



Toy

HCT-202512-01

# Big news: The EU officially published new toy safety regulation

On December 12, 2025, the EU published the Toy Safety Regulation (EU) 2025/2509 (TSR) in its Official Journal. This regulation will enter into force on January 1, 2026, the 20th day after its publication in the Official Journal, and will apply from 1 August 2030. The Toy Safety Regulation will completely replace the current Toy Safety Directive 2009/48/EC (TSD).

The Toy Safety Regulation (EU) 2025/2509 has made major revisions to the Toy Safety Directive 2009/48/EC (TSD). The main revisions are as follows:

- The scope of exclusion now includes paintball equipment and books intended for children over 36 months old but which have no play value;
- 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;
- Adjusting warning message information: All warnings must begin with the word "Warning," or a triangular warning symbol with a height of 10 mm may be used as an alternative. Toys should include general warning instructions (if necessary), clearly indicating appropriate usage limitations. These limitations should include at least the minimum and maximum age, required abilities, and weight;
- Requires that the pictogram on toys not suitable for children under 36 months be at least 10 mm in diameter;
- New technical requirements have been added for physical and mechanical properties, including new technical requirements for simulated food, expandable toys, and magnetic toys;
- Expands the scope of the general ban on toys containing carcinogenic, mutagenic or reproductive toxic substances in CLP Regulation No EC 1272/2008 on classification, labelling and packaging of substances and mixtures to include the following new categories:
  - endocrine disruption for human health category 1 or 2;
  - specific target organ toxicity category 1, either in single exposure or in repeated exposure;
  - respiratory sensitisation category 1;
  - skin sensitisation category 1A;
- 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 2009/48/EC (TSD)	Toy Safety Regulation (EU) 2025/2509 (TSR)
Nitrosamines and nitrosatable substances	Only toys for children <b>under 3 years old</b> and toys intended to be placed in the mouth are regulated	The scope is expanded to all toys for <b>all age</b> groups
11 chemicals (TCEP, TCPP, TDCP, formamide, BIT, 3:1	■ Only toys for children <b>under 3 years old</b> and toys intended to	■ The scope is expanded to all toys for <b>all age</b> groups;





CMI and MI mixture, CMI, MI, phenol, formaldehyde, and aniline)	be placed in the mouth are regulated; ■ The formaldehyde emission limit for wood materials is <b>0.1 ml/m<sup>3</sup></b> .	■ The formaldehyde emission limit of wood materials is <b>0.062 mg/m<sup>3</sup></b> .
Bisphenol A	Migration limit for Bisphenol A: <b>0.04 mg/L</b>	Migration limit for Bisphenol A: <b>0.005 mg/L</b>
Bisphenols (excluding bisphenol A)	/	Toys are prohibited from containing 10 types of bisphenol substances.
Monomer migration (Styrene, Acrylonitrile, Butadiene, Vinyl chloride)	/	New migration limits for monomers (styrene, Acrylonitrile, Butadiene, Vinyl chloride) in polymer toy materials have been added.
allergenic fragrances	Threshold for triggering labeling requirements: <b>100 mg/kg</b> for each substance.	The labeling obligation limit has been adjusted from 100 mg/kg to <b>10 mg/kg</b> . When the labeling obligation is triggered, information on allergenic fragrances must also be included in the Digital Product Passport (DPP).
Exemption for cobalt (Co)	/	New exemptions have been added for cobalt in stainless steel, conductive components, and neodymium-based magnets.
Per- and Polyfluoroalkyl Substances (PFAS)	/	Banned

Original link: <https://eur-lex.europa.eu/eli/reg/2025/2509/oj>

## 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.

