

TÜV Rheinland LGA Products – Information

June 2021

Toy Safety Directive 2009/48/EC: Harmonization of current versions of the toy safety standards EN 71-7, EN 71-12 & EN IEC 62115

Harmonized Standards as Presumption of Conformity with the Directive

The Toy Safety Directive sets up a lot of general safety requirements which are further specified in official standards that have been published by the European Committee for Standardization CEN. According to article 13, for the presumption of conformity with the requirements set out in Article 10 and Annex II it is necessary for the toy be in conformity with harmonized standards, the references of which have been published in the Official Journal of the European Union.

The list of standards is updated from time to time to include each the latest version in the course of adaptation to technical progress. There will be a transition period within this the previously referenced version and the new version may be applied in parallel as the basis for conformity. For outdated standards referenced in previous versions, a date of withdrawal is defined.

On May 28, 2021, the European Commission has adopted [COMMISSION IMPLEMENTING DECISION \(EU\) 2021/867 on harmonized standards for toys drafted in support of Directive 2009/48/EC](#) as the latest update. It implements the current versions of EN 71-7, EN 71-12 and EN IEC 62115. All other standards cited remained unchanged. This decision entered into force immediately on the day of its publication in the OJEU on May 31, 2021. Implementing Decision (EU) 2019/1728 is repealed.

Table 1 - Summary of Adaptations (valid from May 31, 2021)

<i>Title of the standard</i>	<i>New referenced Version(s)</i>	<i>Transition period until</i>
Safety of toys — Part 7: Finger paints - Requirements and test methods	EN 71-7:2014+A3:2020	November 28, 2021
Safety of toys — Part 12: N-Nitrosamines and N-nitrosatable substances	EN 71-12:2016 <i>Restriction regarding point a) of Table 2 of clause 4.2</i>	November 28, 2021
Electric toys — Safety	EN IEC 62115:2020 EN IEC 62115:2020/A11:2020	February 21, 2022

You can also find the [summary list of the harmonized standards](#) on the website of the European Commission in the DocsRoom.

Safety of toys - Part 7: Finger paints – Requirements and test methods

EN 71-7:2014+A2:2018 will be superseded by [EN 71-7:2014+A3:2020](#). Essential adaptation is the inclusion of the lowered limit for preservative Climbazole in the standard. Previously, this demand has been implemented by a restriction note in the last version of the OJEU. Apart from this only minor corrections have been done. Details can be found in our customer information “EN 71 part 7: Finger paints – Requirements and test methods: Third amendment published in April 2020”.

The changes do not trigger new testing or evaluation as the adjusted requirements for Climbazole already had to be fulfilled.

Safety of toys - Part 12: N-Nitrosamines and N-nitrosatable substances

After a long time, the EU Commission has finally decided to replace EN 71-12:2013 with [EN 71-12:2016](#). EN 71-12:2016 represents the current state of the art with regard to analytics as the limit of quantification (LOQ) for N-nitrosamines could be significantly reduced and adaptation of the testing procedure for elastomers (sampling and migration) leads to a more uniform application of the test method. Nevertheless, EN 71-12:2016 introduced lower limit values for a certain kind of product type which go beyond the requirements set out in the current version of the Toy Safety Directive 2009/48/EC. Given that the limit values set in Directive 2009/48/EC are the limit values to be complied with, it has been necessary to add an informative note in the with regard to the publication of the standard EN 71-12:2016. In the summary list, a “restriction” has been added which excludes the disputed part of EN 71-12:2016 and enacts the limits of the Directive instead.

Table 2 – Differing requirements for “elastomeric materials in toys intended for use by children under 36 months and intended or likely to be placed into the mouth”:

<i>Legal Reference</i>	<i>N-nitrosamines</i>	<i>N-nitrosatable substances</i>
DIR 2009/48/EC Annex II Part III point 8	0.05 mg/kg	1 mg/kg
EN 71-12:2016 clause 4.2 table 2 point a)	0.01 mg/kg	0.1 mg/kg

However, the more stringent limit values of EN 71-12 for finger paints (introduced with EN 71-12:2013) compared to the Directive remain unchanged. Likewise, all other contents of EN 71-12:2016 have been fully recognised in the course of harmonization.

Details about the adaptation of the standard can be found in our customer information “Customer information 01/2018 - Chemical Requirements for Toys – Current Developments”. The changes in the analytical procedure (test of uncut materials and separation of elastomeric parts e.g. from textiles) might cause different test results. As a consequence, toy samples tested according to the old version might be necessary to be retested according to EN 71-12:2016.

EN IEC 62115: Electric toys - Safety

Two new standards [EN IEC 62115:2020](#) and [EN IEC 62115:2020/A11:2020](#) will replace six older standards (EN 62115:2005, EN 62115:2005/A11:2012, EN 62115:2005/A11:2012/AC:2013, EN 62115:2005/A12:2015, EN 62115:2005/A2:2011 and EN 62115:2005/A2:2011/AC:2011). Significant changes have been made in several sections: 5.2 Preconditioning, 7.2.3 Transformer Toys and Power Supply Toys, 7.3.3 Electric Toys that are used with replaceable Batteries, 7.5 Instructions for ride-on electric Toys, 9.8 Abnormal Supply via a USB Connection, 12 Mechanical Strength, 13.4.1 Small Batteries, 13.4.4 Electric Toys placed above a Child, 13.4.6. Battery Compartment Fasteners, 13.10 Speed Limitation of ride-on electric Toys, 15.5 Batteries, 16.1 Fixings, 19.2 Optical Radiation and Annex A - 7.3.4 Experimental Sets. Details can be found in our customer information "EN IEC 62115:2020: New version of safety standard for electrical toys".

Electrical toys will have to be re-evaluated and at least partially re-tested. Difficulties could occur especially for the torque of the battery compartment screws with outer thread diameter of < 2.8 mm (16.1) as well as for the evidence/certificates or partial test for supplied batteries/rechargeable batteries (15).

Outlook

Further updated standards are due for harmonization in the near future: EN 71-2:2020, EN 71-4:2020, EN 71-3:2019+A1:2021 as well as EN 71-13:2021. They have not been integrated into the list yet, probably due to the reason that the national implementation period is still running. In this regard, the European Commission has indicated that they will be taken into account in the next update in August 2021.

Further technical information:

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