



Toy

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EU officially releases revised draft of toy safety regulations

On February 27, 2025, the European Union published Notification C/2025/1032 on the draft Toy Safety Regulation (TSR) in its Official Journal, aiming to adopt the draft Toy Safety Regulation (TSR) and repeal Directive Toy Safety Directive (TSD) 2009/48/EC. If the draft is approved, the regulation will enter into force on the 20th day after its publication in the Official Journal of the European Union.

The draft Toy Safety Regulation (TSR) has made major revisions to the Toy Safety Directive (TSD). The main revisions are as follows:

- On the basis of emphasizing the protection of users' physical health and safety, it also incorporates children's mental health and cognitive development, requiring toy manufacturers to consider the health risks posed by digital connected toys to children's psychological and cognitive development;
- Replace the EU Declaration of Conformity (DoC) with the Digital Product Passport (DPP). The Digital Product Passport is a set of product-specific data, including the DoC and additional information that can be accessed electronically through a data carrier;
- Expand the scope of products that are not applicable to the regulation, and newly add skateboards and scooters for children weighing more than 20 kg and books for children over 36 months old, which are made entirely of paper or cardboard without any additional materials or components;
- Requires that the pictogram on toys not suitable for children under 36 months be at least 10 mm in diameter;
- Expands the scope of the general ban on toys containing carcinogenic, mutagenic or reproductive toxic substances in CLP Regulation No. 1272/2008 on classification, labelling and packaging of substances and mixtures to include the following new categories:
 - Endocrine disruption (ED) category 1 or 2, for human health and the environment (ENV);
 - Skin sensitization category 1;
 - Persistent, bioaccumulative and toxic (PTB);
 - Very persistent, very bioaccumulative (vPvB);
 - Persistent, mobile and toxic (PMT);
 - Very persistent, very mobile (vPvM).
- Adjustment of restricted substance requirements, the differences between the Toy Safety Regulation (TSR) and the Toy Safety Directive (TSD) are as follows:

Substance	Toy Safety Directive (TSD)	Toy Safety Regulation (TSR)
Specific element migration	19 items	15 items (lead, cadmium, mercury, hexavalent chromium deleted)
Lead, cadmium, mercury, hexavalent chromium	/	Toys shall not contain hexavalent chromium, cadmium, mercury and lead, unless they are technically unavoidable according to good manufacturing





		practices and shall not exceed the detection limit.
Nitrosamines and nitrosatable substances	Only toys for children under 3 years old and toys intended to be placed in the mouth are regulated	The scope is expanded to all toys for all age groups
11 chemicals (TCEP, TCPP, TDCP, formamide, BIT, 3:1 CMI and MI mixture, CMI, MI, phenol, formaldehyde, and aniline)	<ul style="list-style-type: none"> ■ Only toys for children under 3 years old and toys intended to be placed in the mouth are regulated; ■ The formaldehyde emission limit for wood materials is 0.1 ml/m³. 	<ul style="list-style-type: none"> ■ The scope is expanded to all toys for all age groups; ■ The formaldehyde emission limit of wood materials is 0.062 mg/m³.
58 allergenic fragrances	Limit 100mg/kg	Limit 10mg/kg
71 allergenic fragrances	More than 100mg/kg requires labeling	More than 10mg/kg requires labeling
Fragrances	/	Prohibited to add any fragrance to toys for children under 36 months old or other toys intended to be placed in the mouth.
Per- and Polyfluoroalkyl Substances (PFAS)	/	Banned
Bisphenols	Only bisphenol A is controlled	All bisphenols are prohibited

According to the draft bill, the Toy Safety Directive (TSD) will be repealed on the first day of the month following 30 months after the Toy Safety Regulation (TSR) comes into force.

Original link: <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A52024AP0144&qid=1741653012508>

HCT SOLUTION:

The new toy regulations will have a significant impact on toy exporters to the EU. Companies will face stricter quality testing requirements, including upgraded chemical substance control and newly added restricted substances. At the same time, companies need to adapt to the requirements of digital product passports to ensure that all toys exported to the EU are equipped with compliant product passports. HCT hereby reminds companies, especially toy manufacturers, importers and suppliers, to promptly understand and master the new information requirements, strengthen the quality control of toy raw materials and products, find safer alternatives, ensure product safety, and reduce unnecessary trade losses.

