EN 71-3 and ISO 8124-3

<sup>2</sup> Toys with applied stickers, films or surface coating materials

<sup>1</sup> Toy Material Category I: Solid toy material from which a powder-like material is released during play (e.g. chalk, crayons, modelling compounds)

Toy Material Category II: Fluid or viscous toy material which can be ingested and/or to which dermal exposure occurs during play (e.g. bubble solutions, finger paints, glue sticks)

Toy Material Category III: Solid toy material with or without a coating which can be ingested as a result of biting, tooth scraping, sucking or licking (e.g. paints, rubber, PVC, plush fabrics, steel, foam, leather)

<sup>2</sup> Consumer Product Safety Act (S.C. 2010, C.21), Consumer Products Containing Lead Regulations (CPCLR), SOR/2018-83:

- Products that are brought into contact with the user's mouth during normal use
- Products for use in learning or play by children under 14 years of age
- Clothing or clothing accessories for children under 14 years of age
- Books or similar printed products for children under 14 years of age
- Childcare articles that are designed and intended to facilitate the relaxation, sleep, hygiene, carrying or transportation of a child under 4 years of age

EUROPE		CANADA	AUSTRALIA	
EN 71-3		Consumer Product Safety Act (S.C. 2010, c. 21), Toys Regulations (SOR/2011-17)	AS/NZS ISO 8124 Part 3	
–	–	90 T <sup>2</sup>	–	–
Liquid or sticky toy material (Category II) <sup>1</sup>	Scraped off toy material (Category III) <sup>1</sup>	Coatings	Toy materials other than modelling clay and finger paint	Modelling clay/ Finger paint
mg/kg (ppm)	mg/kg (ppm)	mg/kg (ppm)	mg/kg (ppm)	mg/kg (ppm)
11.3	560	1,000*	60	60/10
0.9	47	1,000*	25	25/10
375	18,750	1,000*	1,000	250/350
0.3	17	1,000*	75	50/15
–	–	–	60	25/25
9.4	460	–	–	–/–
0.005	0.053	–	–	–/–
0.5	23	90 T	90	90/25
1.9	94	10**	60	25/10
9.4	460	1,000*	500	500/50
560	28,130	–	–	–
300	15,000	–	–	–
2.6	130	–	–	–
156	7,700	–	–	–
300	15,000	–	–	–
18.8	930	–	–	–
1,125	56,000	–	–	–
3,750	180,000	–	–	–
0.2	12	–	–	–
938	46,000	–	–	–

# Japan toy safety

## JAPAN CONSUMER PRODUCT SAFETY ACT (CPSA)

In Japan a new Consumer Product Safety Act came into force on December 25, 2025. The act applies to infant toys (toys intended for children under 36 months).

After the 25th of December infant toys need to mark with the Product Safety of Consumer Products mark (PSC) in an easy visible location on the product/packaging. See example:



Infant toys that comply with the following standards are deemed to comply with the technical standards:

- ISO 8124-1:2022 and ISO 8124-2:2023,
- EN 71-1:2014+A1:2018 and EN 71-2:2020, or
- ASTM F963-23 (limited to sections 4.1, 4.2, 4.5 to 4.19, 4.21 to 4.28, and 4.30 to 4.41)

In addition, the Japanese ST2025 standard is applicable for toys that apply for the ST mark scheme, as the ST2025-1 standard covers all requirements in ISO 8124-1 and ST2025-2 is identical to ISO 8124-2. Complying with the ST2025-1,2 standard can be considered as fulfilling the new PSC mark requirement for toys.

Note that interpretations that meet technical standards are not limited to those listed here, and may be deemed compliant with technical standards if supported by sufficient technical justification.

The age range must be displayed in a manner easily understandable to the general Japanese consumer (in Japanese):

- Acceptable (must be in Japanese):
  - „Age range: 1 year and up“
  - „Target age: 6 months and older“
- Not acceptable:
  - „1+“
  - „For Children Ages 1-3 years“, or
  - Other labels consisting solely of numbers, symbols, shapes, or foreign languages
- The wording listed in the required text section may be modified as long as the meaning remains unchanged

ACCEPTABLE	NOT ACCEPTABLE
対象年齢: 1歳以上	1+
歳未満の子どもには与えないでください	2
	Ages 1+
	①





# Japan toy safety standard ST 2016 part 3

MATERIALS OF TOYS	TEST ITEM	MAXIMUM REQUIREMENT
PVC excluding coatings	Arsenic	≤ 0.1 µg/ml (as arsenious acid)
	Cadmium	≤ 0.5 µg/ml
	Evaporation residue	≤ 50 µg/ml
	Heavy metals	≤ 1 µg/ml (as lead)
	Potassium permanganate consumption	≤ 50 µg/ml
Polyethylene (PE)	Arsenic	≤ 0.1 µg/ml (as arsenious acid)
	Evaporation residue	≤ 30 µg/ml
	Heavy metals	≤ 1 µg/ml (as lead)
	Potassium permanganate consumption	≤ 10 µg/ml
	DIDP	0.1 %
	DNOP	0.1%
Decalcomania/Folded paper and rubber made toys (excluding rubber pacifiers)	Arsenic	≤ 0.1 µg/ml (as arsenious acid)
	Heavy metals	≤ 1 µg/ml (as lead)
	Lead	1 µg/ml
	Arsenic	0.1 µg/ml
PVC Coatings	Evaporation residue	≤ 50 µg/ml
	Potassium permanganate consumption	≤ 50 µg/ml
Paint coatings, including PVC coatings, applied to the body or the components of toys (excluding printing inks used for paper containers)	Soluble heavy metals	≤ 60 mg/kg (antimony)
		≤ 25 mg/kg (arsenic)
		≤ 1000 mg/kg (barium)
		≤ 75 mg/kg (cadmium)
		≤ 60 mg/kg (chromium)
		≤ 90 mg/kg (lead)
		≤ 60 mg/kg (mercury)
≤ 500 mg/kg (selenium)		
Small part metal, including jewelry	Lead	≤ 90 µg/ml
Rubber Pacifiers	Evaporation residue	≤ 40 µg/ml
	Formaldehyde	Negative
	Heavy metal content (lead and cadmium)	≤ 0 µg/g each
	Heavy metals	≤ 1 µg/ml (as lead)
	Phenol	≤ 5 µg/ml
	Zinc	≤ 1 µg/ml

MATERIALS OF TOYS	TEST ITEM	MAXIMUM REQUIREMENT
Textiles	Formaldehyde	≤ 16 µg/g (toys for children aged 24 months or under)
		≤ 75 µg/g (toys for children over 24 months that are in direct contact with the human body for some time during use)

Phthalate	Toys intended to come into direct contact with infant's mouth			Other designated toys (PVC, PU, rubber)
	Parts that come into direct contact with mouth	Other parts		
		PVC, PU or rubber	PVC	
DEHP	≤ 0.1%	≤ 0.1%	≤ 0.1%	≤ 0.1%
DBP	≤ 0.1%	≤ 0.1%	≤ 0.1%	≤ 0.1%
BBP	≤ 0.1%	≤ 0.1%	≤ 0.1%	≤ 0.1%
DINP	≤ 0.1%	≤ 0.1%	Not restricted	Not restricted
DIDP	≤ 0.1%	Not restricted	Not restricted	Not restricted
DNOP	≤ 0.1%	Not restricted	Not restricted	Not restricted

## Soap Bubble Solution

PARAMETER	STANDARD (SOAP BUBBLES)	
	Soap bubbles manufactured from straw-type toys (straw placed directly in mouth when soap bubbles are blown and constructed to prevent ingestion of bubble solution)	Soap bubbles produced by non-straw-type toys
Surface active agent	≤ 3%	≤ 3%
Fluorescent brightener	Negative	Negative
Heavy metals (as lead)	≤ 1 µg/g	≤ 1 µg/g
Volume of soap bubble solution	≤ 30 ml	≤ 600 ml

## Ink and Similar Materials Used for Graphic Instruments

ITEM	PARAMETER	REQUIREMENT
1	Aged 3 to below years old	• Colorants from Schedule 1 of Japan Food Sanitation Law (JFSL) allowed otherwise migration is not allowed
2	Aged 6 and up	• Colorants from Schedule 1 of JFSL allowed otherwise migration is 10 times less relative to standard solution



## US third-party testing requirement

USA Federal Law 16 CFR 1107 requires all children's products manufactured on or after 8 February 2013 to have third-party tests to support the Children's Product Certificate (CPC)

- Component testing is allowed in accordance with 16 CFR 1109
- Special allowances are made for small batch manufacturers

## Warning for US toys

The Consumer Product Safety Commission (CPSC) 16 CFR 1500.19 / ASTM F963 requires a small parts hazard warning label on certain toys and games intended for children over 3 but not older than 6 years.

It also specifies cautionary labelling is required on small balls (with a diameter of 1.75 in. or less), balloons and marbles.

The warning must be conspicuous on the principal display panel, as well as on any accompanying literature (i.e. instructions).

Note:

<sup>1</sup> The exclamation mark inside the equilateral triangle must be at least half the height of the triangle.

<sup>2</sup> The signal word "WARNING" must be separated from the triangle (distance f) by at least the size of the first letter of the signal word, i.e. "W".

<sup>3</sup> This statement layout can be in a square or rectangular shape, with or without border.

## DIMENSIONAL REQUIREMENTS

a		b
c		d
<b>CHOKING HAZARD - Small parts</b>		
Not for children under 3 years.		



AREA OF PRINCIPAL DISPLAY PANEL (SQUARE INCHES)	TRIANGLE HEIGHT	SIGNAL WORD	HAZARD STATEMENT	OTHER CAUTIONARY MATERIAL
	Size a	Size b	Size c	Size d
0-2	> 3/64 in.	3/64 in.	3/64 in.	1/32 in.
> 2-5	> 1/16 in.	1/16 in.	3/64 in.	3/64 in.
> 5-10	> 3/32 in.	3/32 in.	1/16 in.	1/16 in.
> 10-15	> 7/64 in.	7/64 in.	3/32 in.	1/16 in.
> 15-30	> 1/8 in.	1/8 in.	3/32 in.	5/64 in.
> 30-100	> 5/32 in.	5/32 in.	7/64 in.	3/32 in.
> 100-400	> 1/4 in.	1/4 in.	5/32 in.	7/64 in.
> 400	> 1/2 in.	1/2 in.	1/4 in.	5/32 in.

## Relevant US toy legislation

CITATION	SUBSTANCE
<b>FEDERAL</b>	
16 CFR 1500 Hazardous Substances and Articles (Federal Hazardous Substances Act, FHSA)	Hazardous substances
US Public Law 110-314 (Consumer Product Safety Improvement Act of 2008, CPSIA)	<ul style="list-style-type: none"> <li>• Lead content</li> <li>• Phthalates*</li> </ul>
Toxic Substances Control Act Title VI (TSCA Title VI) (Formaldehyde Standards for Composite Wood Products Act)	Formaldehyde
<b>CALIFORNIA</b>	
California Air Resources Board (CARB) 'Airborne Toxic Control Measure (ATCM) to Reduce Formaldehyde Emission from Composite Wood Products'	Formaldehyde
Health and Safety Code Division 104. Environmental Health Part 3. Product Safety Chapter 11 'Phthalates in Products for Young Children'	Phthalates**
Proposition 65 (Prop 65)	Prop 65 list of chemicals
<b>ILLINOIS</b>	
Lead Poisoning Prevention Act (LPPA)	Lead content
<b>MAINE</b>	
Title 38, Chapter 16-D, Toxic Chemicals in Children's Products	Priority chemicals (PCs)
Title 38, Chapter 16, Sale of Consumer Products Affecting the Environment	Per- and polyfluoroalkyl substances (PFAS)
<b>MINNESOTA</b>	
Statute § 325E.3892 Lead and Cadmium in Consumer Products; Prohibition	Lead and cadmium
<b>NEW YORK</b>	
Environmental Conservation Law Article 37 Title 9 'Toxic Chemicals in Children's Products'	<ul style="list-style-type: none"> <li>• Chemicals of concern/high priority chemicals</li> <li>• Asbestos, benzene and tris (1,3-dichloro-2-propyl) phosphate</li> </ul>
<b>OREGON</b>	
ORS § 431A.253 to § 431A.280 Toxic-Free Kids Act (Chapter 786, 2015)	High priority chemicals of concern for children's health (HPCCCHs)
<b>VERMONT</b>	
18 V.S.A. Chapter 38A, Act 188 (2013-2014)	Chemicals of high concern to children (CHCCs)
<b>WASHINGTON</b>	
RCW Chapter 70.240 (Children's Safe Products Act, CSPSA)	<ul style="list-style-type: none"> <li>• Cadmium, lead and phthalates**</li> <li>• Chemicals of high concern to children (CHCCs)</li> </ul>
<b>STATE AND LOCAL LAWS</b>	
California, Hawaii, Illinois, Maine, Maryland, Massachusetts, Michigan, Minnesota, Nevada, New York, Oregon, Rhode Island, Vermont, Washington and Washington D.C.	Flame retardants (requirements are dependent on jurisdiction)

\* BBP, DBP, DEHP, DCHP, DHEXP (DnHP), DIBP, DPENP and DINP

\*\* BBP, DBP, DEHP, DIDP, DINP and DNOP





## NEW EU Toy Safety Regulation (TSR)

The new EU Toy Safety Regulation 2025/2509 is published on 12 December 2025. The main changes are additional chemical requirements and the introduction of the Digital Product Passport (DPP). The DPP will replace the current Declaration of Conformity (DoC).

The transitional period ends on August 1, 2030. During the transitional period both the current Toy Safety Directive 2009/48/EC and the Toy Safety Regulation 2025/2509 may be used to show compliance.

## EU Toy Safety Directive (TSD)

The Toy Safety Directive 2009/48/EC applies to products designed or intended, whether or not exclusively, for use in Play by children under 14 years of age.

## EU Toy Safety Directive (TSD) – safety assessment

All toys placed on the EU market are obliged to undergo a safety assessment (including chemical safety assessment). These toys should be designed and manufactured in accordance with the safety requirements in the directive.

## EU TSD – obligations for economic operators

The following economic operators have certain legal obligations under the TSD:

1) OBLIGATIONS FOR MANUFACTURERS
• Ensure toys comply with essential and particular safety requirements
• Perform safety assessment to identify hazards that a toy may present
• Draw technical documentation with stringent requirements for chemicals (keep 10 years)
• Draw EC declaration of conformity (DoC) and keep for 10 years
• Ensure production control
• Ensure toys contain information on the type, batch, serial or model number for identification
• Name and address of manufacturer
2) OBLIGATIONS FOR IMPORTERS
• Place only compliant toys on the market
• Check manufacturer used appropriate production control
• Check manufacturer's technical documentation and marking
• Check manufacturer has carried out appropriate conformity assessment procedures
• Name and address of importer
3) OBLIGATIONS FOR DISTRIBUTORS
• Make toys available on the market with due care to applicable requirements
• Verify CE-marking, EC DoC, relevant documentation, instructions supplied in relevant language(s), type, batch, serial or model number as well as name and address of manufacturer and importer

## EU TSD – technical documentation

### DETAILS DESCRIPTION OF DESIGN/MANUFACTURE

- Product identification (Product description, name, type, model/lot/batch/serial no., no. of items, etc.)
- Colour picture (of sufficient clarity)
- Description of intended use
- Age suitability/age grading
- BOM (Bill of Materials) and/or BOS (Bill of Substances)
- SDS (Safety Data Sheets) on chemicals (To be provided if applicable – e.g. mixtures such as liquids, inks, paints, adhesives, etc.)
- Copy of packaging
- Copy of instructions, leaflet or other documents

### SAFETY ASSESSMENT DOCUMENTATION

- Analysis of potential hazards that a toy may present

### DESCRIPTION OF THE CONFORMITY ASSESSMENT PROCEDURE FOLLOWED

- Option 1: self assessment/internal product control
- Option 2: third-party assessment

### TEST REPORTS

### COPY OF EC DECLARATION OF CONFORMITY (DOC)

- Complete all relevant harmonised legislation and standards, including Directive 2009/48/EC, REACH, EN 71, EMC etc, and signed by the manufacturer
- Translated in all languages required by member state (model structure set out in ANNEX III)

### COPY OF EC TYPE EXAMINATION CERTIFICATE

If applicable

### ADDRESSES OF MANUFACTURE AND STORAGE



## EU TSD – EC declaration of conformity

### A REQUIREMENT FOR MANUFACTURERS

- When a toy is placed on the market, the manufacturer must draw up an EC Declaration of Conformity (DoC). By doing so, the manufacturer certifies and assumes responsibility for the compliance of the toy with the essential requirements of the Toy Safety Directive
- The manufacturer shall prepare a completed EC DoC, referring to all relevant standards including EMC, REACH, etc.
- The manufacturer shall translate the EC DoC in all languages of EU countries where the toy will be placed
- The manufacturer shall sign the declaration
- The manufacturer and/or importer shall keep the DoC in the technical documentation for 10 years after the toy has been placed on the market
- There is a requirement to continuously update the DoC should changes be necessary

### TEMPLATE

#### PRODUCT COVERED BY THIS DECLARATION

\_\_\_\_\_ (Product's name, including colour image)

\_\_\_\_\_ (Type, batch no.: unique identification)

#### MANUFACTURER OR HIS AUTHORISED REPRESENTATIVE

\_\_\_\_\_ (Name and address)

This Declaration of Conformity is issued under the sole responsibility of the manufacturer.

#### THE PRODUCT IDENTIFIED ABOVE COMPLIES WITH THE FOLLOWING EU DIRECTIVES

\_\_\_\_\_ (List all relevant EU directives)

#### THE PRODUCT IDENTIFIED ABOVE COMPLIES WITH THE FOLLOWING STANDARDS

\_\_\_\_\_ (List all relevant standards)

(In case of EC type examination)

#### EC TYPE EXAMINATION CARRIED OUT BY NOTIFIED BODY

\_\_\_\_\_ (Name, number Notified Body)

\_\_\_\_\_ (EC type examination certificate)

#### SIGNED BY MANUFACTURER/REPRESENTATIVE

\_\_\_\_\_

#### PLACE/DATE

\_\_\_\_\_

## EU TSD – warnings for EU toys – requirements

- User limitations must contain at least the minimum or maximum age of the user
- Economic operators may choose between the age warning phrase or pictogram (or both): for example, "Not suitable for children under 36 months"
- The warning must be preceded by the word "Warning" or "Warnings" as appropriate. Printing ONLY the pictogram on the front panel packaging is allowed in case the full warning (the warning text/pictogram preceded by the word warning) is printed on another location on the packaging as well
- The warning "Not suitable for children under 3 years" must be accompanied by a short description of the hazard concerned. This hazard description can be located on the toy, on the packaging or on an accompanying leaflet
- The specific warning "Not suitable for children under 3 years" and an age warning pictogram may not be misused and may never be used for toys intended for children under 3 years
- Warnings need to be translated into the official language(s) of the country of destination
- Toys should bear the CE mark
- Toys should be traceable, bearing a traceability marking
- A Declaration of Conformity should be available
- Must be included in the technical documentation





## EU TSD – chemical requirements

All toys placed on the EU market must comply with all EU standards and regulation related to chemicals, including REACH.

Appendix C of Annex II to the TSD – toys intended for children under 36 months or in other toys intended to be placed in the mouth are also required to comply with the following:

- BPA migration and 3 flame retardants (TCEP, TCPP and TDCP)
- 4 Preservatives (BIT, CMI, MI and CMI:MI (3:1)) in toys containing water
- Formamide in toys containing foam materials
- Phenol in toys containing polymeric materials, and when used as a preservative
- Formaldehyde migration in polymeric materials, formaldehyde emission in resin-bonded wood materials and formaldehyde content in textile, leather, paper and water-based materials
- Aniline – after reductive cleavage in textiles, leather or finger paints & free aniline in finger paints

### CHEMICAL SAFETY ASSESSMENTS

- Assessment shall be carried out before placing the toy on the market
- Must be included in the technical documentation

### CMRS

- Ban on substances classified as carcinogenic, mutagenic or reprotoxic (toxic for reproduction) (CMR substances, certain exemptions apply)

### FRAGRANCES

- 58 allergenic fragrances are allowed provided their presence is technically unavoidable under GMP and the concentration of each fragrance does not exceed 100 mg/kg
- Additional 71 allergenic fragrances shall be listed on the toy, an affixed label, packaging or in an accompanying leaflet, if exceeding 100 mg/kg

### EN 71-3 (MIGRATION OF CERTAIN ELEMENTS)

- Migration limits for 19 elements
- Two types of chromium: chromium (III) and chromium (VI)
- Two types of tin: tin and organic tin
- In order to consider the different exposures, 3 types of material are distinguished:
  - Category 1: Dry, brittle, powder-like or pliable toy materials
  - Category 2: Liquid or sticky toy materials
  - Category 3: Scraped-off toy materials

### EN 71-4 (EXPERIMENTAL SETS FOR CHEMISTRY AND RELATED ACTIVITIES)

- Experimental sets for chemistry and related activities including crystal growing sets, carbon dioxide generating experimental sets and supplementary sets
- Sets requirements for maximum quantity or maximum concentration of certain substances and mixtures
- Specifies requirements for marking, a contents list, instructions for use, eye protection and for the equipment intended for carrying out experiments

### EN 71-5 (CHEMICAL TOYS (SETS) OTHER THAN EXPERIMENTAL SETS)

- Applies to the following toy products
  - Adhesives, paints, lacquers, varnishes, thinners and cleaning agents (solvents), supplied or recommended in model sets
  - Embedding sets
  - Oven-hardening plasticised PVC modelling clay sets
  - Plaster of Paris (gypsum) moulding sets
  - Polystyrene granules sets
- Sets requirements and test methods for substances and materials used in chemical toy (sets) other than experimental sets
- Specifies requirements for markings, warnings, safety rules, contents list, instructions for use and first aid information

### EN 71-7 (FINGER PAINTS – REQUIREMENTS AND TEST METHODS)

- Specifies requirements for substances and materials used, markings, labelling and containers

### EN 71-12 (N-NITROSAMINES AND N-NITROSATABLE SUBSTANCES)

- Specifies requirements and test methods for
  - Toys and parts of toys made of elastomers and intended for use by children under 36 months
  - Toys and parts of toys made of elastomers and intended to be placed in the mouth
  - Finger paints for children under 36 months

### EN 71-13 (OLFACTORY BOARD GAMES, COSMETIC KITS AND GUSTATIVE GAMES)

- Specifies requirements on the use of substances and mixtures in these games and kits and supplementary sets to such products

### DENMARK

- Order No. 947 of 20/06/2020 'Prohibition of Phthalates in Toys and Childcare Articles' for children aged 0-3 years

### FRANCE

- BPA in teething rings (Act 2012-1442 of 24 December 2012)



## GERMANY

- N-nitrosamines and n-nitrosatable substances (Consumer Goods Ordinance (Bedarfsgegenständeverordnung), Decision 2012/160/EU)

## UNITED KINGDOM

- Due to Brexit, manufactured goods placed on the Great Britain market (GB market – England, Wales and Scotland) require UKCA or CE marking. Qualifying Northern Ireland goods being placed on the GB market under unfettered access require CE or CE and UKNI markings

Further information can be found in UK's [Guidance: Using the UKCA marking or Using the UKNI marking](#)

## Relevant EU toy legislation

### ALL TOYS

- Regulation (EU) 2023/988 General Product Safety Regulation (GPSR)
- Directive 2009/98/EC (Waste Framework Directive (WFD), SVHCs)
- Regulation (EC) 1907/2006 REACH (including restricted substances, SVHCs)
- Regulation (EC) 1272/2008 on the Classification, Labelling and Packaging of Substances and Mixtures (CLP Regulation)
- Regulation (EU) 2019/1021 on persistent organic pollutants (POP Recast Regulation)

### ELECTRICAL & ELECTRONIC TOYS

- Directive 2011/65/EU (RoHS Recast, RoHS II)
- Directive 2014/53/EU (Radio Equipment Directive, RED)
- Directive 2014/30/EU (Electro Magnetic Compatibility, EMC)
- Regulation (EU) 2023/1542 (Batteries)
- Directive 2014/35/EU (Low Voltage)

### COSMETIC TOYS

- Regulation (EC) 1223/2009 (Cosmetics)

### FOOD CONTACT MATERIALS & ARTICLES

- Regulation (EC) No 1935/2004 (Food contact)
- Regulation (EU) No 10/2011 (Food contact plastics)

### PACKAGING & RECYCLING

- Directive 94/62/EC ; Regulation (EU) 2025/40 (Packaging and packaging waste)
- Directive 2012/19/EU (Waste Electrical and Electronic Equipment, WEEE Recast)

## Other jurisdictions on toy safety

JURISDICTION	CITATION
Albania	• Decision No. 262 of April 3, 2013, for the Approval of the Technical Regulation 'For the Safety of Toys'
Colombia	• Resolution 686 of March 5, 2018
Georgia	• Resolution No. 47 of January 20, 2020 'Approving the Technical Regulation on Toy Safety'
India	• Notification No. 26/2015-2020 'Import Policy', amended by Notification No. 33/2015-2020 • Toys (Quality Control) Order 2020, as amended
Indonesia	• Ministry of Industry Decree No.55/M-IND/PER/11/2013, amended by Regulation Ministry of Industry No. 24/M-IND/PER/4/2013 • Regulation of Director General Of Industrial Manufacturing No. 02/BIM/PER/1/2014
Kosovo	• Regulation (MTI) No 2/2017 on Safety of Toys
Malaysia	• The Consumer Protection (Safety Standards for Toys) Regulations 2009
Moldova	• Decision No. 808 of October 29, 2015 for the Approval of the Technical Regulation on Toy Safety • Decision No. 643 of October 1, 2025 for the Approval of the Technical Regulation on the Restriction of the Use of Certain Hazardous Substances in Electrical and Electronic Equipment
Montenegro	• Rule Book on the Safety of Toys (OGM No 4/2015 of 28.01.2015)
Serbia	• Rule Book on Toy Safety (RS No. 78/2019)
Singapore	• Consumer Protection (Consumer Goods Safety Requirements) Regulations 2011 (CGSR)
Switzerland	• Toys Ordinance SR/RS 817.023.11
Turkey	• Toy Safety Regulation (number 29847 of October 4, 2016)
Ukraine	• Resolution No. 151 of February 28, 2018 on Approval of the Technical Regulation on Toy Safety
Vietnam	• National Technical Regulation on Safety of Toys QCVN 3:2019/BKHCHN

*This document contains guidance on toy testing for the quality assurance industry. Its content is subject to changes due to new market requirements.*

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