



Raising standards for consumers



POSITION PAPER

**on the application and effectiveness of
Directive 2009/48/EC on the safety of toys**

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1. Executive summary

According to Article 48 of Directive 2009/48/EC on the safety of toys, by 20 July 2014 and every five years thereafter, Member States have to send to the Commission a report on the application of the Directive.

The Directive specifies that the report should contain an evaluation of the situation concerning the safety of toys and of the effectiveness of the Directive, as well as a presentation of the market surveillance activities performed by that Member State.

The Commission has to draw up and publish a summary of the national reports. For the purposes of drawing up the above national report, the Commission has distributed a questionnaire to Member States.

In the context of the evaluation exercise, stakeholders were also invited to submit their views on any of the issues addressed in the questionnaire.

This position paper contains the views of ANEC concerning the safety of toys and concerning the effectiveness of the Toy Safety Directive.

Although the new Toy Safety Directive, which entered into force in July 2011, certainly brought improvements to toy safety in Europe, ANEC calls upon policy makers to take the health of children more seriously by significantly strengthening the chemical requirements for toys.

It has become clear that the significant shortcomings of the Directive, such as the lack of adequate provisions to exclude exposure to CMR¹ substances generally, and particularly in toys intended for use by children under 36 months or in mouth-actuated toys, can be solved only by a fundamental revision of the chemical requirements of the Directive. Such revision is unavoidable as it is unacceptable that the health of children should be 'played' with further.

Furthermore, ANEC urges that the Toy Safety Directive be amended to regulate impulse noise levels in toys, and to set the limit to what is allowed for adults in industry according to Directive 2003/10 /EEC. We see no safety based reason to expose children to higher levels than is allowed for adults.

Finally, it is important, in the interest of legal certainty, that the Commission introduces specific requirements for visibility and legibility of warnings on toys (e.g. a minimum letter size), in order to enable Member States to enforce these requirements in a uniform way.

¹ Carcinogenic, Mutagenic and/or toxic to Reproduction

2. Background

In June 2009, ANEC welcomed the adoption by the European Parliament and Council of a revised Directive regulating the safety of toys in the EU², particularly bearing in mind that the former Toy Safety Directive³ dated back to 1988.

ANEC especially welcomed the provisions for:

- a better enforcement of the legislation
- Increased visibility and understanding of warnings on toys
- Stricter regulation of toys in food
- Ban of some dangerous chemical substances
- Evaluation of the safety level provided by the new legislation

However, in ANEC's opinion, several shortcomings still remained to be addressed with regard to the new legislation:

- Many dangerous substances would still be allowed in toys
- No flexibility in terms of quickly adapting the legislation to new potential risks
- The noise level of toys is not sufficiently regulated by the new legislation
- The need to improve toy standards

3. Evaluation and effectiveness

3.1 Questionnaire to Member States

According to Article 48 of Directive 2009/48/EC on the safety of toys, by 20 July 2014 and every five years thereafter, Member States have to send to the Commission a report on the application of the Directive.

² Directive 2009/48/EC of the European Parliament and the Council of 18 June 2009 on the safety of toys.

³ Directive 88/378/EEC of 3 May 1988 concerning the safety of toys.

The report should contain an evaluation of the situation concerning the safety of toys and of the effectiveness of the Directive, as well as a presentation of the market surveillance activities performed by that Member State.

The Commission has to draw up and publish a summary of the national reports. For the purposes of drawing up the above national report, the Commission distributed a questionnaire to Member States.

In the context of the evaluation exercise, stakeholders were also invited to submit their views on any of the issues addressed in the questionnaire.

ANEC focussed on the following questions, as we are of the opinion that these are the most important ones from a consumer point of view:

- In which standardisation activities (European & International) on toys did your experts participate? How often? (*question 11*)
- In general, do you consider that the TSD is effective in ensuring the safety of toys and the free movement of toys within the EU? (*question 14*)
- Is the definition sufficiently clear? Has the revised definition included in the 2009 TSD been effective in reducing the “grey area” compared to the situation under the 1988 TSD? What would be the best procedure to deal with products in the “grey area”? (*question 17*)
- Annex I as well Article 2(2) of the TSD lists those products which are outside the scope of the TSD. Do you consider that these exceptions continue to be appropriate? Is there any exception that should be added to or deleted from Annex I (products that are, in particular, not considered to be toys) or Article 2(2) (toys to which the TSD does not apply)? (*question 18*)
- Are there any areas of concern on toy safety that are not covered adequately by the TSD? (*question 22*)
- Is the use of warnings as provided for in Article 11 and Annex V effective? Did the use of warnings, including the language requirements, pose any problem? Is there a need to improve or complete the warnings? (*question 23*)
- Do the particular safety requirements in Annex II need to be adapted, complemented or rephrased? (*question 21*)

3.2 In which standardisation activities (European & international) on toys did your experts participate? How often?

ANEC, Partner Organisation of CEN and CENELEC, actively participated in the European standardisation work on toys:

- CEN TC 52 'Safety of Toys'
- CEN TC 52 WG3 'Safety of Toys: Mechanical and physical properties'
 - o CEN TC 52 WG3 TG 1 – Acoustics
 - o CEN TC 52 WG3 TG 2 – Cords in toys
 - o CEN TC 52 WG3 TG 3 – Projectiles (by correspondence)
 - o CEN TC 52 WG3 TG 4 – Toy books (by correspondence)
 - o CEN TC 52 WG3 TG 5 – Warnings
- CEN TC 52 WG10 'Activity toys' (by correspondence)
- CENELEC TC 61 WG7 'Electric toys' (by correspondence)

ANEC attended most of the meetings of the above committees (except those followed by correspondence) and submitted comments on draft European toy standards and amendments developed by CEN TC 52 WG3 (TGs) and WG10 during the period 2009-2014.

In addition, ANEC also followed the international work of ISO TC 181 'Safety of toys' through Consumers International and submitted comments on some draft international toy standards and amendments during the period 2009-2014.

Unfortunately, there is a general lack of consumer representation in standardization at the international level. In the toy safety area, not even the larger European countries are active at the international level, i.e. Germany, Italy, Spain and France do not participate in ISO TC 181 'Safety of toys'. This means that ISO documents are in general not discussed at national level in many European countries.

At the same time, globalization has become a buzzword also in standardization. Already in the late 1990's the toy sector felt a need to combine the American standard for toys (ASTM F 963) and the European standard for toys (EN 71) into one international standard to make it easier for the industry to export toys to the whole world. This was questioned by consumer organizations at that time as there was a fear that consumers would end up with an ISO standard which would contain the lowest requirements from the two respective standards.

In 2009, ANEC commissioned a study with the following objectives:

- To undertake a peer review of the ICTI Review of Global Toy Safety Standards, including a gap analysis, in order to identify whether further elements are needed to achieve the highest level of safety practicable.
- Further to the peer review, to elaborate general proposals to revise the existing CEN, ISO and ASTM standards in order to develop global standards, taking into account:
 - the revised Toy Safety Directive 2009/48/EC
 - the different foreseeable hazards for children (chemical, mechanical, EMF)
 - the requirements of the standardisation and legislative frameworks for toys, at least in the EU and USA.

The study led to an ANEC position⁴ on the possible streamlining of the legal and standardization frameworks for toy safety. ANEC stressed the conclusion of the study that the convergence of the standards is dependent upon greater coherence of the legislation which governs the production and sale of toys. In achieving a greater coherence of legislation and convergence of standards, ANEC strongly requested that legislators and standardisers adopt requirements that offer consumers only the highest levels of safety possible.

During the past few years, standardization work on toys has been divided between ISO and CEN in order to harmonize as far as possible. Working documents are drafted in one committee and afterwards presented to the other. As there is very little consumer influence at ISO level (hence the work is dominated by industry), the documents presented to CEN contain certain proposals that could relax the present European requirements. However, given the agreement achieved at international level, it is difficult to amend proposals in favour of the consumer interest when they reach CEN.

Finally, when there are divergent opinions on the scientific base for the decisions to be taken in the standards' committee for toys, the manufacturers' view prevails instead of the precautionary principle. This was the case during the development of an amendment on acoustics to the toy standard EN 71-1:2011. The amendment was approved in July 2013 despite opposition from ANEC. The amendment is not giving children adequate protection against hearing impairment caused by impulse noise from toys and was not elaborated according to the precautionary principle. See further explained under point 3.6.3.

3.3 In general, do you consider that the TSD is effective in ensuring the safety of toys and the free movement of toys within the EU?

The TSD certainly brought improvements to toy safety in Europe, e.g. market surveillance authorities were granted increased powers to check whether products

⁴ ANEC position on the possible streamlining of the legal and standardization frameworks for toy safety, <http://www.anec.eu/attachments/ANEC-SG-2010-G-007%20+%20annex.pdf>

on the EU market are safe and specific requirements for the safety of toys in food products were introduced in the legislation.

In addition, comparative testing of toys done by national consumer organizations⁵ showed positive results in relation to mechanical aspects and flammability of toys.

On the other hand, experience shows that warnings on toys are often too small, hidden by other text, hidden under crumples in the packaging, etc. It is sometimes difficult to discover and read the warning(s), also with corrected vision. Therefore, consumers might not detect it and children are not always protected properly. We understood that some authorities have had problems to enforce the presentation of warnings on toys because there are no specified requirements in the Directive and the belonging standards. See further explained below under point 3.7.

Last but not least, the TSD is NOT effective in ensuring the safety of toys and the free movement of toys within the EU as it still permits the use of many dangerous chemicals, such as carcinogenic, allergenic and hormonal disrupting substances, despite the potential risks to children's health. See also below under points 3.6.1 and 3.8.

3.4 Is the definition sufficiently clear? Has the revised definition included in the 2009 TSD been effective in reducing the "grey area" compared to the situation under the 1988 TSD? What would be the best procedure to deal with products in the "grey area"?

The overlap with sports and other recreational equipment (which falls within the scope of CEN TC 136) remains a problem. Examples are (toy) scooters and (toy) trampolines.

Concerning (toy) trampolines it is not sufficiently clear which kind of trampolines are covered by the TSD (e.g. in-ground trampolines, bouncing facilities).

Concerning (toy) scooters, in June 2014, CEN TC 52 'Safety of Toys' sent a letter to the Commission (document CEN TC 52 N1802) regarding the potential overlap in requirements for toy scooters for children over 20 kg and scooters that are sports equipment, in order to highlight the problems that are associated with the classification of scooters. In this respect, we propose a change to Annex I of the TSD. See below under point 3.5.

⁵ December 2012 magazine, Test-Achats (Belgium), Comitato Difesa Consumatori Altroconsumo (Italy), DECO (Portugal) and OCU (Spain)

3.5 Annex I as well Article 2(2) of the TSD lists those products which are outside the scope of the TSD. Do you consider that these exceptions continue to be appropriate? Is there any exception that should be added to or deleted from Annex I (products that are, in particular, not considered to be toys) or Article 2(2) (toys to which the TSD does not apply)?

Concerning scooters, ANEC proposes to delete the 5th para in Annex I and to introduce scooters in the 3rd para, to be in line with similar sports equipment (roller skates, inline skates, skateboards).

Annex I should also indicate which kind of trampolines are not considered as toys.

3.6 Are there any areas of concern on toy safety that are not covered adequately by the TSD?

3.6.1 Many dangerous substances are still allowed in toys

Directive 2009/48/EC still permits the use of many dangerous chemicals, such as carcinogenic, allergenic and hormonal disrupting substances, despite the potential risks to children's health. During the revision of Directive 88/378/EEC, ANEC and BEUC⁶ repeatedly expressed strong concerns about the inadequate chemical requirements proposed by the Commission. Directive 2009/48/EC was adopted in 2009 after 8 years of discussion. The insufficient chemical requirements entered into force only in July 2013.

As a result of the growing criticism from various stakeholders, including ANEC, as well as several Member States, the Commission established a working group on chemicals in toys (formally a subgroup of the Commission's Expert Group on Toy Safety) with the aim to make proposals within the legal framework for improving the chemical requirements of the Directive. The Directive includes a limited Comitology procedure which allows to change the limits for allergenic fragrances and elements (points 11 and 13 of Part III of Annex II), and to "adopt specific limit values for chemicals used in toys intended for use by children under 36 months or in other toys intended to be placed in the mouth" according to its article 46. This subgroup - with ANEC participation - first met in November 2010.

On the occasion of its second anniversary, ANEC and BEUC published a position paper entitled "EU Subgroup on chemicals in toys fails its mission"⁷ which presented a critical review of the results of two years of discussions. ANEC and BEUC concluded that very little progress had been made (apart from an

⁶ The European Consumer Organisation

⁷ <http://www.anec.eu/attachments/ANEC-CHILD-2012-G-094final.pdf>

insignificant reduction of the cadmium limits; a similarly insignificant reduction of the barium limits was in the pipeline at the time) and that as a result, the subgroup had failed its mission to protect children from dangerous chemical substances in toys, as most problems remained unsolved. This was not meant to blame the members of the group who did their best to make progress; rather it is a critique of its structural and organisational constraints. The process is too slow and must be significantly accelerated.

Meanwhile another 2½ years have passed and the situation has not changed much. The envisaged reduction of the limits for lead by a factor of about 7, based on an EFSA opinion, is still pending. The chemicals group had suggested the lowering of the limits already in January 2011. However, as a result of industry objections, the Commission decided to go for an impact assessment which strongly delayed the process. The EC presented the first working document on lead to the May 2014 meeting of the Expert Group on the Safety of Toys. ANEC concurred with the EC that the Toy Safety Directive (TSD) gives clear and obligatory directions to establish limits for certain metals - including lead - at a limit of 50% of whatever any EC Scientific Committee finds appropriate. As Scientific Committees have found a limit of 10% acceptable for lead in products for children, 5% must be used, as proposed by the EC. In a position paper⁸ from 2012, ANEC and BEUC called for a massive reduction of current limit values for lead in toys by a factor of 7 based on a 5% allocation.

Apart from that, there are only a few other items for which measures have been proposed: limits for certain flame retardants (TCEP, TCPP and TDCP) and for bisphenol A used in toys intended for use by children under 36 months, or in other toys intended to be placed in the mouth, based on article 46(2). Some further restrictions are in discussion e.g. for the preservative kathon (a strong sensitizer), for phenol and for emissions of formamide from puzzle mats.

There are, of course, several REACH restrictions applicable to toys (e.g. on phthalates or PAHs), but much more needs to be done to protect children adequately.

3.6.2 Visibility and understanding of warnings on toys

See below under point 3.7.

⁸ ANEC/BEUC position on reducing children's exposure to lead from toys, <http://www.anec.eu/attachments/ANEC-CHILD-2012-G-081.pdf>

3.6.3 The noise level of toys is not sufficiently regulated by the new legislation

The TSD states that toys which emit sound should not pose any hearing impairment risk to children. Unfortunately there is no maximum safety level of sound (in decibels) for sound-emitting toys in the legislation.

An amendment on acoustics to the toy standard EN 71-1:2011 was approved in July 2013 despite opposition from ANEC.

For impulse noise, which can give immediate and irreversible damage to hearing, the research presented in the proposal in order to justify higher levels than allowed for adults, according to the EU workplace legislation, is scientifically too vague. The maximum limit for cap firing toys, 125 dB L_p C *peak* at 50 cm distance, corresponds to 151 dB measured at the ear. This exceeds with 14 dB what is allowed for adults in workplaces according to the so called Noise Directive 2003/10 /EEC. During the discussions, the evidence brought forward by the toy industry (and experts commissioned by them) that the higher levels might be harmless was challenged by the Swedish expert Prof Stig Arlinger (commissioned by the Swedish Consumer Agency). In a case like this - when experts have different opinions on the hazard or risk - the precautionary principle should be used and the most restrictive limit prescribed in the standard.

ANEC urges that the Toy Safety Directive be amended to regulate noise levels in toys, and to set the limit to what is allowed for adults in industry according to Directive 2003/10 /EEC, namely 110 dB L_p C *peak* at 50 cm distance. We see no safety based reason to expose children to higher levels than is allowed for adults.

For continuous noise, instead of proposing levels for which it is known that there is no risk for permanent damage to the human ear, independently of the duration of exposure, the amendment is based on risk assessments which depend on assumptions of average exposure times, average or "typical" duration of play. Children's playing behaviour can vary and is not known in each individual case. Despite strong opposition from ANEC, the levels for close to the ear toys have been increased from 5dB to 16 dB compared to the preceding standard.

The amendment is in our opinion not in accordance with the intention of recital 27 of the TSD, nor with the provisions of mandate M/445. It is not giving children adequate protection against hearing impairment caused by noise from toys and has not been elaborated according to the precautionary principle.

3.6.4 No flexibility in terms of quickly adapting the legislation to new potential risks

The TSD does not foresee any specific procedure to allow for the easy and flexible modification of the Directive in response to market changes (e.g. new toys) or new risks. Such a procedure would avoid the protracted legislative process of co-

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decision or an exclusive reliance on standards procedures. In practice, the procedure could be used for example to 1) modify the scope of the Directive; 2) identify toys for which third-party testing is necessary; 3) ban certain dangerous toys or set limit values for chemicals in toys or a speed limit for toys that are not self-propelled. The Toy Safety Directive includes a restricted committee procedure for only certain purposes⁹.

3.7 Is the use of warnings as provided for in Article 11 and Annex V effective? Did the use of warnings, including the language requirements, pose any problem? Is there a need to improve or complete the warnings?

A number of warnings to be used on toys are presented in Annex V of the Toy Safety Directive 2009/48/EC (TSD).

Toys shall be safe by design, but toys that are safe to be used by one age group can be dangerous to be used by another age group. For example, it is not possible to totally forbid the selling of toys that contain small parts or small balls (choking hazard). Instead, small parts/balls are forbidden in toys intended for children under three years (who tend to put everything in the mouth) but allowed for toys intended for children over three years. Consequently, there should be a warning on toys not intended for children under three that contain small parts/balls.

Warnings on toys are therefore very important to consumers. But can the warning(s) be easily seen and read by the parent or caregiver?

Experience shows that warnings on toys are often too small, hidden by other text, hidden under crumples in the packaging, etc. It is sometimes difficult to discover and read the warning(s), also with corrected vision. Therefore, consumers might not detect it and children are not always protected properly.

We understood that some authorities have had problems to enforce the presentation of warnings on toys because there are no specified requirements in the Directive and the belonging standards, like e.g. a minimum letter size. This creates a lot of confusion on the market. A concrete letter size is only defined in the explanatory guidance document.

Article 11 of the TSD states that toy manufacturers shall mark warnings on toys in a clearly visible, easily legible, understandable and accurate way.

⁹ e.g. to establish limits for toys intended to be used by children up to 3 years of age or intended to be placed in the mouth, elements or fragrances

In 2008, during the revision of the 'old' Toy Safety Directive from 1988, ANEC and BEUC asked for stricter requirements for warnings in the Toy Safety Directive (see <http://www.anec.eu/attachments/ANEC-CHILD-2008-G-010final.pdf>) and published in this respect the booklet "Toys: find (and understand) the warnings!" (see <http://www.anec.eu/attachments/ANEC-CHILD-2008-G-063.pdf>). The booklet contained examples of toys that were labelled with insufficient or incorrect warnings.

An amendment to the toy safety standard EN-71-1:2011 for the presentation of warnings on toys has recently been drawn up. This amendment (A1) on warnings was published on 12 March 2014 with the consolidated version of EN 71-1:2011 + A3:2014.

The ANEC booklet was used as a base for the amendment on warnings to the toy safety standard EN 71-1:2011. During the discussions, it was agreed that these 'bad' examples were not acceptable and should be avoided by the standard.

The amendment to the standard however contains no specifying requirements on how to improve the presentation of warnings, there is only advice in the informative part of the standard, the rationale. The rationale is voluntary, not normative. There are for example no requirements on minimum sizes of letters.

The question is if this advice is enough in order to improve warnings on toys sold on the European market, and if it is legally sufficient in order for market surveillance authorities to control and to prosecute in court if the presentation of warnings is deficient. It is important, in the interest of legal certainty, that Member States have normative criteria at their disposal of how to enforce the requirements for visibility and legibility of warnings on toys.

3.8 Do the particular safety requirements in Annex II need to be adapted, complemented or rephrased?

It has become clear that the significant shortcomings of the Directive, like the lack of a generic ban of CMR substances in toys intended for use by children under 36 months, or in mouth-actuated toys based on a low limit of detection, can be solved only by a fundamental revision of the chemical requirements of Directive 2009/48/EC.

In June 2014, ANEC published the [Position paper 'Hazardous chemicals in products - The need for enhanced EU regulations'](#). Starting from the need for a systematic approach to chemicals in products to be developed, the paper proposes that overarching principles be established to cover all types of products, with product specific requirements being elaborated as well as provisions on monitoring and market surveillance. The paper prioritises actions and the identification of requirements for several product groups.

For toys, the ANEC paper makes the following suggestions:

- Requirements for CMR substances shall be significantly strengthened to protect children's health. Current limits are based on high thresholds which are based on the rules for classification of mixtures according to Regulation 1272/2008/EC on classification, labelling and packaging of substances and mixtures (CLP) allowing e.g. up to 1% of a category 2 carcinogen or up to 3% of a category 2 substance toxic for reproduction. At a minimum the generic content based CMR limits should be reduced to 0,01% with stricter limits for certain CMR substances where required.
- An even stricter approach shall be followed for CMR substances in toys intended for use by children under 36 months, or in other toys intended to be placed in the mouth, eliminating such substances entirely using a low level of detection of 0,01 mg/kg (10 ppb) based on a dynamic migration test (head-over-heels), such as the one contained in EN 71-10 (to be modified). Equivalent approaches shall be used for volatile CMR substances and the dermal contact route.
- The recently adopted limits for PAHs in REACH (entry 50 of Annex XVII) shall be reduced as regards toys and child use and care articles from 0,5 mg/kg to 0,1 mg/kg.
- In the long run an approval system (positive list system) shall be established for toys' materials intended for use by children under 36 months, or in other toys intended to be placed in the mouth based on current legislation in the field of food contact materials.
- Only non-allergenic fragrances shall be used in toys. Requirements for allergenic fragrances need to be considerably strengthened taking into account among other the opinion by SCCS concerning "Fragrance allergens in cosmetic products", adopted in June 2012¹⁰, which stated that many more fragrance substances than those identified in the SCCNFP opinion of 1999 (on which the respective provisions of the Cosmetics Regulation are based, and which formed the basis of the TSD requirements) have been shown to be sensitizers in humans.
- Sensitizers other than allergenic fragrances shall be addressed.
- Some of the limits for elements have to be reviewed and adapted. In particular, the lead limits shall be reduced to 2.0 mg/kg for dry material, to 0.5 mg/kg for liquid material and 23 mg/kg for scraped-off material without

¹⁰ Scientific Committee on Consumer Safety: Opinion on fragrance allergens in cosmetic products, June 2012, SCCS/1459/11.

exemptions. It should be recalled that point 22 of the preamble to the TSD requests limits for arsenic, cadmium, chromium VI, lead, mercury and organic tin at levels that are half of those considered safe according to the criteria of the relevant Scientific Committee.

- Migration limits in the TSD for nitrosamines and nitrosatable substances in toys intended for use by children under 36 months, or in other toys intended to be placed in the mouth (0,05 mg/kg for nitrosamines and 1 mg/kg for nitrosatable substances), are inadequate as the Commission itself has admitted in its response to the German request to maintain the more stringent national values of 0,01 mg/kg and, respectively, 0,1 mg/kg). Hence, the limits shall be reduced.
- Endocrine disrupting chemicals (EDCs) shall be addressed in toys. For the time being a product specific approach to tackle EDCs in toys is urgently needed. Once a harmonised classification for EDCs is available, the classes of EDCs which are of particular concern shall be eliminated.
- Biocides used in toys were exempted from the authorization requirement for biocides when the Regulation "concerning the making available on the market and use of biocidal products" (No 528/2012) was approved. This means that biocides used in toys do not need to be authorized. This is a serious omission. Either an approval system for biocides shall be introduced in the TSD, or the exemption for toys in the biocidal products regulation shall be removed.
- Chemicals falling in other classes of dangerous substances such as "very toxic", "toxic", "harmful", "corrosive", "irritant" or non-classified (or not yet classified) substances which pose health hazards shall be covered.
- Specific requirements shall be established for additional substances such as formaldehyde, plasticizers, flame retardants, colourants, monomers, solvents, etc. using EN 71-9 'Safety of Toys – Part 9: Organic Chemical Compounds Requirements' as a starting point.
- Nanomaterials shall not be used in toys unless endorsed by a scientific committee.
- Persistent, bio-accumulative and toxic chemicals (PBT), as well as very toxic and very bio-accumulative (vPvB) chemicals, are substances of very high concern and shall be prohibited.
- Deviations from the above suggested rules shall be possible based on an assessment by a scientific committee.
- The Directive shall include a procedure (such as Delegated Acts) which allows the adoption or modification of limits for chemicals in all kinds of toys for all

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kinds of substances including generic limits for groups of substances in a fast and flexible way (without having to change the whole piece of legislation in the European Parliament and the Council).

- Sufficient resources shall be made available by the Commission and the Member States to systematically identify, assess and regulate chemicals in toys. The Commission shall provide an annual working plan for the systematic evaluation.

END

About ANEC

ANEC is the European consumer voice in standardisation, defending consumer interests in the processes of technical standardisation and conformity assessment, as well as related legislation and public policies.

ANEC was established in 1995 as an international non-profit association under Belgian law and is open to the representation of national consumer organisations in 33 countries.

ANEC is funded by the European Union and EFTA, with national consumer organisations contributing in kind. Its Secretariat is based in Brussels.



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