

SAFEGUARDS

CONSUMER GOODS AND RETAIL

TOYS & JUVENILE PRODUCTS

NO. 147/14 AUGUST 2014

EU PUBLIC CONSULTATION FOR PROPOSAL TO REVISE LIMITS FOR CHROMIUM (VI) IN TOYS

The EU has recently launched a public consultation for a proposal to revise the limits for soluble chromium (VI) under the Toy Safety Directive (TSD). The final date for comments will be 28 September 2014.

In June 2009, the TSD was published in the Official Journal of the European Union (OJEU)¹. The TSD was implemented in 2 phases and has been in full force since July 2013.

On 1 August 2014, the European Commission and the Scientific Committee on Health and Environmental Risks (SCHER) launched a public consultation on the opinion to consider whether to revise the migration limits for chromium (VI) under the Toy Safety Directive 2009/48/EC (TSD)². It has to be considered that whether or not the newly proposed limits will make it to a formal revision of TSD needs further discussion among stakeholders and European legislators.

The migration limits under the TSD are based on a 2008 report of the Netherlands National Institute for Public Health and the Environment (RIVM)³ and the opinion of the Scientific Committee⁴. These limits were in the absence of data for cancer potency after oral uptake.

According to the preliminary opinion, new available evidence indicated that the carcinogenic effects of chromium (VI) from in vivo studies also have relevance for humans. The SCHER considers that the oral exposure route of children to chromium (VI) from toys as the most important with respect to potential carcinogenic effects. The SCHER is of the opinion that the current migration limits for chromium (VI) from toys should be revised and the recommendation of SCHER is to reduce the amount of Cr(VI) in the toy materials as much as technically achievable. Under the proposal, the migration limits for chromium (VI) would be more stringent for all 3 toy material categories; with limits proposed to be lowered by 21-25 fold.

Interested parties are invited to submit comments on the preliminary opinion by 28 September 2014.

Highlights of the proposal are summarised in Table 1.



¹ [SGS-Safeguard 124/08](#)

² [Public consultation on the preliminary opinion on chromium VI in toys, SCHER, 1 August 2014, Preliminary opinion on chromium VI in toys, SCHER, 29 July 2014.](#)

³ [Chemicals in Toys, A general methodology for assessment of chemical safety in toys with a focus on elements, RIVM report 320003001/2008](#)

⁴ [Evaluation of the migration limits for chemical elements in toys, SCHER, 1 July 2010](#)

TABLE 1.

	TOY MATERIAL		
	MIGRATION LIMIT FOR CHROMIUM (VI) (MG/KG)		
	Category I (Dry, brittle, powder like or pliable)	Category II (Liquid or sticky)	Category III (Scraped-off)
Toy Safety Directive (TSD)	0.02	0.005	0.2
Proposal from SCHER	0.0008	0.0002	0.0094

DEFINITIONS AND EXAMPLES OF TOY MATERIALS

TOY MATERIAL CATEGORY	TOY MATERIAL	EXAMPLES
I	Dry, brittle, powder-like or pliable	<ul style="list-style-type: none"> Compressed paint tablets Chalk, crayons, plaster of Paris, magic sand, modelling compounds, plasticine Oven hardened PVC modelling compounds, bouncing putty
II	Liquid or sticky toy	<ul style="list-style-type: none"> Bubble solutions, poster paints, finger paints Liquid adhesives, glue sticks, slimes
III	Scraped-off	<ul style="list-style-type: none"> Surface coating materials (paints, varnish) Polymers (Polystyrene, ABS, PVC, polypropylene (PP), rubber, EVA foam, elastomers, leatherette) Wood (fibreboards, chipboards, plywood) Textiles (fuzzy felts, cotton wool, polyester staple fibres, plush fabrics) Glass, ceramics (marbles, fibre glass) Metals and alloys (steel, nickel-silver) Other materials (leather, bone, natural sponge)

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including 4 EU Notified Bodies (France, UK, Germany and Netherlands), SGS is the partner to trust. Please do not hesitate to contact us for further information or [visit our website](#).

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