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Safe products to protect consumers
促进产品安全，守护消费者

EU Rules and Requirements on the Safety of Toys

欧盟关于玩具安全的相关法规要求

SPEAC Key Expert Liu Kaiming
SPEAC核心专家刘开明博士

July 18, 2024

2024年7月18日



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Safe non-food consumer
Products in the EU and China

中欧消费品安全提升



What is a Safe Product? 什么是安全产品?

GPSR definition 通用产品安全法规的定义

“any product which, under normal or reasonably foreseeable conditions of use, including the actual duration of use, does not present any risk or only the **minimum** risks compatible with the product’s use, considered acceptable and consistent with a high level of protection of the health and safety of consumers”
“在正常或合理可预见使用条件下，实际使用期限内不存在任何风险，或仅存在与产品使用相关的**极低**风险且风险可接受，并可为消费者健康和 safety 提供高水平保障的产品”



What is a Safe Product? 什么是安全产品?

- Often relies on subjective judgement
通常依赖于主观判断
- Depends on purpose
取决于使用目的
- Changes with time
随时间变化

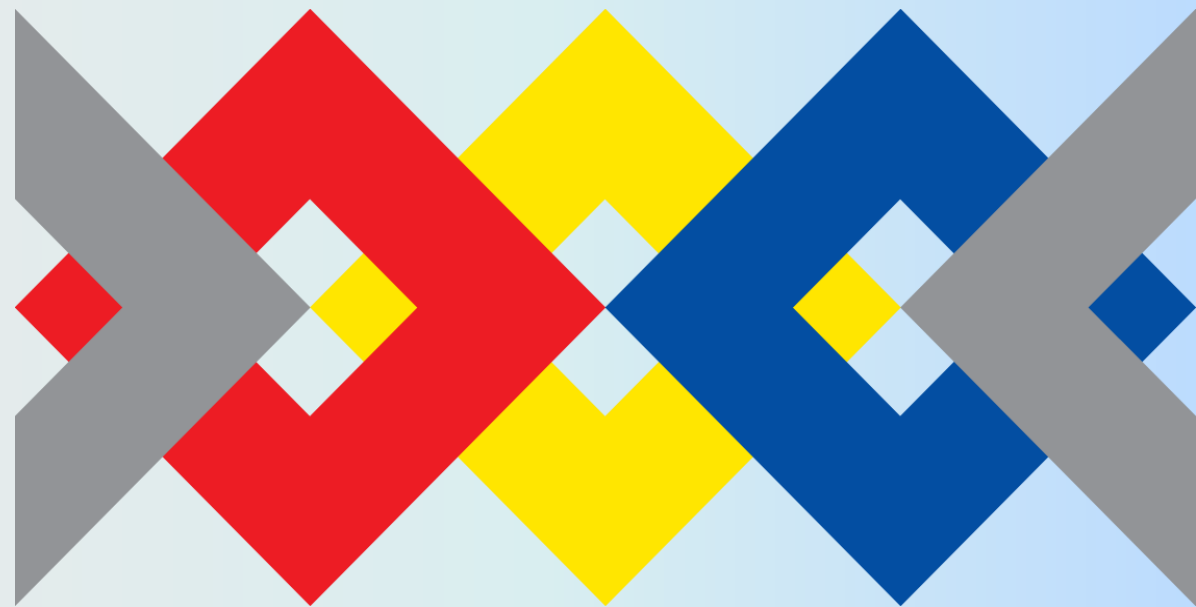


Ensuring Safety 确保安全性

- Think about it at the design stage
在设计阶段予以考虑
- Clarity on contract – what exactly are you making?
约束条件的明确性 - 产品的详实信息
- European standards
欧洲标准
 - Harmonised Standards
协调标准
- Quality control – incoming materials, production line, post-production checks
质量控制 - 来料，生产线，生产后检查

Toy product safety risks identified by the EU

欧盟发现的玩具产品安全风险



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The significance of the safety of toy products 玩具安全的重要性

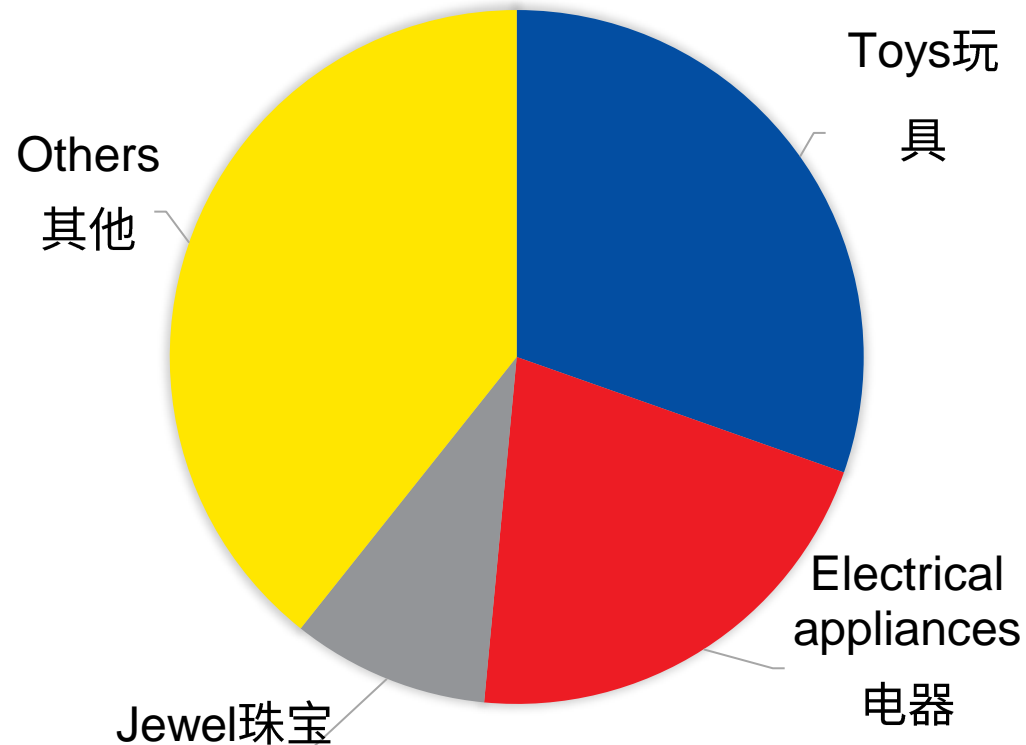
- **儿童的特点:**
脆弱性; 高被关注
Characteristics of children:
Vulnerability; Highly concerned
- **产品的特点:**
种类多; 功能多
Characteristics of products:
Multiple categories; numerous functions





Alert from Safety Gate - analysis of risk products from China 安全门通报中国风险产品分析

RISK PRODUCT CATEGORY
风险产品种类



In 2023, there were 1,235 cases of dangerous products notified by the EU Safety Gate that originated from China, accounting for 36.9% of the total number of EU Safety Gate notifications. The most frequently notified product category from China was toys, accounting for 31%.

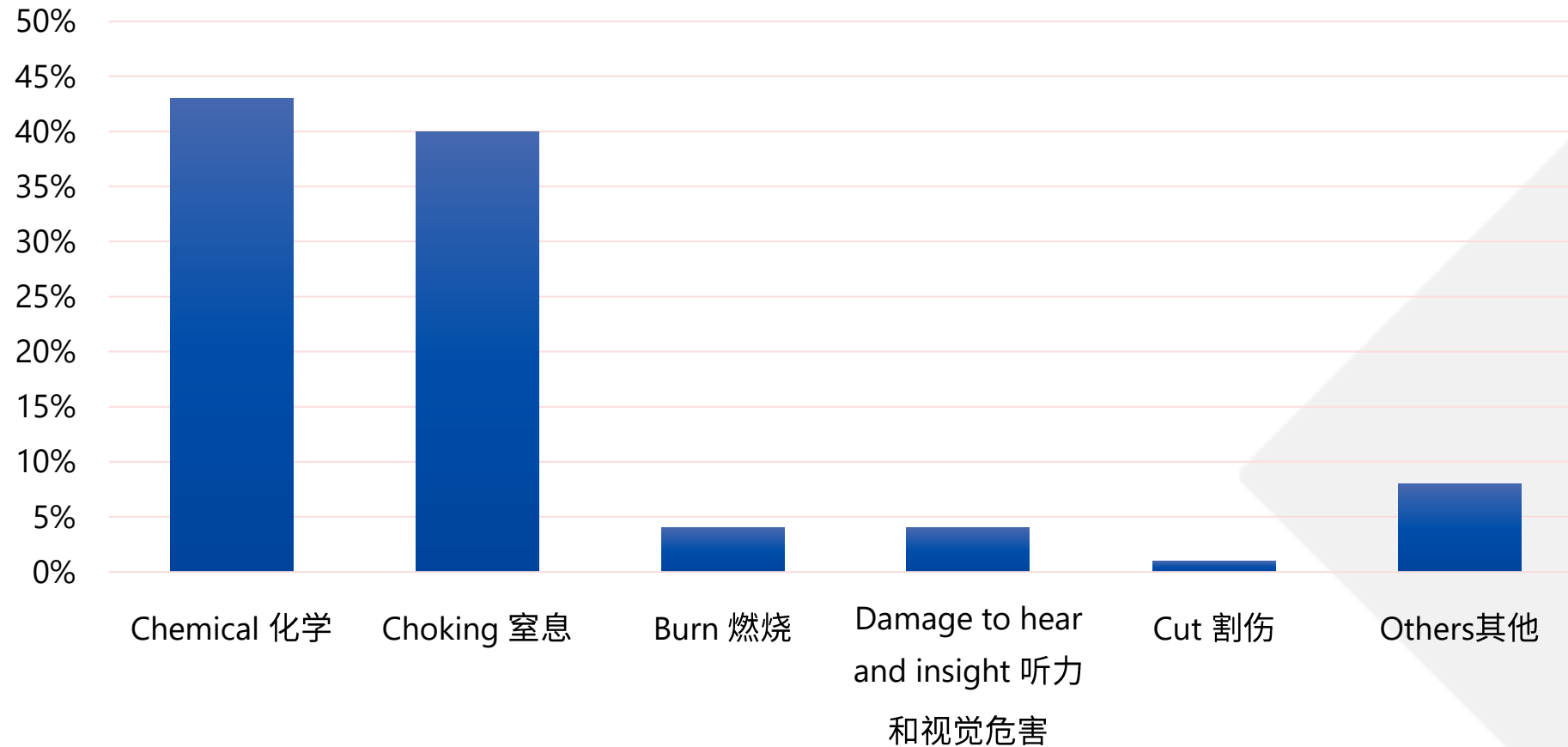
2023年，欧盟通报产品原产地为中国的有1235例，占欧盟Safety Gate通报总数的36.9%。

原产于中国被通报最多的产品为玩具（31%）。

数据来源：北京海关



Safety risks in toys products 玩具常见安全风险





Example of Chemical Risk 化学风险案例

Product 产品: Plastic doll 塑料玩偶

Risk description 风险描述: The doll head has an excessive amount of bis (2-ethylhexyl) phthalate (DEHP) (measured value: up to 12.3 % by weight). This phthalate may harm the health of children, possibly causing damage to the reproductive system. 玩偶头部含有过量的DEHP（测量值12.3%重量计）。该邻苯二甲酸酯对儿童健康有害，可损害生殖系统。

Alert reason 通报原因: The product does not comply with the REACH Regulation. 不符合REACH 法规要求

Published on 发布日期: 05/01/2024

Measures ordered by public authorities (to: Importer) 监管机构采取的措施 (对进口商): Withdrawal of the product from the market 从市场撤回





Example of Choking Risk 窒息风险案例

Product 产品: Rattle toy set 拨浪鼓玩具套装

Risk description 风险描述: The set of rattles has small parts. A small child could put them into the mouth and choke 套装含有小零件，小孩子可能将其放入口中导致窒息。

Alert reason 通报原因: The product does not comply with the requirements of the Toy Safety Directive nor with the European standard EN 71-1. 产品不符合玩具安全指令要求，也不符合EN 71-1.

Published on 发布日期: 22/12/2023

Measures ordered by public authorities (to: Importer) 监管机构采取的措施 (对进口商): Withdrawal of the product from the market 从市场撤回产品





Example of Damage to hearing Risk 听力损伤风险案例

Product 产品: Toy telephone 玩具电话

Risk description 风险描述: The sound pressure level produced by the toy is too high (measured values: up to 81.1 dB), which could lead to permanent or partial hearing loss. 玩具产生的声压级过高(测量值:高达81.1 dB), 可能导致永久性或部分听力丧失。

Alert reason 通报原因: The product does not comply with the requirements of the Toy Safety Directive nor with the European standard EN 71-1. 产品不符合玩具安全指令要求, 也不符合EN 71-1.

Published on 发布日期: 27/01/2023

Measures ordered by public authorities (to: Importer) 监管机构采取的措施 (对进口商): Withdrawal of the product from the market 从市场撤回产品





Example of Cut Risk 割伤风险案例

Product 产品: Plastic toy 塑料玩具

Risk description 风险描述: The dinosaur's tail has rough edges which can cause cuts to a child. 恐龙角有粗糙的边缘，会割伤小孩。

Alert reason 通报原因: The product does not comply with the requirements of the Toy Safety Directive nor with the European standard EN 71-1. 产品不符合玩具安全指令要求，也不符合EN 71-1.

Published on 发布日期: 24/03/2023

Measures ordered by public authorities (to: Importer) 监管机构采取的措施 (对进口商): Import rejected at border 海关边境拒绝进口





Example of Burn Risk 燃烧风险案例

Product 产品: Children's fancy-dress mask 儿童化妆面具

Risk description 风险描述: The product is highly flammable. Children may wear the costume close to an ignition source and the costume may catch fire, resulting in burns. 产品高度易燃，儿童穿着的服装靠近点火源时，服装可能会着火，导致烧伤。

Alert reason 通报原因: The product does not comply with the requirements of the Toy Safety Directive nor with the European standards EN 71-1 and EN 71-2. 产品不符合玩具安全指令要求，也不符合EN 71-1和EN 71-2。

Published on 发布日期: 24/03/2023

Measures ordered by public authorities (to: Importer) 监管机构采取的措施 (对进口商): Withdrawal of the product from the market 从市场撤回产品





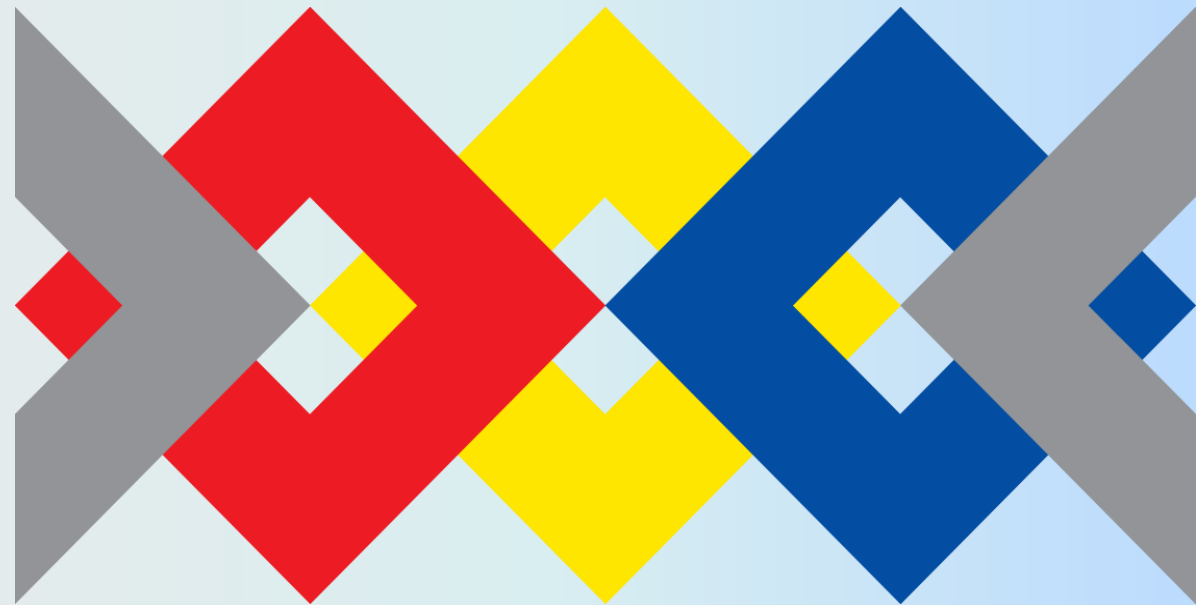
Consequences of non-compliant products 问题产品的后果

- Causing harm to consumers 给消费者造成伤害
- Due to the economic and reputational losses caused by the products are notified, recall, or destroyed or sued. 产品被通报, 甚至召回, 或销毁, 或诉讼而导致的经济和声誉损害
- Indirect consequences – can be even more significant and impact EU and Chinese businesses

间接后果—可能更为严重, 甚至影响到欧盟和中国之间的贸易

EU rules on toys

欧盟玩具的主要法规



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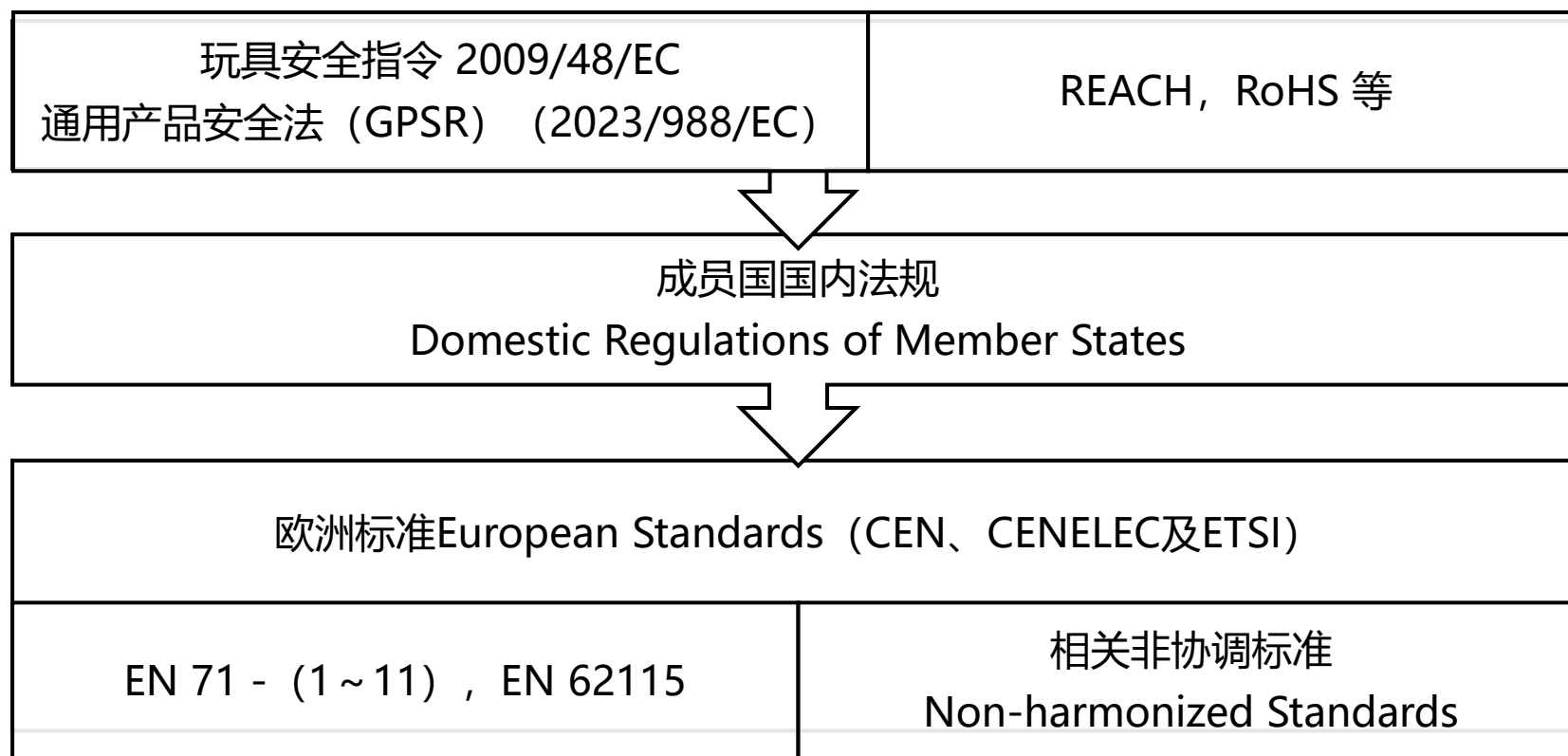
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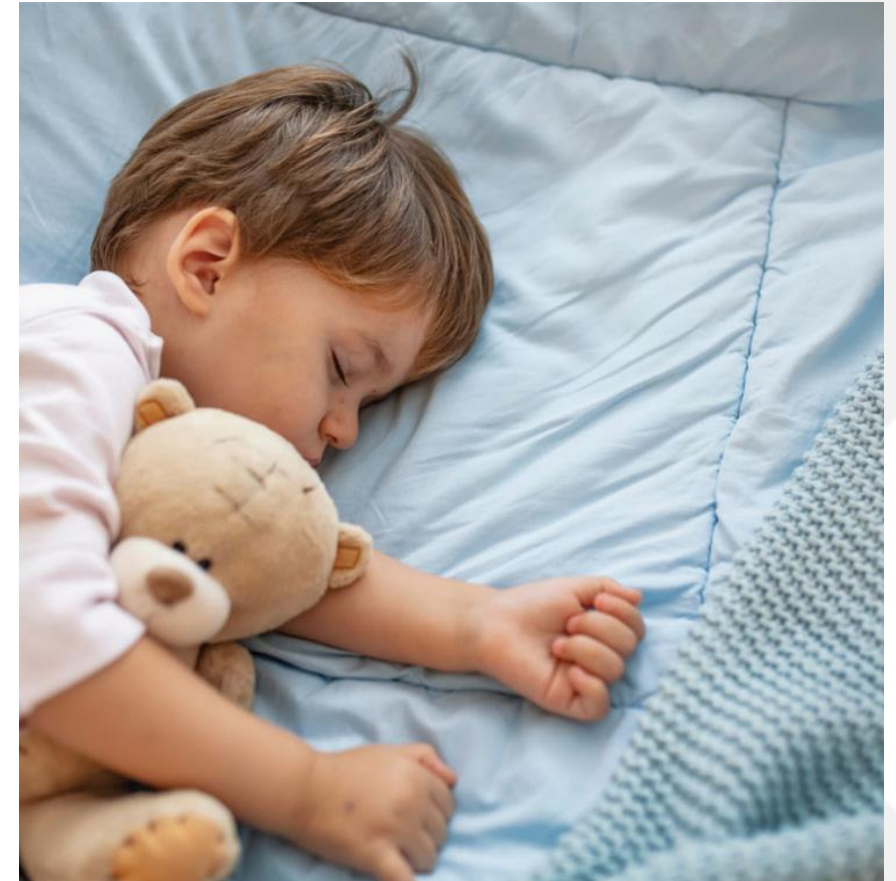
Legislation and standard system 欧盟玩具安全法规标准体系





Toy Safety Directive/Harmonized Standards 玩具安全指令/协调标准

- EN 71 – 1 to 3, 9 to 11
EN 71 - 1至3、9至11
 - Mechanical and physical properties
机械和物理学特性
 - Flammability
可燃性
 - Chemical requirements
化学要求
- EN 71 – 4, 5, 7
Toys related to chemistry activities
涉及化学活动的玩具
 - Finger Paints
指画颜料





Toy Safety Directive/Harmonized Standards 玩具安全指令/协调标准

EN 71-7 Requirements for Finger Paints
指画颜料的要求

EN 71-8 Swinging, sliding, and similar toys for indoor and outdoor family entertainment
供户内和户外家庭娱乐用的秋千、滑板 and 类似玩具

EN 71-12 N-nitrosamines and N-nitrosamines
N-亚硝胺和N-亚硝基化合物

EN 71-13 Smell board toys, makeup sets, and taste toys
嗅觉棋盘玩具、化妆包和味觉玩具

EN IEC 62115 Electric toy safety
电玩具安全





Declaration of Conformity 符合性声明

- Through testing, determine that the product meets the requirements of the harmonized standard, if it meets the safety requirements of the harmonized standard, fill in the declaration of conformity.通过检测，判断产品符合协调标准的要求，如果符合协调标准的安全要求，就填写符合性声明。

The declaration must include the following information:
声明中的信息必须包括：

- 玩具型号toy model number
- 制造商/授权代理的名称和地址Name and Address of manufacturer/authorized representative
- 彩色图片 Color picture
- 适用的法规 Applicable regulations
- 适用的协调标准 Applicable harmonized standards
- 公告机构信息（适用时） Notification body (if applicable)
- 签字 Signature

EC DECLARATION OF CONFORMITY

- No ... (unique identification of the toy(s))
- Name and address of the manufacturer or his authorised representative:
- This declaration of conformity is issued under the sole responsibility of the manufacturer:
- Object of the declaration (identification of toy allowing traceability). It shall include a colour image of sufficient clarity to enable the identification of the toy.
- The object of the declaration described in point 4 is in conformity with the relevant Community harmonisation legislation:
- References to the relevant harmonised standards used, or references to the specifications in relation to which conformity is declared:
- Where applicable: the notified body ... (name, number) ... performed ... (description of intervention) ... and issued the certificate:
- Additional information:

Signed for and on behalf of:

(place and date of issue)

(name, function)(signature)



CE marking CE 标识

- CE mark: Height at least 5mm
CE 标志：高度至少 5毫米
- The name of the manufacturer, the registered trade name or the registered trade mark, and the address at which the manufacturer can be reached shall be indicated on the toy 制造商名称、注册商标名称或注册商标标志，以及可联系到制造商的地址应在玩具上标明
- The manufacturer shall ensure that the toy has the type, batch, serial number, model number or any other easily identifiable mark 制造商应确保玩具具有类型、批次、序列号、型号或其它任何方便辨识的标记





Risk warning signs 风险警示标识

- Instructions and safety information in a language that is easy for consumers to understand 易于为消费者理解的语言书写的说明书和安全信息
- Information relating to the age group of the toy, in particular the question of determining whether the toy is suitable for children under 36 months of age 与玩具年龄组相关的资料，特别是判定玩具是否适合 36 个月以下儿童使用的问题





Other Considerations 其他考虑因素

- RoHS - Restriction on hazardous substances
RoHS - 关于有害成分的限制
- WEEE- Waste of Electrical and Electronic Equipment Packaging
and packaging waste
WEEE - 电气与电子设备废弃物包装和包装废弃物



Other Considerations 其他考虑因素

- REACH - Regulation for Registration, Evaluation, Authorisation and Restriction of Chemicals
REACH - 化学品注册、评估、许可和限制法规
- PACKAGING - Directive 94/62/EC on packaging and packaging waste
包装 - 关于包装和包装废物的指令94/62/EC



Product marking requirements 产品标识清单

- name and address of the manufacturer, or if the manufacturer is outside of the EU, the name and address of the manufacturer and the importer
制造商的名称和地址；如果制造商在欧盟之外，则要有制造商和进口商的名称和地址
- type, batch, serial or model number
品类、批次、序列号或型号
- CE mark 玩具的CE标志
- Warnings 警告标识





Sources of information 信息源

- SPEAC website <https://speac-project.eu>
SPEAC项目网站
- Safety Gate <https://ec.europa.eu/safety-gate/#/screen/home>
“安全门” 网站
- European Union information (Europa) https://ec.europa.eu/growth/sectors/toys/safety_en
欧盟官方网站 (Europa)
- CEN <https://www.cencenelec.eu/>



Contact SPEAC 联系SPEAC

Email: contact@speac-project.eu

联系邮箱: contact@speac-project.eu



SPEAC website
官方网站



WeChat account
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