



Implications of the New Toy Directive (2009/48/EC) Cleaning of Toys Intended for Children Under 36 Months

Pursuant to our Sparkle on the general overview of the New Toy Directive, there will be a new legal requirement for all toys intended for children under 36 months for products first placed on the European market from 20 July 2011.

The Challenge:

A toy intended for use by children under 36 months must be designed and manufactured in such a way that it can be cleaned. A textile toy shall, to this end, be washable, except if it contains a mechanism that may be damaged if soaked. The toy shall fulfill the safety requirements also after having been cleaned in accordance with this point and the manufacturer's instructions.

This means that all toys for this age must be capable of being cleaned. The method of cleaning is not defined except for textile toys which must be washable, unless it contains a mechanism that may be damaged by being soaked.

Guidance published by the European Commission has defined textile toys as "... toys entirely made of textile with exception for materials inside the toy and minor features or decorations sewed/adhered to the outside (e.g. eyes and nose). They can have a mechanical non textile component (mechanism) on the inside." Textile toys would therefore include soft plush toys and disguise costumes for children under 36 months. Additional examples can be found in the guidance document. Furthermore the guidance makes it clear that "Soak washing means immersing the toy in water or other liquid; this handling does not necessarily imply machine washing, it can be hand wash."

The manufacturer shall also carry out an analysis of all hazards mentioned in Article 18 after cleaning, among them hygiene hazards as well as an assessment of the potential exposure to all such hazards. For example, small parts hazards that appear after cleaning or soak washing need to be assessed.

As part of the Safety Assessment that a manufacturer is obliged to carry out under Article 18, consideration should be given as to what safety aspects may be compromised after washing. Relevant testing can then be carried out after washing to assess this if appropriate.

The Solution:

Intertek, through our extensive global network, has a variety of services available to help you overcome the challenges related to complying with the new directive. Besides keeping you updated on any new developments from time to time, Intertek provides legal, regulatory and strategic consulting, testing, and implementation programs for compliance to the new directive, enabling you to meet your business objectives.

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