

SAFEGUARDS

SGS CONSUMER TESTING SERVICES

TOYS & JUVENILE PRODUCTS

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RoHS 2 COMPLIANCE FOR E&E TOYS

The new RoHS 2 [directive 2011/65/EU](#) will come into force on 2nd January 2013. For products that are new in the scope, the regulation comes into force on 22nd of July 2019.

What does this mean for toys?

The regulation applies to electrical and electronic equipment that is defined as: 'electrical and electronic equipment' or 'EEE' means equipment which is dependent on electric currents or electromagnetic fields in order to work properly and equipment for the generation, transfer and measurement of such currents and fields and designed for use with a voltage rating not exceeding 1 000 volts for alternating current and 1 500 volts for direct current;

Essential is the new definition of 'dependent' (art 3.2 in RoHS 2): 'dependent' means, with regard to EEE, needing electric currents or electromagnetic fields to fulfil at least one intended function.

At least one intended function means that even if the electric function is only a minor/secondary element of the equipment, the definition still applies.

In the [RoHS 2 guidance](#) a singing teddy bear is given as an example of a product with minor E&E functions.

In the former directive 2002/95/EC toys with minor/secondary E&E functions, like the example of the singing teddy bear were not in scope which was explained in a RoHS 1 FAQ document by the European Commission. The functionality was regarded minor/secondary as the bear still has a play value without the (singing) E&E functionality.

The scope of the RoHS 2 directive has been modified to include all toys with an E&E function.

According to RoHS 2 all toys with an intended function needing electricity will eventually need to comply with the RoHS 2 directive. This includes both toys with major/primary and minor/secondary functionalities.

RoHS 2 additionally introduces the requirements of an EU Declaration of Conformity and CE mark labelling. Consequently the RoHS requirements need to be considered by manufacturers when compiling the technical documentation for E&E toys.

The implementation dates for different types of toys are different as:

- **E&E toys with minor/secondary functions** have not been in scope of the 2002/95/EC directive. Due to this they have to be compliant to RoHS substance restrictions by 22nd July 2019 as they are defined as new in the scope of RoHS 2 2011/65/EU under category 7.
- **All other EE toys** need to be compliant to RoHS substance restrictions by 2nd January 2013 as they have been in the scope of RoHS 2002/95/EC, category 7.

The logo for SGS, consisting of the letters 'SGS' in a bold, sans-serif font. A vertical line is positioned to the right of the 'S', and a horizontal line is positioned below the 'G' and 'S', forming a partial frame around the text.

Incomplete list of examples of E&E toys that need to comply with RoHS 2 by 22nd July 2019 to illustrate minor/secondary functions.



Example 1: Toy car with light and sound



Example 2: Plush reindeer singing Christmas corals



Example 3: Doll house with lights

SOLUTION

For details of the directive, you can consult the full text of the directive 2011/65/EU and the [European Commission website](#).

SGS as the world's leader in third party testing has established procedures to cover a large variety of legal requirements related to your products. The global footprint of SGS will provide solutions wherever you are. Our experts may support you in product compliance with RoHS and many more consumer product related requirements.

Please don't hesitate to contact us if you need further information.

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