

SAFE GUARDS

SGS CONSUMER TESTING SERVICES

HARDLINES

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GUIDANCE DOCUMENT NO.12 : ON APPLICATION OF THE DIRECTIVE ON THE SAFETY OF TOYS

In order to provide you information on the new EU toy safety directive 2009/48/EC SGS will issue regular publications under the title "getting ready". In our [SafeGuards 163/10](#) we informed you regarding toys with food and new requirements for packaging of toys. This publication will inform you about the definition of toys and packaging as specified in the [EU commission guidance document No 12](#).



EN 71-1:2005+A9:2009 contains requirements for Flexible plastic sheeting used in toys (clause 4.3), Toy bags (clause 4.4) and Packaging (clause 6).

| DEFINITION IN EN71-1 | |
|----------------------|--|
| 3.25, Packaging | Material accompanying the toy when purchased but having no intended play function. |
| 3.28, Plastic Sheet | Thin section plastic sheeting which is used as part of the packaging |

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PACKAGING & PLASTIC SHEETING

Packaging

- a. Can be re-used, might be of a style that encourages it to be used as a means
- Storing the toy
 - Keeping it clean
 - Transporting the toy
 - Keeping the parts together
- b. Can be used as background decoration to help display the toy in an appealing way.

Above mentioned are all attributes of "packaging". There is no play value or intended play function related to "packaging".



Source: EUROPEAN COMMISSION ENTERPRISE AND INDUSTRY DIRECTORATE-GENERAL GUIDANCE DOCUMENT No. 12 ON THE APPLICATION OF THE DIRECTIVE ON THE SAFETY OF TOYS (88/378/EEC and 2009/48/EC) – Packaging, Last updated: 25/05/2010

PACKAGING & PLASTIC SHEETING

Plastic Sheeting (used in packaging)

Example:

The plastic sheeting is used to wrap the clay in order to prevent it from contamination and drying out during transport and storage. It does not have an intended play function.

Remark:

If potential hazards exist with packaging that are not covered by the Toy Safety Directive, there is other Community legislation that regulates the safety of products, like for instance the General Product Safety Directive (GPSD).



PACKAGING & PLASTIC SHEETING IS (PART OF) A TOY

Packaging and plastic sheeting are regarded as (part of) a toy in case of:

- Packaging with additional features adding play value.
- Packaging becomes a product intended to be played with by children under 14 years of age.
- The outer boxes of board games commonly contain information on how to play the game. In this way the packaging becomes an integral part of the toy.
- Plastic sheeting is used as part of a toy

Examples of plastic sheeting used as part of a toy :

Aprons, nurses badges, nurses caps, dolls diapers, glued on transparent plastic sheeting covering children's books, ...etc.

TOY BAGS

Toy bags are not defined in the Toy Safety Directive nor in the standard EN 71-1. However, they are different from packaging as they are not covered by Packaging (clause 6) of the standard. Toy bags address bags that are clearly intended for use in play, often having features that are designed to encourage the child to use the bag in play activities.

The reference to toy bag in the standard may result in confusion and more and more bags (bags considered as packaging having no intended play function) being wrongly treated as "toy bags". Toy bags have to comply with clause 4.4 of the standard, but also with other relevant clauses as these products are toys and not packaging. Bags that are packaging can be attractive to children because they are brightly coloured for example or have child appealing characteristics (Mickey Mouse decorations) but this is not enough to make them a toy bag. There is a difference between a child appealing article like a decorated bag and a so-called toy bag.



SGS is committed to inform interested parties as developments on toy safety and other legislation occur.

Throughout our global network of laboratories, we are able to provide a range of services, including analytical testing and consultancy for toys for the EU and international markets. Please do not hesitate to contact us for further information.

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