

# UNDERSTANDING THE EU TOY SAFETY REGULATION

## FROM DIRECTIVE TO REGULATION

The European Commission has published the Toy Safety Regulation 2025/2509 (TSR), replacing the current Toy Safety Directive 2009/48/EC (TSD). What does this mean for you and your business?

Our experts are here to support you in understanding and preparing for the adoption of the new regulation.

## BACKGROUND

In force since 2011/2013, the TSD applies to all toys placed on the market in the EU, regardless of their country of production.

In 2020, the European Commission held an evaluation that identified the following shortcomings:

- Insufficient protection from hazardous chemicals
- Too many unsafe and non-compliant toys were reaching EU markets, especially through online sales – toys are currently the one of the most recalled product category in the EU

## TOY SAFETY REGULATION 2025/2509

On December 12, 2025, the European Commission published the TSR to address these problems. The TSR applies to all products designed or intended, whether or not exclusively, for use in play by children under 14 years of age. A new clarification states that “intended for use” should be interpreted as how parents or supervisors can reasonably assume that the toy will be used.

## REGULATION VERSUS DIRECTIVE

There are several important differences between the current TSD and the TSR.

## CHEMICAL REQUIREMENTS

- Ban of CMR substances extended to include:
  - Endocrine disruptors (category 1 or 2)
  - Specific target organ toxicity substances (category 1) (either in single or repeated exposure)
  - Respiratory sensitizers (category 1)
  - Skin sensitizers (category 1A)
- Intentionally added PFAS prohibited – ‘PFAS’ defined as any substance containing at least one fully fluorinated methyl (CF<sub>3</sub>-) or methylene (-CF<sub>2</sub>-) carbon atom (without any H/Cl/Br/I attached to it)
- Ten specified bisphenols prohibited
- Toys should not be biocidal products
- The restrictions for specific substances that previously applied only for toys for children under three years now apply for all ages – TCEP, TCPP, TDCP, formamide, BIT, CIT, phenol, formaldehyde and aniline
- Several substance limits amended
- Additional allergenic fragrances added to the list of prohibited substances. Their presence is only permitted if technically unavoidable under GMP and must not exceed 10 mg/kg (reduced from the current 100 mg/kg)



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## DIGITAL PRODUCT PASSPORT

- Updates and replaces the current EC Declaration of Conformity (DoC)
- Must be accessible through a data carrier (via a QR code), preferably on the toy or label attached to the toy. For small toys, it may appear on the packaging
- Must contain the following additional details:
  - Commodity code under which the toy is classified
  - CE marking
  - List of allergenic fragrances that are present in the toy
  - Substances of concern present in the toy

## CE MARK

Current CE mark requirements remain.

The CE mark must be affixed to the toy, label or packaging, and must be visible from the outside of the packaging.

A warning symbol can be used instead of the word 'warning.'

## TRANSITIONAL PERIOD

Directive 2009/48/EC will be repealed on August 1, 2030. After this date, only Regulation 2025/2509 will apply.

## OUR SERVICES

### Training and consultancy

Tailored programs and expert guidance to ensure your teams are fully prepared.

### Safety assessment

Develop comprehensive toy safety assessments (chemical and non-chemical) to identify, mitigate and eliminate hazards.

### Product testing

Verify compliance with harmonized toy safety standards, including EN 71-3, EN 71-2, EN IEC 62115, etc.

### Safety data sheets (SDS)

Prepare or review SDS for substances and mixtures to meet regulatory requirements.

### Regulatory compliance

Support adherence to key legislation such as REACH, RoHS Recast, food contact regulations, etc.



## WHY CHOOSE SGS?

We are SGS – the world's leading testing, inspection and certification company. Recognized as the global benchmark for sustainability, quality and integrity, our comprehensive solutions, delivered through a global network of state-of-the-art testing facilities, will ensure your business is ready for the EU Toy Safety Regulation.

## CONTACT US

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