



Warnings in EN 71-1:2011

6 June 2011

The new version of the standard for mechanical and physical properties, EN 71-1:2011, will be published this month. The new standard supports the requirements of the new Toy Safety Directive 2009/48/EC. Both the new standard and the new Directive will apply after 20 July 2011. Previous versions of EN 71-1 will not give presumption of conformity to the new Directive.

Some of the requirements relating to warnings have been changed or clarified in EN 71-1:2011. Below follows a summary of the warning requirements in the revised standard.

General requirements for warnings

A toy shall not bear a warning that conflicts with the intended use of the toy, as determined by virtue of its function, dimension and characteristics. This means, for example, that a soft-filled toy shall not carry a warning stating “not suitable for children under 3 years”, since a soft-filled toy is perceived as intended for children under 3 years due to its characteristics, etc.

The manufacturer shall mark the warnings in a clearly visible, easily legible and understandable and accurate manner. These requirements are intended to ensure that parents and supervisors shall be able to read the warnings and comprehend them. The revised standard prevents the use of very small text, text on material that wrinkles easily, etc.

Manufacturers and importers must ensure that the toy is accompanied by instructions and safety information in a language or languages easily understood by consumers, as determined by the Member State concerned. This requirement leads to the notion that information text should use simple and clear language and avoid jargon and that warnings and any safety information must be in an official language of the country in which the toy is sold.

Small toys that are sold without packaging (for example from a display box or from a vending machine) shall have the appropriate warnings affixed to them. In some cases it may be necessary to affix an adhesive label to such toys; in other cases it may be appropriate to provide the packaging separately, marked with the appropriate warning texts, such that the consumer can place the small toys in that packaging before the purchase.

Warnings which determine the decision to purchase the toy shall appear on the consumer packaging or be otherwise clearly visible to the consumer before the purchase. Examples of such warnings are those specifying a minimum or maximum age. The requirement also applies in cases where the purchase is made online (e.g. internet) or by catalogue or by other means where the buyer does not have access to the toy at the time of purchase.

The age warning: “Warning. Not suitable for children under 3 years”

Toys intended for children over three years, and that can be dangerous for children under three years must be accompanied by a warning that is preceded by the word “Warning”. For example:

“Warning. Not suitable for children under three years.”

The age warning shall be clearly legible at the point of sale of the product and shall appear either on the toy itself or on its packaging.

The text “Not suitable for children under three years.” can be replaced by the age warning symbol below which has to be at least 10 mm in diameter. The background must be white, the text “0-3” and the face shall be black, and the circle and line through it shall be red. The symbol shall be accompanied by the word “Warning”, e.g.:



Provided that the packaging already carries a compliant age warning in text (preceded by the word “Warning”), an age warning pictogram in another location on the packaging is considered to be additional information and does therefore not need to be preceded by the word “Warning”.

If several warnings are present on the toy/packaging in the same location, instead of repeating the word “Warning” before each warning, the word “Warnings” may be used once.

The age warning (text or symbol) shall come together with a brief indication of the specific hazard calling for the restriction and the harm that this can lead to. The indication of the hazard/harm can be given either in direct connection with the age warning/symbol (on the toy or the packaging), or on a leaflet or in the instructions for use. The hazard is the potential source of harm (small parts, long cord, etc.) and the harm means physical injury or any other damage to health (choking, strangulation, etc.). In the case of “small parts”, it is considered sufficient to indicate the hazard alone. Examples of complete warning texts are:

- “Warning. Not suitable for children under 36 months. Small parts.”
- “Warning. Not suitable for children under 36 months. Long cord. Strangulation hazard.”

When more than one hazard is present, at least one of the principal hazards shall be indicated.

Other warnings

EN 71-1:2011 specifies about twenty additional warnings to be used when applicable. In some cases, the standard specifies that both the toy and its packaging have to carry the warning, while in other cases, it is sufficient if the instructions for use draw attention to the hazard.

The following warnings are new:

- “Warning. Not suitable for children under 18 months. Long cord/Long chain. Strangulation hazard.” This warning must be present on toys intended for children of 18 months and over, but under 36 months, and having:
 - cords or chains with a length exceeding 220 mm (which do not separate into one or more parts with a length not exceeding 220 mm) that can form a tangled loop or a noose
 - a fixed loop that separates into one or more parts with a length exceeding 220 mm
- “Warning. Long cable. Strangulation hazard.” This warning must be present on toys intended for children under 36 months if the toy has electrical cables (attached or supplied) longer than 300 mm (e.g. for connecting a toy to electronic equipment which might not be a toy).
- “Warning. Protective equipment should be worn. Not to be used in traffic.” This warning must be present on electrically driven ride-on toys. In addition, a warning shall be present that draws attention to the potential hazards of using the toy in areas other than private grounds. Finally, a warning shall be present indicating the suitable age group (depending on the maximum speed of the toy).
- “Warning. This toy has no brake.” This warning must be present on ride-on toys without a braking device.

The following warnings have been changed:

- Toy scooters and roller skates, inline skates and skateboards: “Warning. Protective equipment should be worn. Not to be used in traffic. 20 kg max.” (or “50 kg max.”)
- Toy bicycles: “Warning. Protective equipment should be worn. Not to be used in traffic.”
- Toys intended to be strung across a cradle, cot, or perambulator: “Warning. To prevent possible injury by entanglement, remove this toy when the child starts trying to get up on its hands and knees in a crawling position.”
- Aquatic toys: “Warning. Only to be used in water in which the child is within its depth and under adult supervision.”
- Finally, EN 71-1:2011 contains a new note relating to toys contained in, or co-mingled with food. This note references the new Toy Safety Directive requirement for the outer



Toy Industries of Europe

packaging of the food to bear the following warning: “Warning. Toy inside. Adult Supervision recommended”.

About TIE

Toy Industries of Europe (TIE) is the trade association for the European toy industry, which comprises over 25% of the total world toy market. The toy industry is highly international and is one of the most dynamic business sectors in Europe. Around 80% of the sector is composed of small and medium sized enterprises (SMEs) which have less than 50 employees. Members of TIE include corporate companies as well as national associations from Bulgaria, France, Germany, Italy, the Netherlands, Spain, Sweden, the UK and the Nordic region. TIE membership is open to both corporate companies with a presence in Europe and national associations from European Union Member States (including candidate countries).

The information in this article is not exhaustive. Toy Industries of Europe (TIE) does not assume any responsibility or liability for the accuracy or completeness of this article. Although we do our best to provide accurate information, toy safety requirements are subject to changes, and we therefore recommend that you consult the latest available information.