



Fact and fiction: Myths and misleading statements about toy safety

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Misleading statements and fiction about toy safety are often communicated to the general public. The public must have access to the facts, so that they can make informed decisions about purchasing safe toys for their children. We want to debunk common toy safety myths and provide the public with the facts.

Myth: Many toys on the European market are not safe

Reality: Consumers can be confident that toys sold in Europe have to meet the highest safety standards. Reputable manufacturers are committed to guaranteeing the safety of the toys they produce. However, market surveillance remains important to stop rogue traders who pay little attention to safety from putting inferior products on the market. Parents can help their children to play safely by always buying good quality toys from trustworthy retailers, selecting appropriate toys, making sure they are used as intended, supervising play, and keeping young children away from toys that are intended for older children.

Myth: The new Toy Safety Directive is less strict than the old Directive

Reality: Consumers can rest assured that all good quality toys sold in Europe are safe for children to play with. European toy safety legislation is the strictest in the world. Many of the changes introduced by the new Directive affect industry but do not actually introduce a tangible difference to children's safety as there was already a huge safety margin built into toy requirements.

Not only do some manufacturers need to adapt their production processes to take into account the new legislation, but even those manufacturers that do not need to make changes now need to *prove* the safety of their toys in a safety file. This documentation needs to be kept on record and available for the authorities for ten years after the last toy of this kind has been put onto the market.

Myth: The German government is correct in wanting to revert to the old Directive's approach to dangerous substances

Reality: Amongst other things, the new Directive takes a more sophisticated scientific approach to chemicals. While the old Directive contained limits for eight substances, the new Directive sets limits for 19 elements and takes into account how a child interacts with the material during play. The new Directive differentiates between toy materials that a child has close contact with, for example finger paints, and those with which the child has less contact, such as solid materials. In the new Directive, the number of limits increases from 8 to 57. Of the 57 limits in the new Directive, 53 are more stringent than those in the old Directive. The remaining four limits were slightly relaxed based on scientific evidence as well as research into the child's interaction with the toy.

Myth: Toys made in Europe are safer than toys made in China

Reality: *Where* toys are manufactured is not important. The same rules apply to all toys placed on the EU market, regardless of where they are manufactured. If the toy is manufactured outside the EU, the

importer together with the manufacturer must ensure it meets all safety requirements. All good quality toys sold in Europe today are safe, regardless of where they are made.

Myth: Toys contain dangerous chemicals

Reality: Toys sold in the EU are not allowed to contain substances that are dangerous and to which children might be exposed. Few people realise how strict the rules are for toys: did you know a plastic toy fork for a doll has stricter rules than a real plastic fork a child uses?

Just because a toy may contain a certain substance does not mean that the child will be exposed to that substance. As long as there is no exposure to a hazard, there is no risk. For example, a rattle for a young child contains a number of small parts that make a noise when a child shakes it. Such small parts are a hazard because a young child could very easily choke on them. But the small parts are not accessible so there is no risk because there is no exposure. The same can be said for the material the rattle is made of as it does not allow exposure to the ingredients (it is inert).

Toy manufacturers choose certain substances because of their safety characteristics. For example, some substances make products tougher and more shatter resistant. This ensures that toys can withstand the rigors of children's play. We recognise the special responsibility we have towards children. We have a long safety record and invest large amounts in R&D to ensure the safety of our products. Responsible toy manufacturers do not use any materials that do not meet the strict EU safety requirements.

Myth: Toy manufacturers sometimes use chemicals about which little is known and which may be dangerous

Reality: All substances that reputable toy manufacturers use are safe for use in toys and are often used because of their safety characteristics. We have a long safety record and continue to invest large amounts in R&D to ensure the safety of our products and to make sure there is no health risk linked to the chemicals used.

Myth: The toy industry is keen to increase profits at the expense of children's safety

Reality: Safety is the European toy industry's top priority. Maintaining a high level of safety is non-negotiable for the reputation and survival of toy companies. Toy companies invest a huge amount of resources and effort in ensuring the safety of their products.

Myth: If a toy smells, it is dangerous

Reality: The fact that a toy smells does not mean that it is dangerous. The same applies for all products. Toys sold in the EU are not allowed to contain substances that are dangerous and to which children might be exposed.

Myth: Toy manufacturers add fragrances to toys to mask the smell of chemicals

Reality: This is incorrect. When fragrances are used in toys, toy manufacturers make sure they are used safely. We use the same fragrances that are used in foodstuffs such as ice-cream and yoghurts. Fragrances are only used in a few toys. These range from play cosmetics to scenting plastic in a doll. Fragrances are used to enhance children's play experience and to meet consumer demand in many cases.

Myth: A high percentage of tested toys are dangerous and do not comply with toy safety rules

Reality: We welcome all debate that could contribute to improved toy safety. However, we are concerned that parents and consumers are being wrongly worried by organisations that take advantage

of the high visibility of toys (particularly in the pre-Christmas period) and the opportunities they offer for media coverage. These organisations often test against restrictions different to those set by EU legislation. The EU rules were agreed by leading European scientists and decision makers. Such organisations often claim that toys that meet all EU safety requirements are not safe. This unnecessary scaremongering creates confusion and misleads the public.

Myth: The number of RAPEX notifications show that toys are more dangerous and less compliant than other products

Reality: The authorities pay a lot of attention to toys due to the vulnerable nature of their user group (i.e. children). The number of notifications is a reflection of the high level of scrutiny of toys due to the sensitive nature of child safety, and the very low tolerance of risk. The number of toys notified on RAPEX is by no means an indication that toys are unsafe. If other categories of consumer products received the same level of scrutiny as toys, their number of RAPEX notifications would increase manifold.

Myth: Coloured materials in toys are dangerous

Reality: The toy industry only uses colourants that are perfectly safe. Colours are used in toys to enhance children's play experience.

Myth: Soft plastic toys should be avoided because of the chemicals they contain

Reality: Not all plasticisers, including phthalates, which are used to soften plastic, are carcinogenic. The toy sector banned the use of carcinogenic phthalates many years ago. We only use perfectly safe alternatives to make plastic toys soft.

Myth: The CE marking does not guarantee toy safety

Reality: The CE marking is intended for market surveillance authorities. It is a declaration by the manufacturer that it complies with the relevant European legislation and that all safety standards and procedures have been respected. The company placing a toy on the market is held accountable and can face legal action/prosecution if the CE marking is incorrectly applied. The credibility of the CE marking can only be guaranteed by strong market surveillance.

Myth: You should only buy toys that have a stamp from a third party testing house

Reality: It is not necessary for toys to be tested by an external lab. Toys are subjected to a lot of testing by laboratories, which can be either in-house or external. It is in the companies' best interest to guarantee the quality and safety of their products.

Myth: It is possible to create toys without chemicals

Reality: Everything in this world is chemical, for example H₂O, the formula for water, is composed of hydrogen and oxygen. We cannot live without chemicals. Some chemicals naturally occur in the environment or in raw materials and others are used when manufacturing products because of the safety properties they impart. For example, the use of certain substances ensures that your child's bicycle helmet is shatter resistant and offer sufficient protection if he/she falls off the bike. A world without chemicals is not possible.

Myth: Toys placed on the market before the new chemical rules of the Toy Safety Directive came into force on 20 July 2013 are less safe than those placed on the market after this date

Reality: This is not true. Toys are manufactured with a very large margin of safety. The margin of safety for toys was and remains substantial. The toy safety rules in the old Directive already contained a large margin of safety. This margin of safety increases in the new Directive, which takes a more sophisticated



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approach to safety. Take a car for example: while the rules for car safety are constantly changing, we do not get rid of old cars each time the rules change. This is normal procedure. They are still safe to drive in as the safety requirements already contain a significant safety margin. The same applies for toys.