

Eurasian Economic Commission's draft amendment n° 3 of EEC Technical Regulation on "Safety of Toys (TR TS 008/2011) CEN's comments

Introduction

CEN notes the proposed changes to the Technical Regulation "On the Safety of Toys" TR CU 008/2011" introduced by the Eurasian Economic Commission (EEC) in its draft amendment n° 3, including the proposal to lift the ban on surface coating of rattles and toys that contact the mouth of the child, and the clarification of different requirements and marking rules.

However, there appears to be room for additional alignment on technical requirements e.g. with those in the EN 71 'Safety of Toys series of European standards', thus bringing the EEC Technical Regulation and the equivalent European legislation and European and international standards on toy safety closer together.

CEN comments

An important point of misalignment is the ban on using recycled content in toys which is maintained in Article 4.2.3. of the draft amendment. The reasons for CEN's position on this misalignment are the following:

- The principle in other parts of the world, including the EU, is that all materials used in toys must comply with e.g. chemical requirements, regardless if they are virgin materials or recycled materials. There is no need to treat recycled and virgin materials in different ways – the safety requirements are the same.
- There is in general high focus on increasing circularity in the economy e.g. by using recycled, but chemically safe, materials to produce new products including toys. At the same time, it is critical that that all toys comply with strict chemical requirements regardless of the origin of the materials of which they are made. Since sections 4 and 5 of Annex 2 of the CU TR 008/2011

specify strict chemical requirements for toys, it is proposed that the TR 008/2011 is amended to state that toys produced from recycled materials are permitted, provided that every item complies with the chemical requirements in Annex 2.

- Many toy companies have started to develop toys made with recycled content and have demonstrated that this can be done in full respect of the safety requirements. Removing the ban on using recycled content would make more safe and sustainable toys available for children in the Eurasian Economic Union and would also enable toy companies from the Eurasian Economic Union to develop safe toys using recycled content.

Conclusion

CEN hopes that these comments will be taken into account during the finalization and approval of amendment 3 of the EEC's Technical Regulation on "the Safety of Toys" TR CU 008/2011", in the interest of Eurasian, European and international stakeholders. We in CEN remains at EEC's disposal for further discussions or request for clarification.
